



Meeting of the Delta-Mendota Subbasin Coordination Committee

Monday, October 13, 2025, 1:00 PM

SLDMWA Board Room 842 6th St., Los Banos, CA 93635
The Public May Join the Meeting at the Zoom Link Below:

<https://zoom.us/j/93491446604>

Webinar ID: 934 9144 6604

Call-In: +16694449171,,93491446604# US

NOTICE IS HEREBY GIVEN that a Meeting of the Delta-Mendota Subbasin Coordination Committee has been called for **Monday, October 13, 2025 at 1:00 PM**, on items listed on the attached agenda, which is incorporated by reference and made a part hereof.

Teleconference Locations:

842 6th St., Los Banos, CA 93635	8402 N. Poplar Ave., Fresno, CA 93711	948 Orange Ave., Patterson, CA 95363
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Persons with a disability may request disability-related modification or accommodation by contacting Cheri Worthy or Sandi Ginda at the Water Authority Office, 842 6th Street, P.O. Box 2157 Los Banos, CA 93635, via telephone at (209) 826-9696, or via email at cheri.worthy@sldmwa.org or sandi.ginda@sldmwa.org. Requests should be made as far in advance as possible before the meeting date, preferably 3 days in advance of regular meetings or 1 day in advance of special meetings/workshops.

AGENDA

1. Call to Order/Roll Call ([Hopkins](#))
2. Pledge of Allegiance ([Hopkins](#))
3. Committee to Consider Corrections or Additions to the Agenda of Items, as Authorized by Government Code Section 54950 et seq. ([Hopkins](#))
4. Opportunity for Public Comment ([Hopkins](#))

Consent Calendar

5. Committee to Review and Take Action on the Consent Calendar ([Hopkins](#))
 - a. Minutes of the September 8, 2025 Meeting
 - b. Budget to Actual Report

Closed Session

6. Conference with Legal Counsel – Anticipated Litigation
 The Committee will meet in closed session to confer with legal counsel on significant exposure to anticipated litigation pursuant to paragraph (2) of subdivision (d) of Government Code Section 54956.9: (1 case)

Open Session

7. Report from Closed Session ([Layne](#))

Action Items

8. Direction on Draft Budget Components ([Petersen/Blakslee](#))
9. Direction on Domestic Well Mitigation Policy Outreach ([Blakslee/Beutler](#))

Report Items

10. Update on DWR Subsidence Workshop and Subbasin Comment Letter ([Dutton/Layne](#))
11. Program Management Report ([Blakslee](#))
 - a. Review of Previous Meeting Action Items
 - b. Schedule of Key Milestones
12. Update on Facilitation Support Services Outreach Activities ([Beutler](#)) – *Verbal*
 - a. Update on Status of Meetings with Adjoining Subbasins Regarding Comment Letters on Periodic Evaluations ([Beutler](#))
13. SWRCB Updates
 - a. Update on SWRCB Coordination ([Martin/Hurley/Dutton](#)) – *Verbal*
14. SGMA Round 1 Implementation Grant
 - a. Update on Status of Interconnected Surface Water (ISW) Well Construction Project ([Francis](#))
 - b. Update on Status of Subsidence Monitoring Project ([Blakslee/Martin](#)) – *Verbal*
 - c. Update on Status of All Grant Projects ([Dumas](#))
15. GSP Implementation Updates
 - a. Update on Q3 Groundwater Levels and Groundwater Quality and DMS Upload ([Dumas](#))
 - b. Update on Pumping Reduction Plan and GSP Implementation Tracking and Exceedance Reporting ([Dutton](#))
 - c. Update on Water Year 2025 Annual Report Development ([Blakslee](#))
 - d. Report from GSAs with Exceedances ([Blakslee/GSAs/ Hopkins](#))

16. Next Steps ([Blakslee](#))
17. Reports Pursuant to Government Code Section 54954.2(a)(3) ([Layne](#))
18. Next Meeting(s): ([Hopkins](#))
 - a. Regular Coordination Committee Meeting: November 10, 2025
19. Adjournment ([Hopkins](#))



2025 DELTA-MENDOTA SUBBASIN COORDINATION COMMITTEE MEETING DATES (*2nd Monday*)

November 10, 2025	1:00pm	SLDMWA Board Room 842 6th St., Los Banos, CA 93635
December 8, 2025	1:00pm	Grassland Water District Board Room

LIST OF ACRONYMS

CEQA	California Environmental Quality Act
DMS	Data Management System
DWR	California Department of Water Resources
FSS	Facilitation Support Services
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
ISW	Interconnected Surface Water
JPA	Joint Powers Authority
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
MT	Minimum Threshold
PRP	Pumping Reduction Plan
RMW	Representative Monitoring Wells
SLDMWA	San Luis & Delta-Mendota Water Authority (Authority)
SMC	Sustainable Management Criteria
SWRCB	State Water Resources Control Board



TO: Coordination Committee
Agenda Item No. 5

FROM: Taylor Blakslee, Hallmark Group

DATE: October 13, 2025

SUBJECT: Committee to Review and Take Action on the Consent Calendar

Recommendation

Approve the consent calendar.

Discussion

The documents below are included in the consent calendar for consideration of approval:

- a. Minutes of the September 8, 2025 Coordination Committee Meeting (Attachment 1)
- b. Budget to Actual Report through August 2025 (Attachment 2)

Attachment 1



Delta-Mendota Subbasin Coordination Committee

Monday, September 8, 2025, 1:00 PM
 Grassland Water District Boardroom
 200 W. Willmott Avenue, Los Banos, CA 93635

Draft Meeting Minutes**PARTICIPANTS:****Committee Members**

Joe Hopkins, Aliso WD
 Augustine Ramirez, Alternate, Fresno County A&B
 Jim Stilwell, Farmers WD
 John Wiersma, San Joaquin Exchange Contractors
 Chase Hurley, Central DM Region
 Ric Ortega, Grassland WD (arrived at 1:14 p.m.)
 Vince Lucchesi, Northern DM Region

Others Present

Adam Scheuber, Del Puerto WD
 Caleb Stearm, West Stanislaus Irrigation District
 Jarrett Martin, Alternate, San Joaquin Exchange Contractors
 Kait Palys, INTERA
 Lacey McBride, Merced County
 Larissa C., City of Patterson
 Lauren Layne, Legal Counsel, Baker Manock & Jensen
 Maria Encinas, City of Patterson
 Matt Garcia, Del Puerto WD
 Patrick McGowan, Panoche WD
 Scott Petersen, San Luis Delta-Mendota Water Authority
 Steve Stadler, San Luis Water District

Present Via Zoom/Phone

Alma Antuna, Westlands Water District
 Amir Mani, EKI
 Andrew Francis, LSCE
 Anona Dutton, EKI
 Antonio Solorio, Westlands Water District
 Christy McKinnon, Alternate, Northern DM Region

Ethan Andrews, Provost & Prichard
 Gary Ingram, City of Gustine
 Gilbert Torres, Fresno County
 Jacinta Cabral, Madera County
 Jason Dean
 Juan Cadena, Mercy Springs WD
 Liam's iPhone
 Lisa Beutler, Stantec
 Natalie Cochran, Woodard & Curran
 Rick Iger, Provost & Pritchard
 Sam Cunningham, Provost & Pritchard
 Will Halligan, LSCE

1. Call to Order/Roll Call

Committee Chair Joe Hopkins called the meeting to order at 1:06 pm.

2. Pledge of Allegiance

Chair Hopkins led the pledge of allegiance.

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

There were no corrections or additions to the agenda items.

4. Opportunity for Public Comment

Chair Hopkins opened the floor for public comment and no public comments were provided.

Consent Calendar

5. Committee to Review and Take Action on the Consent Calendar

- a. Minutes of the August 11, 2025 Meeting
- b. Budget to Actual Report

MOTION

Committee Member Wiersma made a motion to approve the consent calendar as presented. Committee Member Hurley seconded the motion, and it passed unanimously.

Closed Session

6. Conference with Legal Counsel – Anticipated Litigation

The Committee will meet in closed session to confer with legal counsel on significant exposure to anticipated litigation pursuant to paragraph (2) of subdivision (d) of Government Code Section 54956.9: (2 cases)

The Committee entered closed session at 1:14 p.m.

Open Session

7. Report from Closed Session

The Committee returned from closed session at 2:02 p.m. and legal counsel Lauren Layne stated there was no reportable action.

Action Items

8. Review and Take Action to Recommend GSAs Adopt the Joint Powers Agreement

Ms. Layne provided background and summary on the revisions made to the JPA and unanimous voting provisions outlined in the draft document, which was provided in the meeting packet.

MOTION

Committee Member Lucchesi made a motion to approve the recommendation for GSAs to adopt the JPA. Committee Member Wiersma seconded the motion, and it passed unanimously. Ms. Layne and Mr. Blakslee will circulate a clean PDF version of the JPA to all the GSAs for adoption.

A Committee Member asked if the revised MOA can be adopted at the same time as the JPA and Ms. Layne replied that a revised MOA will be developed after the joint powers authority is officially formed (after all members sign the joint powers agreement).

9. Direction on Task Matrix and Basin Roles and Responsibilities

San Luis Delta-Mendota Water Authority Water Policy Director Scott Petersen provided background and summary on the purpose of the Task Matrix, which was provided in the CC meeting packet. He highlighted some of the questions outlined in the draft matrix for the Coordination Committee to consider and provide feedback by September 19, 2025. He stated that staff will incorporate that feedback and present common findings and any discrepancies back to the Committee at the next meeting.

Committee Member Hurley asked that a legend be added to the matrix before distribution.

10. Direction to Develop RFPs for Program Management and Technical Services

Mr. Petersen provided a brief update on the RFP development process for program management technical services. He reported he is pulling together example RFPs with similar needs of the Committee and will develop these RFPs to provide amounts for the budgeting process.

