

NOTICE OF EXEMPTION

To: Merced County Clerk
2222 M Street
Merced, California 95340

Stanislaus County Clerk
1021 I Street, Suite 101
Modesto, California 95354

Office of Planning and Research
1400 10th Street
Sacramento, California 95814

From: East Turlock Subbasin Groundwater
Sustainability Agency
731 East Yosemite Ave., Suite B, #318
Merced, California 95340

Project Title: East Turlock Subbasin GSA Priority Action Area – ETSGSA-08

Project Location – Specific: Within the boundaries of the East Turlock Subbasin GSA (see attached Exhibit “A” for map).

Project Location – City: N/A

Project Location – County: Merced and
Stanislaus

Description of Nature, Purpose and Beneficiaries of Project:

This project is to adopt a Priority Action Area Plan (“PAA Plan”) related to a certain parcels surrounding a monitoring well referred to as “ETSGSA-08”, consistent with the East Turlock Subbasin Groundwater Sustainability Agency (“ETSGSA”)’s implementation of the Sustainable Groundwater Sustainability Act (“SGMA”) within the East Turlock Subbasin GSA’s boundaries pursuant to the Revised Turlock Subbasin Groundwater Sustainability Plan (“Revised Turlock GSP”) and the Demand Reduction Plan attached thereto as Appendix “K”. The PAA Plan is included as Exhibit B.

The PAA Plan for ETSGSA-08 is specifically intended to implement conservation measures specified in the Demand Reduction Plan to address a trend in groundwater levels decreasing below the 2027 Interim Milestone observed over a period of three years based on conditions measured at ETSGSA-08, which is designated as a representative monitoring site well in the GSP. Adoption of the PAA Plan for ETSGSA-08 will establish a designated area around ETSGSA-08 in which ETSGSA will consider implementing certain response actions and Groundwater Use Management Program Adjustments related to implementation of Rules and Regulations for groundwater use, prioritize identification and implementation of project opportunities to address groundwater level decline, conduct additional outreach and coordination efforts, and conduct monitoring and data collection. These objectives are intended to avoid undesirable results and to achieve sustainable management of groundwater within the East Turlock Subbasin GSA’s boundaries for the benefit of all beneficial users and uses of groundwater, and under the GSA’s SGMA obligations and authorities.

Name of Public Agency Approving Project: East Turlock Subbasin GSA

Name of Person or Agency Carrying Out Project: East Turlock Subbasin GSA

Exempt Status: (check one)

- Ministerial (Sec. 21080(b)(1); 15268);**
- Declared Emergency (Sec. 21080(b)(3); 15269(a));**
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));**
- Categorical Exemption. State type and section number:** Class 7 – Cal. Code Regs., tit. 14, § 15307; Class 8 – Cal. Code Regs., tit. 14, § 15308; Common Sense Exemption – Cal. Code Regs., tit. 14, § 15061, subd. (b)(3);
- Statutory Exemption. State code number:**

Reasons why project is exempt:

The adoption of the PAA Plan for ETSGSA-08 is an action taken by the East Turlock Subbasin GSA as authorized by SGMA for the protection of natural resources and the environment, which is categorically exempt pursuant to CEQA Guidelines sections 15307 and 15308.

As the PAA Plan for ETSGSA-08 does not have the potential for causing a significant effect on the environment by itself, the common sense exemption applies pursuant to CEQA Guidelines section 15061(b)(3). Separate and underlying projects and management actions will undergo CEQA analysis as required.

Lead Agency

Contact Person: Mike Tietze **Area Code/Telephone/Ext:** (916) 200-9038

If filed by applicant:

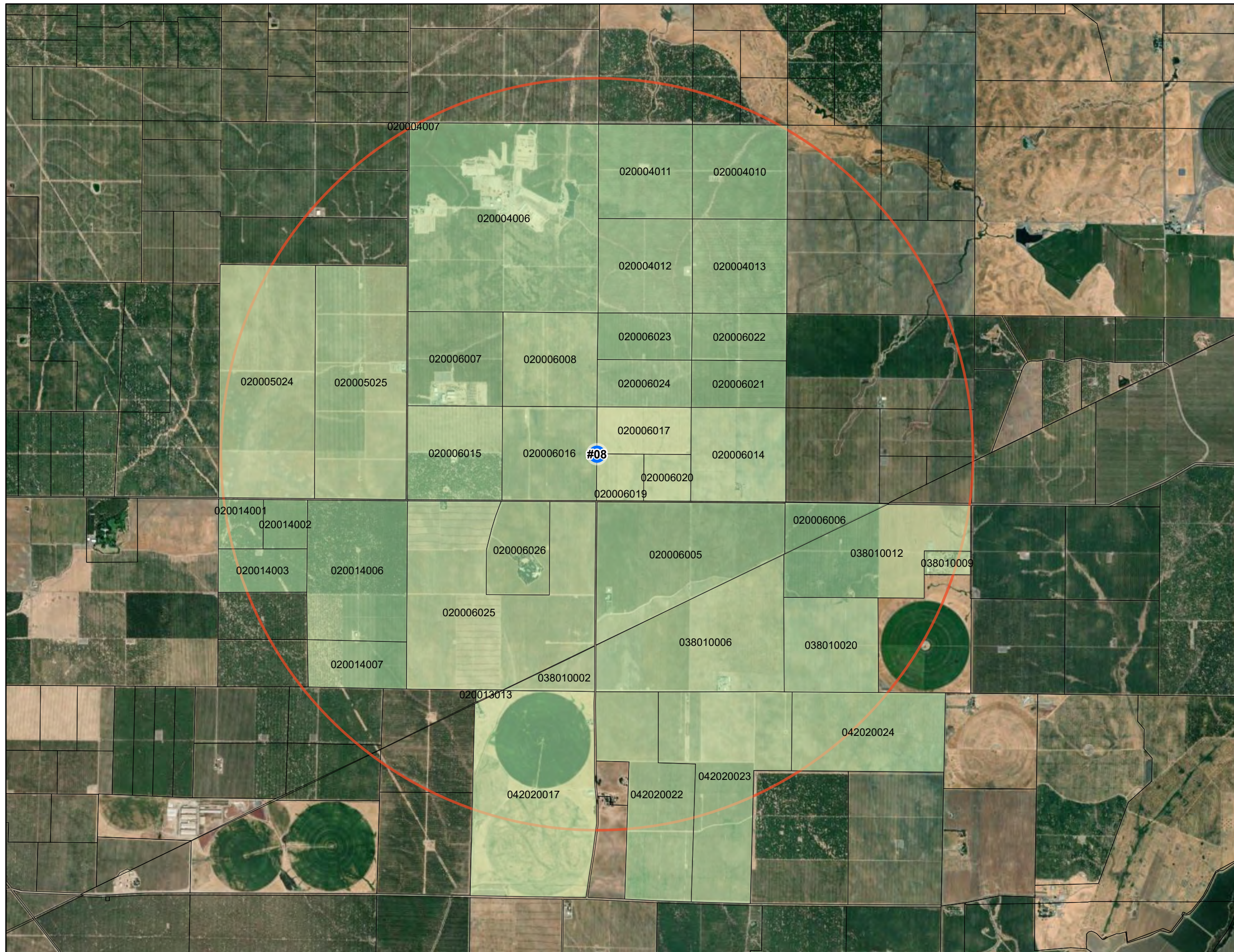
1. **Attach certified document of exemption finding.**
2. **Has a Notice of Exemption been filed by the public agency approving the project?** Yes No

