TEHAMA COUNTY GROUNDWATER COMMISSION

Board Chambers
Tehama County Board of Supervisors Chambers
727 Oak Street, Red Bluff, CA 96080
https://tehamacounty.legistar.com/Calendar.aspx

AGENDA FOR WEDNESDAY, SEPTEMBER 10, 2025

8:30 AM

Commissioners: Martin Spannaus, City of Corning; Jeff Godwin, City of Red Bluff; Hal Crain, City of Tehama; Kris Lamkin, El Camino Irrigation District; Todd Hamer, Los Molinos Community Services District; Martha Slack, Rio Alto Water District; Liz Merry District 1; Adam Englehardt, District 2; Seth Lawrence, District 3; Michael Ward, District 4; David Lester, District 5;

Justin Jenson, Flood Control/Water Resources Manager; Lena Sequeira, Administration

This meeting conforms to the Brown Act Open Meeting Requirements, in that actions and deliberations of the Groundwater Commission, created to conduct the people's business are taken openly; and that the people remain fully informed about the conduct of its business. Any written materials related to an open session item on this agenda that are submitted to the Clerk less than 72 hours prior to this meeting, and that are not exempt from disclosure under the Public Records Act, will promptly be made available for public inspection at Tehama County Flood Control and Water Conservation District, 1509 Schwab Street, Red Bluff, CA 96080 during normal business hours.

Call to Order / Pledge of Allegiance / Introductions

Public Comment

This time is set aside for citizens to address this Board on any item of interest to the public that is within the subject matter jurisdiction of this Board provided the matter is not on the agenda or pending before this Board. Each agenda item will have an opportunity for public comment at the time the item is called. Persons wishing to provide public comment are asked to address the Board from the podium. The Chair reserves the right to limit each speaker to three (3) minutes. Disclosure of the speaker's identity is purely voluntary during the public comment period.

For audio and real-time commenting via phone:
(530) 212-8376, conference code 142001. Press 5* on your phone keypad to raise your hand

to comment.

For live audio of the meeting:
Go to: https://tehamacounty.legistar.com/Calendar.aspx

1. APPROVAL OF MINUTES 25-1574

a) Waive the reading and approve the minutes of the regular meeting held 7/9/2025

2. Annual Report Letter Corning Subbasin WY2024 25-1573

To present the letter for review and group discussion.

3. Presentation on Volumes for Fee Setting 25-1580

To have a discussion on the material and receive feedback.

4. Review of Draft Proposed to Demand Management Program Along with Current Status in Working Group 25-1584

To review and discuss next steps.

5. Standing Agenda Items 25-1567

1. Groundwater Recharge
2. Grant Status
3. Demand Management Plan Working Group Update
4. Well Mitigation Plan Working Group Update
5. Annual Report Status
6. Outreach

6. Commission Matters

Adjourn

The County of Tehama does not discriminate on the basis of disability in admission to, access to, or operation of its buildings, facilities, programs, services, or activities. Questions, complaints, or requests for additional information regarding the Americans with Disabilities Act (ADA) may be forwarded to the County's ADA Coordinator: Tom Provine, County of Tehama, 727 Oak St., Red Bluff, CA 96080, Phone: (530) 527-4655. Individuals with disabilities who need auxiliary aids and/or services or other accommodations for effective communication in the County's programs and services are invited to make their needs and preferences known to the affected department or the ADA Coordinator. For aids or services needed for effective communication during Groundwater Sustainability Agency Groundwater Commission meetings, please contact the ADA Coordinator prior to the day of the meeting. This notice is available in accessible alternate formats from the affected department or the ADA Coordinator.

Tehama County

Agenda Request Form

File #: 25-1574 **Agenda Date:** 9/10/2025 **Agenda #:** 1.

APPROVAL OF MINUTES

Requested Action(s)
a) Waive the reading and approve the minutes of the regular meeting held 7/9/2025

Financial Impact:
None

Background Information:

Tehama County
Wednesday, July 9, 2025 8:30 AM
Groundwater Commission
Meeting Minutes

Tehama County Board of Supervisors
Chambers
727 Oak Street, Red Bluff, CA 96080
https://tehamacounty.legistar.com/Calendar.aspx
Board Chambers

8:30 AM Call to Order / Pledge of Allegiance / Introductions

Present Commissioner Todd Hamer, Commissioner Martha Slack, Commissioner Kris Lamkin, Commissioner Michael Ward, Commissioner Seth Lawrence, Commissioner Martin Spannaus, Commissioner Adam Englehardt, Commissioner David Lester, and Commissioner Liz Merry

ABSENT Commissioner Hal Crain, and Commissioner Jeff Godwin

Public Comment
None

3. APPROVAL OF MINUTES - Clerk & Recorder Lena Sequeira **25-1227**

Waive the reading and approve the minutes of the regular meeting held 5/7/2025

RESULT: APPROVE
MOVER: Seth Lawrence
SECONDER: Martha Slack
AYES: Commissioner Hamer, Commissioner Slack, Commissioner Lamkin, Commissioner Ward, Commissioner Lawrence, Commissioner
Spannaus, Commissioner Englehardt, Commissioner Lester, and Commissioner Merry
ABSENT: Commissioner Crain, and Commissioner Godwin

4. Presentation on Long Term Funding Strategies 25-1226

Deputy Director Justin Jenson provided a presentation on fee structures. The presentation focused on identifying the methodology the group would recommend to the board for charging extraction fees.

