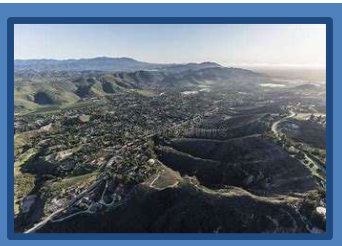
ARROYO SANTA ROSA GROUNDWATER SUSTAINABILITY AGENCY

GROUNDWATER SUSTAINABILITY PLAN WORKSHOP NO. 3

CAMROSA WATER DISTRICT

FEBRUARY 28, 2023, 6 PM



WORKSHOP AGENDA

No.	TIME	TOPIC
1	6:00 – 6:05 pm	Call to Order and ASRBGSA Chair Opening Comments
2	6:05 – 6:10 pm	Agenda Review
3	6:10 – 6:15 pm	Instructions for Commenting
4	6:15 – 7:00 pm	Presentation: GSP Summary
5	7:00 – 7:45 pm	Stakeholder Comments and Questions
6	7:45 – 7:55 pm	Executive Director and Board Member Comments
7	7:55 – 8:00 pm	Wrap-up

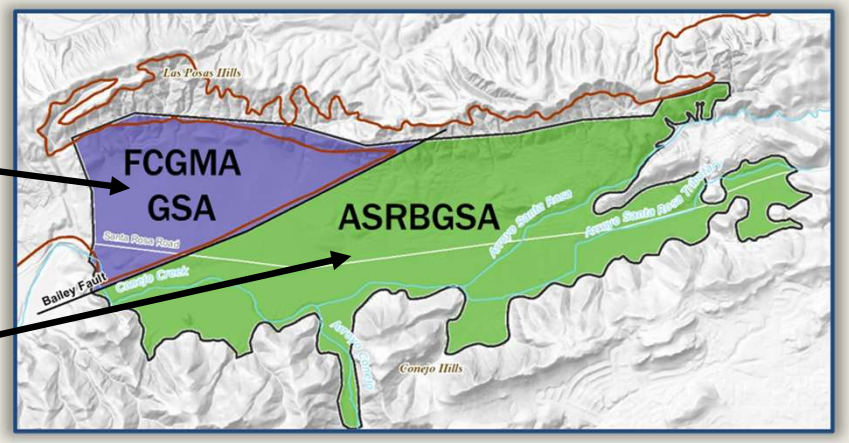
DRAFT GSP COMMENTING OPTIONS

1. Oral comments may be provided during this workshop
2. Submit written comments by March 17:
   - FCGMA Management Area: email to fcgma-gsp@ventura.org
   - ASRBGSA Management Area: email to donniea@camrosa.com

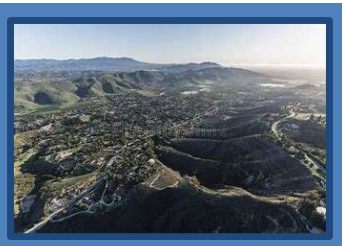
GSP Public Hearings and Adoption

ASRGSA – April or May (TBD)

FCGMA – May 24, 2023



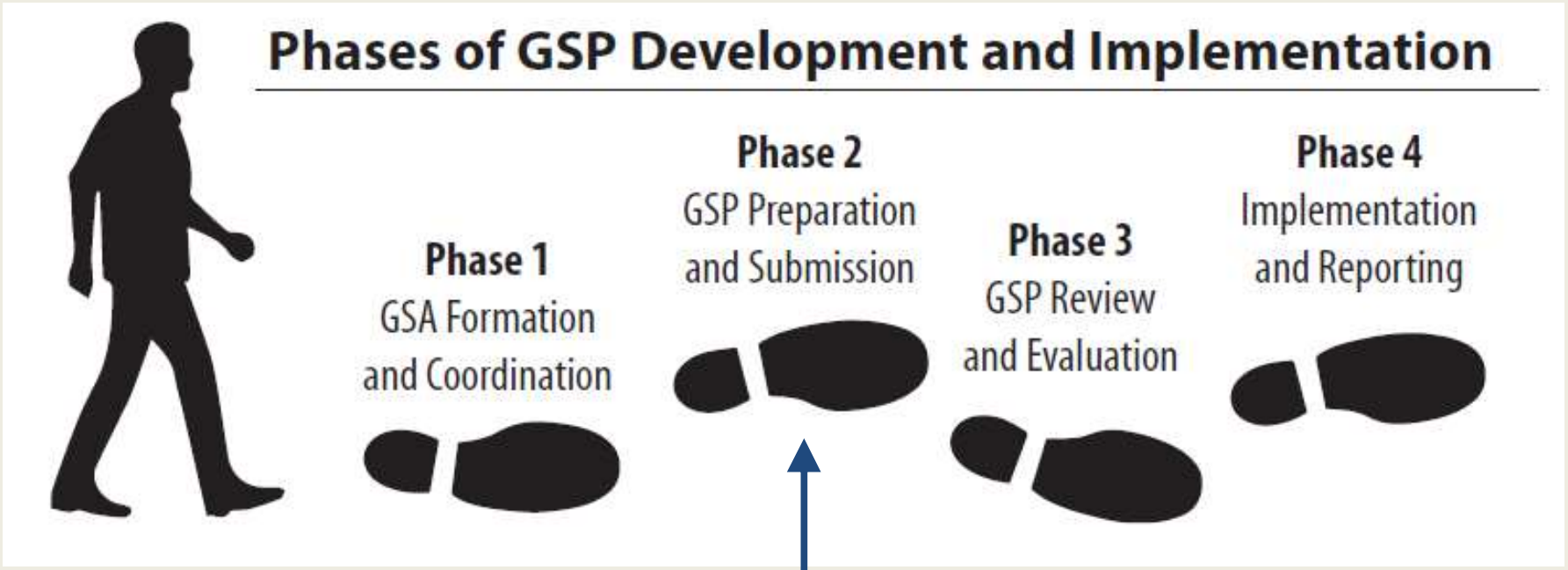
BACKGROUND



WHAT IS SGMA?

- Sustainable Groundwater Management Act
  - Three bill package signed into CA law in late 2014, replacing prior groundwater management legislation (AB 3030)
  - Provides a statewide framework for long-term sustainable groundwater management in CA
  - Requires basins subject to the act or that voluntarily opt in to be managed sustainably 20 years after adopting a Groundwater Sustainability Plan (GSP) by a local Groundwater Sustainability Agency (GSA)

WHAT DOES SGMA REQUIRE?



HISTORY OF SGMA IN ASRV BASIN

Initial basin priority was medium, making the basin subject to SGMA.

- ASRBGSA formed in 2016 to comply with SGMA

Initial efforts to prepare GSPs by FCGMA and ASRBGSA commenced.

Basin was reprioritized to low in 2019, making SGMA implementation optional.

- GSP put on hold.

ASRBGSA has voluntarily resumed work on a GSP under SGMA.

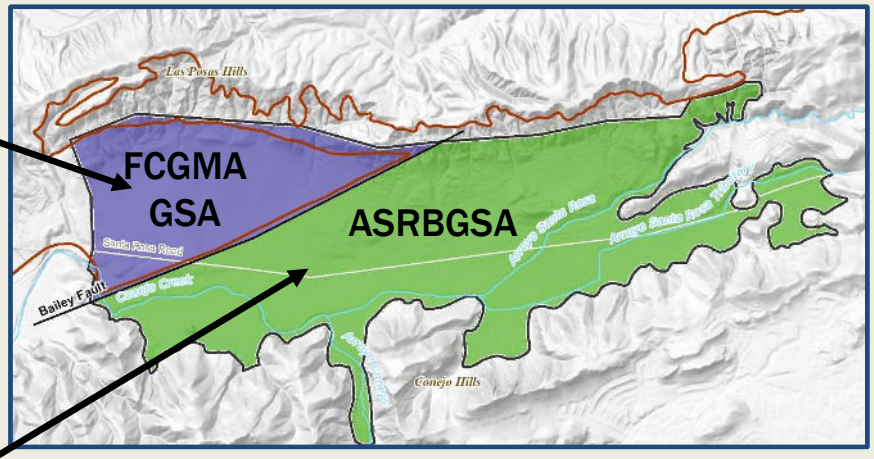
- GSP scheduled for completion in April 2023.

WHY DEVELOP AND IMPLEMENT A GSP?

- Basin has been managed under prior legislation since 1987
- SGMA is the only option for continued groundwater management.
- Continued groundwater management to:
  - Be good stewards of the Basin
  - Ensure reliability of local water supplies
  - Create more opportunities to enhance the basin (access to grants)

WHO WILL MANAGE ASRV BASIN GROUNDWATER?

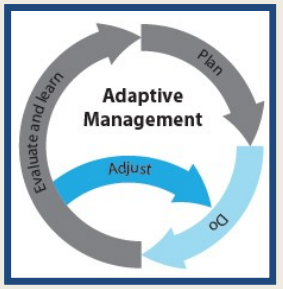
- Fox Canyon GMA
  - Special Act District formed in 1982
- ASRBGSA
  - Formed in March 2016 under a Joint Powers Authority Agreement between Camrosa Water District and Ventura County



A single GSP will be adopted by both GSAs for coordinated management of the entire basin

KEY SGMA CONCEPTS

- Overarching goal is to <u>avoid undesirable results for six sustainability indicators</u>,
- Undesirable results and actions to prevent them are defined by the GSAs, not the State
- SGMA requires data-driven management:
  - GSP must be developed with best available science and sustainability is demonstrated with monitoring data
- SGMA requires adaptive management
  - Updates required every 5 years



WHO IS DEVELOPING THE GSP?

- ASRBGSA and FCGMA will review & adopt the GSP
- GSP Development Team:

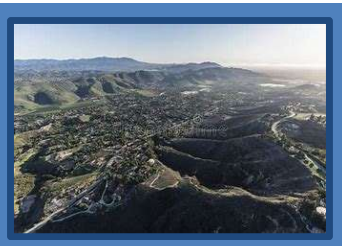
BONDY
Groundwater Consulting, Inc.

Bryan Bondy, PG, CHG
GSP Manager and GSP Contributor

INTERA
GEOSCIENCE & ENGINEERING SOLUTIONS

Abhishek Singh, PhD, PE & staff
Quantitative Analysis / Modeling
GSP Contributor & Document Lead

GSP SUMMARY



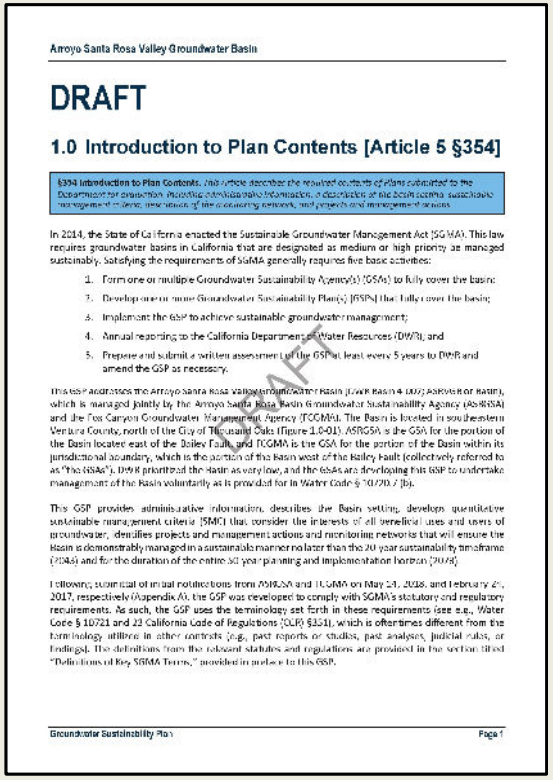
GSP CONTENTS

- Executive Summary
1. Administrative Information
2. Basin Setting
3. Sustainable Management Criteria
4. Monitoring Networks
5. Projects and Management Actions
6. Implementation

GSP LAYOUT

"Regulation Box" Describes the GSP Emergency Regulation that is addressed by the GSP section.

GSP content that addresses the GSP Emergency Regulation.



Arroyo Santa Rosa Valley Groundwater Basin

DRAFT

1.0 Introduction to Plan Contents [Article 5 §354]

§354 Introduction to Plan Contents. *This article describes the required contents of plans submitted to the Department for evaluation. Provides administrative information, a description of the basin setting, sustainable management criteria, description of the monitoring network, and projects and management actions.*

In 2014, the State of California enacted the Sustainable Groundwater Management Act (SGMA). This law requires groundwater basins in California that are designated as medium or high priority be managed sustainably. Satisfying the requirements of SGMA generally requires five basic activities:

1. Form one or multiple Groundwater Sustainability Agency(s) (GSAs) to fully cover the basin;
2. Develop one or more Groundwater Sustainability Plan(s) (GSPs) that fully cover the basin;
3. Implement the GSP to achieve sustainable groundwater management;
4. Annual reporting to the California Department of Water Resources (DWR); and
5. Prepare and submit a written assessment of the GSP at least every 5 years to DWR and amend the GSP as necessary.

