

5. SUSTAINABLE MANAGEMENT CRITERIA

As required by Subarticle 3. Sustainable Management Criteria of the GSP regulations, the GSPs must include a sustainability goal and definitions of undesirable results, in addition to defining what is considered to be significant and unreasonable and establishing minimum thresholds, measurable objectives and 5-year interim goals. Given the variability of conditions within the Delta-Mendota Subbasin, a subbasin-wide sustainability goal and definitions of undesirable results were developed at the subbasin-level, while the definitions of significant and unreasonable, minimum thresholds, measurable objectives and 5-year interim goals were established at the GSP Plan area-level.

This section describes the coordinated sustainability goal and definition of undesirable results at a subbasin-level and the sustainable management criteria at a GSP-level. Sustainable management criteria developed by each GSP Group were further compared and coordinated between neighboring GSP Groups to avoid conflicts, particularly in setting numeric minimum thresholds, measurable objectives, and interim milestones at boundary locations. The sustainable management criteria for each GSP Group for each applicable sustainability indicator are presented herein.

5.1 Coordinated Assumptions and Data

All common coordinated assumptions and data agreed upon and implemented by each GSP Group in developing their respective sustainable management criteria for each applicable sustainability indicator are presented in Technical Memoranda 4 (*Assumptions for Delta-Mendota Subbasin Management Areas, Sustainability Indicators, and GSP Documentation*), which is included in **Appendix B** of this Common Chapter.

During preparation of the January 2020 GSP, each GSP Group drafted their respective sustainable management criteria for each applicable sustainability indicator and then met with their neighboring GSP Groups to coordinate minimum thresholds and measurable objectives to avoid conflicts and ensure each GSP Group would not negatively impact their neighboring GSP Groups from achieving sustainability. In the CIL received on January 21, 2022, DWR stated that “The GSPs have not established common definitions of undesirable results in the Subbasin.” nor did they comply with the Emergency GSP Regulations in establishing common definitions and methodologies for SMC. In response, subsequent to receipt of the CIL, the Technical Working Group and Coordination Committee met to develop, at a subbasin level, singular coordinated definitions and methods for establishing SMC for each applicable sustainability indicator.

5.2 Coordinated Sustainability Goal and Undesirable Results

The sustainability goal for the Delta-Mendota Subbasin was established to succinctly state the objectives and desired conditions of the Subbasin that culminates in the absence of undesirable results by 2040. The sustainability goal for the Delta-Mendota Subbasin is as follows and was approved by the Delta-Mendota Subbasin Coordination Committee during the June 10, 2019 meeting:

The Delta-Mendota Subbasin will manage groundwater resources for the benefit of all users of groundwater in a manner that allows for operational flexibility, ensures resource availability under drought conditions, and does not negatively impact surface water diversion and conveyance and delivery capabilities. This goal will be achieved through the implementation of the proposed projects and management actions to reach identified measurable objectives and milestones through the implementation of the GSP(s), and through continued coordination with neighboring subbasins to ensure the absence of undesirable results by 2040.

The following definitions of “undesirable results” were agreed upon during the 20222 revision of this Common Chapter for the following applicable sustainability indicators:

- **Chronic lowering of groundwater levels** - Chronic changes in groundwater levels that diminish access to groundwater, causing significant and unreasonable impacts to beneficial uses and users of groundwater.
- **Reduction in groundwater storage** - A chronic decrease in groundwater storage that causes a significant and unreasonable impact to the beneficial uses and users of groundwater.
- **Degraded water quality** - Degradation of groundwater quality as a result of groundwater management activities that causes significant and unreasonable impacts to beneficial uses and users of groundwater.
- **Land subsidence** - Changes in ground surface elevation that cause damage to critical infrastructure, including significant and unreasonable reductions of conveyance capacity, impacts to natural resource areas, or conditions that threaten public health and safety.
- **Depletions of interconnected surface water** - Depletions of interconnected surface water as a direct result of groundwater pumping that cause significant and unreasonable impacts on natural resources or downstream beneficial uses and users.

5.3 GSP-Level Sustainable Management Criteria

In the original 2020 GSP submittals for the Delta-Mendota Subbasin, each GSP Group defined what was considered significant and unreasonable in their Plan Area for each applicable sustainability indicator, in addition to establishing minimum thresholds, measurable objectives and 5-year interim goals for their Plan Area, consistent with GSP Regulations Article 5. Plan Contents, Subarticle 3. Sustainable Management Criteria (§ 354.2 through 354.30). DWR’s *Draft Best Management Practices for the Sustainable Management of Groundwater Sustainable Management Criteria BMP* (2017) document was also used when and where applicable at the discretion of each GSP Group.

Subsequent to this submittal, the Technical Working Group and Coordination Committee met to develop consistent definitions and methodologies for establishing numeric metrics for each applicable sustainability indicator. These revised SMC are discussed in the next section.

5.4 Delta-Mendota Subbasin Sustainable Management Criteria

The sustainable management criteria for each sustainability indicator contains the following components: the subbasin-wide definitions of an undesirable result and of significant and unreasonable, sustainability goals, minimum thresholds (MTs), measurable objectives (MOs), and five-year interim milestones (IMs). Separate tables show the sustainable management criteria for chronic lowering of groundwater levels, reduction in groundwater storage, degraded water quality, land subsidence, and depletions of interconnected surface water with maps showing representative monitoring sites with corresponding numeric MTs and MOs, and a table summarizing the MTs and MOs by representative monitoring location.

5.4.1 Chronic Lowering of Groundwater Levels

Chronic Lowering of Groundwater Levels is arguably the most fundamental Sustainability Indicator, as it directly and indirectly influences several other Sustainability Indicators, such as Reduction of Groundwater Storage, Land Subsidence, and Degraded Water Quality. The Subbasin GSAs are committed to maintaining groundwater levels above historic low conditions in order to avoid undesirable results to beneficial uses and users of groundwater and to prevent further decrease of groundwater levels due to groundwater management actions performed within the Subbasin.

The GSAs developed SMCs for Chronic Lowering of Groundwater Levels using readily available historic records of groundwater level data for 61 of the 75 Representative Monitoring Sites (RMS). The MTs and MOs were developed for each RMS using common data and coordinated assumptions, as detailed in **Table CC-16**, and are consistent with the requirement of Title 23 of the California Code of Regulations (23 CCR) § 354.28(c) to consider trends in historic groundwater levels, water year type, projected water use in the Basin, and relationship with other sustainability indicators. The equivalent process was used in both the Upper Aquifer and Lower Aquifer within the Subbasin.

The MT is currently established as a fixed elevation at each RMS, equivalent to the historic seasonal low prior to the end of WY2016, based on available groundwater level data. The MO is to maintain water levels at or above the Water Year 2015 seasonal high at more than 50% of RMS in a GSP area. The GSAs will conduct a minimum of bi-annual groundwater level monitoring to track progress towards sustainability at the 75 RMS.

Per the definition of Undesirable Results for Chronic Lowering of Groundwater Levels, the exceedance of a MT at a single RMS is not indicative of an Undesirable Result; rather, the exceedance of MTs at 50% or more RMS within a GSP area is considered to cause significant and unreasonable impacts to locally-specific beneficial uses and users of groundwater, namely the increased costs associated with modifying wells to access groundwater, securing alternative sources, or required mitigation of groundwater dependent ecosystems. To account for future year-to-year variations in hydrology, compliance will be assessed by comparing a four-year rolling average of groundwater level measurements to the fixed MT at each RMS within a GSP area.

In addition to the SMCs developed as part of this GSP, the GSAs will continue to coordinate to develop shorter-term (“acute”) groundwater level thresholds in the five-year GSP update that will be submitted in 2025. These thresholds will be set at levels that avoid short-term undesirable results, particularly for domestic water users, groundwater dependent ecosystems, and interconnected surface waters and subsidence when present. Each year, both the historic seasonal low MT value and the acute groundwater elevation thresholds will apply, whichever is more protective.

Table CC-16: Delta-Mendota Subbasin SMC for Chronic Lowering of Groundwater Levels	
Definition of Undesirable Results	Chronic changes in groundwater levels that diminish access to groundwater, causing significant and unreasonable impacts to beneficial uses and users of groundwater.
Definition of Significant and Unreasonable	Significant and unreasonable impacts to beneficial uses and users of groundwater are substantially increased costs associated with higher total pumping lift, lowering pumps, drilling deeper wells, or otherwise modifying wells to access groundwater, securing alternative water sources, or required mitigation of groundwater dependent ecosystems. Significant

Table CC-16: Delta-Mendota Subbasin SMC for Chronic Lowering of Groundwater Levels	
	and unreasonable is quantitatively defined as exceeding the MT at more than 50% of representative monitoring sites by aquifer in a GSP area.
Sustainability Goal	Maintain groundwater levels that are comparable to existing conditions (historic low conditions as of Water Year 2016) in order to continue meeting the demand of beneficial uses and users of groundwater and prevent a trend of decreasing groundwater levels. The Delta-Mendota Subbasin will continue successful and ongoing coordination with neighboring Subbasins to address chronic lowering of groundwater levels caused by pumping outside of the Subbasin.
Minimum Threshold	<p>The groundwater elevation indicating a chronic lowering of groundwater levels that may lead to undesirable results is an elevation that is lower than the historical seasonal low. The historic seasonal low is a fixed elevation at each site, based on available groundwater level data prior to the end of Water Year 2016. To account for future year-to-year variations in hydrology, compliance with the fixed historic seasonal low threshold will be compared with a 4-year rolling average of annual groundwater level measurements.</p> <p>Shorter-term (“acute”) groundwater elevation thresholds will also be established at each representative monitoring site by 2025 using a coordinated methodology. Acute thresholds will be established at levels that are intended to avoid short-term undesirable results, particularly for domestic water wells, groundwater dependent ecosystems, and interconnected surface waters where present in the Upper Aquifer, and for subsidence in the Lower Aquifer. Each year, both the historic seasonal low and the acute groundwater elevation thresholds will apply, whichever is more protective. Groundwater levels are measured as water surface elevation (WSE). Each GSP area includes multiple representative monitoring sites (RMS) to which the minimum threshold applies. See Table CC-17 for numeric MTs.</p> <p>For any RMS without data prior to Water Year 2016, MTs and acute thresholds will be established using the aforementioned methodologies and the data resulting from the first five years of monitoring following Water Year 2016 or following construction of the well.</p>
Measurable Objective	<p>Maintain seasonal high groundwater levels at an elevation that is at or above the Water Year 2015 seasonal high at more than 50% of representative monitoring sites in a GSP area. The Water Year 2015 seasonal high is a fixed elevation at each site, based on available groundwater level data. If data are unavailable for Water Year 2015 at a representative monitoring site, either a Water Year 2014 or Water Year 2016 Seasonal High will be used. To account for future year-to-year variations in hydrology, compliance with the fixed seasonal high threshold will be compared with a 4-year rolling average of annual groundwater level measurements. Groundwater levels are measured as water surface elevation (WSE). Each GSP area includes multiple representative monitoring sites (RMS) to which the measurable objective applies. See Table CC-17 for numeric MOs.</p> <p>For any RMS without data prior to Water Year 2016, Measurable Objectives will be established using the aforementioned methodology and</p>

Table CC-16: Delta-Mendota Subbasin SMC for Chronic Lowering of Groundwater Levels	
	the data resulting from the first five years of monitoring following Water Year 2016 or following the construction of the well.
5-Year Interim Milestones	<p>Year 5: Gather data and complete the establishment of seasonal low and seasonal high elevations at representative monitoring sites in the Lower Aquifer for the Grassland GSP area. Develop a coordinated methodology and complete the establishment of acute groundwater elevation thresholds. Identify chronic lowering of groundwater levels caused by pumping outside the Subbasin.</p> <p>Year 10: Maintain groundwater levels at MOs. Where chronic lowering of groundwater levels is caused by pumping outside of the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs.</p> <p>Year 15: Maintain groundwater levels at MOs. Where chronic lowering of groundwater levels is caused by pumping outside of the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs.</p>

The numeric MTs and MOs by RMS are shown below in **Figure CC-65** for the Upper Aquifer and **Figure CC-66** for the Lower Aquifer, with the numeric SMC tabulated in **Table CC-17**.

Table CC-17: Numeric SMC for the Chronic Lowering of Groundwater Levels

DMS ID	GSP Region	Principal Aquifer	Minimum Threshold (ft above MSL, NAVD88)	Measurable Objective (ft above MSL, NAVD88)
09-001	Aliso Water District	Upper	40.5	114.3
09-002	Aliso Water District	Upper (Composite)	-4.0	17.1
09-003	Aliso Water District	Upper	37.4	52.9
09-004	Aliso Water District	Upper	37.7	51.9
10-001	Farmers Water District	Upper	34.0	102.7
12-001	Fresno County	Upper	98.2	103.2
13-001	Fresno County	Upper	109.4	120.5
13-003	Fresno County	Upper	48.6	116.1
13-004	Fresno County	Lower	-59.0	-27.0
11-001	Grassland	Lower	TBD	TBD
11-002	Grassland	Lower	TBD	TBD
11-003	Grassland	Lower	TBD	TBD
11-004	Grassland	Lower	TBD	TBD

DMS ID	GSP Region	Principal Aquifer	Minimum Threshold (ft above MSL, NAVD88)	Measurable Objective (ft above MSL, NAVD88)
11-005	Grassland	Lower	TBD	TBD
11-006	Grassland	Lower	TBD	TBD
11-007	Grassland	Upper	79.9	91.1
11-008	Grassland	Upper	82.3	93.2
11-009	Grassland	Upper	63.4	77.3
11-013	Grassland	Upper	76.8	80.4
11-014	Grassland	Upper	68.1	80.7
11-015	Grassland	Upper	72.8	75.7
11-016	Grassland	Upper	83.1	92.8
11-017	Grassland	Upper	90.2	116.6
11-019	Grassland	Upper	27.0	27.0
19-003	Grassland	Upper	90.5	91.8
01-001	NCDM	Lower	-44.9	-13.4
01-002	NCDM	Lower	-36.1	-18.9
01-003	NCDM	Lower	-21.8	62.3
01-004	NCDM	Upper	158.9	161.8
01-005	NCDM	Upper	110.6	179.6
01-006	NCDM	Lower	77.1	94.0
01-007	NCDM	Lower	12.3	56.7
01-008	NCDM	Lower	-44.9	2.4
02-002	NCDM	Lower	-18.3	33.7
02-009	NCDM	Upper	-6.2	29.8
03-001	NCDM	Upper	30.7	46.7
03-002	NCDM	Upper	7.7	67.2
03-003	NCDM	Upper	TBD	TBD
04-001	NCDM	Lower	-17.6	-3.6
06-001	NCDM	Lower	-52.3	16.1
06-002	NCDM	Upper	31.5	44.6
06-003	NCDM	Lower	-9.1	18.5
06-004	NCDM	Upper	14.8	30.5
07-002	NCDM	Lower	1.6	10.8
07-003	NCDM	Upper	62.5	89.9
07-005	NCDM	Lower	-84.7	-41.8
07-007	NCDM	Lower	-53.4	-26.6
07-008	NCDM	Lower	-63.0	-47.0
07-009	NCDM	Upper	49.3	73.9
07-010	NCDM	Upper	64.0	96.2
07-012	NCDM	Upper	TBD	TBD
07-014	NCDM	Lower	-133.5	-47.2

DMS ID	GSP Region	Principal Aquifer	Minimum Threshold (ft above MSL, NAVD88)	Measurable Objective (ft above MSL, NAVD88)
07-015	NCDM	Lower	-147.0	-65.0
07-016	NCDM	Lower	-2.4	74.6
07-017	NCDM	Upper	TBD	TBD
07-018	NCDM	Upper	TBD	TBD
07-028	NCDM	Lower	-88.2	-64.8
07-029	NCDM	Upper	TBD	TBD
07-030	NCDM	Lower	TBD	TBD
07-031	NCDM	Lower	TBD	TBD
07-032	NCDM	Lower	TBD	TBD
07-035	NCDM	Upper	-99.8	95.2
08-002	NCDM	Upper	50.7	83.7
14-001	SJREC	Upper	24.0	48.5
14-002	SJREC	Upper	96.5	125.7
14-003	SJREC	Upper	81.3	92.2
14-004	SJREC	Upper	78.7	92.6
14-005	SJREC	Upper	92.2	106.2
14-006	SJREC	Upper	76.7	98.2
14-007	SJREC	Upper	73.5	98.5
14-008	SJREC	Upper	70.5	98.5
14-019	SJREC	Lower	-48.8	35.0
14-020	SJREC	Lower	38.1	57.4
14-021	SJREC	Lower	-33.0	14.8
23-001	SJREC	Upper	102.3	120.2

T-D - Numeric SMC to be determined after five years of data have been collected for this representative monitoring site.

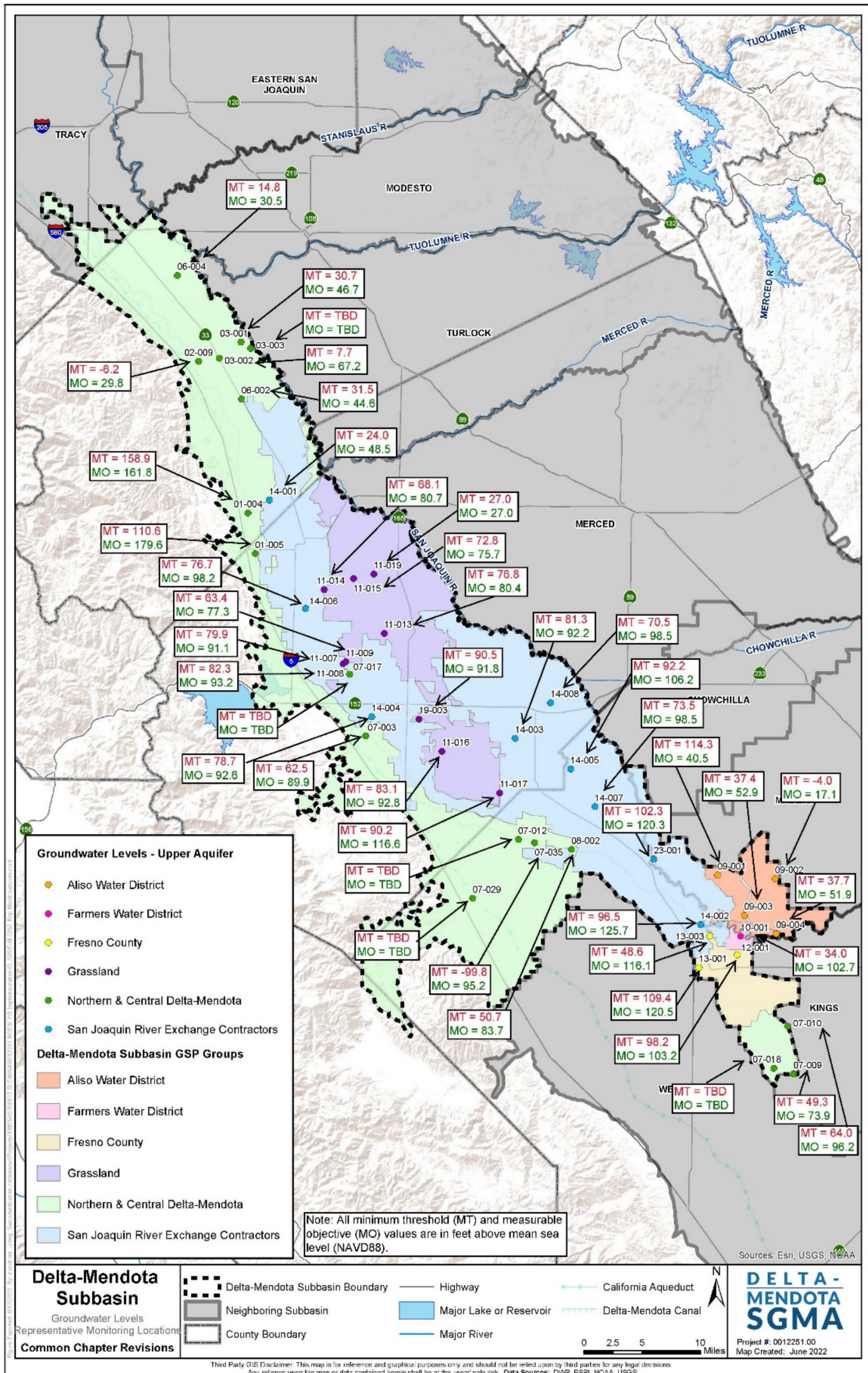


Figure CC-65: Groundwater Level Representative Monitoring Locations with SMC – Upper Aquifer

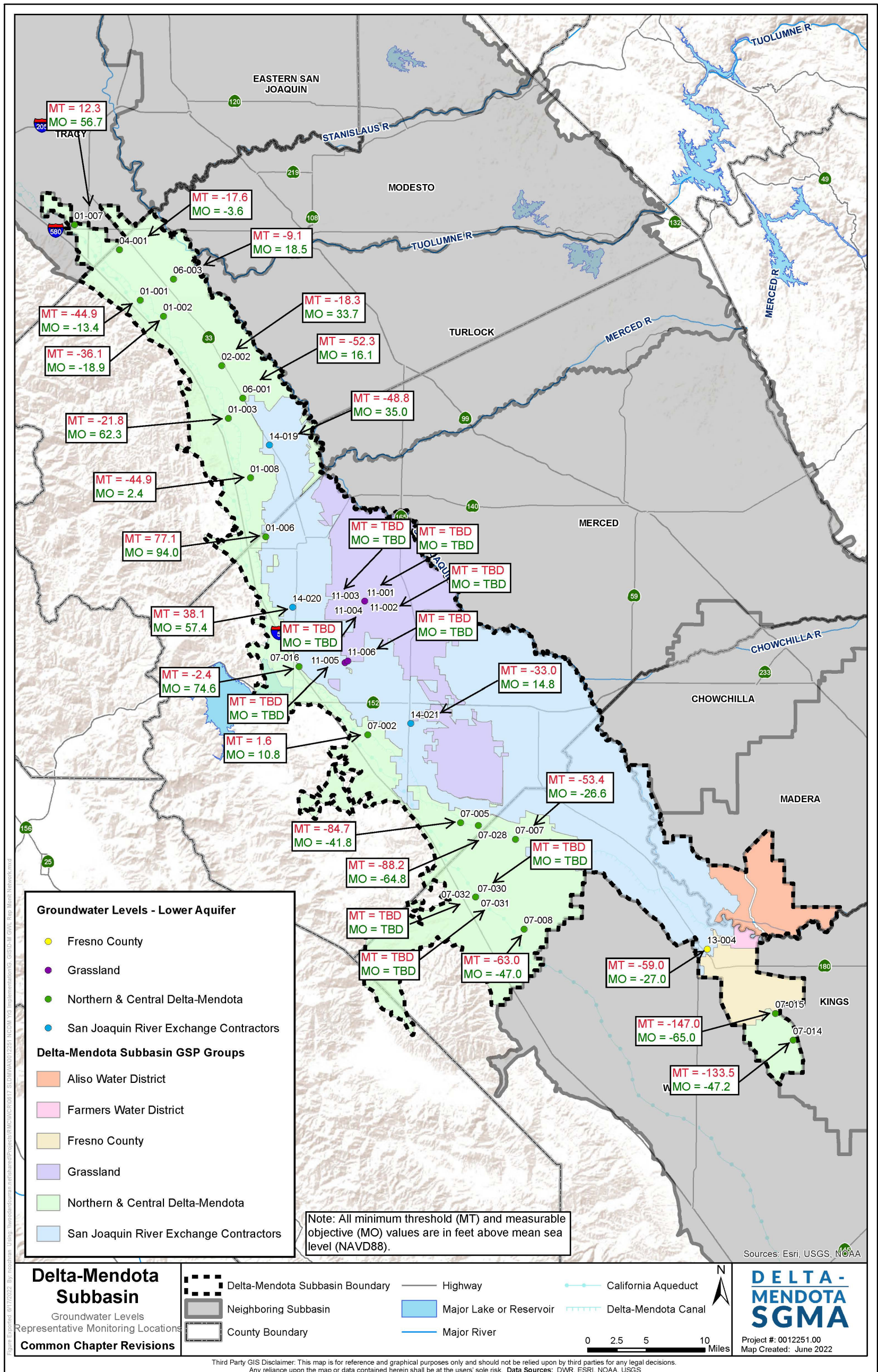


Figure CC-66: Groundwater Level Representative Monitoring Locations with SMC – Lower Aquifer

5.4.2 Reduction in Groundwater Storage

The GSAs intend to maintain groundwater storage at volumes that will continue to meet the demands of beneficial uses and users of groundwater, provide a three-year drought buffer, and minimize reductions in groundwater storage during extended dry periods. Further, the GSAs will coordinate with neighboring subbasins to address reductions in groundwater storage caused by pumping outside of the Subbasin. The SMCs were developed using common data and coordinated assumptions, as detailed in **Table CC-18** and will be monitored a minimum of bi-annually as detailed for Chronic Lowering of Groundwater Levels in Section 5.4.1 (**Table CC-16**) and consistent Land Subsidence monitoring as detailed in Section 5.4.4 (**Table CC-21**).

Pursuant to 23 CCR § 354.28(d), the MTs for Reduction of Groundwater Storage may be set by using groundwater levels as a proxy if it is demonstrated that a correlation exists between the two metrics. It is logical to link these two Sustainability Indicators for the Upper Aquifer, as the amount of groundwater in storage is directly, if not linearly, related to groundwater levels. As such, in the Upper Aquifer, it is not necessary to set a unique MT for Reduction of Groundwater Storage, and the MTs for Chronic Lowering of Groundwater Levels are used as a proxy for the Reduction of Groundwater Storage Sustainability Indicator. Similarly, the MOs for Chronic Lowering of Groundwater Levels serves as a proxy for Reduction of Groundwater Storage. Because the SMCs established for Chronic Lowering of Groundwater Levels are designed to maintain groundwater levels above historic low conditions, they are protective of the Reduction of Groundwater Storage Sustainability indicator and local beneficial uses and users of the Upper Aquifer, as the SMCs maintain sufficient water storage to maintain beneficial uses, including the conjunctive use of groundwater.

In the Lower Aquifer, the physical reduction in groundwater storage is caused by inelastic land subsidence, as detailed in Section 5.4.4 (**Table CC-21**). As such, the SMCs set for Land Subsidence (which are designed to reduce subsidence caused by groundwater extraction in the Subbasin, with no additional subsidence after 2040) are reasonably protective and used as a tool to calculate the Reduction of Groundwater Storage Sustainability Indicator SMCs in the Lower Aquifer¹.

¹ The most significant subsidence in the Subbasin observed between from 2014-2018 was a 0.6-foot decline at Check 18 of the Delta-Mendota Canal. During those same years, the water budget calculation estimated what the change in storage was in the Lower Aquifer. Given the apparent relationship between the loss in groundwater storage and the observed subsidence, the projected allowable additional subsidence (i.e., two feet by 2040) was converted to a groundwater storage volume in the Lower Aquifer and used as the SMC.

Table CC-18: Delta-Mendota Subbasin SMC for Reduction in Groundwater Storage	
Definition of Undesirable Results	A chronic decrease in groundwater storage that causes a significant and unreasonable impact to the beneficial uses and users of groundwater.
Definition of Significant and Unreasonable	A significant and unreasonable impact to beneficial uses and users of groundwater is insufficient water storage to maintain beneficial uses and natural resource areas in the Subbasin, including the conjunctive use of groundwater.
Sustainability Goal	Maintain historic groundwater storage volumes in order to continue meeting the demand of beneficial uses and users of groundwater and to provide a 3-year drought buffer. Minimize reductions in groundwater storage during extended dry periods. Work with neighboring Subbasins to address reduction in groundwater storage caused by pumping outside of the Subbasin.
Minimum Threshold	For the Upper Aquifer, as a reasonable proxy for an individual groundwater storage threshold, maintain groundwater levels in accordance with the minimum threshold set for Chronic Lowering of Groundwater Levels. For the Lower Aquifer, correlate the SMCs for inelastic land subsidence with the reduction in groundwater storage that would cause undesirable results, estimated to be 1.1 million acre-feet of storage loss by 2040 attributable to groundwater extraction in the Subbasin.
Measurable Objective	For the Upper Aquifer, maintain groundwater levels in accordance with the measurable objectives set for Chronic Lowering of Groundwater Levels. For the Lower Aquifer, minimize loss of groundwater storage caused by inelastic land subsidence.
5-Year Interim Milestones	Year 5: Maintain groundwater levels in accordance with the measurable objectives. Identify reduction in groundwater storage caused by pumping outside the Subbasin. Year 10: Maintain groundwater levels in accordance with the measurable objectives. Where reduction in groundwater storage is caused by pumping outside of the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs. Year 15: Maintain groundwater levels in accordance with the measurable objectives. Where reduction in groundwater storage is caused by pumping outside of the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs.

5.4.3 Degraded Groundwater Quality

The GSP groups within the Delta-Mendota Subbasin are committed to preventing the migration or elevated concentrations of constituents of concern due to groundwater management activities. The primary constituent of concern in the Subbasin is salinity, frequently reported as total dissolved solids (TDS).

For drinking water, California has three secondary maximum contaminant level (SMCL) standards for TDS, all based on aesthetic considerations such as taste and odor, not public health concerns. These are 500 mg/L (recommended limit), 1,000 mg/L (upper limit), and 1,500 mg/L (short-term limit). To reflect the Subbasin's designation as a Municipal (MUN) beneficial use, as established in the Central Valley Water Control Plans (often referred to as Basin Plans), the Subbasin has selected the upper limit of 1,000 mg/L as the Minimum Threshold.

The Delta-Mendota GSAs also recognize that a Salt Control Program for the San Joaquin Valley was recently developed through the collaborative CV-SALTS Program and was adopted into the Central Valley Basin Plans to address the long-term problem of salt accumulation in the Valley. The program recognizes that salt accumulation and water uses vary widely across the Valley. The program approach is intended to protect beneficial uses by maintaining water quality that meets applicable objectives, allow some salt accumulation in areas where salt can be stored without impairing beneficial uses of water, and, through long-term management, restore water quality where reasonable, feasible, and practicable.

A Prioritization and Optimization (P&O) Study planning process is now underway to identify potential requirements that will protect beneficial uses, improve salt management, and restore water quality where possible. During the next ten years (Phase 1), the P&O Study will: characterize the salt conditions and trends in the Valley; identify salt management needs and mechanisms; evaluate the feasibility of potential solutions; prepare an implementation plan; and review and recommend revising salinity regulations as necessary.¹

The minimum thresholds and measurable objectives for groundwater quality incorporate these standards and objectives for salinity. The minimum threshold is therefore set as 1,000 mg/L TDS, and the measurable objective is a concentration less than 1,000 mg/L TDS with acknowledgement that salinity standards are still being developed by water quality experts and regulatory agencies in the Central Valley, and thus may need to be revised in the future. Additionally, groundwater is frequently blended with other water supplies to reduce TDS concentrations to meet the salinity sensitivity of a particular beneficial use.

For any representative monitoring site that currently exceeds the TDS thresholds set forth above, the existing regulatory water quality compliance and remediation programs will apply. These include, but are not limited to, the CV-SALTS Salt Control Program, the County Drought Plan requirements for State Small Water Systems and Domestic Wells (SB 552), the Safe and Affordable Funding for Equity and Resilience (SAFER) program, and the Bureau of Reclamation's Refuge Water Supply Program. For any future exceedance of the TDS thresholds at representative monitoring sites that do not currently exceed the objectives, the applicable GSP group is required to coordinate and publish an assessment of the effect of groundwater management activities on the documented exceedance, and propose timely actions to manage groundwater differently in order to avoid exacerbating the exceedance.

The sustainable management criteria also incorporate by reference the specific requirements for preventing the migration of contaminants adopted by the Central Valley Regional Water Quality Control Board in Cleanup and Abatement Orders for individual contaminated sites.²

¹ See <https://www.cvsalinity.org/salt-program/>;
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

² E.g., the Cleanup and Abatement Order R5-2018-0033 for the Spreckels facility:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/fresno/r5-2018-0033.pdf

Table CC-19: Delta-Mendota Subbasin SMC for Degraded Groundwater Quality	
Definition of Undesirable Results	Degradation of groundwater quality as a result of groundwater management activities that causes significant and unreasonable impacts to beneficial uses and users of groundwater.
Definition of Significant and Unreasonable	Significant and unreasonable impacts to beneficial uses and users of groundwater as a result of groundwater management activities are the migration of contaminant plumes or elevated concentrations of constituents of concern that reduce groundwater availability, and the degradation of surface water quality as a result of groundwater migration that substantially impair an existing beneficial use. Significant and unreasonable is quantitatively defined as exceeding the MT at more than 50% of representative monitoring sites by aquifer in a GSP area where current groundwater quality (as established in the Subbasins GSPs) does not exceed 1,000 mg/L TDS.
Sustainability Goal	Minimize further impairment of water supplies resulting from groundwater management activities that cause the migration or concentration of contaminant plumes or the increased rate of movement or concentrations of constituents of concern. Coordinate with and support compliance with existing regulatory groundwater quality orders and objectives for drinking water, agricultural irrigation, and managed wetlands. Work with neighboring Subbasins to address existing or potential impairments of groundwater quality in the Subbasin caused by groundwater management activities outside the Subbasin.
Minimum Threshold	<p>The minimum threshold for salinity is 1,000 mg/L TDS. For representative monitoring sites that currently exceed the minimum threshold, existing regulatory water quality compliance and remediation programs will apply, including but not limited to, the CV-SALTS Salt Control Program, the Irrigated Lands Regulatory Program, the County Drought Plan requirements for State Small Water Systems and Domestic Wells (SB 552), and the Safe and Affordable Funding for Equity and Resilience (SAFER) program. For any RMS without data prior to the end of Water Year 2016, current (ambient) groundwater quality will be established using data collected during the first five years of monitoring following Water Year 2016 or following construction of the well.</p> <p>For representative monitoring sites that do not currently exceed the minimum threshold, but are found to exceed minimum thresholds in the future, the applicable GSP group will conduct and publish an assessment of the effect of groundwater management activities on the documented exceedance, and propose timely actions to manage groundwater differently, if needed, to avoid exacerbating the exceedance. The applicable GSP group will also coordinate with the appropriate regulatory program to address the impact.</p>
Measurable Objective	<p>The measurable objective for salinity will be concentrations less than 1,000 mg/L TDS.</p> <p>Each GSP group will participate in, provide data for, and track and report on compliance with orders and objectives adopted by the State and Central Valley Regional Water Quality Control Boards and similar regulatory agencies, in coordination with the Central Valley Groundwater Monitoring Collaborative.</p>

Table CC-19: Delta-Mendota Subbasin SMC for Degraded Groundwater Quality	
5-Year Interim Milestones	<p>Year 5: Maintain salinity consistent with measurable objectives. Participate in, provide data for, and track and report on compliance with orders and objectives adopted by the State Water Resources and Central Valley Regional Water Quality Control Boards and similar regulatory agencies, in coordination with the Central Valley Groundwater Monitoring Collaborative. Develop correlation between groundwater quality and groundwater levels in order to establish methodology for the use of groundwater levels as a proxy for groundwater quality.</p> <p>Year 10: Maintain water quality consistent with measurable objectives. Continue monitoring and publishing groundwater quality data, and tracking and reporting on compliance with regulatory orders and objectives. Where water quality impairments are caused by activities outside the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs. Utilizing the methodology developed by the Year 5 Interim Milestone, develop minimum thresholds and measurable objectives for groundwater quality that utilize groundwater elevations as a proxy for monitoring.</p> <p>Year 15: Maintain water quality consistent with measurable objectives. Continue monitoring and publishing groundwater quality data, and tracking and reporting on compliance with regulatory orders and objectives. Where water quality impairments are caused by activities outside the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs.</p>

The numeric MTs and MOs by RMS are shown below in **Figure CC-67** for the Upper Aquifer and **Figure CC-68** for the Lower Aquifer, with the numeric SMC tabulated in **Table CC-20**.

Table CC-20: Numeric SMC for Degraded Groundwater Quality

DMS ID	GSP Region	Principal Aquifer	Minimum Threshold (TDS in mg/L)	Measurable Objective (TDS in mg/L)
09-002	Aliso Water District	Upper	1,000	< 1,000
09-003	Aliso Water District	Upper	1,000	< 1,000
09-005	Aliso Water District	Upper	1,000	< 1,000
09-196	Aliso Water District	Upper	1,000	< 1,000
10-001	Farmers Water District	Upper	1,000	< 1,000
10-005	Farmers Water District	Upper	1,000	< 1,000
12-002	Fresno County	Upper	N/A	N/A
12-003	Fresno County	Upper	N/A	N/A
12-004	Fresno County	Upper	N/A	N/A
12-005	Fresno County	Upper	N/A	N/A
12-006	Fresno County	Upper	1,000	< 1,000
12-007	Fresno County	Upper	N/A	N/A
13-006	Fresno County	Upper	N/A	N/A
13-007	Fresno County	Upper	N/A	N/A

DMS ID	GSP Region	Principal Aquifer	Minimum Threshold (TDS in mg/L)	Measurable Objective (TDS in mg/L)
13-008	Fresno County	Upper	N/A	N/A
11-010	Grassland	Lower	TBD	TBD
11-011	Grassland	Lower	1,000	< 1,000
11-012	Grassland	Lower	1,000	< 1,000
11-021	Grassland	Upper	N/A	N/A
19-002	Grassland	Upper	1,000	< 1,000
19-004	Grassland	Upper	N/A	N/A
01-001	NCDM	Lower	1,000	< 1,000
01-002	NCDM	Lower	1,000	< 1,000
01-003	NCDM	Lower	N/A	N/A
01-004	NCDM	Upper	1,000	< 1,000
01-006	NCDM	Lower	1,000	< 1,000
01-007	NCDM	Lower	1,000	< 1,000
01-008	NCDM	Lower	1,000	< 1,000
01-018	NCDM	Upper (assumed)	1,000	< 1,000
02-002	NCDM	Lower	1,000	< 1,000
02-009	NCDM	Upper	1,000	< 1,000
03-001	NCDM	Upper	N/A	N/A
03-003	NCDM	Upper	N/A	N/A
03-007	NCDM	Upper	1,000	< 1,000
04-001	NCDM	Lower	1,000	< 1,000
06-001	NCDM	Lower	1,000	< 1,000
06-002	NCDM	Upper	1,000	< 1,000
06-003	NCDM	Lower	1,000	< 1,000
06-004	NCDM	Upper	N/A	N/A
07-002	NCDM	Lower	1,000	< 1,000
07-003	NCDM	Upper	1,000	< 1,000
07-007	NCDM	Lower	1,000	< 1,000
07-008	NCDM	Lower	N/A	N/A
07-012	NCDM	Upper	N/A	N/A
07-014	NCDM	Lower	1,000	< 1,000
07-015	NCDM	Lower	1,000	< 1,000
07-016	NCDM	Lower	1,000	< 1,000
07-017	NCDM	Upper	1,000	< 1,000
07-018	NCDM	Upper	N/A	N/A
07-028	NCDM	Lower	N/A	N/A
07-029	NCDM	Upper	N/A	N/A
07-030	NCDM	Lower	N/A	N/A
07-031	NCDM	Lower	N/A	N/A
07-032	NCDM	Lower	N/A	N/A

DMS ID	GSP Region	Principal Aquifer	Minimum Threshold (TDS in mg/L)	Measurable Objective (TDS in mg/L)
07-033	NCDM	Upper	1,000	< 1,000
07-034	NCDM	Lower (assumed)	N/A	N/A
07-035	NCDM	Upper	N/A	N/A
08-002	NCDM	Upper	N/A	N/A
14-001	SJREC	Upper	1,000	< 1,000
14-002	SJREC	Upper	1,000	< 1,000
14-003	SJREC	Upper	N/A	N/A
14-004	SJREC	Upper	1,000	< 1,000
14-005	SJREC	Upper	N/A	N/A
14-006	SJREC	Upper	1,000	< 1,000
14-007	SJREC	Upper	N/A	N/A
14-008	SJREC	Upper	1,000	< 1,000
14-019	SJREC	Lower	1,000	< 1,000
14-020	SJREC	Lower	1,000	< 1,000
14-021	SJREC	Lower	N/A	N/A
23-001	SJREC	Upper	1,000	< 1,000

Notes:

1. Current TDS concentration is defined as prior to the end of WY 2016.
2. N/A - Current groundwater quality exceeds 1,000 mg/L TDS.
3. TBD - Numeric SMC to be determined after five years of data have been collected for this representative monitoring site.

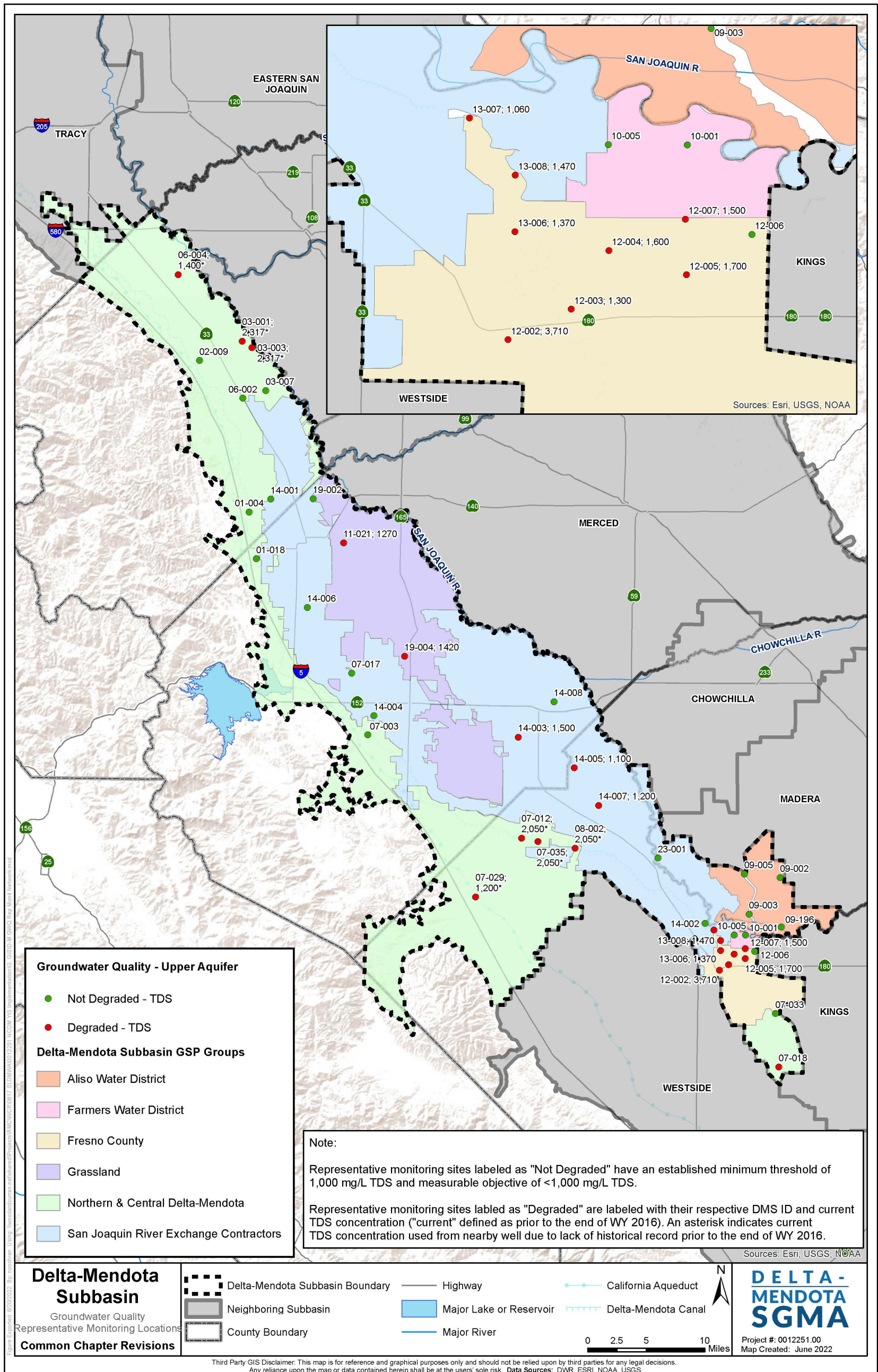


Figure CC-67: Groundwater Quality Representative Monitoring Locations with SMC – Upper Aquifer

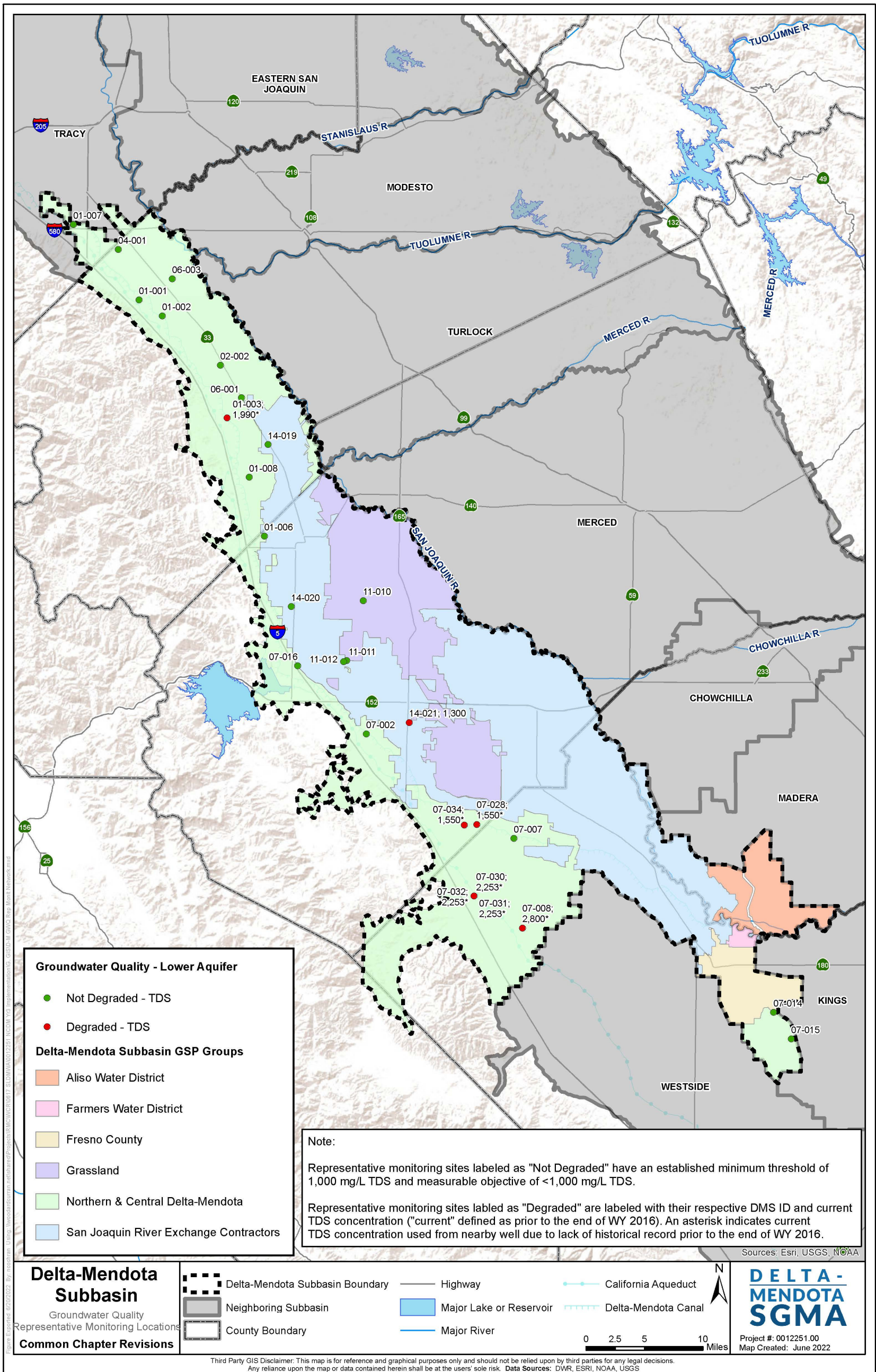


Figure CC-68: Groundwater Quality Representative Monitoring Locations with SMC – Lower Aquifer

5.4.4 Inelastic Land Subsidence

The Subbasin GSAs are committed to ramping down the amount of allowable subsidence caused by groundwater extraction in the Subbasin and eliminating additional subsidence within the Subbasin by 2040. Further, the GSAs will coordinate with neighboring subbasins to address inelastic land subsidence caused by groundwater management activities that occur outside of the Subbasin.

