

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

Wednesday September 14th, 2022, 8:00AM

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

West Stanislaus Irrigation District, 116 E Street, Westley, CA

Management Committee and Central GSA Members and Alternates Present

Northern DM Region Management Committee

Bobby Pierce, Member – West Stanislaus Irrigation District

Maria Encinas, Member – City of Patterson

Christy McKinnon, Member – Stanislaus County

Vince Lucchesi, Member – Patterson Irrigation District

Lacey McBride, Member – Merced County

Adriel Ramirez, Alternate – Merced County

Central DM Region Management Committee

Randy Miles*, Alternate – Eagle Field Water District

Danny Wade*, Member/Alternate – Fresno Slough Water District/Tranquillity Irrigation District

Aaron Barcellos*, Member – Pacheco Water District

Chase Hurley*, Alternate – Pacheco Water District

Steve Stadler*, Alternate – San Luis Water District

Amy Montgomery*, Member – Santa Nella County Water District

Augie Ramirez*, Alternate – Fresno County

Lacey McBride*, Member – Merced County

Adriel Ramirez*, Alternate – Merced County

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

San Luis & Delta-Mendota Water Authority Representatives Present

John Brodie

Ray Tarka

Others Present

Joe Hopkins – Provost & Pritchard

Others Present via Zoom

Juan Cadena* – Mercy Springs Water District

Scott Petersen – SLDMWA

Lauren Viers - SLDMWA

Leslie Dumas – Woodard & Curran

Anona Dutton – EKI Environment & Water, Inc.

Meredith Durant – EKI Environment & Water, Inc.

Lauren Layne – Baker Manock & Jensen

1. Call to Order/Roll Call

Aaron Barcellos/Pacheco WD called the meeting to order at 8:00 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 provided.

4. Committees to Review and Take Action on Consent Calendar, Barcellos

- a. Minutes for the June 20th, 2022 Joint Meeting of the Northern and Central Delta-Mendota Region Management Committees, Central Delta-Mendota GSA, and Delta-Mendota Subbasin Coordination Committee
- b. July 2022 Budget to Actual Report
- c. Grant Reimbursement Summary Report

The Committees each considered approval of the consent calendar as presented. Bobby Pierce/West Stanislaus Irrigation District provided the motion for the Northern Management Committee and Christy McKinnon/Merced County seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present. Augustine Ramirez/Fresno County provided the motion for the Central Management Committee and Amy Montgomery/Santa Nella County Water District seconded. The Central Management Committee voted by roll call; the motion was passed unanimously by those present.

5. Committees to Consider Directing Northern and Central Delta-Mendota Representatives to the Delta-Mendota Subbasin Coordination Committee to Approve the Special Projects Agreement for Grant Administration for the SGMA Round 1 Funding for the Delta-Mendota Subbasin, Brodie

The Committees each considered the recommendation for the representatives to the Subbasin Coordination Committee to approve the Special Projects Agreement for Grant Administration. Maria Encinas/City of Patterson provided the motion for the Northern Management Committee and Christy McKinnon/MC seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present. Danny Wade/Fresno Slough Water District/Tranquillity Irrigation District provided the motion for the Central Management Committee and Randy Miles/Eagle Field Water District seconded. The Central Management Committee voted by roll call; the motion was passed unanimously by those present.

6. Committees to Consider Authorization of One-Time Additional Dues Assessment for Coordinated Costs for Legal and Technical Services Associated with GSP Revision, Brodie/Tarkas/Petersen

Following discussion of the GSP revisions performed in response to the DWR comments, and recognizing that this is a matter of which budget/fund the costs were charged to, and not an overall increase in expenditures relative to budget, the Committees expressed a preference for SLDMWA to issue an invoice to the GSAs for the additional Fund 63 costs together with a check for the Funds 64 and 65 expenditures not incurred by the GSAs during revision of the NCDM

GSP. Vince Lucchesi/Patterson Irrigation District provided the motion for the Northern Management Committee and Christy McKinnon/MC seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present. Amy Montgomery/SNCWD provided the motion for the Central Management Committee and Steve Stadler/San Luis Water District seconded. The Central Management Committee voted by roll call; the motion was passed unanimously by those present.

7. Committees to Discuss Amended GSP Submitted to DWR on July 20th, 2022, Brodie/Layne

Lauren Layne/BMJ discussed submittal of the Amended NCDM GSP on July 20th, and noted that the public comment period will conclude next week. However, it is not clear when DWR will evaluate the Amended GSP and public comments and provide a response to the Delta-Mendota Subbasin. DWR is also reviewing the second batch of GSPs that were submitted in January 2022.

Anona Dutton/EKI reviewed the GSP Implementation Commitment summary tables intended to assist the GSAs in keeping on track with the commitments included in the original and Amended GSP, as well as with implementation of the individual projects and collective management actions.

8. Committees to Discuss Updated Merced County Well Ordinance and Governor's Drought Executive Order N-77-22 Regarding Role of GSAs in Well Permitting, Brodie/Ramirez

Adriel Ramirez/Merced County noted that Merced County has developed a new form for use in soliciting GSA input during the County well permitting process. He requested contact information for each GSA to include in the information that will be provided to applicants for new wells in Merced County.

9. Committees to Discuss Potential Additional Funding Opportunities, Brodie

John noted the list of grant funding opportunities included in the meeting materials. The committees discussed the schedule for the upcoming SGMA Round 2 grant application. It is currently anticipated that DWR will open the application process in October, with applications due in late 2022 or early 2023. The SGMA Round 2 process will be open to medium and high priority basins with a submitted GSP, and will have a total funding amount of \$256 million. Basins that have not yet received DWR funding for SGMA implementation may receive priority.

10. Committees to Discuss 2022 GSP Implementation

- a. **Three-Month Look-Ahead Schedule, Dutton**
- b. **GSP Implementation Tracking Tools, Dutton**
- c. **GSP Implementation Monitoring Activities and Status, Dumas**
- d. **Stakeholder Outreach and Engagement, Dumas/Dutton**

Anona Dutton referred to the three-month look-ahead schedule included in the meeting packet, and noted that it will be particularly important to evaluate the water level data this year, given the continued lack of precipitation and the revised sustainable management criteria included in the Amended GSP. Leslie Dumas/W&C noted that the water quality monitoring period has concluded and requested that the GSAs provide W&C with their data or with a status report. W&C sent an email to the GSAs on September 1st to remind them to perform the fall water level monitoring. Leslie also reported that the US Bureau of Reclamation performed subsidence monitoring along the Delta-Mendota Canal in July, although the data are not yet posted. W&C will initiate preparation of the WY2022 Annual Report in October. It will be important to include updated information on groundwater extractions.

11. Next Steps

- John Brodie will circulate a Doodle poll to schedule the November and December NCDM Management Committee meetings to avoid conflicts with major holidays.
- John Brodie will provide Adriel Ramirez with GSA contact information for inclusion in the updated Merced County well permitting process.
- John Brodie will provide the Committee members with copies of the public comments submitted to DWR on the Amended GSP, following conclusion of the public comment period.
- John Brodie will provide the Committee members with the Special Projects Agreement following approval by the SLDMWA Board, and following signature of the Grant Agreement by DWR and DPWD.
- Updates to the GSP Implementation tables will be included in future meeting packets.

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

No topics were discussed under this item.

13. Future Meetings

- a. Northern & Central Regions Management Committees
 - i. Thursday October 27th, 2022 at 10:00 AM
 - ii. November TBD, 2022
 - iii. December TBD, 2022
- b. Delta-Mendota Subbasin Coordination Committee
 - i. Monday October 10th, 2022 at 9:30 AM
 - ii. Monday December 12th, 2022 at 9:30 AM

14. Conference with Legal Counsel – Existing Litigation

The Committees met 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].

15. Report Out of Closed Session

No reportable actions were identified during the Closed Session.

16. ADJOURNMENT

Aaron Barcellos adjourned the meeting at 9:14 AM.

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

Thursday October 20th, 2022, 10:00 AM

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

Fresno County Department of Public Works and Planning, 2220 Tulare Street, Fresno, CA
8th Floor Conference Room C

Patterson Irrigation District, 948 Orange Avenue, Patterson, CA

Patterson City Hall, 2nd Floor, I Plaza, Patterson, CA

Management Committee and Central GSA Members and Alternates Present

Northern DM Region Management Committee

Bobby Pierce, Member – West Stanislaus Irrigation District

Maria Encinas, Member – City of Patterson

Vince Lucchesi, Member – Patterson Irrigation District

Lacey McBride, Member – Merced County

Central DM Region Management Committee

Randy Miles*, Alternate – Eagle Field Water District

Danny Wade*, Member/Alternate – Fresno Slough Water District/Tranquillity Irrigation District

Aaron Barcellos*, Member – Pacheco Water District

Chase Hurley*, Alternate – Pacheco Water District

Steve Stadler*, Alternate – San Luis Water District

Amy Montgomery*, Member – Santa Nella County Water District

Augustine Ramirez*, Alternate – Fresno County

Lacey McBride*, Member – Merced County

Damian Aragona*, Widren Water District

Juan Cadena*, Mercy Springs Water District

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

San Luis & Delta-Mendota Water Authority Representatives Present

John Brodie

Ray Tarka

Lauren Viers (Zoom)

Others Present via Zoom

Leslie Dumas – Woodard & Curran

Natalie Cochran – Woodard & Curran

Anona Dutton – EKI Environment & Water, Inc.

Meredith Durant – EKI Environment & Water, Inc.

Lauren Layne – Baker Manock & Jensen

1. Call to Order/Roll Call

Aaron Barcellos/Pacheco WD called the meeting to order at 10:02 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. Committees to Consider Recommendation for Subbasin Coordination Committee to Approve a List of Projects for the SGMA Round 2 Grant Application, Brodie

Following a discussion on the uncertainty regarding DWR's project selection and approval criteria, the Committees each considered the recommendation for the representatives to the Subbasin Coordination Committee to approve the List of Projects for inclusion in the Subbasin SGMA Round 2 Grant Application. Maria Encinas/City of Patterson provided the motion for the Northern Management Committee and Vince Lucchesi/Patterson Irrigation District seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present. Steve Stadler/San Luis Water District provided the motion for the Central Management Committee and Juan Cadena/Mercy Springs Water District seconded. The Central Management Committee voted by roll call; the motion was passed unanimously by those present.

4. Committees to Consider Recommendation for Subbasin Coordination Committee to Approve a Lead Applicant for the SGMA Round 2 Grant Application, Brodie

The Committees discussed attributes of potential Subbasin GSAs to serve as the lead applicant, and proposed to authorize the Coordination Committee representatives to approve the proposed Subbasin applicant. Bobby Pierce/West Stanislaus Irrigation District provided the motion for the Northern Management Committee and Vince Lucchesi/PID seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present. Randy Miles/Eagle Field Water District 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 Consider Recommendation for Subbasin Coordination Committee to Approve a Cost Share Split for SGMA Round 2 Grant Application Preparation Expenses, Brodie

The Committees discussed the recommendation from the Subbasin Coordination Committee to apportion the grant application preparation costs on the basis of total dollar amount requested by each participating GSA. Discussion included a suggestion that future cost share splits be based on level of effort required to complete the tasks. Lacey McBride/Merced County provided the motion for the Northern Management Committee and Maria Encinas/CP seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present. Steve Stadler/SLWD provided the motion for the Central Management Committee and Danny Wade/Fresno Slough Water District-Tranquillity Irrigation District seconded. The Central Management Committee voted by roll call; the motion was passed unanimously by those present.

6. **Future Meetings**

The Committees discussed the list of upcoming meetings and proposed to combine the two meetings proposed for October 27th and November 14th into a single meeting on November 14th.

- a. Northern & Central Regions Management Committees – Upcoming Meetings
 - i. Monday November 14th, 2022 at 1:00 PM
 - ii. Wednesday December 14th, 2022 at 9:00 AM

7. **ADJOURNMENT**

Aaron Barcellos adjourned the meeting at 10:49 AM.

