DRAFT
CHAPTER 5
PLAN IMPLEMENTATION

5.1 IMPLEMENTATION OF THE GSP

Implementation of the GSP involves implementing the Baseline Projects and Management Actions outlined in Chapter 4, as well as various management and administration activities including data collection and analysis, annual reporting to DWR, and the periodic review and evaluation of the GSP typically at five (5) year intervals. Because undesirable results are not known to be occurring at time of adoption of this GSP, the initial implementation of the GSP focuses primarily on projects and management actions designed to fill known data gaps in the MGB. In the event that undesirable results are projected to occur or are occurring, the appropriate projects and management actions will be developed and implemented to ensure basin sustainability, and the related scopes, schedules, and costs will be documented in future updates of this GSP.

5.1.1 Baseline Projects and Management Actions

The Baseline Projects and Management Actions include: (1) Expansion of Groundwater Level and Water Quality Monitoring, (2) Expansion of Seawater Intrusion Monitoring, (3) Evaluation of the Groundwater - Surface Water Interactions, (4) Development of Stakeholder Incentive Programs, (5) Updating the Basin Numerical Model, and (6) Enhancement of the Groundwater Well Database. Chapter 4 - Projects and Management Actions describes the Baseline Projects and Management Actions and their related scopes of work, benefits, schedules, and required coordination.

5.1.2 Data Collection, Analysis, and Reporting

Historical hydrogeologic and hydrologic data for the MGB has been collected by multiple entities including MWD, and the MBGSA. Historical data used for the preparation of the GSP includes groundwater elevation, groundwater quality, groundwater production, imported water, and surface water flow. Meteorological data used includes precipitation, temperature, and evapotranspiration. Several other agencies have contributed data as well including the NOAA, USGS, Santa Barbara County, and CIMIS. A description of data sources and programs is provided in Chapter 2, Section 2.1.2 - Existing Monitoring Programs.

The MBGSA received a DWR Sustainable Groundwater Management Grant in May of 2020 with which it implemented multiple projects involving data collection and analysis including sea water intrusion monitoring, private well metering, surface water flow monitoring, development of a Basin Numerical Model, and construction of several groundwater monitoring wells (Section 2.1.2.5 - Monitoring Network Grant Programs). These projects have begun to fill identified data gaps, and expansion of these projects is anticipated with GSP implementation as described in Chapter 4 Projects and Management Actions. The Baseline Projects and Management Actions described in Chapter 4 are anticipated to be implemented during the initial years of GSP implementation. The MBGSA anticipates funding these projects through State grants and may also use other sources of funding (Section 5.4 - Funding Sources). Among other benefits, these projects will fill data gaps associated with (a) groundwater levels and groundwater quality in SU 2 and the Toro Canyon SU, (b) seawater intrusion in SU 3 and the Toro Canyon SU, (c) interconnection of surface water and groundwater near MGB creeks, and (d) groundwater extractions from private wells throughout the MGB.

The representative monitoring network for the MGB is designed to provide adequate data to evaluate the Sustainability Criteria established in this GSP and support the Sustainability Goal. The representative monitoring network is described in detail in Section 3.5 - Monitoring Network. Monitoring of Sustainability Indicators will evolve with the implementation of the Projects and Management Actions described in Chapter 4 and the data acquired will be reported to DWR with the annual reports and 5-year GSP evaluation, and will also be submitted semi-annually to DWR's SGMA Monitoring Network Module data repository.

5.1.3 Annual Report Preparation

Details of the information that will be included in the annual reports are presented in Section 5.5 - Annual Reporting. Should annual reports be produced with the assistance of consultants, the associated costs will be incorporated in the MBGSA's operating budget.

5.1.4 Preparation of the 5-year Evaluation

At least every five years following adoption of the GSP, the MBGSA will prepare and submit to DWR an Agency Evaluation and Assessment Report along with the Annual Report (23 CCR §356.4). This report will include the status of the implementation of projects and management actions and a summary of the data and information acquired that fill identified data gaps. The report will also include an assessment of the groundwater extractions and conditions in the MGB.

