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# Draft GSP Public Comments

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Merced Irrigation-Urban GSA  
Merced Subbain GSA  
Turner-Island Water District GSA-1

Joint Board of Directors Meeting  
September 18, 2019

Image courtesy: Veronica Adrover/UC Merced



# Agenda

1. Call to order
2. Overview of GSP Development to Date
3. Public Engagement Process
4. Summary of Public Comments Received (*Opportunity for public comment following each topic*)
  - a) Water Level
  - b) Subsidence
  - c) Demand Management
  - d) Allocation Framework
  - e) Water Quality
  - f) Groundwater Dependent Ecosystems
  - g) Stakeholder Outreach
5. Next Steps in GSP Adoption Process
6. Update on Progress of SDAC Grant Projects
7. Action Item: Prop 68 Funding Opportunity
8. Public Comments
9. Meeting Adjournment



Image courtesy: Veronica Adrover/UC Merced





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# GSP Development To Date

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Image courtesy: Veronica Adrover/UC Merced



# Sustainable Groundwater Management Act Overview

- Merced Groundwater Subbasin is in a state of critical overdraft
- SGMA requires a Groundwater Sustainability Plan by Jan 1, 2020 for sustainable groundwater management of the basin within a 20-year timeframe

Image courtesy: Veronica Adrover/UC Merced

# Sustainable Groundwater Management Act Overview

- **SGMA has two main focus areas:**
  - Halt the overdraft by “balancing the water budget” (basin inputs = basin outputs)
  - Establish thresholds for six sustainability indicators to prevent “undesirable results”



Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply



Significant and unreasonable degraded water quality



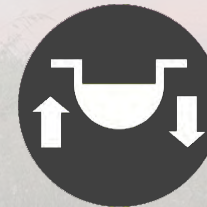
Significant and unreasonable reduction of groundwater storage



