

Borrego Springs Watermaster
Technical Advisory Committee Meeting
December 18, 2023
AGENDA ITEM VII

To: Technical Advisory Committee (TAC)
From: Andy Malone, PG (West Yost), Technical Consultant
Date: December 13, 2023
Subject: Process and Report Outline for the 5-Year Assessment of the Groundwater Management Plan

Background

The Borrego Springs Watermaster submitted to the California Department of Water Resources (DWR) its Judgment and Groundwater Management Plan (GMP) as an alternative Groundwater Sustainability Plan (GSP) for the Borrego Springs Subbasin (Basin) on June 25, 2021 to comply with the requirements of the Sustainable Groundwater Management Act of 2014 (SGMA). Together, the Judgment and GMP represent the Physical Solution for the Basin to achieve its Sustainability Goal by 2040, which is defined as operating the Basin at its Sustainable Yield without causing Undesirable Results.

Title 23 § 356.4 of the California Code of Regulations requires an assessment of GSPs once every five years (5-year Assessment Report). The Judgment requires compliance with SGMA and calls for the redetermination of the Sustainable Yield once every five years. The redetermination of the Sustainable Yield and the 5-year Assessment Report may necessitate updates to the GMP. Watermaster Staff has begun the process of redetermining the Sustainable Yield by 2025.

During its meeting on October 12, 2023, the Watermaster Board requested that the TAC kickoff the discussion on the appropriate scope of work and schedule for the 5-year Assessment Report of the GMP using the available Proposition 68 grant funding from the DWR.

Outline of the 5-year Assessment Report

The 5-year Assessment Report is meant to evaluate whether the groundwater sustainability program is progressing towards meeting the Sustainability Goal of the Basin and in compliance with the requirements of SGMA and the GSP Regulations. In October 2023, the DWR published “*A Guide to Annual Reports, Periodic Evaluations, & Plan Amendments*.¹ Section 3 of the DWR guidance is attached to this memo as Exhibit 1, which includes the following information on 5-year Assessment Reports:

- A summary of requirements described in SGMA and the GSP Regulations

¹<https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/GSP-Implementation-Guidance-Report.pdf>

- An overview of what a 5-year Assessment Report entails
- An example annotated outline to assist in the development of a 5-year Assessment Report
- Information and context the DWR recommends be included
- Instructions on how to submit the 5-year Assessment Report
- Insight into the DWR's Periodic Review process

The DWR guidance document was used to prepare a draft outline for the 5-year Assessment Report for the Basin, which is attached to this memo as Exhibit 2.

Process and Schedule

The DWR has indicated that the 5-year Assessment Report and Final Updated GMP for the Basin is due by June 2026. This is five years from the date Watermaster submitted the updated GMP to DWR, following approval of the Judgment by the Court in April 2021. However, in accordance with the original submission date (January 2020) and to take advantage of Prop 68 grant funding, the schedule to prepare the 5-year GMP Assessment Report and Final Updated GMP has been set to finish by March 2025. The process of finalizing and submitting the Final Updated GMP to the DWR will likely occur after the expiration of grant funding as part of the regular Board meeting process. The process and schedule described below is to produce the following during WYs 2024 and 2025:

1. **5-year GMP Assessment Report.** Watermaster Staff proposes an iterative process for incrementally preparing sections of the 5-year GMP Assessment Report (Assessment Report). Watermaster Staff will prepare draft section(s) of the Assessment Report and then hold a TAC meeting to facilitate TAC discussion and receive TAC feedback. The TAC will then have up to a three-week period to submit written comments and suggested revisions on the draft section(s). Ultimately, all sections will be compiled into a Draft-Final Assessment Report, which undergo final review by the TAC to develop a TAC Recommendation to the Board on recommended updates to the GMP. The TAC Recommendation to the Board will include all TAC comments and differences of opinion. Finally, the Board will be presented with TAC Recommendation and the Final Assessment Report for review and approval. In this schedule and process, it is assumed that updates to the GMP will be recommended. However, the TAC and Watermaster Board will have final decision on what/if any recommendations warrant an update to the GMP.
2. **Draft and Final Updated GMP.** Following Board approval of the TAC-Recommendation on updates to the GMP, Watermaster Staff will begin making updates to the GMP. Watermaster Staff will prepare the Draft Updated GMP and hold a TAC meeting to facilitate TAC discussion and receive additional TAC feedback. The TAC will have a three-week period to submit written comments and suggested revisions on the Draft Updated GMP. Watermaster Staff will incorporate TAC comments and prepare the Final Updated GMP. At a subsequent TAC meeting, the TAC will develop a TAC Recommendation to the Board to adopt the Final Updated GMP. Finally, the Board will be presented with the Final Updated GMP for review and approval.

Throughout this process, the Technical Consultant will communicate TAC progress to the Board as part of the Technical Consultant Reports and will request Board input/feedback. Stakeholders will also be engaged throughout this process. Two Stakeholder Open Houses will be held (Spring 2024 and Fall 2024) to solicit Stakeholder input.

The milestones for TAC engagement are as follows:

WY 2024

- April 2024 – TAC meeting to discuss sections:
 - Section 1. Background & Objectives
 - Section 2. Status of Projects and Management Actions
 - Section 3. Administrative, Legal, and Coordination Activities
 - Section 4. New Information
- June 2024 - TAC meeting to discuss sections:
 - Section 5 – Current Groundwater Conditions vs. Sustainable Management Criteria
 - Section 8 – Corrective Actions
- August 2024 - TAC meeting to discuss sections:
 - Section 6 – Monitoring Program
 - Section 7 – Basin Setting based on New Information
 - Section 9 – Summary of Completed or Proposed Plan Updates

WY 2025

- October 2024 – TAC meeting to discuss:
 - Draft Final 5-Year Assessment Report
 - TAC-Recommendation to Board on recommended updates to the GMP
- January 2025 – TAC Meeting to review the Draft Updated GMP
- March 2025 – TAC Meeting to finalize TAC-Recommendation to the Board to adopt the Final Updated GMP
- March 31, 2025 – Prop 68 Grant Funding expires

WY 2026

- June 2026 – 5-year GMP Assessment Report and Final Updated GMP due to DWR

Potential DWR Corrective Actions

Note, the Watermaster has not yet received the DWR's comments and/or corrective actions on the Judgment/GMP that was submitted to the DWR as an alternative GSP in June 2021. Once comments and/or corrective actions are received from the DWR, the process and schedule to prepare the 5-year Assessment Report may change accordingly. The Assessment Report outline (Exhibit 2) includes Section 8, which is a placeholder for any corrective actions received from the DWR.

Next Steps

At the TAC meeting, West Yost will provide an overview of (i) the draft outline of the 5-year Assessment Report; (ii) the process and schedule for completing the 5-year Assessment; and (iii) a summary of the TAC comments received on this topic after the November 1, 2023 TAC meeting (Exhibit 3). West Yost will facilitate TAC discussion to obtain additional feedback and recommendations. TAC members are encouraged to submit written comments on the report outline, process, and schedule to Andy Malone (amalone@westyost.com) and Lauren Salberg (lsalberg@westyost.com) by January 8, 2024.

