

Received via e-mail from Doug Engfer, Director Santa Margarita Groundwater Agency, City of Santa Cruz representative

### Specific to Periodic Evaluation

My comments on and questions relating to the PE:

- [Page 4-2] Reference made to SLVWD conjunctive use of 313 AFY of Loch Lomond water. While characterized as “likely” (as opposed to, say, stating a commitment), it’s my understanding that SLVWD is wavering in its commitment to the use of that water. I believe that this is an ongoing discussion at SLVWD. Please confirm that SLVWD and SCWD staff are comfortable with this characterization. (Or, maybe I’m mis-reading the context here, and this is meant to re-state the 2022 document? If so, that should be made more clear to the reader.)
  - [Page 5-5] Note that “ PMA 7 is being eliminated at the request of the project proponent as it is not cost effective” - this is the 313 AFY conjunctive use item...
- [Page 4-14] As relates to SMGWA-6, do I read that chart correctly when I perceive a worrying trend line in the GW elevation readings (the black declining line on the RHS of the graph)? If so, does this warrant commentary or concern?
- [Page 4-21] Reference is made to “ 5-year rolling forward average”. I think you may mean a 5-year trailing average? To me, a “forward average” would be based on forecasts, which are meaningless to me in our line of work. Please clarify.
- [Page 4-25] Document states “... and are not attributable to groundwater management practices” as relates to MT exceedances in GW quality. DWR took us to task regarding GW levels when we used similar logic (“we didn’t cause it; why should we be responsible?”) - are we comfortable with this language, or may we choose to delete that clause?

### Specific to Groundwater Sustainability Plan

My main observation (besides a few stray unresolved references), is the potential utility of a “guide document” that identifies the intent of each significant change.

I was struck by how many changes there were (beyond the key topics that we discussed at the committee). As I read through the blue-line, I “soft identified” a handful of categories of changes, including:

- Editorial

- Improved information available
- Change to SMC, etc.
- Reorganization
- Etc.

It occurred to me that there may be value to the State reviewers (and to us!) to have such a guide document. For the State, it allows them to read the changes through the correct lens. For us, it would possibly deflect inappropriate or off-target State feedback. I recognize that it would be non-insignificant work to do this; I leave it to you to determine whether the investment in such a document would pay off in more-efficient interactions with the State.

Other than that, I commend staff for your great work here. So thorough!

Doug