DRAFT

	A	B	C
1	IRWM Proposition 1 Round 1		
2	Amount Paid		
3	Administration	\$ 9,000.00	
4	City of Huron	\$ 584,974.57	
5	NVRRWP-Turlock	\$ 45,000.00	
6	WSID Pumping Plant	\$ -	
7	Orestimba Creek	\$ 404,632.00	
8	Broadview Aquifer	\$ 145,317.82	
9	Total	\$ 1,188,924.39	
10			
11	Amount Remaining		
12	Administration	\$ 1,000.00	
13	City of Huron	\$ 65,025.43	
14	NVRRP-Turlock	\$ -	
15	WSID Pumping Plant	\$ 809,264.00	
16	Orestimba Creek	\$ 404,632.00	
17	Broadview Aquifer	\$ 663,945.18	
18	Total	\$ 1,943,866.61	
19			
20	Prop 1/Prop 68 SGMA Plan Development		
21	Amount Paid		
22	Administration	\$ 65,757.08	
23	Technical Assistance	\$ 841,686.85	
24	Generic DMS	\$ 178,500.00	
25	N-C Region GSP	\$ 534,291.00	
26	Grassland GSP	\$ 199,118.00	
27	Farmers GSP	\$ 166,802.00	
28	Aliso GSP	\$ 197,655.00	
29	Fresno GSP	\$ 249,171.00	
30	SJREC GSP	\$ 342,894.00	
31	Well Census	\$ 100,000.00	
32	Subsidence Study	\$ 91,681.50	
33	Total	\$ 2,967,556.43	
34			
35	Amount Remaining		
36	Administration	\$ 10,841.92	
37	Technical Assistance	\$ 158,313.15	
38	Generic DMS	\$ -	
39	N-C Regions GSP	\$ -	
40	Grassland GSP	\$ -	
41	Farmers GSP	\$ -	
42	Aliso GSP	\$ -	
43	Fresno GSP	\$ -	
44	SJREC GSP	\$ -	
45	Well Census	\$ -	
46	Subsidence Study	\$ 8,318.50	
47	Total	\$ 177,473.57	

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2022 - FEBRUARY 28, 2023

SGMA Round 1 Implementation Grant - FY23 Grant Application Expenses Proposed Allocation

		Total	ISW & GDE Monitoring and Study	Data Gaps and Monitoring	Canal Lining Projects	Recharge Projects	Efficiency and Reclamation		
DIVISION 1									
	%	\$ 68,590	\$ 3,307	\$ 5,749	\$ 19,149	\$ 21,238	\$ 19,147	\$ -	\$ -
1. Banta-Carbona ID	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2. City of Tracy	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
3. Del Puerto Water District (DPWD 52,570 ac + Oak Flat 4,503 ac)	1.667%	\$ 7,369	\$ 241	\$ 310	\$ 3,409	\$ 3,409	\$ -	\$ -	\$ -
<i>3A. Del Puerto (92% of DPWD GSA Cost)</i>	<i>0.000%</i>	<i>\$ 6,780</i>	<i>\$ 222</i>	<i>\$ 285</i>	<i>\$ 3,136</i>	<i>\$ 3,136</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>
<i>3B. Oak Flat (8% of DPWD GSA Cost)</i>	<i>0.000%</i>	<i>\$ 590</i>	<i>\$ 19</i>	<i>\$ 25</i>	<i>\$ 273</i>	<i>\$ 273</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>
4. Patterson Irrigation District (PID 13,067 ac + Twin Oaks 2,629 ac)	1.667%	\$ 2,067	\$ 106	\$ 85	\$ 938	\$ 938	\$ -	\$ -	\$ -
5. Byron Bethany Irrigation District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6. West Stanislaus ID (WSID 21,299 ac + Grayson/Westley 246 ac)	1.667%	\$ 2,816	\$ 125	\$ 117	\$ 1,287	\$ 1,287	\$ -	\$ -	\$ -
Total Division 1	5.000%	\$ 12,253	\$ 473	\$ 512	\$ 5,634	\$ 5,634	\$ -	\$ -	\$ -
DIVISION 2									
1. Panoche Water District	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
2. San Luis Water District	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
3. Westlands Water District (1)	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4. Charleston Drainage District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5. Panoche Drainage District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6. Pleasant Valley	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Division 2	1.389%	\$ 3,472	\$ 134	\$ 146	\$ 1,596	\$ 1,596	\$ -	\$ -	\$ -
DIVISION 3									
1. Central California Irrigation District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2. Firebaugh Canal Water District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
3. Grassland Water District	16.667%	\$ 552	\$ 552	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4. HMRD #2131	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5. Columbia Canal Company (Friend Member)	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6. Camp 13 Drainers	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Division 3	16.667%	\$ 552	\$ 552	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
DIVISION 4									
1. San Benito County Water District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2. Santa Clara Valley Water District (2)	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Division 4	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
DIVISION 5									
1. Broadview Water District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2. Eagle Field Water District	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
3. Fresno Slough WD	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
4. James Irrigation District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5. Laguna Water District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6. Mercy Springs Water District	0.694%	\$ -	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
7. Oro Loma Water District	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
8. Pacheco Water District	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
9. Reclamation District 1606	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
10. Tranquillity ID	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
11. Turner Island Water District	0.000%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Division 5	3.472%	\$ 8,679	\$ 401	\$ 438	\$ 4,788	\$ 4,788	\$ -	\$ -	\$ -
OTHER									
1. San Joaquin River Exchange Contractors**	16.667%	\$ 21,788	\$ 552	\$ -	\$ -	\$ 2,089	\$ 19,147	\$ -	\$ -
2. Northwestern Delta Mendota Subbasin GSA (Stan. Cty 56,766 ac + Merced Cnty 3,035 ac)	1.667%	\$ 7,395	\$ 251	\$ 325	\$ 3,572	\$ 3,572	\$ -	\$ -	\$ -
<i>2a. Merced County (5% of Northwestern DM GSA Cost)</i>		<i>\$ 370</i>	<i>\$ 13</i>	<i>\$ 16</i>	<i>\$ 179</i>	<i>\$ 179</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>
<i>2b. Stanislaus County (95% of Northwestern DM GSA Cost)</i>		<i>\$ 7,025</i>	<i>\$ 239</i>	<i>\$ 309</i>	<i>\$ 3,393</i>	<i>\$ 3,393</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>
3. City of Patterson GSA	1.667%	\$ 843	\$ 76	\$ 33	\$ 367	\$ 367	\$ -	\$ -	\$ -
4. Fresno County (Fresno County Management Area A/E)	17.361%	\$ 2,288	\$ 619	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
5. Merced County (Central DM Portion)	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
6. Santa Nella County Water District	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
7. Aliso Water District	16.667%	\$ 4,556	\$ 552	\$ 4,003	\$ -	\$ -	\$ -	\$ -	\$ -
8. Farmers Water District	16.667%	\$ 552	\$ 552	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
9. Widren GSA	0.694%	\$ 1,736	\$ 67	\$ 73	\$ 798	\$ 798	\$ -	\$ -	\$ -
Total Other	22.083%	\$ 42,631	\$ 2,805	\$ 4,653	\$ 7,131	\$ 9,220	\$ 19,147	\$ -	\$ -
	48.61%	\$ 69,647	\$ 4,364	\$ 5,749	\$ 19,149	\$ 21,238	\$ 19,147	\$ -	\$ -

**Note: San Joaquin River Exchange Contractors to allocate to GSP Region participants.

Call with DWR on 5 Year Update Requirements
10/5/22

Look at the legislation to see what is required (Section 356.4)

Address all requirements contained in the regulation regarding the updates. Be sure to look at any follow up questions on individual bullet points.

Things DWR will focus on:

- Did we address the recommended corrective actions? How?
- Are we meeting our five year interim milestones? Why or why not? Have there been any exceedances or undesirable results? How are we responding to those exceedances or URs?
- Use data from your submitted annual reports, as applicable, when updating aspects of the Plan (MOs, MTs, URs). Use annual report data as you are able to tell the full story of how you are meeting SGMA overall goals and your subbasin's interim milestones.
- If you change parts of the GSP or Common Chapter in response to comments, mention it within the text of the updates.

Reach out for meetings with DWR staff similar to what we did with GSP revisions, especially in cases like not making changes if we miss 5 year interim goals or exceed MTs. We'll have to justify to them why not before trying to make the case on paper.

Data from the submitted annual reports should be the focus of the updates, from basin setting to the Water Budget and Sustainable Yield all the way through to SMCs, MTs, MOs, and URs.

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§ 356.4. Periodic Evaluation by Agency.

23 CA ADC § 356.4

Barclays Official California Code of Regulations

Barclays California Code of Regulations

Title 23. Waters

Division 2. Department of Water Resources

Chapter 1.5. Groundwater Management

Subchapter 2. Groundwater Sustainability Plans

Article 7. Annual Reports and Periodic Evaluations by the Agency

23 CCR § 356.4

§ 356.4. Periodic Evaluation by Agency.

Currentness

Each Agency shall evaluate its Plan at least every five years and whenever the Plan is amended, and provide a written assessment to the Department. The assessment shall describe whether the Plan implementation, including implementation of projects and management actions, are meeting the sustainability goal in the basin, and shall include the following:

- (a) A description of current groundwater conditions for each applicable sustainability indicator relative to measurable objectives, interim milestones and minimum thresholds.
- (b) A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions.
- (c) Elements of the Plan, including the basin setting, management areas, or the identification of undesirable results and the setting of minimum thresholds and measurable objectives, shall be reconsidered and revisions proposed, if necessary.
- (d) An evaluation of the basin setting in light of significant new information or changes in water use, and an explanation of any significant changes. If the Agency's evaluation shows that the basin is experiencing overdraft conditions, the Agency shall include an assessment of measures to mitigate that overdraft.
- (e) A description of the monitoring network within the basin, including whether data gaps exist, or any areas within the basin are represented by data that does not satisfy the requirements of Sections 352.4 and 354.34(c). The description shall include the following:
 - (1) An assessment of monitoring network function with an analysis of data collected to date, identification of data gaps, and the actions necessary to improve the monitoring network, consistent with the requirements of Section 354.38.
 - (2) If the Agency identifies data gaps, the Plan shall describe a program for the acquisition of additional data sources, including an estimate of the timing of that acquisition, and for incorporation of newly obtained information into the Plan.
 - (3) The Plan shall prioritize the installation of new data collection facilities and analysis of new data based on the needs of the basin.
- (f) A description of significant new information that has been made available since Plan adoption or amendment, or the last five-year assessment. The description shall also include whether new information warrants changes to any aspect of the Plan, including the evaluation of the basin setting, measurable objectives, minimum thresholds, or the criteria defining undesirable results.
- (g) A description of relevant actions taken by the Agency, including a summary of regulations or ordinances related to the Plan.
- (h) Information describing any enforcement or legal actions taken by the Agency in furtherance of the sustainability goal for the basin.
- (i) A description of completed or proposed Plan amendments.
- (j) Where appropriate, a summary of coordination that occurred between multiple Agencies in a single basin, Agencies in hydrologically connected basins, and land use agencies.

(k) Other information the Agency deems appropriate, along with any information required by the Department to conduct a periodic review as required by Water Code Section 10733.

Credits

NOTE: Authority cited: Section 10733.2, Water Code. Reference: Sections 10727.2, 10728, 10728.2, 10733.2 and 10733.8, Water Code.

HISTORY

1. New section filed 8-15-2016 as an emergency exempt from review by OAL pursuant to Water Code section 10733.2(d); operative 8-15-2016. Pursuant to Water Code section 10733.2(d), these regulations shall remain in effect until revised by the Department of Water Resources (Register 2016, No. 34).

This database is current through 9/23/22 Register 2022, No. 38.

Cal. Admin. Code tit. 23, § 356.4, 23 CA ADC § 356.4

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Draft Timeline: 2025 Plan Update for Northern and Central GSA

- December 14, 2022: Finalize recommended changes to draft 2025 Update timeline. Initiate task/subtask discussions/assignments for individual GSAs and consultants. Request input on changes to the Coordination Agreement.
- December 14, 2022: Staff submits draft of example “simplified language” (from Common Chapter) for possible adjustments to 2025 Plan update. Review updated draft budgets for funds 64 and 65. Review of items needed for Annual Report. Review statutory requirements for the 2025 Plan updates and DWR’s latest Plan update recommendations.
- January 26, 2023: Continue GSP draft simplified language review and make recommendations. Begin discussions on how to address public comments received on GSP and revisions in the 2025 Plan Updates. Review of any released DWR GSP Determinations on other Subbasins for possible relevance to D-M Subbasin. Draft a workplan for 2025 GSP updates including assignments to specific GSAs and consultants.
- February 23, 2023: Review of any released DWR GSP Determinations on other Subbasins for possible relevance to D-M Subbasin. Begin review of Annual Report Data for the 2025 Plan Updates. Refine 2025 GSP update workplan.
- March 23, 2023 Conduct expedited review of DWR comments and recommended actions on revised GSPs and Common Chapter.
- April 27, 2023: Finalize review of DWR comments and recommended actions and incorporate into 2025 GSP update workplan. Finalize workplan including specific assignments for individual GSAs, GSP groups, and consultant tasks. Draft RFP for selecting Plan Update consultant. Schedule meeting with DWR to discuss Plan Update process and procedures.
- May 1, 2023: Issue RFP for Northern & Central Delta-Mendota Subbasin GSP 2025 Update. Staff/GSA/group analysis of “Basin” and “Setting” Chapters and DWR recommended actions. Further review of staff “simplified” text approach. Solicit feedback from DWR on simplified approach.
- May 31, 2023: Deadline for 2025 Update RFP Responses from Consultants. Continue discussions on Coordination Agreement revisions.
- June 1-15 2023: Subcommittee meets to select consultant(s) to interview for 2025 NCDMS Plan Update. Interview consultant(s) for 2025 NCDM GSP Update.

- June 22, 2023: Select consultant to perform specific tasks for 2025 NCDM GSP Update. Execute Fiscal Year task order. Consultant performs analysis of (any) DWR Plan Update guidance documents, recommended actions, and task/subtask lists and assignments including responses to comments. If needed, schedule meeting with DWR staff to discuss Plan Update items.
- July 27, 2023: Deadline for consultant data adjustments for 2025 CC Update “Plan Area” and “Settings” Chapters. Begin outline of responses to “general comments.” Begin review and discussions of Subbasin Water Budget and Sustainable Yield with Coordination Committee/TWG. Review of staff “simplified language” proposed changes. Review GSA/GSP group, staff, and consultant task list and timelines.
- August 24, 2023: Continue Water Budget and Sustainable Yield discussions with CC/TWG. Address DWR recommended actions. Finalize WQ section if able and begin discussions on CC Interconnected Surface Water SMC and Table. Meet with DWR to discuss Update progress and proposed changes.
- September 28, 2023: Finish water budget and sustainable yield with CC/TWG and incorporate into NCDM GSP. Incorporate WQ SMC and Table (if not already done) and/or Interconnected Surface Water SMC and table (see above). If able, begin discussions on Chronic Lowering of Groundwater. Address DWR recommended actions.
- October 26, 2023: Finalize Interconnected Surface Water SMC and Table (if not already done) and/or Chronic Lowering of Groundwater SMC and Table. Review tasks lists for GSAs, GSP groups, staff, and consultants for schedule. Review and identify any new priorities for next fiscal year’s budget. Address DWR recommended actions. Meet with DWR to discuss Update progress and proposed changes. Review GSA/GSP group, staff, and consultant task list and timelines.
- November 30, 2023: Finalize Chronic Lowering of groundwater SMC and table. Begin discussions of Reduction in Groundwater Storage SMC and Table. Continue review of budget. Address DWR recommended actions. Review items needed for Annual Report.
- December 11, 2023: Continue discussions of Reduction in Storage SMC and Table. Approve next fiscal year’s budget. Continue to review simplified language efforts. Address DWR recommended actions (if needed). Meet with DWR to discuss Update progress and changes.