Committee Member Wiersma asked about the length of the potential contracts between the Authority and consultants and said if they are intended to be longer than one year, he would like to have more of a conversation and deliberation on the overall approach.

Mr. Petersen responded that he is assuming the contracts will be for initial one-year terms, followed by contract timelines consistent with direction from future JPA leadership. He highlighted the JPA will need accounting services, administrative, legal services and asked if the Committee would like to see multiple RFPs go out for different services, or one RFP to cover multiple tasks (i.e. general contractor or multiple subconsultants).

Chair Hopkins commented that he believes two RFPs are appropriate for Program Management and Technical Services.

11. Direction on GSA Requests to Modify the Grant Spending Plan

Natalie Cochran, with Woodard & Curran, provided background and summary on the requests received to modify grant spending plans, or amendments to allocations of grant monies. These included a request from Steve Stadler to move funds from Component 1 to Component 7 for San Luis Water District. Steve Chedester from San Joaquin River Exchange Contractors Water Authority indicated he will need to modify the language of the scope to ensure they can use remaining grant funds for the Los Banos Creek Restoration Project. Last, she stated she received a request from Bobby Pierce to move grant funds from component 13 to component 4 to support construction. She reported component 4 has been closed out at this point so staff would need to check with DWR if component 4 can be reopened.

Committee Member Hurley requested a table with each update be provided in a subsequent meeting.

12. Update on Subbasin Comments on DWR SGMA Subsidence Draft Best Management Practices

Legal Counsel Lauren Layne and EKI's Anona Dutton provided an update the California Department of Water Resources' (DWR) draft subsidence best management practices (BMPs) and the Delta-Mendota Subbasin comment letter. Ms. Layne noted that the letter will be finalized with an ad hoc, appointed by the Chair, (Jarrett Martin, Chase Hurley, Joe Hopkins, Will Halligan, and Rick Iger) and submitted following the DWR workshops in Clovis before the September 22nd deadline.

Report Items

13. Program Management Report

a. Review of Previous Meeting Action Items

Mr. Blakslee provided an update on the status of the previous meeting's action item. Mr. Blakslee will confirm that the Chowchilla and Westlands Water District comment letters were distributed.

b. Schedule of Key Milestones

Mr. Blakslee provided an overview of the schedule of key milestones, which is available in the meeting packet.

Mr. Petersen highlighted that there will need to be a detailed budget drafted for committee review in November. He noted there may be a parallel timeline of budget development and the RFPs being sent out.

14. Update on Facilitation Support Services Outreach Activities

a. Update on Status of Meetings with Adjoining Subbasins Regarding Comment Letters on Periodic Evaluations

Stantec outreach facilitator Lisa Beutler gave an overview of the status of the interbasin meetings, which was made available in the meeting packet. She mentioned that the Chowchilla discussions included subsidence, demand management, interconnected surface waters, and opportunities for future collaboration.

The Committee requested Committee Member Hurley be replaced with Patrick McGowan as the point of contact for the Westside GSA meeting.

Ms. Beutler also provided an update on the development of the newsletter. Chair Hopkins asked about a timeline for the newsletter and Ms. Beutler responded that the goal will be to make the newsletter public by mid-to-late October.

15. SWRCB Updates

a. Update on SWRCB Coordination

Alternate Committee Member Jarrett Martin provided a summary of coordination efforts with the State Water Resources Control Board. He commented that once the MOU Valley Water Collaborative MOU is signed by all entities, it will be sent to GSA representatives and SWRCB staff.

b. Update on GSA Adoption of the Domestic Well Mitigation Policy

Mr. Blakslee reported that staff is tracking GSA Board adoption (via minute order) of the domestic well mitigation policy and will provide updates on the status of execution.

c. Update on GSA Adoption of the Valley Water Collaborative MOU

Mr. Blakslee reported that 20 of 23 GSAs have adopted the Valley Water Collaborative MOU and that staff is following up with the remaining three GSAs.

16. SGMA Round 1 Implementation Grant

a. Update on Status of Interconnected Surface Water (ISW) Well Construction Project

Andrew Francis, with LSCE, provided updates on the status of the ISW well construction project, and his slides were provided in the meeting packet.

A Committee Member asked how the ISW grant-funded project will impact the subsidence project funding. Mr. Francis responded that he will provide an updated project cost estimate to Woodard & Curran which will inform the available funding for the subsidence project.

b. Update on Status of Subsidence Monitoring Project

Jarrett Martin reported that once he receives an update on available funding for this project, the equipment will be purchased.

c. Update on Status of All Grant Projects

Ms. Cochran reminded GSA representatives to send her project deliverables once available and provided a reminder to begin the project component completion reports once projects are complete. She provided an update on grant expenditures, which was included in the packet.

17. GSP Implementation Updates

a. Update on August Groundwater Level and Quality Monitoring and DMS Upload

Ms. Cochran reminded GSA representatives to collect third quarter (July-September) groundwater level and groundwater quality samples and to upload the data to the DMS by the end of the month.

b. Update on Pumping Reduction Plan and GSP Implementation Tracking and Exceedance Reporting

Ms. Dutton provided an update on the pumping reduction plan (PRP) dashboard, and the timeline for a walkthrough of the dashboard and tools for GSA representatives. She also provided updates on well trends of MT exceedance and voluntary actions taken to address those exceedances.

c. Report from GSAs with Exceedances

Mr. Blakslee provided an overview of the second quarter reporting period and noted we are still within the 60-day data review period.

John Wiersma left the meeting at 3:10 p.m.

18. Next Steps

- Distribute the JPA to GSA representatives with an execution of November 21, 2025.
- Distribute the Task Matrix with the legend and request GSA feedback.
- Develop FY2026 Budget components and timeline for ad hoc review.

- Include table of any grant spending plan changes to next CC packet.
- Schedule an ad hoc meeting to review EKI's Subbasin Comments on DWR SGMA Subsidence Draft Best Management Practices.
- Ensure Chowchilla/WWD comment letters have been distributed to all GSAs.
- Replace Committee Member Hurley with Patrick McGowan as the point of contact for the Westside GSA meeting.
- Provide updated ISW costs to inform the development of the subsidence budget.
- Hallmark Group to coordinate with EKI to set up PRP walkthrough sessions
- Chair Hopkins to send Aliso policy to EKI and W&C.

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

Nothing to report.

20. Next Meeting(s):

- a. Regular Coordination Committee Meeting: October 13, 2025

21. Adjournment

Chair Hopkins adjourned the meeting at 3:14 p.m.



2025 DELTA-MENDOTA SUBBASIN COORDINATION COMMITTEE MEETING DATES (2nd Monday)

October 13, 2025	1:00pm	SLDMWA Board Room 842 6th St., Los Banos, CA 93635
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November 10, 2025	1:00pm	SLDMWA Board Room 842 6th St., Los Banos, CA 93635
December 8, 2025	1:00pm	<i>Grassland Water District Board Room</i>

LIST OF ACRONYMS

CEQA	California Environmental Quality Act
DMS	Data Management System
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GSP	Groundwater Sustainability Plan
ISW	Interconnected Surface Water
JPA	Joint Powers Authority
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
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PRP	Pumping Reduction Plan
RMW	Representative Monitoring Wells
SLDMWA	San Luis & Delta-Mendota Water Authority (Authority)
SMC	Sustainable Management Criteria
SWRCB	State Water Resources Control Board

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
SGMA ACTIVITIES - COORDINATED COST-SHARE AGREEMENT
MARCH 1, 2025 - FEBRUARY 28, 2026
COORDINATED (FUND 63)
ACTIVITY AGREEMENTS BUDGET TO ACTUAL

Report Period 3/1/25 - 08/31/25

EXPENDITURES	Annual Budget	Paid/ Expense	Amount Remaining	% of Amt Remaining	Expenses Through
<u>Legal:</u>					
Baker Manock & Jensen	\$ 70,000	\$ 43,862	\$ 26,138	37%	8/4/25
<u>Other Professional Services:</u>					
GSP Implementation Contracts					
Coordinated Annual Report Activities (Common Chapter, Water Level Contouring)	\$ 149,675	\$ 95,410	\$ 54,265	36%	8/8/25
DMS Hosting, Augmentation and Support	\$ 12,000	\$ 3,612	\$ 8,388	70%	8/6/25
Staff Augmentation Support	\$ 200,000	\$ 90,432	\$ 109,568	55%	7/31/25
DAC Outreach and Coordination	\$ 20,000	\$ -	\$ 20,000	100%	
SGMA Implementation Grant Round 1 SPA (A9)	\$ 175,015	\$ 28,388	\$ 146,627	84%	8/8/25
Inadequate Determination Response (EKI)	\$ 55,000	\$ 44,496	\$ 10,504	19%	7/28/25
Interconnected Surface Water	\$ 504,455	\$ 61,275	\$ 443,180	88%	8/13/25
Domestic Well Mitigation Funds	\$ 100,000	\$ -	\$ 100,000	100%	
<u>Other:</u>					
Executive Director	\$ 750		\$ 750	100%	
General Counsel	\$ 1,000	\$ 78	\$ 922	92%	4/4/25
Water Policy Director	\$ 20,000	\$ 13,046	\$ 6,954	35%	8/31/25
In-House Staff	\$ 3,000	\$ 1,368	\$ 1,632	54%	8/31/25
Conferences & Training	\$ 1,000	\$ -	\$ 1,000	100%	
Travel/Mileage	\$ 1,500	\$ 70	\$ 1,430	95%	4/14/25
Group Meetings	\$ 5,000	\$ 52	\$ 4,948	99%	6/5/25
Telephone	\$ 500	\$ -	\$ 500	100%	
Equipment and Tools	\$ 2,000	\$ -	\$ 2,000	100%	
Total Expenditures	\$ 1,320,895	\$ 382,089	\$ 938,806	71%	



TO: Coordination Committee
Agenda Item No. 8

FROM: Scott Petersen / Taylor Blakslee

DATE: October 13, 2025

SUBJECT: Direction on Draft Budget Components

Recommendation

Committee direction requested on which budget components to include in the draft Fiscal Year 2026 budget with associated costs.

