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TECHNICAL MEMORANDUM

DATE: March 20, 2023 Project No. 22-1-020

TO: Madera Subbasin GSAs

FROM: LSCE and DE

SUBJECT: Madera Subbasin Revised GSP – Interconnected Surface Water Draft Workplan

Introduction and Background

The relationship between the San Joaquin River (SJ River) and shallow groundwater along the southern boundary of the Madera Subbasin (Subbasin) is complex and data to characterize the groundwater-surface water relationship in this area of the Subbasin are limited. Implementation of the Interconnected Surface Water Workplan (Workplan) is expected to better characterize the following conditions:

- Shallow subsurface conditions,
- The relationship between streamflow and fluctuations of shallow groundwater levels, and
- The relationship between groundwater pumping and streamflow.

Shallow monitoring wells (typically less than 30 feet deep, although some extend to greater depths) installed in areas along the SJ River as part of the San Joaquin River Restoration Program (SJRRP) provide much of the existing monitoring information related to shallow groundwater adjacent to the SJ River. These wells were initially installed to monitor for potential increases in shallow groundwater levels west of the river due to increased reservoir releases to and flows in the SJ River as part of implementing the San Joaquin River Restoration Program (SJRRP). Monitoring of these wells has been inconsistent since 2018, and part of implementation of this work plan will involve reengagement with well owners to restart monitoring of these wells. Additional field data collection and technical analyses will be completed at depths greater than 30 feet to better characterize the shallow subsurface along the SJ River along the southern boundary of the Subbasin, which is likely to improve overall understanding of the relationship between groundwater in the upper 30 feet, the zone between 30 and 100 feet below ground surface (bgs), and the remaining portion of the Upper Aquifer below a depth of 100 feet where most groundwater pumping currently occurs.

This Workplan outlines potential plans and a related scope of work to compile and review existing data and reports pertaining to the study area, construct/install new monitoring facilities, collect additional field data, and conduct additional technical analyses. The purpose of this scope of work is to provide sufficient data and analyses to:

- Make a more informed determination of whether or not ISW is present along the SJ River at the southern boundary of the Subbasin;
- Improve understanding of the relationship between streamflow and fluctuations in shallow groundwater levels;
- Improve understanding of the relationship between shallow groundwater and regional groundwater pumping from deeper zones within the Upper Aquifer that may be separated from shallowest groundwater by intervening clay layers;
- Improve understanding of the relationship between streamflow and regional groundwater pumping; and
- Provide an improved basis for setting sustainable management criteria (SMC) if it is determined that interconnected surface water conditions exist.

Previous Work Summarized in GSP

As summarized in the Revised Groundwater Sustainability Plan (GSP) for the Subbasin, comparison of historical maps of unconfined groundwater elevations prepared by the Department of Water Resources (DWR) and the SJ River thalweg elevation indicated a connection between groundwater and surface water likely existed from 1958 (and likely before) through 1984. Subsequent data appeared to indicate groundwater elevations below (and disconnected from) the SJ River thalweg from 1989 to 2016. This analysis was based on contour maps of unconfined groundwater elevation prepared by DWR for the following years: Spring 1958, Spring 1962, Spring 1969, Spring 1970, Spring 1976, Spring 1984, Spring 1989 through Spring 2011 (see Revised GSP Appendix 2.E), Spring 2014 (Revised GSP Figure 2-48), and Spring 2016 (Revised GSP Figure 2-49).

Maps of depths to shallowest groundwater (including perched groundwater) for 2014 and 2016 are displayed on Revised GSP Figures 2-71 and 2-72. These maps incorporate very shallow monitoring wells (i.e., less than 50 feet deep), including SJRRP wells (many of which have well screens in the upper 30 feet). Depth to shallow groundwater maps were generated by contouring groundwater surface elevation and subtracting the contoured groundwater surface from the ground surface elevation as represented by the United States Geological Survey (USGS) National Elevation Dataset Digital Elevation Model. Some of the areas on the southern and southwestern boundaries of Madera Subbasin and along/adjacent to the San Joaquin River may be underlain by shallow clay layers that are above principal aquifers in the area. These clay layers impede the vertical movement of water within the shallowest part of the groundwater system and shallow groundwater in these areas can be considered perched/mounded as a result of the shallow clay layers, although there may be no unsaturated zone beneath them as exists in what is conventionally considered a perched groundwater condition. It is likely that seepage from the SJ River is the source of water combined with presence of shallow clay layers, which serves to maintain shallow groundwater levels at these locations. While groundwater levels in this perched zone appear to be approximately 10 to 30 feet below ground surface, water levels in the underlying regional groundwater system are typically much deeper, in excess of 50 feet below ground surface.

