

RESOLUTION No. 2022-01

DELTA-MENDOTA SUBBASIN COORDINATION COMMITTEE

A RESOLUTION ACKNOWLEDGING A LOCAL EMERGENCY, RATIFYING THE PROCLAMATION OF A STATE OF EMERGENCY AND AUTHORIZING REMOTE TELECONFERENCE MEETINGS OF THE DELTA-MENDOTA SUBBASIN COORDINATION COMMITTEE FOR THE PERIOD FROM JANUARY 18, 2022 TO FEBRUARY 17, 2022 PURSUANT TO BROWN ACT PROVISIONS.

WHEREAS, the DELTA-MENDOTA SUBBASIN COORDINATION COMMITTEE (“Committee”) is committed to preserving and nurturing public access and participation in meetings of the members on the Committee; and

WHEREAS, all meetings of the Committee’s legislative bodies are open and public, as required by the Ralph M. Brown Act (Cal. Gov. Code 54950 – 54963), so that any member of the public may attend, participate, and watch the Committee’s legislative bodies conduct their business; and

WHEREAS, the Brown Act, Government Code section 54953(e), makes provisions for remote teleconferencing participation in meetings by members of a legislative body, without compliance with the requirements of Government Code section 54953(b)(3), subject to the existence of certain conditions; and

WHEREAS, a required condition is that a state of emergency is declared by the Governor pursuant to Government Code section 8625, proclaiming the existence of conditions of disaster or of extreme peril to the safety of persons and property within the state caused by conditions as described in Government Code section 8558; and

WHEREAS, a proclamation is made when there is an actual incident, threat of disaster, or extreme peril to the safety of persons and property within the jurisdictions that are within the Committee’s boundaries, caused by natural, technological, or human-caused disasters; and

WHEREAS, it is further required that state or local officials have imposed or recommended measures to promote social distancing, or, the legislative body meeting in person would present imminent risks to the health and safety of attendees; and

WHEREAS, such conditions now exist within the Committee’s boundaries, specifically, by Governor's Order N-21-21, the Governor has extended the March 4, 2020 proclamation declaring a State of Emergency due to the impacts of COVID-19 to March 31, 2022; and

WHEREAS, allowing all individual members of the Committee and the members of the public to meet in person would present an imminent risk to the health and safety of attendees; and

WHEREAS, the Committee members do hereby find that such conditions has caused, and will continue to cause, conditions of peril to the safety of persons within the boundaries of the Delta-Mendota Subbasin that are likely to be beyond the control of Committee services, personnel, equipment, and facilities, and desires to proclaim a local emergency and ratify the proclamation of state of emergency by the Governor of the State of California; and

WHEREAS, as a consequence of the local emergency, the Committee members do hereby find that the legislative bodies of the Committee shall conduct their meetings without compliance with paragraph (3) of subdivision (b) of Government Code section 54953, as authorized by subdivision (e) of section 54953, and that such legislative bodies shall comply with the requirements to provide the public with access to the meetings as prescribed in paragraph (2) of subdivision (e) of section 54953; and

WHEREAS, the Committee shall ensure that the public has the opportunity to participate live in all electronic meetings of the Committee and all its legislative bodies during all public comment periods.

NOW, THEREFORE, the Committee Members of The Delta-Mendota Subbasin Coordination Committee do hereby resolve as follows:

Section 1. Recitals. The Recitals set forth above are true and correct and are incorporated into this Resolution by this reference.

Section 2. Proclamation of Local Emergency. The Committee members hereby proclaim that a local emergency now exists throughout the Delta-Mendota Subbasin, and full in-person meetings could cause an imminent risk to the Committee members, staff and public.

Section 3. Ratification of Governor's Proclamation of a State of Emergency. The Committee members hereby ratify the Governor of the State of California's Proclamation of State of Emergency, effective as of its issuance date of March 4, 2020, as subsequently extended.

Section 4. Remote Teleconference Meetings. The staff and legislative bodies of the Committee are hereby authorized and directed to take all actions necessary to carry out the intent and purpose of this Resolution including conducting open and public meetings in accordance with Government Code section 54953(e) and other applicable provisions of the Brown Act.

Section 5. Effective Date of Resolution. This Resolution shall take effect immediately upon adoption and shall be effective until the earlier of (i) February 16, 2022, or (ii) such time the Committee members adopt a subsequent resolution in accordance with Government Code section 54953(e)(3) to extend the time during which the legislative bodies of the Committee may continue to teleconference without compliance with paragraph (3) of subdivision (b) of section 54953.

PASSED, APPROVED, AND ADOPTED this 18th day of January, 2022, by a motion from Member _____ and a second by Member _____, with the following vote to wit:

AYES:

NOES:

ABSTAIN:

ABSENT:

, Chair

**CERTIFICATE OF SECRETARY
OF
DELTA-MENDOTA SUBBASIN COORDINATION COMMITTEE**

I, _____, do hereby certify that I am the duly authorized and appointed Secretary of the Delta-Mendota Subbasin Coordination Committee (the "Committee"); that the following is a true and correct copy of that certain resolution duly and unanimously adopted and approved by the members of the Committee on the 18th day of January, 2022; and that said resolution has not been modified or rescinded and remains in full force and effect as the date hereof:

IN WITNESS WHEREOF, I have executed this Certificate on this ____ day of _____, 2022.

Secretary of Delta-Mendota Coordination
Committee

Delta-Mendota Subbasin Coordination Committee Meeting

Monday, December 13, 2021, 9:30 AM

[Click here to join meeting](#)
Call-in Number: +1 699-900-6833
Meeting ID: 896 9756 9044
Passcode: 264780

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

Coordination Committee Members and Alternates Present

Vince Lucchesi – Patterson Irrigation District/Northern Delta-Mendota Region
Chase Hurley – Pacheco Water District/Central Delta-Mendota Region
Lacey McBride – Merced County/Central Delta-Mendota Region (Alternate)
Jarrett Martin – Central California Irrigation District/SJREC
Alejandro Paolini – San Luis Canal Company/SJREC
Augie Ramirez – Fresno County
Ric Ortega – Grassland Water District
Ken Swanson – Grassland Water District (Alternate)
Joe Hopkins – Aliso Water District

San Luis & Delta-Mendota Water Authority Members Present

John Brodie
Joyce Machado
Lauren Neves
Claire Howard – Provost & Pritchard

Others Present

Anthea Hansen – Del Puerto Water District
Adam Scheuber – Del Puerto Water District
Ellen Wehr – Grassland Water District
Ben Fenters – Central California Irrigation District/SJREC
Juan Cadena – Mercy Springs Water District
Kait Palys Bautista – Provost & Pritchard
Rick Iger – Provost & Pritchard
Anona Dutton – EKI Environment & Water, Inc.
Leslie Dumas – Woodard & Curran
Will Halligan – Luhdorff & Scalmanini
Lauren Layne – Baker Manock & Jensen

1. Call to Order/Roll Call

Jarrett Martin/CCID called the meeting to order at 9:33 AM.

John Brodie/SLDMWA noted that the well census and subsidence characterization studies are on track for completion by the end of the fiscal year. Claire Howard/SLDMWA reminded the Committee that the results of each GSP Group's well census project are due to SLDMWA by January 10th. These data will also support the GSI Environmental Inc. team's Subsidence Characterization Study.

b. Subbasin Subsidence Characterization Study

A Subbasin Technical Working Group meeting will be held in January during which the GSI Environmental Inc. team will present progress on the Subbasin's Subsidence Characterization Study.

c. USBR/USGS CVHM2-SJB Modeling Efforts

USBR and USGS representatives recently provided an update to Subbasin representatives on the progress of the CVHM2-SJB model development. The model will be shared for peer review in early 2022 to support the verification process.

12. Discussion of Delta-Mendota Subbasin Inter-basin Coordination Efforts, Brodie

a. Facilitation Support Services (FSS) Inter-basin Coordination Progress

John Brodie/SLDMWA shared that the Subbasin's FSS program with DWR has been extended to June 30, 2022 to support additional inter-basin meetings with representatives from Chowchilla, Madera, and Merced Subbasins.

b. Tracy Subbasin Inter-basin Coordination

John shared that representatives from the Northern and Central Regions have been contacted by the Tracy Subbasin to hold an inter-basin meeting to discuss a recent comment letter submitted by the Northern and Central Management Committees during the Tracy Subbasin GSP's public comment period. This meeting will likely be scheduled for early January and will include the chairs of the Northern and Central Management Committees as well as SLDMWA staff.

13. Overview of Potential Funding Opportunities, Brodie

John Brodie/SLDMWA provided a brief overview of additional funding opportunities presented in the meeting materials.

14. Next Steps

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

No topics were discussed under this item.

16. ADJOURNMENT

Jarrett Martin/CCID adjourned the meeting at 11:44 AM.

