

**Telephonic Meeting of the
Delta-Mendota Subbasin Coordination Committee**

Monday, March 8, 2021, 9:30 AM

[Click here to join Zoom meeting](#)

Call-in Number: +1 669-900-6833

Meeting ID: 831 0486 1390

Passcode: 408171

Coordination Committee Members and Alternates Present

Vince Lucchesi – Patterson Irrigation District/Northern Delta-Mendota Region
Walt Ward – Stanislaus County/Northern Delta-Mendota Region (Alternate)
Ben Fenters – San Luis Water District/Central Delta-Mendota Region
Lacey McBride – Merced County/Central Delta-Mendota Region (Alternate)
Jarrett Martin – Central California Irrigation District/SJREC
Alejandro Paolini – San Luis Canal Company/SJREC
Jim Stilwell – Farmers Water District
Augie Ramirez – Fresno County
Ric Ortega – Grassland Water District
Joe Hopkins – Aliso Water District/Provost & Pritchard

San Luis & Delta-Mendota Water Authority Members Present

Scott Petersen
John Brodie
Claire Howard – Provost & Pritchard

Others Present

Ellen Wehr – Grassland Water District
Anthea Hansen – Del Puerto Water District
Larry Harris – Turner Island Water District
Will Halligan – Luhdorff & Scalmanini
Kait Palys Bautista – Provost & Pritchard
Lauren Layne – Baker Manock & Jensen
Leslie Dumas – Woodard & Curran

1. Call to Order/Roll Call

Jarrett Martin/CCID called the meeting to order at 9:32 AM.

2. Committee to Consider Corrections or Additions to the Agenda of Items, as authorized by Government Code Section 54950 et seq.

No corrections or additions were made to the agenda of items.

3. Opportunity for Public Comment

No public comment was shared.

4. Committee to Review and Take Action on Consent Calendar, Howard

- a. Minutes for the February 8, 2021 Telephonic Meeting of the Delta-Mendota Subbasin Coordination Committee
- b. February 2021 Budget to Actual Report

The Committee considered approval of the February 8th meeting minutes and the February 2021 budget to actual report. No comments or questions were shared under this item. Ben Fenters/SLWD provided the motion and Augie Ramirez/Fresno seconded. The Committee voted by roll call; the motion was passed unanimously by those present.

5. Conference with Legal Counsel – Existing Litigation

The Committee will meet in closed session to confer with legal counsel pursuant to Paragraph (1), Subdivision (d) of Government Code Section 54956.9.

California Sportfishing Protection Alliance v. All Persons Interested in the Matter of the Validity of the Northern and Central Delta-Mendota Regions Groundwater Sustainability Plan, et al., Stanislaus County Superior Court, Case No. CV-20-001748 [Delta-Mendota Subbasin SGMA Challenge].

6. Report Out of Closed Session

No reportable action was taken.

7. Committee to Consider Approval of Delta-Mendota Subbasin Water Year 2020 Consolidated Annual Report, Dumas/Brodie

Leslie Dumas/W&C provided an overview of draft Water Year 2020 (WY20) Consolidated Annual Report, and highlighted items that are still being finalized. Kait Palys Bautista/P&P explained that each GSP Group is tasked with developing a written narrative for the Plan Implementation section. The current draft of the WY20 Annual Report has varying detail for each GSP Group's section. Additionally, each GSP Group has the opportunity to share an appendix for inclusion in the Consolidated Annual Report if any GSP is interested in providing additional detail. Some GSP Groups are using the Plan Implementation section or separate appendix to detail monitoring processes, challenges, and changes to the representative monitoring network.

Approval of the WY20 Annual Report will be tabled until a near-final version is available. The Committee members discussed their interest in holding a special meeting March 29th-31st to consider final approval of the WY20 Annual Report prior to the DWR submittal deadline of April 1st. A Doodle poll will be shared to confirm Committee members' availability for this meeting.