He noted that compliance with the water code is the primary objective. Discussion centered on fee methodology, with emphasis that imposing extraction fees is the most common theme in both regulation and law.

Jenson reminded the group of the state's fee schedule should the state administer the program, along with the associated costs.

Jenson reviewed long-term fee projections, noting they are broad estimates subject to change as discussions continue, but provide a general financial range. He outlined the various options and associated fees. Jenson also highlighted the schedule for placing fees on the tax roll, presenting a step-by-step timeline to meet the July 2026 deadline. It is anticipated that public hearings and a voting process will be required.

Discussion also addressed whether wellhead fees were included in the presentations fee outline.

Jenson stated that certain things must happen regardless of how much water is used in the county.

There was discussion on the need for two different matrixes and the possible necessity to manage extraction outside the basins.

Commissioner Slack asked if these will be classified as a mandated charge.

Jenson responded stating that there are two ways data is collected showing who gets water from municipal and who gets water from groundwater extraction. The decision of how to charge will have to be made and there will be two ways of doing so. The first would be to independently charge on the tax roll. The second would be to charge the municipality then they would charge their customers. There will be a discussion with attorneys before bringing any of that forward.

Commissioner Lamkin stated that this would be a heavy lift of data and customer service, she asked if there was a plan for staffing.

Jenson responded clarifying that part of what we talk about with long term fees includes that staffing portion. There will be more discussion going forward on staff requirements.

There was discussion on well head fees, fees vs use and how often fees should be assessed.

Jenson stated that it would be most beneficial to assess fees every five years.

Commissioner Hamer stated his opinion on the five year window saying that gives us a chance to know what we would be dealing with.

Jenson agreed that it would give a more reasonable forecast of cost.

Hamer asked if all fees would go through the 218 process.

Jenson responded, stating that some most likely will, but not all. Ultimately we will have the fee experts weigh in on that and give advice.

Hamer mentioned that if the fees do go through 218 then the whole process has to be done all over again.

Jenson said that is another reason to have the five year durations.

Englehardt asked if this was the precedent for other GSA's with a similar system

Jenson answered stating that generally yes, this is the type of system exists.

There was discussion on the basic structure as well as fee structures compared to other basins.

There was a request to see examples from other basins and show the structure for insight.

Jenson stated that they will be doing this throughout the entire process. The agencies have different authorities so that will also need to be factored in. He stated that they will choose agencies similar to ours and go over the different details.

Jenson reiterated that what he is looking for is some sort of consensus to review this and move to the next step.

There was discussion on the chart being presented and the fees to be charged.

Commissioner Lester asked how irrigated acers are mapped.

Jenson confirmed that initially we will use what was collected during well registration. Ultimately in the long run if you did not register, you will get charged for an assumptive use. The assumed use will be based on crop type and how much water it takes to water that crop type.

Englehardt asked about Land IQ, this is a program that he is familiar with and it seems to be accurate.

Jenson stated that they want to use Land IQ, but it is pricey. The money needs to be used wisely so if they do go with them, it might be an every five years scenario.

There was discussion on cost relating to Land IQ and the frequency of needing the service.

Hamer commented that part of what it will come down to is land-owner and buy in. If they are willing to cooperate, we will get more legitimate numbers.

Public Comment

A resident stated their opinion on cost versus profit for farmers. They had concerns for their AG wells since they only use them one or two times per year and wanted to know how these fees would affect them.

Commissioner Hamer asked The Commission if they approved the fee schedule.

5. Standing Agenda Items **25-1197**

1. Groundwater Recharge
   Jenson noted that the topic had been briefly discussed earlier. He stated that it will be important to determine the legal extent of access to water for recharge. Independent counsel has been contracted to conduct a review. The review will address potential sources of water and the rights required to secure and use that water.

2. Grant Status
   Eddy Teasdale provided an update on the grant status. He informed the group that the periodic evaluation is due in August 2027, and a determination will need to be made on the path forward. DWR is currently completing another multi-completion well in Los Molinos, which will provide additional data collection opportunities.

   Teasdale reviewed the tasks associated with the 2027 periodic evaluation and highlighted the need for a model update. He noted that the Corning Subbasin uses a different model than Tehama, and there is interest in integrating the two. Input will be needed on which model to pursue. A pros-and-cons memo has been prepared and sent to Lisa and Justin for review prior to presentation to the group.

