

**Note:** Further refinements to this section are also anticipated during the Public DRAFT GSP review process.

# SIERRA VALLEY GSP CHAPTER 1 INTRODUCTION

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## 1.0 Introduction

The Sierra Valley Groundwater Management District (SVGMD) and Plumas County, the Groundwater Sustainability Agencies (GSAs) for the Sierra Valley Groundwater Subbasin (SV Subbasin), developed this Groundwater Sustainability Plan (GSP or Plan) in accordance with the California Department of Water Resources (DWR) Sustainable Groundwater Management Act (SGMA) of 2014. The purpose of the Plan is to roadmap the process to achieving sustainable groundwater management, as defined by SGMA, in the SV Subbasin (DWR Subbasin No. 5-012.01).

SGMA is a three-bill legislative package comprised of Assembly Bill (AB) 1739 (Dickinson), Senate Bill (SB) 1168 (Pavley), and SB 1319 (Pavley) signed into law in 2014 and codified in Section 10720 of the California Water Code. SGMA expands the role of DWR to support local implementation of GSPs and allows for intervention by the State Water Resources Control Board (SWRCB) at discrete points throughout the process if local agencies are not willing or able to manage groundwater sustainably. In addition to the one Assembly Bill and two Senate Bills, SGMA is partially defined by the “emergency regulations” (adopted by the DWR and incorporated into the California Code of Regulations, Sections 350 – 354.4) and a number of other documents<sup>1</sup>.

SGMA required critically-overdrafted, high- and medium-priority basins to be managed under a GSP by January 31, 2020, and all other groundwater basins designated as high- or medium-priority basins to be managed under a GSP by January 31, 2022. Additionally, SMGA requires demonstrated sustainability within 20 years of GSP implementation, and continued sustainability through the 50-year planning and implementation horizon.

SV Subbasin boundary modifications were completed in early 2019 and basin prioritization for the modified basins were revised by DWR in spring 2019. The SV Subbasin was characterized as a medium-priority basin that is not critically overdrafted per DWR Bulletin 118 (2019). An eligible local agency was therefore required to develop and implement a GSP by January 31, 2022 and achieve demonstrated sustainability by January 31, 2042. SVGMD and Plumas County chose to pursue sustainability and compliance with the requirements of SGMA via a multi-GSA, single GSP approach, led by SVGMD with the support of Plumas County, in hopes that SVGMD can retain their authority to manage groundwater in the SV Subbasin into the indefinite future. It is the belief of SVGMD and Plumas County that groundwater management by a local entity will best ensure the local communities’ needs are met and voices are heard while striving toward optimized groundwater management, consistent with the belief of former California Governor Jerry Brown who emphasized in his signing statement that “groundwater management in California is best accomplished locally”.

To facilitate such sustainable groundwater management, this Plan provides:

- Agency information and management structure (Chapter 1);
- All pertinent background information (Chapter 2) including description of the Plan Area and SV Subbasin setting, historical conditions, and current conditions;
- Modeled water budget information (Section 2.2.3.) including the estimated sustainable yield and discussion on how the value may change over time as a result of changes in climate;

<sup>1</sup> <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>

- 43 • Sustainable management criteria (Chapter 3) that will serve as the basis for evaluation  
44 of the sustainability of groundwater management in the SV Subbasin and the efficacy of  
45 this Plan;
- 46 • Assessment of the sustainability of the existing condition (Section 3.3) based on the  
47 sustainable indicators defined in SGMA and analysis of data collected over the past  
48 several decades, building upon the historic and existing conditions information provided  
49 in Section 2.2.2;
- 50 • Description of the existing monitoring network and protocol (Section 3.4), assessment of  
51 the existing network and protocol with respect to its ability to generate the data  
52 necessary to sufficiently evaluate the sustainability of groundwater management in the  
53 SV Subbasin, and planned improvements;
- 54 • Existing and potential projects and management actions that the GSAs are considering  
55 to achieve sustainability, i.e., meet the sustainable management criteria (Chapter 4); and
- 56 • GSP implementation information (Chapter 5) including estimated cost, implementation  
57 schedule, annual reporting protocol, and periodic evaluation protocol for evaluating the  
58 Plan's efficacy and amending the Plan as needed to achieve sustainability.

