

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2022 - FEBRUARY 28, 2023
SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT
ACTIVITY AGREEMENTS BUDGET TO ACTUAL
NORTHERN DELTA-MENDOTA REGION (FUND 64)

Report Period 3/1/22 - 12/31/22
N/C Meeting 02/23/23

	Annual Budget	Total Revenues	Allocation by Participants							Budget Remaining	% of Amt Remaining	Expenses Through
			Patterson ID 10.3181%	West Stanislaus ID 13.7814%	Del Puerto WD 32.0271%	Oak Flat 2.7843%	City of Patterson 4.6628%	Merced County 1.8217%	Stanislaus County 34.6045%			
REVENUES												
Membership Dues	\$ 59,944	\$ 59,943	\$ 6,185	\$ 8,261	\$ 19,198	\$ 1,669	\$ 2,795	\$ 1,092	\$ 20,743			
Total Revenues	\$ 59,944	\$ 59,943	\$ 6,185	\$ 8,261	\$ 19,198	\$ 1,669	\$ 2,795	\$ 1,092	\$ 20,743			
EXPENDITURES												
<u>Legal:</u>												
Outside Counsel	\$ 25,000	\$ 33,009	\$ 3,406	\$ 4,549	\$ 10,572	\$ 1,091	\$ 1,539	\$ 601	\$ 11,423	\$ (8,009)	-32%	12/2/22
<u>Other Professional Services:</u>												
Contracts	\$ 617,840	\$ 69,776	\$ 7,200	\$ 9,616	\$ 22,347	\$ 2,306	\$ 3,253	\$ 1,271	\$ 24,146	\$ 548,064	89%	11/21/22
<u>Other:</u>												
Executive Director	\$ 397	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 397	100%	
General Counsel	\$ 5,829	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,829	100%	
Water Policy Director	\$ 3,244	\$ 1,231	\$ 127	\$ 170	\$ 394	\$ 41	\$ 57	\$ 22	\$ 426	\$ 2,013	62%	12/31/22
Water Resources Program Manager	\$ 74,480	\$ 32,748	\$ 3,379	\$ 4,513	\$ 10,488	\$ 1,082	\$ 1,527	\$ 597	\$ 11,332	\$ 41,732	56%	12/31/22
Accounting	\$ 4,051	\$ 419	\$ 43	\$ 58	\$ 134	\$ 14	\$ 20	\$ 8	\$ 145	\$ 3,632	90%	12/31/22
Hydrotech 3	\$ 35,380	\$ 378	\$ 39	\$ 52	\$ 121	\$ 12	\$ 18	\$ 7	\$ 131	\$ 35,002	99%	12/31/22
Los Banos Administrative Staff	\$ 750	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 750	100%	
License & Continuing Education	\$ 250	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 250	100%	
Conferences & Training	\$ 2,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500	100%	
Travel/Mileage	\$ 3,750	\$ 23	\$ 2	\$ 3	\$ 7	\$ 1	\$ 1	\$ 0	\$ 8	\$ 3,727	99%	
Group Meetings	\$ 500	\$ 200	\$ 21	\$ 28	\$ 64	\$ 7	\$ 9	\$ 4	\$ 69	\$ 300	60%	
Telephone	\$ 1,250	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,250	100%	
Equipment and Tools	\$ 1,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,500	100%	
Software	\$ 2,425	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,425	100%	
Total Expenditures	\$ 779,146	\$ 137,784	\$ 14,217	\$ 18,989	\$ 44,128	\$ 396	\$ 6,425	\$ 2,510	\$ 47,680	\$ 641,362	82%	
Fund 64 Excess/(Deficit) w/o Grant Reimbursement	\$ (719,202)	\$ (77,841)	\$ (8,032)	\$ (10,728)	\$ (24,930)	\$ 1,273	\$ (3,630)	\$ (1,418)	\$ (26,937)			
Grant Reimbursements												
Grant Reimbursements	\$ -	\$ 21,281	\$ 2,196	\$ 2,933	\$ 6,816	\$ 703	\$ 992	\$ 388	\$ 7,364			
Grant Retention	\$ -	\$ 1,977	\$ 204	\$ 272	\$ 633	\$ 65	\$ 92	\$ 36	\$ 684			
Total Grant Reimbursements	\$ -	\$ 23,258	\$ 2,400	\$ 3,205	\$ 7,449	\$ 769	\$ 1,084	\$ 424	\$ 8,048			
Fund 64 Excess/(Deficit) with Grant Reimbursement	\$ (719,202)	\$ (54,583)	\$ (5,632)	\$ (7,522)	\$ (17,481)	\$ 2,042	\$ (2,545)	\$ (994)	\$ (18,888)			

Subject to Rounding

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2022 - FEBRUARY 28, 2023
SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT
ACTIVITY AGREEMENTS BUDGET TO ACTUAL
CENTRAL DELTA-MENDOTA REGION (FUND 65)

Report Period 3/1/22 - 12/31/22
N/C Meeting 02/23/23

		Allocation by Participants																	
		Panoche	San Luis	Eagle Field	Fresno Slough	Mercy Springs	Oro Loma	Pacheco	Tranquillity	Fresno	Merced	Santa Nella	Widren						
		WD	WD	WD	WD	WD	WD	WD	WD	County	County	County	GSA						
		8.3333%	8.3333%	8.3333%	8.3333%	8.3333%	8.3333%	8.3333%	8.3333%	8.3333%	8.3333%	8.3333%	8.3333%						
Annual	Total													Budget	% of Amt	Expenses			
Budget	Revenues													Remaining	Remaining	Through			
REVENUES																			
Membership Dues	\$ 156,369	\$ 156,372	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031			
Total Revenues	\$ 156,369	\$ 156,372	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031	\$ 13,031			
EXPENDITURES																			
<u>Legal:</u>																			
Outside Counsel	\$ 25,000	\$ 42,323	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ 3,527	\$ (17,323)	-69%	10/5/22
<u>Other Professional Services:</u>																			
Contracts	\$ 617,840	\$ 68,431	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 5,703	\$ 549,409	89%	10/13/22
<u>Other:</u>																			
Executive Director	\$ 397	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 397	100%	
General Counsel	\$ 5,829	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,829	100%	
Water Policy Director	\$ 3,244	\$ 1,231	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 103	\$ 2,013	62%	11/30/22
Water Resources Program Manager	\$ 74,480	\$ 34,388	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 2,866	\$ 40,092	54%	11/30/22
Accounting	\$ 4,051	\$ 394	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 33	\$ 3,657	90%	9/30/22
Hydrotech 3	\$ 35,380	\$ 534	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 34,846	98%	
Los Banos Administrative Staff	\$ 750	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 750	100%	
License & Continuing Education	\$ 250	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 250	100%	
Conferences & Training	\$ 2,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500	100%	
Travel/Mileage	\$ 3,750	\$ 23	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 3,727	99%	
Group Meetings	\$ 500	\$ 200	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17	\$ 300	60%	
Telephone	\$ 1,250	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,250	100%	
Equipment and Tools	\$ 1,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,500	100%	
Software	\$ 2,425	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,425	100%	
Total Expenditures	\$ 779,146	\$ 147,524	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 12,294	\$ 631,622	81%	
Fund 65 Excess/(Deficit) w/o Grant Reimbursement	\$ (622,777)	\$ 8,848	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737	\$ 737			
Grant Reimbursements																			
Grant Reimbursements	\$ -	\$ 21,281	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773	\$ 1,773			
Grant Retention	\$ -	\$ 1,977	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165	\$ 165			
Total Revenues	\$ -	\$ 23,258	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938	\$ 1,938			
Fund 65 Excess/(Deficit) with Grant Reimbursement	\$ (622,777)	\$ 32,106	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676	\$ 2,676			

Subject to Rounding

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2022 - FEBRUARY 28, 2023
SGMA ACTIVITIES - COORDINATED COST-SHARE AGREEMENT
ACTIVITY AGREEMENTS BUDGET TO ACTUAL
COORDINATED (FUND 63)

Report Period 3/1/22 - 12/31/22

Coordination Meeting 2/13/23

EXPENDITURES	Annual Budget	Paid/ Expense	Amount Remaining	% of Amt Remaining	Expenses Through
<u>Legal:</u>					
Baker Manock & Jensen	\$ 10,000	\$ 33,382	\$ (23,382)	-234%	12/2/22
<u>Other Professional Services:</u>					
GSP Implementation Contracts					
Coordinated Annual Reports Activities (Common Chapter, Water Level Contouring)	\$ 50,579	\$ 10,865	\$ 39,714	79%	10/12/22
DMS Hosting, Augmentation and Support	\$ 10,306	\$ 3,458	\$ 6,848	66%	5/23/22
GSP Approval-DWR Response to Comments	\$ 10,000	\$ 52,569	\$ (42,569)	-426%	8/3/22
Staff Augmentation Support (EKI)	\$ 51,241	\$ 28,822	\$ 22,419	44%	11/21/22
Proposition 68 (Grant Administration)					
Component 1 (Grant Administration)	\$ 39,150	\$ 25,041	\$ 14,109	36%	8/3/22
Component 2 (Technical Assistance)	\$ 10,000	\$ -	\$ 10,000	100%	
Component 10 (Well Census and Inventory)	\$ 10,000	\$ -	\$ 10,000	100%	
Component 11 (Subsidence Characterization)	\$ 10,000	\$ -	\$ 10,000	100%	
SGMA Implementation Grant Round 1 SPA (A9)	\$ -	\$ 2,950	\$ (2,950)	0%	10/12/22
SGMA Implementation Grant Round 2 SPA (A10)	\$ -	\$ -	\$ -	0%	
<u>Other:</u>					
Executive Director	\$ 2,383	\$ -	\$ 2,383	100%	
General Counsel	\$ 4,210	\$ 217	\$ 3,993	95%	3/31/22
Water Policy Director	\$ 4,128	\$ 4,153	\$ (25)	-1%	12/31/22
Water Resources Program Manager	\$ 44,277	\$ 38,873	\$ 5,404	12%	12/31/22
Accounting	\$ 4,207	\$ 2,753	\$ 1,454	35%	12/31/22
License & Continuing Education	\$ 500	\$ -	\$ 500	100%	
Los Banos Administrative Office (LBAO)	\$ 500	\$ -	\$ 500	100%	
Conferences & Training	\$ 2,500	\$ -	\$ 2,500	100%	
Travel/Mileage	\$ 7,500	\$ -	\$ 7,500	100%	
Group Meetings	\$ 1,000	\$ 225	\$ 775	77%	
Telephone	\$ 2,500	\$ 61	\$ 2,439	98%	
Software	\$ 2,500	\$ -	\$ 2,500	100%	
Equipment and Tools	\$ 5,350	\$ -	\$ 5,350	100%	
Total Expenditures	\$ 282,831	\$ 203,369	\$ 79,462	28%	

	A	B	C
1	IRWM Proposition 1 Round 1		
2	Amount Paid		
3	Administration	\$ 9,000.00	
4	City of Huron	\$ 584,974.57	
5	NVRRWP-Turlock	\$ 45,000.00	
6	WSID Pumping Plant	\$ -	
7	Orestimba Creek	\$ 404,632.00	
8	Broadview Aquifer	\$ 218,683.66	
9	Total	\$ 1,262,290.23	
10			
11	Amount Remaining		
12	Administration	\$ 1,000.00	
13	City of Huron	\$ 25.43	
14	NVRRP-Turlock	\$ -	
15	WSID Pumping Plant	\$ 809,264.00	
16	Orestimba Creek	\$ 404,632.00	
17	Broadview Aquifer	\$ 67,316.34	
18	Total	\$ 1,282,237.77	
19			
20	Prop 1/Prop 68 SGMA Plan Development		
21	Amount Paid		
22	Administration	\$ 65,757.08	
23	Technical Assistance	\$ 841,686.85	
24	Generic DMS	\$ 178,500.00	
25	N-C Region GSP	\$ 534,291.00	
26	Grassland GSP	\$ 199,118.00	
27	Farmers GSP	\$ 166,802.00	
28	Aliso GSP	\$ 197,655.00	
29	Fresno GSP	\$ 249,171.00	
30	SJREC GSP	\$ 342,894.00	
31	Well Census	\$ 100,000.00	
32	Subsidence Study	\$ 91,681.50	
33	Total	\$ 2,967,556.43	
34			
35	Amount Remaining		
36	Administration	\$ 10,841.92	
37	Technical Assistance	\$ 158,313.15	
38	Generic DMS	\$ -	
39	N-C Regions GSP	\$ -	
40	Grassland GSP	\$ -	
41	Farmers GSP	\$ -	
42	Aliso GSP	\$ -	
43	Fresno GSP	\$ -	
44	SJREC GSP	\$ -	
45	Well Census	\$ -	
46	Subsidence Study	\$ 8,318.50	
47	Total	\$ 177,473.57	

DRAFT Joint Meeting of the Northern Delta-Mendota Region Management Committee,
Central Delta-Mendota Region Management Committee, and
Central Delta-Mendota GSA

Thursday, January 26, 2023, 10:00 AM

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

and

Del Puerto Water District, 17840 Ward Avenue, Patterson, CA

Management Committee and Central GSA Members and Alternates Present

Northern DM Region Management Committee

Anthea Hansen, Member – Del Puerto Water District

Central DM Region Management Committee

Amy Montgomery*, Member – Santa Nella County Water District

Danny Wade*, Member/Alternate – Fresno Slough Water District/Tranquillity Irrigation District

Randy Miles*, Member – Eagle Field Water District

Juan Cadena*, Alternate – Mercy Springs Water District

Wayne Western*, Member – Panoche Water District

Damian Aragona*, Member – Widren Water District

Augie Ramirez*, Alternate – Fresno County

*Indicates representative, alternate, or 2nd alternate of the Central Delta-Mendota GSA

San Luis & Delta-Mendota Water Authority Representatives Present

John Brodie

Ray Tarka

Others Present via Zoom

Maria Encinas, Member – City of Patterson

Chase Hurley*, Alternate – Pacheco Water District

Laurie Rouch*, Alternate – Santa Nella County Water District

Lauren Viers – SLDMWA

Leslie Dumas – Woodard & Curran

Anona Dutton – EKI Environment & Water, Inc.

Meredith Durant – EKI Environment & Water, Inc.

Lauren Layne – Baker Manock & Jensen (latter portion of meeting)

Joe Hopkins – Provost & Pritchard

1. Call to Order/Roll Call

Amy Montgomery/Santa Nella County Water District called the meeting to order at 10:07 AM.

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

No corrections or additions were made to the agenda of items.

3. **Opportunity for Public Comment**

No public comment was provided.

4. **Committees to Review and Take Action on Consent Calendar, Barcellos/Brodie**

- i. **Minutes for the December 14, 2022 Joint Meeting of the Northern and Central Delta-Mendota Region Management Committees and Central Delta-Mendota GSA**
- ii. **Budget-to-Actual Report (through November 2022)**
- iii. **Grant Reimbursement Summary Report**

A quorum was not present for the Northern Region Management Committee. Wayne Western/Panoche Water District provided the motion to approve the Consent Calendar for the Central Region Management Committee and Augie Ramirez/Fresno County seconded. The Central Region Management Committee voted by roll call; the motion was passed unanimously by those present.

5. **Approval of the Minutes for the November 14, 2022 Joint Meeting of the Northern and Central Delta-Mendota Region Management Committees and Central Delta-Mendota GSA (Northern Committee approval only), Brodie**

A quorum was not present for the Northern Region Management Committee. This item will be considered at a separate Special Meeting of the Northern Region Management Committee.

6. **Committees to Consider Approval of the FY 2024 Northern and Central Delta-Mendota Region Management Committees GSP Implementation Budgets (Funds 64 and 65), Brodie/Petersen**

John Brodie reviewed the GSP Implementation budgets included in the meeting materials. He noted that the Northern & Central Region member agencies will not be assessed dues for Funds 64 and 65 during FY 2024.

