



AGENDA

REGULAR MEETING OF THE BOARD OF DIRECTORS OF CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY

CARPINTERIA CITY HALL
5775 CARPINTERIA AVENUE
CARPINTERIA, CA 93013

Wednesday, January 24, 2024 at 5:35 p.m.

Join Zoom Meeting

<https://us06web.zoom.us/j/89906790830?pwd=vLLdKTuhoD5nboucxFm2mqbriQ80Hn.1>

Meeting ID: 899 0679 0830

Passcode: 740319

or

Dial by Phone: 1-669-444-9171

1. CALL TO ORDER
2. PUBLIC FORUM (Any person may address the Board of Directors on any matter within its jurisdiction which is not on the agenda).
3. APPROVAL ITEMS
 - A. ****Minutes for the Meeting of the Board held on November 29, 2023**
 - B. ****Disbursement Report for November 16, 2023 – December 15, 2023**
 - C. ****Semi-Annual Vendor Payment Report**
4. UNFINISHED BUSINESS – none
5. NEW BUSINESS –
 - A. ****Consider Independent Auditor's Report and Financial Statements for FY 22-23 prepared by Bartlett Pringle & Wolf (for action, Treasurer, Norma Rosales).** *Presentation by Tracey Solomon, CPA, Bartlett Pringle & Wolf*
 - B. ****Present Proposed Groundwater Sustainability Plan with Public Comments (for information, Executive Director Bob McDonald).** *Presentation by Dave O'Rourke, GSI Water Solutions*
 - C. **Public Hearing on Proposed Groundwater Sustainability Plan (GSP)**
 1. Opening of Public Hearing (Chairman Van Wingerden)
 2. Receipt of Public Comment (Chairman Van Wingerden)
 3. Closing of Public Hearing (Chairman Van Wingerden)
 4. Director Comments

******Indicates attachment of document to agenda packet.

- D. **Consider Resolution No. 031 adopting a Groundwater Sustainability Plan for Carpinteria Groundwater Basin (for action, Executive Director Bob McDonald).**
- E. **Consider Engaging GSI Water Solutions for SGMA Annual Reporting in an amount not to exceed \$49,958 (for action, Executive Director Bob McDonald).**

6. EXECUTIVE DIRECTOR REPORTS (for information) – None

7. ADJOURNMENT

Robert McDonald, Secretary

The above matters are the only items scheduled to be considered at this meeting.

Note: The above Agenda was posted at Carpinteria Valley Water District Administrative Office in view of the public no later than 5:00 p.m., January 21, 2024. The Americans with Disabilities Act provides that no qualified individual with a disability shall be excluded from participation in, or denied benefits of, the District's programs, services, or activities because of any disability. If you need special assistance to participate in this meeting, please contact the District Office at (805) 684-2816. Notification at least twenty-four (24) hours prior to the meeting will enable the District to make appropriate arrangements. Materials related to an item on this Agenda submitted to the Board of Directors after distribution of the agenda packet are available for public inspection in the Carpinteria Valley Water district offices located at 1301 Santa Ynez Avenue, Carpinteria during normal business hours, from 8 am to 5 pm.

****Indicates attachment of document to agenda packet.**

	MINUTES OF THE REGULAR MEETING OF THE BOARD OF DIRECTORS OF CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY	
	November 29, 2023	
	Chairman Van Wingerden called the regular meeting of the Carpinteria Groundwater Sustainability Agency Board of Directors held in the Carpinteria City Hall Chamber to order at 5:33 p.m., Wednesday, November 29, 2023.	
	Directors Present; Johnson, Balch, Holcombe, Roberts and Van Wingerden	
	Director Absent: none	
	Others Present: Bob McDonald, Norma Rosales, Cari Ann Potts	
	David O'Rourke, Peter Lapidus, Scott Van Der Kar, Will Carlton	Alan Soicher, Caroline Frary, Jared Frary, Rob Morrow
PUBLIC FORUM	No one from the public addressed the Board.	
MINUTES	Following discussion, Director Johnson moved, and Director Balch seconded the motion to approve the minutes of the Board meeting held on November 8, 2023. The motion carried by a 4-0-1 vote with Director Holcombe abstaining. The minutes were approved by roll call as follows; Ayes: Johnson, Balch, Roberts and Van Wingerden Nays: None Absent: None Abstain: Holcombe	
GSPAC SUMMARY REPORT	Executive Director McDonald presented a Summary Report on GSPAC activities. Alan Soicher addressed the Board regarding GSP concerns and recommendations. Alan advocated prioritizing natural recharge projects as a means to reach Groundwater Sustainability. For information.	
GROUNDWATER SUSTAINABILITY PLAN	Executive Director McDonald presented to consider the Proposed Groundwater Sustainability Plan with Public Comments. Presentation with Public Comments by David O'Rourke, GSI. For Information.	

PUBLIC HEARING	Following the discussion of the Proposed Groundwater Sustainability Plan, Chairman Van Wingerden began the Public Hearing at 6:30 p.m. 1) Opening of Public Hearing by Chariman Van Wingerden at 6:30 p.m. 2) Receipt of public comment by Chairman Van Wingerden • Scott Van Der Kar, Caroline Frary, Jared Frary and Peter Lapidus addressed the Board. Executive Director McDonald gave a verbal response. 3) Closing of Public Hearing by Chairman Van Wingerden at 6:49 p.m. 4) Director Comments – Executive Director McDonald addressed comments from Directors
RESOLUTION NO. 030	Executive Director McDonald presented to consider Resolution No. 030 approving the Groundwater Sustainability Plan. <u>Resolution No. 030 Resolves to find:</u> 1) The GSP, in the form presented this day to the Board of Directors and subject to any final non-substantive edits that may be made at the Executive Director’s discretion prior to submittal to DWR, is hereby approved and adopted. 2) The Executive Director is authorized and directed to timely provide notification of this approval and adoption to DWR, including a copy of this Resolution, the approved GSP, and any additional information required by law. Following discussion, Director Holcombe moved, and Director Roberts seconded the motion to approve Resolution No. 030. The motion carried by a 5-0 vote. The motion was approved by roll call as follows; Ayes: Johnson, Balch, Holcombe, Roberts and Van Wingerden Nayes: None Absent: None
ADJOURNMENT	Chairman Van Wingerden adjourned the meeting at 7:08 p.m. Robert McDonald, Secretary



Monthly Disbursement Report
Carpinteria Groundwater Sustainability Agency

Payment Date: 11/16/23 - 12/15/23

CARPINTERIA GSA

Disbursement Report

Carpinteria Groundwater Sustainability Agency Account - Check Report

Vendor	Description	Payment Number	Payment Date	Payment
BELMONTE WEST LLC				1,668.00
	GSA FEE APPEAL REFUND	2070	11/21/2023	1,668.00
BONDY GROUNDWATER CONSULTING, INC				391.80
	GSP DEVELOPMENT - NOVEMBER	2079	12/12/2023	391.80
DAVID LELANDE				2,019.38
	GSA FEE APPEAL REFUND	2071	11/21/2023	2,019.38
ERROL L. MONTGOMERY & ASSOCIATES INC.				115.00
	GSP DEVELOPMENT - OCTOBER	2080	12/12/2023	115.00
GROUNDWATER SOLUTIONS, INC.				23,540.50
	GSP DEVELOPMENT - OCTOBER	2073	11/21/2023	23,540.50
KATZ & ASSOCIATES, INC.				2,430.00
	GSP DEVELOPMENT - SGMA OUTREACH - OCTOBER	2074	11/21/2023	2,220.00
	GSP DEVELOPMENT - SGMA OUTREACH - NOVEMBER	2081	12/12/2023	210.00
PACIFIC SURVEYS, LLC				2,161.25
	GSA - SENTRY WELL - NOVEMBER	2082	12/12/2023	2,161.25
PUEBLO WATER RESOURCES, INC				3,870.00
	GSA - GSP DEVELOPMENT - OCTOBER	2075	11/21/2023	3,870.00
RINCON DEL MAR RANCH LLC				1,903.56
	GSA FEE APPEAL REFUND	2072	11/21/2023	1,903.56
ROCKWELL PRINTING INC				753.74
	GSP PUBLIC DRAFTS	2076	12/5/2023	753.74
RUTAN & TUCKER, LLP				197.50
	LEGAL PROFESSIONAL SERVICES - NOVEMBER	2083	12/12/2023	197.50
SPENCER SEALE				170.30
	GSA SAMPLING - DROP OFF 100123-120923 REIMBURSE	2084	12/13/2023	170.30
UNITED STATES TREASURY				2,301.73
	FEDERAL TAXES - 2ND QRTR 2023	2078	12/6/2023	2,301.73
Total:				\$ 41,522.76



Semi-Annual Vendor Payment Report
July 1, 2023 - December 31, 2023
by Vendor Amount

CARPINTERIA GSA

Vendor	Amount
PACIFIC COAST WELL DRILLING, INC	608,188.50
GROUNDWATER SOLUTIONS, INC.	143,022.84
PUEBLO WATER RESOURCES, INC	87,112.50
KATZ & ASSOCIATES, INC.	25,875.58
FRUIT GROWERS LABORATORY, INC	21,734.00
ERROL L. MONTGOMERY & ASSOCIATES INC.	16,075.00
BONDY GROUNDWATER CONSULTING, INC	7,047.29
RAFTELIS	5,178.28
MYERS, WIDDERS, GIBSON JONES & FEINGOLD, LLP	4,361.00
PACIFIC SURVEYS, LLC	4,180.00
RUTAN & TUCKER, LLP	4,106.50
INFOSEND INC	2,954.07
UNITED STATES TREASURY	2,301.73
DAVID LELANDE	2,019.38
RINCON DEL MAR RANCH LLC	1,903.56
BELMONTE WEST LLC	1,668.00
US BANK	1,580.24
CITY OF CARPINTERIA	919.01
SCOTT VAN DER KAR	872.04
SOUTH COAST COMMUNITY MEDIA ACCESS CENTER	825.00
ROCKWELL PRINTING INC	753.74
CARPINTERIA LIONS COMMUNITY BUILDING ASSOCIATION	750.00
COASTAL VIEW NEWS	698.00
RAUCH COMMUNICATION CONSULTANTS, INC.	371.25
GARY LEE ATKINS	285.00
SPENCER SEALE	170.30
Report Total: \$	944,952.81



Semi-Annual Vendor Payment Report
July 1, 2023 - December 31, 2023
by Vendor Name

CARPINTERIA GSA

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US BANK	1,580.24
Report Total: \$	944,952.81

January 24, 2024

Board of Directors
Carpinteria Groundwater Sustainability Agency

To the Board of Directors:

We are pleased to present this letter related to our audit of the financial statements of Carpinteria Groundwater Sustainability Agency (the Agency) as of and for the year ended June 30, 2023. This letter is to inform the Board of Directors about significant matters related to the conduct of the annual audit so that it can appropriately discharge its oversight responsibility, and we can comply with professional standards.

Auditing standards generally accepted in the United States of America (AU-C 260, *The Auditor's Communication With Those Charged With Governance*) require the auditor to promote effective two-way communication between the auditor and those charged with governance. Consistent with this requirement, the following summarizes our responsibilities regarding the financial statement audit as well as observations arising from our audit that are significant and relevant to your responsibility to oversee the financial reporting process.

Our Responsibilities With Regard to the Financial Statement Audit

Our responsibilities under auditing standards generally accepted in the United States of America have been described to you in our arrangement letter dated August 3, 2023. Our audit of the basic financial statements does not relieve management or those charged with governance of their responsibilities, which are also described in that letter.

Overview of the Planned Scope and Timing of the Financial Statement Audit

We have issued a separate communication dated November 15, 2023 regarding the planned scope and timing of our audit and identified significant risks.

Significant Accounting Practices, Including Policies, Estimates and Disclosures

Preferability of Accounting Policies and Practices

Under generally accepted accounting principles, in certain circumstances, management may select among alternative accounting practices. In our view, in such circumstances, management has selected the preferable accounting practice.

Adoption of, or Change in, Accounting Policies

Management has the ultimate responsibility for the appropriateness of the accounting policies used by the Agency. The Agency did not adopt any significant new accounting policies nor have there been any changes in existing significant accounting policies during the current period.

Significant Accounting Policies

We did not identify any significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.

Significant Unusual Transactions

We did not identify any significant unusual transactions or significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.

Management's Judgments and Accounting Estimates

Accounting estimates are an integral part of the preparation of financial statements and are based upon management's current judgment. The process used by management encompasses their knowledge and experience about past and current events, and certain assumptions about future events. You may wish to monitor throughout the year the process used to determine and record these accounting estimates. The following summarizes the significant accounting estimates reflected in the Agency's June 30, 2022 financial statements.

Allocation of Personnel Costs

The Agency's personnel expense is based on an estimated percentage of time the Carpinteria Valley Water District staff will spend on the Agency's operations. Estimated allocations appear to represent a reasonable cost for services provided.

Basis of Accounting

The financial statements were prepared on the assumption that the Agency will continue as a going concern.

Audit Adjustments and Uncorrected Misstatements

Audit adjustments, other than those that are clearly trivial, proposed by us and recorded by the Agency are noted below.

The following adjustments were recorded after the initial trial balance was provided:

- \$2,954 to accrue administrative expenses for fiscal year ended June 30, 2023.
- \$367,870 to record grant receivable invoices for fiscal year ended June 30, 2023.

We are not aware of any uncorrected misstatements other than misstatements that are clearly trivial.

Observations About the Audit Process

Disagreements with Management

We encountered no disagreements with management over the application of significant accounting principles, the basis for management's judgments on any significant matters, the scope of the audit, or significant disclosures to be included in the financial statements.

Consultations with Other Accountants

We are not aware of any consultations management had with other accountants about accounting or auditing matters.

Significant Issues Discussed with Management

No significant issues arising from the audit were discussed with or the subject of correspondence with management.

Significant Difficulties Encountered in Performing the Audit

We did not encounter any difficulties in dealing with management during the audit.

Difficult or Contentious Matters That Required Consultation

We did not encounter any significant and difficult or contentious matters that required consultation outside the engagement team.

Shared Responsibilities: AICPA Independence

The American Institute of Certified Public Accountants (AICPA) regularly emphasizes that auditor independence is a joint responsibility and is managed most effectively when management, audit committees (or their equivalents), and audit firms work together in considering compliance with AICPA independence rules. For Bartlett, Pringle and Wolf, LLP (BPW) to fulfill its professional responsibility to maintain and monitor independence, management, the Board of Directors, and BPW each play an important role.

Our Responsibilities

- AICPA rules require independence both of mind and in appearance when providing audit and other attestation services. BPW is to ensure that the AICPA's General Requirements for performing non-attest services are adhered to and included in all letters of engagement.
- Maintain a system of quality management over compliance with independence rules and firm policies.

The Agency's Responsibilities

- Timely inform BPW, before the effective date of transactions or other business changes, of the following:
 - New affiliates, directors, or officers.
 - New beneficial owners of the Agency which have significant influence.
 - Change in corporate structure impacting affiliates such as add-on acquisitions or exits.
- Provide necessary affiliate information such as new or updated investment structure charts, as well as financial information required to perform materiality calculations needed for making affiliate determinations.
- Understand and conclude on the permissibility, prior to the Agency and its affiliates, officers, directors, or persons in a decision-making capacity, engaging in business relationships with BPW.
- Not entering into relationships resulting in close family members of BPW covered persons, temporarily or permanently acting as an officer, director, or person in an accounting or financial reporting oversight role at the Agency.