Signature: *Karen L. Whitty* **Date:** 04/03/2025 **Title:** Board Clerk

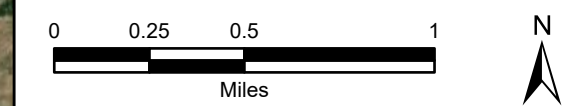
- Signed by Lead Agency**
- Signed by Applicant**

EXHIBIT “A”

Map of Priority Action Area for ETSGSA-08



- Wells
- Action Level 3 Priority Action Area (2-mile buffer)
- Priority Action Area Parcels
- Parcels



ETSGSA

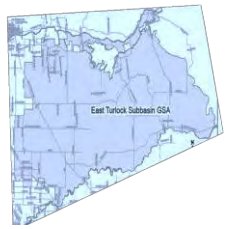
ETSGSA #08
Priority Action Area
Boundary and Parcels

DATE: FEB 06, 2025		FORMATION ENVIRONMENTAL
By: LEA	For: SAM	

EXHIBIT “B”

Priority Action Area Plan for ETSGSA-08

**EAST TURLOCK SUBBASIN GROUNDWATER SUSTAINABILITY AGENCY
JOINT POWERS AUTHORITY**



PRIORITY ACTION PLAN

Priority Action Area Name:	ETSGSA-08 Groundwater Level Priority Action Area
Designated Action Level:	<input type="checkbox"/> Level 1 <input type="checkbox"/> Level 2 <input checked="" type="checkbox"/> Level 3
Date Prepared/Modified:	March 19, 2025
Plan Status:	<input checked="" type="checkbox"/> Initial establishment <input type="checkbox"/> Escalation <input type="checkbox"/> De-Escalation
Plan Prepared By:	M. Ausburn
Plan Reviewed By:	M. Tietze
Date Adopted:	March 27, 2025

1. TRIGGER EVALUATION AND ACTION TIER DETERMINATION
<p>A. Threshold Exceedances <i>Document Demand Reduction Plan threshold trigger exceedances, the date they were observed and any other supporting information.)</i></p>
<p>Groundwater Levels – Because groundwater level monitoring in ETSGSA-08 began in 2019, the Sustainable Management Criteria (SMC) for this well are based on extrapolation of measured groundwater levels from nearby SGMA well EWD-01 (also identified as EWD-13). The SMC were recalculated in January 2025 (Provost & Prichard memorandum dated February 24, 2025) based on revised reference point elevations (RPE) from a survey of ETSGSA-08 and EWD-01 conducted in April 2023. The Minimum Threshold (MT) of 15 feet above mean sea level (ft-msl) is based on the manually measured low groundwater level in EWD-01 on 8/14/2015, and the 2027 IM of 5 ft-msl is based on a downward trend projection of groundwater levels in EWD-01.</p> <p>As shown in the attached hydrograph, the first groundwater elevation measurement in ETSGSA-08 was 8.76 ft-msl on 10/25/2019, which was already below the MT. Groundwater elevations to date have consistently remained below the MT. Groundwater elevations first dropped below the 2027 IM on 10/15/2020. After adoption of the GSP in January 2022, groundwater levels were above the 2027 IM during the Spring 2022 and Spring 2023 monitoring events, and below the 2027 IM during the Fall 2022, Fall 2023, Spring 2024 and Fall 2024 monitoring events. The overall trend in groundwater elevations is decreasing. Repeated groundwater levels below the 2027 IM over a period of three years with decreasing groundwater levels support a Level 3 status. Examination of hydrographs for wells located to in the surrounding area show generally decreasing groundwater levels, especially to the south and east of ETSGSA-08; however, this is the only well in this area with groundwater levels that have fallen below the 2027 IM. Trends for the closest Representative Monitoring Wells (ETSGSA-07 and ETSGSA-09) are declining but are not projected to fall below their respective 2027 IMs. The well is located a short distance east of the base of the cone of depression underlying the central portion of the GSA. Declining groundwater levels indicate that under current conditions, the cone of depression is continuing to grow.</p>
<p>B. Management Tier Designation <i>Identify the applicable management tier and any changes (escalations or de-escalations) and the supporting rationale)</i></p>
<p>Based on the data above, the ETSGSA-08 Groundwater Level PAA is designated Level 3.</p>

