

# **Sustainable Groundwater Management Act Joint GSP Public Comment Review**

## **Madera Subbasin**

### **Coordination Committee**

**4:00 p.m. to 5:30 p.m., December 2, 2019**

**Madera County**

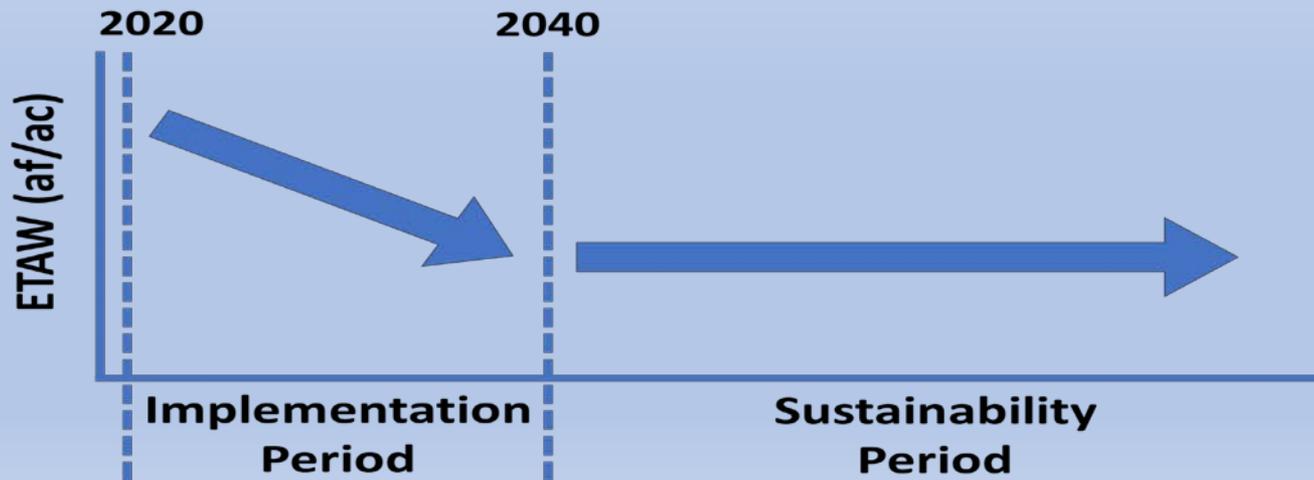
**Madera, CA**

# Outline

- GSP Background
- Comments Received
- Response to Public Comments
- Subject Areas with Multiple Comments
- Next Steps

# What is a Groundwater Sustainability Plan?

The Groundwater Sustainability Plan (GSP) (currently in draft form) is a new document required by the state that was developed to demonstrate how groundwater sustainability will be achieved in the subbasin by 2040.



# How was the GSP Developed?

- With the support of a \$500,000 grant for ‘stressed basins’ from DWR
- With the support of a \$1.5 million grant from DWR
- Local technical experts and a consultant team drafted the GSP
- Incorporated feedback from the public, a Coordination Committee, and Groundwater Sustainability Agency (GSA) Boards throughout development

# Outreach

## Have You Heard of SGMA?

Sustainable Groundwater Management Act

### Get Involved!

Groundwater is an essential resource for our homes, farms, and businesses. The State of California requires that we submit Groundwater Sustainability Plans (GSPs) by January 31, 2020. The GSPs must bring us to sustainability by 2040.

