



CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY BOARD OF DIRECTORS

Board of Directors

Derek Yurosek Chairperson, Cuyama Basin Water District
Lynn Compton Vice Chairperson, County of San Luis Obispo
Das Williams Santa Barbara County Water Agency
Cory Bantilan Santa Barbara County Water Agency
Glenn Shephard County of Ventura
Zack Scrivner County of Kern

Paul Chounet Cuyama Community Services District
George Cappello Cuyama Basin Water District
Byron Albano Cuyama Basin Water District
Jane Wooster Cuyama Basin Water District
Tom Bracken Cuyama Basin Water District

AGENDA

July 10, 2019

Agenda for a meeting of the Cuyama Basin Groundwater Sustainability Agency Board of Directors to be held on Wednesday, July 10, 2019 at 4:00 PM, at the Cuyama Valley Family Resource Center, 4689 CA-166, New Cuyama, CA 93254. To hear the session live call (888) 222-0475, code: 6375195#.

Teleconference Locations:

Cuyama Valley Family Resource Center 4689 CA-166 New Cuyama, CA 93254	4941 Nipomo Drive Carpinteria, CA, 93013
--	---

The order in which agenda items are discussed may be changed to accommodate scheduling or other needs of the Board or Committee, the public, or meeting participants. Members of the public are encouraged to arrive at the commencement of the meeting to ensure that they are present for discussion of all items in which they are interested.

In compliance with the Americans with Disabilities Act, if you need disability-related modifications or accommodations, including auxiliary aids or services, to participate in this meeting, please contact Taylor Blakslee at (661) 477-3385 by 4:00 p.m. on the Friday prior to this meeting. Agenda backup information and any public records provided to the Board after the posting of the agenda for this meeting will be available for public review at 4689 CA-166, New Cuyama, CA 93254. The Cuyama Basin Groundwater Sustainability Agency reserves the right to limit each speaker to three (3) minutes per subject or topic.

1. Call to Order
2. Roll Call
3. Pledge of Allegiance
4. Approval of Minutes
 - a. June 5, 2019
5. Report of the Standing Advisory Committee
6. Groundwater Sustainability Plan
 - a. Groundwater Sustainability Plan Update

- b. Funding Structure Decision
 - c. Fiscal Year 2019-20 Budget Adoption
 - d. Discussion on Updated GSP Draft and Response to Comments
 - e. Discussion on Mechanism for Ensuring Potential Future Pumping Changes are Equitable
 - f. Notice of Intent to Adopt the GSP
 - g. Set Public Hearing Date
 - h. Set SAC and Board Meetings through January 2020
 - i. Stakeholder Engagement Update
 - i. 90-Day Public Comment Process
7. Groundwater Sustainability Agency
- a. Report on the Standing Advisory Committee Vacancy
 - b. Report of the Executive Director
 - c. Progress & Next Steps
 - d. Report of the General Counsel
8. Financial Report
- a. Financial Management Overview
 - b. Financial Report
 - c. Payment of Bills
9. Reports of the Ad Hoc Committees
10. Directors' Forum
11. Public comment for items not on the Agenda
- At this time, the public may address the Board on any item not appearing on the agenda that is within the subject matter jurisdiction of the Board. Persons wishing to address the Board should fill out a comment card and submit it to the Board Chair prior to the meeting.*
12. Correspondence
12. Adjourn

Cuyama Basin Groundwater Sustainability Agency

Acronyms List

ARMA	Autoregression Moving Average
BOD	Board of Directors
CA	California
CASGEM	California Sustainable Groundwater Elevation Monitoring
CB	Cuyama Basin
CBGSA	Cuyama Basin Groundwater Sustainability Agency
CBWD	Cuyama Basin Water District
CCSD	Cuyama Community Services District
CDEC	California Data Exchange Center
CVCA	Cuyama Valley Community Association
CVRD	Cuyama Valley Recreation District
DMS	Data Management System
DWR	California Department of Water Resources
EKI	EKI Environment & Water, Inc.
ET	Evapotranspiration
FRC	Cuyama Valley Family Resource Center
FY	Fiscal Year
GAMA	Groundwater Ambient Monitoring and Assessment Program
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HG	Hallmark Group (Executive Director)
ITRC	Irrigation Training & Research Center
IWFM	Integrated Water Flow Model
JPA	Joint Exercise Powers Agreement
Kern	County of Kern
NOAA	National Oceanic and Atmospheric Administration
NWIS	National Water Information System
PRISM	Parameter-elevation Regressions on Independent Slopes Model
SAC	Standing Advisory Committee
Santa Barbara	County of Santa Barbara
SBCWA	Santa Barbara County Water Agency
SGMA	Sustainable Groundwater Management Act
SLO	San Luis Obispo County
SWCRB	State Water Resources Control Board
TAF	Thousand Acre Feet
TO	Task Order
USDA	U.S. Department of Agriculture
USGS	U.S. Geological Survey
Ventura	County of Ventura
W&C	Woodard & Curran (GSP Development Consultant)
WMA	Water Management Area
WY	Water Year

Cuyama Basin Groundwater Sustainability Agency Board of Directors

June 5, 2019

Draft Meeting Minutes

Cuyama Valley Family Resource Center, 4689 CA-166, New Cuyama, CA 93254

PRESENT:

Yurosek, Derek – Chair
 Albano, Byron
 Arnold, Debbie – *Alternate for Lynn Compton (telephonic)*
 Bracken, Tom
 Cappello, George
 Chounet, Paul
 Christensen, Alan – *Alternate for Zack Scrivner*
 Shephard, Glenn
 Williams, Das
 Wooster, Jane
 Beck, Jim – Executive Director
 Hughes, Joe – Legal Counsel

ABSENT:

Bantilan, Cory

1. Call to order

Chair Derek Yurosek called the meeting to order at 4:04 p.m.

2. Roll call

Hallmark Group Project Coordinator Taylor Blakslee called roll (shown above) and Chair Yurosek that there was a quorum of the Board.

3. Pledge of Allegiance

The pledge of allegiance was led by Chair Yurosek.

4. Approval of Minutes

Chair Yurosek opened the floor for comments on the May 1, 2019 CBGSA Board meeting minutes.

MOTION

Director Tom Bracken made a motion to adopt the May 1, 2019 CBGSA Board meeting minutes. The motion was seconded by Glenn Shephard, and the motion passed with a majority vote.

AYES: Directors Albano, Arnold, Bracken, Cappello, Chounet, Shephard, Williams,

	Wooster and Yurosek
NOES:	None
ABSTAIN:	None
ABSENT:	Directors Bantilan and Scrivner

5. Report of the Standing Advisory Committee

CBGSA SAC Vice Chair Brenton Kelly provided a report on the May 30, 2019 SAC meeting, which is provided in the Board packet.

The Board Ad Hoc Committee on SAC membership (Directors Paul Chounet, Das Williams and George Cappello) was asked to review the SAC applicant submittal and report back next month.

Alternate Alan Christensen arrived at 4:09 pm

6. Groundwater Sustainability Plan

Chair Yurosek announced that we are changing the order of the agenda where 6f will follow 6c, and then followed by 6d and 6e.

a. Groundwater Sustainability Plan Update

Woodard & Curran's (W&S) Senior Water Resource Engineer Brian Van Lienden provided an update on the GSP development, which is included in the Board packet.

b. Discussion on GSP Public Draft

i. Summary of Comments

W&C's Senior Water Resources Engineer Lyndel Melton reported on the number of comments received provided a list of commenters and presented the common comments received.

Director Jane Wooster commented that there was an additional comment received and Mr. Blakslee reported that he will distribute that comment this week.

Mr. Melton reported that the W&C team will be performing an economic analysis at their cost and that will be done this year.

Director Cappello commented that he wanted to make sure the public understands that a number of comments received on the GSP do not have a SGMA nexus.

Mr. Melton and CBGSA Executive Director Jim Beck agreed, but said the Board is being presented with the common comments received for educational purposes.

ii. Direction of Sustainability Goal Definition

Mr. Melton presented the SAC's recommended changes to the sustainability goal and reported that staff was in agreement with their recommendation.

A lengthy discussion was held among the Board members and stakeholders to discuss refinements and modifications to the sustainability goal language. After a motion failed

to pass, additional discussion occurred that concluded with Director Shephard making a motion to approve the following sustainability goal definition that incorporated various items raised during the discussion: "To maintain a sustainable groundwater resource for the beneficial users of the Cuyama groundwater basin now and into the future consistent with the California Constitution." The motion was seconded by Director Bracken, a roll call vote was completed, and the motion passed with an 88.89% vote.

MOTION

A motion was made by Director Shephard and seconded by Director Bracken to approve the following sustainability goal language: "To maintain a sustainable groundwater resource for the beneficial users of the Cuyama groundwater basin now and into the future consistent with the California Constitution." A roll call vote was made, and the motion passed with an 88.89% vote.

AYES: Directors Albano, Arnold, Bantilan, Bracken, Cappello, Chounet, Christensen, Shephard, Wooster, Yurosek
 NOES: Director Williams
 ABSTAIN: None
 ABSENT: Director Bantilan

iii. Direction on Basin-wide Undesirable Results (30% of Wells Exceeding Thresholds)

Mr. Melton presented a summary of the draft language on basin-wide undesirable results and the percentage of wells exceeding minimum thresholds and/or measurable objective that would indicate non-attainment of sustainability for the basin. SAC Vice Chair Kelly provided the SAC's recommendation.

Director Williams asked where the interpretation of the 30% thresholds triggering State intervention came from. Joe Hughes said that it is not specified in the regulations and staff indicated that it is a percentage that has been used in other basins.

Director Shephard commented that if the designated percentage for sustainability is exceeded, there is an opportunity for dialog with the State and violating your basin threshold trigger may cause your basin to be put into probation, but it may not automatically result in State Water Board administration of the basin.

Brenton Kelly asked how many wells are already in violation of their thresholds. Mr. Melton replied that 8 wells are currently over their thresholds and 5 are in the management area. This is roughly 13% based on the 60 total groundwater level representative wells.

Director Cappello made a motion to accept W&C's wording for Sections 3.2.1 and 3.2.4 in the GSP. The motion was seconded by Director Wooster. A roll call vote was made, and the motion failed with a 66.67% vote.

MOTION

A motion was made by Director Cappello and seconded by Director Wooster to accept W&C's wording for Sections 3.2.1 and 3.2.4 in the GSP. A roll call vote was made, and the motion failed with a 66.67% vote.

AYES: Directors Albano, Arnold, Bantilan, Bracken, Cappello, Christensen, Shephard, Wooster, Yurosek
 NOES: Director Chounet and Williams
 ABSTAIN: None
 ABSENT: Director Bantilan

Director Williams suggested including language to accomplish interim milestones.

Director Cappello commented that we will be collecting data for the first couple of years and if it goes dry during that time, we could hit the 30% threshold fairly easily. He commented that as of April 2018, roughly 13% of the representative wells were below their minimum thresholds. He also commented that the Cuyama Basin has huge groundwater reserves and we have time to figure this out.

Director Wooster commented that the CBGSA needs to not be so onerous in setting water use restrictions.

Director Williams made a suggestion to vote on the interim milestones first and Chair Yurosek agreed to this. Chair Yurosek then directed that the meeting proceed to the item on Interim Milestones.

iv. Direction on Interim Milestones for Representative Wells

Mr. Melton reported on the interim milestones that included the SAC recommendation from the May 30, 2019 meeting. He reported that staff's recommendation was to operate somewhere near the bottom of the measure of operational flexibility since we do not have enough data at this time.

Director Yurosek commented that this is a basin issue and we should have a game plan for the entire basin.

Director Williams made a motion to set the basin-wide undesirable results trigger for water levels and water quality at 30% exceedance of MTs for 2 consecutive years and implement interim milestones that target the MTs by 2025 and 50% of the MOOF by July 1, 2032. Director Chounet seconded the motion, a roll call vote was made and passed with an 82.22% vote.

MOTION

A motion was made by Director Williams and seconded by Director Chounet to set the basin-wide undesirable results trigger for water levels and water quality at 30% exceedance of MTs for 2 consecutive years and implement interim milestones that target the MTs by 2025 and 50% of the MOOF by July 1, 2032. A roll call vote was made, and the motion passed with an 82.2% vote.

AYES: Directors Albano, Arnold, Bantilan, Bracken, Cappello, Christensen, Chounet, Shephard, Williams, and Wooster
 NOES: Director Yurosek
 ABSTAIN: None

ABSENT: Director Bantilan

v. Direction on Adaptive Management Triggers

Mr. Melton provided an update on the adaptive management trigger language changes suggested by the SAC.

SAC Vice Chair commented that their strikeouts were intended to remove language that was redundant or unclear.

Director Wooster commented that she thought the SAC did a good job rewording these triggers and actions.

Director Williams made a motion to accept the SAC's recommendations for the rewritten adaptive management language. The motion was seconded by Director Chounet, a roll call was made and the motion passed with an 88.89% vote.

MOTION

A motion was made by Director Williams and seconded by Director Chounet to accept the SAC's recommendations for the rewritten adaptive management language. A roll call vote was made, and the motion passed with a vote of 88.89%.

AYES: Directors Albano, Arnold, Bantilan, Bracken, Cappello, Christensen, Chounet, Shephard, Williams, Wooster, and Yurosek
 NOES: None
 ABSTAIN: None
 ABSENT: Director Bantilan

Alternate Debbie Arnold left the meeting at 6:35 pm

c. Discuss Model Sensitivity Analysis

Ali Taghavi of Woodard and Curran reviewed a PowerPoint presentation on the numerical model sensitivity analysis, which was provided in the Board packet.

Mr. Taghavi said the problem with the USGS model was that it could not calibrate with observed data.

Chair Yurosek asked if W&C will be able to update the model to be more accurate by the first major update in 2025. Mr. Taghavi replied that yes, they would.

Chair Yurosek commented that he is concerned that we are making decision in three years based on a model that will be updated in five years.

d. Fiscal Year 2019-20 Budget Adoption

No discussion occurred and no action was taken.

e. Adopt Funding Structure

Mr. Beck presented a review of the cost allocation tool that he had developed. The Board discussed a number of cost allocation options and principles.

Matt Young reported that in other smaller basins that he is familiar with, the GSA annual budget is between \$700,000 and \$1 million.

Director Shephard reported that he has seen allocations of \$12-80 per acre foot to fund the annual budget for GSA's.

Alternate Director Christensen commented that in Indian Wells Valley, the assessment is \$30 per acre foot. He commented that Cuyama does not have enough people to spread the costs over.

Local cattle rancher Juble reported that he would lose his ranch in the first year if an acreage-based assessment is enacted.

Director Albano commented that he thinks there needs to be compensation for the benefit of the water.

Director Wooster commented that she thinks the State needs to fund projects before they are implemented.

Alternate Christensen offered to talk to DWR regarding grant funding opportunities and report back to the Board.

Director Wooster asked what the process is for implementing a pumping fee. Joe Hughes said that a pumping fee is actually exempt from Prop 26 and would require a Board vote. He said it is a simpler process than a Prop 218.

Chair Yurosek suggested distributing the cost allocation tool to the Board so they can take it to their respective Boards for consideration and come back in July to see if they can agree on an approach.

f. Review GSP Development Cash Flow

Mr. Beck presented the updated cash flow.

Chair Yurosek recalled that in the original cashflow discussions, the GSA participants were to receive a significantly larger refund at the end of the Project than was presented in this most recent cashflow.

Director Chounet said he recalled getting there being two assessments to cover the administrative costs and remembered the amount being refunded to the Participants, similar to that presented by Mr. Beck at this meeting.

Chair Yurosek requested the Hallmark Group distribute the original cash flow and the amount that was originally presented to be returned to the participants.

g. Stakeholder Engagement Update

No additional update.

7. Groundwater Sustainability Agency

a. Report of the Executive Director

No additional update.

b. Progress & Next Steps

Mr. Beck provided an update on the near-term GSP schedule and accomplishments and next steps, which are summarized in the Board packet.

c. Report of the General Counsel

No additional update.

d. Report on Prop 68 Funding Opportunity

No additional update.

8. Financial Report

a. Financial Management Overview

Mr. Blakslee provided an overview of the CBGSA’s financial activities.

b. Financial Report

Mr. Blakslee provided an overview of the April 2019 financial report and is included in the Board packet.

c. Selection of Audit Firm

MOTION

A motion was made by Director Cappello and seconded by Director Chounet to approve the selection of Daniels Phillips Vaughan and Bock to perform the audit of the CBGSA for the periods of October 2017 through June 2019 and July 2018 through June 2019 for a cost not to exceed \$9,900. A roll call vote was made, and the motion passed unanimously.

- AYES: Directors Albano, Arnold, Bantilan, Bracken, Cappello, Christensen, Chounet, Shephard, Williams, Wooster, and Yurosek
- NOES: None
- ABSTAIN: None
- ABSENT: Director Bantilan

d. Payment of Bills

Mr. Blakslee reported on the payment of bills for the month of April 2019.

MOTION

A motion was made by Director Cappello and seconded by Director Bracken to approve payment of the bills through the month of April 2019 in the amount of \$99,449.41, pending receipt of funds. A roll call vote was made, and the motion passed unanimously.

- AYES: Directors Albano, Arnold, Bracken, Cappello, Chounet, Scrivner, Shephard, Williams, Wooster, Yurosek

NOES:	None
ABSTAIN:	None
ABSENT:	Director Bantilan

9. Reports of the Ad Hoc Committees

Nothing to report.

10. Directors' Forum

Nothing to report.

11. Public comment for items not on the Agenda

12. Adjourn

Chair Yurosek adjourned the meeting at 8:59 p.m.

Minutes approved by the Board of Directors of the Cuyama Basin Groundwater Sustainability Agency the __ day of __ 2019.

BOARD OF DIRECTORS OF THE
CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

Chair: _____

ATTEST:

Secretary: _____



TO: Board of Directors
Agenda Item No. 5

FROM: Roberta Jaffe, Standing Advisory Committee Chair

DATE: July 10, 2019

SUBJECT: Report of the Standing Advisory Committee

Issue

Report on the Standing Advisory Committee meeting.

Recommended Motion

None – information only.

Discussion

Provided as Attachment 1 is a report on the June 27, 2019 Standing Advisory Committee (SAC) from SAC Chair Roberta Jaffe and Vice Chair Brenton Kelly.

The purpose of this report is to provide the Cuyama Basin Groundwater Sustainability Agency Board of Directors with SAC input on the various Groundwater Sustainability Plan (GSP) components and issues that will better equip the Board when making decisions on GSP-related issues.

Standing Advisory Committee Report**Meeting: June 27, 2019**

Submitted to the GSA Board July 2, 2019

By Roberta Jaffe, SAC Chair and Brenton Kelly SAC Vice-Chair

8 of 8 SAC members were present (1 over telephone). There were approximately 8 people in the audience including GSA Director Jane Wooster.

There were 3 main areas of discussion:

1. Discussion on Updated GSP Draft and Response to Comments
2. Cost allocation for Implementation Budget
3. 90 Day Public Comment Process and Intent to Adopt

Recommendations to the GSA Board:

The following recommendations are being made to the GSA Board:

- **Review of Comments.** During the 90-Day Comment Period the SAC requests the Board review items that were commented on by multiple responders, but not yet addressed or revised through the comment process. (Please see discussion below.)
- **Direction on Cost Allocation.** After a lengthy discussion, the SAC was polled and made individual cost allocation recommendations. (Please see discussion and table below.)
- **Notice of Intent to Adopt the GSP.** The motion to approve the notice of intent to adopt the GSP was passed on a 7-1 vote.
- **Set SAC and Board Meetings through January 2020**

The SAC reached consensus to approve the meeting date changes through January 2020 with several modifications that will be reflected in the updated schedule presented to the Board.

Key Discussions:**1. Updated GSP Draft and Response to Comments**

The SAC expressed appreciation to Woodard & Curran for their detailed analysis of the comments submitted on the GSP Public Draft. We also requested that a meta-analysis be done so the Board could see what comments were made repeatedly by different commenters. The example was given regarding water quality: while this was addressed as a concern, it was not reconsidered since the Board had previously adopted the draft Chapter which names TDS as the only constituent to be monitored for water quality. The SAC asked that Board review some of these topics during the 90-day comment period. W&C was asked to summarize the most repeated comments and came up with the following:

GDEs: 11 commenters made 23 total comments on the document (counted by Chapter); 2 additional comments were made at the May 1 Public Workshops

Water Quality: 9 commenters made 15 total comments on the document (counted by Chapter); 6 additional comments were made at the May 1 Public Workshops.

2. Cost Allocation on Implementation Budget

Several SAC members mentioned they had been contacted by Cuyama residents and ranchers regarding concerns for how costs will be allocated to cover the implementation of the GSP. We had a lengthy discussion which included Legal Counsel Joe Hughes explaining 3 options: (1) acreage based assessment (2) water usage based assessment and (3) a hybrid approach. He also explained how an acreage assessment would require a Prop 218 property owners vote and

a water usage fee would only require a vote by the GSA Board with the possibility of a protest vote by a majority of the property owners.

The SAC was polled as follows:

SAC MEMBER	ACREAGE	WATER USAGE	HYBRID	INCENTIVES FOR EFFECT WATER USE AND CONSERVATION	WATER PRICE TO SUST. YIELD	OTHER
1		x		x		
2		x		x		
3		x				
4		x		x	X	Tiered approach
5		x		x	x	
6			x			
7			x	x	x	Tiered approach
8			x	x	x	Heavily on extraction
TOTAL	0	5	3	6	4	

75% recommend the pricing be incentivized for effective water use and conservation.

62% recommend the allocation be based on water extraction.

50% recommend the pricing for water use be incentivized toward reaching the sustainable yield.

38% recommend the allocation be based on a hybrid approach.

No SAC members opted for assessment only based on acreage.

3. 90 Day Public Comment Process and Intent to Adopt

Woodard and Curran Project Manager Brian Van Lienden clarified the purpose of the 90 day comment period. This will be an opportunity for those who did not think their comments were adequately addressed to comment once again as well as for new comments to be submitted. The SAC asked for some modifications in the calendar which were agreed upon. And the SAC voted in favor of the Board approving an intent to adopt the GSP. As part of the discussion of this motion it was requested that prior to the October 9th hearing date the Board review topics that were repeatedly commented upon, but not addressed or revisited.

Summary:

This meeting was our last regular monthly meet of the SAC during the two-year development of the GSP. We made recommendations to the Board to reconsider during the upcoming 90-day comment period guidelines for Undesirable Results such as water quality and impacts on groundwater dependent ecosystems based on comments on the Public Draft. We discussed and made suggestions on options for cost allocations in which over 75% of the SAC recommended that the pricing be incentivized for effective water use and conservation. And we passed a motion that the Board approve an intent to adopt the GSP at its July 10th meeting.



TO: Board of Directors
Agenda Item No. 6a

FROM: Lyndel Melton, Woodard & Curran (W&C)

DATE: July 10, 2019

SUBJECT: Groundwater Sustainability Plan Update

Issue

Update on the Cuyama Basin Groundwater Sustainability Agency Groundwater Sustainability Plan.

Recommended Motion

None – information only.

Discussion

Cuyama Basin Groundwater Sustainability Agency Groundwater Sustainability Plan (GSP) consultant Woodard & Curran's GSP update is provided as Attachment 1.

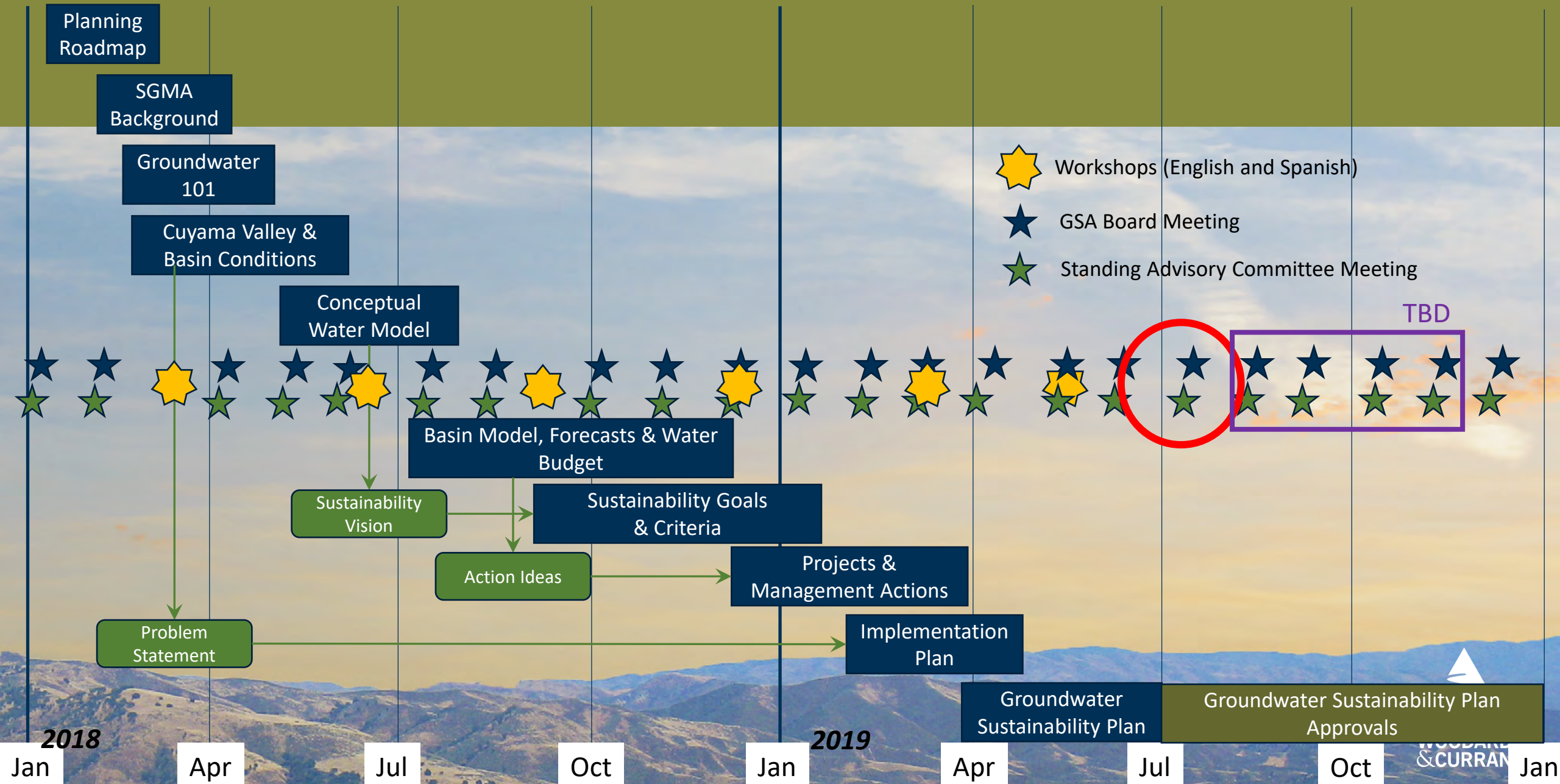
Cuyama Basin Groundwater Sustainability Agency

Groundwater Sustainability Plan Update

July 10, 2019



Cuyama Basin Groundwater Sustainability Plan – Planning Roadmap ¹⁷



June GSP Accomplishments

- ✓ Participate in discussions with Budget Ad-hoc committee
- ✓ Reviewed and developed responses to comments on GSP Public Draft
- ✓ Developed and submitted GSP Final Draft, including all sections, for review
- ✓ Resolved DWR comments on initial grant invoice and submitted a final version to DWR



TO: Board of Directors
Agenda Item No. 6b

FROM: Jim Beck, Executive Director

DATE: July 10, 2019

SUBJECT: Funding Structure Decision

Issue

Adopt the funding structure.

Recommended Motion None – information only.

Discussion

Agenda item No. 6b: Funding Structure Decision is now a verbal report.

ITEM NO. 6B: ADOPT FUNDING STRUCTURE IS NOW A VERBAL REPORT.



TO: Board of Directors
Agenda Item No. 6c

FROM: Jim Beck, Executive Director

DATE: July 10, 2019

SUBJECT: Fiscal Year 2019-20 Budget Adoption

Issue

Adoption of the Fiscal Year 2019-20 Budget.

Recommended Motion

Adopt the Fiscal Year 2019-20 Budget.

Discussion

A draft of the Fiscal Year (FY) 2019-20 budget was presented at the May 1, 2019 Cuyama Basin Groundwater Sustainability Agency (CBGSA) Board meeting. During that meeting we received direction from the Board to reduce the proposed \$1.4 million budget to \$1 million. Hallmark Group met with the budget ad hoc on May 13, 2019 to present the revised budget which is provided as Attachment 1.

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

Revised Cash Flow Projection - 5/28/2019

Year	Month	Executive Director Task Order 1	Executive Director Task Order 2	Executive Director Task Order 3	Executive Director Task Order 4	Legal Counsel	Grant Proposal	Prop 218 Basinwide	Audit	Insurance & CalMutual Membership	Travel Conference and Other	Contingency	Economic Analysis of Projects and Actions	Unbudgeted Meeting Participation and Outreach for W&C	Website Updates	Category 1 & 2 Grant Tasks	GSP Implementation Tasks (Basin-wide)	
		Expenses																
2017	December-17	26,375	3,875			17,577	39,151			2,451							43,199	
2018	January-18	14,463	4,038			2,889												
	February-18	14,630	2,300			3,727												
	March-18	16,600	2,825			2,376											378,393	
	April-18	11,194	4,450			2,732				9,039								
	May-18	14,301	8,175			4,283												
	June-18	16,547	4,338			2,592											443,978	
	July-18	14,427	2,475			2,417												
	August-18	15,100	4,075			3,366												
	September-18	14,134	3,800			1,778											432,197	
	October-18	14,787	2,875			3,017												
	November-18	20,331	1,750			2,477												
	December-18	15,488	1,525			5,280											329,425	
2019	January-19			21,360		6,224												
	February-19			15,963		3,954				100								
	March-19			20,302		3,769											228,918	
	April-19			21,409		1,635				9,315								
	May-19			16,370		3,500												
	June-19			16,370		3,500											247,682	
	July-19			16,370		5,000	40,000	10,000	16,000						2,997			
	August-19			16,370		5,000		10,000										
	September-19			16,370		5,000		10,000						39,586			82,500	
	October-19			16,370		5,000		10,000										
	November-19			16,370		5,000		10,000										
	December-19			16,370		5,000		10,000						39,586			52,500	
2020	January-20			16,370		5,000				200		20,000						
	February-20				15,634	5,000							11,979		2,997			
	March-20				15,634	5,000							11,979	32,230		45,000	64,011	
	April-20				15,634	5,000				11,000			11,979					
	May-20				15,634	5,000							11,979					
	June-20				15,634	5,000							11,979	32,230		45,000	96,017	
Total		208,379	46,500	226,363	78,170	137,093	79,151	60,000	16,000	32,105	-	20,000	59,896	143,630	5,994	2,328,792	160,028	

Admin & Support for DWR TSS	GSP Implementation Tasks (MA)	Total	Quarterly Totals	Beginning CBGSA Fund Balance	DWR Reimbursement Received	Proposed Participant Contributions	SBCWA Grant Additional Funds	Fund Balance	New CBGSA Obligations	CBGSA Payments	Shortfall	Ending CBGSA Fund Balance
			Revenues									
		132,629	132,629	-	-	-		-	132,629	-	132,629	(132,629)
		21,389										
		20,656										
		400,193	442,239	(132,629)	-	519,927		387,298	442,239	387,298	54,941	-
		27,415										
		26,759										
		467,455	521,630	-	-	476,881		476,881	521,630	521,630	-	(44,749)
		19,319										
		22,541										
		451,909	493,769	(44,749)	-	-		(44,749)	493,769	493,769	-	(538,518)
		20,680										
		24,559										
		351,718	396,956	(538,518)		-		(538,518)	396,956	(538,518)	935,474	(935,474)
		27,584										
		20,017										
		252,989	300,589	(935,474)	-	-	39,565	(895,909)	300,589	(895,909)	1,196,499	(1,196,499)
		32,359										
		19,870										
		267,552	319,781	(1,196,499)	1,627,192	-		430,693	319,781	319,781	-	110,913
		90,367										
		31,370										
18,848		172,304	294,041	110,913	228,918	-		339,831	294,041	294,041	-	45,790
		31,370										
		31,370										
		123,456	186,196	45,790	247,682	-		293,472	186,196	186,196	-	107,277
18,848		60,418										
		35,610										
	19,843	193,697	289,725	107,277	44,332	-		151,609	289,725	289,725	-	(138,117)
		43,613										
		32,613										
	29,765	235,624	311,851	(138,117)		-		(138,117)	311,851	311,851	-	(449,967)
37,696	49,608	3,689,405	3,689,405		2,148,124	996,808	39,565					



TO: Board of Directors
Agenda Item No. 6d

FROM: Lyndel Melton, Woodard & Curran (W&C)

DATE: July 10, 2019

SUBJECT: Discussion on Updated GSP Draft and Response to Comments

Issue

Discussion on updated Groundwater Sustainability Plan draft and response to comments.

Recommended Motion

None – information only.

Discussion

Provided as Attachment 1 is an update on the Groundwater Sustainability Plan (GSP) draft and Woodard & Curran's (W&C) response to comments matrix from the 30-day public comment period. Provided as Attachment 2 is a list of the GSP public draft commenters from the April 22nd through May 22nd 30-day public draft GSP comment period.

Cuyama Basin Groundwater Sustainability Agency

Discussion on Updated GSP Draft and Response to Comments

July 10, 2019

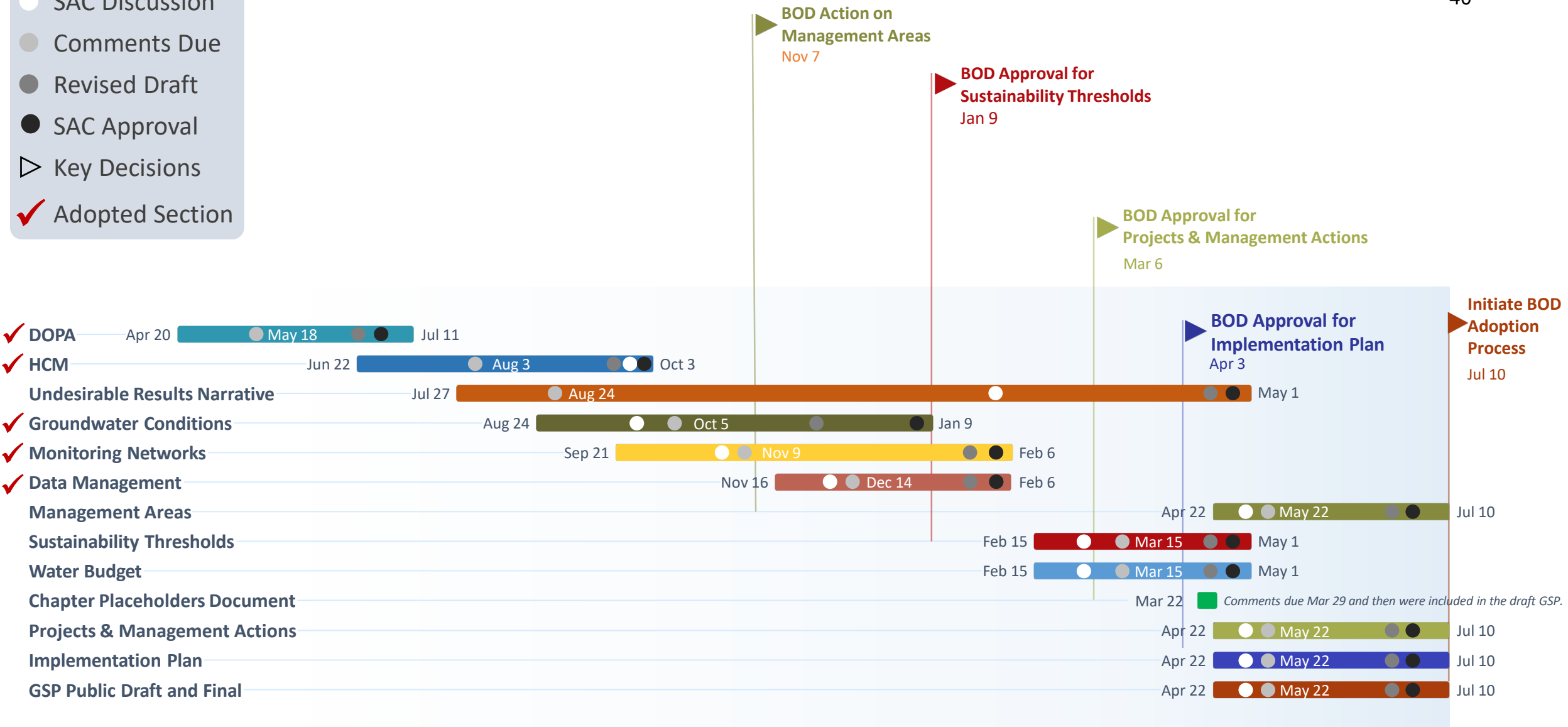
GSP Sections

1. Introduction
 - 1.1 Intro & Agency Information
 - 1.2 Plan Area
 - 1.3 Notice and Communication
2. Basin Settings
 - 2.1 HCM
 - 2.2 GW Conditions
 - 2.3 Water Budget

Appendix: Numerical GW Model Documentation
3. Undesirable Results
 - 3.1 Sustainability Goal
 - 3.2 Undesirable results statements
 - 3.2 ID Current Occurrence
4. Monitoring Networks
 - 4.1 Existing Monitoring Used
 - 4.2 GSP Monitoring Networks
5. Sustainability Thresholds
 - 5.1 Threshold Regions
 - 5.2 Minimum Thresholds, Measurable Objectives, Margin of Operational Flexibility, Interim Milestones
6. Data Management System

Appendix: DMS User Guide
7. Projects & Management Actions
8. Implementation Plan

- SAC Discussion
- Comments Due
- Revised Draft
- SAC Approval
- ▷ Key Decisions
- ✓ Adopted Section



2018

2019

Apr Jun Aug Oct Dec Feb Apr Jun

Today

Public Comments on Draft GSP

- Public Comments Received as of May 22
 - May 1 Workshop (40 participants, 70 comments)
 - Written comments from 27 individuals and organizations, including:
 - Central Coast Regional Board
 - CA Department of Fish and Wildlife
 - San Luis Obispo and Santa Barbara Counties
 - Cuyama Basin Water District/EKI
 - Twitchell Management Authority
 - Santa Maria Conservation District
 - The Nature Conservancy
 - Community Environmental Council
 - Cuyama Family Resource Center

Major Comments on which Board discussed and provided direction at June 5th Board meeting

- Sustainability Goal
- Reporting Threshold for Basinwide Undesirable Results
- Interim Milestones for Representative Wells
- Adaptive Management Triggers
- Model Uncertainty

Other Common Public Comments reviewed at June 5th Board meeting

- Not specific enough about steps to achieve sustainability
- Should be more explicit about undesirable results that existed prior to 2015
- Doesn't achieve measurable objectives or improve conditions
- Should include guidance on water use efficiency
- Should include an economic evaluation
- Valley can't afford the plan
- Sustainability Criteria should be revised
 - Water quality
 - Subsidence
 - Interconnected surface water
- Groundwater Dependent Ecosystems are not documented or protected
- Pumping restrictions/allocation should apply outside Central Area
- Comments on potential impacts of stormwater capture and cloud seeding
- Moratorium on new wells
- Connection between glidepath and potential for undesirable results
- Cost allocation should be based on groundwater use

Comment Response/GSP Approach

- Two common themes regarding level of detail in GSP:
 - The plan needs more detail
 - The plan has more detail than the data supports
- Recommended approach:
 - The plan satisfies DWR requirements
 - The plan includes the processes needed to develop and implement monitoring and management actions over the first five years

Comment Response/GSP Approach

- Comments about economic impacts, implementation costs and cost allocation approach
- Recommended approach:
 - We are completing an economic analysis
 - Estimated implementation costs included in the GSP
 - CBGSA board is reviewing costs and considering potential cost allocation approaches

Final Draft GSP

- Final Draft reflects:
 - Updates in response to comments received on Public Draft
 - Board direction provided at June 5th meeting
- Seeking Board approval to issue a Notice of Intent to adopt the Final Draft GSP

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - General
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
1	Meg Brown						Transparency of decision making during implementation of the Plan: The Draft Plan could be improved with a clear description of how, moving forward, there will be transparency in implementation and decision making.	The CBGSA Board of Directors holds responsibility for plan implementation. Decisions about implementation and funding will occur through publicly noticed board meetings. Groundwater monitoring data will be available publicly through the CBGSA data management system.
2	Sigrid Wright	CEC					Develop a 20-year GSP implementation timeline, including individualized pumping management plans, detailed incentives for sustainable management, and enforcement measures to ensure compliance.	During the first five years of implementation, the CBGSA will develop and approve the groundwater pumping allocations and the enforcement measures, consistent with their authorities under SGMA.
3	Sigrid Wright	CEC					Include soil health and soil conservation tools as Best Management Practices in the GSP, including cover cropping, mulch application, and other well document NRCS conservation practices.	Soil and water conservation measures are available from many sources to all water users in the Cuyama Basin. The GSP does not include these as required actions for water users. The water management tools included groundwater pumping allocations, which will be implemented over the next five years.
4	Sigrid Wright	CEC					Include a reference list of State and Federal funding programs to assist land managers in adopting groundwater Best Management Practices, including the CA Healthy Soils Program (HSP), the State Water Efficiency and Enhancement Program (SWEEP), the NRCS Environmental Quality Incentives Program (EQIP) and the USDA Farm Bill Funding.	The CBGSA and the Cuyama Basin Water District may make this information available to water users during implementation to assist water users subject to pumping allocations.
5	Community Workshops	Community					SGMA, the GSP should include: Clarification that the development and implementation of the GSP is a government mandate under SGMA, but implementation will be paid for by landowners in the Cuyama Basin.	The development of the GSP has been funded by a grant from the Department of Water Resources and local matching funds from the 6 local organizations represented on the CBGSA board (counties, water district, and community services district). The CBGSA board continues to discuss costs funding approaches for implementing the GSP.
6	Community Workshops	Community					SGMA, the GSP should include: Clarification that SGMA was not enacted to improve water quality or increase water flows.	The SGMA requirements for achieving sustainability for the Cuyama Basin are described in the GSP, in the Checklist included as an Appendix to Chapter 1, which lists the requirements specified by DWR. Additional discussion of this topic could be held with the GSA Board
7	Community Workshops	Community					SGMA, the GSP should include: Explain what happens if the GSP fails -- what does state control look like?	While SGMA and the GSP resolutions provide general information on what would happen if the GSP fails, there are many uncertainties regarding that outcome. Therefore, it would not be helpful to include this in the GSP document, but this topic can be discussed in future GSA meetings
8	Community Workshops	Community					Economic Analysis & Impacts, the GSP should include: Economic impact analysis.	An economic analysis will be performed and the results will be presented to the Board
9	Community Workshops	Community					Economic Analysis & Impacts, the GSP should include: Explanation of economic impacts from the groundwater cutbacks. The cutbacks could destroy the entire Valley's economy. The economic analysis needs to address the fact that the people who live in the Cuyama Basin work on the agricultural lands or support those that do.	An economic analysis will be performed and the results will be presented to the Board
10	Community Workshops	Community					Economic Analysis & Impacts, the GSP should include: Explanation of how the economic impacts will be addressed as an offer on a ranch was withdrawn after the need for an 80% reduction in pumping was announced.	An economic analysis will be performed and the results will be presented to the Board
11	Community Workshops	Community					Economic Analysis & Impacts, the GSP should include: Detailed plan for the cost for implementation taking into account that if the costs are put on the smaller landowners, they will go out of business. Protection for small landowners from unreasonable costs.	The CBGSA board continues to discuss costs and funding approaches for implementing the GSP.
12	Community Workshops	Community					Implementation Costs and Funding, the GSP should include: Define who is paying for what, what are the costs to residents.	The CBGSA board continues to discuss costs and funding approaches for implementing the GSP.
13	Community Workshops	Community					Implementation Costs and Funding, the GSP should include: Explanation of how the disadvantaged communities in the Cuyama Basin can afford to continue this effort, year after year at \$1 million plus per year.	The CBGSA board continues to discuss costs and funding approaches for implementing the GSP.
14	Community Workshops	Community					Implementation Costs and Funding, the GSP should include: Consideration that when identifying funding for implementation, given that the Cuyama Basin is so severely overdrafted, decreasing water consumption will severely impact the finances of all those in the Basin whose livelihood depends on water use. Sacramento needs to find a way to pay for changes required by the GSP for the benefit all of California.	The CBGSA board continues to discuss costs and funding approaches for implementing the GSP, including potential state grants.
15	Community Workshops	Community					Implementation Costs and Funding, the GSP should include: Appropriate agencies should be seeking grant funding now for implementation.	The CBGSA board continues to discuss costs and funding approaches for implementing the GSP, including potential state grants.
16	Community Workshops	Community					Implementation Costs and Funding, the GSP should include: Information about how long grants will be available.	This information is not available as it is unknown what future grant opportunities will be available.
17	Community Workshops	Community					Implementation Costs and Funding, the GSP should include: Provide funding for houses that have to drill deeper for groundwater.	The groundwater monitoring and minimum thresholds for groundwater levels included in the GSP are intended to protect water users. During the first five years of implementation, additional monitoring and pumping information will improve understanding of what will be needed to maintain groundwater levels.
18	Community Workshops	Community					Model/Data, the GSP should include: Data gathering methods that are consistently updated so there is a consistent view provided.	Data collection methods will be developed during GSP implementation.
19	Community Workshops	Community					Model/Data, the GSP should include: Explanation of why long-term economic decisions are being made on uncertain groundwater modeling.	The groundwater model is the best available information on Basin groundwater conditions. Implementing the GSP will adapt to new information and updated modeling forecasts as pumping allocations are implemented.
20	Community Workshops	Community					Model/Data, the GSP should include: Explanation that decisions are being made based on model results without a clear understanding of how wrong the predictions might be. There are ways to quantitatively express the uncertainty in the model, and this should be included. Every model has uncertainty.	Uncertainty information has been added to Chapter 2 and to Appendix C.
21	Community Workshops	Community					Model/Data, the GSP should include: Clarification of the quantitative sensitivity analysis (of the model) to identify parameters that have an outsized effect on hydraulic heads and overdraft/water balance.	Uncertainty information has been added to Chapter 2 and to Appendix C.
22	Community Workshops	Community					Model/Data, the GSP should include: Clarification of uncertainty inputs (to the model) in terms of the range of probably outcomes.	Uncertainty information has been added to Chapter 2 and to Appendix C.
23	Community Workshops	Community					Model/Data, the GSP should include: What the three biggest data gaps in the model are.	Model data gaps are described in Appendix C.
24	Community Workshops	Community					Model/Data, the GSP should include: More information that validates if new groundwater users are impacting Cuyama Basin groundwater or not.	The numerical modeling includes all current groundwater users.
25	Community Workshops	Community					Model/Data, the GSP should include: Account for domestic water use.	Domestic water use is included in the numerical model.
26	Community Workshops	Community					Russell Fault, the GSP should include: Clarification of whether the Russell fault restricts groundwater flow or if that is still "up in the air."	The best available information on this issue is presented in Chapter 2. Understanding of the Russell Fault will improve as additional information is gathered during GSP implementation.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - General
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
27	Community Workshops	Community					Russell Fault, the GSP should include: Additional studies to validate if the fault is in fact restricting groundwater movement.	The best available information on this issue is presented in Chapter 2. Understanding of the Russell Fault will improve as additional information is gathered during GSP implementation.
28	Community Workshops	Community					Minimum Thresholds/Interim Milestones, the GSP should include: Explanation as to why Minimum Thresholds are set too low to achieve sustainability before the groundwater is further severely depleted.	The groundwater monitoring and minimum thresholds for groundwater levels included in the GSP are intended to protect water users. During the first five years of implementation, additional monitoring and pumping information will improve understanding of what will be needed to maintain groundwater levels.
29	Community Workshops	Community					Minimum Thresholds/Interim Milestones, the GSP should include: Improved explanation of the interim milestones. They should be set higher than the minimum thresholds.	Interim Milestones have been adjusted per direction from the CBGSA Board
30	Community Workshops	Community					Minimum Thresholds/Interim Milestones, the GSP should include: Clarification of the Minimum Thresholds and Undesirable Results in Chapter 3 – setting the percentage of wells that fall below minimum threshold at 30% is a problem if all wells in a management area go below the minimum threshold yet do not exceed the 30% measure for determining undesirable results.	This issue was discussed at the CBGSA Board meeting on 6/5/2019, where the Board determined to maintain the 30% of wells criteria.
31	Community Workshops	Community					Minimum Thresholds/Interim Milestones, the GSP should include: Explanation of why the minimum thresholds do not protect for continual overdraft.	The minimum thresholds do limit future overdraft potential in the Basin.
32	Community Workshops	Community					Minimum Thresholds/Interim Milestones, the GSP should include: Explanation of why the interim milestones are set the same as the minimum thresholds. What happened to the MoOF (margin of operational flexibility), this GSP is looking to do nothing better than the very worst that is acceptable.	Interim Milestones have been adjusted per direction from the CBGSA Board
33	Community Workshops	Community					Glide Path, the GSP should include: Better clarification of the glide path.	The glide path describes the progressive implementation of pumping allocations to bring the Basin into balance. During the first five years of implementation, additional monitoring and pumping information will improve understanding of necessary pumping allocations and the glide path.
34	Community Workshops	Community					Glide Path, the GSP should include: Setting reasonable Undesirable Results that reflect the glide path.	The GSP reflects minimum thresholds and a glide path that were determined by the GSA Board
35	Community Workshops	Community					Glide Path, the GSP should include: Connection of Undesirable Results to the glide path.	The GSP reflects minimum thresholds and a glide path that were determined by the GSA Board
36	Community Workshops	Community					Glide Path, the GSP should include: Consideration of starting the pumping allocations/reductions sooner than 2023.	The schedule for pumping allocations in the plan was determined by the GSA Board, considering the time needed to establish allocation and pumping monitoring procedures.
37	Community Workshops	Community					Glide Path, the GSP should include: Implementation of the allocation plan by 2038.	The glide path reflects pumping allocations to achieve basin balance by 2038.
38	Community Workshops	Community					Monitoring Network, the GSP should include: Data gathering methods that are consistently updated so there is a consistent view provided.	GSP implementation includes five year updates of the GSP to incorporate improved monitoring and reporting.
39	Community Workshops	Community					Monitoring Network, the GSP should include: Agreement that the counties will play an active role in the monitoring network.	The counties are represented on the CBGSA board and have played an active role in monitoring and data collection.
40	Community Workshops	Community					Monitoring Network, the GSP should include: Validation that the monitoring network is truly representative.	The CBGSA will expand and review the monitoring network through the first five years of implementation.
41	Community Workshops	Community					Monitoring Network, the GSP should include: Water quality monitoring so it can be dealt with, include water quality planning.	The CBGSA will implement monitoring for total dissolved solids to identify if groundwater pumping is altering groundwater quality.
42	Community Workshops	Community					Monitoring Network, the GSP should include: Standardization of monitoring wells.	The CBGSA will expand and review the monitoring network through the first five years of implementation.
43	Community Workshops	Community					Monitoring Network, the GSP should include: Monitoring wells are not representative of local production.	The CBGSA will expand and review the monitoring network through the first five years of implementation.
44	Community Workshops	Community					Monitoring Network, the GSP should include: Better monitoring network and stream gauges.	The CBGSA will expand and review the monitoring network through the first five years of implementation.
45	Community Workshops	Community					Monitoring Network, the GSP should include: Who pays for the new groundwater monitoring wells?	Options for financing are included in Chapter 8. The CBGSA board continues to discuss costs and funding approaches for implementing the GSP.
46	Community Workshops	Community					Water Quality Monitoring, the GSP should include: Monitoring of other water quality constituents that are of great concern for human and animal consumption, such as nitrates, arsenic, etc. Explain why TDS (total dissolved solids) are the only constituent considered. To avoid the consequences of water quality getting worse as pumping continues, more than just TDS should be monitored.	The rationale for TDS monitoring for water quality is described in Chapter 4.
47	Community Workshops	Community					Water Quality Monitoring, the GSP should include: Track groundwater quality with age date of multiple constituents.	The monitoring plan does not include constituents related to age dating of water because this is not required by SGMA. This could be added if desired by the CBGSA Board.
48	Community Workshops	Community					Water Quality Monitoring, the GSP should include: Water quality data from other agencies; it already exists.	The GSA can utilize data collected by other agencies in decision making going forward.
49	Community Workshops	Community					Water Quality Monitoring, the GSP should include: Explanation of why all wells cannot be monitored.	Monitoring all wells is cost prohibitive
50	Community Workshops	Community					Environment, the GSP should include: Planning for potential for degradation of the environment, e.g., increased dust due to fallowing of land during implementation.	Additional monitoring of groundwater dependent ecosystems is included in the implementation plan.
51	Community Workshops	Community					Environment, the GSP should include: Further analysis of the potential for destruction of native habitat, which is already occurring.	Additional monitoring of groundwater dependent ecosystems is included in the implementation plan.
52	Community Workshops	Community					Environment, the GSP should include: Increased effort to protect Groundwater Dependent Ecosystems (GDEs).	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.
53	Community Workshops	Community					Environment, the GSP should include: Protection for GDEs -- The GSP does not recognize, quantify, or protect GDEs and it should. Basin overdraft has dried up most of the GDEs, the GSP must protect those that remain.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.
54	Community Workshops	Community					Water Conservation, the GSP should include: Information about conservation by all groundwater users in the Cuyama Basin. All water users in the Cuyama Basin need to be encouraged to change their water use practices. Growers need to be encouraged to change to crops that use less groundwater, change watering systems to conserve more groundwater, let some fields remain unplanted. Private citizens should be encouraged to greatly reduce their water waste, i.e. showering, hand washing dishes, watering gardens.	Water conservation measures can be considered by private landowners in response to pumping allocations. Water conservation measures are available from many sources to all water users in the Cuyama Basin.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - General
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
55	Community Workshops	Community					Water Conservation, the GSP should include: Clarification that if residents conserve water use, their bills do not go down.	Residential water use is a very small proportion of groundwater pumping in the Basin. Mechanisms for GSP funding will be determined during GSP implementation.
56	Community Workshops	Community					Water Conservation, the GSP should include: Clarification about the GSA's role in recommending growers grow a different crop that uses less water.	Changes in crop mix can be considered by private landowners in response to pumping allocations.
57	Community Workshops	Community					Allocations, the GSP should include: Allocation methodology that provides equity among all groundwater users.	The CBGSA will develop the allocation methodology in the first three years of GSP implementation.
58	Community Workshops	Community					Allocations, the GSP should include: Allocation methodology that is basin-wide.	The CBGSA will develop the allocation methodology in the first three years of GSP implementation. Currently, per Board Direction areas outside of the management areas are not given allocations. However, allocations for other parts of the Basin could be implemented if desired by the Board.
59	Community Workshops	Community					Allocations, the GSP should include: Protections for residential groundwater users.	The specifics for how pumping allocations will be implemented will be determined during the first three years of GSP implementation.
60	Community Workshops	Community					Allocations, the GSP should include: Definition of and exclusion of "de minimus" groundwater users from being subject to GSP implementation.	The Board has not provided specific direction on de minimus users. This will be determined during GSP implementation. Under SGMA, the GSA can establish pumping allocations for de minimus users (pumping of less than 2 acre-feet per year for residential use), but cannot require monitoring of pumping.
61	Community Workshops	Community					Allocations, the GSP should include: Information/determination of how the CBGSA will treat a well that is used for irrigation and residential use.	The specifics for how pumping allocations will be implemented will be determined during GSP implementation.
62	Community Workshops	Community					Allocations, the GSP should include: Information/determination of how the CBGSA will treat new well water users.	Water Code section 10725.6 authorizes a GSA to require registration of a well within its management area. Additionally, section 10726.4(a)(2) authorizes a GSA to control pumping by regulating, limiting, or suspending extractions from individual wells or extractions from wells in the aggregate, construction of new groundwater wells, enlargement of existing wells, or reactivation of abandoned groundwater wells, or otherwise establishing groundwater extraction allocations. However, that same subsection provides that any limitation on pumping by a GSA shall not be construed to be a final determination of rights to pump groundwater. So whatever controls on pumping a GSA implements needs to address current and projected conditions, and be adaptive over the life of the GSP. The GSA will need to decide as data is developed and the model is refined which of these tools should be employed and for how long.
63	Community Workshops	Community					Allocations, the GSP should include: Address the vulnerability of areas to new wells and/or increased pumping where there is no allocation planned currently.	The CBGSA will develop the allocation methodology in the first three years of GSP implementation. Currently, per Board Direction areas outside of the management areas are not given allocations. However, allocations for other parts of the Basin could be implemented if desired by the Board.
64	Community Workshops	Community					Projects, the GSP should include: What are the impacts and risks associated with cloud seeding?	This is discussed in Chapter 7
65	Community Workshops	Community					Future Well Drilling, the GSP should include: Explanation of how future well drilling will be addressed.	Water Code section 10725.6 authorizes a GSA to require registration of a well within its management area. Additionally, section 10726.4(a)(2) authorizes a GSA to control pumping by regulating, limiting, or suspending extractions from individual wells or extractions from wells in the aggregate, construction of new groundwater wells, enlargement of existing wells, or reactivation of abandoned groundwater wells, or otherwise establishing groundwater extraction allocations. However, that same subsection provides that any limitation on pumping by a GSA shall not be construed to be a final determination of rights to pump groundwater. So whatever controls on pumping a GSA implements needs to address current and projected conditions, and be adaptive over the life of the GSP. The GSA will need to decide as data is developed and the model is refined which of these tools should be employed and for how long.
66	Community Workshops	Community					Future Well Drilling, the GSP should include: Discussion of a possible moratorium on well drilling permits issued by the counties.	Water Code section 10725.6 authorizes a GSA to require registration of a well within its management area. Additionally, section 10726.4(a)(2) authorizes a GSA to control pumping by regulating, limiting, or suspending extractions from individual wells or extractions from wells in the aggregate, construction of new groundwater wells, enlargement of existing wells, or reactivation of abandoned groundwater wells, or otherwise establishing groundwater extraction allocations. However, that same subsection provides that any limitation on pumping by a GSA shall not be construed to be a final determination of rights to pump groundwater. So whatever controls on pumping a GSA implements needs to address current and projected conditions, and be adaptive over the life of the GSP. The GSA will need to decide as data is developed and the model is refined which of these tools should be employed and for how long.
67	Community Workshops	Community					Future Well Drilling, the GSP should include: Confirmation that it is a requirement for all new wells to be reported to the CBGSA.	Water Code section 10725.6 authorizes a GSA to require registration of a well within its management area. Additionally, section 10726.4(a)(2) authorizes a GSA to control pumping by regulating, limiting, or suspending extractions from individual wells or extractions from wells in the aggregate, construction of new groundwater wells, enlargement of existing wells, or reactivation of abandoned groundwater wells, or otherwise establishing groundwater extraction allocations. However, that same subsection provides that any limitation on pumping by a GSA shall not be construed to be a final determination of rights to pump groundwater. So whatever controls on pumping a GSA implements needs to address current and projected conditions, and be adaptive over the life of the GSP. The GSA will need to decide as data is developed and the model is refined which of these tools should be employed and for how long.
68	Community Workshops	Community					Process/Other: Fees set by the CBGSA will go toward the 5-year reporting requirements.	This can be considered during GSP implementation

**Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - General
June 24, 2019**

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
69	Community Workshops	Community					Process/Other: "Analysis paralysis" could keep the CBGSA Board from taking action.	Comment noted.
70	Community Workshops	Community					Process/Other: There needs to be a commitment on the part of the CBGSA Board to implement the GSP instead of business as usual.	Comment noted.
71	Community Workshops	Community					Process/Other: We were told that the CBGSA Board members do not care – this is worrisome.	Comment noted.
72	Community Workshops	Community					Process/Other: During CBGSA Board meetings, the board members need to listen rather than being on their smartphones during the meetings.	Comment noted.
73	Community Workshops	Community					Process/Other: There needs to be transparency by all parties during GSP implementation.	The CBGSA Board of Directors holds responsibility for plan implementation. Decisions about implementation and funding will occur through publicly noticed board meetings. Groundwater monitoring data will be available publicly through the CBGSA data management system.
74	Community Workshops	Community					Process/Other: Long-term implementation should engage the upcoming generation.	Comment noted.
75	Community Workshops	Community					Process/Other: Ensure that the GSP works for (1) groundwater levels, (2) water quality, and (3) allows for an adequate environment in the Cuyama Basin.	Comment noted.
76	Community Workshops	Community					Process/Other: Better trust that the pumpers will cooperate, report and pay.	Comment noted.
77	Community Workshops	Community					Process/Other: This is the 8th groundwater report done in the Cuyama Basin. We have known about the overdraft problem for the last 50 years. This is nothing new. How are we going to change business as usual behavior? If this plan is not improved drastically, we will know SGMA to mean Same old Groundwater Mining Activities.	Comment noted.
78	Matt Young	SBCWA					This is now a single document, and should be better integrated. Along those lines, please include a cover page for the GSP. Please include be a glossary and acronym list for the GSP as a whole, rather than chapter by chapter. Finally, the chapter introductions declaring the chapter to be a part of the GSP are no longer necessary.	These changes have been made to the document.
79	Joe Haslett						Overall any statement or description that is about the Central Basin Area needs to be identified as such not the entire CBGSA, it is misleading and disingenuous to the reader of the report and plan.	The discussion of water budgets and groundwater in the GSP focuses on the entire basin because that is what is required by SGMA. Discussion of regional differences within the Basin are included in many sections of the GSP, which make clear that the primary issues are in the Central Basin.
80	David and Karen Lewis						First, as mentioned in the last meeting, it is our hope that water allocation will be based on water/acre rather than historical usage. This not only see ms more fair but incentivises careful use while some are watering a lot in hopes it will be based on historical usage. Second, we want assurances tha t once water allocations are in place there would be a plan for redistribution of water if some ranches left or shut down. This is opposed to just addin g this to further restriction of water in the Cuyama Valley. Our Story: We adopted twin boys who have special needs from SLO county 22 years ago. We bought land and built a home 12 years ago here in the Valley. We planted 35 acres of Pastaccio trees 3 years ago. We are careful with our wate r irrigation. However, the demands for those trees will increase over the next few years. We have put all our funds and retirement into this property an d the trees were to be our support on retirement in the next few years as well as support for our kids. When we heard about the water restrictions we accepted an offer on our property that was below it's value. We would then have left California in order to financial suevive. Then the "80 percent" re striction was announced. The next day the offer was withdrawn. Now we are trying to find a way to survive, save our ranch, plan for our future with all the controls and associated costs that are coming. Dave is a Civil Engineer, who worked for SB county, is is now working on Bakersfield. Karen is a Physical Therapist at Marian Reginal Medical Center in Santa Maria. We hire locals and teens when we need help. These water restrictions may des troy our future finances and leave our two young men to be cared for by government sources. I was told that someone on the board said they do not c are about the impact this plan may have on ranchers. Every family has a story. Most are not big money ranchers but hard working individual ranches . Please consider the best plan to help sustain the valley and not just the water reserves.	The specifics for how pumping allocations will be implemented will be determined during GSP implementation.
81	Sue Blackshear						The Cuyama Basin is a relatively poor region financially. To cut back water usage and at the same time financially support an agency (the GSA) to implement the GSP will be a great financial strain. The GSP does not successfully address the problem of how it will financially implement the GSP over the next 20 years. In the interest of real change for the benefit of the Cuyama Region and California as a whole, I would suggest that the state offer financial assistance to the Cuyama Basin so that a refined GSP, when finally adopted, can be successfully implemented.	The CBGSA board continues to discuss costs and funding approaches for implementing the GSP, including potential state grants.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - General
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
82	6 District Directors and Officer of the Board	Santa Maria Valley Water Conservation District					<p>We the SMVWCD were formed under the "New" California Water Code, and specifically designed to investigate, identify, develop solutions and maintain a balanced conveyance to Recharge Groundwater and conducts the primary Flood Control component in concert with the other Sister Elements that manage the other Elements, that serve the water users of the Santa Maria basin (3-012). SMVWCD is the operator of record, paid the original loan off in 2007 making Twitchell Dam (TD) a transitional Facility, we have been the only operator of this facility and remain accountable and in communication within our chain of Command and Communication. Recent changes have been the Adjudication of Twitchell Yield making those waters a primary component and should be central to the foundation of your Project. Our District should have been considered and central to your Formation, Mission and Continuing Operation. Adding SMVWCD to your active mailing list will go a long way to keeping us informed. "Other Water Partners" should be added to your mailings as to keeping all parties informed and keep you in compliance with all "Necessary Parties" having ownership in the waters a.k.a of Twitchell Yield (TY). SMVWCD does not own or use water, it's our task to Operate the TD Facility, Manage Inflows, Cuyama and other inflows, report and take action to maintain "the Proper Function and Flow of the TY they only conveyance of water from TD is through the DWR Diversion under the "use of water", the only acceptable extraction is from a water well.</p> <p>Water Users of the Santa Maria Basin (3-012 and interconnected sub-basins) have shared the surface and sub-surface flows from the Cuyama Basin (3-013) and beyond to and including the Watershed beyond 3-013 forever, the "Project Area" of the subject GSP is the Primary Water Supply for everyone up and downstream from your Project. It would be an understatement to say we collect just the benefits that come with the surface and sub-surface water flows that gravitate to the Pacific Ocean. We have accumulated many millions of yards of sediment from the Cuyama Valley and Federal Properties.</p> <p>The SMVWCD was formed after a long process that started in the 1920's by a dedicated group of Community Members, Elected and Appointed Members that used 1928, 29 and 1930 Water Law that is the foundation to the now named California Water Code. to create an Agency A.K.A. SMVWCD in 1936, to help develop laws and processes to finance and bring under control the flows of the Cuyama River at Twitchell Reservoir (you call it Twitchell Lake) in 1954. Much the same path as any other water user. Our operation predates yours and the conditions of the Adjudication further alters water use of "Twitchell Yield" We at SMVWCD thank you for the great document and look forward its development and implementation.</p> <p>The SMVWCD along with the Water Users and Purveyors in our Basin along with the South Santa Barbara County Agencies support the "Weather Modification Process" to "supplement" Cuyama and Huasna River meteoric flow into Twitchell and all the other water storage Reservoirs. SMVWCD uses a Diversion Permit to directly recharge the groundwater in Basin 3-012 and beyond, this is the Primary water supply many water users that your document fails to recognize.</p>	The discussion of stormwater capture in Chapter 7 notes the need to consider downstream water rights.
83	John Comstock	New Cuyama Resident					<p>I haven't read the Draft GSP but I hope the water table in the Cuyama valley rises. One thing I notice when I ride my bike past the farms is that sometimes there are sprinklers blasting full water in the middle of a hot summer day and it seems that a lot of this water evaporates before it even touches the ground. Here's what I recommend: Hire a person or company that knows how to install efficient irrigation systems and make the farmers install these systems. The State of California would be wise to help farmers pay for these efficient irrigation systems. Also, if this hasn't already happened, put a meter on all wells in the Cuyama valley to measure the volume of water being pulled out of the ground by farmers, charge the farmers a nominal fee based upon usage, and give this money to Cuyama Community Services District to help pay for their water operation.</p>	During the first five years of implementation, the CBGSA will develop and approve the groundwater pumping allocations and monitoring and enforcement measures, consistent with their authorities under SGMA.
84	Joshua Bower						<p>...I wanted to presence a number of shortcomings with the Draft GSP. I want to start by saying that I live in a place (Quail Springs) whose impact on our spring has been positive, as more and more water flows each year since our arrival and the banishment of the grazing operations that had deforested the spring and drained the wetland. This is an example of a human impact that has not been negative or neutral but rather positive. We as humans have the power to continue doing harm by being an extractive force or we can be regenerative and live with an ethic of fair share for all, including the voiceless. How can farming continue given this new water budget? This would seem to imply, to the industrial carrot farmers of this valley, a change that would be incompatible with their financial interests. This is far from the case. There are examples in this valley of dry farmed grapes and olives, whose sale is earning a high desert premium, and whose water usage per acre is little to nothing once the crops are established (the result of which is also carbon sink and healthier soils as opposed to the tilling operation that most of these farmers employ year after year). This feels like a win for all involved, it just requires that farmers turn away from crops with unsustainable irrigation requirements towards perennial crops like goji berries, grapes, olives, jujubes, pistachios etc that can earn more money per acre and will at the same time be in accordance with the 2040 plan for sustainability (of which little sustenance has been heard). Innovation is key - the ecosystem of people, plants, animals, and soil in this valley cannot afford more groundwater mining in this area. Their lives depend on a change toward a more regenerative usage of groundwater. As the rest of California looks to the Cuyama Valley as an example, we must keep in mind our grandchildren and the communities of flora and fauna 100 years from now and beyond that depend on our actions today.</p>	The specifics for how pumping allocations will be implemented will be determined during GSP implementation. Changes in crop mix can be considered by private landowners in response to pumping allocations.
85	Cheryl Tomchin	Tomchin Family Charitable Foundation					<p>The GSP does not specify a plan or roadmap to achieve Sustainability with in the 20 year timeline; No Pumping Management plan, No plan to achieve the "Glide Path" approach to significant reductions, No Funding mechanism, No Incentives or Enforcements for compliance. No "nuts and bolts"...This Plan still needs the major components of a roadmap to achieving sustainability.</p>	The specifics for how pumping allocations will be implemented will be determined during GSP implementation.
86	Cheryl Tomchin	Tomchin Family Charitable Foundation					<p>Filling the Data Gaps need urgent attention during the first few years: Better Representation in the Monitoring Wells, Understanding the major Faults in the basin , Installation of Stream flow gauges on the bridges, More than one Subsidence monitor, and there is no recognition or monitoring for the loss of wetlands, seeps, springs and surface flow.</p>	Additional information will be developed during GSP implementation as the Monitoring Network is developed.
87	Cheryl Tomchin	Tomchin Family Charitable Foundation					<p>There is no plan to ever strive for the Measurable Objectives. No Interim Milestones were set above the Minimum Thresholds, some of which are below current conditions. This GSP appears to be tolerant of further dewatering with no achievable drought buffer and no recovery of the historic losses of groundwater from storage.</p>	The Interim Milestones have been revised per direction by the GSA Board
88	Cheryl Tomchin	Tomchin Family Charitable Foundation					<p>Groundwater Quality is of enormous importance to the Cuyama community. It is widely known that the water quality is poor in the Cuyama Valley, and will only worsen with continued overdraft. Not enough is known about the sources and flow rates of groundwater in the basin. Arsenic, Boron, Nitrates and Ions should be studied to help inform the Hydrologic Model and protect from any further Undesirable Results.</p>	Comment noted.
89	Cheryl Tomchin	Tomchin Family Charitable Foundation					<p>This Plan does not adequately address the desertification of the Basin as an Undesirable Result of groundwater overdraft. The declines of Interconnected Surface water with Groundwater and the resulting losses of Groundwater Dependent Ecosystems is a trend that must reverse. More data and protections are needed to ensure the vitality of the environmental beneficial users.</p>	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - General
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
90	Brenton Kelly	Quail Springs Permaculture					<p>This GSP is a reasonable compilation of the many published reports on Cuyama Groundwater in the last 50 years. Analysis of the geology and available monitoring data is sufficiently addressed to present the current conditions of overdraft in the Basin. However, the lack of sufficient time and/or money has been repeatedly used to excuse the lack of sufficient policy development and implementation directives to achieve Sustainability.</p> <p>Very little new and revealing data was developed for this Plan, as little if any on-the-ground evaluations or investigations were involved. This Plan does not contain the ways and means to achieve the necessary reduction of groundwater use of 50 to 67%. No Allocations, restrictions, incentives or fee assessments are presented. No well canvassing or ground truthing, no field tests, no installation of monitoring facilities, no additional measurements were made.</p> <p>The Economic analysis, which was suggested would contain crop evaluations, employment analysis, land value considerations and other stakeholder impacts, is inexplicable omitted.</p> <p>No Sustainability Goal was ever discussed at the SAC or GSA level to help build consensus on the goal of this whole Plan. There was no discussion about Undesirable Results that were pre-existing in 2015.</p> <p>Data Gaps continue to drive up the Model uncertainty and hamper GSA decision making. No connection has been made between the setting of Minimum Thresholds and basin-wide Sustainability or the connection to the "glide slope" approach to pumping restrictions.</p> <p>As vice-chair of the Standing Advisory Committee, I am grateful for all the very hard and time consuming work that has been put into the document. We have come a long way, under acknowledged constraints, and limitations. This GSP clearly conveys the need for urgent action, but fails to provide a viable Implementation Plan to take that action. This is good work done, but the job is not yet done.</p>	<p>The specifics for how pumping allocations will be implemented will be determined during GSP implementation. An economic analysis will be performed and presented to the GSA Board. The SAC and CBGSA discussed and revised the sustainability goal at the May 30 and June 5 meetings. Other comments are addressed as specific comments in each chapter.</p>
91	Diane Kukol for John Robertson	Central Coast Water Board					<p>In general, the Central Coast Water Board recommends that the number of chemical constituents included in the Minimum Thresholds (MT), Measurable Objectives (MO), and Interim Milestones (IM) be increased. The Central Coast Water Board agrees that MTs, MOs and IMs should be established for total dissolved solids (TDS), however, including only that single constituent is insufficient for determining whether a groundwater basin is being managed sustainably with respect to water quality or for determining if undesirable results are being addressed. Land use in the Cuyama Valley is dominated by commercial agriculture, an industry that utilizes a variety of chemicals and practices that pose threats to groundwater quality. Therefore, the Central Coast Water Board recommends expanding the list of chemical constituents in the MT, MO, and IM to include nitrate, arsenic, and major dissolved ions. The reasoning for this recommendation is described in detail below.</p>	<p>The rationale for why monitoring for just TDS in the Basin is provided in the Monitoring chapter. Based on this rationale, direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to include only TDS for monitoring and sustainability in the GSP. Therefore, the Monitoring and sustainability chapters will only include water quality sustainability indicators for TDS, unless alternate direction is provided by the Board.</p>
92	Diane Kukol for John Robertson	Central Coast Water Board					<p>The Central Coast Water Board recommends expanding the list of chemical constituents in the MT, MO, and IM to include nitrate: Nitrate contamination of groundwater from agricultural activities is widely documented in the Central Coast region, including within the Cuyama Valley. Approximately 9% of on-farm domestic wells in the Cuyama Valley exceed the human health standard for nitrate concentration in drinking water¹. The draft chapter states that the Cuyama Valley groundwater sustainability agency (GSA) does not have the authority to influence fertilizer use, and we are not suggesting the GSA should undertake such a regulatory role. However, the GSPs are required to implement thresholds and monitoring that can identify when undesirable results are occurring. Given the current impairment from nitrate in the basin and ongoing agricultural activity, it is appropriate to require thresholds and monitoring for nitrate in the Cuyama Valley groundwater basin. Nitrate monitoring is not unusual in agriculturally-dominated basins; for example, the Salinas Valley GSA is recommending an expanded suite of chemical constituents for its thresholds and monitoring. The recommendation in their most recent draft includes up to 25 different chemical constituents, including nitrate and arsenic². Finally, we recommend that nitrate be reported as nitrogen (nitrate as N), because this convention allows for easy comparison and summation (e.g., calculation of total nitrogen).</p>	<p>The rationale for why monitoring for just TDS in the Basin is provided in the Monitoring chapter. Based on this rationale, direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to include only TDS for monitoring and sustainability in the GSP. Therefore, the Monitoring and sustainability chapters will only include water quality sustainability indicators for TDS, unless alternate direction is provided by the Board.</p>
93	Diane Kukol for John Robertson	Central Coast Water Board					<p>The Central Coast Water Board recommends expanding the list of chemical constituents in the MT, MO, and IM to include arsenic: Arsenic is a toxic chemical compound that occurs naturally in relatively high concentrations in many of the sediments that form California groundwater basins, including those of the Central Coast. Groundwater data from the Water Board's GeoTracker GAMA3 website indicates that 12% of the wells in the Cuyama Valley groundwater basin exceed the maximum contaminant level (MCL) for arsenic in drinking water. The highest concentration recorded in the basin occurred in 2011 and was more than six times greater than the MCL. Furthermore, recent studies in the Central Valley of California⁴ and the Mekong Delta in Thailand⁵ have demonstrated that ground subsidence associated with groundwater over-pumping can mobilize arsenic by 'squeezing' it out of subsurface clay layers. The resulting mobilized arsenic can then enter groundwater and increase arsenic concentrations in nearby water supply wells. Because there is documented overdraft and subsidence in the Cuyama Valley, there is the potential risk of anthropogenically-induced arsenic contamination of groundwater due to arsenic mobilization from clay layers in the Cuyama Valley basin. Lastly, in addition to sediment-related sources, arsenic is a component in many pesticides commonly used on various crops. These factors suggest that arsenic should be included in the MTs, MOs, and IMs for the Cuyama Valley basin.</p>	<p>The rationale for why monitoring for just TDS in the Basin is provided in the Monitoring chapter. Based on this rationale, direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to include only TDS for monitoring and sustainability in the GSP. Therefore, the Monitoring and sustainability chapters will only include water quality sustainability indicators for TDS, unless alternate direction is provided by the Board.</p>
94	Diane Kukol for John Robertson	Central Coast Water Board					<p>The Central Coast Water Board recommends expanding the list of chemical constituents in the MT, MO, and IM to include major dissolved ions: Major dissolved cation and anion composition in groundwater reflects the source of recharge water, lithological and hydrological properties of the aquifer, groundwater residence time, and chemical processes within the aquifer. As such, major dissolved ions are valuable for identifying different groundwater types (via Piper or Stiff diagrams) and for "fingerprinting" source water from individual wells. In addition, ionic charge balance provides quality assurance that all the major ions are actually included in the analysis and that TDS concentrations are accurate. Finally, collection and analysis of major dissolved ion samples is easy and inexpensive, and the cost of the analysis is well worth the data provided, particularly if the well is already being sampled for other constituents.</p>	<p>The rationale for why monitoring for just TDS in the Basin is provided in the Monitoring chapter. Based on this rationale, direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to include only TDS for monitoring and sustainability in the GSP. Therefore, the Monitoring and sustainability chapters will only include water quality sustainability indicators for TDS, unless alternate direction is provided by the Board.</p>
95	Randy Sharer	Twitchell Management Authority	Ch 7 P. 69-70				<p>In particular, these comments concern the proposal to enhance Cuyama Basin groundwater yield through the diversion and off-stream recharge of stormwater flows in the Cuyama River (Draft GSP, Ch. 7, pp. 69-70.)</p> <p>Any new use of Cuyama River flows will be subject to senior downstream water rights. The potential yield and benefits of any such project for the Cuyama Basin may be severely limited. Twitchell Reservoir is licensed by the State of California to capture Cuyama River stormwater flows for subsequent release and recharge of the Santa Maria Groundwater Basin (see attached License for Diversion and Use of Water #10416 issued by the State Water Resources Control Board). In most years, the entire stormwater flow of the Cuyama River is captured in Twitchell Reservoir. Any proposed new use of the flows of the Cuyama River will be conditioned to have no impact on the operation of Twitchell Reservoir. Given this constraint, it may be infeasible to develop any new off stream recharge program dependent upon Cuyama River flows. (attached: License for Diversion and Use of Water #10416)</p>	<p>The discussion of stormwater capture in Chapter 7 notes the need to consider downstream water rights.</p>

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - General
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
97	Julie A. Vance	California Department of Fish and Wildlife Region 4	General				The GSP proposes three funding mechanisms to fund planning efforts — fees based upon water usage, fees based upon acreage within the Basin, or a combination of the two. Fees based upon water use is the most defensible method for funding planning efforts given that current and historical water use patterns are the primary drivers of Cuyama Basin overdraft conditions.	The CBGSA board continues to discuss costs and funding approaches for implementing the GSP.
98	John Orcutt						The GSP does not specify a plan or roadmap to achieve Sustainability with in the 20 year timeline; No Pumping Management plan, No plan to achieve the "Glide Path" approach to significant reductions, No Funding mechanism, No Incentives or Enforcements for compliance. No "nuts and bolts".	The specifics for how pumping allocations will be implemented will be determined during GSP implementation. The CBGSA board continues to discuss costs and funding approaches for implementing the GSP.
99	John Orcutt						Filling the Data Gaps need urgent attention during the first few years: Better Representation in the Monitoring Wells, Understanding the major Faults in the basin , Installation of Stream flow gauges on the bridges, More than one Subsidence monitor, and there is no recognition or monitoring for the loss of wetlands, seeps, springs and surface flow.	Additional information will be developed during GSP implementation as the Monitoring Network is developed.
100	John Orcutt						There is no plan to ever strive for the Measurable Objectives. No Interim Milestones were set above the Minimum Thresholds, some of which are below current conditions. This GSP appears to be tolerant of further dewatering with no achievable drought buffer and no recovery of the historic losses of groundwater from storage.	The Interim Milestones have been revised per direction by the GSA Board
101	John Orcutt						Groundwater Quality is of enormous importance to the Cuyama community. It is widely known that the water quality is poor in the Cuyama Valley, and will only worsen with continued overdraft. Not enough is known about the sources and flow rates of groundwater in the basin. Arsenic, Boron, Nitrates and Ions should be studied to help inform the Hydrologic Model and protect from any further Undesirable Results.	Direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to only include TDS for monitoring and sustainability in the GSP. Therefore, this Section will only include water quality sustainability indicators for TDS, unless alternate direction is provided by the Board.
102	John Orcutt						This Plan does not adequately address the desertification of the Basin as an Undesirable Result of groundwater overdraft. The declines of Interconnected Surface water with Groundwater and the resulting losses of Groundwater Dependent Ecosystems is a trend that must reverse. More data and protections are needed to ensure the vitality of the environmental beneficial users.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.
103	Richard and Susie Snedden	Kern County Landowners					We ask your Board to ensure that any and all CBGSA funding would exclude any imposition of fees or assessments based on acreage or parcels. SGMA law regulates groundwater extraction, not land use. Non-irrigated rangeland acres do not contribute to Basin overdraft. Proposition 218 requires that assessments, fees or taxes levied on property must provide a direct and special benefit to that property. We urge your Board to prepare a simple GSP chapter with a self-monitoring area for the rangeland-level groundwater users that confirms they will continue to be permitted by right, including domestic wells for rural housing, stock water wells, and landscaping around rural housing. The property owners within the Self-Monitoring area would not need to sign any agreements, lending simplicity and cost-effectiveness to the Plan.	The CBGSA board continues to discuss costs and funding approaches for implementing the GSP.
104	Richard and Susie Snedden	Kern County Landowners					Another critical issue of concern is the Draft Plan's proposal for cloud seeding to enhance rainfall. Cloud seeding within the proposed target area as shown in Figure ES-12 would create a rain shadow of drought for those of us Kern County landowners whose property lies directly north and east of the target area. The Los Padres National Forest is the significant property within the resulting rain shadow – after five years of drought the forest is a tinder box waiting to explode, without artificial rain manipulation making it worse. Cloud seeding also raises serious concerns about chemical residue and subsequent toxic exposure to humans and livestock as well as contamination of water. We believe that the many risks and costs associated with cloud seeding far outweigh any predicted benefit. We respectfully request that you remove the cloud seeding proposal from the plan. Capturing high stormwater flows in the Cuyama River and diverting it to recharge basins is the logical and less controversial alternative.	As noted in Chapter 7, additional study will be performed on cloud seeding prior to implementation
105	Richard and Susie Snedden	Kern County Landowners					The California Legislature clearly states that SGMA is intended to "enhance local management of groundwater." Therefore, we recognize that the CBGSA is allowed the discretion and flexibility to craft its non-irrigated, non-districted portion of the SGMA plan to meet the needs of grazing properties, like ours, which many of us believe have been erroneously included.	The specifics for how pumping allocations will be implemented will be determined during GSP implementation.
106	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					Many comments made during the development of the CBGSPd were not recognized or adopted. The Cuyama "technical forum group" (TFG) met monthly by telephone, but it was made clear by WC representatives that the TFG would not serve as "advisory committee" during the process and development of the GSP and comments would only be selectively addressed.	Comment noted.
107	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					Previous water investigations of the CGB have indicated an overdraft or imbalance of between approximately 15,000 to 30,000 Acre Feet per Year. These studies have been completed by CDWR, the United States Geological Survey (USGS), the Santa Barbara County Water Agency (SBCWA) and the United States Department of Agriculture (USDA). The studies by the USGS and SBCWA have been peer reviewed and published and are available on-line. Based on the peer reviewed and published Studies the median imbalance is approximately 27,000 Acre Feet per Year. All recent and published studies indicate the imbalance to come from the Main or Central Zone, as denoted by both the USGS (2011) and Woodard and Curran Consultants (2019).	Comment noted.
108	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					Hydrographs, water level trends and analyses in the Ventucopa Area show a seasonal depression separated by the Santa Barbara Canyon Fault Barrier where static water levels quickly move from near 100 feet below ground surface (bgs) to near 650 feet bgs. In this regards, the Santa Barbara Canyon Fault Boundary needs to be more closely examined.	The best available information on this issue is presented in Chapter 2. Understanding of the Santa Barbara Canyon Fault will improve as additional information is gathered during GSP implementation.
109	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					Recent data from the far western area of the Cuyama Basin, otherwise denoted the Cottonwood Subarea indicate a shallow and non-recharged area since the Cuyama River became ephemeral in the 1960's and 1970's, when multiple yearly cuttings of Alfalfa were realized, and rejected recharge from the Cuyama Basin ceased. During development of the CBGSP, some overlying extractors in the Cottonwood Subarea have informally requested an "exclusion" from the Sustainable Groundwater Management Act (SGMA) to be able to further lower groundwater levels than they were in January 2015, outside the essence of SGMA.	Comment noted.
110	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					Saltwater intrusion in the Cuyama Valley/Basin is not an issue. Several Faults and Mountainous Barriers stretching from New Cuyama to near Twitchell Reservoir create a barrier to salt water intrusion. Water emanating from the Cuyama Basin is very hard, as most of the geological formations are marine in origin. Total Dissolved Solids by itself is not a good water quality indicator for the Basin, due to background concentrations, and periodic full schedule nutrient sampling needs to be addressed during the CBGSP implementation period.	Direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to only include TDS for monitoring and sustainability in the GSP. Therefore, this Section will only include water quality sustainability indicators for TDS, unless alternate direction is provided by the Board.
111	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					The chronic lowering of groundwater levels, degradation of water quality due to "concentration" (over usage), and loss of GDE's is significant in the Cuyama Basin and needs to immediately be considered as any part of the CBGSP.	These issues are addressed in the GSP.
112	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					Recognized as one of the first developed Sustainable Groundwater Management Act (SGMA) Plans (GSP), the Cuyama Basin must be examined closely, as well as any objectives included in the plan to alleviate and address overdraft and imbalance. We see no dedicated resolve in the CBGSPd to alleviate imbalance. That would include pumping reductions or projects to augment recharge: Rainfall/Snowpack augmentation, off channel retention and/or percolation, Channel projects to increase direct percolation of stream seepage, or most importantly in the eyes of Yulalona Hydrology LLC Rangeland Management. Since the early 1990's the United States Forest Service (USFS) has neglected prescription burning in California, which has led to the most costly and destructive wildfires in California's history, including, but not limited to, the Zaca, La Brea, Thomas Fires and Camp Fires.	All of these actions were considered during CBGSA Board meetings. Pumping reductions, precipitation enhancement and stormwater capture have been included in the GSP in Chapter 7.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - General
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
113	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					Previous studies and collected data indicate that the majority (near 75%) of the recharge to the CGB derive from the Ventucopa Corridor, from near the Santa Barbara Canyon Fault to Frazier Park, the uppermost part of the Watershed. Differing rainfall patterns and snow melt affect the runoff in the Cuyama River Watershed, sometimes combined, resulting in outlier peak flows such as in 1998 and 2005 when California Highway 166 washed out and lives were lost.	Additional analysis can be performed during GSP implementation.
114	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					It is important to note that the Cuyama River Watershed and Drainage is very large; it drains 90 square miles in the upper watershed at Ozena, 866 square miles at USGS Gauging Station Cuyama River below Buckhorn Canyon 11136800 (NWIS Portal, 2019) and 1135 square miles to Twitchell Reservoir (USBR Portal, 2019). It is also important to note that the Cuyama River is not gauged between the inlet (Ozena) and the Outlet (USGS Gauging Station Cuyama River below Buckhorn Canyon 11136800) requiring losses or gains to the CGB to be estimated. This serves as a "data gap" that needs to be addressed during implementation of the CBGSP.	Discussion of the surface water stream gauges is included in Chapter 1.
115	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					The term "deep percolation" as part of the most recent study conducted by Woodard and Curran has been debated, but ignored in comments made during development of the CBGSP. Data from previous chemical analyses has indicated "ancient" (tens of thousand years old or older) water being produced out of the Main or Central Zone of the Basin (GAMA, 2007), with no traces of any anthropogenic tracers, such as, but not limited to, tritium. Certainly there is some stream seepage and direct percolation of rainfall as a part of "infiltration", but no recent evidence suggests any of this infiltration makes it through the vadose zone. This could be further examined utilizing piezometers and should be noted as another "data gap".	Additional analysis can be performed during GSP implementation.
116	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					During the 2007-2014 USGS-SBCWA collaborative study, hydrologic technicians and analysts were asked to no longer access Grimmway and Bolthouse properties (by Grimmway and Bolthouse representatives), including monitoring wells in in section 10N-25W sections 21 and 23 (based on the San Bernardino Baseline and Meridian). This study was initiated by Santa Barbara County Supervisor Joe Centeno, concerned about water usage in the Cuyama Valley, far pre dating SGMA. It is interesting that in 2017-18 "private" data (CBGSPd, figure 4-9) has been submitted from these large agricultural companies, with no oversight, quality assurance or control. It should also be noted that the USGS and SBCWA have recorded data from these areas during the 1970's to 2007, which are still helpful when calibrating simulations.	As discussed in Chapter 2, the reasonableness of private landowner data was assessed through comparison with USGS and DWR well data.
117	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					The 1997 Santa Maria Basin litigation, Santa Maria Valley Water Conservation District versus the City of Santa Maria, et al (consolidated for all legal purposes) (1-97-CV-770214) did not adequately address upstream (Cuyama River and Watershed) water rights, leaving the issue of Cascading Basins unresolved.	The discussion of stormwater capture in Chapter 7 notes the need to consider downstream water rights.
118	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					In the Cuyama Groundwater Basin (CBG), data gaps have been realized by analysts from multiple agencies working on water budgets. The fact that large agricultural entities have not acted in good faith since 2007 to produce adequate records of pumpage and static drawdown, combined with limited scientific peer reviewed data of the interactions between the Main or Central Zone with both the Ventucopa Uplands and Cottonwood Subarea, demonstrate the need for a "deep" (1200' bgs minimum) "depth dependent" monitoring well in Section 21 or 23 to adequately derive hydraulic properties of the deep older alluvium and Morales Formation.	The CBGSA will expand and review the monitoring network through the first five years of implementation.
119	Dennis Gibbs	Yulalona Hydrology LLC on behalf of SB Pistachios/Tri-County Pistachio Co/various stakeholders					Climatic Fluctuations are addressed as Appendix C of this memorandum to the Hallmark Group pertaining to Water Availability of the Cuyama Groundwater Basin. With the addition of Methane and Carbon from the melting permafrost (Sigmov, 2019), coupled with Carbon Dioxide being liberated from the Oceans (Goodridge, 2018) the CDWR tools for evaluating climate change are inadequate.	The GSP climate change analysis was prepared consistent with SGMA guidance from the Department of Water Resources. The GSA can consider additional climate change analyses during GSP implementation if desired.
120	Lynn Carlisle	Cuyama Valley Family Resource Center		General			Comment: As written, the CBGSP does not describe an actual Sustainability Goal for the Cuyama Basin and the steps to achieve that goal. Further, the Draft CBGSP does not explicit name a sustainable yield for the Basin, although the concept has been discussed at CBGSA meetings and mentioned in Chapter Two of the CBGSA. Essential elements of a concrete, achievable plan have not been established, as mandated by the Final GSP Emergency Regulations. Source: "354.24 Sustainability Goal: The Plan shall include a description of the sustainability goal, including information from the basin setting used to establish the sustainability goal, a discussion of the measures that will be implemented to ensure that the basin will be operated within its sustainable yield, and an explanation of how the sustainability goal is likely to be achieved within 20 years of Plan implementation and is likely to be maintained through the planning and implementation horizon." Source: "354.30. Measurable Objectives (e) Each Plan shall describe a reasonable path to achieve the sustainability goal for the basin within 20 years of Plan implementation, including a description of interim milestones for each relevant sustainability indicator, using the same metric as the measurable objective, in increments of five years. The description shall explain how the Plan is likely to maintain sustainable groundwater management over the planning and implementation horizon.	Chapter 3 includes a sustainability goal approved by the CBGSA Board. Undesirable results statements are also provided in Chapter 3, with minimum thresholds and measurable objectives provided in Chapter 5.
121	Lynn Carlisle	Cuyama Valley Family Resource Center		General			The Draft CBGSP was developed over nearly two years of meetings and chapter review. However, several essential elements of the Plan were developed by the plan development consultants out of the public view and without any review, input or vote from the CBGSA or the Standing Advisory Committee. These sections were first presented to the SBGSA, the SAC in the text of the Draft CBGSA. These include: Setting a 30% Threshold for all five Undesirable Results in the Basin, without scientific evidence or justification Setting all Interim Milestones for Groundwater Levels to be identical with all Minimum Thresholds. Setting Minimum Thresholds for: Groundwater Quality Subsidence Interconnected surface water Setting a Sustainability Goal for the Cuyama Basin and pre-existing Undesirable Results. This approach is unacceptable and runs counter to the claim that the process encouraged "input, discussion, and questions from both the CBGSA Board of Directors and SAC members as well as public audience members (Draft CBGSP, Chapter One, P. 58, 1.3.5). On what are arguably the most important elements of the Plan, no "input, discussion, and questions" were encourage or elicited from the CBGSA, the SAC or the public. Recommendation: These critical sections require further review by the CBGSA, the SAC and the public.	All of these issues have either been discussed in CBGSA Board meetings or included in draft Chapters that were previously reviewed and commented on.
122	Lynn Carlisle	Cuyama Valley Family Resource Center		General			The process that the CBGSA undertook to apply for a DWR Technical Support Services grant to fund the drilling of three much-needed new monitoring wells was discontinued halfway through the process, without notification to the CBGSA, the Standing Advisory Committee or the public. Apparently the initial grant application was submitted, the second portion of the grant application process was not completed and funding three essential wells to expand the Cuyama Basin's monitoring network and fill critical data gaps was not successfully secured. No public statement or explanation has been issued regarding this decision, with all decisions made behind closed doors.	Comment noted.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Executive Summary
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
1	Matt Young	SBCWA					This section is the most likely to be read by stakeholders and interested members of the public, and contains confusing wording and organization. It could use a thorough read-through by an editor for clarity.	Comment noted. It has been reviewed by a technical editor
2	Matt Young	SBCWA	P. ES-2				The basin setting map does not show most of the features described in the Basin Setting section, and does not have a legend for the various color GW basins. The name of the basin in the map (Cuyama Valley) is different than the name of the basin used in the document (Cuyama). Recommend revising.	The figure has been replaced
3	Matt Young	SBCWA	P. ES-3				The Existing Groundwater Conditions section of the ES should focus on more groundwater levels rather than water quality, as water quality is not the primary issue in the basin. The summary should discuss the various regions within the basin, rather than getting into the specific concentrations of water quality constituents. Also, Figure ES-4 is not illustrative of existing conditions in the basin and doesn't belong in the ES; a set of representative hydrographs may be more useful.	The section has been revised
4	Matt Young	SBCWA	P. ES-4	1	Final		Please revise the description of water quality as "not good". Possibilities include "poor", "degraded", or "impaired". Also, suggest splitting the sentence up for clarity.	The text has been revised
5	Matt Young	SBCWA	P. ES-4	Last			"The lowering of groundwater levels has corresponded with degradation of groundwater quality, and particularly levels of TDS." Add the word "elevated" or "increased" before TDS.	The text has been revised
6	Matt Young	SBCWA	P. ES-4	Last			Also, suggest removing the editorial word "minor" from the second sentence. The specific amount of measures subsidence could be stated to make the sentence more clear.	The text has been revised
7	Matt Young	SBCWA	P. ES-7	3			"Since there are no projected changes in land use or population in the Basin, the projected annual decline in groundwater storage is estimated to be the same as under current conditions." Please revise to "Assuming no changes in land use or population in the Basin, the projected annual decline in groundwater storage is estimated to be the same as under current conditions."	The text has been revised
8	Matt Young	SBCWA	P. ES-7				Suggest moving the description of the modeling in the second to last paragraph further up in this section for clarity.	The text has been revised
9	Matt Young	SBCWA	P. ES-7	Last			Suggest changing "annual water budget of minus 25,000 acre-feet..." to "overdraft of 25,000 acre-feet".	The text has been revised
10	Matt Young	SBCWA	P. ES-9				The "summary of existing wells" table should be removed from the ES. It is not relevant to the plan going forward, and the numbers in it are misleading without explanation. The description of existing monitoring is also not particularly useful in the ES. Suggest replacing with a description of the proposed monitoring plan (number of wells, frequency of monitoring, etc.).	The table has been changed.
11	Matt Young	SBCWA	P. ES-11				Please edit the first paragraph for clarity. "Projects that increase water supply" are management actions, not some separate category.	The terminology used in the ES is consistent with Chapter 7
12	Matt Young	SBCWA	P. ES-11				There are three separate places where it is stated that the reductions will be reevaluated.	The current version of the ES only states this once.
13	Joe Haslett						TDS Section - This section needs to be rewritten for clarity and appropriate descriptions. This states that there is a California water quality standard the is exceeded but does not say for what? Drinking water? Most water is used for agriculture this comparison does not have merit. Overall using the TDS measurements and stating that there 'high' levels only has meaning if it is in relationship to a use of the water, without showing a use it is has no meaning and is ambiguous. Since TDS in any particular situation can not be fixed' why is this being used? How will it be defined as an Undesirable outcome?	Comment noted. The text has been revised to note that the MCL is for drinking water
14	Joe Haslett						Groundwater Graph is misleading, it seems to represent the Entire CBGSA area, but is really just for the central area.	The graph is showing data for the entire Basin (consistent with the scale of data reporting in Chapter 2). It is noted in the text that the central basin contains most of the overdraft in the Basin.
15	Joe Haslett						The subsidence statement needs clarification, this seems like speculation, do you know why this occurred and do you know if it has contributed in any way to any other 'undesirable' situations, this is stated as reality, also, the actual measurement is insignificant and could have occurred simply because the school put too much water on the ground and caused the soil to settle, ground squirrels, gophers...	The sentence has been revised
16	Joe Haslett			Last paragraph			Water Budget: Move last paragraph to the opening paragraph/statements, Add "Central Part" to all references to "Basin". This is written as if the entire CBGSA is in in crisis, very misleading.	The data reported is for the entire basin, not just for the central basin. This is consistent with the scale of data reporting in Chapter 2. The regional differences are noted in the last paragraph.
17	Joe Haslett						Projects and Management Actions: Should state Central Area Basin or in Proposed Central Area Basin	The text notes that projects will be in the Central Basin where appropriate
18	Joe Haslett						Funding: Statement that the funding will be borne by the Landowners is an assumption that needs to be clarified, nothing has been established or determined.	The sentence has been revised
19	Neil Currie	Cleath Harris	ES-3	Final			The San Emigdio Mountains lie along the eastern edge of the basin, the Calient Range lies along the northern edge (maybe northeastern edge), this is unclear	The figure has been replaced
20	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	ES-1			Although current analysis indicates groundwater pumping ...	Acknowledges additional data and review of model are needed. What are the "additional efforts to confirm the level of pumping reduction required to achieve sustainability"... "as outlined"? What section & page?	This is noted in the Water Budget section of Chapter 2
21	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	ES-2 Figure ES-3				Fig. ES-3 could use an inset map to show location in California	The figure has been replaced
22	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	ES-4			Figure ES-5 is a graph showing ...	Suggest "...showing modeled annual and cumulative long-term reduction..."	The text has been revised
23	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	ES-6				Summarize how "5-year drought buffer" was calculated or estimated	The sentence has been revised
24	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	ES-7			Analysis of the Basin as a whole shows that much...	The basin must be considered as a whole. The Central basin is downgradient of other areas of the basin. Groundwater flow from the western and southeastern areas into the Central basin is being intercepted, cutting off water that historically has helped to reduce drawdown effects of pumping in the Central basin.	Comment noted. While the ES mostly discusses conditions over the entire Basin, it is still appropriate to discuss regional differences.
25	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	ES-11			The exact amount of required...	Acknowledges the effects of uncertainty in predicted overdraft, but suggest a more explicit discussion of uncertainty.	Comment noted. Uncertainty discussion has been added to Chapter 2. The ES text notes that the amount of pumping reductions may be revised as additional evaluations are performed in the future.
26	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	ES-13 Fig. ES-14				Add small well location symbols to the Management Area figure, so the reader can get an idea of the spatial basis of projected drawdown contours. Since no pumping reductions are required outside of the drawdown-defined Mgmt Areas, whether a well is in or out is a big deal for landowners in terms of their costs. Consider classifying wells as in or out within the OPTI system.	The OPTI well database contains monitoring wells, not production wells. Location data on many production wells is not available and therefore it would be misleading to put them on the map.
27	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	ES-15 Fig. ES-16				Suggest enlarging Fig. ES-16 for readability.	The text has been enlarged
28	Brenton Kelly	Quail Springs Permaculture	General			Interim Milestone?	Question: What happened to Interim Milestones?	Interim Milestones are shown in Chapter 5 (and adjusted per Board direction), but are not needed in the ES