Significant and unreasonable land subsidence



Significant and unreasonable seawater intrusion

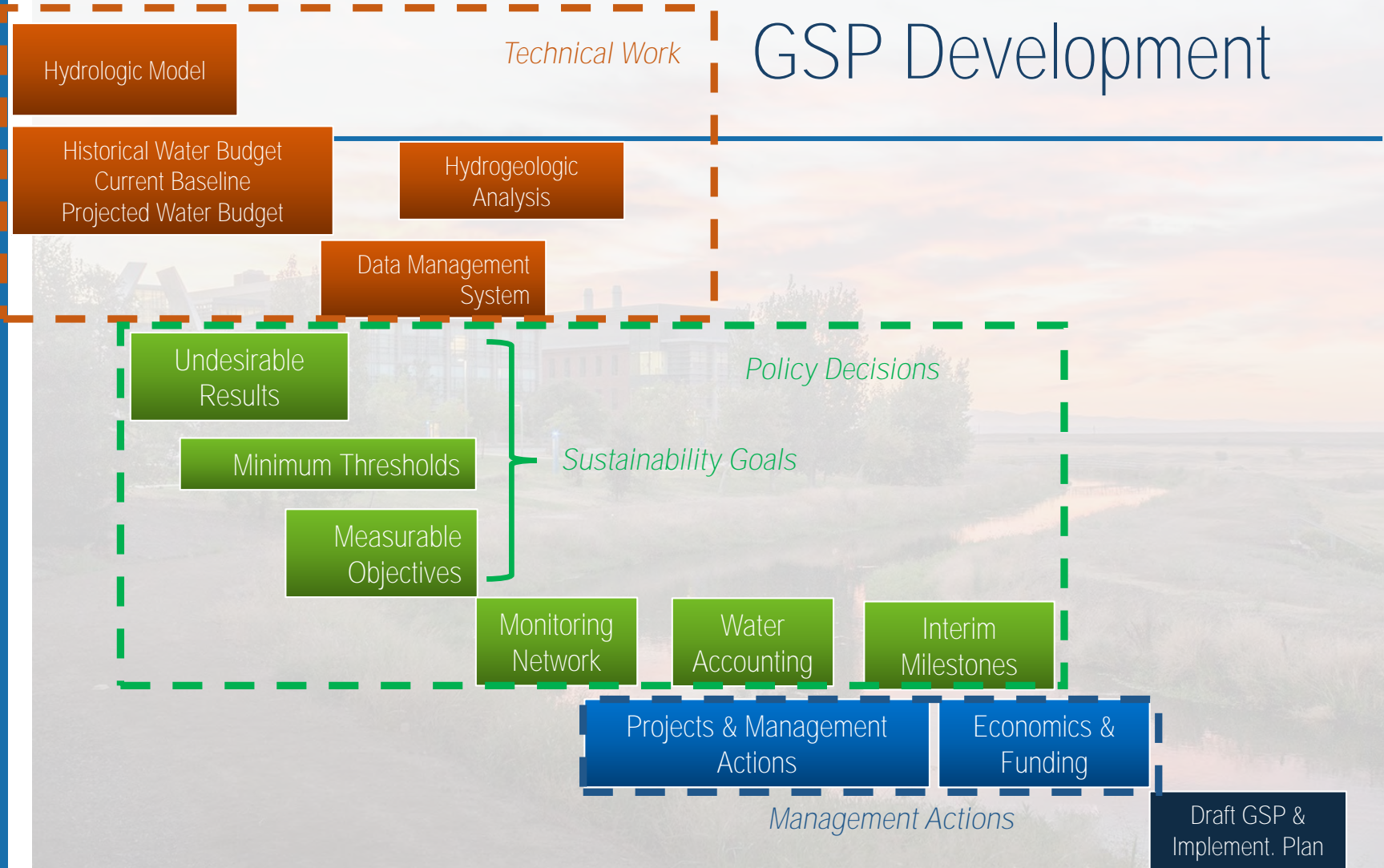


Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water

Image courtesy: Veronica Adrover/UC Merced



# GSP Development



Jun 2018 Jul 2018 Aug 2018 Sep 2018 Oct 2018 Nov 2018 Dec 2018 Jan 2019 Feb 2019 Mar 2019 Apr 2019 May 2019 Jun 2019 Jul 2019

Image courtesy: Veronica Adrover/UC Merced





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# Public Engagement Process

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Image courtesy: Veronica Adrover/UC Merced



# Public Engagement Throughout GSP Development

- Implemented Stakeholder Engagement Plan with Planning Roadmap
- 19 Coordinating Committee meetings (monthly since March 2018)
- 15 Stakeholder Committee Meetings (monthly since May 2018)
- 5 public workshops – Coordinated with SHE/LC, translation services available. Notices in English and Spanish, press releases and notices in Merced Sun-Star
- Bi-monthly coordination calls with Leadership Counsel and Self-Help Enterprises
- [Mercedsgma.org](http://Mercedsgma.org) provided meeting and GSP development information
- Periodic articles provided to Farm Bureau, EMRCD, and Merced Chamber





# Public Workshops included DACs

- ❑ Leadership Counsel and Self-Help Enterprises held community workshops in several DACs that were partially funded through DWR grants
- ❑ GSAs held five public workshops, with translation, throughout the basin:
  - **Merced, August 2, 2018**
    - 27 members of the public attended
    - Topics: SGMA overview and current Merced Subbasin groundwater conditions
  - **Planada, December 4, 2018**
    - 30 members of the public attended
    - Topics: SGMA, Planada Groundwater Conditions, Sustainable Management Options
  - **Franklin, December 13, 2018**
    - 24 members of the public attended
    - Topics: SGMA, Franklin Groundwater Conditions, Sustainable Management Options
  - **Livingston, February 25, 2019**
    - 25 members of the public attended
    - Topics: SGMA, Livingston Groundwater Conditions, GW Allocation Frameworks
  - **Atwater, May 29, 2019**
    - 8 members of the public attended
    - Topics: Sustainable Management Criteria, Sustainable Yield, and Projects and Management Actions



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# Regulations a key driver for GSP Timeline

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- SGMA regulations require a GSP be adopted and submitted to DWR by January 31, 2020 to avoid state intervention
- This regulatory deadline drove GSP development process
- Plan is first effort to characterize groundwater management:
  - Extent of overdraft
  - Potential impacts
  - Data gaps and information needs
  - Groundwater allocation
  - Projects to improve conditions
- Implementation plan will refine information and actions
- Plan adapts through updates every 5 years

Image courtesy: Veronica Adrover/UC Merced



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# Purpose of Today's Joint Board Meeting

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- Discuss comments received on major topics
- Provide opportunity for additional public comments on GSP
- Provide opportunity for joint Board discussion and input to GSA staff who will guide consultant team in revising GSP for adoption
- Receive status update on three Prop 1 funded SDAC projects
- Consider authorization of funds for preparation of Prop 68 grant application

Image courtesy: Veronica Adrover/UC Merced





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# Public Comments Received on GSP

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Image courtesy: Veronica Adrover/UC Merced



# Release of Public Draft GSP

- Published on Website **July 19**
- Hard copies posted in libraries and at GSA main offices
- Notices and press releases in English and Spanish
- 30-day public comment period closed on **August 19**



Image courtesy: Veronica Adrover/UC Merced

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# Public Comment Letters Received

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## NGOs

The Nature Conservancy

Audubon California

Self-Help Enterprises

Leadership Counsel

Joint Environmental Letter from Audubon California, The Nature Conservancy, Clean Water Action/Clean Water Fund, American Rivers, and Union of Concerned Scientists

California Poultry Federation

Valley Land Alliance

## Other

Nickel Family LLC

Private Citizens (2)

Olam Edible Nuts

## Water Agencies

Merquin County Water District

Amsterdam Water District

Sandy Mush Mutual Water Co

East Turlock Subbasin and West Turlock Subbasin GSAs Joint Technical Advisory Committee

San Joaquin River Exchange Contractors GSA

## State and Federal Agencies

US Fish and Wildlife Service, San Luis National Wildlife Refuge Complex

California Department of Fish and Wildlife, Central Region

All written comments are posted on the [MercedSGMA.org](http://MercedSGMA.org) website and were provided to **GSA Board members in advance of today's meeting**



# Approach to Responding to Comments

Response Categories	Response Approach
Minor Corrections/Clarifications	Direct edits to text in GSP
Substantive comments on Draft GSP	Categorized by topic, master responses to be developed, revisions to GSP based on direction from GSAs
Comments on future considerations for GSP Implementation	Categorized and noted for GSA Board consideration and future CC meeting discussion