Internal Control Matters

We have separately communicated internal control matters identified during our audit of the financial statements in a separate letter dated January 24, 2024.

Certain Written Communications between Management and Our Firm

In conjunction with the audit of the financial statements, we have been provided a letter of certain representations from management dated January 24, 2024.

Conclusion

This letter is intended solely for the information and use of the Board of Directors and management and is not intended to be and should not be used by anyone other than these specified parties. It will be our pleasure to respond to any questions you have about this letter. We appreciate the opportunity to continue to be of service to Carpinteria Groundwater Sustainability Agency.

Very truly yours,

BARTLETT, PRINGLE & WOLF, LLP
Certified Public Accountants and Consultants

January 24, 2024

Board of Directors
Carpinteria Groundwater Sustainability Agency
1301 Santa Ynez Avenue
Carpinteria, CA 93013

To the Board of Directors:

In planning and performing our audit of the financial statements of Carpinteria Groundwater Sustainability Agency (the Agency) for the year ended June 30, 2023, in accordance with auditing standards generally accepted in the United States of America, we considered the Agency's internal control over financial reporting as a basis for designing our auditing procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Agency's internal control. Accordingly, we do not express an opinion on the effectiveness of the Agency's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Control Deficiency

Related Party Labor Allocation Approval

Original Comment

During the current year audit, we noted that the labor allocation percentages used in the determination of the related party payable were not formally approved and documented. While the labor allocation is discussed in detail during the budgetary process, we

recommend that the Agency include the labor allocation percentages to be used within the budget so they will be formally documented and approved by the Board of Directors.

Current Year Status

The Agency included in the fiscal year ending June 30, 2024 adopted budget, a labor allocation schedule that details positions, salaries and allocation percentages and amounts.

Conclusion

This communication is intended solely for the information and use of the Board of Directors, management, and others within the Agency, and is not intended to be and should not be used by anyone other than these specified parties. This letter does not affect our report dated January 24, 2024 on the financial statements of Carpinteria Groundwater Sustainability Agency.

Very truly yours,

BARTLETT, PRINGLE & WOLF, LLP
Certified Public Accountants and Consultants

DRAFT

**CARPINTERIA GROUNDWATER
SUSTAINABILITY AGENCY**
June 30, 2023 and 2022
FINANCIAL STATEMENTS



BARTLETT, PRINGLE & WOLF, LLP
CERTIFIED PUBLIC ACCOUNTANTS AND CONSULTANTS

**CARPINTERIA GROUNDWATER
SUSTAINABILITY AGENCY**

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INDEPENDENT AUDITOR'S REPORT

**To the Board of Directors
Carpinteria Groundwater Sustainability Agency:**

Opinion

We have audited the accompanying financial statements of the Carpinteria Groundwater Sustainability Agency (the Agency) as of and for the years ended June 30, 2023 and 2022, and the related notes to the financial statements, which collectively comprise the Carpinteria Groundwater Sustainability Agency's basic financial statements as listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Carpinteria Groundwater Sustainability Agency as of June 30, 2023 and 2022, and the changes in financial position and cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audits in accordance with auditing standards generally accepted in the United States of America (GAAS). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Agency, and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Agency's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Agency's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Agency's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the Management's Discussion and Analysis on pages 4 through 8, be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational,

economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Santa Barbara, California
January 24, 2024

Management's discussion and analysis of the Agency's financial performance provides an overview of the Agency's financial activities for the years ended June 30, 2023 and 2022. Please read it in conjunction with the Agency's financial statements, which follow this section.

FINANCIAL STATEMENTS

This discussion and analysis provides an introduction and a brief description of the Agency's financial statements, including the relationship of the statements to each other and the significant differences in the information they provide. The Agency's financial statements include four components:

- Statement of Net Position
- Statement of Revenues, Expenses and Changes in Net Position
- Statement of Cash Flows
- Notes to the Financial Statements

The statement of net position includes all the Agency's assets and deferred outflows, and liabilities and deferred inflows, with the difference between the two reported as net position. Net position may be displayed in the categories:

- Net Investment in Capital Assets
- Restricted
- Unrestricted

The statement of net position provides the basis for computing rate of return, evaluating the capital structure of the Agency and assessing the liquidity and financial flexibility of the Agency.

The statement of revenues, expenses and changes in net position presents information which shows how the Agency's net position changed during the year. All of the current year's revenues and expenses are recorded when the underlying transaction occurs, regardless of the timing of the related cash flows. The statement of revenues, expenses and changes in net position measures the success of the Agency's operations over the past year and determines whether the Agency has recovered its costs through user fees and other charges.

The statement of cash flows provides information regarding the Agency's cash receipts and cash disbursements during the year. This statement reports cash activity in four categories:

- Operations
- Noncapital financing
- Capital and related financing
- Investing

This statement differs from the statement of revenues, expenses and changes in net position because the statement accounts only for transactions that result in cash receipts or cash disbursements.

The notes to the financial statements provide a description of the accounting policies used to prepare the financial statements and present material disclosures required by generally accepted accounting principles that are not otherwise present in the financial statements.

**CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY
MANAGEMENT'S DISCUSSION AND ANALYSIS**

DRAFT

FINANCIAL HIGHLIGHTS

- The financial statements for the year ending June 30, 2023, represent the third year of Agency operations. FY23 marks the first year that the Agency generated operating revenues via parcel acreage-based fee assessments, contributing to an overall improvement in its fiscal position.
- The financial statements for the year ending June 30, 2022, represented the second year of Agency operations. As of June 30, 2022, the Agency had not begun collecting member dues to offset Agency expenses and therefore had a negative net position. The negative net position of \$341,075 is unrestricted and was used to pay for the Agency's operating expenses.

Adopted Financial Accounting Standards

During the years ended June 30, 2023 and 2022, no new accounting standards had a significant impact to the Agency.

FINANCIAL POSITION

The Agency's overall fiscal position is improving due to the implementation of property acreage-based fee assessments in FY23. The Agency has a negative net position of \$215,432 as of June 30, 2023. The negative fund balance will be eliminated by budgeted assessment fees exceeding budgeted operating expense in fiscal years 2024 – 2026.

Condensed Statement of Net Position – *Analysis:*

	June 30, 2023	June 30, 2022	June 30, 2021	% Change FYE 2023 and 2022	% Change FYE 2022 and 2021
Assets:					
Current and other assets	\$ 404,095	\$ 75,044	\$ 143,379	438%	-48%
Total assets	404,095	75,044	143,379	438%	-48%
Liabilities:					
Current liabilities	219,938	144,462	3,230	52%	4373%
Long-term liabilities	399,588	271,657	320,609	47%	-15%
Total liabilities	619,526	416,119	323,839	49%	28%
Net position:					
Unrestricted	(215,431)	(341,075)	(180,460)	37%	-89%
Total net position	<u>\$ (215,431)</u>	<u>\$ (341,075)</u>	<u>\$ (180,460)</u>	<u>37%</u>	<u>-89%</u>

**CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY
MANAGEMENT'S DISCUSSION AND ANALYSIS**

DRAFT

Analysis of Changes in Total Net Position June 30, 2022, to June 30, 2023:

For the twelve months ended June 20, 2023, the Agency's total net position increased by \$125,644 or 37%, over the prior year, primarily to implementation of parcel acreage-based fee assessments. Unrestricted net position, the amount which may be used to meet the Agency's ongoing obligations, accounts for 100% of the net position.

Long-Term Liabilities

At the end of the current fiscal year, the Agency had long term liabilities of \$399,588, comprised of operating funds lent by a related party, Carpinteria Valley Water District. See Note 4 for additional detailed information about the Agency's long-term liability.

Analysis of Changes in Total Net Position June 30, 2021, to June 30, 2022:

For the twelve months ended June 20, 2022, the Agency's total net position decreased by \$160,615 or 89% over the prior year. Unrestricted net position, the amount which may be used to meet the Agency's ongoing obligations, accounted for 100% of the net position.

Long-Term Liabilities

At the end of the fiscal year ending June 30, 2022, the Agency had long term liabilities of \$271,657, comprised of operating funds lent by a related party, Carpinteria Valley Water District. See Note 4 for additional detailed information about the Agency's long-term liability.

Condensed Statement of Revenues, Expenses, and Changes in Net Position – Analysis:

	June 30, 2023	June 30, 2022	June 30, 2021	% Change FYE 2023 and 2022	% Change FYE 2022 and 2021
Operating revenues	\$ 956,204	\$ -	\$ -	100%	-
Operating expenses	819,146	150,474	173,855	444%	-13%
Operating income (loss)	137,058	(150,474)	(173,855)	-191%	-13%
Interest and investment income	17	-	-	100%	-
Interest expense	(11,431)	(10,141)	(6,605)	13%	54%
Net non-operating expenses	(11,414)	(10,141)	(6,605)	13%	54%
Change in net position	125,644	(160,615)	(180,460)	-178%	-11%
Net position, beginning of year	(341,075)	(180,460)	-	-89%	-100%
Net position, end of year	<u>\$ (215,431)</u>	<u>\$ (341,075)</u>	<u>\$ (180,460)</u>	<u>37%</u>	<u>89%</u>

**CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY
MANAGEMENT'S DISCUSSION AND ANALYSIS**

DRAFT

Condensed Statement of Revenues, Expenses, and Changes in Net Position – *Analysis:*

OPERATING REVENUES

	FY 20/21	FY 21/22	FY 22/23
<u>Operating Revenues</u>			
Assessments Revenue	\$ -	\$ -	\$ 320,022
Grant Revenue	-	-	636,182
Total Operating Revenues	\$ -	\$ -	\$ 956,204

Analysis of Changes in Operating Revenues from June 30, 2022, to June 30, 2023:

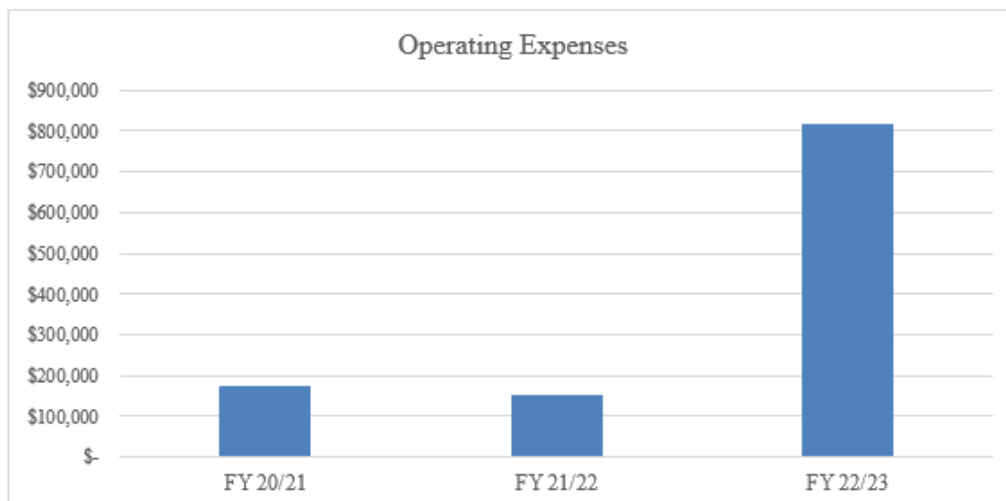
Operating revenues increased by \$956,203 over the prior fiscal year, which reported \$0 operating revenues. \$320,022 of the increase is due to the implementation of parcel acreage-based fee assessments, while \$636,181 of the increase is due to Proposition 68 grant proceeds.

Analysis of Changes in Operating Revenues from June 30, 2021, to June 30, 2022:

As of June 30, 2022, the Agency had not begun collecting fees and therefore reported no revenue for fiscal years 2022 and 2021.

OPERATING EXPENSES

	FY 20/21	FY 21/22	FY 22/23
Testing and Reporting	\$ 14,584	\$ 10,807	\$ 20,839
Groundwater Operations	68,343	10,288	568,543
General and Administrative	90,928	129,379	229,764
Total Operating Expenses	\$ 173,855	\$ 150,474	\$ 819,146



**CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY
MANAGEMENT'S DISCUSSION AND ANALYSIS**

DRAFT

Analysis of Changes in Operating Expenses from June 30, 2022, to June 30, 2023:

- Overall expenses increased by \$668,672 or 444%.
- Groundwater operations expense increased by \$558,254 or 5,426% primarily due to an increase in groundwater professional services related to Proposition 68 grant deliverables. Grant-related expenditures are almost entirely offset by grant revenue.
- General and administrative expenses increased by \$100,385 or 78% primarily due an increase in personnel allocations from a related party of \$85,453, or 219%, arising from full implementation of cost allocation in the current year, and to an increase in legal professional services of \$25,175 or 356%, partially offset by a decrease in administrative professional services of \$37,415 or 49% due to completion of a fee study in FY22.

Analysis of Changes in Operating Expenses from June 30, 2021, to June 30, 2022:

- Overall expenses decreased by \$23,381 or 13%.
- Groundwater operations decreased by \$58,054 or 85% primarily due to a decrease in groundwater professional services of \$58,556.
- General and administrative expenses increased by \$38,451 or 42%, primarily due to an increase in administrative professional services of \$61,488 arising from a fee study, partially offset by a decrease in personnel expense of \$33,471, due to timing of the recognition of personnel allocations from a related party in fiscal year 2020/21.

Analysis of Changes in Non-Operating Income and Expenses from June 30, 2022, to June 30, 2023:

For the year ended June 30, 2023, non-operating expenses consisted solely of interest accrued on long-term liabilities in the amount of \$11,431, an increase of \$1,290 or 13%, arising from an increase in loans provided by a related party to fund ongoing operations.

Analysis of Changes in Non-Operating Income and Expenses from June 30, 2021, to June 30, 2022:

For the year ended June 30, 2022, non-operating expenses consisted solely of interest accrued on long-term liabilities in the amount of \$10,142, an increase of \$3,537 or 53.6%, arising from an increase in loans provided by a related party to fund ongoing operations.

CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY

DRAFT**STATEMENT OF NET POSITION****For the Years Ended June 30, 2023 and 2022**

	2023	2022
ASSETS:		
Current assets:		
Cash in bank	\$ 36,225	\$ 75,044
Grant receivable	367,870	-
Total current assets	404,095	75,044
Total assets	404,095	75,044
LIABILITIES:		
Current liabilities:		
Accounts payable	77,270	39,455
Current portion of related party payable	142,668	105,007
Total current liabilities	219,938	144,462
Long-term liabilities:		
Related party payable	371,411	254,911
Interest payable on related party payable	28,177	16,746
Total long-term liabilities	399,588	271,657
Total liabilities	619,526	416,119
NET POSITION:		
Unrestricted	(215,431)	(341,075)
Total net position	\$ (215,431)	\$ (341,075)

See accompanying notes

CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY
STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION
For the Years Ended June 30, 2023 and 2022

DRAFT

	2023	2022
Operating revenues:		
Assessment revenue	\$ 320,022	\$ -
Grant revenue	636,182	-
Total operating revenues	<u>956,204</u>	<u>-</u>
Operating expenses:		
Water quality testing and reporting	20,839	10,807
Groundwater operations	568,543	10,288
General and administrative	229,764	129,379
Total operating expenses	<u>819,146</u>	<u>150,474</u>
Operating income (loss)	<u>137,058</u>	<u>(150,474)</u>
Non-operating income (expenses)		
Interest income	17	-
Interest expense	(11,431)	(10,141)
Net non-operating expenses	<u>(11,414)</u>	<u>(10,141)</u>
Change in net position	125,644	(160,615)
Net position, beginning of year	<u>(341,075)</u>	<u>(180,460)</u>
Net position, end of year	<u><u>\$ (215,431)</u></u>	<u><u>\$ (341,075)</u></u>

See accompanying notes

CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY

DRAFT**STATEMENT OF CASH FLOWS****For the Years Ended June 30, 2023 and 2022**

	2023	2022
Cash Flows from Operating Activities:		
Cash received from property assessments	\$ 320,039	\$ -
Cash received from grants	268,312	-
Payments to vendors and contractors	(781,331)	(114,249)
Net cash and cash equivalents used by operating activities	(192,980)	(114,249)
Cash Flows from Noncapital Financing Activities:		
Proceeds received from related party payable	154,161	45,914
Net cash and cash equivalents provided by noncapital financing activities	154,161	45,914
Decrease in cash and cash equivalents	(38,819)	(68,335)
Cash and cash equivalents, beginning of year	75,044	143,379
Cash and cash equivalents, end of year	<u>\$ 36,225</u>	<u>\$ 75,044</u>
Reconciliation of Change in Net Position to Net Cash Used by Operating Activities:		
Change in net position	\$ 125,644	\$ (160,615)
Adjustments to reconcile change in net position to net cash used by operating activities:		
Increase (decrease) in:		
Grant receivable	(367,870)	-
Accounts payable	37,815	36,225
Interest payable on related party payable	11,431	10,141
Net cash and cash equivalents used by operating activities	<u>\$ (192,980)</u>	<u>\$ (114,249)</u>

See accompanying notes

Note 1 – Reporting Entity and Summary of Significant Accounting Policies**A) Reporting Entity**

The Carpinteria Groundwater Sustainability Agency was formed to develop and implement a groundwater sustainability plan (GSP) for the Carpinteria Basin as mandated by the 2014 Sustainable Groundwater Management Act (SGMA). The Agency derives its powers and authorities from SGMA and its four Member Agencies. The Agency was formed through a joint powers agreement (JPA) in January 2020 by the Carpinteria Valley Water District, City of Carpinteria, Santa Barbara County Water Agency, and County of Ventura. It is governed by a five-member Board of Directors, consisting of directors from Carpinteria Valley Water District.

The Carpinteria Groundwater Sustainability Agency (the Agency) reporting entity includes all significant operations and revenue sources of which the Agency's Board of Directors exercises oversight responsibility and is determined under the criteria established by the National Council on Governmental Accounting Statement No. 3, as adopted by GASB. Oversight responsibility is determined on the basis of selection of the governing board, designation of management, ability to significantly influence operations, accountability for fiscal matters, and the scope of public service.

B) Basis of Accounting and Measurement Focus

The Agency is accounted for as an enterprise fund in accordance with generally accepted accounting principles (GAAP) as applied to governmental units. Enterprise funds are used to account for operations (a) that are financed and operated in a manner similar to private business enterprises, where the expenses, including depreciation, of providing goods or services to the general public are recovered through user charges, or (b) where the governing body has decided that periodic determination of revenues earned, expenses incurred, and net income is appropriate for capital maintenance, public policy, management control, and other purposes. Because the Agency is accounted for as an enterprise fund, the accrual method of accounting is used for financial statement reporting purposes. Revenues are recognized when they are earned, and expenses are recognized when they are incurred.

An enterprise fund is accounted for on a cost of services or "flow of economic resources" measurement focus. This means that all assets and liabilities, whether current or long-term, are included in the statement of net position.

The Agency distinguishes operating revenues and expenses from non-operating items. Operating revenues and expenses generally result from providing services and the producing and delivering of goods in connection with the Agency's principal ongoing operations. Operating revenues of the Agency consists of property assessments and groundwater extraction fees from its four-member agencies. Operating expenses of the Agency include program expenses, professional fees, general and administrative, and legal fees.

NOTES TO THE FINANCIAL STATEMENTS

Note 1 – Reporting Entity and Summary of Significant Accounting Policies (Continued)

B) Basis of Accounting and Measurement Focus (Continued)

The financial statements of the Agency have been prepared in conformity with accounting principles generally accepted in the United States of America (GAAP). The Governmental Accounting Standards Board (GASB) is the accepted standard setting body for establishing governmental accounting and financial reporting principles.

C) Budget

The Agency is required to adopt an annual budget. The budget is presented on the basis of the funding sources available as well as estimated expenditures for the upcoming fiscal year. The annual budget is approved by the Board of Directors in June each year. Once a budget is approved, it can be amended by the Board of Directors.

D) Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities, disclosure of contingent assets and liabilities, and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

E) Cash and Cash Equivalents

For purposes of the statement of cash flows, cash and cash equivalents include cash on hand and funds on deposit with financial institutions available for current use with an initial maturity of three months or less. All deposits are carried at cost plus accrued interest.

F) Net Position

Net position represents the difference between assets and liabilities and is classified into three components as follows:

Net investment in capital assets consists of capital assets, net of accumulated depreciation, reduced by the outstanding balances of any borrowings used for the acquisition, construction or improvement of those assets. Net investment in capital assets excludes unspent debt proceeds. The Agency does not have any net investment in capital assets.

Restricted net position consists of assets which are legally restricted by outside parties for use for a specific purpose. The Agency does not have any restricted assets.

Unrestricted net position consists of net position that does not meet the definition of “restricted” or “net investment in capital assets.”

When an expense is incurred for purposes for which both unrestricted and restricted resources are available for use, it is the Agency's policy to apply restricted assets first, then unrestricted resources.

NOTES TO THE FINANCIAL STATEMENTS

Note 1 – Reporting Entity and Summary of Significant Accounting Policies (Continued)**G) Property Assessments**

Funding for the operations of the Agency is through property assessments. The Agency levies assessments on a parcel-acreage basis on parcels located within the Carpinteria Groundwater Basin boundary. The Carpinteria Groundwater Basin is located within the boundaries of the County of Santa Barbara and the County of Ventura. The County of Santa Barbara accounts for the majority the assessments revenue.

H) Grant Receivable and Revenue

The Agency recognizes grant revenue when the qualifying expenditures are incurred, all eligibility requirements have been met, and collection of the grant funds is probable. Receipt of funds under the grant is dependent on the approval of submitted expenditures to the Department of Water Resources.

The State withholds 10% of the funds requested by the Agency for reimbursement until the project is completed and the final project completion report is approved.

For the years ended June 30, 2023 and 2022, grant receivable was \$367,870 and \$0, respectively.

I) Future GASB Accounting Pronouncements

The Governmental Accounting Standards Board Statements listed below will be implemented in future financial statements. These statements will be evaluated by the Agency to determine if they will have a material impact to the financial statements once effective.

Statement No. 100 *"Accounting Changes and Error Corrections - an amendment of GASB Statement No. 62"*

The requirements of this statement are effective for periods beginning after June 15, 2023. (FY 23/24)

Statement No. 101 *"Compensated Absences"*

The requirements of this statement are effective for periods beginning after December 15, 2023. (FY 24/25)

Note 2 – Cash and Cash Equivalents

The Agency's cash and cash equivalents consisted of bank deposits in the amount of \$36,225 and \$75,044 at June 30, 2023 and 2022, respectively.

Authorized Deposits and Investments

The Agency may invest assets in accordance with California Government Code Section 53600. The Agency has no investment policy and the Board of Directors has only approved the use of bank deposits.

NOTES TO THE FINANCIAL STATEMENTS

Note 2 – Cash and Cash Equivalents (Continued)**Interest Rate Risk**

Interest rate risk is the risk that changes in market interest rates will adversely affect the fair value of an investment. Generally, the longer the maturity of an investment, the greater the sensitivity of its fair value to changes in market interest rates. The Agency had no investments at year-end.

Credit Risk

Generally, credit risk is the risk that an issuer of an investment will not fulfill its obligation to the holder of the investment. This is measured by the assignment of a rating by a nationally recognized statistical rating organization. The Agency had no investments at year-end.

Custodial Credit Risk for Deposits

Custodial credit risk for *deposits* is the risk that, in the event of the failure of a depository financial institution, a government will not be able to recover its deposits or will not be able to recover collateral securities that are in the possession of an outside party. The custodial credit risk for *investments* is the risk that, in the event of the failure of the counterparty (e.g., brokerdealer) to a transaction, a government will not be able to recover the value of this investment or collateral securities that are in the possession of another party. The California Government Code and the Agency's investment policy do not contain legal or policy requirements that would limit the exposure to custodial credit risk for deposits, other than the following provision for deposits: the California Government Code requires that a financial institution secure deposits made by state or local governmental units by pledging securities in an undivided collateral pool held by a depository regulated under state law (unless so waived by the governmental unit). The market value of the pledged securities in the collateral pool must equal at least 110% of the total amount deposited by the public agencies. California law also allows financial institutions to secure public agency deposits by pledging first trust deed mortgage notes having a value of 150% of the secured public deposits. At June 30, 2023 and 2022, the carrying amount of the Agency's deposits and balance in the financial institution was \$36,225 and \$75,044, respectively, all of which was covered by federal depository insurance.

Note 3 – Commitments and Contingencies

Legal proceedings may arise from the normal conduct of business, but in the opinion of management and legal counsel, these matters will not have a materially adverse effect on the financial position or results of operations of the Agency.

The Agency entered into an agreement with Bondy Groundwater Consulting, Inc. on June 22, 2022 in the amount of \$60,000 for technical support associated with the GSP. As of June 30, 2023, costs in the amount of \$20,539 have been incurred in relation to this agreement.

NOTES TO THE FINANCIAL STATEMENTS

Note 3 – Commitments and Contingencies (Continued)

The Agency entered into an agreement with GSI Water Solutions, Inc. on June 22, 2022 in the amount of \$421,800 for services provided in developing a GSP. As of June 30, 2023, costs in the amount of \$231,467 have been incurred in relation to this agreement.

The Agency entered into an agreement with Pueblo Water Resources on June 22, 2022 in the amount of \$256,098 for hydrogeologic services associated with the development of the GSP. As of June 30, 2023, costs in the amount of \$153,166 have been incurred in relation to this agreement.

The Agency entered into an agreement with Pacific Coast Well Drilling on June 6, 2023 in the amount of \$739,310 for El Carro Park groundwater monitoring wells. As of June 30, 2023, no costs have been incurred in relation to this agreement.

Note 4 – Related Party Transactions

On May 6, 2020, Carpinteria Valley Water District, entered into a Grant Agreement on behalf of the Agency with the Department of Water Resources under the Infrastructure Improvement Act of 2014 (Proposition 1) to assist in the Sustainable Groundwater Planning of the GSA. As of July 1, 2022, the Agency began recognizing Proposition 1 grant revenue. Proposition 1 grant revenue was \$636,182 for the year ended June 30, 2023. Prior to July 1, 2022, \$415,558 of Proposition 1 grant revenue was recognized as revenue by a related party, Carpinteria Valley Water District. Total Proposition 1 grant revenue recognized by both entities through June 30, 2023, is \$1,051,740.

Upon the formation and initial operation of the Agency, Carpinteria Valley Water District agreed to advance funds to the Agency in the amount of \$164,340 to pay for certain administrative and program costs. Carpinteria Valley Water District also paid certain formation and operating expenses on behalf of the Agency in the amount of \$149,664. As of June 30, 2023 and 2022, the total outstanding related party note payable was \$514,079 and 359,918, respectively. Interest will accrue at a rate of 3%. Payments started during the fiscal year ending June 30, 2023.

The expected annual repayments of the related party payable are as follows:

Fiscal Year End	Principal	Interest	Total
2024	\$ 142,668	\$ 48,984	\$ 191,652
2025	182,920	11,311	194,231
2026	188,491	5,740	194,231
2027	-	-	-
2028	-	-	-
	<u>\$ 514,079</u>	<u>\$ 66,035</u>	<u>\$ 580,114</u>

NOTES TO THE FINANCIAL STATEMENTS

Note 5 – Subsequent Events

Management has evaluated subsequent events through January 24, 2024, the date which the financial statements were available to be issued.

Subsequent to year end, the Agency received loans totaling approximately \$840,000 from Carpinteria Valley Water District, in addition to those disclosed in Note 4. \$100,000 of the loans received from Carpinteria Valley Water District since June 30, 2023, are expected to be repaid within three years. \$740,000 of the loans received from Carpinteria Valley Water District are expected to be repaid from Proposition 1 grant proceeds. The invoice to claim the grant proceeds was submitted to the California Department of Water Resources on December 31, 2023.



To: CGSA Board of Directors

From: Bob McDonald, Executive Director

Date: January 24, 2024

For Consideration: Item 5.B Proposed Groundwater Sustainability Plan with Public Comments

Background

The California Legislature passed a statewide framework for sustainable groundwater management, known as the Sustainable Groundwater Management Act which was approved by the Governor and Chaptered by the Secretary of State on September 16, 2014. The Sustainable Groundwater Management Act (SGMA) went into effect on January 1, 2015.

SGMA requires all high- and medium-priority groundwater basins, as designated by the California Department of Water Resources (DWR) Bulletin 118, to be managed by a groundwater sustainability agency (GSA). The Carpinteria Groundwater Basin has been designated by DWR as a high-priority basin (DWR Bulletin 118 Groundwater Basin: 3-018). In response The Carpinteria Valley Water District, City of Carpinteria, Santa Barbara County Water Agency, and the County of Ventura formed a Joint Powers Authority which then elected on February 10, 2020 to become a GSA for the basin. The Carpinteria Groundwater Sustainability Agency was designated by DWR to be the Exclusive GSA for the Carpinteria Groundwater Basin on May 10 2020.

Analysis

The CGSA prepared a GSP for its boundaries in accordance with Water Code section 10727.2 to include all the components required by SGMA. CGSA Staff gave notice on October, 24 2023 to affected cities and counties regarding its intent to adopt a GSP and published public notices in the Coastal View on October 5th, 12th & 26th of 2023 soliciting comments on the draft GSP. Carpinteria Groundwater Sustainability Agency also gave notice on October 5th, 12th & 26th and November 16th & 22nd of 2023 to the public its intent to adopt a GSP on Nov 29th 2023. Carpinteria Groundwater Sustainability Agency held public meetings to review the draft GSP with the GSA Board of Directors on October 25th and November 8th of 2023.

The draft GSP was made available for review on the GSA website and for public comment October 6th, 2023 for 30 days. A number of parties reviewed and commented. The technical teams has reviewed and responded to all the comments. Some changes were made to the draft GSP in response to the comments. A version of the final draft of the GSP can be found on the GSA website at www.Carpgsa.org

Table 1 attached to this staff report shows all received public comments and GSA responses.

