COUNTY OF SACRAMENTO Inter-Department Correspondence

April 12, 2016

TO:

Michael Peterson, Director

Department of Water Resources

FROM:

Florence Evans, Interim Clerk

Board of Supervisors

SUBJECT:

Item #56- April 5, 2016 Agenda

Sustainable Groundwater Management Act Update

The Board of Supervisors, at the meeting held on Tuesday, April 5, 2016, took the following action:

Approved staff recommendations as amended as follows:

- 1. Sacramento County Water Agency Principle No. 2 deleted and renumbered accordingly;
- 2. Sacramento County Water Agency Principle No. 3 revised to read SCWA will request that basin boundary modification decisions by State Department of Water Resources within Zone 40 not be determined for a period of six months to allow the request's science, sustainable management implications, and impacts to the Zone 40 Master Plan, Capital Improvement Plan, and Conjunctive Use program to be discussed, understood, and coordinated with all interested stakeholders;
- 3. Sacramento County Principle No. 3 revised to read Sacramento County will request that basin boundary modification decisions by State Department of Water Resources with Sacramento County not be determined for a period of six months to allow the request's science and sustainable management implications are discussed, understood, and coordinated with all interested stakeholders.

cc: Rob Leonard, Chief Deputy County Executive, MS

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COUNTY OF SACRAMENTO CALIFORNIA

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APPROVED

By RUSO # 2016 - 0228

For the Agenda of: April 5, 2016 11:00 AM

To:

Board of Supervisors

Board of Directors

From:

Department of Water Resources

Sacramento County Water Agency

Subject:

Sustainable Groundwater Management Act Update

Supervisorial

District:

All

Contact:

Kerry Schmitz, Water Supply Division Chief, 874-4681

Overview

On November 10, 2015, Department of Water Resources (DWR) staff presented information about the Sustainable Groundwater Management Act of 2014 (SGMA) to the Board of Supervisors (Board) followed by an update presented on March 22, 2016. SGMA provides a framework for sustainable management of groundwater by local water supply, water management and land use agencies (local agencies). DWR staff have been meeting with interested stakeholders in the groundwater sub-basins within Sacramento County to better understand and build upon current and past groundwater management efforts, and to observe local agency processes in achieving SGMA compliance. Given the increasing number of SGMA-related activities in the region, DWR staff is seeking to update your Boards on these activities and to recommend approval of groundwater principles (slightly modified from the March 22, 2016 proposal) to guide actions moving forward.

Recommendations

1. Approve the attached resolutions to provide the necessary guidance to DWR staff as they continue their efforts in meeting SGMA responsibilities on behalf of the County and the Water Agency.

Measures/Evaluation

Not applicable to this agenda item.

Fiscal Impact

There is no fiscal impact associated with this item. However, DWR staff and technical resources are being directed toward SGMA related activities as local agencies and interested stakeholders begin the establishment of GSAs as required under SGMA. Future actions or approvals with fiscal impacts will be brought before the appropriate Board for consideration.

After receipt of any Basin Boundary Modification request from Sloughhouse, State DWR will review the submittal for a determination of completeness. Upon that determination, SCWA and the County would only have 30 days to review the analysis, determine impacts, and further discuss and collaborate with Sloughhouse and various other stakeholders on implications to SCGA. Given the potential impacts to Zone 40's conjunctive use program and the Keifer Landfill, staff requests authority to ask that State DWR delay the Sloughhouse boundary modification decision until a thorough analysis can be completed and all stakeholders, including SCGA, SCWA and the County, can fully vet the proposal.

The SGMA legislation provides a process identified as an "Alternative Plan" that acknowledges active on-going groundwater management programs. The requirements for taking advantage of the Alternative Plan process seem to be a good match for SCGA and would recognize the efforts put into the Water Forum process including the time, cost, regional and state collaboration, and individual agency commitments that became the Water Forum Agreement. In recognition of the work done as part of the Water Forum process, the SCGA Board directed their staff to look into pursuing an "Alternative Plan" versus development of a GSP. If accepted by the State, the Alternative Plan process would significantly reduce the time and cost for SCGA and the South American sub-basin to become SGMA compliant by 2022. If SCGA moves forward with the Alternative Plan, SCGA may support local agencies in the Delta with a basin boundary modification to shift a portion of the South American sub-basin into the Solano sub-basin (see **Attachment 5** for a map showing potential basin boundary modification in the Delta).