Exhibits

Exhibit 1. DWR's *Groundwater Sustainability Plan Implementation: A Guide to Annual Reports, Periodic Evaluations, & Plan Amendments* [excerpt: Section 3 - Periodic Evaluation Guidance]

Exhibit 2. Draft Annotated Outline of 5-Year Assessment Report for the GMP

Exhibit 3. Responses to TAC Comments/Recommendations on the 5-Year Assessment of the GMP

Exhibit 1

SECTION 3: PERIODIC EVALUATION GUIDANCE

The Periodic Evaluation is a GSA's written assessment of its GSP implementation. The assessment is meant to evaluate whether their groundwater sustainability program is meeting the basin's sustainability goal and continues to meet the requirements of SGMA and the GSP Regulations. This guidance section provides GSAs with the following information:

- A summary of requirements described in SGMA and the GSP Regulations
- An overview of what a Periodic Evaluation is
- An example annotated outline to assist in the development of a Periodic Evaluation
- Information and context the Department recommends be included
- Instructions on how to submit the Periodic Evaluation
- Insight into the Department's Periodic Review process

3.1 GSA Requirements

A key component of demonstrating the GSA's implementation of their GSP is through the Periodic Evaluation of their Plan. SGMA requires GSAs to provide a written assessment evaluating their basin's GSP at least every five years. The written assessment is submitted to the Department for review. Water Code Section 10728.2 identifies the criteria that GSAs should consider when conducting their GSP evaluation and Section 356.4 of the GSP Regulations further details the components of a Periodic Evaluation, including Section 357.4 for basins with multiple GSPs.

Water Code § 10728.2.

A groundwater sustainability agency shall periodically evaluate its groundwater sustainability plan, assess changing conditions in the basin that may warrant modification of the plan or management objectives, and may adjust components in the plan. An evaluation of the plan shall focus on determining whether the actions under the plan are meeting the plan's management objectives and whether those objectives are meeting the sustainability goal in the basin.

GSP Regulations § 356.4. Periodic Evaluation by Agency.

Each Agency shall evaluate its Plan at least every five years and whenever the Plan is amended, and provide a written assessment to the Department. The assessment shall describe whether the Plan implementation, including implementation of projects and management actions, are meeting the sustainability goal in the basin.

- a) A description of current groundwater conditions for each applicable sustainability indicator relative to measurable objectives, interim milestones and minimum thresholds.
- b) A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions.
- c) Elements of the Plan, including the basin setting, management areas, or the identification of undesirable results and the setting of minimum thresholds and measurable objectives, shall be reconsidered and revisions proposed, if necessary.
- d) An evaluation of the basin setting in light of significant new information or changes in water use, and an explanation of any significant changes. If the Agency's evaluation shows that the basin is experiencing overdraft conditions, the Agency shall include an assessment of measures to mitigate that overdraft.
- e) A description of the monitoring network within the basin, including whether data gaps exist, or any areas within the basin are represented by data that does not satisfy the requirements of Sections 352.4 and 354.34(c). The description shall include the following:
 - 1) An assessment of monitoring network function with an analysis of data collected to date, identification of data gaps, and the actions necessary to improve the monitoring network, consistent with the requirements of Section 354.38.
 - 2) If the Agency identifies data gaps, the Plan shall describe a program for the acquisition of additional data sources, including an estimate of the timing of that acquisition, and for incorporation of newly obtained information into the Plan.
 - 3) The Plan shall prioritize the installation of new data collection facilities and analysis of new data based on the needs of the basin.
- f) A description of significant new information that has been made available since Plan adoption or Amendment, or the last five-year assessment. The description shall also include whether new information warrants changes to any aspect of the Plan, including the evaluation of the basin setting, measurable objectives, minimum thresholds, or the criteria defining undesirable results.
- g) A description of relevant actions taken by the Agency, including a summary of regulations or ordinances related to the Plan.
- h) Information describing any enforcement or legal actions taken by the Agency in furtherance of the sustainability goal for the basin.
- i) A description of completed or proposed Plan Amendments.
- j) Where appropriate, a summary of coordination that occurred between multiple Agencies in a single basin, Agencies in hydrologically connected basins, and land use agencies.
- k) Other information the Agency deems appropriate, along with any information required by the Department to conduct a periodic review as required by Water Code Section 10733.

GSP Regulations § 357.4 Coordination Agreement (For Basins with Multiple GSPs)

- i) Coordination agreements shall be reviewed as part of the five-year assessment, revised as necessary, dated, and signed by all parties.

3.2 Periodic Evaluation Document Overview

A Periodic Evaluation is an opportunity for GSAs with an approved GSP¹⁸ to convey to the Department, interested parties, and the public progress on GSP implementation. The Periodic Evaluation should provide the status of groundwater conditions and progress toward meeting interim milestones and measurable objectives. The Periodic Evaluation should also describe the advancement of projects and management actions over the evaluation cycle including the associated quantified cumulative benefits. The Periodic Evaluation should explain how those cumulative benefits are contributing to the basin achieving its sustainability goal and operating within its sustainable yield. Conversely, the Periodic Evaluation should describe any unforeseen challenges encountered with the development or implementation of certain projects and management actions and the outcome of responding to those challenges. With the requirement that a GSA conduct a Periodic Evaluation at least every five years from the initial GSP submittal, the GSA's written assessment is a reflection on GSP implementation and adaptive management for that particular evaluation cycle. The GSA should utilize the Periodic Evaluation to explain trends seen in data collected for previously submitted Annual Reports.

REMINDER:

The cover letter of the Department's GSP determination includes the date that initiates the first Periodic Review of the Plan by the Department and the effective due date of the first Periodic Evaluation by the GSA (i.e., 5 years from the submittal of the initial GSP – this date can be found on the SGMA Portal). Periodic Evaluations will be due every five years thereafter.

The Periodic Evaluation also acts as the document where a GSA articulates whether a Plan Amendment is needed. The Periodic Evaluation will be part of the GSP record and will be included in a determination from the Department during the Periodic Review. Additionally, if a GSA submits a Plan Amendment at any time, a Periodic Evaluation must accompany that submittal. The Periodic Evaluation should be used to provide a high-level description of the amended sections of the Plan, including an explanation of the rational for the Amendment, which is further described in the suggested Periodic Evaluation annotated outline section below. Amended sections of a Plan should not be copied and pasted into a Periodic Evaluation; however, providing redline strikethrough text highlighting where changes were made in the Amended Plan may be appropriate. If a GSA intends to amend their Plan, it may be beneficial to coordinate the Amendment with a Periodic Evaluation cycle.

REMINDER - Recommended Corrective Actions:

GSA are expected to provide a detailed discussion of how the recommended corrective actions are being addressed or were addressed for each of the Plan elements and sections below, as applicable. When the recommended corrective actions warrant a Plan Amendment the Periodic Evaluation should describe the amended components of the Plan.