After the Public hearing held on November 29th the GSA board will be asked to adopt the GSP by resolution. If passe the executive director will submit the GSP and other pertinent material to DWR for review.

Recommendation

This item requires no action and is for information only.

Carpinteria Groundwater Basin Groundwater Sustainability Plan Comments and Responses

Commenter	Section	Page/ Figure/ Table	Comment	Response
Dan Wilson (NOAA’s NMFS)	General Comment	NA	NOAA’s National Marine Fisheries Service (NMFS) is the federal agency responsible for managing, conserving, and protecting living marine resources in inland, coastal, and offshore waters of the United States. We derive our mandates from numerous statutes, including the Federal Endangered Species Act (ESA). The purpose of the ESA is to conserve threatened and endangered species and their ecosystems. On October 6, 2023, the Carpinteria Basin Groundwater Sustainability Agency (hereafter, “GSA”) released their draft Groundwater Sustainability Plan (draft GSP) for public review and comment (Carpinteria Groundwater Sustainability Agency 2023). The Carpinteria Creek and Rincon Creek watersheds, which fall within the boundary of the draft GSP, support federally endangered southern California (SC) steelhead (<i>Oncorhynchus mykiss</i>). Carpinteria Creek and Rincon Creek also contain SC steelhead designated critical habitat (Federal Register 2005), and Intrinsic Potential Habitat (Boughton and Goslin 2006) for the species (see enclosure), and are identified in NMFS’ Southern California Steelhead Recovery Plan as high priority Core 1 recovery populations/watersheds (Federal Register 2005; NMFS 2012). (Arroyo Paredon has also been documented as supporting <i>O. mykiss</i>, and is identified as a Core 3 population/watershed in NMFS’ Southern California Steelhead Recovery Plan [NMFS 2012, Table 2-1, p. 2-7, Table 7-1, p. 7-5]). NMFS (2012) identified groundwater extraction in both the Carpinteria Creek and Rincon Creek watersheds as a “Very High Threat” to the steelhead populations in these watersheds (NMFS 2012, Table 10-2, p. 10-10). To address this threat, NMFS (2012) identified two recovery actions for these watersheds: 1) conduct groundwater extraction analysis and assessment; and 2) develop and implement a groundwater monitoring and management program (NMFS 2012, Table 10-12, p. 10-44 – 10-45, Table 10-13, p. 10-49). NMFS’ 2023 “Five-Year Review: Summary and Evaluation of Southern California Steelhead” identified groundwater extraction from Carpinteria Creek and Rincon Creek as a threat to these two steelhead populations (NMFS 2023, pp. 61, 65). NMFS 5-Year Review also specifically noted: “Significantly, the passage of the Sustainable Groundwater Management Act (SGMA) has provided a new regulatory mechanism for managing groundwater resources that have been identified as a major issue in the restoration of core recovery populations within the Southern California Steelhead DPS.” (NMFS 2023, p. 115) Surface water and groundwater appear to be hydraulically linked in the Carpinteria groundwater basin, which includes Carpinteria Creek and Rincon Creek, and this linkage is critically important in creating seasonal habitat for steelhead. Where groundwater supplements streamflow, the influx of cold, clean water is critically important for maintaining water quality (e.g., temperature and dissolved oxygen) and flow volume. Pumping water from this aquifer- stream complex has the potential to affect endangered steelhead and its habitat by diminishing groundwater accretion to creeks overlying the Carpinteria groundwater basin, or accelerating surface water loss from these creeks. NMFS is concerned that groundwater extraction in the Carpinteria groundwater basin may be currently impacting steelhead instream habitat in this way.	The GSA thanks NMFS for their comments. We are aware of the historical presence of steelhead trout and other sensitive species in the basin creeks, and have added text to section 3.2.7 to reflect this.. Although data gaps exist, the best available data do not indicate that groundwater supplements streamflow in the Basin; this would imply gaining streams, where streamflow increases as the stream flows through the Basin due to aquifer discharge to the creeks. The GSP is a groundwater management plan. There are numerous factors that affect instream flow conditions, including rainfall in the contributing watershed, temperature, evapotranspiration, etc. It is not within the purview of this GSP to manage these contributing factors, or to mandate instream flow conditions. The purpose of the GSP is to propose a groundwater management framework that does not imp negatively impact flow conditions in a significant or unreasonable fashion. Responses to individual comments are included below.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Dan Wilson (NOAA's NMFS)	Section 3	NA	<u>Interconnected Surface Water:</u> The draft GSP appears to inappropriately conclude there is no interconnected surface water (ISW) within the Carpinteria groundwater basin. The conclusion appears based upon the argument “that in the Recharge Area, basin creeks are all losing creeks and represent principal sources of recharge to the basin”, which is inconsistent with the definition of ISW found within the SGMA regulations. SGMA regulations (23 CCR §§ 354.22, 354.26 (d), 354.28(a) and 354.28(e)) defines ISW as “surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted.” Losing streams can meet the above definition, and appear to do so within the Carpinteria basin. For instance, the groundwater system water budget computed in Chapter 3 acknowledges streamflow percolation to the underlying aquifer occurs within the basin, and has occurred in all but three years during 36-year historical water budget period (Table 3-9). The current water budget (Table 3-13), based upon the water years 2012-2020, also notes significant streambed percolation, as does the narrative on page 3-139. Assuming a continuous saturated zone was present when streamflow percolated to groundwater, surface water and groundwater were at some point interconnected. If data exists that suggests a saturated zone between surface water and groundwater has never existed during the analyzed period of record, the GSP should present that data. The draft GSP does not identify minimum thresholds or measurable objectives for depletion of interconnected surface water. Absent a clear demonstration that interconnected surface water or undesirable results related to interconnected surface water depletion are not present or are unlikely to occur, the GSA must develop initial sustainable management criteria as required by SGMA regulations. (23 CCR §§ 354.26(d); also see “DWR Best Management Practices for the Sustainable Management of Groundwater: Sustainable Management Criteria (DRAFT), November 2017”, available at: https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents) NMFS recommends the GSA follow guidance from California Department of Fish and Wildlife (2019) and develop conservative streamflow depletion thresholds as a cautionary principle until the surface flow/groundwater dynamic in the Carpinteria basin is better studied and understood.	Text regarding this conclusion has been expanded in Section 3.2.6 to explain our reasoning more clearly. We reference DWR's classification identifying gaining, losing, and <i>disconnected</i> streams (Figure 3-43). It is not simply that the streams are losing streams, which we base our conclusion on, but the fact that even under the wettest conditions (as exemplified by spring 2005 water levels), there is still a significant observable distance between the channel bottom elevation (from DEM data) and the water table elevation. We maintain that the results of the analysis display that the distance between the channel bottom and the water table indicates the lack of a continuous saturated aquifer between the channel and the water table, and thus indicates a condition of disconnected streams (Figure 3-43c). A disconnected stream, by definition, has no interconnected surface water. Because this analysis indicates a hydraulic disconnection between the streams and the aquifer, we have not identified MTs or MOs for this sustainability indicator. A disconnected stream still percolates infiltrated water to recharge the aquifer during storm events. The inclusion in the water budget of recharge by stream percolation does not negate the conclusion of a disconnected stream. SGMA requires use of the best available data and science in analyses supporting the GSP. The DEM data has a high degree of confidence. The groundwater elevation contours are based on approximately 40 wells, including several located along basin creeks; although there is by necessity interpolation involved in generating these surfaces, there is still a high degree of confidence in this data. It is acknowledged that there is not much surface water streamflow data available in the basin. This is recognized as a data gap in section 6.14 and identified as an area where additional data could be helpful to basin management.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Dan Wilson (NOAA's NMFS)		NA	<u>Characterization of Undesirable Results</u> : The draft GSP defines the undesirable result for depletion of interconnected surface water using the SGMA regulatory definition, i.e., “depletion of interconnected surface water that has significant and unreasonable adverse impacts on beneficial uses of surface water.” We recommend the GSA also define what adverse impacts are considered “significant and unreasonable” with regard to beneficial uses of surface water identified by the State Water Board (2019 Central Coast Basin Plan, found at https://www.waterboards.ca.gov/centralcoast/publications_forms/publications/basin_plan/) (i.e., cold freshwater habitat; rare, threatened, or endangered species; migration of aquatic organisms; and spawning reproduction, and/or early development). Also, per SGMA regulation (23 CCR §§ 354.26 (a) and 354.26(b)), the draft GSP should describe the processes and criteria used to develop the ISW depletion undesirable result, the cause that would, or has led, to the undesirable result, and the criteria informing when and where the effects cause the undesirable result	Discussion of the analysis documented in Section 3.2.6 has been expanded from the original draft text to more clearly explain the methodology and conclusions. Because this analysis indicates a hydraulic disconnection between the streams and the aquifer, we have not defined MTs, MOs, or undesirable results for this sustainability indicator.
Dan Wilson (NOAA's NMFS)		NA	<u>Future Studies and Monitoring</u> : We recommend the GSA identify ISW depletion as a data gap, and propose studies and monitoring that will improve understanding of groundwater/surface water dynamics and how pumping impacts surface water beneficial uses. The mechanism by which stream-dwelling organisms are impacted by groundwater pumping is habitat degradation caused by the draw-down of surface flows (Barlow and Leake 2012). The impacts can be both physical (e.g., pool volume shrinks as water surface elevation declines) and chemical (e.g., water quality can suffer as pools and riffles lose connectivity). Thus, the appropriate method to determine whether pumping is having “significant and unreasonable adverse impacts” on beneficial uses of surface water is to understand the level of impact (i.e., volume of streamflow depletion) and how habitat quality and functionality change because of that impact.	It is acknowledged that there are data gaps in surface water flows of Rincon Creek and Arroyo Paredon Creek. This has been discussed in Section 6.14 of the Plan. However, data used to determine that the groundwater is disconnected from the surface water included the HCM, historic water levels and ground surface elevations. The GSA has high confidence in each of these of these data sets
Dan Wilson (NOAA's NMFS)	Sections 5 and 6	NA	<u>Steelhead as a Public Trust Resource</u> : When developing sustainable management criteria, and projects and management actions, the draft GSP appears to be missing adequate analysis and consideration of public trust resources, as required by the Public Trust Doctrine. A recent California Court of Appeal decision (Environmental Law Foundation v. State Water Resources Control Board (2018) 26 Cal.App.5th 844) held that the public trust doctrine must be considered—and public trust resources protected whenever feasible—in any decision governing groundwater withdrawals hydrologically connected to public trust surface waters. As noted above, SC steelhead, listed as endangered under the ESA, inhabit many of the navigable waterways (including Carpinteria Creek and Rincon Creek and tributaries) overlying the Carpinteria groundwater basin, and should be considered a public trust resource. The final GSP should adequately explain how proposed sustainable management criteria protect public trust resources like instream habitat utilized by endangered steelhead.	It is recognized that steelhead are an environmental public trust resource in the Basin. Text has been added to section 3.2.7 to document listed species in the Basin. Our analysis, as described in Section 3.2.6, indicates that the groundwater is not hydrologically connected to the surface water, due to the observed distance between channel bottom elevation and groundwater elevation during the wettest periods. Therefore, SMCs were not developed for the interconnected surface water sustainability indicator.
Heather A. Pert (CDFW)	General Comment	NA	The California Department of Fish and Wildlife (CDFW) is providing comments on the Carpinteria Groundwater Sustainability Agency's (CGSA) Draft Groundwater Sustainability Plan (Draft GSP). The Draft GSP on the Carpinteria groundwater basin (Basin) was prepared pursuant to the Sustainable Groundwater Management Act (SGMA). As trustee agency for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native	The GSA thanks CDFW for their comments. We are aware of the historical presence of steelhead trout and other sensitive species in the basin creeks, and have added text to section 3.2.7 to reflect this. Individual comments are addressed below.

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			plants, and the habitat necessary for biologically sustainable populations of such species (Fish & Game Code §§ 711.7 and 1802). Development and implementation of groundwater sustainability plans (GSPs) under SGMA represents a new era of California groundwater management. CDFW has an interest in the sustainable management of groundwater, as many sensitive ecosystems and species depend on groundwater and interconnected surface waters, including ecosystems on CDFW-owned and managed lands within SGMA-regulated basins. SGMA and its implementing regulations afford ecosystems and species-specific statutory and regulatory consideration, including the following as pertinent to GSPs: • GSPs must identify and consider impacts to groundwater dependent ecosystems (GDEs) [23 CCR § 354.16(g) and Water Code § 10727.4(l)]; • Groundwater Sustainability Agencies must consider all beneficial uses and users of groundwater, including environmental users of groundwater [Water Code §10723.2 (e)]; • GSPs must identify and consider potential effects on all beneficial uses and users of groundwater [23 CCR §§ 354.10(a), 354.26(b)(3), 354.28(b)(4), 354.34(b)(2), and 354.34(f)(3)]; • GSPs must establish sustainable management criteria that avoid undesirable results within 20 years of the applicable statutory deadline, including depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water [23 CCR § 354.22 et seq. and Water Code §§ 10721(x)(6) and 10727.2(b)], and describe monitoring networks that can identify adverse impacts to beneficial uses of interconnected surface waters [23 CCR § 354.34(c)(6)(D)]; and, • GSPs must account for groundwater extraction for all water use sectors including managed wetlands, managed recharge, and native vegetation [23 CCR §§ 351(al) and 354.18(b)(3)]. Furthermore, the Public Trust Doctrine imposes a related but distinct obligation to consider how groundwater management affects public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to surface waters are also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses (<i>Environmental Law Foundation v. State Water Resources Control Board</i> (2018), 26 Cal. App. 5th 844; <i>National Audubon Society v. Superior Court</i> (1983), 33 Cal. 3d 419). Accordingly, groundwater plans should consider potential impacts to and appropriate protections for interconnected surface waters and their tributaries, and interconnected surface waters that support fisheries, including the level of groundwater contribution to those waters. In the context of SGMA statutes and regulations, and Public Trust Doctrine considerations, groundwater planning should carefully consider and protect environmental beneficial uses and users of groundwater, including fish and wildlife and their habitats, groundwater dependent ecosystems, and interconnected surface waters.	

