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EAST BAY PLAIN SUBBASIN GROUNDWATER SUSTAINABILITY PLAN CHAPTER 3 – SUSTAINABLE MANAGEMENT CRITERIA

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LIST OF ACRONYMS AND ABBREVIATIONS

ACFCWD	Alameda County Flood Control and Water Conservation District	DTSC	California Department of Toxic Substances Control
ACPWA	Alameda County Public Works Agency	DWR	California Department of Water Resources
ACWD	Alameda County Water District	DWSAP	Drinking Water Source Assessment and Protection
AF	acre-feet	EBMUD	East Bay Municipal Utility District
AFY	acre-feet per year	EBP	East Bay Plain
ASR	aquifer storage and recovery	ft	foot, feet
B	benzene	GAMA	Groundwater Ambient Monitoring and Assessment
bgs	below ground surface	GCM	Global Climate Models
BTEX	benzene, toluene, ethylbenzene, and xylenes	GW	groundwater
CASGEM	California State Groundwater Elevation Monitoring Program	GDE	groundwater dependent ecosystem
CCR	California Code of Regulations	GMP	groundwater management plan
CWC	California Water Code	GP	general plan
DDW	California Division of Drinking Water	gpd	gallons per day

gpd/ft	gallons per day per foot	MO	Measurable Objective(s)
GSA	groundwater sustainability agency	MTBE	methyl tert-butyl ether
GSP	Groundwater Sustainability Plan	MT	Minimum Threshold(s)
Hayward	City of Hayward	PCE	perchloroethylene
HCM	hydrogeologic conceptual model	RMS	Representative Monitoring Sites
LBNL	Lawrence Berkeley National Laboratory	RWQCB	Regional Water Quality Control Board
LSCE	Luhdorff & Scalmanini Consulting Engineers	SFPUC	San Francisco Public Utilities Commission
LSCE Team	GSP consultant team: LSCE, Geosyntec, ESA, BC, Dr. Moran, and Farallon Geographics	SGMA	Sustainable Groundwater Management Act of 2014
LUST	Leaking Underground Storage Tank	SMCL	secondary MCL
MCL	maximum contaminant level	TAC	Technical Advisory Committee
µg/L	micrograms per liter	TCE	trichloroethylene
mg/L	milligrams per liter	TDS	total dissolved solids
MGD	million gallons per day	TM	Technical Memorandum
MSL	mean sea level	TNC	The Nature Conservancy
		TPH	total petroleum hydrocarbons
		USGS	United States Geological Survey
		WCR	well completion report

3. SUSTAINABLE MANAGEMENT CRITERIA

This chapter of the Groundwater Sustainability Plan (GSP or Plan) provides a discussion of the Sustainable Management Criteria (SMC), including: the sustainability goal, undesirable results, minimum thresholds, measurable objectives, interim milestones, and the monitoring networks for the six sustainability indicators within the Plan area encompassed by the two GSAs: East Bay Municipal Utility District (EBMUD) and City of Hayward (Hayward). These two GSAs (and the Plan area) comprise the entire 71,300 acres in the Subbasin. Undesirable results occur when significant and unreasonable effects for any sustainability indicator defined by the Sustainable Groundwater Management Act (SGMA) are caused by groundwater conditions occurring in the Plan area.

This chapter defines sustainability in the Plan area, and it addresses significant regulatory requirements for this GSP. The undesirable results (UR), minimum thresholds (MT), interim milestones (IM), and measurable objectives (MO) presented in this chapter define the future sustainable conditions in the Plan area and commit the associated GSAs (EBMUD and Hayward) to actions that will achieve these future conditions.

The development of and definitions for the SMC require considerable analysis and evaluation of many factors. This chapter presents the data and methods used to develop the SMC and demonstrates how they relate to beneficial uses and users. The SMCs presented in this chapter are based on the best available data and science

The EBP Subbasin has a history of consistent annual groundwater pumping volumes over the past 30 years of about 3,000 to 4,000 acre-feet per year (AFY), which is well below the initial estimate of sustainable yield of 12,500 AFY (see Chapter 2). The GSAs have no immediate plans to develop new groundwater supplies over the initial 10 years of the GSP Implementation Period; therefore, there is ample time to collect additional data and conduct further hydrogeologic analyses to refine the basis for long-term SMC.

As noted above and elsewhere in this GSP, data gaps and uncertainty exist in the characterization of the hydrogeologic conceptual model and groundwater conditions. The GSAs will periodically review and update this GSP, assess changing conditions in the Plan area that may warrant modifications of the GSP or management objectives, and may adjust GSP components accordingly. The GSAs will focus their evaluation on determining whether the actions under the GSP are meeting the Plan's sustainability goal.

This chapter is organized to address all the SGMA regulations regarding SMC and is organized in accordance with the California Department of Water Resources (DWR) GSP annotated outline. This chapter includes a description of:

- How undesirable results were developed, including:
 - The criteria defining when and where the effect of the groundwater conditions causes undesirable results based on a quantitative description of the combination of minimum threshold exceedances
 - The potential causes of undesirable results
 - The effect of these undesirable results on the beneficial uses and users

- How locally defined significant and unreasonable conditions were developed
- How minimum thresholds were developed, including:
 - The information and methodology used to develop minimum thresholds
 - The relationship between minimum thresholds and the relationship of these minimum thresholds to other sustainability indicators
 - The effect of minimum thresholds on neighboring basins
 - The effect of minimum thresholds on beneficial uses and users
 - How minimum thresholds are related to relevant Federal, State or local standards
 - The method for quantifying measurable minimum thresholds
- How measurable objectives were developed, including:
 - The methodology for setting measurable objectives
 - Interim milestones

The SMCs presented in this chapter were initially developed for the 2022 GSP using information from stakeholders, GSAs, public meetings, hydrogeologic analysis, groundwater-dependent ecosystem analysis, and GSA Technical Team representatives. The general process for establishing SMC included:

- GSA public meetings (i.e., Stakeholder Communication and Engagement Meetings) that outlined the GSP development process and introduced stakeholders to the SMC
- Development of draft proposed SMC by the consultant team, GSA staff, and GSA technical representatives
- Review of draft proposed SMC by GSA steering committees
- TAC meetings to review the initial proposed SMC for each sustainability indicator
- Reviewing TAC input on preliminary SMC methodologies with GSA Technical Team representatives
- Conducting GSP public meetings to present proposed methodologies to establish minimum thresholds and measurable objectives and receive additional public input. Two public meetings on SMC were held in the Plan area.
- Reviewing public input on preliminary SMC methodologies with GSA Technical Team representatives
- Providing the Draft GSP for public review and comment
- Establishing and modifying MT, IM, and MO, and definitions for UR based on feedback from TAC meetings, public meetings, public/stakeholder review of the Draft GSP, and input from GSA Technical Team representatives.

The SMCs in the 2022 GSP were reviewed by DWR, which resulted in some recommended corrective actions for the various SMC. The GSAs and their consultant team reviewed the recommended corrective actions and developed a refined SMC for some sustainability indicators to address the corrective actions.

Meetings were held with DWR and EBP Subbasin stakeholders to review and receive input on proposed revisions to SMC. This 2027 amended GSP includes updated SMC to reflect this additional work to address DWR corrective actions.

The EBP Subbasin is currently sustainable and pumps approximately a quarter of its estimated sustainable yield. Therefore, the GSAs have outlined potential future water supply development opportunities that are described in Chapter 4. To ensure the Plan area continues to meet its sustainability goal through 2042 and beyond, the GSAs have also proposed implementation actions as described in Chapter 4 that are intended to help identify and avoid UR. The potential future water supply development opportunities expected to be implemented will include wells for groundwater extraction (and possibly groundwater injection). Implementation actions are expected to include, but not be limited to, the collection of additional streamflow data and the installation of additional representative monitoring sites (RMS) at streams and GDE sites. The existing EBMUD Bayside well that had been developed for potential future injection and extraction was destroyed in 2026 because EBMUD's lease with Oro Loma Sanitation District was not renewed. EBMUD has no immediate plans to replace the Bayside well, but a replacement well remains a potential future supplemental water supply option if needed. Chapter 4 outlines various water supply development opportunities that may be considered in the future, pending development of more extensive monitoring networks and further evaluation of groundwater basin conditions that result from implementation actions. The overarching sustainability goal and the absence of UR are expected to be maintained through and beyond 2042 with the execution of the identified water supply development opportunities and implementation actions. The sustainability goal will be maintained through proactive monitoring and management by the GSAs as described in this and the following chapters. It should be noted that the potential water supply development opportunities referred to in this GSP are not Projects and Management Actions (PMAs), because PMAs are defined as being necessary to achieve sustainability. The EBP Groundwater Subbasin is not only already sustainable but has capacity for additional groundwater supply development; hence, the potential future water supply development opportunities referred to in this GSP represent potential future additional groundwater development well within the estimated sustainable yield, as opposed to PMA needed to achieve sustainability when the sustainable yield is already being exceeded.

Table 3-1 summarizes whether each of the six UR has occurred, is occurring, or is expected to occur in the future within the Plan area, with and without GSP implementation.

Table 3-1. Summary of Undesirable Results Applicable to the Plan Area

Sustainable Indicator	Pre-Historical Period (1950s to 1989)	Historical Period (1990 to 2015)	Existing Conditions (2016 to 2021)	Current Conditions (2022 to 2042)	Future Conditions without GSP Implementation (after 2042)	Future Conditions with GSP Implementation (after 2042)
Chronic Lowering of Groundwater Levels	No	No	No	No	No	No
Reduction of Groundwater Storage	No	No	No	No	No	No
Land Subsidence	No	No	No	No	No	No
Seawater Intrusion	Yes ¹	No	No	No	No	No
Degraded Water Quality	Yes ²	Yes ²	Yes ²	Yes ²	No ⁴	No ⁴
Depletion of Interconnected Surface Water	Yes ³	No ⁵	No ⁵	No ⁵	No	No

¹ Small local areas of seawater intrusion were reported in the Shallow Aquifer Zone near the San Francisco Bay margin prior to 1930, at which time EBMUD began importation of surface water supplies from outside of the EBP Subbasin.

² The Shallow Aquifer Zone has been impacted historically in localized areas and exhibits somewhat elevated concentrations of nitrate, chloride, and TDS.

³ There are major data gaps related to surface water/groundwater interaction and historical stream depletion. However, based on numerical model runs and available data, it is possible that there may have been a depletion of interconnected surface water that was sufficient to constitute undesirable results in the 1950s and early 1960s in the southern portion of the EBP Subbasin.

⁴ In this context, “No” means that with GSP implementation, existing degraded water quality conditions will not become worse as a result of the implementation of GSP water supply development opportunities.

⁵ There are major data gaps related to surface water/groundwater interaction and historical stream depletion. However, based on numerical model runs and available data, depletion of interconnected surface water since 1990 is significantly less than model results for the 1950s and early 1960s in the southern portion of the EBP Subbasin.

3.1. Sustainability Goal

(California Code of Regulations [CCR] Title 23, Section 354.24)

3.1.1. Sustainability Goal

The sustainability goal for the Plan area is to manage and protect the EBP Subbasin in a manner that avoids UR while continuing to collect and analyze data to support science-based decision making to evaluate new opportunities for sustainable groundwater beneficial uses. The six sustainability indicators have been assigned minimum thresholds and measurable objectives (and interim milestones) as set forth in this GSP to avoid UR and ensure continued sustainable groundwater management of the EBP Subbasin over the planning and implementation horizon.

3.1.2. Explanation of How the Goal Will Be Achieved in 20 Years

The sustainability goal is already being achieved, which has been the case since at least the 1970s. Over the next 20 years of the GSP implementation period, the sustainability goal will continue to be achieved by prudent, incremental use of existing approved groundwater extraction (and possibly injection) facilities. At this time, the GSAs have no plans to expand groundwater extraction facilities OR to replace the Bayside injection/extraction well, but the GSAs will continue data collection to provide current baseline conditions and evaluate potential impacts of incremental greater use of existing facilities and potential new facilities.

3.1.3. Description of Measures

Existing project facilities (e.g., Hayward Emergency Wells) are planned to continue operations in accordance with previous approval processes over the 20-year implementation period (2022 to 2042). The proposed potential future water supply development opportunities will result in groundwater injection and net groundwater extractions consistent with existing permit conditions to maintain net groundwater pumping well below sustainable yield through and beyond 2042. The potential future water supply development opportunities would also allow EBP Subbasin operations to remain sustainable over a 50-year period, representing average hydrologic conditions. If actual hydrologic conditions differ from the 50-year average (plus accounting for anticipated climate change), then additional measures may be necessary. The implementation of only the listed potential future water supply development opportunities will maintain pumping well below the sustainable yield and allow for ongoing data collection and analysis to further evaluate the potential for increased groundwater pumping.

3.2. Undesirable Results

(CCR Title 23, Section 354.26)

The regulations define UR as occurring when significant and unreasonable effects are caused by groundwater conditions occurring throughout the Subbasin for one or more sustainability indicators. This section provides a description of UR for the relevant sustainability indicators, including:

- Causes of groundwater conditions that would lead to UR

- Criteria used to define undesirable results based on MT
- Potential effects on the beneficial uses and users of groundwater, on land uses and property interests, and other potential effects that may occur or are occurring from UR

A summary of the criteria used to define UR is provided below in **Table 3-2**, and detailed discussions of each sustainability indicator are provided in subsequent sections of this Chapter.

Locally defined significant and unreasonable conditions presented in **Table 3-2** were determined based on discussions with GSA staff and technical representatives, input received from interested stakeholders and the public through public meetings, through individual stakeholder input to various GSA representatives, and through meetings with DWR.

Table 3-2. Summary of MT, MO, and Undesirable Results.			
Sustainability Indicator	Minimum Threshold	Measurable Objective ¹	Undesirable Result
Chronic Lowering of Groundwater Levels	Shallow Aquifer Zone: Spring groundwater level of 50 feet below ground surface; Adjustment in GDE areas to allow only a 7.5-foot decline in Water Table Aquifer Zone groundwater levels. Intermediate and Deep Aquifer Zones: Fall groundwater elevation of -50 feet MSL.	Average of recent observed high and low groundwater level measurements. Where recent observed data is not available – the average of recent modeled high and low groundwater levels.	25% or more RMS wells have levels below MT for two consecutive fall measurements.
Reduction of Groundwater Storage	Annual pumping volume of 12,500 AFY.	Annual pumping volume of 6,250 AFY.	Five-year moving average of annual pumping volumes greater than 12,500 AFY.

Table 3-2. Summary of MT, MO, and Undesirable Results.			
Sustainability Indicator	Minimum Threshold	Measurable Objective ¹	Undesirable Result
Seawater Intrusion	500 mg/L If baseline concentration exceeds or is within 20% of 500 mg/L, set MT at baseline concentration plus 20% <i>20% margin above baseline is based on the evaluation of 3 potential sources of fluctuations:</i> - Analytical lab methods - Sampling methods - Variability in the GW system	Average baseline conditions where data is available	Any sentinel well exceeding the MT for two consecutive years will constitute an undesirable result.
Land Subsidence	Current conditions of no long-term subsidence, and set at 0.1 foot of annual subsidence.	Current conditions of no long-term subsidence, and set at 0.1 foot of annual subsidence.	25% or more RMS sites below MT for two consecutive years.
Degraded Water Quality	<u>Nitrate</u>: 10 mg/L or existing baseline level plus 20% (whichever is greater) <u>Arsenic</u>: 10 µg/L or existing baseline level plus 20% (whichever is greater) <u>Chloride</u>: 250 mg/L or existing baseline level plus 20% (whichever is greater) <u>TDS</u>: 500 mg/L or existing baseline level plus 20% (whichever is greater).	Current concentrations (maximum of baseline sampling results) of nitrate, arsenic, chloride, and TDS.	25% or more RMS wells above the MT for the same constituent as a result of Subbasin groundwater extraction, based on the average of the most recent three-year period.

Table 3-2. Summary of MT, MO, and Undesirable Results.			
Sustainability Indicator	Minimum Threshold	Measurable Objective ¹	Undesirable Result
Depletion of Interconnected Surface Water	A two-foot decline in the Water Table Aquifer Zone groundwater levels beneath San Pablo and San Leandro Creeks.	Low end of range for recent observed high and low groundwater level measurements in the Water Table Aquifer Zone beneath San Pablo and San Leandro Creeks. Where recent observed data is not available – modeled groundwater levels were used.	50% or more RMS wells below MT for two consecutive spring measurements.

¹ Interim Milestones are equal to Measurable Objectives.

3.2.1. Chronic Lowering of Groundwater Levels

Causes and Effects on Beneficial Users and Uses: UR for chronic lowering of groundwater levels is defined as a significant and unreasonable decline in groundwater levels caused by excessive regional groundwater pumping over an extended period of time, resulting in loss of intended beneficial uses of existing water supply wells (drinking water, industrial, irrigation for large parcels) due to reduction of pumping capacity, or ongoing lowering of groundwater levels which significantly affect other beneficial uses (e.g., GDEs).

Minimum Threshold: The MT for Shallow Aquifer Zone groundwater levels is set at 50 feet below the current ground surface. The MT for Intermediate and Deep Aquifer Zone groundwater levels is set at -50 feet mean sea level (MSL). Adjustments to the Shallow Aquifer Zone MT will be made at RMS wells located adjacent to GDEs that are solely dependent on groundwater levels (e.g., not located near a stream or have roots extending below the stream thalweg where the stream is disconnected). In these areas, the MT for Shallow Aquifer Zone groundwater levels is set to 7.5 feet below existing/baseline conditions, and this will be updated (and potentially revised) pending additional hydrogeologic/biologic data collection and studies. The proposed MT requires the construction of dedicated shallow wells within potential GDE areas that are planned for future installation to serve as RMS wells. Additional details on the development of MT are provided in Section 3.3.

Criteria: An undesirable result is defined to occur when 25% or more of the RMS wells exceed the groundwater level minimum thresholds for the two consecutive Fall (October) readings. The technical justification for using 25% is reasonableness. If a very small percentage of wells were used (e.g., 10% or less), it would mean that a small number of wells falling below the MT (which may just be a very localized issue) would cause an undesirable result. Whereas, if a very high percentage of wells (e.g., 75%) were used, then a relatively large portion of the EBP Subbasin would already be impacted before an UR occurs. Using a percentage in the 20 to 50% range is a reasonable balance between not letting a very localized problem drive the definition of undesirable results and not allowing most of the EBP Subbasin to be impacted before

declaring an undesirable result has occurred. The selection of 25% is at the lower end of what is deemed a reasonable range.

3.2.2. Reduction of Groundwater Storage

Causes and Effects on Beneficial Users and Uses: UR for reduction of groundwater storage is defined as excessive regional groundwater pumping that causes a significant and unreasonable decrease in groundwater storage over an extended period of time, resulting in a significant reduction of pumping capacity to the extent that existing water supply wells (drinking water, industrial, irrigation for large parcels) are no longer viable for intended beneficial uses.

Minimum Threshold: The MT for reduction of groundwater storage is set at an annual pumping volume of 12,500 AFY, which is the estimated Subbasin sustainable yield. The MT will be updated (and possibly refined) as more data are collected and the sustainable yield is updated. This UR encourages total EBP Subbasin pumping to remain less than the estimated sustainable yield, including during average hydrologic conditions over the long-term and after full implementation of GSA potential future water supply development opportunities. Correspondingly, over the long-term, beneficial uses and users will have access to the groundwater in storage that exists in a balanced basin where inflows remain in balance with outflows. Increased pumping within the long-term sustainable yield during dry years may temporarily lower groundwater elevations and reduce the amount of groundwater in storage. Groundwater storage would then be replenished during wet years when pumping is decreased. Additional details on the development of minimum thresholds are provided in Section 3.3.

Criteria: A UR is defined to occur when the five-year moving average of groundwater pumping exceeds 12,500 AFY. The technical justification is that a shorter time, such as one or two years, does not account for the potential need for short-term greater pumping that may occur due to very extreme water shortage, due to natural disasters (e.g., earthquakes), and/or extreme drought conditions. However, a longer time frame for a moving average (e.g., 8 or 10 years) is excessive and unreasonable as a duration for extreme reliance on groundwater pumping for such conditions. The use of a five-year moving average provides a good balance between accounting for short-term extreme needs versus allowing for long-term overpumping of the EBP Subbasin. In addition, the best available data indicate the EBP Subbasin was historically pumped at levels exceeding the current initial GSP sustainable yield estimate for more than five years. Thus, the selected MT based on the five-year moving average is likely to have been exceeded historically without major reported consequences in terms of UR (i.e., the MT duration represents a conservative/low value).

3.2.3. Seawater Intrusion

Causes and Effects on Beneficial Users and Uses: UR for seawater intrusion is defined as excessive regional groundwater pumping that causes a significant and unreasonable inland migration of saline Bay water into existing freshwater aquifers that are or could be developed for water supply to the extent that increased groundwater salinity precludes beneficial use for drinking water. This migration of saline Bay

water would be identified through any sentinel well¹ exceeding the minimum threshold for two consecutive years.

Minimum Threshold: The MT is based on the concentration of chloride in the sentinel wells. The MT is set at 500 mg/L. However, if the baseline concentration at a sentinel well already exceeds this MT, then the MT is set at the baseline concentration plus 20%. This 20% margin above baseline is based on an evaluation of fluctuations from analytical lab results, sampling methods, and variability within the groundwater system as described in Section 3.3.5.1.

Criteria: A UR is defined to occur when any sentinel well exceeds an MT for two consecutive years. If an exceedance occurs, the GSA will conduct confirmation sampling to validate the exceedance. This definition for the UR ensures that any seawater intrusion is detected early and appropriate action is taken, as needed, to determine the cause.

3.2.4. Land Subsidence

Causes and Effects on Beneficial Users and Uses: UR for land subsidence is defined as excessive regional groundwater pumping that leads to the occurrence of inelastic subsidence that results in significant and unreasonable damage at a regional scale to public infrastructure critical for public health and safety (i.e., levees, flood control channels, water supply aqueducts). Locally defined significant and unreasonable conditions were determined based on discussions with GSA staff and technical representatives, input received from interested stakeholders and the public through public meetings, through individual stakeholder input to various GSA representatives, and through meetings with DWR.

Minimum Threshold: The land subsidence MT is based on comparing vertical displacement from Interferometric Synthetic Aperture Radar (InSAR) data and is set at an annual rate of 0.1 feet per year. This threshold takes into account the level of uncertainty associated with the InSAR satellite dataset. This is not meant to allow for a continued rate of 0.1 feet/year of subsidence in the Subbasin. Rather, this is an acknowledgment that there may be instances where measurement uncertainty will indicate a rate of subsidence that is within the noise of the data and is equivalent to no subsidence in the EBP Subbasin.

Criteria: A UR would occur if 25% or more RMS sites fall below the MT for two consecutive years. The technical justification for the use of 25% is reasonableness. If a very small percentage of RMS sites (e.g., 10% or less) were used, then a small number of RMS sites falling below the MT (which may just be a very localized issue) would result in an UR. If a very high percentage (e.g., 75%) was used, then a relatively large portion of the EBP Subbasin would already be impacted. Using a percentage in the 20 to 50% range is a reasonable balance between not letting a very localized problem drive the definition of UR and not allowing most of the EBP Subbasin to be impacted before declaring an UR has occurred. The selection of 25% is at the lower end of what is deemed a reasonable range. The UR definition also includes two

¹ A sentinel well is a designated monitoring well located between a source of contamination and a protected source. This well provides an early warning if constituents of concern start migrating towards it.

consecutive years to ensure that an UR is not defined from a very temporary groundwater condition, but rather the UR represents a persistent undesirable groundwater condition.

3.2.5. Degraded Water Quality

Causes and Effects on Beneficial Users and Uses: UR for degraded water quality is defined as significant and unreasonable degradation of groundwater quality, to the extent of interfering with beneficial uses/users of groundwater used as drinking water, that is caused by EBP Subbasin groundwater extraction. Locally defined significant and unreasonable conditions were determined based on discussions with GSA staff and technical representatives, input received from interested stakeholders and the public through public meetings, through individual stakeholder input to various GSA representatives, and input from DWR.

Minimum Threshold: The MTs for key groundwater quality constituents are 500 mg/L for TDS, 250 mg/L for chloride, 10 mg/L for nitrate as N, and 10 µg /L for arsenic. In the case where the baseline concentration of a key constituent at an RMS well is close to (i.e., within 20%) or already exceeds the MCL, the MT is defined as the baseline groundwater quality (for the applicable constituent(s)) concentration plus 20% for that RMS well.

Criteria: A UR occurs when 25% or more of the RMS wells in the EBP Subbasin exceed the MT for a given key constituent, and this exceedance is a result of overall EBP Subbasin groundwater extraction. The baseline concentration for each key constituent will be set as the average value from baseline sampling events. An exceedance of an MT at a given RMS well is defined based on the average concentration over a three-year monitoring period.

The technical justification for the use of 25% is reasonableness. If a very small percentage of RMS wells (e.g., 10% or less) were used, then a small number of RMS wells exceeding the MT (which may just be a very localized issue) would result in an undesirable result. If a very high percentage of RMS wells (e.g., 75%) were used, then a relatively large portion of the EBP Subbasin is already impacted before an UR occurs. Using a percentage in the 20 to 50% range is a reasonable balance between not letting a very localized problem drive the definition of UR and not allowing most of the EBP Subbasin to be impacted before declaring an UR has occurred. The selection of 25% is at the low end of what is deemed a reasonable range.

Establishing baseline concentrations for key constituents requires multiple sampling events during both the wet (winter/spring) and dry seasons (summer/fall). Additional baseline sampling is needed for key constituents in some RMS wells. In general, baseline concentrations for key constituents will be established based upon a minimum of two wet and two dry season sampling events. The baseline sampling events will occur within the initial five years of GSP implementation, or as soon thereafter for new RMS wells that are constructed and/or added after 2022, to provide the necessary data to establish the range of baseline concentrations for each RMS well key constituent by the Periodic Evaluation. Annual sampling events will be conducted thereafter to compare against baseline concentrations for each key constituent.

If a key constituent concentration increases from less than 50% of the MT to exceed 50% of the MT over two consecutive years, an investigation of the potential causes will be conducted in coordination with the

relevant agencies. If the concentration goes on to exceed 75% of the MT, pumping restrictions may be imposed by the GSA if appropriate. Additionally, the GSAs meet annually with the DTSC and San Francisco Bay Regional Water Quality Control Board to discuss the status of the largest contaminant plumes within the EBP Subbasin and whether pumping may be causing any groundwater quality concerns.

