Delta-Mendota Subbasin
Special Joint Meeting of the Northern and Central
Delta-Mendota Region Management Committees, and
Central Delta-Mendota Region GSA Steering Committee

Thursday, May 2, 2019, 1:00 PM
SLDMWA Boardroom, 842 6th Street, Los Banos, CA

Meeting Minutes

Management and Steering Committee Members and Alternates Present

Northern DM Region Management Committee

Maria Encinas, Member; Fernando Ulloa, Alternate – City of Patterson
Walt Ward, Member – Stanislaus County
Bobby Pierce, Member – West Stanislaus Irrigation District
Lacey Kiriakou, Member – Merced County
Vince Lucchesi, Member – Patterson Irrigation District
Anthea Hansen, Member – Del Puerto Water District (Phone)

Central DM Region Management Committee

John Bennett, Member; Randy Miles, Alternate – Eagle Field Water District*
Aaron Barcellos, Member – Pacheco Water District*
Ben Fenters, Alternate – San Luis Water District*
Lacey Kiriakou, Member – Merced County
Augustine Ramirez, Alternate – Fresno County*
Amy Montgomery, Member – Santa Nella County Water District*
Valerie Kincaid, Alternate – Oro Loma Water District
Damian Aragona, Member – Widren Water District
Juan Cadena, Alternate – Mercy Springs/Pacheco* (Phone)
Scott Silveira, Member – Merced County* (Only on Central GSA Steering Committee)

*Indicates member/alternate of the Central DM GSA Steering Committee

Authority Representatives Present

Andrew Garcia
Seth Harris
Claire Howard - CivicSpark

Others Present

Joe Hopkins – Provost & Pritchard/Tranquillity Irrigation District

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Diane Rathmann – Panoche Water District
Leslie Dumas – Woodard & Curran
Callie Lindemann – Baker, Manock & Jensen
Lauren Layne – Baker, Manock & Jensen (Phone)

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

   Aaron Barcellos/Pacheco WD called the meeting to order at 1:05 PM.

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 at this time.

3. **Opportunity for Public Comment**

   No public comment was received.

4. **Committees to Consider Approval of North-Central GSP Group Monitoring Network and Authorize GSP Group Representatives' Votes at the Coordination Committee Level Consistent with the Committees' Directions, Dumas**

   The Committees reviewed a set of maps that indicate the location of monitoring network locations throughout the North-Central GSP region. The maps provided both upper and lower aquifer well locations for water level/water quality, surface water/groundwater interaction, and subsidence monitoring. Valerie Kincaid/Oro Loma WD expressed concern regarding the GSAs meeting compliance within their own minimum threshold and measurable objective values. The Committees approved the monitoring network maps with the opportunity to further refine and improve them. Walt Ward/Northwestern motioned for the Northern Management Committee and Vince Lucchesi/Patterson ID seconded; Ben Fenters/San Luis WD motioned for the Central Management Committee and Augie Ramirez/Fresno seconded.

5. **Committees to Consider Approval of North-Central GSP Group Sustainable Management Criteria and Authorize GSP Group Representatives' Votes at the Coordination Committee Level Consistent with the Committees' Directions, Dumas**

   The Committees reviewed a compiled set of sustainable management criteria for the North-Central GSP Group. Vince explained that he will provide updated information for the Notes section for the WSID/PID subregion following a conversation he had with Bobby Pierce/West Stanislaus ID.

   Leslie Dumas/Woodard & Curran provided an overview of the minimum thresholds and measurable objectives included in the sustainable management criteria table. For the water quality section, Leslie explained that the minimum threshold for each constituent was determined based on the maximum contaminant level (MCL) or current groundwater quality level, if the level exceeded the MCL as of December 2018. She noted that these criteria were set based on the process for anti-degradation policies and assimilative capacity. She noted that the undesirable result for water quality would be exceeding the primary MCL for public water systems based on three consecutive sampling events in non-drought years or degradation of current water quality where the current constituent level already exceeds the MCL. The

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Committees discussed linking sampling to water year type and varying sampling frequency related to drought and non-drought years.

For interconnected surface water, Leslie explained that the intent is to preserve the ability to divert off the San Joaquin River. She noted that a goal for the 5-Year Update in 2025 will involve improving the understanding of interconnected surface water criteria. Valerie Kincaid emphasized the use of "depletion" in the SGMA regulations. Lacey Kiriakou/Merced inquired about the confirmed analysis of reaches along the San Joaquin River. Leslie noted that the groundwater dependent ecosystem (GDE) metric in the undesirable result for interconnected surface water can be removed, and the language can focus more on horizontal gradients toward the river and discussing the depletion of this available water. Valerie explained that she wants the language for this section to connect to groundwater pumping. The Committees noted that they are concerned that the basins to the east of the San Joaquin River will also be facing SJR depletions due to pumping. Leslie confirmed that she will update the language for the undesirable result section for interconnected surface water.

The Committees briefly discussed the criteria for subsidence. They determined that Andrew, Leslie, and Valerie will work together to update the language for minimum thresholds and measurable objectives for this indicator.

For water level and change in storage, Leslie explained that the undesirable result is violation at 25% of monitoring wells over three consecutive monitoring events. Valerie noted that it may be beneficial to use different monitoring approaches for drought and non-drought years. She also explained that since water levels will be used as a proxy for change in storage, the criteria for each must match.

The Committees considered approval for the sustainable management criteria at this time, with the opportunity to further refine the criteria moving forward. Vince provided the motion for the Northern Management Committee and Walt seconded; Amy provided the motion for the Central Management Committee and Damian seconded.

6. **Committees to Discuss Labor Estimate and Scope of Work for GSP Implementation, Garcia**

Andrew introduced the labor estimate and scope of work for GSP implementation, and explained the importance of this discussion for shaping the Water Authority's and individuals GSAs' understanding of staffing needs moving forward. Walt requested an accompanying narrative that will further explain the survey responses that each GSA provided. Andrew confirmed that a memorandum is being finalized to accompany the updated scope of work and anticipated Authority involvement.

7. **Central GSA Steering Committee to Discuss Joint Powers Authority Agreement, Garcia**

Only the members of the Central GSA Steering Committee stayed to discuss the status of the Joint Powers Authority Agreement. The Northern and Central Management Committees meeting was adjourned.

The Central GSA Steering Committee members reviewed a draft JPA document prepared by Lacey Kiriakou, Augie Ramirez, the legal counsels for Merced and Fresno Counties, and Lauren Layne/Baker, Manock & Jensen, with review by other members. The Committee noted that Exhibit C must be updated with correct participation percentages to reflect the removal of Oro

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Loma Water District. Ben Fenters noted that for Section 5.3, adding language such as "as determined by the GSP."

The Committee discussed using "member contributions" instead of "fee" or "participation percentage" in the JPA language in Section 11.2. The Committee discussed resetting the contribution amount to reflect volumetric pumping. Andrew suggested incorporated language such as "may recalculate" in reference to the identified contribution amount to allow for an update to this contribution portion based on improved data once available. Ben suggested collecting enough data to know extraction rates by 2023 to develop a better understanding by 2025 for the 5-Year Update. The Committee discussed incorporating this timeline into the JPA agreement language.

The Committee also discussed an updated voting structure that matches the proposed member contributions based on volumetric pumping. Amy Montgomery expressed concern that this structure would create a power dynamic that would leave smaller agencies with no voting power. The Committee also noted concern of the timing of accepting a proposed voting restructure that would delay adoption of the JPA agreement relative to the GSP submission.

The Committee discussed aiming to finalize the language of the agreement by the end of May to allow for the counties to seek approval from their individual boards in June and July.

8. **Next Steps**
   - The monitoring network maps will continue to be refined.
   - The sustainable management criteria table will be updated based on input for language provided by the Committee members.
   - The Central GSA Steering Committee will continue to discuss the JPA agreement language and formation.

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

   No additional reports were discussed.

10. **ADJOURNMENT**

    The meeting was adjourned at 4:28 PM.

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Delta-Mendota Subbasin
Joint Meeting of the Northern and Central
Delta-Mendota Region Management Committees, and
Central Delta-Mendota Region GSA Steering Committee

Monday, June 3, 2019, 2:30 PM
SLDMWA Boardroom, 842 6th Street, Los Banos, CA

Meeting Minutes

Management Committee Members and Alternates Present

Northern DM Region Management Committee

Fernando Ulloa, Alternate – City of Patterson
Lacey Kiriakou, Member – Merced County
Adam Scheuber, Alternate – Del Puerto Water District
Vince Lucchesi, Member – Patterson Irrigation District
Bobby Pierce, Member – West Stanislaus Irrigation District
Walt Ward, Member – Stanislaus County (Phone)

Central DM Region Management Committee

Randy Miles, Alternate – Eagle Field Water District
Ben Fenters, Alternate – San Luis Water District
Augustine Ramirez, Alternate – Fresno County
Lacey Kiriakou, Member – Merced County
Aaron Barcellos, Member – Pacheco Water District
Amy Montgomery, Member – Santa Nella County Water District
Damian Aragona, Member – Widren Water District
Juan Cadena, Alternate – Mercy Springs/Pacheco Water Districts

Authority Representatives Present

Frances Mizuno
Federico Barajas
Scott Petersen
Becca Akroyd (Phone)
Lauren Neves
Joyce Machado
Andrew Garcia
Seth Harris
Claire Howard – CivicSpark

Others Present

Lauren Layne – Baker, Manock & Jensen

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Leslie Dumas – Woodard & Curran (Phone)
Christina Guzman – Fresno County (Phone)
Joe Hopkins – Provost & Pritchard/Tranquillity Irrigation District (Phone)
Diane Rathmann – Linneman Law

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

   Aaron Barcellos/Pacheco WD called the meeting to order at 2:31 PM.

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

   Andrew Garcia/SLDMWA amended agenda item 8d to "Round 3." The meeting minutes reflect this change.

3. **Opportunity for Public Comment**

   No public comment was received; no members of the public were present.

