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## SECTION 7: Implementation Plan [§354.44(b)(6)]

### §354.44 Projects and Management Actions.

(b) Each Plan shall include a description of the projects and management actions that include the following:

(6) An explanation of how the project or management action will be accomplished. If the project or management actions rely on water from outside the jurisdiction of the Agency, an explanation of the source and reliability of that water shall be included.

### 7.1 Introduction

This section provides a conceptual roadmap for the Carpinteria Groundwater Sustainability Agency's (GSA's) efforts to implement this Groundwater Sustainability Plan (Plan) after adoption and discusses implementation efforts in accordance with Sustainable Groundwater Management Act (SGMA) regulations § 354.44(b)(6). This implementation plan is based on the Carpinteria GSA's current understanding of the Basin's conditions and anticipated administrative considerations that affect the management actions described in Section 6. Understanding of basin conditions and administrative considerations will evolve over time, based on future refinement of the hydrogeologic setting, groundwater flow conditions, and input from basin stakeholders.

Implementation of this Plan requires robust administrative and financing structures, with adequate staff and funding to support compliance with SGMA. The Plan calls for the Carpinteria GSA to routinely provide information to the public about Plan implementation, progress towards sustainability, and the need to use groundwater efficiently. The Plan calls for a website to be maintained as a communication tool for posting data, reports, and meeting information.

Section 6 identifies the following three tiers of projects and management actions that may be considered for implementation by the Carpinteria GSA:

- Tier 1 projects are expected to be implemented within the first 5-year SGMA implementation period.
- Tier 2 projects will be considered after the first 5-year period and prior to the 20-year implementation deadline.
- Tier 3 management actions will be evaluated individually after Plan adoption, and implemented as appropriate under the direction of the GSA.

These projects and management actions can be implemented as the conditions in the Basin dictate. It is important to note that the Tier 2 projects and some of the management actions described in Section 6 may not be necessary if the implementation of Tier 1 projects and management actions result in conditions within the Basin that are trending toward meeting the Carpinteria GSA sustainability goals and measurable objectives. However, the Carpinteria GSA may determine that the implementation of Tier 2 projects is desirable for reasons other than reaching sustainability within the Basin and may elect to implement selected initiatives at any time.

Based on the results of the analysis performed in conjunction with the development of this Plan, the Carpinteria GSA concludes that the sustainability goals described in this Plan, and required under the provisions of SGMA, can be achieved through the implementation, as needed, of the Tier 1 projects (see

Sections 6.3 through 6.5), and some combination of and management actions (see Sections 6.9 through 6.14). Therefore, the Carpinteria GSA does not plan at this time to implement any of the Tier 2 projects and/or to initiate the construction of any project infrastructure for the specific goal of achieving sustainability until such time as evidence indicates that the Tier 2 projects will be necessary for sustainable groundwater management. The six management actions described below will be evaluated for cost and efficacy early in the initial 5-year SGMA implementation period, and implemented as determined appropriate by the Carpinteria GSA:

- Administrative Approach and Implementation Timing (Section 7.2)
- Permitting of Wells (Section 7.3)
- Annual Reporting (Section 7.4)
- Five-Year Plan Evaluation and Update (Section 7.5)
- Management Action Implementation (Section 7.6)
- Carpinteria GSA Annual Budget Estimates (Section 7.7)
- Funding Sources (Section 7.8)

## **7.2 Administrative Approach and Implementation Timing**

The Carpinteria GSA will likely hire consultant(s), assign a member agency to conduct or manage the effort, and/or hire staff to implement the Plan. If consultants are hired, it is anticipated that qualified professionals will be identified and hired through a competitive selection process. It is also anticipated that the lead for a particular task will keep the Carpinteria GSA informed via periodic updates to the Carpinteria GSA Committee and the public. As needed, the Carpinteria GSA would likely conduct specific studies and analyses necessary to improve understanding of basin conditions. The Carpinteria GSA would likely then use new information on basin conditions to identify, evaluate, and/or improve management actions to achieve sustainability. This Plan calls for actions considered by the Carpinteria GSA to be vetted through a public outreach process, whereby groundwater pumpers and other stakeholders will have opportunities to provide input to the decision-making process.

Using authorities outlined in California Water Code §§ 10725 to 10726.9, the Carpinteria GSA will ensure the maximum degree of local control and flexibility consistent with this Plan to commence management actions. Because the amount of groundwater pumping in the Carpinteria area in recent years has been more than the estimated sustainable yield of approximately 3,600 to 4,000 acre-feet per year (see Section 3.3), and groundwater levels were observed to decline in some areas during the drought, the Carpinteria GSA will begin to implement selected projects and management actions within 1 year after Plan adoption. The Carpinteria GSA plans to continually monitor and assess its progress toward meeting the SMCs (see Section 5). Under conditions in which minimum thresholds are being approached, the Carpinteria GSA will perform assessments to determine whether the trends are related to groundwater pumping, drought conditions, or other factors. If groundwater level data are trending toward reaching minimum thresholds as a direct consequence of groundwater pumping in the Basin, then the Carpinteria GSA may consider the implementation of additional projects or management actions.

