

INTRODUCTION

1 PURPOSE OF THE GROUNDWATER SUSTAINABILITY PLAN

The purpose of this Groundwater Sustainability Plan (GSP or Plan) is to meet the regulatory requirements set forth in the three-bill legislative package consisting of Assembly Bill (AB) 1739 (Dickinson), Senate Bill (SB) 1168 (Pavley), and SB 1319 (Pavley), collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA defines 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.” Undesirable Results (URs) are defined by SGMA as any of the following effects caused by groundwater conditions occurring throughout a basin:

- Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply;
- Significant and unreasonable reduction of groundwater storage;
- Significant and unreasonable seawater intrusion;
- Significant and unreasonable degraded water quality;
- Significant and unreasonable land subsidence; and/or
- Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water.

The Delta-Mendota Subbasin (California Department of Water Resources [DWR] Basin No. 5-022.07; referred to herein as the “Basin”) of the San Joaquin Valley Groundwater Basin is a critically overdrafted basin located in portions of San Joaquin, Stanislaus, Merced, Fresno, Madera, and San Benito Counties. This GSP has been developed to meet SGMA regulatory requirements (see **Appendix A**) while reflecting local needs and preserving local control over water resources.

As described further below, this GSP was explicitly prepared to address DWR’s “inadequate” determination and provide an update on groundwater conditions in the Basin. This amended GSP will supersede the six GSPs, Common Chapter, and the Coordination Agreement that were submitted to DWR in January 2020 (referred to herein as the “2020 GSPs”) and amended and resubmitted in July 2022 (referred to herein as the “2022 GSPs”).

1.1 Background

As described in **Section 5**, this GSP was jointly prepared by seven Groundwater Sustainability Agency (GSA) Groups – the Aliso Water District GSA Group, the Farmers Water District GSA Group, the Fresno County Management Areas A and B (FCMA) GSA Group, the Grassland GSA Group, the Northern Delta-Mendota GSA Group, the Central Delta-Mendota GSA Group, and the San Joaquin River Exchange Contractors (SJREC) GSA Group – which are made up of the 23 Basin GSAs.

The 2020 GSPs were collectively designated as “incomplete” by DWR in its 21 January 2022 letter entitled *“Incomplete Determination of the 2020 Groundwater Sustainability Plans Submitted for the San Joaquin*

Valley – Delta-Mendota Subbasin” (**Appendix B**). The Basin GSAs revised their respective GSPs and the Common Chapter per DWR’s comments and resubmitted the GSPs in June 2022 (referred to herein as the “Revised 2022 GSPs”).

The Revised 2022 GSPs were deemed “inadequate” by DWR in its 2 March 2023 letter entitled “*Inadequate Determination of the Revised 2020 Groundwater Sustainability Plans Submitted for the San Joaquin Valley – Delta-Mendota Subbasin*” (**Appendix B**). As such, the Basin is subject to the State Water Resources Control Board (SWRCB) intervention process per California Water Code (CWC) § 10735 et seq. Under this statute, the SWRCB may designate a basin as “probationary” after holding a public hearing (CWC § 10735.2(a)). If a basin is designated as probationary, the SWRCB may adopt an interim plan to fix the deficiencies that resulted in probationary status, which could potentially include: “(1) Restrictions on groundwater extractions, (2) A physical solution, (3) Principles and guidelines for the administration of rights to surface waters that are connected to the Basin” (CWC § 10735.8(c)).

If the Basin is designated as “probationary”, a GSA or authorized person may petition to exit the SWRCB intervention process or have the interim plan modified if “the [SWRCB], in consultation with [DWR]], determines that the groundwater sustainability plan or adjudication action is adequate” (CWC § 10735.8(g)).

In response to DWR’s “inadequate” determination and prior to the Basin’s probationary hearing, the Basin GSAs collectively agreed to develop a single GSP for the Basin that synthesizes, updates, and replaces content from the Revised 2022 GSPs and Common Chapter to address the Corrective Actions outlined by DWR in its March 2023 “Inadequate” Determination Letter. As of xx 2024, all the Basin GSAs adopted this GSP as a GSP for submission to DWR and the SWRCB (see **Appendix C**). This GSP provides a path to maintain and document sustainable groundwater management in the Basin and preserves the long-term sustainability of locally managed groundwater resources.

Since January 2022, the Basin GSAs have participated in numerous Basin-wide coordination efforts to develop a coordinated response to DWR’s Corrective Actions. Basin-wide coordination efforts have included the following:

- Adoption of a new Memorandum of Agreement (MOA) between the Basin GSAs on xx 2024;
- Basin Coordination Committee meetings with GSA Group representatives;
- Basin ad-hoc Technical Subcommittee meetings with GSA Group representatives and technical staff;
- Consultation meetings with DWR and SWRCB staff (see **Table Intro-1**);
- Intra- and Inter-basin stakeholder outreach and engagement efforts (see **Section 5.5**)

As summarized in **Table Intro-1**, the GSAs participated in six meetings with DWR and SWRCB staff to provide updates on the Basin’s coordinated response to the DWR-identified deficiencies, including technical justifications for Sustainable Management Criteria (SMC) and ongoing Plan revisions. Specific revisions to the Revised 2022 GSPs and Common Chapter, as part of the synthesis into this single GSP and in response to DWR’s Determination Letter, are summarized below in **Section 1.2**. **Section 1.3** describes

the revisions that were further made to update the Plan by incorporating new information, data, and the best available science.