## 59 **1.1 Purpose of the Groundwater Sustainability Plan (GSP or Plan)**

60 The purpose of this Plan is to ensure that “sustainable groundwater management” in the SV  
61 Subbasin is achieved by the SVGMD by 2042 and maintained at least until 2072. Sustainable  
62 groundwater management is the management and use of groundwater in a manner that can be  
63 maintained during the planning and implementation horizon without causing “undesirable  
64 results.” Undesirable results are defined by SGMA as one or more of the following effects  
65 caused by groundwater conditions occurring throughout a groundwater basin:

- 66 (a) Chronic lowering of groundwater levels indicating a significant and unreasonable  
67 depletion of supply if continued over the planning and implementation horizon. Overdraft  
68 during a period of drought is not sufficient to establish a chronic lowering of groundwater  
69 levels if extractions and groundwater recharge are managed as necessary to ensure that  
70 reductions in groundwater levels or storage during a period of drought are offset by  
71 increases in groundwater levels or storage during other periods.
- 72 (b) Significant and unreasonable reduction of groundwater storage.
- 73 (c) Significant and unreasonable seawater intrusion (*not applicable to Sierra Valley*).
- 74 (d) Significant and unreasonable degraded water quality, including the migration of  
75 contaminant plumes that impair water supplies.
- 76 (e) Significant and unreasonable land subsidence that substantially interferes with surface  
77 land uses.
- 78 (f) Depletions of interconnected surface water that have significant and unreasonable  
79 adverse impacts on beneficial uses of the surface water.

80 To complete a specific local definition of undesirable results for each of the sustainability  
81 indicators, the SV Subbasin GSAs engaged stakeholders to develop a description of what would  
82 be considered “significant and unreasonable” impacts associated with each of the five pertinent  
83 undesirable results categories in the SV Subbasin. This requirement of the Plan is set forth in  
84 SGMA.

85 The purpose of this Plan, as implemented by the GSAs, is as follows:

- 86
- 87 • to facilitate groundwater management in the SV Subbasin with the objective of reducing  
88 and/or eliminating impacts associated with groundwater level declines, groundwater  
89 storage reductions, water quality degradation, land subsidence, and surface water  
90 depletions that result from groundwater extraction and are locally considered to be  
91 significant and unreasonable, and
  - 92 • to prevent to the extent practicable any such impacts from occurring by 2042 and  
thereafter until at least 2072.

93 This purpose serves as the basis of the intention of the sustainability goal described in the  
94 following section.

## 95 **1.2 Sustainability Goal**

96 As required by SGMA, the sustainability goal for the Basin was created through input from all  
97 the stakeholders who participated in the GSP planning effort. The goal fulfills the regulations put  
98 forward by the DWR to develop a sustainability goal that "...culminates in the absence of  
99 undesirable results within 20 years...." (23 CCR § 354.24).

100 The GSAs strive for equal access to groundwater for all current and future members of the  
101 Basin and that the water will be put to beneficial uses while being able to sustainably meet  
102 demand and avoid any undesirable results.

103 The overarching sustainability goal for groundwater management in the Sierra Valley Subbasin  
104 is:

105 **To manage groundwater resources in a manner that best supports the long-term health**  
106 **of the people, the environment, and the economy of Sierra Valley into the future by**  
107 **avoiding significant and unreasonable impacts to environmental, domestic, agricultural,**  
108 **and industrial beneficial uses and users of groundwater.**

109 The purpose of this goal is to avoid significant and unreasonable impacts to the environmental,  
110 agricultural, domestic, industrial, and community beneficial uses and users of groundwater in  
111 Sierra Valley. Progress toward the goal will be cumulatively quantified by the Sustainable  
112 Management Criteria discussed in Chapter 3.

113 Community input from the Technical Advisory Committee (TAC) indicated that priorities for  
114 Sierra Valley include:

- 115
- 116 • Maintaining viable agriculture and the quiet, rural nature of the valley;
  - 117 • Maintaining and enhancing the habitat for wildlife, including migratory and local bird  
118 populations;
  - 119 • Preventing drying out of wetlands, streams, and braided channels
  - 120 • Preventing water quality degradation;
  - 121 • Preventing impacts to domestic well users that would require drilling deeper wells;
  - 122 • Reducing or preventing new development, including industrial farming, airport expansion  
and housing developments;
  - 123 • Preventing subsidence; and
  - 124 • Managing the Subbasin to mitigate impacts of drought and to differentiate between  
125 drought conditions and other actions that cause undesirable results.