January 25, 2024:	Finalize Reduction in Storage SMC and Table. Begin discussions of SMC and Table for Subsidence. Address DWR recommended actions (if needed). Review staff edits for simplified language. Review GSA/GSP group, staff, and consultant task list and timelines.
February 22, 2024:	Continue discussions of SMC and Table for Subsidence. Address DWR recommended actions (if needed). Meet with DWR to discuss Update progress and changes.
March 28, 2024:	Finalize SMC and Table for Subsidence. Begin planning public meetings on 2025 update. Finalize action on DWR recommended actions (if needed). Create draft presentation on Update changes. Meet with DWR to discuss Update progress and changes.
April 25, 2024:	Buffer month for tying up loose ends. Possibly begin public meeting roadshow. Review simplified language changes and refine draft presentation. Review GSA/GSP group, staff, and consultant task list and timelines.
May 22, 2024:	Begin holding public meetings on 2025 GSP update in Cooperation with the Coordination Committee. Note attendance and comments. Final review of GSA/GSP group task assignments and completion.
June 10, 2024:	Continue public meetings. Finalize draft Coordination Agreement revisions. Continue GSP simplified language revisions. Meet with DWR to discuss Update progress and changes.
July 15, 2024:	Continue Public Meetings. Continue individual GSP revisions. Coordination agreement out for GSA/GSP approval.
August 12, 2024:	Deadline for final review of CC, GSPs, and response to comments. Continue public meetings.
September 2024:	Final approval of GSP 2025 Update.
October 2024:	Begin public notices, public hearings, and formal approval at GSA level for final 2025 Common Chapter and individual GSP updates.
January 23, 2025:	Submit 2025 GSP Updates including Common Chapter, other appendices, and Coordination Agreement.

Table 1: Categorized Public Comments Received on Groundwater Sustainability Plan for the Northern and Central Delta-Mendota Regions

Topic	Comment ID (#)	Date Received	Commenter / Organization	GSP Chapter / Section Title	Provided Comment (a)	Proposed Response Category
Interconnected Surface Water & GDEs	1	03/11/2020	California Department of Fish and Wildlife	Basin Setting 5.3.7.2	The narrative describing the basin's interconnected surface water conditions lacks specifics and does not map surface water-groundwater interconnectivity. The interconnected surface water (ISW) conditions narrative includes estimations of the quantity of streamflow depletions as specified in 23 CCR § 354.16(f), but it does not provide specifics on how the identified resources on page 5-174 were used to determine interconnectivity, nor does the plan provide timing of depletions.	3 – Revise GSP Add map of ISW reaches and clarifying sentence(s) for how identified resources were used.
	2	03/11/2020	California Department of Fish and Wildlife	Basin Setting 5.3.7.2	West-side streams in the Delta Mendota Basin are also characterized as losing their "flows to the underlying vadose zone (net-losing streams)," and therefore, they are not considered ISW (page 5-173). 'Losing streams' can still be interconnected with surface water if there is a continuous saturated layer connecting the stream to the groundwater (Barlow and Leake 2012). The GSP uses the term 'vadose zone,' meaning an unsaturated zone, but offers no evidence of vadose zone identification or documented stream disconnection.	3 – Revise GSP Cite source that creeks overlies a vadose zone.
	3	03/11/2020	California Department of Fish and Wildlife	SMC 6.3.1 and 6.3.6	Groundwater level and interconnected surface water sustainable management criteria demonstrate limited consideration of undesirable results for environmental beneficial uses and interconnected surface waters. Groundwater Level 'undesirable results' and 'effects of undesirable results' do not evaluate specific impacts to environmental beneficial users such as GDEs (see page 6-4), nor do these sections explicitly identify fish and wildlife or habitat as beneficial users of interconnected surface water. Furthermore, depletions of interconnected surface water 'undesirable results' and 'effects of undesirable results' do not specify potential adverse impacts to environmental beneficial users other than to note the potential failure to support regulatory environmental requirements (page 6-34).	3 – Revise GSP Use quantitative metrics for effects on beneficial users when UR's are reached (e.g., X% of wells dewatered, Y AF of surface water depletions).
	4	03/11/2020	California Department of Fish and Wildlife	Basin Setting 5.3.7.6	Methods applied to the Natural Communities Commonly Associated with Groundwater (NCCAG) dataset to identify potential GDEs require further evaluation. <u>Depth to Groundwater:</u> Evaluating only areas with a depth to groundwater greater than 30 feet in Spring 2015 relies on a single-point-in-time baseline hydrology, specifically a point in time that is several years into a historic drought when groundwater levels were trending significantly lower due to reduced surface water availability. Exclusion of potential GDEs based on this singular groundwater elevation measurement is unjustified because it does not consider representative climate conditions (i.e., seasons and a range of water type years) and it does not account for GDEs that can survive a finite period of time without groundwater access (Naumburg et al. 2005), but that rely on groundwater table recovery periods for long term survival. <u>Use of a Single Resource Reference:</u> The CDWR Natural Communities Commonly Associated with Groundwater (NCCAG) Dataset web page (https://gis.water.ca.gov/app/ncdatasetviewer/sitedocs/) states: "The data included in the Natural Communities dataset do not represent DWRs determination of a GDE. However, the Natural Communities dataset can be used by GSAs as a starting point (emphasis added) when approaching the task of identifying GDEs within a groundwater basin."	4 – Identify Plan to Address as Part of GSP Update
	5	03/11/2020	California Department of Fish and Wildlife	Monitoring Network 7.2.5.6.6	Identification and verification of ISW and GDEs would benefit from additional shallow groundwater monitoring. The GSP indicates that four new monitoring wells will be placed along the San Joaquin River to monitor for depletions of ISW. Additional monitoring to ground-truth the presence of ISW, particularly along west side streams where the GSP identified streams as losing their flow to the underlying vadose zone, would benefit ISW and GDE verification.	2 – Address with Ongoing Efforts

Proposed Response:

Category 1 – Addressed in GSP or Not Required by SGMA. Prepare response to comments letter and note how topic is addressed in GSP, or that it is not required.

Category 2 – Address with Ongoing Effort. Potential commitment for acquisition of additional data and more complete response to comments in the 5-Year GSP Update. Prepare response to comments letter and describe in-progress efforts and actions to address comment and concern (including ISW well installation, subsidence study, data collection, USGS/USBOR groundwater modeling, further development of projects to meet SGMA objectives, requests for grant funding, etc.).

Category 3 – Revise GSP. Revise GSP, as appropriate using available data, and resubmit to DWR within 180-day statutory deadline.

Category 4 – Identify Plan to Address as Part of GSP Update. Comment cannot be addressed by ongoing efforts or within the 180-day deadline. A plan to address the comment will be identified in the 2025 GSP update.

Abbreviations:

GDE = groundwater dependent ecosystem
GSP = Groundwater Sustainability Plan for the Northern & Central Delta-Mendota Subbasins dated November 2019.
ISW = interconnected surface water
SMC = sustainable management criteria

Footnotes:

(a) Comments transcribed from public comment letters downloaded from DWR SGMA portal on 17 November 2021. Comments from DWR on the submitted GSP are not yet available.

Table 1: Categorized Public Comments Received on Groundwater Sustainability Plan for the Northern and Central Delta-Mendota Regions

Topic	Comment ID (#)	Date Received	Commenter / Organization	GSP Chapter / Section Title	Provided Comment (a)	Proposed Response Category
Interconnected Surface Water & GDEs	6	04/06/2020	National Marine Fisheries Service	Basin Setting 5.3.7.6	The GDE screening standards exclude any areas with a depth to groundwater greater than 30-feet in Spring 2015. The reasoning for this exclusion appears to concern oak tree rooting depth. However, judging oak rooting conditions based upon Spring 2015 groundwater depths is likely inappropriate, since 2015 coincided with the fourth year of California’s historic 2011-2016 drought. Spring groundwater elevations during 2015 were likely well below average, and thus not representative of past or future conditions. Focusing analysis on this time period will likely exclude significantly more area from GDE consideration as compared to using more representative groundwater elevations (i.e., those not associated with a severe drought).	1 – Already Addressed in GSP or Not Required by SGMA 30-ft depth to water is from Rhodes et. al, 2018; 2015 baseline is appropriate for SGMA.
	7	04/06/2020	National Marine Fisheries Service	Basin Setting 5.3.8	The NCCAG-based process used by the NCDMR GSP Group, as well as their identified standards for screening potential GDEs for plan consideration, is based largely on identifying wetland and vegetation features, and includes little analysis concerning aquatic species and habitat affected by streamflow depletion. The appropriate method to determine whether pumping is having “significant and unreasonable adverse impacts” on beneficial uses of surface water is to understand the level of impact (i.e., volume of streamflow depletion) and how habitat quality and functionality change because of that impact. Further data is required throughout the Delta Mendota Subbasin to establish localized relationships between streamflow depletion and the resulting instream habitat characteristics.	2 – Address with Ongoing Efforts
	8	04/06/2020	National Marine Fisheries Service	SMC 6.2	No correlation or linkage between a “significant increase in the depletion of surface water” and significant, unreasonable adverse impacts on beneficial uses of surface water, is presented in the final GSP. Thus, this threshold is inconsistent with SGMA regulations and guidance, which require consideration of not only the rate or volume of streamflow depletion, but more importantly the impact the depletion may have on beneficial uses of surface water.	2 – Address with Ongoing Efforts
	9	04/06/2020	National Marine Fisheries Service	SMC 6.3.6	The final GSP proposes to utilize only two existing gauges located along the San Joaquin River during their 2020-2025 investigation into the location, timing, and quantity of surface water depletion. The analysis would be used to establish numeric minimum thresholds for inclusion in the first 5-year GSP Update. Because the gauges, shown in Figure 6-7, are located directly next to each other, and will likely inform the groundwater/streamflow dynamic at just one discreet section along the San Joaquin River, NMFS believes additional gauge locations are necessary. We recommend that a plan for locating and implementing the additional gauges be clearly explained within the final GSP.	2 – Address with Ongoing Efforts
	10	04/06/2020	National Marine Fisheries Service	SMC 6.3.6.3	A measurable objective for streamflow depletion of “no increased depletions of surface water as a result of groundwater pumping” is inappropriate, since the minimum threshold appears to have no linkage between streamflow depletion and impacts to beneficial uses of surface water.	2 – Address with Ongoing Efforts

Proposed Response:

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Topic	Comment ID (#)	Date Received	Commenter / Organization	GSP Chapter / Section Title	Provided Comment (a)	Proposed Response Category
Interconnected Surface Water & GDEs	11	05/15/2020	California Sportfishing Protection Alliance	Basin Setting 5.3.7	<p>These Plans fails to use the best available information to identify the geographic locations where, and times of year when, groundwater pumping depletes or is likely to deplete stream flow. Also, to the extent there are legitimate “data gaps,” the Plans fail to include a plan or protocol to fill these gaps. While the Sustainable Groundwater Management Act (SGMA) contemplates the possibility of “data gaps,” it does not authorize the wholesale “kick the can down the road” approach taken by these Plans.</p> <p>There are readily available methodologies for identifying stream reaches at risk of groundwater depletion from groundwater pumping. Mr. Kamman’s comments describe one such method previously used by the State Water Resources Control Board for mapping areas where groundwater pumping is likely to cause depletion of surface flows, known as Potential Stream Depletion Areas (“PSDA”).</p> <p>GSA’s cannot avoid location specific characterizations of the risk of undesirable results because someone else has not already developed the information.</p> <p>The Plan fails to describe any protocol to obtain usable information to identify areas and times with a high risk of groundwater pumping induced stream flow depletion.</p> <p>The PSDA methodology and resulting maps represent the best information available for this purpose. Yet the Plan fails to adopt the methodology or the resulting maps; and fails to explain why they do not represent the best information available.</p>	2 – Address with Ongoing Efforts
	12	05/15/2020	California Sportfishing Protection Alliance	SMC 6.3.6	...regarding areas where the groundwater table has already dropped below the elevation of hydrologic connection to stream channels due to pumping groundwater. In these areas, the continuing loss of stream flow to groundwater remains an undesirable result. The Plans gives no thought to changing these conditions to recover hydrologic connection between such channels and their historical sources of groundwater derived base flow.	1 – Already Addressed in GSP or Not Required by SGMA Not required for GSAs to correct pre-2015 conditions.
	13	05/15/2020	California Sportfishing Protection Alliance	Topic not a component of the GSP	The streams and rivers in this subbasin are home to several species of endangered or special concern salmonids on the verge of extinction. The failure of the Plans to describe how they will avoid further harm to these species and contribute to their recovery from the brink of extinction represents a failure to comply with SGMA’s requirement to avoid undesirable results by establishing minimum thresholds, measurable objectives, and interim milestones supported by the best available information and best available science.	1 – Already Addressed in GSP or Not Required by SGMA Not required by SGMA.
	14	05/15/2020	USBR – San Joaquin River Restoration Program	Basin Setting 5.3.7.6	The SJRRP recommends that professional judgement also be used to evaluate potential GDEs beyond the 100-foot buffer. For example, at Hills Ferry Road, a 100-foot buffer fails to include most of the mature floodplain trees just upstream of the bridge. Maintaining healthy floodplain vegetation during the dry season (when it is groundwater-dependent) is important for sustaining that habitat so that it is available, high-quality salmon rearing habitat during high flows.	3 – Revise GSP Clarify how the 100-foot Caltrans construction buffer correlates to GDE identification, or remove this criteria for filtering the GDE dataset.
	15	05/15/2020	USBR – San Joaquin River Restoration Program	Basin Setting 5.3.7.6	The text and figures on GSP pages 5-175 to 5-178 (Figures 5-118 & 5-119) discussing possible vs. confirmed GDEs requires clarification. The text states, “Confirmed GDEs have been grouped into larger polygons based on proximity and aquifer connection,” and “Figure 5-118 and Figure 5-119 summarize the results of the GDE analysis for the Subbasin...” however confirmed GDEs don’t seem to be distinguished from possible GDEs on the figures. Figure legends use the terminology “possible GDE,” implying they do not show confirmed GDEs. In the last three paragraphs on page 5-176, it is unclear if the terms “confirmed GDE” and “possible GDE” are being used interchangeably.	3 – Revise GSP Use one term, or clarify the difference between “confirmed” and “possible” GDEs.

