Telephonic Meeting of the Delta-Mendota Subbasin Coordination Committee

Monday, June 14, 2021, 9:30 AM

Click here to join meeting
Call-in Number: +1 669-900-6833
Meeting ID: 864 7092 0323
Passcode: 925174

Coordination Committee Members and Alternates Present

Vince Lucchesi – Patterson Irrigation District/Northern 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
Augie Ramirez – Fresno County
Ric Ortega – Grassland Water District
Ken Swanson – Grassland Water District (Alternate)
Ross Franson – Aliso Water District (Alternate)

San Luis & Delta-Mendota Water Authority Members Present

John Brodie
Lauren Neves
Claire Howard – Provost & Pritchard

Others Present

Lauren Layne – Baker Manock & Jensen
Anthea Hansen – Del Puerto Water District
Kel Mitchell – Turner Island Water District
Will Halligan – Luhdorff & Scalmanini
Katie Durham – Provost & Pritchard
Steve Stadler – San Luis Water District
Ben Fenters – Central California Irrigation District
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**
        i. **March 8, 2021 Telephonic Meeting of the Delta-Mendota Subbasin Coordination Committee**
        ii. **March 29, 2021 Special Telephonic Meeting of the Delta-Mendota Subbasin Coordination Committee**
    b. **Budget**
        i. **April 2021 Budget to Actual Report**
        ii. **Water Year 2020 Annual Report Budget/Expenses, Brodie**

The Committee considered approval of the Consent Calendar as presented. Ric Ortega/Grassland provided the motion and Vince Lucchesi/PID seconded. The Committee voted by roll call; the motion was passed unanimously by those present.

John Brodie/SLDMWA provided an informational update on the Water Year 2020 Annual Report budget. John noted that Woodard & Curran agreed to write off charges from the postmortem analysis of the Water Year 2020 Annual Report development, which was originally charged to the Coordination Committee in a recent invoice.

5. **Committee to Consider Approval of Optional Enhancements for the Delta-Mendota Subbasin Data Management System, Brodie**

John Brodie/SLDMWA provided an overview of the proposed enhancements for the Subbasin's data management system (DMS). These enhancements were requested by GSA and GSP Group representatives based on use of the DMS to date for uploading monitoring data and preparing the Water Year 2019 and 2020 Annual Reports. These enhancements include:

- Allowing users to configure the Water Year within the DMS
- Converting water level data in the DMS to DWR's template to aide uploading
- Converting extraction and water use data to DWR's template to aide uploading
- Creating water level pop-up hydrographs for viewers to more easily track water level trends

The Committee considered approval of these enhancements as presented. Ric Ortega/Grassland provided the motion and Vince Lucchesi/PID seconded. The Committee voted by roll call; the motion was approved unanimously by those present.

6. **Committee to Discuss Implementation Efforts, Brodie**
    a. **Monitoring Activities and Reporting Responsibilities, Howard**

The Committee discussed timelines for upcoming monitoring activities and reporting. Seasonal high water level data collected between February 1 – April 30 for the Subbasin's representative monitoring sites must be uploaded to the DWR SGMA Portal by July 1st. Sustainable management criteria (SMC) data are also required for representative water level monitoring sites by this date.

The Subbasin's water quality monitoring window started May 1st and ends August 31st. Groundwater quality samples must be collected at representative sites during this time period. These water level and water quality data must also be uploaded to the Subbasin's DMS, and will be incorporated into the next Annual Report. SLDMWA staff will continue to support coordination between GSP Group and DWR staff for finalizing data uploaded to the SGMA Portal.

b. **Well Permitting Discussions, Howard**

The Committee discussed well permitting processes, and noted that representatives from the Northern and Central Management Committees have continued to discuss well permitting processes within Stanislaus, Merced, and Fresno Counties. County representatives have relayed updates regarding potential or upcoming changes to their permitting and approval processes, and how this may affect GSAs.

The group noted the challenge of this process given that each County has a different procedure in place and is considering different timelines and/or potential changes moving forward. Many GSAs and GSP Groups within the Delta-Mendota Subbasin span more than one county, which adds need for greater coordination between GSA, GSP Group, and County staff for future well applications. The Committee also noted that the current dry year will likely bring urgency to this process.

c. **GSP Implementation Activities and Evaluation, Brodie**

John Brodie/SLDMWA introduced a discussion topic on GSP implementation activities within the Subbasin. John explained that this was first discussed at a recent Northern and Central Management Committees meeting. The Management Committee members reviewed potential opportunities to consider evaluating new groundwater uses within the Northern and Central Regions, and how these uses may impact the GSP's successful implementation.

The Coordination Committee discussed the current uncertainty of GSP implementation given that DWR hasn't released assessments of the Subbasin's six GSPs yet. Without this input, the Committee discussed the challenge of reviewing proposed projects and how new groundwater uses may affect implementation activities and DWR assessment. The Committee discussed potential pros and cons of reaching out to DWR for additional input on the GSP assessment process and timing for the Delta-Mendota Subbasin. Committee members shared general favor for seeking input on assessment timing from DWR rather than requesting detail on the GSP content that DWR may address.

7. **Committee to Discuss Special Projects, Brodie**

a. **Well Census and Inventory Projects, GSP Group Representatives**

GSP Group representatives shared updates on their well census and inventory efforts. Most GSP Groups have completed the bulk of their efforts and will wrap up their projects soon. The Northern and Central Regions' well census efforts are ongoing and include agency review of preliminary maps and ground-truthing. The Grassland GSP Group has compiled available well location and construction information and is also ground-truthing sites.

b. **Subbasin Subsidence Characterization Study, Brodie**

John Brodie/SLDMWA shared that the Subbasin's subsidence characterization study is moving forward. The GSI Environmental, Inc. (GSI) team has requested data additional data to support the study. John noted that the contract with GSI provides assurances of confidentiality for any data shared for this project.

8. **Committee to Discuss Inter-basin Coordination Efforts, Brodie**

a. **Facilitation Support Services (FSS) Inter-basin Coordination Meeting, Brodie/Lucchesi/Martin**

Jarrett Martin/SLDMWA and Vince Lucchesi/PID shared a recap of recent inter-basin coordination meetings. These meetings have been facilitated by a team from Stantec and have included representatives from the Chowchilla, Madera, and Merced Subbasins. Recent meetings have focused on regional subsidence, with a focus on developing a shared understanding of a regional subsidence prioritization area and potential causes. Jarrett and Vince also noted that the group has highlighted SJREC's past success coordinating and addressing subsidence in the Red Top area.

b. Review of Draft Tracy Subbasin GSP Chapters and Opportunity for Public Comment, Howard

Claire Howard/P&P explained that draft chapters were recently released for the Tracy Subbasin GSP and are currently open for public comment. Claire noted that the Tracy Subbasin borders the far north end of the Northern & Central GSP area, particularly the DM-II and WSID GSAs. Claire reminded the Committee that past coordinated comment letters were posted to the DWR SGMA Portal on final GSPs submitted for the January 2020 deadline. Claire noted that if interested, the Committee can consider developing coordinated comment letters on the Tracy Subbasin GSP and other neighboring subbasins' GSPs once final versions are submitted to the SGMA Portal after the January 2022 deadline.

