

**CHOWCHILLA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN (GSP)
REVISED GSP MATRIX**

Deficiency Number	Deficiency Identified by DWR	Corrective Action Recommended by DWR	Sections Where Deficiency was Primarily Addressed in the Revised GSP	How Deficiency was Addressed in the Revised GSP	Information Learned from DWR During Consultation
1	The GSP does not provide sufficient information to support the selection of the chronic lowering of groundwater levels Sustainable Management Criteria (SMC).	The GSP must provide sufficient information to support the selection of the chronic lowering of groundwater levels SMC.	<ul style="list-style-type: none"> • 3.3.1 (groundwater level Minimum Thresholds (MTs)) • 3.4.1 (groundwater level Undesirable Results (URs)) • ES-3 (summary) • Appendix 3.A (hydrographs) • Appendix 3.C (Domestic Well Mitigation Program (Mitigation Program) economic analysis) • Appendix 3.D (Mitigation Program Memorandum of Understanding (MOU)) 	<p>The revised GSP includes additional discussion of the considerations and analyses that went into selection of the chronic lowering of groundwater levels SMC, <u>including updates regarding the GSAs' specific plans for implementing the Domestic Well Mitigation Program (Mitigation Program).</u></p> <p>The GSAs in the Chowchilla Subbasin have expressed and formalized their <u>clear commitment to fund and implement the Mitigation Program beginning no later than January 1, 2023.</u> GSA staff and representatives have already made substantial and material progress toward program development and implementation by creating and executing an MOU (Appendix 3.D).</p>	<ul style="list-style-type: none"> • The GSAs must provide more explanation of the Mitigation Program and rationale for setting SMC in coordination with the Mitigation Program. • If groundwater level decline is occurring, the GSP must have an implementable plan to address those impacts.
1.a	Chowchilla Subbasin GSP's explanation of the chronic lowering of groundwater levels SMC, particularly for Undesirable Results (URs) and Minimum Thresholds (MTs), does not include sufficient detail and analysis as required by the GSP Regulations.	The GSP should support the explanation by describing the specific significant and unreasonable effects on groundwater supply uses and users that the GSA intends to avoid. The GSP should include specific details about those effects, supported by the best available information and science.	<ul style="list-style-type: none"> • 3.3.1 (groundwater level MTs) • 3.4.1 (groundwater level URs) • 2.2.2.7 (workplan) • Appendix 3.A (hydrographs) • Appendix 3.C (Mitigation Program economic analysis) • Appendix 3.D (Mitigation Program MOU) 	<p>The revised GSP addresses this deficiency by:</p> <ul style="list-style-type: none"> • Providing additional explanation of the considerations and decisions to set MTs for chronic lowering of groundwater levels, including: <ul style="list-style-type: none"> ○ Stakeholder input and discussions of what constitutes existing and future URs (stakeholders expressed a clear desire to protect domestic well users, but also saw a need to protect local agricultural economy – the economic lifeblood of the region – while GSP implementation ramps up) ○ Economic analyses and considerations of the tradeoffs of setting MTs at different levels relative to the cost of implementing a Mitigation Program (Appendix 3.C) ○ Updates regarding the GSAs' <u>clear commitment to fund and implement the Mitigation Program beginning no later than January 1, 2023</u> (Appendix 3.D). ○ Anticipated completion of a groundwater levels workplan by October 1, 2022. • Revising and providing more explanation of the MTs to be more conservative and protective of groundwater levels (described in Table 3-14 and shown in Appendix 3.A; now based on groundwater levels during a modeled 6-year drought) 	<ul style="list-style-type: none"> • Because the SMC were established with the understanding that undesirable results are occurring/will occur for domestic well users, acceptability of the GSP hinges on implementation of the Mitigation Program. • The GSAs need to clearly address and assess URs for municipal service wells, public supply wells, and agricultural wells.
1.b	The GSP does not appear to base its MTs on groundwater levels that indicate "a depletion of supply at a given location that may lead to URs," as required by the GSP Regulations.	The GSP must explain how the chronic lowering of groundwater level MTs, defined at representative monitoring sites, represent groundwater levels that indicate a depletion of supply at that location that may lead to URs.	<ul style="list-style-type: none"> • 3.3.1 (groundwater level MTs) • 3.4.1 (groundwater level URs) • Appendix 3.A (hydrographs) • Appendix 3.C (Mitigation Program economic analysis) • Appendix 3.D (Mitigation Program MOU) 	<p>The revised GSP addresses this deficiency by:</p> <ul style="list-style-type: none"> • Revising and providing more explanation of the MTs to be more conservative and protective of groundwater levels (described in Table 3-14 and shown in Appendix 3.A; now based on groundwater levels during a modeled 6-year drought). • Providing additional explanation of the considerations and decisions to set MTs and define URs for chronic lowering of groundwater levels (described above). <p>Recognizing that groundwater levels are anticipated to decline during the GSP Implementation Period while projects are implemented and demand reduction programs expand, the GSAs</p>	<ul style="list-style-type: none"> • The GSAs need to clearly address and assess undesirable results for municipal service wells, public supply wells, and agricultural wells. • Subbasin conditions can temporarily exceed MTs on the way to achieving sustainable conditions. • Because the SMC were established with the understanding that

