

DEID GSA/GSP policy points for stakeholder/public meetings

October-December 2018

Policy Points internal to the DEID Management Area:

Policy Point #1 - Existing operations are sustainable

DEID is sustainable in its current condition and operations that utilizes all available water sources including the subbasin sustainable yield (see water balance spreadsheet). This water balance includes recognition of future reductions in CVP supplies due to full implementation of the SJRRP. Other basis for continued sustainability are (1) current cropping patterns are largely maintained; (2) historic hydrology is repeated (1992-2011); (3) existing banking program continue at historic levels. The basis of current and continued sustainability does not include anticipated new projects that will capture CVP supplies historically transferred to others (16,382 af average annual, down to 11,024 af when adjusted for anticipated SJRRP losses). Section 5 of the GSP identifies those projects under consideration by the GSA. This water supply is also considered critical as a buffer for below normal hydrology and/or potential redirection of CVP supplies to the Exchange Contractors in critically dry years.

Sustainability operations selected alternative - Continuance of existing district and grower operations.

- Groundwater: No allocation of groundwater in any year type. Growers may use groundwater as necessary to complete their on-farm water balance after full use of available surface water supplies are made.
- Surface water in below normal water years: supplies will be prorated consistent with historic practices. Growers will be allowed to continue with intra-district transfers of surface water among growers.
- Surface water in normal or above normal years: the district will continue to manage the available surface water supplies on behalf of all water users as a whole as it has historically done. No individual allocation of surface water will occur.

Other alternatives were considered but ultimately determined by the GSA board as less desirable. Those other alternatives that were considered were:

- Continuance of existing district and grower operations with new regulations to mandate full use of available surface water supplies in all year types. There would be no groundwater allocation in this alternative (same as the preferred alternative) but in all year types, surface water would be allocated on an equal basis (total supply divided by total acreage) with growers required to purchase the allocation. Any unused water remaining in a grower's account at a specified date would be billed to the grower; an optional penalty could be added for non-use.
- A "free market" approach was also considered. The free market approach is based the recognition that a defined area is not currently sustainable, with growers needing an opportunity to procure individual water assets so that they may achieve sustainability for their specific operation. This would be accomplished through buying, selling, or otherwise moving groundwater (and potentially surface water) allocations among water users. That is unnecessary in the DEID management area; as demonstrated by DEID's water balance, all growers in the DEID management area are currently sustainable.

Policy Point #2 – Transfer of groundwater to areas outside of the DEID management area

Transfer of groundwater is not allowed to areas outside of the DEID management area so that the area can maintain sustainability. The sustainability calculation (water balance) demonstrates the management area’s sustainability which fully includes consumption of the sustainable yield. In order to maintain sustainability, all available groundwater must remain within the management area and no exportation of groundwater, credits or otherwise, outside of the management area are allowed. Further, the anticipated requests of transferring groundwater out of the management area would require allocation of the groundwater in the form of groundwater credits, requiring the implementation and maintenance of an allocation system, which would a significant cost to the GSA that would potentially benefit only a few individuals.

Policy Point #3 - Transitional pumping within the DEID Management Area

The sustainability calculation (water balance) demonstrates the management area’s sustainability which negates the need for any transitional pumping. Rather, growers will continue to be able to pump groundwater as necessary, consistent with Policy Point #1.

Policy Point #4 - Groundwater banking at the grower level

A stakeholder workshop held on this policy point yielded a consensus position that growers in DEID preferred to maintain the existing and historic practice that DEID will first use water available for banking to benefit the DEID management area growers as a whole. Specifically, stakeholders agreed that the top priority for use of available groundwater banking supplies should be to provide water to DEID’s in-district groundwater banking project(s).

Stakeholders further agreed that the second priority for available groundwater banking supplies should be for on-farm groundwater recharge that increases the groundwater allocation to all DEID landowners through a program offered by DEID. This remains an option and will be included “Section 5-Projects” of the DEID management area GSP.

Stakeholders also recommended a third priority, which was providing water for on-farm groundwater recharge that increases the groundwater allocation of an individual landowner through a program offered by DEID. However, consistent with Policy Point #1, the DEID management area is in a sustainable position, resulting in no need for individual groundwater banking or the accounting that would be required on an individual landowner basis. Because of this, the third priority was eliminated.

Policy Point #5 - Water measurement and metering

Installation of meters on all wellheads would require standardization of all well discharge piping, could involve relocation of existing grower irrigation equipment, and would include ongoing maintenance and repair. Due to the anticipated expense of installing and maintaining meters on all private wells in the DEID management area, the GSP will employ the use of remote sensing technology to measure crop use and actual net extraction of groundwater. This technology, known as LandSAT, will be the preferred measurement method for all agricultural lands. For municipal and industrial groundwater users that are greater than de minimus users (less than 2 acre-feet per year) well-head meters will be required. Implementation details for a later determination: (1) Cost of the meter and installation; (2) inventory of private wells in the District; (3) require notice to the GSA for any new well installed in the GSA.