3.2.6. Depletion of Interconnected Surface Water

Causes and Effects on Beneficial Users and Uses: UR for depletion of interconnected surface water is defined as excessive regional groundwater pumping that causes an increase in streamflow depletion rate that results in significant and unreasonable effects to potential beneficial uses/users (e.g., insufficient water for aquatic species, GDEs).

Minimum Threshold: The MT for shallow groundwater levels (as a proxy) is set at two feet below current baseline water levels in the Water Table Aquifer Zone beneath the major creeks. This is considered an interim MT, and the interim MT will be refined with the collection of additional data to improve the understanding of stream-aquifer connectivity and potential for streamflow depletion related to groundwater pumping and after receipt of interconnected Surface Water Guidance from DWR. The proposed MT requires future construction of dedicated shallow monitoring wells along major creeks that will serve as RMS wells. The interim MT are based on model-estimated groundwater levels and are subject to verification when the actual wells are installed and monitored for current baseline water levels.

Criteria: A UR will be defined to occur when 50% or more RMS levels measured in shallow RMS wells near major creeks fall below the MT for two consecutive years (e.g., three out of five wells). This is an initial percentage that is based on very limited data and a small number of planned RMS wells. The technical justification for the selected percentage is reasonableness. If a smaller percentage means 1 or 2 wells have levels that fall below the MT (which may be a very localized issue), then this would be an UR. While the selection of 50% may be at the higher end of what is deemed a reasonable range, this is an initial percentage based on a small number of RMS wells anticipated to be installed to monitor this sustainability indicator (up to 7 wells).

3.3. Minimum Thresholds

(CCR Title 23, Section 354.28)

The regulations define UR as occurring when significant and unreasonable effects are caused by groundwater conditions occurring throughout the Subbasin for a given sustainability indicator. Significant and unreasonable effects occur when MT are exceeded for one or more sustainability indicators. This section describes the following for each sustainability indicator relevant to the EBP Subbasin: the methodology used to set the MT and how selected MT avoid causing UR, relationships to other sustainability indicators, impact on adjacent subbasins, impacts on beneficial uses/users, comparison to relevant federal, state, and local standards, and the measurement method.

This GSP uses the best available data, including the model in some cases, to derive the MT. Development of the MT incorporated input received from GSA staff and technical representatives, interested stakeholders, and the public through public meetings, individual stakeholder input to various GSA

representatives, review of SGMA GSP regulations and DWR best management practices (BMPs), and addresses the conditions of DWR approval for EBP Subbasin in the DWR letter dated July 27, 2023. In addition, meetings were held with DWR staff in 2026 to discuss proposed MT refinements.

The future scenarios with GSP potential future water supply development opportunities are described in detail in Chapter 4 of this GSP and in the groundwater model documentation included in **Appendix 6.E**. The future scenarios include injection (during wet years) and extraction (beginning with the third year of an extended drought) by the EBMUD Bayside Phase 1 Well, and operation of three of Hayward's emergency wells for short durations (two months) under assumed emergency conditions. This future scenario utilizes only the currently existing facilities for Hayward and the assumed replacement of the Bayside Well that was destroyed in 2026. The second scenario includes other potential future water supply development opportunities related to additional groundwater use for large parcel irrigation and San Leandro Creek supplemental flows.

3.3.1. Chronic Lowering of Groundwater Levels

The GSP regulations provide that the “minimum thresholds for chronic lowering of groundwater levels shall be the groundwater level indicating a depletion of supply at a given location that may lead to UR.” Chronic lowering of groundwater levels in the Subbasin would result in significant and unreasonable declines if they are sufficient in magnitude and duration to lower the rate of production of pre-existing groundwater wells below that necessary to meet the minimum required to support overlying beneficial use(s). In addition, groundwater levels will be managed with consideration of the MT to ensure the major aquifers in the Subbasin are not depleted in a manner that causes significant and unreasonable impacts to other sustainability indicators. At the same time, the GSAs recognize that groundwater levels may fall slightly below 2015 levels during the GSP implementation and sustainability periods because groundwater in the EBP Subbasin has been pumped at amounts significantly below the sustainable yield due to limited groundwater pumping since the 1960s. Thus, the MTs have been designated with these considerations in mind.

GDEs were also considered in the setting of MT. The GDEs identified in the subbasin are dominated by terrestrial vegetation, which is susceptible to adverse impacts if groundwater levels in the underlying shallow aquifer experience chronic lowering. The development of the MT for chronic lowering of groundwater levels included a review of the hydrogeologic conceptual model, climate, current and historical groundwater conditions, including groundwater level trends and groundwater quality, seawater intrusion, land subsidence, surface water-groundwater interaction, and the water budget discussed in previous chapters.

The MTs for chronic lowering of groundwater levels are based on the selection of RMS wells from among existing and planned near-term future monitoring wells located throughout the EBP Subbasin and screened in the Shallow, Intermediate, and Deep Aquifer Zones. The selected RMS wells are listed in **Table 3-3** and shown in **Figure 3-1**. Groundwater level hydrographs showing MT for each groundwater level RMS well are provided in **Appendix 3.A**.

The RMS wells described in **Table 3-3** and **Figure 3-1** are in locations that reflect available well locations to best represent groundwater conditions. These locations are representative of the overall Subbasin conditions because they are distributed throughout the EBP Subbasin both vertically (in the Shallow, Intermediate, and Deep Aquifer Zones) and spatially throughout the EBP Subbasin. Additional monitoring wells have been installed to fill data gaps and supplement the distribution of existing RMS wells. The GSAs have determined that the use of the minimum groundwater elevation thresholds at each of the listed RMS wells will help avoid the UR of chronic lowering of groundwater levels by reducing the likelihood that access to adequate water resources for beneficial users within the Subbasin will be compromised.

3.3.1.1. Methodology

The methodology to develop the MT for the chronic decline of groundwater levels involved the following steps:

- 1) Evaluate the DWR Well Completion Report (WCR) database for the location and construction details of wells (as described below).
- 2) Evaluate the location of potential GDEs solely dependent on groundwater levels (as described below).
- 3) Review available existing and likely future RMS wells with regard to several variables/criteria (e.g., GSA ownership and/or access to well, known well construction details, preference for wells with several years of observed water levels, availability of recent water level data, good spatial distribution) and select appropriate RMS.
- 4) For each selected Shallow Aquifer Zone RMS hydrograph, plot a depth of 50 feet below land surface as the initial Shallow Aquifer Zone MT.
- 5) For each selected Shallow Aquifer Zone RMS well hydrograph, review/evaluate the well location relative to potential GDEs. If the RMS well is within the designated GDE area, plot the depth of 7.5 feet below historical observed and/or baseline modeled groundwater elevations.
- 6) The shallowest MT at each Shallow Aquifer Zone RMS well location will serve as the Shallow Aquifer Zone MT for that RMS well.
- 7) For each selected Intermediate and Deep Aquifer Zone RMS hydrograph, plot an elevation of -50 feet MSL as the Intermediate/Deep Aquifer Zone MT.

RMS Well I.D.	Reference Point Elevation (NAVD88)	Well Depth (ft bgs)	Screen Top-Bottom (ft bgs)	Model Layer(s)	Aquifer Designation	MT Depth ¹ (ft bgs)	MT Elevation (ft bgs)	GSA ²
MW-5S	17.676	210	200-210	3-4	Shallow and Intermediate	50	-32	EBMUD
MW-5I	17.676	325	315-325	6	Intermediate	68	-50	EBMUD
MW-5D	17.468	640	500-630	9-12	Deep	67	-50	EBMUD

Table 3-3. Summary of Groundwater Level Minimum Thresholds for RMS								
RMS Well I.D.	Reference Point Elevation (NAVD88)	Well Depth (ft bgs)	Screen Top-Bottom (ft bgs)	Model Layer(s)	Aquifer Designation	MT Depth ¹ (ft bgs)	MT Elevation (ft bgs)	GSA ²
MW-8D	18.427	490	420-480	7-9	Deep	68	-50	EBMUD
MW-9S	58.212	120	110-120	3	Shallow	50	8	EBMUD
MW-9I	58.212	210	200-210	5	Intermediate	108	-50	EBMUD
MW-9D	58.212	335	325-335	6	Intermediate	108	-50	EBMUD
MW-10S	15.636	120	100-120	3	Shallow	50	-34	EBMUD
MW-10I	15.636	360	340-360	7	Intermediate	66	-50	EBMUD
MW-10D	15.636	610	590-610	11	Deep	66	-50	EBMUD
S2-MWS1	15.501	85	50-80	2	Shallow	50	-34	EBMUD
S2-MWS2	15.501	205	140-180	3-4	Shallow	50	-34	EBMUD
S2-MWD1	18.147	555	480-500	7-8	Deep	68	-50	EBMUD
MW-N1I	67.286	220	160-210	6	Intermediate	117	-50	EBMUD
MW-N3S	13.635	95	60-90	2	Shallow	50	-36	EBMUD
MW-S2I	16.92	320	230-310	6	Intermediate	67	-50	Hayward
Well D	52.03	600	500-585	9-11	Deep	102	-50	Hayward
Well E	14.31	525	470-490, 500-525	9-10	Deep	64	-50	Hayward

¹ The actual MT is based on the groundwater elevation, but the depth to water corresponding to the surface elevation in the project database is also provided.

² Each GSA is responsible for collecting groundwater levels for RMS within its GSA area.

DWR WCR Database Evaluation: The DWR WCR database was reviewed to evaluate the locations and construction details of various types of wells, including domestic, irrigation, industrial, and public water supply wells. Domestic wells represent the well type most likely to be impacted by declining groundwater levels, because they tend to be the shallowest. Additional evaluation and recategorization were needed with the DWR well log database, because the primary domestic well use in the EBP Subbasin has been for residential backyard irrigation. Historically, these wells were labeled as either domestic or irrigation wells. Labeling a well for residential parcels as an irrigation well instead of a domestic well can cause confusion with wells used for irrigation at larger non-residential parcels. Thus, domestic and irrigation wells were sorted by well diameter, with wells of 6-inch diameter or less considered to be domestic wells and wells of greater than 6-inch diameter considered to be irrigation wells. Maps were developed to show the general distribution and density of each well type (**Figures 2-2 through 2-5**) and to show minimum domestic well depth by township/range/section for all domestic wells drilled since 1970 and since 1990 (**Appendix 3.A**). These figures, combined with a review of some of the associated WCRs, indicate that a

relatively large number of very shallow residential backyard irrigation wells were installed in the 1970s during the 1976-1977 drought. Many of these wells appear to be hand-dug (using an auger) to depths of 20 to 30 ft bgs with 4-inch PVC casing and well screen and a 10-foot sanitary seal.

A histogram for approximately 230 domestic wells installed since 1970 indicates about 45% of all wells were less than 50 feet deep, and 65% were less than 100 feet deep (**Appendix 3.A**). Such shallow wells in the heavily urbanized EBP Subbasin could only reasonably be used for residential irrigation uses as opposed to drinking water, because the upper 50 to 100 feet of sediments are susceptible to contamination from fuel hydrocarbons, organic solvents, nitrate, and other contaminants. The histogram of 39 domestic wells installed since 1990 shows very few shallow wells (3 less than 50 feet and 10 less than 100 feet deep), suggesting that most of the shallow wells were installed over 30 years ago. It is not known if these very shallow backyard irrigation wells are still active.

Shallow Aquifer Zone MT Rationale: California well standards require a minimum 50-foot well seal for community water systems and municipal water supply wells. Domestic and industrial wells have a 20-foot minimum well seal requirement. With respect to development of drinking water supply wells in the urban EBP Subbasin (including domestic wells that may serve as drinking water supply wells), it is reasonable to assume that drinking water supply wells of any type would have a well seal that is at least 50-feet or greater in depth (likely at least 100 feet deep) to protect the well from potential contaminants originating at ground surface (e.g., fuel hydrocarbons, solvents, nitrate) that are known to impact the upper 100 feet of sediments in the EBP Subbasin. Thus, a conservative assumption is that drinking water supply wells are a minimum of 60 feet deep to allow for a 50-foot well seal and some intake area; it is very likely that drinking water supply wells would need to be considerably deeper than 60 feet to obtain groundwater of suitable quality and to have some protection against the most likely potential contaminants. Based on the assessment of the DWR WCR database described above, the methodology for establishing MT for the shallow (water table) zone chronic lowering of groundwater levels is based in part on an assumed minimum well depth for drinking water supply wells of 60 feet.

GDEs (Shallow Aquifer Zone) MT Rationale: A second major consideration in establishing Water Table Aquifer Zone groundwater level MT is the occurrence of GDEs (aquatic or vegetation) that are either not associated with (located along) streams or are located along streams where GDE health is directly dependent on groundwater levels (i.e., vegetation with certain rooting depths). GDEs that are directly dependent on surface water flows are addressed under the depletion of interconnected surface water criterion. GDEs directly dependent on groundwater levels would not necessarily be protected by an MT that is protective of drinking water supply wells. Therefore, areas of the EBP Subbasin coinciding with known GDEs will have adjustments to the groundwater level MT established to protect drinking water supply wells.

Review of best available data for depth to water across the EBP Subbasin generally indicates depths to water of less than 20 feet in the Water Table Aquifer Zone, although some smaller areas may have depths to water greater than 20 feet. Review of the initial mapping of potential GDE areas (**Appendix 2.A.b**) indicates these potential GDE areas likely have depths to water of about 20 feet or less. Some GDE species are known to have rooting depths of as much as 30 feet; thus, it was considered that shallow water table (i.e., Water Table Aquifer Zone) groundwater level declines of up to 7.5 feet may not have significant effects on the health of

vegetative GDEs in the EBP Subbasin, solely dependent on groundwater levels. Thus, an initial GDE MT adjustment has been established as a decline of 7.5 feet from baseline conditions. The suitability of this initial GDE MT adjustment criterion will be further evaluated in association with the implementation of the biological monitoring program described in **Section 3.5.2.8**.

Intermediate/Deep Aquifer Zone MT Rationale: The Intermediate and Deep Aquifer Zones in EBP Subbasin are confined aquifers that require a separate analysis for setting the groundwater level MT. In general, these aquifers would be comprised of wells that are deeper than 200 feet, and groundwater levels in these aquifers would not directly impact GDEs. Since the depth to the top of well screens in Intermediate to Deep Aquifer Zone wells generally varies from 200 to 500 ft bgs, and typical depths to water in these wells are less than 50 ft bgs, there is generally between 150 and 450 feet of available drawdown in these wells.

Data collected in the Deep Aquifer zone show specific capacities in the range of 5 to 20 gallons per minute per foot of drawdown (gpm/ft). A typical well in this zone might use up to 100 feet of available drawdown to achieve pumping rates in the range of 500 to 2,000 gpm. Best available data for the Intermediate Aquifer Zone (which are more limited) suggest specific capacity values of 0.5 to 8 gpm/ft, which indicates pumping rates of 50 to 800 gpm. These results indicate confined groundwater level drawdowns of 100 to 200 feet are unlikely to significantly decrease the ability of Deep Aquifer Zone wells to obtain adequate well yields, because there would still be significantly more than 100 feet of available drawdown above the top of the well screen. However, a relatively shallow Intermediate Zone well may have a top of well screen depth of 200 ft bgs. Current Intermediate Aquifer Zone groundwater levels are typically within 50 feet of ground surface and at groundwater elevations near or above MSL. Thus, maintaining a static Spring groundwater elevation no lower than -50 feet MSL would allow for 100 feet or more of available drawdown above the shallowest Intermediate well screen and maintain close to current pumping capacities.

Example Hydrographs with MT: Example hydrographs showing MT are provided in **Figures 3-2 through 3-4**. The hydrograph for RMS MW-5D (**Figure 3-4**) and MW-N1I (**Figure 3-3**) demonstrates the MT for the Deep and Intermediate Aquifer Zones, respectively. Recent observed data were available for comparison for MW-5D, but very limited observed data are available for MW-N1I, which was just recently installed in 2025. An example hydrograph illustrating MT for the Shallow Aquifer Zone is provided in **Figure 3-2**. This site (MW-N3S) was also recently installed in 2025. Hydrographs illustrating MT for all RMS wells are provided in **Appendix 3.A**.

3.3.1.2. Relationship to Other Sustainability Indicators

The relationships between groundwater level MT and other sustainability indicators are described below.

- **Reduction of Groundwater Storage.** The MT for the reduction of groundwater storage is based on the sustainable yield of the EBP Subbasin. Pumping at or less than the sustainable yield will avoid long-term and ongoing reduction of both groundwater storage and groundwater elevations in the Subbasin. Therefore, the groundwater level MTs are consistent with the MT for the reduction of groundwater storage that is based on pumping within the sustainable yield.

- **Seawater Intrusion.** The seawater intrusion MT is based on chloride concentrations. The seawater intrusion MTs have been designed to detect changes in chloride concentrations within sentinel monitoring wells. The MTs for groundwater levels are designed to prevent chronic decline in groundwater levels, which is consistent with the MT for preventing seawater intrusion.
- **Land Subsidence.** The land subsidence MT metric is defined as the measured vertical displacement of the land surface based on InSAR data. The MT for groundwater levels is designed to prevent chronic decline in groundwater levels, which is consistent with the MTs for preventing land subsidence.
- **Degraded Water Quality.** The groundwater quality MTs are based on the MCLs for key constituents. GSP potential future water supply development opportunities include groundwater extraction and injection projects that will cause some temporary fluctuations in groundwater levels. The groundwater level MTs for preventing chronic decline in groundwater levels are consistent with groundwater quality MT to minimize increases in key constituents. Overall, it is anticipated that there will likely be an overall net benefit to groundwater quality from GSP injection projects due to the injection of high-quality surface water and the fact that injection would serve to reduce the potential for groundwater level declines. It is possible (although unlikely) that groundwater extraction projects from the Intermediate and Deep Aquifer Zones could draw shallow groundwater vertically downward in some areas where poorer water quality may be present in the shallow zone. There will be an ongoing review of the extraction well and the nearby monitoring well water quality related to GSA water supply development opportunities to evaluate the need for adaptive management, as necessary.
- **Depletion of Interconnected Surface Water.** The MT for depletion of interconnected surface water are based on groundwater model results for location, timing, and amount of depletions of interconnected surface water. The potential for impacts related to the depletion of interconnected surface water is a function of potential changes in shallow groundwater levels from the implementation of GSA potential future water supply development opportunities. Most of these projects involve pumping from Intermediate and Deep Aquifer Zones, which are separated from shallow groundwater by significant thicknesses of clay layers that serve to impede vertical migration of groundwater. However, the potential for groundwater pumping from deeper zones to impact shallow groundwater levels is accounted for in establishing SMC for stream depletion.

3.3.1.3. Impact of Selected Minimum Thresholds on Adjacent Basins

The groundwater level MTs established for the EBP Subbasin do not provide a good indication of anticipated impacts on adjacent subbasins from implementation of the GSP. This is because the GSAs' operational plans for future groundwater pumping represent a temporary groundwater level condition (drawdowns are expected to recover within a few months) since the planned pumping occurs only during short time frames. Ultimately, the potential for impacts on adjacent subbasins will be primarily a function of average water levels in EBP Subbasin. Therefore, the impact on adjacent subbasins is better described based on MO. Nonetheless, an evaluation of temporary low groundwater elevations in the EBP Subbasin and potential impacts on the sustainability of the Niles Cone Subbasin was conducted and is described below.

The Niles Cone Subbasin is being managed under SGMA with an Alternative (to a GSP) Plan, herein referred to as the Alternative or Niles Cone Alternative, that has been approved by DWR. The Hayward Fault portion of the Niles Cone Subbasin is the only area that would be potentially impacted by the implementation of the EBP Subbasin GSP. Below the Hayward Fault portion of Niles Cone is separated from the southern EBP Subbasin by a transition zone described in detail in Chapter 2 of this GSP. In the transition zone area (see **Figure 3-5** for location), there are stratigraphic offsets² of coarse-grained aquifer units that create a partial barrier that impedes horizontal groundwater flow through the transition zone. The presence and level of impedance through the transition zone is documented through a combination of geologic (e.g., stratigraphy and depositional environments), hydraulic (i.e., regional aquifer testing), and hydrochemical (i.e., isotope) data (**Appendix 2.A.B**). The EBP Subbasin Groundwater Model is calibrated to the available transition zone data (**Appendix 6.E**).

The Niles Cone Alternative measures sustainability by maintaining Shallow Aquifer Zone (Newark Aquifer) groundwater levels above sea level, and it allows for short-term declines below sea level during droughts (although the allowable duration of declines below sea level during droughts is not specified). A single sustainability indicator well (4S/1W-29A6) was selected to monitor sustainability in the Niles Cone Subbasin (see **Figure 3-5** for the location of the well). Management of the Niles Cone Subbasin under the Alternative is based on maintaining shallow Newark Aquifer groundwater elevations above mean sea level to prevent seawater intrusion, and the Alternative states that this management approach also addresses the other sustainability criteria. The EBP GSP model scenario run for potential future water supply development opportunities included inserting an observation point at the 4S/1W-29A6 location to measure estimated impacts (i.e., drawdown) from implementation of EBP Subbasin potential future water supply development opportunities. In addition, contour maps of drawdown were developed that extend into the Niles Cone Subbasin. Additional evaluation of potential impacts on the Niles Cone Subbasin is provided in **Appendix 6.E**.

Review of model-predicted impacts on the Niles Cone Subbasin from implementation of proposed potential future water supply development opportunities in EBP Subbasin indicates that impacts to the Shallow Aquifer in the Niles Cone Subbasin are expected to be less than 0.5 feet during years with GSA project extraction (and even less in other years). Based on how sustainability is defined for the Niles Cone Subbasin in the DWR-approved Niles Cone Alternative, the implementation of EBP Subbasin's potential future water supply development opportunities outlined in the GSP will not impede the ability of Alameda County Water District (ACWD) to maintain sustainability in the Niles Cone Subbasin. If GSAs in the EBP Subbasin implement additional projects to increase net extraction, additional evaluation of potential impacts to neighboring subbasins will be conducted at that time.

3.3.1.4. Minimum Threshold Impacts on Beneficial Uses and Users

Groundwater level MT may have effects on beneficial uses, users, land use, and property owners. Those that may be impacted include other municipal users, industrial and irrigation water users, domestic water users, and ecological land uses and users. Other municipal, industrial, and irrigation water users may be

² The stratigraphic effects are most likely related to different depositional environments and not due to faulting.

impacted by temporary increases in pumping lifts/costs to pump groundwater, although benefits will be derived at other times with higher groundwater levels related to potential future well injection. Domestic well owners/users generally use small amounts of groundwater from the Shallow and possibly the Intermediate Aquifer Zones. It is possible for the very shallow domestic irrigation wells, if they are still active, to experience temporary conditions of limited well saturation during droughts. In addition, there may be temporary increases in pumping lifts/costs to pump groundwater for domestic well owners/users, although impacts to the Shallow Aquifer Zone groundwater levels will be substantially less than in Intermediate/Deep Aquifer Zones.

Ecological impacts are possible in the potential GDE Units identified in the Subbasin. The potential GDE units are composed of vegetation, which may access shallow groundwater within approximately 30 feet of the surface. Modeled shallow water levels do not fluctuate very much in response to proposed groundwater pumping due to most pumping being derived from the Intermediate and Deep Aquifer Zones that are separated from the shallow Water Table Zone by multiple clay layers. If a 6-year drought and projected water level declines to MT levels were to occur, effects on potential GDEs could include short-term adverse impacts such as water stress and possibly longer-term impacts such as reduced growth and recruitment. Given the relatively low projected frequency and short duration of the shallow groundwater level declines, coupled with the inherent uncertainty in model projections and apparent resiliency of the potential GDEs to historical drought periods and times of pumping more than the sustainable yield, significant adverse impacts due to groundwater pumping are unlikely. Overall, sustainable groundwater management in the EBP Subbasin is expected to maintain the health and resiliency of the vegetation communities composing the potential GDE Units despite some potential temporary future impacts that may occur if the MTs for groundwater levels are reached.

3.3.1.5. Comparison of Minimum Thresholds and Relevant State, Federal, or Local Standards

There are no Federal, State, or local standards that exist for chronic lowering of groundwater levels.

3.3.1.6. Minimum Thresholds Measurement Method

Groundwater levels for comparison to MT will be directly measured for existing and new monitoring wells. The groundwater level monitoring will be conducted in accordance with the monitoring plan and protocols outlined in Section 3.5. Furthermore, the groundwater level monitoring will meet the requirements of the technical and reporting standards included in the SGMA regulations. As noted in Section 3.5, the current groundwater level RMS monitoring network includes 6 wells in the Shallow Aquifer Zone, 6 wells in the Intermediate Aquifer Zone, and 6 wells in the Deep Aquifer Zone.

3.3.2. Reduction of Groundwater Storage

The GSP regulations state that the “...minimum threshold for reduction of groundwater storage shall be a total volume of groundwater that can be withdrawn from the basin without causing conditions that may lead to UR. Minimum thresholds for reduction of groundwater storage shall be supported by the sustainable yield...and projected water use in the basin.” EBP Subbasin groundwater conditions that

involve excessive regional groundwater pumping would result in a significant and unreasonable reduction of groundwater storage. Locally defined significant and unreasonable conditions were determined based on discussions with GSA staff and technical representatives, input received from interested stakeholders and the public through public meetings, and through individual stakeholder input to various GSA representatives. Significant and unreasonable reduction of groundwater storage occurs when there is a long-term reduction of groundwater storage during the sustainability period (i.e., after 2042). The MT for reduction of groundwater storage is an annual pumping volume no greater than 12,500 AFY (based on estimated sustainable yield) measured as a five-year moving average.

In evaluating this sustainable management criterion, it is noteworthy that groundwater storage as of the January 2015 SGMA benchmark reflects a groundwater basin that was experiencing substantially less groundwater pumping compared to its estimated sustainable yield. Thus, implementation of GSA potential future water supply development opportunities would be expected to result in some decline in groundwater storage from the 2015 SGMA baseline. However, the evaluation is based on a significant and unreasonable reduction of groundwater storage, which would be a reduction of storage beyond what would be expected with reasonable (i.e., within sustainable yield) additional development of groundwater supplies in the EBP Subbasin.