The SJRRP involves augmenting flow releases from Friant Dam with restoration flows. SJRRP restoration flows were initiated in October 2009 and referred to as “Interim” flows, while SJRRP “Restoration” flows were initiated in January 2014. The commencement of the SJRRP flows complicates the historical review and understanding of surface water – groundwater interaction and the potential effects (or lack thereof)

on surface water flow from groundwater pumping. A more detailed assessment of the timing and magnitude of SJRRP flow releases and relationships to shallow groundwater levels is something that should be taken into consideration.

Review of Revised GSP Figures 2-71 and 2-72 indicates that the SJ River was disconnected from the shallow perched/mounded groundwater during these time periods (Spring 2014 and Spring 2016). The 2014 and 2016 water years were considered Critical and Dry water years, respectively, according to the San Joaquin Valley Hydrologic Index (although water year 2016 was on the border of being classified as a Below Normal year). The relationship between stream seepage in the SJ River along the southern boundary of Subbasin and groundwater pumping along this portion of the SJ River within the Subbasin (i.e., within approximately 0.75 miles of the SJ River) is shown in Revised GSP Figure 2-73. The relationship between groundwater pumping from the Upper Aquifer withing five miles of the SJ River and stream seepage is shown in Revised GSP Figure 2-74. These figures suggest that at the highest end of the range of groundwater pumping (over 16,000 af/year in Revised GSP Figure 2-73 and over 200,000 AF/year in Revised GSP Figure 2-74), stream seepage increases with increased groundwater pumping. However, at the low to mid-range of groundwater pumping, the relationship is inconsistent. The highest amounts of groundwater pumping generally occur during drought periods when groundwater recharge is less, groundwater levels are lower, and groundwater would not be expected to be connected to the steam bed. In non-drought periods, when groundwater levels are higher and possibly connected to the streambed, there appears to be no strong relationship between groundwater pumping and stream seepage. This is supported by the relationship between streamflow entering the Subbasin at the upstream boundary of this river reach and stream seepage is shown in Revised GSP Figure 2-75. This figure indicates that stream seepage (i.e., infiltration) occurs during Critical, Dry, and Below Normal Years, and that the SJ River is a losing reach and likely not connected to groundwater at these times. During Above Normal and Wet Years, both stream seepage and groundwater discharge to streams occurs, indicating that the SJ River is connected to groundwater for some duration during these times. Additional evaluation of these relationships in the field and in the groundwater model will be conducted for the 2025 GSP Update.

Based on guidance received from DWR and because of limitations in available information to evaluate the interconnected nature of groundwater and surface water on the SJ River, for the Revised GSP it is assumed that conditions along the SJ River in the Subbasin constitute an ISW condition as defined by SGMA and under the GSP regulations. As a result, the Revised GSP established interim SMC for ISW until the shallow hydrogeologic conditions along the SJ River are more fully characterizing and a final determination regarding the presence/absence of ISW can be made.

In the Subbasin, an area identified as having a Groundwater Dependent Ecosystem (GDE) is located adjacent to the SJ River (see Revised GSP Figure 2-77). As noted above, the SJ River is in a net-losing condition and infiltrating surface water flows (stream seepage) likely contributes directly to the shallow groundwater system that supports the vegetation in the GDE unit (San Joaquin River GDE Unit). While it appears the source of shallow groundwater adjacent to the SJ River is stream seepage from the SJ River (when water is present) and shallow groundwater does not support surface water flows, there nevertheless is some potential for surface water flows and the shallow groundwater system supporting GDEs to be affected by regional pumping during certain times when shallow groundwater is present below the stream thalweg but within the root zone of GDEs. These GDEs/beneficial users include environmental

users such as riparian vegetation along the SJ River and the wildlife habitat and ecosystem functions it provides. The potential effects on the San Joaquin River Riparian GDE Unit are presented in Revised GSP Appendix 2.B.

