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MEMORANDUM

TO: SLDMWA Board of Directors, Alternates

FROM: John Brodie, Water Resources Programs Manager
Chris Linneman, Regional Drainage Coordinator
Orvil McKinnis, Westside Watershed Coalition Coordinator

DATE: July 11, 2024

RE: Activity Agreements – Staff Report for June, 2024

This memorandum serves as the Staff Report for June 2024 regarding specified[1] Water Authority activities not separately addressed on the Board meeting agenda.

1. Integrated Regional Water Management (IRWM) Activity Summary

General Westside-San Joaquin Integrated Regional Water Management Plan (IRWMP)

Self Help Enterprises (SHE) continues its work to update Community Water Needs Assessments for disadvantaged communities (DACs) in the Westside San Joaquin IRWM Region. A first draft of the assessment update that will be presented to community members is expected sometime in August. The document will be used to identify and prioritize the most critical drinking water needs for DACs in the region, especially during drought years.

An Amendment to the Agreement for the Proposition 1 Round 1 IRWM Implementation Grant for the Westside San Joaquin IRWM Region was submitted in June. Time extensions are needed for the IRWM grant-funded portions for two of the five projects. Local Project Sponsors have requested the Agreement be extended to September 30, 2025 with no funds requested after the end of calendar year 2025.

The IRWM Roundtable of Regions (ROR) has completed an internal draft of a transition plan for the future of the association. The group is attempting to move IRWM forward without having DWR identify specific IRWM tasks or funding for the immediate future. The draft transition plan is expected to be released to the regions in July.

2. Sustainable Groundwater Management Activity (SGMA) Activity Summary

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[1] For the sake of completeness, this includes those Activity Agreements that have been approved by the Board of Directors, but not yet signed by all interested members and/or participants (i.e., the Los Vaqueros Expansion Project Activity Agreement, the Exchange Contractors 2019-2023 Transfer Program Activity Agreement, and the Westside-San Joaquin Integrated Regional Water Management Activity Agreement).

General SGMA Activities

Limited public comments were received on the draft single Groundwater Sustainability Plan (GSP) for the Delta-Mendota Subbasin. Several public outreach efforts on the draft were conducted including two webinars and a public meeting. Groundwater Sustainability Agency (GSA) representatives continue to meet with State Water Resources Control Board (SWRCB) staff to address identified priorities, including a well mitigation policy. SWRCB staff wants to see a funding mechanism in place adequate enough to meet the responsibility of repairing or replacing wells if it becomes necessary due to groundwater management in the Subbasin. GSAs are working on a framework to meet the staff's undefined threshold.

The fate of the drafted single GSP will be determined by the SWRCB based on SGMA legislation. The original six plans were first deemed "incomplete" and then "inadequate" by the Department of Water Resources. The "inadequate determination triggered SWRCB oversight. The Delta-Mendota Subbasin is one of six critically overdrafted subbasins in the San Joaquin valley facing a probationary designation by the SWRCB. The Tulare Lake Subbasin has already been placed on probation, the Tule Subbasin faces a September probationary hearing, and the Kaweah Subbasin hearing is scheduled for January. A probationary hearing for the Delta-Mendota Subbasin is tentatively scheduled for the first quarter of 2025.

Coordinated Activities

GSAs are collecting water quality data as a part of SGMA requirements. Per the draft single GSP, water quality data must now be collected twice annually. The new monitoring regime also calls for testing of additional water quality constituents based on SWRCB staff guidance.

GSA representatives are working with some valley-wide efforts the address both water supply reliability and water quality. The Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) is updating its archetype study of San Joaquin Valley basins. The Delta-Mendota Subbasin is first on the list of Priority 2 groundwater basins. Study team consultants have requested significant data from the GSAs to assist with the CV-SALTS effort.

The Technical Committee of the Water Blueprint for the San Joaquin Valley is also reaching out to Delta-Mendota Subbasin GSAs. The Committee seeks a better understanding of water supply needs based on the draft single GSP and overall SGMA compliance challenges. It is anticipated that information from the GSAs will be included in the Unified Water Plan.

3. Drainage Activity Summary

Grassland Basin Drainage Management Steering Committee Activity Summary
The Grassland Bypass Channel gates have remained closed since February 28. Selenium concentrations in Mud Slough and the San Joaquin River remain below the water quality objective.

95

GBP Activities

- General administration: Review and approve consultant billing. Field review of drainage conditions and correspondence with SJRIP manager. The 2023 Annual Monitoring Report was received and accepted by the Regional Board.
- Mud Slough Restoration Project: The intent of this project is to restore Mud Slough in accordance with the 2010 MOU between the Authority and California Department of Fish and Wildlife (CDFW). The Water Authority adopted the CEQA for the project in December 2021, which was not challenged. GBP management staff had a meeting with CDFW on August 15th during which CDFW committed to providing a revised MOU that would outline the specific tasks required to complete restoration of Mud Slough. A letter from CDFW regarding the MOU status was received the last week of January and we have requested a follow up meeting with CDFW to discuss alternatives.
- Compliance Monitoring: Monitoring in compliance with the 2019 revised WDRs and 2019 Use Agreement is a continuous and daily effort. Regular flow, water quality and toxicity monitoring are required at eight locations at a frequency that varies from monthly to daily. Fish tissue samples were collected in April and the results are expected soon.
- Grassland Drainage Area Coalition: Work continues to provide coverage for farmers within the Grassland Drainage Area for the Irrigated Lands Regulatory Program. Farm evaluation surveys will be sent out to farmers in 2024.
- Proposition 84 Grant: Work is ongoing to support the Prop 84 Grant administered by Panoche Drainage District for improvements to the San Joaquin River Improvement Project. The Short-Term Storage Basins construction is in progress and should be completed within the next 4 months. Other projects are in design phase.

San Joaquin Valley Drainage Authority Activity Summary

- Participated in conference calls with the Regional Board to respond to questions on surface water quality management plans and required follow up. Working with the Regional Board to formulate a more efficient focused outreach program to address sediment and surface water quality impacts to receiving waters.
- Westside San Joaquin River Watershed Coalition: Work continues to provide coverage under the Irrigated Lands Regulatory Program for farmers within the Westside San Joaquin River Watershed Coalition. The work includes managing the monitoring program, assisting farmers with the necessary reporting to comply with the program and preparing reports for the Regional Board. Analyze pyrethroid Focused Outreach data for follow up MPIRs. Respond to Regional Board's comments of annual monitoring report.
- Groundwater Protection Formula, Values and Targets: Coalitions have developed a methodology to establish nitrogen loading Values and Targets as required by the WDRs. Collaborating with other Coalitions to help formulate a set of questions that an Expert Panel convened by the SWRCB will need to answer concerning nitrate targets.
- Management Practices Effectiveness Program: Attend conference call meetings of the MPEP group. Developing work schedules to implement nitrogen control measures for farmer member compliance. Acceptable Ranges 6-Year report was presented to Regional Board in May 2024 and the Coalition is awaiting their comments.

- Central Valley Groundwater Monitoring Collaborative: Attend conference call meetings to give direction to program. Work with other coalitions and staff to coordinate and collaborate with SGMA efforts regarding groundwater quality monitoring and reporting.
- Management Zones: Work continued to develop plan for compliance within the Westside Coalition. Attend meetings with other Management Zone dischargers to begin formation of official Management Zone. Continue to negotiate with Dairy group to determine percentage of cost share. Attend Central Valley Salinity Coalition meetings to inform SJVDA regarding Management Zone formation.
- Salt Control Program: Phase I of the Salt Control Program involves the development of a Prioritization and Optimization Study (P&O Study). The Delta Mendota subwatershed was chosen as the Archetype to develop salt targets for the other areas of the P&O Study. Collaborate with Consultants to provide local water quality and supply data through District Managers. This work is being supported through the SJVDA budget.
- Prop 84 Real Time Program Grant: Work continues on maintaining the stations, gathering monitoring data, and computer modeling to determine and manage salt discharges to the San Joaquin River. The project has been extended to December of 2024 and the remaining funds will be used for the purchase of spare monitoring equipment.

3

CALIFORNIA
FARM WATER
COALITION

6133 Freeport Boulevard, FL2
Sacramento, CA 95822-3534
(916) 391-5030 FAX (916) 391-5044

TO: San Luis & Delta-Mendota Water Authority Board of Directors
FROM: Mike Wade, Executive Director
DATE: July 8, 2024
RE: Program and Activities Update

Public Outreach and Education

CFWC is beginning work on a new messaging program that focuses on common water supply issues throughout California's Great Central Valley. From dismal Sacramento Valley water supplies in 2022 to 50% allocations south of the Delta this year, the impact that inflexible regulations are having on California farmers is extraordinary. A focused, educational approach on the causes and potential solutions to perennial water supply shortages is aimed at reaching consumers, elected officials, public agency boards, and the media with specific information for each audience.

BizFed Conference – Los Angeles

I spoke on a panel at the Southern California Business Federation (BizFed) conference on June 26 on Los Angeles. The title for the panel was "Water Resiliency Forum: Water as an Economic Engine". Others included on the panel were SLDMWA Vice-Chair William Bourdeau and Nina Hawk, Chief of Bay-Delta Resources and Group Manager of Bay-Delta Initiatives for the Metropolitan Water District of Southern California.

The panel was designed to bring different perspectives on some of the challenges faced by agricultural water managers and how agricultural and urban partnerships can work to improve water supply reliability and the economics tied to rural industries. I led off with an overview of the size and scope of California's agricultural industry and delved into the problems consumers face with an increasing reliance on foreign-produced food supplies. Our dependence on foreign-produced food products is growing. Since 1980, fresh fruit imports have doubled, and fresh vegetable imports have quadrupled. Our dependence on producers in other countries reflects a growing risk to disruptions, production failures, plus pesticide use and labor practices that don't meet California standards.

The key to agriculture's success in California is providing the resources farmers need to stay productive and keep farmland producing food. That includes updating policies that give agencies like the Bureau of Reclamation more flexibility managing Delta exports in years like 2024 to avoid future 40% - 50% or lower allocations.

William Bourdeau discussed groundwater recharge as well as the barriers farmers face getting into farming. He pointed out the positive aspects of the newly signed MOU with Metropolitan Water District of Southern California to begin discussions on mutually beneficial water management practices in the San Joaquin Valley.

MWD's Nina Hawk provided background on a long-term collaboration MWD has engaged in with agricultural agencies and tribes along the Colorado River to conserve water, including how MWD pays farmers to conserve water through programs such as land fallowing and crop rotation.

CFWC Highway Signs

New highway banners have been delivered to Stone Land Company and Arvin-Edison Water Storage District. CFWC offers both the traditional green and white, "Food Grows Where Water Flows" banners as well as full color versions with a variety of different slogans in support of dairy, nuts, cotton, fresh fruits, and fresh vegetables. CFWC will provide banners at no charge to members willing to place them in prominent locations. Contact the CFWC office at (916) 391-5030 for additional information on different options for obtaining a banner.

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SAN JOAQUIN VALLEY DRAINAGE AUTHORITY
Regular Meeting of the Board of Directors

842 Sixth Street, Los Banos, California
Tuesday, July 2, 2024
9:30 a.m.

AGENDA

NOTE: Any member of the public may address the Board concerning any item on the agenda before or during consideration of that item. Board Directors/Alternates may discuss items listed on the agenda or add to the agenda as necessary, in accordance with Government Code section 54954.2, subd. (b)(2).

1. Call to Order/Roll Call

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

3. Opportunity for Public Comment – Any member of the public may address the Board concerning any matter not on the agenda, but within the Board's jurisdiction. Public comment is limited to no more than three minutes per person. For good cause, the Chair of the Board may waive this limitation.

Action Items

4. **Board to Consider Approval of Minutes/Acceptance of Listed Financial Reports**

   A. **Board to Consider Approving April 2, 2024 Meeting Minutes**
   B. **Board to Review and Consider Acceptance of Financial & Expenditure Report for Period Ending May 31, 2024**
   C. **Board to Review and Consider Acceptance of Treasurer's Report for the Quarter Ending March 31, 2024**

5. **Board to Consider Approval of Final Fiscal Year 2023 Audited Financial Statements**

Report Items

6. Regional Water Quality Management Activity
   A. Westside Watershed Coalition Update
      1) Update Crop-Year 2023 Reporting Deadlines
      2) Management Practice Evaluation Program Status
      3) Review Monitoring/Reporting Status
      4) Management Plan Updates and Outreach Activities
      5) Groundwater Protection Values

7. Update on Grant Programs
   A. Update of Salt and Boron TMDL Real Time Management Program
   B. Update on CV-SALTS
      1) Nitrate: Management Zone
      2) Salts: P&O Study Archetype

8. Other Updates Regarding Regulatory Processes, Legislation and Drainage Programs

9. Member Reports

10. Agency Representative Reports

11. Reports on Other Items Pursuant to Government Code Section 54954.2

Closed Session

12. Conference with Legal Counsel

    Pending Litigation Pursuant to Subdivision (a) of Government Code Section 54956.9

13. Return to Open Session/Report from Closed Session

14. ADJOURNMENT

Persons with a disability may request disability-related modification or accommodation by contacting Cheri Worthy at the San Luis & Delta-Mendota Water Authority Office by telephone (209) 826-9696 or email at cheri.worthy@sldmwa.org at least (3 for regular, 1 for special) day(s) before the meeting date.

SUMMERS ENGINEERING
887 N. Irwin St. – PO Box 1122
Hanford, CA 93232
(559) 582-9237 FAX (559) 582-7632

MEMORANDUM

TO: SJVDA Board of Directors

FROM: Orvil McKinnis, Watershed Coordinator

DATE: June 19, 2024

SUBJECT: Elevated Response Needed for Missed June 4, 2024 Focused Outreach Meeting

On 6/4/2024, the Coalition conducted a Focused Outreach meeting for Sediment toxicity and Pyrethroid exceedances for portions of the Marshall Road Drain and Del Puerto Creek subwatersheds. A notification, along with a set of forms to be completed by the grower, was sent May 16, 2024. The notification requested a RSVP response from the grower. Of the 10 growers who were asked to attend the meeting only 3 actually attended, with 1 grower sending an email the day of the meeting to acknowledge that they let the meeting day slip.

This meeting was convened in response to the Regional's Board insistence that the Coalition be more proactively engaged in addressing pyrethroid exceedances. The Marshall Road and Del Puerto Creek subwatersheds have persistent Sediment Toxicity and Pyrethroid exceedance issues and were prime candidates for the extra Focused Outreach. A secondary consideration was that recent reports of sediment plumes in a common supply/drain ditch were made to the Coalition. Given the above considerations, the Coalition decided to hold the Focused Outreach meeting in those subwatersheds. It should be noted that Coalition membership is tied to member growers providing the requested paperwork and attending the required meetings as stipulated in the General Order.

The Regional Board has also insisted that the Coalition provide them with a higher level of reporting of growers who do not attend the Focused Outreach meetings and/or do not complete the Management Practices Implementation Report forms, i.e., through quarterly ZOOM meetings between the Regional Board and the Coalition already being conducted. The Coalition requests that the SJVDA Board of Directors provide some guidance on further steps to meet the Regional Board's reporting requirement. Although this Memo addresses the Marshall Road and Del Puerto Creek subwatersheds, the lack of participation and missing paperwork is a chronic problem Coalition-wide. Whatever guidance the Board of Directors provide will become the standard response going forward.

The following is one suggested course of action for the Board of Directors to consider:

- If a reasonable effort (email or phone call) to collect the completed form and attend a make-up meeting (video presentation?) proves unsuccessful the Coalition will prepare

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 4/1/2024 to 4/30/2024

San Joaquin River at PID Pumps

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	1971.00	=	cfs	None
Total Dissolved Solids	W	204	4/9/2024	568	=	mg/L	> 450

SJR @ Sack Dam

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	269.00	=	cfs	None

Westley Wasteway near Cox Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	18.00	=	cfs	None
SpecificConductivity	W	204	4/9/2024	1170	=	uS/cm	> 900
Total Dissolved Solids	W	204	4/9/2024	1090	=	mg/L	> 450

WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

DNQ = Detected, Not Quantifiable

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 4/1/2024 to 4/30/2024

Mud Slough Upstream of San Luis Drain

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	204	4/9/2024	1800	=	ug/L	> 800
Discharge	W	204	4/9/2024		NR	cfs	None
SpecificConductivity	W	204	4/9/2024	2070	=	uS/cm	> 900
Total Dissolved Solids	W	204	4/9/2024	1420	=	mg/L	> 450

Newman Wasteway near Hills Ferry Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	204	4/9/2024	1120	=	ug/L	> 800
Discharge	W	204	4/9/2024		NR	cfs	None
SpecificConductivity	W	204	4/9/2024	1731	=	uS/cm	> 900
Total Dissolved Solids	W	204	4/9/2024	1450	=	mg/L	> 450

Orestimba Creek at Farm Bridge

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	35.00	=	cfs	None

Poso Slough at Indiana Ave

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	7.80	=	cfs	None
E. coli	W	204	4/9/2024	1203.3	=	MPN/100 mL	> 235

Salt Slough @ Lander Avenue

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	204	4/9/2024	867	=	ug/L	> 800
Discharge	W	204	4/9/2024	202.00	=	cfs	None
SpecificConductivity	W	204	4/9/2024	1334	=	uS/cm	> 900
Total Dissolved Solids	W	204	4/9/2024	916	=	mg/L	> 450

Salt Slough at Sand Dam

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	15.00	=	cfs	None
Total Dissolved Solids	W	204	4/9/2024	519	=	mg/L	> 450

San Joaquin River at Lander Avenue

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	456.00	=	cfs	None

WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

DNQ = Detected, Not Quantifiable

4/3

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 4/1/2024 to 4/30/2024

Ingram Creek at River Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Bifenthrin	W	204	4/9/2024	0.0019	=	ug/L	> 1, CGU= 2
Cyhalothrin, Total lambda-	W	204	4/9/2024	0.0006	=	ug/L	> 1, CGU= 2
Discharge	W	204	4/9/2024	27.00	=	cfs	None
Dissolved Organic Carbon	W	204	4/9/2024	5.2	=	mg/L	None
E. coli	W	204	4/9/2024	1046.2	=	MPN/100 mL	> 235
Permethrin, Total	W	204	4/9/2024	0.0022	DNQ	ug/L	> 1, CGU= 2
Total Dissolved Solids	W	204	4/9/2024	719	=	mg/L	> 450
Total Organic Carbon	W	204	4/9/2024	5.3	=	mg/L	None

Los Banos Creek @ Hwy 140

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	204	4/9/2024	2070	=	ug/L	> 800
Discharge	W	204	4/9/2024		NR	cfs	None
E. coli	W	204	4/9/2024	2419.6	>	MPN/100 mL	> 235
SpecificConductivity	W	204	4/9/2024	2226	=	uS/cm	> 900
Total Dissolved Solids	W	204	4/9/2024	1530	=	mg/L	> 450

Los Banos Creek at China Camp Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	204	4/9/2024	1680	=	ug/L	> 800
Discharge	W	204	4/9/2024		NR	cfs	None
E. coli	W	204	4/9/2024	2419.6	=	MPN/100 mL	> 235
SpecificConductivity	W	204	4/9/2024	1954	=	uS/cm	> 900
Total Dissolved Solids	W	204	4/9/2024	1350	=	mg/L	> 450

Marshall Road Drain near River Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Bifenthrin	W	204	4/9/2024	0.0021	=	ug/L	> 1, CGU= 2
Cyhalothrin, Total lambda-	W	204	4/9/2024	0.0003	DNQ	ug/L	> 1, CGU= 2
Discharge	W	204	4/9/2024	13.50	=	cfs	None
Dissolved Organic Carbon	W	204	4/9/2024	6.5	=	mg/L	None
Total Dissolved Solids	W	204	4/9/2024	549	=	mg/L	> 450
Total Organic Carbon	W	204	4/9/2024	5.7	=	mg/L	None

WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

DNQ = Detected, Not Quantifiable

44

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 4/1/2024 to 4/30/2024

Blewett Drain at Highway 132

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Bifenthrin	W	204	4/9/2024	0.010	=	ug/L	> 1, CGU= 6
Copper	W	204	4/9/2024	10	=	ug/L	> 7.9
Cyhalothrin, Total lambda-	W	204	4/9/2024	0.0004	DNQ	ug/L	> 1, CGU= 6
Discharge	W	204	4/9/2024	0.50	=	cfs	None
Dissolved Organic Carbon	W	204	4/9/2024	8.7	=	mg/L	None
Total Organic Carbon	W	204	4/9/2024	8.5	=	mg/L	None

Del Puerto Creek at Highway 33

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	40.50	=	cfs	None
Total Dissolved Solids	W	204	4/9/2024	625	=	mg/L	> 450

Del Puerto Creek near Cox Road (WSJRWC)

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	27.00	=	cfs	None
E. coli	W	204	4/9/2024	248.9	=	MPN/100 mL	> 235
Total Dissolved Solids	W	204	4/9/2024	603	=	mg/L	> 450

Delta Mendota Canal at DPWD

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	204	4/9/2024	900.00	=	cfs	None

Hospital Creek at River Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Bifenthrin	W	204	4/9/2024	0.0022	=	ug/L	> 1, CGU= 2
Cyhalothrin, Total lambda-	W	204	4/9/2024	0.0009	=	ug/L	> 1, CGU= 2
Discharge	W	204	4/9/2024	9.00	=	cfs	None
Dissolved Organic Carbon	W	204	4/9/2024	6.3	=	mg/L	None
Total Dissolved Solids	W	204	4/9/2024	740	=	mg/L	> 450
Total Organic Carbon	W	204	4/9/2024	6.4	=	mg/L	None