8. Committee to Consider Authorization of Execution of the Following Task Orders for Services Included in the Approved Fiscal Year 2022 Coordinated SGMA Budget, Petersen/Brodie

- Woodard & Curran
 - o Proposition 68 grant administration for supplemental GSP development, well census and inventory, and subsidence characterization study (ongoing from Fiscal Year 2021)
 - o Water Year 2021 Consolidated Annual Report (coordinated components and WSE mapping)

- GSI Environmental Inc.
 - o Subbasin-wide subsidence characterization study and project feasibility determination
- Houston Engineering Inc.
 - o Data management system (DMS) hosting, staff support and approved enhancements
- Provost & Pritchard
 - o Staff augmentation support for the Coordination Committee

Scott Petersen/SLDMWA provided an overview of the Fiscal Year 2022 (FY22) task orders for Coordinated SGMA activities that were included within the Coordination Committee's adopted and approved FY22 budget. Scott noted that the practice consistent with previous years is to bring task orders to the Coordination Committee for approval prior to execution. Scott requested input from the Committee regarding the future process for budgetary and task order approval. The Committee suggested that only new contracts and task orders not included in the annual budget should be brought to the Committee for confirmation and approval; contracts for activities included in the approved annual budget do not need to be revisited after the Committee approves the budget. Vince Lucchesi/PID provided the motion for the Committee and Ric Ortega/Grassland seconded. The Committee voted by roll call; the motion passed. Joe Hopkins/P&P abstained from the vote because a Provost & Pritchard contract was included in this set of task orders.

9. **Committee to Discuss Inter-basin Coordination Efforts:**
- a. **Subbasin Representatives' Report from March 3rd Regional Inter-basin Coordination Meeting, Fenters/Lucchesi/Martin**

An introductory meeting for the Delta-Mendota Subbasin's Facilitation Support Services (FSS) inter-basin coordination activities was held March 3rd with representatives from Madera, Merced, Chowchilla, and Delta-Mendota Subbasins in attendance. Vince Lucchesi/PID noted that the Delta-Mendota Subbasin representatives were interested in focusing the meeting on topics such as subsidence and river monitoring. Future meetings will aim to focus on specific topics of shared interest for the various subbasin representatives. Ben Fenters/SLWD suggested holding a pre-meeting with the participating Delta-Mendota Subbasin representatives to coordinate their approach during the meeting and clarify their shared positions in topics.

- b. **Coordination for San Joaquin River Interconnected Surface Water (ISW) Monitoring Network, Dumas/Brodie**

Leslie Dumas/W&C explained that the Northern and Central Regions don't have an ISW monitoring network, but aim to identify and develop this network prior to the 2025 GSP update. Leslie has recently discussed this topic with the consultant team representing Modesto and Turlock Subbasins, which are both developing GSPs for the 2022 submission. As of this meeting, these subbasins don't have plans in place to establish monitoring networks along the San Joaquin River. Modesto and Turlock Subbasins are currently more focused on impacts to the Tuolumne and Modesto Rivers because of anticipated pumping and diversions.

Leslie emphasized the importance of coordinating monitoring efforts along both sides of the San Joaquin River, and at a minimum demonstrating outreach to the Modesto and Turlock Subbasins even if no significant progress is made prior to the 2025 GSP Update. Leslie also suggested that this topic be revisited once more progress is made on the Northern and Central Regions' well census and inventory project to identify potential sites for inclusion in the ISW network. This

topic will be included in future Coordination Committee meeting agendas to maintain emphasis on coordination and development within the Delta-Mendota Subbasin and with other subbasins.