This GSP addresses the Arroyo Santa Rosa Valley Groundwater Basin (DWR Basin 4-007; Basin or Basin), which is managed jointly by the Arroyo Santa Rosa Basin Groundwater Sustainability Agency (ASRGSA) and the Fox Canyon Groundwater Management Agency (FCGMA). The Basin is located in southeastern Ventura County, north of the City of Thousand Oaks (Figure 1.0-01). ASRGSA is the GSA for the portion of the Basin located east of the Bailey Fault, and FCGMA is the GSA for the portion of the Basin within its jurisdictional boundary, which is the portion of the Basin west of the Bailey Fault (collectively referred to as "the GSAs"). DWR prioritized the Basin as very low, and the GSAs are developing this GSP to undertake management of the Basin voluntarily as is provided for in Water Code § 10720.7 (b).

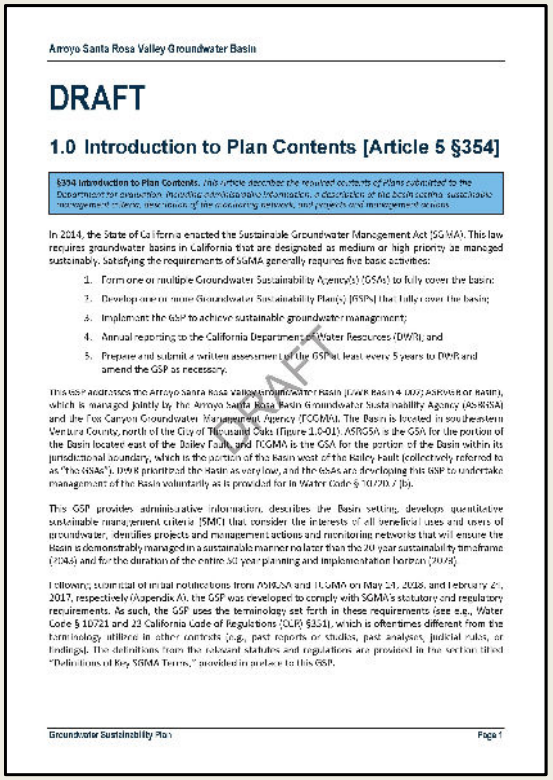
This GSP provides administrative information, describes the Basin setting, develops quantitative sustainable management criteria (SMC) that consider the interests of all beneficial uses and users of groundwater, identifies projects and management actions and monitoring networks that will ensure the Basin is demonstrably managed in a sustainable manner no later than the 20 year sustainability timeframe (2045) and for the duration of the entire 50 year planning and implementation horizon (2075).

Following submittal of initial notifications from ASRGSA and FCGMA on May 24, 2016, and February 2nd, 2017, respectively (Appendix A), the GSP was developed to comply with SGMA's statutory and regulatory requirements. As such, the GSP uses the terminology set forth in these requirements (see e.g., Water Code § 10721 and 23 California Code of Regulations (CCR) §351), which is oftentimes different from the terminology utilized in other contexts (e.g., past reports or studies, past analyses, judicial rulings, or findings). The definitions from the relevant statutes and regulations are provided in the section titled "Definitions of Key SGMA Terms," provided in public to this GSP.

Groundwater Sustainability Plan — Page 1

SECTION 1
INTRODUCTION TO PLAN CONTENTS

- SGMA Background
- Overview of GSP Contents



Arroyo Santa Rosa Valley Groundwater Basin

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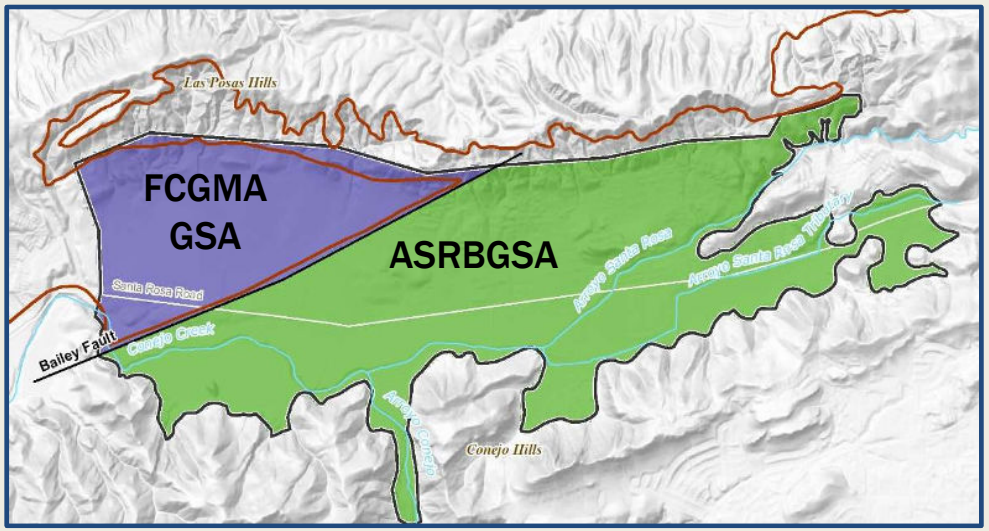
Groundwater Sustainability Plan — Page 1

SECTION 2
ADMINISTRATIVE INFORMATION

- Information about the GSAs
- Description of the Plan area
  - Jurisdictional areas
  - Water resources programs that impact groundwater management
  - Land use plans
- Public Notice and Communication

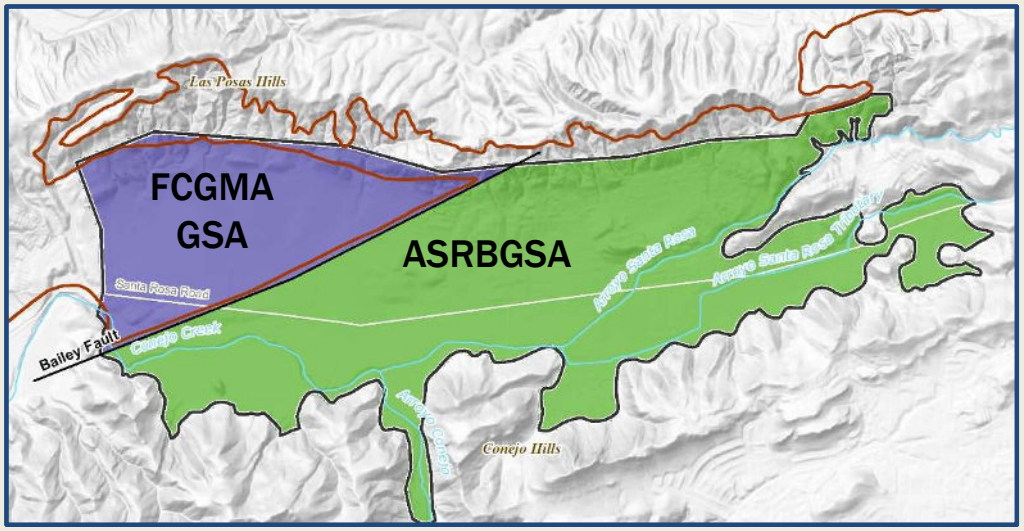


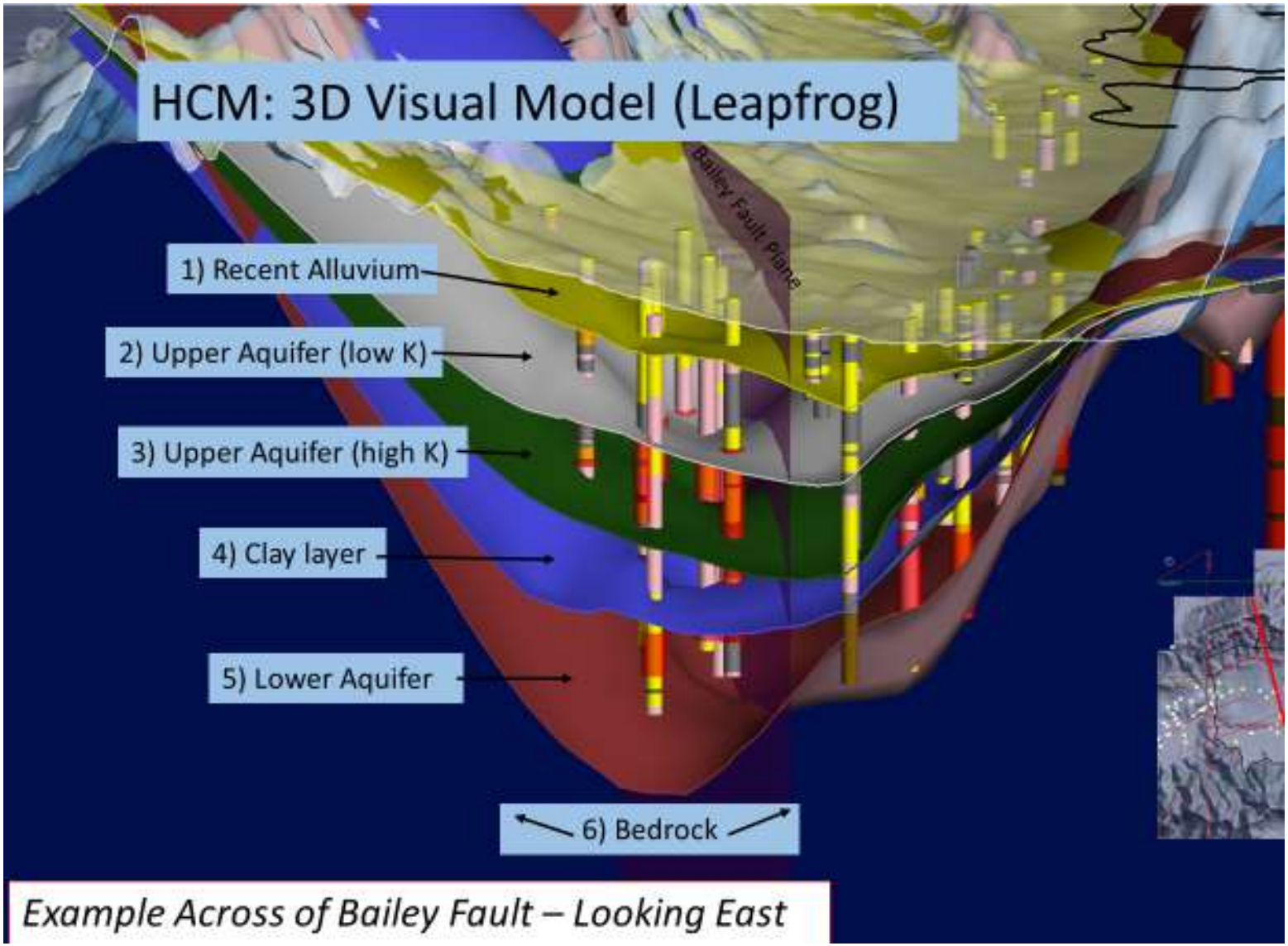
SECTION 3
BASIN SETTING

Sect. 3.1: Hydrogeologic Conceptual Model ("HCM")	• Description of the physical characteristics of the groundwater Basin
Sect. 3.2: Groundwater Conditions	• Description of historical conditions in the Basin
Sect. 3.3: Water Budgets	• Description of water inflows and outflows to/from the Basin

HYDROGEOLOGIC CONCEPTUAL MODEL KEY FINDINGS

- Two subbasins separated by Bailey Fault
  - Limited hydraulic connectivity
- Basin stratigraphy is complex and consists of six identifiable units



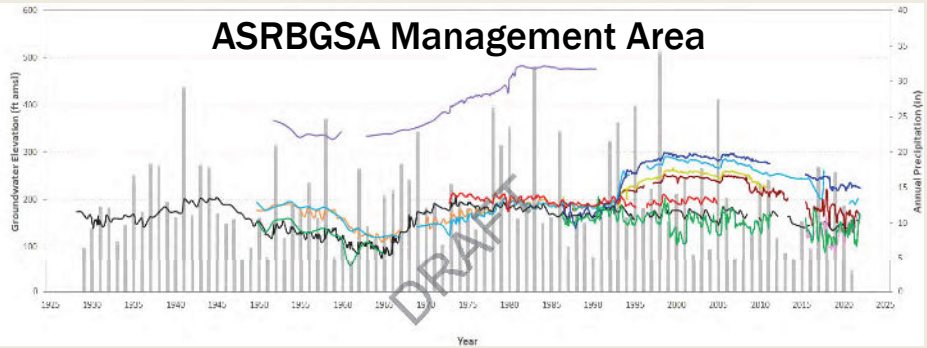


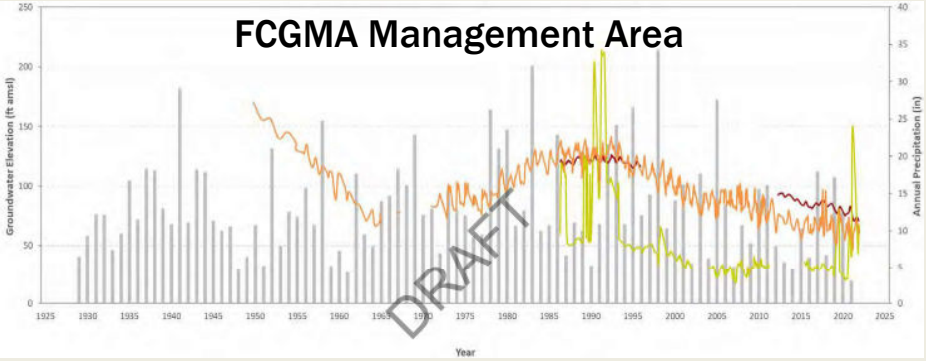
KEY BASIN SETTING INFORMATION FOR SUSTAINABLE MGMT. CRITERIA

- Complex basin stratigraphy
  - 6 layers identified
  - Most pumping and data are from "lower aquifer" (layer 5)
  - GSP addresses layers 1 -5