A quorum was not present for the Northern Region Management Committee. Augie Ramirez provided the motion to approve the FY 2024 GSP Implementation Budget for the Central Region Management Committee and Danny Wade/Tranquillity Irrigation District seconded. The Central Management Committee voted by roll call; the motion was passed unanimously by those present.

7. **Committees to Consider Directing Northern and Central Delta-Mendota Representatives to the Coordination Committee to Approve the FY 2024 Coordinated GSP Implementation Budget (Fund 63), Brodie/Petersen**

John Brodie reviewed past activities regarding this topic, noting that the draft Fund 63 GSP Implementation budget was discussed during Subbasin Coordination Committee meetings in January 2023, with approval of the FY 2024 Coordinated Budget scheduled as an agenda item for the Subbasin Coordination Committee meeting on February 13, 2023. Joe Hopkins reported that an ad hoc committee met to review the FY 2024 Coordinated budget in more detail. SLDMWA anticipates transmittal of invoices for Fund 63 to the member agencies in March and August.

A quorum was not present for the Northern Region Management Committee. Randy Miles/Eagle Field Water District provided the motion for the Central Region Management Committee to direct its representative on the Coordination Committee to approve the FY 2024 Coordinated Budget and Wayne Western seconded. The Central Region Management Committee voted by roll call; the motion was passed unanimously by those present.

8. Committees to Consider Directing Northern and Central Delta-Mendota Representatives to the Coordination Committee to Approve Luhdorff & Scalmanini to Complete Task 1 of Component 8 of the SGMA Round 1 Grant, Brodie

John noted the proposal from Luhdorff & Scalmanini (LSCE) regarding siting of interconnected surface water monitoring wells was prepared in response to a request from the Coordination Committee. The LSCE proposal is included in the meeting materials. The proposed LSCE budget represents a small percentage of the budget allocated for Component 8 of the SGMA Round 1 Grant.

A quorum was not present for the Northern Region Management Committee. Augie Ramirez provided the motion for the Central Region Management Committee to direct its representative on the Coordination Committee to approve the LSCE proposal and Danny Wade/Tranquillity Irrigation District seconded. The Central Management Committee voted by roll call; the motion was passed unanimously by those present.

9. GSP Group Representatives Report from Subbasin Coordination Committee Meetings on January 3, 5, and 9, 2023, Hurley/Brodie

- a) Proposed additional ISW monitoring locations in SGMA Round 1 grant
- b) Revision of Subbasin Coordination Agreement

John Brodie reported that the multi-layer compaction well included in the SGMA Round 1 grant application is more expensive than anticipated during the application preparation. He intends to solicit approval from DWR to revise this component to replace the well with several continuous GPS units. Several locations were discussed, but input from the Northern Region Management Committee will be requested on this topic.

John Brodie reported that through its TSS program, DWR may install -20 subsidence monitoring stations throughout California. The locations are not yet determined, and the monitoring stations will not be in place until 2026.

Joe Hopkins noted that the Subbasin Coordination Agreement was prepared several years ago during development of the GSPs, and it needs to be revised and updated for purposes of GSP implementation. The Agreement does not address topics such as potential exceedances of sustainable management criteria, a GSP region's potential lack of commitment, and possible addition of standing subcommittees. The current intention is to develop a layperson's agreement on the topics, and then to involve attorneys in crafting a formal revision of the Coordination Agreement.

10. Committees to Discuss Work Plan and Schedule for Preparation of 2025 GSP Update, Brodie

The updated and revised Subbasin Coordination Agreement will be submitted with the 2025 GSP Update. John Brodie reported that DWR has not issued any Notices of Determination regarding the Amended GSPs that were submitted in the summer of 2022. DWR now expects to release these Notices within a span of a few days, in late March 2023.

John Brodie reported that revision of the Common Chapter is in progress. He hopes to have a draft revision available for discussion at the Coordination Committee meeting on February 13, 2023. The objective is to simplify the text, so that it is more understandable to the general public.

The schedule for preparing the 2025 GSP Update is included in the meeting materials.

11. **Committees to Discuss Next Reimbursement Request for SGMA Round 1 Activities, Dumas**

Leslie Dumas reported that the first reimbursement request was submitted to DWR, and DWR had some questions. Woodard & Curran is now preparing the second reimbursement request. Participating GSAs and member agencies should submit their reimbursement documentation to Kelsey at Woodard & Curran by January 31, 2023 for compilation and transmittal to DWR by February 28, 2023. Going forward, the schedule will be for the participating agencies to submit their reimbursement documentation to Woodard & Curran by the final day of the first month following the end of the calendar quarter, with the compiled reimbursement request submitted to DWR by the last day of the second month following the end of the calendar quarter.

12. **Committees to Discuss 2022 GSP Implementation**

- a) **2022 GSP Implementation Activities Review, Dutton**
- b) **Three-Month Look-Ahead Schedule, Dutton**
- c) **WY 2022 Annual Report, Dumas/Dutton**
- d) **Stakeholder Outreach and Engagement, Dumas/Dutton**

Anona Dutton/EKI discussed the FY 2023 GSP Implementation Review and FY 2024 Look-Ahead included in the meeting materials. She also reviewed the three-month look-ahead schedule and the GSP Implementation Commitment summary tables intended to assist the GSAs in keeping on track with the commitments included in the original and Amended GSP, as well as with implementation of the individual projects and collective management actions. Leslie Dumas reported that preparation of the WY 2022 Annual Report is in progress. She reminded the GSAs to submit their updated information on water levels and groundwater extraction data. Leslie also reminded the GSAs to document their stakeholder outreach activities, for potential inclusion in the Annual Report.

13. **Committees to Discuss Potential Additional Funding Opportunities, Brodie**

John Brodie noted the additional grant funding opportunities included in the meeting materials.

14. **Next Steps**

The following next steps were identified during the meeting:

- John Brodie will transmit a Doodle poll to reschedule the March 2023 meeting of the Northern & Central Delta-Mendota Management Committees.
- John Brodie will attempt to schedule a Special Meeting of the Northern Region Delta-Mendota Management Committee prior to the Subbasin Coordination Committee on February 13, 2023.
- Members of the Northern Region Management Committee will be consulted regarding preferred locations for a continuous subsidence monitoring station.

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

No topics were discussed under this item.

16. **Future Meetings**

- a. Northern & Central Regions Management Committees
 - i. Thursday February 23, 2023 at 10:00 AM
 - ii. Thursday March 23, 2023 at 10:00 AM (Will be rescheduled)
 - iii. Thursday April 27, 2023 at 10:00 AM
- b. Delta-Mendota Subbasin Coordination Committee
 - i. Monday February 13, 2023 at 9:30 AM

17. **Conference with Legal Counsel – Existing Litigation**

At this time, a closed session with legal counsel was not necessary.

18. **Report Out of Closed Session**

A closed session was not conducted as part of this meeting.

19. **ADJOURNMENT**

Amy Montgomery adjourned the meeting at 10:54 AM.

DRAFT Special Meeting of the Northern Delta-Mendota Region Management Committee

Thursday, February 2, 2023, 1:00 PM

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

and

Del Puerto Water District, 17840 Ward Avenue, Patterson, CA

and

Patterson Irrigation District, 948 Orange Avenue, Patterson, CA

Northern DM Region Management Committee Members and Alternates Present

Anthea Hansen, Member – Del Puerto Water District
Adam Scheuber, Alternate – Del Puerto Water District
Vince Lucchesi, Member – Patterson Irrigation District
Maria Encinas, Member – City of Patterson
Bobby Pierce, Member – West Stanislaus Irrigation District
Lacey McBride, Member – Merced County
Christy McKinnon, Member – Stanislaus County

San Luis & Delta-Mendota Water Authority Representatives Present

John Brodie

Others Present via Zoom

Ray Tarka – San Luis & Delta-Mendota Water Authority
Anona Dutton – EKI Environment & Water, Inc. (latter part of meeting)
Meredith Durant – EKI Environment & Water, Inc.

1. Call to Order/Roll Call

Vince Lucchesi/Patterson Irrigation District called the meeting to order at 1:03 PM.

2. Opportunity for Public Comment

No public comment was provided.

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

- i. Minutes for the November 14, 2022 Joint Meeting of the Northern and Central Delta-Mendota Region Management Committees and Central Delta-Mendota GSA
- ii. Minutes for the December 14, 2022 Joint Meeting of the Northern and Central Delta-Mendota Region Management Committees and Central Delta-Mendota GSA
- iii. Budget-to-Actual Report (through November 2022)
- iv. Grant Reimbursement Summary Report

Christy McKinnon/Stanislaus County provided the motion to approve the Consent Calendar and Maria Encinas/City of Patterson seconded. The Northern Region Management Committee voted by roll call; the motion was passed unanimously by those present.

4. Committee to Consider Approval of the FY 2024 Northern Delta-Mendota Region Management Committee GSP Implementation Budgets (Fund 64), Brodie

John Brodie reviewed the GSP Implementation budgets included in the meeting materials and noted that the SLDWMA Board approved the budgets the previous week. He noted that the Northern Region member agencies will not be assessed dues for Fund 64 during FY 2024. The Committee discussed whether the Fund 64 budget should be increased by \$100K to add to the reserve fund for preparation of the 5-Year GSP Update.

Anthea Hansen/Del Puerto Water District provided the motion to approve the FY 2024 Fund 64 GSP Implementation Budget, as amended to add \$100K for the reserve fund and require an open bid process for a consultant to perform update tasks, and Bobby Pierce/West Stanislaus Irrigation District seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present.

5. Committee to Consider Directing Northern Delta-Mendota Representative to the Coordination Committee to Approve the FY 2024 Coordinated GSP Implementation Budget (Fund 63), Brodie

John Brodie reviewed past activities regarding this topic, noting that the draft Fund 63 GSP Implementation budget was discussed during Subbasin Coordination Committee meetings in January 2023, with approval of the FY 2024 Coordinated Budget scheduled as an agenda item for the Subbasin Coordination Committee meeting on February 13, 2023. Fund 63 currently has a negative balance, which is being carried by SLDMWA, pending collection of participant dues.

Christy McKinnon provided the motion for the Northern Region Management Committee to direct its representative on the Coordination Committee to approve the FY 2024 Coordinated GSP Implementation Budget and Maria Encinas seconded. The Northern Region Management Committee voted by roll call; the motion was passed unanimously by those present.

6. Committee to Consider Directing Northern Delta-Mendota Representative to the Coordination Committee to Approve Luhdorff & Scalmanini to Complete Task 1 of Component 8 of the SGMA Round 1 Grant, Brodie

John noted the proposal from Luhdorff & Scalmanini (LSCE) regarding siting of interconnected surface water monitoring wells was prepared in response to a request from the Coordination Committee. The LSCE proposal is included in the meeting materials. The proposed LSCE budget represents a small percentage of the budget allocated for Component 8 of the SGMA Round 1 Implementation Grant. John noted that it is not clear whether DWR will allow sole source procurement for grant-funded activities. However, LSCE has specific knowledge on this topic, and there is urgency to initiate this well siting/design task due to the long lead time for scheduling well drillers.

Maria Encinas provided the motion for the Northern Region Management Committee to direct its representative on the Coordination Committee to approve the LSCE proposal and Christy McKinnon seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present.

7. Future Meetings

John called the attention of Committee members to the need to reschedule the March meeting and noted the existence of a doodle poll to schedule the meeting for earlier that week in March.

He requested Committee members fill out the poll if they have not already done so, and offered to forward the doodle poll link to all members who needed it again.

8. **ADJOURNMENT**

Vince Lucchesi adjourned the meeting at 1:41 PM.

DRAFT



MEMORANDUM

TO: Northern and Central Delta-Mendota Region Management Committees
Members and Alternates

FROM: John Brodie, Water Resources Program Manager

DATE: February 22, 2023

RE: Approval of Design Expenses for SGMA Round 1 Grant Monitoring Networks
(Component 8, Task 7)

BACKGROUND

On October 11, 2022, the Del Puerto Water District (DPWD) signed a grant agreement with the California Department of Water Resources (DWR) to fund SGMA Implementation activities in the Delta-Mendota Subbasin. The grant agreement contains a total of 11 Components to be completed. Component 8 proposes to fill data and monitoring gaps identified by the Subbasin. Total funding allocated in the grant for a non-specific Interconnected Surface Water Monitoring Network (ISWMN) and a non-specific Subsidence Monitoring Network (SMN) is \$640,000.

ISSUES FOR DECISION

The Coordination Committee, at its meeting on March 21, 2023 will consider whether to issue a Request for Proposals (RFP) for installing a continuous GPS (CGPS) monitoring site(s) in an area(s) identified by the Committee. The Northern and Central Management Committees must decide whether to direct representatives to the Coordination Committee to approve sending the RFP to a list of consultants to prepare an estimate for a CGPS monitoring site(s) in the Subbasin to meet the requirements for the grant. A competitive bidding process is required by the terms of the grant agreement. Due to the technical nature of the work, the Committee is permitted to consider technical expertise and is not required to accept a low bid.

RECOMMENDATION

Staff recommends the following:

That the Northern and Central Delta-Mendota Region Management Committees authorize their representatives to support the issuance of an RFP for design, siting, and cost estimates for a subsidence monitoring network as described in the grant proposal.

ANALYSIS

Cost will be factor in determining the number of CGPS sites that can be installed to fill subsidence monitoring gaps in the Delta-Mendota Subbasin. The more CGPS units that can be installed, the longer it will take to complete this task.

BUDGET

As previously noted, the total amount of funding available for Subbasin-wide benefit under this component is \$640,000. Those funds will be split between an Interconnected Surface Water Monitoring Network and a Subsidence Monitoring Network.



MEMORANDUM

TO: Northern Delta-Mendota Region Management Committee Members and Alternates

FROM: John Brodie, Water Resources Program Manager

DATE: February 23, 2023

RE: Reconsideration of Amended Budget Proposal for Fund 64 (Northern Delta-Mendota Region Management Committee).

BACKGROUND

At the February 2, 2023 Special Meeting of the Northern Region Management Committee, members voted to approve an amended budget for an additional \$100,000 to support work for the 2025 Groundwater Sustainability Plan Update (Update).

ISSUES FOR DECISION

Members expressed concern that they didn't see a specific line item to include the funds for the Update. Members wanted to be sure funds were being set aside so the Update will be completed without the need for significant extra dues collections after the work was completed. However, the line item for the Update funds was included in the budget's contract line. The Northern Region Management Committee must decide whether to approve the budget as originally presented with \$100,000 already included for Update costs, or accept the amended budget approved at the February 2, 2023 meeting with \$200,000 now set aside for Update costs.

RECOMMENDATION

Staff recommends the following:

That the Northern Region Management Committees approve the original budget submitted and included in this meeting packet with \$100,000 set aside for Update costs. That budget has already been approved by the San Luis & Delta-Mendota Water Authority Board.

ANALYSIS

If they deem it necessary, the Committee may add an extra \$100,000 to the Update budget.

BUDGET

Adding the extra \$100,000 to the Update budget may result in a dues collection for this fiscal year rather than having a credit as previously anticipated.

