

**DRAFT**  
**Chapter 10**

**180/400-Foot Aquifer Subbasin**  
**Groundwater Sustainability Plan**

*Prepared for:*

**SVBGSA**

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## 10 GROUNDWATER SUSTAINABILITY PLAN IMPLEMENTATION

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This chapter describes how the GSP for the 180/400-Foot Aquifer Subbasin will be implemented. The chapter serves as a roadmap for addressing all of the activities needed for GSP implementation between 2020 and 2040, but focuses on the activities between 2020 and 2025.

Implementing this GSP will require the following formative activities, each of which is detailed in a subsequent subsection:

- Monitoring and reporting groundwater data
- Refining and implementing the groundwater charges framework
- Addressing identified data gaps
- Expanding and improving the existing monitoring networks
- Updating the data management system
- Reviewing and implementing the new upcoming USGS model for the Salinas Valley
- Refining and implementing projects and management actions

The implementation plan in this chapter is based on our current understanding of Subbasin conditions and our current assessment of the projects and management actions described in Chapter 9. Our understanding of the Subbasin's conditions and the details of the projects and actions will evolve over time based on future data collection, model development, and input from Subbasin stakeholders.

### 10.1 Implementation Activity 1: Monitoring, Reporting, and Outreach

Primary functions of this GSP's implementation during the first few years include the monitoring, evaluating, and reporting of sustainability conditions. The SVBGSA will hire consultant(s), negotiate agreements with agencies, and/or hire staff to implement the monitoring and reporting functions.

#### 10.1.1 Monitoring

Monitoring of the six sustainability criteria will be initiated immediately upon adoption of the GSP. Most monitoring relies on existing monitoring programs, and therefore there is no need to immediately initiate new monitoring systems. The SVBGSA will direct the monitoring programs outlined in Chapter 7 to track Subbasin conditions related to the six applicable sustainability indicators. Data from the monitoring programs will be routinely evaluated to ensure progress is being made toward sustainability or to identify whether undesirable results

are occurring. Data will be maintained in the Data Management System. Data from the monitoring program will be used by the SVBGSA to guide decisions on projects and management actions and to prepare annual reports to Subbasin stakeholders and DWR.

#### **10.1.1.1 Groundwater Elevation Monitoring**

Groundwater elevation monitoring data are being collected by MCWRA under the statewide CASGEM program. The CASGEM system will be replaced by the SGMA groundwater elevation monitoring program after GSP submission. Groundwater monitoring will continue to be conducted by MCWRA, and SVBGSA will conduct mid-year tracking of the data collection and annually download the data, prepare summary tables and figures, and compare the data to sustainability goals.

#### **10.1.1.2 Groundwater Storage Monitoring**

Groundwater pumping data are currently collected by MCWRA. This program will likely be expanded, as detailed in Section 10.4.2. SVBGSA will annually download MCWRA's groundwater pumping data, prepare summary tables and figures, and compare the data to sustainability goals.

#### **10.1.1.3 Seawater Intrusion Monitoring**

Seawater intrusion data are currently collected by MCWRA. This program will likely be expanded, as detailed in Section 10.4.3. SVBGSA will annually download MCWRA's seawater intrusion data and maps, and compare the data and maps to sustainability goals.

#### **10.1.1.4 Groundwater Quality Monitoring**

Groundwater quality monitoring data collection will be tracked and reviewed mid-year, and will be compiled annually, analyzed, managed, and presented in the following ways:

- Download from public databases
- Check and verify data then upload data to the Data Management System
- Prepare data summary tables and figures
- Compare data to Sustainable Management Criteria at RMS
- Analyze impacts of projects and actions

Monitoring results will be included in the annual reports to DWR, as well as summarized for trends in the 5-year GSP Update report.