As summarized above, the revised Madera Subbasin GSP established interim SMC for ISW based on DWR review/input received in the initial consultation letter. However, additional characterization of the relationship between groundwater and surface water along the SJ River is needed to provide an improved basis for making a final determination of the nature of the interconnection and appropriate SMC. Implementation of this Workplan is intended to provide additional field data and technical analyses as input to better characterizing ISW for the 2025 GSP Update (and beyond).

Proposed Scope of Work

The proposed scope of work involves seven main tasks including collection and analysis of existing data (beyond data compiled for the Revised GSP), installation of new monitoring facilities and collection of additional field data, completion of additional technical analyses, and completion of an updated assessment of presence/absence of ISW with recommendations for updated SMC (if necessary). The proposed scope of work is described in more detail below. It should be noted that implementation of the potential work set-forth herein is predicated on Groundwater Sustainability Agency (GSA) approval and allocation of the necessary funds as may be required (local funding and/or grants).

Task 1. Compile Additional Existing Data/Analyses (Supplemental to GSP)

This task includes several aspects involving compiling and reviewing of supplemental existing data for incorporation in analyses and characterization of conditions relating to ISW in the Subbasin. This task can be performed in coordination with similar efforts planned as part of implementation of the Subsidence Workplan proposed for the Subbasin.

Compile and Review Supplemental Existing Data

In this task, data collected during preparation of the Revised GSP will be supplemented with other newly available data related to ISW along the SJ River including:

- information presented in GSPs for other subbasins adjacent to the SJ River in the area, such as the GSP prepared by the North Kings GSA;
- new data available from specific local landowners or entities previously not available for incorporation into the Revised GSP;
- DWR Well Completion Reports (WCRs) for the area immediately adjacent to the SJ River (i.e., a zone extending approximately one mile on either side of the River along the southern boundary of Madera Subbasin);
- additional data compiled by USBR for the SJRRP for areas in the Subbasin;
- additional data from USGS and modeling information for their study of the SJ River;
- and other reports and data that may now be available.

The available data will be compiled and reviewed to inform subsequent field work (Task 2) and as input for technical analyses (Task 3).

AEM Data

Data from airborne electromagnetic (AEM) surveys conducted in Spring 2022 to support additional characterization of subsurface conditions in the Subbasin and surrounding areas are expected to be available in 2023. AEM data can provide helpful information on hydrogeologic conditions through measurements of the resistivity of subsurface materials. These surveys have the potential to improve the understanding of the configuration and composition of different subsurface materials. To the extent that AEM data was collected in the vicinity of the southern boundary of Subbasin along the SJ River, these data will be evaluated for their potential usefulness in helping to supplement the delineation of shallow stratigraphy along the portion of SJ River that forms a portion of the southern boundary of Subbasin. One potential application of AEM that is of particular interest related to potential interconnectedness of surface water is delineation of any shallow clay layers under and adjacent to the SJ River. A quality assurance/quality control (QA/QC) analysis of the data will be conducted by comparing AEM hydrostratigraphic interpretations to existing and new field data collected as described in this Workplan. Lithologic data from borehole logs along AEM section lines will be compared to evaluate if AEM interpretations are consistent with field data. If AEM data interpretations are found to be consistent and the resolution of shallow aquifer stratigraphy from AEM data interpretations is sufficient, the AEM data will be combined with field borehole lithologic data to develop refined hydrogeologic cross-sections along the SJ River (as described below in Task 3).

Task 2. Complete Additional Field Work

Enhancements to groundwater level and surface water monitoring facilities and activities, specifically along the SJ River, are important for improving the understanding of the relationships between groundwater levels and surface water in the Subbasin. Additional field work tasks fall into two categories: instrumentation of existing wells, and new monitoring facilities and field data collection.