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2023 - FEBRUARY 28, 2024
SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT
NORTHERN DELTA-MENDOTA REGION (FUND 64)

FY23 Projections & FY24 Budget Draft WRC & FAC 12/5/22	FY23 Budget 3/1/22 - 2/28/23	FY23 Projected Actual @ 2/28/23	FY24 Budget 3/1/23 - 2/28/24
EXPENDITURES			
Legal:			
Baker Manock & Jensen	\$ 25,000	\$ 43,000	\$ 25,000
Other Professional Services:			
Contracts	\$ 617,840	\$ 400,000	\$ 419,830
Other:			
Executive Director	\$ 397	\$ -	\$ 394
General Counsel	\$ 5,829	\$ 1,500	\$ 5,652
Water Policy Director	\$ 3,244	\$ 2,000	\$ 8,236
Water Resources Program Manager	\$ 74,480	\$ 50,000	\$ 70,200
Accounting	\$ 4,051	\$ 902	\$ 2,808
Hydrotech 3	\$ 35,380	\$ 20,638	\$ 23,712
Los Banos Administrative Office (LBAO)	\$ 750	\$ 750	\$ -
License & Continuing Education	\$ 250	\$ -	\$ 250
Conferences & Training	\$ 2,500	\$ 1,000	\$ 1,250
Travel/Mileage	\$ 3,750	\$ 1,000	\$ 2,500
Group Meetings	\$ 500	\$ 343	\$ 500
Telephone	\$ 1,250	\$ 1,250	\$ 1,250
Equipment and Tools	\$ 1,500	\$ 500	\$ 2,825
Software	\$ 2,425	\$ -	\$ 250
Total Expenditures	\$ 779,145	\$ 522,884	\$ 564,657
REVENUES			
Fund Balance	\$ 719,201	\$ 1,343,558	\$ 639,381
Other Revenues	\$ -	\$ 58,764	\$ -
Membership Dues	\$ 59,944	\$ 59,943	\$ (74,724)
Total Revenues	\$ 779,145	\$ 1,462,265	\$ 564,657

FUND BALANCE:			
End of FY 22 (Budget Estimated)	\$ 719,201		
End of FY 22 (Unaudited)		\$ 1,343,558	
End of FY 23 (Budget Estimated)	\$ -		
End of FY 23 (Estimated)			\$ 939,381
Reserved for 5 year update on GSP			\$ 300,000
End of FY 24 (Estimated)			\$ -
		Available/(Required)	\$ 639,381

PRIOR YEAR:	FY21	FY22	FY23	FY24
BUDGET	\$ 832,572	\$ 649,812	\$ 779,145	\$ 564,657
MEMBERSHIP DUES	\$ 832,572	\$ 649,812	\$ 59,944	\$ (74,724)

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
MARCH 1, 2022 - FEBRUARY 28, 2023
SUSTAINABLE GROUNDWATER MANAGEMENT ACT SERVICES AGREEMENT
NORTHERN DELTA-MENDOTA REGION COST ALLOCATION

FY23 Projections & FY24 Budget Draft
 Report Period 3/1/22 - 9/30/22

	GSA Acreage to Allocate Costs	% of Northern Region Acreage	TOTAL SGMA	Other Professional Services	Equal Split between # of GSAs 5	Authority & Legal
			\$ (74,724)			
DIVISION 1						
1. Banta-Carbona ID		0.00000%	\$ -	\$ -	0.00000%	\$ -
2. City of Tracy		0.00000%	\$ -	\$ -	0.00000%	\$ -
3. Del Puerto Water District (DPWD 52,570 ac + Oak Flat 4,503 ac)	57,073	35.61387%	\$ (24,045)	\$ (20,758)	20.00000%	\$ (3,288)
3A. Del Puerto (92% of DPWD GSA Cost)			\$ (8,277)			
3B. Oak Flat (8% of DPWD GSA Cost)			\$ (720)			
4. Patterson Irrigation District (PID 13,067 ac + Twin Oaks 2,629 ac)	15,696	9.79439%	\$ (8,997)	\$ (5,709)	20.00000%	\$ (3,288)
5. Byron Bethany Irrigation District (2020 absorbed West Side ID)		0.00000%	\$ -	\$ -		\$ -
6. West Side Irrigation District		0.00000%	\$ -	\$ -	0.00000%	\$ -
7. West Stanislaus ID (WSID 21,299 ac + Grayson/Westley 246 ac)	21,545	13.44420%	\$ (11,124)	\$ (7,836)	20.00000%	\$ (3,288)
Total Division 1	94,314	58.8525%	\$ (44,166)	\$ (34,302)	60.00000%	\$ (9,864)
DIVISION 2						
1. Panoche Water District		0.00000%	\$ -	\$ -		\$ -
2. San Luis Water District		0.00000%	\$ -	\$ -		\$ -
3. Westlands Water District (1)		0.00000%	\$ -	\$ -		\$ -
4. Charleston Drainage District		0.00000%	\$ -	\$ -	0.00000%	\$ -
5. Panoche Drainage District		0.00000%	\$ -	\$ -	0.00000%	\$ -
6. Pleasant Valley		0.00000%	\$ -	\$ -	0.00000%	\$ -
Total Division 2	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
DIVISION 3						
1. Central California Irrigation District**		0.00000%	\$ -	\$ -	0.00000%	\$ -
2. Firebaugh Canal Water District**		0.00000%	\$ -	\$ -	0.00000%	\$ -
3. Grassland Water District		0.00000%	\$ -	\$ -	0.00000%	\$ -
4. HMRD #2131**		0.00000%	\$ -	\$ -	0.00000%	\$ -
5. Columbia Canal Company (Friend Member)**		0.00000%	\$ -	\$ -	0.00000%	\$ -
6. Camp 13 Drainers		0.00000%	\$ -	\$ -	0.00000%	\$ -
Total Division 3	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
DIVISION 4						
1. San Benito County Water District			\$ -	\$ -	0.00000%	\$ -
2. Valley Water District (2)			\$ -	\$ -	0.00000%	\$ -
Total Division 4	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
DIVISION 5						
1. Broadview Water District		0.00000%	\$ -	\$ -		\$ -
2. Eagle Field Water District	0	0.00000%	\$ -	\$ -		\$ -
3. Fresno Slough WD** -withdrew 8/31/11	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
4. James Irrigation District**		0.00000%	\$ -	\$ -	0.00000%	\$ -
5. Laguna Water District		0.00000%	\$ -	\$ -		\$ -
6. Mercy Springs Water District	0	0.00000%	\$ -	\$ -		\$ -
7. Oro Loma Water District	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
8. Pacheco Water District	0	0.00000%	\$ -	\$ -		\$ -
9. Reclamation District 1606**		0.00000%	\$ -	\$ -	0.00000%	\$ -
10. Tranquillity ID** -withdrew 8/31/11	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
11. Turner Island Water District	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
Total Division 5	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
OTHER						
1. Northwestern Delta Mendota Subbasin GSA (Stan. Cty 56,766 ac + Merced Cty 3,035 ac)	59,801	37.31615%	\$ (25,038)	\$ (21,750)	20.00000%	\$ (3,288)
1a. Merced County (5% of Northwestern DM GSA Cost)			\$ (276)			
1b. Stanislaus County (95% of Northwestern DM GSA Cost)			\$ (5,245)			
2. City of Patterson GSA	6,140	3.83139%	\$ (5,521)	\$ (2,233)	20.00000%	\$ (3,288)
3. Fresno County	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
4. Merced County	0	0.00000%	\$ -	\$ -	0.00000%	\$ -
5. Santa Nella County Water District	0	0.00000%	\$ -	\$ -		\$ -
6. Widren GSA	0	0.00000%	\$ -	\$ -		\$ -
Total Other	65,941	41.14755%	\$ (30,559)	\$ (23,983)	40.00000%	\$ (6,576)
	160,255	100.00%	\$ (74,724)	\$ (58,285)	100.00%	\$ (16,439)

Timeline: 2025 Plan Update for Northern and Central GSA

- December 14, 2022: Finalize recommended changes to draft 2025 Update timeline. Initiate task/subtask discussions/assignments for individual GSAs and consultants. Request input on changes to the Coordination Agreement.
- December 14, 2022: Review preliminary budgets for funds 64 and 65. Review of items needed for Annual Report.
- January 26, 2023: Review statutory requirements for the 2025 Plan updates and DWR's latest Plan update recommendations. Staff submits draft of example "simplified language" (from Common Chapter) for possible adjustments to 2025 Plan update. Begin discussions on how to address public comments received on GSP and revisions in the 2025 Plan Updates. Review of any released DWR GSP Determinations on other Subbasins for possible relevance to D-M Subbasin.
- February 23, 2023: Review of any released DWR GSP Determinations on other Subbasins for possible relevance to D-M Subbasin. Begin review of Annual Report Data for the 2025 Plan Updates.
- March 23, 2023 Conduct expedited review of DWR comments and recommended actions on revised GSPs and Common Chapter.
- April 27, 2023: Finalize review of DWR comments and recommended actions and incorporate into 2025 GSP update workplan. Finalize workplan including specific assignments for individual GSAs, GSP groups, and consultant tasks. Draft RFP for selecting Plan Update consultant. Schedule meeting with DWR to discuss Plan Update process and procedures.
- May 1, 2023: Issue RFP for Northern & Central Delta-Mendota Subbasin GSP 2025 Update. Staff/GSA/group analysis of "Basin" and "Setting" Chapters and DWR recommended actions. Further review of staff "simplified" text approach. Solicit feedback from DWR on simplified approach.
- May 31, 2023: Deadline for 2025 Update RFP Responses from Consultants. Continue discussions on Coordination Agreement revisions.
- June 1-15 2023: Subcommittee meets to select consultant(s) to interview for 2025 NCDMS Plan Update. Interview consultant(s) for 2025 NCDM GSP Update.

- June 22, 2023: Select consultant to perform specific tasks for 2025 NCDM GSP Update. Execute Fiscal Year task order. Consultant performs analysis of (any) DWR Plan Update guidance documents, recommended actions, and task/subtask lists and assignments including responses to comments. If needed, schedule meeting with DWR staff to discuss Plan Update items. Begin outline of responses to “general comments.” Begin review and discussions of Subbasin Water Budget and Sustainable Yield with Coordination Committee/TWG. Review of staff “simplified language” proposed changes. Review GSA/GSP group, staff, and consultant task list and timelines.
- July 27, 2023: Continue Water Budget and Sustainable Yield discussions with CC/TWG. Address DWR recommended actions. Finalize WQ section if able and begin discussions on CC Interconnected Surface Water SMC and Table. Meet with DWR to discuss Update progress and proposed changes.
- August 24, 2023: Finish water budget and sustainable yield with CC/TWG and incorporate into NCDM GSP. Incorporate WQ SMC and Table (if not already done) and/or Interconnected Surface Water SMC and table (see above). If able, begin discussions on Chronic Lowering of Groundwater. Address DWR recommended actions.
- September 28, 2023: Finalize Interconnected Surface Water SMC and Table (if not already done) and/or Chronic Lowering of Groundwater SMC and Table. Review tasks lists for GSAs, GSP groups, staff, and consultants for schedule. Review and identify any new priorities for next fiscal year’s budget. Address DWR recommended actions. Meet with DWR to discuss Update progress and proposed changes. Review GSA/GSP group, staff, and consultant task list and timelines.
- October 26, 2023: Finalize Chronic Lowering of groundwater SMC and table. Begin discussions of Reduction in Groundwater Storage SMC and Table. Continue review of budget. Address DWR recommended actions. Review items needed for Annual Report.
- November 30, 2023: Continue discussions of Reduction in Storage SMC and Table. Approve next fiscal year’s budget. Continue to review simplified language efforts. Address DWR recommended actions (if needed). Meet with DWR to discuss Update progress and changes.
- December 14, 2023: Finalize Reduction in Storage SMC and Table. Begin discussions of SMC and Table for Subsidence. Address DWR recommended actions (if needed). Review staff edits for simplified language. Review GSA/GSP group, staff, and consultant task list and timelines.
- January 25, 2024: Continue discussions of SMC and Table for Subsidence.

February 22, 2024:	Finalize SMC and Table for Subsidence. Address DWR recommended actions (if needed). Meet with DWR to discuss Update progress and changes.
March 28, 2024:	Begin planning public meetings on 2025 update. Finalize action on DWR recommended actions (if needed). Create draft presentation on Update changes. Meet with DWR to discuss Update progress and changes.
April 25, 2024:	Buffer month for tying up loose ends. Possibly begin public meeting roadshow. Review simplified language changes and refine draft presentation. Review GSA/GSP group, staff, and consultant task list and timelines.
May 22, 2024:	Begin holding public meetings on 2025 GSP update in Cooperation with the Coordination Committee. Note attendance and comments. Final review of GSA/GSP group task assignments and completion.
June 27, 2024:	Continue public meetings. Finalize draft Coordination Agreement revisions. Continue GSP simplified language revisions. Meet with DWR to discuss Update progress and changes.
July 25, 2024:	Continue Public Meetings. Continue individual GSP revisions. Coordination agreement out for GSA/GSP approval.
August 22, 2024:	Deadline for final review of CC, GSPs, and response to comments. Continue public meetings.
September 26, 2024:	Final approval of GSP 2025 Update.
October 1, 2024:	Begin public notices, public hearings, and formal approval at GSA level for final 2025 Common Chapter and individual GSP updates.
January 23, 2025:	Submit 2025 GSP Updates including Common Chapter, other appendices, and Coordination Agreement.

GSP Revision Direction
10/5/22

Phone conversation with John Brodie and Amanda Derby with DWR on 2025 update requirements.

Possible expectations:

- Information from the annual report(s) should be incorporated into the Update. The update should reflect actual data submitted.
- Show changes to the representative monitoring network.
- Everything in the Update should reflect from the Annual Reports.
- The Update should be a synopsis of relevant information. Attach new studies as references.

Water Budget update should be based on the current year. If you use models, update those. Make sure the new numbers make it into the Basin and Setting descriptions.

Give a thorough update on implementation, including both projects and management actions.

SMCs (Again, be sure to use submitted data from Annual Reports)

- Are we meeting five-year interim milestones?
- Are there any exceedances or undesirable results? If so, re-examine the SMCs. Consult with DWR if you don't intend to make changes if you do have exceedances.

Address any recommended corrective actions received from DWR in GSP approval process.

Tell a full story with complete transparency on how you're meeting SGMA goals and interim milestones. Explain why you are. If you aren't, explain why and what you're going to do about it.

Reach out to DWR for meetings with staff in the same way we did while developing the GSP revisions.

Address comments received on the GSPs within the text of the GSP *if* you make any changes in response to the comments received. Or you may include as an attachment if there are many. Look to see what Santa Cruz did with theirs.

It is due five years from submission of the original. If the GSP revision gets approved, there should be a due date for the Update in the letter that accompanies the approval.

Show the best and latest information. The annual report should be the focus of the updates.

There is a specific section on the five-year update in the legislation. Be sure to address all requirements in the regulation. Go through it and contact DWR if we have any follow-up questions.

[Home Table of Contents](#)

§ 356.4. Periodic Evaluation by Agency.

23 CA ADC § 356.4

Barclays Official California Code of Regulations

Barclays California Code of Regulations

Title 23. Waters

Division 2. Department of Water Resources

Chapter 1.5. Groundwater Management

Subchapter 2. Groundwater Sustainability Plans

Article 7. Annual Reports and Periodic Evaluations by the Agency

23 CCR § 356.4

§ 356.4. Periodic Evaluation by Agency.

Currentness

Each Agency shall evaluate its Plan at least every five years and whenever the Plan is amended, and provide a written assessment to the Department. The assessment shall describe whether the Plan implementation, including implementation of projects and management actions, are meeting the sustainability goal in the basin, and shall include the following:

- (a) A description of current groundwater conditions for each applicable sustainability indicator relative to measurable objectives, interim milestones and minimum thresholds.
- (b) A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions.
- (c) Elements of the Plan, including the basin setting, management areas, or the identification of undesirable results and the setting of minimum thresholds and measurable objectives, shall be reconsidered and revisions proposed, if necessary.
- (d) An evaluation of the basin setting in light of significant new information or changes in water use, and an explanation of any significant changes. If the Agency's evaluation shows that the basin is experiencing overdraft conditions, the Agency shall include an assessment of measures to mitigate that overdraft.
- (e) A description of the monitoring network within the basin, including whether data gaps exist, or any areas within the basin are represented by data that does not satisfy the requirements of Sections 352.4 and 354.34(c). The description shall include the following:
 - (1) An assessment of monitoring network function with an analysis of data collected to date, identification of data gaps, and the actions necessary to improve the monitoring network, consistent with the requirements of Section 354.38.
 - (2) If the Agency identifies data gaps, the Plan shall describe a program for the acquisition of additional data sources, including an estimate of the timing of that acquisition, and for incorporation of newly obtained information into the Plan.
 - (3) The Plan shall prioritize the installation of new data collection facilities and analysis of new data based on the needs of the basin.
- (f) A description of significant new information that has been made available since Plan adoption or amendment, or the last five-year assessment. The description shall also include whether new information warrants changes to any aspect of the Plan, including the evaluation of the basin setting, measurable objectives, minimum thresholds, or the criteria defining undesirable results.
- (g) A description of relevant actions taken by the Agency, including a summary of regulations or ordinances related to the Plan.
- (h) Information describing any enforcement or legal actions taken by the Agency in furtherance of the sustainability goal for the basin.
- (i) A description of completed or proposed Plan amendments.
- (j) Where appropriate, a summary of coordination that occurred between multiple Agencies in a single basin, Agencies in hydrologically connected basins, and land use agencies.

