Joint Telephonic Meeting of the Northern Delta-Mendota Region Management Committee, Central Delta-Mendota Region Management Committee, and Central Delta-Mendota GSA

Thursday, August 26th, 2021, 10:00 AM

Click here to join Zoom meeting
Call-in Number: +1-669-900-6833
Meeting ID: 854 2754 4345
Passcode: 367929

SLDMWA Boardroom, 842 6th Street, Los Banos, CA

Management Committee and Central GSA Members and Alternates Present

Northern DM Region Management Committee

Anthea Hansen, Member/Alternate – Del Puerto and Oak Flat Water Districts
Adam Scheuber, Alternate – Del Puerto Water District
Bobby Pierce, Member – West Stanislaus Irrigation District
Vince Lucchesi, Member – Patterson Irrigation District
Walt Ward, Member – Stanislaus County County
Maria Encinas, Member – City of Patterson

Central DM Region Management Committee

Randy Miles*, Alternate – Eagle Field Water District
Danny Wade*, Member/Alternate – Fresno Slough Water District/Tranquillity Irrigation District
Juan Cadena*, Alternate – Mercy Springs Water District
Aaron Barcellos*, Member – Pacheco Water District
Michael Linneman*, Member – Panoche Water District
Mike Wood*, Member – San Luis Water District
Steve Stadler*, Alternate – San Luis Water District
Augie Ramirez*, Alternate – Fresno County
Damian Aragona, Member – Widren Water District

*Indicates representative, alternate, or 2nd alternate of the Central Delta-Mendota GSA

San Luis & Delta-Mendota Water Authority Representatives Present

John Brodie
Joyce Machado
Stewart Davis
Claire Howard – Provost & Pritchard

Others Present

Leslie Dumas – Woodard & Curran
Anona Dutton – EKI Environment & Water, Inc.
Joe Hopkins – Provost & Pritchard
Gabriel Delgado – Baker Manock & Jensen

1. **Call to Order/Roll Call**

Aaron Barcellos/Pacheco called the meeting to order at 10:05 AM.

2. **Committees 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 received.

4. **Committees to Review and Take Action on Consent Calendar, Barcellos**
   a. **Minutes for the July 29th, 2021 Joint Telephonic Meeting of the Northern and Central Delta-Mendota Region Management Committees and Central Delta-Mendota GSA**
   b. **June 2021 Budget to Actual Report**

No comments were shared on the July 29th meeting minutes. Joyce Machado/SLDMWA reviewed the June 2021 budget to actual report. Joyce shared that Funds 64 and 65 for the Northern and Central Regions, respectively, are trending positive. She also noted that a preliminary unaudited budget to actual report for Fiscal Year 2021 is included in the meeting materials. Joyce explained that once the Fiscal Year 2021 audit is complete, the audited summaries for Funds 64 and 65 will be used during the Fiscal Year 2023 budget preparation process.

The Committees considered approval of the consent calendar. Vince Lucchesi/PID provided the motion for the Northern Management Committee and Maria Encinas/Patterson seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present. Augie Ramirez/Fresno provided the motion for the Central Management Committee and Steve Stadler/SLWD seconded. The Central Management Committee voted by roll call; the motion was passed unanimously by those present.

5. **Committees to Authorize Submittal of Comment Letter on Draft Tracy Subbasin GSP and Formalize Process for Addressing Future Draft GSP Comment Letters, Brodie**

John Brodie/SLDMWA shared that the Tracy Subbasin, which borders the northern end of the Delta-Mendota Subbasin, released a draft version of their GSP. The public comment period for this draft GSP closes September 9th. John noted that another comment period will be available once the final GSP is submitted to DWR's SGMA Portal by the January 31, 2022 deadline. The Committees provided direction for John to develop a draft comment letter to share for feedback via email in compliance with the Brown Act. The Committees will provide input and confirmation on a final version prior to Bobby Pierce/WSID and Aaron Barcellos/Pacheco providing signatures as the Northern and Central Management Committee chairs.

6. **GSP Group Representatives Report from Subbasin Technical Working Group and Coordination Committee Meeting on August 11, 2021, Brodie/Lucchesi**

John Brodie/SLDMWA and Vince Lucchesi/PID provided a summary from the recent Technical Working Group and Coordination Committee meeting held on August 11th. This meeting was held with representatives from USBR and USGS to review recent progress on the Central Valley Hydrologic Model 2 – San Joaquin Basin (CVHM2-SJB) groundwater model. John and Vince

explained that this meeting provided an opportunity for Delta-Mendota Subbasin representatives to share feedback with USBR and USGS teams on data and processes used in the model development so far. Follow-up meetings will be scheduled with Subbasin representatives to review surface water diversion and reuse data used in the GSP development process that may refine the CVHM2-SJB model.

7. **Committees to Discuss DWR Review of Sustainable Management Criteria (SGMA Portal), Brodie**

John Brodie/SLDMWA provided an update on recent Subbasin data reporting. Each GSP Group uploaded sustainable management criteria (SMC) data to the SGMA Portal along with spring water level data for representative monitoring sites. DWR responded with some clarification regarding uploaded SMC data to ensure consistency between data in each GSP and the SGMA Portal's Monitoring Network Module. SLDMWA staff will continue to coordinate between DWR staff and GSP Group representatives to finalize this monitoring information.

8. **Committees to Discuss Recent Requests for Input/Data, Brodie**
   a. **California Water Commission Survey: Water Trading**

   b. **DWR Survey: GSP Funding Requests**

John Brodie/SLDMWA thanked the Committee members for sharing responses requested for recent surveys from the California Water Commission and DWR. He noted that input received was incorporated into the final survey responses.

   c. **Water Levels from "Supplemental" Wells to Support Aquifer Contours (Annual Report)**

Leslie Dumas/W&C explained that the Committee members will receive a request to share water level data from supplemental monitoring sites. These data will be incorporated into the Water Year 2021 Annual Report. Leslie also requested input from the Committee members on the water level contour map process. Leslie noted that Ken D. Schmidt & Associates (KDSA) has supported the contour map process for the past two Annual Reports. Leslie requested input from the Committee members regarding future contour map development. The Committees expressed interest in maintaining continuity in the contour development process, and continuing to work with the KDSA team. Leslie noted that she will also confirm this approach with the Coordination Committee at the next meeting.

   d. **OPTI Database (Project Descriptions) to Support Funding Requests**

John reminded the Committee members to update project descriptions and detail in the Opti database (https://opti.woodardcurran.com/irwm/wsj/login.php), which will be used to gather project information when preparing for upcoming grant funding opportunities.

