



ITEM 4.b

Action Item:

Consideration and recommendation to the Board of Directors to approve a Resolution adopting the Revised Delta-Mendota Subbasin Domestic Well Mitigation Policy.

- This proposed Resolution and Policy is consistent with the authority granted under the Sustainable Groundwater Management Act (SGMA), and is exempt from CEQA under Guidelines sections 15307, 15308, and 15061(b)(3).



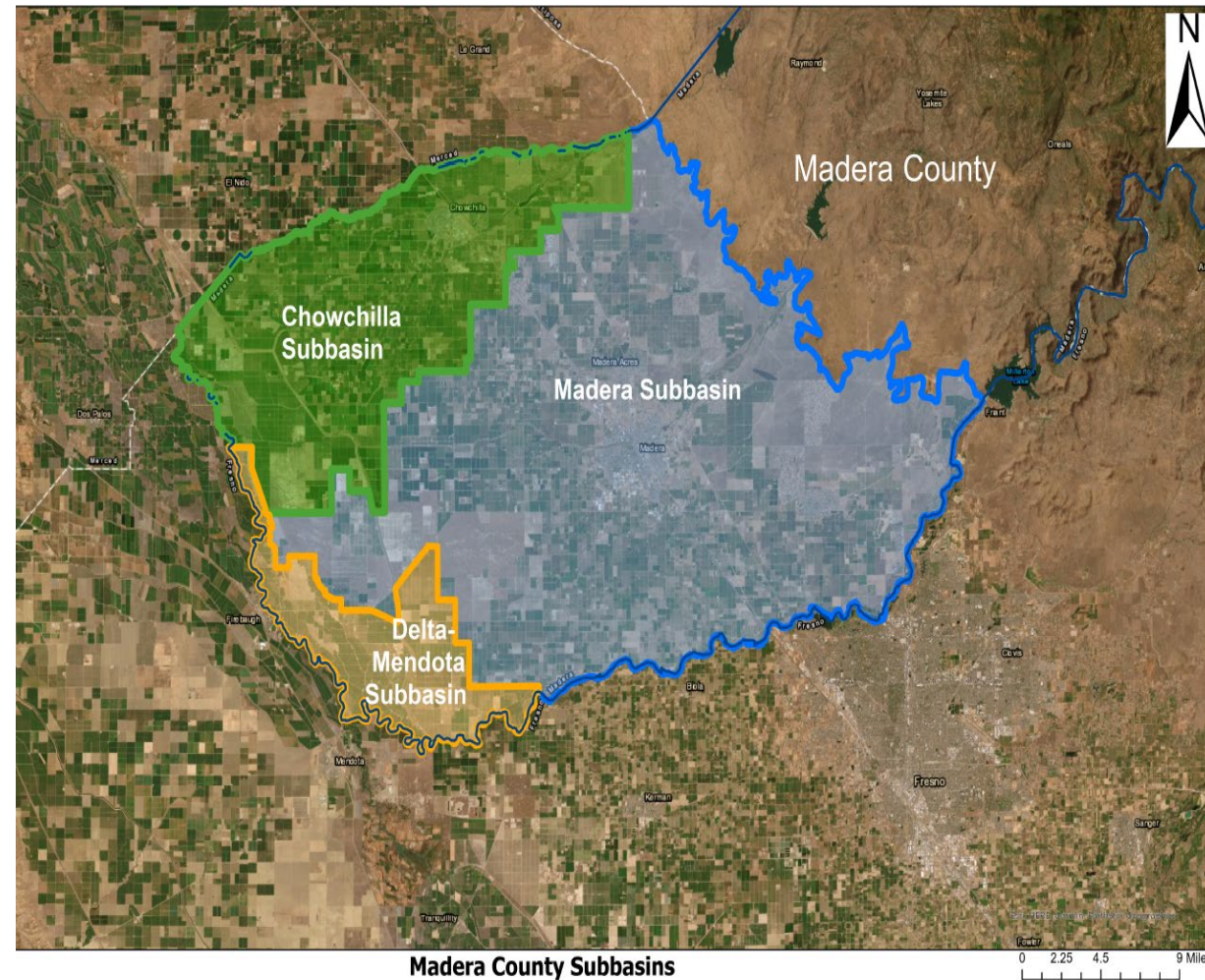
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Delta-Mendota Background

- Madera County Delta-Mendota GSA, covers portions of the subbasin not already covered by another GSA, 2017
- Subbasin is comprised of 23 GSAs
- 23 GSAs make up 7 GSA Groups
- 7 GSA Groups form the Coordination Committee
- Coordination Committee created and implemented the 2024 subbasin wide Groundwater Sustainability Plan (GSP)



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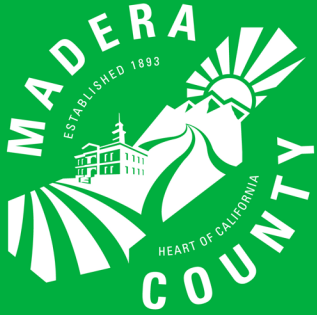
Delta-Mendota Domestic Well Mitigation Policy

- Original Delta-Mendota Well Mitigation Policy was adopted as part of subbasin wide 2024 GSP
- The 2024 GSP is currently under review by the State Water Resources Control Board (SWRCB) due to the Department of Water Resources (DWR) inadequate determination of the prior submitted GSPs
- Domestic Well Mitigation is a priority to avoid SWRCB probation
- Under the direction of SWRCB staff, the Coordination Committee has adopted a revised Domestic Well Mitigation Policy
- To aid in the return of the Delta–Mendota Subbasin back to the Department of Water Resources jurisdiction, the Coordination Committee has requested all 23 GSAs to adopt the revised Policy



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Revised Delta-Mendota Domestic Well Mitigation Policy

- Shorten response times for emergency water supplies
 - Reasonable efforts to provide short-term emergency water supply within 24 hours of receipt of completed application and provide tanked water within 72 hours, in cooperation with Valley Water Collaborative, Self-Help Enterprises, and other similar entities
- Identify conditions for water quality domestic well mitigation
 - Project or Management Action causes water quality degradation beyond Minimum Thresholds (MTs) for the 6 constituents of concern
 - Groundwater levels decline below 2015 MTs and cause water quality degradation beyond water quality MTs
- Avoid water quality degradation by continuous monitoring and enforcing Pumping Reduction Plans to ensure 2015 MTs are not surpassed
- Include permanent solutions for fixing GSA caused water quality issues
 - Reverse osmosis system and up to three years of filter replacements, not to exceed a cost of \$2,500



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Domestic Wells in County of Madera GSA- Delta-Mendota

- Currently, no domestic wells are located within the boundaries
- Currently, no funding source for domestic well mitigation



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Staff Recommendation

Consideration and recommendation to the Board of Directors to approve a Resolution adopting the Revised Delta-Mendota Subbasin Domestic Well Mitigation Policy.



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ITEM 4.c

Action Item:

Consideration and recommendation to the Board of Directors to approve Transfer of Appropriations No. 25-021 in the amount of \$100,700 transferring funds from the Appropriation for Contingency account to the Refunds and Reimbursements account to authorize payment to the Chowchilla Water District for allocation exceedance penalties collected in the Chowchilla Subbasin.



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Purpose of Transfer

- Under Resolution 2022-143 and Madera County Contract No 12652-13, the Madera County GSAs were assigned to collect Allocation Exceedance Penalties and transfer the Penalties to the Chowchilla Water District (CWD)
- Penalties go towards Domestic Well Mitigation in the Chowchilla Subbasin
- CWD manages the Domestic Well Mitigation Program in the Chowchilla Subbasin.



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2024 Allocation Penalties – Chowchilla Subbasin

- In 2024, Madera County GSA billed \$274,420 in penalties
- Collected \$100,700 in direct payments
- Uncollected amount of \$173,720 will be collected on property tax bills
- \$100,700 needs to be transferred to CWD

Subbasin	2023 Penalties (\$)	2024 Penalties (\$)
Chowchilla Subbasin	\$15,000	\$100,700



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Process of Transfer

Refunds and Reimbursement account in the GSA Adm. Fee Budget is used to transfer penalties to CWD

TOA No. 25-021 moves \$100,700 from:

Appropriation for Contingency → Refunds & Reimbursements

Payment to CWD can then occur



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Staff Recommendation

Consideration and recommendation to the Board of Directors to approve Transfer of Appropriations No. 25-021 in the amount of \$100,700 transferring funds from the Appropriation for Contingency account to the Refunds and Reimbursements account to authorize payment to the Chowchilla Water District for allocation exceedance penalties collected in the Chowchilla Subbasin.



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ITEM 4.d

Action Item:

Consideration and recommendation to the Board of Directors to approve a Resolution adopting a Policy for Allocation of Carryover Credits and Penalties During Farm Unit Reorganization

- This proposed Resolution and Policy is consistent with the authority granted under the Sustainable Groundwater Management Act (SGMA), and is exempt from CEQA under Guidelines sections 15307, 15308, and 15061(b)(3).



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Proposed Policy Summary

- At calendar year's end, the County GSA can allocate your carryover or penalties based on a
 - Sales agreement; or
 - Lease agreement; or
 - Other written agreement; or
 - Automatically default to Volumetric apportionment



Proposed Policy: When would it apply?