9. Next Steps

- The Committee discussed their interest in including an in-person option in future meetings for interested Coordination Committee members and key personnel. An online Zoom option will remain available for any additional staff, consultants, and members of the public.
- The Committee approved the optional DMS enhancements. SLDMWA staff will coordinate with Houston Engineering, Inc. to implement these in the DMS.
- Seasonal high water level data for representative monitoring sites and associated SMC data are due to the DWR SGMA Portal by July 1st.
- The Subbasin's water quality monitoring window for representative sites started May 1st and will close at the end of August.
- Subbasin representatives will continue to participate in inter-basin coordination meetings with representatives from the Chowchilla, Madera, and Merced Subbasins to discuss regional subsidence evaluation.

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

John Brodie/SLDMWA requested that Committee members update SLDMWA's Opti database with project descriptions and data. Updating project information in Opti will help prepare the Subbasin for upcoming grant application development.

Jarrett Martin/CCID noted updates from neighboring subbasins, including an allocation recently adopted by the Madera Subbasin and an extraction ramp-down effort in the Westside Subbasin.

11. ADJOURNMENT

Jarrett Martin/CCID adjourned the meeting at 10:38 AM.

Special Joint Telephonic Meeting of the Delta-Mendota Subbasin Technical Working Group and Coordination Committee

Modeling Support for the Sustainable Groundwater Management Act (SGMA) in The San Joaquin Valley

Wednesday, August 11, 2021, 12:00 Noon

Click here to join Zoom meeting
Call-in number: 1-669-900-6833
Meeting ID: 869 1166 4175
Passcode: 160995

Coordination Committee Members and Alternates Present

Vince Lucchesi – Patterson Irrigation District/Northern Delta-Mendota Region
Walt Ward – Stanislaus County/Northern Delta-Mendota Region (Alternate)
Jarrett Martin – Central California Irrigation District/SJREC
Ric Ortega – Grassland Water District
Ken Swanson – Grassland Water District (Alternate)
Joe Hopkins – Provost & Pritchard/Aliso Water District

San Luis & Delta-Mendota Water Authority Members Present

John Brodie
Claire Howard – Provost & Pritchard

Others Present

Kirk Nelson – USBR
Jobaid Kabir – USBR
Claudia Faunt – USGS
Jonathan Traum – USGS
Anthea Hansen – Del Puerto Water District
Adam Scheuber – Del Puerto Water District
Kyle Hill – Central California Irrigation District
Chris Rogers – Central California Irrigation District
Will Halligan – Luhdorff & Scalmanini Consulting Engineers
Rick Iger – Provost & Pritchard
Steve Stadler – San Luis Water District
Leslie Dumas – Woodard & Curran
Reza Namvar – Woodard & Curran
Anona Dutton – EKI Environment & Water
John Fio – EKI Environment & Water
Kiti Campbell – Westlands Water District

1. Call to Order/Introductions

Jarrett Martin/CCID called the meeting to order at 12:02 PM.

2. **Technical Working Group 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**

No public comment was shared.

4. **CVHM2-SJB Model (Brodie, Nelson)**
   a. **Introduction and Background**
   b. **Potential Applicability for Assisting SGMA Implementation**
   c. **Benefits and Challenges of the Model**

John Brodie/SLDMWA kicked off the discussion and introduced Kirk Nelson/USBR. Kirk provided an overview of the development of the CVHM2-SJB model, which he explained is a subsection of the entire CVHM2 model without the Sacramento and Tulare Basin data. The CVHM model was updated to CVHM2 with additional data, updated code, and time series input to provide greater detail on water level and subsidence projects. The CVHM2-SJB model has been calibrated to match long-term regional subsidence patterns. Kirk explained that CVHM2-SJB is nearing final completion and public release.

The group discussed the need for greater surface water diversion and water reuse data and ensuring consistency of data within the model. Ric Ortega/Grassland highlighted past challenges with diversion and reuse data accuracy from the GSP development process. Ric shared that groundwater demand estimates for the GSP were derived using crop coefficients and crop evapotranspiration data along with surface water deliveries and precipitation data. Ric emphasized his interest in learning more about the datasets incorporated into the CVHM2-SJB model, since some raw datasets that had been considered for GSP development were found to have significantly inaccurate results. The group will reconvene to review the data compiled to data before additional data is shared.

5. **Questions/comments from Coordination Committee/TWG Members**

Most questions and comments focused on data sources and ensuring consistency within the model. These notes are included in the summary of item 4.

6. **Action Items/Next Steps**
   - The USGS/USBR team will compile data sources incorporated into the CVHM2-SJB model for the Coordination Committee/Technical Working Group members' review.
   - A follow-up meeting will be scheduled to further discuss surface water diversion and in-house data.

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

No topics were discussed under this item.

8. **ADJOURNMENT**

Jarrett Martin/CCID adjourned the meeting at 1:08 PM.

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 - 7/31/21

Coordination Committee Meeting 09/09/21

EXPENDITURES	Annual Budget	Paid/ Pending	Additional Pending	Total Expenses	Amount Remaining	% of Amt Remaining	Expenses Through
Legal:							
Outside Counsel	$ 4,000	$ -	$ -	$ -	$ 4,000	100%	
Other Professional Services:							
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 Characterizatio	$ 85,000	$ 13,343	$ -	$ 13,343	$ 71,658	84%	7/31/21
Other:							
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	$ 9,753	$ -	$ 9,753	$ 24,818	72%	7/31/21
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	$ 23,096	$ -	$ 23,096	$ 237,600	91%	

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

EXPENDITURES

Direct Expenditures:

Legal:		
Baker Manock & Jensen	$	4,000
Other Professional Services:		
GSP Implementation Contracts		
Coordinated Annual Report Activites		
(Common Chapter, Water Level Contouring)	$	10,500
DMS Hosting, Augmentation and Support	$	14,943
Staff Augmentation Support (Provost & Pritchard)	$	19,941
Proposition 68 Grant Administration)		
Component 1 (Grant Administration)	$	30,000
Component 2 (Technical Assistance)	$	45,000
Component 11 (Subsidence Characterization)	$	85,000
Other:		
Executive Director	$	1,980
General Counsel	$	3,116
Water Policy Director	$	2,955
Water Resources Program Manager	$	34,571
Accounting	$	3,690
Los Banos Administrative Office (LBAO)	$	500
Travel/Mileage	$	2,000
Group Meetings	$	1,000
Telephone	$	500
Equipment and Tools	$	1,000
Total Expenditures	**$**	**260,696**

REVENUES

Fund Balance	$	-
Membership Dues	$	260,696
Total Revenues	**$**	**260,696**

FUND BALANCE:

End of FY 21 (Estimated)	$	-
End of FY 22 (Estimated)	$	-
Available/(Required)	**$**	**-**

PRIOR YEAR:	**FY19**	**FY20**	**FY21**	**FY22**
BUDGET	**$ -**	**$ -**	**$ -**	**$ 260,696**
MEMBERSHIP DUES	**$ -**	**$ -**	**$ -**	**$ 260,696**

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2021 - FEBRUARY 28, 2022
SGMA ACTIVITIES - COORDINATED COST-SHARE AGREEMENT