126 To address these priorities, the sustainability goal incorporates managing groundwater  
127 conditions for each of the applicable sustainability indicators in the Subbasin so that:

- 128 • Groundwater elevations and groundwater storage do not significantly decline below their  
129 historically measured range (i.e., January 2015 levels), thereby protecting the existing  
130 well infrastructure from impacts, protecting groundwater-dependent ecosystems, and  
131 avoiding significant streamflow depletion due to groundwater pumping.
- 132 • Groundwater quality is suitable for the beneficial uses in the SV Subbasin and is not  
133 significantly or unreasonably degraded.
- 134 • Significant and unreasonable land subsidence is prevented in the SV Subbasin.  
135 Infrastructure (e.g., roads, foundations, water conveyances, and well casings) and  
136 agriculture production in the SV Subbasin remain safe from land subsidence.
- 137 • Significant and undesirable depletions of interconnected surface water (ISW) due to  
138 groundwater pumping are avoided by arresting hydraulic gradients near ISW and  
139 through projects and management actions that bolster groundwater levels.
- 140 • The GSA groundwater management is effectively integrated with other watershed and  
141 land use planning activities through collaborations and partnerships with local, state, and  
142 federal agencies, private landowners, and other organizations, to achieve the broader  
143 “watershed goal” of adequate groundwater recharge and sufficient surface water flows to  
144 sustain healthy ecosystem functions.

145 The Sustainability Goal will be achieved by quantifying and minimizing potential impacts to  
146 domestic, residential, agricultural, industrial, and environmental beneficial users. Scientifically  
147 informed Sustainable Management Criteria will continue to be developed around these  
148 assessments that avoid significant and unreasonable impacts to beneficial uses and users of  
149 groundwater. Finally, the GSAs will implement projects and management actions, monitor  
150 Sustainable Management Criteria, and iteratively refine the GSP so that the Sustainability Goal  
151 is achieved during Plan implementation and is maintained afterward.

### 152 **1.3 Agency Information (Reg. § 354.6)**

153 Per Reg. § 354.6 of the California Code of Regulations, the GSP must include a copy of the  
154 information provided pursuant to Water Code Section 10723.8, with any updates, if necessary,  
155 along with the following information:

- 156 (a) The name and mailing address of the Agency.
- 157 (b) The organization and management structure of the Agency, identifying persons with  
158 management authority for implementation of the Plan.
- 159 (c) The name and contact information, including the phone number, mailing address and  
160 electronic mail address, of the plan manager.
- 161 (d) The legal authority of the Agency, with specific reference to citations setting forth the  
162 duties, powers, and responsibilities of the Agency, demonstrating that the Agency has  
163 the legal authority to implement the Plan.
- 164 (e) An estimate of the cost of implementing the Plan and a general description of how the  
165 Agency plans to meet those costs.

166 The information provided pursuant to Water Code Section 10723.8 is included as Appendix 1-1.  
167 The name and mailing address of the lead Agency (SVGMD) is provided on the title page of this  
168 Plan and is provided below.

169  
170 Sierra Valley Groundwater Management District  
171 PO Box 88  
172 Chilcoot, CA 96105

173 The name and mailing address of Plumas County (the GSA for the small area of the  
174 SV Subbasin which is outside of the SVGMD boundary) is provided below. The other  
175 information (items b, c, d, and e) is provided subsequently in this Chapter.

176 Plumas County Board of Supervisors  
177 520 Main St., Room 309  
178 Quincy, CA 95971

179 The Plan Manager is the individual point of contact for this Plan. The Plan Manager is  
180 responsible for submitting required documentation to DWR and reporting any comments,  
181 inquiries, and other Plan-related correspondences to the SVGMD Board of Directors. If the Plan  
182 Manager is to change, the Plan Manager information below will be updated.