Table Intro-1. Summary of Basin Meetings with DWR and SWRCB Staff

Meeting Date	Topic(s)	Summary
3/23/2023	State intervention process	DWR and SWRCB staff reviewed the state intervention process and the timeline for the Basin’s probationary hearing with the GSAs.
7/26/2023	Technical Meeting #1 <ul style="list-style-type: none"> • Basin Coordination Efforts • Water Budget • Sustainable Yield and Change in Storage Estimates • Revised SMCs (Groundwater Levels, Groundwater Storage, Water Quality, and Land Subsidence) 	Basin management presented the Basin’s plan to develop a coordinated GSP, including a preliminary update on the development of a Basin-wide Water Budget and revised SMCs (to be discussed further in future meetings). <i>SWRCB staff expressed support for the development of a coordinated GSP and provided general guidance for developing Undesirable Results, to be discussed further in future meetings.</i>
9/13/2023	Technical Meeting #2 <ul style="list-style-type: none"> • Proposed Well Mitigation Policy • Revised Water Quality SMCs 	Basin management sought input from SWRCB regarding models from other basins for a Well Mitigation Policy. <i>SWRCB staff stated that well mitigation programs developed in other groundwater basins may not work in the Basin, and the Basin should refer to DWR’s Corrective Actions from other plans when developing the program.</i> Basin management proposed a process to screen for water quality COCs and set SMCs for the applicable COCs. <i>SWRCB staff emphasized that SMCs should be set to prevent degradation of water quality beyond 2015 levels, and the GSAs should not screen out COCs that were reported to have MCL exceedances in at least three wells within the Basin since 2015 due to concerns that they could be impacted by groundwater management.</i>

Meeting Date	Topic(s)	Summary
10/11/2023	Technical Meeting #3 – Land Subsidence <ul style="list-style-type: none"> • Review of existing subsidence data and P/MAs to address subsidence • Revised Land Subsidence SMCs 	Basin management summarized work the Basin has conducted to date to understand and address subsidence conditions in the Basin. <p><i>SWRCB staff emphasized the need for coordination with neighboring basins to address subsidence hot spots.</i></p> Basin management presented the revised land Subsidence SMCs and monitoring plan for SWRCB input. <p><i>SWRCB staff did not have major comments on the proposed SMCs; however, staff expressed concern about the feasibility of differentiating between subsidence caused by Basin groundwater extraction and subsidence caused by other entities.</i></p>
12/20/2023	Technical Meeting #4 <ul style="list-style-type: none"> • Revised SMCs (Groundwater Levels and Groundwater Storage) • Well Impacts Analysis • GDE Impacts Analysis 	Basin management presented the revised SMCs for Chronic Lowering of Groundwater Level and Reduction of Groundwater Storage and a justification of these SMCs using well and GDE impacts analyses. <p><i>SWRCB staff agreed with setting MTs as the 2015 Lows and encouraged the Basin to include a quantitative threshold for the number of dewatered wells in the Undesirable Results definition.</i></p>
2/21/2024	Technical Meeting #5 <ul style="list-style-type: none"> • Revised SMCs (Degraded Water Quality) 	Basin management presented the proposed approach for Degraded Water Quality SMCs and a justification of these SMCs through analysis of groundwater data and trends in the Basin. SMCs were established for all SWRCB-identified COCs (SWRCB, 2022). <p><i>SWRCB staff agreed with setting SMCs for all identified COCs and emphasized the need for expanded future monitoring of groundwater quality throughout the Basin.</i></p>

Meeting Date	Topic(s)	Summary
4/10/2024	Technical Meeting #6 <ul style="list-style-type: none"> Summary of Response to DWR Deficiencies 	Basin management presented a summary of revisions to the GSP in response to DWR’s deficiencies, including revisions to SMCs, the Water Budget, and addressing overdraft through P/MAs such as the Basin’s Pumping Reduction Plan. <i>SWRCB staff were supportive of the Basin’s adaptive management approach demonstrated by the Pumping Reduction Plan. They expressed concern over the Degraded Water Quality Undesirable Results criteria, which were subsequently revised in response to SWRCB comments.</i>
6/X/2024	Insert	Insert

Abbreviations:

- | | |
|---|---|
| COCs = Constituents of Concern | MCL = Maximum Contaminant Level |
| DWR = Department of Water Resources | MT = Minimum Threshold |
| GDE = Groundwater Dependent Ecosystems | P/MAs = Projects and Management Actions |
| GSA = Groundwater Sustainability Agency | SMCs = Sustainable Management Criteria |
| GSP = Groundwater Sustainability Plan | SWRCB = State Water Resources Control Board |

1.2 Summary of Major Plan Revisions to Address the Deficiencies

DWR’s January 2022 “incomplete” determination letter outlined four deficiencies and associated Corrective Actions for the GSAs to address within a 180-day window (**Appendix B**). After GSP revisions and resubmittal in July 2022, DWR designated the Revised 2022 GSPs as collectively “inadequate” in March 2023 and determined that the Basin had sufficiently addressed only one out of the four identified deficiencies (Deficiency #4).