Instrumentation of Existing Wells

The monitoring frequency in some of the Representative Monitoring Site (RMS) wells designated for the ISW minimum thresholds (MTs) and measurable objectives (MOs) in the Revised GSP presents some limitations for characterizing groundwater level fluctuations and development of appropriate SMC. The RMS wells related to ISW include MCE RMS-9, MCW RMS-5, MID RMS-14, and MID RMS-17 (**Figure 1**). These wells do not currently have continuous and automated groundwater level monitoring with pressure transducers. This task involves working with the owners of key RMS wells to prioritize and implement instrumentation of wells with transducers for collecting continuous groundwater data. As part of this task, if the assessment and monitoring of ISW would benefit from more continuous monitoring at other RMS well locations, other RMS wells could be considered and prioritized for automated monitoring. If further characterization and evaluation of ISW during implementation of this Workplan determines there are important benefits to continuous monitoring of other (non-ISW SMC) RMS wells, and arrangements can be made with the well owner(s), additional well instrumentation could be prioritized for implementation. It is assumed for purposes of estimating the cost of implementing the Workplan that two additional RMS wells will be selected for instrumentation.

New Monitoring Facilities and Field Data Collection.

Several key data gaps related to ISW in the Subbasin include coupled monitoring of groundwater levels at different depths within the Upper Aquifer (including very shallow groundwater and more regional groundwater zone) and stream conditions of stage, flow, and channel configuration at locations adjacent to the SJ River. Construction of new monitoring facilities and additional field data collection efforts are anticipated to focus on, but are not limited to: supplemental monitoring wells; stream stage and flow; stream elevation profile/thalweg profiles; and possible aquifer or well pump testing if cooperation can be obtained from landowners with wells at suitable locations near the SJ River. Potential field efforts are described in more detail below.

Install New Monitoring Wells

Monitoring wells are recommended for installation at four locations near the SJ River to augment existing groundwater level monitoring to understand dynamics between surface water conditions in the SJ River, groundwater conditions at very shallow depths where there is greater potential for interconnection between groundwater and surface water, and groundwater conditions in the regional groundwater system where groundwater is extracted by wells for irrigation and other uses. Three locations will target sites near existing SJRRP monitoring wells MCE RMS-9, MCW RMS-5, and MID RMS-17, which are approximately 30 feet deep; the new monitoring wells at these three locations will be screened slightly deeper in a coarse-grained zone between depths of 50 to 90 feet below ground surface (bgs). In addition, one new location will be selected for installation of a nested monitoring well: one screened in the upper 30 feet and one screened at depths between 50 and 90 feet. Preliminarily identified locations for potential new nested wells are shown in **Figure 1**, pending the outcome from review of additional data and evaluation of site suitability relating to access for construction and ongoing monitoring. Target well locations may also include consideration of proximity to existing production wells that might be used in evaluating shallow groundwater level responses to pumping from deeper zones.

The monitoring wells are planned to be drilled using the hollow-stem auger drilling method with split spoon core sediment samples collected every five feet. A lithologic log of the borehole will be prepared based on samples collected and under the supervision and guidance of a Professional Geologist, who will also provide recommendations regarding well construction details such as depth intervals for placement of well screen, filter pack, blank casing, and surface sanitary seal. Preliminarily, the new monitoring wells are planned to be constructed using 2-inch diameter Schedule 40 PVC materials, which will enable installation of automated groundwater level monitoring instrumentation and also provide access for groundwater quality sampling equipment. The new monitoring wells and existing RMS wells listed above will be surveyed to a consistent elevation datum to ensure there are no recent changes in groundwater surface or reference point elevations related to any recent subsidence that may have occurred in the area. Water quality samples will be collected from the new monitoring wells, and they will be outfitted with pressure transducers for ongoing automated collection of groundwater level data.

Install Stream Stage Recording Device(s)

Accurate assessment of dynamics related to surface water-groundwater interaction requires detailed information on river stage for relating to groundwater levels. There is currently a number of active stream

stage monitoring locations along the SJ River within the Madera Subbasin (**Figure 1**), including a number that are in close proximity to the sites preliminarily recommended for installation of additional monitoring wells. Installation of stream stage recorders are recommended at several additional locations corresponding to the locations of nested monitoring wells described in this Workplan (assuming permission/access can be obtained) and where existing stream gages are not sufficient for characterizing surface water conditions. Various options for instrumentation should be considered for these stage monitoring sites, but options include constructing the stream stage recorders from small-diameter (1- or 2-inch) PVC slotted pipe, which could be secured to the riverbank and extended into the low flow channel to enable the pipe to remain submerged during low-flow conditions and also provide access to monitoring instrumentation during higher flow conditions. A transducer would be installed in the PVC pipe for automated collection of river stage at all flow conditions. The river stage recorders will be coupled with a staff gage for periodic manual readings of stage to ensure accuracy of all data collected through automated instrumentation. The staff gage and stream stage recorder will be surveyed to the same elevation datum as the new monitoring wells.