As discussed in Chapter 3 – Sustainable Management Criteria and Chapter 4 – Projects and Management Actions, it is anticipated that the first 5-year evaluation prepared following GSP adoption will include the results of the Baseline Projects and Management Actions, the data acquired through implementation of the projects and management actions, and reevaluation of the assumptions and analyses included in the GSP. The sustainable management criteria will be reevaluated in the context of the newly acquired data and information, in particular for interconnected surface water and groundwater, the establishment of which has been postponed pending the filling of related data gaps (Section 3.2.6 - Depletions of Interconnected Surface and Groundwater – Undesirable Results). It is anticipated that the costs to prepare the 5-year evaluations will be incorporated into the GSAs annual operating budget. Details of the information to be provided in the 5-year reports are presented in Section 5.6.

5.2 GSP IMPLEMENTATION SCHEDULE

The MBGSA has developed an implementation schedule for Baseline Projects and Management Actions, MGB monitoring activities, and various GSP reporting components (Figure 5-1). MBGSA activities occurring beyond the five-year horizon have not been included in the schedule due to uncertainty in details and timing but will be included in future updates of the GSP.

5.3 ESTIMATED COSTS FOR GSP IMPLEMENTATION

The principal costs components associated with GSP implementation are as follows:

- Implementation of Baseline Projects and Management Actions
- Data collection, validation, and analysis
- Annual report preparation
- Management, administration, and other associated activities
- Preparation of the 5-year GSP evaluation

Estimated costs for GSP implementation through 2028 are presented in Tables 5-1 and 5-2. Cost estimates will be reviewed and updated periodically and with each future GSP update.

Table 5-1. GSP Implementation Planning-Level Cost Estimates (2023 - 2028)

Activity	Estimated Cost	Implementation or Frequency	Anticipated Cost: 2023-2028*
Implementation of Baseline Projects and Management Actions**			
Expand Groundwater Level and Quality Monitoring	$53,000	Prior to 2028	$53,000
Expand Seawater Intrusion Monitoring	$1,186,000	Prior to 2028	$1,186,000
Evaluate Groundwater-Surface Water Interactions	$685,000	Prior to 2028	$685,000
Develop Stakeholder Incentive Programs	$115,000	Prior to 2028	$115,000
Update MGB Numerical Model	$195,000	Prior to 2028	$195,000
Enhance Groundwater Well Database	$70,000	Prior to 2028	$70,000
		Subtotal	***$2,304,000***
Management and Administration*			
Staffing (Salary and Benefits)	$355,000	Annually	$1,902,000
Outreach	$15,000	Annually	$85,000
Administrative Expenses***	$90,000	Annually	$480,000
Legal	$30,000	Annually	$160,000
Other Expenses (Board Member Comp. / Travel)	$10,000	Annually	$54,000
		Subtotal	***$2,681,000***
Ongoing Groundwater Monitoring Program			
Groundwater Extraction Monitoring	$1,000	Quarterly	$20,000
Groundwater Quality Monitoring	$2,500	Quarterly	$50,000
Groundwater Level Monitoring	$5,100	Quarterly	$102,000
Surface Water Flow Monitoring	$29,000	Quarterly	$580,000
Seawater Intrusion Monitoring	$3,700	Quarterly	$74,000
		Subtotal	***$830,000***
GSP Annual Report	$50,000	Annually	$270,000
		Subtotal	***$270,000***
GSP 5-Year Periodic Evaluation			
Report Preparation	$250,000	Single	$250,000
Refine, update, and recalibrate groundwater model	$100,000	Single	$100,000
		Subtotal	***$350,000***
		Total	**$6,435,000**

Notes: Does not include Groundwater Augmentation Program costs; Assumes 3.5% inflation factor annually; Baseline Projects and Management Projects, GSP Annual Report, and Ongoing Monitoring Program in GSP Year 1, 2, and 3 are all eligible for Grant Funding through DWR.

* All estimates rounded to nearest thousand

** All Projects and Management Actions (PMAs) estimates are based on costs described in Chapter 4 for Baseline PMAs and run through 2026 to align with potential Grant funding, assumes no additional PMAs required, and no Undesirable Results in MGB. Update MGB Numerical Model includes $15,000/year for MGB Model Updates in GSP Year 4 and 5.