**CHOWCHILLA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN (GSP)
REVISED GSP MATRIX**

Deficiency Number	Deficiency Identified by DWR	Corrective Action Recommended by DWR	Sections Where Deficiency was Primarily Addressed in the Revised GSP	How Deficiency was Addressed in the Revised GSP	Information Learned from DWR During Consultation
				are committed to funding and implementing a Mitigation Program beginning no later than January 1, 2023 (Appendix 3.D) and continuing until groundwater sustainability is achieved.	undesirable results are occurring/will occur for domestic well users, acceptability of the GSP hinges on implementation of the Mitigation Program.
1.c	The GSP fails to examine the relationship between allowable groundwater level declines and land subsidence in the Subbasin.	The GSP should clearly explain the relationship between the chronic lowering of groundwater levels MTs and those developed for subsidence and explain how allowing continued lowering of groundwater levels would avoid URs for subsidence.	<ul style="list-style-type: none"> • 3.3.1 (groundwater level MTs) • 3.3.3 (subsidence MTs) • 2.2.2.4 (Relationship between groundwater levels and historical subsidence) • 2.2.2.7 (workplan) 	<p>The revised GSP addresses the relationship between SMC for groundwater levels and subsidence through text revisions in Section 3.3.1 and in Section 3.3.3.</p> <p>Additional text has also been added to Section 2.2.2.4 to describe how historical subsidence in the Chowchilla Subbasin (and more regionally in the San Joaquin Valley) is related to declining groundwater levels in the Lower Aquifer. The revised GSP also includes an overview of a groundwater levels workplan and a subsidence workplan that is anticipated to be completed by October 1, 2022.</p>	<ul style="list-style-type: none"> • Groundwater levels may be acceptable for use as proxy for subsidence with sufficient demonstration of the relationship between groundwater levels and subsidence. • DWR understands that data gaps exist. Creating the framework for subsequent detailed work plans that will collect more data to improve understanding of subsidence conditions would be helpful.
1.d	Without commitment to the Potential Domestic Well Mitigation Program or an analysis of how groundwater level MTs may affect land subsidence included in the GSP, Department staff cannot determine whether the SMC for chronic lowering of groundwater levels will avoid conditions that cause groundwater level conditions at private domestic wells that cannot be mitigated or interfere with other sustainability indicators	Department staff recommend the GSAs include additional information regarding the implementation of the mitigation program in responding to this deficiency. In addition to domestic wells, the GSAs should explain whether and how the mitigation program extends to other drinking water users that rely on shallow wells, such as public water systems and state small water systems.	<ul style="list-style-type: none"> • 3.3.1 (groundwater level MTs introductory discussion) • Appendix 3.D (Mitigation Program MOU) 	The revised GSP includes additional discussion of the GSAs' specific plans for implementing the Mitigation Program. The GSAs in the Chowchilla Subbasin have expressed and formalized their clear commitment to fund and implement the Mitigation Program beginning no later than January 1, 2023 and continuing until groundwater sustainability is achieved. GSA staff and representatives have already made substantial and material progress toward Program development and implementation by creating and executing an MOU (Appendix 3.D).	<ul style="list-style-type: none"> • The Mitigation Program must be implemented. • The GSAs must provide more explanation of the Mitigation Program and rationale for setting SMC in coordination with the Mitigation Program. • Because the SMC were established with the understanding that undesirable results are occurring/will occur for domestic well users, the acceptability of the GSP hinges on implementation of this Program to mitigate for the most vulnerable users. • By the end of the 180-day period, the GSAs must set clear intentions and have a specific plan and timeline for implementing the Mitigation Program, e.g., having a fully executed MOU in place by the time the revised GSP is submitted.
2	The GSP does not provide sufficient information to support the selection of land subsidence SMC.	The GSP must provide sufficient information to support the selection of the subsidence SMC.	<ul style="list-style-type: none"> • 3.2.3 (subsidence Measurable Objectives (MOs)) • 3.3.3 (subsidence MTs) • 3.4.3 (subsidence URs) • ES-3 (summary) 	The revised GSP contains revised SMC for land subsidence, including new SMC for land subsidence in the Eastern Management Area (MA) and provides more explanation of the SMC (described in Table 3-14 and throughout Chapter 3).	<ul style="list-style-type: none"> • The GSP should clarify the nexus between the MTs and URs in the Western Management Area (MA). • The GSP should set formal SMC in the Eastern MA, even if they are considered "interim," acknowledging