The SMCs for Land Subsidence were coordinated at the Subbasin level and are designed to be protective of critical infrastructure, including significant and unreasonable reductions of conveyance capacity (i.e., structural damage that creates an unmanageable reduction of design capacity), impacts to natural resource areas (i.e., unmitigated decreases in the ability to irrigate or drain these areas by gravity), or conditions that threaten public health and safety (i.e., unmitigated reduction of freeboard that allows for flooding, or unmitigated damage to roads and bridges). The Subbasin-wide MT is set to prevent subsidence that exceeds the corrective design standards or established triggers for critical infrastructure, including the Delta-Mendota Canal and California Aqueduct. At the RMS, the MT is defined as two feet of additional inelastic subsidence by 2040 attributable to groundwater extraction within the Subbasin. The MO is set at no additional subsidence after 2040 based on groundwater extractions within the Delta-Mendota Subbasin.

The GSAs further developed Interim Milestones (IMs) to periodically reduce the amount of allowable subsidence and meet the MO by 2040. The IMs allow for no more than 1.0 foot of additional subsidence by 2025, 0.5 feet of additional subsidence by 2030 (1.5 feet of cumulative subsidence), 0.25 feet of additional subsidence by 2035 (1.75 feet of cumulative subsidence), and 0.25 feet of additional subsidence by 2040 (2.0 feet of cumulative subsidence). The SMCs were defined at 45 RMS in the Subbasin, and the GSAs will conduct monitoring to track progress towards sustainability. Additionally, as part of the 5-year update to the GSPs, the Subbasin Hydrogeologic Conceptual Model (HCM) will be reviewed and revised to incorporate new data, including Airborne Electromagnetic (AEM) survey data provided by DWR and data/results from the Subsidence Study prepared using Prop 68 grant funding. Additionally, the GSAs will continue work with USBR on revisions to the CVHM2 model for simulating groundwater extraction-subsidence interactions, to re-evaluate inelastic land subsidence SMC to consider new data and studies, and to assess allowable land subsidence on a Subbasin and localized (subbasin subarea) basis.

Table CC-21: Delta-Mendota Subbasin SMC for Inelastic Land Subsidence	
Definition of Undesirable Results	Changes in ground surface elevation that cause damage to critical infrastructure, including significant and unreasonable reductions of conveyance capacity, impacts to natural resource areas, or conditions that threaten public health and safety.
Definition of Significant and Unreasonable	<p>Significant and unreasonable damage to conveyance capacity from inelastic land subsidence is structural damage that creates an unmitigated and unmanageable reduction of design capacity or freeboard.</p> <p>Significant and unreasonable impacts to natural resource areas from inelastic land subsidence are unmitigated decreases in the ability to flood or drain such areas by gravity.</p> <p>Significant and unreasonable threats to public health and safety from inelastic land subsidence are those that cause an unmitigated reduction of freeboard that allows for flooding, or unmitigated damage to roads and bridges.</p>

Table CC-21: Delta-Mendota Subbasin SMC for Inelastic Land Subsidence	
Sustainability Goal	Minimize inelastic land subsidence by ramping down allowable subsidence caused by groundwater extraction in the Subbasin, with no additional subsidence after 2040. Work with neighboring Subbasins to address inelastic land subsidence caused by groundwater extraction outside of the Subbasin.
Minimum Threshold	At representative monitoring sites, the change in ground surface elevation that would cause undesirable results is up to 2 feet of additional inelastic land subsidence attributable to groundwater extraction in the Subbasin. Prevent subsidence caused by groundwater extractions in the Delta-Mendota Subbasin that exceeds corrective design standards or established triggers for critical infrastructure including the Delta-Mendota Canal, California Aqueduct, and roads and bridges.
Measurable Objective	Minimize inelastic land subsidence attributable to groundwater extraction within the Subbasin, with no additional subsidence after 2040.
5-Year Interim Milestones	<p>Year 5: Interim goal of no more than 1 foot of additional inelastic land subsidence attributable to groundwater extraction in the Subbasin during the first 5-year period of SGMA implementation. Review and revise Hydrogeologic Conceptual Model (HCM) to incorporate new data. Re-evaluate inelastic land subsidence SMC to consider new data and studies and to assess allowable land subsidence on a Subbasin and localized (subbasin subarea) basis. Gather data and complete the selection or establishment of representative monitoring sites (RMS) for land subsidence, with particular attention to the locations of critical infrastructure in the Subbasin, and in coordination with the Bureau of Reclamation and Department of Water Resources. Determine the relative proportion of subsidence caused by groundwater extraction within and outside the Subbasin for each RMS. Where subsidence is caused by pumping outside the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs.</p> <p>Year 10: Interim goal of no more than 0.5 feet of additional inelastic land subsidence attributable to groundwater extraction in the Subbasin during the second 5-year period of SGMA implementation, for a cumulative total of 1.5 feet in the first 10 years. Where subsidence is caused by groundwater extraction outside the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs. Continue work to improve understanding of interconnection between groundwater extractions and land subsidence, utilizing model simulations and/or data collection and analysis.</p> <p>Year 15: Interim goal of no more than 0.25 feet of additional inelastic land subsidence attributable to groundwater extraction in the Subbasin during the third 5-year period of SGMA implementation, for a cumulative total of 1.75 feet in the first 15 years. Where subsidence is caused by groundwater extraction outside the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs. Continue work to improve understanding of interconnection between groundwater extractions and land subsidence, utilizing model simulations and/or data collection and analysis.</p>

The numeric MTs and MOs by RMS are shown below in **Figure CC-69**, with the numeric SMC tabulated in **Table CC-22**.

Table CC-22: Numeric SMC for Inelastic Land Subsidence

DMS ID	GSP Region	Minimum Threshold (Inelastic Land Subsidence in ft Attributable to Groundwater Extraction)	Measurable Objective (Inelastic Land Subsidence in ft Attributable to Groundwater Extraction)
09-006	Aliso Water District	2	0
09-007	Aliso Water District	2	0
09-008	Aliso Water District	2	0
10-008	Farmers Water District	2	0
12-010	Fresno County	2	0
13-010	Fresno County	2	0
11-018	Grassland	2	0
11-019	Grassland	2	0
11-020	Grassland	2	0
01-009	NCDM	2	0
01-010	NCDM	2	0
01-011	NCDM	2	0
01-012	NCDM	2	0
01-013	NCDM	2	0
01-014	NCDM	2	0
01-015	NCDM	2	0
01-016	NCDM	2	0
01-017	NCDM	2	0
02-003	NCDM	2	0
02-004	NCDM	2	0
02-005	NCDM	2	0
02-006	NCDM	2	0
02-007	NCDM	2	0
02-008	NCDM	2	0
03-004	NCDM	2	0
03-005	NCDM	2	0
03-006	NCDM	2	0
04-003	NCDM	2	0
04-004	NCDM	2	0
04-005	NCDM	2	0
06-006	NCDM	2	0
07-019	NCDM	2	0
07-020	NCDM	2	0
07-021	NCDM	2	0
07-022	NCDM	2	0

DMS ID	GSP Region	Minimum Threshold (Inelastic Land Subsidence in ft Attributable to Groundwater Extraction)	Measurable Objective (Inelastic Land Subsidence in ft Attributable to Groundwater Extraction)
07-023	NCDM	2	0
07-024	NCDM	2	0
07-025	NCDM	2	0
07-026	NCDM	2	0
07-027	NCDM	2	0
14-014	SJREC	2	0
14-015	SJREC	2	0
14-016	SJREC	2	0
14-017	SJREC	2	0
14-018	SJREC	2	0

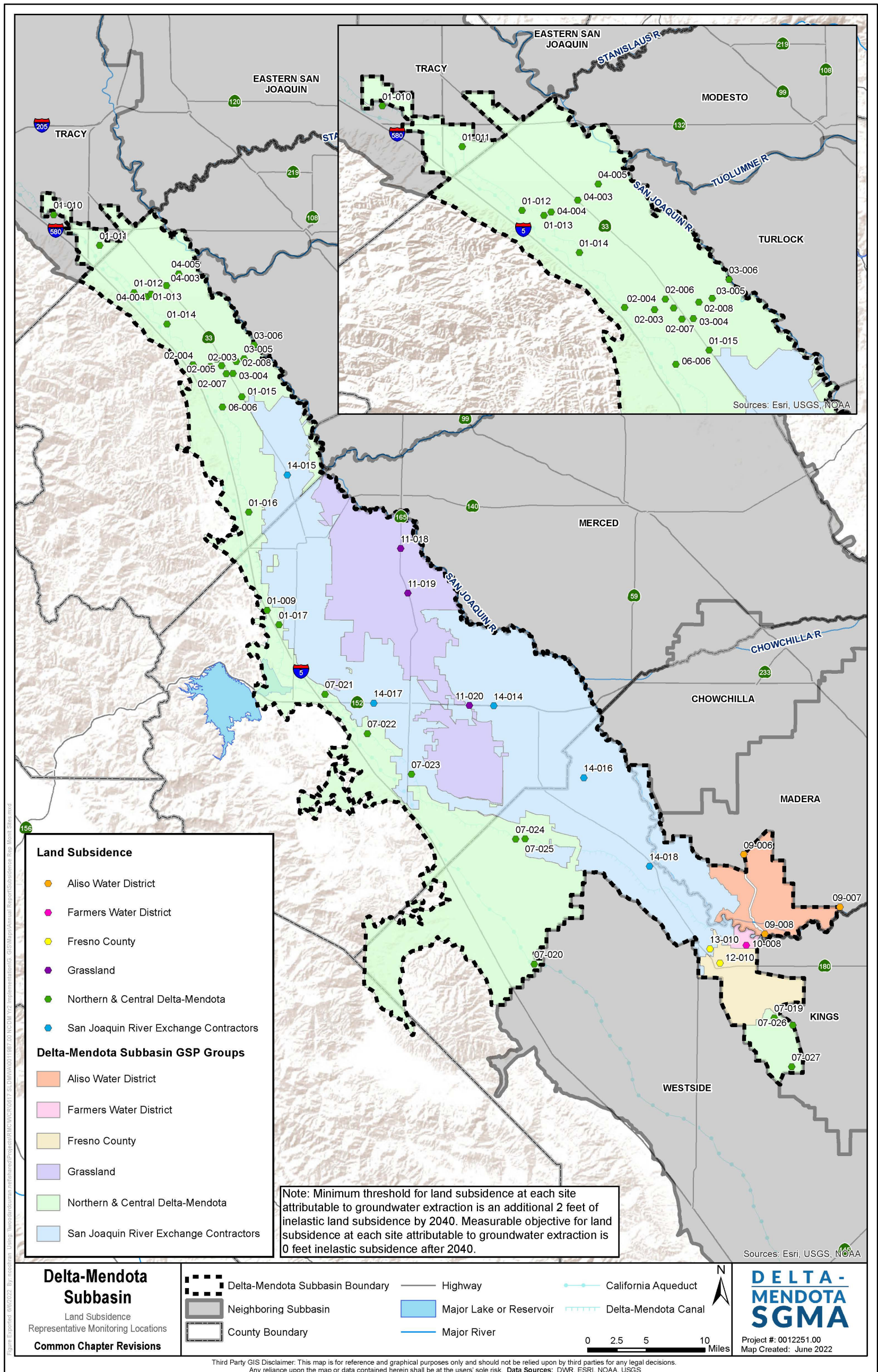


Figure CC-69: Land Subsidence Representative Monitoring Locations with SMC



5.4.5 Depletion of Interconnected Surface Water

The GSAs are committed to managing groundwater within the Subbasin to maintain interconnected surface waters comparable to existing conditions and prevent a trend of increasing interconnected surface water losses from the San Joaquin River. The GSAs will coordinate with neighboring subbasins to address interconnected surface water losses caused by groundwater management activities that occur outside of the Subbasin.

Presently, the Depletion of Interconnected Surface Water Sustainability Indicator is identified as a data gap within the Subbasin. Until the GSAs are able to collect the additional data necessary to set quantitative SMCs for this Sustainability Indicator, the SMCs for Chronic Lowering of Groundwater Levels serve as a proxy in the Upper Aquifer, pursuant to 23 CCR §354.28(d). Because the SMCs established for Chronic Lowering of Groundwater Levels are designed to maintain groundwater levels above historic low conditions, they are understood to be protective of the Depletion of Interconnected Surface Water Sustainability indicator and local natural resources and downstream beneficial uses and users. The RMS locations and frequency are consistent with that detailed in Section 6.

The GSAs plan to establish an Interconnected Surface Water monitoring network and develop SMCs as detailed in Table CC-18. By 2025, the GSAs anticipate completing an Interconnected Surface Water monitoring network that includes nine existing sites in the San Joaquin River Restoration Program and additional sites funded by the SGMA Implementation Grant award. The additional RMS will focus on the Northern & Central Delta-Mendota and Grassland GSP areas along the San Joaquin River. By 2030, the GSAs anticipate being able to gather and analyze data from these new RMS to estimate the influence of groundwater levels on gains and losses observed on the San Joaquin River. At this point, the Subbasin GSAs will establish Interconnected Surface Water SMCs as a rate or volume of surface water depletions that have adverse impacts on beneficial uses and users and may lead to undesirable results.

Table CC-23: Delta-Mendota Subbasin SMC for Depletions of Interconnected Surface Water	
Definition of Undesirable Results	Depletions of interconnected surface water as a direct result of groundwater pumping that cause significant and unreasonable impacts on natural resources or downstream beneficial uses and users.
Definition of Significant and Unreasonable	Significant and unreasonable impacts on natural resources or downstream beneficial uses and users of groundwater are a reduction in available surface water supplies for natural resource areas, and reductions in downstream water availability as a result of increased streamflow depletions along the San Joaquin River when compared to similar historic water year types.
Sustainability Goal	Maintain interconnected surface waters comparable to existing conditions (historic low conditions as of Water Year 2016) in order to prevent a trend of increasing interconnected surface water losses from the San Joaquin River. Work with neighboring Subbasins to address increased interconnected surface water losses caused by pumping outside of the Subbasin.
Minimum Threshold	Interconnected Surface Water is an identified data gap in the Delta-Mendota Subbasin. As an interim minimum threshold, use the Chronic Lowering of Groundwater Level Minimum Threshold as a proxy for impacts to interconnected surface waters (see below). The groundwater elevation indicating a chronic lowering of groundwater levels that may lead to undesirable results is an elevation that is lower than the historical seasonal low. The historic seasonal low is a fixed elevation at each



**Table CC-23: Delta-Mendota Subbasin SMC
for Depletions of Interconnected Surface Water**

	<p>site, based on available groundwater level data prior to the end of Water Year 2016. To account for future year-to-year variations in hydrology, compliance with the fixed historic seasonal low threshold will be compared with a 4-year rolling average of annual groundwater level measurements. Groundwater levels are measured as water surface elevation (WSE). Each GSP area includes multiple representative monitoring sites (RMS) to which the minimum threshold applies.</p> <p>For any RMS without data prior to Water Year 2016, Minimum Thresholds and acute thresholds will be established using the aforementioned methodologies and the data resulting from the first five years of monitoring following Water Year 2016 or following construction of the well.</p>
<p>Measurable Objective</p>	<p>Interconnected Surface Water is an identified data gap in the Subbasin. As an interim measurable objective, use the Chronic Lowering of Groundwater Level Measurable Objective as a proxy for interconnected surface waters (see below).</p> <p>Maintain seasonal high groundwater levels at an elevation that is at or above the Water Year 2015 seasonal high at representative monitoring sites in a GSP area. The Water Year 2015 seasonal high is a fixed elevation at each site, based on available groundwater level data. If data are unavailable for Water Year 2015 at a representative monitoring site, either a Water Year 2014 or Water Year 2016 Seasonal High will be used. To account for future year-to-year variations in hydrology, compliance with the fixed seasonal high threshold will be compared with a 4-year rolling average of annual groundwater level measurements. Groundwater levels are measured as water surface elevation (WSE). Each GSP area includes multiple representative monitoring sites (RMS) to which the measurable objective applies.</p> <p>For any RMS without data prior to Water Year 2016, Measurable Objectives will be established using the aforementioned methodology and the data resulting from the first five years of monitoring following Water Year 2016 or following the construction of the well.</p>
<p>5-Year Interim Milestones</p>	<p>Year 5: Fill data gaps, establish, and manage groundwater use to avoid the rate or volume of surface water depletions that have adverse impacts on beneficial uses and users and may lead to undesirable results.</p> <p>The Subbasin will complete a monitoring network of Interconnected Surface Water sites that will include six existing sites and datasets. GSP groups will complete the monitoring network with additional sites installed with SGMA Implementation Grant funding awarded to the Subbasin. The existing nine sites are part of the San Joaquin River Restoration Program and are located along the San Joaquin River at the southern end of the Subbasin. These nine sites, and the associated datasets, will continue to be utilized by the Subbasin as part of its monitoring network. Additional representative monitoring network sites for Interconnected Surface Water will focus on the Northern & Central Delta-Mendota and Grassland GSP areas along the San Joaquin River.</p> <p>Year 10: Gather and analyze data from Subbasin’s established representative monitoring network sites. Also gather and analyze available data in cooperation with neighboring subbasins, the U.S. Bureau of Reclamation’s San Joaquin River Restoration Program, the U.S. Geological Survey, and DWR’s California Data Exchange Center (CDEC), to estimate the influence of groundwater on gains and losses in the San Joaquin River. Establish minimum thresholds and</p>



Table CC-23: Delta-Mendota Subbasin SMC for Depletions of Interconnected Surface Water	
	<p>measurable objectives as a rate or volume of surface water depletions that have adverse impacts on beneficial uses and users and may lead to undesirable results.</p> <p>Year 15: Monitor and maintain interconnected surface waters in accordance with revised minimum thresholds and measurable objectives. Where increased interconnected surface water losses are caused by pumping outside of the Subbasin, seek remedies in coordination with the Department of Water Resources and neighboring GSAs.</p>

The RMN for this sustainability indicator is shown below in **Figure CC-70**. Please see **Table CC-17** for the numeric SMC associated with the Chronic Lowering of Groundwater Levels.

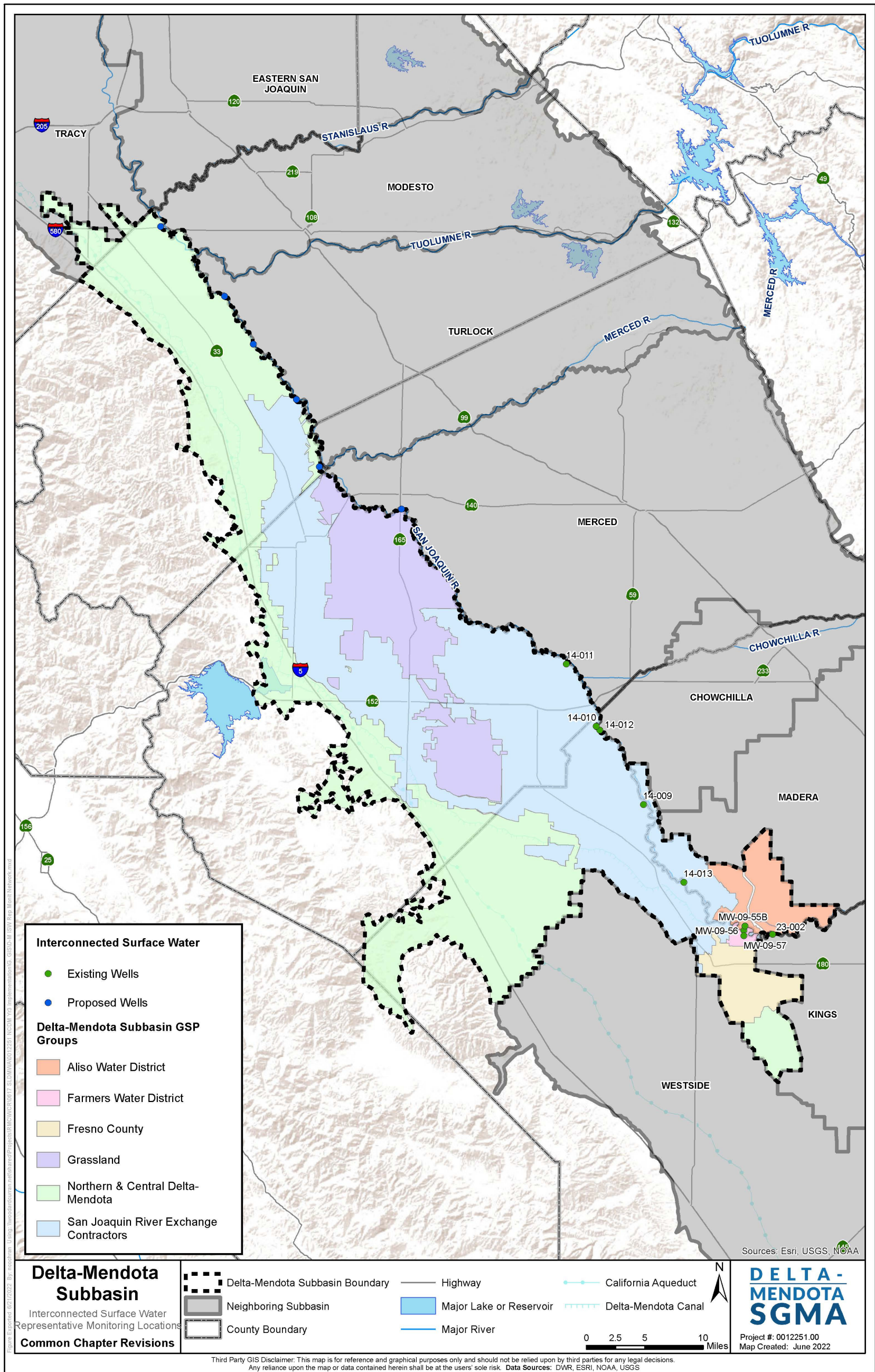


Figure CC-70: Interconnected Surface Water Representative Monitoring Locations with SMC

6. SUBBASIN MONITORING PROGRAM

As required by Subarticle 4. Monitoring Networks of the GSP regulations, the GSPs must include a monitoring network for each sustainability indicator, in addition to describing the monitoring protocols and data management to be followed in implementing the GSP monitoring program. Given the variability of conditions within the Delta-Mendota Subbasin, each GSP Group initially developed their individual monitoring networks, in coordination with their neighboring GSP Groups, such that the subbasin-wide monitoring program is simply a compilation of those coordinated individual monitoring networks. These representative monitoring networks were then re-evaluated as part of the update to the Subbasin GSP in 2022. Please see the individual GSPs for further discussion as to how the monitoring networks were developed.

The subbasin-wide monitoring networks presented herein are the representative monitoring networks for each of the applicable sustainability indicators, as defined according to the GSP Regulations § 354.36, *Representative Monitoring*. It is at the representative monitoring sites where each GSP Group has defined minimum thresholds, measurable objectives, and interim milestones to evaluate progress in achieving the Subbasin's sustainability goal by 2040. Data collected at the representative monitoring locations may be augmented with additional data, as available and appropriate, from other locations and/or publicly available datasets, in evaluating Subbasin conditions on an annual basis.

6.1.1 Coordinated Assumptions and Data

As previously noted, the required monitoring networks were initially developed at the GSP-level in order to appropriately capture the variability of hydrogeologic and water quality conditions in the Delta-Mendota Subbasin, and then re-evaluated at the Subbasin level to confirm that the monitoring networks meet the necessary requirements. All common coordinated assumptions agreed upon and implemented by each GSP Group in developing their respective monitoring networks are presented in Technical Memorandum 5 (*Assumptions for Delta-Mendota Subbasin Monitoring Network*) which is included in **Appendix B** of this Common Chapter.

6.1.2 Coordinated Monitoring Activities

All Delta-Mendota Subbasin GSP Groups have agreed to utilize the following monitoring protocols, data management, and roles and responsibilities for implementing and reporting from their respective monitoring plans under SGMA to ensure consistency in data collection, analysis and management allowing for subbasin-wide evaluation of groundwater conditions relative to the Subbasin sustainability goal, as defined and agreed upon by all GSP Groups.

Monitoring Protocols

Each GSP Group will utilize agreed-upon protocols, which may be the same as, or equal to, data collection protocols (i.e., industry standards and best management practices) to ensure the collection of comparable data using comparable methods. Additionally, the following minimum monitoring frequency for each applicable sustainability indicator was agreed upon by each GSP Group during the joint Delta-Mendota Subbasin Coordination Committee and Technical Working Group meeting on June 18, 2019:

- **Chronic lowering of groundwater levels/reduction in groundwater storage** - Twice per year, with seasonal high groundwater elevation data collected between February and April, and seasonal low groundwater elevation data collected between September and October. All measurements will be collected to a tenth of a foot.

- **Degraded water quality** – Once per year during irrigation season, typically between May and July.
- **Depletions of interconnected surface water** – Twice per year in conjunction with groundwater level monitoring.
- **Subsidence** – Publicly available subsidence data will be used along with locally-collected data. At a minimum, three data points will be collected within the first five years of GSP implementation, with a baseline value from 2019 or a date prior to that.

For non-monitored data to be reported as part of the annual reports (e.g., groundwater extractions, surface water deliveries), actual metered data will be used where such data exists, and when direct data do not exist, estimated quantities will be calculated based on existing indirect data (e.g., electrical usage, crop demand, ET) and/or other industry best practices. Additionally, where available and applicable, public datasets will be used to augment monitoring data collected by the Subbasin and analyzed on an annual basis.

Data Management

Each GSP Group will be responsible for conducting quality control reviews of data collected from the monitoring networks. As described in the Coordination Agreement, each GSP Group will exchange and share collected data in order to facilitate analysis and reporting at the Subbasin level. The Coordinated Data Management System (DMS) will be the primary vehicle by which data are shared amongst the GSP Groups, and it will be the responsibility of each GSP Group to conduct a quality control review of data entered into the DMS.

Roles and Responsibilities

It will be the responsibility of each GSP Group, and the GSAs included in that group, to conduct the monitoring program as agreed upon at the Subbasin level, for reviewing the data collected, and for ensuring that these data are available at the Subbasin level. **Figure CC-71** shows the general flow of data collected from the Delta-Mendota monitoring programs.

Figure CC-72 shows the roles and responsibilities of each GSA and GSP Group in the collecting, processing and reporting of data from the GSP monitoring networks. Additionally, it is the responsibility of each GSP Group, including their respective GSAs, to maintain the monitoring network and, as appropriate, revise and/or expand the monitoring networks to fill identified data gaps. Please see the individual GSPs for further information regarding data gaps and the GSAs plans for addressing those gaps.

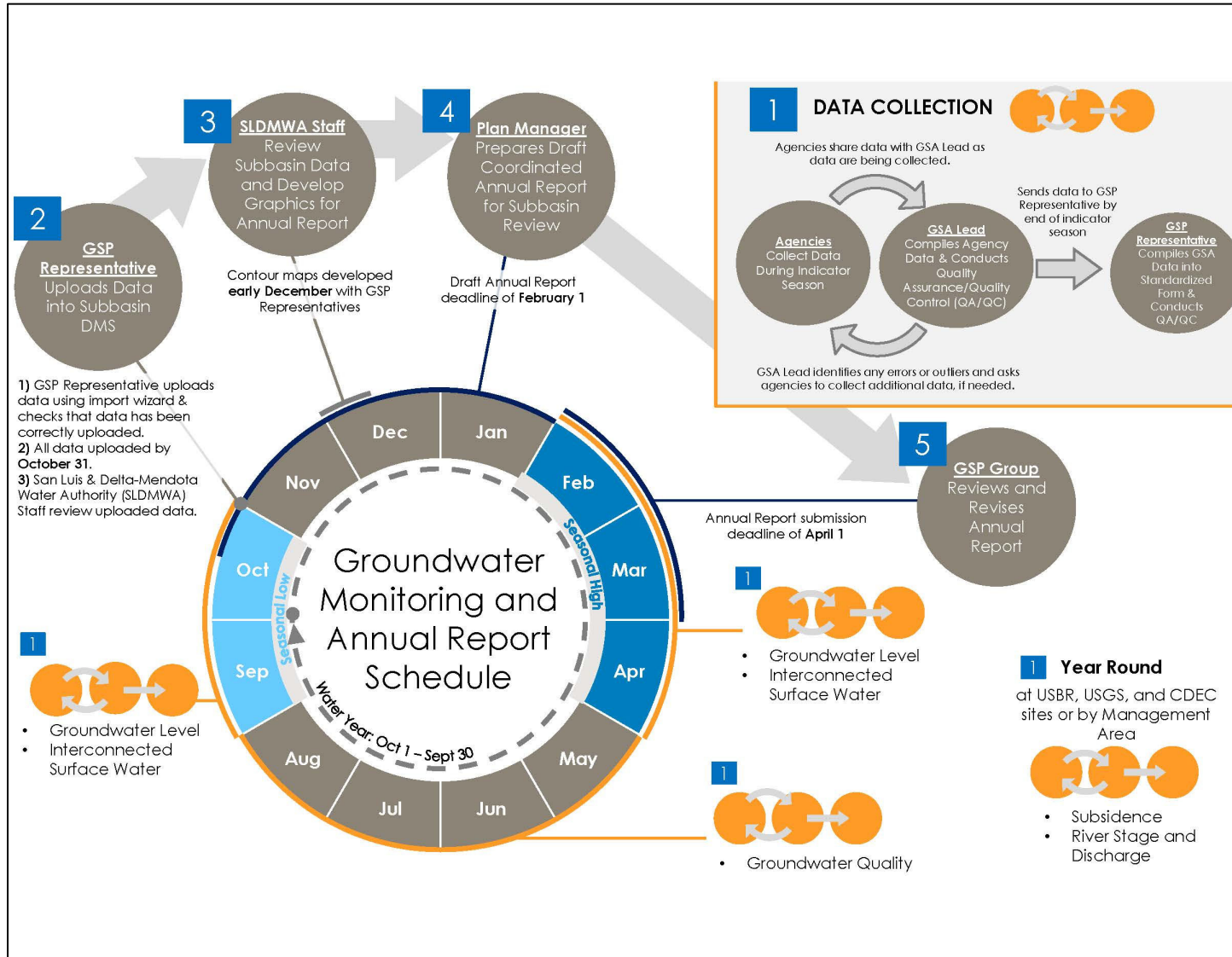


Figure CC-71: Data Flow in Delta-Mendota Subbasin

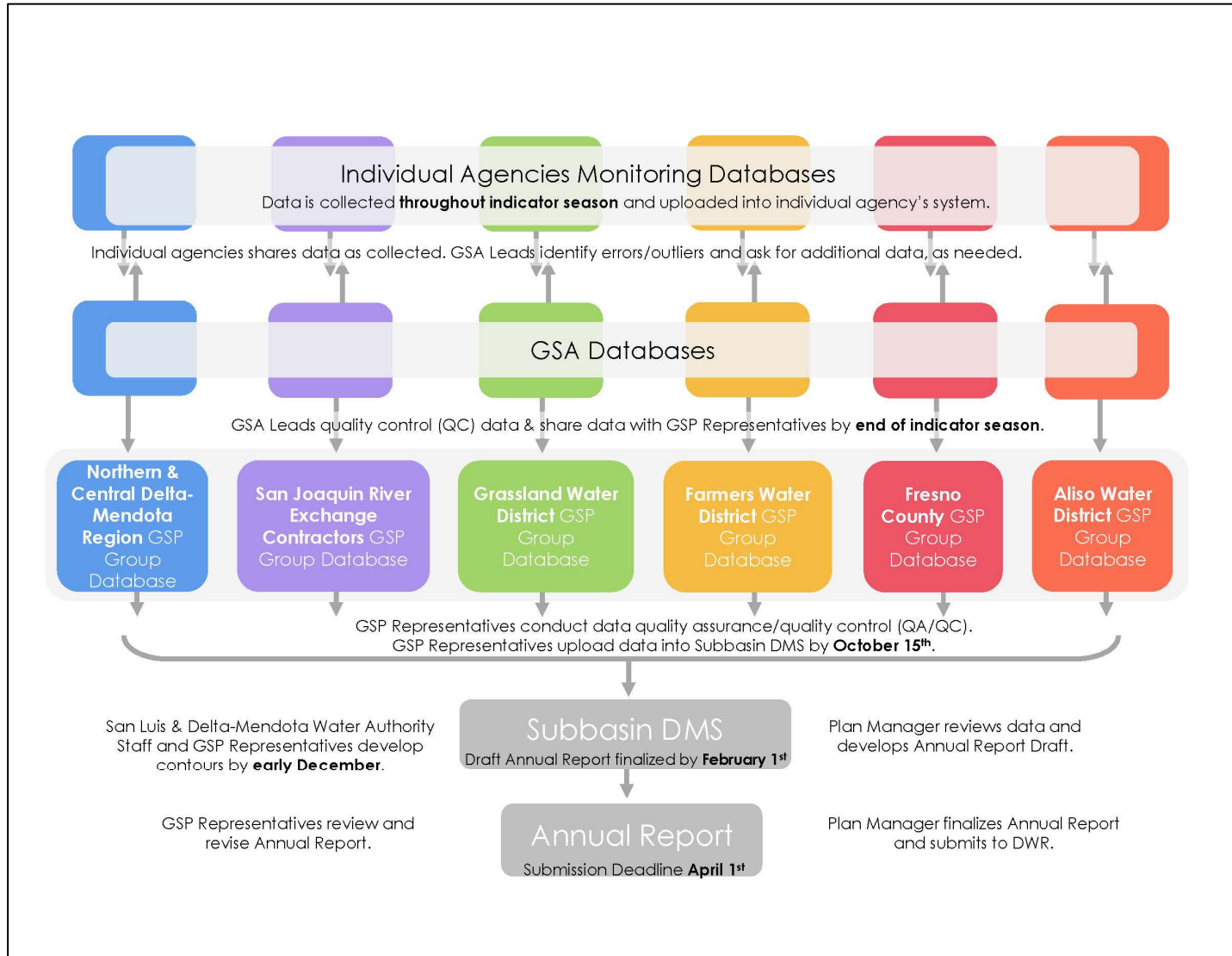


Figure CC-72: Delta-Mendota Monitoring and Data Management Roles and Responsibilities

6.1.3 GSP-Level Monitoring Networks

For more information on the individual GSP monitoring networks for each applicable sustainability indicator, including how the networks were developed, please refer to the individual GSPs. The monitoring networks for each applicable sustainability indicator for each GSP Group were developed in accordance with the GSP Regulations Article 5. Plan Contents, Subarticle 4. Monitoring Networks (§ 354.21 – 354.40). DWR’s Best Management Practices for the *Sustainable Management of Groundwater Monitoring Protocols, Standards, and Sites BMP* (2016b) and *Monitoring Networks and Identification of Data Gaps BMP* (2016a) documents were used when and where applicable at the discretion of each GSP group in developing monitoring networks and monitoring protocols.

6.1.4 Delta-Mendota Subbasin Monitoring Networks

The subbasin-level monitoring networks are a compilation of the representative monitoring networks developed by each individual GSP Group and reviewed and modified at the Subbasin level for consistency and appropriate coverage. The monitoring network for the chronic lowering of groundwater sustainability indicator is comprised of two parts, the Upper Aquifer (**Figure CC-73**) and Lower Aquifer (**Figure CC-74**). The monitoring networks for the reduction in groundwater storage for the Upper Aquifer and Lower Aquifer are the same as those utilized for the chronic lowering of groundwater levels. The monitoring network for the degraded water quality sustainability indicator is also comprised of two parts, the Upper Aquifer (**Figure CC-75**) and Lower Aquifer (**Figure CC-76**). Data gaps (areas without wells of known construction) are shown for the Upper Aquifer and Lower Aquifer for the chronic lowering of groundwater and degraded water quality sustainability indicator. The interconnected surface water monitoring network for the Delta-Mendota Subbasin is shown in **Figure CC-77**, and the monitoring network for land subsidence for the Delta-Mendota Subbasin is shown in **Figure CC-78**.

The Delta-Mendota Subbasin representative monitoring networks will be periodically reviewed and revised, as appropriate, by the GSP Groups responsible for maintaining them and coordinated at the Subbasin level. Revised monitoring networks will be included in the five-year updates to the GSPs.