4. **Committees to Consider Approval of April 25, 2019 Meeting Minutes from Joint Meeting of the Northern and Central Delta-Mendota Management Committees and Central Delta-Mendota Region GSA Steering Committee Meeting Minutes**

   The Committees approved the meeting minutes from the April 25, 2019 Joint Meeting. Fernando Ulloa/City of Patterson motioned for approval on behalf of the Northern Management Committee, and Lacey Kiriakou/Merced seconded. Randy Miles/Eagle Field WD provided the motion for the Central Management Committee and Augie Ramirez/Fresno seconded.

5. **Committees to Consider Approval of April 2019 Budget-to-Actual Expenditures Report**

   Andrew presented the budget to actual report that contained information on SLDMWA expenses and consultant invoices to date. This month's report also included an accompanying summary memorandum describing the budget to actual report. The Committees noted that they liked the new accompanying summary as well as the overall chart, and prefer to have both addendums in future reports as well. The Committees approved the report. Bobby Pierce/WSID motioned for the Northern Management Committee, and Vince Lucchesi/Patterson ID seconded. Randy Miles/Eagle Field WD motioned for the Central Management Committee and Augie Ramirez/Fresno seconded the approval.

6. **Committees to Discuss Water Authority Scope of Work During GSP Implementation for the North-Central Region, Garcia**

   The Committees discussed the Water Authority scope of work for the North-Central Region and the Subbasin Coordinated Activities concurrently. The notes from this combined discussion are included under item #7.

7. **Committees to Discuss Water Authority Scope of Work During GSP Implementation for Subbasin Coordinated Activities, Garcia**

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Prior to delving into discussion of the Water Authority's role within GSP implementation, Andrew reminded the Committee members of the recently distributed drafts for the North-Central GSP and the upcoming deadlines to provide comments to the Woodard & Curran team. Vince reiterated the importance of reading these sections and the value of sharing comments prior to GSP adoption and submittal, and urged all members to contribute to this aspect of GSP development.

Andrew introduced the discussion topic and explained that the aim for this portion of the meeting is for the Committee members to provide input and direction for the Water Authority's role within GSP implementation. Federico Barajas/SLDMWA provided context on the Water Authority's recent adoption of strategic planning efforts. He explained that he and the other attending SLDMWA staff want to fully understand the role of SLDMWA within the Subbasin's SGMA efforts. He emphasized the role of SLDMWA as a reputable agency, and wants the Water Authority to be able to provide the North-Central GSP group and Subbasin Coordinated efforts the necessary support to make SGMA efforts successful. He asked the Committee members to share their hopes for the Water Authority's role within GSP implementation.

Aaron explained that the many moving parts within GSP development make it difficult to pinpoint what will be required for successful implementation. Frances Mizuno/SLDMWA explained that the Water Authority staff is interested in knowing the expected level of coordination for the North-Central GSP group.

Vince Lucchesi/PID and Bobby Pierce/WSID explained that they want to have a transitional year to get a better sense of GSP implementation. Their goal would be to use a transitional year to rely on consultants rather than encouraging the Water Authority to increase staffing without a sure understanding of implementation needs. Ben Fenters/SLWD explained that he wants to minimize costs, and is concerned about heavy reliance on consultants. Frances reminded the Committees of the time and management associated with hiring consultants. Valerie Kincaid/Oro Loma WD noted that they all are still anticipating a tremendous amount of coordination within the Delta-Mendota GSAs and with adjacent subbasins. She also explained that project coordination for identifying and implementing projects and management actions will be extensive.

Federico explained that the Water Authority is seeking further clarification as to the Committees' intent for SLDMWA's role in future coordination, especially prior to the start of the next fiscal year in March 2020. He further explained that this work is not the Water Authority's primary role, and that he is not advocating for SLDMWA to take on more involvement than is necessary. Valerie requested additional cost breakdown outlining division of work for SLDMWA staff and consultant time. Randy Miles/Eagle Field WD and Amy Montgomery/Santa Nella County WD emphasized their reliance on the Water Authority, and that as small agencies they do not have the capacity to complete SGMA-required work.

Augie Ramirez/Fresno and Lacey Kiriakou/Merced explained that they plan to lean on the Water Authority entirely for monitoring needs, and that they see benefit in having the continuity of SLDMWA involved in the implementation aspects of the GSP. Frances reminded the Committees of the importance of standardized monitoring processes if monitoring responsibilities are divided between multiple parties. She suggested that the Committees consider starting with SLDMWA taking on all monitoring responsibility for the first transition year. Aaron reiterated that the uncertainty of the implementation process makes it difficult for GSAs to know how best to proceed.

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Andrew will send a survey to the Northern and Central Management Committees to gather feedback on their intentions for monitoring responsibilities. Federico concluded the discussion by explaining that the agencies' input clarifies the structure of GSP implementation and the Water Authority's role.

8. **Committees to Discuss FY2020 Budget Status, Garcia**

   a. **Status of 2017 Round 1 Sustainable Groundwater Planning Grant Reimbursement**

Andrew explained that a reimbursement total of $443,361.60 is anticipated by the end of June. The Committees discussed their intent to maintain a fully transparent reimbursement process by paying back each GSA's cost and then starting the process again for the next round of grant reimbursements.

   b. **Expected Overrun to N/C GSP Preparation Contract Items and Coordinated Expenses Budget**

Andrew told the Committees that the cost overrun associated with the Northern & Central Delta-Mendota GSP preparation has resulted from delays and cost from all GSAs – no single agency was at fault for causing the overrun. He explained that the Water Authority and Woodard & Curran will work with DWR to seek an amendment to the grant agreement to get more Category 1 funding allocated to GSP preparation costs.

   c. **Public Employment – Replace CivicSpark Water Action Fellow**

The Committees discussed the idea of filling the role currently held by Claire Howard in the capacity of a CivicSpark fellow. Andrew explained that this would involve an increase in the North-Central GSP Group's budget, and that some of the time for this new role would cover work for the Coordination Committee as well. The Committee members responded positively to this idea. Andrew explained that he will look into the budget components of this employment opportunity and he will share it with the North and Central Management Committees along with additional budgetary information at the next meeting, scheduled for June 27th.

   d. **Grant Application Preparation and Round 3 of Prop 68 Sustainable Groundwater Planning Grant Funding**

The Committees discussed that the Proposal Solicitation Package (PSP) for Round 3 of Prop 68 Sustainable Groundwater Planning grant program is currently available for public comment and review until June 17th. Lacey Kiriakou/Merced explained that previous grant funding may count against the total funds that a group can receive in Round 3. Lacey explained that Merced County will be submitting a letter to DWR to accompany their comments on this aspect of the Round 3 Grant Funding by June 17th.

   e. **Budget and Approval for Other Individual Grant Applications**

Andrew noted that the Committees have the opportunity to build in budget for upcoming grant applications and review. He explained that the Water Authority could share upcoming grant opportunities and provide grant management support if the Committees see value in this support and in addressing budgetary considerations for this type of involvement. Bobby Pierce noted that West Stanislaus ID will seek its own grants for individual projects.

   f. **Individual Agency Projects and Budgets**

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Andrew explained that the Water Authority is planning to provide individual agencies specific support, especially for data collection and monitoring efforts, that doesn't apply to all GSAs. He noted that a payment structure will be used so that agencies receiving additional services from the Water Authority can pay separately from the standard North-Central GSP Group's dues. Andrew shared this update with the Committees to ensure continued transparency among the GSAs working with the Water Authority.

9. Committees to Discuss Preliminary GSP Implementation Policies, Dumas/Garcia

Andrew shared a preliminary list of policies and directives associated with GSP implementation. He noted that he is seeking greater input from GSAs, and asked the Committee members to review this list and provide additional feedback on their intent for policies associated with GSP implementation.

10. Next Steps

- All Committee members to review draft GSP sections prepared by Woodard & Curran
- Additional budget information for the North-Central GSP group will be shared during the June 27th North-Central GSP group meeting

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

Bobby noted that Andrew presented on a panel during a recent ACWA conference and did really well. Valerie shared that she was really appreciative of Federico and Frances attending, and other Committee members agreed.

12. ADJOURNMENT

The meeting was adjourned at 4:09 PM.

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SAN LUIS & DELTA-MENDOTA WATER AUTHORITY

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MEMO

TO:	North-Central Committee
FROM:	San Luis & Delta-Mendota Water Authority
PRESENTED BY:	Andrew Garcia, SLDMWA
SUBJECT:	Fiscal Year 2020 Budget to Actual
DATE:	June 27, 2019 Committee Meeting

Budgeted expenditures for FY 2020 for the overall North Central Committee is $683,798.
Budgeted portion of Coordinated FY2020 expenses for N/C Committee is $43,366
SLDMWA expenses through May 2019 are $60,880 or 8.4% of expenses.
Woodard & Curran invoices through April total $127,212 or 17.5% of expenses.
N/C portion of Coordinated expenses are $44,404 or 6.1%.
Budget remaining for FY 2020 is $494,668 or 68%.