To join the interested party list, find out which Groundwater Sustainability Agency (GSA) represents you, or to learn more and participate in the plan: [maderacountywater.com](http://maderacountywater.com)

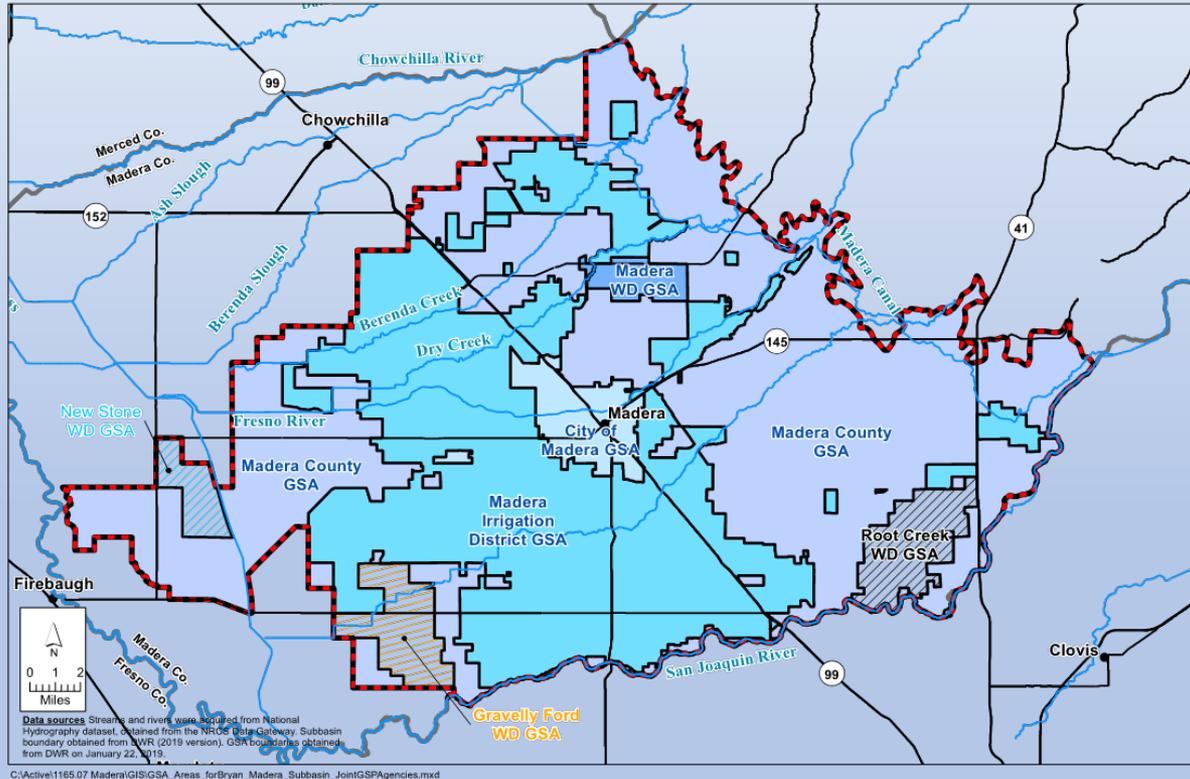
Madera County Water & Natural Resources—559-675-7703



# Previous Subbasin Workshops

- Technical Workshop 5/24/2018
- Technical Workshop 6/25/2018
- Groundwater Workshop 8/2/2018
- Technical Workshop 10/18/2018
- Coordination Committee 3/21/2019
- Technical Workshop 4/25/2019
- Technical Workshop 5/29/2019
- Coordination Committee 8/7/2019
- Coordination Committee 10/22/2019

