



NORTH AMERICAN SUBBASIN Groundwater Sustainability Plan

Public Draft

Section 11: Notice and Communications

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11. Notice and Communications

This section describes the North American Subbasin (NASb) Groundwater Sustainability Agencies' (GSA) noticing and communication with stakeholders and interested parties during the development and then during implementation of this Groundwater Sustainability Plan (GSP). The regulatory requirements and additional State guidance were provided in DWR's GSP Guidance Document: Stakeholder Communication and Engagement (DWR 2018). Under the requirements of the SGMA, GSAs must consider interests of all beneficial uses and users of groundwater. Furthermore, the GSP Regulations require that GSAs document the opportunities provided for public engagement and active involvement of diverse social, cultural, and economic elements of the population within the Subbasin during develop of this GSP.

11.1 Public Engagement and Active Involvement

Early in the GSP development process, each GSA developed a Communication and Engagement Plan, or C&E Plan, that described how stakeholders would be engaged through outreach, education, and opportunities for input during development of the GSP. The C&E Plans included key elements such as:

- Goals and Desired Outcomes
- Stakeholder Identification
- Venues for Engaging
- Implementation Timeline

The GSAs established and maintained an Interested Parties list to receive notices regarding plan preparation. To comply with this section, the GSAs maintain an email notification database. The public is regularly informed through engagement activities on how they can request to be placed on the list and receive notifications. Currently the Interest Parties list has over 330 subscribers.

The GSAs used a variety of methods to communicate with the public and encourage participation throughout GSA formation and GSP development as outlined in the C&E Plans and summarized below. When COVID-19 restrictions went into effect in 2020, some adjustments had to be made, such as switching from in-person public meetings to virtual meetings, pursuant to Executive Order N-25-20. Other than that, the C&E Plans were implemented as written and included the following engagement methods:

- Notifications – The GSAs used multiple methods to keep stakeholders informed of the GSP development process and aware of opportunities to engage. These methods included email blasts, website postings, social media, mailers and other printed information such as a SGMA brochure for distribution at public counters and outreach events and postcard mailers announcing the public comment period. A NASb website was developed, which

included a communications portal where interested parties could sign up for notifications and from which email notifications could be sent. Ultimately, over 330 parties received GSP updates, public meeting notifications, invitations to comment, and other notices via email.

- Websites – Single-entity GSAs maintained information on SGMA and GSP development on their agency websites. The West Placer GSA formed an independent website (westplacergroundwater.com) to post information on GSP-specific activities. In addition, a new NASb website (nasbgroundwater.org) served as the main hub for information on the GSP, providing opportunities for the public to sign up for electronic notices, learn about SGMA, the GSAs, the GSP, how to attend events, access and comment on the draft GSP, and contact their GSA representative.
- Public Meetings – The GSAs held several public meetings during GSP development. These meetings included GSA agency board/council meetings, Agriculture Commission meetings, water agency meetings, and larger, multi-GSA coordinated events to discuss GSP development in depth. Public meetings are discussed in Section 10.3.
- Board, Neighborhood, or Community Meetings – Individual GSAs engaged the public through various other meetings opportunities where appropriate, such as board/council meetings, committee meetings, municipal advisory committees, and others.
- Targeted Engagement – Where appropriate, the GSAs conducted targeted engagement with specific groups. In the NASb, one of the primary beneficial users of groundwater is the agricultural community. Therefore, targeted meetings were held to engage the agricultural community through tailgate meetings and presentations at public venues such as Agriculture Commission meetings.

Stakeholder input received through these methods helped the GSAs guide development of the draft GSP. In the early development, most input was in the form of questions or concerns regarding how the GSP might affect them. As input was received, the GSAs acknowledged the input and/or concerns, answered the questions, and strived to keep the public informed of how their input influenced the GSP development.

11.2 Groundwater Beneficial Uses and Users

SGMA requires the GSAs consider the interests of beneficial users and uses of groundwater in the Subbasin. As a result, the GSP development process needed to consider effects to other stakeholder groups in and around the groundwater Subbasin with overlapping interests including holders of overlying groundwater rights, including, but not limited to, the following:

- 1) Agricultural users, including farmers, ranchers, and dairy professionals.
- 2) Domestic well owners.
- 3) Municipal well operators.
- 4) Public water systems.