(k) Other information the Agency deems appropriate, along with any information required by the Department to conduct a periodic review as required by Water Code Section 10733.

Credits

NOTE: Authority cited: Section 10733.2, Water Code. Reference: Sections 10727.2, 10728, 10728.2, 10733.2 and 10733.8, Water Code.

HISTORY

1. New section filed 8-15-2016 as an emergency exempt from review by OAL pursuant to Water Code section 10733.2(d); operative 8-15-2016. Pursuant to Water Code section 10733.2(d), these regulations shall remain in effect until revised by the Department of Water Resources (Register 2016, No. 34).

This database is current through 9/23/22 Register 2022, No. 38.

Cal. Admin. Code tit. 23, § 356.4, 23 CA ADC § 356.4

END OF DOCUMENT

Comparison of Comment Letters on Delta-Mendota Subbasin GSP

Comment Letters	NCDM	Aliso	Farmers	Fresno	Grassland	SJREC
CDFW	X	X	X	X		X
NOAA Fisheries	X	X	X	X	X	X
Audubon California	X			X		
The Nature Conservancy	X			X	X	X
Bureau of Reclamation, SJRRP	X	X	X	X	X	X
CA Poultry Federation	X					
American Rivers	X					
The Nature Conservancy, Audubon California, Clean Water Action, Clean Water Fund, American Rivers, Union of Concerned Scientist and the Local Government Commission	X			X	X	
Central Valley Flood Protection Board	X	X	X	X	X	X
CA Sportsfishing Protection Alliance	X	X	X	X	X	X
Kirstin Dobbin, UC Davis	X	X	X	X	X	X
CA DWR Div of Flood Mgt	X					
DWR SWP CA Aqueduct Subsidence Program	X					

**Summary of Northern & Central Delta-Mendota Region GSP Comment Letter Topics
DWR Public Comment Period**

Comment Letter/ Common Topics	Beneficial uses and users	Interconnected surface water	Groundwater dependent ecosystems (GDEs)	Projects and management actions	Monitoring network/data gaps	Water budget	Sustainable management criteria (SMC)	Subsidence	Water quality	Sustainability goal	Stakeholder involvement	Best available science	Flood management	Public trust doctrine	Sustainable yield	Human Right to Drinking Water
California Department of Fish & Wildlife	X	X	X		X		X	X	X					X		
NOAA National Marine Fisheries Service		X	X		X	X	X			X						
Audubon California	X	X			X	X						X				
The Nature Conservancy	X	X	X		X	X	X									
US Bureau of Reclamation - Mid-Pacific Region, SJRRP	X	X	X			X	X									
CA Poultry Federation				X							X					
American Rivers		X		X					X							
The Nature Conservancy, Audobon California, Clean Water Action, Clean Water Fund, American Rivers, Union of Concerned Scientists and the Local Government Commission	X		X	X	X	X					X					
Central Valley Flood Protection Board				X				X					X			
CA Sportfishing Protection Alliance	X	X	X	X	X	X	X			X		X		X	X	
Kristin Dobbins, UC Davis				X					X	X	X					X
CA DWR Div of Flood Mgmt				X			X	X					X			
DWR SWP CA Aqueduct Subsidence Program					X		X	X								

Table 1: Categorized Public Comments Received on Groundwater Sustainability Plan for the Northern and Central Delta-Mendota Regions

Topic	Comment ID (#)	Date Received	Commenter / Organization	GSP Chapter / Section Title	Provided Comment (a)	Proposed Response Category
Interconnected Surface Water & GDEs	1	03/11/2020	California Department of Fish and Wildlife	Basin Setting 5.3.7.2	The narrative describing the basin's interconnected surface water conditions lacks specifics and does not map surface water-groundwater interconnectivity. The interconnected surface water (ISW) conditions narrative includes estimations of the quantity of streamflow depletions as specified in 23 CCR § 354.16(f), but it does not provide specifics on how the identified resources on page 5-174 were used to determine interconnectivity, nor does the plan provide timing of depletions.	3 – Revise GSP Add map of ISW reaches and clarifying sentence(s) for how identified resources were used.
	2	03/11/2020	California Department of Fish and Wildlife	Basin Setting 5.3.7.2	West-side streams in the Delta Mendota Basin are also characterized as losing their "flows to the underlying vadose zone (net-losing streams)," and therefore, they are not considered ISW (page 5-173). 'Losing streams' can still be interconnected with surface water if there is a continuous saturated layer connecting the stream to the groundwater (Barlow and Leake 2012). The GSP uses the term 'vadose zone,' meaning an unsaturated zone, but offers no evidence of vadose zone identification or documented stream disconnection.	3 – Revise GSP Cite source that creeks overlies a vadose zone.
	3	03/11/2020	California Department of Fish and Wildlife	SMC 6.3.1 and 6.3.6	Groundwater level and interconnected surface water sustainable management criteria demonstrate limited consideration of undesirable results for environmental beneficial uses and interconnected surface waters. Groundwater Level 'undesirable results' and 'effects of undesirable results' do not evaluate specific impacts to environmental beneficial users such as GDEs (see page 6-4), nor do these sections explicitly identify fish and wildlife or habitat as beneficial users of interconnected surface water. Furthermore, depletions of interconnected surface water 'undesirable results' and 'effects of undesirable results' do not specify potential adverse impacts to environmental beneficial users other than to note the potential failure to support regulatory environmental requirements (page 6-34).	3 – Revise GSP Use quantitative metrics for effects on beneficial users when UR's are reached (e.g., X% of wells dewatered, Y AF of surface water depletions).
	4	03/11/2020	California Department of Fish and Wildlife	Basin Setting 5.3.7.6	Methods applied to the Natural Communities Commonly Associated with Groundwater (NCCAG) dataset to identify potential GDEs require further evaluation. <u>Depth to Groundwater:</u> Evaluating only areas with a depth to groundwater greater than 30 feet in Spring 2015 relies on a single-point-in-time baseline hydrology, specifically a point in time that is several years into a historic drought when groundwater levels were trending significantly lower due to reduced surface water availability. Exclusion of potential GDEs based on this singular groundwater elevation measurement is unjustified because it does not consider representative climate conditions (i.e., seasons and a range of water type years) and it does not account for GDEs that can survive a finite period of time without groundwater access (Naumburg et al. 2005), but that rely on groundwater table recovery periods for long term survival. <u>Use of a Single Resource Reference:</u> The CDWR Natural Communities Commonly Associated with Groundwater (NCCAG) Dataset web page (https://gis.water.ca.gov/app/ncdatasetviewer/sitedocs/) states: "The data included in the Natural Communities dataset do not represent DWRs determination of a GDE. However, the Natural Communities dataset can be used by GSAs as a starting point (emphasis added) when approaching the task of identifying GDEs within a groundwater basin."	4 – Identify Plan to Address as Part of GSP Update
	5	03/11/2020	California Department of Fish and Wildlife	Monitoring Network 7.2.5.6.6	Identification and verification of ISW and GDEs would benefit from additional shallow groundwater monitoring. The GSP indicates that four new monitoring wells will be placed along the San Joaquin River to monitor for depletions of ISW. Additional monitoring to ground-truth the presence of ISW, particularly along west side streams where the GSP identified streams as losing their flow to the underlying vadose zone, would benefit ISW and GDE verification.	2 – Address with Ongoing Efforts

Proposed Response:

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Category 3 – Revise GSP. Revise GSP, as appropriate using available data, and resubmit to DWR within 180-day statutory deadline.

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Interconnected Surface Water & GDEs	6	04/06/2020	National Marine Fisheries Service	Basin Setting 5.3.7.6	The GDE screening standards exclude any areas with a depth to groundwater greater than 30-feet in Spring 2015. The reasoning for this exclusion appears to concern oak tree rooting depth. However, judging oak rooting conditions based upon Spring 2015 groundwater depths is likely inappropriate, since 2015 coincided with the fourth year of California’s historic 2011-2016 drought. Spring groundwater elevations during 2015 were likely well below average, and thus not representative of past or future conditions. Focusing analysis on this time period will likely exclude significantly more area from GDE consideration as compared to using more representative groundwater elevations (i.e., those not associated with a severe drought).	1 – Already Addressed in GSP or Not Required by SGMA 30-ft depth to water is from Rhodes et. al, 2018; 2015 baseline is appropriate for SGMA.
	7	04/06/2020	National Marine Fisheries Service	Basin Setting 5.3.8	The NCCAG-based process used by the NCDMR GSP Group, as well as their identified standards for screening potential GDEs for plan consideration, is based largely on identifying wetland and vegetation features, and includes little analysis concerning aquatic species and habitat affected by streamflow depletion. The appropriate method to determine whether pumping is having “significant and unreasonable adverse impacts” on beneficial uses of surface water is to understand the level of impact (i.e., volume of streamflow depletion) and how habitat quality and functionality change because of that impact. Further data is required throughout the Delta Mendota Subbasin to establish localized relationships between streamflow depletion and the resulting instream habitat characteristics.	2 – Address with Ongoing Efforts
	8	04/06/2020	National Marine Fisheries Service	SMC 6.2	No correlation or linkage between a “significant increase in the depletion of surface water” and significant, unreasonable adverse impacts on beneficial uses of surface water, is presented in the final GSP. Thus, this threshold is inconsistent with SGMA regulations and guidance, which require consideration of not only the rate or volume of streamflow depletion, but more importantly the impact the depletion may have on beneficial uses of surface water.	2 – Address with Ongoing Efforts
	9	04/06/2020	National Marine Fisheries Service	SMC 6.3.6	The final GSP proposes to utilize only two existing gauges located along the San Joaquin River during their 2020-2025 investigation into the location, timing, and quantity of surface water depletion. The analysis would be used to establish numeric minimum thresholds for inclusion in the first 5-year GSP Update. Because the gauges, shown in Figure 6-7, are located directly next to each other, and will likely inform the groundwater/streamflow dynamic at just one discreet section along the San Joaquin River, NMFS believes additional gauge locations are necessary. We recommend that a plan for locating and implementing the additional gauges be clearly explained within the final GSP.	2 – Address with Ongoing Efforts
	10	04/06/2020	National Marine Fisheries Service	SMC 6.3.6.3	A measurable objective for streamflow depletion of “no increased depletions of surface water as a result of groundwater pumping” is inappropriate, since the minimum threshold appears to have no linkage between streamflow depletion and impacts to beneficial uses of surface water.	2 – Address with Ongoing Efforts

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Interconnected Surface Water & GDEs	11	05/15/2020	California Sportfishing Protection Alliance	Basin Setting 5.3.7	<p>These Plans fails to use the best available information to identify the geographic locations where, and times of year when, groundwater pumping depletes or is likely to deplete stream flow. Also, to the extent there are legitimate “data gaps,” the Plans fail to include a plan or protocol to fill these gaps. While the Sustainable Groundwater Management Act (SGMA) contemplates the possibility of “data gaps,” it does not authorize the wholesale “kick the can down the road” approach taken by these Plans.</p> <p>There are readily available methodologies for identifying stream reaches at risk of groundwater depletion from groundwater pumping. Mr. Kamman’s comments describe one such method previously used by the State Water Resources Control Board for mapping areas where groundwater pumping is likely to cause depletion of surface flows, known as Potential Stream Depletion Areas (“PSDA”).</p> <p>GSA’s cannot avoid location specific characterizations of the risk of undesirable results because someone else has not already developed the information.</p> <p>The Plan fails to describe any protocol to obtain usable information to identify areas and times with a high risk of groundwater pumping induced stream flow depletion.</p> <p>The PSDA methodology and resulting maps represent the best information available for this purpose. Yet the Plan fails to adopt the methodology or the resulting maps; and fails to explain why they do not represent the best information available.</p>	2 – Address with Ongoing Efforts
	12	05/15/2020	California Sportfishing Protection Alliance	SMC 6.3.6	<p>...regarding areas where the groundwater table has already dropped below the elevation of hydrologic connection to stream channels due to pumping groundwater. In these areas, the continuing loss of stream flow to groundwater remains an undesirable result. The Plans gives no thought to changing these conditions to recover hydrologic connection between such channels and their historical sources of groundwater derived base flow.</p>	1 – Already Addressed in GSP or Not Required by SGMA Not required for GSAs to correct pre-2015 conditions.
	13	05/15/2020	California Sportfishing Protection Alliance	Topic not a component of the GSP	<p>The streams and rivers in this subbasin are home to several species of endangered or special concern salmonids on the verge of extinction. The failure of the Plans to describe how they will avoid further harm to these species and contribute to their recovery from the brink of extinction represents a failure to comply with SGMA’s requirement to avoid undesirable results by establishing minimum thresholds, measurable objectives, and interim milestones supported by the best available information and best available science.</p>	1 – Already Addressed in GSP or Not Required by SGMA Not required by SGMA.
	14	05/15/2020	USBR – San Joaquin River Restoration Program	Basin Setting 5.3.7.6	<p>The SJRRP recommends that professional judgement also be used to evaluate potential GDEs beyond the 100-foot buffer. For example, at Hills Ferry Road, a 100-foot buffer fails to include most of the mature floodplain trees just upstream of the bridge. Maintaining healthy floodplain vegetation during the dry season (when it is groundwater-dependent) is important for sustaining that habitat so that it is available, high-quality salmon rearing habitat during high flows.</p>	3 – Revise GSP Clarify how the 100-foot Caltrans construction buffer correlates to GDE identification, or remove this criteria for filtering the GDE dataset.
	15	05/15/2020	USBR – San Joaquin River Restoration Program	Basin Setting 5.3.7.6	<p>The text and figures on GSP pages 5-175 to 5-178 (Figures 5-118 & 5-119) discussing possible vs. confirmed GDEs requires clarification. The text states, “Confirmed GDEs have been grouped into larger polygons based on proximity and aquifer connection,” and “Figure 5-118 and Figure 5-119 summarize the results of the GDE analysis for the Subbasin...” however confirmed GDEs don’t seem to be distinguished from possible GDEs on the figures. Figure legends use the terminology “possible GDE,” implying they do not show confirmed GDEs. In the last three paragraphs on page 5-176, it is unclear if the terms “confirmed GDE” and “possible GDE” are being used interchangeably.</p>	3 – Revise GSP Use one term, or clarify the difference between “confirmed” and “possible” GDEs.