¹⁸ Periodic Evaluations are not required for a GSP that the Department has determined to be Inadequate and has referred to the State Water Resources Control Board. The Department does not conduct a Periodic Review of an Inadequate GSP or any revisions or amendments to an Inadequate GSP unless the State Water Resources Control Board formally relinquishes responsibility for the Basin to the Department or requests additional assessment of the Plan under Water Code § 10735.2(b).

The Periodic Evaluation should be the GSAs' honest and detailed interpretation of how implementation is taking place, what successes and challenges have been encountered, and how the challenges have been, or are proposed to be, overcome. The more details and feedback provided to the Department in the Periodic Evaluation, the better the Department can assist GSAs with their implementation efforts. Ultimately, the goal of the Periodic Evaluation is for GSAs to assess how Plan implementation is progressing and to provide an explanation and proposed management adjustments if implementation is not achieving the goals and milestones as originally anticipated.

The suggested Periodic Evaluation annotated outline has been developed to provide GSAs with an example of a written assessment approach. The annotated outline is based on the GSP Regulations requirements and provides a consistent format for developing written assessments for the GSAs. The annotated outline is intended to be a guide, and use of the outline does not guarantee a continued approval determination from the Department. As GSAs prepare their Periodic Evaluations, it is important to clearly articulate changes made to the Plan, the justification and explanation for decisions, and the evidence that supports implementation is achieving the sustainability goal for the basin. GSAs are encouraged to review Attachment 1 of this document for Department answers to frequently asked questions regarding Periodic Evaluations.

The following questions can help with the organization and development of the written assessment. In particular, GSAs should provide the following information for each key GSP section discussed below:

- What new information has been collected?
- What is the status of the components of this section? Describe any changes.
- Was there a recommended corrective action associated with this section? Explain how it was addressed.
- How have actions taken in this section informed changes in basin management?
- Is there a need to change a section of the GSP that would lead to a Plan Amendment? Which section has or will be revised in the Plan Amendment?

3.3 Suggested Periodic Evaluation Annotated Outline

EXECUTIVE SUMMARY

The executive summary of the Periodic Evaluation's written assessment is intended to provide a high-level overview of GSP implementation activities, address whether implementation is on track for reaching the basin's sustainability goal and provide an overview of significant new information received and included in the assessment.

Content to consider for inclusion in the executive summary:

- *Period of time the Periodic Evaluation covers (evaluation cycle).*
- *Is the Periodic Evaluation accompanied by an amended Plan? If yes, identify the month and year the Plan was amended (e.g., January 2025) and describe the Plan re-adoptions process, if applicable.*
- *Updated GSA information:*
 - *Modifications to GSAs and their member agencies.*
 - *Changes to governance structure.*

- If there were recommended corrective actions provided by the Department in the most recent determination of the Plan, summarize what they were, whether they were addressed and whether they led to a Plan Amendment.
- Describe the basin's sustainability goal and whether the implementation of the GSP is on track to meet the basin's sustainability goal.
- Include a general statement on how GSA activities are progressing within the basin, which should be supported by the content presented in the written assessment.
- Summarize any significant new information and data that were acquired during the evaluation cycle and present how that information or those data were used in preparing the Periodic Evaluation.
- Describe the efforts taken to engage with interested parties. Provide a high-level summary of public comments received during GSP implementation or while preparing the Periodic Evaluation

NEW INFORMATION COLLECTED¹⁹

The Periodic Evaluation should provide a description of any new information, including significant new data, that the GSA has acquired during the evaluation cycle. The discussion should include whether new information warrants changes to any aspect of the Plan, including the evaluation of the basin setting, measurable objectives, minimum thresholds, or the criteria defining undesirable results. Additionally, this section should evaluate whether those changes associated with the new information led to a Plan Amendment.

Table 7 below provides an example of a method of summarizing the types of significant new information collected and how to reference that information in the applicable sections. Table 7 is meant to summarize information that has become available since the last Periodic Evaluation (or Plan Adoption or Plan Amendment) which has informed the GSA's decisions and approaches to implement its GSP. Table 7 should indicate whether the new information warrants changes to any aspect of the Plan.

Significant New Information (e.g., new monitoring data, reports, coordination with other agencies, data provided by the Department)	Description	Aspects of Plan Affected (e.g., Basin Setting, Sustainable Management Criteria, Projects and Management Actions, Monitoring Network, Coordination Agreement)	Warrant Change to Any Aspects of the Plan (Yes/No) If yes, include section of the Plan

Note: GSAs will need to fill in the blanks for information they consider significant new information.

Table 7. Summary of New Information Since Periodic Evaluation

GROUNDWATER CONDITIONS RELATIVE TO SUSTAINABLE MANAGEMENT CRITERIA²⁰

This section sets the stage for evaluating the GSAs' progress towards achieving groundwater sustainability in their basin. The GSA should evaluate current groundwater conditions for each applicable sustainability indicator relative to sustainable management criteria established in the GSP (i.e., measurable objectives, interim milestones, minimum thresholds, and undesirable results) and

19 23 CCR § 356.4. (f)

20 23 CCR § 356.4. (a)

describe, with supporting data, whether implementation of the GSP is effective. If the evaluation indicates that GSP implementation has not been effective in making progress toward achieving the sustainability goal, this section should include an explanation of the potential reasons and provide a description of how the GSA intends to get the basin back on track to achieving sustainability. The written assessment should also forecast the likelihood of achieving interim milestones or measurable objectives within the next evaluation cycle. This section may include discussion of hydrologic or climatic extremes and how the associated conditions and/or emergencies have impacted GSP implementation, as well as the adaptive management strategies used to keep the basin on track, or to get the basin back on track, to achieving sustainability.

If the Department provided recommended corrective actions related to sustainable management criteria, the GSA should include a discussion of how those were addressed. If the recommended corrective actions were addressed with a Plan Amendment, the GSA should provide that explanation and indicate where the changes can be found in the amended GSP.

For **each applicable sustainability indicator**, consider the following discussion points:

- Did the previous determination of the Plan by the Department include a recommended corrective action related to this sustainability indicator? How was it resolved?
- Describe current conditions relative to the minimum thresholds, interim milestones, and measurable objectives.
- Are the current conditions in the basin achieving the interim milestones?
- Describe if undesirable results are occurring or have occurred over the evaluation cycle. Were there minimum threshold exceedances that did not constitute undesirable results as quantitatively defined in the GSP?
- Evaluate progress made (including challenges encountered, if applicable), describe any adaptive management approaches employed to address minimum threshold exceedances, whether GSP implementation is effective thus far, and any other pertinent information related to progress towards achieving sustainability.
- Have basin conditions and GSP implementation affected beneficial uses and users? For example, were there any reported dry wells during the evaluation cycle?
- Are other sustainability indicators being impacted?
- If significant new information is leading to a change in sustainable management criteria, describe these changes and compare the previous sustainable management criteria to the adjusted management criteria.
- If changes are made, did they warrant a Plan Amendment?