183 Jenny Gant  
184 Clerk of the Board  
185 Sierra Valley Groundwater Management District  
186 PO Box 88  
187 Chilcoot, CA 96105  
188 (530) 414-6831  
189 [sierravalleygmd@sbcglobal.net](mailto:sierravalleygmd@sbcglobal.net)

### 190 **1.3.1 Organization and Management Structure of the Groundwater Sustainability** 191 **Agency (GSA or Agency)**

192 SVGMD was authorized under SB 1391 in 1980 to protect and oversee the management of the  
193 groundwater within the SV Subbasin. SVGMD submitted notification to DWR in 2017 to become  
194 the exclusive GSA for the portion of the SV Subbasin that lies within their groundwater  
195 management district statutory boundary and thereby became the lead Agency for the majority of  
196 the SV Subbasin. A relatively small area of the northwest corner of the SV Subbasin  
197 (approximately 115 acres or <0.1% of total SV Subbasin area) falls outside of SVGMD  
198 boundary and therefore excludes SVGMD from eligibility to be the GSA for that area.

199 Accordingly, Plumas County submitted notification and became the exclusive GSA for that area,  
200 and in accordance with Water Code Section 10723.6, SVGMD and Plumas County established  
201 a memorandum of understanding (MOU) to establish their respective roles in GSP development  
202 and implementation. The MOU, provided in Appendix 1-2, outlines that the two entities will work  
203 together to develop and adopt a single SGMA-compliant GSP for the SV Subbasin using sound  
204 groundwater science and local expertise.

205 The SV Subbasin area for which Plumas County is the GSA is located entirely on Plumas  
206 National Forest lands and is a hydrologically important area within Sierra Valley along the  
207 federally designated Wild and Scenic River corridor of the Middle Fork of the Feather River. This  
208 area stretches from near the east end of Rocky Point Road to the western edge of the Sierra  
209 Valley basin in the Middle Fork Feather corridor. For the local Maidu, Paiute, and Washoe  
210 tribes, this part of the Wild and Scenic corridor has deep and enduring cultural connections that



211 predate both establishment of the U.S. Forest Service and non-tribal settlement of the region.  
212 Present-day, this area includes a grazing allotment managed by Plumas National Forest (“the  
213 Ramelli Allotment”), which is the location of an irrigation water right from Big Grizzly Creek near  
214 its confluence with the Middle Fork of the Feather River.

215  
216 Because SVGMD is the GSA for the vast majority of the SV Subbasin, SVGMD is considered  
217 the lead GSA, and, as such:

- 218 • Monitors groundwater levels using monitoring wells located throughout the District  
219 boundary;
- 220 • Meters active large-capacity agricultural wells (those capable of pumping 100 gallons  
221 per minute or more);
- 222 • Prepares technical reports and evaluations on groundwater;
- 223 • Reviews development project proposals within the District boundary; and
- 224 • Executes all other powers invested in the District by SB 1391 and SGMA.

225 As the lead GSA for the SV Subbasin, and in coordination with the Plumas County GSA, the  
226 SVGMD will be responsible for overseeing implementation of this Plan, including monitoring and  
227 reporting. Furthermore, the SVGMD will coordinate with Sierra County, for the areas within the  
228 District’s southern boundary.

229 The SVGMD Board of Directors holds public Board meetings monthly and regularly publishes  
230 meeting minutes, ordinances, technical reports, and other information online<sup>2</sup>. Plumas County  
231 representatives, representatives of affected agencies, and engaged community members  
232 regularly attend SVGMD Board meetings and participate in discussions. The organization and  
233 management structure of SVGMD is as outlined in SVGMD’s enabling legislation<sup>3</sup>. SVGMD’s  
234 Policies and Procedures Manual and Purchasing Policy, which are included as Appendix 1-3  
235 and 1-4, provide additional information pertaining to SVGMD’s organization and management  
236 structure.

237 The Plumas County Board of Supervisors holds public meetings on the first three Tuesdays of  
238 every month, and publishes<sup>4</sup> meeting minutes, agendas, and other information. The Plumas  
239 County Board of Supervisors oversees the management of County government, in addition to  
240 governing a handful of County special districts including the Plumas County Flood Control &  
241 Water Conservation District. Five supervisors are elected by constituencies of each district, and  
242 serve all citizens of Plumas County during a four-year term. The Clerk of the Board of  
243 Supervisors<sup>5</sup> provides support to the Board of Supervisors and information to the public.