   Jenson reported on a meeting he attended at Rolling Hills Casino regarding a planned construction project. The project includes a water feature that could potentially serve as a recharge site in the future. He noted this could be beneficial given existing water issues in the area.

3. Demand Management Plan Working Group Update
   Jenson stated that the STRAW proposal was the topic of the last meeting. Time was spent going over that the majority of the meeting and he briefly explained how the outline worked.

   There was discussion on timeline for the STRAW proposal and what some specific scenarios might look like.

4. Well Mitigation Plan Working Group Update
   Working on getting the first meeting scheduled to get input on the finer details.

5. Annual Report Status
   The annual report is completed and they are gathering
   the data to put into the five year plan while there are still funds in the grant.

6. Outreach
   Jenson talked about the presentation he gave in Los Molinos through the cooperative extension. He also touched on that they have been discussing sending out informative flyers that would be something like a questionnaire.

   There was discussion on the tech memo related to Demand Management and the use of unused water in the county.

   Teasdale talked about a meeting coming up with the RCD to utilize grant dollars for grower outreach to do some pilot testing.

Commission Matters

None

Adjourn

9:33 AM

Tehama County

Agenda Request Form

File #: 25-1573 **Agenda Date:** 9/10/2025 **Agenda #:** 2.

Annual Report Letter Corning Subbasin WY2024

Requested Action(s)
To present the letter for review and group discussion.

Financial Impact:
Unknown

CALIFORNIA DEPARTMENT OF WATER RESOURCES
SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE
715 P Street, 8th Floor | Sacramento, CA 95814 | P.O. Box 942836 | Sacramento, CA 94236-0001

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 table[7] 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 regulations[9] 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).

Tehama County

Agenda Request Form

File #: 25-1580 **Agenda Date:** 9/10/2025 **Agenda #:** 3.

Presentation on Volumes for Fee Setting

Requested Action(s)
To have a discussion on the material and receive feedback.

Financial Impact:
Unknown

Background Information:
Third presentation for fee setting information.

Assumed Volumes

WHAT CAN WE DIVIDE FEES ACROSS?

How Many Wells/Connections Are In the Basins?

- Approximately 2,000 AG/Commercial wells
- Approximately 9,000 Domestic wells
- Approximately 11,000 Connections to water service

How Much Land is in the Basins?

- Total acres Approximately 720,000
- Irrigated Acres Approximately 125,000
- Approx. Acres By Crop Type:
  - Almond/Pistachio 30,000
  - Walnuts 45,000
  - Olives 11,000
  - Fruits/Grapes 8,000
  - Vegetables 1,000
  - Pasture/Alfalfa 20,000
  - Other/Unknown 10,000

How Much Groundwater Is Used In The Basins

- Agriculture Uses Approximately 300,000 Acre-feet
- Domestic Uses Approximately 16,000 Acre-feet
- Other Uses are likely less than 1,000 Acre-feet

How Many Parcels Are In the Basins?

- There are over 40,000 parcels in Tehama County
- More than 25,000 parcels are in the basins
- Most of the 25,000 parcels are in urban or residential areas

Tehama County

Agenda Request Form

File #: 25-1584 **Agenda Date:** 9/10/2025 **Agenda #:** 4.

Review of Draft Proposed to Demand Management Program Along with Current Status in Working Group

Requested Action(s)
To review and discuss next steps.

Financial Impact:
Unknown

Background Information:
Demand Management Working Group has been giving input on potential program for approximately one year. This is an overview of Documents that have come from those discussions along with current draft program proposal by staff.

Options For Incentivized Demand Management

- **Fallowing:** Reduction in total irrigated production acreage. Conversion to non-irrigated use such as grazing, dry crops, or recharge basin. Or land simply left undeveloped.
- **Crop Diversification:** Changing all or some irrigated land to crops that require less water. Almonds to olives may save 1 ac/ft per acre. Walnuts to olives may save .5 ac/ft per acre. Almonds to melons/squash may save 1.9 ac/ft per acre.
- **Replant Extension:** This is the temporary equivalent of fallowing. Extends the time between removal of old crop and planting of new, creating a period when irrigation is not required.
- **Irrigation Efficiency:** Reduces demand by lowering the water required to produce a crop. Includes irrigation type, coverage patterns, soil moisture probes, scheduling, ET monitoring and others.
- **Use of Surface Water VS Groundwater:** Promotes the use of all available surface supplies prior to the use of groundwater.
- **Soil Improvement:** Addition of various chemical, organic and inorganic amendments that reduce the amount of water required to produce a crop.

There are two ways to offer incentives for the above activities. The District could either charge a fee to all users (could be on a countywide, basin wide or areawide basis) and use those funds to offer programs and incentives, or the incentive to do these activities could be fee avoidance.

If the District charges a fee and runs the programs and incentives then a set amount would be added to the base GSA fee. The Board of Directors would approve program budgets and set conditions for acceptance into the program. District Staff or contractors would oversee the outcomes in the field and the District would have parameters to measure reduction.