10. GSP Group Representatives to Share Update on Well Census and Inventory Projects, Howard/GSP Group Representatives

Committee members shared progress on each GSP Group's well census and inventory project efforts to date:

- Northern & Central Region GSP Group: Claire Howard/P&P shared that data is being compiled for the Northern and Central Regions' project from each GSA, publicly accessible data, and additional information from past projects. Preliminary maps are anticipated in the coming weeks that each GSA will review for completeness. Ben Fenters/SLWD noted that additional data for the Central Delta-Mendota GSA is being incorporated from that GSA's well registration efforts.
- Jarrett Martin/CCID explained that the SJREC GSP Group submitted for project close-out. The SJREC GSP Group focused on locating missing lower aquifer sites.
- Ric Ortega/Grassland shared that the Grassland GSP Group is focused on mapping and identifying wells within their area.
- Will Halligan/LSCE explained that the Farmers WD GSP Group's effort is almost complete, and includes the addition of the recent TSS well installed in Farmers WD's area.
- Will also shared that the Fresno GSP Group is updating the well inventory for the Mendota Pool Group as part of their efforts.
- The Aliso GSP Group is updating their well registry and perforation information for their well census project.

Additional project detail and updates will be requested in future Coordination Committee meetings and information from each GSP Group will be collected for reimbursement submission as part of the Subbasin's reporting process for the Proposition 68 Sustainable Groundwater Management (SGM) grant.

11. Committee to Discuss Subbasin Subsidence Characterization Study and Project Feasibility Determination Kickoff Meeting, Brodie

John Brodie/SLDMWA shared that a kickoff meeting for the Subbasin's subsidence project will be scheduled this month. This will be an opportunity for Coordination Committee and Subbasin Technical Working Group members to meet with the GSI Environmental Inc. team and discuss available data and project approaches for the Subbasin's study.

12. Committee to Discuss Optional DMS Enhancements, Brodie

John Brodie/SLDMWA reviewed optional enhancements for the Subbasin's data management system (DMS). These enhancements were suggested by various GSP Groups while using the DMS for Annual Report preparation and during the data upload process. The Northern and Central Management Committees recently reviewed these optional enhancements and requested input from the Coordination Committee prior to authorizing approval of any. John and Leslie Dumas/W&C shared that these enhancements are not covered within the approved FY22 budget, but these could be covered by reimbursements through the Proposition 1/68 grant under the Technical Assistance category. Leslie explained that several of these enhancements have been requested to improve the use of the DMS alongside the DWR SGMA Portal for uploading

monitoring data. The DWR templates for uploading monitoring data were finalized after the DMS, so these proposed enhancements would make the DMS more consistent with DWR Portal.

13. Committee to Discuss Monitoring Activities and Reporting Responsibilities for Spring 2021, Howard

14. Reminder Regarding 2021 Coordination Committee Meeting Schedule, Howard

Claire Howard/P&P reminded the Coordination Committee that regular meetings in 2021 will be held quarterly on the second Monday of each month. The next meetings will be in June, September, and December. Special meetings will still be scheduled and noticed as needed.

15. Next Steps

- Leslie Dumas/W&C will provide a follow-up email to confirm outstanding components of the WY20 Annual Report.
- A special Coordination Committee meeting will be scheduled March 29th-31st to get final approval of the Water Year 2020 Consolidated Annual Report prior to submittal to DWR by the April 1st deadline.
- A pre-meeting will be held prior to future inter-basin coordination meetings to discuss the Delta-Mendota Subbasin representatives' approaches and positions on relevant topics
- A kickoff meeting for the Subbasin's subsidence characterization study will be scheduled this month with the GSI Environmental Inc. team.
- The seasonal high water level monitoring period closes at the end of April. The data for representative monitoring sites must be uploaded to the DWR SGMA Portal along with the sustainable management criteria for these sites.

16. Reports Pursuant to Government Code Section 54954.2(a)(3)

Leslie Dumas/W&C noted that she requested scoring criteria from DWR for the Subbasin's recent application for the Proposition 68 Implementation grant program and will relay updates to the participating representatives for next steps.

17. ADJOURNMENT

Jarrett Martin/CCID adjourned the meeting at 10:56 AM.