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2021 - FEBRUARY 28, 2022
SGMA ACTIVITIES - COORDINATED COST-SHARE AGREEMENT
ACTIVITY AGREEMENTS BUDGET TO ACTUAL
COORDINATED (FUND 63)

Report Period 3/1/21 - 12/31/21
Coordination Meeting 1/18/22

EXPENDITURES	Annual Budget	Paid/ Pending	Additional Pending	Total Expenses	Amount Remaining	% of Amt Remaining	Expenses Through
<u>Legal:</u>							
Outside Counsel	\$ 4,000	\$ 4,739	\$ -	\$ 4,739	\$ (739)	-18%	12/31/21
<u>Other Professional Services:</u>							
GSP Implementation Contracts							
Coordinated Annual Reports Activities (Common Chapter, Water Level Contouring)	\$ 10,500	\$ 21,064	\$ -	\$ 21,064	\$ (10,564)	-101%	9/31/21
DMS Hosting, Augmentation and Support	\$ 14,943	\$ -	\$ -	\$ -	\$ 14,943	100%	
Staff Augmentation Support (Provost & Pritchard)	\$ 19,941	\$ 23,915	\$ -	\$ 23,915	\$ (3,974)	-20%	12/31/21
Proposition 68 (Grant Administration)							
Component 1 (Grant Administration)	\$ 30,000	\$ -	\$ -	\$ -	\$ 30,000	100%	
Component 2 (Technical Assistance)	\$ 45,000	\$ -	\$ -	\$ -	\$ 45,000	100%	
Component 11 (Subsidence Characterization)	\$ 85,000	\$ 46,155	\$ -	\$ 46,155	\$ 38,845	46%	12/31/21
<u>Other:</u>							
Executive Director	\$ 1,980	\$ -	\$ -	\$ -	\$ 1,980	100%	
General Counsel	\$ 3,116	\$ 69	\$ -	\$ 69	\$ 3,047	98%	10/31/21
Water Policy Director	\$ 2,955	\$ -	\$ -	\$ -	\$ 2,955	100%	
Water Resources Program Manager	\$ 34,571	\$ 25,394	\$ -	\$ 25,394	\$ 9,177	27%	12/31/21
Accounting	\$ 3,690	\$ 59	\$ -	\$ 59	\$ 3,631	98%	12/31/21
Los Banos Administrative Office (LBAO)	\$ 500	\$ -	\$ -	\$ -	\$ 500	100%	
Travel/Mileage	\$ 2,000	\$ -	\$ -	\$ -	\$ 2,000	100%	
Group Meetings	\$ 1,000	\$ -	\$ -	\$ -	\$ 1,000	100%	
Telephone	\$ 500	\$ -	\$ -	\$ -	\$ 500	100%	
Equipment and Tools	\$ 1,000	\$ -	\$ -	\$ -	\$ 1,000	100%	
Total Expenditures	\$ 260,696	\$ 121,394	\$ -	\$ 121,394	\$ 139,302	53%	



MEMORANDUM

TO: Delta-Mendota Subbasin Coordination Committee Members and Alternates

FROM: John Brodie, Water Resources Program Manager

DATE: January 18, 2022

RE: Coordination Committee Chair and Vice Chair Rotations

BACKGROUND

Section 5.2.1(b) of the Delta-Mendota Subbasin Coordination Agreement provides the following context on the Coordination Committee’s Chairperson and Vice Chairperson roles:

“The positions of Chairperson and Vice Chairperson shall rotate among the GSP Groups on an annual basis according to alphabetical order, with the first rotation beginning on the date the first Chairperson is selected. The schedule for rotation among the GSP Groups will be set at the first meeting after the Chairperson is appointed and reviewed and adjusted annually. A GSP Group Representative may waive designation as Chairperson. In such a case the Chairperson office would rotate to the next designated entity.”

The Coordination Committee approved the following rotation schedule in 2019, and these roles have rotated on an annual basis each January.

Year	Chairperson	Vice Chairperson
2019	N-C 1	N-C 2
2020	N-C 2	SJREC 1
2021	SJREC 1	SJREC 2
2022	SJREC 2	Aliso
2023	Aliso	Farmers
2024	Farmers	Fresno
2025	Fresno	Grassland
2026	Grassland	N-C 1
2027	N-C 1	N-C 2

The 2021 Chairperson is Jarrett Martin (SJREC 1) and Vice Chairperson is Alejandro Paolini (SJREC 2).

A significant amount of Subbasin-wide SGMA activity is anticipated for 2022, including responding to DWR comments on the Subbasin's GSPs, pursuing additional Subbasin-wide funding opportunities including SGMA Round 1 grant, revising the current Coordination Agreement, as well as ongoing monitoring and implementation activities. Given this amount of activity, the current Chairperson has offered to remain in the role for the current calendar year (2022) to support ongoing continuity.

ISSUES FOR DECISION

The Committee is tasked with considering the Chairperson and Vice Chairperson roles for 2022. These representatives will work closely with SLDMWA and consultant staff to coordinate with DWR representatives on GSP comments, set meeting agendas and timelines, and support Subbasin-wide SGMA progress.

The Committee is requested to provide input on maintaining the current Chair and Vice Chair positions for calendar year 2022. This recommendation requires all other GSP Group representatives to waive their designation as Chair or Vice Chair.

RECOMMENDATION

Based on Committee input, staff recommends Committee representatives waive their designation as Chairperson or Vice Chairperson for 2022 so that the current representatives maintain their positions for this year.

ANALYSIS

Maintaining the current Chairperson and Vice Chairperson representatives will support ongoing Subbasin-wide SGMA coordination in 2022 and benefit current collaboration with SLDMWA staff, DWR representatives, and consultant teams. Representation for these roles can be revisited in early 2023.

BUDGET

There are no budget impacts for this action item.



MEMORANDUM

TO: Delta-Mendota Subbasin Coordination Committee Members and Alternates

FROM: John Brodie, Water Resources Program Manager

DATE: January 18, 2022

RE: Amended Contract and Task Order for Prop 68 SGMA Implementation Grant Administration Services.

BACKGROUND

The San Luis & Delta-Mendota Water Authority (SLDMWA) entered into a Master Services Agreement with Woodard & Curran on March 1, 2020 to provide Groundwater Sustainability Plan Implementation Support for the Northern and Central Regions of the Delta-Mendota Subbasin. On May 1, 2020, a Task Order (TO) was added to that contract for Grant Administration for the Subbasin's Proposition 68 Sustainable Groundwater Management Act Funding. The TO budget was set at \$57,406 including a contingency budget of \$9,815 that requires authorization from the Delta-Mendota Coordination Committee prior to expenditure.

ISSUES FOR DECISION

Woodard & Curran has requested staff seek authorization to 1) expend part of the Contingency Budget in Fiscal Year 2022, 2) expend the remainder of the Contingency Budget in Fiscal Year 2023, and 3) raise the total budget an additional \$27,278 to a total of \$84,684. Of the total, \$35,908 is needed to complete the project. The grant is scheduled to terminate April 30, 2022. Staff does not intend to seek an extension, and all active tasks are scheduled for completion by February 28, 2022.

Both the Coordination Committee and the Northern and Central Management Committees tabled this item during their December meetings pending further detail from Woodard & Curran.

RECOMMENDATION

Staff recommends the following steps for the Coordination Committee:

1. Authorize expenditure of a portion of the existing Contingency Budget to cover FY 2022 expenses of the Proposition 68 Sustainable Groundwater Management Act Funding grant administration.
2. Authorize expenditure of remaining Contingency Budget in FY 2023
3. Authorize increase of \$27,273 to the total budget to complete grant administration tasks through final grant reporting and close-out activities in FY 2023.

The Northern and Central Management Committees provided approval and recommendation on these items during the special Management Committees meeting on January 12th.

ANALYSIS

Approval of this grant administration expenses and budget increase will ensure successful completion and reporting of the Subbasin's Proposition 1/68 grant. A deeper examination of available funds in the grant indicates there is available grant money that can be transferred into the administration category. This will result in no net outlay of additional funds for the Subbasin.

The transfer of funds between grant categories requires an amendment to the agreement. However, Woodard & Curran previously anticipated the need for an agreement amendment, and the necessary budget is already included in the TO.

BUDGET

Correspondence and budget tables on the following pages show expenditures for the remainder of this fiscal year, the total project budget with the amended increase, and the remaining estimated grant funding by category.

Grant Submittal Expenses

DM Grant Deliverable Tracker_010522.pdf

Hi John,

Following up on our recent discussions, I took a look at the expenditures on each submittal and took a stab at allocating those costs to the GSP groups (*note that these expenses are specifically related to the submittals and not to the general, coordinated grant admin work*). The first crack (shown below) allocates cost based on the relative amount being requested by each group on the submittal. The problem with this method is that it ends up assigning too much of the cost to the groups with a larger grant amount (Coordinated work and SLDMWA in particular, but the N-C and SJREC groups as well). I think that the column on the far right is a little better at telling the story since it focuses on Prop 68 money where each GSP group received the same amount. As an individual agency, SLDMWA still has a bigger piece of that pie (split out from the N-C GSP specific expenses) but that isn't surprising since they are central to much of the grant work.

With that, I want to reiterate that I don't think there is a perfect way to break out these costs since we didn't track the time associated with reviewing/preparing the submittal sections for each group. Ultimately I think the following notes still best sum up the situation:

- Submittal 8 and 9 could have been combined as could have Submittals 10 and 11. Combining these would have saved a couple thousand dollars each.
 - We had emailed during the submittal prep that we could skip a submittal but did not receive direction to do so.
- I don't think it is entirely reflected here (though somewhat in the Prop 68 column), but Farmers, Aliso and Fresno (and Grasslands to a lesser extent) required extra time to coordinate.
 - I can't quantify this but for each of these groups there have been multiple rounds of emails back and forth to clean up invoices, though that has not been an issue with the last few submittals. More recently, there were multiple rounds of edits requested for their component completion reports because they did not follow my initial directions and/or address the comments that I provided.
- The contract amendment that we are requesting can be completely covered by grant funds. If we don't submit any grant admin expenses from WSID or SLDMWA then our full amendment amount fits into the remaining grant admin budget. If those agencies have some grant admin work (I have been projecting that they would have a few thousand dollars related to their coordination support) then we could request a grant amendment to move some funds around (along with opening up the Technical Assistance funding for use).