<p>C. Action Area Designation <i>Describe location and attach map)</i></p>
<p>The boundaries of the ETSGSA-08 Groundwater Level PAA are shown on Figures 1 and 2, attached. These boundaries were developed by the following procedure:</p> <ol style="list-style-type: none"> 1. Designation of a 2-mile preliminary buffer around well ETSGSA-08 (Figure 1); and 2. Adjusting the boundary along the borders of parcels or contiguous groups of parcels under related ownership (Figure 2). (If more than 50% of the land area of a parcel or group of parcels was in the PAA, they were assumed to be managed as part of the PAA; otherwise, they were assumed to lie outside the PAA.
<p>2. IMPLEMENTATION PERFORMANCE TREND ANALYSIS</p>
<p>A. Program Implementation Performance <i>Discuss any relevant information regarding the status and trends of Demand Reduction Program implementation.</i></p>
<p>Implementation of the Demand Reduction Plan is beginning in this area along with the rest of ETSGSA. We note that the farm on which the well is located has not been irrigated in the last several years, but not as a demand management action under the GSP. Proposals for projects under the Demand Management Plan have been solicited and meetings have been undertaken with local land owners to identify potential project and land repurposing opportunities. In addition, a project is planned in collaboration with TID to bring surface water for in lieu recharge under the Replenishment Water Program into this area by constructing a pipeline into the cone of depression. It is envisioned this project will also be used to provide Tuolumne River flood water for direct recharge.</p>
<p>B. Sustainability Indicator Performance <i>Present information regarding trends in Sustainability Indicator trends and relevant background information</i></p>
<p>As discussed under 1.A., Groundwater levels are decreasing in ETSGSA-08 completed in the Eastern Principal Aquifer. The farm on which the well is located has not been irrigated for the last two or three years, and continuing groundwater level declines in this well and surrounding wells indicates that demand reduction and/or recharge actions in the surrounding area, especially to the east, will be necessary in order to achieve groundwater level stabilization and recovery. No projects or management actions have been implemented in this area, but several projects are planned. Aquifer responses to these P&MAs will need to be assessed to evaluate the extent of actions needed.</p>

<p>3. RESPONSE ACTIONS</p>
<p>A. Objectives <i>Describe the objectives of the planned response actions</i></p>
<p>Specific objectives of this Priority Action Plan include the following:</p> <ul style="list-style-type: none"> • Arrest chronic groundwater level decline and achieve MTs by 2032; • Prevent the spread of drawdown exceeding the 2027 IM to surrounding wells; and • Minimize reduction of groundwater in storage.
<p>B. Investigations <i>Describe any planned investigations</i></p>
<p>The following investigation activities are proposed:</p> <ul style="list-style-type: none"> • Evaluate hydrographs in the surrounding areas and the future aquifer response to planned demand reduction projects to refine the local hydrogeologic understanding, better guide

ongoing actions, and assess whether expansion of the PAA will be needed in order to meet the above objectives;

- Identify and, if appropriate, investigate potentially suitable locations for recharge projects to be implemented using local runoff or imported surface water once the planned pipeline to deliver irrigation water and recharge water into the cone of depression is constructed; and
- If a recharge projects are implemented, collect monitoring data to assess long-term effectiveness and to inform further actions.

C. Groundwater Use Management Program Adjustments

Describe any planned changes in the Groundwater Management Framework, Groundwater Accounting Platform, or Groundwater Use Fees

The following changes are proposed to the Groundwater Use Management Program:

- Prohibit pooling of parcels inside the PAA with parcels outside the PAA in the same water account;
- Consider restricting Carryover Credits (when rules and regulations are adopted) to Category 0 and Category 1 water within the PAA;
- Restrict transfers across PAA boundaries (pending development of rules and regulations in 2025 or 2026); and
- Consider expansion of the PAA into the surrounding area and/or imposition of additional demand reduction measures if necessary based on the evaluation recommended above.

D. Project Implementation

Describe any planned projects or project implementation actions

The following project implementation activities are proposed:

- Give a higher priority score to and accelerate implementation of MLRP projects, Incentivized Rotational Fallowing and Surface Water delivery projects within the PAA;
- Utilize the planned pipeline project under GSP Project No. 9 to deliver Replenishment Water and recharge water to the PAA and the surrounding area; and
- Prioritize in lieu recharge and demand reduction projects over direct recharge projects.

E. Outreach and Coordination

Describe planned outreach, engagement and coordination efforts

The following outreach, engagement and coordination efforts will be undertaken:

- ETSGSA will conduct outreach to growers in the PAA to make them aware of the contents of this Priority Action Plan and engage them to provide assistance in the implementation of Projects and Management Actions.
- ETSGSA will coordinate implementation of this Priority Action Plan with any Projects and Management Actions implemented by the Eastside Water District (EWD) in the portion of the cone of depression that lies within their jurisdiction. ETSGSA and EWD will exchange information at the staff level, and discuss activities and findings during regular meetings of the ETSGSA Technical Advisory Committees.

4. MONITORING

A. Data

Describe the types of monitoring data that will be collected to evaluate the response action effectiveness.

The following types of monitoring data will be collected to help guide priority actions:

- Groundwater level data, including both hand tagged and continuous transducer data;
- Surface water delivery volumes; and
- ET measurement of consumptive groundwater use.

B. Monitoring Networks

Describe the monitoring networks that will be used to assess response action effectiveness, including any modifications.

