

Supplemental Materials

Provided to SHAC Members in advance of the October 28,
2026 Meeting

(sent 10/23/2026 and 10/26/2026)

Subject: FW: Input on LML
Date: Friday, October 23, 2026 1:48:00 PM

Dear SHAC Members,

To add to the materials that are available to you in the SHAC packet, I'll be sending any other LML specific comments I receive prior to the SHAC meeting.

Please see Marty's email below which includes specific suggestions related to the LML language. She's agreed for me to share these directly with you.

Best,
Christina

BCC: SHAC Members
Marty Dunlap
Vina GSA Management Committee

From: Marty Dunlap
Sent: Friday, October 23, 2026 9:27 AM
To: Buck, Christina
Cc: Marty Dunlap
Subject: Input on LML

Hi Christina,
I know you are working on a proposal for the SHAC. I wanted to offer a few ideas:

The Strawman proposal describes the Local Management Criteria (LML) as a middle ground for monitoring Groundwater Dependent Ecosystem (GDE) sensitive areas. It is based on the Measurable Objective (MO), typically the historic low, with a 10-20 foot buffer. It seems prudent to expand the areas where LML are to be incorporated beyond the 5 GDE "sensitive" areas to include all 26 identified polygons. If there are sensitive GDE areas or domestic wells close by, monitoring should be conducted even when deep well pumping occurs and the data captured during the deeper pumping time periods.

Even though at some point this data may be excluded from reported

averages, it is important for the County to be aware of potential impacts at all points in time for nearby shallow well users. In the LML areas of greater sensitivity, the measurements should be taken more frequently than twice a year. LML should be introduced into the Chico Management Area (CMA). Since in the CMA there are generally higher MTs, the LML should be established at half the distance between the MO and the MT for each monitoring well.

The LML may be an acceptable compromise at this juncture but without any enforcement criteria, they are an ineffective substitute for a reasonably set Minimum Threshold (MT). As stated in the proposal, LML lack the “threat” of a regulatory hook. I understand that the threat is to the agricultural sector who engage in deep well pumping. To establish a comprehensive middle ground, there needs to be some type of “hook” instituted with the reaching of a LML which triggers a locally Planned Management Action (PMA).

The use of LML with a PMA trigger will assist in the monitoring and hopefully avoiding liability for over pumping to the detriment of beneficial users and uses of the groundwater. Additionally if the Interim Milestones (IM) could be reflected in the proposal you draft, I think there would be greater understanding on how the Department of Water and Resource Conservation plans to recommend on the implementation the Vina GSP.

Recommended PMA: If a LML is reached during a spring month monitoring, monthly measurements will ensue for subsequent months until the MO is achieved. Well owners within the polygon will be notified. If drawdowns continue for multiple months with no evidence of recovery, adaptive management strategies will be implemented. Demand reduction will be incorporated if multiple LML are reached in other Representative Monitoring Sites (RMS) that are in close proximity to each other.

We are all aware, the MT set across the Vina Subbasin is extraordinarily low. It is up to four times lower than that of the neighboring subbasins. Having a substantially lower MT, puts the Vina GSA at risk of incurring liability for mitigating losses to those within the Vina Subbasin with shallow wells and also for the degradation of the monetary value of landscaped residential properties with the loss of trees and other vegetation, as well as, for the drawing down of the groundwater of neighboring subbasins.

In summary, if the LML approach was to be implemented, it needs to include some kind a "hook" that contains a prescription for action to be taken by the Vina GSA Board. The PMA need not be viewed as a threat but as protection of the GSA in minimizing their liability and an allowance of concern for those who may not have the finances, the domestic well owners, or a voice, the GDEs. These entities are less capable in protecting themselves against the possible adverse impacts created by those with deeper wells who need to pump groundwater with vigor. The less capable entities require the protection of the GSA Board to make decisions for all the beneficial uses and users of the groundwater of the Vina Subbasin.

Please excuse the inconsistent formatting. Thanks for considering my suggestions.

Marty Dunlap



ROCK CREEK RECLAMATION DISTRICT

*A Butte County Reclamation District Operating Under Division 15 of the
California Water Code*

October 23, 2026

Board of Directors
Vina Groundwater Sustainability Agency
308 Nelson Avenue
Oroville, CA 95965

Re: Draft 2027 Periodic Evaluation and Draft Plan Amendments, Vina Subbasin

Dear Chair Rohwer and Directors:

The Rock Creek Reclamation District Groundwater Sustainability Agency (RCRD) submits these comments on the draft 2027 Periodic Evaluation and draft plan amendments. RCRD and the Vina GSA share one Groundwater Sustainability Plan (GSP) for the Vina Subbasin. This letter recaps our understanding of what has happened since the August 12 joint meeting, sets out RCRD's views ahead of the joint GSA Boards meeting in November, and submits more prescriptive, detailed language for the draft's Local Management Levels (LMLs) that we hope will help further define and strengthen this important management tool in the GSP.

What the Periodic Evaluation is for. The Department of Water Resources (DWR) approved the 2022 Vina Subbasin GSP on July 27, 2023. The task before both GSAs now is set by statute: "An evaluation of the plan shall focus on determining whether the actions under the plan are meeting the plan's management objectives and whether those objectives are meeting the sustainability goal in the basin" (Water Code § 10728.2). DWR's regulations for Periodic Evaluations ask the same question. The written assessment the GSAs send DWR "shall describe whether the Plan implementation, including implementation of projects and management actions, are meeting the sustainability goal in the basin" (23 CCR § 356.4). The charge is not to start from scratch or to redo the approved plan. It is to evaluate the plan and the subbasin's progress toward sustainability.

The subbasin is on track. The Water Year (WY) 2025 Annual Report, which both GSAs submitted in April 2026, checks groundwater levels against the plan's interim milestones (IMs) and finds that "Groundwater conditions in the Subbasin are on track to meet the first 5-year 2027 IMs and avoid undesirable results for groundwater levels at each of the RMS wells" (Section 5.2.1). The draft Periodic Evaluation agrees. Groundwater levels averaged 20 feet above the Measurable Objectives (MOs) and 71 feet above the Minimum Thresholds (MTs) in WY 2025, and "The subbasin remains on track to achieve its sustainability goal by 2042."