DIVISION 1	Total Acres	Central DM Multi Agency GSA Acres	%	Total SGMA Coordinated	Other Professional Services	% of Contribution	Authority & Legal
				$ 100,695	$ 45,384		$ 55,311
1. Banta-Carbona ID			0.00000%	$ -	$ -	0.00%	$ -
2. City of Tracy			0.00000%	$ -	$ -	0.00%	$ -
3. Del Puerto Water District (DPWD 52,570 ac + Oak Flat 4,503 ac)	57,073	0	1.66642%	$ 1,678	$ 756	1.67%	$ 922
3A. Del Puerto (92% of DPWD GSA Cost)			*0.00000%*	*$ 1,544*			
3B. Oak Flat (8% of DPWD GSA Cost)			*0.00000%*	*$ 134*			
4. Patterson Irrigation District (PID 13,067 ac + Twin Oaks 2,629 ac)	15,696	0	1.66642%	$ 1,678	$ 756	1.67%	$ 922
5. Byron Bethany Irrigation District (2020 absorbed West Side ID)			0.00000%	$ -		0.00%	
6. West Side Irrigation District			0.00000%	$ -	$ -	0.00%	$ -
7. West Stanislaus ID (WSID 21,299 ac + Grayson/Westley 246 ac)	21,545	0	1.66642%	$ 1,678	$ 756	1.67%	$ 922
Total Division 1	**94,314**	**0**	**4.99926%**	**$ 5,034**	**$ 2,269**		**$ 2,766**
DIVISION 2							
1. Panoche Water District	38,317	38,317	0.69418%	$ 699	$ 315	0.69%	$ 384
2. San Luis Water District	55,316	55,316	0.69418%	$ 699	$ 315	0.69%	$ 384
3. Westlands Water District (1)			0.00000%	$ -	$ -	0.00%	$ -
4. Charleston Drainage District			0.00000%	$ -	$ -	0.00%	$ -
5. Panoche Drainage District			0.00000%	$ -	$ -	0.00%	$ -
6. Pleasant Valley			0.00000%	$ -	$ -	0.00%	$ -
Total Division 2	**93,633**	**93,633**	1.38835%	**$ 1,398**	**$ 630**		**$ 768**
DIVISION 3							
1. Central California Irrigation District			0.00000%	$ -	$ -	0.00%	$ -
2. Firebaugh Canal Water District			0.00000%	$ -	$ -	0.00%	$ -
3. Grassland Water District			16.66716%	$ 16,783	$ 7,564	16.67%	$ 9,219
4. HMRD #2131			0.00000%	$ -	$ -	0.00%	$ -
5. Columbia Canal Company (Friend Member)			0.00000%	$ -	$ -	0.00%	$ -
6. Camp 13 Drainers			0.00000%	$ -	$ -	0.00%	$ -
Total Division 3	**0**	**0**	16.66716%	**$ 16,783**	**$ 7,564**		**$ 9,219**
DIVISION 4							
1. San Benito County Water District			0.00000%	$ -	$ -	0.00%	$ -
2. Santa Clara Valley Water District (2)			0.00000%	$ -	$ -	0.00%	$ -
Total Division 4	**0**	**0**	0.00000%	**$ -**	**$ -**		**$ -**
DIVISION 5							
1. Broadview Water District			0.00000%	$ -	$ -	0.00%	$ -
2. Eagle Field Water District	1,325	1,325	0.69418%	$ 699	$ 315	0.69%	$ 384
3. Fresno Slough WD	1,459	1,459	0.69418%	$ 699	$ 315	0.69%	$ 384
4. James Irrigation District			0.00000%	$ -	$ -	0.00%	$ -
5. Laguna Water District			0.00000%	$ -	$ -	0.00%	$ -
6. Mercy Springs Water District	3,840	3,840	0.69418%	$ 699	$ 315	0.69%	$ 384
7. Oro Loma Water District	1,258		0.69418%	$ 699	$ 315	0.69%	$ 384
8. Pacheco Water District	4,999	4,999	0.69517%	$ 700	$ 315	0.69%	$ 384
9. Reclamation District 1606			0.00000%	$ -	$ -	0.00%	$ -
10. Tranquillity ID	10,750	10,750	0.69517%	$ 700	$ 315	0.69%	$ 384
11. Turner Island Water District		0	0.00000%	$ -	$ -	0.00%	$ -
Total Division 5	**23,631**	**22,373**	3.47286%	**$ 4,196**	**$ 1,891**		**$ 2,305**
OTHER							
1. San Joaquin River Exchange Contractors**			16.6672%	$ 16,783	$ 7,564	16.67%	$ 9,219
2. Northwestern Delta Mendota Subbasin GSA (Stan. Cty 56,766 ac + Merced Cnty 3,035 ac)	59,801	0	1.66642%	$ 1,678	$ 756	1.67%	$ 922
2a. Merced County (5% of Northwestern DM GSA Cost)				*$ 84*			
2b. Stanislaus County (95% of Northwestern DM GSA Cost)				*$ 1,594*			
3. City of Patterson GSA .	6,140	0	1.66642%	$ 1,678	$ 756	1.67%	$ 922
4. Fresno County (Fresno County Management Area A/B	29,728	29,728	17.36134%	$ 17,482	$ 7,879	17.36%	$ 9,603
5. Merced County (Central DM Portion)	14,176	14,176	0.69418%	$ 699	$ 315	0.69%	$ 384
6. Santa Nella County Water District	1,488	1,488	0.69418%	$ 699	$ 315	0.69%	$ 384
7. Aliso Water District			16.66716%	$ 16,783	$ 7,564	16.67%	$ 9,219
8. Farmers Water District			16.66716%	$ 16,783	$ 7,564	16.67%	$ 9,219
9. Widren GSA	877		0.694175%	$ 699	$ 315	0.69%	$ 384
Total Other	**112,210**	**45,392**	22.08253%	**$ 73,284**	**$ 33,029**		**$ 40,254**
	323,788	**161,398**	**48.61%**	**$ 100,695**	$ 45,384	100.00%	$ 55,311

*Note: First Dues Collection includes all activities other than Proposition 68 funded contracts, which will be allocated to the beneficiaries as part of the second dues collection.
**Note: San Joaquin River Exchange Contractors to allocate to GSP Region participants.

Key Excerpts from SWRCB's August 2021 GSP Comment Letters in comparison to DWR's 3 June 2021 GSP Determination and Notification Letters, and Suggested Clarifications for the Northern & Central Delta-Mendota Region GSP

This document provides a summary of key issues identified by the State Water Resources Control Board (SWRCB) in their 23 August 2021 comment letters on five additional Groundwater Sustainability Plans (GSPs) that were submitted to Department of Water Resources (DWR). The common issues identified by the SWRCB are added to our previous analysis of the comments made by DWR in their 3 June 2021 determination and notification letters[1] summarizing findings regarding four GSPs. This document also provides suggested revisions or clarifications to the Northern & Central Delta-Mendota Region GSP (NCDM Region GSP) in light of the DWR and SWRCB comments.

COMMON THEMES

Common themes articulated in the SWRCB letters that related to the technical aspects of the GSPs were generally consistent with DWR comments on the other GSPs, as follows:

Water Levels: The SWRCB strongly recommends that groundwater sustainability agencies (GSAs) conduct an independent analysis of the potential impacts of proposed sustainable management criteria (SMCs) on active domestic and public water supply wells (especially related to disadvantaged communities [DACs]) and implement a well mitigation program. SMCs that allow for a continued decline in groundwater levels, especially past the year 2040 when overdrafted basins are required to reach sustainability, are not considered sustainable or consistent with the Sustainable Groundwater Management Act (SGMA).

