



Tim Carson &lt;admin@midcountygroundwater.org&gt;

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**Redirect Storm Drains to our Aquifers**

2 messages

**Douglas M Thomson Sr.** <douglasmthomsonsr1@yahoo.com>

Mon, Sep 16, 2024 at 7:01 AM

To: "comment@midcountygroundwater.org" &lt;comment@midcountygroundwater.org&gt;

Millions of gallons of water from our storm drains are dumped into our ocean. The water could be captured and diverted back into our aquifers.

Capture and divert more creek and river water to our treatment plant before it enters the ocean. During the rainy season this water could be diverted into our aquifers instead of allowing it to enter our ocean.

Farmers should be required to install cisterns and or drainage systems to divert their water runoff into onsite treatment systems so the water can be recycled and used multiple times or diverted to our aquifers.

***Very Respectfully,***

***Douglas M. Thomson Sr.***

***Retired Distinguished Naval Veteran***

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**Santa Cruz Mid-County Groundwater Agency** <admin@midcountygroundwater.org>

Mon, Sep 16, 2024 at 9:38 AM

To: "Douglas M Thomson Sr." &lt;douglasmthomsonsr1@yahoo.com&gt;

Mr. Thomson,

This email confirms receipt of your comment submitted via email on the Santa Cruz Mid-County Groundwater Agency's Draft Periodic Evaluation of the Groundwater Sustainability Plan. Thank you for your interest in groundwater management in the Santa Cruz Mid-County Groundwater Basin.

Best regards,

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*Administrative Services*

*Santa Cruz Mid-County Groundwater Agency*

[admin@midcountygroundwater.org](mailto:admin@midcountygroundwater.org)

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Tim Carson &lt;admin@midcountygroundwater.org&gt;

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**Comments on Draft Periodic Evaluation**

2 messages

jarickersc@gmail.com &lt;jarickersc@gmail.com&gt;

Wed, Sep 18, 2024 at 5:51 PM

To: comment@midcountygroundwater.org

Overall this is a good report with thorough information and well-developed findings.

As a domestic well user in the basin, I concur with the report's analysis and conclusions regarding DWR's recommended corrective action.

I look forward to future analyses of data relative to interconnected surface water and to the implementation of the pending projects, which should not only raise coastal groundwater levels, but also benefit groundwater levels near streams.

A few specific comments:

P. 3-11: Domestic wells are completed in igneous rock in the western part of the basin, not the eastern.

Table 3-1: Private well #1 is actually a monitoring well located 110 ft from the nearest production well.

Table 7-8:

- Table 7-8 indicates that the MGA has taken over monitoring the lower West Branch, but that location is not shown on Figures 7-1 or 7-4. That would be a valuable site to maintain.
- The table indicates that the USGS gage for Soquel Creek at Soquel, has data going back to 1988. That date is consistent with the USGS website indicating instantaneous data availability. However, it should be noted that the USGS has daily flow data for that site going back to May 1, 1951.
- Correction: Soquel Creek Above West Branch Confluence was replaced by East Branch Soquel Creek above West branch Confluence. Was the station actually moved or just renamed?
- Correction: Soquel Creek Above Bates Creek was replaced by Soquel Creek at Cherryvale

Thank you for your good work and the opportunity to comment

John Ricker

Moore's Gulch Watershed

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**Santa Cruz Mid-County Groundwater Agency** <admin@midcountygroundwater.org>

Thu, Sep 19, 2024 at 7:32 AM

To: Rob Swartz &lt;rswartz@cfsc.org&gt;, Tim Carson &lt;tcarson@cfsc.org&gt;

Comments from John Ricker

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Tim Carson &lt;admin@midcountygroundwater.org&gt;

## PUBLIC COMMENT re: MidCounty Groundwater Agency Draft GSP Periodic Evaluation

3 messages

Becky Steinbruner &lt;ki6tkb@yahoo.com&gt;

Thu, Sep 19, 2024 at 2:29 PM

To: MidCounty Groundwater Agency Board &lt;comment@midcountygroundwater.org&gt;

Cc: Becky Steinbruner &lt;ki6tkb@yahoo.com&gt;

Dear MidCounty Groundwater Agency Board,

I appreciated the notice to the public provided in the Santa Cruz Sentinel "Coastlines" on Monday, September 16, 2024. Had I not seen that notice, I would not have known that public comment period on the Draft GSP Periodic Evaluation is open through your Board's consideration of the matter on September 19 during your meeting.

