

MODESTO SUBBASIN COMMUNICATION AND ENGAGEMENT PLAN

PREPARED FOR:

Stanislaus and Tuolumne Rivers Groundwater Basin Association Groundwater Sustainability Agency and the Tuolumne County Groundwater Sustainability Agency

PREPARED BY:

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Executive Summary

The Modesto Subbasin Communication and Engagement Plan (Plan) provides a high-level overview of potential near- and long-term outreach strategies, tactics, and tools that support public and stakeholder communication actions, as required by the Sustainable Groundwater Management Act (SGMA) of 2014 and for consideration by the Stanislaus and Tuolumne Rivers Groundwater Basin Association Groundwater Sustainability Agency (STRGBA GSA). This Plan recognizes that one-size doesn't fit all and describes potential actions that may be implemented by the STRGBA GSA and Tuolumne County Groundwater Sustainability Agency (Tuolumne County GSA) to inform and engage stakeholders about development of the Groundwater Sustainability Plan (GSP), deliver clear and consistent messaging about SGMA, and comply with the SGMA outreach requirements. The potential outreach tools and activities identified in this document were informed by a Stakeholder Assessment conducted by the Modesto Subbasin GSAs in Spring 2020. Both the Stakeholder Assessment and this Plan were funded through a Facilitation Support Services grant (Implementation Service Plan no. 08, see Attachment A) from the California Department of Water Resources (DWR). Stantec developed these documents as part of the Implementation Service Plan tasks for the Modesto Subbasin.

Outreach Tools

This Plan identifies several potential tools to support communication and engagement activities with stakeholders in the Modesto Subbasin. For the purposes of this Plan, stakeholders are defined as beneficial users of groundwater in the Subbasin or individuals or organizations with interest or stake in the management of water resources in the region. These tools include the following:

- Project Website: The STRGBA GSA member agencies have updated the STRGBA website (www.strgba.org) to provide information about SGMA and to house GSA meeting and outreach materials. The Tuolumne County GSA has added a SGMA-related page (https://www.tuolumnecounty.ca.gov/1292/Sustainable-Groundwater-Management-Act-S) to the Tuolumne County website. The page also links to the STRGBA website.
- Interested Parties Database: Pursuant to the requirements of SGMA, the Modesto Subbasin GSAs have developed and will maintain an Interested Party Database. The Database will be used to notify stakeholders of pending meetings and workshops, opportunities for public comment, and notices of other GSA outreach actions.
- Newsletter: The STRGBA GSA has developed and distributes a quarterly electronic newsletter to keep interested parties informed about progress in developing the GSP, opportunities for public engagement, and groundwater management issues or news of regional importance.
- Informational Materials: The Modesto Subbasin GSA will develop template outreach
 materials for each phase of the GSP development and implementation process. These
 materials may be translated as needed into Spanish or other languages, and may
 include informational fact sheets, template presentation slides, notices, and new
 releases.

Executive Summary

Outreach Activities

This Plan identifies a variety of potential outreach activities to provide opportunities for interested parties and stakeholders to stay informed and engaged in the development of the GSP. These potential outreach activities seek to build and expand public awareness of the Modesto Subbasin GSAs and SGMA and to actively engage key stakeholder groups to coordinate and collaborate on technical issues important for GSP development. Below is a summary of existing and potential additional outreach opportunities.

- Public Meetings: The primary way for members of the public to provide input on development of the GSP is by attending and providing public comment at regular STRGBA GSA GSP Coordination and Technical Advisory Committee meetings.
- Member Agency Briefings: GSA representatives or consultant staff may conduct periodic presentations to boards, councils, and commissions of the Modesto Subbasin GSAs' member agencies on an as-needed basis. These presentations are intended to provide updates on GSP progress and next steps and to respond to questions.
- GSP Development Workshops: In support of plan development, the Modesto Subbasin GSAs will periodically host public workshops aimed at educating members of the public about key GSP topics and to solicit input on technical content and draft GSP chapters. It is anticipated that up to five workshops will be held between Summer 2020 and Fall 2021.
- Community Presentations: The Modesto Subbasin GSAs may provide brief, high-level overviews of the GSP process and status at meetings hosted by various civic, nonprofit, and community groups in the Subbasin.
- GSP Office Hours: GSP office hours entail establishing a designated block of time when
 interested parties can talk to a GSA representative, ask questions, or provide input on
 draft GSP chapters in an informal setting. The GSA representative(s) hosting the office
 hours will record questions and feedback from participants. Questions and answers will
 be posted on the STRGBA GSA website..
- Partnerships with Trusted Messengers: The Modesto Subbasin GSAs may utilize
 partnerships with trusted messengers in the Subbasin to broaden the dissemination of
 SGMA information and connect with hard-to-reach stakeholder groups. This may include
 sending these organizations notices and informational materials for distribution to their
 stakeholders, cohosting events or workshops, and/or holding briefings with organization
 leadership.
- Targeted Outreach: The Modesto Subbasin GSAs may also conduct targeted outreach
 to specific stakeholder groups that may be underrepresented in other outreach activities
 or require targeted messaging or activities. This may include targeted outreach to tribes,
 agricultural water users, urban water users, disadvantaged communities, and watershed
 stewardship organizations.

Groundwater Sustainability Plan Comment Process Adoption Outreach

The Modesto Subbasin GSAs will release draft GSP chapters for public review and comment as chapters are developed. Interested parties will be able to view draft chapters on the STRGBA GSA website and to submit comments remotely via email or in-person during public workshops. The draft chapters may be revised according to comments received during the respective comment periods.

It is currently envisioned that a complete Public Draft GSP will be released for public review in Fall 2021, for a 45-day public comment period. A summary of the comments received during this period will be attached to the Final GSP and posted on the STRGBA GSA website. The Final GSP will be adopted at a public hearing and then submitted to DWR no later than January 31, 2022.



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Acronyms and Abbreviations

CASGEM California Statewide Groundwater Elevation Monitoring

Plan Communication and Engagement Plan

DWR California Department of Water Resources

FSS Facilitation Support Services

GSA Groundwater Sustainability Agency

GSP Groundwater Sustainability Plan

MHI Median Household Income

MID Modesto Irrigation District

Modesto Subbasin GSAs Stanislaus and Tuolumne Rivers Groundwater Basin Association

Groundwater Sustainability Agency and Tuolumne County

Groundwater Sustainability Agency

MOU Memorandum of Understanding

SGMA Sustainable Groundwater Management Act of 2014

Stakeholder Assessment Modesto Subbasin Stakeholder Assessment

STRGBA GSA Stanislaus and Tuolumne Rivers Groundwater Basin Association

Groundwater Sustainability Agency

Subbasin Modesto Subbasin

Tuolumne County GSA Tuolumne County Groundwater Sustainability Agency



1.0 INTRODUCTION

1.1 About SGMA

The Sustainable Groundwater Management Act (SGMA) was signed into law by Governor Jerry Brown on September 16, 2014—three years after the start of California's historic drought. The legislation requires local public agencies and newly formed Groundwater Sustainability Agencies (GSA) in high- and medium-priority subbasins to meet certain requirements for the long-term sustainable management of California's groundwater resources. These requirements include the following:

- June 30, 2017: Establish GSAs (or equivalent) for all high- and medium-priority basins. (Water Code § 10724(b))
- July 1, 2017: County must affirm or disaffirm responsibility as GSA if no GSA has been established. (Water Code § 10724(b))
- Jan. 31, 2022: All non-critically overdrafted high- and medium-priority basins must be managed under a Groundwater Sustainability Plan (GSP). (Water Code § 10720.7(a)(1))
- On April 1, following GSP adoption and annually thereafter, GSAs will provide reports on progress towards sustainability to the California Department of Water Resources (DWR). (Water Code § 10728)

Oversight of these requirements is provided by DWR with potential intervention by the State Water Resources Control Board, if management activities are determined to be inadequate.

