

EASTERN MANAGEMENT AREA
CITIZEN ADVISORY GROUP
MEMORANDUM

DATE: March 23, 2023
TO: EMA GSA Committee
FROM: EMA Citizen Advisory Group
Prepared by Gay Infanti
SUBJECT: Review of Draft Policy Options for Well Verification Requests

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

In attendance were the following CAG members: Sam Cohen, Elizabeth Farnum, Mary Heyden, Gay Infanti, CJ Jackson, and Kevin Merrill. Absent: Tim Gorham

Introduction

The EMA CAG met on Wednesday, March 15, 2023 to discuss the updated draft policy options for well verification requests.

At the February EMA GSA meeting, the CAG reported that, due to the data from the October 2022 measurement of representative wells, which revealed that 50% of them had already reached minimum thresholds, the CAG was split 50/50 as to whether well verification requests should continue to be processed as usual (Option 1), or whether they should be held in abeyance until the March 2023 measurements were available (Option 3). There was no CAG support for Option 2, but several CAG members viewed Option 4 as the way forward once more process clarification and criteria for approval were developed. At the conclusion of the GSA meeting, GSA Member Supervisor Joan Hartmann requested the establishment of more defined criteria for the well verification process to guide the GSA in their decision making process.

The EMA GSA staff met on March 15th to refine the draft policy options and, later that day, presented their updated proposed options to the CAG for discussion. Each of the staff's four options were presented and discussed. The discussion ultimately focused on elements of the GSP that would provide more detailed criteria for GSA decision-making and management of the well verification process going forward

Below is a summary of the CAG's comments:

The context of this discussion relative to Option 1 is that, although 50% of representative wells were at or below minimum thresholds, we haven't yet had two consecutive average or above average precipitation years, which as CAG members pointed out is part of the minimum threshold definition. Others expressed the concern that it's unlikely we'll get two of these years consecutively and, if the wells don't recover, the groundwater level/storage will continue to decline – especially if a lot of new wells are permitted in the basin. One CAG member asked

whether GSI was tracking the cumulative potential impact of new well verification request approvals in their analysis of applications. Another asked whether the consideration of potentially reduced water usage was taken into account in the GSI analyses, for example after this year's significant rainfall. These questions raised the issue of how the water budgets in the GSP were developed, which as staff explained included several assumptions such as population growth and land use over time, and how the water budgets should be used to evaluate well verification requests (see Option 4 discussion below).

Option 3, which would hold well verification applications in abeyance until the March 2023 measurements were available, was revised by Staff to add that if the March measurements show that 50% of representative wells are above minimum thresholds, then applications that had been held in abeyance could then proceed. This approach would simply look at measurements at specified intervals (currently every 6 months) and hold applications in abeyance whether there are 2 consecutive wet years or not. This raised two concerns from some CAG members, first that the SGMA process for achieving sustainability is intended to be a long-term process but Option 3 is more of a short-term one. Second, measurements taken in March may not be accurate if there has been insufficient time for the rainfall to percolate into the groundwater basin. The CAG is still divided on Option 3, however it was agreed that if the GSA chooses Option 3, only applications not already in the process of verification should be held in abeyance.

Option 4 proposes that well verification requests continue to be reviewed by the GSA based on undesirable results, water budget parameters and other considerations in the EMA GSP, such as the results of various management actions. Staff noted that trending groundwater declines warrant careful review of all verification requests to ensure they are consistent with any sustainable groundwater management programs in the GSP and will not decrease the likelihood of achieving the EMA's sustainability goal (defined and implemented according to long-term considerations and avoidance of undesirable results).

There was some consensus among the CAG that Option 4 is the preferred way forward. However, there was concern expressed that adaptive management as described in Option 4 will require that more questions be asked and more data be developed and analyzed before new well verification requests are approved. Trends will need to be tracked and management actions taken to ensure sustainability is achievable by 2042. Consideration of new well production and increased water usage will need to be compared to the water budgets, and the assumptions used to develop them, as well as potential offsets such as changes in land use and water conservation programs.

One CAG member opined that management of the EMA comprises an effort to achieve balance between water availability and water use. Even though sustainability is a long-term concept, there are some immediate actions or responses that can be taken to avoid chronic lowering of our groundwater levels and avoid other undesirable results. And further, the GSA needs to take the management actions described in our GSP to gather data/analyze the resulting data to ensure we can achieve sustainability in 20 years.

There was also consensus among the CAG that adaptive basin management will be complex and it's currently unclear how all this will work. There is a lot to consider and digest. It is also clear

that there are currently insufficient resources to achieve all of this. Concern was expressed about the complexity, who will be tasked with the effort, and how much it will cost. The CAG agreed on the need to get the governance worked out quickly so we can get started on our GSP's projects and management actions.

Lastly, it is understood by the CAG that there is an opportunity to update the GSP at 5-year intervals depending on the accuracy of the assumptions in our GSP, which will likely need to be reevaluated as new information becomes available to validate them, as well as, the implementation and results of our projects and management actions.

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