#### 10.1.1.5 Land Subsidence Monitoring

SVBGSA will use InSAR data provided by DWR to assess land subsidence. InSAR data will be managed in the following way:

- InSAR data will be downloaded from the DWR website annually
- InSAR data will be checked and verified for completeness and reasonableness
- Data will be used to develop annual subsidence maps, similar to maps shown in Chapter 5
- The annual subsidence maps will be compared to sustainable management criteria

#### 10.1.1.6 Interconnected Surface Water Monitoring

Adequate monitoring sites for interconnected surface water monitoring was identified as a data gap in Chapter 7. The monitoring network for interconnected surface water monitoring will be enhanced, as described in Section 10.4.6. The enhanced monitoring network will be incorporated into MCWRA's existing monitoring system, which will replace the CASGEM system after GSP submission. After the enhanced monitoring network is established, SVBGSA will annually download the interconnected surface water data from the CASGEM system, prepare summary tables and figures, and compare the data to sustainability goals.

#### 10.1.2 Reporting

SGMA regulations require that the reports comply with DWR forms and submittal requirements that will be published by DWR, and that all transmittals are signed by an authorized party. Data will be organized and made available to the public to document Subbasin conditions relative to Sustainability Management Criteria (Chapter 8). At a minimum, the following reports will be prepared.

- **Annual Reports.** In accordance with SGMA Regulation §356.2, annual reports will be submitted to DWR starting on April 1, 2020. The purpose of the report is to provide monitoring and total groundwater use data to DWR, compare monitoring data to the sustainable management criteria, and adaptively manage actions and projects implemented to achieve sustainability. Annual reports will be available to Subbasin stakeholders.
- **Five-Year GSP Assessment Reports.** Five-year GSP assessment reports will be provided to DWR starting in 2025. The SVBGSA shall evaluate the GSP at least every five years to assess whether it is achieving the sustainability goal in the Subbasin. The assessment will include a description of significant new information that has been

made available since GSP adoption or amendment and whether the new information or understanding warrants changes to any aspect of the plan.

- **GSP Periodic Evaluations and Amendment.** Although not required by SGMA regulations, the SVBGSA anticipates that an amendment to the GSP will be prepared within the first five years. Updates may include incorporating additional monitoring data, updating the sustainable management criteria, documenting any projects that are being implemented and facilitating adaptive management of management actions. In addition, when the new Salinas Valley model is publicly available from the USGS, the water budgets will be updated to revise Chapter 6. Along with GSP amendments, the Data Management System will be routinely updated to include new information gathered from monitoring networks and included in annual and five-year update reports.

### **10.1.3 Communication and Outreach**

The SVBGSA will routinely provide information to the public about GSP implementation and progress towards sustainability and the need to use groundwater efficiently. The SVBGSA website will be maintained as a communication tool for posting data, reports and meeting information. This website features a link to an interactive mapping function for viewing Salinas Valley Groundwater Basin-wide data that were used during GSP development.

## **10.2 Implementation Activity 2: Refine and Implement Water Charges Framework**

The water charges framework outlined in Chapter 9 is one funding mechanism for long-term GSP implementation. Many details of the water charges framework will be developed during the first three years of implementation; depending on the outcome of the negotiations, long-term GSP implementation may be funded by the water charges framework, other financing method as permitted by SGMA and other state law, or a combination thereof. The SVBGSA previously implemented a Groundwater Sustainability Fee as a regulatory fee pursuant to Water Code section 10730. Because a GSP is a regulatory program, a regulatory fee could be used for implementation. In addition to the water charges framework, which implements an extraction charge pursuant to Water Code section 10730.2, the SVBGSA could use benefit assessments and special taxes, or any combination, subject to the requirements of state law.

The structure of the water charges framework, or other financing method, will be implemented in each of the six Salinas Valley Subbasins, although the details will be unique to each subbasin.

Details of the GSP implementing finance framework for all six subbasins will be developed during the first three years of this GSP's implementation through a facilitated, Valley-wide process. This process will be similar to the successful facilitated process that resulted in the SVBGSA serving as the GSA for some or all parts of all six subbasins. The result of this facilitated process will be an agreement on the financing method approved by the SVBGSA. The facilitation will be complete by January 31, 2023, and the financing method will be implemented in all six subbasins immediately following.

To bridge the gap between GSP submission and implementing the GSP implementation financing framework, an interim base fee will be charged as an extension to the current regulatory fee. This fee may be adjusted periodically to cover the cost of initial GSP implementation.