Complete Stream Profile Surveys

Stream channel elevation profiles will improve characterization of the SJ River channel elevation and shape, which relates to potential for interconnectivity between surface water and groundwater when compared with groundwater levels. To better characterize the potential surface water-groundwater interconnectivity along the SJ River, stream channel elevation profiles perpendicular to the river channel orientation will be obtained at key locations through surveying, using the same elevation datum used for the monitoring wells and river stage recorders. The stream channel profiles will be conducted near each of the four new nested monitoring well locations and will extend perpendicularly from the new/existing monitoring well locations on the east side of the river and across the SJ River to the opposite riverbank (and possibly to any existing nearby monitoring wells on the west side of the river). The stream channel surveys should be conducted at a time of low flow (or no flow) in the river in an effort to accurately survey as much of the streambed as possible.

Complete Aquifer Testing

One of the key aspects related to ISW that is not well characterized in the areas along the SJ River includes understanding of how groundwater pumping from the regional aquifer may influence groundwater levels in the very shallow part of the groundwater system (and in turn surface water), especially in areas where the movement of water between the shallow part of the groundwater and the deeper regional groundwater system may be impeded to a great degree by the presence of clay layers. Aquifer testing conducted through pumping of existing production wells while monitoring conditions in the shallow part of the groundwater system and in the nearby SJ River would help understand the cross-communication between different depth zones of the groundwater system and potential communication between shallow groundwater and streamflow. One of the goals of the proposed aquifer testing is to evaluate how clay layers located between the top of the pumping well screen and bottom of the streambed do or do not impede a connection between groundwater pumping and streamflow. If cooperation can be obtained with one or more landowners having a suitable production well near the SJ River in Madera Subbasin, one or more pumping tests will be performed to evaluate pumping effects on shallow groundwater levels and

streamflow. A suitable production well for this testing would be screened in the Upper Aquifer at a location sufficiently close to the SJ River and to adjacent shallow monitoring wells to potentially have an effect on streamflow and shallow groundwater levels in close proximity to the River within the planned pumping duration (if there is a connection between groundwater and surface water). The timing of the test will also be important with considerations being given to performing the test at a time with higher shallow groundwater elevations (to maximize chances of having a connection between streamflow and shallow groundwater levels) while having a lower range of stream discharge (to maximize opportunity to see effects on streamflow).

If cooperation with existing production well owners cannot be obtained, consideration will be given to implementing "passive" aquifer testing. This type of testing would involve conducting continuous groundwater level monitoring in proximity to a production well to observe whether influences from normal pumping cycles can be discerned in nearby shallow groundwater and surface water. In this type of testing there will be no controlled/coordinated start and stop of pumping or attempts to maintain a consistent pumping rate, but rather the well would be operated in accordance with normal use without any coordinated pumping period.

Task 3. Technical Analyses

In coordination with and utilizing new information from compilation of additional available data and field work related to additional monitoring and characterization of surface and subsurface conditions related to the potential for interconnectivity between groundwater and surface water, technical analyses involving construction of detailed hydrogeologic cross sections along the SJ River, evaluation of fluctuations in shallow groundwater levels and river stage/flow, and evaluating relationships between groundwater pumping and streamflow are also planned to synthesize the available information and groundwater-surface water dynamics along the River.

Hydrogeologic cross-sections will be constructed using geologic/lithologic logs, geophysical logs, and AEM data relating to the stratigraphy within the Upper Aquifer, with particular focus on the upper 100 feet where there is potential for interconnectivity between groundwater and surface water. These cross-sections will include the most recent available data on groundwater levels, stream thalweg elevation (stream profiles conducted for this Workplan and available LiDAR data), and stream stage in conjunction with subsurface stratigraphy. The specific locations and orientation of the cross-sections will depend on where available data exist, including new data collected through Tasks 1 and 2, but are expected to include cross-sections oriented both parallel to and perpendicular to the SJ River. The perpendicular cross-sections will focus on locations aligned with new monitoring well locations.