Image courtesy: Veronica Adrover/UC Merced

# Public Comments Topics To Be Discussed at **Tonight's Meeting**

- Water Level
- Subsidence
- Demand Management
- Allocation Framework
- Water Quality
- Groundwater Dependent Ecosystems
- Stakeholder Outreach

Image courtesy: Veronica Adrover/UC Merced



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# Format for Tonight's Discussion

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For each topic, we will follow the following format:

- Consultants will report on:
  - Relevant sections of GSP
  - Background on GSP approach
  - Who commented
  - Key concerns raised
  - Potential response approach
- Opportunity for public comment
- Board discussion or comment

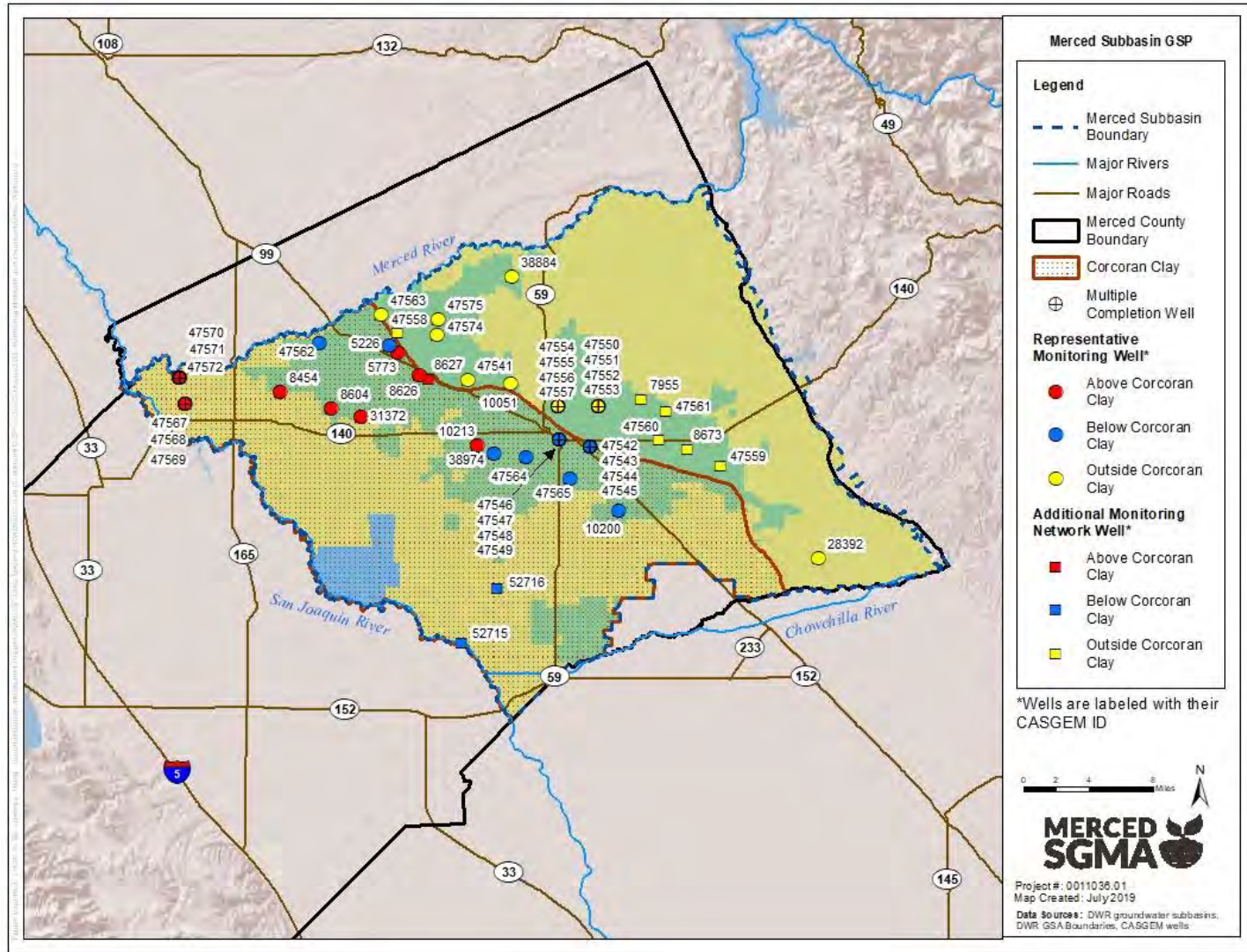
Image courtesy: Veronica Adrover/UC Merced