The following types of monitoring networks and programs will be used to collect data to help guide priority actions:

- **Groundwater Levels:** Existing RMS and SGMA Wells in the PAA. Evaluate the need to add additional wells to better assess aquifer responses.
- **Consumptive Groundwater Use** – Continue collection and evaluation of ET data for all parcels and fields in the Priority Action Area using Land IQ.

5. THRESHOLDS AND FURTHER ACTIONS

A. Escalation

Describe the thresholds for further program escalation, including Sustainable Management Criteria compliance, trends and performance requirements.

Monitoring data shall be reviewed annually and assessed to determine if additional actions should be required or accelerated, or if the PAA should be expanded to meet the objectives of this Plan. If the following are observed, an immediate review shall be conducted to assess implementation of additional actions such as extraction prohibition and implementation of a land buyout program.

- If evaluation of hydrographs for surrounding wells suggests that escalated action is needed in the surrounding area achieve stabilization and recovery of groundwater levels; and/or
- Continued falling groundwater levels after 2027.

B. De-Escalation

Describe the thresholds for program de-escalation, including Sustainable Management Criteria compliance, trends and performance requirements.

Monitoring data shall be reviewed annually and assessed to determine if actions can be de-escalated based on the following criteria:

- Stabilization and recovery of groundwater levels over a three-year period.

6. SCHEDULE

A. Implementation Schedule

Outline the overall implementation schedule for response actions, monitoring and reporting.

The tentative implementation schedule includes the following:

- Planning activities with input from the TAC and local growers commenced in July 2024 and are ongoing.

<ul style="list-style-type: none"> • MLRP Pilot Projects will be selected for early implementation by April 2025 with implementation targeted to start June 2025. • Adjustments to the Groundwater Demand Management Program will be implemented with the reporting period starting November 2024. • Annual status reporting shall commence beginning with a report for activities in 2025.
<p>B. Milestones <i>Identify any specific performance, evaluation and other milestones to be met.</i></p>
<p>See above</p>

<p>7. REPORTING</p>
<p>A. Reporting Requirements <i>Describe the reporting requirements and frequency.</i></p>
<p>Evaluate monitoring and implementation annually by end of February each year for inclusion in a Priority Action Area Status Report to be included as an attachment to the previous year’s Annual Report, starting with the 2025 Annual Report submitted in early 2026.</p>
<p>B. Review and Approvals <i>Describe any requirements for periodic review and approvals.</i></p>
<p>The Priority Action Area Status Report shall be approved by the TAC and Board prior to submittal in annual reports to DWR.</p>

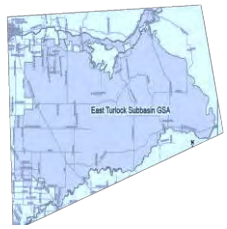
REFERENCES

Formation Environmental, 2024. Technical Memorandum: East Turlock Subbasin GSA Groundwater Demand Reduction Plan. Dated July 11, 2024.

Provost & Pritchard, 2025. Memorandum: Update SMC for East Turlock Subbasin GSA Monitoring Network. Dated January 31, 2025.

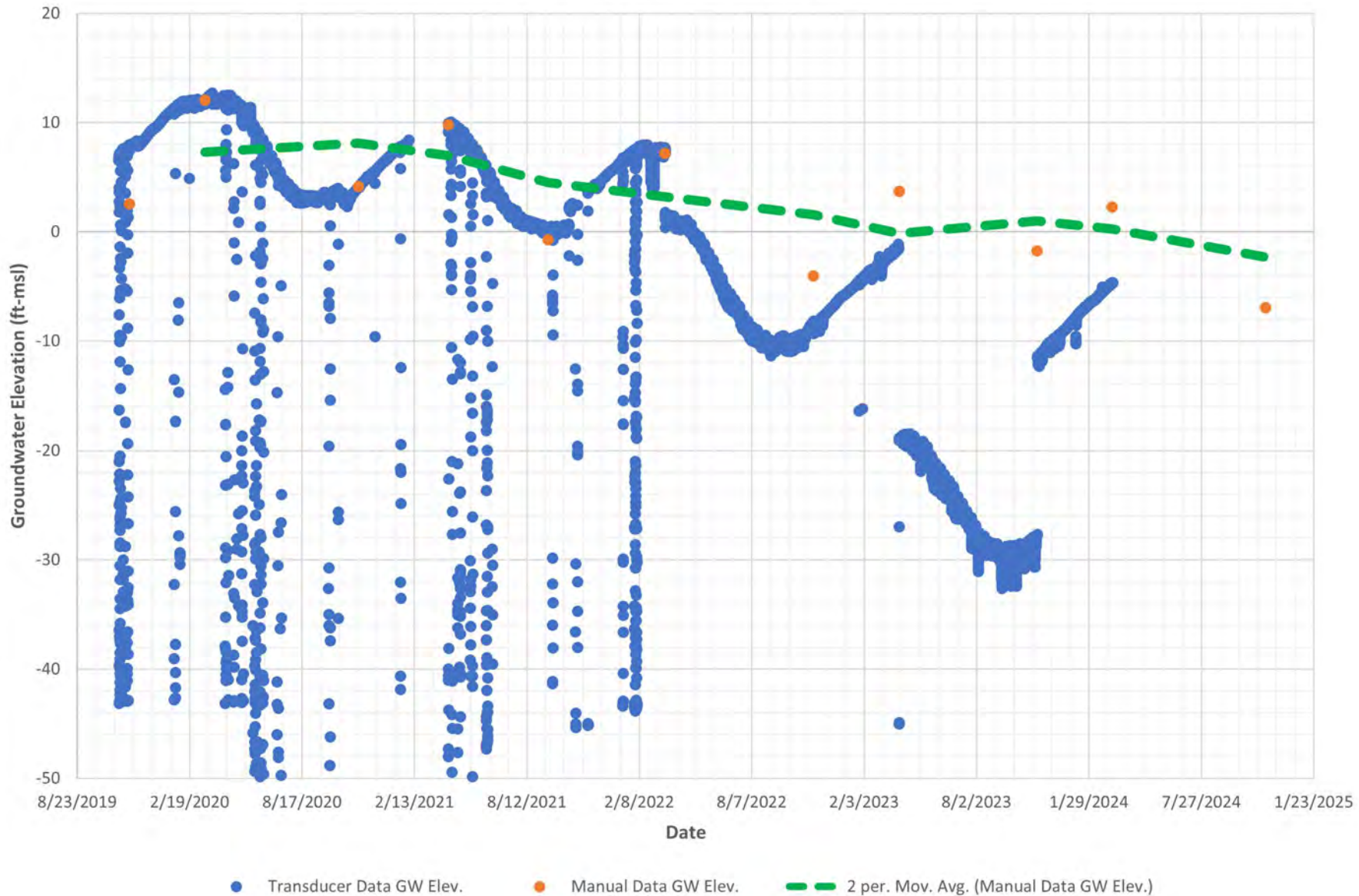
Todd Groundwater, 2024. Turlock Subbasin Groundwater Sustainability Plan (GSP): West Turlock Subbasin Groundwater Sustainability Agency and East Turlock Subbasin Groundwater Sustainability Agency. Revised July 2024.