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Heather A. Pert (CDFW)	General Comment	NA	CDFW supports ecosystem preservation and enhancement in compliance with SGMA and its implementing regulations based on CDFW expertise and best available information and science. CDFW offers the following comments and recommendations below to assist CGSA in identifying and evaluating impacts on biological resources including GDEs within the adjacent groundwater basins. CDFW may provide additional suggestions for CGSA's consideration as the Draft GSP is revised.	Thank you for the comments. They are duly noted and maintained for the record. Individual comments on the GSP are addressed below.
Heather A. Pert (CDFW)	Section 1	11	1. Comment #1: Interconnected Surface Water (Executive Summary 2.4 of Draft GSP) The Draft GSP states that there are no interconnected surface waters in the Basin. a. Issue: Page ES-11 of the Draft GSP states, “[i]t is concluded that there are no interconnected surface water systems in the Basin (see Section 3.2.7).” b. Concern: The Hydrogeologic Conceptual Model (HCM) used to determine that there are no interconnected surface waters is based on a Geotechnical Consultants, Inc. report (Draft GSP, pg. ES-5) from 1976. CDFW is concerned CGSA's reliance on a nearly 50-year-old report to determine the absence of interconnected surface waters within the Basin may be inadequate. The Draft GSP acknowledges that the HCM has data gaps regarding the structure and aquifer parameters of Storage Unit #2 (the Basin is separated into Storage Unit #1 and Storage Unit #2) and a historical lack of hydrogeologic investigation in the Ventura County portion of the Basin (Draft GSP, pg. 3-33). c. Recommendation: CDFW recommends the CGSA commence additional studies and propose a schedule for the next 5 years to fill in the data gaps associated with the HCM. Examples of informative studies that could be used include the installation and data analysis of monitoring wells near potential interconnected surface waters and pairing multiple-completion wells with additional streamflow gages. This will facilitate an improved understanding of surface water-groundwater interconnectivity and subsurface recharge channels. CDFW recommends CGSA determine their approach to resolve these data gaps, including a timeline to do so, in the GSP prior to its adoption. CDFW recommends that this data be used to supplement and/or update the HCM to evaluate if there are interconnected surface waters.	The GSA does not believe that the Geotechnical Consultants, Inc. report is flawed simply because it was produced in the 1970s. The hydrogeologic conditions that are documented in that report are comparable to conditions in the present day. Significant work has been done in 2022 to update the basin setting including the HCM using available new data. The desktop analysis presented in Section 3.2.6 uses DEM land surface data and groundwater elevation contours derived from over 30 wells across the Basin, including wells proximate to the basin creeks. This is the best available data available at present, and it is considered to have a high degree of confidence. This analysis indicates that the basin creeks are hydraulically disconnected from the groundwater in the aquifer (Figure 3-43 [Part C]), even during wet weather periods. it is acknowledged that there are data gaps in surface water flows of Rincon Creek and Arroyo Paredon Creek. This has been discussed in Section 6.14 of the Plan. However, data used to determine that the groundwater is disconnected from the surface water included the HCM, historic water levels and ground surface elevations. The GSA has high confidence in each of these of these data sets

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Heather A. Pert (CDFW)	Section 3	29	2. Comment #2: Prepare Groundwater Dependent Ecosystem Assessment (Section 4 and Section 5 of Draft GSP) The Draft GSP does not include minimum thresholds, measurable objectives, or sustainable management criteria to protect GDEs. a. Issue: Page 5-29 of the Draft GSP states, “it is acknowledged that there are potential data gaps in the Carpinteria Basin with respect to groundwater dependent ecosystems (GDEs), which the GSA can continue to pursue. GDEs are affected by groundwater elevations in their vicinity. Two areas of potential GDEs were identified that may require additional investigation during the first 5-year SGMA implementation period.” b. Concern: CDFW is concerned with the Draft GSP’s disregard for the potential GDEs along the Arroyo Paredon Creek and Rincon Creek in the Basin and has not established interim minimum thresholds, measurable objectives, or sustainable management criteria to protect GDEs from undesirable results. These potential GDEs consist of mixed riparian and coastal oak woodland habitats. Mixed riparian habitat is considered highly valuable within the Basin because it provides habitat for many plant and wildlife species, filters pollutants, provides bed and bank stabilization/erosion control, and moderates hydrologic flows during the wet season. Coastal oak woodland habitat is also considered to be of high biological value for its varying degree of canopy coverage that provide complex understory environments of shrubs, grasses, and forbs that provide wildlife habitat. CDFW understands that there are data gaps that CGSA needs to pursue; however, the lack of establishing interim minimum thresholds may adversely impact GDEs during the first five years of the SGMA implementation period. c. Recommendation: CDFW highly recommends that the CGSA provide appropriate consideration to GDEs by developing minimum thresholds, measurable objectives, and sustainable management criteria to prevent undesirable results to GDEs. To fill in data gaps, CDFW recommends the installation of shallow groundwater monitoring wells near GDEs to ensure that groundwater use is not affecting soil saturation at the root depths of GDEs.	The GSA used NCCAG data for potential GDEs developed by The Nature Conservancy (TNC), along with groundwater elevation contours generated from historical data, as a basis for its analysis of potential GDEs. The use of a 30-foot depth to water criteria for screening out NCCAG polygons is a methodology that has been employed by other GSPs that have been accepted by DWR. This analysis, described in Section 3.2.7, screens out any of the NCCAG polygons in the confined area of the Basin because they are separated from the principal aquifer by the fine-grained sediments of the confining layer. Most of the NCCAG polygons in the recharge area had depth to water of greater than 30 feet indicated by the data, and so were screened out. This analysis identified four areas with potential GDEs identified (two along Arroyo Paredon, and two along Rincon Creek [Figures 3-52 and 3-53]), that are identified as requiring additional characterization during the initial 5-year SGMA implementation period.

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Heather A. Pert (CDFW)	Section 1	11	3. Comment #3: Terrestrial and Aquatic Special-Status Species Occurrence (Executive Summary-2.6 of Draft GSP) The Draft GSP does not document terrestrial and aquatic special status species occurrences within the Basin. a. Issue: Page ES-11 of the Draft GSP states, “GDEs are defined under SGMA as “ecological communities of species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface.” b. Concern: CDFW is concerned with the Draft GSP’s lack of documentation on terrestrial and aquatic species occurring in the Basin. The Basin has GDEs and habitat that supports the federal Endangered Species Act (FESA) listed and the California Endangered Species Act (CESA) candidate-listed southern California steelhead (<i>Oncorhynchus mykiss</i> or steelhead); California red-legged frog (<i>Rana draytonii</i>), which is listed as a threatened species under the FESA and is a California species of special concern (SSC); least Bell’s vireo (<i>Vireo belli pusillus</i>), which is listed as an endangered species under the FESA and CESA; and southwestern willow flycatcher (<i>Empidonax traillii extimus</i>), which is listed as an endangered species under the FESA and CESA. According to CDFW’s California Natural Diversity Database (CNDDDB; CDFW 2023), additional CDFW SSC’s occurring in the area include yellow warbler (<i>Setophaga petechia</i>), yellow-breasted chat (<i>Icteria virens</i>), Cooper’s hawk (<i>Accipiter cooperi</i>), arroyo chub (<i>Gila orcuttii</i>), southwestern pond turtle (<i>Actinemys pallida</i>) (On October 3, 2023, the U.S. Fish and Wildlife Service proposed to list southwestern pond turtle, a species from central and southern California and Baja California, Mexico, as threatened species under the FESA. If the proposal is finalized, it would add the southwestern pond turtle to the List of Endangered and Threatened Wildlife and extend the Act’s protections to the species.), and two-striped garter snake (<i>Thamnophis hammondi</i>). These species utilize habitats identified in the Draft GSP as known GDEs and potential GDEs. c. Recommendation: CDFW recommends the CGSA utilize the CNDDDB occurrence data and also add and address the following species in the Final GSP: steelhead, least Bell’s vireo, southwestern willow flycatcher, California red-legged frog, yellow warbler, yellow-breasted chat, Cooper’s hawk, arroyo chub, southwestern pond turtle, and two-striped garter snake.	The GSA thanks NMFS for their comments. We are aware of the historical presence of steelhead trout and other sensitive species in the basin creeks, and have added text to section 3.2.7 to reflect this.. References have been added to the text to document the species listed in this comment.
Heather A. Pert (CDFW)	General Comment	NA	4. Comment #4: Draft GSP vs. Final GSP Streamlining the comparison of the Draft GSP and Final GSP. a. Issue: CGSA may need to revise the GSP before it is finalized and adopted. b. Recommendation: CDFW recommends the CGSA provide a red-lined version of the Final GSP to understand the changes made between the Draft GSP and Final GSP. Alternatively, CDFW recommends the CGSA provide a summary of changes made and comments addressed by the CGSA in preparation of a Final GSP.	A red-lined version of the final GSP will be made available upon request.
Heather A. Pert (CDFW)	Section 3	NA	5. Comment #5: Cannabis Cultivation Accounting for current and future cannabis cultivation water uses within the Carpinteria River Basin.	No specific analysis targeting cannabis cultivation is included in the GSP. Cannabis water use is included in projected water use for agriculture in future water budget analysis and groundwater

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			a. Issue: The Draft GSP does not evaluate potential groundwater effects from cannabis cultivation for current and future groundwater management trends. Without this evaluation, the effects of this water intensive crop may be overlooked throughout Carpinteria River Valley. b. Concern: CDFW has identified Carpinteria River Valley as a priority watershed for cannabis permitting, enforcement, and compliance. The majority of cannabis projects within this area are clustered in the Santa Monica Creek and Carpinteria Creek HUC 12 watersheds. This includes steelhead streams Arroyo Paredon, Carpinteria, and Gobernador creeks (NMFS 2013). Since the implementation of legal cannabis cultivation, CDFW has received 45 applications within the Carpinteria River Valley, specifically in the HUC 12 watersheds listed above. Cannabis cultivation is a water intensive crop that can have a significant impact on environmental beneficial users of groundwater. Cannabis groundwater wells provide water for the irrigation of water-intensive cannabis cultivation (assuming six gallons of water per day per plant; Bauer et al. 2015). Some of the cannabis grows can range from 1- 8 acres, with multiple licenses on a property (resulting in several acres of cultivation). CDFW is concerned that by not accounting for existing cannabis use, which is water intensive and likely to increase overtime, the GSP may underestimate groundwater demand in the Carpinteria River Valley. Groundwater and interconnected surface water depletion are a major concern for fish and wildlife beneficial users in the Carpinteria River Valley. Designating Carpinteria Valley as a medium priority cannabis watershed requires groundwater to be monitored and sustainably managed for the benefit of all beneficial users, including groundwater dependent vegetated communities and interconnected surface waters that are necessary to support riparian and aquatic habitat and the sensitive species therein (e.g., steelhead). Decreased stream flow may contribute to direct mortality if fish eggs are exposed, covered with silt, or left without sufficient oxygenated water. Water degraded in temperature or chemical composition can displace or limit fish populations. Additionally, phreatophytic vegetation is a critical contributor to nesting and foraging habitat for a wide range of species and can be sensitive by depth to groundwater threshold impacts. This sensitivity to groundwater level thresholds means that localized pumping and recharge actions altering groundwater levels can impact the health and extent of phreatophyte vegetation. Both decreasing (drying out) or increasing (drowning) groundwater elevation has the potential to stress phreatophytes depending on the plant species, groundwater elevation, and duration (e.g., short term wetness/dryness versus prolonged wetness/dryness) (Froend and Sommer 2015; Naumburg et al. 2005). Accounting for current and future cannabis cultivation within the Carpinteria River Basin is also particularly critical to the survival and recovery of steelhead. c. Recommendation: CDFW recommends CGSA review existing information on cannabis cultivation within Carpinteria River Valley and recommends it be factored into the Final GSP when evaluating groundwater management in current and future trends.	model runs. Details regarding assumptions made for projected agricultural use are included in Section 3.3 and Appendix F. Cannabis in Carpinteria is exclusively grown in green houses. An Acreage cap of 186 acres has been set by the County of Santa Barbara. Approximately 29 acres remains unutilized of the cap.

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Heather A. Pert (CDFW)	General Comment	NA	In conclusion, the Draft GSP does not comply with all aspects of SGMA statute and regulations, and CDFW deems the Draft GSP inadequate to protect fish and wildlife beneficial users of groundwater for the following reasons: 1. The Draft GSP does not identify reasonable measures and schedules to eliminate data gaps. [CCR § 355.4(b)(2)] (See Comments # 1, 2, 3, and 5); 2. The sustainable management criteria and projects and management actions are not commensurate with the level of understanding of the basin setting, based on the level of uncertainty, as reflected in the Draft GSP. [CCR § 355.4(b)(3)] (See Comments # 1, 2, 3, and 5); and, 3. The interests of the beneficial uses that are potentially affected by the use of groundwater in the Basin, have not been considered. [CCR § 355.4(b)(4)] (See Comments # 1, 2, and 3).	1. Data gaps are identified in Section 6.14. A management action is presented to undertake actions to reduce data gaps. A specific work plan for this action is not presented as part of the GSP, but is expected to be produced in the initial 5-year SGMA implementation period. 2. The GSA used the best available data on the physical characteristics of the Basin, and data and methodology endorsed by The Nature Conservancy for analysis regarding GDEs. As additional or better data become available, the GSA is committed to using it. 3. The GSA believes that beneficial uses and users of groundwater have been considered, and are documented in section 5 of the GSP for each sustainability indicator.
Nate Irwin (Santa Barbara Channelkeeper)	General Comment	NA	Thank you for this opportunity to comment on the draft Carpinteria Groundwater Sustainability Plan. Santa Barbara Channelkeeper is a 501c3 environmental non-profit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds through science-based advocacy, education, field work and enforcement. We work from the Gaviota Coast to the Ventura River, and out to the Channel Islands. The Carpinteria Groundwater Sustainability Plan (CGSP) strives to allow for the Carpinteria Basin to achieve sustainability within 20 years of plan adoption. We are excited to see the positive effects that will come from the city of Carpinteria investing in the Carpinteria Advanced Purification Project, and applaud the effort the city is making to develop a plan to sustainably manage groundwater in the Carpinteria Basin. After a brief initial review of the plan, we believed it was important to highlight two areas we identified: the conclusion of no interconnected surface waters and degraded water quality in the basin. We respectfully submit the following comments and recommend that these issues are re-evaluated because of their importance in sustainably managing groundwater in the Carpinteria Basin.	Thank you for the general comments. They are duly noted and maintained for the record. Individual comments on the GSP are addressed below.
Nate Irwin (Santa Barbara Channelkeeper)			Interconnected Surface Waters We believe that there are interconnected surface waters in the Carpinteria Groundwater Basin. Protecting the species and ecosystems that rely on these interconnected surface waters is imperative to the overall health of the basin. The CGSP highlights that “no interconnected surface water systems have been identified within the Basin. Therefore, no monitoring network for this sustainability indicator has been established at this time.” Several creeks in the Carpinteria Basin are experiencing the undesirable result (under the definition provided in § 10721(x) of SGMA) of depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water. Rincon Creek, Carpinteria Creek, Franklin Creek and Santa Monica Creek are examples of this undesirable result occurring through groundwater extraction. According to the City of Carpinteria Creeks Preservation Program, creeks in Carpinteria have been substantially degraded by the “(a)lteration of natural hydrologic and geomorphologic processes due to withdrawals and inputs of surface and ground	In Section 3.2.6, the GSA presents analysis using the best available data that indicate that the creeks in the Basin are hydraulically disconnected from the underlying aquifer; i.e., there is no continuous zone of saturation between the surface water and the water table, even under wet year conditions. The GSA is aware that some creeks in the Basin have been “degraded,” this is assumed to be a reference to the concrete lining of Santa Monica and Franklin Creeks. This project was implemented in the 1980s for the purposes of flood control and benefit of local property owners. The potential de-lining of these creeks is presented as a potential recharge enhancement project (Section 6.8). An engineering feasibility and ranking study is recommended as a management action in the early part of the initial 5-year implementation period (Section 6.15). It is documented in Figure 3-44 that groundwater elevations in the primary aquifer are higher than the channel elevation in the confined area of the basin in Santa Monica Creek and Franklin Creek. However, in the Confined Zone of the Basin, the principal aquifer is separated from the creek channels by the fine-grained sediments of the confining layer. The confining layer is not used for any significant groundwater production, and is not considered a primary aquifer. Since there is no pumping in the confining layer, it is not considered manageable under SGMA.