What has happened since August 12. At the August 12 joint meeting, the Boards directed staff to keep the MTs of the 2022 GSP (Alternative 1) and to add LMLs 20 feet below the MO at 14 of the 29 representative monitoring site (RMS) wells. Vice Chair Kimmelshue's amendment added direction for "very strong language as to what would happen if we hit the LMLs and what action would be taken if that happened." Both Boards also voted unanimously to amend the GSP to expand the RMS network to 29 wells. Both Boards directed staff to keep the non-dry-year provision, under which an undesirable result

for groundwater levels occurs when two RMS wells in a management area reach their MTs "for two consecutive non-dry year types": the Vina Board on a 3-2 vote, and the RCRD Board unanimously.

The draft Periodic Evaluation and draft amended GSP went out for public review in September, with comments due October 26. At its September 9 meeting, Vice Chair Kimmelshue asked, with support from Directors Hawley and Graydon, that staff return with the non-dry-year provision for more discussion, along with a new alternative that would raise the MTs.

On October 14, the Vina Board took up that alternative, Alternative 3, and it failed on a 2-3 vote. The August 12 direction on MTs stands. Vice Chair Kimmelshue asked that the LMLs be set at all wells, except for the Chico Management Area wells, 15 feet below the MO rather than 20, with stronger language on what happens when an LML is reached, and the Vina Board indicated its support. The Vina Board sent the MT alternatives, the LML level and language, and the non-dry-year provision to the Stakeholder Advisory Committee (SHAC) to consider together. It also voted 4-1 to direct staff to remove the non-dry-year provision.

One plan, two Boards. The October 14 direction on the non-dry-year provision departs from the August 12 joint direction. RCRD understands both as direction to staff on the drafts. Neither adopted the Periodic Evaluation or the plan amendments, and neither did the Vina Board's September 9 request to bring the non-dry-year provision and Alternative 3 back for discussion. Under the schedule staff described on October 14, the joint Boards will take these items up again in November and review the final documents in December. RCRD reads the final decision as resting with both Boards at that December meeting. RCRD's position is to keep the non-dry-year provision. RCRD and the Vina GSA adopted one plan together under their Cooperation Agreement of November 18, 2020. Under Section 3.5(b), each GSA has "the sole and absolute right, in its sole discretion, to ... Approve any portion, section or chapter of the GSP developed pursuant to this Agreement." Under Section 6.3, no GSA has "the right or power to bind any other Parties without such Parties' express written consent, except as expressly provided in this Agreement." RCRD reads these provisions to mean that a change to the shared plan needs the approval of both Boards. We appreciate Chair Rohwer's note on October 14 that the agreement calls for the Vina GSA's management committee to reach out to RCRD's management committee, and counsel's reminder that the Vina GSA is not the only agency that adopts this plan. RCRD shares Chair Rohwer's view that the two GSAs do better working through these questions together.

RCRD's views on groundwater levels. RCRD recognizes the Vina Board's October 14 direction to staff, which keeps in place the joint direction not to raise the MTs, and RCRD supports that direction. RCRD also supports keeping the non-dry-year provision, as both Boards directed on August 12. DWR's Corrective Action 3a asked the GSAs to "remove the non-dry year condition or discuss how extractions and recharge will be managed" (draft Periodic Evaluation, p. 3-4). The draft takes the second option: "The GSAs will manage groundwater extractions and recharge to ensure reductions in groundwater levels or storage during dry years are offset by increases in groundwater levels or storage during other years" (p. 3-5). RCRD supports Vice Chair Kimmelshue's call for stronger LML language and, consistent with his comments on October 14 and with Alternative 3, supports assigning LMLs to every RMS well except the Chico Management Area wells. The attached language uses the draft's 14 wells; RCRD supports extending LMLs to the remaining RMS wells. RCRD supports LMLs 20 feet below the MO, as the Boards directed on August 12.

Why RCRD supports 20 feet. At 15 feet below the MO, an LML could start investigations at water levels some wells have already reached in years when the subbasin was healthy. Of the 25 RMS wells in the North and South Management Areas, two have reached 15 feet below the MO since 2001 in DWR's

good-quality readings. Well 22N01E20K001M reached it once, in an October 2011 hand reading. Well 21N01E13L004M reached it on 22 days of automatic daily readings, all but one in June, July or early August of 2015, 2016 and 2021. An LML 20 feet below the MO would sit below every hand reading at those 25 wells since 2001.

In fact, well 21N01E13L004M, in the South Management Area, has an MO of 82 feet above sea level. It is not one of the 14 wells that have an LML in the draft; under Vice Chair Kimmelshue's proposal, it would get one. In 2015, its automatic daily readings fell to or below 67 feet, 15 feet under the MO, on eight summer and early fall days between June 14 and October 18. The draft's current rule starts an investigation when readings reach the LML and "persist through multiple observed groundwater measurements across differing seasons," so a 15-foot LML may have started an investigation at this well. At 20 feet below the MO, its automatic readings fell to or below the LML on only four days, in June 2015 and July 2016. In short, this is a healthy well. Every March and October hand reading since 2012 has been above its MO, through both the 2014-15 and 2021-22 droughts, and the March 2026 reading of 115.8 feet was about 34 feet above the MO.

The language RCRD is submitting adds two safeguards. Staff first confirm that a reading reflects static conditions, not a nearby pump running. An investigation then starts only when a confirmed reading below the LML persists through the year to the same season, such as fall, spring and the following fall. Using spring and fall readings is consistent with the SGMA regulations, which require static groundwater measurements "at least two times per year, to represent seasonal low and seasonal high groundwater conditions" (23 CCR § 354.34(c)(1)(B)).

LMLs are the next major step for this subbasin. SGMA does not require them. DWR's list of sustainable management criteria (the sustainability goal, undesirable results, MTs and MOs) does not include LMLs, and the draft Periodic Evaluation calls them "a non-regulatory, early-warning trigger." Farmers supported LMLs early in this Periodic Evaluation because they are the best way to find out at what water level impacts actually begin.