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Executive Summary
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
29	Brenton Kelly	Quail Springs Permaculture	P. ES.3			Groundwater quality in the Basin is variable...	Comment: This Groundwater Quality section makes all the valid points for the need to monitor more than just TDS, and then it fails to mention that the Plan will only monitor TDS.	The text has been revised to be consistent with Board direction
30	Brenton Kelly	Quail Springs Permaculture	P. ES.6 & P. ES.9			these representative wells and subsidence...	Comment: The text fails to mention that the Monitoring Network has significant Data Gaps. No Stream Gauges or Piezometers, only one Subsidence meter in the center, no Fault characterization. Addition: Mention Data Gaps, even if only just a little. How will this GSP measure for subsidence in the center of the cone of depression? How will this GSP evaluate stream flow/groundwater interactions? How will this GSP know if pumping is causing Arsenic or Boron laden waters to migrate into the cone of depression?	The text has been revised to note that there are data gaps in the monitoring network
31	Brenton Kelly	Quail Springs Permaculture	P. ES.6			In general, measurable objectives were established...	Question: If there is no planed intention or Interim Milestones toward the Measurable Objective, how can they serve as a drought buffer? What part of this GSP aims to achieve the MO? Comment: It would be pure luck or maybe a freak coincidence to ever get back up to the Measurable Objective. The Sustainability Goal is simply to not exceed the Minimum Thresholds, which will be a big lift as it is.	Interim Milestones are shown in Chapter 5 (and adjusted per Board direction), but are not needed in the ES
32	Brenton Kelly	Quail Springs Permaculture	P. ES.13 Figure ES-14			the yellow, orange and red areas indicating areas ...	Correction: The red areas actually indicate groundwater elevation declines in excess of 7 feet of per year, not just 4. Without a legend on Fig. ES.14 this text is inaccurate and an underrepresentation of the significance of the problem areas.	The text has been revised
33	Lynn Carlisle	Cuyama Valley Family Resource Center		P. 2, 3rd paragraph		The Draft GSP outlines...	Addition of the clarification word "basinwide": Although current analysis indicates groundwater pumping reductions on the order of 50 to 67 percent basinwide may be required to achieve sustainability, additional efforts are required to confirm the level of pumping reduction required to achieve	This has been added.
34	Lynn Carlisle	Cuyama Valley Family Resource Center		P. 2, 3rd paragraph		The Draft GSP outlines...	Comment: The "additional efforts ... required to confirm level of pumping..." referred to in this sentence should include the approximately 30% of wells in the valley that have not been identified or from which data has been collected. Source, Draft CBGSP, Chapter One, P. 13, 1.2.2	Comment noted. This can be considered in GSP implementation, but this level of detail is not needed in the ES
35	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 4	Existing groundwater conditions			Question: What is the source of the detailed water quality information, specifically the levels of constituents?	This is in the Groundwater Conditions section of Chapter 2
36	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 8	Water budgets, 1st paragraph			Addition: To clarify the Basin's condition historically, this sentence should be amended (with text in red) to read: "The Basin has been in an overdraft condition for many years. Overdraft conditions in the Basin were first documented in the 1950s, and the DWR has identified the Basin to be in "critical overdraft" since 1980.	It is noted in the first paragraph of the ES that the basin is in critical overdraft
37	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 8	Water budgets, 3rd & 4th paragraphs			Addition: Please include a clear explanation of sustainable yield, a critical element of the CBGSP, in this section. While explained in Chapter Two, the Sustainable Yield belongs in the Executive Summary as well to illuminate the extent of the overdraft and the task ahead to reach sustainability.	The Basin sustainable yield is shown in Figure ES-8
38	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 10	Monitoring Network, Summary of Existing Monitoring Wells			Question/Comment: This table is confusing. The Executive Summary indicates on P. 7 that that there are 61 representative wells. Yet this table (titled Summary of Existing Monitoring Wells) seems to indicate that there are 222 existing monitoring wells (222 Total number of DWR and CASGEM wells). Please clarify.	The table has been replaced
39	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 13	Last Paragraph			Question/Comment: This paragraph refers to the very misleading inclusion of GSA projects that "these include installing new wells to secure reliability of water supply to residents of Ventucopa, Cuyama and New Cuyama." What is the GSA's role in these projects? P. 12 of the Executive Summary, states that funding for three new community wells is the responsibility of the communities. In Chapter 8, (P. 6, 1.1, Fig 8-1), states that oversight, permitting, installation and operation of the wells is the responsibility of the communities. So if funding, installation and operation of these wells is the responsibility of the communities, why are they included in the GSP at all? They do not appear to be projects of the CBGSP. Please clarify.	Financing options for these projects are included in Chapter 8. Financing does not need to be provided directly by the GSA for the projects to be included in the GSP.
40	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 15	3rd bullet point			Change: Basn is misspelled	This has been fixed.
41	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 16	Figure ES-16			Change: In the footnote to the overall schedule of activities ("Represents Management Area Activities), please text to read: "Represents Activities that will take place in any currently identified management area, or area that may be identified in the future."	The footnote text has been revised
42	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 17	1st paragraph		For budgetary purposes, the ...	Correction: Chapter 8 (P. 9, last paragraph) notes this figure as \$1.3 million per year.	This has been corrected.
43	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 17	General			Addition: As an Executive Summary document that will be more widely read than the full CBGSP, it seems prudent to include a brief summary of the consequences of not implementing this plan, and thereby not achieving sustainability.	While SGMA and the GSP regulations provide general information on what would happen if the GSP fails, there are many uncertainties regarding that outcome. Therefore, it would not be helpful to include this in the GSP document, but this topic can be discussed in future GSA meetings
44	Cathy Martin	SLO County	ES-2 Public Meeting Figure			"Public Meeting" table	reference table in text + table caption, such Table ES-1 Number of Public Meetings	A reference has been added to the text
45	Cathy Martin	SLO County	ES-2			The strategy incorporated monthly CBGSA...	Discuss table in text, such Table ES-1 Number of Public Meetings shows the number of...	A reference has been added to the text
46	Cathy Martin	SLO County	ES-3			The United States Geologocal	spelling - Geological	This has been fixed.
47	Cathy Martin	SLO County	ES-3			Concentrations of boron at up to...	Consider adding the secondary MCLs for chloride and boron	References to these constituents have been removed as they are not discussed in detail in the main document.
48	Cathy Martin	SLO County	ES-3			Consider adding the range of years instead of many years.	Consider adding the range of years instead of many years.	The sentence following this one notes that overdraft conditions have been documented since the 1950's
49	Cathy Martin	SLO County	ES-3			These values exceed the California...	The statement needs clarification, please add the secondary MCL and define what a secondary MCL is. For example, secondary MCLs address aesthetic issues related to taste, odor, or appearance of the water and are not related to health effects, although elevated TDS concentrations in water can damage crops, affect plant growth, and damage municipal and industrial equipment.	The sentence has been revised to note that this is the secondary MCL.
50	Cathy Martin	SLO County	ES-7			The Basin has been in overdraft...	Consider deleting this sentence since already mentioned earlier in report	The sentence has been removed.
51	Cathy Martin	SLO County	ES-9			Figure ES-9: Groundwater	Consider removing the bullet point and increasing the figure size to read the legend	The figure has been enlarged.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Executive Summary
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
52	Cathy Martin	SLO County	ES-14			In 2023, monitoring in 2023...	Consider deleting "in 2023" (repeated)	This has been corrected.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 1
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "..."	Comment	Response to Comment
1	Jane Wooster		1.2.4		2	"Local agencies such as the CCSD and"	CCSD does in fact test groundwater quality every six months and has for years according to employees and contractors involved.	The sentence has been removed
2	Jane Wooster		1.3.1		2nd bullet		Here you say CCSD does monitor and report groundwater elevations	The sentence in 1.2.4 has been removed
3	Jane Wooster		1.3.4			"The CBGSA Board appointed the"	Look at language RE: SAC. Not true. Delete "primary." During discussions there was never any intent that the SAC would be the "primary" body for providing advice. The GSA is equally interested in comments from the public no matter in what venue the comments are received. Advice and input primarily comes from Woodard & Curran.	The text has been revised
4	Joe Haslett		1.3.1				Benefits - Beneficial Users: The first statement is very broad. There has not been anything that describes the benefits to water users in the areas that are Not in the problem area of the Central Area, assuming that the area can be remedied, this has No benefit to any other area, especially the Western and North Western areas where the water comes from the water shed in the mountains to the south and Not from the water shed from the East (as per your presentations and data)	This section is intended to describe beneficial users of groundwater in the Basin, not just those that benefit from the GSP projects and actions.
5	Brenton Kelly	Quail Springs Permaculture	P. 1.1 Sec. 1.1			Introduction and Agency Information: List of GSA members	Addition: Alternate Members and Affiliations should also be listed here.	These have been added
6	Brenton Kelly	Quail Springs Permaculture	P. 1.2 Sec. 1.1.2			Management Structure: SAC members	Addition: As designated by the GSA, the SAC is a 9-member committee and a vacancy will hopefully be filled soon.	The text has been revised to note that the 9th SAC position is currently vacant.
7	Brenton Kelly	Quail Springs Permaculture	P. 1.7 Sec. 1.2.2			Plan Area Setting: "However, some wells may not have been reported to DWR ..."	Question: How does the GSP plan to account for the 30% of total wells that were not reported to the DWR? Addition: These well should be investigated and considered for inclusion in the Monitoring Network as Representative wells.	This will be considered during GSP implementation.
8	Brenton Kelly	Quail Springs Permaculture	P. 1.21 & 1.22 Figure 1-15 & Figure 1-16			Production Well Density & Domestic Well Density	Addition: These wells should be characterized as De minimis, domestic, industrial, rangeland or irrigation users and must also be identified and incorporated in density mapping. Question: How does this GSP define "de minimus"? Source: Final GSP Emergency Regulations, Section 354.8(a) " (5) The density of wells per square mile, by dasymetric or similar mapping techniques, showing the general distribution of agricultural, industrial, and domestic water supply wells in the basin, including de minimis extractors, and the location and extent of communities dependent upon groundwater, utilizing data provided by the Department, as specified in Section 353.2, or the best available information."	These figures depict data from DWR's Well Completion Report database, which is currently the best available information. This could be potentially updated during GSP implementation.
9	Brenton Kelly	Quail Springs Permaculture	P. 1.26 Sec. 1.2.3 Table 1.1			Deactivated stream gages	Addition: Please provide a discussion of the challenge to long term monitoring of stream flow. How critical is this data gap. Suggestion: Install flow gauge on all bridges over the Cuyama River (only 3) and major drainages, ASAP.	Text has been added.
10	Brenton Kelly	Quail Springs Permaculture	P. 1.45 Sec. 1.3.1			Holders of overlying groundwater rights, including agricultural users ...	Question: Are there industrial users and industrial wells in the Cuyama Basin? Should they be identified here and in the DMS as such?	Industrial users are not included in the GSP because they do not have a net consumption of water.
11	Brenton Kelly	Quail Springs Permaculture	P. 1.45 Sec. 1.3.1			Disadvantaged communities: There are two disadvantaged communities ...	Correction: The communities of New Cuyama and Ventucopa have been designated as Disadvantaged Communities; the community of Cuyama has been designated as a Severely Disadvantaged Community. Source: https://gis.water.ca.gov/app/dacs/	The text has been revised to add Ventucopa
12	Brenton Kelly	Quail Springs Permaculture	P. 1.45 Sec. 1.3.1			Potential interests that are not present in the Cuyama Basin...	Question: What is the definition of an "Environmental User of Groundwater"? Would this include GDEs? Would this include Wildlife habitat and its connectivity? Would this include the beneficial uses such as fishing, birding, swimming and living, all of which depend on groundwater?	Environmental users have been added to the list of users present in the Basin
13	Brenton Kelly	Quail Springs Permaculture	P. 1.50 Sec. 1.3.4			On June 30, 2017, the CBGSA Board ...	Addition: Please describe the proportional hybrid weighted voting by CBGSA members, including the criteria requiring a supermajority, as stipulated by the Joint Powers Agreement which governs the CBGSA's authorities.	This has been added
14	Brenton Kelly	Quail Springs Permaculture	P. 56 Sec. 1.3.4			In March 2018, the CBGSA Board expanded the SAC membership ...	Comment: The inclusion and active participation of the Hispanic community in the development and implementation of this GSP is critical. Action: Appoint and maintain a full 9 seat SAC with at least 2 Hispanic members	The text in section 1.1.2 has been revised to note that the 9th SAC position is currently vacant.
15	Brenton Kelly	Quail Springs Permaculture	P. 1.51 Sec. 1.3.5			Community input was encouraged ...	Comment: Community input was extremely limited at all CBGSA meetings. Time constraints and the need to "keep moving on" were often used to discourage community input at the public GSA meetings.	Comment noted. The text has been revised.
16	Brenton Kelly	Quail Springs Permaculture	P. 1.52 Sec. 1.3.5			The input was also used to develop context and content for CBGSA meetings...	Change: The word, "contend" should be "content"	The text has been revised.
17	Brenton Kelly	Quail Springs Permaculture	P. 1.53 Sec. 1.3.5			The GSP's list of projects was revised ...	Correction: The GSP only offers encouragement in support for, but not construction of any new wells. This appears responsive to the disadvantaged community public comment & real needs while doing and committing to nothing. This GSP only proposes to support the idea of grant funding to construct new wells.	Comment noted. No change needed as the sentence is accurate in that these projects are included in the GSP project list in Chapter 7.
18	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 5			Acronyms list	Addition: GDE Groundwater Dependent Ecosystems SAC Standing Advisory Committee SBCWA Santa Barbara County Water Agency	These have been added.
19	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 7			1.1 Introduction and Agency Information: List of GSA members	Addition: As alternates frequently attend meetings, they (and their affiliations) should also be listed here.	These have been added.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 1
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
20	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 7			1.1 Introduction and Agency Information	Addition: Section 354.6 of the Final GSP Emergency Regulations includes the following requirement: "(e) An estimate of the cost of implementing the Plan and a general description of how the Agency plans to meet those costs." This item is not included in the Appendix A Checklist, nor is it outlined in Chapter 1, Section 1.1. Question: Will the CBGSP be considered incomplete without this information? Should the Draft CBGSP have included a placeholder notation here? Source: Final GSP Emergency Regulations	This is discussed in Chapter 8
21	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 8			1.1.2 Management Structure: SAC members	Addition: Please include the existence of one vacant seat in the 9-member committee.	The text has been revised to note that the 9th SAC position is currently vacant.
22	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 9			Information presented in Figures 1-15...	Question: How does the CBGSP plan to account for the 30% of total wells that were not reported to the DWR?	These figures depict data from DWR's Well Completion Report database, which is currently the best available information. This could be potentially updated during GSP implementation.
23	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 27 & 28			Figure 1-15: Production Well Density Figure 1-16: Domestic Well Density	Addition: De minimis users must also be identified and incorporated in density mapping. How does the CBGSP define "de minimis" user? Is it consistent with the State Water Board's definition? The State Water Board Fact Sheet issued in March 2017 "De minimis Extractors: SGMA defines a de minimis extractor as "a person who extracts, for domestic purposes, two-acre feet or less per year." A person who extracts two acre-feet or less per year for a non-domestic purpose is not considered a de minimis extractor. Domestic purposes do not include commercial activities. A person who extracts more than two acre-feet per year from a parcel is not a de minimis user. De minimis users are exempt from reporting in unmanaged areas. However, the State Water Board may require de minimis extractors to report in a probationary basin if necessary. The emergency regulation clarifies how the term "domestic purposes" will be interpreted when determining if an extractor is de minimis. The Final GSP Emergency Regulations, Section 354.8(a) indicate that the CBGSA must show "(5) The density of wells per square mile, by dasymetric or similar mapping techniques, showing the general distribution of agricultural, industrial, and domestic water supply wells in the basin, including de minimis extractors, and the location and extent of communities dependent upon groundwater, utilizing data provided by the Department, as specified in Section 353.2, or the best available information."	These figures depict data from DWR's Well Completion Report database, which is currently the best available information. De minimis users could be potentially be identified and included during GSP implementation.
24	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 32, 1.2.3			Deactivated stream gages	Addition: Response to public comment #19 (P. 167) requesting explanation of the deactivation of 4 stream gages, was "The text will be modified to discuss the deactivated USGS gages." No discussion appears in the Draft CBGSA. Please provide discussion of the deactivated USGS gages.	Information on these gages is provided in Table 1-1
25	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 50, 1.2.7			Element (1) (i) Efficient water management practices, as defined in Section 10902, for the delivery of water and water conservation methods to improve the efficiency of water use.	Change: Location: Cuyama Basin Irrigation District. Does this exist? Was this supposed to be the Cuyama Basin Water District? And if so, please explain the CBWD's role in " Efficient water management practices, as defined in Section 10902, for the delivery of water and water conservation methods to improve the efficiency of water use."	It was been corrected to say Cuyama Basin Water District. As the representative of many landowners in the Basin, it is expected that the CBWD would play a role in implementation of potential water conservation measures.
26	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 51, 1.3.1			Beneficial Users and Users of Groundwater	Question: Are there industrial users and industrial wells in the Cuyama Basin and have those been included in the Draft CBGSP?	Industrial users are not included in the GSP because they do not have a net consumption of water.
27	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 51, 1.3.1			Disadvantaged communities: There are two disadvantaged communities in ...	Correction: The communities of New Cuyama and Ventucopa have been designated as Disadvantaged Communities; the community of Cuyama has been designated as a Severely Disadvantaged Community. Source: https://gis.water.ca.gov/app/dacs/	The text has been revised to add Ventucopa
28	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 56, 1.3.4			GSA Decision Making Process	Addition: Please add a discussion of the proportional voting by CBGSA members, including the criteria by which specific votes require a supermajority, as stipulated by the Joint Powers Agreement which governs the CBGSA's authorities.	This has been added
29	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 56, 1.3.4			In March 2018, the CBGSA Board expanded ...	Comment: This change was made at the insistence of the public and at the unanimous request of the full Standing Advisory Committee, due the lack of representation of the Hispanic community, as required by the Final GSP Emergency Regulations. Since the resignation of one Hispanic SAC member in December 2018, the CBGSA has delayed replacing that committee member for five months, a critical omission during the final phase of development of the GSP. Reasons have included cost and timing. CBGSA staff quoted an estimate of \$913 to initiate and complete the process of selecting a replacement. It can be accurately stated that the 11-member SBGSA and the original 7- member SAC, had no Hispanic representation at all. In the 23 months that the GSP has been in formal development, during 10 of those months, 2 members of the Hispanic community were included on the SAC, during 5 of those months 1 member of the Hispanic community has been included. In a community that is roughly 50% Hispanic, this cannot be even remotely considered to be appropriately representative of the demographics of the community. Section 354.10 (d)(3)of the Final GSP Emergency Regulations states that the GSP must provide "A description of how the Agency encourages the active involvement of diverse social, cultural and economic elements of the population within the basin." Aside from translation of meeting announcements, newsletters, and the Draft GSP Executive Summary into Spanish, and holding workshops in Spanish, the community engagement process has not actively engaged with the Hispanic or the disadvantaged community. In fact, for all SBGSA and SAC meetings, unpaid volunteer interpreters have provided live interpretation, utilizing equipment on loan from the local school district.	Comment noted. Actions taken to outreach to the Spanish community are described in Sections 1.3.6 and 1.3.7
30	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 57, 1.3.5			Community input was encouraged and received ...	Comment: Community input was extremely limited at all CBGSA meetings. The Board Chair and Vice Chair were extremely brusque with the public on multiple occasions and did not permit public comment, even when the public used the required comment process. On multiple occasions, requests for comment were rejected citing time restrictions, claimed irrelevancy, or that the process was "moving on". On several occasions, one comment or question may have been permitted from members of the public, but follow-up questions or comments were not permitted. Additionally, following the established board procedure, with public comment following board discussion, even after subsequent additional board discussion, with additional issues raised, public comment was not permitted on the additional issues raised. Further, on at least one occasion, the Board Chair and Vice Chair permitted a SBGSA Director to speak harshly to staff and a member of the public. This conduct is not consistent with the claim "Community input was encouraged and received at all CBGSA meetings."	Comment noted. The text has been revised.
31	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 58, 1.3.5			How Public Comment Was Used....	Change: 1st paragraph, "contend" should be "content"	The text has been revised.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 1
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
32	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 58, 1.3.5			All CBGSA-hosted public meetings...	Comment: This statement is a misrepresentation of the actual circumstances. See Comments #13 & 14 above. Additionally, the public was NOT encouraged to provide input or discussion at CBGSA meetings. The public was permitted to ask one question, perhaps two, but NO discussion was permitted. However, at meetings of the Standing Advisory Committee and at Public Workshops, the public was encouraged to provide input, engage in discussion and ask questions.	Comment noted. The text has been revised.
33	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 59, 1.3.5			The GSP's list of projects was revised to include	Correction: "The GSP's list of projects was revised to include support for construction of new wells for these communities." The GSP did not propose to construct or finance the construction of these wells. It proposes to help seek grant funding to construct new wells.	Comment noted. No change needed as the sentence is accurate that these projects are included in the GSP project list in Chapter 7.
34	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 135			The SAC will determine the financial component...	Change: Should the highlighted text (SAC) read "GSA"?	The text has been revised.
35	Erinn Wilson	California Department of Fish and Wildlife Region 5	1.3.1				Department believes that beneficial uses, such as fish and wildlife preservation and enhancement, GDEs and other plant and animal species that depend on interconnected surface waters occur within the Cuyama Basin [Water Code §10727.4(l), Title 23 California Code of Regulations §§ 666 and 354.26(b)(3)]. GDEs can rely on groundwater for some or all its requirements, relying on multiple water sources simultaneously and at different temporal/spatial scales (e.g., precipitation, river water, reservoir water, soil moisture in the vadose zone, groundwater, applied water, treated wastewater effluent, urban stormwater, irrigated return flow). Several sensitive species known to occur within the Basin that should be considered in the GSP as beneficial users and are vulnerable to groundwater pumping impacts include (but not limited to): California red-legged frog (<i>Rana draytonii</i>); tricolored blackbird (<i>Agelaius tricolor</i>); western spadefoot (<i>Spea hammondi</i>), southwestern pond turtle; (<i>Actinemys pallida</i>); yellow warbler (<i>Setophaga petechia</i>); Arroyo chub <i>Gila orcuttii</i>); least Bell's vireo (<i>Vireo bellii</i> pUSIIIus); and willow flycatcher (<i>Empidonax traillii</i>) [see Natural Communities Commonly Associated with Groundwater dataset (NC Dataset) located at https://gis.water.ca.gov/app/NCDataSetViewer/].	Environmental users have been added to the list of users present in the Basin
36	Cathy Martin	SLO County				Prep. Checklist - Article 5 - 354.4 "List of references and..."	References are not in the executive summary, but listed in each chapter	The table has been revised
37	Cathy Martin	SLO County				Prep. Checklist - Article 5 - 354.6 "Estimate of implementation..."	Consider adding Chapter 8, which list the estimated cost.	The table has been revised
38	Cathy Martin	SLO County				Description of how those plans may limit....	Please check to see if this is mentioned in Chapter 4 (maybe Chapter 5).	The table has been revised
39	Cathy Martin	SLO County				Summary of the process for...	Please verify that it is in Chapter 1.	A sentence has been added to Chapter 1 regarding the permitting process for new wells.
40	Cathy Martin	SLO County				Prep. Checklist - Article 5 - 354.8(g)	Please verify that all of these items are in Chapter 8. It seems that some of these items are briefly mentioned in Chapter 1.	The table has been revised
41	Cathy Martin	SLO County				Prep. Checklist - Article 5 - 354.10	Please verify that the items are in Chapter 8. It seems that some of these items are briefly mentioned in Chapter 1.	The table has been revised
42	Cathy Martin	SLO County				Prep. Checklist - Article 5 - 10727.2(d)(4)	Please verify, some of these items are in Ch 2.1 (reference to Ch 7 in 2.3)	The table has been revised
43	Cathy Martin	SLO County				Prep. Checklist - Article 5 - 354.20	Please check to see if a few of these items are discussed in Chapter 7	The table has been revised
44	Cathy Martin	SLO County	1.1.3			Per Section 10723.8(a) of the	Consider adding to whom the notice was given to.	This has been added
45	Cathy Martin	SLO County	1.2.1			Consider defining water yielding capacity	Consider defining water yielding capacity	Don't need to provide a definition since this is a direct quote from a DWR document
46	Cathy Martin	SLO County	1.2.4			Consider defining temporal frequencies	Consider defining temporal frequencies	A definition is not needed for this
47	Sandi Matsumoto	The Nature Conservancy	P. 1-45 & 1-46				[Checklist item #1]: Significant science-based sources indicate that environmental users of groundwater, known as groundwater dependent ecosystems (GDEs), as well as other species that depend on interconnected surface waters, exist in Cuyama Basin and therefore should be identified and described. For any species that are no longer present in the basin, please provide scientific rationale and data to support this claim. The information on environmental users in the Cuyama basin is readily available and includes the data and data sources. Please refer to the following: <ul style="list-style-type: none"> • Natural Communities Commonly Associated with Groundwater dataset (NC Dataset), which is provided by the Department of Water Resources and identifies potential GDEs https://gis.water.ca.gov/app/NCDataSetViewer/ • In Fall 2018, The Nature Conservancy sent a list of freshwater species located in the Cuyama Basin, which is included as Attachment C of this letter. Please take particular note of the species with protected status. • In addition to identifying and describing environmental beneficial users, SGMA requires that beneficial users be considered throughout the plan. The Nature Conservancy has identified each part of the GSP with this requirement. That list is available here: https://groundwaterresourcehub.org/importance-of-gdes/provisions-related-to-groundwater-dependent-ecosystems-in-the-groundwater-s. Please ensure that environmental beneficial users are addressed accordingly throughout the plan. 	Comment noted. Environmental users have been added to the list of users present in the Basin
48	Brenton Kelly	Quail Springs Permaculture	P. 1.57 Appendix A GSP Regulations			Missing or only selected items	Question: Why do many items in this Appendix differ with GSP Regulations list? Some are edited, or omitted? Consistency here with the regulations seems critical. Source: Final GSP Emergency Regulations	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 1
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
49	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 65, Appendix A GSP Regulations Section 352.2			Monitoring protocols that are designed to detect changes ...	Question: Where does highlighted text ("and flow and quality of surface water that directly affect groundwater levels or quality or are caused by groundwater extraction in the basin") appear in the Final GSP Emergency regulations section 352.2? This highlighted text is not included in the regulations. Please provide the source for the highlighted text. 352.2 states: "Each Plan shall include monitoring protocols adopted by the Agency for data collection and management, as follows: Monitoring protocols shall be developed according to best management practices. The Agency may rely on monitoring protocols included as part of the best management practices developed by the Department, or may adopt similar monitoring protocols that will yield comparable data. Monitoring protocols shall be reviewed at least every five years as part of the periodic evaluation of the Plan, and modified as necessary. Note: Authority cited: Section 10733.2, Water Code. Reference: Sections 10727.2, 10728.2, 10729, and 10733.2, Water Code.	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.
50	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 65, Appendix A GSP Regulations Section 352.2			Missing text	Addition: Please include: (c) Monitoring protocols shall be reviewed at least every five years as part of the periodic evaluation of the Plan, and modified as necessary. Source: Final GSP Emergency Regulations	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.
51	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 65, Appendix A GSP Regulations Section 352.4			Missing text	Addition: Please include: 352.4. Data and Reporting Standards This section provides significant guidance on what must be included in the GSP and wholly missing from this appendix. Source: Final GSP Emergency Regulations	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.
52	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 65, Appendix A GSP Regulations Section 354.6			Estimate of implementation costs Chapter 1 Section 1.1 Introduction and Agency Information	Addition: Section 354.6 includes the following requirement: "(e) An estimate of the cost of implementing the Plan and a general description of how the Agency plans to meet those costs." This item is not included in the Appendix A Checklist, nor is it outlined in Chapter 1, Section 1.1. Will the plan be considered incomplete without this information? Should the Draft GSP have included a placeholder notation here? Source: Final GSP Emergency Regulations	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.
53	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 65, Appendix A GSP Regulations Section 354.8(a)			Bullet point #4: Existing land use designations	Should read: "Existing land use designations and the identification of water use sector and water source type." Source: Final GSP Emergency Regulations 354.8(a)(4)	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.
54	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 65, Appendix A GSP Regulations Section 354.8(a)			Bullet point # 5 "Density of wells per square mile...."	Add: "including de minimis extractors"	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.
55	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 67, Appendix A GSP Regulations Section 354.8(g) Water Code Section 10727.4			Bullet point #2: Wellhead protection	Should read: Wellhead protection areas <i>and recharge areas</i> . Source: CA Water Code §10727.4 (2017)	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.
56	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 67, Appendix A GSP Regulations Section 354.10			Bullet point #6 Encouraging active involvement	Should read: (d)(3): A description of how the Agency encourages the active involvement of diverse social, cultural, and economic elements of the population within the basin Source: Final GSP Emergency Regulations	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.
57	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 68, Appendix A GSP Regulations Section 354.14			Missing or only selected items	Change: Many items in the Final GSP Emergency Regulations Section 354.14 are missing from Appendix A. Please revise to include all items. Source: Final GSP Emergency Regulations	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.
58	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 71, Appendix A GSP Regulations Section 354.30			Bullet #3 "Description of a reasonable path to achieve and maintain the sustainability goal, including a description of interim milestones"	This is incomplete. Please include a more complete description of measurable objectives and interim milestones. 354.30 (a) Each Agency shall establish measurable objectives, including interim milestones in increments of five years, to achieve the sustainability goal for the basin within 20 years of Plan implementation and to continue to sustainably manage the groundwater basin over the planning and implementation horizon. 354.30 (e) Each Plan shall describe a reasonable path to achieve the sustainability goal for the basin within 20 years of Plan implementation, including a description of interim milestones for each relevant sustainability indicator, using the same metric as the measurable objective, in increments of five years. The description shall explain how the Plan is likely to maintain sustainable groundwater management over the planning and implementation horizon. Source: Final GSP Emergency Regulations	The Table in the appendix is based on the Preparation Checklist provided by DWR. The only change is the addition of the column noting the relevant GSP Section for each row. Additional detail on the requirements is not needed.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 2
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
1	Meg Brown						Groundwater dependent ecosystems: The Plan has a gap concerning GDEs in the Basin that should be addressed in terms of impact and actions under the Plan.	Comment noted. Actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.
2	Matt Young	SBCWA					This chapter would be a good place to introduce and make the case for the threshold regions and present conditions by region. Also, the groundwater level decline figures presented in Chapter 7 would be helpfully introduced here. The executive summary cites a water budget for the Central Management area of 25,000 acre-feet per year of overdraft, but that is not in this section at all. Overall, this chapter needs to be better tied in with the rest of the document.	Per expressed desire by the CBGSA Board, water budget numbers are only shown for the complete Basin, not for sub-regions. The reference to the Central Basin overdraft in the Executive Summary has been removed.
3	Jane Wooster		P. 2-38, Figure 2-10				Where are these two westernmost PGE wells? This doesn't look right. The one near the river looks like the Cal Trans well and the other looks like the Caliente Ranch well (private)	This data was pulled from the USGS report <i>Geology, Water-Quality, Hydrology, and Geomechanics of the Cuyama Valley Groundwater Basin</i> , California, 2008–12 < https://pubs.usgs.gov/sir/2013/5108/ >. Based on the data provided in this report, these wells were sampled by PG&E.
4	Jane Wooster		P. 2-43			The majority of agricultural activity occurs"	Just delete "near the north fork." There is no "north fork." North Fork Cattle Co. was formed in 1970 in San Juan Capistrano and just happened to buy and own property west of the Russell Fault at one time	The text has been revised
5	Jane Wooster		P. 2-117				Reach 8-School House Cyn. Creek: On figure 2-61 Reach 8 is on the wrong place. You have labeled it School House Cyn Creek but it is actually Aliso Cyn. Should 8 be changed or should the map be changed?	The text has been revised to say Aliso Canyon Creek
6	Jane Wooster		2.2.8				Interconnected Surface Water Systems: This section seems incomplete. At least some mention should be made that these are only selected surface water systems. There are other creeks that run longer than those mentioned and surely Branch Creek and Salisbury Cyn are worth mentioning if only due to the frequency of their flooding	The text has been modified to note that these are the stream reaches that are explicitly simulated in the numerical model.
7	Jane Wooster		2.2.9			Groundwater occurring near the ground surface	GDEs: what is that supposed to mean? I object to 1) how this data was collected and 2) that a great deal of it is based on supposition and 3) your unwillingness to come out and state such. What exactly are "remote sensing techniques"? Why on Figure 2-63 do you use TNC identified potential GDE wetlands and TNC identified potential GDE vegetation? Why not use the wetlands and vegetation areas identified in the NCD dataset which appears to be much more accurate and complete? Furthermore, I was unable to find any site that could identify the 123 probably GDE's on the 275 probable non-GDE's in the Basin. Additionally, it is never actually admitted the no one ever looked at the sites for this data. Your biologist came to California, came to the Cuyama Valley, but not much effort was made to access the most important ecosystems on the ground. Academic white wash. In your technical you state "the field study was conducted only on publicly accessible lands." Then you say "Field observations were made pm MCCAG-mapped seeps springs..." inderring that these areas were observed which they weren't as most of them are on private ground or are inaccessible.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.
8	Jane Wooster		2.2.10			"The Cuyama River is not gauged"	DATA GAP. Third bullet point. That's not even possible. This is enough to invalidate this entire GSP. According to your Appendix C to Ch 2 P. C-7, "the USGS has two active gages that record flows in the Cuyama River watershed upstream of the Lake Twitchell. These include one gage on the Cuyama River downstream of the basin (ID 11136800) which is located just upstream of Lake Twitchell. "The other active gage is south of the city of Ventucopa..." The watershed for Twitchell Reservoir includes a much larger area than the Cuyama Basin. Any estimate from their stream gauge would have to be modeled for areas of flow and results would only be an estimate.	The bullet has been revised to note that available precipitation data was used in addition to downstream surface flow records to estimate flows in the Basin
9	Sue Blackshear						As regards Groundwater Dependent Ecosystems - GDE's: The Nature Conservancy recognized 2000 acres of GDE's in the Cuyama Basin. The GSP reduced that area to 500 acres, based on a biologist spending a day and a half on a computer, never visiting the sights. The GDE's are where the native plants, animals, birds and the pollinators still thrive because of the availability of nature springs and seeps. They provide a vision of how more of the land would look in its recovery. The GDE's need to be protected from further degradation. I feel that the present GSP does not recognize their importance.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.
10	Neil Currie	Cleath Harris	P. 2-14 Figure 2-3				The Upper and Lower Morales are unconformable (Seismic Lines-Ellis 1994)-Figure does not convey this, and text does not reflect this. This unconformity is the basis for delineating these two units for most seismic work within the valley	We are unable to find the unconformity between the Upper and Lower Morales Formation in Seismic Lines-Ellis 1994. This section can be updated with more information during the 2025 GSP update.
11	Neil Currie	Cleath Harris	P. 2-52 Figure 2-21				South Cuyama Oilfield does not reflect CA DOGGR oilfield shape/location	The figure has been revised.
12	Neil Currie	Cleath Harris	P. 2-61 Figure 2-26				Russell fault is not continuous across the valley, published field maps (Dibblee, Nevins, Schwing, DeLong) show this fault to be continuous across valley.Fault has 18+ miles of lateral displacement and should be continuous	The representation of the fault in the figure has been revised.
13	Neil Currie	Cleath Harris	P. 2-88 Figure 2-43				Russell fault is not continuous across the valley, published field maps (Dibblee, Nevins, Schwing, DeLong) show this fault to be continuous across valley.Fault has 18+ miles of lateral displacement and should be continuous	The representation of the fault in the figure has been revised.
14	Neil Currie	Cleath Harris	P. 2-90 Figure 2-44				Russell fault is not continuous across the valley, published field maps (Dibblee, Nevins, Schwing, DeLong) show this fault to be continuous across valley.Fault has 18+ miles of lateral displacement and should be continuous	The representation of the fault in the figure has been revised.
15	Neil Currie	Cleath Harris	P. 2-91 Figure 2-45				Russell fault is not continuous across the valley, published field maps (Dibblee, Nevins, Schwing, DeLong) show this fault to be continuous across valley.Fault has 18+ miles of lateral displacement and should be continuous	The representation of the fault in the figure has been revised.
16	Neil Currie	Cleath Harris	P. 2-94 Figure 2-46				Russell fault is not continuous across the valley, published field maps (Dibblee, Nevins, Schwing, DeLong) show this fault to be continuous across valley.Fault has 18+ miles of lateral displacement and should be continuous	The representation of the fault in the figure has been revised.
17	Neil Currie	Cleath Harris	P. 2-96 Figure 2-47				Russell fault is not continuous across the valley, published field maps (Dibblee, Nevins, Schwing, DeLong) show this fault to be continuous across valley.Fault has 18+ miles of lateral displacement and should be continuous	The representation of the fault in the figure has been revised.
18	Neil Currie	Cleath Harris	P. 2-97 Figure 2-48				Russell fault is not continuous across the valley, published field maps (Dibblee, Nevins, Schwing, DeLong) show this fault to be continuous across valley.Fault has 18+ miles of lateral displacement and should be continuous	The representation of the fault in the figure has been revised.
19	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 2-33			In general, conductivity is highest near the center of the Basin...	What is the basis for this conclusion? Show maps of data to confirm this conclusion and relate finding to previous work (e.g., USGS texture analysis). The distribution of aquifer properties influences the distribution of model-calculated water levels and groundwater storage declines, which are the basis for defining Management Areas and pumping allocations.	The center of the Basin near the streambed is made up primarily of younger alluvium, which is generally associated with higher conductivity.
20	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 2-125			The Cuyama River is not gaged ...	What parameters are most influential on these flows and model-calculated recharge from river leakage?	Text has been added to Appendix C to discuss these parameters.
21	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 2-125			Faults are not well understood with regard to the ...	What does model testing show regarding the sensitivity of model-calculated water level and storage changes to the conductivity of these faults?	The calibrated numerical model shows limited flows occurring across these faults. This can be re-evaluated in the future when more data is available.
22	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 2-28			shows the outcrops of bedrock near the Russell Fault ...	Beginning of sentence is missing something.	The text has been corrected
23	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 2-51			Figure 2-22 shows major faults ...	Should be Figure 2-21.	The text has been corrected

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 2
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
24	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 2-52				Faults shown are not consistent with faults shown on Figure 2-8 and those represented in the model.	This figure is not intended to show all of the faults in the Basin
25	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 2-125			The Cuyama River is not gaged ...	What does model sensitivity testing show regarding these features?	Text has been added to Appendix C to discuss these parameters.
26	Brenton Kelly	Quail Springs Permaculture	P. 2.8 to 2.9			Piper diagrams are useful for understanding...	Suggestion: Please list these terms alphabetically. Addition: This Plan should use Piper diagrams from a full schedule of constituents to better understand basis recharge dynamics. Not just TDS alone.	Comment noted. These have been re-ordered alphabetically
27	Brenton Kelly	Quail Springs Permaculture	P. 2.32 Sec. 2.1.7			DWR's Groundwater Glossary defines an aquifer as...	Question: How does DWR define an Aquitard? Question: What "field tests" were performed as part of this study effort? Or is all this interpreted from the USGS and other published study? Was there any new ground truthing done in this study?	This has been added to the text.
28	Brenton Kelly	Quail Springs Permaculture	P. , 2.45 Figure 2.17			Surface Water	Addition: Please include major drainages of Ballinger Canyon, Branch Wash & Cottonwood Canyon. Upper Cuyama is misnamed and should be "Reyes" Creek.	The figure has been revised.
29	Brenton Kelly	Quail Springs Permaculture	P. 2.52 Figure 2.21			Cuyama Basin Landmarks	Corrections: Burges Canyon is misspelled and Bitter Creek is misnamed and should be Branch Wash	Burges Canyon label has been updated. The "Bitter Creek" label is what is utilized in the National Hydrologic Data Set shapefile. According to USGS Topo maps, Branch Wash is actually just east of the Bitter Creek line and is therefore correctly labeled.
30	Brenton Kelly	Quail Springs Permaculture	P. 2.53, Sec. 2.2.1			Useful Terms	Suggestion: Please list these terms in alphabetical order.	These have been re-ordered alphabetically
31	Brenton Kelly	Quail Springs Permaculture	P. 2.74 Figure 2.36 thru 2.38			Vertical Gradients	Comment: These multiple depth compilation wells are of great importance in determining vertical gradients. However since 2014, CVKR, CVBR and CVFR are missing the high (winter) and low (summer) measurements making the interpretation of vertical gradients less accurate. Suggestion: Return to quarterly monitoring ASAP. Addition: Install several more of these types of well for monitoring the Vertical Gradient around the major Faults; SBCF & Russell Faults.	Comment noted. This can be considered during GSP implementation.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 2
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
32	Brenton Kelly	Quail Springs Permaculture	P. 2.81 Sec. 2.2.3			The gradient increases in the vicinity of the SBCF and flows to an area of ...	Comment: This map actually shows that the groundwater under the bridge of 166 has reversed gradient and is flowing southeast, 180° opposite of streamflow and topographic gradient. Suggestion: Text should point this phenomenon out for the significances it represents. A 600' deep cone of depression is more than just an area of lowered elevations. Addition: The title of Figure 2.39 should include "Groundwater Flow Direction"	The text has been revised. No change needed to the Figure as Groundwater Flow Direction is noted in the legend.
33	Brenton Kelly	Quail Springs Permaculture	P. 2.99 Sec. 2.2.4			Average annual use over the 20-year period was -23,076 acre-feet.	Correction: The word "use" is incorrect and should be "overdraft".	The text has been revised
34	Brenton Kelly	Quail Springs Permaculture	P. 2.99 Sec. 2.2.4			Cuyama Groundwater Storage by Year, Water Year Type, and Cumulative Water Volume	Comment: This chart shows 1 million AF lost from storage over the last 20 years! What about the previous 20 years? Question: How much more storage will be lost before sustainability in 2040? What Undesirable Results does this GSP recognize because of this historic overdraft?	Comment noted. The undesirable results definitions in the GSP are tools to measure future Basin conditions, not past conditions.
35	Brenton Kelly	Quail Springs Permaculture	P. 2.103 Sec 2.2.7			DWR GeoTracker California Groundwater Ambient ...	Comment: This GAMA report is referenced for TDS, but does not discuss any of the other conclusive evidence by way of the age dating and "fingerprinting" water by source. The lack of any tritium indicates there is no recent recharge and groundwater production is sourcing fossil water, over 30 thousand years old. Addition: Fully utilize GAMA for groundwater quality understanding and protection. Continue to collect similar data moving forward.	Comment noted. This can be considered in the future if direction is provided by the GSA Board.
36	Brenton Kelly	Quail Springs Permaculture	P. 2.117 Sec. 2.2.8			Stream Reaches Used in Cuyama Groundwater Model...	Comment: This attempt to depict the interconnectivity of surface water is much appreciated, yet it could be improved with some clarifications and additions. Question: How were the reaches determined? Why not Apache? Why Schoolhouse and not Cottonwood? Addition: Please add to Figure 2.61 the values of average annual gain or loss by Reach from Table 2.2.	The text has been modified to note that these are the stream reaches that are explicitly simulated in the numerical model.
37	Brenton Kelly	Quail Springs Permaculture	P. 2.126 Sec. 2.3				Suggestion: Please list these terms in alphabetical order.	Comment noted. These have been re-ordered alphabetically
38	Brenton Kelly	Quail Springs Permaculture	P. 2.132 Sec. 2.3			Table 2.4 & 2.5	Comment: The Model and the Budget do not take into consideration the effect of more than 500' of dewatered vadose zone. This can drastically affect the calculation for "Deep Percolation" from precipitation and applied water. Age dating shows no recent recharge. (See comment 23) Question: How is deep percolation through the vadose assumed and justified as recharge? What data disputes GAMA's lack of recharge?	Comment noted. The numerical model can potentially be revised in the future as additional data is available.
39	Brenton Kelly	Quail Springs Permaculture	P. 2.146 Sec 2.3			Table 2.7	Comment: It is great to know a number for sustainable yield but this plan lacks a means of getting there! Question: If the sustainable yield for the basin is 20 TAF, what is the Plan for reducing pumping by 55 to 67%?	This is discussed in Chapter 7. Specifics can be determined during GSP implementation.
40	Erinn Wilson	California Department of Fish and Wildlife Region 5	2.1.6				The GSP should provide more information on groundwater extraction well depths throughout the basin including how it compares with the depth of the Morales geologic formation. Wells that extend outside the vertical limits of the basin should be included within the SGMA regulations. Well depth should be included in the determination of the basin bottom to capture such occurrences.	Data was not available to perform these analyses in advance of the GSP. Additional detail can potentially be added as additional data is collected in the future.
41	Erinn Wilson	California Department of Fish and Wildlife Region 5	2.1.7				The GSP identifies that the aquifer is unconfined and continuous, except for locally perched clay aquifers. These perched water resources can provide essential habitat and sustenance for various wildlife species including plants, aquatic animals and migratory refugia for avian species. To enhance the effectiveness and utility of the GSP, CDFW requests the following information be included: a) Identify where perched aquifers exist within the basin and describe, by each aquifer, if they: 1) are being used by domestic shallow wells; 2) support GDEs; and, 3) have interactions with surface water. b) Document the characteristics of each perched aquifer, including thickness, porosity, hydraulic conductivity, and vertical gradients to more recent alluvium aquifers.	Data was not available to perform these analyses in advance of the GSP. Additional detail can potentially be added as additional data is collected in the future.
42	Erinn Wilson	California Department of Fish and Wildlife Region 5	2.1.7				As described in Section 2.1.7, the GSP identifies that the aquifer is unconfined and continuous, except for locally perched clay aquifers. The model results appear to support that the entire river is an interconnected surface water system [23 CCR §351(o)]; therefore, GDEs that exist within the basin rely more on availability and health of the aquifer. The GSP should include additional information on annual average stream depletion by reach (see Table 2-2), including identifying losing and gaining segments.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.
43	Erinn Wilson	California Department of Fish and Wildlife Region 5	2.2.9				Section 2.2.9 does not adequately identify GDEs within the Basin. Mapping GDEs and other beneficial uses/users is an essential component in the consideration, development and implementation of GSPs (Water Code §10723.2) and in assessing if conditions are having potential effects on beneficial uses and users of groundwater. GSAs must also include sustainable management criteria and monitoring to detect adverse impacts. CDFW believes the elimination of a large portion of the data pertaining to GDEs may have been premature. We recommend that best scientific data on depth to groundwater be included in the analysis of interconnected surface waters before any data is excluded. Other data should include (but not be limited to): USGS mapped springs/seep and comparing recent groundwater level contours to vegetation root zones. In addition, relying solely on soils information is not recommended. For example, the presence of sandy, dry, and friable soils, does not mean that existing plant species do not rely on groundwater for some portion of their life cycle. Capillary fringe associated with root networks from native plants could be accessing groundwater from deeper depths. In addition, restoration projects that provide direct benefits to sensitive riparian resources, such as slowing river velocities during high flow events which benefits the Cuyama Basin by allowing for increased surface water infiltration into the subsurface aquifer, should be identified as GDEs and mapped in the GSP. Beneficial use in the form of future riparian enhancement projects should be included in the GSP.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board.
44	Julie A. Vance	California Department of Fish and Wildlife Region 4					The Department has documented populations of several sensitive species on the restoration site and these species should be listed as beneficial users of groundwater. They are all vulnerable to groundwater pumping impacts and include California red-legged frog (<i>Rana draytonii</i>), tricolored blackbird (<i>Agelaius tricolor</i>), western spadefoot (<i>Spea hammondi</i>), southwestern pond turtle (<i>Actinemys pallida</i>), yellow warbler (<i>Setophaga petechia</i>), Arroyo chub (<i>Gila orcuttii</i>), and California roach (<i>Lavinia symmetricus</i>). All of these species have benefitted from the restoration project which may eventually provide habitat for the state listed least Bell's vireo (<i>Vireo bellii pusillus</i>) and willow flycatcher (<i>Empidonax traillii</i>). The importance of the restoration site is reflected in Figure 2- 63 which shows a high density of GDE elements in the northwestern corner of the Basin. Beneficial use in the form of future riparian enhancement projects should be included in the GSP.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board.
45	Cathy Martin	SLO County	2.3			The change in the annual volume	Please elaborate on if you are also using drought and wet years?	This is described when water budget numbers are presented in subsequent sections.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 2
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
46	Cathy Martin	SLO County	2.3 P. 2-126			Figure 2-64 presents	Please verify if the right figure is in the text. The listed figure and text description are not matching for Figure 2-64.	The figure reference has been corrected
47	Cathy Martin	SLO County	2.3 P. 2-126			Domestic water use is the volume	Please clarify what non-potable water is being used in Cuyama Basin for Domestic Water Use (such as is related to collecting rain water for irrigation)?	This information is not currently available.
48	Cathy Martin	SLO County	P. 2-127			Figure 2-65:	Please fix format (extras colon or period).	This has been corrected.
49	Cathy Martin	SLO County	P. 2-128			The cumulative departure of the...	Consider revising sentence for clarity, "...The cumulative departure of the spatially averaged of the rainfall..."	The text has been revised.
50	Cathy Martin	SLO County	P. 2-132			The estimated average annual water budgets...	Please verify the right table numbers are in the text. The listed tables and text description are not matching for Tables 2-3 and 2-4.	The table references have been corrected.
51	Cathy Martin	SLO County	Table 2-6			Water Year Type	Consider adding more information on water year type, maybe a note under the Table 2-6 to clarify.	The water year types are defined in a footnote on the previous page.
52	Sandi Matsumoto	The Nature Conservancy	P. 2-31				[Checklist item #2]: It is currently unclear how existing well depths compare with the depth of the upper member of the Morales Formation. According to DWR's Hydrogeologic Conceptual Model BMP3, "the definable bottom of the basin should be at least as deep as the deepest groundwater extractions". Thus, groundwater extraction well depth data should also be included in the determination of the basin bottom. This will prevent the possibility of extractors with wells deeper than the basin boundary from claiming exemption of SGMA due to their well residing outside the vertical extent of the basin boundary.	Data was not available to perform these analyses in advance of the GSP. Additional detail can potentially be added as additional data is collected in the future.
53	Sandi Matsumoto	The Nature Conservancy	P. 2-32				[Checklist item #3]: In paragraph 1, "The aquifer is considered to be continuous and unconfined with the exception of locally perched aquifers resulting from clays in the formation". Please provide more details on: <ul style="list-style-type: none"> • the location of perched aquifers • whether perched aquifers are being used by domestic shallow wells, GDEs and/or are potentially interacting with surface water • the vertical gradients between the perched aquifers and the recent and younger alluvium aquifers • other aquifer characteristics that may be known (e.g., perched aquifer thickness, porosity, hydraulic conductivity) 	Comment noted. Additional detail can potentially be added in future versions of the GSP as additional data is collected in the future.
54	Sandi Matsumoto	The Nature Conservancy	P. 2-117				[Checklist item #4]: The model results are demonstrating that the entire river is an interconnected surface water system ("surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted" 23 CCR §351(o)). Based on the annual average stream depletion by reach (Table 2-2), it appears that losing and gaining reaches of the Cuyama can be mapped. Please distinguish the gaining and losing reaches. The data provides seems to indicate: o Gaining: Reach 1, Reach 3, Reach 6, Reach 8, Reach 9. o Losing: Reach 2, Reach 4, Reach 5, Reach 7	Data was not available to perform these analyses in advance of the GSP. Additional detail can potentially be added as additional data is collected in the future.
55	Sandi Matsumoto	The Nature Conservancy	P. 2-121				SGMA requires that all beneficial uses and users, including GDEs, be considered in the development and implementation of GSPs (Water Code §10723.2). The GSP Regulations include specific requirements to identify (map) GDEs and consider them when determining whether groundwater conditions are having potential effects on beneficial uses and users. SGMA also requires an assessment of whether sustainable management criteria (including minimum thresholds and measurable objectives) may cause adverse impacts to beneficial uses, including GDEs, and that monitoring networks are designed to detect such impacts. Therefore, mapping GDEs is a critical first step for incorporating environmental considerations into GSPs. [Checklist item #7]: • It appears that the preliminary desktop analysis, completed by Woodard & Curran and documented in Appendix D of the draft GSP, resulted an excessive elimination – totaling two-thirds – of the NC dataset polygons mapped in the Cuyama Basin. In particular, the methods and field verification approach described in the draft GSP failed take groundwater levels into consideration. SGMA defines GDEs as "ecological communities and species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface". We recommend that depth to groundwater contour maps are used to verify whether a connection to groundwater exists for polygons in the NC Dataset. Please refer to Appendix D of this letter for best practices for using groundwater data to verify a connection to groundwater.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board.
56	Sandi Matsumoto	The Nature Conservancy	Figure 2-64				[Checklist items #8 & 9]: Decisions to remove, keep, or add polygons from the NC dataset into a basin GDE map should be based on best available science in a manner that promotes transparency and accountability with stakeholders. Any polygons that are removed, added, or kept should be inventoried in the submitted shapefile to DWR, and mapped in the plan. We recommend revising Figure 2-64 to reflect these requirements.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board.
57	Sandi Matsumoto	The Nature Conservancy					[Checklist item #10]: Groundwater conditions within GDEs should be briefly described within the portion of the Basin Setting Section where GDEs are being identified. Please refer to Attachment E of this letter for details on a new, free online tool that enables groundwater sustainability agencies to assess historical and current trends of growth and moisture content in vegetation using 35 years of satellite imagery for all of the polygons in the NC dataset.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board.
58	Sandi Matsumoto	The Nature Conservancy					[Checklist item #16]: Not all GDEs are created equal. Some GDEs may contain legally protected species or ecologically rich communities, whereas other GDEs may be highly degraded with little conservation value. Including a description of the types of species (protected status, native versus non-native), habitat, and environmental beneficial uses (see Worksheet 2, p.74 of GDE Guidance Document) can be helpful in assigning an ecological value to the GDEs. Identifying an ecological value of each GDE can help prioritize limited resources when considering GDEs as well as prioritizing legally protected species or habitat that may need special consideration when setting sustainable management criteria.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board.
59	Neil Currie		Appendix D				Appendix D lists assessment of aerial photography as a means of assessing GDE, but does not document which datasets were used for this effort making it difficult to reproduce/assess this effort.	Section 2.2.9 notes that the biologist assessed the NCCAG dataset available through the SGMA data portal at https://gis.water.ca.gov/app/NCdatasetViewer/
60	Brenton Kelly	Quail Springs Permaculture	P. 2.221 Sec. 2.2.9 Appendix D			Groundwater Dependent Ecosystems	Comment: The elimination of 2/3 of the probable GDEs from the NCCAG dataset by using remote sensing techniques and very few in-field site inspections is inadequate to identify GDEs or determine whether sustainable management activities may cause adverse impacts to GDEs.	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.

