

SANTA YNEZ RIVER VALLEY BASIN GSAS

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**RE: SANTA YNEZ RIVER VALLEY GROUNDWATER SUSTAINABILITY PLANS,
GROUNDWATER BASIN NO. 3-015 – ACTION PLAN**

Dear GSP Review Section Managers Salais and Edmunds:

This letter is provided as a further response to comments on behalf of the Groundwater Sustainability Agencies (“GSAs”), the Western Management Area (“WMA”), Central Management Area (“CMA”) and Eastern Management Area (“EMA”) GSAs, which collectively cover Basin No. 3-015 (“Basin”) and are responsible for providing sustainable groundwater management of the Basin as required by the Sustainable Groundwater Management Act (“SGMA”).

As background, State Water Resources Control Board (“State Board”) staff provided comments dated April 14, 2023, to the California Department of Water Resources (“DWR”) on the three Santa Ynez River Valley Groundwater Sustainability Plans (“GSPs”) for the Basin concerning the GSPs’ characterization of subsurface water within the Santa Ynez River Alluvium above the Lompoc Narrows (“Santa Ynez Alluvium Area”) as river underflow and not “groundwater” as defined by SGMA. The three GSAs that prepared the GSPs then provided DWR with a joint letter, dated August 11, 2023, addressing the State Board staff comments.

Representatives from DWR, the State Board, and the GSAs then met to discuss the comments and response to comments. As a result of those meetings the GSAs developed the enclosed “Action Plan for Management of All Well Production Along the Santa Ynez River, Above the Lompoc Narrows” (“Action Plan”), which includes various actions intended to, among other

things, achieve the goal of educating, gaining additional information, and ensuring that all well production and well owners in the Santa Ynez Alluvium Area are registered and reporting to the applicable GSA, State Board, and the Santa Ynez River Water Conservation District. Based on DWR's recommendation, the GSAs have approved and authorized submission of the Action Plan as a further response to comments that addresses the State Board's concerns.

The GSAs remain committed to ongoing coordination with DWR and the State Board to ensure that surface and groundwater system interactions along the lower Santa Ynez River are fully addressed and managed by the GSAs in accordance with SGMA and other applicable authorities, and wish to thank DWR and the State Board for their assistance with this matter.

Very truly yours,

Bill Buelow, SGMA Point of Contract
For the WMA, CMA, and EMA GSAs

Enclosure

Action Plan for Management of All Well Production Along the Lower Santa Ynez River, Above the Lompoc Narrows

In the Santa Ynez River Valley Groundwater Basin (Basin), the Groundwater Sustainability Plans (GSPs) for the Western Management Area (WMA), Central Management Area (CMA) and Eastern Management Area (EMA) each characterize a portion of the lower Santa Ynez River and its underflow – extending from Bradbury Dam to the Lompoc Narrows – as a “surface water” system that exists in parallel with the “groundwater” system of the Basin. In accordance with the Sustainable Groundwater Management Act (SGMA), the GSPs characterize and demarcate the surface water system based on best available science and data.

The Groundwater Sustainability Agencies (GSAs) for the WMA, CMA, and EMA are committed to ensuring that all well production in the Basin is accounted for, quantified, reported to the appropriate regulatory agency or agencies, and managed in a sustainable and responsible manner. As a corollary, the GSAs are committed to the goal of ensuring that all well production and well owners in the Santa Ynez River Alluvium Area are registered and reporting to the applicable GSA, or to the State Water Resources Control Board (State Board), and the Santa Ynez River Water Conservation District (SYRWCD).

The following Action Plan provides the foundation of a programmatic approach to achieve these objectives.

1. The GSAs will prepare and publish for public review a detailed illustration of the surface water system that is demarcated in each of the GSPs for the WMA, CMA, and EMA (referred to as the “Above Narrows Alluvium Area”).
2. The GSAs will identify all existing wells located within the Above Narrows Alluvium Area.
3. The GSAs will specifically identify all wells in the Above Narrows Alluvium Area that are currently registered and reporting to the SYRWCD. (See, e.g., SYRWCD 45th Annual Report, Section 2.4 [reflecting 242 Active Wells and 68 Inactive Wells in Zone A].)
4. The GSAs will specifically identify all wells in the Above Narrows Alluvium Area that are currently registered and reporting to the SYRWCD, and those that also are claiming surface water production to the State Board, as reflected in the State Board’s Electronic Water Rights Information Management System (eWRIMS) database.
5. The GSAs will arrange educational workshops (at least two per year for the next two years) to educate all well owners and producers in the Above Narrows Alluvium Area with the goal of ensuring that all such diversions are properly reported to the applicable GSA, or to the State Board and SYRWCD.

The GSAs will:

- Mail notices regarding the workshops to all well owners and producers in the Above Narrows Alluvium Area that report to the SYRWCD.
 - Post and publish notice of the workshops at locations throughout the boundaries of the GSAs.
 - Explain the importance of monthly and annual measuring and reporting for each subsurface diversion, including upcoming well registration and reporting programs under SGMA, and filing of Statements of Water Diversion and Use with the State Board.
 - Provide information and direction on how to prepare and file Statements of Water Diversion and Use.
 - Explain the consequences of not reporting subsurface diversions, including potential management and/or investigation by a GSA, the State Board, or the SYRWCD, potential penalties, and enforcement actions.
6. Annual Reports by the GSAs will include an update on these educational workshops and other outreach to well owners and producers in the Above Narrows Alluvium Area, along with a summary of information obtained through the ongoing Action Plan process.
 7. At the Periodic Evaluation, the GSPs will be revised, as appropriate, in light of new information developed and new well registration and reporting programs in place based on actions by the GSAs under the ongoing Action Plan process.
 8. In conjunction with actions by the GSAs, the SYRWCD will continue its robust programs for the Above Narrows Alluvium Area, including well registration, well production reporting and production charges, and coordination of releases from the Cachuma Project for underflow alluvial storage and replenishment per applicable State Board Orders.
 9. The GSAs will further analyze the Airborne Electromagnetic (AEM) surveys conducted throughout the Basin and incorporate them into the Periodic Evaluations of the GSPs.
 10. The GSAs will further analyze and define the interconnection of surface and groundwater systems as described in the GSPs.
 11. The GSAs remain committed to ongoing coordination with DWR and the State Board to ensure that surface and groundwater system interactions along the lower Santa Ynez River are fully addressed and managed by the GSAs in accordance with SGMA and other applicable authorities.