Water Quality: The GSP should outline the process the GSAs would use to decide whether GSP implementation caused or exacerbated a minimum threshold (MT) exceedance for water quality and take the "human right to water" legislation directly into account. All available data should be considered and if multiple constituents of concern (COCs) have been detected in a basin, the rationale for only developing SMCs for a select few COCs must be justified.

Subsidence. SMCs that allow for continued subsidence or a continued decline in groundwater levels, especially a decline in levels to below the Corcoran Clay, are not considered sustainable.

Interconnected Surface Water (ISW): The SWRCB generally felt that the GSAs had not sufficiently made the case that water levels could be used as a proxy for addressing ISW or sufficiently characterized the nature and extent of ISW issues or groundwater dependent ecosystems (GDEs). The SWRCB expects that an ISW monitoring network will include stream gauges.

Projects and Management Actions (PMAs): The SWRCB expressed concerns related to the likelihood of success of the planned PMAs, cautioned the GSAs on the intersection of water rights permitting with planned PMAs (e.g., for those projects that anticipate relying on new or amended surface water rights as a source of supply), strongly encouraged the GSAs to get involved in the well permitting processes, and encouraged incorporation of demand management into the PMA plan.

[1] On 3 June 2021, DWR issued determination letters to the GSAs for two basins (the Santa Cruz Mid-County Basin and the 180/400-foot Aquifer Subbasin) approving the basins' GSPs, and issued notification letters to the GSAs for two other basins (the Paso Robles Area Subbasin and the Cuyama Basin), identifying deficiencies in the basins' GSPs and initiating consultation with the GSAs.

Stakeholder Engagement: The SWRCB provided significant comments on stakeholder outreach and engagement (especially related to engagement of DACs and tribal interests). The SWRCB comments, however, did not address issues related to inter-basin or intra-basin coordination.

DETAILED COMMENTS

Excerpts from the June 2021 DWR GSP review letters (provided in the original version of this attachment) are shown in *italics* font with grey highlighting with the particular comment letter identified by basin in parentheses. Excerpts from the August 2021 SWRCB GSP comment letters are shown in *italics* font with no highlighting, with the particular comment letter identified by basin in parentheses. Below each excerpt is an analysis of the NCDM Region GSP and recommendation(s) related to the anticipated receipt of similar comments by DWR and/or the SWRCB. Revised or added recommendations based on the recent SWRCB letters are shown in blue font.

All Sustainability Indicators

Key Excerpts from DWR June 2021 GSP Review Letters

- *"The GSA's definition needs to include a description of the processes and criteria relied upon to define undesirable results and must describe the effect of undesirable results on the beneficial uses and users of groundwater. From this definition, the GSA establishes minimum thresholds, which are quantitative values that represent groundwater conditions at representative monitoring sites that, when exceeded individually or in combination with minimum thresholds at other monitoring sites, may cause the basin to experience undesirable results." (Cuyama, page 2)*
- *"GSA should describe the anticipated effects of the established minimum thresholds and undesirable results on the interests of beneficial uses and users and how the GSA determined that those thresholds would avoid undesirable results in the Basin." (Cuyama, page 4)*
- *"Through review of the Plan and public comments, the Department determines that the GSA adequately responded to comments that raised credible technical or policy issues with the Plan, sufficient to warrant approval of the Plan at this time." (Santa Cruz Mid-County, page 4; 180/400-Ft Aquifer, page 3)*
- *"Lastly, the Department's review considers the comments submitted on the Plan and evaluates whether the GSA adequately responded to the comments that raise credible technical or policy issues with the Plan." (180/400-Ft Aquifer, page 9 of DWR Staff Report)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *"Parts of the GSPs narrative definition of an undesirable result are vague, making it difficult to assess how well the proposed MTs represent groundwater conditions that the GSAs plan to avoid…" (Chowchilla, page 5)*

General Suggestions Pertaining to All Sustainability Indicators

- Provide explicit description of the point at which effects from conditions become "significant and unreasonable", especially for the effects that are used to define Undesirable Results criteria, and provide a clear rationale for how the Minimum Thresholds are set to avoid those conditions.
- In the event that comments were received during the Public Draft GSP comment period and on the final adopted GSP, plan for and incorporate responses to those comments in any revisions to

the GSP (i.e., either in response to DWR's forthcoming determination letter or in the next five-year GSP update).

Chronic Lowering of Groundwater Levels

Key Excerpts from DWR June 2021 GSP Review Letters

- *"Clarify how the criteria defining when undesirable results occur in the Basin (i.e., 30 percent exceedance of minimum thresholds for two consecutive years) was established, the rationale behind the approach, and why it is consistent with avoiding the significant and unreasonable effects identified by the GSA." (Cuyama, page 4-5)*
- *"…estimate the number and kinds of wells expected to be impacted at the minimum thresholds identified in the GSP." (Cuyama, page 5)*
- *"…discussion should be supported using best available information such as using State or county information on well completion reports to analyze the locations and quantities of domestic wells and other types of well infrastructure that could be impacted by groundwater management when implementing the GSP." (Paso Robles, page 3-4)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *"… strongly recommends that the GSAs conduct an independent analysis of the potential impacts of proposed MOs and MTs… on active domestic and public water supply wells… and consider how those effects compare to a GSA's definition of an undesirable result related to declining groundwater levels. In addition, the GSAs should estimate and describe the population served by the wells… which are not protected at MTs." (Chowchilla, page 4; Merced, page 4; Tulare Lake, page 3)*
- *"the GSAs should adjust MTs …or otherwise mitigate for impacts to wells… the GSAs could develop and implement a well mitigation plan that would lessen the significance of the impact by replacing or repairing domestic or drinking water system wells impacted by groundwater level declines as a project or management action." (Chowchilla, page 4; Merced, page 4; Tulare Lake, page 3)*
- *"The GSP should evaluate MTs set below the Corcoran Clay and consider whether the MTs are appropriate" (Chowchilla, page 3; Merced, page 3)*
- *"In some locations, the … MOs [are] close to or deeper than the MTs, which are based on well depths…" (Merced, page 5)*
- *"it appears that … the GSP allows for continuing groundwater level declines past the year 2040 when the subbasin is required to reach sustainability. The GSP also appears to allow for continued long-term loss of groundwater storage and subsidence. State Water Board staff finds that the GSP's conclusion that overdraft is sustainable is not consistent with the Sustainable Groundwater Management Act (SGMA)…" (Tulare Basin, Page 1)*

Current NCDM GSP Approach	Suggested Clarifications
Effects on Beneficial Users (Section 6.3.1.1.4): "Dewatering of wells, inelastic land subsidence that can impact land use and water conveyance capacity, surface water depletions that can impact interconnected waterways, impact to productive	• Define exact quantities of when the listed effects become "significant and unreasonable", especially for the effects that are used to define Undesirable Results criteria.

