



Water and Resource Conservation

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Butte County Groundwater Pumpers Advisory Committee

Meeting Agenda

Meeting Date: April 17, 2017

Time: 8:30AM

Place: Chico State University Farm, Room A009 & 0010, Chico, CA

Agenda Items

1. Welcome – Chair Heringer
2. Roll Call – Chair Heringer
3. *Review and approval of the March 20, 2017 GPAC minutes
4. *Discussion and possible recommendation to the Board of Supervisors to adopt GPAC Bylaws (Paul Gosselin, Water and Resource Conservation)
5. Presentation on Groundwater Sustainability Plan requirements (Mary Randall, Department of Water Resources, Northern Regional Office)
6. *Update on GSA Formation Process and Status (Vickie Newlin, Water and Resource Conservation)
7. *Discussion of and possible recommendation to the Board of Supervisors on Draft Guiding Principles (Paul Gosselin, Water and Resource Conservation)
8. Update of other SGMA issues – Staff & GPAC

9. GPAC members wishing to address items not listed on the agenda. (The GPAC is prohibited by state law from taking action on any item presented if it is not listed on the agenda).

10. Public members wishing to address the Commission on items not listed on the agenda. (The GPAC is prohibited by State law from taking action on any item presented if it is not listed on the agenda. Comments will be limited to five minutes per person)

11. Next meeting – May 15, 2017, 8:30AM, CSU Chico Farm.

12. Adjournment

*Materials attached



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Butte County Groundwater Pumpers Advisory Committee

Meeting Minutes

March 20, 2017

Time: 8:30AM

Place: Chico State University Farm, Room A009 & 0010, Chico, CA

Agenda Items

1. Welcome – Chair Heringer
2. Roll Call

Members present: Heringer, Strachan, Edgar, Daly, Schooling, Rice, Cole.
Members absent: Lavy and Sohnrey

3. Review and approval of the January 25, 2017 GPAC minutes

Motion by Daly and seconded Strachan to approve the January 25, 2017 minutes. Motion carried 7-0

4. Discussion and possible recommendation to the Board of Supervisors to adopt GPAC Bylaws

The GPAC tabled action on the Bylaws to the next meeting.

5. Update on GSA Formation Process and Status
 - a. GSA-eligible meetings
 - b. GSA Formation and the June 30th deadline

Staff gave an update on the GSA formation status. The GPAC requested a CASGEM map.

6. Discussion of Draft Guiding Principles

Staff presented the draft Guiding Principles that came from the 2016 Assessment of Stakeholder Perspectives report. The GPAC requested a copy of the entire report. The full report can be found at <https://www.buttecounty.net/wrcdocs/planning/SGWMA/GWAssess/SGMAAssessFinalRpt.pdf>

7. Update of other SGMA issues – Staff

- a. Basin Boundary Modification
- b. SGMA Implementation Grant
- c. Future GPAC agenda items

The GPAC requested that future meetings include a presentation on groundwater sustainability plan requirements and DWR's methodology used to determine land use. GPAC members discussed the briefings with the department on subbasin specific information. GPAC requested that the department work with GPAC members on public outreach in each subbasin.

8. GPAC members wishing to address items not listed on the agenda. (The GPAC is prohibited by state law from taking action on any item presented if it is not listed on the agenda).

None

9. Public members wishing to address the Commission on items not listed on the agenda. (The GPAC is prohibited by State law from taking action on any item presented if it is not listed on the agenda. Comments will be limited to five minutes per person)

None

10. Future meeting date(s)

The GPAC set a regular meeting schedule for the third Monday of the month at 8:30AM. The next meeting will be on April 17, 2017 at 8:30AM.

11. Adjournment

BYLAWS OF THE BUTTE COUNTY

GROUNDWATER PUMPERS ADVISORY COMMITTEE

ART. I NAME AND PURPOSE

Sec. 1 - The name of the Advisory Committee shall be the Butte County Groundwater Pumpers Advisory Committee (GPAC).

Sec. 2 – The purposes of the GPAC shall be to:

First: Act as a liaison between groundwater pumpers and the County on issues regarding the management of groundwater and the development of the Groundwater Sustainability Plan.