Cosumnes Sub-Basin

Currently, the Cosumnes (Cosumnes) sub-basin contains areas in Sacramento, Amador, and San Joaquin counties. San Joaquin County has expressed an interest in pursuing a basin boundary modification that would align with their jurisdictional boundaries (see **Attachment 3**). Since this action is based on moving a scientific boundary to a jurisdictional boundary, the requirements for local agency agreement are much higher. To date Sacramento County staff have not objected to this basin boundary modification and have expressed an interest in working with San Joaquin County as they consider this action.

In the Sacramento County portion of the sub-basin, the Sloughhouse Board of Directors has proposed to create five separate GSAs over a large portion of the Cosumnes sub-basin (see **Attachment 6**) with areas potentially overlapping OHWD, Galt Irrigation District, and Clay Water District. The remaining portion of the sub-basin includes the City of Galt, a portion of Galt Irrigation District, and area within unincorporated Sacramento County, for which the County would be the default groundwater sustainability agency. OHWD, Galt Irrigation District, and Clay Water District have requested to be excluded from Sloughhouse's proposed GSA.

Solano Sub-Basin

The Solano (Solano) sub-basin contains portions of Sacramento, Yolo and Solano counties (see **Attachment 1**). Staff has been coordinating with both Solano and Yolo counties in addition to other stakeholders in the basin. Yolo County, in cooperation with the Yolo County Flood Control and Water Conservation District, is in the initial stages of a basin boundary

modification to align with their county jurisdictional boundary. This action would not impact Sacramento County's groundwater management efforts. Solano County Water Agency is taking a proactive role for SGMA implementation in Solano County. The Sacramento County portion of the Solano sub-basin includes the Delta, an area characterized by low groundwater use because of long established surface water rights. Two groups within the County portion of this sub-basin have expressed an interest in participating in groundwater management efforts:Local Agencies of the North Delta (LAND) and North Delta Water Agency (NDWA). The efforts of these two groups are very early in the process. A basin boundary adjustment coordinated with SCGA (described in the section on the South American Sub-Basin above), if requested and approved, would increase the size of the County's area in the Solano sub-basin. This adjustment has been discussed with Solano and Yolo County interests, and has been specifically requested by representatives of LAND.

Sacramento County Guidance for Engagement in SGMA Compliance

As local agencies and stakeholders work toward SGMA compliance over the next decade, Sacramento County, as a land use agency, will be required to take certain actions and provide input as boundaries are modified, GSAs are created, and GSPs are developed and implemented. Staff recommends that Sacramento County adopt groundwater management principles that help support county-wide SGMA compliance, support and expand successful existing groundwater management efforts, build new groundwater management entities that are representative of interested stakeholders in their respective sub-basins, and are consistent with those principles adopted by the County Board as part of the Water Forum Process. Staff recommends that the County Board adopt the attached resolutions that articulate the following guidance:

- County 1. Sacramento County supports existing and new groundwater management actions and efforts in the County as they work to comply with SGMA provided these efforts are consistent with the principles defined in the Water Forum Agreement and Successor Effort. These principles include broad representation of all interested stakeholders, management based on sound science, conjunctive use of groundwater and surface water supplies and promotion of countywide cooperation in groundwater management.
- **County 2.** Sacramento County as a local land use agency desires to participate in any GSA formation and GSP development process within its unincorporated areas. The level of participation is to be determined through a collaborative stakeholder process consistent with Water Forum Agreement principles and SGMA.
- **County 3.** Sacramento County will request that basin boundary modification decisions by State DWR within Sacramento County be delayed until the request's science and sustainable management implications are discussed, understood, and coordinated with all interested stakeholders.

