

IX.



# MEMORANDUM

TO: SLDMWA Board of Directors, Alternates

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

DATE: October 7, 2021

RE: Activity Agreements – Staff Report for September 2021

This memorandum serves as the Staff Report for September 2021 regarding specified<sup>1</sup> Water Authority activities not separately addressed on the Board meeting agenda.

**1. Integrated Regional Water Management (IRWM) Activity Summary**

*San Joaquin River Funding Area (SJRFA)*

Work continues for all projects for the Proposition 1 Round 1 IRWM Implementation grant for the SJRFA in the Westside San Joaquin (WSJ) IRWM Region. Administered through SLDMWA, the grant includes funding for four projects within the SJRFA and one project within the Tulare-Kern Funding Area.

*Tulare-Kern Funding Area (TKFA)*

Construction work is now complete on the City of Huron Groundwater Supply Well and Recharge Project. The project provided new groundwater and monitoring wells for the City of Huron, a designated disadvantaged community (DAC). The supply well will reduce the community's need to purchase water by generating more than 50% of Huron's drinking water demands.

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

The IRWM Roundtable of Regions (ROR), a statewide IRWM information and advocacy group, recently discussed pending funding opportunities available through the Department of Water Resources (DWR), the State Water Resources Control Board (SWRCB), and the U.S. Bureau of Reclamation. The ROR Steering Committee announced the 2021 IRWM Summit will be held virtually the mornings of November 15-17. A presentation by the California Association of Resource Conservation Districts highlighted opportunities for collaboration and cooperation between the programs.

<sup>1</sup> 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).

## **2. Sustainable Groundwater Management Activity (SGMA) Activity Summary**

### **Northern and Central Delta-Mendota Regions**

The Northern and Central Management Committees held their regular joint meeting in late September. They received an analysis of possible comments on the Northern & Central Delta-Mendota Region Groundwater Sustainability Plan (GSP), based on comments made by the SWRCB on the neighboring Chowchilla and Merced Subbasins (the Eastern San Joaquin and Tulare Lake Subbasins also received comments).

Groundwater Sustainability Agencies (GSAs) and member agencies continue to review progress on monitoring and implementation efforts, including review of recent well census and inventory development. The well census and inventory project for the Northern and Central Regions has focused on identifying well locations and construction information and verifying local agency and landowners' records. This effort is supported by the Subbasin's Proposition 68 Sustainable Groundwater Management (SGM) Implementation grant.

### **General SGMA Activities**

The consultant conducting the Delta-Mendota Subbasin Subsidence Characterization and Project Feasibility Study has moved into the data analysis phase of work. The consultant will present initial results at a special Technical Working Group meeting later this month. Activities for this project are being paid for by a Proposition 68 SGM Implementation grant.

GSAs have started collecting fall/seasonal low water level data at representative monitoring sites in the Subbasin. The deadline to collect this data is October 31, 2021. This is also the deadline to have water quality data uploaded into the Subbasin's Data Management System.

Representatives from GSP Groups and SLDMWA staff are preparing to respond to funding opportunities available for SGMA Implementation resulting from SB 170. The bill allocates approximately \$180 million for critically overdrafted basins, with applications accepted as soon as this month. Both the Northern and Central Management Committees and the Coordination Committee are working to identify priority areas for the funding.

Staff participated in informational workshops and webinars including DWR's Draft Drinking Water Well Principles and Strategies and the Mid San Joaquin Regional Flood Management Plan Climate Resilience Workshop.

## **3. Drainage Activity Summary**

### **Grassland Basin Drainage Management Steering Committee Activity Summary**

Threat to Fish Report – The GBD are required to submit a report on July 31, 2021 under Section 13267 of the California Water Code that would include all data available on fish tissue sampling since the beginning of the Grassland Bypass Project since 1996. The report was submitted on July 30 and follow up questions were answered.

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Mud Slough Mitigation Project – the project to restore Mud Slough (north) flows to the Newman Lake north of Highway 140 is ongoing. The CEQA Initial Study was circulated for public comment in late June. Public comments were received and work is ongoing to prepare responses to the comments. Prepared response to comments for review with legal team.

Other ongoing activities – continue to review GBD invoices, manage storm flow activities, 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.

Proceed development of installation of monitoring wells and other operational installation for Grassland Bypass Project.

Follow up on PCFFA lawsuit issues. Participate in conference calls and prepare summary data. Research data and prepare response.

#### **San Joaquin Valley Drainage Authority Activity Summary**

Continue management of the Westside San Joaquin River Watershed Coalition to comply with the Irrigated Lands Regulatory Program. 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. Organize and make presentation to outreach meetings for surface and groundwater management plan. Assist grower members in completing the required reporting forms and self-certification requirements. Enter farmer evaluation and nitrogen summary reports into coalition database.

Participate in group conference calls regarding surface and groundwater management plans, groundwater protection formulas and the CVSalts prioritization and optimization studies. Participate in Central Valley Groundwater Monitoring Collaborative conference calls. Participate in Regional Board quarterly conference calls.

Begin planning for development of Management Zone implementation. Manage ongoing monitoring. Revise the QAPP for the monitoring program.

Management continued for the Prop 84 Real Time Management Program Grant for compliance with the San Joaquin River Salt and Boron TMDL. Follow up and direct field work in northerly stations. Organize and lead September SJVDA Board meeting.

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**Anthea Hansen**

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**From:** Anthea Hansen  
**Sent:** Tuesday, October 12, 2021 2:15 PM  
**To:** 'John Brodie'; Claire Howard  
**Cc:** J. Scott Petersen  
**Subject:** RE: Westside San Joaquin IRWM TAC Meeting

Hi John,

Can we also add an agenda item to receive an update on the movement of DAC grant funds to the Community of Westley/Grayson that occurred at the end of July.

Thanks,  
Anthea

*Anthea G. Hansen*  
General Manager  
Del Puerto Water District  
PH 209-892-4470/FAX 209-892-4469

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**From:** John Brodie <john.brodie@sldmwa.org>  
**Sent:** Tuesday, October 5, 2021 4:41 PM  
**To:** Claire Howard <claire.howard@sldmwa.org>  
**Cc:** J. Scott Petersen <scott.petersen@sldmwa.org>  
**Subject:** Westside San Joaquin IRWM TAC Meeting

Dear Westside San Joaquin IRWM TAC Members,

We would like to schedule a meeting to discuss three items for possible recommendation to the IRWM Activity Agreement participants later this year. The items for consideration are:

- A project ranking from the OPTI data base list for use in grant funding availability and proposals including Proposition 1, Round 2 (anticipated Spring 2022).
- Review of an annual report example for the purposes of outlining a WSJ IRWM Annual Report to summarize activities completed in WY 2021.
- Review draft budget for FY 2023.

Please indicate your availability for a meeting in the Doodle poll at the following link: [https://doodle.com/poll/86er4mbm5qbuc3m?utm\\_source=poll&utm\\_medium=link](https://doodle.com/poll/86er4mbm5qbuc3m?utm_source=poll&utm_medium=link)

Thank you,

*John Brodie*  
Water Resources Program Manager

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## 16. WESTSIDE SAN JOAQUIN RIVER WATERSHED COALITION GROUNDWATER QUALITY FIVE-YEAR ASSESSMENT REPORT

### 16.1 Groundwater Quality Trend Monitoring Results 2020

#### 16.1.1 GQTM Summary of 2020 Network and Sampled Wells

The Westside San Joaquin River Watershed Coalition (Coalition) completed monitoring of the Groundwater Quality Trend Monitoring network of 25 wells in Summer 2020 (**Figure 16-1**). Details on the 2020 GQTM network wells are presented in **Table 16-1**. The Westside Coalition GQTM well network 2020 sampling event occurred during mid to late August 2020 and included sampling of a total of 23 wells. While conducting the 2020 sampling activities three network wells could not be sampled for a variety of reasons listed below. One replacement well was sampled in 2020.

- WSJRC00012: damaged by heavy machinery and not operational in 2020; well repairs were completed and the well has been returned to service.
- WSJRC00020: dry in 2020 and removed from the network; a nearby well (WSJRC00028) was identified for use as replacement and sampled in 2020.
- WSJRC00023: not operational and all pumping equipment had been removed from the well in 2020; the Coalition is coordinating with the owner to determine the future status of the well for the GQTM network.

In accordance with the annual and five-year GQTM sampling schedule, five wells sampled for the first time as part of the GQTM were tested for nitrate + nitrite, total dissolved solids (TDS), and major cations and anions as required every five years, meanwhile the remaining network wells previously sampled for the GQTM were only tested for nitrate, as required for annual monitoring. All wells sampled for the GQTM were also tested for field parameters, including specific conductance, pH, temperature, dissolved oxygen, oxidation-reduction potential, and turbidity. The results from the 2020 sampling event are presented in **Table 16-2**.

Results for six of the sampled wells (WSJRC00002, WSJRC00006, WSJRC00008, WSJRC00024, WSJRC00025 and WSJRC00028) exceeded the primary drinking water MCL of 10 milligrams per liter (mg/L) for nitrate (as nitrogen). Four of the wells exceeding the MCL for nitrate had concentrations only marginally higher than the MCL of 10 mg/L. Well WSJRC00008 had a result of 10 mg/L; however, a duplicate sample measured above MCL at 11 mg/L. Wells WSJRC00002 and WSJRC00006 had relatively higher nitrate concentrations above the MCL at 16 and 17 mg/L, respectively. Of the five wells sampled for the first time as part of the GQTM program, which included sampling for a broader suite of analytes as required at a five-year interval, three of the five wells exceeded the secondary recommended drinking water MCL for total dissolved solids

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(TDS) of 500 mg/L and one well (WSJRC00028) had a TDS concentration at or above the secondary upper MCL of 1,000 mg/L. The relatively high TDS concentrations in many network wells is reflective of the naturally high salinity of groundwater in the region. Chloride concentrations in all five wells sampled for chloride in 2020 remain below the secondary recommended drinking water MCL of 250 mg/L. One well had sulfate concentrations above the secondary recommended drinking water MCL of 250 mg/L, but below the upper secondary MCL of 500 mg/L. No wells had boron concentrations above the State public health goal (PHG) of 1 mg/L, although high levels of boron are common in groundwater in parts of the Coalition region as a result of the naturally occurring boron in sediments.



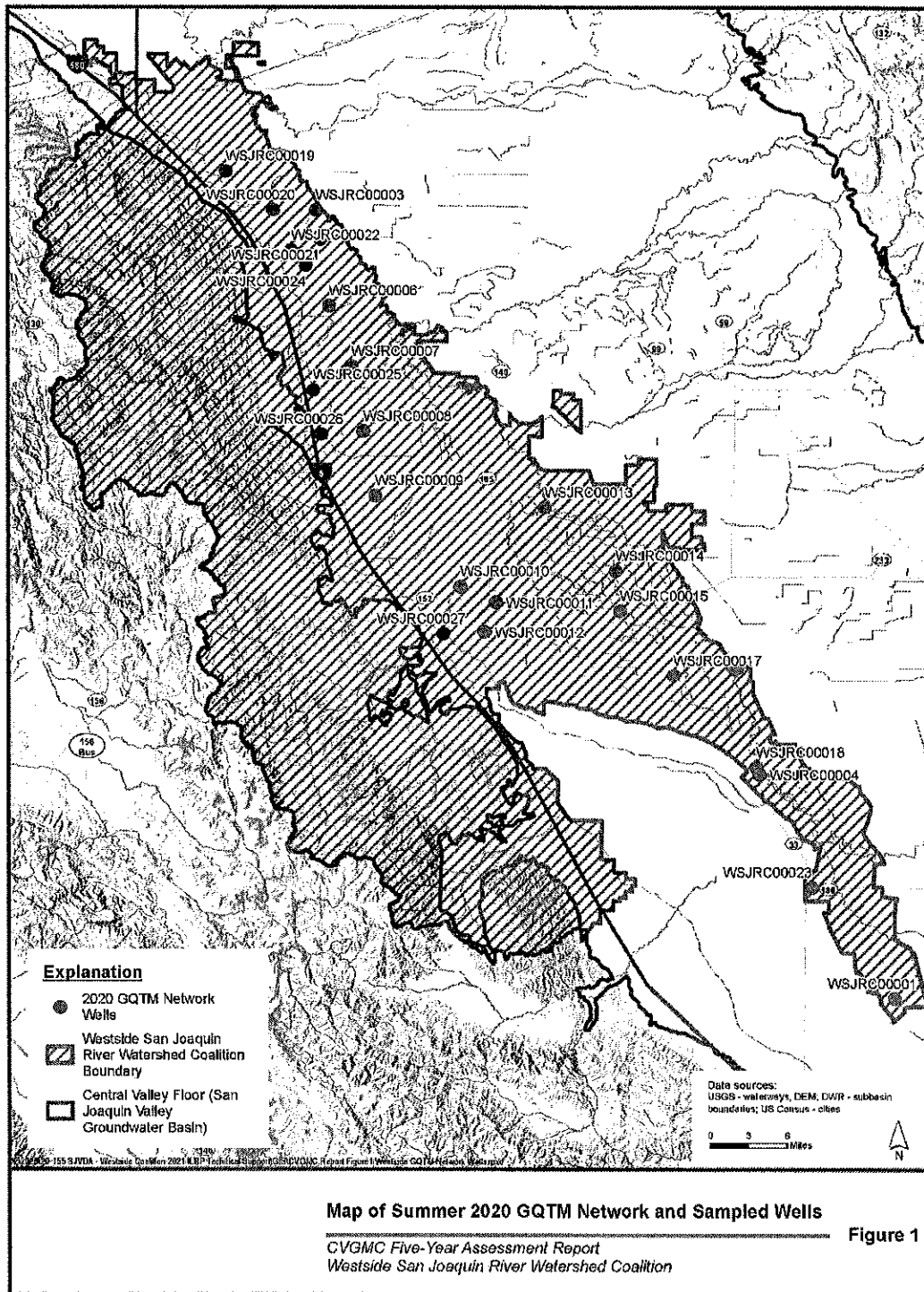


Figure 16-1. Map of Summer 2020 GQTM Network and Sampled Wells



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**Table 16-1. 2020 GQTM Network Wells**