GROUNDWATER CONDITIONS KEY FINDINGS

- **Groundwater Levels & Storage:**
  - Rise/fall in dry/wet periods
  - No evidence of chronic declines





GROUNDWATER CONDITIONS KEY FINDINGS

- Groundwater Quality:
  - Marginal quality –TDS and chloride
  - Nitrate – managed by Camrosa via blending
  - 1,2,3-trichloropropane – Camrosa carbon removal
- Seawater Intrusion: Not applicable
- Subsidence: None detected

GROUNDWATER CONDITIONS KEY FINDINGS

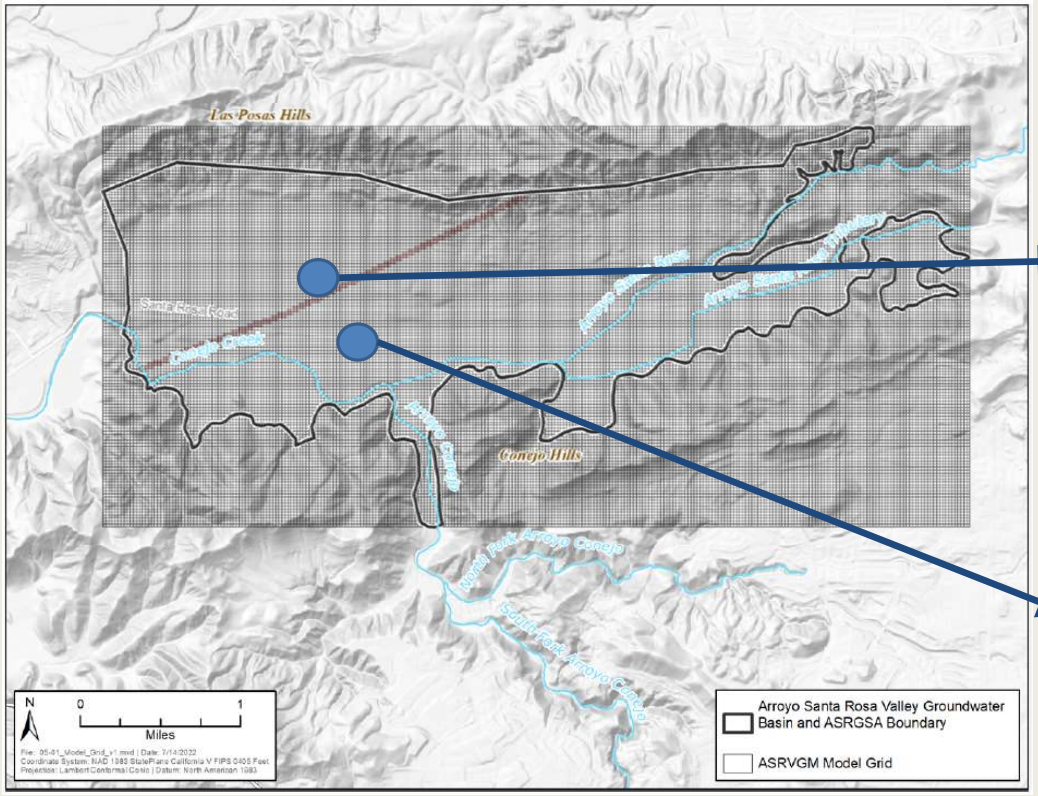
- Interconnected Surface Water (ISW):
  - Arroyo Conejo and Conejo Creek have ISW meaning that the water table intersects streambed
  - GSP must include sustainable management criteria for ISW depletions
- Groundwater Dependent Ecosystems –
  - None identified
  - Riparian vegetation along Arroyo Conejo and Conejo Creek largely absent prior to Hill Canyon treatment plant discharges

WATER BUDGET KEY FINDINGS

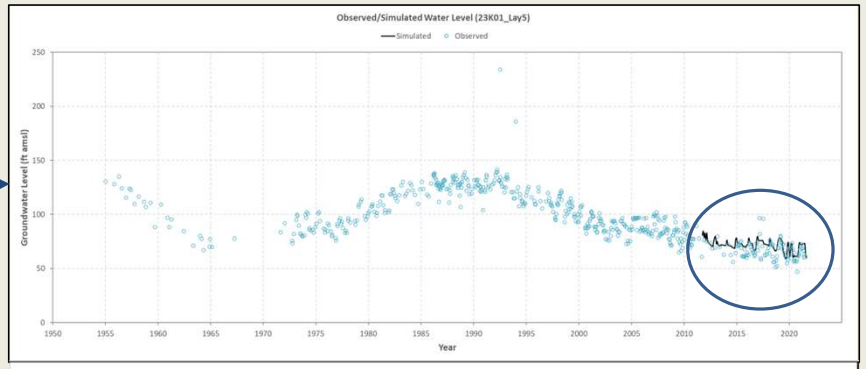
- Quantification of inflows and outflows to/from the basin
  - Consideration of future land use, population, and climate change
- Basin appears to be in balance
  - Calculated deficits are small and within error range of model accuracy

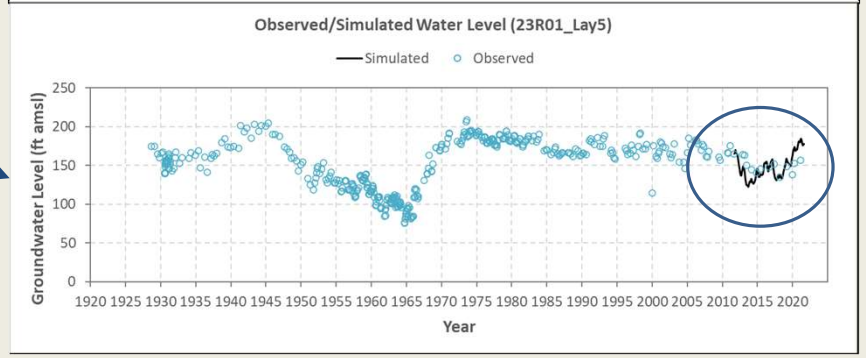
GW Budget Period	GW Inflows (AFY)	GW outflows (AFY)	Change in GW Storage (AFY)
Historical (2012-2021)	4,510	4,639	-129
Current (2019-2021)	4,506	3,459	1,047
Projected (50 years based on 1972-2021)	5,107	5,236	-130
Projected with 2030 Climate Change	5,179	5,311	-132
Projected with 2070 Climate Change	5,283	5,413	-130

WATER BUDGET DEVELOPMENT
NUMERICAL MODELING



Example Model Calibration Graphs





SECTION 4
SUSTAINABLE MANAGEMENT CRITERIA

- Sustainability Goal
- Sustainability Indicators

  - Undesirable Results
    - Significant and unreasonable effects *occurring throughout the basin* related to any of the six sustainability indicators
  - Minimum Thresholds
    - Quantitative metrics indicating undesirable results may exist *in a particular area*
  - Measurable Objectives
    - Quantitative metrics that reflect basin desired conditions in a particular area

SUSTAINABILITY GOAL

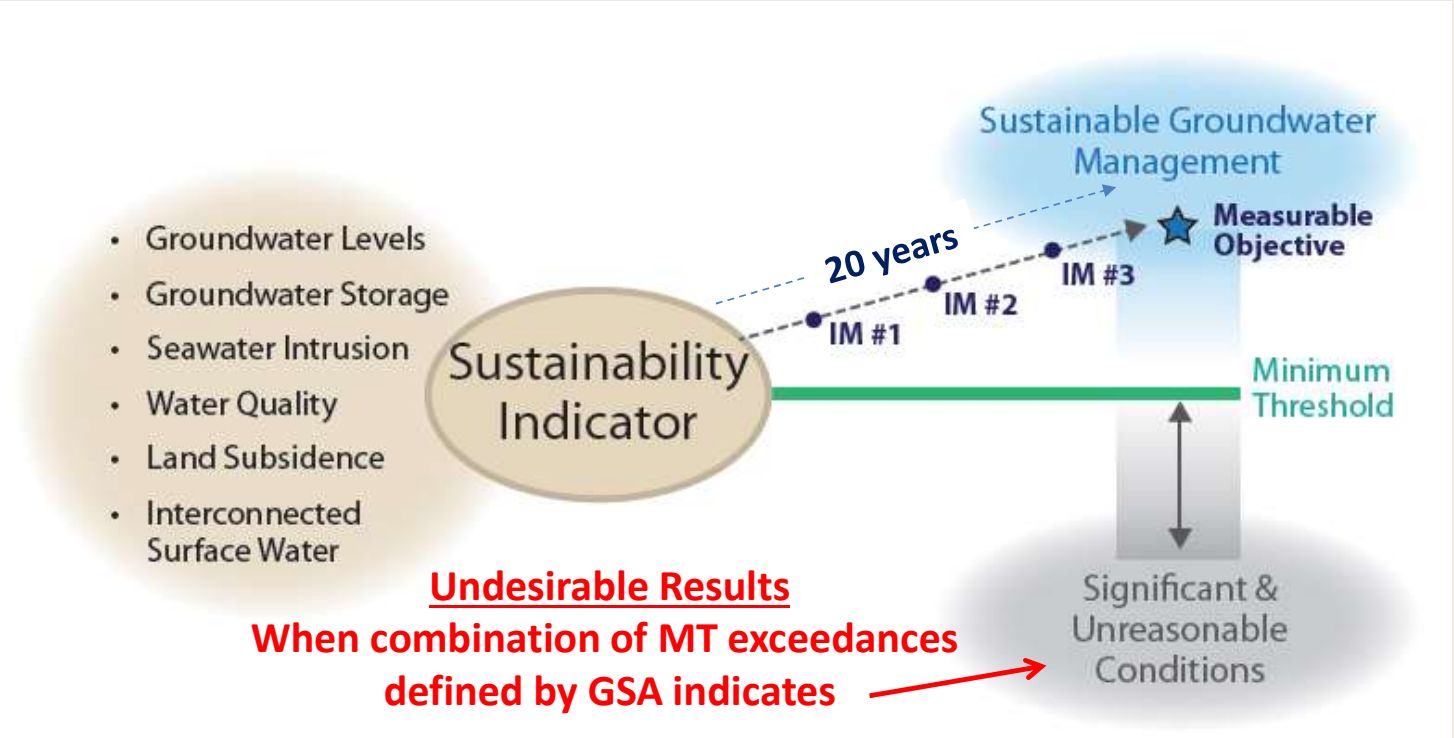
- High-level policy framework to guide development of Sustainable Management Criteria & Plan Actions
  - Draft Sustainability Goal:

...to maintain sustainable conditions in the ASRVGB thereby supporting beneficial use and users of groundwater in the ASRVGB, without causing undesirable conditions under future conditions. The GSA also desires to collaborate with other agencies and stakeholders within the basin to improve the groundwater quality of the ASRVGB.

DEFINING UNDESIRABLE RESULTS IS A CRITICAL STEP IN GSP DEVELOPMENT

- Qualitatively, its the effects that GSA wants to avoid:
  - Based on potential effects on the beneficial uses and users of groundwater, on land uses and property interests.
  - Not all effects are necessarily unreasonable.
- Quantitatively, URs are the combination of minimum threshold exceedance deemed to indicate URs are occurring.
- URs determined locally by GSA in consultation with stakeholders and public input.