Second: Provide advice to the Board of Supervisors on matters related to Butte County's implementation of the Sustainable Groundwater Management Act (SGMA).

ART. II GPAC

Sec. 1 – The GPAC shall consist of the nine members appointed by the Butte County Board of Supervisors. Eight members will be independent groundwater pumpers (two from each of the four sub-basins that are not serviced by a surface water district within that basin). There will be one environmental representative preferably with scientific and/or technical credentials relevant to environmental use of groundwater within the groundwater basins within Butte County and preferably a groundwater pumper.

Sec. 2 - The GPAC will remain intact throughout the development of the SGMA planning process.

Sec. 3 - GPAC members shall serve a three-year term beginning from date of appointment. Members may be appointed for additional terms.

Sec. 4 – GPAC members serve voluntarily without compensation or reimbursement

Sec. 5 - Removal of a member of the GPAC is at the sole discretion of the Board of Supervisors.

Sec. 6 – Five members shall constitute a quorum for meetings of the GPAC

Art. III OFFICERS AND TERMS OF APPOINTMENT

Sec. 1 – The officers of the GPAC shall be the Chair and Vice Chair to be elected by the GPAC at its first meeting of each calendar year.

Sec. 2 – Officers shall assume the office immediately upon election and serve until the following January.

Sec. 3 – If an office, other than the Chair becomes vacant, the same shall be filled by a vote of the GPAC and the appointee shall serve the unexpired term.

Art. IV DUTIES OF OFFICERS

Sec. 1 – The Chair shall preside at all regular and special meetings of the GPAC.

Sec. 2 – The Vice Chair shall assume the powers and duties of the Chair in the event that the Chair is absent and shall succeed the Chair when a vacancy occurs in that office.

Art. V MEETINGS

Sec. 1 – Meetings shall be held as necessary.

Sec. 2 – Meetings shall comply with the Brown Act

Sec. 3 – Meeting shall be public and minutes shall be maintained of all meetings.

Sec. 4 – Recommendations to the Board of Supervisors shall be made by a majority vote of the GPAC members present at the meeting.

Art. VI AMENDMENTS

Sec 1 – The Bylaws may be amended by proposals submitted in writing to the Chair. GPAC members will be afforded not less than 30 days to review proposed Bylaw amendments before the date of the meeting at which the said amendment will be voted upon.

Sec 2 – Unless otherwise stipulated, all amendments to the Bylaws shall become effective immediately following approval by the GPAC and ratified by the Board of Supervisors.

Art. VII RULES OF ORDER

Sec 1 – Roberts Rules of Order will be used as a general guideline, subject to the need and at the discretion of the Chair.

GPAC By-Laws

Recommendations for Additions to By-Laws by some GPAC members and stakeholders.

Art. IV Duties of Officers

Sec. 1- The Chair shall preside at all regular and special meetings of the GPAC-----and receive coordination from the Department on proposed agenda items.

Art. V Meetings

Sec. 1- Meetings shall be held as necessary-----including in response to the request of at least three members.

Sec. 2- Members may propose, and the membership may vote on items proposed for future meeting agendas. A majority vote will require an item be included on the next agenda.

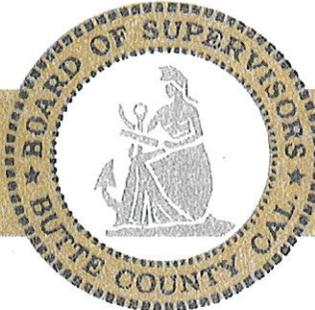
Sec. 3- Meetings shall comply....

Sec. 4- Meetings shall be public....

Sec. 5- Recommendations

Thank You for your considerations.