1.1.1 GSP Emergency Regulations

Following the passage of SGMA, DWR embarked on a series of public and agency meetings to develop the GSP Emergency Regulations. These regulations were released in July of 2016 and are chaptered under the California Code of Regulations Title 23. Waters (§350-§358.4). In conjunction with the release of these regulations, DWR published the Groundwater Sustainability Plan Emergency Regulations Guide. This guide summarizes and defines the processes and requirements for GSA formation found in Title 23, the development and implementation of GSPs, the responsibilities of DWR (and by extension the State Water Resources Control Board), and inter-basin coordination (§357.2).

The Modesto Subbasin Communication and Engagement Plan (Plan) describes options available to the Modesto Subbasin GSAs' as they seek to achieve the communication and engagement activities identified in the GSP Emergency Regulations and chaptered in California Code of Regulations Section 354.10:

Each plan shall include a summary of information relating to notification and communication by the agency with other agencies and interested parties including the following:

(a) A description of the beneficial uses and users of groundwater in the basin, including the land uses and property interests potentially affected by the use of

groundwater in the basin, the types of parties representing those interests, and the nature of consultation with those parties.

- (b) A list of public meetings at which the plan was discussed or considered by the agency.
- (c) Comments regarding the plan received by the agency and a summary of any responses by the agency.
- (d) A communication section of the plan that includes the following:
- (1) An explanation of the agency's decision-making process.
- (2) Identification of opportunities for public engagement and a discussion of how public input and response will be used.
- (3) A description of how the agency encourages the active involvement of diverse social, cultural and economic elements of the population within the basin.

1.2 About the Modesto Subbasin

There are a total of 515 groundwater subbasins in the State of California. The Modesto Subbasin (Subbasin) (DWR Bulletin 118 Basin Number 5-022.02) is primarily located within Stanislaus County with a portion in Tuolumne County. It is one of the 19 subbasins making up the greater San Joaquin Valley Basin. It is also one of the 94 subbasins that have been designated as high or medium priority by DWR's California Statewide Groundwater Elevation Monitoring (known as CASGEM) program. With CASGEM data and analysis, DWR has classified the Modesto Subbasin as a high-priority, non-critically overdrafted subbasin. This classification requires the GSAs in the Subbasin to submit a GSP to DWR no later than January 31, 2022.

1.3 About the Stanislaus and Tuolumne Rivers Groundwater Basin Association and Tuolumne County Groundwater Sustainability Agencies

The Stanislaus and Tuolumne Rivers Groundwater Basin Association Groundwater Sustainability Agency (STRGBA GSA) and the Tuolumne County Groundwater Sustainability Agency (Tuolumne County GSA) (collectively known herein as the Modesto Subbasin GSAs) have formed in response to the regulations set forth by SGMA. They are working cooperatively to develop a single GSP for the Modesto Subbasin, conduct general and targeted outreach communication and engagement activities, and to maintain groundwater sustainability in the Subbasin through the use of proven sustainable groundwater management actions.

STRGBA was formed under a Memorandum of Understanding (MOU) in April of 1994 to provide a forum for coordinated planning and management activities for the Modesto Subbasin. Initially, the MOU was between six entities in the Subbasin: City of Modesto, Modesto Irrigation District (MID), City of Oakdale, Oakdale Irrigation District (OID), City of Riverbank, and Stanislaus County. In 2015, the MOU was revised to add the City of Waterford. Each of these entities are eligible to serve as an independent GSA, pursuant to Water Code §10721(n). The STRGBA member agencies passed resolutions to amend the existing MOU to officially form the singular STRGBA GSA in compliance with SGMA on May 29, 2017.

Tuolumne County formed a GSA on May 16, 2017, to cover the portion of the Modesto Subbasin within the County's jurisdiction and not covered by an existing GSA. The Tuolumne County GSA represents an area of approximately 1,000 acres, primarily located in the northern part of the Subbasin. This area is a fraction of one percent of the 247,000-acre Subbasin. Therefore, the Tuolumne County GSA is cooperating in the Modesto Subbasin GSP process through a coordination agreement with Stanislaus County, included as **Attachment B** to this Plan. As a STRGBA GSA member agency, Stanislaus County is participating in the GSP process on behalf of the Tuolumne County GSA.

Figure 1 shows the boundaries of the Modesto Subbasin and illustrates how the Modesto Subbasin GSAs collectively cover the entirety of the Subbasin.

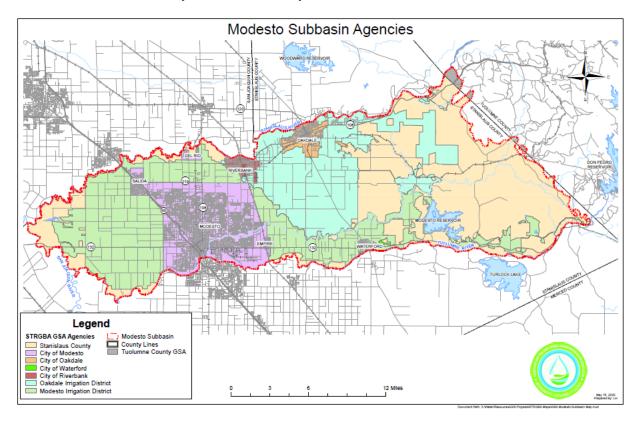


Figure 1. Map of the Modesto Subbasin Groundwater Sustainability Agencies

1.4 About the Plan

This Plan was developed by Stantec in coordination with the Modesto Subbasin GSAs, with funding provided by DWR's SGMA Facilitation Support Services (FSS) program. It provides a roadmap of potential communication and engagement activities that will support members of the Modesto Subbasin GSAs, as well as technical and other consultant staff, with GSP development, adoption, and implementation efforts. The purpose of the Plan is to provide options that may aid them as they work to: (1) meet the regulatory requirements of SGMA, (2) support the GSP development processes (technical, policy, and others, as applicable), and (3) accomplish the communication and engagement objectives specific to the members of the Modesto Subbasin GSAs.

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Every chapter of this Plan begins with the California Water Code or California Code of Regulations section(s) identifying the applicable requirements for public outreach and engagement under SGMA. Introduction of these requirements serve as a reminder of the regulatory and statutory requirements of SGMA, and they initiate content development for incorporation in the Modesto Subbasin GSP.