agriculture, increased pumping costs and need to dig deeper wells for municipalities, and potential needs to seek new water sources".	• Consider developing a well mitigation plan that would lessen the impact of declines in groundwater levels by replacing or repairing domestic or drinking water system wells impacted by groundwater level declines.
Definition of Undesirable Results (Section 6.3.1.1.2): "…Conditions are deemed 'significant and unreasonable', when groundwater elevations drop below the site-specific minimum threshold at 40 percent of representative monitoring wells in a principal aquifer in the Northern and Central Delta-Mendota Regions concurrently over a given year (7 out of 17 wells in the Upper Aquifer and/or 8 out of 18 wells In the Lower Aquifer)".	• Clarify how the definition of the Undesirable Results will avoid specified "significant and unreasonable effects" (e.g., have to tie the 40% threshold back to the quantitative analysis of potential well impacts or subsidence and the effects on beneficial users).
Setting Minimum Thresholds (Section 6.3.1.2): The Minimum Thresholds are "… set as the hydrologic low for wells perforated in the Upper Aquifer (above the Corcoran Clay) and 95 percent of the hydrologic low for wells perforated in the Lower Aquifer (below the Corcoran Clay) over the available hydrographs on record". "Significant impacts are not anticipated to occur for drinking water users. Including domestic well users" when 2015 levels (historic lows) are used as minimum thresholds".	• Clarify what is meant by "95 percent of the hydrologic low", as it relates to the setting of Minimum Thresholds for wells perforated in the Lower Aquifer (below the Corcoran Clay). • Provide quantitative justification for the MTs. For example, perform/describe a <u>well impact analysis</u> to estimate how many wells could be dewatered or how much subsidence could occur at the MTs. This should be coupled to the definition of "significant and unreasonable effects" that constitute an Undesirable Result in terms of effects on beneficial users. • Confirm that the MTs are set at levels that would not allow water levels to fall below the Corcoran Clay layer. If the MTs would allow water levels to fall below the Corcoran Clay, consider raising the MTs to a higher level, above the Corcoran Clay.
Measurable Objectives and Interim Milestones (Section 6.3.1.3) "The measurable objective is set at the lowest value of three parameters: the average historic seasonal high over the available hydrograph, Spring 2012 seasonal high, or Spring 2017 seasonal high."	• Consider re-evaluating the SMCs for the RMS wells where MOs are set very close to the MTs (e.g., wells 03-003, 01-004).

Reduction of Groundwater Storage

<u>Key Excerpts from SWRCB August 2021 GSP Comment Letters</u>

- *"it appears that … the GSP allows for continuing groundwater level declines past the year 2040 when the subbasin is required to reach sustainability. The GSP also appears to allow for continued long-term loss of groundwater storage and subsidence. State Water Board staff finds that the*

GSP's conclusion that overdraft is sustainable is not consistent with the Sustainable Groundwater Management Act (SGMA)…" (Tulare Basin, page 1)

- *"The GSP uses the groundwater elevation MTs developed to manage for decreasing groundwater levels as a proxy [for decrease in groundwater storage] …; however, the GSP does not draw a direct link between the SMC for declining groundwater levels and undesirable results related to depletions of [groundwater storage]…" (corollary to ISW arguments presented in Merced, page 7; Eastern San Joaquin, page 5)*

Current NCDM GSP Approach	**Suggested Clarifications**
Causes of Undesirable Results (Section 6.3.2.1.3): "… dramatic increases in reliance on groundwater, severe drought, or other major changes in groundwater management over time". "… regulatory requirements placed on CVP and SWP operations, as well as instream flow requirements on the San Joaquin River and its tributaries".	• Since Undesirable Results are being tied to groundwater levels, the causes listed would be expected to be the same causes as for Chronic Lowering of Groundwater Levels rather than this new/different set of causes (or at least add this to the set of causes for Chronic Lowering of Groundwater Levels).
Effects on Beneficial Users (Section 6.3.2.1.4): "…undesirable effects could include encroachment on the groundwater reserved as a drought buffer, increased cost of pumping as deeper wells are required to access groundwater, and reduction in beneficial uses".	• Be more specific in defining when effects of conditions related to Reduction of Groundwater Storage become "significant and unreasonable", especially any effects that are distinct from those related to Chronic Lowering of Groundwater Levels. Without specific metrics, it is difficult to assess what magnitude of impacts is considered reasonable.
Setting Minimum Thresholds (Section 6.3.2.2): "This GSP uses groundwater levels minimum thresholds as a proxy for the reduction of groundwater storage sustainability indicator".	• Provide technical support for the argument of correlation between groundwater levels and groundwater storage and justifying the use of MTs for Chronic Lowering of Groundwater Levels as a proxy for Reduction of Groundwater Storage, with specific consideration of the metrics associated with the definitions of MTs and Undesirable Results.

Degraded Water Quality

Key Excerpts from DWR June 2021 GSP Review Letters

- *"SGMA and the GSP Regulations do not require a GSP to address undesirable results associated with degraded water quality that occurred before, and have not been corrected by, January 1, 2015." (Cuyama, page 7)*
- *"The Department received comments that raise credible technical issues regarding groundwater quality data that apparently were not considered when developing the GSP but are available to the public and likely, in the opinion of Department staff, to alter the GSA's assessment of the Basin conditions. The GSA should coordinate with interested parties that submitted comments, in*

particular with the Regional Water Quality Control Board, to obtain best available information regarding basinwide water quality." (Cuyama, page 8)

- *"(S)taff find that the approach to focus only on water quality impacts associated with GSP implementation, i.e., GSP-related projects, is inappropriately narrow. Department staff recognize that GSAs are not responsible for improving existing degraded water quality conditions. GSAs are required; however, to manage future groundwater extraction to ensure that groundwater use subject to its jurisdiction does not significantly and unreasonably exacerbate existing degraded water quality conditions. … the analysis should be on whether groundwater extraction is causing the degradation in contrast to only looking at whether a specific project or management activity results in water quality degradation. Department staff recommend that the SVBGSA coordinate with the appropriate water quality regulatory programs and agencies … to understand and develop a process for determining when groundwater management and extraction is resulting in degraded water quality in the Subbasin." (180/400-Ft Aquifer, page 26-27)*
- *"Define what constitutes "average hydrogeologic conditions" and how the "long-term average over all hydrogeologic conditions" will be calculated for the consideration of undesirable results for reduction of groundwater storage and depletions of interconnected surface water." (180/400-Ft Aquifer, page 37)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters:

- *"The GSP states that only groundwater quality degradation caused by GSP implementation will constitute a MT exceedance contributing to an undesirable result but does not explain how causation will be assessed … The GSP should outline the process the GSAs would use to decide whether GSP implementation caused or exacerbated an MT exceedance for water quality. In addition, the GSP should provide the data supporting its conclusions…" (Chowchilla, page 6; Merced, page 6; Eastern San Joaquin, page 4; Tulare Lake, page 5)*
- *"In deciding which water quality constituents to consider when setting SMC, a GSA should consider the best available water quality information for the basin…" (Chowchilla, page 6; Eastern San Joaquin, page 3; Tulare Lake, page 6)*
- *"If data indicate the contaminant is relatively widespread in the subbasin, the GSAs should develop SMCs ..." (Chowchilla, page 6; similar statements in Eastern San Joaquin, page 3, and Merced, page 5)*
- *A GSA should particularly consider whether any groundwater quality constituents in the basin may impact the state's policy of protecting the right of every human being to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes (Water Code, §106.3)." (Chowchilla, page 7; Merced, page 5; Eastern San Joaquin, page 3; Tulare Lake, page 4)*
- *"The GSP sets the MT concentrations for degraded water quality at 1000 milligrams per liter (mg/L) TDS… For TDS in drinking water, the secondary maximum contaminant level (SMCL) is 500 mg/L – the recommended maximum contaminant level – and the upper limit SMCL is 1,000 mg/L. Staff recommends that the GSP further discuss consideration of drinking water users in setting the GSP's water quality SMC." (Eastern San Joaquin, pages 3-4)*