GPAC member East Butte
Gary Cole



BOARD OF SUPERVISORS
COUNTY OF BUTTE, STATE OF CALIFORNIA

Resolution No. 17-051

**RESOLUTION TO ADVANCE IMPLEMENTATION OF THE SUSTAINABLE
GROUNDWATER MANAGEMENT ACT IN THE WYANDOTTE CREEK SUBBASIN**

WHEREAS, the Sustainable Groundwater Management Act of 2014 went into effect on January 1, 2015; and

WHEREAS, the Sustainable Groundwater Management Act of 2014 enables the State Water Resources Control Board to intervene in groundwater basins unless a local public agency or combination of local public agencies form a Groundwater Sustainability Agency or Agencies (GSA) by June 30, 2017 (Water Code §10735); and

WHEREAS, retaining local jurisdiction over water management and land use is essential to sustainably manage groundwater and to the vitality of Butte County's economy, communities, and environment; and

WHEREAS, any local public agency that has water supply, water management, or land use responsibilities within a subbasin may elect to be a Groundwater Sustainability Agency (Water Code §10721 and §10723(a)); and

WHEREAS, counties are presumed to be the Groundwater Sustainability Agency for areas within a basin that are not within the management area of another Groundwater Sustainability Agency (Water Code §10724); and

WHEREAS, Butte County is eligible and presumed to be a Groundwater Sustainability Agency for the portions of the Vina, West Butte, East Butte, and Wyandotte Creek (formally North Yuba) subbasins in Butte County; and

WHEREAS, on October 13, 2015, after holding a public hearing and publication of notice pursuant to Government Code section 6066, the Butte County Board of Supervisors adopted Resolution No. 15-146, electing to become a GSA for all portions of Butte County that overlie the Vina, West Butte, East Butte, and Wyandotte Creek (formally the North Yuba) subbasins; and

WHEREAS, on January 5, 2016, the City of Oroville held a public hearing to determine whether to become a GSA and on January 5, 2016, the City of Oroville adopted a Resolution No. 8452, electing to become a GSA in the Wyandotte Creek subbasin; and

WHEREAS, on January 7, 2016, the South Feather Water and Power Agency held a public hearing to determine whether to become a GSA and on January 7, 2016, the South Feather Water and Power Agency adopted a Resolution No. 16-01-01, electing to become a GSA in the Wyandotte Creek subbasin; and

WHEREAS, on January 1, 2016, legislation known as Senate Bill 13 took effect which among other things requires that if the proposed GSA management areas of two or more entities overlap, then none of the entities would be recognized as GSAs until the overlap was resolved or eliminated (Water Code §10723.8(c)); and

WHEREAS, the Butte County GSA areas submitted through Resolution No. 15-146 overlap the GSA areas of the City of Oroville and the South Feather Water and Power Agency and has prevented the establishment of GSAs as required by SGMA; and

WHEREAS, failing to eliminate the GSA overlaps and establish GSAs by June 30, 2017 will subject the respective basin to State Water Resources Control Board intervention that will result in the imposition of fees and the loss of local land use and water management authority; and

WHEREAS, pursuant Water Code §10723.8(c), entities whose proposed GSA management areas overlap may modify their proposed management areas in order to eliminate overlaps, and such modification does not require a new Notice of Intent unless the modification would effect a "material change" to the previously submitted Notice of Intent; and

WHEREAS, Butte County, the City of Oroville, and the South Feather Water and Power Agency support a cooperative and ongoing working relationship that will allow compliance with SGMA through eliminating GSA boundary overlaps and establish multi-GSA partnerships; and

WHEREAS, the South Feather Water and Power Agency elects to resolve the overlap by withdrawing their application to be a GSA; and

WHEREAS, the South Feather Water and Power Agency can continue participation and support of SGMA compliance efforts in the Wyandotte Creek subbasin through a partnership with Butte County and the City of Oroville; and

WHEREAS, Butte County can resolve the overlap with the City of Oroville by modifying its GSA notice with a revised GSA map which reflects that the Butte County GSA area will be the portions of the Wyandotte Creek subbasin not covered by the City of Oroville; and

WHEREAS, Butte County and the City of Oroville can advance SGMA compliance for the Wyandotte Creek subbasin by entering into a partnership; and

WHEREAS, the GSA filing modifications and actions proposed herein would resolve the overlaps in the Wyandotte Creek subbasin and do not involve a material change requiring a new notice of intent.

