



CALIFORNIA DEPARTMENT OF WATER RESOURCES

SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

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August 22, 2025

Lisa Hunter
Corning Subbasin – Plan Manager
225 North Tehama Street
Willows, CA 95988
lhunter@countyofglenn.net

RE: Review of Annual Report for the Corning Subbasin, Water Year 2024

Dear Lisa Hunter,

As the basin point of contact for the groundwater sustainability plan (GSP) in the Corning Subbasin (Subbasin), this letter is to inform you that the Department of Water Resources (Department) has completed the review of the annual report for the Subbasin for Water Year 2024 and is requesting additional information.

The Sustainable Groundwater Management Act (SGMA) requires on April 1, following the adoption of a GSP and annually thereafter, an annual report be submitted to the Department. (Wat. Code § 10728). Once an annual report has been submitted, the Department is required to: notify the submitting agency of receipt within 20 days, notify the submitting agency in writing if additional information is required, and review the information to determine whether the basin's GSP is being implemented in a manner likely to achieve the sustainability goal for the basin (23 CCR § 355.8).

The Department noted that the annual report provided an update on all the applicable sustainable management criteria for the Basin/Subbasin, as required by GSP Regulations (23 CCR § 356.2). The Department expects this information will continue to be provided in subsequent annual reports, along with a description of progress made toward implementing the Plan for each of the applicable sustainable indicators.

Based on the review of the annual report, the Department requests additional information pursuant to 23 CCR § 355.8.(b). Department staff identified several pieces of additional information the GSA should provide.

Department staff note that according to several undesirable result metrics, the Corning Subbasin is currently experiencing multiple minimum threshold exceedances and appears to be at risk for experiencing undesirable results during the upcoming water year. The fact that these groundwater level conditions were experienced during an above normal water year in 2024 merits consideration of whether adjustments in basin management are required to remain on track to achieve sustainability. Staff request

additional information from the GSA on how the GSA is or will be implementing Projects and Management Actions (PMAs) in response to exceeding minimum thresholds.

The 2024 GSP identifies an undesirable result condition for groundwater levels as one where 10 dry supply wells occur within a Thiessen polygon or when water levels at any Representative Monitoring Points (RMP) decline 7.5 feet over a five year period.¹ Staff note that the 2024 Annual Report provides a comparison of Fall 2023 and Fall 2024 groundwater levels that indicates of 54 RMPs, 17 did not have enough measurements taken to make a comparison, 17 experienced higher groundwater elevations in fall 2024 than fall 2023, and 20 experienced lower groundwater elevations in fall 2024 than fall 2023.² Table 5-2 also indicates that nine RMP were lower in fall 2024 by over five feet, and five of those nine experienced a decline in elevation over 7.5 feet, indicating that these five locations are potentially going to experience an undesirable result as defined in the 2024 GSP.

The 2024 Corning Annual Report identifies an undesirable result for groundwater storage as occurring when more than 20% of wells drop below their groundwater levels minimum threshold in two consecutive fall measurements, using levels as a proxy for storage,³ and the 2024 Corning Annual Report indicates that 13 RMPs fell below minimum thresholds during this year.⁴ Staff note that 20% of the monitoring network's 54 RMP locations is 11 RMPs, and that if the same 13 wells fall below minimum thresholds next year, the Subbasin would be experiencing undesirable results.

Staff additionally note that the 2024 Corning GSP identifies declining groundwater levels as an ongoing concern in the basin and states that "substantial portions of the subbasin appear to have an unsustainable water supply."⁵ However, the 2024 Corning Annual Report indicates that minimal progress has been made on implementation of PMAs that address declining groundwater levels, with only the California Olive Ranch project showing progress.⁶ The GSAs should clearly identify specific projects and management actions to address the "substantial portions of the subbasin that appear to have an unsustainable water supply."

Based on the issues identified above, the additional information that must be submitted in all future annual reports includes the following:

1. Detailed description of implementation actions taken by the GSAs to avoid and reverse the occurrence of minimum threshold exceedances and/or undesirable results. This information should clearly articulate how the GSAs are making adequate progress to reach the Subbasin's sustainability goal.