Current NCDM GSP Approach	Suggested Clarifications
Undesirable Results Causes (Section 6.3.3.1.3): "TDS, nitrate as N, and boron have been identified as constituents of concern and are largely the result of non-point sources". "Elevated TDS and boron concentration are primarily a result of a combination of land use practices, the geochemistry of the Coast Range rocks, recharge derived from the Coast Range streams, dissolvable materials within the alluvial fan complexes, and the naturally poor-draining conditions which tends to result in accumulation of these constituents". "Elevated nitrate as N is largely the result of agricultural applications of fertilizer along with leaching from naturally-occurring alluvium…" "Similarly, elevated boron concentrations are also the result of applied pesticides and accumulation in areas of poor drainage".	• Provide further explanation of how these causes relate to groundwater management activities under the purview of the GSAs, to tie in better with the justification of the MT and Undesirable Results definitions. • The GSP should outline the process the GSAs would use to decide whether GSP implementation caused or exacerbated an MT exceedance for water quality.
Undesirable Results Justification (Section 6.3.3.1.1) "Total Dissolved Solids (TDS), nitrate …, and boron … were selected based on available data, the potential to impact existing or future groundwater use, the ability to address groundwater quality impacts through projects and/or management actions, and the source of the constituent". **"**While other constituents of concern are known to exist in the Delta-Mendota Subbasin (such as arsenic, selenium, and hexavalent chromium), concentrations of these constituents do not appear to be linked to groundwater elevations or other groundwater-related management activities".	• Be more specific in defining when the listed effects become "significant and unreasonable", especially for the effects that are used to define Undesirable Results criteria. • The NCDM GSP (Section 5.3.5) states that other constituents of concern include arsenic, selenium, and hexavalent chromium are present in the NCDM Region but that they are naturally occurring and "do not appear to be linked to groundwater elevations … [and] … (t)here are no specific projects and/or management practices that can be implemented to mitigate for these constituents (other than groundwater treatment … [and] therefore, the constituents are not considered manageable as part of this GSP." Suggest providing additional citation to datasets, sources and analysis that demonstrate the lack of correlation described above. • Consider directly addressing the human right to water (Water Code, §106.3).
Setting Minimum Thresholds (Section 6.3.3.2): "The minimum thresholds for the degraded water quality sustainability indicator are set as the upper Secondary MCL for TDS (1,000 mg/L)… [MCLs] … or current groundwater quality as of December 2018 for both the Upper Aquifer and Lower Aquifer if the listed MCL or WQO is already exceeded".	• The provision of SGMA related to not requiring GSPs to address "pre-existing" undesirable results (California Water Code § 10727.2(b)(4)) applies to undesirable results that existed as of January 1, 2015, not December 2018, and thus the use of the greater of MCLs, WQOs, or observed levels as of December 2018 may not be acceptable. Suggest revising this component of the Minimum

	Thresholds definition to refer to 1 January 2015 rather than December 2018. • The SWRCB questioned the use of the upper Secondary MCL (1,000 mg/L) as the minimum threshold for TDS. Consider providing a stronger argument for using 1,000 mg/L that considers the impacts to drinking water users.
Undesirable Results Criteria (Section 6.3.3.1.2): "Groundwater quality exceeds Maximum Contaminant Levels (MCLs) or water quality objectives (WQOs) for TDS, nitrate, or boron over three (3) consecutive sampling events in non-drought years, or additional degradation of current groundwater quality where current groundwater quality exceeds the MCLs or WQOs".	• Provide explicit definition of "non-drought years" so that conditions under which an Undesirable Result is possible are clearly defined. • Unclear how many wells in the Representative Monitoring Network would have to exceed the MT criteria before there was an Undesirable Result. Provide quantitative justification for the definition of "significant and unreasonable effects" that constitute an Undesirable Result in terms of effects on beneficial users.

Land Subsidence

Key Excerpts from DWR June 2021 GSP Review Letters

- *"Department staff believe there is sufficient data to indicate the potential of [interconnected surface water][2] in the Subbasin that warrants and requires setting initial sustainable management criteria that may be reevaluated and potentially modified as new data become available. Not developing criteria limits the ability of Department staff to assess whether the Subbasin is being, or will be, sustainability managed within 20 years." (Paso Robles, page 8)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *"If water levels are allowed to drop below the Corcoran Clay, this would result in the near-surface unconfined aquifer being completely dewatered in this area. Additionally, subsidence could occur due to dewatering of the clays." (Chowchilla, page 3; Merced, page 3)*

Current NCDM GSP Approach	Suggested Clarifications
Setting Minimum Thresholds (Section 6.3.5.2): For the WSID-PID MA: "Acceptable loss in distribution capacity (as based on a future capacity study) due to inelastic land subsidence resulting from groundwater pumping. Numerical values for this criterion to be determined based on data collection between 2020 and 2025".	• Not setting any MTs for Land Subsidence in the WSID-PID MA (i.e., having them to-be-determined [TBD]) may not be acceptable to DWR. Suggest providing some interim MT that could be refined in the future. • Explain in greater detail how the data to be collected between 2020 and 2025 (i.e., the capacity study) will be used to develop MTs for Land Subsidence.

[2] While the DWR comment excerpt shown here is related to Interconnected Surface Water, the same logic would presumably also apply to Land Subsidence.

	• Confirm that the groundwater level MTs are set at levels that would not allow water levels to fall below the Corcoran Clay.
Undesirable Results Criteria (Section 6.3.5.1.2): For the WSID-PID MA: "Significant impacts occur to laterals from differential settlement that reduces the ability to deliver surface water supplies".	• Specify what amount of capacity reduction in the WSID-PID MA would be considered "significant and unreasonable". Without specific metrics, it is difficult to assess what magnitude of impacts is considered reasonable.

Depletions of Interconnected Surface Water

Key Excerpts from DWR June 2021 GSP Review Letters

- *"If the GSAs cannot provide a sufficient, evidence-based justification for the absence of interconnected surface water, then they should develop sustainable management criteria, as required in the GSP Regulations, 41 based on best available information and science." (Paso Robles, page 8)*
- *"Department staff find that the sustainable management criteria currently presented in the GSP (i.e., not defining and establishing criteria) is not commensurate with the level of understanding of the basin setting." (Paso Robles, page 7)*
- *"If data are not available to support evaluation of the effects of established minimum thresholds on environmental uses and users, the GSA should clarify the strategy, mechanism, and timeline for acquiring that data and incorporating that data into management of the Basin." (Cuyama, page 5)*
- *"The Plan explains that, due to uncertainty in surface water-groundwater modeling and the complexities involved with determining stream depletions due to groundwater use, the Basin will use shallow near stream groundwater levels as proxy for minimum thresholds of depletions of interconnected surface water. … The Plan recognizes the limited monitoring data as a data gap and discusses the complexities of significantly correlating stream depletions and shallow groundwater levels. … (T)he Plan states that to better characterize interconnections between surface water and groundwater, additional monitoring of shallow groundwater levels is needed in the upper reaches of Soquel Creek and on other creeks that indicate hydraulic connectivity to groundwater. … Department staff also believe the MGA uses the best information and science available at the time of Plan development to understand hydraulic connectivity of surface water in the Basin and proposes actions to address the data gaps that appear reasonable." (Santa Cruz Mid-County, page 24-25 of DWR Staff Report)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- "*The GSP identifies interconnected stream reaches through numerical modeling but does not adequately characterize the locations, quantity, and timing of interconnected surface water (ISW) depletions." (Merced, page 6)*
- *The GSP uses the groundwater elevation MTs developed to manage for decreasing groundwater levels as a proxy to also manage depletions of ISW in the Merced River; however, the GSP does not*

draw a direct link between the SMC for declining groundwater levels and undesirable results related to depletions of ISW." (Merced, page 7; Eastern San Joaquin, page 5)