**EAST TURLOCK SUBBASIN GROUNDWATER SUSTAINABILITY AGENCY
JOINT POWERS AUTHORITY**



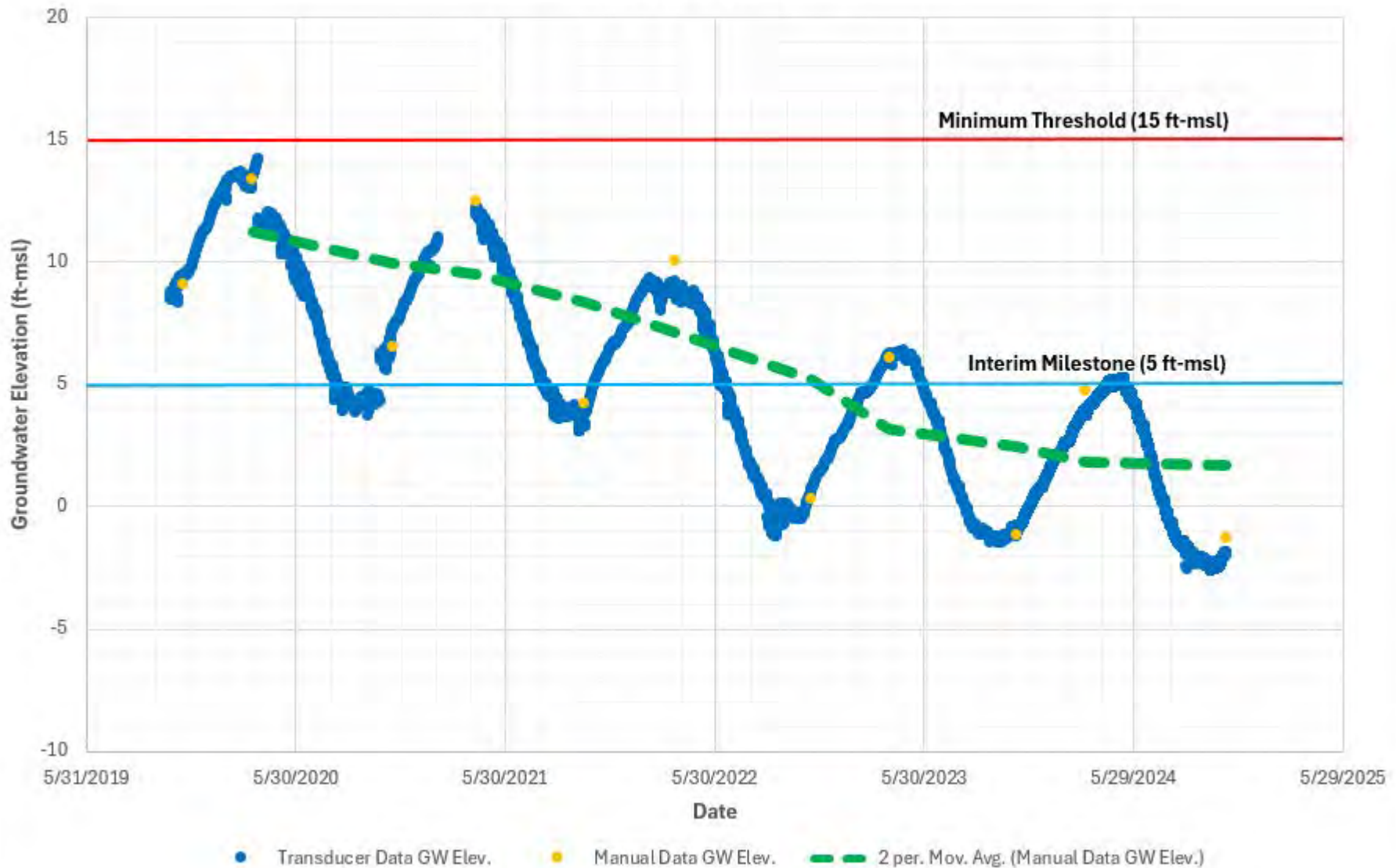
HYDROGRAPHS

ETSGSA-7 Hydrograph - Manual & Transducer Groundwater Elevation Data 10/28/2019 to 11/7/2024

