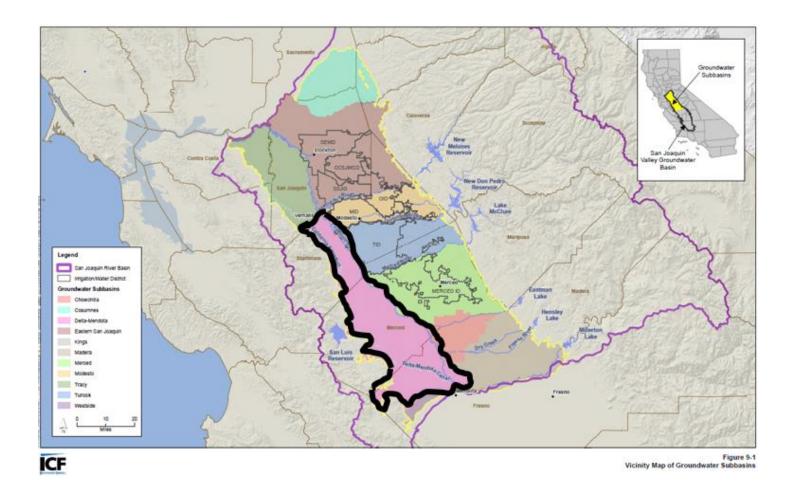


Delta Mendota Subbasin Groundwater Management

Sustainable Groundwater Management Act Communications Plan



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MWH. and Stantec

June 2017

Forward: How to use this Plan

This Communication Plan provides a high-level overview of near and long-term outreach and engagement strategies, tactics and tools. Its purpose is to assist the Groundwater Sustainability Agencies (GSAs) of the Delta Mendota Subbasin with stakeholder outreach and other related actions as required by the Sustainable Groundwater Management Act (SGMA) of 2014. It is presented as a working public draft, and should be considered a living document that is continuously refined and updated as circumstances suggest.

Chapter 1: Introduction and Background provides text and information about SGMA and the Delta Mendota Subbasin that can be repurposed directly into websites or printed materials by agencies and/or entities with an interest in SGMA and how it will affect the subbasin. This section also describes the communications activities mandated by SGMA.

Chapter 2: *Communications Plan Overview* provides communications planning goals and objectives as well as the scope. This section can be used in support of project management activities.

Chapter 3: *Situation Assessment* provides some of the context for communications activities. This section can be used in developing required assessments of stakeholder issues and interests. It also informs project management activities.

Chapter 4: Audiences and Messages identifies key subbasin audiences and message points for specific audience segments. The goal of this chapter is to provide information that can be used by the subbasin GSAs in preparing to work with key stakeholders.

Chapter 5: *Risk Management* is the summary of a communications risk assessment that considers subbasin communications strengths and weakness and proposes on-going adjustments based on best communication management practices. This section informs project management activities and provides a context for some of the recommended communications tactics.

Chapter 6: *Tactical Approaches* offers a communications to do list with specific communications activities relevant for project phases and subbasin audiences.

Chapter 7: *Measurements and Evaluation* outlines methods to determine the effectiveness of outreach and engagement.

Chapter 8: *Roles and Responsibilities* provides a sample list of tasks and illustrates the types of communications roles and responsibilities which might be assigned. This section should be incorporated into project management plans.

Subbasin GSAs should feel free to repurpose any or all parts of the document that will assist them in meeting SGMA requirements.

This document was developed with technical support provided by the California Department of Water Resources' (DWR) SGMA Facilitation Support Services Program and completed by the Communication and Engagement Group of MWH/Stantec.

Delta Mendota Subbasin Sustainable Groundwater Management Act Communications Plan Working Draft

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List of Acronyms and Abbreviations

Item	Description		
Basin	Groundwater Basin or Subbasin		
Coms Plan	Delta Mendota Subbasin, Sustainable Groundwater Management Act, Working Draft		
	Communications Plan		
CSD	Community Service District(s):		
CV-SALTS	Central Valley Salinity Alternatives for Long-Term Sustainability		
DAC	Disadvantaged Communities		
DMC	Delta-Mendota Canal		
DWR	California Department of Water Resources		
GSA	Groundwater Sustainability Agency		
GSP	Groundwater Sustainability Plan		
IRWMP	Integrated Resource Water Management Plan		
PDF	Portable Document Format		
RCD	Resource Conservation District(s)		
SGMA	Sustainable Groundwater Management Act		
SLDMWA	San Luis Delta- Mendota Water Authority		
State Board	State Water Resources Control Board		

ltem	Description	
SA	Situation Assessment	
USGS	United States Geological Survey	

Revision History

Table 1. Revision History

Revision History					
Revision/Dock Title #	Date of Release	Author	Summary of Changes		

INTRODUCTION AND BACKGROUND

The purpose of this Communication Plan is to assist the Groundwater Sustainability Agencies (GSAs) of the Delta Mendota Subbasin with stakeholder outreach and other related actions as required by the Sustainable Groundwater Management Act (SGMA) of 2014. Its chapters identify key stakeholders and provide a high-level overview of near and long-term outreach and engagement strategies, tactics and tools. The plan was developed with technical support provided by the California Department of Water Resources' (DWR) SGMA Facilitation Support Services Program.

1.1. SGMA Basics¹

After decades of debate, in 2014 California lawmakers adopted SGMA. This far-reaching law seeks to bring the State's critically important groundwater basins into a sustainable regime of pumping and recharge. The change in water management laws has created new obligations for residents and water managers in the Delta-Mendota Groundwater Subbasin. The San Luis Delta- Mendota Water Authority (SLDMWA) is assisting its members in implementation of this law.



SGMA requires, **by June 30, 2017**, the formation of locallycontrolled GSAs in many of the State's groundwater basins and subbasins (basins). A GSA is responsible for developing and implementing a **groundwater sustainability plan** (GSP). These plans assist the basins in meeting sustainability goals. The primary goal is to maintain sustainable yields without causing undesirable results.

1.1.1. <u>GSAs & GSPs</u>

Any local public agency that has water supply, water management, or land use responsibilities in a basin can decide to become a GSA. A single local agency can decide to become a GSA, or a combination of local agencies can decide

to form a GSA by using either a Joint Power Authority (JPA), a memorandum of agreement (MOA), or other legal agreement. If no agency assumes this role the GSA responsibility defaults to the County; however, the County may decline.

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 <u>single plan</u> covering the entire basin developed and implemented by <u>multiple</u> <u>GSAs</u>.

¹ Sections on SGMA are largely drawn, in whole or in part, from publicly available materials from the Department of Water Resources. For more see: <u>http://www.water.ca.gov/groundwater/sgm</u>

• Subject to Water Code Section 10727.6, <u>multiple plans</u> implemented by <u>multiple</u> <u>GSAs</u> and coordinated pursuant to a <u>single coordination agreement</u> that covers the entire basin.

If local agencies are unable to form an approved GSA and/or prepare an approved GSP in the required timeframe, then the basin or subbasin would be considered unmanaged. Unmanaged groundwater basins and subbasins are subject to State Water Resources Control Board (State Board) oversight. This is true even if the vast majority of the subbasin is covered by a plan. Should intervention occur, the State Board is authorized to recover its costs from the GSAs.

1.2. SGMA Communications and Engagement Requirements

SGMA includes specific requirements for communications and engagement by each planning phase. **Figure 1** (next page) illustrates the requirements and provides water code references. The GSP submittal guidelines also describe the outreach and engagement documentation to be submitted with the plan. **Table 2** describes the submittal requirements. A full list of codes and requirements is also provided in **Appendix 1**.

GSP Regulations Requirement Section		Description	
Article 5. Plan Cont	ents, Sub-article 1. A	Administrative Information	
354.10	Notice and Communication	 Description of beneficial uses and users List of public meetings with dates GSP comments and responses Decision-making process Public engagement process Method(s) to encouraging active involvement Steps to inform the public on GSP 	
		implementation progress	

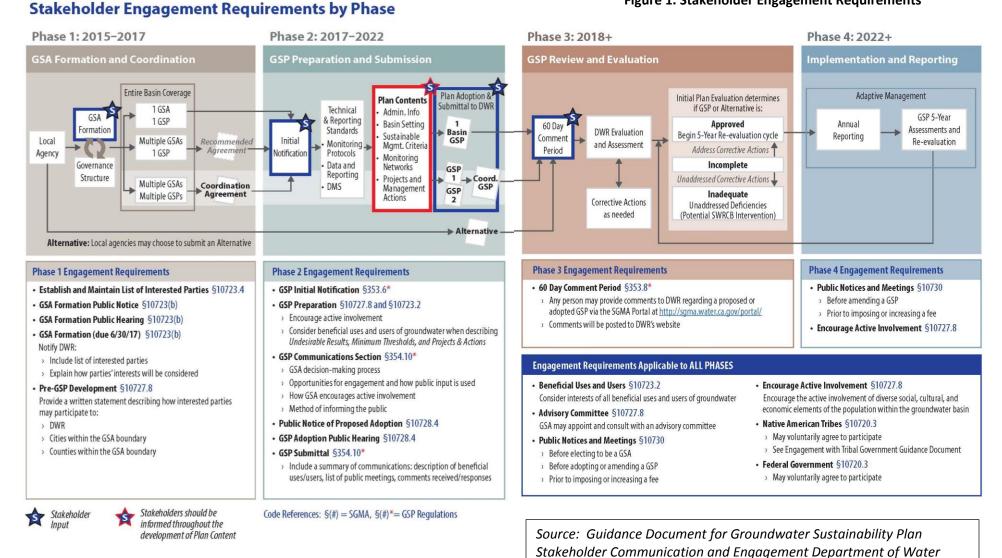
Table 2.	GSP	Submittal	Requirements ²
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1.3. Planning Approach

While the SLDMWA is assisting with the coordination of GSP(s) development, this Communications Plan (Coms Plan) is offered for the voluntary use of all of the GSAs of the Delta-Mendota Subbasin. A full Coms Plan schedule should be developed in conjunction with the overall GSP(s) development schedule. One additional option is for the Coordination Committee of GSAs to provide overall communications guidance. This could potentially be included in a section of the Coordination Agreement.

² Guidance Document for the Sustainable Management of Groundwater, Preparation Checklist for GSP Submittal, Department of Water Resources, December 2016

Figure 1. Stakeholder Engagement Requirements



Resources, June 2017

An important additional step will be establishing, in conjunction with the multiple GSAs, the roles and responsibilities for implementing the Coms Plan.

