

6 Plan Implementation

The adoption of the GSP will be the official start of the Plan Implementation. The EKGSA will continue its efforts to engage the public and secure the necessary funding to successfully monitor and manage groundwater resources in a sustainable manner. While the GSP is being reviewed by DWR, the EKGSA will coordinate with various stakeholders and beneficial users to improve the monitoring networks and begin the implementation process for projects and management actions.

6.1 Estimate of GSP Implementation Costs

Legal Requirements:

§ 354.6. Agency Information

When submitting an adopted Plan to the Department, the Agency shall include a copy of the information provided pursuant to Water Code Section 10723.8, with any updates, if necessary, along with the following information:

(e) An estimate of the cost of implementing the Plan and a general description of how the Agency plans to meet those costs.

The EKGSA preliminary estimate of plan implementation costs includes four categories:

1. *GSA Administration*
2. *Ongoing GSP Implementation*
3. *Plans to Fill Data Gaps*
4. *Projects & Management Actions*

GSA Administration

This includes the costs of annually operating the EKGSA including, but not limited to, the executive officer's salary, audit, legal counsel, insurance, and potentially office space. The extent of administrative costs will be impacted by the direction the EKGSA follows in the years ahead. The EKGSA is utilizing a shared staff model where all labor for executive leadership, engineer, analyst, and administration are shared with a member agency. In the future, the EKGSA can evaluate moving to a hired executive staff model where all labor for executive leadership and administration costs, and all other work is performed by consultants. The current costs, estimated using the shared staff model currently in use, is approximately \$211,000 annually.

Ongoing GSP Implementation

The ongoing costs of GSP implementation include, but are not limited to, basin coordination/policy development, engineering, outreach, monitoring, annual reporting, and data collection for 5-year updates. The expected implementation costs may vary based on EKGSA staffing and/or policy decisions in the future. Costs are estimated using the existing shared staff model and is approximately \$856,100 annually.

Plan to Fill Data Gaps (One-Time Cost)

Proper implementation of this GSP, especially as it relates to execution of projects and management actions, is contingent upon filling current data gaps. This process will require determining which measures are necessary to build and maintain a comprehensive assessment of the water budget and ultimately verify groundwater sustainability. This plan to fill data gaps includes, but is not limited to, installing stream gauges, dedicated monitoring wells, and conducting a Proposition 218 vote. Costs are estimated to be approximately \$1,230,000.

Projects & Management Actions

Projects and management actions/programs will be required to achieve groundwater sustainability. Estimated costs generally include planning, design, and construction of infrastructure. The project costs listed are estimates and may be adapted, added to, or eliminated by the EKGSA Board should it be deemed necessary. The funding

for projects and management actions will likely come from specific project proponents and/or beneficiaries. Thus, these costs are not included in **Table 6-1** summarizing the EKGSA implementation costs. Further discussion regarding projects and their individual components, as well as their estimated timelines can be found in the Projects and Management Actions Chapter (**Chapter 5**).

Table 6-1 Estimated EKGSA Implementation Costs

Initial GSP Implementation Budget	
Activity	Est. Budget
GSA Administration	
Executive Leadership (Executive/Analyst)	\$ 125,000
Administration	30,000
Office Space and Correlated Costs	-
Legal	35,000
Engineering (Gov.)	5,000
Auditing	5,000
Insurance	6,000
Miscellaneous	5,000
Total GSA Administration	\$ 211,000
GSP Implementation	
Basin Coordination/Policy Development	\$ 100,000
Engineering	190,000
Outreach	10,000
Monitoring	
GW Level Monitoring (Semi Annual)	12,000
GW Quality Monitoring (Quarterly)	200,000
Subsidence Monitoring (Annual)	1,600
Satellite Imagery - Demand (Monthly)	250,000
DMS Management	15,000
Annual Reporting	2,500
Collection for For 5-year Update	75,000
Annual Ongoing GSP Imp Costs	\$ 856,100
Total Annual Costs	\$ 1,067,100
Fill Data Gaps	
Stream Gauges (5)	\$ 200,000
Dedicated Monitoring Wells (7)	525,000
Well Video Logging	175,000
Five Year Update	250,000
Prop 218	80,000
Total to Fill Data Gaps	\$ 1,230,000
Estimated GSP Implementation Costs	\$ 2,297,100