### 10.3 Implementation Activity 3: Address Identified Data Gaps

Chapter 4 identified a few key data gaps related to the hydrogeologic conceptual model characterization, including data gaps related to:

- **Aquifer properties.** The values and distribution of aquifer properties in the Subbasin have not been well characterized and documented. There are very few measured aquifer parameters in the overall Salinas Valley Groundwater Basin.
- **Hydrostratigraphy of the Deep Aquifers.** Vertical and horizontal extents, and potential recharge areas of the Deep Aquifers are poorly known. Hydrographs are not available for wells completed in the Deep Aquifers.

These key data gaps will be addressed early during implementation through the following programs.

- **Aquifer properties assessment.** To develop better estimates of aquifer properties, the SVBGSA will identify up to three wells in the 180-Foot Aquifer and up to three wells in the 400-Foot aquifer for aquifer testing. Each well test will last a minimum of 8 hours, and will be followed by a 4-hour monitored recovery period. Wells for testing will be identified using the following criteria.
  - Wells are owned by willing well owners
  - Wells have known well completion information
  - Wellheads are completed such that water elevations in wells can be monitored with data loggers
  - Wells are equipped with accurate flow meters

- Wells have area for discharge of test water
- Preferred wells will have nearby wells that can be monitored during the test
- **Deep Aquifers investigation.** To address the hydrostratigraphy of the Deep Aquifers, on April 24, 2018, the Monterey Board of Supervisors directed MCWRA to conduct a comprehensive investigation of the Deep Aquifers of the Salinas Valley. The SVBGSA will adopt the findings of this investigation into its updated hydrologic conceptual model.

Results of the aquifer properties assessment and the Deep Aquifers investigation will be incorporated into the required GSP 5-year update.

## **10.4 Implementation Activity 4: Expand Existing Monitoring Networks**

As noted in Chapter 7, the monitoring networks leverage existing monitoring programs. This section identifies the plan for expanding and enhancing each monitoring network.

### **10.4.1 Groundwater Level Monitoring Network**

Currently, the groundwater elevation monitoring network comprises the CASGEM wells monitored by MCWRA. Specific gaps in the groundwater level monitoring network were identified in Chapter 7, including insufficient coverage of wells along the boundaries of the Subbasin and near the Salinas River, and a lack of monitoring data from wells in the Deep Aquifers.

The general plan for adding monitoring to the monitoring network will be to first incorporate existing wells if possible. The SVBGSA will use MCWRA's existing well database to identify potential candidate wells in each data gap area. Well owners will be contacted to assess if they are willing to incorporate their wells into the groundwater elevation monitoring network. All candidate existing wells for incorporation into the monitoring network will be inspected to ensure they are adequate for monitoring and to determine depth, perforated intervals, and aquifer designation. Access agreements will be secured with well owners to ensure that data can be reported from the wells.

If an existing well cannot be identified, or permission to use data from an existing well cannot be secured to fill a data gap, then a new monitoring well will be drilled and added to the monitoring network. The SVBGSA will obtain required permits and access agreements before drilling new wells. The SVBGSA will retain the services of licensed geologists or engineers and qualified drilling companies for drilling new wells. The SVBGSA will evaluate the availability of grant funds and technical assistance support services through DWR or other

entities for new wells. Once drilled, the new wells will be tested as necessary and equipped with dedicated data loggers for monitoring.

All new monitoring wells identified as RMS locations will be added to the CASGEM network, to be monitored by MCWRA for continuity and consistency in data collection.

#### **10.4.2 Groundwater Storage Monitoring Network**

The SVBGSA will work with MCWRA to expand the existing well metering system currently in place to collect additional groundwater pumping information. The groundwater pumping information will be used to report on the groundwater storage SMC, as described in Chapter 8. General improvements to the existing MCWRA groundwater extraction reporting system may include some subset of the following:

- Expanding reporting requirements to all areas of the Salinas Valley
- Including all wells with a 2-inch discharge or greater
- Requiring automatically reporting flow meters
- Comparing flow meter data to remote sensing data to identify potential errors and irrigation inefficiencies

#### **10.4.3 Seawater Intrusion Monitoring Network**

MCWRA monitors seawater intrusion in coastal wells by measuring chloride concentrations and developing chloride isocontour maps that define the extent of seawater intrusion as the inferred location of the 500 mg/L chloride concentration. MCWRA publishes estimates of the extent of seawater intrusion every two years. However, those maps are based in part on confidential information obtained from private wells. The seawater intrusion monitoring network will include only wells where the data can be made publicly available.