# Groundwater Levels

Relevant Section of GSP	Sustainable Management Criteria – Water Level
Approach in Draft GSP	<ul style="list-style-type: none"> <li>• Intent was to be protective of all beneficial uses. GSP describes data gaps and plan for ongoing monitoring</li> <li>• Established measurable objectives based on simulated sustainable yield conditions and minimum thresholds at 25 representative wells based on depths of shallowest groundwater wells in vicinity</li> <li>• Undesirable result = 25% of representative wells reaching MT during normal, above normal, and wet years</li> </ul>
Who Commented	Joint Env Orgs, SJR Exchange Contractors GSA, Self-Help Enterprises, Leadership Counsel
Key Concerns Raised	<ul style="list-style-type: none"> <li>• <b>Not adequately protective of disadvantaged communities' drinking water</b></li> <li>• Measurable objective should take into account protection of GDEs</li> <li>• Not enough representative and other monitoring wells</li> <li>• Minimum Thresholds should apply during dry and below normal years</li> <li>• Single well going dry should be considered undesirable result</li> <li>• Consider mitigation program for wells that go dry during GSP implementation</li> </ul>
Potential Response Approach	<ul style="list-style-type: none"> <li>• Reconsider Minimum Threshold approach for year types and provide additional detail on plan for additional representative wells in first 5 years</li> <li>• Request funding for data gap analysis in Prop 68 grant application</li> <li>• Consider mitigation programs for wells that go dry due to lowered GW levels</li> </ul>
Public Comment	
Discussion/Direction	