Cuyama Basin Sustainability Section
 Summary of Public Comments and Responses - Chapter 2
 June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
61	Sandi Matsumoto	The Nature Conservancy	Appendix D				<p>More specific comments related to the desktop analysis approach (as described in Appendix D of the GSP) include:</p> <ul style="list-style-type: none"> Inundation visible on aerial imagery – This method is inappropriate because it is not possible to know whether surface water is connected with groundwater by visually inspecting it with aerial imagery. For example, in some cases surface water can be completely disconnected from groundwater, so in this scenario this approach would falsely suggest that NC dataset polygons are connected to groundwater. Similarly, if surface water is not present, this method would also falsely suggest that NC dataset polygons are not connected to groundwater if plant communities and the species they support are accessing groundwater beneath the surface. This method also fails to account for the fact that GDEs can rely on groundwater for some or all its water requirements, which in California often vary by season, and depend on the availability of alternative water sources (e.g., precipitation, river water, reservoir water, soil moisture in the vadose zone, groundwater, applied water, treated wastewater effluent, urban stormwater, irrigated return flow). off aerial imagery is to be used, a range of dates should be selected to reflect the California's Mediterranean climate, seasonal variations and water year types. oPhreatophytes (groundwater-dependent vegetation) often rely on groundwater that is occurring near the ground surface via their rooting network. Because these sources of groundwater are not detectable using aerial imagery, the images should be compared with contoured groundwater levels to determine whether groundwater levels are close enough to vegetation root zones. oWe suggest the methods be revised and clarified accordingly. Saturation visible on aerial imagery could indicate many different conditions, including standing water or saturated soils that may be ephemeral, intermittent, or permanent in nature. To help verify what the images actually indicate, this method should be coupled with more advanced remote sensing methods. Please clarify if this was the case. Dense riparian and/or wetland vegetation visible on aerial imagery can help identify potential GDEs but is not an appropriate method to screen for whether a polygon is supported by groundwater and in fact a GDE. The presence of sparse vegetation also does not preclude the possibility that vegetation are using groundwater. Many desert and semi-arid environments with sparse vegetation can still be groundwater dependent ecosystems. 	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.
62	Sandi Matsumoto	The Nature Conservancy	Appendix D				<p>More specific comments related to the GDE field validation approach (as described in Appendix D of the draft GSP):</p> <ul style="list-style-type: none"> The removal of Probable Non-GDE 1 and Probable Non-GDE 2 was based on the presence of sandy, dry, and friable soils was not scientifically justified. The presence of this soil type does not preclude the possibility that the dominant plant species observed are reliant on groundwater at depths below the earth surface. For example, a rooting depth of 13 feet has been observed for <i>Ericameria nauseosa</i> and >4 feet for <i>Eriogonum fasciculatum</i>, and the capillary fringe associated with those rooting networks could be accessing groundwater from deeper depths, depending on the hydraulic conductivity of the substratum. For more rooting depth data, please refer to TNC's global rooting depth database, available at: https://groundwaterresourcehub.org/gde-tools/gde-rooting-depths-database-for-gdes/ 	The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board.
63	Jane Wooster		Item 4 Conclusions P.4			The Cuyama Valley Groundwater basin is...	Further comments on GDEs TM: delete "oil and gas exploration and production, ranching." Was this even written by Woodard & Curran? Shame on you. You have not been listening to all those hours of public comments. Ranching, i.e. grazing, is a de minimis user of water. Delete ranching. The oil and gas industry in the valley is a de minimis user of water. Delete oil and gas industry.	The text has been revised
64	Jane Wooster		Figure 3				Further comments on GDEs TM: Including this area map and not including the other GDE NCCAG area maps is highly misleading. Your photos are so few as to be misleading.	Comment noted. Additional analysis can potentially be performed on GDEs in the future.
65	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-3			The Technical Forum held 14 monthly conference calls over ...	Model files not provided for review until 2/18/19 - late in the process.	Comment noted.
66	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-4			CBWRM Development	There should be a discussion of the range of aquifer parameters used in the model and how they compare to measured values. Include figures showing the distribution by layer. Hydraulic conductivity values used in the model are lower than those reported by the USGS for the Morales formation (layer 3). The calculated groundwater-storage decline within Management Areas is sensitive to the specified values of hydraulic conductivity. Hence, the recommended pumping allocations are sensitive to hydraulic conductivity.	Ranges of aquifer parameters have been added to the uncertainty section. Additional information can be added in the future as more data becomes available.
67	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-4			The CBWRM historical model simulates Basin hydrologic ...	Why were daily time step selected? Does data support daily time steps? Version provided for review runs only through September 30, 2015.	A daily time step was selected to allow for simulation of the highly variable surface water hydrology in the Basin.
68	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-4			CBWRM Development	No discussion of aquifer properties, no map of aquifer properties, no comparison to measured values. Basin Setting indicates that subsidence has occurred in the basin. Should subsidence be included in the model, especially for future scenarios with continued WL decline?	Subsidence could be considered in future versions of the model.
69	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-7			The hydrologic conditions of these small watersheds used to estimate the subsurface and surface flows are...	Inflow from the small watersheds is an important component of the basin water budget. How were small watershed parameters determined? What data were used to constrain these parameters and calibrate/verify small watershed flow? More importantly, how did uncertainty in these parameters influence model-calculated water budgets and the calculated decline in groundwater storage? Was inflow from small watersheds only applied to layer 1? Why? Was the water budget and model-calculated decline in groundwater storage influenced by the lack of recharge to the deeper layers?	The text has been revised.
70	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-7			CBWRM Grid Cuyama Water District boundary ...and to contain relatively finer resolution along rivers, which ...	There are some areas where the element edges don't follow the CBWD boundary.	Comment noted.
71	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-7			...and surface flows are represented using parameters...	Mesh size doesn't appear to be finer along several stream reaches. Finer elements seem to be along faults more than some of the stream reaches.	Comment noted. Not all stream reaches are explicitly simulated in the model.
72	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-7			...and surface flows are represented using parameters...	How were these parameters determined? How was flow from the small watersheds calibrated/verified?	The text has been revised.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 2
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
73	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-8			The average annual precipitation	Calibration period (1995-2017) was relatively wet compared to long-term average (1967-2017).	Comment noted.
74	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-8			Attachment 1 describes the...	Labeled as Attachment C-2 in document.	This has been corrected.
75	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-9 Figure C-2			Cuyama Valley Groundwater Basin IWFM ...	Faults shown are not consistent with faults in the model.	The figure has been updated
76	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-11 Figure C-3				It would be helpful to show precipitation for small watersheds to illustrate the variability in precipitation in these watersheds and its influence on the water budgets.	A table of average annual precip for each watershed has been added to the figure
77	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-15			Spatial land use data were used to specify ...	How was existing data used to interpolate land use for years with no data?	Private landowner data was provided and used for every year in the calibration period. This represented most of the irrigated land area in the Basin. In other parts of the Basin, data from the closest available year was used for years when data wasn't available.
78	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-15			2014 and 2016 data that were...	2016 LandIQ data not shown on cited DWR Land Use Viewer	Comment noted. LandIQ has completed 2016 land use data for DWR, but the data has not yet been posted to DWR's land use viewer. It is expected to be posted by the end of 2019.
79	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-15			2000, 2003, 2006, 2009, 2012 data	Labeled as Attachment C-1 in document.	This has been corrected.
80	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-15			The projected annual land use	This needs more explanation.	Additional detail has been added.
81	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-17			The RSRZ Model is driven by the Landsat ...	This is the only discussion of the RSRZ model. More explanation on the model and how crop coefficients were developed is needed. Crop coefficients are a key component in estimating crop demand and, therefore, pumping demand and ultimately groundwater storage decline.	An attachment has been added with additional information on how crop evapotranspiration was determined. The acronym RSRZ has been removed from the document.
82	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-17			The reference evapotranspiration	Labeled as Attachment C-1 in document.	This has been corrected.
83	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-17			In the CBWRM, ET represents the net	ET is flux from the land surface/root zone to the atmosphere.	Comment noted. This is consistent with the text currently in the document.
84	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-18			CBWRM Layering	The unsaturated zone not represented in the model, and the existing configuration assumes deep percolation from the root zone reaches the water table instantaneously. This is not reasonable given the substantial depth to the water table in substantial portions of the basin. Model results will be sensitive to the time lag between infiltration/deep percolation and interception by the water table. An explanation is needed to justify ignoring the time-lag effect of the unsaturated zone.	Inadequate information was available on unsaturated zone parameters to effectively calibrate the time-lag effect. This can be modified in future versions of the model when more data is available.
85	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-18			CBWRM Layering - The CBWRM subsurface	Provide maps of layer extents and general statistics on layer thicknesses.	New figures have been included to show the layer extents and thicknesses
86	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-22			This assumption, however, results in the use of first ...	Did uncertainty/errors in the transients represented by the "start-up" initial heads dissipate during the "first few years?" Did analysts confirm errors did not influence model calibration and the resulting calculation of groundwater storage declines?	Yes, comparison of simulated groundwater levels with observed values confirmed that initial heads did not affect the calculation of groundwater storage declines.
87	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-22			As discussed in the previous section	Was inflow from small watersheds only applied to layer 1 rather than the deeper layers? Why?	The text has been revised.
88	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-22			Therefore, the model calibration period	Calibration time period inconsistent with statement on page C-24.	The calibration period on page C-22 has been corrected.
89	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-23			Calibrate Water Demands estimates for agricultural...	What data were used for calibration of water demand? Water demand is a key factor influencing groundwater pumping and the magnitude of estimated pumping allocations required to achieve "sustainable" conditions.	An attachment has been added with additional information on how crop evapotranspiration was determined. The acronym RSRZ has been removed from the document.
90	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-24			Due to uncertainty in the initial conditions...	The calibration period reported here is inconsistent with a previous statement of calibration period (1998-2015) on page C-22.	The calibration period on page C-22 has been corrected.
91	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-24			The calibrated IDC was used to	Inconsistent with daily time steps in model.	Comment noted. The monthly time step was adequate for IDC calibration.
92	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-24			The flows from this gage were	How were stream flows adjusted to estimate flow at downstream end of basin?	Additional text has been added on the small watershed computations.
93	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-25			During this step of the calibration	What data was used to calibrate the water budget? What constraints were placed on the water budget calibration?	Water budget calibration was based on a general understanding of flows in the Cuyama Basin (as reflected in the HCM) and on ensuring internal consistency of CBWRM results, spatially and temporally.
94	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-26			Outflows: Groundwater pumping	GW budget shows there is outflow from GW to the streams (stream gains).	This has been corrected.
95	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-28			Within the CBWRM, 139 wells	Far fewer than 139 wells visible on the map.	The figure has been updated

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 2
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
96	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-29			The goal of groundwater level	How was the reasonable range determined? There is no discussion of the range of aquifer parameters and how they compare to measured values. Hydraulic conductivity values used in the model are lower than those reported by the USGS for the Morales formation (layer 3)	A comparison of CBWRM and USGS hydraulic conductivity values has been added to the uncertainty section. Other parameter values are based on measured values or values in the literature.
97	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-29 Figure/Table C-16 and C-17			Figures C-16 and C-17 show a	What do figures look like with reasonable changes to aquifer properties?	Versions of these figures with a range of aquifer parameters were presented at the June 5 Board meeting.
98	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-31			To incorporate the uncertainty that originates from various ...	Describe the ensembles of perturbed simulations. More information is needed on uncertainty/sensitivity analysis. Which parameters (IDC, small watershed, and groundwater) were evaluated and which were the most/least sensitive? A thorough sensitivity evaluation will provide a range of plausible groundwater storage declines and provide flexibility in determining Management Actions need to reach sustainability.	Additional information has been provided in the Uncertainty Assessment section.
99	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-31			Uncertainty Assessment	Need more information on uncertainty/sensitivity analysis. Which parameters were most/least sensitive for both GW and IDC parameters.	Additional information has been provided in the Uncertainty Assessment section.
100	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-32			GSP stakeholder and Technical Forum have reviewed model development and ...	The Tech Forum did not receive the model files for review until 18 February 2019. The model development was essentially complete at this point. EKI's brief review of the model identified potential issues of concern such as a lack of agreement between measured and modeled aquifer properties and a lack of sensitivity testing and reporting. Simple sensitivity tests performed by EKI showed that hydraulic conductivity values have a significant influence on groundwater storage changes in the Management Areas. As a member of the Tech Forum, EKI did not make the statement that the CBRWM is a "strong analytical tool," nor do we recall hearing a consensus for this statement during any Tech Forum meeting. EKI's position has been that it is a reasonable tool to use given substantial limitations in the data available and compressed schedule to develop the model. However, it is critical that results from model implementation ("using" the tool) include characterizing model uncertainty (in other words, quantify how wrong the result might be).	Comment noted. The text has been revised. Additional uncertainty results have been added to the uncertainty assessment section.
101	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-33			The following recommended actions would support ...	Perform a post-audit on the model. A post-audit evaluates how model predictions using actual "future" climate and water availability conditions compare to measured conditions, and results from the comparisons provide insight into the strengths and weaknesses of the HCM and model parameter values.	The text has been revised.
102	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	C-33			These include eastern art of the basin	Misspelled word	This has been corrected.
103	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-1 ; 1			The most common land use in the Cuyama	Is native veg the most common land use?	The text has been revised.
104	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-1 ; 2 Table 1			SUMMARY OF DATA SOURCES	Was Cropscape data considered when developing land use information?	Yes, Cropscape was found to be inadequate in the Cuyama Basin region.
105	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-1 ; 2			Since then, Land IQ has completed statewide	2016 LandIQ data not shown on DWR land use viewer.	Comment noted. LandIQ has completed 2016 land use data for DWR, but the data has not yet been posted to DWR's land use viewer. It is expected to be posted by the end of 2019.
106	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-1 ; 5			SUMMARY OF CROP MAPPING RESULTS	How was land use estimated for years in which no data are available?	Private landowner data was provided and used for every year in the calibration period. In other parts of the Basin, data from the closest available year was used for years when data wasn't available.
107	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-1 ; 6			SURFACE ENERGY BALANCE	How does the RSRZ model described in the main text come into play here?	An attachment has been added with additional information on how crop evapotranspiration was determined. The acronym RSRZ has been removed from the document.
108	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-1 ; 10			Crop variety and irrigation methods	Figure C-12 shows that there may be declining ag water demand. That is contradictory to this statement. Is total crop acreage declining?	Crop acreage declined from 2012-2015 but increased in 2016.
109	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-2 ; C-1			...for the Eastern San Joaquin Groundwater Sustainability Plan.	Wrong GSP identified.	This has been corrected.
110	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-2 ; C-1			Guidance for Climate change...	Missing text?	This has been corrected.
111	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-3			Groundwater Level Hydrographs	Why are hydrographs included for wells with no data? These can't be used as a calibration well.	The attachment has been revised to remove wells without observed data
112	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-3			Groundwater Level Hydrographs	Include map showing wells with hydrographs.	This is shown on the updated Figure C-15.
113	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Attachment C-3			Groundwater Level Hydrographs	Model layer is not identified on hydrographs. Does simulated WL differ by layer at these sites?	The model does not show significant deviation between different model layers in most areas of the Basin. Differences in results can be seen in the model data files provided to Technical Forum members.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 3
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
1	Matt Young	SBCWA	3.3				Overall, the statements at the end of each sub-section that the Basin is "not in an undesirable condition" does not mesh with the reality that the Basin has been designated as critically overdrafted and groundwater levels been in decline for decades. The statement at the end of each section should be revised to more clearly and specifically state that the Basin does not currently meet the specific technical criteria for having an undesirable result.	The text has been revised
2	Matt Young	SBCWA	p. 3-6	3rd from bottom			The percentage of wells would most usefully be applied by threshold region, rather than basin-wide.	The CBGSA Board determined to use a Basin-wide standard.
3	Matt Young	SBCWA	3.3.4				This section does not contain a description of the undesirable result for degraded water quality. It is a direct copy of the section on groundwater levels.	Text has been corrected.
4	Matt Young	SBCWA	3.3.5				It seems unnecessary to use the 30% number from previous sections if there are only two stations. It would be clearer to state that if one of the sites exceeds the threshold an undesirable result would occur. Also, the 2 inches per year threshold has not been discussed by the GSA Board.	The percentage is included so that it will still be valid if additional stations are added in the future. The 2 inches per year criteria can be adjusted if directed by the Board.
5	Brenton Kelly	Quail Springs Permaculture	General			Undesirable Results	Comment: This Chapter was first previewed and public comments was made in August of 2018. Those comments, W&C's responses and these revisions were not presented until now in this final public draft. There are substantial policy considerations in this chapter that have never come before the SAC or the GSA in the 10 months of developing this section. Given this timeline I find it very odd that it was never presented for public consideration. Question: What happened to public input?	Comment noted. A review of initial comments indicated that a revised draft would not be helpful until it could be released in combination with the chapter on sustainability thresholds.
6	Brenton Kelly	Quail Springs Permaculture	General			Undesirable Results	Comment: My comment from last summer remains unaddressed; The data clearly indicates 50 years of chronic overdraft with a historic loss of over 1,000,000 AF of storage, more than 400' of groundwater level declines, subsidence rates of approximately 0.8 inches per year, the total loss of the annual Cuyama River surface water base flow, and the desertification of the many GDEs across the basin. This Plan does not accurately present today's conditions. Question: How can this Plan justify not recognizing pre-existing, chronic & persistent Undesirable Results today if not back in 2015?	The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board.
7	Brenton Kelly	Quail Springs Permaculture	P. 3.5 Sec. 3.1			To maintain a viable groundwater resource for the beneficial ...	Question: Is this Goal #1 of more items? What is a "viable groundwater resource" in reference to wells going dry, declining GDEs and interconnected Surface waters, or domestic drinking water quality? Addition: The Sustainability Goal should include aims to achieve MOs and determine whether or not any historic conditions are recognized as Undesirable.	The Sustainability Goal has been updated per direction from the CBGSA Board.
8	Brenton Kelly	Quail Springs Permaculture	P. 3-5, Sec. 3.2			Undesirable Results are defined for use in SGMA ...	Comment: All of the Undesirable Results Statements describe current Cuyama conditions as of 2015. Suggestion: This plan must recognize the historic impact of chronic overdraft for the perspective of how very out of balance the situation has been and for how long. Cuyama has pre-existing Undesirable Conditions, why must this be overlooked in the GSP?	The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board.
9	Brenton Kelly	Quail Springs Permaculture	Sec. 3.3 Global			The Undesirable Result for the chronic lowering of groundwater levels is considered ...	Comment: The decision to set the Identification Threshold at 30% was never discussed at the SAC or GSA or had public comments reviewed & responded to by W&C. Issues include: Monitoring wells are not adequately representative, nor do they have the spatial density to accurately reflect groundwater conditions in many parts of the basin. The Management Area in the Central part of the basin, where most of the overdraft is occurring, contains only 15 Representative wells. There are no Monitoring Wells in the Ventucopa Management Area. (In response to Brenton's email below, I have created two quick maps. There are 15 GW Level Representative Wells within the Management Areas - 15 in the Central and 0 in the Ventucopa Area. Additionally, there are 15 GW Quality Representative Wells within the Management Areas - 15 in the Central and 0 in the Ventucopa Area. - Micah Micah Eggleton Environmental Planner and Scientist Woodard & Curran) Even if 100 percent the monitoring wells in all the currently overdrafted parts of the basin were to fall below their Minimum Thresholds, no Undesirable Results would be identified by this GSP. Question: What criteria was used to justify this critical decision? Or must we just assume that we can not call the current conditions a problem, due to statutory enforcement? Change: The Identification Threshold of 25% Basin wide or maybe 50% if by Region, is a more realistic criteria to define undesirable results for the Management Areas likely to be experiencing them.	The Basin-wide 30% criteria was confirmed by the CBGSA Board
10	Brenton Kelly	Quail Springs Permaculture	Global			Potential Effects of Undesirable Results: All Indicators	Comment: The current Cuyama conditions represent all the potential Undesirable Results such as de-watering of existing groundwater infrastructure (Ventucopa townsite well is dry), adversely affected groundwater dependent ecosystems (mostly dead already), caused changes in irrigation practices, crops grown, and adversely affected property values. Additionally, these Undesirable Results have adversely affected domestic and municipal uses, including uses in disadvantaged communities, which rely on groundwater in the Basin. Suggestion: If the best SGMA and this GSP can do is to avoid any additional Undesirable Results (2015?) from occurring then the Plan must at least be honest about the current conditions to begin with.	The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board. Historical changes in conditions are shown in Chapter 2.
11	Brenton Kelly	Quail Springs Permaculture	P. 3-11, Sec. 3.3.4			The Undesirable Result for the chronic ...	Correction: The text should read Degraded Water Quality, not chronic lowering of groundwater levels. Suggestion: This GSP must establishing minimum thresholds for groundwater levels that are protective of GDEs across the basin. Data Gaps must be filled to know this information.	Text has been corrected. The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board.
12	Brenton Kelly	Quail Springs Permaculture	P. 3.11 Sec. 3.3.5			Chapter 5 discussed how minimum thresholds were ...	Delete: The word "is". Comment: When and by what criteria were minimum thresholds set for anything other than groundwater levels?	Text has been corrected. Thresholds for sustainability indicators other than groundwater levels were included in a previous version of Chapter 5 that was reviewed and commented on.
13	Brenton Kelly	Quail Springs Permaculture	P. 3-11 Sec. 3.3.6			Because measurements show that levels are not in ...	Question: What proxy groundwater measurements show that River flow levels are not in an undesirable condition or that depletion of interconnected surface water is not in an undesirable condition? No such conclusive data exist to make that claim. No gauges, no wetland monitors, no shallow riverside monitoring. Facts on the ground are that the river does not flow like it did not long ago, and the dying Cottonwoods speak to the recent depletions of surface water and degraded Groundwater Dependent Ecosystems. Suggestion: State the data gap issues and try not to speculate that everything is fine when there is no evidence to support that claim, and plenty to refute it. Historically, flowing springs were found along the trace of faults that parallel Graveyard and Turkey Trap Ridges in the main basin. (Singer and Swarzenski USGS 1970) It is not possible to define "significant and unreasonable adverse impacts" without knowing what is being impacted.	The current definition reflects the best understanding given currently available data. The undesirable results definitions for depletion of interconnected surface can be updated when better data is available.
14	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 6-9			Identification of Undesirable Results for Chronic Lowering of Groundwater Levels...	Comment: The decision to set the Identification Threshold at 30% for all five Sustainability Indicators was never discussed or had public comments reviewed and responded to by W&C. Issues include: Monitoring wells are not adequately representative, nor do they have the spatial density to accurately reflect groundwater conditions in many parts of the basin. The Management Area in the Central part of the basin, where most of the overdraft is occurring, contains only 15 Representative wells, and there are no Monitoring Wells in the Ventucopa Management Area. Even if all the monitoring wells in all the currently overdrafted parts of the basin were to fall below their Minimum Thresholds, no Undesirable Results would be identified by this GSP. Question: Who made this policy decision as it never came to the SAC or GSA? Or must we just assume that we cannot call the current conditions a problem, due to statutory enforcement?	The Basin-wide 30% criteria was confirmed by the CBGSA Board
15	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 3-11 Section 3.3.4			The Undesirable Result for the chronic...	Change: The text should read Degraded Water Quality, not chronic lowering of groundwater levels.	Text has been corrected.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 3
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
16	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 3-11	Section 3.3.6		Because measurements show that levels ...	Question: What proxy groundwater measurements show that River flow levels are not in an undesirable condition or that depletion of interconnected surface water is not in an undesirable condition? No such conclusive data exist to make that claim. No gauges, no wetland monitors, no shallow riverside monitoring. Facts on the ground are that the river does not flow like it did not long ago, and the dying Cottonwoods speak to the recent depletions of surface water and degraded Groundwater Dependent Ecosystems. Suggestion: Recognize the already-occurring depletion of surface water, state the current issue accurately, including issues with data gaps, and present an outline of how the CBGSA plans to remedy the gaps and reach Measureable Objectives for Depletions of Interconnected Surface Water.	The current definition reflects the best understanding given currently available data. The undesirable results definitions for depletion of interconnected surface can be updated when better data is available.
17	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 3-11	Section 3.3.5		Chapter 5 discussed how minimum thresholds were selected is. The minimum...	Delete: The word "is". Comment: When and how were minimum thresholds set for this Sustainability Indicator?	Text has been corrected. Thresholds for indicators other than groundwater levels were included in a previous version of Chapter 5 that was reviewed and commented on.
18	Roberta Jaffe and Stephen Gliessman		P. 3-26			The Russell fault offsets the top of bedrock by as much as 1,500 feet (Nevins, 1982), ...	Comment: We concur. Our understanding is the Russell Fault has been inactive for millions of years and is most likely overlaying by permeable layers of older and more recent alluvium that are at least 1000 feet thick. Recommendation: Pump tests and water quality studies need to be done on both sides of the fault.	These recommendations can be considered during GSP implementation.
19	Roberta Jaffe and Stephen Gliessman		P. 3-30			A fault located southwest of the Russell fault runs southeast to northwest and is located...	Recommendation: Field study is needed as a test of the existence and importance of this "unnamed fault" to verify the existence of any Santa Margarita formation (e.g., by finding sandstone with marine fossils). Otherwise this is probably permeable Morales Formation.	These recommendations can be considered during GSP implementation.
20	Cathy Martin	SLO County	P. 3-5			This chapter is a key component of the Cuyama Basin	Consider revising sentence for clarity - "This chapter is a key component of the Cuyama Basin Groundwater Sustainability Agency's (CBGSA's) Groundwater Sustainability Plan (GSP), as other GSP components must be developed to set quantitative thresholds on monitoring points that indicate where Undesirable Results might occur on the monitoring network, and to shape the monitoring network to detect Undesirable Results. "	Text has been revised for clarity.
21	Cathy Martin	SLO County	P. 3-9			By setting minimum thresholds on shallow...	Please clarify sentence, slightly confusing - "By setting minimum thresholds on shallow groundwater wells near surface water, this gradient is managed, and in turn, depletions of interconnected surface water are managed."	Text has been revised for clarity.
22	Cathy Martin	SLO County	P. 3-9			Increased depletions could result in...	Consider adding a figure to help explain and clarify this sentence - "Increased depletions could result in lowering of groundwater elevations in shallow aquifers near surface water courses, which changes the hydraulic gradient between the water surface elevation in the surface water course and the groundwater elevation, resulting in an increase in depletion."	Text has been revised for clarity.
23	Cathy Martin	SLO County	P. 3-10			Using the method identified above...	Consider revising this section in this GSP or adding language as an option to be revisited in the DWR interim update in 2025 with an updated numerical model. This undesirable results should be modeled with different percentages (such as 20%, 25%, and 30%) in different basin areas and scenarios (such as drought) with projected groundwater recovery time.	Undesirable results determinations are made using monitoring data, not with the numerical model. The Basin-wide 30% criteria was confirmed by the CBGSA Board
24	Cathy Martin	SLO County	P. 3-11			Chapter 5 discussed how minimum...	Please clarify sentence	Text has been revised for clarity.
25	Cathy Martin	SLO County	P. 3-11			The Undesirable Result for land subsidence...	Consider adding how many sites are in the Basin.	This is already included.
26	Sandi Matsumoto	The Nature Conservancy	P. 3-6 and 3-10				[Checklist items #26-42]: • Identification of Undesirable Results – significant adverse impacts to GDEs can occur if 30% of representative monitoring wells fall below their minimum groundwater elevation thresholds for two consecutive years. The proposed approach could work if management areas were established to "identify different minimum thresholds, measurable objectives, monitoring, or projects and management actions based on differences in water use sector, water source type, geology, aquifer characteristics, or other factors" [23 CCR §351(r)]. But, as it is written now, significant and unreasonable adverse impacts to GDEs could occur if the exceedance of minimum thresholds disproportionately occurs in representative monitoring wells close to GDEs (e.g., 3 out of the 60 wells minimum thresholds are exceeded for 3 years are causing adverse impacts to GDEs, but because the definition of undesirable results (18 out of 60 wells) is not met, there is no formal recognition that undesirable results are occurring). We recommend that groundwater levels that are protective of GDEs be considered when establishing minimum thresholds for groundwater levels across the basin. Please refer to Step 2 of GDEs under SGMA: Guidance for Preparing GSPs for more details.	The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board.
27	Sandi Matsumoto	The Nature Conservancy	P. 3-9				[Checklist items #26-42]: •Under the Potential Effects of Undesirable Results subsection, "If depletions of interconnected surface water were to reach Undesirable Results, groundwater dependent ecosystems could be affected" should also include potential effects on environmental surface water users, land uses (e.g., fishing/hunting, hiking, boating), and property interests (e.g., privately and publicly protected conservation lands and open spaces, including wildlife refuges, parks, and natural preserves) [23 CCR §354.26(b)(3)]. Please also provide more details on how these various beneficial users could be adversely affected. SGMA also requires that depletions of interconnected surface water also consider adverse impacts on beneficial uses of surface water [23 CCR 354.28(6)].	The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board using the information that is currently available. They can be revised in the future if additional information is developed.
28	Sandi Matsumoto	The Nature Conservancy	P. 3-9				• In addition to identifying GDEs in the basin, The Nature Conservancy recommends identifying beneficial users of surface water, which include environmental users. This is a critical step, as it is impossible to define "significant and unreasonable adverse impacts" without knowing what is being impacted, nor is possible to monitor ISWs in a way that can "identify adverse impacts on beneficial uses of surface water" [23 CCR §354.34(c)(6)(D)]. For your convenience, we've provided a list of freshwater species within the boundary of the Cuyama Basin in Attachment C. Our hope is that this information will help your GSA better evaluate and monitor the impacts of groundwater management on environmental beneficial users of surface water. We recommend that after identifying which freshwater species exist in your basin, especially federal and state listed species, that you contact staff at the Department of Fish and Wildlife (DFW), United States Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Services (NMFS) to obtain their input on the groundwater and surface water needs of the organisms on the freshwater species list, and how best to monitor them. Because effects to plants and animals are difficult and sometimes impossible to reverse, we recommend erring on the side of caution to preserve sufficient groundwater conditions to sustain GDEs and ISWs.	The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board using the information that is currently available. They can be revised in the future if additional information is developed.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 3
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
29	Sandi Matsumoto	The Nature Conservancy	P. 3-9				<ul style="list-style-type: none"> Please also provide more details on when, where, and how groundwater changes can adversely affect these various beneficial users. Are there particular species, with legal protection, that already have known thresholds that need special consideration? The more specific the definition of what an adverse impact to beneficial users of groundwater and surface water looks like, the easier it is to quantify minimum thresholds, measurable objectives, and interim milestones that are protective of that definition. 	The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board using the information that is currently available. They can be revised in the future if additional information is developed.
30	Sandi Matsumoto	The Nature Conservancy	P. 3-11				<p>[Checklist items #26-42]:</p> <ul style="list-style-type: none"> There is a typo, Section 3.1.6 is actually intended to reference Section 3.2.6. 	The text has been corrected.
31	Sandi Matsumoto	The Nature Conservancy	P. 3-11				<ul style="list-style-type: none"> Please be more specific on what measurements were used to show that groundwater gradients along interconnected surface water bodies in the Cuyama basin are not in an undesirable condition. How were these gradients determined? 	The current definition reflects the best understanding given currently available data. The undesirable results definitions for depletion of interconnected surface can be updated when better data is available.
32	Sandi Matsumoto	The Nature Conservancy	P. 3-11				<ul style="list-style-type: none"> Analysis of Interconnected Surface Waters in Section 2.2.8, particularly Table 2.2, demonstrate that depletions of interconnected surface water are occurring, meaning that adverse impacts to beneficial uses and users could be occurring. Thus, it is inadequate to state that "depletion of interconnected surface water is not identified to be in an undesirable condition" without evaluating potential effects to beneficial users. 	The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board using the information that is currently available. They can be revised in the future if additional information is developed.
33	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Appendix A			TABLE: Cuyama Basin Groundwater Sustainability	<p>The first Undesirable Result listed in the first row of the first column of the table Framework for Developing Sustainable Management Criteria, is adverse impacts to the viability of agriculture and the agricultural economy.</p> <p>If that is Undesirable Result #1 as indicated, then pumping reduction recommendations must be conservative with respect to their potential impact to the agricultural economy, especially in the first few years, until enough data can be collected and analyzed to determine whether or not modeled water level declines are overpredicted, underpredicted, or something in between.</p> <p>The potential effects of uncertainty on predicted groundwater elevations and storage depletion should be acknowledged and clearly presented, and predicted values of water levels and groundwater storage volumes should be presented as ranges of likely outcomes rather than single values, or time series.</p>	The pumping reduction schedule was determined by the CBGSA Board. Uncertainty information is presented in Chapter 2 and in the modeling appendix.
34	Brenton Kelly	Quail Springs Permaculture	Appendix A			Framework for Developing Sustainable Management Criteria	<p>The framework seems to suggest that the conditions in 2015 were considered the in setting of thresholds, yet most MT are below that and some MO are lower than 2015. Question: How were the conditions in 2015 considered? And is it acceptable to not plan on ever recovering to those conditions?</p>	The MTs developed by the CBGSA Board were defined relative to 2015 groundwater elevations. SGMA does not require that groundwater elevations are returned to 2015 levels.
35	Jane Wooster		P. 3-9, Section 3.2.6			Potential causes of undesirable results for depletions of interconnected surface water...	<p>What leads you to believe this? For the most part groundwater production has not occurred in the shallowest zones. Furthermore, you imply the connection of surface water and groundwater occurs only in shallow zones which I would question.</p>	The text has been revised.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 4
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
1	Meg Brown						Monitoring system: The Plan could be improved by recognizing that the wells selected for the monitoring system are not necessarily representative. Over time, and with more data, hopefully the Plan will improve the selection of wells that are truly representative. Moreover, it is more logical to have a monitoring system specifically for the Central Basin, separate from the other management areas, since this is the most critical part of the whole Basin.	The monitoring network will be reviewed during GSP implementation to confirm the inclusion of wells recommended in the plan and to add additional wells to close data gaps.
2	Matt Young	SBCWA	4.8				This section should better explain for the reader what is meant by the term "causal nexus" and why there is causal nexus between salinity and GSA actions. If arsenic is primarily found at depth, and maintaining water levels is the primary management responsibility of the GSA, it would appear that there is a causal nexus between arsenic and GSA actions.	The text has been revised.
3	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 4-13, 4-15, 4-17, etc.			Headers describing agencies contributing data	Suggest spell out headers for general public readability such as done for header on p. 4-6: ("DWR, Statewide Dataset/California Statewide Groundwater Elevation Monitoring (CASGEM)").	This correction has been made.
4	Brenton Kelly	Quail Springs Permaculture	General				Suggestion: All water wells designated as "monitoring wells" should be thoroughly canvassed and characterized and that data should be in the DMS.	This can be considered as an augmentation to the DMS in the future.
5	Brenton Kelly	Quail Springs Permaculture	P. V.			Acronyms	Addition: OPTI DMS	DMS has been added.
6	Brenton Kelly	Quail Springs Permaculture	P. 4.2 and 4.3			4.1.1 Well-Related Terms...	Suggestion: It would be helpful to list the terms in alphabetical order	This correction has been made.
7	Brenton Kelly	Quail Springs Permaculture	P. 4.21 Sec. 4.3			Private landowners in the Basin...	Question: Who measures the "private" wells and what methods and QC/QA protocols are used?	This data was provided by private landowners in the Basin. While QA/QC protocols were not provided for past monitoring, they will be specified for future monitoring during GSP implementation.
8	Brenton Kelly	Quail Springs Permaculture	P. 4.23 Sec. 4.3.2			Many of the data sources used to compile and create the Cuyama...	Addition: There should be a OPTI – State Well Number (SWN) searchable cross reference in the DMS	This can be considered as an augmentation to the DMS in the future.
9	Brenton Kelly	Quail Springs Permaculture	P. 4.24 and 4.25, P. 4.30 and 4.31 Sec. 4.3.3			Groundwater Quality Monitoring:	Addition: The VCWPD Groundwater Quality Monitoring sites should be distinguished between "active" and "historical"	Specific information about which sites are active is not available.
10	Brenton Kelly	Quail Springs Permaculture	P. 4.44 to 4.47 Table 4.5			Wells included in the Groundwater Levels and Storage Monitoring Network	Addition: This table should have SWN's and should distinguish if it is "representative" or "supplemental".	This is not necessary as the representative wells are identified in Chapter 5.
11	Brenton Kelly	Quail Springs Permaculture	P. 4.49 Sec. 4.5.7 & Sec. 4.5.8			As of Draft GSP publication...	Comment: Along with proper canvassing, no thorough effort was made to acquire and input construction information on all representative wells, which can be obtained from owners, permitting agency, CDWR, the driller – or manual sounding for depth. Suggestion: This investigative canvassing and data entry needs to be completed early on during implementation. Question: What happened to the TSS grant for new depth dependent monitoring wells & Stream gauge flow meters and down hole video logging? This was supposed to have happened over a year ago.	This can be considered during GSP implementation.
12	Brenton Kelly	Quail Springs Permaculture	P. 4.52 Sec. 4.8			Furthermore, unlike with salinity, there is no evidence ...	Comment: I disagree with this statement about arsenic. Overpumping the aquifer can induce arsenic laden "ancient" water to migrate into the cone of depression. Change: The second instance of the word "salinity", in this sentence should be changed to "nitrates" or "Boron" or almost anything else that is being ignored.	The sentence has been corrected.
13	Brenton Kelly	Quail Springs Permaculture	P. 4.52 Sec. 4.8			Degraded Groundwater Quality Monitoring Network:	Addition: The GSP should define a "schedule" of constituents to be sampled annually or periodically.	This will be developed during GSP implementation.
14	Brenton Kelly	Quail Springs Permaculture	P. 4.52 Sec. 4.8			Degraded Groundwater Quality Monitoring Network:	Comment: The "background" TDS in the Cuyama drainage is very high, thus on its own does not serve as an ample signal for Groundwater Quality trends. Addition: In order to monitor Groundwater Quality this GSP must sample more than just TDS.	Comment noted.
15	Brenton Kelly	Quail Springs Permaculture	P. 4.55 to 4.57 Table 4-7			Wells Included in the Groundwater Quality Monitoring Network:	Addition: This Table should cross reference OPTI to SWN	This cannot be easily accomplished with the table format. The SWN numbers can be easily found in OPTI
16	Brenton Kelly	Quail Springs Permaculture	P. 4.60 Sec. 4.8.8			Well construction for existing salinity sampling efforts ...	Question: What good is it to pull Water Quality samples from unknown depths? Addition: Collect and input this data into the DMS and Model early on in Implementation.	This can be considered during GSP implementation.
17	Brenton Kelly	Quail Springs Permaculture	P. 4.62 Sec. 4.8.9			Plan to Fill Data Gaps:	Addition: For the sake of greater Basin understanding this GSP needs to monitor for more than just TDS.	Comment noted.
18	Brenton Kelly	Quail Springs Permaculture	P. 4.68 Sec. 4.10			The minimum threshold established for depletions of interconnected...	Comment: There are no stream gauges on the Cuyama inside the basin, no shallow wells near the river or piezometers to monitor GDEs. This GSP does not adequately identify or quantify the depletions of interconnected surface waters. Question: How can you quantify what you have not located and have no way to measure? Addition: This GSP needs a description of whether hydrological data are spatially and temporally sufficient to monitor groundwater conditions for each GDE unit. Also needed is a description of how impacts to GDEs and environmental surface water users, will be monitored and which monitoring methods will be used in conjunction with hydrologic data to evaluate cause-and-effect relationships with groundwater conditions.	The section on GDEs in Chapter 2 has been updated to note that piezometers are needed to monitor GDEs.
19	Cathy Martin	SLO County	P. 4-15			SLOCFC&WCD also reports these	Grammar	The text has been corrected.
20	Sandi Matsumoto	The Nature Conservancy	P. 4-42 & 4-43				[Checklist items #43-45]: •Please identify which representative monitoring wells are capable of monitoring groundwater level conditions that can impact environmental beneficial users of groundwater (i.e., GDEs) and of surface water (e.g., freshwater aquatic species). Refer to Best Practice #4 in Attachment D to this letter for technical guidance.	This can be considered during GSP implementation.

Cuyama Basin Sustainability Section
 Summary of Public Comments and Responses - Chapter 4
 June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
21	Sandi Matsumoto	The Nature Conservancy	P. 4-10				<ul style="list-style-type: none"> •The improvement of numerical model accuracy for the estimation of interconnected surface waters should also include the installation of clustered or nested wells and the installation of shallow monitoring wells around GDEs and the Cuyama River to resolve data gaps that were identified in Section 2.2.10: oThe Cuyama River is not gaged inside the Cuyama Basin, so flows of the river in the Basin have been estimated based on measurements at downstream gages. oVertical gradients in the majority of the Basin are not understood due to the lack of wells with completions of different depths located near each other. oGDEs could be evaluated in greater detail oInformation about many of the wells in the Basin is incomplete, and additional information is needed regarding well depths, perforation intervals and current status. oDue to sporadic monitoring by a variety of monitoring entities, a long period of record of monitoring groundwater levels does not exist in many areas in the Basin. 	Additional information will be developed as the monitoring network is developed during GSP implementation.
22	Sandi Matsumoto	The Nature Conservancy	P. 4-10				<ul style="list-style-type: none"> •Please identify appropriate biological indicators that can be used to monitor potential impacts to environmental beneficial users due to groundwater conditions. Refer to Appendix E of this letter for an overview of a free, new online tool for monitoring the health of GDEs over time. 	This can be considered during GSP implementation.
23	Jane Wooster		Figure 4-3				This map shows certain wells monitored for which DWR has no access. Interesting. Is data from other agencies sent to DWR for this dataset?	Yes, the DWR database includes data provided to DWR from other agencies and private landowners.
24	Jane Wooster		Page 4-28		Number of measurement sites	This # refers to CCSD water quality data measurements. At 1.2.4 you state that "local agencies such as CCSD ... do not conduct routine monitoring" yet you can see they test every 6 months it would seem.	The sentence in 1.2.4 has been removed.	
25	Jane Wooster		4.3.5		Surface water monitoring	P. 2-125 states flows of the river have been based on measurements at downstream gages, then at Appendix C-7 gauge ID 11136800 is cited. Gere 4.3.5 admits this gauge receives non-basin water in addition to basin water.	It is noted in Appendix C that the flows on this gage were adjusted to estimate flows at the downstream boundary of the basin.	
26	Sue Blackshear		4.8			For whatever reason, the water quality in the Cuyama Basin is poor. Perhaps connected with the years of severe overdraft. The GSP is only required to deal with the problem of salinity. I would like to suggest that the GSA be required to coordinate with the agency responsible for other issues of water quality to help solve the real problem of water quality for the local residents. State support for this would be very beneficial.	Comment noted.	