In the fee avoidance scenario, the user would get a break on their fees for doing one of the above activities. Certain programs would require less funding if there is less risk of overdraft and less fees would be required for projects to offset overdraft. The fee avoidance method fits well with the point of demand management, those who choose to do a reduction activity naturally lower their per acre foot cost associated with SGMA compliance and also benefit from lower programmatic fees while having the freedom to choose the activity that works best for them.

Because the District will likely be using assumptive use fees (no metering required but would be optional), things like Fallowing, Crop Diversification and Replant Extension would be straightforward math to determine the reduction. The others would require either a meter to prove use below assumptive groundwater volume or metering of surface water in order to subtract from assumptive volume.

Tehama Groundwater Demand Management Working Group

Issues Overview | August 2025

CONTENTS

SECTION I

Context and Overview

CBI is tasked with developing two overview memos related to the Working Group/Ad Hoc. The first one (this document's content) aims to capture key issues at a mid-point in the process.

Potential Outputs (subject to change)

Step 1) Working notes

1. Summary of WG activities (refer to meeting outcomes tracker)
2. Key issues/topics, areas of support, other key discussions (This document)
3. Proposed responses by staff/consultants (including impacts of the proposed DM program), Ad Hoc, WG feedback

Step 2) Overview summary to present to the Commission and BOD

1. Key issues and topics
2. Areas of emerging broad support, some support, and still needs discussion
3. Proposed Responses
    a. Recommend approach (if applicable)
    b. Next Steps (priority level, timeline for addressing)

Ad Hoc / Working Group Discussion

- Are the categories of issues and topics below accurately capturing the WG's perspectives?
- Are the emerging areas of support, some support, and needs further discussion accurate?
- Among the "needs further discussion" and "some support," what are the priorities?

- How does the group(s) want to address these?
- Do the scenarios reflect the top priorities?

Categories of issues and topics

1. **Technical Design**
    a. Polygon approach (boundaries and groupings)
        i. Thiessen v. hydrogeologic representation
    b. Trigger mechanisms (MOs vs. MTs)
2. **Other Data and Technical Issues**
    a. Safe Yield and Sustainability Yield Calculations
    b. 10-year rolling average application
    c. Model assumptions accuracy (irrigated acreage, surface v. groundwater,
3. **Implementation Timeline**
    a. 2031 too soon to see projects' effectiveness (e.g., recharge)
    b. 5-yr review cycles too long before modifications may be necessary
    c. Jan 2026 deadline
        i. Feels rushed for adequate informed decision-making on DM specifics.
4. **Credits and Incentives**
    a. Recharge credit mechanism
    b. Potential for recharge and in-lieu surface water (beyond the SGMP Round 2 grant)
5. **Flexibility mechanisms**
    a. Defining an appeals process
    b. Non-contiguous polygons management
    c. Non-contiguous parcels management
    d. Allocation trading with polygon groupings
    e. Lease provisions for retiring farmers
6. **Economic impacts**
    a. Lack of robust economic analysis, including secondary economic impacts
    b. Unclear funding mechanisms and fees
7. **Legal / Regulatory**
    a. Legal review not yet complete
    b. Some ambiguity about what the State will find satisfactory

Acknowledging the Underlying Tradeoff Challenges

Why is this hard? **Fairness** and **success** mean different things for different people

- **Perfection vs. progress**
- **Careful development vs. urgent problems**
- **Calculations vs experience**
- **Simplicity vs tailored**

- **Keeping costs low vs. ensuring acceptable management**
- **Precautionary buffers vs. operational flexibility**

(compiled below, as the opinion may change depending on the topic):

- "We'll never have perfect data; we know enough to move forward"
- "Uncertainties are too high; we may get locked into a flawed system"
- "Moving too fast risks making poor decisions"
- "We're already having groundwater problems or they're in the near future"
- "Objective calculations/models reduce bias"
- "The calculations don't match what we've experienced"
- "The same rules should apply to everyone"
- "Match the management to the situation"
- "We can't afford to pay"
- "To do this right, we all need to pay our fair share"
- "Build in a safety net to avoid the worst case scenario"
- "Too many restraints will bankrupt farmers (and small farms affected first)"

SECTION II
Areas of Emerging Support

A. Core Principles

a. Flexibility to adapt to conditions
b. Local control vs. state intervention
c. Support individual choice in meeting water usage goals
d. Protect what makes Tehama home (protecting small farms, rural residents, etc.)
e. Completely unchecked development will likely lead to Undesirable Results
f. Aim for fairness across all groundwater uses
g. Minimize costs (and fees)
h. Leverage existing programs and partnerships (e.g., outreach)
i. Regulatory compliance (SGMA) and legally defensible