Below are my comments:

### 1) Legal Challenges (10-2, page 150)

As the pro per litigant, I want to make it clear that I have taken all action in good faith and solely for public benefit. There are many people in the Community who are worried about the implications of this Project, both environmental and related to long-term health impacts of vulnerable segments of the population.

The reason I have been compelled to file multiple legal challenges is because it is the only remedy available to the public when the District changes the Project substantially and refuses to commit to providing public comment via a Subsequent EIR. Although I have requested the District Board to address many concerning issues as the Project has been modified via two Addendums and not even provided for noticed public hearings, the District has been uncooperative. The District has rejected my multiple requests for mediation, and has rejected all offers for out-of-court settlements.

Soquel Creek Water District has been uncooperative in addressing critical issues, such as failure to provide adequate analysis of potentially significant and adverse structural changes and seismic impacts to the Laurel Street Bridge over the San Lorenzo River caused by removal of concrete ballasts and addition of the 14" fluid-filled conveyance pipelines installed on both sides of the Bridge. The District failed to analyze potentially significant and adverse impacts of the chloramine-laden effluent and contaminant brine in the conveyance pipes should there be a leak, with no on-site system shut-offs to halt the effluent flow into the San Lorenzo River. Chloramine is not volatile, is highly toxic to all aquatic life, and would persist in the San Lorenzo River water if there were a leak or rupture.

The PWS injected effluent into the Purisima Aquifer is anticipated to contain 33mg/l chloride and 1/67mg/l nitrate. In my opinion, this will threaten the success of the GSP because chloride is an indicator, and the PWS will inject 1,500AF/Y with chloride-laden effluent that is well above the ambient 0.06mg/l chloride in the Purisima groundwater. The Central Coast Regional Water Quality Control Board staff report, citing the Final Anti-degradation Analysis Report released in November, 2023 for the Permit Order R3-2023-0033 to allow PWS injection conceded that **the Project water will degrade the high-quality groundwater of the Purisima aquifer.** [https://www.waterboards.ca.gov/centralcoast/board\\_info/agendas/2023/dec/agenda\\_dec.pdf](https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2023/dec/agenda_dec.pdf)

This should not be allowed to happen, given there is a safer alternative supply available and under development with the City of Santa Cruz ASR project.

**2) "Water use in general, and especially groundwater extraction, continues to decrease in response to effective water conservation programs. Water Year 2023 had the lowest total municipal water use since tracking began in 1984, despite increasing population over that period."** (page 14, ES-5)

This is very good news and demonstrates the importance and effectiveness of conservation. Therefore, the GSP should include guidance to all member agencies of the GSA that they should strive to continue and even enhance their policies to provide existing and future water users incentives promoting conservation.

**3) "Coastal chloride concentrations are generally stable or decreasing over the evaluation cycle. The exception is in the southeastern portion of the Basin at Seascape where increasing chloride**

**concentrations occurred at depths shallower than historically observed despite the protective groundwater elevation being met in the area's Purisima F unit representative monitoring well."**  
(page 12, ES-3)

This is puzzling when groundwater extraction has decreased. Please include information that the Seascope well data is coming from the three monitoring wells drilled by Luhdorff & Scalmanini in the 1980's for the purpose of locating the depths of the salt water/ fresh water wedge in the Soquel Creek Water District pumping area.

**4) "Basin-wide change in storage is relatively stable,"** (page 13, ES-4)

This is also good news and begs the question as to the need for PureWater Soquel Project to inject treated sewage water into the high-quality Purisima Aquifer. Is this data reflective of the ASR pilot work the City of Santa Cruz has conducted? Please explain.