9. **Well Permit Review Process, Howard/County Representatives**

Walt Ward/Stanislaus shared that Stanislaus County is awaiting review from their legal team for the proposed well permitting process. Walt also noted that he is working with DM-II GSA and Central California Irrigation District to review new well permit applications received in those areas. Anthea Hansen/DPWD expressed concern regarding placing this responsibility on GSAs. She noted that for the time being, the DM-II GSA is proceeding cautiously. Steve Stadler/SLWD echoed Anthea's concerns regarding GSA involvement in this process.

Walt also noted that the California State Supreme Court decision on discretionary and ministerial well permitting processes may affect CEQA requirements for new wells.

10. Committees to Discuss 2021 GSP Implementation

a. Three-Month Look-Ahead Schedule, Dutton

Anona Dutton/EKI reviewed the three-month look-ahead schedule and noted new letters recently released by SWRCB on several GSPs. Anona clarified that these are different from the assessment letters that DWR will release, but that SWRCB has authority over SGMA enforcement.

Anona also noted that early 2022 will keep the Committee members busy with Annual Report development, anticipated responses to DWR comments on the submitted GSP, and new grant applications for the SGMA and IRWM programs.

b. Tracking Tools, Dutton

Anona reminded the Committees to complete the latest Tracking Tools for their GSA or member agency. Tracking Tool check-in meetings will be scheduled with Committee members to review monitoring and implementation efforts and to discuss experiences with the current dry year conditions.

c. Water Quality Monitoring Activities and Status, Dumas

Leslie Dumas/W&C reminded the Committees that the water quality monitoring window closes August 31st. Leslie requested that representatives share sample results with SLDMWA and Woodard & Curran staff once the agency receives the laboratory report.

d. Interconnected Surface Water Monitoring Network Development, Dumas

The Committees discussed identifying new sites for interconnected surface water monitoring, including the option of using future SGMA or IRWM funding to identify potential sites for nested well construction. Leslie noted that Technical Support Services (TSS) funding was used for one nested well site in the Central GSA, but that the TSS timing is delayed relative to the Northern and Central Regions' need for expanding the monitoring network. Leslie will coordinate with Vince Lucchesi/PID, Bobby Pierce/WSID, and Walt Ward/Stanislaus to identify potential sites for construction of new nested wells.

11. Committees to Discuss Special Projects

a. Well Census and Inventory Project, Howard/O'Leary

Claire Howard/P&P noted that final check-in meetings with GSAs and member agencies in the Northern and Central Regions are being scheduled to review well location and construction data compiled by Gavin O'Leary.

b. Subbasin Subsidence Characterization Study and Project Feasibility Determination, Brodie

John Brodie/SLDMWA reminded the Committees that the GSI Environmental, Inc. (GSI) team leading the Subbasin's subsidence characterization study has requested any available pumping data, particularly from wells screened in the lower aquifer, to bolster their subsidence review.

12. Committees to Discuss Inter-basin Coordination Update, Brodie/Montgomery/Lucchesi

a. Report on August 6th and 20th 2021 Meetings

Vince Lucchesi/PID and John Brodie/SLDMWA shared updates from recent Facilitation Support Services (FSS) inter-basin coordination meetings held with representatives from the Chowchilla, Madera, and Merced Subbasins and facilitated by a Stantec team. The regional area of focus for subsidence between these subbasins' borders is being finalized. Vince noted that Madera and Chowchilla Subbasins are taking a wait-and-see approach with subsidence, rather than proactively anticipating and addressing subsidence concerns. Representatives from the Delta-Mendota Subbasin are concerned about this approach because of potential ongoing regional subsidence impacts. Vince noted that the Northern and Central Regions can be used as an example for a potential path forward for the Chowchilla and Madera Subbasins for the Regions' efforts identifying well locations and extent of subsidence.

The next inter-basin coordination meetings are scheduled for September 1st and 15th.

13. Committees to Discuss Potential Funding Opportunities, Brodie

John Brodie/SLDMWA shared a summary of upcoming funding opportunities:

- DWR is offering a non-competitive funding program for critically-overdrafted subbasins. This program is anticipated to open early 2022.
- DWR is also offering a Small Community Drought Program, which is open for applications until December 29, 2023.
- Proposition 1 - Round 2 grant funding for the IRWM program will open in Spring 2022.
- USBR grants including the Water and Energy Efficiency Grant (WEEG) and Environmental Water Resources (EWR) are open until later this fall. WEEG requires a 50% match and the application deadline is November 3, 2021. The EWR grant requires a 25% match and is open until December 9, 2021.

John requested that Committee members add and update prospective projects in the Opti database.

14. Next Steps

- The Committees provided direction to John Brodie/SLDMWA to develop a draft comment letter in response to the Tracy Subbasin's draft GSP for submission by the September 9th comment window deadline. John will circulate the draft letter for feedback and confirmation with the Committees prior to the Committee chairs signing the letter.
- Committee members are requested to update project details in the Opti database (https://opti.woodardcurran.com/irwm/wsj/login.php)
- Committee members are requested to complete their agency's Tracking Tool and provide availability to schedule a Tracking Tool check-in meeting.
- The water quality monitoring window closes August 31st. Committee representatives are reminded to share laboratory reports and chain of custody documentation once received.
- Additional meetings are being scheduled with agency representatives and Gavin O'Leary/P&P to review well census data results.
- The next inter-basin coordination meetings are scheduled for September 1st and 15th.

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

No topics were discussed under this item.

16. Future Meetings

a. Thursday, September 23rd, 2021 at 10:00 AM
b. Thursday, October 28th, 2021 at 10:00 AM
c. November & December, 2021 (TBD)

17. Conference with Legal Counsel – Existing Litigation

The Committees 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].

