



Vina Groundwater Sustainability Agency
308 Nelson Avenue, Oroville, CA 95965
(530) 552-3592
VinaGSA@gmail.com

Vina Groundwater Sustainability Agency (GSA) Stakeholder Advisory Committee (SHAC) Meeting

Date: Wednesday, October 28, 2026

Time: 9:00 AM - 12:00 PM

Location: Chico City Council Chamber, Conference Room #1, 421 Main Street, Chico, CA.

Or [Join the Vina GSA SHAC Meeting via Zoom](#)

Meeting ID: 814 0243 0033

Join via phone: +1 669 900 6833

Live streaming and recording of Vina GSA SHAC meetings are provided for viewing purposes only. Please note that in-person attendance is required for public participation. Streaming and recording services are subject to discontinuance if technical or other issues prevent effective meeting proceedings.

MEETING AGENDA

October 28, 2026

1. **Call to Order and Roll Call**
2. **Business from the Floor**

The public and Stakeholder Advisory Committee (SHAC) members will have an opportunity to comment on items not on the agenda and that are relevant to SHAC. Committee members and Management Committee staff are not required to respond to any issues raised during the public comment period. Commenters are asked to respect differing perspectives and to keep remarks within three minutes.

3. ***Review and Approval of 09/23/2026 SHAC Meeting Minutes**

Requested Action: Approve the 09/23/2026 meeting minutes.

4. ***Discussion and Recommendation regarding Local Management Levels and related topics including non-dry year and minimum thresholds and how they are described in the Periodic Evaluation and amended Groundwater Sustainability Plan**

On October 14, 2026, the Vina GSA Board referred items associated with “Alternative 3” to the SHAC for a recommendation to be considered at the upcoming Joint GSA Board meeting on November 4, 2026. These items include Local Management Levels (LMLs) and the “non-dry year” language. LMLs are a new early-warning mechanism in the public review drafts of the Periodic Evaluation and amended Groundwater Sustainability Plan. As drafted, they are set 20 feet below the Measurable Objective at 14 of the 31 groundwater level Representative Monitoring Site wells. The Board expressed a preference for setting LMLs 15 feet below the Measurable Objective. It also asked for prescriptive language on what actions would occur if an LML is reached. Staff will review Board direction, public comments received, and the key issues for SHAC discussion: which wells receive LMLs, how the Chico Management Area is addressed, when an LML is triggered, required response actions, and possible links to Projects and Management Actions. **(Report - Christina Buck, Asst. Director Butte County Water and Resource Conservation)**

Requested Action: Discuss and provide a recommendation to the Vina GSA Board regarding the draft Periodic Evaluation and amended Groundwater Sustainability Plan, specifically related to Local Management Levels and how they are set and what action must be taken if LMLs were reached.

5. **GSA Program Manager and Management Committee Update** *(Verbal Report – Becky Anderson - Fairbanks, Interim Program Manager and Management Committee Staff)*

6. **SHAC Future Agenda Requests**

SHAC members may verbally request an item to be agendized at a future meeting. After stating what the item would be, a majority vote of the SHAC is needed in order for the Management Committee to agendize the item. SHAC members may also submit requests in writing to the GSA Program Manager to bring forward to the SHAC for consideration on a future agenda.

7. **Adjournment:**

The Committee will adjourn to their next meeting, **Wednesday, November 18, 2026.**

*Materials included in agenda packet



Vina Groundwater Sustainability Agency
308 Nelson Avenue, Oroville, CA 95965
(530) 552-3592
VinaGSA@gmail.com

Vina Groundwater Sustainability Agency (GSA) Stakeholder Advisory Committee (SHAC) Minutes

Date: Wednesday, September 23, 2026

Time: 9:00 AM - 12:00 PM

Location: Chico City Council Chamber, Conference Room #1, 421 Main Street, Chico, CA.

MEETING MINUTES* September 23, 2026

1. Call to Order and Roll Call – Meeting called to order at 9:00 AM

Committee Members Present: Susan Schrader, Samantha Lewis (Chair), Todd Greene, Anne Dawson, Patrick Riley, and Evan Markey

Committee Members Absent: Holly Swan, Joanne Parsley, and Greg Sohnrey

RCRD Representative Present: Bruce McGowan

Staff Present: Dillon McGregor, GSA Program Manager; Becky Anderson - Fairbanks, GSA Project Manager; Kamie Loeser, Director, Butte County Water & Resources Conservation; Brandon Mortimer, City of Chico

2. Business from the Floor

The public and Stakeholder Advisory Committee (SHAC) members had the opportunity to comment on items not on the agenda and that are relevant to SHAC.

Public Comment(s):

- Patrick Riley (SHAC Member)
- Timmarie Hammil

3. Review and Approval of 07/22/2026 SHAC Meeting Minutes

Public Comment(s): None

ACTION: Susan Schrader made a motion to approve the 7/22/2026 SHAC meeting minutes. That motion was seconded by Anne Dawson.

The motion passed unanimously.

4. Update on the Draft Periodic Evaluation and Plan Amendments

Staff provided an update on the status and anticipated timeline for the Groundwater Sustainability Plan (GSP) Periodic Evaluation and Plan Amendments, including information regarding the comment period for the draft documents and key decision-making milestones through January 2027. **(Report - Becky Anderson - Fairbanks, GSA Project Manager)**

Public Comment(s):

- Jim Brobeck
- Tod Kimmelshue
- Greg Brislain
- Todd Greene (SHAC Member)

Action: Accepted as information.

5. **Drought Resilience Plan Update**

Butte County Department of Water and Resource Conservation released the Draft Drought Resilience Plan (DRP) for a 45-day public review period that extended from July 15 through August 28, 2026. The DRP was prepared to comply with SB 552, which requires counties to improve drought and water shortage preparedness for state small water systems and domestic wells, and updates the 2004 Butte County Drought Preparedness and Mitigation Plan. Department staff presented an overview of the DRP for informational purposes. **(Report – Kamie Loeser, Butte County Department of Water and Resource Conservation)**

Public Comment(s):

- Jim Brobeck
- Greg Brislain

Action: Accepted as information.

6. **GSA Program Manager and Management Committee Update** *(Verbal Report - Dillon McGregor, GSA Program Manager and Management Committee Staff)*

Public Comment(s): None

7. **SHAC Future Agenda Requests**

SHAC members may verbally request an item to be agendized at a future meeting.

No requests received.

8. **Adjournment:**

Evan Markey made a motion to adjourn the meeting to their next meeting, Wednesday, October 28, 2026. That motion was seconded by Anne Dawson.

The motion passed unanimously. Meeting adjourned at 10:25 am.

**A video recording of this meeting is available on the Vina GSA website at [Stakeholder Advisory Committee - Vina Groundwater Sustainability Agency](#). The written minutes constitute the official record of the meeting. The video recording will be retained for reference purposes but may be removed in the event of technical issues affecting the recording, or until such time as the Agency adopts a formal records retention policy addressing video recordings.*



Vina Groundwater Sustainability Agency

Agenda Transmittal

Subject: Discussion and Recommendation regarding Local Management Levels and related topics including non-dry year and minimum thresholds and how they are described in the Periodic Evaluation and amended Groundwater Sustainability Plan

Contact: Christina Buck

Phone: (530) 552-3593

Meeting Date: October 28, 2026

Agenda Item: 4

Summary:

On October 14, 2026, the Vina GSA Board referred items associated with “Alternative 3” to the SHAC for a recommendation to be considered at the upcoming Joint GSA Board meeting on November 4, 2026. These items include Local Management Levels (LMLs) and the “non-dry year” language. LMLs are a new early-warning mechanism in the public review drafts of the Periodic Evaluation and amended Groundwater Sustainability Plan. As drafted, they are set 20 feet below the Measurable Objective at 14 of the 31 groundwater level Representative Monitoring Site wells. The Board expressed a preference for setting LMLs 15 feet below the Measurable Objective. It also asked for prescriptive language on what actions would occur if an LML is reached. Staff will review Board direction, public comments received, and the key issues for SHAC discussion and recommendation: which wells receive LMLs, how the Chico Management Area is addressed, when an LML is triggered, required response actions, and possible links to Projects and Management Actions.

Requested Action: Discuss and provide a recommendation to the Vina GSA Board regarding the draft Periodic Evaluation and amended Groundwater Sustainability Plan, specifically related to Local Management Levels and how they are set and what action must be taken if LMLs were reached.

Attachments:

1. Staff Memo



Vina Groundwater Sustainability Agency
308 Nelson Avenue, Oroville, CA 95965
(530) 552-3592 • VinaGSA@gmail.com

MEMORANDUM

To: Vina Stakeholder Advisory Committee

From: Christina Buck, Asst. Director, Butte County Dept. of Water and Resource Conservation
(providing technical staff support to the GSA)

Date: October 21, 2026

Subject: **Consideration of Local Management Level language in the draft Periodic Evaluation and Amended Groundwater Sustainability Plan**

Background

The public review drafts of the Periodic Evaluation (PE) and Amended Groundwater Sustainability Plan (GSP) were released on September 15, 2026. They are posted online here: <https://www.vinagsa.org/gsp-periodic-evaluation-plan-amendments>. Both include Local Management Levels (LMLs) for the groundwater level sustainability indicator, first introduced in the June 2026 strawman proposal (Amended GSP Section 3.3.4; PE Section 3.1.3). As drafted, LMLs are set 20 feet below the Measurable Objective (MO) at fourteen (14) of the thirty-one (31) groundwater level Representative Monitoring Site (RMS) wells. This approach reflects direction from the Vina Groundwater Sustainability Agency (GSA) and Rock Creek Reclamation District (RCRD) GSA Boards at their August 12, 2026 joint meeting. The drafts also describe the steps the GSAs would take if an LML is reached (Attachment A). On October 14, 2026, the Vina GSA Board referred the LML language, together with consideration of the related Minimum Threshold (MT) and “non-dry year” items, to the SHAC for a recommendation to the Vina GSA Board, which will be brought forward at the Joint GSA Board meeting on November 4, 2026. This memo provides context to support the SHAC’s discussion and recommendation.

Context and GSA Board Direction

Recognition of GSA Board direction is critical context for framing the SHAC’s discussion. On October 14, 2026, the Vina GSA Board recognized the interrelated aspects of key topics that have been the subject of Board consideration as well as considerable public comment. These three key topics include the Minimum Threshold alternatives (primarily ‘Alternative 1’ and ‘Alternative 3’), the ‘non-dry year’ language in the undesirable results definition for several sustainability indicators, and the LMLs (at what level they are set in each RMS well, which RMS wells have them, and the language describing what happens if they are reached). These topics are described in two documents that have been the subject of recent discussion and Board

direction. They are summarized in the table below.

Summary of Options Under Recent Discussion

	Public Review Draft PE and Draft Amended GSP (September 15, 2026)	Alternative 3 (Dr. Todd Greene submission)
Origin and status	Joint GSA Board direction August 12, 2026 - Alternative 1 MT approach with LMLs (Vote: Vina GSA 3-2; RCRD GSA 6-0). Released for public review September 15, 2026.	Submitted as public comment August 3, 2026; presented at the October 14, 2026 Vina GSA Board meeting. Motion to adopt failed (Vina GSA 2-3).
Minimum Thresholds – North and South MAs* (25 RMS wells)	Consistent with the adopted 2022 GSP (Alternative 1): 2022 GSP MTs retained at the original RMS wells; new RMS wells assigned comparable MTs. MO-to-MT range of 53 to 84 feet (average about 65 feet).	MT set 40 feet below the MO at every RMS well.
Minimum Thresholds – Chico MA (6 RMS wells)	At new shallow wells (CMW-102A and SWMW-06A), MT set 30 feet below ground surface (in consideration of Valley Oak rooting depths and depth of monitoring wells) MTs at the four Cal Water wells unchanged from the 2022 GSP	Unchanged.
Local Management Levels – North and South MAs	20 feet below the MO at 14 RMS wells selected for GDE and shallow-well areas, subbasin boundaries, and high domestic well density. (See Attachment D for hydrographs)	15 feet below the MO at all 25 RMS wells. (See Attachment D for hydrographs)
Local Management Levels – Chico MA	None.	None.
RMS wells with LMLs	14 of 31	25 of 31
Action when an LML is reached	Report to SHAC and Boards; investigate cause; technical report; Board considers or directs actions (Amended GSP Section 3.3.4, see Attachment A).	Not specified in the submittal.
*MA=Management Area		

Board Direction

August 12, 2026 - Joint GSA Board Meeting

The Joint Boards gave direction for the content of the public review draft of the Periodic Evaluation and amendments to the GSP: MTs assigned using Alternative 1 (2022 GSP MTs, and comparable MTs for new RMS wells) with LMLs 20 feet below the MOs, with direction to provide prescriptive language on “what would happen if we hit the LMLs and what action would be taken” (Vina GSA Board voted 3-2; RCRD GSA voted 6-0).

October 14, 2026 - Vina GSA Board

The Vina GSA Board revisited topics from the August 12, 2026 meeting and provided the following direction:

- Alternative 3 (MTs 40 feet below the MO; LMLs 15 feet below the MO) did not pass (2-3). The MTs would remain as drafted.
- By consensus (head nods, no vote), the Board preferred LMLs 15 feet below the MO “for all RMS wells excluding wells within the Chico Management Area,” and more prescriptive LML trigger language. It is unclear whether ‘all RMS wells’ means all RMS wells such as is proposed in Alternative 3 or whether they meant all the RMS wells with assigned LMLs (per the draft, this would be the 14 wells).
- The Board gave direction through a 4-1 vote to remove the “non-dry year” language from the Sustainable Management Criteria (SMC).
- The Board voted 5-0 to send items associated with Alternative 3, including LMLs and the non-dry year language, to the SHAC.