Field Point Name / GQTM Well ID	GQTM Well Name	Well Use	Well Construction Information							Latitude	Longitude	Datum	Depth Bottom of Upper Zone (feet) <sup>1</sup>
			Seal Depth (feet)	Total Well Depth (feet)	Depth Top of Screen (feet)	Depth Bottom of Screen (feet)	Year Drilled						
WSJRC00001	WSJ001	Domestic	20	212	165	205		36.60985	-120.263	NAD83	458.175		
WSJRC00002	WSJ002	Domestic	50	212	172	212		37.5716	-121.209	NAD83	192.206		
WSJRC00003	WSJ003	Irrigation	20	255	130	250		37.49403	-121.086	NAD83	168.26		
WSJRC00004	WSJ004	Municipal	100	245	115	220		36.86157	-120.452	NAD83	207.382		
WSJRC00006	WSJ006	Domestic	60	200	164	184		37.38611	-121.066	NAD83	195.051		
WSJRC00007	WSJ007	Domestic	65	203	20	160		37.31794	-121.033	NAD83	184.632		
WSJRC00008	WSJ008	Domestic	120	175	155	175		37.2445	-121.016	NAD83	144.79		
WSJRC00009	WSJ009	Domestic	80	205	100	140		37.17213	-120.998	NAD83	159.045		
WSJRC00010	WSJ010	Municipal	90	540	135	275		37.07059	-120.876	NAD83	150.839		
WSJRC00011	WSJ011	Municipal	50	242	125	208		37.05321	-120.826	NAD83	181.183		
WSJRC00012	WSJ012	Domestic	150	210	170	200		37.01647	-120.841	NAD83	200.68		
WSJRC00013	WSJ013	Irrigation	50	210	80	180		37.16078	-120.758	NAD83	198.18		
WSJRC00014	WSJ014	Irrigation	50	180	60	180		37.0897	-120.657	NAD83	172.058		
WSJRC00015	WSJ015	Irrigation	50	184	60	180		37.04465	-120.65	NAD83	178.493		
WSJRC00017	WSJ017	Irrigation	20	165	60	160		36.97232	-120.574	NAD83	225.534		
WSJRC00018	WSJ018	Irrigation		245	86	236		36.86651	-120.456	NAD83	179.918		
WSJRC00019	WSJ019	Domestic	20	185	130	150		37.53697	-121.214	NAD83	150.93		
WSJRC00020	WSJ020	Domestic		193	175	193		37.49363	-121.147	NAD83	221.887		
WSJRC00021	WSJ021	Domestic	22	275	160	270		37.46162	-121.079	NAD83	182.762		
WSJRC00022	WSJ022	Domestic	20	370	350	370		37.44868	-121.12	NAD83	199.224		

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**Table 16-1. 2020 GQTM Network Wells**

Field Point Name / GQTM Well ID	GQTM Well Name	Well Use	Well Construction Information						Latitude	Longitude	Datum	Depth Bottom of Upper Zone (feet) <sup>†</sup>
			Seal Depth (feet)	Total Well Depth (feet)	Depth Top of Screen (feet)	Depth Bottom of Screen (feet)	Year Drilled					
WSJRC00023	WSJ023	Irrigation		250					36.73438	-120.378	NAD83	305.597
WSJRC00024	WSJ024	Observation	71	115	95	115	2010		37.43139	-121.099	NAD83	193.961
WSJRC00025	WSJ025	Observation	92	135	115	135	2010		37.2907	-121.088	NAD83	124.01
WSJRC00026	WSJ026	Irrigation	25	170	120	150	1999		37.24066	-121.075	NAD83	167.974
WSJRC00027	WSJ027	Observation	75	160	150	160	2010		37.0173	-120.9	NAD83	216.064
WSJRC00028	WSJ028	Domestic	50	260	160	260	2020		37.49364	-120.147	NAD83	221.887

**Table 16-2. 2020 GQTM Sampling Results**

Field Point Name / GQTM Well ID	GQTM Well Name	Well Use	Date Sampled	Nitrate as N (mg/L) Lab	pH Field	Specific Conductance (uS/cm) Field	Temperature (°C) Field	Dissolved Oxygen (mg/L) Field	Depth to Water (ft) Field
WSJRC00001	WSJ001	Domestic	8/21/2020	< 0.027	7.41	4129	19.7	0.38	77.56
WSJRC00002	WSJ002	Domestic	8/17/2020	16	6.97	1764	20	6.76	NR
WSJRC00003	WSJ003	Irrigation	8/18/2020	0.26	7.46	2749	19.5	2.96	NR
WSJRC00004	WSJ004	Municipal	8/20/2020	< 0.027	7.76	845	18.7	1.48	150
WSJRC00006	WSJ006	Domestic	8/18/2020	17	7.65	1235	22.1	4.78	61.88
WSJRC00007	WSJ007	Domestic	8/18/2020	7.7	7.65	1399	20.5	5.8	NR
WSJRC00008	WSJ008	Domestic	8/20/2020	10	7.76	1381	20.5	3.58	NR
WSJRC00009	WSJ009	Domestic	8/25/2020	6.1	7.37	1195	20.7	3.72	NR

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**Table 16-2. 2020 GQTM Sampling Results**

Field Point Name / GQTM Well ID	GQTM Well Name	Well Use	Date Sampled	Nitrate as N (mg/L) Lab	pH Field	Specific Conductance (uS/cm) Field	Temperature (°C) Field	Dissolved Oxygen (mg/L) Field	Depth to Water (ft) Field
WSJRC00010	WSJ010	Municipal	8/17/2020	4.5	7.45	781	19.1	2.74	NR
WSJRC00011	WSJ011	Municipal	8/17/2020	7.3	7.32	1469	22	2.78	120
WSJRC00013	WSJ013	Irrigation	8/27/2020	< 0.027	7.34	1788	18.2	1.46	10.13
WSJRC00014	WSJ014	Irrigation	8/27/2020	< 0.027	7.58	1332	19.5	5.03	NR
WSJRC00015	WSJ015	Irrigation	8/27/2020	< 0.027	7.39	1345	20.5	5.6	NR
WSJRC00017	WSJ017	Irrigation	8/25/2020	< 0.027	7.33	1598	22.3	2.81	NR
WSJRC00018	WSJ018	Irrigation	8/25/2020	0.11	7.65	781	21.6	5.46	NR
WSJRC00019	WSJ019	Domestic	8/17/2020	8.8	7.32	1371	21.5	7.02	89.31
WSJRC00021	WSJ021	Domestic	8/17/2020	5.2	7.53	1859	20.3	3.45	NR
WSJRC00022	WSJ022	Domestic	8/17/2020	7.1	6.69	1464	22.6	3.01	NR
WSJRC00024	WSJ024	Observation	8/24/2020	12	7.69	1079	20.2	4.51	48.35
WSJRC00025	WSJ025	Observation	8/24/2020	12	7.34	1788	18.2	1.46	17.62
WSJRC00026	WSJ026	Irrigation	8/18/2020	8.9	7.32	1040	19.7	7.46	NR
WSJRC00027	WSJ027	Observation	8/24/2020	1.8	7.57	752	24.2	2.37	96.7
WSJRC00028	WSJ028	Domestic	8/17/2020	11	7.09	1769	20.7	4.83	NR

NR= Not Recorded

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### **16.1.2 Summary of Quality Assurance Evaluation for 2020 Sampling Event**

Consistent with the QAPP, field measurements of electrical conductivity (EC) at 25°C, pH, dissolved oxygen (DO) and temperature (T) were obtained during the sample retrieval and the laboratory performed analysis for nitrate + nitrite as nitrogen, boron (B), sodium (Na), potassium (K), calcium (Ca), magnesium (Mg), chloride (Cl), sulfate (SO<sub>4</sub>), carbonate and bicarbonate alkalinity, and total dissolved solids (TDS), in accordance with the annual and five-year sampling schedule in the GQTM Workplan and QAPP. Additional field parameters of turbidity and oxidation-reduction potential (ORP) were also recorded during sampling.

#### **16.1.2.1 Purging, sample handling, and custody**

Wells were purged according to the SOP. Samples were retrieved upon stabilization of indicator parameters (i.e., EC and pH) and after the turbidity of the discharging water dropped below 10 NTUs. Purging and sampling activities were documented on field sheets provided in the QAPP. Samples were collected in laboratory-supplied bottles and transported under prescribed chain of custody to the laboratory according to the QAPP.

#### **16.1.2.2 Access and field and analytical completeness**

A total of 25 wells were planned for sampling and 23 wells were able to be sampled to include a well that was not previously planned to be sampled. Excluding WSJRC00020 which was replaced by WSJRC00028 this results in an overall 92 percent completeness for well sampling and field parameters (**Table 16-3**). Additionally, all well samples collected were analyzed at the laboratory resulting in 100 percent analytical completeness (**Table 16-3**). For the purpose of field quality control (QC), the QAPP prescribes the collection of one duplicate sample and one blank sample for every 20 samples retrieved (each must be at least 5 percent of total samples). In accordance with the QAPP, six duplicate samples were retrieved representing 26 percent of the wells sampled for nitrate. One duplicate sample was taken for all other constituents representing 20 percent of the wells sample for the five-year analysis. Five field blanks were submitted to the laboratory resulting in 21.7 percent of the samples analyzed for nitrate and one field blank was taken for five-year analysis representing 20 percent of the total five year samples. The assessment of completeness for field QC sampling is summarized in **Table 16-4**. A summary of the hold times specified in the QAPP for the laboratory analyses is presented in **Table 16-5**. All analyses were conducted within the allowed hold time.



**Table 16-3. Completeness of Field and Analytical Testing**

Constituent	Test Type	Analytical Method	Matrix	Wells Planned for Sampling	Dry	No Access	Wells Sampled	Field and Transport Completeness %	Total Samples Analyzed	Analytical Completeness %
Oxygen, Dissolved	Field parameter	EPA 360.1	Groundwater	26	1	2	23	92.3	23	100
pH	Field parameter	EPA 150.1	Groundwater	26	1	2	23	92.3	23	100
Specific Conductivity	Field parameter	EPA 120.1	Groundwater	26	1	2	23	92.3	23	100
Temperature	Field parameter	SM 2550	Groundwater	26	1	2	23	92.3	23	100
Nitrate as N	Laboratory	EPA 300.0	Groundwater	26	1	2	23	92.3	23	100
<b>Total</b>				<b>130</b>	<b>5</b>	<b>10</b>	<b>115</b>	<b>92.3</b>	<b>115</b>	<b>100</b>

**Table 16-4. Completeness of Field QC**

Constituent	Analytical Method	Matrix	Total Well Samples Analyzed	Field Duplicate Samples Analyzed	Field Blank Samples Analyzed	Total Samples Analyzed (well and duplicates)	Field Duplicate Completeness %	Field Blank Completeness %
Nitrate as N	EPA 300.0	groundwater	23	6	5	34	17.6	14.7
<b>Total</b>			<b>23</b>	<b>6</b>	<b>5</b>	<b>34</b>	<b>17.6</b>	<b>14.7</b>

Completeness values below the acceptability requirement of 5 percent are presented in **bold**.

**Table 16-5. Evaluation of Sample Hold Times**

Constituent	Analytical Method	Matrix	Hold Time	Total Samples Analyzed	Samples Analyzed within Hold Time	Acceptability %
Nitrate as N	EPA 300.0	groundwater	28 days	34	34	100
<b>Total</b>				<b>34</b>	<b>34</b>	<b>100</b>

Acceptability values below 90 percent are presented in **bold**.

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### 16.1.2.3 Analytical precision and accuracy

The laboratory performed all QA/QC for laboratory precision and accuracy in accordance with the QAPP including lab blanks, lab duplicates, matrix spikes, and lab control spikes. Results of the assessment of precision and accuracy are summarized in **Tables 16-6** and **16-7** and include evaluation of chemistry QC with field and laboratory blank samples; laboratory control and matrix spikes to evaluate accuracy; and field, laboratory, and matrix spike duplicates to evaluate precision. Analytical precision and accuracy met all acceptability requirements for nitrate samples tested. All lab blanks, lab control spikes, and lab control duplicates had 100 percent acceptability among samples tested. Of the 14 matrix spikes analyzed, 12 were within the acceptability range resulting in an overall matrix spike acceptability of 85.7%.

**Table 16-6. Evaluation of Field Duplicates and Blanks**

Constituent	Analytical Method	Matrix	Sample Type	Acceptability Requirement	Total Samples	Samples within Acceptability	Acceptability %
Nitrate as N	EPA 300.0	groundwater	Field Duplicate	RPD ≤ 25	6	6	100
<b>Field Duplicate Total</b>					<b>6</b>	<b>6</b>	<b>100</b>
Acceptability values below 90 percent are presented in <b>bold</b> .							
Constituent	Analytical Method	Matrix	Sample Type	Acceptability Requirement	Total Samples	Samples within Acceptability	Acceptability %
Nitrate as N	EPA 300.0	groundwater	Field Blank	< RL or 1/5 environmental sample	5	5	100
<b>Field Duplicate Total</b>					<b>5</b>	<b>5</b>	<b>100</b>
Acceptability values below 90 percent are presented in <b>bold</b> .							



**Table 16-7. Evaluation of Lab Controls and Spikes**

Constituent	Analytical Method	Matrix	Sample Type	Acceptability Requirement	Total Samples	Samples within Acceptability	Acceptability %
<b>Lab Blanks</b>							
Nitrate as N	EPA 300.0	groundwater	Lab Blank	< RL	4	4	100
<b>Lab Blank Total</b>					<b>4</b>	<b>4</b>	<b>100</b>
<b>Lab Control Spikes</b>							
Nitrate as N	EPA 300.0	groundwater	LCS	PR 90-110	8	8	100
<b>Lab Control Total</b>					<b>8</b>	<b>8</b>	<b>100</b>
<b>Matrix Spikes</b>							
Nitrate as N	EPA 300.0	groundwater	MS	PR 80-120	14	14	100
<b>Matrix Spike Total</b>					<b>14</b>	<b>14</b>	<b>100</b>
<b>Analytical Duplicates</b>							
Nitrate as N	EPA 300.0	groundwater	MSD/LCSD/Lab Dup	RPD ≤ 25	11	11	100
<b>Analytical Duplicate Total</b>					<b>11</b>	<b>11</b>	<b>100</b>
Acceptability values below 90 percent are presented in <b>bold</b> .							
LCS=lab control spike; MS=matrix spike; MSD=matrix spike duplicate; LCSD=lab control spike duplicate							

#### 16.1.2.4 Quality assurance evaluation conclusions

All groundwater quality data are deemed acceptable based on the review of QA/QC procedures and results in accordance with the requirements in the QAPP. No field duplicate or field blanks were outside of acceptability limits for any analyte.

#### 16.1.2.5 Electronic Data Submittal and Data Uploaded to GeoTracker

In accordance with the requirements for electronic data submittal, the Coalition has already submitted all 2020 GQTM results to GeoTracker.

### 16.1.3 Five-Year Assessment Results and Discussion

Luhdorff & Scalmanini Consulting Engineers (LSCE) conducted both parametric and non-parametric analyses of Nitrate as N (**Nitrate or NO<sub>3</sub>-N**) and Total Dissolved Solids (**TDS**) trends within the CWDC primary area boundary. Methodology for each of these analyses is discussed in **Section 5**. All of the **Section 5** figures pertinent to this individual coalition chapter are presented in **Appendix N**.