Discussion

During the September 8, 2025, Delta-Mendota Subbasin Coordination Committee (CC) meeting, the Committee directed staff to develop budget components for the Fiscal Year 2026 (March 1, 2026 – February 28, 2027) prior to presenting a completed draft budget to the CC in November 2025.

The Budget Ad hoc (Committee Members Joe Hopkins, Chase Hurley, and Auggie Ramirez) reviewed the draft budget components which is provided as **Attachment 1** for full Committee feedback.

Since this budget framework will be used as in the development of RFPs for Program Management and Technical services being developed by San Luis Delta-Mendota Water Authority, it is important to note that a key budgeting assumption is the Northern and Central Committees are budgeted under existing frameworks. However, solicitation of optional tasks to support management region agency administrative functions may occur in the future.

DRAFT**Delta-Mendota Subbasin Fiscal Year 2026 Budget**

March 1, 2026 - February 28, 2027

~~Red, strikeout~~ text indicates a budget component item the Budget ad hoc recommends not including at this time.

Task Matrix Ref#	FY 25 Budget Ref #	Budget Ref#	Budget Component	Notes
	11	1	Executive Director	
1		2	Track and Manage GSP Commitments & Schedule	
24-28		3	Board meeting facilitation	
		4	Consultant Management and GSP Implementation	
		5	Financial Management	
29		6	Budget Reporting	
30		7	Member Billing (GSA group cost share)	How to handle Northern and Central Committees?
31, 38		8	Grant Admin / Oversight	If any grants awarded.
		9	Other Direct Charges (Mileage, conference lines, copies)	
	1	10	Legal Counsel	
		11	Admin Expenses	
		12	Insurance (D&O)	
		13	Audit (FY 2025)	
		14	Outreach & Community Engagement	
39, 49, 50	6	15	Outreach and Coordination (GSAs, Public, Media, etc.)	
		16	Communication Plan Development	Including domestic well mitigation noticing.
		17	Website Development (ADA compliance)	
		18	Communications Plan Implementation	
		19	Interbasin Coordination	
32		20	Facilitate interbasin meetings (12 meetings)	
33		21	Technical support for interbasin meetings (12 meetings)	
34-36		22	Evaluation of subbasin GSPs / Annual Reports / Periodic evaluations	Contingency for executed contracts.
37		23	Attend adjacent subbasin GSA meetings	
		24	Monitoring Network	
2		25	Develop Standardized Data Collection and Reporting Methodology	
3-5		26	QA/QC of GW Level/Quality data before DMS upload	
6-8		27	Monitoring, Analysis and Reporting SMC Triggers/Exceedances (Dashboard)	
10		28	Semiannual data upload to SGMA portal	
11, 40		29	Coordination with Entity/GSA if issues arise	

Task Matrix Ref#	FY 25 Budget Ref #	Budget Ref#	Budget Component	Notes
		30	Subsidence:	
12		31	Review Data: Areas w/Critical Infrastructure	
		32	Placeholder pending DWR BMPs...	
13		33	Develop SOPs for SMCs	To be completed during FY 2025. HG to work with tech to develop
9		34	SMC Numeric Compilation and Updates (for SMC at new monitoring locations)	
42, 45		35	Assess and Potential Changes to RMW Network	
		36	Data Management System	
	4	37	Hosting, Maintenance, Support	
43		38	Optional Improvements (see options on excel worksheet)	
44		39	Annual Assessment of DMS	
46		40	Maintain Library of GIS Files/Mapping	
	3	41	Annual Report Development	
52		42	Data Review	
53		43	Preparation and Submittal	
54		44	Track GSP Changes for Inclusion in Periodic Evaluation/GSP Amendment	No need to budget, would tracked under GSP commitments, etc.
		45	GSP Implementation	
41		46	Support for GSP implementation	
22, 23, 47, 48	8	47	Coordination with Regulatory Agencies	SWRCB and/or DWR, etc.
		48	Projects and Management Actions	
14		49	Evaluation and Recommendations	
15		50	Implementation Oversight	
		51	Pumping Reduction Plan	
18		52	Subbasin Compliance Evaluation	
		53	Hosting, Maintenance	
		54	Communication with GSAs	
	10	55	Domestic Well Mitigation Program	
		56	Admin, Website Updates	
		57	Funding Mitigation Account	\$300,000 total, \$100k added annually.
		58	Grant Development	To be cost-shared by beneficiaries.
		59	Addressing Data Gaps	
16		60	Periodic Assessment	RFP item, not for budget.
17		61	Tracking Implementation to Address Gaps	RFP item, not for budget.
19	9	62	ISW Well Installation	RFP item, not for budget.
20		63	Install Subsidence Monitoring Stations	RFP item, not for budget.
		64	Annual Model Extension	
		65	Model Calibration	
		66	JPA Requirements	

<i>Task Matrix Ref#</i>	<i>FY 25 Budget Ref #</i>	<i>Budget Ref#</i>	Budget Component	Notes
		67	Specific items?	
		68	Specific items?	

Delta-Mendota Subbasin Coordination Committee Fiscal Year 2025 Budget

March 1, 2025 - February 28, 2026

	Category	Annual Budget (\$)
Legal:		
1	Baker Manock & Jensen	\$ 70,000
Other Professional Services:		
2	GSP Implementation Contracts	
3	Coordinated Annual Report Activities (Common Chapter, Water Level Contouring)	\$ 149,675
4	DMS Hosting, Augmentation and Support	\$ 12,000
5	Staff Augmentation Support	\$ 200,000
6	DAC Outreach and Coordination	\$ 20,000
7	SGMA Implementation Grant Round 1 SPA (A9)	\$ 175,015
8	Inadequate Determination Response (EKI)	\$ 55,000
9	Interconnected Surface Water	\$ 504,455
10	Domestic Well Mitigation Funds	\$ 100,000
Other:		
11	Executive Director	\$ 750
12	General Counsel	\$ 1,000
13	Water Policy Director	\$ 20,000
14	In-House Staff	\$ 3,000
15	Conferences & Training	\$ 1,000
16	Travel/Mileage	\$ 1,500
17	Group Meetings	\$ 5,000
18	Telephone	\$ 500
19	Equipment and Tools	\$ 2,000
Total Expenditures		\$ 1,320,895

Delta-Mendota Subbasin Tasking Matrix

ID	ACTIVITY	TASK	SUB-TASK	ACTION	Coord (FY26)	North (FY26)	Central (FY26)	GSA (FY27)	PM (FY27)	Legal (FY27)	Technical (FY27)
1	GSP Implementation	Program Management	Track and Manage GSP Commitments & Schedule	HG to coordinate with EKI for implementation support.	HG/EKI	HG/EKI		I	R	I	C
2	GSP Implementation	Groundwater Monitoring	Develop Standardized Data Collection and Reporting Methodology	Basic protocols are identified in the GSP but lacks a specific SoP. Who should develop SoP for all groundwater monitoring activities (items below)? EKI/ W&C?	EKI has done foundational work	EKI has done foundational work	EKI has done foundational work	I	C	I	R
3	GSP Implementation	Groundwater Monitoring	QA/QC: GW Level Data prior to DMS upload	Data upload remains with GSA, developed SoP will provide support. W&C/Tech Team to verify GSA entry with annual report scope.		W&C	W&C	R	C	I	C
4	GSP Implementation	Groundwater Monitoring	QA/QC: GW Quality Data prior to DMS upload	Data upload remains with GSA, developed SoP will provide support.		W&C	W&C	R	C	I	C
5	GSP Implementation	Groundwater Monitoring	QA/QC: Other Data	Data upload remains with GSA, developed SoP will provide support. W&C/Tech Team to verify GSA entry with annual report scope.				R	C	I	C
6	GSP Implementation	Groundwater Monitoring	Analysis of Data for Sustainability Indicators	Develop SoP to support. Suggest GSA report out to Tech Team to implement SoP. Is this the GSA or the Tech Team responsibility?	EKI has done foundational work	EKI under PRP	EKI under PRP	R	C	I	C
7	GSP Implementation	Groundwater Monitoring	Monitoring SMC Triggers/Exceedances	Develop SoP to support. Suggest GSA report out to Tech Team to implement SoP. Is this the GSA or the Tech Team responsibility?	EKI has done foundational work	EKI under PRP / W&C	EKI under PRP / W&C	R	C	I	C
8	GSP Implementation	Groundwater Monitoring	Reporting SMC Triggers/Exceedances	Develop SoP to support. Suggest GSA report out to Tech Team to implement SoP. Is this the GSA or the Tech team responsibility? If, Members/GSA, consider Panoche template to review with Coord Committee for alignment with MOA)	EKI has done foundational work	EKI under PRP / W&C	EKI under PRP / W&C	R	C	I	C
9	GSP Implementation	Groundwater Monitoring	SMC Numeric Compilation and Updates (for SMC at new monitoring locations)	GSA or Tech Team ownership? W&C monitoring, single GSP EKI? When set SMC at new wells? How has GSP weighed in?				I	C	I	R
10	GSP Implementation	Groundwater Monitoring	Data Upload to DWR SGMA Portal	Confirm HG/Plan Manager to upload to DWR portal? (Consider need for HG scope clarification)		W&C	W&C	I	R	I	C
11	GSP Implementation	Groundwater Monitoring	Coordination with Entity/GSA if issues arise	HG/Plan Manager ownership supported by Tech Teams. (EKI was optional task)	EKI proposed this as an Optional Task for 2025	EKI under PRP / W&C	EKI under PRP / W&C	I	R	I	C