SCWA Guidance Principles for Engagement in SGMA Compliance

While SCWA has many of the same goals and interests as Sacramento County, SCWA's groundwater management interests are slightly different because of their role as one of the County's largest water purveyors in the South American sub-basin and to a smaller extent in the North American and Solano sub-basins. SCWA should be prepared to take actions to protect their interests and to provide input as GSAs move forward with SGMA compliance.

Staff recommends that the SCWA Board of Directors adopt the attached resolution that articulates the following principles:

- SCWA 1. SCWA supports existing and new groundwater management efforts and actions within the SCWA service area that are consistent with the principles defined in the Water Forum Agreement and Successor Effort. These principles include broad representation of all interested stakeholders, management based on sound science, conjunctive use of groundwater and surface water supplies and promotion of countywide cooperation in groundwater management.
- SCWA 2. SCWA supports sustainable groundwater management efforts and actions that do not interfere with the implementation of the Zone 40 Conjunctive Use program in the South American sub-basin as defined in the SCWA Zone 40 Master Plan and Water Forum Agreement and Successor Effort.
- SCWA 3. SCWA desires to be a full member of any GSA formed within a SCWA service area.
- SCWA 4. SCWA will request that basin boundary modification decisions by State DWR within Zone 40 be delayed until the request's science, sustainable management implications, and impacts to the Zone 40 Master Plan, Capital Improvement Plan, and Conjunctive Use program are discussed, understood, and coordinated with all interested stakeholders.

FINANCIAL ANALYSIS:

There is no fiscal impact associated with this item. However, DWR staff and technical resources are being directed toward SGMA related activities as local stakeholders and agencies begin the establishment of GSAs required under SGMA. Future actions or approvals with fiscal impacts will be brought before the appropriate Board for consideration.

Respectfully submitted,

APPROVED:

NAVDEEP S. GILL

Interim County Executive

MICHAEL L. PETERSON, Director Department of Water Resources

ROBERT B. LEONARD
Chief Deputy County Executive

Attachments:

RES 1 – County Groundwater RES 2 – SCWA Groundwater

COUNTY OF SACRAMENTO

RESOLUTION NO. 2016-0228

RESOLUTION ADOPTING SACRAMENTO COUNTY GROUNDWATER MANAGEMENT PRINCIPLES TO ENSURE CONSISTENCY WITH WATER FORUM EFFORT AND COMPLIANCE WITH THE SUSTAINABLE GROUNDWATER MANAGEMENT ACT OF 2014

WHEREAS, Sacramento County is a signatory of the Water Forum Agreement and an active participant in the Water Forum Successor Effort; and

WHEREAS, the Water Forum Agreement contains a chapter dedicated to groundwater management titled the "Groundwater Management Element" which defines how groundwater is integrated into overall water management in the Sacramento region and provides the foundation for groundwater management and Purveyor Specific Agreements describing benefits and necessary commitments to receive those benefits; and

WHEREAS, the County participated in the whole of the Water Forum process, including in the creation of the Sacramento Central Groundwater Agency (SCGA) and as an active member since SCGA's formation and adoption of the Central Sacramento County Groundwater Management Plan in 2006;

WHEREAS, in 2014, the California Legislature signed the Sustainable Groundwater Management Act (SGMA) into law;

WHEREAS, SGMA provides a framework for sustainable groundwater management by local agencies;

WHEREAS, SGMA allows for flexibility in groundwater management, but requires coordination between local agencies and interested parties in the formation of groundwater sustainability agencies (GSA) followed by the development and implementation of groundwater sustainability plans (GSP);

WHEREAS, the County has an interest in ensuring that effective sustainable groundwater management programs are established in compliance with the requirements of SGMA and consistent with the Water Forum principles for collaboration and coordination;

WHEREAS, County staff recommend that the Board of Supervisors adopt Groundwater Management Principles to help guide decisions and actions moving forward to comply with SGMA;