B. Program Elements

j. Incentive-based approaches before restrictions
k. Regular reviews
l. Flexibility to modify (e.g., potential water trading program)
m. No one-size-fits-all, broad management actions (manage where the problem is)
n. Reward efforts for recharge, conservation/water efficiency, in-lieu surface water
o. Formal appeal mechanism

C. Technological Improvements

p. There are important information gaps to address (a more detailed workplan is needed)
q. Incorporating better data is a top priority

i. Expand the monitoring network and RMS wells

r. More information to understand impacts

s. Comprehensive review and updating Measurable Objectives (MOs)

t. Clear documentation on methodologies and readily accessible

Some Support or Acknowledgment, but Still Have Concerns

(e.g., questions for clarification to better understand)

A. Hybrid model balance b/w incentives and allocations

a. Support

i. In addition to incentives, an allocation framework is needed (per Board direction and GSP commitments).

b. Concerns

i. The balance between carrot and stick approach isn't clear

B. Polygon framework

a. Some support

i. Thiessen is a good starting point due to its objective methodology and in the absence of more accurate data

ii. Managing by polygons and combining polygons has value (details on approach still needs discussion)

b. Concerns

i. It doesn't reflect hydrogeologic reality well

1. Range of opinions on this too – perhaps AEM can provide information up to a certain depth [maybe 300-600ft]. AEM will be included in the model update (new model expected by the end of 2026)

ii. Hard to fully support when we don't have the specifics on triggering thresholds and polygon boundaries

C. Implementation timeline

a. Some support

i. 2031 aims to balance urgency to address the groundwater problems and being flexible to fine-tune and address key unknowns and give farmers time to prepare

ii. Acknowledge that a program needs to have enough detail for the BOD and State review (GSP commitments)

b. Concerns

i. The data might not be updated before restrictions (fees) are triggered

ii. 2031 is still too soon to know if projects are successful and partners' timelines (e.g., irrigation districts may need 3-4 years to implement plans for underutilized surface water); program needs to be designed to acknowledge these different timelines

iii. Unclear what's "enough detail"
iv. Risk of making regretful decisions if pushed too quickly
v. Does that keep us on track to meet 2042 sustainability goals?

D. Fee-based triggers

a. Some support
   i. Conceptually, support utilizing fees before restrictions
b. Concerns
   i. Problematic MOs
   ii. Alternatively, use the MTs (also problematic)
   iii. Hard to make recommendations without cost estimates

E. If developed a Water trading program

a. Benefits
   i. Supports individual decision-making
b. Concerns
   i. Too complex to get it right by Jan 2026; therefore, wanting a placeholder in the workplan
   ii. Are there risks of "robbing Peter to pay Paul?"

F. Economic considerations

a. Some support
   i. Agree that an economic analysis is important
b. Concerns
   i. Level of detail, who pays, and when will it be completed?

Needs More Discussion

(Who will discuss, when, and how is TBD)
(e.g., Identifying some topics will not be fully fleshed out by Jan 2026, but flagging next steps)

A. Polygon Methodology

a. Benefits
   i. Creating management options that match the groundwater problems
   ii. Set up to automatically update with new data rather than flawed review (uninformed, biased)
b. Concerns
   i. Geographic logic to the groupings (the like attributes)
   ii. Noncontiguous polygon management

B. Water portfolio management flexibility

a. Benefits
   i. As long as within an appropriate area (e.g., polygon group), individual can choose to pump less or more

b. Concerns
    i. Hard to track and risk of accidentally creating new problem areas

C. Managing development.

a. Unclear what mechanisms are available to the GSA to prevent new pumping in stressed areas (e.g., General Plan update/amendment, zoning, etc.)

D. Legal review

a. Needing some legal review of the potential management actions and alternative options (e.g., SGMA management areas or conceptually similar)
b. Staff hoping to receive initial legal review by Sept 10 Commission meeting

E. Other topics

a. Consideration of less discussed topics mentioned in SGMA (e.g., potential impacts to GDEs)
b. Monitoring, tracking, and evaluating progress. How do you "know" if you can't directly measure.
c. Enforcement logistics (lag b/w detecting an issue, confirming, and addressing)
d. Building in "what if" scenarios and contingency approaches (e.g., dry well mitigation program)
e. Tracking State priorities and evaluation *(Observing that DWR and State Board have been increasingly stringent)*

SECTION III
Specific Scenarios

Scenarios intended to explore likely (or existing) situations that cover multiple issues of concern; help "stress test" the proposed approaches and alternatives.

A. Upstream-downstream influence (per Steve, Bill)

a. Capay area has steady GWL decline, but no new development in years
b. Significant orchards upstream insinuate upstream pumping is the cause of Capay's GWLs
    i. (vice versa situation is also a concern: "downstream" pumping pulls the GWLs impacting the "upstream" area)
c. These two might end up being in different polygon groupings
d. (also related to interbasin boundary)
e. Concerns/Questions
    i. Unfair that existing farms (particularly small farms) are penalized by unchecked new development/land-use changes
    ii. Unfair for Capay to have pumping restrictions due to another polygon group's overpumping
    iii. Under what conditions, might new development or land-use conversion

move forward that would exceed the Sustainability Yield thresholds and trigger DM actions?