After consultation with DWR and SWRCB staff, the following revisions were made to the Plan to address the remaining three DWR-identified deficiencies and to improve overall Basin coordination efforts.

Deficiency #1 – The GSPs do not use the Same Data and Methodologies

Corrective Action 1. *“The Common Chapter and the Technical Memoranda do not provide sufficient explanation to confirm that the GSPs have been developed using the same data and methodologies and that elements of the GSPs have been based upon consistent interpretations of the Subbasin’s setting. As presented, the GSPs use different data and different methodologies that rely upon multiple versions of the Subbasin setting, with many of the GSPs defining their own version of a hydrogeological conceptual model, often for very small areas of the Subbasin. The 23 GSAs developing the six GSPs should provide supporting information that is sufficiently detailed and provide explanations that are sufficiently thorough and*

reasonable to explain how the various components of each GSP will together achieve the Subbasin's common sustainability goal. The explanation should describe how the sustainable management criteria established for each GSP (including the management areas if applicable) relate to each other and how they are collectively informed by the basin setting, including the water budget, change in groundwater storage, and sustainable yield, on the Subbasin-wide level."

This Plan includes the following major revisions to address Deficiency #1:

- Adopted a new MOA among the Basin GSAs to implement a single GSP, achieve a common Sustainability Goal, and emphasize collective implementation (see **Section 3.2**).
- Developed a single GSP that incorporates and synthesizes information from the six 2022 Revised GSPs and Common Chapter and articulates how the Basin GSAs will together achieve the Basin's common Sustainability Goal.
- Established a uniform Basin Setting, including a common Hydrogeological Conceptual Model (HCM), water budgets, sustainable yield, and change in groundwater storage for the Basin that were developed using the same data and methodologies (see **Sections 7, 8, and 9**).
- Revised the SMCs to be consistent across the Basin and use the same data and methodologies that are collectively informed by the uniform Basin Setting (see **Section 1313**).
- Established a Basin-wide monitoring network that refines and synthesizes the six individual monitoring networks outlined in the 2022 Revised GSPs (see **Section 1414**).
- Developed a Basin-wide Pumping Reduction Plan (PRP) to be implemented by 2025 that outlines the measures the GSAs will take to achieve sustainability, including a 42,000 acre-feet per year (AFY) pumping reduction by 2030 (**Section 16.1.1**) and other adaptive management measures.

Deficiency #2 – The GSPs Have Not Established Common Definitions of Undesirable Results in the Subbasin.

Corrective Action 2. "The GSAs in the Subbasin should modify each of their respective GSPs, as well as any applicable coordination materials, to substantially comply with the GSP Regulations and define undesirable results in a manner that addresses groundwater conditions occurring throughout the Subbasin, not for only the small portion of the Subbasin represented by the respective GSPs. One way for this deficiency to be remedied is for each of the six separate GSPs to use the same quantitative minimum thresholds, or the same methodology to develop the thresholds, and explicit criteria for undesirable results. Alternatively, if the GSAs believe it is not possible, or for some other reason still desire to use different definitions and metrics for undesirable results within each of the Subbasin's six GSP areas, the Plan must specifically explain how any differences do not affect the requirement to utilize the same data and methodologies for the assumed sustainable yield of the Subbasin. Additionally, if a GSP determines that a sustainability indicator is not applicable within the defined GSP area, then that information must be supported by the best available information and best available science."

This Plan includes the following major revisions to address Deficiency #2:

- Updated Basin-wide criteria for Undesirable Results for each applicable Sustainability Indicator, including explicit (i.e., quantitative) criteria for the Undesirable Results (see **Section 1313**).
- Revised SMCs for each applicable Sustainability Indicator informed by the best available data and information included in the uniform Basin Setting (see **Sections 1313**).
- Used common Basin-wide methodologies to revise the Measurable Objectives (MOs), Minimum Thresholds (MTs), and Interim Milestones (IMs; see **Section 1313**) for each applicable Sustainability Indicator, informed by the best available data and information included in the uniform Basin Setting.

Deficiency #3 – The GSPs in the Subbasin Have Not Set Sustainable Management Criteria in Accordance with the GSP Regulations.