- At year's end for apportionment of carryover and penalties and/or
- At year's end when the farm unit is reorganized
- Changes are only processed at the year's end



Things to consider

- Volumetric apportionment is already in practice. This is automatically done annually for accounts with carryover/penalties
- Very few farm units reorganize at the year-end
- Proposed policy provides growers the flexibility to distribute credits/penalties in a non-volumetric way using a contract



Carryover and Penalty Apportionment to the Parcel Scale



Reasons for Parcel Apportionment

- Why penalties and carryover need to be apportioned at the parcel level:
 - Farm units can change from year to year and are therefore not a durable entity that either penalties or carryover can be practically associated with
 - Penalty collection may necessitate liens on land ownership (i.e., parcels)
- Primary challenge: penalties and carryover water are computed (or aggregated) at a farm unit level but need to be apportioned to the parcel level.



How are penalties and carryover apportioned to the parcel level?

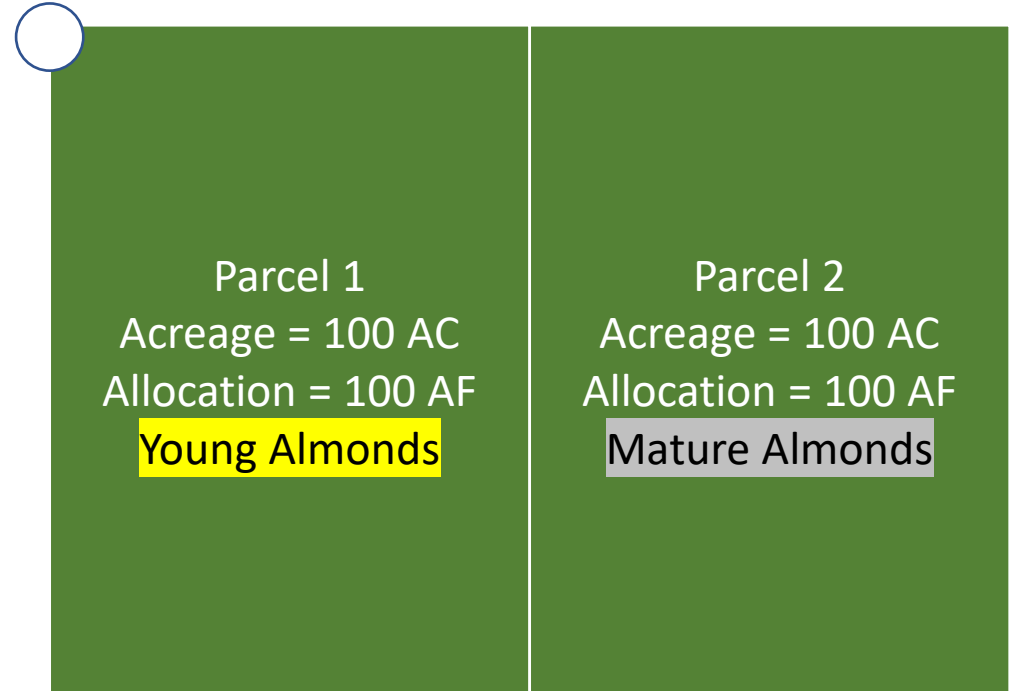
- Each parcel in a farm unit can have a:
 - **Positive Remaining** (parcel allocation was greater than parcel ETAW)
 - **Negative Remaining** (parcel allocation was less than parcel ETAW)
- Similarly, the Farm Unit can be either in carryover or in penalty

Scenario	Parcel 1 Remaining	Parcel 2 Remaining	Farm Unit Net Remaining
1	Negative	Negative	Negative (Penalty)
2	Positive	Positive	Positive (Carryover)
3	Positive	Negative	Positive (Carryover)
4	Positive	Negative	Negative (Penalty)



Two-parcel farm unit

- Both parcels within same Farm Unit
- Each 100 Acres (AC)
- Allocation of 100 Acre Feet (AF) per parcel



Scenario 1:

All parcels have negative remaining
Farm Unit in penalty

Parcel 1 Remaining	Parcel 2 Remaining	Farm Unit Remaining
Negative	Negative	Negative (Penalty)





Scenario 1: All parcels in penalty; Farm Unit in penalty

Farm Unit level

Gross Carryover = 0 AF

Gross Penalty = -50 + -100 = -150 AF

Net Remaining = Gross Carryover + Gross Penalty
= 0 + -150 = -150 AF*

*Farm Unit is in penalty

Parcel 1

Acreage = 100 AC
Young Almonds
Allocation = 100 AF
ETAW = 150 AF
Remain = -50 AF

Parcel 2

Acreage = 100 AC
Mature Almonds
Allocation = 100 AF
ETAW = 200 AF
Remain = -100 AF



Scenario 1: All parcels in penalty; Farm Unit in penalty

Parcel level

Parcel	Remaining	Acreage	Apportionment (based on volumes)
1	-50	100	-50
2	-100	100	-100

Farm Unit

Total Acreage = 200 AC
Gross Carryover = 0 AF
Gross Penalty = -150 AF
Net Remaining = **-150 AF** (Penalty)

Parcel 2 example: $\text{Farm Unit Net Remaining} * \frac{(\text{Parcel Remaining} < 0 \text{ AF})}{\text{Farm Unit Gross Penalty}}$

$$-150 \text{ AF (Penalty)} * \frac{(-100 \text{ AF})}{-150 \text{ AF}} = -100 \text{ AF}$$

Scenario 2:

All parcels have positive remaining
Farm Unit in carryover

Parcel 1 Remaining	Parcel 2 Remaining	Farm Unit Remaining
Positive	Positive	Positive (Carryover)





Scenario 2: All parcels have positive remaining; Farm Unit in carryover

Farm Unit level

Gross Carryover = 75 + 25 = 100 AF

Gross Penalty = 0 AF

Net Remaining = Gross Carryover + Gross Penalty
= 100 + 0 = 100 AF*

*Farm Unit is in carryover



Parcel 1

Acreage = 100 AC
Young Almonds
Allocation = 100 AF
ETAW = 25 AF
Remain = 75 AF

Parcel 2

Acreage = 100 AC
Mature Almonds
Allocation = 100 AF
ETAW = 75 AF
Remain = 25 AF



Scenario 2: All parcels have positive remaining; Farm Unit in carryover

Parcel level

Parcel	Remaining	Acreage	Apportionment (based on volumes)
1	75	100	75
2	25	100	25

Farm Unit
Total Acreage = 200 AC
Gross Carryover = 100 AF
Gross Penalty = 0 AF
Net Remaining = **100 AF** (Carryover)

Parcel 1 example:
$$\text{Farm Unit Net Remaining} * \frac{(\text{Parcel Remaining} > 0 \text{ AF})}{\text{Farm Unit Gross Carryover}}$$
$$100 \text{ AF (Carryover)} * \frac{(75 \text{ AF})}{100 \text{ AF}} = 75 \text{ AF}$$

Scenario 3:

One parcel has positive remaining and one parcel has negative remaining
Farm Unit in carryover

Parcel 1 Remaining	Parcel 2 Remaining	Farm Unit Remaining
Positive	Negative	Positive (Carryover)





Scenario 3: One parcel positive remaining and one parcel negative remaining; Farm Unit in carryover

Farm Unit level

Gross Carryover = 75 AF

Gross Penalty = -50 AF

Net Remaining = Gross Carryover + Gross Penalty
= 75 + -50 = 25 AF*

*Farm Unit is in carryover

Parcel 1
Acreage = 100 AC
Young Almonds
Allocation = 100 AF
ETAW = 25 AF
Remain = 75 AF

Parcel 2
Acreage = 100 AC
Mature Almonds
Allocation = 100 AF
ETAW = 150 AF
Remain = -50 AF



Scenario 3: One parcel positive remaining and one parcel negative remaining; Farm Unit in carryover

Parcel level

Parcel	Remaining	Acreage	Apportionment (based on volumes)
1	75	100	25
2	-50	100	0

Farm Unit
Total Acreage = 200 AC
Gross Carryover = 75 AF
Gross Penalty = -50 AF
Net Remaining = **25 AF** (Carryover)

Parcel 1 example: $\text{Farm Unit Net Remaining} * \frac{(\text{Parcel Remaining} > 0 \text{ AF})}{\text{Farm Unit Gross Carryover}}$

$$25 \text{ AF (Carryover)} * \frac{(75 \text{ AF})}{75 \text{ AF}} = 25 \text{ AF}$$

Scenario 4:

One parcel has positive remaining and one parcel has negative remaining
Farm Unit in penalty

Parcel 1 Remaining	Parcel 2 Remaining	Farm Unit Remaining
Positive	Negative	Negative (Penalty)





Scenario 4: One parcel positive remaining and one parcel negative remaining; Farm Unit in penalty

Farm Unit level

Gross Carryover = 75 AF

Gross Penalty = -100 AF

Net Remaining = Gross Carryover + Gross Penalty
= 75 + -100 = -25 AF*

*Farm Unit is in penalty

Parcel 1
Acreage = 100 AC
Young Almonds
Allocation = 100 AF
ETAW = 25 AF
Remain = 75 AF

Parcel 2
Acreage = 100 AC
Mature Almonds
Allocation = 100 AF
ETAW = 200 AF
Remain = -100 AF



Scenario 4: One parcel positive remaining and one parcel negative remaining; Farm Unit in penalty

Parcel level

Parcel	Remaining	Acreage	Apportionment (based on volumes)
1	75	100	0
2	-100	100	-25

Farm Unit
Total Acreage = 200 AC
Gross Carryover = 75 AF
Gross Penalty = -100 AF
Net Remaining = **-25 AF** (Penalty)

Parcel 2 example: $\text{Farm Unit Net Remaining} * \frac{(\text{Parcel Remaining} < 0 \text{ AF})}{\text{Farm Unit Gross Penalty}}$

$$\text{-25 AF (Penalty)} * \frac{(-100 \text{ AF})}{-100 \text{ AF}} = -25 \text{ AF}$$

Staff Recommendation

Consideration and recommendation to the Board of Directors to approve a Resolution adopting a Policy for Allocation of Carryover Credits and Penalties During Farm Unit Reorganization





Definitions

Parcel - Delineations (*i.e.*, boundaries) of land ownership from the Madera County Assessor's Office.