3.3.2.1. Methodology

The selected methodology of annual groundwater pumping volumes involves developing a five-year moving average of annual groundwater pumping, which is to be maintained below the MT of 12,500 AFY (**Figure 3-6**). The five-year duration for the moving average is selected as a reasonable time frame, compared to a shorter or longer time frame. A shorter period, such as one to two years, does not account for the potential need for short-term greater pumping that may occur due to very extreme water shortages related to natural disasters (e.g., earthquakes) and/or extreme drought conditions. However, a longer time frame for a moving average (e.g., 8 or 10 years) is excessive and unreasonable as a duration for extreme reliance on groundwater pumping for such conditions. The use of a five-year moving average provides a good balance between accounting for short-term extreme needs, while not allowing for long-term overpumping of the subbasin. In addition, the best available data indicates the EBP Subbasin was historically pumped at levels exceeding the current initial GSP sustainable yield estimate for more than five years. Thus, the selected MT based on the five-year moving average has been exceeded in the historical record without major reported consequences, such as UR (i.e., the MT duration represents a conservative/low value).

As described in Chapter 2 of this GSP, there is estimated to be in excess of approximately two million acre-feet of groundwater storage in the EBP Subbasin. However, the usable storage is likely limited by maintaining a relatively full basin to prevent seawater intrusion, particularly in the Shallow Aquifer Zone. Derivation of the initial sustainable yield estimate included major constraints on pumping to ensure seawater intrusion does not occur. Therefore, pumping no more than an estimated sustainable yield that accounts for the prevention of seawater intrusion is expected to maintain sufficient groundwater in storage.

One challenge in implementing this MT is the general lack of direct measurements of groundwater pumping in the EBP Subbasin (except for EBMUD and Hayward municipal wells). Most wells (except for municipal wells) are not metered, and indirect methods like estimating consumptive use would be primarily applicable to large, irrigated parcels known to be irrigated by groundwater. While the total water demand for residential irrigation has been (and can be) estimated, there is significant uncertainty in the total amount that may be supplied by groundwater. A portion of industrial water use is also supplied by groundwater, but industrial wells are not metered, and not all industrial well locations are known. The GSAs will be working to reduce uncertainty in groundwater pumping estimates in the future.

3.3.2.2. Relationship to Other Sustainability Indicators

The relationships between groundwater storage MT and other sustainability indicators are described below.

1. **Chronic Lowering of Groundwater Levels.** Because the groundwater storage MT is based on the estimated sustainable yield and the sustainable yield is based in part on maintaining groundwater levels and groundwater outflow, it is expected that the reduction of groundwater storage MT will not cause UR for this sustainability indicator.
2. **Seawater Intrusion.** Because the groundwater storage MT is based on the estimated sustainable yield and the sustainable yield is based in part on preventing seawater intrusion, it is expected that the reduction of groundwater storage MT will not cause UR for this sustainability indicator.
3. **Land Subsidence.** Because future groundwater levels in the Intermediate/Deep Zone Aquifers will be associated with groundwater pumping volumes no greater than 12,500 AFY, and historical pumping volumes in the 1950s and early 1960s were likely on the order of double the sustainable yield volume (see **Appendix 6.E**), it is expected that no subsidence will occur due to the reduction of groundwater storage MT because historical groundwater levels were lower than would occur at pumping volumes less than 12,500 AFY.
4. **Degraded Water Quality.** The MT pumping volume of 12,500 AFY for the reduction of groundwater storage will not directly lead to a degradation of groundwater quality. Historical pumping volumes far greater than the reduction of groundwater storage MT have occurred, and apparently did not result in any reported groundwater quality impacts, with the possible exception of local areas of elevated chloride/TDS in the Shallow Aquifer Zone along the Bay margin that are more related to the seawater intrusion sustainability indicator.
5. **Depletion of Interconnected Surface Water.** The potential for impacts related to the depletion of interconnected surface water for the reduction of groundwater storage MT is a function of potential changes in shallow groundwater storage from the implementation of GSA potential future water supply development opportunities. Most of these projects restrict pumping to the Deep or Intermediate/Deep Aquifer Zones, which are separated from Shallow Zone water levels by significant thicknesses of clay layers that serve to impede vertical migration of groundwater. Therefore, the reduction of groundwater storage MT is not expected to significantly influence the depletion of interconnected surface waters.

3.3.2.3. Impact of Selected Minimum Thresholds on Adjacent Basins

An MT for the reduction of groundwater storage tied to EBP Subbasin sustainable yield over extended periods with average climatic conditions during the Sustainability Period should be protective of adjacent subbasins. Additional characterization of the potential interconnection between the EBP Subbasin and the Niles Cone Subbasin is planned in the near future. The results of that study and data collected from new wells in the southern part of the EBP Subbasin will be used to assess and potentially refine the MT of 12,500 AFY for the reduction of groundwater storage. In addition, current plans for GSA groundwater development involve pumping no more than approximately 35% of the estimated sustainable yield. Future groundwater supply development to a greater proportion of sustainable yield would involve additional data collection, analyses, and further evaluation of adjacent basin impacts.

3.3.2.4. Minimum Thresholds Impact on Beneficial Uses and Users

The MT of 12,500 AFY of groundwater pumping allows for some small initial decline in groundwater elevations with implementation of potential future water supply development opportunities, resulting in increased net groundwater pumping (while remaining within the EBP Subbasin sustainable yield), followed by maintaining stable average groundwater elevations during the Sustainability Period. The overall initial reduction of groundwater storage is not expected to significantly impact beneficial uses and users of groundwater in the Subbasin. However, it is possible for localized pumping by GSAs or other third parties to impact other beneficial uses (e.g., environmental users, irrigation uses). Such impacts to other potential beneficial users are expected to be addressed through monitoring and adaptive management, as necessary.

3.3.2.5. Comparison Between Minimum Thresholds and Relevant State, Federal, or Local Standards

There are no Federal, State, or local standards that exist for the reduction of groundwater storage.

3.3.2.6. Minimum Thresholds Measurement Method

The minimum thresholds for groundwater storage reduction are based on various methods of measuring or estimating groundwater pumping, such as meters, remote sensing, the use of crop coefficients, and personal communication with well owners. Additional discussion of quantifying groundwater pumping is provided in Section 3.5.

3.3.3. Seawater Intrusion

The GSP regulations require the use of chloride isocontours for the seawater intrusion MT. However, analysis of chloride data available for the EBP Subbasin highlighted low concentrations of chloride in the majority of the Subbasin and stable concentrations over time. Historical and recent EBP Subbasin monitoring data show no evidence of seawater intrusion. Aside from some shallow wells near the San Francisco Bay, the majority of wells within the Subbasin have chloride concentrations that consistently fall below 200 mg/L (**Appendix 3.C1**). Thus, through consultations with DWR, a sentinel well approach was developed to monitor

seawater intrusion. These sentinel wells will be sampled for chloride concentrations, and the measurements will be compared to the established MT. Seawater intrusion in the Subbasin would become significant and unreasonable if excessive regional groundwater pumping causes migration of saline Bay water into existing freshwater aquifers that are or could be developed for water supply, to the extent that increased groundwater salinity precludes beneficial use of groundwater for drinking water supply. This migration would be detected through the monitoring of the sentinel wells.

The MT for seawater intrusion is set at 500 mg/L. However, if the baseline concentration at a sentinel well already exceeds this MT or is within 20% of the MT, the MT at that well will be set at the baseline concentration plus 20%. The 20% margin above baseline is based on an evaluation of the following potential sources of concentration fluctuations: analytical lab methods, sampling methods, and variability in the groundwater system as described in Section 3.3.5.1. The selected sentinel RMS wells are listed in **Table 3-4** and shown on **Figures 3-7**. Chloride chemographs showing the MT for each seawater intrusion sentinel RMS well are provided in **Appendix 3.C2**.

The sentinel RMS wells described in **Table 3-4** and **Figures 3-7** are in locations that reflect available well locations to best represent groundwater conditions. These locations are representative of the areas of the Subbasin that are most susceptible to seawater intrusion, and they are distributed throughout the Subbasin vertically (in the Shallow, Intermediate, and Deep Aquifer Zones).

Well I.D.	Reference Point Elevation (NAVD88)	Well Depth (ft bgs)	Screen Top-Bottom (ft bgs)	Aquifer Designation	MT ^{3,4} (mg/L)	MT (above baseline) ³ (mg/L)	GSA ³
MW-5C (Port of Oakland)	TBD	185	160-180	Shallow	TBD	TBD	EBMUD
MW-5D	17.468	640	500-630	Deep	500	NA	EBMUD
USGS_374004 122092105	TBD	138	TBD	Shallow	TBD	TBD	EBMUD
USGS_374004 122092104	TBD	318	TBD	Intermediate	TBD	TBD	EBMUD
MW-3C (Port of Oakland)	TBD	210	185-205	Intermediate	TBD	TBD	EBMUD
MW-10S	15.636	120	100-120	Shallow	500	NA	EBMUD
MW-10I	15.636	360	340-360	Intermediate	500	NA	EBMUD
MW-10D	15.636	610	590-610	Deep	500	NA	EBMUD
S2-MWS2	15.501	205	140-180	Shallow	TBD	TBD	EBMUD
S2-MWD1	18.147	555	480-500	Deep	500	NA	EBMUD
MW-N3S	13.635	95	60-90	Shallow	TBD	TBD	EBMUD

Table 3-4. Summary of Seawater Intrusion Minimum Thresholds for RMS							
Well I.D.	Reference Point Elevation (NAVD88)	Well Depth (ft bgs)	Screen Top-Bottom (ft bgs)	Aquifer Designation	MT ^{3,4} (mg/L)	MT (above baseline) ³ (mg/L)	GSA ³
MW-B-Shallow	TBD	232	172-182; 212-222	Shallow	TBD	TBD	Hayward
MW-B-Intermediate	TBD	382	302-312; 362-372	Intermediate	TBD	TBD	Hayward
Well E	14.31	535	470-525	Deep	TBD	TBD	Hayward

¹ This MT applies to sentinel wells where the baseline concentration is below 500 mg/L.

² Where TBD is listed, enough data was not available to calculate a baseline concentration. When enough data is available, MT will be established. The minimum baseline sampling required to establish MT is two wet-season and two dry-season sampling events.

³ This MT applies to sentinel wells where the baseline concentration is above 500 mg/L.

⁴ Each GSA is responsible for collecting groundwater levels for RMS within its GSA area.

3.3.3.1. Methodology

The selected methodology of using chloride concentrations in sentinel wells involves the analysis of existing chloride data in the sentinel well network. Sentinel wells are located in all three aquifer zones (shallow, intermediate, and deep). Sampling of sentinel wells for chloride in the future is also required to allow for comparison of the future chloride concentrations to the established MT. A key benefit of this approach is that it is the simplest and most direct approach using available wells to evaluate seawater intrusion conditions. The maximum secondary MCL value for chloride is 500 mg/L. At this concentration, the advancement of the saline front can be clearly identified. Compared to the current concentration of 200 mg/L or less in the majority of the sentinel wells, the MT of 500 mg/L would represent a meaningful change in the chloride concentration.

In the case where a well's historical concentration already exceeds 500 mg/L or the chloride concentration is within 20% of 500 mg/L, the baseline concentration of that well plus 20% will be utilized as the MT. The baseline concentration was (or will be) established through an analysis of data collected at the sentinel wells. Multiple sampling events during wet (winter/spring) and dry (summer/fall) seasons are necessary for establishing baseline concentrations. At a minimum, two wet-season and two dry-season samples were (or will be) utilized to establish baseline concentrations. Due to this data requirement, baseline concentrations for some wells have not yet been calculated. The technical justification for selecting 20% comes from the evaluation of the different sources of fluctuations in chloride measurements. These sources include analytical lab methods, sampling methods, and variability within the groundwater system. Baseline concentration plus 20% accounts for some of the potential measurement variability resulting from these three factors. This is discussed further in Section 3.3.5.1.

Available data for the sentinel wells were analyzed based on the aquifer zone. The chemographs resulting from this analysis are included in **Appendix 3.C2**. This data informed the MT values established for the sentinel wells. The MT for RMS (sentinel) wells for seawater intrusion are summarized in **Table 3-4**. The distribution of these wells across the Subbasin is displayed in **Figures 3-7**.

The wells were selected based on their proximity to the western edge of the EBP Subbasin. These wells are positioned to detect seawater intrusion before the saline front makes its way inland. The shallow aquifer zone is the most susceptible to seawater intrusion and therefore contains the most extensive sentinel well network. Sentinel wells for the intermediate and deep zones are concentrated in the southern half of the EBP Subbasin, where these aquifer zones occur. Furthermore, these two aquifer zones are where the majority of the pumping currently occurs and/or is most likely to occur in the future, thus making it the most likely location for seawater intrusion resulting from pumping.

3.3.3.2. Relationship to Other Sustainability Indicators

The seawater intrusion MTs are based on limiting increases in chloride concentrations in sentinel wells to prevent seawater intrusion. The relationships of seawater intrusion MT to other sustainability indicators are described below.

1. **Chronic Lowering of Groundwater Levels.** The MTs for groundwater levels are designed to prevent chronic decline of groundwater levels, which is consistent with MTs for preventing seawater intrusion.
2. **Reduction of Groundwater Storage.** The MT for the groundwater storage area is designed to prevent a decline in groundwater storage, which is consistent with MTs for preventing seawater intrusion.
3. **Land Subsidence.** The MTs for land subsidence are designed to prevent the occurrence of land subsidence, both of which are dependent on avoiding chronic decline in groundwater levels.. Therefore, the MT for land subsidence is consistent with the MT for preventing seawater intrusion.
4. **Degraded Water Quality.** The MT for degraded groundwater quality and seawater intrusion are very closely related since both are based on changes in constituent concentrations and MCLs. The MT methodologies and rationales are consistent between seawater intrusion and groundwater quality and will not interfere with each other.
5. **Depletion of Interconnected Surface Water.** The seawater intrusion MT was established independently from the MT for the depletion of interconnected surface water. The depletion of interconnected surface waters MTs are based on the location, timing, and amount of depletions of interconnected surface water. Both sets of MT are based on different metrics and, thus, are not dependent on one another and are not expected to interfere with each other.

3.3.3.3. Impact of Selected Minimum Thresholds on Adjacent Basins

An MT that does not allow for seawater intrusion during the sustainability period will not have negative impacts on adjacent basins and will be protective of adjacent subbasins. The EBP GSP seawater intrusion

MT will be protective of the Niles Cone Subbasin and should minimize any potential for adjacent basin impacts related to this key sustainability criterion.

3.3.3.4. Minimum Thresholds Impact on Beneficial Uses and Users

The seawater intrusion MT of 500 mg/L chloride concentration or baseline plus 20% is not expected to significantly impact beneficial uses and users of groundwater in the Subbasin.

3.3.3.5. Comparison Between Minimum Thresholds and Relevant State, Federal, or Local Standards

There are no Federal, State, or local standards for the prevention of seawater intrusion; however, a chloride concentration of 500 mg/L is commonly used in other groundwater basins to define seawater intrusion. This standard used in other basins is consistent with an MT of 500 mg/L.

3.3.3.6. Minimum Thresholds Measurement Method

The MTs for seawater intrusion are based on chloride concentrations being measured in shallow, intermediate, and deep aquifer zone sentinel wells.

3.3.4. Land Subsidence

The GSP regulations require the use of a rate and extent of subsidence that “substantially interferes with surface land uses...” for use as the MT. Land subsidence in the Subbasin would become significant and unreasonable if excessive regional groundwater pumping causes significant and unreasonable damage on a regional scale to public infrastructure critical for public health and safety (i.e., levees, flood control channels, water supply aqueducts). Locally defined significant and unreasonable conditions were determined based on discussions with GSA staff and technical representatives, input received from interested stakeholders and the public through public meetings, through individual stakeholder input to various GSA representatives, and through meetings with DWR.

The MT for land subsidence is set to maintain current conditions of no long-term subsidence, and is set at 0.1 foot of annual subsidence. An UR for land subsidence is deemed to occur when 25% or more of RMS sites exceed the MT for two consecutive years.

3.3.4.1. Methodology

The methodology to develop the MT for land subsidence is based on a review of historical land subsidence data for the EBP Subbasin. InSAR satellite data, provided by DWR, is available since 2015 in the subbasin and shows no measurable subsidence over this time period (**Appendix 3.D**). Therefore, the MT was selected to maintain the current conditions of no long-term subsidence and to prevent undesirable results from occurring.

The land subsidence MT is set at an annual rate of 0.1 feet per year. This threshold takes into account the level of uncertainty associated with the InSAR satellite dataset. The InSAR dataset has a reported vertical

accuracy of 21 mm or 0.07 feet (Towill, Inc., 2026), which has been rounded up to 0.1 feet for the MT. This is not meant to allow for a continued rate of 0.1 feet/year of subsidence in the EBP Subbasin. Rather, this is an acknowledgment that there may be instances where measurement uncertainty will indicate a rate of subsidence that is within the noise of the data and is equivalent to no subsidence in the EBP Subbasin. The definition of undesirable results (as described in Section 3.2.4) will govern, and exceedances of the undesirable result will trigger further management actions within the EBP Subbasin.

The RMS sites for land subsidence are consistent with the groundwater level RMS network (**Figure 3-8**). InSAR data will be extracted and evaluated at each point location. These locations are representative of the overall EBP Subbasin conditions because they are spatially distributed throughout the EBP Subbasin.

3.3.4.2. Relationship to Other Sustainability Indicators

The relationships of land subsidence MT to other sustainability indicators are described below.

1. **Chronic Lowering of Groundwater Levels.** A chronic decline in groundwater levels is one of the factors that can lead to the occurrence of subsidence in a groundwater basin. However, the land subsidence MT of no long-term subsidence is consistent with the groundwater level MT to avoid a chronic decline in groundwater levels.
2. **Reduction of Groundwater Storage.** The reduction of groundwater storage MT is based on pumping volumes, whereas the land subsidence MT is based on measurement of changes in land surface elevation using InSAR data. The reduction of groundwater storage MT is based on a sustainable yield estimate of 12,500 AFY, and historical groundwater elevation lows were generally associated with much higher pumping volumes. These historical higher pumping volumes beyond 12,500 AFY are not known to have caused any significant amount of subsidence. Thus, the limitation imposed on future maximum pumping volumes by the groundwater storage MT is to be consistent with the MT established for subsidence.
3. **Seawater Intrusion.** The seawater intrusion MT is based on chloride concentrations, whereas the land subsidence MT is based on the measurement of changes in land surface elevation using InSAR data. Therefore, land subsidence MTs are not expected to conflict with seawater intrusion MT.
4. **Degraded Water Quality.** The land subsidence MTs are not expected to result in a significant or unreasonable change in groundwater quality.
5. **Depletion of Interconnected Surface Water.** The depletion of interconnected surface water MT is based on location, timing, and amount of depletion of interconnected surface water, whereas the land subsidence MT is based on measurement of changes in land surface elevation using InSAR data. Therefore, land subsidence MTs are not expected to conflict with the depletion of interconnected surface water MT.

3.3.4.3. Impact of Selected Minimum Thresholds on Adjacent Basins

The MT established for land subsidence is set to maintain current conditions of no long-term subsidence and will not impact adjacent basins, as there are currently no impacts to adjacent basins related to this sustainability indicator.

3.3.4.4. Minimum Thresholds Impact on Beneficial Uses and Users

The MT for land subsidence is not expected to have any impacts on beneficial uses and users within the EBP Subbasin. Available historical data indicates essentially no subsidence in the EBP Subbasin, and the MT is consistent with maintaining these conditions. As no impacts to beneficial uses and users have been reported historically, maintenance of current conditions within the subbasin should have no future impacts on these uses and users.

3.3.4.5. Comparison Between Minimum Thresholds and Relevant State, Federal, or Local Standards

There are no Federal, State, or local standards that exist for land subsidence.

3.3.4.6. Minimum Thresholds Measurement Method

The MT for land subsidence will be evaluated using the InSAR satellite data that is provided by DWR. The annual rate MT will be evaluated based on the October 1 measurement. The RMS sites for land subsidence are consistent with the groundwater level RMS network.

3.3.5. Degraded Water Quality

The GSP regulations state that the “...minimum thresholds for degraded water quality shall be the degradation of water quality, including the migration of contaminant plumes that impair water supplies...” Degraded water quality in the Subbasin would become significant and unreasonable if Subbasin groundwater extraction causes degradation in water quality. Locally defined significant and unreasonable conditions were determined based on discussions with GSA staff and technical representatives, input received from interested stakeholders and the public through public meetings, and through individual stakeholder input to various GSA representatives.

The MTs for degraded water quality are based on the greater of MCLs for key constituents or the baseline concentration plus 20%. The MCLs are 10 mg/L for nitrate as N; 10 µg /L for arsenic; 250 mg/L for chloride, and 500 mg/L for TDS. If the baseline concentration already exceeds the MCL or is within 20% of the MCL, the MT is set at 20% higher than the baseline. An MT exceedance for a given constituent at a given RMS well occurs when the average concentration over a 3-year period exceeds the MT. URs occur when the MTs of a key constituent are exceeded at 25% or more of the RMS wells in the EBP Subbasin. A 3-year average is used to help ensure that a one-time concentration fluctuation does not automatically cause an MT exceedance, and allows for confirmation sampling to be conducted in subsequent sampling rounds to confirm that an MT exceedance has occurred. Groundwater quality MTs were not established for

contaminant plumes because water supply pumping impacts (primarily from Intermediate and Deep Zones) were deemed very unlikely to impact contaminant plumes that would tend to occur in the upper portion of the Shallow Zone. However, potential impacts to contaminant plumes will be evaluated on a GSA project-specific basis.

In addition to setting MT for degraded water quality, Action Levels were established at 50% and 75% of the MT for key constituents with primary MCLs (i.e., nitrate and arsenic) at RMS wells where the baseline concentration is well below the MT. The purpose of setting these Action Levels is to require certain GSA actions. If a baseline concentration increases above the 50% Action Level, the cause of key constituent concentration increases will be evaluated, along with whether or not the cause is tied to GSA potential future water supply development opportunities. If the 75% Action Level is subsequently exceeded, the GSA will take action to avoid an MT exceedance (if an increase in concentrations is determined to be caused by GSA potential future water supply development opportunities) or report results to the appropriate agencies (if not caused by GSA potential future water supply development opportunities). Action levels were not set for key constituents with secondary MCLs (i.e., TDS and chloride) because: 1) unlike primary MCLs, secondary MCLs are aesthetic-based and not health-based standards; and 2) the MT for constituents with secondary MCLs are already based on the lowest (recommended) secondary MCL (e.g., the recommended secondary MCL for chloride is 250 mg/L, whereas the maximum secondary MCL for chloride is 500 mg/L).

The MTs for degraded water quality apply to RMS wells selected from among existing wells located throughout the Subbasin and screened in the Shallow, Intermediate, and Deep Aquifers. The RMS wells for groundwater quality include monitoring wells to be sampled and analyzed by the Subbasin GSAs. The selected RMS wells for groundwater quality are listed in **Table 3-5**, and locations are shown on **Figure 3-9**. An example groundwater quality RMS well time series for the selection of SMC is provided in **Figure 3-10**.

Well ID	Well Depth (ft, bgs)	Screen Top-Bottom (ft, bgs)	Aquifer Designation	MT Arsenic Concentration (µg/L)	MT Nitrate Concentration (mg/L)	MT Chloride Concentration (mg/L)	MT TDS Concentration (mg/L)
MW-5S	210	200-210	Shallow and Intermediate	10	10	250	547 ²
MW-5I	325	315-325	Intermediate	12 ²	10	250	540 ²
MW-5D	640	500-630	Deep	10	10	250	554 ²
MW-9S	120	110-120	Shallow	10	11 ²	250	748 ²
MW-9I	210	200-210	Intermediate	10	10	250	509 ²
MW-9D	335	325-335	Intermediate	10	10	250	540 ²
MW-10S	120	100-120	Shallow	10 ¹	10	250	500
MW-10I	360	340-360	Intermediate	10	10	250	545 ²

Table 3-5. Summary of Groundwater Quality Minimum Thresholds for RMS Wells							
Well ID	Well Depth (ft, bgs)	Screen Top-Bottom (ft, bgs)	Aquifer Designation	MT Arsenic Concentration (µg/L)	MT Nitrate Concentration (mg/L)	MT Chloride Concentration (mg/L)	MT TDS Concentration (mg/L)
MW-10D	610	590-610	Deep	10	10	250	610 ²
S2-MWS1	85	50-80	Shallow	41 ²	10	20,400 ²	42,800 ²
S2-MWS2	205	140-180	Shallow	10	10	4,200 ²	7,320 ²
S2-MWD1	555	480-500	Deep	36 ²	10	250	777 ²
MW-N1I	220	160-210	Intermediate	10	10	250	500
MW-N3S	95	60-90	Shallow	10	10	250	500
MW-S2I	320	230-310	Intermediate	10	10	250	500
Well D	600	500-585	Deep	10	10	250	500 ¹
Well E ¹	525	470-490; 500-525	Deep	10	10	250	500

¹ Values will be confirmed and/or adjusted as needed based on results from initial sampling for constituents.

² MT greater than MCLs are due to baseline concentrations being greater than 80% of the MCL.

3.3.5.1. Methodology

The methodology to develop MT for groundwater quality is based on the objective of protecting beneficial uses from significant and unreasonable adverse impacts from SGMA-related groundwater management activities and implementation of GSP potential future water supply development opportunities. In accordance with the Basin Plan (California Regional Water Quality Control Board, San Francisco Bay Region, 2019), groundwater in the Subbasin is considered suitable or potentially suitable for municipal and domestic water supply (MUN), agricultural supply (AGR), industrial service supply (IND), and industrial process supply (PRO) beneficial uses. From a groundwater quality standpoint, the municipal and domestic supply beneficial use is the most restrictive, with Basin Plan water quality objectives linked to drinking water MCLs. As a result, the MTs for groundwater quality set for each of the four identified key water quality constituents (nitrate, arsenic, chloride, TDS) are the respective MCL values, except for cases where existing or historical concentrations for these constituents already exceed the MCL. When baseline concentrations for the key constituents exceed 80% of the MCL, the MT is set at the current concentration plus 20 percent. When current or historical water quality for the key constituents has not been measured, the MT will be set as the MCL and adjusted as needed after water quality monitoring commences. The applicable MTs for groundwater quality in the GSP apply to degraded groundwater quality as a direct

result of impacts from SGMA-related groundwater management activities and implementation of potential future water supply development opportunities under the GSP that cause an exceedance to occur. Future exceedances of the MT may occur due to activities or conditions unrelated to implementation of the GSP, in which case they would not constitute an MT exceedance that contributes to an UR.