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			waters.” (City of Carpinteria creeks preservation program final document volume One. (2005) Available at: https://carpinteriaca.gov/wp-content/uploads/2020/03/cd_creeks-report.pdf (Accessed: 31 October 2023). (“City of Carpinteria, (2005)”). This document also emphasizes the fact that local creeks are intimately linked to groundwater, most importantly surface water flows from local creeks as an important source of groundwater recharge, most notably during high creek flows. (City of Carpinteria, (2005)) According to the CGSP, water elevations were higher than the creek bottom elevations along Santa Monica and Franklin Creeks within the confined area during the spring of “wet year 2005.” This signifies that these creeks are interconnected to groundwater during wet years, leading to streamflow depletion when pumping is occurring near these streams. Well pumping along creeks creates what is called a “cone of depression” in the water levels around a well. (Barlow, M., and Leake, A. Streamflow depletion by wells—Understanding and managing the effects of groundwater pumping on streamflow. U.S. Geological Survey Circular, 1376, 84 p. Available at: http://pubs.usgs.gov/circ/1376/(2012). (“Barlow, (2012)”) This area of depression pulls water from streams into the cone, reducing streamflow. (Barlow, (2012)) Santa Monica and Franklin Creeks are below groundwater during wet years, and water captured through pumping consists of two possible sources—a reduction in the natural discharge (or outflow) rate of groundwater from the aquifer or an increase in the natural or artificial recharge (or inflow) rate to the aquifer. (<i>Id.</i>) The water that would normally support ecosystems downstream is instead captured in the cone of depression of the well, reducing streamflow. The Carpinteria Salt Marsh relies on flows from Franklin and Santa Monica Creek, primarily during high flow periods. (Carpinteria Salt Marsh Preserve (no date) - University of California Natural Reserve System. Available at: https://carpinteria.ucnrs.org/agenciesandgroups.html (Accessed: 01 November 2023)). Groundwater pumping should be monitored and addressed under the CGSP to ensure interconnected surface waters can support ecosystems like the Carpinteria Salt Marsh, and species, such as the endangered Southern California steelhead. NOAA’s Southern California Steelhead Recovery Plan (SCSRP) points to groundwater extraction and small surface diversions significantly altering flow regimes along the Conception Coast, “particularly in the lower stream reaches, and thus adversely affect(ing) both upstream and downstream fish passage and spawning and rearing opportunities.”⁷ A Critical Recovery Action for Carpinteria and Rincon Creek under the SCSR is to “(h)alt the unnatural dry-season reduction in the amount and extent of surface water to restore natural or pre-impact over-summering habitat characteristics and condition for steelhead.”⁸ The SCSR advises that Rincon and Carpinteria Creek should conduct a groundwater extraction assessment and analysis, and develop and implement a groundwater monitoring and management program. (<i>Id.</i>)	Groundwater pumping will be documented annually in the SGMA-required annual reports.