1.4. SGMA and the Delta Mendota Subbasin³

The Delta-Mendota Subbasin of the San Joaquin Valley Groundwater Basin is a long, relatively narrow groundwater basin that covers portions of five counties, from north to south, San Joaquin, Stanislaus, Merced, Madera and Fresno Counties (see Figure 2). The Delta-Mendota sub-basin is bounded on the west by the Tertiary and older marine sediments of the Coast Ranges. The northern boundary (from west to east) begins on the west by following the Stanislaus/San Joaquin County line, then deviates to the north to encapsulate all of the Del Puerto Water District before returning back to the Stanislaus/San Joaquin County line. The boundary continues east then deviates north again to encapsulate all of the West Stanislaus Irrigation District before returning back to the Stanislaus/San Joaquin County line. The boundary continues to follow the Stanislaus/San Joaquin County line east until it intersects with the San Joaquin River.



Figure 2. Delta Mendota Subbasin

The eastern boundary (from north to south) follows the San Joaquin River to within Township 11S, where it jogs eastward along the northern boundary of Columbia Canal Company and then follows the eastern boundary of Columbia Canal company until intersecting the northern boundary of the Aliso Water District. The boundary then heads east following the northern and then eastern boundary of the Aliso Water District until intersecting the Madera/Fresno County line. The boundary then heads westerly following the Madera/Fresno County line to the eastern boundary of the Farmers Water District. The boundary then heads southerly along the eastern boundary of the Farmers Water District, and continues southerly along the section line to the intersection with the northern rightof-way of the railroad. The boundary then heads east along the northern right-of-way of the railroad until intersecting with the western boundary of the Mid-Valley Water District. The boundary then heads south along the western boundary of the Mid-Valley Water District to the intersection with the northern boundary of Reclamation District 1606. The boundary then heads west and then south following the boundary of Reclamation District 1606 and James Irrigation District until its intersection with the Westlands Water District boundary.

The southern boundary (from east to west) matches the northerly boundaries of Westlands Water District legal jurisdictional boundary last revised in 2006. The boundary then

³ Information related to the Delta Mendota subbasin is drawn directly from <u>http://sgma.water.ca.gov/basinmod/basinrequest/preview/23</u>.

proceeds west along the southernmost boundary of the San Luis Water District. The boundary then projects westward from this alignment until intersecting the Delta-Mendota sub-basin Western boundary described above.

1.5. Delta-Mendota Subbasin GSP Planning

The GSAs of the Delta-Mendota Subbasin intend to work together to meet Sustainable Groundwater Management Act (SGMA) requirements and prepare a Groundwater Sustainability Plan (GSP) or coordinated Sustainability Plans by June 31, 2020. The San Luis Delta- Mendota Water Authority (SLDMWA) is assisting its members and non-members in planning and implementation of this law and has been directly assisting a subset of the local GSA eligible agencies in organizing to accomplish required SGMA tasks. The SLDMWA has also hosted informal, information meetings with all of the subbasin GSAs.

While SLDMWA coordinated GSAs are confident in their ability to prepare a GSP for the areas under their jurisdiction, SGMA requires that an approved GSP or multiple coordinated GSPs are in place to provide sustainable management for the entire subbasin. The identified GSAs have been asked to determine how they wish to proceed in individual GSP development or a coordinated single GSP by July 2017 and whether or not they wish to participate in the Prop 1 Sustainable Groundwater Planning Grant as a joint request.

1.6. Delta Mendota Subbasin GSAs

Following are the DWR identified agencies (as of June 15, 2017).⁴

- 1. Aliso Water District
- 2. Central Delta-Mendota Region Multi-Agency GSA
- 3. City of Dos Palos
- 4. City of Firebaugh
- 5. City of Gustine
- 6. City of Los Baños
- 7. City of Mendota
- 8. City of Newman
- 9. City of Patterson
- 10. County of Madera-3
- 11. DM-II
- 12. Farmers Water District
- 13. Fresno County-Management Area 'A'
- 14. Fresno County-Management Area 'B'
- 15. Grasslands Groundwater Sustainability Agency
- 16. Merced County-Delta-Mendota

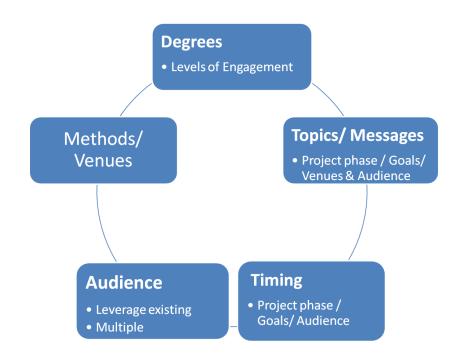
⁴ See: <u>http://sgma.water.ca.gov/portal/</u>

- 17. Northwestern Delta-Mendota GSA
- 18. Ora Loma Water District
- 19. Patterson Irrigation District
- 20. San Joaquin River Exchange Contractors Water Authority
- 21. Turner Island Water District-2
- 22. West Stanislaus Irrigation District GSA
- 23. Widren Water District GSA

COMMUNICATIONS PLAN OVERVIEW

Communication is the process of transmitting ideas and information. According to the Project Management Institute, 75%-90% of a project manager's time is spent communicating. A Coms Plan provides the purpose, method, messages, timing, intensity, and audience of the communication, then describes who will do the communicating, and the frequency of the communication (see **Figure 3**.)





2.1. Purpose

The purpose of the Delta-Mendota Subbasin, Sustainable Groundwater Management Act, Coms Plan is to outline the information and communications needs of the project stakeholders and provide a roadmap to meet them. The Coms Plan then identifies how communications activities, processes, and procedures will be managed throughout the project life cycle.

2.2. Importance

While communications are important in every project, a well-executed communications strategy will be essential to the success of the GSP(s) development and adoption process. The financial and regulatory stakes are high and communication missteps can create project risks. Further, development of a viable GSP(s) will require an on-going collaboration among all the stakeholders, both organizational and external. The plan will be comprehensive and consider multiple variables, a range of system elements and project costs and benefits. Stakeholder input will be needed to refine GSP requirements and fully

define the water management system, and potential impacts, costs and benefits that may result in managing for sustainability.

2.3. Scope

The plan focuses on formal communication elements. Other communication channels exist on informal levels and enhance those discussed within this plan. This plan is not intended to limit, but to enhance communication practices. Open, ongoing communication between stakeholders is critical to the success of the project.

2.4. Communications Goal

Development, adoption and implementation of the GSP(s) will require basin external stakeholders, other agencies, staff, managers, and the multiple GSA Boards to evaluate choices, make decisions and commit resources.

The core communications goal is to plan for and efficiently deliver clear and succinct information:

- At the right time
- To the right people
- With a resonating message

This is done to facilitate quality decision making and build accompanying public support

2.5. Communications Objectives

The Coms Plan Objectives are to present strategies and actions that are:

- Realistic and action-oriented
- Specific and measurable
- Minimal in number (a few well delivered are better than many mediocre efforts)
- Audience relevant

2.6. Strategic Approach

Three primary communications strategies have been identified for the GSP(s) development.

- 1) Fully leverage the activities of existing groups. This practical approach is cost effective and respectful of the limited time that stakeholders have to participate in collaborative processes.
- 2) Provide targeted, communications and outreach to opinion leaders in key stakeholder segments.
- Provide user friendly information and intermittent opportunities through existing communication channels and open houses or workshops to allow interested stakeholders (internal and external) to engage commensurate with their degree of interest.

2.7. Communications Governance, Communications Team

Given the relatively large number of stakeholders, a recommendation for coordinated efforts, and the legal requirements for outreach⁵, some form of communications governance is recommended. Several governance options for consideration are offered in Appendix 2. The actual form of the governance is less important than a clear understanding of the roles and responsibilities of those responsible for ensuring required communication. For the purpose of this document, an assumption is made that some form of governance will be identified and a communications team (which may be an individual or multiple individuals, and/or include the project consultants) is designated.

A driving consideration for this recommendation is the level of effort associated with required activities and the fact that communications are highly time dependent. That means that communications activities should be occurring that may happen outside of regularly scheduled GSA meetings. In this case delegation with guidance is efficient and effective.

2.8. Constraints

All projects are subject to limitations and constraints as they must be within scope and adhere to budget, scheduling, and resource requirements. These constraints can be even more challenging in projects with multiple agencies as will be the case with the development and coordination of multiple GSPs.

There are also legislative, regulatory, technology, and other organizational policy requirements which must be followed as part of communications management. These limitations must be clearly understood and communicated where appropriate. While communications management is arguably one of the most important aspects of project management, it must be done in an effective and strategic manner recognizing and balancing the multiple constraints.

All project communication activities should occur within the project's approved budget, schedule, and resource allocations. The GSP(s) project managers and the leadership of the participating GSAs should have identified roles in ensuring that communication activities are performed.

To the extent possible, to support collaboration and reduce costs, GSP(s) partners should utilize standardized formats and templates as well as project file management and collaboration tools.

⁵ See Appendix 1

SITUATION ASSESSMENT

3.1. Introduction

The challenges of asking a community to make changes in how things are done, or forging an agreement among multiple parties are often large. Prior to preparing a Coms Plan, a neutral, 3rd party facilitator conducted a stakeholder Situation Assessment (SA).

The facilitator's role was to provide an independent evaluation of potential stakeholder's interest in coordination and governance for GSA formation and GSP development and identify any barriers or concerns that would need to be addressed for the GSA formation process and GSP(s) development to be successful.

3.2. Situation Assessments

An SA is an information-gathering process that informs outreach, engagement and collaboration. As part of preparing the basin communication's process, it was important to know more about:

- Stakeholder Categories
- Opinion leaders
- Regulatory and political context
- Advocates and detractors
- Attitudes and knowledge
- Other elements useful to the crafting of decisions

An assessment is also a low risk approach to education and signaling a future relationship. It facilitates the community's appraisal of its needs, wants and values. A well-crafted assessment sets the stage for the parties to better understand and interpret their situation so that they can make informed decisions for actions, in the short term and for the future.

The Delta-Mendota subbasin SA included background research and interviews. Interviews were usually with individuals but in a few cases a very small group was convened. To encourage candor, the results of the input process were bundled so those interviewed were not individually identified unless they explicitly indicated they wished to share their individual response.

3.3. Background Research

The facilitator worked closely with the SLDMWA and DWR to identify useful documents, plans and activities that might inform the overall communications planning process.

3.4. Interviews and Consultations

Using information gathered during the background research and similar GSA formation efforts throughout the state, the facilitator worked with the SLDMWA to craft interview questions. The facilitator also provided some selection criteria to the SLDWMA to help identify a representative group of interview candidates. Once selected, the SLDMWA staff and facilitation team invited the interviewees to participate. In addition to full interviews,

additional calls and in person communications were conducted to acquire amplifying information. **Figure 4** provides a quick overview.