These items are interrelated, which is why the Board referred them together. With the MTs unchanged, the LMLs are the GSAs’ early-warning tool within the ‘margin of operational flexibility’; with the non-dry year condition removed, MT exceedances in any water year type would count toward an undesirable result. The SHAC is encouraged to discuss the LMLs in light of the direction provided by the Vina GSA Board on October 14, 2026.

Ultimately, the Joint GSA Boards will confirm and provide direction on these topics and others on November 4, 2026 and may direct revisions to the public review drafts of the Periodic Evaluation and Amended GSP. The final draft documents will be prepared and brought to the Joint GSA Boards to be considered for adoption on December 9, 2026, after coming to the SHAC on November 18, 2026 for final recommendations.

Key Terms for Reference

The following definitions come from Section 3 of the draft amended GSP.

Measurable Objective (MO): the quantitative target above the MT that allows a range of active management to “achieve the sustainability goal and prevent undesirable results”. The range between the MO and MT is referred to as the margin of operational flexibility.

Interim Milestone (IM): targets set in five-year increments offering a path to sustainability.

Local Management Level (LML): 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. Reaching an LML in an RMS well triggers adaptive management and enables early intervention before minimum thresholds are reached.

Minimum Threshold: the quantitative threshold used to define the point at which undesirable results may begin to occur. The GSP describes MTs as “guardrails” and states, *“If observed data trend toward the locally defined MT, this will trigger action on part of the GSAs to reverse this trend before reaching the MT. For this reason, MT are like guardrails. Actions to reverse a trend toward a MT could be taken at any time during GSP implementation that will follow an*

adaptive management process working with stakeholders to ensure actions are implemented at appropriate times.” (2022 Adopted GSP, Section 3.2.2)

Undesirable Result (UR): significant and unreasonable negative impacts, avoidance of which is required by SGMA.

For groundwater levels, an undesirable result *“is experienced if: sustained groundwater levels are too low to provide a water supply of adequate quantity and quality to support rural areas and communities, and the agricultural economic base of the region, or if significant and unreasonable impacts to environmental uses of groundwater occur.... The quantitative Vina Subbasin Undesirable Result for the Chronic Lowering of Groundwater Levels occurs when: Two RMS wells within a management area reach their MT for two consecutive years of non-dry year-types.” (2022 adopted GSP)*

Summary of Public Comments on Local Management Levels

The table below summarizes comments received through October 18, 2026 that address LMLs. Comment form numbers refer to the Periodic Evaluation comments submitted via the online comment form (comments 1–18) attached in full, along with the letter from M. Dunlap and the form letter received via the Vina GSA public comment email from about 50 individuals (see Attachment B).

Theme	What was requested or asked	Source
Where LMLs apply	Expand LMLs beyond the 5 GDE-sensitive areas to all 26 identified polygons (includes Chico MA).	M. Dunlap letter
	LMLs 15 feet below the MO for all RMS wells except the Chico MA	Comment #8; form letter
Chico MA	Introduce LMLs in the Chico MA, set at half the distance between the MO and MT at each well, because MTs there are generally higher.	M. Dunlap letter
Chico Urban Forest Vulnerability Assessment	PE Section 4.5.6 trigger refers to an LML that no Chico MA well has; three options offered. (See Issue #3 below)	City of Chico Urban Forest Manager
LML offset	LMLs 15 feet below each MO.	Comment #5, #8, form letter
Trigger definition	Clarify “persist through multiple observed groundwater measurements across different seasons”: must levels stay below the LML for consecutive seasons? Does a summer-only reading count?	Comment #15
Monitoring frequency	In LML areas of greater sensitivity, measure more often than twice a year.	M. Dunlap letter
Required response	LMLs need a “regulatory hook” that contains a prescription for action by the Vina GSA Board; should trigger a PMA when LML is reached	M. Dunlap letter

Theme	What was requested or asked	Source
	A trigger should automatically require staff to assess impacts to domestic wells and GDEs and recommend defined adaptive management actions to the Board within a specified timeframe; the GSA should not have discretion to simply continue monitoring. Enforceable early-warning mechanism that compels evaluation and corrective action well before a Minimum Threshold is reached	Comment #5, form letter
	Define “adaptive management.”	Comment #15
Support as drafted	Adding LMLs, even without regulatory power, is an improvement that provides early warning and allows citizen input on early signs of GDE stress.	Comment #13

Issues for SHAC Discussion

The following outlines several specific issues the SHAC may wish to discuss and provide specific input and a recommendation to the Board on:

1. **Which RMS wells receive LMLs.** The draft PE assigns LMLs to 14 wells selected for GDE and shallow-well areas, subbasin boundaries, and high domestic well density. The October 14th direction can be read as (a) changing the offset on those 14 wells, or (b) extending LMLs to all 25 North and South Management Area (MA) RMS wells, as in Alternative 3. Public comment asked that LMLs apply to all RMS wells and all 26 polygons (which would include Chico).
2. **The Chico Management Area.** The current proposals exclude the Chico MA. The MO-to-MT range there is narrow (10 to 23 feet at the four Cal Water wells; 13 feet at CMW-102A and SWMW-06A), so a level 15 feet below the MO would fall below the MT at three of the six wells. Public comment suggested Chico MA LMLs set at half the distance between the MO and MT.
3. **Chico Urban Forest Vulnerability Assessment (PE Section 4.5.6; Attachment A).** Formal evaluation is triggered “if a Chico-area or GDE well reaches its LML,” but no Chico MA RMS well has an LML. City of Chico staff identified three options: clarify that “Chico-area well” includes 20K001, which is an RMS well associated with the Vina North MA and has an LML; assign LMLs to CMW-102A and SWMW-06A; or tie the evaluation to a different trigger.
4. **When an LML is triggered.** As drafted, measurements must reach the LML and “persist through multiple observed groundwater measurements across differing seasons.” Public comment asked how many readings, in what sequence, constitute a trigger, and requested more frequent monitoring at sensitive wells.
5. **What must happen once an LML is triggered.** The draft requires reporting to the SHAC and Boards, an investigation of cause, and a technical report, after which the Board “could consider or direct” a menu of actions. Public comment asked that a trigger require an assessment of impacts to domestic wells and GDEs and recommended actions to the Board within a set timeframe, and that “adaptive management” be defined. Which steps should be required, and on what timeline?
6. **Linking Projects and Management Actions (PMAs) to LMLs.** The GSP could more specifically define the observed groundwater level conditions under which a given PMA

would be implemented. The Colusa Subbasin Demand Management Program is one example (Attachment C). Which PMAs, if any, should be tied to LMLs?

Requested Action

Discuss and provide a recommendation to the Vina GSA Board regarding the draft Periodic Evaluation and amended Groundwater Sustainability Plan, specifically related to Local Management Levels and how they are set and what action must be taken if LMLs were reached.

Attachments

- A. LML language as drafted (Amended GSP Section 3.3.4 and related sections)
- B. Public Comments received regarding LMLs
- C. Colusa Subbasin Demand Management Program (example of a groundwater level trigger for a PMA) and excerpt from draft Periodic Evaluation summarizing Vina Projects and Management Actions (PMAs)
- D. Hydrographs from public review draft of the PE and Alternative 3.

Attachment A

Local Management Level Language as Drafted in Amended GSP

Amended GSP Section 3.3.4 “Local Management Levels” (*the same language appears in PE Section 3.1.3*) and other sections in the amended GSP with reference to LMLs (public review draft, September 15, 2026)

From the Executive Summary

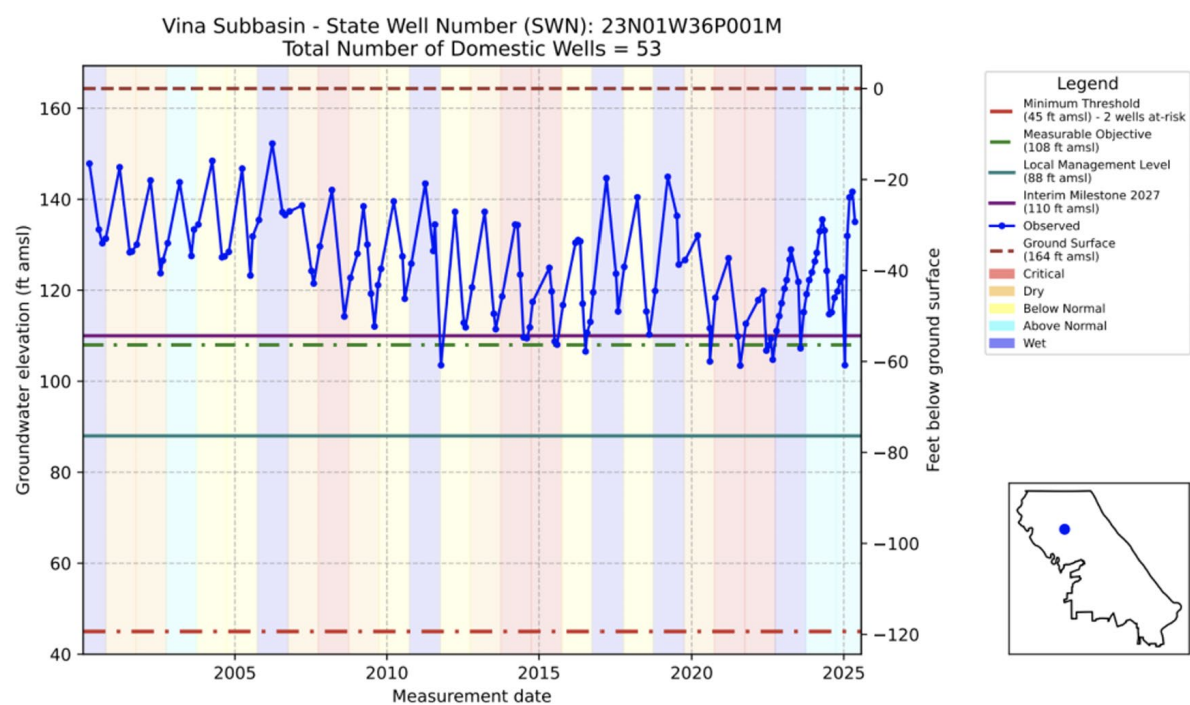


Figure ES-7: Representative Monitoring Site for Groundwater Levels with Relationship of Measurable ~~Objectives~~, Objective, Local Management Level, and Minimum Thresholds, and Operational Range

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. LMLs provide an implementation tool for local management that will 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 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 the LML and persist through multiple observed groundwater measurements across differing seasons (i.e. spring, summer, or

fall), the GSAs will investigate the underlying cause and identify appropriate actions to address and respond to the condition. Additional information on LMLs is provided in Section 3.3.4 of this amended GSP. Table ES-1 shows the LMLs, MOs, IMs, and MTs for groundwater levels at each RMS well. *(page ES-30, redline public review draft of GSP)*

....

3.3.4 Local Management Levels (NEW SECTION)

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 may not necessarily constitute significant or unreasonable conditions. Set at shallower levels than minimum thresholds, LMLs serve as an early warning mechanism that triggers adaptive management and enables early intervention before minimum thresholds are reached. If observed groundwater level measurements reach the LML and persist through multiple observed groundwater measurements across differing seasons (i.e. spring, summer, or fall), then the following actions 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 technical team will investigate whether the condition is due to localized, isolated conditions (ex. well interference) or reflective of broader changes in aquifer conditions
- 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
 - 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)
- Annual Reporting will document the condition and GSA response

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 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.

....

5.3.7 Groundwater Allocation *(new text in blue italics)*

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 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.

Groundwater allocation management actions could include, but are not limited to, targeted maximum extraction levels to address specific MT violations or Vina Subbasin-wide adjustments to extractions to address overall chronic lowering of groundwater levels. Should the GSAs determine that groundwater allocation management actions are necessary, the GSAs will consider such management actions through a public process ultimately decided by the GSA Boards.

...

5.5 Adaptive Management Strategies *(new text in blue italics)*

The GSAs will be requesting annual reports from the project proponents to evaluate progress on implementation. If the projects are not progressing or if monitoring efforts demonstrate that those projects are not achieving their targets, the GSAs will evaluate the need for additional or modified projects and to begin implementation of management actions. *See section 3.3.4 for a description of activities that will occur if a Local Management Level is reached in a Groundwater Level RMS well.*

Excerpt from draft Periodic Evaluation

4.5.6 Chico Urban Forest Vulnerability Assessment

This effort addresses a data gap regarding the extent to which Chico's unirrigated, deep-rooted trees rely on groundwater versus soil moisture and creek recharge, directly supporting DWR Corrective Action 3 for environmental users. The assessment will employ a two-tiered vulnerability evaluation approach: Tier 1 will utilize satellite z-NDVI greenness screening based on the Rohde et al. methodology, while Tier 2 will incorporate the City's tree inventory alongside field checks conducted near shallow, GDE-sensitive RMS wells. Baseline data collection will commence immediately; however, formal evaluation will only be triggered if a Chico-area or

GDE well reaches its Local Management Level (LML). This collaborative effort will be carried out in partnership with the City of Chico Urban Forestry division, the County, and potentially California State University, Chico.

Expected Benefits and Evaluation: This would provide new information that could be used to refine monitoring and groundwater management approaches in the Vina Subbasin.

Attachment B

Public Comments received during public review period of the draft Periodic Evaluation and amended Groundwater Sustainability Plan – September 15, 2026 – October 18, 2026

Public Comment Form Letter

The Vina GSA released the Draft Periodic Evaluation and Draft Amended GSP for public review on September 15, 2026. Between that date and October 18, 2026, the Vina GSA received the form letter reproduced below from about 50 individuals. Some people added personal statements or made small edits or sent reworded versions that make the same requests.