Estimated Grant Admin Expenses Associated with GSP Group/Stakeholders (based on the relative amount submitted each period and cost of submittal)														
Component Name/Number		Submittal 1	Submittal 2	Submittal 3	Submittal 4	Submittal 5	Submittal 6	Submittal 7	Submittal 8	Submittal 9	Submittal 10	Submittal 11	Total	Prop 68 Contract Only (Submittal 7+)
Summary	Coordinated Expenses	\$1,338	\$2,526	\$3,816	\$3,483	\$5,646	\$5,000	\$2,510	\$699	\$668	\$1,168	\$967	\$28,568	\$6,758
	WSID Expenses	\$28	\$36	\$23	\$26	\$45	\$14	\$0	\$414	\$7	\$0	\$0	\$592	\$421
	SLDMWA Expenses	\$0	\$206	\$1,958	\$1,307	\$2,218	\$581	\$164	\$1,166	\$146	\$1,764	\$3,382	\$12,892	\$6,620
	N-C GSP Expenses	\$7,687	\$0	\$0	\$0	\$0	\$0	\$1,435	\$0	\$0	\$0	\$0	\$9,122	\$1,435
	Grasslands WD Expenses	\$0	\$3,831	\$333	\$0	\$0	\$0	\$0	\$2,433	\$0	\$0	\$0	\$6,598	\$2,433
	Farmers WD Expenses	\$0	\$3,482	\$0	\$0	\$0	\$0	\$1,827	\$0	\$0	\$0	\$0	\$5,309	\$1,827
	Aliso Expenses	\$1,856	\$0	\$0	\$1,492	\$0	\$1,068	\$0	\$0	\$3,150	\$0	\$0	\$7,567	\$3,150
	Fresno Co. Expenses	\$0	\$0	\$3,503	\$0	\$0	\$0	\$1,839	\$0	\$0	\$0	\$0	\$5,342	\$1,839
	SJREC Expenses	\$4,656	\$1,163	\$107	\$42	\$0	\$451	\$1,683	\$0	\$0	\$0	\$0	\$8,102	\$1,683
Total		\$15,566	\$11,244	\$9,741	\$6,350	\$7,909	\$7,115	\$9,458	\$4,711	\$3,971	\$2,932	\$4,349	\$84,091	\$26,167

Submittal Expenses Included by Component by GSP Group/Stakeholder														
Component Name/Number		Submittal 1	Submittal 2	Submittal 3	Submittal 4	Submittal 5	Submittal 6	Submittal 7	Submittal 8	Submittal 9	Submittal 10	Submittal 11	Total	Prop 68 Contract Only (Submittal 7+)
Summary	Coordinated Expenses	\$77,194	\$81,700	\$203,469	\$77,796	\$73,655	\$109,793	\$65,575	\$10,767	\$7,948	\$10,002	\$4,294	\$722,193	\$98,586
	WSID Expenses	\$1,615	\$1,153	\$1,227	\$571	\$581	\$313	\$0	\$6,379	\$85	\$0	\$0	\$11,925	\$6,464
	SLDMWA Expenses	\$0	\$6,674	\$104,407	\$29,188	\$28,940	\$12,768	\$4,283	\$17,964	\$1,732	\$15,105	\$15,016	\$236,076	\$54,099
	N-C GSP Expenses	\$443,362	\$0	\$0	\$0	\$0	\$0	\$37,500	\$0	\$0	\$0	\$0	\$480,862	\$37,500
	Grasslands WD Expenses	\$0	\$123,933	\$17,773	\$0	\$0	\$0	\$0	\$37,500	\$0	\$0	\$0	\$179,206	\$37,500
	Farmers WD Expenses	\$0	\$112,622	\$0	\$0	\$0	\$0	\$47,746	\$0	\$0	\$0	\$0	\$160,367	\$47,746
	Aliso Expenses	\$107,075	\$0	\$0	\$33,314	\$0	\$23,460	\$0	\$0	\$37,500	\$0	\$0	\$201,350	\$37,500
	Fresno Co. Expenses	\$0	\$0	\$186,755	\$0	\$0	\$0	\$48,040	\$0	\$0	\$0	\$0	\$234,795	\$48,040
	SJREC Expenses	\$268,518	\$37,617	\$5,711	\$937	\$0	\$9,898	\$43,977	\$0	\$0	\$0	\$0	\$366,658	\$43,977
Total		\$897,764	\$363,699	\$519,341	\$141,807	\$103,176	\$156,233	\$247,121	\$72,610	\$47,265	\$25,107	\$19,310	\$2,593,432	\$411,413

Budget Projections through Grant Completion

Description	Contract Fee	Projected Total Spent (Through Feb 2022)	Projected Contract Budget Remaining (at end of Feb 2022)	Projected Budget Remaining After Use of Contingency	Projected Budget Remaining After Task 1 Amendment	Budget Remaining after FY 23 Amendment
Task 1 – Prop 68 Quarterly Progress Reports and Reimbursement Requests	\$14,983	\$23,667	(\$8,684)	(\$1,942)	\$0	\$10,572
Task 2 – Prop 68/1 Final Component and Grant Close-out Reports	\$17,108	\$7,520	\$9,588	\$9,588	\$9,588	\$9,576 <i>*Slightly different than current projected remaining budget due to estimates/rounding</i>
Task 3 – Final Grant Agreement Amendment	\$1,816	\$828	\$989	\$989	\$989	\$996 <i>*Slightly different than current projected remaining budget due to estimates/rounding</i>
Task 4 – Grant-Related Communications	\$13,684	\$16,757	(\$3,073)	\$0	\$0	\$7,802
Task 5 – Contingency	\$9,815	\$0	\$9,815	\$0	\$0	\$6,962
PROJECT TOTAL	\$57,406	\$48,772	\$8,634	\$8,634	\$10,576	\$35,908
<i>Notes</i>	<i>Original Contract</i>	<i>Estimate</i>	<i>Estimate</i>	<i>Shift funds from Task 5 to Tasks 1 and 4</i>	<i>Amendment to cover Task 1 deficiency (\$1,942)</i>	<i>Estimate of \$35,908 included remaining budgets for Task 2 and 3. Adds \$25,331 to budget. Total added budget for both amendments = \$27,273.</i>

Component Name/Number	Prop Grant	Grant/Comp Admin Budget	Spent To Date (Dec 2021)	Estimated Budget Remaining
Component 1 – Administration	Prop 1 + Prop 68	\$76,599	\$52,337	\$24,262
Component 2 – Technical Assistance Services	Prop 1	\$85,000	\$74,119	\$10,881
Component 3 – Generic DMS	Prop 1	\$8,500	\$8,500	\$0
Component 9 – San Joaquin River Exchange Contractors GSP Development	Prop 1	\$10,000	\$10,000	\$0
Component 10 - Well Census and Inventory	Prop 68	\$4,300	\$0	\$4,300
Component 11 – Subsidence Characterization and Project Feasibility Determination	Prop 68	\$4,300	\$0	\$4,300
Total		\$188,699	\$144,956	\$43,743



MEMORANDUM

TO: Delta-Mendota Subbasin Coordination Committee Members and Alternates

FROM: John Brodie, Water Resources Program Manager

DATE: January 18, 2022

RE: Input on Reallocation of Proposition 1/68 Stakeholder Engagement Grant Funding

BACKGROUND

The Proposition 1/68 SGMA Implementation Grant between DWR and the Delta-Mendota Subbasin is set to expire 4/30/2022. All work that will be grant funded must be completed prior to that date. Work is finishing up right now on two outstanding components: the Well Census and Inventory project and the Subsidence Characterization and Project Feasibility study. Nearly all funds awarded will be expended. As of this moment, there is approximately \$50,000 remaining in the Technical Assistance – Stakeholder Engagement component. This task can be used to cover any outreach and education related to GSP tasks.

SLDMWA could retroactively invoice for eligible stakeholder engagement expenses, or seek a grant agreement amendment and request to move funds to the general Technical Assistance category to cover expenses incurred during GSP development. It is required that this funding be used for GSP development rather than implementation. This remaining funding could perhaps be used to pay for work associated with filling data gaps, if DWR agrees.

ISSUES FOR DECISION

Direction is requested from the Coordination Committee on how the Subbasin should approach reallocating available funding in the Technical Assistance – Stakeholder Engagement category so that as much of the available grant funding is spent on appropriate tasks and activities to accomplish DWR’s goals in funding this grant program.

RECOMMENDATION

Staff suggests seeking a grant agreement amendment with DWR to reallocate Technical Assistance – Stakeholder Engagement funds to the general Technical Assistance category so it can be retroactively

used for GSP development work. The Northern and Central Management Committees approved this recommendation during their January 12th meeting.

ANALYSIS

Reallocating the funding between categories will allow the Subbasin to maximize the use of grant funding for eligible activities and return the least amount of awarded funds back to DWR.

BUDGET

Woodard & Curran previously anticipated a grant agreement amendment would be needed at the end of this Proposition 1/68 grant. Costs for the grant agreement amendment can be incorporated into the same amendment that will move funds into grant administration category.



MEMORANDUM

TO: Delta-Mendota Subbasin Coordination Committee Members and Alternates

FROM: John Brodie, Water Resources Program Manager

DATE: January 18, 2022

RE: Confirming and Ranking Projects for Inclusion in the Delta-Mendota Subbasin Sustainable Groundwater Management Round 1 Grant Application

BACKGROUND

Representatives from the Delta-Mendota Subbasin (Subbasin) are pursuing funding through the Department of Water Resources' (DWR's) Sustainable Groundwater Management Act (SGMA) Round 1 funding. A Spending Plan totaling \$10M will be submitted to DWR for Subbasin projects by the February 18th deadline. DWR will then coordinate with Subbasin representatives to identify a final total of \$7.6M to support eligible Subbasin projects.

The Subbasin Coordination Committee approved project and budget categories for the \$10M total submission during meetings held in December 2021. Input was requested from each project proponent for projects listed under category 1) to confirm additional detail and project timelines. Representatives from Central California Irrigation District (CCID) and Del Puerto Water District (DPWD) requested the Orestimba Creek Recharge and Recovery Project be removed from consideration for this funding award, and recommended the Los Banos Creek Recharge and Recovery Project receive additional funding under this category.