¹ 2024 Corning GSP, Section 6.6.1, p. 428.

² 2024 Corning Annual Report, Table 5-2, pp. 39-40.

³ 2024 Corning Annual Report, Section 5.2.1, p. 38.

⁴ 2024 Corning Annual Report, Section 5.2.1, p. 38.

⁵ 2024 Corning GSP, Section 6.6.1, p. 428.

⁶ 2024 Corning Annual Report, Table 5-6, p. 49, Section 5.4, pp. 49-54.

2. Description of specific projects and management actions to address the “substantial portions of the subbasin that appear to have an unsustainable water supply” as described by the GSAs.

Inclusion of the information requested in future annual reports is particularly relevant when the Department initiates a periodic review of a GSP. Periodic reviews utilize annual report information to examine basin condition trends and assess whether or not GSP implementation remains on track to achieve sustainability. Failure to provide the additional information requested may prompt the Department to initiate a periodic review, which may result in DWR determining that a Plan or its implementation is inadequate and referral to the State Water Resources Control Board under SGMA’s state intervention provisions.

Additionally, two minor issues were noted during the review:

- The annual report’s monitoring summary table⁷ provides values for Representative Monitoring Sites (RMS) that are labeled as the 2024 ‘spring (seasonal high)’ and ‘fall (seasonal low)’, however Department staff note that based on data submitted to the SGMA Portal,⁸ measurements taken by the GSA in August are lower than those taken in October in many RMS, and note that the table presents the higher elevation October measurements, which are not the seasonal low. Staff recommend the GSA provide the seasonal low as required by the GSP regulations⁹ in future annual reports. Additionally, staff recommend the GSA include the date of monitoring in its reporting of seasonal highs and lows in its annual reports and when providing these measurements in other contexts.
- The GSP indicates that the GSA has selected 54 representative monitoring site (RMS) locations for the chronic lowering of groundwater levels. The annual report indicates the GSA performed spring (seasonal high) monitoring on 36 (66%) of the RMS wells, and fall (seasonal low) monitoring on 43 (80%) of the RMS wells.¹⁰ Failure to collect data from a significant number of representative monitoring sites will likely affect the ability of the GSA to evaluate whether undesirable results are occurring and could affect the ability of the GSA to achieve its sustainability goal. The lack of such information also may hinder or prevent the Department from tracking plan implementation and assessing the continued likelihood of achieving sustainability.

Therefore, to address these minor issues, Department staff request that the GSA use the seasonal low measurement as required by GSP regulations and include the measurement date of the seasonal low measurement. Additionally, the GSA should provide additional information describing how the GSA will perform the monitoring prescribed in its GSP and how any missed measurements over the water year still allow

⁷ 2024 Corning Annual Report, Table 5.2, p p. 39-40.

⁸ <https://sgma.water.ca.gov/SgmaWell/>.

⁹ 23 CCR § 354.34 (c)(1)(B).

¹⁰ 2024 Corning Annual Report, Table 5.2, pp. 39-40.

the GSA to monitor impacts to beneficial uses or users of groundwater,¹¹ understand conditions relative to measurable objectives and minimum thresholds,¹² quantify water budget components across the Subbasin,¹³ and represent and assess seasonal low and seasonal high groundwater conditions in the basin or plan area,¹⁴ in the next annual report. Based on the issues identified above, the additional information that must be submitted in all future annual reports includes a detailed field plan or program to perform required monitoring and prevent missed measurements during future sampling events to avoid the creation of new or additional data gaps within the monitoring network. This may include replacing inaccessible or damaged wells.

Please contact the assigned DWR basin point-of-contact or sgmps@water.ca.gov if you have questions about this notice or the annual reporting process. The Department looks forward to receiving your Water Year 2025 Annual Report by April 1, 2026.

Thank You,

Paul Gosselin

Paul Gosselin
Deputy Director
Sustainable Groundwater Management

¹¹ 23 CCR § 354.34 (b)(1).

¹² 23 CCR 354.34 (b)(2).

¹³ 23 CCR 354.34 (b)(3).

¹⁴ 23 CCR 354.34 (c)(1)(B).