- 5) Local land use planning agencies.
- 6) Environmental users of groundwater.
- 7) Surface water users, if there is a hydrologic connection between surface and groundwater bodies.
- 8) The federal government, including, but not limited to, the military and managers of federal lands.
- 9) California Native American tribes.
- 10) Disadvantaged communities, including, but not limited to, those served by private domestic wells or small community water systems.
- 11) Entities that are monitoring and reporting groundwater elevations in all or a part of a groundwater basin managed by the groundwater sustainability agency.

Early in GSP development, the GSAs worked to identify the individuals and groups in their areas that would have interest in groundwater. A broad list of potential beneficial uses and users and parties representing those interests is shown in **Table 11-1**.

Table 11-1. Beneficial Uses and Users

Category of Interest	Parties Representing Interests	Engagement Purpose
General Public	Citizen Groups Community Leaders Municipal Advisory Committees	Inform to improve public awareness of sustainable groundwater management
Land Use	Municipalities (City/County Planning Regional Land Use Agencies	Consult and involve to promote land use policies that support GSPs
Private / Domestic Users	Private / Rural Pumpers Domestic Users	Inform and involve to minimize negative impact to these users
Urban / Agricultural Users	Water Agencies Irrigation Districts Mutual Water Companies Resource Conservation Districts Farm Bureaus	Collaborate to promote sustainable management of groundwater
Industrial Users	Commercial and Industrial Self Suppliers Local Trade Associations or Groups	Inform and involve to avoid negative impact to these users
Environmental	Federal and State Agencies Environmental Groups Wetland Managers Conservation Plans, Districts Resource Conservation Districts Land Trusts School Farm Departments	Inform and involve to avoid negative impact to the environment
Economic Development	Chambers of Commerce Business Groups / Associations Elected Officials State Senators and Assembly Members	Inform and involve to support a stable economy
Human Right to Water	Disadvantaged Communities Small Water/Community Systems Environmental Justice Groups	Inform and involve to provide a safe and secure groundwater supplies to all communities reliant on groundwater
Tribes	Federally Recognized Tribes Other Tribes with Land Interest	Inform, involve and consult with tribal government
Federal Lands	Federal Governments Military	Inform, involve and collaborate to ensure basin sustainability
Integrated Water	Flood Agencies Regional Water Management Groups	Inform, involve and collaborate to improve regional sustainability

The categories referenced above are broad examples; the GSAs considered each of the interest groups named to determine if they were present within the NASb. Below is a discussion of some of the beneficial users and uses of groundwater that were considered and contacted during development of the GSP. More detailed information regarding how they were considered specifically during development of sustainable management criteria is described in **Section 8 – Sustainable Management Criteria**.

11.2.1 Agriculture

Through preliminary stakeholder identification and engagement efforts the agriculture community was identified as a major beneficial user of groundwater in the Subbasin. Although Sacramento County and the southeastern portion of Placer County contain mostly urban areas, the rest of the Subbasin is predominately agriculture and undeveloped land. Permanent crops dominate the western, eastern, and northern edges of the Subbasin and along the rivers, while rice and other non-permanent crops dominate the central and western portions of the Subbasin. While much of the agriculture community relies on surface water to irrigate pastures, orchards, rice fields, and farms, many also pump groundwater to augment their surface water supplies, particularly in dry years. Therefore, the NASb GSAs included the agriculture community in their engagement plans early in GSP development – e.g. included agriculture representatives such as Farm Bureaus, Farm Advisors, and Agriculture Commissioners in their stakeholder lists and identified and added members of the agriculture community to interested parties lists.

In 2016, during the formation of the WPGSA, a stakeholder assessment was conducted for the purposes of guiding communication strategies and tactics associated with the formation process. Agriculture was identified as having a key interest in groundwater, so West Placer GSA agencies immediately engaged these stakeholders, holding 12 interviews with members of the agricultural community to hear their concerns and input. In addition, the Agricultural Commissioner was brought in as a member of the West Placer GSA technical working group. Throughout development of the GSP, the agricultural community was engaged through email notifications, postcard mailings, updates at Agriculture Commission and Farm Bureau meetings and focused in-person tailgate meetings. The West Placer GSA will continue to inform and engage the agricultural community throughout the GSP implementation.

