



MEMORANDUM

TO: SLDMWA Board of Directors, Alternates

FROM: John Brodie, Water Resource Programs Manager
Joe McGahan, Regional Drainage/Westside Watershed Coalition Coordinator

DATE: July 14, 2022

RE: Activity Agreements – Staff Report for June 2022

This memorandum serves as the Staff Report for June 2022 regarding specified¹ Water Authority activities not separately addressed on the Board meeting agenda.

1. Integrated Regional Water Management (IRWM) Activity Summary

General Westside-San Joaquin Integrated Regional Water Management Plan (IRWMP)

The IRWM Technical Advisory Committee (TAC) and Activity Agreement Members each held meetings in June to discuss project selection to apply for Proposition 1 Round 2 Grants. Projects in the Westside San Joaquin (WSJ) Region are eligible for \$955,500 in funding, based on a prior agreement. Projects in TKFA must compete against all others from the funding area, including those from outside the WSJ region. The application deadline is August 18, 2022.

Staff is collecting information about the work of irrigation and water districts in the Westside San Joaquin Region on how they are engaging with Disadvantaged Communities (DACs). Leveraging established relationships and building off of work already accomplished will guide the development of tailored funding matrices will help DACs be ready for future grant and other funding opportunities, or take advantage of technical assistance that is available.

Staff continues to take part in meetings and webinars including the IRWM Roundtable of Regions (ROR) and the IRWM ROR Disadvantaged Communities and Tribal Working Group.

2. Sustainable Groundwater Management Activity (SGMA) Activity Summary

Coordinated Activities

The Coordination Committee concluded revisions on the six Groundwater Sustainability Plans (GSPs) for the Delta-Mendota Subbasin in response to DWRs determination that the plans were “incomplete.” In its letter, the Department detailed four “deficiencies” and identified

¹ For the sake of completeness, this includes those Activity Agreements that have been approved by the Board of Directors, but not yet signed by all interested members and/or participants (i.e., the Los Vaqueros Expansion Project Activity Agreement, the Exchange Contractors 2019-2023 Transfer Program Activity Agreement, and the Westside-San Joaquin Integrated Regional Water Management Activity Agreement).

recommended corrective actions. The Committee accepted the revisions that were made and recommended all 23 GSAs in the Subbasin adopt the amended GSP. The GSAs are now in the process of formally adopting the amended plans so they can be submitted to DWR by the July 20, 2022 deadline.

Spring Groundwater Level Elevation data was submitted to DWR prior to the July 1, 2022 deadline. GSAs can now begin collecting water quality samples from Representative Monitoring Network sites and submitting the information to the subbasin Data Management System. The deadline to collect water quality monitoring samples is the end of August. GSAs have until September 30, 2022 to upload the data.

General SGMA Activities

DWR will finalize an agreement with GSP groups in the subbasin on a \$7.6 million dollar SGMA Implementation Grant awarded to the Delta-Mendota Subbasin. The funds will be used for projects and activities including water recharge and enhancement, installation of monitoring equipment and sites, studies, and completing revisions to "incomplete" GSPs and the 5 year GSP updates. Del Puerto Water District served as the lead applicant on behalf of the Subbasin's 23 GSAs.

All deliverables and the final invoices were submitted to DWR for the Proposition 1/Proposition 68 SGMA Implementation Grant. This funding helped to produce the Subbasin's six GSPs, a Well Census and Inventory for the subbasin and a Subsidence Characterization and Project Feasibility Study.

3. Drainage Activity Summary

Grassland Basin Drainage Management Steering Committee Activity Summary

- *Mud Slough Restoration Project*
Review issues with CDFW. Follow up discussions to be held.
- *Grassland Water District Monitoring Wells*
A total of 10 observation wells are planned to be installed to monitor groundwater levels and quality within the San Joaquin River Improvement Project and in a portion of Grassland Water District to the north. To date, five of the observation wells have been installed. The remaining five were delayed due to permitting issues from Merced County and landowner issues, which are in the process of being addressed.
- *Compliance Monitoring*
Work is continuing to comply with the monitoring requirement of the 2019 Revised WDRs and with the December 2019 Use Agreement. This monitoring includes particulate sediment and fish collection and analysis to continue to analyze possible impacts of very infrequent discharge from the Grassland Bypass Project to Mud Slough and the San Joaquin River.