18. Report Out of Closed Session

No reportable action was taken in closed session.

19. ADJOURNMENT

Aaron Barcellos/Pacheco adjourned the meeting at 12:12 PM.

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2021 - FEBRUARY 28, 2022
SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT
ACTIVITY AGREEMENTS BUDGET TO ACTUAL
NORTHERN DELTA-MENDOTA REGION (FUND 64)

Report Period 3/1/21 - 7/31/21
N/C Meeting 9/23/21

			Allocation by Participants								
REVENUES	Annual Budget	Total Revenues	Patterson ID 12.0587%	West Stanislaus ID 14.8986%	Del Puerto WD 32.1498%	City of Patterson 7.4186%	Merced County 1.6737%	Stanislaus County 31.8006%			
Membership Dues	$ 649,812	$ 324,906	$ 39,180	$ 48,407	$ 104,457	$ 24,104	$ 5,438	$ 103,322			
Total Revenues	$ 649,812	$ 324,906	$ 39,180	$ 48,407	$ 104,457	$ 24,104	$ 5,438	$ 103,322			
EXPENDITURES	Annual Budget	Total Expenses	Patterson ID 12.0587%	West Stanislaus ID 14.8986%	Del Puerto WD 32.1498%	City of Patterson 7.4186%	Merced County 1.6737%	Stanislaus County 31.8006%	Budget Remaining	% of Amt Remaining	Expenses Through
Legal:											
Outside Counsel	$ 23,040	$ 9,962	$ 1,201	$ 1,484	$ 3,203	$ 739	$ 167	$ 3,168	$ 13,078	57%	6/30/21
Other Professional Services:											
Contracts	$ 505,642	$ 63,497	$ 7,657	$ 9,460	$ 20,414	$ 4,711	$ 1,063	$ 20,192	$ 442,145	87%	7/31/21
Other:											
Executive Director	$ 330	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 330	100%	
General Counsel	$ 5,100	$ 103	$ 12	$ 15	$ 33	$ 8	$ 2	$ 33	$ 4,997	98%	7/31/21
Water Policy Director	$ 2,708	$ 617	$ 74	$ 92	$ 198	$ 46	$ 10	$ 196	$ 2,091	77%	7/31/21
Water Resources Program Manager	$ 63,768	$ 19,151	$ 2,309	$ 2,853	$ 6,157	$ 1,421	$ 321	$ 6,090	$ 44,617	70%	7/31/21
Water Resources Coordinator	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	0%	
Accounting	$ 3,553	$ 799	$ 96	$ 119	$ 257	$ 59	$ 13	$ 254	$ 2,754	78%	7/31/21
Hydrotech 3	$ 25,071	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 25,071	100%	
Los Banos Administrative Staff	$ 750	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 750	100%	
License & Continuing Education	$ 250	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 250	100%	
Conferences & Training	$ 5,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 5,000	100%	
Travel/Mileage	$ 5,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 5,000	100%	
Group Meetings	$ 500	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 500	100%	
Telephone	$ 1,250	$ 174	$ 21	$ 26	$ 56	$ 13	$ 3	$ 55	$ 1,076	86%	6/30/21
Equipment and Tools	$ 4,175	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 4,175	100%	
Software	$ 3,675	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 3,675	100%	
Total Expenditures	$ 649,812	$ 94,303	$ 11,372	$ 14,050	$ 30,318	$ 6,996	$ 1,578	$ 29,989	$ 555,509	85%	
Fund 64 Excess/(Deficit) w/o Grant Reimbursement	$ -	$ 230,603	$ 27,808	$ 34,357	$ 74,138	$ 17,108	$ 3,860	$ 73,333			
Grant Reimbursements	Annual Budget	Total Revenues	Patterson ID 12.0587%	West Stanislaus ID 14.8986%	Del Puerto WD 32.1498%	City of Patterson 7.4186%	Merced County 1.6737%	Stanislaus County 31.8006%			
Grant Reimbursements	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Grant Retention	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Total Grant Reimbursements	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Fund 64 Excess/(Deficit) with Grant Reimbursement	$ -	$ 230,603	$ 27,808	$ 34,357	$ 74,138	$ 17,108	$ 3,860	$ 73,333			

Subject to Rounding

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2021 - FEBRUARY 28, 2022
SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT
ACTIVITY AGREEMENTS BUDGET TO ACTUAL
CENTRAL DELTA-MENDOTA REGION (FUND 65)