Proposed Response:

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Category 2 – Address with Ongoing Effort. Potential commitment for acquisition of additional data and more complete response to comments in the 5-Year GSP Update. Prepare response to comments letter and describe in-progress efforts and actions to address comment and concern (including ISW well installation, subsidence study, data collection, USGS/USBOR groundwater modeling, further development of projects to meet SGMA objectives, requests for grant funding, etc.).

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	16	05/15/2020	USBR – San Joaquin River Restoration Program	Sustainability Implementation 7.2.5.6.6	With the exception of SMN, monitoring sites are downstream of the Restoration Area (Fig 7-11; Table 7-11); however, where monitoring activities may overlap, the SJRRP is available for any coordination and communication that might help to augment the available information and result in well-supported decisions that will protect the SJR from potential groundwater pumping impacts.	2 – Address with Ongoing Efforts
Interconnected Surface Water & GDEs	17	05/15/2020	American Rivers	Basin Setting 5.3.7.1	The GSP asserts that creeks that drain the east side of the basin do not represent areas of potential Groundwater Dependent Ecosystems (GDEs) because they are ephemeral and/or losing streams. This statement is incorrect since ephemeral and losing streams can be ISWs and potentially representative of GDEs. Furthermore, Figure 5-64 (in Section 5.2.9.4) identifies six historic springs on the southwest corner of the basin, near Little Panoche Creek, which are noted as groundwater discharge areas. The GSP should evaluate ISWs in ephemeral streams, losing streams and springs using scientific methods.	3 – Revise GSP Provide further clarification for how ISW reaches were identified.
	18	05/15/2020	American Rivers	Basin Setting 5.3.7.1	It is unclear how the GSP identifies ISWs, other than “from a compendium of sources.” This GSP should explain the how [sic] it identified ISWs from the literature and document the underlying methodology.	3 – Revise GSP See comment #2.
	19	05/15/2020	American Rivers	Basin Setting 5.3.7.1	A figure should be produced that shows the ISW locations in the basin.	3 – Revise GSP See comment #1.
	20	05/15/2020	American Rivers	SMC 6.3.6	The GSP bases minimum thresholds for depletion of ISWs on a yet-to-be-determined percent increase in surface water depletions along interconnected stretches of surface water as a result of groundwater pumping. We are concerned with this approach, since no planned methodology is given. It is unclear how surface water depletions will be measured, particularly since connections between surface water and groundwater were not established nor discussed in the GSP.	2 – Address with Ongoing Efforts
	21	05/15/2020	American Rivers	Sustainability Implementation 7.2.5.6	The GSP states that depletions of surface water will be assessed using groundwater levels as a proxy. However, the establishment of ISWs was not based on groundwater levels developed in the GSP, so it is not clear how monitoring groundwater levels will tie into the baseline conditions.	2 – Address with Ongoing Efforts
	22	05/15/2020	American Rivers	Sustainability Implementation 7.2.5.6.5	The GSP is proposing to establish monitoring wells in four more locations along the San Joaquin River. If ISWs are determined in other locations using the more rigorous methodology that we recommend, more shallow monitoring wells should be utilized or installed to monitor surface water depletions in these locations.	2 – Address with Ongoing Efforts
	23	05/15/2020	The Nature Conservancy	Basin Setting 5.3.7	Improvements should be made to identify gaining and losing reaches and/or to account for the spatial and temporal variations in stream depletions that are inherent with California’s Mediterranean climate. Our analysis also indicates that the streams stemming from the west side of the sub-basin are likely disconnected. However, these streams may be interconnected with riparian or perched aquifers, so additional monitoring should be required to confirm disconnection. Also, any area where a lack of shallow groundwater data makes the determination of ISWs uncertain should be identified as a data gap rather than being assumed to be disconnected.	4 – Identify Plan to Address as Part of GSP Update
	24	05/15/2020	The Nature Conservancy	Basin Setting 5.3.7.6	TNC applauds the documentation of potential wetland and vegetative GDEs from TNC’s and DWR’s NC Dataset Viewer and the list of freshwater species for the Delta-Mendota Subbasin in the GSP. TNC recommends that the GSA utilize groundwater level information to support the establishment of GDEs and elaborate on the correlation of groundwater level and plant physiological data to exclude potential GDEs. Although we appreciate the inclusion of this information; the information was not analyzed, elaborated on, no data gaps were identified, and no monitoring plan was put in place to specifically improve the understanding of GDEs.	2 – Address with Ongoing Efforts
	25	05/15/2020	The Nature Conservancy	SMC 6.3	We were disappointed to see that the Sustainable Management Criteria do not describe potential impacts on environmental users of groundwater and or confirm that minimum thresholds for interconnected surface waters avoid adverse impacts to environmental beneficial users of surface water, as required under SGMA. The minimum thresholds do not describe how a decline in groundwater level will affect GDEs and ISWs.	2 – Address with Ongoing Efforts

Proposed Response:

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Category 2 – Address with Ongoing Effort. Potential commitment for acquisition of additional data and more complete response to comments in the 5-Year GSP Update. Prepare response to comments letter and describe in-progress efforts and actions to address comment and concern (including ISW well installation, subsidence study, data collection, USGS/USBOR groundwater modeling, further development of projects to meet SGMA objectives, requests for grant funding, etc.).

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	26	05/15/2020	The Nature Conservancy	Sustainability Implementation 7.2.5.6	We were disappointed to see that the GSP did not include a monitoring for that adequately characterizes the interaction of GDEs and other environmental beneficial users of surface water and groundwater, as required by 23 CCR §354.34. The GSP does not adequately characterize the interaction of GDEs and other environmental beneficial users of surface water and groundwater.	2 – Address with Ongoing Efforts
Interconnected Surface Water & GDEs	27	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Basin Setting 5.3.7.6	While the plan identified potential drinking water users of groundwater, the identification of groundwater dependent ecosystems is incomplete and inconsistent with best practices. The GSP uses an arbitrary 100-foot boundary and relies on “professional judgement and local knowledge” to exclude potential groundwater dependent ecosystems. This method is based on a generalized resource protection zone used by Caltrans to protect surface features and habitats from construction-related impacts, among other things, and is not an appropriate method for evaluating groundwater dependent ecosystems.	2 – Address with Ongoing Efforts
	28	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Sustainability Implementation 7.2.5.6	We recommend the monitoring network plan in the GSP be improved, as it is currently insufficient to evaluate whether impacts on groundwater-dependent ecosystems and communities reliant upon shallow wells will be sufficiently monitored. Specifically, the plan does not include a map overlaying the monitoring wells with the occurrence of disadvantaged communities and groundwater dependent ecosystems to demonstrate that potentially impacted areas are being monitored. The monitoring network also does not adequately characterize the interaction of groundwater dependent ecosystems and other environmental beneficial users of surface water and groundwater. Groundwater dependent ecosystems are potentially located along surface water bodies where no shallow groundwater monitoring is proposed, leaving recognized data gaps unfilled. This lack of information should be identified as a data gap to be filled as part of the expansion of the monitoring network.	2 – Address with Ongoing Efforts
Water Quality	29	03/11/2021	California Department of Fish and Wildlife	Basin Setting 5.3.5	<p>The GSP abdicates responsibility for specific groundwater constituents by implying there is no nexus between some groundwater contaminants and groundwater pumping.</p> <p>The GSP explains that other constituents, including arsenic, are naturally occurring and managed through other regulatory programs, and suggests that because there are no GSA management practices that can be implemented to mitigate for these constituents (page 5-121), the GSP will not analyze and address these constituent issues. Because increases in the concentration of arsenic contamination can result from groundwater pumping, and because GSAs have the authority to manage groundwater pumping, the GSAs have a viable management opportunity to address arsenic contamination in the Delta Mendota Subbasin.</p> <p>Additionally, there are other constituents of concern on the west side of the San Joaquin Valley that were not evaluated by the GSP including selenium and uranium.</p>	3 – Revise GSP Either a) cite sources and make a stronger argument for lack of correlation between concentrations of COCs and groundwater levels, or b) create additional SMCs.
	30	05/15/2020	American Rivers	Basin Setting 5.2.8	<p>[Section 5.2.8] includes a reasonably thorough summary of historical and current information on several key groundwater pollutants. However, for most data discussed and presented in this section, it is unclear what time periods are covered.</p> <p>For example, Figures 5-21, 5-23, 5-25, 5-27, and 5-29 include maximum nitrate concentrations detected over what period? The figures state only “Maximum concentrations are based on all data collected to date for the identified wells” but no start and end dates are provided. Figures 5-22, 5-24, 5-26, 5-28 and 5-30 supposedly include the most recent nitrate collected, but the date range specified is 2000-2014. Surely more recent data than 2014 are available for many of the wells.</p> <p>The same comments apply to the data presentation and discussion for TDS, pesticides, selenium and boron. It appears that these figures may have been taken from an older document and not updated with the most recent data</p>	3 – Revise GSP Clarify dates of data.

Proposed Response:

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Topic	Comment ID (#)	Date Received	Commenter / Organization	GSP Chapter / Section Title	Provided Comment (a)	Proposed Response Category
	31	05/15/2020	American Rivers	Basin Setting 5.2.8 and 5.3.5	Although Sections 5.2.8 and 5.3.5 mention that contaminants such as arsenic and chromium have been detected above MCLs, available data on these constituents is not presented. In addition, although 1,2,3-TCP has also been detected above MCLs in the region, this pollutant is not mentioned in the GSP. The final GSP should include an evaluation of these constituents.	3 – Revise GSP See comment #29.
Water Quality	32	05/15/2020	American Rivers	Basin Setting 5.3.5	Recent analysis does show a link between groundwater pumping and increases in arsenic concentrations elsewhere in the San Joaquin Valley (Tulare Basin) (https://www.nature.com/articles/s41467-018-04475-3). It is not clear that the GSP attempted to look for a causal nexus. A first step would be to evaluate correlations between arsenic concentrations and groundwater levels over time and space.	3 – Revise GSP See comment #29.
	33	05/15/2020	American Rivers	Basin Setting 5.3.5.2	There is ample evidence that other constituents of concern [e.g., arsenic, selenium and hexavalent chromium] could be affected by groundwater management activities included in the GSP, and therefore minimum thresholds should be set for additional constituents. In particular, specific groundwater management activities such as recharge on agricultural lands may accelerate the transport of pollutants such as pesticides through the vadose zone into aquifers, and groundwater depletion may increase arsenic concentrations in pumped water. Under some circumstances, recharge may also result in accelerated movement of plumes towards drinking water wells. Groundwater management activities may also decrease concentrations of pollutants in groundwater in some cases, such as by recharge with relatively clean water, or “pump and fertilize” practices to reduce nitrate concentrations.	3 – Revise GSP See comment #29.
	34	05/15/2020	American Rivers	Basin Setting 5.3.8	[Section 5.3.8] includes no mention of data gaps for water quality. See comments under Section 7.1 for recommendations on data needed to evaluate effects of recharge projects on water quality. Similar data needs should be evaluated to address water quality changes impacted by other groundwater management actions.	2 – Address with Ongoing Efforts
	35	05/15/2020	American Rivers	SMC 6.3.3.2	SGMA requires that minimum thresholds must be set with respect to baseline water quality as of 2015, therefore comparison to 2018 conditions are not acceptable. In addition, minimum thresholds should be set for additional constituents such as arsenic, uranium, chromium, selenium, 1,2,3-TCP, and potentially for specific pesticides pending an adequate review of recent pesticide use data in the region in conjunction with historical data already discussed in Section 5.2.8.2.3.	3 – Revise GSP Reevaluate use of 2018 baseline. 2015 is more appropriate.
	36	05/15/2020	American Rivers	Sustainability Implementation 7.1	<p>The GSP does not include any evaluation of water quality impacts or benefits for any of these potential recharge projects, we recommend that an evaluation be conducted using available data followed by site-specific data collection if necessary.</p> <p>Due to the complexity of existing nitrate contamination and future loading rates, this issue should be evaluated in detail during the planning and design process. This would likely include collection of additional site-specific data.</p> <p>All of the potential recharge locations identified have had fairly low to moderate rates of recent application of pesticides that are on the groundwater protection list due to chemical properties that put them at high risk for transport to groundwater.</p> <p>Given the widespread impact of arsenic in the region, the GSA should consider how to how recharge and other water management activities can be used to mitigate arsenic concentrations in groundwater used as drinking water.</p> <p>It is possible that groundwater recharge may have a beneficial effect in reducing 1,2,3-TCP concentrations through dilution, it is also possible that recharge may accelerate movement of plumes toward existing drinking water wells. Before proceeding with recharge at these locations, an evaluation of how recharge is expected to affect movement of any TCP plumes should be conducted.</p>	2 – Address with Ongoing Efforts
	37	05/15/2020	American Rivers	Sustainability Implementation 7.2.5.4	[Groundwater quality monitoring] wells identified appear to be based on existing monitoring programs in place, representing the lowest level of effort rather than targeted monitoring to achieve GSP objectives regarding evaluation of how groundwater management is affecting water quality. No criteria are presented for selection of monitoring locations.	2 – Address with Ongoing Efforts