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 5
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
1	15 Landowners/Residents	Cottonwood Canyon Landowners and Residents	5.2.2 (p. 5-8)			"Monitoring in this threshold region indicates"	We agree with establishing the Western Region as separate from the Northwest Region and establishing a Minimum Threshold for representative wells "to protect the water levels from declining significantly, while allowing beneficial and surface uses of the groundwater and protection of current well infrastructure." We especially appreciate the concern shown to monitor and protect our wells in relation to the major change in water use over the past three years in what is identified as the Northwest Region.	Comment noted.
2	15 Landowners/Residents	Cottonwood Canyon Landowners and Residents	Figure 5.1				This map shows that 10 representative wells have been selected for the Western Region. We are concerned that only 3 if the 10 representative wells are in Cottonwood Canyon, especially since the GSP says "levels varied significantly depending on where representative wells were in the region" (p. 5-8). Cottonwood Canyon is where most of the domestic dwellings and full-time residents live in this region. Of the 3 wells in Cottonwood Canyon, 2 are directly on Cottonwood Creek. These two wells will be impacted by the year-round flow. We suggest that one of the two more wells from Cottonwood Canyon be added to the representative wells that can represent the variation of groundwater flow in the Western Region. Santa Barbara County has been monitoring several more wells in Cottonwood Canyon that could be added to the database.	Additional wells can be considered during GSP implementation.
3	15 Landowners/Residents	Cottonwood Canyon Landowners and Residents	Table 5-1 (p. 5-13)				Shows the Minimum Thresholds, Measurable Objectives, and Interim Milestones for each of the wells in the Monitoring Network. The 3 wells identified in the Cottonwood Canyon area, all have Minimum Thresholds (MT) that are lower than the current groundwater level by 10-60 feet. (#117 MT is 10 feet below the current groundwater level; #118 is over 60 feet below current groundwater level; #571 is over 20 below current groundwater level). Our wells have held steady through over five years of drought. We don't think that by having a MT that will allow water levels to decrease will protect our wells. We are especially concerned that the Interim Milestones are set over the next 15 years at the level of the MT> This means the goal for the representative wells in the Western Region and specifically Cottonwood Canyon is to have our well levels go down. We suggest instead, the Measurable Objective, which is set at actual current groundwater levels, be used for the Interim Milestones in our region.	Interim Milestones have been revised per Board direction.
4	Sue Blackshear						The minimum threshold established by the GSP: The minimum thresholds as established by the GSP are based on the groundwater levels as existed in 2015. Over more than 50 years before 2015, various studies have shown that the groundwater usage had exceeded the amount recovered each year. So the groundwater level in 2015 was already extremely over-drafted. I understand that the various studies did not include data from a number of properties because some property owners or leasers would not share that information. Nevertheless, basing the minimum thresholds on 2015 data means that by 2020, "sustainability" would be groundwater levels no better than in the year 2015--extremely over-drafted.	The minimum thresholds reflect those approved by the GSA Board.
5	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 5-7			Eastern Threshold Region: "The MT	Explain rationale why MTs in the Eastern TR were set 35% below 2015 water levels, but MTs in the Central TR were set 20% below 2015 water levels.	A sentence has been added to the Eastern Region section
6	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 5-7, 5-8			Central TR: "For Opti Wells 74, 103, 114, 568, 609, and 615, a modified... Western TR: "Opti Well 474 ...and include Opti Wells 830, 831, 832, 833, 834, 835, and 836.	Explain rationale for why the method of sustainability criteria calculation was modified for these particular wells.	The text has been updated to provide additional clarification on these wells.
7	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 5-9				Suggest compiling a summary table of MO, MT, and IM methods and rationales by Threshold Region for comparison and discussion.	This was presented during the GSA Board meeting where the rationales were discussed.
8	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 5-11 Table 5-1				Screen bottom for Opti well 72 not consistent with information in other tables.	The table has been corrected.
9	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 5-18			...the MT [for TDS] for representative	Using a threshold value for TDS at the 90th percentile of the historical range could quickly become problematic, especially in wells with increasing TDS trend. Most wells are >90% of their threshold (MT) value, and almost all wells are above their MO. Suggest using a method similar to that used for water level MTs, where generally a constant was subtracted (added in the case of WQ MTs) from the minimum (or the 2015 data). Do the WL and TDS values correlate? Are WLs a potential proxy for TDS in certain Threshold Regions?	The Board can consider adjusting MT levels in the future if conditions warrant it.
10	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 5-23			Subsidence is expected to be	Subsidence in most cases is permanent and irreversible. Setting the MO to zero overly constrains the basin. Some subsidence can be tolerated without noticeable effects - a few inches over 20 years should not be considered significant and unreasonable. There are many faults in the basin, and tectonic forces are very active in the region. How will the GSA separate measured changes in ground surface into SGMA-related subsidence versus movement due to faulting?	The Board can consider adjusting MT levels in the future if conditions warrant it.
11	Brenton Kelly	Quail Springs Permaculture	General Comment			the Basin's representative sites will also have IMs...	Comment: No IM calculations were made for any representative wells. All IM are simply set the same as the MT. As a result, IMs will in no way help to measure progress toward sustainability over the GSP's planning horizon. The MOs & IMs have no actionable significance in this Plan? The SAC and GSA never discussed this being the goal. Question: Who decided the goal was only to minimizing the exceedance of MTs between now and 2040, and who chose not to move toward the MOs or any Sustainability Goal greater than the MTs? Addition: Set IM at 33% intervals in the MoOF for a goal of the MO. That would seem to be DWRs intent.	The IMs have been adjusted based on Board direction.
12	Brenton Kelly	Quail Springs Permaculture	P. 5.1 Sec. 5.1			Useful Terms	Comment: Please list these terms alphabetically	This change has been made.
13	Brenton Kelly	Quail Springs Permaculture	P. 5-6 Sec. 5.2.2			The MT was calculated by taking...	Comment: Conditions in 2015 may have somehow been considered but in the case of the Central Region and the Eastern Region they were overlooked and forgotten. 20 to 35% of range below 2015 for MTs. The Western and Northwestern did not use 2015 for calculating any thresholds at all. Question: How did DWR expect 2015 conditions to be considered, as a baseline for sustainability or just a benchmark to measure down from?	The document reflects direction provided by the GSA Board.
14	Brenton Kelly	Quail Springs Permaculture	P. 5-8			Monitoring in this threshold region indicates levels ...	Comment: Groundwater level declines were noted with in two years of establishing the new agriculture in the area (North Fork Vineyard), yet the MT was set to allow the water levels to continue declining significantly. The criteria for the MTs in this region was suggested by property owner's unproven science for determining the region's total average saturated thickness for the primary storage area. That is speculation not science. QC/QA Question: Given the unproven geology of this region, how was this done? By who? And why would that be a defensible justification for lowering groundwater levels in a critically overdrafted basin? By what QC/QA was this determination established?	The document reflects direction provided by the GSA Board.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 5
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
15	Brenton Kelly	Quail Springs Permaculture	P. 5-15 Sec. 5.5			degraded water quality is a result stemming ...	Comment: There are several undesirable results stemming from a causal nexus between groundwater pumping & water quality. Not just TDS. Suggestion: Monitor & track changes in other constituents like Arsenic, Nitrites, Boron and Ions to better understand recharge rates and sources. Question: Can the GSP monitor various constituents without having to set MTs?	The document reflects direction provided by the GSA Board.
16	Brenton Kelly	Quail Springs Permaculture	P. 5-16			In the case of arsenic, all of the high concentration measurements ...	Comment: This is within the range of pumping and the recharge is horizontal flow coming in from adjacent ancient water high in these constituents of concern. More than 30% of the MN wells pump from below 700'. (See Table 5.2 on P. 5.19) Suggestion: Monitor for a wider spectrum of constituents including arsenic, for Water Quality such as was used in CDWRs GAMA program for improving our understanding of recharge rates and sources.	The document reflects direction provided by the GSA Board.
17	Brenton Kelly	Quail Springs Permaculture	P. 5-18 Sec. 5.5.3			It should be noted however, that TDS levels in...	Comment: Many of the crops grown in the Basin, including carrots, are adversely affected by the kinds of salts in the Cuyama Basin, resulting in lower yields of lower quality carrots and other row crops, or else acidification inputs are necessary. Undrinkable water adversely affects domestic and livestock uses. The agricultural economy is not the only factor to consider. Delete: This editorializing is not factual or necessary and should be deleted.	The sentence has been revised to be less definitive.
18	Brenton Kelly	Quail Springs Permaculture	P. 5-22 Sec. 5.6.3			Because current subsidence rates (approximately ...	Comment: With only one monitoring site on the edge of the central problem area, very little is known about basin wide subsidence issues or their effect on ground water storage. Suggestion: Please justify the 2 inches MT better and prioritize filling the data gap.	The Board can consider adjusting MT levels in the future if conditions warrant it. The data gap is identified in Chapter 4.
19	Brenton Kelly	Quail Springs Permaculture	P. 5.23 Sec. 5.6.2			storage losses are small enough they may be considered superficial.	Comment: Compressed clays and collapsed alluvium may in fact significantly decrease "deep percolation" through the 600' of dry vadose zone. Question: Please justify how you can consider these consequences are superficial?	Text has been revised.
20	Brenton Kelly	Quail Springs Permaculture	P. 5-26			Conditions have not changed since January 1, 2015, and surface flows	Comment: It may be true that the Cuyama River is as dry as it was in 2015, but infiltration into a 600' thick vadose zone is questionably available for use by local phreatophytes. Suggestion: Address the effects of that much dry alluvium on recharge and deep percolation. The GSP can not overlook the vadose zone in this basin of complex cascading hydrogeology.	This can potentially be evaluated further in the future.
21	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 9			Recent historical data and hydrographs in this portion	Comment: This statement appears to be based on data provided by the landowner of this parcel. This data has not been peer reviewed or verified by any other source. Without qualified, third-party review by an entity that does not have a conflict of interest in the production of this data, the "recent historical data and hydrographs" cited cannot be considered unprejudiced scientific evidence and should not be the basis of the statement that this portion of the Basin is "likely currently in a full condition". Recommendation: Delete this statement, or amend to read "Recent historical data and hydrographs in this portion of the Basin indicate suggest that this portion is may currently be in a full condition. The CBGSA will conduct a third-party review of this data to verify this assumption."	A comparison of private landowner and DWR/USGS data is shown in Chapter 2 that demonstrates consistency between them.
22	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 10, 11, 12, 13			IMs were set to equal the MT in all incremental years between 2020 and 2040. This reflects a policy goal of minimizing the exceedance of MTs between now and 2040. As a result, IMs will be a way to measure progress toward sustainability over the GSP's planning horizon.	Comment: This paragraph appears in 5 of the 6 descriptions of Threshold Regions, as rationales for setting MTs, MOs and IMs. This policy was not discussed or vetted by the CBGSA and no logical or scientific support for this policy was presented to the CBGSA, nor is such evidence included in the Draft CBGSP. As described in this text and as seen in table 5- 1, the IMs set for every monitoring well make no attempt to approach the MO previously set for each well and appear to dismiss the notion of Measurable Objectives completely. If this policy is adopted, why were Measurable Objectives set for any region at all? Per SGMA regulations, this policy is unacceptable and must be changed or substantiated with verifiable science. The Final GSP Emergency Regulations state: "355.4 When evaluating whether a Plan is likely to achieve the sustainability goal for the basin, the Department shall consider the following: (1) Whether the assumptions, criteria, findings, and objectives, including the sustainability goal, undesirable results, minimum thresholds, measurable objectives, and interim milestones are reasonable and supported by the best available information and best available science." Source: Final GSP Emergency Regulations, Section 355.4 (1) Recommendation: Present a review of this policy decision, supported by science, to the CBGSA, as well as an analysis of the impact this policy will have on reaching Measurable Objectives and the sustainability goal for the Basin. Change: Missing word in last sentence: "be"	Interim Milestones have been revised per Board direction.
23	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 18-19 Table 5-1				Correction: The identification of a "Far-West Northwestern region" has not been adopted by a vote of the CBGSA and does not appear on any maps. The locations of these wells is not indicated anywhere else in the GSP. Please correct.	They are described as such in the text on page 5-8 and were discussed in this way at the Board meeting.
24	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 19 Section 5.3	2		Direct measurement of the reduction of groundwater storage in the Basin is not needed because monitoring in several areas of the Basin (i.e., the western, eastern, and portions of the north facing slope of the Cuyama Valley near the center of the Basin) indicate that those regions are likely near, or at full conditions	Question: Please clarify the location of the highlighted section (portions of the north facing slope of the Cuyama Valley near the center of the Basin) referred to as "portions of the north facing slope of the Cuyama Valley near the center of the Basin". This seems to contradict the data that indicates that the center of the Basin is not "likely near, or at full conditions."	The text says areas "near the center of the Basin", not in the center of the Basin

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 5
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
25	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 19 Section 5.5	1		The undesirable result for degraded water quality is a result stemming from a causal ...	Comment: This is not an accurate statement. The CBGSA did not vote to only consider "the undesirable result for degraded water quality is a result stemming from a causal nexus between SGMA-related groundwater quantity management activities." No such vote was proposed or taken. This is an assumption made by the plan consultant. SGMA regulations do not stipulate a "causal nexus" argument for establishing undesirable results for degraded water quality. Further, the Final GSP Emergency Regulations state: "354.28. Minimum Thresholds (c)(4) In setting minimum thresholds for degraded water quality, the Agency shall consider local, state, and federal water quality standards applicable to the basin." Nowhere in the 354.28 subsection are GSAs permitted to determine and solely address water quality conditions that the CBGSA deems to have a so-called "causal nexus" with groundwater pumping. Further, a recent Stanford University study recently established a causal nexus between overpumping and arsenic levels in groundwater, which refutes the opposite claim in the Draft CBGSP. Recommendation: Without further data, monitoring, and a basis in scientific evidence, the CBGSA should not rule out setting undesirable results, MTs, MOs and IMs for all constituents that impact water quality in the Basin, in particular arsenic. Further, per the Final GSP Emergency Regulations, the CBGSA must "consider local, state, and federal water quality standards applicable to the basin" when determining the Undesirable Results, MOs, MTs and IMs relative to water quality throughout the Basin. Please provide proof that "local, state, and federal water quality standards" have been considered in the CBGSP's plan to prevent Undesirable Results for the Sustainability Indicator Degraded Water Quality. Please provide scientific, peer-reviewed evidence for the inclusion or exclusion of any constituent in the CBGSP's plan to prevent Undesirable Results for the Sustainability Indicator Degraded Water Quality.	The current plan for water quality in the GSP satisfies DWR requirements. This can be changed if direction is provided by the GSA Board.
26	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 19-20 Section 5.5			The SGMA regulations specify that, "minimum thresholds for degraded...	Comment: This section offers an incomplete quotation of the relevant statute. The full subsection reads: "354.28 (c)(4) Degraded Water Quality. The minimum threshold for degraded water quality shall be the degradation of water quality, including the migration of contaminant plumes that impair water supplies or other indicator of water quality as determined by the Agency that may lead to undesirable results. The minimum threshold shall be based on the number of supply wells, a volume of water, or a location of an isocontour that exceeds concentrations of constituents determined by the Agency to be of concern for the basin. <i>In setting minimum thresholds for degraded water quality, the Agency shall consider local, state, and federal water quality standards applicable to the basin.</i> " (highlight added) In the Cuyama Basin, arsenic has long been an issue, so much so that the CCSD maintains an arsenic treatment plant to reach safe levels for arsenic for drinking water. The argument that there is no "causal nexus" between groundwater pumping and arsenic levels in the aquifer is not grounded in data or science. The Central Coast Regional Water Quality Control Board recommended that the GSP monitor for TDS, nitrates, arsenic and major dissolved ions, the latter to facilitate accurate readings. Recommendation: Follow the Central Coast Regional Water Quality Control Board's recommendations for constituents that should be included in determining and preventing undesirable results for the Cuyama Basin.	The current plan for water quality in the GSP satisfies DWR requirements. This can be changed if direction is provided by the GSA Board.
27	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 19 Section 5.5.3			It should be noted however, that TDS levels in groundwater do not...	Comment: The GSP will govern groundwater use in the Cuyama Basin for the next 20 years, and possibly beyond. Due to water allocations and the potential for changes in crop patterns, this sentence may not be relevant in future years. Additionally, as SGMA requires that all beneficial users and uses are considered in determining and preventing undesirable results, the effect that TDS levels have on current crops and agricultural interests is not the only impact that should be considered. TDS levels affect domestic wells, drinking water and Groundwater Dependent Ecosystems. Recommendation: Strike this sentence or include a scientific analysis that observes the impact of TDS levels on all beneficial users and uses.	The sentence has been revised to be less definitive.
28	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 22, 5.5.3			GSP regulations require GSAs to avoid undesirable results by 2040...	Comment: This statement is misleading and suggests that "meeting or exceeding the MT is required by SGMA" but that reaching a Measureable Objective is not also required by SGMA. This is not the case. The regulations state the following: "Measurable objectives shall be established for each sustainability indicator, based on quantitative values using the same metrics and monitoring sites as are used to define the minimum thresholds." (Source: Final GSP Emergency Regulations 354.30) Therefore, by definition, measurable objectives are distinct from minimum thresholds; minimum thresholds are to be avoided and measurable objectives are to be reached, through the application of interim milestones. Nowhere in the regulations does it state that interim milestones can be set as the same value as minimum thresholds. In fact, interim milestones must be set to demonstrate that a GSP includes a plan to achieve measurable objectives. Further, the Final GSP Emergency Regulations state that monitoring networks must "Demonstrate progress toward achieving measurable objectives described in the Plan." (354.34 (b)(1) How can the CBGSP demonstrate "progress toward achieving measurable objectives" if minimum thresholds and interim milestones to reach measurable objectives are considered one in the same? The regulations also state that the DWR will consider the following in evaluating the GSP: "(1) Whether the assumptions, criteria, findings, and objectives, including the sustainability goal, undesirable results, minimum thresholds, measurable objectives, and interim milestones are reasonable and supported by the best available information and best available science." It seems unlikely that the DWR will conclude that completely ignoring measurable objectives and equating minimum thresholds with interim milestones is supported by "the best available information and best available science." (Final GSP Emergency Regulations 355.4. Criteria for Plan Evaluation)	The IMs have been adjusted based on Board direction.
29	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 27 & 28			Because current subsidence rates (approximately 0.8 inches per year)...	Comment: By setting the minimum threshold for subsidence across the Basin at 2 inches per year, and by not setting interim milestones to reach a measurable objective of zero, the CBGSP is not complying with SGMA regulations. No plan is identified that will actually bring the subsidence level to zero. Further, by setting the MT at 2 inches per year, as written, the CBGSP could potentially allow 40 inches of land subsidence by 2040, without consequence. Recommendation: Reduce the MT for subsidence to one inch per year, and set interim milestones to reach zero subsidence by 2040 as required by SGMA.	The Board can consider adjusting MT levels in the future if conditions warrant it.
30	Roberta Jaffe and Stephen Gliessman		General Comment			Interim Milestones	SGMA regulations state as follows: § 354.30. Measurable Objectives (e) Each Plan shall describe a reasonable path to achieve the sustainability goal for the basin within 20 years of Plan implementation, <i>including a description of interim milestones for each relevant sustainability indicator, using the same metric as the measurable objective</i> , in increments of five years. The description shall explain how the Plan is likely to maintain sustainable groundwater management over the planning and implementation horizon. Comment: Throughout Chapter 5 Minimum Threshold is used for Interim Milestones. Measurable Objectives are not incorporated at all for any of the sustainability goals even when the MT brings the indicator lower than its current status. The goal is not just to stop lowering the water levels, but to bring them back up to the measurable objective. Furthermore, if the IMs are set to the MTs, the plan does not provide a safety net for the Basin in times of drought. Recommendation: Set interim milestones to incorporate Measurable Objectives.	The IMs have been adjusted based on Board direction.
31	Roberta Jaffe and Stephen Gliessman		General Comment			Sustainability Goals, Sustainable Yield	§ 354.24 Sustainability Goal: The Plan shall include a description of the sustainability goal, including information from the basin setting used to establish the sustainability goal, <i>a discussion of the measures that will be implemented to ensure that the basin will be operated within its sustainable yield</i> , and an explanation of how the sustainability goal is likely to be achieved within 20 years of Plan implementation and is likely to be maintained through the planning and implementation horizon. Comment: There is no correlation made in Chapter 5 between Minimum Thresholds, Measureable Objectives, Interim Milestones and how the Basin will reach it sustainable yield.	Projects and actions to achieve the Sustainability Goal are described in Chapter 7.
32	Roberta Jaffe and Stephen Gliessman		P. 5-8 Section 5.2			map of representative wells by Threshold Region	Comment: Western Region: Of the 10 representative wells identified in the Western Region, only 3 are in the main rural residential area, Cottonwood Canyon. Of the 3 in Cottonwood Canyon, 2 are located on Cottonwood Creek which benefit from year-round subsurface flow and seasonal surface flow. There are more wells in this area being monitored by Santa Barbara County that would more fully represent this area. Recommendation: Refer to Santa Barbara County Water Agency for their recommendation on wells to be monitored.	Additional wells can be considered during GSP implementation.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 5
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
33	Roberta Jaffe and Stephen Gliessman		P. 5-3			The northern boundary of this region is the narrows at the Cuyama River...	Recommendation: Since this boundary borders on federal lands, recommend this be mentioned in the description.	Text has been revised.
34	Roberta Jaffe and Stephen Gliessman		P. 5-5			This part of the Basin has agricultural pumping	Comment: During summertime when there is the greatest agricultural pumping in this region, domestic wells go dry and water has to be trucked in. Recommendation: The above should be incorporated in the description.	This is discussed in section 5.2.2
35	Roberta Jaffe and Stephen Gliessman		P. 5-9			Recent historical data and hydrographs ...	Comment: The Northwestern Region was in a full condition prior to intensive pumping began in 2016. It is now not only no longer in "full condition," but is also dropping. Recommendation: This should be clarified in the description.	Insufficient data is available to know if recent changes in groundwater elevations are temporary or reflect a long-term change.
36	Roberta Jaffe and Stephen Gliessman		P. 10 Section 5.2.2			IMs were set to equal the MT in all incremental years between 2020...	Comment: This is the same IMs used throughout the chapter. For the Eastern Region this sets the Milestones at staying near the bottom of some of the representative wells. This is not an acceptable goal for an area that includes an identified Management Area in the Basin. Recommendation: Set IMs for this region that aims to reach the Measurable Objective.	The IMs have been adjusted based on Board direction.
37	Roberta Jaffe and Stephen Gliessman		P. 11 Section 5.2.2			"IMs were set to equal the MT ...	Comment: Same IM statement was used as above. The IM here should at least be set to the glide path and include the cutbacks to start in early 2023.	The IMs have been adjusted based on Board direction.
38	Roberta Jaffe and Stephen Gliessman		P. 12 Section 5.2.2			"The MT was calculated by taking the difference between the ...	Comment: Why should this region's MT go below Feb 2018 when these wells have held steady on groundwater through 6 years of drought? The MT could be set at the 2015 levels, which was the 4th year of drought.	The document reflects direction provided by the GSA Board.
39	Roberta Jaffe and Stephen Gliessman		P. 12 Section 5.2.2			IMs were set to equal the MT in...	Comment: Interim Milestones are set over the next 15 years at the level of the MT. This means the goal for the representative wells in the Western Region is for them to go down. Recommendation: Instead we recommend using the Measurable Objective, which is set at actual current groundwater levels, be used for the Interim Milestones in this region.	The IMs have been adjusted based on Board direction.
40	Roberta Jaffe and Stephen Gliessman		P. 12 Section 5.2.2			Due to these hydrologic conditions, the MT was set to protect	Comments: in the NW region, the MT in this region allows many wells to draw down an additional 20 feet, in some cases more than an additional 100 feet. Does that mean the IM for the Northwest region is to have a target of lowering the ground level every 5 years? Recommendation: to use the Measurable Objectives for the IMs in the Northwest Region.	The document reflects direction provided by the GSA Board.
41	Roberta Jaffe and Stephen Gliessman		P. 19 Section 5.3			Direct measurement of the reduction of	Comment: This provides an inappropriate description of the Basin. The eastern area, specifically the Ventucopa area, as described in other areas of Chapter 5, has shown consistent trends toward depletion over the last 20 years. If these areas are full, then it is very likely that GDE's would be negatively impacted if the MT is set at the lower levels than they are now.	The text has been revised for clarity.
42	Roberta Jaffe and Stephen Gliessman		P. 19 Section 5.5			Salinity (measured as total dissolved solids	Comment: It is not sufficient to measure only TDS. There are multiple agencies monitoring various constituents and there is pumping taking place at greater than 700 feet. Recommendation: Incorporate and continue groundwater quality measurements from other agencies (eg. CCSD, the Counties, Central Coast Water Board) into the GSP including so that an overall assessment of groundwater quality can be done at regular intervals.	This can be considered during GSP implementation.
43	Roberta Jaffe and Stephen Gliessman		P. 5-22 Section 5.5.3			TDS does not have a primary maximum	Comment: This section proposes that the only constituent being measured be TDS and in all cases, due to its natural occurrence in the groundwater, it be allowed to exceed California Division of Drinking Water and USEPA secondary standard. Thus, since TDS is not being held to conventional standards and since no other constituents are being monitored, there is virtually no water quality sustainability goals being set in the GSP. Question: Are any of the identified wells used for drinking water or located near drinking water wells? If so, what standards should these wells be monitored for? Recommendation: Identify wells near drinking water wells and separate them out for specific monitoring.	This can be considered during GSP implementation.
44	Roberta Jaffe and Stephen Gliessman		Table 5-2. p. 5.23				Comment: Of the 63 wells listed only 4 are below the 500 mg/L for the Maximum Measurement Value. 32 (more than 50%) are above 1500 mg/L for the Maximum Measurement Value. In all cases except 1 the MT is set higher or equal to that well's Maximum Measurement Value. The 1 exception is well #703 which has the highest reading for MMV: 4500mg/L and a MT of 4096.8 Would you want your child to drink this water?	This can be changed if direction is provided by the GSA Board.
45	Roberta Jaffe and Stephen Gliessman		5.6.3			the primary influence within the Basin	Comment: Why if it's 0.8 inches now are we giving latitude to go to 2 inches? How does this translate to loss in storage? Loss of groundwater storage is not even mentioned. Yet wasn't there a significant decrease at the CVHS site? This is not mentioned in the narrative, but the graph p. 5.29 shows a drop of 300 mm (apx 1 foot) between August 99 and 2017. At earlier SAC meetings it was proposed that more monitoring sites would be installed. Recommendation: Have the MT be at the current level of 0.8 inches and install additional monitoring sites in the Basin to establish a representative reading. Provide an estimate of storage loss that occurs with a subsidence of 0.8 inches.	This can be changed if direction is provided by the GSA Board.
46	Roberta Jaffe and Stephen Gliessman		5.7			Because current Basin conditions have	Comment: The Northwest region of the Basin has shown depletion since 1/1/15 when it was at a surface groundwater level. Thus depletion in this area could impact GDEs. As represented in the groundwater level section of this chapter, the MTs for many of the representative wells in this area are set at a level that would impact GDEs thus these MTs will not "act to maintain depletions of interconnected surface water..." In addition, it was proposed during SAC and GSA meetings that peziometers would be set up to monitor GDEs, but there is no mention of this in the plan. Recommendation: If the objective is to use groundwater levels to monitor, use the Measurable Objectives for the NW region which are either at current groundwater level or below.	The section on GDEs in Chapter 2 has been updated to note that piezometers are needed to monitor GDEs.
47	Cathy Martin	SLO County	P. 5.6			This reflects a policy goal of minimizing the exceedance of MTs between now and 2040	Consider verifying this approach (Minimum Thresholds = Interim Milestones) with DWR.	The IMs have been adjusted based on Board direction.
48	Cathy Martin	SLO County	P. 5.7			This reflects a policy goal of minimizing the exceedance of MTs	Consider verifying this approach with DWR.	The IMs have been adjusted based on Board direction.
49	Cathy Martin	SLO County	P. 5.7			As a result, IMs will a way	Consider verifying this approach with DWR.	The IMs have been adjusted based on Board direction.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 5
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
50	Cathy Martin	SLO County	P. 5.7			This reflects a policy goal of minimizing the exceedance	Consider verifying this approach with DWR.	The IMs have been adjusted based on Board direction.
51	Cathy Martin	SLO County	P. 5.8			Monitoring in this threshold region indicates levels ...	As similar to the other regions text, please verify and add language if this is protective for domestic pumpers.	Text has been revised..
52	Cathy Martin	SLO County	P. 5.8			These wells have total depths that is shallower	These wells were reclassified into the Western Threshold Region MOs and MTs, but located within the Northwestern Threshold Regions; please discuss why these wells (Opti Wells 830, 831, 832, 833, 834, 835, and 836) will not be impacted by the Northwestern Threshold Region MTs and MOs.	As discussed in the monitoring networks chapter, potential impacts will be detected by the Monitoring Network so they can be addressed by the CBGSA Board
53	Cathy Martin	SLO County	P. 5.9			This reflects a policy goal of minimizing	Consider verifying this approach with DWR.	The IMs have been adjusted based on Board direction.
54	Cathy Martin	SLO County	P. 5.18			For this reason, the IMs for 2025...	Consider verifying this approach with DWR.	The IMs have been adjusted based on Board direction.
55	Cathy Martin	SLO County	P. 5.24			Subsidence rates will be measured...	Please remove extra period	This has been corrected.
56	Sandi Matsumoto	The Nature Conservancy	P. 5-6 thru 5-9				· Selecting thresholds by using groundwater elevation measurements closest to (but not before) January 1, 2015 is inadequate for identifying minimum thresholds or measurable objectives. Relying solely on the SGMA benchmark date (January 1, 2015) or any other single point in time to characterize groundwater conditions fails to capture the seasonal and interannual variability typical of California's climate. Hydrology is not static. Measurable objectives are intended to be set with enough operational flexibility to permit seasonal and interannual fluctuations that occur in California. We recommend that you consider using a baseline approach to better capture seasonality and water year types.	Using January 1, 2015 as a reference point is acceptable for development of the GSP MOs and IMs.
57	Sandi Matsumoto	The Nature Conservancy	P. 5-6 thru 5-9				· January 1, 2015 was at the height of California's historic drought, a period of time that was characterized by adverse impacts to domestic well owners (e.g., dry wells), GDEs (e.g., water stress impacts on growth, reproduction, and even mortality due to lack of groundwater), and surface water users (e.g., lower streamflows). The onus is on the GSAs to determine whether groundwater conditions (due to groundwater pumping) exacerbated impacts to these beneficial users. And if so, to recognize these impacts and establish thresholds and measurable objectives that can avoid adverse impacts to beneficial users caused by groundwater in all water year types.	Using January 1, 2015 as a reference point is acceptable for development of the GSP MOs and IMs.
58	Sandi Matsumoto	The Nature Conservancy	P. 5-6 thru 5-9				· While total well depth information is helpful in considering adverse impacts to beneficial users of groundwater (e.g., domestic, irrigation, and municipal wells), it fails to consider adverse impacts to GDEs and environmental beneficial users of surface water in interconnected surface waters. Environmental beneficial users of groundwater need to be considered when establishing measurable thresholds, measurable objectives, and interim milestones. Please refer to Step 2 of GDEs under SGMA: Guidance for Preparing GSPs1 for how this can be accomplished.	Comment noted.
59	Sandi Matsumoto	The Nature Conservancy	P. 5-6 thru 5-9				· Please describe any differences between the selected minimum threshold and state, federal, or local standards relevant to the species or habitats residing in GDEs, as required [23 CCR §354.28 (b)(5)].	No differences have been identified.
60	Sandi Matsumoto	The Nature Conservancy	P. 5-27				· It is highly doubtful that January 1, 2015 surface water conditions can be considered "normal" (2nd sentence in 2nd paragraph), please provide data to back this claim. January 1, 2015 was at the height of California's historic drought, a period of time that was characterized by adverse impacts to domestic well owners (e.g., dry wells), GDEs (e.g., water stress impacts on growth, reproduction, and even mortality due to lack of groundwater), and surface water users (e.g., lower streamflows).	Using January 1, 2015 as a reference point is acceptable for development of the GSP MOs and IMs.
61	Sandi Matsumoto	The Nature Conservancy	P. 5-27				· Please provide more data and an elaborated description on how current basin conditions have not varied from January 1, 2015 conditions.	This can potentially be added as more data is available in the future.
62	Sandi Matsumoto	The Nature Conservancy	P. 5-27				· Even if current basin conditions may not have varied from January 1, 2015, the onus is on the GSAs to determine whether groundwater conditions are causing any adverse impacts to beneficial users. And if so, to recognize these impacts and establish thresholds and measurable objectives that can avoid adverse impacts to beneficial users caused by groundwater in all water year types.	This will be performed through monitoring during GSP implementation.
63	Sandi Matsumoto	The Nature Conservancy	P. 5-27				· According to Table 2-2 in the Draft GSP, 5994 AF of surface water was depleted in 2017. Please investigate whether these depletions in surface water are adversely impacting instream flow conditions and groundwater levels in riparian areas for environmental beneficial users, especially legally protected species.	Data does not currently exist to assess this, but it could potentially be assessed in the future.
64	Sandi Matsumoto	The Nature Conservancy	P. 5-27				· Please describe any differences between the selected minimum threshold and state, federal, or local standards relevant to the species or habitats residing in GDEs or aquatic ecosystems dependent on interconnected surface waters [23 CCR §354.28 (b)(5)].	Data does not currently exist to assess this, but it could potentially be assessed in the future.
65	Roberta Jaffe and Stephen Gliessman		5.19 Appendix A			Hydrographs of Representative Wells	Comment: It is helpful to group the wells by threshold region to get a better understanding of the impact of MTs in each region. The region-based analysis of the compilation of hydrographs shows the following: There are no wells in the entire Basin where the MT is set to bring the GWL above current GWL. The identified management area of the Central Region, where the most critical overdraft is and almost all of the wells have a downward trend, has most of its wells' MTs set with a goal of keeping them at the GWL where they are now. Most of the Western region wells, which are characterized as domestic or rangeland wells (i.e. shallow), have MTs 20 feet below current GWL. While the map of representative wells (p.5.8) does not separate a NW and FarNW region, Table 5.1 (p.5.17) does. Looking at the map, it appears that the wells located in the Far NW region would generally be ranch and rangeland wells while the Northwestern wells are the recently drilled wells used for irrigating the newly planted vineyard. Almost all of the wells in the Western, Northwest and Far Northwest regions have MTs set at least 20 feet below current GWL.	The wells are organized by OPTI Well number to make them easy to find.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 6
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
1	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	Entire Document				Very little information in this document specific to Cuyama DMS. Most of this document could apply to any basin where the Opti system has been used.	Comment noted.
2	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 6-3			As the needs of the Cuyama Basin	Can the GSA re-configure/maintain the DMS in the future or does W-C have to do it?	The CBGSA will have the ability to choose how to update the DMS in the future.
3	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 6-8			6.3 Data Included in the DMS	Provide some statistics on data in the DMS. Number of wells, average depth, number of wells having perforation data, WL data, WQ data, etc.	The text has been revised to report the number of wells and the number of those that have historical GWL and TDS measurements.
4	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 6-10			In many cases, there were discrepancies	Was it automatically assumed that DEM is more accurate than GSE identified in the other sources?	No, the DEM was used just so that all well measurements could be compared by the same benchmark.
5	Brenton Kelly	Quail Springs Permaculture	General			OPTI	Comment: Well identification and locations are hard to correlate with other standardized ID system like the State Well ID. Suggestion: A searchable cross reference table with State Well ID # would be very helpful. Correction: All the depth to groundwater charts in OPTI DMS are upside down compared to the groundwater elevation chart. It now looks like the depth to water is improving while groundwater levels are declining. Is this the way this GSP will fix everything?	The depth to groundwater charts have been corrected. Other DMS updates can be considered during GSP implementation.
6	Brenton Kelly	Quail Springs Permaculture	P. 6.4 Sec. 6.2.2 Table 6.2			Table 6-2 lists the information that is collected ...	Comment: Of the almost 40 fields of information on this table, less than 10 are entered for any well site. Of concern are the construction info, well depth and perforation intervals and the status or classification (abandoned, domestic, agricultural, etc.). Addition: This investigative Data collection and entry must be prioritized early in Implementation and loaded into the OPTI DMS.	Additional data entry can be considered during GSP implementation.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 7
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
1	Meg Brown						Management areas: The Plan notes that the Central Basin and part of Ventucopa are critically overdrafted, and are a major focus for sustainability. I am concerned that the other areas of the basin may therefore continue to use water in a less than sustainable fashion. The Plan should be clear about the need for all parts of the basin to be closely monitored to ensure sustainable use practices are effected.	This is addressed in the Monitoring Networks Chapter.
2	Meg Brown						Projects: While the scale of the problem in the Basin is staggering, the Plan should explore practices and technologies that can help improve efficiencies of water use.	The GSA cannot regulate water use efficiency practices under SGMA
3	Meg Brown						The cloud seeding project appears to have inconsistent numbers in terms of number of AF (pg 16 has 1500 AF annually over 50 yrs, while pg 17 has 4200 AF), so please explain the difference.	The text has been corrected.
4	Meg Brown						Pumping Allocations: The Plan should indicate how diminimus users in the basin will be defined, and if they will have allocations. Also, the Plan does not address how additional acres brought into irrigation will affect allocations. It may also be important to consider more strict considerations by CBGSA counties for approving new ag wells in this highly deficit basin.	The specifics for pumping allocations will be determined during GSP implementation.
5	Matt Young	SBCWA	P. 7-5	2			Please clarify what happens to areas with more than 2 feet of overdraft over a given timeframe going forward. For example if an area is shown to have a decrease >2ft/year over X number of years, it would be designated as a management area.	The text has been clarified that the 2 feet of overdraft standard is based on numerical modeling, not monitoring levels. While this approach has been used to develop the current management area boundaries, it has not been determined whether the same method would be used in a future update.
6	Matt Young	SBCWA	P. 7-5	2			"While the Cuyama Community Service District (CCSD) service area also has modeled overdraft exceeding 2 feet, it is not included in the management area." Please briefly explain why it was not included for the reader.	The text has been modified.
7	Matt Young	SBCWA	P. 7-9	Table 7-2			please define what would constitute "groundwater levels decrease sufficiently". This is an item that should be discussed by the GSA Board.	The text has been revised to reflect Board direction on adaptive management
8	Matt Young	SBCWA	7.5				A figure showing cumulative change in storage with and without pumping reductions as implemented along the proposed glide path (similar to Figure 7-3) would be useful for the reader.	Since we did not do a model simulation of the glide path, model results are not available to develop a similar figure.
9	Matt Young	SBCWA	7.5.2				Please change "is intending to implement pumping allocations" to "will implement pumping allocations".	The text has been changed.
10	Matt Young	SBCWA	P. 7-28				"Native sustainable yield". This would be good to include in a master glossary of key terms.	The text has been changed.
11	Matt Young	SBCWA	P. 7-31				Adaptive Management Triggers should be discussed by the GSA Board. This section would also be a good place to include policy about areas demonstrating >2 feet/year decline over a given period.	The text has been revised to reflect Board direction on adaptive management
12	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-5			The CBGSA has designated two areas in the Basin as ...	On what basis was the criteria of 2 feet selected? For example, why would 1 foot or 3 feet not be equally acceptable? Why is the Management Area based on a model-calculated water level decline rather than something like land and/or water use conditions (well density, crop density, high water demand crops, etc.) which have much less uncertainty and are not influenced by model errors. For example, the area where model-calculated water level decline is > 2 feet is sensitive to modeled aquifer property values. For example, using the historical run and considering the entire model domain, the area where drawdown is > 2 ft increased from 17,300 acres to 18,100 acres after increasing the modeled hydraulic conductivity in layer 3 by a factor of 10. This increases the total area outside the Water District with a modeled drawdown greater than 2 ft, so it has the effect of shifting the boundary of the Management Area.	This criteria was set by the GSA Board, but could be changed if the Board provides different direction.
13	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-27 Section 7.5.2				Was the relationship between pumping changes in areas outside the Central Basin and the benefit of Central Basin Management Area pumping allocations assessed? Specifically, was it verified that pumping increases in any of the areas outside the Central Basin have no effect on management actions implemented in the Central Basin? A more conservative approach would employ pumping allocations Was the relationship between pumping changes in areas outside the Central Basin and the benefit of Central Basin Management Area pumping allocations assessed? Specifically, was it verified that pumping increases in any of the areas outside the Central Basin have no effect on management actions implemented in the Central Basin? A more conservative approach would employ pumping allocations in the Central Basin and specify no further pumping increases allowed in areas outside the Central Basin MA unless it can be verified the additional pumping will not negatively impact the benefits from Central Basin allocations.	Pumping allocations outside the management areas can be considered in a future update of the GSP.
14	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-28			Because pumping allocations would only be imposed on users ...	This does not account for recharge to the Central Basin that originates outside the Central Basin. Subsurface flow from areas outside the CBWD is sensitive to changes in aquifer parameters.	This could be evaluated in greater detail when morer data is available in the future.
15	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-28			To the extent feasible, the CBGSA would determine ...	Is a groundwater user that has been pumping for 1 year given the same priority as a user that has been pumping for 20-years or longer?	The text has been revised to be less definitive. The exact method to determine historical use will be determined during GSP implementation.
16	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-30			CBGSA has the authority to develop a pumping allocation ...	What about the impact of CBGSA enforced pumping allocations on groundwater rights?	Pumping allocations do not affect groundwater rights, just the quantity of water that water rights holders are able to pump.
17	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-28			The CBGSA anticipates that...	Shouldn't the new supplies be added to the available supply for those users who paid for the new supply?	The text has been revised
18	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-7 Table 7-1			Adaptive Management	Adaptive Management should be done routinely with the aim of verifying the expected benefit from pumpage reductions and adjusting the glide path accordingly.	The adaptive management section reflects direction provided by the Board. This is not included in the adaptive management policies specified by the Board. The Board can choose to adjust the glide path as additional data is available in the future.
19	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-29 Figure 7-4				The glide path does not account for uncertainty or provide flexibility to manage the basin adaptively.	The GSA Board can choose to adjust the glide path as additional data is available in the future.
20	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-31				What happens if the benefit to groundwater storage exceeds the expected benefit for the actual pumpage reduction? Will the pumping allocations be increased accordingly?	Adaptive management language has been revised per direction from the GSA Board.
21	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-5			The CBGSA has designated two areas	Why was 2 feet selected? Why not 3, 4, etc? Why base it on an area of water level decline rather than an area of defined land use (for example, well density, crop density, high water demand crops, etc.)	This criteria was set by the GSA Board, but could be changed if the Board provides different direction.
22	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-5			The remaining areas in the Basin are	What scenario was used to come to this conclusion?	This was concluded from results of the 50-year Baseline simulation.
23	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-7 Table 7-1			Adaptive Management	Adaptive Management should be done routinely with the aim of verifying the expected benefit from pumpage reductions and adjusting the glide path accordingly.	This is not included in the adaptive management policies specified in the GSP. The Board can choose to adjust the glide path as additional data is available in the future.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 7
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "..."	Comment	Response to Comment
24	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-28			Because pumping allocations would	Does not account for recharge to the Central Basin that originates outside the Central Basin.	This is accounted for in the model simulation used to estimate required pumping reductions.
25	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-28			To the extent feasible, the CBGSA	This may be inconsistent with SGMA's intent to have no effect on existing water rights, including overlying rights.	The text has been revised to be less definitive. The exact method to determine historical use will be determined during GSP implementation.
26	Jeff Shaw, John Fio, Dave Leighton	EKI Environment & Water	P. 7-31			Adaptive Management	What happens if the benefit to groundwater storage exceeds expectations for the actual pumpage reduction (i.e., what if water levels recover faster, or to a higher elevation than expected)?	The GSA Board can choose to adjust the glide path as additional data is available in the future.
27	Brenton Kelly	Quail Springs Permaculture	P. 7.6 Sec. 7.2			Figure 7-1 - Cuyama GW Basin CBGSA Management Areas	Addition: Please show the Foothill and Bell Roads as a background layer for "proximity"	The figure has been updated.
28	Brenton Kelly	Quail Springs Permaculture	P. 7.6			Figure 7-1 - Cuyama GW Basin CBGSA Management Areas	Addition: The Santa Barbara Canyon Fault needs to be examined more definitively to fill data gaps.	No change needed in document.
29	Brenton Kelly	Quail Springs Permaculture	P. 7.16 Sec. 7.4.2			"This project would target cloud ..."	Addition: Text needs a citation for the statement of 10% increase in precipitation	This is the average of the 5-15% range cited in the paragraph above.
30	Brenton Kelly	Quail Springs Permaculture	P. 7.22 Sec. 7.4.4			This management action would include...	Comment: It is agreed that the disadvantaged communities of Cuyama Valley need resilience and reliability for their domestic supply. It is good to consider the opportunities, like it's good to wish for luck. Question: What would this look like? Grant writing or well wishing?	Potential financing options are discussed in Chapter 8.
31	Brenton Kelly	Quail Springs Permaculture	P. 7.28 Sec. 7.5.2			A specific approach for allocation of pumping volumes among...	Question: So if groundwater users must decrease pumping by approximately 67 percent, and we have not determined a way to do that, what is the Plan?	This will be determined during GSP implementation.
32	Brenton Kelly	Quail Springs Permaculture	P. 7.29 Sec. 7.5.2 Figure 7-4			Glide Path for Central Basin Management Area Groundwater Pumping Reductions	Comment: The Timeline for Implementation or "glide slope" is a big expectation. Question: How are we going to accomplish this logistically or financially? What is the Plan?	This will be determined during GSP implementation.
33	Roberta Jaffe and Stephen Gliessman		Global Comment				Recommendation: Due to the overdraft determined by the model, and the need to reduce it, it is recommended that a moratorium on new wells be instituted in the Cuyama Valley until a proper allocation system is developed and implemented. Otherwise, the overdraft will only worsen.	Water Code section 10725.6 authorizes a GSA to require registration of a well within its management area. Additionally, section 10726.4(a)(2) authorizes a GSA to control pumping by regulating, limiting, or suspending extractions from individual wells or extractions from wells in the aggregate, construction of new groundwater wells, enlargement of existing wells, or reactivation of abandoned groundwater wells, or otherwise establishing groundwater extraction allocations. However, that same subsection provides that any limitation on pumping by a GSA shall not be construed to be a final determination of rights to pump groundwater. So whatever controls on pumping a GSA implements needs to address current and projected conditions, and be adaptive over the life of the GSP. The GSA will need to decide as data is developed and the model is refined which of these tools should be employed and for how long.
34	Roberta Jaffe and Stephen Gliessman		7.5.1 P.7.25			The small population of...	Comment: This statement does not make sense since it seems to focus only on the population that lives in the valley, not the agricultural firms that own or lease the land that is farmed, and definitely have the economic resources to fund projects – especially when their operations stand to gain the most from management actions that are designed to increase recharge	No change needed in document.
35	Roberta Jaffe and Stephen Gliessman		7.5.1 P.7.25			management actions "could affect the economic health of the region and on local agricultural industry. It would also consider the projected changes to the region's land uses and population and whether implementation of these projects would support projected and planned growth."	Comment: No studies have been done on what the actual drivers are of economic health in the valley, especially for the resident population, and how connected they are to groundwater conditions. All groundwater studies done leading up to this GSP have focused on water use by the big agricultural interests, who obviously stand to suffer economic impact when groundwater use is reduced, but nothing is known regarding impacts on residents in the valley, especially disadvantaged communities. Part of the issue is related to impacts on jobs in the valley, and part is related to impacts of domestic wells and water supplies of "de minimis users (which have not yet been defined). Recommendation: The economic analysis must go beyond the large agricultural interests and include impact on local residents as well as the impact on industry and residents in the Basin if water use continues without change during the next 5-20 years.	An economic analysis of the effects of GSP actions on the Basin will be conducted soon.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 7
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
36	Roberta Jaffe and Stephen Gliessman		7.5.2 P. 7.27			Comment is on this whole section	Comment: This section supposedly addresses setting limits on pumping, however the only real comment that says reduction is needed is in the first paragraph that says "pumping must be reduced 67% if the basin is to come into balance" (where pumping equals recharge). From there on the focus is on allocation, and without any actual pumpage data, there currently is no way to determine if pumpage reduction takes place. Even the use of the term "allocation" seems to be incorrect, since the reduction in overdraft is not about how much water users should get, but really about how much they should cut back. Pumping "reductions" would be the more proper terminology. Recommendation: Data is needed regarding recharge by aging the water to determine if recharge is happening and, if so, the rate of recharge. Then a more accurate rate of pumping reduction can occur.	This will be determined during GSP implementation.
37	Roberta Jaffe and Stephen Gliessman		7.5.2 P. 7.27			Outlined here is a framework for how CBGSA would develop and implement ...	Comment: The issue comes up again as well as to why only the Central Basin Management Area is going to receive "allocations" – aka. pumping reductions, when the entire Basin is considered in critical overdraft. Is the <2ft drop in groundwater levels an enforceable limit to groundwater drop? Will MT's be enforceable limits to how low water levels can go? Should the rest of the Basin be allowed to continue to pump without limits? Recommendation: Develop a framework that shows the interconnectivity in the Basin between the different parts of the Basin as a whole watershed so that impacts of pumping in one part of the Basin can be connected to other parts of the Basin.	The GSA Board has not specified pumping allocations for areas outside of the management areas.
38	Roberta Jaffe and Stephen Gliessman		7.5.2 P. 7.28			The required decreases in pumping volumes...	Comment: This entire section seems like it is just pushing off the inevitable need to reduce pumping. Implementation of reductions will not take place before 2023, and the process for setting up "allocations" and pumping reductions seems vague and uncertain at this time, that it is really not a Plan. Meanwhile, groundwater levels will continue to drop since pumpage will not change. In fact, despite the fact that SGMA and DWR require a Plan to be submitted for how sustainability of groundwater in the Cuyama Basin will be achieved, this section basically says work will begin on some kind of plan after this GSP is submitted. Other than the Glide Path for % reductions over 20 years, there are no elements of what the plan will be, how it will be funded, and who will enforce it. Recommendation: This is an incomplete plan. It needs to have these components added before 2022. Recommend the GSA have as a priority developing these components and submitting the to DWR for review.	This will be determined during GSP implementation.
39	Cathy Martin	SLO County	7.2			While the Cuyama Community...	Consider discussing why the CCSD is not included in the management area.	Additional text has been added.
40	Cathy Martin	SLO County	7.4				Consider adding a new project for updating the numerical modeling to help address the uncertainties in the current model. The update to the numerical model should include new monitoring data prior to the DWR interim GSP milestone in 2025 or 2030. This project would need to be discussed in the Chapter 7 Management Actions and Chapter 8 Implementations with associated cost and description.	This can be considered by the GSA Board in the future.
41	Cathy Martin	SLO County	7.4			Projects included in this GSP	Consider adding on a volunteer basis to member agencies - "... member agencies on a volunteer basis...."	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
42	Cathy Martin	SLO County	P. 7-13			If pursued, the CBGSA anticipates...	Consider adding on a volunteer basis to member agencies - "...one of its member agencies on a volunteer basis."	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
43	Cathy Martin	SLO County	P. 7-13			Once a preferred alternative	Consider adding on a volunteer basis to member agencies- "...one of its member agencies on a volunteer basis."	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
44	Cathy Martin	SLO County	P. 7-13			As public water supply agencies, any	Consider text revisions text - "As a public agency, any CBGSA members (on a volunteer basis) has authority to implement the project once land is acquired and applicable permits are secured."	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
45	Cathy Martin	SLO County	P. 7-16			If a precipitation enhancement...	Consider verifying with Santa Barbara on the the existing permits/EIR, and expanding on the existing SBCWA program (vague language).	This would be determined during GSP implementation
46	Cathy Martin	SLO County	P. 7-18			The project would be implemented	Consider adding "one of the member agencies of the CBGSA on a volunteer basis."	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
47	Cathy Martin	SLO County	P. 7-20				Consider adding the following language, if the project is not removed by the GSA Board: "...The current assumption is that any project using direct recharge through recharge basins will be initiated and owned by the County or GSA Board. This assumption results prevents private ownership of recharged groundwater from these projects, allowing all recharged groundwater to be available to all groundwater pumpers..."	This limitation has not been approved by the CBGSA Board
48	Cathy Martin	SLO County	P. 7-20 - 7-23				Cross out all of section 7.4.3	This is contrary to Board direction. As noted, this action would only be taken in combination with flood/stormwater capture.
49	Cathy Martin	SLO County	P. 7-22			Changes to stormwater capture	Pending GSA Board action on this item, please clarify this sentence if the project is not removed - "Changes to stormwater capture and recharge facilities that may result from this feasibility study would receive CEQA and NEPA coverage under those facilities' environmental documentation. " Also, would permit revisions be required by the other facilities, such as Twitchell Reservoir?	As noted, additional study would be required prior to implementation of this action.
50	Cathy Martin	SLO County	P. 7-23			In addition to a well drilling permit...	Consider adding the name of the County	This has been added.
51	Cathy Martin	SLO County	P. 7-25			In total, these improvements	Consider adding "...approximately \$1,175,000. Projects are funded by the CCSD and VWSC."	Financing options are discussed in Chapter 8.
52	Cathy Martin	SLO County	7.5 P. 7-25				Please add a discussion (if direct by the GSA Board) or option on De Minimis Groundwater Users, such as below. De minimis groundwater users are not currently regulated under this GSP. Growth of de minimis groundwater extractors could warrant regulated use in this GSP in the future. Growth will be monitored and reevaluated periodically.	The Board has not provided specific direction on de minimis users. This will be determined during GSP implementation.
53	Cathy Martin	SLO County	7.5 P. 7-25			Water management actions are generally	Consider adding on a volunteer basis to member agencies - "... member agencies on a volunteer basis...."	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
54	Cathy Martin	SLO County	7.5.2 P. 7-27			No pumping allocations would	Please discuss why Ventucopa Management Area is not performing the reduction in pumping.	The text has been revised
55	Cathy Martin	SLO County	7.5.2 P. 7-27			CCSD would be provided allocations	Please define the historical use for CCSD and why the CCSD is not performing the reduction in pumping.	The rationale for not including the CCSD in a management area has been added to section 7.2
56	Cathy Martin	SLO County	P. 7-28			Develop Allocations	Considering creating a list of potential plans/studies for the GSA Board to take future action on, such as remote sensing, pumping allocation plan, calculating native sustainable yield for only the Central Basin Management Area, Rate assessment, and etc.	This will be determined during GSP implementation.
57	Cathy Martin	SLO County	P. 7-30			Successful implementation would...	Consider adding on a volunteer basis to member agencies - "...member agencies on a volunteer basis."	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
58	Cathy Martin	SLO County	P. 7-30			Mechanisms for enforcement	Consider adding - "...CBGSA or member agencies on a volunteer basis."	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 7
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
59	Cathy Martin	SLO County	7-6 P. 7-31			Adaptive Management	Consider defining and expanding Adaptive Management for the GSA Board, such as the purpose of the Adaptive Management is to provide the final "check and balance" for the GSP to ensure that the overall objectives of the groundwater basin are being met. Adaptive Management is also used to provide guidance on the overall effectiveness of the GSP and to provide a tool with which to modify the programs to better meet the overall Basin objectives.	Adaptive management language has been revised per direction from the GSA Board.
60	Cathy Martin	SLO County	7-6 P. 7-31			Pumping reductions are more than 5...	Consider defining how the 5% is being calculated, such as from the numerical model	This will be determined during GSP implementation.
61	Cathy Martin	SLO County	7-6 P. 7-31			If the Basin is within the Margin of	Consider defining how the 10% is being calculated, such as from the numerical model	This will be determined during GSP implementation.
62	Cathy Martin	SLO County	P. 7-18			Implementation of this project would...	Automated High Output Ground Seeding System (AHOGS)	This has been added.
63	Cathy Martin	SLO County	P. 7-19			This studied evaluated...	Change "studied" to "study"	The text has been revised
64	Cathy Martin	SLO County	P. 7-19			"Cloud seeding has been conducted..."	Change to "...in portions of Santa Barbara County..."	The text has been revised
65	Sue Blackshear						The glide path to sustainability: Because the minimum thresholds are based on 2015 data, they allow continued high usage of water with only a gradual decrease of usage over each five year period until 2020, when groundwater levels would have become "sustainable" at the 2015 level. This would mean that groundwater will continue to be depleted as has been the case now for years--until 2020. This seems to be almost business as usual. I recognize that the profits of agriculture in the area and therefore the tax profits of the state from agriculture are a real consideration; but the future of 'life' in the Cuyama Basin-- for native plants, animals, birds, and pollinators and for ordinary people and small farmers requires change that does not allow further depletion of the groundwater for the next 21 years.	The glide path reflects the direction of the CBGSA Board. The Board can consider revising the glide path in the future.
66	Sandi Matsumoto	The Nature Conservancy	7.1				"Please describe how the projects described in this chapter and their benefits will help "maintain a viable groundwater resource for the beneficial use of people and the environment" as stated in the sustainability goal for the Cuyama Basin.	This is reflected in the project descriptions.
67	Jane Wooster		7.4.1			Flood and stormwater capture	Specfics should be included about how Twitchell Reservoir makes this project infeasible or why wou will be able to overcoe that. Twitchell Reservoir holds less than 200,000 AF and water is used to replenish downstream basin.	As noted in the chapter, this will be determined through additional study during GSP implementation.
68	Jane Wooster		7.4.2			Precipitation enhancement	This analysis does not address the concernts of organic producers that were raised at GSP meetings nor has it ever addressed the issue of rain shadow where enhancing rain in one area creates drought in another. This should be addressed.	As noted in the chapter, these will be addressed additional study during GSP implementation.
69	Jane Wooster						The plan should consider logical, affordable and easily implemented projectes such as removing certain trees in the river bottom which are invasive species and which use (reportedly) up to 250 gallons of water per day.	Additional actions can be considered and studied during GSP implementation.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 8
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
1	Meg Brown						Cost of Plan implementation: The proposed Projects and Management Actions are extremely costly, particularly when you consider the very sparsely populated basin, the disadvantaged status of the community, and the scale of the problem. The economic analysis should highlight this in more detail, but it begs the question of how realistic are any of the proposed projects that at first analysis, provide only minimal increases in water availability and stability.	All projects would be evaluated in greater detail prior to implementation.
2	Matt Young	SBCWA	P. 8.9, Section 8.4.9				Coordination regarding Twitchell would most likely be with the Twitchell Management Authority and Santa Maria Valley Water Conservation District. The Santa Maria basin is in the process of DWR reprioritization to "Very Low" priority, removing SGMA requirements, and the Santa Maria Fringe GSA in Santa Barbara County is likely to be dissolved.	No change needed to document as the existing paragraph is accurate.
3	Brenton Kelly	Quail Springs Permaculture	P. 8.4 Sec. 8.2.1			the CBGSA will develop a financing plan that will include one or more of the following financing approaches....	Comment: Pumping Fee or Assessments, Allocations or Restrictions. There may be plenty of ways to approach this difficult policy implementation, but this GSP make no determination how it will be done. Question: Does the Implementation Plan simply intend to come up with a plan of how to implement pumping reductions goals? A Plan to make a plan!	As noted, this will be determined during GSP implementation.
4	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 5, 1.1			Adaptive management	Addition: Please define the term "adaptive management"	This is discussed in Chapter 7.
5	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 6, 1.1, Fig 8-1			Implementation Schedule	Change: Figure 8-1 is not adequately labeled. The section spanning years is not labeled at all and the items in the column Task Name do not correspond to any of the items in the timeline. Please present this timeline in a more understandable format.	The figure is using a standard Microsoft Project schedule format. Task descriptions for local communities projects have been updated to more closely match the descriptions in Chapter 2.
6	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 6, 1.1, Fig 8-1			Implementation Schedule	Question: It appears that under Project Implementation, Task 4, drilling new wells for CCSD and for Ventucopa is suggested. These processes are described in Chapter 7, with estimated costs. However, verbally in SAC and GSA meetings, this task is not suggesting that the GSA pay for the drilling of these wells, but instead would support writing grants to obtain the funds for these wells. The 2019-20 Budget Draft, as presented in the GSA packet on May 1, 2019, includes \$40,000 for Grant Proposals and \$15,000 for Grant Administration. Yet it is unclear if those items will be allocated for seeking grants to pay for these two wells, or seeking grants to fund the GSA and GSP implementation. Please add language to this task and to Chapter 7 that clarifies the GSA's actual involvement in these two projects. From the Implementation Schedule and in Chapter 7, the language is very misleading and does not accurately reflect what has been said verbally in public meetings.	Financing options for these projects are included in Table 8-2. Financing does not need to be provided directly by the GSA for the projects to be included in the GSP.
7	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 7, 1.1, Fig 8-1			Implementation Schedule	Question: It appears that under Management Action Implementation, Task 2, "Determine Sustainable Yield" will be completed by January 2021. However the Final GSP Emergency Regulations indicate that Sustainable Yield is required to be included in the GSP, which must be finalized by January 2020. Source: Final GSP Emergency Regulations, Section 354.8 (b)(7)	This line has been removed from the schedule. Sustainable yield is described in Chapter 2.
8	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 9, 8.2.1			2nd bullet point: Stakeholder/Board engagement: Quarterly Stakeholder Advisory Committee (SAC) meetings, bimonthly CBGSA Board meetings, bi-monthly calls with the CBGSA Board ad-hoc committees, and semi-annual public workshops	Change: Change Quarterly Stakeholder Advisory Committee (SAC) meetings to Bi- Monthly to reflect the schedule proposed in the May 1 meeting of the CBGSA.	This has been changed.
9	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 11, Table 8-2			Project 4: Improve reliability of Water Supplies for Local Communities	Delete: Given the current lack of financial resources at the CCSD and VWSC, it is highly unlikely that CCSD and VWSC Operating Costs could be used to finance the drilling of these wells. These two potential funding sources should be removed from this list. It should be clearly noted that the CBGSA has no intention of paying for these wells and proposing them as a project of the CBGSA and including them in the Draft GSP is extremely misleading.	This is listed as one potential financing source. Table 8-2 shows the potential financing options for these projects. Financing does not need to be provided directly by the GSA for the projects to be included in the GSP.
10	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 11, Table 8-2			Mention of "Member Agencies" as Responsible Entity or Potential Funding Source	Delete: Including any mention of "Member Agencies" is extremely misleading and runs counter to the vote taken by the SBGSA on April 3, 2019 that did not approve Member Agencies, namely the CBWD, to be the responsible Entity or Potential Funding Source for implementation of the plan. To be consistent with the CBGSA's vote, please remove all instances of "Member Agencies" from Table 8-2. Source: 2019-05-01-CBGSA-Board-Packet-public-1.pdf, P. 11	Since the financing mechanisms for these projects and actions have not been determined, CBGSA member agencies continue to be a potential financing option
11	Lynn Carlisle	Cuyama Valley Family Resource Center	P. 12, 8.3.2			Basin Conditions	Addition: Unless specified as part of the identified monitoring network, groundwater levels should also be reported on the 20 piezometers proposed to be installed to monitor GDEs across the valley. Please add Groundwater Elevation Data from piezometer network as a separate bullet point.	The section on GDEs in Chapter 2 has been revised to note the need for piezometers to monitor levels for GDEs.
12	Cathy Martin	SLO County	8.1.1 P. 8-1			Adaptive management would only be	Consider defining and expanding Adaptive Management, such as the purpose of the Adaptive Management is to provide the final "check and balance" for the GSP to ensure that the overall objectives of the groundwater basin are being met. Adaptive Management is also used to provide guidance on the overall effectiveness of the GSP and to provide a tool with which to modify the programs to better meet the overall Basin objectives.	Adaptive management is described in Chapter 7 and reflects direction from the GSA Board.
13	Cathy Martin	SLO County	Table 8-1			Project 3 cost	Correction \$600 - \$2,800 (missing hyphen)	This has been corrected.
14	Cathy Martin	SLO County	Table 8-1			Project 4: Basin-Wide Economic...	Does this include data for the rate assessment?	No. As described in Chapter 7, this will be an economic analysis of the projects and management actions included in the GSP.
15	Cathy Martin	SLO County	Table 8-1			\$75,000 annually for fiscal years...	Please clarify activity/estimated cost to justify the cost. This seems like the same work effort as the annual report and Five-Year GSP updates.	Activities associated with this item are described in the text following the table. These are all distinct work efforts. A more detailed scope and cost estimate will be developed when the GSA issues a task order for completion of these tasks.
16	Cathy Martin	SLO County	Table 8-1			\$155,000 annually for FYs...	Please clarify activity/estimated cost to justify the cost. This seems like the same data and work effort as above.	Activities associated with this item are described in the text following the table. These are all distinct work efforts. A more detailed scope and cost estimate will be developed when the GSA issues a task order for completion of these tasks.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 8
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
17	Cathy Martin	SLO County	Table 8-1			Additional costs during initial years...	Please clarify activity/estimated cost to justify the cost. This seems like the same data and work effort as above.	Activities associated with this item are described in the text following the table. These are all distinct work efforts. A more detailed scope and cost estimate will be developed when the GSA issues a task order for completion of these tasks.
18	Cathy Martin	SLO County	Table 8-1			\$800,000 every five years ...	Please clarify activity/estimated cost to justify the cost. This seems like the same data and work effort as above.	Activities associated with this item are described in the text following the table. These are all distinct work efforts. A more detailed scope and cost estimate will be developed when the GSA issues a task order for completion of these tasks.
19	Cathy Martin	SLO County	8.2.1 P. 8-4			Stakeholder and Board Engagement	Update per direction by the GSA Board, May 1st meeting	This has been corrected.
20	Cathy Martin	SLO County	8.2.1 P. 8-4			CBGSA operations are partially	Consider adding "...member agencies volunteer funding.	The text has been revised.
21	Cathy Martin	SLO County	8.2.1 P. 8-4			Although ongoing operation of	Consider revising the sentence and adding something similar to the CBGSA member agencies to fund the start-up CBGSA administrative cost on a volunteer basis until the CBGSA funding is in place.	The text has been revised.
22	Cathy Martin	SLO County	P. 8-5			During development of a financing plan, the	Consider adding a discussion on a option to exclude De Minimis Groundwater Users from the GSP. If excluded by the GSA Board then maybe stating De minimis groundwater users are not currently regulated under this GSP. Growth of de minimis groundwater extractors could warrant regulated use in this GSP in the future. Growth will be monitored and reevaluated periodically.	The Board has not provided specific direction on de minimis users. This will be determined during GSP implementation.
23	Cathy Martin	SLO County	P. 8-5			Combination of fees and assessments	Consider adding a sentence on a option to exclude De Minimis Groundwater Users from the GSP.	The Board has not provided specific direction on de minimis users. This will be determined during GSP implementation.
24	Cathy Martin	SLO County	P. 8-5			Pumping fees: Pumping fees would	Consider adding a sentence on a option to exclude De Minimis Groundwater Users from the GSP.	The Board has not provided specific direction on de minimis users. This will be determined during GSP implementation.
25	Cathy Martin	SLO County	P. 8-5			Assessments: Assessments would charge a	Consider adding a sentence on a option to exclude De Minimis Groundwater Users from the GSP.	The Board has not provided specific direction on de minimis users. This will be determined during GSP implementation.
26	Cathy Martin	SLO County	Table 8-2			Potential Financing column, Project 1 Feasibility Study	Consider adding CBGSA Member Agencies (Volunteer)	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
27	Cathy Martin	SLO County	Table 8-2			Responsible Entity column, Project 1 Project Implementation	Consider adding CBGSA Member Agencies (Volunteer)	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
28	Cathy Martin	SLO County	Table 8-2			Potential Financing column, Project 1 Project Implementation	Consider adding CBGSA Member Agencies (Volunteer)	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
29	Cathy Martin	SLO County	Table 8-2			Potential Financing column, Project 2 Feasibility Study	Consider adding CBGSA Member Agencies (Volunteer)	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
30	Cathy Martin	SLO County	Table 8-2			Responsible Entity column, Project 2 Project Implementation	Consider adding CBGSA Member Agencies (Volunteer)	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
31	Cathy Martin	SLO County	Table 8-2			Potential Financing column, Project 2 Project Implementation	Consider adding CBGSA Member Agencies (Volunteer)	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
32	Cathy Martin	SLO County	Table 8-2			Responsible Entity column, Management Action 2 - Enforcement	Consider adding CBGSA Member Agencies (Volunteer)	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
33	Cathy Martin	SLO County	Table 8-2			Potential Financing column, Management Action 2 - Enforcement	Consider adding CBGSA Member Agencies (Volunteer)	A note that member agencies would participate on a voluntary basis has been added to the introduction to section 7.4
34	Cathy Martin	SLO County	8.4.1 P. 8-8			If any of the adaptive...	Please expand and clarify adaptive management triggers, see comment in Section 7.6	Adaptive management is described in Chapter 7 and has been updated per direction from the GSA Board.
35	Cathy Martin	SLO County	8.4.1 P. 8-8			If any of the adaptive...	Please add what chapter/section the adaptive management process is described. If this section is not included please add the discussion or options.	Adaptive management is described in Chapter 7. A reference is not needed here.
36	Jane Wooster		Table 8-1			Implementation costs	The Cuyama Valley does not have the resources to pay these costs. Many of these costs were never discussed with the GSA. \$46 million for flood and stormwater capture? Board engagement \$195,000 annually? \$40,000 for an annual financial statement? These items and many others are totally unreasonable and came from the consultants who wrote the plan and not from the GSA.	Some adjustments to the cost estimates have been made following discussion with the CBGSA budget ad-hoc committee. The costs currently in the document are a reasonable estimate of what is required to meet SGMA requirements.
37	Jane Wooster		P. 8-5			Assessments	The Board (GSA) decided that amounts "\$5-\$8 per acre per year" would be removed from the plan. Also when this was presented to the board (GSA) it said de minimis users would not be charged and grazing would be used as an example of a de minimis user.	References to cost ranges have been removed.
38	Jane Wooster		General				When it comes to costs and assessments much of this chapter has been written by Woodard & Curran before any consultation with the Board. Decisions have not been made and it is premature to include them as part of the plan at this point.	Because the Board has not determined a policy, Section 8.2.1 notes that a financing plan will be developed by the CBGSA going forward. The section on costs has been revised to note that the cost estimates may be revised as more information is available during GSP implementation.