Report Period 3/1/21 - 7/31/21
N/C Meeting 9/23/21

			Allocation by Participants														
REVENUES	Annual Budget	Total Revenues	Panoche WD 8.3333%	San Luis WD 8.3333%	Eagle Field WD 8.3333%	Fresno Slough WD 8.3333%	Mercy Springs WD 8.3333%	Oro Loma WD 8.3333%	Pacheco WD 8.3333%	Tranquillity WD 8.3333%	Fresno County 8.3333%	Merced County 8.3333%	Santa Nella County WD 8.3333%	Widren GSA 8.3333%			
Membership Dues	$ 649,812	$ 324,906	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076			
Total Revenues	$ 649,812	$ 324,906	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076	$ 27,076			
EXPENDITURES	Annual Budget	Total Expenses	Panoche WD 8.3333%	San Luis WD 8.3333%	Eagle Field WD 8.3333%	Fresno Slough WD 8.3333%	Mercy Springs WD 8.3333%	Oro Loma WD 8.3333%	Pacheco WD 8.3333%	Tranquillity WD 8.3333%	Fresno County 8.3333%	Merced County 8.3333%	Santa Nella County WD 8.3333%	Widren GSA 8.3333%	Budget Remaining	% of Amt Remaining	Expenses Through
Legal:																	
Outside Counsel	$ 23,040	$ 13,526	$ 1,127	$ 1,127	$ 1,127	$ 1,127	$ 1,127	$ 1,127	$ 1,127	$ 1,127	$ 1,127	$ 1,127	$ 1,127	$ 1,127	$ 9,514	41%	6/30/21
Other Professional Services:																	
Contracts	$ 505,642	$ 67,144	$ 5,595	$ 5,595	$ 5,595	$ 5,595	$ 5,595	$ 5,595	$ 5,595	$ 5,595	$ 5,595	$ 5,595	$ 5,595	$ 5,595	$ 438,498	87%	7/31/21
Other:																	
Executive Director	$ 330	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 330	100%	
General Counsel	$ 5,099	$ 103	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 4,996	98%	7/31/21
Water Policy Director	$ 2,709	$ 562	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 2,147	79%	7/31/21
Water Resources Program Manager	$ 63,768	$ 19,102	$ 1,592	$ 1,592	$ 1,592	$ 1,592	$ 1,592	$ 1,592	$ 1,592	$ 1,592	$ 1,592	$ 1,592	$ 1,592	$ 1,592	$ 44,666	70%	7/31/21
Water Resources Coordinator	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	0%	
Accounting	$ 3,553	$ 799	$ 67	$ 67	$ 67	$ 67	$ 67	$ 67	$ 67	$ 67	$ 67	$ 67	$ 67	$ 67	$ 2,754	78%	7/31/21
Hydrotech 3	$ 25,071	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 25,071	100%	
Los Banos Administrative Staff	$ 750	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 750	100%	
License & Continuing Education	$ 250	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 250	100%	
Conferences & Training	$ 5,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 5,000	100%	
Travel/Mileage	$ 5,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 5,000	100%	
Group Meetings	$ 500	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 500	100%	
Telephone	$ 1,250	$ 174	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 1,076	86%	6/30/21
Equipment and Tools	$ 4,175	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 4,175	100%	
Software	$ 3,675	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 3,675	100%	
Total Expenditures	$ 649,812	$ 101,410	$ 8,451	$ 8,451	$ 8,451	$ 8,451	$ 8,451	$ 8,451	$ 8,451	$ 8,451	$ 8,451	$ 8,451	$ 8,451	$ 8,451	$ 548,402	84%	
Fund 65 Excess/(Deficit) w/o Grant Reimbursement	$ -	$ 223,496	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625			
Grant Reimbursements	Annual Budget	Total Revenues	Panoche WD 8.3333%	San Luis WD 8.3333%	Eagle Field WD 8.3333%	Fresno Slough WD 8.3333%	Mercy Springs WD 8.3333%	Oro Loma WD 8.3333%	Pacheco WD 8.3333%	Tranquillity WD 8.3333%	Fresno County 8.3333%	Merced County 8.3333%	Santa Nella County WD 8.3333%	Widren GSA 8.3333%			
Grant Reimbursements	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Grant Retention	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Total Revenues	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Fund 65 Excess/(Deficit) with Grant Reimbursement	$ -	$ 223,496	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625	$ 18,625			

Subject to Rounding

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)*

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

- *"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.

DRAFT GROUNDWATER MANAGEMENT PRINCIPLES & STRATEGIES TO MONITOR, ANALYZE & MINIMIZE IMPACTS TO DRINKING WATER WELLS:

A Framework for State Action to Support Drought Resilient Communities

PREAMBLE

As California's climate conditions continue to intensify and drought periods become more frequent and severe, the State acknowledges that less snowpack, precipitation, and surface water are leading to an increased reliance on groundwater. However, our groundwater resources in some areas of California have been overdrafted for decades, where many users, including agriculture, business, people, and the natural environment, rely on groundwater. Rural communities that are highly dependent on groundwater for drinking water typically rely on wells located in the shallow portions of groundwater aquifers, increasing exposure to potential impacts from intensifying changes in climate and groundwater use. Such circumstances can leave too many Californians with dry wells and few options for identifying alternative water sources. These principles and strategies provide a framework to guide State action, including immediate and long-term drought-related groundwater management actions by the California Department of Water Resources (DWR) and the State Water Resources Control Board (Water Board). Taking these actions can improve the water supply reliability of many Californians and communities who use groundwater wells for drinking water and household purposes now and into the future.

The State has experienced several drought cycles in the last decade. As documented in the most up-to-date statewide groundwater report – California's Groundwater (Bulletin 118) published by DWR and the recent Drinking Water Needs Assessment authored by the Water Board, the following conditions provide a clear need for developing these drinking water well principles and strategies:

- Droughts are extreme and climate change is exacerbating drought conditions to be more frequent and severe.

- Groundwater acts as a drought buffer and helps lessen the water supply impacts of our changing climate – groundwater provided nearly 60 percent of the State's total water supply in 2015 during the peak of the 2012 to 2016 drought.

- Approximately 82 percent of Californians – 33 million people – rely on groundwater for some portion of their drinking water or other household uses and nearly six million Californians are entirely dependent on groundwater for drinking water supplies.

- Nearly 1.5 million Californians rely on domestic wells and one-third of community water systems rely on only one well for drinking water and other potable uses.

- Approximately 53 percent of domestic wells are found in non-basin (fractured rock) areas, outside of the alluvial groundwater basins.

- The drinking water needs of some communities have historically not been prioritized, in part because members of these communities have sometimes been excluded from decision-making roles or other forms of participation on the basis of land tenure, property size, race, language, or other factors.

- Some communities where drought threatens drinking water have also historically experienced higher environmental burdens and now are among the most vulnerable to pollution and climate impacts.

- An estimated 3,500 domestic wells in the San Joaquin Valley, and hundreds more in the rest of the state, went dry leaving households and communities without water during the 2012 to 2016 drought. Based on climate projections and continued groundwater overdraft and unmanaged groundwater extractions, more wells are anticipated to go dry in certain areas.

- It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. Safe and reliable water is critical to human health.

For the purposes of this document drinking water well users are identified as d*omestic well owners or individuals, tribal governments, or water systems that use wells for drinking water needs.*

BACKGROUND

On April 21, 2021, Governor Newsom signed an Emergency Proclamation and declared a State of Emergency for certain parts of California where record drought conditions continued to worsen after two consecutive dry years. The Emergency Proclamation ordered various State actions, including Action 11:

> To ensure the potential impacts of drought on communities are anticipated and proactively addressed, the Department of Water Resources, in coordination with the Water Board, shall develop groundwater management principles and strategies to monitor, analyze, and minimize impacts to drinking water wells.