One representative copy is shown below. All individual submittals have been received by the Vina GSA Board members and are kept in the GSA files. The letter provides specific input regarding Local Management Levels (see bold text below).

Dear Vina GSA Board of Directors,

I am a local resident and groundwater user within the Vina Subbasin. The Board's August 12th decision to retain the current minimum thresholds (MTs) and the "non-dry year" provision ignored substantial public input and 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.

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.

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.

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 and those of the Groundwater dependent ecosystems, and many shallow domestic and agricultural wells.

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.

COMMENTS FOR VINA GSA SHAC MEETING
October 28, 2026
Considerations for the Locally Managed Levels (LML)
Submitted by Marty Dunlap

I have lived in Chico for over 50 years and have been following impacts to our local water for over 20 years and offer the following for consideration by the SHAC regarding the proposed use of Locally Managed Levels (LML) with the sustainability management of the groundwater of the Vina Subbasin.

The Strawman proposal, where the use of LML was first introduced, reiterates that the Department of Water Resources' (DWR) Recommended Corrective Actions (RCA) for the Vina Groundwater Sustainability Plan (GSP) lists that the subbasin has a chronic lowering of groundwater levels. The Webster dictionary defines chronic as "recurring often or lasting a long time, as continuing indefinitely, perpetual, constant." Hence the groundwater levels in the Vina Subbasin are a problem and require attention. This is not a passing phase that will rectify itself over time and requires ongoing monitoring.

The Strawman proposal describes the 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. In the LML areas of greater sensitivity, the measurements should be taken more frequently than twice a year. There should be LML 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 introduction of LML sounds like it could be a reasonable compromise for those residents living in the Vina GSA who believe Minimum Thresholds (MT) need to be established more cautiously in the drawing down of the groundwater and those who pump with deeper wells and want to have "operational flexibility."

This might be tolerable except at this point, the LML lack any enforcement criteria. As stated in the proposal, LML lack the "threat" of a regulatory hook. Despite the perplexing concept that providing protections for domestic well users and GDEs would be considered a threat, it seems there needs to be some type of hook which would trigger a locally Planned Management Action (PMA) when a LML is reached.

At this time, 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. 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.

As a reminder, the exclusion of domestic wells put in before 1980 is not reasonable nor justifiable. DWR has communicated that to the Vina GSA. Active wells that precede 1980 need to be accounted for in the mitigation analysis with protection provisions for damages incurred from groundwater depletion. In addition, active domestic wells within the Cal Water service area and the Durham service area need to be included in the analysis. Even with the current exclusion of the pre-1980 wells, and wells within the Durham and Cal Water service areas, which is an additional 2,282 wells, under the current MT or the expanded risk assessment, it puts 24-32% wells at risk of going dry. This

is an unnecessary risk and burden and cost to those living within the Vina subbasin who are dependent on a well for their water.

According to my recent conversation with the DWR Director for the implementation of SGMA, approval of the Vina GSP by DWR is only a **conditional** acceptance. The RCAs are not simply recommendations, they require rectification.

In summary, if the LML approach was to be implemented, it needs to include some kind a “regulatory 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.

Public Comments Received on the Draft Periodic Evaluation and Amended GSP via the online Comment Form

September 15 – October 16, 2026

The following are comments submitted through the [Periodic Evaluation comment form](#) after release of the public review drafts on September 15, 2026, reproduced verbatim (spelling and formatting as submitted). Comments are numbered in order received. 18 comments were received.

Comments related to Local Management Levels (LMLs) are marked “LML-related” and shaded: **Comment 5, Comment 8, Comment 13, Comment 15.**

Comment 1 (Jeanette Alosi) – Received September 16, 2026

I am a domestic well user. I strongly object to using post 1980 drilled wells and the total drilled well depth (rather than the casing depth) to determine the number of vulnerable domestic wells. These omissions drastically underestimated how many wells will fail, threatening property values, small farms and our local economy.

The MO is our sustainable goal. That should be the starting point for determining the MT. Although our aquifer fluctuates annually, the long-term trend shows a steady decline. If our goal is sustainability, the MT must be raised. I support Alternative 3 and urge you to adopt it. Alternative 3 takes all stakeholders and beneficial users into consideration (a DRW recommended corrective action). To reach our sustainability goal, the non-dry year language should be removed.

The allowance to excessively lower the groundwater levels will negatively affect domestic wells, local creeks, riparian habitats and valley oaks. Imagine the devastating impact on Bidwell Park. Chico would no longer be the "City of Trees." I urge you to adopt Alternative 3 and protect all beneficial users.

Comment 2 (Eric Johnson) – Received September 17, 2026

I have three comments:

1) Irrigation efficiency needs immediate action. I live in Durham. Every day this summer I've seen spray irrigation happening during the hot summer afternoons. At least 1¹/₄ of this irrigation water is lost to evaporation. A carrot/stick approach to spray irrigation in general (spray irrigation should be allowed only during forecasted freeze periods), and time of day irrigation (non-daylight hours only) is needed now! This is low-hanging fruit!!!

2) Domestic well loss of use mitigation - we need a concrete, specific plan now. Waiting until wells go dry will be too late. Short term mitigation: Once wells start going dry, there will be an immediate need for alternative water supplies. Where will the water come from? Who will deliver it? What infrastructure will be required? Who will pay for it all? Who will purchase the materials and construct the tank/delivery systems? These questions should be specifically answered now. Longer term mitigation: There will be an immediate overwhelming demand for well replacements (deeper wells). There will not be enough well drillers to provide drilling and installation in a timely manner. Many folks may have to wait in line for years. Who will pay for the new wells, as the average domestic user won't be able to afford it (suggest 91 percent paid by local agriculture groundwater users, and 9 percent paid by domestic well users since those are the current groundwater use rates according to this document)? How will the demand for new wells be met in a timely manner?

3) Proposed Minimum Thresholds are too low. They have been proposed so industrial agriculture groundwater users benefit, and the need for response actions is predicted to be unlikely - at the expense of the public, domestic well users, and the environment. It is not by chance that the proposed MT depths are far below what other GSPs have proposed. The proposed Vina MTs are meant to protect powerful big ag in the area, and to keep the county from having to do much about overdrought - and it has to stop. Public forums and UNBIASED technical advisors are needed to allow a stronger voice in determining appropriate MTs for this area.

Thank you for the opportunity to comment on these important issues.

Comment 3 (Jim Mathys) – Received September 18, 2026

Hello decision makers

I attended the meeting on the evening of September 16th. One of the goals mentioned was reducing water use. The State of California has established the Model Water Efficiency Landscape Ordinance (MWELo) to reduce water use in landscapes. I am a Certified Landscape Irrigation Auditor (CLIA) certified by the Irrigation Association. The implementation of this ordinance is up to the various cities and counties to enforce. This is a great tool for reducing water use. Butte County has not adopted this ordinance and does not require an irrigation audit report to obtain occupancy in new construction and the City of Chico does not either. I find this troubling that such an effective ordinance is not being enforced in the Vina sub-basin. It fits very well into the goals of the GSA. Can you explain why this has not been adopted and is not part of the plan going forward? It was not discussed at the meeting. I look forward to your response.

Comment 4 (Eric Nilsson) – Received September 19, 2026

Dear Board Members

I'm going to zoom out a bit and begin by stating the obvious. The climate is changing, more specifically, it is warming, and, in the near future, will continue warming leading to increased temperatures, longer summers, faster snow melts, and periods of extended drought.

And that means less water.

It is one thing to know that and continue doing the things we have been doing. It is quite another to know that and adapt to the new conditions we find ourselves in –all of us... together.

Adapting means a change of mindset, perspective. That means shifting the balance from extraction towards stewardship, protection, and preservation of our water and our groundwater dependent ecosystems. I think of these systems, really, as the living world, the world that sustains us, the world, that without it, we would not have the means to exist.

Adapting also means using less water and letting go of short term gain or profit and embracing the long view, the view that says we sacrifice for our children and our children will learn to do the same for their children.

And adapting means understanding the value and the power of community, understanding the importance of taking care of each other, not just the interests of the monied minority. Industrial agriculture, especially almond and rice in our region, consume 90% of our groundwater, leaving just ten percent for the entire population of Chico.

In 2024, almond production in Butte County generated approximately \$122.5 million in gross agricultural value. The large growers could certainly cut back water usage and still generate adequate profits.

Sacrifice. Growers can accept less and still make more than enough. And they can do that in the interests of their children and our children and future generations.

This is the measure of leadership - leadership that demonstrates integrity and courage. And that means protecting our precious water...for ALL. And that means setting measurable objectives and minimum thresholds consistent with GDE standards to insure the long-term sustainability of Bidwell Park and our urban forest. After all, we ARE the city of trees.

And yes. proudly, we are the city of trees. And we want it to continue in perpetuity. Our quality of life depends on it. So I urge you to make decisions to protect and preserve our groundwater and to insure that there isn't any chance for degradation or loss of our urban forests, parks and groundwater dependent ecosystems.

Thank you.

Comment 5 (Sharon Fritsch) – Received September 21, 2026 ■ **LML-related**

Dear Vina GSA Board of Directors,

I am a local resident and groundwater user within the Vina Subbasin. The Board's August 12th decision to retain the current minimum thresholds (MTs) and the "non-dry year" provision ignored substantial public input and 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.

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.

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.

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.

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, Sharon Fritsch

Comment 6 (Melanie Figueroa Mendez) – Received October 6, 2026

I enjoyed seeing a perspective from an actual “small farmer” and how this has effected her and her family.

Comment 7 (Jennifer Harris) – Received October 6, 2026

The measureable objectives of the groundwater should reflect DROUGHT YEARS. the current proposed lower levels are unacceptable. Please respect the recharge of water in our changing climate. Keep the water IN Vina. Do not turn this region into an Owen’s Valley!

Comment 8 (Lindsay Briggs) – Received October 6, 2026 ■ **LML-related**

The Sub-Basin should be revised with a third proposed alternative:

- Don’t use domestic the well database as the proxy
- Consistently set MT at 40 feet below MO (which is twice the historical range)
- Leave Chico Management Area MTs where they are (they are already set at 21 feet below MO)
- **Have Local Management Levels (LML) 15 feet below MO for ALL RMS wells (except Chico Management Area)**
- This proposal puts 6% (95 of 1472) of domestic wells "at-risk of going dry" rather than much more under proposal 1 or 2

Comment 9 (Loree Monroe) – Received October 7, 2026

The citizens of Chico need more input and consideration into the GSA's decision. There should be another representative from Chico, some one to speak for the trees, not just for the well owners. I pay property tax to support Vina GSA, but have little voice on it's board. More data is needed about the effects of the groundwater goals set by Vina GSA on the private wells (and all wells, not just those built after 1980) and on the trees of Chico.

Comment 10 (Kristen James) – Received October 7, 2026

Dear Vina GSA,

I am a science teacher in Butte County. My educational and professional background has involved agriculture, classroom education, and grant funded projects on the Iron Canyon project. Teaching and understanding our Hydrologic cycles is pivitol for our community and world. The biggest point of right now is to understand the sacred and slow process of groundwater recharge. Using or re-allocating water now is in line with taking money from the bank without ever putting it back. Infiltration takes 1000s of years. The fact that we are residents in a place where Earth systems allowed for our current benefit is a situation to

be appreciated and not taken advantage of. We cannot think like short term economists. This is water we are talking about - we need to think about this precious resource that is worth and will be worth more than anything in our future. Consider understanding our resources and Earth cycles first.

Comment 11 (Kim Hamberg) – Received October 10, 2026

Minimal water table levels are NOT acceptable. Chico is growing and with that comes a higher demand for water. Please do not let our small town and small farmers die. Preserving a higher ground water table will protect the future sustainability of Chico.

Thank you for your attention to this matter

Comment 12 (Patricia Dobson) – Received October 12, 2026

As one of the domestic well owners here in Chico, California you have chosen to selectively not include my well and many of my surrounding neighborhoods wells from the true actual count of domestic wells in Butte County. These homes domestic wells will have their operational life shortened and will go dry due to your lowered MT levels. Some of these homes with domestic wells are located directly next to Bidwell Park. If these wells are allowed to go dry then what is also the effect that is occurring at the same time to the surrounding Valley oak trees, Sycamore trees, Willows and other flora life of Bidwell Park, the creek, and the urban forest and tree canopy of Chico when the ground water levels have dropped to your plans unsustainability levels?

Comment 13 (Jim Pushnik) – Received October 13, 2026 ■ **LML-related**

Having reviewed the clean updated plan pdf and the redline version of the previous draft several aspects have been clarified, and improved. These are: 1) increase in the monitoring network and removal of inconsistent wells (more and better data is always better for decision making); **2) addition of the local management level, even without regulatory power, which will provide an early warning and allow for citizen input to the regulators of early signs of groundwater dependent ecosystem stress;** 3) increased monitoring of stream flow will also provide an early indication of changes in surface water availability. These are clear improvements in this draft.

The major shortfall in the current plan still revolves around the establishment of the minimum threshold (MT), which has been brought up at every public input meeting I have attended and is unchanged in this document. The current document clearly states the sustainable management goals are “to ensure groundwater managed to provide water supply of adequate and quality to support rural areas and communities, the agricultural economic base of the region and environmental uses now and in the future (Pg. 201) avoiding undesirable results. Undesirable results are defined in the document as a point when water supply is “unable to provide adequate supply and quality” equably to these water-use sectors, without prioritize any one sector. The document further states “protection of domestic wells was therefore deemed to be additionally protective of other well types, such as agricultural wells (Larry Walker Associates Pg. 204). In contrast the currently proposed MT is at odds with this guiding principle of protecting domestic wells and sets the depth at a level that threaten rural communities, many domestic wells, as well as groundwater and surface dependent ecosystems.