The record shows the subbasin in good shape at the lowest water levels of the past 25 years. In approving the plan, DWR described the MOs, which are projected 2030 levels, as "the lowest levels observed since 2000." Through the 2021-22 drought, the greenness of plants that may rely on groundwater dipped and then "rebounded in 2023 and 2024 to pre-drought levels" (ESA's March 2026 study). The two shallow wells that monitor Chico's urban forest are "stable for the period of record" (draft Periodic Evaluation, p. 5-7), which begins in 2006 at one well and 2005 at the other (draft amended GSP, Table 4-1). Over the evaluation period, the draft found about 40 reports of failing domestic wells and no other reports of conditions affecting beneficial uses and users. It concluded that conditions related to the chronic lowering of groundwater levels "are not negatively impacting other sustainability indicators."

The subbasin remains in a relatively healthy position at its historic lows, but the record says little about conditions below them. At the RMS wells in the North and South Management Areas, the MTs sit 53 to 84 feet below the MOs, and the record does not show where in that range significant and unreasonable effects related to all sustainability indicators would begin. If such effects would occur at the MTs, early signs would most likely appear on the way down, before the MTs were reached. LMLs set below the MOs would have the GSAs look for those signs step by step, starting from what the record shows, well before water levels reach the MTs. Each investigation adds evidence, and over time that evidence can show where significant and unreasonable effects begin. LMLs will help keep the subbasin safe and protect its groundwater as an asset for everyone who depends on it.

RCRD's proposed LML language. To further demonstrate its commitment to this process, RCRD is submitting more detailed LML language with this letter, as tracked changes to the draft Periodic Evaluation and the draft amended GSP. It responds to Vice Chair Kimmelshue's call for stronger LML language. The language, set out in full in the draft amended GSP, covers each step from a reading below an LML to a decision by the GSA Boards: staff confirm the reading within two weeks and report it to the GSA Management Committee, the SHAC and the Boards; an investigation starts when a confirmed reading below the LML persists through the year to the same season, such as fall, spring and the following fall; a Technical Committee of qualified credentialed professionals, set up by the GSA Management Committee defined in the Cooperation Agreement, investigates the cause and possible impacts for each sustainability indicator; within 180 days of the triggering readings, the Technical Committee reports its findings and recommendations to the SHAC and the Boards; and, if it finds impacts, the GSA Boards decide what to do through a public process.

Interim milestones already hold the GSAs to account. Every annual report must describe "progress towards implementing the Plan, including achieving interim milestones" (23 CCR § 356.2(c)). In approving the plan, DWR found that "the majority of the interim milestone groundwater levels are the same as the measurable objectives and when the interim milestones are different, they only differ by a few feet." Under the August 12 direction, LMLs sit 20 feet below the MOs, so a falling water level would drop below the interim milestone levels before it reached an LML, and the GSAs would have to say so in the annual report. The plan also ties action to the milestones. DWR's findings state that "The GSAs plan to implement the groundwater allocation to manage groundwater demand only in the event that the proposed projects fail to achieve interim milestones and the Subbasin is projected to not be able to achieve sustainability goals by 2042." In RCRD's view, a trend away from the interim milestones could result in a response before any LML is reached.

Farmers have been stewards of this groundwater. For decades, farmers have worked to protect Butte County's groundwater for domestic well owners, farmers and the environment. In the late 1970s, farmers worked with environmentalists and then-Supervisor Jane Dolan to develop the Chico Area Greenline, an urban limit line west of Chico that has protected farmland from sprawl. In the early 1990s, Samantha Lewis and other farmers funded the effort to create the Butte Basin Groundwater Model, when most counties had nothing like it. In response to the State's drought water bank, farmers campaigned for the countywide groundwater ordinance that voters passed in November 1996, and they supported a well ordinance with spacing, pumping-capacity and notification rules. After the Sustainable Groundwater Management Act (SGMA) passed, farmers formed the Agricultural Groundwater Users of Butte County to take part in the GSA process, and helped form the Tuscan Water District to carry out surface water, recharge and demand reduction projects.

During this Periodic Evaluation, farmers have supported these additional guardrails in the plan:

- an RMS network expanded from 17 to 29 wells, which the Vina Board approved 5-0 at the August 12 joint meeting;
- a new MT for land subsidence, "0.5 foot of cumulative subsidence over a five-year period," in place of using groundwater levels to stand in for subsidence;
- new estimates of how much groundwater the subbasin has gained or lost from storage since 2000, based on the 29 RMS wells;
- a Domestic Well Mitigation Program, which DWR's corrective actions did not call for: the GSAs intend to begin developing it in early 2027, and the Vina GSA's FY 2026-27 budget, adopted June 10, includes \$50,000 to start that work;

- new monitoring wells, including new shallow wells, drilled to fill gaps in the groundwater level and interconnected surface water data;
- and the LMLs themselves, which SGMA does not require.

The subbasin is in good condition. Farmers here care about the resource, and they have done their part over the years and during this Periodic Evaluation.

RCRD is pleased with the progress the Vina Board made on October 14 and appreciates the Board's consideration of all viewpoints. The introduction of LMLs is a major milestone for the Vina Subbasin. This concept embraces the adaptive management approach DWR expects of GSP implementation under SGMA, especially in a relatively healthy subbasin whose groundwater levels rebounded after the 2014-15 and 2021-22 droughts and that, according to the draft Periodic Evaluation, remains on track to achieve its sustainability goal by 2042. We look forward to working with the Vina GSA through the SHAC and at the joint meetings in November and December.

Sincerely,



Darren Rice

Chair, Board of Trustees, Rock Creek Reclamation District

Attachments: RCRD proposed LML language: tracked changes to the draft 2027 Periodic Evaluation and to the draft amended GSP.

Proposed LML Language, Version 2: Draft Periodic Evaluation

Excerpt from the September 15, 2026 public review draft, with proposed changes tracked (version 2, October 23, 2026). Prepared for the Rock Creek Reclamation District Board.