**Special Telephonic Meeting of the
Delta-Mendota Subbasin Coordination Committee**

Monday, March 29, 2021, 10:00 AM

Click here to join Zoom meeting
Call-in Number: +1 669-900-6833
Meeting ID: 830 8917 8596
Passcode: 810021

Coordination Committee Members and Alternates Present

Vince Lucchesi – Patterson Irrigation District/Northern Delta-Mendota Region
Ben Fenters – San Luis Water District/Central Delta-Mendota Region
Alejandro Paolini – San Luis Canal Company/SJREC
Jim Stilwell – Farmers Water District
Ric Ortega – Grassland Water District
Ken Swanson – Grassland Water District (Alternate)
Joe Hopkins – Aliso Water District/Provost & Pritchard

San Luis & Delta-Mendota Water Authority Members Present

Scott Petersen
John Brodie
Claire Howard – Provost & Pritchard

Others Present

Ellen Wehr – Grassland Water District
Shawn Carmo – Grassland Water District
Larry Harris – Turner Island Water District
Will Halligan – Luhdorff & Scalmanini
Kait Palys Bautista – Provost & Pritchard
Rick Iger – Provost & Pritchard
Leslie Dumas – Woodard & Curran
Natalie Cochran – Woodard & Curran
Chris Rogers – Central California Irrigation District
Kyle Hill – Central California Irrigation District

1. Call to Order/Roll Call

Alejandro Paolini/SLCC called the meeting to order at 10:03 AM.

2. Committee to Consider Corrections to the Agenda of Items, as authorized by Government Code Section 54950 et seq.

No corrections were made to the agenda of items.

3. Opportunity for Public Comment

Ben Fenters/SLWD noted that this was his final SGMA meeting representing San Luis Water District.

4. Committee to Consider Approval of Delta-Mendota Subbasin Water Year 2020 Consolidated Annual Report, Dumas

Leslie Dumas/W&C provided an overview of the latest draft of the Water Year 2020 Consolidated Annual Report. Leslie highlighted the hydrographs and maps depicting change in storage values. Ric Ortega/Grassland requested clarification on Grassland GSP Group's change in storage value. The Committee considered approval of the Annual Report pending approval of the Grassland change in storage value for the lower aquifer. Joe Hopkins/Aliso provided the motion for the Committee and Ric Ortega seconded. The Committee voted by roll call; the motion was passed unanimously by those present. The Annual Report will be submitted to the DWR SGMA Portal by the April 1st deadline following confirmation of the Grassland change in storage value.

5. Committee to Discuss Upcoming Inter-basin Coordination Meetings and Confirmation of Participants, Howard

Claire Howard/P&P explained that more inter-basin coordination meetings are anticipated to be scheduled this spring and early summer as part of the Subbasin's Facilitation Support Services (FSS) program with DWR. The FSS-supported inter-basin meetings will be with representatives from the Chowchilla, Madera, and Merced Subbasins. Claire explained that the Stantec team leading the meetings requested contact information for representatives from each subbasin interested in attending as participants (up to three) as well as listeners (up to five) for future meetings.

Jarrett Martin/CCID, Vince Lucchesi/PID, and Ben Fenters/SLWD were previously confirmed as meeting participants on behalf of the Delta-Mendota Subbasin. Augie Ramirez/Fresno, Will Halligan/LSCE, Rick Iger/P&P, and Leslie Dumas/W&C all expressed interest in attending future FSS meetings as listeners. Walt Ward/Stanislaus and John Wiersma/SLCC also previously shared their interest in attending as listeners. John Brodie/SLDMWA confirmed that he will share the list of interested participants with the Stantec team.

Leslie Dumas/W&C also shared that she is scheduling meetings with representatives from the Turlock and Modesto Subbasins to discuss developing coordinated interconnected surface water (ISW) networks on both sides of the San Joaquin River. Leslie noted that she will include Jarrett Martin/CCID and Ric Ortega/Grassland when scheduling these meetings.