RELATIONSHIP BETWEEN MT/MO, UNDESIRABLE RESULTS, AND SUSTAINABLE MANAGEMENT

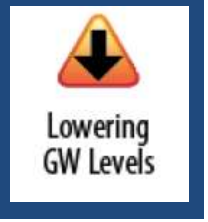


MT/MO METRICS

Sustainability Indicators	Lowering GW Levels	Reduction of Storage	Seawater Intrusion	Degraded Quality	Land Subsidence	Surface Water Depletion
Metric(s) Defined in GSP Regulations	• Groundwater Elevation	• Total Volume *	• Chloride concentration isocontour *	• Migration of Plumes • Number of supply wells • Volume • Location of isocontour *	• Rate and Extent of Land Subsidence *	• Volume or rate of surface water depletion *

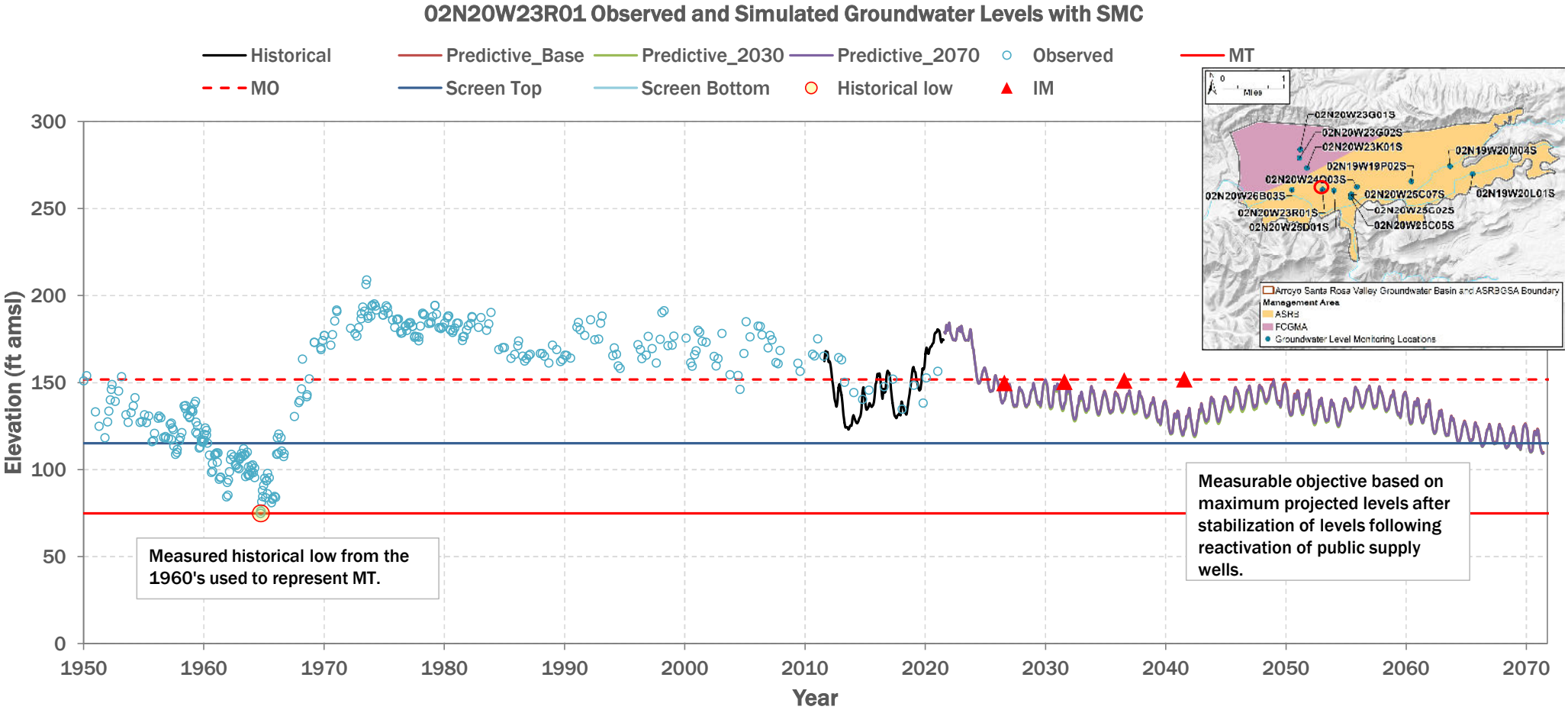
**Groundwater elevation may be used as a proxy.*

CHRONIC LOWERING OF GROUNDWATER LEVELS



- Undesirable Results:
  - Qualitative: Prevent "depletion of supply" for M&I, Agriculture and Domestic Uses (no GDEs in the basin) wells in the basin
  - Quantitative: MTs exceeded in >50% of monitoring wells in either management areas for 2 consecutive years
- Minimum Threshold is set to historical low groundwater elevations (observed or estimated)
- Measurable Objective is set to projected maximum modeled groundwater elevation after Camrosa WD Conejo wellfield resumes regular operations

EXAMPLE HYDROGRAPH SHOWING SMC



REDUCTION OF GROUNDWATER STORAGE

- Groundwater levels and storage are directly related

- SMC for Chronic Lower of Groundwater Levels sustainability indicator will be used as a proxy for the Reduction of Groundwater Storage sustainability indicator.

DEGRADATION OF WATER QUALITY

- SGMA only requires GSAs to address groundwater quality degradation that is caused by groundwater pumping or GSP projects.
- Groundwater quality issues are <u>not</u> caused by pumping.
  - Minimum threshold exceedances will only be deemed a GSA issue if the GSAs determine that groundwater pumping and/or GSP project(s) were the causal factor.
  - Measurable Objectives are set equal to minimum thresholds because pumping is not influencing water quality
- SMCs include a "Secondary" Measurable Objective set as an aspirational goal to improve water quality for the Basin to enhance grant eligibility.

DEGRADATION OF WATER QUALITY SMC

Constituent	MCL (mg/L)	Sec. MCL (R/U/ST)[1] (mg/L)	RWQCB WQO (mg/L)	Average Conc. Representative Monitoring Wells Last 10 Years (mg/l)	Minimum Threshold[2] (mg/L)	Minimum Threshold Rationale	Measure Objective[3] (mg/L)	Secondary MO[4] (mg/L)	Measurable Objective Rationale
Nitrate	10	N/A	10	13.1	23.4	Preserve ability to blend with imported water for potable uses. Reduce reliance on imported water for blending.	23.4	10	Preserve ability to blend with imported water for potable uses. Reduce reliance on imported water for blending.
TCP	5 (ng/L)	N/A	N/A	13 (ng/L)	250 (ng/L)	Practical limit of concentration for economical carbon change-out frequency of the GAC system.	250 (ng/L)	5 (ng/L)	Practical limit of concentration for economical carbon change-out frequency of the GAC system.
TDS	N/A	500/1,000/1,500	900	858	1,040	Preserve existing water quality for agricultural, municipal, and industrial beneficial uses	1,040	900	Preserve existing water quality for agricultural, municipal, and industrial beneficial uses.
Sulfate	N/A	250/500/600	300	152	300	Preserve existing water quality for municipal beneficial use.	300	225	Preserve existing water quality for municipal beneficial use.
Chloride	N/A	250/500/600	150	141	180	Preserve existing water quality for agricultural beneficial use. MO is selected to preserve existing water quality.	180	150	Preserve existing water quality for agricultural beneficial use. MO is selected to preserve existing water quality.
Boron	N/A	N/A	1	0.2	1	Preserve existing water quality for agricultural beneficial use. MO is selected to preserve existing water quality.	1.0	0.4	Preserve existing water quality for agricultural beneficial use. MO is selected to preserve existing water quality.

Notes:

1 Consumer Acceptance Levels, where R = Recommended, U = Upper, and ST = Short Term.

2 Undesirable results are considered to occur when all representative monitoring wells in a principal aquifer exceed the minimum threshold concentration for a constituent for two consecutive years.

3 Sustainability Goal for degraded water quality for a given constituent is considered to be met when the two-year running average concentration for at least one representative monitoring well is below the measurable objective.

4 Secondary MO set as an aspirational goal for the Basin for the purpose of improving overall conditions in the Basin per 354.30(g).

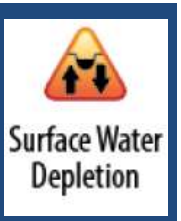
MCL = Maximum Concentration Limit

mg/L = milligrams per liter

LAND SUBSIDENCE

- Historical data do not indicate that land subsidence is an issue.
- Inelastic (irreversible) land subsidence is generally believed to not occur unless groundwater levels decline below the lowest historical level.
- Since the SMCs for chronic lowering of groundwater levels are based on historical low levels, they can be used as a proxy for land subsidence SMC.
- InSAR satellite data will also be reviewed annually.

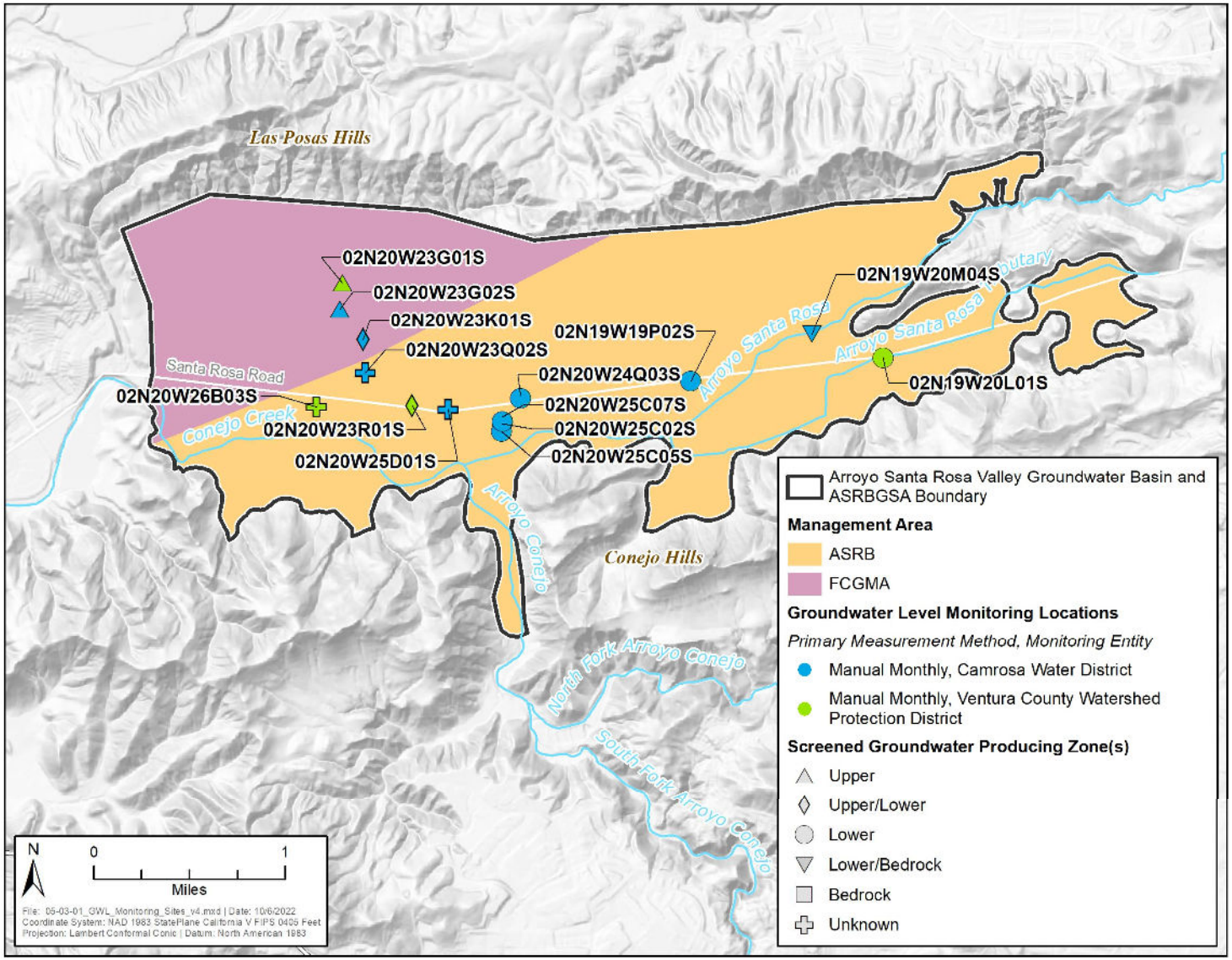
DEPLETION OF INTERCONNECTED SURFACE WATER



- Undesirable Results:
  - Qualitative: Significant and unreasonable impact to diversions and surface water dependent riparian vegetation
  - Quantitative: Same as MTs exceedance because only one MT
- Minimum Threshold is set based on the estimated maximum depletion (estimated using numerical model)
  - Historical deletion ranges up to 1,150 AFY
- Measurable Objective is same as MT because not much variability in depletion rates year to year

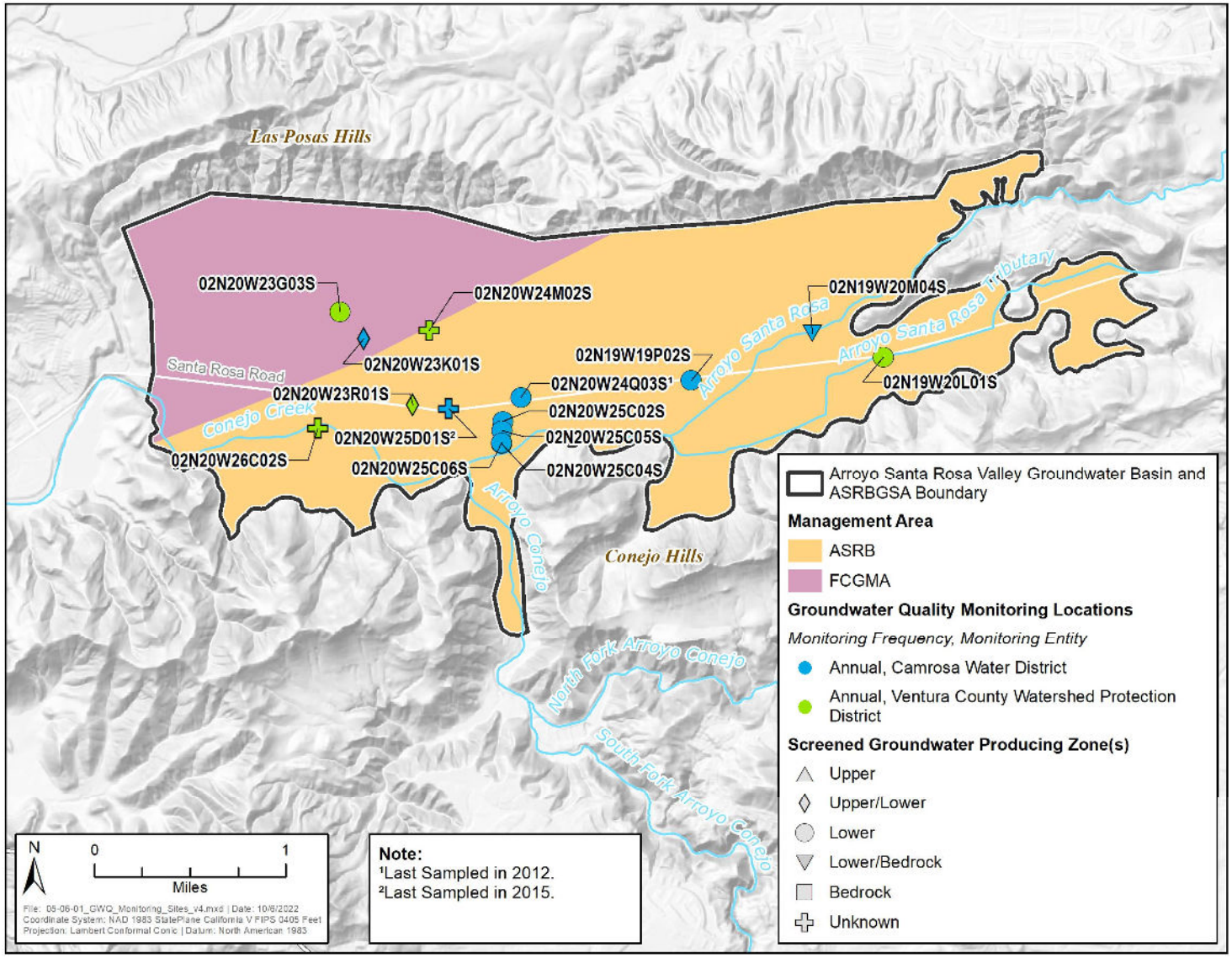
SECTION 5
MONITORING NETWORKS

- Monitoring networks required to track basin conditions and evaluate sustainable management criteria:
  - Groundwater Levels
  - Groundwater Quality
  - Surface Water Flow
  - Land Subsidence