# Groundwater Monitoring Locations





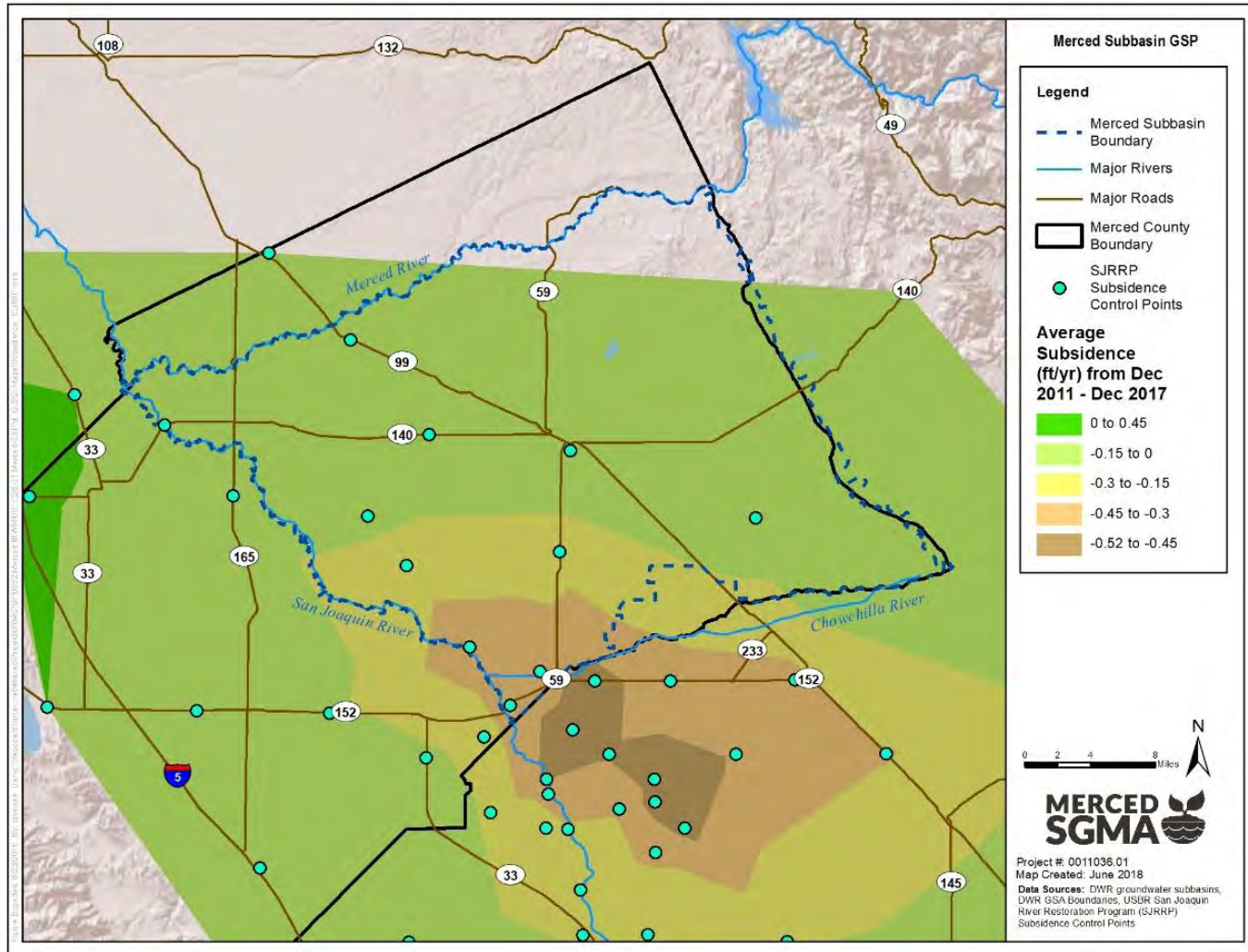
# Subsidence

Relevant Section of GSP	Sustainable Management Criteria – Subsidence
Approach in Draft GSP	<ul style="list-style-type: none"> <li>Established measurable objective of -0.25 ft/yr and minimum threshold -0.75 ft/yr at 4 representative sites based on subsidence rates in 2011-2018</li> <li>Undesirable result = 3+ sites reach MT during above normal, above normal, and wet years</li> </ul>
Who Commented	Valley Land Alliance, SJR Exchange Contractors GSA, Self-Help Enterprises, Leadership Counsel, Nickel Family LLC
Key Concerns Raised	<ul style="list-style-type: none"> <li>Not adequately protective</li> <li>Should immediately reduce sub-Corcoran pumping</li> <li>Only acceptable threshold for subsidence is zero</li> <li>Acknowledge there have been URs related to subsidence already (El Nido)</li> </ul>
Potential Response Approach	<ul style="list-style-type: none"> <li>Clarify/Add information on subsidence in El Nido area</li> <li>Continue coordination with neighboring basins on this issue</li> </ul>
Public Comment	
Discussion/Direction	

Image courtesy: Veronica Adrover/UC Merced



# Subsidence map



# Demand Management

Relevant Section of GSP	Projects and Management Actions
Approach in Draft GSP	GSP describes overdraft situation and need for reduction in basin wide pumping. Includes a management action for Merced Subbasin GSA that described their plans for pumping reduction in their GSA area.
Who Commented	Amsterdam Water District, Cal Poultry Federation, Sandy Mush Mutual Water Co, Self-Help Enterprises, Leadership Counsel, Billy Grissom, Olam Edible Nuts
Key Concerns Raised	<ul style="list-style-type: none"> <li>• Comments on timing of implementation (both to use full 20 year implementation and to accelerate implementation to 10 yrs)</li> <li>• Actively encourage public participation in demand management decisions</li> <li>• Consider excluding some users from demand reductions and/or extraction fees (e.g. drinking water systems, DAC and SDAC small community systems, <i>de minimus</i> users)</li> <li>• Consider how demand management program will be implemented during long term droughts</li> </ul>
Potential Response Approach	<ul style="list-style-type: none"> <li>• This is a work in progress with GSAs</li> <li>• Add more specifics to GSP if they are available prior to adoption</li> <li>• <b>Continue discussion and refinement of each GSA's program with public input and transparency</b></li> </ul>
Public Comment	
Discussion/Direction	



# Allocation Framework

Relevant Section of GSP	Projects and Management Actions
Approach in Draft GSP	Public draft states that GSAs intend to allocate water to each GSA but have not yet reached agreement on allocations or how they will be implemented. Draft includes estimates of basin-wide sustainable yield and developed supply for illustrative purposes.
Who Commented	CDFW, Cal Poultry Federation, Audubon California, Self-Help Enterprises, Leadership Counsel, Billy Grissom, Olam Edible Nuts, Valley Land Alliance
Key Concerns Raised	<ul style="list-style-type: none"> <li>• Comments on need to consider allocation to non-irrigated lands, fairness of allocation, economics, adaptive management of allocation to respond to undesirable results and drought, and incentives</li> <li>• Include managed habitats in framework</li> <li>• Timeline, details have been deferred – want more info in GSP and opportunity for review and comment</li> </ul>
Potential Response Approach	<ul style="list-style-type: none"> <li>• This is a work in progress with GSAs</li> <li>• Add more specifics to GSP if they are available prior to adoption</li> <li>• Continue development of basinwide allocation framework through transparent process that includes public outreach</li> </ul>
Public Comment	
Discussion/Direction	