Early in the public discussions a scenario referred to as “ Alternative 3” proposed to set the MT at a level 40 feet below the historically established management objective, with 5 year intermediates measures (IM’s) that allowed for flexible strategies to meet changing conditions. This strategy would provide the optimum adaptive management of this shared resource and provides parity with the adjacent sub-basin

that have set their MT's at level substantially higher than being proposed in this document. I strongly urge you to reconsider and adopt the Alternative 3 approach as a precautionary governance strategy to protect the quality of life and long-term prosperity of the Vina sub-basin.

Respectfully submit.

Comment 14 (Anne Dawson) – Received October 13, 2026

2.2.4.1 RCA 1c. Downstream domestic well owners must undertake testing for contaminants and hydrogeologist input to obtain a permit for a replacement well. Wells have to be much deeper. These requirements result in an approximate doubling of the cost of a new well.

Comment 15 (Anne Dawson) – Received October 13, 2026 ■ **LML-related**

3.3.4

1) What is the definition of “adaptive management”?

2) Please clarify “persist through multiple observed groundwater measurements across different seasons.” Does this mean that the groundwater level must remain below the LML for consecutive seasons of the year? For instance, if the summer level is below the LML is it regarded as a trigger only if it persists through fall and the next spring? What happens if it is only the summer level that is below the LML?

Comment 16 (Crystal Bag) – Received October 14, 2026

From a business perspective, employees who have land rely on their groundwater for wells that are being affected by this continuous reduction. It is CRITICAL that you take a stand for Chico citizens' expectations that their wells won't run dry because of big agriculture "up the road" - please demand that Vina adheres to deeper groundwater so people can continue to live AND WORK in our community. Thank you!

Comment 17 (Kimberlee Michl) – Received October 14, 2026

Dear Vina GSA,

I am writing to you due to my concerns regarding low minimum thresholds and the foreseeable impacts: domestic wells going dry, groundwater dependent ecosystems suffering like valley oaks, land subsidence, and general uncertainty and additional unforeseen consequences from low groundwater levels. I am reaching out to urge the agency to both raise the minimum thresholds and remove the non dry year language from the plan. Along with incorporating Todd Greene's proposed methodology of raising the MT's to a buffer of 40 feet below Measurable Objectives (MOs). This option allows for operational flexibility and drought years and is generously compromising.

There needs to be a new methodology explored for setting MO's that doesn't require our entire region (communities and ecosystems alike) to adapt to permanent drought conditions. Agriculture should adapt before forcing permanent degradation to our subbasin and surrounding environment. The vina gsa Board should come up with creative solutions to incentivize cover crops, precision irrigation, and native wetland and vegetation restoration. MO's are currently set at or below all time historic lows where we've already seen domestic wells go dry and families need drought assistance and surface water become disconnected, impacting ecosystems and habitats that are vital for aquatic life, fish, and riparian vegetation. 100,000 people shouldn't have to accept a drier browner less vital future so a few hundred people don't have to

adopt common sense practices that will reduce groundwater demand, improve soil and ecosystem health. It's better for farmers and it's better for everyone.

It is my understanding the board has set the minimum thresholds at their current level because we just "don't know what will happen." Finding out by trial and error feels like an unnecessary, and frankly unwise, risk.

When I attended the public meeting on September 16th, I left the meeting with 1 overarching take away: The decisions of the board are not to protect the groundwater for the GDE's and future generations alike, but rather to push the subbasin to its limits, extracting water right up until the point of damage, and only then course correcting. If we can't trust you to have the best interests of the sub-basin in mind, how can we trust you'll act with the urgency necessary to adequately correct your mistakes? With the board signing off on the possibility of 1/3rd of domestic wells going dry, I am here to say you do not have my trust.

Again, I urge you to listen to the voices of the people who are advocating for the protection and stewardship of our groundwater. Increase the minimum thresholds and remove the non dry year language from the plan.

Water is more than a resource to extract. Water is the very foundation of life and belongs to every living being we share this planet with.

Thank you for your consideration and I look forward to seeing the board act with the integrity needed to fulfill its original purpose: safeguard our groundwater for present and future generations alike.

Comment 18 (Marianne Paiva) – Received October 14, 2026

To the Vina and Rock Creek Groundwater Sustainability Agencies:

I am submitting this comment regarding the decision to retain the existing groundwater-level Measurable Objectives (MOs).

My concern is simple: The MOs closely resemble groundwater conditions we already experienced during drought - and we already saw impacts at those levels.

At the 17 original Representative Monitoring Site wells, 9 MOs are at or below the historical low and another

7 are within 10 feet of it. Most of those lows occurred during the 2012-2016 or 2020-2022 droughts.

These are not merely emergency levels. They are the groundwater levels the plan proposes to manage toward over time.

That matters because we know what happened when groundwater approached those levels.

During 2021 and 2022, domestic wells across Butte County went dry or lost capacity. County records document 44 dry-well reports in 2021 and 34 more by late August 2022. In the Chico area, 33 households were connected to Cal Water after private wells went dry or lost capacity.

The same period showed widespread shallow-groundwater stress.

Vina's 2026 Groundwater Dependent Ecosystem Technical Study identified 464 likely groundwater-dependent

ecosystems under typical spring conditions. Under spring 2021 conditions, 400 of those 464 sites - 86 percent -

had groundwater deeper than the study's rooting-depth thresholds. Vegetation-condition indicators also declined in 2021 and 2022 and rebounded during wetter years.

Importantly, the RMS wells with valid spring 2021 readings were still above their adopted MOs.

That is the issue.

The deeper monitoring wells could remain above the MO while domestic wells were failing and shallow groundwater was already out of reach for most likely groundwater-dependent ecosystems.

I am not arguing that the MOs caused every dry well or ecological impact. I am asking whether the evidence

shows that groundwater levels near the MOs are protective.

For Chico, this is not an abstract argument about monitoring-well numbers.

It is about Bidwell Park, valley oaks, riparian corridors, creeks, parks, Chico's urban forest, rural households on shallow wells, small farmers, and the aquifer beneath all of it.

The Periodic Evaluation is supposed to consider what we have learned since the original GSP was adopted.

We now have evidence from the 2021-2022 drought, domestic-well impacts, additional groundwater monitoring, and the new GDE study.

Yet the MOs remain unchanged.

Before adopting the amended GSP, I ask the Joint GSA Boards to reconsider the existing MOs or clearly explain why groundwater levels associated with documented drought impacts should still be considered appropriate long-term management objectives.

The question is not how low groundwater can legally go.

The question is whether these are the groundwater conditions we should call successful management.

Attachment C

- Colusa Subbasin Groundwater Demand Management Program Flyer
- Excerpts - Projects and Management Actions from the draft Periodic Evaluation (public review draft, September 15, 2026)

GROUNDWATER DEMAND MANAGEMENT PROGRAM ROADMAP



INITIAL AND REVISED GSP DEVELOPMENT

The CGA and GGA submitted the initial Colusa Subbasin GSP to the California Department of Water Resources (DWR) in 2022. After DWR issued an incomplete determination, the agencies revised the GSP in 2024 with updated information and commitments, and received DWR approval in 2025.

GDM PROGRAM DEVELOPMENT

The GDM Program uses adaptive management to assess voluntary and mandatory measures as subbasin conditions change. A tiered trigger-and-action system identifies when management actions are needed to achieve sustainability goals. More information on triggers and associated GDM actions can be found on the next page.

WE NEED YOUR FEEDBACK

Community input is essential for developing a GDM Program, and associated WAS, that is transparent, practical, responsive to local needs, and effective.

2014

2022-2025

2025

2026

Late 2026

Moving Forward

SGMA BACKGROUND

California enacted the Sustainable Groundwater Management Act (SGMA) in 2014 to establish a statewide framework for sustainable groundwater management. The Colusa Groundwater Authority (CGA) and Glenn Groundwater Authority (GGA) are the local Groundwater Sustainability Agencies (GSAs) responsible for jointly managing the Colusa Subbasin under SGMA. As part of SGMA, the GSAs are responsible for submitting a Groundwater Sustainability Plan (GSP) for the Colusa Subbasin.

GDM AND DWM PROGRAMS

The CGA and GGA committed to developing two programs for the Colusa Subbasin:

- **Groundwater Demand Management (GDM)** – The GSAs committed to developing and implementing the GDM Program by January 1, 2027, if needed, to mitigate overdraft, groundwater level declines, and subsidence through 2042.
- **Domestic Well Mitigation (DWM)** – The GSAs fulfilled their commitment to develop and implement the DWM Program by January 2026. The program is now active throughout the Colusa Subbasin.

DRAFT WATER ACCOUNTING STATEMENTS

The Water Accounting System (WAS) is a key component of the GDM Program, providing transparent, consistent information to support groundwater management. As an initial step, landowners will receive annual statements estimating Net Groundwater Impacts (NGWI) for each water year (October through September). Please provide your email address to your local GSA to receive these statements electronically.

Scan or click the QR codes to learn more about the Colusa Subbasin, WAS, and the GDM program.



Colusa
Groundwater
Authority



Glenn
Groundwater
Authority



Water Accounting
Statement Explainer
Video

CONTACT US

CGA - CThomasKeefer@rgs.ca.gov

GGA - LHunter@countyofglenn.net

GDM TRIGGERS AND ACTIONS

GDM Program triggers will be based on groundwater level and subsidence thresholds designed to support adaptive management before undesirable results occur. In response to these triggers, the GSAs will implement a range of actions, beginning with voluntary measures that incentivize groundwater use reductions (i.e., GDM Actions 0 and 1) and progressing, if necessary, to mandatory measures such as groundwater fees and allocations (i.e., GDM Actions 2 and 3). This adaptive approach provides flexibility while ensuring groundwater demand reductions align with basin conditions and sustainability objectives.

DRAFT SUSTAINABILITY INDICATOR TRIGGER AND GDM ACTION SUMMARY								
Sustainability Indicator	GDM Action 0	Trigger 1	GDM Action 1	Trigger 2	GDM Action 2	Trigger 3	GDM Action 3	SWRCB Intervention
Groundwater Levels/Storage	Implement WAS; continue PMAs, maximize State & Federal funds; coordinate voluntary landowner efforts;	12.5% (6) RMS Wells reach the early warning level (50% between MO and MT) for 2 consecutive fall measurements.	Continue GDM outreach and education; encourage voluntary GDM actions;	12.5% (6) RMS wells below 75% between MO and MT for 2 consecutive fall measurements.	Implement groundwater fees for GDM actions; continue GDM outreach and education; implement other strategic actions to prepare for GDM Action 3.	12.5% (6) RMS wells below MT for 2 consecutive fall measurements.	Implement groundwater allocation of sustainable yield, including considerations that may include transitional water, carryover, penalties, water markets, and related policies.	Administrative fees: \$300/Well/Year and \$20/AF of Groundwater Extracted (Probationary Subbasin). Enforcement – Including consideration of extraction limits, large penalties, and unknown SWRCB actions.
Cumulative Subsidence (Since January 2024)	implement GDM outreach program, and fully prepare for GDM Action 2 and Action 3.	> 0.5 ft at 3 contiguous sections within 1,000 ft of critical infrastructure.	implement other strategic actions to prepare for GDM Action 2.	> 1.0 ft at 2 contiguous sections within 1,000 ft of critical infrastructure.		> 2.0 ft for any sections.		
Annual Subsidence	Same as above.	> 0.10 ft/year at 6 contiguous sections for 2 consecutive years.	Same as above.	> 0.10 ft/year at 8 contiguous sections for 2 consecutive years.	Continue GDM outreach and education with specific focus on contiguous sections experiencing >0.10 ft/year of annual subsidence.	> 0.10 ft/year at 10 contiguous sections for 2 consecutive years.	Continue GDM outreach and education with specific focus on contiguous sections experiencing >0.10 ft/year of annual subsidence.	

FREQUENTLY USED ABBREVIATIONS

AF – Acre Feet
CGA – Colusa Groundwater Authority
DWM – Domestic Well Mitigation
DWR – Department of Water Resources
FT – Feet or Foot
GDM – Groundwater Demand Management
GGA – Glenn Groundwater Authority

GSA – Groundwater Sustainability Agency
GSP – Groundwater Sustainability Plan
MO – Measurable Objective
MT – Minimum Threshold
NGWI – Net Groundwater Impact
PMA – Project & Management Actions

RMS – Representative Monitoring Site
SGMA – Sustainable Groundwater Management Act
SWRCB – State Water Resources Control Board
WAS – Water Accounting System

Table 4-1. Projects and Management Actions Summary Table

Name	Description	Targeted Sustainability Indicator	Status	Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Accrued Benefits at Completion
Agricultural Irrigation Efficiency (5.2.3.1)	Recommendations from the Precision Irrigation Pilot Study wide survey has been made available to the local agricultural community. Implementation of the practices will be voluntary, and the goal is reducing groundwater demand by modernizing on-farm irrigation systems.	Groundwater Levels; Groundwater Storage; Water Quality; Land Subsidence	In-progress	Precision Irrigation Pilot Study has been completed. Future implementation to occur as feasible.	Reduction in groundwater demand in the subbasin.	Adoption of more efficient practices could reduce groundwater demand by up to 2%, or about 4,000 AFY.