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45

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 3/1/2024 to 3/30/2024

Westley Wasteway near Cox Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/11/2024	0.00	=	cfs	None
Ammonia as N	W	203	3/12/2024	2.2	=	mg/L	> 0.57 Or > 1.5
Discharge	W	203	3/12/2024	4.50	=	cfs	None
E. coli	W	203	3/12/2024	365.4	=	MPN/100 mL	> 235
pH	W	203	3/12/2024	8.97	=	none	< 6.5 Or > 8.5
SpecificConductivity	W	203	3/12/2024	997	=	uS/cm	> 900

WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

DNQ = Detected, Not Quantifiable

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 3/1/2024 to 3/30/2024

Poso Slough at Indiana Ave

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Bifenthrin	W	203	3/12/2024	0.0018	=	ug/L	> 1, CGU= 2
Discharge	W	203	3/12/2024	17.50	=	cfs	None
Dissolved Organic Carbon	W	203	3/12/2024	6.3	=	mg/L	None
Total Organic Carbon	W	203	3/12/2024	6.2	=	mg/L	None

Salt Slough @ Lander Avenue

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	203	3/12/2024	958	=	ug/L	> 800
Discharge	W	203	3/12/2024	228.00	=	cfs	None
SpecificConductivity	W	203	3/12/2024	1521	=	uS/cm	> 900

Salt Slough at Sand Dam

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/12/2024	13.00	=	cfs	None
Hyalella azteca	S	203	3/12/2024	64	=	%	Fail and < 80 PctControl
SpecificConductivity	W	203	3/12/2024	937	=	uS/cm	> 900

San Joaquin River at Lander Avenue

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/12/2024	435.00	=	cfs	None

San Joaquin River at PID Pumps

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/12/2024	2804.00	=	cfs	None
pH	W	203	3/12/2024	9.66	=	none	< 6.5 Or > 8.5

SJR @ Sack Dam

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/12/2024	261.00	=	cfs	None
Oxygen, Dissolved	W	203	3/12/2024	0.2	=	mg/L	< 5

WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

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47

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 3/1/2024 to 3/30/2024

Ingram Creek at River Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/11/2024	0	=	cfs	None
Hyalella azteca	S	203	3/11/2024	10	=	%	Fail and < 80 PctControl
pH	W	203	3/11/2024	9.34	=	none	< 6.5 Or > 8.5

Los Banos Creek @ Hwy 140

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	203	3/12/2024	1920	=	ug/L	> 800
Discharge	W	203	3/12/2024		NR	cfs	None
E. coli	W	203	3/12/2024	344.8	=	MPN/100 mL	> 235
SpecificConductivity	W	203	3/12/2024	1936	=	uS/cm	> 900

Los Banos Creek at China Camp Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/12/2024	0.55	=	cfs	None
E. coli	W	203	3/12/2024	290.9	=	MPN/100 mL	> 235
Oxygen, Dissolved	W	203	3/12/2024	3.08	=	mg/L	< 5

Mud Slough Upstream of San Luis Drain

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	203	3/12/2024	1550	=	ug/L	> 800
Discharge	W	203	3/12/2024	0.55	=	cfs	None
SpecificConductivity	W	203	3/12/2024	1612	=	uS/cm	> 900

Newman Wasteway near Hills Ferry Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	203	3/12/2024	902	=	ug/L	> 800
Discharge	W	203	3/12/2024	3.00	=	cfs	None
Oxygen, Dissolved	W	203	3/12/2024	2.0	=	mg/L	< 5
SpecificConductivity	W	203	3/12/2024	1715	=	uS/cm	> 900

Orestimba Creek at Farm Bridge

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/11/2024	144.00	=	cfs	None
pH	W	203	3/11/2024	9.59	=	none	< 6.5 Or > 8.5
Discharge	W	203	3/12/2024	144.00	=	cfs	None
pH	W	203	3/12/2024	9.46	=	none	< 6.5 Or > 8.5

WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

DNQ = Detected, Not Quantifiable

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 3/1/2024 to 3/30/2024

Blewett Drain at Highway 132

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/11/2024	0.30	=	cfs	None
pH	W	203	3/11/2024	8.82	=	none	< 6.5 Or > 8.5
Discharge	W	203	3/12/2024	0.30	=	cfs	None
Oxygen, Dissolved	W	203	3/12/2024	4.95	=	mg/L	< 5
pH	W	203	3/12/2024	9.12	=	none	< 6.5 Or > 8.5

Del Puerto Creek at Highway 33

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/11/2024	40.50	=	cfs	None
pH	W	203	3/11/2024	9.75	=	none	< 6.5 Or > 8.5
Discharge	W	203	3/12/2024	54.00	=	cfs	None
E. coli	W	203	3/12/2024	344.8	=	MPN/100 mL	> 235
pH	W	203	3/12/2024	9.66	=	none	< 6.5 Or > 8.5

Del Puerto Creek near Cox Road (WSJRWC)

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/11/2024	40.50	=	cfs	None
pH	W	203	3/11/2024	9.89	=	none	< 6.5 Or > 8.5
Discharge	W	203	3/12/2024	46.80	=	cfs	None
E. coli	W	203	3/12/2024	648.8	=	MPN/100 mL	> 235
pH	W	203	3/12/2024	9.87	=	none	< 6.5 Or > 8.5

Delta Mendota Canal at DPWD

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/12/2024	900.00	=	cfs	None
pH	W	203	3/12/2024	9.23	=	none	< 6.5 Or > 8.5

Hospital Creek at River Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	203	3/11/2024	0	=	cfs	None
pH	W	203	3/11/2024	9.38	=	none	< 6.5 Or > 8.5

WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

DNQ = Detected, Not Quantifiable

49

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 2/1/2024 to 2/29/2024

Orestimba Creek at Farm Bridge

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	81.00	=	cfs	None
pH	W	202	2/13/2024	9.57	=	none	< 6.5 Or > 8.5

Poso Slough at Indiana Ave

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	7.50	=	cfs	None

Salt Slough @ Lander Avenue

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	202	2/13/2024	1020	=	ug/L	> 800
Discharge	W	202	2/13/2024	265.00	=	cfs	None
SpecificConductivity	W	202	2/13/2024	1650	=	uS/cm	> 900

Salt Slough at Sand Dam

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	7.00	=	cfs	None
E. coli	W	202	2/13/2024	755.6	=	MPN/100 mL	> 235
SpecificConductivity	W	202	2/13/2024	1202	=	uS/cm	> 900

San Joaquin River at Lander Avenue

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	774.00	=	cfs	None
E. coli	W	202	2/13/2024	398.6	=	MPN/100 mL	> 235

San Joaquin River at PID Pumps

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	3487.00	=	cfs	None
pH	W	202	2/13/2024	9.44	=	none	< 6.5 Or > 8.5

SJR @ Sack Dam

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	319.00	=	cfs	None

WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

DNQ = Detected, Not Quantifiable

Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 2/1/2024 to 2/29/2024

Blewett Drain at Highway 132

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	0.30	=	cfs	None
pH	W	202	2/13/2024	8.94	=	none	< 6.5 Or > 8.5

Del Puerto Creek at Highway 33

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	144.00	=	cfs	None
pH	W	202	2/13/2024	9.73	=	none	< 6.5 Or > 8.5

Del Puerto Creek near Cox Road (WSJRWC)

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	27.00	=	cfs	None
E. coli	W	202	2/13/2024	325.5	=	MPN/100 mL	> 235
pH	W	202	2/13/2024	9.89	=	none	< 6.5 Or > 8.5

Delta Mendota Canal at DPWD

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	900.00	=	cfs	None
pH	W	202	2/13/2024	9.31	=	none	< 6.5 Or > 8.5

Los Banos Creek @ Hwy 140

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Boron	W	202	2/13/2024	1380	=	ug/L	> 800
Discharge	W	202	2/13/2024		NR	cfs	None
SpecificConductivity	W	202	2/13/2024	1514	=	uS/cm	> 900

Los Banos Creek at China Camp Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Discharge	W	202	2/13/2024	3.00	=	cfs	None

Newman Wasteway near Hills Ferry Road

Analyte/Species	Matrix	Event	Sample Date	Result		Units	WQV
Ammonia as N	W	202	2/13/2024	3.7	=	mg/L	> 6.1 Or > 1.5
Discharge	W	202	2/13/2024	0.55	=	cfs	None
Oxygen, Dissolved	W	202	2/13/2024	2.2	=	mg/L	< 5

WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

DNQ = Detected, Not Quantifiable

IX C

Meeting of the Delta-Mendota Subbasin Coordination Committee
Monday June 10, 2024, 1:00 PM
AGENDA

Coordination Committee Members and Alternates Present
John Wiersma, Member – San Luis Canal Company (SLCC)/ San Joaquin River Exchange Contractors (SJREC)
Chase Hurley, Member – Pacheco Water District/ Central Delta-Mendota
Vince Lucchesi, Member – Patterson Irrigation District/ Northern Delta-Mendota Region
Christy McKinnon, Alternate – Stanislaus County/ Northern Delta-Mendota Region*
Jim Stilwell, Member – Farmers Water District
Augie Ramirez, Alternate – Fresno County
Ric Ortega, Member – Grassland Water District (Grassland)*
Joe Hopkins, Member – Aliso Water District (AWD)/ Provost & Pritchard (P&P)

San Luis & Delta-Mendota Water Authority (SLDMWA) Staff Present
John Brodie
Ray Tarka

Others Present
Steve Stadler – San Luis Water District
Adam Scheuber – Del Puerto Water District
Chuck Bergson – City of Los Banos
Ashlee Chan- Gonzalez – Merced County
Maria Encinas – City of Patterson
Jacinta Cabral – Merced County
Patrick McGowan – Panoche Drainage District*
Ellen Wehr – Grassland Water District*
Lauren Layne – Baker Manock & Jensen, PC (BMJ)*
Anona Dutton – EKI Environment & Water, Inc. (EKI)
Sarah Gerenday – EKI*
Susan Xie – EKI*
Amir Mani – EKI*
Will Halligan – Luhdorff & Scalmanini Consulting Engineers (LSCE)
Andrew Francis –LSCE*
Rick Iger – P&P*
Ethan Andrews – P&P*
Leslie Dumas – Woodard & Curran*
Natalie Cochran – Woodard & Curran*
Ryan Athey – Trihydro*
Brian Smith – Trihydro*
Margaret Caligaris – Trihydro*
Lisa Beutler – Stantec*
Kiti Campbell – Westlands Water District*
Hiroko Hort – GSI Environmental, Inc.*

* Denotes telephonic/Zoom participation.

92

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

   John Wiersma (SLCC/ SJREC) called the meeting to order at 1:00 PM.

2. **Pledge of Allegiance**

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

   No corrections or additions were made.

4. **Opportunity for Public Comment**

   No public comments were made.

Consent Calendar

5. **Committee to Review and Take Action on the Consent Calendar (Wiersma/Brodie)**

   a) **Minutes of the May 13, 2024 Meeting**
   b) **Coordination Committee Budget to Actual Report**

   Augie Ramirez (Fresno County) moved to approve the consent calendar items. John Wiersma seconded, and the motion passed unanimously.

Report Items

6. **Committee to Discuss Proposed Well Mitigation Policy Funding Mechanism, Brodie/Petersen/Tarka/Layne**

   Ray Tarka (SLDMWA) explained that creating an interest-bearing well mitigation fund would require amending the activity agreement and creating two new accounts. Chase Hurley (Pacheco Water District/ Central Delta-Mendota) and Ric Ortega (Grassland) suggested that one Groundwater Sustainability Agency (GSA) could hold the money instead of SLDMWA or that each GSA or group maintain their own funding; however, it was agreed that SLDMWA holding the funds would be the more effective option. John Brodie (SLDMWA) determine what needs to be done to receive approval from the SLDMWA board.

7. **Committee to Discuss Public Review Draft of Revised Groundwater Sustainability Plan (GSP)**

   a) **Review of Water Quality Chapter Comments from Legal Team and Incorporation, Brodie/Dutton/Layne**

      John Brodie shared that the email from Tess Dunham (Kahn, Soares & Conway, LLP) regarding her legal review of the water quality portions of the GSP was included in the packet. Anona Dutton (EKI) related that Dunham had recommended including more reference to the Basin Plan, setting Measurable Objectives (MO) equal to Minimum Thresholds (MT), and adjusting the hexavalent chromium MT in consideration of the new maximum contaminant level (MCL). Ellen Wehr (Grassland) agreed to follow up with the San Joaquin Valley Drainage Authority Dunham regarding regulatory responsibilities and overlap.

b) **Public Comments and Deadline, Brodie**

John Brodie informed the Committee that no comments on the GSP had been submitted as of Friday. Triangle T Water District had inquired whether their demand management program had been included in the Subbasin's projected water budget. Anona Dutton clarified that Triangle T's program had not been explicitly included, but that all of the surrounding subbasins had been assumed to achieve sustainability by 2040.

c) **Meeting with State Water Resources Control Board (SWRCB) Staff to Discuss Single GSP Draft June 20, 2024, Brodie/Dutton**

Anona Dutton shared that draft slides for the June 20th meeting with SWRCB staff were included in the meeting materials and requested suggestions on additional context that could be given for the Subbasin's GSP development. The Committee recommended including reference to the number of cities and disadvantaged communities, the large extent of wetlands in Grassland, the amount of surface water deliveries, and grants received. EKI agreed to revise the slides and send them to John Brodie to provide to the SWRCB staff.

d) **Review and Incorporation of Public and SWRCB Comments, Dutton**

Anona Dutton presented two potential timelines for incorporation of public and SWRCB comments and adoption of the GSP which varied by three months depending on the time SWRCB may take for review. The Committee agreed that it would most likely be better to adopt the GSP earlier rather than later and that the decision would be revisited in the July 8th Coordination Committee meeting. Dutton explained that the sufficiency of the remaining budget would depend on the level of effort required to address comments on the GSP, which could be discussed further in the July 8th meeting.

e) **Status of Memorandum of Agreement (MOA)/ Special Project Agreement (SPA) Adoption, Brodie**

John Brodie announced that all parties had signed the MOA and SPA except Oro Loma Water District and reminded the Committee that the agreement would become effective when the last GSA adopts the single GSP.

f) **Timeline for Coordination Committee Recommendation for Adoption, Brodie/Dutton**

This item was discussed under agenda item 7d.

g) **GSA Adoption, Brodie/Dutton/Layne**

This item was discussed under agenda item 7d.

h) **Submission to SWRCB/Department of Water Resources (DWR) Sustainable Groundwater Management Act (SGMA) Portal, Brodie**

The Committee discussed the logistics of submitting the single GSP to SWRCB and whether it should also be submitted to DWR. Lauren Layne recalled that SWRCB had indicated that they had resolved the question at least internally, and she recommended that the Subbasin representatives ask SWRCB staff in the June 20th meeting.

54

8. Committee to Discuss Outreach, Beutler/Brodie

    a) Review of June 7, 2024 Webinar on GSP Public Draft, Beutler/Brodie

    Lisa Beutler (Stantec) recounted that 36 people had attended the June 7th webinar. Beutler explained that reactions had been positive and that SWRCB had sent a note indicating that the webinar had gone well.

    b) June 18, 2024 Public Meeting on GSP Public Draft, Beutler/Brodie

    Lisa Beutler informed the Committee that the June 18th public meeting is scheduled in Los Banos from 4 to 6 PM and that DWR will provide Spanish translation services. Beutler requested that the GSAs help advertise and participate in the meeting. Stantec and EKI will provide fliers and Stantec will provide QR codes.

    c) Water Leadership Institute June 15, 2024 Graduation, Brodie

    John Brodie reminded the Committee that the Water Leadership Institute graduation is scheduled June 15th at the Bird Ranch and requested that a representative from the Subbasin attend.

    d) Community Water Needs Assessment, Brodie

    John Brodie informed the Committee that Self-Help Enterprise is working through a list of categories to discuss with disadvantaged and severely disadvantaged community leaders.

    e) Delta-Mendota Subbasin Newsletter, Brodie

    John Brodie shared that the Subbasin Newsletter was included in the meeting packet and will be distributed following the meeting.

9. Committee to Discuss GSP Implementation

    a) Basin-wide Pumping Reduction Framework Tasks for Completion by October 2024, Brodie/Dutton

    Anona Dutton reminded the Committee that GSA-specific policies under the Pumping Reduction Framework must be adopted by October. The Committee agreed that SWRCB should be informed when the policies are adopted.

    b) Three Month Look-ahead Schedule, Dutton

    Anona Dutton reminded the Committee that a public outreach meeting and a meeting with SWRCB will occur in June while public comments are being received. In July, the GSP will be finalized for adoption, and summer groundwater quality monitoring will commence. Finally, GSAs will be working to develop implementation policies until October.

    c) Review of Water Quality Lab Analyses Protocols, Brodie/Dumas

    A list of proposed analytical methods was included in the meeting packet. GSAs are advised to check with the laboratories they use for water quality analyses to confirm that the proposed methods are offered.

d) Reporting and Data Management, Brodie

John Brodie explained that the 2024 annual report would be part of the next fiscal year's budget. It was noted that upgrades would be needed to the Data Management System (DMS) and suggested that appendices specific to individual GSA groups not be included. Woodard & Curran agreed to determine what upgrades would be needed and what the cost would be.

e) Timeline and Budget Update, Dutton

This item was discussed under agenda items 7d and 9b.

10. Committee to Discuss Interbasin Coordination

a) Central Valley Salinity Alternatives for Long-Term Sustainability (CV SALTS) Delta-Mendota Subbasin Prioritization and Optimization Archetype Analysis, Ortega/Wehr/Brodie

Ric Ortega, Ellen Wehr, and John Brodie explained that Subbasin representatives had met with representatives from CV SALTS regarding the model being constructed for the Delta-Mendota Subbasin Prioritization and Optimization Archetype Analysis. The Committee agreed that data should be shared with CV SALTS under a confidentiality agreement and that Subbasin representatives should request that the release of the CV SALTS model be delayed so as not to create a potential conflict with the Subbasin's numerical model at the time that SWRCB reviews the single GSP.

b) Unified Water Plan Meeting 6/7/2024, Brodie

John Brodie informed the Committee that he had discussed projects with the Unified Water Plan architects and that they were revising their numbers due to feedback from the Subbasin. Brodie noted that GSAs may be asked to provide information on the prioritization of projects.

11. Committee to Discuss SGMA Round 1 Grant Timeline, Dumas

John Brodie and Natalie Cochran (Woodard & Curran) announced that there had been a meeting with DWR regarding possible extension of the Round 1 grant. They explained that DWR may agree to a six-month extension and that by August it would probably be determined whether the grant could be extended up to a year. Cochran indicated that Kelly List would ask the GSAs for information regarding their needs for an extension.

a) Interconnected Surface Water (ISW) Well Construction Management, Francis

Andrew Francis (LSCE) shared a map of potential locations for monitoring wells ISW-1 and ISW-3. Francis noted that Lower Aquifer representative monitoring well 213 River Rd is an irrigation well without screen information and suggested that if ISW-1 is constructed with a completion in the Lower Aquifer, it would make a good replacement. Adding a Lower Aquifer completion would cost approximately $25,000 more per well.

12. Committee to Review Monitoring Exceedances, Dumas/Dutton

Natalie Cochran informed the Committee that all of the spring water level data had been uploaded and that there were no MT exceedances. Cochran also noted that Woodard & Curran

was currently working with Houston Engineering to update the list of wells in the DMS to reflect the representative monitoring network of the single GSP and that the DMS would be ready in time for summer water quality monitoring.

13. **Committee to Discuss Available Funding Opportunities, Brodie**

    John Brodie referred to a list of available funding opportunities in the meeting packet but that the Rural Decentralized Water System Grant Program probably would not be a feasible option for 2024.

14. Next Steps

    - John Brodie will work with the SLDMWA staff to create a well mitigation policy fund and to amend the activity agreement.
    - John Brodie will inquire with the SWRCB staff regarding the specifics of GSP submission.
    - John Brodie will distribute the Subbasin newsletter to the Committee.
    - In September, the Committee will review progress towards the deadlines of the Pumping Reduction Plan.
    - Woodard & Curran will work with Houston Engineering to determine what updates to the DMS are necessary for preparing the annual report.
    - The Subbasin will pursue a confidentiality agreement with CV SALTS and request that they delay the release of their model.
    - GSAs will prepare to perform the summer water quality monitoring.
    - Lisa Beutler will distribute a flyer for the June 18th workshop to the Committee.

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

    No reports were made under this agenda item.

16. **Future Delta-Mendota Subbasin Coordination Committee Meetings**

    a) No Coordination Committee and Technical Working Group meeting will be held on Monday June 24, 2024.

    b) Monday July 8, 2024, 1:00 PM Grassland Water District.

17. ADJOURNMENT

    John Wiersma adjourned the meeting at 3:26 PM.

Special Meeting of the Delta-Mendota Subbasin Coordination Committee
and Technical Working Group
Monday June24, 2024, 1:00 PM DRAFT
San Luis & Delta Mendota Water Authority Boardroom, 842 Sixth St., Los Banos, CA 93635

Coordination Committee Members and Alternates Present
John Wiersma, Member – San Luis Canal Company (SLCC)/ San Joaquin River Exchange Contractors (SJREC)
Jarrett Martin, Member – Central California Irrigation District (CCID)/ SJREC
Christy McKinnon, Alternate – Stanislaus County/ Northern Delta-Mendota Region*
Jim Stilwell, Member – Farmers Water District*
Augie Ramirez, Alternate – Fresno County
Ric Ortega, Member – Grassland Water District (Grassland)*
Joe Hopkins, Member – Aliso Water District (AWD)/ Provost & Pritchard (P&P)*

San Luis & Delta-Mendota Water Authority (SLDMWA) Staff Present
John Brodie

Others Present
Ashlee Chan-Gonzalez – Merced County
Jacinta Cabral – Madera County
Tukta Phetasa – Madera County
Steve Stadler – San Luis Water District (SLWD)*
Adam Scheuber – Del Puerto Water District*
Ellen Wehr – Grassland Water District*
Patrick McGowan – Panoche Drainage District*
Lauren Layne – Baker Manock & Jensen, PC (BMJ)*
Anona Dutton – EKI Environment & Water, Inc. (EKI)
Sarah Gerenday – EKI*
Susan Xie – EKI*
Amir Mani – EKI*
Will Halligan – Luhdorff & Scalmanini Consulting Engineers (LSCE)*
Andrew Francis – LSCE*
Ethan Andrews – P&P*
Leslie Dumas – Woodard & Curran*
Natalie Cochran – Woodard & Curran*
Margaret Caligaris – Trihydro*
Dawn Carlton – Stantec*
Lauryl*
209-675-0924*
559-660-2048*
661-303-6607*

* Denotes telephonic/Zoom participation.