Additional detail was also requested from each GSP Group to identify potential projects under category 3). Detail received by January 17th is included below.

- \$4M to projects listed in Prop 68 Implementation grant application
 - o Los Banos Creek Recharge and Recovery Project (SLWD, CCID and Grassland) – *recommendation for ~\$2M for this project*
 - o Flood Water Capture Project (Grassland)
 - o Cottonwood Creek Recharge Project (Aliso)
- \$2M development of monitoring sites
 - o Monitoring wells, subsidence monitoring sites and methods (based on recommendation from GSI project), and ISW sites, including stream gages

- \$4M recommendation to split remaining funding between GSP Groups for to-be-determined items consistent with the PSP
 - o Split equally between the six GSP Groups, a total of approximately \$665,000 will be available for each GSP Group

Project detail received from GSP Groups as of January 17th includes:

- Farmers Water District GSP (total budget ~\$1.75M)
 - o GSP Annual Report preparation assistance (includes DMS, monitoring data analysis, etc.)
 - o Monitoring data gaps (surface water monitoring and stream gage monitoring installation and instrumentation, 2 sites)
 - o Stakeholder Outreach and Coordination Activities (2022, 2023, and 2024)
 - o GSP Modifications (Response to DWR Comments and working with DM GSAs)
 - o 2025 GSP Development
 - o Water Bank investigation, documentation, and permitting, monitoring well and recovery well installation and equipment
- Fresno County GSP (total budget ~\$715,000)
 - o GSP Annual Report Preparation (includes DMS, monitoring data analysis, contouring, DMS upgrades, etc.)
 - o Data Gaps in GSP monitoring network
 - o Monitoring well installations and equipment \$200,000 (two sites in Management Area Beast and south of MWA.
 - o Stakeholder Outreach and Coordination Activities
 - o This task relates to coordination efforts with DM GSAs in GSP implementation activities and potential impacts on Fresno County sustainability efforts. This task also includes stakeholder outreach and communication efforts for GSP implementation activities to comply with SGMA requirements for stakeholder involvement and participation
 - o GSP Modifications (Response to DWR Comments and working with DM GSAs)
 - o 2025 GSP Development
 - o Proposition 218 process
- Northern & Central Delta-Mendota Region (NCDM) GSP (total budget \$665,000)
 - o North Valley Regional Recycled Water Project (NVRWP) – Ceres Component (DPWD)
 - o Lateral 4 North Reservoir Recapture and Recirculation Project (WSID)

ISSUES FOR DECISION

The Coordination Committee was identified as the project ranking committee for this funding opportunity during the December meeting. The Committee is requested to review and rank the Subbasin's projects using the DWR evaluation criteria as part of the Spending Plan development process. The Committee will rank projects during the January 18th meeting.

RECOMMENDATION

Staff recommends the Committee use the attached DWR project ranking criteria to evaluate identified projects for the Subbasin's application. This project review will support the Subbasin's application preparation, which is due to DWR by February 18th.

BUDGET

Committee input was previously received regarding cost share for application development (equal split of six GSP Groups) and administration (borne by project proponents proportional to grant award).

	A	B	C	D	E	F
1	Project / Component Evaluation Criteria					
2						
3	Section Name	Q#	Questions	Possible Points	Scoring Guidance	Actual Points
4	General	1	Was a description of the proposed Project or Component provided? Did it explain why this Project or Component was chosen over all others identified in the Plan in terms of benefits provided, communities served, measurable objectives, minimum thresholds, plan implementation timeline, and feasibility? If you feel a question component does not apply to your proposed project, please explain why it is not applicable. (Example "Measurable objective not applicable because project is planning only".) <ul style="list-style-type: none"> No funds will be awarded without clear justification for the proposed tasks/subtasks. 	4	4 - Fully addressed 3 - Mostly addressed, with minor details not included or unclear 2 - Mostly addressed, with significant details missing or unclear 1 - Marginally addressed 0 - Not addressed	
5	General - Imp Only	2-Imp	Does the Project or Component provide a description of quantifiable benefits? Was an explanation of the benefits that are expected to be realized from the Project or Component provided, along with how those benefits will be evaluated and quantified? <ul style="list-style-type: none"> To obtain full points, 3 or more quantifiable benefits must be identified and fully supported with backup documentation. 	4	4 - At least 3 quantifiable benefits with explanations and supporting documents 3 - Two quantifiable benefits with explanations and supporting documents 2 - Two quantifiable benefits lacking explanations and supportign documents 1 - One quantifiable benefit with explanations and supporting documents	
6	General - Planning Only	2-Plan	Does the Project Description describe a well-coordinated proposal including a GSP(s) that encompasses the entire basin or describes why a portion of the basin is not covered in the proposal? Does it describe how well the multiple GSA(s) surrounding and within the basin are working together?	4	4 - Fully addressed 3 - Mostly addressed, with minor details not included or unclear 2 - Mostly addressed, with significant details missing or unclear 1 - Marginally addressed 0 - Not addressed	
7	General	3	Does the Project or Component fully describe their plan for outreaching and engaging interested parties (e.g., residents, local leaders, non-profit representing Underrepresented Communities, etc.) located within Underrepresented Communities? Does the outreach and engagement include interested parties during all phases of the Project or Component (e.g., planning, design, and implementation)? Can interested parties provide input and be involved in the decision-making processes? <ul style="list-style-type: none"> To obtain full points, a minimum of three comment letters are required from the Underrepresented Communities. 	3	3 - Interested parties included on decision-making committees and fully engaged/involved in all aspects of the Project/Component 2 - Interested parties engaged/involved, but not included on decision-making committees 1 - Marginally addressed 0 - Not addressed	
8	General	4	Was there a regional and Project map(s) depicting the site location, current conditions, and benefitting areas? <ul style="list-style-type: none"> The information should be clear and easy to read. If not, the point will not be given. 	2	2 - Provided and all necessary information provided 1 - Provided but missing some information 0 - Not provided	
9	General	5	Does the project benefit an Underrepresented Community (-ies)? Was there a map(s) depicting the Underrepresented Community (-ies) that the project will benefit? Does the project benefit an SDAC? Was there a map(s) depicting the SDAC(s) that the project will benefit? Please provide the amount of funding that will benefit both the Underrepresented Community and SDAC.	3	3 - Projects benefits an SDAC(s) 2 - Project benefits Underrepresented Community 1 - Project partially benefits either 0 - Project does not benefit either	
10	General	6	Will the Project or Component positively impact issues associated with small water systems or private shallow domestic wells (e.g., groundwater contamination vulnerability, drawdown, etc.)? Was justification such as domestic well census results, water system maps, service area maps, etc. provided? Does the Project or Component help address the needs of the State Water Board's SAFER Program?	3	3 - Fully addressed 2 - Mostly addressed, with minor details not included or unclear 1 - Marginally addressed 0 - Not addressed	
11	General	7	How does the proposed Project or Component address the Human Right to Water (AB 685 Section 106.3)? How will the Project or Component support the established policy of the State that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes?	4	4 - Fully addressed 3 - Mostly addressed, with minor details not included or unclear 2 - Mostly addressed, with significant details missing or unclear 1 - Marginally addressed 0 - Not addressed	
12	Scope of Work	8	Did the proposal provide a description of the tasks/subtasks that will be completed as part of this grant Project? <ul style="list-style-type: none"> No funds will be awarded without clear justification for the proposed tasks/subtasks. 	3	3 - Fully addressed 2 - Mostly addressed, with minor details not included or unclear 1 - Marginally addressed 0 - Not addressed	
13	Budget	9	Is a budget summary table provided? Is the budget reasonable for the project? Is the budget table tasks/subtasks provided in the scope of work coincide with the tasks/subtasks in the budget and schedule tables? Is local cost share included (minimum of 5%)? Local cost share may include costs expended on projects before grant agreement date. <ul style="list-style-type: none"> Local cost share is not required but necessary to obtain full points. 	3	3 - Local cost share is provided, and budget is consistent and feasible 2 - Budget is consistent and feasible 1 - Budget is consistent but not feasible 0 - Not consistent and feasible	
14	Schedule	10	Is the tasks/subtask in the schedule table consistent with those listed in the budget table and within the description in the application? Is the schedule feasible?	1	1 - Consistent and feasible 0 - Not consistent and feasible	
15	Total Range of Possible Points			30		0
16	TOTAL FUNDING RECOMMENDED (rounded to nearest hundreth):				\$ -	

**Key Excerpts from SWRCB's August 2021 GSP Comment Letters
in comparison to DWR's 3 June 2021 GSP Determination and Notification Letters, and
Suggested Clarifications for the Northern & Central Delta-Mendota Region GSP**

This document provides a summary of key issues identified by the State Water Resources Control Board (SWRCB) in their 23 August 2021 comment letters on five additional Groundwater Sustainability Plans (GSPs) that were submitted to Department of Water Resources (DWR). The common issues identified by the SWRCB are added to our previous analysis of the comments made by DWR in their 3 June 2021 determination and notification letters¹ summarizing findings regarding four GSPs. This document also provides suggested revisions or clarifications to the Northern & Central Delta-Mendota Region GSP (NCDM Region GSP) in light of the DWR and SWRCB comments.

COMMON THEMES

Common themes articulated in the SWRCB letters that related to the technical aspects of the GSPs were generally consistent with DWR comments on the other GSPs, as follows:

Water Levels: The SWRCB strongly recommends that groundwater sustainability agencies (GSAs) conduct an independent analysis of the potential impacts of proposed sustainable management criteria (SMCs) on active domestic and public water supply wells (especially related to disadvantaged communities [DACs]) and implement a well mitigation program. SMCs that allow for a continued decline in groundwater levels, especially past the year 2040 when overdrafted basins are required to reach sustainability, are not considered sustainable or consistent with the Sustainable Groundwater Management Act (SGMA).