Cuyama Basin Sustainability Section
Summary of Public Comments and Responses - Chapter 8
June 24, 2019

Comment #	Commenter	Commenter Organization	Section	Section Paragraph #	Paragraph's Sentence #	Sentence Starts with, "...	Comment	Response to Comment
39	Erinn Wilson	California Department of Fish and Wildlife Region 5					The GSP proposes three funding mechanisms to fund planning efforts: 1) fees based upon water usage; 2) fees based upon acreage within the Basin; or 3) a combination approach. CDFW believes that fees based upon water use is the most reasonable considering that current and historical water use patterns appear to be the main cause of overdraft conditions. The historic use and growth of agriculture, including wineries and legal cannabis cultivation, will continue to place demand on groundwater within the Cuyama Basin.	Comment noted.

On April 22, 2019 the Cuyama Basin draft GSP was released for public comments. The 30-day public comment period ended May 22, 2019. Please find a link to the GSP public comments and a list of the commenters below.

GSP Public Comments: <https://hgcpm.sharefile.com/d-s108d27a9b62486ea>

1. Central Coast Water Board, James Bishop
2. Public Comments from Stakeholder Workshop on 5/1/19
3. Richard and Susie Snedden, Kern County Landowner
4. John Comstock, New Cuyama Resident
5. Cheryl Tomchin, Cuyama Stakeholder
6. The Nature Conservancy, Sandi Matsumoto
7. Cottonwood Canyon Residents Landowners
8. Community Environmental Council, Sigrid Wright
9. Jane Wooster, CBGSA Director Landowner
10. Joshua Bower, Farm Intern at Uail Springs
11. Grapevine Capital, Neil Currie, Cleath Harris
12. Twitchell Management Authority, Michelle Rui
13. Brenton Kelly, SAC Vice Chair Uail Springs Permaculture Center
14. Cuyama Basin Water District, Matt Klinchuch
15. Dept of Fish and Wildlife, Julie Vance
16. Joe Haslett, SAC Member Landowner
17. John Orcutt, Cuyama Stakeholder
18. Karen Lewis, Cuyama Landowner
19. Kern Ridge Growers, LLC., Bob Giragosian
20. Cuyama Valley Family Resource Center, Lynn Carlisle
21. Meg Brown, Cuyama Stakeholder
22. Robbie Jaffe, SAC Chair Steve Gliessman, Condor's Hope
23. County of San Luis Obispo, Cathy Martin
24. Santa Barbara County Water Agency, Matt Young
25. Santa Maria Conservation District, Tom Gibbons
26. Sue Blackshear, Cuyama Stakeholder
27. Santa Barbara Pistachio Company, Dennis Gibb
28. Dept of Fish and Wildlife, Erinn Wilson
29. Matthias M Illner, Interested Party



TO: Board of Directors
Agenda Item No. 6e

FROM: Joe Hughes, Legal Counsel

DATE: July 10, 2019

SUBJECT: Discussion Regarding Process for Future Adjustment of Pumping Restrictions under GSP

Issue

Discussion on Mechanism for ensuring Pumping Changes are Equitable.

Recommended Motion

None – information only.

Discussion

Item No. 6e: Discussion Regarding Process for Future Adjustment of Pumping Restrictions under GSP is now a verbal report.

*ITEM NO. 6E: DISCUSSION REGARDING PROCESS FOR FUTURE
ADJUSTMENT OF PUMPING RESTRICTIONS UNDER GSP IS NOW A
VERBAL REPORT.*



TO: Board of Directors
Agenda Item No. 6f

FROM: Joe Hughes, Legal Counsel

DATE: July 10, 2019

SUBJECT: Notice of Intent to Adopt the GSP

Issue

Review the notification for the Intent to Adopt a Groundwater Sustainability Plan (GSP).

Recommended Motion

Adopt the Notification of Intent to Adopt a GSP.

Discussion

Provided as Attachment 1 is the draft letter for the Notification of Intent to Adopt a GSP. Once adopted, letters will be distributed to the Cuyama Community Services District, Santa Barbara County, Kern County, San Luis Obispo County, and Ventura County.



Directors:

July 10, 2019

Derek Yurosek
Chair

//

Lynn Compton
Vice Chair

//

//

//

Byron Albano

Re: Notification of Intent to Adopt a Groundwater Sustainability Plan

Cory Bantilan

Dear ___:

Tom Bracken

George Cappello

Pursuant to water code section §10728.4, this letter serves as a notice of intent for the Cuyama Basin Groundwater Sustainability Agency (CBGSA) to adopt a Groundwater Sustainability Plan at the conclusion of public hearing and 90-day public comment period.

Paul Chounet

If you have any questions, please contact Taylor Blakslee at (661) 477-3385, or tblakslee@hgcpm.com.

Zack Scrivner

Glenn Shephard

Das Williams

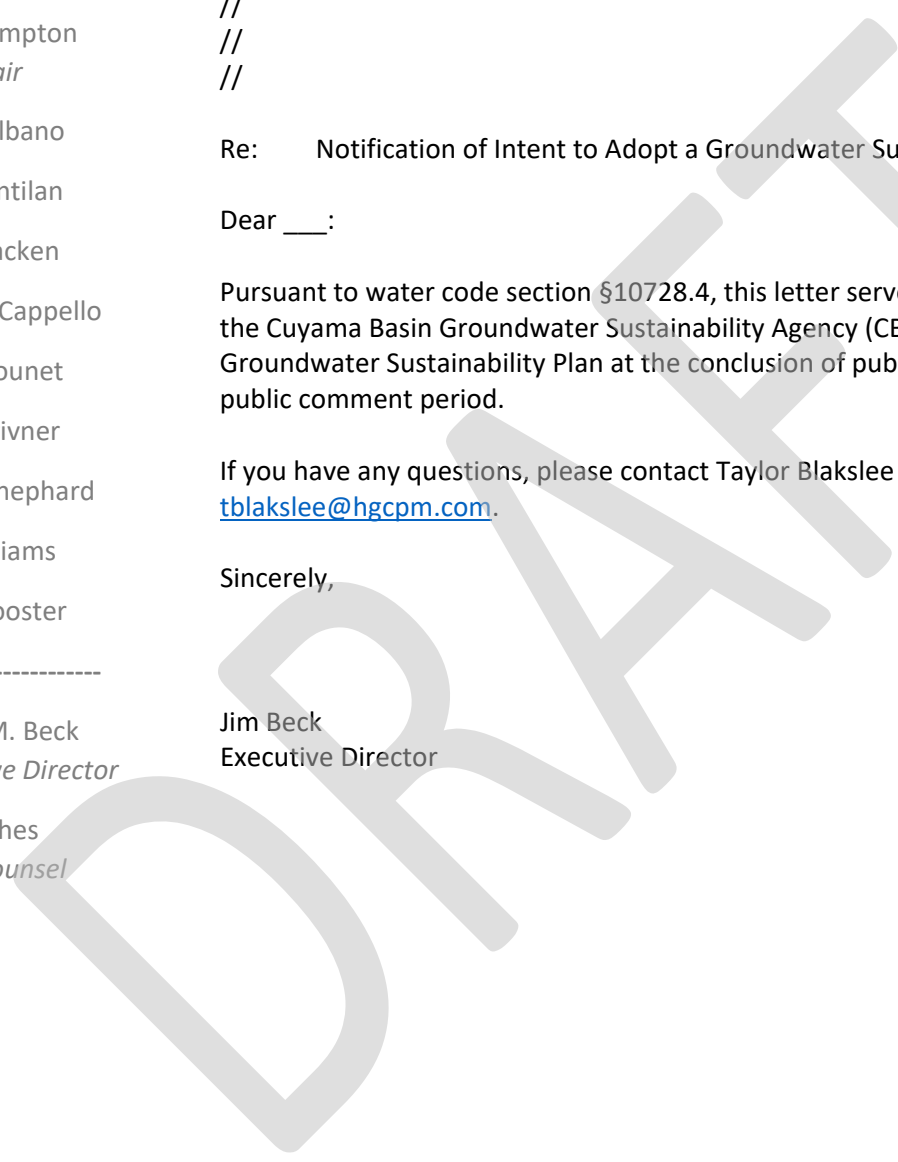
Sincerely,

Jane Wooster

James M. Beck
Executive Director

Jim Beck
Executive Director

Joe Hughes
Legal Counsel





TO: Board of Directors
Agenda Item No. 6g

FROM: Joe Hughes, Legal Counsel

DATE: July 10, 2019

SUBJECT: Set Public Hearing Date

Issue

Set the public hearing date.

Recommended Motion

Recommend setting a public hearing date concluding the 90-day public comment period.

Discussion

Following the 90-day public comment period for the Groundwater Sustainability Plan (GSP), there will be a public hearing to conclude the public comment period. Consultants are recommending the October 2, 2019 Cuyama Basin Groundwater Sustainability Agency (CBGSA) regular Board meeting be pushed back a week to Wednesday, October 9, 2019 (to accommodate a full 90 days starting July 10, 2019) and a public hearing be held that same day.



NOTICE OF SPECIAL PUBLIC MEETING AND PUBLIC HEARING

A Special Meeting of the Cuyama Basin Groundwater Sustainability Agency will be held Wednesday, October 9, 2019 in New Cuyama, CA to Hold a Public Hearing to Receive Public Comments on the Final Draft Groundwater Sustainability Plan (GSP)

On Wednesday, October 9, 2019, the Cuyama Basin GSA Board of Directors will hold a Public Hearing at **<Time>** at **<Location and Address>** to receive comments on the Final Draft Groundwater Sustainability Plan developed for the Cuyama Basin. Written comments may also be submitted by October 9, 2019, in English or Spanish, by email to tblakslee@hgcpm.com or by U.S. mail to Cuyama Basin GSA, 4900 California Ave, Tower B, 2nd Floor, Bakersfield, CA 93309. The agenda and meeting materials for the October 9 meeting will be available at <http://cuyamabasin.org> 72 hours prior. A special meeting of the Cuyama Basin GSA Standing Advisory Committee will be held at the same time and location.

Based on direction from the Cuyama Basin GSA Board of Directors, comments will be incorporated into the Final GSP. The public comments and the responses will be shared at the CBGSA Board meeting in November and will also be included in an Appendix to the Final GSP. The Cuyama Basin GSA Board is expected to consider adopting the Final GSP at their December 4, 2019 meeting. The Final GSP will be submitted to the Department of Water Resources (DWR) by January 31, 2020. GSP implementation will begin while the DWR reviews the Final GSP.

Review the Final Draft GSP

1. Online at <http://cuyamabasin.org/resources>
2. Spanish and English language versions of the Executive Summary of the Final Draft GSP are also posted online at <http://cuyamabasin.org/resources>
3. Reference hardcopy of the Executive Summaries, courtesy of the Family Resource Center (FRC), are available for review at the FRC, 4689 CA-166 b, New Cuyama, CA 93254. Hours are: Mon-Fri, 9 am to 3:45 pm, phone: 661-766-2369.

Comment on the Final Draft GSP on or Before October 9

1. Written comments, in English and Spanish, by email to tblakslee@hgcpm.com
2. Written comments, in English and Spanish, mailed to Cuyama Basin Groundwater Sustainability Agency, 4900 California Ave, Tower B, 2nd Floor, Bakersfield, CA 93309.
3. Both written and oral comments, in English and in Spanish, will be accepted at the May 1 Community Workshop.

To learn more, visit www.cuyamabasin.org. You can also email us at tblakslee@hgcpm.com.

In compliance with the Americans with Disabilities Act, if you need disability-related modifications or accommodations, including auxiliary aids or services, to participate in these workshops, please contact Taylor Blakeslee at (661) 477-3385 by 4:00 p.m. on the Friday prior to the workshops.



TO: Board of Directors
Agenda Item No. 6h

FROM: Jim Beck, Executive Director

DATE: July 10, 2019

SUBJECT: Set SAC and Board Meetings through January 2020

Issue

Set the Standing Advisory Committee and Board meetings through January 2020.

Recommended Motion

Recommend setting the remaining Groundwater Sustainability Agency Board of Directors and Standing Advisory Committee meetings through January 2020 according to the schedule provided in Agenda Item No. 5av to the Standing Advisory Committee meeting on June 27, 2019.

Discussion

The proposed Cuyama Basin Groundwater Sustainability Agency (CBGSA) Board and Standing Advisory Committee (SAC) meeting calendar through January 2020 is provided as Attachment 1 for consideration of approval.

Cuyama Basin Groundwater Sustainability Agency Draft 2019 Meeting Calendar

BOD

SAC

Cancelled Date

Holiday

August						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

September						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

October						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

November						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

December						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				



TO: Board of Directors
Agenda Item No. 6i

FROM: Charles Gardiner, Catalyst Group

DATE: July 10, 2019

SUBJECT: Stakeholder Engagement Update

Issue

Update on the Cuyama Basin Groundwater Sustainability Agency Groundwater Sustainability Plan stakeholder engagement.

Recommended Motion

None – information only.

Discussion

Cuyama Basin Groundwater Sustainability Agency (CBGSA) Groundwater Sustainability Plan (GSP) outreach consultant the Catalyst Group's stakeholder engagement update is provided as Attachment 1.

ITEM NO. 6I: STAKEHOLDER ENGAGEMENT UPDATE IS NOW A VERBAL REPORT.



TO: Board of Directors
Agenda Item No. 6ii

FROM: Charles Gardiner, Catalyst Group

DATE: July 10, 2019

SUBJECT: 90-Day Public Comment Process

Issue

Overview of the 90-day public comment process.

Recommended Motion

None – information only.

Discussion

The Cuyama Basin Groundwater Sustainability Agency's (CBGSA) Board will consider issuing a Notice of Intent to Adopt the final draft Groundwater Sustainability Plan (GSP) at the July 10, 2019 Board meeting. The Notice Intent to Adopt will start a 90-day public comment period and comments will be accepted leading up to and at a public hearing concluding the 90-day comment period.

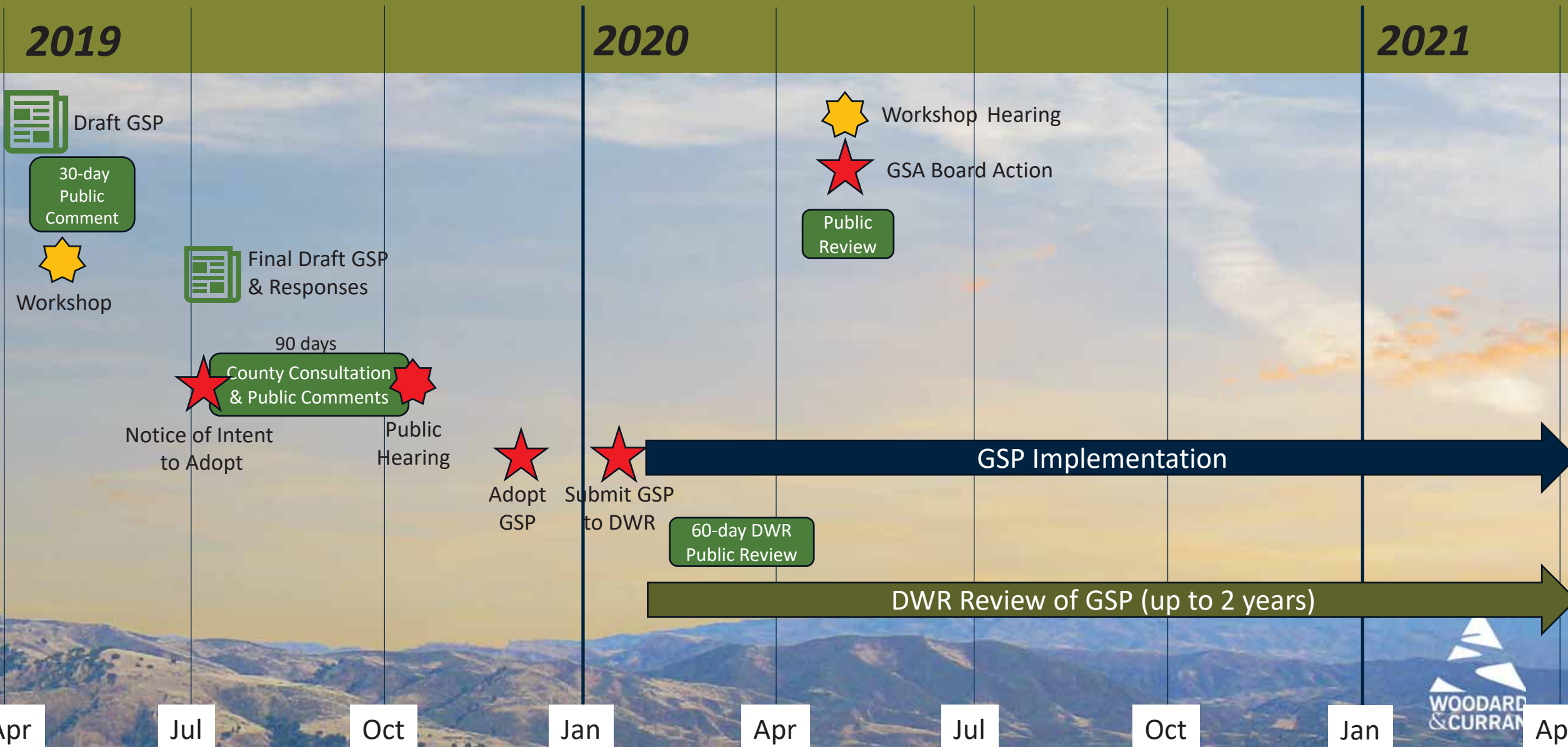
Attachment 1 describes the 90-day public comment process and how to submit comments.

Cuyama Basin Groundwater Sustainability Agency

90-Day Public Comment Process

July 10, 2019

Final Draft GSP Public Review & Adoption Process



Next Steps

- July 10, 2019:** Board accepts Final Draft GSP and issues Notice of Intent to Adopt
- July 10, 2019:** 90-day public comment period starts
- Oct 9, 2019:** 90-day public comment period ends
- Oct 9, 2019:** Public Hearing to receive comments on Final GSP
- Dec 4, 2019:** Board adopts Final GSP
- Jan 31, 2020:** CBGSA submits Final GSP to DWR

Public Comments on Final Draft GSP

- Public Comments on Final Draft GSP will be accepted throughout the 90-day comment period
 - In writing to: CBGSA, 4900 California Ave, Tower B, 2nd Floor, Bakersfield, CA 93309
 - Via email to: tblakslee@hgcpm.com
 - In writing and orally at Public Hearing on Oct 9, 2019 (*pending Board approval*)

Outreach for 90-Day Comment Period and Public Hearing on Final Draft GSP

- Post card mailing to New Cuyama PO Box holders and Parcel owners
 - *Announce 90-day public comment period and public hearing date*
- Email to CBGSA contact list and post to website
- Flyer for distribution throughout the Cuyama Basin
- Biweekly emails to CBGSA Board, SAC, and stakeholders with updated commenter list and link to comments
- Discuss comments received to-date at the Aug 29 SAC and Sep 4, 2019 Board meeting if needed.

Cuyama Basin GSA Standing Advisory Committee Application

Anyone interested in serving on the Advisory Committee for the Cuyama Basin GSA shall complete the following application and return to Robbie Jaffe, Standing Advisory Committee Chair by Wednesday, May 29, 2019.

The Sustainable Groundwater Management Act (SGMA), which required the creation and sets out the mission of the Cuyama Basin GSA, authorizes the creation of an advisory committee by stating the following:

10727.8 Public Notification and Participating; Advisory Committee

(a) Prior to initiating the development of a groundwater sustainability plan, the groundwater sustainability agency shall make available to the public and the department a written statement describing the manner in which interested parties may participate in the development and implementation of the groundwater sustainability plan. The groundwater sustainability agency shall provide the written statement to the legislative body of any city, county, or city and county located within the geographic area to be covered by the plan. The groundwater sustainability agency may appoint and consult with an advisory committee consisting of interested parties for the purposes of developing and implementing a groundwater sustainability plan. The groundwater sustainability agency shall encourage the active involvement of diverse social, cultural, and economic elements of the population within the groundwater basin prior to and during the development and implementation of the groundwater sustainability plan.

(b) For purposes of this section, interested parties include entities listed in Section 10927 that are monitoring and reporting groundwater elevations in all or a part of a groundwater basin managed by the groundwater sustainability agency.

Article 8 of the Cuyama Basin GSA JPA authorizes the creation of a Standing Advisory Committee by stating the following:

8.1 Standing Advisory Committee. A Standing Advisory Committee is hereby established as a group of representatives to advise the GSA, and shall be appointed by the Board.

a) Purpose. The Standing Advisory Committee shall advise the Board concerning, where legally appropriate, implementation of SGMA in the Basin and review the GSP before it is approved by the Board.

b) Membership. The composition of and appointment to the Standing Advisory Committee shall be determined by the Board.

c) Brown Act. All Meetings of the Standing Advisory Committee, including special meetings, shall be noticed, held, and conducted in accordance with the Ralph M. Brown Act (Government Code 54950 et seq).

d) Compensation. No Advisory Committee member shall be compensated by the GSA for preparation for or attendance at meetings of the Board or at any committee created by the Board.



TO: Board of Directors
Agenda Item No. 7c

FROM: Jim Beck, Executive Director

DATE: July 10, 2019

SUBJECT: Progress & Next Steps

Issue

Report on the progress and next steps for Cuyama Basin Groundwater Sustainability Agency activities.

Recommended Motion

None – information only.

Discussion

A presentation on the progress and next steps for Cuyama Basin Groundwater Sustainability Agency activities is provided as Attachment 1.

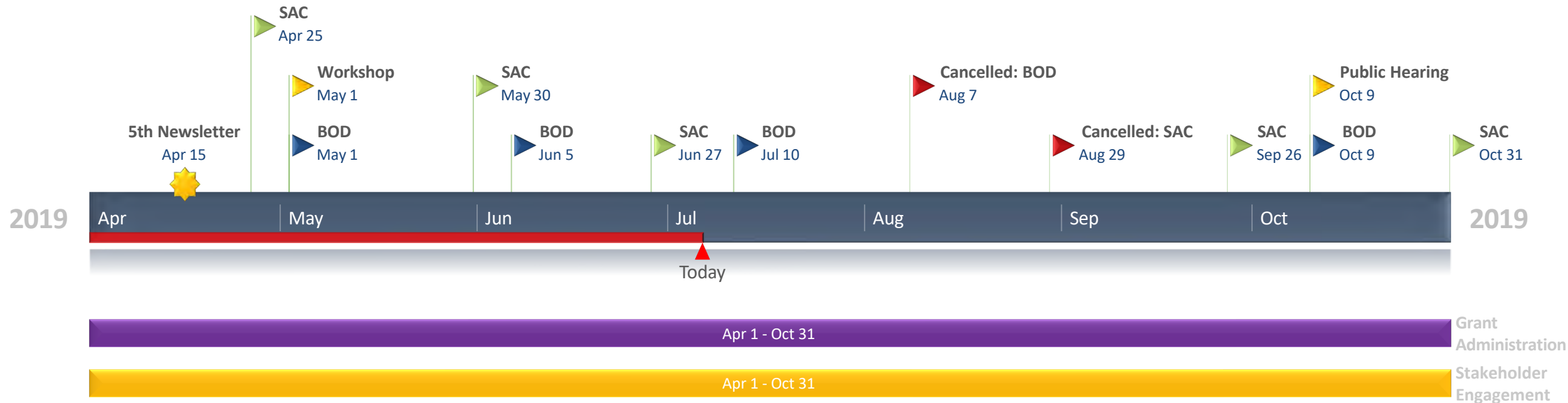
Cuyama Basin Groundwater Sustainability Agency

Progress & Next Steps

July 10, 2019

Cuyama Basin Groundwater Sustainability Agency

Near-Term Schedule



June 2019 Accomplishments & Next Steps

Accomplishments

- ✓ Ongoing administration of the CBGSA
- ✓ Ongoing administration of DWR Grant
- ✓ Processing of Invoice No. 1 to DWR
- ✓ Continued Budget, Cashflow and Cost Allocation refinements
- ✓ Initiated engagement with Audit firm

Next Steps

- Distribute and Post GSP Public Draft
- Administer Public Draft Comments
- Prepare for Public Hearing





TO: Board of Directors
Agenda Item No. 8a

FROM: Taylor Blakslee, Hallmark Group

DATE: July 10, 2019

SUBJECT: Financial Management Overview

Issue

Overview of the financial management for Cuyama Basin Groundwater Sustainability Agency activities.

Recommended Motion

None – information only.

Discussion

A presentation on the financial management for Cuyama Basin Groundwater Sustainability Agency activities is provided as Attachment 1.

Cuyama Basin Groundwater Sustainability Agency

Financial Report

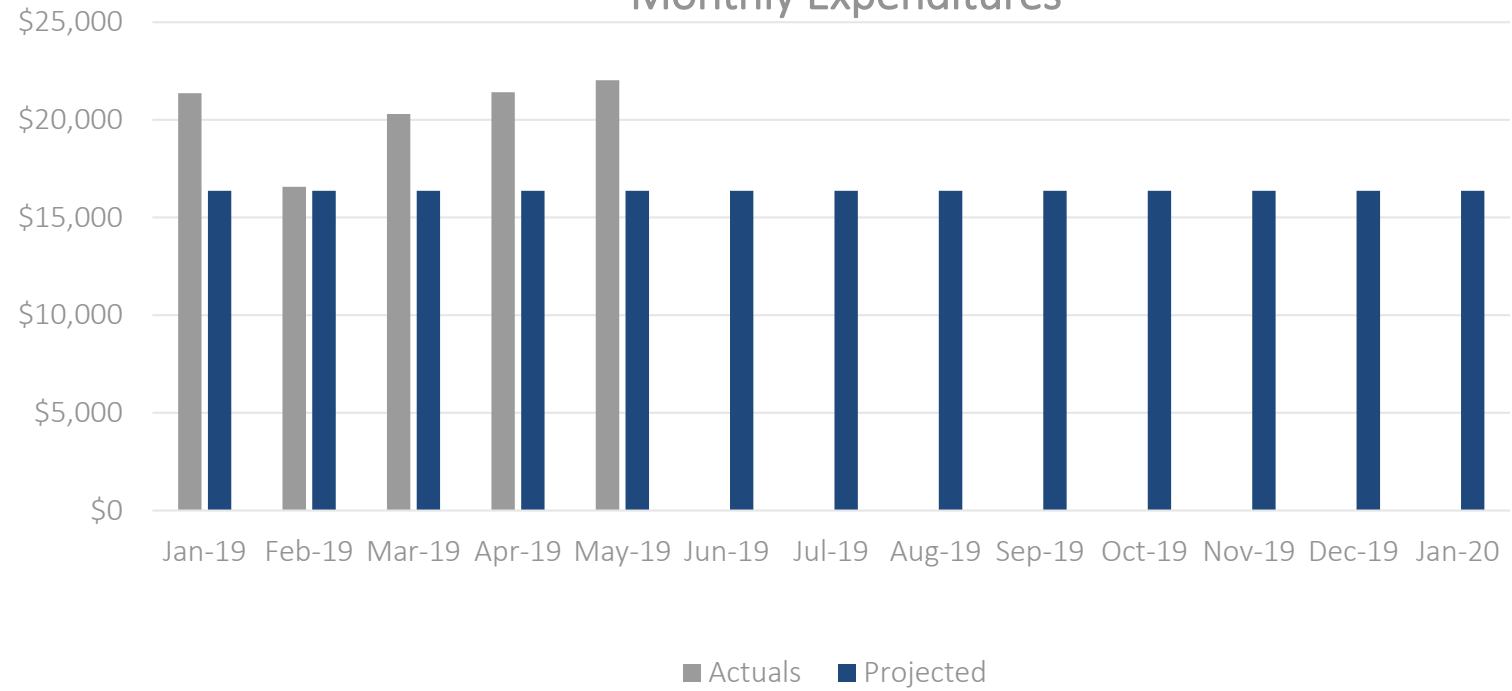
July 10, 2019

CBGSA OUTSTANDING INVOICES

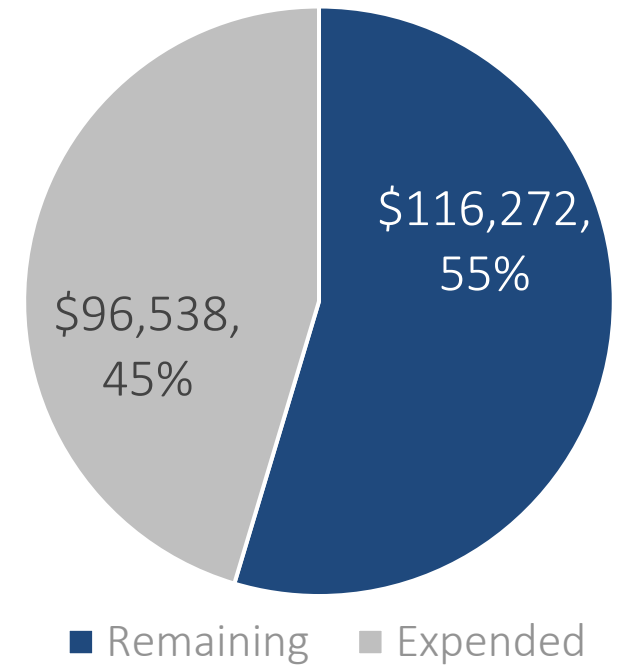
Task	Invoiced Through	Cumulative Total
Legal Counsel	5/20/2019	\$10,545.42
Executive Director	5/31/2019	\$210,924.18
GSP Development	5/31/2019	\$1,221,972.77
TOTAL		\$1,443,442.37

Executive Director Task Order 3

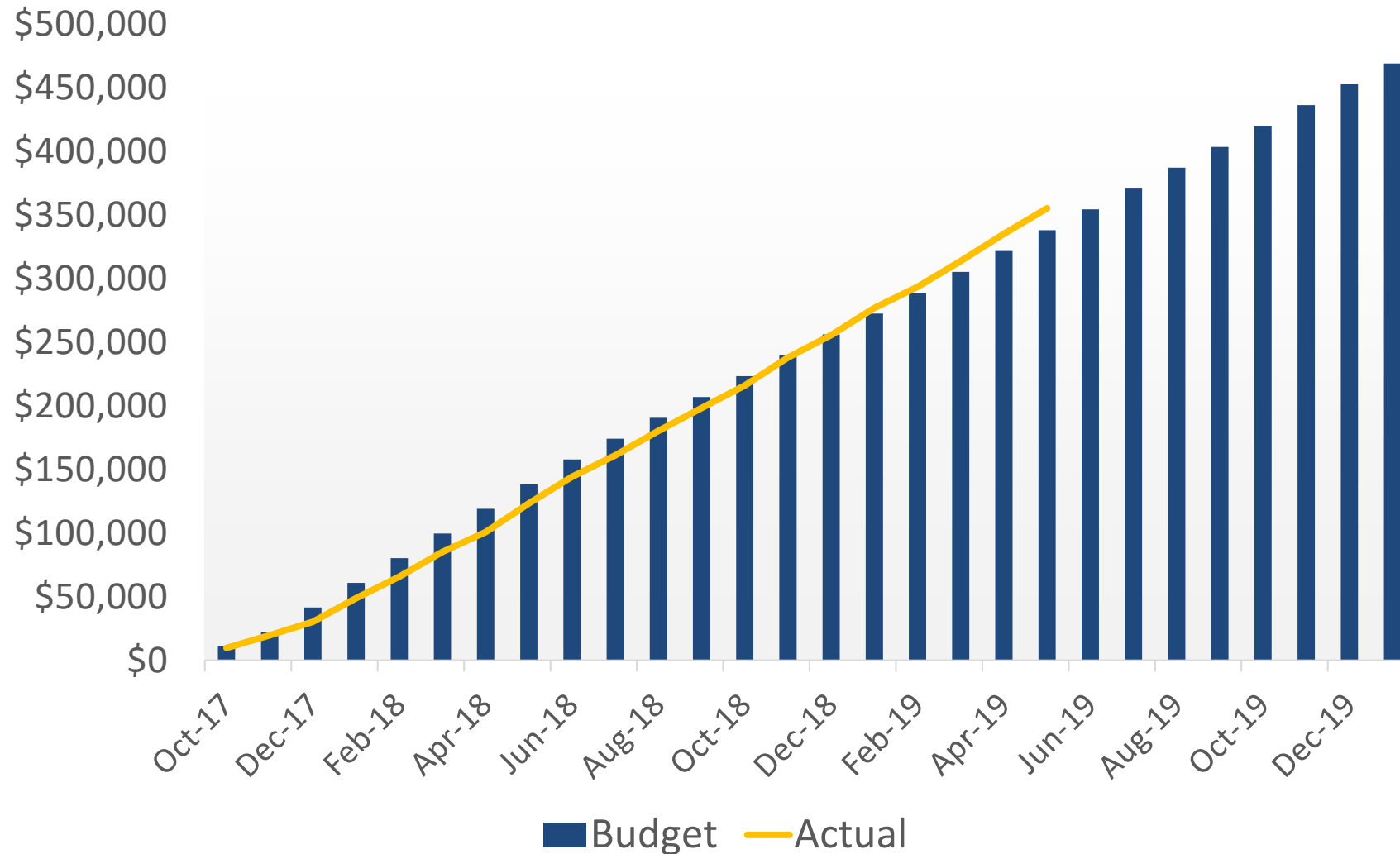
Monthly Expenditures



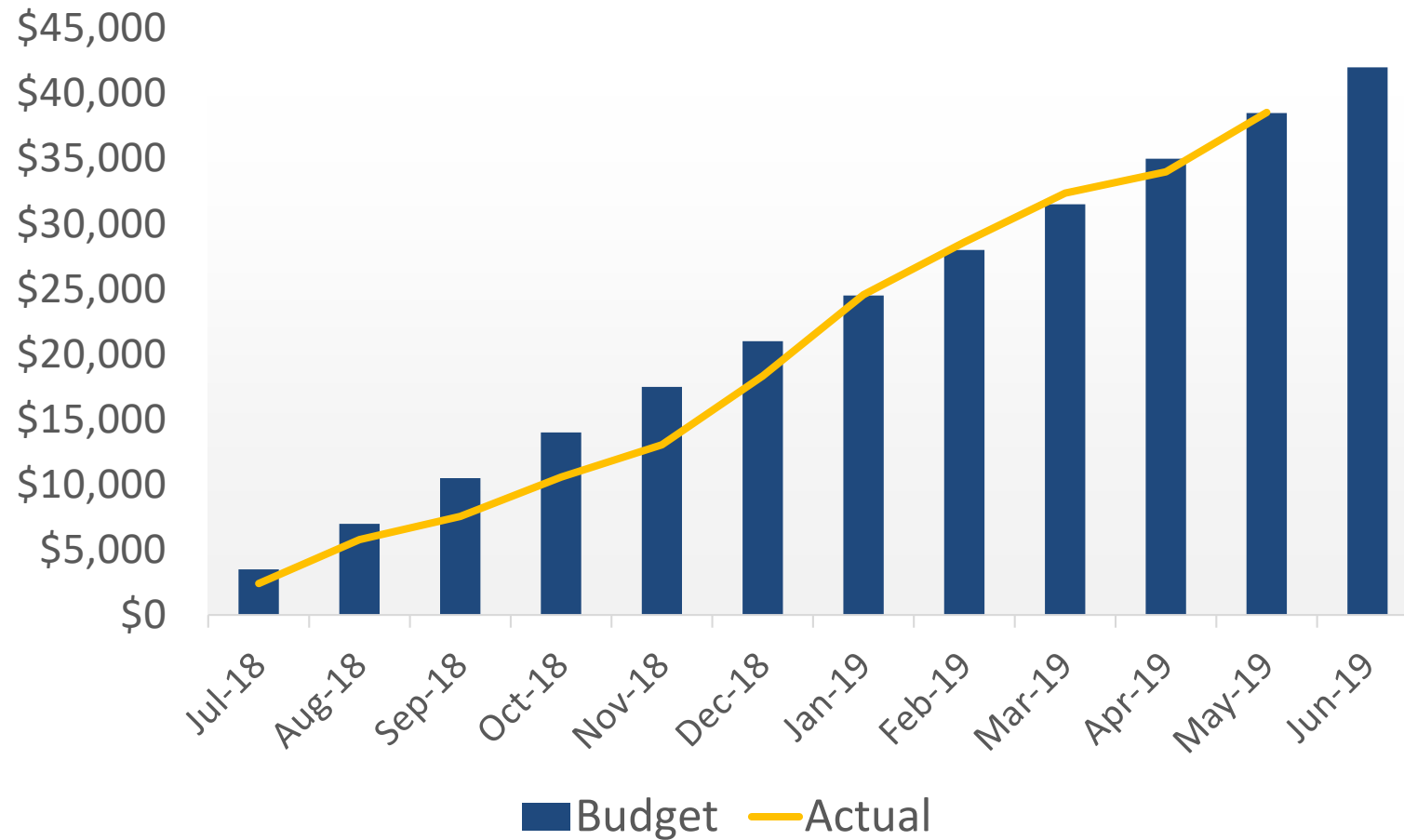
Total Authorized \$212,810
Through 1/31/2020



Task Order Nos. 1-3: Budget to Actual

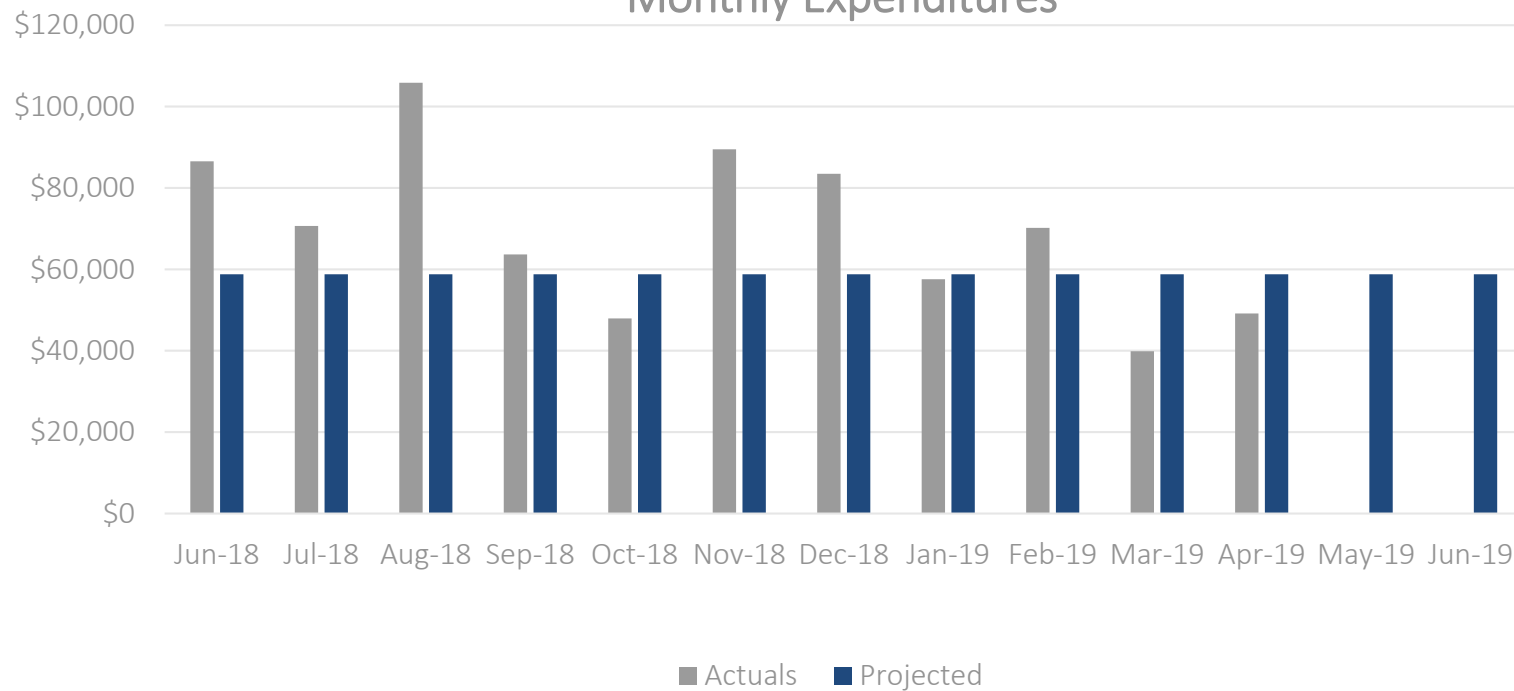


Legal Counsel: Budget to Actual (FY 18-19)