STATUS OF PROJECTS AND MANAGEMENT ACTIONS²¹

The purpose of this section is to summarize the GSA implementation activities related to projects and management actions that took place over the course of the evaluation cycle. The summary should include descriptions of ongoing projects that have carried over during the evaluation cycle and projects that broke ground but have not become operational. In addition, significant new information should be discussed, such as whether a GSP project was considered no longer necessary and was dropped, a new project was added, or a project has been delayed. New information that affects project development, such as hydrologic changes relative to a drought or wet year should

²¹ 23 CCR § 356.4. (b) & (f).

be described. The description should include anticipated projects to be developed over the next evaluation cycle(s). The discussion of the projects should include evaluations and reporting on the quantified benefits of each project and anticipated benefits of the projects that broke ground or were completed during the evaluation cycle.

A GSA should summarize how it is tracking and administering the various projects and management actions within its basin. The summary should describe interactions with the project proponents and member agencies implementing the projects. Table 8 shows an example of this summary.

Project or Management Action Name	Project or Management Action Description	Targeted Sustainability Indicator	Project Status	Expected Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Accrued Benefits at Completion

Table 8. Example Project and Management Action Summary Table

A GSA should assess the projects and management actions outlined in the original GSP and explain whether those are still relevant and feasible, including estimates of cost and potential funding sources and whether permitting and CEQA requirements need to be met. The Periodic Evaluation should describe if there is a need to revisit or re-evaluate the priority of certain projects. Additionally, for the various projects and management actions outlined in the GSP, the GSA should describe the process for public notice and engagement of interested parties.

For projects and management actions that are currently ongoing or have already been completed, the Periodic Evaluation should provide an evaluation and status update including realized benefits, expected benefits, and benefits and impacts to beneficial uses and users. The description should include how these projects and management actions are helping the basin achieve sustainability through the assessment of the groundwater conditions in relation to the measurable objectives for the relevant sustainability indicators. A description of the monitoring network and data related to projects and management actions that are showing progress toward sustainability, and documentation that the project is not impacting nearby beneficial users, should be included.

For projects and management actions that have yet to begin or are still conceptual, assess the need for those based on the current conditions and expected outcomes of the existing projects and management actions. Describe the potential timeline to get those projects and management actions implemented or what may be needed to take them from the conceptual or as-needed phase to the "shovel ready" phase.

The GSA should describe the challenges or setbacks that have prevented or delayed implementation of projects and management actions. If a planned project is not going to be implemented, the GSA should consider re-evaluating projected water budgets and groundwater conditions without the project.

BASIN SETTING BASED ON NEW INFORMATION OR CHANGES IN WATER USE²²

This section provides an evaluation of the basin setting based on new information or changes in basin water use. GSAs should explain the major cause of any significant new changes in the understanding of the basin setting, such as changes attributed to water use and supply, climate variations, successes and failures of projects and management actions, or significant new information and data that causes changes in model assumptions and results. A suggested outline to discuss the basin setting is provided below:

- **Hydrogeologic Conceptual Model**
 - Summarize any new applicable data and analysis and how it informs a revised understanding of the basin's hydrogeologic conceptual model (e.g., Airborne Electromagnetic surveys and other basin characterization and data gap filling actions)
 - If the previously identified data gaps were not filled, discuss why or what prevented these from being filled and discuss what is required to fill these data gaps
- **Groundwater Conditions**
 - Indicate new understanding of regional groundwater conditions based on new sources, applications, or tools such as California Groundwater Live, InSAR, Dry Well Reporting System, etc.
 - Include new information that affects evaluation of groundwater quality such as:
 - Changes to regulatory water quality standards affecting sustainable management criteria
 - New constituents of concern or emerging contaminants that may become apparent in the basin
 - Include new information on interconnected surface water and groundwater dependent ecosystems.
- **Water Use Changes and Associated Water Budget**
 - Describe water use for the evaluation cycle, compared to historical, current, and projected water budgets in GSP.
 - Describe changes to land use or cropping patterns that could affect water use.
 - Describe whether changes to surface water supply reliability will affect water budget assumptions.
 - Provide updated current and projected water budgets.
 - Describe updates to the sustainable yield and changes in storage.
 - If basin is experiencing overdraft, describe the evaluation and quantification of those conditions. Provide an assessment of measures to mitigate the overdraft including how the projects and management actions described in the Periodic Evaluation may affect overdraft.
- **Model Updates**
 - Briefly describe if and how the model was updated for the water budget development.
 - How has GSP implementation informed model revisions, if any?
 - Note that model updates may indicate where more monitoring is needed, and the quality of the existing monitoring informs the model revisions.

²² 23 CCR § 356.4(d).

MONITORING NETWORKS²³

The purpose of this section is to provide an assessment of the GSP's monitoring network for each applicable sustainability indicator. GSAs submitting an amended GSP with their Periodic Evaluation should include any discussions related to the assessment and improvement of the GSP's monitoring network in the amended GSP. GSAs should reference the sections of the amended GSP in the Periodic Evaluation rather than replicating the same information in the Periodic Evaluation.

As a reminder, the requirements of the GSP Regulations (23 CCR § 354.38) are provided below:

GSP Regulations § 354.38. Assessment and Improvement of Monitoring Network

- a)** Each Agency shall review the monitoring network and include an evaluation in the Plan and each five-year assessment, including a determination of uncertainty and whether there are data gaps that could affect the ability of the Plan to achieve the sustainability goal for the basin.
- b)** Each Agency shall identify data gaps wherever the basin does not contain a sufficient number of monitoring sites, does not monitor sites at a sufficient frequency, or utilizes monitoring sites that are unreliable, including those that do not satisfy minimum standards of the monitoring network adopted by the Agency.
- c)** If the monitoring network contains data gaps, the Plan shall include a description of the following:
 - 1.** The location and reason for data gaps in the monitoring network.
 - 2.** Local issues and circumstances that limit or prevent monitoring.
- d)** Each Agency shall describe steps that will be taken to fill data gaps before the next five-year assessment, including the location and purpose of newly added or installed monitoring sites.
- e)** Each Agency shall adjust the monitoring frequency and density of monitoring sites to provide an adequate level of detail about site-specific surface water and groundwater conditions and to assess the effectiveness of management actions under circumstances that include the following:
 - 1.** Minimum threshold exceedances
 - 2.** Highly variable spatial or temporal conditions
 - 3.** Adverse impacts to beneficial uses and users of groundwater
 - 4.** The potential to adversely affect the ability of an adjacent basin to implement its Plan or impede achievement of sustainability goals in an adjacent basin

²³ 23 CCR § 356.4(e).