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- *Other ongoing activities*

Continue to review GBD invoices, prepare annual monitoring reports, support for ongoing litigation and data management and management of the Third Party Group for the Grassland Drainage Area Coalition to implement the Irrigated Lands Regulatory Program. Work includes participation in activities for groundwater protection values.

San Joaquin Valley Drainage Authority Activity Summary

- *General*

Continue management of the Westside San Joaquin River Watershed Coalition to comply with the Irrigated Lands Regulatory Program. Distribute by mail paperwork requirements for 2021 reporting year. Follow up calls and emails were answered to assist farmers in completing their paperwork requirements. Manage field monitoring program and provide update of the management plan to the Regional Board. Review invoices from consultants and prepare letters to admin staff. Continue to update membership database. Prepare for annual grower meetings including district meetings. Enter farmer evaluation and nitrogen summary reports into coalition database. Meet with members to answer program questions. Work with legal team to develop revised conflict of interest guidelines.

- *Groundwater Protection Formula, Values and Targets*

Coalitions are developing a methodology to establish nitrogen loading values and targets as required by the WDRs. The coalitions have calculated current values by township (36 square miles) and will propose interim targets and longer-term final targets for each township. If a township does not meet the approved GWP Targets, Coalitions will need to amend their Groundwater Quality Management Plan to include new management practices designed to meet the township's GWP Target. If a Coalition has elected to comply with the state's Nitrogen Permitting Strategy through the Management Zone alternative, the Coalition will have significantly more time to meet final GWP Targets. Reviewing drafts that are being developed for submittal in July.

- *Management Zones*

The Central Valley Basin Plan's Nitrate Permitting Strategy divided the Central Valley into Priority 1, Priority 2 and non-Prioritized basins. The Westside Coalition is in Priority 2. Priority 1 basins have developed and begun to implement their nitrate programs. The Regional Board is expected to issue notices to comply to Priority 2 basins in early 2023. The Westside San Joaquin River Watershed Coalition is in a Priority 2 basin and therefore is expected to receive a Notice to Comply from the Regional Board in 2023. The Westside Coalition is working to develop a plan to help form a Management Zone to comply with the requirements. The Management Zone will incorporate all dischargers of nitrate to groundwater, including municipal wastewater plants, dairies and industrial dischargers. The Management Zone will need to identify domestic wells that are high in nitrate and develop and plan to provide alternative water.

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San Luis & Delta-Mendota Water Authority

Procurement Activity Report

From June 2, 2022 to July 6, 2022

Date Executed	Contract Title	Vendor or Service Provider	Contract Amount	Contract Solicitation Type	Contract Type	Funding Source	Notes
NOTE: NO CONTRACTS WERE AWARDED UNDER THE AUTHORITY'S INFORMAL BIDDING, FORMAL BIDDING, OR SINGLE-SOURCE PROCEDURES DURING THIS REPORT PERIOD							

CONTRACT CHANGE ORDER NOTIFICATIONS:

Date Executed	Contract Title	Vendor or Service Provider	Change Order Amount	Original Contract Amount	% Change	Justification
NOTE: NO CONTRACT CHANGE ORDERS WERE ISSUED DURING THIS REPORT PERIOD						

This Procurement Activity Report is intended to satisfy the requirements in the San Luis & Delta-Mendota Water Authority's Consolidated Procurement Policy that the Board be notified of all contracts awarded under informal and formal bidding procedures and single-source procedures, as well as certain change orders, promptly following award.

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VIII.A

**Westside-San Joaquin IRWM Region
Activity Agreement Members Meeting**

Monday July 18, 2022 2:00 PM

Join Zoom Meeting at the Link Below

<https://us02web.zoom.us/j/87892986696?pwd=Unc4SWhyeWxyNmpnbGJvdWF0M0ptUT09>

Meeting ID: 878 9298 6696

Passcode: 913414

One tap mobile

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AGENDA

1. Introductions
2. IRWM Proposition 1 Round 2 Funding Opportunity
 - a. DWR input on Del Puerto Canyon Reservoir
 - b. Member Confirmation of Project Selection
 - c. Discuss Cost Share Agreement for Application Preparation and Grant Administration Post-award.
3. Member Input on Draft IRWM Annual Report
4. Next Steps
5. Adjournment

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Decision Support Tools in Proposition 1 IRWM Implementation



Decision support tools are the only non-implementation project type eligible to receive Proposition 1 Implementation funding. A decision support tool project should collect data and/or generate a model to support future water management decisions. Proposals for decision support tool projects should include a clear description of how data will be collected and used for future projects or the development of future programs (i.e., who will use the collected data, how the data will be used, and what decisions will be derived).