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2019 - FEBRUARY 28, 2020
NORTHERN SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT (FUND 64)

North Central Meeting 06.27.19

EXPENDITURES		Annual Budget	Paid/ Pending	Additional Pending	Total Expenses	Amount Remaining	% of Amt Remaining	Expenses Through
Direct Expenditures:								
Legal:								
Outside Counsel		$ 32,400	$ 2,007	$ -	$ 2,007	$ 30,393	93.81%	5/31/19
Other Professional Services:								
Contracts		$ 139,472	$ 33,414	$ 30,192	$ 63,606	$ 75,867	54.40%	4/30/19
North Portion of Coordination Expenses		$ 21,683	$ 22,202	$ -	$ 22,202	$ (519)	-2.39%	4/30/19
Other:								
In-House Salary & Benefits		$ 134,745	$ 24,480	$ -	$ 24,480	$ 110,265	81.83%	5/31/19
Additional Admin Services	$ 1,912							
Other Services & Expenses		$ 23,150	$ 1,436	$ -	$ 1,436	$ 21,714	93.80%	5/31/19
License & Continuing Education		$ 250	$ 290	$ -	$ 290	$ (40)	-16.00%	5/31/19
Conferences & Training		$ 5,000	$ -	$ -	$ -	$ 5,000	100.00%	5/31/19
Travel/Mileage		$ 5,000	$ 261	$ -	$ 261	$ 4,739	94.79%	5/31/19
Group Meetings		$ 500	$ 175	$ -	$ 175	$ 325	64.91%	5/31/19
Telephone		$ 1,000	$ 427	$ -	$ 427	$ 573	0.00%	5/31/19
Total Direct Expenditures		$ 341,517	$ 84,693	$ 30,192	$ 114,884	$ 248,316	72.71%	
Administrative Expenditures		$ 382	$ -	$ -	$ -	$ 382	100.00%	5/31/19
Total Expenditures		$ 341,899	$ 84,693	$ 30,192	$ 114,884	$ 248,698	72.74%	

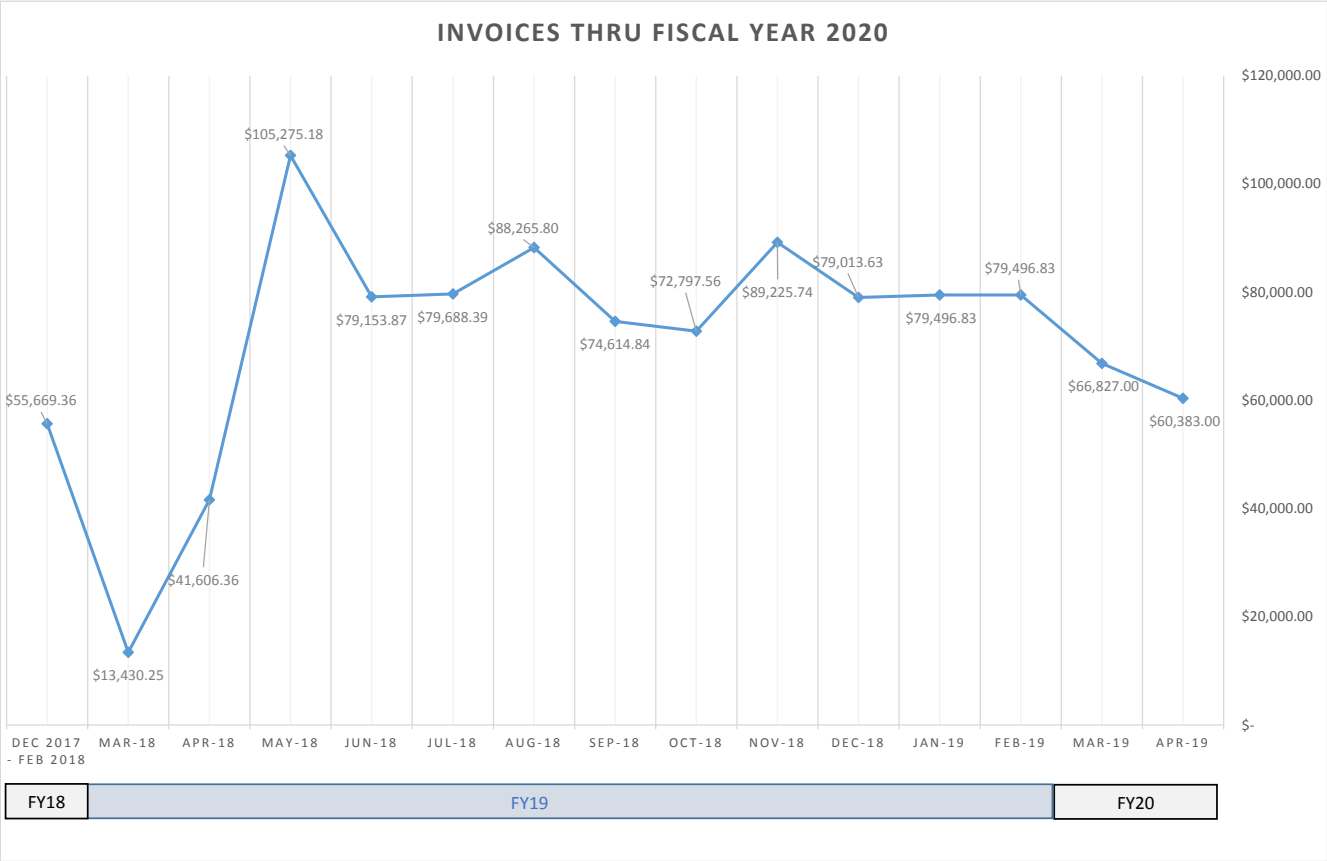
SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2019 - FEBRUARY 28, 2020
CENTRAL SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT (FUND 65)

North Central Meeting 06.27.19

EXPENDITURES		Annual Budget	Paid/ Pending	Additional Pending	Total Expenses	Amount Remaining	% of Amt Remaining	Expenses Through
Direct Expenditures:								
Legal:								
Outside Counsel		$ 32,400	$ 4,951	$ -	$ 4,951	$ 27,449	84.72%	5/31/19
Other Professional Services:								
Contracts		$ 139,472	$ 33,414	$ 30,192	$ 63,606	$ 75,866	54.40%	4/30/19
Central Portion of Coodination Expenses		*$ 21,683*	*$ 22,202*	*$ -*	*$ 22,202*	*$ (519)*	*-2.39%*	*4/30/19*
Other:								
In-House Salary & Benefits		$ 134,745	$ 24,415	$ -	$ 24,415	$ 110,330	81.88%	5/31/19
Additional Admin Services	$ 1,912							
Other Services & Expenses		$ 23,150	$ 1,443	$ -	$ 1,443	$ 21,707	93.77%	5/31/19
License & Continuing Education		$ 250	$ -	$ -	$ -	$ 250	100.00%	5/31/19
Conferences & Training		$ 5,000	$ 290	$ -	$ 290	$ 4,710	94.20%	5/31/19
Travel/Mileage		$ 5,000	$ 219	$ -	$ 219	$ 4,781	95.61%	5/31/19
Group Meetings		$ 500	$ 175	$ -	$ 175	$ 325	64.91%	5/31/19
Telephone		$ 1,000	$ 308	$ -	$ 308	$ 692	0.00%	5/31/19
Total Direct Expenditures		$ 363,200	$ 87,419	$ 30,192	$ 117,611	$ 245,589	67.62%	
Administrative Expenditures		$ 382	$ -	$ -	$ -	$ 382	100.00%	5/31/19
Total Expenditures		$ 363,582	$ 87,419	$ 30,192	$ 117,611	$ 245,971	67.65%	

North Central Management Committee Expenses

Invoices Approved February 2018 to April 2019



FY18	Dec 2017 - Feb 2018	$	55,669.36
FY19	Mar-18	$	13,430.25
	Apr-18	$	41,606.36
	May-18	$	105,275.18
	Jun-18	$	79,153.87
	Jul-18	$	79,688.39
	Aug-18	$	88,265.80
	Sep-18	$	74,614.84
	Oct-18	$	72,797.56
	Nov-18	$	89,225.74
	Dec-18	$	79,013.63
	Jan-19	$	79,496.83
	Feb-19	$	79,496.83
FY20	Mar-19	$	66,827.00
	Apr-19	$	60,383.00
FY20 Contract Budget		$	278,944.00
FY20 Contract Budget Balance		$	151,734.00
Total SLDMWA Expenses to Date		$	105,283.45
FY20 Budget		$	705,481.00
FY20 Budget Remaining		$	321,253.55

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY

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MEMO

TO: North-Central Committee
FROM: San Luis & Delta-Mendota Water Authority
PRESENTED BY: Andrew Garcia, SLDMWA
SUBJECT: Overall N/C Budget to Actual
DATE: June 27, 2019 Committee Meeting

Budget:
Overall budgeted SLDMWA expenditures for the North Central Committee is $1,151,157.
Budget for Woodard & Curran contract expenses is $1,157,564.
Budgeted portion of Coordinated expenses for N/C Committee is $43,366
Proposed Budget Additions total is $266,522.

Expenses (Including Budget Additions):
SLDMWA expenses through May 2019 are $456,072 or 17.4% of expenses.
Woodard & Curran invoices through April total $1,065,182 or 40.7% of expenses.
N/C portion of Coordinated expenses are $44,404 or 1.7%.

Bottom Line (Including Budget Additions):
Budget remaining for FY 2020 is $1,052,951 or 40.2%.