Farm Unit - Aggregation (*i.e.*, grouping) of parcels farmed or managed by a single entity within each Farm Unit Zone (e.g., Madera Subbasin Madera County GSA East – Southern)

Total Parcel Allocation (AF) - Parcel Allocation + Parcel Carryover + Parcel Adjustments (if any)

Farm Unit Gross Carryover (AF) - Sum of all Parcel Carryover within the Farm Unit (positive)

Farm Unit Gross Penalty (AF) - Sum of all Parcel Penalty within the Farm Unit (negative)

Farm Unit Net Remaining (AF) - Farm Unit Gross Carryover + Farm Unit Gross Penalty (positive if carryover; negative if penalty)



ITEM 4.e

Informational Item:

Dauids Engineering Contract with Chowchilla Water District for Demand Management and Subsidence Mitigation in the Chowchilla Subbasin



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Proposed Contract Overview

Contract: Groundwater Demand Management (GDM) and Subsidence Mitigation Measures Support

Where: Chowchilla Subbasin

Who: Chowchilla Water District GSA

Vendor: Davids Engineering Inc. (DE)

Timeline: September 2025 – June 2026

Scope: Support the Chowchilla Subbasin GSAs with planning and decision-making to establish GDM programs and subsidence mitigation measures

Total Cost: \$193,400 (shared proportionally)



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Why is this contract needed?

- State Water Resources Control Board (SWRCB) indicated that all Chowchilla Subbasin GSAs must prepare demand management programs and subsidence mitigation measures with specific triggers
- MOU was adopted with the 2025 Revised Chowchilla Subbasin GSP
- The scope within this contract will support development of the GDM program and subsidence mitigation measures ensuring they are ready for implementation in 2026, consistent with commitments in the 2025 Revised GSP
- Only to be implemented if necessary



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Scope of Services

- **Task 1: Support Development of Groundwater Demand Management (GDM) Programs and Subsidence Mitigation Measures - \$138,000**
 - DE team will support the GSAs with development of GDM consistent with commitments in the MOU
- **Task 2: Facilitate Technical Coordination Meetings - \$20,000**
 - Remote meetings between the DE team and the GSAs to present updates, raise technical considerations, and solicit feedback on project development topics
- **Task 3: Facilitate Public Workshops and GSA Meetings - \$35,400**
 - DE team will support the GSAs in holding public workshops and GSA meetings



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Estimated Contribution by GSA

	Acres	Percent	Cost by % Contribution
CWD GSA	85200	58.24%	\$ 112,629.39
Madera County GSA	45100	30.83%	\$ 59,619.55
TTWD GSA	14700	10.05%	\$ 19,432.54
Merced County GSA	1300	0.89%	\$ 1,718.52
Total Acres	146300	Total Cost	\$ 193,400.00

TTWD received permission from DWR to move \$33,000 from an existing grant to help offset costs



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Informational Item Only

- This item does not require a staff recommendation or a vote
- MOU required by SWRCB
- Madera County GSAs already have a demand management program in place
- This contract will assist the other GSAs in the Chowchilla Subbasin to develop demand management programs and subsidence mitigation measures



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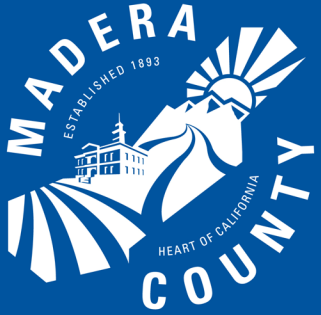
Informational Item:

Fiscal Year 2024-2025 Financial Analysis Update



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County GSA Financial Update

Outline

- GSA Admin Fee
- Rate Study Key Concepts
- Trends Over Time
- Potential Cost Saving Measures



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County GSA Overview

220,000 acres across 3 subbasins

- 120,000 irrigated acres
- 100,000 rangeland (never irrigated)

Responsibilities

- Develop & update GSPs
- Annual reports & monitoring wells
- Grant Management

Programs

- Demand Reduction – three options to track water use
- Land Repurposing – supported by grants
- Recharge Projects – multiple grant-funded efforts
- Domestic Well Mitigation – development and services
- Outreach & Education – SGMA rules & grower guidance



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County GSA Fee Key Concepts

County GSA Fee – limited to administration, planning, and regulatory compliance (not projects)

2019 Rate Study Categories:

- Regulatory Compliance
- Professional Services
- Staffing
- Administrative Expenses

Reserve Requirement – 10% “prudent reserve” + \$160,000 for GSPs/year



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FY 24-25 Financial Analysis of County GSA

Major Revenue Categories:

- Grant revenue
- Interfund revenue (Flood, Drought, other GSAs Reimbursements)
- GSA Admin Fee, penalties and interest

Major Expenditure Categories:

- Regulatory Compliance
- Professional Support Services
 - ✓ Land Repurposing (SALC, LandFlex, Multi-Benefit)
 - ✓ Financial
 - ✓ Legal
 - ✓ Recharge
 - ✓ Miscellaneous
- Staffing
- Administrative Expenses



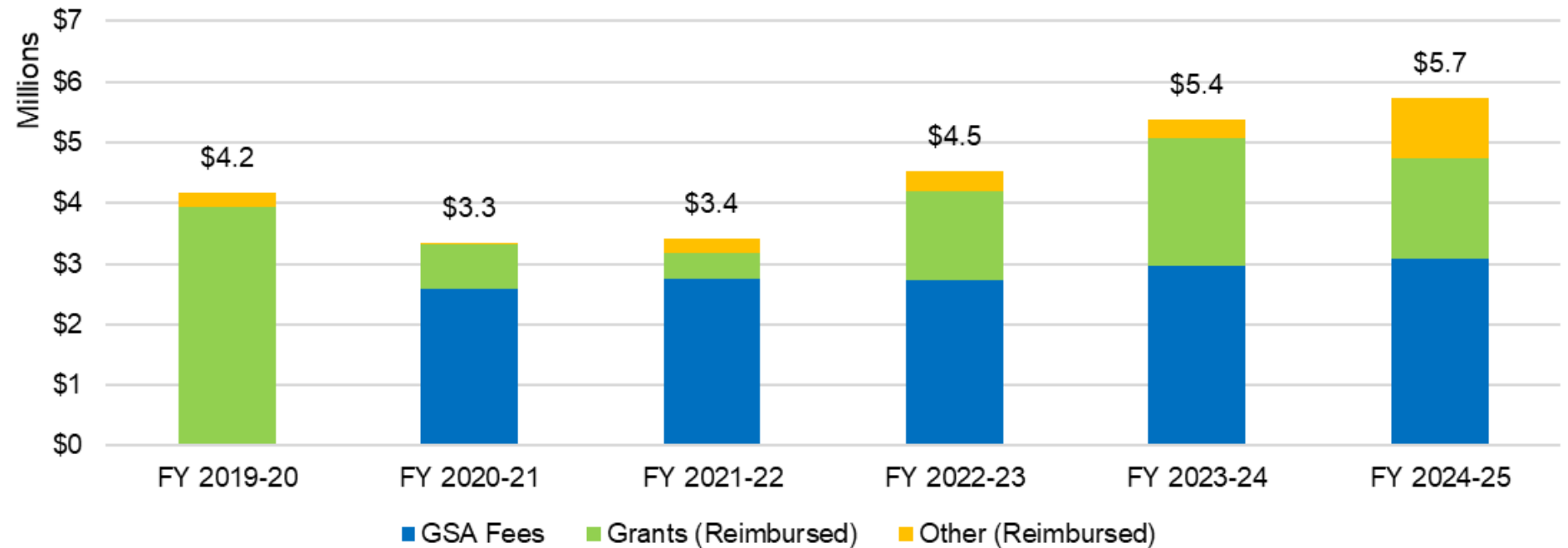
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GSA Revenue Summary