**CHOWCHILLA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN (GSP)
REVISED GSP MATRIX**

Deficiency Number	Deficiency Identified by DWR	Corrective Action Recommended by DWR	Sections Where Deficiency was Primarily Addressed in the Revised GSP	How Deficiency was Addressed in the Revised GSP	Information Learned from DWR During Consultation
			<ul style="list-style-type: none"> • 2.2.2.4 (Relationship between groundwater levels and historical subsidence) • 2.2.2.7 (workplan) • Appendix 3.E (Chowchilla Subbasin Infrastructure Assessment) • Appendix 3.F (Subsidence Control Measures Agreement) 	<p>The revised GSP also includes additional discussion of the considerations and analyses that went into selection of the subsidence SMC, including:</p> <ul style="list-style-type: none"> • Analyses of critical infrastructure, their location/ orientation, their impacts from historical subsidence, and their potential sensitivity to future subsidence (Appendix 3.E). • Ongoing subsidence mitigation measures successfully implemented by landowners in the Western MA (since 2017) and recharge projects targeted toward areas where historical subsidence has been greatest (Section 3.3.3 and Appendix 3.F). • Additional information about how historical subsidence in the Chowchilla Subbasin (and more regionally in the San Joaquin Valley) is related to declining groundwater levels in the Lower Aquifer. • Anticipated completion of a subsidence workplan by October 1, 2022 	<p>data gaps and that these SMC will be revisited.</p> <ul style="list-style-type: none"> • Modeling (during the 180-day consultation period) is not necessary to establish or support SMC. • SMC can be changed in the five-year GSP updates with justification from additional data collection and improved basin understanding.
2.a	The GSP does not define or identify what infrastructure is susceptible to impacts from land subsidence.	The GSP should be revised to include discussion of land surface beneficial uses and users in the Subbasin (e.g., infrastructure such as canals or levees) that may be susceptible to substantial interference as a result of continued subsidence.	<ul style="list-style-type: none"> • 3.3.3 (subsidence MTs) • 3.4.3 (subsidence URs) • 2.2.2.7 (workplan) • Appendix 3.E (Chowchilla Subbasin Infrastructure Assessment) 	The revised GSP includes additional discussion of land surface beneficial uses and users, including analyses of critical infrastructure, their location/orientation, their impacts from historical subsidence, and their potential sensitivity to future subsidence (Appendix 3.E). The revised GSP also includes an overview of a subsidence workplan that is anticipated to be completed by October 1, 2022.	<ul style="list-style-type: none"> • The GSP should clearly define the type/location of critical infrastructure and analyze/explain the potential effects of subsidence on critical infrastructure. • DWR understands that data gaps exist. Creating the framework for subsequent detailed work plans that will collect more data to improve understanding of subsidence conditions would be helpful.
2.b	The GSP fails to provide adequate evidence to evaluate the correlation between groundwater levels and subsidence, specifically with regard to potential subsidence caused by groundwater levels falling below historical lows,	The GSAs should provide supporting information for using groundwater levels as a proxy for subsidence in the Western MA.	<ul style="list-style-type: none"> • 3.3.3 (subsidence MTs) • 3.4.3 (subsidence URs) • 2.2.2.4 (Relationship between groundwater levels and historical subsidence) 	<p>The revised GSP contains revised SMC for land subsidence and provides more explanation of the SMC (described in Table 3-14 and throughout Chapter 3).</p> <p>The revised GSP also includes additional information about how historical subsidence in the Chowchilla Subbasin (and more regionally in the San Joaquin Valley) is related to declining groundwater levels in the Lower Aquifer.</p>	<ul style="list-style-type: none"> • Groundwater levels may be acceptable for use as proxy for subsidence with sufficient demonstration of the relationship between groundwater levels and subsidence. • The GSP should clearly analyze/explain the relationship between subsidence and the Corcoran clay layer, as relevant to the processes that were used to set the subsidence SMC.