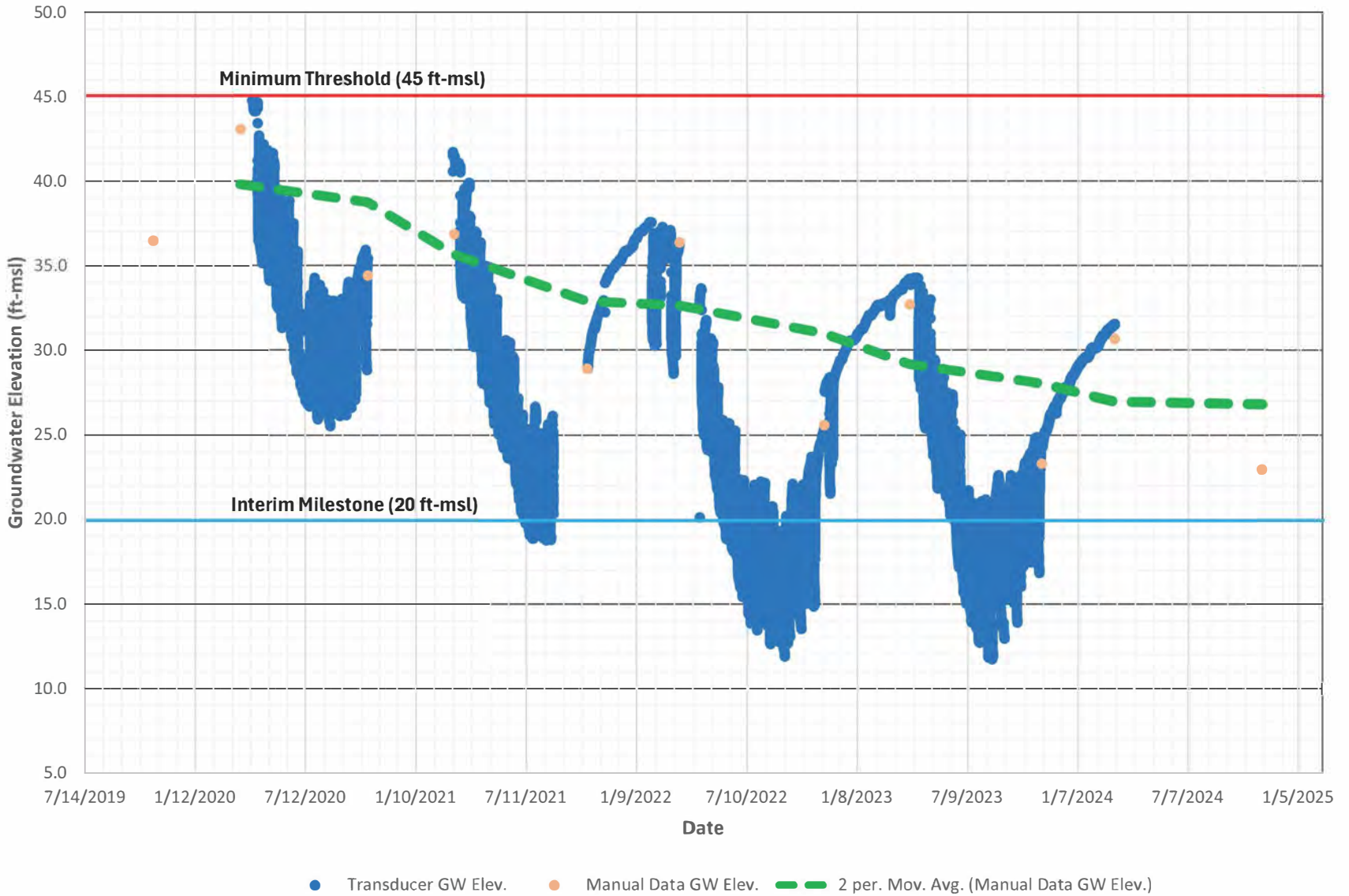


● Transducer Data GW Elev. ● Manual Data GW Elev. - - - 2 per. Mov. Avg. (Manual Data GW Elev.)

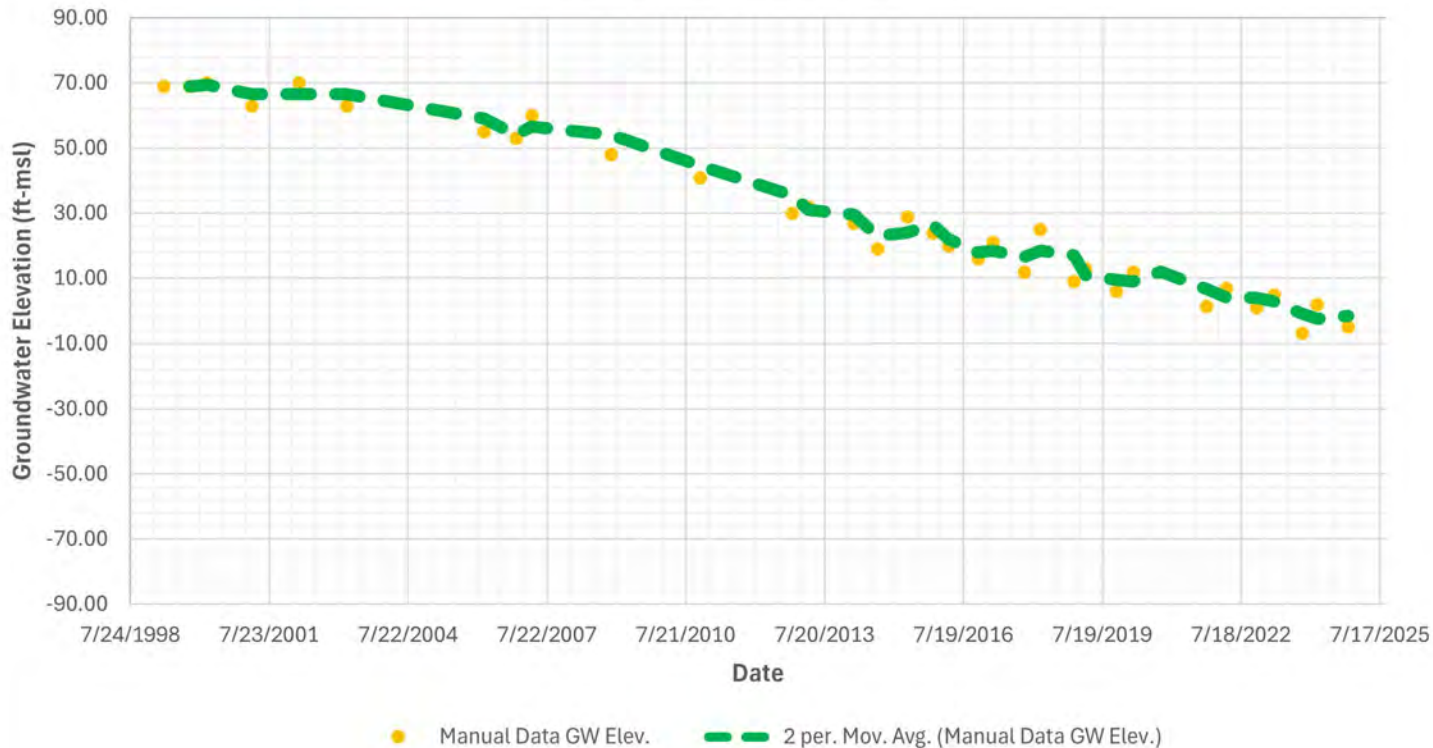
ETSGSA-8 Hydrograph - Manual & Transducer Groundwater Elevation Data (10/25/2019 to 11/6/2024)