Similarly, within the South Sutter Water District (SSWD) GSA boundaries agriculture accounts for the vast majority of water use. SSWD is a conjunctive use agricultural water district. Approximately one-third of water used by landowners in the district comes from stored surface water with the remaining two-thirds being pumped groundwater. Throughout the GSP development process, SSWD engaged its stakeholders via newspaper announcements, postcard notifications, and public meetings; both in-person and virtual. The SSWD Board of Directors, all of which are landowners and water users within the SSWD GSA, are updated on GSP activity regularly at monthly board meetings. SSWD will continue to actively engage with stakeholders moving forward.

The other GSAs engaged agricultural users as appropriate for their GSA, and consistent with their C&E plans, through public meetings, board updates, online information, letters, direct mailers, and other methods.

11.2.2 Non-municipal Domestic Well Users

Domestic wells are used to supply groundwater to households in both urban and rural areas, and are scattered through the Subbasin **Figure 3-13** show the density of domestic wells per square mile (outlines of DAC and SDAC communities are also shown on the domestic well density figure). The GSAs reached out to and consulted with domestic users through the activities described in their C&E Plans. Additionally, the monitoring network was developed with consideration of the locations of domestic wells (*refer to Section 7.4.2 – Domestic Well Representative Monitoring Network*) and sustainable management criteria were specifically developed to be protective of domestic wells; see **Section 8 – Sustainable Management Criteria** for details.

11.2.3 Small Water Systems

As noted in **Section 3.3.6 – Water Agencies**, there are multiple small community water and non-community non-transient water systems in the Subbasin that are overseen by the counties and the state. Their water supplies are from groundwater. Local permitting agencies were identified as stakeholders and received GSP notices. In addition, postcard mailers with information on how to review and comment on or participate in the GSP were sent directly to the small public water system operators.

11.2.4 Environmental Users of Groundwater

As described in **Section 3.7.4 – Environmental**, the Subbasin includes several creeks, streams, ponds and marshes support more than 40 species of native and nonnative fish, including naturally spawning fall-run Chinook salmon, steelhead, and American shad. The banks of the many rivers and streams within the Subbasin provide riparian habitat, both scrub and forest consisting of cottonwood, valley oak, and willow, with occasional white alder, box elder, and Oregon ash. To ensure environmental users, including groundwater dependent ecosystems (GDEs), were adequately considered a thorough evaluation was performed for GDEs as documented in **Appendix O**. SGA also reached out to The Nature Conservancy, Environmental Defense Fund, and the Groundwater Leadership Forum and discussed the approach and development of sustainable management criteria.

11.2.5 Disadvantaged Communities

As mentioned in **Section 3.6 – Disadvantaged Communities**, there are disadvantaged communities (DACs and SDACs) in the Subbasin that were identified using DWR’s DAC mapping tool. **Figure 3-8** shows their locations. Most are located within Placer and Sacramento

Counties. Those within Sacramento County are located within urban areas, while those in Placer County are in rural areas. Those disadvantaged communities in Sacramento County and in the southern portion of Placer County are mostly provided drinking water by water agencies, but some still rely on domestic wells. Water delivered to these customers by water agencies is regularly sampled and tested to ensure it meets or exceeds all state and federal drinking water standards. Outreach to these communities was provided through water agency board meetings, notices, and/or direct mailers and other methods. Most DAC areas in the northern portion of Placer County do not have water service and rely on domestic wells other than those communities near City of Lincoln, which have water service from the City of Lincoln. Some users in communities near City of Lincoln have water service from the City of Lincoln. The community of Sheridan is also served by a community water system. Outreach to these areas was done through social media, community meetings, municipal advisory meetings, and direct mailers.

11.2.1 Tribes

The United Auburn Indian Community (UAIC) has jurisdiction over land in Placer County southeast of Lincoln and northeast of Sheridan. These lands are exempt from SGMA. **Figure 3-2** in **Section 3 – Plan Area** shows the tribal lands in the Subbasin. The West Placer GSA reached out to the UAIC prior to GSP development and has included them on the public stakeholder list for notification of all GSP development activities.

11.3 List of Public Meetings

The individual GSAs conducted numerous public meetings during GSA formation and throughout GSP development to explain the requirements of SGMA, discuss the GSP regulations and proposed content, and solicit input from the public. This section focuses primarily on the public meetings that were held once key information for the GSP became available, such as the results of the groundwater modeling and water budget, and proposed sustainable management criteria, and projects and management actions.