The DWR[1] and Water Board [2] stand strongly committed to the Human Right to Water – that all Californians have a right to safe, clean, affordable, and accessible water, including those who rely on groundwater for drinking water and household purposes.

The following principles and strategies were developed in response to the Governor's directive and build upon the State's drought response, as well as long-term water management efforts, to deliver solutions to support groundwater-dependent communities to ensure that the potential impacts of drought are anticipated and proactively addressed. Existing programs that complement this framework and are integrated in the strategies include:

- The Sustainable Groundwater Management Act (SGMA)
- The Safe and Affordable Funding for Equity and Resilience (SAFER) Program
- Water Conservation and Drought Planning (AB 1668 and SB 606, 2018)
- Irrigated Lands Regulatory Program (ILRP)
- Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS)

While these State programs provide DWR and the Water Board authorities to support local water management improvements, there are some challenges that cannot be solved by existing State regulatory and funding programs. For example, counties have authority over well permitting and local land use and groundwater sustainability agencies and water systems monitor conditions and manage water resources locally. Further aligning State programs, improving local agency coordination, and addressing data gaps are included in the strategies presented below to help anticipate and proactively address drought impacts on communities.

The following principles and strategies provide a framework for State actions to continue anticipating impacts and enhancing drought management efforts. Additional Executive action, legislation, funding, and guidance may be required to fully implement these strategies.

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[1] DWR formally adopted a Human Right to Water (HRTW) Policy in its Department Administrative Manual, which outlines how the HRTW should be included in DWR decision-making, program activities, and public engagement.

[2] The Water Board adopted a HRTW Resolution, recognizing HRTW as a core value and directing its implementation across programs and activities. The Water Board is also currently drafting a Racial Equity Resolution.

PRINCIPLES & STRATEGIES

1. **Achieve Drinking Water Resilience:** Implement ongoing drought planning and responses and other groundwater management programs to effectuate necessary changes with the goal to achieve drought resilience for drinking water well users.

1.1 Formalize and regularly convene an inter-agency drinking water well work team among state agencies, including DWR, the Water Board and other appropriate state agencies, to provide drought assistance.

1.2 Coordinate available assistance from federal agencies and work with the Governor's Office of Emergency Services and the local Offices of Emergency Services within county jurisdictions to provide drinking water well protections and relief through emergency funding, loans, grants, and other assistance programs.

1.3 Engage with counties and water systems to complete drought assessments and water shortage contingency plans in alignment with the 2018 Water Conservation and Drought Planning legislation, analyzing drought risks for drinking water well users, and encourage alignment with other local hazard mitigation plans (LHMP) and Emergency Operations Plans.

1.4 Engage with local agencies and non-governmental organizations (NGOs) to spotlight best practices of drought management efforts that support drinking water well users.

1.5 Continue long-term groundwater sustainability planning and implementation to minimize the impacts of future droughts, through the implementation of SGMA.

1.6 Continue providing assistance, support, and oversight through state drinking water and water quality programs and continue considering, where feasible and appropriate, consolidation and water partnerships to develop technical, managerial, and financial capacity of water systems and communities.

2. **Integrate Equity:** Recognize equity needs to be integrated in drought-related planning processes to inform outcomes; Ensure there is equitable access to available drought assistance where barriers may exist for drinking water well users.

2.1 Broadly distribute educational materials and comprehensive information on management and well maintenance responsibilities, potential drought risks associated with drinking water wells, and funding and assistance for drinking water well users to be able to make informed decisions regarding well infrastructure.

2.2 Develop programs to support and protect the reliability of wells or facilitation of interties, when feasible and appropriate.

2.3 Create flexibility for groundwater trading to occur within basins with appropriate safeguards for drinking water well users to support a safe and reliable water supply.

2.4 Work with relevant state agencies to develop guidance for counties to avoid the indiscriminate or retaliatory red tagging of homes based on prior water shortages, dry wells, or water quality contamination, without first considering the impacts to drinking water well users.

2.5 Provide guidance to local agencies on how to engage community members in local groundwater decision-making and solution-development and track improvements over time.

2.6 Use common or preferred platforms for public meetings at preferred times, when feasible, to improve communication on available State, federal and local planning and assistance to drinking water well users.

2.7 Continue to provide translation services, as appropriate, to empower communities to engage in their spoken language during local decision-making processes.

2.8 Apply the "polluter pays" principle, so that the costs of solutions that benefit drinking water well users don't fall on those users but fall on the parties that have responsibility for the vulnerabilities, to the degree possible or appropriate.

2.9 Align the use of different state funding programs and local fee authorities to maximize support for drinking water well users.

3. Address Underlying Challenges: Deliver targeted drought assistance by addressing the underlying challenges drinking water well users face to provide near-term relief, resolve fundamental issues, and anticipate and mitigate future drought impacts.

3.1 **Improve Procurement**: Improve contracting and procurement processes to assist with supply chain challenges to repair or rehabilitate dry wells, ensuring pumps, tanks, and drilling contractors are available in times of emergency response.

3.2 **Efficient Water Use:** Encourage counties to establish ordinances and requirements in areas not served by a water system to further address water use restriction needs and define appropriate water use during droughts; coordinate with local agencies to identify and enforce where there are inappropriate uses of groundwater.

3.3 **Coordinated Land Use Planning**: Engage with the Office of Planning and Research, counties, groundwater sustainability agencies (GSAs), and water agencies to align land use planning in general plans and groundwater sustainability planning efforts to ensure a reliable water supply for drinking water well users as land use changes occur.

3.4 **Informed Well Permitting**: Engage with relevant land use and county environmental health divisions, and groundwater sustainability agencies to develop guidance for how local agencies can avoid water supply or water quality issues when permitting new wells or new housing development.

3.5 **State Program Alignment**: Provide guidance to drinking water well users that recognizes the unique parallels between state drinking water and groundwater regulatory and funding programs and further align state efforts to ensure water supply and water quality impacts on drinking water well users are addressed.