# Madera Subbasin: 7 GSAs preparing 4 GSPs



## Total Subbasin

~ 348,000 ac

~ 216,000 ac

irrigated

## Madera County GSA

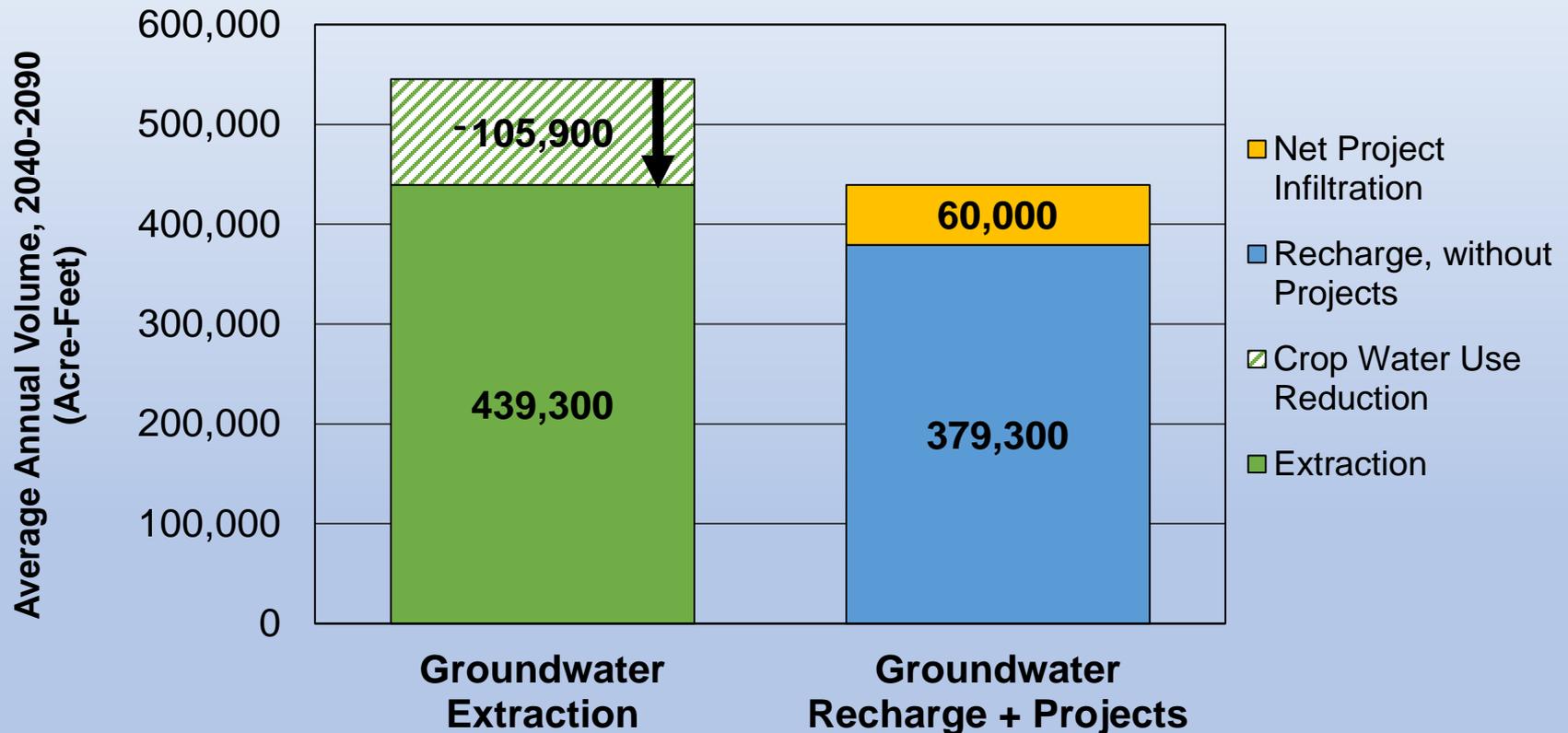
~180,000 ac

~85,000 ac irrigated

- Significant number of acres are 'non-irrigated' (unique to County GSA)