2.0 DECISION-MAKING PROCESS

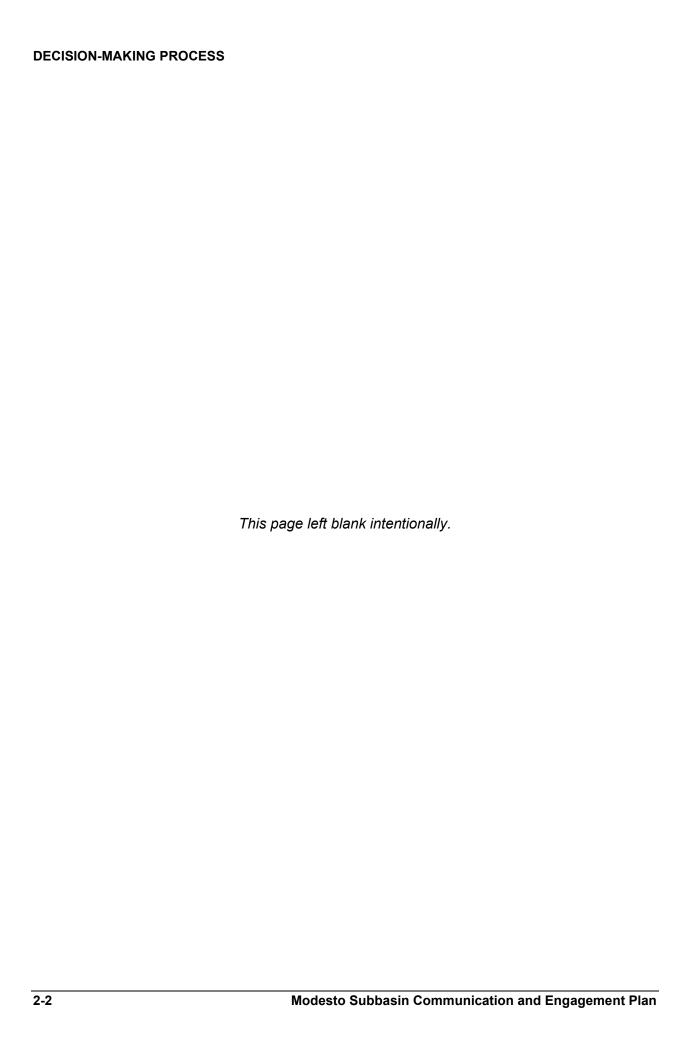
Legal Requirements:

§354.10 (d) A communication section of the Plan that includes the following:

1) An explanation of the Agency's decision-making process.

The STRGBA GSA has taken the responsibility for overseeing development of a GSP for the Modesto Subbasin, and it serves as the administrative body for public outreach and GSP implementation on behalf of the member agencies, consistent with the MOU and the coordination agreement with the Tuolumne County GSA. Working collectively, the Modesto Subbasin GSAs will agree on an outreach approach. They are coordinating on all Subbasin-wide outreach implementation efforts and activities. The Modesto Subbasin GSAs are also consulting and coordinating, both individually and collectively as a group, with community organizations and nonprofits to support or implement outreach efforts and activities.

Pursuant to the SGMA regulation §354.10 (d), the Modesto Subbasin GSP will include a description of the GSAs' decision-making process, which will include their governance structure. Consistent with the adopted MOU, administrative and plan-development activities of STRGBA GSA have been delegated to representatives of the member agencies by their locally elected officers. These representatives will be used to solicit input, plan public outreach activities, make key decisions, and to achieve adoption of the GSP.



3.0 BENEFICIAL USES AND USERS

Legal Requirements:

§354.10 Each plan shall include a summary of information relating to notification and communication by the Agency with other agencies and interested parties including the following:

(1) A description of the beneficial uses and users of groundwater in the basin, including the land uses and property interests potentially affected by the use of groundwater in the basin, the types of parties representing those interests, and the nature of consultation with those parties.

SGMA requires that each GSP include a description of beneficial uses and users of groundwater in the Subbasin, and to describe the nature of consultation with those parties. California Water Code §10723.2 identifies beneficial user types, including:

- Agricultural well owners
- Domestic well owners
- Municipal well operators
- Public water systems
- Local land-use planning agencies
- Environmental users of groundwater
- Surface water users
- Federal government
- California Native American tribes
- Disadvantaged communities (DAC)
- Groundwater elevation monitoring entities

As part of its initial GSA formation notification, the Modesto Subbasin GSAs provided a preliminary list of beneficial users within their jurisdiction and described potential actions to engage those users. These actions centered around leveraging existing relationships with stakeholders in the Subbasin. Stakeholders identified in the initial notification included:

- Agricultural water users, particularly small individual landowners that rely on groundwater for agriculture
- Domestic well owners
- Improvement districts and other special districts that own or maintain water infrastructure

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- Land-use planning agencies, including the Stanislaus Local Agency Formation Commission
- Riparian water users
- Environmental groups, including state and federal regulatory agencies
- Federal agencies, including the US Geologic Survey, US Fish and Wildlife Service, and US Army Corps and Engineers
- DACs

This Plan identifies recommended tools and activities to engage and consult each of these beneficial users in development of the GSP for the Subbasin. In some cases, these beneficial users will be consulted through the general public and stakeholder outreach activities identified in **Section 4.3**. In other cases, targeted outreach activities may be needed, and targeted stakeholder outreach activities are described in **Section 4.4**.

4.0 COMMUNICATION AND ENGAGEMENT

Legal Requirements:

§354.10 (d)

- (2) Identification of opportunities for public engagement and a discussion of how public input and response will be used.
- (3) A description of how the Agency encourages the active involvement of diverse social, cultural, and economic elements of population within the basin.
- (4) The method the Agency shall follow to inform the public about progress implementing the Plan, including the status of projects and actions.

Consistent with SGMA, the Modesto Subbasin GSAs intend to develop and implement their GSP in close coordination with the public and stakeholders through various outreach tools and activities. These notifications serve as the foundation for consistent and progressive engagement with diverse social, cultural, and economic stakeholder communities within the jurisdictional boundaries of the Subbasin.

Communication and engagement activities described in this section include tools, activities, and strategies tailored to the unique needs of the stakeholders within the Subbasin. These tools and activities have either already been initiated/completed, are currently in progress, or may be scheduled to be initiated/completed on an as-needed basis. They draw from results of the Modesto Subbasin Stakeholder Assessment, further described below, and are framed to establish and maintain stakeholders' awareness and understanding of SGMA, the Modesto Subbasin GSAs, and the GSP development process.

4.1 Stakeholder Assessment

The Modesto Subbasin Stakeholder Assessment (Stakeholder Assessment) was conducted by Stantec (outreach consultant) on behalf of the Modesto Subbasin GSAs. The purpose of the Stakeholder Assessment was to evaluate stakeholders' knowledge of SGMA and groundwater management practices in the Modesto Subbasin, and to establish goals and strategies for public outreach, communication, and engagement to achieve SGMA compliance. Stantec conducted the Stakeholder Assessment in two parts: an online stakeholder survey and a series of focus group interviews. This section describes each of these parts and summarizes the key Stakeholder Assessment findings.

4.1.1 Stakeholder Survey

The first part of the Stakeholder Assessment was an online stakeholder survey conducted by the STRGBA GSA to assess stakeholders' understanding and perspectives on key SGMA topics and groundwater conditions in the Subbasin. The STRGBA GSA sent out the survey in Spring 2019 and promoted it through its website and member agencies' email lists and websites. The survey was made available for more than one year. In total, 161 individuals took the survey. Of those 161 survey participants, 35 were agricultural water users and 73 were

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municipal water users. The remaining participants identified as private well users, government agency workers, non-government organizations, academia, or "other."