**CHOWCHILLA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN (GSP)
REVISED GSP MATRIX**

Deficiency Number	Deficiency Identified by DWR	Corrective Action Recommended by DWR	Sections Where Deficiency was Primarily Addressed in the Revised GSP	How Deficiency was Addressed in the Revised GSP	Information Learned from DWR During Consultation
2.c	The GSP does not provide an analysis of how much subsidence may be expected if up to 50 percent of representative monitoring site wells exceed their established MTs.	The GSP should be revised to include analysis that demonstrates a significant correlation between groundwater levels, which are allowed to decline below the historical low at up to 50 percent of monitoring sites, and land subsidence.	<ul style="list-style-type: none"> • 3.3.3 (subsidence MTs) • 3.4.3 (subsidence URs) • 2.2.2.4 (Relationship between groundwater levels and historical subsidence) • 2.2.2.7 (workplan) 	The revised GSP contains revised SMC for land subsidence (described in Table 3-14 and throughout Chapter 3) and includes additional information about how historical subsidence in the Chowchilla Subbasin (and more regionally in the San Joaquin Valley) is correlated to declining groundwater levels in the Lower Aquifer. The revised GSP also includes an overview of a subsidence workplan that is anticipated to be completed by October 1, 2022.	<ul style="list-style-type: none"> • The GSP should clarify the nexus between the MTs and URs in the Western Management Area (MA). • The GSP should provide some estimate of anticipated/expected residual and/or additional subsidence that may occur during the GSP implementation period. • DWR understands that data gaps exist. Creating the framework for subsequent detailed work plans that will collect more data to improve understanding of subsidence conditions would be helpful.
2.d	The GSP does not provide an analysis of how much land subsidence may be expected if groundwater levels exceed their historical lows in the Lower Aquifer of the Western MA.	The GSAs should evaluate the potential for subsidence impacts (i.e., substantial interference for surface land uses) related to any allowable further groundwater level decline.	<ul style="list-style-type: none"> • 2.2.2.4 (Relationship between groundwater levels and historical subsidence) • 2.2.2.7 (workplan) • Appendix 3.E (Chowchilla Subbasin Infrastructure Assessment) • Appendix 3.F (Subsidence Control Measures Agreement) 	<p>The revised GSP contains revised SMC for land subsidence (described in Table 3-14 and throughout Chapter 3).</p> <p>The revised GSP also includes additional discussion of the considerations and analyses that went into selection of the subsidence SMC and their potential impacts on land use beneficial uses and users, including:</p> <ul style="list-style-type: none"> • Analyses of critical infrastructure, their location/ orientation, their impacts from historical subsidence, and their potential sensitivity to future subsidence (Appendix 3.E). • Ongoing subsidence mitigation measures successfully implemented by landowners in the Western MA (since 2017) and recharge projects targeted toward areas where historical subsidence has been greatest (Section 3.3.3 and Appendix 3.F). • Additional information about how historical subsidence in the Chowchilla Subbasin (and more regionally in the San Joaquin Valley) is related to declining groundwater levels in the Lower Aquifer. • Anticipated completion of a subsidence workplan by October 1, 2022 	<ul style="list-style-type: none"> • The GSP should clarify the nexus between the MTs and URs in the Western Management Area (MA). • The GSP should provide some estimate of anticipated/expected residual and/or additional subsidence that may occur during the GSP implementation period. • Zero subsidence is not a realistic expectation; however, the GSP needs an assessment and narrative discussion of anticipated additional subsidence (whether that be considered “residual” or “renewed” and what that means for critical infrastructure). • Interim milestones are a way to account for subsidence expectations during the GSP implementation period (e.g., interim milestones reflect a declining rate of subsidence).
2.e	The GSAs provided no discussion or evidence for why they selected 0.25 feet per year as the MT in the Eastern MA. The GSAs should document their understanding, through efforts such as coordination and technical studies, of the	The GSAs should revise their MTs and MOs for land subsidence in the Eastern MA to reflect the intent of SGMA that subsidence be avoided or minimized once sustainability is achieved. Department staff suggest that the Eastern MA MT be revised and set	<ul style="list-style-type: none"> • 3.2.3 (subsidence Measurable Objectives (MOs)) • 3.3.3 (subsidence MTs) • 3.4.3 (subsidence URs) 	The revised GSP contains revised SMC for land subsidence, including revised MTs and MOs for land subsidence in the Eastern MA (described in Table 3-14 and throughout Chapter 3).	<ul style="list-style-type: none"> • Zero subsidence is not a realistic expectation; however, the GSP needs an assessment and narrative discussion of anticipated additional subsidence (whether that be considered “residual” or “renewed” and what that means for critical infrastructure).