Underlined blue text is proposed new language. ~~Struck red text~~ is proposed for deletion. All other text is the public review draft as written. Figures are not reproduced.

Draft Periodic Evaluation, Sections 3.1.2 and 3.1.3 (pp. 3-4 to 3-7)

DWR's Recommended Corrective Actions

DWR's 2023 GSP determination letter RCA 3 requested the GSAs provide sufficient information regarding criteria used to identify significant and unreasonable conditions, undesirable results, and the potential impacts to various beneficial uses and users of groundwater related to the chronic lowering of groundwater level minimum thresholds. DWR made the following requests (verbatim):

Corrective Action 3a: Revise the definition of undesirable results and language pertaining to significant and unreasonable lowering of groundwater level to remove the non-dry year condition or discuss how extractions and recharge will be managed as necessary to ensure that reductions in groundwater levels or storage during dry years are offset by increases in groundwater levels or storage during other years within the sustainable management criteria for the chronic lowering of groundwater levels.

- GSA Response: The GSAs will manage groundwater extractions and recharge to ensure reductions in groundwater levels or storage during dry years are offset by increases in groundwater levels or storage during other years. The basin has recently experienced two unprecedented droughts (2014/15 and 2021/22). Groundwater levels have rebounded from these droughts due to recent above normal and wet years. The GSAs expect wet and dry cycles to continue. The GSAs continue to develop recharge projects and demand management actions to implement if groundwater levels begin to drop below measurable objectives. The GSAs will manage groundwater levels at the interim milestones / measurable objectives. Local Management Levels (LMLs) – set 20 feet below the MO – were defined at fourteen (14) RMS wells to prompt an investigation into local conditions and evaluation of potential impacts related to other sustainability indicators~~Board consideration of adaptive management actions~~ if groundwater levels persistently ~~reach~~fall below the LML. LMLs were assigned to a selection of RMS wells to provide early information for three considerations: areas of shallow groundwater and identified groundwater dependent ecosystems (based on the 2026 ESA analysis), areas near the Subbasin boundary where conditions are coordinated with adjacent subbasins, and one area with a high density of domestic wells. LMLs are further described in Section 3.1.3: Amendments to GWL SMC.

Corrective Action 3b: Provide information on impacts to domestic wells during projected conditions where minimum thresholds are exceeded but undesirable results do not occur and also quantify domestic wells that will be impacted by the proposed minimum threshold. Furthermore, the GSAs should evaluate the impacts of proposed minimum thresholds on other beneficial uses and users, such as public and small water systems and environmental uses and users.

- GSA Response: The Subbasin has a total of 2,069 wells installed since 1980 across four well type categories: domestic, industrial, irrigation, and public supply. Based on projected conditions where groundwater levels fall to Minimum Thresholds at all RMS wells subbasin-wide, approximately 282 wells (14%) are identified as at-risk (Table 3-3). There are approximately 1,472 domestic wells within the Subbasin and approximately 266 are at-risk if groundwater levels were to fall to minimum thresholds at all RMS wells subbasin wide. Domestic wells are typically shallower and are more prone to impacts from groundwater level declines. A small number of industrial wells (2 wells, 8%) are at-risk, indicating limited exposure for industrial users. Only 14 irrigation wells (3%) are at-risk, as most irrigation wells are constructed to greater depths or in areas less impacted by projected MT exceedances. No public supply wells are projected to be at-risk (0%), indicating that public water systems are constructed with sufficient depth. MT is a regulatory line defining where Undesirable Results occur — not the level the GSAs manage toward. Measurable Objectives sit about 62 feet higher on average, and a separate mitigation program will address individual impacts (see Section 4.6.2). The GSAs intend to develop a Well Mitigation Program during the next implementation period (2027–2032), tailored to the specific conditions and needs of the Subbasin. Real-world impacts to wells of all types (domestic, industrial, irrigation, and public supply) are expected to be substantially lower than the numbers shown in Table 3-3. Public and small water systems, along with environmental users, will continue to be evaluated in coordination with beneficial use assessments to ensure MT-setting remains protective across all user categories

Table 33. Number of At-Risk Wells by Well Type.

Well Type	Number of Wells Installed since 1980	Wells At-Risk at MT Level (Post-1980)	Percent of Total
Domestic	1,472	266	18%
Industrial	25	2	8%
Irrigation	527	14	3%
Public Supply	45	0	0%
Total:	2,069	282	14%

Corrective Action 3c: Provide a description of the relationship between established minimum thresholds for the chronic lowering of groundwater levels and how they avoid undesirable results for each of the other sustainability indicators.

- GSA Response: To improve monitoring for impacts on beneficial uses and users and other sustainability indicators, the groundwater level RMS network has been revised, the full network expanded, and new wells drilled to fill data gaps in groundwater level and ISW. The 2027 through 2032 implementation period will continue to collect data for improved observation of groundwater conditions relative to GDEs and ISWs. Progress has been made to fill data gaps through the installation of new shallow wells, but without the data from these new monitoring locations, the data gap remains. The 2032 PE will assess current groundwater level SMCs relative to GDEs and ISWs using new information available at that time and additional guidance from DWR. The Local Management Levels described above are intended to provide early information about groundwater level declines before an undesirable result occurs, and so also support avoiding undesirable results for the other sustainability indicators. LMLs are further described in Section 3.1.3.

The following section describes all proposed amendments to the GSP to address DWR's recommended corrective actions.

Amendments to GWL SMC

The interim milestones, measurable objectives, and minimum thresholds for groundwater levels were not changed during this evaluation period. The amended GSP adds non-regulatory Local Management Levels, described below. The monitoring network was changed with the number of groundwater level RMS wells increased from seventeen (17) to twenty-nine (29) wells ~~and with~~ two (2) additional wells for GDEs within the Chico MA for a total well count of thirty-one (31). New groundwater level RMS wells were given an IM, MO, and MT comparable to those specified in the 2022 GSP, using a method developed to maintain consistency with the adopted 2022 GSP SMC framework.

