

January 12, 2022

VIA EMAIL info@sgma.pleasantvalleywaterdistrict.com

Pleasant Valley GSA
PO Box 468,
Coalinga, CA 93210

Re: City of Coalinga Comments

The City of Coalinga has reviewed the Pleasant Valley Groundwater Sustainability Plan ("GSP") and appreciates the opportunity to review and comment on the GSP pursuant to the Sustainable Groundwater Management Act ("SGMA").

As a GSA serving in an advisory role to the Pleasant Valley Sub-Basin the City of Coalinga wanted to provide its comments on the final draft GSP which have been divided into general/administrative/policy comments and more detailed technical comments.

General/Administrative/Policy Comments

Groundwater recharge by the City of Coalinga via wastewater treatment plant

The City of Coalinga wants to ensure the groundwater being recharged out of the City of Coalinga's wastewater treatment plant is correctly accounted for which was subject to discussion during the technical meetings. The City of Coalinga estimates 1 million gallons a day are recharged into the basin via the wastewater treatment plant. The City found the recharge rates within the GSP to be vague with a range of 200-3000 acre feet time range. (Page 251-252). Also, the City found the recharge from the Prison and Hospital to be missing as these facilities are located in the City limits. Finally, the GSP was vague as to which entity would receive the groundwater credit for the wastewater treatment plant recharge when the City of Coalinga physically recharges the water. The GSP should clearly present the future projected water recharge from the City of Coalinga, State Hospital, and State Prison's wastewater treatment plants. Finally, the GSP should note that any groundwater recharged via the wastewater treatment plants are credited to the City of Coalinga GSA.

Technical Comments

- Number of hospitals and prisons is not correct. There are not "two nearby prisons and a hospital" (page 11). There is a prison and a state hospital both of which are located within the City of Coalinga. If you are referring to the Coalinga Regional Medical Center as the second hospital please clarify.
- The City of Coalinga's wastewater treatment plant is incorrectly labeled as a "lake" in the GSP. (Page 85). The City of Coalinga's wastewater treatment plant should be corrected and relabeled as a wastewater treatment plant.

- Produced water from the oil industry should not be considered under SGMA because this water is extracted from below the groundwater aquifer and produced water does not come from formations yielding usable groundwater. (Page 109). Second, treated produced water that is extracted and recharged should be accounted for and this data should be provided by the oil companies.
- The City of Coalinga has accurate surface water information both from the Coalinga Canal and out of the surface water treatment plant. The City is willing to share this information. However, the City of Coalinga is requesting the surface water values related to streams flowing through the GSA. (Page 13). Also, the City of Coalinga is requesting this data be integrated within the GSP. Also, the GSP should clarify and distinguish naturally occurring surface water versus imported surface water and the return flow of this imported water.
- The City of Coalinga adopted an Urban Water Management Plan. (Page 107). Within the adopted Plan is a drought contingency plan which is intended to assist the City of Coalinga prepare and manage for a drought.
- The City of Coalinga is not responsible for any of the potential groundwater projects unless the City expressly agrees to join and pay for a project. The City of Coalinga agrees that project costs should be the responsibility of the proponent.
- There are some general concerns about the accuracy of the Land IQ land mapping program. The City of Coalinga wants to ensure Land IQ is in fact accurate and reliable. For example, certain land uses like “truck crops” are not defined and not correctly labeled within the City of Coalinga. Also, there appears to be a higher number of deciduous crop acreage than what is actually grown in the city limits of Coalinga.

We appreciate the opportunity to provide our general and technical comments related to the Pleasant Valley Groundwater Sustainability Plan. We hope these comments are welcomed and addressed at the public meeting and integrated into the Final Plan.

Please do not hesitate to contact me if you have any questions at sbrewer@coalinga.com or 559-935-1533.143.



Sean Brewer, Assistant City Manager

Cc: Sebastian Silveira, Griswold-Lasalle
 Marissa Trejo, City Manager
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