Water Quality: The GSP should outline the process the GSAs would use to decide whether GSP implementation caused or exacerbated a minimum threshold (MT) exceedance for water quality and take the “human right to water” legislation directly into account. All available data should be considered and if multiple constituents of concern (COCs) have been detected in a basin, the rationale for only developing SMCs for a select few COCs must be justified.

Subsidence. SMCs that allow for continued subsidence or a continued decline in groundwater levels, especially a decline in levels to below the Corcoran Clay, are not considered sustainable.

Interconnected Surface Water (ISW): The SWRCB generally felt that the GSAs had not sufficiently made the case that water levels could be used as a proxy for addressing ISW or sufficiently characterized the nature and extent of ISW issues or groundwater dependent ecosystems (GDEs). The SWRCB expects that an ISW monitoring network will include stream gauges.

Projects and Management Actions (PMAs): The SWRCB expressed concerns related to the likelihood of success of the planned PMAs, cautioned the GSAs on the intersection of water rights permitting with planned PMAs (e.g., for those projects that anticipate relying on new or amended surface water rights as a source of supply), strongly encouraged the GSAs to get involved in the well permitting processes, and encouraged incorporation of demand management into the PMA plan.

¹ On 3 June 2021, DWR issued determination letters to the GSAs for two basins (the Santa Cruz Mid-County Basin and the 180/400-foot Aquifer Subbasin) approving the basins' GSPs, and issued notification letters to the GSAs for two other basins (the Paso Robles Area Subbasin and the Cuyama Basin), identifying deficiencies in the basins' GSPs and initiating consultation with the GSAs.

Stakeholder Engagement: The SWRCB provided significant comments on stakeholder outreach and engagement (especially related to engagement of DACs and tribal interests). The SWRCB comments, however, did not address issues related to inter-basin or intra-basin coordination.

DETAILED COMMENTS

Excerpts from the June 2021 DWR GSP review letters (provided in the original version of this attachment) are shown in *italics* font with grey highlighting with the particular comment letter identified by basin in parentheses. Excerpts from the August 2021 SWRCB GSP comment letters are shown in *italics* font with no highlighting, with the particular comment letter identified by basin in parentheses. Below each excerpt is an analysis of the NCDM Region GSP and recommendation(s) related to the anticipated receipt of similar comments by DWR and/or the SWRCB. Revised or added recommendations based on the recent SWRCB letters are shown in blue font.

All Sustainability Indicators

Key Excerpts from DWR June 2021 GSP Review Letters

- *“The GSA’s definition needs to include a description of the processes and criteria relied upon to define undesirable results and must describe the effect of undesirable results on the beneficial uses and users of groundwater. From this definition, the GSA establishes minimum thresholds, which are quantitative values that represent groundwater conditions at representative monitoring sites that, when exceeded individually or in combination with minimum thresholds at other monitoring sites, may cause the basin to experience undesirable results.” (Cuyama, page 2)*
- *“GSA should describe the anticipated effects of the established minimum thresholds and undesirable results on the interests of beneficial uses and users and how the GSA determined that those thresholds would avoid undesirable results in the Basin.” (Cuyama, page 4)*
- *“Through review of the Plan and public comments, the Department determines that the GSA adequately responded to comments that raised credible technical or policy issues with the Plan, sufficient to warrant approval of the Plan at this time.” (Santa Cruz Mid-County, page 4; 180/400-Ft Aquifer, page 3)*
- *“Lastly, the Department’s review considers the comments submitted on the Plan and evaluates whether the GSA adequately responded to the comments that raise credible technical or policy issues with the Plan.” (180/400-Ft Aquifer, page 9 of DWR Staff Report)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *“Parts of the GSPs narrative definition of an undesirable result are vague, making it difficult to assess how well the proposed MTs represent groundwater conditions that the GSAs plan to avoid...” (Chowchilla, page 5)*

General Suggestions Pertaining to All Sustainability Indicators

- Provide explicit description of the point at which effects from conditions become “significant and unreasonable”, especially for the effects that are used to define Undesirable Results criteria, and provide a clear rationale for how the Minimum Thresholds are set to avoid those conditions.
- In the event that comments were received during the Public Draft GSP comment period and on the final adopted GSP, plan for and incorporate responses to those comments in any revisions to

the GSP (i.e., either in response to DWR’s forthcoming determination letter or in the next five-year GSP update).

Chronic Lowering of Groundwater Levels

Key Excerpts from DWR June 2021 GSP Review Letters

- *“Clarify how the criteria defining when undesirable results occur in the Basin (i.e., 30 percent exceedance of minimum thresholds for two consecutive years) was established, the rationale behind the approach, and why it is consistent with avoiding the significant and unreasonable effects identified by the GSA.” (Cuyama, page 4-5)*
- *“...estimate the number and kinds of wells expected to be impacted at the minimum thresholds identified in the GSP.” (Cuyama, page 5)*
- *“...discussion should be supported using best available information such as using State or county information on well completion reports to analyze the locations and quantities of domestic wells and other types of well infrastructure that could be impacted by groundwater management when implementing the GSP.” (Paso Robles, page 3-4)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *“... strongly recommends that the GSAs conduct an independent analysis of the potential impacts of proposed MOs and MTs... on active domestic and public water supply wells... and consider how those effects compare to a GSA’s definition of an undesirable result related to declining groundwater levels. In addition, the GSAs should estimate and describe the population served by the wells... which are not protected at MTs.” (Chowchilla, page 4; Merced, page 4; Tulare Lake, page 3)*
- *“the GSAs should adjust MTs ...or otherwise mitigate for impacts to wells... the GSAs could develop and implement a well mitigation plan that would lessen the significance of the impact by replacing or repairing domestic or drinking water system wells impacted by groundwater level declines as a project or management action.” (Chowchilla, page 4; Merced, page 4; Tulare Lake, page 3)*
- *“The GSP should evaluate MTs set below the Corcoran Clay and consider whether the MTs are appropriate” (Chowchilla, page 3; Merced, page 3)*
- *“In some locations, the ... MOs [are] close to or deeper than the MTs, which are based on well depths...” (Merced, page 5)*
- *“it appears that ... the GSP allows for continuing groundwater level declines past the year 2040 when the subbasin is required to reach sustainability. The GSP also appears to allow for continued long-term loss of groundwater storage and subsidence. State Water Board staff finds that the GSP’s conclusion that overdraft is sustainable is not consistent with the Sustainable Groundwater Management Act (SGMA)...” (Tulare Basin, Page 1)*

Current NCDM GSP Approach	Suggested Clarifications
<p>Effects on Beneficial Users (Section 6.3.1.1.4): “Dewatering of wells, inelastic land subsidence that can impact land use and water conveyance capacity, surface water depletions that can impact interconnected waterways, impact to productive</p>	<ul style="list-style-type: none"> • Define exact quantities of when the listed effects become “significant and unreasonable”, especially for the effects that are used to define Undesirable Results criteria.

<p>agriculture, increased pumping costs and need to dig deeper wells for municipalities, and potential needs to seek new water sources”.</p>	<ul style="list-style-type: none"> Consider developing a well mitigation plan that would lessen the impact of declines in groundwater levels by replacing or repairing domestic or drinking water system wells impacted by groundwater level declines.
<p>Definition of Undesirable Results (Section 6.3.1.1.2): “...Conditions are deemed ‘significant and unreasonable’, when groundwater elevations drop below the site-specific minimum threshold at 40 percent of representative monitoring wells in a principal aquifer in the Northern and Central Delta-Mendota Regions concurrently over a given year (7 out of 17 wells in the Upper Aquifer and/or 8 out of 18 wells in the Lower Aquifer)”.</p>	<ul style="list-style-type: none"> Clarify how the definition of the Undesirable Results will avoid specified “significant and unreasonable effects” (e.g., have to tie the 40% threshold back to the quantitative analysis of potential well impacts or subsidence and the effects on beneficial users).
<p>Setting Minimum Thresholds (Section 6.3.1.2): The Minimum Thresholds are “... set as the hydrologic low for wells perforated in the Upper Aquifer (above the Corcoran Clay) and 95 percent of the hydrologic low for wells perforated in the Lower Aquifer (below the Corcoran Clay) over the available hydrographs on record”.</p> <p>“Significant impacts are not anticipated to occur for drinking water users. Including domestic well users” when 2015 levels (historic lows) are used as minimum thresholds”.</p>	<ul style="list-style-type: none"> Clarify what is meant by “95 percent of the hydrologic low”, as it relates to the setting of Minimum Thresholds for wells perforated in the Lower Aquifer (below the Corcoran Clay). Provide quantitative justification for the MTs. For example, perform/describe a <u>well impact analysis</u> to estimate how many wells could be dewatered or how much subsidence could occur at the MTs. This should be coupled to the definition of “significant and unreasonable effects” that constitute an Undesirable Result in terms of effects on beneficial users. Confirm that the MTs are set at levels that would not allow water levels to fall below the Corcoran Clay layer. If the MTs would allow water levels to fall below the Corcoran Clay, consider raising the MTs to a higher level, above the Corcoran Clay.
<p>Measurable Objectives and Interim Milestones (Section 6.3.1.3) “The measurable objective is set at the lowest value of three parameters: the average historic seasonal high over the available hydrograph, Spring 2012 seasonal high, or Spring 2017 seasonal high.”</p>	<ul style="list-style-type: none"> Consider re-evaluating the SMCs for the RMS wells where MOs are set very close to the MTs (e.g., wells 03-003, 01-004).