As discussed in Chapter 7, the network of wells with publicly available data for monitoring chloride concentrations includes an adequate number and distribution of wells in the 180-Foot and the 400-Foot Aquifers. However, the distribution of wells in the Deep Aquifers is inadequate and considered a data gap. As described in Section 7.2, additional wells will be identified in the Deep Aquifers for water level monitoring. The data gap for seawater intrusion monitoring in the Deep Aquifers will be addressed by using the same set of new monitoring wells identified in the water level monitoring network.

#### **10.4.4 Water Quality Monitoring Network**

Groundwater quality monitoring will be performed using existing monitoring networks and programs. As described in Chapters 7 and 8, three water quality networks are included for the GSP monitoring program:

- Municipal public water supply wells reported to DDW
- Small public water systems wells reported to the County of Monterey
- Agricultural and domestic supply wells monitored under the Irrigated Land Regulatory Program (ILRP).

There is currently adequate spatial coverage to assess impacts to beneficial uses and users.

As part of the GSP implementation, the SVBGSA will track and review the ILRP monitoring network for Ag Order 4.0 and also identify any new small public system water supply monitoring network wells to add to the current network.

#### **10.4.5 Land Subsidence Monitoring Network**

Land subsidence monitoring will be conducted by DWR using InSAR technology, and the data will be made available on the DWR SGMA Data Viewer, as described in Chapter 7. The SVBGSA will download the data from the SGMA Data Viewer and the data will be evaluated to verify they are adequate for determining whether subsidence is occurring and for inclusion in the monitoring network. No data gaps related to the land subsidence monitoring network were identified in Chapter 7.

#### **10.4.6 Interconnected Surface Water Monitoring Network**

As described in Chapter 5, the initial analysis identifying locations of interconnected surface water is based on best available data, but contains significant uncertainty. Additional data are needed to reduce uncertainty and refine the map of interconnected surface waters. The main source of these data will be the Salinas Valley-wide integrated groundwater and surface water model when it becomes available.

In the 180/400-Foot Aquifer Subbasin, areas with shallow water levels exist that may be connected to the surface water system. There is evidence that shallow sediments occur above the confined 180-Foot Aquifer that are connected to the surface water system. However, there is almost no groundwater pumping in this area and it is not identified as a defined aquifer.

The level of interconnection is unclear and therefore this is considered a data gap that needs to be resolved as described in Chapter 5. The SVBGSA will either identify existing shallow

wells adjacent to the Salinas River or install up to two new shallow wells along the Salinas River in the 180/400-Foot Aquifer Subbasin to establish the level of interconnection. If existing shallow wells are identified and deemed adequate based on an inspection, an agreement will be secured with the well owner to incorporate the well into the investigation and report data from the well. If existing wells cannot be identified or accessed, then SVBGSA may consider drilling new monitoring wells.

## **10.5 Implementation Activity 5: Update Data Management System**

As described in Chapter 7, the SVBGSA has developed a Data Management System (DMS) that is used to store, review, and upload data collected as part of the GSP development and implementation. A web application showing these data is available on the SVBGSA's website for stakeholders to view the data. As new information is collected during monitoring and provided by local stakeholders, the DMS will be updated. The regular updates will also coincide with the review of new data and development of annual reports.

## **10.6 Implementation Activity 6: Implement the USGS Groundwater Model**

As mentioned in various sections of this GSP, the USGS is currently working on revising and calibrating a Salinas Valley-wide Integrated Hydrologic Model (SVIHM). The fully calibrated historical SVIHM was not available for use during this GSP development. A preliminary operational version of the model was available to use with climate change inputs to develop an initial projected water budget.