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Nitrate concentrations in GQTM wells sampled in 2020 were generally low, although six nitrate MCL exceedances (>10 mg/L) did occur. The six nitrate exceedances in 2020 occurred in wells located in the more northern and western parts of the Coalition region generally in the area between Gustine and Tracy. Three additional wells located within this region had nitrate concentration between 7.5 mg/L and the MCL of 10 mg/L with four more with concentrations between 5 and 7.5 mg/L.

Most wells have been very stable over the time period sampled and six wells have never had a detectible level of Nitrate. While wells in the GQTM network have been relatively stable there have been some changes of note. Namely WSJRC00018 became detectable at low levels in 2020. WSJRC00019 went from being above MCL at 14 mg/L in 2019 to below MCL at 8.8 mg/L in 2020. Most significantly WSJRC00022 went from being undetectable in 2019 to approaching the MCL at 7.1 mg/L in 2020. Overall groundwater quality trends are unclear due to the short period of record. 14 wells have a 3-year record, 4 wells have a two year record and seven wells have been sampled one time. The understanding of groundwater quality trends will improve as the period of record increases.

Overall, there is good coverage throughout the GQTM network. The network provides greater coverage in the northern extent with southern areas more sparsely monitored but still with sufficient coverage. MA 10 is the only MA lacking coverage. Future efforts to improve the monitoring network should focus on the southern MA's and specifically MA 10.

#### ***16.1.4 Five-Year High Vulnerability Area Update***

##### **16.1.4.1 Existing HVA Compared to Nitrate Exceedances**

To evaluate the current (2015) HVA, all readily and publicly available data on historical nitrate concentrations were examined within the Coalition region. Consistent with the designation of the 2015 HVA in the original GAR, the review of the HVA focusses on the area of the Coalition within alluvial groundwater basins designated by DWR, with a strong focus on the San Joaquin Valley Groundwater Basin (Central Valley Floor) where the vast majority of irrigated agriculture in the Coalition occurs. Of the 1,401 wells with historical nitrate concentration data located within the Coalition, only 19 wells were located outside of the Central Valley Floor with 1,382 wells located within the Central Valley Floor area. Of the 1,382 wells within the Central Valley Floor area, 207 wells have historical concentrations of nitrate exceeding the MCL of 10 mg/L (**Figure 16-2**). Of the 207 historical nitrate exceedance wells, all are located within the 2015 HVA boundary developed as part of the original GAR.



#### 16.1.4.2 HVA Update

The five-year review of the Coalition's HVA seeks to account for all nitrate exceedances in the Coalition that may be related to irrigated agriculture activities. The review of the HVA described above indicates no exceedances occurring outside of the extent of the 2015 HVA. This suggests the existing 2015 HVA is appropriate and sufficient and no modifications to the HVA extent are needed at this time. As a result, the 2021 HVA is unchanged from the HVA previously approved in the 2015 GAR (**Figure 16-3**).

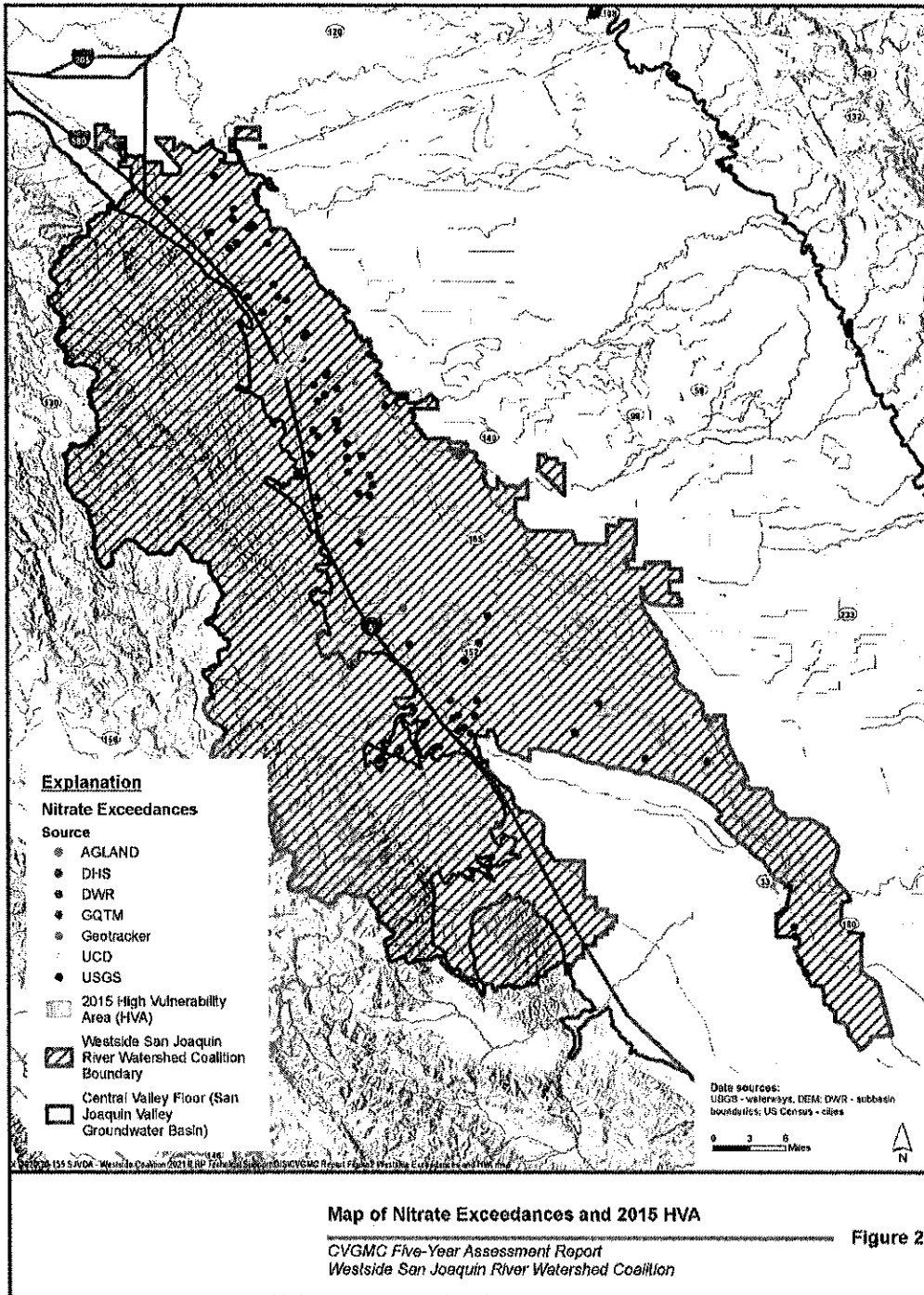


Figure 16-2. Map of Nitrate Exceedances and 2015 HVA

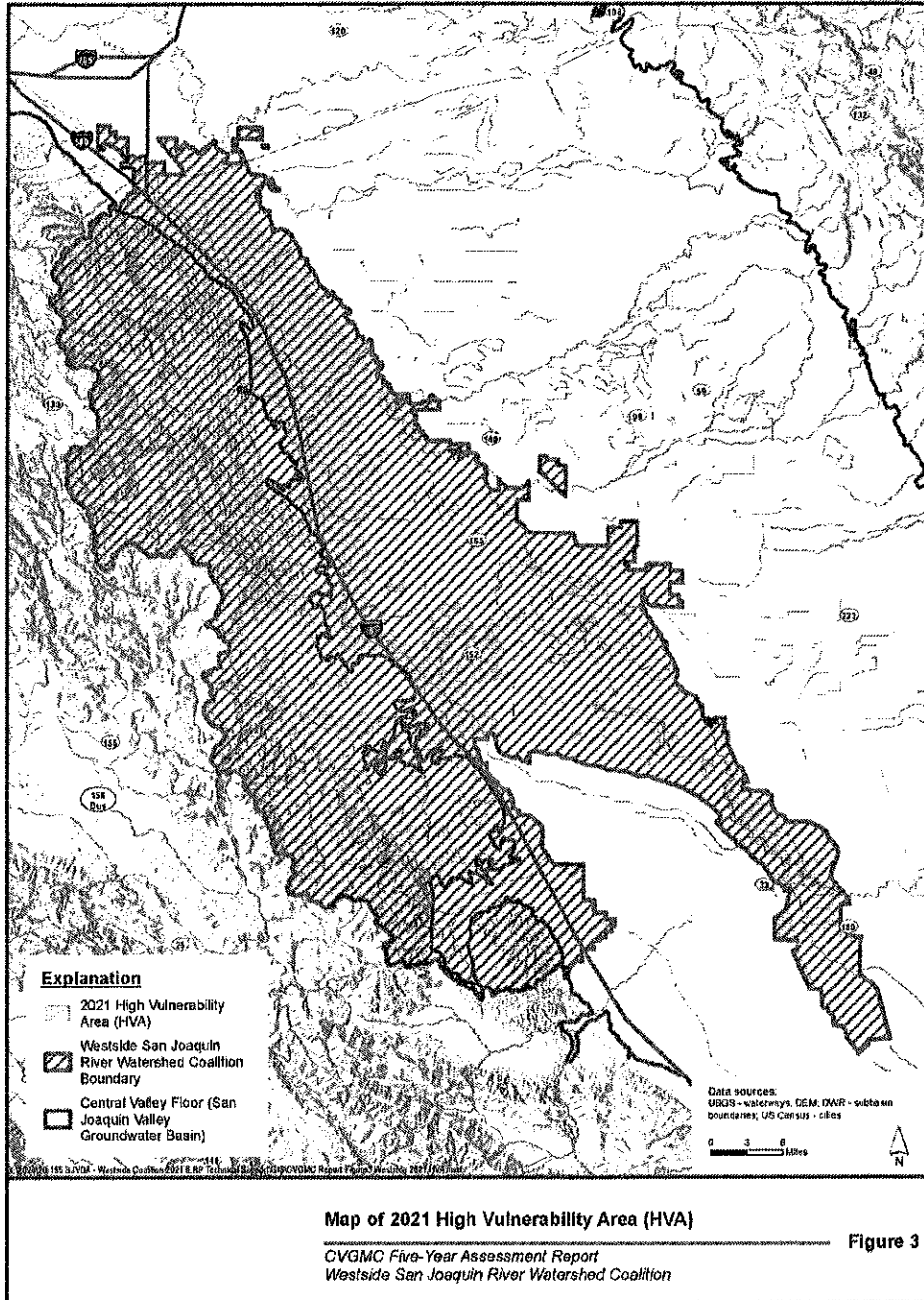


Figure 16-3. Map of High Vulnerability Area (HVA)

## **SUMMERS ENGINEERING**

887 N. Irwin St. – PO Box 1122  
Hanford, CA 93232  
(559) 582-9237 FAX (559) 582-7632

### **MEMORANDUM**

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TO: SJVDA Board of Directors  
FROM: Orvil Mckinnis  
DATE: October 1, 2021  
SUBJECT: WSJRWC Work Task Progress

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Current tasks being completed include:

- Reviewing 2021 Membership List, 2020 FE and INMPSR Compliance List and submit both lists to the Regional Board on 9/30/2021
- Organizing analog and digital material for 2021/2022 Annual Grower Meetings – Meetings will be offered online only due to continuing COVID restrictions.
- Preparing Exceedance Communication Reports for July and August 2021 for transmission to the Regional Board.
- Receive, review, and comment on laboratory monitoring reports and electronic data deliverables.
- Processing Pesticide Use Report data to create grower contact list and outreach packets for recent pesticide/toxicity exceedances.
- Continuing to receive and process FE and INMPSR forms from growers. The INMPSR was due 4/15/2021 and the FE was due 3/1/2021.
- Attend Formula, Values, and Targets meetings; review and analyze Nitrogen applied data at the Township level to determine the N applied values for the Coalition's GW HVAs.
- Attend CVGMC meetings and provide groundwater information and data to the group for the November 30, 2021 Groundwater Quality Monitoring Report submittal to the Regional Board.

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## Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 6/7/2021 to 6/9/2021

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### Blewett Drain at Highway 132

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	177	6/8/2021	0.001	ug/L		0.00001	
Flow	177	6/8/2021	2.7	cfs		0	
pH	177	6/8/2021	8.6			8.5	6.5

### Del Puerto Creek at Hwy 33

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
EC	177	6/8/2021	1321	µmhos/cm		900	
Flow	177	6/8/2021	18	cfs		0	
pH	177	6/8/2021	9.1			8.5	6.5

### Del Puerto Creek near Cox Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
EC	177	6/8/2021	1324	µmhos/cm		900	
Flow	177	6/8/2021	18	cfs		0	
pH	177	6/8/2021	9.2			8.5	6.5

### Delta Mendota Canal at DPWD

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Flow	177	6/8/2021	900	cfs		0	
pH	177	6/8/2021	9.5			8.5	6.5

### Hospital Creek at River Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	177	6/8/2021	0.007	ug/L		0.00001	
Flow	177	6/8/2021	0	cfs		0	
Hyalella azteca	177	6/8/2021	3.333	%	yes		
Lambda cyhalothrin	177	6/8/2021	0.002	ug/L		0.00001	

### Ingram Creek at River Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
E. Coli	177	6/8/2021	365.4	MPN/100 mL		235	
EC	177	6/8/2021	967	µmhos/cm		900	
Flow	177	6/8/2021	18	cfs		0	
pH	177	6/8/2021	9.6			8.5	6.5

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WQV = Water Quality Value as established by the Central Valley Regional Water Quality Control Board

DNQ = Detected, Not Quantifiable

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## Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 6/7/2021 to 6/9/2021

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### Los Banos Creek at China Camp Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Arsenic	177	6/8/2021	11	ug/L		10	
Boron	177	6/8/2021	2000	ug/L		800	
E. Coli	177	6/8/2021	261.3	MPN/100 mL		235	
EC	177	6/8/2021	2260	µmhos/cm		900	
Molybdenum	177	6/8/2021	15	ug/L		10	

### Los Banos Creek at Hwy 140

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Arsenic	177	6/8/2021	19	ug/L		10	
Boron	177	6/8/2021	1900	ug/L		800	
E. Coli	177	6/8/2021	488.4	MPN/100 mL		235	
EC	177	6/8/2021	2471	µmhos/cm		900	
Molybdenum	177	6/8/2021	13	ug/L		10	

### Mud Slough Upstream of San Luis Drain

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Boron	177	6/8/2021	2700	ug/L		800	
EC	177	6/8/2021	3323	µmhos/cm		900	
Flow	177	6/8/2021	31	cfs		0	
Molybdenum	177	6/8/2021	18	ug/L		10	