Name	Description	Targeted Sustainability Indicator	Status	Schedule	Benefits Observed Date or Anticipated Benefits	Estimated Accrued Benefits at Completion
Residential Conservation (Cal Water) (5.2.3.2)	Implementation water conservation practices in accordance with the 2020 UWMP by municipal water suppliers. Some of these conservation projects include: -installation of low flow fixtures -toilet replacements -urinal valve and bowl replacements -clothes washer replacements -residential conservation kits -smart controllers -high efficiency irrigation nozzles -water waste prevention ordinances -metering -conservation pricing -public education and outreach -distribution system loss assessment	Groundwater Levels; Groundwater Storage	In-progress	Began in 2022, complete by 2025.	Conservation programs have resulted in reductions in urban pumping to the order of 50.5 AF in 2022, 100 AF in 2023, and 0.2 AF in 2024. Annual water savings compared to 2021 water usage equate to roughly 150 AFY.	Based on current estimates, the project will have saved a total of ~500 AF by the end of 2025. The current water savings estimate of 150 AFY meet the original goal of 100 to 200 AFY.

Name	Description	Targeted Sustainability Indicator	Status	Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Accrued Benefits at Completion
Scoping for Flood MAR/Surface Water Supply and Recharge (5.2.3.3)	GSAs will expand on the Flood MAR initiative, which was originally developed by DWR to promote recharge programs that use fields, recharge basins, and/or recharge ponds to divert high flows in creeks and streams. Individual recharge projects will eventually occur, following the guidance from completed feasibility and pilot program studies. These studies identified areas of greatest need and locations where recharge projects are the most feasible. The GSAs will seek grants and other funding sources to implement these identified projects. Interested landowners would be identified and participation in the program would be voluntary.	Groundwater levels; Groundwater storage	In-progress	Feasibility and Pilot Program studies completed.	Reduction in pumping and increase of groundwater levels.	N/A

Name	Description	Targeted Sustainability Indicator	Status	Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Benefits Accrued Benefits at Completion
Rangeland Management and Water Retention (BCCER) (5.2.4.6)	Under this project, CSUC and Chico State Enterprises would initiate a study of adaptive/regenerative grazing practices on 2,000 or more acres in the region. The study, which would take place between 2021 and 2022, would measure soil compaction, erosion, groundwater retention, and biological diversity. If this study finds that water retention engineering projects would be feasible in the region, based on the collected data on local soil, then CSUC would create a master management plan and take necessary steps to complete the water retention projects. This project would take place in two locations across 3,850 acres of historical rangeland between Musty Buck Ridge and Cohasset Road.	Groundwater levels	In-progress	This project is currently in the initial planning stages.	N/A	To be determined
Extend Orchard Replacement (5.2.5.1)	A program would be developed that would incentivize local growers to increase the duration of their current fallowing practice between orchard removal and replanting by one growing season. The program would temporarily reduce groundwater demand, possibly reduce the need for soil treatments such as fumigation, and expand recycling options for the previous orchard. Participation would require incentives and be voluntary.	Groundwater Levels	Potential	Program development began in 2024 for the Vina Subbasin. Implementation schedule is TBD.	Reduction in groundwater demand in the subbasin.	Up to 10,000 AFY

Name	Description	Targeted Sustainability Indicator	Status	Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Benefits Accrued at Completion
Agricultural Surface Water Supplies Project (5.2.4.2)	Under this project, surface water from water right holders in the neighboring Butte Subbasin and the upper watershed would provide water for the Vina North and South areas. Some of these surface water sources would include the Sacramento River and Lake Oroville. Surface water would help agricultural users reduce their groundwater usage. Agricultural users may need to install a dual irrigation system that allows them to switch between groundwater and surface water depending on the availability of the surface water. Implementation of some of the projects could also lead to recharge opportunities, as additional water may be available during the off-peak irrigation season.	Groundwater Levels	Potential	Surface Water Supply Feasibility Study completed.	N/A	8,370 to 10,470 AFY
Surface Water Supply and Recharge (5.2.4.8)	Projects under this category would involve activities that increase the surface water supply to the Vina Subbasin through: 1) direct application of surface water to crops along the lines of the Agricultural Surface Water Supplies Project described above; 2) application of surface water and/or flood water to land surface (i.e. existing orchards) for recharge purposes, sometimes referred to as Flood MAR projects; 3) surface water and/or flood water application to recharge basins and/or recharge ponds; or 4) other applications.	Groundwater Levels	Potential	Lindo Channel Feasibility Report Completed.	N/A	N/A

4.5 Other Projects

There are currently eight projects from the 2022 GSP classified as other projects including:

1. City of Chico Wastewater Recycling (GSP Section 5.2.4.5)
2. Paradise Irrigation District Intertie (GSP Section 5.2.4.1)
3. Community Water Education Initiative (GSP Section 5.2.3.4)
4. Fuel Management for Watershed Health (GSP Section 5.2.3.5)
5. Removal of Invasive Species (GSP Section 5.2.4.7)
6. Streamflow Augmentation (GSP Section 5.2.4.3)
7. Recharge from the Miocene Canal (GSP Section 5.2.5.2)
8. Community Monitoring Program (CSUC) (GSP Section 5.2.4.4)

Status of other projects are provided in **Table 4-2**. The GSAs do not rely on these projects to achieve sustainability in the Subbasin; however the GSAs recognize that these activities/projects being pursued and implemented by other entities remain valuable efforts that support local water resource management, monitoring and data analysis, or tangentially benefit groundwater conditions.

Table 4-2. Status of Other Projects

Name	Description	Status
City of Chico Wastewater Recycling (GSP Section 5.2.4.5)	This project would divert treated wastewater, that would otherwise be pumped into the Sacramento River, towards recharge ponds and non-crop vegetation. This would increase groundwater recharge, decrease groundwater demand for farming, and help groundwater levels stabilize in the region.	The City of Chico has funded and initiated a Recycled Water Feasibility Study (RWFS). The RWFS is scheduled to be complete by 2027.
Paradise Irrigation District Intertie (GSP Section 5.2.4.1)	This project will allow PID to provide a surface water source to the City of Chico to help offset groundwater demand. Groundwater is currently the only source of water for Chico.	Not being pursued at this time.
Community Water Education Initiative (GSP Section 5.2.3.4)	This project would expand the education and outreach on important watershed and groundwater issues in the region, helping community members better understand their role in sustainable water management.	No status update reported.
Fuel Management for Watershed Health (GSP Section 5.2.3.5)	This project would involve fuel management in the Upper Watershed, including multiple sites on the 3,950-acre Big Chico Creek Ecological Reserve, 1,500 acres above the Reserve in the Big Chico Creek Watershed, and on private land within the watershed.	Not being pursued at this time.

Name	Description	Status
Removal of Invasive Species (GSP Section 5.2.4.7)	The removal of invasive species would benefit the natural ecosystem and prevent them from negatively affecting the amount of available water and the ability for water to recharge.	Two springs enclosures were developed at just over ~10 acres and invasive species removal within those enclosures occurred.
Streamflow Augmentation (GSP Section 5.2.4.3)	Under the management of the Vina GSA, this project would transport excess untreated surface water from PID, PG&E, and / or other water right holders in the upper watershed to various parts of the Vina Subbasin through creeks and streams.	Waiting on CDFW access approval.
Recharge from the Miocene Canal (GSP Section 5.2.5.2)	This project would rebuild the upper Miocene Canal and making improvements to the overall system would increase recharge into the Vina South Subbasin and surface water availability for other uses.	Not being pursued at this time.
Community Monitoring Program (CSUC) (GSP Section 5.2.4.4)	This project would create routine water table monitoring programs for approximately 8,000 acres of Ecological Reserves in the region between lower Forest Ranch and Cohasset Road near Chico Airport, including the Big Chico Creek, Sheep Hollow, and Cabin Hollow tributaries.	No status update reported.

The following new projects have been added as other projects:

1. Lindo Channel Recharge – Multi-Benefit Plan for Five Mile
2. Lindo Channel Multi-Benefit Stormwater Recharge Initiative
3. Biomass and Biochar Utilization for Demand Management, Regenerative Agriculture, and Multibenefit Recharge
4. Local Refinement of GDE Mapping with Place-Based Monitoring Plan
5. Community Science, Watershed Stewardship, and SGMA Implementation Support Program
6. Chico Urban Forest Vulnerability Assessment

The added projects are further described in Section 4.5.1, 4.5.2, and 4.5.3; respectively.

4.5.1 Lindo Channel Recharge – Multi-Benefit Plan for Five Mile

In June 2026, the Vina GSA completed the “Project Feasibility and Alternatives Report -Feasibility of Enhanced Recharge in the Lindo Channel”. Importantly, to accrue any recharge benefits in Lindo Channel, changes in operation of the Big Chico Creek Gates (a part of the flood management facility located in the Five Mile Recreation Area) will need to occur while also addressing the dynamic gravel/cobble-bedded channel inside the flood management facility which govern flows diverted to Lindo Channel. To enable a recharge project in Lindo Channel, the conditions of the channel inside the facility will need to be monitored and maintained to enable and quantify recharge. Related, Butte County is

Attachment D

Hydrographs from

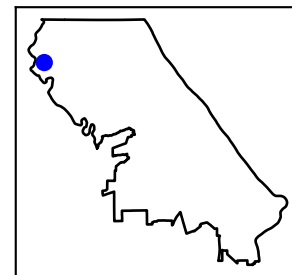
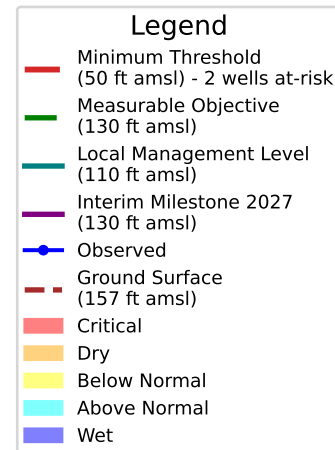
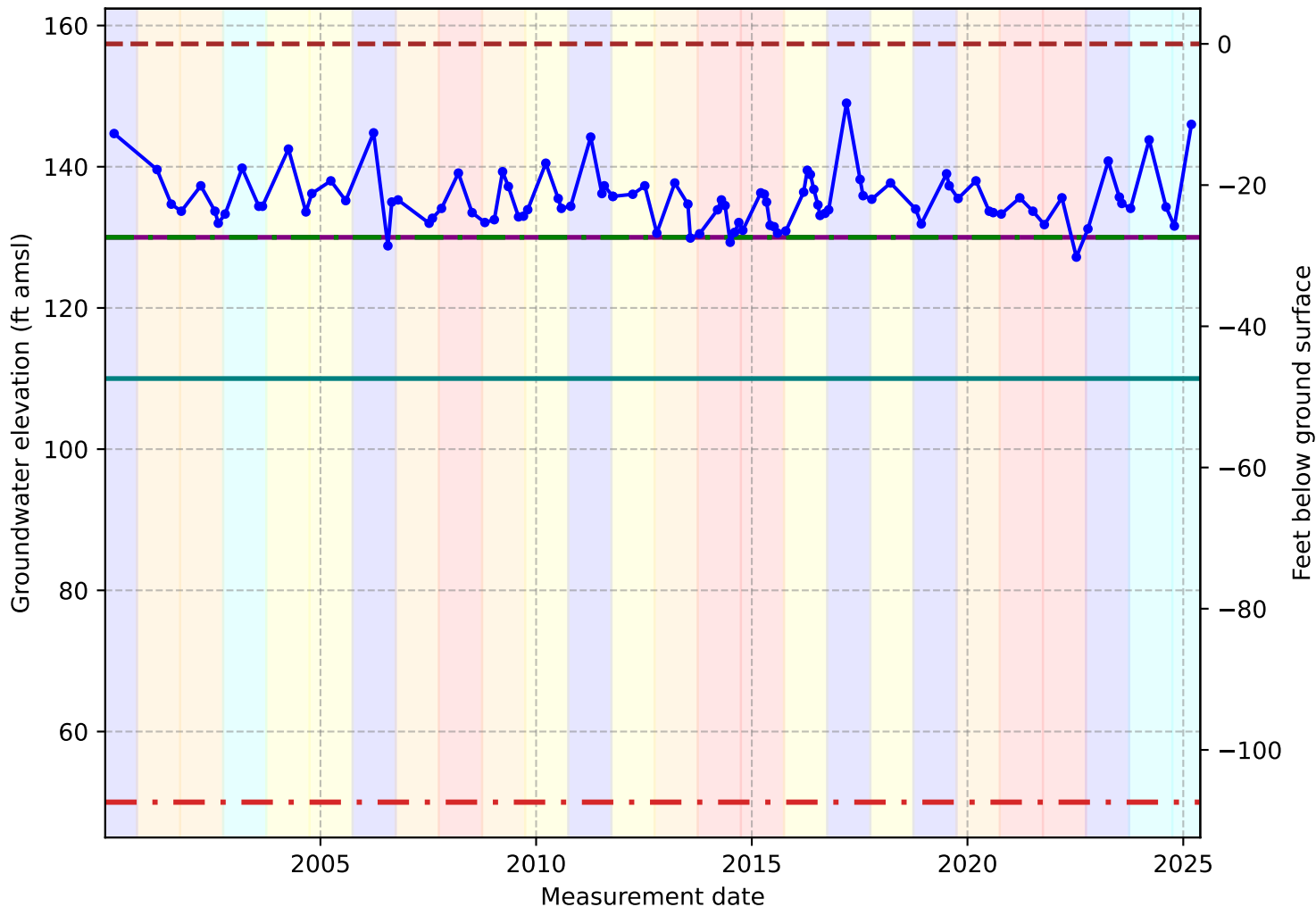
1. Public review draft of the Periodic Evaluation (released September 15, 2026) – shows LML at 20 feet on 14 wells in the North and South Management Areas
2. Alternative 3 – shows LML at 15 feet on RMS wells in North and South Management Areas (25 wells)