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	16	05/15/2020	USBR – San Joaquin River Restoration Program	Sustainability Implementation 7.2.5.6.6	With the exception of SMN, monitoring sites are downstream of the Restoration Area (Fig 7-11; Table 7-11); however, where monitoring activities may overlap, the SJRRP is available for any coordination and communication that might help to augment the available information and result in well-supported decisions that will protect the SJR from potential groundwater pumping impacts.	2 – Address with Ongoing Efforts
Interconnected Surface Water & GDEs	17	05/15/2020	American Rivers	Basin Setting 5.3.7.1	The GSP asserts that creeks that drain the east side of the basin do not represent areas of potential Groundwater Dependent Ecosystems (GDEs) because they are ephemeral and/or losing streams. This statement is incorrect since ephemeral and losing streams can be ISWs and potentially representative of GDEs. Furthermore, Figure 5-64 (in Section 5.2.9.4) identifies six historic springs on the southwest corner of the basin, near Little Panoche Creek, which are noted as groundwater discharge areas. The GSP should evaluate ISWs in ephemeral streams, losing streams and springs using scientific methods.	3 – Revise GSP Provide further clarification for how ISW reaches were identified.
	18	05/15/2020	American Rivers	Basin Setting 5.3.7.1	It is unclear how the GSP identifies ISWs, other than “from a compendium of sources.” This GSP should explain the how [sic] it identified ISWs from the literature and document the underlying methodology.	3 – Revise GSP See comment #2.
	19	05/15/2020	American Rivers	Basin Setting 5.3.7.1	A figure should be produced that shows the ISW locations in the basin.	3 – Revise GSP See comment #1.
	20	05/15/2020	American Rivers	SMC 6.3.6	The GSP bases minimum thresholds for depletion of ISWs on a yet-to-be-determined percent increase in surface water depletions along interconnected stretches of surface water as a result of groundwater pumping. We are concerned with this approach, since no planned methodology is given. It is unclear how surface water depletions will be measured, particularly since connections between surface water and groundwater were not established nor discussed in the GSP.	2 – Address with Ongoing Efforts
	21	05/15/2020	American Rivers	Sustainability Implementation 7.2.5.6	The GSP states that depletions of surface water will be assessed using groundwater levels as a proxy. However, the establishment of ISWs was not based on groundwater levels developed in the GSP, so it is not clear how monitoring groundwater levels will tie into the baseline conditions.	2 – Address with Ongoing Efforts
	22	05/15/2020	American Rivers	Sustainability Implementation 7.2.5.6.5	The GSP is proposing to establish monitoring wells in four more locations along the San Joaquin River. If ISWs are determined in other locations using the more rigorous methodology that we recommend, more shallow monitoring wells should be utilized or installed to monitor surface water depletions in these locations.	2 – Address with Ongoing Efforts
	23	05/15/2020	The Nature Conservancy	Basin Setting 5.3.7	Improvements should be made to identify gaining and losing reaches and/or to account for the spatial and temporal variations in stream depletions that are inherent with California’s Mediterranean climate. Our analysis also indicates that the streams stemming from the west side of the sub-basin are likely disconnected. However, these streams may be interconnected with riparian or perched aquifers, so additional monitoring should be required to confirm disconnection. Also, any area where a lack of shallow groundwater data makes the determination of ISWs uncertain should be identified as a data gap rather than being assumed to be disconnected.	4 – Identify Plan to Address as Part of GSP Update
	24	05/15/2020	The Nature Conservancy	Basin Setting 5.3.7.6	TNC applauds the documentation of potential wetland and vegetative GDEs from TNC’s and DWR’s NC Dataset Viewer and the list of freshwater species for the Delta-Mendota Subbasin in the GSP. TNC recommends that the GSA utilize groundwater level information to support the establishment of GDEs and elaborate on the correlation of groundwater level and plant physiological data to exclude potential GDEs. Although we appreciate the inclusion of this information; the information was not analyzed, elaborated on, no data gaps were identified, and no monitoring plan was put in place to specifically improve the understanding of GDEs.	2 – Address with Ongoing Efforts
	25	05/15/2020	The Nature Conservancy	SMC 6.3	We were disappointed to see that the Sustainable Management Criteria do not describe potential impacts on environmental users of groundwater and or confirm that minimum thresholds for interconnected surface waters avoid adverse impacts to environmental beneficial users of surface water, as required under SGMA. The minimum thresholds do not describe how a decline in groundwater level will affect GDEs and ISWs.	2 – Address with Ongoing Efforts

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	26	05/15/2020	The Nature Conservancy	Sustainability Implementation 7.2.5.6	We were disappointed to see that the GSP did not include a monitoring for that adequately characterizes the interaction of GDEs and other environmental beneficial users of surface water and groundwater, as required by 23 CCR §354.34. The GSP does not adequately characterize the interaction of GDEs and other environmental beneficial users of surface water and groundwater.	2 – Address with Ongoing Efforts
Interconnected Surface Water & GDEs	27	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Basin Setting 5.3.7.6	While the plan identified potential drinking water users of groundwater, the identification of groundwater dependent ecosystems is incomplete and inconsistent with best practices. The GSP uses an arbitrary 100-foot boundary and relies on “professional judgement and local knowledge” to exclude potential groundwater dependent ecosystems. This method is based on a generalized resource protection zone used by Caltrans to protect surface features and habitats from construction-related impacts, among other things, and is not an appropriate method for evaluating groundwater dependent ecosystems.	2 – Address with Ongoing Efforts
	28	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Sustainability Implementation 7.2.5.6	We recommend the monitoring network plan in the GSP be improved, as it is currently insufficient to evaluate whether impacts on groundwater-dependent ecosystems and communities reliant upon shallow wells will be sufficiently monitored. Specifically, the plan does not include a map overlaying the monitoring wells with the occurrence of disadvantaged communities and groundwater dependent ecosystems to demonstrate that potentially impacted areas are being monitored. The monitoring network also does not adequately characterize the interaction of groundwater dependent ecosystems and other environmental beneficial users of surface water and groundwater. Groundwater dependent ecosystems are potentially located along surface water bodies where no shallow groundwater monitoring is proposed, leaving recognized data gaps unfilled. This lack of information should be identified as a data gap to be filled as part of the expansion of the monitoring network.	2 – Address with Ongoing Efforts
Water Quality	29	03/11/2021	California Department of Fish and Wildlife	Basin Setting 5.3.5	<p>The GSP abdicates responsibility for specific groundwater constituents by implying there is no nexus between some groundwater contaminants and groundwater pumping.</p> <p>The GSP explains that other constituents, including arsenic, are naturally occurring and managed through other regulatory programs, and suggests that because there are no GSA management practices that can be implemented to mitigate for these constituents (page 5-121), the GSP will not analyze and address these constituent issues. Because increases in the concentration of arsenic contamination can result from groundwater pumping, and because GSAs have the authority to manage groundwater pumping, the GSAs have a viable management opportunity to address arsenic contamination in the Delta Mendota Subbasin.</p> <p>Additionally, there are other constituents of concern on the west side of the San Joaquin Valley that were not evaluated by the GSP including selenium and uranium.</p>	3 – Revise GSP Either a) cite sources and make a stronger argument for lack of correlation between concentrations of COCs and groundwater levels, or b) create additional SMCs.
	30	05/15/2020	American Rivers	Basin Setting 5.2.8	<p>[Section 5.2.8] includes a reasonably thorough summary of historical and current information on several key groundwater pollutants. However, for most data discussed and presented in this section, it is unclear what time periods are covered.</p> <p>For example, Figures 5-21, 5-23, 5-25, 5-27, and 5-29 include maximum nitrate concentrations detected over what period? The figures state only “Maximum concentrations are based on all data collected to date for the identified wells” but no start and end dates are provided. Figures 5-22, 5-24, 5-26, 5-28 and 5-30 supposedly include the most recent nitrate collected, but the date range specified is 2000-2014. Surely more recent data than 2014 are available for many of the wells.</p> <p>The same comments apply to the data presentation and discussion for TDS, pesticides, selenium and boron. It appears that these figures may have been taken from an older document and not updated with the most recent data</p>	3 – Revise GSP Clarify dates of data.

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	31	05/15/2020	American Rivers	Basin Setting 5.2.8 and 5.3.5	Although Sections 5.2.8 and 5.3.5 mention that contaminants such as arsenic and chromium have been detected above MCLs, available data on these constituents is not presented. In addition, although 1,2,3-TCP has also been detected above MCLs in the region, this pollutant is not mentioned in the GSP. The final GSP should include an evaluation of these constituents.	3 – Revise GSP See comment #29.
Water Quality	32	05/15/2020	American Rivers	Basin Setting 5.3.5	Recent analysis does show a link between groundwater pumping and increases in arsenic concentrations elsewhere in the San Joaquin Valley (Tulare Basin) (https://www.nature.com/articles/s41467-018-04475-3). It is not clear that the GSP attempted to look for a causal nexus. A first step would be to evaluate correlations between arsenic concentrations and groundwater levels over time and space.	3 – Revise GSP See comment #29.
	33	05/15/2020	American Rivers	Basin Setting 5.3.5.2	There is ample evidence that other constituents of concern [e.g., arsenic, selenium and hexavalent chromium] could be affected by groundwater management activities included in the GSP, and therefore minimum thresholds should be set for additional constituents. In particular, specific groundwater management activities such as recharge on agricultural lands may accelerate the transport of pollutants such as pesticides through the vadose zone into aquifers, and groundwater depletion may increase arsenic concentrations in pumped water. Under some circumstances, recharge may also result in accelerated movement of plumes towards drinking water wells. Groundwater management activities may also decrease concentrations of pollutants in groundwater in some cases, such as by recharge with relatively clean water, or “pump and fertilize” practices to reduce nitrate concentrations.	3 – Revise GSP See comment #29.
	34	05/15/2020	American Rivers	Basin Setting 5.3.8	[Section 5.3.8] includes no mention of data gaps for water quality. See comments under Section 7.1 for recommendations on data needed to evaluate effects of recharge projects on water quality. Similar data needs should be evaluated to address water quality changes impacted by other groundwater management actions.	2 – Address with Ongoing Efforts
	35	05/15/2020	American Rivers	SMC 6.3.3.2	SGMA requires that minimum thresholds must be set with respect to baseline water quality as of 2015, therefore comparison to 2018 conditions are not acceptable. In addition, minimum thresholds should be set for additional constituents such as arsenic, uranium, chromium, selenium, 1,2,3-TCP, and potentially for specific pesticides pending an adequate review of recent pesticide use data in the region in conjunction with historical data already discussed in Section 5.2.8.2.3.	3 – Revise GSP Reevaluate use of 2018 baseline. 2015 is more appropriate.
	36	05/15/2020	American Rivers	Sustainability Implementation 7.1	The GSP does not include any evaluation of water quality impacts or benefits for any of these potential recharge projects, we recommend that an evaluation be conducted using available data followed by site-specific data collection if necessary. Due to the complexity of existing nitrate contamination and future loading rates, this issue should be evaluated in detail during the planning and design process. This would likely include collection of additional site-specific data. All of the potential recharge locations identified have had fairly low to moderate rates of recent application of pesticides that are on the groundwater protection list due to chemical properties that put them at high risk for transport to groundwater. Given the widespread impact of arsenic in the region, the GSA should consider how to how recharge and other water management activities can be used to mitigate arsenic concentrations in groundwater used as drinking water. It is possible that groundwater recharge may have a beneficial effect in reducing 1,2,3-TCP concentrations through dilution, it is also possible that recharge may accelerate movement of plumes toward existing drinking water wells. Before proceeding with recharge at these locations, an evaluation of how recharge is expected to affect movement of any TCP plumes should be conducted.	2 – Address with Ongoing Efforts
	37	05/15/2020	American Rivers	Sustainability Implementation 7.2.5.4	[Groundwater quality monitoring] wells identified appear to be based on existing monitoring programs in place, representing the lowest level of effort rather than targeted monitoring to achieve GSP objectives regarding evaluation of how groundwater management is affecting water quality. No criteria are presented for selection of monitoring locations.	2 – Address with Ongoing Efforts

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Topic	Comment ID (#)	Date Received	Commenter / Organization	GSP Chapter / Section Title	Provided Comment (a)	Proposed Response Category
Land Subsidence	38	03/11/2021	California Department of Fish and Wildlife	SMC 6.3.5 and 6.3.5.1.2	<p>An undesirable result for land subsidence is triggered, or considered "significant and unreasonable," for Tranquility Area using a minimum threshold of four (4) feet additional subsidence compared to 2019 benchmark elevations.</p> <p>Cumulative subsidence underlying the wildlife area has caused Department water delivery to flow in reverse. The Department has already experienced undesirable results attributable to subsidence, and any additional subsidence will be significant and unreasonable, therefore the Department does not believe a minimum threshold of four additional feet of subsidence beyond 2019 levels is justifiable.</p> <p>The Department recommends. the GSAs and neighboring GSAs include the Mendota WA as an established subsidence management area and designate the WA with a zero-foot subsidence criterion.</p>	3 – Revise GSP Reconsider what infrastructure is considered critical for subsidence.
	39	05/15/2020	DWR – State Water Project	SMC 6.3.5.2	The GSP states that it will be adopting DWR’s tolerances for additional land subsidence along the California Aqueduct to ensure minimum thresholds are compatible with DWR’s projected operations of the California Aqueduct. However, it is not clear what tolerances and/or operational limits were considered specifically for the California Aqueduct. As such, DWR’s tolerance for additional land subsidence along the California Aqueduct is a critical missing GSP element. A reasonable measurable objective for the Aqueduct would limit the subsidence rate to less than 0.01 ft per year by 2040, and a goal of no subsidence thereafter.	3 – Revise GSP Reconsider minimum thresholds to be compatible with DWR tolerance for subsidence along the California Aqueduct.
	40	05/15/2020	DWR – State Water Project	SMC/Monitoring Network 6.3.5.2 and 7.2.5.5.6	The GSP states “There are no known spatial data gaps identified for the land subsidence monitoring network within the Northern and Central Delta-Mendota Regions”. There is significant lack of monitoring sites in the southern quarter of the basin proximal to the Aqueduct and DWR considers this a significant data gap. The collection of quality monitoring data over time will be critical to delineate the extent of land subsidence along the Aqueduct. The GSP should be updated to include survey data from DWR and a plan to add additional monitoring stations as necessary.	2 – Address with Ongoing Efforts
	41	05/15/2020	DWR – State Water Project	SMC 6.3.5.2	There are no sustainability indicators specifically stated for the California Aqueduct. It appears the same sustainability indicators for the nearby Delta Mendota Canal are assumed, but this needs to be clarified, otherwise it is unclear whether the current plan addresses the effects of land subsidence on the operation and maintenance of the California Aqueduct.	3 – Revise GSP Clarify whether sustainability indicators for DMC are applicable to the California Aqueduct – the GSP implies in previous sections that both the DMC and CA are critical infrastructure, but for setting MTs, the DMC is considered the “primary infrastructure of concern.”
	42	05/15/2020	DWR – Division of Flood Management	SMC 6.3.5.3	<p>Your GSP notes potential flood impacts due to inadequate freeboard on Tranquility Irrigation District management area levees but does not evaluate increase in flood risk. Your GSP does not appear to include an evaluation of the effect of subsidence on flood system capacities, flood management infrastructure, or floodplain inundation areas.</p> <p>DWR-DFM believes there may be opportunities to refine your GSP and consider actions that could mitigate future increases in flood risk. We urge you to consider how future subsidence might generate Undesirable Results in the form of increased flood risk, adjust your GSP’s Minimum Thresholds and Measurable Objectives as necessary to moderate any increased risk, and review projects and management actions that could contribute towards the dual goals of groundwater sustainability and flood management.</p>	2 – Address with Ongoing Efforts