Corrective Action 3. *“The GSAs in the Subbasin should adhere to Subarticle 3 of the GSP Regulations which describes sustainable management criteria. The Plan should explain the coordinated criteria by which the GSAs define conditions occurring throughout the Subbasin that constitute sustainable groundwater management, including the process or processes by which the GSAs characterize undesirable results, establish minimum thresholds, and set measurable objectives for each applicable sustainability indicator. Undesirable results should be coordinated and should define when significant and unreasonable effects for any of the sustainable indicators are caused by groundwater conditions occurring throughout the Subbasin, not only in small GSP areas or even smaller management areas. The minimum thresholds must set numeric values that, if exceeded, may cause undesirable results, and must be defined in accordance with 23 CCR § 354.28(c). The supporting information must be sufficiently detailed and the analyses sufficiently thorough and reasonable, and any effort to disregard the applicability of a sustainability indicator in a GSP must be supported by the best available information and best available science. Additionally, if management areas will continue to be used throughout the Subbasin, the management areas must comply with 23 CCR § 354.20, as discussed in Deficiency 4.”*

This Plan includes the following major revisions to address Deficiency #3:

- Revised Basin-wide definitions for SMCs for each applicable Sustainability Indicator at all Representative Monitoring Sites (RMS) informed by the best available data and information included in the uniform Basin Setting (see **Section 13**).
- Used explicit (i.e., quantitative) criteria for Undesirable Results that define the groundwater conditions, including a description of the Basin-wide groundwater conditions that constitute Undesirable Results for each Sustainability Indicator and “significant and unreasonable” effects on groundwater users that the GSAs seek to avoid (see **Section 13**).
- Described the process used by GSAs to define Undesirable Results, establish the MTs and MOs, and set IMs for each applicable Sustainability Indicator (see **Section 13**).
- For Chronic Lowering of Groundwater Levels, added a well impacts analysis to the justification of criteria for Undesirable Results that demonstrates in the worse-case scenario, 98 drinking water wells will be impacted, which is within the scope of the Well Mitigation Policy to address (see **Section 13.1.2.4**).

1.3 Summary of Major Plan Updates

The following updates were made to the Plan to incorporate new information, data, and the best available science.

- Collected and compiled Basin-wide data through September 2023 (Water Year [WY] 2023) pertaining to groundwater elevations, water quality, and land subsidence in the Basin Data Management System (DMS) to inform development of this GSP.
- Described the Basin's new governance structure, new information gathered, and recent outreach and coordination efforts in the Plan Area chapter (see **Section 5**).
- Incorporated significant new information into the Basin Setting and updated the HCM and Groundwater Conditions (GWC) assessments accordingly (see **Sections 7 and 8**).
- Evaluated current groundwater conditions relative to the revised MOs, MTs, and IMs (see **Section 8**).
- Developed Basin-wide current, historical, and projected water budgets using the Central Valley Hydrologic Model Version 2 (CVHM2; see **Section 9**).
- Estimated the long-term sustainable yield for each principal aquifer using the revised water budget approach (see **Section 9.5**).
- Revised the applicable SMCs at all RMS to incorporate new data and information and selected methodologies (see **Section 13**).
- Established SMCs at new RMS (see **Section 13**).
- Refined the Basin-wide monitoring network to include 35 additional Representative Monitoring Wells for Chronic Lowering of Groundwater Levels (RMW-WLs), 21 additional Representative Monitoring Wells for Degraded Groundwater Quality (RMW-WQs), and 19 additional Representative Monitoring Sites for Interconnected Surface Water (RMS-ISW) relative to the monitoring networks in the Revised 2022 GSPs, in addition to adding Interferometric Synthetic Aperture Radar (InSAR) coverage of the entire Basin as an RMS for Land Subsidence (see **Section 14**).
- Prepared updated descriptions of Projects and Management Actions (P/MAs) planning, implementation, and benefits (see **Section 15**).
- Conducted a quantitative assessment of how planned P/MAs will address overdraft conditions (see **Section 15.6**).
- Developed a Basin-wide PRP to be implemented by 2025 that outlines the measures the GSAs will take to achieve sustainability, including a 42,000 AFY pumping reduction by 2030 (**Section 16.1.1**).
- Developed a Basin-wide Well Mitigation Policy to address impacts to domestic and small community well owners associated with declining groundwater levels (**Section 16.1.7.2**)

2 SUSTAINABILITY GOAL

§ 354.24 Sustainability Goal

Each Agency shall establish in its Plan a sustainability goal for the basin that culminates in the absence of undesirable results within 20 years of the applicable statutory deadline. The Plan shall include a description of the sustainability goal, including information from the basin setting used to establish the sustainability goal, a discussion of the measures that will be implemented to ensure that the basin will be operated within its sustainable yield, and an explanation of how the sustainability goal is likely to be achieved within 20 years of Plan implementation and is likely to be maintained through the planning and implementation horizon.