4.1.2 Focus Groups

The second part of the Stakeholder Assessment was a series of focus group interviews with stakeholders that were identified by the STRGBA GSA member agencies. The purpose of the focus groups was to gain deeper insights into preliminary findings from the survey and gather additional information on preferred methods for public outreach in the Subbasin. STRGBA GSA representatives identified 27 stakeholders as candidates to participate in the focus groups. Due to participants' scheduling constraints, Stantec ultimately conducted interviews with 15 stakeholders representing the following STRGBA GSA member agencies: City of Modesto, City of Riverbank, MID, OID, and Stanislaus County.

Stantec conducted five focus groups in April and March 2020. Each focus group was comprised of one to four stakeholders. Stakeholders were grouped by the STRGBA GSA member agency jurisdiction in which they work or reside. The STRGBA GSA representatives were invited, but not required, to attend the focus group for their agency to act as a listener. The interviews were originally intended to be conducted in-person; however, due to shelter-in-place orders and other directives in response to COVID-19, all interviews were conducted via conference call.

Prior to each interview, the focus group participants were required to fill out a pre-meeting questionnaire and take the online stakeholder survey. Stantec compared the survey results from each interview participant to that of the other interviewees in their group, as well as to those of other survey participants. The results of this analysis were a key discussion topic during the focus groups. The other discussion topics included expectations for and barriers to the GSP development process, priorities for water use in the Subbasin, projects and actions to manage groundwater, funding for SGMA implementation, and activities and communication channels for stakeholder outreach. The Stantec facilitator recorded the responses from focus group participants, and these notes were distributed to the participants for review following each focus group.

4.1.3 Stakeholder Assessment Findings

Stantec staff collated and analyzed the results of the stakeholder survey and focus groups interviews to identify common trends and deviations between the survey and focus group results. The results of this analysis were summarized in a series of presentation slides. Stantec staff presented the Stakeholder Assessment findings summary at a STRGBA GSA GSP Coordination meeting on June 10, 2020. Key findings from the Stakeholder Assessment include the following:

- Agricultural and municipal waters users in the Subbasin have differing opinions on how groundwater should be managed and who should pay for management actions and projects.
- Members of the general public have low interest in SGMA.
- SGMA is not perceived to be a broad threat to water users in the Subbasin.

 Stakeholders are most concerned about the costs and potential financial burden of implementing SGMA.

The Stakeholder Assessment findings serve as the basis for many of the selected outreach tools and activities recommended in this Plan. It is important to note that the Stakeholder Assessment was based on a statistically small sample size and some of the results may not represent the opinion of the majority of stakeholders in the Subbasin. For some issues, assessment findings were contrary to the common understanding of the Modesto GSAs representatives. For example, the focus group participants, who were primarily agricultural water users, stated that they felt fees for groundwater projects and management actions should be paid by all water users. However, some of the Modesto Subbasin GSAs representatives felt that a majority of their stakeholders preferred fees assessed on groundwater users only. Therefore, this Plan reflects both the findings from the Stakeholder Assessment as well as discussions with the GSAs representatives and best practices for stakeholder engagement in groundwater sustainability planning.

4.2 Outreach Tools

This section describes the suite of tools the Modesto Subbasin GSAs have developed, plan to develop, or may develop to disseminate information to the public and engage stakeholders in development of the GSP. The Modesto Subbasin GSAs intend to, on an as-needed basis, translate materials in Spanish or other languages to reach alternative-language communities. For unity, a common visual identity will be used for all printed and electronic information materials intended for public and stakeholder audiences.

4.2.1 Website

The Modesto Subbasin GSAs have developed websites to keep stakeholders and other interested parties informed of GSP development and implementation activities. The STRGBA GSA website (http://www.strgba.org) includes copies of informational, technical, and planning documents; STRGBA GSA meeting agendas and materials; information on the Modesto Subbasin; and member-agency contact information. In addition, the STRGBA GSA has and intends to continue to post draft GSP chapters on its website for public review and comment.

The Tuolumne County GSA has added a web page specific to SGMA on the Tuolumne County website (https://www.tuolumnecounty.ca.gov/1292/Sustainable-Groundwater-Management-Act-S). The page offers information for Tuolumne County residents residing in the Subbasin, and provides a link to the STRGBA GSA website.

4.2.2 Interested Parties Databases

California Water Code §10723.8 requires GSAs to "establish and maintain a list of persons interested in receiving notices regarding plan preparation, meeting announcements, and availability of draft plans, maps, and other relevant documents." Pursuant to this requirement, the Modesto Subbasin GSAs have each developed an Interested Parties Database. An Interested Parties Database is a list of individuals, organizations, or agencies that have expressed interest in being informed about the GSAs' activities and development of the GSP. The Modesto Subbasin GSAs use their Interested Parties Databases as the primary contact lists for public meetings, workshops, and announcements related to SGMA implementation in the Modesto Subbasin. Interested parties can self-select to be added to the Interested Parties

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Databases by filling out a form on the STRGBA GSA or Tuolumne County GSA websites or contacting their local GSA representative.

4.2.3 Newsletter

The STRGBA GSA has developed an electronic newsletter to keep interested parties informed about GSP development activities, upcoming opportunities for public engagement, and news alerts on statewide issues of importance to SGMA. Each newsletter is typically one to two pages in length and distributed electronically through an email to the Interested Parties Databases on a quarterly basis. Copies of the newsletter are also made available on the STRGBA GSA website.

4.2.4 Informational Materials

The Modesto Subbasin GSAs intend to develop a suite of informational materials aimed at educating members of the public and stakeholders about key SGMA topics, and for keeping interested parties informed about GSP development and implementation. These materials can be used to bridge information gaps between agricultural and municipal water users, regarding SGMA and groundwater conditions in the Modesto Subbasin. The Modesto Subbasin GSAs intend to adapt the materials over time as the GSP is completed, adopted, and implemented; and may have the materials translated into Spanish and other languages on an as-needed basis to reach alternative-language communities. As such, these documents are fit-for-purpose outreach tools that include the following:

Fact Sheets

The Modesto Subbasin GSAs may develop a suite of informational fact sheets aimed at educating members of the public about SGMA and key topics identified in the GSP. The purpose of the fact sheets is to prepare interested parties to provide meaningful input on the GSP and to encourage engagement at public meetings and workshops. Fact sheet topics may include the following:

- SGMA 101: Aimed at a general audience, this fact sheet provides an introductory-level overview of SGMA, the Modesto Subbasin, the Modesto Subbasin GSAs, and the GSP development process.
- Groundwater Conditions: This fact sheet educates stakeholders about historical and current groundwater conditions in the Modesto Subbasin, including groundwater supply, storage, and quality.
- Water Budget: This fact sheet explains a water budget, water budget inputs/outputs, and how the water budget will be used as part of the GSP.
- Sustainable Management Criteria: This fact sheet defines key terms related to sustainable management criteria, including minimum thresholds and measurable objectives, and describe how the sustainable management criteria will be used to manage groundwater conditions in the Subbasin.
- Overview of the Modesto Subbasin GSP: This fact sheet provides an overview of each chapter of the GSP, and then describes the GSP public comment and adoption process.

The fact sheets can be distributed through postings on websites and/or distributing them electronically or via hard copy through existing communication channels.

Presentation Slides

The Modesto Subbasin GSAs have developed a set of template presentation slides aimed at educating members of the general public about SGMA, the Modesto Subbasin, and the GSAs' governance structure. These slides help ensure consistent messaging and reinforce a cohesive visual identity that unifies materials across the Subbasin.