6. Committee to Discuss Subbasin Monitoring and Reporting, Howard

Claire Howard/P&P reminded the Committee that the Subbasin's seasonal high water level monitoring period closes April 30th. Water level readings must be collected at all representative water level monitoring sites by this date. These readings must be uploaded to DWR's SGMA Monitoring Network Module (MNM) by July 1. This year, the MNM also accepts sustainable management criteria (SMC) data for representative water level sites. SMC data must be uploaded for all sites before the seasonal high water level readings are uploaded.

7. Committee to Discuss California's Groundwater (Bulletin 118) Update and Public Comment Period, Howard

Claire Howard/P&P and Leslie Dumas/W&C noted that the public comment period is currently open for the latest update to California's Groundwater (Bulletin 118). This version provides an overview of water use at the hydrologic regions throughout the State, and future updates will provide detail at the subbasin-level.

8. Next Steps

- The Committee approved the Water Year 2020 Consolidated Annual Report pending confirmation of Grassland's change in storage value. The Annual Report will be submitted to DWR by the April 1st deadline.
- SLDMWA staff will provide contact information to the Stantec facilitation team for representatives interested in attending future FSS inter-basin coordination meetings as listeners.
- Leslie Dumas will schedule meetings with Turlock and Modesto Subbasin representatives to discuss establishing a coordinated ISW monitoring network along the San Joaquin River.
- The Subbasin's seasonal high water level monitoring period closes April 30th. All representative water level monitoring sites must be sampled by that date; these data must be uploaded to the SGMA MNM by July 1 along with SMC data.

9. **Reports Pursuant to Government Code Section 54954.2(a)(3)**

No topics were discussed under this item.

10. **ADJOURNMENT**

Alejandro Paolini/SLCC adjourned the meeting at 10:30 AM.

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2021 - FEBRUARY 28, 2022
SGMA ACTIVITIES - COORDINATED COST-SHARE AGREEMENT
ACTIVITY AGREEMENTS BUDGET TO ACTUAL
COORDINATED (FUND 63)

Report Period 3/1/21 - 4/30/21
CC 6/14/21

EXPENDITURES	Annual Budget	Paid/ Pending	Additional Pending	Total Expenses	Amount Remaining	% of Amt Remaining	Expenses Through
<u>Legal:</u>							
Outside Counsel	\$ 4,000	\$ -	\$ -	\$ -	\$ 4,000	100%	
<u>Other Professional Services:</u>							
GSP Implementation Contracts							
Coordinated Annual Reports Activities (Common Chapter, Water Level Contouring)	\$ 10,500	\$ -	\$ -	\$ -	\$ 10,500	100%	
DMS Hosting, Augmentation and Support	\$ 14,943	\$ -	\$ -	\$ -	\$ 14,943	100%	
Staff Augmentation Support (Provost & Pritchard)	\$ 19,941	\$ -	\$ -	\$ -	\$ 19,941	100%	
Proposition 68 (Grant Administration)							
Component 1 (Grant Administration)	\$ 30,000	\$ -	\$ -	\$ -	\$ 30,000	100%	
Component 2 (Technical Assistance)	\$ 45,000	\$ -	\$ -	\$ -	\$ 45,000	100%	
Component 11 (Subsidence Characterization)	\$ 85,000	\$ -	\$ -	\$ -	\$ 85,000	100%	
<u>Other:</u>							
Executive Director	\$ 1,980	\$ -	\$ -	\$ -	\$ 1,980	100%	
General Counsel	\$ 3,116	\$ -	\$ -	\$ -	\$ 3,116	100%	
Water Policy Director	\$ 2,955	\$ -	\$ -	\$ -	\$ 2,955	100%	
Water Resources Program Manager	\$ 34,571	\$ 1,410	\$ -	\$ 1,410	\$ 33,161	96%	4/30/21
Accounting	\$ 3,690	\$ -	\$ -	\$ -	\$ 3,690	100%	
Los Banos Administrative Office (LBAO)	\$ 500	\$ -	\$ -	\$ -	\$ 500	100%	
Travel/Mileage	\$ 2,000	\$ -	\$ -	\$ -	\$ 2,000	100%	
Group Meetings	\$ 1,000	\$ -	\$ -	\$ -	\$ 1,000	100%	
Telephone	\$ 500	\$ -	\$ -	\$ -	\$ 500	100%	
Equipment and Tools	\$ 1,000	\$ -	\$ -	\$ -	\$ 1,000	100%	
Total Expenditures	\$ 260,696	\$ 1,410	\$ -	\$ 1,410	\$ 259,286	99%	