NOW, THEREFORE, BE IT RESOLVED that the Board of Supervisors of the County of Butte hereby modifies its proposed GSA management areas in the Wyandotte Creek (5-21.60) subbasin as depicted in the maps attached as Exhibit A; and

BE IT FURTHER RESOLVED that the Board of Supervisors of the County of Butte supports advancing the planning process of SGMA in the Wyandotte Creek subbasin by entering into a memorandum of understanding with the City of Oroville and the South Feather Water and Power Agency; and

BE IT FURTHER RESOLVED that the Butte County Department of Water and Resource Conservation is authorized to submit a modified GSA boundary and other related documents for the Wyandotte Creek subbasin.

PASSED AND ADOPTED by the Butte County Board of Supervisors this 28th day of March, 2017 by the following vote:

AYES: Supervisors Wahl, Kirk, Lambert, Teeter, and Chair Connelly

NOES: None

ABSENT: None

NOT VOTING: None



BILL CONNELLY, Chair
Butte County Board of Supervisors

ATTEST:

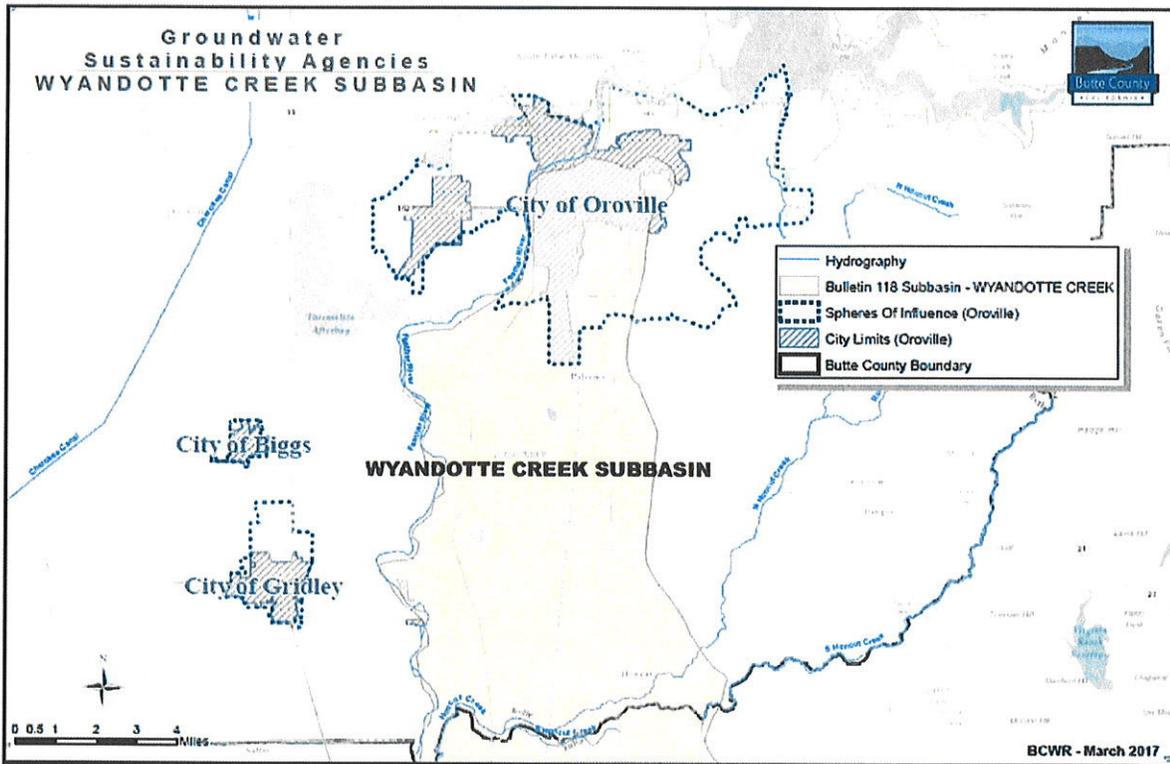
PAUL HAHN, Chief Administrative Officer
and Clerk of the Board of Supervisors

By: _____

Deputy



Exhibit A:
Wyandotte Creek Subbasin
Groundwater Sustainability Agency Areas



**MEMORANDUM OF UNDERSTANDING FORMING THE
WYANDOTTE CREEK SUB-BASIN
GROUNDWATER SUSTAINABILITY PARTNERS**

THIS MEMORANDUM OF UNDERSTANDING (MOU) is made and entered into on February 21, 2017, by and between the County of Butte ("County" herein), and the City of Oroville ("City" herein), each a "Party" and collectively the "Parties".