This section should include the GSA's findings from the evaluation of the GSP's monitoring networks for each sustainability indicator. It is suggested that this section includes the following topics, information, and data:

- Provide an overall summary of changes to monitoring networks since the last GSP or Periodic Evaluation.
- Describe whether identified monitoring network data gaps have been filled. If the previously identified data gaps were not filled, explain why or what prevented these from being filled and discuss what is required to fill these data gaps.
- Discuss any new data gaps that have been identified since the previous GSP.
- Assess the functionality of the water level monitoring network and whether any existing GSP monitoring network locations are no longer viable. The following information should be included and referred to in this section of the evaluation:
 - Identify each monitoring location on a map including the wells used to monitor each specific principal aquifer.
 - If a well is damaged or dry, determine whether the site is necessary to evaluate basin conditions, and if so, propose a plan to replace it.
 - Review sustainable management criteria relative to well construction, and if the monitoring point is not capable of measuring the sustainable management criteria (i.e., is not deep enough), propose an alternative monitoring approach or well replacement plan.
- For other sustainability indicators, perform a similar monitoring network functionality assessment in light or appropriateness of location of sites, accessibility and viability of sites, and any corrections needed.
- Describe remaining actions necessary to improve the monitoring networks.
- Summarize any adjustments made to monitoring frequency and density of monitoring sites.
- Summarize any changes to the GSP's monitoring network as highlighted in the Periodic Evaluation or Plan Amendment.
- Verify that any updates to the GSP's monitoring network are reflected in the Monitoring Network Module²⁴

GSA AUTHORITIES AND ENFORCEMENT ACTIONS²⁵

The Periodic Evaluation should describe any new authorities the basin's GSAs have gained, established, or exercised since the last GSP submittal and summarize what has been implemented to advance groundwater sustainability. Authorities could pertain to relevant actions related to regulations and ordinances applicable to the Plan. In addition, GSAs should provide information describing any enforcement or legal actions taken in the basin to further the sustainability goal. This could include any new significant information such as funding and fee actions, installing volumetric measuring devices on wells (i.e., flow meters), or collecting other data related to allocation programs and pumping reductions. Demonstrating how these components of GSP implementation will help GSAs reach sustainability is important.

²⁴ During the evaluation cycle and while preparing a Periodic Evaluation, GSAs should visit the Department's SGMA Portal resources page to understand any changes and improvements to the Portal, including the Monitoring Network Module. <https://sgma.water.ca.gov/portal/resources>

²⁵ 23 CCR § 356.4. (g) and (h)

Some considerations for this section are listed below:

- Provide a summary of GSA regulations or ordinances related to the Plan [Water Code 10725, 10726, 10730, and 10731].
- Describe GSA enforcement or legal actions [Water Code 10725.4, 10730, and 10732].
- Describe activities advancing other regulations and orders outside of SGMA that are related to SGMA implementation, if applicable (e.g., legislation such as Senate Bill 552²⁶ [Drought Planning for Small Water Suppliers and Rural Communities], well moratoriums, and land use zoning).
- Describe how Plan implementation has been affected by external regulatory requirements or executive orders issued by the Governor, if applicable.

OUTREACH, ENGAGEMENT, AND COORDINATION WITH OTHER AGENCIES²⁷

During GSP implementation it is important to continue to build on the outreach, engagement, and communication efforts established during initial Plan development across multiple entities. GSAs should notice and engage the public on the draft Periodic Evaluation in a manner similar to initial Plan adoption. This section should describe, as appropriate, the coordination efforts and activities that occurred between multiple GSAs in a single basin, GSAs in hydrologically connected basins, and land use agencies, as well as federal, state, and local agency coordination that was related to SGMA implementation. Specifically, GSAs should consider the various audiences they need to communicate and interact with during GSP implementation activities.

Outreach and Engagement

GSAs are responsible for engaging interested parties, the public, and beneficial users to provide updates on basin conditions during annual reporting, regularly share groundwater management information, solicit feedback on projects and management actions prior to and during implementation, and collect public comments during Periodic Evaluation and Plan Amendment drafting. GSAs should demonstrate these responsibilities in the following ways:

- Provide an assessment of public comments submitted to the GSA after the initial Plan submittal or during evaluation cycle. The assessment should include a discussion of how the GSA responded to the comments and implemented relevant changes (i.e., incorporating components into the Periodic Evaluation or Plan Amendment).
- Describe public engagement efforts including activities that help the implementation of project and management actions, such as project siting and construction, water conservation, and participation in recharge, recycled water use, land repurposing, or domestic well monitoring and reporting programs. Identify and describe how the GSA will address potential impacts on beneficial users documented through these public engagement efforts.
- Evaluate and verify that the methods described in the Plan for outreach and engagement activities are relevant to implementation and are being maintained and updated.

Responsibilities of GSA Boards

Keeping GSA board members engaged and ensuring they understand GSA responsibilities for Periodic Evaluation development and decisions on Plan Amendment needs is crucial to ensure a

²⁶ <https://water.ca.gov/Programs/Water-Use-And-Efficiency/SB-552>

²⁷ 23 CCR § 356.4. (j)

successful implementation program. The Periodic Evaluation should provide a summary of GSA board, technical advisory committee, and other related meetings since the last Periodic Evaluation, including notifications to the list of interested persons [23 CCR § 351(p); Water Code § 10723.4, 10723.2, 10723.8, and 10727.8].

Coordination with Other Agencies

Multiple layers of inter-agency coordination are needed periodically during GSP implementation, such as:

- Coordinating with other agencies in the same basin or county during implementation efforts that have land use, well permitting and water management responsibilities (e.g., neighboring GSAs in same basin).
- Coordinating with GSAs in hydrologically connected basins to understand implementation activities and potential effects across basin boundaries, and to share data.
- Reaching out to tribal, federal, state, and other local agencies, as needed, to facilitate implementation activities.
- Indicate if any new inter-agency agreements and efforts are under way.
- Provide a summary of inter-agency coordination efforts, coordination with local well permitting and land use planning agencies, state and federal agencies, and non-governmental organizations (e.g., coordination efforts related to impacts to drinking water wells, mitigating subsidence before infrastructure damage, or water quality impairment). Document if any changes were made to the GSP in response to new local requirements by these agencies.
- Discuss any changes to the GSA Coordination Agreement (for basins with multiple GSPs)
 - o Review the initial Coordination Agreement to ensure the agreement is still applicable or if the agreement needs to be updated or revisited.
 - o If changes are made, summarize those changes.

OTHER INFORMATION²⁸

GSAs may decide to include any additional information in the Periodic Evaluation that helps describe progress made toward achieving the sustainability goal for the basin. The Department also has the authority to request supplemental information from a GSA to conduct the Periodic Review, as necessary. A list of potential additional information is provided below.

Consideration of Adjacent Basins

The GSP Regulations require the Department to review the potential impacts a Plan may have on adjacent basins (23 CCR § 355.4(b)(7)). Other sections in the GSP Regulations request this information from the GSAs (23 § CCR 354.38). Therefore, it is important to provide that information in the Periodic Evaluation to give the Department a complete overview, such as:

- Describe relevant interbasin coordination efforts.
- Discuss how the proposed management of the Basin (including minimum thresholds and measurable objectives) aligns with the management of adjacent basins.
- Describe potential impacts from adjacent basins and/or to adjacent basins due to Plan implementation.
- Assess whether Plan implementation is affecting the ability of an adjacent basin to achieve its sustainability goal.