*** Administrative Expenses includes Office Space Rental, Utilities, Supplies, and Liability Insurance

Table 5-2 GSP Implementation Planning-Level Cost Estimates Detail (2023 - 2028)

GSP Year	Fiscal Year	Management Cost*	Administrative Expenses**	Legal	Outreach	Other Expenses	GSP Annual Reporting	GSP Periodic Evaluation (5 Year)	Ongoing Groundwater Monitoring Program	Projects and Management Actions***	Total
1	2024	$355,000	$90,000	$30,000	$15,000	$10,000	$50,000		$307,000	$448,800	$1,305,800
2	2025	$367,000	$93,000	$31,000	$16,000	$10,000	$52,000		$194,000	$1,099,500	$1,862,500
3	2026	$380,000	$96,000	$32,000	$17,000	$11,000	$54,000		$152,000	$725,700	$1,467,700
4	2027	$393,000	$99,000	$33,000	$18,000	$11,000	$56,000	$87,000	$87,000	$15,000	$799,000
5	2028	$407,000	$102,000	$34,000	$19,000	$12,000	$58,000	$263,000	$90,000	$15,000	$1,000,000
	Total	**$1,902,000**	**$480,000**	**$160,000**	**$85,000**	**$54,000**	**$270,000**	**$350,000**	**$830,000**	**$2,304,000**	**$6,435,000**

Notes: All estimates rounded to nearest thousand (excluding PMAs); does not include Groundwater Augmentation Program costs; Assumes 3.5% inflation factor annually; GSP Annual Reporting, Ongoing Groundwater Monitoring Program, and Projects and Management Actions in GSP Year 1, 2, and 3 are all eligible for Grant Funding through DWR.

* Management Cost includes Agency Staff salary and benefits

** Administrative Expenses includes Office Space Rental, Utilities, Supplies, and Liability Insurance

*** All PMAs estimates are based on costs described in Chapter 4 for Baseline PMAs and run through 2026 to align with potential Grant funding, assumes no additional PMAs required, and no Undesirable Results in MGB. Includes $15,000/year for MGB Model Updates in GSP Year 4 and 5.

5.3.1 Funding Sources

Funding for GSP Implementation has not been definitively determined but is anticipated to consist of similar sources as used for GSP development which includes a property fee and grant funding. The MBGSA's 2020 5-year fee schedule establishes the parcel fee by year and is collected semiannually on the County of Santa Barbara property tax roll for all parcels that reside over the MGB. This fee schedule, if determined adequate, could be used to cover a portion of the estimated costs for the first couple years of GSP implementation. Alternatively, the MBGSA could consider an updated Cost of Service Analysis and associated Fee determination if necessary. In addition to the parcel fee, the MBGSA applied for grant funds for implementation activities through the DWR Proposition 68 Sustainable Groundwater Management (SGM), Round 2 Grant program (DWR 2022). A grant award determination is expected in mid-2023. Estimated costs for GSP implementation through 2028 and how they compare with current and potential future funding sources are presented in Tables 5-3.

Table 5-3. GSP Implementation Planning-Level Cost Estimates and Funding Sources (2023 - 2028)

GSP Year	Fiscal Year	Total Estimate Expenses	SGM GSP Imp. Grant Reimbursement Estimates*	Prop. 218 2020 GSA Parcel Fee Revenue**	Variance Favorable (Unfavorable)	Net Impact Favorable (Unfavorable)
1	2024	$(1,305,800)	$790,800	$801,739	$286,739	$286,739
2	2025	$(1,862,500)	$1,330,500	$818,455	$286,455	$573,194
3	2026	$(1,467,700)	$916,700		$(551,000)	$22,194
4	2027	$(799,000)			$(799,000)	$(776,806)
5	2028	$(1,000,000)			$(1,000,000)	$(1,776,806)
	Total	**$(6,435,000)**	**$3,038,000**	**$1,620,194**	**$(1,776,806)**	

Notes: Does not include Groundwater Augmentation Program costs;

* Assumes 100% SGM, Round 2 Grant Award for GSP Annual Reporting, Ongoing Groundwater Monitoring Program, and Projects and Management Actions in GSP Year 1, 2, and 3 from DWR. Does not contain $45,000 for Residential Infiltration Projects Incentive Program as it is ineligible for Grant reimbursement.