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Nate Irwin (Santa Barbara Channelkeeper)			Degraded Water Quality - Degraded water quality is an issue that should be addressed as a Tier 1 priority in the CGSP. There are increasing levels of TDS, chloride and Nitrate in many of the basin’s monitoring wells. Franklin Creek, Rincon Creek and Carpinteria Creek are on the State Water Boards TDML list.¹⁰ These trends are highlighting an increase in important health indicators, making water quality a sustainability issue that must be addressed by the GSA. According to the State Water Resources Control Board, the state drinking water standard for Nitrate is below 45 mg/L, specifically designed to protect infants,¹¹ and the Contaminant Level (MCL) for chloride is below 250 mg/L.¹² According to the CGSP, wells 19E1, 19K5, 19M1, 22R4 27E1, 28H1, 34B4, and 22R4 are all showing increasing trends in concentration of these contaminants. Franklin Creek is on the Central Coast Water Boards impaired waters list due to excessive levels of nitrate and phosphorus.¹³ This is due to fertilizer application, runoff from agricultural lands and urban lands, as well as base flow of nitrate impacted groundwater into streams within the Franklin Creek watershed.¹⁴ These water quality impairments are issues that need to be addressed and re-examined as tier 1 priorities.	All primary and secondary MCLs, including for nitrate, TDS, and chloride, are met for water delivered by CVWD for potable supply within their service area. Surface water quality in the creeks may be impacted by runoff from agricultural lands. Addressing this circumstance is beyond the mandate of SGMA or the scope of this GSP. This issue likely falls under the jurisdiction of the Regional Water Quality Control Board.
Curtis Cloud Thornton	Executive Summary	1	I strongly disagree with the statements of the district representatives that reclaimed water from the sanitation department will be —pure—. It is a foolish statement. Water is dynamic and pure is an impossible label for water. Spending tens of thousands of dollars on your information campaign offering propaganda is probably why no one is interested. It seems to me that the project is about to reach the fifty million dollar mark. I regret not speaking up about this sooner. As purely a layman with forty years experience as a researcher for Driscoll's and horticulturalist using water to produce hundreds of different varieties of fields and greenhouse flowers from San Diego country to San Mateo county I've relied on and had experience with almost a hundred sources of water in the state. From creek water in Pescadero and the discharged water from Newbury park in Santa Rosa creek to hydroponic rose growing operations in Watsonville to the well water from several locations in Salinas to Driscoll's research facilities with three sources of water including water from the Oxnard sanitation facility. I ran the Colorama Nursery on Via Real from 2001 to 2016 using exclusively Carpinteria district water. The water PH, frequently 8, and constantly high was toxic for some crops and reclaimed water has notoriously high PH. Now I'm only pointing out the harm from plants not my or others kidney stones that are caused by hard water.The public should be made aware of the facts about the high PH and the toxic concentrations of boron in the reclaimed water since reverse osmosis does not remove it. Also the amount of hormones and pharmaceuticals from human waste that will be pumped into our drinking water and the possible harm to mental health and early child development. I appreciate the opportunity to address this issue with my community and hope you're open to an honest evaluation of the negative aspects of this project and its effects on our most valuable resource.Curtis Cloud Thornton	The CAPP is proceeding in compliance with all applicable legislation and permitting considerations. However, the specifics of the implementation of the CAPP are beyond the scope of this GSP.
Curtis Thornton (Children’s Environmental Health Network)	Section 6	9	https://www.nrdc.org/sites/default/files/2023-05/pfas-mcl-affordability-letter-20230528.pdf https://www.nrdc.org/sites/default/files/2023-05/pfas-mcl-affordability-letter-20230528.pdf	Thank you for the reference. The GSA is aware of the ongoing regulatory actions regarding PFAS. These investigations are occurring under the authority of the RWQCB.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Curtis Thornton (Children's Environmental Health Network)	General Comment	9	https://www.nrdc.org/sites/default/files/2023-06/nrdc-pfda-iris-review-comments-20230609.pdf https://www.nrdc.org/sites/default/files/2023-06/nrdc-pfda-iris-review-comments-20230609.pdf	References noted.
Curtis Thornton (Children's Environmental Health Network)	General Comment	9	https://www.researchgate.net/publication/368054703_PHARMACEUTICALS_IN_WATER_CYCLE_A_REVIEW_ON_RISK_ASSESSMENT_AND_WASTEWATER_AND_SLUDGE_TREATMENT https://www.researchgate.net/publication/368054703_PHARMACEUTICALS_IN_WATER_CYCLE_A_REVIEW_ON_RISK_ASSESSMENT_AND_WASTEWATER_AND_SLUDGE_TREATMENT https://www.researchgate.net/publication/368054703_PHARMACEUTICALS_IN_WATER_CYCLE_A_REVIEW_ON_RISK_ASSESSMENT_AND_WASTEWATER_AND_SLUDGE_TREATMENT https://www.researchgate.net/publication/370079113_Water_Contamination_by_Estrogenic_Compounds_Review_Policy_Gaps_and_Recommendations_for_US_Federal_Regulation https://www.researchgate.net/publication/370079113_Water_Contamination_by_Estrogenic_Compounds_Review_Policy_Gaps_and_Recommendations_for_US_Federal_Regulation	References noted.
Suzette Chafey	General Comment	1	Trusting City of Carpinteria to do the logical, reasonable, affordable and sustainable plan to protect and support the community and agriculture.	Thank you for the comments. They are duly noted and maintained for the record. Individual comments on the GSP are addressed below.
Kim Jones (land owner)	Section 7	1	The current method of funding based on acreage with no regard to water usage, is not fair. The need for this plan is because we are using more water than the basin can sustainably provide. While the plan has language about having an equitable method of funding, it is not required and there is no reason to believe that the current funding method will change without expensive legal action by citizens to demand a fair and equitable funding method.	The methods that the GSA will use to generate fees in the future for ongoing GSA activities through the 20-year SGMA implementation period have not yet been determined. It is anticipated that these methods will be finalized in the first 1 to 2 years of the initial 5-year SGMA implementation period.
Pete and Chuck Dal Pozzo (Dal Pozzo Ranch LLC)	Section 7	9	Section 7.8 of the Draft Groundwater Sustainability Plan states that the fee program is likely to be based on non-metered (estimated) pumping.; However, there should be an option for those stakeholders who would rather report their pumping using well meters instead of an estimated pumping amount; This option would give those stakeholders who desire to use meters a far more accurate way of reporting their pumping. It would also give the Carpinteria GSA and the Carpinteria Groundwater Basin a head start on all the benefits of well metering as described in sections 6.10.1 and 6.10.2.	The GSA will consider using metered data for those private pumpers who wish to install and utilize meters for their wells. Other indirect methods will also be considered.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Alison Johnson	Section 5	8	Concerns and questions: Are all property owners aware and/or duly informed what a water use budget may do the their property value? Potential home buyers considering Carpinteria may be told, Oh, you don't want to buy in Carp! The Water District controls your water use. You do not! This will translate into fewer home sales, less property taxes and therefore less money for our city.Do you (as a panel, with the most knowledge)present our dire situation directly to the City Council and potentially make serious warnings/recommendations to the Council to halt any future developments until this budget is one-hundred percent fully understood by all the residents and businesses already established here in Carpinteria? You represent this town with your 'future' mastery of groundwater use implications. No new developments should be considered until any and all implications of the water budget is completely understood by everyone here. Wouldn't it be wise, as "ground water guardians"; to recommend installing open pavers at the train station Parking Lot #3 to help capture precious ground water? (The ballot to rezone the lot had seriously confusing wording and the votes cast most likely misread them. The numbers were very close). Pro-active actions, like a moratorium on future development, installing open pavers, etc. are what we need to do now for the enduring future of this extraordinary small and special city.	The District uses both delivered surface water from the State Water Project and the Cachuma Project, in addition to groundwater, to provide supply to its service area. CVWD has determined it has sufficient water supplies in its 2020 Urban Water Management Plan. Projects and management actions discussed in Section 6 of the GSP are intended to avoid undesirable results in the future. Conservation and efficiency programs are discussed as a management action in Section 6.12. Discussions of specific local zoning ordinances are not within the scope of this GSP.
Bill Harz	Section 3	0	Not considered that we live in a active seismic area. last Fridays 4.0 earthquake reminded me of a hydrology article I read a number of years ago concerning the Ventura's ground water basin. It mentioned after the 1872 lone pine earthquake that a number of water wells in the Oxnard plain went artisan, one well shot out cobbles the size of hens eggs. This I believe represented that the shaking from almost 100 miles away caused a loss of storage capacity in the aquifer. I mention this as an additional need to be conservative in calculating safe yields in our aquifer.	It is understood that seismic activity may affect water levels in wells, but the effects are generally temporary, and water levels commonly return to static conditions after the earthquake event.
Noah Boland (Heal the Ocean)	General Comment	359	I found some typos throughout the text. It is noted that prior to 2019 seawater intrusion had not historically been detected in existing wells in the basin; however, before 2019 there were no monitoring wells along the coast were designed detected seawater intrusion. The CVWD El Caro Well, which pumps all three Basin aquifer zones, is located about two miles east of the Sentinel Wells.	This comment correctly notes that there were no sentinel wells along the coast prior to 2019. However, the statement that no seawater intrusion has been observed historically (in wells existing at the time) is accurate. Expansion of the Sentinel Monitoring Well network is recommended as a Tier 1 project. These will provide a notification before seawater advances to active private wells or municipal wells.
Alan Soicher	Section 6	27	Recommend to develop and start implementing a Groundwater Recharge Plan as a Tier 1 action (first five years) in the Carpinteria Basin. This would involve expanding significantly on the “desktop level feasibility analysis and ranking study” described under Section 6.7 Recharge Enhancement Projects. The Groundwater Recharge Plan would include a thorough identification of all possible recharge enhancements in the basin, identification of the potential impacts of those enhancements, engineering feasibility analysis, cost-benefit analysis, and identification of funding mechanisms and partnerships needed for implementation. The planning effort would be followed by initiation of high priority actions identified in the Groundwater Recharge Plan during the first five years of GSP implementation. Please see article in November 2, 2023 Coastal View News (page 5) for more information on this topic, and please include the text of the article by reference in this comment.	The first step in assessing the potential success of recharge projects is an engineering desktop study evaluating project feasibility, likely costs, benefits, and potential constraints to implementation. Such a study is recommended to be conducted as a management action during the initial 5-year SGMA implementation period (Section 6.15). Land availability for recharge basins, real estate costs, source water availability, and potential impacts to neighboring residential areas can be assessed in a desktop study, prior to proceeding with project implementation. In the view of the GSA and Technical Advisory Committee, assigning these projects to Tier 1 status is premature without such a feasibility study.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Alan Soicher	Section 3	67	Recommend to re-evaluate the applicability of the methodology used in Section 3.2.6 for assessing interconnected surface water systems, and to update the methodology as needed to address the hydrogeomorphic conditions and processes specific to the Carpinteria Basin. Section 4.4.6 (page 4-34) notes that characterization of interconnected surface water systems may be a data gap in the Carpinteria GSP. The re-evaluation of the applicability of the methodology may lead to establishment of criteria in Section 5.10 for interconnected surface water, and is likely to have implications for Section 3.2.7 regarding Groundwater Dependent Ecosystems (GDE).	Text regarding this conclusion has been expanded in Section 3.2.6 to explain our reasoning more clearly. We reference DWR's classification identifying gaining, losing, <i>and disconnected</i> streams (Figure 3-43). It is not simply that the streams are losing streams, which we base our conclusion on, but the fact that even under the wettest conditions (as exemplified by spring 2005 water levels), there is still a significant observable distance between the channel bottom elevation (from DEM data) and the water table elevation. We maintain that the results of the analysis display that the distance between the channel bottom and the water table indicates the lack of a continuous saturated aquifer between the channel and the water table, and thus indicates a condition of disconnected streams (Figure 3-43c). A disconnected stream, by definition, has no interconnected surface water. Because this analysis indicates a hydraulic disconnection between the streams and the aquifer, we have not identified MTs or MOs for this sustainability indicator. Lack of surface water flow data in the basin is identified as a data gap in Section 6.14.
Paul Kops	Section 7	9	It's unconstitutional to charge any of the fees mentioned in Section 7.8 groundwater extraction charges, monthly fixed charges and variable pumping fees, assessments/parcel taxes, and parcel fees. There are many water well owners who are not big Marijuana farms. Those big farms are solely responsible for the excessive extraction of groundwater. But the GSA wants to penalize the little guy, the small independent farmer. It's not fair at all. Anyone with a legal well already paid the fees and taxes to have it tested, built, and registered. It's unlawful only to charge water well owners, too, as these fees would not specifically benefit any well owners. Sustainably would benefit all residents of Carpinteria, so if there are any fees, then every resident should have to pay. And if everyone is paying, then it's a tax, which would require a majority vote on the ballots to pass. And we all already pay the Carpinteria GSA special property tax, so how much more funding do you need? I believe it would be an outrageous overreach of the local government to force these few small individuals to pay for something that doesn't directly benefit them. The rules of Prop 13, 218, and 26 clearly explain how none of these funding sources mentioned above are illegal.	The SGMA legislation empowers GSAs to assess fees for ongoing management and SGMA project implementation costs and maintenance. The specific methods and mechanisms for assessing future GSA fees have not been determined. Public input will be solicited and considered, and GSA legal counsel will provide advice to ascertain that all GSA administration is in compliance with state law and local regulations. GSA fees apply to all users of groundwater including the Carpinteria Valley Water District. These fees are paid by the rate payers of Carpinteria.
Jim Bailard	General Comment		Enclosed are my comments on the draft GSP. My comments include three sections: a) general thoughts and comments relating to broad issues and specific sections of the report, b) general conclusions and recommendations stemming from a), and finally c) brief comments and typos related to specific pages of the report. The report represents a substantial effort on the part of the Agency and its contractors and will provide a guide for moving forward in the management of the valley's groundwater. It was a pleasure serving as a member of the Advisory Committee.	Comments received and responses are provided below.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Jim Bailard	Section 3		1. Modeling and measurements indicate that the groundwater supply has been out of balance for several decades with a significant deficit between water extraction and re-supply. 2. The State's recommended groundwater model may be too simplistic to adequately incorporate predicted climate change effects. The perturbed precipitation input data methodology is unable to include the "flashiness" of future rainfall patterns with shorter, more intense rainfall events and longer periods of intense drought. A probabilistic model (e.g., Monte Carlo Simulation) might be more useful in answering questions about future groundwater supplies and guiding future management actions. 3. Model predictions of future groundwater supplies may be overly optimistic. In spite of clear evidence of a long-term deficit in groundwater supplies, model predictions show a surplus of water at the end of the simulation period even when mitigating actions are not included. This result seems unlikely. 4. Private pumping volumes are not well known in spite of being an important component of the groundwater budget. The installation of meters on all active would provide this valuable and needed data. 5. Groundwater modeling suggests that seawater intrusion has been a problem in the basin for decades. Recent measurements show brackish water in the lowest aquifer zone near the coast. The intrusion process is poorly understood. Additional geological measurements are needed coupled with the development of a 3-D, variable density, groundwater model. 6. Basin groundwater levels are currently depressed leaving little buffer against ongoing/future periods of drought.	1. It is noted that the water budget results indicate a historical deficit between recharge and discharge, which has been exacerbated by the recent drought. 2. The GSA consultants followed DWR guidance in modeling potential projected impacts of climate change on the hydrology of the central coast. Flashiness is represented in a non-linear perturbation to the historical hydrologic record, but it does not allow for the creation of rain events where none exist in the hydrologic record, or the elimination of rain events that occurred. Monte Carlo modeling analysis may be considered in future modeling analysis sponsored by the GSA. 3. The methodology for estimating future pumping is documented in Appendix F and utilizes assumptions consistent with District planning documents, including the general plan, the water resources plan, and the urban water management plan, 4. Metering will be considered for active wells in the Basin. Other methods of estimation will also be considered. 5. There is no modeling evidence suggesting decades of seawater intrusion. Increased chlorides in the Sentinel well data is only observed over the past 3 to 4 years. A density-dependent flow model will be considered during ongoing assessment of the conditions along the coast in the Basin. 6. Basin groundwater conditions are observed to be lowered in response to the recent drought. Groundwater responds to weather patterns much more slowly than surface water, and will continue to be monitored during the 20-year SGMA implementation period. This GSP is intended to provide a platform to maintain the knowledge base of hydrologic conditions in the Basin, and to provide the framework to establish adaptive management of groundwater in the Basin through annual reports, projects, and management actions.
Jim Bailard	Section 4		1. Evidence of seawater intrusion indicates the need for continued/additional monitoring actions. Depressed groundwater levels are the underlying cause of the intrusion. A water injection barrier will likely be needed to counteract this problem but is not considered an immediate priority in the report. The report calls for additional monitoring coupled with future modeling, design and construction of the barrier if warranted. This slow-go approach seems risky. 2. A 3-D seawater intrusion model (e.g., SEAWAT) would be helpful in guiding future monitoring efforts and assessing the need and timing for a water injection barrier.	1. Additional monitoring is recommended as a Tier 1 project. The possibility of needing a seawater intrusion barrier project is recognized, but additional data is needed along the coast before any serious design considerations can be commenced. 2. A density-dependent flow model may be sponsored by the GSA in the future.
Jim Bailard	Section 5		1. The report is inconsistent in its discussion of groundwater supply imbalance and seawater intrusion. In Section 5, these items are treated as issues of potential concern that may become more serious in the future. Later, in Section 6, both issues are treated as significant ongoing problems that require mitigation actions. Model results and monitoring data support the later position. 2. A probabilistic groundwater model might help the district identify better management plans and actions for the basin. The current model produces single, deterministic outcomes that leave the district with limited information relating to MO's, MT's and required management actions. A more useful product would be probabilities of various negative conditions occurring in the future in response to various projects and management actions. The idea would be to select an acceptable low probability value and take action to achieve that goal. Obviously, this approach cannot be pursued at this time, but the district might encourage the State Department of Water Resources to develop such a model for future use.	1. Unlike other coastal basins that have observed seawater intrusion for decades (e.g., Salinas, Oxnard), the observation of data that indicate seawater intrusion are, at this writing, confined to a single well and have been observed for approximately the past 3 years. Expansion of the sentinel well monitoring network is prioritized as a Tier 1 project to gather additional data along the coast. 2. Multiple probabilistic model runs were not scoped for this version of the GSP but will be considered for future analysis.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Jim Bailard	Section 6		1. The text states that the Carpinteria GSA may choose to collaborate with other land use and regulatory agencies on future matters involving water supplies. It would seem that a more proactive stance is warranted since these issues go to the heart of the district's mission. 2. The CAPP is clearly needed at this time. It will help restore depleted groundwater supplies by increasing the rate of basin replenishment. 3. Monitoring and modeling suggest the water injection barrier project may be needed in the near future yet it is listed as a Tier 2 priority that may never be needed. It will be great if such an optimistic outcome takes place but it seems unlikely. Perhaps a combination of CAPP, shifting of CVWD pumping sites and reduction in private well pumping will do the trick. Given present uncertainties, it would seem prudent to begin making preparations for a barrier project. 4. Proposed management actions make no mention of increasing near-term groundwater levels as a buffer against future droughts. Such action would seem warranted given the present uncertainty of future rainfall patterns. 5. Proposed management actions do not prioritize the development of a 3-D model for seawater intrusion. This seems short-sighted given that such a model could be used to guide deployment of additional monitoring wells, refinement of the chlorinity iso-contour MT, and assessment of the need and timing for the water injection barrier project.	1. The text is intended to indicate the GSA's willingness to collaborate with other agencies, if all participants are in agreement. 2. The CAPP is proceeding and is prioritized as a Tier 1 project to be implemented in the initial 5-year SGMA implementation period. It is currently anticipated to be operational by 2026. 3. A seawater intrusion barrier project is assigned to Tier 2 status to allow for the expansion of the sentinel well monitoring network expansion to collect needed data. Sentinel well expansion may be viewed as preparatory for a barrier project if needed. Proceeding to implementation of a barrier project without collecting additional data would be premature. 4. Most if not all of the projects and management actions have the primary or ancillary goal of preventing the unreasonable decline of groundwater levels and reduction of groundwater in storage. 5. The management actions in Section 6.12 identify groundwater model updates, including development of a density-dependent flow model to simulate seawater intrusion, and incorporation of an interactive stream package to calculate surface water/groundwater interaction based on flow and aquifer conditions rather than direct definition of stream percolation.
Jim Bailard	Section 7		1. The discussion of private property water rights is confusing. The report calls for a hands-off approach, but leaves a lot of questions unanswered. For example, do private well owners have the right to pump as much groundwater as they choose in spite of negative consequences to the basin? If that's the case, how can the GSA manage groundwater supplies in a sustainable manner? If pumping limits must be set, how would this be done? Lots of unanswered questions.	SGMA addresses the sustainability of a groundwater basin, which can include reductions in pumping for all if necessary. "Water rights" addresses which users have the rights and what percentage of available groundwater each user has rights to. Under SGMA, the approach would be to work together to establish a fair division of available resources if necessary and include projects and management actions to get to and maintain sustainability. Under the "water rights" rubric division of groundwater resources would be handled in a legal forum, such as a court of law.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Jim Bailard	General Comments	NA	A. The GSA should require water meters be installed on all active wells. B. Predictions of future groundwater supplies should be viewed with caution due to limitations in the current groundwater model. Conservative management of groundwater supplies are warranted until better information is available. C. The report should use a more consistent approach in its discussion of water supply imbalance and seawater intrusion. These issues should be presented as significant problems that need mitigation in the near term, not as issues that may become serious in the future. D. The GSA should urge the California Department of Water Resources to develop a better groundwater model (perhaps probability-based) for use in GSP updates. E. The CAPP project should be completed as quickly as possible. F. The GSA should consider increasing near-term groundwater supplies as a hedge against ongoing/future droughts. G. The development of a 3-D seawater intrusion model should be prioritized as a near-term task. H. Priority should be given to pre-project tasks for a water injection barrier project allowing timely implementation if needed. I. Clarity should be sought in determining the GSA's ability to manage future groundwater extraction by private land owners. J. The GSA should consider taking a more proactive approach in influencing local land use decisions as they relate to water supply issues.	A. Metering is one option being considered to better measure private pumping in the Basin, as described in Section 6.10. B. It is the intent of SGMA to foster sustainable groundwater management over the 20-year planning horizon. C. Both of these issues are identified as significant management issues to be monitored and addressed during the SGMA implementation period. It is unclear at this point to what extent these issues were exacerbated by the recent drought, and to what extent they will continue into the future. Groundwater systems respond slowly to changing conditions, and the SGMA annual reports will document conditions, projects, and management actions on an annual basis during the 20-year planning horizon. D. It is the responsibility of the GSA to maintain and update the basin groundwater model, and appropriate revisions are expected in the future. E. The CAPP is scheduled for completion by 2026. F. Many of the projects and management actions, including water banking, ASR, and recharge projects, are intended to increase local supplies. G. A 3-D density-dependent flow model will be considered in the future. It would be most effective to consider this after completion of the Sentinel Well Network Expansion, when additional data along the coast is available. H. The Sentinel Well Network Expansion project is prioritized as a Tier 1 project. This is essentially a pre-project task required before consideration of a barrier project. I. This is a legal and policy consideration that will be considered during the implementation period. J. Comment noted. The GSA will strive for the most efficient management of the groundwater basin in concert with other local agencies.
Jim Bailard	Section 1	NA	Add a subsection near the front of the report listing definitions for all acronyms.	A list of Abbreviations and Acronyms is included at the beginning of the Plan. It is a standard list following accepted document production that provides the abbreviations and acronyms used and their definitions. Abbreviations and acronyms are defined in the Executive Summary and then in the report as a whole on first use and sometimes again. While a glossary with extended definitions for common terms is not provided for the Plan and will not be created, the "Definitions" section at the beginning of the Plan provides full definitions from the California Water Code and the CCR for many terms used in the Plan.
Jim Bailard	Section 3	Page 3-9 - Figure 3-4	Should there be a key for the various soil types? All Figures: Pages with figures need page numbers added.	A legend has been included for the various geologic formations presented in the figure. Page numbers are added to figures for the final GSP.
Jim Bailard	Section 3	Page 3-100- pt Paragraph	Second sentence should say"..... two single wet years in 2017 and 2019." Page 3-117 - Last Paragraph: Perhaps State Water Project should be spelled out instead of SWP?	Text revised.
Jim Bailard	Section 3	Page 3-127 - Last Paragraph	The last sentence says"... with the ocean is believed to be occurring, ..". This should be changed to "... with the ocean is occurring, ...".	Text is revised.
Jim Bailard	Section 4	Page 4-4 -1st Paragraph	RMS & SGMA should be spelled out/defined. Page 4-9- pt Paragraph: TDS should be spelled out/defined.	The definition for RMS has been added to Section 4 where it is first used. The definition for SGMA has been added to Section 4 where it is first used. TDS is defined in Section 4.3.1, so no change made.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Jim Bailard	Section 4	Page 4-11- pt Paragraph	BMP's should be spelled out/defined. Also, well density information should use consistent units - i.e., either #wells/sq-mile or #wells/100 sq-mile, not both.	The definition of BMP has been added to Section 4.4. The first units is expressed as documented in the original reference, which references pumping volume. The second units is more appropriate for a basin of area 12.7 square miles.
Jim Bailard	Section 4	Page 4-11- 2nd Paragraph	AB 3030 GMP should be spelled out/defined.	The definition for AB has been added to Section 4.3.1. GMP is already defined in Section 4.3.1, so no change made.
Jim Bailard	Section 4	Page 4-17 - 2nd Paragraph	East and west are reversed. MGD lies along the Basin's western boundary and Ventura County along its east boundary.	Corrected.
Jim Bailard	Section 4	Page 4-19 - Last Paragraph	It might be useful to mention what the specific data gaps are along the east and west boundaries. Also, how will these data gaps be addressed?	Text revised.
Jim Bailard	Section 4	Page 4-20 - 2nd Paragraph	The text speaks of a potential for seawater intrusion. In fact, Chapter 3 indicates that intrusion is already happening and has been for decades. Should the Chapter 4 text be changed to reflect this fact?	There is no evidence that seawater intrusion has been occurring for decades in the Carpinteria Basin. To date evidence has been observed in one well. Text is left as originally written.
Jim Bailard	Section 4	Page 4-33 - Middle of the Page	The text speaks of low groundwater conditions during the 1950's and early 1990's. Current conditions in many areas are also bad. Should this be stated?	A reference to the recent drought period is added.
Jim Bailard	Section 5	Page 5-2, Section 5.2	This subsection dealing with the definition of acronyms is extremely useful and should be replicated in other chapters. Acronyms should be defined whenever they are first encountered. It might be more efficient to provide a separate section at the front of the report defining all acronyms used in the report.	A list of Abbreviations and Acronyms is included at the beginning of the Plan. It is a standard list following accepted document production that provides the abbreviations and acronyms used and their definitions. Abbreviations and acronyms are defined in the Executive Summary and then in the report as a whole on first use and sometimes again. While a glossary with extended definitions for common terms is not provided for the Plan and will not be created, the "Definitions" section at the beginning of the Plan provides full definitions from the California Water Code and the CCR for many terms used in the Plan.
Jim Bailard	Section 5	Page 5-13, Figures 5-1 thru 5-8	An argument could be made that starting the timeline at 1940 gives an optimistic impression that groundwater supplies are doing pretty well. The 1940's and early SO's were a time when groundwater was the principal source of irrigation water for the valley. Once the Cachuma Reservoir came online in the mid-1950's, water supplies became more plentiful and groundwater levels rebounded reaching a maximum around 1985. After that, conditions changed and groundwater levels began to drop (ignoring ups and downs caused by wet and dry years) reflecting an imbalance between basin re-charge and pumped extraction. By contrast, if the timeline were changed to 1985 (i.e., the start of the historical precipitation model period), it would give a perhaps more realistic picture of current conditions.	The graphs start in the 1940s because that is the beginning of the period of record for water level data in some of the wells. It is recognized that land and water use conditions have changed over time.