7

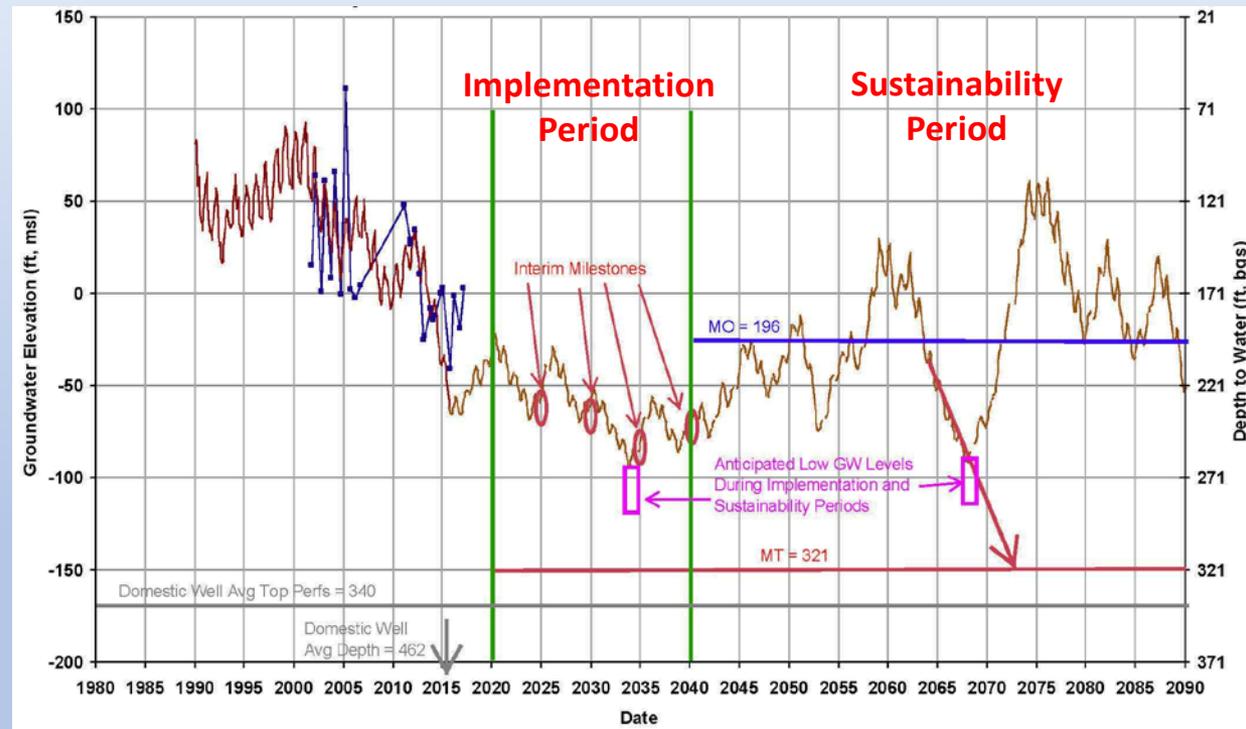
# Simplified Groundwater Condition With Projects (2040-2090)



Crop Water Use Reduction Program: Madera County GSA 90,000 acre-feet (AF). Remaining crop water use reduction due to permanent recharge basins replacing irrigated area.

# Potential near-term groundwater impacts

- GSAs need time to transition and complete projects and actions – as a result, groundwater levels will lower somewhat during implementation
- Planned mitigation for impacts can address concerns of lowered groundwater levels during implementation



# Groundwater impacts would be much greater without the GSP projects and management actions

- Modeling estimated that groundwater levels would continue to drop absent the projects and management actions contemplated by the GSP
  - Without the GSP: groundwater levels would drop another 100 to 150 feet by 2090
  - With the GSP: groundwater levels may temporarily drop between 2020 and 2040, but are expected to stabilize by 2040 and into the future

# GSAAs are considering a mitigation program for impacted drinking water wells

- Details developed during first year of implementation
  - Subbasin is applying for \$500,000 grant for well inventory
- Possible mitigation actions
  - Replace/lower existing well
  - Connect to community water system
  - Staging and availability of temporary solutions
- Possible types of support
  - Low interest loans
  - Grants
- Likely will require well owners to sign up for program