Figure 4. Interview and Consultation Quick Facts



Selected participants were all engaged or otherwise stakeholders in some aspect of the basin GSA development process.

A project background sheet was provided in advance of each formal interview and used again during the interviewee discussions with the facilitator. Each interview followed the same format and included 16-18 questions (depending on whether or not a follow-up question was needed).

The questions covered the following topics pertaining to the GSA formations and GSP(s) development:

- 1. Overarching perspectives from each key stakeholder on general groundwater conditions, GSA governance; subbasin management and associated SGMA compliance
- 2. Preferred methods to achieve groundwater sustainability consistent with SGMA requirements
- 3. The level of agreement/conflict around groundwater governance across the range of stakeholder perspectives
- 4. Experience with facilitated processes, outreach and engagement, and the goals for such support
- 5. Potential configurations of governance and formations of GSAs and GSP development

3.5. Summary of key findings

Interview results indicate an overall positive environment for the project and project communications; however, the effort will require interactions of a large number of parties and planning for an extremely complex system. Following are the reflections, ideas and suggestions of those contacted.

3.5.1. Related to Groundwater Sources and Trends

• Significant observed impacts associated with Weather, Water Project Deliveries and Cropping Patterns – Participants observed a declining groundwater situation and were able to attribute it to drought and weather (particularly timing of seasonal rainfall and periods of prolonged, higher temperatures), conversion to permanent crops, and significant changes in access to surface water.

- Surface & Groundwater Nexus As noted in comments related to access to surface water, there was a clear understanding of the surface/groundwater nexus. Many believed that any realistic solution would have to include a full assessment of the region's surface water future.
- Extremely Complex Systems Many of those interviewed reported that parts of the subbasin were doing fine and could, with good management, be sustainable. They described problems as being primarily in pockets of the subbasin. They also characterized some parts of the subbasin as not being managed sustainably and indicated that they believe this would have continued had SGMA not passed. While it was generally agreed that it would have been better if SGMA was not driving the change, they felt change would not occur without something like SGMA. Several of the participants were able to describe specific locations and situations that illustrated this.

Issues related to operations of the Bureau of Reclamation, the Delta-Mendota Canal (DMC), the Mendota Pool and restoration activities are of keen interest to all the stakeholders. Everyone was familiar with issues of subsidence and with the facts and figures represented in graphics like those in **Figure 5**, prepared by the United States Geological Survey (USGS).⁶

Many perceived that groundwater supplies for municipal uses in some parts of the basin were at risk.

 Historic Rights and Arrangements – Access to surface water is based on numerous historic rights and agreements as well as more contemporary agreements. As such there is no single description of the status of surface water availability among the many subbasin GSAs,⁷ although there is a strong understanding of the rights and arrangements that do exist.⁸

⁶ U.S. Department of the Interior | U.S. Geological Survey: <u>https://ca.water.usgs.gov/projects/central-valley/delta-mendota-canal.html</u>, Page Last Modified: Monday, 20-Mar-2017 22:39:47 EDT

⁷ A full inventory of water rights and arrangements for the subbasin GSAs is recommended to be prepared as part of the GSP planning process.

⁸ In 2010 there were 1,403 water rights claimed in the San Joaquin Delta watershed, the largest number of any watershed in the State. [Source: Associated Press: Original data source is State Water Resources Control Board eWRIMS, Database

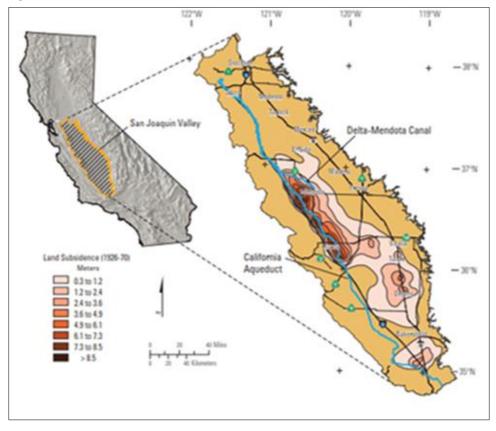


Figure 5. USGS Illustration of the DMC and Subsidence

The hierarchy of water rights as well as laws related to groundwater rights will be a significant factor in GSP negotiations.

Another historical factor related to sustainability is the character of land ownership. There was a perceived difference in the values placed on sustainability by multi-generational family farms versus investor driven agriculture and/or water development.

3.5.2. <u>Related to GSA Governance; Subbasin Management and SGMA</u> <u>Compliance</u>

 Numbers - The subbasin includes numerous Water Agencies (35) and other potential GSA eligible agencies including Cities and Counties (such as Dos Palos, Firebaugh, Gustine, Los Baños, Mendota, Newman, Patterson, Fresno, Madera, Merced, San Joaquin, and Stanislaus) and Community Service Districts (CSDs) including among others Grayson, Westley, and Volta, as well as multiple Resource Conservation Districts (RCDs) that for the most part were within the general boundaries of other GSA eligible authorities (Panoche, Poso and Grasslands as an example).

By the June 30, 2017 filing deadline, 23 eligible entities had formally filed GSA formations and met SGMA requirements for subbasin coverage.

Even with this large number of GSA entities, during the SA interviews and in a follow-up survey, most agencies indicated a preference for a reduced number of GSPs and potentially just one or two.

At the time of this assessment there was not a full understanding of all of the potential requirements of being a GSA and ultimately what might be required to prepare a compliant GSP.

ble 3. Number of Su	ubbasin Public Water Agen	cies				
Number of Public Water Agencies						
Merced County	Foothill WD	• Panoche WD				
Fresno CountyBroadview WD	Fresno Slough WDGrasslands WD	Patterson WDRomero WD				
 Centinella WD Central California ID, 	Hospital WDKern Canon WD	Salado WDSan Luis Canal Company				
 Davis WD Del Puerto WD 	Laguna WDMercy Springs WD	San Luis WDSanta Nella C.WD				
• Eagle Field WD	Mustang WDOak Flat WD	Sunflower WDTranquility ID				
El Solyo WDFarmers WD	Orestimba WDOro Loma WD	West Stanislaus IDWidren WD				
 Firebaugh Canal WD 	Pacheco WD	Quinto WD				

At the time of this assessment participants did not fully recognize the potential number of stakeholders and/or the requirements to conduct outreach.

Subbasin Governance Structures – Many individuals and entities within the ٠ subbasin have experience working in cooperative governance and related structures. For example, the SLDMWA provides leadership for an Integrated Resource Water Management Plan (IRWMP) illustrated in Figure 6⁹ on the following page. Many of the stakeholders are also involved with Irrigated Lands Coalitions (see Figure 7).¹⁰

Likewise, many are also involved in efforts related to the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative (see Figure 8).

⁹ Source : San Luis & Delta-Mendota Water Authority, Westside-San Joaquin Integrated Water Resources Plan, July 2014

¹⁰ Source: Central Valley Regional Water Resources Control Board

Existing Cooperative / Collaborative Governance Structures with Delta Mendota Subbasin Stakeholders

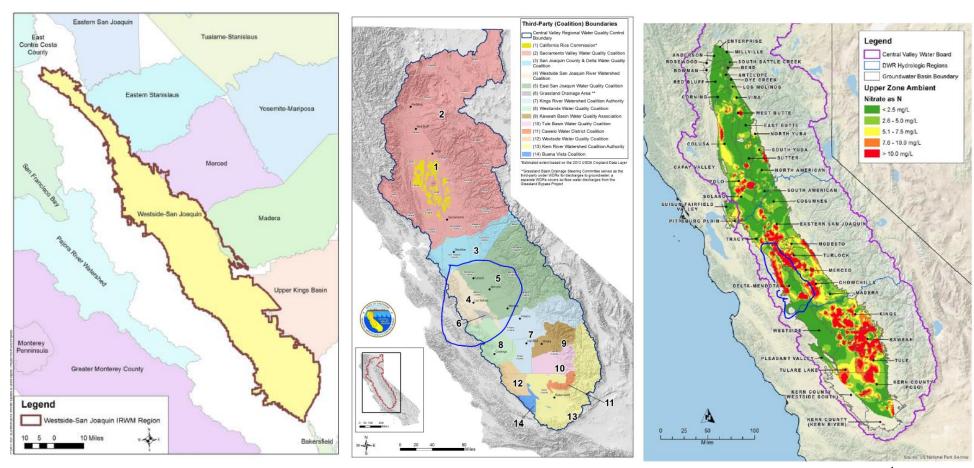


Figure 6. Integrated Regional Water Management Groups

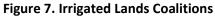


Figure 8. CV-Salts Initiative

CV-Salts was launched to develop sustainable salinity and nitrate management planning for the Central Valley. (See **Figure 8**.¹¹)

Finally, there are multiple arrangements in place related to surface water transfers and other previous groundwater management planning efforts.

Experience with these programs has created a capacity for collaborative planning that will be essential for GSP development. It also creates opportunities to access and leverage existing stakeholder meetings and events rather than needing to convene multiple new stakeholder processes.

3.5.3. Issues to be Addressed in Creating a Sustainability Plan

Some of the participants indicated they had an extremely good understanding of their section of the subbasin, with exact and extensive records to support their perspective. They found that making projections using historical data had been more reliable than some of the groundwater models that were in use.

In thinking about development of a GSP they felt there could be some difficulty in developing water balances due to lack of quality data for some locations. Another mild concern was the potential for disagreements about the selection of a groundwater model(s) or reconciling differences among methods.

Still another concern was the capacity of the GSAs and/or GSA members to fully participate. Some of these agencies are very lightly staffed and have varying levels of knowledge related to groundwater management. All of the participants had significant other duties prior to the passage of SGMA.

One concern, expressed after completion of the assessment, was the potential for some agencies to simply opt out of participating in the development of a GSP but still receive the benefits of the region having an approved plan without having contributed to the larger good of the subbasin.

3.5.4. Representation

The State Board lists the following as <u>Required Interested Parties</u> for the purpose of SGMA outreach:

- All Groundwater Users
- Holders of Overlying Rights (agriculture and domestic)
- Municipal Well Operators and Public Water Systems
- Tribes
- Counties
- Planning Departments /Land Use
- Local Landowners
- Disadvantaged communities
- Business

¹¹ Ibid



- Federal Government
- Environmental Uses
- Surface Water Users (if connection between surface and ground water)

All of these stakeholder categories were contacted in the interview process excepting tribes. In the case of tribes, there are no classified tribal lands in the Delta-Mendota subbasin, therefore no planning, outreach or communication needs are currently anticipated for tribes.