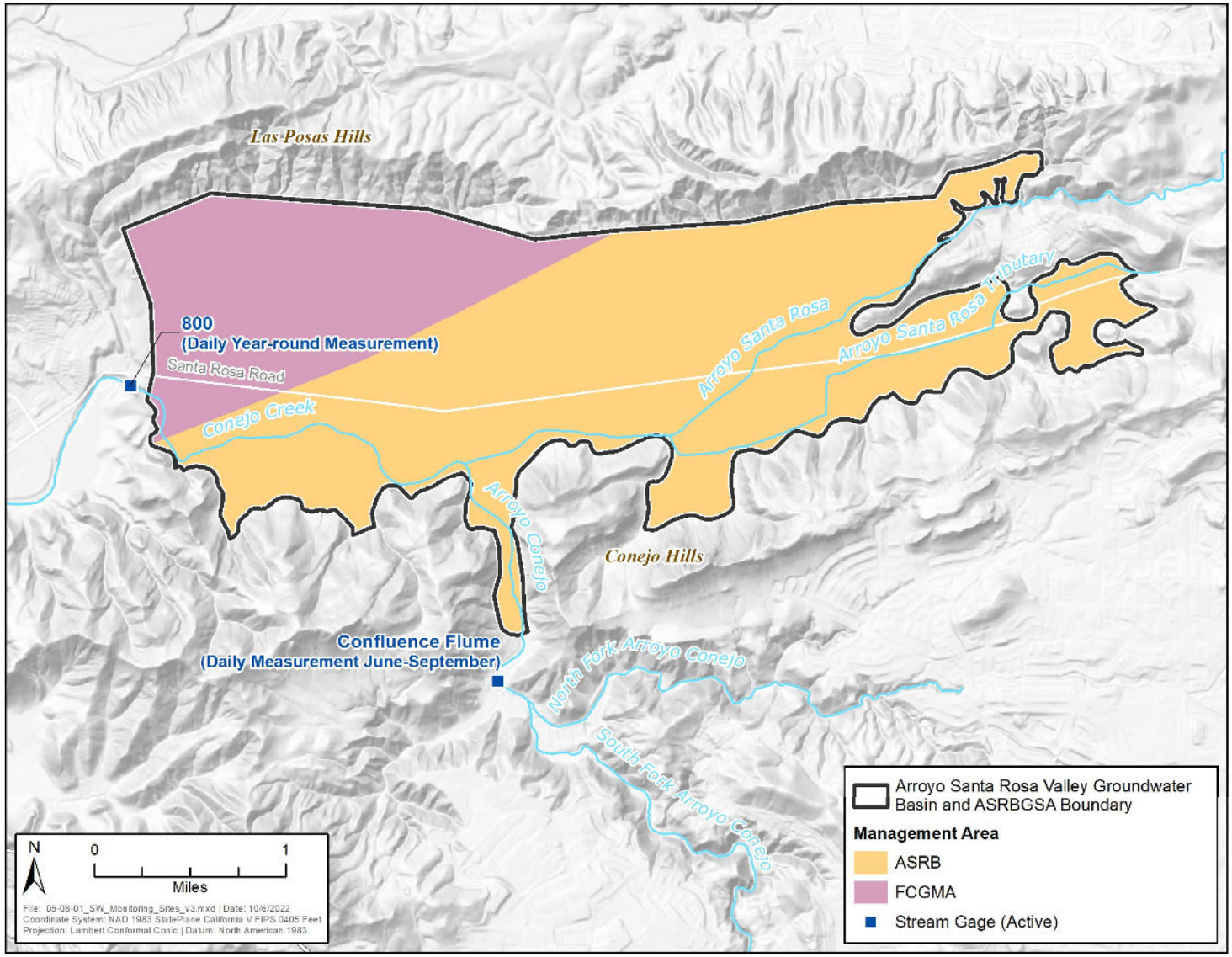
GROUNDWATER LEVEL MONITORING NETWORK

- 14 Locations:
  - FCGMA Area: 3
  - ASRBGSA Area: 11
- Monitoring Entities:
  - VCWDP: 3
  - Camrosa WD: 11
- Monitoring Frequency:
  - VCWDP: Quarterly
  - Camrosa WD: Monthly



GROUNDWATER QUALITY MONITORING NETWORK

- 14 Locations:
  - FCGMA Area: 2
  - ASRBGSA Area: 12
- Monitoring Entities:
  - VCWDP: 5
  - Camrosa WD: 9
- Monitoring Frequency:
  - Annual, some monthly



SURFACE WATER FLOW MONITORING NETWORK

- Arroyo Conejo & Conejo Creek are perennial
  - 2 Locations:
    - Gage 800 (TMDL Parties)
      - Year Round
    - Confluence Flume (City of TO)
      - Dry season only
- Arroyo Santa Rosa and its tributary only flow following storms - one storm event gage (not shown)

SECTION 6
PROJECTS AND MANAGEMENT ACTIONS

- Projects and/or management actions:
  - If necessary to achieve sustainable management
  - If desired to increase basin yield or improve water quality

PROJECTS AND MANAGEMENT ACTIONS

- 4 projects proposed:
  - 1 required by SGMA
  - 3 included to meet sustainability goal to improve water quality

PROJECT NO. 1: GROUNDWATER MONITORING NETWORK ENHANCEMENT PROJECT

- Survey monitoring wells (SGMA req.)
- Determine construction of monitoring wells where unknown (SGMA req.)
- Research existing wells in areas of limited coverage for potential addition to monitoring networks
- Pursue access agreements and add wells to monitoring network, as possible.
- Estimated Cost: $180K

PROJECT NO. 2:
WATER QUALITY MANAGEMENT COORDINATION

- Coordinate and support others' efforts to manage groundwater quality in the Basin:
  - Camrosa Water District
  - Ventura County land use planning and permitting re: horse manure management
  - MS4
  - TMDLs
  - Agricultural Waiver
- Estimated Cost: $5,000 / yr.

PROJECT NO. 3:
SANTA ROSA BASIN DESALTER PROJECT

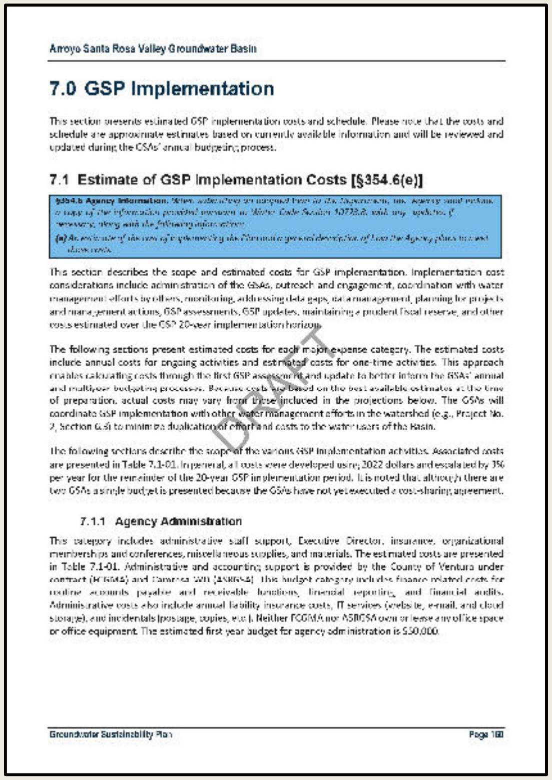
- Contributes to sustainability goal by:
  - Removing salts and nitrate from the basin
  - Improving water quality at point of use
- Non-GSP benefits
  - Reduces dependency on imported water for blending
  - Helps stabilize water rates
- Estimated Cost: N/A - Would likely be funded by grants and Camrosa

PROJECT NO. 4:
SANTA ROSA BASIN RECHARGE PROJECT

- Recharge the Basin with non-potable surface water and/or recycled water near Conejo Wellfield and/or other locations
- Two limited studies of area near Conejo Wellfield indicate basin yield could potentially be increased by ~1,000 AFY
- Limited information is available, so GSP will describe this project at a very high level
- Estimated Cost: N/A - Would likely be funded by grants and Camrosa

SECTION 7
GSP IMPLEMENTATION

- Includes:
  - Implementation tasks
    - Administration, Legal, Outreach
    - Annual Monitoring and Reporting
    - GSP 5-Yr Evaluations/Updates
    - Financial Reserve
  - Schedule for next 20 years
  - Estimated Costs: $6.2M over 20 years



7.0 GSP Implementation

This section presents estimated GSP implementation costs and schedule. Please note that the costs and schedule are approximate estimates based on currently available information and will be reviewed and updated during the GSAs' annual budgeting process.

7.1 Estimate of GSP Implementation Costs [§354.6(e)]

§354.6 Agency Information. [illegible]

(e) [illegible]

This section describes the scope and estimated costs for GSP implementation. Implementation cost considerations include administration of the GSAs, outreach and engagement, coordination with water management efforts by others, monitoring, addressing data gaps, data management, planning for projects and management actions, GSP assessments, GSP updates, maintaining a prudent fiscal reserve, and other costs estimated over the GSP 20-year implementation horizon.

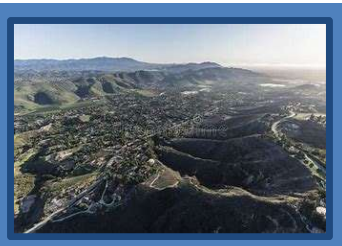
The following sections present estimated costs for each major expense category. The estimated costs include annual costs for ongoing activities and estimated costs for one-time activities. This approach enables calculating costs through the first GSP assessment and update to better inform the GSAs' annual and multiyear budgeting processes. Because costs are based on the best available estimates at the time of preparation, actual costs may vary from those included in the projections below. The GSAs will coordinate GSP implementation with other water management efforts in the watershed (e.g., Project No. 2, Section 6.5) to minimize duplication of effort and costs to the water users of the Basin.

The following sections describe the scope of the various GSP implementation activities. Associated costs are presented in Table 7.1-01. In general, all costs were developed using 2022 dollars and escalated by 3% per year for the remainder of the 20-year GSP implementation period. It is noted that although there are two GSAs a single budget is presented because the GSAs have not yet executed a cost-sharing agreement.

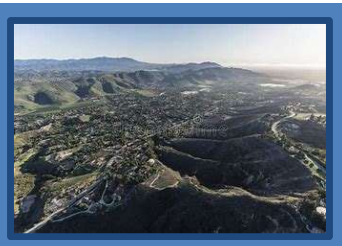
7.1.1 Agency Administration

This category includes administrative staff support, Executive Director, insurance, organizational memberships and conferences, miscellaneous supplies, and materials. The estimated costs are presented in Table 7.1-01. Administrative and accounting support is provided by the County of Ventura under contract (FCGMA) and Camrosa WD (ASRGSA). This budget category includes finance related costs for routine accounts payable and receivable functions, financial reporting, and financial audits. Administrative costs also include annual liability insurance costs, IT services (website, e-mail, and cloud storage), and incidentals (postage, copies, etc.). Neither FCGMA nor ASRGSA own or lease any office space or office equipment. The estimated first year budget for agency administration is $50,000.