244 The Sierra County Board of Supervisors<sup>6</sup> is the governing body of the County and enacts  
245 ordinances and resolutions, adopts the annual budget, approves contracts, appropriates funds,  
246 determines land use zoning for the unincorporated area, and appoints certain County officers  
247 and members of various boards and commissions. The Board also sits as the Sierra County  
248 Flood Control and Water Conservation District and Sierra County Board of Equalization. The  
249 Board of Supervisors is composed of five members elected from the five separate districts of the  
250 County, on a non-partisan basis, to serve four-year staggered terms. The Board meets on the

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<sup>2</sup> <http://www.sierravalleygmd.org/>

<sup>3</sup> <https://svgmd.specialdistrict.org/enabling-act>

<sup>4</sup> <http://plumasoca.suiteonemedia.com/web/Home.aspx>

<sup>5</sup> <https://www.plumascounty.us/418/Clerk-of-the-Board-of-Supervisors>

<sup>6</sup> <http://www.sierracounty.ca.gov/182/Board-of-Supervisors>

251 second and third Tuesday of each month. Meeting agendas and background are available to the  
252 public prior to the meeting. The Clerk of the Board of Supervisors provides administrative  
253 support to the members of the Board of Supervisors in its response to the needs of the public.

### 254 **1.3.2 Legal Authority of the GSAs**

255 In 1980, SVGMD was authorized under SB 1391 to protect and oversee the management of the  
256 groundwater within the SV Subbasin. SB 1391 defined the legal boundaries and regulatory  
257 authority of the District and authorized its creation by a joint exercise of powers agreement  
258 between Plumas and Sierra counties.

259 In late 1980 SB 1401, referred to as the "SB 1391 Clean-Up Bill", amended and repealed  
260 selected sections of SB 1391 and deleted specified provisions requiring the District to limit or  
261 suspend groundwater extractions for export before limiting extractions by overlying users (DWR,  
262 1983). The bill also revised provisions of SB 1391 relating to the approval of proposed  
263 development projects within the District that propose to extract groundwater for water service  
264 (DWR, 1983).

265 In accordance with Water Code Section 10723(c)(1), SVGMD was deemed the exclusive GSA  
266 for the portion of the SV Subbasin that is within SVGMD's statutory boundary. In accordance  
267 with Water Code Section 10723.8, upon submitting notification to DWR to become the GSA for  
268 that portion of the SV Subbasin, SVGMD was authorized the legal powers of a GSA as  
269 described in Chapter 5 of SGMA (Water Code Sections 10725 - 10726.9).

270 In accordance with Water Code Section 10723(a), Plumas County was eligible to become the  
271 exclusive GSA for the portion of the SV Subbasin that is outside of the SVGMD's statutory  
272 boundary. In accordance with Water Code Section 10723.8, upon submitting notification to  
273 DWR to become the GSA for the small area of the SV Subbasin that is outside of the SVGMD  
274 boundary, Plumas County was authorized the legal powers of a GSA as described in Chapter 5  
275 of SGMA (Water Code Sections 10725 - 10726.9).

### 276 **1.3.3 Estimated Cost of Implementing the GSP and the GSA's Approach to Meet** 277 **Costs**

278 The funding for GSP implementation may come from a combination of local, state, and federal  
279 sources. SVGMD has been funded by contributions from Sierra and Plumas Counties,  
280 management charges on parcels and on active large-capacity wells, and grants. The general  
281 direction from the Board of Directors in regard to funding GSP implementation can be  
282 summarized as:

- 283 • District expenses should be well-controlled
- 284 • Funding strategy needs to be locally viable and right sized
- 285 • Funding Strategy needs to focus on fairness.

286 The SVGMD's Joint Powers Agreement states that the District can request funds from Plumas  
287 and Sierra Counties, as needed. In recent years, both Counties have contributed \$4,000  
288 annually towards District operating expenses. SVGMD's existing revenue sources also include  
289 two management charges: a "meter fee," associated with large-capacity wells metered by the  
290 District, and a "parcel fee," which is based on acreage. The authority to enact these charges  
291 derives from the District's enabling act, Water Code Appendix 119. The Board is responsible for  
292 enacting charges by ordinance.

293 For fiscal years 2018-19 and 2019-20, the District's parcel fee was fixed at a total of 30 cents  
294 per acre, per year, for parcels over 40 acres, and a total charge of \$10.00 per year on all



295 parcels of 40 acres or less. Beginning in fiscal year 2020-21, this fee was reduced to a rate of  
296 15 cents per acre per year, for parcels over 40 acres, and a total charge of \$6.00 per year on all  
297 parcels of 40 acres or less. The District has established the continuation of this lower rate going  
298 forward for fiscal year 2021-22. In 2020/21 the parcel fees totaled \$32,798 and the meter fees  
299 total \$12,200 for a total annual fee revenue of \$44,998.