6.2 Identify Funding Alternatives

Shortly after the GSP is submitted, the EKGSA will pursue a Proposition 218 Election for securing funds for annual administration and general implementation costs associated with implementation of this GSP. The Proposition 218 Election will aim to establish a maximum rate in a given fiscal year. The assessment rate will be set annually by the GSA Board, based on the budget needs, but will not exceed the proposed maximum rate established in the Proposition 218. At this time the assessment rate is unknown because the actual GSP implementation costs will not be fully determined until after the GSP is adopted. The projects and management actions proposed in this GSP will require supplemental funding more than the maximum potential Proposition 218 assessments. Therefore, other funding mechanism(s) will be required.

The EKGSA and/or its member agencies or other Kaweah Subbasin GSAs will apply for various grant funding opportunities to offset some of the capital costs associated with implementation of the GSP, whether it be a water supply project or to fill an existing data gap. The EKGSA will explore federal and state grant funding opportunities and low interest loans to help finance the initial steps of plan implementation.

If local, state, and federal funding is not readily available or insufficient, the EKGSA may consider implementing policies or actions to impose fees which, after formal adoption, would generate a revenue stream for future GSP implementation costs. The fees could be based on several factors including, but not limited to, allocating projects costs to project beneficiaries, estimated pumping quantities, land area, or other method as determined by the EKGSA. The EKGSA could elect to impose penalties for not meeting milestones or exceeding allocation limits. Penalty revenue could be utilized to fund projects.

6.3 Schedule for Implementation

Figure 6-1 shows the estimated timeline for project implementation starting in 2020 and spanning to 2040. It is important to note that projects may initiate at different times and the estimation of implementation may be altered by the EKGSA at any time, should it be deemed necessary. Additionally, the availability of surface water necessary for projects is subject to hydrology which is unpredictable and variable. The EKGSA plans to continue broadening its scope in attempting to obtain additional resources to be utilized by these and other projects. The depicted schedule does not list specific implementation steps (i.e. environmental documentation, agreements, project design, and construction) for each project or management action.

Figure 6-2 represents the glide path to sustainability for the EKGSA GSP, shown as a cumulative mitigation. The overall EKGSA overdraft is currently estimated to be approximately 28,000 acre-feet prior to the development of the GSP. It is assessed that by 2025, 5% of the pre-existing overdraft value will have been resolved. In the year 2030 it is estimated that through GSP implementation 25% of the estimated overdraft will have been resolved. In 2035 the percentage jumps to 55%, with 100% of the overdraft resolved by 2040. This figure provides is an estimated projection, and actual results from both projects and management actions may differ from this expectation.