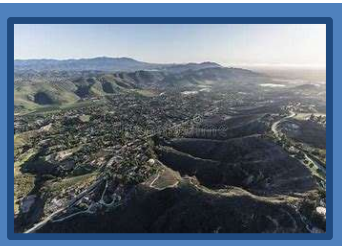
STAKEHOLDER Q&A & COMMENTS



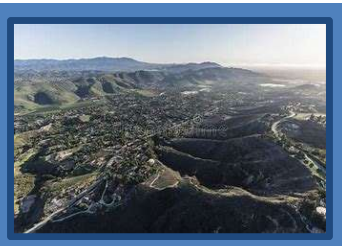
EXECUTIVE DIRECTOR AND BOARD MEMBER COMMENTS



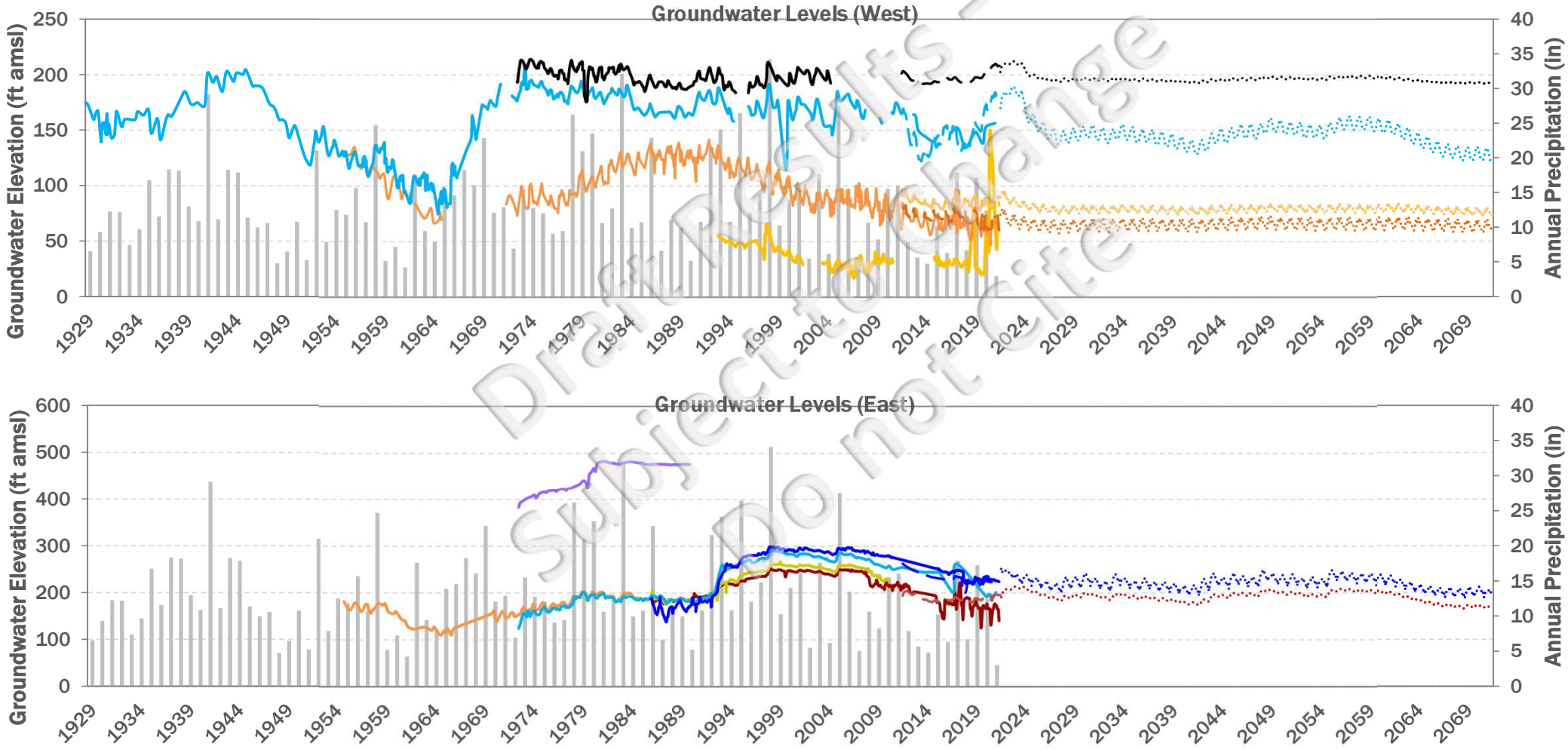
WRAP UP
THANK YOU FOR PARTICIPATING!



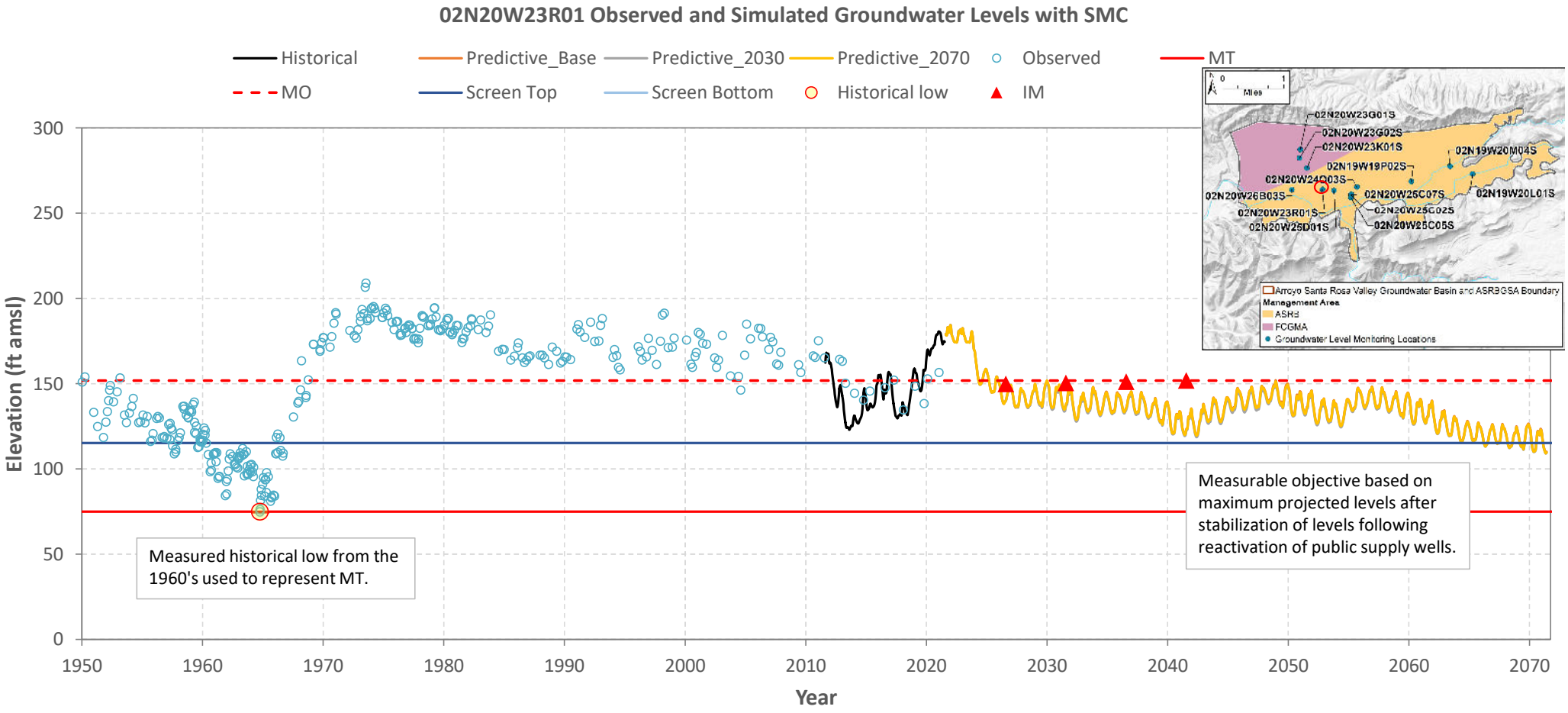
EXTRA SLIDES



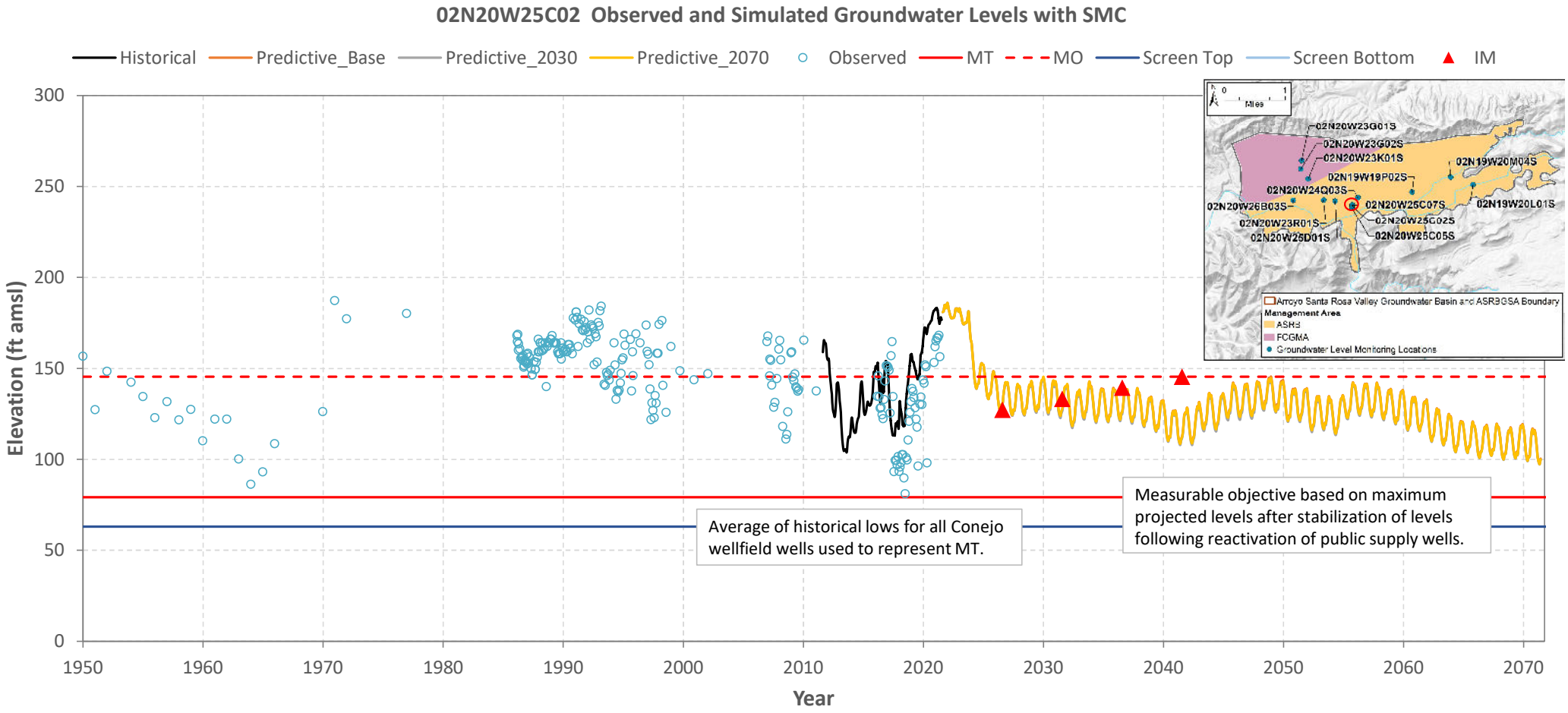
HISTORICAL AND PROJECTED GROUNDWATER LEVELS



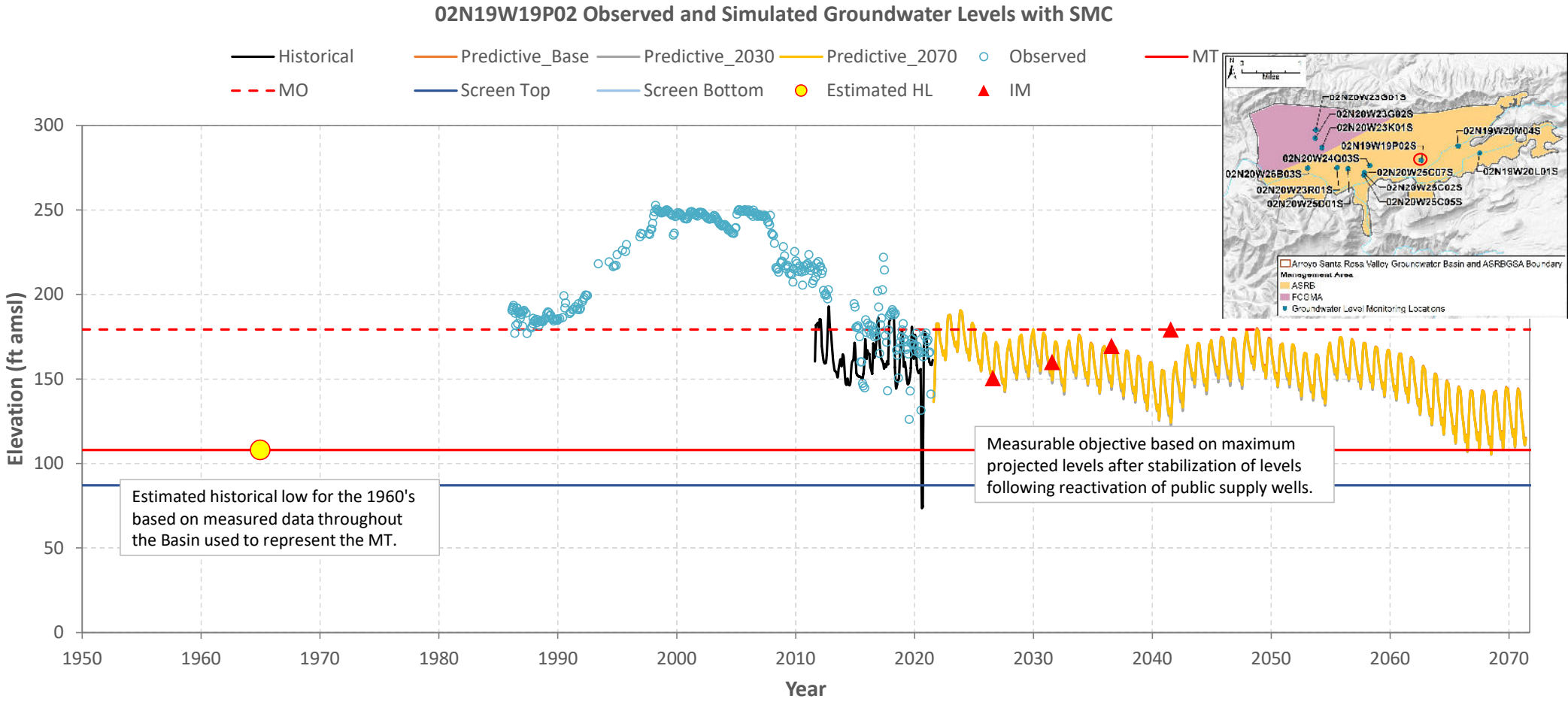
Example Hydrograph in ASR Management Area