# Water Quality

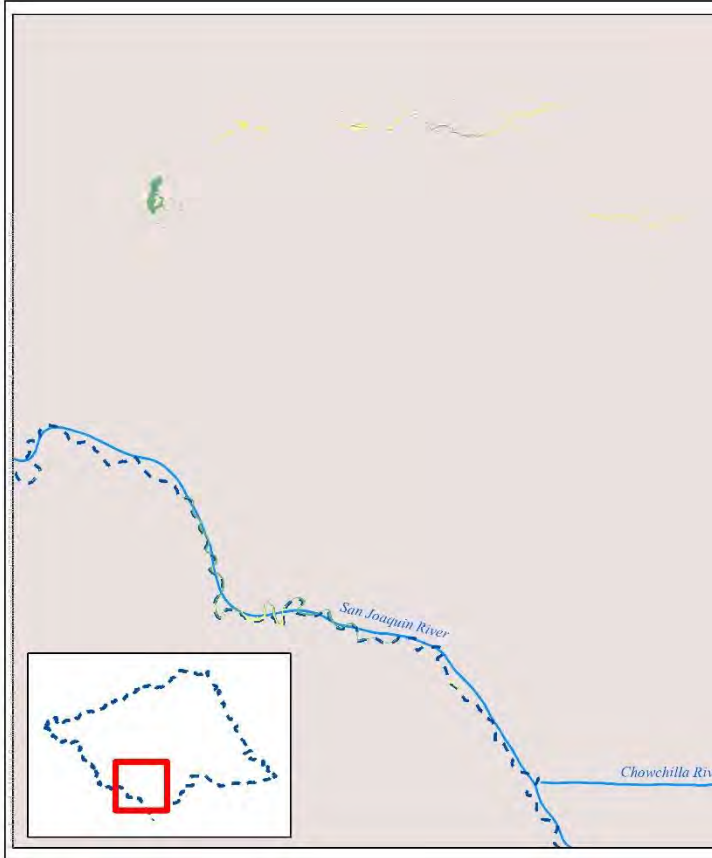
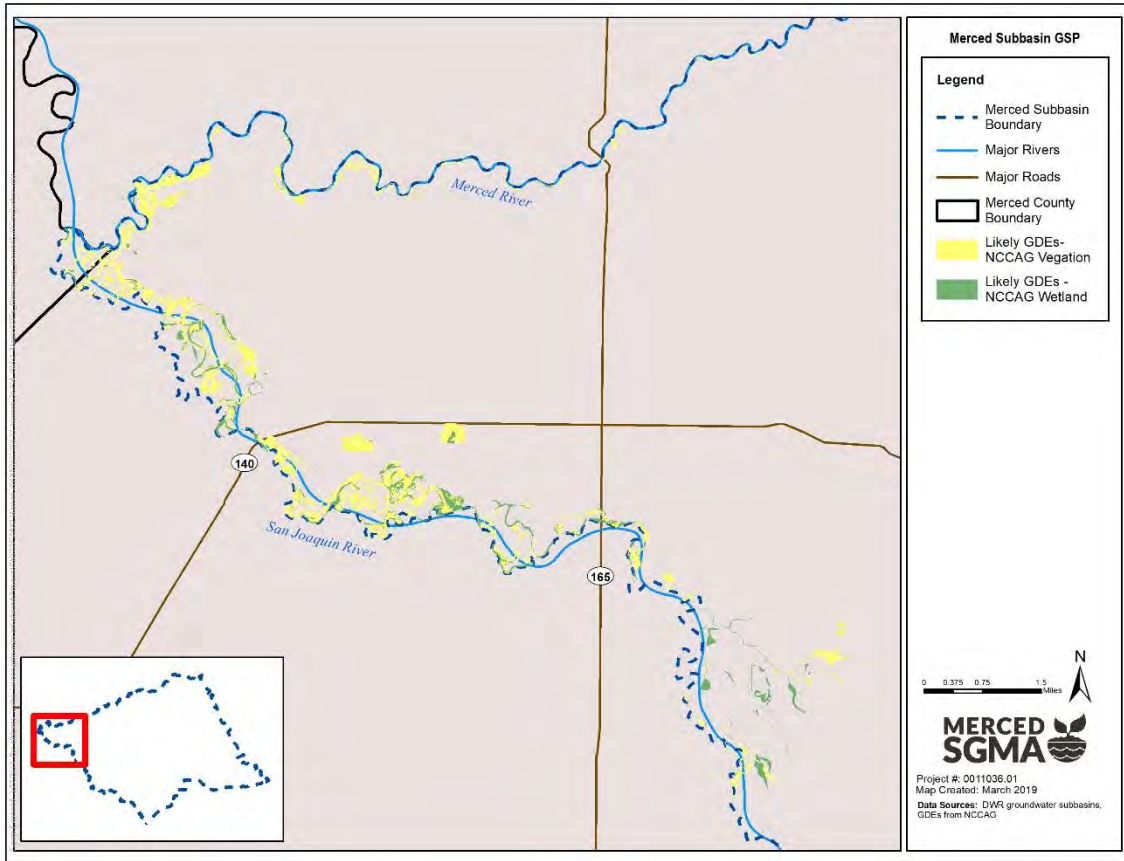
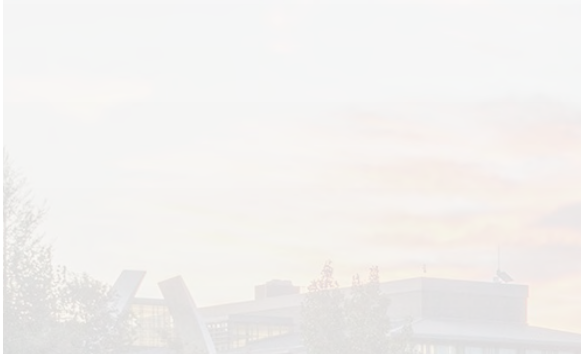
Relevant Section of GSP	Sustainable Management Criteria – Water Quality
Approach in Draft GSP	<ul style="list-style-type: none"> <li>• Set sustainable management criteria for constituents where groundwater extractions affect groundwater quality (causal nexus) and GSAs have authority to control</li> <li>• Established measurable objective of 500 mg/L TDS and minimum threshold of 1,000 mg/L TDS for salinity based on drinking water standards</li> <li>• Undesirable result = 25% of representative wells in basin reaching MT for 2 consecutive years</li> <li>• Monitoring of other constituents, ongoing coordination activities with agencies</li> </ul>
Who Commented	CDFW, Joint Env Letter, Self-Help Enterprises, Leadership Counsel
Key Concerns Raised	<ul style="list-style-type: none"> <li>• <b>Doesn't adequately protect drinking water quality</b></li> <li>• Need to set thresholds for more constituents than just salinity</li> <li>• Not enough monitoring wells</li> </ul>
Potential Response Approach	<ul style="list-style-type: none"> <li>• Clarify and better define what coordination with programs tasked with drinking water protection looks like</li> <li>• Implementation plan – make sure projects evaluate water quality impacts</li> <li>• Incorporate IRWM Water Needs Assessment when available</li> </ul>
Public Comment	
Discussion/Direction	



