

From: Colin Gallagher [<mailto:colingallagher.rpcv@gmail.com>]
Sent: Tuesday, December 13, 2016 1:35 PM
To: Barbara Montanti <bmontanti@mcwd.org>
Subject: Fwd: December 12, 2016 - Corrected Agenda

Please direct a copy of this correspondence to each of the members of the MCWD Board of Directors.

It was submitted on Dec. 10, 2016 as a comment on the Marina City Council's Dec. 12, 2016 item 5(c) relating to MCWD formation of groundwater sustainability agency (GSA), but although it was for the Council, I nonetheless want to make sure that the MCWD Board members have a copy of this as well.

Respectfully,

Colin Gallagher
167 Pebble Place
Marina CA 93933

----- Forwarded message -----

From: Colin Gallagher <colingallagher.rpcv@gmail.com>
Date: Sat, Dec 10, 2016 at 3:49 PM
Subject: Re: December 12, 2016 - Corrected Agenda
To: Anita Sheperd-Sharp <AShepherd@ci.marina.ca.us>
Cc: City Council <CityCouncil@ci.marina.ca.us>, Executive Group <ExecutiveGroup@ci.marina.ca.us>, City Attorney <attys@wellingtonlaw.com>, Darlena Ridler <Ridler_garth@msn.com>, Demetrius Flewellen <jazzsaxd@gmail.com>, Donald Lebel <Donlebel52@yahoo.com>, Jim Perrine <jimperrine@live.com>, Mike Owen <Moo.owen58@gmail.com>, Mark.Nordberg@water.ca.gov

Please forward this following comment to City Council members. This is a comment on 5(c) relating to MCWD formation of groundwater sustainability agency.

(Comment by Colin Gallagher, resident of City of Marina, previous Planning Commissioner of City of Marina, 167 Pebble Place, Marina CA 93933, dated Dec 10, 2016)

In this State, the Sustainable Groundwater Management Act established a new structure for managing California's groundwater resources at a local level by local agencies. SGMA requires, **by June 30, 2017**, the formation of **locally-controlled groundwater sustainability agencies** (GSAs) in the State's high- and medium-priority groundwater basins and subbasins (basins). **A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield**, without causing undesirable results.

It should go without saying, but I'll say it anyway because it is something that people have been ignoring for some time here: The basin upon which Marina has been relying for its water cannot

be relied upon for the long haul, given the condition of the underground resource and the nature of our long-term drought, and the increasing demand in this area for housing and thus water, based on what we know of current population growth in the area. **Even if there were no growth at all (which would be impossible), all, and not just part of Marina will ultimately need to have its water supply supplemented by a desalination plant.** MCWD therefore needs to plan for this eventuality as part of the formation of the groundwater sustainability agency.

The [GSP Emergency Regulations](#) for evaluating GSPs, the implementation of GSPs, and coordination agreements were adopted by DWR and approved by the California Water Commission on May 18, 2016.

A GSP may be any of the following (*Water Code § 10727(b)*):

- A single plan covering the entire basin developed and implemented by one GSA.
- A single plan covering the entire basin developed and implemented by multiple GSAs.
- Subject to Water Code Section 10727.6, multiple plans implemented by multiple GSAs and coordinated pursuant to a single coordination agreement that covers the entire basin.

In the nearby area, the Salinas Valley GSA is shown (basically covering all of Marina) and also [a notice of election for a proposed MCWD GSA is shown for another area](#). This proposes that the MCWD become the exclusive groundwater sustainability agency for the Ord area of the Corral de Tierra sub-basin. It may be in the best interest of all concerned for the MCWD to become the exclusive GSA for that area corresponding to those served in Marina, inclusive of the Ord area, but it also strikes me that in the process of formation of the GSA that since **a GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, the real question issue to consider is whether the current arrangement and proposed uses of water are sustainable. I think that they are not and the formation of the GSA must take into account how all of Marina could be provided with supplemental water from a desalination plant to address the problem of declining availability of existing underground water sources for Marina.**

Respectfully,

Colin Gallagher