### Newman Wasteway near Hills Ferry Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
E. Coli	177	6/8/2021	261.3	MPN/100 mL		235	
EC	177	6/8/2021	1170	µmhos/cm		900	

### Poso Slough at Indiana Ave

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
EC	177	6/8/2021	1101	µmhos/cm		900	
Flow	177	6/8/2021	3	cfs		0	
Hyaella azteca	177	6/8/2021	40	%	yes		

### Salt Slough at Lander Ave

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
E. Coli	177	6/8/2021	261.3	MPN/100 mL		235	
EC	177	6/8/2021	1097	µmhos/cm		900	
Flow	177	6/8/2021	194	cfs		0	

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## Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 6/7/2021 to 6/9/2021

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### Salt Slough at Sand Dam

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	177	6/8/2021	0.004	ug/L		0.00001	
Flow	177	6/8/2021	11	cfs		0	
Lambda cyhalothrin	177	6/8/2021	0.0009	ug/L		0.00001	

### San Joaquin River at Lander Ave

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Flow	177	6/8/2021	33	cfs		0	

### San Joaquin River at PID Pumps

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Diazinon	177	6/8/2021	0.13 =	ug/L		0.1	
EC	177	6/8/2021	1266	µmhos/cm		900	
Flow	177	6/8/2021	179	cfs		0	
pH	177	6/8/2021	9			8.5	6.5

### San Joaquin River at Sack Dam

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Flow	177	6/8/2021	17	cfs		0	

### Westley Wasteway near Cox Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Ammonia as N	177	6/8/2021	0.43	mg/L		0.42	
Bifenthrin	177	6/8/2021	0.004	ug/L		0.00001	
EC	177	6/8/2021	1265	µmhos/cm		900	
Flow	177	6/8/2021	18	cfs		0	
Hyalella azteca	177	6/8/2021	26.67	%	yes		
Lambda cyhalothrin	177	6/8/2021	0.002	ug/L		0.00001	
pH	177	6/8/2021	9.5			8.5	6.5

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# Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 7/12/2021 to 7/15/2021

## Blewett Drain at Highway 132

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.0006	ug/L		0.00001	
Lambda cyhalothrin	178	7/14/2021	0.0008	ug/L		0.00001	

## Del Puerto Creek at Hwy 33

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.002	ug/L		0.00001	
Lambda cyhalothrin	178	7/14/2021	0.0006	ug/L		0.00001	

## Del Puerto Creek near Cox Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.001	ug/L		0.00001	
Lambda cyhalothrin	178	7/14/2021	0.003	ug/L		0.00001	

## Hospital Creek at River Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.009	ug/L		0.00001	
E. Coli	178	7/14/2021	1413.6	MPN/100 mL		235	
Hyalella azteca	178	7/14/2021	33.33	%	yes		
Lambda cyhalothrin	178	7/14/2021	0.002	ug/L		0.00001	

## Ingram Creek at River Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.03	ug/L		0.00001	
Cyfluthrin, total	178	7/14/2021	0.03	ug/L		0.00024	
Esfenvalerate/Fenvalerate	178	7/14/2021	0.002	ug/L		0.00001	
Hyalella azteca	178	7/14/2021	0	%	yes		
Lambda cyhalothrin	178	7/14/2021	0.01	ug/L		0.00001	

## Los Banos Creek at China Camp Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Boron	178	7/14/2021	1600	ug/L		800	
E. Coli	178	7/14/2021	2419.6 >	MPN/100 mL		235	
Molybdenum	178	7/14/2021	11	ug/L		10	

## Marshall Road Drain near River Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.004	ug/L		0.00001	
E. Coli	178	7/14/2021	816.4	MPN/100 mL		235	
Hyalella azteca	178	7/14/2021	20	%	yes		
Lambda cyhalothrin	178	7/14/2021	0.002	ug/L		0.00001	

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## Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 7/12/2021 to 7/15/2021

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### Mud Slough Upstream of San Luis Drain

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.0005	ug/L		0.00001	
Boron	178	7/14/2021	3200	ug/L		800	
Lambda cyhalothrin	178	7/14/2021	0.0006	ug/L		0.00001	

### Newman Wasteway near Hills Ferry Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.002	ug/L		0.00001	
Cyfluthrin, total	178	7/14/2021	0.003	ug/L		0.00024	
E. Coli	178	7/14/2021	344.8	MPN/100 mL		235	
Lambda cyhalothrin	178	7/14/2021	0.0006	ug/L		0.00001	

### Poso Slough at Indiana Ave

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.001	ug/L		0.00001	
Lambda cyhalothrin	178	7/14/2021	0.001	ug/L		0.00001	

### Salt Slough at Lander Ave

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.0005	ug/L		0.00001	
Lambda cyhalothrin	178	7/14/2021	0.0004 DNQ	ug/L		0.00001	

### Salt Slough at Sand Dam

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.002	ug/L		0.00001	
Cyfluthrin, total	178	7/14/2021	0.0008	ug/L		0.00024	
Cypermethrin	178	7/14/2021	0.0004 DNQ	ug/L		0.00001	
Esfenvalerate/Fenvalerate	178	7/14/2021	0.0006 DNQ	ug/L		0.00001	
Lambda cyhalothrin	178	7/14/2021	0.0007	ug/L		0.00001	
Permethrin	178	7/14/2021	0.003 DNQ	ug/L		0.00001	

### San Joaquin River at Lander Ave

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Arsenic	178	7/14/2021	23	ug/L		10	
Bifenthrin	178	7/14/2021	0.0003 DNQ	ug/L		0.00001	
Lambda cyhalothrin	178	7/14/2021	0.0003 DNQ	ug/L		0.00001	

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## Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 7/12/2021 to 7/15/2021

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### Westley Wasteway near Cox Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	178	7/14/2021	0.01	ug/L		0.00001	
Cyfluthrin, total	178	7/14/2021	0.0005	ug/L		0.00024	
Esfenvalerate/Fenvalerate	178	7/14/2021	0.0008 DNQ	ug/L		0.00001	
Hyalella azteca	178	7/14/2021	23.33	%	yes		
Lambda cyhalothrin	178	7/14/2021	0.005	ug/L		0.00001	

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## Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 8/9/2021 to 8/11/2021

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### Blewett Drain at Highway 132

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Cypermethrin	179	8/10/2021	0.0005	ug/L		0.00001	

### Del Puerto Creek at Hwy 33

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	179	8/10/2021	0.001	ug/L		0.00001	

### Del Puerto Creek near Cox Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	179	8/10/2021	0.002	ug/L		0.00001	
E. Coli	179	8/10/2021	488.4	MPN/100 mL		235	
Lambda cyhalothrin	179	8/10/2021	0.001	ug/L		0.00001	

### Hospital Creek at River Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Boron	179	8/10/2021	890	ug/L		800	
E. Coli	179	8/10/2021	1986.3	MPN/100 mL		235	

### Ingram Creek at River Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	179	8/10/2021	0.005	ug/L		0.00001	
Cyfluthrin, total	179	8/10/2021	0.0007	ug/L		0.00024	
Hyalella azteca	179	8/10/2021	0	%	yes		
Lambda cyhalothrin	179	8/10/2021	0.01	ug/L		0.00001	

### Los Banos Creek at China Camp Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	179	8/10/2021	0.001	ug/L		0.00001	
Boron	179	8/10/2021	1700	ug/L		800	

### Marshall Road Drain near River Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	179	8/10/2021	0.001	ug/L		0.00001	

### Mud Slough Upstream of San Luis Drain

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	179	8/10/2021	0.0009	ug/L		0.00001	
Boron	179	8/10/2021	2000	ug/L		800	

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## Westside San Joaquin River Watershed Coalition

Water Quality Value Exceedances for the period of 8/9/2021 to 8/11/2021

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### Newman Wasteway near Hills Ferry Road

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	179	8/10/2021	0.003	ug/L		0.00001	
Cyfluthrin, total	179	8/10/2021	0.002	ug/L		0.00024	

### Poso Slough at Indiana Ave

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	179	8/10/2021	0.002	ug/L		0.00001	

### Salt Slough at Sand Dam

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Bifenthrin	179	8/10/2021	0.003	ug/L		0.00001	
Cyfluthrin, total	179	8/10/2021	0.002	ug/L		0.00024	

### San Joaquin River at Lander Ave

Analyte/Species	Event	Sample Date	Result	Units	Significant Toxicity	WQV Max	WQV Min
Ammonia as N	179	8/10/2021	0.75	mg/L		0.42	
Bifenthrin	179	8/10/2021	0.001	ug/L		0.00001	
Molybdenum	179	8/10/2021	18	ug/L		10	

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Telephonic Meeting of the  
Delta-Mendota Subbasin Coordination Committee

Monday, June 14, 2021, 9:30 AM

[Click here to join meeting](#)  
Call-in Number: +1 669-900-6833  
Meeting ID: 864 7092 0323  
Passcode: 925174

**Coordination Committee Members and Alternates Present**

Vince Lucchesi – Patterson Irrigation District/Northern Delta-Mendota Region  
Lacey McBride – Merced County/Central Delta-Mendota Region (Alternate)  
Jarrett Martin – Central California Irrigation District/SJREC  
Alejandro Paolini – San Luis Canal Company/SJREC  
Augie Ramirez – Fresno County  
Ric Ortega – Grassland Water District  
Ken Swanson – Grassland Water District (Alternate)  
Ross Franson – Aliso Water District (Alternate)

**San Luis & Delta-Mendota Water Authority Members Present**

John Brodie  
Lauren Neves  
Claire Howard – Provost & Pritchard

**Others Present**

Lauren Layne – Baker Manock & Jensen  
Anthea Hansen – Del Puerto Water District  
Kel Mitchell – Turner Island Water District  
Will Halligan – Luhdorff & Scalmanini  
Katie Durham – Provost & Pritchard  
Steve Stadler – San Luis Water District  
Ben Fenters – Central California Irrigation District  
Leslie Dumas – Woodard & Curran

**1. Call to Order/Roll Call**

Jarrett Martin/CCID called the meeting to order at 9:32 AM.

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

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

**3. Opportunity for Public Comment**

No public comment was shared.

4. Committee to Review and Take Action on Consent Calendar, Howard
  - a. Minutes
    - i. March 8, 2021 Telephonic Meeting of the Delta-Mendota Subbasin Coordination Committee
    - ii. March 29, 2021 Special Telephonic Meeting of the Delta-Mendota Subbasin Coordination Committee
  - b. Budget
    - i. April 2021 Budget to Actual Report
    - ii. Water Year 2020 Annual Report Budget/Expenses, Brodie

The Committee considered approval of the Consent Calendar as presented. Ric Ortega/Grassland provided the motion and Vince Lucchesi/PID seconded. The Committee voted by roll call; the motion was passed unanimously by those present.

John Brodie/SLDMWA provided an informational update on the Water Year 2020 Annual Report budget. John noted that Woodard & Curran agreed to write off charges from the postmortem analysis of the Water Year 2020 Annual Report development, which was originally charged to the Coordination Committee in a recent invoice.

5. Committee to Consider Approval of Optional Enhancements for the Delta-Mendota Subbasin Data Management System, Brodie

John Brodie/SLDMWA provided an overview of the proposed enhancements for the Subbasin's data management system (DMS). These enhancements were requested by GSA and GSP Group representatives based on use of the DMS to date for uploading monitoring data and preparing the Water Year 2019 and 2020 Annual Reports. These enhancements include:

- Allowing users to configure the Water Year within the DMS
- Converting water level data in the DMS to DWR's template to aide uploading
- Converting extraction and water use data to DWR's template to aide uploading
- Creating water level pop-up hydrographs for viewers to more easily track water level trends

The Committee considered approval of these enhancements as presented. Ric Ortega/Grassland provided the motion and Vince Lucchesi/PID seconded. The Committee voted by roll call; the motion was approved unanimously by those present.

6. Committee to Discuss Implementation Efforts, Brodie
  - a. Monitoring Activities and Reporting Responsibilities, Howard

The Committee discussed timelines for upcoming monitoring activities and reporting. Seasonal high water level data collected between February 1 – April 30 for the Subbasin's representative monitoring sites must be uploaded to the DWR SGMA Portal by July 1<sup>st</sup>. Sustainable management criteria (SMC) data are also required for representative water level monitoring sites by this date.

The Subbasin's water quality monitoring window started May 1<sup>st</sup> and ends August 31<sup>st</sup>. Groundwater quality samples must be collected at representative sites during this time period. These water level and water quality data must also be uploaded to the Subbasin's DMS, and will be incorporated into the next Annual Report. SLDMWA staff will continue to support coordination between GSP Group and DWR staff for finalizing data uploaded to the SGMA Portal.



**b. Well Permitting Discussions, Howard**

The Committee discussed well permitting processes, and noted that representatives from the Northern and Central Management Committees have continued to discuss well permitting processes within Stanislaus, Merced, and Fresno Counties. County representatives have relayed updates regarding potential or upcoming changes to their permitting and approval processes, and how this may affect GSAs.

The group noted the challenge of this process given that each County has a different procedure in place and is considering different timelines and/or potential changes moving forward. Many GSAs and GSP Groups within the Delta-Mendota Subbasin span more than one county, which adds need for greater coordination between GSA, GSP Group, and County staff for future well applications. The Committee also noted that the current dry year will likely bring urgency to this process.

**c. GSP Implementation Activities and Evaluation, Brodie**

John Brodie/SLDMWA introduced a discussion topic on GSP implementation activities within the Subbasin. John explained that this was first discussed at a recent Northern and Central Management Committees meeting. The Management Committee members reviewed potential opportunities to consider evaluating new groundwater uses within the Northern and Central Regions, and how these uses may impact the GSP's successful implementation.

The Coordination Committee discussed the current uncertainty of GSP implementation given that DWR hasn't released assessments of the Subbasin's six GSPs yet. Without this input, the Committee discussed the challenge of reviewing proposed projects and how new groundwater uses may affect implementation activities and DWR assessment. The Committee discussed potential pros and cons of reaching out to DWR for additional input on the GSP assessment process and timing for the Delta-Mendota Subbasin. Committee members shared general favor for seeking input on assessment timing from DWR rather than requesting detail on the GSP content that DWR may address.

**7. Committee to Discuss Special Projects, Brodie**

**a. Well Census and Inventory Projects, GSP Group Representatives**

GSP Group representatives shared updates on their well census and inventory efforts. Most GSP Groups have completed the bulk of their efforts and will wrap up their projects soon. The Northern and Central Regions' well census efforts are ongoing and include agency review of preliminary maps and ground-truthing. The Grassland GSP Group has compiled available well location and construction information and is also ground-truthing sites.