Delta-Mendota Subbasin Tasking Matrix

ID	ACTIVITY	TASK	SUB-TASK	ACTION	Coord (FY26)	North (FY26)	Central (FY26)	GSA (FY27)	PM (FY27)	Legal (FY27)	Technical (FY27)
12	GSP Implementation	Subsidence Monitoring	Review Data: Areas w/Critical Infrastructure	Covered through end of year. Tech Team responsibility, for scope development discuss limitations of scope from EKI perspective, Look into technical resources for each GSA/zone re: optional tasks.	EKI proposed this as an Optional Task for 2025	EKI under PRP	EKI under PRP	I	C	I	R
13	GSP Implementation	MT Exceedance Response	Develop SOPs for SMCs	Who should develop SoP for SMCs? EKI/ W&C? Suggest develop staff proposal for GSA to collectively agree how to modify. Refer to MOA, who notices?	EKI proposed this as an Optional Task for 2025	EKI under PRP	EKI under PRP	I	C	I	R
14	GSP Implementation	Projects & Management Actions	Evaluation and Recommendations	HG/Plan Manager to track and report coordinated with Tech Team. (Consider need for HG scope clarification)				I	R	I	C
15	GSP Implementation	Projects & Management Actions	Implementation Oversight	HG/Plan Manager to track and report coordinated with Tech Team. (Consider need for HG scope clarification)				I	R	I	C
16	GSP Implementation	Data Gap	Data Gap: Periodic Assessment	HG/Plan Manager to track and report coordinated with Tech Team.				I	R	I	C
17	GSP Implementation	Data Gap	Data Gap: Tracking Implementation to Address Gaps	HG/Plan Manager to track and report coordinated with Tech Team. (Consider need for HG scope clarification)				I	R	I	C
18	GSP Implementation	Pumping Reduction Program Implementation	Technical Assistance	Tech Team to implement, HG/Plan Manager to provide process oversight.	EKI proposed this as an Optional Task for 2025	EKI	EKI	I	C	I	R
19	GSP Implementation	Interconnected Surface Water Well Installation	Coordinate efforts with Stanislaus & Merced Counties & Del Puerto WD	HG/Plan Manager to coordinate Merced / Stanislaus County compliance aligned for implementation, reps above and Andrew at LS. Construction and invoicing complete by end of December. CEQA done. (3 total, one in Patterson, 2 in progress) (Consider need for scope clarification)				I	R	I	C
20	GSP Implementation	Installation of Three New Subsidence Monitoring Stations	Coordinate with Coordination Committee and Grant Program	HG/Plan Manager. (Consider need for scope clarification) Ad Hoc to confirm next steps: Chase to reach out and report back: Jarrett managing his, others not managed would be good to consolidate purchasing. Jim (South), Adam (North), Joe Hopkins to complete concurrently and identify locations.				C	R	I	I

Delta-Mendota Subbasin Tasking Matrix

ID	ACTIVITY	TASK	SUB-TASK	ACTION	Coord (FY26)	North (FY26)	Central (FY26)	GSA (FY27)	PM (FY27)	Legal (FY27)	Technical (FY27)
21	SWRCB Engagement	Schedule/Coordinate SWRCB Staff Meetings	Schedule/Coordinate SWRCB Staff Meetings	Jarrett and EKI/Tech Team support.				R	I	I	C
22	SWRCB Engagement	Coordinate Support for SWRCB Meetings	Coordinate Support for SWRCB Meetings	EKI/Tech Team	EKI			I	I	I	R
23	SWRCB Engagement	GSA Technical Evaluation Support	GSA Technical Evaluation Support	EKI/Tech Team	EKI			I	I	I	R
24	Program Management	Monthly Meeting Preparation	Agenda	HG/Plan Manager for Coordinated/North.	HG: Draft SLDMWA: Review Chair: Review	HG: Draft SLDMWA: Review Chair: Review	HG: P&P Draft SLDMWA: Review Chair: Review	I	R	I	C
25	Program Management	Monthly Meeting Preparation	Budget to Actual	SLDMWA/Plan Manager				I	R	I	I
26	Program Management	Monthly Meeting Preparation	Minutes	HG/Plan Manager for Coordinated/North.	HG			I	R	C	I
27	Program Management	Monthly Meeting Preparation	Report Items	HG/Plan Manager, to coordinate with all teams.	EKI on specific items	EKI on specific items	EKI on specific items	C	R	C	C
28	Program Management	Monthly Meeting Preparation	Action Items	HG/Plan Manager	HG	HG		I	R	I	C
29	Program Management	Budget Tracking	Budget Reporting	SLDMWA, HG/Plan Manager (Consider need for HG scope clarification)	HG/SLDMWA	HG/SLDMWA		I	R	I	I
30	Program Management	Budget Tracking	Member Billing	SLDMWA, HG/Plan Manager (Consider need for HG scope clarification)	SLDMWA	SLDMWA		I	R	I	I
31	Program Management	Budget Tracking	Grant Funding	Grant Admin W&C/Tech Team Reimbursement Del Puerto.				I	C	I	R
32	Program Management	Interbasin Coordination	Schedule & Facilitate Interbasin Coordination Meetings	Managed by Stantec (Lisa Beutler). HG/Plan Manager to participate virtually (most anticipated 2026)	Stantec	Stantec		R	C	I	C
33	Program Management	Interbasin Coordination	Technical Support for Interbasin Coordination Meetings	EKI/Tech Team	EKI on specific items	EKI on specific items	EKI on specific items	I	C	I	R
34	Program Management	Interbasin Coordination	Adjacent Subbasin GSP Review: Evaluate for Consistency	Not scoped. EKI preliminary. Should it be done and by whom at what frequency? Will GSP engage in adjacent subbasins?				I	C	I	R

Delta-Mendota Subbasin Tasking Matrix

ID	ACTIVITY	TASK	SUB-TASK	ACTION	Coord (FY26)	North (FY26)	Central (FY26)	GSA (FY27)	PM (FY27)	Legal (FY27)	Technical (FY27)
35	Program Management	Interbasin Coordination	Annual Reports	W&C/Tech Team	W&C EKI proposed this as an Optional Task for 2025	W&C	W&C	I	C	I	R
36	Program Management	Interbasin Coordination	Periodic Review	Not scoped. Should it be done and by whom at what frequency? Will GSP engage in adjacent subbasins?	EKI has done foundational work						
37	Program Management	Interbasin Coordination	Adjacent Subbasin Meeting Attendance	Not scoped. Should it be done and by whom at what frequency? Will GSP engage in adjacent subbasins?	EKI has done foundational work						
38	Program Management	Grant Administration & Oversight	Grant Administration & Oversight	Grant Admin W&C/Tech Team Reimbursement Del Puerto. Additional scope for grant pursuits will need consideration. Possibility of GSP PMAs through SLDMWA grant program for SLDMWA members.	W&C			I	C	I	R
39	Program Management	Inquiry Response	Inquiry Response	HG/Plan Manager to coordinate with EKI/Tech Team	EKI on specific items			I	R	I	C
40	Administration	GSP Implementation	Monitoring Data: Communication & Support	HG/Plan Manager track, EKI/Tech Team support technical. (Consider need for HG scope clarification)	EKI has done foundational work / W&C	EKI under PRP / W&C	EKI under PRP / W&C	I	R	I	C
41	Administration	GSP Implementation	Implementation Evaluation: Communication & Support	To be addressed with JPA formation.	EKI						
42	Administration	GSP Implementation	Representative Monitoring Network: Assessment and Changes	W&C/Tech Team under annual report. EKI flagged as optional task; not yet approved. Under JPA, HG/Plan Manager oversight, Tech Team responsibility.	EKI proposed this as an Optional Task for 2025	EKI under PRP for GSP	EKI under PRP for GSP	I	C	I	R
43	Administration	GSP Implementation	Data Management System (DMS): Assessment	Hosting Houston (development/mods etc). W&C report/EKI GSP implementation/GSA input. Annual calls for improvements & modifications. Work this year or await JPA formation?	W&C	EKI proposed this as an Optional Task for 2025	EKI proposed this as an Optional Task for 2025	I	C	I	R
44	Administration	GSP Implementation	Data Management System (DMS): Future Updates (Tech Assistance)	Houston annual feedback with Tech Team annual calls for improvements & modifications.				C	C	I	R

Delta-Mendota Subbasin Tasking Matrix

ID	ACTIVITY	TASK	SUB-TASK	ACTION	Coord (FY26)	North (FY26)	Central (FY26)	GSA (FY27)	PM (FY27)	Legal (FY27)	Technical (FY27)
45	Administration	GSP Implementation	Track Changes to Monitoring Networks	Tech Team to implement, HG/Plan Manager to provide process oversight. (Consider need for HG scope clarification)		W&C	W&C	I	C	I	R
46	Administration	GSP Implementation	Maintain Library of GIS Files/Mapping	Tech Team to implement, HG/Plan Manager to provide process oversight. Plan Manager repository. (Consider need for HG scope clarification)				I	C	I	R
47	Administration	GSP Implementation	SWRCB Staff Meetings: Technical Review	EKI/Tech Team	EKI			I	C	I	R
48	Administration	GSP Implementation	SWRCB Meetings: Probationary Hearings	EKI/Tech Team	EKI			I	C	I	R
49	Administration	GSP Implementation	Outreach to Stakeholders/Interested Parties: Technical Assistance	Member in-kind services, Potential RFP.	EKI (specific topics and issues)			R	C	I	I
50	Administration	GSP Implementation	Outreach: Maintenance of Stakeholder Outreach List	Member in-kind services, Potential RFP.				R	C	I	I
51	Administration	GSP Implementation	Outreach: Maintenance of Delta-Mendota Website (including ADA compliance)	Member in-kind services, Potential RFP, timed w/ JPA transition.				R	C	I	I
52	Administration	GSP Implementation	Annual Reports: Data Collection and Reporting Standards	GSA data collection. DMS download by Tech Teams. Basic protocols are in the GSP. EKI/W&C (both GSP and annual report). Who should develop SoP? EKI/ W&C?	EKI / W&C	W&C	W&C	I	C	I	R
53	Administration	GSP Implementation	Annual Reports: Preparation and Submittal	W&C/Tech Team development. EKI to review for consistency with GSP as related to GSP implementation. Previous lag in GSA completion schedule caused compressed review timeline.	EKI (Only review) / W&C	EKI (Only review) / W&C	EKI (Only review) / W&C	I	C	I	R
54	Administration	GSP Implementation	Track GSP Changes for Inclusion in Periodic Evaluation/GSP Amendment	Not scoped. HG/Plan Manager oversight, Tech Team support. (Consider need for scope clarification)				I		I	
55	New Entity Formation/Management (FY26)	Formation of New Entity or join existing (Fall 2025)	Review Options for next step in conjunction with legal counsel	Legal to manage and identify processes for stand-up. HG to manage timeline and schedule for approvals and adoption. HG/Chase/Lauren outline expedited process together for JPA standup. Entity approvals/funding/timing.	Legal			I	C	R	