GSA Revenue Summary

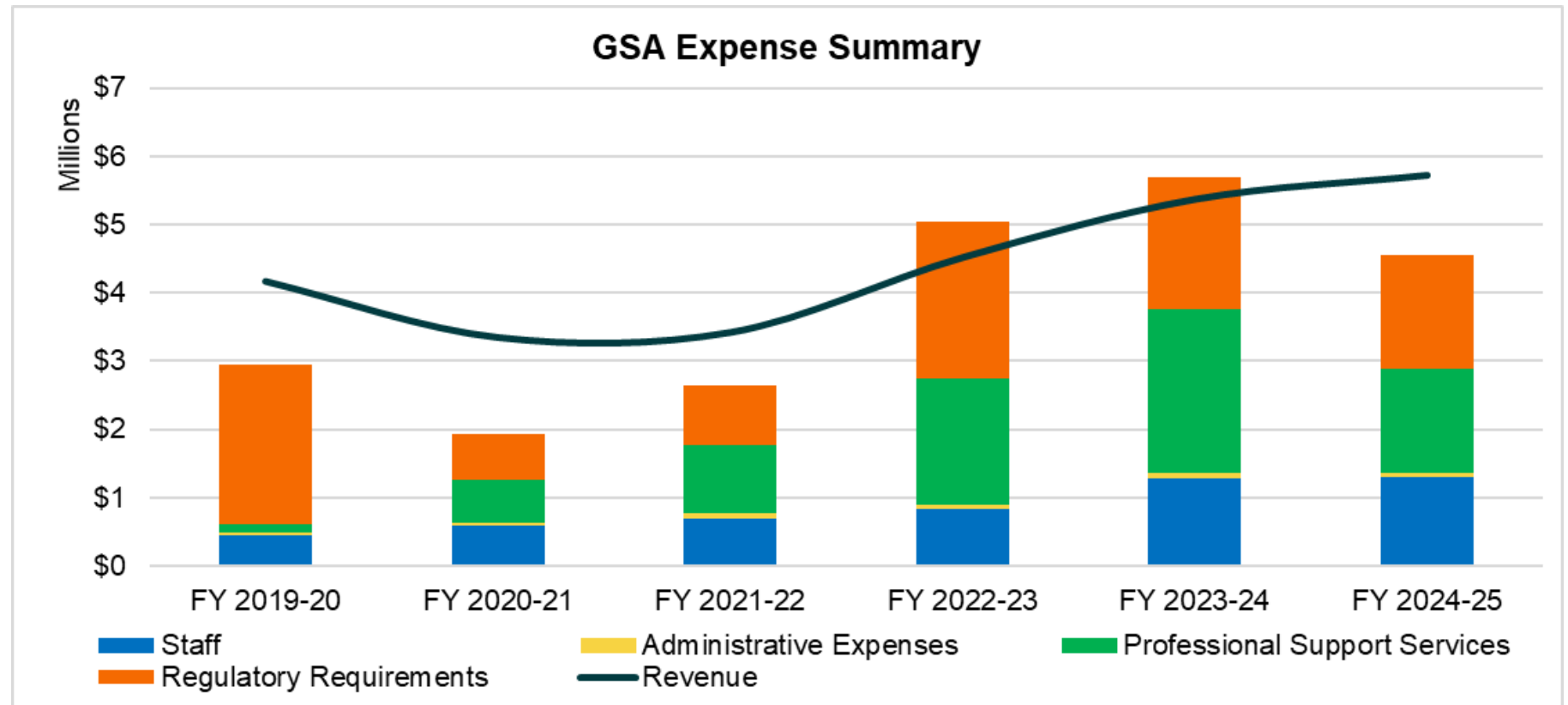


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GSA Expenses Summary

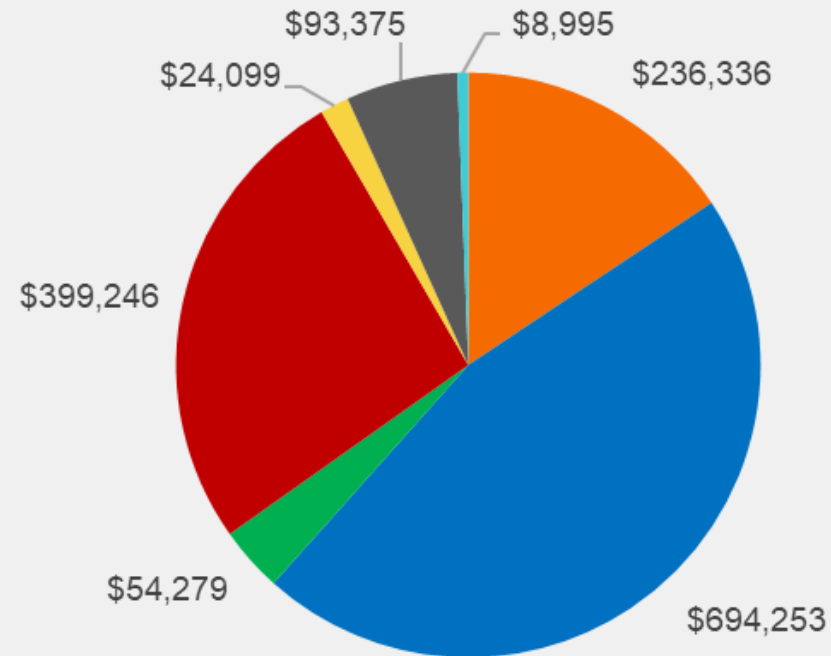


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GSA Expenses – Professional Support Services (FY 2024-2025)



- Legal
- Financial
- Misc
- Multi-Bend Lnd Payments (Grant Funded)
- Land Repurposing (Grant Funded)
- Recharge (Grant Funded)
- Land Flex - Land Payments (Grant Funded)

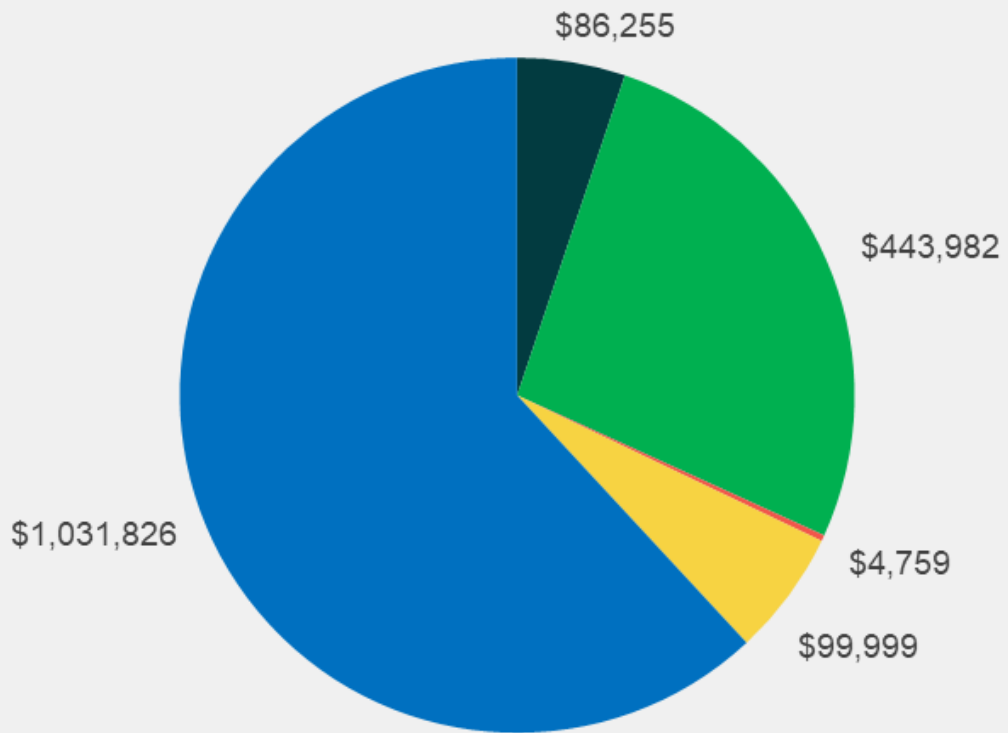


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GSA Expenses – Regulatory Requirements (FY 2024/2025)



- GSP Annual Reports
- GSP Development
- Other
- Data Management Systems
- Wells
- Demand Management



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Financial Observations

- Grants have temporarily expanded capacity for projects, programs, and planning
- Grants are not a sustainable long-term funding source and current state grant funding is limited
- Technical expertise is costly
- Litigation should be anticipated
- Three measurement options reflect grower input



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Current Cost Saving Measures

In-House services:

- Field verification and financial analysis
- Program translation and outreach coordination
- Grant administration and legislative tracking

Note: No Verification Project in 2025 based on grower feedback



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Anticipated Costs

- Chowchilla GSP Amendment
- Delta-Mendota GSP Revisions
- Gaps in Recharge grant funding
- Augmenting Well Monitoring Network
- Land Repurposing Monitoring
- Future interpretation services to support outreach efforts beyond in-house capacity
- Potential Groundwater Accounting Platform



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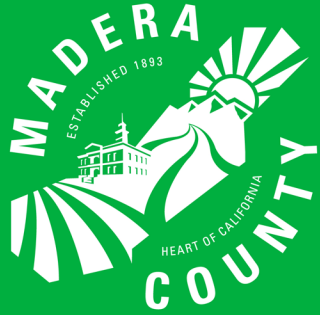
Informational Item:

Domestic Well Mitigation in the Madera Subbasin



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Timeline

January 2020 – Joint GSP in the Madera Subbasin includes outline of domestic well mitigation program and comparable programs

March 2023 - Madera County Groundwater Sustainability Agency (Madera County GSA) and four other parties signed a Memorandum of Understanding in March 2023 outlining a domestic well mitigation program based on proportional cost sharing based on historical and future contribution to overdraft.

January 2025 – Facilitation through an SB 552 grant began on a framework for domestic well mitigation

August 2025 - A number of parties elected to cover their own geographic area (within their groundwater sustainability agency). As a result, the Madera County GSA must work alone to fund the area within its boundaries.



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Madera Subbasin Framework

- Subbasin Eligibility: Wells eligible for mitigation must be located within the legal boundaries of the Madera Subbasin
- Mitigation Eligibility: Wells eligible for mitigation must be domestic wells
- Mitigation Costs: Mitigation of a well will have a maximum reimbursement of \$35,000 for the cost of drilling a new well only.
- Mitigation Frequency: Wells found eligible will be mitigated once and will be recorded against the parcel.
- Mitigation Provider: Eligible mitigation will be provided by the respective GSA in which the well is located.
- Public Disclosure: The domestic well mitigation information will be included in the Annual Reports.
- Public Outreach: The GSAs in the Subbasin agree to coordinated and consistent public outreach, to the extent possible, regarding domestic well mitigation in the Subbasin.