²⁸ 23 CCR § 356.4(k).

Challenges Not Previously Discussed

The Periodic Evaluation process provides the GSAs with an important opportunity to highlight technical and financial challenges the Department should be aware of. Allowing the Department to understand these challenges may inform future assistance and services. Below are a few example items that could be added to the Periodic Evaluation:

- Identify the most significant challenges and assistance needs for the GSA and Plan implementation.
- Assess how the Plan or amended Plan may affect relevant city and county general plans related to water resources management or other natural resources and land use planning programs.²⁹
- Other general considerations include technical and financial resource limitations, Proposition 218 and other funding stream efforts, shifts in Joint Powers Authority agreements or other aspects of basin governance.

Legal Challenges

GSAs should consider providing a discussion on legal matters, especially if GSP implementation is affected or may be affected by any legal challenge or adjudication.

SUMMARY OF PROPOSED OR COMPLETED REVISIONS TO PLAN ELEMENTS³⁰

This section summarizes the key take-aways from the Periodic Evaluation. In addition, this section should end with a brief overview of next steps and how the GSAs intend to use this evaluation to continue moving the basin towards their sustainability goal.

Proposed Revisions to Plan Elements³¹

If the GSA decides a Plan Amendment is necessary, the GSA should describe proposed revisions to relevant Plan elements. This section should also provide the rationale for developing a Plan Amendment and the necessary actions the GSA will take to complete the amendment, including outreach and engagement to interested parties.

REMINDER:

For Periodic Evaluations that accompany a Plan Amendment, GSAs must ensure the Periodic Evaluation is not:

- A copy/paste of the GSP sections that were revised or amended.
- A simple: "See Section X."

The Periodic Evaluation must provide specific explanations of what was amended, why, and the effects of those amendments on the implementation of the Plan (e.g., adapting the management program, adjusting projects and management actions).

²⁹ Water Code § 10727.2(g); Water Code § 10727.4(k)(l).

³⁰ 23 CCR § 356.4. (c) and (i)

³¹ 23 CCR § 356.4. (i)

3.4 Periodic Evaluation Submittal Requirements

The Periodic Evaluation of approved GSPs shall be submitted to the Department by an authorized Plan representative via the SGMA Portal online submittal platform at a minimum every five years following the initial GSP submittal and whenever the Plan is amended. The following steps should be taken to upload the Periodic Evaluation to the SGMA Portal:

1. Upload a PDF of the Periodic Evaluation with filename using the Basin Number_Periodic_Evaluation_Year format (Ex. #-###_Periodic_Evaluation_WY_20XX)
2. Upload the Periodic Evaluation Elements Guide

3.5 Periodic Review by the Department

The Department's Periodic Review will occur at least every five years with the first Periodic Review being initiated five years after submittal of the initial GSP. The Periodic Review involves evaluating the Plan, Annual Reports, and Periodic Evaluations. The Periodic Review will result in the Department providing an assessment of the basin's GSP implementation progress and issuing a determination of approved, incomplete, or inadequate. Note that the approval of a previously submitted GSP does not guarantee continued approval by the Department during the implementation period.

REMINDER:

The Department will use Annual Reports and Periodic Evaluations submitted by the GSAs for their Periodic Review and assessment of progress made toward achieving sustainability in each basin.

Water Code § 10733.

- a) The department shall periodically review the groundwater sustainability plans developed by groundwater sustainability agencies pursuant to this part to evaluate whether a plan conforms with Sections 10727.2 and 10727.4 and is likely to achieve the sustainability goal for the basin covered by the groundwater sustainability plan.
- b) If a groundwater sustainability agency develops multiple groundwater sustainability plans for a basin, the department shall evaluate whether the plans conform with Sections 10727.2, 10727.4, and 10727.6 and are together likely to achieve the sustainability goal for the basin covered by the groundwater sustainability plans.
- c) The department shall evaluate whether a groundwater sustainability plan adversely affects the ability of an adjacent basin to implement their groundwater sustainability plan or impedes achievement of sustainability goals in an adjacent basin.

Water Code § 10733.8.

At least every five years after initial submission of a plan pursuant to Section 10733.4, the department shall review any available groundwater sustainability plan or alternative submitted in accordance with Section 10733.6, and the implementation of the corresponding groundwater sustainability program for consistency with this part, including achieving the sustainability goal. The department shall issue an assessment for each basin for which a plan or alternative has been submitted in accordance with this chapter, with an emphasis on assessing progress in achieving the sustainability goal within the basin. The assessment may include recommended corrective actions to address any deficiencies identified by the department.

GSP Regulations § 355.6. Periodic Review of Plan by Department

- a)** The Department shall periodically review an approved Plan to ensure the Plan, as implemented, remains consistent with the Act and in substantial compliance with this Subchapter, and is being implemented in a manner that will likely achieve the sustainability goal for the basin.
- b)** The Department shall evaluate approved Plans and issue an assessment at least every five years. The Department review shall be based on information provided in the annual reports and the periodic evaluation of the Plan prepared and submitted by the Agency.
- c)** The Department shall consider the following in determining whether a Plan and its implementation remain consistent with the Act:
 - 1.** Whether the exceedances of any minimum thresholds or failure to meet any interim milestones are likely to affect the ability of the Agency to achieve the sustainability goal for the basin
 - 2.** Whether the Agency is implementing projects and management actions consistent with the Plan, or that the Agency has demonstrated that actions described in the Plan have been rendered unnecessary based on changing basin conditions or an improved understanding of basin conditions.
 - 3.** Whether the Agency is addressing data gaps and reducing the levels of uncertainty identified in the Plan.
 - 4.** Whether the Plan continues to satisfy the criteria described in Section 355.4.[Criteria for Plan Evaluation]
- d)** The Department shall issue a written assessment of the review of the Plan, which shall be posted on the Department's website. The assessment shall include a determination of the status of the Plan, as follows:
 - 1.** Approved. The Department shall approve the implementation of a Plan that remains in conformance with the requirements of the Act and is in substantial compliance with this Subchapter, based on the criteria described in this Section.
 - 2.** Incomplete. The Department has determined that the Plan as implemented has one or more deficiencies that preclude approval, but which may be capable of being corrected by the Agency in a timely manner. An incomplete Plan may be completed and resubmitted to the Department for evaluation as follows:
 - A)** The Department shall identify deficiencies in the Plan as implemented, and may recommend corrective actions to address those deficiencies.
 - B)** The Department may consult with the Agency to determine the amount of time needed by the Agency to propose projects or management actions to address any deficiencies, not to exceed 180 days from the date the Department issues its assessment.
 - 3.** Inadequate. The Department shall disapprove the implementation of a Plan if the Department, after consultation with the board, determines that a Plan is inadequate in accordance with Section 355.2.
- e)** The Department may request from the Agency any information the Department deems necessary to evaluate the progress toward achieving the sustainability goal and the potential for adverse effects on adjacent basins.
- f)** The Department may evaluate the implementation of a Plan at any time to determine whether the Plan is consistent with the objectives of the Act and in substantial compliance with this Subchapter.