Delta-Mendota Subbasin Tasking Matrix

ID	ACTIVITY	TASK	SUB-TASK	ACTION	Coord (FY26)	North (FY26)	Central (FY26)	GSA (FY27)	PM (FY27)	Legal (FY27)	Technical (FY27)
56	New Entity Formation/Management (FY26)	Hire New Subbasin Manager (Effective March 1, 2026)	Work with Coordination Committee on "Job Description"	JPA to discuss at formation. Propose Coordination Committee Ad Hoc for formation?	SLDMWA			C	N/A	R	N/A
57	New Entity Formation/Management (FY26)	Hire New Subbasin Manager (Effective March 1, 2026)	Coordinate drafting of RFP	JPA to discuss at formation. Propose Coordination Committee Ad Hoc for formation?	SLDMWA			I	N/A	R	N/A
58	New Entity Formation/Management (FY26)	Communications Program	Website Updates & Management	JPA to discuss at formation. Propose Coordination Committee Ad Hoc for formation?	SLDMWA			I			
59	New Entity Formation/Management	Communications Program	Communications Plan	HG to support development with SLDMWA for JPA budget development.	SLDMWA/HG			I	R	I	C

Letter	Meaning	Role Description
R	Responsible	The entity/team that is scoped to complete the task or work and is answerable for the correct and thorough completion of the task.
C	Coordinated	Entity(ies) which must be coordinated with for resources/information before a decision or action is taken. Two-way communication.
I	Informed	Those who need to be kept up-to-date on progress or decisions. One-way communication.



TO: Coordination Committee
Agenda Item No. 9

FROM: Taylor Blakslee / Lisa Beutler

DATE: October 13, 2025

SUBJECT: Direction on Domestic Well Mitigation Policy Outreach

Recommendation

Committee direction requested.

Discussion

On August 11, 2025, the Coordination Committee recommended the Delta-Mendota Subbasin Groundwater Sustainability Agencies (GSAs) adopt the domestic well mitigation policy, and GSAs are currently adopting this at their respective Board meetings.

During a recent facilitation outreach meeting, a discussion was held regarding the level of outreach to support the domestic well mitigation program. Outreach commitments outlined in the domestic well mitigation policy and options for additional outreach are provided as **Attachment 1**.

Well Mitigation Policy - Public Outreach

Conducted to Date

- Opportunity for public comment with Draft GSP Discussed at public meetings

Implementation Commitment

Required:

- Coordination Committee agenda item (quarterly)
- Policy on Subbasin website with electronic filing for application
- Exceedance Notifications to domestic well owners to include information on policy and how to file a mitigation claim
- Coordination Committee review of groundwater level readings at least twice annually
- Cooperation between adjacent GSAs in proximate boundary exceedances

Optional:

- GSA agenda item (semi-annually in first year)
- Policy and link to subbasin's mitigation policy webpage added to GSA-specific websites
- GSA outreach to well user/owners related to exceedances
- GSA specific criteria, notification & protocols for exceedances
- Use of postcard mailings

Expectations

- The DWR Well Mitigation Template outlines expectations for outreach to disadvantaged communities.

These include guidelines for direct outreach to drinking water well users with a meaningful approach to engage and involve community members and organizations:

- Meet the community in suitable locations and at times when community members are available
- Communicate in the preferred language of drinking water well users
- Provide materials so community members can engage and understand technical information for a nontechnical audience.

Options

Baseline

- Press release with key facts, issued by the Subbasin. Template for use by the GSAs in their own communications.
- Information in the Subbasin Newsletter.
- Informational flyers in English and Spanish, and other key audience languages as needed.
- GSA posting of user-friendly flyers and policy (or links to information on the subbasin website).
- Briefing (can be done as webinar) on policy for all interested parties, with specific invitations to groups such as Self Help and Community Water Center and other known entities that work with impacted subbasin communities. Include translation. Record and provide a link on the Subbasin Website.



TO: Coordination Committee
Agenda Item No. 10

FROM: Anona Dutton / Lauren Layne

DATE: October 13, 2025

SUBJECT: Update on DWR Subsidence Workshop and Subbasin Comment Letter

Recommendation

None; informational only.

Discussion

On July 24, 2025, the California Department of Water Resources (DWR) released its [*Draft Best Management Practices on Managing Land Subsidence in California*](#) (BMP) for public comment. The document provides guidance for local water agencies to address land subsidence, protect groundwater-reliant communities, and meet Sustainable Groundwater Management Act (SGMA) objectives to avoid or minimize subsidence impacts. DWR held public meetings in Clovis, Delano, and Willows, and the BMP public comment period closed on September 22, 2025.

At the August 11, 2025, Delta-Mendota Subbasin Coordination Committee (DM CC) meeting, staff presented an overview of the draft BMPs and received Committee direction to develop comments. On September 8, 2025, the DM CC appointed an ad hoc (Joe Hopkins, Jarrett Martin, Chase Hurley, Rick Iger and Will Halligan) to finalize and submit a comment letter on behalf of the Delta-Mendota Subbasin, which was submitted to DWR on September 16, 2025, and is provided in **Attachment 1**.

The Association of California Water Agencies (ACWA) also submitted a comment letter to DWR, which is provided in **Attachment 2**.

DWR has stated it will release the final Subsidence BMP document following the review of public comments, but no specific date has been provided.

16 September 2025

Via Email to: sgmps@water.ca.gov

Paul Gosselin

Deputy Director

Department of Water Resources (DWR) Sustainable Groundwater Management Office

P.O. Box 942836

Sacramento, CA 94236

Subject: Comments on the Draft Land Subsidence Best Management Practice (July 2025)

Dear Mr. Gosselin,

On behalf of the Delta-Mendota Subbasin Coordination Committee, we appreciate the opportunity to review and provide input on the Draft Best Management Practice (BMP) for Land Subsidence released in July 2025. The guidance provided in the draft represents an important step in advancing sustainable groundwater management in California. We offer the following comments to enhance the clarity and applicability of the BMP, particularly for complex and interdependent basins such as the Delta-Mendota Subbasin.

1) Insufficient Direction on Interbasin Coordination and Regional Subsidence Management

As acknowledged in the BMP, groundwater (and resultant subsidence) does not conform to jurisdictional boundaries. The BMP appropriately emphasizes the need for regional coordination but it would benefit from more specific guidance as to how to address the circumstances wherein neighboring basins are not aligned in their approach to water level and subsidence SMCs and management plans, particularly where one basin's actions can affect another's ability to meet its SMCs or avoid URs (California Water Code § 10721(v)). Basins facing impacts from regional subsidence and complex hydrogeologic interdependencies, such as the Delta-Mendota Subbasin, would benefit from additional guidance on how to navigate these conditions effectively, especially considering the BMP's focus on mitigation and attribution. In particular, we request that the BMP be refined to address the following issues:

- Defining expectations for interbasin coordination and SMC alignment, especially where subsidence impacts originate beyond a GSA's jurisdictional control;
- Understanding how DWR and the State Water Resources Control Board (SWRCB) will evaluate GSP adequacy in cases where a basin has implemented appropriate local actions yet continues to experience subsidence due to external factors that are beyond a GSA's control;
- Documenting and addressing the limitations of coordination when adjacent basin actions are not fully aligned or collaborative solutions are not feasible; and
- Describing the technical approaches, methods, or tools that are recommended to be used to support and inform coordination or attribution analysis across basin boundaries, particularly where shared aquitards or regional cones of depression are present.

Given the regional nature of subsidence and the limitations individual GSAs may face in controlling external drivers, technical, strategic, and regulatory guidance on these issues is critical to ensure consistent and equitable implementation of SGMA across interconnected basins.

2) Clarification Needed on Implementation Timeline, Expectations, and Regulatory Use of BMP

The Draft BMP outlines a range of technical and policy expectations that build upon and expand previous DWR SGMA guidance documents. Many of the BMP elements, such as the use of analytical tools to evaluate subsidence risk, the establishment of quantitative thresholds tied to subsurface conditions and land use impacts, the coordination with relevant agencies and operators, and the development of programmatic responses to observed or projected subsidence, have already been addressed to varying degrees in the existing GSPs and through early implementation efforts. However, the BMP introduces more defined expectations that may differ in method or scope from what has been applied to date in basins with approved GSPs or recently completed Periodic Evaluations. These differences, combined with variation in implementation timing and capacity across GSAs and basins, create uncertainty about how, and to what extent, DWR will be relying on the BMP as part of its current and future GSP and/or Periodic Evaluation review processes.