**b. Subbasin Subsidence Characterization Study, Brodie**

John Brodie/SLDMWA shared that the Subbasin's subsidence characterization study is moving forward. The GSI Environmental, Inc. (GSI) team has requested additional data to support the study. John noted that the contract with GSI provides assurances of confidentiality for any data shared for this project.

**8. Committee to Discuss Inter-basin Coordination Efforts, Brodie**

**a. Facilitation Support Services (FSS) Inter-basin Coordination Meeting, Brodie/Lucchesi/Martin**

Jarrett Martin/SLDMWA and Vince Lucchesi/PID shared a recap of recent inter-basin coordination meetings. These meetings have been facilitated by a team from Stantec and have included representatives from the Chowchilla, Madera, and Merced Subbasins. Recent meetings have focused on regional subsidence, with a focus on developing a shared understanding of a regional subsidence prioritization area and potential causes. Jarrett and Vince also noted that the group has highlighted SJREC's past success coordinating and addressing subsidence in the Red Top area.

**b. Review of Draft Tracy Subbasin GSP Chapters and Opportunity for Public Comment, Howard**

Claire Howard/P&P explained that draft chapters were recently released for the Tracy Subbasin GSP and are currently open for public comment. Claire noted that the Tracy Subbasin borders the far north end of the Northern & Central GSP area, particularly the DM-II and WSID GSAs. Claire reminded the Committee that past coordinated comment letters were posted to the DWR SGMA Portal on final GSPs submitted for the January 2020 deadline. Claire noted that if interested, the Committee can consider developing coordinated comment letters on the Tracy Subbasin GSP and other neighboring subbasins' GSPs once final versions are submitted to the SGMA Portal after the January 2022 deadline.

**9. Next Steps**

- The Committee discussed their interest in including an in-person option in future meetings for interested Coordination Committee members and key personnel. An online Zoom option will remain available for any additional staff, consultants, and members of the public.
- The Committee approved the optional DMS enhancements. SLDMWA staff will coordinate with Houston Engineering, Inc. to implement these in the DMS.
- Seasonal high water level data for representative monitoring sites and associated SMC data are due to the DWR SGMA Portal by July 1<sup>st</sup>.
- The Subbasin's water quality monitoring window for representative sites started May 1st and will close at the end of August.
- Subbasin representatives will continue to participate in inter-basin coordination meetings with representatives from the Chowchilla, Madera, and Merced Subbasins to discuss regional subsidence evaluation.

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

John Brodie/SLDMWA requested that Committee members update SLDMWA's Opti database with project descriptions and data. Updating project information in Opti will help prepare the Subbasin for upcoming grant application development.

Jarrett Martin/CCID noted updates from neighboring subbasins, including an allocation recently adopted by the Madera Subbasin and an extraction ramp-down effort in the Westside Subbasin.

**II. ADJOURNMENT**

Jarrett Martin/CCID adjourned the meeting at 10:38 AM.

IXC.

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

Thursday, August 26<sup>th</sup>, 2021, 10:00 AM

Click here to join Zoom meeting  
Call-in Number: +1-669-900-6833  
Meeting ID: 854 2754 4345  
Passcode: 367929

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

Management Committee and Central GSA Members and Alternates Present

Northern DM Region Management Committee

Anthea Hansen, Member/Alternate – Del Puerto and Oak Flat Water Districts  
Adam Scheuber, Alternate – Del Puerto Water District  
Bobby Pierce, Member – West Stanislaus Irrigation District  
Vince Lucchesi, Member – Patterson Irrigation District  
Walt Ward, Member – Stanislaus County County  
Maria Encinas, Member – City of Patterson

Central DM Region Management Committee

Randy Miles\*, Alternate – Eagle Field Water District  
Danny Wade\*, Member/Alternate – Fresno Slough Water District/Tranquillity Irrigation District  
Juan Cadena\*, Alternate – Mercy Springs Water District  
Aaron Barcellos\*, Member – Pacheco Water District  
Michael Linneman\*, Member – Panoche Water District  
Mike Wood\*, Member – San Luis Water District  
Steve Stadler\*, Alternate – San Luis Water District  
Augie Ramirez\*, Alternate – Fresno County  
Damian Aragona, Member – Widren Water District

\*Indicates representative, alternate, or 2<sup>nd</sup> alternate of the Central Delta-Mendota GSA

San Luis & Delta-Mendota Water Authority Representatives Present

John Brodie  
Joyce Machado  
Stewart Davis  
Claire Howard – Provost & Pritchard

Others Present

Leslie Dumas – Woodard & Curran  
Anona Dutton – EKI Environment & Water, Inc.  
Joe Hopkins – Provost & Pritchard  
Gabriel Delgado – Baker Manock & Jensen

1. **Call to Order/Roll Call**

Aaron Barcellos/Pacheco called the meeting to order at 10:05 AM.

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

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

3. **Opportunity for Public Comment**

No public comment was received.

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

- a. **Minutes for the July 29th, 2021 Joint Telephonic Meeting of the Northern and Central Delta-Mendota Region Management Committees and Central Delta-Mendota GSA**
- b. **June 2021 Budget to Actual Report**

No comments were shared on the July 29<sup>th</sup> meeting minutes. Joyce Machado/SLDMWA reviewed the June 2021 budget to actual report. Joyce shared that Funds 64 and 65 for the Northern and Central Regions, respectively, are trending positive. She also noted that a preliminary unaudited budget to actual report for Fiscal Year 2021 is included in the meeting materials. Joyce explained that once the Fiscal Year 2021 audit is complete, the audited summaries for Funds 64 and 65 will be used during the Fiscal Year 2023 budget preparation process.

The Committees considered approval of the consent calendar. Vince Lucchesi/PID provided the motion for the Northern Management Committee and Maria Encinas/Patterson seconded. The Northern Management Committee voted by roll call; the motion was passed unanimously by those present. Augie Ramirez/Fresno provided the motion for the Central Management Committee and Steve Stadler/SLWD seconded. The Central Management Committee voted by roll call; the motion was passed unanimously by those present.

5. **Committees to Authorize Submittal of Comment Letter on Draft Tracy Subbasin GSP and Formalize Process for Addressing Future Draft GSP Comment Letters, Brodie**

John Brodie/SLDMWA shared that the Tracy Subbasin, which borders the northern end of the Delta-Mendota Subbasin, released a draft version of their GSP. The public comment period for this draft GSP closes September 9<sup>th</sup>. John noted that another comment period will be available once the final GSP is submitted to DWR's SGMA Portal by the January 31, 2022 deadline. The Committees provided direction for John to develop a draft comment letter to share for feedback via email in compliance with the Brown Act. The Committees will provide input and confirmation on a final version prior to Bobby Pierce/WSID and Aaron Barcellos/Pacheco providing signatures as the Northern and Central Management Committee chairs.

6. **GSP Group Representatives Report from Subbasin Technical Working Group and Coordination Committee Meeting on August 11, 2021, Brodie/Lucchesi**

John Brodie/SLDMWA and Vince Lucchesi/PID provided a summary from the recent Technical Working Group and Coordination Committee meeting held on August 11<sup>th</sup>. This meeting was held with representatives from USBR and USGS to review recent progress on the Central Valley Hydrologic Model 2 – San Joaquin Basin (CVHM2-SJB) groundwater model. John and Vince

explained that this meeting provided an opportunity for Delta-Mendota Subbasin representatives to share feedback with USBR and USGS teams on data and processes used in the model development so far. Follow-up meetings will be scheduled with Subbasin representatives to review surface water diversion and reuse data used in the GSP development process that may refine the CVHM2-SJB model.

7. **Committees to Discuss DWR Review of Sustainable Management Criteria (SGMA Portal), Brodie**

John Brodie/SLDMWA provided an update on recent Subbasin data reporting. Each GSP Group uploaded sustainable management criteria (SMC) data to the SGMA Portal along with spring water level data for representative monitoring sites. DWR responded with some clarification regarding uploaded SMC data to ensure consistency between data in each GSP and the SGMA Portal's Monitoring Network Module. SLDMWA staff will continue to coordinate between DWR staff and GSP Group representatives to finalize this monitoring information.

8. **Committees to Discuss Recent Requests for Input/Data, Brodie**

a. **California Water Commission Survey: Water Trading**

b. **DWR Survey: GSP Funding Requests**

John Brodie/SLDMWA thanked the Committee members for sharing responses requested for recent surveys from the California Water Commission and DWR. He noted that input received was incorporated into the final survey responses.

c. **Water Levels from "Supplemental" Wells to Support Aquifer Contours (Annual Report)**

Leslie Dumas/W&C explained that the Committee members will receive a request to share water level data from supplemental monitoring sites. These data will be incorporated into the Water Year 2021 Annual Report. Leslie also requested input from the Committee members on the water level contour map process. Leslie noted that Ken D. Schmidt & Associates (KDSA) has supported the contour map process for the past two Annual Reports. Leslie requested input from the Committee members regarding future contour map development. The Committees expressed interest in maintaining continuity in the contour development process, and continuing to work with the KDSA team. Leslie noted that she will also confirm this approach with the Coordination Committee at the next meeting.

d. **OPTI Database (Project Descriptions) to Support Funding Requests**

John reminded the Committee members to update project descriptions and detail in the Opti database (<https://opti.woodardcurran.com/irwm/wsj/login.php>), which will be used to gather project information when preparing for upcoming grant funding opportunities.

9. **Well Permit Review Process, Howard/County Representatives**

Walt Ward/Stanislaus shared that Stanislaus County is awaiting review from their legal team for the proposed well permitting process. Walt also noted that he is working with DM-II GSA and Central California Irrigation District to review new well permit applications received in those areas. Anthea Hansen/DPWD expressed concern regarding placing this responsibility on GSAs. She noted that for the time being, the DM-II GSA is proceeding cautiously. Steve Stadler/SLWD echoed Anthea's concerns regarding GSA involvement in this process.

Walt also noted that the California State Supreme Court decision on discretionary and ministerial well permitting processes may affect CEQA requirements for new wells.

10. **Committees to Discuss 2021 GSP Implementation**  
a. **Three-Month Look-Ahead Schedule, Dutton**

Anona Dutton/EKI reviewed the three-month look-ahead schedule and noted new letters recently released by SWRCB on several GSPs. Anona clarified that these are different from the assessment letters that DWR will release, but that SWRCB has authority over SGMA enforcement.

Anona also noted that early 2022 will keep the Committee members busy with Annual Report development, anticipated responses to DWR comments on the submitted GSP, and new grant applications for the SGMA and IRWM programs.

b. **Tracking Tools, Dutton**

Anona reminded the Committees to complete the latest Tracking Tools for their GSA or member agency. Tracking Tool check-in meetings will be scheduled with Committee members to review monitoring and implementation efforts and to discuss experiences with the current dry year conditions.

c. **Water Quality Monitoring Activities and Status, Dumas**

Leslie Dumas/W&C reminded the Committees that the water quality monitoring window closes August 31<sup>st</sup>. Leslie requested that representatives share sample results with SLDMWA and Woodard & Curran staff once the agency receives the laboratory report.

d. **Interconnected Surface Water Monitoring Network Development, Dumas**

The Committees discussed identifying new sites for interconnected surface water monitoring, including the option of using future SGMA or IRWM funding to identify potential sites for nested well construction. Leslie noted that Technical Support Services (TSS) funding was used for one nested well site in the Central GSA, but that the TSS timing is delayed relative to the Northern and Central Regions' need for expanding the monitoring network. Leslie will coordinate with Vince Lucchesi/PID, Bobby Pierce/WSID, and Walt Ward/Stanslaus to identify potential sites for construction of new nested wells.

II. **Committees to Discuss Special Projects**  
a. **Well Census and Inventory Project, Howard/O'Leary**

Claire Howard/P&P noted that final check-in meetings with GSAs and member agencies in the Northern and Central Regions are being scheduled to review well location and construction data compiled by Gavin O'Leary.

b. **Subbasin Subsidence Characterization Study and Project Feasibility Determination, Brodie**

John Brodie/SLDMWA reminded the Committees that the GSI Environmental, Inc. (GSI) team leading the Subbasin's subsidence characterization study has requested any available pumping data, particularly from wells screened in the lower aquifer, to bolster their subsidence review.

12. Committees to Discuss Inter-basin Coordination Update, Brodie/Montgomery/Lucchesi  
a. Report on August 6th and 20th 2021 Meetings

Vince Lucchesi/PID and John Brodie/SLDMWA shared updates from recent Facilitation Support Services (FSS) inter-basin coordination meetings held with representatives from the Chowchilla, Madera, and Merced Subbasins and facilitated by a Stantec team. The regional area of focus for subsidence between these subbasins' borders is being finalized. Vince noted that Madera and Chowchilla Subbasins are taking a wait-and-see approach with subsidence, rather than proactively anticipating and addressing subsidence concerns. Representatives from the Delta-Mendota Subbasin are concerned about this approach because of potential ongoing regional subsidence impacts. Vince noted that the Northern and Central Regions can be used as an example for a potential path forward for the Chowchilla and Madera Subbasins for the Regions' efforts identifying well locations and extent of subsidence.

The next inter-basin coordination meetings are scheduled for September 1<sup>st</sup> and 15<sup>th</sup>.

13. Committees to Discuss Potential Funding Opportunities, Brodie

John Brodie/SLDMWA shared a summary of upcoming funding opportunities:

- DWR is offering a non-competitive funding program for critically-overdrafted subbasins. This program is anticipated to open early 2022.
- DWR is also offering a Small Community Drought Program, which is open for applications until December 29, 2023.
- Proposition 1 - Round 2 grant funding for the IRWM program will open in Spring 2022.
- USBR grants including the Water and Energy Efficiency Grant (WEEG) and Environmental Water Resources (EWR) are open until later this fall. WEEG requires a 50% match and the application deadline is November 3, 2021. The EWR grant requires a 25% match and is open until December 9, 2021.

John requested that Committee members add and update prospective projects in the Opti database.

14. Next Steps

- The Committees provided direction to John Brodie/SLDMWA to develop a draft comment letter in response to the Tracy Subbasin's draft GSP for submission by the September 9<sup>th</sup> comment window deadline. John will circulate the draft letter for feedback and confirmation with the Committees prior to the Committee chairs signing the letter.
- Committee members are requested to update project details in the Opti database (<https://opti.woodardcurran.com/irwm/ws/login.php>)
- Committee members are requested to complete their agency's Tracking Tool and provide availability to schedule a Tracking Tool check-in meeting.
- The water quality monitoring window closes August 31<sup>st</sup>. Committee representatives are reminded to share laboratory reports and chain of custody documentation once received.
- Additional meetings are being scheduled with agency representatives and Gavin O'Leary/P&P to review well census data results.
- The next inter-basin coordination meetings are scheduled for September 1<sup>st</sup> and 15<sup>th</sup>.