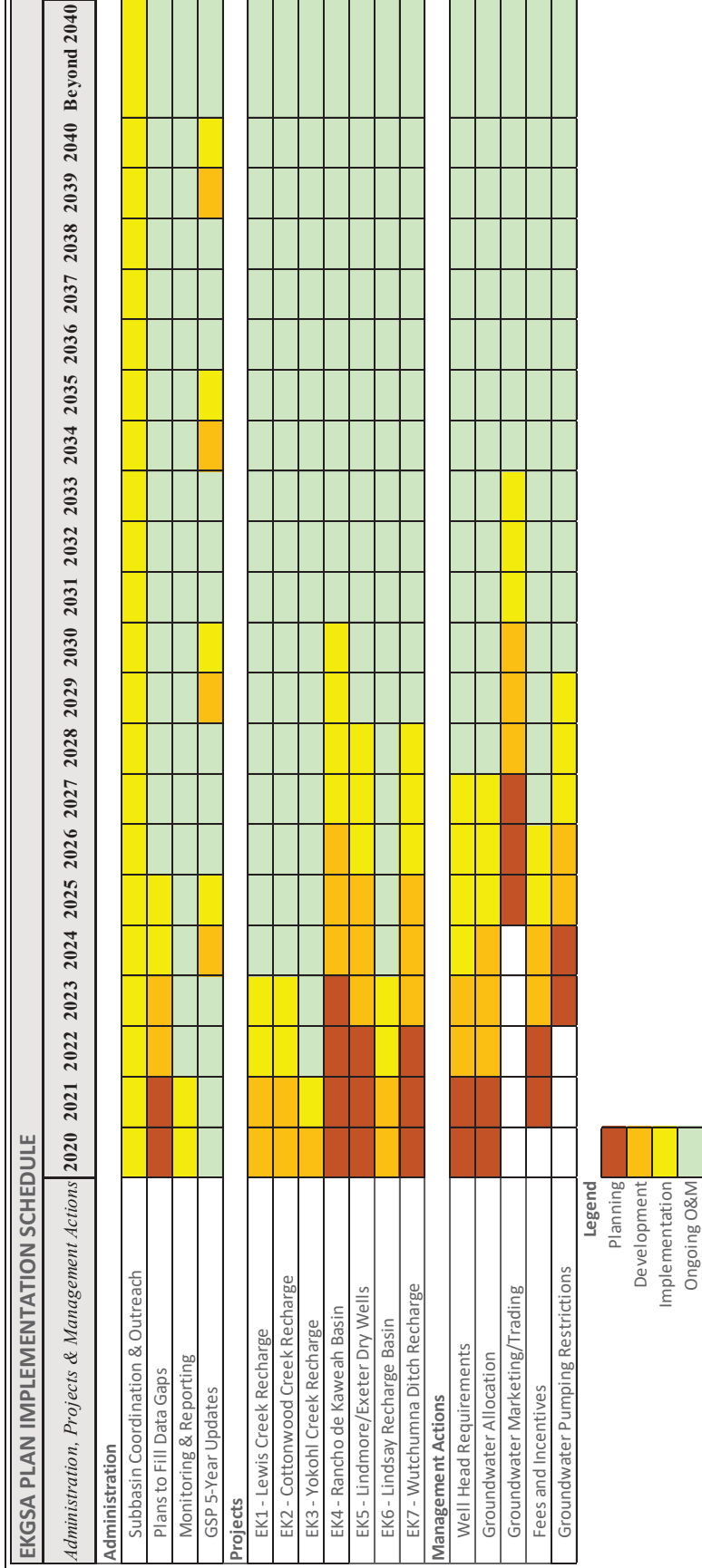


Figure 6-1 EKGS GSP Implementation Schedule



EKGSa GLIDE PATH TO SUSTAINABILITY

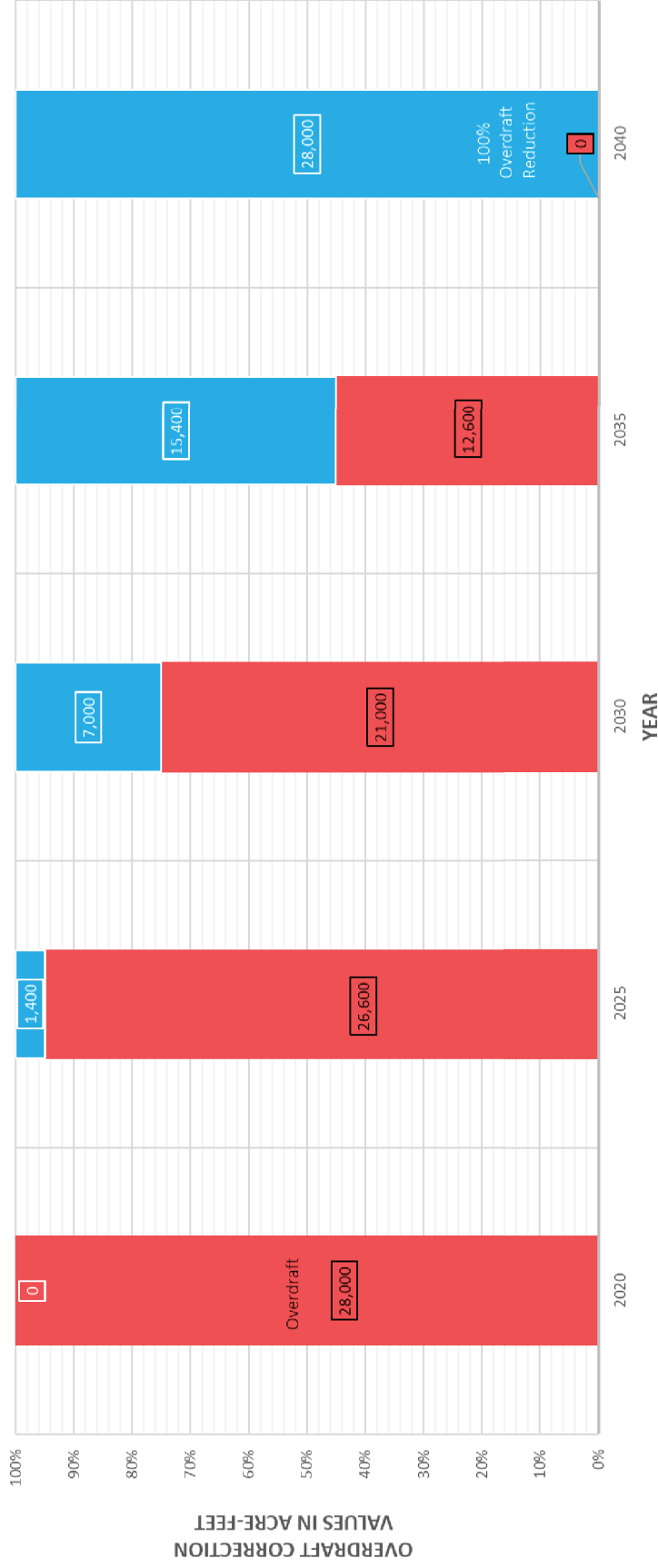


Figure 6-2 EKGSA Glide Path to Sustainability

6.4 Data Management System

The EKGSA's Data Management System (DMS) will be coordinated with all the Kaweah Subbasin GSAs. A single location for data collection, aggregation, and analysis will benefit not only the EKGSA, but all GSAs within the Kaweah Subbasin. The DMS platform, GSA management, and functionality is further defined in the Kaweah Subbasin Coordination Agreement and in [Appendix 1-A](#).

6.5 Annual Reporting

Legal Requirements:

§ 356.2. Annual Reports

Each Agency shall submit an annual report to the Department by April 1 of each year following the adoption of the Plan. The annual report shall include the following components for the preceding water year:

- (a) General information, including an executive summary and a location map depicting the basin covered by the report.
- (b) A detailed description and graphical representation of the following conditions of the basin managed in the Plan:
 - (1) Groundwater elevation data from monitoring wells identified in the monitoring network shall be analyzed and displayed as follows:
 - (A) Groundwater elevation contour maps for each principal aquifer in the basin illustrating, at a minimum, the seasonal high and seasonal low groundwater conditions.
 - (B) Hydrographs of groundwater elevations and water year type using historical data to the greatest extent available, including from January 1, 2015, to current reporting year.
 - (2) Groundwater extraction for the preceding water year. Data shall be collected using the best available measurement methods and shall be presented in a table that summarizes groundwater extractions by water use sector, and identifies the method of measurement (direct or estimate) and accuracy of measurements, and a map that illustrates the general location and volume of groundwater extractions.
 - (3) Surface water supply used or available for use, for groundwater recharge or in-lieu use shall be reported based on quantitative data that describes the annual volume and sources for the preceding water year.
 - (4) Total water use shall be collected using the best available measurement methods and shall be reported in a table that summarizes total water use by water use sector, water source type, and identifies the method of measurement (direct or estimate) and accuracy of measurements. Existing water use data from the most recent Urban Water Management Plans or Agricultural Water Management Plans within the basin may be used, as long as the data are reported by water year.
 - (5) Change in groundwater in storage shall include the following:
 - (A) Change in groundwater in storage maps for each principal aquifer in the basin.
 - (B) A graph depicting water year type, groundwater use, the annual change in groundwater in storage, and the cumulative change in groundwater in storage for the basin based on historical data to the greatest extent available, including from January 1, 2015, to the current reporting year.
- (c) A description of progress towards implementing the Plan, including achieving interim milestones, and implementation of projects or management actions since the previous annual report.