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	43	05/15/2020	Central Valley Flood Protection Board	SMC 6.3.5	The Board is interested in how the GSP is addressing the sustainability indicators, specifically subsidence, which potentially affects the integrity, functionality, and maintenance costs of Federal-State flood control facilities that are regulated by the Board. The Federal-State flood control facilities are considered critical infrastructure by the State. It is unlawful for any person or public agency to interfere with, obstruct the performance, maintenance, or operation of, or otherwise take actions that may adversely affect facilitates of the State Plan of Flood Control, designated floodways, or streams that are regulated by the Board (Wat. Code Sec. 8700). Any reduction in freeboard or activities affecting the integrity, functionality or maintenance of Federal-State flood control works is considered significant and must be avoided.	2 – Address with Ongoing Efforts
	44	05/15/2020	USBR – San Joaquin River Restoration Program	SMC 6.3.5.2	The minimum thresholds for TRID MA should be defined in terms of subsidence rates instead of magnitudes. This is necessary to ensure that the measurable objective remains achievable during the implementation period and will also provide a better measure of progress towards the goal.	3 – Revise GSP § 354.28 (c) (5) “The minimum threshold for land subsidence shall be the rate and extent of subsidence”.
Land Subsidence	45	05/15/2020	USBR – San Joaquin River Restoration Program	SMC 6.3.5.2	For the WSID-PID MA, the GSP should clarify why minimum thresholds relating to lateral distribution capacities cannot be set now. The GSP should also clarify why the minimum thresholds, interim milestones, and measurable objectives for the remainder of the plan area should be set only according to measured historical subsidence rates. An analysis should be done based on the current state of the DMC and the rate and magnitude of future subsidence that could occur before causing undesirable results.	2 – Address with Ongoing Efforts
	46	05/15/2020	USBR – San Joaquin River Restoration Program	SMC 6.3.5.1	The GSP should clarify if the definition of undesirable results [for land subsidence] would include damage or impacts to the SJRRP and Reclamation’s infrastructure. It is partially implied with the term “impacts to natural resources” but is not further specified in the GSP.	3 – Revise GSP See comment #38.
	47	06/09/2020	Friant Water Authority	SMC 6.3.5.1.2	The Plan recognizes subsidence impacts to the DMC and California Aqueduct, and acknowledges that such impacts will continue without mitigation. (Plan at § 5.3.6). And yet the criteria for defining undesirable results to these facilities in Section 6.3.5.1.2 (dentification [sic] of Undesirable Results) are either vague (WSID-PID MA: “...reduces the ability to deliver surface water supplies”) or appear to be overly generous (Remaining Plan area: “50 percent loss of standup capacity...and/or 75 percent overtopping of lining in the Delta-Mendota Canal as a result of inelastic land subsidence”). (Plan at 6-25.) Moreover, with respect to undesirable results affecting the DMC, it is unclear how these two criteria (i.e., the 50% and 75% thresholds for the DMC) were established.	3 – Revise GSP Cite source or give stronger argument as to why these thresholds prevent URs for beneficial users.
	48	06/09/2020	Friant Water Authority	SMC 6.3.5.2	No minimum threshold of subsidence impacts for either of the two management areas noted above is established in Section 6.3.5.2 – they are to be determined at a later date. These thresholds should be promptly established.	3 – Revise GSP Include subsidence MTs for both management areas.
	49	06/09/2020	Friant Water Authority	SMC 6.3.5.2	In its comment letter, the SWP proposes a measurable objective for the Aqueduct of limiting subsidence to a rate of less than 0.01 feet per year by 2040. With respect to the DMC, FWA would encourage a similar measurable objective in terms of increments and timing of subsidence impacts to the DMC as opposed to the percentages of loss of standup capacity and overtopping of the DMC noted above, or an explanation as to how the criteria in the Plan are more protective than the levels proposed by the SWP in terms of avoiding undesirable results to critical infrastructure such as the DMC.	3 – Revise GSP See comment #44.
Water Budget	50	04/06/2020	National Marine Fisheries Service	Basin Setting 5.4.3	The water year index for 2019 was characterized as “above average” for the San Joaquin watershed, whereas 2013 represents the second year of a historic drought. We recommend that the final GSP base their current water budget on a recent water year that represents conditions similar to those experienced in 2019. On a similar note, the historic water budget estimation would improve by utilizing a longer data set than just the 10-year period between 2003 through 2012.	2 – Address with Ongoing Efforts

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	51	05/15/2020	Kristin Dobbin, UC Davis	Basin Setting 5.4.3	The impact of population growth on projected water budgets is also not well accounted for in many cases.	3 – Revise GSP Clarify how population projections were incorporated into the water budget.
	52	05/15/2020	Audubon California	Basin Setting 5.4	Throughout the entire water budget discussion, beginning at Section 5.4 (Final GSP, p. 5-184), managed wetlands and the surface and groundwater resources applied to them are not discussed. As noted previously, the GSA removed substantial acres of “seasonally-managed areas and wetlands...due to their dependence on applied surface water;” (Final GSP, p. 5-176). Yet, these same lands do not appear to be included within the historic or current water budgets, and therefore, not reflected in the projected water budgets. This failure to include or clearly distinguish managed wetlands violates the SGMA regulations.	3 – Revise GSP §354.18 (b)(3) requires documentation of outflows from the groundwater system by water use sector. Per §351 (a), “Water use sector” is the “categories of water demand based on the general land uses to which the water is applied, including urban, industrial, agricultural, <u>managed wetlands</u> , managed recharge, and native vegetation”.
	53	05/15/2020	Audubon California	Basin Setting 5.3.8	The Final GSP did not adequately represent managed wetlands as a beneficial user or demonstrate that this water use sector’s supplies and demands were incorporated into the water budgets. This is a clear data gap but was not acknowledged as such in the Final GSP. Thus, the Final GSP does not adequately identify measures or a schedule to eliminate data gaps associated with managed wetlands.	3 – Revise GSP Include wetlands as a beneficial user in Table 4-1.
	54	05/15/2020	TNC	Basin Setting 5.4	We were disappointed to see that the water budget did not include the current, historical and projected demands of native vegetation and/or managed wetlands, as required under SGMA. This is problematic because key environmental uses of groundwater are not being accounted for as water supply decisions are made using this budget nor will they likely be considered in project and management actions.	3 – Revise GSP See comment #52.
Water Budget	55	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Basin Setting 5.4.3	The GSP does not fully incorporate climate projections into its water budget, specifically aquifer subsurface flows, which is a substantial component of the water budget. The projected water budget in the GSP only includes one climate change scenario, which is inconsistent with the Department’s climate guidance document. The plan does not include water demands for native vegetation or managed wetlands (e.g., evapotranspiration) in the water budget, as required by regulations. The plan also does not clearly identify current and projected demands by domestic well users and small water systems.	3 – Revise GSP Projected water budget with climate change should be refined to include DWR’s four climate change scenarios. See comment #52 regarding water budget.
Sustainability Goal/General SMC	56	04/06/2020	National Marine Fisheries Service	SMC 6.2	NMFS recommends the sustainability goal be restated to more closely align with SGMA regulations and guidance, which define sustainable groundwater management as “the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results.” (DWR 2017). The current goal does not adequately capture the requirement that all six undesirable results, including significant and unreasonable impacts to beneficial uses resulting from streamflow depletion, be avoided.	1 – Already Addressed in GSP or Not Required by SGMA Sustainability goal already reflects avoidance of Undesirable Results.
	57	05/15/2020	Kristin Dobbin, UC Davis	SMC 6	Further, we find that many plans provide limited to no discussion of the ways that drinking water stakeholders were involved in determining local sustainability goals and management criteria.	1 – Already Addressed in GSP or Not Required by SGMA Discussion in introduction to Section 6.

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	58	05/15/2020	California Sportfishing Protection Alliance	Basin Setting 5.4.11	The Plan fails to demonstrate achievement of sustainable groundwater management or the Plan’s sustainability goal. [Sustainable Yield] estimates are invalid because they fail to reflect consideration of undesirable results, especially on fish and wildlife species dependent on interconnected surface water.	1 – Already Addressed in GSP or Not Required by SGMA Not required.
	59	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	SMC 6.3	To protect vulnerable drinking water, we also recommend the GSP identify and evaluate the cumulative and indirect impacts of minimum thresholds on disadvantaged communities.	3 – Revise GSP See comment #3 regarding quantifying effects on beneficial users, for all sustainability indicators.
Outreach and Communication	60	05/14/2020	California Poultry Federation	Sustainability Implementation 7.1.4	The GSAs for the Northern & Central Delta-Mendota Regions have provided minimal information about the process going forward for obtaining effective public participation. See Plan at 7-21. For projects, proponents apparently will comply with notice obligations "as applicable." For management actions, "public noticing and outreach will be conducted." More detailed compliance plans, along with commitments to specific opportunities for public comment, would help assure that the Plan achieves its objectives and complies with the Department's regulations.	1 – Already Addressed in GSP or Not Required by SGMA Section 8.2.1 and Table 8-1 contain planned outreach efforts and budgets for implementation period.
	61	05/15/2020	Kristin Dobbin, UC Davis	Outreach and Communication 4.1	Among our observations thus far is that many GSPs failed to identify the full extent of drinking water users in their area. In particular, community and public water systems not operated by public water or land use agencies were unacknowledged in many plans.	1 – Already Addressed in GSP or Not Required by SGMA Table 4-1 contains domestic well owners and several community water suppliers.
	62	05/15/2020	Kristin Dobbin, UC Davis	Sustainability Implementation 7.1.4	There is discussion of outreach (email, newsletters and website) management as being an ongoing activity. There is also money budgeted for public meetings but no clear discussion or detailed plan for continuing stakeholder engagement.	1 – Already Addressed in GSP or Not Required by SGMA See comment #60.
	63	05/15/2020	Audubon California	Plan Area 2.1.2.5	While the Final GSP does include a listing of protected areas and environmental organizations in a public outreach table (Final GSP, Table 4-1, p. 4-3/4), managed wetlands are not recognized as beneficial users. The Final GSP includes major land-use divisions with a designation called "Grassland and Rangeland" (Final GSP, p. 2-19). The accompanying description does not include any representation of whether managed wetlands are part of this designation, or that a significant number of managed wetlands are actively irrigated.	3 – Revise GSP See comment #53.
Outreach and	64	05/15/2020	USBR – San Joaquin River Restoration Program	Outreach and Communication 4.1	The SJRRP is not listed as a stakeholder group in Table 4-1. The SJRRP is a stakeholder group because a portion of Reach 5 of the SJRRP area borders the Delta-Mendota North-Central Subbasin along the SJR between the Stanislaus-Merced County line and the confluence with the Merced River. In addition, Restoration Flows and fish pass through the entire length of the SJR though the Subbasin on the way to (and from) the Delta. Thus, management of groundwater interactions with ISW and GDEs in the Subbasin will impact the success of the SJRRP in meeting its goals.	3 – Revise GSP List SJRRP as a stakeholder group in Table 4-1.

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	65	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	SMC 6.3	<p>We recommend the GSA continue efforts to identify and engage beneficial users representing disadvantaged communities and the environment and to incorporate the interests of these users into the calculation and update of sustainable management criteria. We provide two specific examples:</p> <ol style="list-style-type: none"> 1. By the time of the 5-year update, the plan must demonstrate whether “groundwater extractions result in significant depletions of interconnected surface waters” (CWC § 10735.2.(a)(5)(B)(ii)). To define significant depletions, beneficial users of surface water should be identified and considered in development of and reporting on sustainable management criteria. 2. In order to ensure best available information about impacts to beneficial users reliant on shallow groundwater, we recommend the GSA improve local information about the location and condition of both active and abandoned groundwater wells. The Department’s well drilling report database has provided an initial and important data source for development of GSPs, but local investigations would improve accuracy regarding well location, condition and water quality. We are also concerned that because well abandonment data is largely unavailable, there is potential for migration of surface contaminants to groundwater from improperly closed wells. We recommend the GSA coordinate with other local agencies to identify inactive and abandoned wells to ensure that they have been properly retired. 	2 – Address with Ongoing Efforts
	66	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Outreach and Communication 4.3.1	We note that, while the GSA included our comments on the draft Plan in the final Plan, it did not provide a public response to any of the comment letters submitted and published as Appendix C, nor did it appear to modify Plan contents based on our comments. We recommend that the GSP be required to respond to public comments within 180 days. Looking ahead, we recommend that the annual reports provide specifics about implementation of the Stakeholder and Community Engagement Plan (SCEP), particularly how the public is kept informed of plan implementation.	2 – Address with Ongoing Efforts
Projects and Management Actions	67	05/15/2020	Central Valley Flood Protection Board	Sustainability Implementation 7.1.5	Some or all of the proposed projects identified in the GSP are within the Board’s jurisdiction, thereby requiring Board approval. However, it is not clear if the infrastructure to divert water from these rivers is proposed or if the project proponent has existing Board encroachment permits. The Sites Reservoir Project notes that a 14-mile-long pipeline from the Sacramento River will be constructed to divert water to offstream storage. It is unclear if the infrastructure to divert water is existing and/or authorized. The Sites Reservoir Project notes that a 14-mile-long pipeline from the Sacramento River will be constructed to divert water to offstream storage. It is unclear if the infrastructure to divert water is existing and/or authorized.	3 – Revise GSP Add clarifying information regarding expected permitting requirements for projects [§ 354.44 (1) (b)].
	68	05/15/2020	California Sportfishing Protection Alliance	Sustainability Implementation 7.1	<p>The Plan fails to demonstrate achievement of sustainable groundwater management or the Plan’s sustainability goal because it relies on projects of unknown feasibility to reduce groundwater pumping.</p> <p>The Plan relies on the implementation of numerous “projects and management actions” to achieve the Plan’s sustainability goal, but concedes that these projects and management actions “require further analysis and permitting to determine feasibility and cost effectiveness. The Plan’s failure to demonstrate the feasibility of these projects and management actions means the Plan fails to demonstrate achievement of sustainable groundwater management or the Plan’s sustainability goal.</p>	2 – Address with Ongoing Efforts
	69	05/15/2020	USBR – San Joaquin River Restoration Program	Sustainability Implementation 7.1.1.2.1	The possible management action of implementing groundwater pumping rules is stated in relation to minimum thresholds of groundwater elevations. However, in Chapter 6 the minimum thresholds are all given in terms of subsidence rates or magnitudes (tied to ground surface elevation measurements).	1 – Already Addressed in GSP or Not Required by SGMA Pumping rules are in respect to groundwater level MTs (which are well depths), not subsidence MTs.

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Projects and Management Actions	70	05/15/2020	American Rivers	Sustainability Implementation 7.1	AR is also concerned that there is a heavy reliance on new water supplies that are unlikely to be feasible. Furthermore, it is not clear if there has been much if any coordination yet between GSAs to see if their proposals of water transfers from other districts pencil out. In other words, neighboring GSPs may be depending on each other to make up a significant portion of their water budget shortfall via water transfers, unbeknownst to each other.	2 – Address with Ongoing Efforts
	71	05/15/2020	American Rivers	Sustainability Implementation 7.1	Some projects did not list volumes nor water source. We recommend that the GSP provide more information on the projects to allow better determination of cumulative impacts to surface water bodies.	3 – Revise GSP Clarify water sources and volumes, where applicable.
	72	05/15/2020	Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, American Rivers, The Nature Conservancy, and Union of Concerned Scientists	Sustainability Implementation 7.1	We reviewed the projects identified in the GSP, including the estimated yield and funding source for each project. We found that this plan, if implemented as noted, would address 23% of the identified overdraft of the basin by year 5. We are concerned that continued overdraft will disproportionately impact beneficial users of water that are already suffering – namely environmental users and disadvantaged communities. We urge more aggressive actions to avoid serious impacts to these users, including considering demand reduction measures, and developing a plan to address disadvantaged residents whose water supply could be impacted by falling water levels through actions such as a domestic well mitigation program.	2 – Address with Ongoing Efforts
	73	06/09/2020	Friant Water Authority	Sustainability Implementation 7.1.1.6	The Plan relegates the potential imposition of a groundwater extraction fee as part of “Tier 3 Management Actions,” which “would be implemented as needed sometime after 2026.” (Plan at § 7.1.1.6 and § 7.1.1.6.1.) The Plan should expedite the adoption of a groundwater extraction fee if the revised thresholds of undesirable results to the DMC and Aqueduct are exceeded or will likely be exceeded before an established period. We believe it is fair and appropriate for those most responsible for the subsidence damage to the DMC and to the Aqueduct to provide funding to help pay for the cost to correct the capacity of these conveyance facilities resulting from the transitional groundwater pumping permitted under the Plan.	2 – Address with Ongoing Efforts
Plan Area	74	05/15/2020	Kristin Dobbin, UC Davis	Plan Area 2.1.2.3	There is no information about depth of domestic wells or Public Supply Wells. Figure 2-10 displays the density and spatial distribution of domestic wells in the GSP region. No information about depths or total number is presented in the text.	3 – Revise GSP Perform or describe a well impact analysis to provide information on domestic wells.
	75	05/15/2020	Kristin Dobbin, UC Davis	Topic not a component of the GSP	No discussion found [on overview of drinking water impacts experienced during the 2012-2016 drought] despite there being a recent drought section under current conditions on page 5-92.	3 – Revise GSP Consider discussing drought impacts to domestic well users.
Misc.	76	05/15/2020	Kristin Dobbin, UC Davis	Topic not a component of the GSP	No mention [of the human right to water (AB 685)].	3 – Revise GSP Consider directly addressing the human right to water.
	77	05/15/2020	Kristin Dobbin, UC Davis	Topic not a component of the GSP	No discussion of drinking water affordability in the plan and/or accommodations for affordability (e.g., exemptions/reductions/rebates for fees or penalties for low-income users).	1 – Already Addressed in GSP or Not Required by SGMA Not required.
	78	05/15/2020	California Sportfishing Protection Alliance	Topic not a component of the GSP	Individual GSPs in this subbasin must coordinate to assess interconnected groundwater conditions that effect listed species impacts across the entire subbasin. Each Plan cannot myopically focus on its own boundaries.	2 – Address with Ongoing Efforts
	79	05/15/2020	USBR – San Joaquin River Restoration Program	Basin Setting 5.3.7.6	Table 5-10 beginning on GSP page 5-179 fails to include Chinook salmon or sturgeon as potential freshwater species. Fremont Cottonwood is also not listed as a potential freshwater-dependent species.	1 – Already Addressed in GSP or Not Required by SGMA Cited dataset does not contain these species.