3.6 **Energy Incentives**: Work with state energy agencies and other entities to further understand how groundwater management and pumping practices may impact drinking water well users in shallow aquifers that rely on groundwater and provide incentives for operating industrial or agricultural wells in ways that do not interfere with drinking water wells, regardless of energy demand management practices.

3.7 **Sustainable Land Use Practices**: Work with the California Department of Food and Agriculture to identify guidance on crop conversion, and farming and land use practices that may impact groundwater conditions and drinking water well users.

3.8 **Economic Development:** Provide assistance in partnership with other state agencies where there may be potential economic impacts to neighboring communities and drinking water well users.

4. Lead with Best Available Data: Prioritize the alignment, centralization, and accessibility of available well data and information to clearly identify emerging and existing groundwater and drinking water issues for improved drought management.

4.1 Improve data acquisition to monitor groundwater level and water quality conditions year-round to track current drought impacts and identify hot spot drought areas to help direct funding to local entities or non-governmental organizations to minimize drought impacts.

4.2 Promote the metering of wells or use of evapotranspiration data to more accurately capture the use of groundwater to improve long-term groundwater management and to safeguard drinking water well users by tracking real-time water use.

4.3 Develop a pilot program to work with local entities to publicly disclose well and water quality information when land or property is transferred.

4.4 Develop an information management system that builds off of existing platforms to inventory and centralize a statewide census of active well information.

4.5 Increase access to and provide user-friendly guidance on data platforms and datasets that are most relevant for drinking water well users to ensure access to

available information, including data on well infrastructure, water levels, water quality, and areas of exceedances of drinking water standards, including the high risk aquifer maps and needs assessment developed under the SAFER Program.

4.6 Encourage the increased frequency of groundwater level monitoring within existing wells and provide additional guidance and support to groundwater sustainability agencies to enhance the density of groundwater monitoring networks to benefit drinking water well users.

4.7 Encourage groundwater sustainability agencies and counties to work with drinking water well users to use existing wells as part of monitoring networks to collect relevant data.

5. **Build Trusted Relationships:** Emphasize that prioritizing and building trusted relationships with drinking water well users create opportunities for effective coordination, communication, and decision-making.

5.1 Recognize community members as experts about their own community and encourage opportunities for drinking water well users to meaningfully engage in the development of solutions.

5.2 Partner with tribal governments, non-governmental organizations, and local agencies to identify operational skill gaps, build capacity, and provide relevant training and technical assistance to support drinking water well users in both alluvial basin and fractured rock, non-basin areas.

5.3 Encourage opportunities for drinking water well users to participate in mutual aid organizations, such as California Water/Wastewater Agency Response Network (CALWARN), to have access to technical assistance and emergency water operators, in particular for tribal governments and small water systems that may have limited managerial resources.

5.4 Provide opportunities to engage government to government with tribes and with the federal Indian Health Services in drought preparedness, management, and emergency response efforts to address underlying challenges.

5.5 Employ and promote best practices for public engagement when working with communities and drinking water well users.

5.6 Engage with drinking water well users on training efforts to understand how to measure water levels and test water quality.

6. **Implement Lasting Solutions:** Recognize that there are no one-size-fits-all solutions to address drinking water well challenges and that solutions need to be specific, effective, and lasting with clear commitments to engage, empower, and support drinking water well users.

6.1 Deploy funding incentives to local agencies and counties to coordinate with tribal governments, underrepresented communities, and other non-governmental organizations to mitigate known violations of drinking water standards, further degradation of water quality, or dewatering of drinking water wells.

6.2 Develop guidance for local agencies in partnership with NGOs to collaborate on mitigation strategies to offset impacts of groundwater pumping and management on drinking water well users.

6.3 Report on progress being made to manage groundwater sustainably through existing state regulatory programs, including SAFER, SGMA, CV-SALTS, IRLP, and other pollution prevention efforts, including programs under the federal Clean Water Act and the state Porter-Cologne Water Quality Control Act.

6.4 Encourage regionalization and consolidation of drinking water systems as a potential solution to avoid future impacts and improve economies of scale to provide a more resilient water supply for drinking water well users.

6.5 Promote tools that identify communities and drinking water well users in need of solutions to help prioritize funding, such as the Drinking Water Needs Assessment under the SAFER Program.

6.6 Pilot alternative water supply projects, such as regional recycled water projects, for small communities reliant on wells for drinking water.

6.7 Work with county representatives to ensure consistency and improve the identification, reporting, and proper decommissioning of abandoned drinking water wells to prevent the potential spread of pollution and water quality contamination.

6.8 Promote the availability of drinking water and water rights data to assess the feasibility of recharge projects near shallow aquifers to benefit drinking water well users.

6.9 Incentivize recharge projects designed to improve conditions or protect drinking water well users where there are emerging or existing hot spots where drinking water wells are impacted by drought through streamlined permitting processes or other appropriate measures.

GLOSSARY

Drinking water well users – for the purposes of this document drinking water well users are identified as domestic well owners or individuals, tribal governments, or water systems that use wells for drinking water needs

Community water systems – means a public water system that serves at least 15 service connections used by yearlong residents or regularly serves at least 25 yearlong residents of the area served by the system, as defined in Health and Safety Code 116275(i)

Public water systems – means a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year (Health and Safety Code 116275(h))

Small community water system – means a community water system that serves no more than 3,300 service connections or a yearlong population of no more than 10,000 persons (Health and Safety Code 116275(z))

Tribal governments – includes California Native American tribe or State Indian tribes defined in Water Code §79712(a) as Indigenous Communities of California, which are on the contact list maintained by the Native American Heritage Commission, including those that are federally non-recognized and federally recognized, and those with allotment lands, regardless of whether they own those lands

NORTHERN & CENTRAL DELTA-MENDOTA

September 9, 2021

Matt Zidar
San Joaquin County
1810 E. Hazelton Avenue
Stockton, CA 95201

Re: Northern and Central Delta-Mendota Groundwater Sustainability Agency (GSA) Management Committees Comments on the Draft Tracy Subbasin Groundwater Sustainability Plan

Dear Mr. Zidar,

Representatives from the Northern and Central Delta-Mendota Region GSA Management Committees (Management Committees) have coordinated in preparing this comment letter on the draft Tracy Subbasin Groundwater Sustainability Plan (Tracy GSP). Members of the Management Committees collaborated to develop and submit the Northern & Central Delta-Mendota Region GSP (NCDM GSP), which was submitted as a separate GSP, but in coordination with five additional GSPs in the Delta-Mendota Subbasin in January 2020. The NCDM GSP Region borders the southern portion of the Tracy Subbasin, so groundwater management activities in both the Delta-Mendota and Tracy subbasins are critical to successful long-term management and sustainability.