It is also unclear how DWR and the SWRCB will account for asynchronous implementation vis a vis subsidence management across GSAs and basins, particularly in cases where coordination is still developing or subsidence persists despite local compliance (e.g., due to actions in neighboring basins or other non-SGMA causes such as oil and gas development or hydro-compaction). Additionally, the resources, time, and financial demands associated with meeting the BMP's expanded technical and policy expectations may pose challenges for some GSAs, especially within multi-agency subbasins, without targeted support or sufficient lead time.

Given the significance of the best practices described in the Draft BMP, additional clarity is needed on how the BMP will be used in regulatory evaluations of the GSPs and SGMA compliance, what level of alignment is expected in the near term, and whether financial or technical resources will be made available to assist GSAs in updating and implementing their approaches. This clarity will be essential for ensuring consistency, transparency, and continued momentum as basins move forward with subsidence management.

We appreciate DWR's continued efforts to provide technical guidance and support for sustainable groundwater management across California. The Draft BMP addresses a critical and complex issue, and its development is an important step in aligning technical understanding with management practice. As implementation continues and periodic evaluations approach, additional clarity on coordination, timing, and regulatory expectations will help ensure that local actions remain effective, equitable, and responsive to regional challenges. We welcome the opportunity to further engage with DWR on this topic and to contribute to the successful integration of the BMP into the SGMA framework.

Sincerely,



Joe Hopkins, Chair
Delta-Mendota Subbasin Coordination Committee



Sent via ELECTRONIC MAIL to sgmps@water.ca.gov

September 22, 2025

Mr. Paul Gosselin
Deputy Director of Sustainable Water Management
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

RE: Comment Letter – Draft Land Subsidence Best Management Practices

Dear Mr. Gosselin,

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide public comments to the Department of Water Resources (DWR) on its *Draft Land Subsidence Best Management Practices* (Draft BMP) document. ACWA represents approximately 470 public water agencies that collectively deliver approximately 90% of the water in California for domestic, agricultural, and industrial uses. As DWR considers how to best support groundwater sustainability agencies' (GSA) efforts to address subsidence through the development of this Draft BMP, ACWA offers the following comments.

a. General Comments

Comment 1: The Draft BMP should clearly delineate between recommended best management practices and statutory and regulatory requirements.

DWR should avoid any ambiguity between what is currently required by the Sustainable Groundwater Management Act (SGMA) and its associated regulations and what is recommended by the Final BMP. Throughout the Draft BMP it is unclear in places whether DWR is asserting existing regulatory authority or making recommendations under the umbrella of the Draft BMP. For example, at page 6-4, the Draft BMP states,

"The minimum threshold for subsidence should be reflective of local conditions. In areas that have not recently experienced land subsidence, the minimum threshold should be set to not allow the onset of subsidence. This could be zero or the measurement error of the monitoring equipment." [emphasis added]

ACWA's understanding is that the SGMA regulations do not require that GSAs prevent subsidence in basins without recent subsidence and it is a deviation from the minimum thresholds established by approved Groundwater Sustainability Plans (GSPs). In this instance the Draft BMP is suggesting that GSAs should go above and beyond what is required by law. ACWA suggests that DWR clearly indicate throughout the document where DWR is

referencing existing requirements and where it is making suggestions for the purposes of this BMP.

Comment 2: The timing of the Draft BMP poses a challenge for GSAs that have already begun work on their Periodic Evaluation.

SGMA requires GSAs to provide a Periodic Evaluation to DWR assessing their basin's GSP at least every five years. Water Code Section 10728.2 identifies the criteria that GSAs should consider when conducting their GSP evaluation and Section 356.4 of the GSP Regulations further details the components of a Periodic Evaluation. Many GSAs are currently working on their first periodic evaluation.

The Draft BMP recommends that GSAs include significant information related to subsidence in their Periodic Evaluation. The Draft BMP also recognizes that GSAs may need to adjust their project and management actions (PMA) in their GSP to address or avoid subsidence. Because so many GSAs are currently developing their Periodic Evaluation, ACWA suggests that DWR specifies in the document that the recommendations therein apply only to future Periodic Evaluations – not those currently underway.

Comment 3: The Final BMP should focus on technical guidance, not legal advice.

At page 4-13 (and other points throughout), the Draft BMP refers to liability related to subsidence. In one instance, the Draft BMP refers to a case in which a city was held liable. While this is likely intended to help GSAs, it suggests there could be exposure to liability, the assessment of which is outside the role of DWR and this BMP. The implication is concerning, because it confuses the responsibility of GSAs to manage under SGMA with liability for damages, which could only be tied to the use of groundwater.

Although GSAs have the duty to manage under SGMA, GSAs are not often groundwater water right holders and do not themselves extract groundwater and put it to beneficial use. Therefore, GSAs may take on management or mitigation under SGMA, but any such management or mitigation (or the lack thereof) can never result in liability for damages based on groundwater extractions. This is an important distinction that must be recognized in order for GSAs to continue to undertake their SGMA responsibilities. Liability is highly fact-dependent and there are not sufficient facts related to extractions for DWR to make sound conclusions or offer advice about the legal ramifications around subsidence. Although there is a disclaimer listed at the beginning of the document, these liability references are misplaced in this document. References to liability that are not based on existing law or widely agreed-upon case law should be removed to avoid confusion.

Comment 4: The Final BMP should emphasize the importance of local control.

A foundational tenet of SGMA is local determination of management decisions. SGMA appropriately recognizes that groundwater sustainability will be achieved most effectively and with the least disruption through local action that aligns with the needs and priorities of different communities around the state. There are instances in the Draft BMP that stray from this principle.

For example, at page 6-4 the Draft BMP states, “The definition of undesirable results for land subsidence should be made in conjunction with entities responsible for the operation and maintenance of the infrastructure and the specific tolerance of that infrastructure or

any mitigation that is proposed” [emphasis added]. The definition of undesirable results is a decision solely for the GSA. While ACWA agrees that consultation with other entities may be appropriate, we suggest that the document be revised to reflect that GSAs have sole decision making authority (with DWR’s review) with regard to defining undesirable results.

At page 6-6 the Draft BMP states, “In basins that have not experienced land subsidence, the measurable objective should be set at zero.” While ACWA understands this document is meant only as guidance, this statement is cause for concern. GSAs are empowered to make locally driven decisions around groundwater management. DWR should emphasize that while no measurable subsidence is ideal, there may be instances where small amounts occur and that the cost/benefit analysis of allowing small amounts of subsidence should rest solely with the GSA.

b. Section 4: Land Subsidence Fundamentals

Comment 5: Some of the concepts would benefit from clearer explanation and visual aids.

ACWA appreciates DWR’s work to create a shared understanding of subsidence in California, its causes, and the potential consequences. The concepts described in Section 4 of the Draft BMP are highly technical and difficult to absorb for all but the most advanced practitioners of hydrogeology and groundwater management. To the extent it is possible without overly complicating or elongating the final BMP, ACWA encourages DWR to refine Section 4 so that it is more approachable and easier to comprehend for less technical readers. While the Final BMP need not be a pop-up book, additional visual aids and clearer language would improve the Final BMP’s usability.

Comment 6: More information is needed on subsidence not caused by water extraction and other types of subsidence.

Many of the areas of the state most impacted by subsidence driven by groundwater extraction are also affected by other factors, such as oil extraction and seismic activity. While ACWA acknowledges that the overwhelming majority of subsidence is caused by the extraction of groundwater, additional guidance on how GSAs should account for oil-driven subsidence and seismic activity would be appropriate. The document could also be improved with guidance related to differential subsidence, which is currently not mentioned.

c. Section 5: Technical Assistance

Comment 7: DWR should provide additional technical assistance for GSAs to comply with the recommendations in the Final BMP.

The concepts and methods described in the Draft BMP are highly technical and complex. In some basins, complying with the recommendations of the Draft BMP could take decades of work and many millions of dollars that are not currently available to many GSAs. ACWA recommends that DWR discuss in detail the technical assistance and financial resources that will be made available to GSAs as part of following the recommendations of the Final BMP.

Comment 8: DWR should provide more information on how monitoring methods are meant to work together.

At page 5-14 DWR recommends that GSAs should rely on multiple data sources when monitoring changes in land surface elevation, such as InSAR and GPS. Section 5 of the Draft BMP would benefit from a more detailed explanation of why multiple sources are needed. This section – or the appendix – could also be improved with more detailed instructions on how groundwater managers should use multiple data sources to improve monitoring and management, including real world examples.

d. Section 6: Land Subsidence and the Sustainable Groundwater Management Act

Comment 9: DWR should provide clearer guidance on how to interface with other entities when quantifying how subsidence will impact infrastructure.

The Draft BMP suggests that GSAs coordinate with lead agencies responsible for infrastructure vulnerable to subsidence. The Draft BMP seems to assume that those lead agencies have the expertise and resources to assess how subsidence will affect infrastructure, which is not necessarily the case. Missing from this guidance is information on how to assess how subsidence impacts infrastructure. ACWA recommends including information and resources on how to contact and interact with the entities referenced, as well as guidance on how those entities should estimate subsidence impacts.

Comment 10: BMP guidance should be achievable.

At page 6-2, the Draft BMP states that “the quantitative definition of undesirable results should be based on a single exceedance of a minimum threshold anywhere in the basin.” The Draft BMP also recommends that the measurable objective for subsidence should be zero in basins that have not yet experienced subsidence (page 6-6). While ACWA shares DWR’s goal of limiting and reducing the spread of subsidence, zero tolerance for any subsidence anywhere for any reason sets GSAs up to fail. ACWA suggests revising the BMP to allow for a reasonable margin of error to better reflect the reality of groundwater management and to reflect the requirements of SGMA, which requires management to “avoid or minimize” subsidence that is “significant or unreasonable” (Water Code 10720-21.)

e. Section 7: Land Subsidence Management

Comment 11: Guidance related to mitigating the impacts of subsidence should be removed.