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

   John Wiersma (SLCC/ SJREC) called the meeting to order at 1:05 PM.

2. Opportunity for Public Comment

No public comments were made.

Report Items

3. Review of Public Meeting on Draft Single Groundwater Sustainability Plan (GSP) (6/18/24), Brodie

John Brodie (SLDMWA) reported that the public meeting had been successful. A summary was included in the meeting materials.

4. Review of Technical Meeting with State Water Resources Control Board (SWRCB) Staff (6/20/24), Brodie

The Committee discussed the June 20th meeting with SWRCB staff. John Brodie and Anona Dutton (EKI) explained that the most significant issues were the Undesirable Result definition for water quality, the well mitigation policy, overdraft elimination in the projected water budget, and the SWRCB staff's review of the 2022 GSPs.

a) Water Quality Sustainable Management Criteria

Anona Dutton explained that the SWRCB staff were still concerned that three years of water quality Minimum Threshold (MT) exceedances would be too long for establishing an Undesirable Result. The Committee ultimately agreed that the threshold for an Undesirable Result for water quality will be amended to MT exceedance in 15% of representative monitoring wells in three consecutive semiannual monitoring events as a result of groundwater recharge or extraction in the Subbasin.

b) Well Mitigation Policy

The Committee discussed the SWRCB staff's concerns regarding the well mitigation policy. SWRCB staff had expressed the desire for GSAs to mitigate water quality, provide a tanked water supply to be plumbed into a home within two days, and remove or substantially increase the cap on well replacement costs. Anona Dutton cautioned that while the Sustainable Groundwater Management Act (SGMA) does not require well mitigation or remediation of legacy water quality issues, SWRCB staff will likely recommend the Subbasin for probation if water quality were not included in the well mitigation policy.

The Committee agreed to provide bottled water within two days instead of ten and that provision of a plumbed, tanked water supply could be considered on a case-by-case basis. The Committee also agreed that to remove the language regarding a $30,000 per well spending cap. John Brodie agreed to contact drillers for additional well replacement estimates to provide context for the cost, and Lauren Layne (BMJ), Ellen Wehr, Ric Ortega (Grassland), and Augie Ramirez (Fresno County) agreed to revise the policy language.

c) GSPs Being Reviewed for Staff Report

Committee members expressed concern that SWRCB staff are currently preparing the draft staff report based upon the six inadequate GSPs submitted in 2022, despite knowing and encouraging the subbasin's intent to submit a revised single GSP for over a year. Anona Dutton advised that if the Subbasin GSP is finalized by the end of July 2024, then according to SWRCB's stated schedule and the timing of SWRCB staff reports

5g

released for other subbasins, the SWRCB staff should have sufficient time to prepare the draft staff report on the single, revised GSP ahead of a probationary hearing in March 2025.

5. **Discussion and Recommendation to the Coordination Committee for Confidentiality Agreement with Central Valley Salinity Alternatives for Long-Term Sustainability (CV SALTS) for Data Related to Archetype Study Update, Martin/Stadler/Dutton/Brodie**

   A copy of the data request from CV SALTS was included in the meeting materials. Anona Dutton explained that complying with the request will take over a week of EKI's time and $10,000 of budget. The Committee agreed to proceed with a confidentiality agreement with CV SALTS and to request that CV SALTS fund the data gathering efforts. Additionally, it was agreed that completion and adoption of the final GSP should take precedence and that CV SALTS should not publish their model until after the Subbasin has exited the probationary process.

6. **Discussion and Recommendation to the Coordination Committee for Suggested Updates to the Subbasin Data Management System (DMS) for Single GSP Data Storage, Compilation, and Annual Report Needs, Dumas/Dutton/Brodie**

   Leslie Dumas recommended to the Committee that improvements be made to the DMS to accommodate the increased frequency of data uploads and the addition of demand management triggers that will be required under the new GSP. Leslie Dumas also noted existing issues with the DMS that should be corrected. John Brodie agreed to work with Steve Stadler (SLWD) to identify the most critical items to upgrade and to contact Houston Engineering to determine whether those items can be covered under the existing DMS maintenance budget.

7. Next Steps

   - John Brodie will send the current version of the well mitigation policy to Lauren Layne for redlines. Lauren Layne will then forward a revised draft to Ellen Wehr, Ric Ortega, and Augustine Ramirez for further review.
   - The threshold for Undesirable Results for water quality will be MT exceedances in 15% of wells in three consecutive semiannual sampling events.
   - John Brodie will contact well drillers for well replacement cost estimates to provide context for the well mitigation policy.
   - EKI will revise the language in the Pumping Reduction Framework to emphasize Subbasin-wide consistency.
   - EKI will add the anticipated benefits of the new PID project to the model and storage change calculation.
   - The Committee will proceed with a confidentiality agreement with CV SALTS and request that CV SALTS fund the data gathering.
   - John Brodie will work with Steve Stadler to identify critical DMS upgrades and contact Houston Engineering regarding inclusion in the DMS maintenance budget.

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

   No reports were made under this agenda item.

9. **Future Delta-Mendota Subbasin Coordination Committee Meetings**

a) **Monday July 8, 2024 Grassland Water District**

b) **Monday July 22, 2024**

John Brodie reminded the Committee that a member or alternate from every GSA group is required to recommend GSA adoption at the July 22nd meeting.

10. ADJOURNMENT

John Wiersma adjourned the meeting at 4:05 PM.

DRAFT Meeting of the Northern Delta-Mendota Region Management Committee

Wednesday, June 5, 2024, 1:00 PM

Patterson City Council Chambers, 1 Plaza Circle, Patterson, CA

Northern Delta-Mendota Region Management Committee Members and Alternates Present

Adam Scheuber, Alternate – Del Puerto Water District (DPWD)
Vince Lucchesi, Member – Patterson Irrigation District (PID)
Bobby Pierce, Member – West Stanislaus Irrigation District (WSID)
Maria Encinas, Member – City of Patterson

San Luis & Delta-Mendota Water Authority (SLDMWA) Representative Present

John Brodie
Scott Petersen

Others Present

Caleb Stearns – WSID
Larissa Camara – City of Paterson

Others Present via Zoom

Anthea Hansen – DPWD
Kaitlin Bursey – Baker Manock & Jensen (BMJ)
Juan Ochoa – City of Modesto (latter portion of meeting)
Amir Mani – EKI Environment & Water, Inc. (EKI)
Susan Xie – EKI
Meredith Durant – EKI
Natalie Cochran – Woodard & Curran (W&C)
Margaret Caligaris – Trihydro
Brian Smith – Trihydro
Ryan Athey – Trihydro

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

   Bobby Pierce/WSID called the meeting to order at 1:02 PM.

2. **Pledge of Allegiance**

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

   John Brodie/SLDMWA noted that, per request from the Committee, meetings of the Committee will start at 1:00 PM.

4. **Opportunity for Public Comment**

   No public comment was provided.

5. Committee to Review and Take Action on Consent Calendar, Lucchesi/Brodie

   a. Minutes for the May 1, 2024 Meeting of the Northern Delta-Mendota Region Management Committee
   b. Budget-to-Actual Report
   c. Grant Reimbursement Summary Report

A correction to the minutes for the meeting on May 1, 2024 was requested. Vince Lucchesi/PID provided the motion to approve the Consent Calendar and Maria Encinas/City of Patterson seconded. The motion was passed unanimously by those present.

6. Committee to Discuss Public Review Draft of Single GSP, Brodie/Dutton

   a. Deadline for Public Comments
   b. Review and Incorporation of Public Comments
   c. Coordination Committee Adoption
   d. GSA Adoption
   e. Submission to SWRCB

John Brodie noted that a second webinar on the Draft Single GSP is scheduled for Friday June 7, 2024, a public meeting is scheduled for June 18, 2024 in Los Banos, and public comments are due by June 28, 2024. The received comments will be compiled and reviewed during the Coordination Committee meeting on July 8, 2024. The plan is to incorporate public comments into the draft GSP, with a recommendation by the Coordination Committee in late July that GSAs adopt the revised GSP.

A meeting with Subbasin representatives and the SWRCB staff is scheduled for June 20, 2024 to discuss the draft GSP, initial feedback, and subsequent process for incorporation of comments.

Development of more detailed and locally-specific plans for GSP implementation and management of groundwater pumping will be needed in the next few months.

7. Committee to Discuss Outreach

   a. Webinar, Public Meeting, and Newsletter, Brodie
   b. Review of Water Leadership Institute May 11, 2024 Session, Brodie
   c. Community Water Needs Assessment, Brodie

a. John Brodie noted that the webinar to review the Draft GSP is scheduled for Friday June 7, 2024 at noon. The public meeting to discuss the GSP and receive comments is scheduled for Tuesday June 18, 2024 at 4 PM. The latest Subbasin SGMA newsletter is included in the meeting materials.

b. John noted that approximately 30 people participated in the most recent Water Leadership Institute session. The content was focused on potential local impacts of SGMA, and methods for continued participation in local water management decisions at the GSA level. Some participants inquired about the process to become members of GSA boards. The final Institute session is scheduled for Saturday June 15, 2024 and will include a graduation event.

c. No input was received from Committee members on the Community Water Needs Assessment.

8. Committee to Discuss Single GSP Implementation, Brodie

   a. Upload Spring 2024 Water Level Data to DMS for Submittal to DWR
   b. Review of Water Quality Sample Analytical Procedures
   c. Perform Summer 2024 Water Quality Monitoring per Subbasin Protocols
   d. WY 2024 Annual Report and Beyond

a. John Brodie noted that W&C informed him that the spring water level data for the Northern Delta-Mendota region has been received and uploaded to the Subbasin data management system (DMS).
b. John Brodie referred to the list of water quality sample analytical procedures included in meeting materials; these procedures should be used throughout the Subbasin.
c. John Brodie provided a list of items in the draft GSP Pumping Reduction Plan for which more detailed implementation must be developed. Obtaining feedback on the single GSP from the SWRCB staff is important. Items must be adopted by October. The Committee requested to take up the first item on the list at the July meeting, and requested EKI prepare an estimate for assisting with the development of remaining technical aspects.
d. The Committee directed Vince Lucchesi to request that the Coordination Committee consider whether the Subbasin should develop a Request for Proposals regarding consulting services, including data evaluation and reporting, during GSP implementation.

9. Summary of SWRCB Staff Reports on Tule and Kaweah Subbasins, Dutton/Layne

Amir Mani/EKI summarized the SWRCB staff report on the Kaweah Subbasin GSP. The SWRCB comments were focused on the well mitigation program and also requested a land subsidence mitigation program. The SWRCB staff report expressed concern that the InSAR data from DWR may not be sufficiently frequent to evaluate and mitigate land subsidence, and that continuous reading equipment may be required.

Kaitlin Bursey/BMJ added that the thresholds for requiring installation of meters on groundwater supply wells differ between the Tule and Kaweah subbasins.

10. Committee to Discuss Status of Interconnected Surface Water Monitoring Well Design and Installation, Brodie

John Brodie noted the intention of the Exchange Contractors to fund installation of an interconnected surface water monitoring well. installation on their own. PID has provided an access agreement to Luhdorff & Scalmanini (LSCE), and WSID is revising a template access agreement to incorporate well construction access and ongoing monitoring. Grassland has requested the inclusion of a monitoring well completed in the Lower Aquifer. Once the access agreements are completed and the Notice of Exemption is filed, construction of the monitoring wells will be advertised for bid.

11. Report of the Representative to the Coordination Committee, Lucchesi

Vince Lucchesi reported on the May 13th 2024 meeting of the Coordination Committee. A significant topic in the Coordination Committee was the process for funding implementation of the Well Mitigation Policy across the Subbasin. The SWRCB expects Well Mitigation Policy funding to be supplied by the GSAs.

In response to the discussions in the Coordination Committee meeting, John Brodie and Scott Petersen are scheduled to meet with SLDMWA legal and financial staff to discuss whether and how creation and maintenance of such a fund can be accomplished under the existing SGMA Activity Agreement.

12. Committee to Discuss Potential Additional Funding Opportunities, Brodie

John Brodie referred to the updated list of Potential Funding Opportunities included in the meeting packet. The first opportunity on the list could augment/complement the Subbasin's Well Mitigation Policy. The USDA grant program has $5M to distribute in rural areas nationwide, and requires the applicant to be a non-profit organization. Scott Petersen proposed that SLDMWA staff will conduct additional evaluation of this opportunity.

13. Next Steps

- John Brodie will correct the minutes from the Committee meeting on May 1, 2024.
- John Brodie will retransmit his email regarding upcoming opportunities for public participation and review of the GSP.
- Vince Lucchesi will raise the topic of potentially soliciting proposals for preparation of the Subbasin Annual Report and other GSP implementation activities at the Coordination Committee meeting on June 10, 2024.
- John Brodie will include an item in the July 3rd Committee meeting agenda to discuss the GSP implementation, including local pumping management.
- John Brodie will include an item in the July 3rd Committee meeting agenda to discuss the water quality monitoring and reporting protocols.
- John Brodie will talk with EKI regarding additional scope and budget for assisting with components of the pumping reduction plan.
- John Brodie and Scott Petersen will meet with SLDMWA legal and accounting staff to discuss potential management of the Subbasin well mitigation fund by SLDMWA.
- SLDWMA staff will perform additional evaluation of the USDA grant opportunity.

14. Reports Pursuant to Government Code 54954.2(a)(3)

No reports were discussed under this item.

15. Future Meetings

a. Northern Delta-Mendota Region Management Committee

i. Wednesday, July 3, 2024 at 1:00 PM

b. Delta-Mendota Subbasin Coordination Committee

i. Monday, June 10, 2024 at 1:00 PM SLDMWA Board Room

ii. Monday, June 24, 2024 at 1:00 PM with Technical Working Group (if necessary)

iii. Future Special Coordination Committee meetings may be scheduled

16. ADJOURNMENT

Bobby Pierce adjourned the meeting at 2:24 PM.

#	General Responses
General Response #1	Regarding the temporal and spatial resolution of analysis used to estimate depletion of ISWs and later define sustainable management criteria (SMC): As indicated in Sections 8.9.5 and 9.6 of the GSP, insufficient data is available at several segments of the San Joaquin River with respect to shallow groundwater levels and streamflow. These data gaps are due to a combination of insufficient historical coverage, frequency of measurements, and spatial coverage. In addition, the Model used for quantifying the depletion of interconnected surface waters (ISW) due to pumping is a relatively coarse-resolution regional model that is not yet calibrated to represent finer-scale details due to both its timing of release and availability and lack of sufficient local data. GSAs in the Basin have presented a comprehensive plan to establish an ISW monitoring network using shallow and nested monitoring wells along the river that can be used conjunctively with available stream gages. The ISW monitoring network is grant-funded and currently under implementation. Accordingly, GSAs in the Basin plan to rectify the identified data gaps through the continuation of their data-gathering efforts and revise any information or criteria that seem needed upon the availability of additional data. GSAs have followed available guidance and used the best available tools and data at the time of GSP development to address the requirements under SGMA, as requested under CCR 23, § 354.16: "Each Plan shall provide a description of current and historical groundwater conditions in the basin, including data from January 1, 2015, to current conditions, based on the best available information [...] (f) Identification of interconnected surface water systems within the basin and an estimate of the quantity and timing of depletions of those systems, utilizing data available from the Department, as specified in Section 353.2, or the best available information." The analysis and results were presented in the most representative spatial and temporal scale considering data gaps and uncertainties. Providing higher-resolution results that are not supported by measured data and the level of accuracy provided by the model would lead to misinformed decision-making and planning. Basin GSAs have been proactive in their approach in addressing the depletion of ISWs and are committed to revising data, information, and criteria in the Plan if supported by additional data. This follows the Department of Water Resources (DWR) Depletion of ISW Introduction Paper (DWR First Paper): "[i]t is infeasible to provide details of data and analysis for estimation of depletions of ISW for every time scale and for every location of every surface water body. Thus, water managers need to select spatial and temporal scales appropriate for their basin and the beneficial uses and users that need to be considered." Further, "[r]egardless of the approach used to identify ISW, conclusions should be based on the best available science, information, and professional judgment; convey the uncertainty associated with those conclusions; and recommend reasonable approaches to fill identified data gaps."

#	General Responses
General Response #2	Regarding the inadequacy of the definition of the depletion of ISWs undesirable results and SMC: The Basin GSAs appreciate the CSPA's sensitivity to this issue and are equally diligent in addressing any potentially significant and unreasonable impacts on beneficial users of surface water due to depletions of ISWs caused by groundwater pumping in the Basin. While many SGMA Basins, including those with approved GSPs, are still in the data-gathering phase and awaiting further guidelines from DWR to define undesirable results and SMC based on the rate and volume of depletions, the Basin GSAs have proactively decided to use the best available data and information to set protective SMCs that ensure the protection of beneficial users to the extent required under SGMA. It is important to acknowledge the complexity of an interconnected system such as the San Joaquin River, the variety of stakeholder groups and regulatory programs involved in its management, the multitude of factors impacting the depletion of surface water in the system, and the requirements outlined by SGMA. To assume the GSPs are the primary mechanism for protecting beneficial users impacted by various factors causing the depletion of surface water, one of which is the Basin's pumping, is not supported by SGMA, given the limited authority of GSAs to manage surface water systems. As indicated by CWC § 10727.2(b)(4): "The plan may, but is not required to, address undesirable results that occurred before, and have not been corrected by, January 1, 2015." By defining the SMCs based on calculated volumes of depletion prior to January 2015, the GSP is fully complying with SGMA requirements while not allowing any further impacts beyond what was experienced before 2015 to beneficial users due to the depletion of ISWs caused by pumping in the Basin. In other words, the GSP considers any additional impact beyond what is not required to be addressed under SGMA as significant and unreasonable and intends to prevent that through the sustainable long-term operation of the Basin. Furthermore, the GSP defines SMC for the chronic lowering of groundwater levels to be equal to groundwater levels experienced in 2015. Several approved GSPs have used groundwater levels as a proxy for the depletion of ISWs. While the GSP complies with SGMA by defining SMC based on the rate or volume of depletion of ISWs caused by groundwater pumping, it also maintains groundwater levels at 2015 levels or above, further ensuring no additional impacts to beneficial users and uses compared to 2015 conditions. As the State Water Resources Control Board (SWRCB) noted in its staff letter for Tulare Lake Subbasin: "[s]etting groundwater level MTs at or above 2015 groundwater elevations will avoid undesirable results for other Sustainability Indicators beyond undesirable results that occurred before, and had not been corrected by, January 1, 2015." Lastly, the GSP includes a pumping reduction plan (PRP) that will be implemented conjunctively by all GSAs in the Basin. The PRP includes an overdraft mitigation component and a groundwater level MT avoidance component (GWL-MT), both focused on changing pumping patterns in the Basin to avoid groundwater level undesirable results. Consequently, even before the Basin reaches any condition close to groundwater level undesirable results (and correspondingly depletion of ISWs undesirable result), at the possibility of MT occurrence, pumping reduction actions will be taken in the Basin. The PRP will help ensure that the GSP avoids depletions of ISWs caused by Basin pumping that surpass conditions experienced in 2015. Overall, the definition of undesirable results and minimum thresholds provided in the GSP fully comply with SGMA requirements and protect beneficial users and uses in the Basin. Additionally, the GSP goes further by maintaining groundwater levels at 2015 levels and taking proactive actions under the PRP to ensure compliance.