## **7.3 Permitting of Wells**

In accordance with Paragraph 9 of Governor Newsom’s Executive Order N-7-22 and the Santa Barbara County (County) Board of Supervisors Urgency Ordinance No. 5158 dated May 24, 2022 (Urgency Ordinance), the County Department of Environmental Health Services shall not approve a permit for a new

groundwater well or for alteration of an existing well in a medium- or high-priority basin subject to the SGMA without first obtaining written verification from the GSA that groundwater extraction by the proposed well:<sup>1</sup>

1. Would not be “inconsistent with any sustainable groundwater management program” established by the Plan adopted by that GSA, and
2. Would not decrease the likelihood of achieving a sustainability goal for the basin covered by the Plan.

Paragraph 9 of Executive Order N-7-22 does not apply to permits for wells that will provide less than 2 acre-feet per year of groundwater for individual domestic users, or that will exclusively provide groundwater to public water supply systems as defined in section 116275 of the Health and Safety Code.

At the time of the adoption of this Plan, the Governor’s Executive Order, though intended as a temporary response to the recent drought, remains in place. Discussions in the state legislature have proposed various alternatives for permanent legislation addressing similar subject matter, but none have been passed at this time. The practical effect of the executive order and the urgency ordinance is to authorize to the GSA to approve or deny any significant groundwater development in the Basin in compliance with the Plan.

SGMA focuses on sustainability of the basin but does not consider water rights. SGMA directly states that its intent is not to change or affect water rights. The GSA does not have the authority, nor should it be administering programs that prevent landowners from exercising their water rights. Because of this, the Plan will consider well verification letters required by the Executive Order in the context of how the new well will affect the GSA’s ability to implement future programs such as pumping curtailment for all or groundwater replenishment.

## 7.4 Annual Reporting

The Carpinteria GSA will submit an annual report to DWR by April 1 of each year following the adoption of the Plan. The annual report will include the following components for the preceding water year as required by DWR (California Code of Regulations [CCR] § 356.2):

- (a) *General information, including an executive summary and a location map depicting the basin covered by the report.*
- (b) *A detailed description and graphical representation of the following conditions of the basin managed in the Plan:*
  - (1) *Groundwater elevation data from monitoring wells identified in the monitoring network shall be analyzed and displayed as follows:*
    - (A) *Groundwater elevation contour maps for each principal aquifer in the basin illustrating, at a minimum, the seasonal high and seasonal low groundwater conditions.*
    - (B) *Hydrographs of groundwater elevations and water year type using historical data to the greatest extent available...*
  - (2) *Groundwater extraction for the preceding water year... and a map that illustrates the general location and volume of groundwater extractions.*
  - (3) *Surface water supply used or available for use...*
  - (4) *Total water use...*
  - (5) *Change in groundwater in storage...*

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<sup>1</sup> New wells are those resulting in new or additional groundwater production from the Basin, or those resulting in new or additional production capacity. Replacement wells are those not resulting in new or additional groundwater production or production capacity in the Basin.

(c) A description of progress towards implementing the Plan, including achieving interim milestones, and implementation of projects or management actions since the previous annual report.

## 7.5 Five-Year Evaluation and Update

The Carpinteria GSA will evaluate its Plan at least every 5 years, and whenever the Plan is evaluated a written assessment will be provided to DWR. The assessment will describe whether Plan implementation, including implementation of projects and management actions, are meeting the sustainability goal in the Basin, and will include the following:

3. A description of current groundwater conditions for each applicable sustainability indicator relative to measurable objectives, interim milestones, and minimum thresholds.
4. A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions.
5. 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, will be reconsidered and revisions proposed, if necessary.
6. 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 Carpinteria GSA's evaluation shows that the Basin is experiencing overdraft conditions, the Carpinteria GSA will include an assessment of measures to mitigate that overdraft.
7. 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 the SGMA regulations (23 CCR §§ 352.4 and 354.34(c)). The description will include the following:
  - a. 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 § 354.38.
  - b. If the Carpinteria GSA identifies data gaps, the Plan will 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.
  - c. The Plan will prioritize the installation of new data collection facilities and analysis of new data based on the needs of the Basin.
8. A description of significant new information that has been made available since Plan adoption or amendment, or the last 5-year assessment. The description will 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.
9. A description of relevant actions taken by the Carpinteria GSA, including a summary of regulations or ordinances related to the Plan.
10. Information describing any enforcement or legal actions taken by the Carpinteria GSA in furtherance of the sustainability goal for the Basin.
11. A description of completed or proposed Plan amendments.
12. Where appropriate, a summary of coordination that occurred between GSAs in hydrologically connected basins and local land use agencies.
13. Other information the Carpinteria GSA deems appropriate, along with any information required by DWR to conduct a periodic review as required by California Water Code § 10733 (CCR § 356.4).