# Groundwater Dependent Ecosystems

Relevant Sections of GSP	Sustainable Management Criteria, Basin Settings
Approach in Draft GSP	Assessed Natural Communities Commonly Associated with Groundwater (NCCAG) dataset against groundwater depth, supplemental water, irrigated fields, losing streams, and vernal pools to identify potential GDEs in subbasin and described them in the Basin Settings. Considered GDEs as beneficial users of groundwater.
Who Commented	Audubon California, CDFW, Joint Env Letter, The Nature Conservancy
Key Concerns Raised	<ul style="list-style-type: none"> <li>• Further decline groundwater level could adversely effect groundwater dependent ecosystems in the basin</li> <li>• Extensive comments from environmental groups about increasing extent of areas assumed to be GDEs until data collected proves otherwise and making GSP more protective of GDEs</li> </ul>
Potential Response Approach	<ul style="list-style-type: none"> <li>• Connection between groundwater level and GDEs is not well understood</li> <li>• Consider GDE locations in developing plan to fill data gaps for shallow groundwater monitoring</li> <li>• Evaluate incorporation of GDE Pulse Tool into GSP annual report process</li> </ul>
Public Comment	
Discussion/Direction	

# Areas Identified as Potential GDEs





# Stakeholder Outreach

Relevant Sections of GSP	Introduction and Plan Area – Notice and Communication
Approach in Draft GSP	Public engagement to date described in earlier slides, included implementation of stakeholder engagement plan with public meetings, outreach, and communication throughout GSP development. Implementation Plan describes current plans for outreach during GSP implementation including continued meetings of CC and SC.
Who Commented	Joint Env Letter, The Nature Conservancy, Self-Help Enterprises, Leadership Counsel
Key Concerns Raised	<ul style="list-style-type: none"> <li>• Insufficient outreach to environmental groups</li> <li>• Insufficient outreach to disadvantaged communities</li> <li>• Concerns about extent of public outreach</li> <li>• Concerns that Stakeholder committee lacked balanced representation of all stakeholders (in particular, environmental groups and DACs)</li> </ul>
Potential Response Approach	<ul style="list-style-type: none"> <li>• Include SC membership and who they represent in GSP and include Stakeholder Engagement Strategy in appendix</li> <li>• Update Stakeholder Engagement Strategy for implementation phase</li> </ul>
Public Comment	
Discussion/Direction	



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# Next Steps in GSP Adoption Process

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Image courtesy: Veronica Adrover/UC Merced



# Revised Merced GSP Review & Submission Timeline


SEPT	OCTOBER	NOV/DEC	DEC/JAN
Review and Comments on Draft GSP	Consulting team works with GSA staff to make revisions to Draft GSP and prepare comment responses	Recirculate to GSA Boards. Must be adopted by MSGSA, TIWD GSA-1, MIUGSA + its member agencies	Submit to DWR
Joint Board meeting of the three GSA Boards on Sept 18 		Adoption hearings begin no sooner than October 21 (90 days after NOI)	Must be submitted by January 31, 2020

Image courtesy: Veronica Adrover/UC Merced



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# Status of SDAC Grant-funded Projects

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Image courtesy: Veronica Adrover/UC Merced