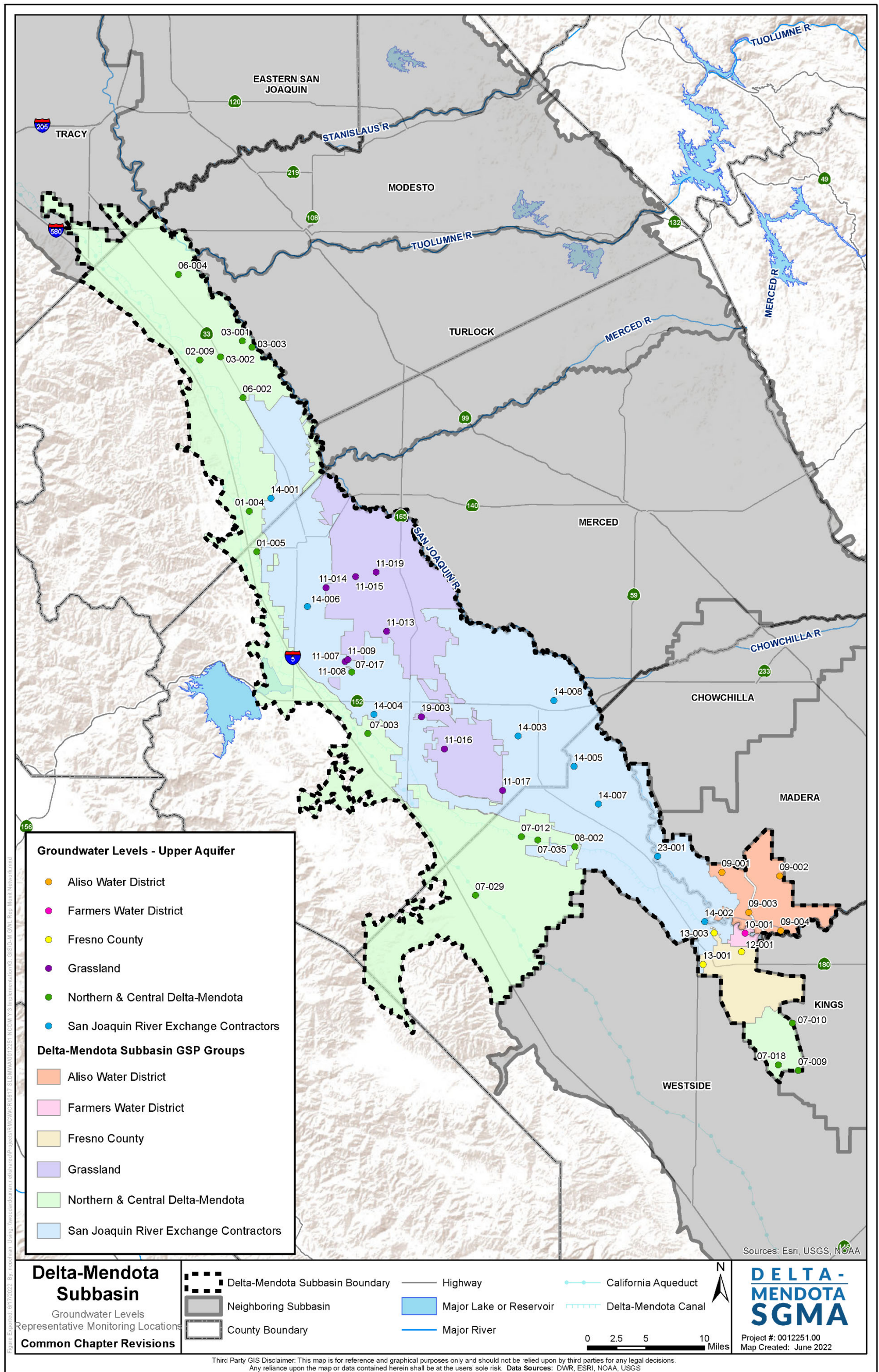


Figure CC-73: Upper Aquifer Groundwater Level Monitoring Network

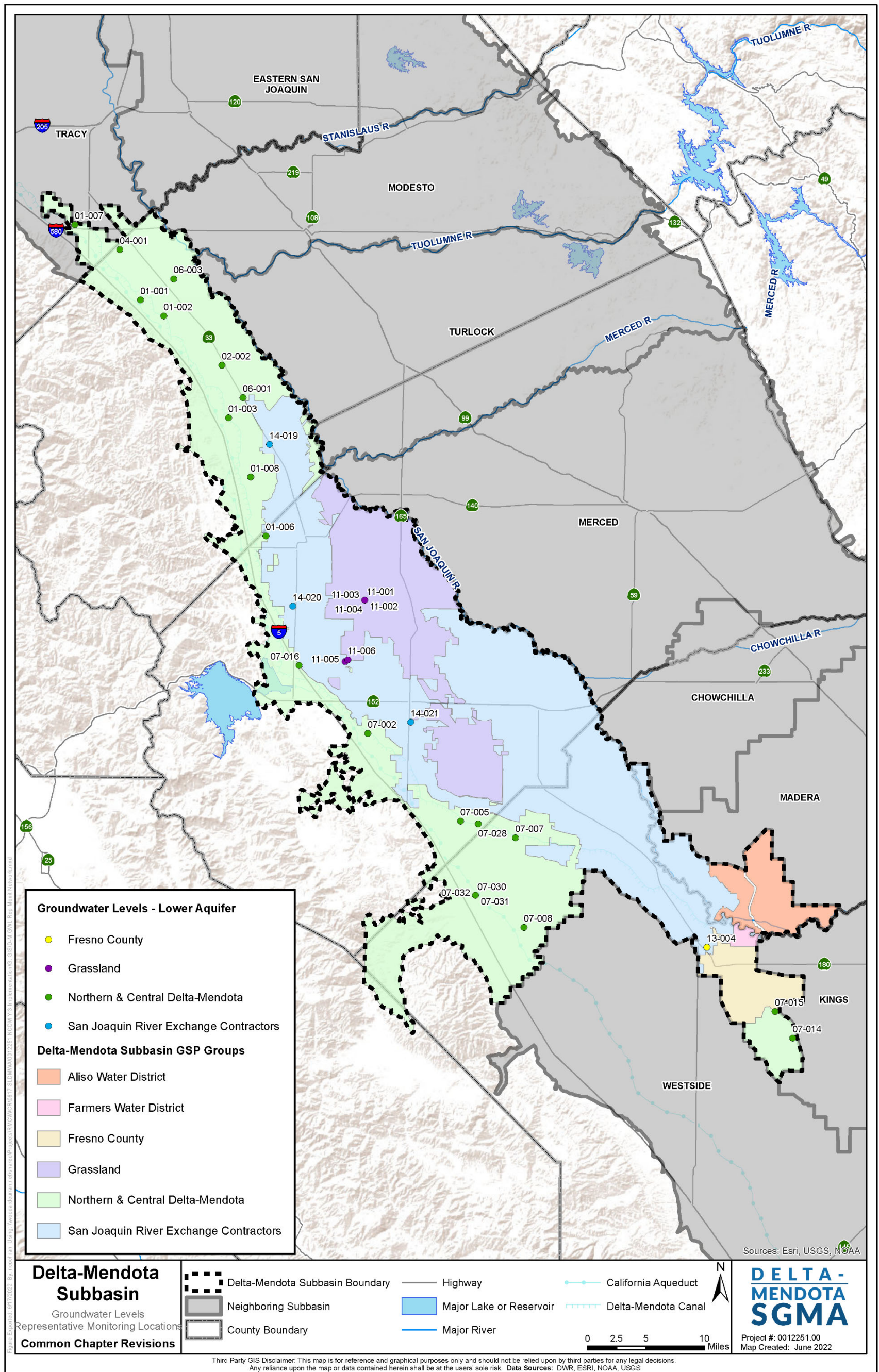


Figure CC-74: Lower Aquifer Groundwater Level Monitoring Network

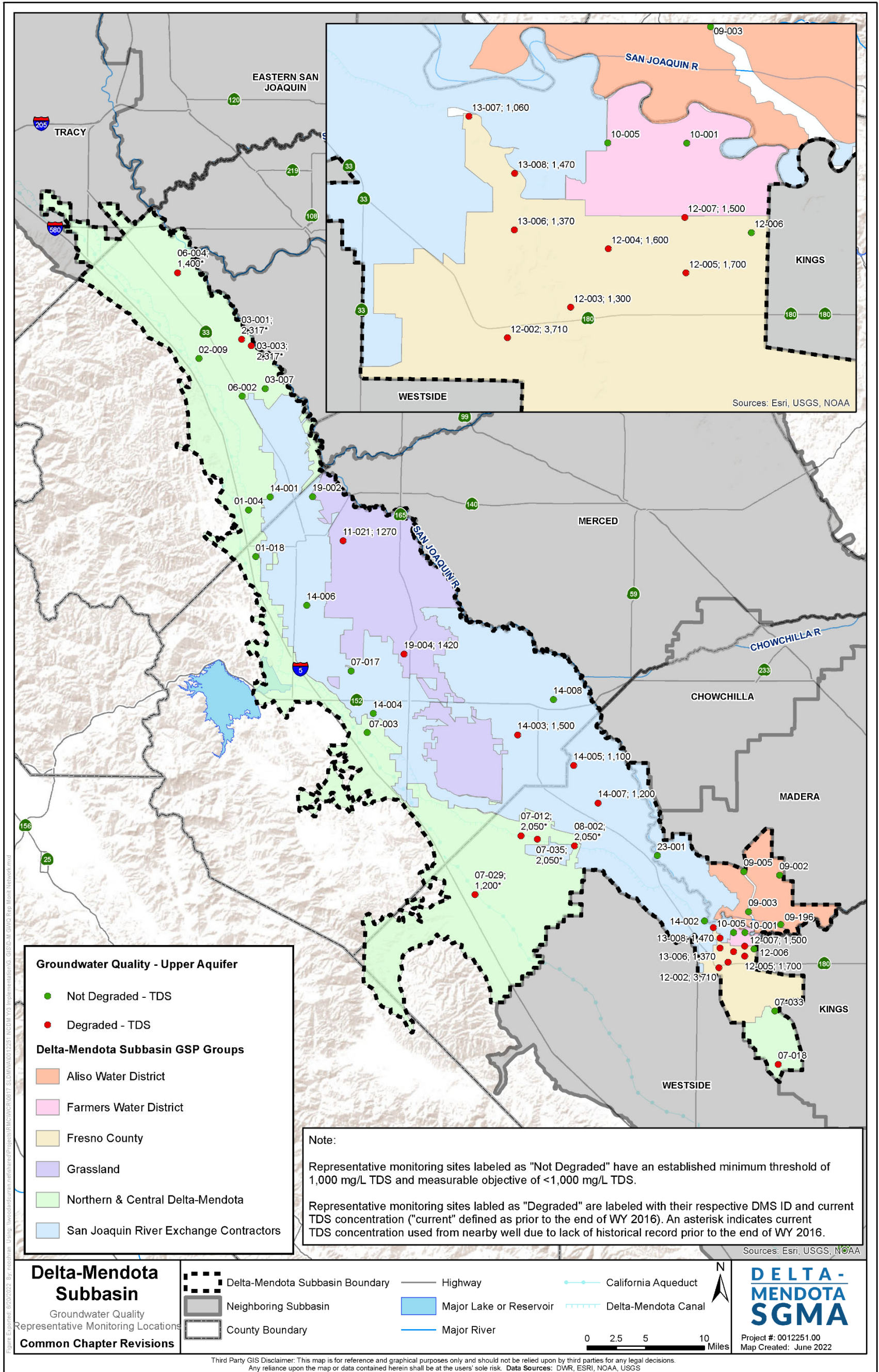


Figure CC-75: Upper Aquifer Groundwater Quality Monitoring Network

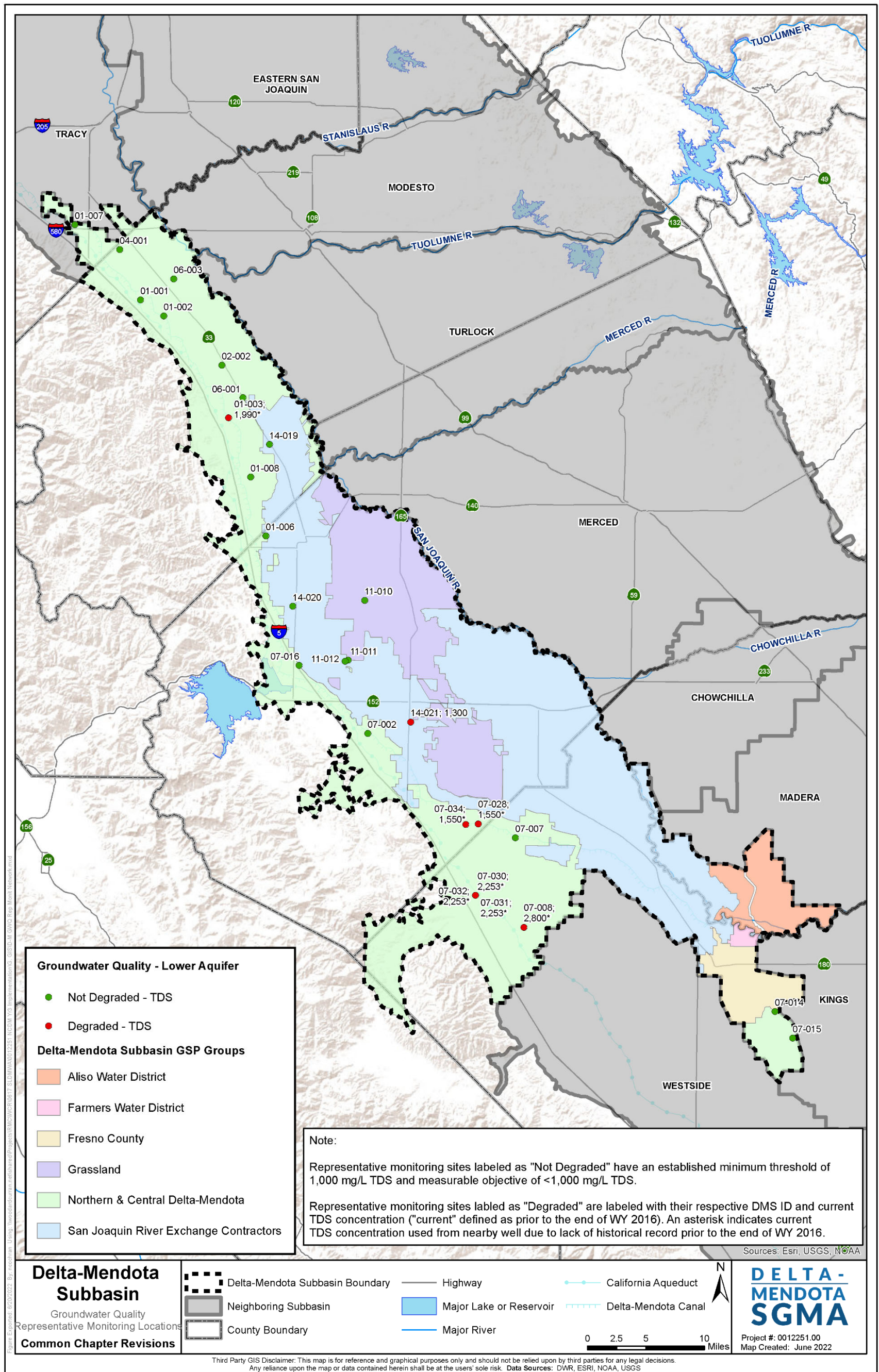


Figure CC-76: Lower Aquifer Groundwater Quality Monitoring Network

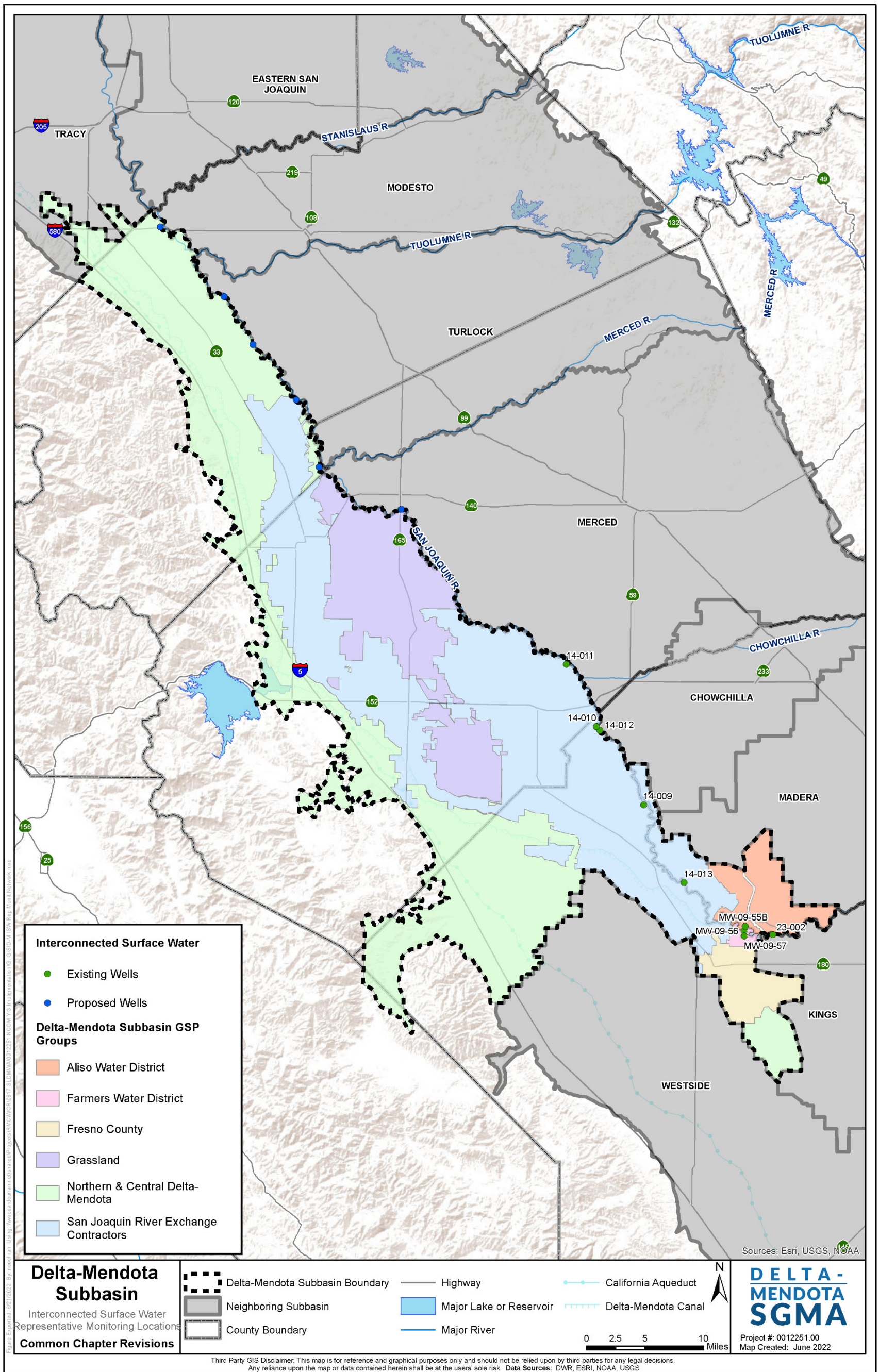


Figure CC-77: Interconnected Surface Water Monitoring Network

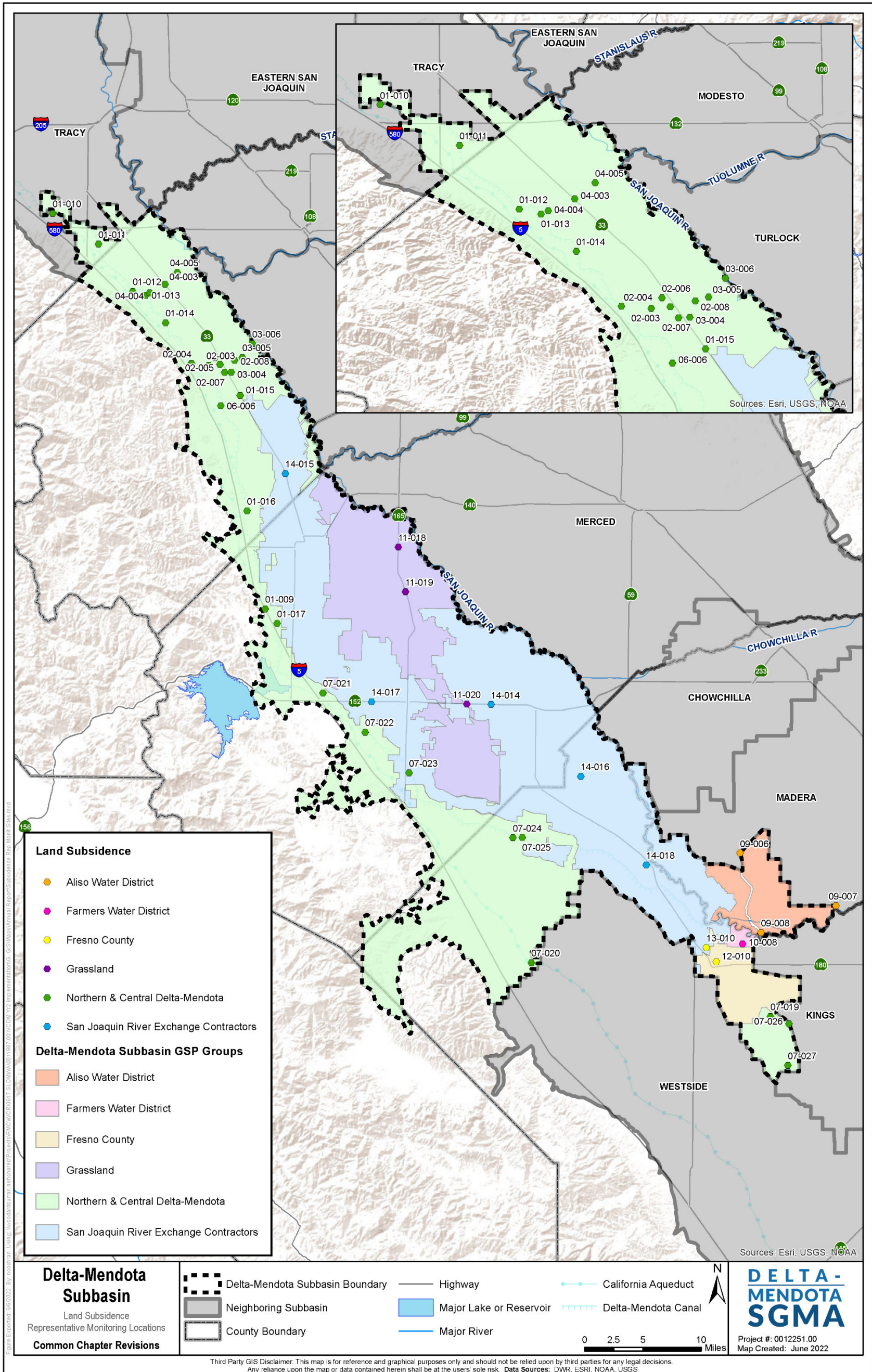


Figure CC-78: Land Surface Elevation Monitoring Network

7. SUBBASIN DATA COLLECTION AND MANAGEMENT

As required in §352.6, Data Management System of the GSP regulations, each GSA is required to develop and maintain a data management system (DMS) that is capable of storing and reporting information relevant to the development or implementation of the GSP(s). Additionally, per §354.4, Reporting Monitoring Data to the Department, all monitoring data is to be stored in a DMS with copies of the monitoring data included in the annual report and submitted electronically on forms provided by DWR. Recognizing that GSP implementation, including annual reporting, will require some efforts at the subbasin level, the 23 GSAs overlying the Delta-Mendota Subbasin have chosen to develop a coordinated DMS that can be utilized by each GSP Group for management of their data, but which will allow for the required compendium of data sets for preparation of Subbasin annual reports. The coordinated DMS will also provide a generic framework that can be used by any GSP Group or GSA in the Subbasin for individual data management while allowing for consistent formatting and the simplified uploading of compiled datasets into the Subbasin-wide coordinated DMS.

The individual GSP Groups have also developed and will maintain separate data storage processes or DMSs. Each separate DMS developed for each GSP will store information related to implementation of each individual GSP, monitoring network data and monitoring sites requirements, and water budget data requirements. Each system will be capable of reporting all pertinent information to the respective GSA and/or GSP Group, and ultimately to the Coordination Committee. After providing the Coordination Committee with data from the individual GSPs, the Subbasin Plan Manager and Coordination Committee will ensure the data are stored and managed in a coordinated manner throughout the Subbasin and reported to DWR on an annual basis.

The DMS constructed for the Delta-Mendota Subbasin is a secured web-based application hosted on Amazon Web Services (AWS). The DMS focuses on five core business requirements including: centralized data warehouse, security of data, permissioned based access, data visualization and reporting. Other goals of the DMS focus around improving data collection/aggregation processes, creating data standards, gaining efficiencies in reporting and improving data sharing with stakeholders. The DMS is designed to aggregate data through import processes by GSP to support data visualization and annual report generation.

Underlying the web application is a relationship database used to store the information aggregated from GSPs across primary data types identified to support monitoring and Annual Report development. Those data types include groundwater extractions, surface water deliveries, groundwater storage, groundwater elevations, groundwater quality, interconnected surface water and land subsidence. The web application functionality includes an embedded GIS viewer, screens to view tables of time series data, and charting capabilities for hydrographs. The embedded GIS viewer contains functionality to store map layers such as reference data, GSA/GSP boundaries and derived information such as water level contours.

Section 6.1.2 describes the process by which monitoring data are collected by each GSP Group and processed for inclusion in the Coordinated DMS. In order to be able to track data by location in the Subbasin, each monitoring locations in the Delta-Mendota Subbasin is assigned a unique identifier in the DMS. The number system is in a format of ##-####, where the first two digits indicates which GSA the monitoring location is associated with, the subsequent four digits indicate which specific monitoring

location in that GSA area. As shown in **Figure CC-72**, the general methodology agreed upon for data import and management is as follows:

- Each GSA collects their respective data per agreed-upon monitoring protocols and transmits it to the GSA Representative.
- Each GSA Representative then compiles the data and conducts a quality control check.
- The GSA Representative then transmits the compiled data set to the GSP Lead or Representative, who then aggregates the data from all GSAs and conducts a second quality control check.
- The GSP Lead or Representative then uploads the data set into the DMS using import wizards designed specifically for this process.
- The Subbasin Plan Manager then uses the data in the DMS to compile information as required for the annual report.

Compiled data sets from the DMS are then augmented with required maps generated externally to produce the required annual report. Mapping prepared outside the DMS are subsequently imported into the DMS as GIS files to ensure all data are kept in one place and to allow for access by GSAs and other Subbasin stakeholders.

The DMS will be maintained by the San Luis & Delta-Mendota Water Authority, while acting as the Plan Manager, with a contract with the software vendor for hosting, maintenance and future maintenance. Each GSP will pay a maintenance fee for the continued hosting and support of the Subbasin coordinated DMS.

The Coordinated DMS as described herein may be supplemented by additional DMS developed and maintained by each GSP Group in the Subbasin. The reader is referred to each of the six Subbasin GSPs for specific information relative to data collection and management in each GSP Plan area.

8. STAKEHOLDER OUTREACH

California Code of Regulations, Title 23, §354.10 identifies the requirements for notice and communication information presented in a GSP, which includes:

- A summary of information relating to notification and communication by the GSAs with other agencies and interested parties;
- A description of the beneficial uses and users of groundwater in the basin, including the land uses and property interests potentially affected by the use of groundwater in the basin, the types of parties representing those interests, and the nature of consultation with those parties;
- A list of public meetings at which the GSP was discussed or considered by the GSAs;
- Comments regarding the GSP received by the GSAs and a summary of any responses by the GSAs;
- A communication section of the GSP that includes an explanation of the GSAs' decision-making process, identification of opportunities for public engagement, a discussion of how public input and response was used, a description of how the GSAs encouraged the active involvement of diverse social, cultural and economic elements of the population within the basin, and the methods used by the GSAs to inform the public about progress implementing the GSP, including the status of projects and actions.

In meeting these requirements, outreach and educational activities were conducted at the Subbasin, GSP and GSA level throughout the GSP development process. This section describes the noticing and outreach conducted at the Delta-Mendota Subbasin level for GSP development. Please refer to each individual Subbasin GSP for specific details regarding noticing and communication, and descriptions of the beneficial uses and users of groundwater at the GSP and GSA level. Information regarding Subbasin coordination and committees can be found in Section 2, Delta-Mendota Subbasin Governance, of this document.

8.1 Situation Assessment and Communications Plan

To assist in GSA formation and GSP development, agencies in the Delta-Mendota Subbasin sought and received Facilitation Support Services funding from DWR in August 2016. Under this funding, a neutral, third-party facilitation team conducted a situation assessment on behalf of the Subbasin GSAs. The purpose of the assessment was to understand how stakeholders perceived the status of the Subbasin's groundwater resources and identify potential barriers to the successful development of the GSPs. The facilitation team, with input from local agencies, identified 30 stakeholders representing diverse interests and beneficial users in the Subbasin, together with disadvantaged communities, agricultural well owners, government and land use agencies, and environmental and ecosystem interests. From February 2017 to May 2017, the facilitators conducted over 30 phone and in-person interviews with stakeholders. The facilitators recorded the interview responses and summarized the results in a presentation made to the GSA representatives.

The assessment results were used to inform the development of the Delta-Mendota Subbasin Sustainable Groundwater Management Act Communications Plan (Communications Plan), which is provided with this document as **Appendix E**. The Communications Plan identifies near- and long-term outreach and engagement strategies, tactics, and tools for stakeholder engagement in GSP development and

implementation. The Subbasin GSAs used the Communications Plan as a framework for conducting the stakeholder outreach and engagement activities described in this document.

The Delta-Mendota Subbasin is home to a large Hispanic or Latino population with many using Spanish as their primary language. As such, public noticing, educational materials and other outreach efforts were developed and presented in both English and Spanish throughout the GSP development process.

8.2 Public Noticing and Information

The Delta-Mendota Subbasin GSAs developed and used several coordinated tools, in addition to their own resources to inform members of the public about GSP development activities and promote opportunities for public engagement. These tools are described below.

- **Website:** The Subbasin website – www.deltamendota.org – is the primary location for information related to SGMA implementation in the Subbasin. Information provided on the website includes: an overview of SGMA, a description of each of the GSP groups, contact information for each of the GSAs, and upcoming workshops and public meetings. The website also serves as a repository for outreach collateral, workshop materials, and meeting packets and minutes for the Delta-Mendota Subbasin Coordination Committee, Technical Working Group, and Communications Working Group (described below), and provides links to the individual GSP websites maintained by each GSP Group.
- **Delta-Mendota Subbasin Newsletter:** The Delta-Mendota Subbasin Newsletter is distributed on a monthly basis and serves as an informational tool to keep interested parties, beneficial users, and members of the general public informed about the development and status of the GSPs. Newsletter topics include Subbasin-wide activities, general announcements, upcoming meetings and workshops, and past and upcoming GSP development activities. Copies of the newsletters are archived on the Subbasin website.
- **Informational Materials:** GSAs in the Subbasin developed a suite of materials in English and Spanish to educate and inform members of the public about SGMA and topics covered in the GSP. These materials include bilingual presentations, fact sheets, handouts, frequently asked questions, and videos. Copies of the materials are available on the Subbasin website. GSA representatives distributed these materials before and during meetings, workshops, and other outreach activities.

8.3 List of Public Meetings Where the GSPs were Discussed

Each GSP Group for the Delta-Mendota Subbasin has conducted individual outreach efforts relative to their own GSP Plan area in addition to those same efforts at the subbasin-level. Please refer to each of the individual GSPs for this information. Below is a list of the coordinated public workshops and meetings where the GSPs were discussed. These include meetings of the Delta-Mendota Subbasin Coordination Committee, the two Subbasin Working Groups and coordinated public workshops. All meetings were publicly noticed and held from June 2017 through July 2019. Meeting agenda, minutes and handouts are available on the Delta-Mendota Subbasin website at www.deltamendota.org.



Delta-Mendota Coordination Committee Meetings

The Delta-Mendota Subbasin Coordination Committee meets on the second Monday of each month at 9:30 am at the SLDMWA Administration Offices located at 842 6th Street, Los Banos, California. These meetings are noticed as required under the Brown Act and are open to the public.

In addition to the monthly meetings, a special meeting of the Coordination Committee was held on March 8, 2019 to discuss sustainable yield estimation methodologies.

Delta-Mendota Technical Working Group Meetings

The Delta-Mendota Technical Working Group meets on the third Tuesday of each month at 10:00 am at the SLDMWA Administration Offices located at 842 6th Street, Los Banos, California. These meetings are noticed as required under the Brown Act and are open to the public.

In addition to the monthly meetings, several special meetings of the Technical Working Group were held to discuss specific topics. These additional meetings were as follows:

- August 24, 2018 and September 19, 2018 meetings to discuss Groundwater Dependent Ecosystems
- August 8, 2018, October 30, 2018 and December 19, 2018 meetings to discuss water budgets

Delta-Mendota Communication Working Group Meetings

The Delta-Mendota Communications Working Group meets on the fourth Tuesday of each month at 1:00 pm. These meetings typically conducted via conference call. Meeting information for this working group is available on the Delta-Mendota Subbasin website.

Coordinated Public Workshops

Coordinated public workshops were held for the Delta-Mendota Subbasin shown in the table below. All workshops were advertised and conducted in both English and Spanish.

Table CC-24: Coordinated Public Workshops

Date	Location, Venue	Topic
Spring 2018 Workshops		
May 14, 2018	Los Banos, San Luis & Delta Mendota Water Authority	<ul style="list-style-type: none"> • Sustainable Groundwater Management Act overview
May 16, 2018	Patterson, Hammon Senior Center	<ul style="list-style-type: none"> • Delta-Mendota Subbasin overview
May 17, 2018	Mendota, Mendota Library	<ul style="list-style-type: none"> • Opportunities for engagement
Fall 2018 Workshops		
October 22, 2018	Firebaugh, Firebaugh Middle School	<ul style="list-style-type: none"> • GSP development and implementation process
October 24, 2018	Los Banos, College Greens Building	<ul style="list-style-type: none"> • Data collection
October 25, 2018	Patterson, Hammon Senior Center	<ul style="list-style-type: none"> • Hydrogeologic Conceptual Model • Numerical and analytical models • Water budgets
Winter 2019 Workshops		
February 19, 2019	Los Banos, College Greens Building	<ul style="list-style-type: none"> • Historic and current water budgets
February 20, 2019	Patterson, Patterson City Hall	



Date	Location, Venue	Topic
March 4, 2019	Santa Nella, Romero Elementary School	<ul style="list-style-type: none"> • Sustainability criteria • Undesirable results • Projects and management actions
Spring 2019 Workshops		
May 20, 2019	Patterson, Patterson City Hall	<ul style="list-style-type: none"> • Projected water budgets • Sustainable yield • Groundwater monitoring networks • Projects and management actions
May 21, 2019	Los Banos, College Greens Building	
May 22, 2019	Santa Nella, Romero Elementary School	
May 23, 2019	Mendota, Mendota Library	

Please see **Appendix F** for summaries of the coordinated public workshops, and **Appendix G** for example promotional materials for the public workshops.

8.4 Comments Regarding the GSPs

Key components of the six Subbasin GSPs were presented at the public workshops conducted throughout the GSP development process. **Appendix F** contains summaries of the coordinated public workshops, including comments received from and feedback provided to workshop participants. Additionally, each of the GSP Groups in the Delta-Mendota Subbasin are individually responsible for the public review of their plans and for addressing any public comments received. Please see the individual GSPs for additional information regarding plan review.

8.5 Subbasin Decision Making Process

The Delta-Mendota Subbasin Coordination Agreement outlines the responsibilities of all Subbasin parties, including decision making protocols and voting structure. These are further discussed in Chapter 2 of this document.

During the GSP development process, the Technical Working Group was charged with coordinating implementation of the required technical elements of the GSP (e.g., water budgets, monitoring networks), and to provide recommendations to the Delta-Mendota Subbasin Coordination Committee. Similarly, the Communications Working Group was charged with implementing the Subbasin Communications Plan and with providing recommendations for workshops and other outreach activities to the Coordination Committee. The Coordination Committee took actions and approved recommendations and work products and provided direction to both working groups and other ad hoc committees.

In general, the coordinated decision-making process included developing agendas for each meeting of the Delta-Mendota Subbasin Coordination Committee and for each Working Group meeting. The agendas were developed in concert with the Technical and Communications Working Groups, and the respective representatives of each GSP Group. Agenda items were either educational, informational, or required direction or decision. Meeting agendas, meetings minutes and handouts have been posted on the Delta-Mendota Subbasin website for public access.

8.6 Opportunities for Public Engagement and How Public Input was Used

Community input was encouraged and received at all meetings of the Coordination Committee, Technical Working Group, Communications Working Group meetings and at the public workshops. The Subbasin GSPs (and therefore, this Common Chapter) was shaped by community input, Working Group input, and Coordination Committee direction and decisions.

8.6.1 Opportunities for Public Engagement

Regular opportunities for public engagement were available throughout GSP development. The Coordination Committee, Technical and Communications Working Groups, and individual GSA staff encouraged public input throughout the development of the GSPs as described below. A list of stakeholder and community organizations contacted as part of the Subbasin coordinated outreach efforts is included in **Appendix H**.

Meetings and Direct Engagement

Open meetings and public workshops were held as described in Section 8.1. In addition, GSA staff made direct contact with community representatives to encourage their participation in the GSP development process. GSA representatives provided their contact information by phone, email, or mail both online (on the Subbasin website) and at workshops for stakeholder questions and comments.

Targeted Stakeholder Engagement

The Subbasin GSAs also conducted targeted outreach and engagement to hard-to-reach communities, interested parties, and stakeholders that were previously underrepresented in other engagement activities. This included outreach to the following stakeholder types:

- **Agricultural Interests:** Agricultural stakeholders in the Subbasin include agricultural well operators, growers, ranchers, farmworkers, and agricultural landowners. Strong agricultural representation exists within the leadership of the GSAs. To augment direct outreach being conducted by individuals GSAs, Subbasin representatives also coordinated closely with local county farm bureaus to disseminate information related to GSP development and public workshops.
- **School Districts:** Schools districts are considered for both beneficial users of groundwater (for drinking water), as well communication channels to disseminate information about SGMA and GSP development. GSA representatives directly contacted local school districts to notify them of the public workshops. Some schools also help distributed informational materials and workshop flyers to their students and parents.
- **Industrial Interests:** There are many industrial interested in the Subbasin, including packaging and processing plants, mining industries, and other similar facilities that use groundwater in some fashion. The GSP Groups have identified these interests within their respective Plan areas and have disseminated information related to GSP development during individual outreach efforts.
- **Environmental/Conservation Interests:** Environmental and conservation interests in the Subbasin have been contacted and communicated with during GSP development. Specific related interest groups contacted during GSP development include The Nature Conservancy, the California Department of Fish and Wildlife, Audubon, and various sportsman clubs and wetland managers.

- **Disadvantaged Communities:** The GSAs followed best practices identified in Collaborating for Success: Stakeholder Engagement for Sustainable Groundwater Management Act Implementation (Community Water Center, 2015) and other guidance documents to engage disadvantaged and severely disadvantaged communities. This included holding meetings in disadvantaged communities; holding meetings in the evening at known local venues, such as schools, civic centers, and community centers; translating fact sheets, meeting materials, and presentations into other languages; and providing interpreting services at all public workshops.
- **Other Interests:** Other potential groundwater users in the Subbasin (or those with groundwater-related interests) contacted during GSP development included the various counties in which the Delta-Mendota Subbasin lie and/or are adjoining (including San Joaquin County and San Benito County), Caltrans, the DWR State Water Project Division of Operations and Maintenance, the U.S. Bureau of Reclamation, the U.S. Geological Survey and the San Joaquin River Restoration Program.

The Reader should refer to each individual GSP for a more complete description of GSP-specific meetings and direct engagement.

GSP Section Review and Comment Periods

Each GSP Group was responsible for coordinating the individual review of their GSP. Please see each GSP for additional information as to their specific public review process. This Common Chapter to the six Delta-Mendota Subbasin GSPs was posted on the Subbasin's website (www.deltamendota.org) following submittal of the Subbasin GSPs.

8.6.2 How Public Input and Response was Used in the Development of the GSP

Each GSP Group was responsible for coordinating the individual review of their GSP and for determining how to incorporate public input and responses into their respective plans. Public input to the GSPs was solicited through the GSP development process through a number of means, including coordinated public workshops, Board of Directors presentations, City Council presentations, and growers' meetings. Please see the individual GSPs for more information regarding GSP-specific outreach efforts and how stakeholder and public input was received and factored into the GSPs.

8.7 Revisions to Common Chapter and Subbasin GSPs

As previously noted in this document, the Delta-Mendota Subbasin received a Consultation Initiation Letter on January 21, 2022 from DWR. The CIL identified four potential deficiencies across the six Subbasin GSPs which may preclude DWR's approval, as well as potential corrective actions to address each potential deficiency. The CIL thus initiated consultation between DWR, the Basin Manager, Plan Managers, and the Subbasin's 23 Groundwater Sustainability Agencies (GSAs) on February 18, 2022 regarding the amount of time needed to address the potential deficiencies and corrective actions. Subsequent meetings were held on March 7, March 30, April 19, May 24, and June 20 2022 to discuss the Subbasin's proposed approach to addressing the identified deficiencies.

The four deficiencies identified in DWR's CIL are summarized as follows:

Potential Deficiency 1: The GSPs do not use the same data and methodologies.

Potential Deficiency 2: The GSPs have not established common definitions of undesirable results in the Subbasin.

Potential Deficiency 3: The GSPs in the Subbasin have not set sustainable management criteria in accordance with GSP regulations.

Potential Deficiency 4: The management areas established in the Plan have not sufficiently addressed the requirements specified in 23 CCR §354.20.

This revised Common Chapter, and associated revisions to the six Subbasin GSPs, have been prepared in response to the deficiencies identified in the CIL based on direction provided by the Delta-Mendota Subbasin Coordination Committee, the Delta-Mendota Technical Working Group, the Subbasin GSAs and DWR. It is intended to document how the deficiencies identified in the CIL were addressed in the revised GSPs and associated Common Chapter, and where those revisions are addressed in the Common Chapter.

A Notice of Intent to Adopt the revised Common Chapter and six Subbasin GSPs (known as the Amended Groundwater Sustainability Plan) was distributed on March 15, 2022. Public meetings for the adoption of the Common Chapter and Subbasin GSPs were held in June and July of 2022; please see the Subbasin's website (www.deltamendota.org) for the respective dates for each GSAs meeting and adoption.

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DELTA - MENDOTA SGMA

Common Chapter - Appendices

For the Delta-Mendota Subbasin Groundwater Sustainability Plan

August 2019



Appendix A - Coordination Agreement



DELTA-MENDOTA SUBBASIN COORDINATION AGREEMENT

THIS DELTA-MENDOTA SUBBASIN COORDINATION AGREEMENT is made effective as of December 12, 2018 by and among the groundwater sustainability agencies within the Delta-Mendota Subbasin (each a “**Party**” and collectively the “**Parties**”) and is made with reference to the following facts:

WHEREAS, On September 16, 2014, Governor Jerry Brown signed into law Senate Bills 1168 and 1319 and Assembly Bill 1739, known collectively as the Sustainable Groundwater Management Act (“**SGMA**”);

WHEREAS, SGMA requires all groundwater subbasins designated as high or medium priority by the California Department of Water Resources (“**DWR**”) to manage groundwater in a sustainable manner;

WHEREAS, the Delta-Mendota Subbasin (Basin Number 5-22.07, DWR Bulletin 118) within the San Joaquin Valley Groundwater Basin (“**Subbasin**”), has been designated as a high-priority basin by DWR;

WHEREAS, the Delta-Mendota Subbasin includes multiple groundwater sustainability agencies that intend to manage the Subbasin through the development and implementation of multiple different groundwater sustainability plans (“**GSP**”);

WHEREAS, SGMA allows local agencies to engage in the sustainable management of groundwater, but requires groundwater sustainability agencies in all basins that are managed by more than one groundwater sustainability plan to enter into a coordination agreement to coordinate the multiple groundwater sustainability plans to sustainably manage the Subbasin pursuant to SGMA;

WHEREAS, pursuant to the requirements of SGMA, and the California Code of Regulations, and in recognition of the need to sustainably manage the groundwater within the Delta-Mendota Subbasin, the Parties desire to enter into this Agreement between their individual groundwater sustainability agencies;

WHEREAS, in order to efficiently coordinate among the large number of groundwater sustainability agencies (“**GSA**”) in the Subbasin, the Parties intend to organize themselves into “**GSP Groups**” and to be represented by the “**GSP Group Representatives**,” on terms

to be developed and implemented by separate Agreements between each GSP Group and the Parties within such GSP Group; and

WHEREAS, this Coordination Agreement is being executed before the respective GSPs have been prepared, and the Parties anticipate attaching and incorporating technical reports covering such additional required information before submittal of this Agreement to DWR with the Parties' respective GSPs without separate amendment being required.

THEREFORE, in consideration of the facts recited above and of the covenants, terms and conditions set forth herein, the Parties agree as follows:

SECTION 1 – PURPOSE

1.1 Compliance with SGMA

In subbasins with multiple GSPs, SGMA requires the GSPs to be coordinated through a coordination agreement. The purpose of this Coordination Agreement including the anticipated attachment and incorporation of technical reports to be developed after the initial execution of this Agreement, is to comply with that SGMA requirement and ensure that the multiple GSPs within the Subbasin are developed and implemented utilizing the same methodologies and assumptions, that the elements of the GSPs are appropriately coordinated to support sustainable management, and to ultimately set forth the information necessary to show how the multiple GSPs in the Subbasin will achieve the sustainability goal, as determined for the Subbasin in compliance with SGMA and its associated regulations.

1.2 Description of Criteria & Function

An additional purpose of this Coordination Agreement is to describe the criteria for establishing the responsibilities of each Party for meeting the terms of this Coordination Agreement, the procedure for the exchange of information between the Parties, and procedures for resolving conflicts between the Parties. The goal of the coordination is to ensure that the Subbasin GSPs utilize the same data and methodologies, including but not limited to, groundwater elevation data, groundwater extraction data, surface water supply, total water use, changes in groundwater storage, water budgets, and sustainable yield during their development as required by SGMA and associated regulations. Additionally, this Coordination Agreement sets out the process for identifying a Plan Manager.

SECTION 2 – DEFINITIONS

2.1 “Coordinated Plan Expenses” shall mean any expenses incurred by the Secretary and the Plan Manager for purposes of developing and implementing the Coordination Agreement.

2.2 “Coordination Agreement” shall mean this Coordination Agreement.

2.3 “Coordination Committee” shall mean the committee of GSP Group Representatives established pursuant to this Coordination Agreement.

2.4 “Group Contact” shall mean one Party designated on Exhibit “A” attached hereto and by reference incorporated herein as responsible to supply notices and to circulate information and invoices for its respective Exhibit “A” GSP Group, as said Exhibit may be updated from time to time.

2.5 “GSA” shall mean a groundwater sustainability agency established in accordance with SGMA and its associated regulations, and “GSAs” shall mean more than one such groundwater sustainability agency. Each Party is a GSA.

2.6 “GSP” shall mean a groundwater sustainability plan as defined by SGMA and its regulations, and “GSPs” shall mean more than one such plan.

2.7 “GSP Group” shall mean a grouping of Parties, stakeholders, and interested parties developing an individual GSP within the Subbasin, as shown in Exhibit “A,” who are combined for purposes of representation and voting on the Coordination Committee and for purposes of sharing Coordinated Plan Expenses as set forth in this Coordination Agreement.

2.8 “GSP Group Alternate Representative,” “Alternate Representative,” or “Alternate” and their plural forms shall mean an alternate member of the Coordination Committee selected to represent the GSP Groups in accordance with Exhibit “A” and Section 5.1.2-5.1.4 of this Coordination Agreement who shall serve in the absence of the respective GSP Group Representative and shall be entitled to cast the vote for the absent GSP Representative.

2.9 “GSP Group Representative” or “Representative” and their plural forms as appropriate shall mean a member or members of the Coordination Committee selected to represent the GSP Groups in accordance with Exhibit “A” and Section 5.1.2 – 5.1.4 this Coordination Agreement.

2.10 “Participation Percentages” shall mean that percentage of Coordinated Plan Expenses allocated to each GSP Group as described on Exhibit “A” to this Coordination Agreement, which is attached and incorporated by reference herein, as updated from time to time.

2.11 “**Party**” or “**Parties**” shall mean a Groundwater Sustainability Agency or in the plural, two or more Groundwater Sustainability Agencies within the Delta-Mendota Subbasin.

2.12 “**Plan Manager**” shall mean an entity or individual, appointed at the pleasure of the Coordination Committee, or as provided in section 4.1.2 of this Coordination Agreement, to perform the role of the Plan Manager to serve as the point of contact to DWR as set forth in Section 5.2.3 of this Coordination Agreement.

2.13 “**Seasonal High**” shall mean the highest annual static groundwater elevation associated with stable aquifer conditions following a period of lowest annual groundwater demand.

2.14 “**Seasonal Low**” shall mean the lowest annual static groundwater elevation associated with a period of stable aquifer conditions following a period of highest annual groundwater demand.

2.15 “**San Luis & Delta-Mendota Water Authority**” or “**SLDMWA**” shall mean the San Luis & Delta-Mendota Water Authority, a California joint powers agency.

2.16 “**SGMA**” shall mean the Sustainable Groundwater Management Act, as amended from time to time, commencing at Water Code section 10720, together with its implementing regulations applicable to Groundwater Sustainability Plans, set forth at California Code of Regulations, Title 23, Division 2, Chapter 1.5, Subchapter 2.

2.17 “**SGMA Definitions**” shall mean those SGMA-specific definitions provided by statute or regulation and attached in the Appendix to this Coordination Agreement; in the event of any inconsistency between a term defined in this Section and a SGMA-specific definition, the definition contained in this Coordination Agreement shall prevail.

2.18 “**Subbasin**” shall mean the Delta-Mendota Subbasin (Basin Number 5-22.07, DWR Bulletin 118) within the San Joaquin Valley Groundwater Basin.