Representatives from GSAs and consultant staff for both the Delta-Mendota and Tracy subbasins, along with staff from the San Luis & Delta-Mendota Water Authority (SLDMWA) representing NCDM GSP, have participated in public workshops and reviewed the Tracy GSP and meeting materials.

Additionally, representatives from both GSPs have previously met to discuss monitoring networks along the shared subbasin boundary. Building on past coordination and in anticipation of ongoing shared interest in long-term groundwater sustainability, representatives from the Management Committees have reviewed content in the Tracy GSP that references the NCDM GSP or other Delta-Mendota Subbasin activities.

The following areas were identified needing additional coordination and cooperation between our subbasins to further our shared interest in regional groundwater sustainability:

- Use of NCDM GSP implementation data to close the gap in water level Measurable Objectives and Minimum Thresholds for representative monitoring network wells located along the subbasin boundary.
- Jointly analyze data on subsurface groundwater exchanges rather than rely on modeling to better inform assumptions within the Tracy GSP draft on Water Budget (Section 7.7), Chronic

Lowering of Groundwater Levels (Section 9.3.1), and Degraded Water Quality (Section 9.6.5) as they relate to the Delta-Mendota Subbasin.

- Table 8.4 – Data Gap Monitoring Wells highlights several proposed monitoring wells that are of interest to the Management Committees due to their location near the subbasin boundary (also depicted in Figures 8-1 and 8-2). Knowledge of these sites' water levels and quality will aid the NCDM GSP's understanding of subsurface boundary flows and regional water quality. Sharing available data from well construction and monitoring will support shared efforts between the Tracy GSP and NCDM GSP.
- We feel that there is a general perception that actions in neighboring subbasins have a greater influence on some general conditions and sustainable management criteria in the Tracy Subbasin than activities within the Tracy Subbasin itself, admittedly without conclusive data to substantiate those inferences. We disagree with that perception.
- The Management Committees are interested in sharing information regarding future development along the subbasin boundary that may affect groundwater levels, quality, and access in the NCDM GSP area. Members are interested in ongoing communication regarding development and well permitting activity and seek ongoing awareness of activities that may affect the NCDM GSP's successful implementation.

We look forward to working with the GSAs in the Tracy Subbasin to further our shared interest in regional groundwater sustainability.

Sincerely,

Bobby Pierce
Northern Management Committee Chairperson

Aaron Barcellos
Central Management Committee Chairperson

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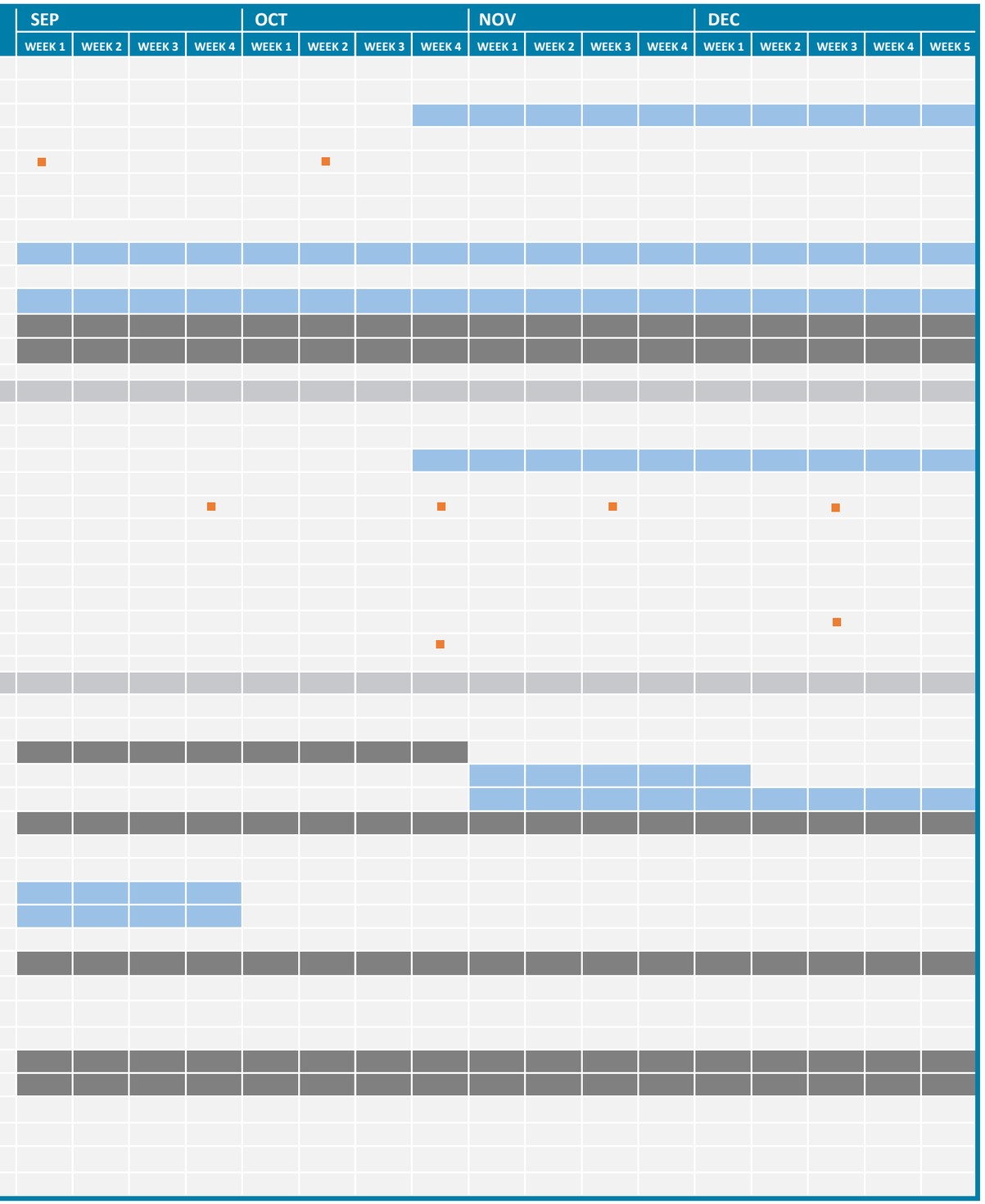
GSP Implementation Schedule

