

EASTERN MANAGEMENT AREA  
CITIZEN ADVISORY GROUP  
MEMORANDUM

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DATE: February 23, 2023  
TO: EMA GSA Committee  
FROM: EMA Citizen Advisory Group  
Prepared by Tim Gorham  
SUBJECT: Review of EMA draft policy options for new well verifications

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

Mary Heyden, CJ. Jackson, Gay Infanti, Elizabeth Farnum, Kevin Merrill and Tim Gorham

**Introduction**

The EMA CAG held a meeting on February 21, 2023 via teleconference to discuss the “Draft Policy Options for New Well Verifications by the EMA GSA”.

**Below is a summary of the CAG’s comments:**

- Before reviewing the four draft policy options for well verifications the CAG discussed the limited amount of control wells used by the EMA GSA. The CAG also discussed the need for more control wells and to be distributed more evenly within the EMA.
- The CAG also asked for clarification to the definition of “Undesirable Results” requiring two years of average or above average rainfall. There was concern that two years of average or above average rainfall was potentially difficult to achieve based on the current climate outlook. It was explained by Staff that requiring two years of average or above average rainfall would allow the GSA to evaluate the effects of pumping on the groundwater table.
- The CAG next discussed each of the four draft policy options for new well verifications presented to them by the EMA staff.
  - **Option 1: Continue to Review Requests for Well Verifications until Undesirable Results Occur**
    - Some in the CAG felt Option 1 was currently a GSA accepted method of evaluating new well verifications and we need to continue using it going forward.
    - Others in the CAG felt that the newly reported data from October water well levels showing over 50% of the control wells had fallen below Minimum Thresholds required a new method to evaluate new well verifications.

- **Option 2: Deny Pending Verification Requests and Cease Accepting New Requests Based on Imminent Occurrence of Undesirable Results**
  - It was unanimous from the CAG that Option 2 was not an acceptable option.
- **Option 3: Hold All New and Pending Requests for Well Verifications in Abeyance Pending Review of March 2023 Water Levels**
  - Several of the CAG members felt Option 3 was an acceptable option because it allowed the GSA to gather more control well water level data in the Spring before approving any new well permits.
  - Others in the CAG felt we should not change the current method of new well approval at this early point in the process. The GSP is a long-term process of reaching sustainability and we should not change the course of action.
  - Others commented on the recent heavy rains would question the “credibility” of the GSA if we stopped approving new wells at this point.
  - Option 3 was considered by some as a short-term option.
- **Option 4: Continue to Review Requests for Well Verifications on Interim Basis Based on Water-Budget Parameters and Considerations Contained in EMA GSP**
  - The CAG discussed Option 4 and felt it was a little confusing and hard to understand.
  - Some felt that the GSA and GSI Water Solutions should be doing this analysis anyway. It was pointed out by Staff that this work is not ongoing at this time.
  - Most in the CAG was not sure of this option and felt it was too vague.

After lengthy discussion, the CAG group of six was evenly split in supporting Options 1 and 3. Three CAG members supported Option 1 and three CAG members supported Option 3.

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