23 CCR § 354.24

The Sustainability Goal adopted by all Groundwater Sustainability Agencies (GSAs) in the Delta-Mendota Subbasin (Basin), is as follows:

“The Delta-Mendota Subbasin will manage groundwater resources for the benefit of all users of groundwater in a manner that allows for operational flexibility, ensures resource availability under drought conditions, and does not negatively impact surface water diversion and conveyance and delivery capabilities. This goal will be achieved through the implementation of the proposed projects and management actions to reach identified measurable objectives and milestones through the implementation of the Groundwater Sustainability Plan(s) (GSP[s]), and through continued coordination with neighboring subbasins to ensure the absence of undesirable results by 2040.”

3 AGENCY INFORMATION

§ 354.6. When submitting an adopted Plan to the Department, the Agency shall include a copy of the information provided pursuant to Water Code Section 10723.8, with any updates, if necessary, along with the following information:

- (a) The name and mailing address of the Agency.
- (b) The organization and management structure of the Agency, identifying persons with management authority for implementation of the Plan.
- (c) The name and contact information, including the phone number, mailing address and electronic mail address, of the plan manager.
- (d) The legal authority of the Agency, with specific reference to citations setting forth the duties, powers, and responsibilities of the Agency, demonstrating that the Agency has the legal authority to implement the Plan.
- (e) An estimate of the cost of implementing the Plan and a general description of how the Agency plans to meet those costs.

3.1 Name and Mailing Address of the Agency

23 CCR § 354.6(a)

The Delta-Mendota Subbasin (herein referred to as the “Basin”) of the San Joaquin Valley Basin (California Department of Water Resources [DWR] Basin No. 5-022.07) is fully covered by 23 Groundwater Sustainability Agencies (GSAs), each acting as the exclusive GSA in their respective portion of the Basin.

The name and mailing addresses of the 23 GSAs covering the Basin are listed below.

Aliso Water District GSA

Aliso Water District
Groundwater Sustainability Agency
13991 Avenue 7
Madera, CA 93637

Central Delta-Mendota GSA

Central Delta-Mendota GSA
c/o Santa Nella County Water District
12931 S Hwy 33
Santa Nella, CA 95322

City of Dos Palos GSA

City of Dos Palos GSA
2174 Blossom Street
Dos Palos, CA 93620

City of Firebaugh GSA

City of Firebaugh GSA
1133 P Street
Firebaugh, CA 93622

City of Gustine GSA

City of Gustine GSA
352 Fifth Street, P.O. Box 16
Gustine, CA 95322

City of Los Banos GSA

City of Los Banos GSA
520 J Street
Los Banos, CA 93635

City of Mendota GSA

City of Mendota GSA
643 Quince Street
Mendota, CA 93640

City of Newman GSA

City of Newman GSA
938 Fresno Street
Newman, CA 95360

City of Patterson GSA

City of Patterson GSA
1 Plaza, P.O. Box 667
Patterson, CA 95363

County of Fresno GSA – Delta-Mendota Management Area A (MAA)

County of Fresno
Department of Public Works and Planning
Water and Natural Resources Division
2220 Tulare Street, 6th Floor
Fresno, CA 93721

County of Fresno GSA – Delta-Mendota Management Area B (MAB)

County of Fresno
Department of Public Works and Planning
Water and Natural Resources Division
2220 Tulare Street, 6th Floor
Fresno, CA 93721

County of Madera GSA – Delta-Mendota

County of Madera

200 W. Fourth Street
Madera, CA 93637

County of Merced GSA – Delta-Mendota

County of Merced
2222 M Street
Merced, CA 95340

DM-II GSA

DM-II GSA
P.O. Box 1596
Patterson, CA 95363

Farmers Water District GSA

Farmers Water District
4460 W. Shaw Avenue, #219
Fresno, CA 93720

Grassland GSA

Grassland Groundwater Sustainability Agency
200 W. Willmott Avenue
Los Banos, CA 93635

Northwestern Delta-Mendota GSA

Northwestern Delta-Mendota GSA
3800 Cornucopia Way, Suite C
Modesto, CA 95358

Oro Loma Water District GSA

Oro Loma Water District GSA
264 I Street
Los Banos, CA 93635

Patterson Irrigation District GSA

Patterson Irrigation District
P.O. Box 685
Patterson, CA 95363

San Joaquin River Exchange Contractors (SJREC) Water Authority GSA

San Joaquin River Exchange Contractors Water Authority
541 H Street, P.O. Box 2115
Los Banos, CA 93635

Turner Island Water District GSA – Delta-Mendota

Turner Island Water District
P.O. Box 2586
Los Banos, CA 93635

West Stanislaus Irrigation District GSA

West Stanislaus Irrigation District
P.O. Box 37
116 E St.
Westley, CA 95387

Widren Water District GSA

Widren Water District
259 I Street
Los Banos, CA 93635

Information regarding the GSAs and current GSA representatives can be found on the Basin’s Sustainable Groundwater Management Act (SGMA) website: <https://deltamendota.org/>

3.2 Organization and Management Structure of the Agency

23 CCR § 354.6(b)

On 12 December 2018, the Basin GSAs adopted and executed a Coordination Agreement and Cost Sharing Agreement to comply with the SGMA requirement that if a Basin is covered by multiple Groundwater Sustainability Plans (GSPs), GSAs must coordinate when developing and implementing their individual GSPs (Title 23 of the California Code of Regulations [23 CCR] § 357.4).