2.19 “**Technical Memoranda**” shall mean the memoranda prepared by the Coordination Committee that include the data and methodologies for assumptions described in Water Code section 10727.6 to prepare coordinated plans. Individually, the memoranda shall be referred to as a “**Technical Memorandum.**”

2.20 “**Water Year**” shall mean the period from October 1 through the following September 30 as defined by SGMA.

2.21 “**Water Year Type**” shall mean the classification provided by DWR to assess the amount of annual precipitation in a basin and as defined by SGMA.

SECTION 3 – GENERAL GUIDELINES

3.1 Responsibilities of the Parties

3.1.1 Obligation to Coordinate

The Parties to this Coordination Agreement agree to work collaboratively to meet the objectives of SGMA and this Coordination Agreement. Each Party to this Coordination Agreement is a GSA and acknowledges that it is bound by the terms of this Coordination Agreement as an individual Party.

3.1.2 Obligations Outside of Coordination Agreement Regarding GSP Groups

a) Representation and Voting. Each Party understands its participation, as more fully set forth in Section 5 of this Coordination Agreement, is based on representation through and by its GSP Group Representative(s). It is the responsibility and obligation of each Party under this Coordination Agreement to develop its own arrangements for how its respective GSP Group Representative and Alternate Representative are selected and how required actions of GSAs within the GSP Group under its respective GSP are identified and implemented.

b) The Coordination Committee and its members shall have no requirement to recognize a voting status or other decisional authority of any Party to this Coordination Agreement other than through the designated GSP Group Representative(s). For purposes of this Coordination Agreement, it is assumed that GSP Group Representatives have been authorized by the Parties in their GSP Groups to participate as described herein.

c) By signing this Coordination Agreement, each Party commits to provide documentation to the Secretary and the Coordination Committee of the authorization of its GSP Group Representative(s). Provided, that the Secretary shall not be obligated to evaluate or provide an opinion on the legal sufficiency of the documentation.

d) It is the responsibility and obligation of each Party under this Coordination Agreement that is included on Exhibit “A” as part of a multi-party GSP Group to provide documentation to the Secretary and to the Coordination Committee establishing that such GSP Group has a binding agreement or mechanism assuring that the GSP Group will pay its Participation Percentage set forth on Exhibit “A,” as said Exhibit “A” may be modified from time to time. Provided, that the Secretary shall not be obligated to evaluate or provide an opinion on the legal sufficiency of the documentation.

3.1.3 Non-Entity Status

The Parties acknowledge and agree that this Coordination Agreement does not create a legal entity with power to sue or be sued, to enter into contract, or to enjoy the benefits or accept the obligations of a legal entity.

3.1.4 Implementation of Individual GSPs

This Coordination Agreement does not otherwise affect each Party's responsibility to implement the terms of its respective GSP in accordance with SGMA. Rather, this Coordination Agreement is the mechanism through which the Parties will coordinate their respective GSPs to the extent necessary to ensure that such GSP coordination complies with SGMA.

3.2 Adjudicated or Alternate Plans in the Subbasin

As of the date of this Coordination Agreement, there are no portions of the Subbasin that have been adjudicated or approved to submit an alternative plan as defined by SGMA.

SECTION 4 – ROLE OF SAN LUIS & DELTA-MENDOTA WATER AUTHORITY

4.1 Agreement to Serve

By executing this Agreement, and not as a Party, the San Luis & Delta-Mendota Water Authority agrees to carry out the functions described in this Section 4 and its subparts consistent with the terms of this Section and under the direction and supervision of the Coordination Committee, subject to the reimbursement and the termination provisions contained in this Section.

4.1.1 Secretary

The SLDMWA agrees to perform the obligations of the Secretary described in this Coordination Agreement, by delegation to one or more of its employees or to a consultant under contract to the SLDMWA.

4.1.2 Plan Manager

The SLDMWA agrees to perform the obligations of the Plan Manager described in this Coordination Agreement, by delegation to one or more of its employees or to a consultant under contract to the SLDMWA.

4.2 Reimbursement of SLDMWA

The commitment of the SLDMWA to perform the designated functions under this Section is contingent upon the execution and performance of a separate cost sharing agreement between the SLDMWA and the Parties.

4.3 Termination of SLDMWA's Services

Either the Parties acting through the Coordination Committee or the SLDMWA at any time may terminate the services being provided by the SLDMWA under this Coordination Agreement upon thirty (30) days' written notice, if from the SLDMWA, to the Coordination Committee and each GSP Group Representative; and if from the Coordination Committee, to the SLDMWA and each GSP Group Representative.

SECTION 5 – RESPONSIBILITIES FOR KEY FUNCTIONS

5.1 Coordination Committee

5.1.1 The Parties agree to establish a Coordination Committee to provide the forum for the Parties to accomplish the coordination obligation of SGMA pursuant to this Coordination Agreement.

5.1.2 The Coordination Committee will consist of the GSP Group Representatives identified on Exhibit "A" attached hereto and incorporated herein by this reference, as said Exhibit "A" may be modified from time to time pursuant to Section 13 of this Agreement. Each GSP Group Representative shall have one Alternate Representative authorized to vote in the absence of the GSP Group Representative.

5.1.3 Individuals serving as GSP Group Representatives and Alternate Representatives shall be selected by each respective GSP Group in the discretion of the respective GSP Group, and such appointments shall be effective upon providing written notice to the Secretary and to each Group Contact listed on Exhibit "A".

5.1.4 The Coordination Committee will recognize each GSP Group Representative and GSP Group Alternate Representative until such time as the Group Contact provides written notice of removal and replacement to the Secretary and to every other Group Contact designated on Exhibit "A." Each GSP Group or GSP Subgroup shall promptly fill any vacancy created by the removal of such Representative or Alternate Representative so that each GSP

Group shall have the number of validly designated Representatives and Alternate Representatives specified on Exhibit “A”.

5.1.5. Minutes of the Coordination Committee will be prepared and maintained as set forth in Section 5.5.4.

5.2 Coordination Committee Officers

The Officers of the Coordination Committee will include a Chairperson, Vice Chairperson, Secretary, and Plan Manager. Except where the Parties have named such Officers pursuant to Section 4 of this Coordination Agreement, Officers shall be selected at the initial meeting of the Committee or as soon thereafter as reasonably can be accomplished.

5.2.1 Chairperson and Vice Chairperson

a) A GSP Group Representative shall serve as Chairperson. The Vice Chairperson, who shall also be a GSP Group Representative, shall serve in the absence of the Chairperson. In the absence of both the Chairperson and Vice Chairperson, a meeting may be led by an Acting Chairperson selected on an ad hoc basis.

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

5.2.2 Secretary

The Coordination Committee shall select a Secretary to carry out the functions described in this subsection, to serve at the pleasure of the Coordination Committee. The Secretary shall be a public agency who may be, but need not be a Party to this Coordination Agreement. The San Luis & Delta-Mendota Water Authority is hereby designated as the initial Secretary, to serve at the pleasure of the Coordination Committee.

a) The Secretary shall select an appointee to implement the Secretary’s responsibilities under this Coordination Agreement, for example, to coordinate meetings; prepare agendas; circulate notices and agendas; provide written notice to all Parties that the Coordination Committee has made a recommendation requiring approval by the Parties; prepare and maintain minutes of meetings of the Coordination Committee; receive notices on

behalf of the Coordination Committee and call to the Coordination Committee's attention the need for responding; and provide such other assistance in coordination as may be appropriate.

b) The Secretary shall assume primary responsibility for Brown Act compliance, including without limitation, the responsibility to: prepare an agenda and notice, publicly post, and distribute agendas to all GSP Group or Subgroup Representatives, the Parties, and any other interested persons who requests, in writing, such notices. The Agenda shall be of adequate detail to inform the public and the parties of the meeting and the matters to be transacted or discussed, and shall be posted in a public location and distributed to each of the parties to this Coordination Agreement at least seventy-two (72) hours prior to every regular meeting and at least twenty-four (24) hours prior to every special meeting.

5.2.3 Plan Manager

If the SLDMWA ceases to serve as Plan Manager as agreed under Section 4.1.2 of this coordination Agreement, then the Coordination Committee shall name a successor Plan Manager, who may be a consultant hired by the Secretary pursuant to the Coordination Agreement, the representative of an entity that has been selected as Secretary, or a public agency serving as or participating in a GSA that is a Party to this Coordination Agreement, and who shall serve as the point of contact for DWR as specified by SGMA. The San Luis & Delta-Mendota Water Authority is hereby designated as the initial Plan Manager, to serve at the pleasure of the Coordination Committee.

a) The Plan Manager shall carry out the duties of a "plan manager" as provided in Title 23, division 2, Chapter 1.5, Subchapter 2, California Code of Regulations.

b) The Plan Manager has no authority to make policy decisions or represent the Coordination Committee without the specific direction of the Coordination Committee. The Plan Manager is obligated to disclose all substantive communications he/she transmits and receives in his/her capacity as Plan Manager to the Coordination Committee.

5.3 Coordination Committee Authorized Actions and Limitations

5.3.1 Authorized Actions

The Coordination Committee is authorized to act upon the following enumerated items:

a) The Coordination Committee shall review, and consistent with the requirements of SGMA, approve the Technical Memoranda described in Sections 8-12 of this Coordination Agreement.

b) Once GSP Plans have been submitted to and approved by DWR, the Coordination Committee shall be responsible for ongoing review and updating of the Technical Memoranda as needed; assuring submittal of annual reports; providing five-year assessments and recommending any needed revisions to the Coordination Agreement; and providing review and assistance with coordinated projects and programs.

c) The Coordination Committee shall review and approve work plans, and in accordance with the budgetary requirements of the respective Parties, approve annual estimates of Coordinated Plan Expenses presented by the Secretary and any updates to such estimates; provided, that such estimates or updates with supporting documentation shall be circulated to all Parties for comment at least thirty (30) days in advance of the meeting at which the Coordination Committee will consider approval of the annual estimate.

d) Pursuant to Section 13, the Coordination Committee is authorized to approve changes to Exhibit “A” to this Coordination Agreement and to recommend amendments to terms of this Coordination Agreement.

e) The Coordination Committee shall assign work to subcommittees and workgroups as needed, provide guidance and feedback and ensure that subcommittees and workgroups prepare work products in a timely manner.

f) The Coordination Committee shall direct the Plan Manager in the performance of its duties under SGMA.

g) The Coordination Committee shall provide direction to its Officers concerning other administrative and ministerial issues necessary for the fulfillment of the above-enumerated tasks.

5.3.2 Limitations

When the terms of this Coordination Agreement or applicable law require the approval of a Party, that approval shall be required and evidenced as indicated in Section 6 of this Agreement.

5.4 Subcommittees and Workgroups

The Coordination Committee may appoint subcommittees, workgroups, or otherwise direct staff made available by the Parties. Such subcommittees or workgroups may include qualified individuals possessing the knowledge and expertise to advance the goals of the Coordination

Agreement on the topics being addressed by the subcommittee, whether or not such individuals are GSP Group Representatives or Alternate Representatives.

5.4.1 Work of Subcommittees and Workgroups

Tasks assigned to subcommittees, workgroups, or staff made available by the Parties may include developing technical data, supporting information, and/or recommendations on matters including, but not limited to:

a) Developing a process to update the Coordination Committee on the activities of the respective Parties, including the development, planning, financing, environmental review, permitting, implementation, and long-term monitoring of the multiple GSPs in the Subbasin;

b) Subject to the oversight of the Coordination Committee, scheduling meetings of the subcommittee or workgroup as necessary to coordinate development and implementation of the Technical Memoranda and Coordination Agreement. Attendance at these meetings may be augmented to include staff or consultants of all Parties to ensure that the appropriate expertise is available;

c) Determining common methodologies for GSP development;

d) Developing a Subbasin-wide monitoring network;

e) Preparing a coordinated water budget;

f) Developing a coordinated data management system;

g) Providing an explanation of how the respective GSPs implemented together satisfy the requirements of SGMA and are in substantial compliance with SGMA; and

h) Such other tasks as may be referred by the Coordination Committee from time to time.

5.4.2 Subcommittee Voting

One GSP Group Representative or Alternate Representative shall vote on behalf of the GSP Group at the subcommittee level; if no GSP Group Representative or Alternate Representative is present, one individual working on a subcommittee on behalf of the Parties in a GSP Group shall vote on behalf of the GSP Group. Subcommittees shall report voting results and provide

information to the Coordination Committee but shall not be entitled to make determinations or determinations that are binding on the Parties.

5.5 Coordination Committee Meetings

5.5.1 Timing and Notice

The Chairperson of the Coordination Committee, any two GSP Group Representatives, or the Secretary may call meetings of the Coordination Committee as needed to carry out the activities described in this Coordination Agreement. The Coordination Committee may, but is not required to, set a date for regular meetings for the purposes described in this Coordination Agreement. All Coordination Committee Meetings shall be held in compliance with the Ralph M. Brown Act (Government Code Section 54950 *et seq.*).

5.5.2 Quorum

A majority of the GSP Group Representative(s) from every GSP Group listed on Exhibit “A” shall constitute a quorum of the Coordination Committee for purposes of holding a Coordination Committee meeting; provided, that the GSP Group Representative(s) from every GSP Group listed on Exhibit “A” must be present at a meeting for any Coordination Committee vote on a matter described in section 5.3.1 a) through 5.3 d) and 5.3.1 f) to take place. The GSP Group Alternate Representative(s) of each GSP Group shall be counted towards a quorum and as the voting representative(s) in the absence of the GSP Group Representative for which the GSP Group Alternate has been appointed. If less than a quorum is present, the GSP Group Representatives and Alternate Representatives may hear reports and discuss items on the agenda, but no action may be taken.

5.5.3 Open Attendance

Members of the public, stakeholders, and representatives of the Parties who are not appointed as GSP Group Representatives may attend all meetings and shall be provided with an opportunity to comment on matters on the meeting agenda, but shall have no vote.

5.5.4 Minutes

The Secretary’s appointee shall keep and prepare minutes of all Coordination Committee meetings. Notes of subcommittee and workgroup meetings shall be kept by the Secretary’s appointee or an assistant to the appointee. All minutes and subcommittee and workgroup meeting notes shall be maintained by the Secretary as Coordination Agreement records and shall be available to the Parties and the public upon request.

5.6 Voting by Coordination Committee

5.6.1. Each GSP Group Representative shall be entitled to one vote at the Coordination Committee. It shall be up to the Parties in each GSP Group to determine how the GSP Group vote(s) will be cast.

5.6.2 Except as set forth in Section 5.6.3, the unanimous vote of the GSP Representatives from all GSP Groups is required on all items upon which the Coordination Committee is authorized to act as identified in Section 5.3.1 a) through 5.3.1 d) and 5.3.1 f); the vote of a majority of a quorum shall be required for all other matters on which the Coordination Committee is authorized to act.

5.6.3 Voting Procedures to Address Lack of Unanimity

When it appears likely that the Coordination Committee will not be able to come to unanimous decision on any matter upon for which a unanimous decision is required, upon a majority vote of a quorum of the Coordination Committee, the matter may be subjected to the following additional procedures.

a) Straw Polls

Straw poll votes may be taken for the purpose of refining ideas and providing guidance to the Coordination Committee, subcommittees, or both.

b) Provisional Voting

Provisional votes may occur prior to final votes. This will be done when an initial vote is needed to refine a proposal but the GSP Group Representatives wish to consult with their respective GSP Group(s) before making a final vote.

c) A vote shall be delayed if any GSP Group Representative declares its intention to propose an alternative or modified recommended action, to be proposed at the next meeting, or as soon thereafter as the GSP Group Representative can obtain any further information or clarifying direction from its GSP Group or governing body, or both, as needed to proposed its alternative or modified recommended action.

d) If the process outlined in subsection 5.6.3(c) fails to result in a unanimous vote, any GSP Group Representative not voting in favor of the recommended action may request that the vote be delayed so that the Coordination Committee can obtain further information on the recommended action (for example, by directing a subcommittee established under this

Coordination Agreement), so the GSP Group Representative can obtain clarifying direction from its GSP Group or governing body, or both, as needed.

e) Each of the Parties acknowledges the limited time provided by SGMA to complete the GSP preparation process, and agrees to make its best efforts to cooperate through the Coordinating Committee in coming to require a unanimous vote.

SECTION 6 – APPROVAL BY INDIVIDUAL PARTIES

6.1 Where law or this Coordination Agreement require separate written approval by each of the Parties, such approval shall be evidenced in writing by providing the resolution, Motion, or Minutes of their respective Boards of Directors to the Secretary of the Coordination Committee.

SECTION 7 – EXCHANGE OF DATA AND INFORMATION

7.1 Exchange of Information

The Parties acknowledge and recognize pursuant to this Coordination Agreement that the Parties may need to exchange information amongst and between the Parties.

7.2 Procedure for Exchange of Information

7.2.1 The Parties shall exchange public and non-privileged information through collaboration and/or informal requests made at the Coordination Committee level or through subcommittees designated by the Coordination Committee. However, to the extent it is necessary to make a written request for information to another Party, each Party shall designate a representative to respond to information requests and provide the name and contact information of the designee to the Coordination Committee. Requests may be communicated in writing and transmitted in person or by mail, facsimile machine, or other electronic means to the appropriate representative as named in this Coordination Agreement. The designated representative shall respond in a reasonably timely manner.

7.2.2 Nothing in this Coordination Agreement shall be construed to prohibit any Party from voluntarily exchanging information with any other Party by any other mechanism separate from the Coordination Committee.

7.2.3 The Parties agree that each GSP Group shall provide the data required to develop the Subbasin-wide coordinated water budget but unless required by law, will not be required to provide individual well or parcel-level information in order to preserve

confidentiality of individuals to the extent authorized by law, including but not limited to Water Code Section 10730.8, subdivision (b).

7.2.4 To the extent that a court order, subpoena, or the California Public Records Act is applicable to a Party, such Party in responding to a request made pursuant to that Act for release of information exchanged from another Party shall notify each other Party in writing of its proposed release of information in order to provide the other Parties with the opportunity to seek a court order preventing such release of information.

SECTION 8 – METHODOLOGIES AND ASSUMPTIONS

8.1 SGMA Coordination Requirements

Pursuant to SGMA, this Coordination Agreement must ensure that the individual GSPs utilize the same data and methodologies for developing assumptions used to determine: 1) groundwater elevation; 2) groundwater extraction data; 3) surface water supply; 4) total water use; 5) changes in groundwater storage; 6) water budgets; and 7) sustainable yield.

8.2 Pre-GSP Coordination

Prior to the individual development of GSPs, the Parties agree to develop agreed-upon methodologies and assumptions for 1) groundwater elevation; 2) groundwater extraction data; 3) surface water supply; 4) total water use; 5) changes in groundwater storage; 6) water budgets; and 7) sustainable yield. This development may be facilitated through the Coordination Committee's delegation to a sub-committee or workgroup of the technical staff provided by some or all of the Parties. The basis upon which the methodologies and assumptions will be developed includes existing data/information, best management practices, and/or best modeled or projected data available and may include consultation with the DWR as appropriate.

8.3 Technical Memoranda Required

The data and methodologies for assumptions described in Water Code section 10727.6 and title 23, California Code of Regulations, section 357.4 to prepare coordinated plans shall be set forth in Technical Memoranda prepared by the Coordination Committee for each of the elements discussed in Sections 9, 10, 11, and 12 of this Coordination Agreement. The Technical Memoranda shall be subject to the unanimous approval of the Coordination Committee and once approved, shall be attached to and incorporated by reference into this Coordination Agreement without

formal amendment of the Coordination Agreement being required. The Parties agree that they shall not submit this Coordination Agreement to DWR until the Technical Memoranda described herein have been added to the Coordination Agreement. The Technical Memoranda created pursuant to this Agreement shall be utilized by the Parties during the development and implementation of their GSPs in order to assure coordination of the GSPs in compliance with SGMA.

SECTION 9 – MONITORING NETWORK

9.1 In accordance with SGMA, the Parties hereby agree to coordinate the development and maintenance of a monitoring network at a Subbasin level through the coordination of the respective monitoring networks established pursuant to the GSPs in which each of the Parties hereto are participating. The Subbasin monitoring network description shall include monitoring objectives, protocols, and data reporting requirements specific to enumerated sustainability indicators. Each GSP Group's network shall facilitate the collection of data in order to characterize groundwater and related surface water conditions in the Subbasin and evaluate changing conditions that occur from implementation of the individual GSPs. Each Party's GSP will describe the monitoring network's objectives for the Subbasin, including an explanation of network development and implementation to monitor groundwater and related surface conditions, and the interconnection of surface water and groundwater.

9.2 Each GSP Group shall provide the Coordination Committee all relevant data and information for their respective representative monitoring sites established in accordance with Title 23, California Code of Regulations, section 354.36, as amended from time to time.

SECTION 10 – COORDINATED WATER BUDGET

10.1 In accordance with SGMA, the Parties hereby agree to prepare a single coordinated water budget for the Subbasin as described in this subsection for use in the respective GSP in which each of the Parties hereto are participating. The water budget will provide an estimate of the total annual volume of groundwater and surface water entering and leaving the Subbasin, including historical, current and projected water budget conditions, and the change in the volume of water stored and the safe yield for differing aquifers.

10.2 To the extent feasible, the Parties will consider the best available information and best available science to quantify the water budget for the Subbasin in order to provide an

understanding of historical and projected hydrology, water demand, water supply, land use, population, climate change, sea level rise, groundwater and surface water interaction, and subsurface groundwater flow.

SECTION 11 – COORDINATED DATA MANAGEMENT SYSTEM

11.1 The Parties will develop and maintain a coordinated data management system that is capable of storing and reporting information relevant to the reporting requirements and/or implementation of the GSPs and monitoring network of the Subbasin.

11.2 The Parties also will develop and maintain separate data management systems. Each separate data management system developed for each GSP will store information related to implementation of each individual GSP, monitoring network data and monitoring sites requirements, and water budget data requirements. Each system will be capable of reporting all pertinent information to the Coordination Committee. After providing the Coordination Committee with data from the individual GSPs, the Coordination Committee will ensure the data is stored and managed in a coordinated manner throughout the Subbasin and reported to DWR annually as required.

SECTION 12 – ADOPTION AND USE OF THE COORDINATION AGREEMENT

12.1 Coordination of GSPs

Each Party is responsible to ensure that its own GSP complies with the statutory requirements of SGMA, including but not limited to the filing deadline. The Parties to this Coordination Agreement intend that their individual GSPs be coordinated together in order to satisfy the requirements of SGMA and to be in substantial compliance with the California Code of Regulations. The collective GSPs will satisfy the requirements of sections 10727.2 and 10727.4 of the Water Code by providing a description of the physical setting and characteristics of the separate aquifer systems within the Subbasin, the measurable objectives for each such GSP, interim milestones, and monitoring protocols that together provide a detailed description of how the Basin as a whole will be sustainably managed.

12.2 GSP and Coordination Agreement Submission

The Parties agree to submit their respective GSPs to DWR through the Coordination Committee and Plan Manager, in accordance with all applicable requirements. Subject to the subsequent attachment of the Technical Memoranda described in Sections 8-12, the Parties intend that this Coordination Agreement fulfill the requirements of providing an explanation of how the GSPs implemented together satisfy the requirements SGMA for the entire Subbasin.

SECTION 13 – MODIFICATION AND TERMINATION OF THE COORDINATION AGREEMENT

13.1 Modification or Amendment of Exhibit “A”

The Parties agree that Exhibit “A,” except for the withdrawal or addition of Parties to this Agreement, may be updated by unanimous vote of the Coordination Committee from time to time. Upon such modification, the updated Exhibit “A” shall be attached to this Agreement as a replacement to the previously existing Exhibit “A.” Upon such attachment, the updated “Exhibit “A” shall become a part of this Coordination Agreement without further Amendment of the Coordination Agreement being required. The Secretary shall provide notice of such change to all Group Contacts.

13.1.1 Addition of a Party

A Party may be added to this Coordination Agreement only upon its execution of a counterpart of this Agreement and its provision of any additional documentation required by Sections 3.1.2 a) through 3.1.2 d) of this Coordination Agreement. No Party may be added that is not within the Delta-Mendota Subbasin or that fails to execute an agreement to share in Coordinated Plan Expenses, unless such payment is waived by consent of all Parties.

13.2 Modification or Amendment of Coordination Agreement

Except as provided in Sections 13.1 and 13.3, the Parties hereby agree that this Coordination Agreement may be supplemented, amended, or modified only by a writing signed by all Parties.

13.3 Amendment for Compliance with Law

Should any provision of this Coordination Agreement be determined to be not in compliance with legal requirements under circumstances where amendment of the Agreement to include a provision addressing the legal requirement will cure the non-compliance, the Parties agree to promptly prepare and approve such amendment.

SECTION 14 – WITHDRAWAL, TERM, AND TERMINATION

14.1 Withdrawal

Subject to the requirements identified in SGMA and the any coordination guidelines or regulations issued by DWR, a Party may unilaterally withdraw from this Coordination Agreement without causing or requiring termination of this Coordination Agreement, effective upon thirty (30) days written notice to the Secretary and all other Parties. The Plan Coordinator shall report any such withdrawal to DWR within five (5) days of receipt of the written notice.

14.1.1 Any Party who withdraws shall remain obligated for Coordinated Plan Expenses as provided in a separate Cost Sharing Agreement. If no separate Cost Sharing Agreement is then in effect or enforceable against the withdrawing Party, the Party is obligated to pay its share of all debts, liabilities, and obligations the Party incurred or accrued under the Coordination Agreement prior to the effective date of such withdrawal, as established under its separate GSP Group agreement concerning such share of obligations.

14.1.2 Upon withdrawal, a Party agrees that it has a continuing obligation to comply with SGMA and any coordination guidelines or regulations issued by DWR, which require a coordination agreement if there are multiple GSPs in the Subbasin. This obligation shall survive the withdrawal from this Coordination Agreement and is for the express benefit of the remaining Parties.

14.1.3 In the event any GSP Group Representative(s) prevents/prevent a required unanimous vote of the Coordination Committee after following all procedures described in 5.3.1 or Section 15 of this Agreement, the Parties in such GSP Group agree to provide notice that such GSP Group has unilaterally withdrawn from this Agreement in accordance with this Section.

14.2 Term

As modified pursuant to Section 13 and unless terminated in accordance with Section 14.2.3, this Coordination Agreement shall continue for a term that is coterminous with the requirements of SGMA for the existence of a Coordination Agreement.

14.3 Termination

This Coordination Agreement may be terminated or rescinded and the coordinated implementation of GSPs terminated by unanimous written consent of all the Parties. Nothing

in this Coordination Agreement shall prevent the Parties from entering into another coordination agreement for coordination with any other subbasin.

SECTION 15 – PROCEDURES FOR RESOLVING CONFLICTS

In the event of any dispute arising from or relating to this Agreement, the disputing Party shall, within thirty (30) calendar days of discovery of the events giving rise to the dispute, notify all Parties to this Agreement in writing of the basis for the dispute. Within thirty (30) calendar days of receipt of said notice, all interested Parties shall meet and confer in a good-faith attempt to informally resolve the dispute. All disputes that are not resolved informally shall be settled by arbitration. Within ten (10) days following the failed informal proceedings, each interested Party shall nominate and circulate to all other interested Parties the name of one arbitrator. Within ten (10) days following the nominations, the interested Parties shall rank their top three among all nominated arbitrators, awarding three points to the top choice, two points to the second choice, one point to the third choice and zero points to all others. Each interested Party shall forward its tally to the Secretary, who shall tabulate the points and notify the interested Parties of the arbitrator with the highest cumulative score, who shall be the selected arbitrator. The Secretary may also develop procedures for approval by the Parties, for selection in the case of tie votes or in order to replace the selected arbitrator in the event such arbitrator declines to act. The arbitration shall be administered in accordance with the procedures set forth in the California Code of Civil Procedure, section 1280, et seq., and of any state or local rules then in effect for arbitration pursuant to said section. Upon completion of arbitration, if the controversy has not been resolved, any Party may exercise all rights to bring a legal action relating to the controversy.

SECTION 16 – GENERAL PROVISIONS

16.1 Authority of Signers

The individuals executing this Coordination Agreement represent and warrant that they have the authority to enter into this Coordination Agreement and to legally bind the Party for whom they are signing to the terms and conditions of this Coordination Agreement.

16.2 Governing Law

The validity and interpretation of this Coordination Agreement will be governed by the laws of the State of California without giving effect to the principles of conflict of laws, with venue for all purposes to be proper only in the County of Merced, State of California.

16.3 Severability

Except as provided for cure by amendment in Section 13.3, if any term, provision, covenant, or condition of this Coordination Agreement is determined to be unenforceable by a court of competent jurisdiction, it is the Parties' intent that the remaining provisions of this Coordination Agreement will remain in full force and effect and will not be affected, impaired, or invalidated by such a determination.

16.4 Counterparts

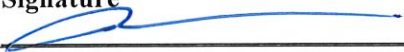
This Coordination Agreement may be executed in any number of counterparts, each of which will be an original, but all of which will constitute one and the same agreement.

16.5 Good Faith

The Parties agree to exercise their best efforts and utmost good faith to effectuate all the terms and conditions of this Coordination Agreement and to execute such further instruments and documents as are reasonably necessary, appropriate, expedient, or proper to carry out the intent and purposes of this Coordination Agreement.

SECTION 17 – SIGNATORIES

PARTIES:

PATTERSON IRRIGATION DISTRICT GSA			
Patterson Irrigation District		Date: 05/22/2018	
Signature 			
Name of Representative: Vince Lucchesi			
WEST STANISLAUS IRRIGATION DISTRICT GSA 1			
West Stanislaus Irrigation District		Date:	
Signature			
Name of Representative:			
DM II GSA			
Del Puerto Water District		Date:	Oak Flat Water District
Signature			Signature
Name of Representative:		Name of Representative:	
CITY OF PATTERSON GSA			
City of Patterson		Date:	
Signature			
Name of Representative:			

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Except as provided for cure by amendment in Section 13.3, if any term, provision, covenant, or condition of this Coordination Agreement is determined to be unenforceable by a court of competent jurisdiction, it is the Parties' intent that the remaining provisions of this Coordination Agreement will remain in full force and effect and will not be affected, impaired, or invalidated by such a determination.

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SECTION 17 – SIGNATORIES

PARTIES:

PATTERSON IRRIGATION DISTRICT GSA			
Patterson Irrigation District		Date:	
Signature			
Name of Representative:			
WEST STANISLAUS IRRIGATION DISTRICT GSA 1			
West Stanislaus Irrigation District		Date: 5/16/18	
Signature <i>Robert Pierce</i>			
Name of Representative: <i>Robert Pierce, General Manager</i>			
DM II GSA			
Del Puerto Water District		Date:	Oak Flat Water District
Date:		Date:	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
CITY OF PATTERSON GSA			
City of Patterson		Date:	
Signature			
Name of Representative:			

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Except as provided for cure by amendment in Section 13.3, if any term, provision, covenant, or condition of this Coordination Agreement is determined to be unenforceable by a court of competent jurisdiction, it is the Parties' intent that the remaining provisions of this Coordination Agreement will remain in full force and effect and will not be affected, impaired, or invalidated by such a determination.

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SECTION 17 – SIGNATORIES

PARTIES:

PATTERSON IRRIGATION DISTRICT GSA			
Patterson Irrigation District	Date:	Twin Oaks Irrigation Company	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
WEST STANISLAUS IRRIGATION DISTRICT GSA 1			
West Stanislaus Irrigation District	Date:		
Signature			
Name of Representative:			
WEST STANISLAUS IRRIGATION DISTRICT GSA 2			
West Stanislaus Irrigation District	Date:		
Signature			
Name of Representative:			
DM II GSA			
Del Puerto Water District	Date: 8/28/18	Oak Flat Water District	Date: 8/28/18
Signature Anthea C Hansen		Signature Anthea C Hansen	
Name of Representative: Anthea C Hansen		Name of Representative: Anthea C Hansen	

16.3 Severability

Except as provided for cure by amendment in Section 13.3, if any term, provision, covenant, or condition of this Coordination Agreement is determined to be unenforceable by a court of competent jurisdiction, it is the Parties' intent that the remaining provisions of this Coordination Agreement will remain in full force and effect and will not be affected, impaired, or invalidated by such a determination.

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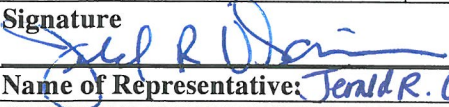
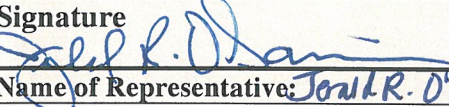
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SECTION 17 – SIGNATORIES

PARTIES:

PATTERSON IRRIGATION DISTRICT GSA				
Patterson Irrigation District		Date:		
Signature				
Name of Representative:				
WEST STANISLAUS IRRIGATION DISTRICT GSA 1				
West Stanislaus Irrigation District		Date:		
Signature				
Name of Representative:				
DM II GSA				
Del Puerto Water District		Date:	Oak Flat Water District	Date:
Signature		Signature		
Name of Representative:		Name of Representative:		
CITY OF PATTERSON GSA				
City of Patterson		Date: 9/20/18		
Signature				
Name of Representative: Ken Irwin				

CITY OF PATTERSON GSA			
City of Patterson		Date:	
Signature			
Name of Representative:			
NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced		Date: 7/31/18	County of Stanislaus
Date:		Date:	
Signature		Signature	
			
Name of Representative: Jerald R. O'Banion		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District		Date:	Panoche Water District
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District		Date:	Fresno Slough Water District
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
Eagle Field Water District		Date:	Pacheco Water District
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
Santa Nella County Water District		Date:	Mercy Springs Water District
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced		Date: 7/31/18	County of Fresno
Date:		Date:	
Signature		Signature	
			
Name of Representative: Jerald R. O'Banion		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District		Date:	
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District		Date:	
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District		Date:	Columbia Canal Company
Date:		Date:	
Signature		Signature	

CITY OF PATTERSON GSA			
City of Patterson		Date:	
Signature			
Name of Representative:			
NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced		Date:	
Signature		County of Stanislaus	
Signature		Date: 10/9/18	
Name of Representative:		Jim DeMartini, Chariman:	
APPROVED AS TO FORM		BY:  Date: 10/3/18	
John P. Doering		County Counsel	
Stanislaus County		Asst County Counsel	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District		Date:	
Signature		Panoche Water District	
Signature		Date:	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District		Date:	
Signature		Fresno Slough Water District	
Signature		Date:	
Name of Representative:		Name of Representative:	
Eagle Field Water District		Date:	
Signature		Pacheco Water District	
Signature		Date:	
Name of Representative:		Name of Representative:	
Santa Nella County Water District		Date:	
Signature		Mercy Springs Water District	
Signature		Date:	
Name of Representative:		Name of Representative:	
County of Merced		Date:	
Signature		County of Fresno	
Signature		Date:	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District		Date:	
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District		Date:	
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District		Date:	
Signature		Columbia Canal Company	
Signature		Date:	

NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced	Date:	County of Stanislaus	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District	Date: 8/13/18	Panoche Water District	Date:
Signature		Signature	
Name of Representative: Lon Martin		Name of Representative:	
Tranquillity Irrigation District	Date:	Fresno Slough Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Eagle Field Water District	Date:	Pacheco Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Santa Nella County Water District	Date:	Mercy Springs Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced	Date:	County of Fresno	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District	Date:		
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District	Date:		
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District	Date:	Columbia Canal Company	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Firebaugh Canal Company	Date:	San Luis Canal Company	Date:
Signature		Signature	

CITY OF PATTERSON GSA			
City of Patterson		Date:	
Signature			
Name of Representative:			
NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced		Date:	
County of Stanislaus		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District		Date:	
Panoche Water District		Date:	
Signature		Signature	
Name of Representative:		Name of Representative: John Bennett	
Tranquillity Irrigation District		Date:	
Fresno Slough Water District		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
Eagle Field Water District		Date:	
Pacheco Water District		Date:	
Signature		Signature	
Name of Representative:		Name of Representative: Aaron Barcellos	
Santa Nella County Water District		Date:	
Mercy Springs Water District		Date:	
Signature		Signature	
Name of Representative:		Name of Representative: Michael Linneman	
County of Merced		Date:	
County of Fresno		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District		Date:	
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District		Date:	
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District		Date:	
Columbia Canal Company		Date:	
Signature		Signature	

CITY OF PATTERSON GSA			
City of Patterson		Date:	
Signature			
Name of Representative:			
NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced		Date:	County of Stanislaus
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District		Date:	Panoche Water District
Signature		Signature	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District		Date:	Fresno Slough Water District
Signature		Signature	Date:
Name of Representative: Jerry Salvador		Name of Representative:	
Eagle Field Water District		Date:	Pacheco Water District
Signature		Signature	
Name of Representative:		Name of Representative:	
Santa Nella County Water District		Date:	Mercy Springs Water District
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced		Date:	County of Fresno
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District		Date:	
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District		Date:	
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District		Date:	Columbia Canal Company
Signature		Signature	

NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced	Date:	County of Stanislaus	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District	Date:	Panoche Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District	Date:	Fresno Slough Water District	Date:
Signature		Signature	8-6-18
Name of Representative:		Name of Representative:	
Eagle Field Water District	Date:	Pacheco Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Santa Nella County Water District	Date:	Mercy Springs Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced	Date:	County of Fresno	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District	Date:		
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District	Date:		
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District	Date:	Columbia Canal Company	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Firebaugh Canal Company	Date:	San Luis Canal Company	Date:
Signature		Signature	

NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced	Date:	County of Stanislaus	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District	Date:	Panoche Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District	Date:	Fresno Slough Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Eagle Field Water District	Date:	Pacheco Water District	Date:
Signature <i>Randall Miles 6-27-18</i>		Signature	
Name of Representative: Randall Miles		Name of Representative:	
Santa Nella County Water District	Date:	Mercy Springs Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced	Date:	County of Fresno	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District	Date:		
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District	Date:		
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District	Date:	Columbia Canal Company	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Firebaugh Canal Company	Date:	San Luis Canal Company	Date:
Signature		Signature	

NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced		County of Stanislaus	
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District		Panoche Water District	
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District		Fresno Slough Water District	
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
Eagle Field Water District		Pacheco Water District	
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
Santa Nella County Water District		Mercy Springs Water District	
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced		County of Fresno	
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District		Date:	
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District		Date:	
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District		Columbia Canal Company	
Date:		Date:	
Signature		Signature	
Name of Representative:		Name of Representative:	
Firebaugh Canal Company		San Luis Canal Company	
Date:		Date:	
Signature		Signature	

NORTHWESTERN DELTA-MENDOTA GSA

County of Merced	Date:	County of Stanislaus	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	

CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA

San Luis Water District	Date:	Panoche Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	

Tranquillity Irrigation District	Date:	Fresno Slough Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	

Eagle Field Water District	Date:	Pacheco Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	

Santa Nella County Water District	Date:	Mercy Springs Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	

County of Merced	Date:	County of Fresno	Date: 8/21/18
Signature		Signature <i>Sal Quintero</i>	
Name of Representative:		Name of Representative: Sal Quintero	

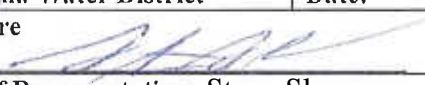
Oro Loma Water District	Date:		
Signature			
Name of Representative:			

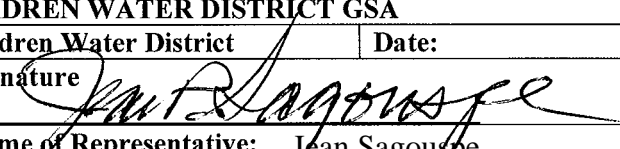
Widren Water District	Date:		
Signature			
Name of Representative:			

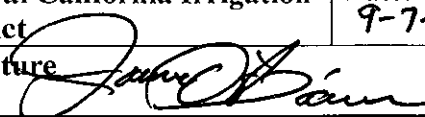


Central California Irrigation District	Date:	Columbia Canal Company	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	

Firebaugh Canal Company	Date:	San Luis Canal Company	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	

ATTEST:
 BERNICE E. SEIDEL
 Clerk of the Board of Supervisors
 County of Fresno, State of California
 By *Bernice E. Seidel* Deputy


NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced	Date:	County of Stanislaus	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District	Date:	Panoche Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District	Date:	Fresno Slough Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Eagle Field Water District	Date:	Pacheco Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Santa Nella County Water District	Date:	Mercy Springs Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced	Date:	County of Fresno	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District	Date:		
Signature 			
Name of Representative: Steve Sloan			
WIDREN WATER DISTRICT GSA			
Widren Water District	Date:		
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District	Date:	Columbia Canal Company	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Firebaugh Canal Company	Date:	San Luis Canal Company	Date:
Signature		Signature	


NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced	Date:	County of Stanislaus	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District	Date:	Panoche Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District	Date:	Fresno Slough Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Eagle Field Water District	Date:	Pacheco Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Santa Nella County Water District	Date:	Mercy Springs Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced	Date:	County of Fresno	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District	Date:		
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District	Date:		
Signature 			
Name of Representative: Jean Sagoupe			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District	Date:	Columbia Canal Company	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Firebaugh Canal Company	Date:	San Luis Canal Company	Date:
Signature		Signature	


NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced	Date:	County of Stanislaus	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District	Date:	Panoche Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District	Date:	Fresno Slough Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Eagle Field Water District	Date:	Pacheco Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Santa Nella County Water District	Date:	Mercy Springs Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced	Date:	County of Fresno	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District	Date:		
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District	Date:		
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District	Date: 9-7-2016	Columbia Canal Company	Date:
Signature 		Signature	
Name of Representative: James O'Banion		Name of Representative:	
Firebaugh Canal Company	Date:	San Luis Canal Company	Date:
Signature 		Signature 	

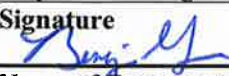
Mike Stearns

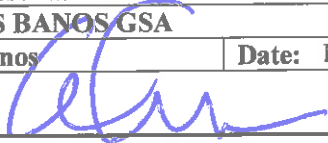
Jim Nickel

NORTHWESTERN DELTA-MENDOTA GSA			
County of Merced	Date:	County of Stanislaus	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
CENTRAL DELTA-MENDOTA REGION MULTI-AGENCY GSA			
San Luis Water District	Date:	Panoche Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Tranquillity Irrigation District	Date:	Fresno Slough Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Eagle Field Water District	Date:	Pacheco Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
Santa Nella County Water District	Date:	Mercy Springs Water District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
County of Merced	Date:	County of Fresno	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
ORO LOMA WATER DISTRICT GSA			
Oro Loma Water District	Date:		
Signature			
Name of Representative:			
WIDREN WATER DISTRICT GSA			
Widren Water District	Date:		
Signature			
Name of Representative:			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GSA			
Central California Irrigation District	Date:	Columbia Canal Company	Date:
Signature		Signature 	
Name of Representative:		Name of Representative: Kimberly Brown	
Firebaugh Canal Company	Date:	San Luis Canal Company	Date:
Signature		Signature	

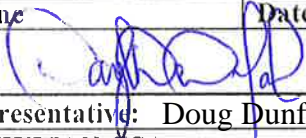
Name of Representative:		Name of Representative:	
TURNER ISLAND WATER DISTRICT -2 GSA			
Turner Island Water District		Date: 8/6/2018	
Signature  President			
Name of Representative: DONALD SKINNER, President			
CITY OF MENDOTA GSA			
City of Mendota		Date:	
Signature			
Name of Representative:			
CITY OF FIREBAUGH GSA			
City of Firebaugh		Date:	
Signature			
Name of Representative:			
CITY OF LOS BANOS GSA			
City of Los Banos		Date:	
Signature			
Name of Representative:			
CITY OF DOS PALOS GSA			
City of Dos Palos		Date:	
Signature			
Name of Representative:			
CITY OF GUSTINE GSA			
City of Gustine		Date:	
Signature			
Name of Representative:			
CITY OF NEWMAN GSA			
City of Newman		Date:	
Signature			
Name of Representative:			
COUNTY OF MADERA-3 GSA			
County of Madera		Date:	
Signature			
Name of Representative:			
COUNTY OF MERCED DELTA-MENDOTA GSA			
County of Merced		Date:	
Signature			
Name of Representative:			


Name of Representative:		Name of Representative:	
TURNER ISLAND WATER DISTRICT -2 GSA			
Turner Island Water District		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF MENDOTA GSA			
City of Mendota		Date: 12/12/16	
Signature 			
Name of Representative: Cristian Gonzalez		Name of Representative:	
CITY OF FIREBAUGH GSA			
City of Firebaugh		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF LOS BANOS GSA			
City of Los Banos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF DOS PALOS GSA			
City of Dos Palos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF GUSTINE GSA			
City of Gustine		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF NEWMAN GSA			
City of Newman		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MADERA-3 GSA			
County of Madera		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MERCED DELTA-MENDOTA GSA			
County of Merced		Date:	
Signature			
Name of Representative:		Name of Representative:	