## 7.6 Management Action Implementation

Details of the projects and management actions identified by the Carpinteria GSA for possible implementation are presented in Section 6. The Tier 1 projects will be initiated or completed within the initial 5-year SGMA implementation period. Funding for the Tier 1 CAPP and the Casitas Water District tie-in have been secured through state grants, low-interest loans, or other funding mechanisms; it is anticipated that funding for the Tier 1 project Sentinel Well Network Expansion will be pursued through grant and low interest loan funding as well.

The Tier 2 projects may be considered for implementation in the future as conditions in the Basin dictate and the effectiveness of the other management actions are assessed. Management actions discussed in Section 6 will be individually evaluated early in the initial 5-year SGMA implementation period, and implemented as considered appropriate by the GSA. It is important to note that the management actions and projects included in Tiers 2 and 3 management actions and Tier 3 projects may not be necessary if the implementation of Tier 1 management actions result in basin conditions that trend toward meeting the Carpinteria GSA sustainability goals and measurable objectives. However, the Carpinteria GSA may determine that the implementation of Tier 2 projects is desirable for reasons of basin management other than reaching sustainability within the Basin and may elect to implement such projects at any time. (As an example, installation of an ASR well may not be specifically required to meet SMCs, but would increase the ability to store water and thus improve the flexibility available in basin management. **Table 7-1** provides an estimate of the planning-level costs associated with the Tier 1 and Tier 2 projects. **Table 7-2** provides an estimate of planning-level costs associated with the management actions. The Carpinteria GSA will develop more specific planning-level costs for potential projects and management actions as they are implemented or identified for consideration by the Carpinteria GSA in the future.

**Table 7-1. Conceptual Planning-Level Cost Estimate for Potential Project Implementation**

Activity	Planning Level Estimate <sup>1</sup>	
	Low	High
<b>Tier 1 Projects (External Funding Sources)</b>		
Carpinteria Advanced Purification Project <sup>2</sup>	\$40 million	\$50 million
Sentinel Monitoring Well Network Expansion <sup>3</sup>	\$2 million	\$5 million
Casitas Water District Tie-In <sup>2</sup>	\$21 million	\$25 million
<b>Tier 2 Projects</b>		
Seawater Barrier Intrusion Project <sup>4</sup>	\$4 million	\$8 million
Aquifer Storage and Recovery Well <sup>4</sup>	\$2 million	\$4 million
Recharge Enhancement Projects <sup>4</sup>	\$500,000	\$30 million
<b>TOTAL</b>	<b>\$69.5 million</b>	<b>\$122 million</b>

**Notes**

<sup>1</sup> The estimates in this table are planning-level cost estimates that are subject to refinement and revision by the Carpinteria GSA after Plan adoption.

<sup>2</sup> External grant and low-interest loan funding already secured.

<sup>3</sup> External grant and low-interest funding will be pursued.

<sup>4</sup> Tier 2 Projects are not anticipated to be implemented during initial 5-year SGMA implementation period.

**Table 7-2. Conceptual Planning-Level Cost Estimate for Potential Management Action Implementation**

Activity	Planning Level Estimate <sup>1</sup>			
	Annual Cost	Event Cost	5-year Total	Average Annualized Cost (5 years)
<b>Management Actions (GSA Implementation Costs)</b>				
Municipal Pumping Re-Distribution	\$15,000	\$0	\$75,000	\$15,000
Local Water Banking Agreements with Neighboring Districts	\$20,000	\$0	\$100,000	\$20,000
Well Registration/Metering Program/Monitor Well Network Expansion	\$50,000	\$0	\$250,000	\$50,000
Water Conservation and Efficiency Programs	\$15,000	\$0	\$75,000	\$15,000
Groundwater Model Updates	\$0	\$150,000	\$150,000	\$30,000
Address Data Gaps	\$10,000	\$0	\$50,000	\$10,000
<b>Total Annual Cost to Implement Management Actions</b>	—	—	—	<b>\$140,000</b>

**Notes**

<sup>1</sup> The estimates in this table are planning-level cost estimates that are subject to refinement and revision by the Carpinteria GSA after Plan adoption.