**5) PureWaterSoquel (PWS) is currently being constructed to produce and directly recharge the Purisima A and BC aquifer units with up to 1,500 acre-feet per year (AFY) of purified water. PWS project start up is expected in 2025.**

Why is PWS injecting into the Purisima A and BC units in Aptos when the data shows the chloride levels are increasing in the Purisima F unit in Seascope? Is the City of Santa Cruz ASR injection of potable water in the A and BC aquifer unit as well? If so, the PWS should NOT inject treated sewage water into the high-quality Purisma groundwater. The Central Coast

**6) "Santa Cruz Water Dept. is evaluating an Aquifer Storage Recovery (ASR) project as part of its effort to develop additional water supplies for use during extended drought periods while contributing to improved conditions in the Basin. The project will divert available flows from the San Lorenzo River, beyond what is needed to meet system demands, and inject and store the treated potable water in the aquifer through conversion of existing and installation of new municipal wells. Permitting of the initial well conversion is expected to be completed in 2026"** (pgs. 13-14, ES-3-4)

Please provide information regarding the depth of the wells and which units the potable water would charge. This is encouraging.

I applaud the City of Santa Cruz for doing this work and request the results of the ASR analysis be made publicly available.

**7) "Based on the information evaluated and presented in this Periodic Evaluation, the Groundwater Sustainability Plan (GSP) is still a viable Plan for achieving sustainability. Since the GSP does not need to be changed, a Plan Amendment is not necessary. The MGA will continue to implement the GSP as adopted by the MGA with the understanding that there is potential for some elements of the Plan to require an update in the future based on additional analysis of increasing chloride in the Seascope area and results from the Optimization Study."**

Why has the Optimization Study not yet been released publicly? Please provide a link in the Periodic Evaluation Report.

Based on stable groundwater storage levels and decreasing chloride levels, with the exception of the Seascope data, I feel the PureWater Soquel Project effluent should be restricted to irrigation use. Sadly, Permit Order R3-2023-0033 excluded irrigation use of the PWS water, therefore the District's gift of 3AF/Y FREE water to Twin Lakes Baptist Church will increase potable water extraction in the area to support the Church's new and expanded athletic field in order to uphold the terms of the Agreement.

**8) "The second challenge is with the continued increase in dissolved chloride, which is a possible indicator of active seawater intrusion, in the eastern part of the Basin. While the Basin has taken actions to reduce groundwater extraction in the area, the increase appears to be continuing. Assistance with specific studies related to characterizing and managing the issue would be most appreciated. For example, more refined electromagnetic surveys intended to characterize the extent of intrusion would be helpful."** (pages 149-150, 10.1- 10.2)

Please conduct an AEM study following the identical flight paths of the 2017 AEM study in order to assess the status of the basin before the PWS project begins injection. This would provide a clear picture of the current groundwater status and whether the Project is effective.

The map on page 21 comparing the flight paths of the DWR AEM flight paths is curious and yielded no information. **“Because the 2017 and 2022 flight lines were not flown over the exact same locations, comparison of changes over time are difficult to interpret.”** (page 23, 2-5)

Therefore, I request the MGA to fund a new AEM analysis with flight paths identical to the 2017 study, and to do so before the PWS project comes online.

Sincerely,  
Becky Steinbruner  
3441 Redwood Drive  
Aptos CA 95003  
[ki6tkb@yahoo.com](mailto:ki6tkb@yahoo.com)  
831-685-2915

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**Santa Cruz Mid-County Groundwater Agency** <[admin@midcountygroundwater.org](mailto:admin@midcountygroundwater.org)>  
To: Tim Carson <[tcarson@cfsc.org](mailto:tcarson@cfsc.org)>, Rob Swartz <[rswartz@cfsc.org](mailto:rswartz@cfsc.org)>

Thu, Sep 19, 2024 at 2:35 PM

And here are the official comments from Becky.