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Land Subsidence	38	03/11/2021	California Department of Fish and Wildlife	SMC 6.3.5 and 6.3.5.1.2	<p>An undesirable result for land subsidence is triggered, or considered "significant and unreasonable," for Tranquility Area using a minimum threshold of four (4) feet additional subsidence compared to 2019 benchmark elevations.</p> <p>Cumulative subsidence underlying the wildlife area has caused Department water delivery to flow in reverse. The Department has already experienced undesirable results attributable to subsidence, and any additional subsidence will be significant and unreasonable, therefore the Department does not believe a minimum threshold of four additional feet of subsidence beyond 2019 levels is justifiable.</p> <p>The Department recommends. the GSAs and neighboring GSAs include the Mendota WA as an established subsidence management area and designate the WA with a zero-foot subsidence criterion.</p>	3 – Revise GSP Reconsider what infrastructure is considered critical for subsidence.
	39	05/15/2020	DWR – State Water Project	SMC 6.3.5.2	The GSP states that it will be adopting DWR’s tolerances for additional land subsidence along the California Aqueduct to ensure minimum thresholds are compatible with DWR’s projected operations of the California Aqueduct. However, it is not clear what tolerances and/or operational limits were considered specifically for the California Aqueduct. As such, DWR’s tolerance for additional land subsidence along the California Aqueduct is a critical missing GSP element. A reasonable measurable objective for the Aqueduct would limit the subsidence rate to less than 0.01 ft per year by 2040, and a goal of no subsidence thereafter.	3 – Revise GSP Reconsider minimum thresholds to be compatible with DWR tolerance for subsidence along the California Aqueduct.
	40	05/15/2020	DWR – State Water Project	SMC/Monitoring Network 6.3.5.2 and 7.2.5.5.6	The GSP states “There are no known spatial data gaps identified for the land subsidence monitoring network within the Northern and Central Delta-Mendota Regions”. There is significant lack of monitoring sites in the southern quarter of the basin proximal to the Aqueduct and DWR considers this a significant data gap. The collection of quality monitoring data over time will be critical to delineate the extent of land subsidence along the Aqueduct. The GSP should be updated to include survey data from DWR and a plan to add additional monitoring stations as necessary.	2 – Address with Ongoing Efforts
	41	05/15/2020	DWR – State Water Project	SMC 6.3.5.2	There are no sustainability indicators specifically stated for the California Aqueduct. It appears the same sustainability indicators for the nearby Delta Mendota Canal are assumed, but this needs to be clarified, otherwise it is unclear whether the current plan addresses the effects of land subsidence on the operation and maintenance of the California Aqueduct.	3 – Revise GSP Clarify whether sustainability indicators for DMC are applicable to the California Aqueduct – the GSP implies in previous sections that both the DMC and CA are critical infrastructure, but for setting MTs, the DMC is considered the “primary infrastructure of concern.”
	42	05/15/2020	DWR – Division of Flood Management	SMC 6.3.5.3	<p>Your GSP notes potential flood impacts due to inadequate freeboard on Tranquility Irrigation District management area levees but does not evaluate increase in flood risk. Your GSP does not appear to include an evaluation of the effect of subsidence on flood system capacities, flood management infrastructure, or floodplain inundation areas.</p> <p>DWR-DFM believes there may be opportunities to refine your GSP and consider actions that could mitigate future increases in flood risk. We urge you to consider how future subsidence might generate Undesirable Results in the form of increased flood risk, adjust your GSP’s Minimum Thresholds and Measurable Objectives as necessary to moderate any increased risk, and review projects and management actions that could contribute towards the dual goals of groundwater sustainability and flood management.</p>	2 – Address with Ongoing Efforts

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	43	05/15/2020	Central Valley Flood Protection Board	SMC 6.3.5	The Board is interested in how the GSP is addressing the sustainability indicators, specifically subsidence, which potentially affects the integrity, functionality, and maintenance costs of Federal-State flood control facilities that are regulated by the Board. The Federal-State flood control facilities are considered critical infrastructure by the State. It is unlawful for any person or public agency to interfere with, obstruct the performance, maintenance, or operation of, or otherwise take actions that may adversely affect facilitates of the State Plan of Flood Control, designated floodways, or streams that are regulated by the Board (Wat. Code Sec. 8700). Any reduction in freeboard or activities affecting the integrity, functionality or maintenance of Federal-State flood control works is considered significant and must be avoided.	2 – Address with Ongoing Efforts
	44	05/15/2020	USBR – San Joaquin River Restoration Program	SMC 6.3.5.2	The minimum thresholds for TRID MA should be defined in terms of subsidence rates instead of magnitudes. This is necessary to ensure that the measurable objective remains achievable during the implementation period and will also provide a better measure of progress towards the goal.	3 – Revise GSP § 354.28 (c) (5) “The minimum threshold for land subsidence shall be the rate and extent of subsidence”.
Land Subsidence	45	05/15/2020	USBR – San Joaquin River Restoration Program	SMC 6.3.5.2	For the WSID-PID MA, the GSP should clarify why minimum thresholds relating to lateral distribution capacities cannot be set now. The GSP should also clarify why the minimum thresholds, interim milestones, and measurable objectives for the remainder of the plan area should be set only according to measured historical subsidence rates. An analysis should be done based on the current state of the DMC and the rate and magnitude of future subsidence that could occur before causing undesirable results.	2 – Address with Ongoing Efforts
	46	05/15/2020	USBR – San Joaquin River Restoration Program	SMC 6.3.5.1	The GSP should clarify if the definition of undesirable results [for land subsidence] would include damage or impacts to the SJRRP and Reclamation’s infrastructure. It is partially implied with the term “impacts to natural resources” but is not further specified in the GSP.	3 – Revise GSP See comment #38.
	47	06/09/2020	Friant Water Authority	SMC 6.3.5.1.2	The Plan recognizes subsidence impacts to the DMC and California Aqueduct, and acknowledges that such impacts will continue without mitigation. (Plan at § 5.3.6). And yet the criteria for defining undesirable results to these facilities in Section 6.3.5.1.2 (dentification [sic] of Undesirable Results) are either vague (WSID-PID MA: “...reduces the ability to deliver surface water supplies”) or appear to be overly generous (Remaining Plan area: “50 percent loss of standup capacity...and/or 75 percent overtopping of lining in the Delta-Mendota Canal as a result of inelastic land subsidence”). (Plan at 6-25.) Moreover, with respect to undesirable results affecting the DMC, it is unclear how these two criteria (i.e., the 50% and 75% thresholds for the DMC) were established.	3 – Revise GSP Cite source or give stronger argument as to why these thresholds prevent URs for beneficial users.
	48	06/09/2020	Friant Water Authority	SMC 6.3.5.2	No minimum threshold of subsidence impacts for either of the two management areas noted above is established in Section 6.3.5.2 – they are to be determined at a later date. These thresholds should be promptly established.	3 – Revise GSP Include subsidence MTs for both management areas.
	49	06/09/2020	Friant Water Authority	SMC 6.3.5.2	In its comment letter, the SWP proposes a measurable objective for the Aqueduct of limiting subsidence to a rate of less than 0.01 feet per year by 2040. With respect to the DMC, FWA would encourage a similar measurable objective in terms of increments and timing of subsidence impacts to the DMC as opposed to the percentages of loss of standup capacity and overtopping of the DMC noted above, or an explanation as to how the criteria in the Plan are more protective than the levels proposed by the SWP in terms of avoiding undesirable results to critical infrastructure such as the DMC.	3 – Revise GSP See comment #44.
Water Budget	50	04/06/2020	National Marine Fisheries Service	Basin Setting 5.4.3	The water year index for 2019 was characterized as “above average” for the San Joaquin watershed, whereas 2013 represents the second year of a historic drought. We recommend that the final GSP base their current water budget on a recent water year that represents conditions similar to those experienced in 2019. On a similar note, the historic water budget estimation would improve by utilizing a longer data set than just the 10-year period between 2003 through 2012.	2 – Address with Ongoing Efforts

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	51	05/15/2020	Kristin Dobbin, UC Davis	Basin Setting 5.4.3	The impact of population growth on projected water budgets is also not well accounted for in many cases.	3 – Revise GSP Clarify how population projections were incorporated into the water budget.
	52	05/15/2020	Audubon California	Basin Setting 5.4	Throughout the entire water budget discussion, beginning at Section 5.4 (Final GSP, p. 5-184), managed wetlands and the surface and groundwater resources applied to them are not discussed. As noted previously, the GSA removed substantial acres of “seasonally-managed areas and wetlands...due to their dependence on applied surface water;” (Final GSP, p. 5-176). Yet, these same lands do not appear to be included within the historic or current water budgets, and therefore, not reflected in the projected water budgets. This failure to include or clearly distinguish managed wetlands violates the SGMA regulations.	3 – Revise GSP §354.18 (b)(3) requires documentation of outflows from the groundwater system by water use sector. Per §351 (a), “Water use sector” is the “categories of water demand based on the general land uses to which the water is applied, including urban, industrial, agricultural, <u>managed wetlands</u> , managed recharge, and native vegetation”.
	53	05/15/2020	Audubon California	Basin Setting 5.3.8	The Final GSP did not adequately represent managed wetlands as a beneficial user or demonstrate that this water use sector’s supplies and demands were incorporated into the water budgets. This is a clear data gap but was not acknowledged as such in the Final GSP. Thus, the Final GSP does not adequately identify measures or a schedule to eliminate data gaps associated with managed wetlands.	3 – Revise GSP Include wetlands as a beneficial user in Table 4-1.
	54	05/15/2020	TNC	Basin Setting 5.4	We were disappointed to see that the water budget did not include the current, historical and projected demands of native vegetation and/or managed wetlands, as required under SGMA. This is problematic because key environmental uses of groundwater are not being accounted for as water supply decisions are made using this budget nor will they likely be considered in project and management actions.	3 – Revise GSP See comment #52.
Water Budget	55	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Basin Setting 5.4.3	The GSP does not fully incorporate climate projections into its water budget, specifically aquifer subsurface flows, which is a substantial component of the water budget. The projected water budget in the GSP only includes one climate change scenario, which is inconsistent with the Department’s climate guidance document. The plan does not include water demands for native vegetation or managed wetlands (e.g., evapotranspiration) in the water budget, as required by regulations. The plan also does not clearly identify current and projected demands by domestic well users and small water systems.	3 – Revise GSP Projected water budget with climate change should be refined to include DWR’s four climate change scenarios. See comment #52 regarding water budget.
Sustainability Goal/General SMC	56	04/06/2020	National Marine Fisheries Service	SMC 6.2	NMFS recommends the sustainability goal be restated to more closely align with SGMA regulations and guidance, which define sustainable groundwater management as “the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results.” (DWR 2017). The current goal does not adequately capture the requirement that all six undesirable results, including significant and unreasonable impacts to beneficial uses resulting from streamflow depletion, be avoided.	1 – Already Addressed in GSP or Not Required by SGMA Sustainability goal already reflects avoidance of Undesirable Results.
	57	05/15/2020	Kristin Dobbin, UC Davis	SMC 6	Further, we find that many plans provide limited to no discussion of the ways that drinking water stakeholders were involved in determining local sustainability goals and management criteria.	1 – Already Addressed in GSP or Not Required by SGMA Discussion in introduction to Section 6.

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	58	05/15/2020	California Sportfishing Protection Alliance	Basin Setting 5.4.11	The Plan fails to demonstrate achievement of sustainable groundwater management or the Plan’s sustainability goal. [Sustainable Yield] estimates are invalid because they fail to reflect consideration of undesirable results, especially on fish and wildlife species dependent on interconnected surface water.	1 – Already Addressed in GSP or Not Required by SGMA Not required.
	59	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	SMC 6.3	To protect vulnerable drinking water, we also recommend the GSP identify and evaluate the cumulative and indirect impacts of minimum thresholds on disadvantaged communities.	3 – Revise GSP See comment #3 regarding quantifying effects on beneficial users, for all sustainability indicators.
Outreach and Communication	60	05/14/2020	California Poultry Federation	Sustainability Implementation 7.1.4	The GSAs for the Northern & Central Delta-Mendota Regions have provided minimal information about the process going forward for obtaining effective public participation. See Plan at 7-21. For projects, proponents apparently will comply with notice obligations "as applicable." For management actions, "public noticing and outreach will be conducted." More detailed compliance plans, along with commitments to specific opportunities for public comment, would help assure that the Plan achieves its objectives and complies with the Department's regulations.	1 – Already Addressed in GSP or Not Required by SGMA Section 8.2.1 and Table 8-1 contain planned outreach efforts and budgets for implementation period.
	61	05/15/2020	Kristin Dobbin, UC Davis	Outreach and Communication 4.1	Among our observations thus far is that many GSPs failed to identify the full extent of drinking water users in their area. In particular, community and public water systems not operated by public water or land use agencies were unacknowledged in many plans.	1 – Already Addressed in GSP or Not Required by SGMA Table 4-1 contains domestic well owners and several community water suppliers.
	62	05/15/2020	Kristin Dobbin, UC Davis	Sustainability Implementation 7.1.4	There is discussion of outreach (email, newsletters and website) management as being an ongoing activity. There is also money budgeted for public meetings but no clear discussion or detailed plan for continuing stakeholder engagement.	1 – Already Addressed in GSP or Not Required by SGMA See comment #60.
	63	05/15/2020	Audubon California	Plan Area 2.1.2.5	While the Final GSP does include a listing of protected areas and environmental organizations in a public outreach table (Final GSP, Table 4-1, p. 4-3/4), managed wetlands are not recognized as beneficial users. The Final GSP includes major land-use divisions with a designation called "Grassland and Rangeland" (Final GSP, p. 2-19). The accompanying description does not include any representation of whether managed wetlands are part of this designation, or that a significant number of managed wetlands are actively irrigated.	3 – Revise GSP See comment #53.
Outreach and	64	05/15/2020	USBR – San Joaquin River Restoration Program	Outreach and Communication 4.1	The SJRRP is not listed as a stakeholder group in Table 4-1. The SJRRP is a stakeholder group because a portion of Reach 5 of the SJRRP area borders the Delta-Mendota North-Central Subbasin along the SJR between the Stanislaus-Merced County line and the confluence with the Merced River. In addition, Restoration Flows and fish pass through the entire length of the SJR though the Subbasin on the way to (and from) the Delta. Thus, management of groundwater interactions with ISW and GDEs in the Subbasin will impact the success of the SJRRP in meeting its goals.	3 – Revise GSP List SJRRP as a stakeholder group in Table 4-1.