Northern & Central Delta-Mendota GSP Region

3-MONTH LOOK-AHEAD SCHEDULE

TASK	RESPONSIBLE PARTY	START	END
BASIN-SCALE COORDINATION			
Annual Report			
WY2021 DM Consolidated Annual Report	W&C / Basin GSAs	10/20/21	4/1/22
Intra-Basin Coordination			
Coordination Committee	Basin GSAs	Quarterly	
DM Technical Working Group	Basin GSAs	As-needed	
DMS Working Group	Basin GSAs	As-needed	
Inter-Basin Coordination			
Inter-Basin Coordination Meetings	Basin GSAs / Stantec	6/1/20	12/31/21
Prop 68 Coordination			
Grant Administration[a]	WSID / W&C	6/1/20	4/1/22
Well Census and Inventory	Basin GSAs / P&P	7/15/20	12/31/21
Subsidence Characterization and Feasibility Study[a]	Basin GSAs / GSI	12/21/20	4/1/22
N-C REGION COORDINATION / ADMINISTRATION			
Annual Report			
WY2021 NCDM Annual Report	W&C / NC GSAs	10/20/21	4/1/22
N-C Coordination Meetings			
Northern and Central Region Mngmt Committees Meetings	GSAs	Monthly	
Northern Region Management Committee Meetings	GSAs	As-needed	
Central Region Management Committee Meetings	GSAs	As-needed	
Technical/Finance Working Group Meetings	GSAs	TBD	
Quarterly GSP Progress Checks			
GSP Implementation Progress Reports (Tracking Tools)	GSAs	Tri-Annually	
Quarterly GSP Implementation Update Reports	W&C	Quarterly	
N-C REGION GSP IMPLEMENTATION			
Water Level Monitoring			
Collect Fall Water Level Data	GSAs / SLDMWA	9/1/21	10/31/21
Data QA/QC	GSAs / W&C	10/31/21	11/30/21
Data Consolidation/Upload to DMS/SGMA Portal	GSAs / W&C	10/31/21	12/31/21
Install New Monitoring Wells	GSAs	7/1/20	3/31/22
Water Quality Monitoring			
Collect Water Quality Data	GSAs	5/1/21	8/31/21
Data QA/QC	GSAs / W&C	7/31/21	9/30/21
Data Consolidation/Upload to DMS	GSAs / W&C	7/31/21	9/30/21
Interconnected Surface Water Monitoring			
Install/Identify New Monitoring Wells	WSID / PID / NWDM	3/1/20	12/31/21
Meet with Adjoining GSP Groups	WSID / PID / NWDM	As-needed	
Projects[a]			
Los Banos Creek Recharge and Recovery Project	SLWD	PD Complete	TBD
Kaljian Drainwater Reuse Project	SLWD	3/1/20	12/31/25
Orestimba Creek Recharge and Recovery Project	DPWD	3/1/20	12/31/24
NVRRWP – Increased Modesto and Turlock Portions[b]	DPWD	Complete	
Percolation Ponds for Stormwater Capture and Recharge	City of Patterson	TBD	TBD
WSID Lateral 4-North Recapture and Recirculation Reservoir[c]	WSID	FS in 2021	TBD
Revision to TRID Lower Aquifer Pumping[d]	TRID	On-going	



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GSP Implementation Schedule

Northern & Central Delta-Mendota GSP Region

3-MONTH LOOK-AHEAD SCHEDULE

TASK	RESPONSIBLE PARTY	START	END	SEP				OCT				NOV				DEC				
				WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5
Management Actions[a]																				
Lower Aquifer Pumping Rules for Minimizing Subsidence	GSAs	6/25/20	12/31/22																	
Maximize Use of Other Water Supplies	GSAs	6/25/20	12/31/25																	
Increasing GSA Access to and Input on Well Permits	GSAs	6/11/20	12/31/21																	
Drought Contingency Planning in Urban Areas	GSAs	Complete																		
Fill Data Gaps	GSAs	2/1/20	12/31/25																	
Additional GSP Activities																				
USGS / Basin Model	USGS/USBR	3/1/20	12/31/21																	
Project Management and Communication	SLDMWA / EKI	3/1/20	2/28/22																	
As-Needed Technical Support	EKI / W&C	3/1/20	2/28/22																	

Abbreviations

DMS = Data Management System
DM = Delta Mendota
DPWD = Del Puerto Water District
EKI = EKI Environment & Water, Inc.
FS = Feasibility Study
GSA = Groundwater Sustainability Agency
GSP = Groundwater Sustainability Plan
NVRRWP = North Valley Regional Recycled Water Program
P&MA = Projects and Management Actions
PD = Preliminary Design
PID = Patterson Irrigation District
P&P = Provost & Pritchard
QA/QC = Quality Assurance/Quality Control
SLDMWA = San Luis & Delta-Mendota Water Authority
SLWD = San Luis Water District
TBD = to be determined
TRID = Tranquillity Irrigation District
USBR = United States Bureau of Reclamation
USGS = United States Geological Survey
W&C = Woodard & Curran
WSID = West Stanislaus Irrigation District
WY = Water Year

Notes

(a) Prop 68 Grant Coordination activities extend through 4/1/2022; Projects and Management Actions extend through 2025.
(b) Portion of project is complete. Increased supply of recycled water expected.
(c) Needs to be coordinated with Orestimba and Del Puerto Creek projects.
(d) In operation starting in 2017.