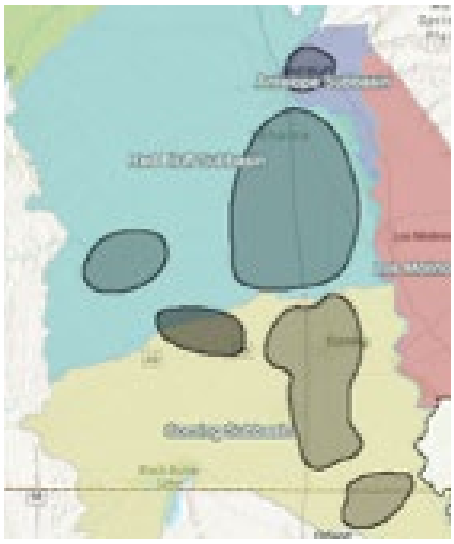
iv. Are there data sources that can help us understand what's occurring underground (e.g., maybe AEM?)

B. River-Adjacent (per Bill)

a. Bill's inland well (a couple miles from Sac River) is showing declining water levels; whereas his production wells near the river (<1 mile) have stable levels.
b. Both sets of wells are in the same polygon grouping (per the current SY calculations)
c. Specific nuance: Bill's inland well has an inaccurate MO that needs correcting in the near future
d. Concerns/Questions
   i. If the inland well dropped below the MO, would that trigger DM actions?
   ii. Would Bill have to pay fees based on the inland well (even though his wells by the river are stable)?
   iii. Would the inaccurate MOs and new polygon designations be adjusted in time such that Bill wouldn't experience the above scenario?
e. Potential response:
   i. If outlier: appeal process, compare to hydrographs, possible exemption, and potential add to monitoring.

C. Non-contiguous polygons (per Ian and Steve)

a. Polygon Group A and Polygon Group X have the same Sustainability Yield threshold (e.g, 2.5 AFY).
   i. Group A is not geographically near Group X,
   ii. Group X is embedded within Grouping Y
   iii. Group Y has a different Sustainability Yield threshold (e.g., 3 AFY) than Group X or A
b. The image below is only meant to help envision potential scenarios; it does not reflect any proposed management designation

c. 

d. Concerns/Questions

i. If groundwater levels decline in Group X and trigger DM actions. Would Polygon A also be triggered and face the same restrictions?

ii. Shouldn't management also focus on the surrounding Group Y (supply augmentation and/or demand management) that may affect conditions in Group X?

iii. Is it possible for two non-contiguous groupings to have the same Sustainability Yield threshold calculation but be hydrogeologically different (GWLs fall in one, but not in the other)

e. Potential response:

i. The likely scenario is that GW levels would be falling in both groups, even though they are not geographically connected

D. Non-contiguous parcels (per Ian and Hal)

a. Split operations within the same polygon, but non-contiguous parcels

b. Retiring farmer has an orchard that's still productive and wants to lease it to another farmer.

c. Concerns/Questions

i. Can't reduce pumping on one parcel to allow increase pumping on another, noncontiguous parcel.

ii. Landowners want the flexibility to manage their overall water portfolio based on the overall benefit and sustainability of the subbasin.

iii. Farmers don't have economic and management flexibility that still stays within the Sustainability Yield thresholds.

E. Boundary spanning edges (intra-/inter-basin management) (per Michael)

a. His property spans Thomes Creek in both Red Bluff and Corning Subbasins.

b. Different Sustainability Yields in different basins and DM Programs operating on

different timelines

c. Concerns/Questions

i. What's the risk that Red Bluff side of Thomes Creek would face restrictions but the Corning side doesn't?

ii. Hard to manage water portfolio holistically (watershed approach)

F. Credits for recharge, conservation/efficiencies (per Hal)

a. Recharge effects may take longer than 5 years

b. Farmer who has greatly reduced their water use or invested in recharge projects should get credit

c. Concerns/Questions

i. Concern if there isn't credit for reduced use while someone else in the same polygon grouping got to pump as they pleased.

ii. Concerned that areas might trigger DM restrictions unnecessarily when the local recharge project(s) needed 7-10 yrs to demonstrate success.

iii. Challenging to demonstrate (quantify) the benefit to the aquifer (technical and legal considerations at play)

d. Potential response

i. Appeals process, prove adding a certain amt of water back to the aquifer (e.g., ASR)

ii. Refer to options for incentives document

iii. This issue is being played out at state level too

Definitions

Calculated Sustainable Yield: The average safe yield of the polygons in a combined safe yield area (af) divided by the total irrigated acres within a combined safe yield area (af/ac). For the purpose of Groundwater Demand Management, Calculated Sustainable Yield will be updated every 5 years.