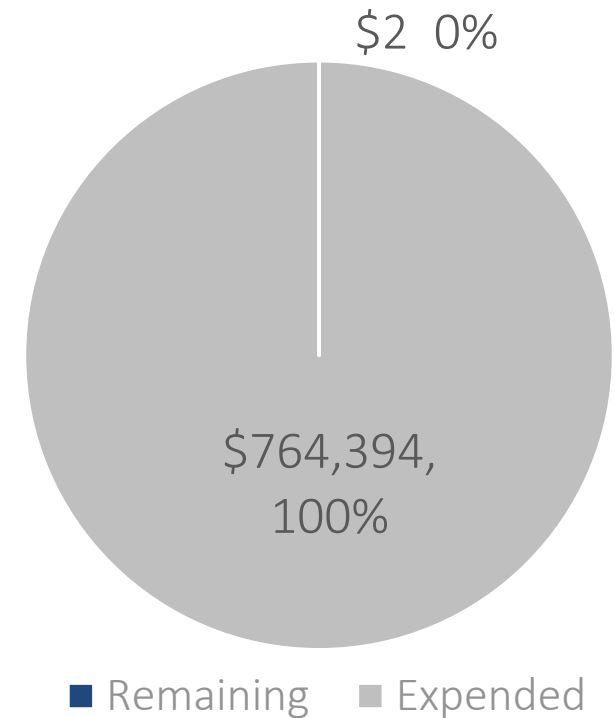


GSP Development Task Order 4

Monthly Expenditures

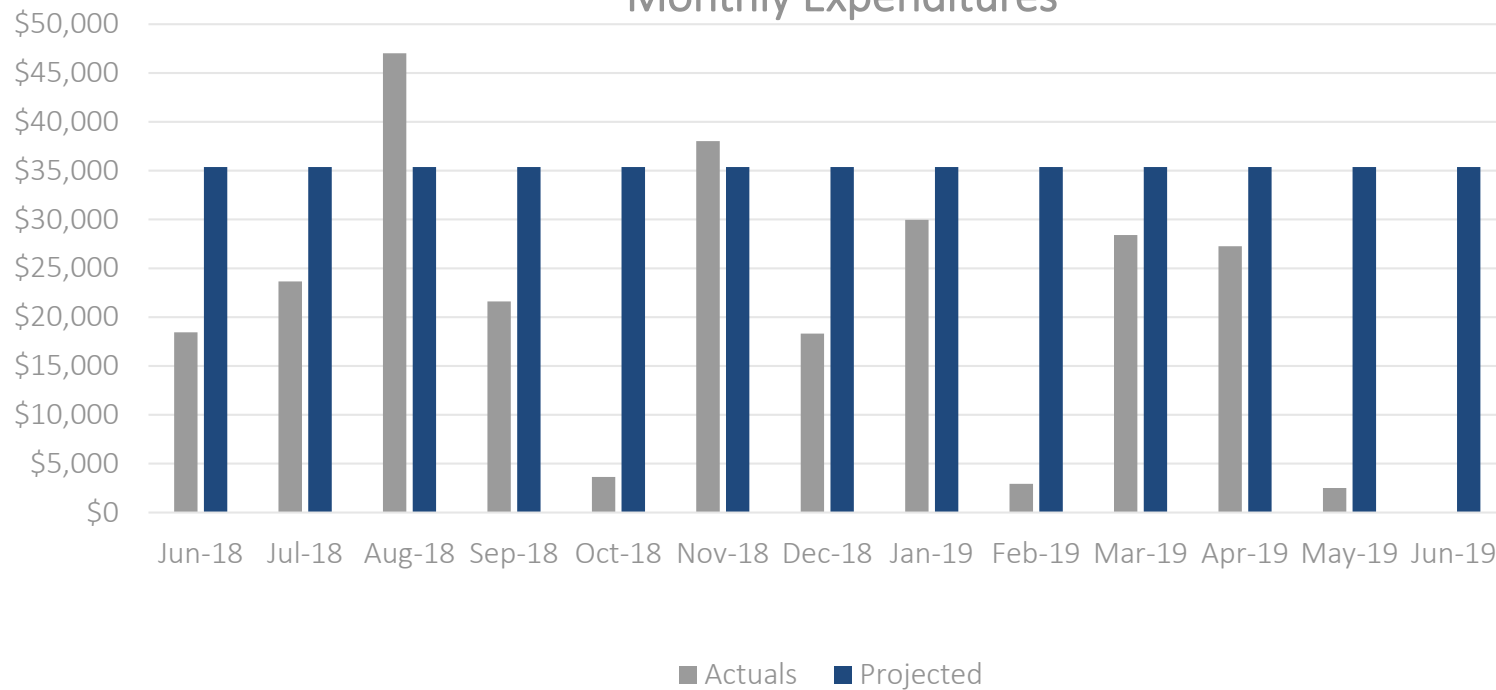


Total Authorized \$764,396
Through 6/30/2019

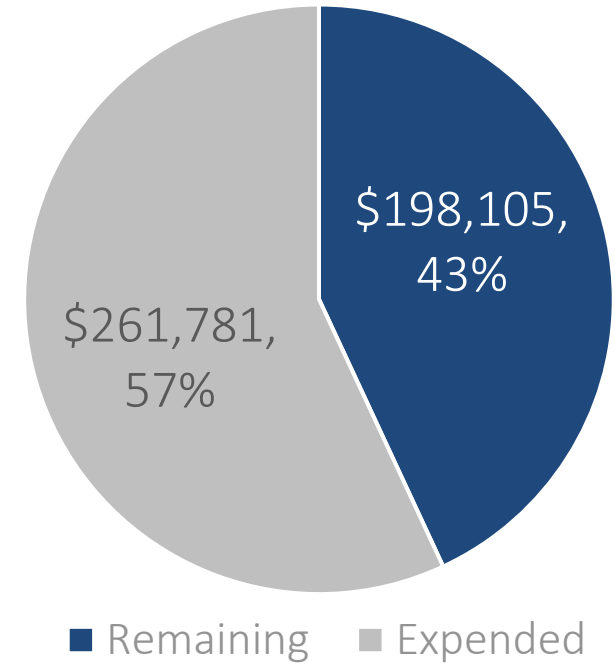


GSP Development Task Order 5

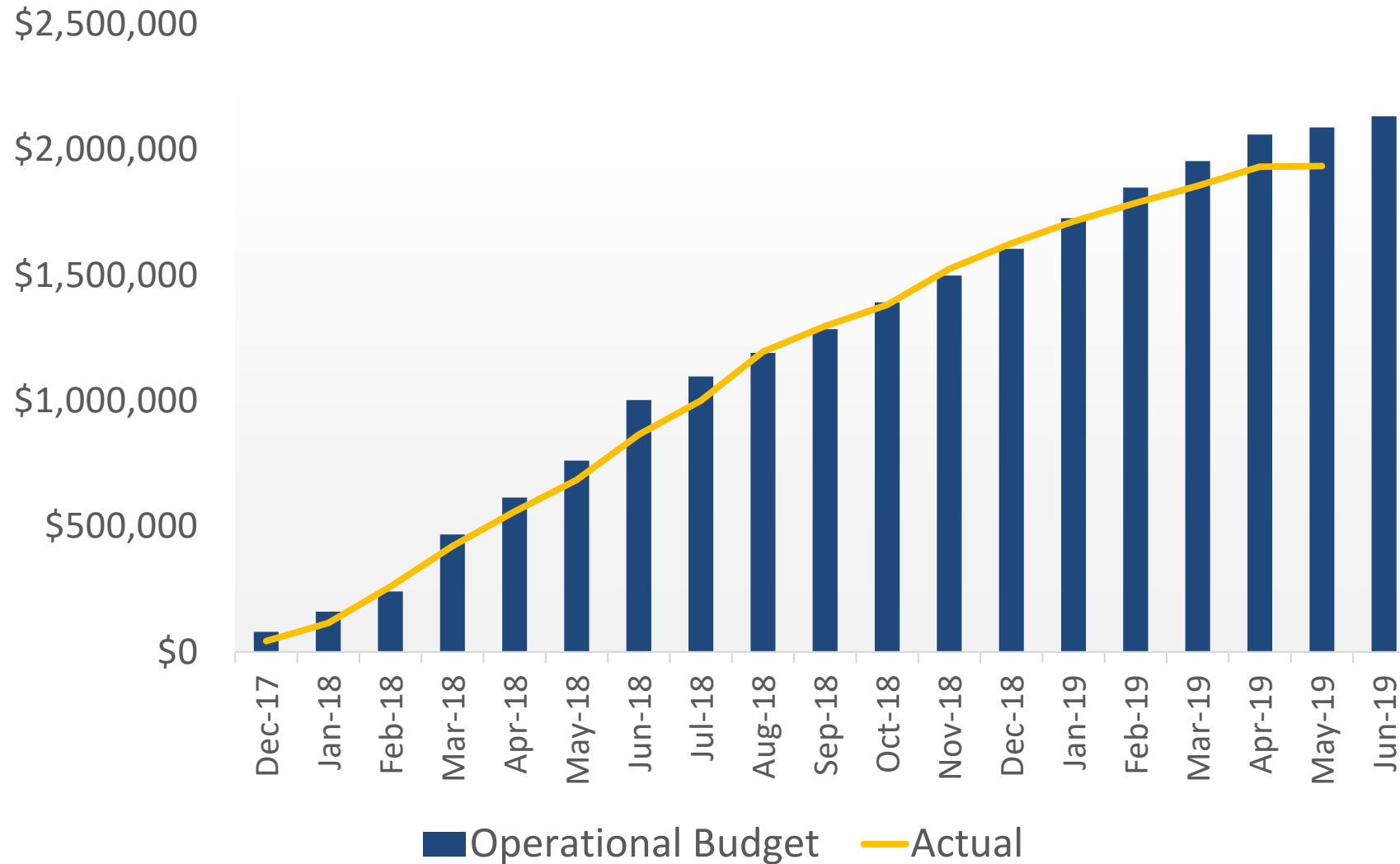
Monthly Expenditures



Total Authorized \$459,886
Through 6/30/2019



W&C Budget - Operational





TO: Board of Directors
Agenda Item No. 8b

FROM: Taylor Blakslee, Hallmark Group

DATE: July 10, 2019

SUBJECT: Financial Report

Issue

Financial Report

Recommended Motion

None – information only.

Discussion

The Cuyama Basin Groundwater Sustainability Agency's financial report is provided as Attachment 1.

The report includes:

- Statement of Financial Position, *as of May 31, 2019*
- Receipts and Disbursements, *as of May 31, 2019*
- A/P Aging Summary, *as of May 31, 2019*
- Statement of Operations with Budget Variance, *July 2018 through May 2019*
- 2018/2019 Operational Budget, *July 2018 through June 2019*



Cuyama Basin GSA

Financial Statements

May 2019

CUYAMA BASIN GSA
Statement of Financial Position
As of May 31, 2019

	May 31, 19
ASSETS	
Current Assets	
Checking/Savings	
Chase - General Checking	28,395
Total Checking/Savings	28,395
Total Current Assets	28,395
TOTAL ASSETS	28,395
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	1,415,443
Total Accounts Payable	1,415,443
Total Current Liabilities	1,415,443
Total Liabilities	1,415,443
Equity	
Unrestricted Net Assets	-110,130
Net Income	-1,276,917
Total Equity	-1,387,047
TOTAL LIABILITIES & EQUITY	28,395

CUYAMA BASIN GSA
Receipts and Disbursements
As of May 31, 2019

Type	Date	Num	Name	Debit	Credit
Chase - General Checking					
Payment	07/02/2018	11366440	County of Kern	38,567.66	
Payment	07/05/2018	1001819148	County of Ventura	18,451.08	
Payment	07/05/2018	1039	Cuyama Basin Water District	387,307.44	
Payment	07/09/2018	9706702	Santa Barbara County Water Agency	56,306.25	
Payment	07/16/2018	10575	Cuyama Community Services District	3,251.50	
Bill Pmt -Check	07/18/2018	1006	HGCPM, Inc.		80,730.24
Bill Pmt -Check	07/18/2018	1007	Klein, DeNatale, Goldner		18,598.06
Bill Pmt -Check	07/18/2018	1008	Woodard & Curran		394,461.11
Payment	08/31/2018	10615	Cuyama Community Services District	2,982.30	
Check	09/30/2018	Fees	Chase Bank		95.00
Check	10/31/2018	Fees	Chase Bank		95.00
Check	11/30/2018	Fees	Chase Bank		95.00
Check	12/13/2018	1009	Santa Barbara County Water Agency		3,718.75
Check	12/31/2018	Fees	Chase Bank		95.00
Check	01/31/2019	Fees	Chase Bank		95.00
Check	02/05/2019	Fees	Chase Bank		95.00
Payment	02/12/2019	2613575	County of San Luis Obispo	38,567.66	
Check	03/05/2019	Fees	Chase Bank		95.00
Bill Pmt -Check	03/12/2019	1010	Insurica		9,315.00
Bill Pmt -Check	03/12/2019	1011	CA Assoc of Mutual Water Companies		100.00
Check	04/05/2019	Fees	Chase Bank		95.00
Payment	04/09/2019	9723381	Santa Barbara County Water Agency	52,273.13	
Check	04/16/2019	1012	Santa Barbara County Water Agency		3.13
Check	05/03/2019	Fees	Chase Bank		95.00
Bill Pmt -Check	05/22/2019	1013	HGCPM, Inc.		28,000.00
Bill Pmt -Check	05/22/2019	1014	Klein, DeNatale, Goldner		28,000.00
Bill Pmt -Check	05/22/2019	1015	Woodard & Curran		28,000.00
Total Chase - General Checking				597,707.02	591,781.29
TOTAL				597,707.02	591,781.29

CUYAMA BASIN GSA
A/P Aging Summary
As of May 31, 2019

	<u>Current</u>	<u>1 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>> 90</u>	<u>TOTAL</u>
HGCPM, Inc.	20,029	21,409	20,302	16,572	104,613	182,924
Klein, DeNatale, Goldner	4,552	1,635	3,769	589	0	10,545
Woodard & Curran	2,502	76,406	68,280	73,094	1,001,692	1,221,973
TOTAL	<u>27,084</u>	<u>99,449</u>	<u>92,351</u>	<u>90,255</u>	<u>1,106,304</u>	<u>1,415,443</u>

CUYAMA BASIN GSA
Statement of Operations with Budget Variance
July 2018 through May 2019

	Jul '18 - May 19	Budget	\$ Over Budget	% of Budget
Ordinary Income/Expense				
Income				
Direct Public Funds				
Grants	0	1,555,427	-1,555,427	0%
Participant Assessments	52,270	0	52,270	100%
Total Direct Public Funds	52,270	1,555,427	-1,503,157	3%
Total Income	52,270	1,555,427	-1,503,157	3%
Cost of Goods Sold				
Program Expenses				
Category/Component 1				
Monitoring/AMP Implementation	326,160	433,938	-107,778	75%
Grant Administration	0	11,648	-11,648	0%
Total Category/Component 1	326,160	445,586	-119,426	73%
Category/Component 2				
GSP Development	743,288	815,651	-72,363	91%
Grant Administration	0	22,608	-22,608	0%
Total Category/Component 2	743,288	838,259	-94,971	89%
Total Program Expenses	1,069,447	1,283,845	-214,398	83%
Total COGS	1,069,447	1,283,845	-214,398	83%
Gross Profit	-1,017,177	271,582	-1,288,759	-375%
Expense				
Administration and Operation				
Administrative Overhead				
Bank Service Fees	855	0	855	100%
General Liability Insurance	9,315	12,108	-2,793	77%
Legal	38,545	38,500	45	100%
Other Admin Expense	100	1,830	-1,730	5%
Postage and Mailing Services	0	18,000	-18,000	0%
Travel, Conferences, Trainings	0	4,580	-4,580	0%
Total Administrative Overhead	48,815	75,018	-26,203	65%
Administration of GSA				
Executive Director				
GSA BOD Meetings	114,713	47,850	66,863	240%
Consult Mgmt and GSP Devel	30,113	40,150	-10,038	75%
Financial Information Coord	30,350	9,350	21,000	325%
CBGSA Outreach	12,825	24,200	-11,375	53%
Budget Devel and Admin	125	6,700	-6,575	2%
Outreach Facilitation	7,150	14,850	-7,700	48%
Financial Management	9,225	32,400	-23,175	28%
Travel and Direct Costs	6,424	2,585	3,839	249%
Total Executive Director	210,924	178,085	32,839	118%
Total Administration of GSA	210,924	178,085	32,839	118%
Total Administration and Operation	259,740	253,103	6,637	103%
Total Expense	259,740	253,103	6,637	103%
Net Ordinary Income	-1,276,917	18,479	-1,295,396	-6,910%
Net Income	-1,276,917	18,479	-1,295,396	-6,910%

CUYAMA BASIN GSA
2018/2019 Operational Budget
 July 2018 through June 2019

	Jul '18 - Jun 19
Ordinary Income/Expense	
Income	
Direct Public Funds	
Grants	1,966,858
Total Direct Public Funds	1,966,858
Total Income	1,966,858
Cost of Goods Sold	
Program Expenses	
Category/Component 1	
Monitoring/AMP Implementation	472,989
Grant Administration	13,104
Total Category/Component 1	486,093
Category/Component 2	
GSP Development	889,032
Grant Administration	25,434
Total Category/Component 2	914,466
Total Program Expenses	1,400,559
Total COGS	1,400,559
Gross Profit	566,299
Expense	
Administration and Operation	
Administrative Overhead	
General Liability Insurance	12,108
Legal	42,000
Other Admin Expense	2,000
Postage and Mailing Services	20,000
Travel, Conferences, Trainings	5,000
Total Administrative Overhead	81,108
Administration of GSA	
Executive Director	
GSA BOD Meetings	52,200
Consult Mgmt and GSP Devel	43,800
Financial Information Coor	10,200
CBGSA Outreach	26,400
Budget Devel and Admin	6,700
Outreach Facilitation	16,200
Financial Management	38,120
Travel and Direct Costs	2,820
Total Executive Director	196,440
Total Administration of GSA	196,440
Total Administration and Operation	277,548
Total Expense	277,548
Net Ordinary Income	288,751
Net Income	288,751



TO: Board of Directors
Agenda Item No. 8c

FROM: Jim Beck, Executive Director

DATE: July 10, 2019

SUBJECT: Payment of Bills

Issue

Consider approving the payment of bills for May 2019.

Recommended Motion

Approve payment of the bills through the month of May 2019 in the amount of \$27,083.58.

Discussion

Consultant invoices for the month of May 2019 are provided as Attachment 1.



INVOICE

1901 Royal Oaks Drive
Suite 200
Sacramento, CA 95815

916 923.1500
hgcpm.com

To: Cuyama Basin GSA
c/o Jim Beck
4900 California Avenue, Ste B
Bakersfield, CA 93309

Please Remit To: Hallmark Group
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815
P: (916) 923-1500

Invoice No.: 2019-CB-TO3-05
Task Order: CB-HG-003
Agreement No.: 201709-CB-001
Date: June 14, 2019

For professional services rendered for the month of May 2019

Task Order	Sub Task	Task Description	Billing Classification	Hours	Rate	Amount
CB-HG-003	1	GSA Board of Directors and Advisory Committee Meetings	Executive Director	16.50	\$ 250.00	\$ 4,125.00
			Project Coordinator/Admin	43.75	\$ 100.00	\$ 4,375.00
Total Sub Task 1 Labor						\$ 8,500.00
CB-HG-003	2	Consultant Management and GSP Development	Executive Director	3.00	\$ 250.00	\$ 750.00
			Project Coordinator/Admin	17.25	\$ 100.00	\$ 1,725.00
Total Sub Task 2 Labor						\$ 2,475.00
CB-HG-003	3	Financial Information Coordination	Executive Director	9.75	\$ 250.00	\$ 2,437.50
			Project Controls	5.75	\$ 200.00	\$ 1,150.00
			Project Coordinator/Admin	28.50	\$ 100.00	\$ 2,850.00
Total Sub Task 3 Labor						\$ 6,437.50
CB-HG-003	4	CBGSA Outreach	Executive Director	4.50	\$ 250.00	\$ 1,125.00
			Project Coordinator/Admin	8.25	\$ 100.00	\$ 825.00
Total Sub Task 4 Labor						\$ 1,950.00
Total Labor						\$ 19,362.50
		Travel	05/01/19, 05/28/19			\$ 135.16
		Other Direct Costs:	Conference Calls			\$ 426.61
			Printing Costs			\$ 79.60
SubTotal Travel and Other Direct Costs						\$ 641.37
ODC Mark Up					5%	\$ 25.31
Total Travel and Other Direct Costs						\$ 666.68
TOTAL AMOUNT DUE FOR THIS INVOICE						\$ 20,029.18

Task Order	Original Totals	Amendment(s)	Total Committed	Previously Billed	Current Billing	Remaining Balance
CB-HG-003	\$ 212,810.00	\$ -	\$ 212,810.00	\$ 77,175.00	\$ 19,362.50	\$ 116,272.50
Travel and ODC	\$ -	\$ -	\$ -	\$ 2,467.35	\$ 666.68	\$ (3,134.03)
Total	\$ 212,810.00	\$ -	\$ 212,810.00	\$ 79,642.35	\$ 20,029.18	\$ 113,138.47

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

PROGRESS REPORT FOR TASK ORDER CB-HG-003

Client Name:	Cuyama Basin Groundwater Sustainability Agency	Agreement Number:	201709-CB-001
Company Name:	HGCPM, Inc. DBA The Hallmark Group	Address:	1901 Royal Oaks Drive, Suite 200 Sacramento, CA 95815
Task Order Number:	CB-HG-003	Report Period:	May 1-31, 2019
Progress Report Number:	5	Project Manager:	Jim Beck
Invoice Number:	2019-CB-T03-05	Invoice Date:	June 14, 2019

SUMMARY OF WORK PERFORMED

Task 1: Board and Standing Advisory Committee Meeting Facilitation

- Prepared for and attended monthly Cuyama Basin Groundwater Sustainability Agency (CBGSA) Standing Advisory Committee (SAC) and Board meetings.
- Drafted, prepared, and distributed documents for the CBGSA SAC and Board of Directors meeting packets.
- Drafted CBGSA SAC and Board minutes.
- Drafted, reviewed, and discussed SAC and Board agendas.

Task 2: GSP Consultant Management and GSP Development

- Prepared for, met with, and facilitated CBGSA Program Management Team (PMT) on a weekly basis to discuss Groundwater Sustainability Plan (GSP) section progress and outreach.
- Tracked, logged and coordinated 30-day Groundwater Sustainability Plan (GSP) comments with Woodard & Curran (W&C).
- Discussed economic model with M. Klinchuch.
- Discussed EKI presentation on model uncertainty with EKI's J. Shaw and legal counsel J. Hughes.
- Discussed grant administration update with W&C's B. Van Lienden.

Task 3: Financial Management

- Communicated with accounting firms for CBGSA audit proposals.
- Coordinated, prepared for, and attended Budget Ad Hoc calls on May 13, 2019 and May 30, 2019.
- Coordinated, prepared for, and attended budget discussion with W&C on May 9, 2019.
- Coordinated, prepared for, and attended budget discussion with W&C and CBGSA Board Chair on May 17, 2019

- Discussed Grant Admin progress report process and expenses with the California Department of Water Resource's (DWR) A. Regmi and W&C staff.
- Discussed Prop 68 with DWR's A. Regmi and W&C's B. Van Lienden.
- Submitted the Prop 1 SGWP Grant Progress Report No. 2.
- Updated budget assumptions and cost allocation tool.
- Reviewed audit proposals.

Task 4: Stakeholder Outreach Facilitation

- Coordinated the update of the Cuyama Basin Groundwater Sustainability Agency (CBGSA) website with Board and Standing Advisory Committee minutes, agendas, GSP chapters, and GSP presentations.
- Prepared for, attended, and helped facilitate the CBGSA public workshop on May 1, 2019.
- Developed and distributed draft CBGSA GSP comments and commenters list to stakeholders.
- Updated CBGSA public stakeholder contact list.

DELIVERABLES AND COMPLETED TASKS

- Developed CBGSA Board agenda for May 1, 2019 and SAC agenda for May 30, 2019.
- Attended CBGSA Board meeting and public workshops on May 1, 2019 and SAC meeting on May 30, 2019.
- Drafted meeting minutes for CBGSA Board meeting on May 1, 2019 and SAC meeting on May 30, 2019.
- Prepared for, met with, and facilitate CBGSA program management team on a weekly basis.

PLANNED OBJECTIVES FOR NEXT REPORTING PERIOD

- Prepare for and attend CBGSA Board meeting on June 5, 2019 and SAC meeting on June 27, 2019.

SIGNIFICANT ISSUES OR CHALLENGES (IF ANY) AND POTENTIAL RESOLUTIONS

- N/A

Project and Person Summary with Expense Detail

Date Range: 5/1/2019 - 5/31/2019

<i>Client</i>	<i>Project</i>	<i>Person</i>	<i>Expense Type</i>	<i>Date</i>	<i>Description</i>	<i>Mileage</i>	<i>Amount</i>
Cuyama Basin Groundwater Sustainability Agency							
	1708-CBGSA ED		CBGSA Executive Director Services				
		Taylor Blakslee					\$641.37
			<i>Mileage</i>			248.00	\$135.16
				5/1/2019	Mileage to Cuyama from Bakersfield (RT) - Board	124.00	\$67.58
				5/28/2019	Mileage to Cuyama from Bakersfield (RT) - SAC	124.00	\$67.58
			<i>Supplies</i>				\$79.60
				5/31/2019	Printing costs for Board packets, etc.		\$79.60
			<i>Telephone</i>				\$426.61
				5/31/2019	Conference line charges.		\$426.61
					CBGSA Executive Director Services Subtotal		\$641.37
					Cuyama Basin Groundwater Sustainability Agency Subtotal		\$641.37
					Grand Total		\$641.37


Invoice Date: 6/1/2019
Total: \$713.97

Statement# 39824 Customer# 3122729

HGCPM, Inc. - Formerly Advance Education
1901 Royal Oaks Dr
STE 200
Sacramento, CA 95815 -4235

Remit to:
Great America Networks Conferencing
1441 Branding Lane
Suite 200
Downers Grove, IL 60515 0000

CALL US
 1-877-438-4261

Summary

Balance Information	
Previous Balance	(298.21)
Balance Forward	(298.21)
New Charges	
New Usage Charges	852.00
Recurring Charges	0.00
Taxes and Surcharges	160.18
Total New Charges	1,012.18
Total Amount Due	713.97

Taxes and Surcharges

Federal Universal Service Fund	160.18
Subtotal	\$160.18

Management Reports

Usage by Category

Description	Calls	Minutes	Charge
Usage - Conference Calling	282	17,040.00	852.00
	282.00	17,040.00	852.00

Long Distance By Line

TN	Calls	Mins	Charge
282		17,040.00	852.00
282		17,040.00	852.00

Toll-free Usage

Cuyama BDSAC Conference ID: 4816024

#	Date	Time	Other	Location	Mins	Amt
1	05/01/19	04:54P	8056802226	Host	10.00	.50
2	05/01/19	04:58P	8057815275	Host	201.00	10.05
3	05/01/19	04:59P	6613804816	Participant	241.00	12.05
4	05/01/19	04:59P	8053181713	Host	75.00	3.75
5	05/01/19	04:59P	8057484033	Host	185.00	9.25
6	05/01/19	05:00P	6617662369	Host	199.00	9.95
7	05/01/19	05:02P	6502929100	Participant	1.00	.05
8	05/01/19	05:02P	6502929100	Participant	197.00	9.85
9	05/01/19	05:10P	8056802226	Host	189.00	9.45
10	05/01/19	06:12P	8056377711	Host	13.00	.65
11	05/01/19	06:34P	8053181713	Host	34.00	1.70
12	05/01/19	07:08P	8053181713	Host	70.00	3.50
Subtotal			1,415.00			70.75

Cuyama BDSAC Conference ID: 4829186

#	Date	Time	Other	Location	Mins	Amt
1	05/13/19	04:42P	5596361166	Host	150.00	7.50
2	05/13/19	04:57P	6614773385	Host	135.00	6.75
3	05/13/19	04:57P	9256274112	Host	135.00	6.75
4	05/13/19	04:58P	8056160470	Host	135.00	6.75
5	05/13/19	04:59P	6613337091	Host	133.00	6.65
6	05/13/19	04:59P	6613638463	Host	50.00	2.50
7	05/13/19	04:59P	8056814200	Host	90.00	4.50
8	05/13/19	04:59P	8313855316	Host	133.00	6.65
9	05/13/19	05:00P	8056802226	Host	95.00	4.75
10	05/13/19	05:00P	9169998777	Host	108.00	5.40
11	05/13/19	06:56P	9258581340	Host	8.00	.40
Subtotal			1,172.00			58.60

Cuyama BDSAC Conference ID: 4837277

#	Date	Time	Other	Location	Mins	Amt
1	05/20/19	03:29P	6613302610	Host	29.00	1.45
2	05/20/19	03:31P	6613337091	Host	6.00	.30
3	05/20/19	03:31P	8318182451	Host	28.00	1.40
4	05/20/19	03:36P	6613337091	Host	23.00	1.15
5	05/20/19	03:36P	6614773385	Host	23.00	1.15
6	05/20/19	03:40P	8058867239	Host	19.00	.95
Subtotal			128.00			6.40

Cuyama BDSAC Conference ID: 4847921

#	Date	Time	Other	Location	Mins	Amt
1	05/30/19	11:58A	6613337091	Host	72.00	3.60
2	05/30/19	11:58A	9256274112	Host	71.00	3.55
3	05/30/19	11:59A	8056814200	Host	71.00	3.55
4	05/30/19	12:00P	5596361166	Host	69.00	3.45
5	05/30/19	12:00P	8056160470	Host	69.00	3.45

6	05/30/19	12:00P	8056802226	Host	69.00	3.45
7	05/30/19	12:02P	6614773385	Host	68.00	3.40
8	05/30/19	12:02P	6617662100	Host	68.00	3.40
9	05/30/19	12:03P	5304058800	Host	29.00	1.45
10	05/30/19	12:15P	6615498123	Host	55.00	2.75
11	05/30/19	12:33P	5304058800	Host	37.00	1.85
Subtotal			678.00			33.90

Cuyama BDSAC Conference ID: 4848679

#	Date	Time	Other	Location	Mins	Amt
1	05/30/19	05:56P	9169998760	Host	3.00	.15
2	05/30/19	05:57P	6615564542	Participant	3.00	.15
3	05/30/19	05:58P	4157938420	Host	5.00	.25
4	05/30/19	05:58P	9254872099	Participant	211.00	10.55
5	05/30/19	05:59P	8184814388	Host	211.00	10.55
6	05/30/19	05:59P	9169998760	Host	119.00	5.95
7	05/30/19	06:00P	6615564542	Participant	113.00	5.65
8	05/30/19	06:00P	6617662369	Host	209.00	10.45
9	05/30/19	06:02P	9256274112	Host	106.00	5.30
10	05/30/19	06:03P	4157938420	Host	2.00	.10
11	05/30/19	06:06P	4155242290	Host	61.00	3.05
12	05/30/19	06:06P	4157938420	Host	117.00	5.85
13	05/30/19	07:57P	9169998760	Host	73.00	3.65
14	05/30/19	08:04P	4157938420	Host	84.00	4.20
Subtotal			1,317.00			65.85

Cuyama GSA Conference ID: 0

#	Date	Time	Other	Location	Mins	Amt
1	05/06/19	12:01P	9258581340	Host	1.00	.05
2	05/10/19	11:59A	4155242290	Host	1.00	.05
Subtotal			2.00			.10

Cuyama GSA Conference ID: 4819912

#	Date	Time	Other	Location	Mins	Amt
1	05/06/19	11:59A	6614773385	Host	71.00	3.55
2	05/06/19	12:00P	9169998777	Host	70.00	3.50
3	05/06/19	12:01P	4155242290	Host	69.00	3.45
4	05/06/19	12:01P	4157938420	Host	49.00	2.45
5	05/06/19	12:01P	9258581340	Host	10.00	.50
6	05/06/19	12:02P	6613951000	Host	38.00	1.90
7	05/06/19	12:03P	6613337091	Host	67.00	3.35
8	05/06/19	12:11P	9256274112	Host	59.00	2.95
Subtotal			433.00			21.65

Cuyama GSA Conference ID: 4826049

#	Date	Time	Other	Location	Mins	Amt
1	05/09/19	04:58P	9258581340	Host	32.00	1.60
2	05/09/19	04:59P	6613337091	Host	32.00	1.60
3	05/09/19	05:00P	6614773385	Host	30.00	1.50
4	05/09/19	05:00P	9169998777	Host	31.00	1.55
Subtotal			125.00			6.25

Cuyama GSA Conference ID: 4826979

#	Date	Time	Other	Location	Mins	Amt
1	05/10/19	11:59A	4155242290	Host	61.00	3.05
2	05/10/19	11:59A	6613337091	Host	62.00	3.10
3	05/10/19	12:00P	6614773385	Host	61.00	3.05
4	05/10/19	12:00P	9169998777	Host	61.00	3.05
5	05/10/19	12:00P	9256274112	Host	60.00	3.00
Subtotal			305.00			15.25

Cuyama GSA Conference ID: 4835144

#	Date	Time	Other	Location	Mins	Amt
1	05/17/19	11:28A	9256274112	Host	29.00	1.45
2	05/17/19	11:29A	6613337091	Host	29.00	1.45
3	05/17/19	11:29A	9167088767	Host	29.00	1.45
4	05/17/19	11:53A	6613196477	Host	23.00	1.15
5	05/17/19	11:59A	6614773385	Host	60.00	3.00
6	05/17/19	12:00P	4157938420	Host	59.00	2.95
7	05/17/19	12:00P	6613337091	Host	56.00	2.80
8	05/17/19	12:00P	9169998777	Host	59.00	2.95
9	05/17/19	12:01P	9256274112	Host	58.00	2.90
10	05/17/19	12:06P	4155242290	Host	53.00	2.65
11	05/17/19	12:16P	6613951000	Host	43.00	2.15
Subtotal			498.00			24.90

Cuyama GSA Conference ID: 4835692

#	Date	Time	Other	Location	Mins	Amt
---	------	------	-------	----------	------	-----

1	05/17/19	03:27P	9256274112	Host	26.00	1.30
2	05/17/19	03:29P	6613302610	Host	24.00	1.20
3	05/17/19	03:30P	6613337091	Host	24.00	1.20
4	05/17/19	03:30P	9167088767	Host	23.00	1.15
Subtotal			97.00			4.85

Cuyama GSA Conference ID: 4843096

#	Date	Time	Other	Location	Mins	Amt
1	05/24/19	11:56A	4157938420	Host	117.00	5.85
2	05/24/19	12:00P	6613337091	Host	108.00	5.40
3	05/24/19	12:00P	9169998777	Host	114.00	5.70
4	05/24/19	12:02P	4155242290	Host	112.00	5.60
5	05/24/19	12:02P	6614773385	Host	112.00	5.60
6	05/24/19	12:02P	9258581340	Host	45.00	2.25
Subtotal			608.00			30.40

Cuyama GSA Conference ID: 4843290

#	Date	Time	Other	Location	Mins	Amt
1	05/24/19	02:00P	6613337091	Host	5.00	.25
Subtotal			5.00			.25

Cuyama GSA Conference ID: 4849558

#	Date	Time	Other	Location	Mins	Amt
1	05/31/19	11:56A	4157938420	Host	70.00	3.50
2	05/31/19	11:58A	6613951000	Host	68.00	3.40
3	05/31/19	11:58A	9256274112	Host	64.00	3.20
4	05/31/19	11:59A	4155242290	Host	67.00	3.35
5	05/31/19	12:00P	5304058800	Host	66.00	3.30
6	05/31/19	12:02P	6614773385	Host	64.00	3.20
Subtotal			399.00			19.95

A Cuyama Charges:		
	1-May	\$70.75
	6-May	\$0.10
	6-May	\$21.65
	9-May	\$6.25
	10-May	\$15.25
	13-May	\$58.60
	17-May	\$24.90
	17-May	\$4.85
	20-May	\$6.40
	24-May	\$30.40
	24-May	\$0.25
	30-May	\$33.90
	30-May	\$65.85
	31-May	<u>\$19.95</u>
B	Subtotal	\$359.10
C	Total Conf Line Charge	\$852.00
D	Cuyama % of Total Bill (B/C)	42%
E	Fees	\$160.18
F	Fee Incurred by Cuyama (D*E)	\$67.51
G	Total Cuyama Charge (B+F)	\$426.61

CUYAMA PRINTING COSTS

Board- 5/1/19

Document	B&W, or Color	Pages	Rate	Cost
Agenda (Board)	B&W	30	\$ 0.10	\$ 3.00
Agenda (Public)	B&W	40	\$ 0.10	\$ 4.00
Spanish Presentations	B&W	87	\$ 0.10	\$ 8.70
Sign-in Sheet	B&W	1	\$ 0.10	\$ 0.10
Board Packets	B&W	141	\$ 0.10	\$ 14.10
Total Cost				\$ 29.90

SAC- 5/30/19

Document	B&W, or Color	Pages	Rate	Cost
Agenda (Board)	B&W	30	\$ 0.10	\$ 3.00
Agenda (Public)	B&W	40	\$ 0.10	\$ 4.00
Spanish Presentations	B&W	141	\$ 0.10	\$ 14.10
Sign-in Sheet	B&W	1	\$ 0.10	\$ 0.10
SAC Packets	B&W	75	\$ 0.10	\$ 7.50
Total Cost				\$ 28.70

CUYAMA LANDOWNER PRINTING COSTS

May

Document	B&W, or Color	Pages	Rate	Cost
5/1 Board Packet	B&W	135	\$ 0.10	\$ 13.50
5/30 SAC Packet	B&W	75	\$ 0.10	\$ 7.50
Total Cost				\$ 21.00

Total Cost	\$ 79.60
------------	----------

**KLEIN, DENATALE, GOLDNER
COOPER, ROSENLIEB & KIMBALL, LLP**

133

4550 CALIFORNIA AVENUE
SECOND FLOOR
BAKERSFIELD, CA 93309

MAILING ADDRESS:
P.O. BOX 11172
BAKERSFIELD, CA 93389-1172
(661) 395-1000
FAX (661) 326-0418
E-MAIL accounting@kleinlaw.com

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY
C/O HALLMARK GROUP
*****EMAIL INVOICES*****

May 31, 2019
Bill No. 22930-001-145663
JDH

Statement for Period through May 20, 2019

Re: 22930 - CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY
001 GENERAL BUSINESS

Date		Services	Hours	Amount
04/19/19	DKK	RESEARCHED SIGMA NOTICE AND PUBLIC COMMENT DEADLINES.	0.40	76.00
04/19/19	JDH	WEEKLY PMT CALL.	1.10	297.00
04/19/19	JVK	REVISED ANALYSIS OF 10927 REQUIREMENT; E-MAILED J. HUGHES REGARDING SAME.	0.20	54.00
04/19/19	JVK	RECEIVED AND REVIEWED DRAFT PUBLIC ENGAGEMENT STRATEGY; REVIEWED REQUIREMENTS OF SECTION 10728.4.	0.50	135.00
04/21/19	JDH	REVIEWED AND REPLIED TO E-MAIL FROM T. BLAKSLIEE REGARDING PUBLIC COMMENT SLIDE.	0.30	81.00
04/22/19	JVK	E-MAILED M. CURRIE REGARDING WATER CODE SECTION 10927; RECEIVED AND REVIEWED E-MAIL FROM M. CURRIE REGARDING SAME.	0.50	135.00
04/25/19	JDH	ATTENDED SAC APRIL REGULAR MEETING TELEPHONICALLY.	2.00	540.00
04/25/19	JDH	TELEPHONE CONFERENCE WITH A. DOUD REGARDING DEVELOPMENT OF GSP.	0.30	81.00
04/26/19	JDH	WEEKLY PMT CONFERENCE CALL.	1.10	297.00
04/29/19	JDH	TELEPHONE CONFERENCE WITH A. DOUD REGARDING BOARD MEETING.	0.50	135.00
04/29/19	JVK	RESEARCHED GSP ADOPTION REQUIREMENTS TO ENSURE PLAN FOR ADOPTION COMPLIES WITH NOTICE PROVISIONS.	1.20	324.00
05/01/19	JDH	ATTENDED MAY REGULAR BOARD MEETING AND PORTION OF PUBLIC WORKSHOP.	6.00	1,620.00
05/01/19	JDH	TELEPHONE CONFERENCES WITH J. BECK AND T. BLAKSEE REGARDING BOARD MEETING; PREPARED FOR BOARD MEETING.	0.60	162.00
05/06/19	JDH	WEEKLY PMT CALL.	0.70	189.00

PAYMENT DUE UPON RECEIPT
PLEASE REFER TO BILL NUMBER LOCATED BENEATH STATEMENT DATE WHEN SUBMITTING PAYMENT
TO ENSURE PROPER CREDIT.
A FINANCE CHARGE OF 1 1/2% PER MONTH (18% ANNUALLY) WILL BE CHARGED ON ALL BALANCES OVER 30 DAYS.
FEDERAL I.D. NO. 95-2298220

**KLEIN, DENATALE, GOLDNER,
COOPER, ROSENLIEB & KIMBALL, LLP**

134

Bill No. 22930-001-145663

May 31, 2019

Page 2

Client Ref: 22930 - 001

Date	Services	Hours	Amount
05/10/19	JDH TELEPHONE CONFERENCE WITH T. BLAKSLEE.	0.30	81.00
05/17/19	JDH WEEKLY PMT CALL.	1.00	270.00
		Rate	Hours
JDH	HUGHES, JOSEPH	270.00	13.90
JVK	KOMAR, JOHN	270.00	2.40
DKK	KEY, DARIEN	190.00	0.40
Total Fees			\$4,477.00

Costs and Expenses

Date	Expenses	Amount
05/02/19	TRAVEL EXPENSES 5/1 ROUND TRIP TRAVEL TO NEW CUYAMA FOR MAY BOARD MEETING - JOSEPH D. HUGHES	75.40
Total Costs and Expenses		\$75.40

Current Charges	\$4,552.40
Prior Statement Balance	33,993.02
Payments/Adjustments Since Last Bill	-28,000.00
Pay This Amount	\$10,545.42

Any Payments Received After May 31, 2019 Will Appear on Your Next Statement

PAYMENT DUE UPON RECEIPT
PLEASE REFER TO BILL NUMBER LOCATED BENEATH STATEMENT DATE WHEN SUBMITTING PAYMENT
TO ENSURE PROPER CREDIT.
A FINANCE CHARGE OF 1 1/2% PER MONTH (18% ANNUALLY) WILL BE CHARGED ON ALL BALANCES OVER 30 DAYS.
FEDERAL I.D. NO. 95-2298220



COMMITMENT & INTEGRITY
DRIVE RESULTS

Remit to:
PO Box 55008
Boston, MA 02205-5008

T 800.426.4262
T 207.774.2112
F 207.774.6635

INVOICE

TD BANK
Electronic Transfer:
⑆211274450 ⑆2427662596⑆

Jim Beck
Executive Director
Cuyama Basin Groundwater Sustainability Agency
c/o Hallmark Group
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815

June 21, 2019
Project No: 0011078.01
Invoice No: 164204

Project 0011078.01 CUYAMA GSP

Professional Services for the period ending May 31, 2019

Phase 015 Project Management (Cat 1 – Task 4)

Professional Personnel

	Hours	Rate	Amount
National Practice Leader Melton, Lyndel	2.00	320.00	640.00
Project Manager 2 Van Lienden, Brian	7.00	266.00	1,862.00
Totals	9.00		2,502.00
Labor Total			2,502.00

Total this Phase \$2,502.00

Total this Invoice \$2,502.00

Outstanding Invoices

Number	Date	Balance
152397	7/19/2018	152,525.65
153619	8/23/2018	135,300.00
154409	9/19/2018	195,124.42
155666	10/23/2018	101,772.20
156545	11/14/2018	84,659.70
157849	12/19/2018	142,959.49
159014	1/24/2019	101,806.18
160067	2/22/2019	87,543.93
161007	3/20/2019	73,093.65
161834	4/16/2019	68,280.03
163339	5/28/2019	76,405.52
Total		1,219,470.77

Project Summary	Current Fee	Previous Fee	Total
	2,502.00	1,932,515.08	1,935,017.08

Approved by: 

Brian Van Lienden
Project Manager
Woodard & Curran

Please include our invoice number in your remittance. Thank you.



Progress Report

Cuyama Basin Groundwater Sustainability Plan Development

Subject: May 2019 Progress Report
 Jim Beck, Executive Director,
Prepared for: Cuyama Basin Groundwater Sustainability Agency (CBGSA)
Prepared by: Brian Van Lienden, Woodard & Curran
Reviewed by: Lyndel Melton, Woodard & Curran
Date: June 21, 2019
Project No.: 0011078.01

This progress report summarizes the work performed and project status for the period of April 27, 2019 through May 31, 2019 on the Cuyama Basin Groundwater Sustainability Plan Development project. The work associated with this invoice was performed in accordance with our Consulting Services Agreement dated December 6, 2017, and with Task Orders 4 and 5, issued by the CBGSA on June 6, 2018. Note that Task Order 1, 2 and 3 were already 100% spent as of the beginning of this reporting period.

As of the completion of this work period, Task Order 4 is now 100% spent. However, due to previous and ongoing out of scope work efforts, \$79,106.29 in additional unbilled work has been performed this month on the Category 2 Tasks authorized in Task Order 4, for a total of \$123,962.06 in unbilled work on these tasks. It is estimated that approximately \$56,000 in additional work will be required beyond the current budgets to complete the remaining scope of work associated with Task Orders 4 and 5.

The progress report contains the following sections:

1. Work Performed
2. Budget Status
3. Schedule Status
4. Outstanding Issues to be Coordinated

1 Work Performed

A summary of work performed on the project during the current reporting period is provided in Tables 1 and 2 below. Table 1 shows work performed under Task Orders 2 and 4, which include tasks identified in the forthcoming Category 2 grant from the California Department of Water Resources (DWR). Table 2 shows work performed under Task Orders 3 and 5, which includes tasks identified in the forthcoming Category 1 grant from DWR.

Table 1: Summary of Task/Deliverables Status for Category 2 Tasks (Task Orders 2 and 4)

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 1: Initiate Work Plan for GSP and Stakeholder Engagement Strategy Development	<ul style="list-style-type: none"> Task 1 is completed; no work was undertaken on this task during this reporting period 	100%	<ul style="list-style-type: none"> Task 1 is completed; no further work is anticipated
Task 2: Data Management System, Data Collection and Analysis, and Plan Review	<ul style="list-style-type: none"> Task 2 is completed; no work was undertaken on this task during this reporting period 	100%	<ul style="list-style-type: none"> Task 2 is completed; no further work is anticipated
Task 3: Description of the Plan Area, Hydrogeologic Conceptual Model, and Groundwater Conditions	<ul style="list-style-type: none"> Task 3 is completed; no work was undertaken on this task during this reporting period 	100%	<ul style="list-style-type: none"> Task 3 is completed; no further work is anticipated
Task 4: Basin Model and Water Budget	<ul style="list-style-type: none"> Task 4 is completed; no work was undertaken on this task during this reporting period 	100%	<ul style="list-style-type: none"> Task 4 is completed; no further work is anticipated
Task 5: Establish Basin Sustainability Criteria	<ul style="list-style-type: none"> Task 5 is completed; no work was undertaken on this task during this reporting period 	100%	<ul style="list-style-type: none"> Task 5 is completed; no further work is anticipated
Task 6. Monitoring Networks	<ul style="list-style-type: none"> Task 6 is completed; no work was undertaken on this task during this reporting period 	100%	<ul style="list-style-type: none"> Task 6 is completed; no further work is anticipated
Task 7: Projects and Actions for Sustainability Goals	<ul style="list-style-type: none"> Task 7 is completed; no work was undertaken on this task during this reporting period 	100%	<ul style="list-style-type: none"> Task 7 is completed; no further work is anticipated

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 8. GSP Implementation	<ul style="list-style-type: none"> Task 8 is completed; no work was undertaken on this task during this reporting period 	100%	<ul style="list-style-type: none"> Task 8 is completed; no further work is anticipated
Task 9. GSP Development	<ul style="list-style-type: none"> Updated GSP Public Draft, chapters and appendices in response to comments and Board direction 	86%	<ul style="list-style-type: none"> The GSP Public Draft will be updated in response to comments and Board direction
Task 10: Education, Outreach and Communication	<ul style="list-style-type: none"> Participated in meetings with CBGSA Board and SAC 	79%	<ul style="list-style-type: none"> Continued participation in meetings with CBGSA Board, SAC and local stakeholders
Task 11: Project Management	<ul style="list-style-type: none"> Task 8 is completed; no work was undertaken on this task during this reporting period 	100%	<ul style="list-style-type: none"> Task 11 is completed; no further work is anticipated. Further project management activities will be covered in Task 15.

Table 2: Summary of Task/Deliverables Status for Category 1 Tasks (Task Orders 3 and 5)

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 12: Groundwater Monitoring Well Network Expansion	<ul style="list-style-type: none"> No work was performed on Task 12 during this period. 	62%	<ul style="list-style-type: none"> Work will commence to perform the field work required to install the data sensors
Task 13: Evapotranspiration Evaluation for Cuyama Basin Region	<ul style="list-style-type: none"> Implementation of land use and METRIC ET estimates in Cuyama Basin model was finalized A documentation tech memo was developed that will be included in the GSP Public Draft 	100%	<ul style="list-style-type: none"> Task 13 is completed; no further work is anticipated
Task 14: Surface Water Monitoring Program	<ul style="list-style-type: none"> No work was performed on Task 14 during this period. 	41%	<ul style="list-style-type: none"> Work will continue to install the surface flow gages
Task 15: Category 1 Project Management	<ul style="list-style-type: none"> Ongoing project management and grant administration activities 	91%	<ul style="list-style-type: none"> Ongoing project management and grant administration activities

2 Budget Status

Table 3 shows the percent spent for each task under Task Order 1. 100% of the available Task Order 1 budget has been expended (\$321,135.00 out of \$321,135).

Table 3: Budget Status for Task Order 1

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
1	\$ 35,768.00	\$ 35,755.53	\$ -	\$ 35,755.53	\$ 12.47	100%
2	\$ 61,413.00	\$ 61,413.00	\$ -	\$ 61,413.00	\$ -	100%
3	\$ 45,766.00	\$ 45,766.00	\$ -	\$ 45,766.00	\$ -	100%
4	\$ 110,724.00	\$ 110,724.00	\$ -	\$ 110,724.00	\$ -	100%
5	\$ -	\$ -	\$ -	\$ -	\$ -	n/a
6	\$ -	\$ -	\$ -	\$ -	\$ -	n/a
7	\$ 12,120.00	\$ 12,120.00	\$ -	\$ 12,120.00	\$ -	100%
8	\$ -	\$ -	\$ -	\$ -	\$ -	n/a
9	\$ -	\$ -	\$ -	\$ -	\$ -	n/a
10	\$ 45,420.00	\$ 45,432.47	\$ -	\$ 45,432.47	\$ (12.47)	100%
11	\$ 9,924.00	\$ 9,924.00	\$ -	\$ 9,924.00	\$ -	100%
Total	\$ 321,135.00	\$ 321,135.00	\$ -	\$ 321,135.00	\$ -	100%

Table 4 shows the percent spent for each task under Task Order 2. 100% of the available Task Order 2 budget has been expended (\$399,469.00 out of \$399,469).