ATTACHMENT A

HYDROGROGRAPHS FOR GROUNDWATER LEVEL RMS WELLS

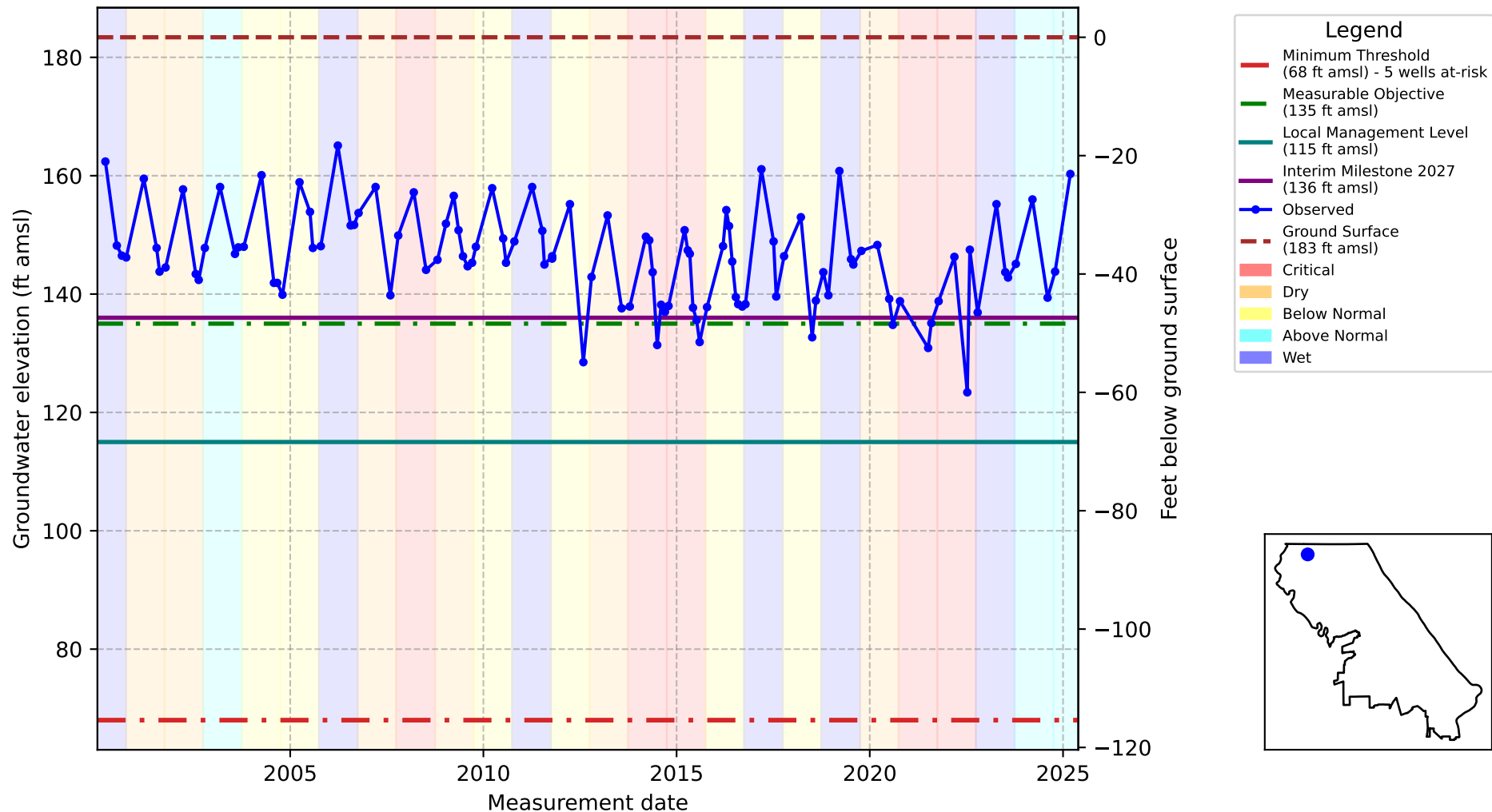
Vina Subbasin - State Well Number (SWN): 23N02W25C001M

Total Number of Domestic Wells = 6



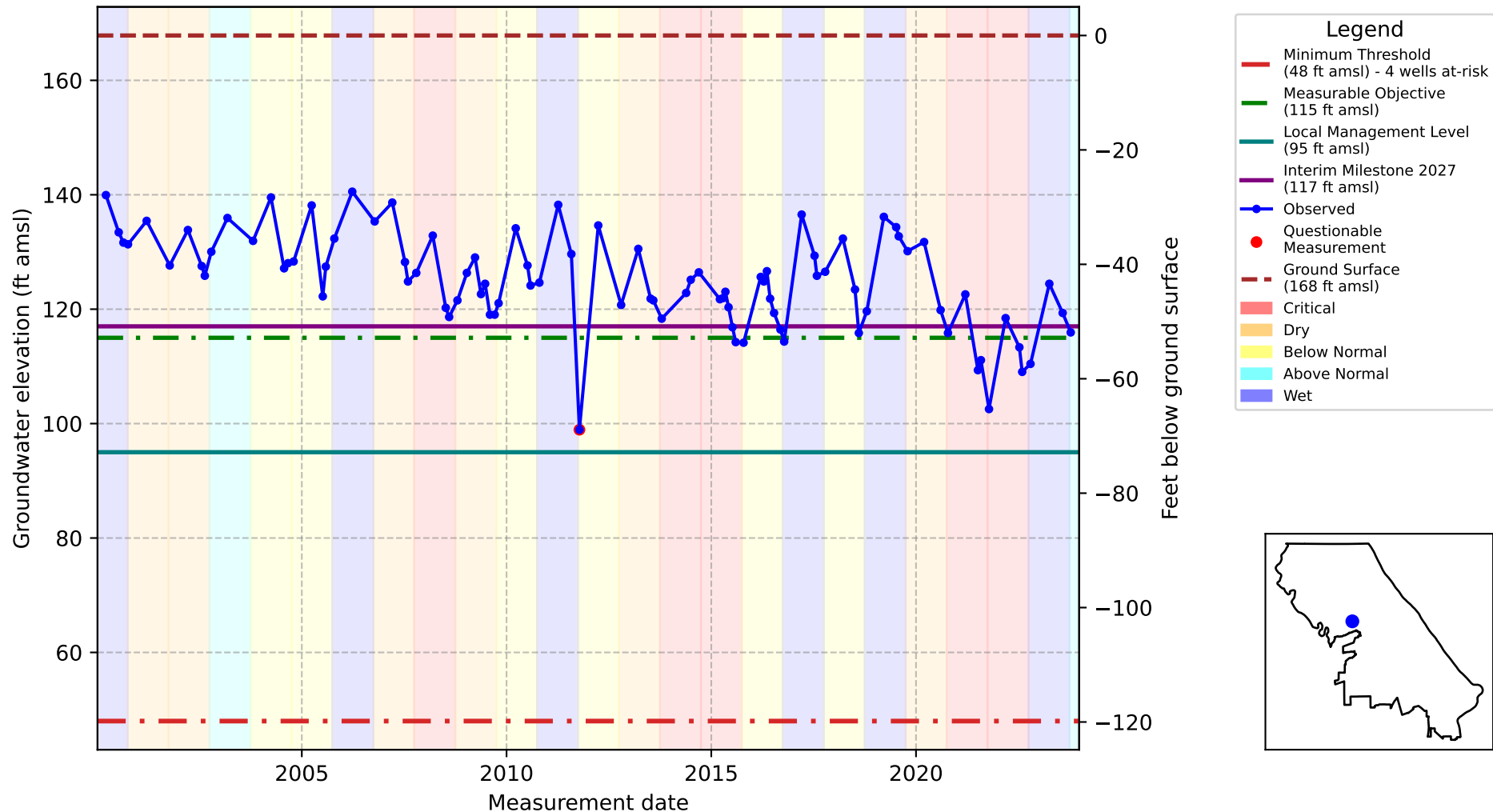
Vina Subbasin - State Well Number (SWN): 23N01W09E001M

Total Number of Domestic Wells = 12



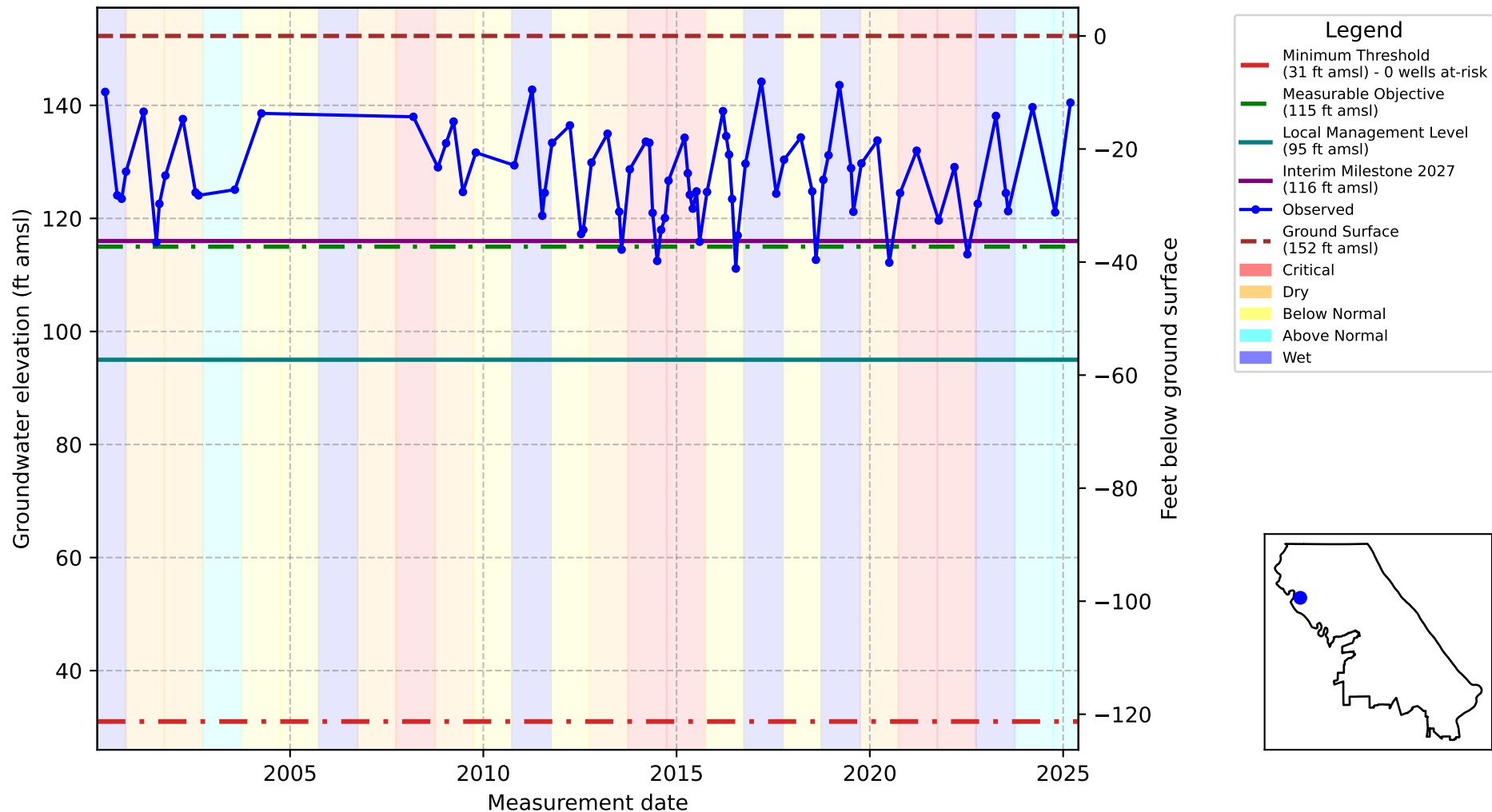
Vina Subbasin - State Well Number (SWN): 22N01E20K001M