# Public Comment Period

- Informal comment period beginning when the draft of the first chapter of the GSP was released in April 2019
- Formal 90 day public comment period
  - Available for public review: Aug. 7, 2019
  - Public comment period ended: Nov. 9, 2019
- Special GSP Coordination Committee meeting (listening session) on October 22, 2019 to solicit written comments
- Additional 60-day public comment period after GSP is submitted to DWR

# Comments Received

- Al Solis (4/2)
- Anonymous (7/16)
  - two copies
- Bill Diedrich (5/19)
- Bill Diedrich (11/8)
- California Poultry Federation (11/8)
- Erik Smith (4/3)
- Food Commons Fresno/Road 20 Farm (11/8)
- Fresno Irrigation District (11/8)
- Hancock Farmland Services (11/8)
- James Paul Provenzano (9/4)
- James Paul Provenzano (10/22)
- Jeannie Habben (4/17)
- Joint Letter/Ag Innovations (11/8)
- Leadership Council for Justice and Accountability (LCJA) (6/27)
- Leadership Council for Justice and Accountability (11/8)
- Madera Valley Water Company (11/8)
- Mark Hutson (11/2)



# Comments Received (cont.)

- Madera Agricultural Water Association (11/9)
- McCormick, Barstow, Sheppard, Wayte & Carruth LLP (10/21)
- North Kings GSA (11/8) – submitted twice (once by Kassy Chauhan and once by Lynn Rowe)
- Provost & Pritchard (11/1)
- Root Creek Water District (11/9)
- Sarb Johal (10/22)
- Self-Help Enterprises (11/8)
- San Joaquin River Exchange Contractors GSA (11/8)
- The Nature Conservancy (7/1)
- The Nature Conservancy (11/8)
- Valley Children’s Hospital (11/8)
- Verbal comments from 10/22 meeting
- Wonderful Citrus (11/8)

# Response to Public Comments

- **Comments received were reviewed by:**
  - GSP Consultant Team
  - GSA Technical Experts
  - GSP Plan Manager
  - GSA Advisory Committee Members
  - GSA Elected Representatives
  - GSP Grant Manager
- **Comments put in a spreadsheet**
- **Comments organized into subject areas with multiple comments for efficient response**
- **Comments outside of subject areas responded to in spreadsheet**
- **Responses developed by consultant team with input and review by all comment reviewers**

# Documentation of Response to Public Comments

- Included in GSP as Appendix 2.C.e
  - List of Comments Received
  - Multiple Comment Subject Area Responses
  - Table Summarizing all Comments and Responses
  - Complete Text of all Comments Received

# Subject Areas with Multiple Comments

- Demand Management Reduction Program
- Groundwater Dependent Ecosystems (GDEs)
- Surface Water - Groundwater Interactions
- Outreach, Including Disadvantaged Communities and Severely Disadvantaged Communities (DACs/SDACs)
- Subsurface Inflows
- Groundwater Quality
- Groundwater Levels Related to Domestic Wells
- Subsidence

# Demand Management Reduction Program

- **Comment Summary**
  - Program lacks details
  - Should initiate stakeholder process
- **Response**
  - Stakeholder process is underway with details worked on by Madera County GSA with input from various groups including:
    - Madera County GSA meetings,
    - Madera County Advisory Committee for County GSAs,
    - Madera Coordination Committee meetings,
    - Discussions with Madera County Farm Bureau, and
    - The Madera Ag Water Association

# Groundwater Dependent Ecosystems

- **Comment Summary**
  - Clarify methods used to identify potential Groundwater Dependent Ecosystems (GDEs),
  - Analyze potential impacts to potential GDEs, and
  - Consider potential GDEs in setting:
    - Sustainability goals,
    - Measurable objectives (MOs) and
    - Minimum thresholds (MTs)
  - Appreciation for the comprehensive evaluation of potential GDEs in the subbasin and the appropriate use of tools and guidance recommended by The Nature Conservancy
- **Response**
  - Clarified methods and analysis and how potential GDEs were considered in setting sustainability goals, MOs and MTs