#	General Responses
General Response #3	Regarding the comments on the defined UR and MT for Subsidence: GSAs appreciate and share the FWA's concern regarding the management of subsidence in the Basin, particularly along the DMC. Unlike most Basins located in subsidence hotspots in the Central Valley, the Delta Mendota Subbasin provides reliable surface water supply under its senior water rights, primarily from the CVP and San Joaquin River, using groundwater as a supplemental resource. GSAs in the Basin depend on a well-operated DMC for water supply deliveries and have diligently set protective SMCs and designed and implemented P/MAs and PRP to ensure the sustainable operation of the DMC and the Basin concerning subsidence. This has resulted in one of the most stringent subsidence criteria among Basins with historical subsidence issues. SGMA allows until January 2040 for chronically overdrafted basins, such as Delta Mendota, to reach sustainability, recognizing that chronic and complex problems like subsidence cannot be addressed short-term and require collaboration among numerous basins and GSAs. As demonstrated in the GSP, a significant portion of subsidence experienced in the Basin originates from neighboring Basins. The Madera and Chowchilla subbasins, where some of the greatest nearby subsidence is occurring, also intend to halt subsidence by 2040. Understanding the physical characteristics of subsidence occurrence, the comparably limited cumulative subsidence defined as MT in the Basin by 2040 is reasonable, while the Basin addresses the causes of ongoing subsidence. The 2-ft subsidence considered in the GSP as the basis for setting SMC is not a circular reference but was estimated before GSA efforts in developing the Single GSP. The 2-ft minimum threshold applies to any location in the Basin, not just along the DMC. Additionally, the GSP defines both cumulative subsidence and the rate of subsidence as MTs, as required by SGMA, with each criterion needing compliance irrespective of the other. Therefore, GSPs will prevent subsidence at any location in the Basin due to Basin management that exceeds those rates, regardless of cumulative subsidence. Furthermore, GSAs have set chronic lowering of groundwater level MTs at both aquifers at 2015 levels, which should automatically protect against additional subsidence due to Basin management beyond what occurred in 2015 and is not required to be addressed under SGMA. Since groundwater levels will be kept at or above the groundwater elevations that occurred in 2015, no additional subsidence is expected to occur other than residual subsidence due to pre-SGMA conditions. The SWRCB has concurred that maintaining water level MTs at 2015 water levels is considered sufficiently protective for the other sustainability indicators. Specifically, per the SWRCB Staff Report on Tulare Lake, "Setting groundwater level MTs at or above 2015 groundwater elevations will avoid undesirable results for other Sustainability Indicators beyond undesirable results that occurred before, and had not been corrected by, January 1, 2015." (SWRCB, 2024) The GSP includes a comprehensive PRP framework with plans for overdraft mitigation, groundwater level MT avoidance, subsidence mitigation, and groundwater allocation backstop. These plans have clear triggers to manage pumping patterns in the Basin to avoid MTs before reaching levels close to the defined URs. The PRP requires proactive action to avoid and mitigate any MTs in the Basin. The subsidence mitigation plan includes a critical infrastructure component specifically designed to protect the DMC and other water supply infrastructure and mitigate subsidence hotspots, preventing MT at any location in the Basin. Both components have stricter criteria than those considered under the defined Subsidence UR and SMC and are accompanied by pumping measurements, defined zones of influence along critical infrastructure, subsidence trigger rates, and timelines for initiating and continuing pumping reductions. The PRP and subsidence SMCs defined and designed under the GSP follow a diligent subsidence study conducted by GSI in 2022 and adhere to its recommendations.

Comment Reference	Comment	Relevant Revised GSP Section	Comment Response
CSPA-1	The Draft GSP provides little information on streamflow. While the text and tables in Chapter 8 describe stream "stage," there is no table or figure comparing groundwater levels to flow. (Draft GSP at pp. 174-75, Fig. GWC-55.) And while the Draft GSP provides modeled depletion figures, these are expressed in acre feet per year, without any reference to streamflows. (Draft GSP at pp. 176-77.) In other words, the Draft GSP does not explain whether the depletions attributable to groundwater management in the basin represent a small percentage, half, or all of the flow of the river at a given time of the year.	8.7.1	The draft GSP provides total streamflow depletion and streamflow depletion due to pumping occurring in the identified interconnected portion of the San Joaquin River along the Delta Mendota Subbasin (Basin) boundary. The volume provided in acre-foot can be converted into other flow units on an average basis. The GSP section will be modified to provide an annual average value in CFS in parenthesis in said tables.
CSPA-2	Tables GWC 10 and 11 also fail to adequately characterize the timing of stream depletions, as required by SGMA Regs. section 354.16(f). Depletions are presented by season. But the definition of "season" is not presented, leaving ambiguity as to how the GSP defines each season. And a seasonal figure is insufficient for characterizing impacts to salmonids.	8.7	The draft GSP will be revised to provide a definition of seasons. Regarding the temporal resolution of analysis, refer to General Response #1.
CSPA-3	Failure to account for timing of depletions is notable in light of the Draft GSP's statement that "Depletions of ISW are minimal during low flow conditions because of low surface- water flow and stage. The most significant depletions of ISW happen during high flow conditions, specifically during periods of runoff following the dry Summer and Fall when groundwater levels are lowest." (Draft GSP at p. 176.) This statement ignores that instream beneficial uses may be at their most sensitive during low-flow conditions.	8.7	Regarding the temporal resolution of analysis, refer to General Response #1. The statement quoted from the GSP is solely comparing the volumes of depletions in different seasons and is not intended to provide correlation with impact on beneficial users. The sentence will be revised to better clarify.
CSPA-4	Tables GWC 10 and 11 also fail to provide adequate information on the location of depletions, as required by SGMA Regulations section 354.16, subdivision (f). The tables only provide depletions for the entire basin (after excluding several streams and reaches of the San Joaquin River). The total depletions over a 100-mile stretch of the San Joaquin River provide insufficient information to manage groundwater to avoid harms to fish. This is especially true as some runs of salmonids require access to the Stanislaus, Tuolumne, and Merced Rivers, while others spawn in the upper reaches of the San Joaquin. Below the Merced confluence, the River is subject to the San Joaquin River Restoration Program (SJRRP), which may require different management strategies to ensure adequate flows reach the Merced confluence. A 2022 comment letter from the SJRRP Restoration Administrator to DWR regarding the Delta-Mendota Coordinated GSP stated that "During most times of the year other than the wettest periods, losses of 50% to 65% of the flows released to the river at Friant Dam prior to arrival at the Merced confluence are typical." These depletions, and their effects on instream beneficial uses, must be detailed and addressed.	8.7	Regarding the temporal and spatial resolution of analysis, refer to General Response #1. It is important to emphasize that under the Sustainable Management Act (SGMA), the focus on the depletion of Interconnected Surface Waters (ISWs) is limited to those depletions caused by groundwater use within the Basin. Other primary factors contributing to the total depletion of surface water include, but are not limited to, flow regimes, reservoir and local releases, surface water diversions, climatic conditions, and river channel. Additionally, surface water bodies like the San Joaquin River, which is shared between the Delta-Mendota Subbasin and several other subbasins, and which receives water from rivers outside the Basin, are influenced by operations in other basins. Therefore, total depletion and streamflow are not measures required or suitable for investigation by the Groundwater Sustainability Agencies (GSAs).

Comment Reference	Comment	Relevant Revised GSP Section	Comment Response
CSPA-5	The exclusion of certain streams, water bodies, reaches from the definition of ISW also raises concerns, as described by Mr. Kamman. In addition, the GSP excludes reaches of the San Joaquin River south of milepost 106. (Draft GSP at p. 175.) This exclusion is based upon a correlation between stream stage and groundwater levels in the upper aquifer. Yet previous iterations of the GSP include those reaches as ISW. The GSP fails to explain why the methodology for describing ISW has changed, and why it now excludes sections of the San Joaquin River where the GSAs had previously reported significant communication between the river and shallow groundwater; nothing in SGMA justifies excluding such shallow or perched groundwater from the definition of ISW.	8.7	The analysis used to identify ISWs in the Basin is focused on using best available data and information and follows the recommended approaches by the DWR First Paper: "Perennial and intermittent surface water bodies are most likely to be ISW, while ephemeral surface water bodies are generally not ISW due to their relationship to the groundwater aquifer.[...] Determining if a surface water body is an ISW can be challenging. A common method is to compare groundwater elevation data at wells near the surface water body with the elevation of the bottom of the surface water body. [...] Nearby shallow wells that exhibit groundwater elevations that mirror water levels in the adjacent surface water body may indicate a connection at that location. [...] Regardless of the approach used to identify ISW, conclusions should be based on the best available science, information, and professional judgment; convey the uncertainty associated with those conclusions; and recommend reasonable approaches to fill identified data gaps." As shown in Figures GWC-55 and GWC-56, groundwater levels in the southern portion of the San Joaquin River do not track streamflow patterns and are significantly deeper than its streambed, confirming the disconnection between the River and the Aquifer system beneath it.
CSPA-6	Mr. Kamman has identified a major calculation error in the water budget, which casts doubt on all of the Draft GSP's conclusions, including its sustainable yield calculations and its conclusion that it will reach sustainability by 2040. This is discussed on pages 3 through 5 of his attached comments. This error must be addressed in the final GSP.	9.3	We understand the confusion and will accordingly adjust the water budget tables and definitions of water budget components in the GSP to clarify. This is not an error in the water budget and does not have any impact on the calculation of other water budget components, overdraft, or sustainable yield. As explained in Section 9 of the GSP, the water budget is calculated from the Model and is not modified except to develop averages for different periods and round numbers to the nearest thousands. Water budgets resulting from Models (here CVHM2) are inherently consistent. The confusion in stream-groundwater interaction is due to using aquifers as the receiver of the flow in both Land-surface and groundwater budgets, which will be adjusted to provide better clarification of inflows and outflows from all systems. The 79,000 AFY flow is consistent between the Land-Surface Water System and Upper Aquifer, and the 101,000 AFY flow is the summation of 96,000 and 5,000 AFY in Upper and Lower Aquifers.
CSPA-7	The draft GSP does not define undesirable results based on SGMA requirements and fails to assess the impacts of pumping on listed species and the ecosystems they rely on.	13.6	Refer to General Response #2.

Comment Reference	Comment	Relevant Revised GSP Section	Comment Response
CSPA-8	While the GSP gestures towards impacts on surface water users and environmental users (Draft GSP at p. 250), it fails to analyze "when and where" impacts on those users become significant and unreasonable (SGMA Regs. § 354.26, subd. (b)(1).) Instead, by pegging the definition to conditions in 2014—a historic drought year in the midst of a multi-year drought—the GSP simply assumes that any greater depletions are significant and unreasonable, while smaller depletions are not. This logic ignores the text of SGMA and the regulations, both of which require linking groundwater conditions with the "effects" of those conditions, and determining when those "effects" become significant and unreasonable. (See § 10721, def. (x)(6), SGMA Regs. § 354.26, subd. (b).) The text of the regulations and the statute requires separately analyzing "depletions" and their "effects"; to do otherwise renders language in governing laws surplusage. (See Moyer v. Workmen's Comp. Appeals Bd. (1973) 10 Cal.3d 222, 230; Bernard v. Foley (2006) 39 Cal.4th 794, 811.) The GSP's logic takes an improper shortcut by defining "undesirable results" solely by reference to a modeled depletions figure, without any significant consideration of what effects those depletions have on streamflows at key migration periods, temperatures, surface water quality, or other relevant conditions.	13.6	Refer to General Response #2.
CSPA-9	It is not enough to assume, as the Draft GSP does, that any depletion pre-2015 need not be addressed. (See Draft GSP at pp. 248-49; see § 10727.2, subd. (b)(4).) 2014 was a uniquely dry year, with the lowest precipitation in the 2003-2023 period.20 (Draft GSP at p. 185.) Yet groundwater extraction was above-average in 2014, implying that depletions caused by groundwater use were likely high that year. (See Draft GSP at Table WB-2.) Without analyzing the instream effects of pre-2015 depletions, the GSAs do not have the information to know whether those depletion levels were significant and unreasonable or not. Further, the GSP's own logic does not hold up. The Draft GSP states that "the Undesirable Results definition appropriately focuses on whether ISW has been depleted as a result of water management actions since the enactment of SGMA on January 1, 2015." (Draft GSP at p. 249.) But such an inquiry does not depend on depletion levels prior to January 1, 2015: the appropriate question is whether depletion levels are having a significant and unreasonable effect on beneficial uses.	13.6	Refer to General Response #2.
CSPA-10	The failure to analyze the effects of the Draft GSP's undesirable results definitions extends to the discussion of Projects and Management Actions (PMAs) in Chapter 15 and Plan Implementation in Chapter 16. None of the PMAs discuss in any detail whether they will have negative effects on conditions in interconnected surface waters. And this is despite the fact that several may have direct effects on surface flows. These include the Del Puerto Creek reservoir project, the diversion of flows to recharge from the Chowchilla Bypass (along with infrastructure allowing additional diversions at lower flows) and reactivation of the Aliso Canal, the North Grassland Water Conservation and Water Quality Control Project, Los Banos Creek diversion projects. (Draft GSP at Table PMA-1.) All of these projects involve new or changed diversions from surface water systems, yet none analyze their effects on streamflows or the species that depend on such flows.	15.3	It is important to emphasize that SGMA requires GSAs to address the depletion of ISWs caused by groundwater pumping in the Basin. Most Projects and Management Actions (P/MAs) developed under the GSP intend to provide additional supply and recharge, both leading to improving conditions for ISWs. Impacts to surface water conditions due to projects that do not involve direct increases in groundwater use should be addressed outside the requirements of SGMA through existing regulations for surface water diversion and recharge permitting, CEQA and NEPA, etc. All projects outlined in the GSP will follow the appropriate regulatory and permitting processes as indicated in the GSP. None of the projects outlined in the GSP are projected to impact groundwater pumping in the Basin in a manner that causes significant and unreasonable impacts in the depletion of ISWs and their beneficial users and uses.

71

Comment Reference	Comment	Relevant Revised GSP Section	Comment Response
CSPA-11	And Chapter 16's Pumping Reduction Plan, while it contains specific plans for overdraft and for when the MTs for groundwater levels, water quality, and subsidence are exceeded, contains no plan for exceedance of the ISW MT. Nor does it provide any analysis of whether the other implementation activities will protect ISWs and beneficial uses of surface water in any way.	16.1	Refer to General Response #2. GWL-MT component of PRP intends to avoid occurrence of groundwater level MTs in the Basin through targeted pumping reduction. Groundwater level MTs are set at 2015 levels and are protective of beneficial users and uses as required by SGMA and explained in General Response #2.
CSPA-12	GSP does not set protective MTs for depletion of ISWs required under SGMA.	13.6	Refer to General Response #2.
CSPA-13	GSAs are required to include "monitoring and management of . . . changes in surface flow and surface water quality that . . . are caused by groundwater extraction in the basin," when such conditions are present in the basin.24 (§ 10727.2, subd. (d)(2).) The San Joaquin River is listed under Clean Water Act section 303(d) as impaired for temperature. Yet the GSPs contain almost no discussion of water temperature or the effects of groundwater management on river temperatures, nor do they contain a plan to do so. Moreover, section 10727.2, subdivision (f) requires monitoring "designed to detect" "flow and quality of surface water that directly affect groundwater levels or quality or are caused by groundwater extraction in the basin." This section further emphasizes the need for surface water temperature and flow management monitoring. Yet the Monitoring Network chapter makes no mention of surface water temperature monitoring. This violates SGMA	14.2	Temperature impairment is a complex issue that is not solely caused by the depletion of ISWs due to groundwater pumping in the Delta Mendota Subbasin and not intended to be resolved under SGMA. It needs to be comprehensively addressed under the appropriate regulatory program. The GSP complies with SGMA requirements by avoiding significant and unreasonable impacts on beneficial users and uses of surface waters caused by Basin pumping. This is achieved by maintaining both groundwater levels and ISW depletion volumes caused by pumping at 2015 levels, as ideally requested by SGMA. Furthermore, in interpreting this regulation, DWR's BMP guidelines for monitoring networks and identification of data gaps (https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/BMP-2-Monitoring-Networks-and-Identification-of-Data-Gaps_ay_19.pdf) and sustainable management criteria (https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/BMP-6-Sustainable-Management-Criteria-DRAFT_ay_19.pdf) provide no indication that surface water quality monitoring is required.
CSPA-14	The Draft GSP contains no public trust analysis or findings.	8.7	The GSAs operate under SGMA and its associated regulations. SGMA clearly outlines a staged process to full compliance with the sustainability criteria by 2040. A clear plan and adaptive management were proposed to prevent undesirable results for beneficial users of surface water caused by the depletion of ISWs due to pumping. Furthermore, according to Draft Staff Report for Kaweah Subbasin: "GSPs that meet SGMA's requirements will assist in evaluating impacts to public trust resources, such as fish and wildlife beneficial uses, because they will include a physical description of groundwater-surface water interaction in the basin and, if applicable, monitoring and management of changes in surface flow and surface water quality caused by groundwater extraction in the basin (Wat. Code, § 10727.2, subds. (a)(2), (d)(2))." Therefore, the analysis provided in the GSP aligns with the requirements of the public trust doctrine, and a separate analysis is not necessarily required.

Comment Reference	Comment	Relevant Revised GSP Section	Comment Response
AKT-1	AKT is in general agreement with the Draft GSP's findings and supports its lack of explicit groundwater pumping restrictions in the Delta-Mendota Subbasin's Upper Aquifer. AKT agrees that groundwater levels in the Upper Aquifer have stabilized over recent years, with several overall increases. AKT also agrees that each Groundwater Sustainability Agency (GSA) operating within the Delta-Mendota Subbasin should determine and adopt the technical framework specific to that GSA's or GSA Group's subbasin(s), under which the GSAs collectively will achieve the minimum overdraft reduction for each principal aquifer. Furthermore, AKT agrees that the Upper Aquifer requires far fewer overdraft reductions than the Lower Aquifer and that those reductions could be met by measures other than pumping reduction. AKT supports the GSP approach to prioritizing municipal use of groundwater, as reflected in footnote 57 in Chapter 16 of the Draft GSP.	8, 16.1.1.1	Comment acknowledged.
Stanislaus-1	For consideration into future GSP updates/amendments: Recommend a more rigorous calibration of the model based upon ongoing monitoring data. A rigorous calibration of the model will help to focus mitigation efforts on a smaller scale. If minimum thresholds (MTs) are exceeded, currently a broader application of pumping reductions are outlined while more focused adaptive management may be more appropriate. A more robust understanding with a more predictable model tool could help the smaller users.	Executive summary	The Model will be calibrated prior to implementation of the PRP, subject to GSA approval.
Stanislaus-2	Representative monitoring well (RMW) 01-005 appears to be a DM II well and not a northwest DM GSA well. Edit to reflect.	Table MN-1	RMW 01-005 is a Northwestern Delta-Mendota well. The well may appear to be in the Delta-Mendota II GSA in maps, because the portion of the Northwestern Delta-Mendota GSA that the well is located in is very small and is covered by the well symbol.
Stanislaus-3	Provide confirmation that the County planned to add 05-124 (upper) to the RMW network. Previous discussion had focused on adding only 05-128 (upper) and 05-127 (lower). The County can work with the property owners to ensure the well is available and accessible or find a suitable replacement to close data gaps.	Table MN-1	Inclusion of 05-124 has been confirmed.
Stanislaus-4	213 River Rd. is RMW 05-127. This is a duplicate entry and needs to be removed.	Table MN-1	The duplicate has been removed.
Stanislaus-5	RMW 05-128 will not work, but previous discussion indicated that a well of similar depth in the area would be a suitable replacement. The County has identified a well that looks very promising and will have more information from the property owner in the next few weeks for inclusion into the GSP RMN.	Table MN-1	RMW 05-128 has been removed.
Stanislaus-6	For consideration into future GSP updates/amendments: Within the GSP executive summary and Appendix H there is language noting the analytical shortcomings of the model process. Currently the model utilizes the "farm process" which estimates water usage in a location based upon crop/vegetative cover type. Moving forward with well metering and collection of water level data, the model should be revisited and an effort to calibrate the farm process-based model with RMW data might be considered to adjust the model to reflect more current basin conditions for future management strategies.	Appendix H (Model)	The Model will be calibrated prior to implementation of the PRP, subject to GSA approval.

Comment Reference	Comment	Relevant Revised GSP Section	Comment Response
Stanislaus-7	Provide additional information regarding how the ¼ mile radius of influence from each RWM was delineated. The ¼-mile radius threshold may not be enough to determine if a domestic well is eligible for replacement. The potential domestic wells that are more than ¼-mile from RMWs may go dry, or experience water quality impacts, and this part of the plan does not clarify whether a well in this predicament is eligible for mitigation.	Appendix N Well Mitigation Policy	CC to respond
LSCE-1	Section 1.2 page 26, references to Section 13 are written as "Section 1313"	1	Typo fixed.
LSCE-2	Section 1.2 page 26 last bullet point, "For Chronic Lowering of Groundwater Levels, added a well impacts analysis to the justification of criteria for Undesirable Results that demonstrates in the worst-case scenario, 98 drinking water wells will be impacted, which is within the scope of the Well Mitigation Policy to address" Seems as if this section should not get too detailed with numbers of well and should just mention a well impact study that is further described in the referenced section. This statement does not elaborate on what "impacted" means. If you want to keep this phrase in, then please rephrase and say "dewatered" or whatever specific impact is being referred to.	1	The bullet point is revised to mention the well impact study that is further described in the referenced sections. Clarification on what "impacted" means is also added.
LSCE-3	Section 2 page 28, Reference to "GSP" and "Sustainability Plan" should be singular.	2	Typo fixed.
LSCE-4	Section 3.2 Organization and Management Structure of Agency Table Intro-2 on page 34, Fresno County Management Area B is not a GSA within the Exchange Contractors GSA Group. The Fresno County 2022 GSP in Appendix D includes a Memorandum of Understanding that all Management Area B land north of Management Area A is incorporated in the SJREC GSP.	3	Removed Fresno County Management Area B from the SJREC GSA Group.
LSCE-5	5.1.2 Areas Covered by the Plan on page 40, Why the focus on GSA Groups rather than individual GSAs? Seems as if there is a potential for the diversity of GSAs in the basin to be lost or overshadowed by the focus on the larger GSA Groups, although this approach also provides more information on the small GSA groups, such as Farmers and Fresno County, compared to larger GSA groups that cover more geographic extent.	5	GSA Group is discussed in Section 5.1.2 since the MOA updates the Basin governance structure with an emphasis on GSP implementation and defines seven GSA Groups to guide management of separate portions of the Basin.
LSCE-6	Section 5.1.2.3 on page 42, "Farmers Water District lands within the Basin rely exclusively on groundwater to meet agricultural demands and de minimis domestic use." Change "exclusively" to "primarily" FWD has diverted surface water for water bank recharge.	5	Changed "exclusively" to "primarily".
LSCE-7	Section 5.1.2.6 on age 43, "Additionally, there are currently two groundwater recharge projects in the Fresno County GSA Group Area, the Meyers Water Bank and the Terra Linda Recharge Canal." The Terra Linda Recharge Canal has been expanded to include two ponds. Change "Canal" to "Ponds".	5	Changed "Canal" to "Ponds".
LSCE-8	Section 5.1.4 Table PA-3 on page 51 o FWD water sources should include Kings River flood releases o FCMA Management B water sources should include CVP supplies o Under Water Sources, Grasslands has two bullet points with no text.	5	Changes were made to incorporate this comment.