**CHOWCHILLA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN (GSP)
REVISED GSP MATRIX**

Deficiency Number	Deficiency Identified by DWR	Corrective Action Recommended by DWR	Sections Where Deficiency was Primarily Addressed in the Revised GSP	How Deficiency was Addressed in the Revised GSP	Information Learned from DWR During Consultation
	amount of subsidence that would be significant and unreasonable, because it would substantially interfere with groundwater and land surface beneficial uses and users.	commensurate with expected residual subsidence.			<ul style="list-style-type: none"> DWR understands that data gaps exist. Creating the framework for subsequent detailed work plans that will collect more data to improve understanding of subsidence conditions would be helpful.
2.f	The rates at which projects and management actions are implemented should be consistent with the cumulative subsidence that the GSAs determine need to be avoided, as informed by the understanding of potential impacts or interference to beneficial uses and users of groundwater and surface land uses.	The GSAs should explain how implementation of the projects and management actions is consistent both with achieving the long-term avoidance or minimization of subsidence	<ul style="list-style-type: none"> Appendix 3.E (Chowchilla Subbasin Infrastructure Assessment) Appendix 3.F (Subsidence Control Measures Agreement) 	<p>The revised GSP contains revised SMC for land subsidence (described in Table 3-14 and throughout Chapter 3).</p> <p>The revised GSP also includes additional discussion of the considerations and analyses that went into selection of the subsidence SMC and their potential impacts on land use beneficial uses and users, including:</p> <ul style="list-style-type: none"> Analyses of critical infrastructure, their location/ orientation, their impacts from historical subsidence, and their potential sensitivity to future subsidence (Appendix 3.E). Ongoing subsidence mitigation measures successfully implemented by landowners in the Western MA (since 2017) and recharge projects targeted toward areas where historical subsidence has been greatest (Section 3.3.3 and Appendix 3.F). 	<ul style="list-style-type: none"> The GSP should include additional descriptions of actions toward subsidence mitigation since GSP adoption (e.g., updates to the subsidence mitigation agreement executed by certain landowners in the Western MA).
3	The GSP does not provide sufficient information to support the determination that interconnected surface water or URs related to depletions of interconnected surface water are not present and are not likely to occur in the subbasin.	The GSP must provide sufficient information to support the determination that interconnected surface water or URs related to depletions of interconnected surface water are not present and are not likely to occur in the subbasin, or the GSP must include SMC for interconnected surface water.	<ul style="list-style-type: none"> 3.2.5 (interconnected surface water MOs) 3.3.5 (interconnected surface water MTs) 3.4.5 (interconnected surface water URs) ES-3 (summary) 2.2.2.5 (groundwater - surface water interactions) 2.2.2.7 (workplan) 	<p>The revised GSP contains new SMC for depletion of interconnected surface water (described in Table 3-14 and throughout Chapter 3).</p> <p>The revised GSP also includes additional discussion of the considerations and analyses that went into selection of the interconnected surface water SMC, including:</p> <ul style="list-style-type: none"> Updated analyses of groundwater - surface water interactions, including the percent of time with surface water – groundwater connection (the basis for the depletion of interconnected surface water SMC) Anticipated completion of an interconnected surface water workplan by October 1, 2022 	<ul style="list-style-type: none"> If data gaps exist, the GSAs should note those and a preliminary timeline/ schedule for filling those. DWR recognizes the high uncertainty related to the interconnected surface water sustainability indicator as implied by regulations that indicate SWRCB will not intervene until 2025 for this sustainability indicator.
3.a	The GSP states that the analysis indicated the San Joaquin River, along the western boundary of the Subbasin, was connected through 2008 but that from 2009 to 2016 the groundwater levels were “generally below (and apparently disconnected from)” the river. 72 The GSP lacks adequate	The GSP must be revised to include a clear and comprehensive analysis of the potential for interconnected surface water to be present along the San Joaquin River in the Subbasin. The revision should provide data and complete analysis to support any conclusion regarding the	<ul style="list-style-type: none"> 3.2.5 (interconnected surface water MOs) 3.3.5 (interconnected surface water MTs) 3.4.5 (interconnected surface water URs) 2.2.2.5 (groundwater - surface water interactions) 2.2.2.7 (workplan) 	<p>The revised GSP contains new SMC for depletion of interconnected surface water on the San Joaquin River (described in Table 3-14 and throughout Chapter 3).</p> <p>The revised GSP also includes additional discussion of the considerations and analyses that went into selection of the interconnected surface water SMC, including:</p> <ul style="list-style-type: none"> Updated discussion of groundwater - surface water interactions along the San Joaquin River Anticipated completion of an interconnected surface water workplan by October 1, 2022. 	<ul style="list-style-type: none"> In terms of the temporal aspect of interconnected surface water, the historical percent of time a groundwater/surface water connection exists (e.g., primarily during winter/spring of wet years) should not decrease in the future The GSP should analyze whether future groundwater management will deplete any possible connection, and