Because the Basin GSAs collectively decided to develop a single GSP for the Basin and a Coordination Agreement is no longer required by the SGMA statute, the Basin GSAs (Parties) signed and executed a Memorandum of Agreement (MOA) on 11 December 2023 (**Appendix D**), which will supersede the 2018 Coordination Agreement and Cost Sharing Agreement upon adoption of this GSP by the GSAs. The MOA reflects the GSAs’ commitment to adopt a single, coordinated, and streamlined GSP for the Basin in response to DWR’s Deficiency #1. The MOA updates the Basin governance structure with an emphasis on GSP implementation and defines seven groups of GSAs (the “GSA groups”) to guide management of separate portions of the Basin through a Coordination Committee. This structure continues to support localized knowledge and management of the Basin while striving for more coordinated sustainability goals, criteria, and objectives. Elements of the MOA are further described in **Section 5.5.5**.

The GSAs acknowledge that management of the Basin through 23 GSAs introduces complexity to the Basin’s organizational structure. However, the complexity of the organization structure mirrors the complexity of factors and conditions found within the Basin. The GSAs recognize a profound responsibility to local communities to uphold their representation in SGMA decision-making processes. Notably, a

majority of communities (including disadvantaged communities [DACs]) within the Basin are directly represented through their own GSA, which was a deliberate approach aimed to foster direct participation in SGMA matters. While this single GSP was prepared to streamline the Basin Plan, the GSAs have chosen to preserve the diversity and inclusion that exists within the 23 GSAs through the Basin’s organizational structure.

The GSA Groups and member agencies are listed below in **Table Intro-2** and shown in **Figure Intro-1**. Descriptions of individual GSA Groups are provided in **Section 5.1.2**.

Table Intro-2. GSA Groups and GSAs in the Delta-Mendota Subbasin

GSA Group	GSA Name	Member Agency
Aliso Water District	Aliso Water District GSA	Aliso Water District
Farmers Water District	Farmers Water District GSA	Farmers Water District
Fresno County	County of Fresno GSA - Delta-Mendota Management Area A	County of Fresno
	County of Fresno GSA - Delta-Mendota Management Area B	County of Fresno
Grassland	County of Merced GSA - Delta-Mendota	County of Merced
	Grassland GSA	Grassland Water District
		Grassland Resource Conservation District
Central Delta-Mendota	Central Delta-Mendota GSA	San Luis Water District
		Panoche Water District
		Tranquillity Irrigation District
		Fresno Slough Water District
		Eagle Field Water District
		Pacheco Water District
		Santa Nella County Water District
		Mercy Springs Water District
		County of Merced
		County of Fresno
	Oro Loma Water District GSA	Oro Loma Water District
	Widren Water District GSA	Widren Water District
Northern Delta-Mendota	City of Patterson GSA	City of Patterson
	DM-II GSA	Del Puerto Water District
		Oak Flat Water District
	Northwestern Delta-Mendota GSA	County of Merced
		County of Stanislaus
	Patterson Irrigation District GSA	Patterson Irrigation District
Twin Oaks Irrigation District		
West Stanislaus Irrigation District GSA	West Stanislaus Irrigation District	
San Joaquin River Exchange Contractors	City of Dos Palos GSA	City of Dos Palos
	City of Firebaugh GSA	City of Firebaugh

GSA Group	GSA Name	Member Agency
	County of Fresno GSA - Delta-Mendota Management Area B	County of Fresno
	City of Gustine GSA	City of Gustine
	City of Los Banos GSA	City of Los Banos
	City of Mendota GSA	City of Mendota
	City of Newman GSA	City of Newman
	County of Madera GSA - Delta-Mendota	County of Madera
	County of Merced GSA - Delta-Mendota	County of Merced
	San Joaquin River Exchange Contractors GSA	Central California Irrigation District
		Columbia Canal Company
		Firebaugh Canal Water District
Turner Island Water District GSA - Delta-Mendota	San Luis Canal Company	
	Turner Island Water District	

Abbreviations:

GSA = Groundwater Sustainability Agency

3.2.1 Coordination Committee

The MOA establishes a slightly revised Coordination Committee to provide a forum for the GSA Groups to work collaboratively and develop recommendations for technical and substantive Basin-wide activities. The Coordination Committee operates in full compliance with the Brown Act and is composed of a Chairperson and Vice Chairperson, Secretary, Plan Manager, and at least one GSA Group Representative and Alternate Representative for each of the seven GSA Groups. The Chairperson and Vice Chairperson are rotated annually among GSA Groups in alphabetical order. The Secretary assumes primary responsibility for Brown Act compliance.