EXHIBIT 2.

DRAFT ANNOTATED OUTLINE OF 5-YEAR ASSESSMENT REPORT FOR THE GMP

EXECUTIVE SUMMARY

This section will provide a high-level overview of GSP implementation activities, address whether implementation is on track for reaching the basin's sustainability goal and provide an overview of significant new information received and included in the assessment.

SECTION 1. BACKGROUND & OBJECTIVES

1.1 Background on the Judgment/GMP

1.2 DWR Requirements for 5-year Assessment of GMP

1.3 Objective of the 5-Year GMP Assessment Report

1.4 Report Organization

SECTION 2. STATUS OF PROJECTS AND MANAGEMENT ACTIONS

DWR Requirement(s):

Title 23 § 356.4 (b): A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions.

Description of Section:

The GMP was drafted prior to the Judgment as a draft GSP. Together, the Judgment and GMP represent the Physical Solution for the Basin that will achieve sustainable groundwater management; however, the Judgment controls over and supersedes any contrary provisions contained in the GMP. There are certain management actions in the Judgment that replace the specific PMAs listed in the GMP. Table 1 in this section will describe the relationship between the management actions in the Judgment and the PMAs in the GMP. Each of the management actions in the Judgment will be described along with: implementation status; effects on groundwater conditions due to implementation; and progress made toward sustainability. Any additions, subtractions, or modifications to management actions will be described along with supporting information regarding the change to the management action.

2.1 Summary of Management Actions in the Judgment

2.2. Summary of PMAs in the GMP

2.3 Relationship between Judgment Management Actions and GMP PMAs

2.4 Implementation of Judgment Management Actions and effects on Groundwater Conditions

Section 2 Supporting Information:

- Table 1. Cross-Walk of Judgment Management Actions vs. GMP PMAs

SECTION 3. ADMINISTRATIVE, LEGAL, AND COORDINATION ACTIVITIES

DWR Requirement(s):

Title 23 § 356.4:

(g): *A description of relevant actions taken by the Agency, including a summary of regulations or ordinances related to the Plan.*

(h): *Information describing any enforcement or legal actions taken by the Agency in furtherance of the sustainability goal for the basin.*

(j): *Where appropriate, a summary of coordination that occurred between multiple Agencies in a single basin, Agencies in hydrologically connected basins, and land use agencies.*

Description of Section:

This section describes the legal actions taken by the Watermaster, the regulations and ordinances, Watermaster resolutions, coordination efforts with other agencies, and public outreach efforts.

3.1 Legal Actions

3.1.1 Judgment

3.2 Regulations and Ordinances

3.3 Coordination with Other Agencies

3.3.1 County of San Diego

3.3.2 Borrego Water District

3.4 Outreach and Engagement

3.4.1 Public Outreach Efforts

Open House

Borrego Days

Public Comment Opportunities

3.4.2 Prop 68 Grant Process

3.4.3 Monitoring Program Outreach and Engagement

SECTION 4. NEW INFORMATION

DWR Requirement(s):

Title 23 § 356.4 (f): *A description of significant new information that has been made available since Plan adoption or amendment, or the last five-year assessment. The description shall also include whether new*

information warrants changes to any aspect of the Plan, including the evaluation of the basin setting, measurable objectives, minimum thresholds, or the criteria defining undesirable results.

Description of Section:

This section describes any new information, including significant new data, that has been acquired during the 5-year assessment period. The discussion will include whether new information warrants changes to any aspect of the Plan, including the evaluation of the basin setting, measurable objectives, minimum thresholds, or the criteria defining undesirable results.

The table below is an example provided by the DWR of a method for summarizing the types of significant new information collected and how to reference that information in the applicable sections:

Significant New Information (e.g., new monitoring data, reports, coordination with other agencies, data provided by the Department)	Description	Aspects of Plan Affected (e.g., Basin Setting, Sustainable Management Criteria, Projects and Management Actions, Monitoring Network, Coordination Agreement)	Warrant Change to Any Aspects of the Plan (Yes/No) If yes, include section of the Plan

4.1 Data Regularly Collected by the Watermaster

Examples of data and information include:

- Groundwater Pumping Data
- Groundwater-Level Monitoring Data
- Groundwater-Quality Monitoring Data

4.2 Sustainable Yield and Borrego Valley Hydrologic Model

Examples of data and information include:

- Results from the BVHM
- Water Budget and Sustainable Yield
- Updated aquifer properties

4.3 Other information not regularly collected by the Watermaster

Examples of data and information include:

- InSAR data
- TSS wells
- Pumping test results from Rams Hill wells
- New borehole/well information

4.4 Other Studies

Examples of data and information include:

- Groundwater Dependent Ecosystems study

SECTION 5. CURRENT GROUNDWATER CONDITIONS VS. SUSTAINABLE MANAGEMENT CRITERIA

DWR Requirement(s):

Title 23 § 356.4 (a): *A description of current groundwater conditions for each applicable sustainability indicator relative to measurable objectives, interim milestones, and minimum thresholds.*

Description of Section:

This section will demonstrate progress towards achieving the Sustainability Goal of the Basin. If progress is not being made, it will provide an explanation of the reasons and how to get the basin on track to achieving sustainability. If changes or additions to Sustainability Indicators and Sustainable Management Criteria are necessary, describe the proposed changes.

The section is organized by each applicable Sustainability Indicator i) chronic lowering of groundwater levels, ii) reduction in groundwater storage, and iii) degraded water quality. For each Representative Monitoring Site, a figure is presented to show measured data vs. Minimum Thresholds, Measurable Objectives, and Interim Milestones. Trends will be discussed by management area.

5.1 Current Groundwater Conditions for Applicable Sustainability Indicators

5.1.1 Chronic Lowering of Groundwater Levels

5.1.1.1 Description of Sustainable Management Criteria:

Representative Monitoring Sites

Minimum Thresholds

Measurable Objectives

Interim Milestones

5.1.1.2 Description of trends and current groundwater-level conditions compared to Sustainability Criteria

5.1.1.3 Assessment

Evaluation of Undesirable Results

Impacts to Beneficial Uses/Users

Impacts to other Sustainability Indicators

Other Impacts or Challenges

5.1.1.4 Recommended change(s) to the Sustainable Management Criteria

Section 5.1.1 Supporting Information:

- Table 2. Summary of Minimum Thresholds, Measurable Objectives, and Interim Milestones at Representative Monitoring Sites
- Appendix A. Time-series charts for each Representative Monitoring Site (2000 – 2040) showing:
 - Historical groundwater levels (2000-2023)
 - Minimum Thresholds
 - Measurable Objectives
 - Interim Milestones (2025, 2030, 2035)