**CHOWCHILLA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN (GSP)
REVISED GSP MATRIX**

Deficiency Number	Deficiency Identified by DWR	Corrective Action Recommended by DWR	Sections Where Deficiency was Primarily Addressed in the Revised GSP	How Deficiency was Addressed in the Revised GSP	Information Learned from DWR During Consultation
	documentation of the analysis used for the development of this conclusion.	presence or absence of interconnected surface water.			whether Groundwater Dependent Ecosystems (GDEs) are affected.
3.b.	The GSP provides and references maps showing the depth to shallow groundwater for 2014 and 2016 but does not provide details regarding the wells selected for these maps.	GSA's review information from adjacent GSPs, as described above. If the GSA's find that there is insufficient data to justify the conclusion that interconnected surface water is, or is not, present in the Subbasin, a plan and schedule should be developed and submitted to the Department to address this data gap.	<ul style="list-style-type: none"> • 3.2.5 (interconnected surface water MOs) • 3.3.5 (interconnected surface water MTs) • 3.4.5 (interconnected surface water URs) • 2.2.2.5 (groundwater - surface water interactions) • 2.2.2.7 (workplan) 	<p>The revised GSP contains new SMC for depletion of interconnected surface water on the San Joaquin River (described in Table 3-14 and throughout Chapter 3).</p> <p>The revised GSP also includes additional discussion of the considerations and analyses that went into selection of the interconnected surface water SMC, including:</p> <ul style="list-style-type: none"> • Updated discussion of groundwater - surface water interactions along the San Joaquin River • Anticipated completion of an interconnected surface water workplan by October 1, 2022. 	<ul style="list-style-type: none"> • If data gaps exist, the GSA's should note those and a preliminary timeline/schedule for filling those. • The GSA's should create the framework for a detailed work plan for filling interconnected surface water data gaps, including: additional locations for shallow monitoring wells, river stage recorders paired with monitoring wells, incorporating Airborne Electromagnetic (AEM) data when available, and thalweg surveys.
3.c	GSP does not provide the stream thalweg depths that were used for comparison to the groundwater levels, nor does it quantify what "relatively far below" the thalweg is.	Should data indicate the presence of interconnected surface water, the GSA's should develop SMC, as required in the GSP Regulations, based on best available information and science.	<ul style="list-style-type: none"> • 3.2.5 (interconnected surface water MOs) • 3.3.5 (interconnected surface water MTs) • 3.4.5 (interconnected surface water URs) • 2.2.2.5 (groundwater - surface water interactions) • 2.2.2.7 (workplan) 	<p>The revised GSP contains new SMC for depletion of interconnected surface water on the San Joaquin River (described in Table 3-14 and throughout Chapter 3).