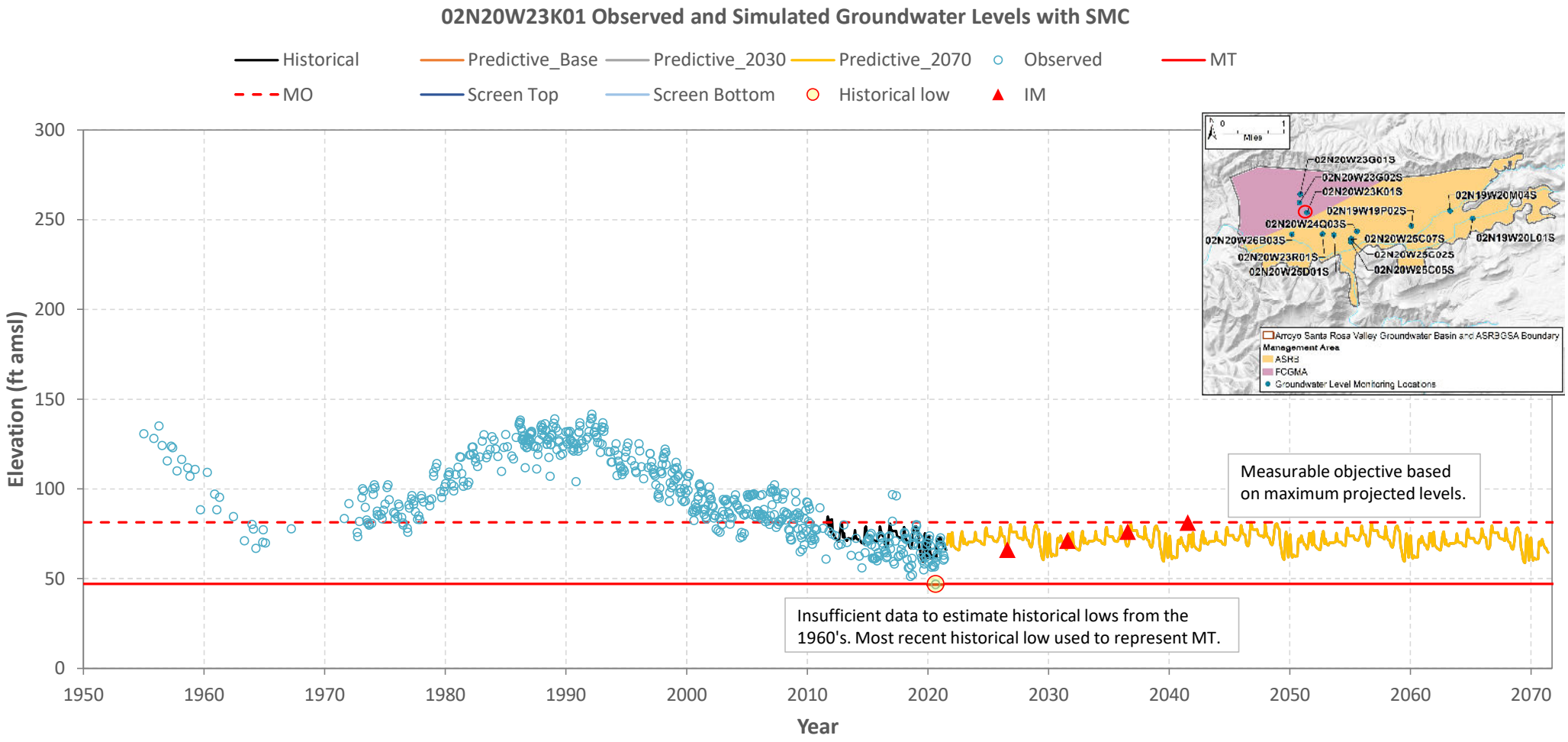
Example Hydrograph in ASR Management Area



Example Hydrograph in ASR Management Area

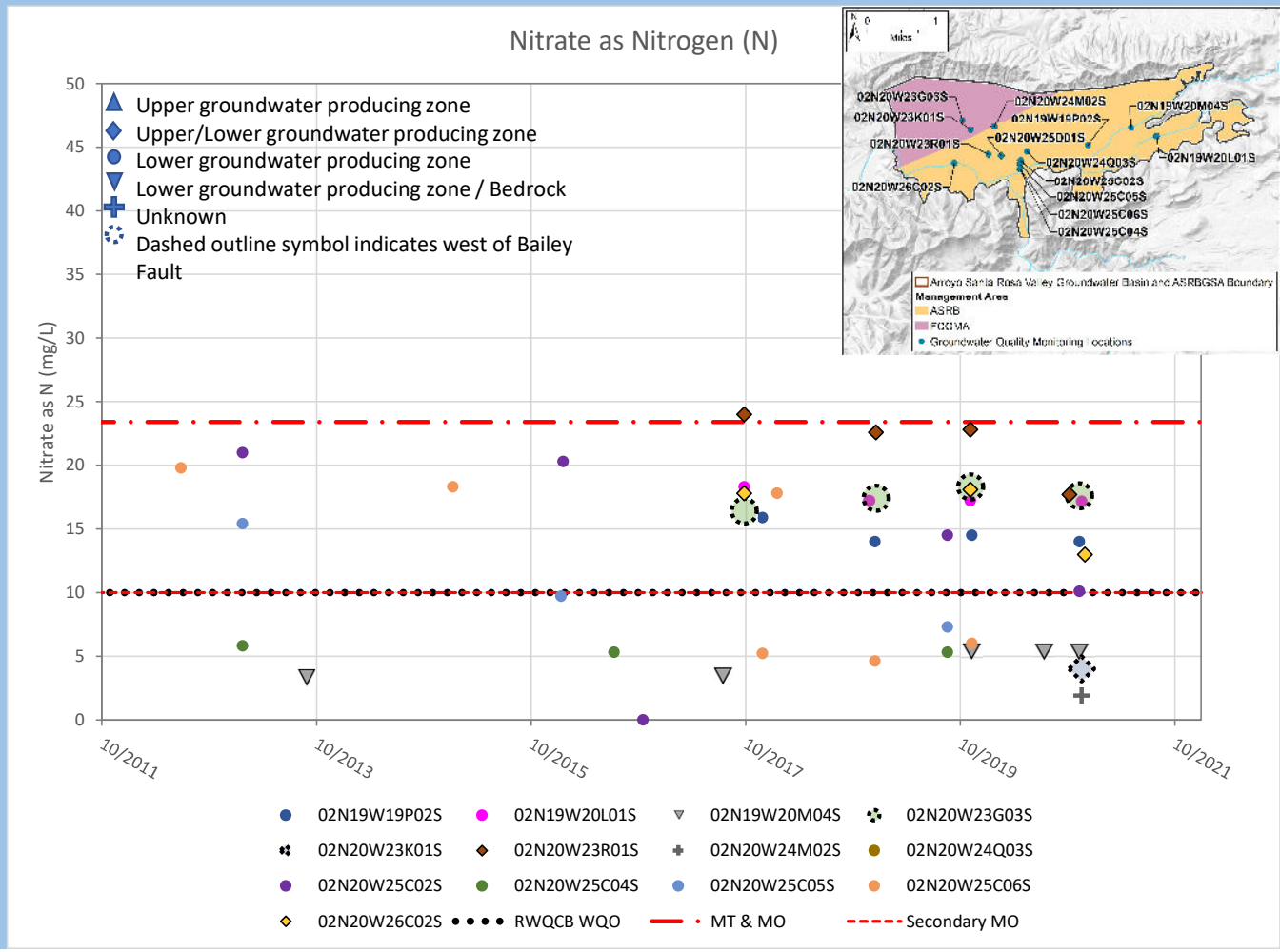


Example Hydrograph in GMA Management Area



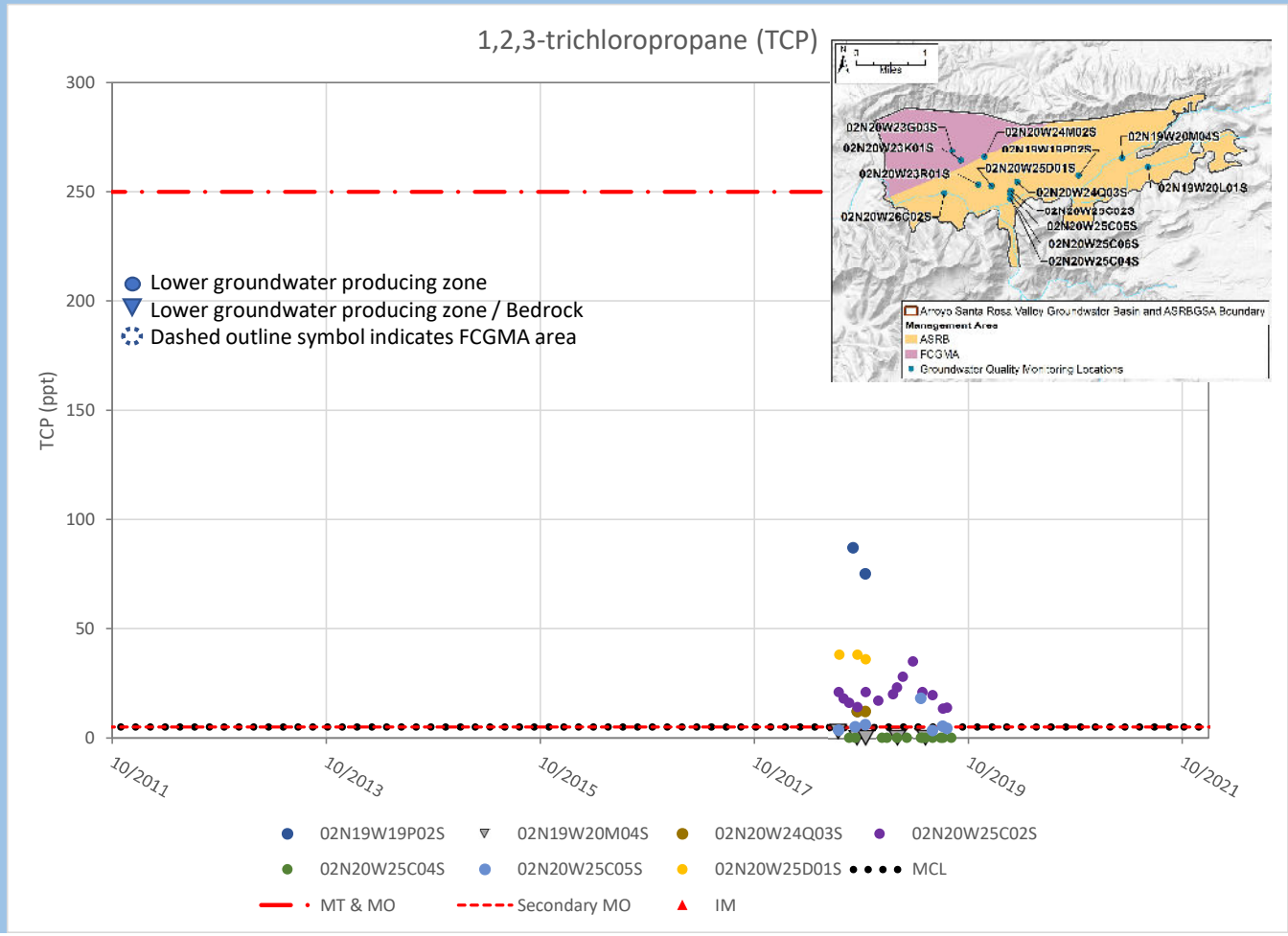
Nitrate SMC

- Undesirable Results
  - Qualitative: WQ that makes blending economically infeasible.
  - Quantitative: Average concentration in either management area exceeds MT more than two years and caused by pumping or GSP
- MT and MO set at the blending infeasibility concentration.
- Secondary MO = MCL