Due to subbasin characteristics, a primary focus of the assessment was on agricultural,

disadvantaged communities (DACs) and municipal groundwater users.

• Related to Agricultural Representation - most respondents believed that the elected leadership of the GSA agencies would do a good job in representing agriculture and noted that many of them were growers themselves. It was also noted that farmers were



busy and would be far more interested in any specifics of a GSP that would impact operations or the degree of certainty about water availability than the particulars of GSA governance.

 Regarding DACs - Much of the subbasin and its counties (San Joaquin, Stanislaus, Merced, and Fresno) have communities that meet the DAC definition and the region is generally considered disadvantaged. The ability of DACs to participate in GSP development was considered limited and it was thought that there would be a need for specific and direct outreach to DACs through elected leadership and via use of trusted community advocates. As part of the SA, several of those interviewed identified themselves as being able to represent a DAC perspective and one in particular was particularly concerned about the availability of Spanish language materials. As a result, Spanish language materials were included in the meeting materials of the public GSA adoption meetings and the SLDMWA provided a fluent Spanish speaker to assist with meetings.

In the past, to promote DAC identification and involvement, the Westside-San Joaquin IRWM previously conducted an extensive survey of private and public community representatives to educate and encourage understanding of the IRWM process, to help understand the issues confronted by DACs, and to

better address the needs of minority and/or low-income communities. This effort resulted in identification of DACs in the Region and an initial list of 22 projects that would benefit DACs and low-income communities. Given known constraints on this community it is recommended that more focused DAC outreach should be coordinated with the IRWM. This effort is now in progress.

- *Regarding Municipals* The SA outreach also included interviewing Municipal Stakeholders. A significant number of the Cities are fully dependent on wells for water supply and issues related groundwater management are of grave concern. These representatives all felt that even while it would be difficult to make time to participate in GSAs and GSP development, that they must make the time. Many had also determined that they wished to form their own GSA to reflect their specific interests in any kind of broader GSP negotiation.
- Regarding Environmental Interests There appeared to be a less defined stakeholder segment representing traditional, environmentally focused issues. Outreach was made to subbasin government agencies that often serve as a surrogate for these interests and an informal consultation occurred with a representative of the Planning and Conservation League to identify any known, active stakeholders. However, no specific entity or individual was identified by those contacted. A general perception was that this community would desire engagement and would designate representatives if the GSP development was thought to potentially impact existing restoration or other environmental concerns but the formation of GSAs per-se, was of less interest. The next phase of communications should include outreach to organizations such as Audubon, the Nature Conservancy and Ducks Unlimited just to ensure due diligence. These connections will be important going forward, particularly if environmental issues are identified.
- Regarding Industrial Users The region includes some industrial water users. This sector has a relatively lower percent of water use compared to other subbasins users; however, representatives of the sector pointed out how essential access to water was to their industry. The interviewees also emphasized how important these industries were to the local economies. There was a stated concern about representation since there didn't appear to be a direct way to engage, particularly with multiple GSAs being formed.





• Regarding Counties & Planning Agencies – All of the subbasin counties have designated representatives and all are assisting with GSA coverage for areas not otherwise covered by a GSA. All of the city and county representatives had direct engagement with the planning arms of their jurisdictions, or were staff to the planning departments. These representatives, like the municipal representatives, viewed this as critical issue even as it creates new workload for the already busy entities.

3.5.5. <u>Communications and Facilitation Preferences</u>

Participants were asked to describe their communications preferences. Several offered specific suggestions on written materials. Most did not believe there would be a need for a high frequency of communications directly with non-GSA stakeholders.

Several suggested using regularly scheduled activities of existing groups and gatherings to share information rather than creating stand-alone events. They listed annual meetings of the water agencies as one good venue as well as meetings related to the IRWM and Irrigated Lands. Several also thought that it would be good to go to places like Farmers Markets, particularly for the disadvantaged communities, and County Fairs.

Farm Bureau representatives also indicated a willingness to support outreach efforts. The Merced Farm Bureau, in particular, has already helped to advertise public meetings related to GSA formations.

Related to facilitation there was not a broad exposure to professional facilitators among many of the stakeholders. Even so, participants consistently listed qualities such as fairness and transparency, a good understanding of the issues, and confidence as helpful facilitator strengths. There was a sense that the GSAs would not need hand holding but that facilitation could be useful for helping the stakeholders forge decisions and making what many believed would need to be compromises.

3.5.6. Success Factors, Barriers to Success

The participants were asked to describe their view on the odds for success as well as any barriers that would prevent successful completion of a GSP.

Overall, most participants expressed a medium to high likelihood for success. They noted that the carrot (grants and technical support) and stick (significant regulatory intervention) by the State creates a dynamic that is supportive to success.

Participants stated barriers related to the capacity of the GSAs to participate and ultimately agree to, and implement changes. The much diffused governance structure of multiple GSAs amplifies this dilemma as do actions beyond the control of the subbasin entities (such as climate and water deliveries).

In addition to perceived barriers, participants outlined their thoughts on opportunities and success strategies.

- Drought While the drought was unwelcome it increased awareness of the need for changes. Many felt it would be easier to move forward while the topic is prominent in everyone's minds.
- Short and Long Game Several suggested it will be important to have a plan that includes long and short term strategies and activities.
- Integrated Planning Many of the participants emphasized the importance of integrated planning.

3.5.7. Other Comments and Advice

Many participants expressed appreciation for being contacted and invited the facilitator to contact them again if there were questions.

3.6. **Promising messages and methods**

Three primary communications strategies have already been identified for the GSP(s) development:

- Leveraging the activities of existing groups
- Providing targeted, communications and outreach to opinion leaders in key stakeholder segments
- Providing user friendly information and intermittent opportunities for a broader range of stakeholders

The same strategies aligned with the recommendations of the SA participants. These methods will allow stakeholders to engage commensurate with their degree of interest while providing sufficient information to ensure long-term success for plan development and implementation.

AUDIENCES AND MESSAGES

GSA formation and GSP(s) development, like most large planning efforts, consists of a broad range of stakeholders with differing interests and influence.

4.1. Two Core Audience Segments

This Coms Plan Anticipates two core audience segments. First is the subbasin GSA Boards and the communications among and between themselves. This audience segment is significant in size given that 23 GSAs will be working to develop a GSP(s) and each GSA has its own Board and audiences.

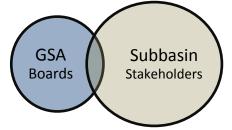


Figure 9. Two Core Audience Segments

The second audience is the subbasin stakeholders as identified in SGMA. This audience is also large. Many of the stakeholders are shared by the GSA Boards and some of the larger stakeholder segments are also represented on the GSA Boards (see **Figure 9**).

Nearly all of the communications strategies apply to both segments; however, some strategies apply to one or the other specifically and are so identified.

4.2. Communications and Change Management

The process of adopting and implementing a GSP will require significant change management. Communications planning should encompass basic change management approaches. Messages should also evolve over time and be tied to the planning process and key decision points. Then, for each audience and each major planning step, communications must do the following:

- 1. Describe what the actual proposed plan (change) is
- 2. Articulate how the change will directly impact the category of stakeholder involved
- 3. Outline the methods that will be used to implement the plan (change)
- 4. Define the costs and benefits of changing and not changing, and what future conditions will be if change does not occur
- 5. Consider unintended consequences and others that may also be impacted by the same change then develop a strategy to engage them
- 6. Offer opportunities for input and for stakeholders and others to improve the approach

The communications requirements for large changes are often underestimated. Some experts indicate that messages may need to be delivered up to 8 different times to be fully absorbed. Communications needs will also evolve as the GSP planning progresses. **Table 4** provides a sample of early communications that focus on SGMA and groundwater basics.

Element	What the Change Is	How it will affect the Stakeholder	How the change will be Implemented	Why it is a good idea
Early Phase GSP Development	 Locally governed GSAs will work together to sustainably manage ground water. The Subbasin /Basin is required to ensure Sustainable Groundwater Management by submitting a sustainability plan by 2020. The plan must be implemented and found to result in sustainable management by 2040. 	 (Unique to audience type) Changes in the current methods of acquiring and utilizing groundwater may occur. May affect future decisions related to crop types and decisions related to crop types and decisions related to conjunctively using surface water. May provide additional project resources to the DAC communities. 	A collaborative approach is being undertaken to prepare the plan with multiple GSAs coordinating with the SLDMWA as the planning organizer.	 Sustainable and wise use of groundwater allows for the success of future generations and creates greater certainty for today's beneficial users. Failure to act may result in negative regulatory consequences.

Table 4. Sample –	Early Phase Messag	e Elements for Sul	basin Stakeholders
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As part of the GSP planning process, the next phase of communications will also need to communicate the requirements for sustainability and how they are achieved in the context of the Delta-Mendota subbasin. Then, communications related to GSP specifics and adoption will require additional outreach, targeted to specific audiences.

4.3. Tied to Decision Making

Communications should also be tightly linked to decision making. For each anticipated decision, stakeholders for that decision should be identified and the following addressed.

- 1. Who (Is the stakeholder)
 - a. An impacted party?
 - b. A potential planning partner?
 - c. A potential provider of services or resources?
 - d. A regulator of the activity?

(Note: Maybe more than one category.)

- 2. What (What is the interest of the stakeholder? How will the stakeholder be affected? What are the stakeholders' needs?)
- 3. Who (Who is the right messenger for the information)
- 4. How (How should the information be delivered? What are the best methods?)
- 5. When (What is the appropriate timing for the messages?)
- 6. Engagement and Knowledge Transfer (How do we create two-way communications?))

Table 5 illustrates some of these ideas.

Table 5. Communications Planning Questions

Who	Interest	Messenger	Delivery	Timing	Knowledge Transfer
 Impacted Partner Provider Regulator 	 How will decision affect? What will stakeholder need? 	 Who is a trusted information Source? How do we ID and Partner 	• What are the best delivery methods?	• When should we conduct outreach?	• What do the stakeholders know that we need to know?

4.4. GSA Boards

Due to the multiple subbasin GSAs, specific focus is needed on communications to keep them informed, provide consistent updates and information that the Boards can use in their own outreach, and support their decision making. Primary objectives for communications with the subbasin GSA Boards are to ensure:

- Consistent understanding of the requirements for a GSP and/or GSP coordination
- On-going access to current information
- Timely notice of any significant developments or decision points that may require changes to policies and/or require some other board action
- Confidence that the GSP(s) will be accepted by the GSA's stakeholders

Key communications activities involving the Board include;

- 1. Providing short and digestible pieces of information to ensure each Board member can quickly articulate to his/her constituents on key matters and remain sufficiently informed so that no decision points are surprises.
- 2. Provide user-friendly informational materials to be used with public audiences, and will support the Board with their own constituent outreach.
- 3. Utilize regular Board communications for routine updates and reserve specific Board agenda items for highly significant discussion items.