</p> <p>The revised GSP also includes additional discussion of the considerations and analyses that went into selection of the interconnected surface water SMC, including:</p> <ul style="list-style-type: none"> • Updated discussion of groundwater - surface water interactions along the San Joaquin River • Anticipated completion of an interconnected surface water workplan by October 1, 2022. 	<ul style="list-style-type: none"> • If data gaps exist, the GSA's should note those and a preliminary timeline/schedule for filling those. • The GSA's should create the framework for a detailed work plan for filling interconnected surface water data gaps, including: additional locations for shallow monitoring wells, river stage recorders paired with monitoring wells, incorporating Airborne Electromagnetic (AEM) data when available, and thalweg surveys.
3.d	Department staff do not believe the GSA's sufficiently demonstrate that interconnected surface water or URs related to depletions of interconnected surface water are not present and are not likely to occur in the Subbasin	The GSA's should evaluate and disclose, sufficiently and thoroughly, the potential effects of the GSP's SMC for depletion of interconnected surface water on beneficial uses of the interconnected surface water and on groundwater uses and users.	<ul style="list-style-type: none"> • 3.2.5 (interconnected surface water MOs) • 3.3.5 (interconnected surface water MTs) • 3.4.5 (interconnected surface water URs) • 2.2.2.5 (groundwater - surface water interactions) • 2.2.2.7 (workplan) 	<p>The revised GSP contains new SMC for depletion of interconnected surface water on the San Joaquin River (described in Table 3-14 and throughout Chapter 3).</p> <p>The revised GSP also includes additional discussion of the considerations and analyses that went into selection of the interconnected surface water SMC, including:</p> <ul style="list-style-type: none"> • Updated discussion of groundwater - surface water interactions along the San Joaquin River • Anticipated completion of an interconnected surface water workplan by October 1, 2022. 	<ul style="list-style-type: none"> • In terms of the temporal aspect of interconnected surface water, the historical percent of time a groundwater/surface water connection exists (e.g., primarily during winter/spring of wet years) should not decrease in the future. • The GSP should analyze whether future groundwater management will deplete any possible connection, and

**CHOWCHILLA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN (GSP)
REVISED GSP MATRIX**

Deficiency Number	Deficiency Identified by DWR	Corrective Action Recommended by DWR	Sections Where Deficiency was Primarily Addressed in the Revised GSP	How Deficiency was Addressed in the Revised GSP	Information Learned from DWR During Consultation
					<p>whether Groundwater Dependent Ecosystems (GDEs) are affected.</p> <ul style="list-style-type: none"> • If data gaps exist, the GSAs should note those and a preliminary timeline/schedule for filling those.