ETSGSA-09 Hydrograph - Manual & Transducer Groundwater Elevation Data (11/4/2019 to 11/6/2024)



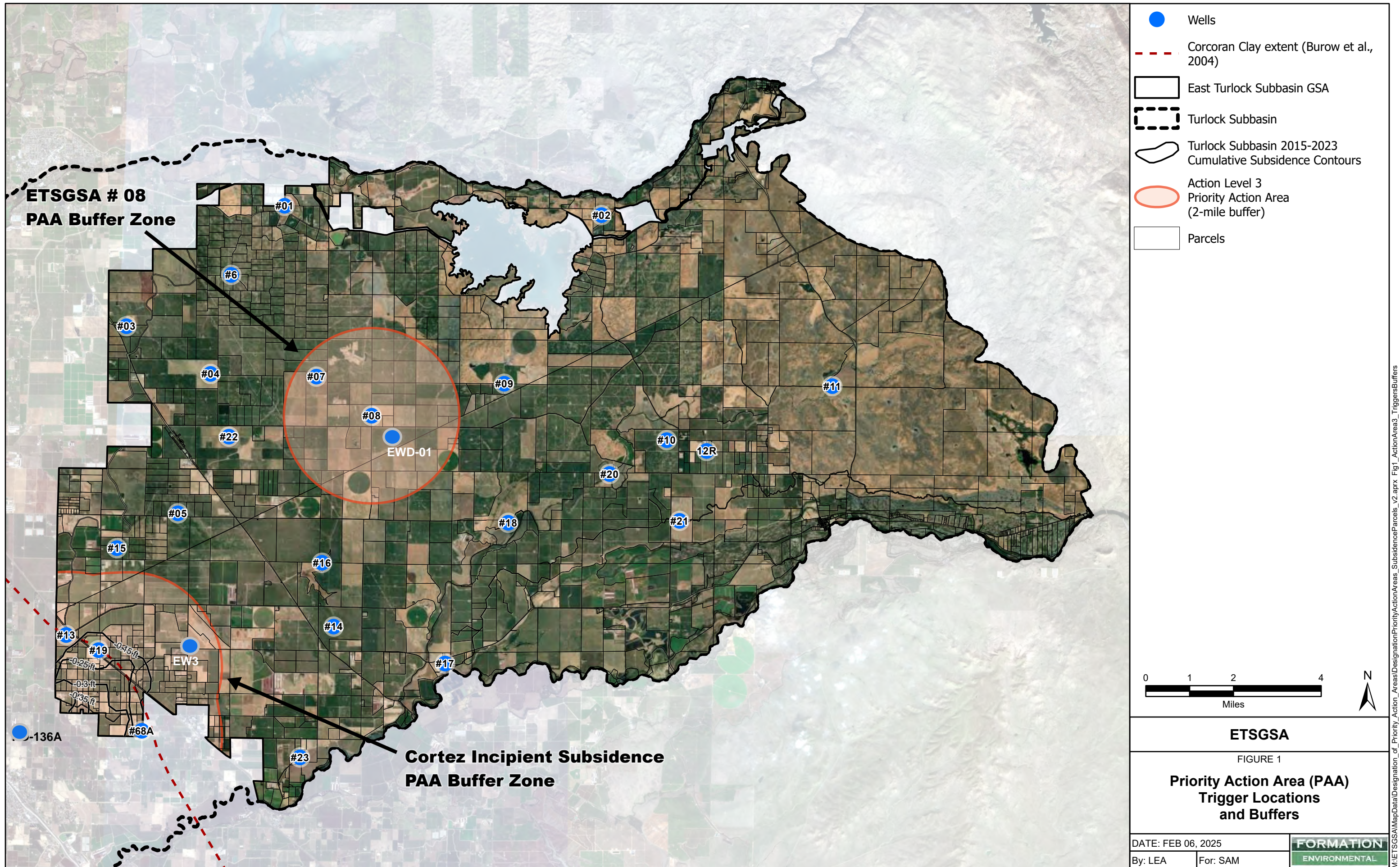
EWD-1 (EWD-13) Hydrograph - Manual Groundwater Elevation Data 4/14/1999 to 11/7/2024