Reduction of Groundwater Storage

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- “it appears that ... the GSP allows for continuing groundwater level declines past the year 2040 when the subbasin is required to reach sustainability. The GSP also appears to allow for continued long-term loss of groundwater storage and subsidence. State Water Board staff finds that the

	<p>Thresholds definition to refer to 1 January 2015 rather than December 2018.</p> <ul style="list-style-type: none"> The SWRCB questioned the use of the upper Secondary MCL (1,000 mg/L) as the minimum threshold for TDS. Consider providing a stronger argument for using 1,000 mg/L that considers the impacts to drinking water users.
<p>Undesirable Results Criteria (Section 6.3.3.1.2): “Groundwater quality exceeds Maximum Contaminant Levels (MCLs) or water quality objectives (WQOs) for TDS, nitrate, or boron over three (3) consecutive sampling events in non-drought years, or additional degradation of current groundwater quality where current groundwater quality exceeds the MCLs or WQOs”.</p>	<ul style="list-style-type: none"> Provide explicit definition of “non-drought years” so that conditions under which an Undesirable Result is possible are clearly defined. Unclear how many wells in the Representative Monitoring Network would have to exceed the MT criteria before there was an Undesirable Result. Provide quantitative justification for the definition of “significant and unreasonable effects” that constitute an Undesirable Result in terms of effects on beneficial users.

Land Subsidence

Key Excerpts from DWR June 2021 GSP Review Letters

- “Department staff believe there is sufficient data to indicate the potential of [interconnected surface water]² in the Subbasin that warrants and requires setting initial sustainable management criteria that may be reevaluated and potentially modified as new data become available. Not developing criteria limits the ability of Department staff to assess whether the Subbasin is being, or will be, sustainability managed within 20 years.” (Paso Robles, page 8)

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- “If water levels are allowed to drop below the Corcoran Clay, this would result in the near-surface unconfined aquifer being completely dewatered in this area. Additionally, subsidence could occur due to dewatering of the clays.” (Chowchilla, page 3; Merced, page 3)

Current NCDM GSP Approach	Suggested Clarifications
<p>Setting Minimum Thresholds (Section 6.3.5.2): For the WSID-PID MA: “Acceptable loss in distribution capacity (as based on a future capacity study) due to inelastic land subsidence resulting from groundwater pumping. Numerical values for this criterion to be determined based on data collection between 2020 and 2025”.</p>	<ul style="list-style-type: none"> Not setting any MTs for Land Subsidence in the WSID-PID MA (i.e., having them to-be-determined [TBD]) may not be acceptable to DWR. Suggest providing some interim MT that could be refined in the future. Explain in greater detail how the data to be collected between 2020 and 2025 (i.e., the capacity study) will be used to develop MTs for Land Subsidence.

² While the DWR comment excerpt shown here is related to Interconnected Surface Water, the same logic would presumably also apply to Land Subsidence.

	<ul style="list-style-type: none"> • Confirm that the groundwater level MTs are set at levels that would not allow water levels to fall below the Corcoran Clay.
<p>Undesirable Results Criteria (Section 6.3.5.1.2): For the WSID-PID MA: “Significant impacts occur to laterals from differential settlement that reduces the ability to deliver surface water supplies”.</p>	<ul style="list-style-type: none"> • Specify what amount of capacity reduction in the WSID-PID MA would be considered “significant and unreasonable”. Without specific metrics, it is difficult to assess what magnitude of impacts is considered reasonable.

Depletions of Interconnected Surface Water

Key Excerpts from DWR June 2021 GSP Review Letters

- *“If the GSAs cannot provide a sufficient, evidence-based justification for the absence of interconnected surface water, then they should develop sustainable management criteria, as required in the GSP Regulations, 41 based on best available information and science.” (Paso Robles, page 8)*
- *“Department staff find that the sustainable management criteria currently presented in the GSP (i.e., not defining and establishing criteria) is not commensurate with the level of understanding of the basin setting.” (Paso Robles, page 7)*
- *“If data are not available to support evaluation of the effects of established minimum thresholds on environmental uses and users, the GSA should clarify the strategy, mechanism, and timeline for acquiring that data and incorporating that data into management of the Basin.” (Cuyama, page 5)*
- *“The Plan explains that, due to uncertainty in surface water-groundwater modeling and the complexities involved with determining stream depletions due to groundwater use, the Basin will use shallow near stream groundwater levels as proxy for minimum thresholds of depletions of interconnected surface water. ... The Plan recognizes the limited monitoring data as a data gap and discusses the complexities of significantly correlating stream depletions and shallow groundwater levels. ... (T)he Plan states that to better characterize interconnections between surface water and groundwater, additional monitoring of shallow groundwater levels is needed in the upper reaches of Soquel Creek and on other creeks that indicate hydraulic connectivity to groundwater. ... Department staff also believe the MGA uses the best information and science available at the time of Plan development to understand hydraulic connectivity of surface water in the Basin and proposes actions to address the data gaps that appear reasonable.” (Santa Cruz Mid-County, page 24-25 of DWR Staff Report)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *“The GSP identifies interconnected stream reaches through numerical modeling but does not adequately characterize the locations, quantity, and timing of interconnected surface water (ISW) depletions.” (Merced, page 6)*
- *The GSP uses the groundwater elevation MTs developed to manage for decreasing groundwater levels as a proxy to also manage depletions of ISW in the Merced River; however, the GSP does not*

draw a direct link between the SMC for declining groundwater levels and undesirable results related to depletions of ISW.” (Merced, page 7; Eastern San Joaquin, page 5)

- *“State Water Board staff recommends that shallow groundwater level MTs for depletions of ISW be supported by considerations of the locations, quantity, and timing of depletions and impacts to beneficial users.” (Eastern San Joaquin, page 5)*
- *“Staff recommends the GSAs develop additional ISW monitoring sites in a timely manner, especially along the Merced and San Joaquin Rivers, and set meaningful SMC for depletions of ISW.” (Merced, page 7)*
- *“...the GSP also acknowledges data gaps and uncertainty regarding the hydraulic connectivity between shallow groundwater, deep groundwater and surface water. State Water Board staff recommends that the GSAs use data from additional shallow groundwater wells to clarify the Hydrogeologic Conceptual Model...if the additional data does not support the use of deeper groundwater elevations as a proxy for depletions of ISW, then State Water Board staff recommends that the GSP establish Sustainable Management Criteria based on the volume, rate, and timing of surface water depletions caused by groundwater pumping.” (North and South Yuba, page 3-4)*

Current NCDM GSP Approach	Suggested Clarifications
<p>Undesirable Results Definition (Section 6.3.6.1.2): “... when interconnected stretches of surface water are identified and a significant increase in the depletions of surface water is occurring as a result of groundwater pumping”.</p> <p>“The percent increase in depletions considered significant, identified herein as ‘X’, is to be determined from monitoring data to be collected between 2020 and 2025 and associated analysis of these data”.</p>	<ul style="list-style-type: none"> • Provide quantitative definition of when effects become “significant and unreasonable”. Without specific metrics, it is difficult to assess what magnitude of impacts is considered reasonable.
<p>Minimum Thresholds Definition (Section 6.3.6.2): “An X percent increase in surface water depletions along interconnected stretches of surface water as a result of groundwater pumping, where ‘X’ is the present increase in depletions to be determined from monition data collected between 2020 and 2025 and associated analyses of these data”.</p>	<ul style="list-style-type: none"> • Having MTs for Depletion of Interconnected Surface Water be to-be-determined (TBD) may not be acceptable to DWR. Suggest providing some interim MTs that could be refined in the future. • A strong technical case must be made that groundwater levels can be used as a proxy for setting SMCs for Interconnected Surface Water.
<p>Justification of Minimum Thresholds (Section 6.3.6.2): “Data collected from wells within the depletions of interconnected surface water monitoring network and stream gauges located along the San Joaquin River between 2020 and 2025 will be analyzed to determine the location, timing, and quantity of depletions over reaches of interconnected surface water within and/or adjoining the Northern and Central Delta-Mendota Regions”.</p>	<ul style="list-style-type: none"> • Given that the required infrastructure does not exist at this point, the GSAs will not be able to demonstrate that they collected data beginning in 2020 that will be used to develop MTs for Depletions of Interconnected Surface Water. • The GSAs should continue to prioritize development of the ISW monitoring network to enable collection of data to support SMC development, including wells and stream gauges.