- **NOW, THEREFORE, BE IT RESOLVED** The Sacramento County Board of Supervisors adopts the following Groundwater Management Principles (Principles) to guide County staff actions with respect to SGMA implementation.
- County 1. Sacramento County supports existing and new groundwater management actions and efforts in the County as they work to comply with SGMA provided these efforts are consistent with the principles defined in the Water Forum Agreement and Successor Effort and recognize the significant regional investment associated with these actions. These principles include broad representation of all interested stakeholders, management based on sound science, conjunctive use of groundwater and surface water supplies and promotion of countywide cooperation in groundwater management.
- County 2. Sacramento County as a local land use agency desires to participate in any GSA formation and GSP development process within its unincorporated areas. The level of participation is to be determined through a collaborative stakeholder process consistent with Water Forum Agreement principles and SGMA.
- County 3. Sacramento County will request that basin boundary modification decisions by State Department of Water Resources within Sacramento County not be determined for a period of six months to allow the request's science and sustainable management implications to be discussed, understood, and coordinated with all interested stakeholders.

Page 3

On a motion by Supervisor Nottoli, seconded by Supervisor Kennedy, the foregoing Resolution was passed and adopted by the Board of Supervisors of the County of Sacramento, State of California, this 5th day of April, 2016, by the following vote, to wit:

AYES:

Supervisors,

Kennedy, Nottoli, Peters, Serna

NOES:

Supervisors,

None

ABSENT:

Supervisors,

MacGlashan

ABSTAIN:

Supervisors,

None

RECUSAL:

Supervisors,

None

(PER POLITICAL REFORM ACT (§ 18702.5.)

Vice Chair of the Board of Supervisors of Sacramento County, California



ATTEST: (

Clerk, Board of Supervisors

In accordance with Section 25103 of the Government Code of the State of California a copy of the document has been delivered to the Chair of the Board of Supervisors, County

BOARD OF SUPERVISORS

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By: Deputy Clerk, Board of Supermora

BOARD OF SUPERVISORS

CLERK OF THE BOARD

SACRAMENTO COUNTY WATER AGENCY

RESOLUTION NO. WA-2927

RESOLUTION ADOPTING GROUNDWATER MANAGEMENT PRINCIPLES TO PROTECT SACRAMENTO COUNTY WATER AGENCY INTERESTS AND ENSURE COMPLIANCE WITH THE SUSTAINABLE GROUNDWATER MANAGEMENT ACT OF 2014

WHEREAS, Sacramento County Water Agency (SCWA) serves a combination of groundwater and surface water to customers in Sacramento County; and

WHEREAS, SCWA is a signatory of the Water Forum Agreement and an active participant in the Water Forum Successor Effort; and

WHEREAS, throughout the Water Forum process, SCWA participated in the creation of the Sacramento Central Groundwater Agency (SCGA) and has been an active voice in SCGA since the adoption of the Central Sacramento County Groundwater Management Plan in 2006; and

WHEREAS, in 2014 the California Legislature signed the Sustainable Groundwater Management Act (SGMA) into law which provides a framework for sustainable management of groundwater by local agencies; and

WHEREAS, SGMA requires coordination and collaboration among stakeholders in the groundwater sub-basins as Groundwater Sustainability Agencies (GSAs) are created and Groundwater Sustainability Plans (GSPs) are adopted; and

WHEREAS, SCWA has significant interest in the sustainable management of groundwater in those sub-basins within its service areas, and has a responsibility to SCWA customers to ensure that SCWA resources are wisely and efficiently used; and

WHEREAS, SCWA's Zone 40 Conjunctive Use Program is integral to the successful management of groundwater in the South American sub-basin; and

WHEREAS, SCWA staff recommends that the Board of Directors adopt the following principles to guide staff actions in the pursuit of sustainable groundwater management and compliance with SGMA.

NOW, THEREFORE, BE IT RESOLVED the SCWA Board of Directors adopts the following Groundwater Management Principles (Principles) to guide staff actions with respect to SGMA implementation.

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SCWA 1. SCWA supports existing and new groundwater management efforts and actions within the SCWA service area that are consistent with the principles defined in the Water Forum Agreement and Successor Effort and recognize the significant regional investment associated with these actions. These principles include broad representation of all interested stakeholders, management based on sound science, conjunctive use of groundwater and surface water supplies and promotion of countywide cooperation in groundwater management.