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Domestic Well Mitigation Program Comparison

	Madera Subbasin	Chowchilla Subbasin	Delta-Mendota Subbasin
Funds cost of well	35K (well only)	30K (well only)	Up to GSA; no cap in program
Funds domestic Wells	Yes	Yes	Yes
Funds Small Systems	No	Yes	Yes
Funds Shallow Ag Wells	No	No	Potentially
Funds emergency supply of water delivery	No	Yes	Yes
Funds temporary water quality mitigation	No	Yes	Yes; capped at \$2500
Funds permanent water quality mitigation	No	Yes in conjunction with Nitrate Management	Yes; capped at \$2500
Funds cost of old well destruction	No	No	Yes



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Draft Program Rules



Draft Program Rules

- Based on Chowchilla Subbasin (relatively simple!)
- Eligible if a landowner with a domestic well in the Madera Subbasin, County GSA and well has gone dry to agricultural overpumping (or collapsed due to subsidence)
- Process includes:
 - Application by landowner with refundable payment of \$100
 - Review of application by Madera County GSA Program Manager
 - Initial assessment done by Madera County GSA
 - New well could be drilled with maximum payment of \$35,000
 - Any costs over \$35,000 must be covered by landowner.
 - Eligible to participate one time
 - Participation recorded on deed



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Draft Program Application

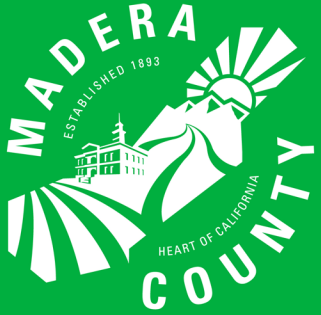
- Based on Chowchilla Subbasin Program
- Two pages total (could be on-line as well as paper)
- Asks for landowner and property information
- Asks for well information



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Draft RFQ



- California Contractor with a C-57 license in good standing with the California Contractors State Licensing Board
- Over 5 years providing domestic well installation services
- Knowledgeable of hydrogeologic conditions (static and pumping water levels, groundwater level trends) within the Madera Subbasin
- Experience with domestic water well design, drilling, and construction
- Successful completion of 25 domestic wells in the last 5-years in and in the vicinity of the Madera Subbasin
- Ability to respond to requests in a timely manner



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Draft Proposal for Program Manager

Task 1

- DE will conduct a preliminary completeness review of the application to determine DWMP eligibility.
- DE will implement a technical review of applicants' existing domestic well.
- DE will perform field inspections of domestic wells to determine whether applicants are eligible for mitigation (cause of well failure).
- Following appropriate due-diligence and analysis, DE will determine whether the domestic well meets the eligibility criteria and make a recommendation to the Madera County – Madera GSA for mitigation.
- Coordinate new well construction with the applicable driller(s). Inclusive of the bidding process, as may be required.
- Coordinate with applicable permitting agencies.
- Coordinate final inspection, inclusive of the well completion report.
- Coordinate abandonment of the existing well.
- Coordinate filing of the well completion report, as applicable.
- Continuous landowner coordination and communication during the application and mitigation process.
- Recordation of mitigation on deed.
- Complete and provide quarterly reports to the Madera County – Madera GSA.



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Draft Proposal for Program Manager

Task 2

- Preparation of DWMP related documentation for website publication, website creation, and completion of website maintenance, as necessary and as requested.
- Make public presentations and facilitate workshops to review important DWMP topics, solicit feedback from the public, and guide next steps for implementation of the Madera County –Madera GSA DWMP.
- Attend public health events for continued outreach and implementation of the DWMP, as requested and/or required.



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Draft Proposal for Program Manager

Task 3

Summary of implementation actions taken during the year.

- o Number of applications received, reviewed, approved, and denied.

- o Spatial representation of wells approved for mitigation.

- o Technical summary for each new well drilled.

Summary of annual public outreach.

Summary and description of any implementation hurdles.

Complete and transparent summary of DWMP revenue and expenditures.

Forecasted implementation costs for the coming year.

Task 4

On call



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Draft Documents

Staff is seeking feedback on the following documents:

Draft Framework

- Worked on with other GSAs with grant funds

Draft Program Rules

- based on Chowchilla Subbasin (simple!)

Draft Program Application

- based on Chowchilla Subbasin (simple!)

Draft Driller RFQ

- Requires five years experience and includes local preference

Draft Program Manager Scope Proposal

- Does not require hiring staff
- Administration would be conducted by program manager



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ITEM 4.h

Informational Item:
Measurement Methods Distribution and Costs



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Follow Up Requests

- Distribution of Measurement Choices
- Costs of Measurement



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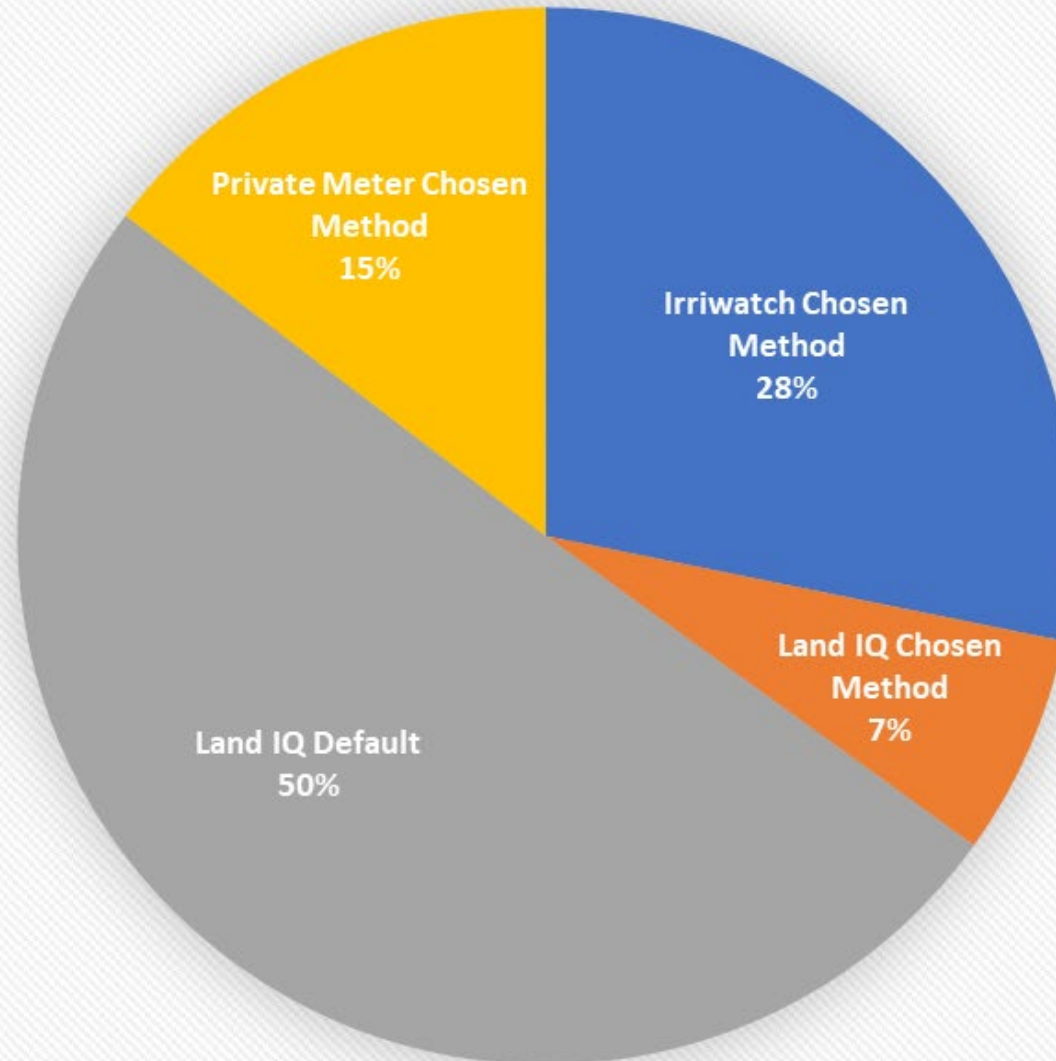




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2023 Measurement Choice by Farm Units