A full list of public engagement activities, including all public meetings, are included in **Appendix S**. It should be noted that this is not an exhaustive list, as many of the water agency GSAs have standing agenda items to report on SGMA-related updates to their boards or various committees.

11.3.1 Draft GSP

The GSAs conducted public meetings at various times throughout GSP development, culminating in a three-meeting virtual series of coordinated, Subbasin-wide public meetings in spring of 2021 prior to the Public Draft GSP release and one Subbasin-wide public meeting during the Public Draft GSP review period on September 8, 2021. At each meeting, GSA representatives gave a general overview of SGMA and GSP requirements, GSP development and

content, as well as an overview of the GSP development timeline, before focusing on the specific meeting topic. Representatives from each GSA in the basin were present to answer questions. Notices were provided through a variety of methods and consistent with C&E Plans, including email blasts to over 330 stakeholders and interested parties. Prior to these meetings, in November 2020, draft GSP Sections 1 through 5 were posted for public comment on the NASb website along with a recorded PowerPoint presentation and a written overview of the sections' contents to guide the reader. Comments to the sections were accepted via the online portal at nasbgroundwater.org or by mail.

Below is a summary of the three basin-wide public meetings, which were all held via Zoom.

- **Workshop #1 - SGMA and Sustainable Management Criteria (February 10, 2021)** – In this first meeting, the GSAs provided an overview of SGMA, the draft sections (1 through 5) recently completed and released for public review and comment, and the GSAs' efforts to define groundwater levels and other criteria to measure sustainability in the basin. This event had 69 attendees.
- **Workshop #2 - Water Budget (March 10, 2021)** – In this second meeting, the GSAs presented the results of the Subbasin wide groundwater model and groundwater budget, explaining how the water budget will provide stakeholders a good understanding of the Subbasin, assist the GSAs in long range planning as well as fine-tuning of sustainable management criteria, and help determine how much water can be safely pumped from the Subbasin while remaining sustainable. This event had 72 attendees.
- **Workshop #3 - Projects and Management Actions (May 12, 2021)** - In this third meeting, the GSAs discussed refinements to the sustainable management criteria, approach to defining undesirable results, and the proposed projects and management actions that will potentially be included in the GSP and that could be implemented should the Subbasin become unsustainable, or at risk of becoming unsustainable, as indicated by the results of the above-mentioned monitoring of water groundwater conditions. This event had 47 attendees.

The two-hour meetings allotted time for questions and comments from the public. All workshops were recorded, and the videos were posted online at nasbgroundwater.org. Additionally, the Q&A and Chat questions were downloaded, and transcripts were compiled to document verbal comments. Around this time, many of the GSAs brought updates to their boards and councils and at other community venues to inform them of the GSP status, GSP content, and the public review process.

A final public meeting was held on Zoom on September 8, 2021, shortly after the Public Draft GSP was released for public review on August 31, 2021. A workshop to provide an overview of the updates to the GSP since Workshop #3, pertinent details and requests to the public to comment on the plan.

11.3.2 GSP Hearings and Adoption

Each GSA, including individual GSA member agencies where required (when GSA is not a JPA), adopted the GSP at a public meeting and after a public hearing, pursuant to California Water Code Section 10728.4.

11.4 GSP Comments and Responses

GSP regulations require GSAs to consider stakeholder input and the DWR must, in their evaluations, consider whether GSAs have adequately responded to comments that raise credible technical or policy issues with the GSP. Pursuant to SGMA, the five GSAs solicited and will respond to comments from the public on the Public Draft GSP. On numerous occasions prior to and during development of the GSP, information about the GSP was released to the public and comments were solicited. With each release of information, public notices were sent through a variety of methods, consistent with C&E Plans, and public meetings were held. Comments were accepted both electronically via the website and during public meetings. This section discusses comments received during key points in GSP development.

In November 2020, partial drafts of Sections 1 through 5 were released to the public on the NASb website and a 30-day comment period was provided. Comments were accepted online via the comment portal at nasbgroundwater.org and by mail. A list of comments and how they were considered can be found in **Appendix T**.