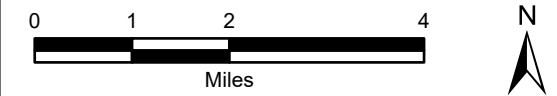
**EAST TURLOCK SUBBASIN GROUNDWATER SUSTAINABILITY AGENCY
JOINT POWERS AUTHORITY**



FIGURES



- Wells
- Corcoran Clay extent (Burow et al., 2004)
- East Turlock Subbasin GSA
- Turlock Subbasin
- Turlock Subbasin 2015-2023 Cumulative Subsidence Contours
- Action Level 3 Priority Action Area (2-mile buffer)
- Parcels



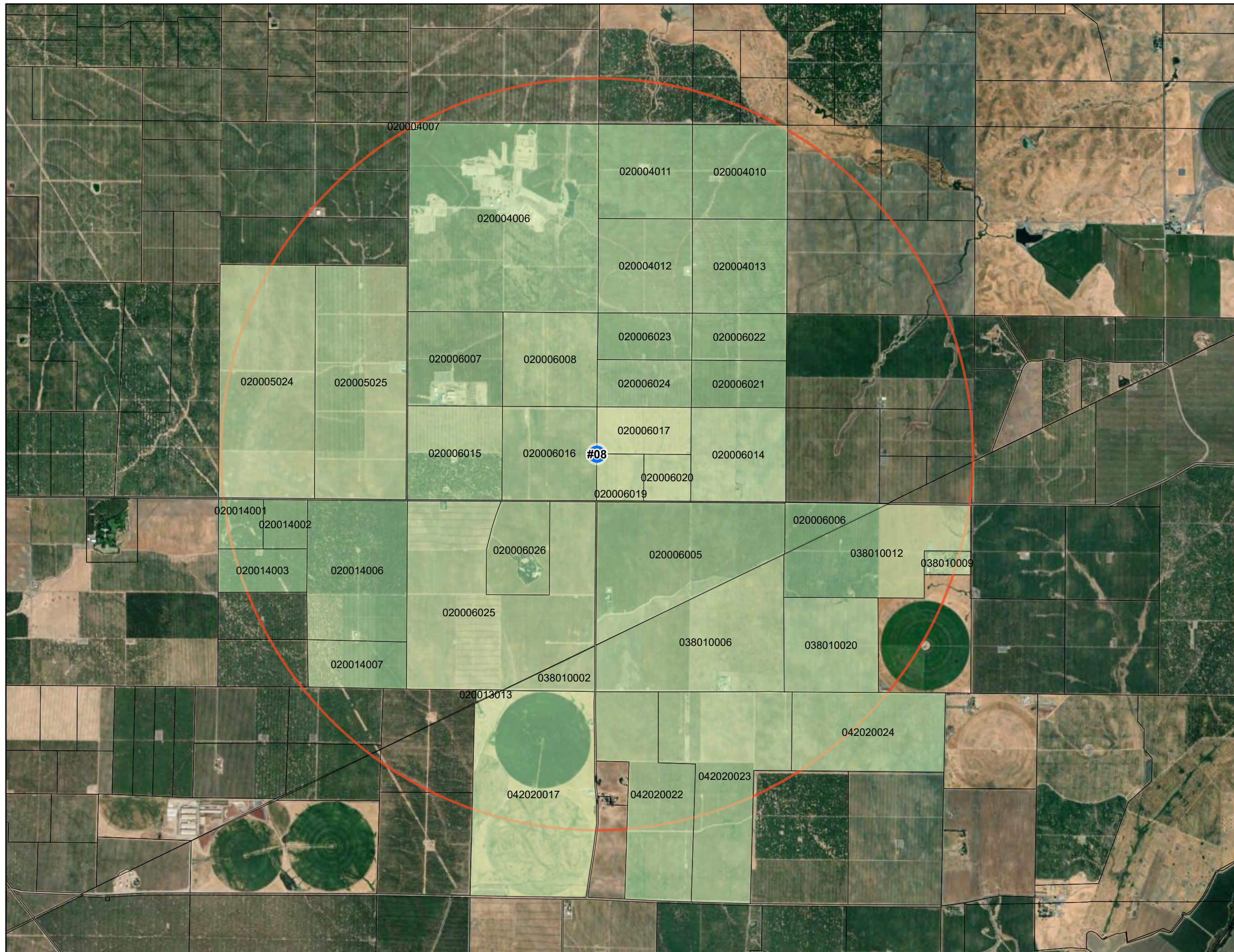
ETSGSA

FIGURE 1

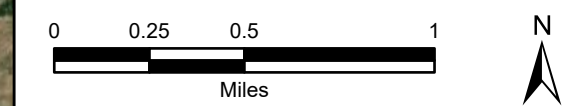
**Priority Action Area (PAA)
Trigger Locations
and Buffers**

DATE: FEB 06, 2025		FORMATION ENVIRONMENTAL
By: LEA	For: SAM	

M:\ETSGSA\MapData\Designation_of_Priority_Action_Areas\DesignationPriorityActionAreas_SubstanceParcels_v2.aprx Fig1_ActionArea3_TriggerBuffers



- Wells
- Action Level 3 Priority Action Area (2-mile buffer)
- Priority Action Area Parcels
- Parcels



ETSGSA
 FIGURE 2
ETSGSA #08
Priority Action Area
Boundary and Parcels

DATE: FEB 06, 2025		FORMATION ENVIRONMENTAL
By: LEA	For: SAM	

M:\ETSGSAMapData\Designation_of_Priority_Action_Areas\DesignationPriorityActionAreas_SubsideanceParcels_v2.aprx Fig2_ActionArea3_ParcelBoundary