WHEREAS, on September 16, 2014, Governor Jerry Brown signed into law Senate Bills 1168 and 1139 and Assembly Bill 1739, known collectively as the Sustainable Groundwater Management Act ("SMGA"); and

WHEREAS, the purpose of SGMA is to create a comprehensive management system in the State of California by creating a structure to manage groundwater at the local level, while providing authority to the State to oversee and regulate, if necessary, the local groundwater management system; and

WHEREAS, SGMA empowers local agencies to adopt groundwater sustainability plans that are tailored to the resources and needs of their communities to provide a buffer against drought and contribute to reliable water supply for the future; and

WHEREAS, Water Code Section 10723.6 authorizes a combination of local agencies overlying a groundwater basin to elect to become a Groundwater Sustainability Agency ("GSA") by using a memorandum of agreement or other agreement; and

WHEREAS, County is a local agency qualified to become a GSA because County manages water, has a water supply, and has land use responsibilities over a portion of the Wyandotte Creek Sub-basin (Basin Number 5-021-69), DWR Bulletin 118) within the Sacramento Valley Groundwater Basin ("Basin") a DWR-designated medium-priority basin; and

WHEREAS, City is a local agency qualified to become a GSA because City has land use responsibilities over a portion of the Wyandotte Creek Sub-basin within the County of Butte; and

WHEREAS, on October 15, 2015, County held a public hearing to determine whether to become a GSA and on October 15, 2015, County adopted Resolution No. 15-146, electing to become a GSA; and

WHEREAS, on January 5, 2016, City held a public hearing to determine whether to become a GSA and on January 5, 2016, City adopted Resolution No. 8452, electing to become a GSA; and

WHEREAS, as GSAs, the Parties have elected to work collaboratively with other interested agencies to develop and implement a Groundwater Sustainability Plan ("GSP") to sustainably manage the Wyandotte Creek Sub-Basin pursuant to SGMA.

NOW THEREFORE, incorporating the above recitals herein and exhibits attached, it is mutually understood and agreed as follows:

1. **PURPOSE.** This MOU is entered into by and between the Parties to facilitate a cooperative and ongoing working relationship that will allow compliance with SGMA and State law, both as amended from time to time. The primary goal of the MOU is to eliminate overlap between the GSAs and to establish a working partnership to move toward a multi-GSA agreement to cover all portions of the Wyandotte Creek Sub-Basin prior to the June 30, 2017 deadline set under SGMA. Henceforth, the Parties may expand the goals of the Wyandotte Creek SGMA Partners to address future deadlines established under SGMA.
2. **WYANDOTTE CREEK SUB-BASIN GROUNDWATER SUSTAINABILITY PARTNERS.** The Parties hereby establish the Wyandotte Creek Sub-Basin Groundwater Sustainability Partners (Wyandotte Creek SGMA Partners) to manage that portion of the Wyandotte Creek Sub-basin as set forth in Exhibit "A".
3. **POWERS.**
 - 3.1 In additional to any other action available to develop and implement SGMA, including a GSP, the Wyandotte Creek SGMA Partners may perform the following functions:
 - 3.1.1 Adopt standards for measuring and reposting water use.
 - 3.1.2 Develop and implement policies designed to reduce or eliminate overdraft within the boundaries of the Wyandotte Creek Sub-basin.
 - 3.1.3 Develop and implement conservation best management practices as outlined by DWR.
 - 3.1.4 Develop and implement metering, monitoring and reporting related to groundwater pumping.
4. **DECISION MAKING PROCESS.**
 - 4.1 With the exceptions noted herein, it is the intent of the Parties that all actions undertaken by the Wyandotte Creek SGMA Partners are done by unanimous consent of the Parties.
 - 4.2 In the event of an impasse or disagreement, the Parties shall use their best efforts to find a mutually agreeable result. To this effect, the Parties shall consult and negotiate with each other in good faith in an attempt to reach a solution that is mutually satisfactory. If the Parties do not reach a solution,

them the matter shall be submitted to a non-binding arbitration or mediation within a reasonable period of time.