Field data will be evaluated relative to the dynamic relationship between surface water and groundwater levels within the Upper Aquifer (in both the shallow and deeper zones of the Upper Aquifer). Available information indicates these dynamics vary over time and space depending on climatic/hydrologic conditions within a year (seasonal fluctuations) and from year to year (variations from wet years to dry years). Analyses presented in the Revised GSP based on the limited available historical data suggest that stream seepage (i.e., infiltration) occurs during Critical, Dry, and Below Normal Years, and that the SJ River is a losing reach and likely not connected to groundwater at these times. During Above Normal and Wet

Years, both stream seepage and groundwater discharge to streams occurs, indicating that the SJ River is connected to groundwater for some duration during these times.

These additional technical analyses will focus on providing further assessment of the surface water-groundwater dynamics along four key profiles perpendicular to the river (at new monitoring well locations) where the SJ River forms the boundary of Madera Subbasin to improve understanding of groundwater conditions in relation to surface water.

Task 4. Outreach

Implementation of the Workplan will involve outreach and coordination with key stakeholders and interested parties. A key outreach effort is needed to restart consistent monitoring of SJRRP wells along the SJ River selected as RMS wells in the GSP. Additional outreach efforts will focus on efforts related to the need and benefit from additional groundwater level or surface water monitoring and prioritization of efforts to expand monitoring. In particular, there will be outreach and coordination with the adjacent Kings Subbasin, which is expected to be performing similar efforts related to ISW. In addition, it is anticipated there will be outreach to various entities that are likely to have interest in Madera Subbasin efforts related to ISW, including National Marina Fisheries Service (NMFS), United States Bureau of Reclamation (USBR), and The Nature Conservancy (TNC). The various outreach efforts may also benefit considerations related to the feasibility of potential PMAs to achieve sustainability.

Task 5. Groundwater Modeling (in Conjunction with 5-Year GSP Update)

The groundwater model developed for the GSP (MCSim) will be updated and recalibrated as necessary as part of the 5-Year Update Report. This updated modeling will be used to further evaluate ISW conditions, both historically as well as current and expected future conditions, with the objective of characterizing groundwater-surface water interaction at a broader spatial scale within the southern part of the Subbasin. The groundwater model will be used to assist in evaluation of the potential for ISW to be present along the SJ River, and to further evaluate the potential for connection between regional groundwater pumping and surface water flows.

Pending the results from analyses conducted as part of Task 3 and the model update planned as part of the five-year update of the Revised GSP, it is anticipated that additional model scenarios may need to be developed to enable more detailed assessment of stream-aquifer interaction via model simulations of conditions and mechanisms across the entire Subbasin, especially the southern Subbasin. Potential additional model runs could include simulation of 50 years of future hydrology while varying the amount and distribution of groundwater pumping. Comparisons between such hypothetical model runs could be used to improve understanding of the influence of groundwater pumping in the Subbasin on shallow groundwater levels, stream flow/stage, and dynamics of connectivity between groundwater and surface water, including frequency, duration, and percent of time any interconnectivity occurs. A key aspect of additional groundwater model simulations will be to further evaluate the percentage of time connectivity between groundwater and surface water existed along the SJ River prior to 2015 compared to current and expected future conditions with implementation of projects and management actions (PMA) and the ongoing SJRRP. These analyses will directly support the evaluation and determination of appropriate SMC related to ISW (as described in the Revised GSP) under Task 5.