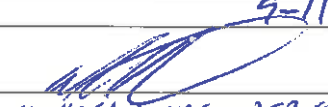
Name of Representative:		Name of Representative:	
TURNER ISLAND WATER DISTRICT -2 GSA			
Turner Island Water District		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF MENDOTA GSA			
City of Mendota		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF FIREBAUGH GSA			
City of Firebaugh		Date: 9-25-18	
Signature 			
Name of Representative: Ben Gallegos		Name of Representative:	
CITY OF LOS BANOS GSA			
City of Los Banos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF DOS PALOS GSA			
City of Dos Palos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF GUSTINE GSA			
City of Gustine		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF NEWMAN GSA			
City of Newman		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MADERA-3 GSA			
County of Madera		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MERCED DELTA-MENDOTA GSA			
County of Merced		Date:	
Signature			
Name of Representative:		Name of Representative:	

Name of Representative:		Name of Representative:
TURNER ISLAND WATER DISTRICT -2 GSA		
Turner Island Water District	Date:	
Signature		
Name of Representative:		
CITY OF MENDOTA GSA		
City of Mendota	Date:	
Signature		
Name of Representative:		
CITY OF FIREBAUGH GSA		
City of Firebaugh	Date:	
Signature		
Name of Representative:		
CITY OF LOS BANOS GSA		
City of Los Banos	Date: November 14, 2018	
Signature 		
Name of Representative: Alex Terrazas, City Manager		
CITY OF DOS PALOS GSA		
City of Dos Palos	Date:	
Signature		
Name of Representative:		
Name of Representative:		
Name of Representative:		
CITY OF GUSTINE GSA		
City of Gustine	Date:	
Signature		
Name of Representative:		
CITY OF NEWMAN GSA		
City of Newman	Date:	
Signature		
Name of Representative:		
COUNTY OF MADERA-3 GSA		
County of Madera	Date:	
Signature		
Name of Representative:		
COUNTY OF MERCED DELTA-MENDOTA GSA		
County of Merced	Date:	
Signature		
Name of Representative:		

Name of Representative:		Name of Representative:	
TURNER ISLAND WATER DISTRICT -2 GSA			
Turner Island Water District		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF MENDOTA GSA			
City of Mendota		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF FIREBAUGH GSA			
City of Firebaugh		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF LOS BANOS GSA			
City of Los Banos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF DOS PALOS GSA			
City of Dos Palos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF GUSTINE GSA			
City of Gustine		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF NEWMAN GSA			
City of Newman		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MADERA-3 GSA			
County of Madera		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MERCED DELTA-MENDOTA GSA			
County of Merced		Date:	
Signature			
Name of Representative:		Name of Representative:	
APRIL HOGUE			

Name of Representative:		Name of Representative:	
TURNER ISLAND WATER DISTRICT -2 GSA			
Turner Island Water District		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF MENDOTA GSA			
City of Mendota		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF FIREBAUGH GSA			
City of Firebaugh		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF LOS BANOS GSA			
City of Los Banos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF DOS PALOS GSA			
City of Dos Palos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF GUSTINE GSA			
City of Gustine		Date: September 18, 2018	
Signature 			
Name of Representative: Doug Dunford		Name of Representative:	
CITY OF NEWMAN GSA			
City of Newman		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MADERA-3 GSA			
County of Madera		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MERCED DELTA-MENDOTA GSA			
County of Merced		Date:	
Signature			
Name of Representative:		Name of Representative:	

Name of Representative:		Name of Representative:	
TURNER ISLAND WATER DISTRICT -2 GSA			
Turner Island Water District		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF MENDOTA GSA			
City of Mendota		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF FIREBAUGH GSA			
City of Firebaugh		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF LOS BANOS GSA			
City of Los Banos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF DOS PALOS GSA			
City of Dos Palos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF GUSTINE GSA			
City of Gustine		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF NEWMAN GSA			
City of Newman		Date: 15 AUG 18	
Signature 			
Name of Representative: Michael E. Holland		Name of Representative:	
COUNTY OF MADERA-3 GSA			
County of Madera		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MERCED DELTA-MENDOTA GSA			
County of Merced		Date:	

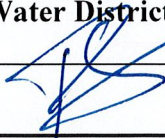

Name of Representative:		Name of Representative:	
TURNER ISLAND WATER DISTRICT -2 GSA			
Turner Island Water District		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF MENDOTA GSA			
City of Mendota		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF FIREBAUGH GSA			
City of Firebaugh		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF LOS BANOS GSA			
City of Los Banos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF DOS PALOS GSA			
City of Dos Palos		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF GUSTINE GSA			
City of Gustine		Date:	
Signature			
Name of Representative:		Name of Representative:	
CITY OF NEWMAN GSA			
City of Newman		Date:	
Signature			
Name of Representative:		Name of Representative:	
COUNTY OF MADERA-3 GSA			
County of Madera		Date: 10-02-2018	
Signature 		Date: 9-11-18	
Name of Representative: Tom Wheeler			
COUNTY OF MERCED DELTA-MENDOTA GSA			
County of Merced		Date:	
Signature			
Name of Representative:		Name of Representative:	

MICHAEL TUMPSON, PER COUNTY COUNSEL

COUNTY OF MERCED DELTA-MENDOTA GSA			
County of Merced		Date: 7/31/18	
Signature <i>Jerald R. O'Banion</i>			
Name of Representative: Jerald R. O'Banion			
GRASSLAND WATER DISTRICT GSA			
Grassland Water District		Date:	Grassland Resource Conservation District
Signature		Signature	
Name of Representative:		Name of Representative:	
FARMERS WATER DISTRICT GSA			
Farmers Water District		Date:	
Signature			
Name of Representative:			
FRESNO COUNTY GSA			
County of Fresno		Date:	
Signature			
Name of Representative:			
ALISO WATER DISTRICT GSA			
Aliso Water District		Date:	
Signature			
Name of Representative:			

EXECUTING NOT AS A PARTY:

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY	
San Luis & Delta-Mendota Water Authority	Date:
Signature	
Name of Representative:	

GRASSLAND WATER DISTRICT GSA			
Grassland Water District	Date: 7-10-2018	Grassland Resource Conservation District	Date: 7-10-2018
Signature 		Signature 	
Name of Representative: Pepper Snyder		Name of Representative: Dennis Campini	
FARMERS WATER DISTRICT GSA			
Farmers Water District	Date:		
Signature			
Name of Representative:			
FRESNO COUNTY MANAGEMENT AREA A and B GSAs			
County of Fresno	Date:		
Signature			
Name of Representative:			
ALISO WATER DISTRICT GSA			
Aliso Water District	Date:		
Signature			
Name of Representative:			

EXECUTING NOT AS A PARTY:

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY	
San Luis & Delta-Mendota Water Authority	Date:
Signature	
Name of Representative:	

GRASSLAND WATER DISTRICT GSA			
Grassland Water District	Date:	Grassland Resource Conservation District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
FARMERS WATER DISTRICT GSA			
Farmers Water District	Date:	9-14-18	
Signature			
<i>[Handwritten Signature]</i>			
Name of Representative:			
JIM STILLWELL			
FRESNO COUNTY MANAGEMENT AREA A and B GSAs			
County of Fresno	Date:		
Signature			
Name of Representative:			
ALISO WATER DISTRICT GSA			
Aliso Water District	Date:		
Signature			
Name of Representative:			

EXECUTING NOT AS A PARTY:

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY	
San Luis & Delta-Mendota Water Authority	Date:
Signature	
Name of Representative:	

GRASSLAND WATER DISTRICT GSA			
Grassland Water District	Date:	Grassland Resource Conservation District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
FARMERS WATER DISTRICT GSA			
Farmers Water District	Date:		
Signature			
Name of Representative:			
FRESNO COUNTY MANAGEMENT AREA A and B GSAs			
County of Fresno	Date:	August 21, 2018	
Signature		ATTEST: BERNICE E. SEIDEL Clerk of the Board of Supervisors County of Fresno, State of California	
Name of Representative: Sal Quintero		By: <i>[Signature]</i> Deputy	
ALISO WATER DISTRICT GSA			
Aliso Water District	Date:		
Signature			
Name of Representative:			

EXECUTING NOT AS A PARTY:

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY	
San Luis & Delta-Mendota Water Authority	Date:
Signature	
Name of Representative:	

GRASSLAND WATER DISTRICT GSA			
Grassland Water District	Date:	Grassland Resource Conservation District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
FARMERS WATER DISTRICT GSA			
Farmers Water District	Date:		
Signature			
Name of Representative:			
FRESNO COUNTY GSA			
County of Fresno	Date:		
Signature			
Name of Representative:			
ALISO WATER DISTRICT GSA			
Aliso Water District	Date:	10-23-18	
Signature <i>Roy Cotroneo</i>			
Name of Representative: ROY COTRONEO, BOARD PRESIDENT			

EXECUTING NOT AS A PARTY:

SAN LUIS & DELTA-MENDOTA WATER AUTHORITY	
San Luis & Delta-Mendota Water Authority	Date:
Signature	
Name of Representative:	

GRASSLAND WATER DISTRICT GSA			
Grassland Water District	Date:	Grassland Resource Conservation District	Date:
Signature		Signature	
Name of Representative:		Name of Representative:	
FARMERS WATER DISTRICT GSA			
Farmers Water District	Date:		
Signature			
Name of Representative:			
FRESNO COUNTY MANAGEMENT AREA A and B GSAs			
County of Fresno	Date:		
Signature			
Name of Representative:			
ALISO WATER DISTRICT GSA			
Aliso Water District	Date:		
Signature			
Name of Representative:			

EXECUTING NOT AS A PARTY:

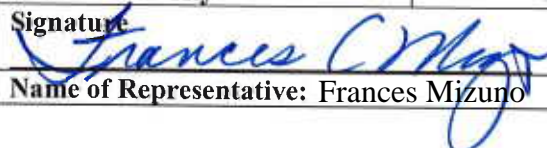
SAN LUIS & DELTA-MENDOTA WATER AUTHORITY	
San Luis & Delta-Mendota Water Authority	Date: 8/6/18
Signature 	
Name of Representative: Frances Mizuno	

EXHIBIT “A” – Groundwater Sustainability Plan (GSP) Groups

	Groundwater Sustainability Plan Group & Representation on Coordination Committee	Group Contact Agency	Participation Percentage
1	<p>Northern / Central Delta-Mendota Region – 2 Representatives</p> <p>Central DM Subgroup – 1 Member representing the following:</p> <ul style="list-style-type: none"> Central Delta-Mendota Multi-Agency GSA Oro Loma Water District GSA Widren Water District GSA <p>Northern DM Subgroup – 1 Member representing the following:</p> <ul style="list-style-type: none"> City of Patterson GSA DM-II GSA Northwestern Delta-Mendota GSA Oak Flat Water District GSA Patterson Irrigation District GSA West Stanislaus Irrigation District GSA 	West Stanislaus Irrigation District	16.7%
2	<p>San Joaquin River Exchange Contractors – 2 Representatives</p> <ul style="list-style-type: none"> City of Dos Palos GSA City of Firebaugh GSA City of Gustine GSA City of Los Banos GSA City of Mendota GSA City of Newman GSA Madera County GSA Merced County Delta-Mendota GSA San Joaquin River Exchange Contractors GSA Turner Island Water District-2 GSA 	San Joaquin River Exchange Contractors	16.7%
3	<p>Farmers Water District – 1 Representative</p> <ul style="list-style-type: none"> Farmers Water District GSA 	Farmers Water District	16.7%

4	Aliso Water District – 1 Representative Aliso Water District GSA	Aliso Water District	16.7%
5	Grassland Water District – 1 Representative Grassland Water District GSA Grassland WD and Grassland Resource Conservation District Merced County Delta-Mendota GSA	Grassland Water District	16.7%
6	Fresno County Management Area A & B – -1 Representatives Fresno County Management Area A GSA Fresno County Management Area B GSA	Fresno County	16.7%

APPENDIX – SGMA DEFINITIONS

1. “**Agency**” or “**GSA**” shall mean a groundwater sustainability agency as defined in SGMA.
2. “**Coordination Agreement**” shall mean this Coordination Agreement, unless indicated otherwise.
3. “**Annual Report**” shall mean the report required by Water Code Section 10728 and SGMA Regulations Section 356.2.
4. “**Basin**” shall mean the Delta-Mendota subbasin and defined in Bulletin 118 as Basin 5- 22.07; for purposes of the Coordination Agreement, “Basin” and “Subbasin shall have the same meaning.
5. “**Basin Setting**” shall mean the information about the physical setting, characteristics, and current conditions of the basin as described by the Agency in the hydrogeologic conceptual model, the groundwater conditions, and the water budget, pursuant to California Code of Regulations, title 23, sections 354.12-354.20.
6. “**CASGEM**” shall mean the California Statewide Groundwater Elevation Monitoring Program developed by the DWR.
7. “**DWR**” shall mean the Department of Water Resources.
8. “**Groundwater**” shall mean the water beneath the surface of the earth within the zone below the water table in which the soil is completely saturated with water, but does not include water that flows in known and definite channels.
9. “**Groundwater flow**” shall mean the volume and direction of groundwater movement into, out of, or throughout a basin.
10. “**Interconnected surface water**” shall mean the surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted.
11. “**Measureable objectives**” shall mean specific, quantifiable goals for the maintenance or improvement of specified groundwater conditions that have been included in an adopted GSP to achieve the sustainability goal for the basin.

12. “**Principal Aquifers**” shall mean aquifers or aquifer systems that store, transmit, and yield significant or economic quantities of groundwater to wells, springs, or surface water systems.
13. “**Representative Monitoring**” shall mean a monitoring site within a broader network of sites that typifies one or more conditions within the basin or an area of the basin.
14. “**Sustainability Indicator**” shall mean any of the effects caused by groundwater conditions occurring throughout the basin that, when significant and unreasonable, cause undesirable results.
15. “**Water Source Type**” shall mean the source from which water is derived to meet the applied beneficial uses, including groundwater, precipitation, recycled water, reused water, and surface water sources.
16. “**Water Use Sector**” shall mean categories of water demand based on the general land uses to which the water is applied, including urban, industrial, agricultural, managed wetlands, managed recharge, and native vegetation.

Appendix B - Common Technical Memoranda



TECHNICAL MEMORANDUM #1

RE: Common Datasets and Assumptions used in the Delta-Mendota Subbasin GSPs

PREPARED BY: Woodard & Curran

DATE: July 25, 2019

During development of the six coordinated Groundwater Sustainability Plans (GSPs) for the Delta-Mendota Subbasin (Subbasin), the twenty-three Groundwater Sustainability Agencies (GSAs) in the Subbasin agreed upon methodologies and assumptions for water budgets, change in storage, and sustainable yield. The common data and methodologies required in Water Code Section 10727.6 and Title 23, California Code of Regulations, Section 357.4 to prepare coordinated plans and utilized in preparation of the Delta-Mendota Subbasin GSPs are set forth in Technical Memoranda. Each of the individual Memoranda satisfies a requirement agreed upon in the Coordination Agreement and, collectively when combined with the Coordination Agreement, provides an explanation of how the six Subbasin GSPs implemented together satisfy the requirements of the Sustainable Groundwater Management Act (SGMA) for the entire Subbasin.

The Technical Memoranda will be utilized by the Coordination Agreement Parties (representing the twenty-three GSAs in the Subbasin) during the implementation of their GSPs in order to ensure coordination of the GSPs. The Coordination Committee is responsible for ongoing review and updating of the Technical Memoranda, as needed, during GSP implementation.

The following datasets and assumptions were used in a coordinated fashion by those preparing the six GSP for the Delta-Mendota Subbasin. These data sets and assumptions were agreed upon by the Delta-Mendota Subbasin Technical Working Group and approved by the Delta-Mendota Coordination Committee over the period extending from December 2017 through June 2019.

1. DATASETS

The technical development for the six GSPs in the Subbasin relied on the best available data for their respective Plan areas. The following outlines common datasets and instances of localized data use during the development of the GSPs.

Groundwater Level Data and Contour Mapping

1. Subbasin-wide groundwater level contour maps for the upper aquifer were developed for the selected historic water budget period (Spring 2003 and 2012) and current water budget period (Spring 2013 and Fall 2013). Contours were developed for the upper aquifer for the years identified. Thirty-foot contour intervals were used; individual GSAs compromised on this contour spacing following initial attempts at smaller contours due to variability in data. The lower aquifer's historic water surface elevation (WSE) data inventory was too limited to develop groundwater level contours for the entire Subbasin and is anticipated to be addressed in future GSPs and annual reports as these data gaps are addressed. Water level contour maps were composed from the following data sources:
 - i. California Department of Water Resources (DWR):
 1. California Statewide Groundwater Elevation Monitoring (CASGEM) Program
 2. Water Data Library (WDL)
 - ii. Water level data from local monitoring programs.

2. Subbasin-wide change in storage was evaluated for the upper aquifer using annual groundwater contour maps from Spring 2003 to Spring 2013 developed from the same datasets identified above and compared to each GSP's change in groundwater storage as calculated from historic and current water budgets for consistency. Change in storage for the lower aquifer was evaluated using specific yield and historic land subsidence provided by each GSP Group along with change in groundwater levels and storativity where lower aquifer groundwater level data were available. Datasets used to assess subsidence are discussed below.

Subsidence

3. Each GSP Group determined the historic rate of subsidence in their respective Plan area using the following data sources and period of record. The subsidence rates were combined using a 'sum-of-the-parts' methodology to develop an understanding of subsidence in the Subbasin.
 - a. Aliso Water District GSP: United States Bureau of Reclamation (USBR) San Joaquin River Restoration Program (SJRRP) 2011-2017.
 - b. Farmers Water District GSP: United States Geological Survey (USGS) and University-NAVSTAR Consortium (UNAVCO) 2004-2017.
 - c. Fresno Management Areas A & B GSP: USGS and UNAVCO 2004-2017.
 - d. Grassland GSP: USBR 2011-2017 with Ken D. Schmidt & Associates (KDSA) edits.
 - e. Northern & Central Delta-Mendota GSP (without Tranquillity Irrigation District): USBR's Delta-Mendota Canal subsidence surveys interpolated from 1984 to 2014 (Pools 3 through 18) as well as the Department of Water Resources 2017 CA Aqueduct Subsidence Study.
 - f. Northern & Central Delta-Mendota GSP (Tranquillity Irrigation District): Tranquillity Irrigation District's (TRID) local subsidence data from 2014 to 2018.
 - g. San Joaquin River Exchange Contractors GSP: USBR's SJRRP subsidence monitoring network, USBR's Delta-Mendota Canal subsidence survey data, USGS continuous monitoring sites (including extensometers and CPGS sites), and local surveying data for years 2003-2012, 2013, and 2014-2018.

Water Budgets

4. Each GSP group developed Historic, Current, and Projected Water Budgets using the best available local and publicly available data for their respective Plan area. The six individually-developed water budgets were compared and combined for the Delta-Mendota Subbasin water budgets. Instances in which common data sources were used are as follows:
 - a. The Historic, Current, and Projected Water Budgets relied on a common data source for water year type; the California Data Exchange Center (CDEC): San Joaquin River Index was used. The San Joaquin River Exchange Contractors water year type behavior is influenced by inflow to Shasta Reservoir, as does the managed wetlands in the Grassland GSP area that have federal contracts for refuge water supplies. Therefore, the Full Natural Flow (FNF) into Shasta Reservoir was considered to refine the water year type to distinguish between a critically dry year under the San Joaquin River Index and a critically dry year with reduced surface water deliveries to the San Joaquin River Exchange Contractors and the refuges due to a critical year under the Exchange Contract and refuge contracts (reduced inflows to Shasta Reservoir).
 - b. The six GSP Groups also coordinated the use of DWR's 2030 and 2070 Climate Change Factors (CCF or CCFs) for the Projected Water Budget.

Groundwater Dependent Ecosystems

5. Groundwater Dependent Ecosystems (GDEs) were evaluated by each GSP Group. The Natural Communities (NC) Dataset Viewer's GDE delineations, produced by The Nature Conservancy (TNC) in partnership with the Department of Fish and Wildlife and DWR, was reviewed and vetted using the following data sources:

- a. Aliso Water District GSP, Farmers Water District GSP, Fresno Management Areas A & B GSP, Northern & Central Delta-Mendota Regions GSP, and the San Joaquin River Exchange Contractors GSP used 2015 groundwater contours comprised of local and DWR's WDL depth to water data.
- b. Grassland GSP used current Ducks Unlimited Wetland Inventory data for the Wetland GDE map, because the NC Dataset for wetland GDEs in this unique wetland habitat area is not accurate. The Wetland GDE map assumes that all wetlands identified by Ducks Unlimited are possible GDEs, and the Vegetative GDE map assumes that all TNC-delineated Vegetative GDEs are possible GDEs. The GSP Groups reserve the opportunity to gather more local data to refine the GDE maps in future updates.
- c. Northern & Central Delta-Mendota Regions GSP used aerial satellite photos and field verification at locations with infrastructure, farms, ditches and canals, etc. to ground-truth the GDE data produced by TNC.

2. ASSUMPTIONS

Coordination and limited data required assumptions to be made to meet GSP requirements. Assumptions that affected the Delta-Mendota Subbasin's coordinated effort are outlined below along with the data and methodologies applied. The basis upon which the methodologies and assumptions were developed includes data and information provided by local agencies, State and federal data, best management practices, and/or best modeled or projected data available.

Mapping

1. Historic WSE Mapping – Assumed accurate and best available locally provided data

- a. Upper Aquifer
 - i. Spring 2003 and Spring 2013 WSE contours were developed for the upper aquifer using datasets identified in item 1.1 above. Spring data was defined as being measured from January 1 through April 8.
 - ii. The groundwater levels at individual wells were plotted for both Spring 2003 and Spring 2013. Contours were refined by Luhdorff & Scalmanini, Consulting Engineers (LSCE) in the southern portion of the Subbasin and by KDSA for the entire Delta-Mendota Subbasin.
 - iii. The Spring 2003 and 2013 surfaces were overlaid to produce a change in groundwater level map for the historic period.
 - iv. The contour maps for the upper aquifer were developed on the following dates:
 1. UPPER Change Spring 2003 vs. 2013 – Last edited February 7, 2019
 2. UPPER Spring 2003 – Last edited February 6, 2019
 3. UPPER Spring 2013 – Last edited February 6, 2019
- a. Lower Aquifer
 - i. All available wells from the inventory identified in the datasets section above that had lower aquifer WSE readings in Spring 2013 and Fall 2013 were used to generate two maps showing lower aquifer 2003 and 2013 water levels (WSE values at individual wells). The spatial coverage was insufficient for contouring due to the distribution aligning linearly

along the Delta-Mendota Canal and the limited well count. This effort was ultimately determined to be a data gap by the Technical Working Group on January 15, 2019.

1. Spring 2013: 37 water elevation measurements
2. Fall 2013: 48 water elevation measurements
3. Final maps for depiction of the lack of coverage and to meet GSP regulations were developed on February 6, 2019. Contours were unable to be developed for reasons noted above. Data will be collected in the future allowing for the development of lower aquifer contour maps as required in future annual reports.

2. Current WSE Mapping – Assumed accurate and best available locally provided data

a. Upper Aquifer

- i. The upper aquifer Spring 2013 contour map developed on February 6, 2019 was also used to meet the requirements of the Current WSE contour maps. An additional upper aquifer Fall 2013 contour map was developed on March 1, 2019 using similar methodology and data from September 1 to October 31.

b. Lower Aquifer

- i. As with the determination for the historic period, the spatial coverage was insufficient, and this effort has been determined to be a data gap by the Technical Working Group on January 15, 2019.

3. Groundwater Extraction Data

Extraction data were estimated or measured by local GSAs for use in the development of individual GSPs. Groundwater extraction volumes used for the Delta-Mendota Subbasin water budgets were compiled from the six individual GSP water budgets.

4. Surface Water Supply

Surface Water Supply allocations, deliveries, imports, and projected supplies were provided or estimated by local GSAs for use in the development of individual GSPs. Applied surface water volumes used for the Delta-Mendota Subbasin water budgets were compiled from the six individual GSP water budgets.

5. Total Water Use

Total Water Use was estimated or measured by local GSAs for use in the development of individual GSPs. Total water use included in the Delta-Mendota Subbasin water budgets was compiled from the individual GSP water budgets.

6. Change in Groundwater Storage

a. Upper Aquifer

- i. Upper aquifer change in groundwater storage was evaluated using annual groundwater level contours from Spring 2003 to Spring 2013 developed using the same datasets identified above and applying specific yield (defined as the volume of water released from storage by an unconfined aquifer per unit surface area of aquifer per unit decline of the water table) provided by each individual GSP Group. The Delta-Mendota Subbasin upper aquifer change in groundwater storage assessment considered a 'sum-of-the-parts' methodology, combining the change in groundwater storage for each GSP to determine the overall change in groundwater storage for the Subbasin.

b. Lower Aquifer

- i. On January 15, 2019, the Technical Working Group discussed addressing the historic period change in groundwater storage in the lower aquifer. Instead of using scarce data, the change was compared against loss of storage from inelastic land subsidence as calculated using change in land surface elevation multiplied by the area and supplemented by change in groundwater levels and storativity in areas of the Subbasin where those data were available.

7. GDEs

The Natural Communities Dataset Viewer's (NC Dataset Viewer) GDE delineations, produced by The Nature Conservancy (TNC) in partnership with the Department of Fish and Wildlife and DWR, were reviewed and vetted by each GSP Group. The primary reasons for not fully utilizing the NC Dataset Viewer GDE delineations were as follows: (1) A mapping error was identified, noting the land use is incompatible with the presence of GDEs; (2) for wetlands within the Grassland GSP, a more accurate and comprehensive wetland data set was available; and (3) The depth to groundwater exceeds 30 feet. The 30-foot criterion was used with the understanding that the deepest rooting depth of a vegetative GDE identified in NC Dataset Viewer is 30 feet, and further refined using effective rooting depths published by TNC. The GDE determinations and Spring 2015 depth to groundwater contours were compiled into a Wetland GDE map and Vegetative GDE map on May 29, 2019 and approved by the Subbasin Coordination Committee

The methods for GDE determinations are as follows.

- a. Aliso Water District GSP:
 - i. Spring 2013 and 2015 groundwater contours were assessed in Aliso Water District to evaluate areas in which the depth to water exceeded 30 feet, demonstrating unsuitable hydrologic conditions for vegetative or wetland GDEs. Aliso WD GSP's GDE determinations remained constant when using either Spring 2013 or Spring 2015 water levels for consideration.
 - ii. GDEs identified within a 100-foot buffer from the San Joaquin River remained "Possible GDEs," as consistent with a typical wetland setback standard used by CalTrans. (See the Aliso Water District GSP for detailed references relating to this standard.)
- b. Farmers Water District GSP:
 - i. Using GIS, Spring 2015 groundwater elevation contours were overlain on the TNC GDE delineations identified in Farmers Water District to evaluate areas in which the depth to water exceeded 30 feet, demonstrating unsuitable hydrologic conditions for vegetative or wetland GDEs.
 - ii. Local understanding of recent land use was also considered when vetting the TNC GDE delineations.
- c. Fresno Management Areas A & B GSP:
 - i. Spring 2015 groundwater contours were overlain on the TNC GDE delineations used for Fresno Management Areas A & B to evaluate areas in which the depth to water exceeded 30 feet, demonstrating unsuitable hydrologic conditions for vegetative or wetland GDEs.
 - ii. Local understanding of recent land use was also considered when vetting the TNC GDE delineations.

- d. Grassland GSP:
 - i. The Ducks Unlimited Wetland Inventory data were used in place of TNC GDE delineations for the identification of possible Wetland GDEs, with the understanding that the TNC GDE delineations for wetlands did not cover the full extent of wetlands in the Grassland Plan area. The Ducks Unlimited wetland delineations were more comprehensive and were developed with ground-truthing surveys which improved accuracy. This deviation in the use of a common dataset for the Subbasin was necessary as this GSP Plan area contains extensive acres of heavily vegetated, shallow seasonal wetlands and therefore required a supplemental approach to GDE delineation beyond the TNC GDE delineation.
 - ii. All TNC Vegetative GDEs were also considered “Possible GDEs” and the Grassland GSP Group recognizes the opportunity to gather more local data to refine this position in future GSP updates, if applicable.
- e. Northern & Central Delta-Mendota Regions GSP:
 - i. Spring 2015 groundwater elevation contours were overlain on the TNC GDE delineations to identify areas in which the depth to water exceeded 30 feet, demonstrating unsuitable hydrologic conditions for vegetative or wetland GDEs.
 - ii. GDEs identified within a 100-foot buffer from the San Joaquin River remained “Possible GDEs,” as consistent with a typical wetland setback standard in California.^{1,2}
 - iii. Local understanding of recent land use was also considered when vetting the TNC GDEs.
- f. San Joaquin River Exchange Contractors GSP:
 - i. Aerial imagery was reviewed for possible mapping errors based on land use and infrastructure. Remaining potential GDE’s used Spring 2015 groundwater contours to identify areas in which the groundwater level exceeded the effective rooting depth published by TNC.

8. Subsidence

- a. NASA JPL and USBR subsidence maps were provided to the Technical Working Group on October 16th, 2018.
 - i. These maps were used for discussion purposes.
- b. Subsidence values were produced by each GSP Group, using the most temporally and spatially representative data for their respective GSP on February 7, 2019. The GSP-specific subsidence values are listed in the table below. See the individual GSPs for more detailed information as to how the GSP-specific subsidence values were derived.

GSP Region	Subsidence Rate	Units	Rate	Period of Record	Source	Additional Notes
Aliso	0.15	ft/year	Annual	2011-2017	USBR	Local Surveys and SJRRP monitoring data
Farmers	0.689	ft	Cumulative	2004-2017	USGS and UNAVCO	USGS Fordel-upper aquifer Compaction, Total = 0.031 ft P304-Total Subsidence = 0.72 ft Lower aquifer Compaction, Total = 0.689 ft
Fresno	0.689	ft	Cumulative	2004-2017	USGS and UNAVCO	USGS Fordel-upper aquifer Compaction, Total = 0.031 ft P304-Total Subsidence = 0.72 ft Lower aquifer Compaction, Total = 0.689 ft
Grassland	0.075	ft/year	Annual	2011-2017	USBR and KDSA	The estimated rate of subsidence is based on monitoring points outside of the GSA and therefore has not been verified; Initial data came from USBR, KDSA provided edits to that data.
Northern & Central	Varies by DMC Pool, ranges from 0.7 to -0.88	ft	Cumulative	2003-2013	SLDMWA	Interpolated from 1984 and 2014 Subsidence Surveys for Pools 3-18
Northern & Central	0.53	ft/year	Annual	2014-2018	TRID	Survey data
San Joaquin River Exchange Contractors	0.35	ft	Cumulative	2003-2012	Various datasets	Local surveys, CGPS/CORS/Extensometer data, SJRRP monitoring data, DMC surveys

HCM/Groundwater Conditions

- Four distinct hydrogeologic layers were initially identified for the Hydrogeological Conceptual Model: shallow layer (0-30 ft), medium layer (30 ft – top of Corcoran Clay), Corcoran Clay, and below Corcoran Clay. However, given that some areas in the Subbasin have more complex hydrogeology than others, these layers were consolidated to three regionally-recognized hydrogeologic features with management areas used further define localized hydrogeologic complexities as needed for SGMA compliance. At the Subbasin level, the three regionally-recognized hydrogeologic features are two principle aquifers – an upper aquifer (unconfined to semi-confined above the Corcoran Clay) and a lower aquifer (confined below the Corcoran Clay), and the intervening regional aquitard known as the Corcoran Clay. This hydrogeologic conceptual model was recommended by the Technical Working Group and approved by the Coordination Committee.
- SGMA requires a description of the definable bottom of the basin (§354.14 of the GSP Emergency Regulations). The agreed-upon definable bottom of the basin for the Delta-Mendota Subbasin is the base of fresh water consistent with the published definition of the Base of Fresh Water found in R. W. Paige (USGS, Hydrologic Investigations Atlas HA-489, 1973), defined as >3,000 micromhos/cm [$\mu\text{mhos/cm}$] at 25°C.
- The current year (2013) seasonal high (spring) ranges from January to April, and seasonal low (fall) ranges from August to October. Data collected during these periods were used for WSE mapping.
- Data collected during the aforementioned period (as noted in #3, above) were used to prepare water surface contour maps for the upper aquifer. No water surface elevation contour maps were prepared for the lower aquifer for 2013 Fall and Spring (as required by the GSP regulations) due to a lack of aquifer-specific data in most areas of the Subbasin. However, lower aquifer data collected during the aforementioned period were plotted on maps in lieu of the required contour maps. Woodard & Curran / Provost & Pritchard prepared 2013 Fall and Spring WSE contouring for the upper aquifer.

5. Timeframe for upper aquifer WSE mapping defined spring as January 1st to April 8th and fall as September 1st to October 31st.
6. The water year types for water year (WY) 2011 (wet water year), WY2012 (dry water year), and WY2015 (Shasta dry/critical water year) were used to compare WSE maps between GSP Plan areas.
7. Kenneth D. Schmidt & Associate's (KDSA) mapping of interconnected reaches of the San Joaquin River (SJR) based on the SJRRP was used for areas within the SJREC and Grassland GSP Plan areas. A table is included in the Common Chapter showing which SJR reaches are within each GSP Plan area and whether those reaches are gaining or losing. For other GSP Plan areas adjacent to the San Joaquin River, determinations of interconnectedness were provided by those preparing individual GSPs.

Water Budget

1. Historic Water Budget

The historic period was defined as WY2003 through WY2012 by the Technical Working Group on August 8, 2018 and confirmed by the Coordination Committee on August 13, 2018. The historic water budget period was ratified by the Coordination Committee on January 14, 2019 following the Coordination Agreement and Cost Share Agreement being finalized on December 12, 2018.

Each GSP Group determined the surface and groundwater inputs and outputs using the best available public and local data for each respective GSP Plan area. The historic water budget was split into 1) a land interactions water budget and 2) a groundwater budget. The parameters that each GSP Group evaluated were coordinated and summed to develop the Subbasin-wide water budget used to assess the change in storage in the upper aquifer for each GSP Group on February 15, 2019. For details regarding the approach to developing the Subbasin water budgets using numerical and non-numerical tools and the associated discussions with DWR staff, see Technical Memorandum #3 – Assumptions for the Historic, Current and Projected Water Budgets of the Delta-Mendota Subbasin, Change in Storage Cross-Check, and Sustainable Yield.

The change in lower aquifer groundwater storage considered the best available subsidence data per GSP Group and the respective specific yield. The lower aquifer change in storage for the Subbasin total was compiled on February 15, 2019.

2. Current Water Budget

The current Water Budget follows similar methodology to the historic water budgets for both upper and lower aquifer change in groundwater storage. The current period was defined as WY2013 by the Technical Working Group on August 8, 2018 and confirmed by the Coordination Committee on August 13, 2018. The current water budget period was formally ratified by the Coordination Committee on January 14, 2019 following the Coordination Agreement and Cost Share Agreement being finalized on December 12, 2018.

3. Projected Water Budget

Each GSP Group developed their own projected water budgets, using a similar comparison strategy to the historic and coordinated water budgets. The Subbasin-wide projected water budget was presented to the Technical Working Group and Coordination Committees on April 1, 2019. For more details regarding determinations of the projected water budget period and associated representative water years, see Technical Memorandum #3 – Assumptions for the Historic, Current and Projected Water Budgets of the Delta-Mendota Subbasin, Change in Storage Cross-Check, and Sustainable Yield.

The representative period, functioning as surrogate years, for a 50(+)-year historic period (WY2014-2070) was proposed by the Technical Working Group on January 15, 2019. Use of DWR's CCF modeling was also coordinated for changes in precipitation, evapotranspiration and streamflows.

For years 1 through 4 of the projected water budgets (WY2014 through WY2017), actual data were used and no CCF's were applied. Water year types are based on the SJR index except for Shasta Critical years. The following water year types will therefore be used: Shasta Critical, Critical, Dry, Below Normal, Above Normal, and Wet, with all designations based on the San Joaquin River Index except Shasta Critical, which is defined by Shasta indices under the Exchange Contract and refuge water supply contracts. For the projected simulation, four water year types were used for representative water years: Average (above or below normal), Dry (dry or critical), Wet and Shasta Critical.

Climate Change Factors for precipitation and evapotranspiration (ET) were applied considering representative historical water years surrogating for the future year until 2070. Fifty-three years of historical data (1965-2017) were used to model the projected water budget. However, to better match the existing hydrologic cycle, the six GSP Groups decided to begin the projected period with the representative year of 1979 for WY2018 (versus 1965 for WY2018). The coordinated representative year pattern is as follows:

- 1979 data represents WY2018
- 1980 data represents WY2019 (and so on until WY2056)
and
- 1965 data represents WY2057
- 1966 data represents WY2058 (and so on until WY2070)

For years 38-43 (repeated WY2012-2017), the DWR model did not establish precipitation or ET CCF. The following CCFs for ET and precipitation were used:

- WY 2012 used 2001's 2070 CCF
- WY 2013 used 1992's 2070 CCF
- WY 2014 used 1976's 2070 CCF
- WY 2015 used 1977's 2070 CCF
- WY 2016 used 2002's 2070 CCF
- WY 2017 used 2011's 2070 CCF

For years 30 – 43 (repeated WY 2004-2017), the DWR modeling did not establish streamflow CCFs. For this reason, DWR suggested to use surrogate years' CCFs for the projection. The following CCFs were selected for streamflows:

- WY2004 used 2002's 2030 CCF
- WY2005 used 2002's 2030 CCF
- WY2006 used 1998's 2030 CCF
- WY2007 used 1992's 2070 CCF
- WY2008 used 1992's 2070 CCF
- WY2009 used 2002's 2070 CCF
- WY2010 used 2003's 2070 CCF
- WY2011 used 1997's 2070 CCF
- WY2012 used 1992's 2070 CCF
- WY2013 used 1992's 2070 CCF
- WY2014 used 1976's 2070 CCF
- WY2015 used 1977's 2070 CCF
- WY2016 used 2002's 2070 CCF
- WY2017 used 1998's 2070 CCF

9. Sustainable Yield

Methodologies for calculating upper aquifer sustainable yield were discussed by both the Coordination Committee and the Technical Working Group. After reviewing several options for this calculation, the Coordination Committee requested that the Technical Working Group further discuss potential options and provide a recommendation back to the Coordination Committee for adoption. On April 16, 2019, a joint workshop of the Coordination Committee and the Technical Working Group was held to discuss options for upper aquifer sustainable yield estimation and to identify a recommendation.

During the April workshop, several basic concepts and principles were discussed to calculate the upper aquifer sustainable yield value. Consideration was given to several potential options with increasing detail, including some combination of the following: total Subbasin upper aquifer pumping volumes, total Subbasin upper aquifer change in storage (which includes the effects of precipitation, evapotranspiration, and deep percolation), and Subbasin upper aquifer subsurface inflows and outflows. Inflow from certain neighboring subbasins, based on groundwater flow direction, as well as subsurface inflow from the Coast Range at existing gradients (as part of the inflow to the Northern & Central Delta-Mendota GSP area) was considered. Outflow to neighboring subbasins at existing gradients was also considered in certain applicable areas along the Delta-Mendota Subbasin boundary based on groundwater flow characteristics. Outflow from the Aliso GSP area, which lies east of the San Joaquin River, was not considered as outflow for purposes of developing these principles.

The formula for determining upper aquifer sustainable yield was applied to rolled-up Delta-Mendota Subbasin projected water budgets (WY2014-2070) in two categories:

- *Projected Baseline values with Climate Change Factors*
- *Projected Baseline values with Climate Change Factors and Projects and Management Actions*

If the projected baseline values for the Subbasin are expected to have undesirable results, the GSAs are required to implement projects or management actions that will offset the overdraft and result in a sustainable condition. The Technical Working Group recommended calculation of both a projected baseline for sustainable yield with applied climate change factors and a projected baseline for sustainable yield with climate change factors plus planned projects and management actions. Staff completed preliminary calculations for both baselines using average annual values from the Subbasin projected water budgets and following the formula below:

$$\text{Upper Aquifer Sustainable Yield} = \text{Pumping} + \text{Change in Storage} + (\text{Outflow} - \text{Inflow})$$

The Technical Working Group determined that a +/- 10% factor should be applied to determine a range for the upper aquifer sustainable yield value. The +/- 10% factor is applied based on the percentage difference between the values from change in storage contour mapping (prepared by Provost & Pritchard) and reported changes in storage from the Subbasin consolidated historic water budgets (WY2003-2012) for the upper aquifer.

In summary, the most detailed range for the upper aquifer sustainable yield is calculated using the above formula for both categories of water budgets: projected baseline with climate change factors and projected baseline with climate change factors plus projects and management actions. The 10% factor is applied to the results for both categories. This range aims to demonstrate the Subbasin's upper aquifer sustainable yield without implementing any projects and management actions (low end of range) and how the Subbasin's upper aquifer sustainable yield will be impacted by implementing planned projects and management actions (high end of range).

Within the Delta-Mendota Subbasin, the distribution of known lower aquifer water level data and extraction volume data are limited and not sufficient to allow for a calculation of lower aquifer sustainable yield. The Technical Working Group therefore look to studies and/or analysis conducted in adjoining subbasins with similar hydrogeologic conditions for consideration in developing a preliminary sustainable yield estimate. A recent study conducted in the adjoining Westside Subbasin was identified and selected for use in developing this preliminary estimate.

The Westlands Water District GSA completed a recent study using groundwater modeling, in conjunction with the Westside Subbasin GSP development, to estimate sustainable yield for that subbasin. An analysis of their data reflected an initial assumption of lower aquifer sustainable yield equivalent to approximately 0.35 acre-feet per acre within the Westside Subbasin (Westlands Water District GSA, *Groundwater Management Strategy Concepts* presentation to the WWD Board on October 16, 2018). Using this analysis, a slightly lower (and therefore more conservative) sustainable yield value for the lower aquifer was selected (0.33 acre-feet per acre), amounting to approximately 250,000 acre-feet per year over the approximately 750,000-acre Delta-Mendota Subbasin.

The lower criteria for a lower aquifer sustainable yield estimation compared to that considered by Westlands Water District reflects DWR's classification of the Delta-Mendota Subbasin as critically overdrafted due to the subsidence issues and was therefore considered to be more protective against the potential for future inelastic land subsidence. After more data are obtained in future years, the lower aquifer sustainable yield value may undergo revisions.

For both the upper and lower aquifer sustainable yield, the Delta-Mendota Coordination Committee acknowledges that sustainable management criteria will be the primary indicator for managing lower aquifer extractions.

10. Boundary Flows

Boundary flows were evaluated by comparing inflows and outflows assessed by each GSP Group's water budget analyses and associated data, as well as groundwater flow trends from groundwater contours and hydrogeologist input. Each set of neighboring GSP Groups had independent meetings to coordinate and compare their respective contributions to inflows and outflows, and the results were provided and discussed by the Delta-Mendota Subbasin's Technical Working Group and Coordination Committee. More details on the applicable datasets can be found in the water budgets and groundwater contours sections of this Technical Memo.

TECHNICAL MEMORANDUM #2

RE: Assumptions for Hydrogeological Conceptual Model of the Delta-Mendota Subbasin

PREPARED BY: Woodard & Curran

DATE: July 25, 2019

During development of the six coordinated Groundwater Sustainability Plans (GSPs) for the Delta-Mendota Subbasin (Subbasin), the twenty-three Groundwater Sustainability Agencies (GSAs) in the Subbasin agreed upon methodologies and assumptions for water budgets, change in storage, and sustainable yield. The common data and methodologies required in Water Code Section 10727.6 and Title 23, California Code of Regulations, Section 357.4 to prepare coordinated plans and utilized in preparation of the Delta-Mendota Subbasin GSPs are set forth in Technical Memoranda. Each of the individual Memoranda satisfies a requirement agreed upon in the Coordination Agreement and, collectively when combined with the Coordination Agreement, provides an explanation of how the six Subbasin GSPs implemented together satisfy the requirements of the Sustainable Groundwater Management Act (SGMA) for the entire Subbasin.

The Technical Memoranda will be utilized by the Coordination Agreement Parties (representing the twenty-three GSAs in the Subbasin) during the implementation of their GSPs in order to ensure coordination of the GSPs. The Coordination Committee is responsible for ongoing review and updating of the Technical Memoranda, as needed, during GSP implementation.

The following common assumptions for the Delta-Mendota Hydrogeological Conceptual Model were agreed upon by the Delta-Mendota Subbasin Technical Working Group and approved by the Delta-Mendota Coordination Committee over the period extending from December 2017 through April 2019.