While GSA causation will need to be evaluated on a case-by-case basis, general procedures to be followed and considerations to be made in evaluating GSA causation for groundwater quality degradation include:

- Review of monitoring data collected for the GSP
- Review work by others in/near the area of concern with respect to key constituent monitoring
- Evaluation of whether contaminant concentration change is related to vertical or horizontal groundwater movement
- Evaluation of changes in groundwater levels (rise or fall) in causing increased concentrations of the key constituent
- Evaluation of available baseline/historical data for the key constituent in the area of concern, where groundwater quality degradation is occurring, with respect to the timing of GSA potential future water supply development opportunities implementation
- Recommendation of additional monitoring steps as necessary (e.g., confirmation sampling, and review of existing wells nearby that could be added to the monitoring network)

Based on the assessment steps described above, a tentative conclusion regarding GSA causation will be made and supporting evidence outlined. The analysis will be presented in the Annual Report or Periodic Evaluation for DWR review.

Establishing baseline concentrations for key constituents requires multiple sampling events during both the wet (winter/spring) and dry seasons (summer/fall). Additional baseline sampling is needed for key constituents in some RMS wells. In general, baseline concentrations for key constituents will be established based upon a minimum of two wet and two dry season sampling events. The baseline sampling events will occur within the initial five years of GSP implementation, or as soon thereafter for new RMS wells that are constructed and/or added after 2022, to provide the necessary data to establish the range of baseline concentrations for each RMS well's key constituent(s) by the Periodic Evaluation. Annual sampling events will be conducted to compare against baseline concentrations for each key constituent.

The technical justification for using a 20% margin above baseline concentrations to set the MT for RMS wells that already exceed the MCL for a key constituent is based on evaluation of three potential sources of fluctuations in key constituent concentrations from a series of sampling events at a given well:

- 1) Variability/uncertainty related to analytical lab methods/analysis
- 2) Variability/uncertainty caused by slight differences in sampling methods or purge rates (this will be addressed to some extent with GSP sampling protocols, but some variability can still occur between different sampling personnel or from one sampling event to another, plus existing data that may have been collected using slightly different protocols);

- 3) Fluctuations/variability in constituent concentrations in the groundwater system due to the rise/fall of groundwater levels, changes in local groundwater flow directions, fluctuations in recharge rates, water year type, and other natural conditions affecting the groundwater system

Consultation with the EBMUD analytical laboratory indicated that the margin of error associated with analytical lab measurements within a method may be set as:

- a. The method reference used in the analysis
- b. Statistically calculated based on historical data of laboratory fortified blank samples or fortified matrix spikes
- c. Estimating the uncertainty of measurement by taking into consideration all sources contributing to the uncertainty, including, but not limited to, standard references, reference materials, equipment used, environmental conditions, properties and conditions of the samples being tested or calibrated, and the operator
- d. Based on the National Environmental Laboratory Accreditation Program Institute (TNI) acceptable criteria of performance testing (PT) study; these may be set by EPA or statistically calculated for the study

Table 3-6. Analytical Laboratory Error of Measurement for Key Constituents				
Analyte	Method Reference	Method Reference or Laboratory Statistically Calculated Precision (% RPD ¹)	Method Acceptance Criteria for Accuracy (% Recovery)	TNI Acceptance Criteria of Performance Testing Study (% Recovery)
TDS	SM2540C	10%	±15%	±20%
Nitrate	EPA 300.1	At ≥ 10xMRL ² : ±10% RPD At < 10xMRL: ±20% RPD	±15%	±10%
Chloride	EPA 300.1	At ≥ 10xMRL: ±10% RPD At < 10xMRL: ±20% RPD	±15%	±15%
Arsenic	EPA 200.8	20%	±15%	±30%

¹ Relative percent difference (RPD).

² Minimum reporting limit (MRL) is typically set by a lab as 3 x Method Detection Limit ≈ 3 x Standard Deviation.

Based on the laboratory input summarized above (**Table 3-6**), the error based on the “Method Acceptance Criteria for Accuracy” may be the best reference to use since it is 15% for all the constituents and takes into consideration sources that contribute to the uncertainty.

Work being conducted for other programs, such as the Central Valley Irrigated Lands Regulatory Program (ILRP), requires extensive review of QA/QC procedures for field sampling and analytical lab analyses for various constituents of concern (including nitrate and TDS), along with quantification of the expected

Relative Percent Difference (RPD) that may occur with key constituent concentrations from groundwater quality sampling events. An RPD of up to 25% constitutes the acceptance criteria for field duplicate samples, which accounts for analytical laboratory plus field sampling methods/procedures, but not natural factors influencing the groundwater system. The groundwater system fluctuations/variability factor would add greater uncertainty beyond the 25% from laboratory and field sampling methods/procedures factors. Based on prior experience, the potential constituent fluctuations from various natural factors influencing the groundwater system likely exceed 5% and result in a total expected range of fluctuations from all three factors of greater than 30%. Therefore, use of a 20% margin above baseline conditions is likely a conservative (i.e., low) value relative to the reasonably expected range of fluctuations in constituent concentrations that could be expected to occur during a series of sampling events.

3.3.5.2. Relationship to Other Sustainability Indicators

Although there are potential relationships between groundwater quality and other sustainability indicators, setting MT for groundwater quality based on MCL for key constituents does not conflict with other sustainability indicators and associated MT. The management of groundwater for other sustainability indicators and associated MT relative to potential impacts on groundwater quality are addressed in those respective sections of this GSP.

3.3.5.3. Impact of Selected Minimum Thresholds on Adjacent Basins

The MT for groundwater quality established for the EBP Subbasin is intended to protect all beneficial uses within the EBP Subbasin, including municipal and domestic water supply uses, from groundwater quality degradation caused by overall groundwater basin extraction. Therefore, the MTs to avoid degradation of water quality are not likely to impact adjacent subbasins or their ability to achieve sustainability.

3.3.5.4. Minimum Thresholds Impact on Beneficial Uses and Users

Municipal and domestic supplies are the most restrictive beneficial uses for groundwater quality, with water quality objectives equal to drinking water MCLs. Setting the groundwater quality MT for key constituent concentrations at respective drinking water MCLs, or within a tolerance of no more than a 20% margin above existing concentrations, is intended to limit degradation of groundwater quality caused by overall groundwater basin extraction, to protect municipal and domestic supply beneficial uses. Protection of municipal and domestic beneficial uses is also protective of other groundwater beneficial uses.

3.3.5.5. Comparison Between Minimum Thresholds and Relevant State, Federal, or Local Standards

The Federal and State drinking water quality standards are represented through MCLs that are applicable to public drinking water supplies and provide reasonable guidance on water quality for safe drinking water in non-public supplies. As described above, the State of California drinking water MCLs for arsenic, nitrate, chloride, and TDS are being used to define MT for groundwater quality degradation caused by overall

groundwater basin extraction, except in cases where existing baseline concentrations already exceed these levels or are already within 20% of the MCL (in which case, the MT will be baseline concentration plus 20%).

3.3.5.6. Minimum Thresholds Measurement Method

Groundwater quality will be monitored on an annual basis at identified representative groundwater quality monitoring indicator wells presented in **Table 3-5** and **Figure 3-9**. Monitoring will be conducted through sampling of groundwater quality conducted for the GSP monitoring. All groundwater quality sampling and analysis will be conducted in accordance with the monitoring protocols and procedures described in the GSP. The monitoring network and monitoring protocols for groundwater quality are described in Section 3.5 (Monitoring Network and Monitoring Protocols for Data Collection).

3.3.6. Depletion of Interconnected Surface Water

The GSP regulations require the use of a rate or volume of depletions of interconnected surface water, “caused by groundwater use that has adverse impacts on beneficial uses of the surface water and may lead to undesirable results,” to define the MTs, but allow for the use of groundwater levels as a proxy. Depletion of interconnected surface water in the Subbasin would become significant and unreasonable if excessive regional groundwater pumping causes insufficient water to be available to support potential beneficial uses/users (e.g., aquatic species, GDEs). Locally defined significant and unreasonable conditions were determined based on discussions with GSA staff and technical representatives, input received from interested stakeholders and the public through public meetings, and through individual stakeholder input to various GSA representatives.

The MTs for depletion of interconnected surface water are average shallow groundwater levels (as a proxy) set at two feet below the current baseline average water levels. This MT will be refined with the collection of additional data to improve the understanding of stream-aquifer connectivity and potential for streamflow depletion related to groundwater pumping. The proposed MT requires the use of shallow wells along major creeks, which are planned to be installed for use as RMS wells. The MTs are based on model-estimated groundwater levels. Documentation for the depletion of interconnected surface water depletion MTs is provided in **Appendix 3.F**. Undesirable results for the depletion of interconnected surface water are deemed to occur when more than 50% of RMS wells exceed the MT for two consecutive Spring measurements.

As described in the HCM in Chapter 2, data are extremely limited for the evaluation of streamflow depletion. Regional groundwater levels are generally expected to potentially be below stream thalwegs in the eastern portion of the Subbasin, and above stream thalwegs in the western portion of the Subbasin. There is very limited existing information to define the gaining and losing reaches of the EBP Subbasin streams and the extent of connection between groundwater and surface water under various seasonal and water year type climatic conditions. Thus, a significant data gap exists related to the depletion of surface water that will be addressed during the GSP implementation period (see Chapter 5).

Given the general lack of available data relating to streamflow, gaining, and losing reaches, and overall spatial/temporal connections between surface water and groundwater, initial MT are based on results

from the EBP Subbasin groundwater model. Additional data to be collected during GSP implementation to fill data gaps related to depletion of interconnected surface water will be reviewed in conjunction with DWR ISW guidance when it is available, and MT for depletion of interconnected surface water will be revisited at that time. The initial stream depletion MTs are summarized in **Table 3-7** for locations shown on **Figure 3-11**. An example RMS well hydrograph with SMC is provided in **Figure 3-12**.

Well I.D.	Reference Point Elevation (ft MSL)	Screen Top-Bottom (ft, bgs)	Model Baseline GW Elevation (ft MSL)	Observed Baseline GW Elevation (ft MSL)	MT Depth (ft bgs)	MT Elev (ft MSL)	GSA
SPC-1	30	TBD ¹	27-29	NA ²	5	25	EBMUD
SPC-2	70	TBD	59-60	NA	13	57	EBMUD
SPC-3	76	TBD	48-51	NA	30	46	EBMUD
SLC-1	9	TBD	6-7	NA	5	4	EBMUD
SLC-2	70	TBD	35-46	NA	37	33	EBMUD

¹ To Be Determined (TBD); information will be updated upon completion of construction planned for 2022.

² Not Available (NA), RMS well not yet installed.

3.3.6.1. Methodology

There is very limited to no data to characterize streamflow and stream-aquifer interconnections for the largest streams in the EBP Subbasin, which include San Pablo Creek, Wildcat Creek, San Leandro Creek, and San Lorenzo Creek. San Pablo Creek and San Leandro Creek are the streams that have been assigned initial MT. San Lorenzo Creek was not assigned MT because it is lined through most of the EBP Subbasin, and the unlined portion is near San Francisco Bay, where the river stage is controlled by tide levels. Wildcat Creek was not assigned an MT because it flows very close to San Pablo Creek, which should also be representative of conditions along Wildcat Creek. Additional information was developed for San Pablo and San Leandro Creeks under a DWR Proposition 68 grant (e.g., isotope sampling; synoptic streamflow measurements), and additional data collection to characterize the potential for streamflow depletion is planned for the early years (initial ten years) of GSP implementation. Therefore, due to the current lack of sufficient field data and DWR ISW guidance, the technical analysis to evaluate UR, using MT and MO, is based on steady-state groundwater model runs from the 1960s, the sustainability model run, and the current conditions model run. The model results related to stream depletion are summarized in **Appendix 3.F**.

Use of groundwater levels as a proxy is based on the analysis/justification using model results as summarized below. The groundwater model runs for baseline conditions (3,600 AFY), sustainability (12,500 AFY), and 1960s (23,000 AFY) pumping conditions were compared for changes in stream-aquifer connectivity, changes in average streamflow, and changes in shallow groundwater levels. The change in connectivity along each major stream reach between the current baseline and sustainability model runs

included no change for San Pablo, San Leandro, and San Lorenzo Creeks, and a decline of 7% in connectivity for Wildcat Creek. The change in average streamflow from baseline to sustainability run conditions ranged from 0 cubic feet per second (cfs) (San Lorenzo Creek) to between 0.3 (Wildcat Creek) and 0.6 cfs (San Pablo Creek) for the other three major creeks. Changes in shallow groundwater levels along San Pablo and San Leandro Creeks ranged from 0.0 to 1.8 feet.

The change in connectivity along each major stream reach between the current baseline and the 1960s run resulted in no change for San Pablo Creek, and declines ranging from 4% (Wildcat Creek) to 29% and 37% for San Leandro and San Lorenzo Creeks, respectively. However, it should be noted that the change in connectivity along San Lorenzo Creek has no significant effect on stream – aquifer interaction because the channel is lined. The decrease in average streamflow from baseline to the 1960s run conditions ranged from 0.1 to 0.3 cfs (Wildcat and San Pablo Creeks) to between 0.6 (San Lorenzo Creek) and 1.5 cfs (San Leandro Creek). The change in average streamflow for San Lorenzo Creek only occurs along the unlined reach of the creek within 0.75 miles of San Francisco Bay, where the stream stage is primarily controlled by tidal fluctuations. Changes in shallow groundwater levels along the creeks ranged from 0.1 feet (San Pablo Creek) to 6 feet (San Leandro Creek). A decrease in shallow groundwater levels beneath/adjacent to creek channels will tend to cause a reduction of connectivity (in cases where shallow groundwater levels fall below the creek bed) and a decrease in streamflow due to either decreased groundwater flow into the creeks (stream discharge) or increased seepage of streamflow into the aquifer (stream recharge). The groundwater model helps demonstrate and quantify this relationship between shallow groundwater levels and changes in connectivity and streamflow.

Steady-state model results indicate that depletion of interconnected surface water impacts were considerably greater for San Leandro Creek in the 1960s (by a factor of 3 to 4 times) compared to what would occur with pumping at sustainable yield levels, whereas impacts along San Pablo Creek are slightly less for the 1960s model run. The reason for these impact differences is that pumping in the 1960s was concentrated in the southern EBP Subbasin with very limited pumping in the northern EBP Subbasin, whereas the sustainability run included evenly distributed pumping (in proportion to transmissivity) from north to south.

Overall, this analysis suggests the use of an average groundwater level decline of two feet in shallow wells along major creeks (San Pablo and San Leandro Creeks) as the basis for an MT, which is based primarily on model results for shallow groundwater level differences between the baseline and sustainable yield model runs. This analysis does not specifically address the issue that summer baseflow periods are the most critical; such an analysis requires additional field data collection to characterize current baseflow conditions, followed by model updates and revisions to these streamflow depletion MT.

3.3.6.2. Relationship to Other Sustainability Indicators

The relationships between the depletion of interconnected surface water MTs and other sustainability indicators are described below.

1. **Chronic Lowering of Groundwater Levels.** The methodology to establish MT for groundwater levels is designed to avoid chronic declines in groundwater levels, which is consistent with setting the depletion of interconnected surface water MT to limit future increases in depletion of surface water.

2. **Reduction of Groundwater Storage.** The reduction of groundwater storage MT is based on pumping volumes, whereas the depletion of interconnected surface water MT is based on location, timing, and amount of depletions of interconnected surface water. Since most groundwater pumping is from wells screened in the Intermediate/Deep Aquifer Zones (greater than 200 ft bgs) that are separated from the Water Table Aquifer Zone (upper 50 feet) by extensive clay layers, it is anticipated that shallow groundwater levels that may be connected to streams will experience minimal changes that would in turn limit changes in stream depletion.
3. **Seawater Intrusion.** The seawater intrusion MTs are based on chloride concentrations in sentinel wells in the shallow, intermediate, and deep aquifer zones, whereas the depletion of interconnected surface water MT are based on the location, timing, and amount of depletions of interconnected surface water. Thus, seawater intrusion MTs do not directly relate to or conflict with the depletion of interconnected surface water MT.
4. **Land Subsidence.** The depletion of interconnected surface water MT is based on the location, timing, and amount of depletions of interconnected surface water, whereas the land subsidence MT is based on vertical changes in land surface elevation derived from InSAR data. Therefore, land subsidence MTs do not directly relate to or conflict with the depletion of interconnected surface water MT.
5. **Degraded water quality.** The depletion of interconnected surface water MTs is not expected to result in a significant or unreasonable change in groundwater quality.

3.3.6.3. Impact of Selected Minimum Thresholds on Adjacent Basins and

The selected minimum thresholds for depletion of interconnected surface water to adjacent basins will not impact the ability of adjacent basins to be sustainable.

3.3.6.4. Minimum Thresholds Impact on Beneficial Uses and Users

The selected MT for the depletion of interconnected surface water will help protect beneficial uses/users that are dependent on streamflow, which may include potential GDEs along particular reaches of some creeks. However, beneficial users (i.e., well owners) pumping shallow groundwater near creeks may potentially be impacted by having their pumping restricted (if the GSAs decided to implement policies to restrict pumping) due to the MT for depletion of interconnected surface water established under this GSP.

3.3.6.5. Comparison between Minimum Thresholds and Relevant State, Federal or Local Standards

There are no Federal, State, or local standards that exist for the depletion of interconnected surface water.

3.3.6.6. Minimum Threshold Measurement Method

The MT for depletion of interconnected surface water will be based on measured groundwater levels in shallow wells to be installed early in GSP implementation.

3.3.7. Management Area Minimum Thresholds

No management areas were designated for the EBP Subbasin.

3.4. Measurable Objectives

(CCR Title 23, Section 354.30)

As detailed below, the MOs represent the expected operating conditions for the EBP Subbasin during the sustainability period. If the GSAs successfully operate according to the MOs described, the Subbasin will be operating sustainably. MO and interim milestones are detailed below.

A description of the MOs and how they were established is provided, along with recognition of the anticipated fluctuations in EBP Subbasin conditions around the established MO. This section describes how the GSP helps to meet each MO, how each measurable objective is intended to achieve the sustainability goal for the Plan area for the long-term beneficial uses, and how the interim milestones are intended to reflect the anticipated progress toward the MO during the 2022 to 2042 implementation period.

The GSP regulations define MO as specific, quantifiable criteria for the maintenance or improvement of specific groundwater conditions that have been included in an adopted Plan to achieve the sustainability goal for the basin.

Per GSP Regulations (354.30):

1. Measurable objectives shall be established, “...including interim milestones in increments of five years, to achieve the sustainability goal for the basin within 20 years of Plan implementation and to continue to sustainably manage the groundwater basin over the planning and implementation horizon.” (354.30.a)
2. “Measurable objectives shall be established for each sustainability indicator, based on quantitative values using the same metric and monitoring sites as are used to define the minimum thresholds.” (354.30.b)
3. “Measurable objectives shall provide a reasonable margin of operational flexibility under adverse conditions, which shall take into consideration components such as historical water budgets, seasonal and long-term trends, and periods of drought, and be commensurate with levels of uncertainty.” (354.30.c)
4. “...a representative measurable objective for groundwater elevation to serve as the value for multiple sustainability indicators...” may be established where “...the Agency can demonstrate that the representative value is a reasonable proxy for multiple individual measurable objectives as supported by adequate evidence.” (354.30.d)
5. “Each Plan shall describe a reasonable path to achieve the sustainability goal for the basin within 20 years of Plan implementation, including a description of interim milestones for each relevant sustainability indicator, using the same metric as the measurable objective, in increments of five years.” (354.30.e)

The MO developed for each applicable sustainability indicator in this GSP are based on the current understanding of the Plan Area and Basin Setting as discussed in detail in Chapter 2. RMS wells are identified for monitoring of MO and interim milestones for each sustainability indicator.

3.4.1. Chronic Lowering of Groundwater Levels

Measurable objectives and interim milestones for chronic lowering of groundwater levels are described below.

3.4.1.1. Measurable Objectives

Measurable objectives for groundwater levels were established in accordance with the sustainability goal through review and evaluation of measured groundwater level data and future projected fluctuations in groundwater levels, utilizing the numerical groundwater flow model (**Appendix 6.E**), which simulated implementation of potential future water supply development opportunities with representative long-term hydrology. This analysis provides estimates of the expected groundwater level variability due to climatic and operational variability. Both annual (year-to-year) and seasonal (winter/spring to summer/fall) variability were considered. Measurable objectives for groundwater levels were determined based on recent groundwater level measurements and/or model-derived groundwater levels. MO were established based on the average of recent (i.e., the last ten years) observed measurements. If sufficient data were available, the average (of high and low) of model-simulated groundwater elevations was used to determine the MO. Measurable objectives for groundwater levels for each sustainability indicator well or RMS are summarized in **Table 3-8**, and locations of groundwater level sustainability indicator wells are shown in **Figure 3-1**. Groundwater level hydrographs showing MO for each groundwater level sustainability indicator well are provided in **Appendix 3.A**, and examples are provided in **Figures 3-2 through 3-4**.

Well I.D.	Reference Point Elevation (NAVD88)	Well Depth (ft bgs)	Screen Top-Bottom (ft bgs)	Model Layer(s)	Aquifer Designation	MO Depth (ft bgs)	MO Elev ¹ (NAVD88)	GSA ²
MW-5S	17.676	210	200-210	3-4	Shallow/Int	6	12	EBMUD
MW-5I	17.676	325	315-325	6	Intermediate	7	11	EBMUD
MW-5D	17.468	640	500-630	9-12	Deep	19	-2	EBMUD
MW-8D	18.427	490	420-480	7-9	Deep	23	-5	EBMUD
MW-9S	58.212	120	110-120	3	Shallow	21	37	EBMUD
MW-9I	58.212	210	200-210	5	Intermediate	34	24	EBMUD
MW-9D	58.212	335	325-335	6	Intermediate	48	10	EBMUD
MW-10S	15.636	120	100-120	3	Shallow	4	12	EBMUD
MW-10I	15.636	360	340-360	7	Intermediate	8	8	EBMUD
MW-10D	15.636	610	590-610	11	Deep	17	-1	EBMUD

Table 3-8. Summary of Groundwater Level Measurable Objectives for RMS								
Well I.D.	Reference Point Elevation (NAVD88)	Well Depth (ft bgs)	Screen Top-Bottom (ft bgs)	Model Layer(s)	Aquifer Designation	MO Depth (ft bgs)	MO Elev ¹ (NAVD88)	GSA ²
S2-MWS1	15.501	85	50-80	2	Shallow	3	13	EBMUD
S2-MWS2	15.501	205	140-180	3-4	Shallow	3	13	EBMUD
S2-MWD1	18.147	555	480-500	7-8	Deep	12	6	EBMUD
MW-N1I	67.286	220	160-210	6	Intermediate	23	44	EBMUD
MW-N3S	13.635	95	60-90	2	Shallow	7	7	EBMUD
MW-S2I	16.82	320	230-310	6	Intermediate	12	5	Hayward
Well D	52.03	600	500-585	9-11	Deep	45	7	Hayward
Well E	14.31	525	470-490, 500-525	9-10	Deep	41	-27	Hayward

¹ The actual MO is based on the groundwater elevation, but the depth to water corresponding to the surface elevation in the project database is also provided.

² Each GSA is responsible for collecting groundwater levels for the RMS wells within their GSA area.

3.4.1.2. Interim Milestones

Interim milestones for chronic lowering of groundwater levels were established at five-year intervals over the Implementation Period from 2022 to 2042, at years 2027, 2032, and 2037. Since the MOs effectively represent current conditions under which the EBP Subbasin is already sustainable, interim milestones were set equal to the MO. Interim milestones for groundwater levels for each sustainability indicator well are summarized in **Table 3-9**, and locations of groundwater level RMS wells are shown in **Figure 3-1**.

Table 3-9. Summary of Groundwater Level Interim Milestones for RMS										
Well I.D.	Model Layer(s)	2027 DTW (ft bgs)	2032 DTW (ft bgs)	2037 DTW (ft bgs)	2042 DTW (ft bgs)	2027 Elev (NAVD88)	2032 Elev (NAVD88)	2037 Elev (NAVD88)	2042 Elev (NAVD88)	GSA
MW-5S	3-4	6	6	6	6	12	12	12	12	EBMUD
MW-5I	6	7	7	7	7	11	11	11	11	EBMUD
MW-5D	9-12	19	19	19	19	-2	-2	-2	-2	EBMUD
MW-8D	7-9	23	23	23	23	-5	-5	-5	-5	EBMUD
MW-9S	3	21	21	21	21	37	37	37	37	EBMUD
MW-9I	5	34	34	34	34	24	24	24	24	EBMUD
MW-9D	6	48	48	48	48	10	10	10	10	EBMUD
MW-10S	3	4	4	4	4	12	12	12	12	EBMUD

Table 3-9. Summary of Groundwater Level Interim Milestones for RMS

Well I.D.	Model Layer(s)	2027 DTW (ft bgs)	2032 DTW (ft bgs)	2037 DTW (ft bgs)	2042 DTW (ft bgs)	2027 Elev (NAVD88)	2032 Elev (NAVD88)	2037 Elev (NAVD88)	2042 Elev (NAVD88)	GSA
MW-10I	7	8	8	8	8	8	8	8	8	EBMUD
MW-10D	11	17	17	17	17	-1	-1	-1	-1	EBMUD
S2-MWS1	2	3	3	3	3	13	13	13	13	EBMUD
S2-MWS2	3-4	3	3	3	3	13	13	13	13	EBMUD
S2-MWD1	7-8	12	12	12	12	6	6	6	6	EBMUD
MW-N1I	6	23	23	23	23	44	44	44	44	EBMUD
MW-N2S	TBD	14	14	14	14	5	5	5	5	EBMUD
MW-N2I	TBD	14	14	14	14	5	5	5	5	EBMUD
MW-N3S	2	7	7	7	7	7	7	7	7	EBMUD
MW-S2I	6	12	12	12	12	5	5	5	5	Hayward
Well D	9-11	45	45	45	45	7	7	7	7	Hayward
Well E	9-10	41	41	41	41	-27	-27	-27	-27	Hayward

3.4.1.3. Achieving and Maintaining Sustainability

The combination of interim milestones and MO reflects how the EBP Subbasin anticipates maintaining sustainability with the continued use of existing groundwater extraction facilities. Future projections will require assumptions about future hydrologic conditions, including the sequence of wet, average, and dry climatic years. The future climatic assumptions for the implementation and sustainability periods used in this GSP incorporate sequences of wet, average, and dry years that represent overall long-term average historical climatic conditions over the implementation and sustainability periods, including one prolonged period of dry years. This overall pattern of anticipated fluctuations in groundwater levels reflects a slight decrease in average groundwater elevations (at some locations) associated with a very modest increase in overall groundwater extraction using existing (and potential future) facilities.