4.5. Primary Audiences

There are several core stakeholder groups that will require ongoing communications and tailored messaging throughout the planning process. They are:

- Agriculture
- Disadvantaged Communities
- Municipals

Other stakeholders requiring special consideration include:

- Industrial Users/ Business
- Regulators (State and Federal)
- Potential Partners
- Environmental Organizations
- Federal Agencies

While all of the stakeholder types are important to engage for development of a GSP, the first three will be most affected by any changes that might be proposed as a result of the *GSP(s)*.

The following provides an outline of key messages and activities in support of each of the audience types.

4.2.1. Agricultural

Messages about the GSP(s) development should feature the overall desirability of a sustainable management approach how the plan will contribute to management certainty and protect against regulatory oversight.

In thinking about irrigation users it is also important to remember that one size does not fit all.

4.2.2. Disadvantaged Communities

Messages developed for this sector should be tailored and specific to the community. This type of outreach is often best served by use of surrogates and trusted messengers. As identified in the SA, these messages should be aligned with activities of the IRWM, especially given the high, current dependence of many on unsustainable water sources. Messages about ways to access the increased availability of resources due to grant incentives should also be considered.

A specific outreach method to consider relates to the predominance of cells phones within the communities. According to the Pew Research Center, "over 50 percent of low-income households own a smartphone. Smartphone penetration in this demographic creates substantial opportunities for utilities to reach disadvantaged communities with software solutions like customer self-service platforms and targeted digital communications."¹²

4.2.3. Municipals

¹² Secondary Source: Water Smart. <u>https://www.watersmart.com/rethinking-disadvantaged-community-engagement/</u> (accessed June 1, 2017)

Some care will be needed to address tensions related to the relative percentages of use by Municipal agencies and what constitutes highest and best beneficial uses within an agricultural region. A promising interaction with this community would involve collaboration on messaging to achieve mutually beneficial goals.

Some thought it might be possible for the municipal agencies to provide in-kind support to the GSP development process through support for project websites and mailing lists, production of meeting notices, assistance to the planning process from in-house public information professionals and offering access to physical meeting spaces.

Municipals may need assistance in making the case for the need to think at a Basin scale rather than more local terms.

4.2.4. Business and Industry Interests

Business and industry interests seek assurances about the availability of water for operations and the viability of the farming industry in the region. Messages for these audiences should focus on how the GSP(s) development will contribute to sustainability and how these audiences can participate in discussion specific to their interests.

4.2.5. <u>Regional/Statewide Interests and Regulators</u>

Some degree of uncertainty remains in the overall legal, legislative and regulatory environment as it relates to SGMA implementation.

It is in the interest of the subbasin stakeholders to engage state and federal agencies and regulators throughout the process. These parties may have resources to assist the subbasin and a cooperative attitude will build good will in the event that adjustments are needed to achieve SGMA compliance.

4.2.6. Potential Agency Partners

A variety of collaborations to achieve GSP(s) development goals may be possible. The GSAs should consider the potential for collaboration with non-GSA members and inter-basin (adjacent subbasin) partners, as part of plan deliberations.

4.2.7. GSP Coordinators Planning Forum

A planning forum for subbasin GSP coordinators should be established to further inform a coordination strategy. This forum would include agency representatives as well as the consultant teams and be used for the sole purpose of coordination and mutual support. It is anticipated that this body might meet on a quarterly or as needed basis. This forum would also provide a central point of contact for adjacent subbasin coordinators.

4.2.8. Environmental Community

As noted in the SA, this community will be interested in a GSP features. The focus of messaging for this group being on how the GSP(s) development will contribute to a sustainable regional water portfolio. Special effort should be made to identify specific

topics of interest. For example, as part of GSP development, a list of groundwater dependent species may be created, or impacts to wetlands may be identified. These types of lists would highlight where input from the environmental community might be needed.

4.2.9. Federal Government

Federal representatives interviewed for the assessment asked to be kept informed of subbasin SGMA activities. These agencies have a direct interest in surface water integration as well as SGMA activities that could impact wetlands restoration efforts or groundwater dependent ecosystems and species.

RISK MANAGEMENT

Risk management is the identification, assessment, and prioritization of risks (defined as *the effect of uncertainty on achieving objectives*) followed by coordinated, efficient and economical strategies and actions to minimize, monitor, and control the probability and/or impact of negative events. Strategies and actions may also be used to avert risk by leveraging strengths and opportunities.

Risks can come from uncertainty in economic factors, threats from project failures (at any phase), regulatory and legal uncertainties, natural causes and disasters (drought, flood, etc.), as well as dissention from adversaries, or events of uncertain or unpredictable circumstances. Several risk management standards have been developed. This analysis utilizes those from the Project Management Institute.

 Table 6 outlines standardized risk categories and translates them to outreach risks.

RISK CATEGORY	Outreach RISK FACTORS		
Technical, quality, or performance	Realistic performance goals, scope and		
	objectives		
Project management	Quality of outreach design		
	Outreach deployment and change		
	management		
	Appropriate allocation of time and		
	resources		
	Adequate support for Outreach in project		
	management plans		
Organizational / Internal	Executive Sponsorship		
	Proper prioritization of efforts		
	Conflicts with other functions		
	Distribution of workload between		
	organizational and consultant teams		
Historical	Past experiences with similar projects		
	Organizational relations with stakeholders		
	 Policy and data adequacy 		
	 Media and stakeholder fatigue* 		
External	Legal and regulatory environment		
	Changing priorities		
	Risks related to political dynamics		

Table 6. Risk Factors

5.1. Technical, quality, or performance

The subbasin is fortunate to have a high level of water knowledge and skilled personnel available to assist with GSP planning. In general, stakeholder expectations for outreach and performance goals, scope and objectives are attainable. The larger concern in this category is properly communicating the scope of the GSP(s) development and the need for extensive coordination and outreach among a number of parties. Communication of SGMA

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requirements for outreach as a planning requirement should be an ongoing consideration and appears to be underestimated in emphasis.

5.2. Project management

A number of positive project management factors are present for the GSP(s) development outreach. Project managers view outreach as an important planning element. The outreach design is based on best management practices and industry standards. It is not overly complicated and with technical services support from DWR and other sources, sufficient resources should be available to properly execute it. Procedures and practices are already in place that can be leveraged to achieve communication goals.

The primary concern in this category relates to GSP coordination. This type of outreach will require additional assessment as the individual GSAs will determine their own protocols for representation.

5.3. Organizational / Internal

Conflicts with other GSA member functions and/or conflicts with outreach activities by efforts that include the same stakeholders (e.g. Irrigated Lands, IRWM, and CV-Salts) should be monitored.

One additional consideration will be the distribution of workload between GSA, organizational and consultant teams. Clear roles and responsibilities must be defined and continuous interaction in place to ensure successful execution.

The GSP(s) development process will also need identified, high level spokespersons or champions. These individuals should be able to discuss subbasin planning with the media, in discussions with regulators and potentially at professional conferences.

5.4. External

The legal and regulatory environment of the GSP(s) development process is complex and evolving. Ongoing issues with surface water deliveries and changing agricultural market conditions are outside of the control of the parties. It will be important for mechanisms to be in place that allow for relatively rapid responses to changing conditions.

5.5. Historical

The primary stakeholders in this process generally view interactions and meetings as productive. There is a history of cooperation and a willingness to work together to save costs and achieve better outcomes.

TACTICAL APPROACHES

Following are specific tactical approaches that may be utilized to deliver the activities, messages, and recommendations of the previous chapters. These approaches are based on best communication practices and grounded in the public participation philosophy of the International Association for Public Participation, Public Participation Spectrum as illustrated in **Table 7**.

The Spectrum represents a philosophy that outreach should match the desired level of input from both the stakeholder and the organizational entity.

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Table 7. IAP2 Public Participation Spectrum IAP2 Public Participation Spectrum

Developed by the International Association for Public Participation

INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
Public Participation Goal:	Public Participation Goal:	Public Participation Goal:	Public Participation Goal:	Public Participation Goal:
To provide the public with balanced and objective information to assist them in understanding the problems, alternatives and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public issues and concerns are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision-making ir the hands of the public.
Promise to the Public:	Promise to the Public:	Promise to the Public:	Promise to the Public:	Promise to the Public:
We will keep You informed.	We will keep you informed, listen to and acknowledge concerns and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and issues are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for direct advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.
Example Tools:	Example Tools:	Example Tools:	Example Tools:	Example Tools:
Fact sheetsWeb SitesOpen houses	 Public comment Focus groups Surveys Public meetings 	 Workshops Deliberate polling 	 Citizen Advisory Committees Consensus- building Participatory decision-making 	Citizen juriesBallotsDelegated decisions

Based on the assessment findings for the GSP(s) development, most stakeholders would simply like to be <u>INFORMED</u> unless there is a potential for significant changes that may include that stakeholder. Tactics for this group will include fact sheets, websites, open houses, briefings, and informational items placed in publications they already read.

The next largest group of stakeholders, primarily groundwater pumpers and disadvantaged communities, wish to be <u>CONSULTED</u>. This group will have access to all the materials

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prepared as part of the informational phase. In addition they should be invited to provide comments on written materials and planning concepts and participate in focused workshops and/or briefings. They should also be invited to attend larger public meetings.

The development of some GSP features may require a higher degree of <u>INVOLVEMENT</u>. This would focus on engagement of a subset of stakeholders that may experience significant impacts associated with SGMA.

<u>COLLABORATION</u> opportunities have also been identified; however, they are of a different character than defined in the Spectrum. Collaboration in this GSP(s) development process will focus on working with partners that have mutual goals to achieve those goals together. This will more resemble a partnership than a public engagement activity.

6.1. Communications Coordination.

Each GSA is required to perform legally mandated outreach activities and the GSP submission guidelines require a minimum level of engagement.

The subbasin GSAs should coordinate outreach activities even if there is a decision to move forward with multiple GSPs. In addition to efficiency and cost savings (the GSAs can share resources) this strategy will allow for consistency in messaging and reduce confusion for stakeholders that may not know what GSA jurisdiction they are in, and/or are in multiple GSA jurisdictions. Following are suggested options for communications coordination.