1. Four distinct hydrogeologic layers were initially identified for the Hydrogeological Conceptual Model: shallow layer (0-30 ft), medium layer (30 ft – top of Corcoran Clay), Corcoran Clay, and below Corcoran Clay. However, given that some areas in the Subbasin have more complex hydrogeology than others, these layers were consolidated to three regionally-recognized hydrogeologic features with management areas used further define localized hydrogeologic complexities as needed for SGMA compliance. At the Subbasin level, the three regionally-recognized hydrogeologic features are two principle aquifers – an upper aquifer (unconfined to semi-confined above the Corcoran Clay) and a lower aquifer (confined below the Corcoran Clay), and the intervening regional aquitard known as the Corcoran Clay. This hydrogeologic conceptual model was recommended by the Technical Working Group and approved by the Coordination Committee.
2. SGMA requires a description of the definable bottom of the basin (§354.14 of the GSP Emergency Regulations). The agreed-upon definable bottom of the basin for the Delta-Mendota Subbasin is the base of fresh water consistent with the published definition of the Base of Fresh Water found in R. W. Paige (USGS, Hydrologic Investigations Atlas HA-489, 1973), defined as >3,000 micromhos/cm [$\mu\text{mhos/cm}$] at 25°C.
3. For the required water surface elevation mapping for the defined current year (WY2013), data from January to April were used for the seasonal high (spring) mapping, and data from August to October were used for the seasonal low (fall) mapping to provide sufficient spatial distribution of data for mapping (recommended by the Technical Working Group during the period from March 2018 through August 2018).
4. Data collected during the aforementioned period (as noted in #3, above) were used to prepare water surface contour maps for the upper aquifer. No water surface elevation contour maps were prepared for the lower aquifer for 2013 Fall and Spring (as required by the GSP regulations) due to a lack of aquifer-specific data in most areas of the Subbasin. However, lower aquifer data collected during the aforementioned period were plotted on maps in lieu of the required contour maps.

5. The Technical Working Group used WY2011 (wet water year), WY2012 (dry water year), and WY2015 (Shasta critical water year) to compare groundwater elevation mapping prepared by the various GSP Groups for their respective GSP Plan areas.
6. Kenneth D. Schmidt & Associates mapping of interconnected reaches of the San Joaquin River based on the San Joaquin River Restoration Program was used for areas within the SJREC and Grassland GSP Plan areas. For other GSP Plan areas adjacent to the San Joaquin River, determinations of interconnectedness were provided by those preparing individual GSPs. A table will be provided showing which San Joaquin River reaches are within each GSP Plan area and whether those reaches are interconnected. If necessary to implement the sustainability goal of the Subbasin, the GSAs will coordinate estimating volumes of gains and losses at these reaches of the San Joaquin River.

TECHNICAL MEMORANDUM #3

RE: Assumptions for the Historic, Current and Projected Water Budgets of the Delta-Mendota Subbasin, Change in Storage Cross-Check and Sustainable Yield

PREPARED BY: Woodard & Curran

DATE: July 25, 2019

During development of the six coordinated Groundwater Sustainability Plans (GSPs) for the Delta-Mendota Subbasin (Subbasin), the twenty-three Groundwater Sustainability Agencies (GSAs) in the Subbasin agreed upon methodologies and assumptions for water budgets, change in storage, and sustainable yield. The common data and methodologies required in Water Code Section 10727.6 and Title 23, California Code of Regulations, Section 357.4 to prepare coordinated plans and utilized in preparation of the Delta-Mendota Subbasin GSPs are set forth in Technical Memoranda. Each of the individual Memoranda satisfies a requirement agreed upon in the Coordination Agreement and, collectively when combined with the Coordination Agreement, provides an explanation of how the six Subbasin GSPs implemented together satisfy the requirements of the Sustainable Groundwater Management Act (SGMA) for the entire Subbasin.

The Technical Memoranda will be utilized by the Coordination Agreement Parties (representing the twenty-three GSAs in the Subbasin) during the implementation of their GSPs in order to ensure coordination of the GSPs. The Coordination Committee is responsible for ongoing review and updating of the Technical Memoranda, as needed, during GSP implementation.

The following common assumptions were utilized by each GSP Group in the Subbasin in developing the historic and projected water budgets for their respective GSP Plan areas. These GSP-specific water budgets were then compiled (rolled-up) to the Subbasin level for inclusion in the Common Chapter. Also included herein are the assumptions used in developing Subbasin-level sustainable yield estimates for each principal aquifer. These assumptions were recommended by the Delta-Mendota Subbasin Technical Working Group and approved by the Delta-Mendota Coordination Committee.

1. Water Budgets

On September 25, 2017, the Delta-Mendota Subbasin Technical Working Group met with Trevor Joseph (Senior Engineering Geologist) and Mark Nordberg (Senior Engineering Geologist) from the California Department of Water Resources (DWR) to discuss how the development of six GSPs for the Subbasin will be coordinated to implement the best available science while also coordinating to use the same data and methodologies. DWR expressed concerns regarding coordination between those GSPs using a numerical model and those using a non-numerical (spreadsheet) model. Mr. Joseph advised that SGMA requires sustainability for the entire subbasin and was concerned about coordinating a subbasin water budget. The SJREC have experience sustainably managing groundwater using a non-numerical model. A follow-up meeting took place on November 17, 2017 with DWR representatives Trevor Joseph, Tyler Hatch (Senior Engineer) and Amanda Peisch-Derby (Regional SGMA Coordinator) to showcase how this spreadsheet model has been used. It was further discussed that the hydrogeologic principles and equations used for both types of modeling in the Delta-Mendota Subbasin are the same. DWR agreed that coordination amongst the GSP Groups, ensuring use of the same data and methodologies, can be achieved for SGMA modeling purposes in the Subbasin.

Historic Water Budget

The historic period adopted by the Subbasin Coordination Committee was defined as Water Year (WY) 2003 through WY2012. A water year is the period beginning October 1st and ending on September 30th of the subsequent year. The historic water budget period was ratified by the Coordination Committee on January 14, 2019.

Each GSP Group in the Delta-Mendota Subbasin developed land surface water budgets and groundwater budgets for the historic period using the best available public and local data for each respective GSP Plan area. The parameters (specific inputs and outputs) that each GSP Group evaluated were coordinated and summed to develop the Subbasin-wide water budget and to estimate the change in groundwater storage in the upper aquifer in each GSP Plan area. Parameters included pumping/tile drainage, subsurface inflows/outflows, and deep percolation of precipitation and applied surface water. Estimates of changes in groundwater levels in the upper aquifer over the historic water budget period were also utilized to estimate change in groundwater storage. The estimated change in groundwater storage for the upper aquifer from the compiled water budgets was compared to that estimated from changes in groundwater level. For purposes of developing a change in groundwater storage in the upper aquifer over the historic water budget period, the estimates developed from the water budget methodology were used for the Subbasin.

Development of the change in lower aquifer storage value was limited as a result of a lack of available aquifer-specific groundwater level data in most areas of the Subbasin. As a result, a methodology for estimating change in lower aquifer storage from subsidence, along with changes in potentiometric head (where groundwater level data were available), was used. For GSP Plan areas where groundwater level data were not available to support calculations of change in lower aquifer storage, change in land surface elevations was used as a proxy for estimates of change in lower aquifer storage. The best available subsidence data by GSP Group and representative specific yield values (defined as the volume of water released from storage by an unconfined aquifer per unit surface area of aquifer per unit decline of the water table) were used to estimate change in lower aquifer storage from subsidence.

Change in Storage Cross-Check

Groundwater elevation contour maps were developed for the upper aquifer for Spring 2003 and Spring 2013 to assess changes in groundwater storage during the historic and current water budget periods. The contour maps were used to estimate upper aquifer change in storage during the historic and current period by subtracting the Spring 2013 contours from the Spring 2003 contours and multiplying the change in groundwater elevations by GSP Plan area and specific yield of the aquifer. Estimates were made for each GSP Plan area and compared to the overall change in storage estimated in the individual GSP historic and current groundwater budgets. The results of the two methodologies were comparable (within 20%).

Change in land surface elevation is used as a proxy for lower aquifer change in storage using a similar methodology, multiplying the change in land surface elevation between 2003 and 2013 by the area covered by individual GSP Plan areas to estimate the change in lower aquifer storage.

Current Water Budget

The current year for the associated water budget was set as WY2013 by the Delta-Mendota Technical Working Group on August 8, 2018 and confirmed by the Delta-Mendota Coordination Committee on August 13, 2018. The current water budget and associated changes in storage (by principal aquifer) were calculated in the same manner as the historic water budgets. The current water budget period was ratified by the Coordination Committee.

Projected Water Budget

Each GSP Group developed their own GSP-specific projected water budgets using a similar methodology to the historic and current water budgets. GSP-specific water budgets were compiled at the Subbasin level, and the Subbasin projected water budget was recommended and approved at a joint meeting of the Delta-Mendota Technical Working Group and Coordination Committee.

Per SGMA and the GSP regulations, the projected water budget period begins with the year subsequent to the current water budget year and extends for a projection period of at least 50 years to WY2070 for application of the required climate change factors. For the Delta-Mendota Subbasin, the current water budget is WY2013, and the projected water budget period is WY2014 through WY2070.

As future hydrology (e.g. precipitation totals) is not known, historic hydrology is used to simulate projected future hydrology. As a result, each year in the projected water budget is assigned a representative water year from the historic period. For example, WY2018 is assumed to have hydrology similar to that of WY1979; WY2019 is assumed to have hydrology similar to that of WY1980; and so forth. The pattern of historic hydrology used to simulate future hydrology is established based on actual hydrology from WY2014 - WY2017 (known water year types at the start of the projected water budget period). This resulted in the following projected hydrologic pattern.

For the first four years of the projected water budget (WY2014 through WY2017), actual data are used and no climate change factor is applied. For WY2018 through WY2070, the following representative water year sequencing is used:

- WY2018 is equivalent to WY1979.
- Each subsequent projected water year (WY2019 through WY2056) will follow the equivalent subsequent historic water year (e.g. WY2019 is equivalent to WY1980; WY2020 is equivalent to WY1981, and so forth, with WY2056 being equivalent to WY2017).
- WY2057 is equivalent to WY1965 with each subsequent water year (WY2058 through WY2070) equivalent to the subsequent historic water year (with WY2070 being equivalent to WY1978).

Representative water years used the associated historic water year types for assumptions relative to projected hydrology (precipitation, stream flows, and evapotranspiration [ET]). Water year types were based on the San Joaquin River Index except for Shasta Critical Years, which required simulation of the SJREC and wildlife refuge surface water deliveries. Therefore, in summary, the following water year types were assigned to projected water years based on the associated representative water year type: Shasta Critical, Critical, Dry, Below Normal, Above Normal, and Wet, with all designations based on the San Joaquin River Index, except Shasta Critical defined by Shasta index (as recommended by the Technical Working Group). For projected simulations, water year types were 'lumped' into four categories as follows: wet, average (above and below normal), dry (dry and critical) and Shasta critical (as recommended by the Technical Working Group).

As agreed, upon, Climate Change Factors (CCFs) for precipitation and ET were applied considering representative historical year types surrogating for future years through WY2070. For projected years WY2038 through WY2043 (repeated WY2012 through WY2017), DWR did not establish precipitation or ET CCFs. Based on conversations with DWR, the following CCFs for precipitation and ET were used for this intervening period:

- WY 2012 used the 2001 2070 CCF
- WY 2013 used the 1992 2070 CCF
- WY 2014 used the 1976 2070 CCF
- WY 2015 used the 1977 2070 CCF
- WY 2016 used the 2002 2070 CCF
- WY 2017 used the 2011 2070 CCF

For projected years WY2030 - WY2043 (repeated WY2004 - WY2017), DWR did not establish streamflow CCFs. For this reason, DWR suggested to use surrogate years' CCFs for the projected period. The following CCFs were selected for streamflows:

- WY 2004 used the 2002 2030 CCF
- WY 2005 used the 2002 2030 CCF
- WY 2006 used the 1998 2030 CCF
- WY 2007 used the 1992 2070 CCF
- WY 2008 used the 1992 2070 CCF
- WY 2009 used the 2002 2070 CCF
- WY 2010 used the 2003 2070 CCF
- WY 2011 used the 1997 2070 CCF
- WY 2012 used the 1992 2070 CCF
- WY 2013 used the 1992 2070 CCF
- WY 2014 used the 1976 2070 CCF
- WY 2015 used the 1977 2070 CCF
- WY 2016 used the 2002 2070 CCF
- WY 2017 used the 1998 2070 CCF

The projected water budget period and associated representative water years were recommended by the Technical Working Group. Use of DWR's CCFs was also coordinated, and it was agreed that CCFs will only be applied to hydrology.

2. Sustainable Yield

The following methodologies were recommended by the Delta-Mendota Technical Working Group and approved by the Coordination Committee for establishing the required sustainable yield estimate for each principal aquifer:

Upper Aquifer Sustainable Yield

The following formula was agreed upon for the calculation of the sustainable yield of the upper aquifer:

$$\text{Sustainable Yield} = (\text{Pumping} + \text{Change in Storage}) + (\text{Outflow} - \text{Inflow})$$

Data used in the calculation are from the Delta-Mendota Subbasin compiled projected water budget with Climate Change Factors and Projects/Management Actions, as well as Baseline Projected Water Budget with Climate Change Factors. A $\pm 10\%$ factor was applied to the resulting sustainable yield estimate; this factor was estimated based on the percent difference in the WY2003-2012 upper aquifer change in storage calculations between the compiled historic water budget and the estimate of change in storage utilizing change in groundwater level contours cross-check analysis (see above). Data incorporated into the equation are the average annual values from the indicated projected water budgets (WY2014 - WY2070) using only upper aquifer values.

Sustainable management criteria (Minimum Thresholds and Measurable Objectives) will be the primary indicator governing upper aquifer extractions. The sustainable yield estimates will be updated as part of the five-year GSP review.

Lower Aquifer Sustainable Yield

Within the Delta-Mendota Subbasin, the distribution of known lower aquifer water level data and extraction volume data are limited and not sufficient to allow for a calculation of lower aquifer sustainable yield. A Northern & Central Delta-Mendota Region Management Committee memo dated April 10, 2019 outlined the alternative method used to estimate sustainable yield method for the lower aquifer and is summarized below.

The Westlands Water District GSA has completed a recent study using groundwater modeling, in conjunction with the Westside Subbasin GSP development, to estimate sustainable yield for that subbasin. Based on an analysis of their data and reflected an initial assumption of lower aquifer sustainable yield equivalent to approximately 0.35 acre-feet per acre within the Westside Subbasin (Westlands Water District GSA, Groundwater Management Strategy Concepts presentation to the WWD Board on October 16, 2018). Using this analysis, a slightly lower sustainable yield value for the lower aquifer was selected (0.33 acre-feet per acre), amounting to approximately 250,000 acre-feet per year over the approximately 750,000-acre Delta-Mendota Subbasin.

The lower criteria for a lower aquifer sustainable yield estimation compared to that considered by Westlands Water District reflects DWR's classification of the Delta-Mendota Subbasin as critically-overdrafted due to the subsidence issues. After more data are obtained in future years, the lower aquifer sustainable yield value may undergo revisions.

3. Other

The Technical Working Group of the Subbasin Coordination Committee discussed that not-yet implemented plans or programs (e.g. Delta conveyance, Updates to the Bay-Delta Water Quality Control Plan/SED, proposed large storage projects, etc.) would not be incorporated into the current GSPs. However, projects or programs may be qualitatively incorporated or described in individual GSPs, and such programs will be monitored during the next five years and incorporated into the GSPs in future updates as appropriate.

TECHNICAL MEMORANDUM #4

RE: Assumptions for Delta-Mendota Subbasin Management Areas, Sustainability Management Criteria

PREPARED BY: Woodard & Curran

DATE: July 25, 2019

During development of the six coordinated Groundwater Sustainability Plans (GSPs) for the Delta-Mendota Subbasin (Subbasin), the twenty-three Groundwater Sustainability Agencies (GSAs) in the Subbasin agreed upon methodologies and assumptions for water budgets, change in storage, and sustainable yield. The common data and methodologies required in Water Code Section 10727.6 and Title 23, California Code of Regulations, Section 357.4 to prepare coordinated plans and utilized in preparation of the Delta-Mendota Subbasin GSPs are set forth in Technical Memoranda. Each of the individual Memoranda satisfies a requirement agreed upon in the Coordination Agreement and, collectively when combined with the Coordination Agreement, provides an explanation of how the six Subbasin GSPs implemented together satisfy the requirements of the Sustainable Groundwater Management Act (SGMA) for the entire Subbasin.

The Technical Memoranda will be utilized by the Coordination Agreement Parties (representing the twenty-three GSAs in the Subbasin) during the implementation of their GSPs in order to ensure coordination of the GSPs. The Coordination Committee is responsible for ongoing review and updating of the Technical Memoranda, as needed, during GSP implementation.

The following common assumptions were utilized by each GSP Group in the Subbasin for preparing a subbasin-level description of management areas and sustainable management criteria.

1. Management Areas

The Coordination Committee left management areas and management of their respective GSPs to the six GSP Groups. Management areas were determined individually by each GSP Group with Woodard & Curran preparing a map showing all management areas ('sum of the parts' approach).

2. Sustainable Management Criteria

Per the GSP Regulations, definitions of undesirable results must be provided at the Subbasin level. The Technical Working Group defined these as follows:

- Chronic Lowering of Groundwater Levels: Significant and unreasonable chronic change in water levels, as defined by each GSP Group, that has an impact on the beneficial users of groundwater in the Subbasin through either intra- and/or inter-basin actions.
- Long-term Reduction of Groundwater Storage: Significant and unreasonable chronic decrease in groundwater storage, as defined by each GSP Group, that has an impact on the beneficial users of groundwater in the Subbasin through either intra- and/or inter-basin actions.
- Degraded Water Quality: Significant and unreasonable degradation of groundwater quality, as defined by each GSP Group, that has an impact on the beneficial users of groundwater in the Subbasin through either intra- and/or inter-basin actions and/or activities.
- Depletions of Interconnected Surface Water: Depletions of interconnected surface water, as defined by each GSP Group, that have significant and unreasonable adverse impacts on the beneficial uses of surface water

- Land Subsidence: Changes in ground surface elevation that cause damage to critical infrastructure that would cause significant and unreasonable reductions of conveyance capacity, damage to personal property, impacts to natural resources or create conditions that threaten public health and safety.
- Seawater Intrusion: The Coordination Committee recognized that the Subbasin is not in a coastal location and therefore seawater intrusion is unable to occur and therefore a definition of an undesirable result is not necessary.

Each GSP Group individually defined significant and unreasonable for each sustainability indicator, as well as established sustainability goals, interim milestones, minimum thresholds and measurable objectives. This process was discussed during the February 2019 meetings of the Technical Working Group, and ultimately recommended and approved by the Coordination Committee.

TECHNICAL MEMORANDUM #5

RE: Assumptions for Delta-Mendota Subbasin Monitoring Network

PREPARED BY: Woodard & Curran

DATE: July 25, 2019

During development of the six coordinated Groundwater Sustainability Plans (GSPs) for the Delta-Mendota Subbasin (Subbasin), the twenty-three Groundwater Sustainability Agencies (GSAs) in the Subbasin agreed upon methodologies and assumptions for water budgets, change in storage, and sustainable yield. The common data and methodologies required in Water Code Section 10727.6 and Title 23, California Code of Regulations, Section 357.4 to prepare coordinated plans and utilized in preparation of the Delta-Mendota Subbasin GSPs are set forth in Technical Memoranda. Each of the individual Memoranda satisfies a requirement agreed upon in the Coordination Agreement and, collectively when combined with the Coordination Agreement, provides an explanation of how the six Subbasin GSPs implemented together satisfy the requirements of the Sustainable Groundwater Management Act (SGMA) for the entire Subbasin.

The Technical Memoranda will be utilized by the Coordination Agreement Parties (representing the twenty-three GSAs in the Subbasin) during the implementation of their GSPs in order to ensure coordination of the GSPs. The Coordination Committee is responsible for ongoing review and updating of the Technical Memoranda, as needed, during GSP implementation.

The following common assumptions and approaches were utilized in developing the required Subbasin monitoring network for sustainability indicators:

- The required Subbasin-level monitoring networks will be a compilation of networks developed by each individual GSP Group.
- The compilation of the individual GSP monitoring networks will provide sufficient data in order to develop required water surface elevation contouring for each principal aquifer in the Subbasin, if applicable.
- The GSP groups will use CASGEM monitoring network data for 2018 and 2019 data collection and will supplement with locally collected data where available.
- Each monitoring location or point within the GSP network will be monitored, at a minimum, at the agreed upon frequency for each of the data types.
- Field Collection will follow agreed-upon protocols which may be the same as, or equal to, data collection protocols (i.e. industry standards and best management practices).
- For non-monitored data to be reported as part of the annual reports (e.g. groundwater extractions, surface water deliveries), actual metered data will be used where such data exists, and when direct data do not exist, estimated quantities will be calculated based on existing indirect data (e.g. electrical usage, crop demand, ET) and/or other industry best practices.
- Seasonal high groundwater elevation data will be collected between February and April, and seasonal low groundwater elevation data will be collected between September and October.
- Each GSP Group may use supplemental data in addition to the SGMA-required monitoring network documented in their GSP in order to comply with these requirements and those set forth in the Coordination Agreement.

- Individual data gaps in the monitoring networks and monitoring data identified in the GSPs will progressively be addressed by the applicable GSA or GSP Group during the 20-year GSP implementation timeframe (2020 to 2040).

TECHNICAL MEMORANDUM #6

RE: Coordination of the Delta-Mendota Subbasin Data Management System

PREPARED BY: Woodard & Curran

DATE: July 25, 2019

During development of the six coordinated Groundwater Sustainability Plans (GSPs) for the Delta-Mendota Subbasin (Subbasin), the twenty-three Groundwater Sustainability Agencies (GSAs) in the Subbasin agreed upon methodologies and assumptions for water budgets, change in storage, and sustainable yield. The common data and methodologies required in Water Code Section 10727.6 and Title 23, California Code of Regulations, Section 357.4 to prepare coordinated plans and utilized in preparation of the Delta-Mendota Subbasin GSPs are set forth in Technical Memoranda. Each of the individual Memoranda satisfies a requirement agreed upon in the Coordination Agreement and, collectively when combined with the Coordination Agreement, provides an explanation of how the six Subbasin GSPs implemented together satisfy the requirements of the Sustainable Groundwater Management Act (SGMA) for the entire Subbasin.

The Technical Memoranda will be utilized by the Coordination Agreement Parties (representing the twenty-three GSAs in the Subbasin) during the implementation of their GSPs in order to ensure coordination of the GSPs. The Coordination Committee is responsible for ongoing review and updating of the Technical Memoranda, as needed, during GSP implementation. This Technical Memorandum describes the development and anticipated use of the coordinated Subbasin Data Management System (DMS) for GSP implementation.

Coordinated Data Management System

As required in Section 352.6, Data Management System, of the GSP regulations, the Delta-Mendota Subbasin GSAs will develop and maintain a data management system that is capable of storing and reporting information relevant to the reporting requirements, implementation of the GSPs, and the monitoring networks of the Subbasin. Additionally, per Section 354.4, Reporting Monitoring Data to the California Department of Water Resources (DWR), all monitoring data are to be stored in a DMS with copies of the monitoring data included in the annual report and submitted electronically on forms provided by DWR. Recognizing that GSP implementation, including annual reporting, will require some efforts at the subbasin level, the 23 GSAs overlying the Delta-Mendota Subbasin have chosen to develop a coordinated DMS that can be utilized by each GSP Group for management of their data but which will allow for the required compilation of data sets for preparation of Subbasin annual reports. The coordinated DMS, once developed, will provide a generic framework that can be used by any GSP Group or GSA in the Subbasin for individual data management while allowing for consistent formatting and the simplified uploading of compiled datasets into the Subbasin-wide coordinated DMS.

The Parties have also developed and will maintain separate data storage processes or Data Management Systems. Each separate DMS developed for each GSP will store information related to implementation of each individual GSP, monitoring network data and monitoring sites requirements, and water budget data requirements. Each system will be capable of reporting all pertinent information to the respective GSA and/or GSP Group, and ultimately to the Coordination Committee. After providing the Coordination Committee with data from the individual GSPs, the Subbasin Plan Manager and Coordination Committee will ensure the data are stored and managed in a coordinated manner throughout the Subbasin and reported to DWR on an annual basis.

Leading up to the development of the DMS, the Subbasin used an *ad hoc* DMS working group and survey to develop a conceptual design for the software requirements. This was followed by the software vendor creating wireframes to communicate the functionality of the DMS. This *ad hoc* working group developed data standards for each data type to make the aggregation feasible at a subbasin level and established weekly calls to develop import wizards, attribute

tables, interpretations of reporting requirements, and an annual report format. Data provided by Santa Nella County Water District were used to beta-test the completed DMS prior to release as a generic system for Subbasin-wide use.

The DMS includes permissions and business rules so each GSP can only upload data for their GSP based upon usernames and roles. GSP Groups, or GSAs within a GSP Group, are also not allowed to see other GSP Groups' data until all annual reporting has been completed and accepted by the Plan Manager. DMS development is ongoing, with development concurrent with final GSP development, and has been designed to support the needs of the severely disadvantaged communities, disadvantaged communities, and GSAs within the Subbasin. The DMS is scheduled to be completed for use in developing annual reports by January 2020.

The DMS constructed for the Delta-Mendota Subbasin is a secured web-based application hosted on Amazon Web Services (AWS). The DMS focuses on five core business requirements including: centralized data warehouse, security of data, permissioned based access, data visualization and reporting. Other goals of the DMS focus around improving data collection/aggregation processes, creating data standards, gaining efficiencies in reporting and improving data sharing with stakeholders. The DMS is designed to aggregate data through import processes by GSP to support data visualization and annual report generation.

Underlying the web application is a relationship database used to store the information aggregated from GSPs across primary data types identified to support monitoring and Annual Report development. Those data types include groundwater extractions, surface water deliveries, groundwater storage, groundwater elevations, groundwater quality, interconnected surface water and land subsidence. The web application functionality includes an embedded GIS viewer, screens to view tables of time series data, and charting capabilities for hydrographs. The embedded GIS viewer contains functionality to store map layers such as reference data, GSA/GSP boundaries and derived information such as water level contours.

In order to facilitate data synthesis, the GSP Groups agreed on the following frequencies for monitoring data collection:

- Groundwater elevations – twice a year (seasonal high and seasonal low)
- Interconnected surface water – twice a year (seasonal high and seasonal low)
- Groundwater quality – once a year
- Land subsidence – continuous monitoring sites or by Management Area

These datasets will be augmented with other data collection required for annual report preparation, including estimates of groundwater extractions and surface water diversions.

Additionally, the GSP Groups agreed to utilize the same general monitoring protocols or similar industry standards to ensure that the data were collected in a consistent and coordinated fashion. All monitoring locations in the Delta-Mendota Subbasin were assigned a unique identifier in the DMS. The number system is in a format of ##-####, where the first two digits indicates which GSA the monitoring location is associated with, and the subsequent four digits indicate the specific monitoring location in that GSA area. The general methodology agreed upon for data import and management is as follows:

- Each GSA collects their respective data per agreed-upon protocols and transmits it to the GSA representative.
- Each GSA representative then compiles the data and conducts a quality control check.
- The GSA representative transmits the compiled data set to the GSP Lead or Representative, who then aggregates the data from all GSAs and conducts a second quality control check.
- The GSP Lead or Representative uploads the data set into the DMS using import wizards designed specifically for this process.

- The Subbasin Plan Manager then uses the data in the DMS to compile information as required for the annual report.

Compiled data sets from the DMS will be augmented with required maps generated externally to produce the required annual report. Mapping prepared outside the DMS will be subsequently imported into the DMS as GIS files to ensure all data are kept in one place.

The DMS will be maintained by the San Luis & Delta-Mendota Water Authority, while acting as the Plan Manager, with a contract with the software vendor for hosting, maintenance and future updates. Each GSP will pay a maintenance fee for the continued hosting and support of the Subbasin coordinated DMS.

The Subbasin-level DMS, as described herein, may be supplemented by additional DMSs developed and maintained by each GSP Group or GSA in the Subbasin. The reader is referred to each of the six Subbasin GSPs for specific information relative to data collection and management in each GSP Plan area.

TECHNICAL MEMORANDUM #7

RE: Adoption and Use of the Subbasin Coordination Agreement

PREPARED BY: Woodard & Curran

DATE: July 25, 2019

During development of the six coordinated Groundwater Sustainability Plans (GSPs) for the Delta-Mendota Subbasin (Subbasin), the twenty-three Groundwater Sustainability Agencies (GSAs) in the Subbasin agreed upon methodologies and assumptions for water budgets, change in storage, and sustainable yield. The common data and methodologies required in Water Code Section 10727.6 and Title 23, California Code of Regulations, Section 357.4 to prepare coordinated plans and utilized in preparation of the Delta-Mendota Subbasin GSPs are set forth in Technical Memoranda. Each of the individual Memoranda satisfies a requirement agreed upon in the Coordination Agreement and, collectively when combined with the Coordination Agreement, provides an explanation of how the six Subbasin GSPs implemented together satisfy the requirements of the Sustainable Groundwater Management Act (SGMA) for the entire Subbasin.

This Technical Memorandum describes the Delta-Mendota Subbasin governance structure, participating parties, the Delta-Mendota Subbasin Coordination Agreement (Coordination Agreement), and details of this Coordination Agreement. Each GSA in the Subbasin is included in this memorandum. Additional details of the organization, management structure, and legal authority of each GSA and their associated GSPs, and accompanying GSA boundary maps, are described in the Delta-Mendota Subbasin Common Chapter (Common Chapter). Descriptions of intrabasin and interbasin coordination agreements in place for the development and implementation of the GSPs overlying the Subbasin are also referenced.

1. GSP and Coordination Agreement Submission

A Delta-Mendota Subbasin Common Chapter has been developed to “knit” the six Delta-Mendota GSPs together for cohesive implementation. The Common Chapter includes a separate signature page that contains a disclosure statement and professional stamp for the consultant charged with compiling the chapter (Woodard & Curran), as agreed upon by the Technical Working Group on April 17, 2018 and January 15, 2019. Each Subbasin GSP is stamped and signed by the professional overseeing their preparation. The Common Chapter was developed as part of a collaborative process, with input from the various GSAs, technical consultants, and stakeholders. The Coordination Agreement, Common Chapter, and Technical Memoranda collectively serve as the mechanism through which the GSAs and individual GSPs are coordinated during implementation.

The GSAs have agreed to submit their respective GSPs to the California Department of Water Resources (DWR) through the Delta-Mendota Subbasin Coordination Committee (Coordination Committee) and the Plan Manager, along with all developed Common Chapter and Technical Memoranda, by January 31, 2020. When submitted to DWR, the collective documents will be available for public review and comment as part of the 60-day public comment period per SGMA regulations.

2. GSP Groups and GSAs in the Delta-Mendota Subbasin

Below is a summary of the six GSP Groups and twenty-three GSAs (and their respective signatories) to the Coordination Agreement. Some signatories (also referred to as parties) are participating in multiple GSAs and/or GSPs.

Northern & Central Delta-Mendota Region GSP

- Patterson Irrigation District GSA
 - Patterson Irrigation District, Twin Oaks Irrigation District
- West Stanislaus Irrigation District GSA
 - West Stanislaus Irrigation District
- DM-II GSA
 - Del Puerto Water District, Oak Flat Water District
- City of Patterson GSA
 - City of Patterson
- Northwestern Delta-Mendota GSA
 - Merced County, Stanislaus County
- Central Delta-Mendota GSA
 - San Luis Water District, Santa Nella County Water District, Panoche Water District, Mercy Springs Water District, Tranquillity Irrigation District, Merced County, Fresno Slough Water District, Fresno County, Eagle Field Water District, Pacheco Water District
- Widren Water District GSA
 - Widren Water District
- Oro Loma Water District GSA
 - Oro Loma Water District

San Joaquin River Exchange Contractors (SJREC) GSP

- San Joaquin River Exchange Contractors Water Authority GSA
 - Central California Irrigation District, Columbia Canal Company, Firebaugh Canal Water District, San Luis Canal Company
- Turner Island Water District-2 GSA
 - Turner Island Water District
- City of Mendota GSA
 - City of Mendota
- City of Firebaugh GSA
 - City of Firebaugh
- City of Los Banos GSA
 - City of Los Banos
- City of Dos Palos GSA
 - City of Dos Palos
- City of Gustine GSA
 - City of Gustine
- City of Newman GSA
 - City of Newman
- Madera County GSA
 - Madera County
- Portion of Fresno County Management Area B GSA
 - Fresno County
- Portion of Merced County – Delta-Mendota GSA
 - Merced County

Grassland GSP

- Grassland GSA
 - Grassland Water District, Grassland Resource Conservation District
- Portion of Merced County GSA
 - Merced County

Farmers Water District GSP

- Farmers Water District GSA
 - Farmers Water District

Fresno County GSP

- Fresno County Management Area A GSA
 - Fresno County
- Fresno County Management Area B GSA
 - Fresno County

Aliso Water District GSP

- Aliso Water District GSA
 - Aliso Water District

With respect to the San Benito County portion of the Delta-Mendota Subbasin, this area will be included in the Central Delta-Mendota GSA of the Northern & Central Delta-Mendota Region GSP. In 2017, the San Benito County Water District Groundwater Sustainability Agency indicated its intent to act as the GSA for certain areas within its jurisdiction, but not for the unmanaged *de minimis* area in the most southwest portion of the Delta-Mendota Subbasin. For purposes of assuring that all land within the Subbasin is part of a GSP as required by DWR regulations, the Central Delta-Mendota GSA entered into a Memorandum of Understanding with San Benito County to include the unmanaged *de minimis* area in the Northern & Central Delta-Mendota Region GSP.

3. Delta-Mendota Subbasin Intrabasin Coordination Agreement

The aforementioned GSAs are coordinating development and implementation of the six GSPs under the Delta-Mendota Subbasin Coordination Agreement. All GSAs within the Subbasin agree to work collaboratively to meet the objectives of SGMA and the Coordination Agreement. Each GSA acknowledges that it is bound by the terms of this Coordination Agreement.

The Coordination Agreement for the Delta-Mendota Subbasin covers the following topics:

1. Purpose of the Agreement, including:
 - a. Compliance with SGMA and
 - b. Description of Criteria and Function;
2. Definitions
3. General Guidelines, including:
 - a. Responsibilities of the Parties and
 - b. Adjudicated or Alternative Plans in the Subbasin;
4. Role of San Luis & Delta-Mendota Water Authority (SLDMWA), including:
 - a. Agreement to Serve,
 - b. Reimbursement of SLDMWA, and
 - c. Termination of SLDMWA's Services;

5. Responsibilities for Key Functions, including:
 - a. Coordination Committee,
 - b. Coordination Committee Officers,
 - c. Coordination Committee Authorized Action and Limitations,
 - d. Subcommittees and Workgroups,
 - e. Coordination Committee Meetings, and
 - f. Voting by Coordination Committee;
6. Approval by Individual Parties;
7. Exchange of Data and Information, including:
 - a. Exchange of Information and
 - b. Procedure for Exchange of Information;
8. Methodologies and Assumptions, including:
 - a. SGMA Coordination Agreements,
 - b. Pre-GSP Coordination, and
 - c. Technical Memoranda Required;
9. Monitoring Network
10. Coordinated Water Budget
11. Coordinated Data Management System
12. Adoption and Use of the Coordination Agreement, including:
 - a. Coordination of GSPs and
 - b. GSP and Coordination Agreement Submission;
13. Modification and Termination of the Coordination Agreement, including:
 - a. Modification or Amendment of Exhibit "A" (Groundwater Sustainability Plan Groups including Participation Percentages),
 - b. Modification or Amendment of Coordination Agreement, and
 - c. Amendment for Compliance with Law;
14. Withdrawal, Term, and Termination;
15. Procedures for Resolving Conflicts;
16. General Provisions, including:
 - a. Authority of Signers,
 - b. Governing Law,
 - c. Severability,
 - d. Counterparts, and
 - e. Good Faith; and
17. Signatories of all Parties

The Coordination Agreement, effective as of December 12, 2018, has been signed by all thirty-six parties in the Delta-Mendota Subbasin. These signatories to the Coordination Agreement have formed a total of 23 GSAs in the Subbasin. A key goal of basin-wide coordination is to ensure that the Subbasin GSPs utilize the same data and methodologies during their plan development and that the elements of the Plans necessary to achieve the sustainability goal for the Subbasin are based upon consistent interpretations of the basin setting, as required by SGMA and associated regulations. It is the intent that the Coordination Agreement become part of each individual GSP within the Delta-Mendota Subbasin.

Delta-Mendota Subbasin Coordination Committee

The Delta-Mendota Subbasin Coordination Agreement establishes the Delta-Mendota Subbasin Coordination Committee (Coordination Committee), which provides representation from each of the six GSP groups. The Coordination Committee complies with requirements of the Brown Act. The Coordination Agreement describes the Coordination Committee's requirements for meeting noticing, attendance, voting, data sharing, governance of subcommittees and working groups, and approval of Subbasin documents.

The Coordination Agreement allows for development of individual subcommittees or working groups to support the development of the Technical Memorandums and to coordinated data, methodologies, and assumptions. For this purpose, the Coordination Committee recommended formation of an ad hoc Technical Working Group, Communications Working Group, and Data Management System Working Group.

The Coordination Committee provides specific direction to the Plan Manager. The initial Plan Manager for the six coordinated GSPs is Andrew Garcia, Senior Civil Engineer for San Luis & Delta-Mendota Water Authority (SLDMWA); however, the Coordination Committee and Coordination Agreement allow for a consultant of the SLDMWA to act as Plan Manager, if necessary. If the SLDMWA ceases to serve as Plan Manager, the Coordination Committee can name a successor per the Coordination Agreement. In the meantime, Mr. Garcia's contact information is included below:

Mr. Andrew Garcia, Plan Manager
 San Luis & Delta-Mendota Water Authority
 842 6th Street
 Los Banos, CA 93635
 Phone: (209)-832-6200 / Fax (209)-833-1034
andrew.garcia@sldmwa.org

Contact information for each GSP plan administrator is included in the respective GSPs.

Technical Memoranda

The Coordination Agreement describes the development of Technical Memoranda. These memoranda collectively explain the data, methodologies, and assumptions approved and used by the six GSP Groups within the Subbasin. The Coordination Agreement specifically referenced four Technical Memoranda; the Technical Working Group of the Coordination Committee subsequently recommended development of additional Technical Memoranda during the GSP development efforts. The Technical Memoranda are subject to the Coordination Committee's review and unanimous approval and will be submitted along with the Coordination Agreement to DWR. The Technical Memoranda will be used throughout GSP implementation to ensure continued coordination and compliance with SGMA.

The Technical Memoranda include:

1. Common Datasets Used in the Delta-Mendota Subbasin GSPs
2. Assumptions for Hydrogeological Conceptual Model of the Delta-Mendota Subbasin
3. Assumptions for the Historic, Current and Projected Water Budgets of the Delta-Mendota Subbasin, Change in Storage Cross-Check and Sustainable Yield
4. Assumptions for Delta-Mendota Subbasin Management Areas, Sustainability Management Criteria
5. Assumptions for Delta-Mendota Subbasin Monitoring Network
6. Coordination of the Delta-Mendota Subbasin Data Management System
7. Adoption and Use of the Subbasin Coordination Agreement
8. Coordinated Noticing, Communication, and Outreach Activities in the Delta-Mendota Subbasin

Interbasin Coordination

The Delta-Mendota Subbasin adjoins nine neighboring subbasins. These subbasins range in basin condition as determined by DWR, so some subbasins are also on the January 31, 2020 GSP submission deadline, while others have a 2022 deadline. With this multitude of neighbors and variety of timelines, the Delta-Mendota Subbasin has initiated interbasin coordination efforts with all of the adjoining subbasins. The SLDMWA, on behalf of the Northern and Central Delta-Mendota Regions, executed an interbasin data sharing agreement with Westlands Water District, the coordinating agency for the Westside Subbasin. The agreement establishes common assumptions for groundwater conditions as well as a process for continued data sharing for data located within five miles of the boundary between Westside Subbasin and the Delta-Mendota Subbasin.

Additional interbasin coordination efforts have been initiated with other adjoining subbasins. No other agreements have been formalized at the time of the Delta-Mendota Subbasin's GSP submissions, but may be developed later. The Delta-Mendota Subbasin intends to coordinate with neighboring subbasins to develop shared understandings of data and technical approaches.

TECHNICAL MEMORANDUM #8

RE: Coordinated Noticing, Communication, and Outreach Activities in the Delta-Mendota Subbasin

PREPARED BY: Stantec

DATE: July 25, 2019

1. Introduction

The Sustainable Groundwater Management Act of 2014 (SGMA) and subsequent Emergency Regulations developed by the California Department of Water Resources (DWR) in May 2016 identified a number of requirements for public notice and communication related to Groundwater Sustainability Agency (GSA) formation and Groundwater Sustainability Plan (GSP) development. California Code of Regulations §354.10 identifies the requirements for notice and communication information in a GSP:

“Each Plan shall include a summary of information relating to notification and communication by the Agency with other agencies and interested parties including the following:

- (a) A description of the beneficial uses and users of groundwater in the basin, including the land uses and property interests potentially affected by the use of groundwater in the basin, the types of parties representing those interests, and the nature of consultation with those parties.
- (b) A list of public meetings at which the Plan was discussed or considered by the Agency.
- (c) Comments regarding the Plan received by the Agency and a summary of any responses by the Agency.
- (d) A communication section of the Plan that includes the following:
 - (1) An explanation of the Agency’s decision-making process.
 - (2) Identification of opportunities for public engagement and a discussion of how public input and response will be used.
 - (3) A description of how the Agency encourages the active involvement of diverse social, cultural and economic elements of the population within the basin.
 - (4) The method the Agency shall follow to inform the public about progress implementing the Plan, including the status of projects and actions.”

Pursuant to these requirements, GSAs in the Delta-Mendota Subbasin (Subbasin) conducted a number of activities to engage beneficial users of groundwater, interested parties, and the general public in the development of the six Subbasin GSPs. Each GSA was responsible for conducting outreach and engagement related to SGMA within its service area; however, recognizing efficiencies in pooling resources and the importance of consistent messaging, the GSAs also conducted a series of coordinated activities aimed at engaging stakeholders across the Subbasin. This document describes the coordinated tools, methods, and activities the GSAs used to inform and engage stakeholders in development of the Subbasin GSPs.

2. Situation Assessment and Communications Plan

To assist in GSA formation and GSP development, agencies in the Subbasin sought and received Facilitation Support Services funding from DWR in August 2016. Under this funding, a neutral, third-party facilitation team conducted a situation assessment on behalf of the Subbasin GSAs. The purpose of the assessment was to

understand how stakeholders perceived the status of the Subbasin's groundwater resources and identify potential barriers to the successful development of the GSPs.

The facilitation team, with input from local agencies, identified 30 stakeholders representing diverse interests and beneficial users in the Subbasin, together with disadvantaged communities, agricultural well owners, government and land use agencies, and environmental and ecosystem interests. From February 2017 to May 2017, the facilitators conducted over 30 phone and in-person interviews with stakeholders. The facilitators recorded the interview responses and summarized the results in a presentation made to the GSA representatives.

The assessment results were used to inform the development of the Delta-Mendota Subbasin Sustainable Groundwater Management Act Communications Plan (Communications Plan), which is provided with this document as **Attachment A**. The Communications Plan identifies near- and long-term outreach and engagement strategies, tactics, and tools for stakeholder engagement in GSP development and implementation. The Subbasin GSAs used the Communications Plan as a framework for conducting the stakeholder outreach and engagement activities described in this document.

3. Public Noticing and Information

Legal Requirements:

§354.10 (d): A communication section of the Plan that includes the following:
 (3) A description of how the Agency encourages the active involvement of diverse social, cultural, and economic elements of population within the basin.

The Subbasin GSAs developed and used several tools to inform members of the public about GSP development activities and promote opportunities for public engagement. These tools are described below.

- **Website:** The Subbasin website – www.deltamendota.org – is the primary location for information related to SGMA implementation in the Subbasin. Information provided on the website includes: an overview of SGMA, a description of each of the GSP groups, contact information for each of the GSAs, and upcoming workshops and public meetings. The website also serves as a repository for outreach collateral, workshop materials, and meeting packets and minutes for the Delta-Mendota Subbasin Coordination Committee, Technical Working Group, and Communications Working Group (described below).
- **Delta-Mendota Subbasin Newsletter:** The Delta-Mendota Subbasin Newsletter is distributed on a monthly basis and serves as an informational tool to keep interested parties, beneficial users, and members of the general public informed about the development and status of the GSPs. Newsletter topics include Subbasin-wide activities, general announcements, upcoming meetings and workshops, and past and upcoming GSP development activities. Copies of the newsletters are archived on the Subbasin website.
- **Informational Materials:** GSAs in the Subbasin developed a suite of materials in English and Spanish to educate and inform members of the public about SGMA and topics covered in the GSP. These materials include bilingual presentations, fact sheets, handouts, frequently asked questions, and videos. Copies of the materials are available on the Subbasin website. GSA representatives distributed these materials during meetings, workshops, and other outreach activities.

4. Public Engagement in GSP Development

Legal Requirements:

§354.10(b): A list of public meetings at which the Plan was discussed or considered by the Agency;

§354.10 (d): A communication section of the Plan that includes the following:

(2) Identification of opportunities for public engagement and a discussion of how public input and response will be used.

(3) A description of how the Agency encourages the active involvement of diverse social, cultural, and economic elements of population within the basin.