Comment Reference	Comment	Relevant Revised GSP Section	Comment Response
LSCE-9	Section 13.4.2.1 Minimum Threshold Development. Figure SMC-9 is unclear. The methodology for wells that exceed health screening standards is described as using the last calendar year with data in the period of 2010-2014 plus the maximum annual fluctuation. The data point with the applied fluctuation is from 2011, but there is a data point in 2014. The figure does not appear to match how it is described in the text.	13	Revised figure to match text description.
LSCE-10	Section 13.2.1 page 230, "1. Groundwater levels decline below the established MTs in 25% or more of RMW-WLs for two consecutive years (i.e. four consecutive seasonal measurements)," o With quarterly groundwater level monitoring, this should be eight consecutive seasonal measurements.	13	Changed to eight consecutive quarterly measurements.
LSCE-11	Table MN-1. SPRECK-MW-32 is missing. This is the water quality RMS site for Fresno County Management Area A.	14	Revised Table MN-1 to include SPRECK-MW-32.
LSCE-12	Section 16.1.1 Pumping Reduction Plan. The subsection title on the bottom of page 301 misspelled "Pumping Reduction Pan".	16	Typo fixed.
LSCE-13	Section 16.1.1 There are two references to annual groundwater quality sampling on page 303. Update to semi-annual and make references to seasonal high and seasonal low periods.	16	Updated to semi-annual sampling in section 16.1.1.
LSCE-14	Section 16.1.3 on page 305. "The PRP will evaluate the groundwater level deficit, define lands to be restricted, and develop an allowable pumping limit on an acre-foot per acre basis by principal aquifer to be implemented and maintained up to the end of the water year or until monitoring indicates the groundwater level recovers to be above the established trigger level." o This is a pumping reduction plan, not an allocation. Change "allowable pumping limit on an acre-foot per acre basis" to "pumping reduction on an acre-foot by acre basis".	16	Changed "allowable pumping limit on an acre-foot per acre basis" to "pumping reduction on an acre-foot by acre basis".
LSCE-15	Page 12 of the Memorandum of Agreement under Article VIII – Monitoring Network o This section refers to the Upper Aquifer as the "shallow aquifer" and the Lower Aquifer as the "deep aquifer". The references to specific aquifers should be consistent with the GSP.	Appendix D	CC to respond
FWA-1	GSP should have a figure or figures that highlight the areas of the DMC that have experienced historical/recent subsidence and these areas should be noted in the narrative text of this section, to the extent information is available.	8.6	To the extent this information is available, changes will be made to the text and figures. A key map will be added to Figure GWC-44 and Figure GWC-45 to show areas of the DMC that have experienced historical/recent subsidence. Canals and Aqueducts, including DMC, are shown on basin-wide subsidence figures (Figure GWC-43 and Figure GWC-48). The GSI Master Plan will be included as an appendix in the GSP, and it is discussed in Section 8.6.3 of the GSP. The GSI Master Plan formed the basis for the Representative Monitoring Network (Chapter 14) for land subsidence, the Projects and Management Actions (P/MAs) (Chapter 15), and the Pumping Reduction Plan (Chapter 16) to halt subsidence within the Basin.

Comment Reference	Comment	Relevant Revised GSP Section	Comment Response
FWA-2	Additional information should be obtained from the San Luis & Delta-Mendota Water Authority (SLDMWA) and the United States Bureau of Reclamation (USBR) in order to establish a baseline condition for the current reductions in the conveyance capacity of the DMC in terms of specific segments of the DMC (as opposed to the generalized statement in the Section 8.6 that "Subsidence within the Basin has reduced flow capacity on the DMC by as much as 1,000 cubic feet per second.")	8.6	Draft EA/IS provides estimates of reduction in flow in 2020 from design flows in Figure 2.1. The figure will be included and cited to provide information.
FWA-3	Clarify the scope, status and timing of the proposed DMC capacity correction project and relationship to the proposed subsidence minimum threshold.	13.5	Noted and will be clarified to the extent possible and based on available information.
FWA-4	Reconsider the proposal to set a two-foot minimum threshold for land subsidence as applicable to the entire DMC.	13.5	Refer to General Response #2.
FWA-5	Refine critical infrastructure subsidence management actions and mitigation measures based on further review and reconsideration of the MT for subsidence along the DMC.	16.1	Comment noted.
FWA-6	Refine the proposal to set groundwater level minimum thresholds at or above 2015 groundwater levels	13.1	Comment noted. Refer to CWC § 10727.2(b)(4): "The plan may, but is not required to, address undesirable results that occurred before, and have not been corrected by, January 1, 2015." The SWRCB has concurred that maintaining water level MTs at 2015 water levels is considered sufficiently protective for the other sustainability indicators. Specifically, per the SWRCB Staff Report on Tulare Lake, "Setting groundwater level MTs at or above 2015 groundwater elevations will avoid undesirable results for other Sustainability Indicators beyond undesirable results that occurred before, and had not been corrected by, January 1, 2015." (SWRCB, 2024)
FWA-7	Change subsidence measurement to be based on total subsidence not just inelastic subsidence	14.2	CC to provide direction

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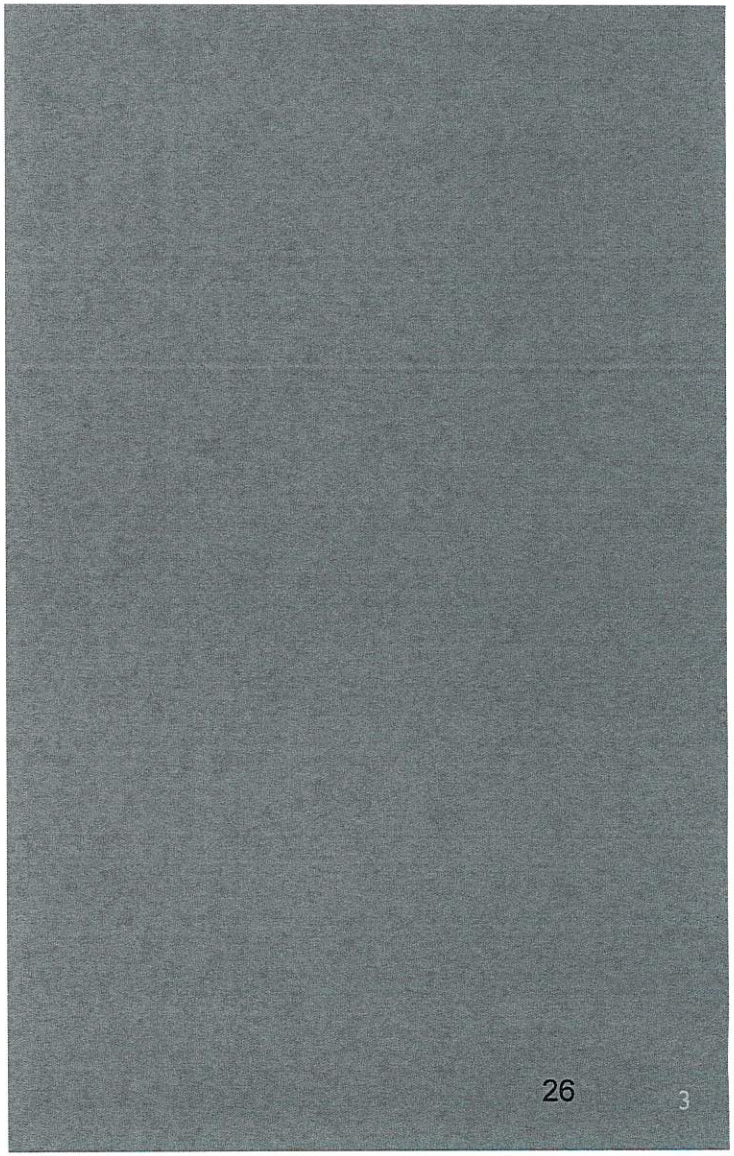
DELTA-MENDOTA SUBBASIN
RESPONSE TO INADEQUATE DETERMINATION

8 JULY 2024
COORDINATION COMMITTEE

OVERVIEW

- Major Comments Received on the Public Draft GSP and Proposed GSP Revisions
  - A table attachment is provided detailing comments, responses, and proposed revisions
- GSP Timeline

MAJOR COMMENTS AND PROPOSED GSP REVISIONS



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79

SGMA PRINCIPALS RELIED UPON TO DEFINE URs AND SMC

- CWC § 10727.2(b)(4): "The plan may, but is not required to, address undesirable results that occurred before, and have not been corrected by, January 1, 2015."
- SWRCB staff report for Tulare Lake Subbasin: "[s]etting groundwater level MTs at or above 2015 groundwater elevations will avoid undesirable results for other Sustainability Indicators beyond undesirable results that occurred before, and had not been corrected by, January 1, 2015."
- CCR 23, § 354.16: "Each Plan shall provide a description of current and historical groundwater conditions in the basin, including data from January 1, 2015, to current conditions, based on the best available information."
- SGMA provides a timeline by January 2040 to reach sustainability if URs are avoided.
- SGMA is focused on impacts caused by groundwater management and use within the Basin, for which GSAs have the authority to manage through groundwater pumping management and the imposition of fees. GSAs do not have the authority or regulatory tools to manage impacts that fall outside the scope of SGMA.

MAJOR COMMENTS FROM STANISLAUS COUNTY

- Recommend future model calibration.
  - Comment noted.
- Remove a duplicate entry and replace RMW 05-128.
  - RMW-related tables, figures, and text will be updated, pending provision of a Lower Aquifer well to replace RMW-05-128 (needed to maintain sufficient well density).
- Request additional information in the well mitigation plan regarding how the ¼ mile radius of influence from each RMW was delineated.
  - **Comment for CC to consider.**

MAJOR COMMENTS FROM LSCE

- Suggestion to focus on individual GSAs rather than GSA groups in Section 5.1.2 Areas Covered by the Plan.
  - Keep as is since the MOA updates the Basin governance structure with an emphasis on GSP implementation and defines seven GSA Groups to guide management of separate portions of the Basin. **CC to confirm or provide further direction.**
- In MOA (Article VIII), revise "shallow" and "deep" aquifers to "Upper" and "Lower".
  - **Comment for CC to consider.**

MAJOR COMMENTS FROM CALIFORNIA SPORTFISHING PROTECTION ALLIANCE

- **Water budget: inflow of the land-surface water system does not equal to the outflow of the groundwater system.**
  - Not an error in the water budget and does not have any impact on the calculation of other water budget components, overdraft, or sustainable yield.
  - Due to considering stream-groundwater interaction with the same sign in both the Land-Surface and Groundwater system. Tables and text will be adjusted/corrected to remove confusion.
  - Numbers are balanced, budgets from the model are inherently always balanced (neglecting model computational errors)

MAJOR COMMENTS FROM CALIFORNIA SPORTFISHING PROTECTION ALLIANCE (CONTINUED)

- **The GSP does not identify when and where the depletions of ISW happened and the effects of depletions become significant and unreasonable.**
  - Point to data gaps and GSAs' plan to address data gaps through the continuation of their data-gathering efforts and revise any information or criteria that seem needed upon the availability of additional data.
  - GSAs have followed available guidance and used the best available tools and data at the time of GSP development to address the requirements under SGMA.
  - The analysis and results were presented in the most representative spatial and temporal scale considering data gaps and uncertainties.
  - DWR First ISW Paper:

"[i]t is infeasible to provide details of data and analysis for estimation of depletions of ISW for every time scale and for every location of every surface water body. Thus, water managers need to select spatial and temporal scales appropriate for their basin and the beneficial uses and users that need to be considered. [r]egardless of the approach used to identify ISW, conclusions should be based on the best available science, information, and professional judgment; convey the uncertainty associated with those conclusions; and recommend reasonable approaches to fill identified data gaps."

28

MAJOR COMMENTS FROM CALIFORNIA SPORTFISHING PROTECTION ALLIANCE (CONTINUED)

- **The GSP does not define UR based on SGMA requirements and fails to assess the impacts of pumping on listed species and the ecosystems they rely on. It is not enough to assume that any depletion pre-2015 need not be addressed.**
  - It is important to acknowledge the complexity of an interconnected system such as the San Joaquin River. To assume the GSPs are the primary mechanism for protecting beneficial users impacted by various factors causing the depletion of surface water, one of which is the Basin's pumping, is not supported by SGMA, given the limited authority of GSAs to manage surface water systems.
  - Follows CWC § 10727.2(b)(4)
  - The GSP defines SMC for the chronic lowering of groundwater levels to be equal to groundwater levels experienced in 2015, which is protective for other Sustainability Indicators as the SWRCB noted in its staff letter for Tulare Lake Subbasin.
  - The PRP will ensure that the GSP avoids depletions of ISWs caused by Basin pumping that surpass conditions experienced in 2015.

MAJOR COMMENTS FROM CALIFORNIA SPORTFISHING PROTECTION ALLIANCE (CONTINUED)

- **UR, defined as the exceedance of MTs for two consecutive years, goes against the logic presented by GSP to keep conditions as of 2015.**
  - The 2-year period is considered due to the significant uncertainty in the tools and data used to define SMC.
  - GSP uses the same criteria for Groundwater Levels.
  - Can be revised to a single year, but that can take a way the chance from the GSAs to conduct any meaningful analysis or prevention.
- **The Draft GSP contains no public trust analysis or findings.**
  - The GSAs operate under SGMA and its associated regulations.
  - SGMA clearly outlines a staged process to full compliance with the sustainability criteria by 2040.
  - A clear plan and adaptive management were proposed to prevent undesirable results for beneficial users of surface water caused by the depletion of ISWs due to pumping.
  - This should satisfy SGMA requirements and, correspondingly, consider Public Trust Requirements. 33

MAJOR COMMENTS FROM CALIFORNIA SPORTFISHING PROTECTION ALLIANCE (CONTINUED)

- GSP does not assess the impacts of P/MAs on depletion of ISWs.
  - Del Puerto Creek reservoir project, the diversion of flows to recharge from the Chowchilla Bypass and reactivation of the Aliso Canal, the North Grassland Water Conservation and Water Quality Control Project, Los Banos Creek diversion projects are highlighted.
  - Depletion of ISWs caused by groundwater use is the subject of SGMA.
  - All projects will follow appropriate regulatory and permitting processes prior to implementation
  - It is expected impacts not applicable to SGMA will be addressed under appropriate regulatory programs (Recharge and diversion permitting, CEQA, NEPA, etc.)

MAJOR COMMENTS FROM CALIFORNIA SPORTFISHING PROTECTION ALLIANCE (CONTINUED)

- SJR is listed as impaired for Temperature. GSP needs to discuss and monitor surface water temperature in GSP since depletion of surface water due to pumping impacts temperature.
  - Temperature impairment in SJR is a complex issue, not solely caused by the depletion of ISWs due to groundwater pumping in the Delta Mendota Subbasin and not intended to be resolved under SGMA.
  - Needs to be comprehensively addressed under the appropriate regulatory program (i.e., TMDL).
  - The GSP complies with SGMA requirements by keeping 2015 conditions for ISW.
  - DWR BMPs for SMC and Monitoring Network do not mention that surface water quality monitoring is required or should be considered.

MAJOR COMMENTS FROM FRIANT WATER AUTHORITY(FWA)

- GSP should have a figure or figures that highlight the areas of the DMC that have experienced historical/recent subsidence and these areas should be noted in the narrative text of this section, to the extent information is available.
  - Noted and will be clarified to the extent possible and based on available information. Key maps will be added to figures and GSI report will be attached.
- Additional information should be obtained from the SLDMWA and USBR to establish a baseline condition for the current reductions in the conveyance capacity of the DMC
  - Draft EA/IS provides estimates of the reduction in flow in 2020 from design flows in Figure 2.1. The figure will be included and cited to provide information.

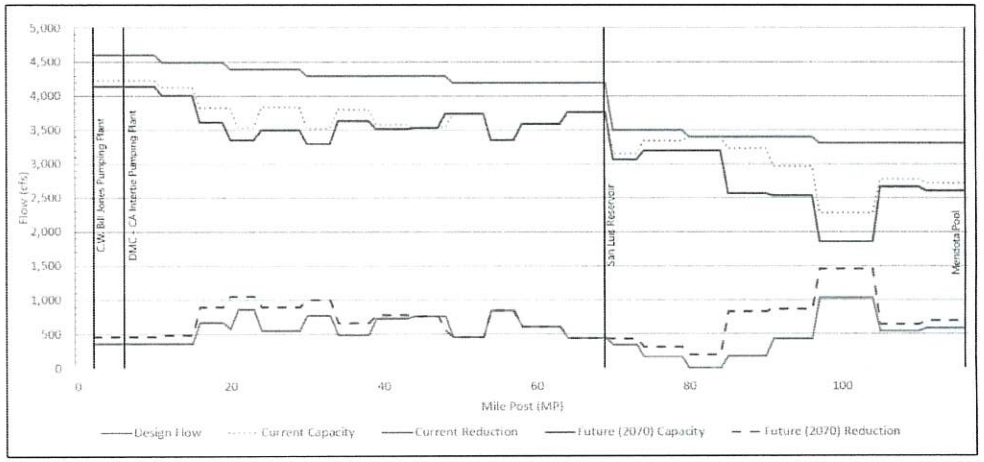

Figure 2-1. Design Flows, Reduction in Flow, and Actual Flow Capacities in the DMC for Current and Future (With Future Subsidence) Conditions

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89

MAJOR COMMENTS FROM FWA (CONTINUED)

- Clarify the scope, status and timing of the proposed DMC capacity correction project and relationship to the proposed subsidence minimum threshold.
  - Noted and will be clarified to the extent possible and based on available information.
- Refine critical infrastructure subsidence management actions and mitigation measures based on further review and reconsideration of the MT for subsidence along the DMC.
  - Comment noted.

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MAJOR COMMENTS FROM FWA (CONTINUED)

- Reconsider the proposal to set a two-foot minimum threshold for land subsidence as applicable to the entire DMC.
- There is circular reference in defining 2 ft subsidence by 2040.
- The project will not be completed soon (probably completed close to 2040), and the 2 ft correction assumed is not supported.
  - 2 ft MT is considered at any location. MT is also defined as rate of subsidence, required by SGMA.
  - 2 ft criteria is not based on a circular reference; the study was done before development of Single GSP.
  - Basin has one of the more stringent subsidence criteria among basins dealing with subsidence. SGMA provides up to 2040 to reach sustainability and considering the correction project that may be implemented close to 2040 is not inappropriate.
  - Significant portion of subsidence is caused by adjacent Basins and takes time to address. Both Chowchilla and Madera also have 2040 as their goal to reach no subsidence.
  - GW level MTs are set at 2015 levels protecting against additional subsidence.
  - Basin has a PRP designed based on GIS report, to proactively address any potential MT and reduce pumping.

MAJOR COMMENTS FROM FWA (CONTINUED)

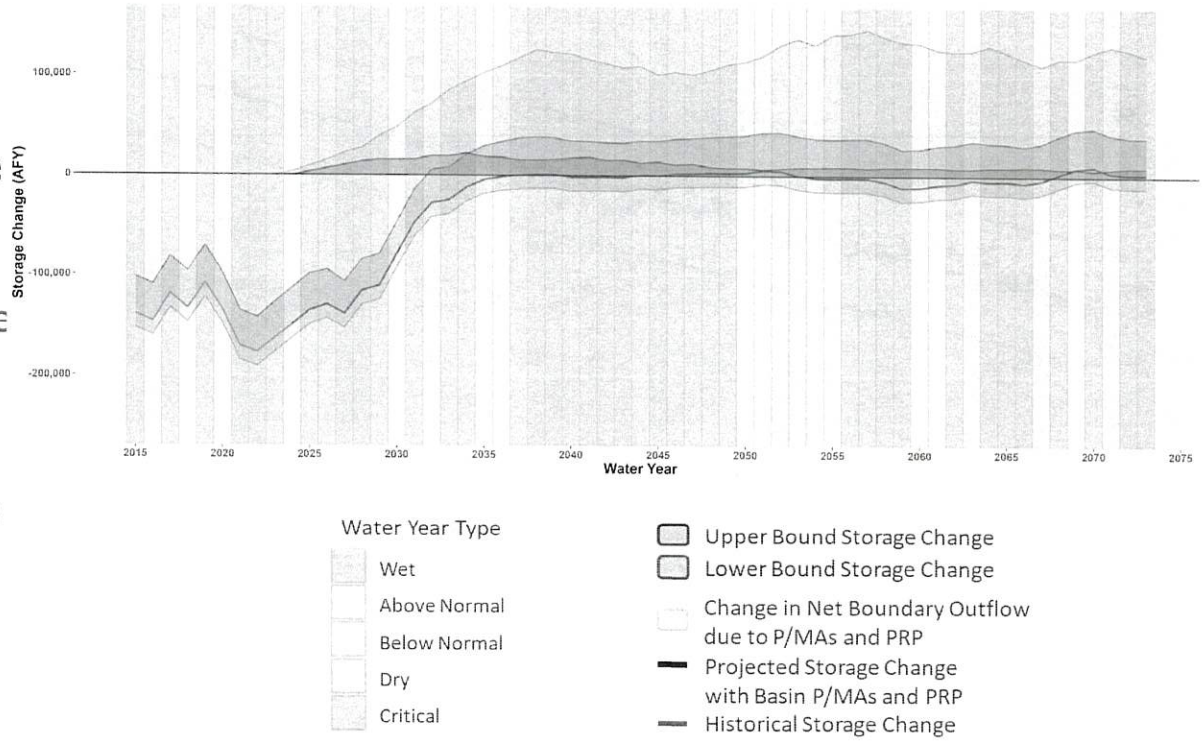
- Refine critical infrastructure subsidence management actions and mitigation measures based on further review and reconsideration of the MT for subsidence along the DMC.
  - Comment noted.
- Refine the proposal to set groundwater level minimum thresholds at or above 2015 groundwater levels
  - Not required based on CWC § 10727.2(b)(4).
- Change subsidence measurement to be based on total subsidence not just inelastic subsidence
  - CC to consider.