At page 7-9, the Draft BMP states, “The groundwater manager may consider the following actions to manage subsidence in this scenario: ... Provide mitigation for subsidence-related impacts to avoid undesirable results.” The Final BMP should focus on technical guidance to GSAs to assess and manage subsidence. Neither SGMA statute nor regulations require GSAs to mitigate the impacts of subsidence. References to mitigation throughout the document overstep the purview of a BMP and should be removed.

Comment 12: DWR should encourage GSAs in areas not historically prone to subsidence to focus on more relevant challenges.

Many GSAs are chronically under-resourced and must prioritize certain management activities and costs based on the needs of their basin. In many areas managed by GSAs,

subsidence has not historically been among the top challenges faced by groundwater managers. The limited staff and financial resources of GSAs should be put to their highest and best use, which for many GSAs is not subsidence management. As part of DWR's work to support and empower GSAs to fulfill the requirements of SGMA, ACWA strongly suggests that the Final BMP should acknowledge that subsidence management is not and should not be prioritized to the detriment of other activities in many basins.

Managing subsidence is a critical component of SGMA implementation and ACWA appreciates DWR's efforts to provide groundwater managers with guidance and support. In addition to these comments, ACWA also endorses the Groundwater Resources Association's (GRA) letter, which provides a valuable technical review of the Draft BMP. ACWA acknowledges that DWR is balancing many factors in the development of this Draft BMP and thanks you for considering our comments. Please contact me at SorenN@acwa.com if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Soren Nelson". The signature is fluid and cursive, with the first name "Soren" and last name "Nelson" clearly distinguishable.

Soren Nelson
Senior Policy Advocate
Association of California Water Agencies



TO: Coordination Committee
Agenda Item No. 11

FROM: Taylor Blakslee, Hallmark Group

DATE: October 13, 2025

SUBJECT: Program Management Report

Recommendation

None; information only.

Discussion

Provided as **Attachment 1** is an update on the following items:

- a. Review of Previous Meeting Action Items
- b. Schedule of Key Milestones

Delta-Mendota Subbasin

Meeting	Meeting Date	Agenda Item	Agenda Topic	Action Item	Assigned	Due Date	Status
Coordinated	9/8/2025, 10/13	8	Review and Take Action to Recommend GSAs Adopt the Joint Powers Agreement	GSAs Adopt the JPA by November 21, 2025. Staff track date of board adoption.	T. Blakslee	11/21/2025	In Progress
Coordinated	9/8/2025	9	Direction on Task Matrix and Basin Roles and Responsibilities	Staff to distribute Task Matrix and solicit Committee feedback.	K. Liddy	9/22/2025	Done
Coordinated	9/8/2025	11	Direction on GSA Requests to Modify the Grant Spending Plan	GSAs to send any requests to modify grant spending plans to Ms. Cochran by end of this week (9/12).	T. Blakslee	9/12/2025	Done
Coordinated	9/8/2025	12	Update on Subbasin Comments on DWR SGMA Subsidence Draft Best Management Practices	Ad hoc to review and provide feedback on the BMP comment letter for approval and distribution. Ad Hoc: J. Martin, C. Hurley, J. Hopkins, W. Halligan, Rick Iger.	K. Liddy	9/22/2025	Done
Coordinated	9/8/2025	13	Program Management Report	Confirm Chowchilla comment letters have been distributed. Will distribute if not.	K. Liddy	9/9/2025	Done
Coordinated	9/8/2025	13b	FY 2026 Budget Component Development	Staff to draft budget components for ad hoc review/Committee review. Draft budget with costs for review at November meeting.	T. Blakslee	10/13/2025	Done
Coordinated	9/8/2025	14	Update on Facilitation Support Services Outreach Activities	Ms. Beutler to change Patrick McGowan as POC for Westside meeting.	L. Beutler	10/1/2025	Done
Coordinated	9/8/2025	16a	Update on Status of Interconnected Surface Water (ISW) Well Construction Project	Andrew to provide updated ISW costs to W&C by 9-12-25 so subsidence budget can be set.	A. Francis	9/12/2025	Done
Coordinated	9/8/2025	16b	Update on Status of Subsidence Monitoring Project	Jarrett to facilitate purchase and install of subsidence equipment after budget set and communicated by W&C (due COB 9-12-25).	J. Martin	9/12/2025	In Progress
Coordinated	9/8/2025	17c	Report from GSAs with Exceedances	Coordinate with EKI to set up PRP walkthrough sessions. Joe to send Aliso policy to EKI and W&C.	K. Liddy, J. Hopkins	9/12/2025	Done

13. Delta-Mendota Coordination Committee of Schedule of Key Milestones³⁹

Taylor Blakslee



*Minor Corrective Action (MCA)



TO: Coordination Committee
Agenda Item No. 12

FROM: Lisa Beutler, Stantec

DATE: October 13, 2025

SUBJECT: Update on Facilitation Support Services Outreach Activities

Recommendation

None; information only.

Discussion

An overview of the interbasin basin meetings being scheduled and the status of those meetings and other outreach activities is provided as **Attachment 1**.

Delta Mendota Subbasin

Interbasin Coordination Meeting Scheduling

Subbasin	Delta Mendota Lead(s) & Other Delta Mendota Attendees	Subbasin Plan Manager, Other Key GSA Contacts	Subbasin Consultant Team(s)	Notes	Meeting Schedule
Tracy Subbasin	Vince Lucchessi (Lead) Adam Scheuber, Jarrett Martin, Joe Hopkins, John Wiersma, Chase Hurley, Matt Garcia	Ashley Couch (Lead), Venki Narasimhalu, Greg Gibson, Lea Emmons, Alex Chetley, Brandon Nakagawa, Danisha McDonald	Richard Schatz, GEI Anona Dutton, EKI	Agenda Items: - Tracy Subbasin Annual Report Highlights - Delta - Mendota Subbasin Annual Report Highlights - Overview and Status of Project Management Actions and discussions on options for potential collaboration and coordination - Cross Basin Considerations [Data Gaps, Other] - Next steps and Reflections of Subbasin Representatives Meeting Recording: https://youtu.be/0P0ixMHyIU	Completed, July 9, 2025
Chowchilla	John Wiersma, Jarrett Martin, Joe Hopkins, Amir Mani, Anona Dutton	Doug Welch, Lacey McBride, Sarah Woolf, Brad Samuelson	John Davids, Davids Engineering (Meeting point of contact) Pete Loeffler, LSCE Anona Dutton, EKI	Agenda Items: - DM Subsidence - Chowchilla Demand Management - Collaboration - ISW - Relationship building	Completed August 19, 2025
Madera	John Wiersma, Jarrett Martin	Stephanie Anagnoson TBD	John Davids, Davids Engineering (Point of Contact) Anona Dutton, EKI	Subbasin has requested to continue coordination through existing State Water Contractor discussions and elevate key issues to a subbasin meeting as needed	N/A

Subbasin	Delta Mendota Lead(s) & Other Delta Mendota Attendees	Subbasin Plan Manager, Other Key GSA Contacts	Subbasin Consultant Team(s)	Notes	Meeting Schedule
Merced	Chase Hurley, John Wiersma, Jarrett Martin, Joe Hopkins, Amir Mani, Anona Dutton, EKI	Matt Beaman, Merced ID (Lead) mbeaman@mercedid.org – 209-354-2859. Lacy McBride, Merced County	Jim Blanke & Chris Hewes (Point of Contact), Woodard & Curran-	Discussing Meeting Dates – Current Agenda Items: • Subsidence • Interconnected Surface Water • Pumping reduction planning • 2025 Update and periodic review • Impact of divergent subbasin MT assessments	Invitation sent for Oct. 29 - Chase Hurley will assist with follow-up if needed
Modesto / Turlock	Vince Lucchessi (Lead) Adam Scheuber, Jarrett Martin Amir Mani, Anona Dutton, EKI	Sarah Woolf Eric Thorburn (Point of Contact) Michael Cooke Lacey McBride Christy Mckinnon	Todd Groundwater Anona Dutton, EKI	Current Agenda Items • Projects and data of mutual interest • Potential hot-spots or areas of concern • Management approaches • Updates on models	Second try on scheduling - Tentative Oct. 29, Dependent on scheduling for Merced.
Kings	Joe Hopkins, Jarrett Martin, Jim Stilwell, Auggie Ramirez Amir Mani, Anona Dutton, EKI	Will coordinate through Ronald Samuelian - Provost & Pritchard Consulting Group		Discussing Meeting Dates Current Agenda Items: • Measurable Objectives • Minimum Thresholds • Subsidence • Demand Management • Water Budgets	Invitation sent. Looking for some additional dates and times that will work.
Westside	Patrick McGowan, Steve Stadler, John Wiersma, Jarret Martin, Joe Hopkins Anona Dutton, EKI	Coordinating through Kitty Campbell (Westlands)	Will Halligan Luhdorff and Scalmanini	Current Agenda Items • Water Quality • Minimum Thresholds • Subsidence • Groundwater Budget	Invitation Sent for Oct. 30
East San Joaquin	N/A	Julia Berry (Point of Contact) San Joaquin County Brandon Nakagawa		No additional action needed at this time	N/A



TO: Coordination Committee
Agenda Item No. 14

FROM: Taylor Blakslee, Hallmark Group

DATE: October 13, 2025

SUBJECT: SGMA Round 1 Implementation Grant

Recommendation

None; information only.

Discussion

a. Update on Status of Interconnected Surface Water (ISW) Well Construction Project

LSCE Project Hydrogeologist Andrew Francis has provided a project update included in **Attachment 1**.

b. Update on Status of Subsidence Monitoring Project

Grant-funded equipment is being purchased and a verbal update will be provided at the Committee meeting.

c. Update on Status of All Grant Projects

Several grant components changes were discussed at the September 8, 2025 Committee meeting. A summary of those changes that are being included in grant amendment No. 5 are included in **Attachment 2**, which have been prepared by Woodard & Curran grant manager Leslie Dumas.