Table 4: Budget Status for Task Order 2

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
1	\$ -	\$ -	\$ -	\$ -	\$ -	n/a
2	\$ 48,457.00	\$ 48,458.00	\$ -	\$ 48,458.00	\$ (1.00)	100%
3	\$ 24,182.00	\$ 24,182.00	\$ -	\$ 24,182.00	\$ -	100%
4	\$ 103,880.00	\$ 103,880.00	\$ -	\$ 103,880.00	\$ -	100%
5	\$ 60,676.00	\$ 60,676.00	\$ -	\$ 60,676.00	\$ -	100%
6	\$ 65,256.00	\$ 65,255.00	\$ -	\$ 65,255.00	\$ 1.00	100%
7	\$ 36,402.00	\$ 36,402.00	\$ -	\$ 36,402.00	\$ -	100%
8	\$ -	\$ -	\$ -	\$ -	\$ -	n/a
9	\$ -	\$ -	\$ -	\$ -	\$ -	n/a
10	\$ 45,420.00	\$ 45,420.00	\$ -	\$ 45,420.00	\$ -	100%
11	\$ 15,196.00	\$ 15,196.00	\$ -	\$ 15,196.00	\$ -	100%
Total	\$ 399,469.00	\$ 399,469.00	\$ -	\$ 399,469.00	\$ -	100%

Table 5 shows the percent spent for each task under Task Order 3. 100% of the available Task Order 3 budget has been expended (\$188,238.00 out of \$188,238).

Table 5: Budget Status for Task Order 3

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
12	\$ 53,244.00	\$ 53,244.00	\$ -	\$ 53,244.00	\$ -	100%
13	\$ 69,706.00	\$ 69,706.00	\$ -	\$ 69,706.00	\$ -	100%
14	\$ 53,342.00	\$ 53,342.00	\$ -	\$ 53,342.00	\$ -	100%
15	\$ 11,946.00	\$ 11,946.00	\$ -	\$ 11,946.00	\$ -	100%
Total	\$ 188,238.00	\$ 188,238.00	\$ -	\$ 188,238.00	\$ -	100%

Table 6 shows the percent spent for each task under Task Order 4 as of May 31, 2019. 100% of the available Task Order 4 budget has been expended (\$764,394.14 out of \$764,396). As shown in the Table, a total of \$79,106.29 was spent this month on project tasks. None of this amount has been billed on the invoice. Adding this amount to unbilled work in previous months, a total of \$123,962.06 in project work on these tasks has not yet been billed.

Table 6: Budget Status for Task Order 4

Task	Total Budget	Spent Previously	Spent this Period (Total of Invoiced and Withheld)	Amount Invoiced This Month	Total Spent to Date	Budget Remaining	% Spent to Date
1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	n/a
2	\$ 24,780.00	\$ 24,793.50	\$ -	\$ -	\$ 24,793.50	\$ (13.50)	100%
3	\$ 26,912.00	\$ 26,894.00	\$ -	\$ -	\$ 26,894.00	\$ 18.00	100%
4	\$ 280,196.00	\$ 280,190.26	\$ -	\$ -	\$ 280,190.26	\$ 5.74	100%
5	\$ 47,698.00	\$ 47,641.88	\$ -	\$ -	\$ 47,641.88	\$ 56.12	100%
6	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	n/a
7	\$ 117,010.00	\$ 117,009.20	\$ -	\$ -	\$ 117,009.20	\$ 0.80	100%
8	\$ 69,780.00	\$ 69,831.25	\$ -	\$ -	\$ 69,831.25	\$ (51.25)	100%
9	\$ 91,132.00	\$ 91,567.49	\$ 58,276.12	\$ -	\$ 91,567.49	\$ (435.49)	100%
10	\$ 70,236.00	\$ 69,766.10	\$ 20,830.17	\$ -	\$ 69,766.10	\$ 469.90	100%
11	\$ 36,652.00	\$ 36,700.46		\$ -	\$ 36,700.46	\$ (48.46)	100%
Total	\$ 764,396.00	\$ 764,394.14	\$ 79,106.29	\$ -	\$ 764,394.14	\$ 1.86	100%

Table 7 shows the percent spent for each task under Task Order 5 as of May 31, 2019. 57% of the available Task Order 5 budget has been expended (\$259,278.95 out of \$459,886).

Table 7: Budget Status for Task Order 5

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
12	\$ 196,208.00	\$ 126,731.51	\$ -	\$ 126,731.51	\$ 69,476.49	65%
13	\$ 24,950.00	\$ 24,933.01	\$ -	\$ 24,933.01	\$ 16.99	100%
14	\$ 204,906.00	\$ 80,315.88	\$ -	\$ 80,315.88	\$ 124,590.12	39%
15	\$ 33,822.00	\$ 27,298.55	\$ 2,502.00	\$ 29,800.55	\$ 4,021.45	88%
Total	\$ 459,886.00	\$ 259,278.95	\$ 2,502.00	\$ 261,780.95	\$ 198,105.05	57%

3 Schedule Status

The project is on schedule. Work authorized under Task Orders 1, 2 and 3 are complete.

4 Outstanding Issues to be Coordinated

As noted above, as of the completion of this work period, Task Order 4 is now 100% spent. However, due to previous and ongoing out of scope work efforts, \$123,962.06 in additional unbilled work has been performed on the Category 2 Tasks authorized in Task Order 4. It is estimated that approximately \$56,000 in additional work will be required to complete the remaining scope of work associated with Task Orders 4 and 5.

Agenda Item No. 12 - Correspondence

Walking U Ranch, LLC, a California Limited Liability Company
Kathleen P. March, Managing Member
10524 W. Pico Blvd, Suite 212, LA, CA 90064
Phone: 310-559-9224 Fax: 310-559-9133
Email: kmarch@BKYLAWFIRM.com

June 9, 2019

Cuyama Basin Groundwater Sustainability Agency (“GSA”)
4900 California Avenue, Tower B, 2nd Floor,
Bakersfield, CA 93309
Attention Taylor Blakslee, Project Manager

By mail, and by email to TBlakslee@hgcpm.com

To Directors of the Cuyama Basin GSA:

I write to the Cuyama Basin Groundwater Sustainability Agency (“GSA”), as the managing member of Walking U Ranch, LLC (“Ranch”), which owns and runs a 989 acre cattle ranch located at 1850 Miranda Canyon, New Cuyama, CA 93254, in the western part of the Cuyama Valley.

Ranch has 28 cows, 2 bulls, and until they are sold later this month, has 13 calves, grazing over its 989 acres. Ranch uses very little water, because it is cattle grazing only, with no crops of any kind. Ranch’s water use is only to water cattle, and to water Ranch’s horses used to work cattle, and for house use of the resident Ranch manger and his family, and of additional persons visiting and working for Ranch. The cattle, horses, and people, drink water that Ranch pumps from a well located on Ranch, using a solar pump, plus from springs Ranch licenses from the US Forest Service.

Ranch, and the other cattle Ranches in the Cuyama Valley, have not, and are not, using more water than is sustainable. Ranching is NOT depleting the water table. It is farming that is depleting the water table in the Cuyama Valley, particularly in the Central Basin portion of the Cuyama Valley, where growing carrots, alfalfa, and other crops uses more water than the water table can supply on a sustainable basis.

In addition, the 500,000 grape vines that North Fork (aka Harvard University) has planted in the last couple of years, only a couple of miles east of Ranch, are NEW water usage. Because, before Harvard University planted its 500,000 grape vines, that land was cattle grazing land.

The western portion of the Cuyama Valley, where Ranch is located, does not have an over-drafting, falling water table, problem, because the majority of the western portion of the Valley is cattle ranching, NOT farming, and the cattle ranchers do NOT use more water than the water table in the western portion of the Valley can sustain.

Ranch understands some of the big farming operations, in the Central Basin part of the Cuyama Valley, are proposing that any tax, levy, or assessment to pay for developing, implementing, and

enforcing a groundwater sustainability program in the Cuyama Valley, or to charge for water itself, should be assessed on the basis of acres owned by each landowner in the Cuyama Valley, instead of being assessed based on the amount of water used by each landowner in the Cuyama Valley.

If the Cuyama Basin GSA were to charge a tax, levy or assessment, to fund a groundwater sustainability program, or for water use, on the basis of number of acres owned, instead of charging on the basis of amount of water used by each landowner, such a tax, levy or assessment would be so irrational and unfair as to be wholly illegal, including illegal as a violation of due process, and illegal as taking by a government agency, without right, and without compensation. This is because there is no correlation between acres owned, and water consumption. Example: the 793 acre property immediately east of Ranch has no water at all, and so uses no water at all. Should that 793 acres, that uses zero water--because it has zero water--be assessed/levied/taxed, for the costs of the groundwater sustainability program, the same as a 793 acre carrot field, or alfalfa field, or vineyard, that consume HUGE amounts of water to grow those crops. Of course not, because that would be irrational, and so would be an illegal taking. The undersigned and husband own an alfalfa farm in Creston, CA, and we pump 335 gallons of water a minute, 14 hours a day, 7 days a week, for the 6 months alfalfa growing period, to grow 25 acres of alfalfa per year, 5 or 6 cuttings. So I know the HUGE amount of water that such crops require, first hand.

Anyone who checks the electric bills of the large farms can determine how much water they are pumping, from those farms' electric bills. I can tell GSA how to do that, if you don't know how, because I check the electric bills on our Creston alfalfa farm, to see how much water is being pumped, to irrigate the alfalfa. Ranch suggests the GSA should demand to see the electric bills of those large farms. As a governmental agency, GSA has the ability to demand production of those electric bills. Electric utilities keep those bills for several years back. Checking the electric bills will show exactly which farming operations are pumping more water than is sustainable.

In addition to being illegal, if an assessment/tax/levy to pay the costs of the groundwater sustainability program were assessed based on acreage owned--instead of assessed based on water consumed—doing so would not make economic sense. A per acre assessment/tax/levy would have the effect of forcing ranchers (who use little water) to subsidize farmers, who use excessive amounts of water, for the cost of the groundwater sustainability program. There is no legal or equitable basis for imposing farming costs on ranch properties. Ranchers aren't asking farmers to subsidize ranchers' costs, and shouldn't have to pay assessments that farmers should be paying, based on farmers' high (unsustainably high) water use. Moreover, farmers can add the cost of the groundwater sustainability program assessments to what farmers charge for their crops, when they sell their crops. In contrast, if ranchers were forced to pay an assessment that was, irrationally, assessed on acreage owned--to try to fix a problem that farmers created—the ranchers cannot pass on that assessment cost, by adding it to the price of crops sold. Requiring everyone to pay according to water usage will put the majority of the cost of the groundwater sustainability program where it belongs, which is on the large farms which use huge amounts of water, more than is sustainable, who are the ones who have caused the water overuse problem. In addition, assessment based on water usage will encourage water conservation.

It is Ranch's understanding that North Fork (aka Harvard University) supports any assessment/tax/levy to pay for the costs of the groundwater sustainability program, being assessed on the basis of water usage, not on the basis of acres owned.

The big farmers in the Central Basin are the ones who caused the depletion of the water table in the Central Basin, and they are the ones who should pay for their over-use of water, including paying for developing, implementing, and enforcing a groundwater sustainability program, in the Cuyama Valley. The way to charge the people that have overused water, for causing the need for a water sustainability program, is to charge any levy, assessment or tax for developing, implementing, and enforcing a water sustainability program, in the Cuyama Valley, based on amount of water each landowner uses--NOT based on acreage each landowner owns--and to charge an additional levy, on the farms which have depleted the Central Basin water table (by taking out more water, than the water table can sustain), for the cost of developing and running a groundwater sustainability program, to try to fix the groundwater depletion problem these large farming operations have caused.

Ranch, and every other property owner which does NOT over-consume water, should demand, that any levy, assessment or tax, relating to developing, implementing, and enforcing a groundwater sustainability program, in the Cuyama Valley, or relating to water use itself, must be calculated based on amount of water each landowner uses, NOT based on acreage each landowner owns. Walking U Ranch, LLC demands this. In every city and town in the US, there are water meters charging houses and businesses for gallons of water used, NOT for the number of square feet owned by each house or business.

If there must be a levy, assessment or tax to develop, implement and enforce a groundwater sustainability program in the Cuyama Valley, that assessment must be based on amount of water each landowner uses, NOT based on acreage each landowner owns. If based on acreage, instead of water usage, it will be illegal, and any Agency, which tries to implement such an illegal assessment, will get sued. My husband and I are both lawyers, so we know a few things about suing, if necessary.

Moreover, the farms in the Central Basin portion of the Cuyama Valley, which have for DECADES used more water than is sustainable, to irrigate their carrots, alfalfa, and other crops—NOT caring how much they depleted the water table--should be charged an additional amount, for having created the water depletion that now requires having a water sustainability program. It is the greedy, irresponsible, excessive, water use of those big farms, that is causing this water depletion crisis for the whole Cuyama Valley.

The excessive water use of those big farms is NOT being responsible businesses, or good neighbors. That conduct is selfish, greedy behavior, damaging all the rest of the landowners in the Cuyama Valley, and damaging to the environment. Those of us, like Ranch, which do not, and never have, used more water than is sustainable, should NOT pretend these big farms have acted properly, because they have NOT acted properly. The farms guilty of excessive water use,

which has been depleting, and continues to deplete, the water table in the Central Basin, should pay **MORE OF THE COSTS** of creating, implementing and enforcing a water sustainability program, **because it is fair and proper to charge these large irresponsible farms for fixing the water depletion problem THAT THEY HAVE CAUSED.**

Therefore, Ranch proposes that:

- (1) any levy, assessment or tax, to develop, implement and enforce a groundwater sustainability program in the Cuyama Valley, or for water use itself, should be assessed based on **amount of water each landowner uses, NOT based on acreage each landowner owns;** and
- (2) that landowners who can be demonstrated to have used more water than is sustainable **should be charged an extra assessment,** to pay for trying to undo the damage they have caused--and continue to cause--to the water table in the Cuyama Valley, particularly the Central Basin portion of the Cuyama Valley.

Cattle ranchers, and other responsible water users, stop acting like sheep. Don't let these big farmers force you to pay **per acre owned.** Join Ranch in demanding (1) and (2).

Walking U Ranch, LLC



By Kathleen P. March, Esq.,
sole managing member of LLC

WALKING U RANCH, LLC, a California LLC
 C/O Kathleen P. March, Esq., managing member
 10524 W. Pico Boulevard, Suite 212, Los Angeles, CA 90064
 Phones: office 310-559-9224 and cell 213-700-6638 and Fax: 310-559-9133
 E-mail: kmarch@bkylawfirm.com Website: www.bkylawfirm.com

June 12, 2019

To:

Cuyama Basin Groundwater Sustainability Agency ("GSA")
 4900 California Avenue, Tower B, 2nd Floor,
 Bakersfield, CA 93309

and To:

GSA Project Manager (Executive Director), Jim Beck, attn. to Taylor Blakslee, assistant to Mr. Beck, by email to TBlakslee@hgcpm.com

To Directors of the Cuyama Basin GSA and to Jim Beck, as Project Manager (Executive Director) of GSA:

This is my second letter to the Cuyama Basin Groundwater Sustainability Agency ("GSA"). As I did in my 6/9/19 letter, I write again, as the managing member of Walking U Ranch, LLC ("Ranch"), which owns and runs a 989 acre cattle ranch located at 1850 Miranda Canyon, New Cuyama, CA 93254, in the western part of the Cuyama Valley.

I ask that you, Mr. Beck/Mr. Blakslee, give this letter to the members /directors of the Cuyama Basin Groundwater Sustainability Agency ("GSA"). As you declined, yesterday, to give me Mr. Beck's email, I cannot email directly to Mr. Beck. **Please REPLY to me, Mr. Blakslee, to kmarch@bkylawfirm.com to confirm you will do so. Thank you.**

Please include a copy of this letter (and my 6/9/19 letter and email) in the packet of materials that you Mr. Beck/Mr. Blakslee will provide to Water Board members for the upcoming July 10, 2019 a 4pm Water Board meeting in New Cuyama, CA. **Please REPLY to me, to kmarch@bkylawfirm.com to confirm you will do so.**

You confirmed to me, Mr. Beck, when we spoke by phone today, that at the July 10, 2019 meeting, the Water Board will be considering the question of whether assessments/ levies/ taxes that GSA charges landowners, to fund the Cuyama Basin Groundwater Sustainability Plan ("GSP") should be charged on a **water used** basis, or should be charged on an **acres owned** basis.

You, Mr. Beck, confirmed to me, on the phone, that you, Mr. Beck, as Project Manager for GSA, are "**neutral**" on the question of whether GSA should charge landowners such assessments/levies/taxes for GSP on a **water used** basis, or on an **acres owned** basis. Neither you, Mr. Beck, nor GSA's water use attorney (you told me GSA has a water use attorney), should be "neutral" on this question. Both you, Mr. Beck, as Project Manager for GSA, and GSA's water use attorney, should tell GSA, and the Water Board, that GSA cannot assess

property owners for costs of creating or running a GSP, based on an **acres owned** basis, instead of assessing property owners on a **water used** basis, because charging property owners on an **acres owned** basis, for the costs of creating or running GSP, would be **illegal**.

As I said in my 6/9/19 letter, and as I told you, Mr. Beck, on the phone today, it would be **illegal**, if GSA were to assess landowners for costs of GSP, based on **acres owned** by each landowner, instead of assessing based on **water used** by each landowner.

“Acres owned” assessment would violate California Water Code §10730.2; plus would violate California Constitution Articles XIII C and D (particularly Proposition 218, which was passed to prevent government agencies from assessing landowners’ property based fees, which are actually property taxes, without following the constitutionally required procedure for passing a new property tax by a 2/3rds vote of voters), and Proposition 26 (defines what is a tax); plus would violate due process rights guaranteed to landowners by both the California and United States Constitutions.

Each of those laws make it **illegal**, to assess landowners for costs of developing/ implementing/ performing monitoring of water use, pursuant any Cuyama Basin Groundwater Sustainability Plan (“GSP”), on a **per acre** basis, as opposed to assessing on a **water used** basis.

Here’s a little detail on the controlling law:

1. **California Water Code §10730.2(a)** states:

“(a) A groundwater sustainability agency that adopts a groundwater sustainability plan pursuant to this part **may impose fees on the extraction of groundwater** from the basin **to fund costs** of groundwater management...”

The words “fees on the extraction of groundwater”, means fees assessed based on **water usage**.

In addition, California Water Code §10730.2(d) says that fees imposed may include:

“fees charged on a volumetric basis, including, but not limited to, fees that increase based on the quantity of groundwater produced annually...”

NOTHING in California Water Code §10730.2(a) allows assessing landowners for a GSP based on **acreage owned by each landowner**.

2. **Articles XIII C and XIII D of the California Constitution, and Proposition 218**, have been held, by the CA Supreme Court, in *Silicon Valley Taxpayers Assoc v. Santa Clara County Open Space Authority*, 44 Cal.4th 431 (2008) to prohibit local government (this includes GSAs) from subjecting taxpayers to assessments, fees, or charges on property that are in fact taxes, but such taxes have not been approved by the required 2/3^{rds} vote of taxpayers. Proposition 26 defines what is a tax, and therefore cannot be charged without the required 2/3rds vote of taxpayers, after proper notice. There has not been proper notice, nor has there been a 2/3rds vote of taxpayers approving assessing landowners on a

per acre basis, for GSP costs. There are not enough big farming operations in the Cuyama Valley to give GSA the 2/3rds “we approve new tax” vote of landowners that would be required, to keep a “acres owned” assessment from violating these provisions of the California Constitution. Mr. Beck told me today that GSA’s land use attorney agrees that an acres owned assessment to pay for GSA costs would have to be approved, by a vote of 2/3rds of the landowners in the Cuyama Basin. GSA trying to get such a vote would cost a lot of money to properly notice and hold the required election, and would not get a 2/3rds vote, and so would fail.

But complying with Proposition 218 would not change the fact that an acres owned based assessment would violate California Water Code §10730.2, quoted at 1. Supra; would still violate due process (discussed at 3 immediately infra); and would be contrary to achieving the stated statutory purpose of GSPs, which is to achieve sustainable water use.

Achieving Statutory Purpose of GSAs/GSPs: Assessing landowners, based on water usage, for the costs of developing/running a GSP, further the statutory goal of GSPs, which is to encourage/achieve sustainable water use. Assessing GSP costs, based on water usage, will encourage landowners to conserve water, in order to reduce their water usage assessments. Conservation of water is essential to reaching the statutory goal of GSAs, of achieving sustainable water use. In contrast, assessing costs of developing and running GSAs, on an acres owned basis, has no relationship to the stated statutory purpose of GSAs of achieving sustainable water use, because acreage owned has nothing to do with water used. Faced with the alternatives of adopting a water usage based assessment, or an acreage based assessment, the only choice that furthers the statutory purpose of GSAs is a water usage based assessment, because only that choice will encourage water conservation, which is essential to reach the goal of achieving sustainable water use.

3. Due Process Rights that landowners have, pursuant to the California Constitution, and US Constitution, would additionally be violated by GSA assessing landowners for costs of GSP, based on an acres owned basis, instead of assessing costs of GSP, based on a water used basis. Assessing GSP costs based on acres owned is a violation of due process because, *inter alia*, acres owned has NO relationship to water used, and GSP’s statutory purpose is to achieve sustainable water use. Briefing the law on federal and state due process would take too long to put in this letter. But GSA’s water use attorney knows this law, and should confirm the above law (1, 2, 3), and should tell GSA that that acres owned assessment would violate landowners state and federal due process rights, would violate the California Water Code 10730.2, and would violate Articles XIII C and XIII D of the California Constitution, particularly violating Proposition 218.
4. Many of the properties in the Cuyama Valley are in the California Williamson Act, which provides that no property tax shall be levied on acres owned, that property taxes shall only be charged on structures on Williamson Act land. Assessing GSP costs on an “acres owned” basis would be contrary to the Williamson Act. The statutory purpose of the Williamson Act is to foster ranching and farming, as being activities beneficial to society as a whole.

Mr. Beck, you committed to me on the phone today that you would forward this letter, briefing applicable law, to GSA's water use attorney. Please do so promptly, and please ask that water use attorney to respond to my law firm, regarding the law briefed herein, to kmarch@bkylawfirm.com. If he responds promptly, maybe he and I will agree on controlling law, before the July 10, 2019 meeting.

GSA's water use attorney should be advising GSA that assessing GSP costs to landowners, based on acres owned, instead of assessing based on water used, would be **illegal**. GSA's water use attorney is undoubtedly aware that the statutory purpose of GSAs, the California Water Code, the California Constitution, and due process rights of landowners pursuant to the California and US Constitutions, **all prohibit** a GSA/GSP from assessing costs of developing/implementing/doing monitoring, on a **per acre** basis, as opposed to assessing on a **water used** basis. It took me exactly 15 minutes, on the phone with a water law attorney, to get the above law from him, which he told me is **basic GSA water law**.

In light of this controlling law, for you, Mr. Beck, as project manager (executive director) of GSA, to say you are "neutral" on whether GSP should assess based on acres owned, or based on water used, is violating your project manager's duty to advise GSA (and Water Board). Due to the fact that it would be **illegal** to assess based on a **per acre owned basis**, instead of assessing on a **water usage** by landowner basis, you, **Mr. Beck, and GSA's water use attorney**, should **not** be "neutral" as to whether GSA should vote to assess based on a **per acre owned basis**, as opposed to assessing on a **water usage by landowner basis**. Rather, you, Mr. Beck, as GSA's project manager, and GSA's water use attorney, should both advise GSA, and the Water Board, that GSP costs **cannot** be charged to landowners, on an acres owned basis, and can only be assessed, on a water used basis.

Walking U Ranch, LLC, by me as its managing member, requests that you, Mr. Beck, and GSA's land use attorney, both tell GSA, and the Water Board, at the July 10, 2019 meeting, that any assessments for GSP must be on the basis of water usage, and that GSA/GSP would be **acting illegally**, if GSA/Water Board were to assess landowners for costs of developing/implementing/ running the Cuyama Basin GSP on an **acres owned** basis.

In addition, you Mr. Beck, and GSA's land use attorney, have a duty to tell GSA that GSA will be subject to being sued, for **acting illegally**, if GSA were to assess GSP costs based on acres owned, instead of based on water used.

The law is so clear that it would be illegal—and contrary to statutory purpose of GSAs-- to assess landowners for GSP costs, on an **acreage owned basis**, that I cannot think of any legitimate reasons why you, Mr. Beck, as GSA's project manager would be saying you are **"neutral"** on whether the GSP assessment should be on an acres owned, or on a water used basis. As GSA's project manager, you Mr. Beck, should be urging GSA to assess landowners for the costs of developing and implementing a GSP, on a **water used basis**, so that the assessment will further the statutory purpose of GSAs/GSPs, which is to encourage sustainable water use, and so that it will not violate the controlling laws, briefed supra this letter. I urge you to do so at the 7/10/19 meeting.

In my 40 plus years of being an attorney, the most common reason I have seen, for someone to stay “neutral”, as between a legal option, and an illegal option, when their duty requires that the person NOT be neutral, is that someone is paying the person money, or other consideration, to be “neutral”, unbeknownst to the client (here GSA), which is relying on its project manager to give GSA unbiased advice. I suggest that GSA should require you, Mr. Beck, to give an explanation to GSA as to why you, Mr. Beck-- GSA’s project manager--should claim to be “neutral” as regards to whether GSA should adopt a **legal** means of assessment (**water used**), that will help achieve water sustainability (the statutory purpose of GSAs/GSPs, **versus** adopting an **illegal** means of assessment (**acres owned**), that is completely unrelated to achieving water sustainability. “Neutrality” is a dereliction of duty in this situation.

I plan to attend the 7/10/19 Water Board meeting, and I request to be allowed to address the Board, regarding the issue of whether GSP should assess property owners for GSP costs on an **acres owned basis**, or on a **water used basis**. Please Mr. Beck, or Mr. Blakslee, reply to kmarch@bkylawfirm.com, to confirm that I will be allowed to do so. I will be bringing a second attorney with me, who may also wish to address the Water Board.

Sincerely,

Walking U Ranch, LLC

By Kathleen P. March, Esq.

Sole Managing Member of LLC

WALKING U RANCH, LLC, a California LLC
 C/O Kathleen P. March, Esq., managing member
 10524 W. Pico Boulevard, Suite 212, Los Angeles, CA 90064
 Phones: office 310-559-9224 and cell 213-700-6638 and Fax: 310-559-9133
 E-mail: kmarch@bkylawfirm.com Website: www.bkylawfirm.com

June 13, 2019

To:

Cuyama Basin Groundwater Sustainability Agency (“GSA”)
 4900 California Avenue, Tower B, 2nd Floor,
 Bakersfield, CA 93309

and To:

GSA Project Manager (Executive Director), Jim Beck, attn. to Taylor Blakslee, assistant to Mr. Beck, by email to TBlakslee@hgcpm.com

To Directors of the Cuyama Basin GSA and to Jim Beck, as Project Manager (Executive Director) of GSA:

The very experienced water use lawyer, who has been assisting me with briefing controlling law, sent me the attached article, which says the Santa Rosa GSP’s proposal, being voted on today by the Santa Rosa GSA, is to assess landowners for GSP costs on a **water used** basis, and will only assess **large** water users for GSP costs. That article reports what I have already briefed for you, in my 6/12/19 letter to you, which is:

“Strict constitutional requirements on fees and taxes narrowed the funding options [for funding GSP] **to a fee based on actual or estimated groundwater use.”**

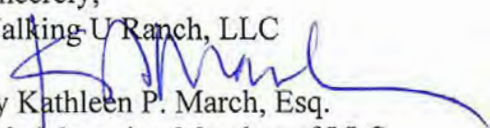
Looking at GSAs/GSPs throughout California, on the internet, **no** GSA in California has adopted a GSP that assesses landowners for GSP costs, on a **per acre owned** basis, so far as I have seen. This situation is no coincidence. This is because assessing landowners on a **water used** basis **furtheres the statutory purpose** of GSAs/GSPs, which is to achieve sustainable water use. Assessing landowners based on a landowner’s water use encourages each water user to conserve water (because the less water used, the lower the assessment will be), and conserving water is essential to reach GSA/GSP’s goal of sustainable water use. Second, as I have briefed for you, controlling law **does not allow** assessing landowners for GSP costs on an **acres owned** basis. That controlling law is briefed in my letter to you dated 6/12/19, and was mentioned in my letter to you of 6/9/19.

Why is the Cuyama Basin GSA the only GSA in California that is considering assessing GSP costs on an **acres owned** basis, instead of assessing GSP costs on a **water used** basis. Why does your Project Manager, Jim Beck, say he is **“neutral”** on whether Cuyama Basin GSA should adopt a **legal (water used)** assessment, that furthers the statutory purpose of GSAs/GSPs, versus adopting an **illegal (acres owned)** assessment, that does not further the statutory purpose?

Cuyama Basin GSA, and the Water Board, should require Mr. Beck to explain his “neutrality”, including asking Mr. Beck if he has been offered, or paid, consideration, to procure his

“neutrality”. You need to find out.

Sincerely,
Walking U Ranch, LLC

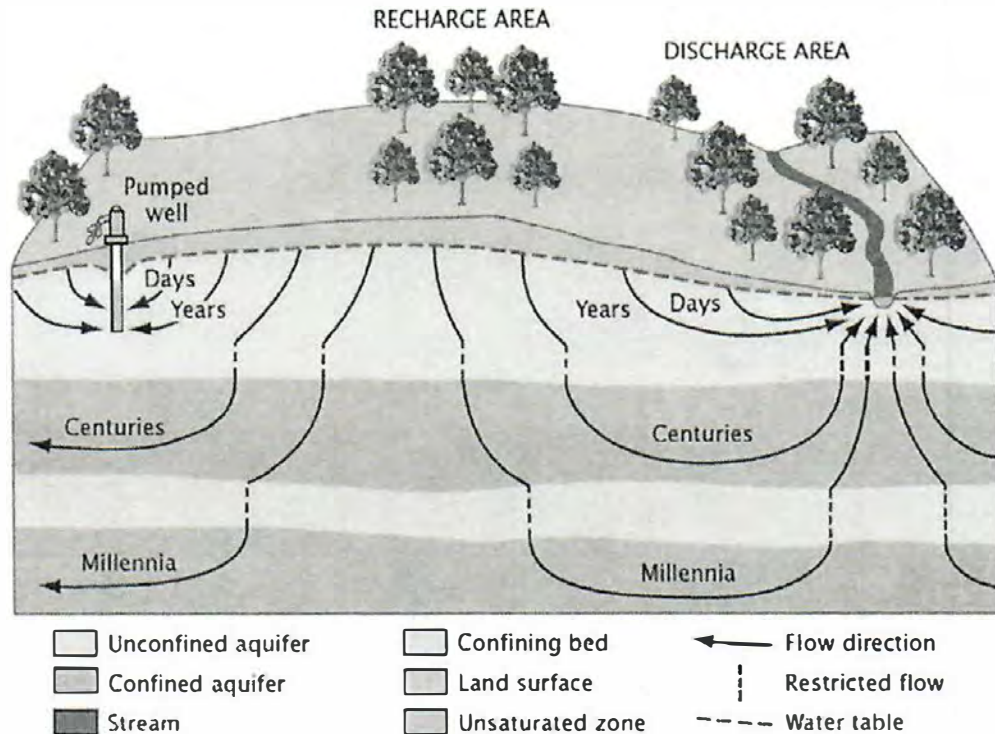

By Kathleen P. March, Esq.
Sole Managing Member of LLC

Attachment: Article regarding Santa Rosa Plain Groundwater Sustainability Agency GSP
funding from 6/11/19 Sonoma County Gazette

SONOMA COUNTY GAZETTE

Q SEARCH (/SEARCH-RESULTS.HTML) LOG IN (HTTPS://WWW.SONOMACOUNTYGAZETTE.COM/LOGIN/INDEX.HTML?RTN=HTTP://WWW.SONOM/

GROUNDWATER



LOW PATHS FROM RECHARGE TO DISCHARGE AREAS

Idealised cross section showing groundwater flow paths from recharge to discharge areas. An unconfined aquifer below the water table flows into a stream. Below that, two confined aquifers are renewed over much longer time scales (Source: CSIRO, 2011).

Groundwater Agency Schedules Public Meeting June 13 on Proposed Fee

Jun 11, 2019

Share:

The Board of Directors of the Santa Rosa Plain Groundwater Sustainability Agency is holding a public meeting on Thursday, June 13, 1 p.m. at 35 Stony Point Road to consider adoption of a groundwater sustainability fee and a groundwater user registration ordinance.

If approved by the Board, a groundwater sustainability fee would be assessed on groundwater users in the Santa Rosa Plain subbasin (an area extending from Santa Rosa west to Sebastopol and from Windsor south to Cotati). The fee would be based on actual or estimated groundwater pumped annually, and would be levied based on either pumping records or published studies of average groundwater use for irrigated crops and rural residents.

P.3 n.5

If approved, the fee amount would be \$19.90 per acre-foot of groundwater pumped annually. For rural landowners who use water for household and landscaping irrigation, the amount of water used annually is estimated to average 0.5 acre-feet annually (approximately 446 gallons per day), resulting in a fee of \$9.95 per year. The fee would take effect on July 1, 2019 and be fixed for three years.

While the proposed fee is calculated based on use by all groundwater users in the basin, an annual financial contribution to the GSA by the County of Sonoma and Sonoma Water would result in the fee only being paid by major municipal pumpers (the cities of Cotati, Rohnert Park, Santa Rosa and Sebastopol; the Town of Windsor; and Sonoma Water). The financial contribution would offset the fees that would otherwise be paid by all non-municipal groundwater users, including rural residential well owners, farmers and businesses through June 2022.

The groundwater user ordinance would be rolled out over three years and would add groundwater user information to a GSA database. People would be notified via mail about the registration program. They would not be required to take any action, but would have an opportunity to share information with the GSA about their well, water quality issues and groundwater use through an on-line or paper system.

Go to santarosaplainingroundwater.org (<http://santarosaplainingroundwater.org/>) for the meeting agenda, materials and to view the fee resolution, groundwater user ordinance and other materials.

SGMA defines sustainable management as:

“Management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results.”

The Santa Rosa Plain GSA will be tracking six main sustainability indicators:



Lowering Groundwater Levels



Seawater Intrusion



Reduction of Storage



Land Subsidence



Degraded Groundwater Quality



Surface Water Depletion

The Santa Rosa Plain GSA will be tracking six main sustainability indicators:

For more information about groundwater, visit our [Understanding Groundwater page](http://santarosaplainingroundwater.org/gw/) (<http://santarosaplainingroundwater.org/gw/>) (<http://santarosaplainingroundwater.org/gw/>) or read our [Groundwater Primer](http://santarosaplainingroundwater.org/wp-content/uploads/5-7-18-Groundwater-Primer.pdf). (<http://santarosaplainingroundwater.org/wp-content/uploads/5-7-18-Groundwater-Primer.pdf>)

ABOUT THE RATE AND FEE STUDY

The Sustainable Groundwater Management Act (SGMA) was passed into California law in fall 2014. The Act requires that State-designated medium (including Santa Rosa Plain) and high priority basins form a GSA and develop a Groundwater Sustainability Plan (GSP). In compliance with SGMA, the Santa Rosa Plain GSA was created in June, 2017.

GSA member agencies contributed funds to pay for the first two years of GSA operating costs. Raftelis (a financial consulting firm) began a fee study in December 2017 to develop options for funding the agency through 2022, when the GSP is completed. In spring 2018, the GSA was awarded a \$1 million Proposition 1 grant from the California Department of Water Resources (DWR) for developing the GSP. The grant funds significantly offset GSA costs. Funding is needed to cover the remaining operating costs of approximately \$337,000 annually.

P4165

note Strict constitutional requirements on fees and taxes narrowed the funding options to a fee based on actual or estimated groundwater use. Dividing the annual cost of operating the GSA -- \$337,000 -- by the estimated annual groundwater extraction from the Santa Rosa Plain basin (16,934 acre-feet) equals a rate of \$19.90 per acre-foot. This rate is half of the \$40 per acre-foot rate that the state established it would charge groundwater users in the Santa Rosa Plain if the state were to intervene. With a rate of \$19.90 per acre-foot multiplied by the actual and estimated use factors, the following fees are proposed:

- Rural residential groundwater users would pay \$9.95 per year
- Large groundwater users would pay \$19.90 per acre-foot of water pumped annually (for example, a vineyard with 100 acres of irrigated vines (60 AFY) would pay \$1,194 annually)
- Urban well owners would pay \$1.99 per year

As noted above, a contribution by the County/Sonoma Water would offset the fees for all but municipal groundwater pumpers (the cities of Cotati, Rohnert Park, Santa Rosa and Sebastopol; the town of Windsor; and Sonoma Water). If the GSA does not impose fees, and as a result, cannot complete and implement the GSP, the state could intervene and impose fees that would range from \$100 annually for residential well owners to \$300 (base fee) plus \$40 per acre-foot of groundwater use for agriculture, cities, mutual water systems, golf courses and commercial users.

For more information about the Santa Rosa Plain GSA, go to www.santarosaplaingroundwater.org (<http://www.santarosaplaingroundwater.org/>).

Comments:

LOGIN TO MAKE A COMMENT [/https://www.sonomacountygazette.com/login/index.html?rtn=/sonoma-county-news/groundwater-agency-schedules-public-meeting-june-13-on-proposed-fee](https://www.sonomacountygazette.com/login/index.html?rtn=/sonoma-county-news/groundwater-agency-schedules-public-meeting-june-13-on-proposed-fee)

Please support our sponsors:



<https://www.sonoma-marinfair.org/tickets/>
 June 19-23, 2019
[sonoma-marinfair.org](http://www.sonoma-marinfair.org)
<http://www.sonoma-marinfair.org/>



GENEROUSLY SPONSORED BY AMY REEL/THE REEL FOUNDATION
<https://www.cloverdaleperformingarts.com/>
 Cloverdale Performing Arts Center
 209 N Cloverdale Blvd, Cloverdale
 (707) 894-2214

P.5 of 5

Taylor Blakslee

From: K. P. March <kmarch@bkylawfirm.com>
Sent: Friday, June 14, 2019 5:27 PM
To: Taylor Blakslee
Subject: To Cuyama Basin Groundwater Sustainability Agency, and to Jim Beck, its project manager: Some questions for you, Mr. Blakslee, and you boss, Mr. Beck

061419

To Cuyama Basin Groundwater Sustainability Agency, and to Jim Beck, its project manager

From Walking U Ranch, LLC by KPMarch, Esq., sole managing member of LLC

Mr. Blakslee/Mr. Beck:

When Mr. Beck and I spoke by phone earlier this week, I suggested to Jim Beck that he forward all my letters to GSA's water use attorney, Joe, and have Joe respond to me on the law that I briefed in the 3 letters.

Mr. Beck said he was going to forward my letters to GSA's water use attorney, Joe, and have the water use attorney reply to me re. the law briefed in my 3 letters.

Question: Have my 3 letters been forwarded to GSA's water use attorney, Joe, by either you, or by Becks? **REPLY and tell me please.**

If yes, when were my letters forwarded to water use attorney, Joe, and **when can I expect to hear from Joe.**

It is quite possible that GSA's water use attorney (Joe) will **agree that the controlling law is what I briefed, if Joe were to REPLY to my briefing, since the law I briefed is the controlling law.**

It could move things forward, before the July 10, 2019 Water Board meeting, if Joe were to REPLY to the briefing in my 3 letters (6/9/19, 6/12/19 and 6/13/19 letters), because I think Joe will agree with that briefing, and that will be the end of "per acre" assessment proposal.

Alternatively, if you/Beck do NOT promptly forward my 3 letters to GSA's water use attorney Joe, I will bring that failure up, at the 7/10/19 meeting, and it will be obvious to the Water Board that Mr. Beck does NOT want GSA's water attorney to consider the law briefed in my 3 letters. _

Reply please. Thx.

Also, the experienced water use attorney assisting me has found 2 additional GSPs in California, already adopted, which EACH assess landowners for GSP costs, **based on water use**, as California Water Code requires. Those are the GSP of the Kings River East GSA, and of the of the Indian Wells Valley GSA. I'll print some materials from the websites for each of those GSPs and will send those materials to you next week.

PS: please include this 6/14/19 email in the packet of materials you will be sending to each Water Board member, before the 7/10/19 meeting. Reply to confirm you will do so.

KPMarch

Kathleen P. March, Esq., sole managing member of
 Walking U Ranch, LLC
 10524 W. Pico Blvd, Suite 212
 Los Angeles, CA 90064
 Phone: 310-559-9224
 Fax: 310-559-9133
 E-mail: kmarch@BKYLAWFIRM.com
 Website: www.BKYLAWFIRM.com
"Have a former bankruptcy judge for your personal bankruptcy attorney"

From: Taylor Blakslee [mailto:TBlakslee@hgcpm.com]
Sent: Friday, June 14, 2019 4:27 PM
To: K. P. March
Subject: RE: To Cuyama Basin Groundwater Sustainability Agency, and to Jim Beck, its project manager: Please see attached letter attaching article that "Strict constitutional requiremens narrow fees [for GSPs] to a fee based on actual or estimated groundwater use

Will do.

Taylor Blakslee
 Project Coordinator
 (661) 477-3385



[To send me a file click here.](#)

Corporate (916) 923-1500
www.hgcpm.com

Confidentiality Note: The information contained in this email and document(s) attached are for the exclusive use of the addressee and may contain confidential, privileged and non-disclosable information. If the recipient of this email is not the addressee, such recipient is strictly prohibited from reading, photocopying, distributing or otherwise using this email or its contents in any way.

From: K. P. March <kmarch@bkylawfirm.com>
Sent: Thursday, June 13, 2019 5:03 PM
To: Taylor Blakslee <TBlakslee@hgcpm.com>
Subject: RE: To Cuyama Basin Groundwater Sustainability Agency, and to Jim Beck, its project manager: Please see attached letter attaching article that "Strict constitutional requiremens narrow fees [for GSPs] to a fee based on actual or estimated groundwater use

Thx, please give both to Jim Beck.

Kathleen P. March, Esq.
 The Bankruptcy Law Firm, PC
 10524 W. Pico Blvd, Suite 212
 Los Angeles, CA 90064
 Phone: 310-559-9224
 Fax: 310-559-9133
 E-mail: kmarch@BKYLAWFIRM.com
 Website: www.BKYLAWFIRM.com
"Have a former bankruptcy judge for your personal bankruptcy attorney"

From: Taylor Blakslee [<mailto:TBlakslee@hgcpm.com>]

Sent: Thursday, June 13, 2019 4:56 PM

To: K. P. March

Subject: RE: To Cuyama Basin Groundwater Sustainability Agency, and to Jim Beck, its project manager: Please see attached letter attaching article that "Strict constitutional requiremens narrow fees [for GSPs] to a fee based on actual or estimated groundwater use

I replied to your later email, but just to confirm, I received this email and the attached letter.

Thank you,

Taylor Blakslee

Project Coordinator

(661) 477-3385



[To send me a file click here.](#)

Corporate (916) 923-1500

www.hgcpm.com

Confidentiality Note: The information contained in this email and document(s) attached are for the exclusive use of the addressee and may contain confidential, privileged and non-disclosable information. If the recipient of this email is not the addressee, such recipient is strictly prohibited from reading, photocopying, distributing or otherwise using this email or its contents in any way.

From: K. P. March <kmarch@bkylawfirm.com>

Sent: Thursday, June 13, 2019 12:00 PM

To: Taylor Blakslee <TBlakslee@hgcpm.com>

Subject: To Cuyama Basin Groundwater Sustainability Agency, and to Jim Beck, its project manager: Please see attached letter attaching article that "Strict constitutional requiremens narrow fees [for GSPs] to a fee based on actual or estimated groundwater use".

061319

To Cuyama Basin Groundwater Sustainability Agency, and to Jim Beck, its project manager:

Please see attached letter attaching article that "Strict constitutional requiremens narrow fees [for GSPs] to a fee based on actual or estimated groundwater use".

Please include this letter and article in the packet you will be giving Water Board members for the July 10, 2019 Water Board meeting in cuyama. **Please REPLY to this email Mr. Blakslee, to confirm you/Mr. Beck will do this. Thx.**

KPMarch

Kathleen P. March, Esq.
The Bankruptcy Law Firm, PC
10524 W. Pico Blvd, Suite 212
Los Angeles, CA 90064
Phone: 310-559-9224

Fax: 310-559-9133

E-mail: kmarch@BKYLAWFIRM.com

Website: www.BKYLAWFIRM.com

"Have a former bankruptcy judge for your personal bankruptcy attorney"

Letter to GSA Board

Joe Haslett [joe.haslett59@gmail.com]

Sent: Sunday, July 07, 2019 6:13 PM

To: Taylor Blakslee

Dear Taylor,

Can you please forward the following comments to the GSA Board?

Thank you,

Joe Haslett

To: Derek Yurosek, Chairperson, CBGSA
& Board Members

From: Joe Haslett

Land Owner, 160 Acres
2875 Cottonwood Canyon Road

RE: Notice of Intent to Adopt the GSP

I am writing to you as a Land Owning Stakeholder of 20 years in what is described as the Western area of the CBGSA. We have a small farming operation and will be full time residences in the coming months. The decisions the GSA Board makes in the adoption and implementation of the GSP will significantly affect the long term viability of our property.

I wish to congratulate the Board, consultants and managers, also the SAC, for getting the GSP this close to the finish line. As you consider the adoption of the GSP I believe there are several points that need to be considered and incorporated into the plan.

The first is the management of the Central Region Management Area. I strongly support the Cuyama Basin Water District to have the over site and responsibility to implement any and all management actions needed satisfy the requirements of the GSP for the area. Since this is ground zero of the "overdraft" issue, I believe that those who own and farm the land should have control over solving the problem, they have the resources, expertise and motivation to do so. It is in their interest to have their operations continue, on a sustainable level, for years to come. The CBWD would still need to report to the GSA Board, but it would reduce the costs directly born by the GSA. The CBWD management of the Central Area should be included in the GSP. I also believe that the area around Ventucopa should Not be a Management Area, the well, used to make this decision, is old, shallow and not representative, if anything is to be done the GSA should implement the idea of assisting in obtaining a grant to install a new reliable well for the community water supply, there should not be any long term management for the area.

My second point has to do with water quality, before the GSP is adopted there needs to be Real clarification in regards to the standards to be set in regards to Total Dissolved Solids that would trigger undesirable results. Using California Drinking Water as a standard is Not applicable, it would only apply to the CCSD water supply, which already is required to meet State water quality standards, any where else, what the water quality is, is what the land owner has to live with, good or bad, for what the intended purpose of the use is, farming, ranching or domestic, that is up to the land owner, if the TDS causes an issue, then you don't use the water for that purpose. One person's "undesirable" TDS can be just fine for another. The idea of TDS being used is very subjective and has not been clearly defined, this needs to be done before the GSP is adopted.

The next area that Must be defined in the GSP is the term "Benefit", what does that mean relative to all landowners in the CBGSA?

The areas outside of the Central Area, with groundwater supplies being maintained at sustainable levels, derive no "Benefit" whether or not the groundwater becomes 'sustainable' in the Central Area. Is there a benefit to simply being a landowner in the CBGSA, perhaps so only because it is mandated by the state, but there is no value to fixing the water problem in the Central Area for the vast majority of the CBGSA landowners. Conversely, those in the Central Area will derive a direct benefit and value to reaching a sustainable groundwater result.

The Financial component of the GSP is crucial to making informed decisions, just because SGMA does not specifically require it, it is not an excuse to not have financial information as part of the plan. The lack of a financial analysis is a stain on the work that W&C have performed for the CBGSA, I believe many of the decisions made over the course of the planning process would have had different out comes if the financial ramifications were considered when the decisions were made.

To finance the GSP, I Do Not, under any circumstances, support an "Acreage" based fee, to do so would be fundamentally wrong and add an additional Tax burden to what property owners already have to pay for a variety of government imposed fees. Extraction (pumping) is the only alternative, however any fee structure should be on a tiered basis, with those extracting the most, paying the most, with a sliding scale lower for those that don't. There should be a "De Minimis" level set to protect domestic, ranching and small farm (<100 acre feet of water) use from the cost burden, especially as these users have been shown to be operating on a sustainable basis. This needs to be a part of the GSP before it is adopted.

Another point of the financial component, the "Budget" to continue the operations of the GSP. The budget should be set to what revenues are, not the other way around, the dollar amounts projected at the most recent GSA meeting are vastly inappropriate to what is affordable for the area and it is irresponsible to ask the Landowners of the entire CBGSA to fund what is a localized issue. This includes any 'projects' to assist in the mitigation of the over draft in the Central Area, this should be left to the CBWD to work into their management plans.

The last item that I believe needs to be incorporated in the GSP is a recommendation to DWR to adjust the boundary lines of the CBGSA. The gerrymandered looking border in the northeast & eastern end does not make sense and the same for the most western/northwestern portion, the fingers that incorporate range land, these areas should only qualify as De Minimis at best and should be removed from the CBGSA. I have long argued that the Western area has a separate hydrology from the rest of the CBGSA, W&C proved that in their presentations and analysis, showing that the groundwater Schoolhouse and Cottonwood Canyon receive are supplied as drainage from the Sierra Madre mountains, as W&C showed, this groundwater is Transitory (Websters definition - of brief duration: Temporary, tending to pass away: not persistent), moving from higher elevations to lower, ending up at the Cuyama River, continuing down stream away from Cuyama Valley proper. This and all areas of the CBGSA that have transitory groundwater should be removed from the CBGSA as the concept of "storage" that the plan relies on to quantify undesirable results is not valid. The USGS Study Area Boundary in the eastern region could be used to correct that boundary area, starting at approximately the SLO/Kern County line going east and south. The USGS SAB could also be used in the western part, continuing west as a narrow band along the Cuyama River to pick up the North Fork Vineyard (just the vineyard, not the range land) I suggest this even though this area receives groundwater from Schoolhouse Canyon and really should be excluded. The rest of the Western and Northwestern areas should be removed from the CBGSA boundary area. Other transitory groundwater properties should be considered for exclusion as they are identified (Caliente Ranch is an example) All of this needs to be in the GSP so that it can be considered by DWR, since DWR set the boundary lines.

The GSP is overall a perfectly fine plan to pass the DWR approval process, all the boxes are checked, all of the procedures, out reach and other requirements have been met. As a plan to utilize to achieve the sustainability goals it will get us close, but there are many flaws that will need to be teased out and fixed. My suggestions are intended to help in that regard and take out uncertainty that is the biggest flaw of the plan, that is - how will the plan financially burden landowners who are not responsible for the Over Draft in the Central area, those that operate sustainably, see no benefit or value and really don't want any part of the GSP, but are forced to. Will the financial burden of the GSP affect their ability to continue to live, work and invest in/on their property, this is the fundamental question that the GSP and the GSA Board have not answered. This needs to be addressed before the GSP is adopted.

My last comment is that decisions affecting Land Owners should be made by Land Owners, those with out a financial stake in the outcome should not be able to influence decisions that others will end up paying for.

Thank you for your attention.

Sincerely,

Joe Haslett