PROPOSED GSP REVISION PER SWRCB COMMENTS

- **Water Quality UR: SWRCB is concerned about the three years in the UR definition.**
  - Undesirable Results for Degraded Water Quality are defined to occur within the Basin if and when MTs for a groundwater quality COC are exceeded in 15% of the Representative Monitoring Wells for Degraded Water Quality (RMW-WQs) ~~for three consecutive years~~ in three consecutive semiannual monitoring events and are caused by groundwater management within the Basin.
- **Pumping Reduction Plan: SWRCB is concerned that the GSA-specific PRPs won't be consistent, and the GSAs need 60 days to investigate degraded water quality.**
  - Adjust language to emphasize basin-wide consistency in the PRP.
  - CC to consider review of individual GSA plans

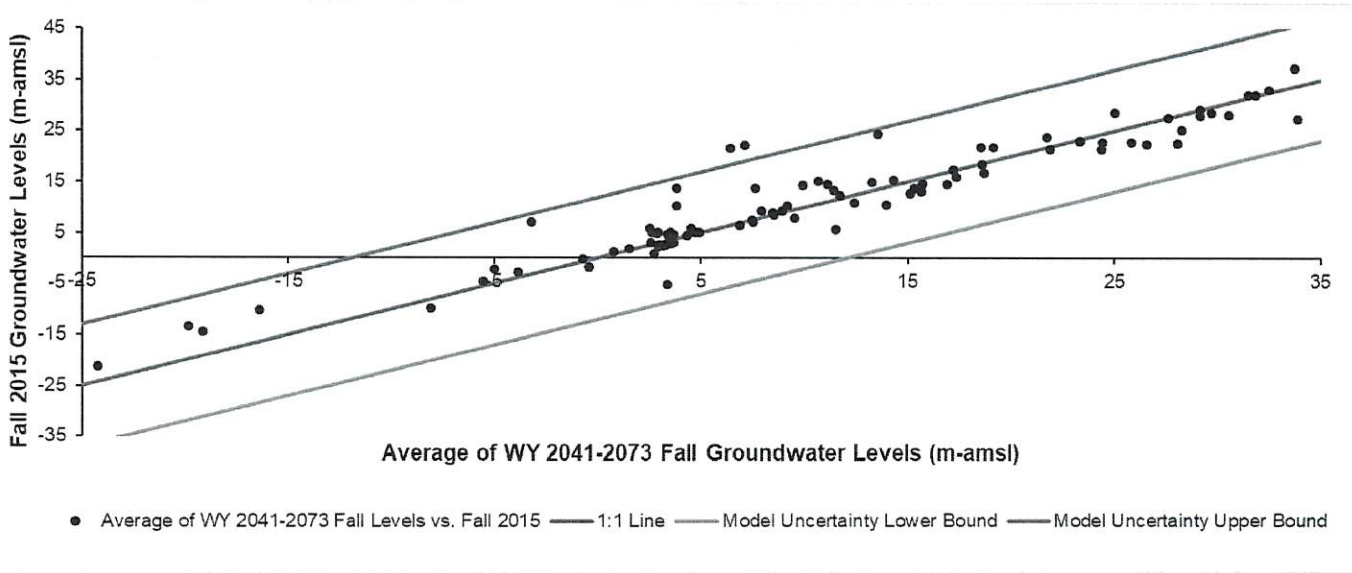
PROPOSED GSP REVISION PER SWRCB COMMENTS (CONTINUED)

- Overdraft mitigation figure: SWRCB is concerned that zero storage change won't be achieved by 2040
  - Add PRP to the plot and storage to reach zero
  - Adjusted figure aesthetic to make the black line less obvious
  - Added additional boundary outflow due to Basin P/MAs to show the significant amount of water supply added to the Basin



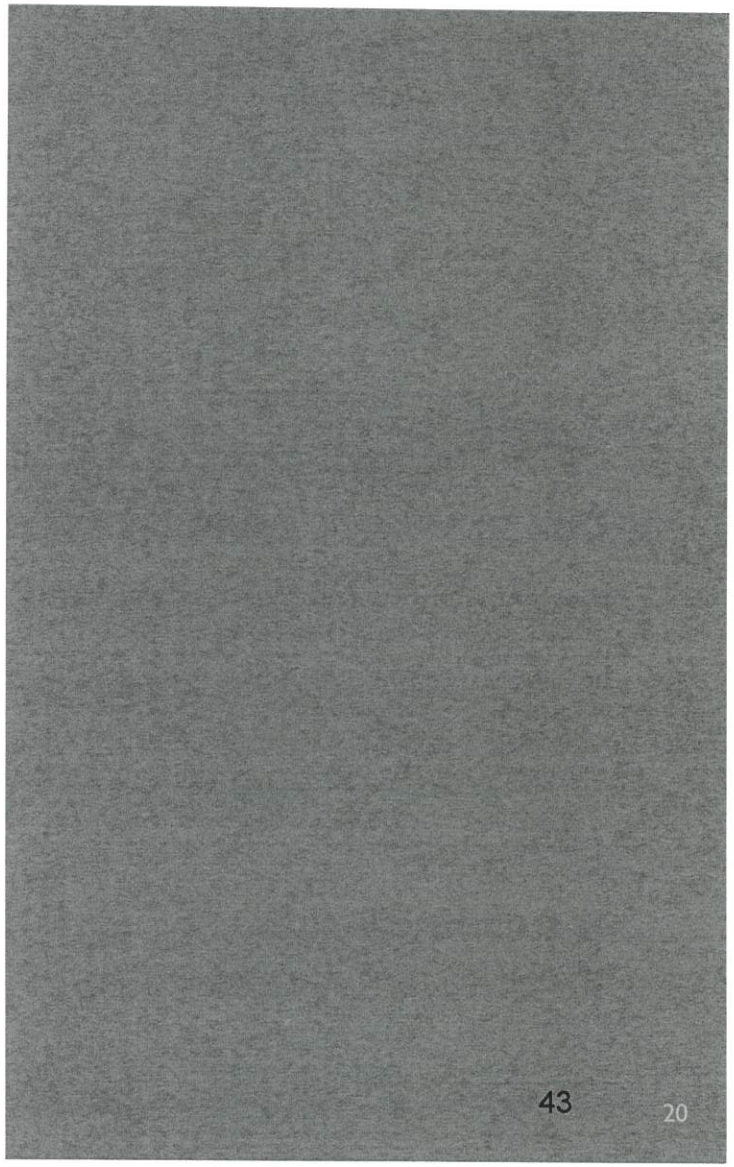
PROPOSED GSP REVISION PER SWRCB COMMENTS (CONTINUED)

- Overdraft mitigation figure: SWRCB is concerned that zero storage change won't be achieved by 2040
- Comparison to 2015 GW levels as discussed in previous CC meeting.
- Confirms sustainability, but may not be helpful to SWRCB



95

BASIN-WIDE PUMPING REDUCTION FRAMEWORK TASKS FOR COMPLETION BY OCTOBER 2024



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OBJECTIVES AND BACKGROUND

- **PRP with detailed policies to be adopted by October 2024 and implemented by January 2025**
- Accomplishing PRP requirements by October 2024 will need intensive coordination and willful cooperation
- PRP needs to include:
  1) Monitoring and Data Collection Plan
     - Sufficient aquifer-specific density, quarterly GWL monitoring, semiannual WQ monitoring
     - Well registration policy adoption (implemented by 2030), aquifer-specific pumping estimation methodology, Metering policy adoption (implementation by Jan 2026)
     - RMW adjustments (information by Jan 2025, remove composites by 2030)
  2) Overdraft Mitigation Plan
     - 20% incremental reduction from 2026 to 2030

97

OBJECTIVES AND BACKGROUND

3) Groundwater Levels MT Avoidance Plan
   - Define triggers, designate hotspots → Define zone and rate of pumping reduction → Preliminary approach discussed
   - Define cross-boundary relationships; define adaptable retraction and snap-back metrics
4) Water Quality MT Exceedance Plan
   - Triggers already set (define statistically significant)
   - Define investigation process and methodology; decision-making, process, and conflict resolution
5) Subsidence Mitigation Plan
   - Critical Infrastructure Component: Triggers already set, define rate and extent of pumping reduction
   - Hotspot Mitigation Component: Trigger already set, define rate and extent of pumping reduction
6) Groundwater Allocation Backstop
   - Triggers already set: define local sustainable yield, detail implementation steps

UMBRELLA APPROACH

Develop Overall Technical Framework

Data and Tools Available and Their Accuracy

Equity and Consistency of Monitoring and Evaluation Methods

Adaptability and Enforceability

Identify Triggers

RMW-based

No ambiguity

Develop Monitoring and Measurement Protocols

Facilitate timely and spatially consistent identification and tracking of triggers

Develop Pumping Reduction Approach

Equitable rate and extent of pumping reduction

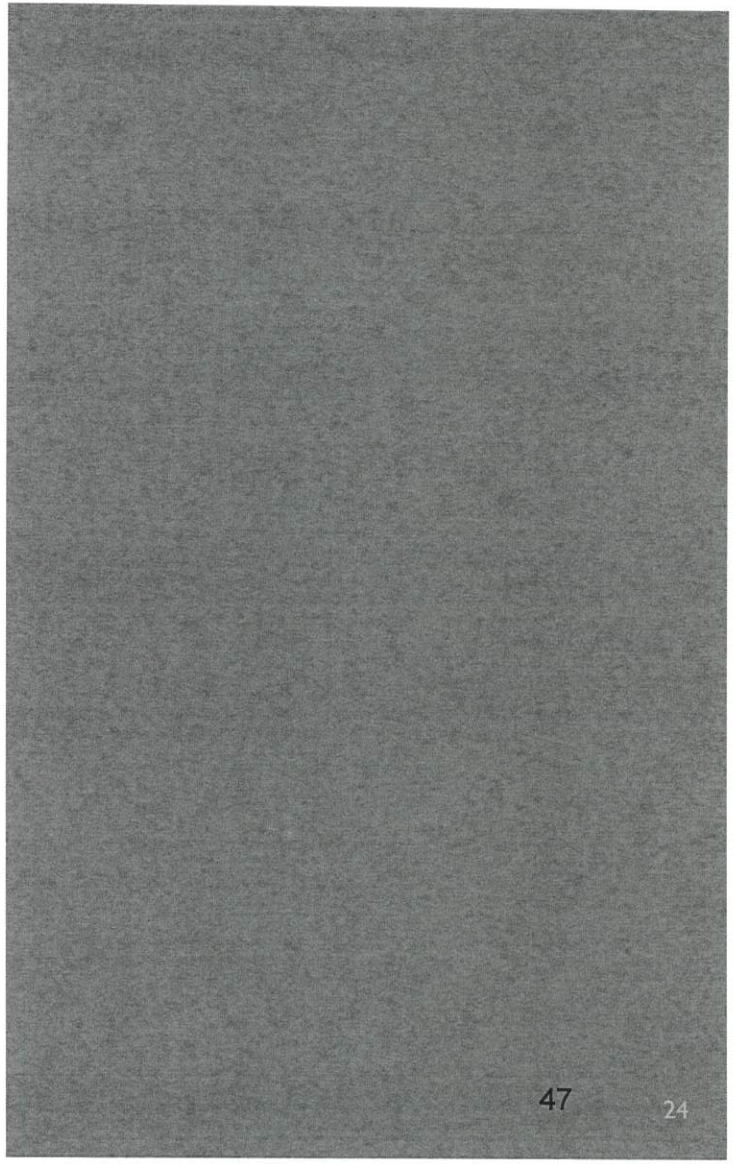
Coordinated within Framework to minimize burden

Tracking and Adaptability Approach

Protocols for enforcements, relief, and adjustments

99

GSP DEVELOPMENT SCHEDULE



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3 MONTH LOOK AHEAD

- July
  - July 8 – CC mtg to review comments/responses
  - July 8 – July 18 – Revised GSP on SharePoint for live edit and review
  - July 19 – Final GSP sent to CC
  - July 22 – CC mtg to approve GSP for finalization (Happy Hour!)
  - By July 31 – GSA Adoption* & Submittal to the SWRCB
  - Summer groundwater level and water quality monitoring
- May – October
  - GSAs develop and adopt policies for implementing Pumping Reduction Plan Framework

ekl

*pending CC decision on July 8th meeting

181

~~DRAFT~~ Delta-Mendota Subbasin Domestic Well Mitigation Policy

Adopted: _____, 202_

The Groundwater Sustainability Agencies (GSAs) in the Delta-Mendota Groundwater Subbasin (Subbasin) have historically worked with disadvantaged communities to improve drinking water access. For example, the San Joaquin River Exchange Contractors have provided drinking water to the City of Dos Palos for nearly 100 years, because groundwater extracted in Dos Palos has historically been too salty for potable use.

Nonetheless, the GSAs realize more must be done to ensure that domestic well users in the Subbasin do not face undesirable impacts from groundwater level depletion during implementation of the Delta-Mendota Groundwater Sustainability Plan (GSP), in compliance with the Sustainable Groundwater Management Act (SGMA).

This Well Mitigation Policy (Policy) was developed by the Coordination Committee for the Subbasin considering recommendations found in the following two public documents: *Framework for a Drinking Water Well Impact Mitigation Program* (Self Help Enterprises, *et al.*) and *Considerations for Identifying and Addressing Drinking Water Well Impacts* (CA Dept. of Water Resources).

Policy Purpose

This Policy will – at minimum – consider impacts to domestic and small community water system wells. Individual GSAs within the Subbasin may consider including additional well uses within their jurisdictional boundaries.

The purpose of the Policy is to mitigate the effects that may be felt by domestic water users whose wells have gone dry or are in imminent threat of going dry due to groundwater levels dropping as a result of groundwater management in the Subbasin.

Pursuant to the single Subbasin Groundwater Sustainability Plan (GSP), Minimum Thresholds (MTs) for lowering of groundwater levels across the Subbasin are set at 2015 seasonal low groundwater levels. This means GSAs in the Subbasin are already committed to maintaining groundwater levels above what was measured in 2015 ("The plan may, but is not required to, address undesirable results that occurred before, and have not been corrected by, January 1, 2015." (CWC §10727.2(b)(4)). Since implementation of the Subbasin's original GSPs began in 2020, GSAs in the Subbasin have been successful in avoiding undesirable results that would occur by water levels dropping below 2015 seasonal lows. This Policy is meant to serve as a last line of defense to protect domestic groundwater users in the unlikely event that the Subbasin GSAs' efforts fail to maintain those groundwater levels above the MTs.

Data from the California Department of Water Resources (DWR) and county records indicates that since 2015, a total of only 37 applications were received by DWR or the applicable county for replacement wells in the Subbasin.[1] No more than two well replacement applications were received in any one year across the entire Subbasin. However, as DWR notes on its website, their data comes from self-reporting on DWR's Dry Well Reporting System, and some GSA representatives receive reports of dry wells directly from users. In these cases, groundwater users were responding directly to GSA representatives, because some GSA members (e.g., water districts and/or irrigation districts) ~~were~~have

Commented [jo1]: I only surveyed the counties for well drilling applications. Some dry wells were reported to DWR, but not all.

[1] California's Groundwater Live: Well Infrastructure (https://sgma.water.ca.gov/CalGWLive/#wells).

102

been engaging in well mitigation activities without formal policies or programs in their individual service areas prior to SGMA's enactment in 2015.

Well replacement applications were identified on the Merced County Environmental Health Department's list of domestic well permits issued for "out of water" or "low water" wells and on Stanislaus County's voluntary well reporting system. The applicable counties reported that there were two well permits identified in the Subbasin portion of Fresno County and zero from the Subbasin portion of Madera County. As mentioned above, it is unknown whether this total number includes any dry wells not reported to DWR.

Merced County permits do not disclose whether or not those reported dry wells were "out of water" due to lowered groundwater levels, collapse or other mechanical failure, or some other reason. Of the 12 well permit applications submitted to the Stanislaus County system ~~from~~ for the Subbasin since 2015, four were reported as dry wells, six were either undefined or outage reports, and two were other issues including well casing failure and/or sediment intrusion. Of the two replacement well permit applications for the Fresno County portion of the Subbasin, one was an agricultural production well, not a domestic supply well. There is no indication of the reason for the well ~~replacements.~~ replacement requests.

In s~~S~~ummary, during the last 10 years, less than 40 wells across the nearly 1,200 square miles of the Subbasin have been reported dry or applied for replacement. Though it is known that not all of those were drinking water wells, the exact number of drinking water wells replaced since 2015 is unknown due to a lack of information collected on the replacement well permit applications.

Policy Eligibility

This Policy primarily applies to landowners using groundwater for domestic health and safety supply purposes as of _____, 2024, the date the revised Subbasin GSP was adopted. Though owners of all types of wells are eligible to file for relief under the Policy, relief is not guaranteed and will be subject to analysis by the applicable GSA where a claim for relief is filed and pursuant to the provisions of Executive Order N-3-23. Well owners must participate or agree to participate in a GSA's Well Registration Policy/Program to be eligible for mitigation, if such a policy exists or is developed.

This Policy does not apply to wells installed after the date of GSP adoption, if the well(s) is/are installed at a screen interval depth shallower than minimum threshold levels as designated by the applicable GSA as part of the GSA's required review of well permit applications under state law.

Public Outreach

Initial stakeholder outreach was conducted during the development of the Policy and the Subbasin single GSP. The Policy was discussed in open and public meetings of the various GSAs, at open and public meetings of the Coordination Committee, and at open and public meetings of individual GSA or GSA Group meetings in the Subbasin. A draft of the Policy was posted to the Subbasin's SGMA website (www.deltamendota.org) as both a separate item and as a part of the draft single GSP. The public was able to submit written comments on the Policy and the single GSP through the website.

This Policy was discussed during (x) public meetings designed to secure input on both the Policy and the single GSP. Both verbal and written comments were accepted at the meetings. The comments received were summarized and published on the Subbasin website. Finally, comments on the Policy, as well as responses from the Subbasin Coordination Committee, were addressed in the adopted single GSP, which contains the adopted Policy.

Discussion of the Policy status and implementation will be placed on the Subbasin Coordination Committee meeting agendas no less than quarterly during ~~the first year of single~~ GSP implementation.

103

Similarly, the Policy may be placed on each of the Subbasin GSAs' governing bodies' agendas at least semi-annually during the first year of single GSP implementation. The Policy will be available on the Subbasin SGMA website with relevant information such as electronic instructions for filing an application and a form to submit the application electronically via the website. GSAs may place the Policy on their own websites or have a link on their websites that directs interested persons to the Subbasin SGMA website.

As part of the GSP Adaptive Management Framework (see Appendix X, the Delta-Mendota Subbasin MOA, Exhibit "C" at www.deltamendota.org), the Subbasin Coordination Committee will review groundwater level readings at least twice annually during a regularly scheduled public meeting. In the unlikely event a groundwater level reading at a representative monitoring well (RMW) gets to within ten percent (10%) of its minimum threshold (MT), GSAs may contact well users/owners within a one quarter (1/4) mile radius of the RMW to begin collecting well data in the event a well goes dry to expedite the mitigation process described below. Each GSA may develop criteria, a notification method, and protocols to address such situations within its jurisdictional boundaries. A ~~The~~ one quarter (1/4) mile radius was selected because it is consistent with the distance used as a part of the Subbasin's pumping reduction strategy for subsidence mitigation.

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For example, if the MT of an RMW well is 100 feet below ground surface (bgs), and a September well level measurement returns a reading of 90 feet bgs, the GSA may post information to its website that domestic well owners in a specific area may be affected. By internal policy, the GSA may also send postcard mailings to known domestic well owners within a one quarter (1/4) mile radius of the RMW. If the RMW is near the jurisdictional boundary between two or more GSAs, the GSA where the well is physically located will notify the adjacent GSA(s) of the potential impact to well owners located in that adjacent GSA's jurisdictional area. The GSAs will cooperate according to the terms of the Adaptive Management Framework in the Subbasin MOA on any costs associated with notification.

Any notification provided to well users/owners pursuant to the above will include information on this Policy and how and where to file a claim for mitigation. Other information that may be included and/or requested in the notification will be determined by the individual GSAs.

Plan Area

For a full description of the Subbasin Plan Area, please refer to GSP Chapter 5, which may also be found at www.deltamendota.org.

Well Completion Report (WCR) records compiled by DWR indicate an estimated 2,295 domestic wells, 81 public supply wells, and 514 other production wells are located in the Subbasin as of the date this Policy is adopted. This DWR dataset is known to have limitations, but is accepted as a conservative estimate of the number of wells installed within the Public Land Survey System (PLSS) sections that fall within the Subbasin. ~~For example~~ Additionally, this Policy recognizes that it is likely that wells included in DWR's WCR data set:

- May not currently be in use;
- Are inaccurately located; and/or
- Have inaccurate well construction and/or destruction information.

Given these assumptions and limitations, for the purposes of this Policy, the Coordination Committee conservatively estimates that there are 2,890 wells in the Subbasin as of the date of Policy adoption. From 2015 to ~~As of~~ the adoption date of this Policy, there have been only 37 known applications for replacement wells in the Subbasin ~~since 2015~~. It is unknown whether those wells were replaced due to dewatering from over-pumping, mechanical failure, or other reasons.