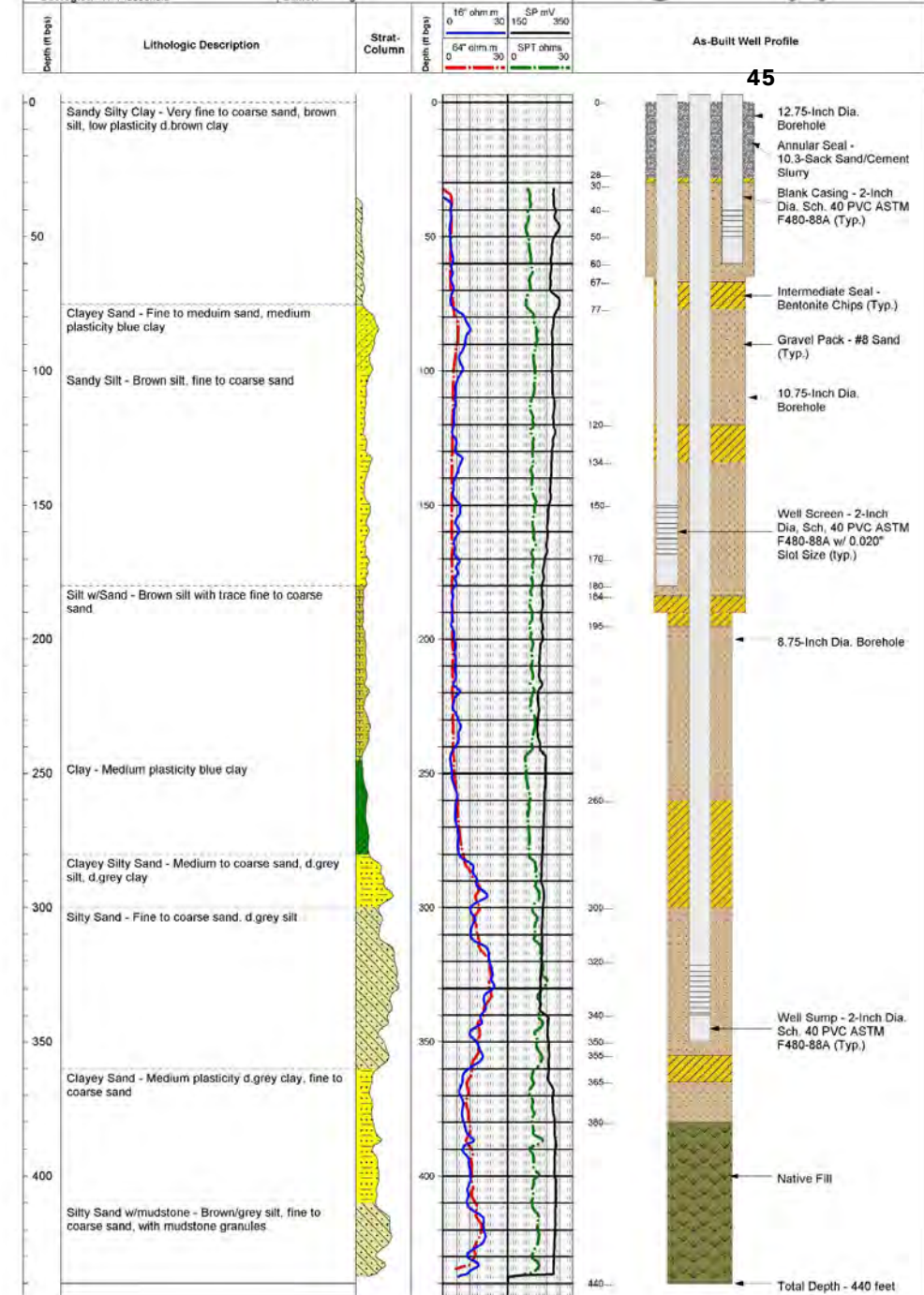
ISW-3 Merced County/CDFW

- Well completed on 9/22
- Depth to water measurements on 9/25:
 - Shallow: 12.03'
 - Middle: 10.81'
 - Deep: 46.94'
- Required more construction management time than expected due to driller experience.



ISW-3 Merced County/CDFW

- Well completed on 9/22
- Depth to water measurements on 9/25:
 - Shallow: 12.03'
 - Middle: 10.81'
 - Deep: 46.94'
- Required more construction management time than expected due to driller experience.



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Delta-Mendota Grant Agreement Amendment 5 Changes

COMPONENT	CATEGORY	REQUEST
COMPONENT 1	Funding	Internal transfer of \$750,000 from Component 1 Category (c) to Component 7 Category (c)
	Project Description	Removal of construction-related tasks from this component, and rescoping to include only Category (b) tasks
	Deliverables	Removal of all Component (c) deliverables
COMPONENT 2	Funding	No requested changes in funding
	Project Description	Modifications to scope of work to be completed to include project design, permitting and environmental clearance, the construction of two water control structures and the construction of two pipelines. This change removes the following items from those to be constructed under this component: • Installation of between 1 to 5 flow meters on water diversion structures • Installation of between 1 and 3 internal water control structures • Construction and instrumentation of between three and six groundwater level monitoring wells • Installation of between three and six water quality sensors in the monitoring wells
	Deliverables	Removal of deliverables associated with the construction items to be removed such that component deliverables include: • Environmental documentation • Cultural permitting • Construction documentation and as-builts for two water control structures • Construction documentation and as-builts for two water conveyance pipelines
COMPONENT 3	Funding	No requested changes in funding
	Project Description	Modify scope to include only construction of the Chowchilla Bypass turnout, consisting of two 50 cfs fish screens, a reinforced concrete fish screen vault, a reinforced concrete gate control box, a 72-inch pipeline that connects the fish screen vault and gate control box, a 48-inch pipeline through the levee to a flanged outlet for pumps to connect, and associated appurtenances
	Deliverables	No changes in component deliverables
COMPONENT 7	Funding	Internal transfer of \$750,000 from Component 1 Category (c) to Component 7 Category (c) for new Category (c) component budget of \$1,350,000
	Project Description	Modify scope to include only construction of the 36-inch diameter discharge pipeline and a 450 cfs box culvert crossing
	Deliverables	No changes in component deliverables



TO: Coordination Committee
Agenda Item No. 15

FROM: Taylor Blakslee, Hallmark Group

DATE: October 13, 2025

SUBJECT: GSP Implementation Updates

Recommendation

None; information only.

Discussion

a. Update Groundwater Level Monitoring and DMS Upload

Groundwater level and quality monitoring data for the third quarter (July-September) was due on September 30, 2025. Measurements are still being updated in the data management system, and a report on the results will be provided when available.

b. Update on Pumping Reduction Plan and GSP Implementation Tracking and Exceedance Reporting

Dashboard walkthrough meetings for the four basin zones have been scheduled for this year, and a verbal update will be provided by EKI.

Four Zones:

1. Aliso, Farmers, and Fresno
2. Grassland and San Joaquin Exchange Contractors
3. Northern
4. Central

c. Update on Water Year 2025 Annual Report Development

An update on the development and schedule for the Water Year 2024-2025 Annual Reports is included as **Attachment 1**.

Part of the Annual Report development requires an update to the subbasin model to calculate several required reporting requirements. On June 9, 2025, the Coordination Committee authorized EKI to perform this model update and EKI distributed a Request For Information (RFI) to the GSAs to perform this update. Data is due to EKI by October 24, 2025, and a summary of the RFI and model update is provided as **Attachment 2**.

d. Report from GSAs with Exceedances

The following GSA's will provide updates on third quarter groundwater level and quality exceedances:

- Groundwater Levels:
 - o 3 wells in Aliso WD GSA
 - o 2 wells in Central D-M GSA
 - o 2 wells in Grassland GSA
- Groundwater Quality:
 - o Nitrate:
 - 1 well in Northern D-M (DM-II)
 - o TDS:
 - 3 wells in Central D-M GSA
 - 1 well in Widren WD GSA
 - 1 well in Grassland GSA (1 well exceeds MT only)
 - 2 wells in Northern D-M (DM-II and City of Patterson)

Water Year 2024-2025 Annual Report Schedule



DRAFT



ANNUAL REPORT MODEL EXTENSION: REQUEST FOR INFORMATION

PURPOSE OF RFI

- The Model was extended through WY 2023 for GSP development, but relied on assumptions for WY 2023.
- Data for WY 2023–2025 are needed to extend the model and support preparation of the Annual Report for WY 2025
- Data request is very similar to the previous modeling and P/MA RFI, using similar templated, but involved more focused set of data.
- Requested Data:
 - **Surface Water Supplies:** deliveries, diversions, transfers, exports (CVP, SWP, San Joaquin River, tributaries, recycled water, stormwater, etc.), by source and place of use
 - **Groundwater Pumping:** metered well records (location, interval, aquifer) or GSA-wide estimated pumping (with method described), and GW used for transfers or recharge
 - **Local Land Use:** shapefiles if different from what is shared by DWR
 - **Projects & Management Actions (P/MA):** recharge volumes, transfers, and project-specific data (by project name, location, and source of supply)

RFI RESPONSE AND NEXT STEPS

- Templates were provided to facilitate data transfer from GSAs and streamline formatting. These templates were used previously as part of GSP development:
 - Data-sharing Template (Excel): structured tables for surface water and groundwater pumping, including metadata (timing, location, aquifer, units)
 - P/MA Template (Excel): project-specific recharge, transfers, and management action data with project name, source, and location
 - If Land Use data is to be shared, please share zipped GIS files with EKI.
- Schedule & Next Steps
 - RFI Responses are due **October 24, 2025**
- Next Steps:
 - EKI to incorporate data into model extension through WY 2025
 - Results to be summarized and presented at the Coordination Committee (December 2025 or January 2026)
 - Model extension will support Woodard & Curran's preparation of the Annual Report