Local Management Levels (LMLs) were developed to provide an early warning mechanism to support proactive water management in the Vina Subbasin, ~~and~~ ensure management of groundwater levels within a reasonable range of the IMs and MOs, ~~and provide a trigger to initiate assessment to confirm no impacts to other sustainability indicators~~. LMLs have been designated ~~at on~~ fourteen (14) RMS wells ~~and set~~ at 20 feet below the Measurable Objectives. LMLs are assigned to a subset of the RMS wells based on three criteria: 1. In potential GDE and shallow RMS well areas (09E001, 27L001, 36P001, 20K001, and 32E001) 2. In RMS areas near subbasin boundaries (25C001, 05M001, 10B003, 27D001, 02H003, 09G001, 24C001, and 33L001), and 3. In an RMS polygon with a relatively large number of domestic wells (29P002).

Groundwater level MTs are currently set to avoid undesirable results related to domestic well impacts. However, there is uncertainty as to whether undesirable results associated with other sustainability indicators would be experienced at groundwater level MTs. LMLs reflect conservative minimum groundwater levels, which ~~may do not necessarily~~ constitute significant or unreasonable conditions for groundwater levels and trigger a response to confirm significant or unreasonable conditions have not occurred for other sustainability indicators. Set at shallower levels than ~~minimum threshold~~ MTs, LMLs serve as an early warning mechanism that triggers investigation into local conditions and evaluation of potential impacts related to other sustainability indicators ~~adaptive management and enables early intervention before minimum thresholds are reached~~. If the observed groundwater level measurements in an RMS reach falls below the LML, the measurement agency will confirm the measurement reflects static conditions. If the observed groundwater level measurement in an RMS falls below the LML, and persists through multiple observed groundwater measurements across differing the year to the same seasons (i.e. one year, three consecutive seasonal measurements of spring, summer, or fall to spring to fall), then the following actions-general steps would occur:

- Staff will report the hydrograph of the well with measurements at or below the LML to the SHAC and Boards at their next meeting
- The GSA Management Committee, as defined in the Cooperation Agreement, will establish a Technical Committee made up of qualified ~~The technical-credentialed team~~ professional(s) will investigate whether the condition is due to localized, isolated conditions (ex. well interference) or reflective of broader changes in aquifer conditions and evaluate the likely root cause(s). The investigation will consider nearby groundwater users, land use, geology, surface water operating

conditions, water year type, gradients, groundwater level trends, nearby pumping amounts, among others.

- No undesirable results for Chronic Lowering of Groundwater Levels will occur if groundwater levels continue to fall below the LMLs and maintain above the MTs, however the Technical Committee will evaluate whether undesirable results related to the other Sustainability Indicators are occurring. Therefore, the investigation will include an evaluation of potential impacts occurring to domestic wells, shallow agricultural wells, environmental uses of groundwater, degradation of water quality produced by the well, or infrastructure and surface land uses due to land subsidence in the vicinity of the RMS well and within the RMS polygon. The evaluation will be coordinated with analyses completed for the Annual Report.
- ~~Staff/technical consultants~~ The Technical Committee, under the direction of the GSA Management Committee, ~~would~~ will develop a technical report explaining the investigation and identification of likely underlying cause(s). If no impacts have been found or the condition is attributed to localized, isolated conditions and is not a subbasin-wide issue, then the report will document current groundwater level conditions have not caused signification or unreasonable conditions and no further action is required. If impacts have been found, the report will also present recommendations for initiation of adaptive management actions ~~to the GSA Boards to receive direction on appropriate next steps.~~
- ~~Depending on the cause, the Board could consider or direct the following actions, which may include:~~
- Expansion of existing monitoring (ex. increased frequency) or expansion of measurement locations.
- ~~Evaluation of impacts occurring to domestic wells, shallow agricultural wells, or environmental uses of groundwater in the vicinity of the RMS well~~
- Further technical evaluation of factors causing the LML and potential solutions to remedy the LML exceedance.
- Activation of a GSP Project or Management Action (see Chapter 5), and/or
- Management modifications in areas experiencing groundwater declines that continue to fall below LMLs.
- Annual Reporting will document the condition, report findings, and GSA response if needed.

If groundwater levels continue to decline further below the LML, a follow-up evaluation into potential impacts to other sustainability indicators may be needed. ~~Potential actions will be considered through a public process, including evaluation and recommendations from the SHAC, and ultimately decided by the GSA Boards. Actions may include additional studies or assessments and management modifications including demand management in areas experiencing groundwater declines that reach or fall below LMLs.~~ Corrective actions or information-gathering efforts will be considered successful when monitoring data confirms groundwater conditions have stabilized or returned above the LML, ~~or the condition is attributed to localized, isolated conditions that have not resulted in significant and unreasonable impacts to beneficial users or uses of groundwater and is not a subbasin-wide issue~~ and no impacts have occurred to other sustainability indicators.

Proposed LML Language, Version 2: Draft Amended GSP

Excerpt from the September 15, 2026 public review draft, with proposed changes tracked (version 2, October 23, 2026). Prepared for the Rock Creek Reclamation District Board.

Underlined blue text is proposed new language. ~~Struck red text~~ is proposed for deletion. All other text is the public review draft as written, including staff's own changes in the draft amended GSP. Figures are not reproduced.

Draft Amended GSP, Section 3.3.4, Local Management Levels

Groundwater level MTs are currently set to avoid undesirable results related to domestic well impacts, and for GDEs within the Chico Management Area. However, there is uncertainty as to whether undesirable results associated with other sustainability indicators would be experienced at groundwater level MTs. Local Management Levels (LMLs) were developed to provide an early warning mechanism to support proactive water management in the Vina Subbasin and ensure management of groundwater levels within a reasonable range of the IMs and MOs. LMLs have been designated on fourteen (14) RMS wells at 20 feet below the Measurable Objectives. LMLs are assigned to a subset of the RMS wells based on three criteria: 1. In potential GDE and shallow RMS well areas (09E001, 27L001, 36P001, 20K001, and 32E001) 2. In RMS areas near subbasin boundaries (25C001, 05M001, 10B003, 27D001, 02H003, 09G001, 24C001, and 33L001), and 3. In an RMS polygon with a relatively large number of domestic wells (29P002).