104

Monitoring Network

There are 110 wells in the representative monitoring network for the Subbasin, which the GSAs use to monitor groundwater levels. Of those, 60 wells are in the upper aquifer and 50 wells are in the lower aquifer. Most rural domestic drinking water wells are assumed to be in the upper aquifer, while most municipal, and small water system supply wells are assumed to be in the lower aquifer. Agricultural wells are known to be in both the upper and lower aquifers, with some being "composite" wells (with screen intervals in both the upper and lower aquifers).

The distribution of domestic supply wells across the Subbasin and distribution of the Subbasin's monitoring network wells provide a suitable framework for evaluating the potential for domestic supply wells to become dewatered due to lowering of groundwater levels. As previously noted in the "Public Outreach" section of this Policy, the Coordination Committee reviews possible MT exceedances or trends in the representative monitoring network. This will help GSAs avoid potential dewatering of domestic wells within their boundaries.

Using a ~~Stochastic~~ stochastic predictive modeling process to assess potential well impacts and current MT (2015 water levels) exceedances at 25% of representative monitoring wells, the Subbasin ~~would see~~could potentially experience 28 total "production" wells dewatered. That leads to an estimated average of three drinking water wells per year *across the Subbasin* during implementation of the GSP through 2040. This estimation supports the approximate current number of replacement well permit applications identified in records from the counties in the Subbasin.

Well Mitigation Process

GSAs will conduct public education and outreach to notify landowners as to how and where to file an application for assistance, and the information that the GSA will require to evaluate the mitigation application. Copies of the application form will be included with education and outreach materials. GSAs may, at their own discretion, require a reasonable application fee to pay for the processing ~~and evaluation~~ of any claim. The application fee may be reimbursed or applied to any costs that may be deemed the responsibility of the well owner from a successful claim.

Upon receiving a completed application, the receiving GSA, or its representative, will conduct a preliminary review of the application ~~within ten (10) business days~~ to determine completeness. The applicant will be notified within ~~that time period~~two (2) business days, in writing, if the application is complete or if there is any further information needed to evaluate the application. If deemed complete and appearing to meet all the requirements to receive assistance, the receiving GSA will provide a short-term emergency water supply to domestic well users as soon as reasonably possible, but in all cases within ~~ten (10)~~two (2) business days of submission of a complete application, if data suggests a domestic supply well has been de-watered due to extraction ~~by one or more GSAs~~ in an area of influence. Short term emergency water supplies shall consist of the delivery of bottled water or water tanks (at the GSA's discretion) ~~and~~, after a site investigation, ~~and/or water tanks at the GSA's discretion, after site investigation, on a case-by-case basis.~~ The GSAs also commit to work with Self Help Enterprises, or similar entities, to assist with the feasibility of providing water tanks.

The short-term emergency water supply will be provided by the GSA at the location of ~~where~~ the de-watered well ~~is located~~. The GSA in which the well is located will be responsible for providing the short term emergency water supply and the costs for~~of~~ the investigation. However, ~~I~~f it is determined through the Adaptive Management Framework process (Delta-Mendota Subbasin MOA, Article VII, Article X, Article XIII, and/or Exhibit "C") that over-pumping is the result of another GSA or another well -owner, the GSA that paid for the emergency water supply ~~will~~ may seek~~be~~ reimbursement~~ed~~ from that third party for the short-term emergency water supply provided. ~~If a field investigation (see below) proves that the~~

Commented [jo2]: Are GSAs really going to commit to responding in writing? Is this a requirement of SRCB staff?

Commented [vl3R2]: I agree, I think its good that we keep it in writing for record keeping purposes. But maybe we just communicate via the method the well owner prefers like phone, mail or email, outside of something crazy like telegraph via horse or smoke signals.

Commented [vl4]: When we state data suggest it has been dewatered due to extraction, are we referring to the data in a preliminary review? We may want to better define what data. I feel that the SWRCB may get upset if we state that we haven't seen declining water levels, sorry you're on your own.

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Commented [JM5]: This will be a red flag to the staff. Let's think about how much $ is at risk. We should be able to cover the cost of bottle water for a few days until we can check water levels. I suggest striking the reference of us seeking reimbursement. If we can make it clear that a GSA will seek reimbursement only from another GSA that should work.

Commented [vl6R5]: I agree, just between the GSA's.

105

~~well failed for reasons other than de-watering due to decreased water levels from groundwater extraction, the GSA may seek reinbursement of short-term water supply expenses from the well owner.~~

The GSAs may request a professional well assessment report including, but not limited to: age of the well; well construction information (including pump depth, screening intervals, and pipe type [material]) and thickness; well maintenance information; indication of past well performance and any recent performance changes; any recent changes in well use or related land use; and, other additional information as necessary to determine if the failure is caused by declining water levels and/or GSA groundwater management actions.

Commented [vl7]: Who are we requesting this report from? Would it sound better if we may develop? Or is this request directed to the well owner?

The GSA's preliminary review of a well mitigation application may consist of some or all of the following:

- A review of well construction information,
- A review of well and pump maintenance records,
- A review of historic water level data for nearby representative monitoring network wells,
- A review of nearby known production well information,
- A review of nearby land use and any recent land use changes, and or
- An analysis of nearby conjunctive use activity (if known).

If the nearest representative monitoring network well does not represent water level data that can be used as evidence for consideration of ~~similarities to~~ the applicant's ~~well~~ claim ~~and land use~~, a GSA may review additional data from other wells in the monitoring network, supplemental data from DWR and local agencies to support the preliminary review analysis.

If, after completion of the preliminary review, a GSA determines a well may be eligible for mitigation, the GSA will perform a field investigation. To be eligible for mitigation assistance, the applicant must consent to the field investigation/inspection and execute an appropriate release with the GSA. Failure to consent to the field investigation/inspection and/or execute an appropriate release voids the application for mitigation. The field investigation may include, but is not limited to:

- ~~Testing~~Measuring water levels~~level~~ ~~measurements~~ in the applicant's well and in representative monitoring wells in the area;
- Removing a pump to measure intake depth, well bottom, and static water level,
- Conducting a video log,
- Modifying the wellhead to measure static and pumping level,
- Investigating the site for consolidation feasibility, and or
- Investigating nearby land and water use.

Commented [JM8]: Can we articulate this as Step 1 and will be covered by the GSA's and not the landowner. The subsequent steps will be dependent on the results of Step 1.

Commented [vl9R8]: I agree, put this in the preliminary assessment, the first step would first to review nearby representative monitoring wells and then to measure levels in this well.

The field investigation may show the well as ineligible for mitigation. Such criteria indicating ineligibility include, but are not limited to:

- Pump failure,
- Clogged screens,
- Well pipe and/or casing failure or collapse which are unrelated to lowering groundwater levels or other potential GSA actions,
- Other maintenance-related well or pump issues which are unrelated to lowering of groundwater levels or other potential GSA actions, or
- Normal wear and tear based on the age of the well.

The GSA will notify the applicant, in writing, if the well is ineligible for mitigation. This finding will also be included in the Subbasin's annual report.

Commented [jo10]: See previous comment about notification in writing.

106

If the applicant desires to appeal the results of the GSA's investigation, the applicant may do so in writing to the Delta-Mendota Subbasin Coordination Committee. The Coordination Committee shall create an ad hoc committee of no more than three members to review the GSA's written investigation, obtain additional data if necessary, and either (a) confirm the findings of the GSA, (b) provide guidance to the GSA and request further review by the GSA, or (c) propose to the Coordination Committee that it adopts its own findings. If the Coordination Committee chooses to adopt its own findings and recommendations, those shall be binding upon the GSA, to the extent allowed by the Memorandum of Agreement. ~~If the well is ineligible for mitigation, the well owner shall reimburse the GSA for reasonable field investigation expenses over and above the application fee amount.~~

If, after the field investigation, a GSA determines a well is eligible for mitigation, the GSA will work with the well owner/landowner on a solution appropriate for the site (each, a "Mitigation Measure"). Such Mitigation Measures may include, but are not limited to, the following:

- Lowering the well pump or otherwise modifying pump equipment,
- Deepening the well if the existing well has an open bottom,
- Installing a new well,
- Assisting landowner with facilitating a connection to an existing municipal or community water system or other water supply, if feasible, or
- Other appropriate mitigation as may be agreed to by both parties.

If the applicant disagrees with the proposed Mitigation Measure(s), a technically qualified third party agreed to by the GSA and applicant may facilitate and recommend a mutually agreeable Mitigation Measure(s). The GSA has the right to identify which Mitigation Measure(s) is optimal on a case-by-case basis. The technically qualified third party's role is to provide a recommendation. The appropriate GSA Board and/or Manager shall approve the application before any well mitigation (other than provision of emergency drinking water) begins.

The applicant must sign a Mitigation and Indemnification (MI) Agreement prior to the GSA commencing the Mitigation Measure. Terms of the MI Agreement will depend on the nature of the Mitigation Measure provided. New wells will be required to meet state and county well drilling standards and comply with Executive Order N-3-23. In order to be eligible for mitigation from a GSA, the MI agreement may stipulate minimum criteria in addition to state and county requirements for new wells as they apply to GSA review and the opinion granted under EO N-3-23. Criteria may include well construction materials, minimum depth beyond 2015 seasonal low groundwater level measurements, and/or screening interval levels, among other potential criteria.

At its discretion and in the event a new well is installed as mitigation for a failed well, the GSA may choose to convert the abandoned well into a monitoring well. Such provision(s) may be included in the MI Agreement and agreed to by both parties. In such a case, t~~T~~he MI Aagreement shall grant access by the property owner to the GSA ~~to~~ for the monitoring well for SGMA data gathering and compliance activities, and ownership of the abandoned and converted monitoring well will revert to the GSA. Terms and conditions for access to the monitoring well may be negotiated between the GSA and the well's former owner.

If the well will be abandoned and not converted to a monitoring well under SGMA, the cost for sealing/destroying the well shall be ~~negotiated between~~borne by the GSA ~~and the well owner and may be included in the MI Agreement~~as part of the mitigation.

Commented [JM11]: The staff wants this. I am not sure if the CC is okay with paying to abandon a well even if the well failed for reasons other than low water levels. I recommend adding some minor clarifying language.

107

Funding

GSAs in the Delta-Mendota Subbasin desire to mitigate/compensate for legitimate impacts resulting from GSA management actions failingfailure to maintain water levels at or above 2015 seasonal lows. As noted in the "Plan Area" section of this Policy, a total of only 37 replacement well applications were received by counties in the Subbasin since 2015. However, it is unknown how many of those wells, if any, of those wells were dewatered due to the groundwater levels falling below 2015 seasonal low levels, or how many of those are wells for domestic use.

Individual GSAs will fund the mitigation of wells within their boundaries, upon determining whether inMitigation Measures pursuant to under this Policy is are appropriate and justified as detailed in the "Well Mitigation Process" section. In some cases, where historical wells are impacted, adjustments may be made for equipment depreciation. All costs to mitigate claimed impacts at a well site will be initially allocated to the applicable GSA where the well is located.

In the event of interbasin or intra-basin disagreements for determining responsibility for dewatering of a domestic well, Subbasin GSAs shall follow the Adaptive Management Framework processes as outlined in the executed MOA, including Article VII, Article X, Article XIII, and/or Exhibit C therein.

Upon completion of the Mitigation, any adjustments (i.e., depreciation, etc.) to mitigation costs over and above the amount of the application filing fee shall be repaid to the GSA by the well owner. If there are no adjustments to mitigation costs, the well owner may be refunded the unexpended portion of the application filing fee.

Though the Stochastic stochastic predictive modeling indicates no more than three domestic wells in the Subbasin will be dewatered annually due to groundwater management activities, GSAs in the Subbasin will establish a common financial account sufficient to annually mitigate ten (10) domestic wells. A limit of tTen (10) wells annually was selected. because it reflects that is the undesirable result for lowering of groundwater levels in the GSP.

Not all GSAs in the Subbasin have domestic wells located within their jurisdictional areas. However, the seven GSA groups that are represented on the Coordination Committee agree to equally fund a common account to a total of $300,000.[2] Costs to fund this reasonably prudent reserve will be split based on Coordination Committee costs identified in the MOA and will be funded over three years (i.e. $100,000 per year, until the fund reaches $300,000). Funds from the common financial account may be used only for well constructionapproved Mitigation Measure costs. GSAs receiving funds will be required to repay the total amount withdrawn. The maximum amount of funding available for a single well from the common account is $30,000.

Subject to the provisions in the previous section (Well Mitigation Process), individual GSAs will be responsible for all other costs for implementing this Policy, including but not limited to: preliminary review, a professional well assessment report, a field investigation, and/or emergency water supply expenses. Specific escrow instructions for use of the common account will be developed.

Other Resources

If an application requires immediate action, qualifies only for partial mitigation, or receives no mitigation by a GSA, there are other programs that may assist well owners, especially for rural domestic/*de minimus* wells.

[2] Recent (5/2/2024) cost estimates for domestic well replacement vary from a low of less than $15,000/well up to $30,000/well.

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180

- Self Help Enterprises has a water sustainability program that includes tank water access, domestic well repair or replacement, and water system connections. Their services are free, based on income eligibility and other qualifications. They may be contacted at 1-559-802-1865 or visit their website at https://www.selfhelpenterprises.org/programs/emergency-services/water-sustainability/.
- California's Office of Emergency Services recommends residents contact their County Office of Emergency Services to begin the process of seeking assistance with drinking water wells that go dry.
- The State Water Resources Control Board manages the Safe and Affordable Funding for Equity and Resilience ~~or~~ (SAFER) Program. The SAFER Program provides assistance with interim drinking water supplies, emergency repairs, technical assistance, administrators, planning, operations and maintenance and construction projects via various funding sources.
- Additionally, the GSAs in the Subbasin will commit to working with the existing water quality coalitions and local and state~~drainage~~ authorities to provide available resources~~support~~ to domestic well owners whose wells are negatively impacted by water quality degradation or water level declines that are ~~not related to~~ a result of GSA management activities.

Summary

This Well Mitigation Policy formalizes a process that landowners and GSAs in the Subbasin have voluntarily subscribed to, in some cases for over 100 years. GSA members do not want the wells of their constituents, employees, neighbors, friends, and families to go dry. That is why GSAs in the Subbasin are committed to keeping groundwater levels above 2015 historic low levels.

This Policy describes the process well owners can follow to apply for mitigation/assistance if their wells go dry due to groundwater management under SGMA. It specifies the process GSAs across the Subbasin may follow if there are indications that a representative monitoring well is nearing minimum thresholds, and the process GSAs and well owners will follow in the event a drinking water well goes dry.

As previously noted, since 2015, only 37 replacement well applications were received across the Subbasin. County records do not indicate whether wells were replaced due to groundwater levels falling or for other reasons. GSAs in the Subbasin are committed to eliminating the need for this Policy by maintaining groundwater levels above 2015 thresholds and managing the Subbasin's groundwater sustainably.

Domestic well owners are encouraged to be aware of information on local groundwater conditions as provided by local GSAs and the State of California. In particular, DWR has a website dedicated to keeping domestic well owners informed about resources needed to maintain and protect domestic water supply. This includes information about well maintenance and other assistance via DWR's "Be Well Prepared" website, which can be found at the following link: Be Well Prepared (ca.gov) ~~Be Well Prepared (ca.gov)~~

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The Subbasin Coordination Committee shall review this Policy at least every five years.

104

Fund 64 FY 2025 Budget with EKI Table 1 Added

EXPENDITURES			
Legal:			
Baker Manock & Jensen	$ 25,800	$ 43,000	$ 27,600
Other Professional Services:			
Contracts	$ 419,830	$ 319,830	$ 352,066
Other:			
Executive Director	$ 394	$ 394	$ 456
General Counsel	$ 5,652	$ -	$ 6,696
Water Policy Director	$ 8,236	$ 4,500	$ 9,802
Water Resources Program Manager	$ 70,200	$ 60,000	$ 83,700
Accounting	$ 2,808	$ 1,500	$ 4,576
Hydrotech 3	$ 23,712	$ 20,000	$ 23,712
Los Banos Administrative Office (LBAO)	$ -	$ -	$ -
License & Continuing Education	$ 250	$ 250	$ 250
Conferences & Training	$ 1,250	$ 1,250	$ 1,250
Travel/Mileage	$ 2,500	$ 2,500	$ 2,500
Group Meetings	$ 500	$ 500	$ 500
Telephone	$ 1,250	$ 1,250	$ 1,250
Equipment and Tools	$ -	$ 500	$ -
Software	$ -	$ -	$ -
EKI PRP Tasks Table 1			$ 131,000
Total Expenditures	$ 562,382	$ 455,474	$ 645,358
REVENUES			
Fund Balance	$ 639,381	$ 1	$ (636,766)
Other Revenues	$ -	$ 58,764	$ -
Membership Dues	**$ (76,999)**	$ 59,943	**$ 1,282,124**
Total Revenues	$ 562,382	$ 118,708	$ 645,358

FUND BALANCE:			
End of FY 23 (Budget Estimated)	$ 939,381		
End of FY 23 (Unaudited)		$ 1	
End of FY 24 (Budget Estimated)	$ -		
End of FY 24 (Estimated)			$ (336,766)
Reserved for 5 year update on GSP			$ 300,000
End of FY 25 (Estimated)			$ -
		Available/(Required)	**$ (636,766)**

PRIOR YEAR:	**FY22**	**FY23**	**FY24**	**FY25**
BUDGET	**$ 649,812**	**$ 779,145**	**$ 562,382**	**$ 645,358**
MEMBERSHIP DUES	**$ 649,812**	**$ 59,944**	**$ (76,999)**	**$ 1,282,124**

* Includes $100k for 2025 Update reserve

110

Fund 64 FY 2025 Cost Sheet Original

FY24 Projections & FY25 Budget Draft
FAC/WRC/BOD Workshop 12/19/23

	GSA Acreage to Allocate Costs	*% of Northern Region Acreage*	TOTAL SGMA	Other Professional Services	Equal Split between # of GSAs	Authority & Legal
			$ 1,151,124	$ 897,877	% 5	$ 253,247
DIVISION 1						
1. Banta-Carbona ID		0.00000%	$ -	$ -	0.00000%	$ -
2. City of Tracy		0.00000%	$ -	$ -	0.00000%	$ -
3. Del Puerto Water District (DPWD 52,570 ac + Oak Flat 4,503 ac)	57,073	35.61387%	$ 370,418	$ 319,769	20.00000%	$ 50,649
3A. Del Puerto (92% of DPWD GSA Cost)			*$ 340,784*			
3B. Oak Flat (8% of DPWD GSA Cost)			*$ 29,633*			
4. Patterson Irrigation District (PID 13,067 ac + Twin Oaks 2,629 ac)	15,696	9.79439%	$ 138,591	$ 87,942	20.00000%	$ 50,649
5. Byron Bethany Irrigation District (2020 absorbed West Side ID)		0.00000%	$ -	$ -		
6. West Side Irrigation District		0.00000%	$ -	$ -	0.00000%	$ -
7. West Stanislaus ID (WSID 21,299 ac + Grayson/Westley 246 ac)	21,545	13.44420%	$ 171,362	$ 120,712	20.00000%	$ 50,649
Total Division 1	**94,314**	58.8525%	**$ 680,371**	$ 528,423	**60.00000%**	$ 151,948
DIVISION 2						
1. Panoche Water District		0.00000%	$ -	$ -		
2. San Luis Water District		0.00000%	$ -	$ -		
3. Westlands Water District (1)		0.00000%	$ -	$ -		
4. Charleston Drainage District		0.00000%	$ -	$ -	0.00000%	$ -
5. Panoche Drainage District		0.00000%	$ -	$ -	0.00000%	$ -
6. Pleasant Valley		0.00000%	$ -	$ -	0.00000%	$ -
Total Division 2	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
DIVISION 3						
1. Central California Irrigation District**		0.00000%	$ -	$ -	0.00000%	$ -
2. Firebaugh Canal Water District**		0.00000%	$ -	$ -	0.00000%	$ -
3. Grassland Water District		0.00000%	$ -	$ -	0.00000%	$ -
4. HMRD #2131**		0.00000%	$ -	$ -	0.00000%	$ -
5. Columbia Canal Company (Friend Member)**		0.00000%	$ -	$ -	0.00000%	$ -
6. Camp 13 Drainers		0.00000%	$ -	$ -	0.00000%	$ -
Total Division 3	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
DIVISION 4						
1. San Benito County Water District			$ -	$ -	0.00000%	$ -
2. Valley Water District (2)			$ -	$ -	0.00000%	$ -
Total Division 4	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
DIVISION 5						
1. Broadview Water District		0.00000%	$ -	$ -		
2. Eagle Field Water District	0	0.00000%	$ -	$ -		
3. Fresno Slough WD** -withdrew 8/31/11	0	0.00000%	$ -	$ -	0.00000%	$ -
4. James Irrigation District**		0.00000%	$ -	$ -	0.00000%	$ -
5. Laguna Water District		0.00000%	$ -	$ -		
6. Mercy Springs Water District	0	0.00000%	$ -	$ -		
7. Oro Loma Water District	0	0.00000%	$ -	$ -	0.00000%	$ -
8. Pacheco Water District	0	0.00000%	$ -	$ -		
9. Reclamation District 1606**		0.00000%	$ -	$ -	0.00000%	$ -
10. Tranquillity ID** -withdrew 8/31/11	0	0.00000%	$ -	$ -	0.00000%	$ -
11. Turner Island Water District	0	0.00000%	$ -	$ -	0.00000%	$ -
Total Division 5	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
OTHER						
1. Northwestern Delta Mendota Subbasin GSA (Stan. Cty 56,766 ac + Merced Cty 3,035 ac)	59,801	37.31615%	$ 385,702	$ 335,053	20.00000%	$ 50,649
1a. Merced County (5% of Northwestern DM GSA Cost)			*$ 4,253*			
1b. Stanislaus County (95% of Northwestern DM GSA Cost)			*$ 80,798*			
2. City of Patterson GSA	6,140	3.83139%	$ 85,051	$ 34,401	20.00000%	$ 50,649
3. Fresno County	0	0.00000%	$ -	$ -	0.00000%	$ -
4. Merced County	0	0.00000%	$ -	$ -	0.00000%	$ -
5. Santa Nella County Water District	0	0.00000%	$ -	$ -		
6. Widren GSA	0	0.00000%	$ -			
Total Other	**65,941**	41.14755%	**$ 470,753**	$ 369,454	**40.00000%**	$ 101,299
	160,255	**100.00%**	**$ 1,151,124**	$ 897,877	100.00%	$ 253,247

