

GSA

- 1. Sustainable management criteria for the chronic lowering of groundwater levels (RB,LM,Ant,C)**
 - How will dry wells be tracked? Process for public to report dry well. Provide public records of reported dry wells in annual and periodic evals
 - Provide the criteria used to select tessellation polygons for its selection of undesirable results.353 The GSA should also provide an explanation for how each tessellation polygon is representative of beneficial uses and users in the area, specifically how many wells are located within each tessellation hexagon.
 - Provide criteria and process of how focus area was chosen to establish min thresholds. Should consider the potential effects on beneficial uses and users. Explanation of why some reported dry wells are not included in focus areas.
- 2. Establish date for when demand management program will be implemented. Provide info that ensures GSA implements are feasible and will not create undesirable results. Report effectiveness and progress of management program in annual and periodic report (RB ONLY)**
- 3. Hydrogeologic Conceptual Model (RB,LM,ANT)**
 - Identify 2 aquifers, identify how interconnected they are, and how managing them separate improves sustainability
 - Steps to fill data before next eval (with a focus on the lack of understanding of the Lower Aquifer, including its formation thicknesses, defining hydraulic properties, and interconnectivity with the Upper Aquifer)
- 4. Update water budget. Specific consideration of the effect of RB Arch on flows to RB Subbasin to bowman subbasin (RB ONLY)**
- 5. Sustainable management criteria for degraded water quality (RB,LM,Ant,C)**
 - Revise to include undesirable results
 - Revise description so that ground water conditions are considered in the assessment of subbasin
 - Coordinate with all water entities to develop process for monitoring if management and extraction is causing degraded water quality in subbasin

6. Sustainable management criteria for land subsidence (RB,LM,Ant)

- Evaluate InSAR data
- Impacts to beneficial use of groundwater. Quantify min threshold that represent an undesirable result
- Set an annual rate and cumulative total amount of subsidence that will lead to undesirable results

7. Sustainably manage depletions of interconnected surface water (RB,LM,Ant)

- Estimate the quantity and timing of depletions of interconnected surface water systems

8. Related to the monitoring networks (RB,LM,Ant)

- Monitor subbasin to quantify water budget
- Expand the degraded water quality monitoring network's spatial extent for the lower principal aquifer
- Update the land subsidence monitoring network

Bowman ONLY

- 1. Explain the inconsistency between the depicted west-east groundwater flow direction based on groundwater elevation contours and the north-south flow direction based on the water budgets. Explain why significant subsurface flow**
- 2. Revise the sustainable management criteria for groundwater levels**
 - Refine the description of undesirable results to describe the significant and unreasonable conditions GSA is managing the subbasin to avoid
 - Department staff recommend the minimum thresholds be revised to be consistent with the GSP Regulations. Specifically quantify the number of wells (ALL)
 - Demonstrate that the minimum thresholds for groundwater levels will not interfere with other sustainability indicators causing undesirable results.
- 3. Revise the definition of undesirable results of groundwater quality**
- 4. Identify critical infrastructure. Expand the land subsidence monitoring**
- 5. Utilizing the interconnected surface water guidance issued by the Department to evaluate the rate, timing, and volume of depletions of interconnected surface water caused by groundwater extractions. Establish sustainable management criteria and management**

Corning ONLY

1. Address the following:

- Provide updates in annual reports and future periodic evaluations of overdraft estimates, actual benefits from all projects, and groundwater conditions in the Subbasin
- Develop triggers for when the different components of the phased approach of the demand management program will be implemented

2. Set an annual rate and cumulative total amount of subsidence that will lead to undesirable results. Establish min thresholds and undesirable results definitions for land subsidence that consider impacts to beneficial uses and users of groundwater, land uses, and property interests

3. Address the following

- Estimate the quantity and timing of depletions of interconnected surface water systems
- Revise sustainable management criteria with the removal of the exemption for undesirable results in unanticipated future droughts and unanticipated climatic conditions
- Consider utilizing the interconnected surface water guidance to establish quantifiable minimum thresholds, measurable objectives, and management actions
- Fill data gaps, collect additional monitoring data, and implement the current strategy to manage depletions of interconnected surface water and define segments of interconnectivity and timing
- collaborate with local, state, and federal regulatory agencies as well as interested parties to better understand the full suite of beneficial uses and users that may be impacted by pumping induced surface water depletion within the GSAs' jurisdictional area

4. Fill data gaps in the groundwater level monitoring network such as well construction information and spatial gaps near Thames Creek