LMLs reflect conservative minimum groundwater levels, which ~~do not~~may not necessarily constitute significant or unreasonable conditions for groundwater levels, but instead trigger a response to confirm significant or unreasonable conditions have not occurred for other sustainability indicators. Set at shallower levels than ~~minimum threshold~~MTs, LMLs serve as an early warning mechanism that triggers investigation into local conditions and evaluation of potential impacts related to other sustainability indicators~~adaptive management and enables early intervention before minimum thresholds are reached.~~

If the observed groundwater level measurement in an RMS well~~s reach~~falls below the LML, then the following steps will occur.

Step 1: Identify and Report LML Trigger Event

Within two weeks, Staff at the measuring agency will confirm the measurement reflects static conditions through the following actions:

- Review field notes and flags (e.g., nearby well was pumping, oil in casing, etc.) to confirm the measurement is representative of static conditions; and
- Elect to re-measure depth to groundwater at the RMS well if uncertainty remains.

If the measurement is found to be anomalous or not representative of static conditions, the measurement will be flagged and not considered. If the measurement is confirmed, Staff will report the hydrograph of the well with measurements below the LML to the GSA Management Committee, SHAC and Boards.

If the confirmed groundwater level measurement in an RMS well falls below the LML and persists through ~~multiple observed groundwater measurements across differing~~the year to the same seasons

(i.e., one year, three consecutive seasonal measurements of spring, summer, or fall to spring to fall), then the following ~~actions~~steps would occur:

- ~~Staff will report the hydrograph of the well with measurements at or below the LML to the SHAC and Boards at their next meeting~~

Step 2: Investigate the RMS Area and Evaluate Outside Contributing Factors

The ~~technical team will~~GSA Management Committee, as defined in the Cooperation Agreement, will establish a Technical Committee made up of qualified credentialed professional(s) to investigate whether the condition is due to localized, isolated conditions (ex. well interference) or reflective of broader changes in aquifer conditions. Additionally, the investigation will evaluate the likely root cause(s), and whether the condition is caused by outside contributing factors or groundwater management activities such as groundwater extractions. The Technical Committee will consider information and analyses completed as part of the Annual Report and the following as part of their investigation, including:

- RMS well location, construction, lithology, and condition;
- Local geology;
- Current land use and recent changes in land use near the RMS well, including any changes in local demand;
- Location of production wells located within and near the RMS polygon, including new wells or groundwater users;
- Nearby groundwater extractions, including any changes within the last one to three years;
- Regional groundwater level changes, including those in nearby RMS wells and neighboring GSA(s);
- Sacramento Valley Water Year type and recent precipitation compared to prior five years;
- Water District and GSA operating conditions, such as surface water availability and changes in delivery systems;
- Groundwater level trends since at least 2015 in the RMS well using observed data and statistical test, such as Mann-Kendall
- Seasonal variation and range of groundwater level measurements in the RMS well; and
- Observed groundwater level compared to historical low.

Step 3: Evaluate Potential Impacts

No undesirable results for Chronic Lowering of Groundwater Levels will occur if groundwater levels continue to fall below the LMLs and maintain above the MTs, however the GSAs will evaluate whether undesirable results related to the other Sustainability Indicators are occurring. The investigation will include an evaluation of potential impacts occurring to domestic wells, shallow agricultural wells, environmental uses of groundwater, degradation of water quality produced by the well, and/or infrastructure and surface land uses due to land subsidence in the vicinity of the RMS well and within the RMS polygon. Since there is uncertainty as to whether undesirable results associated with other sustainability indicators would be experienced at groundwater level MTs, potential impacts will be assessed for each sustainability indicator, as follows:

- Chronic Lowering of Groundwater Levels and Reduction of Groundwater Storage: Evaluate domestic well and shallow agricultural well impacts. Report the count of domestic wells in the RMS polygon reported dry (to either DWR or to the GSA), and identify those shallow wells (both domestic and agricultural) at risk of going dry at current groundwater levels. This would be coordinated with the analyses completed for the Annual Report.
- Depletion of ISW: Evaluate shallow groundwater level conditions near identified ISW, including RMS wells from the ISW network. Assess whether there has been a change in stream interconnectivity or stream depletion as a result of lowered groundwater levels. This would be coordinated with the analyses completed for the Annual Report.
- Degraded water quality: Plot specific conductivity in samples from the RMS wells within the RMS polygon, and evaluate whether there is a statistically significant correlation between groundwater elevation and conductivity determined through calculation of a cross-correlation coefficient (p-value = 0.05).
- Land subsidence: In coordination with the analysis completed for the Annual Report, plot InSAR land subsidence data to assess whether land surface elevation changes have occurred within the RMS polygon. If data availability allows, estimate the critical head following at least one of the approaches detailed in DWR's Land Subsidence Best Management Practices (DWR, 2026) and compare to the RMS well groundwater elevation. Identify if any land surface features or nearby infrastructure (ex. roads, canals) have been impacted as a result of land subsidence.

Step 4: Report Findings and Recommendations

Within 180 days of three consecutive seasonal measurements triggering event, the Technical Committee, under the direction of the GSA Management Committee, will document the results of the investigation in a report and provide recommendations to the SHAC and GSA Boards. The report will include a summary of groundwater level conditions at the RMS well (results from Step 1), investigation findings, including the identified likely cause(s) of the groundwater level decline (results from Step 2), and summary of potential impacts found, if any, for each sustainability indicator (results from Step 3). If no impacts have been found (results from Step 3) or the condition is attributed to localized, isolated conditions and is not a subbasin-wide issue (results from Step 2), then the report will document current groundwater level conditions have not caused significant or unreasonable conditions and no further action is required. If impacts have been found (results from Step 3), the report will also present recommendations for initiation of adaptive management actions, which may include:

- ~~Staff/technical consultants would develop a technical report explaining the underlying cause to the GSA Boards to receive direction on appropriate next steps.~~
- ~~Depending on the cause, the Board could consider or direct the following actions:~~
- Expansion of existing monitoring (ex. increased frequency) or expansion of measurement locations.
- Further technical evaluation of factors causing the LML and potential solutions to remedy the LML exceedance.
- Activation of a GSP Project or Management Action (see Chapter 5), and/or
- Management modifications in areas experiencing groundwater declines that continue to fall below LMLs.