GSP Review for Potential Deficiencies

GSP Title: Grassland GSP

Source of Concern	Topic	Potential Deficiency	Effectively Addressed?	Clarify	Proposed Solution
SWRCB	Basin Setting	Is there sufficient data to support that the shallow aquifer is not a primary (principal) aquifer?	No	GSP simply states the primary aquifers as being the "upper aquifer" and "lower aquifer". It acknowledges the shallow aquifer having significant impacts on the hydrology and groundwater management of the system.	Better clarify that the shallow aquifer is influential for hydrology; however, it is not a primary/principal aquifer because groundwater is not extracted from the shallow zone (<50 ft dtw). Further clarify that the primary/principal aquifers are considered the upper and lower aquifers. The DWR definition does note it as a quantity that supplies significant quantities to surface waters - this may be something we need to explore further. <u>USGS definition:</u> A principal aquifer is defined as a regionally extensive aquifer or aquifer system that has the potential to be used as a source of potable (drinkable) water. <u>DWR (SGMA) definition:</u> "Principal aquifers" refer to aquifers or aquifer systems that store, transmit, and yield significant or <u>economic</u> quantities of groundwater to wells, springs, or surface water systems.
DWR	Basin Setting	Was causation of groundwater level decline specified?	Yes	GSP clarifies how the upper aquifer stays generally stable due to requirements for maintaining the wetland systems that dominate the acreage. GSP also clarifies the lower aquifer decline as likely being attributed to nearby hotspots/extractors due to the minimal lower aquifer extractions in the Plan Area. GSP detailed the Merced County well permitting process.	
SWRCB	Well Permit	Did the GSP note that the GSA(s) will work with the county regarding new well permits? If so, did the GSP clarify how the GSA(s) will do so?	No	However, it doesn't clarify how the GSA(s) will work with the county regarding new permits.	Clarify that Merced County Delta-Mendota GSA has the opportunity for internal coordination regarding well permits (considering their role as the County) and that Grassland GSA can coordinate with MCDMGSA for information on new well permits. Clarify that a method for the County to notify MCDMGSA and GGSA when new or replacement well permits have been received is in the process of being developed, and is expected to be implemented by the 2025 (?). Info can be added in section 2.4.4. Permitting New or Replacement Wells.
SWRCB	Data gaps	Was there specificity on HOW the GSA(s) will resolve data gaps?	Partially	There is sufficient clarification on data gaps resolution of the lower aquifer. However, one of the most significant data gaps in the Grassland Plan Area was not addressed in Section 5.3.3. Plan to Fill Data Gaps: surface water interconnection and shallow aquifer flow to the SJR.	Clarify that the recently installed shallow monitoring wells may help to understand the shallow groundwater flow to the SJR. Also acknowledge more resources will be needed to fully understand the flow to the SJR, and the GSAs will seek funding opportunities to facilitate additional shallow monitoring leading to the SJR.
SWRCB	Water Budget	Were potential changes to the surface water diversions and pumping in response to the Bay-Delta Plan were incorporated into the water budget's future projections?	No	There is information on the value of surface water within the Plan Area and for adjacent districts. However, there is no mention of potential changes to surface water diversions and pumping in response to the Bay-Delta Plan.	Add a mention that surface water availability may be affected by the Bay-Delta Plan and may result in a consequential increase in groundwater pumping within and adjacent to the Plan Area. Clarify that the wetland conservation lands receive priority of surface water deliveries, and are less likely to be affected than their neighboring agriculturally-based Districts. Clarify that the GSAs will study trends throughout the implementation period and adjust the projected water budget, if needed.
SWRCB	Water Quality	Was 1,2,3-TCP evaluated in the basin setting? If it wasn't included as a constituent of concern, was it specified why?	No	It isn't an identified issue in the Plan Area - especially considering existing and historic land uses.	I don't think this one is necessary to include; however, we can clarify why it's a non-issue in the Plan Area. My concern is that doing so would open a pandora's box of "why not address other irrelevant constituents?"
SWRCB	Water Quality	Was the planned process to assess if GSP Implementation causes a water quality problem or minimum threshold (MT) exceedance clarified?	Partially	The process identified simply notes monitoring as usual and assessing results in relation to the threshold exceedance. However, HOW the GSAs will review water quality data in the implementation period to ensure no new constituents need to be added or if a problem is trending isn't addressed.	Clarify how the GSAs will monitor groundwater quality data, as GWD and the State/Fed refuges currently do and how the information will be considered
DWR	Interconnected SW	Did the GSP identify interconnected streams but did not quantify stream depletion? If that was not possible, did the GSP explain why?	No	The GSP identified interconnected streams but did not clarify WHY it was infeasible to quantify stream depletion (or increase, in the case of GGSA -> SJR).	Add a mention that the volume of stream depletion and/or increase is not feasible due to the lack of sufficient stream gauge data upstream, midstream, and downstream of the Plan Area and lack of shallow monitoring wells installed in a spatial pattern to assess groundwater.
SWRCB	Interconnected SW	Were locations of stream gauges noted? If there were none, was that clarified?	Partially	Figure 5-5 includes surface water monitoring (which includes delivery info), but the GSP lacked text clarifying that there are not sufficient count of stream gauges in the Plan Area to effectively estimate the volume of stream depletion (or increase).	Add text clarifying that there are not sufficient count of stream gauges in the Plan Area to effectively estimate the volume of stream depletion (or increase).
SWRCB	Water Rights	Did the GSP express reliance on new or amended water rights to reach sustainability? If so, was it clarified how it was feasible and reasonable to assume that the water rights can be obtained and implemented to correct groundwater decline within the planning horizon? (SWRCB finds it unreasonable for GSP to assume it can obtain new water rights or modifications to existing water rights.)	No	Not applicable. The GSP did not claim new or amended water rights would be needed to achieve sustainability.	

SWRCB	Domestic Pumping	Was a local assessment made of domestic wells?	Partially	Domestic wells were identified, but dismissed. Language included in the GSP is as follows: <i>There are a limited number of domestic wells within the Plan Area; most of which supply nonpotable water to temporary residences on seasonal recreational properties that have access to alternate supplies of potable water. The small number of domestic wells qualify as "de minimis extractors" under SGMA and will be excluded from certain regulatory requirements of the GSP.</i>	Add text clarifying that an assessment of the count of local wells was made, and clarify the count of these wells. If there is any additional information, such as well depth (or better, perforation depth), then this can be included.
SWRCB	Domestic Pumping	Was the local analysis of domestic wells used to inform the SMCs? (How would MT of water levels impact domestic wells?)	Yes	The following language was included regarding SMC consideration of beneficial users: <i>There are a limited number of domestic wells within the Grassland Plan Area, most of which supply non-potable water to seasonal recreational properties that use bottled water or similar alternate supplies for drinking and cooking. Naturally occurring salinity in the upper water table has historically made these supplies unsuitable for potable use. The small number of private domestic wells qualify as "de minimis extractors" under SGMA and will be managed by landowners as necessary.</i>	
SWRCB	Beneficial Use	Was a local analysis of small (non-municipal or state) water systems used to inform SMCs? (How would the MTs impact small water systems?)	No	There are no small community water systems within the Plan Area. However, this was never explicitly stated.	Clarify that there are no small community water systems within the Plan Area.
SWRCB	Beneficial Use	Was there clarification on how public water suppliers were considered in the engagement process? (If applicable)	No	Not applicable. No public water suppliers (small community water systems) in the Plan Area.	
SWRCB	Beneficial Use	Was an analysis of local federal or state recognized tribes performed? If so, was there clarity on how the GSP considered the interests of Tribes?	Partially	The GSP clarifies that no state or fed Tribes are in the Plan Area; however, it doesn't clarify how that was determined.	Clarify the source used to confirm no state or fed Tribes present in the Plan Area.
DWR	Beneficial Use	Did the qualitative definition of significant and unreasonable impacts (undesirable results) consider all beneficial users?	Yes	Section 4.3.4. Impacts to Beneficial Users includes clarification of the beneficial users that were considered. This may benefit from further clarification or better organization of the information.	May benefit from reorganization of the existing information, or expanding on existing points.
DWR		Was evidence provided that supports how the allowable groundwater level decline (MT) would not result in undesirable results?	Yes	By maintaining conditions, this supports a lack of undesirable results (which have not historically occurred). This message is echoed throughout the GSP.	
DWR		<u>Water levels:</u> Did the minimum threshold clarify the connection with the avoidance of significant and unreasonable impacts (undesirable results)?	Partially	The GSP indirectly acknowledges that the system will generally be maintained in the future, but the MT allows 20% reduction. The GSP needs clearer language stating that the 20% reduction is in alignment with generally maintaining conditions and would not result in significant and unreasonable impacts. Would need addition clarification on how that is known.	The GSP needs clearer language stating that the 20% reduction is in alignment with generally maintaining conditions and would not impact result in significant and unreasonable impacts. Would need addition clarification on how that is known.
DWR		<u>Water quality:</u> Did the minimum threshold clarify the connection with the avoidance of significant and unreasonable impacts (undesirable results)?	Partially	Acknowledges the 2,500 mg/L standard being in alignment with GWD's standard for water quality for that beneficial use; however, there are other beneficial uses in the Plan Area.	Clarify why that is an appropriate standard considering other groundwater uses in the area, and reiterate that domestic users in the Plan Area having historically used bottled water supplies for the seasonal recreation homes.
DWR		<u>Subsidence:</u> Did the minimum threshold clarify the connection with the avoidance of significant and unreasonable impacts (undesirable results)?	Yes	GSP Section 4.4.1. states the following: <i>...The most likely impact is that subsidence would affect the critical infrastructure conveying water used for agricultural and habitat irrigation. Historically, the Plan Area has not experienced subsidence-induced disruptions to conveyance capacity. The current rate at which subsidence is occurring within the Grassland Plan Area is neither currently yielding nor projected to yield significant and unreasonable undesirable results.</i>	
DWR	Minimum Threshold	<u>Interconnected surface water:</u> Did the minimum threshold clarify the connection with the avoidance of significant and unreasonable impacts (undesirable results)?	No	The GSP section on MT explains how groundwater levels can be used as a proxy, but doesn't explicitly describe how the MT is set at a point in which there will be no significant and unreasonable impacts.	Clarify how the MT is set at a point in which there will be no significant and unreasonable impacts to interconnected surface water, by generally maintaining the existing water level trends and therefore, the gradient to the SJR.
DWR		<u>Water levels:</u> Did the minimum threshold clarify how it considers beneficial users of groundwater?	No	GSP does not make a clear statement about how the 20% reduction does not impact all beneficial users.	The GSP needs clearer language stating that the 20% reduction is in alignment with generally maintaining conditions; therefore, considers the needs of beneficial users. Would need addition clarification on how that is known.
DWR		<u>Water quality:</u> Did the minimum threshold clarify how it considers beneficial users of groundwater?	No	the 2,500 mg/L TDS MT makes sense for the wetland beneficial use; however, the GSP does not explicitly acknowledge that. In addition, there are other beneficial uses in the Plan Area.	Clarify why that is an appropriate standard considering other groundwater uses in the area, and reiterate that domestic users in the Plan Area having historically used bottled water supplies for the seasonal recreation homes. Clarify why 2,500 mg/L TDS MT is appropriate for wetland beneficial

