

Proposed Motions (#1-6) in **Bold**:

LarryR #1. The LRE/Water Review states the following Recommendation 1:

Complete a more detailed sensitivity analyses (sic) on the following:

- a. Scale of hydraulic conductivity in model layers 1 and 3 (low permeability layers); and
- b. Horizontal / vertical hydraulic conductivity ratio (kh/kv) in all layers.

Proposed Motion #1 –

Accordingly, it is necessary and desirable that the Monolith Application submit a more detailed sensitivity analysis as recommended in LRE/Water Review Recommendation 1.

LarryR #2. LRE/Water states the following Conclusion 7:

It is our opinion that the physical structure of the CPA aquifer within the model extent is reasonably adequate for model simulations to achieve the desired objectives if the assumption of little to no interaction with bedrock aquifers can be strengthened. If the recommended gradient analysis shows the likelihood of a gradient reversal from downward to upward, further analysis or monitoring is recommended.

LRE/Water Recommendation 4. states:

Better characterize the gradient (i.e. flow direction) between the bedrock units and the CPA aquifer in the area if bedrock well water level measurements exist.

Proposed Motion #2 –

Accordingly, it is necessary and desirable that the Monolith Application include (1) further gradient analysis of interaction of the CPA aquifer in the area with bedrock aquifers to support its assumption of little or no interaction with bedrock aquifers, (2) the likelihood of gradient reversal to upward flow direction if the further analysis shows downward gradient or little to no interaction. If bedrock well water level measurements do not exist, then identify the basis for any assumption that the gradient is downward or that there is little to no interaction of the CPA aquifer in the area with bedrock aquifers.

LarryR #3. LRE/Water states the following Recommendation 5:

LRE recommends that a groundwater monitoring plan be developed and implemented before the Monolith Well begins operating.

Proposed Motion #3 –

Accordingly, it is necessary and desirable that the Monolith Application include details of any groundwater monitoring plan Monolith intends to develop and implement to address future potential changes in groundwater quality and quantity at the Site and surrounding area. Further, that such details are responsive to changes in groundwater quality (as observed in points 1) – 3) of the recommendation.

LarryR #4. LRE/Water states the following Recommendation 6:

Identify and document details (i.e., owner, location, depth, pump setting, static water levels) on all private and public supply wells within 1 ½ miles of the Site, and provide a well interference contingency plan in the event that any issues should occur to these wells as a result of the Monolith Well pumping.

Proposed Motion #4 –

Accordingly, it is necessary and desirable that the Monolith Application include details of wells and a well interference plan as provided in Recommendation 6.

LarryR #5. The Monolith Hydrologic Analysis Report notes in various places the use of historical climate data over the past years as part of determining estimates of groundwater recharge and groundwater withdrawals. Ruth. Examples would be development of the LPMT Model and the creation of a 50-year future scenario using the LPMT (a regional model first mentioned at ES-1), the Monolith groundwater model (a subregional model first mentioned at ES-2), and perhaps various other models mentioned on page 11. Future climate may be relevant to potential short or long-term effect to the CPA aquifer by Monolith drawdown under the permit. Additionally, future climate may be relevant to the drawdown effect on a nearby well with a higher preference of use.

Proposed Motion #5-

Accordingly, it is necessary and desirable that Monolith provide additional information on (1) the use of future climate in the Monolith Hydrogeologic Analysis, and (2) the general effect of future climate on the CPA aquifer and on the drawdown effect on a nearby well with a higher preference of use over the 50-year period of its future scenario. Specifically, that such additional information include the impact of global climate change on future rainfall consistent with the analysis used by Olsson in the Salt Creek Floodplain Resiliency Study as reported in Section 5 of the Study Report of August 15, 2020.

LarryR #6. The Monolith Hydrologic Analysis Report states that “it is generally understood that significant aquifer drawdowns resulting from a newly proposed water use could be detrimental to the aquifer as this could impact...the total dissolved solids (TDS) within the Groundwater Reservoir due to upwelling of underlying water with higher TDS.” (p. 53). The Monolith Report also states: “While declines of up to 8.5 feet can be anticipated in the immediate vicinity of the Monolith well, impacts of this extent will be localized and are generally less than 1-2 feet over most of the aquifer.” (p. 57)

Proposed Motion #6-

Accordingly, it is necessary and desirable that Monolith provide additional information on the potential for upwelling in the immediate vicinity (as that term is used on p. 57) of the Monolith well over the 50-year period of its future scenario.