

**EASTERN MANAGEMENT AREA  
CITIZEN ADVISORY GROUP  
MEMORANDUM**

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DATE: October 11, 2021

TO: EMA GSA Committee

FROM: EMA Citizen Advisory Group  
Prepared by Elizabeth Farnum

SUBJECT: EMA Public Draft of GSP and Discussion of Future Governance

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**Eastern Management Area (EMA) Citizens Advisory Group (CAG) Members**

CJ. Jackson, Gay Infanti, Sam Cohen, Mary Heyden, Elizabeth Farnum, and Tim Gorham,

**Introduction**

The EMA CAG held a meeting on October 11, 2021 via teleconference to review the Public Draft of the Groundwater Sustainability Plan (GSP) and discuss future governance options for the GSA.

Below is a summary of the CAG's comments.

**CAG Comments on the GSP:**

As at previous CAG meetings, some members indicated that the GSP does not reflect the urgency of the moment, i.e., continuing drought and climate change. Because the GSP does not include data from the past three years, two of which have been drought years, there is a cognitive dissonance to a reader from the general public. An average of data from 1989-2018 doesn't reflect current weather trends. The well hydrograph section in Appendix D shows a significant water level drop in some wells. The consultant pointed out that the GSP requires an annual report, which will update information each year. This annual update/review will allow for GSP adaptation based on, for example, a continued drought.

A CAG member observed that in light of a projected increased deficit, the GSP doesn't seem proactive.

While some CAG members felt that the GSP overall was well done, others worried that the public would have trouble understanding how it operates in real time. Planning for an agricultural operation requires knowing how and when management actions would be applied. Other CAG members commented that the GSP is too complex and long for most people to read.

The highlighted SGMA citations are confusing. The consultant explained that the GSP format adheres to SGMA requirements. The GSP is written for DWR which is a very different type of audience than the general public.

It was suggested by the CAG that the overview of the GSP presented to the GSA on August 26, 2021, would provide the general public with a higher-level understanding of the GSP. Staff noted that the presentation is available on the website. A CAG member remarked that flow charts are helpful as well.

A CAG member questioned the absence of language in the GSP regarding a prohibition on new wells. The consultant acknowledged that recording requirements for new wells is an issue in all the basins and that there is a lot of new drilling. The GSA doesn't have the authority to stop this.

Another CAG member expressed a concern that although the agricultural community's water rights will be affected greatly by the management actions, it has no direct representation on the GSA.

A CAG member asked if the GSP would create redundancies between GSA staff and SYRWCD staff regarding the collection of well data. Another redundancy might occur in the creating/funding of water efficiency programs between the GSA staff and the Cachuma Resource Conservation District.

The CAG discussed the 20- and 40-year SGMA reporting horizons and commented this time frame seemed too long for achieving sustainability. The consultant responded that the GSP uses five-year increments and interim milestones to measure progress or to reassess and possibly correct the course by adjusting management actions.

### **CAG Comments on Future Governance:**

The CAG discussed governance options 3 and 4 as the most reasonable, but staff guidance on this is needed. Most CAG members did not understand how the JPA structure would work in practice. All supported the goal to develop a structure that would allow for the most cost sharing.

The CAG did not have time to discuss funding mechanisms. Members questioned the budget numbers associated with each management action. There was further discussion that estimates for some management actions contained a pretty wide range of costs. One CAG member noted that a budget would have to change to be consistent with a GSP that is constantly updated.

Staff mentioned that more well owners are voluntarily adding their wells to the monitoring network. This would significantly reduce costs in the first set of management actions. The CAG discussed that it is very important to convince well owners to participate in the volunteer monitoring program.

There were no further comments, and the meeting was adjourned.