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2017 - FEBRUARY 28, 2020
NORTHERN SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT (FUND 64)

Report Period 3/1/17 - 5/31/19
North Central Meeting 06.27.19

EXPENDITURES	Annual Budget	Proposed Budget Addition	Proposed Budget Total	Previous Expenses	Current Expenses	Total Expenses to Date	Amount Remaining	% of Budget Spent	% of Amt Complete	Expenses Through
Legal	$ 46,497		$ 46,497	$ 25,032	$ 2,007	$ 27,039	$ 19,458	58%		5/31/2019
Authority Salaries & Administration	$ 496,161	$ 39,433	$ 535,594	$ 138,282	$ 24,481	$ 211,591	$ 324,003	40%		5/31/2019
Additional Admin Services $ 24,495										
Other										
Other Services and Expenses	$ 23,183		$ 23,183	$ 6,584	$ 1,436	$ 8,020	$ 15,163	35%		5/31/2019
License & Continuing Education	$ 382		$ 382	$ 50		$ 50	$ 332	13%		5/31/2019
Conferences & Training	$ 24,258		$ 24,258	$ 1,068	$ 290	$ 1,358	$ 22,901	6%		5/31/2019
Travel/Mileage	$ 6,287		$ 6,287	$ 2,122	$ 261	$ 2,383	$ 3,904	38%		5/31/2019
Group Meeting	$ 758		$ 758	$ 331	$ 175	$ 506	$ 252	67%		5/31/2019
Telephone	$ 1,132		$ 1,132	$ 1,666	$ 427	$ 2,093	$ (961)	185%		5/31/2019
Contracts										
North Portion of Coordination Expenses	$ 21,683	$ 9,952	$ 31,635	$ 22,202		$ 22,202	$ 9,432	70%	10%	4/30/2019
Funding Administration	$ 9,006		$ 9,006	$ -	$ -	$ -	$ 9,006	0%	10%	4/30/2019
Data Management	$ 43,239		$ 43,239	$ 44,968	$ -	$ 44,968	$ (1,729)	104%	95%	4/30/2019
Flow Modeling	$ 188,066	$ 30,090	$ 218,156	$ 204,970	$ 4,510	$ 209,480	$ 8,676	96%	95%	4/30/2019
Monitoring	$ 20,218		$ 20,218	$ 18,768	$ 6,547	$ 25,314	$ (5,097)	125%	75%	4/30/2019
Intrabasin Coordination	$ 76,094	$ 65,719	$ 141,813	$ 101,972	$ 12,337	$ 114,309	$ 27,505	81%	65%	4/30/2019
GSP Preparation	$ 154,722		$ 154,722	$ 120,198	$ 5,966	$ 126,164	$ 28,558	82%	65%	4/30/2019
Financing	$ 44,044		$ 44,044	$ 3,463	$ 515	$ 3,977	$ 40,067	9%	10%	4/30/2019
Outreach and Education	$ 43,395		$ 43,395	$ 8,062	$ 318	$ 8,380	$ 35,015	19%	29%	4/30/2019
subtotal	*$ 578,782*	*$ 95,809*	*$ 674,591*	*$ 502,399*	*$ 30,192*	*$ 532,591*	*$ 142,001*	79%		
	$ 1,157,564		$ 1,349,182							
PROPOSED BUDGET ADDITIONS		$ 145,194								

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY

MARCH 1, 2017 - FEBRUARY 28, 2020

CENTRAL SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT (FUND 65)

Report Period 3/1/17 - 5/31/19
North Central Meeting 06.27.19

EXPENDITURES	Annual Budget	Proposed Budget Addition	Proposed Budget Total	Previous Expenses	Current Expenses	Total Expenses to Date	Amount Remaining	% of Budget Spent	% of Amt Complete	Expenses Through
Legal										
	$ 32,400		$ 32,400	$ 31,238	$ 4,951	$ 36,189	$ (3,789)	112%		5/31/2019
Authority Salaries	$ 485,199	$ 27,500	$ 512,699	$ 129,115	$ 24,416	$ 153,530	$ 359,169	30%		5/31/2019
Additional Admin Services	$ 15,723									
Other										
Other Services and Expenses	$ 23,150		$ 23,150	6421.56	$ 1,443	$ 7,865	$ 15,285	34%		5/31/2019
License & Continuing Education	$ 250		$ 250	402.5		$ 403	$ (153)	161%		5/31/2019
Conferences & Training	$ 5,000		$ 5,000	715	$ 290	$ 1,005	$ 3,995	20%		5/31/2019
Travel/Mileage	$ 5,000		$ 5,000	1911.12	$ 219	$ 2,130	$ 2,870	43%		5/31/2019
Group Meeting	$ 500		$ 500	330.91	$ 175	$ 506	$ (6)	101%		5/31/2019
Telephone	$ 1,000		$ 1,000	$ 1,096	$ 308	$ 1,404	$ (404)	140%		5/31/2019
Contracts										
North Portion of Coordination Expenses	$ 21,683	$ 9,952	$ 31,635	$ 22,202		$ 22,202	$ 9,432	70%	10%	4/30/2019
Funding Administration	$ 9,006		$ 9,006	$ -	$ -	$ -	$ 9,006	0%	20%	4/30/2019
Data Management	$ 43,239		$ 43,239	$ 44,968	$ -	$ 44,968	$ (1,729)	104%	15%	4/30/2019
Flow Modeling	$ 188,066	$ 30,090	$ 218,156	$ 204,970	$ 4,510	$ 209,480	$ 8,676	96%		4/30/2019
Monitoring	$ 20,218		$ 20,218	$ 18,768	$ 6,547	$ 25,314	$ (5,097)	125%	10%	4/30/2019
Intrabasin Coordination	$ 76,094	$ 65,719	$ 141,813	$ 101,972	$ 12,337	$ 114,309	$ 27,505	81%	0%	4/30/2019
GSP Preparation	$ 154,722		$ 154,722	$ 120,198	$ 5,966	$ 126,164	$ 28,558	82%		4/30/2019
Financing	$ 44,044		$ 44,044	$ 3,463	$ 515	$ 3,977	$ 40,067	9%		4/30/2019
Outreach and Education	$ 43,395		$ 43,395	$ 8,062	$ 318	$ 8,380	$ 35,015	19%	10%	4/30/2019
subtotal	*$ 578,782*	*$ 95,809*	*$ 674,591*	*$ 502,399*	*$ 30,192*	*$ 532,591*	*$ 142,001*	79%		
OVERALL TOTAL	$ 1,152,964	$ 133,261	$ 1,286,225	$ 695,831	$ 61,993	$ 757,824	$ 528,400	54%	10%	

PROPOSED BUDGET ADDITIONS	$ 133,261

San Luis & Delta-Mendota Water Authority
GSP Development Amendment for SGWP Projects

Tasks	Leslie Dumas	Reza Namvar	Ian Jaffe	Technical Lead	Natalie Cochrane	Zachary Roy	Staff Support	Graphics	Admin.	Total Hours	Total Labor Costs (1)	Outside Services: Stantec	Outside Services: Subtotal	Outside Services: Sub Consultant Total Cost (2)	ODCs	Total ODCs (3)	Total New Fee	Existing Fee	Total Fee (with reallocation)	Proposed Category 1 Funded	Notes
	Project Manager	Modeling Lead	Project Controls / Technical Lead	Data Collection and Analysis	Technical Lead	Modeling Support	Misc.	Graphics and Support				Outreach									
	$282	$282	$212	$266	$187	$162	$162	$110	$110												
Phase 1: Northern and Central GSP																					
1.3 Flow Modeling										300	$60,180		$0	$0		$0	$60,180	$376,131	$436,311		
Finalize Historical and Current Water Budgets	4	8			12	24				48	$9,516		$0	$0		$0	$9,516				
Develop Future Baseline Water Budgets	2	8			2	16				28	$5,786		$0	$0		$0	$5,786				*This estimate was prepared based on current budget status and the additional scope covered in January and February 2019. The amendment should carry us to task completion.*
Develop Future Baseline Water Budgets with Climate Change	2	8			2	20				32	$6,434		$0	$0		$0	$6,434				
Develop Scenarios using Future with CC Water Budgets	4	12			12	32				60	$11,940		$0	$0		$0	$11,940				
Prepare Water Budgets TM	4	12			16	16				48	$10,096		$0	$0		$0	$10,096				
Attend meetings and Conference Calls	8	8			8	8				32	$7,304		$0	$0		$0	$7,304				
Additional Documentation		4			8	40				52	$9,104		$0	$0		$0	$9,104				
1.5 Intrabasin Coordination	320		120		80					520	$130,640		$0	$0	$725	$798	$131,438	$152,188	$283,626	$283,626	*Covers additional meetings/coordination*
~~2.9 (Optional Task) Annual Reporting~~																	~~$134,796~~		~~$134,796~~		
Data collection and analysis	32		72	80	68		80			332	$71,244		$0	$0		$0	$71,244		$71,244		*This new task covers the Annual Reporting requirements for the N&C group (the 2020 report and template development).*
Annual Report Documentation	48		80	16	80		80	4	4	312	$63,552		$0	$0		$0	$63,552		$63,552		
Subtotal Phase 1:	424	60	272	96	288	156	160	4	4	1464	$325,616	0	0	0	$725	$798	$326,414		$854,733	$283,626	
Phase 2: Coordinated Activites																					
2.1 Finding Coordination and Administration *(Category 1 Project)*			24				16			40	$7,680		$0	$0		$0	$7,680	$39,980	$47,660	$47,660	*Covers additional amendment request and administration*
2.2 Coordinated DMS *(Category 1 Project)*			10		32		32			74	$13,288		$0	$0		$0	$13,288	$28,614	$41,902	$41,902	
2.5 Intrabasin Coordination	280		90		192					562	$133,944		$0	$0	$396	$436	$134,380	$139,564	$273,944	$273,944	*Covers additional meetings/coordination*
2.6 (New Task) Coordinated Flow Modeling																					
2.6.1 D-M Water Budgets & Scenarios *(work already completed)*	4	8			88	32				0	$25,024						$25,024	$0	$25,024	$25,024	
Compile Historical and Current Water Budgets and Compare Total Storage										0	$0		$0	$0		$0	$0				***This work has already been completed.*** *The new task covers the model effort to roll up and coordinate the individual GSP water budgets and underflows that was needed.*
Compile Future Baseline Water Budgets										0	$0		$0	$0		$0	$0				
Compile Future Baseline Water Budgets with Climate Change										0	$0		$0	$0		$0	$0				
Compile Scenarios using Future with CC Water Budgets										0	$0		$0	$0		$0	$0				
Prepare Water Budgets Sections of GSP Common Chapter										0	$0		$0	$0		$0	$0				
Attend meetings and Conference Calls										0	$0		$0	$0		$0	$0				
Subtotal Phase 2:	284	8	124	0	312	32	48	0	0	808	$179,936	$0	$0	$0	$396	$436	$180,372		$388,530	$388,530	
Phase 3: Facilitation and Outreach Support																					
SDAC Engagement and Education Program *(Category 1 Project)*										44	$12,128	$35,568	$35,568	$39,125		$0	$51,253	$48,442	$99,695	$51,253	
Public Meeting Support	40		4							44	$12,128		$0	$0		$0	$12,128				
SDAC Representation *(Category 1 Project)*										8	$1,596	-$8,078	-$8,078	-$8,886		$0	-$7,290	$44,984	$37,694	-$7,290	
Technical Assisstance Request			4		4					8	$1,596		$0	$0		$0	$1,596				*Stantec has requested shifting some of their existing budget off of the SDAC Representation task.*
Vulnerability Assessment and Project Development *(Category 1 Project)*										182	$36,164	$41,216	$41,216	$45,338		$0	$81,502	$25,370	$106,872	$81,502	*Subtasks listed here represent expanded W&C scope.*
Component Administration	8		32							40	$9,040		$0	$0		$0	$9,040				
Rapid Appraisal Form	4		8		12					24	$5,068		$0	$0		$0	$5,068				
Vulnerability Assessment Report of SDAC	4		8		12		28			52	$9,604		$0	$0		$0	$9,604				
Conceptual Project Development Memos	8		16				42			66	$12,452		$0	$0		$0	$12,452				
Subtotal Phase 3:	64	0	72	0	28	0	70	0	0	234	$49,888	68,706	$68,706	$75,577	$0	$0	$125,465		$244,261	$125,465	
TOTAL without Optional Tasks	692	68	316	0	480	188	118	0	0	1862	$395,620	$68,706	$68,706	$75,577	$1,121	$1,234	$497,455		$1,352,728	$797,621	
Optional Tasks TOTAL	80	0	152	96	148	0	160	4	4	644	$134,796	$0	$0	$0	$0	$0	$134,796		$134,796	$0	
TOTAL	772	68	468	96	628	188	278	4	4	3040	$665,508	$68,706	$68,706	$75,577	$1,121	$1,234	**$632,251**	<--Amendment Request		**$797,621**	