This section describes outreach activities coordinated among the Subbasin GSAs to inform, engage, and consult stakeholders in GSP development. Coordinated outreach activities fell into two main categories: general public outreach and targeted outreach. General public outreach activities primarily consisted of committee and working group meetings, and coordinated workshops aimed at informing and receiving public input on the content of the GSPs. The GSAs also conducted outreach activities targeted at hard-to-reach communities and beneficial users, including agricultural interests, school districts, and disadvantaged communities.

General Public Engagement Activities

There were two primary opportunities for members of the public to engage in development of the Subbasin GSPs: Coordination Committee and working group meetings and coordinated public workshops. These activities are further described below. In addition, the GSAs also informed and engaged members of the public by posting information on the Subbasin and member-agency websites, distributing the monthly newsletter, disseminating bilingual informational materials, and tabling at public events.

Committee Meetings

Comprised of members representing the entities preparing the Subbasin GSPs, the Coordination Committee was formed to provide overall guidance and resolve conflicts among the GSAs to ensure that the GSPs were coordinated as required by SGMA. The Technical Working Group and Communications Working Group were formed under the Coordination Committee to specifically coordinate technical and communication activities, respectively. Public meetings of the Coordination Committee and working groups served as key opportunities for stakeholders to engage and consult in development of the GSPs. Public comments were recorded in the meeting minutes, posted on the Subbasin website, and considered during development of the GSPs.

Coordinated Public Workshops

The Subbasin GSAs planned and held a series of public workshops from May 2018 – May 2019 aimed at educating and soliciting input from the public about topics covered in the GSPs. Table 1 identifies the workshop dates, locations, and topics. At these workshops, GSA representatives and their technical consultants presented information on each GSP development phase. Presentations were followed by an open house period to allow participants to talk directly with their GSA representatives. Bilingual interpreters were present at all workshops to provide interpretation services. All workshop materials, in both English and Spanish, are available on the Subbasin website.

Questions, comments, and input from workshop participants were recorded by facilitation staff and summarized the workshop summaries, provided with this document as **Attachment B**. All public comments were taken in consideration by GSAs and technical consultants during development of the GSPs.

The GSAs used a variety of methods to promote the workshops. These methods included distribution of bilingual flyers and utility bill inserts, email notifications, social media posts, website posts, newspaper notices, and press releases. **Attachment C** includes example workshop promotion activities. GSA representatives also directly contacted local organizations throughout the Subbasin. A list of organizations contacted is provided with this document as **Attachment D**.

Table 1. Coordinated Public Workshops

Date	Location, Venue	Topic
Spring 2018 Workshop		
May 14, 2018	Los Baños, San Luis & Delta-Mendota Water Authority	<ul style="list-style-type: none"> Sustainable Groundwater Management Act overview Delta-Mendota Subbasin overview Opportunities for engagement
May 16, 2018	Patterson, Hammon Senior Center	
May 17, 2018	Mendota, Mendota Library	
Fall 2018 Workshops		
October 22, 2018	Firebaugh, Firebaugh Middle School	<ul style="list-style-type: none"> GSP development and implementation process Data collection Hydrogeologic Conceptual Model Numerical & Analytical Models Water budgets
October 24, 2018	Los Baños, College Greens Building	
October 25, 2018	Patterson, Patterson Senior Center	
Winter 2019 Workshops		
February 19, 2019	Los Baños, College Greens Building	<ul style="list-style-type: none"> Historic and current water budgets Sustainability criteria Undesirable results Projects and management actions
February 20, 2019	Patterson, Patterson City Hall	
March 4, 2019	Santa Nella, Romero Elementary School	
Spring 2019 Workshops		
May 20, 2019	Patterson, Patterson City Hall	<ul style="list-style-type: none"> Projected water budgets Sustainable yield Groundwater monitoring networks Projects and management actions
May 21, 2019	Los Baños, College Greens Building	
May 22, 2019	Santa Nella, Romero Elementary School	
May 23, 2019	Mendota, Mendota Library	

Targeted Stakeholder Engagement

The Subbasin GSAs also conducted targeted outreach and engagement to hard-to-reach communities, interested parties, and stakeholders that were previously underrepresented in other engagement activities. This included outreach to the following stakeholder types:

- Agricultural Interests:** Agricultural stakeholders in the Subbasin include agricultural well operators, growers, ranchers, farmworkers, and agricultural landowners. Strong agricultural representation exists within the leadership of the GSAs. To augment direct outreach being conducted by individuals GSAs, Subbasin representatives also coordinated closely with local county farm bureaus to disseminate information related to GSP development and public workshops.
- School Districts:** Schools districts are considered for both beneficial users of groundwater (for drinking water), as well communication channels to disseminate information about SGMA and GSP development. GSA representatives directly contacted local school districts to notify them of the public workshops. Some schools also help distributed informational materials and workshop flyers to their students and parents.

- *Disadvantaged Communities:* The GSAs followed best practices identified in Collaborating for Success: Stakeholder Engagement for Sustainable Groundwater Management Act Implementation (Community Water Center, 2015) and other guidance documents to engage disadvantaged and severely disadvantaged communities. This included holding meetings in disadvantaged communities; holding meetings in the evening at known local venues, such as schools, civic centers, and community centers; translating fact sheets, meeting materials, and presentations into other languages; and providing interpreting services at all public workshops.

5. GSP Implementation

Legal Requirements:

§ 354.10(b)(4): The method the Agency shall follow to inform the public about progress implementing the Plan, including the status of projects and actions.

Each GSA will utilize its own methods to inform the public about progress implementing its GSP and the status of any projects and management actions. The Subbasin website will continue to be the main source of information for Subbasin-wide announcements, public meetings, workshops, and informational materials. In addition, the GSAs will continue to coordinate public outreach and stakeholder engagement activities related to GSP implementation as-needed.

Attachments: Attachment A - Delta-Mendota Subbasin Sustainable Groundwater Management Act Communications Plan Attachment B – Coordinated Public Workshop Summaries
Attachment C – Example Public Workshop Promotion Materials
Attachment D – Stakeholder and Community Organizations Contacted Regarding Coordinated SGMA Workshops

**ATTACHMENT A. DELTA-MENDOTA SUBBASIN SUSTAINABLE GROUNDWATER
MANAGEMENT ACT COMMUNICATIONS PLAN**



Delta Mendota Subbasin Groundwater Management Sustainable Groundwater Management Act Communications Plan

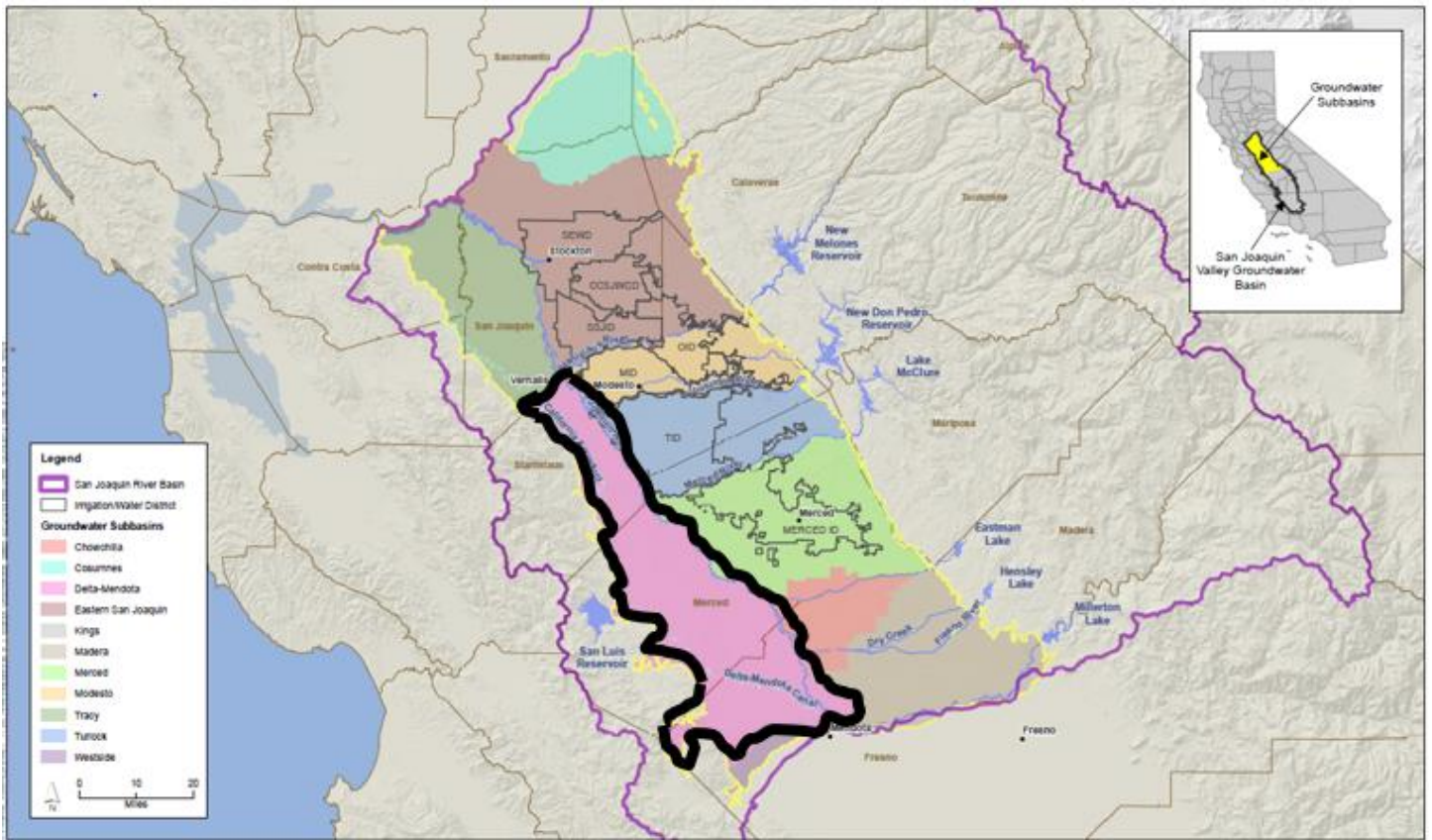


Figure 9-1
Vicinity Map of Groundwater Subbasins



Prepared by:
Lisa Beutler, MWH/Stantec,
Via CA Dept. of Water Resources,
Facilitation Services Technical Assistance

June 2017



Forward: How to use this Plan

This Communication Plan provides a high-level overview of near and long-term outreach and engagement strategies, tactics and tools. Its purpose is to assist the Groundwater Sustainability Agencies (GSAs) of the Delta Mendota Subbasin with stakeholder outreach and other related actions as required by the Sustainable Groundwater Management Act (SGMA) of 2014. It is presented as a working public draft, and should be considered a living document that is continuously refined and updated as circumstances suggest.

Chapter 1: *Introduction and Background* provides text and information about SGMA and the Delta Mendota Subbasin that can be repurposed directly into websites or printed materials by agencies and/or entities with an interest in SGMA and how it will affect the subbasin. This section also describes the communications activities mandated by SGMA.

Chapter 2: *Communications Plan Overview* provides communications planning goals and objectives as well as the scope. This section can be used in support of project management activities.

Chapter 3: *Situation Assessment* provides some of the context for communications activities. This section can be used in developing required assessments of stakeholder issues and interests. It also informs project management activities.

Chapter 4: *Audiences and Messages* identifies key subbasin audiences and message points for specific audience segments. The goal of this chapter is to provide information that can be used by the subbasin GSAs in preparing to work with key stakeholders.

Chapter 5: *Risk Management* is the summary of a communications risk assessment that considers subbasin communications strengths and weakness and proposes on-going adjustments based on best communication management practices. This section informs project management activities and provides a context for some of the recommended communications tactics.

Chapter 6: *Tactical Approaches* offers a communications to do list with specific communications activities relevant for project phases and subbasin audiences.

Chapter 7: *Measurements and Evaluation* outlines methods to determine the effectiveness of outreach and engagement.

Chapter 8: *Roles and Responsibilities* provides a sample list of tasks and illustrates the types of communications roles and responsibilities which might be assigned. This section should be incorporated into project management plans.

Subbasin GSAs should feel free to repurpose any or all parts of the document that will assist them in meeting SGMA requirements.

<p>This document was developed with technical support provided by the California Department of Water Resources' (DWR) SGMA Facilitation Support Services Program and completed by the Communication and Engagement Group of MWH/Stantec.</p>
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**Delta Mendota Subbasin
Sustainable Groundwater Management Act
Communications Plan
Working Draft**

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List of Acronyms and Abbreviations

Item	Description
Basin	Groundwater Basin or Subbasin
Coms Plan	Delta Mendota Subbasin, Sustainable Groundwater Management Act, Working Draft Communications Plan
CSD	Community Service District(s):
CV-SALTS	Central Valley Salinity Alternatives for Long-Term Sustainability
DAC	Disadvantaged Communities
DMC	Delta-Mendota Canal
DWR	California Department of Water Resources
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
IRWMP	Integrated Resource Water Management Plan
PDF	Portable Document Format
RCD	Resource Conservation District(s)
SGMA	Sustainable Groundwater Management Act
SLDMWA	San Luis Delta- Mendota Water Authority
State Board	State Water Resources Control Board

Item	Description
SA	Situation Assessment
USGS	United States Geological Survey

Revision History

Table 1. Revision History

Revision History			
Revision/Dock Title #	Date of Release	Author	Summary of Changes

INTRODUCTION AND BACKGROUND

The purpose of this Communication Plan is to assist the Groundwater Sustainability Agencies (GSAs) of the Delta Mendota Subbasin with stakeholder outreach and other related actions as required by the Sustainable Groundwater Management Act (SGMA) of 2014. Its chapters identify key stakeholders and provide a high-level overview of near and long-term outreach and engagement strategies, tactics and tools. The plan was developed with technical support provided by the California Department of Water Resources' (DWR) SGMA Facilitation Support Services Program.

1.1. SGMA Basics¹

After decades of debate, in 2014 California lawmakers adopted SGMA. This far-reaching law seeks to bring the State's critically important groundwater basins into a sustainable regime of pumping and recharge. The change in water management laws has created new obligations for residents and water managers in the Delta-Mendota Groundwater Subbasin. The San Luis Delta- Mendota Water Authority (SLDMWA) is assisting its members in implementation of this law.



SGMA requires, **by June 30, 2017**, the formation of locally-controlled GSAs in many of the State's groundwater basins and subbasins (basins). A GSA is responsible for developing and implementing a **groundwater sustainability plan (GSP)**. These plans assist the basins in meeting sustainability goals. The primary goal is to maintain sustainable yields without causing undesirable results.

1.1.1. GSAs & GSPs

Any local public agency that has water supply, water management, or land use responsibilities in a basin can decide to become a GSA. A single local agency can decide to become a GSA, or a combination of local agencies can decide to form a GSA by using either a Joint Power Authority (JPA), a memorandum of agreement (MOA), or other legal agreement. If no agency assumes this role the GSA responsibility defaults to the County; however, the County may decline.

A GSP may be any of the following (*Water Code § 10727(b)*):

- A single plan covering the entire basin developed and implemented by one GSA.
- A single plan covering the entire basin developed and implemented by multiple GSAs.

¹ Sections on SGMA are largely drawn, in whole or in part, from publicly available materials from the Department of Water Resources. For more see: <http://www.water.ca.gov/groundwater/sgm>

Chapter 1

- Subject to Water Code Section 10727.6, multiple plans implemented by multiple GSAs and coordinated pursuant to a single coordination agreement that covers the entire basin.

If local agencies are unable to form an approved GSA and/or prepare an approved GSP in the required timeframe, then the basin or subbasin would be considered unmanaged. Unmanaged groundwater basins and subbasins are subject to State Water Resources Control Board (State Board) oversight. This is true even if the vast majority of the subbasin is covered by a plan. Should intervention occur, the State Board is authorized to recover its costs from the GSAs.

1.2. SGMA Communications and Engagement Requirements

SGMA includes specific requirements for communications and engagement by each planning phase. **Figure 1** (next page) illustrates the requirements and provides water code references. The GSP submittal guidelines also describe the outreach and engagement documentation to be submitted with the plan. **Table 2** describes the submittal requirements. A full list of codes and requirements is also provided in **Appendix 1**.

Table 2. GSP Submittal Requirements²

GSP Regulations Section	Requirement	Description
Article 5. Plan Contents, Sub-article 1. Administrative Information		
354.10	Notice and Communication	<ul style="list-style-type: none"> • Description of beneficial uses and users • List of public meetings with dates • GSP comments and responses • Decision-making process • Public engagement process • Method(s) to encouraging active involvement • Steps to inform the public on GSP implementation progress

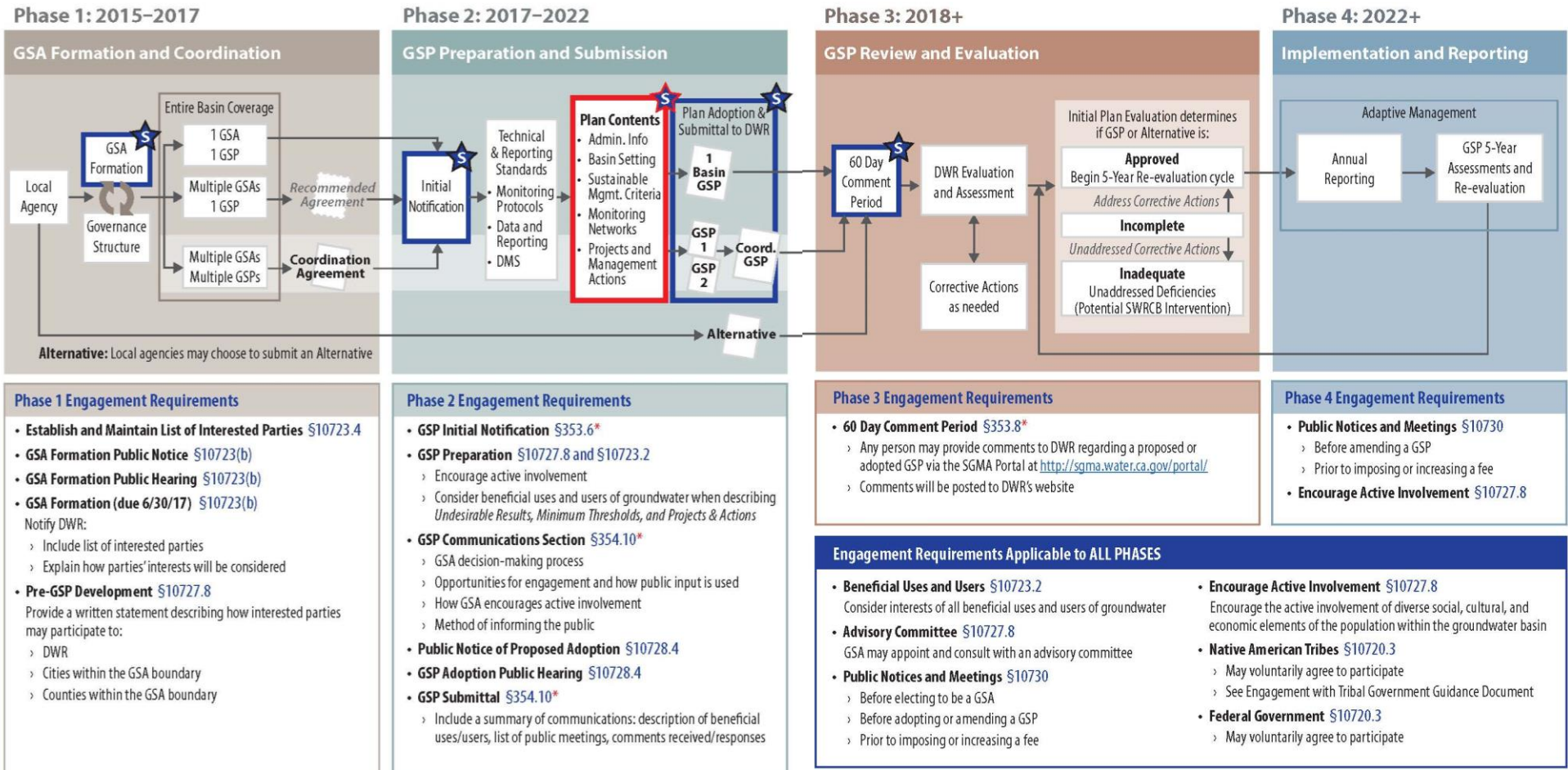
1.3. Planning Approach

While the SLDMWA is assisting with the coordination of GSP(s) development, this Communications Plan (Coms Plan) is offered for the voluntary use of all of the GSAs of the Delta-Mendota Subbasin. A full Coms Plan schedule should be developed in conjunction with the overall GSP(s) development schedule. One additional option is for the Coordination Committee of GSAs to provide overall communications guidance. This could potentially be included in a section of the Coordination Agreement.

² Guidance Document for the Sustainable Management of Groundwater, Preparation Checklist for GSP Submittal, Department of Water Resources, December 2016

Stakeholder Engagement Requirements by Phase

Figure 1. Stakeholder Engagement Requirements



Stakeholder Input
 Stakeholders should be informed throughout the development of Plan Content

Code References: §(#) = SGMA, §(#)* = GSP Regulations

Source: Guidance Document for Groundwater Sustainability Plan Stakeholder Communication and Engagement Department of Water Resources, June 2017

Chapter 1

An important additional step will be establishing, in conjunction with the multiple GSAs, the roles and responsibilities for implementing the Coms Plan.

1.4. *SGMA and the Delta Mendota Subbasin*³

The Delta-Mendota Subbasin of the San Joaquin Valley Groundwater Basin is a long, relatively narrow groundwater basin that covers portions of five counties, from north to south, San Joaquin, Stanislaus, Merced, Madera and Fresno Counties (see **Figure 2**). The Delta-Mendota sub-basin is bounded on the west by the Tertiary and older marine sediments of the Coast Ranges. The northern boundary (from west to east) begins on the west by following the Stanislaus/San Joaquin County line, then deviates to the north to encapsulate all of the Del Puerto Water District before returning back to the Stanislaus/San Joaquin County line. The boundary continues east then deviates north again to encapsulate all of the West Stanislaus Irrigation District before returning back to the Stanislaus/San Joaquin County line. The boundary continues to follow the Stanislaus/San Joaquin County line east until it intersects with the San Joaquin River.

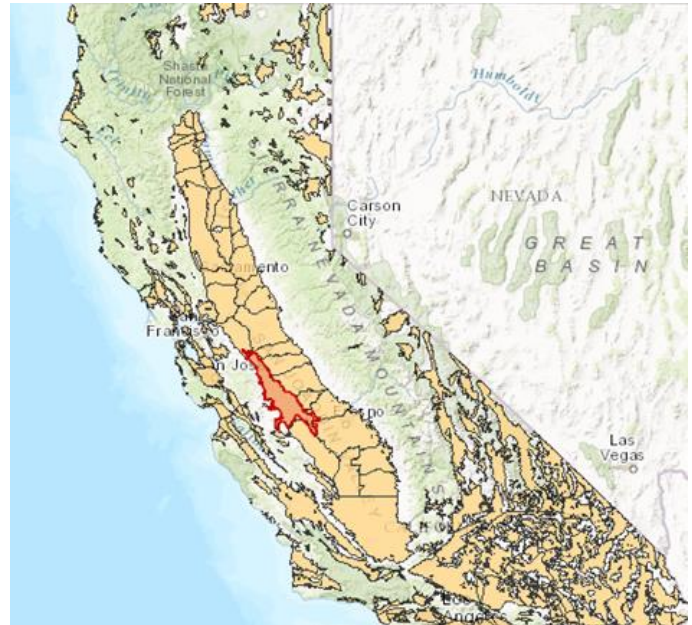


Figure 2. Delta Mendota Subbasin

The eastern boundary (from north to south) follows the San Joaquin River to within Township 11S, where it jogs eastward along the northern boundary of Columbia Canal Company and then follows the eastern boundary of Columbia Canal company until intersecting the northern boundary of the Aliso Water District. The boundary then heads east following the northern and then eastern boundary of the Aliso Water District until intersecting the Madera/Fresno County line. The boundary then heads westerly following the Madera/Fresno County line to the eastern boundary of the Farmers Water District. The boundary then heads southerly along the eastern boundary of the Farmers Water District, and continues southerly along the section line to the intersection with the northern right-of-way of the railroad. The boundary then heads east along the northern right-of-way of the railroad until intersecting with the western boundary of the Mid-Valley Water District. The boundary then heads south along the western boundary of the Mid-Valley Water District to the intersection with the northern boundary of Reclamation District 1606. The boundary then heads west and then south following the boundary of Reclamation District 1606 and James Irrigation District until its intersection with the Westlands Water District boundary.

The southern boundary (from east to west) matches the northerly boundaries of Westlands Water District legal jurisdictional boundary last revised in 2006. The boundary then

³ Information related to the Delta Mendota subbasin is drawn directly from <http://sgma.water.ca.gov/basinmod/basinrequest/preview/23>.

proceeds west along the southernmost boundary of the San Luis Water District. The boundary then projects westward from this alignment until intersecting the Delta-Mendota sub-basin Western boundary described above.

1.5. Delta-Mendota Subbasin GSP Planning

The GSAs of the Delta-Mendota Subbasin intend to work together to meet Sustainable Groundwater Management Act (SGMA) requirements and prepare a Groundwater Sustainability Plan (GSP) or coordinated Sustainability Plans by June 31, 2020. The San Luis Delta- Mendota Water Authority (SLDMWA) is assisting its members and non-members in planning and implementation of this law and has been directly assisting a subset of the local GSA eligible agencies in organizing to accomplish required SGMA tasks. The SLDMWA has also hosted informal, information meetings with all of the subbasin GSAs.

While SLDMWA coordinated GSAs are confident in their ability to prepare a GSP for the areas under their jurisdiction, SGMA requires that an approved GSP or multiple coordinated GSPs are in place to provide sustainable management for the entire subbasin. The identified GSAs have been asked to determine how they wish to proceed in individual GSP development or a coordinated single GSP by July 2017 and whether or not they wish to participate in the Prop 1 Sustainable Groundwater Planning Grant as a joint request.

1.6. Delta Mendota Subbasin GSAs

Following are the DWR identified agencies (as of June 15, 2017).⁴

1. Aliso Water District
2. Central Delta-Mendota Region Multi-Agency GSA
3. City of Dos Palos
4. City of Firebaugh
5. City of Gustine
6. City of Los Baños
7. City of Mendota
8. City of Newman
9. City of Patterson
10. County of Madera—3
11. DM-II
12. Farmers Water District
13. Fresno County—Management Area ‘A’
14. Fresno County—Management Area ‘B’
15. Grasslands Groundwater Sustainability Agency
16. Merced County—Delta-Mendota

⁴ See: <http://sgma.water.ca.gov/portal/>

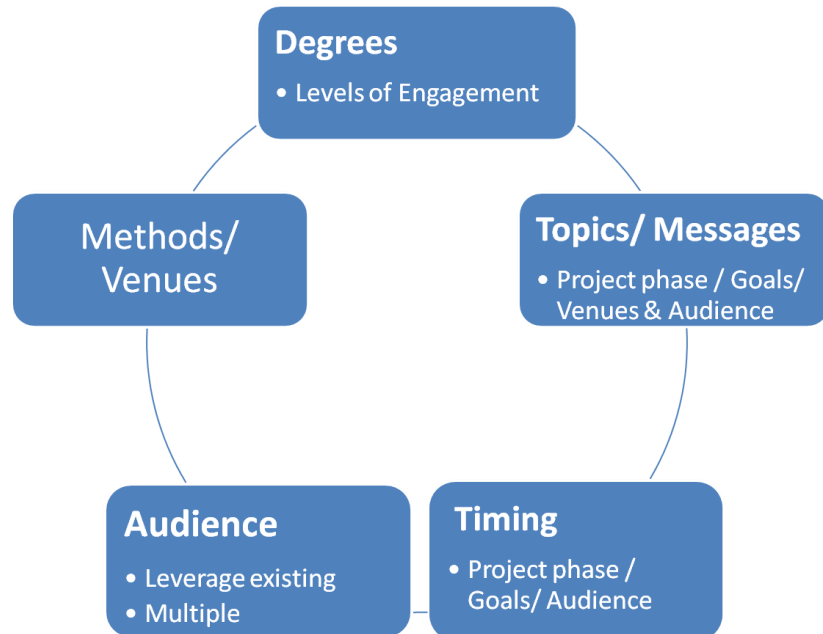
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17. Northwestern Delta-Mendota GSA
18. Ora Loma Water District
19. Patterson Irrigation District
20. San Joaquin River Exchange Contractors Water Authority
21. Turner Island Water District-2
22. West Stanislaus Irrigation District GSA
23. Widren Water District GSA

COMMUNICATIONS PLAN OVERVIEW

Communication is the process of transmitting ideas and information. According to the Project Management Institute, 75%-90% of a project manager's time is spent communicating. A Coms Plan provides the purpose, method, messages, timing, intensity, and audience of the communication, then describes who will do the communicating, and the frequency of the communication (see **Figure 3.**)

Figure 3. Elements of a Communications Plan



2.1. Purpose

The purpose of the Delta-Mendota Subbasin, Sustainable Groundwater Management Act, Coms Plan is to outline the information and communications needs of the project stakeholders and provide a roadmap to meet them. The Coms Plan then identifies how communications activities, processes, and procedures will be managed throughout the project life cycle.

2.2. Importance

While communications are important in every project, a well-executed communications strategy will be essential to the success of the GSP(s) development and adoption process. The financial and regulatory stakes are high and communication missteps can create project risks. Further, development of a viable GSP(s) will require an on-going collaboration among all the stakeholders, both organizational and external. The plan will be comprehensive and consider multiple variables, a range of system elements and project costs and benefits. Stakeholder input will be needed to refine GSP requirements and fully

Chapter 2

define the water management system, and potential impacts, costs and benefits that may result in managing for sustainability.

2.3. Scope

The plan focuses on formal communication elements. Other communication channels exist on informal levels and enhance those discussed within this plan. This plan is not intended to limit, but to enhance communication practices. Open, ongoing communication between stakeholders is critical to the success of the project.

2.4. Communications Goal

Development, adoption and implementation of the GSP(s) will require basin external stakeholders, other agencies, staff, managers, and the multiple GSA Boards to evaluate choices, make decisions and commit resources.

The core communications goal is to plan for and efficiently deliver clear and succinct information:

- At the right time
- To the right people
- With a resonating message

This is done to facilitate quality decision making and build accompanying public support

2.5. Communications Objectives

The Coms Plan Objectives are to present strategies and actions that are:

- Realistic and action-oriented
- Specific and measurable
- Minimal in number (a few well delivered are better than many mediocre efforts)
- Audience relevant

2.6. Strategic Approach

Three primary communications strategies have been identified for the GSP(s) development.

- 1) Fully leverage the activities of existing groups. This practical approach is cost effective and respectful of the limited time that stakeholders have to participate in collaborative processes.
- 2) Provide targeted, communications and outreach to opinion leaders in key stakeholder segments.
- 3) Provide user friendly information and intermittent opportunities through existing communication channels and open houses or workshops to allow interested stakeholders (internal and external) to engage commensurate with their degree of interest.

2.7. Communications Governance, Communications Team

Given the relatively large number of stakeholders, a recommendation for coordinated efforts, and the legal requirements for outreach⁵, some form of communications governance is recommended. Several governance options for consideration are offered in Appendix 2. The actual form of the governance is less important than a clear understanding of the roles and responsibilities of those responsible for ensuring required communication. For the purpose of this document, an assumption is made that some form of governance will be identified and a communications team (which may be an individual or multiple individuals, and/or include the project consultants) is designated.

A driving consideration for this recommendation is the level of effort associated with required activities and the fact that communications are highly time dependent. That means that communications activities should be occurring that may happen outside of regularly scheduled GSA meetings. In this case delegation with guidance is efficient and effective.

2.8. Constraints

All projects are subject to limitations and constraints as they must be within scope and adhere to budget, scheduling, and resource requirements. These constraints can be even more challenging in projects with multiple agencies as will be the case with the development and coordination of multiple GSPs.

There are also legislative, regulatory, technology, and other organizational policy requirements which must be followed as part of communications management. These limitations must be clearly understood and communicated where appropriate. While communications management is arguably one of the most important aspects of project management, it must be done in an effective and strategic manner recognizing and balancing the multiple constraints.

All project communication activities should occur within the project's approved budget, schedule, and resource allocations. The GSP(s) project managers and the leadership of the participating GSAs should have identified roles in ensuring that communication activities are performed.

To the extent possible, to support collaboration and reduce costs, GSP(s) partners should utilize standardized formats and templates as well as project file management and collaboration tools.

⁵ See Appendix 1

SITUATION ASSESSMENT

3.1. Introduction

The challenges of asking a community to make changes in how things are done, or forging an agreement among multiple parties are often large. Prior to preparing a Coms Plan, a neutral, 3rd party facilitator conducted a stakeholder Situation Assessment (SA).

The facilitator's role was to provide an independent evaluation of potential stakeholder's interest in coordination and governance for GSA formation and GSP development and identify any barriers or concerns that would need to be addressed for the GSA formation process and GSP(s) development to be successful.

3.2. Situation Assessments

An SA is an information-gathering process that informs outreach, engagement and collaboration. As part of preparing the basin communication's process, it was important to know more about:

- Stakeholder Categories
- Opinion leaders
- Regulatory and political context
- Advocates and detractors
- Attitudes and knowledge
- Other elements useful to the crafting of decisions

An assessment is also a low risk approach to education and signaling a future relationship. It facilitates the community's appraisal of its needs, wants and values. A well-crafted assessment sets the stage for the parties to better understand and interpret their situation so that they can make informed decisions for actions, in the short term and for the future.

The Delta-Mendota subbasin SA included background research and interviews. Interviews were usually with individuals but in a few cases a very small group was convened. To encourage candor, the results of the input process were bundled so those interviewed were not individually identified unless they explicitly indicated they wished to share their individual response.

3.3. Background Research

The facilitator worked closely with the SLDMWA and DWR to identify useful documents, plans and activities that might inform the overall communications planning process.

3.4. Interviews and Consultations

Using information gathered during the background research and similar GSA formation efforts throughout the state, the facilitator worked with the SLDMWA to craft interview questions. The facilitator also provided some selection criteria to the SLDMWA to help identify a representative group of interview candidates. Once selected, the SLDMWA staff and facilitation team invited the interviewees to participate. In addition to full interviews,

additional calls and in person communications were conducted to acquire amplifying information. **Figure 4** provides a quick overview.

Figure 4. Interview and Consultation Quick Facts



Selected participants were all engaged or otherwise stakeholders in some aspect of the basin GSA development process.

A project background sheet was provided in advance of each formal interview and used again during the interviewee discussions with the facilitator. Each interview followed the same format and included 16-18 questions (depending on whether or not a follow-up question was needed).

The questions covered the following topics pertaining to the GSA formations and GSP(s) development:

1. Overarching perspectives from each key stakeholder on general groundwater conditions, GSA governance; subbasin management and associated SGMA compliance
2. Preferred methods to achieve groundwater sustainability consistent with SGMA requirements
3. The level of agreement/conflict around groundwater governance across the range of stakeholder perspectives
4. Experience with facilitated processes, outreach and engagement, and the goals for such support
5. Potential configurations of governance and formations of GSAs and GSP development

3.5. ***Summary of key findings***

Interview results indicate an overall positive environment for the project and project communications; however, the effort will require interactions of a large number of parties and planning for an extremely complex system. Following are the reflections, ideas and suggestions of those contacted.

3.5.1. Related to Groundwater Sources and Trends

- *Significant observed impacts associated with Weather, Water Project Deliveries and Cropping Patterns* – Participants observed a declining

groundwater situation and were able to attribute it to drought and weather (particularly timing of seasonal rainfall and periods of prolonged, higher temperatures), conversion to permanent crops, and significant changes in access to surface water.

- *Surface & Groundwater Nexus* – As noted in comments related to access to surface water, there was a clear understanding of the surface/groundwater nexus. Many believed that any realistic solution would have to include a full assessment of the region’s surface water future.
- *Extremely Complex Systems* – Many of those interviewed reported that parts of the subbasin were doing fine and could, with good management, be sustainable. They described problems as being primarily in pockets of the subbasin. They also characterized some parts of the subbasin as not being managed sustainably and indicated that they believe this would have continued had SGMA not passed. While it was generally agreed that it would have been better if SGMA was not driving the change, they felt change would not occur without something like SGMA. Several of the participants were able to describe specific locations and situations that illustrated this.

Issues related to operations of the Bureau of Reclamation, the Delta-Mendota Canal (DMC), the Mendota Pool and restoration activities are of keen interest to all the stakeholders. Everyone was familiar with issues of subsidence and with the facts and figures represented in graphics like those in **Figure 5**, prepared by the United States Geological Survey (USGS).⁶

Many perceived that groundwater supplies for municipal uses in some parts of the basin were at risk.

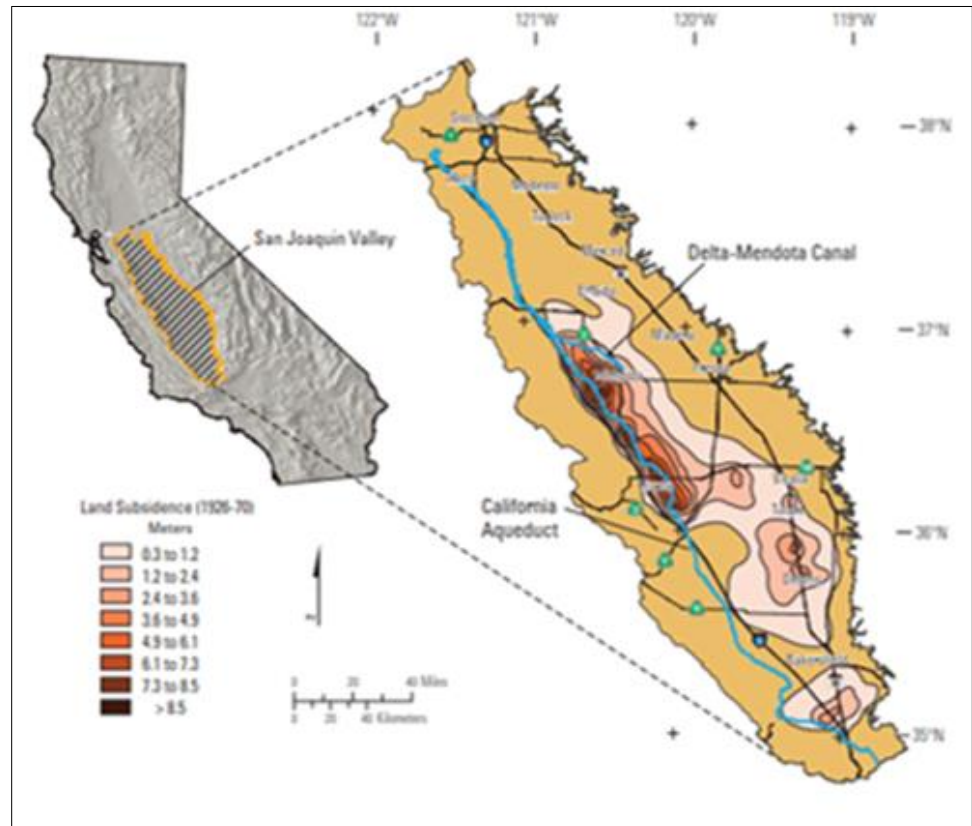
- *Historic Rights and Arrangements* – Access to surface water is based on numerous historic rights and agreements as well as more contemporary agreements. As such there is no **single** description of the status of surface water availability among the many subbasin GSAs,⁷ although there is a strong understanding of the rights and arrangements that do exist.⁸

⁶ U.S. Department of the Interior | U.S. Geological Survey: <https://ca.water.usgs.gov/projects/central-valley/delta-mendota-canal.html>, Page Last Modified: Monday, 20-Mar-2017 22:39:47 EDT

⁷ A full inventory of water rights and arrangements for the subbasin GSAs is recommended to be prepared as part of the GSP planning process.

⁸ In 2010 there were 1,403 water rights claimed in the San Joaquin Delta watershed, the largest number of any watershed in the State. [Source: Associated Press: Original data source is State Water Resources Control Board eWRIMS, Database]

Figure 5. USGS Illustration of the DMC and Subsidence



The hierarchy of water rights as well as laws related to groundwater rights will be a significant factor in GSP negotiations.

Another historical factor related to sustainability is the character of land ownership. There was a perceived difference in the values placed on sustainability by multi-generational family farms versus investor driven agriculture and/or water development.

3.5.2. Related to GSA Governance; Subbasin Management and SGMA Compliance

- *Numbers* - The subbasin includes numerous Water Agencies (35) and other potential GSA eligible agencies including Cities and Counties (such as Dos Palos, Firebaugh, Gustine, Los Baños, Mendota, Newman, Patterson, Fresno, Madera, Merced, San Joaquin, and Stanislaus) and Community Service Districts (CSDs) including among others Grayson, Westley, and Volta, as well as multiple Resource Conservation Districts (RCDs) that for the most part were within the general boundaries of other GSA eligible authorities (Panoche, Poso and Grasslands as an example).

By the June 30, 2017 filing deadline, 23 eligible entities had formally filed GSA formations and met SGMA requirements for subbasin coverage.

Even with this large number of GSA entities, during the SA interviews and in a follow-up survey, most agencies indicated a preference for a reduced number of GSPs and potentially just one or two.

At the time of this assessment there was not a full understanding of all of the potential requirements of being a GSA and ultimately what might be required to prepare a compliant GSP.

Table 3. Number of Subbasin Public Water Agencies

Number of Public Water Agencies		
• Merced County	• Foothill WD	• Panoche WD
• Fresno County	• Fresno Slough WD	• Patterson WD
• Broadview WD	• Grasslands WD	• Romero WD
• Centinella WD	• Hospital WD	• Salado WD
• Central California ID,	• Kern Canon WD	• San Luis Canal Company
• Davis WD	• Laguna WD	• San Luis WD
• Del Puerto WD	• Mercy Springs WD	• Santa Nella C.WD
• Eagle Field WD	• Mustang WD	• Sunflower WD
• El Solyo WD	• Oak Flat WD	• Tranquility ID
• Farmers WD	• Orestimba WD	• West Stanislaus ID
• Firebaugh Canal WD	• Oro Loma WD	• Widren WD
	• Pacheco WD	• Quinto WD

At the time of this assessment participants did not fully recognize the potential number of stakeholders and/or the requirements to conduct outreach.

- *Subbasin Governance Structures* – Many individuals and entities within the subbasin have experience working in cooperative governance and related structures. For example, the SLDMWA provides leadership for an Integrated Resource Water Management Plan (IRWMP) illustrated in **Figure 6**⁹ on the following page. Many of the stakeholders are also involved with Irrigated Lands Coalitions (see **Figure 7**).¹⁰

Likewise, many are also involved in efforts related to the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative (see **Figure 8**).

⁹ Source : San Luis & Delta-Mendota Water Authority, Westside-San Joaquin Integrated Water Resources Plan, July 2014

¹⁰ Source: Central Valley Regional Water Resources Control Board

Existing Cooperative / Collaborative Governance Structures with Delta Mendota Subbasin Stakeholders



Figure 6. Integrated Regional Water Management Groups

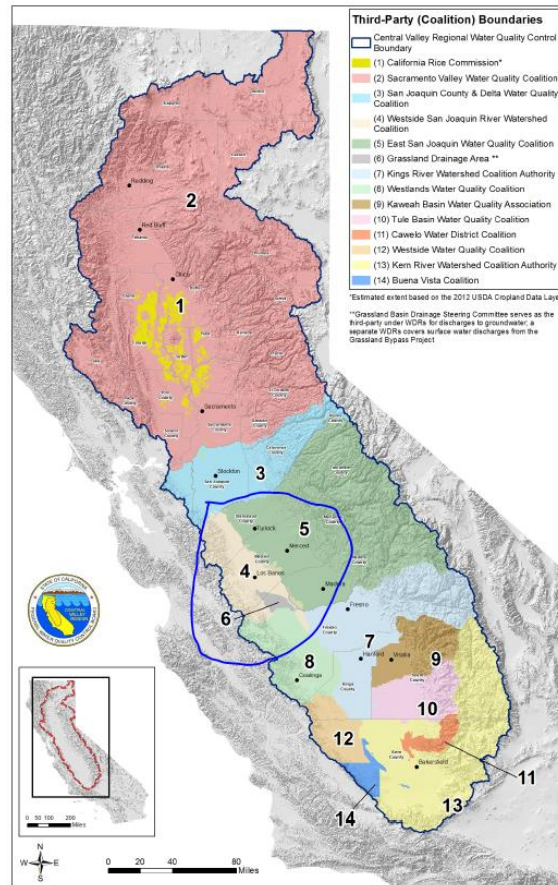


Figure 7. Irrigated Lands Coalitions

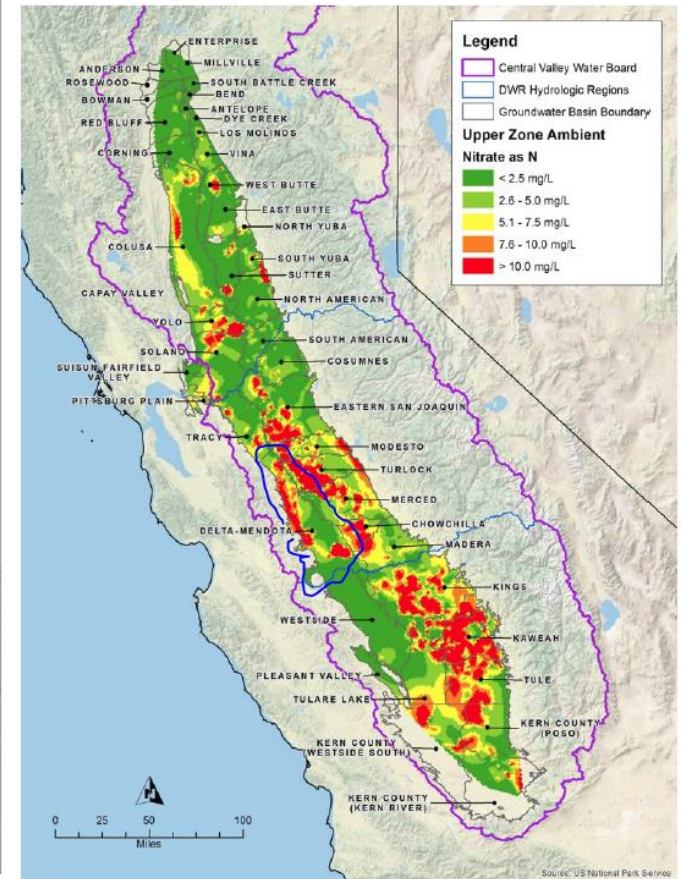


Figure 8. CV-Salts Initiative

CV-Salts was launched to develop sustainable salinity and nitrate management planning for the Central Valley. (See **Figure 8.**¹¹)

Finally, there are multiple arrangements in place related to surface water transfers and other previous groundwater management planning efforts.