Total Number of Domestic Wells = 108



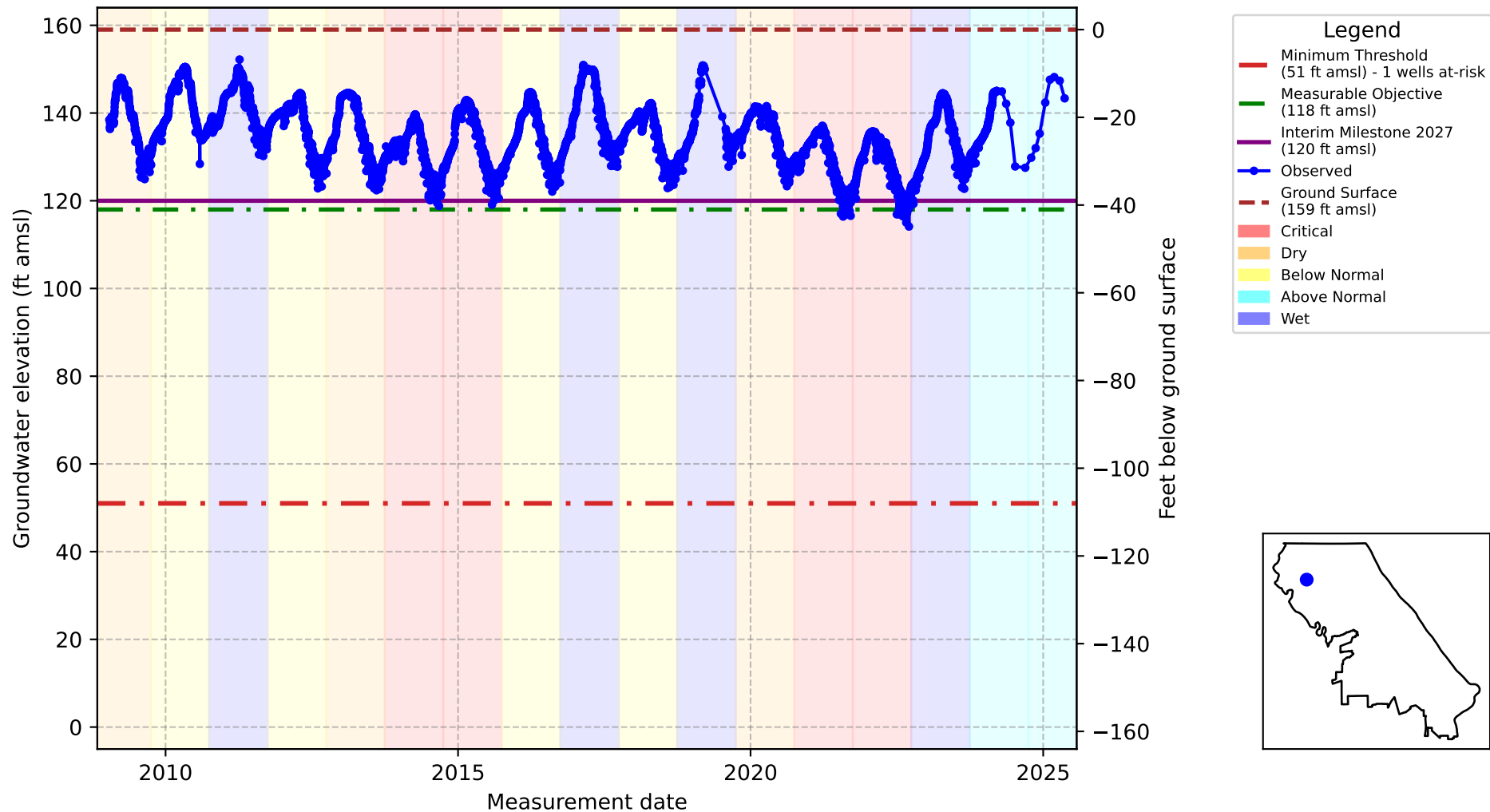
Vina Subbasin - State Well Number (SWN): 22N01W05M001M

Total Number of Domestic Wells = 1



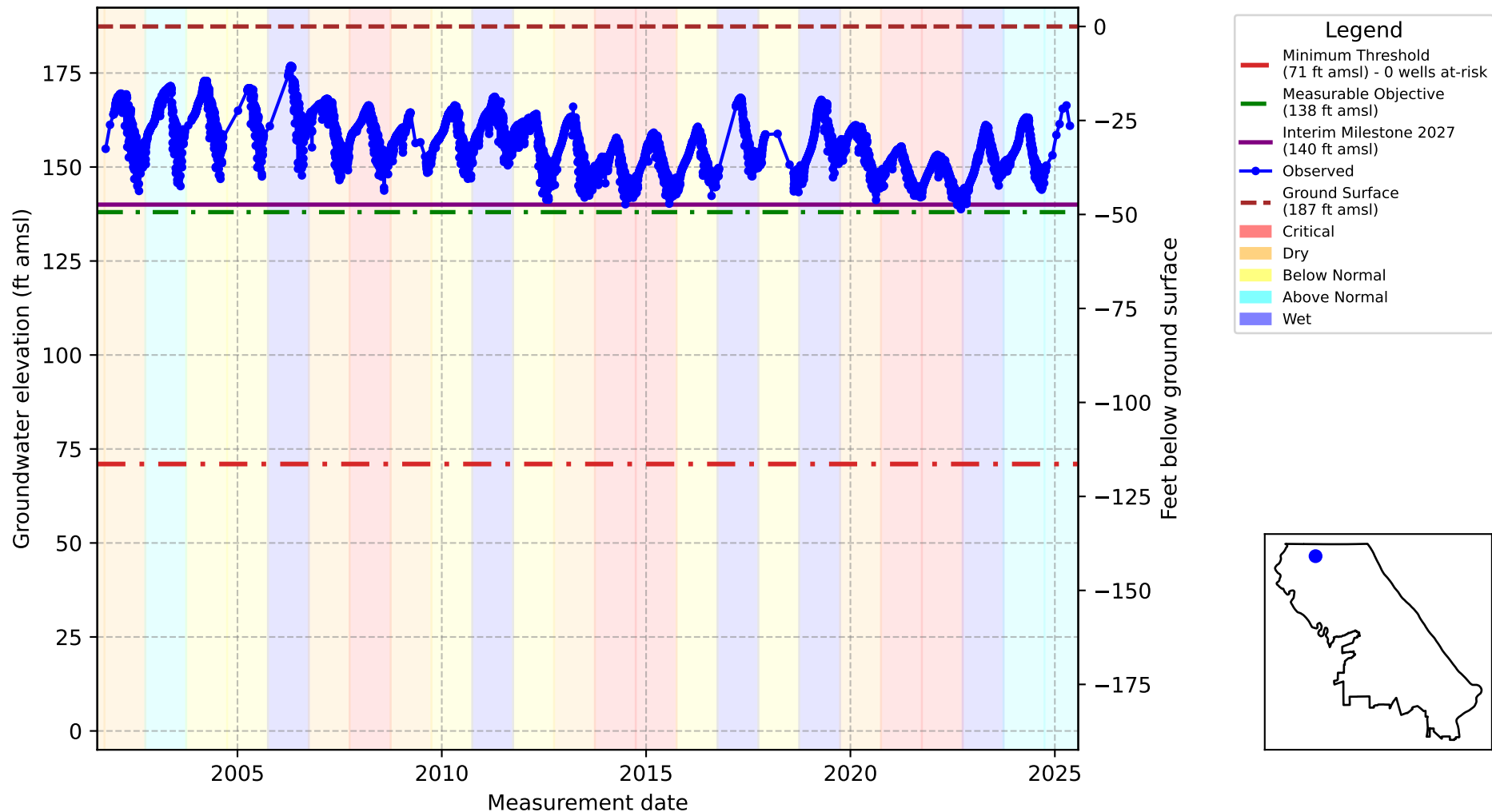
Vina Subbasin - State Well Number (SWN): 23N01W28M004M

Total Number of Domestic Wells = 6



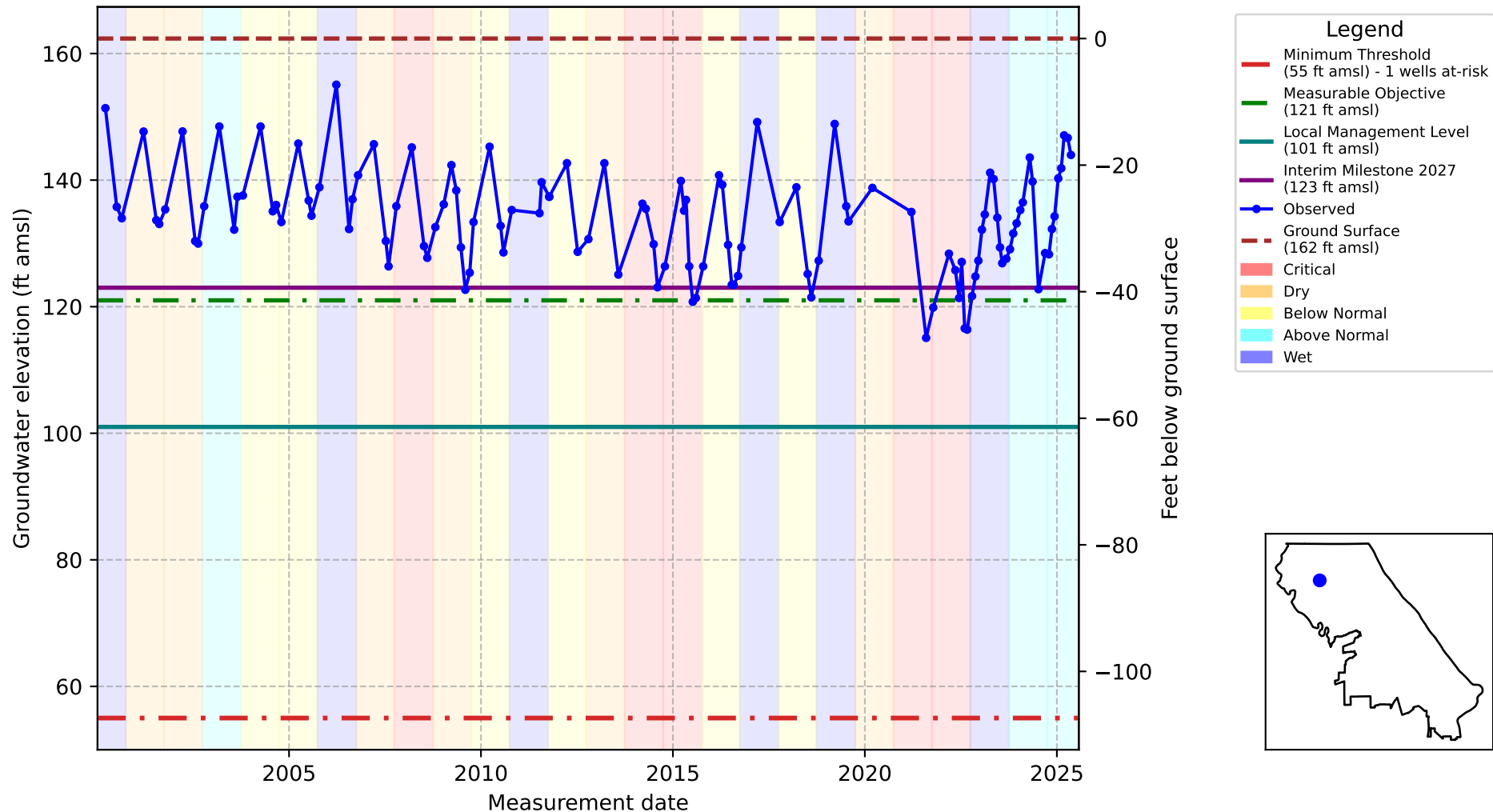
Vina Subbasin - State Well Number (SWN): 23N01W10M001M

Total Number of Domestic Wells = 7



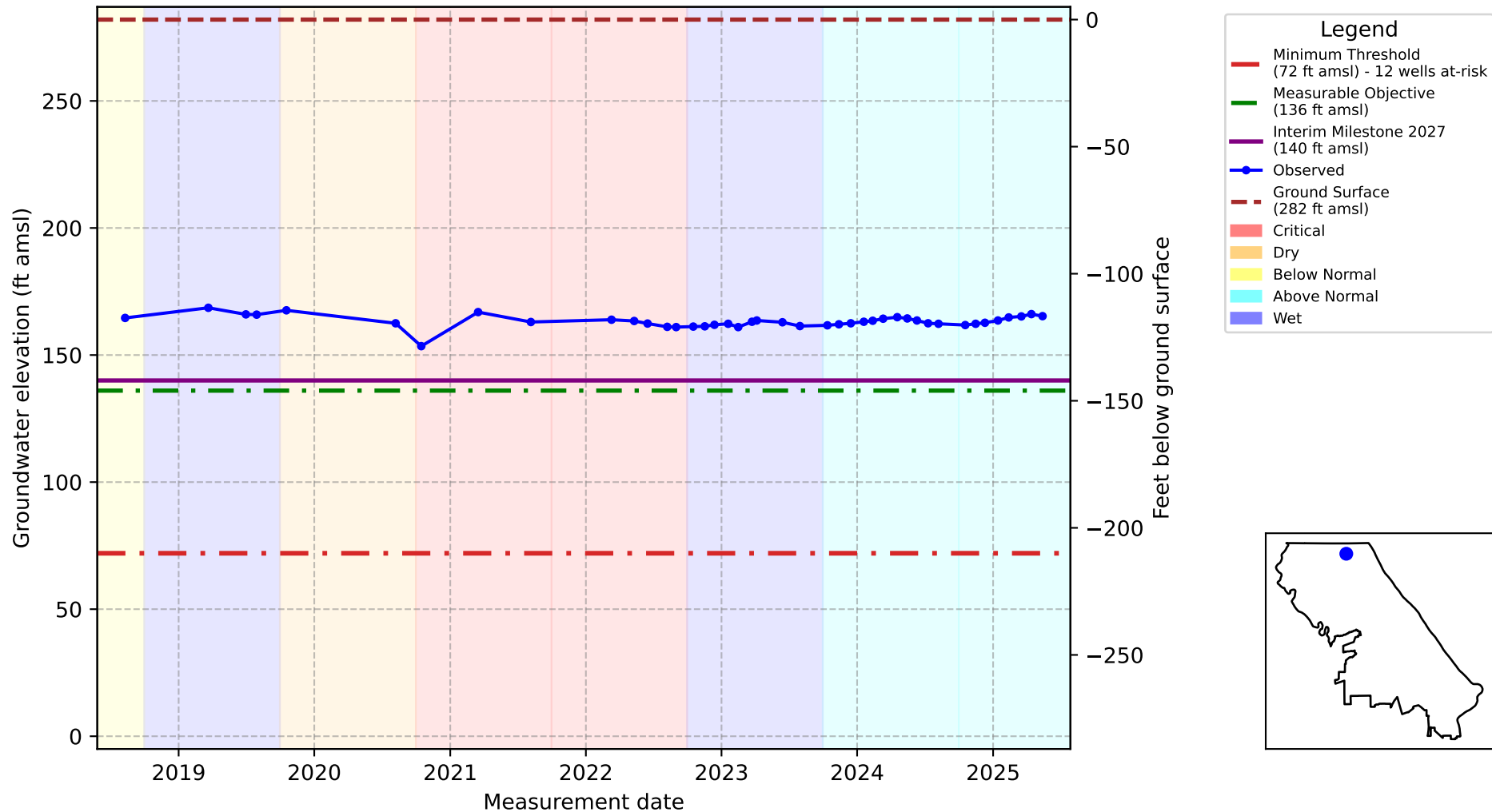
Vina Subbasin - State Well Number (SWN): 23N01W27L001M