SCWA 2. SCWA desires to be a full voting member of any GSA formed within a SCWA Zone 40 or Zone 41 service area.

SCWA 3. SCWA will request that basin boundary modification decisions by State Department of Water Resources within Zone 40 not be determined for a period of six months to allow the request's science, sustainable management implications, and impacts to the Zone 40 Master Plan, Capital Improvement Plan, and Conjunctive Use program to be discussed, understood, and coordinated with all interested stakeholders.

ON A MOTION by Director Nottoli, and seconded by Director Kennedy, the foregoing resolution was passed and adopted by the Board of Directors of SCWA of the County of Sacramento, State of California, this 5th day of April, 2016, by the following vote, to wit:

AYES:

Directors,

Kennedy, Nottoli, Peters, Serna

NOES:

Directors,

None

ABSENT:

Directors,

MacGlashan

ABSTAIN:

Directors,

None

RECUSAL:

Directors,

None

PER POLITICAL REFORM ACT (§ 18702.5.)

Vice Chair of the Board of Directors of the Sacramento County Water Agency

By: Studdi

Deputy Clerk, Board of Directors

Clerk of the Board of Supervisors of Sacramento County, California, and Ex officio Secretary of the Board of

Directors of the Sacramento County Water Agency

BOARD OF DIRECTORS

APR 05 2016

CLERK OF THE BOARD

COUNTY OF SACRAMENTO

RESOL	LUTION	NO.	

RESOLUTION ADOPTING SACRAMENTO COUNTY GROUNDWATER MANAGEMENT PRINCIPLES TO ENSURE CONSISTENCY WITH WATER FORUM EFFORT AND COMPLIANCE WITH THE SUSTAINABLE GROUNDWATER MANAGEMENT ACT OF 2014

WHEREAS, Sacramento County is a signatory of the Water Forum Agreement and an active participant in the Water Forum Successor Effort; and

WHEREAS, the Water Forum Agreement contains a chapter dedicated to groundwater management titled the "Groundwater Management Element" which defines how groundwater is integrated into overall water management in the Sacramento region and provides the foundation for groundwater management and Purveyor Specific Agreements describing benefits and necessary commitments to receive those benefits; and

WHEREAS, the County participated in the whole of the Water Forum process, including in the creation of the Sacramento Central Groundwater Agency (SCGA) and as an active member since SCGA's formation and adoption of the Central Sacramento County Groundwater Management Plan in 2006;

WHEREAS, in 2014, the California Legislature signed the Sustainable Groundwater Management Act (SGMA) into law;

WHEREAS, SGMA provides a framework for sustainable groundwater management by local agencies;

WHEREAS, SGMA allows for flexibility in groundwater management, but requires coordination between local agencies and interested parties in the formation of groundwater sustainability agencies (GSA) followed by the development and implementation of groundwater sustainability plans (GSP);

WHEREAS, the County has an interest in ensuring that effective sustainable groundwater management programs are established in compliance with the requirements of SGMA and consistent with the Water Forum principles for collaboration and coordination;

WHEREAS, County staff recommend that the Board of Supervisors adopt Groundwater Management Principles to help guide decisions and actions moving forward to comply with SGMA;

- NOW, THEREFORE, BE IT RESOLVED The Sacramento County Board of Supervisors adopts the following Groundwater Management Principles (Principles) to guide County staff actions with respect to SGMA implementation.
- County 1. Sacramento County supports existing and new groundwater management actions and efforts in the County as they work to comply with SGMA provided these efforts are consistent with the principles defined in the Water Forum Agreement and Successor Effort and recognize the significant regional investment associated with these actions. These principles include broad representation of all interested stakeholders, management based on sound science, conjunctive use of groundwater and surface water supplies and promotion of countywide cooperation in groundwater management.
- County 2. Sacramento County as a local land use agency desires to participate in any GSA formation and GSP development process within its unincorporated areas. The level of participation is to be determined through a collaborative stakeholder process consistent with Water Forum Agreement principles and SGMA.
- County 3. Sacramento County will request that basin boundary modification decisions by State Department of Water Resources within Sacramento County be delayed until the request's science and sustainable management implications are discussed, understood, and coordinated with all interested stakeholders.