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	65	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	SMC 6.3	<p>We recommend the GSA continue efforts to identify and engage beneficial users representing disadvantaged communities and the environment and to incorporate the interests of these users into the calculation and update of sustainable management criteria. We provide two specific examples:</p> <ol style="list-style-type: none"> 1. By the time of the 5-year update, the plan must demonstrate whether “groundwater extractions result in significant depletions of interconnected surface waters” (CWC § 10735.2.(a)(5)(B)(ii)). To define significant depletions, beneficial users of surface water should be identified and considered in development of and reporting on sustainable management criteria. 2. In order to ensure best available information about impacts to beneficial users reliant on shallow groundwater, we recommend the GSA improve local information about the location and condition of both active and abandoned groundwater wells. The Department’s well drilling report database has provided an initial and important data source for development of GSPs, but local investigations would improve accuracy regarding well location, condition and water quality. We are also concerned that because well abandonment data is largely unavailable, there is potential for migration of surface contaminants to groundwater from improperly closed wells. We recommend the GSA coordinate with other local agencies to identify inactive and abandoned wells to ensure that they have been properly retired. 	2 – Address with Ongoing Efforts
	66	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Outreach and Communication 4.3.1	We note that, while the GSA included our comments on the draft Plan in the final Plan, it did not provide a public response to any of the comment letters submitted and published as Appendix C, nor did it appear to modify Plan contents based on our comments. We recommend that the GSP be required to respond to public comments within 180 days. Looking ahead, we recommend that the annual reports provide specifics about implementation of the Stakeholder and Community Engagement Plan (SCEP), particularly how the public is kept informed of plan implementation.	2 – Address with Ongoing Efforts
Projects and Management Actions	67	05/15/2020	Central Valley Flood Protection Board	Sustainability Implementation 7.1.5	Some or all of the proposed projects identified in the GSP are within the Board’s jurisdiction, thereby requiring Board approval. However, it is not clear if the infrastructure to divert water from these rivers is proposed or if the project proponent has existing Board encroachment permits. The Sites Reservoir Project notes that a 14-mile-long pipeline from the Sacramento River will be constructed to divert water to offstream storage. It is unclear if the infrastructure to divert water is existing and/or authorized. The Sites Reservoir Project notes that a 14-mile-long pipeline from the Sacramento River will be constructed to divert water to offstream storage. It is unclear if the infrastructure to divert water is existing and/or authorized.	3 – Revise GSP Add clarifying information regarding expected permitting requirements for projects [§ 354.44 (1) (b)].
	68	05/15/2020	California Sportfishing Protection Alliance	Sustainability Implementation 7.1	<p>The Plan fails to demonstrate achievement of sustainable groundwater management or the Plan’s sustainability goal because it relies on projects of unknown feasibility to reduce groundwater pumping.</p> <p>The Plan relies on the implementation of numerous “projects and management actions” to achieve the Plan’s sustainability goal, but concedes that these projects and management actions “require further analysis and permitting to determine feasibility and cost effectiveness. The Plan’s failure to demonstrate the feasibility of these projects and management actions means the Plan fails to demonstrate achievement of sustainable groundwater management or the Plan’s sustainability goal.</p>	2 – Address with Ongoing Efforts
	69	05/15/2020	USBR – San Joaquin River Restoration Program	Sustainability Implementation 7.1.1.2.1	The possible management action of implementing groundwater pumping rules is stated in relation to minimum thresholds of groundwater elevations. However, in Chapter 6 the minimum thresholds are all given in terms of subsidence rates or magnitudes (tied to ground surface elevation measurements).	1 – Already Addressed in GSP or Not Required by SGMA Pumping rules are in respect to groundwater level MTs (which are well depths), not subsidence MTs.

Proposed Response:

Category 1 – Addressed in GSP or Not Required by SGMA. Prepare response to comments letter and note how topic is addressed in GSP, or that it is not required.

Category 2 – Address with Ongoing Effort. Potential commitment for acquisition of additional data and more complete response to comments in the 5-Year GSP Update. Prepare response to comments letter and describe in-progress efforts and actions to address comment and concern (including ISW well installation, subsidence study, data collection, USGS/USBOR groundwater modeling, further development of projects to meet SGMA objectives, requests for grant funding, etc.).

Category 3 – Revise GSP. Revise GSP, as appropriate using available data, and resubmit to DWR within 180-day statutory deadline.

Category 4 – Identify Plan to Address as Part of GSP Update. Comment cannot be addressed by ongoing efforts or within the 180-day deadline. A plan to address the comment will be identified in the 2025 GSP update.

Abbreviations:

GDE = groundwater dependent ecosystem
 GSP = Groundwater Sustainability Plan for the Northern & Central Delta-Mendota Subbasins dated November 2019.
 ISW = interconnected surface water
 SMC = sustainable management criteria

Footnotes:

(a) Comments transcribed from public comment letters downloaded from DWR SGMA portal on 17 November 2021. Comments from DWR on the submitted GSP are not yet available.

Table 1: Categorized Public Comments Received on Groundwater Sustainability Plan for the Northern and Central Delta-Mendota Regions

Topic	Comment ID (#)	Date Received	Commenter / Organization	GSP Chapter / Section Title	Provided Comment (a)	Proposed Response Category
Projects and Management Actions	70	05/15/2020	American Rivers	Sustainability Implementation 7.1	AR is also concerned that there is a heavy reliance on new water supplies that are unlikely to be feasible. Furthermore, it is not clear if there has been much if any coordination yet between GSAs to see if their proposals of water transfers from other districts pencil out. In other words, neighboring GSPs may be depending on each other to make up a significant portion of their water budget shortfall via water transfers, unbeknownst to each other.	2 – Address with Ongoing Efforts
	71	05/15/2020	American Rivers	Sustainability Implementation 7.1	Some projects did not list volumes nor water source. We recommend that the GSP provide more information on the projects to allow better determination of cumulative impacts to surface water bodies.	3 – Revise GSP Clarify water sources and volumes, where applicable.
	72	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Sustainability Implementation 7.1	We reviewed the projects identified in the GSP, including the estimated yield and funding source for each project. We found that this plan, if implemented as noted, would address 23% of the identified overdraft of the basin by year 5. We are concerned that continued overdraft will disproportionately impact beneficial users of water that are already suffering – namely environmental users and disadvantaged communities. We urge more aggressive actions to avoid serious impacts to these users, including considering demand reduction measures, and developing a plan to address disadvantaged residents whose water supply could be impacted by falling water levels through actions such as a domestic well mitigation program.	2 – Address with Ongoing Efforts
	73	06/09/2020	Friant Water Authority	Sustainability Implementation 7.1.1.6	The Plan relegates the potential imposition of a groundwater extraction fee as part of “Tier 3 Management Actions,” which “would be implemented as needed sometime after 2026.” (Plan at § 7.1.1.6 and § 7.1.1.6.1.) The Plan should expedite the adoption of a groundwater extraction fee if the revised thresholds of undesirable results to the DMC and Aqueduct are exceeded or will likely be exceeded before an established period. We believe it is fair and appropriate for those most responsible for the subsidence damage to the DMC and to the Aqueduct to provide funding to help pay for the cost to correct the capacity of these conveyance facilities resulting from the transitional groundwater pumping permitted under the Plan.	2 – Address with Ongoing Efforts
Plan Area	74	05/15/2020	Kristin Dobbin, UC Davis	Plan Area 2.1.2.3	There is no information about depth of domestic wells or Public Supply Wells. Figure 2-10 displays the density and spatial distribution of domestic wells in the GSP region. No information about depths or total number is presented in the text.	3 – Revise GSP Perform or describe a well impact analysis to provide information on domestic wells.
	75	05/15/2020	Kristin Dobbin, UC Davis	Topic not a component of the GSP	No discussion found [on overview of drinking water impacts experienced during the 2012-2016 drought] despite there being a recent drought section under current conditions on page 5-92.	3 – Revise GSP Consider discussing drought impacts to domestic well users.
Misc.	76	05/15/2020	Kristin Dobbin, UC Davis	Topic not a component of the GSP	No mention [of the human right to water (AB 685)].	3 – Revise GSP Consider directly addressing the human right to water.
	77	05/15/2020	Kristin Dobbin, UC Davis	Topic not a component of the GSP	No discussion of drinking water affordability in the plan and/or accommodations for affordability (e.g., exemptions/reductions/rebates for fees or penalties for low-income users).	1 – Already Addressed in GSP or Not Required by SGMA Not required.
	78	05/15/2020	California Sportfishing Protection Alliance	Topic not a component of the GSP	Individual GSPs in this subbasin must coordinate to assess interconnected groundwater conditions that effect listed species impacts across the entire subbasin. Each Plan cannot myopically focus on its own boundaries.	2 – Address with Ongoing Efforts
	79	05/15/2020	USBR – San Joaquin River Restoration Program	Basin Setting 5.3.7.6	Table 5-10 beginning on GSP page 5-179 fails to include Chinook salmon or sturgeon as potential freshwater species. Fremont Cottonwood is also not listed as a potential freshwater-dependent species.	1 – Already Addressed in GSP or Not Required by SGMA Cited dataset does not contain these species.

Proposed Response:

Category 1 – Addressed in GSP or Not Required by SGMA. Prepare response to comments letter and note how topic is addressed in GSP, or that it is not required.

Category 2 – Address with Ongoing Effort. Potential commitment for acquisition of additional data and more complete response to comments in the 5-Year GSP Update. Prepare response to comments letter and describe in-progress efforts and actions to address comment and concern (including ISW well installation, subsidence study, data collection, USGS/USBOR groundwater modeling, further development of projects to meet SGMA objectives, requests for grant funding, etc.).

Category 3 – Revise GSP. Revise GSP, as appropriate using available data, and resubmit to DWR within 180-day statutory deadline.

Category 4 – Identify Plan to Address as Part of GSP Update. Comment cannot be addressed by ongoing efforts or within the 180-day deadline. A plan to address the comment will be identified in the 2025 GSP update.

Abbreviations:

GDE = groundwater dependent ecosystem
 GSP = Groundwater Sustainability Plan for the Northern & Central Delta-Mendota Subbasins dated November 2019.
 ISW = interconnected surface water
 SMC = sustainable management criteria

Footnotes:

(a) Comments transcribed from public comment letters downloaded from DWR SGMA portal on 17 November 2021.
 Comments from DWR on the submitted GSP are not yet available.

Notes on Comments received on Revised GSPs

Comments Submitted Prior to the Deadline:

CSPA

- Revised GSP fails to identify, quantify and mitigate ongoing overdraft.
- Revised Sustainable Yield calculation allows more extraction than has historically occurred.
- Revised SMCs are deficient.
- Improperly identifies ISW as a data gap
- Fails to properly identify and characterize ISWs and GDEs.
- Improperly uses WY 2013 as “current conditions.”
- Fails to Comply with the Public Trust Doctrine and the Waste and Unreasonable Use Doctrine.

Friant Water Authority

- Develop a calibrated numerical groundwater flow model to determine the most accurate sustainable yield for the subbasin.
- Develop additional projects and management actions to reduce change in storage declines.
- Conduct an analysis to estimate subsidence to better inform SMCs
- Increase Lower Aquifer Monitoring stations in the southern part of the subbasin to better understand subsidence.
- Increase subsidence monitoring, especially near the DMC.
- Include projects and management actions specific to subsidence along the DMC.

NMFS

- SMCs are inappropriate for avoiding significant adverse impacts to ESA listed salmonids, green sturgeon, and their habitats.
- GSP doesn't describe and consider impacts to GDEs.
- GSPs fail to include an adequate analysis and consideration of public trust resources.
- Their original comment letter remains valid.

SJRRP/USBR

- GSAs have not engaged with SJRRP SGMA review team.
- GSPs must define how impacts to GDEs will be determined and what actions will be taken to mitigate those impacts.
- SMCs for ISW were set at a time (2015) when restoration flows were not present in the Subbasin.
- SMCs for subsidence will affect fish passage structures and other critical infrastructure in the subbasin.
- Their original comment letter remains valid.

Comments Submitted After the Deadline

California Aqueduct Subsidence Program (CASP)

- SMCs for subsidence are less protective and lack definition for the Aqueduct.

- Undesirable results for subsidence are inappropriate to the aqueduct.
- Sustainability indicators are general to critical infrastructure in the Subbasin but not specific to the aqueduct.
- MTs for subsidence are not appropriate indicators for subsidence along the aqueduct.
- There are ambiguous corrective actions when MTs are exceeded.
- Significant lack of monitoring sites along the aqueduct in the Subbasin.
- SWP denies it ever agreed to or approved the specific MT in the revised GSP.