The recommendations will also include timing for initiation.

- ~~Annual Reporting will document the condition and GSA response~~

Step 5: GSA Board Consider Actions

If the Report produced under Step 4 concludes that impacts have been found, the GSA Boards will consider recommendations to initiate adaptive management actions. Potential actions will be considered through a public process, including evaluation and recommendations from the ~~SHAC~~ Technical Committee and GSA Management Committee, input from the SHAC, and ultimately decided by the GSA Boards. The Technical Committee under the direction of the GSA Management Committee will finalize the report and recommendations based on input from the SHAC, and the GSA Boards will consider the report at their next regular Board meeting. During this regular Board meeting, the GSA Boards will decide how to proceed with the recommendations. ~~Actions may include additional studies or assessments and management modifications including demand management in areas experiencing groundwater declines that reach or fall below LMLs.~~

Step 6: LML Trigger Event Close Out

The LML trigger, report findings, and GSA response if needed will be documented during Annual Reporting. LMLs may warrant adjustment downward if no impacts to other sustainability indicators have been observed, and this will be assessed during the next Periodic Evaluation.

If groundwater levels continue to decline further below the LML, a follow-up evaluation into potential impacts to other sustainability indicators may be needed. Corrective actions or information-gathering efforts will be considered successful when monitoring data confirms groundwater conditions have stabilized or returned above the LML and no impacts have occurred to other sustainability indicators, ~~or the condition is attributed to localized, isolated conditions that have not resulted in significant and unreasonable impacts to beneficial users or uses of groundwater and is not a subbasin-wide issue.~~

Also changed: Executive Summary, paragraph on LMLs

Local Management Levels (LMLs), established 20 feet below the Measurable Objectives, have been designated for a subset of groundwater level RMS wells to guide the GSAs in evaluating and implementing adaptive management actions in order to manage groundwater conditions toward the MO. Groundwater level MTs are currently set to avoid undesirable results related to domestic well impacts. However, there is uncertainty as to whether undesirable results associated with other sustainability indicators would be experienced at groundwater level MTs. LMLs provide an implementation tool for local management that will trigger investigation into local conditions and an evaluation of potential impacts related to other sustainability indicators ~~provide interim measures before groundwater levels approach significant or unreasonable conditions.~~ Set at shallower levels than minimum thresholds, LMLs serve as an early warning mechanism that triggers investigation into local conditions and evaluation of potential impacts related to other sustainability indicator to support proactive water management in the Vina Subbasin. ~~Adaptive management is triggered when groundwater levels reach LMLs, enabling early intervention before minimum thresholds are exceeded.~~ If observed groundwater level measurements reach fall below the LML and persists through multiple observed groundwater measurements across differing the year to the same seasons (i.e. ~~spring, summer~~ one year, three consecutive seasonal

measurements of fall or to spring to fall), the GSA Management Committee will establish a Technical Committee made up of qualified credentialed professional(s) that will investigate the conditions around the RMS, determine the likely underlying cause(s) of the lowered groundwater levels, evaluate potential impacts related to other Sustainability Indicators, and if needed, identify and recommend appropriate actions for the SHAC and GSA(s) to address and consider in response to the condition. Additional information on LMLs is provided in Section 3.3.4 of this amended GSP.

Also changed: Executive Summary, table of DWR's Recommended Corrective Actions (rows for RCA 3b and 3c)

Determination Letter Page No.	GSP Section No.	GSP Section	Recommended Corrective Action (RCA)	Description
44	3.3.2 & 4.2	Sustainable Management Criteria - Groundwater Levels - Minimum Thresholds AND Monitoring Networks – Groundwater Level Monitoring	RCA 3b: Provide information on impacts to domestic wells during projected conditions where minimum thresholds are exceeded but undesirable results do not occur and also quantify domestic wells that will be impacted by the proposed minimum threshold. Furthermore, the GSAs should evaluate the impacts of proposed minimum thresholds on other beneficial uses and users, such as public and small water systems and environmental users and users.	Quantified the number of domestic wells at-risk at the minimum thresholds. The GSA intends to develop a Domestic Well Mitigation Program during the next implementation period (2027–2032), tailored to the specific conditions and needs of the subbasin. Evaluated the impacts of proposed minimum thresholds on other beneficial uses and users, including public and small water systems and environmental users and users. Documented in Periodic Evaluation. Groundwater level monitoring network was amended to include additional RMS wells and to establish Local Management Levels to strengthen representativeness of the monitoring network for beneficial uses and users of groundwater.
44	3.3.2 & 4.2	Sustainable Management Criteria - Groundwater Levels - Minimum Thresholds AND Monitoring Networks – Groundwater Level Monitoring	RCA 3c: Evaluate how the proposed minimum thresholds for the chronic lowering of groundwater levels may impact other sustainability indicators (e.g., groundwater storage, depletion of interconnected surface water, etc.).	Evaluated how the proposed minimum thresholds for the chronic lowering of groundwater levels may impact other sustainability indicators (e.g., groundwater storage, depletion of interconnected surface water, etc.). The GSA incorporated additional RMS wells to improve groundwater storage estimate. The GSA established a shallow groundwater monitoring network to improve understanding of depletion of interconnected surface water. Documented in Periodic Evaluation. Groundwater level monitoring network was amended to include additional RMS wells and to establish Local Management Levels (LMLs). <u>LMLs serve as early warning indicators which would trigger investigation into local conditions and adaptive management actions with the goal of returning groundwater levels above the LML.</u>

Also changed: Section 5.3.7, Groundwater Allocation (one word)

SGMA requires that GSPs describe the projects and management actions to be implemented as part of bringing the Vina Subbasin into sustainability. As a last resort, in the event that the proposed projects fail to achieve IMs and the Vina Subbasin is projected to not be able to achieve sustainability goals by 2042,

the GSAs may need to consider implementation of groundwater allocations to manage groundwater demand. If [confirmed](#) groundwater levels persistently reach Local Management Levels in two contiguous RMS wells and technical information indicates an allocation will remedy the LML, staff may bring forward groundwater allocation for consideration by the Boards. The implementation of this management action would be based on an evaluation by the Joint Management Committee. The consideration of groundwater allocation would be based on the groundwater budgets and updated monitoring data throughout the Vina Subbasin, as presented in annual reports.