# Merced Subbasin Awarded Grants

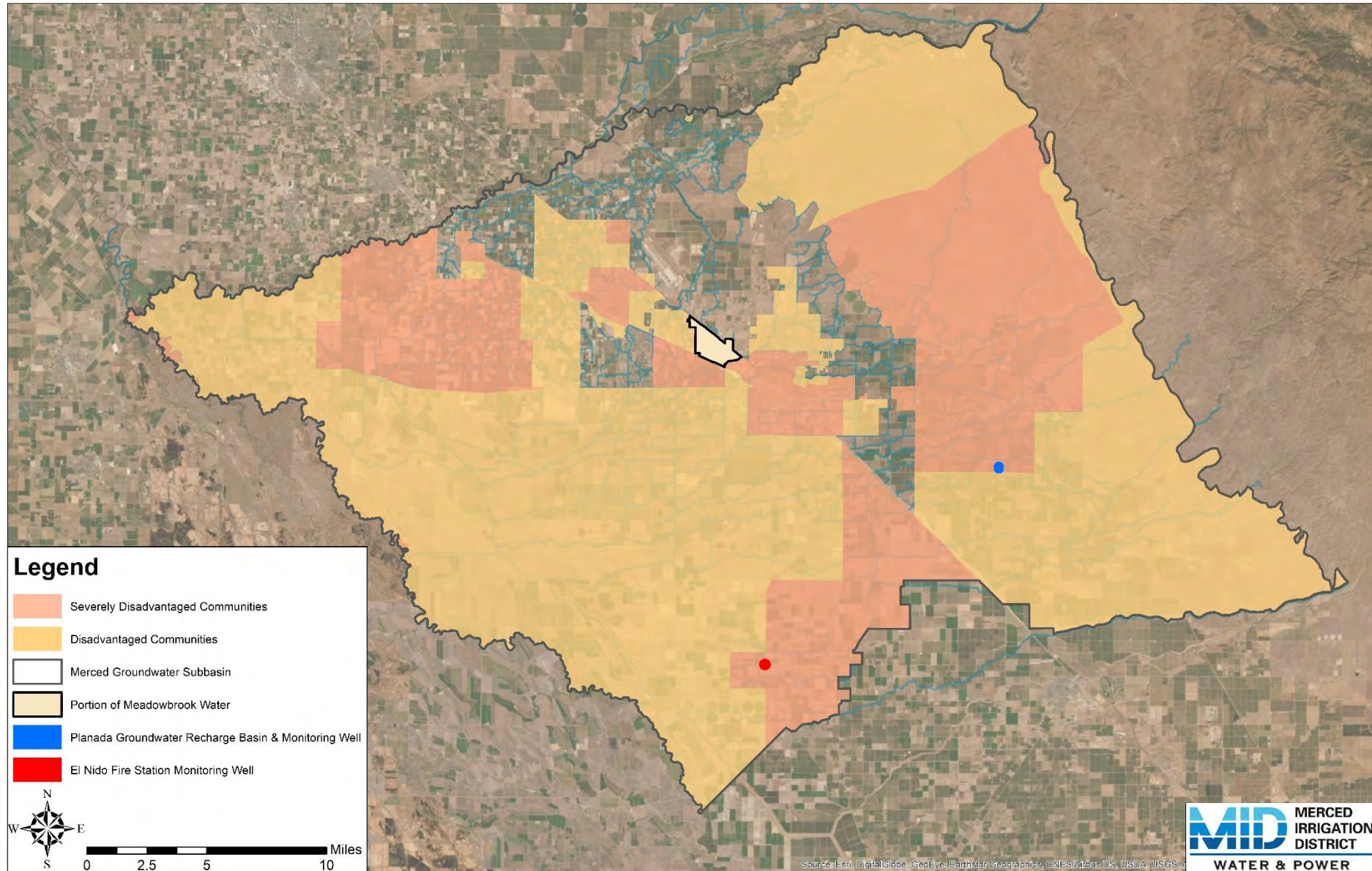
- The 3 GSAs in the Merced Groundwater Subbasin have collectively assigned MID as their representative for purposes of pursuing funding for projects that benefit implementation of SGMA locally.
- Merced Groundwater Subbasin was awarded \$2.4M grant under the 2017 Proposition 1 Sustainable Groundwater Planning (SGWP) Grant.
  - \$1.5M toward development of the GSP
  - \$900K toward projects located within Severely Disadvantaged Communities (SDAC)

# Projects Funded Under 2017 SWGWP Grant (SDAC):

- Planada Groundwater Recharge Pilot Basin & Monitoring Well (\$370k)
- El Nido Groundwater Monitoring Wells (\$400k)
- Meadowbrook Intertie Feasibility Study (\$100k)



# 2017 SGWP Grant – Projects Site Map







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# Prop 68 Funding Opportunity

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Image courtesy: Veronica Adrover/UC Merced





# Proposition 68 Round 3

## Sustainable Groundwater Management (SGM) GRANT PROGRAM



- Round 3 allows applicants previously awarded funding for Prop 1 (Round 2) funds to apply for development of GSPs and projects that help implement GSPs
- Basin eligible for up to \$500,000
- Basin should qualify for 100% local cost share waiver based on DAC percentage of basin
- Application due November 1, 2019
- W&C has prepared scope and budget to prepare grant application – requesting authorization

Image courtesy: Veronica Adrover/UC Merced

# Sustainable Groundwater Management (SGM) GRANT PROGRAM



## DWR tentative schedule for Round 3 funding:

SGM Grant Program Solicitation Schedule	Tentative Schedule*
Final 2019 Guidelines and PSP posted to open solicitation	September 9, 2019
Applicant Workshop	September 18, 2019
Grant Solicitation Closes	November 1, 2019
Public Review of Draft Funding List	January 2020
Final Awards	March 2020

*\* Dates are subject to change and will be determined based on number of comments received for the draft documents, number of applications received, amount of funds requested, and number of grant awards given.*

Image courtesy: Veronica Adrover/UC Merced



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# Coordinating Committee Recommendation

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- CC Recommendation from August 26 meeting for GSA Boards to authorize of up to \$50,000 in funding for Woodard & Curran to prepare Prop 68 Grant Application
- CC designated working group to direct consultants on what to include in grant application

Image courtesy: Veronica Adrover/UC Merced

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# Action Requested

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- Authorize up to \$50,000 in funding for Woodard & Curran to prepare Prop 68 Grant Application, with costs to be shared consistent with GSP Cost Share Allocation in Memorandum of Understanding between the GSAs

Image courtesy: Veronica Adrover/UC Merced





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# Comments from Public

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Image courtesy: Veronica Adrover/UC Merced





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# Adjournment

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Image courtesy: Veronica Adrover/UC Merced



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# Draft GSP Public Comments

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Merced Irrigation-Urban GSA  
Merced Subbain GSA  
Turner-Island Water District GSA-1

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Image courtesy: Veronica Adrover/UC Merced