The EKGSA will develop and submit annual reports on April 1 of each year following the initial GSP (2020). The annual reports will follow the guidelines set forth in §356.2 of the SGMA legislation. Per the guidelines, there will be three key sections in the report as shown in the outline below.

1. *General Information*
 - a. *Executive Summary for the annual report*
 - b. *Location map of the region covered by the annual report*
2. *Basin Conditions*
 - a. *Groundwater elevation monitoring data, including contour maps and hydrographs*
 - b. *Groundwater extraction data*
 - c. *Surface water supply data*
 - d. *Total water use data*
 - e. *Change in groundwater storage, including maps and comparison to January 1, 2015*
3. *Progress of GSP implementation.*
 - a. *Progress on GSP implementation*
 - b. *Progress towards achieving sustainability*

6.6 Periodic Evaluations

Legal Requirements:

§ 356.4. Periodic Evaluation by Agency

Each Agency shall evaluate its Plan at least every five years and whenever the Plan is amended and provide a written assessment to the Department. The assessment shall describe whether the Plan implementation, including implementation of projects and management actions, are meeting the sustainability goal in the basin, and shall include the following:

- (a) A description of current groundwater conditions for each applicable sustainability indicator relative to measurable objectives, interim milestones and minimum thresholds.
- (b) A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions.
- (c) Elements of the Plan, including the basin setting, management areas, or the identification of undesirable results and the setting of minimum thresholds and measurable objectives, shall be reconsidered and revisions proposed, if necessary.
- (d) An evaluation of the basin setting in light of significant new information or changes in water use, and an explanation of any significant changes. If the Agency's evaluation shows that the basin is experiencing overdraft conditions, the Agency shall include an assessment of measures to mitigate that overdraft.
- (e) A description of the monitoring network within the basin, including whether data gaps exist, or any areas within the basin are represented by data that does not satisfy the requirements of Sections 352.4 and 354.34(c). The description shall include the following:
 - (1) An assessment of monitoring network function with an analysis of data collected to date, identification of data gaps, and the actions necessary to improve the monitoring network, consistent with the requirements of Section 354.38.
 - (2) If the Agency identifies data gaps, the Plan shall describe a program for the acquisition of additional data sources, including an estimate of the timing of that acquisition, and for incorporation of newly obtained information into the Plan.
 - (3) The Plan shall prioritize the installation of new data collection facilities and analysis of new data based on the needs of the basin.
- (f) A description of significant new information that has been made available since Plan adoption or amendment, or the last five-year assessment. The description shall also include whether new information warrants changes to any aspect of the Plan, including the evaluation of the basin setting, measurable objectives, minimum thresholds, or the criteria defining undesirable results.
- (g) A description of relevant actions taken by the Agency, including a summary of regulations or ordinances related to the Plan.
- (h) Information describing any enforcement or legal actions taken by the Agency in furtherance of the sustainability goal for the basin.
- (i) A description of completed or proposed Plan amendments.
- (j) Where appropriate, a summary of coordination that occurred between multiple Agencies in a single basin, Agencies in hydrologically connected basins, and land use agencies.
- (k) Other information the Agency deems appropriate, along with any information required by the Department to conduct a periodic review as required by Water Code Section 10733.

The EKGSA will amend the GSP at least every five years as prescribed in the SGMA Legislation. Periodic evaluations will include the result of Basin operations and progress in achieving sustainability. Progress will be evaluated using current groundwater conditions, status of projects or management actions, evaluation of undesirable results relating to measurable objectives and minimum thresholds, changes in the monitoring network, summary of enforcement or legal actions, and agency coordination efforts. This is in accordance with SGMA law §356.4. Periodic Evaluation by Agency.

Certain components of the GSP may be re-evaluated more frequently than every five years, if deemed necessary. This may occur, for example, if sustainability goals are not being met, additional data is acquired, or priorities change. While the EKGSA is evaluating various components of the GSP (i.e. sustainable management criteria), the EKGSA will be seeking feedback from stakeholders through a public process utilizing adequate and appropriate materials. Decisions will be made at public board meetings and coordinated at the Subbasin level, as needed. Results from these processes and any changes will be incorporated into the GSP when it is resubmitted to DWR every five years.