As defined in Proposition 1, decision support tools:

- Support the integration of multiple jurisdictions, including, but not limited to, water supply, flood control, land use, and sanitation.
- Evaluate the benefits and costs of multi-benefit stormwater projects.
- Model regional water management strategies to account for climate change and other changes in regional demand and supply projections.

Examples of Activities to Develop Decision Support Tool Projects

- Decision Support Tools that use community outreach and engagement activities (e.g., trainings, workshops, or site visits) to generate data (such as survey responses or feedback). Examples of data that can be collected to incorporate into models includes community water needs; locations of disadvantaged, climate-vulnerable, or Tribal communities; data on water usage/demand; etc.
- Climate vulnerability analysis for decision support including identifying, mapping, and engaging vulnerable populations.
- Generating maps for decision support. Data that can be used in mapping tools include water demand and supply; water affordability; locations of drought-vulnerable areas; and locations of disadvantaged, climate-vulnerable, or Tribal communities.
- Economic cost/benefit analysis. Cost/benefit analysis can also incorporate climate change data and supply/demand data.
- Planning/project development activities can generate data that would be useful in climate change or supply/demand models. Information on community water needs, climate vulnerability, and demographics that are collected in the process of planning/project development may be useful for models.

Examples of Decision Support Tool Projects funded in Proposition 1 Round 1

Project Description	Description of Decision Informed by Project
<p>The project will create water budgets based on efficiency at the customer and retail water agency scale through the collection of aerial imagery, weather data, and other information.</p>	<p>Information collected as part of this project will help retail water agencies identify which customers are inefficient and target conservation programs, such as turf removal rebate programs, to those inefficient customers.</p>
<p>The project will sample from local water purveyors and individual well owners to identify likely sources of point and non-point contamination of local drinking water systems.</p>	<p>Information on sources of drinking water contamination will be used to inform future decisions regarding local water systems.</p>
<p>The project will conduct two research studies: 1) an indoor water use and fixture saturation study to assess the ongoing need for rebate or direct installation programs and 2) and outdoor study that focuses on landscape imagery analysis, including the creation of landscape water budgets, with the purpose of assessing customer landscape water use.</p>	<p>The results of the research studies will inform and influence current and future customer indoor and outdoor efficiency programs and related policy and funding decisions.</p>
<p>The project will collect data to be used in a tool that will assess the vulnerability of well locations to climate change conditions and contaminants. The tool will calculate a probability that a well will go dry in future drought scenarios or be contaminated.</p>	<p>The results will be used to guide selection of locations for future wells.</p>

VIII.B

Westside San Joaquin River Watershed Coalition
2021 Paperwork Status Update for Del Puerto WD as of 7/8/2022

<u>Survey Type</u>	<u>recvd</u>	<u>total</u>	<u>pct recvd</u>
INMPSR	104	116	90%

IDNo	Member Name	FE Req?	INMPSR Req?	2021 INMPSR Status	2021 paperwork req. met?
25006A	R.C. Capital Investments, LLC	no	yes	not recvd	INMPSR missing
25016A	Hamlow Farms	no	yes	not recvd	INMPSR missing
25040A	Gonzalez Farms	no	yes	not recvd	INMPSR missing
25055A	Singh, Rajinder et ux.	no	yes	not recvd	INMPSR missing
25073A	JKB Development, Inc.	no	yes	not recvd	INMPSR missing
25079A	Longhorn Enterprises	no	yes	not recvd	INMPSR missing
25117A	JT Farms #2	no	yes	not recvd	INMPSR missing
25122A	L & L Investments, LLC	no	yes	not recvd	INMPSR missing
25144A	Sardar Ranch	no	yes	not recvd	INMPSR missing
25158A	Ace Orchards, LLC	no	yes	not recvd	INMPSR missing
25160A	Garlic City Properties, LLC	no	yes	not recvd	INMPSR missing
25165A	T.C.A Properties, Inc.	no	yes	not recvd	INMPSR missing

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VIII C.