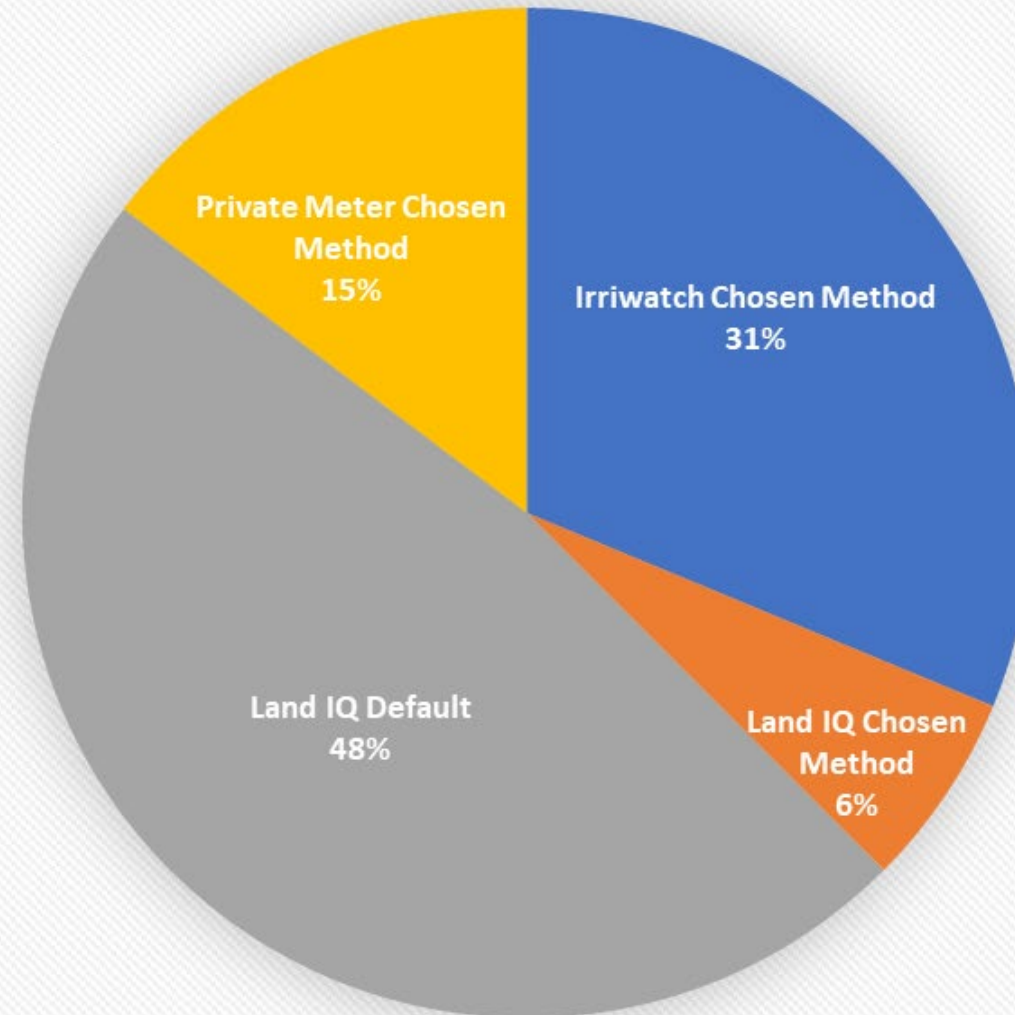
■ Irriwatch Chosen Method ■ Land IQ Chosen Method ■ Land IQ Default ■ Private Meter Chosen Method



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2023 Measurement Choice by APN



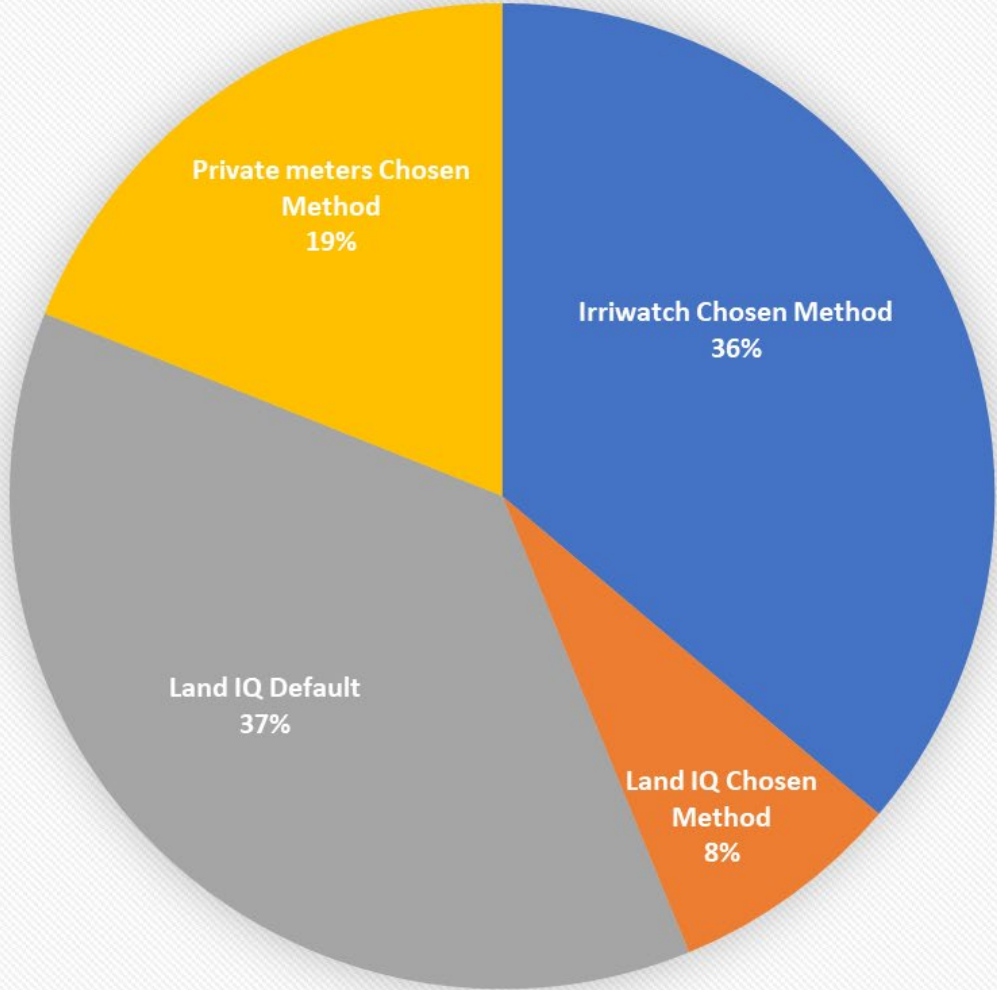
■ Irriwatch Chosen Method ■ Land IQ Chosen Method ■ Land IQ Default ■ Private Meter Chosen Method



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2023 Measurement Choice by Enrolled Acres

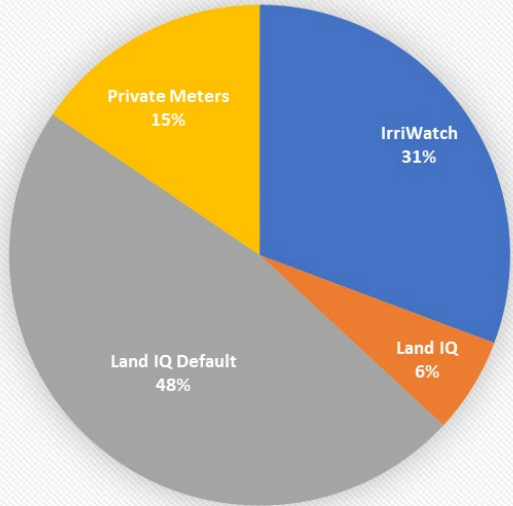


■ Irriwatch Chosen Method ■ Land IQ Chosen Method ■ Land IQ Default ■ Private meters Chosen Method



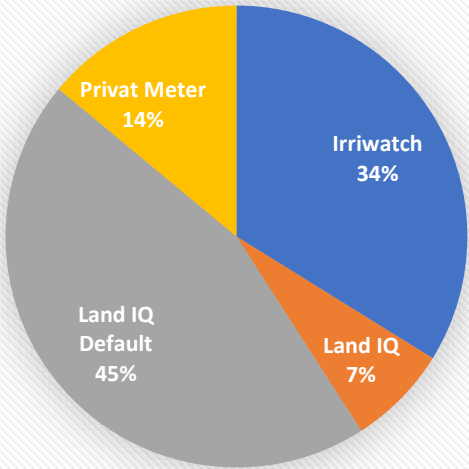
2024 Measurement Methods

2024 Measurement by Farm Units



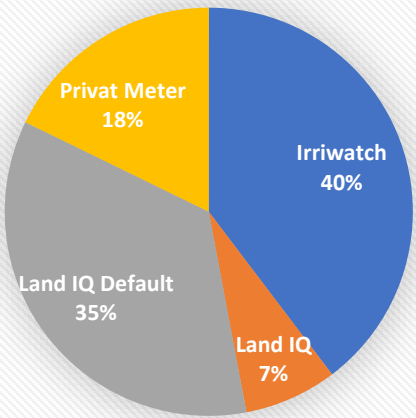
IrriWatch Land IQ Land IQ Default Private Meters

2024 Measurement by APN



Irriwatch Land IQ Land IQ Default Privat Meter

2024 Measurement by Acres



Irriwatch Land IQ Land IQ Default Privat Meter



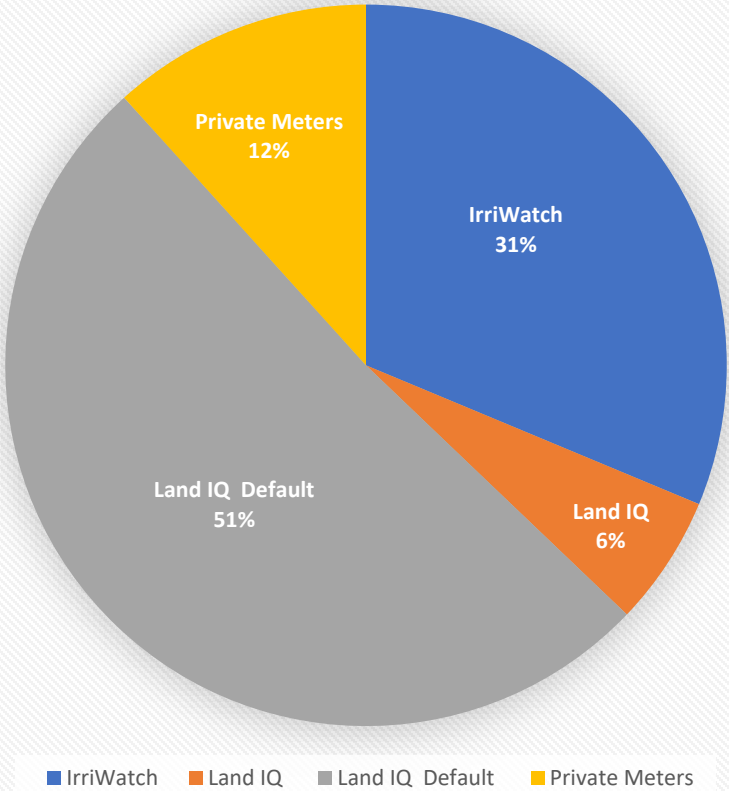
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2025 Measurement Method Choices