Combined Safe Yield Area: The grouping of polygons in relation to their estimated quantity of groundwater that can be extracted. In each managed subbasin polygons within the same range (af) of safe yield will be grouped together for the purpose of demand management. The ranges are: -5000 or less, -5,000 to -1,000, -1,000 to -500, -500 to 500, 500 to 1,000, 1,000 to 5,000, 5,000 to 50,000, 50,000 to 100,000, 100,000 to 500,000 and greater than 500,000.

Demand Management: GSA actions, rules or programs that are intended to avoid minimum thresholds, prevent undesirable results, and incentivize long-term sustainability by reducing the pumping of groundwater.

GSA: Groundwater Sustainability Agency. The Flood Control and Water Conservation District is the GSA for Tehama County.

GSP: Groundwater Sustainability Plan. Each managed subbasin in Tehama County has an associated GSP.

Management Action: A specific action taken by the GSA to reduce the use of groundwater.

Measurable Objective: (MO) As defined in each subbasin GSP.

Minimum Threshold: (MT) As defined in each subbasin GSP.

Polygon: Flat, two-dimensional shape bounded by straight lines. For the purpose of Groundwater Demand Management, polygons are the specific areas by which the resource is managed and are created using the Thiessen method surrounding (a single point) RMP/RMS.

RMP/RMS: Used interchangeably within the various GSPs, Representative Monitoring Points or Representative Monitoring Sites are facilities that are monitored for groundwater level at least twice per year (spring and fall). RMP/RMS are the single point used in the creation of Thiessen Polygons. Prior to December 30, 2030, and reviewed in five-year intervals thereafter, the Tehama County Flood Control and Water Conservation District Board of Directors, based on recommendations from the Groundwater Commission and staff, will ratify by resolution a network of RMP/RMS, with appropriate MO and MT, for the purpose of Groundwater Demand Management. RMS/RMP should contain 10 years of somewhat consistent monitoring.

Safe Yield: The estimated quantity of groundwater (in af) that can be safely extracted in a polygon. Safe Yield is calculated as average pumping +/- average change in storage. For the purpose of Groundwater Demand Management averages are 10-year rolling ending with the previous water year data.

Target Assumed Maximum Pump Rate: Each Groundwater use type (ex; crop variety, commercial, residential etc.) will be assigned, as part of the GSA fee structure and prior to December 30, 2030, an assumed pump rate (af/ac). The use type assigned with the highest assumed pump rate will be the Target Assumed Maximum Pump Rate. Any assumed pump rate can be replaced with actual reported volume via meter.

Trigger: A set point at which a Demand Management Action is initiated.

Fees And Actions Associated With Trigger based Demand Management

In the interest of achieving sustainable groundwater extraction within all Subbasins partially or entirely within Tehama County. The Flood Control and Water Conservation District (District), acting as the GSA, has created a secondary level of demand management, consisting of two Management Actions, to be adopted immediately but become effective on January 1, 2031. This will allow the primary method of demand management, incentive based demand reduction, to be initiated and tested.

Management Action Number 1 is intended to reasonably distribute the costs of more intensive administrative actions, by the District associated with persistent groundwater overdraft in defined areas. Examples of these costs are automated monitoring systems for RMP/RMS sites, increased efficiency and reduction measures, study, design and implementation of other project and management actions along with public education on next steps. It is assumed that an increase in the cost to manage groundwater along with greater action by the District will result in less total extraction.

Management Action Number 2 is a legal restriction on extraction greater than the calculated sustainable yield. This action will result in reduced extraction by ordinance. By recalculating the sustainable yield on a five year basis it creates flexibility and allows for the application of new data as it is collected.

The ordinances for both management actions will have a means for the effected party to contest them.

This program does not address water trading, except contiguous parcels as would be allowed in current Tehama County water use ordinances. A separate water trading ordinance will be adopted by the District Board of Directors prior to December 30, 2030.

Management Action Number 1: Reduce Use of Groundwater When Groundwater Levels Decline Below Measurable Objectives. The following management action will reduce the likelihood of undesirable results related to the chronic lowering of groundwater levels, reduction in groundwater storage, and land subsidence through increased administrative action by the GSA. This management action will take place in a series of steps according to how far groundwater levels deviate from the measurable objective.

Step 1: If greater than 20% of the annual range (spring maximum measurement to fall minimum measurement) of groundwater elevation declines below the measurable objective levels established at 50% or more of the RMPs for two consecutive years in a combined safe yield area, then the target assumed maximum pump rate (af/ac) will be reduced by ten percent (10%). All measured or assumed pumping greater than the target assumed maximum yield will incur an increased administrative fee as detailed in the Tehama County Flood Control and Water Conservation District groundwater management fee structure.