On a	motion by Supervisor	, seconded by Supervisor,
the foregoing	Resolution was passed and adopted by	y the Board of Supervisors of the County of
Sacramento,	State of California, this 5th day of April	l, 2016, by the following vote, to wit:
AYES:	Supervisors,	
NOES:	Supervisors,	
ABSENT:	Supervisors,	
ABSTAIN:	Supervisors,	
RECUSAL:	Supervisors, DRM ACT (§ 18702.5.)	
		Chair of the Board of Supervisors of Sacramento County, California
(SEAL)		
ATTEST: _	Clerk, Board of Supervisors	

SACRAMENTO COUNTY WATER AGENCY

RESOLUTION NO. WA-

RESOLUTION ADOPTING GROUNDWATER MANAGEMENT PRINCIPLES TO PROTECT SACRAMENTO COUNTY WATER AGENCY INTERESTS AND ENSURE COMPLIANCE WITH THE SUSTAINABLE GROUNDWATER MANAGEMENT ACT OF 2014

WHEREAS, Sacramento County Water Agency (SCWA) serves a combination of groundwater and surface water to customers in Sacramento County; and

WHEREAS, SCWA is a signatory of the Water Forum Agreement and an active participant in the Water Forum Successor Effort; and

WHEREAS, throughout the Water Forum process, SCWA participated in the creation of the Sacramento Central Groundwater Agency (SCGA) and has been an active voice in SCGA since the adoption of the Central Sacramento County Groundwater Management Plan in 2006; and

WHEREAS, in 2014 the California Legislature signed the Sustainable Groundwater Management Act (SGMA) into law which provides a framework for sustainable management of groundwater by local agencies; and

WHEREAS, SGMA requires coordination and collaboration among stakeholders in the groundwater sub-basins as Groundwater Sustainability Agencies (GSAs) are created and Groundwater Sustainability Plans (GSPs) are adopted; and

WHEREAS, SCWA has significant interest in the sustainable management of groundwater in those sub-basins within its service areas, and has a responsibility to SCWA customers to ensure that SCWA resources are wisely and efficiently used; and

WHEREAS, SCWA's Zone 40 Conjunctive Use Program is integral to the successful management of groundwater in the South American sub-basin; and

WHEREAS, SCWA staff recommends that the Board of Directors adopt the following principles to guide staff actions in the pursuit of sustainable groundwater management and compliance with SGMA.

NOW, THEREFORE, BE IT RESOLVED the SCWA Board of Directors adopts the following Groundwater Management Principles (Principles) to guide staff actions with respect to SGMA implementation.