Policy Point #6 – Cost and Funding of SGMA implementation

The initial cost centers that have been identified that are associated with SGMA/GSP implementation (post 2020):

- Subbasin monitoring (annual expense)
- LandSAT data (annual expense)
- M&I groundwater well meters, installation, maintenance, and data collection (one time and ongoing)
- Analyzing and synthesizing data collected (ongoing)
- Annual and 5-year milestone reviews and reports (ongoing)
- Subbasin coordination (ongoing)
- GIS map and function development (initial and ongoing maintenance cost)
- Design and construction of projects

An estimate of the costs associated with each center are unknown at this time, and additional cost centers are likely to be identified as time goes on. However, it can be assumed that the costs will demand additional staff, consultants, or both, which will likely be beyond the current revenue stream of the District. Additional financial resources will be needed and must be identified within the GSP.

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Policy Points relative to intra-subbasin issues

Policy Point #7 - Transfer of groundwater within other GSAs or from one GSA to another GSA

Unmitigated local impacts at the area(s) where groundwater credits would be moved and extracted remain a concern. An example of this concern would be if significant credits are moved to areas having the greatest impact on subsidence of the FKC with those impacts not being accompanied with full, real-time, and ongoing mitigation. For this reason, the DEID GSA does not support unmitigated transfer of groundwater either within or across GSA boundaries. An acceptable groundwater transfer would one where the transferring GSA can demonstrate either no local impacts to another GSA or any impacts are fully mitigated.

Policy Point #8 - Transitional pumping within any GSA within the Tule Subbasin

Transitional pumping can be defined as the concept of allowing continued over-pumping of groundwater in the Tule Subbasin over some period of time following January 30, 2020, the date when GSAs are required to begin implementation of their respective Groundwater Sustainability Plans. Discussions within some GSAs in the Subbasin have proposed transition periods of 5, 10, 15, and as long as 20 years before reducing groundwater pumping to the calculated sustainable yield for the Subbasin. Similar to Policy Point #7 addressing transferability of groundwater, unmitigated local impacts at the area(s) where transitional pumping is extracted remains a concern. An example of this concern would be transitional pumping occurring in areas having the greatest impact on subsidence of the FKC with those impacts not being accompanied with full, real-time, and ongoing mitigation. Failing to address the local impacts of transitional pumping on the FKC would create significant and unreasonable undesirable results by reducing DEID's ability to deliver surface water to its growers. For this reason, the DEID GSA does not support unmitigated transitional pumping. An acceptable transitional pumping program would one where the GSA can demonstrate either no subsidence impacts on another GSA or any impacts are fully mitigated.

Policy Point #9 - Water measurement and metering

GSAs within the Tule Subbasin may select the use of well-head metering to meter gross groundwater extractions or employ remote sensing technology to measure crop use/net extraction of groundwater (LandSAT). For municipal, industrial or other water users with annual groundwater use greater than 2 acre-feet per year and where LandSAT technology is not applicable, well-head meters will be required. Standards for meters used, required maintenance and calibration, frequency and method of meter reading should be determined and coordinated by the Subbasin TAC consultant.

Policy Point #10 – Basin monitoring plan

As required by SGMA, a monitoring plan that addresses surface water monitoring, groundwater monitoring, along with land surface elevation and subsidence monitoring is required to be developed. Consistent with the recommendations of the Tule Subbasin hydrogeologist, the DEID GSA supports development, implementation, and ongoing collection of monitoring data at the subbasin level. While the DEID GSA does support individual GSAs developing further monitoring points in addition to those developed by the subbasin as a whole, it does not support individual GSAs collecting data from specific monitoring points that the GSA and Tule subbasin will rely upon in meeting its sustainability goals.

Objectivity, consistency in collection, and reliability of the data collected must be ensured and verified throughout the monitoring process.

Policy Point #11 – Savings Clause

The DEID GSA expects and welcomes the efforts that all GSAs within the Subbasin have made and will make to coordinate their respective GSPs as required by SGMA. However, we recognize the monumental task before the Subbasin to agree upon a coordinated set of sustainable management criteria. In the event that the Tule Subbasin’s GSPs remain uncoordinated on January 31, 2020, the DEID GSA BOD is prepared to submit its GSP to the Department of Water Resources and proceed with implementation of its uncoordinated GSP to the fullest extent that it can. The DEID GSA recognizes that lack of coordination within the Tule Subbasin will likely lead to the probationary status of some or all of the Tule Subbasin; however, given its current status of documented sustainability within the DEID management area, the DEID GSA BOD should be prepared to move forward in the above manner.