1. The individual hourly rates include salary, overhead and profit.
2. Subconsultants will be billed at actual cost plus 10%.
3. Other direct costs (ODCs) such as reproduction, delivery, mileage (rates will be those allowed by current IRS guidelines), and travel expenses, will be billed at actual cost plus 10%.
4. The RMC/W&C Team reserves the right to adjust its hourly rate structure and ODC markup at the beginning of the calendar year for all ongoing contracts.

Discussion of Delta-Mendota Subbasin Sustainability Goal

Proposed language for review during the June 10, 2019 Coordination Committee meeting:

"The Delta-Mendota Subbasin will manage groundwater resources for the benefit of all users of groundwater in a manner that allows for operational flexibility, ensures resource availability under drought conditions, does not negatively impact surface water diversion and/ conveyance and delivery capabilities. This goal will be achieved through the implementation of projects and management actions, and continued coordination with neighboring subbasins to ensure the absence of undesirable results by 2040."

MONITORING REQUIREMENTS

Item	Frequency	Section
Water Level	2/Year	7.2.5.1.3
Water Quality	1/Year	7.2.5.4.3
interconnected Surface Water	2/Year	7.2.5.6.3
Land Subsidence	Continous monitoring site or by Management Area	7.2.5.5.4

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MEMORANDUM

TO: Northern and Central Delta-Mendota Activity Agreement Management Committee

CC: Andrew Garcia (San Luis & Delta-Mendota Water Authority)

FROM: Natalie Cochran and Leslie Dumas (Woodard & Curran)

DATE: June 26, 2019

RE: Northern & Central Delta-Mendota GSP – Comments Received from Northern and Central Regions

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This memorandum summarizes the broader comments received by members of the Northern and Central Delta-Mendota Activity Agreement Management Committee and Technical Advisory Committee that require additional input for Woodard & Curran to address in the Northern & Central Delta-Mendota GSP.

Chapter 1 - Introduction

No substantial comments were received on **Chapter 1** *Introduction*. Woodard & Curran will incorporate the comments received on this section.

Chapter 2 – Plan Area

This chapter has been completed.

Chapter 3 – Governance

This chapter has been completed.

Chapter 4 - Outreach and Communication

The following comment was received on **Chapter 4** *Outreach and Communication*:

- **Section 4.3.4.1** *Informational Documents*
    - **Comment from Bobby Pierce:** "These were also emailed out to all our constituents and I believe PID's as well. We also mailed (USPS) out notices of Public Workshops to addresses we have on file for our landowners and water users. I also provided Public Workshop notices to GCSD, WCSD and Stanislaus County Housing Authority for distribution within their service area."
        - **Response from Woodard & Curran:** Please provide additional information/details regarding individual outreach efforts. If you prepared and distributed any materials other than those produced at the Subbasin level, please provide copies of those documents.
            - Bobby, can you please provide copies of any documentation supplemental to what was made available at public meetings or on the website for an appendix (if you have not yet sent these to Ian)?

- Vince, can you please confirm that you conducted similar efforts, as Bobby describes?
- Others, can you please describe/provide more details and documentation regarding such public outreach conducted specifically within your GSA/agency?

Chapter 5 – Basin Setting

Introduction to this section to be written but is very general.

Section 5.2 – Hydrogeologic Conceptual Model

This section has been completed.

Section 5.3 - Groundwater Conditions

The following comments were received on **Chapter 5** *Basin Setting*, **Section 5.3** *Groundwater Conditions*:

- **Section 5.3.2.1** *Available Data*
    - **Comments from Ben Fenters** regarding groundwater levels data sources listed
        - **Response from Woodard & Curran:** The data sources listed for all sustainability indicators only include the data presented and analyzed for the Groundwater Conditions section, such as for making contour maps and hydrographs. It is not intended to be comprehensive of all potential data sources available.
- **Section 5.3.2.2** *Historic Conditions*
    - **Comment by Bobby Pierce:** "There is no discussion on San Joaquin River diversions. These have had a significant impact on imported water supplies to the subbasin prior to the DMC and Aqueduct being in service. Besides WSID, PID, El Soyo Water District, Whitelake Mutual Water Company, there are many other private SJR diverters who have imported water to the subbasin. There is no mention of these diversions in this section. I think the subbasin would be better characterized with some discussion of these water importers."
        - **Response by Woodard & Curran:** We can certainly describe San Joaquin River diversions and the significance of the river as a water supply source to these agencies. However, as written, we are not considering SJR diversions as imported water (rather as a local source of surface water). As written, imported water supplies are those that come from outside the Delta-Mendota Subbasin (such as CVP and SWP water).

          If you'd like us to address SJR diversions as imported water, we will require magnitude and more background/detail as to the significance of San Joaquin River diversions, such as conditions before these diversions began?

- **Comment by Bobby Pierce:** Under *Post-Imported Water Deliveries (1950s-2012)*, "I don't believe this is an accurate statement. I believe, at least for the Northern Region, SJR diverters are the primary importers of water to the Region."
    - **Response from Woodard & Curran:** Bobby, you are correct in that San Joaquin River diverters are the largest by volume surface water users in the Northern region. But for example, in 2018, in the Northern and Central Regions combined, San Joaquin River water accounted for about 1/3 of the total surface water deliveries where CVP + SWP accounted for 2/3. We can modify this sentence to discuss the Northern vs Central Regions separately.
- **Comment by Vince Lucchesi:** Under *Post-Imported Water Deliveries (1950s-2012)*, "Of the northern region, only DPWD (or its original collection of agencies) came into existence to participate with the CVP. Other than DPWD, the whole area was on surface water off of the SJR. I could be corrected, but prior to the CVP, most of the westside farms were sheep grazing land."
    - **Response from Woodard & Curran:** We can certainly separate out discussion of the Northern vs Central Regions here, though by volume, CVP deliveries are the largest source of imported water when discussing the Northern and Central Regions collectively.

- **Section 5.3.2.4** *Groundwater Trends*
    - **Comments from Vince Lucchesi and Ben Fenters** regarding hydrographs and contour maps pulled from the Western San Joaquin GAR and Grassland Drainage Area GAR
        - **Response from Woodard & Curran regarding hydrographs:** These hydrographs came from the respective GARs and with the well IDs used and the timeseries data LSCE provided us, we were not able to match the timeseries data with the wells shown in the hydrographs. So, we were not able to recreate these maps to describe where the wells are located or make the hydrographs easier to read. The goal of using these figures/maps were (1) to save time and money by not recreating these figures and (2) using the hydrographs to show/demonstrate groundwater trends generally across the Subbasin.
        - **Response from Woodard & Curran regarding contour maps:** The contour maps pulled from the respective GARs did not provide a vertical datum. It appears that "recent" is defined as the average groundwater levels for each season at each well since 2000, where I believe GAR data extends to 2014-2015.
    - **Comment from Vince Lucchesi:** Under *Groundwater Contours*, "Can you provide which Datum you are referring to?"
        - **Response from Woodard & Curran:** Yes, can either P&P or SLDMWA provide the datum for the groundwater elevation measurements used to create the seasonal high and low contour maps?

- **Comment from Ben Fenters: "**Is this the approach we agreed to as a basin? It doesn't seem right. If the vast majority of the basin is peaked in say March, why would we dilute that with data from other months? Shouldn't it be whatever data set taken within this period is reflective of the peak?"
    - **Response from Woodard & Curran:** The text has been clarified to state that the highest groundwater elevation measurements for each season were used for contouring.

- **Section 5.3.3** *Groundwater Storage*
    - **Comment from Ben Fenters:** "This statement has been bugging me, not as a statement itself but conceptually. In Section 5.3.2.3 we state, "groundwater levels began to recover and reach near historic highs by 2017" and yet we also say and indicate graphically that our cumulative change in storage is far less than it should be if water levels were near historic highs. So, in my mind, these two statements are incompatible, and I think it is also an indication that our change in storage calculation is significantly flawed. I recommend that we include a section stating that there is disagreement between our calculated change in storage and observations."
        - **Response from Woodard & Curran:** The cumulative change in storage calculation is relative to the change in storage beginning in 2003 (the start of the historical water budget period) and encompasses the storage loss during the recent drought (which was significant). So, it encompasses conditions and groundwater use further back than 2017 (which is what we are describing in current conditions). We can add disclaimer language here like you described above to emphasize the change in conditions between the height of the drought and 2017.