The model is expected to be released within one year and will be fully available for developing the remaining five Salinas Valley subbasin GSPs. During implementation of the 180/400-Foot Aquifer Subbasin, the SVIHM will be used for the following tasks:

- Revisit the historical, current and projected water budgets.
- Update the estimated sustainable yield of the Subbasin, as needed.
- Develop numerical minimum thresholds for the depletions of interconnected surface water. As soon as the model is available, current flow depletions will be computed and set as the minimum threshold not to be exceeded during implementation of the GSP.
- More rigorously evaluate benefits of proposed management actions and priority projects.

Results of these modeling tasks will be included in an addendum to the GSP or the 5-year GSP update.

## **10.7 Implementation Activity 7: Refine and Implement Management Actions and Projects**

The projects and management actions identified in Chapter 9 are sufficient for attaining sustainability in the 180/400-Foot Aquifer Subbasin as well as the other five subbasins in the Salinas Valley. The projects and actions will be implemented in a coordinated fashion across the entire Salinas Valley to ensure Valley-wide sustainability. Because five of the subbasins in the Valley will not complete GSPs until January 31, 2022, many of the projects and actions will be implemented only after this time. Therefore, the initial activities for project implementation will include refining the projects and actions identified in Chapter 9. Activities during the first three years of implementation that will be undertaken before January 31, 2023 include:

- Clarifying water rights for recharge opportunities
- Applying for change of diversion or change of timing on water rights as necessary
- Refining yields of proposed projects
- Refining costs of proposed projects based on the ability to modify water rights, as discussed above, and the expected yield of the projects.
- Producing preliminary design of projects if projects are adequately defined
- Initiating environmental permitting for projects as necessary

An additional benefit of refining the projects during the first three years of implementation is that this approach complements the approach for refining the water charges framework, as outlined in Section 10.2. Refinement of the projects and actions will occur simultaneously with refinement of the funding mechanism that supports the projects and actions. By refining all of these plans simultaneously, the funding mechanism and the projects will all be in place by June 30, 2023. Projects and management actions will then be immediately implemented in a coordinated fashion across the entire Salinas Valley.

## **10.8 Short-Term Implementation Start-Up Budget**

Table 10-1 and Table 10-2 summarize the conceptual planning-level costs for the initial five years of GSP implementation. Because this GSP is being developed in coordination with other GSPs in the Salinas Valley, the initial implementation costs are divided into costs that directly benefit the 180/400-Foot Aquifer Subbasin and costs that benefit all Salinas Valley Subbasins. These costs do not include costs of project development or implementation. These costs are independent of fees currently collected by MCWRA; no fees will be collected by SVBGSA that duplicate fees already being collected by MCWRA.

The Subbasin specific costs, shown on Table 10-1, include public outreach; supplemental hydrogeologic investigations to address data gaps; improvements to the monitoring networks, including installation of up to six new monitor wells; and annual monitoring and reporting of sustainability conditions. The Valley-wide costs, shown on Table 10-2, include routine administrative operations, negotiating funding mechanisms, implementing the SVIHM model, and early planning efforts. The Valley-wide costs include the already implemented \$1,200,000 per year administrative costs agreed to by the SVBGSA. These costs include an estimated \$2,000,000 for environmental permitting should it be necessary in the first five years of implementation. These are initial estimate costs, and will likely change as more data become available.

Table 10-1: 180/400-Foot Aquifer Subbasin Specific Estimated Planning-Level Costs for First Five Years of Implementation