Proposed Response:

Category 1 – Addressed in GSP or Not Required by SGMA. Prepare response to comments letter and note how topic is addressed in GSP, or that it is not required.

Category 2 – Address with Ongoing Effort. Potential commitment for acquisition of additional data and more complete response to comments in the 5-Year GSP Update. Prepare response to comments letter and describe in-progress efforts and actions to address comment and concern (including ISW well installation, subsidence study, data collection, USGS/USBOR groundwater modeling, further development of projects to meet SGMA objectives, requests for grant funding, etc.).

Category 3 – Revise GSP. Revise GSP, as appropriate using available data, and resubmit to DWR within 180-day statutory deadline.

Category 4 – Identify Plan to Address as Part of GSP Update. Comment cannot be addressed by ongoing efforts or within the 180-day deadline. A plan to address the comment will be identified in the 2025 GSP update.

Abbreviations:

GDE = groundwater dependent ecosystem
 GSP = Groundwater Sustainability Plan for the Northern & Central Delta-Mendota Subbasins dated November 2019.
 ISW = interconnected surface water
 SMC = sustainable management criteria

Footnotes:

(a) Comments transcribed from public comment letters downloaded from DWR SGMA portal on 17 November 2021.
 Comments from DWR on the submitted GSP are not yet available.

Table 1: Northern & Central Delta-Mendota GSP Implementation Commitments - in Text of Groundwater Sustainability Plan

Task	Activity	Related	GSP Deadline	GSP Reference ^(a)	Status as Reported in WY2021 Annual Report	Comments	Status of Activities ^(b)
1	Update/refine monitoring network as new wells are constructed and well construction information is obtained						
1a	Well Census and Inventory project	--	2025	--	Completed in February 2022	Reconciliation of Well Census and Inventory information with update to SGMA monitoring network remains to be done.	Additional changes to NCDM representative monitoring network (RMN) will be necessary as additional wells were removed from the RMN during 2022 sampling events.
1b	Video log 14 wells that are missing well construction information	--	2025	NCDM GSP Section 7.2.5.1.6	N/A	Identified as an optional task in Well Census and Inventory project scope but not performed.	--
1c	Determine if video-logged wells are appropriate to add to the [SGMA] monitoring network	1a	2025	CC Section 4.2.8; NCDM GSP Sections 5.3.8 and 7.2.5.1.6	N/A	--	--
2	Establish ISW SMC as a rate or volume of surface water depletions						
2a	Install five additional ICSW monitoring wells adjacent to the San Joaquin River	--	2025	CC Section 4.2.8; NCDM GSP Section 5.3.8	N/A	\$929,400 awarded to Subbasin in SGMA Round 1 Implementation Grant for data gap filling efforts, including installation of at least one (1) and up to four (4) ICSW monitoring wells in the NCDM region.	SGMA Round 1 Funding Agreement executed with DWR on 10/7/22. Consultant RFP in progress. Funding for additional ISW wells in NCDM was included in SGMA Round 2 Grant Application submitted on 12/16/22.
2b	Collect and analyze data from ICSW monitoring wells	2a	2030	CC Section 4.2.8; NCDM GSP Section 5.3.8	N/A	Limited data collection and analysis to date.	--
3	GDE mapping						
3a	Analyze locations of potential GDEs using recent groundwater elevation/depth contour mapping	--	2025	CC Section 4.2.8; NCDM GSP Section 5.3.8	N/A	Limited/no data collection and analysis to date.	--
4	Re-evaluate land subsidence SMC considering new data and studies						
4a	Collect and analyze subsidence data from 2020-2025 and identify where there are spatial data gaps	--	2025	CC Section 4.2.8	Ongoing, data collected WY2020 and 2021	Completed <i>Conceptual Master Plan for Subsidence Monitoring and Management for the Delta-Mendota Subbasin</i> in June 2022.	Two NCDM GSAs performed subsidence monitoring at end of 2022. USBR survey planned for Dec. 2023.
4b	Work with USBR to revise CVHM2 model to simulate interactions between groundwater extractions and land subsidence	--	2025	CC Section 5.4.4	N/A	Intermittent coordination meetings have occurred between SLDMWA, GSAs, and USBR.	Reviewed groundwater model with USBR & USGS on 12/12/2022.
4c	Determine portion of subsidence caused by groundwater extraction within and outside the Subbasin at each RMS	4a, 4b	2025	NCDM GSP Section 6.3.5.3	N/A	\$929,400 awarded to Subbasin in SGMA Round 1 Implementation Grant for portion of data gap filling efforts, including subsidence monitoring.	SGMA Round 1 Funding Agreement executed with DWR on 10/7/22. Consultant RFP in progress.
4d	Review and revise HCM to incorporate new subsidence data, including AEM survey and results from the subsidence study	4a, 4c	2025	CC Section 5.4.4; NCDM GSP Section 6.3.5.3	N/A	Limited/no analysis to date.	--
4e	Assess allowable land subsidence on a Subbasin and localized basis	4a, 4c, 4d	2025	CC Section 5.4.4; NCDM GSP Section 6.3.5.3	N/A	Limited/no analysis to date.	--
4f	Conduct an updated subsidence DMC Conveyance Capacity Analysis	--	2025	NCDM GSP Section 5.3.8	N/A	SLDMWA led effort. SLDMWA noted that work has been done to create a model in HEC-RAS and an EIR for Subsidence Correction Project is expected to be complete mid-2023.	--

Task	Activity	Related	GSP Deadline	GSP Reference ^(a)	Status as Reported in WY2021 Annual Report	Comments	Status of Activities ^(b)
5 Refine/update water budget and sustainable yield estimates							
5a	Establish additional CIMIS and/or other weather stations to define spatial variability of precipitation and evapotranspiration	--	2025	NCDM GSP Section 5.3.8	N/A	Limited/no analysis to date.	--
5b	Reconciliation of water budget nomenclature in individual GSPs with terminology used in the Common Chapter	--	2025	CC Section 4.3.1	N/A	Limited/no analysis to date.	--
5c	Improve estimated allocation of groundwater extraction between two aquifers (based on well construction information and inventory projects completed by GSAs in 2022)	1a, 1b	2025	CC Section 4.3.1	N/A	Limited/no analysis to date. Reconciliation of Well Census and Inventory information with update to pumping estimates remains to be done. Some GSAs have initiated efforts to register wells and require metering/water use reporting, but incomplete records to date.	--
5d	Improve storage estimates of each aquifer using data collected from 2020-2025	--	2025	CC Section 4.3.1	N/A	Limited/no analysis to date.	--
6 Update Sustainable Management Criteria							
6a	Develop short-term (acute) thresholds for Chronic Lowering of Groundwater Levels	--	2025	CC Section 5.4.1; NCDM GSP Section 6.3.1.2	N/A	Limited/no analysis to date.	--

Abbreviations:

AEM = Airborne Electromagnetic	N/A = Not Applicable
CC = Common Chapter	NCDM = Northern & Central Delta-Mendota
CIMIS = California Irrigation Management Information System	PID = Patterson Irrigation District
CVHM2 = Central Valley Hydrologic Model, Version 2	RMS = Representative Monitoring Site
DMC = Delta-Mendota Canal	SGM = Sustainable Groundwater Management
EIR = Environmental Impact Report	SGMA = Sustainable Groundwater Management Act
GDE = Groundwater Dependent Ecosystem	SLDMWA = San Luis and Delta-Mendota Water Authority
GSA = Groundwater Sustainability Agency	SMC = Sustainable Management Criteria
GSP = Groundwater Sustainability Plan	USBR = United States Bureau of Reclamation
HCM = Hydraulic Conceptual Model	WSID = West Stanislaus Irrigation District
ICSW = Interconnected Surface Water	WY = Water Year

Notes:

- (a) Commitments identified in this table were made in either the 2022 Amended NCDM GSP or Common Chapter for the Delta-Mendota Subbasin GSPs.
- (b) Based upon information communicated by GSAs.
- (c) A yellow highlighted row indicates that the activity was not included in the 2020 GSP submittal and was added during the 2022 GSP revision process.

Table 2: Northern & Central Delta-Mendota GSP Implementation Commitments - Projects

Tier ^(a)	Project ^(b)	Project Proponent	Estimated Cost	Status as Reported in WY2021 Annual Report ^(c)	Comments ^(d)	Status of Activities ^(e)
1	Los Banos Creek Recharge and Recovery Project	San Luis Water District	\$9,116,374	Preliminary design completed in 2018; additional steps pending funding for CEQA, design, and construction.	\$1,000,000 awarded in SGMA Round 1 Implementation Grant.	SGMA Round 1 Funding Agreement executed with DWR on 10/7/22.
1	Orestimba Creek Recharge and Recovery Project	Del Puerto Water District	\$7,923,450	CEQA/NEPA complete; design anticipated complete in early Spring 2022; Construction anticipated complete by end of 2023.	--	Design complete in October 2022.
1	North Valley Regional Recycled Water Program (NVRWP) – Modesto and Early Turlock Years	Del Puerto Water District	\$96,000,000	Completed Turlock and Modesto components in March 2020; Ceres component in progress, funding requested through SGMA Round 1 Implementation Grant; anticipated completion in 2023.	Portions of project are completed. \$250,150 awarded in SGMA Round 1 Implementation Grant.	SGMA Round 1 Funding Agreement executed with DWR on 10/7/22.
1	City of Patterson Percolation Ponds for Stormwater Capture and Recharge	City of Patterson	\$7,800,000	Project still in conceptual and EIR phase (linked to planned development); preliminary design to occur in 2022.	--	Preliminary design initiated and in progress.
1	Kaljia Drainwater Reuse Project	San Luis Water District	\$16,500,000	Preliminary design and CEQA/permitting in progress; design planned for 2023-2025, construction planned to start in 2025.	--	--
1	West Stanislaus Irrigation District Lateral 4-North Recapture and Recirculation Reservoir	West Stanislaus Irrigation District	\$1,120,000	FS completed in Sept 2021; design anticipated to take 8 months with CEQA in parallel.	\$250,150 awarded in SGMA Round 1 Implementation Grant.	SGMA Round 1 Funding Agreement executed with DWR on 10/7/22. Construction planned to start in late 2024.
1	Revision to Tranquillity Irrigation District Lower Aquifer Pumping	Tranquillity Irrigation District	\$0	Well Water Operations Plan established in 2017 and implemented on an annual basis.	--	--
2	Del Puerto Canyon Reservoir Project	Del Puerto Water District	\$491,300,000	30% preliminary design anticipated to be complete in 2022; CEQA completed in October 2020; NEPA to be completed fall 2024; 100% design and permitting anticipated complete in 2024; construction anticipated complete in 2028.	--	--
2	Little Salado Creek Groundwater Recharge and Flood Control Basin	Stanislaus County	\$7,710,000	Scheduled for development in subsequent phases of the overall CLIBP project.	--	--
2	Patterson Irrigation District Groundwater Bank and/or Flood MAR-type Project	Patterson Irrigation District	TBD	Consultant retained for FS; acquired small potential property.	--	--
2	West Stanislaus Irrigation District Lateral 4-South Recapture and Recirculation Reservoir	West Stanislaus Irrigation District	\$1,500,000	Preliminary design complete in September 2021.	Partially funded under IRWM grant.	--
2	Ortogonalita Creek Groundwater Recharge and Recovery Project	San Luis Water District	TBD	N/A	Partially funded under IRWM grant.	Funding request was included in SGMA Round 2 Grant Application.

Abbreviations and Notes provided on page 2

Abbreviations:

CEQA	= California Environmental Quality Act
CLIBP	= Crows Landing Industrial Business Park
EIR	= Environmental Impact Report
FS	= Feasibility Study
IRWM	= Integrated Regional Water Management
MAR	= Managed Aquifer Recharge
N/A	= Not Applicable
NCDM	= Northern & Central Delta-Mendota
NEPA	= National Environmental Policy Act
SGM	= Sustainable Groundwater Management
TBD	= To Be Determined
USBR	= United States Bureau of Reclamation
WY	= Water Year

Notes:

- (a) Projects and Management Actions divided into Tiers (pg 7-1 of Revised GSP):
- Tier 1 – Near-term projects and management actions that the Groundwater Sustainability Agencies (GSAs) are committed to implementing at this time. These projects and management actions are either currently in the process of being implemented or could be implemented in the near future (constructed and operational) within the next five years (by 2025).
- Tier 2 – Projects and management actions that have been identified and require further development before implementation can occur. It is anticipated that these projects and management actions could be developed over the next five years and implemented beginning in 2026 or later, pending re-evaluation prior to the 5-year GSP Update in 2025.
- Tier 3 – Longer-term projects and management actions that may be implemented in the future as needed. Many of these projects are outside of the GSAs' control but could have implications on surface water availability and/or are additional projects/management actions that could be implemented under an adaptive management approach. For purposes of this analysis, did not include the Tier 3 projects listed in the GSP (because implementation of the identified projects is driven by others).
- (b) Project information obtained from Section 7 of the 2022 amended NCDM GSP.
- (c) Consolidated WY 2021 Annual Report dated March 2022, incorporating updated information obtained from GSAs in 3Q2022 GSP Implementation Tracking Tools.
- (d) Per SGMA Budget Spending Plan circulated by John Brodie on 12 August 2022, NCDM was awarded a total of \$1,500,300 from SGMA Round 1 grant to Subbasin.
- (e) Based upon information communicated by GSAs.