300 On May 13, 2020, under the California Drought, Water, Parks, Climate, Coastal Protection, and  
301 Outdoor Access for All Act of 2018 (Proposition 68), SVGMD accepted \$2,000,000 from the  
302 California Department of Water Resources to assist in financing the Sierra Valley Subbasin  
303 Groundwater Sustainability Plan (GSP) Development Support to improve sustainable  
304 groundwater management, pursuant to Water Code Section 79700 et seq.

305 The cost breakdown for implementing and managing the GSP is presented and described in  
306 more detail in Chapter 5 and in Appendix 5-2 but also includes a fiscal reserve for unexpected  
307 and miscellaneous costs. The major cost categories are:

- 308 • Agency administration and operations
- 309 • GSP reporting (annual and 5-year reports)
- 310 • Monitoring, data collection, and technical support
- 311 • Technical work and model maintenance
- 312 • Outreach, coordination, and education
- 313 • Legal support
- 314 • Projects and management actions

315 The total estimated cost of GSP implementation over the next 20 years (2022 to 2042) is  
316 estimated to be in the range of \$68,500 - \$142,000 (present dollar value), annually, based on  
317 the best available information.

318 The GSAs will pursue various available funding opportunities to assist in covering the yearly  
319 costs as described further in Appendix 5-2. As part of the implementation, SVGMD will review  
320 its current fee structure and update as necessary. It is expected that SVGMD will manage the  
321 implementation and reporting of the GSP, with support from other entities as needed. This  
322 updated fee structure will be continually used to fund the GSAs and GSP implementation up to  
323 the end of the 20-year period.

## 324 **1.4 GSP Organization**

325 The Plan was developed using the DWR's Groundwater Sustainability Plan Annotated Outline  
326 (December 2016) and is therefore organized consistent with that Outline. Content requiring  
327 additional information was sourced from the Preparation Checklist for GSP Submittal (DWR  
328 2016).

329 DWR's Preparation Checklist for GSP Submittal was completed and added to this Plan as  
330 Appendix 1-5 to provide a quick reference guide for locating specific required information.

### 331 **1.4.1 Description of how the GSP is organized**

332 The GSP is organized as follows:



- 333
- 334
- 335
- **Executive Summary:** This section presents an overview of the GSP, a background of the groundwater conditions within the Basin, a timeline of the GSP Development process, and key information from each of the GSP sections.
  - **Chapter 1.0 Introduction:** This section states the purpose of the GSP, the Basin’s Sustainability Goal, information on the GSA and its member agencies and the organization of the GSP.
  - **Chapter 2.0 Plan Area and Basin Settings:** This section describes the Sierra Valley Subbasin Groundwater Plan, current conditions within the Subbasin, and a historical baseline and models for future scenarios. This historic and projected data provides context to be able to sustainably manage the basin into the future. This section also provides the Basin water budget as context for achieving long-term sustainability within the basin.
  - **Chapter 3.0 Sustainable Management Criteria:** This section discusses the Subbasin’s Sustainability Goal as well as the criteria for addressing the five pertinent SGMA Sustainability Indicators, including the associated Minimum Thresholds, Measurable Objectives, and proposed monitoring strategy created for the Sierra Valley Subbasin. These criteria provide the framework for when the sustainability of the Basin is at risk, and therefor when management actions need to be undertaken by the GSAs.
  - **Chapter 4.0 Projects and Management Actions:** This section provides a description of projects and management actions proposed to achieve Subbasin sustainability and provides a strategy for evaluating and prioritizing these actions.
  - **Chapter 5.0 Plan Implementation:** This section provides an estimate of GSP operating costs and the proposed implementation schedule for management actions. It also outlines the procedural requirements for the yearly and 5-year evaluations to the GSP and the associated steps necessary if any parts of the GSP need to be updated.

358 **1.4.2 Preparation Checklist for GSP Submittal**

359 This GSP was prepared to meet the regulatory requirements established by DWR, as shown in  
360 the completed GSP Elements Guide, provided in Appendix 1-5, which is organized according to  
361 the California Code of Regulation Sections of the GSP Emergency Regulations.