Commenter	Section	Page/ Figure/ Table	Comment	Response
Jim Bailard	Section 5	Page 5-23, I51 Paragraph	This is another illustration of overly optimistic predictions. The text states that no undesirable effects occurred during the current drought period hence MT's can safely be set at the lowest levels observed during this time period. In fact, current water levels appear to cause ongoing seawater intrusion and there exists little room for continued drought. The CAPP project will greatly help to mitigate the current over-draft situation. Additional priority should be given to increasing groundwater levels in the short/medium term.	Undesirable results for the chronic lowering of groundwater levels are defined in Section 5.5.1 as those that impact the ability to provide potable water supply, or that indicate insufficient supply for agricultural operations as reported during interviews with agricultural representatives in the Basin. These conditions were not reported during the recent drought. Seawater Intrusion undesirable results are defined as impacting currently active wells, which has not been observed. However, seawater intrusion is repeatedly identified as a significant issue to be addressed in ongoing groundwater management in the Basin.
Jim Bailard	Section 5	Pages- 32, Middle of Page	Another example of rosy thinking. The text implies that groundwater levels could decline if increased pumping puts the basin out of balance. In fact, the basin water supply has been out of balance for the past 35 years. There are other places in the chapter where this comment applies.	Comment noted.
Jim Bailard	Section 5	Page 5-39, Bottom of Page	This paragraph does a much better job discussing the current seawater intrusion situation, describing it as an ongoing process that will require further monitoring and management action.	Seawater intrusion is recognized in the GSP as a significant issue to be monitored and addressed in the basin management, including a Tier 1 project for sentinel well network expansion.
Jim Bailard	Section 5	Page 5-45, Lower Page	Change, "An estimate of 0.15 used ..." to "An estimate of 0.15 was used ...". Page 5-48, Bottom of Page: Additional ERT surveys may have been mentioned in Chapter 4. If so, should they be mentioned here for consistency?	Calculations are generally referenced in the present tense. The ERT surveys are informative, but do not directly apply to the measurement of minimum thresholds, which this paragraph discusses.
Jim Bailard	Section 6	Page 6-2, Middle of Page	Land use decisions can have a significant impact on overall water use, including groundwater supplies. Shouldn't the GSA or CVWD take a more active position in providing input and feedback relating to water supplies?	The GSA intends to work with other agencies working toward groundwater sustainability.
Jim Bailard	Section 6	Page 6-14, Figure 6-2	The note in the top right corner of this figure doesn't show up properly in the digital document. I assume it will be corrected in the final printed report.	The legend for Figure 6-2 has been moved to the blank space.
Jim Bailard	Section 6	Page 6-15, Middle of Page	iso-contour is misspelled.	Isocontour (without a hyphen) is used in the rest of the Plan and is accepted use (see quote from SWCA in Section 5.7.2). No change made.
Jim Bailard	Section 6	Page 6-31, Middle of Page	The Intertie Project is mentioned in the text as being Tier 1 but it doesn't show up in the earlier list.	The text describing this project is revised from the Public Draft. The public draft included both the infrastructure intertie project and the potential water banking agreements in the same section, which was confusing. These are now addressed as separate projects in Section 6.5 and Section 6.9.
Jim Bailard	Section 6	Page 6-31, Middle of Page	Is the term "wheel" a specialized water resources word? Would "direct" be a better word?	“Water wheeling” is casual industry parlance. Text revised.
Jim Bailard	Section 7	Page 7-1, First Paragraph	The text refers to the Groundwater Sustainability Plan as the "Plan". Other sections refer to it as the GSP. Best to choose one or the other and be consistent.	GSP and Plan are used throughout the document and are both acceptable as definitions for Groundwater Sustainability Plan. A definition for GSP has been added to the Acronym list and GSP is now defined on first use in the text. Text has been added to the acronym list under the entries “GSP” and “Plan” to clarify this.

**RESOLUTION NO. 031
BOARD OF DIRECTORS
CARPINTERIA GROUNDWATER SUSTAINABILITY AGENCY
ADOPTING A GROUNDWATER SUSTAINABILITY PLAN FOR
CARPINTERIA GROUNDWATER BASIN**

WHEREAS, the California Legislature passed a statewide framework for sustainable groundwater management, known as the Sustainable Groundwater Management Act (California Water Code section 10720 et seq.), pursuant to Senate Bill 1168, Senate Bill 1319, and Assembly Bill 1739, which was approved by the Governor and Chaptered by the Secretary of State on September 16, 2014; and,

WHEREAS, the Sustainable Groundwater Management Act (SGMA) went into effect on January 1, 2015; and,

WHEREAS, SGMA requires all high- and medium-priority groundwater basins, as designated by the California Department of Water Resources (DWR) Bulletin 118, to be managed by a groundwater sustainability agency (GSA); and,

WHEREAS, the Carpinteria Groundwater Basin has been designated by DWR as a high-priority basin (DWR Bulletin 118 Groundwater Basin: 3-018); and,

WHEREAS, the Carpinteria Valley Water District, City of Carpinteria, Santa Barbara County Water Agency, and the County of Ventura formed a Joint Powers Authority which then elected on February 10, 2020 to become a GSA for the basin; and,

WHEREAS, the Carpinteria Groundwater Sustainability Agency was designated by DWR to be the Exclusive GSA for the Carpinteria Groundwater Basin on May 10 2020; and,

WHEREAS, Carpinteria Groundwater Sustainability Agency filed an initial notification of its intent to develop a GSP for the Basin in accordance with Water Code section 10727.8 on June 30, 2020; and,

WHEREAS, Carpinteria Groundwater Sustainability Agency has prepared a GSP for its boundaries in accordance with Water Code section 10727.2 to include all the components required by SGMA; and,

WHEREAS, Carpinteria Groundwater Sustainability Agency gave notice on October, 24 2023 pursuant to Water Code section 10728.4, to affected cities and counties regarding its intent to adopt a GSP; and,

WHEREAS, Carpinteria Groundwater Sustainability Agency gave notice on October 5th, 12th & 26th of 2023 to the public soliciting comments on the draft GSP; and,

WHEREAS, Carpinteria Groundwater Sustainability Agency gave notice on October 5th, 12th & 26th, November 16th & 22nd of 2023 as well as January 11th & 18th of 2024 to the public its intent to adopt a GSP on the draft GSP; and,

WHEREAS, Carpinteria Groundwater Sustainability Agency held public meetings to discuss the draft GSP with the GSA Board of Directors on October 25th and November 8th of 2023; and

WHEREAS, Carpinteria Groundwater Sustainability Agency held a public hearing on November 29, 2023 and January 24, 2024 for the purpose of receiving public comment and considering adoption of a GSP for the Basin; and

WHEREAS, Carpinteria Groundwater Sustainability Agency adopted the GSP by Resolution No.030 on Nov 29, 2023 and attempted to submit to DWR thereafter, however was unable to because of statutory time requirements between public noticing and adoption were not met; and

WHEREAS, Carpinteria Groundwater Sustainability Agency intends to rescind Resolution No. 030 and adopt this Resolution on January 24,2024; and

WHEREAS, upon adoption of a GSP, Water Code section 10733.4 requires that GSP to be submitted to DWR for review.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of Carpinteria Groundwater Sustainability Agency as follows:

1. The foregoing recitals are true and correct.
2. Resolution No. 030 is hereby rescinded
2. The GSP, in the form presented this day to the Board of Directors and subject to any final non-substantive edits that may be made at the Executive Director's discretion prior to submittal to DWR, is hereby approved and adopted.
3. The Executive Director is authorized and directed to timely provide notification of this approval and adoption to DWR, including a copy of this Resolution, the approved GSP, and any additional information required by law.

PASSED AND ADOPTED by the Governing Board of the Carpinteria GSA on the 24th day of January 2024, by the following roll call vote:

AYES:

NAYES:

ABSENT:

ABSTAIN:

APPROVED:

Case Van Wingerden, Board President

ATTEST:

Robert Mc Donald, Secretary



January 18, 2023

Bob McDonald, General Manager
Carpinteria Basin GSA
1301 Santa Ynez Avenue
Carpinteria, CA 93103

Proposal for First Annual Report for the Carpinteria Valley Groundwater Basin, Groundwater Sustainability Plan

Dear Mr. McDonald:

GSI Water Solutions, Inc. (GSI), is pleased to present this proposal to develop the first annual report for the Carpinteria Valley Groundwater Basin (Basin) Groundwater Sustainability Plan (GSP) for the Carpinteria Basin Groundwater Sustainability Agency (CGSA). GSI has partnered with the CGSA to develop the GSP since the beginning of the process and will be able to leverage this familiarity and first-hand knowledge to ensure on-time delivery and compliance with state regulations.

The GSP for the Basin outlines steps for achieving groundwater sustainability within 20 years. To measure the effectiveness of the plan and demonstrate to DWR that the Basin is on track to manage groundwater sustainably, the GSA will need to compile data and prepare annual reports that summarize the results of monitoring efforts, document changes in groundwater supplies, tabulate basin-wide groundwater use, and track the effectiveness of GSP implementation efforts. A report that accomplishes these requirements is due to DWR on April 1, 2024, soon after the GSP was submitted. The regulations require that the annual report be based on the preceding water year (a water year covers the period from October 1 to September 30). Because this is the first annual report, the data for this report will also include all new data from the end of the period of record of the GSP; thus the 2024 annual report for the Basin will report on data from October 1, 2021, through September 30, 2023.

Scope of Work

GSI developed the following scope of work based on our understanding of the requirements as outlined in the SGMA Emergency Regulations, and experience preparing various other annual reports to meet DWR standards.

Task 1 – Data Analysis and Representation

Several discrete data sets are required to be included in the annual report, including the following:

- Groundwater elevation data
- Groundwater extraction
- Surface water supply and use
- Total water use
- Change in groundwater in storage

The following sections describe the data types that will be presented as required in the annual reports. The datasets will be uploaded to the data management system (DMS) developed previously for the GSP in compliance with GSP requirements. These data will be uploaded to the DWR website as part of this task along with the annual report.

Task 1.1 Groundwater Elevation Data. Groundwater elevation data are primarily collected and compiled by the Carpinteria Valley Water District. These data may be augmented information from the United States Geological Survey (USGS) Nation Water Information System (NWIS), DWR California Statewide Groundwater Elevation Monitoring (CASGEM) program. Available groundwater elevation data will be downloaded from the USGS and DWR in conjunction with the quarterly groundwater monitoring events conducted by GSI.

Water level elevation contour maps of each of the primary aquifer will be prepared representing groundwater conditions in fall 2021, spring 2022, fall 2022, spring 2023, and fall 2023.

Water level elevation hydrographs (water levels plotted versus time) will be prepared for the 9 representative monitoring site wells, as well as all wells monitored for water levels by the GSA. Each of the hydrographs presented in the GSP will be updated with data through fall 2023.

Task 1.2 Groundwater Extraction. Groundwater extraction estimates were prepared for the GSP through 2020. These estimates will be updated using groundwater extraction information provided by CGSA. As the sole water purveyor in the Basin, CVWD maintains records of municipal pumpage, municipal pumpage provided to agricultural clients, and generates estimates of private agricultural pumpage in the Basin.

Task 1.3 Surface Water Supply. The regulations require that a description of surface water supplies available for use and actual annual surface water use be incorporated into the annual report.

Task 1.4 Total Water Use. GSI will compile and present total Basin water use information, including water sector, water source type, method of measurement, and a relative representation of accuracy of the measurement methodology (DWR standards in other annual report submittals that we are familiar with require qualitative judgments such as “high,” “medium,” and “low”).

Task 1.5 Change in Groundwater in Storage. Calculations of changes in groundwater in storage in each of the principal aquifers are calculated by calculating the difference in water levels between fall monitoring events, and generating a change in volume between these two periods. The difference between the volume of groundwater represented by these two groundwater level surfaces is then multiplied by a representative basin storage coefficient to obtain an estimate of change of groundwater in storage. This method is approved by DWR. GSI plans to use the same methodology for the first annual report. Changes in groundwater in storage will be calculated by comparing water level elevation data for successive fall periods for water years 2021, 2022 and 2023 and calculating the changes in volume of groundwater in storage between years.

Task 2 – Report Preparation

Because this annual report will be submitted so soon after the submittal of the GSP, it will have less information on meeting sustainability goals or achieving sustainability and instead will focus primarily on observed water level trends and groundwater storage changes since the GSP was developed. Initial efforts by the GSA to implement projects and management actions described in the GSP will also be described.

GSI will prepare an initial administrative draft report for GSA staff review. The report will be based on data collected and the analysis performed as described above, on other data that may become available, and on ongoing discussions with the GSA staff. The general organization of the report is expected to be the following:

- Executive Summary
- Introduction
- Basin Description (brief recapture of GSP description)
- Groundwater Conditions
 - Groundwater Monitoring Network
 - Groundwater Elevations, including water level contour maps and updated hydrographs (Task 1.1)
 - Change in Groundwater in Storage (Task 1.5)
 - Groundwater levels relative to sustainable management criteria

- Water Supply and Demand (Tasks 1.2, 1.3, and 1.4)
- Progress Towards Basin Sustainability
- Summary, Conclusions, and Recommendations
- Appendices

Deliverables include the following:

- Draft report for public and Board review
- Final report on the DWR portal

Task 3 – Meetings

GSI has budgeted for the following meetings: GSA staff meetings (4), and one Board meeting to present data and results.

Fee Proposal

Table 1 presents a task-by-task breakdown of GSI's proposed budget for all required services.

Description	Labor Hours	Labor Cost	Direct Expenses	Total
Task 1 – Data Analysis and Representation	100	\$22,050	\$0	\$22,050
Task 2 – Report Preparation	120	\$23,667	\$0	\$23,667
Task 3 – Project Management and Meetings	16	\$3,906	\$335	\$4,241
Project Totals	236	\$49,623	\$335	\$49,958

This work will be completed on a time and materials basis in accordance with our existing contract with the GSA. The total project budget will not be exceeded without your prior approval.

Schedule

Meeting your schedule is a top priority for GSI. Although tight, GSI is committed to provide a draft report for review by the first week of March, and upload of the final report by April 1, 2024, as required under SGMA.

We have enjoyed working with you and the GSA over the past couple of years and appreciate the opportunity to prepare the annual report. Please call any time if you have any questions regarding this proposal.

Sincerely,

GSI Water Solutions, Inc.



Dave O'Rourke, PG, CHG, PE
Project Manager