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

No topics were discussed under this item.

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16. Future Meetings

- a. Thursday, September 23rd, 2021 at 10:00 AM
- b. Thursday, October 28th, 2021 at 10:00 AM
- c. November & December, 2021 (TBD)

17. Conference with Legal Counsel – Existing Litigation

The Committees will meet in closed session to confer with legal counsel pursuant to Paragraph (1), Subdivision (d) of Government Code Section 54956.9.

*California Sportfishing Protection Alliance v. All Persons Interested in the Matter of the Validity of the Northern and Central Delta-Mendota Regions Groundwater Sustainability Plan, et al.*, Stanislaus County Superior Court, Case No. CV-20-001748 [Delta-Mendota Subbasin SGMA Challenge].

18. Report Out of Closed Session

No reportable action was taken in closed session.

19. ADJOURNMENT

Aaron Barcellos/Pacheco adjourned the meeting at 12:12 PM.



IX C.



## MEMORANDUM

TO: Delta-Mendota Subbasin Coordination Committee Members and Alternates

FROM: John Brodie, Water Resources Manager

DATE: September 9, 2021

RE: Summary of Coordination Committee Written Report Items – September 9, 2021

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### A. IMPLEMENTATION EFFORTS

#### i. Monitoring Activities and Reporting Responsibilities

GSP Group representatives successfully uploaded water level data to the DWR SGMA Portal by the July 1<sup>st</sup> deadline for data collected at representative monitoring sites during the 2021 seasonal high period (February 1 – April 30). This upload deadline also included the submission of sustainable management criteria (SMC) for representative water level monitoring sites. SLDMWA staff coordinated with GSP Group representatives and supporting staff to upload these data by the deadline.

DWR staff recently reviewed these submissions and provided responses to John Brodie as the Subbasin's point-of-contact. DWR provided comments on the Grassland GSP, Northern & Central Delta-Mendota Region GSP (NCDM GSP), and San Joaquin River Exchange Contractors GSP (SJREC GSP). SLDMWA staff coordinated with representatives from each of these three GSPs to confirm the suggested edits and questions received from DWR. No edits or questions were shared in response to the Aliso Water District GSP (Aliso GSP), Farmers Water District GSP (Farmers GSP), or Fresno County Management Areas A & B GSP (Fresno GSP).

#### ii. Well Permitting Discussions

County and GSA representatives have continued to discuss well permitting processes and how GSAs may be involved in permitting review. Within the NCDM GSP Group, representatives from Stanislaus, Merced, and Fresno Counties have provided updates at monthly meetings of the Northern and Central Management Committees.

Merced County held a workshop with GSA representatives in mid-August focused on review of proposed changes to the County's groundwater ordinance. This workshop provided an overview for avenues of GSA involvement in the application review process. The proposed ordinance would include GSA review of permit applications for wells within a given GSA's boundaries. This review would include providing a determination of consistency with the adopted GSP and regulating well through GSP implementation activities.

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iii. GSP Implementation Activities

The deadline to complete annual water quality sampling was August 31<sup>st</sup>. The deadline for uploading water quality data to the Subbasin's data management system (DMS) is October 31<sup>st</sup>. The window is now open for fall/seasonal low water level monitoring. Please make sure water level monitoring is completed by October 31<sup>st</sup>. These data must be uploaded to the SGMA Portal by January 1<sup>st</sup>.

iv. Upcoming Grant Funding Opportunities

DWR anticipates a non-competitive funding opportunity for all critically overdrafted subbasins, with funding expected at approximately January 1, 2022. Available funds can be used for both projects and planning. On the planning side, that includes making changes to GSPs in response to DWR required or recommended changes associated with GSP approval. This opportunity will be a part of the main discussion during the meeting.

DWR's Small Community Drought Program will provide immediate and short-term financial and technical support to small communities survive the current and future droughts. Applications will be accepted until 12/29/23 or until funds are exhausted. Irrigation districts, flood control districts, reclamation districts, and community services districts are among eligible entities to receive this funding.

Building Resilient Infrastructure and Communities (BRIC) and Flood Mitigation Assistance Programs are available via the Governor's Office of Emergency Services. They seek high-impact, neighborhood scale, natural hazard risk reduction that mitigates risk to critical infrastructure or achieves whole community risk-reduction. Deadline: 12/1/21.

Farm and Ranch Solid Waste Clean-up Abatement Program: to clean up illegal dumps on farm/ranch property. Deadline 11/11/21.

Water and Energy Efficiency Grants. This USBR program requires a 50% match and provides funding for projects that result in quantifiable water savings, implement renewable energy components, and support broader sustainability benefits. Deadline 11/3/21.

Environmental Water Resources Projects via the USBR. This opportunity has a 25% match requirement. This new program supports projects focused on environmental benefits that have been developed as part of a collaborative process to help carry out an established strategy to increase the reliability of water resources. The deadline is 12/9/21.

**B. SPECIAL PROJECTS**

i. Well Census and Inventory Projects

Aliso GSP: The Aliso Water District has successfully worked to match well completion reports to known well locations, and is working to confirm these findings with landowners. Moving forward the District will pursue filling any known data gaps by utilizing the available grant funding to video select wells.

NCDM GSP: The Northern and Central Regions' well census efforts have continued with GSA and member agency review of preliminary well maps. The consultant team has compiled and verified

available well completion reports. Wells near the San Joaquin River were identified as potential sites for the NCDM GSP's interconnected surface water monitoring network.

SJREC GSP: The San Joaquin River Exchange Contractors GSP Group is continuing to collect data on wells, but no known changes to well data at this time.

Farmers GSP: Confirm status in meeting; anticipate complete.

Fresno County GSP: Confirm status in meeting; anticipate complete.

Grassland GSP: Confirm status in meeting; anticipate complete.

ii. Subsidence Characterization Study

The GSI Environmental, Inc. (GSI) team has continued to compile and review data for the Subbasin's subsidence characterization study. Groundwater extraction data has been requested from GSAs, municipalities, and coordinating agencies to support the subsidence evaluation project. A Technical Working Group meeting will be held in mid-fall 2021 to review progress on the project to date.

iii. USBR/USGS CVHM2-SJB Modeling Efforts

GSP Group representatives and SLDMWA staff have met with USBR and USGS staff to review and provide feedback on the Central Halley Hydrologic Model 2-San Joaquin Basin (CVHM2-SJB) modeling efforts. USBR and USGS staff are striving to develop a model that is accurate of water use in the Subbasin to support GSP implementation. The most recent meeting was held September 3<sup>rd</sup>. This meeting included a discussion of the level of detail and understanding of water delivery and reuse within the Subbasin needed to refine the model for future use. USBR and USGS staff will aim to refine the model with additional data from the Common Chapter and individual GSPs and schedule a follow-up meeting with Subbasin representatives to review the updated model results.

**C. INTER-BASIN COORDINATION EFFORTS**

i. Facilitation Support Services (FSS) Inter-basin Coordination Progress

The inter-basin coordination group, consisting of representatives from the Chowchilla, Delta-Mendota, Madera, and Merced Subbasins, had a productive session discussing how to address subsidence in the agreed-upon San Joaquin Valley focus area. Facilitated meetings will occur less frequently while the various groups begin collecting more data, a need that all agreed must be met in order to better understand subsidence in the region. The Chowchilla and Madera Subbasins have identified significant obstacles to collecting some of the lower aquifer extraction data. Delta-Mendota Subbasin representatives offered to assist other subbasins in outlining data collection protocols and lessons learned.

The next steps will include formalizing an agreement on next steps among the FSS participants for the subsidence focus area project, and discuss interim actions and incentives as the group awaits data collection efforts. The frequency of meeting will be reduced to facilitate data collection.

Review of Neighboring Subbasins' Draft GSPs and Comment Process

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Agenda Item 8 - Summary of Written Report Items

Draft chapters and compiled GSPs are being released by neighboring subbasins in advance of the January 2022 deadline. The Tracy Subbasin, which borders the northern portion of the NCDM GSP, released a compiled draft GSP in August. The Northern and Central Management Committees decided to submit a comment letter in response to the draft Tracy Subbasin GSP. Additional opportunities for the Subbasin to comment will occur after it is submitted to DWR.

The Turlock Subbasin recently released a public draft of the water budget chapter for its GSP. The deadline for public comments to this chapter is September 30, 2021. Opportunity to submit comments on the entire GSP will occur once it is submitted to DWR for approval.

IX.C.

**Key Excerpts from SWRCB's August 2021 GSP Comment Letters  
in comparison to DWR's 3 June 2021 GSP Determination and Notification Letters, and  
Suggested Clarifications for the Northern & Central Delta-Mendota Region GSP**

This document provides a summary of key issues identified by the State Water Resources Control Board (SWRCB) in their 23 August 2021 comment letters on five additional Groundwater Sustainability Plans (GSPs) that were submitted to Department of Water Resources (DWR). The common issues identified by the SWRCB are added to our previous analysis of the comments made by DWR in their 3 June 2021 determination and notification letters<sup>1</sup> summarizing findings regarding four GSPs. This document also provides suggested revisions or clarifications to the Northern & Central Delta-Mendota Region GSP (NCDM Region GSP) in light of the DWR and SWRCB comments.

**COMMON THEMES**

Common themes articulated in the SWRCB letters that related to the technical aspects of the GSPs were generally consistent with DWR comments on the other GSPs, as follows:

**Water Levels:** The SWRCB strongly recommends that groundwater sustainability agencies (GSAs) conduct an independent analysis of the potential impacts of proposed sustainable management criteria (SMCs) on active domestic and public water supply wells (especially related to disadvantaged communities [DACs]) and implement a well mitigation program. SMCs that allow for a continued decline in groundwater levels, especially past the year 2040 when overdrafted basins are required to reach sustainability, are not considered sustainable or consistent with the Sustainable Groundwater Management Act (SGMA).

**Water Quality:** The GSP should outline the process the GSAs would use to decide whether GSP implementation caused or exacerbated a minimum threshold (MT) exceedance for water quality and take the "human right to water" legislation directly into account. All available data should be considered and if multiple constituents of concern (COCs) have been detected in a basin, the rationale for only developing SMCs for a select few COCs must be justified.

**Subsidence.** SMCs that allow for continued subsidence or a continued decline in groundwater levels, especially a decline in levels to below the Corcoran Clay, are not considered sustainable.

**Interconnected Surface Water (ISW):** The SWRCB generally felt that the GSAs had not sufficiently made the case that water levels could be used as a proxy for addressing ISW or sufficiently characterized the nature and extent of ISW issues or groundwater dependent ecosystems (GDEs). The SWRCB expects that an ISW monitoring network will include stream gauges.

**Projects and Management Actions (PMAs):** The SWRCB expressed concerns related to the likelihood of success of the planned PMAs, cautioned the GSAs on the intersection of water rights permitting with planned PMAs (e.g., for those projects that anticipate relying on new or amended surface water rights as a source of supply), strongly encouraged the GSAs to get involved in the well permitting processes, and encouraged incorporation of demand management into the PMA plan.

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<sup>1</sup> On 3 June 2021, DWR issued determination letters to the GSAs for two basins (the Santa Cruz Mid-County Basin and the 180/400-foot Aquifer Subbasin) approving the basins' GSPs, and issued notification letters to the GSAs for two other basins (the Paso Robles Area Subbasin and the Cuyama Basin), identifying deficiencies in the basins' GSPs and initiating consultation with the GSAs.

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**Stakeholder Engagement:** The SWRCB provided significant comments on stakeholder outreach and engagement (especially related to engagement of DACs and tribal interests). The SWRCB comments, however, did not address issues related to inter-basin or intra-basin coordination.

## DETAILED COMMENTS

Excerpts from the June 2021 DWR GSP review letters (provided in the original version of this attachment) are shown in *italics* font with grey highlighting with the particular comment letter identified by basin in parentheses. Excerpts from the August 2021 SWRCB GSP comment letters are shown in *italics* font with no highlighting, with the particular comment letter identified by basin in parentheses. Below each excerpt is an analysis of the NCDM Region GSP and recommendation(s) related to the anticipated receipt of similar comments by DWR and/or the SWRCB. Revised or added recommendations based on the recent SWRCB letters are shown in blue font.

### All Sustainability Indicators

#### Key Excerpts from DWR June 2021 GSP Review Letters

- *"The GSA's definition needs to include a description of the processes and criteria relied upon to define undesirable results and must describe the effect of undesirable results on the beneficial uses and users of groundwater. From this definition, the GSA establishes minimum thresholds, which are quantitative values that represent groundwater conditions at representative monitoring sites that, when exceeded individually or in combination with minimum thresholds at other monitoring sites, may cause the basin to experience undesirable results." (Cuyama, page 2)*
- *"GSA should describe the anticipated effects of the established minimum thresholds and undesirable results on the interests of beneficial uses and users and how the GSA determined that those thresholds would avoid undesirable results in the Basin." (Cuyama, page 4)*
- *"Through review of the Plan and public comments, the Department determines that the GSA adequately responded to comments that raised credible technical or policy issues with the Plan, sufficient to warrant approval of the Plan at this time." (Santa Cruz Mid-County, page 4; 180/400-Ft Aquifer, page 3)*
- *"Lastly, the Department's review considers the comments submitted on the Plan and evaluates whether the GSA adequately responded to the comments that raise credible technical or policy issues with the Plan." (180/400-Ft Aquifer, page 9 of DWR Staff Report)*

#### Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *"Parts of the GSPs narrative definition of an undesirable result are vague, making it difficult to assess how well the proposed MTs represent groundwater conditions that the GSAs plan to avoid..." (Chowchilla, page 5)*

#### General Suggestions Pertaining to All Sustainability Indicators

- Provide explicit description of the point at which effects from conditions become "significant and unreasonable", especially for the effects that are used to define Undesirable Results criteria, and provide a clear rationale for how the Minimum Thresholds are set to avoid those conditions.
- In the event that comments were received during the Public Draft GSP comment period and on the final adopted GSP, plan for and incorporate responses to those comments in any revisions to

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the GSP (i.e., either in response to DWR’s forthcoming determination letter or in the next five-year GSP update).