# Surface Water - Groundwater Interactions

- **Comment Summary**
  - Insufficient characterization of surface water – groundwater interactions,
  - Insufficient description of data gaps and how they will be filled, and
  - Disagreement with the conclusion that surface water and groundwater are disconnected in the subbasin
- **Response**
  - Clarified methods and analysis and data availability for the analysis



# Outreach (Including DACs/SDACs)

- **Comment Summary**
  - Provide more information about beneficial users, including Disadvantaged Communities (DACs) and Severely Disadvantaged Communities (SDACs), and
  - Describe how they were engaged
- **Response**
  - More detail was added to section 2.1.5.3 about how engagement efforts encouraged the active involvement of beneficial users

# Subsurface Inflows

- **Comment Summary**

- Concerned that subsurface inflows are calculated using an uncalibrated numerical model, and
- Concerned for historical and ongoing subsurface inflow from Delta Mendota and Kings Subbasins

- **Response**

- Calibration of the numerical groundwater model is described in detail in Appendix 6.D
- Subsurface lateral inflows from Delta Mendota and Kings Subbasins will be significantly reduced as a result of implementation of the projects and management actions

# Groundwater Quality

- **Comment Summary**

- Include additional constituents in GSP monitoring;
- Clarify source of water quality MTs;
- Clarify differences in representative monitoring sites (RMS) for water levels vs. water quality;
- Clarify potential for groundwater contamination to impact domestic wells;
- Clarify risks of proposed GSP activities to groundwater quality;

- **Response**

- The responsibility of the GSP relative to groundwater quality mainly falls into the following categories (discussed in the GSP):
  - Altering the movement and spread of known contaminant plumes due to GSP projects/management actions;
  - Impacts that are specifically related to declining groundwater levels (e.g., arsenic, possibly TDS);
  - Flushing of contaminants from the vadose zone in recharge project areas.
- Oversight of subbasin groundwater quality is primarily the responsibility of the Regional Water Quality Control Board (RWQCB) and State Water Resources Control Board (SWRCB)

# Groundwater Levels Related to Domestic Wells

- **Comment Summary**

- The estimated number of domestic wells potentially impacted by declining groundwater levels is too low;
- Input from disadvantaged communities and potential impacts to domestic wells was not fully considered;
- Groundwater level MTs/MOs are too low and do not protect domestic wells

- **Response**

- GSAs have seriously and meaningfully considered various inputs received from disadvantaged communities and other beneficial users in the subbasin, which often present conflicting opinions on GSP sustainable management criteria
- Minimum Thresholds are
  - Designed to work in conjunction with the domestic well mitigation program and
  - Not an indication of where the basin water levels are projected to be
- Alternatives that may immediately reduce the potential decline in groundwater levels have significant and sudden economic impacts to all beneficial users.

# Subsidence

- **Comment Summary**
  - GSP should set Sustainable Management Criteria (SMC) for subsidence;
  - GSP is not in compliance with SGMA related to lack of subsidence SMC being established in the GSP;
  - GSP should discuss subsidence along the Eastside Bypass;
  - Western Madera County adjacent to Delta-Mendota Subbasin should be reducing pumping from the Lower Aquifer
- **Response**
  - GSP provides for close monitoring of subsidence with triggers for adaptive management in the future

# Procedural Next Steps

- **GSA Coordination Committee votes on recommendation to GSAs to adopt GSP**
- **GSA public hearings to consider adopting the GSP**
  - Madera ID December 17, 2019
  - Madera County December 17, 2019
  - Madera Water District December 11, 2019
  - City of Madera December 18, 2019
- **Submit adopted GSP to Department of Water Resources**
- **Additional 60-day public comment period after GSP is submitted to DWR**