Activity	Estimated Cost	Cost Unit	Assumptions
Monitoring and Reporting			
Monitoring GW Levels	\$ 12,000	Annual	Data download, data checking, costs may reduce in subsequent years after a defined process in place
Monitoring GW Extractions	\$ 8,000	Annual	Data download, data checking, costs may reduce in subsequent years after a defined process in place
Monitoring GW Quality	\$ 16,000	Annual	Data download, data checking, costs may reduce in subsequent years after a defined process in place
Monitoring Subsidence	\$ 5,000	Annual	Data download, data checking, costs may reduce in subsequent years after a defined process in place
Monitoring Seawater Intrusion	\$ 5,000	Annual	Data download, data checking, costs may reduce in subsequent years after a defined process in place
Monitoring Stream Depletion	\$ 8,200	Annual	Data download, data checking, costs may reduce in subsequent years after a defined process in place
Annual Reporting	\$ 22,000	Annual	\$30,000 for first one, subsequent ones at \$20,000 each
2-Year Update Report	\$ 100,000	Lump Sum	This only applies to the 180/400-Foot Subbasin GSP to refine the current version of the Plan
5-Year Update Report	\$ 150,000	Lump Sum	
Technical Communication and Outreach	\$ 20,000	Annual	Tasks related to ongoing communication and outreach
Address Identified Data Gaps			
Aquifer tests	\$ 160,500	Lump sum	Based on assumed general aquifer testing procedures
Expand Existing Monitoring Networks			
Identify new GW Elevation wells	\$ 40,000	Lump Sum	Five-week effort
Install up to two new 180-Foot monitoring wells	\$ 242,000	Lump Sum	No land purchase, 1 week permitting, 2 weeks design, bids average \$100,000 per well
Install up to two new 400-Foot monitoring wells	\$ 282,000	Lump Sum	No land purchase, 1 week permitting, 2 weeks design, bids average \$120,000 per well
Install two shallow wells near Salinas River	\$ 78,000	Lump Sum	No land purchase, 1 week permitting, 1-week design, bids of \$25,000 per well
<b>Total</b>	<b>\$ 1,533,500</b>		
<b>Average Annual Cost for Five Years</b>	<b>\$ 306,700</b>		

Table 10-2: Valley-Wide Estimated Planning-Level Costs for First Five Years of Implementation