- "*State Water Board staff recommends that shallow groundwater level MTs for depletions of ISW be supported by considerations of the locations, quantity, and timing of depletions and impacts to beneficial users." (Eastern San Joaquin, page 5)*
- *"Staff recommends the GSAs develop additional ISW monitoring sites in a timely manner, especially along the Merced and San Joaquin Rivers, and set meaningful SMC for depletions of ISW." (Merced, page 7)*
- *"…the GSP also acknowledges data gaps and uncertainty regarding the hydraulic connectivity between shallow groundwater, deep groundwater and surface water. State Water Board staff recommends that the GSAs use data from additional shallow groundwater wells to clarify the Hydrogeologic Conceptual Model….if the additional data does not support the use of deeper groundwater elevations as a proxy for depletions of ISW, then State Water Board staff recommends that the GSP establish Sustainable Management Criteria based on the volume, rate, and timing of surface water depletions caused by groundwater pumping." (North and South Yuba, page 3-4)*

Current NCDM GSP Approach	**Suggested Clarifications**
Undesirable Results Definition (Section 6.3.6.1.2): "… when interconnected stretches of surface water are identified and a significant increase in the depletions of surface water is occurring as a result of groundwater pumping". "The percent increase in depletions considered significant, identified herein as 'X', is to be determined from monitoring data to be collected between 2020 and 2025 and associated analysis of these data".	• Provide quantitative definition of when effects become "significant and unreasonable". Without specific metrics, it is difficult to assess what magnitude of impacts is considered reasonable.
Minimum Thresholds Definition (Section 6.3.6.2): "An X percent increase in surface water depletions along interconnected stretches of surface water as a result of groundwater pumping, where 'X' is the present increase in depletions to be determined from monition data collected between 2020 and 2025 and associated analyses of these data".	• Having MTs for Depletion of Interconnected Surface Water be to-be-determined (TBD) may not be acceptable to DWR. Suggest providing some interim MTs that could be refined in the future. • A strong technical case must be made that groundwater levels can be used as a proxy for setting SMCs for Interconnected Surface Water.
Justification of Minimum Thresholds (Section 6.3.6.2): "Data collected from wells within the depletions of interconnected surface water monitoring network and stream gauges located along the San Joaquin River between 2020 and 2025 will be analyzed to determine the location, timing, and quantity of depletions over reaches of interconnected surface water within and/or adjoining the Northern and Central Delta-Mendota Regions".	• Given that the required infrastructure does not exist at this point, the GSAs will not be able to demonstrate that they collected data beginning in 2020 that will be used to develop MTs for Depletions of Interconnected Surface Water. • The GSAs should continue to prioritize development of the ISW monitoring network to enable collection of data to support SMC development, including wells and stream gauges.

Water Budget

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *"Because the GSP is required to use a 50-year planning horizon, staff recommends the [GSAs] incorporate strategies in the GSP that anticipate potential changes to the subbasin-wide water budget from Bay-Delta Plan implementation…" (Eastern San Joaquin, page 8; Merced, page 8)*

Current NCDM GSP Approach	Suggested Clarifications
The GSP does not mention the Bay-Delta Plan update or consider it in the water budget.	• Consider the Bay-Delta Plan update in the water budget section of the GSP and how it could affect the availability of surface water and the water budget within the GSP area.

Projects and Management Actions

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *"Implementing some of the projects identified in the GSP may require new or amended water rights. If a project would rely on existing water rights, the GSAs should identify the water right identification numbers and other relevant details. It may be unreasonable for the GSP to assume that projects that currently lack adequate water rights for implementation can obtain either new water rights or modifications to existing water rights within a timeframe that will allow the project to contribute to the GSP achieving sustainability." (Chowchilla, page 7; Merced, page 10)*
- *"The GSP should also identify alternative groundwater management strategies to achieve sustainability (e.g., demand reduction), if anticipated water supplies such as purchases or new or amended water rights are unsuccessful. This would ensure the GSAs can effectively evaluate when they should move towards implementing such contingency projects or management actions if primary projects or management actions are not implemented on projected timelines. To this end, the GSP should also identify well-developed demand management options with clearly defined triggers in the event that proposed supply augmentation volumes are not fully achieved." (Chowchilla, page 8)*
- *"The GSP lacks specific information regarding how the GSAs will evaluate new permits, address possible impacts from new permits, or work with the county to address concerns. As encouraged by the Sustainable Groundwater Management Act (SGMA), GSAs should request counties forward permit requests for new wells, for enlarging of existing wells, or for reactivation of abandoned wells" (Chowchilla, page 6; Merced, page 9). "State Water Board staff recommends that GSAs work with county governments to encourage alignment between the GSP and county well permitting programs." (Tulare Basin, Page 4)*

Current NCDM GSP Approach	Suggested Clarifications
Increasing GSA Access to and Input on Well Permits (Section 7.1.1.2.3) "Under this management action, the Counties would develop and/or change internal policies associated	• The GSAs should continue to prioritize the development of a process to evaluate new well permits and address possible impacts from new

with well permitting to include consultation with and consideration of input from GSAs relative to if and where a proposed well would be located".	wells.
Projects and Management Actions (Section 7.1) SLDMWA GSP mentions existing water rights that are relevant for projects, but does not provide water right identification numbers or the timing and uncertainties of obtaining new rights or modifying existing ones.	• Clarify whether water rights are required for projects. If existing water rights are required, specify the identification number. If new or modified rights would be required, discuss how obtaining water rights impacts the feasibility and timeframe of the project.

Stakeholder Engagement

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *"The GSP should be more explicit about how the concerns of local beneficial users, particularly disadvantaged communities reliant on groundwater, and other stakeholders were integrated into the development of SMC and monitoring networks and selection of RMS and projects and management actions." (Chowchilla, page 9; Merced, page 11; Tulare Lake, page 9)*
- *"The GSP states that no California Native American Tribes are present in the subbasin; however the GSP does not describe the GSAs' process for identifying or reaching out to Tribes with potential interests in groundwater management in the subbasin…The GSP should elaborate on the GSAs tribal engagement effort." (Chowchilla, page 9; Merced, page 11)*

Current NCDM GSP Approach	**Suggested Clarifications**
SLDMWA GSP describes engagement for SMC development but lacks description on how beneficial users were integrated into RMS selection, monitoring network development (Section 7.2.5.1.1), and projects and management actions (Section 7.1).	• Add descriptions on how beneficial users were integrated into RMS selection and monitoring network development (Section 7.2.5.1.1), and Projects/Management Actions (Section 7.1).
Regional Economic Issues and Trends (Section 2.1.2.6) "Note that according to the U.S. Department of the Interior Indian Affairs, as of January 2017 there are no listed recognized tribes within the Region".	• Even though no Tribes exist within the basin, suggest describing any outreach or effort that was made to involve Tribes that have potential interests in the basin.