** Year 4 and 5 of GSA Parcel Fee

5.5 ANNUAL REPORTING

Section 356.2 of the GSP Emergency Regulations requires that annual reports be provided to DWR by April 1 of each year following adoption of the GSP. For the MGB, the first annual report is due to DWR by April 1, 2024. The MBGSA intends to submit these reports in accordance with DWR requirements. These reports will, at a minimum, present the required components pursuant to CCR Section 356.2 including the following:

- General information, including an executive summary and a location map depicting the basin, jurisdictional boundaries, and Subbasin covered by the report.
- A detailed description and graphical representation of:
  - Groundwater elevation data from wells identified in the monitoring network
  - Groundwater extractions for the preceding water year
  - Change in groundwater in storage

  - Surface water supply used or available for use
  - Total water use
- A description of progress with GSP implementation.

Relevant data, as presented in Section 3.5 – Monitoring network will be used to prepare the GSP annual reports. Groundwater elevation information will be presented graphically by hydrographs including available historical data for key wells and groundwater elevation contour maps (similar to those included as Figures 2-17 to 2-20) illustrating, at a minimum, seasonal high and low groundwater conditions. A written description and interpretation of water year type (Section 2.2.1.1 – Precipitation) and the influence of climate and groundwater extractions on water levels will accompany the graphics. Tabular groundwater extraction data from MWD will be reported and include a description of the methods used to measure/estimate total production in the MGB. Surface water supplies including from those described in Section 2.1.1.2 – Water Agencies Relevant to the Plan Area will be reported in a tabular format along with a written description of the primary influences on availability. The results of surface water flow monitoring will be presented in tabular or hydrograph form. Total Water use will be reported in tabular format. In addition, annual and cumulative change in groundwater in storage will be reported in tabular and graphical form, illustrating the relationship between recent water usage trends and total volume of groundwater in storage in the MGB.

Annual reports will be made available to the public and MGB stakeholders through the methods described in Section 2.1.7, Notice and Communication, including posting to the MBGSA website, email announcements, and/or newsletters.

5.6 PERIODIC EVALUATIONS

The MBGSA will evaluate the GSP and the sustainability status at least every five (5) years and whenever the GSP is amended. Each 5-year evaluation will be provided as a written assessment to DWR and will describe whether GSP implementation, including implementation of projects and management actions, are suitable to maintain a sustainable Basin, and fill any data gaps identified in the MGB. The evaluations will include the following:

- A description of current groundwater conditions for each applicable sustainability indicator relative to measurable objectives and minimum thresholds.
- A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions.
- Revisions, if any, to the MGB setting, definition of undesirable results, minimum thresholds, or measurable objectives.
- An evaluation of the MGB setting, considering significant new information and data related to the hydrogeologic conceptual model, land, or water use, and a discussion of any significant changes.
- An evaluation of the MGB monitoring network including RMPs added or replaced and the suitability of the network to monitor sustainability conditions and fill any identified data gaps.
- A description of significant new information that has been made available since GSP adoption, amendment, or the last 5-year evaluation.
- A description of relevant actions taken by the MBGSA, including a summary of regulations or ordinances related to management of the MGB or the GSP.
- Information describing any enforcement or legal actions taken by the MBGSA in furtherance of the sustainability goal for the Plan Area.

The MBGSA intends to implement the Projects and Management actions outlined in Chapter 4 of this GSP over the next 5 years. The next 5-year evaluation will include an update on the status of each Project and Management Action defined in the prior GSP, the data obtained or expected, and its impact on the overall management of the MGB. Also included in the 5-year evaluation will be a discussion of the data and information obtained toward the establishment of sustainable management criteria for the interconnected surface water/groundwater sustainability indicator.

5.7 REFERENCES CITED

23 CCR (California Code of Regulations) 356.2 Annual Reports. In Subchapter 2: Groundwater Sustainability Plans.

California Department of Water Resources (DWR). 2022. *Sustainable Groundwater Management Program -SGMA Implementation Round 2.* https://water.ca.gov/work-with-us/grants-and-loans/sustainable-groundwater.