- 1. Website
- 2. Meeting calendar
- 3. Branded informational Flyers, Templates, PowerPoint Presentations, etc.
- 4. Periodic newsletter
- 5. GSP related mailing lists
- 6. Descriptions of interested parties
- 7. Issues and interest statements for legally mandatory interested parties
- 8. Public workshops
- 9. Message calendar
- 10. Press releases and guest editorials
- 11. Speakers Bureau
- 12. Existing group venues
- 13. Outreach documentation

6.2. Tactics

6.2.1. <u>Website</u>

As part of the communications plan development, a list of website concepts and draft website content was prepared. The following describes the proposed approach:



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- a. <u>Centralized</u> Establish a centralized website for the entire subbasin.
- b. <u>Individual GSAs</u> Posting of material to a website is part of the SGMA requirements. Those GSAs with their own webpages can link to and from the centralized site if they wish to provide their own customized information. For those GSAs without their own website, courtesy pages would be provided as an added feature of the main site. The courtesy pages would all use a single template with the same information to facilitate easy management and updates. Individual GSAs choosing to take advantage of the courtesy pages would be responsible for ensuring that information is current. The page should include a "Last Updated" box to indicate the timeliness of the information.
- c. Basic features A basic website framework has already been developed along with introductory information that has prepopulated each page.
 Figure 10 illustrates the basic content of the site and includes:
 - 1. Background information
 - 2. Information about getting involved, including meeting information
 - 3. A separate link for Spanish Language materials
 - 4. Frequently asked questions
 - 5. Links to GSAs
 - 6. Contact information

Should a GSA decide to not participate in the Central website, a similar structure could be utilized.

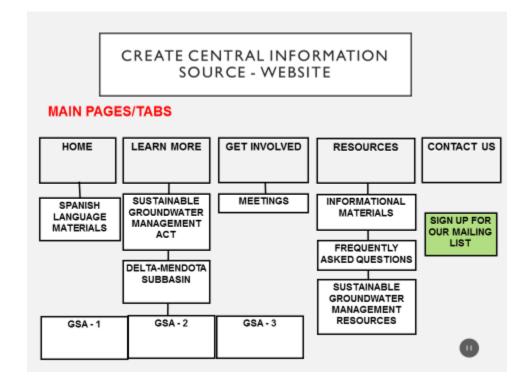


Figure 10. Website Structure

6.2.2. <u>Meeting Calendar</u>

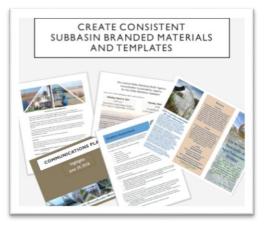
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A shared meeting calendar will provide a one-stop shop for stakeholders and assist in preventing meeting conflicts while creating more potential for shared activities. This calendar should include current and scheduled meetings and workshops as well as serve as the repository for agendas and meeting notes, along with copies of meeting materials and presentation.

An integrated project calendar should also be developed that links planning project milestones with communications milestones.

6.2.3. <u>Branded Informational Flyers,</u> <u>Templates, PowerPoint</u> <u>Presentations, etc.</u>

Subbasin level materials should have a single look and feel to create on-going consistency and visual recognition by stakeholders. Use of templates, shared presentations and flyers will create efficiencies and reinforce messaging. This communications plan incorporates some of this type of branding.



6.2.4. <u>Periodic Newsletter</u>

The need for regular communications cannot be overstated. One option is production of a periodic newsletter. Given the relatively short GSP(s) development process timeframe and the GSP development requirements for periodic outreach to identified stakeholders, a quarterly schedule would be realistic and achieve compliance with SGMA requirements for periodic updates to stakeholders. The newsletter should be designed so that individual GSAs can add tailored information if they choose to. For Portable Document Format (PDF) versions of the newsletter, a GSA could add a simple one or two page insert and the edition could be used as a handout or mailer. For a professional looking, email version of the newsletter, we recommend free or low cost services such as Mail Chimp or Constant Comment, which can be integrated with mailing lists.

Adding GSA specific information to an email newsletter can be done with web-links in the email to the very same PDF page prepared for the hardcopy mailer. An alternative is emailing the entire newsletter PDF as an attachment (although this format is less likely to be read than the mailer services).

6.2.5. <u>GSP related mailing lists</u>

Each GSA is required to develop notification lists. A central list may be utilized for GSP(s) related notifications.

6.2.6. Descriptions of Interested Parties

Each GSA is required to develop descriptions of interested parties. These lists should be updated and merged for use in the GSP(s) submittal(s). These can also be provided as background information on the website as part of constructing an administrative record. The SA in Chapter 4 provides an initial start for this documentation.

6.2.7. Issues and Interest Statements for Legally Mandatory Interested Parties

A GSP submission must include a statement of interests for listed stakeholders. As suggested earlier, this can also be included on the website.

6.2.8. <u>Coordinated Public Workshops</u>

SGMA requires a series of public hearings and some public workshops. Such workshops should be coordinated with other subbasin entities.

During the GSA formation process the County of Merced and a forming GSA body conducted a joint workshop to explain more about SGMA and the proposed GSA formation. Distribution of meeting flyers and notices was done concurrently, and DWR attended the event to answer questions. The GSP development process will offer similar opportunities, not only within the subbasin, but with adjacent subbasins.

6.2.9. <u>Message Calendar</u>

Basic messages should be associated with the planning schedule and each stage of GSP(s) development and serve as the theme for the communications materials being generated. For example, during the GSA formation period there was a need to communicate the basics of SGMA and groundwater management. During the GSP(s) initiation phase messages should



focus on the basics of groundwater sustainability and the current state of the subbasin. As the GSP(s) begins to take form the specifics of the GSP(s) and what it means for each stakeholder would be the focus.

6.2.10. Press Releases and Guest Editorials

At some point in the GSP development and implementation process, it is likely that stakeholders will be asked to make changes and/or financially support a sustainability effort. It will be more productive for the GSAs and their GSP collaboration partners to frame discussions about these changes than to have others, perhaps with less knowledge, do so on their behalf. For that reason there is a need for press releases and/or guest editorials to offer the media and stakeholders accurate information offered in the context of SGMA. This type of outreach should be closely coordinated as consistency in messages is critical to stakeholder acceptance.

Chapter 6

6.2.11. Speakers Bureau

Efforts should be made to conduct outreach at events and meetings that already occur (e.g. Farm Bureau meetings, Rotary Club, etc.). A list of knowledgeable presenters should be developed in the event an organization or other entity would like a presentation. Speakers Bureau engagements should be recorded on the planning project meeting calendar.

6.2.12. Existing Group Venues

Fully leverage the activities of existing groups.

- Maintain a roster of existing groups and typical meeting schedules with a nexus to GSP(s) development. Add the dates to the messaging calendar.
- The list of audiences, messages and existing groups should be referenced when there is a need to deploy information.
- Conduct informal outreach with the leaders of such groups to determine the best way to interact.
- Determine what communications channels these groups are using and equally leverage these, for example by placement of articles in newsletters.

6.2.13. Outreach Documentation

A central point of contact should be identified on the website and an outreach statistics inventory should be established that identifies dates, times, audiences and attendance. This information will be also be useful in conducting follow up with stakeholders as well as documenting outreach as part of GSP submittal guidelines.

6.3. Procedural and Legally Mandated Outreach

A discussion of SGMA outreach requirements was provided in Chapter 1 and a full list of requirements is contained in Appendix 1. One major feature of the requirements is a submission to DWR of the opportunities that interested parties will be given to participate in the GSP deliberations. The Situation Assessment provides an initial description that can be added to with additional outreach.

Following are the <u>Required Interested Parties</u> for the purpose of mandated outreach:

Table 9 provides a list of the mandated outreach and the timeframe in which isrequired.

Timeframe	Item
Prior to initiating plan	1. Statement of how interested parties may contact
development	the Agency and participate in development and implementation of the plan submitted to DWR.

Table 8. Mandated Outreach

Timeframe	Item		
	2. Web posting of same information.		
Prior to plan development	 Must establish and maintain an interested persons list. 		
	 Must prepare a written statement describing the manner in which interested parties may participate in GSP development and implementation. Statement must be provided to: Legislative body of any city and/or county within the geographic area of the plan Public Utilities Commission if the geographic area includes a regulated public water system 		
	regulated by that Commission c. DWR d. Interested parties (see Section 10927) e. The public		
Prior to and with GSP submission 90 days prior to GSP Adoption Hearing 90 days or less prior to GSP Adoption Hearing	 Statements of issues and interests of beneficial users of basin groundwater, including types of parties representing the interests and consultation process Lists of public meetings Inventory of comments and summary of responses Communication section in plan that includes: Agency decision making process ID of public engagement opportunities and response process Description of process for inclusion Method for public information related to progress in implementing the plan (status, projects, actions) Prior to Public Hearing for adoption or amendment of the GSP, the GSP entities must notify cities and/or counties of geographic area 90 days in advance. Prior to Public Hearing for adoption or amendment of the GSP, the GSP entities must: 		
	 a. Consider and review comments b. Conduct consultation within 30 days of receipt with cities or counties so requesting 		
GSP Adoption or Amendment	1. GSP must be adopted or amended at Public Hearing.		
60 days after plan submission	 60-day comment period for plans under submission to DWR. Comments will be used to evaluate the submission. 		
Prior to adoption of fees	 Public meeting required prior to adoption of, or increase to fees. Oral or written presentations may be made as part of the meeting. Public notice shall include: a. Time and place of meeting b. General explanation of matter to be considered 		

Timeframe	Item		
	 c. Statement of availability for data required to initiate or amend such fees d. Public posting on Agency Website and provision by mail to interested parties of supporting data (at least 20 days in advance) 		
	 Mailing lists for interested parties are valid for 1 year from date of request and may be renewed by written request of the parties on or before April 1 of each year. 		
	 Includes procedural requirements per Government Code, Section 6066. 		
Prior to conducting a fee adoption hearing.	1. Must publish notices in a newspaper of general circulation as prescribed.		
	2. Publication shall be once a week for two successive weeks. Two publications in a newspaper published once a week or oftener, with at least five days intervening between the respective publication dates not counting such publication dates, are sufficient.		
	 The period of notice begins the first day of publication and terminates at the end of the fourteenth day, (which includes the first day.) 		

6.4. Items for Future Consideration

This GSP(s) Coms Plan outlines an outreach effort based on project and stakeholder needs and preferences. This document has been prepared as a working draft living document and should be updated as new information and the GSP(s) development process needs are developed.