The Coordination Committee has seven voting members and is comprised of at least one Representative from each GSA Group. GSA Group Representatives are selected by each respective GSA Group at the discretion of the respective GSA Group, and such appointments are effective upon providing written notice to the Secretary and to each Group Contact. Each GSA Group Representative is entitled to one vote at the Coordination Committee. The Alternate Representative is authorized to vote in the absence of the GSA Group Representative. A unanimous vote of the Representatives present is required on most items upon which the Coordination Committee is authorized to act, with the exception of certain ministerial and administrative items.

The number of voting members for each GSA Group as defined in the MOA are listed below:

- (1) Aliso Water District GSA Group
- (1) Central Delta-Mendota GSA Group
- (1) Farmers Water District GSA Group
- (1) Fresno County GSA Group
- (1) Grassland GSA Group

- (1) Northern Delta-Mendota GSA Group
- (1) SJREC GSA Group

Voting procedures to address a lack of unanimity take place upon a majority vote of a quorum of the Coordination Committee and include straw polls, provisional voting, and delay of voting. Where the law or the MOA require separate written approval by each of the Parties, such approval is evidenced in writing by providing the resolution, motion, or minutes of their respective Board of Directors to the Secretary of the Coordination Committee. Minutes of the Coordination Committee are kept and prepared by the Secretary or the Secretary's appointee and maintained by the Secretary as Coordination Agreement records and are available to the Parties and the public upon request. Meeting agendas are posted on the Delta-Mendota website (www.deltamendota.org).

The Coordination Committee will continue to meet and confer on GSP implementation as the Parties to the MOA deem necessary. The focus of the meetings will be to review data and other Plan implementation actions that will ensure the GSAs are progressing toward the Basin sustainability goal, while meeting the Annual Reporting requirements and any other requirements agreed upon for purposes of coordination.

Coordination Committee meetings are open to the public and include opportunities for public comment. Meetings are typically held on the second Monday of each month at 1:00 pm in the San Luis & Delta Mendota Water Authority (SLDMWA) Boardroom, 842 6th Street, Los Banos, CA.

3.2.1.1 Ad-Hoc Subcommittees

The Coordination Committee may appoint ad-hoc subcommittees, working groups, and otherwise direct staff made available by the Parties. Subcommittees or working groups may include qualified individuals possessing the knowledge and expertise on the topics being addressed by the subcommittee or working group, whether or not such individuals are GSA Group Representatives. Tasks assigned to subcommittees, working groups, or staff made available by the Parties may include developing technical data, supporting information, and/or recommendations on specialized matters to the Coordination Committee. During development of this GSP, the Coordination Committee appointed several ad-hoc subcommittees for single purpose issues that were disbanded after that issue was resolved. Standing ad-hoc subcommittees include:

- **Basin Ad-hoc Technical Subcommittee:** The Basin Ad-hoc Technical Subcommittee provided input and recommendations to the Coordination Committee on technical issues during GSP development and implementation. The Basin Ad-hoc Technical Subcommittee was comprised of GSA representatives and technical staff who met at least monthly, and often more frequently during the development of this GSP. The Basin Ad-hoc Technical Subcommittee was charged with coordinating implementation of the required technical elements of the GSP (e.g., water budgets, monitoring networks) and providing recommendations to the Coordination Committee. The Coordination Committee took actions to provide direction to the Basin Ad-hoc Technical

Subcommittee and approve Basin Ad-hoc Technical Subcommittee recommendations and work products.

- **Communication Subcommittee:** The Communication Subcommittee supported the Basin public outreach efforts and recommended various outreach activities.
- **Budget Subcommittee:** The Budget Subcommittee reviewed and recommended proposed budgets for projects and other committees.

3.3 Plan Manager

23 CCR § 354.6(c)

The Plan Manager for this GSP is John Brodie, Water Resources Programs Manager for the SLDMWA. The contact information for Mr. Brodie is provided below.

John Brodie
Water Resources Programs Manager
San Luis & Delta-Mendota Water Authority
842 6th Street
Los Banos, CA 93635
Email: john.brodie@sldmwa.org
Office Phone: (209) 826-1872

3.4 Legal Authority of the GSA

23 CCR § 354.6(d)

All 23 GSAs covering the Basin applied for and were granted exclusive GSA status under California Water Code (CWC) § 10723(c).

3.5 Estimated Cost of Implementing the GSP and the Agency's Approach to Meet Costs

23 CCR § 354.6(e)

Information on estimated costs to implement this GSP and the plan to meet those costs is provided in **Section 16.2**.