A Public Draft of the GSP, with previous public comments incorporated was prepared and released on the NASb website on August 31, 2021, and a 60-day comment period was provided. The Public Draft GSP was noticed on the website, through social media, mailers, print outreach, and an e-mail blast was sent to over 300 stakeholders and interested parties notifying them of the document availability. Comments were accepted online via the comment portal at nasbgroundwater.org. A list of comments and how they were considered can be found in **Appendix T**. Additional details about the comments will be provided upon completion of this comment period.

Prior to adoption, the GSAs also filed a Public Notice of Proposed GSP Adoption to notify cities and counties in the NASb plan area. GSAs must review and consider comments from any city or county that receives notice pursuant to this section and shall consult with a city or county that requests consultation within 30 days of receipt of the notice. Additional details about the comments received from any city or county will be provided upon completion of notice period.

It should be noted that in addition to the formal comment periods mentioned above, input from the public was sought and received in various ways throughout GSP development, including verbally at public meetings. All public outreach informed the public how they can reach their GSA representatives to ask questions or provide input by phone, email, or in writing.

Input from the public on the GSP was handled in three different ways depending on how the information was submitted. It should be noted that most comments during public meetings were in the form of questions or requests for clarification.

- Verbal Comments – If the input was received in a broad context, changes to the GSP were made if they were specific or relevant to a section of the GSP and if they raised credible technical or policy issues. If received in the form of questions, various portions of the GSP may have been changed to provide better clarification.
- Website Comments – If the input was submitted via the website, raised credible technical or policy issues, and provided specific sections, paragraph and line, these comments were downloaded into a table format and a response placed opposite each comment that indicates if the change was made to the GSP. If a similar comment raised the same issue and/or was previously addressed in a different section of the GSP, or if the comment was too general in nature, the comment was noted but no changes were made.
- Written Comments – If the input was received in letter or email format, the comments were dissected and placed into the table format described above, along with if and how the GSP was modified or clarified. If a similar comment raised the same issue and/or was previously addressed in a different section of the GSP, or if the comment was too general in nature, the comment was noted but no changes were made.

As mentioned, **Appendix T** provides a table with public comments to draft GSP Sections 1 through 5 and those to the Public Draft GSP and how the comments were addressed. Comments from the public were not responded to if their comments did not raise credible technical or policy issues with the GSP.

11.5 GSAs Decision Making Process

The Subbasin is managed by five GSAs that have jointly developed this coordinated GSP. A description of each GSA's organization and management structure can be found in **Section 2.1 – GSA Organization and Structure**. All GSAs are comprised of local agencies authorized to exercise powers related to groundwater management under California Water Code Section 10721.

- Sacramento Groundwater Authority GSA - This SGA is a Joint-Powers Authority that manages groundwater in Sacramento County north of the American River. The joint-powers agreement signatories chose to manage the basin cooperatively by creating a governing board of directors comprised of representatives of 14 water agencies and other water users within their jurisdiction. GSA decisions must be approved by a majority of this board.
- Reclamation District 1001 GSA - The Reclamation District (RD) is a special-purpose district governed by elected board members who own property or work on land in RD 1001. RD 1001 has delegated certain activities regarding the implementation of SGMA

to the Pleasant Grove Verona Mutual Water Company through a separate MOA. GSA decisions must be approved by a majority of this board.

- South Sutter Water District (SSWD) GSA - South Sutter Water District (SSWD) is a public agency governed by an elected board of directors who are landowners within the district. GSA decisions must be approved by majority vote of the SSWD Board.
- Sutter County GSA - The Sutter County Board of Supervisors serves as the legislative body for Sutter County and is responsible for GSP preparation and implementation in the County; however, Sutter County has delegated certain activities regarding the implementation of SGMA to the Natomas Central Mutual Water Company through a separate MOA. GSA decisions must be approved by a majority of the Sutter County board.
- West Placer GSA - The West Placer GSA has no authority of its own. Placer County, the cities of Roseville and Lincoln, Placer County Water Agency, and Nevada Irrigation District formed the WPGSA through a MOA (with participation by the California American Water through a separate participation agreement). Each member agency assigned representatives to serve on the technical working group with certain decision-making abilities. However, certain actions, such as approval of the GSP, require the approval of the governing body of each WPGSA member agency.

This section provides a summary of their decision-making processes and key decisions made leading up to adoption of the GSP, including how the public was engaged.