These slides may be adapted for use at public meetings, workshops, and presentations to community groups or agency decision-making bodies (e.g., boards or city councils).

Notices

The Modesto Subbasin GSAs may develop fliers, email text, social media posts, and other types of notices to promote public meetings, workshops, and other opportunities for public involvement. The Modesto Subbasin GSAs will distribute these notices to the Interested Parties Databases, customers and constituents of the member agencies, and other stakeholders. The materials may be distributed via email, by posting on websites and social media accounts, and/or delivered by hard-copy mailings.

The GSAs may also periodically develop template email, social media posts, and/or website text to promote public comment periods and educate members of the public on key SGMA topics. To the extent possible, these posts will be scheduled to align with other public outreach events (e.g., National Groundwater Awareness Week, Public Works Week).

News Releases

The Modesto Subbasin GSAs may develop news releases aimed at informing the media about upcoming public events and GSP development milestones, including the release of public documents.

4.3 Outreach Activities

The Modesto Subbasin GSAs may conduct and monitor a variety of public outreach activities to inform, engage, and respond to stakeholders and other interested parties during GSP development, adoption, and later, implementation. These activities serve to engage and interact with the public and stakeholders during GSP development, and to assist GSA staff and leadership in collecting information important to groundwater sustainability planning. This engagement and interaction will occur through six primary activities: regular GSP development meetings, member agency briefings, public workshops, community presentations, GSP office hours, and partnerships with local organizations in the Subbasin. Each of these activities are further described below.

Most of these activities will be promoted through similar outreach tactics, including sending an email to the Interested Parties Databases, posting on the Modesto Subbasin GSAs' websites, and adding updates about them to the STRGBA GSA newsletter. In addition, some activities may require other tactics to target specific stakeholder groups. The activities identified in this section are assumed to be promoted by these standard tactics, unless otherwise noted in the activity description.

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In response to social-distancing and local health ordinances resulting from the COVID-19 pandemic, the Modesto Subbasin GSAs are prepared to adapt these activities to virtual or other distance-engagement formats. The GSAs will utilize online collaboration platforms and implement best practices for virtual engagement. In addition, the GSAs may relay information and materials through trusted organizations and existing communication channels in the Subbasin, to keep stakeholders—who may not have access to the technical equipment required to engage—virtually informed.

4.3.1 GSP Development Meetings

The primary way for members of the public to provide input on development of the GSP is by attending and providing public comment at standing public meetings of the Modesto Subbasin GSAs. The STRGBA GSA holds monthly meetings and bi-monthly Technical Advisory Committee meetings. Both of these meetings include GSP development updates and discussions and are open for the public to attend and provide comment. These meetings are also open to stakeholders from the Tuolumne County GSA and include participation from a Tuolumne County GSA representative. The meetings' calendar and associated materials are available on the STRGBA GSA website. The meetings are additionally noticed by emails to the Interested Parties Databases.

4.3.2 Member Agency Briefings

Representatives for the Modesto Subbasin GSAs, or consultant staff, regularly brief member agency councils and boards on the status of GSP development and upcoming outreach activities. These briefings are conducted during member agencies' publicly noticed meetings, which include opportunities for public comment. The primary purpose of these briefings is to update the member agencies' governing bodies on GSP progress and next steps, and to respond to questions. These presentations also provide opportunities to share and describe how elements of the GSP apply to the service area of the respective member agency. The frequency of member agency briefings varies by the agency and GSP development process phase.

In addition to regular briefings throughout development of the GSP, the Modesto Subbasin GSAs may also brief each of the member agencies during the public review and comment process for the Public Draft GSP. This public comment process is further described in **Section 6.0**, below.

4.3.3 Public Workshops

Public workshops are another venue to educate the public about SGMA, collect feedback on results of technical analyses, and solicit input on the content of the draft GSP chapters. **Table 2**, below, identifies the anticipated schedule, topics, and desired outcomes for the GSP development workshops for the Subbasin.

Table 1. GSP Development Workshops

Tentative Date	Topics	Desired Outcome(s)
Summer 2020	 Introduction to SGMA Modesto Subbasin Modesto Subbasin GSAs GSP Development Process 	Educate the public about SGMA and identify how interested parties can engage in the GSP development process.
Fall 2020	 Groundwater Conditions Introduction to Water Budgets 	 Educate stakeholders on current and projected groundwater conditions in the Modesto Subbasin. Provide an overview of purpose and components of water budgets to prepare stakeholders to participate in the next workshop.
Winter 2020	Water BudgetsIntroduction to Sustainable Management Criteria	 Receive feedback on the drafted past, current, and future water budgets for the Modesto Subbasin. Provide an overview of the key components of sustainable management criteria to prepare stakeholders to participate in the next workshop.
Spring 2021	Sustainable Management Criteria Groundwater Monitoring	 Receive feedback on the draft minimum thresholds and measurables objectives for the Modesto Subbasin. Describe the groundwater monitoring network.
Fall 2021	Public Draft GSP	 Provide a forum for stakeholders and interested parties to discuss comments on the Public Draft GSP.

Key:

GSA = Groundwater Sustainability Agency

GSP = Groundwater Sustainability Plan

SGMA = Sustainable Groundwater Management Act

The format of each workshop will be adapted according to the workshop content, feedback from stakeholders, and changing conditions in the Subbasin. During periods when state and local ordinances limit or prohibit in-person gatherings, workshops may be held using virtual collaboration platforms (e.g., Zoom, GoToMeeting/GoToWebinar, Microsoft Teams). The Modesto Subbasin GSAs intend to record both the virtual and in-person workshops and post the recordings on STRGBA GSA's website and YouTube page for public viewing. This tactic allows those unable to attend—either due to scheduling conflicts or health and safety concerns—to have the ability to stay informed about GSP development.

4.3.4 Community Presentations

The Modesto Subbasin GSAs may conduct presentations to existing civic, nonprofit and other community organizations to build and maintain awareness about SGMA, encourage participation at public meetings and workshops, and to encourage self-selection into the Interested Parties Databases. Representatives from the Modesto Subbasin GSAs will conduct the presentations. Presenters will be encouraged to use the template presentation slides and other informational materials to ensure consistent messaging and branding.

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Should these presentations take place and in the early stages, the Modesto Subbasin GSAs intend to focus on building awareness and partnerships with local organizations and agencies identified during the Stakeholder Assessment as potential "partner agencies." Subsequent presentations may be provided upon request by organizations or stakeholder groups. The presentations will be tracked in the Communications Plan Database, described in **Section 5.0**, below.

4.3.5 GSP Office Hours

The Modesto Subbasin GSAs may hold periodic GSP office hours to answer questions on the draft GSP chapters and to promote dialogue between stakeholders and GSA representatives. Office hours' activities are typically informal and do not have a specific agenda or discussion topic. Instead, the discussion topics are driven by questions from the participants. Participants will be notified of GSP office hours through the standard outreach tactics, as well as via messaging to local community groups as necessary.

Office hours may be held in-person or virtually utilizing an online collaboration platform. The Modesto Subbasin GSAs will select a designated time frame for the office hours; interested parties can join at any time during this period. One or more representatives from the GSAs will be available during the entirety of the office hours period to answer questions. Once an interested party joins, he or she may ask any questions related to SGMA or the GSP. The GSA representative(s) will record the question, and respond. GSA representatives intend to summarize the questions received and comments during the office hours for the other members of the GSA and technical consultant staff during regular GSP development or Technical Advisory Committee meetings.