3.4.1.4. Impact of Selected Measurable Objectives on Adjacent Basins

The MOs established for the EBP Subbasin Plan area provide a good basis for evaluation of anticipated impacts on adjacent subbasins from implementation of the GSP. This is because MO is set to reflect the average groundwater levels to be maintained during the sustainability period. Ultimately, the potential for impacts on adjacent subbasins will be primarily a function of average water levels in the Plan area during the sustainability period, average water levels in adjacent subbasins during the sustainability period, and natural groundwater flow conditions that would be expected to occur at Plan area boundaries. The average groundwater levels expected for the Plan area are reflected in the MO. Groundwater model results indicate that the average groundwater levels reflected in the MO will result in similar groundwater

elevations as in the historical period from 1990 to 2015. Therefore, the potential future water supply development opportunities outlined in this GSP are expected to have no significant impacts on adjacent subbasins (compared to historical conditions) and will not hinder the ability of adjacent subbasins to be sustainable.

3.4.2. Reduction of Groundwater Storage

MOs and interim milestones for the reduction of groundwater storage are described below.

3.4.2.1. Measurable Objective

The MO for reduction of groundwater storage is based on the volume of annual groundwater pumping and is half of the estimated sustainable yield or 6,250 AFY, measured as a five-year rolling average. Available data for current groundwater pumping amounts are provided in **Appendix 3.B**.

3.4.2.2. Interim Milestones

The interim milestones for the reduction of groundwater storage are the same as the MO.

3.4.2.3. Achieving and Maintaining Sustainability

The combination of interim milestones and MO reflects how the EBP Subbasin will maintain sustainability. Annual pumping volumes can exceed the MO while the EBP Subbasin still remains sustainable. However, additional work is needed during the early years of GSP implementation to further evaluate the sustainable yield. The initial MO was set at a lower level until further analysis of the sustainable yield is conducted.

3.4.2.4. Impact of Selected Measurable Objectives on Adjacent Basins

Groundwater model results indicate that the average annual groundwater pumping volumes reflected in the MO will result in no significant impacts on groundwater storage in adjacent basins. Therefore, the potential future water supply development opportunities outlined in this GSP will not hinder the ability of adjacent basins to be sustainable with regard to groundwater storage.

3.4.3. Seawater Intrusion

Information on historical seawater intrusion in the EBP Subbasin is presented in the HCM (Chapter 2). The EBP Subbasin has not experienced significant seawater intrusion in the past, even when groundwater levels in the Intermediate and Deep Aquifer Zones were substantially lower in the 1950s and 1960s. A minor amount of seawater intrusion in the Shallow Aquifer Zone near the San Francisco Bay Margin (e.g., San Pablo Wellfield in Richmond, Alameda Island) reportedly occurred in some areas of the EBP Subbasin prior to the 1930s. Due to the potential to draw Intermediate and Deep Aquifer groundwater elevations below sea level in the future, there is at least the potential for seawater intrusion to occur. Thus, sentinel wells were designated in the shallow, intermediate, and deep aquifer zones to detect any potential

seawater intrusion. MO and interim milestones for seawater intrusion were established and are described below.

3.4.3.1. Measurable Objective

The MOs for seawater intrusion were set at average baseline conditions at each sentinel well. Average baseline concentrations were (or will be) calculated using, at a minimum, two dry season (summer/fall) measurements and two wet season (winter/spring) measurements. This methodology mimics the method used to calculate average baseline concentrations for seawater intrusion MT and groundwater quality MO and MT. Measurable objectives for seawater intrusion for each sentinel RMS well are summarized in **Table 3-10**, and locations of seawater intrusion sustainability indicator wells are shown in **Figure 3-7**. Chloride concentration chemographs showing MO for each seawater intrusion sustainability indicator well are provided in **Appendix 3.C**.

Well I.D.	Reference Point Elevation (NAVD88)	Well Depth (ft bgs)	Screen Top-Bottom (ft bgs)	Aquifer Designation	MO mg/L ¹	GSA ²
MW-5C (Port of Oakland)	TBD	185	160-180	Shallow	TBD	EBMUD
MW-5D	17.468	640	500-630	Deep	81	EBMUD
USGS_374004 122092105	TBD	138	TBD	Shallow	TBD	EBMUD
USGS_374004 122092104	TBD	318	TBD	Intermediate	TBD	EBMUD
MW-3C (Port of Oakland)	TBD	210	185-205	Intermediate	TBD	EBMUD
MW-10S	15.636	120	100-120	Shallow	33	EBMUD
MW-10I	15.636	360	340-360	Intermediate	54	EBMUD
MW-10D	15.636	610	590-610	Deep	100	EBMUD
S2-MWS2	15.501	205	140-180	Shallow	TBD	EBMUD
S2-MWD1	18.147	555	480-500	Deep	195	EBMUD
MW-N3S	13.635	95	60-90	Shallow	TBD	EBMUD
MW-B-Shallow	TBD	232	172-182; 212-222	Shallow	TBD	Hayward
MW-B-Intermediate	TBD	382	302-312; 362-372	Intermediate	TBD	Hayward
Well E	14.31	535	470-525	Deep	TBD	Hayward

- ¹. Where TBD is listed, not enough data was available to calculate a baseline concentration. Once more data becomes available, MO will be set. The minimum baseline sampling required to establish MT are two wet season and two dry season sampling events.
- ². Each GSA is responsible for collecting groundwater levels for RMS within its GSA area.

3.4.3.2. Interim Milestones

The Interim Milestones for seawater intrusion are the same as the MO. These interim milestones are summarized in **Table 3-11**.

Table 3-11. Summary of Seawater Intrusion Interim Milestones for RMS					
Well I.D.	2027 (mg/L)	2032 (mg/L)	2037 (mg/L)	2042 (mg/L)	GSA
MW-5C (Port of Oakland)	TBD	TBD	TBD	TBD	EBMUD
MW-5D	81	81	81	81	EBMUD
USGS_374004122092105	TBD	TBD	TBD	TBD	EBMUD
USGS_374004122092104	TBD	TBD	TBD	TBD	EBMUD
MW-3C (Port of Oakland)	TBD	TBD	TBD	TBD	EBMUD
MW-10S	33	33	33	33	EBMUD
MW-10I	54	54	54	54	EBMUD
MW-10D	100	100	100	100	EBMUD
S2-MWS2	TBD	TBD	TBD	TBD	EBMUD
S2-MWD1	195	195	195	195	EBMUD
MW-N3S	TBD	TBD	TBD	TBD	EBMUD
MW-B-Shallow	TBD	TBD	TBD	TBD	Hayward
MW-B-Intermediate	TBD	TBD	TBD	TBD	Hayward
Well E	TBD	TBD	TBD	TBD	Hayward

mg/L = milligrams per liter

3.4.3.3. Achieving and Maintaining Sustainability

The combination of interim milestones and MO reflects how the EBP Subbasin will maintain sustainability through 2042 and beyond. Since chloride concentrations have been low and stable in the majority of the sentinel wells, maintaining sustainability relative to this indicator is expected to occur with maintenance of existing conditions and some moderate additional development of the EBP Subbasin (if this were to occur).

3.4.3.4. Impact of Selected Measurable Objectives on Adjacent Basins

The established MO aims to maintain baseline conditions calculated based on sampling data available for sentinel wells. Therefore, the MOs will have no impact on adjacent subbasins.

3.4.4. Land Subsidence

Information on historical subsidence in the EBP Subbasin is presented in the HCM (Chapter 2). The EBP Subbasin has not experienced significant subsidence or damage to infrastructure in the past, even when groundwater levels in the Intermediate and Deep Aquifer Zones were substantially lower in the 1950s and 1960s. However, due to the predominance of clay sediments and at least the potential for subsidence to occur in the future, MO and interim milestones for land subsidence were established and are described below.

3.4.4.1. Measurable Objective

The MO for land subsidence is set at the current conditions of no long-term subsidence. The InSAR dataset has a measurement error of 0.07 ft, and, rounding up, measured annual subsidence of 0.1 feet or less would not be considered measurable subsidence. Therefore, the MO for subsidence is set at 0.1 feet per year. This is not meant to allow for a continued rate of 0.1 feet/year of subsidence in the EBP Subbasin. Rather, this is an acknowledgment that there may be instances where measurement uncertainty will indicate a rate of subsidence that is within the noise of the data and is equivalent to no subsidence in the Subbasin. The locations of land subsidence RMS wells are provided in **Figure 3-8**. Supporting data for the development of land subsidence SMC are provided in **Appendix 3.D**.

3.4.4.2. Interim Milestones

The interim milestones for land subsidence are set to current conditions of zero long-term subsidence, and equal to the MO.

3.4.4.3. Achieving and Maintaining Sustainability

The combination of interim milestones and MO reflects how the EBP Subbasin will maintain sustainability through 2042 and beyond. There is no change between current conditions and sustainable conditions. Therefore, by maintaining the current conditions of no long-term subsidence, the IM/MO will allow the EBP Subbasin to achieve and maintain sustainability.

3.4.4.4. Impact of Selected Measurable Objectives on Adjacent Basins

The MOs for land subsidence are set to maintain current conditions of no long-term subsidence. Therefore, the MO will not hinder the ability of adjacent basins to be sustainable with regard to land subsidence.

3.4.5. Degraded Water Quality

Varied levels of key constituents in groundwater affect water quality considerations throughout the EBP Subbasin (see Chapter 2). Elevated concentrations of naturally occurring and existing constituent concentrations resulting from historical land use practices are present in certain areas and aquifer depth zones of the EBP Subbasin. As noted in Chapter 2 (HCM), elevated concentrations of nitrate and TDS are present in some Shallow Aquifer Zone wells in the EBP Subbasin. It is possible that increases in these concentrations may occur due to historical nitrogen and salt loading in the unsaturated zone, independent of any GSP activities. The potential future water supply development opportunities and implementation actions are not intended to remediate these existing concentrations; however, they also are not anticipated to exacerbate these trends and conditions. Municipal and domestic supply (MUN) is a designated beneficial use for groundwater in the EBP Subbasin; therefore, groundwater quality degradation would become significant and unreasonable based on adverse impacts to this beneficial use. This GSP intends to implement potential future water supply development opportunities in ways that do not cause or exacerbate groundwater quality impacts to beneficial uses.

3.4.5.1. Measurable Objective

The MOs for groundwater quality are established to not exacerbate adverse impacts on all beneficial uses of groundwater resulting from overall groundwater basin extraction. MOs for the groundwater quality sustainability indicator are intended to ensure that overall groundwater basin extraction does not cause groundwater quality conditions to become unsuitable for any beneficial use, especially municipal and domestic supply uses, since these are the most restrictive from a water quality standpoint. The groundwater quality MOs are defined for individual RMS wells for key water quality constituents, including arsenic, nitrate, chloride, and TDS. As discussed in Chapter 2 of this GSP, nitrate is a water quality constituent of concern, occurring at elevated concentrations in shallow groundwater in some areas, likely as a result of historical land use practices. The MOs for arsenic, chloride, and TDS are intended to address additional potential groundwater quality impacts associated with overall groundwater basin extraction that may result from lowered groundwater levels in some areas or altered groundwater flow dynamics.

The RMS wells represent groundwater quality conditions across the EBP Subbasin and will be monitored by the GSAs. For all groundwater quality RMS wells, the MO concentrations for arsenic, nitrate, chloride, and TDS are or will be set at levels representative of recent/current baseline concentrations observed in the well with the intent to ensure that overall groundwater extraction does not adversely impact groundwater quality conditions. Recent concentrations over the past 10 to 15 years (or baseline concentrations to be established from groundwater sampling early in the GSP implementation period) are used as the basis for setting the MO concentrations. The MO concentrations are an average of the recent (i.e., since 2022) concentrations from baseline sampling for each of the key constituents. MO concentrations for groundwater quality for each sustainability indicator well are summarized in **Table 3-12**, and locations of groundwater quality sustainability indicator RMS wells are shown in **Figure 3-9**. Tables and graphs of historical results for key water quality constituents in the groundwater quality RMS wells are presented in **Appendix 3.E**. Additional groundwater quality sampling is still needed for some recently added RMS wells to establish baseline concentrations and the MO.

3.4.5.2. Interim Milestones

The interim milestones for the groundwater quality sustainability indicator are the same as the MO and include ensuring that, during the Implementation Period, overall groundwater basin extraction does not cause degradation of existing groundwater quality that would make groundwater unsuitable for the most restrictive beneficial use of municipal and domestic supply. The groundwater quality interim milestones are maintaining existing groundwater quality concentrations for arsenic, nitrate, chloride, and TDS at each RMS well over the Implementation Period, as summarized in **Table 3-13**. Consistent with the MO, groundwater quality interim milestones also include maintaining existing or historical groundwater quality conditions over the Implementation Period for wells in which the existing or historical conditions already exceed the MCL. The GSP does not include any plan or milestones specifically intended to improve groundwater quality conditions in wells with existing or historical MCL exceedances.

3.4.5.3. Achieving and Maintaining Sustainability

The combination of interim milestones and MO reflects how the EBP Subbasin will maintain sustainability by ensuring that overall groundwater basin extraction does not significantly and unreasonably degrade groundwater quality conditions or exacerbate already degraded conditions. The network of groundwater quality RMS wells will enable tracking of groundwater quality conditions as they relate to GSP activities and activities unrelated to GSP actions. If evaluation of groundwater quality monitoring suggests that GSP potential future water supply development opportunities are having adverse impacts on groundwater quality affecting beneficial uses, modifications to the GSP potential future water supply development opportunities may be required.

3.4.5.4. Impact of Selected Measurable Objectives on Adjacent Basins

Groundwater quality MO are set to protect and maintain groundwater quality conditions suitable for all beneficial uses in the EBP Subbasin, including municipal and drinking water supply, and are not anticipated to impact beneficial uses for groundwater in adjacent subbasins.

Table 3-12. Summary of Groundwater Quality Measurable Objectives for RMS

Well ID	Well Depth (ft bgs)	Screen Top-Bottom (ft bgs)	Aquifer Designation	MO Arsenic Concentration (µg/L)	MO Nitrate Concentration (mg/L)	MO Chloride Concentration (mg/L)	MO TDS Concentration (mg/L)	GSA Location	Measurement Frequency
MW-5S	210	200-210	Intermediate	2.5	1	57	456	EBMUD	Annual
MW-5I	325	315-325	Intermediate	10	1	60	450	EBMUD	Annual
MW-5D	640	500-630	Deep	0.8	1	80	462	EBMUD	Annual
MW-9S	120	110-120	Shallow	1.9	9.5	49	623	EBMUD	Annual
MW-9I	210	200-210	Intermediate	1.9	1	48	424	EBMUD	Annual
MW-9D	335	325-335	Intermediate	2.7	1	51	450	EBMUD	Annual
MW-10S	120	100-120	Shallow	6 ¹	0.7	33	356	EBMUD	Annual
MW-10I	360	340-360	Intermediate	5.2	1	54	454	EBMUD	Annual
MW-10D	610	590-610	Deep	2	1	100	508	EBMUD	Annual
S2-MWS1	85	50-80	Shallow	33.9	1	17,000	35,667	EBMUD	Annual
S2-MWS2	205	140-180	Shallow	2.5	8	1,140	2,820	EBMUD	Annual
S2-MWD1	555	480-500	Deep	30	1	195	648	EBMUD	Annual
MW-N1I ¹	220	160-210	Intermediate	8	8	200	420	EBMUD	Annual
MW-N3S ¹	95	60-90	Shallow	8	8	200	420	EBMUD	Annual
MW-S1I ¹	320	230-310	Intermediate	8	8	200	420	Hayward	Annual
Well D	600	500-585	Deep	1	8	56	414	Hayward	Annual
Well E ¹	525	470-490; 500-525	Deep	8	8	200	420	Hayward	Annual

¹ Values will be confirmed and/or adjusted as needed based on results from initial sampling for constituents.

Table 3-13. Summary of Groundwater Quality Interim Milestones for RMS																	
Well ID	2027 As (µg/L)	2032 As (µg/L)	2037 As (µg/L)	2042 As (µg/L)	2027 Nitrate (mg/L)	2032 Nitrate (mg/L)	2037 Nitrate (mg/L)	2042 Nitrate (mg/L)	2027 Cl (mg/L)	2032 Cl (mg/L)	2037 Cl (mg/L)	2042 Cl (mg/L)	2027 TDS (mg/L)	2032 TDS (mg/L)	2037 TDS (mg/L)	2042 TDS (mg/L)	GSA Location
MW-5S	2.5	2.5	2.5	1	1	1	1	1	57	57	57	57	456	456	456	456	EBMUD
MW-5I	10	10	10	10	¹	1	1	1	60	60	60	60	450	450	450	450	EBMUD
MW-5D	00.8	0.8	0.8	0.5	1	1	1	1	80	80	80	80	462	462	462	462	EBMUD
MW-9S	1.9	1.9	1.9	1.9	9.5	9.5	9.5	9.5	49	49	49	49	623	623	623	623	EBMUD
MW-9I	1.9	1.9	1.9	1.9	1	1	1	1	48	48	48	48	424	424	424	424	EBMUD
MW-9D	2.7	2.7	2.7	2.7	1	1	1	1	51	51	51	51	450	450	450	450	EBMUD
MW-10S	6 ¹	6 ¹	6 ¹	6 ¹	0.7	0.7	0.7	0.7	33	33	33	33	356	356	356	356	EBMUD
MW-10I	5.2	5.2	5.2	5.2	1	1	1	1	54	54	54	54	454	454	454	454	EBMUD
MW-10D	2	2	2	2	1	1	1	1	100	100	100	100	508	508	508	508	EBMUD
S2-MWS1	33.9	33.9	33.9	33.9	1	1	1	1	15,000	15,000	15,000	15,000	35,667	35,667	35,667	35,667	EBMUD
S2-MWS2	2.5	2.5	2.5	2.5	8	8	8	8	1,140	1,140	1,140	1,140	2,820	2,820	2,820	2,820	EBMUD
S2-MWD1	30	30	30	30	1	1	1	1	195	195	195	195	648	648	648	648	EBMUD
MW-N1I ¹	8	8	8	8	8	8	8	8	200	200	200	200	420	420	420	420	EBMUD
MW-N3S ¹	8	8	8	8	8	8	8	8	200	200	200	200	420	420	420	420	EBMUD
MW-S2I ¹	8	8	8	8	8	8	8	8	200	200	200	200	420	420	420	420	Hayward
Well D	5.31	5.31	5.31	5.31	18	18	18	18	56	56	56	56	414 ¹	414 ¹	414 ¹	414 ¹	Hayward
Well E ¹	8	8	8	8	8	8	8	8	200	200	200	200	420	420	420	420	Hayward

¹ Values will be confirmed and/or adjusted as needed based on results from initial sampling for constituents.

3.4.6. Depletion of Interconnected Surface Water

As described in the HCM in Chapter 2, regional groundwater levels are generally expected to be below stream thalwegs in the eastern portion of the EBP Subbasin, and above stream thalwegs in the western portion of the EBP Subbasin. There is very limited existing information to define the gaining and losing reaches of EBP Subbasin streams and the extent of connection between groundwater and surface water under various seasonal and water year type climatic conditions. Thus, a significant data gap exists related to the depletion of surface water that will be addressed during the GSP Implementation Period (see Section 3.5). Supporting data available for establishing SMC for depletion of interconnected surface water are provided in **Appendix 3.F**.

3.4.6.1. Measurable Objective

There is a general lack of available data relating to streamflow, gaining and losing reaches, and overall spatial/temporal connections between surface water and groundwater; accordingly, MO are established to maintain current conditions in the EBP Subbasin relative to shallow groundwater levels that serve as a proxy for stream depletion (see discussion in Section 3.3). New wells will be installed at representative locations along major creeks to establish baseline conditions and for future monitoring. Initial MOs have been established at five potential shallow monitoring well sites along two major creeks: San Pablo Creek and San Leandro Creek (**Table 3-14** and **Figure 3-13**). Additional data to be collected early in GSP implementation to fill data gaps related to depletion of interconnected surface water, combined with DWR ISW guidance when it is issued, will be used to develop updated MOs.

Well I.D.	Reference Point Elevation (ft MSL)	Screen Top-Bottom (ft bgs)	Model Baseline GW Elevation (ft MSL)	Observed Baseline GW Elevation (ft MSL)	MO Depth (ft bgs)	MO Elevation (ft MSL)	GSA
SPC-1	30	TBD ¹	27-29	NA ²	3	27	EBMUD
SPC-2	70	TBD	59-60	NA	11	59	EBMUD
SPC-3	76	TBD	48-51	NA	28	48	EBMUD
SLC-1	9	TBD	6-7	NA	3	6	EBMUD
SLC-2	70	TBD	35-46	NA	35	35	EBMUD

¹ To Be Determined (TBD); RMS Wells not drilled yet.

² Not Available (NA); RMS Well not drilled yet.

3.4.6.2. Interim Milestones

Initial interim milestones for depletion of interconnected surface water (**Table 3-15**) are the same as the MO. Additional data to be collected early in GSP implementation to fill data gaps related to the depletion of interconnected surface water, combined with DWR ISW guidance when it is issued, will be used to develop an updated IM.

Table 3-15. Summary of Interconnected Surface Water Interim Milestones for RMS										
Well I.D.	Reference Point Elevation (ft MSL)	2027 DTW ¹ (ft bgs)	2032 DTW (ft bgs)	2037 DTW (ft bgs)	2042 DTW (ft bgs)	2027 Elev ² (ft MSL)	2032 Elev (ft MSL)	2037 Elev (ft MSL)	2042 Elev (ft MSL)	GSA
SPC-1	30	3	3	3	3	27	27	27	27	EBMUD
SPC-2	70	11	11	11	11	59	59	59	59	EBMUD
SPC-3	76	28	28	28	28	48	48	48	48	EBMUD
SLC-1	9	3	3	3	3	6	6	6	6	EBMUD
SLC-2	70	35	35	35	35	35	35	35	35	EBMUD

¹ Depth to water

² Elevation

3.4.6.3. Achieving and Maintaining Sustainability

The EBP Subbasin is currently operated in a sustainable manner. The establishment of interim milestones and MO will reflect how the EBP Subbasin will maintain sustainability. Adhering to these interim milestones and MO will allow the EBP Subbasin to continue operating in a sustainable manner.

3.4.6.4. Impact of Selected Measurable Objectives on Adjacent Basins

The MO set for the EBP Subbasin will serve to maintain the sustainability of the EBP Subbasin, which would also serve to maintain the sustainability in adjacent subbasins. Therefore, the potential future water supply development opportunities implemented for this GSP are not expected to hinder the ability of adjacent basins to be sustainable. The MO set for stream depletion in the EBP Subbasin will not impact adjacent basins.

3.5. Monitoring Network

This section describes the monitoring network and includes the following subsections:

- Description of Monitoring Network
- Monitoring Protocols for Data Collection and Monitoring

- Representative Monitoring
- Assessment and Improvement of Monitoring Network

3.5.1. Description of Monitoring Network (CCR Title 23, Section 354.34)

This subsection on the monitoring network is intended to:

- Describe how the monitoring network will be used to collect sufficient data about groundwater conditions to evaluate the plan implementation
- Describe monitoring network objectives
- Describe how the monitoring network will be used to demonstrate progress towards achieving MO, monitor impacts to beneficial uses/users, monitor changes in groundwater conditions, and quantify annual changes in water budget components
- Describe how the monitoring network allows documentation of groundwater occurrence, flow, and hydraulic gradients, calculation of annual groundwater storage change, rate and extent of subsidence, and groundwater quality trends
- Describe how the monitoring network provides adequate coverage of sustainability indicators
- Describe monitoring network density and measurement frequency
- Describe monitoring network site selection rationale
- Describe data and reporting standards
- Provide map(s) with location and types of monitoring sites

The GSP groundwater level monitoring network was developed using existing wells in the EBP Subbasin and new monitoring wells installed in 2025. Plans are being developed for additional shallow monitoring wells along creeks to fill data gaps; these recommended wells will likely be installed during the next two years. The database for existing wells was reviewed with the following criteria in mind:

- Wells owned by GSAs are preferred
- Wells with known construction (screen intervals, depth) are preferred
- Wells with several years of water level data history (including recent data) are preferred
- Wells that are spatially distributed are preferred
- Wells that provide representation of Shallow, Intermediate, and Deep Aquifer Zones (Intermediate and Deep Zones are not present in all areas of EBP Subbasin) are preferred

To the extent possible, the network was composed of wells known to represent a specific aquifer depth zone and not screened across multiple zones. The network will enable the collection of data to assess sustainability indicators, the effectiveness of implementation actions that help to maintain sustainability, and to evaluate the MO and MT of each applicable sustainability indicator. In some cases (e.g., depletion of interconnected surface waters), available field data are insufficient to characterize groundwater conditions relative to that sustainability indicator, and additional data collection and installation of RMS

wells are proposed in the GSP Implementation Period. Therefore, this GSP uses best available data (e.g., model results only in some cases) to derive initial MT, which will be updated as better data and ISW guidance become available.

As described above, for the purposes of the GSP monitoring program, a subset of existing wells was identified that best meets certain criteria. Not all the criteria were satisfied for each well, but this effort resulted in 18 wells to represent the EBP Subbasin, with six wells in the Shallow Aquifer Zone, six wells in the Intermediate Aquifer Zone, and six wells in the Deep Aquifer Zone – referred to as the RMS wells.

These RMS wells are distributed throughout the EBP Subbasin to provide coverage of the entire area to the extent possible. This overall monitoring network generally allows for the collection of data to evaluate groundwater level fluctuations over time and to calculate the annual change in storage over a significant portion of the EBP Subbasin. The spatial coverage is currently greater in the southern portion of the Subbasin, where the vast majority of the groundwater pumping occurs. Furthermore, the monitoring frequency of the RMS wells will allow for the monitoring of seasonal highs and lows. For wells that have sufficient historical data records, future groundwater data will be compared to historical data. The monitoring network is expected to evolve over the long-term as new wells are drilled and water level data histories are developed. The monitoring network will be periodically reviewed, and improvements made where possible.

3.5.1.1. Groundwater Level Monitoring Program

The MT and MO for the chronic lowering of groundwater levels sustainability indicator are evaluated by monitoring groundwater levels. The SGMA regulations require a network of monitoring wells sufficient to demonstrate groundwater occurrence, flow direction, and hydraulic gradients between principal aquifers and surface water features. The overall monitoring network for groundwater levels is comprised of the RMS Wells and the potential supplemental wells (**Appendix 3.G**).