Task 6. Assessment of Presence of Interconnected Surface Water and Possible Revisions to SMC

The ultimate outcome from efforts conducted as part of this Workplan will be an assessment and establishment of appropriate SMC related to ISW as part of the five-year update of the Revised GSP. This will include potential refinements or modifications to interim SMC established in the Revised GSP, if determined appropriate. In conducting this assessment, the data and analyses developed through implementation of Tasks 1 through 4 of the Workplan will be used to evaluate whether ISW exists along the southern boundary of Madera Subbasin and if there is need to include SMC for ISW in the Revised GSP for the Madera Subbasin. An important consideration related to ISW and how and whether SMC are established for ISW is that once shallow aquifer groundwater levels fall to a point where they are disconnected from the river, additional declines in groundwater levels will no longer affect the rate and amount of stream infiltration/depletion. This fact, combined with the difference between historical and current/future SJ River flow releases from Friant Dam as part of the SJRRP, likely means that rate or amount of stream depletion are not appropriate metrics for defining ISW SMC, including undesirable results. Additionally, groundwater levels as a proxy for stream depletion is also not an appropriate SMC metric for two key reasons: 1) elevations of shallow groundwater levels below the threshold when groundwater and surface water become disconnected will not affect the rate/amount of stream depletion, and 2) historical shallow groundwater level data suggest that shallow groundwater levels have commonly been below the threshold when they become disconnected from surface water and such conditions are likely to continue to occur under future conditions. As described in the Revised GSP and used as an interim ISW SMC metric in the GSP, a potential SMC metric relating to the percent of time ISW occurs based on the occurrence during historical conditions (prior to 2015), likely provides the most appropriate ISW SMC metric for future management of groundwater in the Subbasin. However, because interconnectivity of surface water may only occur under limited hydrologic circumstances (i.e., brief periods wet water years) implementing this metric necessitates that ISW conditions be evaluated over an extended period of time (e.g., 5 years as currently used as part of the interim SMC or more) to ensure the SMC assessment period spans a representative range of climatic/hydrologic conditions.

Establishing final SMC for ISW for inclusion in the five-year update of the Revised GSP will draw upon the most recent data and technical analyses developed through implementation of this Workplan with consideration for the complexities of the dynamic relationship between groundwater and surface water along the SJ River in the Subbasin under conditions prior to and after initiation of the SJRRP.

Task 7. Prepare a Technical Memorandum or Report

A technical memorandum (TM) or report will be prepared to document all the tasks completed as part of implementation of the ISW Workplan. A Draft TM/Report will be submitted for review by the GSAs (and their technical representatives). Comments and suggested edits received from GSAs will be reviewed and incorporated as appropriate into a Final TM/Report. The Report will include documentation of all data compiled, field work completed, technical analyses performed, modeling results, and evaluation of the nature of groundwater – surface water interactions and recommended updates to SMC. In addition, the TM/Report will include a review and summary of any remaining data gaps and recommendations for future monitoring and assessment, as needed.

Schedule

The overall implementation of this Workplan is envisioned as a longer-term effort to develop important monitoring data and facilities for tracking and understanding groundwater conditions related to ISW in the Subbasin. Additional tasks are geared towards completion in time for incorporation into the first five-year update of the Revised GSP. However, some tasks described in the Workplan will likely extend beyond January 2025, including ongoing data collection. These longer-term tasks include field work involving installation of monitoring facilities, which should be phased with consideration of funding and cooperation from other entities needed to support these efforts. Implementation of the Workplan is planned to start in 2023 with commencement of the additional data review and compilation task. Similarly, field work is also planned to begin in 2023, primarily with well inventory survey efforts and review of opportunities to instrument existing wells. As a result, not all of the field work described in this Workplan is anticipated to be completed prior to January 2025 when the first five-year update of the Revised GSP is to be submitted. A general planned schedule for implementation of the Workplan is outlined below in **Table 1**.

Table 1. Summary of Proposed Schedule for Implementation of the Interconnected Surface Water Workplan

Task No.	Task Description	Task Completion Timeframe
1	Compile Additional Existing Data/Analyses (Supplemental to GSP)	Mid 2023 - Late 2023
2	Complete Additional Field Work	Late 2023 - 2026+ (field work may be phased depending on available funding)
3	Technical Analyses	Mid 2023 - Late 2024
4	Outreach	Early 2024 - Late 2024
5	Groundwater Modeling (in Conjunction with 5-Year GSP Update)	Early 2024 - Late 2024+
6	Assessment of Presence of Interconnected Surface Water and Possible Revisions to SMC	Late 2023 - Late 2024
7	Prepare a Technical Memorandum or Report	Mid 2024 - Late 2024 for interim deliverable; 2026+ for final deliverable