5. ROLES AND RESPONSIBILITIES OF THE PARTIES.

5.1 The Parties will work jointly to fulfill the Purposes of the MOU, SGMA, and the development and implementation of a GSP within the boundaries of the Wyandotte Creek Sub-basin.

5.2 The Parties will meet regularly to discuss SGMA, GSP development and implementation activities, assignments, and on-going work progress.

5.3 The Parties may form committees as necessary from time to time to discuss issues that impact the Wyandotte Creek Sub-basin.

5.4 County and City are jointly responsible for implementing the GSP in areas of the Wyandotte Creek Sub-basin that are within both City limits and Butte County boundaries.

6. FUNDING. Unless agreed to otherwise, each Party's participation in the MOU is at its sole cost and expense. Through the partnership of this MOU, Parties will work together to help secure grant funding for the development of GSPs for all sub-basins within the County of Butte.

7. TERM. This MOU shall remain in effect unless terminated by the mutual consent of the Parties and as allowed by State law.

8. AMENDING THE MOU. This MOU and Exhibits hereto may only be amended by a subsequent writing, approved and signed by all Parties.

9. HOLD HARMLESS. No Party, not any officer or employee of a Party, shall be responsible for any damage or liability occurring by reason of anything done or omitted to be done by another Party under or in connection with this MOU.

/

APPROVED AS TO CONTENT:

COUNTY OF BUTTE

By: Bill Connelly

Date: 28 March 2017

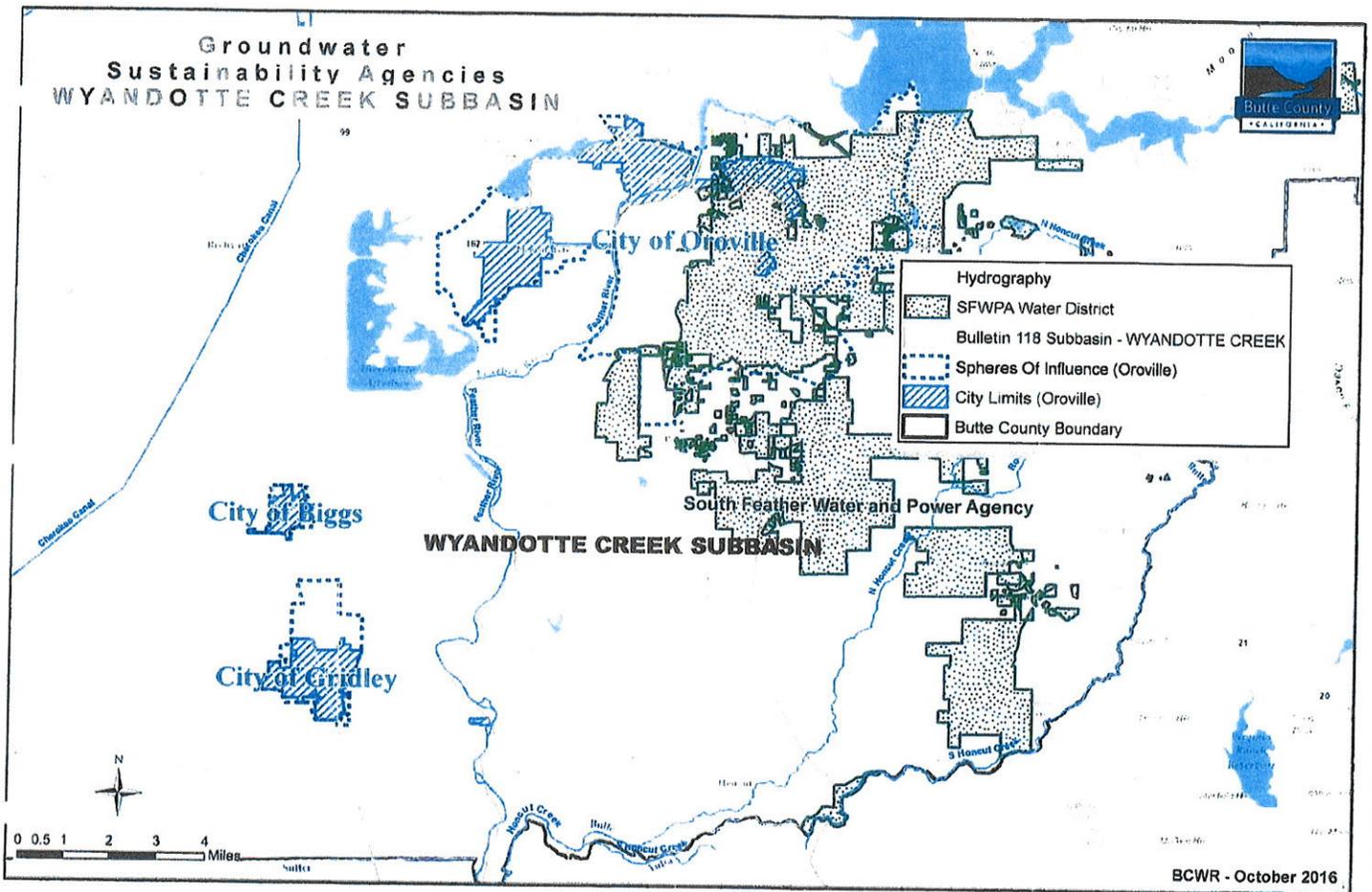
APPROVED AS TO CONTENT:

CITY OF OROVILLE

By: Linda L. Dahlmeier
Linda L. Dahlmeier, Mayor

Date: 02.21.2017

EXHIBIT A



**MEMORANDUM OF UNDERSTANDING BETWEEN PARTIES WITHIN THE
WYANDOTTE CREEK SUB-BASIN AS RELATED TO THE SUSTAINABLE
GROUNDWATER MANAGEMENT ACT**

THIS MEMORANDUM OF UNDERSTANDING (MOU) is made and entered into on February 21, 2017, by and between the County of Butte ("County" herein), South Feather Water and Power Agency ("Agency" herein) and the City of Oroville ("City" herein), each a "Party" and collectively the "Parties".

WHEREAS, on September 16, 2014, Governor Jerry Brown signed into law Senate Bills 1168 and 1139 and Assembly Bill 1739, known collectively as the Sustainable Groundwater Management Act ("SMGA"); and

WHEREAS, the purpose of SGMA is to create a comprehensive management system in the State of California by creating a structure to manage groundwater at the local level, while providing authority to the State to oversee and regulate, if necessary, the local groundwater management system; and

WHEREAS, SGMA empowers and requires local agencies to develop and adopt Groundwater Sustainability Plans ("GSP") that are tailored to the resources and needs of their communities, provide a buffer against drought and contribute to reliable water supply for the future; and

WHEREAS, Water Code Section 10723.6 authorizes a combination of local agencies overlying a groundwater basin to elect to become a Groundwater Sustainability Agency ("GSA") by using a memorandum of agreement or other agreement; and

WHEREAS, Butte is a local agency qualified to become a GSA because Butte manages water, has a water supply, and has land use responsibilities over a portion of the Wyandotte Sub-basin (Basin Number 5-021-69), DWR Bulletin 118) within the Sacramento Valley Groundwater Basin ("Basin") a DWR-designated medium-priority basin; and

WHEREAS, Agency is a local agency qualified to become a GSA because South Feather manages water and has a water supply which it manages within the Wyandotte Sub-basin; and

WHEREAS, Oroville is a local agency qualified to become a GSA because Oroville has land use responsibilities over a portion of the Wyandotte Sub-basin within the County of Butte; and

WHEREAS, on October 15, 2015, Butte held a public hearing to determine whether to become a GSA and on October 15, 2015, Butte adopted Resolution No. 15-146, electing to become a GSA; and

WHEREAS, on January 7, 2016 Agency held a public hearing to determine whether to become a GSA and on January 7, 2016, South Feather adopted Resolution No. 16-01-01, electing to become a GSA; and