4.3.6 Partnerships with Local Organizations

The Modesto Subbasin GSAs may partner with local community and industry organizations to broaden the dissemination of SGMA information and connect with stakeholder groups. Participants in the Stakeholder Assessment identified the following active organizations in the Subbasin:

- Almond Alliance of California
- Manufacturers Council of the Central Valley
- Stanislaus County Farm Bureau
- Tuolumne County Farm Bureau
- Western United Dairies

The Modesto Subbasin GSAs may identify additional potential partner organizations during GSP development. The Modesto Subbasin GSAs already maintain relationships with many of these organizations and intend to keep them informed throughout GSP development and implementation through personal communications or one-on-one meetings. The Modesto Subbasin GSAs may also ask partner agencies to distribute notices and materials to their stakeholders and offer to cohost events, workshops, and GSP office hours.

4.4 Targeted Stakeholder Outreach Tools and Activities

In addition to general public outreach, the Modesto Subbasin GSAs may also conduct outreach to targeted stakeholder groups that may be underrepresented in public-involvement activities or that benefit from targeted messaging or engagement.

4.4.1 Tribes

No tribes were identified in the list of beneficial users included in the STRGBA GSA initial notification. However, the STRGBA GSA may consider filling a Sacred Lands File & Native American Contacts List Request with the Native American Heritage Commission to determine whether a tribe has indicated sacred land or traditional/cultural resources interest within the Modesto Subbasin. If tribes are identified, STRGBA member agencies would convene to discuss engagement options consistent with applicable regulatory requirements and existing tribal consultation processes or agreement(s).

The Tuolumne County GSA's initial notification listed two tribes with potential interests in their region: the Tuolumne-Band of the Me-Wuk Indians and the Chicken Ranch Rancheria Band of the Me-Wuk Indians of California. The Tuolumne County GSA will consult with these tribes to identify and consider their interests.

4.4.2 Agricultural Water Users

Agriculture plays a vital role in both the economy and the social fabric of the Subbasin, and groundwater resources are essential to maintaining this industry. Engaging agricultural water users will be key to the success of the GSP. The elected boards and councils of Modesto Subbasin GSAs provide broad agricultural representation. MID and OID already conduct outreach on groundwater management practices and SGMA to their agricultural customers. MID holds annual grower meetings before the start of irrigation season; publishes a bi-annual newsletter (The Irrigator) for their irrigation customers; and provides a water report, which includes highlights of GSA activities, at MID Board of Directors' meetings. In addition, MID maintains a website, which includes a page specifically on water supply management, and active social media accounts (Facebook, Twitter, and YouTube). OID staff provide regular updates and periodic presentations at public OID Board of Directors meetings, publish a regular newsletter, and included SGMA updates on OID's website. MID and OID intend to incorporate SGMA messaging into these ongoing communication activities to keep agricultural water users informed about the GSP development process.

In addition, the Modesto Subbasin GSAs may conduct targeted outreach to agricultural water users in the *non-districted* areas of the Subbasin. A non-districted area is an area where private well owners/operators are represented under SGMA by the county of record, often in absence of a municipality, irrigation district, water district, or other special district eligible to serve as a local public agency under California Water Code §10723(n). Most of the non-districted areas are in the eastern, unincorporated portion of the Subbasin where groundwater is commonly used for both agricultural and domestic water supplies. There are approximately 75,000 acres of non-districted land in the eastern subbasin. A portion of this area is being represented by Water & Land Solutions, a consulting firm hired to represent local landowners' interests in GSP development for the Subbasin. The Modesto Subbasin GSAs are working with Water & Land Solutions to gather data and engage with stakeholders in the region he represents. In addition, Stanislaus and Tuolumne Counties intend to develop a database of landowners in all non-

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districted areas and to engage those landowners through direct mailings, targeted webinars/meetings, and in partnership with local community and industry organizations.

4.4.3 Urban Water Users

A key finding from the Stakeholder Assessment focus groups was that water users in urban areas of the Subbasin were perceived to have less interest in participating in the GSP development process than agricultural water users or water users in rural areas. This finding was supported by the results from the stakeholder survey that indicated that municipal water users (who often live in urban areas) generally have less of an understanding of SGMA than agricultural water users.

To bridge this knowledge gap, and to encourage engagement with urban water users, the Modesto Subbasin GSAs may conduct targeted outreach in urban areas. These activities may include developing fact sheets on groundwater use and conditions in the Modesto Subbasin and distributing these materials through existing communication channels and community gathering locations (e.g., libraries, community centers, civic centers); providing presentations on SGMA to local civic and community organizations; and inviting community leaders to GSP office hours. Each of these activities is furthered described in **Section 4.3**, above. In addition, the GSAs may develop key messages on the importance of groundwater to the local economy and environment, and to incorporate these messages in all informational materials and talking points.

4.4.4 Disadvantaged Communities

California Code of Regulations §79505.5(a) defines a *disadvantaged community* as a "community with an annual median household income (MHI) that is less than 80 percent of the statewide annual median household income." The American Community Survey of the US Census Bureau provides a dataset than can be used as a source to estimate a community's MHI. According to 2012–2016 American Community Survey 5-Year Estimates, California's statewide MHI is \$63,783. Thus, a community with an MHI less than or equal to \$51,026 is considered disadvantaged.

The Modesto Subbasin GSAs' boundaries include three census-designated places considered disadvantaged by the state: Empire, Airport, and West Modesto. These communities are also identified in DWR's DAC Mapping Tool. The MHI for each is identified in **Table 3** below. All three of these communities are located within and receive water from the City of Modesto. Therefore, they will be represented by the City of Modesto during the groundwater sustainability planning process.

Table 2. Communities Designated as Disadvantaged in the Modesto Subbasin

Census-Designated Place	Median Household Income ¹
Airport	\$ 29,868
City of Modesto	\$ 50,996
City of Waterford	\$ 49,500
Empire	\$ 35,519
Rouse	\$ 33,292
West Modesto	\$ 30,682

Notes

Individuals living in communities state-designated disadvantaged face unique challenges when it comes to participating in public planning processes. This may include physical and/or linguistic barriers which may impede their ability to provide input on plans or regulations that impact them. The Modesto Subbasin GSAs intend to use best practices to help address barriers these communities may face in participating in the GSP development and implementation processes. These may include translating materials and fliers into multiple languages, offering interpreting services at public workshops and meetings, holding workshops and meetings at familiar and trusted locations (e.g., schools, community centers, churches), and ensuring workshops/meetings are held at times accessible by a wide range of people. (Note that due to social-distancing and local health ordinances resulting from the COVID-19 pandemic, many of the subbasin's outreach activities are being adapted to virtual engagement formats.)

The Modesto Subbasin GSAs may also partner with local community advocates or organizations to educate community members about SGMA and to encourage involvement in public events. Often leveraging the communication channels of these trusted messengers is a more effective means of reaching DACs than traditional communication methods.