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MEASUREMENTS & EVALUATION

A guiding principle for evaluation and measurement of the Coms Plan's success is to provide regular, unbiased reporting of progress toward achieving goals. Success may be evaluated in several ways, including process measures, outcome measures, and an annual evaluation of accomplishments. Optional evaluation measures are described below.

As part of each outreach effort debrief the following process and outcome measures will be discussed and recorded in a check sheet. The check sheets will be prepared with the goal of continuous improvement rather than criticisms.

7.2. Process Measures

Process measures track progress toward meeting the goals of the Coms Plan. These include:

- Level of attendance at outreach meetings
- Shared understanding of the overarching aims, activities, and opportunities presented by different planning approaches and project activities
- Productive dialogue among participants at meetings and events
- Sense of authentic engagement; people understand why they have been asked to participate, and feel that they can contribute meaningfully
- Timely and accurate public reporting of planning milestones
- Feedback from Coordinating Body and GSA members, regulators, stakeholders, and interested parties about the quality and availability of information materials
- Level of stakeholder interest in the GSP(s) development process information

7.3. Outcome Measures

Outcome measures track the level of success of the Coms Plan in meeting its overall goals. Some outcome measures considered for the GSP(s) development process include the following:

- Consistent participation by key stakeholders and interested parties in essential activities. Participants should have no difficulty locating the meetings, and should be informed as to when and where they will be held.
- Response from meeting participants that the engagement methods provided for a fair and balanced exchange of information.
- Feedback from interested parties that they understand how their input is used, where to track data, and what results to expect.
- The project receives quality media coverage that is accurate, complete and fair.

7.4. Mid-cycle Evaluation of Accomplishments

A mid-cycle evaluation provides an opportunity to examine the current effectiveness of the Coms Plan and provides a chance to reevaluate strategies to meet the GSP(s) development process objectives. The evaluation tasks may include:

- Preparation of an executive-level summary detailing high-level initiatives and accomplishments of the previous cycle. This evaluation should also include positive news, best practices, goals and objectives, notable changes, timelines, and priorities.
- Identifying gaps and areas for improvement.
- Highlighting how gaps and areas for improvement in the cycle has been addressed.
- Outlining process and outcome measures and their current results.

ROLES AND RESPONSIBILITIES

The GSP(s) development Coms Plan outlines numerous strategies, activities and tactics. While none are highly complex, there is a requirement for coordination and clarity regarding who will be responsible for executing the tasks.

After the planning team evaluates the timelines and priorities for each of the communications activities a recommended next step is completion of a Responsible, Accountable, Consulted, and Informed (RACI) Chart. This Chart, as displayed in **Table 10**, outlines key tasks and the assignment of roles and responsibilities for accomplishing them.

Activity TYPE	SPECIFIC PRODUCT	RESPONSIBLE	ACCOUNTABLE	CONSULTED	INFORMED
Internal Staff Communications, information materials for/briefings	Draft	Person A	Person E	Person I	
	Final Draft	Person A	Person E	Person I	Project Team
List Serves, mailing lists	Customer Contacts	Person B - Person A	Person E	Person I	Project Team
	Concurrent jurisdictions	Lisa Beutler/MWH	Person G	Person I	Project Team
	Other - identified stakeholders	Person A	Person G	Person I	Project Team
Web Content and Maintenance	Draft Content and Content Refresh	Lisa Beutler/MWH/	Person G	Person H	Project Team
	Site Administration	Person A	Person G	Person H	
General public Intro Packets, Fact Sheets and Brochures	Draft	Person D	Person E	Person I- Subject Matter Experts	Person J
	Revised Draft	Person D	Person E	Person I- Subject Matter Experts	Person J
	Final Draft	Person D	Person E	Person I- Subject Matter Experts	Project Team
Newsletter Content	Draft	Lisa Beutler/MWH	Person E	Person I- Subject Matter Experts	Person J
	Revised Draft	Person D	Person E	Person I- Subject Matter Experts	Person J
	Final Draft	Person D	Person E	Person I- Subject Matter Experts	Project Team

Table 9. Sample RACI Chart

Responsible

Those who do the work to achieve the task. There is at least one person with a role of *responsible*, although others can be delegated to assist in the work required.

Accountable (also approver or final approving authority)

This is the person ultimately answerable for the correct and thorough completion of the deliverable or task, and the one who delegates the work to those responsible. <u>There **may only** be only one *accountable* specified for each task or deliverable.</u>

Chapter 9

Consulted

Those whose opinions are sought, typically subject matter experts were people that are impacted by the activity; and with whom there is two-way communication.

Informed

Those who are kept up-to-date on progress, typically on the launch and completion of the task or deliverable. This is one way communication.

Role distinction

There is a distinction between a role and the individual assigned the task. Role is a descriptor of an associated set of tasks that could be performed by just one or many people.

In the case of the RACI Chart, the team may list as many people as is logical except for the Accountable role.

Scope of Work

Completion of the RACI Chart will also support development of any future scopes of work for consultant provided communication and outreach services.

LIST OF APPENDICES

Appendix 1-Public Outreach Requirements under SGMA

Appendix 2-Communications Governance

Appendix 1. Public Outreach Requirements under SGMA

GSP Regulations

CODE	PUBLIC OUTREACH REQUIREMENT
§ 353.6. Initial Notification (a) Each Agency shall notify the Department, in writing, prior to initiating development of a Plan. The notification shall provide general information about the Agency's process for developing the Plan, including the manner in which interested parties may contact the Agency and participate in the development and implementation of the Plan. The Agency shall make the information publicly available by posting relevant information on the Agency's website.	 Statement of how interested parties may contact the Agency and participate in development and implementation of the plan submitted to DWR. Web posting of same information. Timing: Prior to initiating development of a plan.
 § 353.8. Comments (a) Any person may provide comments to the Department regarding a proposed or adopted Plan. (b) Pursuant to Water Code Section 10733.4, the Department shall establish a comment period of no less than 60 days for an adopted Plan that has been accepted by the Department for evaluation pursuant to Section 355.2. (c) In addition to the comment period required by Water Code Section 10733.4, the Department shall accept comments on an Agency's decision to develop a Plan as described in Section 353.6, including comments on elements of a proposed Plan under consideration by the Agency. 	 60-day comment period for plans under submission to DWR. Comments will be used to evaluate the submission. Parties may also comment on a GSA's (or GSAs') statements submitted under section 353.6 Timing: For GSP Submittal - 60 days after submission to DWR
 § 354.10. Notice and Communication Each Plan shall include a summary of information relating to notification and communication by the Agency with other agencies and interested parties including the following: (a) A description of the beneficial uses and users of groundwater in the basin, including the land uses and property interests potentially affected by the use of groundwater in the basin, the types of parties representing those interests, and the nature of consultation with those parties. (b) A list of public meetings at which the Plan was discussed or considered by the Agency. (c) Comments regarding the Plan received by the Agency and a summary of any responses by the Agency. (d) A communication section of the Plan that includes the following: (1) An explanation of the Agency's decision-making process. (2) Identification of opportunities for public engagement and a discussion of how public input and response will be used. 	 Statements of issues and interests of beneficial users of basin groundwater, including types of parties representing the interests and consultation process Lists of public meetings Inventory of comments and summary of responses Communication section in plan that includes: Agency decision making process ID of public engagement opportunities and response process Description of process for inclusion Method for public information related to progress in implementing the plan (status, projects, actions) Timing: For GSP Submittal – with plan For GSP Development – continuous.

CODE	PUBLIC OUTREACH REQUIREMENT
(3) A description of how the Agency encourages the active	in the project schedule and
involvement of diverse social, cultural, and economic	information posted on web.]
elements of the population within the basin.	
(4) The method the Agency shall follow to inform the public	
about progress implementing the Plan, including the status	
of projects and actions.	
§ 355.2. (c) Department Review of Adopted Plan	1. 60 day public review period for public
(c) The Department (DWR) shall establish a period of no less than	comment on submitted plan.
60 days to receive public comments on the adopted Plan, as	
described in Section 353.8.	Timing : After GSP Submittal to DWR – 60
	days
§ 355.4. & 355.10 Criteria for Plan Evaluation	1. Required public outreach and
The basin shall be sustainably managed within 20 years of the	stakeholder information is submitted,
applicable statutory deadline consistent with the objectives of the	including statement of issues and interests
Act. The Department shall evaluate an adopted Plan for	of beneficial users.
compliance with this requirement as follows:	2. Public and stakeholder comments and
(b) (4) Whether the interests of the beneficial uses and users of	questions adequately addressed during
groundwater in the basin, and the land uses and property	planning process.
interests potentially affected by the use of groundwater in the	
basin, have been considered.	Timing : For GSP Submittal – <i>with plan</i>
 (10) Whether the Agency has adequately responded to	For resubmittal related to corrective action
comments that raise credible technical or policy issues	- with submittal
with the Plan.	

California Water Code

CODE	PUBLIC OUTREACH REQUIREMENT
10720. This part shall be known, and may be cited, as the	1. Tribes and the federal government may
"Sustainable Groundwater Management Act."	voluntarily participate in GSA
10720.3	governance and GSP development.
(a) This part applies to all groundwater basins in the state.	Timing : Prior to initiating development of a
 (c) The federal government or any federally recognized Indian tribe, appreciating the shared interest in assuring the sustainability of groundwater resources, may voluntarily agree to participate in the preparation or administration of a groundwater sustainability plan or groundwater management plan under this part through a joint powers authority or other agreement with local agencies in the basin. A participating tribe shall be eligible to participate fully in planning, financing, and management under this part, including eligibility for grants and technical assistance, if any exercise of regulatory authority, enforcement, or imposition and collection of fees is pursuant to 	plan.