**Chronic Lowering of Groundwater Levels**

Key Excerpts from DWR June 2021 GSP Review Letters

- *“Clarify how the criteria defining when undesirable results occur in the Basin (i.e., 30 percent exceedance of minimum thresholds for two consecutive years) was established, the rationale behind the approach, and why it is consistent with avoiding the significant and unreasonable effects identified by the GSA.” (Cuyama, page 4-5)*
- *“...estimate the number and kinds of wells expected to be impacted at the minimum thresholds identified in the GSP.” (Cuyama, page 5)*
- *“...discussion should be supported using best available information such as using State or county information on well completion reports to analyze the locations and quantities of domestic wells and other types of well infrastructure that could be impacted by groundwater management when implementing the GSP.” (Paso Robles, page 3-4)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *“... strongly recommends that the GSAs conduct an independent analysis of the potential impacts of proposed MOs and MTs... on active domestic and public water supply wells... and consider how those effects compare to a GSA’s definition of an undesirable result related to declining groundwater levels. In addition, the GSAs should estimate and describe the population served by the wells... which are not protected at MTs.” (Chowchilla, page 4; Merced, page 4; Tulare Lake, page 3)*
- *“the GSAs should adjust MTs ...or otherwise mitigate for impacts to wells... the GSAs could develop and implement a well mitigation plan that would lessen the significance of the impact by replacing or repairing domestic or drinking water system wells impacted by groundwater level declines as a project or management action.” (Chowchilla, page 4; Merced, page 4; Tulare Lake, page 3)*
- *“The GSP should evaluate MTs set below the Corcoran Clay and consider whether the MTs are appropriate” (Chowchilla, page 3; Merced, page 3)*
- *“In some locations, the ... MOs [are] close to or deeper than the MTs, which are based on well depths...” (Merced, page 5)*
- *“it appears that ... the GSP allows for continuing groundwater level declines past the year 2040 when the subbasin is required to reach sustainability. The GSP also appears to allow for continued long-term loss of groundwater storage and subsidence. State Water Board staff finds that the GSP’s conclusion that overdraft is sustainable is not consistent with the Sustainable Groundwater Management Act (SGMA)...” (Tulare Basin, Page 1)*

Current NCDM GSP Approach	Suggested Clarifications
<p><b>Effects on Beneficial Users (Section 6.3.1.1.4):</b>                      “Dewatering of wells, inelastic land subsidence that can impact land use and water conveyance capacity, surface water depletions that can impact interconnected waterways, impact to productive</p>	<ul style="list-style-type: none"> <li>• Define exact quantities of when the listed effects become “significant and unreasonable”, especially for the effects that are used to define Undesirable Results criteria.</li> </ul>

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<p>agriculture, increased pumping costs and need to dig deeper wells for municipalities, and potential needs to seek new water sources”.</p>	<ul style="list-style-type: none"> <li>• Consider developing a well mitigation plan that would lessen the impact of declines in groundwater levels by replacing or repairing domestic or drinking water system wells impacted by groundwater level declines.</li> </ul>
<p><b>Definition of Undesirable Results (Section 6.3.1.1.2):</b>  “...Conditions are deemed ‘significant and unreasonable’, when groundwater elevations drop below the site-specific minimum threshold at 40 percent of representative monitoring wells in a principal aquifer in the Northern and Central Delta-Mendota Regions concurrently over a given year (7 out of 17 wells in the Upper Aquifer and/or 8 out of 18 wells in the Lower Aquifer)”.</p>	<ul style="list-style-type: none"> <li>• Clarify how the definition of the Undesirable Results will avoid specified “significant and unreasonable effects” (e.g., have to tie the 40% threshold back to the quantitative analysis of potential well impacts or subsidence and the effects on beneficial users).</li> </ul>
<p><b>Setting Minimum Thresholds (Section 6.3.1.2):</b>  The Minimum Thresholds are “... set as the hydrologic low for wells perforated in the Upper Aquifer (above the Corcoran Clay) and 95 percent of the hydrologic low for wells perforated in the Lower Aquifer (below the Corcoran Clay) over the available hydrographs on record”.</p> <p>“Significant impacts are not anticipated to occur for drinking water users. Including domestic well users” when 2015 levels (historic lows) are used as minimum thresholds”.</p>	<ul style="list-style-type: none"> <li>• Clarify what is meant by “95 percent of the hydrologic low”, as it relates to the setting of Minimum Thresholds for wells perforated in the Lower Aquifer (below the Corcoran Clay).</li> <li>• Provide quantitative justification for the MTs. For example, perform/describe a <u>well impact analysis</u> to estimate how many wells could be dewatered or how much subsidence could occur at the MTs. This should be coupled to the definition of “significant and unreasonable effects” that constitute an Undesirable Result in terms of effects on beneficial users.</li> <li>• Confirm that the MTs are set at levels that would not allow water levels to fall below the Corcoran Clay layer. If the MTs would allow water levels to fall below the Corcoran Clay, consider raising the MTs to a higher level, above the Corcoran Clay.</li> </ul>
<p><b>Measurable Objectives and Interim Milestones (Section 6.3.1.3)</b></p> <p>“The measurable objective is set at the lowest value of three parameters: the average historic seasonal high over the available hydrograph, Spring 2012 seasonal high, or Spring 2017 seasonal high.”</p>	<ul style="list-style-type: none"> <li>• Consider re-evaluating the SMCs for the RMS wells where MOs are set very close to the MTs (e.g., wells 03-003, 01-004).</li> </ul>

**Reduction of Groundwater Storage**

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *“it appears that ... the GSP allows for continuing groundwater level declines past the year 2040 when the subbasin is required to reach sustainability. The GSP also appears to allow for continued long-term loss of groundwater storage and subsidence. State Water Board staff finds that the*



*GSP's conclusion that overdraft is sustainable is not consistent with the Sustainable Groundwater Management Act (SGMA)..." (Tulare Basin, page 1)*

- *"The GSP uses the groundwater elevation MTs developed to manage for decreasing groundwater levels as a proxy [for decrease in groundwater storage] ...; however, the GSP does not draw a direct link between the SMC for declining groundwater levels and undesirable results related to depletions of [groundwater storage]..." (corollary to ISW arguments presented in Merced, page 7; Eastern San Joaquin, page 5)*

Current NCDM GSP Approach	Suggested Clarifications
<p><b>Causes of Undesirable Results (Section 6.3.2.1.3):</b>                      "... dramatic increases in reliance on groundwater, severe drought, or other major changes in groundwater management over time".</p> <p>"... regulatory requirements placed on CVP and SWP operations, as well as instream flow requirements on the San Joaquin River and its tributaries".</p>	<ul style="list-style-type: none"> <li>• Since Undesirable Results are being tied to groundwater levels, the causes listed would be expected to be the same causes as for Chronic Lowering of Groundwater Levels rather than this new/different set of causes (or at least add this to the set of causes for Chronic Lowering of Groundwater Levels).</li> </ul>
<p><b>Effects on Beneficial Users (Section 6.3.2.1.4):</b>                      "...undesirable effects could include encroachment on the groundwater reserved as a drought buffer, increased cost of pumping as deeper wells are required to access groundwater, and reduction in beneficial uses".</p>	<ul style="list-style-type: none"> <li>• Be more specific in defining when effects of conditions related to Reduction of Groundwater Storage become "significant and unreasonable", especially any effects that are distinct from those related to Chronic Lowering of Groundwater Levels. Without specific metrics, it is difficult to assess what magnitude of impacts is considered reasonable.</li> </ul>
<p><b>Setting Minimum Thresholds (Section 6.3.2.2):</b>                      "This GSP uses groundwater levels minimum thresholds as a proxy for the reduction of groundwater storage sustainability indicator".</p>	<ul style="list-style-type: none"> <li>• Provide technical support for the argument of correlation between groundwater levels and groundwater storage and justifying the use of MTs for Chronic Lowering of Groundwater Levels as a proxy for Reduction of Groundwater Storage, with specific consideration of the metrics associated with the definitions of MTs and Undesirable Results.</li> </ul>

**Degraded Water Quality**

Key Excerpts from DWR June 2021 GSP Review Letters

- *"SGMA and the GSP Regulations do not require a GSP to address undesirable results associated with degraded water quality that occurred before, and have not been corrected by, January 1, 2015." (Cuyama, page 7)*
- *"The Department received comments that raise credible technical issues regarding groundwater quality data that apparently were not considered when developing the GSP but are available to the public and likely, in the opinion of Department staff, to alter the GSA's assessment of the Basin conditions. The GSA should coordinate with interested parties that submitted comments, in*

*particular with the Regional Water Quality Control Board, to obtain best available information regarding basinwide water quality.” (Cuyama, page 8)*

- *“(S)taff find that the approach to focus only on water quality impacts associated with GSP implementation, i.e., GSP-related projects, is inappropriately narrow. Department staff recognize that GSAs are not responsible for improving existing degraded water quality conditions. GSAs are required; however, to manage future groundwater extraction to ensure that groundwater use subject to its jurisdiction does not significantly and unreasonably exacerbate existing degraded water quality conditions. ... the analysis should be on whether groundwater extraction is causing the degradation in contrast to only looking at whether a specific project or management activity results in water quality degradation. Department staff recommend that the SVBGSA coordinate with the appropriate water quality regulatory programs and agencies ... to understand and develop a process for determining when groundwater management and extraction is resulting in degraded water quality in the Subbasin.” (180/400-Ft Aquifer, page 26-27)*
- *“Define what constitutes “average hydrogeologic conditions” and how the “long-term average over all hydrogeologic conditions” will be calculated for the consideration of undesirable results for reduction of groundwater storage and depletions of interconnected surface water.” (180/400-Ft Aquifer, page 37)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters:

- *“The GSP states that only groundwater quality degradation caused by GSP implementation will constitute a MT exceedance contributing to an undesirable result but does not explain how causation will be assessed ... The GSP should outline the process the GSAs would use to decide whether GSP implementation caused or exacerbated an MT exceedance for water quality. In addition, the GSP should provide the data supporting its conclusions...” (Chowchilla, page 6; Merced, page 6; Eastern San Joaquin, page 4; Tulare Lake, page 5)*
- *“In deciding which water quality constituents to consider when setting SMC, a GSA should consider the best available water quality information for the basin...” (Chowchilla, page 6; Eastern San Joaquin, page 3; Tulare Lake, page 6)*
- *“If data indicate the contaminant is relatively widespread in the subbasin, the GSAs should develop SMCs ...” (Chowchilla, page 6; similar statements in Eastern San Joaquin, page 3, and Merced, page 5)*
- *A GSA should particularly consider whether any groundwater quality constituents in the basin may impact the state’s policy of protecting the right of every human being to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes (Water Code, §106.3).” (Chowchilla, page 7; Merced, page 5; Eastern San Joaquin, page 3; Tulare Lake, page 4)*
- *“The GSP sets the MT concentrations for degraded water quality at 1000 milligrams per liter (mg/L) TDS... For TDS in drinking water, the secondary maximum contaminant level (SMCL) is 500 mg/L – the recommended maximum contaminant level – and the upper limit SMCL is 1,000 mg/L. Staff recommends that the GSP further discuss consideration of drinking water users in setting the GSP’s water quality SMC.” (Eastern San Joaquin, pages 3-4)*

Current NCDM GSP Approach	Suggested Clarifications
<p><b>Undesirable Results Causes (Section 6.3.3.1.3):</b>                      "TDS, nitrate as N, and boron have been identified as constituents of concern and are largely the result of non-point sources".</p> <p>"Elevated TDS and boron concentration are primarily a result of a combination of land use practices, the geochemistry of the Coast Range rocks, recharge derived from the Coast Range streams, dissolvable materials within the alluvial fan complexes, and the naturally poor-draining conditions which tends to result in accumulation of these constituents".</p> <p>"Elevated nitrate as N is largely the result of agricultural applications of fertilizer along with leaching from naturally-occurring alluvium..."</p> <p>"Similarly, elevated boron concentrations are also the result of applied pesticides and accumulation in areas of poor drainage".</p>	<ul style="list-style-type: none"> <li>• Provide further explanation of how these causes relate to groundwater management activities under the purview of the GSAs, to tie in better with the justification of the MT and Undesirable Results definitions.</li> <li>• The GSP should outline the process the GSAs would use to decide whether GSP implementation caused or exacerbated an MT exceedance for water quality.</li> </ul>
<p><b>Undesirable Results Justification (Section 6.3.3.1.1)</b>                      "Total Dissolved Solids (TDS), nitrate ..., and boron ... were selected based on available data, the potential to impact existing or future groundwater use, the ability to address groundwater quality impacts through projects and/or management actions, and the source of the constituent".</p> <p>"While other constituents of concern are known to exist in the Delta-Mendota Subbasin (such as arsenic, selenium, and hexavalent chromium), concentrations of these constituents do not appear to be linked to groundwater elevations or other groundwater-related management activities".</p>	<ul style="list-style-type: none"> <li>• Be more specific in defining when the listed effects become "significant and unreasonable", especially for the effects that are used to define Undesirable Results criteria.</li> <li>• The NCDM GSP (Section 5.3.5) states that other constituents of concern include arsenic, selenium, and hexavalent chromium are present in the NCDM Region but that they are naturally occurring and "do not appear to be linked to groundwater elevations ... [and] ... (t)here are no specific projects and/or management practices that can be implemented to mitigate for these constituents (other than groundwater treatment ... [and] therefore, the constituents are not considered manageable as part of this GSP." Suggest providing additional citation to datasets, sources and analysis that demonstrate the lack of correlation described above.</li> <li>• Consider directly addressing the human right to water (Water Code, §106.3).</li> </ul>
<p><b>Setting Minimum Thresholds (Section 6.3.3.2):</b>                      "The minimum thresholds for the degraded water quality sustainability indicator are set as the upper Secondary MCL for TDS (1,000 mg/L)... [MCLs] ... or current groundwater quality as of December 2018 for both the Upper Aquifer and Lower Aquifer if the listed MCL or WQO is already exceeded".</p>	<ul style="list-style-type: none"> <li>• The provision of SGMA related to not requiring GSPs to address "pre-existing" undesirable results (California Water Code § 10727.2(b)(4)) applies to undesirable results that existed as of January 1, 2015, not December 2018, and thus the use of the greater of MCLs, WQOs, or observed levels as of December 2018 may not be acceptable. Suggest revising this component of the Minimum</li> </ul>

	<p>Thresholds definition to refer to 1 January 2015 rather than December 2018.</p> <ul style="list-style-type: none"> <li>The SWRCB questioned the use of the upper Secondary MCL (1,000 mg/L) as the minimum threshold for TDS. Consider providing a stronger argument for using 1,000 mg/L that considers the impacts to drinking water users.</li> </ul>
<p><b>Undesirable Results Criteria (Section 6.3.3.1.2):</b>          "Groundwater quality exceeds Maximum Contaminant Levels (MCLs) or water quality objectives (WQOs) for TDS, nitrate, or boron over three (3) consecutive sampling events in non-drought years, or additional degradation of current groundwater quality where current groundwater quality exceeds the MCLs or WQOs".</p>	<ul style="list-style-type: none"> <li>Provide explicit definition of "non-drought years" so that conditions under which an Undesirable Result is possible are clearly defined.</li> <li>Unclear how many wells in the Representative Monitoring Network would have to exceed the MT criteria before there was an Undesirable Result. Provide quantitative justification for the definition of "significant and unreasonable effects" that constitute an Undesirable Result in terms of effects on beneficial users.</li> </ul>

**Land Subsidence**

Key Excerpts from DWR June 2021 GSP Review Letters

- "Department staff believe there is sufficient data to indicate the potential of [interconnected surface water]<sup>2</sup> in the Subbasin that warrants and requires setting initial sustainable management criteria that may be reevaluated and potentially modified as new data become available. Not developing criteria limits the ability of Department staff to assess whether the Subbasin is being, or will be, sustainability managed within 20 years." (Paso Robles, page 8)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- "If water levels are allowed to drop below the Corcoran Clay, this would result in the near-surface unconfined aquifer being completely dewatered in this area. Additionally, subsidence could occur due to dewatering of the clays." (Chowchilla, page 3; Merced, page 3)*

Current NCDM GSP Approach	Suggested Clarifications
<p><b>Setting Minimum Thresholds (Section 6.3.5.2):</b>            For the WSID-PID MA: "Acceptable loss in distribution capacity (as based on a future capacity study) due to inelastic land subsidence resulting from groundwater pumping. Numerical values for this criterion to be determined based on data collection between 2020 and 2025".</p>	<ul style="list-style-type: none"> <li>Not setting any MTs for Land Subsidence in the WSID-PID MA (i.e., having them to-be-determined [TBD]) may not be acceptable to DWR. Suggest providing some interim MT that could be refined in the future.</li> <li>Explain in greater detail how the data to be collected between 2020 and 2025 (i.e., the capacity study) will be used to develop MTs for Land Subsidence.</li> </ul>

<sup>2</sup> While the DWR comment excerpt shown here is related to Interconnected Surface Water, the same logic would presumably also apply to Land Subsidence.

