

incorporation of extended historical records, the overall operating plan (Table 3-2) and specific distribution of Saugus Formation pumping were found to produce the same kinds of resultant Saugus Formation groundwater conditions as concluded to be sustainable in 2005 – (1) long-term stability of groundwater levels, with no sustained declines; (2) groundwater levels slightly below historic Saugus Formation levels, in response to greater long-term utilization of the Saugus and (3) maintenance of sufficiently high Saugus Formation groundwater levels to ensure achievement of planned individual pumping capacities (Table 3-5). Thus, the operating plan for the Saugus Formation, with fairly low pumping in wet/normal years and increased pumping through dry periods, is concluded to reflect sustainable groundwater supply rates.

The SCV-GSA's work on basin sustainability for the GSP has advanced the technical understanding of basin conditions since the 2009 basin yield analysis and confirms the previous conclusion. A new groundwater flow model using the U.S Geological Survey software MODFLOW-USG was developed calibrated and peer reviewed. The MODFLOW-USG model improves the spatial resolution and employs more sophisticated methods of representing stream/aquifer interactions among other advancements over the previous model. A more thorough discussion is documented in Development of a Numerical Groundwater Flow Model for the Santa Clara River Valley East Groundwater Subbasin (GSI 2020). Additionally, the GSP Water Budget Analysis reflects updated climate change assumptions provided by DWR. New GSP technical reports defining the extent and nature of groundwater dependent ecosystems informed potential future adjustments of pumping distributions throughout the Alluvial Aquifer and Saugus Formation when considering likely sustainability criteria and potential impacts on groundwater dependent ecosystems. Accordingly, the 2020 UWMP reflects adjusted pumping distributions that are reflected in this WSA's Table 3-5A.

On January 3, 2022, the SCV GSP adopted the GSP which reflected updated technical resources and analysis, and a robust public involvement and review process. The plan can be accessed at <https://scvgsa.org/wp-content/uploads/2022/02/Santa-Clara-River-Valley-East-Groundwater-Subbasin-GSP.pdf>

The plan reached the following conclusions relating to sustainability:

1. Chronic Lowering of Groundwater Levels – Alluvium and Saugus Formation pumping consistent with the basin operating plan does not result in chronic lowering of groundwater levels.
2. Reduction of Groundwater Storage - Alluvium and Saugus Formation pumping consistent with the basin operating plan does not result in the long-term groundwater storage depletion.
3. Degraded Water Quality – Implementation of treatment for known contaminants support continued Alluvium and Saugus Formation pumping consistent with the operating plan.
4. Land Subsidence – An evaluation of the available information indicates there is now evidence of land subsidence occurring. The GSP does identify additional data