Step 2: If greater than 40% of the annual range (spring maximum measurement to fall minimum measurement) of groundwater elevation declines below the measurable objective levels established at 50% or more of the RMPs for two consecutive years in a combined safe yield area, then the target assumed maximum pump rate (af/ac) will be reduced by 20 percent (20%). All measured or assumed pumping greater than the target assumed maximum yield will incur an increased administrative fee as detailed in the Tehama County Flood Control and Water Conservation District groundwater management fee structure.

Step 3: If greater than 80% of the annual range (spring maximum measurement to fall minimum measurement) of groundwater elevation declines below the measurable objective levels established at 50% or more of the RMPs for two consecutive years in a combined safe yield area, then the target assumed maximum pump rate (af/ac) will be reduced by forty percent (40%). All measured or assumed pumping greater than the target assumed maximum yield will incur an increased administrative fee as detailed in the Tehama County Flood Control and Water Conservation District groundwater management fee structure.

Step 4: If greater than 100% of the annual range (spring maximum measurement to fall minimum measurement) of groundwater elevation declines below the measurable objective levels established at 50% or more of the RMPs for two consecutive years in a combined safe yield area, then the target assumed maximum pump rate (af/ac) will be reduced by eighty percent (80%). All measured or assumed pumping greater than the target assumed maximum yield will incur an increased administrative fee as detailed in the Tehama County Flood Control and Water Conservation District groundwater management fee structure.

Administrative activity is expected to decrease as groundwater levels increase. If groundwater levels recover to a higher step (lower in number) for two consecutive years, then the target assumed maximum pump rate will be adjusted to that step. If Groundwater levels rise above the measurable objective for two consecutive years, then the target assumed maximum pump rate will be removed entirely.

Upon adoption of this Demand Management Plan, the Board of Directors of the Tehama County Flood Control and Water Conservation District will, within 180 calendar days, adopt an ordinance creating the steps outlined above and initiating the process to place fees for increased administrative actions required due to falling groundwater levels with a start date of January 1, 2031.

Management Action Number 2: Sustainable Yield Pumping. This action will occur in conjunction with action number 1 and is intended to prevent extraction above sustainable yield from causing undesirable results and sustained water levels below the measurable threshold.

If, over any two year period, in any RMP the groundwater falls below the Measurable Threshold of that RMP; the entire combined safe yield area containing that RMP will be restricted to the average safe yield of all polygons within the combined safe yield area. Independently of measurable threshold, if undesirable results, as defined in the GSP containing the combined safe yield area, occur at any time, within any combined safe yield area, the entire combined safe yield area will be restricted to the average safe yield of all polygons within the combined safe yield area.

The average safe yield of the combined safe yield area will be the calculated sustainable yield for the entire combined safe yield area and will be calculated as follows:

1. Each Thiessen Polygon within a combined safe yield area will be assigned a calculated total safe yield (acre-feet).

2. The calculated total safe yield will be divided by the total irrigated acres.

3. The resulting acre-feet/acre will be the safe yield in a polygon.

4. The safe yield for each polygon within a combined safe yield area will be added together and divided by the total number of polygons within the combined safe yield area.

5. The resulting number (acre-feet/acre) will be the calculated sustainable yield for the entire combined safe yield area.

6. The sustainable yield will be recalculated every five years starting January 1, 2031 to account for changes in land use and projects within the combined safe yield area.

Under Sustainable yield pumping, all groundwater extractors will be limited to the calculated sustainable yield, total acre-feet/acre for all acreage within contiguous Assessor Parcel Numbers, under one ownership, serviced by one or more extraction facilities. Total extraction may be either reported or assumed. Contiguous Assessor Parcel Numbers, under one ownership, that fall within multiple combined safe yield areas will fall under the most restrictive combined safe yield area.

If Sustainable Yield Pumping is triggered, it will remain in effect until three conditions are met: Condition 1, no existing undesirable results as defined in the GSP containing the combined safe yield area. Condition 2, a minimum of two years with groundwater levels in all RMPs within the combined safe yield (SY) area remaining above the Measurable Threshold. Condition 3, conditions for Step 1 of Management Action Number one are **not** met.

Upon adoption of this Demand Management Plan, the Board of Directors of the Tehama County Flood Control and Water Conservation District will, within 180 calendar days, adopt an ordinance creating an, up to, $500 per acre foot fine for all groundwater, either assumed or measured, extracted beyond the sustainable yield for all extractors within any combined safe yield area under sustainable yield pumping restriction.

Tehama County

Agenda Request Form

File #: 25-1567 **Agenda Date:** 9/10/2025 **Agenda #:** 5.

Standing Agenda Items

Requested Action(s)

1. Groundwater Recharge
2. Grant Status
3. Demand Management Plan Working Group Update
4. Well Mitigation Plan Working Group Update
5. Annual Report Status
6. Outreach

CALIFORNIA DEPARTMENT OF WATER RESOURCES
SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE
715 P Street, 8th Floor | Sacramento, CA 95814 | P.O. Box 942836 | Sacramento, CA 94236-0001

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 table[7] 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 regulations[9] 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).