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**Santa Cruz Mid-County Groundwater Agency** <[admin@midcountygroundwater.org](mailto:admin@midcountygroundwater.org)>

Thu, Sep 19, 2024 at 2:44 PM

To: Becky Steinbruner <[ki6tkb@yahoo.com](mailto:ki6tkb@yahoo.com)>

Ms. Steinbruner,

This email confirms receipt of your comment submitted via email with regards to the Santa Cruz Mid-County Groundwater Agency's Draft Periodic Evaluation. Thank you for your interest in groundwater management in the Santa Cruz Mid-County Groundwater Basin.

Best regards,

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*Administrative Services*  
Santa Cruz Mid-County Groundwater Agency  
[admin@midcountygroundwater.org](mailto:admin@midcountygroundwater.org)

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Tim Carson &lt;admin@midcountygroundwater.org&gt;

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## California Department of Fish & Wildlife (CDFW) Comments on Draft Periodic Evaluation

3 messages

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**Maxfield, Jessica(Jessie)@Wildlife** <Jessica.Maxfield@wildlife.ca.gov>

Thu, Sep 19, 2024 at 7:32 PM

To: "comment@midcountygroundwater.org" &lt;comment@midcountygroundwater.org&gt;

Dear Members of the Santa Cruz Mid-County Groundwater Agency,

As some members of the MGA are aware, a Sonoma County judge recently ruled that Sonoma County violated state environmental law in its latest attempt to draft a revised Well Permitting Ordinance. Given this recent development, DFW would like to take this opportunity to remind the Santa Cruz Mid-County Groundwater Agency of public trust resource considerations related to groundwater management. CDFW and other resource agencies have repeatedly commented to GSAs across the state that groundwater pumping is depleting instream flow which is negatively impacting aquatic wildlife and that more needs to be done by groundwater managers to protect fish and wildlife resources that belong to the public.

In the context of SGMA statutes and regulations, and Public Trust Doctrine considerations, groundwater planning should carefully consider and protect environmental beneficial uses and users of groundwater, including fish and wildlife and their habitats, GDEs, and ISW. The Public Trust Doctrine imposes a related but distinct obligation to consider how groundwater management affects public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to surface waters is also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses. (*Environmental Law Foundation v. State Water Resources Control Board* (2018), 26 Cal. App. 5th 844; *National Audubon Society v. Superior Court* (1983), 33 Cal. 3d 419). The GSA has "an affirmative duty to take the public trust into account in the planning and allocation of water resources, and to protect public trust uses whenever feasible." (*National Audubon Society, supra*, 33 Cal. 3d at 446). Accordingly, groundwater plans should consider potential impacts to and appropriate protections for ISW and their tributaries, and ISW that support fisheries, including the level of groundwater contribution to those waters.

CDFW looks forward to continued communication and coordination with the Santa Cruz Mid-County Groundwater Agency as the GSP implementation progresses and the GSP is updated over time. Thank you for the opportunity to comment.

Sincerely,

Jessie Maxfield

**Jessie Maxfield**

Water Rights Coordinator/SGMA Coordinator

California Department of Fish and Wildlife

Bay Delta Region

2825 Cordelia Road, Suite 100

Fairfield, CA 94534

Office/Cel. 707-210-2807



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**Santa Cruz Mid-County Groundwater Agency** <admin@midcountygroundwater.org>

Fri, Sep 20, 2024 at 10:38 AM

To: Rob Swartz <rswartz@cfsc.org>

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**Santa Cruz Mid-County Groundwater Agency** <admin@midcountygroundwater.org>

Fri, Sep 20, 2024 at 10:57

AM

To: Jessica.Maxfield@wildlife.ca.gov

Ms. Maxfield,

This email confirms receipt of your Agency's comment submitted via email with regards to the Santa Cruz Mid-County Groundwater Agency's Draft Periodic Evaluation. Thank you for your interest in groundwater management in the Santa Cruz Mid-County Groundwater Basin.

Best regards,

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*Administrative Services*

*Santa Cruz Mid-County Groundwater Agency*

[admin@midcountygroundwater.org](mailto:admin@midcountygroundwater.org)

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