Funding Opportunities – Updated 11/8/2022

Riparian Restoration Grants

The program provides funds to restore or enhance working lands and riparian corridors through restoration projects on agricultural lands. Activities funded under this program must target agricultural lands and may include: Planning grants and implementation grants. Funding is through the CA Dept. of Conservation and 25% funding match required. Deadline 11/18/22

Pollinator Habitat Program

Support pollinators by providing floral resources, host plants, and other suitable elements integrated with farming operations to benefit biodiversity and agricultural production. Maximum \$2 million/project. CA Dept. of Food and Agriculture. Deadline 11/23/22

California Farmland Conservancy Program

The program supports local efforts to preserve important agricultural land resources and enhance sustainable agricultural uses. \$4.9 Million available. Either a 5 or 10% match required, depending. CA Dept. of Conservation. Deadline 11/25/22 with a pre-proposal required.

SGMA Implementation Round 2 Funding

Will be similar to Round 1, except specific set asides per subbasin are not expected. This solicitation will be open to all medium, high, and critically over-drafted subbasins with submitted GSPs. Through the Department of Water Resources. Approximately \$256 million dollars available. Deadline 11/30/22

2023 Alliance Grant Program

This program funds projects that promote or increase the implementation of IPM practices that reduces risks to health or the environment. Department of Pesticide Regulation. \$1.5 million available. Deadline 12/8/22

Fertilizer Research and Education Program (FREP)

Pre-proposals are being accepted. FREP funds and facilitates research and education to advance the environmentally safe and agronomically sound use and handling of fertilizing materials. Dept. of Food and Ag. Up to \$225,000. Deadline 12/19/22.

CVPIA Habitat Restoration Program

Funding for projects that protect and restore native habitat impacted by the Central Valley Project. Up to \$4.7 million available from the USBR and USFWS. Grants from \$25,000 to \$1,000,000. Deadline 12/30/22.

Food Production Investment Program

Funding to accelerate the adoption of advanced energy efficiency and renewable energy technologies at California food processing plants and benefit priority populations. \$7 million available from the CA Energy Commission. 35% match required. Deadline 1/25/23

Urban Community Drought Relief Program

Includes set-aside funding for DACs, SDACs, and Underrepresented communities. A wide variety of eligible activities. Minimum \$3 Million Award. Grants through DWR. Deadline 1/31/23.

County-Wide and Regional Funding Program

Funding for regional programs that address drought-related and contamination issues for small water systems and domestic wells serving DACs. No deadline. Funding is from the State Water Board.

Riparian Habitat Conservation Program

The Wildlife Conservation Board is accepting concept proposals for projects that provide meaningful and sustainable improvements to riparian habitats. \$3 Million available on a rolling basis.

Fertilizer Research and Education Program

Total of \$225,000 available for projects on: improving input management, understanding plant-soil processes, and evaluating loss pathways. They are focused on nutrients in general with nitrogen/nitrates as a particular focus. It is a rolling deadline with funding awarded as projects are approved. CA Dept. of Food and Agriculture

GSP Implementation Schedule Northern & Central Delta-Mendota GSP Region

3-MONTH LOOK-AHEAD SCHEDULE

TASK	RESPONSIBLE PARTY	START	END	NOV				DEC				JAN				FEB			
				WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3
BASIN-SCALE COORDINATION																			
Annual Report																			
WY2022 DM Consolidated Annual Report	W&C / Basin GSAs	10/10/22	4/1/23																
Intra-Basin Coordination																			
Subbasin Coordination Committee	Basin GSAs		Bi-Monthly																
DM Technical Working Group	Basin GSAs		As-needed																
DMS Working Group	Basin GSAs		As-needed																
SGM Implementation Grants																			
Perform SGM Round 1 Grant Approved Activities	Basin GSAs	10/7/22	4/30/25																
Prepare SGM Round 2 Grant Application	Basin GSAs / W&C	10/4/22	12/16/22																
N-C REGION COORDINATION / ADMINISTRATION																			
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		Complete																
Data QA/QC	GSAs / W&C	10/31/22	11/30/22																
Fall Data Consolidation/Upload to DMS/SGMA Portal	GSAs / W&C	10/31/22	12/31/22																
Install New Monitoring Wells	GSAs	7/1/20	12/31/22																
Interconnected Surface Water Monitoring																			
Install/Identify New Monitoring Wells	WSID / PID / NWDM	3/1/20	12/31/22																
Meet with Adjoining GSP Groups	WSID / PID / NWDM		As-needed																
Subsidence Monitoring																			
Collect Subsidence Data	USBR / GSAs	6/1/22	12/31/22																
Data QA/QC	GSAs / W&C	6/1/22	1/31/23																
Data Consolidation/Upload to DMS	GSAs / W&C	6/1/22	1/31/23																
Projects^(a)																			
Los Banos Creek Recharge and Recovery Project	SLWD		In design																
Kaljjan Drainwater Reuse Project	SLWD		PD in 2022																
Orestimba Creek Recharge and Recovery Project	DPWD		In design																
NVRRWP – Increased Modesto and Turlock Portions ^(b)	DPWD		Complete																
Percolation Ponds for Stormwater Capture and Recharge	City of Patterson		PD in 2022																
WSID Lateral 4-North Recapture and Recirculation Reservoir ^(c)	WSID		Design in 2023																
Revision to TRID Lower Aquifer Pumping ^(d)	TRID		On-going																

GSP Implementation Schedule Northern & Central Delta-Mendota GSP Region

3-MONTH LOOK-AHEAD SCHEDULE

TASK	RESPONSIBLE PARTY	START	END	NOV				DEC				JAN				FEB			
				WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3
Management Actions^(a)																			
Lower Aquifer Pumping Rules for Minimizing Subsidence	GSA's	6/25/20	12/31/23																
Maximize Use of Other Water Supplies	GSA's	6/25/20	10/31/24																
Increasing GSA Access to and Input on Well Permits	GSA's	6/11/20	3/31/23																
Drought Contingency Planning in Urban Areas	GSA's	Complete																	
Fill Data Gaps	GSA's	2/1/20	4/30/25																
Additional GSP Activities																			
USGS / Basin Model	USGS/USBR	3/1/20	12/31/22																
Develop 2025 GSP Update	GSA's / TBD	1/1/23	10/31/24																
Project Management and Communication	SLDMWA / EKI	3/1/22	2/28/23																
As-Needed Technical Support	EKI / W&C	3/1/22	2/28/23																

Abbreviations

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

Notes

- (a) Prop 68 Grant Coordination activities extend through 6/30/2022; 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.

Key Dates

- November 14, 2022: Northern & Central Delta-Mendota Management Committees Meeting
- December 12, 2022: Subbasin Coordination Committee Meeting
- December 12, 2022: Subbasin TWG Meeting with USGS/USBR on Groundwater Model
- December 14, 2022: Northern & Central Delta-Mendota Management Committees Meeting
- December 16, 2022: Subbasin SGMA Round 2 GSP Implementation Grant Application Due to DWR
- January 26, 2023: Northern & Central Delta-Mendota Management Committees Meeting
- February 13, 2023: Subbasin Coordination Committee Meeting
- February 23, 2023: Northern & Central Delta-Mendota Management Committees Meeting

Table 1: Northern & Central Delta-Mendota GSP Implementation Commitments - in Text of Groundwater Sustainability Plan

Task	Activity	Related	GSP Deadline	GSP Reference ^(a)	Status as Reported in WY2021 Annual Report	Comments	Activities Performed to Date in WY 2022 ^(d)
1	Update/refine monitoring network as new wells are constructed and well construction information is obtained						
1a	Well Census and Inventory project	--	2025	--	Completed in February 2022	Reconciliation of Well Census and Inventory information with update to SGMA monitoring network remains to be done.	Additional changes to NCDM representative monitoring network (RMN) will be necessary as additional wells were removed from the RMN during 2022 sampling events.
1b	Video log 14 wells that are missing well construction information	--	2025	NCDM GSP Section 7.2.5.1.6	N/A	Identified as an optional task in Well Census and Inventory project scope but not performed.	--
1c	Determine if video-logged wells are appropriate to add to the [SGMA] monitoring network	1a	2025	CC Section 4.2.8; NCDM GSP Sections 5.3.8 and 7.2.5.1.6	N/A	--	--
2	Establish ICSW SMC as a rate or volume of surface water depletions						
2a	Install five additional ICSW monitoring wells adjacent to the San Joaquin River	--	2025	CC Section 4.2.8; NCDM GSP Section 5.3.8	N/A	\$929,400 awarded to Subbasin in SGM Round 1 Implementation Grant for data gap filling efforts, including installation of at least one (1) and up to four (4) ICSW monitoring wells in the NCDM region.	SGM Round 1 Funding Agreement executed with DWR on 10/7/22. Funding for additional ISW wells will be included in SGM Round 2 Grant Application due 11/30/22.
2b	Collect and analyze data from ICSW monitoring wells	2a	2030	CC Section 4.2.8; NCDM GSP Section 5.3.8	N/A	Limited data collection and analysis to date.	--
3	GDE mapping						
3a	Analyze locations of potential GDEs using recent groundwater elevation/depth contour mapping	--	2025	CC Section 4.2.8; NCDM GSP Section 5.3.8	N/A	Limited/no data collection and analysis to date.	--
4	Re-evaluate land subsidence SMC considering new data and studies						
4a	Collect and analyze subsidence data from 2020-2025 and identify where there are spatial data gaps	--	2025	CC Section 4.2.8	Ongoing, data collected WY2020 and 2021	Completed <i>Conceptual Master Plan for Subsidence Monitoring and Management for the Delta-Mendota Subbasin</i> in June 2022.	--
4b	Work with USBR to revise CVHM2 model to simulate interactions between groundwater extractions and land subsidence	--	2025	CC Section 5.4.4	N/A	Intermittent coordination meetings have occurred between SLDMWA, GSAs, and USBR.	Meeting with USBR re groundwater model on 12/12/2022.
4c	Determine portion of subsidence caused by groundwater extraction within and outside the Subbasin at each RMS	4a, 4b	2025	NCDM GSP Section 6.3.5.3	N/A	\$929,400 awarded to Subbasin in SGM Round 1 Implementation Grant for portion of data gap filling efforts, including subsidence monitoring.	SGM Round 1 Funding Agreement executed with DWR on 10/7/22.
4d	Review and revise HCM to incorporate new subsidence data, including AEM survey and results from the subsidence study	4a, 4c	2025	CC Section 5.4.4; NCDM GSP Section 6.3.5.3	N/A	Limited/no analysis to date.	--
4e	Assess allowable land subsidence on a Subbasin and localized basis	4a, 4c, 4d	2025	CC Section 5.4.4; NCDM GSP Section 6.3.5.3	N/A	Limited/no analysis to date.	Several NCDM GSAs planning local subsidence monitoring events at end of 2022.
4f	Conduct an updated subsidence DMC Conveyance Capacity Analysis	--	2025	NCDM GSP Section 5.3.8	N/A	SLDMWA led effort. SLDMWA noted that work has been done to create a model in HEC-RAS and an EIR for Subsidence Correction Project is expected to be complete mid-2023.	--
5	Refine/update water budget and sustainable yield estimates						
5a	Establish additional CIMIS and/or other weather stations to define spatial variability of precipitation and evapotranspiration	--	2025	NCDM GSP Section 5.3.8	N/A	Limited/no analysis to date.	--
5b	Reconciliation of water budget nomenclature in individual GSPs with terminology used in the Common Chapter	--	2025	CC Section 4.3.1	N/A	Limited/no analysis to date.	--
5c	Improve estimated allocation of groundwater extraction between two aquifers (based on well construction information and inventory projects completed by GSAs in 2022)	1a, 1b	2025	CC Section 4.3.1	N/A	Limited/no analysis to date. Reconciliation of Well Census and Inventory information with update to pumping estimates remains to be done. Some GSAs have initiated efforts to register wells and require metering/water use reporting, but incomplete records to date.	--
5d	Improve storage estimates of each aquifer using data collected from 2020-2025	--	2025	CC Section 4.3.1	N/A	Limited/no analysis to date.	--

Task	Activity	Related	GSP Deadline	GSP Reference ^(a)	Status as Reported in WY2021 Annual Report	Comments	Activities Performed to Date in WY 2022 ^(d)
6	Update Sustainable Management Criteria						--
6a	Develop short-term (acute) thresholds for Chronic Lowering of Groundwater Levels	--	2025	CC Section 5.4.1; NCDM GSP Section 6.3.1.2	N/A	Limited/no analysis to date.	--

Abbreviations:

AEM	= Airborne Electromagnetic	N/A	= Not Applicable
CC	= Common Chapter	NCDM	= Northern & Central Delta-Mendota
CIMIS	= California Irrigation Management Information System	PID	= Patterson Irrigation District
CVHM2	= Central Valley Hydrologic Model, Version 2	RMS	= Representative Monitoring Site
DMC	= Delta-Mendota Canal	SGM	= Sustainable Groundwater Management
EIR	= Environmental Impact Report	SGMA	= Sustainable Groundwater Management Act
GDE	= Groundwater Dependent Ecosystem	SLDMWA	= San Luis and Delta-Mendota Water Authority
GSA	= Groundwater Sustainability Agency	SMC	= Sustainable Management Criteria
GSP	= Groundwater Sustainability Plan	USBR	= United States Bureau of Reclamation
HCM	= Hydraulic Conceptual Model	WSID	= West Stanislaus Irrigation District
ICSW	= Interconnected Surface Water	WY	= Water Year

Notes:

- (a) Commitments identified in this table were made in either the 2022 Amended NCDM GSP or Common Chapter for the Delta-Mendota Subbasin GSPs.
- (b) Based upon information reported by GSAs.
- (c) A yellow highlighted row indicates that the activity was not included in the 2020 GSP submittal and was added during the 2022 GSP revision process.
- (d) Based upon information communicated by GSAs.