4.4.5 Watershed Stewardship Organizations

GSAs are obligated to consider the potential impact of sustainable groundwater management activities on groundwater-dependent ecosystems. These considerations may range from monitoring activities to steps to preserve and expand these natural resources. Stewardship of these resources has primarily been led through a combination of regulatory and nonprofit organizations. In the Subbasin, the Tuolumne River Trust—an advocacy group representing the Tuolumne River—is actively involved in water-management planning activities. Other organizations may include The Nature Conservancy, Stanislaus Audubon Society Chapter, and others. These organizations represent sources of valuable input on the subject matter of groundwater-dependent ecosystems that are being considered during GSP development.

The Modesto Subbasin GSAs may engage leadership from these groups throughout the groundwater sustainability planning process for discussion of environmental water needs and groundwater-dependent ecosystems. These meetings may include participation from other watershed stewardship organizations in the Subbasin. In addition, interested stewardship organizations may also request briefings with the Modesto Subbasin GSAs and participate in the outreach activities described in **Section 4.3**, above.

¹Median Household Income is based on 2014–2018 American Community Survey 5-Year Estimates

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4.4.6 Government and Land-Use Agencies

The Modesto Subbasin GSAs may engage local and regional governmental and land-use agencies early and throughout the GSP development process. This may include presentations or meetings with local planning commissions, local agency formation commissions, and housing authorities (e.g., Housing Authority of City of Riverbank, Stanislaus Regional Housing Authority). In addition, local cities and counties will receive notice at least 90-days prior to adoption of the Final GSP, as described in **Section 6.2**.

5.0 SUMMARY OF ENGAGEMENT

Legal Requirements:

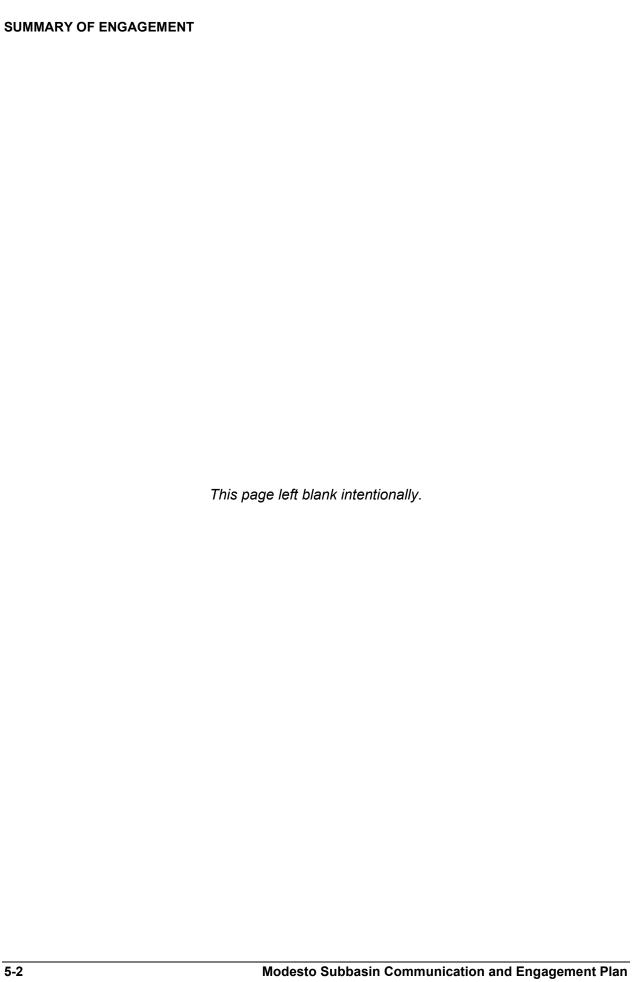
§354.10 Each plan shall include a summary of information relating to notification and communication by the Agency with other agencies and interested parties including the following:

 A list of public meetings at which the Plan was discussed or considered by the Agency.

SGMA requires that GSAs include a list of public meetings at which the GSP was discussed or considered by an agency. To fulfill this requirement, and to follow best practices for outreach and communication, each GSA should develop a tool or database to track all SGMA-related outreach conducted by the agency.

Modesto Subbasin GSAs have developed the Communications Plan Database to track all SGMA public and stakeholder engagement activities and to identify potential organizations, individuals, and media contacts where outreach was sent. Within the database, stakeholders are placed into three tiers, based on the stakeholders' level of interest and current and potential uses of groundwater: (1) Tier A, (2) Tier B, or (3) Tier C.

The database is currently in an electronic (Microsoft Excel) format. The database may be posted on a platform accessible by member agencies (e.g., SharePoint, DropBox) to allow agency staff to update it as outreach is conducted. However, a single individual should be identified to ensure the database is kept current and properly maintained. A copy of the Communications Plan Database will be attached to the Final GSP to demonstrate the Modesto Subbasin GSAs' efforts to involve members of the public in GSP development and to comply with California Code of Regulations §354.10.



6.0 PUBLIC ENGAGMENT IN GSP ADOPTION

Legal Requirements:

§354.10 Each plan shall include a summary of information relating to notification and communication by the Agency with other agencies and interested parties including the following:

(c) Comments regarding the Plan received by the Agency and a summary of any responses by the Agency.

§10728.4

(2) A groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The groundwater sustainability agency shall review and consider comments from any city or county that receives notice pursuant to this section and shall consult with a city or county that requests consultation within 30 days of receipt of the notice.

This chapter describes requirements and approaches for collecting and summarizing comments on the Draft GSP and required steps necessary, prior to GSP adoption.

6.1 Public Comment Process

California Code of Regulations §354.10 states that each GSP must include a summary of comments received regarding the GSP and a summary of any responses that resulted from the GSA. However, the SGMA regulations do not provide a prescriptive public review process or comment period for the Public Draft GSP. After the Final GSP is submitted to DWR, the agency will post the GSP to its website and hold a public comment period. Pursuant to California Code of Regulations §353.8(b), the minimum period for public comment is 60 days. However, DWR intends to open the comment period for 75 days or more.

The Modesto Subbasin GSAs intend to release the Draft GSP chapters for public review and comment as the chapters are developed. Chapters will be released individually or in groups in a phased or serial review process. The Modesto Subbasin GSAs intend to post the drafts on the STRGBA GSA website for review and to collect comments through a designated project email address, direct mail, or at public workshops and meetings. Interested parties will have a designated time (e.g., 30 days) to review the draft chapters and submit comments. Comments received during the comment period will be reviewed by the Modesto Subbasin GSAs and consultant staff. In addition, the Modesto Subbasin GSAs intend to provide a summary of comments received and intends to post on the STRGBA GSA website.

Once all the draft chapters have been released and revised, the Modesto Subbasin GSAs intend to issue a complete Public Draft GSP for further public review and comment. The Public Draft GSP will be released for a 45-day public comment period in Fall 2021. Public comments will be collected via direct mail and email. In addition, the Modesto Subbasin GSAs intend to

PUBLIC ENGAGMENT IN GSP ADOPTION

hold a special STRGBA GSA GSP development meeting and possibly GSP office hours to answer stakeholder questions.

The Modesto Subbasin GSAs intend to summarize comments received during this 45-day period and to present them in a GSP Public Comment Summary attached to the Final GSP. The GSP Public Comment Summary will describe the public comment process, summarize the major themes or topics that individuals submitted comments on, and will include copies of written comments. In addition, any comments that raise substantive technical or policy issues may be addressed in the Final GSP text.