4 GSP ORGANIZATION

This Groundwater Sustainability Plan (GSP) is organized as follows:

- Sections 1 through 4 comprise the Introduction, including the following sections:
 - Section 1. Purpose of the Groundwater Sustainability Plan
 - Section 2. Sustainability Goal
 - Section 3. Agency Information
 - Section 4. GSP Organization
- Section 5 provides a Description of the Plan Area.
- Sections 6 through 10 present the Basin Setting, including the following sections:
 - Section 6. Introduction to Basin Setting
 - Section 7. Hydrogeologic Conceptual Model
 - Section 8. Current and Historical Groundwater Conditions
 - Section 9. Water Budget Information
 - Section 10. Management Areas
- Sections 1111 through 1313 present the Sustainable Management Criteria, including the following sections:
 - Section 11. Introduction to Sustainable Management Criteria
 - Section 12. Sustainability Goal
 - Section 13. Sustainability Indicators
- Section 14 presents the Monitoring Network.
- Section 15 presents the Projects and Management Actions.
- Section 16 presents the Plan Implementation.
- References and Technical Studies are included at the end of this document.
- Supporting information is provided in appendices as follows:
 - Appendix A. GSP Submittal Checklist
 - Appendix B. DWR Determination Letters
 - Appendix C. Board Resolutions to Adopt the Delta-Mendota Subbasin Groundwater Sustainability Plan, dated XX
 - Appendix D. Memorandum of Agreement Among the Delta-Mendota Subbasin Groundwater Sustainability Agencies
 - Appendix E. Public Outreach and Communications Log

- Appendix F. Delta-Mendota Subbasin Communications Plan
- Appendix G. Comments Received on the GSP
- Appendix H. Modeling Memo
- Appendix I. Concentrations, Trends, and Correlations of Constituents of Concern
- Appendix J. Freshwater Species in the Basin
- Appendix K. Hydrographs for RMW-WLs
- Appendix L. Well Impact Analysis for All Production Wells
- Appendix M. Well Mitigation Policy

Legend

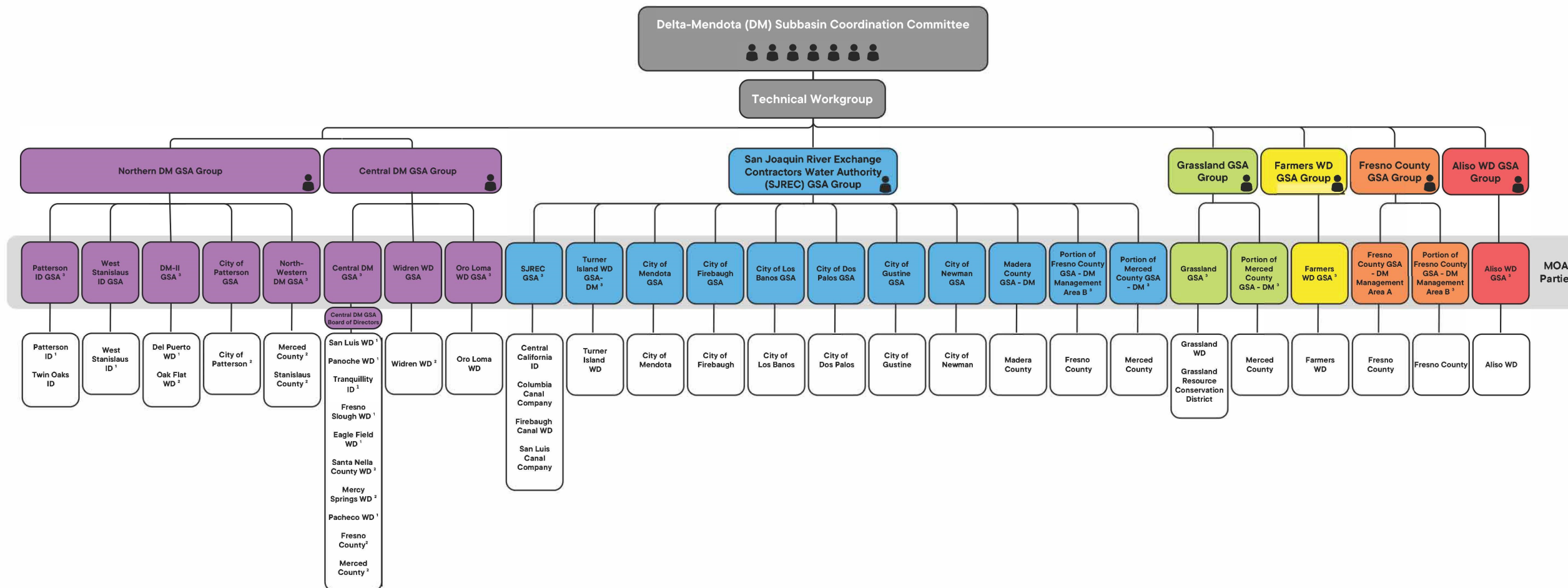
-  Delta-Mendota Subbasin Coordination Committee Voting Member

Abbreviations

- DM = Delta-Mendota
- ID = Irrigation District
- WD = Water District
- GSA = Groundwater Sustainability Agency
- SGMA = Sustainable Groundwater Management Act

Notes

1. Participation in North-Central Delta-Mendota Region GSP through Activity Agreement with the Authority
2. Participation in North-Central Delta-Mendota Region GSP through Memorandum of Agreement with the Authority
3. Technical Workgroup Member



Delta-Mendota Subbasin SGMA Governance Structure

DRAFT