— = not applicable



## 7.7 Annual Budget Estimates

The Carpinteria GSA will incur costs for internal management and operation of the Carpinteria GSA, including monitoring of the conditions in the Basin and Plan implementation. The conceptual estimated staff and administration costs of plan implementation are presented herein. Additional variable costs may include engineering and other consulting services, permits and fees, California Environmental Quality Act compliance, legal expenses, and other administrative costs associated with the implementation of the Tier 1 management actions, along with the potential for additional costs associated with the potential future implementation of the Tier 2 management actions and/or Tier 3 projects. Additionally, the Carpinteria GSA will incur costs associated with the preparation of required annual reports to DWR and the required 5-year Plan evaluation and, if necessary, updates to the Plan. **Table 7-3** provides an estimate of the conceptual planning-level costs for Carpinteria GSA annual management and operation.

**Table 7-3. Conceptual Planning-Level Cost Estimate for Carpinteria GSA Annual Management and Operation**

Activity	Planning Level Estimate <sup>1</sup>	
	Low	High
Carpinteria GSA Staffing	\$100,000	\$140,000
Consulting Services	\$10,000	\$30,000
Administrative Professional Services <sup>2</sup>	\$62,000	\$66,000
Basin Monitoring	\$20,000	\$22,000
Legal	\$21,000	\$22,000
Miscellaneous Expenses	\$10,000	\$15,000
Annual Reporting	\$40,000	\$50,000
Debt Service <sup>3</sup>	\$80,000	\$110,000
<b>TOTAL</b>	<b>\$353,000</b>	<b>\$455,000</b>

### Notes

<sup>1</sup> The estimates in this table are planning-level cost estimates that are subject to refinement and revision by the Carpinteria GSA after Groundwater Sustainability Plan adoption. Costs for some items are shared between the GSA and the Carpinteria Valley Water District.

<sup>2</sup> Includes services such as accounting, audits, insurance, and public outreach.

<sup>3</sup> Debt service indicates current payments on existing projects and management actions, GSA formation, etc.

Basin = Carpinteria Groundwater Basin

GSA = Groundwater Sustainability Agency

## 7.8 Funding Sources

Early in the initial 5-year SGMA implementation period, the Carpinteria GSA will develop and begin administration of a fee program for the purpose of funding the management actions required to implement the Plan and the day-to-day administrative costs of operating the GSA. It is anticipated that this program will be separate from any project-specific funding for capital projects. The fee program is likely to be based on groundwater pumping in the Basin; the precise method of determination of non-metered groundwater pumping is not yet established, but initial discussions have begun with basin agricultural stakeholders during the development of this Plan. The Carpinteria GSA may consider measures to fund Plan implementation using a combination of groundwater extraction charges, including monthly fixed charges and variable pumping fees, assessments/parcel taxes, parcel fees, and grants. Because of constitutional limitations imposed through California Propositions 13, 218, and 26, there are strict rules about what constitutes a fee, charge, assessment, or tax. The County Water Agency and grants from DWR have funded the majority of the Plan development costs to date, and it is expected that grants available from general obligation bonds, such as Proposition 68, may be available to help fund future Plan implementation.

On May 14, 2021, Governor Newsom rolled out his California Comeback Plan, marking unprecedented and notable one-time funding investments.<sup>2</sup> This came after a year of unprecedented moments from a global pandemic, record-breaking wildfires, and increased momentum to build equity across multiple segments of society. Of particular interest to the Carpinteria GSA is potential funding from Assembly Bill 350, a bill to create a 3-year grant program to assist farmers and ranchers in critically over-drafted basins with conservation management planning. As part of this measure, the Governor is proposing \$300 million in funds for implementation and planning of the SGMA.

After Plan adoption, the Carpinteria GSA may perform a preliminary financing plan options evaluation to determine a funding structure to fund the proposed Carpinteria GSA activities and expected financial commitments throughout Plan implementation. Development of the funding mechanism(s) is critical to facilitate successful implementation of the Plan consistent with the requirements of SGMA. A key success factor is preparing a cost allocation that is equitable to Carpinteria GSA members and stakeholders. After the evaluation of financing plan options, a preliminary financing model may be developed to determine revenue required to fund the operating plan, to establish reserve balances, and to evaluate required adjustments to the fee structure over time.

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<sup>2</sup> State of California. 2021. California Roars Back: Governor Newsom Presents \$100 Billion California Comeback Plan. Office of Governor Gavin Newsom. Available at <https://www.gov.ca.gov/2021/05/14/california-roars-back-governor-newsom-presents-100-billion-california-comeback-plan/>. May 14, 2021.