Anthea Hansen

From: Ramirez, Adriel <Adriel.Ramirez@countyofmerced.com>
Sent: Wednesday, July 6, 2022 2:42 PM
To: Ramirez, Adriel
Subject: Merced County Well Permit Transition Update
Attachments: Groundwater Sustainability Agency GSP Consistency Determination Form.pdf

Good Afternoon, Merced County GSAs:

The purpose of this email is to provide an update regarding the consistency determination letters provided by the GSAs to the Merced County Division of Environmental Health (MCDEH) for non-Domestic De Minimis wells that are located within the jurisdiction of a GSA. Our office has determined, over the course of the past couple months, that it would be beneficial to both the County and to the local GSAs to have a single template form that the GSAs could utilize to document compliance with the State of California Executive Order N-7-22 and the Merced County Groundwater Mining and Export Ordinance. Our office appreciates your efforts in crafting consistency determination letters for each of your respective GSAs so quickly as it ensured that our County's constituents were able to have access to water during the transition. We hope that this form will expedite this process for you and look forward to obtaining any feedback you may have on the form. Please note that effective immediately this form represents the sole format that the MCDEH has approved for a GSA's use in providing its determination of whether a well proposal is consistent with an applicable Groundwater Sustainability Plan. Our County IT department is currently working on uploading this form to our website at the following link: <https://www.countyofmerced.com/1636/Applications-Forms-Permits>.

I would also like to create a list that would be posted on MCDEH's website that contains the point of contact for every local GSA that is responsible for issuing a consistency determination for a well proposal. Please provide me with an email and phone number of the contact person you would like listed on this form.

We will continue to provide updates, and staff are available to help answer any questions you may have regarding this process.

Sincerely,

Adriel Ramirez, REHS
Environmental Health Specialist
 Merced County Community and Economic Development Department
 2222 M St., Merced, CA 95340
 phone 209-381-1096 | fax 209-384-1593

Our office will be closed on the following days in 2022: Sep 5, Oct 10, Nov 11, Nov 24, Nov 25, and Dec. 26

If you have an Environmental Health emergency and our office is closed, please call the CALFIRE-Mariposa Dispatch office at (209) 966-3621.

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MEETING OF THE BOARD OF DIRECTORS OF THE DM-II GSA

Division I – WILLIAM KOSTER (President) Division II - DANIEL BAYS (Vice President) Division III - PETER LUCICH Division IV – ZACH MARING Division V - KYLE PEREZ Division VI – JAROD LARA Division VII - JIM JASPER

WHEN

Friday, July 15, 2022 1:00 PM

WHERE

DISTRICT OFFICE - 17840 Ward Ave, Patterson, CA

• PROPOSED AGENDA •

- I. CALL TO ORDER
- II. OPPORTUNITY FOR PUBLIC COMMENT
Members of the general public may address the Board. Please observe a time limit of two minutes.
- III. ADDITIONS/REVISIONS TO THE AGENDA
The Agenda as posted may only be revised under certain limiting circumstances.
- IV. RESOLUTION AUTHORIZING ADOPTION OF THE AMENDED NORTHERN & CENTRAL DELTA-MENDOTA GROUNDWATER SUSTAINABILITY PLAN
- V. CLOSED SESSION
- VI. Items to Discuss Pursuant to Government Code 54954.2
- VII. ADJOURNMENT

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VIII C.