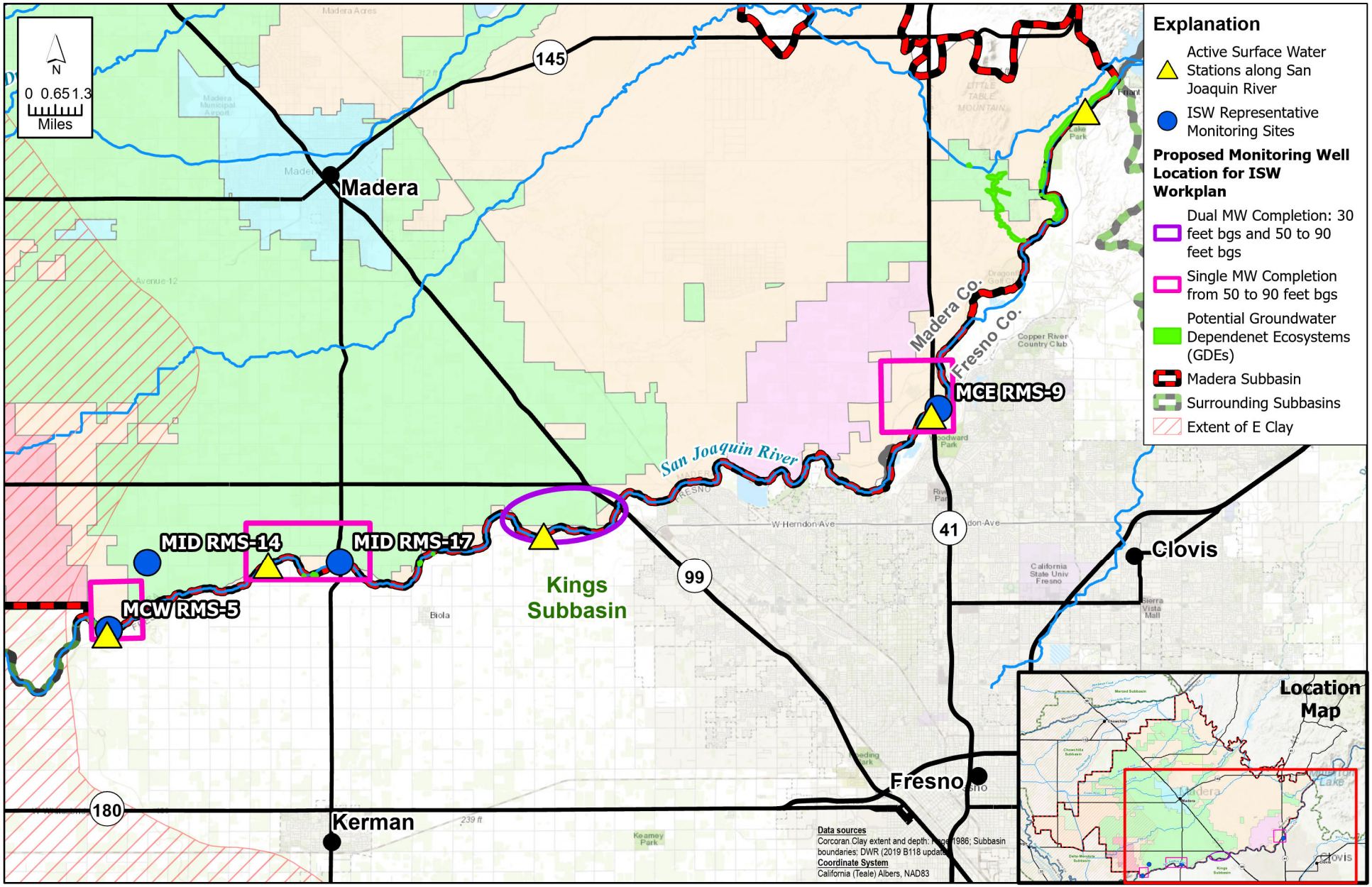

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FIGURE 1

DAVIDS ENGINEERING, INC

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Proposed Monitoring Well Locations for Interconnected Surface Water Workplan

Madera Subbasin
Groundwater Sustainability Plan