Experience with these programs has created a capacity for collaborative planning that will be essential for GSP development. It also creates opportunities to access and leverage existing stakeholder meetings and events rather than needing to convene multiple new stakeholder processes.

3.5.3. Issues to be Addressed in Creating a Sustainability Plan

Some of the participants indicated they had an extremely good understanding of their section of the subbasin, with exact and extensive records to support their perspective. They found that making projections using historical data had been more reliable than some of the groundwater models that were in use.

In thinking about development of a GSP they felt there could be some difficulty in developing water balances due to lack of quality data for some locations. Another mild concern was the potential for disagreements about the selection of a groundwater model(s) or reconciling differences among methods.

Still another concern was the capacity of the GSAs and/or GSA members to fully participate. Some of these agencies are very lightly staffed and have varying levels of knowledge related to groundwater management. All of the participants had significant other duties prior to the passage of SGMA.

One concern, expressed after completion of the assessment, was the potential for some agencies to simply opt out of participating in the development of a GSP but still receive the benefits of the region having an approved plan without having contributed to the larger good of the subbasin.

3.5.4. Representation

The State Board lists the following as Required Interested Parties for the purpose of SGMA outreach:

- All Groundwater Users
- Holders of Overlying Rights (agriculture and domestic)
- Municipal Well Operators and Public Water Systems
- Tribes
- Counties
- Planning Departments /Land Use
- Local Landowners
- Disadvantaged communities
- Business

¹¹ Ibid



- Federal Government
- Environmental Uses
- Surface Water Users (if connection between surface and ground water)

All of these stakeholder categories were contacted in the interview process excepting tribes. In the case of tribes, there are no classified tribal lands in the Delta-Mendota subbasin, therefore no planning, outreach or communication needs are currently anticipated for tribes.

Due to subbasin characteristics, a primary focus of the assessment was on agricultural, disadvantaged communities (DACs) and municipal groundwater users.

- *Related to Agricultural Representation* - most respondents believed that the elected leadership of the GSA agencies would do a good job in representing agriculture and noted that many of them were growers themselves. It was also noted that farmers were busy and would be far more interested in any specifics of a GSP that would impact operations or the degree of certainty about water availability than the particulars of GSA governance.
- *Regarding DACs* - Much of the subbasin and its counties (San Joaquin, Stanislaus, Merced, and Fresno) have communities that meet the DAC definition and the region is generally considered disadvantaged. The ability of DACs to participate in GSP development was considered limited and it was thought that there would be a need for specific and direct outreach to DACs through elected leadership and via use of trusted community advocates. As part of the SA, several of those interviewed identified themselves as being able to represent a DAC perspective and one in particular was particularly concerned about the availability of Spanish language materials. As a result, Spanish language materials were included in the meeting materials of the public GSA adoption meetings and the SLDMWA provided a fluent Spanish speaker to assist with meetings.



In the past, to promote DAC identification and involvement, the Westside-San Joaquin IRWM previously conducted an extensive survey of private and public community representatives to educate and encourage understanding of the IRWM process, to help understand the issues confronted by DACs, and to

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better address the needs of minority and/or low-income communities. This effort resulted in identification of DACs in the Region and an initial list of 22 projects that would benefit DACs and low-income communities. Given known constraints on this community it is recommended that more focused DAC outreach should be coordinated with the IRWM. This effort is now in progress.

- *Regarding Municipals* - The SA outreach also included interviewing Municipal Stakeholders. A significant number of the Cities are fully dependent on wells for water supply and issues related groundwater management are of grave concern. These representatives all felt that even while it would be difficult to make time to participate in GSAs and GSP development, that they must make the time. Many had also determined that they wished to form their own GSA to reflect their specific interests in any kind of broader GSP negotiation.
- *Regarding Environmental Interests* - There appeared to be a less defined stakeholder segment representing traditional, environmentally focused issues. Outreach was made to subbasin government agencies that often serve as a surrogate for these interests and an informal consultation occurred with a representative of the Planning and Conservation League to identify any known, active stakeholders. However, no specific entity or individual was identified by those contacted. A general perception was that this community would desire engagement and would designate representatives if the GSP development was thought to potentially impact existing restoration or other environmental concerns but the formation of GSAs per-se, was of less interest. The next phase of communications should include outreach to organizations such as Audubon, the Nature Conservancy and Ducks Unlimited just to ensure due diligence. These connections will be important going forward, particularly if environmental issues are identified.
- *Regarding Industrial Users* – The region includes some industrial water users. This sector has a relatively lower percent of water use compared to other subbasins users; however, representatives of the sector pointed out how essential access to water was to their industry. The interviewees also emphasized how important these industries were to the local economies. There was a stated concern about representation since there didn't appear to be a direct way to engage, particularly with multiple GSAs being formed.





- *Regarding Counties & Planning Agencies* – All of the subbasin counties have designated representatives and all are assisting with GSA coverage for areas not otherwise covered by a GSA. All of the city and county representatives had direct engagement with the planning arms of their jurisdictions, or were staff to the planning departments. These representatives, like the municipal representatives, viewed this as critical issue even as it creates new workload for the already busy entities.

3.5.5. Communications and Facilitation Preferences

Participants were asked to describe their communications preferences. Several offered specific suggestions on written materials. Most did not believe there would be a need for a high frequency of communications directly with non-GSA stakeholders.

Several suggested using regularly scheduled activities of existing groups and gatherings to share information rather than creating stand-alone events. They listed annual meetings of the water agencies as one good venue as well as meetings related to the IRWM and Irrigated Lands. Several also thought that it would be good to go to places like Farmers Markets, particularly for the disadvantaged communities, and County Fairs.

Farm Bureau representatives also indicated a willingness to support outreach efforts. The Merced Farm Bureau, in particular, has already helped to advertise public meetings related to GSA formations.

Related to facilitation there was not a broad exposure to professional facilitators among many of the stakeholders. Even so, participants consistently listed qualities such as fairness and transparency, a good understanding of the issues, and confidence as helpful facilitator strengths. There was a sense that the GSAs would not need hand holding but that facilitation could be useful for helping the stakeholders forge decisions and making what many believed would need to be compromises.

3.5.6. Success Factors, Barriers to Success

The participants were asked to describe their view on the odds for success as well as any barriers that would prevent successful completion of a GSP.

Overall, most participants expressed a medium to high likelihood for success. They noted that the carrot (grants and technical support) and stick (significant regulatory intervention) by the State creates a dynamic that is supportive to success.

Participants stated barriers related to the capacity of the GSAs to participate and ultimately agree to, and implement changes. The much diffused governance structure of multiple GSAs amplifies this dilemma as do actions beyond the control of the subbasin entities (such as climate and water deliveries).

In addition to perceived barriers, participants outlined their thoughts on opportunities and success strategies.

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- *Drought* – While the drought was unwelcome it increased awareness of the need for changes. Many felt it would be easier to move forward while the topic is prominent in everyone’s minds.
- *Short and Long Game* – Several suggested it will be important to have a plan that includes long and short term strategies and activities.
- *Integrated Planning* – Many of the participants emphasized the importance of integrated planning.

3.5.7. Other Comments and Advice

Many participants expressed appreciation for being contacted and invited the facilitator to contact them again if there were questions.

3.6. ***Promising messages and methods***

Three primary communications strategies have already been identified for the GSP(s) development:

- Leveraging the activities of existing groups
- Providing targeted, communications and outreach to opinion leaders in key stakeholder segments
- Providing user friendly information and intermittent opportunities for a broader range of stakeholders

The same strategies aligned with the recommendations of the SA participants. These methods will allow stakeholders to engage commensurate with their degree of interest while providing sufficient information to ensure long-term success for plan development and implementation.

AUDIENCES AND MESSAGES

GSA formation and GSP(s) development, like most large planning efforts, consists of a broad range of stakeholders with differing interests and influence.

4.1. Two Core Audience Segments

This Coms Plan Anticipates two core audience segments. First is the subbasin GSA Boards and the communications among and between themselves. This audience segment is significant in size given that 23 GSAs will be working to develop a GSP(s) and each GSA has its own Board and audiences.

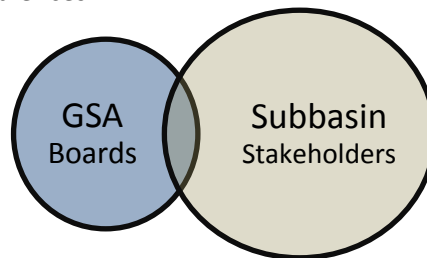


Figure 9. Two Core Audience Segments

The second audience is the subbasin stakeholders as identified in SGMA. This audience is also large. Many of the stakeholders are shared by the GSA Boards and some of the larger stakeholder segments are also represented on the GSA Boards (see **Figure 9**).

Nearly all of the communications strategies apply to both segments; however, some strategies apply to one or the other specifically and are so identified.

4.2. Communications and Change Management

The process of adopting and implementing a GSP will require significant change management. Communications planning should encompass basic change management approaches. Messages should also evolve over time and be tied to the planning process and key decision points. Then, for each audience and each major planning step, communications must do the following:

1. Describe what the actual proposed plan (change) is
2. Articulate how the change will directly impact the category of stakeholder involved
3. Outline the methods that will be used to implement the plan (change)
4. Define the costs and benefits of changing and not changing, and what future conditions will be if change does not occur
5. Consider unintended consequences and others that may also be impacted by the same change then develop a strategy to engage them
6. Offer opportunities for input and for stakeholders and others to improve the approach

The communications requirements for large changes are often underestimated. Some experts indicate that messages may need to be delivered up to 8 different times to be fully absorbed. Communications needs will also evolve as the GSP planning progresses. **Table 4** provides a sample of early communications that focus on SGMA and groundwater basics.

Table 4. Sample – Early Phase Message Elements for Subbasin Stakeholders

Element	What the Change Is	How it will affect the Stakeholder	How the change will be Implemented	Why it is a good idea
Early Phase GSP Development	<ul style="list-style-type: none"> Locally governed GSAs will work together to sustainably manage ground water. The Subbasin /Basin is required to ensure Sustainable Groundwater Management by submitting a sustainability plan by 2020. The plan must be implemented and found to result in sustainable management by 2040. 	(Unique to audience type) <ul style="list-style-type: none"> Changes in the current methods of acquiring and utilizing groundwater may occur. May affect future decisions related to crop types and decisions related to conjunctively using surface water. May provide additional project resources to the DAC communities. 	A collaborative approach is being undertaken to prepare the plan with multiple GSAs coordinating with the SLDMWA as the planning organizer.	<ul style="list-style-type: none"> Sustainable and wise use of groundwater allows for the success of future generations and creates greater certainty for today's beneficial users. Failure to act may result in negative regulatory consequences.

As part of the GSP planning process, the next phase of communications will also need to communicate the requirements for sustainability and how they are achieved in the context of the Delta-Mendota subbasin. Then, communications related to GSP specifics and adoption will require additional outreach, targeted to specific audiences.

4.3. Tied to Decision Making

Communications should also be tightly linked to decision making. For each anticipated decision, stakeholders for that decision should be identified and the following addressed.

1. Who (Is the stakeholder)
 - a. An impacted party?
 - b. A potential planning partner?
 - c. A potential provider of services or resources?
 - d. A regulator of the activity?

(Note: Maybe more than one category.)

2. What (What is the interest of the stakeholder? How will the stakeholder be affected? What are the stakeholders' needs?)
3. Who (Who is the right messenger for the information)
4. How (How should the information be delivered? What are the best methods?)
5. When (What is the appropriate timing for the messages?)
6. Engagement and Knowledge Transfer (How do we create two-way communications?)

Table 5 illustrates some of these ideas.

Table 5. Communications Planning Questions

Who	Interest	Messenger	Delivery	Timing	Knowledge Transfer
<ul style="list-style-type: none"> • Impacted • Partner • Provider • Regulator 	<ul style="list-style-type: none"> • How will decision affect? • What will stakeholder need? 	<ul style="list-style-type: none"> • Who is a trusted information Source? • How do we ID and Partner 	<ul style="list-style-type: none"> • What are the best delivery methods? 	<ul style="list-style-type: none"> • When should we conduct outreach? 	<ul style="list-style-type: none"> • What do the stakeholders know that we need to know?

4.4. GSA Boards

Due to the multiple subbasin GSAs, specific focus is needed on communications to keep them informed, provide consistent updates and information that the Boards can use in their own outreach, and support their decision making. Primary objectives for communications with the subbasin GSA Boards are to ensure:

- Consistent understanding of the requirements for a GSP and/or GSP coordination
- On-going access to current information
- Timely notice of any significant developments or decision points that may require changes to policies and/or require some other board action
- Confidence that the GSP(s) will be accepted by the GSA's stakeholders

Key communications activities involving the Board include;

1. Providing short and digestible pieces of information to ensure each Board member can quickly articulate to his/her constituents on key matters and remain sufficiently informed so that no decision points are surprises.
2. Provide user-friendly informational materials to be used with public audiences, and will support the Board with their own constituent outreach.
3. Utilize regular Board communications for routine updates and reserve specific Board agenda items for highly significant discussion items.

4.5. Primary Audiences

There are several core stakeholder groups that will require ongoing communications and tailored messaging throughout the planning process. They are:

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- Agriculture
- Disadvantaged Communities
- Municipals

Other stakeholders requiring special consideration include:

- Industrial Users/ Business
- Regulators (State and Federal)
- Potential Partners
- Environmental Organizations
- Federal Agencies

While all of the stakeholder types are important to engage for development of a GSP, the first three will be most affected by any changes that might be proposed as a result of the *GSP(s)*.

The following provides an outline of key messages and activities in support of each of the audience types.

4.2.1. Agricultural

Messages about the GSP(s) development should feature the overall desirability of a sustainable management approach how the plan will contribute to management certainty and protect against regulatory oversight.

In thinking about irrigation users it is also important to remember that one size does not fit all.

4.2.2. Disadvantaged Communities

Messages developed for this sector should be tailored and specific to the community. This type of outreach is often best served by use of surrogates and trusted messengers. As identified in the SA, these messages should be aligned with activities of the IRWM, especially given the high, current dependence of many on unsustainable water sources. Messages about ways to access the increased availability of resources due to grant incentives should also be considered.

A specific outreach method to consider relates to the predominance of cells phones within the communities. According to the Pew Research Center, “over 50 percent of low-income households own a smartphone. Smartphone penetration in this demographic creates substantial opportunities for utilities to reach disadvantaged communities with software solutions like customer self-service platforms and targeted digital communications.”¹²

4.2.3. Municipals

¹² Secondary Source: Water Smart. <https://www.watersmart.com/rethinking-disadvantaged-community-engagement/> (accessed June 1, 2017)

Some care will be needed to address tensions related to the relative percentages of use by Municipal agencies and what constitutes highest and best beneficial uses within an agricultural region. A promising interaction with this community would involve collaboration on messaging to achieve mutually beneficial goals.

Some thought it might be possible for the municipal agencies to provide in-kind support to the GSP development process through support for project websites and mailing lists, production of meeting notices, assistance to the planning process from in-house public information professionals and offering access to physical meeting spaces.

Municipals may need assistance in making the case for the need to think at a Basin scale rather than more local terms.

4.2.4. Business and Industry Interests

Business and industry interests seek assurances about the availability of water for operations and the viability of the farming industry in the region. Messages for these audiences should focus on how the GSP(s) development will contribute to sustainability and how these audiences can participate in discussion specific to their interests.

4.2.5. Regional/Statewide Interests and Regulators

Some degree of uncertainty remains in the overall legal, legislative and regulatory environment as it relates to SGMA implementation.

It is in the interest of the subbasin stakeholders to engage state and federal agencies and regulators throughout the process. These parties may have resources to assist the subbasin and a cooperative attitude will build good will in the event that adjustments are needed to achieve SGMA compliance.

4.2.6. Potential Agency Partners

A variety of collaborations to achieve GSP(s) development goals may be possible. The GSAs should consider the potential for collaboration with non-GSA members and inter-basin (adjacent subbasin) partners, as part of plan deliberations.

4.2.7. GSP Coordinators Planning Forum

A planning forum for subbasin GSP coordinators should be established to further inform a coordination strategy. This forum would include agency representatives as well as the consultant teams and be used for the sole purpose of coordination and mutual support. It is anticipated that this body might meet on a quarterly or as needed basis. This forum would also provide a central point of contact for adjacent subbasin coordinators.

4.2.8. Environmental Community

As noted in the SA, this community will be interested in a GSP features. The focus of messaging for this group being on how the GSP(s) development will contribute to a sustainable regional water portfolio. Special effort should be made to identify specific

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topics of interest. For example, as part of GSP development, a list of groundwater dependent species may be created, or impacts to wetlands may be identified. These types of lists would highlight where input from the environmental community might be needed.

4.2.9. Federal Government

Federal representatives interviewed for the assessment asked to be kept informed of subbasin SGMA activities. These agencies have a direct interest in surface water integration as well as SGMA activities that could impact wetlands restoration efforts or groundwater dependent ecosystems and species.

RISK MANAGEMENT

Risk management is the identification, assessment, and prioritization of risks (defined as *the effect of uncertainty on achieving objectives*) followed by coordinated, efficient and economical strategies and actions to minimize, monitor, and control the probability and/or impact of negative events. Strategies and actions may also be used to avert risk by leveraging strengths and opportunities.

Risks can come from uncertainty in economic factors, threats from project failures (at any phase), regulatory and legal uncertainties, natural causes and disasters (drought, flood, etc.), as well as dissention from adversaries, or events of uncertain or unpredictable circumstances. Several risk management standards have been developed. This analysis utilizes those from the Project Management Institute.

Table 6 outlines standardized risk categories and translates them to outreach risks.

Table 6. Risk Factors

RISK CATEGORY	Outreach RISK FACTORS
Technical, quality, or performance	<ul style="list-style-type: none"> • Realistic performance goals, scope and objectives
Project management	<ul style="list-style-type: none"> • Quality of outreach design • Outreach deployment and change management • Appropriate allocation of time and resources • Adequate support for Outreach in project management plans
Organizational / Internal	<ul style="list-style-type: none"> • Executive Sponsorship • Proper prioritization of efforts • Conflicts with other functions • Distribution of workload between organizational and consultant teams
Historical	<ul style="list-style-type: none"> • Past experiences with similar projects • Organizational relations with stakeholders • Policy and data adequacy • Media and stakeholder fatigue*
External	<ul style="list-style-type: none"> • Legal and regulatory environment • Changing priorities • Risks related to political dynamics

5.1. Technical, quality, or performance

The subbasin is fortunate to have a high level of water knowledge and skilled personnel available to assist with GSP planning. In general, stakeholder expectations for outreach and performance goals, scope and objectives are attainable. The larger concern in this category is properly communicating the scope of the GSP(s) development and the need for extensive coordination and outreach among a number of parties. Communication of SGMA

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requirements for outreach as a planning requirement should be an ongoing consideration and appears to be underestimated in emphasis.

5.2. *Project management*

A number of positive project management factors are present for the GSP(s) development outreach. Project managers view outreach as an important planning element. The outreach design is based on best management practices and industry standards. It is not overly complicated and with technical services support from DWR and other sources, sufficient resources should be available to properly execute it. Procedures and practices are already in place that can be leveraged to achieve communication goals.

The primary concern in this category relates to GSP coordination. This type of outreach will require additional assessment as the individual GSAs will determine their own protocols for representation.

5.3. *Organizational / Internal*

Conflicts with other GSA member functions and/or conflicts with outreach activities by efforts that include the same stakeholders (e.g. Irrigated Lands, IRWM, and CV-Salts) should be monitored.

One additional consideration will be the distribution of workload between GSA, organizational and consultant teams. Clear roles and responsibilities must be defined and continuous interaction in place to ensure successful execution.

The GSP(s) development process will also need identified, high level spokespersons or champions. These individuals should be able to discuss subbasin planning with the media, in discussions with regulators and potentially at professional conferences.

5.4. *External*

The legal and regulatory environment of the GSP(s) development process is complex and evolving. Ongoing issues with surface water deliveries and changing agricultural market conditions are outside of the control of the parties. It will be important for mechanisms to be in place that allow for relatively rapid responses to changing conditions.

5.5. *Historical*

The primary stakeholders in this process generally view interactions and meetings as productive. There is a history of cooperation and a willingness to work together to save costs and achieve better outcomes.

TACTICAL APPROACHES

Following are specific tactical approaches that may be utilized to deliver the activities, messages, and recommendations of the previous chapters. These approaches are based on best communication practices and grounded in the public participation philosophy of the International Association for Public Participation, Public Participation Spectrum as illustrated in **Table 7**.

The Spectrum represents a philosophy that outreach should match the desired level of input from both the stakeholder and the organizational entity.

Table 7. IAP2 Public Participation Spectrum

IAP2 Public Participation Spectrum

Developed by the International Association for Public Participation

INCREASING LEVEL OF PUBLIC IMPACT				
INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
Public Participation Goal:	Public Participation Goal:	Public Participation Goal:	Public Participation Goal:	Public Participation Goal:
To provide the public with balanced and objective information to assist them in understanding the problems, alternatives and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public issues and concerns are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision-making in the hands of the public.
Promise to the Public:	Promise to the Public:	Promise to the Public:	Promise to the Public:	Promise to the Public:
We will keep You informed.	We will keep you informed, listen to and acknowledge concerns and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and issues are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for direct advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.
Example Tools:	Example Tools:	Example Tools:	Example Tools:	Example Tools:
<ul style="list-style-type: none"> ● Fact sheets ● Web Sites ● Open houses 	<ul style="list-style-type: none"> ● Public comment ● Focus groups ● Surveys ● Public meetings 	<ul style="list-style-type: none"> ● Workshops ● Deliberate polling 	<ul style="list-style-type: none"> ● Citizen Advisory Committees ● Consensus-building ● Participatory decision-making 	<ul style="list-style-type: none"> ● Citizen juries ● Ballots ● Delegated decisions

Based on the assessment findings for the GSP(s) development, most stakeholders would simply like to be INFORMED unless there is a potential for significant changes that may include that stakeholder. Tactics for this group will include fact sheets, websites, open houses, briefings, and informational items placed in publications they already read.

The next largest group of stakeholders, primarily groundwater pumpers and disadvantaged communities, wish to be CONSULTED. This group will have access to all the materials

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prepared as part of the informational phase. In addition they should be invited to provide comments on written materials and planning concepts and participate in focused workshops and/or briefings. They should also be invited to attend larger public meetings.

The development of some GSP features may require a higher degree of INVOLVEMENT. This would focus on engagement of a subset of stakeholders that may experience significant impacts associated with SGMA.

COLLABORATION opportunities have also been identified; however, they are of a different character than defined in the Spectrum. Collaboration in this GSP(s) development process will focus on working with partners that have mutual goals to achieve those goals together. This will more resemble a partnership than a public engagement activity.

6.1. *Communications Coordination.*

Each GSA is required to perform legally mandated outreach activities and the GSP submission guidelines require a minimum level of engagement.

The subbasin GSAs should coordinate outreach activities even if there is a decision to move forward with multiple GSPs. In addition to efficiency and cost savings (the GSAs can share resources) this strategy will allow for consistency in messaging and reduce confusion for stakeholders that may not know what GSA jurisdiction they are in, and/or are in multiple GSA jurisdictions. Following are suggested options for communications coordination.

1. Website
2. Meeting calendar
3. Branded informational Flyers, Templates, PowerPoint Presentations, etc.
4. Periodic newsletter
5. GSP related mailing lists
6. Descriptions of interested parties
7. Issues and interest statements for legally mandatory interested parties
8. Public workshops
9. Message calendar
10. Press releases and guest editorials
11. Speakers Bureau
12. Existing group venues
13. Outreach documentation

6.2. *Tactics*

6.2.1. Website

As part of the communications plan development, a list of website concepts and draft website content was prepared. The following describes the proposed approach:



- a. Centralized – Establish a centralized website for the entire subbasin.
- b. Individual GSAs – Posting of material to a website is part of the SGMA requirements. Those GSAs with their own webpages can link to and from the centralized site if they wish to provide their own customized information. For those GSAs without their own website, courtesy pages would be provided as an added feature of the main site. The courtesy pages would all use a single template with the same information to facilitate easy management and updates. Individual GSAs choosing to take advantage of the courtesy pages would be responsible for ensuring that information is current. The page should include a “Last Updated” box to indicate the timeliness of the information.
- c. **Basic features** – A basic website framework has already been developed along with introductory information that has prepopulated each page.

Figure 10 illustrates the basic content of the site and includes:

1. Background information
2. Information about getting involved, including meeting information
3. A separate link for Spanish Language materials
4. Frequently asked questions
5. Links to GSAs
6. Contact information

Should a GSA decide to not participate in the Central website, a similar structure could be utilized.

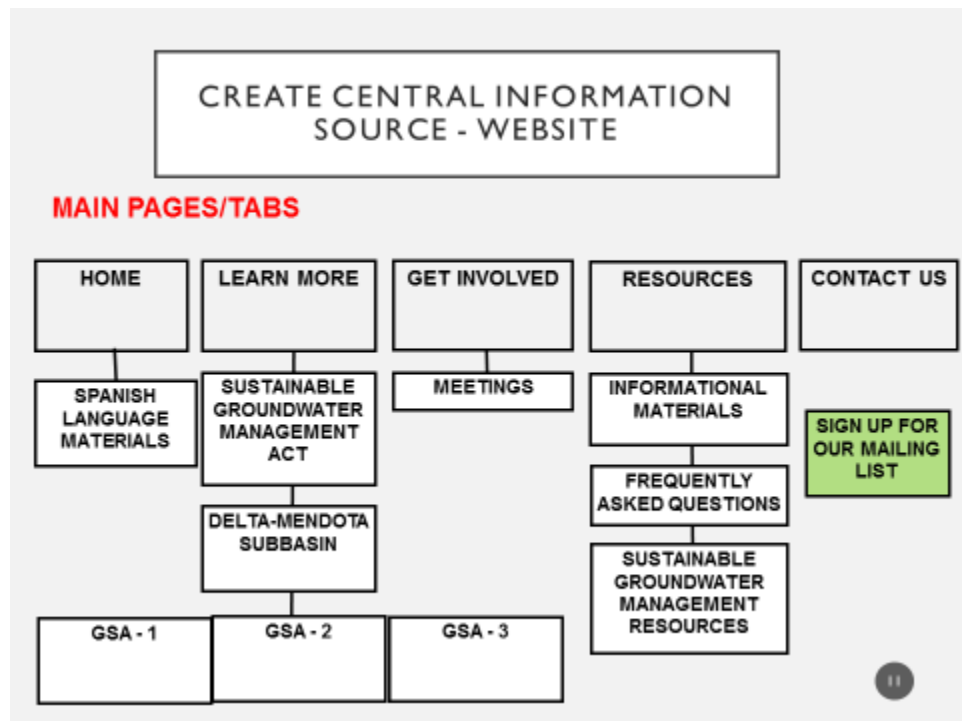


Figure 10. Website Structure

6.2.2. Meeting Calendar

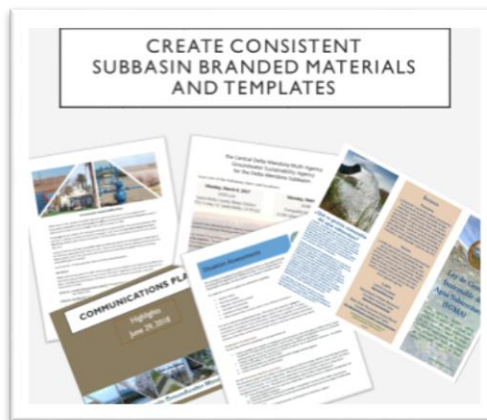
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A shared meeting calendar will provide a one-stop shop for stakeholders and assist in preventing meeting conflicts while creating more potential for shared activities. This calendar should include current and scheduled meetings and workshops as well as serve as the repository for agendas and meeting notes, along with copies of meeting materials and presentation.

An integrated project calendar should also be developed that links planning project milestones with communications milestones.

6.2.3. Branded Informational Flyers, Templates, PowerPoint Presentations, etc.

Subbasin level materials should have a single look and feel to create on-going consistency and visual recognition by stakeholders. Use of templates, shared presentations and flyers will create efficiencies and reinforce messaging. This communications plan incorporates some of this type of branding.



6.2.4. Periodic Newsletter

The need for regular communications cannot be overstated. One option is production of a periodic newsletter. Given the relatively short GSP(s) development process timeframe and the GSP development requirements for periodic outreach to identified stakeholders, a quarterly schedule would be realistic and achieve compliance with SGMA requirements for periodic updates to stakeholders. The newsletter should be designed so that individual GSAs can add tailored information if they choose to. For Portable Document Format (PDF) versions of the newsletter, a GSA could add a simple one or two page insert and the edition could be used as a handout or mailer. For a professional looking, email version of the newsletter, we recommend free or low cost services such as Mail Chimp or Constant Comment, which can be integrated with mailing lists.

Adding GSA specific information to an email newsletter can be done with web-links in the email to the very same PDF page prepared for the hardcopy mailer. An alternative is emailing the entire newsletter PDF as an attachment (although this format is less likely to be read than the mailer services).

6.2.5. GSP related mailing lists

Each GSA is required to develop notification lists. A central list may be utilized for GSP(s) related notifications.

6.2.6. Descriptions of Interested Parties

Each GSA is required to develop descriptions of interested parties. These lists should be updated and merged for use in the GSP(s) submittal(s). These can also be provided as background information on the website as part of constructing an administrative record. The SA in Chapter 4 provides an initial start for this documentation.

6.2.7. Issues and Interest Statements for Legally Mandatory Interested Parties

A GSP submission must include a statement of interests for listed stakeholders. As suggested earlier, this can also be included on the website.

6.2.8. Coordinated Public Workshops

SGMA requires a series of public hearings and some public workshops. Such workshops should be coordinated with other subbasin entities.

During the GSA formation process the County of Merced and a forming GSA body conducted a joint workshop to explain more about SGMA and the proposed GSA formation. Distribution of meeting flyers and notices was done concurrently, and DWR attended the event to answer questions. The GSP development process will offer similar opportunities, not only within the subbasin, but with adjacent subbasins.

6.2.9. Message Calendar

Basic messages should be associated with the planning schedule and each stage of GSP(s) development and serve as the theme for the communications materials being generated. For example, during the GSA formation period there was a need to communicate the basics of SGMA and groundwater management. During the GSP(s) initiation phase messages should focus on the basics of groundwater sustainability and the current state of the subbasin. As the GSP(s) begins to take form the specifics of the GSP(s) and what it means for each stakeholder would be the focus.



6.2.10. Press Releases and Guest Editorials

At some point in the GSP development and implementation process, it is likely that stakeholders will be asked to make changes and/or financially support a sustainability effort. It will be more productive for the GSAs and their GSP collaboration partners to frame discussions about these changes than to have others, perhaps with less knowledge, do so on their behalf. For that reason there is a need for press releases and/or guest editorials to offer the media and stakeholders accurate information offered in the context of SGMA. This type of outreach should be closely coordinated as consistency in messages is critical to stakeholder acceptance.

Chapter 6

6.2.11. Speakers Bureau

Efforts should be made to conduct outreach at events and meetings that already occur (e.g. Farm Bureau meetings, Rotary Club, etc.). A list of knowledgeable presenters should be developed in the event an organization or other entity would like a presentation. Speakers Bureau engagements should be recorded on the planning project meeting calendar.

6.2.12. Existing Group Venues

Fully leverage the activities of existing groups.

- Maintain a roster of existing groups and typical meeting schedules with a nexus to GSP(s) development. Add the dates to the messaging calendar.
- The list of audiences, messages and existing groups should be referenced when there is a need to deploy information.
- Conduct informal outreach with the leaders of such groups to determine the best way to interact.
- Determine what communications channels these groups are using and equally leverage these, for example by placement of articles in newsletters.

6.2.13. Outreach Documentation

A central point of contact should be identified on the website and an outreach statistics inventory should be established that identifies dates, times, audiences and attendance. This information will be also be useful in conducting follow up with stakeholders as well as documenting outreach as part of GSP submittal guidelines.

6.3. *Procedural and Legally Mandated Outreach*

A discussion of SGMA outreach requirements was provided in Chapter 1 and a full list of requirements is contained in Appendix 1. One major feature of the requirements is a submission to DWR of the opportunities that interested parties will be given to participate in the GSP deliberations. The Situation Assessment provides an initial description that can be added to with additional outreach.

Following are the Required Interested Parties for the purpose of mandated outreach:

Table 9 provides a list of the mandated outreach and the timeframe in which is required.

Table 8. Mandated Outreach

Timeframe	Item
Prior to initiating plan development	1. Statement of how interested parties may contact the Agency and participate in development and implementation of the plan submitted to DWR.

Timeframe	Item
	2. Web posting of same information.
Prior to plan development	<ol style="list-style-type: none"> 1. Must establish and maintain an interested persons list. 2. Must prepare a written statement describing the manner in which interested parties may participate in GSP development and implementation. Statement must be provided to: <ol style="list-style-type: none"> a. Legislative body of any city and/or county within the geographic area of the plan b. Public Utilities Commission if the geographic area includes a regulated public water system regulated by that Commission c. DWR d. Interested parties (see Section 10927) e. The public
Prior to and with GSP submission	<ol style="list-style-type: none"> 1. Statements of issues and interests of beneficial users of basin groundwater, including types of parties representing the interests and consultation process 2. Lists of public meetings 3. Inventory of comments and summary of responses 4. Communication section in plan that includes: <ul style="list-style-type: none"> • Agency decision making process • ID of public engagement opportunities and response process • Description of process for inclusion • Method for public information related to progress in implementing the plan (status, projects, actions)
90 days prior to GSP Adoption Hearing	1. Prior to Public Hearing for adoption or amendment of the GSP, the GSP entities must notify cities and/or counties of geographic area 90 days in advance.
90 days or less prior to GSP Adoption Hearing	<ol style="list-style-type: none"> 2. Prior to Public Hearing for adoption or amendment of the GSP, the GSP entities must: <ol style="list-style-type: none"> a. Consider and review comments b. Conduct consultation within 30 days of receipt with cities or counties so requesting
GSP Adoption or Amendment	1. GSP must be adopted or amended at Public Hearing.
60 days after plan submission	1. 60-day comment period for plans under submission to DWR. Comments will be used to evaluate the submission.
Prior to adoption of fees	<ol style="list-style-type: none"> 1. Public meeting required prior to adoption of, or increase to fees. Oral or written presentations may be made as part of the meeting. 2. Public notice shall include: <ol style="list-style-type: none"> a. Time and place of meeting b. General explanation of matter to be considered

Timeframe	Item
	<ul style="list-style-type: none"> c. Statement of availability for data required to initiate or amend such fees d. Public posting on Agency Website and provision by mail to interested parties of supporting data (at least 20 days in advance) 3. Mailing lists for interested parties are valid for 1 year from date of request and may be renewed by written request of the parties on or before April 1 of each year. 4. Includes procedural requirements per Government Code, Section 6066.
Prior to conducting a fee adoption hearing.	<ul style="list-style-type: none"> 1. Must publish notices in a newspaper of general circulation as prescribed. 2. Publication shall be once a week for two successive weeks. Two publications in a newspaper published once a week or oftener, with at least five days intervening between the respective publication dates not counting such publication dates, are sufficient. 3. The period of notice begins the first day of publication and terminates at the end of the fourteenth day, (which includes the first day.)

6.4. Items for Future Consideration

This GSP(s) Coms Plan outlines an outreach effort based on project and stakeholder needs and preferences. This document has been prepared as a working draft living document and should be updated as new information and the GSP(s) development process needs are developed.

MEASUREMENTS & EVALUATION

A guiding principle for evaluation and measurement of the Coms Plan's success is to provide regular, unbiased reporting of progress toward achieving goals. Success may be evaluated in several ways, including process measures, outcome measures, and an annual evaluation of accomplishments. Optional evaluation measures are described below.

As part of each outreach effort debrief the following process and outcome measures will be discussed and recorded in a check sheet. The check sheets will be prepared with the goal of continuous improvement rather than criticisms.

7.2. Process Measures

Process measures track progress toward meeting the goals of the Coms Plan. These include:

- Level of attendance at outreach meetings
- Shared understanding of the overarching aims, activities, and opportunities presented by different planning approaches and project activities
- Productive dialogue among participants at meetings and events
- Sense of authentic engagement; people understand why they have been asked to participate, and feel that they can contribute meaningfully
- Timely and accurate public reporting of planning milestones
- Feedback from Coordinating Body and GSA members, regulators, stakeholders, and interested parties about the quality and availability of information materials
- Level of stakeholder interest in the GSP(s) development process information

7.3. Outcome Measures

Outcome measures track the level of success of the Coms Plan in meeting its overall goals. Some outcome measures considered for the GSP(s) development process include the following:

- Consistent participation by key stakeholders and interested parties in essential activities. Participants should have no difficulty locating the meetings, and should be informed as to when and where they will be held.
- Response from meeting participants that the engagement methods provided for a fair and balanced exchange of information.
- Feedback from interested parties that they understand how their input is used, where to track data, and what results to expect.
- The project receives quality media coverage that is accurate, complete and fair.

7.4. Mid-cycle Evaluation of Accomplishments

A mid-cycle evaluation provides an opportunity to examine the current effectiveness of the Coms Plan and provides a chance to reevaluate strategies to meet the GSP(s) development process objectives. The evaluation tasks may include:

- Preparation of an executive-level summary detailing high-level initiatives and accomplishments of the previous cycle. This evaluation should also include positive news, best practices, goals and objectives, notable changes, timelines, and priorities.
- Identifying gaps and areas for improvement.
- Highlighting how gaps and areas for improvement in the cycle has been addressed.
- Outlining process and outcome measures and their current results.

ROLES AND RESPONSIBILITIES

The GSP(s) development Coms Plan outlines numerous strategies, activities and tactics. While none are highly complex, there is a requirement for coordination and clarity regarding who will be responsible for executing the tasks.

After the planning team evaluates the timelines and priorities for each of the communications activities a recommended next step is completion of a Responsible, Accountable, Consulted, and Informed (RACI) Chart. This Chart, as displayed in **Table 10**, outlines key tasks and the assignment of roles and responsibilities for accomplishing them.

Table 9. Sample RACI Chart

Activity TYPE	SPECIFIC PRODUCT	RESPONSIBLE	ACCOUNTABLE	CONSULTED	INFORMED
Internal Staff Communications, information materials for/briefings	Draft	Person A	Person E	Person I	
	Final Draft	Person A	Person E	Person I	Project Team
List Serves, mailing lists	Customer Contacts	Person B - Person A	Person E	Person I	Project Team
	Concurrent jurisdictions	Lisa Beutler/MWH	Person G	Person I	Project Team
	Other - identified stakeholders	Person A	Person G	Person I	Project Team
Web Content and Maintenance	Draft Content and Content Refresh	Lisa Beutler/MWH/	Person G	Person H	Project Team
	Site Administration	Person A	Person G	Person H	
General public Intro Packets, Fact Sheets and Brochures	Draft	Person D	Person E	Person I- Subject Matter Experts	Person J
	Revised Draft	Person D	Person E	Person I- Subject Matter Experts	Person J
	Final Draft	Person D	Person E	Person I- Subject Matter Experts	Project Team
Newsletter Content	Draft	Lisa Beutler/MWH	Person E	Person I- Subject Matter Experts	Person J
	Revised Draft	Person D	Person E	Person I- Subject Matter Experts	Person J
	Final Draft	Person D	Person E	Person I- Subject Matter Experts	Project Team

Responsible

Those who do the work to achieve the task. There is at least one person with a role of *responsible*, although others can be delegated to assist in the work required.

Accountable (also approver or final approving authority)

This is the person ultimately answerable for the correct and thorough completion of the deliverable or task, and the one who delegates the work to those responsible. There **may only** be only one *accountable* specified for each task or deliverable.

Consulted

Those whose opinions are sought, typically subject matter experts were people that are impacted by the activity; and with whom there is two-way communication.

Informed

Those who are kept up-to-date on progress, typically on the launch and completion of the task or deliverable. This is one way communication.

Role distinction

There is a distinction between a role and the individual assigned the task. Role is a descriptor of an associated set of tasks that could be performed by just one or many people.

In the case of the RACI Chart, the team may list as many people as is logical except for the Accountable role.

Scope of Work

Completion of the RACI Chart will also support development of any future scopes of work for consultant provided communication and outreach services.

Appendix

LIST OF APPENDICES

Appendix 1-Public Outreach Requirements under SGMA

Appendix 2-Communications Governance

Appendix 1. Public Outreach Requirements under SGMA

GSP Regulations

CODE	PUBLIC OUTREACH REQUIREMENT
<p>§ 353.6. Initial Notification</p> <p>(a) Each Agency shall notify the Department, in writing, prior to initiating development of a Plan. The notification shall provide general information about the Agency’s process for developing the Plan, including the manner in which interested parties may contact the Agency and participate in the development and implementation of the Plan. The Agency shall make the information publicly available by posting relevant information on the Agency’s website.</p>	<ol style="list-style-type: none"> 1. Statement of how interested parties may contact the Agency and participate in development and implementation of the plan submitted to DWR. 2. Web posting of same information. <p>Timing: <i>Prior to initiating development of a plan.</i></p>
<p>§ 353.8. Comments</p> <p>(a) Any person may provide comments to the Department regarding a proposed or adopted Plan.</p> <p>(b) Pursuant to Water Code Section 10733.4, the Department shall establish a comment period of no less than 60 days for an adopted Plan that has been accepted by the Department for evaluation pursuant to Section 355.2.</p> <p>(c) In addition to the comment period required by Water Code Section 10733.4, the Department shall accept comments on an Agency’s decision to develop a Plan as described in Section 353.6, including comments on elements of a proposed Plan under consideration by the Agency.</p>	<ol style="list-style-type: none"> 1. 60-day comment period for plans under submission to DWR. Comments will be used to evaluate the submission. 2. Parties may also comment on a GSA’s (or GSAs’) statements submitted under section 353.6 <p>Timing: For GSP Submittal - <i>60 days after submission to DWR</i></p>
<p>§ 354.10. Notice and Communication</p> <p>Each Plan shall include a summary of information relating to notification and communication by the Agency with other agencies and interested parties including the following:</p> <p>(a) A description of the beneficial uses and users of groundwater in the basin, including the land uses and property interests potentially affected by the use of groundwater in the basin, the types of parties representing those interests, and the nature of consultation with those parties.</p> <p>(b) A list of public meetings at which the Plan was discussed or considered by the Agency.</p> <p>(c) Comments regarding the Plan received by the Agency and a summary of any responses by the Agency.</p> <p>(d) A communication section of the Plan that includes the following:</p> <ol style="list-style-type: none"> (1) An explanation of the Agency’s decision-making process. (2) Identification of opportunities for public engagement and a discussion of how public input and response will be used. 	<ol style="list-style-type: none"> 5. Statements of issues and interests of beneficial users of basin groundwater, including types of parties representing the interests and consultation process 6. Lists of public meetings 7. Inventory of comments and summary of responses 8. Communication section in plan that includes: <ul style="list-style-type: none"> • Agency decision making process • ID of public engagement opportunities and response process • Description of process for inclusion • Method for public information related to progress in implementing the plan (status, projects, actions) <p>Timing: For GSP Submittal – <i>with plan</i> For GSP Development – <i>continuous.</i> <i>[Note: activities should be included</i></p>