	<ul style="list-style-type: none"> <li>• Confirm that the groundwater level MTs are set at levels that would not allow water levels to fall below the Corcoran Clay.</li> </ul>
<p><b>Undesirable Results Criteria (Section 6.3.5.1.2):</b> For the WSID-PID MA: "Significant impacts occur to laterals from differential settlement that reduces the ability to deliver surface water supplies".</p>	<ul style="list-style-type: none"> <li>• Specify what amount of capacity reduction in the WSID-PID MA would be considered "significant and unreasonable". Without specific metrics, it is difficult to assess what magnitude of impacts is considered reasonable.</li> </ul>

**Depletions of Interconnected Surface Water**

Key Excerpts from DWR June 2021 GSP Review Letters

- *"If the GSAs cannot provide a sufficient, evidence-based justification for the absence of interconnected surface water, then they should develop sustainable management criteria, as required in the GSP Regulations, 41 based on best available information and science." (Paso Robles, page 8)*
- *"Department staff find that the sustainable management criteria currently presented in the GSP (i.e., not defining and establishing criteria) is not commensurate with the level of understanding of the basin setting." (Paso Robles, page 7)*
- *"If data are not available to support evaluation of the effects of established minimum thresholds on environmental uses and users, the GSA should clarify the strategy, mechanism, and timeline for acquiring that data and incorporating that data into management of the Basin." (Cuyama, page 5)*
- *"The Plan explains that, due to uncertainty in surface water-groundwater modeling and the complexities involved with determining stream depletions due to groundwater use, the Basin will use shallow near stream groundwater levels as proxy for minimum thresholds of depletions of interconnected surface water. ... The Plan recognizes the limited monitoring data as a data gap and discusses the complexities of significantly correlating stream depletions and shallow groundwater levels. ... (T)he Plan states that to better characterize interconnections between surface water and groundwater, additional monitoring of shallow groundwater levels is needed in the upper reaches of Soquel Creek and on other creeks that indicate hydraulic connectivity to groundwater. ... Department staff also believe the MGA uses the best information and science available at the time of Plan development to understand hydraulic connectivity of surface water in the Basin and proposes actions to address the data gaps that appear reasonable." (Santa Cruz Mid-County, page 24-25 of DWR Staff Report)*

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *"The GSP identifies interconnected stream reaches through numerical modeling but does not adequately characterize the locations, quantity, and timing of interconnected surface water (ISW) depletions." (Merced, page 6)*
- *The GSP uses the groundwater elevation MTs developed to manage for decreasing groundwater levels as a proxy to also manage depletions of ISW in the Merced River; however, the GSP does not*

*draw a direct link between the SMC for declining groundwater levels and undesirable results related to depletions of ISW.” (Merced, page 7; Eastern San Joaquin, page 5)*

- *“State Water Board staff recommends that shallow groundwater level MTs for depletions of ISW be supported by considerations of the locations, quantity, and timing of depletions and impacts to beneficial users.” (Eastern San Joaquin, page 5)*
- *“Staff recommends the GSAs develop additional ISW monitoring sites in a timely manner, especially along the Merced and San Joaquin Rivers, and set meaningful SMC for depletions of ISW.” (Merced, page 7)*
- *“...the GSP also acknowledges data gaps and uncertainty regarding the hydraulic connectivity between shallow groundwater, deep groundwater and surface water. State Water Board staff recommends that the GSAs use data from additional shallow groundwater wells to clarify the Hydrogeologic Conceptual Model...if the additional data does not support the use of deeper groundwater elevations as a proxy for depletions of ISW, then State Water Board staff recommends that the GSP establish Sustainable Management Criteria based on the volume, rate, and timing of surface water depletions caused by groundwater pumping.” (North and South Yuba, page 3-4)*

Current NCDM GSP Approach	Suggested Clarifications
<p><b>Undesirable Results Definition (Section 6.3.6.1.2):</b>                      “... when interconnected stretches of surface water are identified and a significant increase in the depletions of surface water is occurring as a result of groundwater pumping”.</p> <p>“The percent increase in depletions considered significant, identified herein as ‘X’, is to be determined from monitoring data to be collected between 2020 and 2025 and associated analysis of these data”.</p>	<ul style="list-style-type: none"> <li>• Provide quantitative definition of when effects become “significant and unreasonable”. Without specific metrics, it is difficult to assess what magnitude of impacts is considered reasonable.</li> </ul>
<p><b>Minimum Thresholds Definition (Section 6.3.6.2):</b>                      “An X percent increase in surface water depletions along interconnected stretches of surface water as a result of groundwater pumping, where ‘X’ is the present increase in depletions to be determined from monition data collected between 2020 and 2025 and associated analyses of these data”.</p>	<ul style="list-style-type: none"> <li>• Having MTs for Depletion of Interconnected Surface Water be to-be-determined (TBD) may not be acceptable to DWR. Suggest providing some interim MTs that could be refined in the future.</li> <li>• A strong technical case must be made that groundwater levels can be used as a proxy for setting SMCs for Interconnected Surface Water.</li> </ul>
<p><b>Justification of Minimum Thresholds (Section 6.3.6.2):</b>                      “Data collected from wells within the depletions of interconnected surface water monitoring network and stream gauges located along the San Joaquin River between 2020 and 2025 will be analyzed to determine the location, timing, and quantity of depletions over reaches of interconnected surface water within and/or adjoining the Northern and Central Delta-Mendota Regions”.</p>	<ul style="list-style-type: none"> <li>• Given that the required infrastructure does not exist at this point, the GSAs will not be able to demonstrate that they collected data beginning in 2020 that will be used to develop MTs for Depletions of Interconnected Surface Water.</li> <li>• The GSAs should continue to prioritize development of the ISW monitoring network to enable collection of data to support SMC development, including wells and stream gauges.</li> </ul>

**Water Budget**

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *“Because the GSP is required to use a 50-year planning horizon, staff recommends the [GSAs] incorporate strategies in the GSP that anticipate potential changes to the subbasin-wide water budget from Bay-Delta Plan implementation...” (Eastern San Joaquin, page 8; Merced, page 8)*

Current NCDM GSP Approach	Suggested Clarifications
The GSP does not mention the Bay-Delta Plan update or consider it in the water budget.	<ul style="list-style-type: none"> <li>• Consider the Bay-Delta Plan update in the water budget section of the GSP and how it could affect the availability of surface water and the water budget within the GSP area.</li> </ul>

**Projects and Management Actions**

Key Excerpts from SWRCB August 2021 GSP Comment Letters

- *“Implementing some of the projects identified in the GSP may require new or amended water rights. If a project would rely on existing water rights, the GSAs should identify the water right identification numbers and other relevant details. It may be unreasonable for the GSP to assume that projects that currently lack adequate water rights for implementation can obtain either new water rights or modifications to existing water rights within a timeframe that will allow the project to contribute to the GSP achieving sustainability.” (Chowchilla, page 7; Merced, page 10)*
- *“The GSP should also identify alternative groundwater management strategies to achieve sustainability (e.g., demand reduction), if anticipated water supplies such as purchases or new or amended water rights are unsuccessful. This would ensure the GSAs can effectively evaluate when they should move towards implementing such contingency projects or management actions if primary projects or management actions are not implemented on projected timelines. To this end, the GSP should also identify well-developed demand management options with clearly defined triggers in the event that proposed supply augmentation volumes are not fully achieved.” (Chowchilla, page 8)*
- *“The GSP lacks specific information regarding how the GSAs will evaluate new permits, address possible impacts from new permits, or work with the county to address concerns. As encouraged by the Sustainable Groundwater Management Act (SGMA), GSAs should request counties forward permit requests for new wells, for enlarging of existing wells, or for reactivation of abandoned wells” (Chowchilla, page 6; Merced, page 9). “State Water Board staff recommends that GSAs work with county governments to encourage alignment between the GSP and county well permitting programs.” (Tulare Basin, Page 4)*

Current NCDM GSP Approach	Suggested Clarifications
<p><b>Increasing GSA Access to and Input on Well Permits (Section 7.1.1.2.3)</b>                      “Under this management action, the Counties would develop and/or change internal policies associated</p>	<ul style="list-style-type: none"> <li>• The GSAs should continue to prioritize the development of a process to evaluate new well permits and address possible impacts from new</li> </ul>

with well permitting to include consultation with and consideration of input from GSAs relative to if and where a proposed well would be located”.	wells.
<b>Projects and Management Actions (Section 7.1)</b> SLDMWA GSP mentions existing water rights that are relevant for projects, but does not provide water right identification numbers or the timing and uncertainties of obtaining new rights or modifying existing ones.	<ul style="list-style-type: none"> <li>Clarify whether water rights are required for projects. If existing water rights are required, specify the identification number. If new or modified rights would be required, discuss how obtaining water rights impacts the feasibility and timeframe of the project.</li> </ul>

### Stakeholder Engagement

#### Key Excerpts from SWRCB August 2021 GSP Comment Letters

- “The GSP should be more explicit about how the concerns of local beneficial users, particularly disadvantaged communities reliant on groundwater, and other stakeholders were integrated into the development of SMC and monitoring networks and selection of RMS and projects and management actions.” (Chowchilla, page 9; Merced, page 11; Tulare Lake, page 9)
- “The GSP states that no California Native American Tribes are present in the subbasin; however the GSP does not describe the GSAs’ process for identifying or reaching out to Tribes with potential interests in groundwater management in the subbasin...The GSP should elaborate on the GSAs tribal engagement effort.” (Chowchilla, page 9; Merced, page 11)

Current NCDM GSP Approach	Suggested Clarifications
SLDMWA GSP describes engagement for SMC development but lacks description on how beneficial users were integrated into RMS selection, monitoring network development (Section 7.2.5.1.1), and projects and management actions (Section 7.1).	<ul style="list-style-type: none"> <li>Add descriptions on how beneficial users were integrated into RMS selection and monitoring network development (Section 7.2.5.1.1), and Projects/Management Actions (Section 7.1).</li> </ul>
<b>Regional Economic Issues and Trends (Section 2.1.2.6)</b> “Note that according to the U.S. Department of the Interior Indian Affairs, as of January 2017 there are no listed recognized tribes within the Region”.	<ul style="list-style-type: none"> <li>Even though no Tribes exist within the basin, suggest describing any outreach or effort that was made to involve Tribes that have potential interests in the basin.</li> </ul>

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IXC.

# SUBMISSION DETAILS

Back

## Submission Details:

<b>Grant Tracking Number:</b> GRANT13479875	<b>UEI:</b> RPZJYHFAX2E4
<b>Submission Method:</b> Workspace – WS00791427	<b>AOR Name:</b> Adam J Scheuber
<b>Funding Opportunity Number – Title:</b> R22AS00020 – WaterSMART Drought Response Program: Drought Resiliency Projects for Fiscal Year 2022	<b>Application Filing Name:</b> Del Puerto Water District
<b>CFDA:</b> 15.514 – Reclamation States Emergency Drought Relief	<b>Requested Amount:</b> \$975,200
<b>Competition ID – Title:</b> R22AS00020 – WaterSMART Drought Response Program: Drought Resiliency Projects for Fiscal Year 2022	<b>Agency Tracking Number:</b> R-DO-2022-001224
<b>Opportunity Package ID:</b> PKG00268364	<b>Status:</b> Agency Tracking Number Assigned
<b>Date/Time Received:</b> Oct 05, 2021 04:36:08 PM EDT	<b>Status Date/Time:</b> Oct 05, 2021 05:43:48 PM EDT

## Submission Forms/Attachments Received:

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Form Name/Attachment File Name	File Size
<b>▼FORM: Application for Federal Assistance (SF-424) [V3.0]</b>	
SF424_3_0-1239-Item 14 - Areas affected by project Attachment.docx	12.9 KB
<b>▼FORM: Attachments [V1.2]</b>	
AttachmentForm_1_2-ATT1-1234-WaterSMART Drought Response Program Grant Application_DPWD Groundwater Well Remote Telemetry Program_Final_100521.pdf	1.7 MB
AttachmentForm_1_2-ATT2-1235-Appendix A - DPWD Local Hazard Mitigation Plan.pdf	3.2 MB
AttachmentForm_1_2-ATT3-1236-Appendix B Letter of Support from DM-II GSA.pdf	304.0 KB
AttachmentForm_1_2-ATT4-1237-Appendix C - Official Resolution.pdf	172.7 KB
AttachmentForm_1_2-ATT5-1238-Appendix D - Letter of Support from District Water Users.pdf	328.9 KB
<b>FORM: Budget Information for Non-Construction Programs (SF-424A) [V1.0]</b>	
<b>FORM: Assurances for Non-Construction Programs (SF-424B) [V1.1]</b>	
<b>FORM: Assurances for Construction Programs (SF-424D) [V1.1]</b>	
<b>FORM: Grants.gov Lobbying Form [V1.1]</b>	

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