11.5.1 GSA Formation

All five NASb GSAs executed a Memorandum of Agreement (MOA) on January 31, 2017 to fund and develop a single GSP for the NASb. During GSA formation, and as the GSAs began to meet to develop this GSP, the GSAs offered numerous opportunities for public engagement:

- GSA Formation Public Notice – Each public agency desiring to form a GSA published a notice of public hearing.
- GSA Formation Public Hearing – Before deciding to become a groundwater sustainability agency, and after publication of notice pursuant, the local agencies each held a public hearing in the county or counties overlying the Subbasin.

In addition to these two mandatory activities, the GSAs engaged the public prior to and during the GSA formation process through various activities such as public workshops and other public venues (e.g. Municipal Advisory Committees, City Councils, County Board of Supervisors, Water Agency Directors, Agricultural Commission and others) to inform groundwater users and other interested parties of GSA formation and SGMA requirements, as well as to identify potential participants and other stakeholders to engage during the GSP development phase.

11.5.2 GSP Initial Notification

GSP regulations require GSAs to submit an Initial Notification to DWR prior to GSP development. SGA, as the lead agency for the NASb, and pursuant to the above-mentioned MOA, filed the Initial Notification on behalf of the five NASb GSAs on September 24, 2018. While there are no formal adoption requirements for Initial Notification, the GSAs notified the public through various methods, including public meetings, of the Initial Notification and opportunity to comment to DWR. The public was engaged during this process via notifications prior to and after filing of the Initial Notification.

11.5.3 GSP Adoption and Submittal to DWR

The GSAs offered numerous opportunities for public engagement, including but not limited to the following key decision points pursuant to California Water Code Section 10728.4:

- Public Notice of Proposed Adoption – Prior to adopting a GSP, GSAs must provide notice to a city or county within the area of the proposed plan or amendment. Notices to be released in November 2021.
- GSP Adoption Public Hearing – A GSA may adopt a Final GSP after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment.

Following the required notifications and public hearings, and after consideration of any comments and consultations, the GSA agencies adopted the GSP in December 2021.

11.5.4 GSP Review and Evaluation

Once the Final GSP is submitted, any person may provide comments to DWR via the SGMA Portal. The GSA's will inform stakeholders of the GSP submittal and DWR's public comment process and online public comment portal during the workshop on September 8, 2021.

11.5.5 GSP Implementation MOA

At the time the GSAs adopt the GSP, they will also agree to the Implementation MOA to fund and coordinate GSP implementation activities, including ongoing outreach and stakeholder engagement. In general, each of the GSAs in the Subbasin will be responsible for sustainably managing their portion of the Subbasin and contributing funds for GSP implementation, including basin-wide management activities, public engagement, annual reports, and five-year GSP updates. Each GSA approved the MOA (see Appendix A) at a publicly noticed meeting.

11.6 Informing the Public During GSP Implementation

The GSAs plan to continue public outreach and stakeholder engagement through the GSP implementation phase through various activities, including an annual public meeting to release the results of the Annual Report and the status of projects and management actions. As mentioned, the NASb agencies agreed to coordinate and fund GSP implementation activities through a MOA. The MOA also contains provisions for funding and implementing outreach activities, and the GSAs agreed to, at a minimum:

1. Provide for the consideration of all interests of legal users of groundwater within the NASb. To that end, the GSAs intend to update and seek input from the public and other interested stakeholders as part of GSP implementation and overall SGMA compliance.
2. Hold at least one annual NASb public meeting to inform and update stakeholders on NASb activities and basin wide conditions.
3. Develop public outreach materials and maintain and update the public website (nasbgroundwater.org). The website will be used to inform the public about NASb activities and meetings, provide a portal for the public to provide comments to the NASb GSAs, and include information for each GSA.

With adoption of this GSP and the MOA, public involvement will continue through activities in the GSA individual C&E Plans along with Subbasin-wide public meetings coordinated by the Lead Agency, SGA. Nothing within the MOA precludes the individual NASb GSAs from holding additional public stakeholder meetings or conducting their own public engagement activities, consistent with their C&E Plans.

In addition, to comply with the statutory requirements for public engagement during implementation of this GSP, the GSAs will engage the public through:

- Public Notices and Meetings
 - Before amending a GSP
 - Prior to imposing or increasing a fee
- Encouraging Active Involvement