RESOLUTION ADOPTING THE AMENDED NORTHERN & CENTRAL DELTA-MENDOTA REGION GROUNDWATER SUSTAINABILITY PLAN

A. **WHEREAS**, in August 2014, the California Legislature passed, and in September 2014 the Governor signed, legislation creating the Sustainable Groundwater Management Act (“SGMA”) “to provide local groundwater sustainability agencies with the authority and technical and financial assistance necessary to sustainably manage groundwater” (Wat. Code, § 10720, (d)); and

B. **WHEREAS**, SGMA requires sustainable management through the development of groundwater sustainability plans (“GSPs”), which can be a single plan developed by one or more groundwater sustainability agencies (“GSAs”) or multiple coordinated plans within a basin or subbasin (Wat. Code, § 10727); and

C. **WHEREAS**, SGMA requires a GSP to be developed and implemented to manage groundwater in all basins designated by the Department of Water Resources (“DWR”) as medium or high priority, including the Delta-Mendota Subbasin (basin number 5-22.07); and

D. **WHEREAS**, the DM-II GSA was formed to be an exclusive GSA for a portion of the Delta-Mendota Subbasin, and is composed of the following member agencies: Del Puerto Water District, a California water district and Oak Flat Water District, a California water district (individually, a “Party” and in the plural or collectively, the “Parties”); and

E. **WHEREAS**, pursuant to its Memorandum of Agreement entered into by the Parties on April 19, 2017, the DM-II GSA is governed by the respective Board of Directors of the Parties (the “Board of Directors”); and

F. **WHEREAS**, the DM-II GSA has the authority to draft, adopt, amend, and implement a GSP (Wat. Code, § 10725 *et seq.*; § 10728.4); and

G. **WHEREAS**, the DM-II GSA is a member of the Northern and Central Delta-Mendota Region formed for the purpose developing a GSP and coordinating sustainable groundwater management in the Northern and Central Regions of the Delta-Mendota Subbasin (Wat. Code, § 10723.6(i)); and

H. **WHEREAS**, the San Luis & Delta-Mendota Water Authority (“SLDMWA”) submitted an Initial Notification to DWR on behalf of the members of the Northern and Central Delta-Mendota Regions to jointly develop a single GSP for the Northern and Central Regions of the Delta-Mendota Subbasin on January 5, 2018; and

I. **WHEREAS**, other GSAs in the Delta-Mendota Subbasin prepared separate GSPs for other regions of the Delta-Mendota Subbasin for a total of six GSPs covering the entire Delta-Mendota Subbasin (each, a “GSP Group”); and

J. **WHEREAS**, the GSAs from all six GSP Groups entered into a Coordination Agreement effective December 12, 2018 (the “Coordination Agreement”) to comply with SGMA and ensure that the multiple GSPs within the Delta-Mendota Subbasin would be developed and

implemented utilizing the same methodologies and assumptions, that the elements of the GSPs are appropriately coordinated to support sustainable management, and to show how the multiple GSPs will achieve the sustainability goal for the Subbasin. The Coordination Agreement also established a Coordination Committee composed of representatives from each GSP Group, outlined information sharing obligations, procedures for resolving conflicts, and designated the SLDMWA as the Plan Manager for the Delta-Mendota Subbasin; and

K. **WHEREAS**, SGMA states that a GSA “may adopt or amend a [GSP] after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment” (Wat. Code, § 10728.4); and

L. **WHEREAS**, all the GSAs comprising the Northern and Central Regions of the Delta-Mendota Subbasin coordinated to develop the Northern & Central Delta-Mendota Region GSP (“N-C DM GSP”), which was adopted by the DM-II GSA after a public hearing and 90-day notification to the affected city and counties on December 18, 2019; and

M. **WHEREAS**, the Plan Manager submitted the N-C DM GSP and the Coordination Agreement to DWR on January 23, 2020; and

N. **WHEREAS**, on January 21, 2022, DWR completed its review of all the GSPs in the Delta-Mendota Subbasin and released a letter determining that the GSPs for the Delta-Mendota Subbasin as a whole were “Incomplete” and identified deficiencies and corrective actions for the GSAs in the Delta-Mendota Subbasin to take. Amended or modified GSPs addressing the corrective actions from each GSP Group must be submitted to DWR by July 20, 2022; and

O. **WHEREAS**, on March 15, 2022, the Plan Manager transmitted the 90-Day Notice to affected cities and counties notifying them of the Northern and Central Region GSAs’ intent to adopt an amended N-C DM GSP at one or more public hearings to be scheduled not earlier than June 22, 2022, and inviting consultation with the affected cities and counties; and