MEMORANDUM

TO: Delta-Mendota Subbasin Coordination Committee Members and Alternates

FROM: John Brodie, Water Resources Manager

DATE: September 9, 2021

RE: Summary of Coordination Committee Written Report Items – September 9, 2021

A. IMPLEMENTATION EFFORTS

i. Monitoring Activities and Reporting Responsibilities

GSP Group representatives successfully uploaded water level data to the DWR SGMA Portal by the July 1st deadline for data collected at representative monitoring sites during the 2021 seasonal high period (February 1 – April 30). This upload deadline also included the submission of sustainable management criteria (SMC) for representative water level monitoring sites. SLDMWA staff coordinated with GSP Group representatives and supporting staff to upload these data by the deadline.

DWR staff recently reviewed these submissions and provided responses to John Brodie as the Subbasin's point-of-contact. DWR provided comments on the Grassland GSP, Northern & Central Delta-Mendota Region GSP (NCDM GSP), and San Joaquin River Exchange Contractors GSP (SJREC GSP). SLDMWA staff coordinated with representatives from each of these three GSPs to confirm the suggested edits and questions received from DWR. No edits or questions were shared in response to the Aliso Water District GSP (Aliso GSP), Farmers Water District GSP (Farmers GSP), or Fresno County Management Areas A & B GSP (Fresno GSP).

ii. Well Permitting Discussions

County and GSA representatives have continued to discuss well permitting processes and how GSAs may be involved in permitting review. Within the NCDM GSP Group, representatives from Stanislaus, Merced, and Fresno Counties have provided updates at monthly meetings of the Northern and Central Management Committees.

Merced County held a workshop with GSA representatives in mid-August focused on review of proposed changes to the County's groundwater ordinance. This workshop provided an overview for avenues of GSA involvement in the application review process. The proposed ordinance would include GSA review of permit applications for wells within a given GSA's boundaries. This review would include providing a determination of consistency with the adopted GSP and regulating well through GSP implementation activities.

iii. GSP Implementation Activities

The deadline to complete annual water quality sampling was August 31st. The deadline for uploading water quality data to the Subbasin's data management system (DMS) is October 31st. The window is now open for fall/seasonal low water level monitoring. Please make sure water level monitoring is completed by October 31st. These data must be uploaded to the SGMA Portal by January 1st.

iv. Upcoming Grant Funding Opportunities

DWR anticipates a non-competitive funding opportunity for all critically overdrafted subbasins, with funding expected at approximately January 1, 2022. Available funds can be used for both projects and planning. On the planning side, that includes making changes to GSPs in response to DWR required or recommended changes associated with GSP approval. This opportunity will be a part of the main discussion during the meeting.

DWR's Small Community Drought Program will provide immediate and short-term financial and technical support to small communities survive the current and future droughts. Applications will be accepted until 12/29/23 or until funds are exhausted. Irrigation districts, flood control districts, reclamation districts, and community services districts are among eligible entities to receive this funding.

Building Resilient Infrastructure and Communities (BRIC) and Flood Mitigation Assistance Programs are available via the Governor's Office of Emergency Services. They seek high-impact, neighborhood scale, natural hazard risk reduction that mitigates risk to critical infrastructure or achieves whole community risk-reduction. Deadline: 12/1/21.

Farm and Ranch Solid Waste Clean-up Abatement Program: to clean up illegal dumps on farm/ranch property. Deadline 11/11/21.

Water and Energy Efficiency Grants. This USBR program requires a 50% match and provides funding for projects that result in quantifiable water savings, implement renewable energy components, and support broader sustainability benefits. Deadline 11/3/21.

Environmental Water Resources Projects via the USBR. This opportunity has a 25% match requirement. This new program supports projects focused on environmental benefits that have been developed as part of a collaborative process to help carry out an established strategy to increase the reliability of water resources. The deadline is 12/9/21.

B. SPECIAL PROJECTS

i. Well Census and Inventory Projects

Aliso GSP: The Aliso Water District has successfully worked to match well completion reports to known well locations, and is working to confirm these findings with landowners. Moving forward the District will pursue filling any known data gaps by utilizing the available grant funding to video select wells.

NCDM GSP: The Northern and Central Regions' well census efforts have continued with GSA and member agency review of preliminary well maps. The consultant team has compiled and verified

available well completion reports. Wells near the San Joaquin River were identified as potential sites for the NCDM GSP's interconnected surface water monitoring network.

SJREC GSP: The San Joaquin River Exchange Contractors GSP Group is continuing to collect data on wells, but no known changes to well data at this time.

Farmers GSP: A small number of potential domestic wells were identified via satellite imagery. Planning is ongoing for an on-ground survey to confirm the existence of said wells and to attempt to match them with previously identified well completion reports.

Fresno County GSP: A survey of satellite imagery indicated a number previously unmapped wells. Work is currently ongoing to obtain additional well completion reports from the County, and to match them with identified locations. Additionally, an on-ground survey is planned for the near future.

Grassland GSP: Confirm status in meeting; anticipate complete.

ii. Subsidence Characterization Study

The GSI Environmental, Inc. (GSI) team has continued to compile and review data for the Subbasin's subsidence characterization study. Groundwater extraction data has been requested from GSAs, municipalities, and coordinating agencies to support the subsidence evaluation project. A Technical Working Group meeting will be held in mid-fall 2021 to review progress on the project to date.

iii. USBR/USGS CVHM2-SJB Modeling Efforts

GSP Group representatives and SLDMWA staff have met with USBR and USGS staff to review and provide feedback on the Central Halley Hydrologic Model 2-San Joaquin Basin (CVHM2-SJB) modeling efforts. USBR and USGS staff are striving to develop a model that is accurate of water use in the Subbasin to support GSP implementation. The most recent meeting was held September 3rd. This meeting included a discussion of the level of detail and understanding of water delivery and reuse within the Subbasin needed to refine the model for future use. USBR and USGS staff will aim to refine the model with additional data from the Common Chapter and individual GSPs and schedule a follow-up meeting with Subbasin representatives to review the updated model results.

C. INTER-BASIN COORDINATION EFFORTS

i. Facilitation Support Services (FSS) Inter-basin Coordination Progress

The inter-basin coordination group, consisting of representatives from the Chowchilla, Delta-Mendota, Madera, and Merced Subbasins, had a productive session discussing how to address subsidence in the agreed-upon San Joaquin Valley focus area. Facilitated meetings will occur less frequently while the various groups begin collecting more data, a need that all agreed must be met in order to better understand subsidence in the region. The Chowchilla and Madera Subbasins have identified significant obstacles to collecting some of the lower aquifer extraction data. Delta-Mendota Subbasin representatives offered to assist other subbasins in outlining data collection protocols and lessons learned.

The next steps will include formalizing an agreement on next steps among the FSS participants for the subsidence focus area project, and discuss interim actions and incentives as the group awaits data collection efforts. The frequency of meeting will be reduced to facilitate data collection.

ii. Review of Neighboring Subbasins' Draft GSPs and Comment Process

Draft chapters and compiled GSPs are being released by neighboring subbasins in advance of the January 2022 deadline. The Tracy Subbasin, which borders the northern portion of the NCDM GSP, released a compiled draft GSP in August. The Northern and Central Management Committees decided to submit a comment letter in response to the draft Tracy Subbasin GSP. Additional opportunities for the Subbasin to comment will occur after it is submitted to DWR.

The Turlock Subbasin recently released a public draft of the water budget chapter for its GSP. The deadline for public comments to this chapter is September 30, 2021. Opportunity to submit comments on the entire GSP will occur once it is submitted to DWR for approval.