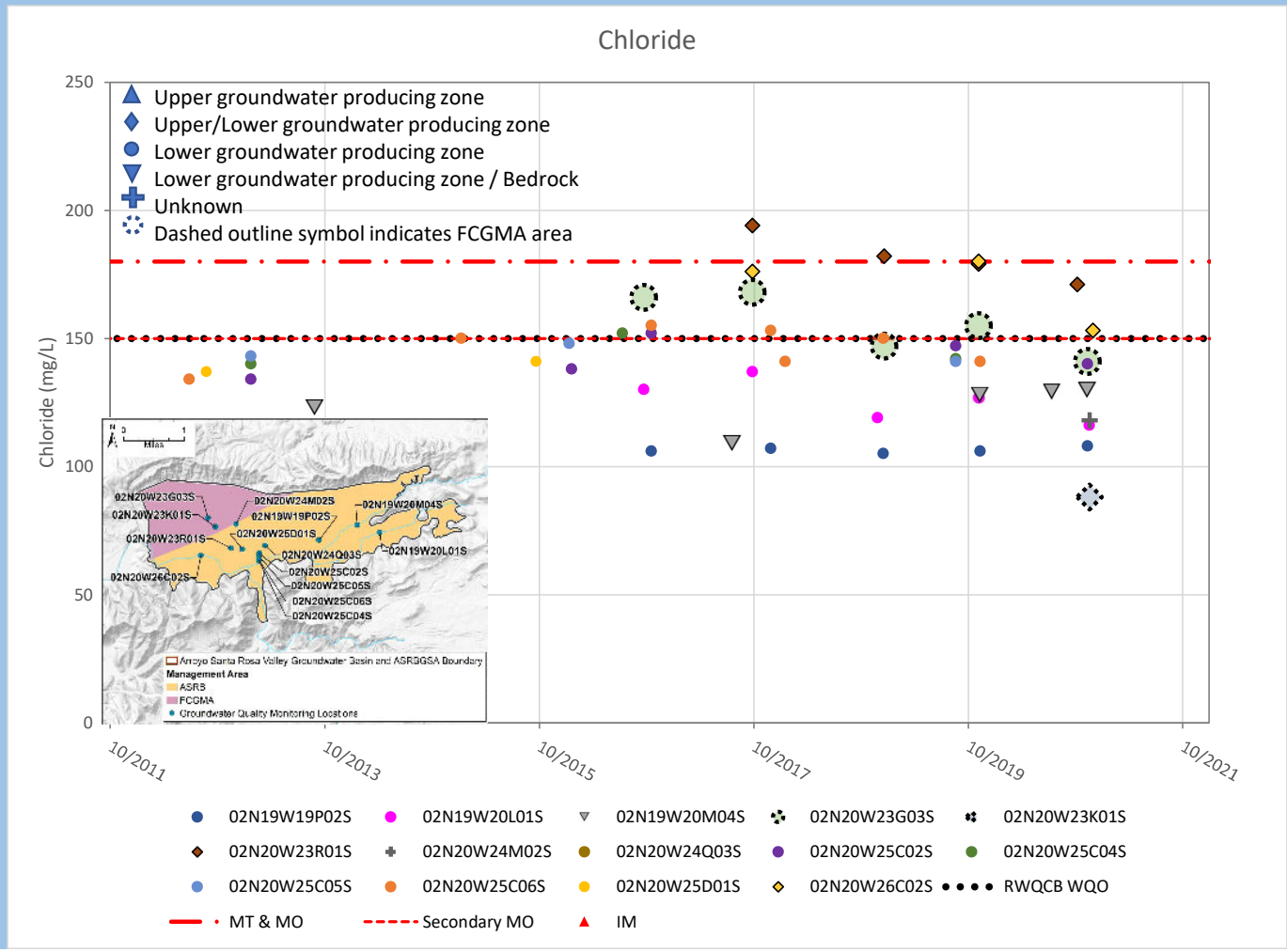
TCP SMC

- Undesirable Results
  - Qualitative: WQ that makes treatment economically infeasible.
  - Quantitative: Average concentration in either management area exceeds MT more than two years and caused by pumping or GSP
- MT and MO set at the treatment infeasibility concentration.
- Secondary MO = MCL



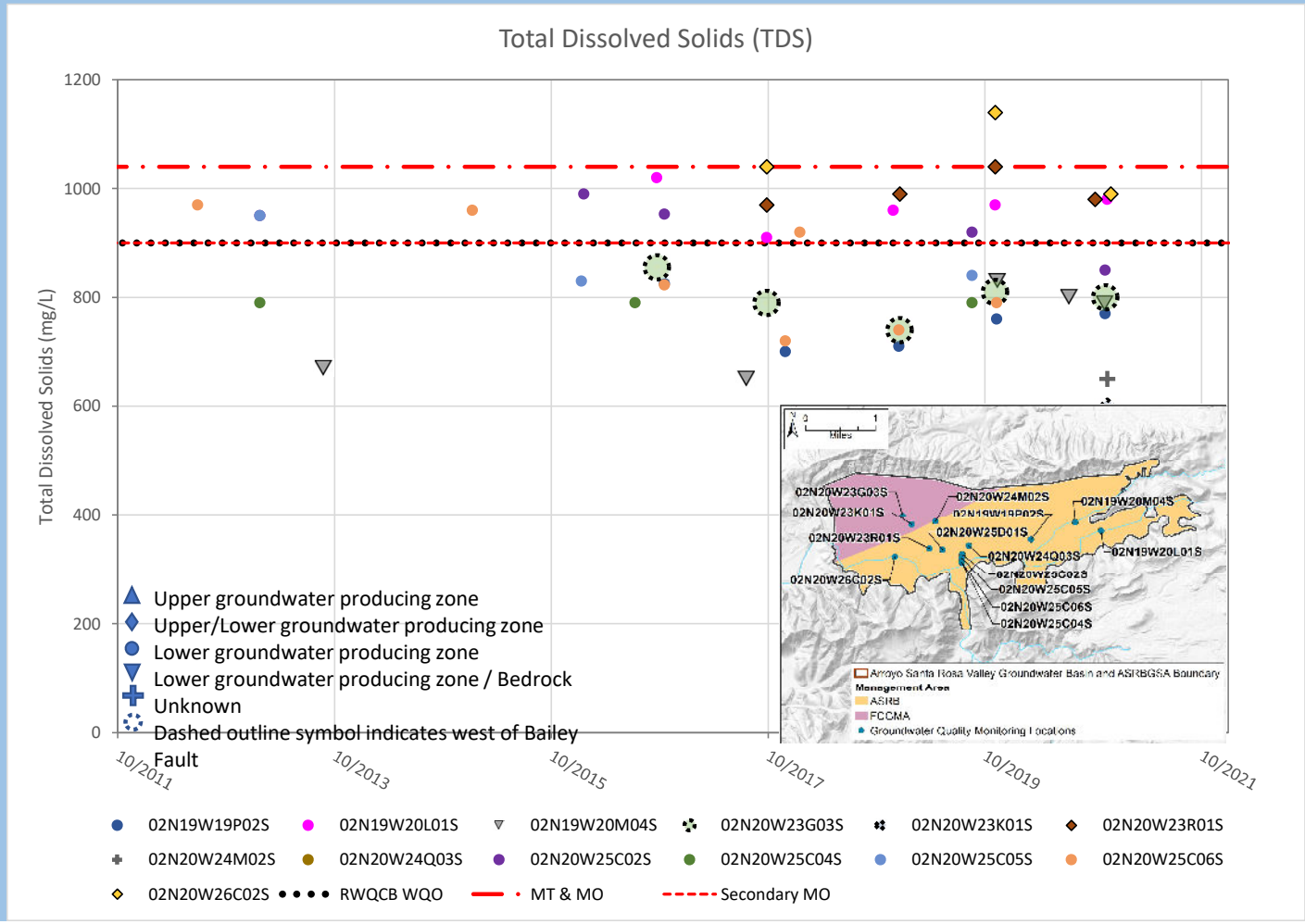
Chloride SMC

- Undesirable Results
  - Qualitative: Further degradation of WQ that increases demand for blending water.
  - Quantitative: Average concentration in either management area exceeds MT more than two years and caused by pumping or GSP
- MT and MO set at an upper range of concentrations during past 10 years.
- Secondary MO = WQO



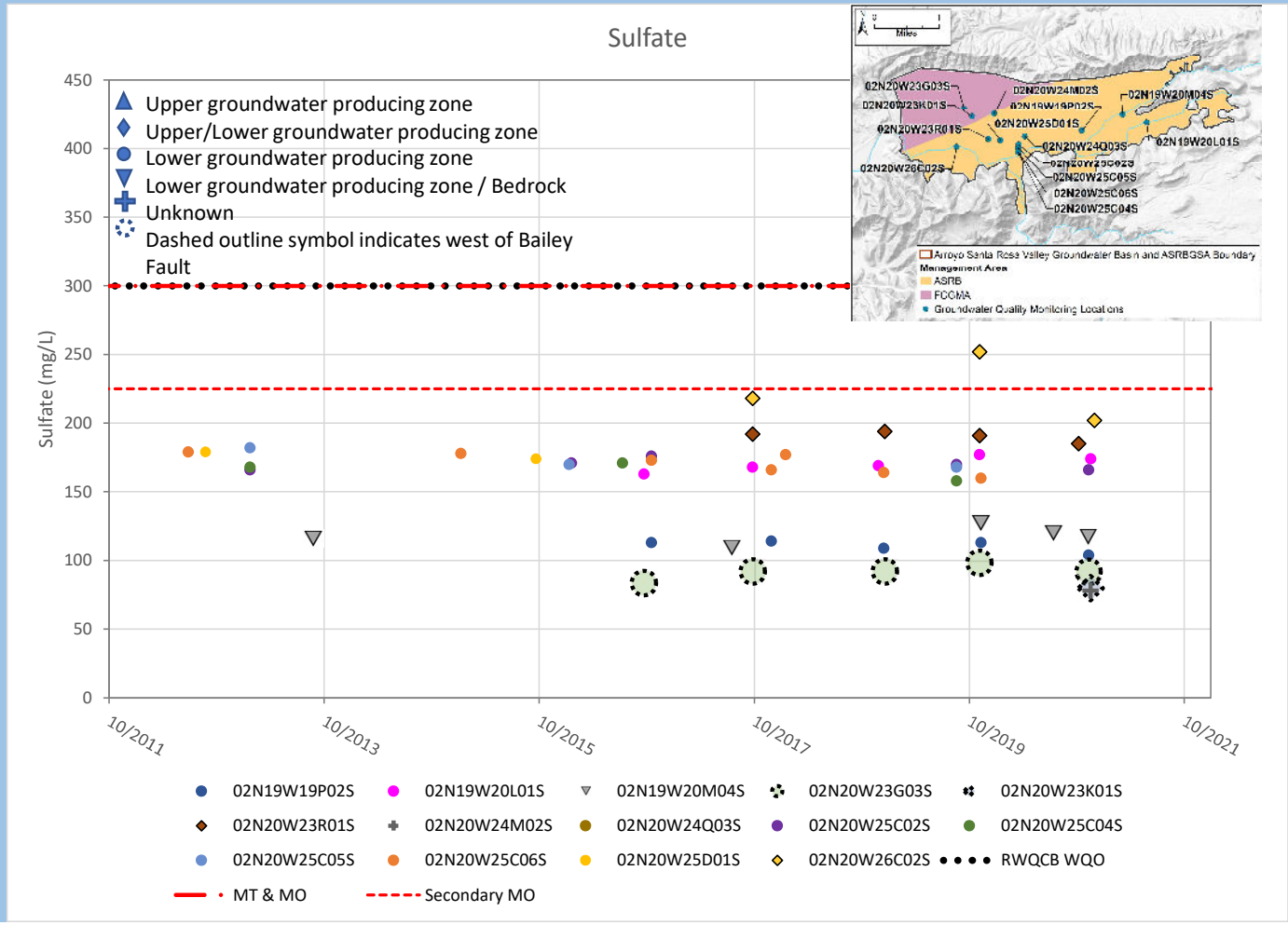
TDS SMC

- Undesirable Results
  - Qualitative: Further degradation of WQ that increases demand for blending water.
  - Quantitative: Average concentration in either management area exceeds MT more than two years and caused by pumping or GSP
- MT and MO set at an upper range of concentrations during past 10 years.
- Secondary MO = WQO



Sulfate SMC

- Undesirable Results
  - Qualitative: Further degradation of WQ.
  - Quantitative: Average concentration in either management area exceeds MT more than two years and caused by pumping or GSP
- MT and MO set at WQO.
- Secondary MO set at an upper range of concentrations during past 10 years



Boron SMC

- Undesirable Results
  - Qualitative: Further degradation of WQ.
  - Quantitative: Average concentration in either management area exceeds MT more than two years and caused by pumping or GSP
- MT and MO set at WQO.
- Secondary MO set at an upper range of concentrations during past 10 years