P. **WHEREAS**, all the GSAs comprising the Northern and Central Regions of the Delta-Mendota Subbasin and the Coordination Committee have, in order to address the deficiencies and to effect the corrective actions identified by DWR, continued to coordinate to develop the draft of the amended N-C DM GSP (“Amended N-C DM GSP”) and publicly released the draft Amended N-C DM GSP on June 20, 2022; and

Q. **WHEREAS**, on June 20, 2022, the GSAs comprising the Northern and Central Regions of the Delta-Mendota Subbasin recommended each of its members adopt the final draft Amended N-C DM GSP for their respective jurisdiction.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the DM-II GSA finds as follows:

1. The DM-II GSA Board hereby approves and adopts the final draft Amended N-C DM GSP, dated June 20, 2022, in substantially the form presented, subject to such modifications as the executing officer shall approve, said execution to provide conclusive proof of approval of any such modifications.

2. The DM-II GSA Board authorizes the DM-II Staff, the SLDMWA, its consultants, and the Plan Manager to take such other actions as may be reasonably necessary to submit the Amended N-C DM GSP to DWR by July 20, 2022, and implement the purpose of this Resolution.

PASSED, APPROVED, AND ADOPTED this 15th day of 2022 by the following vote:

AYES: Koster, Bays, Jasper, Lucich, Maring, Perez, Lara, Beltran and Peterson
NAYS: None
ABSTAIN: None
ABSENT: Sandhu, Beltran and Reeves

Ken A. Perry
Chairman

Attest:

AS
Secretary

7-15-2022
Date:

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Undesirable Results and Indicators Per NCDM GSP		
SMC	UR	UR Indicator
Chronic Lowering of GWL	An undesirable result for chronic lowering of groundwater levels in the Delta-Mendota Subbasin is experienced through significant and unreasonable chronic changes in groundwater levels that diminish access to groundwater, causing significant and unreasonable impacts to beneficial uses and users of groundwater.	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 and unreasonable is quantitatively defined as exceeding the minimum threshold at more than 50 percent of representative monitoring sites by principal aquifer in a GSP area.
Reduction GW Storage	A significant and unreasonable undesirable result for reduction of groundwater storage in the Delta-Mendota Subbasin is defined as a chronic decrease in groundwater storage that causes a significant and unreasonable impact to the beneficial uses and users of groundwater. 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.	The same trigger for an undesirable result for the chronic lowering of groundwater levels is applicable to the long-term reduction of groundwater storage in the Upper Aquifer and for inelastic land subsidence in the Lower Aquifer. Long-term reductions in storage are not anticipated for either principal aquifer so long as groundwater levels in the Upper Aquifer and land subsidence in the Lower Aquifer are managed above the respective proxy minimum thresholds. Through coordination with the other GSP Groups in the Delta-Mendota Subbasin, additional projects and/or management actions will be implemented to prevent long-term decline in groundwater storage.
Degraded WQ	Undesirable results for the degradation of groundwater quality in the Delta-Mendota Subbasin is defined as the degradation of groundwater quality as a result of groundwater management activities that causes significant and unreasonable impacts to beneficial uses and users of groundwater. 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.	An undesirable result for degraded water quality is triggered, or considered "significant and unreasonable," when the minimum threshold at more than 50 percent of representative monitoring sites by principal aquifer in the GSP area is exceeded where current groundwater quality does not exceed 1,000 milligrams per liter (mg/L) of TDS.
Land Subsidence	An undesirable result for land subsidence in the Delta-Mendota Subbasin is experienced through changes in ground surface elevation that cause damage to critical infrastructure that would cause significant and unreasonable reductions of conveyance capacity, impacts to natural resources, or conditions that threaten public health and safety.	<ul style="list-style-type: none"> · Significant and unreasonable damage to conveyance capacity from inelastic land subsidence is structural damage that decreases an unmitigated and unmanageable reduction of design capacity or freeboard. · 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. · 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.

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Depletion of Interconnected Surface Water	Undesirable results for depletions of interconnected surface water in the Delta-Mendota Subbasin is experienced through depletions of interconnected surface water as a direct result of groundwater pumping that causes significant and unreasonable impacts on natural resources or downstream beneficial uses and users.	An undesirable result for depletions of interconnected surface water is triggered, or considered "significant and unreasonable," when 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.
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