



CALIFORNIA DEPARTMENT OF WATER RESOURCES

SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

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August 1, 2025

Justin Jenson
Red Bluff Subbasin – Plan Manager
9380 San Benito Avenue
Gerber, CA 96035-9701
jjenson@tcpw.ca.gov

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

Dear Justin Jenson,

As the basin point of contact for the groundwater sustainability plan (GSP) in the Red Bluff 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.

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 shortcomings related to the GSA's monitoring efforts and information obtained from that monitoring provided in this annual report.

The GSP indicates that the GSA has selected eight representative monitoring site (RMS) locations for the chronic lowering of groundwater levels. The annual report indicates the GSA performed spring (seasonal high) monitoring on five of the eight RMS wells, and fall (seasonal low) monitoring on four of the eight RMS wells. Additionally, data for two of the RMS wells (Site Code 400428N1221665W002: 11B02 Intermediate; and Site Code: 400428N1221665W001: 11B01 Shallow) has never been submitted to the Department's Monitoring Network Module. 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, Department staff request that the GSA 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 the GSA to monitor impacts to beneficial uses or users of groundwater,¹ understand conditions relative to measurable objectives and minimum thresholds,² quantify water budget components across the Subbasin,³ and represent and assess seasonal low and seasonal high groundwater conditions in the basin or plan area,⁴ 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.

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 prevent the Department from determining whether the Plan is being implemented in a manner that will likely achieve the sustainability goal for the basin, 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, a minor issue was noted during the review:

- The annual report's monitoring summary table⁵ 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,⁶ 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 regulations⁷ in future annual reports. Additionally, staff recommend

¹ 23 CCR § 354.34 (b)(1).

² 23 CCR 354.34 (b)(2).

³ 23 CCR 354.34 (b)(3).

⁴ 23 CCR 354.34 (c)(1)(B).

⁵ 2024 Red Bluff Annual Report, Table 5.2, p. 25.

⁶ <https://sgma.water.ca.gov/SgmaWell/>.

⁷ 23 CCR § 354.34 (c)(1)(B).

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.

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