MEMORANDUM

TO: Delta-Mendota Subbasin Coordination Committee Members and Alternates

FROM: John Brodie, Water Resources Program Manager

DATE: June 14, 2021

RE: Optional Enhancements for Delta-Mendota Subbasin Data Management System

BACKGROUND

The Delta-Mendota Subbasin's (Subbasin) data management system (DMS) was developed by Houston Engineering, Inc. (HEI) during the development of the Subbasin's six coordinated groundwater sustainability plans (GSPs). HEI continues to provide hosting and support services for the ongoing use of the DMS. The Subbasin's GSP Groups utilize the DMS to store monitoring data and summarize reporting data that are incorporated to the Annual Report submitted to the California Department of Water Resources (DWR) by April 1st each year. Through the use of the DMS for Water Year 2019 and Water Year 2020 monitoring data uploading and Annual Report preparation, several modifications and enhancements were suggested to further refine the DMS structure and improve its functionality.

Several enhancements were incorporated into the previously approved and executed Fiscal Year 2022 Task Order with HEI (FY22-001-HEI). These approved enhancements include: A) allowing a configurable date range for importing data, B) auto-generating cumulative change in storage graphs, C) allowing authorized GSP representatives to download their respective GSP reports, and D) incorporating data visualization to support quality control.

Additional optional enhancements were discussed at Northern and Central Delta-Mendota Region Management Committees (Management Committees) and Delta-Mendota Subbasin Coordination Committee (Coordination Committee) meetings. The Management Committees considered approval of these proposed optional enhancements during the May 27, 2021 meeting and recommended the GSP Group representatives to provide this approval at the Coordination Committee meeting.

Detail for the suggested optional enhancements are included in the table below:

Optional Task	Sr. GIS Project Manager (\$190)	Software Engineer (\$129)	Total Fee
4A – Configurable Water Year	0	4	\$516.00
4B – Convert Water Level Data to DWR Template	1.5	9	\$1,446.00
4C – Convert Extraction and Use Data to DWR Template	2	9	\$1,541.00
4D – Create Water Level Pop-up Hydrographs	1	10	\$1,480.00
Total Optional Tasks	4.5	32	\$4,983.00

ISSUE FOR DECISION

Whether the Coordination Committee should authorize approval of the outlined optional DMS enhancements.

RECOMMENDATION

SLDMWA staff recommend approval of the optional enhancements, which will improve ease of use for the DMS and reporting requirements for all GSP Groups. Staff also recommend coordinating with Department of Water Resources (DWR) staff regarding eligibility of these costs for reimbursement under the Subbasin's Proposition 1/68 Sustainable Groundwater Management (SGM) grant.

ANALYSIS

The discussed enhancements will improve functionality of the DMS for use by all GSP Groups when compiling and reporting monitoring data to the DMS and to DWR's SGMA Portal, as well as for preparing Annual Reports.

BUDGET

The \$4,983 total for the optional DMS enhancements were not included in the adopted Fiscal Year 2022 budget. Component 2 of the Subbasin's Proposition 1/68 SGM grant, Technical Assistance Services, has remaining funding available to support stakeholder engagement and technical assistance activities. The optional DMS enhancements can be covered by remaining technical assistance activities funds within Component 2. SLDMWA staff and the Woodard & Curran grant administration team will confirm this process with DWR staff and provide any additional information as needed.