- **Section 5.3.5** *Groundwater Quality*
    - **Comment from Vince Lucchesi:** "Seriously? I have trouble believing this. Isn't there a database that the state maintains for hazardous waste cleanup sites?"
        - **Response from Woodard & Curran:** Yes, the State maintains GAMA-GeoTracker which shows a list of active contamination sites in the State. Based on a survey of GeoTracker for the N-C DM, there are 17 active sites in the N-C DM regions. Most are petroleum contamination (from tank or piping leaks) in soil and shallow groundwater and most are old sites (from 1990s and early 2000s) and do not have remedial actions going (indicating that they are not priority cleanup sites so no significant contamination). The only site of 'potential concern' is the former Crows Landing Naval Landing facility. These lands are being transferred to Stanislaus County who are looking at redeveloping them (Crows Landing Business Park) which will include any remedial efforts.

- **Section 5.3.5.2** *Historic and Current Conditions and Trends*
    - **Comment from Ben Fenters:** "Rick Iger (P&P) knows of a study where they discovered that Nitrate was naturally occurring in the Origalita Creek alluvium (just south of LB) probably worth including/noting."

- **Response from Woodard & Curran:** Noted, we have reached out to Rick to get a copy of this study and will include mention of it as a reference as applicable.

- **Comment from Ben Fenters:** Under *Total Dissolved Solids*, comment regarding TDS and Boron in the Little Panoche Creek Reservoir.

  - **Response from Woodard & Curran:** We can write some language around the information you provided in your comment. We will reach out to you if we need additional information.

- **Section 5.3.6** *Land Subsidence*

  - **Comment from Ben Fenters: "**Should include long pipelines as being potentially impacted by subsidence. There are a bunch of oil and natural gas lines running through our area and also from time to time we will get an irrigation pipe that ruptures, no real evidence to say it is from subsidence but certainly seems plausible, particularly for our long east west running concrete pipes."

    - **Response from Woodard & Curran:** I think the idea in developing this section was to address the primary documented impacts of subsidence. We can mention irrigation pipe ruptures potentially caused by subsidence.

- **Section 5.3.6.1** *Available Data*

  - **Comment from Ben Fenters: "**Is the DWR aqueduct subsidence data available? Should be included, we intend on dovetailing off of their data for our proposed monitoring points along the SLC."

    - **Response from Woodard & Curran:** As of the end of February, the data/report from DWR was not available. The supplemental subsidence study is not on the DWR website and I have reached out to them to find the status of that report. That given, this information has not been received by us nor included in our data set/monitoring program.

- **Section 5.3.6.3** *Current Conditions*

  - **Comment from Ben Fenters:** Table 5-8 **"**Include SLC data at our proposed points: PP17, PP3?"

    - **Response from Woodard & Curran:** Ben, do you have elevation change data for these points that coincide with the 2014, 2016, and 2018 surveys performed by SLDMWA on the DMC?

- **Section 5.3.6.4** *Groundwater Trends*

  - **Comment from Ben Fenters:** Figure 5-106 **"**Add SLC Monitored points in Fresno CO"

    - **Response from Woodard & Curran:** Ben, can you please provide the coordinates for these points if you'd like them included on this map? We only have the coordinates for S104.20R.

- **Section 5.3.7 Interconnected Surface Water Systems**
    - **Comment from Ben Fenters: "**I think the TNC language suggests that groundwater extraction as a potential singular cause and effect of stream depletion, though in reality there are likely a host of causes that lead to stream depletion among those causes that lead to the need for increased groundwater pumping e.g. reduced allocations. I don't want to include language that singles out groundwater extraction."
        - **Response from Woodard & Curran:** We can modify the text so as to not single out groundwater extractions as the cause. Please look at the text in the Common Chapter (groundwater conditions section) re: GDEs and let us know if this works for you.
- **Section 5.3.7.1** *Available Data*
    - **Comment from Bobby Pierce: "**WSID is not a pre-1914 water right holder. WSID has a post 1914 appropriative right. There are many other water right holders within the basin including Blewett Mutual Water Company, El Soyo Water District, Whitelake Mutual Water Company, and many other private water right holders. If you would like an exhaustive, but not necessarily complete, list, let me know."
        - **Response from Woodard & Curran:** Noted, the referenced sentence will be modified stating WSID is a post-1914 appropriative water rights holder. We can revise this statement to include "in addition to smaller agencies and private diverters." Bobby, if you have a more comprehensive list, that would be great.
- **5.3.7.4** *Current Conditions*
    - **Comment from Ben Fenters: "**I didn't read anything that relates to timing?"
        - **Response from Woodard & Curran:** Correct, that's because these values are from the literature as opposed to a numerical model. Information on timing was not found. We can include disclaimer language that this information will be gathered through future monitoring efforts.
- **Section 5.3.7.6** *Groundwater Dependent Ecosystems*
    - **Comment from Bobby Pierce:** "Are these GDE's or are they surface water dependent ecosystems??"
        - **Response from Woodard & Curran:** Bobby, P&P might need to respond to your question here. My understanding is that efforts were made to ensure only groundwater dependent ecosystems were included in the mapping.
    - **Comment from Vince Lucchesi** regarding GDE methodology
        - **Response from Woodard & Curran:** The GDE mapping was done at the subbasin level and used a consistent methodology. Please see what was included in the Common Chapter re: this and let us know if that works for you.

- **5.3.8** *Data Gaps*
    - **Comment from Ben Fenters:** "?? There are hundreds shallow groundwater wells lining the SJR in reach 3,4a and 4b for the Restoration project alone."
        - **Response from Woodard & Curran:** Ben, you are correct but none of these Restoration project wells are within the NCDM GSP area.

Section 5.4 - Water Budget

The following comments were received on **Chapter 5** *Basin Setting*, **Section 5.4** *Water Budget*:

- **Section 5.4.3** *Key Coordinated Water Budget Decisions*
    - **Comment from Bobby Pierce:** Table 5-1 "This table is confusing. What is the difference between the Representative Water Year column and the Selected Hydrologic Water Year column."
        - **Response from Woodard & Curran:** The climate change factors provided by DWR for precipitation and evapotranspiration only extend through 2011 so the years in the "Selected Hydrologic Water Year" column are surrogate years to fill those gaps. The first column "Water Year in Projected Water Budgets" represents the simulated year in the water budget and the "Representative Water Year" is the hydrologic year. We could probably make this clearer by naming the categories "Simulated Water Budget Year," "Hydrologic Year," and "Proxy Water Year for Climate Change Factors." Thoughts?
- **Section 5.4.9** *Projected Water Budget with Climate Change*
    - **Comment from Bobby Pierce:** "I thought it said earlier in this document that DWR factors were not used."
        - **Response from Woodard & Curran:** DWR's climate change factors were used for precipitation and evapotranspiration but not for surface water deliveries. We can provide more clarity here and state where DWR's factors and where local projections were used.
- **Section 5.4.11** *Sustainable Yield Estimates*
    - **Comment from Vince Lucchesi:** Under *Lower Aquifer Sustainable Yield Estimate*, "Should we make sure we use the same caveats we provided for the TM's regarding this draft document."
        - **Response from Woodard & Curran:** We incorporated a shortened, more generic version of this caveat, but can expand it if you'd like us to.
- **Overall comment from Vince Lucchesi:** "Throughout the document, I would like all dates of things that were agreed to, to be removed."

- **Response from Woodard & Curran:** The dates have been removed from some, but not all, of the Common TMs. Is that sufficient? We have no issues removing the dates.

Section 5.5 - Management Areas

The following comments were received on **Chapter 5** *Basin Setting*, **Section 5.5** *Management Areas*:

- **Section 5.5.5.2** *Minimum Thresholds and Measurable Objectives*
  - **Edit from Bobby Pierce:** WSID 1 and WSID 21 were added as subsidence monitoring points to Table 5-1.
    - **Response from Woodard & Curran:** Bobby, are WSID 1 and WSID 21 to be added to the representative monitoring network for subsidence? If so, can you please provide the coordinates for these benchmarks? Subsequent edits would also need to be made to the Monitoring section and associated maps.
- **Section 5.5.5.3** *Monitoring Analysis*
  - **Comment from Leslie Dumas:** "Bobby/Vince, I know you wanted to do your land surveys every 3 years, but given the lack of data and the fact that everyone else is going to be doing annual land surveys, I feel strongly that this is going to look odd to DWR and that they will question this. I recommend reconsidering this and doing annual surveys for at least the first 5 years. Once you establish numeric MT and MO, you can then increase the frequency of your land surveys in subsequent GSP updates."
    - **Response from Bobby Pierce:** "Maybe you can modify this area to reflect that since subsidence related impacts to water conveyance infrastructure within WSID-PID MA, benchmarks surveys will only be performed on a 3-year interval with two measurements taken within the first 5 years of implementation of the GSP."
    - **Response from Vince Lucchesi:** From my perspective, I have not heard of ditchtenders complain about reduced capacity due to subsidence. Usually the issues for capacity stem from sediment, vegetation and changing crop types. Since PID just set our benchmarks, you already have a data set during the first year. If we do two more, I can't see why that would be an issue.

      In addition, my $0.02 is that if we are only seeing a fraction of an inch per year, that could be attributed to the limited resolution and accuracy to the survey equipment to check. And if we monitor yearly, and the measurement device has an accuracy limitation that is greater than the subsidence observed, we may capture a rise and fall of elevations that might now be real. If you spread out the measurements, you may capture a higher differential that could be justified.

- **Follow-up response from Woodard & Curran:** Has a final decision been made on the frequency of subsidence monitoring in the WSID-PID management area? It might look odd to DWR if this management area is only monitoring every 3 years while the remainder of the Plan Area is monitoring annually.

