

**TAC Discussion Summary**  
**2020 vs. 2022 timeline for GSP-development**

Discussion held September 13, 2017

*Summary compiled by the Consensus Building Institute*

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At its September 13 meeting, the Cosumnes Subbasin Technical Advisory Committee discussed the merits and challenges of accelerating the timeline for development of the Cosumnes Subbasin groundwater sustainability plan (GSP) from January 31, 2022 (standard SGMA deadline for GSP-development in medium- and high-priority groundwater basins\*) to January 31, 2020 (SGMA deadline for GSP-development in critically overdrafted basins, including the Eastern San Joaquin Subbasin to the south of the Cosumnes Subbasin).

Assuming that GSP-development begins in early 2018 (when Prop. 1 funds become available) and is completed by the January 31, 2022 deadline, the subbasin would have approximately four years for GSP development. Shifting to the 2020 deadline would cut the time available for GSP development to two years.

TAC members were asked to share their views on the merits and/or disadvantages of shifting to an accelerated timeline. Below is a synopsis of the views expressed. The issue is to be discussed again at the September 20 Working Group meeting.

Pros of Accelerated Timeline	Cons of Accelerated Timeline
<ul style="list-style-type: none"> <li>• Keep pace with Eastern San Joaquin subbasin’s 2020 GSP development timeline, thereby ensuring the Cosumnes Subbasin isn’t disadvantaged in cross-basin coordination</li> <li>• DWR will provide technical support services in the future. The Cosumnes may receive priority funding if the subbasin is shovel-ready earlier than its 2022 deadline.</li> <li>• GSP preparation will likely be more cost-effective (i.e. shorter timeframe, lower consultant costs, fewer meetings, etc.)</li> <li>• Subbasin can shift more quickly to local control/implementation</li> <li>• Timeline is a driver of efficiency; earlier deadline will focus participation and effort               <ul style="list-style-type: none"> <li>○ Regardless, the subbasin needs to collect data quickly so that the</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• GSP will include less certainty/more unknowns as there will be less time to evaluate and understand subbasin conditions               <ul style="list-style-type: none"> <li>○ Note: If the basin opts to stick with its 2022 filing deadline, several TAC members suggested frontloading the necessary technical work to foster cross-basin coordination consistent with ESJ’s 2020 filing timeline.</li> </ul> </li> <li>• May lose economies of scale as the implementation efforts may be more fragmented (e.g. monitoring network development)</li> <li>• More intensive work effort in the near-term; may overly tax GSA partners and short-circuit important fact-finding and dialogue</li> </ul>

\* The Cosumnes Subbasin is designated a medium-priority basin.

<p>process is not overly rushed at the end.</p> <ul style="list-style-type: none"> <li>• Potentially “lower bar” in Prop. 1 evaluation by demonstrating to DWR the subbasin’s <i>proactive and collaborative approach</i> to SGMA compliance. <ul style="list-style-type: none"> <li>○ Note: DWR’s Hong Lin commented that there is no “lower bar.” The evaluation does not include criteria for an accelerated timeline.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Likely to accelerate SGMA compliance timeline (20-year implementation starts when GSP is approved by DWR, not the initial 2022 filing deadline) <ul style="list-style-type: none"> <li>○ EKI and the Water Forum will seek clarification from DWR on this issue.</li> </ul> </li> <li>• There is no real reason to rush GSP-development -- besides “getting it over with.”</li> </ul>
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**Outstanding questions and necessary information:**

- How strong a GSP can the subbasin develop by 2020? Does accelerating GSP-development compromise GSP integrity? What are the vulnerabilities?
- If the Cosumnes’ GSP development timeline is not accelerated, is it possible to frontload analyses to ensure the Cosumnes can engage on key cross-border coordination issues prior to ESJ’s 2020 deadline? What would that require?
- Could the Prop. 1 proposal include a 2020 timeline in an open-ended way? **Or** would the subbasin be locked into adhering to the 2020 timeline and ultimately penalized if it fails to meet the early deadline?
- Hong Lin noted that E. San Joaquin received \$250k grant to proactively develop its model. She suggested inviting ESJ to again present on its current modeling work

**Timeframe for TAC/Working Group decision on this matter:**

The Working Group needs to determine GSP-development timeframe within the month, as the decision will impact the Prop. 1 budget. Though the overall scope will remain unchanged, a shorter timeframe will change the coordination scope and the associated cost.

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