The objectives of the groundwater level monitoring program include:

- Improve the understanding of the occurrence and movement of groundwater; monitor local and regional groundwater levels, including seasonal and long-term trends; and identify vertical hydraulic head differences in the aquifer system and aquifer-specific groundwater conditions, especially in areas where potential development of additional groundwater resources may be considered in the future
- Detect the occurrence of, and factors attributable to, natural (e.g., direct infiltration of precipitation), irrigation, and surface water seepage to groundwater or potential future water supply development opportunities (e.g., injection and extraction wells) that affect groundwater levels and trends
- Establish a monitoring network to aid in the assessment of changes in groundwater storage;
- Generate data to better understand groundwater basin conditions and assess current and future local water supply availability and reliability; update analyses as additional data become available

A map of the Subbasin showing the potential supplemental monitoring network wells is provided in **Appendix 3.G**, along with a table listing each well. The current status of these wells and potential access arrangements for these supplemental wells is unknown at this time and will require further investigation. Updates on the supplemental monitoring network will be provided in future Annual Reports. **Figures 3-13 through 3-15** illustrate the locations of the wells selected as representative monitoring sites for monitoring of groundwater levels in the Shallow, Intermediate, and Deep Zone Aquifers, respectively. **Tables 3-16 through 3-18** list the well identification, location, monitoring frequency, well construction data, measurement years, and number of measurements for the Shallow, Intermediate, and Deep Zone Aquifers, respectively.

This GSP includes 18 existing RMS wells with a potential for additional shallow creek/GDE monitoring wells to be added to the program. The selection rationale for all water level monitoring wells is summarized in **Tables 3-16 through 3-18**.

3.5.1.2. Reduction of Groundwater Storage Monitoring Program

The objectives of the monitoring program to calculate changes in groundwater storage based on annual groundwater pumping in the EBP Subbasin include:

- Improve the understanding of applied water rates for large, irrigated parcels (e.g., parks, golf courses, cemeteries) using groundwater as a source of supply
- Improve the understanding of industrial water user locations and the amount of groundwater use
- Improve the understanding of groundwater use for residential irrigation
- Continue metering of groundwater extraction by the GSAs

Because changes in groundwater storage are dependent on changes in the amount of groundwater pumping, this GSP evaluates groundwater storage reduction based on total annual groundwater pumping, as described previously in this section. Due to the potential for seawater intrusion in a coastal margin aquifer like the EBP Subbasin, evaluation of total annual pumping will be used to assess when an undesirable result may occur due to GSA potential future water supply development opportunities. The RMS wells and regional monitoring networks will also be used for monitoring changes in groundwater levels and storage in accordance with Annual Report requirements.

The GSAs will follow up on previous outreach work with well owners, asking about wells and the amount of groundwater pumping they do for irrigation, industrial, and domestic uses. This outreach may include talking with selected well owners to potentially install meters to confirm existing estimates of applied water use for large irrigated parcels and industrial facilities. Other methods (e.g., remote sensing) may also be considered for the estimation of pumping volumes and consumptive use to further refine the overall understanding of current and future pumping in the EBP Subbasin. The GSAs may consider a mailer insert or other outreach to residents asking for information on backyard irrigation wells and water use; possibly followed up by some outreach/interviews with residents in areas of known dense clusters of historical domestic well use (e.g., San Leandro). In addition, future GSP meetings could include discussions of this topic and requests for input from attendees on their groundwater use.

Table 3-16. Summary of Shallow Aquifer Zone Groundwater Level RMS Monitoring Network Wells

Well I.D.	Latitude	Longitude	Minimum Frequency	First Year Data	Last Year Data	Years Measured	Number of Measurements	Selection Rationale
MW-5S	37.67622	-122.152	Spring/Fall	2009	2026	17	61	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
MW-9S	37.68652	-122.113	Spring/Fall	2014	2026	12	49	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
MW-10S	37.68861	-122.162	Spring/Fall	2012	2026	14	50	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
S2-MWS1	37.75669	-122.214	Spring/Fall	2022	2026	4	15	EBMUD well; known well construction; spatial/vertical distribution
S2-MWS2	37.75669	-122.214	Spring/Fall	2022	2026	4	15	EBMUD well; known well construction; spatial/vertical distribution
MW-N3S	37.875315	-122.304343	Spring/Fall	2025	2026	1	3	EBMUD well; known well construction; spatial/vertical distribution

Table 3-17. Summary of Intermediate Aquifer Zone Groundwater Level RMS Monitoring Network Wells

Well I.D.	Latitude	Longitude	Minimum Frequency	First Year Data	Last Year Data	Years Measured	Number of Measurements	Selection Rationale
MW-5I	37.67622	-122.152	Spring/Fall	2009	2026	12	60	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
MW-9I	37.68652	-122.113	Spring/Fall	2014	2026	7	49	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
MW-9D	37.68652	-122.113	Spring/Fall	2009	2026	12	60	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
MW-10I	37.68861	-122.162	Spring/Fall	2011	2026	10	50	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
MW-N1I	37.96282	-122.332	Spring/Fall	2025	2025	1	3	EBMUD well; known well construction; spatial/vertical distribution
MW-S2I	37.62454	-122.073	Spring/Fall	2025	2025	1	4	Hayward well; known well construction; spatial/vertical distribution

Table 3-18. Summary of Deep Aquifer Zone Groundwater Level RMS Monitoring Network Wells

Well I.D.	Latitude	Longitude	Minimum Frequency	First Year Data	Last Year Data	Years Measured	Number of Measurements	Selection Rationale
MW-5D	37.67622	-122.152	Spring/Fall	2009	2026	17	55	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
MW-8D	37.71761	-122.183	Spring/Fall	2012	2026	14	50	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
MW-10D	37.68861	-122.162	Spring/Fall	2009	2026	17	60	EBMUD well; known well construction; recent history of WL data; spatial/vertical distribution
S2-MWD1	37.75688	-122.214	Spring/Fall	2022	2026	4	15	EBMUD well; known well construction; spatial/vertical distribution
Well D	37.65332	-122.114	Spring/Fall	1996	2025	29	435	Hayward well; known well construction; spatial/vertical distribution
Well E	37.6188	-122.097	Spring/Fall	1999	2025	26	19	Hayward well; known well construction; spatial/vertical distribution

3.5.1.3. Seawater Intrusion Monitoring Program

Seawater intrusion monitoring wells are summarized in **Table 3-19**. The objectives of the monitoring program to calculate changes in seawater intrusion include:

- Sample RMS designated as sentinel wells for chloride for shallow, intermediate, and deep aquifer zones
- Compare collected chloride sample data against SMCs and baseline conditions

Having sentinel monitoring wells distributed across the subbasin and all three aquifer zones will prevent seawater intrusion into the Subbasin. Due to their locations within the Subbasin, the sentinel wells will provide an early warning system for seawater intrusion. This GSP adopts chloride concentrations in sentinel wells as the metric for assessing seawater intrusion, as described previously in this GSP. The wells selected for monitoring seawater intrusion are located within the shallow, intermediate, and deep aquifer zones. For all aquifer zones, these wells are located near the western and southern boundaries of the subbasin where seawater intrusion is most likely to be detected. Because the shallow aquifer zone has a connection to the San Francisco Bay, monitoring wells for this aquifer zone span the entirety of the Subbasin. The deep aquifer zone only occurs in the southern portion of the Subbasin. Thus, the monitoring wells for this aquifer zone are located in the southern half of the Subbasin. The placement of monitoring wells in the intermediate and deep zones also reflects where most of the pumping occurs under current and/or possible future conditions.

3.5.1.4. Land Subsidence Monitoring Program

The objectives of the monitoring program to calculate changes in land subsidence include:

- Monitor vertical displacement of the land surface to improve the understanding of the potential occurrence of land subsidence
- Review extensometer data collected by the USGS at a station near the former EBMUD Bayside well to improve the understanding of the potential occurrence of subsidence
- Review periodic subsidence surveys that may be conducted by others

The land subsidence sustainability indicator will be evaluated by reviewing the InSAR satellite data provided by DWR. The InSAR dataset represents measurements of vertical ground surface displacement and is reported at a monthly time step with quarterly dataset updates. The InSAR dataset has a reported vertical accuracy of 21 mm or 0.07 feet (Towill, 2026). The land subsidence sustainability indicator will be evaluated on an annual basis using the October 1 measurement. InSAR data will be extracted at each groundwater level RMS location to compare with SMC (**Figure 3-8**).

The land subsidence sustainability indicator will also be evaluated by an annual review of extensometer data and other subsidence surveys that may be conducted.

Table 3-19. Summary of Seawater Intrusion RMS Monitoring Network Wells

Well I.D.	Aquifer	Latitude	Longitude	Minimum Frequency	First Year Data	Last Year Data	Years Measured	Number of Measurements	Selection Rationale
MW-5C (Port of Oakland)	Shallow	37.80820	-122.31371	Spring/Fall	NA	NA	NA	NA	
MW-5D	Deep	37.67612	-122.15186	Spring/Fall	2014	2025	11	15	EBMUD well, spatial/vertical distribution, western location
USGS_37400 4 122092105	Shallow	37.66782	-122.15585	Spring/Fall	2007	2007	1	1	EBMUD well, spatial/vertical distribution, western location
USGS_37400 4 122092104	Intermediate	37.66782	-122.15585	Spring/Fall	2007	2007	1	1	EBMUD well, spatial/vertical distribution, western location
MW-3C (Port of Oakland)	Intermediate	37.84745	-122.28673	Spring/Fall	NA	NA	NA	NA	EBMUD well, spatial/vertical distribution, western location
MW-10S	Shallow	37.68609	-122.16051	Spring/Fall	2022	2025	4	5	EBMUD well, spatial/vertical distribution, western location
MW-10I	Intermediate	37.68609	-122.16051	Spring/Fall	2022	2025	4	5	EBMUD well, spatial/vertical distribution, western location
MW-10D	Deep	37.68609	-122.16051	Spring/Fall	2022	2025	4	5	EBMUD well, spatial/vertical distribution, western location

Table 3-19. Summary of Seawater Intrusion RMS Monitoring Network Wells

Well I.D.	Aquifer	Latitude	Longitude	Minimum Frequency	First Year Data	Last Year Data	Years Measured	Number of Measurements	Selection Rationale
S2-MWS2	Shallow	37.75668	-122.21368	Spring/Fall	2022	2025	4	5	EBMUD well, spatial/vertical distribution, western location
S2-MWD1	Deep	37.75687	-122.21353	Spring/Fall	2023	2025	3	4	EBMUD well, spatial/vertical distribution, western location
MW-N3S	Shallow	37.87545	-122.30461	Spring/Fall	2025	2025	1	1	EBMUD well, spatial/vertical distribution, western location
MW-B-Shallow	Shallow	37.61724	-122.08943	Spring/Fall	1991	1991	1	1	Hayward well, spatial/vertical distribution, western location
MW-B-Intermediate	Intermediate	37.61724	-122.08943	Spring/Fall	1991	1991	1	1	Hayward well, spatial/vertical distribution, western location
Well E	Deep	37.61887	-122.09740	Spring/Fall	NA	NA	NA	NA	Hayward well, spatial/vertical distribution, western location

NA = no data available

3.5.1.5. Groundwater Quality Monitoring Program

The sustainability indicator for degraded water quality is evaluated by monitoring groundwater quality at a network of RMS wells. The objectives of the groundwater quality monitoring program for the EBP Subbasin include the following as they relate to overall groundwater basin extraction:

- Evaluate baseline groundwater quality conditions in the various areas of the Subbasin, and identify spatial differences in water quality between areas and vertically in the aquifer system
- Ongoing monitoring of concentrations of key constituents of interest as represented by nitrate, arsenic, chloride, and TDS
- Assess the changes and trends in groundwater quality
- Identify the natural and anthropogenic factors that lead to changes in water quality

For monitoring groundwater quality conditions and potential impacts from overall groundwater basin extraction, a network of RMS wells has been selected from among existing and recently installed monitoring wells located throughout the EBP Subbasin and screened in the various aquifer zones. The RMS wells for groundwater quality monitoring will be sampled and analyzed by the EBP Subbasin GSAs. The selected RMS wells for groundwater quality are listed in **Table 3-20** and shown on **Figure 3-9**. Information on historical groundwater quality monitoring for each of these wells is included in **Appendix 3.E**.

Organic chemical (e.g., solvents such as trichloroethylene (TCE) and perchloroethylene (PCE); fuel hydrocarbons) contaminant plumes tend to occur in the upper portion of the Shallow Aquifer Zone in EBP Subbasin. It is not anticipated that these contaminant plumes will interact with or be affected by GSA potential future water supply development opportunities that utilize the Intermediate and Deep Aquifer Zones due to impedance of vertical flow through intervening clay layers between the Shallow Aquifer Zone and deeper zones. However, the development of potential future water supply development opportunities will include evaluation of potential contaminant plumes that may be near the project site as part of the overall project feasibility study.

The network of groundwater quality RMS wells includes 17 existing wells that are also part of the water level monitoring indicator well network and will be sampled for groundwater quality by the EBP Subbasin GSAs. As details of GSP potential future water supply development opportunities are refined, the groundwater quality monitoring network will be reviewed and modified if needed to ensure that the network is sufficient to monitor groundwater quality conditions and avoid impacts (or plume migration) that may potentially be caused by GSP projects and MA. Groundwater quality impacts from activities unrelated to potential future water supply development opportunities or overall groundwater basin extraction are subject to oversight by other regulatory programs overseeing waste discharges to groundwater and groundwater contamination sites.

Table 3-20. Summary of Groundwater Quality RMS Monitoring Network Wells, Constituents, and Measurement Frequency																		
Well ID	Aquifer Zone	Monitoring Entity	Field Measurements					Laboratory Measurements										
			Specific Conductance	pH	Dissolved Oxygen	Oxygen Reduction Potential	Temperature	Nitrate (as nitrogen)	Arsenic	Total dissolved solids (TDS)	Carbonate	Bicarbonate	Chloride	Sulfate	Calcium	Sodium	Magnesium	Potassium
MW-5S	Shallow and Intermediate	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-5I	Intermediate	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-5D	Deep	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-9S	Shallow	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-9I	Intermediate	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-9D	Intermediate	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-10S	Shallow	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-10I	Intermediate	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-10D	Deep	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
S2-MWS1	Shallow	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
S2-MWS2	Shallow	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
S2-MWD1	Deep	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-N1I	Intermediate	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-N3S	Shallow	EBMUD	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
MW-S2I	Intermediate	Hayward	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
Well D	Deep	Hayward	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year
Well E	Deep	Hayward	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	5-Year	5-Year	Annual	5-Year	5-Year	5-Year	5-Year	5-Year

3.5.1.6. Depletion of Interconnected Surface Water Monitoring Program

The objectives of the monitoring program to evaluate depletion of interconnected surface water include:

- Install wells and monitor groundwater levels in the Water Table Aquifer Zone near major creeks
- Collect additional streamflow data under different flow conditions using a combination of synoptic stream surveys (i.e., collection of streamflow measurements at multiple locations along a creek on the same day) and stream gauges
- Review shallow groundwater levels and streamflow data to characterize stream aquifer connection along major creeks
- Monitor shallow groundwater levels along streams to ensure groundwater levels remain above the MT for the depletion of interconnected surface water

Because of the dependence of depletion of interconnected surface water on shallow groundwater levels and the difficulty of accurately quantifying depletion of interconnected surface water from streamflow data (due to variability in streamflow caused by variable climatic conditions, reservoir releases, and other factors), this GSP adopts shallow groundwater levels along major creeks as a proxy for assessing depletion of interconnected surface water, as described previously in this GSP. The wells selected for monitoring the depletion of interconnected surface water will be the Water Table Aquifer Zone (i.e., upper 50 feet of sediments) wells to be installed early in GSP implementation to fill data gaps. **Figure 3-11** illustrates the approximate locations of the shallow wells being considered for monitoring of groundwater levels for depletion of interconnected surface water. Final well locations may vary due to site logistics and further study regarding optimum well locations. These proposed shallow wells are expected to be up to 50 feet deep, but they could be significantly shallower depending on lithology and groundwater levels encountered during drilling at each location. The selection process and rationale for selection are based on better characterizing the primary creeks in the EBP Subbasin, with priority assigned to San Pablo Creek and San Leandro Creek, which have two of the largest contributing watersheds to EBP Subbasin. Secondary creeks being considered are Wildcat Creek, Codornices Creek, and San Lorenzo Creek. Wildcat Creek flows very close to San Pablo Creek in the main part of the EBP Subbasin in the Richmond area and is likely well represented by overall conditions along San Pablo Creek. Codornices Creek has one of the smaller watersheds tributary to the EBP Subbasin, but it is representative of a creek that has been targeted for restoration activities. San Lorenzo Creek is mostly concrete-lined from the eastern EBP Subbasin boundary until it reaches about 0.75 miles from the Bay margin; therefore, it was deemed secondary in importance for stream-aquifer connection compared to San Leandro Creek (which is unlined over a greater length), even though the San Lorenzo Creek watershed is one of the major watersheds tributary to the EBP Subbasin.

3.5.2. Monitoring Protocols for Data Collection and Monitoring (CCR Title 23, Section 352.2)

This section provides a description of technical standards, methods, and procedures/protocols to ensure comparable data and methodologies for data collection and monitoring. All field monitoring activities will

follow established monitoring protocols for the EBP Subbasin that reflect the standards, methods, and procedures described below.

3.5.2.1. Groundwater Level Monitoring Program

The MT and MO for the chronic lowering of groundwater levels sustainability indicator are evaluated by monitoring groundwater levels. The SGMA regulations require a network of monitoring wells sufficient to demonstrate groundwater occurrence, flow direction, and hydraulic gradients between principal aquifers and surface water features. The overall monitoring network for groundwater levels is provided in **Table 3-3**, **Figure 3-1**, and supplemental wells are listed in **Appendix 3.G**.

The protocols for measuring groundwater levels include:

- Measure depth to water in the well using procedures appropriate for the measuring device. Equipment must be operated and maintained in accordance with the manufacturer's instructions. Groundwater levels should be measured to the nearest 0.01 foot (or at least to the nearest 0.1 foot at a minimum) relative to the Reference Point (RP). Measurements and RPs should not be recorded in feet and inches.
- For measuring wells that are under pressure, allow a period of time for the groundwater levels to stabilize. In these cases, multiple measurements should be collected to ensure the well has reached equilibrium, such that no significant changes in water level are observed. Every effort should be made to ensure that a representative stable depth to groundwater is recorded. If a well does not stabilize, the quality of the value should be appropriately qualified as a questionable measurement. If a well is artesian, site-specific procedures should be developed to collect accurate information and be protective of safety conditions associated with a pressurized well. In many cases, an extension pipe may be adequate to stabilize the head in the well. Record the dimensions of the extension and document measurements and configuration.
- The groundwater elevation should be calculated using the following equation:
$$\text{GWE} = \text{RPE} - \text{DTW}$$

Where:
GWE = Groundwater Elevation in NAVD88 datum
RPE = Reference Point Elevation in NAVD88 datum
DTW = Depth to Water
- The well caps or plugs should be secured following a depth to water measurement.
- Groundwater level measurements are to be made on a semi-annual basis at a minimum during periods that will capture seasonal highs and lows.
- The sampler should record the well identifier, date, time (24-hour format), RPE, height of RP above or below ground surface, DTW, GWE, and comments regarding any factors that may influence the depth to water readings, such as weather, nearby pumping, flooding, or well condition. Of particular concern may be pumping of nearby supply wells or the time since pumping stopped in the well being monitored (if it is a production well); such conditions should be specifically identified and noted to the extent possible. If there is a questionable measurement

or the measurement cannot be obtained, it should be noted. Standardized field forms will be used for all data collection.

- Wells containing groundwater with high salinity may occur in the shallow sediments (i.e., upper 50 to 80 feet) along the San Francisco Bay margin. Certain water level measurement devices (e.g., electronic sounder) may provide anomalous readings, and levels should be measured multiple times to ensure a consistent depth to water is recorded. After each measurement attempt, the probe should be retrieved and rinsed with fresh water and then reinserted into the well to confirm the measurement. It is recommended that at least three attempts occur, and the same reading should be recorded to ensure accurate measurement in saline groundwater conditions.
- The sampler should have a record of previous measurements in the field for each well to compare with the current measurements being recorded. If a current measurement appears anomalous compared to previous measurements, it should be rechecked and verified.
- All data should be entered into the GSP data management system (DMS) as soon as possible. Care should be taken to avoid data entry mistakes, and the entries should be checked by a second person.

3.5.2.2. Installing Pressure Transducers and Downloading Data

The procedures below should be followed for the installation of a pressure transducer and periodic data downloads:

- The sampler must use an electronic sounder or chalked steel tape and follow the protocols listed above to measure the groundwater level and calculate the groundwater elevation in the monitoring well to properly program and reference the installation. It is recommended that transducers record the measured groundwater level to conserve data capacity; groundwater elevations can be calculated later after downloading.
- The sampler must note the well identifier, the associated transducer serial number, transducer range, transducer accuracy, and cable serial number.
- Transducers must be able to record groundwater levels with an accuracy of at least 0.1 feet. Professional judgment will be exercised to ensure that the data being collected is meeting the data quality objectives (DQO) and that the instrument is capable of meeting DQO. Battery life, data storage capacity, range of groundwater level fluctuations, and natural pressure drift of the transducers should be included in the evaluation.
- The sampler must note whether the pressure transducer uses a vented or non-vented cable for barometric compensation. Non-vented units are preferred (generally less expensive, require less maintenance than vented units, and are less prone to failure) and provide accurate data if properly corrected for natural barometric pressure changes. This requires the consistent logging of barometric pressures by GSAs to coincide with measurement intervals.
 - Follow manufacturer specifications for installation, calibration, data logging intervals, battery life, correction procedure (if non-vented cables are used), and anticipated life expectancy to assure that DQOs are being met for the GSP.

- Secure the cable to the well head with a well dock or another reliable method. Mark the cable at the elevation of the reference point with tape or an indelible marker. This will allow estimates of future cable slippage.

The transducer data should be periodically checked against hand-measured groundwater levels to monitor electronic drift or cable movement. This should happen during routine site visits, at least annually, to maintain data integrity. The data should be downloaded as necessary to ensure no data is lost and entered into the DMS following the QA/QC program established for the GSP. Data collected with non-vented data logger cables should be corrected for atmospheric barometric pressure changes, as appropriate. After the sampler is confident that the transducer data have been safely downloaded and stored, the data should be deleted from the data logger to ensure that adequate data logger memory remains.

3.5.2.3. Groundwater Storage Reduction Monitoring Program

The monitoring protocols for evaluating change in groundwater storage are related to the quantification of groundwater pumping. To the extent that flow meters may be used on representative irrigation or industrial wells (in addition to GSA municipal production wells) to quantify groundwater pumping volumes from a well, the following procedures should be followed for the installation of a meter and reporting of meter reads:

- The person collecting meter reads must note the well identifier, the meter brand and model number, and the meter location relative to bends in piping, both up- and downstream of the meter location.
- Meters should be able to record groundwater volumes to a precision of at least 100 gallons. Professional judgment will be exercised to ensure that the data being collected meets the data quality objectives (DQO) and that the instrument is capable of meeting DQO.
- Follow manufacturer specifications for installation, calibration, recording data, and correction procedure (if meter is found to be insufficiently calibrated) to assure that DQOs are being met for the GSP.

3.5.2.4. Seawater Intrusion Monitoring Program

The monitoring protocols for evaluating seawater intrusion are similar to the protocols described below for groundwater quality. Monitoring for seawater intrusion involves sampling sentinel wells for chloride. This sampling will be coordinated with the groundwater quality sampling.

3.5.2.5. Land Subsidence Monitoring Program

Subsidence monitoring will include the following protocols:

- Obtain and review InSAR subsidence data distributed by DWR. This data will be input into the DMS following QA/QC.
- Obtain and review extensometer subsidence data collected by the USGS. This data will be input into the DMS following QA/QC.

- Obtain and review subsidence survey data that may be collected by others. This data will be input into the DMS following QA/QC.

3.5.2.6. Groundwater Quality Monitoring Program

Annual monitoring of groundwater quality will include sampling and laboratory analysis of key parameters of interest, as indicated in **Table 3-20**, to be conducted by GSAs as presented in **Tables 3-6, 3-12, and 3-13**. Water quality parameters may be added to the groundwater quality monitoring program in the future, if appropriate. During sampling events, measurement of select water quality parameters will take place in the field. These field parameters should be measured at an annual frequency and include electrical conductivity (EC) in $\mu\text{S}/\text{cm}$, pH, temperature (in $^{\circ}\text{C}$), redox, and dissolved oxygen (DO) in mg/L . The annual testing is summarized in **Table 3-20**.

The GSP monitoring program will utilize the following protocols for collecting groundwater quality samples:

- Prior to sampling, the analytical laboratory will be contacted to schedule laboratory time, obtain appropriate sample containers, and clarify any sample holding times or sample preservation requirements.
- Each well used for groundwater quality monitoring will have a unique identifier. This identifier will appear on the well housing or the well casing to verify well identification.
- In the case of wells with dedicated pumps, samples should be collected at or near the wellhead following purging.
- Prior to sampling, the sampling port and sampling equipment will be cleaned of any contaminants. The equipment will be decontaminated after purging and collection of water samples at each site to avoid any cross-contamination between wells.
- The groundwater elevation in the well should be measured following the appropriate protocols described above in the groundwater level measuring protocols.
- For any well not equipped with low-flow or passive sampling equipment, an adequate volume of water should be purged from the well to ensure that the groundwater sample is representative of ambient groundwater and not stagnant water in the well casing. Purging three well casing volumes is generally considered adequate. Professional judgment should be used to determine the proper configuration of the sampling equipment with respect to well construction such that a representative ambient groundwater sample is collected. If pumping causes a well to be evacuated (go dry), document the condition and allow the well to recover to within 90% of the original level prior to sampling.
- Field parameters of pH, electrical conductivity, temperature, and turbidity should be collected periodically during purging and prior to the collection of each sample. Field parameters should be evaluated during the purging of the well and should stabilize prior to the collection of the water sampling. Measurements of pH values should occur in the field since the short hold times for laboratory pH analysis are typically unachievable. Other parameters, such as oxidation-reduction potential (ORP), dissolved oxygen (DO) (in situ measurements preferable), or turbidity, may also be

useful for assessing purge conditions. All field instruments should be calibrated daily and evaluated for drift throughout the day.