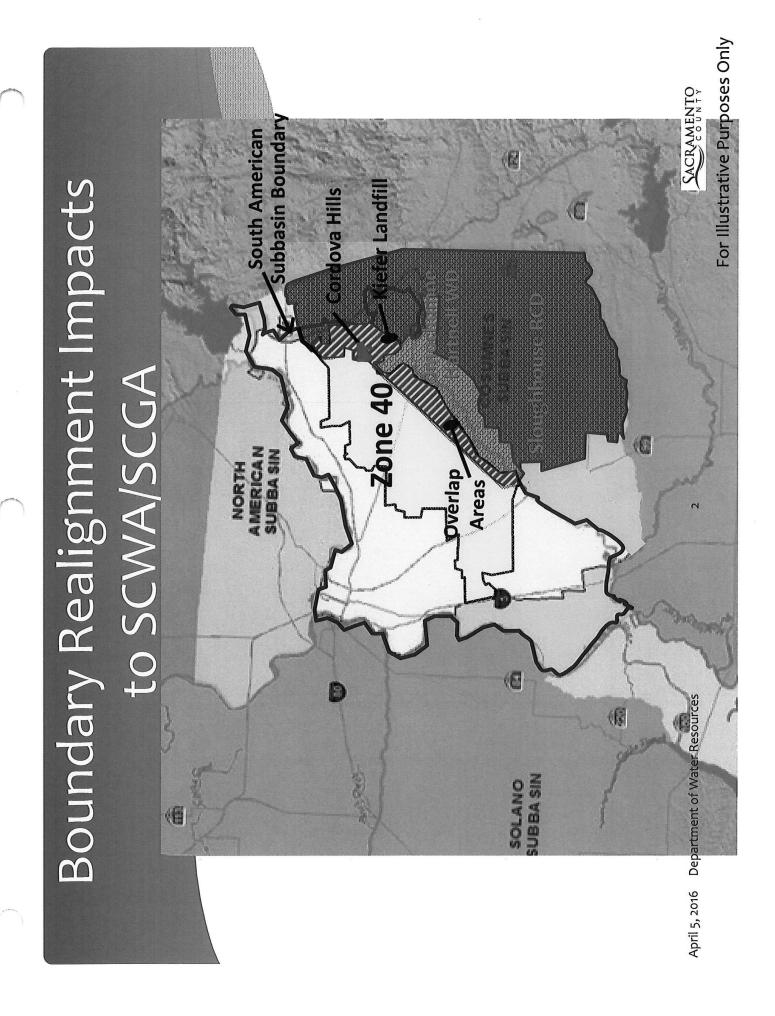
- SCWA 1. SCWA supports existing and new groundwater management efforts and actions within the SCWA service area that are consistent with the principles defined in the Water Forum Agreement and Successor Effort and recognize the significant regional investment associated with these actions. These principles include broad representation of all interested stakeholders, management based on sound science, conjunctive use of groundwater and surface water supplies and promotion of countywide cooperation in groundwater management.
- SCWA 2. SCWA supports sustainable groundwater management efforts and actions that do not interfere with the implementation of the Zone 40 Conjunctive Use program in the South American sub-basin as defined in the SCWA Zone 40 Master Plan, the Water Forum Agreement and Successor Effort, and the Central Sacramento County Groundwater Management Plan.
- SCWA 3. SCWA desires to be a full member of any GSA formed within a SCWA service area.
- SCWA 4. SCWA will request that basin boundary modification decisions by State Department of Water Resources within Zone 40 be delayed until the request's science, sustainable management implications, and impacts to the Zone 40 Master Plan, Capital Improvement Plan, and Conjunctive Use program are discussed, understood, and coordinated with all interested stakeholders.

ON	A MOTION by Director	, and seconded by Director
	, the foregoing resolution	was passed and adopted by the Board of
Directors of	SCWA of the County of Sacramento, St	ate of California, this 5th day of April, 2016,
by the follow	ving vote, to wit:	
AYES:	Directors,	
NOES:	Directors,	
ABSENT:	Directors,	
ABSTAIN:	Directors,	
RECUSAL:	Directors, FORM ACT (§ 18702.5.)	
	-	Chair of the Board of Supervisors of Sacramento County, California
(SEAL)		
S E	k of the Board of Supervisors of Sacramento County, California, and Ex officio Secretary of the Board of Directors of the Sacramento County Water	Agency

Groundwater Management Sacramento County April 5, 2016

Presentation to Sacramento County Board of Supervisors and Sacramento County Water Agency Board of Directors

Continued from March 22, 2016



Recommendations for the County

- are consistent with Water Forum principles in the * Support groundwater management actions that County to comply with SGMA
- development process as necessary to comply with Participate in any GSA formation and GSP SGMA
- until science is understood and is coordinated with * Ask DWR to delay basin boundary modifications all interested stakeholders

Recommendations for SCWA

- * Support groundwater management actions that are consistent with Water Forum principles in SCWA to comply with SGMA
- Support actions that do not interfere with the Zone 40 Conjunctive Use Program as defined by the Water
- Establish full membership in GSAs overlying SCWA's water service areas
- science and impacts to SCWA's Master Plan and CIP are Ask DWR to delay basin boundary modifications until understood and coordinated with all stakeholders

Consequences of Non-action

- adjustment process non-participation is * Inability to provide input into boundary assumed to be support
- on applications that have been rushed in * State may take significant actions based order to meet an unnecessary timeline
- County/SCWA interests as GSAs are being * Staff lacks the ability to formally protect formed