2025 Measurement by Farm Units



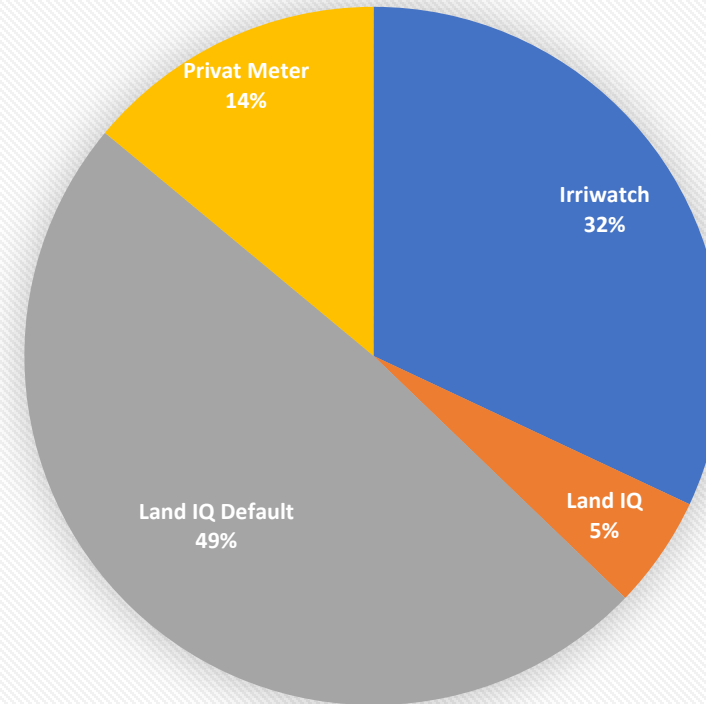
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2025 Measurement Method Choices

2025 Measurement by APNs



Irriwatch Land IQ Land IQ Default Privat Meter

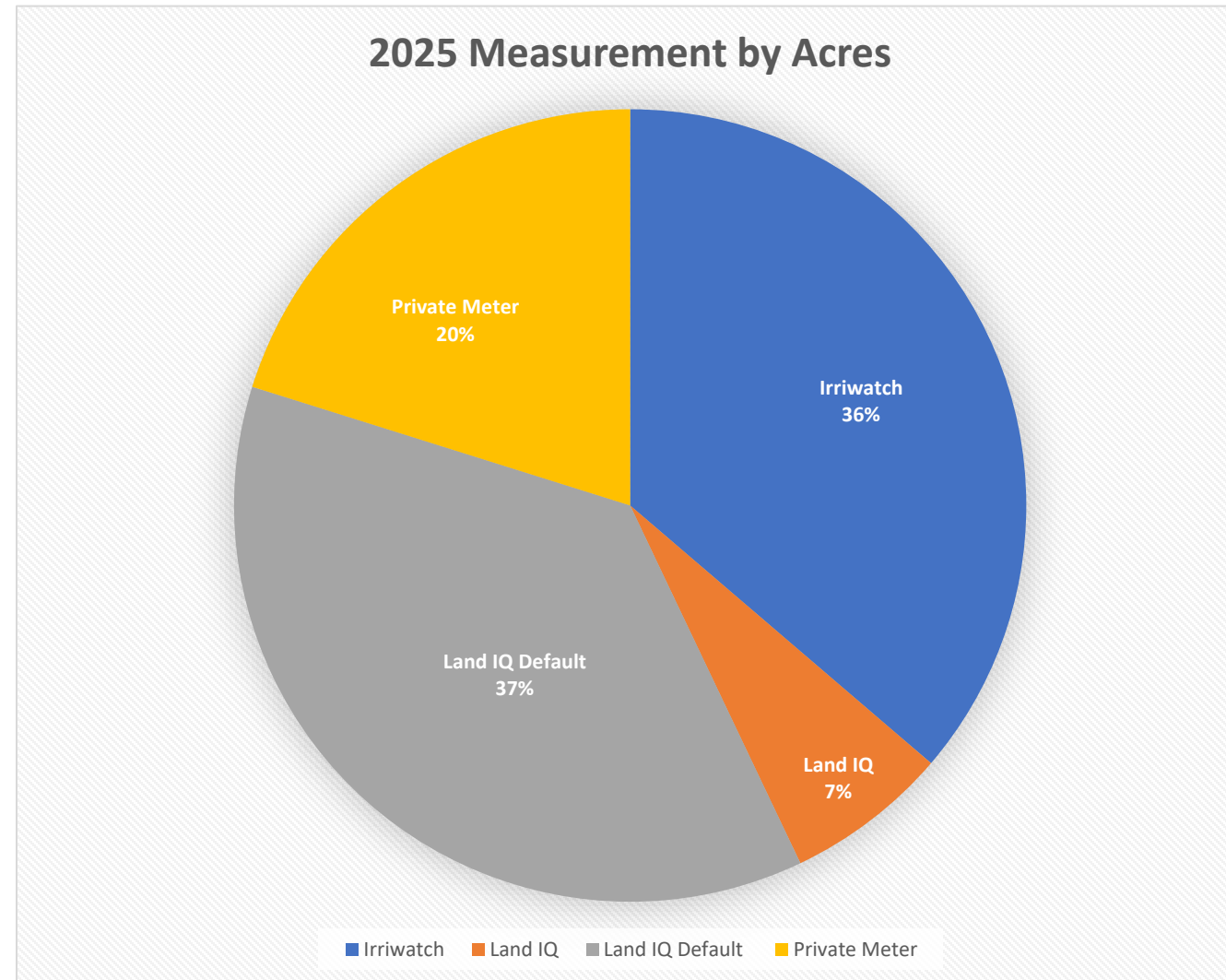


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2025 Measurement Method Choices



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Costs for Full Options

Measurement	2023 Costs	2024 Costs	2025 Costs (estimated)	Proposed 2026 (forecasted)
Hydrosat (Irrigate)	\$176,284	\$157,837	\$157,837 (total)	\$164,340
Consultant support for Hydrosat	\$110,669	\$98,322	\$47,465 (to date)	\$100,000
Land IQ	\$193,048	\$159,181	\$126,204 (total)	\$---
Consultant support for Land IQ	\$97,324	\$86,567	\$39,425 (to date)	\$---
Consultant support for Meters	\$168,339	\$111,040	\$61,056 (to date)	\$100,000
Staff support for Meters	\$100,000 (total)	\$80,000 (total)	\$60,000 (total)	\$60,000
Appeal Process with GEI	\$13,793.25	\$16,480.50	\$35,832.75	\$---
Total	\$ 859,457	\$ 708,428	\$ 467,819.75	\$ 424,340



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ITEM 4.i

Informational Item:
Demand Management Policy Options Moving Ahead



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Existing Allocation Timeline

2020 – Allocation principles adopted by Advisory Committee and Board of Directors

2021 – Allocations and refinements adopted by Board of Directors

2022 – Allocations in place (“dry run”)

2023 – Allocations in place with penalty (\$100/AF over farm unit allocation)

2024 – Allocations in place with penalty (\$200/AF over farm unit allocation)

2025 – Allocations in place with penalty (\$300/AF over farm unit allocation)