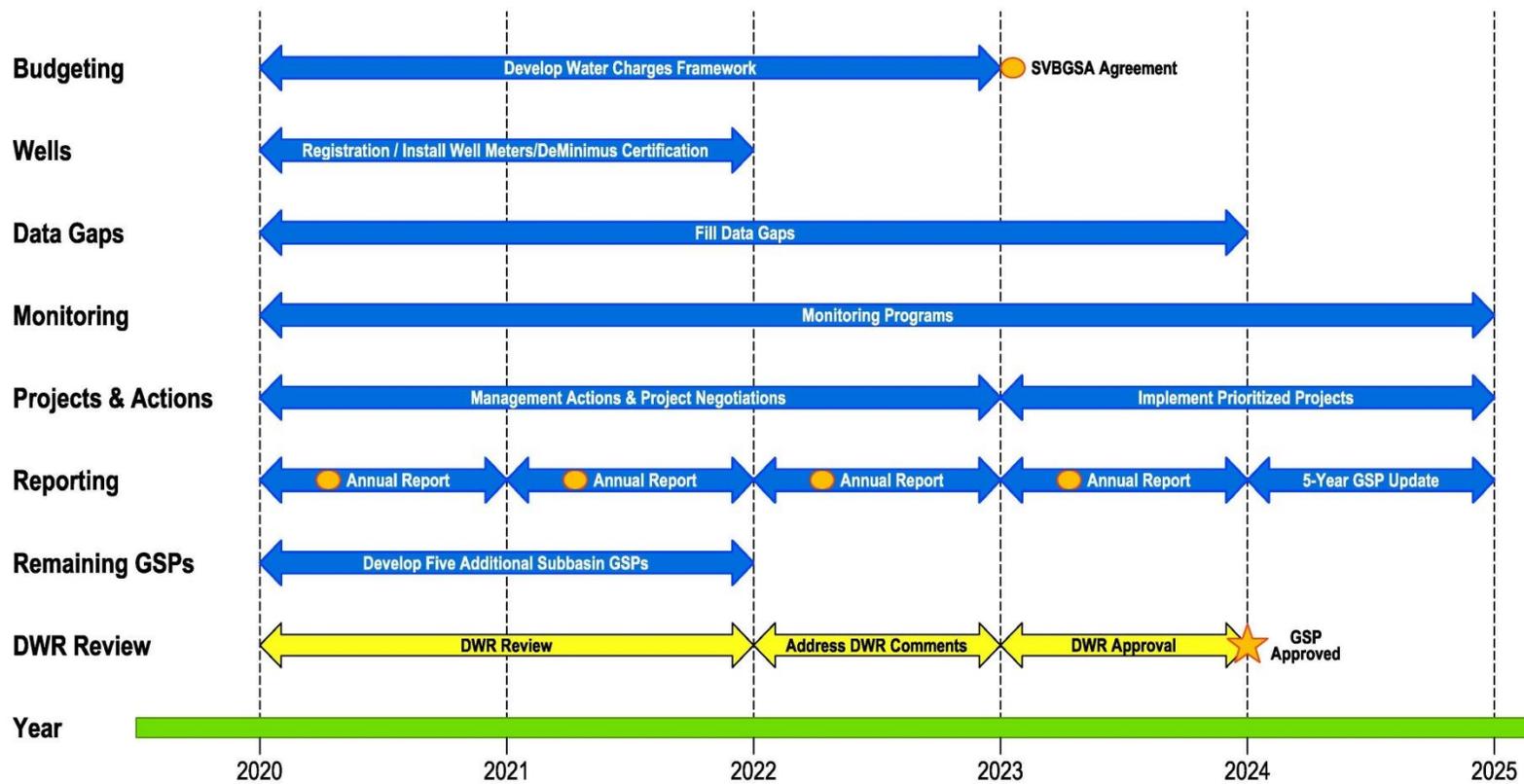
Activity	Estimated Cost	Cost Unit	Assumptions
Operational costs including cost of General Manager, staff, etc. (based on 2019 fee study)	\$ 1,200,000	Annual	2019 Fee Study
Monitoring and Reporting			
Refine Water Charges Framework	\$ 630,000	Lump Sum	Facilitator = 3 years x \$150,000 per year. Technical = 3 years x \$60,000 per year
Expand Existing Monitoring Networks			
Negotiate expansion of MCWRA GEMS	\$ 36,000	Lump Sum	Assuming MCWRA continues to implement and oversee the GEMS pumping database; assist them with developing detailed requirements for local pumpers
Implement monitoring data from Ag Order 4.0	\$ 33,000	Lump Sum	Review the new Ag Order 4.0 monitoring well network and evaluate which wells to include within the GSP monitoring network
Update DMS	\$ 15,200	Annual	Add newly collected data to DMS
Implement SVIHM Model	\$ 327,600	Lump Sum	6 wks model review, 4 wks water budget extraction, 8 wks projects modeling, 6 wks modeling in each of 4 subsequent yrs
Refine Projects and Actions	\$ 460,000	Annual	\$2,000,000 for CEQA
<b>Total</b>	<b>\$ 9,402,600</b>		
<b>Average Annual Cost for Five Years</b>	<b>\$ 1,880,520</b>		

## 10.9 Implementation Schedule

The SVBGSA oversees all or part of six subbasins in the Salinas Valley. Implementing the 180/400-Foot Aquifer Subbasin GSP must be integrated with the implementation of the five other GSPs in the Salinas Valley. None of the other five subbasins in the Salinas Valley are critically overdrafted, and will only submit GSPs in January 2022. The implementation schedule reflects the significant integration and coordination needed to implement all six GSPs in a unified manner.

The general implementation schedule refines details of the water charges framework, the sustainability projects, and the management actions during the first three years of implementation. These refinements will be developed as the five other GSPs in the Salinas Valley are produced. The refined water charges framework, projects, and management actions will then be implemented Valley wide approximately one-year after all six GSPs are complete. This will ensure the 180/400-Foot Aquifer Subbasin GSP is implemented in coordination with the other Valley subbasins, while at the same time not waiting for the other GSPs to be complete before negotiating many of the implementation details.

A general schedule showing the major tasks and estimated timeline during the first five years of GSP implementation is provided in Figure 10-1.



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Figure 10-1: General Schedule of 5-Year Start-Up Plan

## 10.10 References

California Department of Water Resources, 2017. *Sustainable Management Criteria Best Management Practices*. <https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/BMP-6-Sustainable-Management-Criteria-DRAFT.pdf>