6.2 Notice to Cities and Counties

California Water Code §10728.4 states that a GSA must provide notice to any cities or counties within the GSP area at least 90-days prior to adopting or amending a GSP at a public meeting. The cities and counties have 30 days upon receipt of the notice to request consultation on the plan. Pursuant to these requirements, the Modesto Subbasin GSAs will develop and distribute a notice to cities and counties within the Subbasin during the Public Draft GSP public comment period, no later than 90 days before the first scheduled GSP adoption hearing.

The notice will provide an overview of SGMA and the GSAs; identify where the Public Draft GSP can be viewed, or copies can be obtained; identify the time, date, and location for the adoption public hearing(s); and describe the method for agencies to submit consultation requests. A single point of contact should be identified in the notice; however, requests for consultation should be collectively reviewed by Modesto Subbasin GSAs and a collective response should be developed and distributed to the consulting agencies. Cities and counties will have 30-days to respond to the notice.

6.3 Final GSP Adoption Process

Following the 30-day consultation request period, if no cities or counties have requested consultation, the Final GSP will be adopted at a series of public hearings. Each of the STRGBA GSA member agencies will adopt the Final GSP at a public hearing held by each agency's governing body. The Tuolumne County GSA will adopt the Final GSP at a public hearing held by the Tuolumne County Board of Supervisors. These hearings may be held as part of the agencies' standard public meetings, or at a special meeting of the governing body. Notices for the public hearings will follow all applicable local, state, and federal regulations regarding meeting noticing practices that apply.

At this time, it is not anticipated that fees would be adopted with the Final GSP. However, if fees are associated with adoption of the Final GSP, then additional public meeting notices will be required pursuant to Government Code §6066.

7.0 PUBLIC ENGAGEMENT IN GSP IMPLEMENTATION

Legal Requirements:

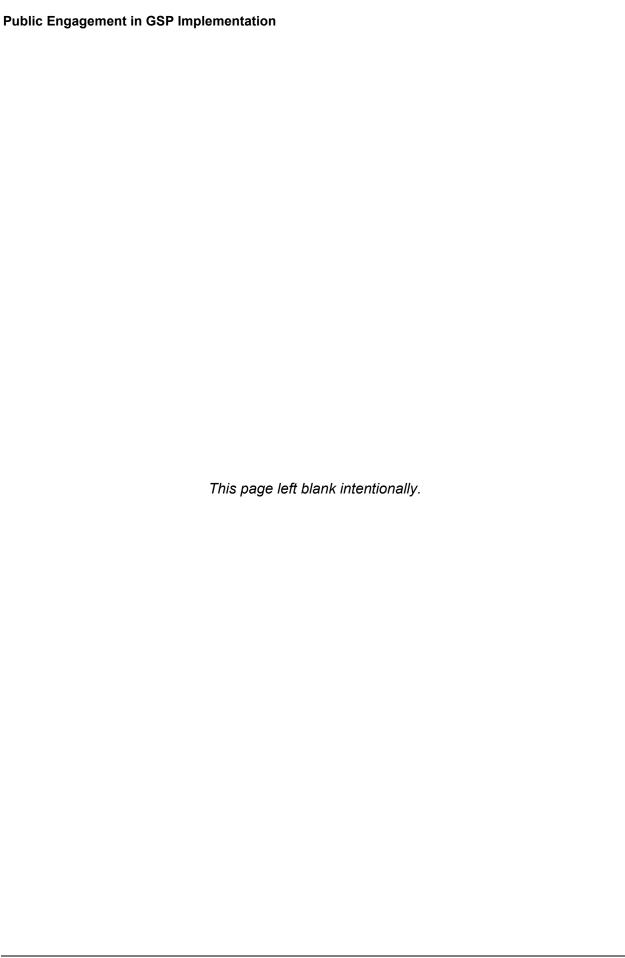
§354.10 (d)

(2) The method the Agency shall follow to inform the public about progress implementing the Plan, including the status of projects and actions.

Note: This section will be revised and expanded upon next year, depending upon the implementation identified in the Draft GSP.

As part of its GSP, the Modesto Subbasin GSAs must describe how they plan to inform the public about progress in implementing the GSP. GSP implementation outreach activities should build upon activities conducted during GSP development. Successful activities should be continued throughout GSP implementation and then updated to include new stakeholder groups and prevailing issues.

The primary methods to inform the public about progress of the GSP include posting on the websites for STRGBA GSA, Tuolumne County GSA, and member agencies; sending out progress information to the Interested Parties Databases; and holding regular public meetings focused on GSP implementation. In addition, the Modesto Subbasin GSAs may choose to continue other general public outreach activities, such as GSP office hours, community presentations, and the newsletter. Informational materials and website content will be updated at key implementation milestones (e.g., annual reporting periods, Five-Year Updates) to reflect the status of the GSP and Subbasin conditions. In addition, new materials will be developed to help the public understand next steps and how they can stay engaged in GSP implementation.



8.0 INTER- AND INTRA-BASIN COORDINATION

Legal Requirements:

§ 357.2. Inter-basin Agreements

Two or more Agencies may enter into an agreement to establish compatible sustainability goals and understanding regarding fundamental elements of the Plans of each Agency as they relate to sustainable groundwater management.

The Modesto Subbasin is surrounded by the Turlock Subbasin to the south, Eastern San Joaquin Subbasin to the north, and Delta-Mendota Subbasin to the west. It is bounded to the east by the Sierra Nevada Foothills. Many Modesto Subbasin GSAs' member agencies are also members of one or more GSAs in these and other subbasins. SGMA does not require a formal inter-basin coordination agreement; however, per California Code of Regulations §357.2, Modesto Subbasin GSAs' member agencies may choose to establish a voluntary agreement with GSAs or the Plan Manager in adjacent subbasins to address basin-boundary flow and other issues. These agreements often reflect the technical and governance issues most central to management of the regions' groundwater resources. GSAs and Plan Managers in some regions have established an inter-basin coordination committee or working group to discuss these types of issues. These groups often meet semi-annually or quarterly and include representation from each of the subbasins in the region.

As critically-overdrafted basins, two adjacent subbasins, Eastern San Joaquin Subbasin and Delta-Mendota Subbasin, submitted their GSPs to DWR in January 2020. The Modesto Subbasin GSAs may coordinate efforts with GSAs in these subbasins through semi-annual inter-basin coordination meetings focused on discussing inter-basin boundary flows and other regional issues of concern. These meetings also serve to share lessons learned from the GSP development and implementation process between the critically overdrafted and non-critically overdrafted subbasins. At least one of these meetings will be planned and hosted by the GSAs in the Delta-Mendota Subbasin, as part of their FSS grant to support inter-basin coordination.

The Turlock Subbasin is on the same GSP-submission schedule as the Modesto Subbasin, and it also shares the same groundwater model. In addition, some member agencies of the STRGBA GSA also serve communities in the Turlock Subbasin. Accordingly, the Modesto Subbasin GSAs are coordinating more frequently with the GSAs in the Turlock Subbasin. The Modesto Subbasin and Turlock Subbasin GSAs have already held inter-basin coordination meetings focused on ensuring consistent analyses along the shared Tuolumne River boundary, and plan to continue holding theses meeting moving forward. In addition, the GSAs in the subbasins intend to coordinate outreach efforts to stakeholders near the Modesto-Turlock Subbasins boundary. This may include developing and distributing joint notices and newsletters to landowners in this region, cohosting workshops or events, or cohosting GSP office hours focused on inter-basin coordination and Tuolumne River flows.