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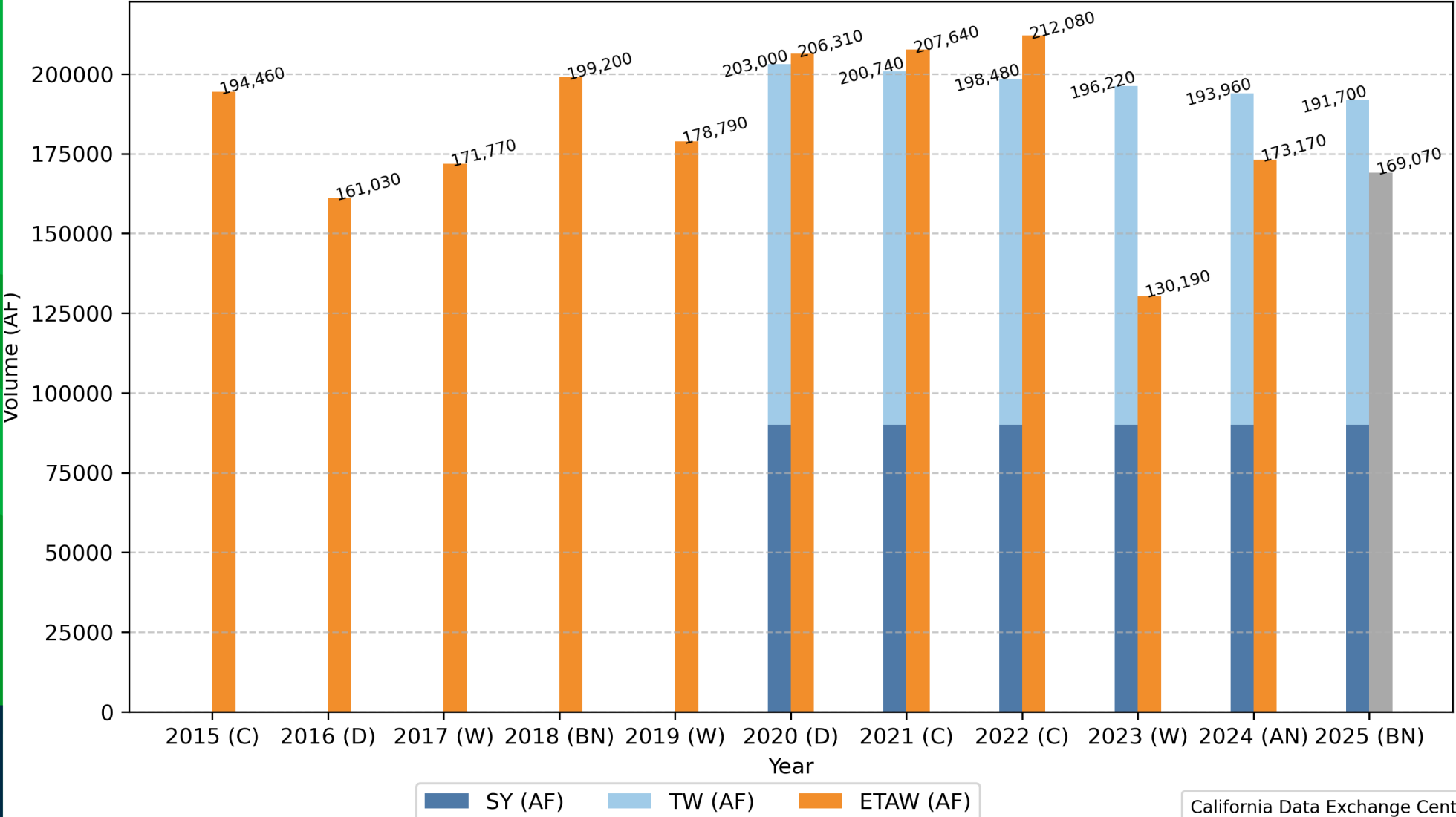


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Madera County GSAs Madera Subbasin Volume (AF) per year (2020-2025)

2025 Data is Cumulative Through August 31, 2025



This analysis is based on a total geometric acreage of 88,250 AC for the Madera Subbasin for all years.

Note: Consumptive use of applied surface water data has been excluded from this ETAW analysis if the data has been provided.

Note: The 2025 water year index is preliminary index and has not been officialized.

- California Data Exchange Center
San Joaquin Valley Water Year Index
- Wet (W)
 - Above Normal (AN)
 - Below Normal (BN)
 - Dry (D)
 - Critical (C)

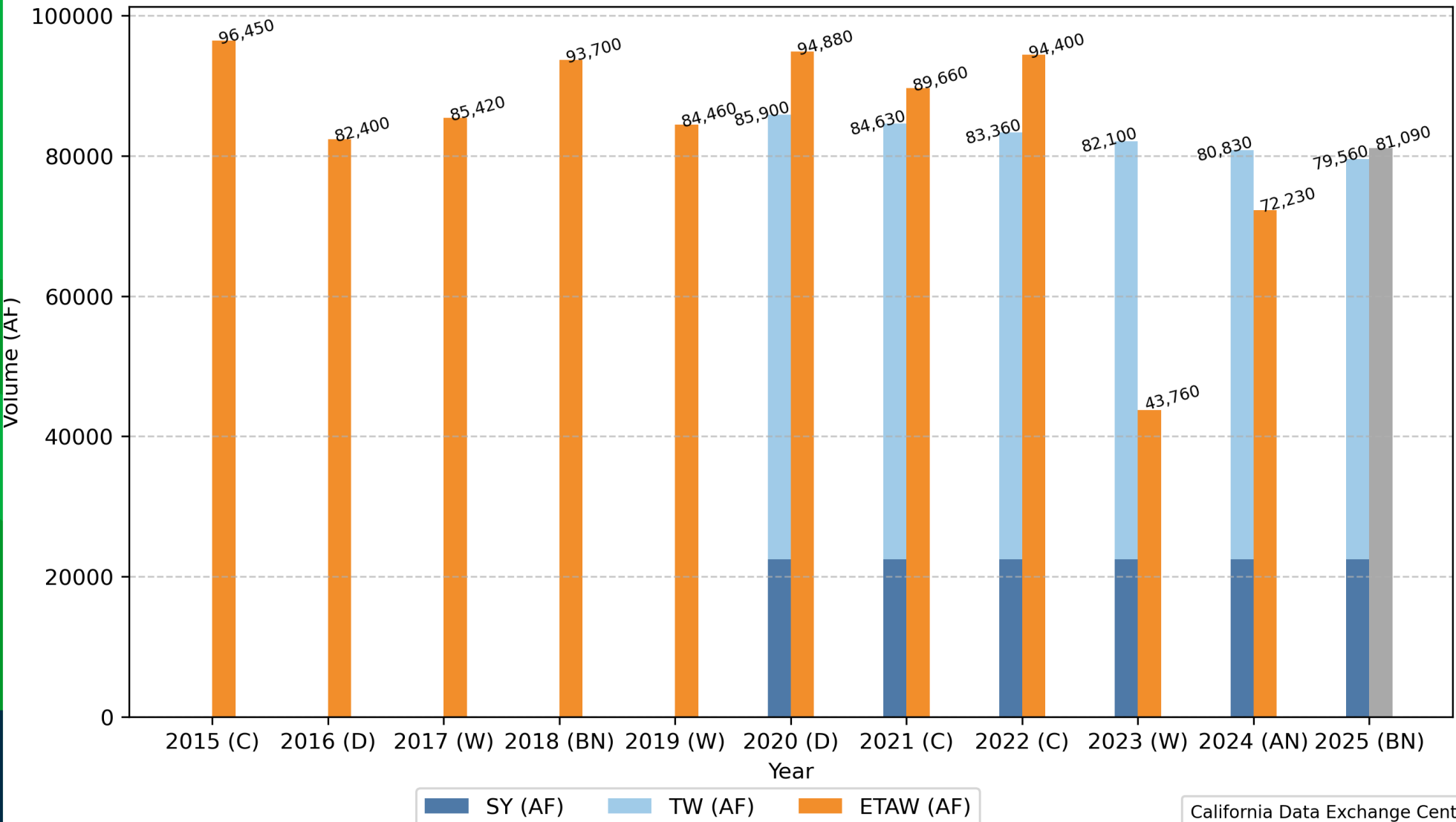


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Madera County GSAs Chowchilla Subbasin Volume (AF) per year (2020-2025)

2025 Data is Cumulative Through August 31, 2025



This analysis is based on a total geometric acreage of 38,100 AC for the Chowchilla Subbasin for all years.

Note: Consumptive use of applied surface water has been excluded from this ETAW analysis if the data has been provided.

Note: The 2025 water year index is preliminary index and has not been officialized.

California Data Exchange Center
San Joaquin Valley Water Year Index

- Wet (W)
- Above Normal (AN)
- Below Normal (BN)
- Dry (D)
- Critical (C)



Survey Summary

In a summary of comparable agencies with allocations, these ideas are already implemented:

	Madera County GSA	Merced Subbasin GSA	North Fork Kings GSA	Eastern Tule GSA	Eastern Kaweah GSA	Greater Kaweah GSA	Lower Tule River Irrigation District GSA
Penalties for Allocations	Starts at \$100/AF for 2023, increases to \$500/AF by 2027, with an additional \$1000/farm unit penalty in Chowchilla Subbasin	\$500/AF + \$1000 + \$100/day; repeated violations may trigger additional restrictions	In process (allocation without penalties in 2026)	Penalties vary by year; \$392/AF in 2025 for Tier 1 (anything beyond SY) and \$500/AF for Tier 2	Yes; \$500/AF with a one-to-one loss in the following year allocations	Tier 3 is \$500/AF plus loss of that amount of water from the following years allocation	\$500/AF over an allocation, plus a consumption charge (buying an alternative supply)
Allocation Zones	Allocations differ depending on subbasin zones	Yes, 8 zones; allocations are the same across all zones currently	In process	Land Subsidence Management Zone on Friant-Kern Canal (AF reduced depending on location)	No	No; may establish management areas soon to discourage lower aquifer pumping	No; may establish subsidence zones soon
Carryover Rules	No expiration; no decay	No decay; recharge credits decay after five years	In process, but discussed 2-year limit	Carryover expires in five years	Only native allocation can carryover; carryover expires in five years	Carryover expires in five years if paid for originally in the year it was allocated	No decay; order of water used by priority determined by GSA (Precipitation, SY, recharge, TW)
Number of Measurement Methods	Hydrosat, LandIQ, private meter, with an option to appeal	OpenET, private party monthly satellite measurements; monthly meter data	Land IQ with ability to dispute with meter data (appeal)	Land IQ; meter data to appeal; special requirements in subsidence zone for metering	Land IQ; opt-in process for meters with substantial rules	Land IQ; opt-in process for meters with substantial rules	Land IQ; meter or other measurement for appeal
Small Farm Rules	No	No	Potentially, in process	No	No	No	No



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Discussion

Staff is seeking feedback on the following ideas:

Raise penalty to \$500/AF for 2026 (rather than in 2027)

Introduce restrictions on carryover to mimic groundwater realities (decay and/or time for use and/or order of use)

Remove water used over the allocation by farm unit from the next year's allocation with "repeat offenders"



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