

Ukiah Valley Groundwater Basin

Groundwater Sustainable Agency

Review Form

Ukiah Valley Basin Groundwater Sustainability Plan

Dear Reviewer,

Per SGMA requirements, a Groundwater Sustainability Plan (GSP) is under development for the Ukiah Valley Groundwater Basin (UVBGSP). Ukiah Valley Basin Groundwater Sustainability Agency (UVBGSA) welcomes feedback on draft sections of the GSP by the broad interests and perspectives of the public.

REVIEWER INSTRUCTIONS:

Given the large number of reviewers, accommodating track changes or other editing options within the original draft sections distributed to all committee members can be challenging. As an alternative to tracked changes editing, please consider using this reviewer form with the following instructions:

- Use the form below to provide comments. Feel free to expand the form as needed.
- For suggested text changes, please copy and paste the text you wish to change and place your suggested edits in track changes or strikethrough features in this document. What is important is that technical staff can see *both* the original draft text and your distinct suggestions.
- Note the line number—from the ***PDF version*** of the draft GSP section—where your comment, question or suggested text edit begins.
- Examples of how to provide feedback are listed in the review form below. Feel free to delete these examples with your submission, and only include your feedback.

Please email comments directly to Amber Fisetta (fisettea@mendocinocounty.org), with a Cc to Technical Consulting Team Lead Laura Foglia (lauraf@lwa.com). Please use the following file nomenclature in saving your review document:

UVBGSP_Public Review_[Your name]_date

Please send your comments no later than September 24, 2021.

Thanks for contributing to the draft GSP for the Ukiah Valley Groundwater Basin.

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Reviewer name: James Sullivan

Submission date: 9/24/2021

GSP sections reviewed: **GSP Public Draft and emphasis on Sections 3, Chapters 4 and 5.**

Line number	Suggested revision (<i>please delete example text below once you submit</i>)
General Comment	I appreciate the opportunity to comment upon the Draft UVGB GSP and ongoing effort the GSA is investing in the SGMA effort. I have reviewed the referenced document and have a general comment that applies to the entire GSP. The document does not emphasize enough the need for a substantial investment towards installation of strategically located surface and groundwater monitoring locations to fill data gaps. As stated within the GSP, the Ukiah Valley groundwater basin is not currently adequately monitored. The success and relevance of the GSA will depend upon early projects investigating areas needing immediate installation of additional monitoring infrastructure and acquisition of resulting monitoring results prior to implementation of many of the PMA's. More data will be necessary for implementing meaningful PMA projects to protect and improve the health of the UVB aquifer and connected hydrology.
Section 3, lines 631 thru 633	At this time the statement: "Chronic well outages are not expected in Ukiah Valley due to the lack of long-term overdraft and seasonal variation in water levels." cannot be supported given the lack of adequate spatial data supporting time series groundwater recharge rates and long-term groundwater water level monitoring data. Suggest such statements be avoided within the GSP without supporting data and evidence.
Section 3, lines 1945 - 1962	Suggest that this is where the GSA initial energy and efforts focus upon. This section is the "KEY" to the GSA's success in management of SGMA. Without a pathway to achieve measurable objectives, and understanding the ISW's all efforts will have limited meaningful results. As stated many times within the GSP, at this time the basin is not monitored adequately. Conclusions within the GSP of the "health" of the aquifer cannot be adequately supported, promoted or stated other than without an adequate monitoring network of groundwater and surface water gauging this basin will not be adequately characterized. Promoting that the basin is healthy at this time cannot be support, and should not be promoted other than more information is necessary. This section needs stronger language and specific areas proposed to improve knowledge of groundwater and surface water conditions and the importance of the need for additional Basin monitoring. The pathway to achieve measurable objectives starts with designing and implementing an adequate monitoring network, which includes ISW's. Strongly suggest the use of "may" be used less in this vision document and the action verb of "will" be used to demonstrate the commitment the GSA in this effort. Especially the last sentence in this section...The GSA may will identify knowledge requirements, seek funding and help to implement additional studies.

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Chapter 4

General Comment: Without an integrated groundwater/surface water monitoring network achieving the GSP sustainability goals are abstract and easily ignored. The GSA needs to know the science before it can propose the solutions. Chapter 4 is where the GSP should have a blueprint for the GSA to act upon. Increased monitoring (both quantity and quality) should be more specific throughout the document and not as general, as presented. Adequate monitoring networks and their results will be the driver for projects to reach SGMA goals. Chapter 4 needs to expand upon monitoring generalities to establish concrete goals in establishing an adequate monitoring network as the keystone project in which each of the GMP PMA's effort will be based upon. As an example, in Section 3 part 3.4.3 Minimum Thresholds-Chronic Lowering of Groundwater Levels (lines 672 and 673), continuous groundwater monitoring is proposed to gather information on an identified data gap in the identification of high and low seasonal groundwater levels...This level of detail should be included and expanded upon in Chapter 4 as an opportunity to specify tasks.