- Sample containers should be labeled prior to sample collection. The sample label must include sample ID (often well ID), sample date and time, sample personnel, sample location, preservative used (if any), and analytes and analytical method(s).
- Samples should be collected under laminar flow conditions. This may require reducing pumping rates prior to sample collection. Alternatively, the flow rate from the sampling tap should correspond to laminar flow conditions when possible.
- All samples requiring preservation must be preserved as soon as practically possible, ideally at the time of sample collection. Ensure that samples are appropriately filtered as recommended for the specific analyte. Entrained solids can be dissolved by the preservative, leading to inconsistent results of dissolved analytes. Specifically, samples to be analyzed for metals should be field filtered prior to preservation; do not collect an unfiltered sample in a preserved container.
- Samples should be chilled and maintained at 4 °C to prevent degradation of the sample. The laboratory's Quality Assurance Management Plan should detail appropriate chilling and shipping requirements.
- Samples must be shipped under chain of custody documentation to the appropriate laboratory promptly to avoid violating holding time restrictions.
- Ensure the laboratory uses appropriate reporting limits that are at or below levels needed for the objectives of the monitoring.
- Groundwater quality samples are to be collected annually for key constituents and every five years for all other constituents.
- For wells monitored by other entities, obtain results and associated information on sampling activities through coordination and communication directly with the monitoring entity or through public databases such as SWRCB GeoTracker, where these data are available.

All groundwater quality data and other information from sampling activities should be entered into the DMS as soon as possible and in accordance with established QA/QC procedures. Care should be taken during any data entry to avoid mistakes, and data entered into the database should be checked for accuracy and completeness.

3.5.2.7. Depletion of Interconnected Surface Water Monitoring Program

Stream depletion monitoring will include the following protocols:

- Obtain and review stream discharge data collected by various parties (e.g., USGS, Alameda County, EBMUD reservoir releases). This data will be input into the DMS following QA/QC.
- Obtain and review stream discharge data from synoptic studies and/or stream gauges conducted/installed by GSAs for GSP implementation. This data will be input into the DMS following QA/QC.

- Groundwater level data collected as part of the stream depletion monitoring program will follow the same protocols as described above for groundwater level monitoring.

3.5.2.8. GDE Monitoring Program

The GDE monitoring program will include monitoring of groundwater levels and biological monitoring. Groundwater level monitoring being conducted for the overall GSP will include new shallow monitoring wells adjacent to selected potential GDE units. Baseline biological monitoring will be conducted within the initial five years of GSP implementation and will be conducted every five years thereafter to document the ecological condition of the potential GDE units. Biological data will be analyzed in conjunction with hydrological data to assess potential ecological effects related to changes in groundwater levels and the relative degree of influence on GDE conditions exerted by streamflow (if the potential GDE unit is adjacent to a creek) and groundwater levels associated with the GDE.

3.5.3. Representative Monitoring

(CCR Title 23, Section 354.36)

This section is intended to provide the following:

- Description of representative sites
- Demonstration of the adequacy of using groundwater elevations as a proxy for other sustainability indicators
- Adequate evidence demonstrating representative monitoring sites reflect general conditions in the area

Groundwater level data are collected from a large network of EBMUD and Hayward wells (**Table 3-3, Figure 3-1, and Appendix 3.G**). Representative monitoring sites are defined in the SGMA regulations as a subset of monitoring sites that are representative of conditions in the Subbasin. Existing wells available for use as RMS sites are primarily located in the southern EBP Subbasin due to a greater thickness of unconsolidated alluvium (and presence of all three aquifer zones) and greater well capacity production potential in this area compared to the northern EBP Subbasin (Deep Aquifer Zone generally not present, and Intermediate Aquifer Zone also not present in many areas). Overall, the initial RMS network provided in this GSP makes best use of existing wells, including three additional monitoring wells installed in 2025. The monitoring network will continue to be evaluated during GSP implementation, and additional RMS wells may be added if deemed necessary. Groundwater level monitoring will be used to assist in monitoring subsidence and stream depletion.

In terms of subsidence, significant impacts to infrastructure are not known to have occurred during a time of much greater pumping in the EBP Subbasin and associated historical low groundwater levels in the 1950s and 1960s. Thus, representative Shallow, Intermediate, and Deep Aquifer Zone monitoring wells are included in the RMS network with MT based on InSAR data. There is also ongoing extensometer monitoring near the former EBMUD Bayside Well to further evaluate the relationship between groundwater levels and subsidence.

Field data (e.g., stream discharge, shallow groundwater levels near streams) are very limited for the EBP Subbasin. However, it is apparent that there is some connectivity between creeks and shallow groundwater, especially in the western to central portion of the EBP Subbasin. Significant additional work is planned to better characterize the major creeks (e.g., San Pablo Creek, San Leandro Creek) in terms of stream-aquifer connectivity, gaining and losing reaches, and typical baseflows. Even if a good historical record of streamflow were available, it is very difficult to determine if streamflow depletion is occurring related to groundwater pumping. However, establishing the relationship between shallow groundwater levels and depletion of interconnected surface water using a combination of field data (shallow monitoring wells, stream discharge data) and groundwater modeling can allow for the relationship between shallow groundwater levels and surface water depletion to be established. In this manner, the change in shallow groundwater levels from baseline conditions can provide a reasonable proxy for the measurement of depletion of interconnected surface water.

The RMS wells included in this GSP will provide adequate monitoring to reflect general conditions in the EBP Subbasin. Data collected and scientific analyses conducted during the GSP implementation period will be used to inform and guide plans for any additional groundwater development by the GSAs. This data collection and analysis allows time to assess and improve monitoring networks and collect sufficient background/baseline data under current basin conditions and for future evaluation of potential impacts, should additional development of groundwater resources in the EBP Subbasin occur.

3.5.4. Review and Evaluation of the Monitoring Network ***(CCR Title 23, 354.38)***

Per Section 354.38 of the GSP Regulations, this section of the GSP is intended to provide the following:

- Review and evaluation of the monitoring network
- Identification and description of data gaps
- Description of steps to fill data gaps
- Description of monitoring frequency and density of sites

Development of this GSP included extensive review and documentation of historical data, evaluation of currently available monitoring facilities, and identification of data gaps for various data types (**Appendix 2.A**). This data gaps analysis demonstrated that historical data and currently available monitoring facilities are very limited in the northern EBP Subbasin. The southern EBP Subbasin has significantly more historical data and available monitoring facilities, but significant data gaps still remain. The results of this study were used as the basis for the DWR Proposition 68 grant application that was approved/awarded to begin filling these data gaps. Through the Proposition 68 grant, three single-completion wells were installed in 2025. Two of these wells are located in the north and one in the south.

The grant also provided funding for the evaluation of streamflow and stream chemistry (isotopes) along San Pablo and San Leandro Creeks. This work was completed in August 2023.

A major data gap area throughout the EBP Subbasin is the understanding of stream-aquifer interconnection and potential for stream depletion from groundwater pumping. The Proposition 68 grant cited above provides some additional information, but more work has been identified to address this data gap.

The monitoring networks described above for each of the applicable sustainability indicators will be evaluated on a yearly basis. This evaluation will involve a review of the described MT and MO and their comparison to observed trends in the networks. Furthermore, a more comprehensive review of the monitoring networks will be conducted every five years. During this review, implementation actions and potential future water supply development opportunities will be evaluated, and the monitoring networks will be assessed for their efficacy in tracking progress. These evaluations and assessments will also highlight any additional data gaps and recommended changes to the monitoring networks.

3.5.4.1. Identification and Description of Data Gaps

Identification and description of data gaps for the monitoring networks described above for each of the applicable sustainability indicators are summarized below.

3.5.4.2. Groundwater Elevation

Groundwater elevation data have been collected within the EBP Subbasin over the past several decades from various sources, including DWR, Alameda County, EBMUD, Hayward, USGS, and others. However, despite these data collection efforts, temporal data gaps still exist. Specifically, the northern portion of the EBP Subbasin and portions of the southern EBP Subbasin are lacking in historical data. Historical data are available from the early 1960s to 2000 for several wells previously monitored by Alameda County and DWR. Some groundwater elevation data from the 1990s to more recent years are available from Hayward wells. The Bayside Well monitoring network has provided significant data since 2010 in the southern EBP Subbasin. Temporal data gaps will begin to be filled by more regular collection of data as part of the GSP, together with the installation of transducers in new monitoring wells.

The current groundwater level monitoring network was reassessed to determine whether the current network, including the three newly installed wells, provides sufficient monitoring coverage. The DWR *Monitoring Networks and Identification of Data Gaps BMP* (DWR, 2016) was used to guide the assessment. To evaluate whether the current network provides appropriate monitoring well density across the three aquifers, the guidelines presented in Table 1 (**Table 3-21**) of the BMP were applied.

Table 3-21. Monitoring Well Density Considerations	
Reference	Monitoring Well Density (wells per 100 square miles)
Heath (1976)	0.2-10
Sophocleous (1983)	6.3
Hopkins (1984) Basins pumping more than 10,000 acre-feet/year per 100 square miles	4.0
Basins pumping between 1,000 and 10,000 acre-feet/year per 100 square miles	2.0
Basins pumping between 250 and 1,000 acre-feet/year per 100 square miles	1.0
Basins pumping between 100 and 250 acre-feet/year per 100 square miles	0.7

Source: DWR, 2016

The recommended monitoring well density was calculated using the requirements provided by Hopkins (1984). The groundwater model was used to estimate the average pumping by aquifer. **Table 3-22** summarizes the calculated recommended number of monitoring wells by aquifer. Based on these calculations, two monitoring wells are recommended for the shallow aquifer, zero for the intermediate aquifer, and two for the deep aquifer. Although the calculations indicated zero monitoring wells for the intermediate aquifer, one well was still recommended because the pumping value is near the lowest threshold specified in **Table 3-21** (100 acre-feet per year per 100 square miles). These recommended well counts reflect the estimated pumping volume for each aquifer.

Table 3-22. Recommended Monitoring Wells by Aquifer						
Aquifer	Subbasin Size	Size/100 mi ²	Pumping (AF/yr)	Pumping per 100 mi ²	Well Density (well/100 mi ²)	Recommended Number of Monitoring Wells
Shallow	111	1.1	1284	1152	2	2
Intermediate		1.1	88	79	0	1
Deep		1.1	2261	2029	2	2

AFY = acre-feet per year; sq mi = square miles

To assess the adequacy of the monitoring network, the existing number of monitoring wells in each aquifer was compared with the recommended number of wells. This comparison is summarized in **Table 3-23**. The shallow aquifer currently includes 6 monitoring wells, compared with the recommended 2 wells, and the deep aquifer includes 6 monitoring wells, compared with the recommended 2 wells. The

intermediate aquifer includes 6 monitoring wells, compared with the recommended 0 wells. These wells are spatially distributed across the aquifers.

Table 3-23. Existing Monitoring Wells Compared to Recommended			
Aquifer	Recommended Number of Monitoring Wells	Current Number of Monitoring Wells	New Monitoring Wells Drilled
Shallow	2	10	2
Intermediate	1	9	1
Deep	2	8	0

Based on this assessment, the current monitoring network for each aquifer includes a sufficient number of wells to monitor groundwater levels across the subbasin. Although no gaps in coverage were identified at this time, the GSA will continue to evaluate the adequacy of the network and update this analysis as needed.

Data gaps relative to GDEs can be characterized as a combination of groundwater levels and biological monitoring. Data gaps related to shallow groundwater levels occur in areas identified as potential GDEs in this GSP, and these will be addressed as cited above with the installation of additional shallow monitoring wells. Biological monitoring, recommended every five years, will be used to evaluate potential beneficial or adverse effects on GDEs that may be related to changes in future groundwater conditions during the Implementation and Sustainability Periods. Baseline biological monitoring will be conducted in the initial five years of GSP implementation, followed by regular biological monitoring at five-year intervals.

3.5.4.3. Groundwater Storage

Resolving groundwater storage data gaps primarily entails developing better estimates of groundwater pumping throughout the Subbasin. The approach to improve groundwater pumping estimates will be further developed during the initial years of GSP implementation, but this may include: metering of selected production wells to better understand applied water rates for irrigation of large parcels and/or industrial sites; use of remote sensing or other technologies/methods to refine estimates of applied water for irrigation; and continued outreach and communication with basin stakeholders and well owners about groundwater use.

3.5.4.4. Seawater Intrusion

As described in previous sections, chloride concentrations within the EBP Subbasin have been relatively stable and low over time. Although the shallow aquifer zone has the only connection to the San Francisco Bay, the monitoring network of sentinel wells currently spans all three aquifer zones (shallow, intermediate, and deep). The shallow aquifer zone is present throughout the EBP Subbasin, whereas the deep aquifer zone is only present in the southern portion of the EBP Subbasin. The deep and intermediate aquifer zone wells are concentrated in the southern half of the EBP Subbasin, where the majority of the pumping occurs under current and/or possible future conditions. The incorporation of RMS in the

intermediate and deep aquifer zones allows the monitoring network to capture any seawater intrusion as a result of pumping. The shallow aquifer zone network spans most of the EBP Subbasin. However, there are currently no sentinel wells in the very northern portion of the EBP Subbasin. The GSA will assess this data gap and determine if a monitoring well is needed in this area.

3.5.4.5. Land Subsidence

There has been no significant subsidence impacting infrastructure in the EBP Subbasin despite extensive and much greater groundwater pumping in the 1950s and 1960s. A key component of monitoring for subsidence is the extensometer station installed by USGS near the former EBMUD Bayside Well. Subsidence data have been collected from this station for over 10 years to help establish background conditions, and data will continue to be collected in the future. If the Bayside Well is replaced and used extensively in the future, the extensometer will provide a detailed record of any elastic and inelastic subsidence that may occur. In addition, extensive monitoring of groundwater levels in and around the extensometer will allow for further understanding of the relationship between groundwater levels and subsidence.

The InSAR dataset used to evaluate land subsidence is continuous across the EBP Subbasin and will be evaluated in relation to SMCs at specific point locations. The subsidence monitoring network is considered to be representative of the EBP Subbasin, and no data gaps are reported.

3.5.4.6. Groundwater Quality

Considerable historical groundwater quality data exist for the EBP Subbasin, although the spatial distribution and well construction details present limitations. Several of the wells in the groundwater quality sustainability indicator monitoring network have not been historically monitored for groundwater quality or have only one measurement for a given constituent. The combination of these existing wells and the monitoring wells recently constructed provides a sufficient initial network for monitoring of groundwater quality and impacts from overall groundwater basin extraction. As GSP potential future water supply development opportunities are implemented and the planned locations for these activities are better known, the groundwater quality monitoring network will be reviewed and modified as needed to provide sufficient groundwater quality monitoring to meet the stated objectives.

3.5.4.7. Depletion of Interconnected Surface Water

The depletion of the interconnected surface water sustainability indicator has the most limited data of all the sustainability indicators in the EBP Subbasin. Data for shallow groundwater levels adjacent to/beneath creeks are generally lacking, as are detailed survey data on creek thalweg elevations along the lengths of major creeks traversing the EBP Subbasin. In addition, stream discharge data are generally lacking for the major creeks. Therefore, a preliminary plan has been developed to fill these data gaps during GSP implementation. Additional details of the overall plan to fill data gaps are described below in more detail and include installation of shallow monitoring wells along major creeks and potential GDE areas and stream gages. A stream-aquifer study was completed in 2023 (see Section 3.5.4.8) that involved conducting synoptic/hydrometric surveys and stream isotope sampling.

Upcoming additional work during GSP implementation includes drilling/installation of up to seven shallow monitoring wells up to 50 feet deep to be located along major creeks and GDEs, and installation of stream gauges to provide for ongoing collection of stream discharge measurements. After collecting data from the future shallow monitoring wells near creeks and the stream gages, the GSAs will evaluate if further synoptic surveys are needed.

3.5.4.8. Description of Steps to Fill Data Gaps

Data gaps have been presented for the six sustainability indicators. Steps to fill data gaps that have been completed include:

In 2025, new monitoring wells were installed at two locations in the northern EBP Subbasin and at one location in the southern EBP Subbasin. These new monitoring wells are included in the list of RMS wells and allow for the collection of water level and water quality data in the Shallow and Intermediate Aquifer Zones in the northern EBP Subbasin, and in the Intermediate Aquifer Zone in the southern EBP Subbasin. These new wells help fill data gaps for the following sustainability indicators: groundwater levels, seawater intrusion, and groundwater quality. The wells also provide key data points for annual calculations of groundwater storage change. Installation of the wells was partially funded under the DWR Proposition 68 grant.

- Synoptic stream surveys were conducted, and stream isotope data were collected in two major creeks (San Pablo and San Leandro) to better characterize stream-aquifer connectivity and interaction. This information improved the overall understanding of key hydrogeologic factors related to the depletion of the interconnected surface water sustainability indicator. This work was completed in 2023 and was partially funded by the DWR Proposition 68 grant.
- To provide baseline ecosystem health data, biological surveys were conducted to characterize species. Additionally, the rooting depths of potential GDE areas were evaluated. This work was completed in 2025.

Several additional steps to fill data gaps have been identified and outlined above and are planned to be conducted during ongoing GSP implementation. These additional steps include:

- Drilling and installation of several shallow monitoring wells along major creeks and, if possible, in potential GDE areas
- Conducting periodic synoptic (hydrometric) stream surveys, if GSAs determine necessary
- Installing additional stream gauges
- Better characterization of overall basin groundwater pumping
- Conducting periodic biological surveys, as needed, to evaluate ecosystem health

In addition to these ongoing studies to fill data gaps, the monitoring networks will be evaluated on a yearly basis with an in-depth review every five years. If additional data gaps arise, the GSAs will consider the

implications of these gaps, associated costs, and importance to the continued implementation of the GSP and take appropriate actions to address the gaps.

3.5.4.9. Description of Monitoring Frequency and Density of Sites

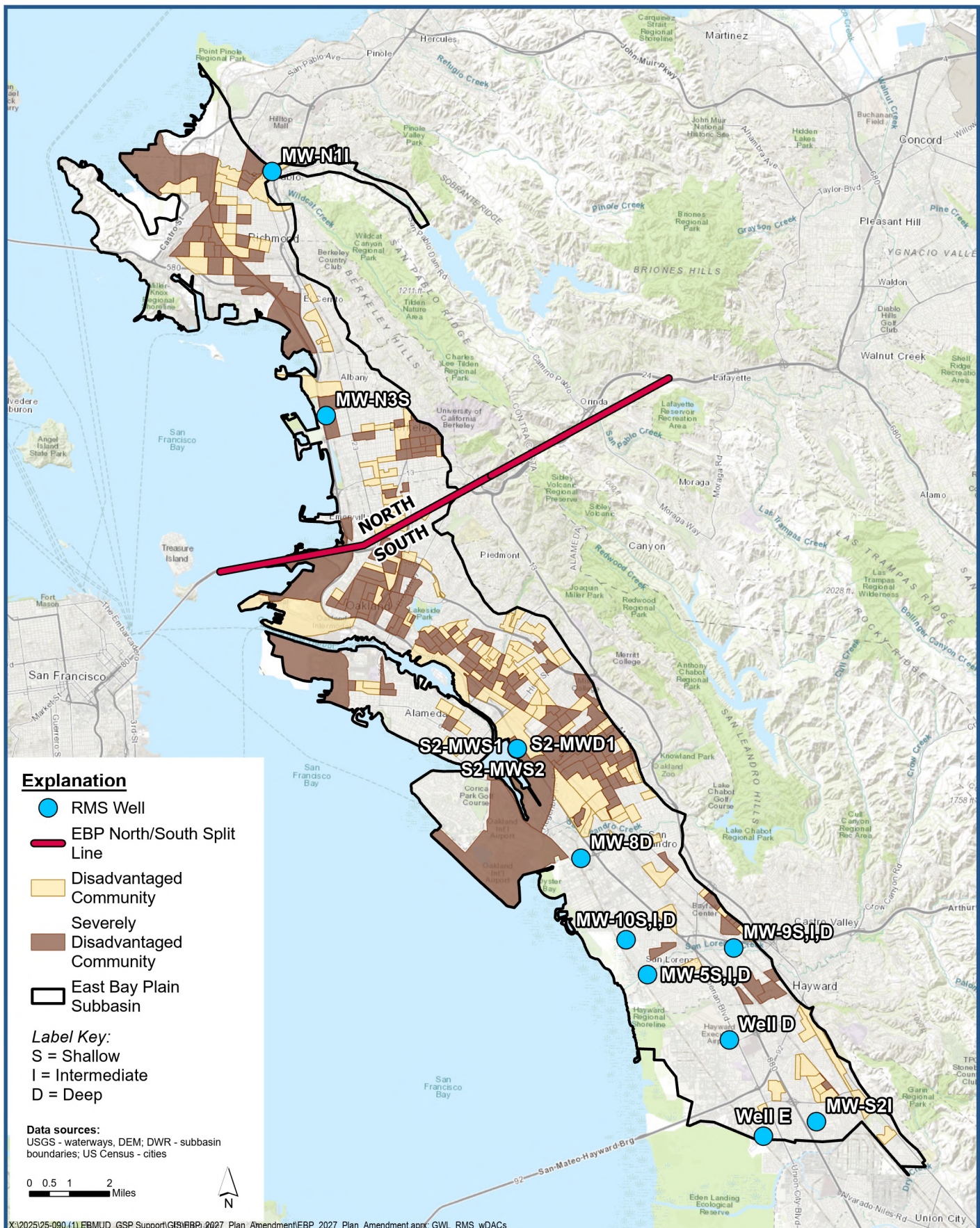
Monitoring frequency and density of sites for all sustainability indicators are described in previous sections of this report.

3.6. References

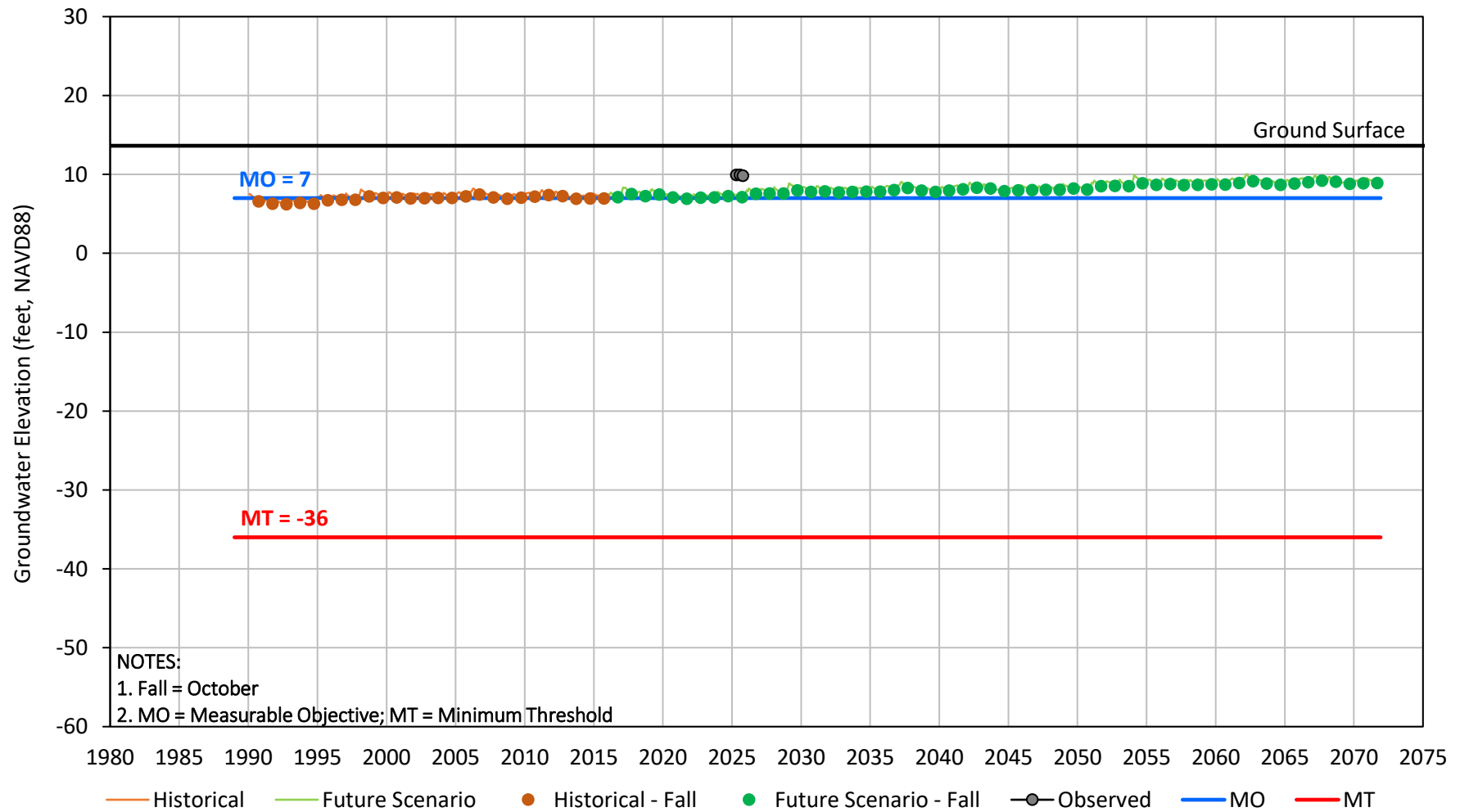
- California Regional Water Quality Control Board, San Francisco Bay Region. 2019. *San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan)*.
- California Department of Water Resources (DWR). *Best Management Practices for the Sustainable Management of Groundwater: Monitoring Networks and Identification of Data Gaps*. Sustainable Groundwater Management Program, December 2016.
- Norfleet Consultants. 1998. *Groundwater Study and Water Supply History of the East Bay Plain, Alameda and Contra Costa Counties, California*. Prepared for The Friends of the San Francisco Estuary.
- Towill, Inc. 2026. *InSAR Data Accuracy for California Groundwater Basins CGPS Data Comparative Analysis, January 2015 to October 2025 - Task Order Report California Department of Water Resources Contract 4600013876 TO#1*.