DWR		<u>Subsidence</u> : Did the minimum threshold clarify how it considers beneficial users of groundwater?	Yes	GSP Section 4.4.1. states the following: ... <i>The most likely impact is that subsidence would affect the critical infrastructure conveying water used for agricultural and habitat irrigation. Historically, the Plan Area has not experienced subsidence-induced disruptions to conveyance capacity... the minimum threshold was set to not exceed the historical annual average rate of subsidence from December 2011 to December 2018, defined at each of the three representative monitoring sites: 108 137 and 152</i>	
DWR		<u>Interconnected surface water</u> : Did the minimum threshold clarify how it considers beneficial users of groundwater?	No	The GSP section on MT explains how groundwater levels can be used as a proxy, but doesn't explicitly describe how the MT considers beneficial users. Section 4.3.5. acknowledges beneficial users, but neither section clarifies HOW beneficial users were considered relating to the interconnected surface	Clarify HOW beneficial users of groundwater wont be significantly impacted by the assigned MT for interconnected surface water.
DWR		<u>Water levels</u> : Did the measurable objective clarify the connection with the avoidance of significant and unreasonable impacts (undesirable results)?	Partially	GSP states the following, but does not state clarify why that means they were assigned to avoid significant and undesirable results. <i>Therefore, the interim goals and measurable objectives are reflective of a sustained system. The measurable objective is conservatively quantified as the representative groundwater level monitoring sites' recent historical (2000 to 2019) groundwater elevation low</i>	Clarify that the MO is reflective of a sustained system, and no significant and unreasonable impacts have historically occurred; therefore, no future significant and unreasonable impacts are expected.
DWR		<u>Water quality</u> : Did the measurable objective clarify the connection with the avoidance of significant and unreasonable impacts (undesirable results)?	No	The GSP does not clearly state that the 20% EC increase from historic conditions (MO) would not result in the avoidance of significant and unreasonable impacts.	Clarify that the 20% EC increase from historic conditions (MO) would not result in the avoidance of significant and unreasonable impacts. Consider that the historic conditions, and instances of elevated EC that no significant and unreasonable impacts occurred.
DWR		<u>Subsidence</u> : Did the measurable objective clarify the connection with the avoidance of significant and unreasonable impacts (undesirable results)?	Partially	The GSP states the following, but does not clearly state that there were no historic unreasonable impacts; therefore, continuing the existing rate is projected to avoid unreasonable impacts. <i>"The measurable objective is set to an average not to exceed the historical annual average rate of subsidence from December 2011 to December 2018 at each respective site."</i>	Clarify that there were no historic unreasonable impacts; therefore, continuing the existing rate is projected to avoid unreasonable impacts.
DWR	Measurable Objective	<u>Interconnected surface water</u> : Did the measurable objective clarify the connection with the avoidance of significant and unreasonable impacts (undesirable results)?	No	The GSP did not clarify that the interconnected surface water's MO would not cause an unreasonable impact to interconnected surface water, and how that was known.	Clarify that the interconnected surface water's MO would not cause an unreasonable impact to interconnected surface water, and how that was known.
DWR		<u>Water levels</u> : Did the measurable objective clarify how it considers beneficial users of groundwater?	Partially	Section 4.3.4. Impacts to Beneficial Users includes clarification of the beneficial users that were considered; however, the GSP lacks clarification on how beneficial users were considered in assigning the MO.	Clarify how the MO considered the different beneficial users (not just wetlands).
DWR		<u>Water quality</u> : Did the measurable objective clarify how it considers beneficial users of groundwater?	Partially	Section 4.3.4. Impacts to Beneficial Users includes clarification of the beneficial users that were considered; however, the GSP lacks clarification on how beneficial users were considered in assigning the MO.	Clarify how the MO considered the different beneficial users (not just wetlands).
DWR		<u>Subsidence</u> : Did the measurable objective clarify how it considers beneficial users of groundwater?	Partially	Section 4.3.4. Impacts to Beneficial Users includes clarification of the beneficial users that were considered; however, the GSP lacks clarification on how beneficial users were considered in assigning the MO.	Clarify how the MO considered the different beneficial users (not just wetlands).
DWR		<u>Interconnected surface water</u> : Did the measurable objective clarify how it considers beneficial users of groundwater?	Partially	Section 4.3.4. Impacts to Beneficial Users includes clarification of the beneficial users that were considered; however, the GSP lacks clarification on how beneficial users were considered in assigning the MO.	Clarify how the MO considered the different beneficial users (not just wetlands).

Potential Deficiencies of the Delta-Mendota GSP's

SJREC GSP:

- Numerical MO's on water levels were not included in the GSP submittal. Since then, the monitoring network module has been updated to include numeric values at DWR's request.
- Water Quality SMC was limited. DWR responded to another GSP and indicated that numeric standards for constituents should be established and management should include not lowering the water level below historic lows without justification that degraded water will not migrate.
- Impacts to interconnected surface water may need additional supporting documentation. The subbasin has proposed to fund monitoring wells near the river through the next round of grant funding. The SJREC GSP will not allow construction of wells that will cause a depletion of SW from the SJR. A draw-down analysis may need to be done to justify a setback distance from the river.
- Update Common Chapter to reflect MT for water levels as outlined in the table 39 of the SJREC GSP. We have Management areas with specific elevations as a trigger.
- Land Subsidence MO should state (0) and MT may need to be a numerical.
- May need more justification on our MT for water levels dropping below historic low by 25%.

COMMON CHAPTER

- DWR has indicated that our (6) GSP's need to be coordinated together. To date the letters I have reviewed focus on a few key issues: 1) justified SMC's on impacts, 2) impacts and mitigation needed for domestic wells, 3) cannot continue to have declining water levels, 4) need to have zero subsidence by 2040 or sooner, and 5) cannot rely on projects that may or may not be constructed, especially when a new water right is needed.
- Our subbasin is unique in that what Patterson does has no impact to the City of Mendota; Grasslands is drastically different than Aliso. As such, we have developed unique plans to address specific areas. We will likely need to take the next step coordinating our water budget expectations and SMC's.
- We will likely need to change our definition of UR to be better coordinated "Significant and unreasonable ... as defined by each GSP Group"
- Land Subsidence – My suggestion is that we have a subbasin criteria. This is probably the simplest SMC to be coordinated on. We may need to articulate that subsidence on the eastern side of the subbasin is caused by extractions from other subbasins.
- Our historic water budget indicates an overdraft of 50 TAF in the upper aquifer and 30 TAF in the lower aquifer. My gut is that these numbers are low.
 - If the water budgets are an accurate representation of what is expected, we are only overdrafting about 0.1 AF/acre.
 - Again if these water budgets are accurate, we should be able to have coordinated SMC for water levels and groundwater storage.
 - CCID has restricted groundwater pumping from our growers in parts of the district when water levels have declined. These years include: 2013-2016, 2021 and likely 2022.



MEMORANDUM

TO: Delta-Mendota Subbasin Coordination Committee Members and Alternates

FROM: John Brodie, Water Resources Program Manager

DATE: January 18, 2022

RE: Preparing for DWR Comments on Delta-Mendota Subbasin GSPs

BACKGROUND

The Department of Water Resources (DWR) issued an initial assessment letter to the Delta-Mendota Subbasin on December 9, 2021. DWR noted at that time that the six coordinated GSPs for the Subbasin will be deemed “incomplete” when a final determination letter and assessment is released later this month. When that letter from DWR is received by the Subbasin Point of Contact, GSP Groups will have 180 days to take recommended corrective actions to address identified deficiencies or risk mandatory oversight by the State Water Resources Control Board.

ISSUES FOR DECISION

Subbasin representatives will have the opportunity to meet with DWR SGMA Program Staff to discuss the perceived deficiencies and suggested corrective actions. The Subbasin’s designated Point of Contact for the SGMA Program suggests the first meeting between Subbasin representatives and DWR SGMA Program Staff be as detailed and direct as possible. The issue is to determine how best to achieve the comfort level necessary to promote pointed or possibly blunt discussion by both Subbasin representatives and Program Staff.

RECOMMENDATION

Staff suggests that if more than four Coordination Committee representatives wish to participate in this meeting, that GSP Groups request additional staff or consultant team members provide representation at this meeting.

ANALYSIS

Achieving the level of confidentiality needed for a direct and detailed discussion of the assessed Subbasin Plan weaknesses will demand an equivalent measure of sequestration not possible with unregulated attendance required under specific assembly conditions.

BUDGET

There are no budget implications for the Coordination Committee.

Funding Opportunities – Updated 1/2022

Organic Waste Recovery Program. Targets reduction in organic waste of 75% by 2025. \$57,000,000 available. Deadline 2/1/2022

Farm and Ranch Solid Waste Cleanup and Abatement Program. Grant program to pay for cleanup and prevention of illegal dumping on farm and ranch properties. CA Dept. of Resources & Recycling. \$350,000 available. Deadline 2/10/2022

**SGMA Implementation Round 1. A non-competitive funding opportunity for all critically over drafted subbasins. \$7.6 Million per basin. Must generally support SGMA implementation including both projects and GSP revisions in response to DWR comments. Some limitations apply. 2/18/2022 noon deadline to submit funding plan in DWR template.

Healthy Soils Program – Incentives. Similar to the demonstration project offering above, except it provides incentives to farmers to adopt conservation practices that improve soil health, sequester carbon, and reduce GHG. Total funding pool of \$67.5 Million. Deadline 2/25/2022.

CA Dept. of Parks and Recreation has seven categories of funding under their Habitat Conservation Fund including Wetlands and Riparian Habitat. \$6 Million is available through the program. The deadline is 3/1/2022.

IRWM Proposition 1 Round 2. Comments will be accepted on draft solicitation documents until 2/18/2022. An April deadline is anticipated. There is \$955,000 in funding for the San Joaquin River Funding area, no set amount for the Tulare Kern Funding area. A workshop for comments on the draft guidelines is scheduled 2/3/2022.

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