CONSIDERATION OF APPROACH TO ADDRESS PRESSURES TO INCREASE GROUNDWATER PUMPING IN THE DELTA-MENDOTA SUBBASIN

NORTHERN & CENTRAL DELTA-MENDOTA MANAGEMENT COMMITTEES

27 May 2021

BACKGROUND

- The Delta-Mendota Subbasin has been designated by DWR as being critically overdrafted.
- Successful SGMA implementation relies on a system of mutual accountability (i.e., basins “pass” or “fail” as a whole).
- GSPs (and GSAs) will be judged as to whether “...the Plan [and its implementation] will adversely affect the ability of an adjacent basin [GSA] to implement its Plan or impede achievement of its sustainability goal.” [CCR § 355.4 (b)(7)]
- The NCDM GSP makes clear that it is “the responsibility of each GSA in the Subbasin to manage Lower Aquifer pumping to prevent significant and unreasonable subsidence*” [Page 5-238] and presumably to avoid other Undesirable Results.

* NCDM GSP, Page 5-527: Lower Aquifer groundwater extractions has been identified as one of the key causes of inelastic land subsidence in the Delta-Mendota Subbasin. The City of Patterson... relies solely on groundwater from the Lower Aquifer for potable supply. The City of Patterson is located directly east of the DMC within Pool 7, where subsidence occurred at a rate of 0.22 feet/year during the most recent drought (2014- 2016) and decreased to 0.06 feet/year immediately following the drought (2016-2018); thus reinforcing the connection between Lower Aquifer groundwater pumping and inelastic subsidence.

HOW MUCH PUMPING IS SUSTAINABLE?

- The “Sustainable Yield” of the Delta-Mendota Subbasin was estimated* to be 0.33 AFY/ac, although the NCDM GSP acknowledged that “Sustainable yield is not uniform throughout the Subbasin” [Page 5-238].
 - The portion of the Sustainable Yield that is derived from “Native Yield” versus the portion that is derived from active surface water importation and/or management has not been clarified and has important implications with respect to water rights and on-going sustainable management.
 - Each GSA is not currently working within a specific water budget or “allocation” of the Sustainable Yield.
 - GSAs have not uniformly established Lower Aquifer Pumping Rules (a management action per the NCDM GSP) [Page 7-3]
- SGMA compliance is based on meeting Sustainable Management Criteria (SMCs); however, in some cases the SMCs have not even been defined (e.g., ICSW).

* The Sustainable Yield for the Lower Aquifer is estimated based on modeling conducted for the Westlands Water District (WWD) GSA as part of the adjacent Westside Subbasin GSP development [NCDM GSP Page 5-238].

PRESSURES TO INCREASE GROUNDWATER PUMPING ARE A CHALLENGE FOR SGMA IMPLEMENTATION

- Applications for new well permits have initiated a process in the N-C Region by which the Counties and GSAs are coordinating to develop a process for permitting the installation of new wells.
- Environmental review of a significant new mixed-use development project in the City of Patterson similarly invites the question:

What role, if any, should the N-C Region GSAs have in the review and approval of new projects that will increase groundwater demand within the Subbasin?

OPTIONS FOR COMMITTEES' CONSIDERATION

1. Status Quo (i.e., GSAs individually comment if they have concern with the proposed project, well permit, etc.).
2. Invest in development of a framework that will provide clarity to GSAs that are conducting local decision making (e.g., supporting new well permitting or Water Supply Assessments) and ensure that their actions do not impact another GSA or implementation of the Plan:
 - a) Develop criteria that a proposed project / GSA can use to demonstrate that is in compliance with the NCDM GSP and will not create local or regional SMC exceedances or Undesirable Results;
 - b) Develop refined, GSA-specific Sustainable Yield estimates;
 - c) Develop GSA-specific Water Budgets;
 - d) Assign groundwater pumping allocations at the GSA level;
 - e) Other?

3 Condition project approval on collective GSA approval or mitigation requirements.