FIGURES





Well Name: MW-N3S
Aquifer: Shallow

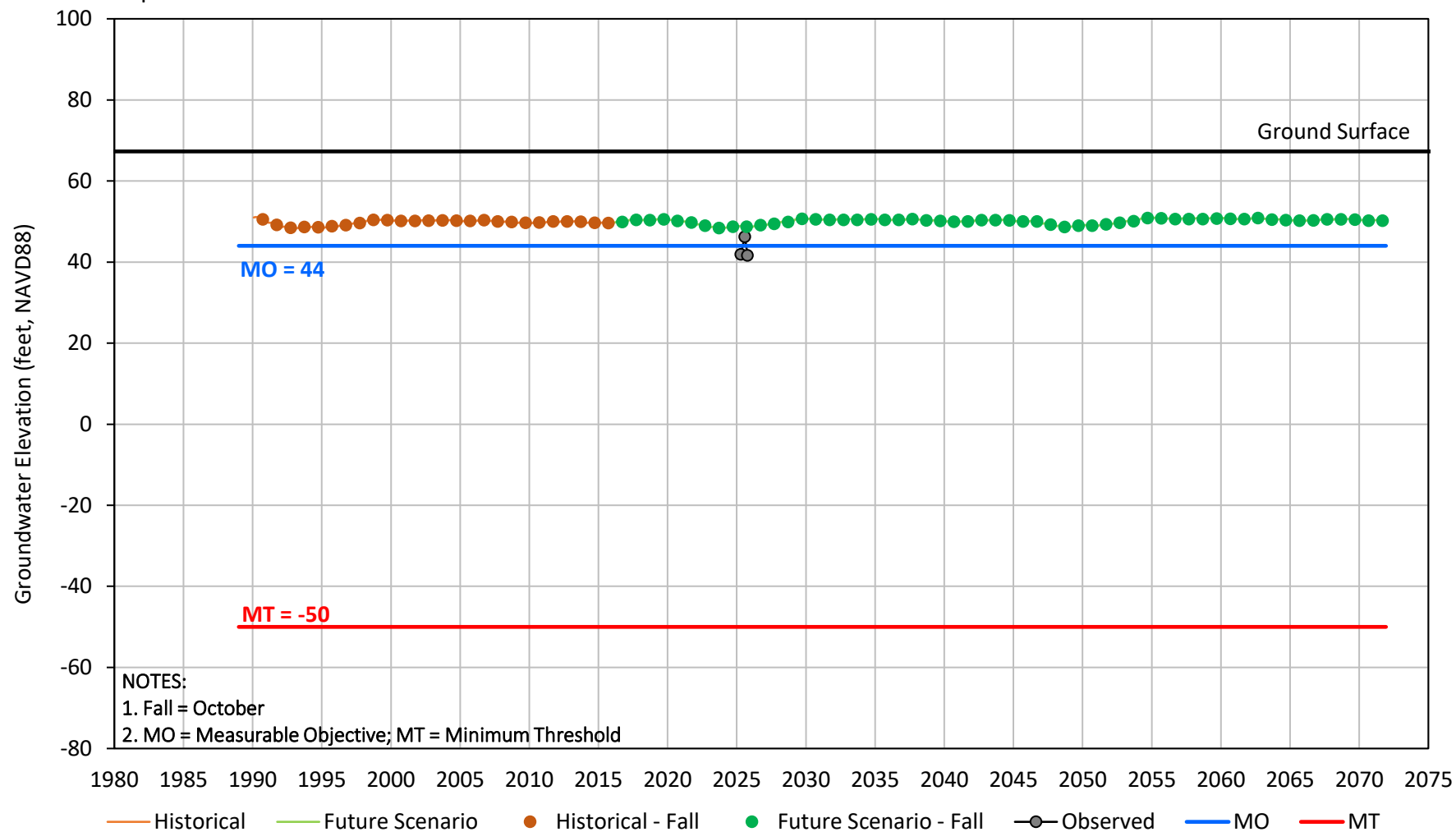


MW-N3S Groundwater Level SMC Hydrograph

East Bay Plain Subbasin
Groundwater Sustainability Plain

Figure 3-2

Well Name: MW-N1I
Aquifer: Intermediate



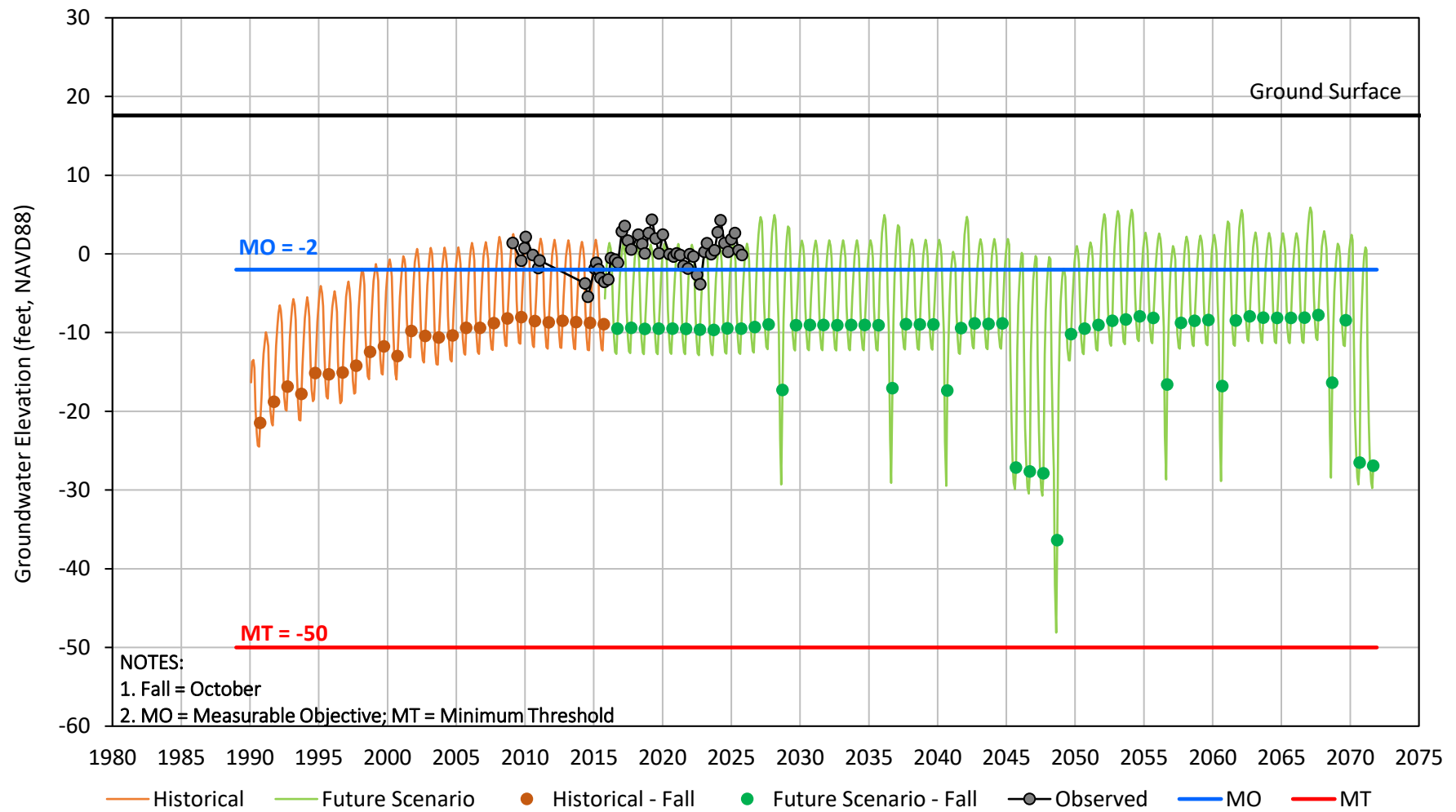
MW-N1I Groundwater Level SMC Hydrograph

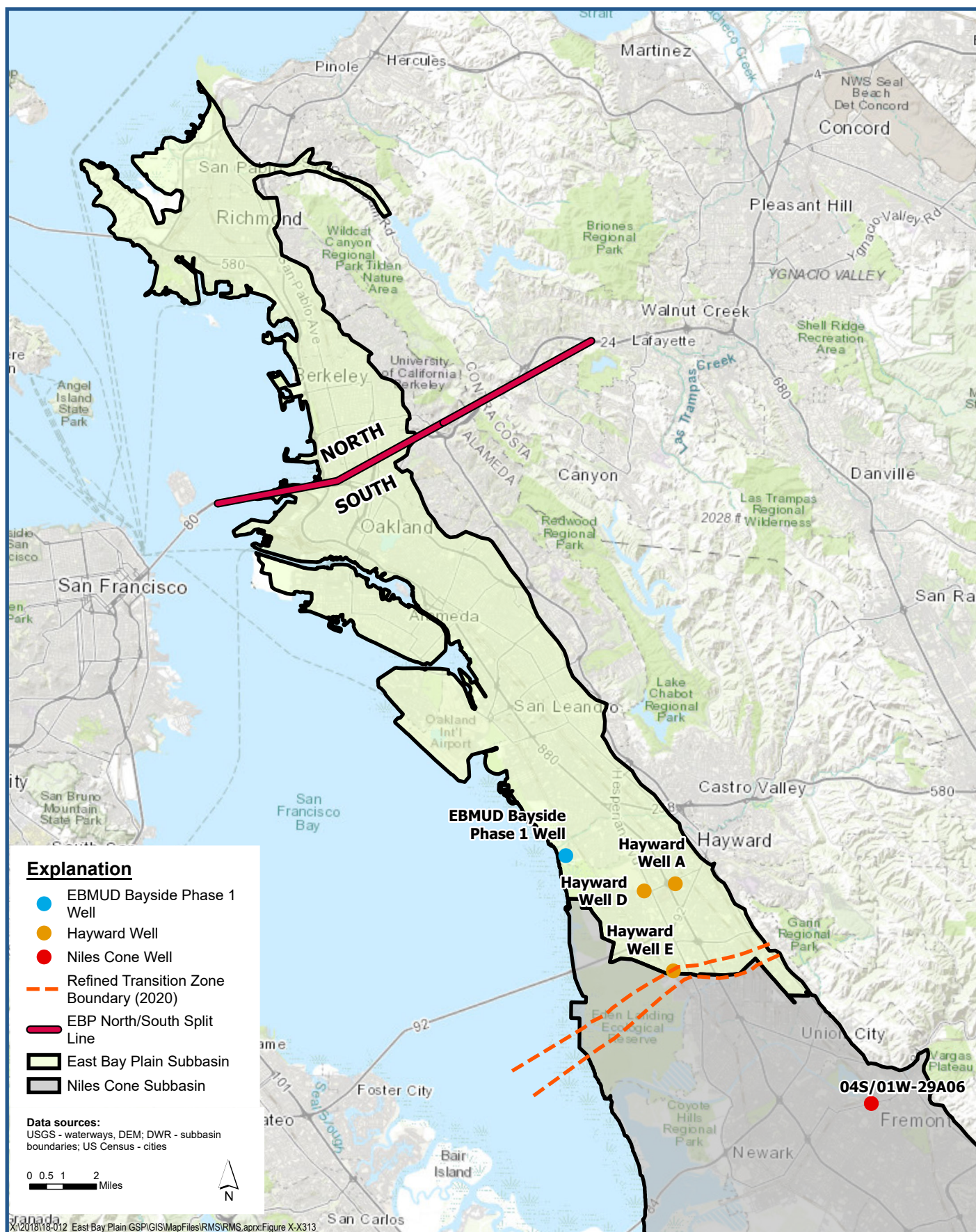
East Bay Plain Subbasin
Groundwater Sustainability Plain

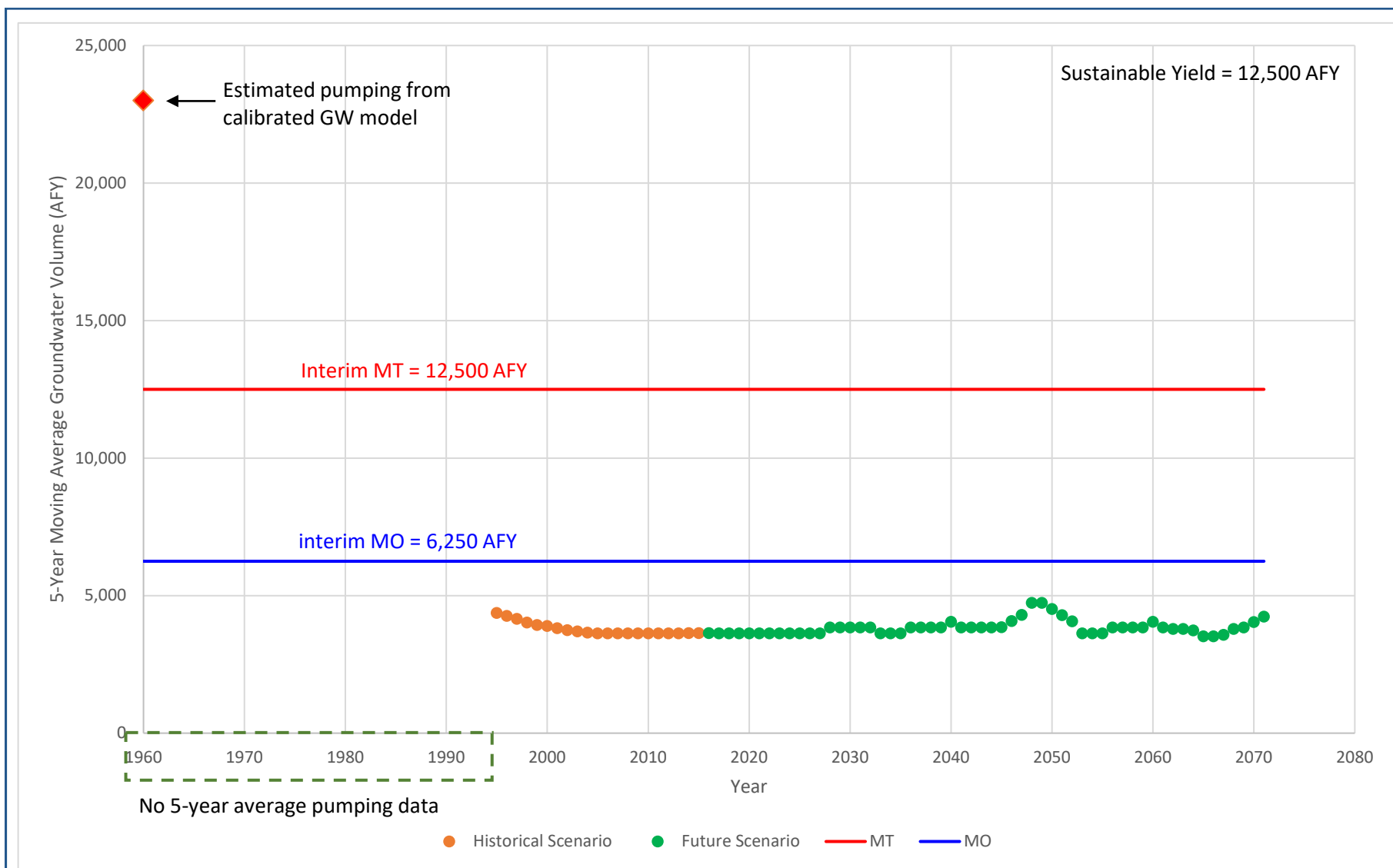
Figure 3-3

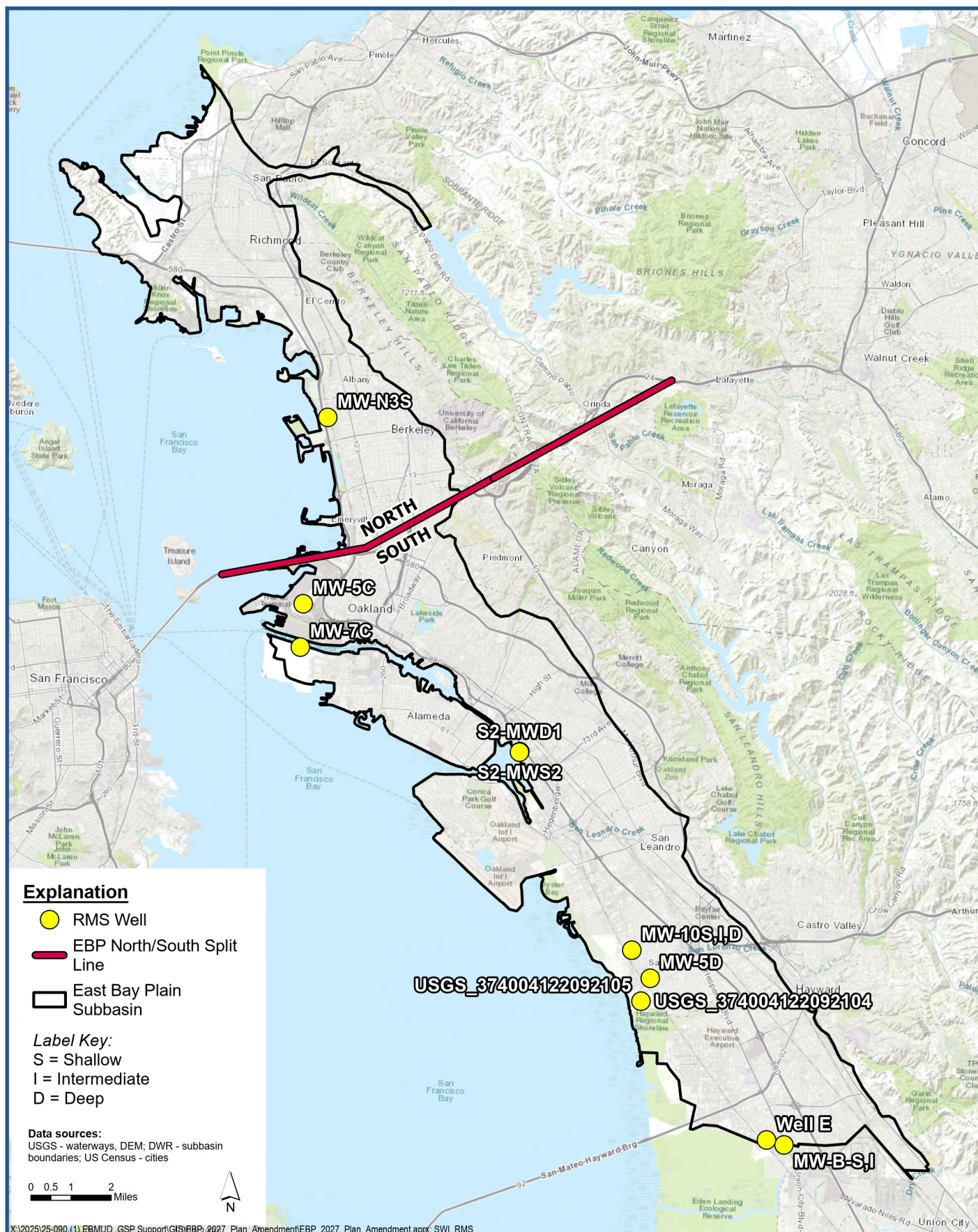
Well Name: MW-5D

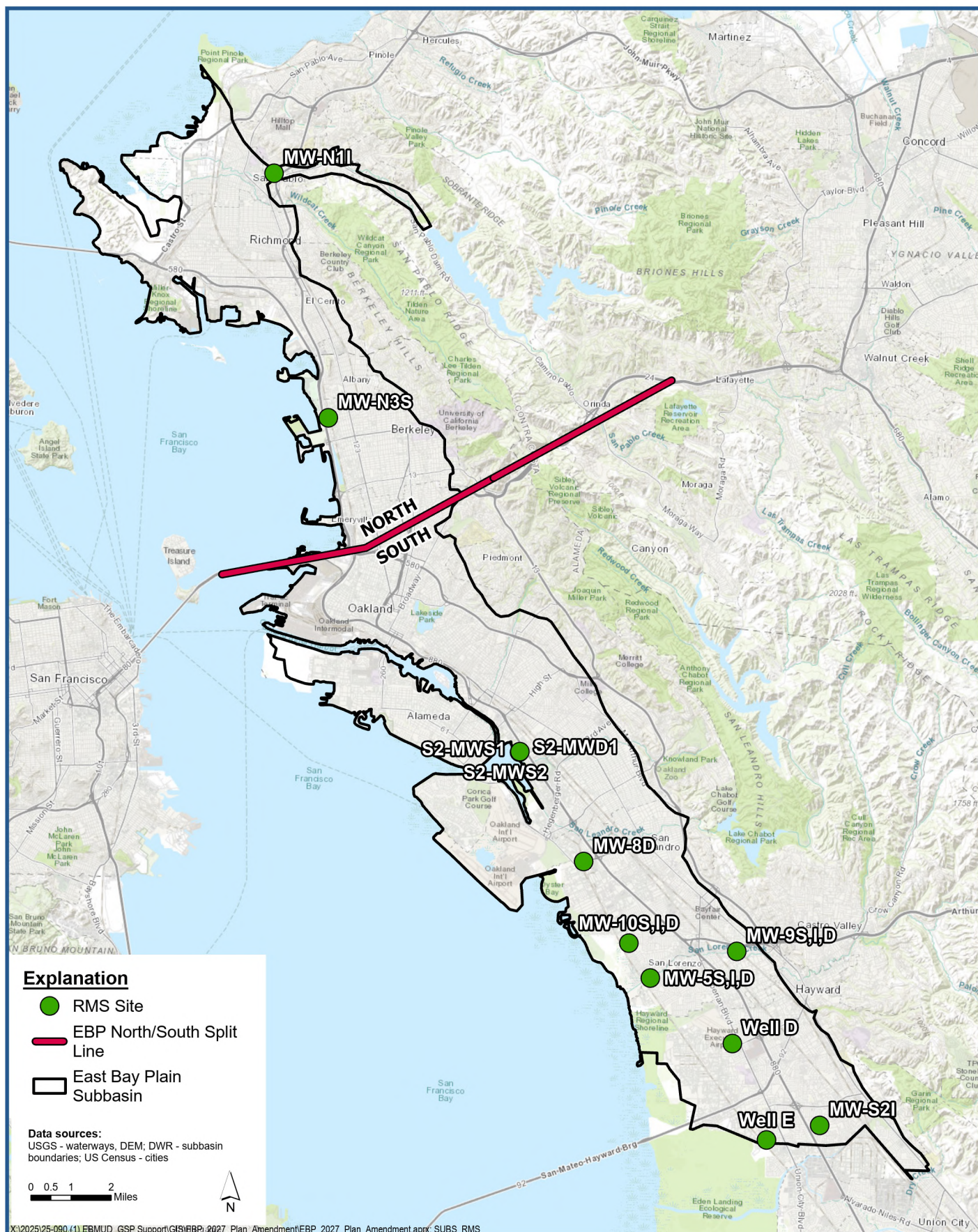
Aquifer: Deep

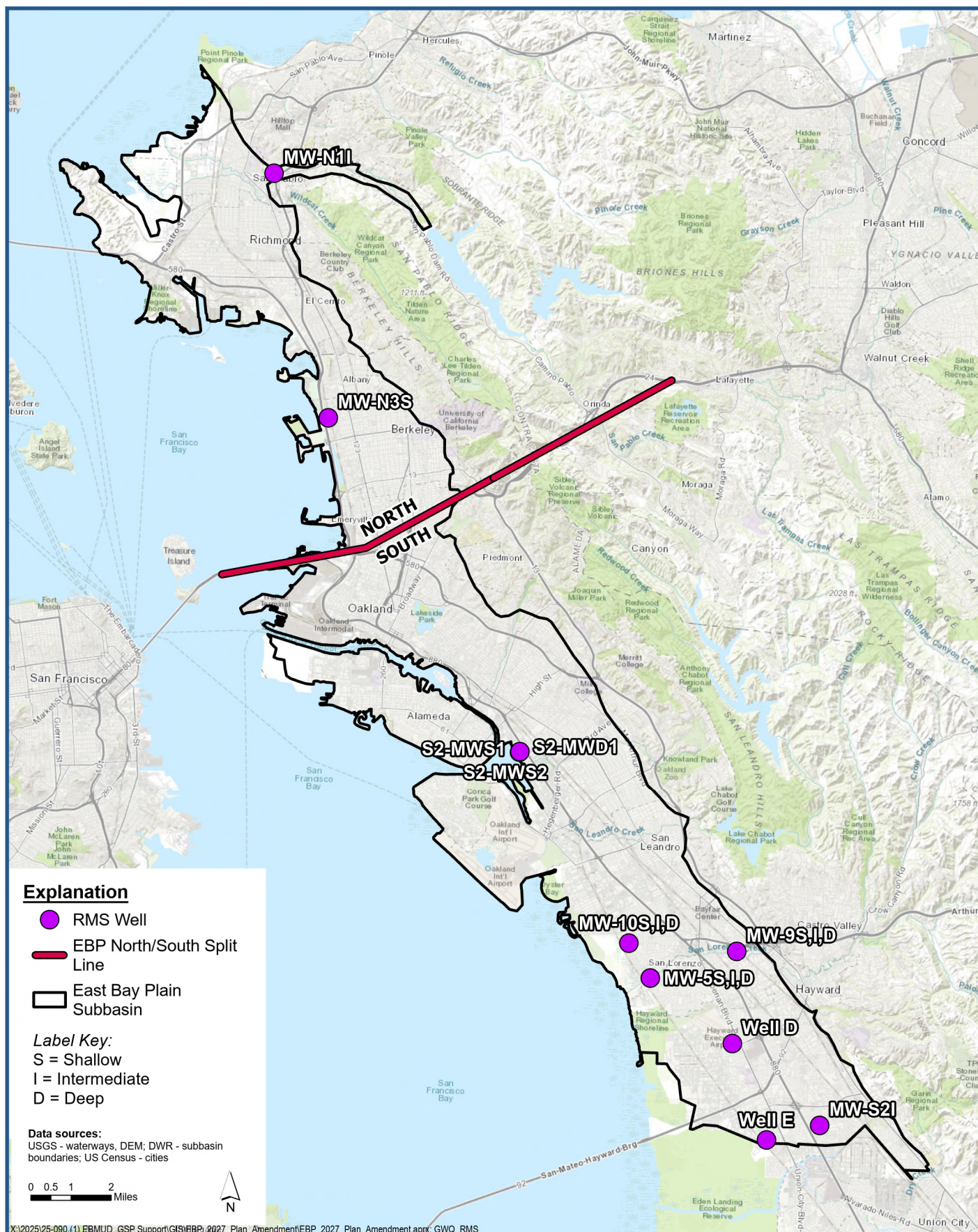












Well Name: MW-5D

Aquifer: Deep

NOTES:

1. MO = Measurable Objective; MT = Minimum Threshold