- **Section 5.5.5.4** *Operation and Outside Impacts*
    - **Comment from Vince Lucchesi:** "Isn't this enough justification that we don't need to monitor annually? For PID, one goal of doing this was to limit my costs."
        - **Response from Woodard & Curran:** This comment is referring to the following sentence: "Therefore, based on professional judgement, it is unlikely that operation under different minimum thresholds and measurable objectives will cause undesirable results outside the MA." As the person stamping this document, I'm not sure I agree. Given that the first 5-year interim goal for this management area is "Establish Minimum Threshold and Measurable Objective for this parameter", this indicates that there is insufficient information to set a MT/MO relating to subsidence in this management area, and given only one additional data set in the 5 year period (assuming a 3-year frequency in data collection) combined with what the DMC subsidence monitoring is showing in Stanislaus County (increased subsidence) to me beckons the question as to why annual subsidence surveys are not being done in the management area annual like everywhere else.

Chapter 7 – Sustainability Implementation

Section 7.1 - Projects and Management Actions

The following comments were received on **Chapter 7** *Sustainability Implementation*, **Section 7.1** *Projects & Management Actions*:

- **Section 7.1** *Projects and Management Actions*
    - **Comments from Bobby Pierce:** Table 7-1
        - This should be Tier 2 - "West Stanislaus Irrigation District Lateral 4-North Recapture and Recirculation Reservoir"
            - **Response from Woodard & Curran:** This has already been modeled as a Tier 1 project. It would be a substantial effort to change this now and would require redoing not just the N-C DM projected water budget but also the subbasin level ones (including, we'd have to identify a replacement project).
        - This will not happen within WSID GSA – Rotational Fallowing of Crop Lands Management Action (Tier 1)
            - **Response from Woodard & Curran:** Not all management actions are applicable to all areas. Please note that the text in this section

says 'as needed", and if it's not needed in WSID, then it doesn't need to be implemented. We can also move this to a Tier 2 management action if that is preferred.

- Groundwater Extraction Fee with Land Use Modifications (Tier 3 management action) – "Was this ever agreed to? If not, suggest removing."
    - **Response from Woodard & Curran:** Yes, that is why it is a Tier 3 management action and would be implemented as a last resort if the Regions were not meeting their sustainability goals. Quite honestly, if you don't meet your sustainability goals, then the SWRCB is going to step in and do this anyway.

- **Section 7.1.1.1.5** *Kaljian Drainwater Reuse Project*
    - **Comment from Ben Fenters:** "As a District, we don't want to offer any commitments to recharge water if we are not in a position where we would need to do so."
        - **Response from Woodard & Curran:** This comment was made in regards to the following sentence: "Of the 2,700 AFY annual average yield, it is estimated that this project would offset approximately 500 AFY of groundwater extraction; and a portion of this water may be directly recharged in the Los Banos Creek Recharge Project." These are the conditions that were modeled for the water budget. Maybe we can provide a disclaimer regarding as actual water for recharge is available.

- **Section 7.1.1.2.4** *GSAs Having Access and Input to Well Permits*
    - **Comment from Ben Fenters:** "This seems like the easiest way to go about this, but couldn't a GSA simply require that all new wells be approved by the GSA irrespective of the county's cooperation?"
        - **Response from Woodard & Curran:** I think that this is a legal question. My understanding is that SGMA does not affect existing authorities, and presently, it's up to the County to issue well construction permits. Additionally, County groundwater ordinances affect how groundwater is used and moved (in various forms and fashions). Finally, SGMA specifically says that it does not impact water rights, so I'm not sure (again, I'm not a lawyer) if the GSAs have that legal authority. The goal here is make this a more 'cooperative' management effort.

- **Overall Comments**
    - **Moving projects & management actions to different tiers**
        - The projects have already been placed into tiers according to the year when project benefits will be observed with input from each project proponent. These projects and management actions have already been modeled and included in the water budget according to the information provided by the project proponents, which are written up in this chapter.
    - **Project feasibility**

- Input regarding project feasibility and the ability to acquire the necessary permits and funding have already been discussed with each project proponent and included in this section and the model according to these criteria.

- **Comment from Bobby Pierce:** "Are we sure all projects listed are committed to by representing agency including funding commitment?"

  - **Response from Woodard & Curran:** The list of projects and management actions were circulated for comment and review prior to modeling/incorporation into the water budgets. Tier 1 projects were pulled predominantly from IRWM Plans.

- **Comments from Vince Lucchesi**

  - "One big thing that I noticed was a lot of stormwater capture projects, which are great and awesome and good ideas. But there's like a whole process in getting allowed to capture the water. And to top it all off, some of the agencies that want to claim the projects don't have land that borders these streams, so how do they get this water? And you have a couple of projects claiming the same water."

    - **Response from Woodard & Curran:** Further discussion and input is required details required.

  - "These management actions need to be beefed up in their descriptions as to what exactly we are doing and what resources we have to enforce them. Like buying surplus water, who is going to buy surplus water if they can't get their growers to take it if groundwater pumping is cheaper? You need to have the mechanics worked out in these descriptions and let us work through them in the review and prior to adoption have a good conversation."

    - **Response from Woodard & Curran:** Further discussion and input is required.

  - "Furthermore, regarding the management actions, no language was added in this section describing the huge lack of data and how we can't enforce some of the major management actions until we are confident in the data backing up their recommended action."

    - **Response from Woodard & Curran:** Further discussion and input is required.

  - "Regarding data gaps, well permits etc. Are these really management actions or something that the GSA should already be doing? I've already requested well permits and I'm going to see how I can get approval authority on these wells in the future."

    - **Response from Woodard & Curran:** Further discussion and input is required.

Section 7.2 - Monitoring

The following comments were received on **Chapter 7** *Sustainability Implementation*, **Section 7.2** *Monitoring*:

- **Section 7.2.5.1.2** *Monitoring Protocols and Data Reporting Requirements*
    - **Comment from Bobby Pierce:** Under Data Reduction, Validation, and Reporting, "Is this really needed. Seems like any bogus numbers will jump out at us when reviewing reports. This additional step is labor intensive and adds $$'s."
        - **Response from Woodard & Curran:** This is standard protocol for data entry and fits within the larger piece of data management where data collected by the individual GSAs are going to have to be compiled and checked by the GSA Lead for submittal to the GSP representative, who then also complies the data and does a QC check. So, along the way, this will be happening.
- **Section 7.2.5.4.2** *Monitoring Protocols and Data Reporting Requirements*
    - **Comment from Vince Lucchesi:** "Can we leave this a bit more vague? I think deferring to the requirements of the lab for water quality and deferring to any standards that are established for monitoring. I'd hate to be stuck for the next 5 years on something that may change due to more advance technology."
        - **Response from Woodard & Curran:** Most of the language regarding water quality sampling protocol and data reporting are consistent with DWR's SGMA BMPs and standard industry protocols. Are there specific areas/sections you would like to see consolidated or removed?
- **Section 7.2.5.5.3** *Monitoring Protocols and Data Reporting Requirements*
    - **Comment from Bobby Pierce: "**Wow. I don't see the benefit of performing this. This adds more $$. I strongly suggest deleting."
        - **Response by Woodard & Curran:** This comment is in response to the following paragraph: "In addition to data collected directly by the Northern and Central Delta-Mendota GSAs, subsidence data will be downloaded on a monthly basis from publicly available sources such as UNAVCO and DWR's SGMA Data Viewer for assessment with local data. All data will be maintained in the Northern & Central Delta-Mendota GSP DMS."

          Has follow-up discussion taken place as to how frequently publicly available subsidence data should be downloaded?
- **Section 7.2.5.6.1** *Selected Monitoring Sites*
    - **Comment from Bobby Pierce: Table 7-8** "Aren't we using two of WSID's wells. WSID Well #1 and a monitoring well located at the river. I previously provided location information."
        - **Response from Woodard & Curran:** For the Interconnected Surface Water monitoring network, we have some depth to water data from 2009 to 2017 for WSID Well #1 but we don't have location information. As for the

monitoring well located at the river, I believe you're referring to the shallow wells for the fish screen project. Those wells were ultimately not included because timeseries information was not available, plus it was indicated that those wells would be destroyed once the fish screen project was funded. Please note that you can include these wells in your 'private' monitoring network, and they can be worked into the representative monitoring network in the future.

- **Comment from Vince Lucchesi:** "I have my doubts that the SJR's influence extends 3 miles out. Especially due to the gradient to the coast range. I could be wrong, but that's my opinion. Also, I don't know if my existing monitoring wells are actually monitoring water that is influenced by the River and I'd hate to use that as some criteria, unless you can demonstrate that the WS Elevation is closely tied to the WSL in the SJR."
    - **Response from Woodard & Curran:** Three miles was provided as guidance under DWR's SGMA BMPs. I don't think we have any information to support or a particular buffer of influence. We can try to soften the language a bit indicating that this distance was provided in the BMPs by DWR and further data collection and analysis will determine the appropriate distance from the river for monitoring surface water-groundwater interaction.
- **Section 7.2.5.6.3 Frequency and Timing of Monitoring**
    - **Comment from Bobby Pierce: "**What is the frequency of monitoring and how often will we pull data from CDEC and other sites? How do we quality control data coming out of CDEC? Constant adjustment to calibration is needed on those sites and it typically take reaching by use in order for that to happen. You can't just believe CDEC data."
        - **Response from Woodard & Curran:** The CDEC data (and data from other publicly available data sets) will likely be pulled on an annual or semi-annual basis and imported into the DMS. As these are publicly available data sets, the QC reviews are done prior to their publication by the data owner (for CDEC, DWR). Like any other data point, the CDEC data will be have used with a critical eye as to when it does and doesn't make sense in the required analyses.

- **Quality Assurance Program Plan Appendix**
    - **Section 9.2** *Water Quality Monitoring*
        - **Comment from Bobby Pierce:** "No way I'm doing lab testing two times a year. I'll do this once every 3 years and that's it. Field testing we can do. That's not as big of a financial burden as lab testing. We already have a high lab test expense every year and don't need to add to that. Lab tests once every three years seems pretty consistent with other programs. "

- **Response from Woodard & Curran:** I believe this has already been discussed but just to confirm, water quality lab testing for TDS, nitrate, and boron only will be performed two times per year.