Subject: Public comment: Vina Subbasin Groundwater Sustainability Plan amendments
Date: Sunday, October 25, 2026 2:31:23 PM

October 25, 2026
Patricia Dobson

I am a: Municipal user, Residential well user, Recreational user

Dear Vina GSA Board of Directors,

I am a local resident and domestic well owner user within the Vina Subbasin. I also reside across the street from a groundwater dependent ecosystem, Bidwell Park, that you have underrepresented in NCCAG and include the Local Refinement of GDE Mapping with Place-Based Monitoring Plan in the Amended GSP as a committed project for the next implementation period. The Board's October 14th decision to retain the current minimum thresholds (MTs) and the "non-dry year" provision ignored the growing substantial public input and your continually ignored requests has undermined the democratic process. This plan fails to adequately protect groundwater users. I am submitting this public comment to request the following amendments and improvements to the Groundwater Sustainability Plan (GSP):

1. Adopt Alternative 3 proposed by Dr. Greene and strengthen Minimum Thresholds (MTs) to provide for a 40-ft buffer below Measurable Objectives (MOs).

The Board's decision to retain the current MTs sets dangerously low regulatory thresholds that do not adequately protect domestic wells, small farms, disadvantaged communities, or groundwater-dependent ecosystems. The two year minimum threshold exceedance requirement should be removed. I urge the Board to adopt Alternative 3 and raise MTs to provide a 40-foot buffer below MOs.

Identification and mapping of non-riparian oak woodlands remains an unresolved data gap. We recommend using local datasets, including the City of Chico tree inventory, and ground-truthing methods to refine priority GDE mapping. We also request that the final Periodic Evaluation recognize Bidwell Park as likely underrepresented in NCCAG and include the Local Refinement of GDE Mapping with Place-Based Monitoring Plan in the Amended GSP as a committed project for the next implementation period.

2. Remove the "non-dry year" provision.

The definition of Undesirable Results for chronic lowering of groundwater levels should not exclude dry years. Consecutive MT exceedances should be evaluated regardless of whether conditions are wet, normal, or drought. Wells that go dry during drought conditions must count toward Undesirable Results.

3. Establish and fund a Well Mitigation Program without excluding pre-1980 wells.

Provide assistance to families and small farms whose active wells go dry, regardless of well construction date. You have underestimated the actual number of domestic wells in the Vina Subbasin and therefore underestimated the actual number of wells that potentially will go dry because of your historically low level MT's.

4. Local Management Levels (LMLs) 15 feet below each Measurable Objective should be an enforceable early-warning mechanism that requires evaluation and corrective action when an LML is triggered.

An LML trigger should automatically require staff to assess impacts to domestic wells and groundwater-dependent ecosystems, and recommend defined adaptive management actions to the Board within a specified timeframe. The GSA should not have discretion to simply continue monitoring after an LML is triggered. LMLs must function as an enforceable early-warning mechanism that compels evaluation and corrective action well before a Minimum Threshold is reached.

The two proposed Chico GDE RMS wells do not currently have LMLs, but the Periodic Evaluation states that

formal evaluation of the Chico Urban Forest would be triggered if a Chico-area or GDE well reaches its LML. We request clarification regarding which monitoring well, LML, or other condition would trigger evaluation of the Chico Urban Forest.

assigned MTs. Where an RMS well is not sufficiently deep to reliably monitor groundwater conditions through its assigned MT, the GSA should explain how the well can function as an effective compliance point or consider modifying the monitoring location or SMC as appropriate.

Where LMLs are intended to provide early warning for GDEs, we recommend that monitoring well measurements are taken more frequently and that the GSA clarify a strategy that could include: developing a reporting system, direct outreach to well owners via mailers, and prioritizing demand reduction over recharge as a first principle if LMLs are reached. Where possible, we would encourage the use of ecological threshold recommendations and/or ecological indicators rather than a standard of 20-feet below the MO.

5. Projects are currently identified as “Other Projects” that the GSA does not rely upon to achieve sustainability. Several of the proposed monitoring activities are important to understanding the relationship between shallow groundwater conditions and GDE health. Where monitoring indicates declining conditions in priority GDEs, the GSA should identify appropriate responses.

For these reasons, we strongly encourage the Board to include the Chico Urban Forest Vulnerability Assessment, Community Science program, and Local Refinement of GDE Mapping with Place-Based Monitoring Plan as committed projects in the Amended GSP. These projects are intended to help the GSA identify alternative funding sources and implement plans to meet these objectives. Implementation of these efforts would help the GSA determine when groundwater conditions are, and are not, measurably affecting GDEs and support informed adaptive management.

We also support inclusion of the California Open Lands multi-benefit recharge proposal, which could advance groundwater sustainability through targeted demand management and groundwater recharge.

SGMA requires GSAs to consider and protect the interests of all groundwater uses and users and to engage affected communities in sustainable groundwater management (Water Code §10723.2). As currently written, the Vina GSP does not protect my interests as a beneficial user.

Stakeholders have voiced support for a more transparent interbasin coordination process for activities that may affect groundwater conditions across subbasin boundaries.

We respectfully request public participation in discussions and analyses of groundwater substitution programs, water sales, voluntary agreements, and drought resilience plans. Significant projects call for a more robust interbasin coordination process that helps stakeholders track and engage in projects and processes with regard to EIR on projects that affect groundwater across subbasin boundaries.

Please include this comment in the public record and advise how these requested amendments and improvements will be addressed, including when the GSA Board intends to review and update the GSP.

Thank you for your consideration.

Respectfully,
Patricia Dobson

Sent from my iPhone