Table 3: Northern & Central Delta-Mendota GSP Implementation Commitments - Management Actions

Tier ^(a)	Management Action ^(b)	Status as Reported in WY2021 Annual Report ^(c)	Comments	Activities Performed in WY 2022 ^(d)
1	Lower Aquifer Pumping Rules for Minimizing Subsidence	GSA's have coordinated on developing Lower Aquifer pumping rules	Limited/no analysis or discussion to date. Some GSAs (e.g., CDM, PID and WSID) have adopted ordinances requiring the registration of wells and/or reporting of pumping. Wells in other GSAs are equipped with meters. This pumping data, coupled with the <i>Well Census and Inventory</i> Report, could be used to at least better understand the location and distribution of pumping.	GSA efforts to require metering and reporting of pumping are continuing. CDM GSA has developed a draft Administrative Policy for metering/reporting.
1	Maximize Use of Other Water Supplies	N/A	No formal policies implemented.	SNCWD signed Partial Agreement with USBR for CVP surface water supply, with additional USBR contracting planned
1	Increasing GSA Access to and Input on Well Permits	GSAs have coordinated on increasing GSA participation in well permitting process	Governor's EO N-7-22 provides some clarity and authority. Merced County and Stanislaus County have updated their well permitting process and requirements.	GSA effort continues on this topic.
1	Drought Contingency Planning in Urban Areas	Conducted as part of UWMPs	Addressed in adopted 2020 UWMPs (applies to City of Patterson).	--
1	Fill Data Gaps	N/A	See "Implementation Activities" tab for specific data-gap filling efforts. SGMA Round 1 Implementation Grant awarded \$929,400 to Subbasin for Data Gaps and Monitoring.	SGMA Round 1 Funding Agreement executed with DWR on 10/7/22 includes data gap filling. Additional ISW wells in NCDM included in SGMA Round 2 Grant Application submitted on 12/16/22.
2	Develop Program to Incentivize Use of Surface Water and Reduce Groundwater Demand	N/A	Limited/no analysis or discussion to date.	--
3	Groundwater Extraction Fee with Land Use Modifications	N/A	Limited/no analysis or discussion to date.	--
3	City of Patterson Reduced Groundwater Use Portfolio	N/A	Limited/no analysis or discussion to date.	--
3	Rotational Fallowing of Crop Lands	N/A	Limited/no analysis or discussion to date.	--

Abbreviations:

- CDM = Central Delta-Mendota
- EO = Executive Order
- GSA = Groundwater Sustainability Agency
- GSP = Groundwater Sustainability Plan
- NCDM = Northern & Central Delta-Mendota
- N/A = Not applicable
- PID = Patterson Irrigation District
- SGM = Sustainable Groundwater Management
- UWMP = Urban Water Management Plan
- WSID = West Stanislaus Irrigation District
- WY = Water Year

Notes Provided on Page 2

Notes:

- (a) Projects and Management Actions divided into Tiers (pg 7-1 of 2022 Amended NCDM GSP):
 - Tier 1 – Near-term projects and management actions that the Groundwater Sustainability Agencies (GSAs) are committed to implementing at this time. These projects and management actions are either currently in the process of being implemented or could be implemented in the near future (constructed and operational) within the next five years (by 2025).
 - Tier 2 – Projects and management actions that have been identified and require further development before implementation can occur. It is anticipated that these projects and management actions could be developed over the next five years and implemented beginning in 2026 or later, pending re-evaluation prior to the 5-year GSP Update in 2025.
 - Tier 3 – Longer-term projects and management actions that may be implemented in the future as needed. Many of these projects are outside of the GSAs’ control but could have implications on surface water availability and/or are additional projects/management actions that could be implemented under an adaptive management approach.
- (b) Management Action information obtained from Section 7 of the 2022 Amended NCDM GSP.
- (c) Consolidated WY 2021 Annual Report dated March 2022, incorporating information provided by GSAs in 3Q2022 GSP Implementation Tracking Tools.
- (d) Based upon information communicated by GSAs.

Table 4: Northern & Central Delta Mendota GSP Implementation - Status of Well Ordinances

Organization	Ordinance Identification	Ordinance Date	Text
Fresno County	Ordinance No. 00-13	September 2000	Section 14.03.090 - Conditions of permit approval. "C. If requested by the county, the permittee shall share with the county groundwater monitoring information and data, and, where practicable, the parties shall coordinate their groundwater management efforts to effectively monitor groundwater resources throughout the county"
Merced County	Ordinance No. 1930 An Ordinance to Prevent the Mining and Export of Groundwater from the Unincorporated Portions of Merced County	March 2015	Section 9.27.065 - Groundwater Monitoring & Reporting "A. Monitoring. All new permits for wells or groundwater exports under the scope of this ordinance shall be measured by a properly installed and maintained water measuring device satisfactory to the Department of Public Health, Division of Environmental Health. As an alternative to water measuring devices, other reasonable methods to determine groundwater extraction may be used if approved by the Department of Public Health, Division of Environmental Health. B. Reporting. All persons, including Public Works Agencies, that extract groundwater within the County shall cause to be prepared and submitted to the Department of Public Health, Division of Environmental Health, annual reports of groundwater information that are necessary to monitor the existing condition of groundwater resources within the County....The required information to be reported shall include without limitation water level and pumping data...."
Stanislaus County	Ordinance CS 1155, Section 9	2014	Section 9.37.065 Groundwater monitoring. "A. All persons, including public water agencies that extract groundwater within the county shall cause to be prepared and submitted to the county department of environmental resources periodic reports of groundwater information that are reasonably necessary to monitor the existing condition of groundwater resources within the county, to determine trends, or to develop effective sustainable groundwater management plans and policies. A de minimis extractor shall not be required to submit such information. B. The department shall develop and recommend regulations to be adopted by the board that establish the frequency and timing of required reports, and the required information to be monitored, including, without limitation, water level and pumping data, or other data necessary for any other method to determine groundwater production."
Patterson Irrigation District	Resolution 05-2020: Patterson Irrigation District Groundwater Sustainability Agency Rule Regarding Irrigation Well Meters	15 April 2020	"The owner of any Groundwater Extraction Facility within the PID GSA must register that Groundwater Extraction Facility with the PID GSA... ...The owner of every Groundwater Extraction Facility within the PID GSA must measure use of that Groundwater Extraction Facility by a water-measuring device (Meter) satisfactory to the PID GSA... ...Meters must be installed on all Groundwater Extraction Facilities by January 1st, 2021."
West Stanislaus Irrigation District	West Stanislaus Irrigation District Groundwater Sustainability Agency Policy Regarding Irrigation Well Meters	2020	"The owner of any Groundwater Extraction Facility within the WSID GSA must register that Groundwater Extraction Facility with the WSID GSA... ...The owner of every Groundwater Extraction Facility within the WSID GSA must measure use of that Groundwater Extraction Facility by a water-measuring device (Meter) satisfactory to the WSID GSA. Meters must be installed on all Groundwater Extraction Facilities by January 1st, 2021. The meter shall measure all flow rate in gallons per minute, or cubic feet per second and totalize total extractions in gallons, cubic feet, or in acre-feet."

Organization	Ordinance Identification	Ordinance Date	Text
Del Puerto Water District	Draft Groundwater Well Metering Policy	15 June 2022	Covers well registration, metering, access, costs, semi-annual reporting, maintenance, and exclusions. Packets to be sent to customers explaining the new well registration and metering policy requirements in the near future.
City of Patterson	Ordinance No. 348, Section 1	1981	13.20.010 Private wells—Construction prohibited. No person, firm or corporation may drill, dig or install a water well in the city for any purpose whatsoever, save and except the Patterson City Water Company.
Central Delta-Mendota GSA	Central GSA Resolution Nos. 2021-01 and 2021-02	25 January 2021	Adopted two Resolutions on 25 January 2021: require registration of all wells by 4/1/2021, impose fee for late registration. Developed draft Well Metering and Reporting Policy in 2022 to require installation of meters on production wells within the GSA and reporting of pumped groundwater volumes.
Widren Water District	N/A	N/A	N/A. The two operational supply wells in WWD are equipped with meters.

Abbreviations:

- GSA = Groundwater Sustainability Agency
- GSP = Groundwater Sustainability Plan
- N/A = Not Applicable
- NCDM = Northern & Central Delta-Mendota
- No. = Number
- PID = Patterson Irrigation District
- SGMA = Sustainable Groundwater Management Act
- WSID = West Stanislaus Irrigation District

Notes:

- (a) Online search for ordinances adopted by NCDM GSAs and member agencies performed in August 2022.
- (b) Note that County Ordinances are also discussed in Section 2.3.2 of the 2022 amended NCDM GSP. Discussion speaks more to permitting process for well construction/destruction and less to measuring of pumped groundwater.

GSP Implementation Schedule Northern & Central Delta-Mendota GSP Region

3-MONTH LOOK-AHEAD SCHEDULE

TASK	RESPONSIBLE PARTY	START	END	FEB				MAR					APR				MAY			
				WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3	WEEK 4
BASIN-SCALE COORDINATION																				
Annual Report																				
WY2022 DM Consolidated Annual Report	W&C / Basin GSAs	10/10/22	4/1/23	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Intra-Basin Coordination																				
Subbasin Coordination Committee	Basin GSAs		Bi-Monthly			█				█				█					█	
DM Technical Working Group	Basin GSAs		As-needed																	
DMS Working Group	Basin GSAs		As-needed																	
SGM Implementation Grant																				
Perform SGM Round 1 Grant Approved Activities	Basin GSAs	10/7/22	4/30/25	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
N-C REGION COORDINATION / ADMINISTRATION																				
N-C Coordination Meetings																				
Northern and Central Region Mngmt Committees Meetings	GSAs		Monthly				█				█				█				█	
Northern Region Management Committee Meetings	GSAs		As-needed																	
Central Region Management Committee Meetings	GSAs		As-needed																	
Technical/Finance Working Group Meetings	GSAs		TBD																	
GSP Progress Checks																				
GSP Implementation Progress Reports (Tracking Tools)	GSAs		Semi-Annual																	
Quarterly GSP Implementation Update Reports	W&C		Quarterly																	
N-C REGION GSP IMPLEMENTATION																				
Water Level Monitoring																				
Collect Spring Water Level Data	GSAs / SLDMWA	2/1/23	4/30/23	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Data QA/QC	GSAs / W&C	4/30/23	5/31/23																	
Install New Monitoring Wells	GSAs	7/1/20	12/31/23	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Water Quality Monitoring																				
Collect Water Quality Data	GSAs	5/1/23	8/31/23																	
Data QA/QC	GSAs / W&C	7/31/23	9/30/23																	
Data Consolidation/Upload to DMS	GSAs / W&C	7/31/23	9/30/23																	
Interconnected Surface Water Monitoring																				
Install/Identify New Monitoring Wells	WSID / PID / NWDM	3/1/20	6/30/23	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Meet with Adjoining GSP Groups	WSID / PID / NWDM		As-needed																	
Collect Spring Water Level Data	WSID / PID / SLDMWA	2/1/20	4/30/20	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Data QA/QC	WSID / PID / W&C	4/30/20	5/31/20																	
Collect Fall Water Level Data	WSID / PID / SLDMWA	9/1/20	10/31/20	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Data QA/QC	WSID / PID / W&C	10/31/20	11/30/20																	
Data Consolidation/Upload to DMS	WSID/ PID / W&C	10/31/20	11/30/20																	
Projects^(a)																				
Los Banos Creek Recharge and Recovery Project	SLWD	In design	TBD	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Kaljia Drainwater Reuse Project	SLWD	PD in 2022	TBD	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Orestimba Creek Recharge and Recovery Project	DPWD	In design	12/31/23	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
NVRRWP – Increased Modesto and Turlock Portions ^(b)	DPWD		Complete																	
Percolation Ponds for Stormwater Capture and Recharge	City of Patterson	PD in 2023	TBD	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
WSID Lateral 4-North Recapture and Recirculation Reservoir ^(c)	WSID	Design in 2023	Est. 2024	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Revision to TRID Lower Aquifer Pumping ^(d)	TRID		On-going	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	

GSP Implementation Schedule Northern & Central Delta-Mendota GSP Region

3-MONTH LOOK-AHEAD SCHEDULE

TASK	RESPONSIBLE PARTY	START	END	FEB				MAR					APR				MAY			
				WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 1	WEEK 2	WEEK 3	WEEK 4
Management Actions^(a)																				
Lower Aquifer Pumping Rules for Minimizing Subsidence	GSA's	6/25/20	12/31/23																	
Maximize Use of Other Water Supplies	GSA's	6/25/20	10/31/24																	
Increasing GSA Access to and Input on Well Permits	GSA's	6/11/20	3/31/23																	
Drought Contingency Planning in Urban Areas	GSA's	Complete																		
Fill Data Gaps	GSA's	2/1/20	4/30/25																	
Additional GSP Activities																				
USGS / Basin Model	USGS/USBR	3/1/20	TBD																	
Develop 2025 GSP Update	GSA's / TBD	1/1/23	10/31/24																	
Project Management and Communication	SLDMWA / EKI	3/1/22	2/28/23																	
As-Needed Technical Support	EKI / W&C	3/1/22	2/28/23																	

Abbreviations

DMS = Data Management System	GSP = Groundwater Sustainability Plan	QA/QC = Quality Assurance/Quality Control	USBR = United States Bureau of Reclamation
DM = Delta Mendota	NVRRWP = North Valley Regional Recycled Water Program	SLDMWA = San Luis & Delta-Mendota Water Authority	USGS = United States Geological Survey
DPWD = Del Puerto Water District	P&MA = Projects and Management Actions	SLWD = San Luis Water District	W&C = Woodard & Curran
EKI = EKI Environment & Water, Inc.	PD = Preliminary Design	TBD = to be determined	WSID = West Stanislaus Irrigation District
FS = Feasibility Study	PID = Patterson Irrigation District	TRID = Tranquillity Irrigation District	WY = Water Year
GSA = Groundwater Sustainability Agency	P&P = Provost & Pritchard	TWG = Technical Working Group	

Notes

- (a) Projects and Management Actions extend through 2025.
- (b) Portion of project is complete. Increased supply of recycled water expected.
- (c) Needs to be coordinated with Orestimba and Del Puerto Creek projects.
- (d) In operation starting in 2017.

Key Dates

- February 13, 2023: Subbasin Coordination Committee Meeting
- February 23, 2023: Northern & Central Delta-Mendota Management Committees Meeting
- March 21, 2023: Subbasin Coordination Committee Meeting
- March 21, 2023: Northern & Central Delta-Mendota Management Committees Meeting
- Late March 2023: Anticipated DWR Response on Amended GSPs
- April 1, 2023: WY 2022 Consolidated Annual Report Due to DWR**
- April 10, 2023: Subbasin Coordination Committee Meeting
- April 27, 2023: Northern & Central Delta-Mendota Management Committees Meeting
- May 9, 2023: Subbasin Coordination Committee Meeting
- May 25, 2023: Northern & Central Delta-Mendota Management Committees Meeting

Funding Opportunities – Updated 2/22/2023

Drought Relief Technical Assistance and Direct Producer Grants

The program designed to support small and medium scale California agricultural producers, or Socially Disadvantaged Farmers and Ranchers through technical assistance with business planning and marketing strategies. The program also includes direct producer grants for drought relief for those same priority groups. Applicants must be a non-profit, county dept. of ag., or RCD. Awards through CA. Dept. of Food and Ag. Of up to \$1.5 million. Deadline 3/16/23

Multibenefit Land Repurposing Program

This program will fund groundwater sustainability projects that reduce groundwater use, repurpose irrigated agricultural land, and provide wildlife habitat. Funding is intended to increase regional capacity to repurpose agricultural land to reduce reliance on groundwater while providing community health, economic wellbeing, water supply, habitat, and climate benefits. Four regional block grants of up to \$8.9 million each to a total of \$40 million available in Round 2. Department of Conservation. Deadline 3/29/23

Integrated Climate Adaptation and Resiliency Program Climate Adaptation Planning Grant

The program provides flexible funding to meet multi-sector/issue planning needs that intersect with climate risks, including but not limited to land use, transportation, housing, natural resource management, public infrastructure, and hazard mitigation issues. Funding from the Governor's Office of Planning and research. Maximum award ~\$650,000. Deadline 3/31/23

County-Wide and Regional Funding Program

Funding for regional programs that address drought-related and contamination issues for small water systems and domestic wells serving DACs. No deadline. Funding is from the State Water Board.

Restoration Grant Program

Multiple funding programs including wetland restoration, wildlife corridors, and addressing climate impacts. Project categories include: planning, implementation, acquisition, monitoring, and scientific studies. Applications accepted on rolling basis. Funding from CA Dept. of Fish and Wildlife.

Riparian Habitat Conservation Program

The Wildlife Conservation Board is accepting concept proposals for projects that provide meaningful and sustainable improvements to riparian habitats. \$3 Million available on a rolling basis.

Fertilizer Research and Education Program

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. CA Dept. of Food and Agriculture.