5.1.2 Reduction in Groundwater Storage

5.1.2.1 Description of Sustainable Management Criteria:

Representative Monitoring Sites

Minimum Thresholds

Measurable Objectives

Interim Milestones

5.1.2.2 Description of trends and current groundwater storage conditions compared to Sustainability Criteria

5.1.2.3 Assessment

Evaluation of Undesirable Results

Impacts to Beneficial Uses/Users

Impacts to other Sustainability Indicators

Other Impacts or Challenges

5.1.2.4 Recommended change(s) to the Sustainable Management Criteria

Section 5.1.2 Supporting Information:

- Table 3. Summary of Minimum Thresholds, Measurable Objectives, and Interim Milestones
- Figure 1. Time-series chart of the change in groundwater storage vs. Sustainability Criteria

5.1.3 Degraded Water Quality

5.1.3.1 Description of Sustainable Management Criteria:

Representative Monitoring Sites

Minimum Thresholds

Measurable Objectives

Interim Milestones

5.1.3.2 Description of trends and current groundwater-quality conditions compared to Sustainability Criteria

5.1.3.3 Assessment

Evaluation of Undesirable Results

Impacts to Beneficial Uses/Users

Impacts to other Sustainability Indicators

Other Impacts or Challenges

5.1.3.4 Recommended change(s) to the Sustainable Management Criteria

Section 5.1.3 Supporting Information:

- Table 4. Summary of Minimum Thresholds, Measurable Objectives, and Interim Milestones at Representative Monitoring Sites
- Appendix B. Time-series chart for each Representative Monitoring Site (2000 – 2040) showing:
 - Historical groundwater-quality (2000-2023)
 - Minimum Thresholds
 - Measurable Objectives
 - Interim Milestones (2025, 2030, 2035)

5.2 Current Groundwater Conditions for Sustainability Indications Deemed Not Applicable in the 2020 GMP

5.2.1 Land Subsidence

5.2.2 Depletions of Interconnected Surface Water

SECTION 6. MONITORING PROGRAM

DWR Requirement(s):

Title 23 § 356.4 (e): *A description of the monitoring network within the basin, including whether data gaps exist, or any areas within the basin are represented by data that does not satisfy the requirements of Sections 352.4 and 354.34(c). The description shall include the following:*

- (1) *An assessment of monitoring network function with an analysis of data collected to date, identification of data gaps, and the actions necessary to improve the monitoring network, consistent with the requirements of Section 354.38.*
- (2) *If the Agency identifies data gaps, the Plan shall describe a program for the acquisition of additional data sources, including an estimate of the timing of that acquisition, and for incorporation of newly obtained information into the Plan.*
- (3) *The Plan shall prioritize the installation of new data collection facilities and analysis of new data based on the needs of the basin.*

Description of Section:

This section will summarize the Watermaster's updated Groundwater Monitoring Plan and reference Appendix C.

Section 6 Supporting Information:

- Figure 2. Map of groundwater-level monitoring program (including gaps)
- Figure 3. Map of groundwater-quality monitoring program (including gaps)
- Appendix C. Groundwater Monitoring Plan

SECTION 7. BASIN SETTING BASED ON NEW INFORMATION

DWR Requirement(s):

Title 23 § 356.4(d): *An evaluation of the basin setting in light of significant new information or changes in water use, and an explanation of any significant changes. If the Agency's evaluation shows that the basin is experiencing overdraft conditions, the Agency shall include an assessment of measures to mitigate that overdraft.*

Description of Section:

This section provides an evaluation of the basin setting based on new information or changes in basin water use. It should explain the reasons behind the improved understanding of the basin setting, such as significant new information and data or model results.

7.1 Hydrogeologic Conceptual Model

7.2 Groundwater Conditions

7.3 Water/Land Use Changes and Associated Budget

7.4 Updates to the BVHM

SECTION 8. CORRECTIVE ACTIONS

Description of Section:

The Watermaster has not yet received the DWR's comments and/or corrective actions on the Judgment/GMP that was submitted to the DWR as an alternative GSP in June 2021. Comments and/or corrective actions are received from the DWR will be described and addressed in this section.

SECTION 9. SUMMARY OF COMPLETED OR PROPOSED PLAN UPDATES

DWR Requirement(s):

Title 23 § 356.4:

(c): *Elements of the Plan, including the basin setting, management areas, or the identification of undesirable results and the setting of minimum thresholds and measurable objectives, shall be reconsidered and revisions proposed, if necessary.*

(i): *A description of completed or proposed Plan amendments.*

Description of Section:

This section summarizes the key take-aways from the assessment, any proposed updates to the GMP, and should include a brief overview of next steps and how the Management Actions will continue moving the Basin towards the Sustainability Goal.

Exhibit 3
Responses to TAC Comments/Recommendations on the 5-Year Assessment of the Groundwater Management Plan (GMP)

TAC Comments/Recommendations	TAC Members					Technical Consultant Responses
	AAWARE Bob Wagner	BWD Trey Driscoll	County of San Diego Jim Bennett	T2 Borrego Tom Watson	Roadrunner Club John Peterson	
Reassess Minimum Thresholds for the Chronic Lowering of Groundwater Levels						
Assess Minimum Thresholds established for each well and potentially revise			X			The Minimum Thresholds established for Representative Monitoring Sites will be re-evaluated and revised (if appropriate) during the 5-year assessment.
Identify if new wells can be used to fill any identified data gaps			X			Where applicable, data gaps identified in the GMP will be filled with new wells as outlined in the update Groundwater Monitoring Plan.
Update discussion of monitoring and management programs in Section 2.1 Water Resources Monitoring and Management Programs						
Several San Diego County programs have expired and/or changed since the development of the GMP. The GMP should be updated to reflect these changes.			X ¹			The assessment report will address any changes to monitoring and management programs applicable to the Basin.
Reduce reliance on the BVHM						
Metered pumping data and monitoring data from the groundwater-level and groundwater-quality monitoring programs should be used and the reliance on the BVHM could be reduced.	X					The Watermaster's expanded monitoring programs of pumping, groundwater levels, and groundwater quality will be addressed in the 5-Year Assessment Report. The Judgment requires the use of the BVHM to redetermine the Sustainable Yield and the Board has directed its use during this Evaluation Period.
Follow the DWR's Suggested Periodic Evaluation Annotated Outline						
Follow the DWR's Suggested Periodic Evaluation Annotated Outline and begin with compiling new information for Table 7 in the Annotated Outline		X				DWR's Suggested Periodic Evaluation Annotated Outline will be used to develop the draft outline of the 5-year GMP Assessment Report.
No Comments						
	X ²			X ³	X	

Notes:

1. Specific changes include: i) updating the San Diego County Groundwater Ordinance, ii) removing discussion on the extinct Demand Offset Program, and iii) removing discussion on the extinct County DPLU Policy Regarding Cumulative Impact Analyses for Borrego Valley Groundwater Use
2. No specific comments or exceptions were provided on the approach outlined in the November 1, 2023 TAC memo.
3. No specific comments received in correspondence.