Fund 64 FY 2025 Original Cost Sheet with EKI Table 1 Costs Added

FY24 Projections & FY25 Budget Draft
FAC/WRC/BOD Workshop 12/19/23

	GSA Acreage to Allocate Costs	% of Northern Region Acreage	TOTAL SGMA	Other Professional Services	Equal Split between # of GSAs	Authority & Legal
			$ 1,282,124	$ 1,000,057	%	$ 282,067
DIVISION 1						
1. Banta-Carbona ID		0.00000%	$ -	$ -	0.00000%	$ -
2. City of Tracy		0.00000%	$ -	$ -	0.00000%	$ -
3. Del Puerto Water District (DPWD 52,570 ac + Oak Flat 4,503 ac)	57,073	35.61387%	$ 412,572	$ 356,159	20.00000%	$ 56,413
3A. Del Puerto (92% of DPWD GSA Cost)			*$ 379,566*			
3B. Oak Flat (8% of DPWD GSA Cost)			*$ 33,006*			
4. Patterson Irrigation District (PID 13,067 ac + Twin Oaks 2,629 ac)	15,696	9.79439%	$ 154,363	$ 97,949	20.00000%	$ 56,413
5. Byron Bethany Irrigation District (2020 absorbed West Side ID)		0.00000%	$ -	$ -		
6. West Side Irrigation District		0.00000%	$ -	$ -	0.00000%	$ -
7. West Stanislaus ID (WSID 21,299 ac + Grayson/Westley 246 ac)	21,545	13.44420%	$ 190,863	$ 134,450	20.00000%	$ 56,413
Total Division 1	**94,314**	58.8525%	**$ 757,798**	$ 588,558	**60.00000%**	$ 169,240
DIVISION 2						
1. Panoche Water District		0.00000%	$ -	$ -		
2. San Luis Water District		0.00000%	$ -	$ -		
3. Westlands Water District (1)		0.00000%	$ -	$ -		
4. Charleston Drainage District		0.00000%	$ -	$ -	0.00000%	$ -
5. Panoche Drainage District		0.00000%	$ -	$ -	0.00000%	$ -
6. Pleasant Valley		0.00000%	$ -	$ -	0.00000%	$ -
Total Division 2	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
DIVISION 3						
1. Central California Irrigation District**		0.00000%	$ -	$ -	0.00000%	$ -
2. Firebaugh Canal Water District**		0.00000%	$ -	$ -	0.00000%	$ -
3. Grassland Water District		0.00000%	$ -	$ -	0.00000%	$ -
4. HMRD #2131**		0.00000%	$ -	$ -	0.00000%	$ -
5. Columbia Canal Company (Friend Member)**		0.00000%	$ -	$ -	0.00000%	$ -
6. Camp 13 Drainers		0.00000%	$ -	$ -	0.00000%	$ -
Total Division 3	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
DIVISION 4						
1. San Benito County Water District			$ -	$ -	0.00000%	$ -
2. Valley Water District (2)			$ -	$ -	0.00000%	$ -
Total Division 4	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
DIVISION 5						
1. Broadview Water District		0.00000%	$ -	$ -		
2. Eagle Field Water District	0	0.00000%	$ -	$ -		
3. Fresno Slough WD** -withdrew 8/31/11	0	0.00000%	$ -	$ -	0.00000%	$ -
4. James Irrigation District**		0.00000%	$ -	$ -	0.00000%	$ -
5. Laguna Water District		0.00000%	$ -	$ -		
6. Mercy Springs Water District	0	0.00000%	$ -	$ -		
7. Oro Loma Water District	0	0.00000%	$ -	$ -	0.00000%	$ -
8. Pacheco Water District	0	0.00000%	$ -	$ -		
9. Reclamation District 1606**		0.00000%	$ -	$ -	0.00000%	$ -
10. Tranquillity ID** -withdrew 8/31/11	0	0.00000%	$ -	$ -	0.00000%	$ -
11. Turner Island Water District	0	0.00000%	$ -	$ -	0.00000%	$ -
Total Division 5	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
OTHER						
1. Northwestern Delta Mendota Subbasin GSA (Stan. Cty 56,766 ac + Merced Cty 3,035 ac)	59,801	37.31615%	$ 429,596	$ 373,183	20.00000%	$ 56,413
1a. Merced County (5% of Northwestern DM GSA Cost)			$ 4,736			
1b. Stanislaus County (95% of Northwestern DM GSA Cost)			$ 89,993			
2. City of Patterson GSA	6,140	3.83139%	$ 94,730	$ 38,316	20.00000%	$ 56,413
3. Fresno County	0	0.00000%	$ -	$ -	0.00000%	$ -
4. Merced County	0	0.00000%	$ -	$ -	0.00000%	$ -
5. Santa Nella County Water District	0	0.00000%	$ -	$ -		
6. Widren GSA	0	0.00000%	$ -			
Total Other	**65,941**	41.14755%	**$ 524,326**	$ 411,499	40.00000%	$ 112,827
	160,255	**100.00%**	**$ 1,282,124**	$ 1,000,057	100.00%	$ 282,067

EKI Table 1 Costs Only

	GSA Acreage to Allocate Costs	% of Northern Region Acreage	TOTAL SGMA	Other Professional Services	Equal Split between # of GSAs	Authority & Legal
			$ 131,000	$ 102,180	%	$ 28,820
DIVISION 1						
1. Banta-Carbona ID		0.00000%	$ -	$ -	0.00000%	$ -
2. City of Tracy		0.00000%	$ -	$ -	0.00000%	$ -
3. Del Puerto Water District (DPWD 52,570 ac + Oak Flat 4,503 ac)	57,073	35.61387%	$ 42,154	$ 36,390	20.00000%	$ 5,764
3A. Del Puerto (92% of DPWD GSA Cost)			*$ 38,782*			
3B. Oak Flat (8% of DPWD GSA Cost)			*$ 3,372*			
4. Patterson Irrigation District (PID 13,067 ac + Twin Oaks 2,629 ac)	15,696	9.79439%	$ 15,772	$ 10,008	20.00000%	$ 5,764
5. Byron Bethany Irrigation District (2020 absorbed West Side ID)		0.00000%	$ -	$ -		
6. West Side Irrigation District		0.00000%	$ -	$ -	0.00000%	$ -
7. West Stanislaus ID (WSID 21,299 ac + Grayson/Westley 246 ac)	21,545	13.44420%	$ 19,501	$ 13,737	20.00000%	$ 5,764
Total Division 1	**94,314**	58.8525%	**$ 77,428**	$ 60,136	**60.00000%**	$ 17,292
DIVISION 2						
1. Panoche Water District		0.00000%	$ -	$ -		
2. San Luis Water District		0.00000%	$ -	$ -		
3. Westlands Water District (1)		0.00000%	$ -	$ -		
4. Charleston Drainage District		0.00000%	$ -	$ -	0.00000%	$ -
5. Panoche Drainage District		0.00000%	$ -	$ -	0.00000%	$ -
6. Pleasant Valley		0.00000%	$ -	$ -	0.00000%	$ -
Total Division 2	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
DIVISION 3						
1. Central California Irrigation District**		0.00000%	$ -	$ -	0.00000%	$ -
2. Firebaugh Canal Water District**		0.00000%	$ -	$ -	0.00000%	$ -
3. Grassland Water District		0.00000%	$ -	$ -	0.00000%	$ -
4. HMRD #2131**		0.00000%	$ -	$ -	0.00000%	$ -
5. Columbia Canal Company (Friend Member)**		0.00000%	$ -	$ -	0.00000%	$ -
6. Camp 13 Drainers		0.00000%	$ -	$ -	0.00000%	$ -
Total Division 3	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
DIVISION 4						
1. San Benito County Water District			$ -	$ -	0.00000%	$ -
2. Valley Water District (2)			$ -	$ -	0.00000%	$ -
Total Division 4	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
DIVISION 5						
1. Broadview Water District		0.00000%	$ -	$ -		
2. Eagle Field Water District	0	0.00000%	$ -	$ -		
3. Fresno Slough WD** -withdrew 8/31/11	0	0.00000%	$ -	$ -	0.00000%	$ -
4. James Irrigation District**		0.00000%	$ -	$ -	0.00000%	$ -
5. Laguna Water District		0.00000%	$ -	$ -		
6. Mercy Springs Water District	0	0.00000%	$ -	$ -		
7. Oro Loma Water District	0	0.00000%	$ -	$ -	0.00000%	$ -
8. Pacheco Water District	0	0.00000%	$ -	$ -		
9. Reclamation District 1606**		0.00000%	$ -	$ -	0.00000%	$ -
10. Tranquillity ID** -withdrew 8/31/11	0	0.00000%	$ -	$ -	0.00000%	$ -
11. Turner Island Water District	0	0.00000%	$ -	$ -	0.00000%	$ -
Total Division 5	**0**	0.00000%	**$ -**	$ -	**0.00000%**	$ -
OTHER						
1. Northwestern Delta Mendota Subbasin GSA (Stan. Cty 56,766 ac + Merced Cty 3,035 ac)	59,801	37.31615%	$ 43,894	$ 38,130	20.00000%	$ 5,764
1a. Merced County (5% of Northwestern DM GSA Cost)			$ 484			
1b. Stanislaus County (95% of Northwestern DM GSA Cost)			$ 9,195			
2. City of Patterson GSA	6,140	3.83139%	$ 9,679	$ 3,915	20.00000%	$ 5,764
3. Fresno County	0	0.00000%	$ -	$ -	0.00000%	$ -
4. Merced County	0	0.00000%	$ -	$ -	0.00000%	$ -
5. Santa Nella County Water District	0	0.00000%	$ -	$ -		
6. Widren GSA	0	0.00000%	$ -			
Total Other	**65,941**	41.14755%	**$ 53,573**	$ 42,045	**40.00000%**	$ 11,528
	160,255	**100.00%**	**$ 131,000**	$ 102,180	100.00%	$ 28,820

11/3

Fund 63 FY 2025 Costs

FY24 Projections & FY25 Budget Draft
FAC/WRC/BOD Workshop 12/19/23

DIVISION 1	Total Acres	Central DM Multi Agency GSA Acres	%	SGMA Coord	Legal, Other Prof., Other	SGMA Rd 1 (Grant Admin) 1	Single GSP SPA 2
				$ 1,844,221	**$ 1,020,891**	$ 73,330	$ 750,000
1. Banta-Carbona ID			0.000%	$ -	$ -		
2. City of Tracy			0.000%	$ -	$ -		
3. Del Puerto Water District (DPWD 52,570 ac + Oak Flat 4,503 ac)	57,073	0	1.667%	$ 19,745	$ 17,015	$ 2,730	
3A. Del Puerto (92% of DPWD GSA Cost)			*0.000%*	*$ 18,165*	*$ 15,654*	*$ 2,512*	
3B. Oak Flat (8% of DPWD GSA Cost)			*0.000%*	*$ 1,580*	*$ 1,361*	*$ 218*	
4. Patterson Irrigation District (PID 13,067 ac + Twin Oaks 2,629 ac)	15,696	0	1.667%	$ 17,118	$ 17,015	$ 103	
5. Byron Bethany Irrigation District			0.000%	$ -	$ -	$ -	
6. West Stanislaus ID (WSID 21,299 ac + Grayson/Westley 246 ac)	21,545	0	1.667%	$ 19,318	$ 17,015	$ 2,303	
Total Division 1	**94,314**	**0**	**5.000%**	**$ 56,180**	**$ 51,044**	$ 5,136	$ -
DIVISION 2							
1. Panoche Water District	38,317	38,317	0.694%	$ 7,132	$ 7,089	$ 43	
2. San Luis Water District	55,316	55,316	0.694%	$ 16,781	$ 7,090	$ 9,692	
3. Westlands Water District (1)			0.000%	$ -	$ -	$ -	
4. Charleston Drainage District			0.000%	$ -	$ -	$ -	
5. Panoche Drainage District			0.000%	$ -	$ -	$ -	
6. Pleasant Valley			0.000%	$ -	$ -	$ -	
Total Division 2	**93,633**	**93,633**	1.389%	**$ 23,913**	**$ 14,179**	$ 9,734	$ -
DIVISION 3							
1. Central California Irrigation District			0.000%	$ -	$ -	$ -	
2. Firebaugh Canal Water District			0.000%	$ -	$ -	$ -	
3. Grassland Water District			16.667%	$ 185,047	$ 170,148	$ 14,899	
4. HMRD #2131			0.000%	$ -	$ -	$ -	
5. Columbia Canal Company (Friend Member)			0.000%	$ -	$ -	$ -	
6. Camp 13 Drainers			0.000%	$ -	$ -	$ -	
Total Division 3	**0**	**0**	16.667%	**$ 185,047**	**$ 170,148**	$ 14,899	$ -
DIVISION 4							
1. San Benito County Water District			0.000%	$ -	$ -	$ -	
2. Santa Clara Valley Water District (2)			0.000%	$ -	$ -	$ -	
Total Division 4	**0**	**0**	0.000%	**$ -**	**$ -**	$ -	$ -
DIVISION 5							
1. Broadview Water District			0.000%	$ -	$ -	$ -	
2. Eagle Field Water District	1,325	1,325	0.694%	$ 7,132	$ 7,089	$ 43	
3. Fresno Slough WD	1,459	1,459	0.694%	$ 7,132	$ 7,089	$ 43	
4. James Irrigation District			0.000%	$ -	$ -	$ -	
5. Laguna Water District			0.000%	$ -	$ -	$ -	
6. Mercy Springs Water District	3,840	3,840	0.694%	$ 7,132	$ 7,089	$ 43	
7. Oro Loma Water District	1,258		0.694%	$ 7,132	$ 7,089	$ 43	
8. Pacheco Water District	4,999	4,999	0.694%	$ 7,132	$ 7,089	$ 43	
9. Reclamation District 1606			0.000%	$ -	$ -	$ -	
10. Tranquillity ID	10,750	10,750	0.694%	$ 7,132	$ 7,089	$ 43	
11. Turner Island Water District		0	0.000%	$ -	$ -	$ -	
Total Division 5	**23,631**	**22,373**	3.472%	**$ 42,792**	**$ 42,535**	$ 257	$ -
OTHER							
1. San Joaquin River Exchange Contractors**			16.667%	$ 185,000	$ 170,149	$ 14,851	
2. Northwestern Delta Mendota Subbasin GSA (Stan. Cty 56,766 ac + Merced Cnty 3,035 ac)	59,801	0	1.667%	$ 17,118	$ 17,015	$ 103	
2a. Merced County (5% of Northwestern DM GSA Cost)				*$ 856*	*$ 851*	*$ 5*	
2b. Stanislaus County (95% of Northwestern DM GSA Cost)				*$ 16,262*	*$ 16,164*	*$ 98*	
3. City of Patterson GSA	6,140	0	1.667%	$ 17,118	$ 17,015	$ 103	
4. Fresno County (Fresno County Management Area A	29,728	29,728	17.361%	$ 181,002	$ 177,238	$ 3,764	
5. Merced County (Central DM Portion)	14,176	14,176	0.694%	$ 7,133	$ 7,090	$ 43	
6. Santa Nella County Water District	1,488	1,488	0.694%	$ 7,132	$ 7,089	$ 43	
7. Aliso Water District			16.667%	$ 183,041	$ 170,149	$ 12,891	
8. Farmers Water District			16.667%	$ 181,611	$ 170,149	$ 11,462	
9. Widren GSA	877		0.694%	$ 7,132	$ 7,089	$ 43	
Total Other	**112,210**	**45,392**	22.083%	**$ 786,288**	**$ 742,984**	$ 43,304	$ -
	323,788	**161,398**	**48.61%**	**$ 1,094,221**	**$ 1,020,891**	$ 73,330	$ -

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

1,2 - Refer to Budget Assumptions 3-15

114

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IX E

Adam Scheuber

From: Bernard, Rebecca L <rbernard@usbr.gov>
Sent: Monday, July 8, 2024 10:13 AM
To: Henderson, Shalese P; Loperena, Marissa S; Carper, Mark A
Cc: Adam Scheuber; Hyatt, David E
Subject: Del Puerto Water District Groundwater Well Remote Telemetry Program 23-028: Updated project construction timeframe
Attachments: 23-028 Del Puerto Water District Groundwater Well Remote Telemetry Program_Final_updated CM for MBTA_July2024.docx

Folks—Sorry attached wrong version—please discard the attachment in the previous email and replace with the attached correct version.

Thank You,
Rebecca

Rebecca Bernard
Wildlife Biologist
Bureau of Reclamation
Interior Region 10 - California-Great Basin
South-Central California Area Office
1243 N Street, Fresno, CA 93721
559-262-0341
rbernard@usbr.gov

From: Bernard, Rebecca L <rbernard@usbr.gov>
Sent: Monday, July 8, 2024 9:54 AM
To: Henderson, Shalese P <sphenderson@usbr.gov>; Loperena, Marissa S <mloperena@usbr.gov>; Carper, Mark A <mcarper@usbr.gov>
Cc: ascheuber@delpuertowd.org <ascheuber@delpuertowd.org>; Hyatt, David E <dhyatt@usbr.gov>
Subject: Re: [EXTERNAL] RE: NEPA Meeting

Folks--
Per Adam Scheuber's comments requesting a solution and suggesting working outside of the migratory bird nesting period to avoid the need for bird surveys and reduce Project costs:

Biological Resources	To avoid and minimize impacts to migratory birds, Project meter installation would be completed outside the migratory bird nesting season (February 1 through September 15).
Biological Resources	Should installation of meters need to occur within the migratory bird nesting season (February 1 through September 15), the district would conduct a pre-activity survey for nesting birds and raptors within 14 days prior to the initiation of Project activities.

Also see edited text to reflect the new project activity timeframe outside of the migratory bird nesting period—highlighted in yellow.

Thank You,
Rebecca

Rebecca Bernard
Wildlife Biologist
Bureau of Reclamation
Interior Region 10 - California-Great Basin

115

South-Central California Area Office
1243 N Street, Fresno, CA 93721
559-262-0341
rbernard@usbr.gov

From: Henderson, Shalese P <sphenderson@usbr.gov>
Sent: Monday, July 8, 2024 8:03 AM
To: Bernard, Rebecca L <rbernard@usbr.gov>; Loperena, Marissa S <mloperena@usbr.gov>; Carper, Mark A <mcarper@usbr.gov>
Subject: Fw: [EXTERNAL] RE: NEPA Meeting

Good morning,

Enclosed are DPWD edits and comments. Let me know if you care to have further discussion.

Thank you,
Shalese

From: Adam Scheuber <ascheuber@delpuertowd.org>
Sent: Friday, July 5, 2024 3:54 PM
To: Henderson, Shalese P <sphenderson@usbr.gov>
Cc: Anthea Hansen <ahansen@delpuertowd.org>
Subject: RE: [EXTERNAL] RE: NEPA Meeting

Hi Shalese,

Here are some edits from DPWD and comments from DPWD. Let me know if you have any questions or would like to discuss.

Thanks,

Adam Scheuber, P.E.
Deputy General Manager – Water Resources
Del Puerto Water District
ascheuber@delpuertowd.org
T 209.892.4470 | C 209.985.2186

From: Henderson, Shalese P <sphenderson@usbr.gov>
Sent: Wednesday, June 26, 2024 8:28 AM
To: Anthea Hansen <ahansen@delpuertowd.org>; Adam Scheuber <ascheuber@delpuertowd.org>
Subject: Re: [EXTERNAL] RE: NEPA Meeting

Anthea,

Enclosed, please find a draft of the CEC Reclamation report. Due to the absence of our Natural Resources Specialist she's on vacation, some pertinent details currently need to be made available. Therefore, I have included a draft copy for your perusal and review.

114

Please know the draft is not complete.

Thank you,
Shalese

From: Anthea Hansen <ahansen@delpuertowd.org>
Sent: Wednesday, June 26, 2024 7:35 AM
To: Henderson, Shalese P <sphenderson@usbr.gov>; Adam Scheuber <ascheuber@delpuertowd.org>
Subject: RE: [EXTERNAL] RE: NEPA Meeting

Good morning, Shalese,

Thank you for the update. When a draft is available, we would like an opportunity to review. Our turnaround time will be immediate. Can you please let us know what the notice requirements are and steps are for final approval.

We look forward to working with you to get this project completed.

Sincerely,
Anthea

Anthea G. Hansen
General Manager
Del Puerto Water District
PH 209-892-4470/FAX 209-892-4469

From: Henderson, Shalese P <sphenderson@usbr.gov>
Sent: Wednesday, June 26, 2024 7:08 AM
To: Adam Scheuber <ascheuber@delpuertowd.org>; Anthea Hansen <ahansen@delpuertowd.org>
Subject: Re: [EXTERNAL] RE: NEPA Meeting

Good Morning DPWD,

I hope this email finds you in good health. The NEPA team responsible for overseeing your environmental compliance informed me that they have received all the necessary information and are working on your report. Please expect the report to be completed within the next three weeks.

Thank you,

Shalese Henderson
Water Conservation Specialist

USDOI - Bureau of Reclamation
Interior Region 10 - California Great Basin (CGB)
2800 Cottage Way - CGB-410
Sacramento, CA 95825
☎ (916) 978 - 5203 | **Email:** sphenderson@usbr.gov

117

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