WHEREAS, on January 5, 2016, Oroville held a public hearing to determine whether to become a GSA and on January 5, 2016, Oroville adopted Resolution No. 8452, electing to become a GSA; and

NOW THEREFORE, incorporating the above recitals herein and exhibits attached, it is mutually understood and agreed as follows:

PURPOSE. This MOU is entered into by and between the Parties to facilitate a cooperative and ongoing working relationship to develop the Wyandotte Creek GSP that will allow compliance with SGMA and State law, both as amended from time to time. The primary goal of the MOU is to eliminate overlap between the GSAs and to establish a working partnership to move toward a multi-GSA agreement to cover all portions of the Wyandotte Sub-Basin prior to the June 30, 2017 deadline set under SGMA.

To this end, Agency agrees to retract its GSA designation, making the County and the City the exclusive GSAs for the Wyandotte Creek sub-basin. Both County and City will retain their GSA status for the lands within their own jurisdiction. County will take action to retract its overlap with the lands under City's jurisdiction.

Agency agrees to their retraction of GSA designation under SGMA with the following terms as agreed to by both County and City:

- a. No fees, assessments, or other charges pertaining to groundwater management and extraction will be charged by County and City to Agency or Agency's landowners without the prior written consent of Agency.
- b. No groundwater extraction limits will be imposed by County or City on the Agency of its landowners without the written consent of Agency.
- c. No alteration of the current boundaries of the Wyandotte Creek Subbasin or consolidation of the subbasin shall be considered or taken by the County or City without the advance written consent of Agency.
- d. No direct or indirect regulation or interference with the surface water rights or groundwater rights of the Agency or the landowners within the Agency shall be taken by County or City without the written consent of Agency.

In exchange for these terms, Agency agrees to the following terms:

- a. To support the efforts of the County and the City to obtain grant funding for the development of the GSP for the Wyandotte Creek subbasin.
- b. To provide to County associated data collected by the Agency as related to the sustainability of the subbasin, which will be utilized in the development and implementation of the GSP for the Wyandotte Creek subbasin.

- c. To work cooperatively with County and City in the review and development of the GSP for the Wyandotte Creek subbasin.

All Parties agree that all actions taken and/or contemplated under the GSP will be based on sound groundwater science that will drive the development of the sustainability goals of the basin as outlined under SGMA.

2. **TERM.** This MOU shall remain in effect unless terminated by the mutual consent of the Parties and as allowed by State law.
3. **AMENDING THE MOU.** This MOU and Exhibits hereto may only be amended by a subsequent writing, approved and signed by all Parties.
4. **HOLD HARMLESS.** No Party, not any officer or employee of a Party, shall be responsible for any damage or liability occurring by reason of anything done or omitted to be done by another Party under or in connection with this MOU

COUNTY OF BUTTE

By: Bill Connelly

DATE: 28 March 2017

CITY OF OROVILLE

By: Linda L. Dahlmeier
Linda L. Dahlmeier, Mayor

DATE: 02.21.2017

SOUTH FEATHER WATER AND POWER

By: Roth T. Mundy

DATE: 3-29-17

Butte County Sub-Basins:
GSA Eligible Entities – January 26, 2017

Guiding Principles for SGMA Governance – Version 1

The following are potential principles to guide future SGMA governance by Eligible Local Agencies (ELAs) for sub-basins lying within Butte County. These proposed principles are derived from the 2016 Butte County SGMA stakeholder assessment report feedback (<https://www.buttecounty.net/wrcdocs/planning/SGWMA/GWAssess/SGMAAssessFinalRpt.pdf>). They are intended as a starting point for ELAs to discuss, add to, and modify as decisions are made about GSA formation and future SGMA governance. The goal is to define a set of working principles that are shared among ELAs and that consistently and constructively shape SGMA interactions and decision making.

- Maximize value of familiar structures and relationships
- Acknowledge all key interests of eligible local agencies
- Respect legally recognized rights
- Anticipate GSP requirements
- Make use of basin boundary adjustments
- Comply with SGMA and regulations
- Identify opportunities to address interest of non-GSA stakeholders
- Distribute costs equitably and avoid fees if possible
- Respect mutual interests in maintaining independent decision making