GSP Chapter/Section	Status	N-C DM Review Due Date	Anticipated Date of Posting for Public Review	Comment Close Date
Executive Summary	To Be Written	7/26/2019	8/30/2019	9/27/2019
Chapter 1 - Introduction	Drafted	6/21/2019	8/30/2019	9/27/2019
Chapter 2 - Plan Area	**Completed**	**Completed**	**Completed**	**Completed**
Chapter 3 - Governance & Administration	**Completed**	**Completed**	**Completed**	**Completed**
Chapter 4 - Outreach & Communication	Drafted	7/8/2019	8/30/2019	9/27/2019
Chapter 5 - Basin Setting – Section 5.2: Hydrogeologic Conceptual Model	**Completed**	**Completed**	**Completed**	**Completed**
Chapter 5 - Basin Setting – Section 5.3: Groundwater Conditions	Drafted	6/14/2019	8/2/2019	5/31/2019
Chapter 5 - Basin Setting – Section 5.4: Water Budgets	Drafted	7/5/2019	8/2/2019	6/28/2019
Chapter 5 - Basin Setting – Section 5.5: Management Areas	Drafted	6/28/2019	8/2/2019	6/28/2019
Chapter 6 - Sustainable Management Criteria	Drafted	7/26/2019	8/30/2019	9/27/2019
Chapter 7 - Sustainability Implementation – Section 7.1: Projects & Management Actions	Drafted	6/21/2019	8/2/2019	7/26/2019
Chapter 7 - Sustainability Implementation – Section 7.2: Monitoring	Drafted	6/28/2019	8/2/2019	8/30/2019
Chapter 8 - Plan Implementation	In Progress	7/26/2019	8/30/2019	9/27/2019
Chapter 9 - References & Technical Studies	In Progress	7/26/2019	8/30/2019	9/27/2019
Appendices				
Coordination Agreements	Completed	Completed	Completed	Completed
Hydrographs for SMCs	To Be Compiled	7/26/2019	8/30/2019	9/27/2019
Quality Assurance Progress Plan	Drafted	6/21/2019	8/2/2019	8/30/2019
Outreach Documentation	In Progress	7/19/2019	8/30/2019	9/27/2019
Modeling Documentation	In Progress	7/26/2019	8/30/2019	9/27/2019
GSP Crosswalk	To Be Written	To be completed last	8/30/2019	9/27/2019

NORTHERN & CENTRAL DELTA-MENDOTA

TO: Northern and Central Delta-Mendota Region Management Committees, Groundwater Sustainability Agencies, and Interested Parties

FROM: Andrew Garcia, Senior Civil Engineer

DATE: June 27, 2019

RE: First Five Years of the North-Central Delta-Mendota GSP

The San Luis & Delta-Mendota Water Authority (SLDMWA) has taken the lead, by request, in supporting the development of a groundwater sustainability plan (GSP) for the North-Central Region of the Delta-Mendota Subbasin (Subbasin). SLDMWA is coordinating with eight groundwater sustainability agencies (GSAs) in this process on behalf of the North-Central GSP Group (N-C Group). The N-C Group is one of six GSP groups within the Subbasin; each GSP group is developing a stand-alone GSP to submit to the California Department of Water Resources by January 31, 2020.

The N-C Group has developed draft chapters of the GSP and has shared these documents with the public for review and comment. The N-C Group will continue to share sections of the GSP as draft versions are finalized, while aiming to complete a final GSP draft by late summer 2019 for necessary review and comment prior to adoption and submission to DWR by January 31, 2020.

In this GSP development process, the N-C Group has identified various levels of uncertainty and data gaps associated with the information and analyses used to develop the various GSP components. The GSP will describe the uncertainty and data gaps and describe steps that will be taken to obtain additional information to develop a more complete understanding of groundwater management needs in the region. Following the GSP submission in January 2020, the N-C Group will begin to fill the identified data gaps and improve the level of detail of various plan components to firm up the N-C Group's path and improve its approach toward sustainability by 2040.

The GSP that will be submitted by the N-C Group in January 2020 is not a standalone document, but rather a guideline for the GSAs for developing a more robust understanding of their groundwater management strategies. Within the first five years following GSP submission, the N-C Group will focus on data collection and technical refinements in preparation for the first 5-Year Plan update in 2025. As such, the N-C Group is currently not planning to undergo actions to enforce implementation of management actions contained within the GSP. One exception, however, is that lower aquifer extractions and water level monitoring and control measures are being discussed, and may be implemented, in the first five years to reduce the impacts of subsidence while data are continually collected and analyzed.

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The first five years will also enable each GSA within the N-C Group to better understand its role and needs in implementing the GSP within the North-Central region. As the N-C Group expands its understanding of groundwater within the region during the first five years, the GSAs will be able to develop more or less aggressive approaches to achieve sustainability within the following 15 years.

While SLDMWA is supporting the GSP development and coordination efforts for the N-C Group, it is not a GSA and therefore is not tasked with enforcing the GSP. Any stakeholder questions regarding this approach should be addressed to their GSA.

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North/Central Delta-Mendota Region GSP - Policies and Directives

- Operating Wells in the lower aquifer to approximately 95% historic low to help monitor and reduce risk of subsidence
    - What rules should be in place for each GSA to enforce? Do the GSA reps plan on enforcing?
    - Should Composite wells be treated the same? If not, at a minimum, should they be treated the same near the DMC?
    - Associated 'Fees' need to be developed for pumpers who decide to continually pump below the historic depth at a lower aquifer extraction well?
    - Hypothetical; With a representative well in an area approaching or reaching historic low water surface elevation, how do the GSAs know who is extracting nearby and how much in order to 'enforce' or account for the extractions?
- Extraction Reporting
- Monitoring Network
    - Replacing Irrigation Wells with Monitoring Wells for most, if not all, water level network locations
- Maximize other water supplies;
    - Work with pumpers to set-aside funds for other water, recycled water, 215 water, etc. for recharge
- GSAs have access to well permits or even approval thru County ordinance
- Policies or Incentives to use surface water when available before groundwater
- Funding mechanisms – need to describe in GSP how the implementation will be funded.
- Enforcement – How are you going to monitor for enforcement? How is the GSP implementation going to be enforced? Who's going to enforce the GSP rules?

Valley Region Office
P.O. Box 15287
Sacramento, CA 95851
Phone: 916-855-4400
www.graniteconstruction.com

May 8, 2019

Delta Mendota II Groundwater Sustainability Agency
P.O. Box 1596
Patterson, CA 95363
Attention: Adam Scheuber

COMMENT LETTER ON PENDING SAN JOAQUIN VALLEY-DELTA MENDOTA MODELING AND SUSTAINABLE GROUNDWATER MANAGEMENT PLAN DEVELOPMENT

Dear Mr. Scheuber,

Granite is a full service general contractor, construction management firm, and construction materials producer. Granite has a long history of building in California and specializes in heavy civil construction of complex infrastructure projects serving the transportation, industrial, and federal markets.

Additionally, Granite has quarry operations within the San Joaquin Valley-Delta Mendota basin, which provides aggregate materials (such as road base, aggregate, and asphalt paving materials) needed to build and maintain the roads, highways, airports, water systems and other public infrastructure.

Historically most water agencies have not needed to interact directly with quarry operations (who usually operate groundwater production wells) leading to a tendency to either ignore, or treat our operations as "de minimis" users.

We strongly urge your agency to give full consideration of our operations in the development of the San Joaquin Valley-Delta Mendota groundwater basin model and future Groundwater Sustainability Plan (GSP).

We have outlined some of our concerns below.

1. **Construction aggregate mining occurs predominantly in rural areas disconnected from public water systems**

   67% of California Construction aggregate production in 2012 was produced predominantly from alluvial deposits in historic floodplains. These locations usually do not have access to public water systems and rely on groundwater wells as their only source of water.

   We urge your agency to recognize these rural wells, and their probable inability to be replaced by surface delivery systems, in basin modeling and infrastructure planning.

2. **Volumes for groundwater produced for quarry operations are not de minimis**

   Many agencies have defined "de minimis users" as users who pump less than 5 acre-feet per year (AFY). Quarry operations use hundreds of AFY (the exact amount varies based on climate, soils and nature of the mineral deposit of each facility). Lack of consideration of quarry

groundwater production will potentially result in flawed modeling, hampering long term sustainability goals.

We encourage your agency to establish a production threshold for "de minimis users" and collect all groundwater production data in excess of the defined threshold to insure the basin model is accurate.

3. **Quarries operations have basin benefits which may need to be considered**

Quarries engage in significant water recycling practices by recirculating aggregate wash water through onsite ponds, significantly reducing groundwater pumped relative to production needs. Wash ponds, and areas of impermeable surfaces, allow for groundwater recharge during operations. Further, wash water doesn't need to be potable. By using onsite wells quarries help municipal providers reduce the volumes of potable water treated and freeing system delivery capacity.

Mining activities are an interim land use which includes reclamation plans focused planning for a post mining use. Quarries may present future opportunities for water storage and/or recharge facilities, and should be considered in long term planning.

When determining undesirable impacts, sustainable practices, and future GSA projects we encourage your agency to consider efficiencies of use, and future opportunities, of quarry operations.

Granite notes that the State has recognized that the state's mineral resources are vital, finite, and important natural resources; and *encourages the responsible protection and development of these mineral resources is vital to a sustainable California*.

We have learned from experience that groundwater management plans that do not balance the needs of all natural resources produce unintended negative consequences to other protected resources (such as mineral resources); which is contrary to the State's stated sustainability goals.

Granite requests that future basin modeling and GSP development gives full consideration of the needs of aggregate facilities to insure the protection of aggregate producer's rights and furthering the State's sustainability goals relative to both water and mineral resources.

Please to contact me at 916-825-5708 or Courtney.Deporto@gcinc.com to further discuss our request and concerns.

Sincerely,
Granite Construction Company

Courtney DePorto
Valley Region Environmental Coordinator II

CC: Adam Harper, California Construction and Industrial Materials Association (CalCIMA)