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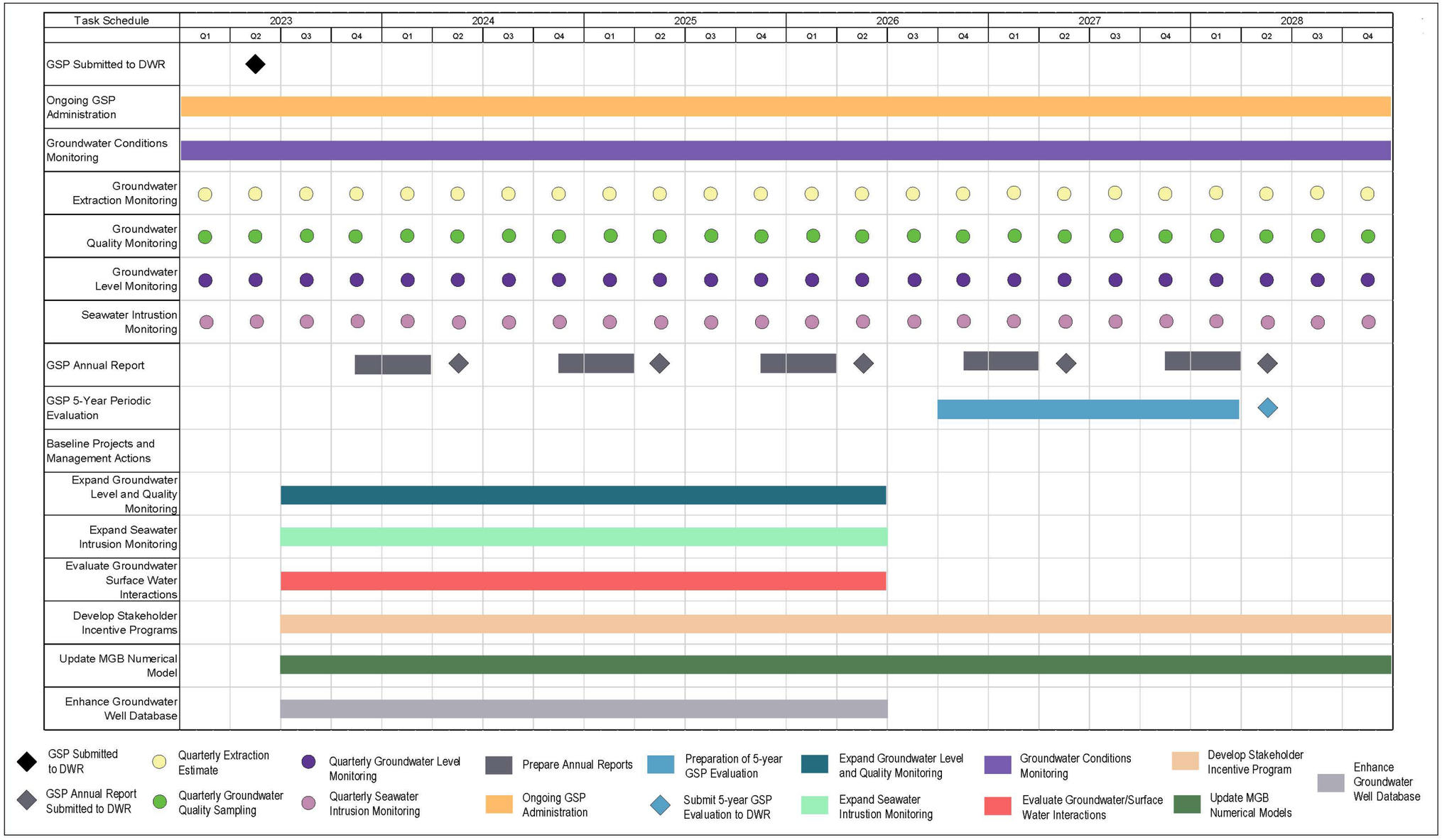

FIGURE 5-1

GSP Implementation Schedule

Groundwater Sustainability Plan for the Montecito Groundwater Basin