CODE	PUBLIC OUTREACH REQUIREMENT
the tribe's independent authority and not pursuant to authority	
granted to a groundwater sustainability agency under this part.	
CHAPTER 4. Establishing Groundwater Sustainability Agencies	
[10723 - 10724]	
10723.	1. Must hold public hearing in the county
a) Except as provided in subdivision (c), any local agency or combination	or counties overlying the basin, prior to
of local agencies overlying a groundwater basin may decide to become	becoming a GSA
a groundwater sustainability agency for that basin.	
(b) Before deciding to become a groundwater sustainability	Timing: Prior to becoming a GSA.
agency, and after publication of notice pursuant to Section 6066	
of the Government Code, the local agency or agencies shall hold	
a public hearing in the county or counties overlying the basin.	
10723.2	1. Must consider interest of all beneficial
The groundwater sustainability agency shall consider the	uses and users of groundwater.
interests of all beneficial uses and users of groundwater, as well as	2. Includes specific stakeholders as listed.
those responsible for implementing groundwater sustainability	
plans. These interests include, but are not limited to, all of the	Timing : During development of a GSP.
following:	
(a) Holders of overlying groundwater rights, including:	
(1) Agricultural users.(2) Domestic well owners.	
(b) Municipal well operators.	
(c) Public water systems.	
(d) Local land use planning agencies.	
(e) Environmental users of groundwater.	
(f) Surface water users, if there is a hydrologic connection between	
surface and groundwater bodies.	
(g) The federal government, including, but not limited to, the	
military and managers of federal lands.	
(h) California Native American tribes.	
(i) Disadvantaged communities, including, but not limited to, those	
served by private domestic wells or small community water	
systems.	
(j) Entities listed in Section 10927 that are monitoring and	
reporting groundwater elevations in all or a part of a	
groundwater basin managed by the groundwater sustainability	
agency.	
10723.4.	3. Must establish and maintain an
The groundwater sustainability agency shall establish and maintain	interested persons list.
a list of persons interested in receiving notices regarding plan	4. Any person may ask to be added to the
preparation, meeting announcements, and availability of draft	list
plans, maps, and other relevant documents. Any person may	
request, in writing, to be placed on the list of interested persons.	Timing: On forming a GSA.
10723.8.	1. Creates notification requirements that
(a) Within 30 days of deciding to become or form a groundwater	include:
sustainability agency, the local agency or combination of local	a. A list of interested parties
agencies shall inform the department of its decision and its	b. An explanation of how interests will
intent to undertake sustainable groundwater management. The	be considered

CODE	PUBLIC OUTREACH REQUIREMENT	
notification shall include the following information, as		
applicable:	Timing: On forming a GSA & with submittal	
 (4) A list of interested parties developed pursuant to Section 10723.2 and an explanation of how their interests will be considered in the development and operation of the groundwater sustainability agency and the development and implementation of the agency's sustainability plan.	of GSP	
10727.8	2. Agencies preparing a GSP must prepare	
 (a) Prior to initiating the development of a groundwater sustainability plan, the groundwater sustainability agency shall make available to the public and the department a written statement describing the manner in which interested parties may participate in the development and implementation of the groundwater sustainability plan. The groundwater sustainability agency shall provide the written statement to the legislative body of any city, county, or city and county located within the geographic area to be covered by the plan. The groundwater sustainability agency may appoint and consult with an advisory committee consisting of interested parties for the purposes of developing and implementing a groundwater sustainability plan. The groundwater sustainability agency shall encourage the active involvement of diverse social, cultural, and economic elements of the population within the groundwater basin prior to and during the development and implementation of the groundwater sustainability plan. If the geographic area to be covered by the plan includes a public water sustainability agency shall encourage the public Utilities Commission, the groundwater sustainability plan. 	 Agencies preparing a GSP must prepare a written statement describing the manner in which interested parties may participate in its development and implementation. Statement must be provided to: a. Legislative body of any city and/or county within the geographic area of the plan Public Utilities Commission if the geographic area includes a regulated public water system regulated by that Commission DWR Interested parties (see Section 10927) The public GSP entities may form an advisory committee for the GSP preparation and implementation. The GSP entities are to encourage active involvement of diverse social, 	
listed in Section 10927 that are monitoring and reporting	cultural and economic elements of the	
groundwater elevations in all or a part of a groundwater basin managed by the groundwater sustainability agency.	affected populations.	
managed by the groundwater sustainability agency.	Timing: On initiating GSP	
10728.4 Public Notice of Proposed Adoption, GSP Adoption Pubic	3. GSP must be adopted or amended at	
Hearing	Public Hearing.	
A groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least	4. Prior to Public Hearing for adoption or amendment of the GSP, the GSP	
90 days after providing notice to a city or county within the area of	entities must:	
the proposed plan or amendment. The groundwater sustainability	a. Notify cities and/or counties of	
agency shall review and consider comments from any city or	geographic area 90 days in	
county that receives notice pursuant to this section and shall	advance.	
consult with a city or county that requests consultation within 30 days of receipt of the notice. Nothing in this section is intended to	b. Consider and review comments	

CODE	PUBLIC OUTREACH REQUIREMENT	
preclude an agency and a city or county from otherwise consulting	c. Conduct consultation within 30	
or commenting regarding the adoption or amendment of a plan.	days of receipt with cities or	
	counties so requesting	
10730 Fees.	Related to GSAs	
	5. Public meeting required prior to	
including, but not limited to, permit fees and fees on	adoption of, or increase to fees. Oral or	
groundwater extraction or other regulated activity, to fund the	written presentations may be made as	
costs of a groundwater sustainability program, including, but not	part of the meeting.	
limited to, preparation, adoption, and amendment of a	6. Public notice shall include:	
groundwater sustainability plan, and investigations, inspections,	a. Time and place of meeting	
compliance assistance, enforcement, and program	b. General explanation of matter to be	
administration, including a prudent reserve. A groundwater	considered	
sustainability agency shall not impose a fee pursuant to this	c. Statement of availability for data	
subdivision on a de minimis extractor unless the agency has	required to initiate or amend such	
regulated the users pursuant to this part. (b) (1) Prior to imposing or increasing a fee, a groundwater	fees	
sustainability agency shall hold at least one public meeting, at	d. Public posting on Agency Website	
which oral or written presentations may be made as part of the	and provision by mail to interested	
meeting.	parties of supporting data (at least	
(2) Notice of the time and place of the meeting shall include a	20 days in advance)	
general explanation of the matter to be considered and a	7. Mailing lists for interested parties are	
statement that the data required by this section is available.	valid for 1 year from date of request and	
The notice shall be provided by publication pursuant to Section	may be renewed by written request of	
6066 of the Government Code, by posting notice on the	the parties on or before April 1 of each	
Internet Web site of the groundwater sustainability agency,	year.	
and by mail to any interested party who files a written request with the agency for mailed notice of the meeting on new or	8. Includes procedural requirements per	
increased fees. A written request for mailed notices shall be	Government Code, Section 6066.	
valid for one year from the date that the request is made and		
may be renewed by making a written request on or before		
April 1 of each year.	Timing: Prior to adopting fees.	
(3) At least 20 days prior to the meeting, the groundwater		
sustainability agency shall make available to the public data		
upon which the proposed fee is based.		
(c) Any action by a groundwater sustainability agency to impose or		
increase a fee shall be taken only by ordinance or resolution.		
(d) (1) As an alternative method for the collection of fees imposed		
pursuant to this section, a groundwater sustainability agency may adopt a resolution requesting collection of the fees in the		
same manner as ordinary municipal ad valorem taxes.		
(2) A resolution described in paragraph (1) shall be adopted and		
furnished to the county auditor-controller and board of		
supervisors on or before August 1 of each year that the		
alternative collection of the fees is being requested. The		
resolution shall include a list of parcels and the amount to be		
collected for each parcel.		
(e) The power granted by this section is in addition to any powers		
a groundwater sustainability agency has under any other law.		

California Government Code

CODE	PUBLIC OUTREACH REQUIREMENT
6060 Whenever any law provides that publication of notice shall be made pursuant to a designated section of this article, such notice shall be published in a newspaper of general circulation for the period prescribed, the number of times, and in the manner provided in that section. As used in this article, "notice" includes official advertising, resolutions, orders, or other matter of any nature whatsoever that are required by law to be published in a newspaper of general circulation.	 Must publish notices in a newspaper of general circulation as prescribed. Publication shall be once a week for two successive weeks. Two publications in a newspaper published once a week or oftener, with at least five days intervening between the respective publication dates not counting such publication dates, are sufficient. The period of notice begins the first day
6066 Publication of notice pursuant to this section shall be once a week for two successive weeks. Two publications in a newspaper published once a week or oftener, with at least five days intervening between the respective publication dates not counting such publication dates, are sufficient. The period of notice commences upon the first day of publication and terminates at the end of the fourteenth day, including therein the first day.	of publication and terminates at the end of the fourteenth day, (which includes the first day.) Timing : <i>Prior to adopting fees</i>

Appendix 2. Communications Governance

Given the relatively large number of stakeholders, a recommendation for coordinated efforts, and the legal requirements for outreach¹³ some form of communications governance is recommended.

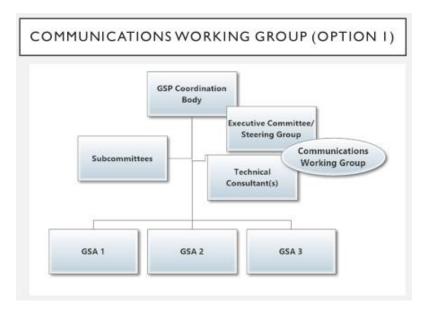
Execution of communications activities can be accomplished by an individual or multiple individuals, and/or include or be solely managed by project consultants. The actual form of the governance is less important than a clear understanding of the roles and responsibilities of those responsible for ensuring required communication. Also essential is a clear chain of command that ensures the elected representatives of GSAs are able to retain communications leadership and guidance.

A driving consideration for establishing a communications governance structure is the level of effort associated with required activities and the fact that communications are highly time dependent. That means that communications activities should be occurring that may happen outside of regularly scheduled GSA meetings. In this case delegation with guidance to a communications team is efficient and effective.

Several governance options for consideration are offered below.

Communications Option 1

Communications Option 1 is based on an overall GSP(s) development structure that includes a GSA member based leadership function that is guiding the Technical Consultants. A communications working group which might include staff, consultants and GSA elected officials, or some combination of those roles could be formed to serve as a communications working group that would ultimately report to the larger GSP coordinating body.

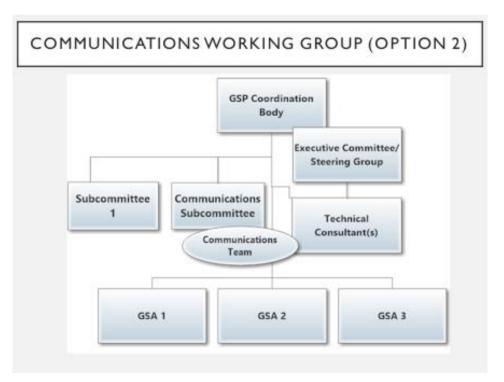


Communications Governance Option 1

Communications Option 2

¹³ See Appendix 1

Communications Option 1 is based on an overall GSP(s) development structure that includes a GSA member based subcommittee guiding the Technical Consultants. A communications working group which might include staff, consultants and GSA elected officials, or some combination of those roles could be formed to serve as a communications team that is affiliated with a subcommittee and would ultimately report to the larger GSP coordinating body



Communications Governance Option 2