Table 2: Northern & Central Delta-Mendota GSP Implementation Commitments - Projects

Tier ^(a)	Project ^(b)	Project Proponent	Estimated Cost	Status as Reported in WY2021 Annual Report ^(c)	Comments ^(d)	Activities Performed to Date in WY 2022 ^(e)
1	Los Banos Creek Recharge and Recovery Project	San Luis Water District	\$9,116,374	Preliminary design completed in 2018; additional steps pending funding for CEQA, design, and construction.	\$1,000,000 awarded in SGM Round 1 Implementation Grant.	SGM Round 1 Funding Agreement executed with DWR on 10/7/22.
1	Orestimba Creek Recharge and Recovery Project	Del Puerto Water District	\$7,923,450	CEQA/NEPA complete; design anticipated complete in early Spring 2022; Construction anticipated complete by end of 2023.	--	Design complete in October 2022.
1	North Valley Regional Recycled Water Program (NVRWP) – Modesto and Early Turlock Years	Del Puerto Water District	\$96,000,000	Completed Turlock and Modesto components in March 2020; Ceres component in progress, funding requested through SGM Round 1 Implementation Grant; anticipated completion in 2023.	Portions of project are completed. \$250,150 awarded in SGM Round 1 Implementation Grant.	SGM Round 1 Funding Agreement executed with DWR on 10/7/22.
1	City of Patterson Percolation Ponds for Stormwater Capture and Recharge	City of Patterson	\$7,800,000	Project still in conceptual and EIR phase (linked to planned development); preliminary design to occur in 2022.	--	--
1	Kaljjan Drainwater Reuse Project	San Luis Water District	\$16,500,000	Preliminary design and CEQA/permitting in progress; design planned for 2023-2025, construction planned to start in 2025.	--	--
1	West Stanislaus Irrigation District Lateral 4-North Recapture and Recirculation Reservoir	West Stanislaus Irrigation District	\$1,120,000	FS completed in Sept 2021; design anticipated to take 8 months with CEQA in parallel.	\$250,150 awarded in SGM Round 1 Implementation Grant.	SGM Round 1 Funding Agreement executed with DWR on 10/7/22. Construction planned to start in late 2024.
1	Revision to Tranquillity Irrigation District Lower Aquifer Pumping	Tranquillity Irrigation District	\$0	Well Water Operations Plan established in 2017 and implemented on an annual basis.	--	--
2	Del Puerto Canyon Reservoir Project	Del Puerto Water District	\$491,300,000	30% preliminary design anticipated to be complete in 2022; CEQA completed in October 2020; NEPA to be completed fall 2024; 100% design and permitting anticipated complete in 2024; construction anticipated complete in 2028.	--	--
2	Little Salado Creek Groundwater Recharge and Flood Control Basin	Stanislaus County	\$7,710,000	Scheduled for development in subsequent phases of the overall CLIBP project.	--	--
2	Patterson Irrigation District Groundwater Bank and/or Flood MAR-type Project	Patterson Irrigation District	TBD	Consultant retained for FS; acquired small potential property.	--	--
2	West Stanislaus Irrigation District Lateral 4-South Recapture and Recirculation Reservoir	West Stanislaus Irrigation District	\$1,500,000	Preliminary design complete in September 2021.	Partially funded under IRWM grant.	--
2	Ortogonal Creek Groundwater Recharge and Recovery Project	San Luis Water District	TBD	N/A	Partially funded under IRWM grant.	Funding request will be included in SGM Round 2 Grant Application due 11/30/22.

Abbreviations and Notes provided on page 2

Abbreviations:

CEQA	= California Environmental Quality Act
CLIBP	= Crows Landing Industrial Business Park
EIR	= Environmental Impact Report
FS	= Feasibility Study
IRWM	= Integrated Regional Water Management
MAR	= Managed Aquifer Recharge
N/A	= Not Applicable
NCDM	= Northern & Central Delta-Mendota
NEPA	= National Environmental Policy Act
SGM	= Sustainable Groundwater Management
TBD	= To Be Determined
USBR	= United States Bureau of Reclamation
WY	= Water Year

Notes:

- (a) Projects and Management Actions divided into Tiers (pg 7-1 of Revised GSP):

Tier 1 – Near-term projects and management actions that the Groundwater Sustainability Agencies (GSAs) are committed to implementing at this time. These projects and management actions are either currently in the process of being implemented or could be implemented in the near future (constructed and operational) within the next five years (by 2025).

Tier 2 – Projects and management actions that have been identified and require further development before implementation can occur. It is anticipated that these projects and management actions could be developed over the next five years and implemented beginning in 2026 or later, pending re-evaluation prior to the 5-year GSP Update in 2025.

Tier 3 – Longer-term projects and management actions that may be implemented in the future as needed. Many of these projects are outside of the GSAs' control but could have implications on surface water availability and/or are additional projects/management actions that could be implemented under an adaptive management approach. For purposes of this analysis, did not include the Tier 3 projects listed in the GSP (because implementation of the identified projects is driven by others).

- (b) Project information obtained from Section 7 of the 2022 amended NCDM GSP.
 (c) Consolidated WY 2021 Annual Report dated March 2022, incorporating updated information obtained from GSAs in 3Q2022 GSP Implementation Tracking Tools.
 (d) Per SGMA Budget Spending Plan circulated by John Brodie on 12 August 2022, NCDM was awarded a total of \$1,500,300 from SGMA Round 1 grant to Subbasin.
 (e) Based upon information communicated by GSAs.

Table 3: Northern & Central Delta-Mendota GSP Implementation Commitments - Management Actions

Tier ^(a)	Management Action ^(b)	Status as Reported in WY2021 Annual Report ^(c)	Comments	Activities Performed to Date in WY 2022 ^(d)
1	Lower Aquifer Pumping Rules for Minimizing Subsidence	GSA's have coordinated on developing Lower Aquifer pumping rules	Limited/no analysis or discussion to date. Some GSAs (e.g., CDM, PID and WSID) have adopted ordinances requiring the registration of wells and/or reporting of pumping. Wells in other GSAs are equipped with meters. This pumping data, coupled with the <i>Well Census and Inventory</i> Report, could be used to at least better understand the location and distribution of pumping.	GSA efforts to require metering and reporting of pumping are continuing. CDM GSA has developed a draft Administrative Policy for metering/reporting.
1	Maximize Use of Other Water Supplies	N/A	No formal policies implemented.	SNCWD expects to sign contract for surface water supply by 12/31/22.
1	Increasing GSA Access to and Input on Well Permits	GSAs have coordinated on increasing GSA participation in well permitting process	Governor's EO N-7-22 provides some clarity and authority. Merced County and Stanislaus County have updated their well permitting process and requirements.	GSA effort continues on this topic.
1	Drought Contingency Planning in Urban Areas	Conducted as part of UWMPs	Addressed in adopted 2020 UWMPs (applies to City of Patterson).	--
1	Fill Data Gaps	N/A	See "Implementation Activities" tab for specific data-gap filling efforts. SGM Round 1 Implementation Grant awarded \$929,400 to Subbasin for Data Gaps and Monitoring.	SGM Round 1 Funding Agreement executed with DWR on 10/7/22. Additional ISW wells being requested as part of SGM Round 2 Funding Agreement due 11/30/22.
2	Develop Program to Incentivize Use of Surface Water and Reduce Groundwater Demand	N/A	Limited/no analysis or discussion to date.	--
3	Groundwater Extraction Fee with Land Use Modifications	N/A	Limited/no analysis or discussion to date.	--
3	City of Patterson Reduced Groundwater Use Portfolio	N/A	Limited/no analysis or discussion to date.	--
3	Rotational Fallowing of Crop Lands	N/A	Limited/no analysis or discussion to date.	--

Abbreviations:

- CDM = Central Delta-Mendota
- EO = Executive Order
- GSA = Groundwater Sustainability Agency
- GSP = Groundwater Sustainability Plan
- NCDM = Northern & Central Delta-Mendota
- N/A = Not applicable
- PID = Patterson Irrigation District
- SGM = Sustainable Groundwater Management
- UWMP = Urban Water Management Plan
- WSID = West Stanislaus Irrigation District
- WY = Water Year

Notes Provided on Page 2

Notes:

- (a) Projects and Management Actions divided into Tiers (pg 7-1 of 2022 Amended NCDM GSP):
 - Tier 1 – Near-term projects and management actions that the Groundwater Sustainability Agencies (GSAs) are committed to implementing at this time. These projects and management actions are either currently in the process of being implemented or could be implemented in the near future (constructed and operational) within the next five years (by 2025).
 - Tier 2 – Projects and management actions that have been identified and require further development before implementation can occur. It is anticipated that these projects and management actions could be developed over the next five years and implemented beginning in 2026 or later, pending re-evaluation prior to the 5-year GSP Update in 2025.
 - Tier 3 – Longer-term projects and management actions that may be implemented in the future as needed. Many of these projects are outside of the GSAs’ control but could have implications on surface water availability and/or are additional projects/management actions that could be implemented under an adaptive management approach.
- (b) Management Action information obtained from Section 7 of the 2022 Amended NCDM GSP.
- (c) Consolidated WY 2021 Annual Report dated March 2022, incorporating information provided by GSAs in 3Q2022 GSP Implementation Tracking Tools.
- (d) Based upon information communicated by GSAs.

Table 4: Northern & Central Delta Mendota GSP Implementation - Status of Well Ordinances

Organization	Ordinance Identification	Ordinance Date	Text (3Q2022 Update in Red Font)
Fresno County	Ordinance No. 00-13	September 2000	Section 14.03.090 - Conditions of permit approval. "C. If requested by the county, the permittee shall share with the county groundwater monitoring information and data, and, where practicable, the parties shall coordinate their groundwater management efforts to effectively monitor groundwater resources throughout the county"
Merced County	Ordinance No. 1930 An Ordinance to Prevent the Mining and Export of Groundwater from the Unincorporated Portions of Merced County	March 2015	Section 9.27.065 - Groundwater Monitoring & Reporting "A. Monitoring. All new permits for wells or groundwater exports under the scope of this ordinance shall be measured by a properly installed and maintained water measuring device satisfactory to the Department of Public Health, Division of Environmental Health. As an alternative to water measuring devices, other reasonable methods to determine groundwater extraction may be used if approved by the Department of Public Health, Division of Environmental Health. B. Reporting. All persons, including Public Works Agencies, that extract groundwater within the County shall cause to be prepared and submitted to the Department of Public Health, Division of Environmental Health, annual reports of groundwater information that are necessary to monitor the existing condition of groundwater resources within the County....The required information to be reported shall include without limitation water level and pumping data...."
Stanislaus County	Ordinance CS 1155, Section 9	2014	Section 9.37.065 Groundwater monitoring. "A. All persons, including public water agencies that extract groundwater within the county shall cause to be prepared and submitted to the county department of environmental resources periodic reports of groundwater information that are reasonably necessary to monitor the existing condition of groundwater resources within the county, to determine trends, or to develop effective sustainable groundwater management plans and policies. A de minimis extractor shall not be required to submit such information. B. The department shall develop and recommend regulations to be adopted by the board that establish the frequency and timing of required reports, and the required information to be monitored, including, without limitation, water level and pumping data, or other data necessary for any other method to determine groundwater production."
Patterson Irrigation District	Resolution 05-2020: Patterson Irrigation District Groundwater Sustainability Agency Rule Regarding Irrigation Well Meters	15 April 2020	"The owner of any Groundwater Extraction Facility within the PID GSA must register that Groundwater Extraction Facility with the PID GSA... ...The owner of every Groundwater Extraction Facility within the PID GSA must measure use of that Groundwater Extraction Facility by a water-measuring device (Meter) satisfactory to the PID GSA... ...Meters must be installed on all Groundwater Extraction Facilities by January 1st, 2021."
West Stanislaus Irrigation District	West Stanislaus Irrigation District Groundwater Sustainability Agency Policy Regarding Irrigation Well Meters	2020	"The owner of any Groundwater Extraction Facility within the WSID GSA must register that Groundwater Extraction Facility with the WSID GSA... ...The owner of every Groundwater Extraction Facility within the WSID GSA must measure use of that Groundwater Extraction Facility by a water-measuring device (Meter) satisfactory to the WSID GSA. Meters must be installed on all Groundwater Extraction Facilities by January 1st, 2021. The meter shall measure all flow rate in gallons per minute, or cubic feet per second and totalize total extractions in gallons, cubic feet, or in acre-feet."
Del Puerto Water District	Draft Groundwater Well Metering Policy	15 June 2022	Covers well registration, metering, access, costs, semi-annual reporting, maintenance, and exclusions. Packets to be sent to customers explaining the new well registration and metering policy requirements in the near future.
City of Patterson	Ordinance No. 348, Section 1	1981	13.20.010 Private wells—Construction prohibited. No person, firm or corporation may drill, dig or install a water well in the city for any purpose whatsoever, save and except the Patterson City Water Company.

Organization	Ordinance Identification	Ordinance Date	Text (3Q2022 Update in Red Font)
Central Delta-Mendota GSA	Central GSA Resolution Nos. 2021-01 and 2021-02	25 January 2021	Adopted two Resolutions on 25 January 2021: require registration of all wells by 4/1/2021, impose fee for late registration. Developed draft Well Metering and Reporting Policy in 2022 to require installation of meters on production wells within the GSA and reporting of pumped groundwater volumes.
Widren Water District	N/A	N/A	N/A. The two operational supply wells in WWD are equipped with meters.

Abbreviations:

- GSA = Groundwater Sustainability Agency
- GSP = Groundwater Sustainability Plan
- N/A = Not Applicable
- NCDM = Northern & Central Delta-Mendota
- No. = Number
- PID = Patterson Irrigation District
- SGMA = Sustainable Groundwater Management Act
- WSID = West Stanislaus Irrigation District

Notes:

- (a) Online search for ordinances adopted by NCDM GSAs and member agencies performed in August 2022.
- (b) Note that County Ordinances are also discussed in Section 2.3.2 of the 2022 amended NCDM GSP. Discussion speaks more to permitting process for well construction/destruction and less to measuring of pumped groundwater.