Total Number of Domestic Wells = 15



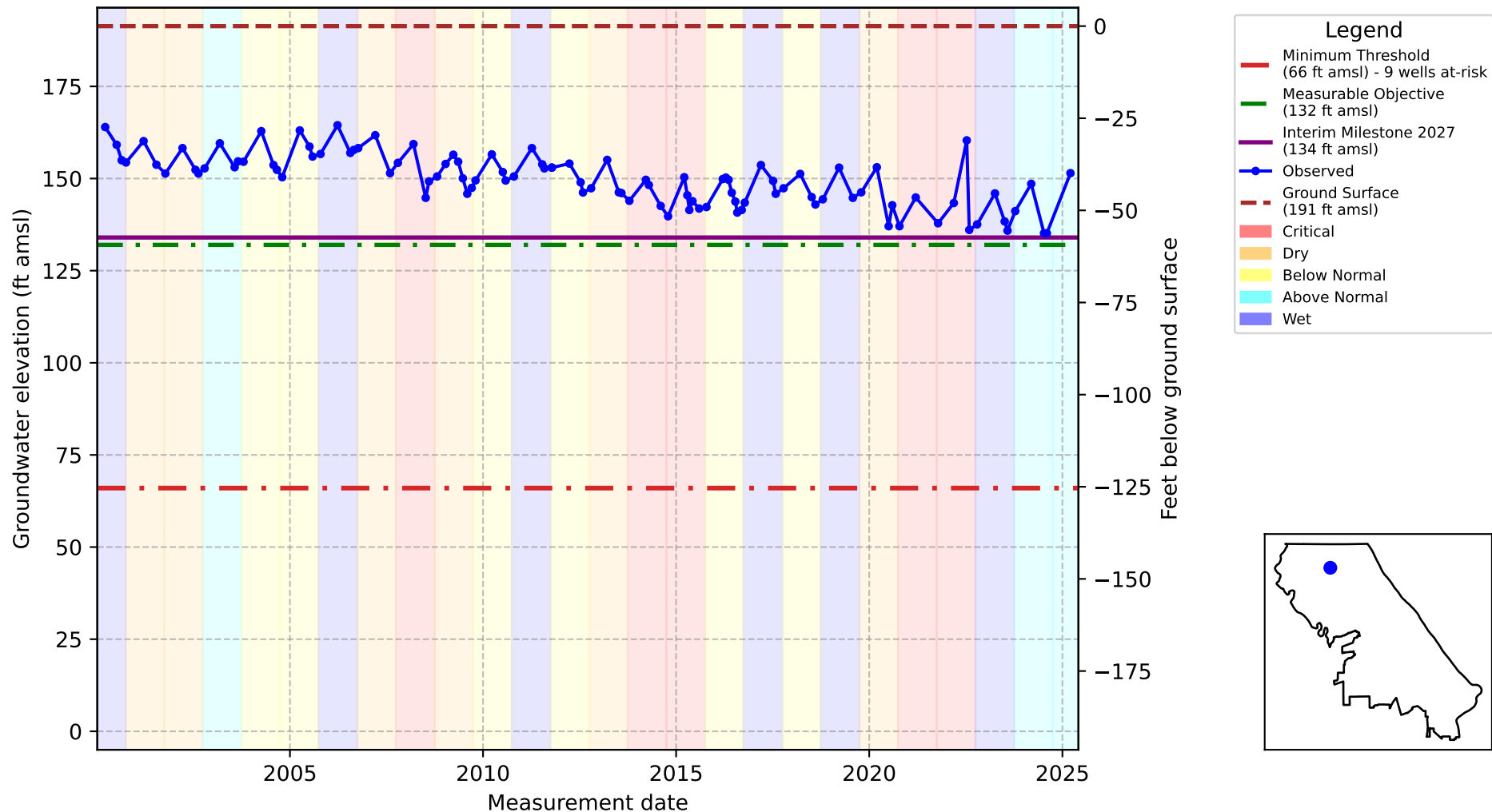
Vina Subbasin - State Well Number (SWN): 23N01E07H001M

Total Number of Domestic Wells = 32



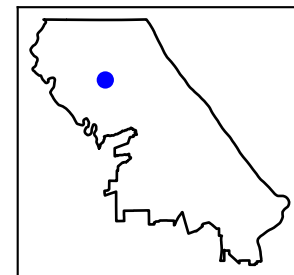
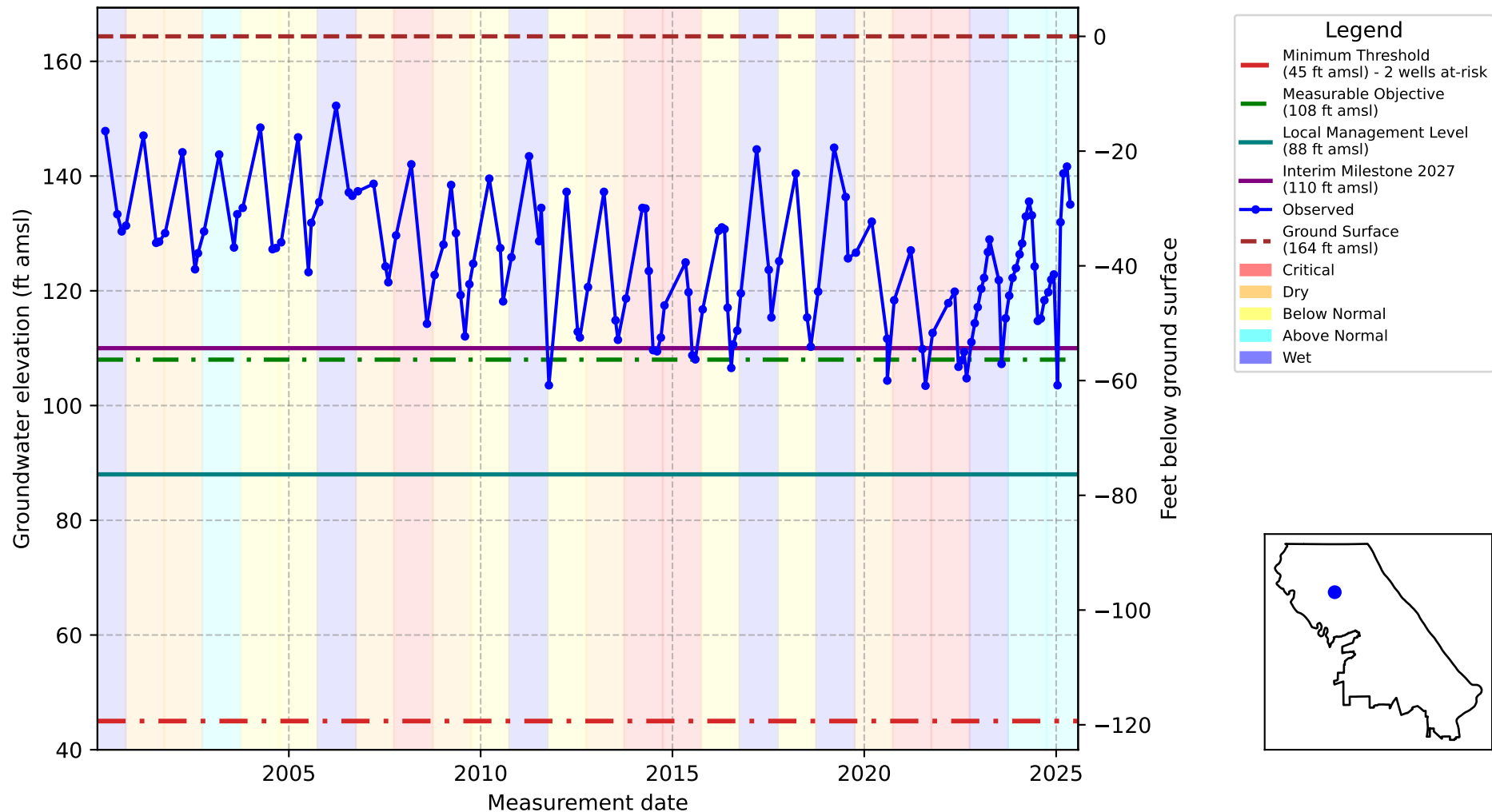
Vina Subbasin - State Well Number (SWN): 23N01W14R002M

Total Number of Domestic Wells = 30



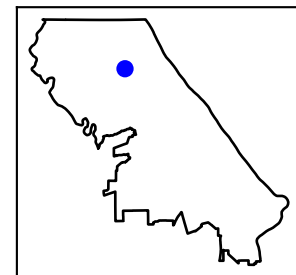
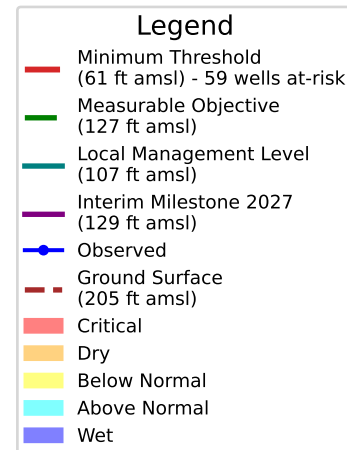
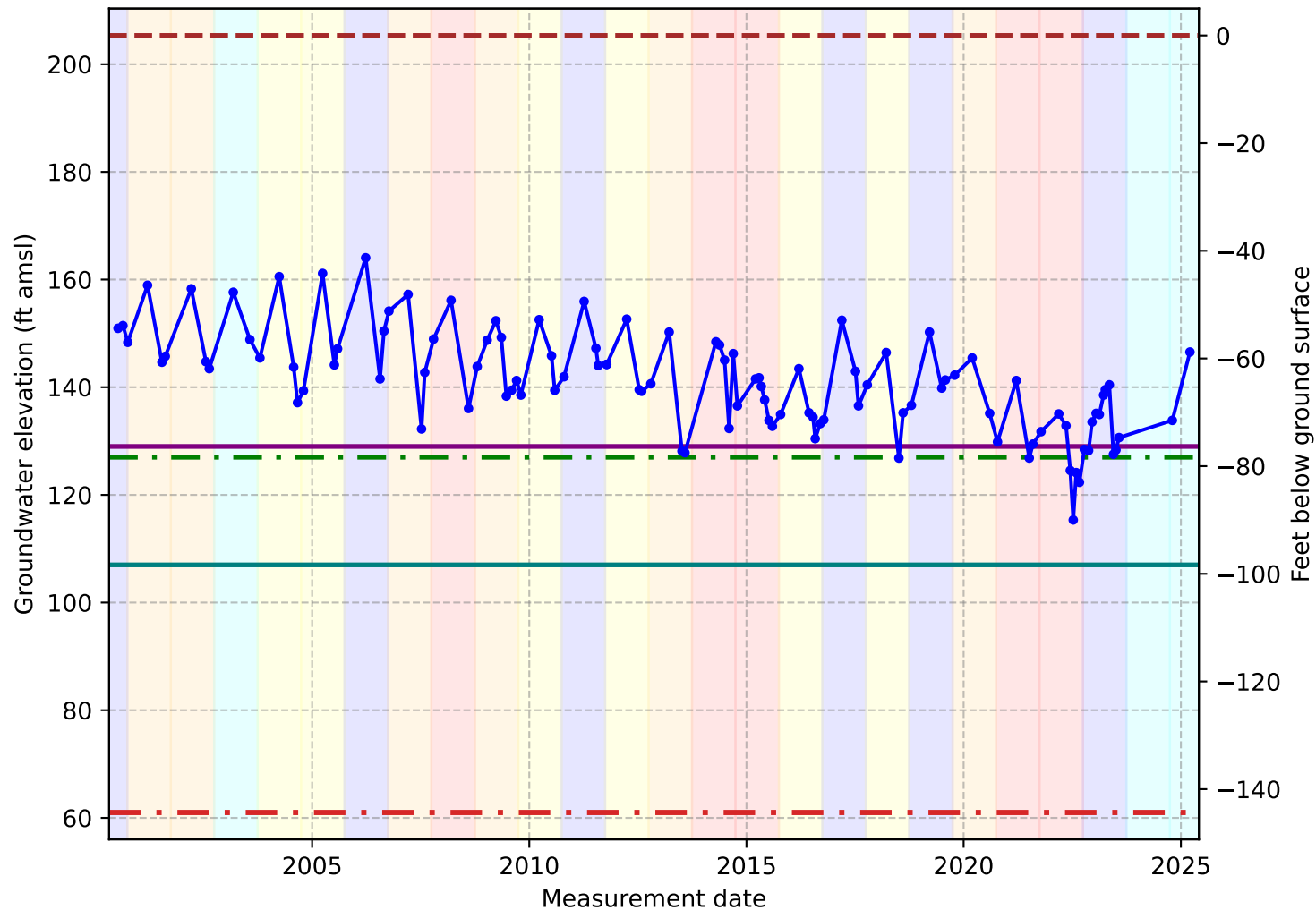
Vina Subbasin - State Well Number (SWN): 23N01W36P001M

Total Number of Domestic Wells = 53



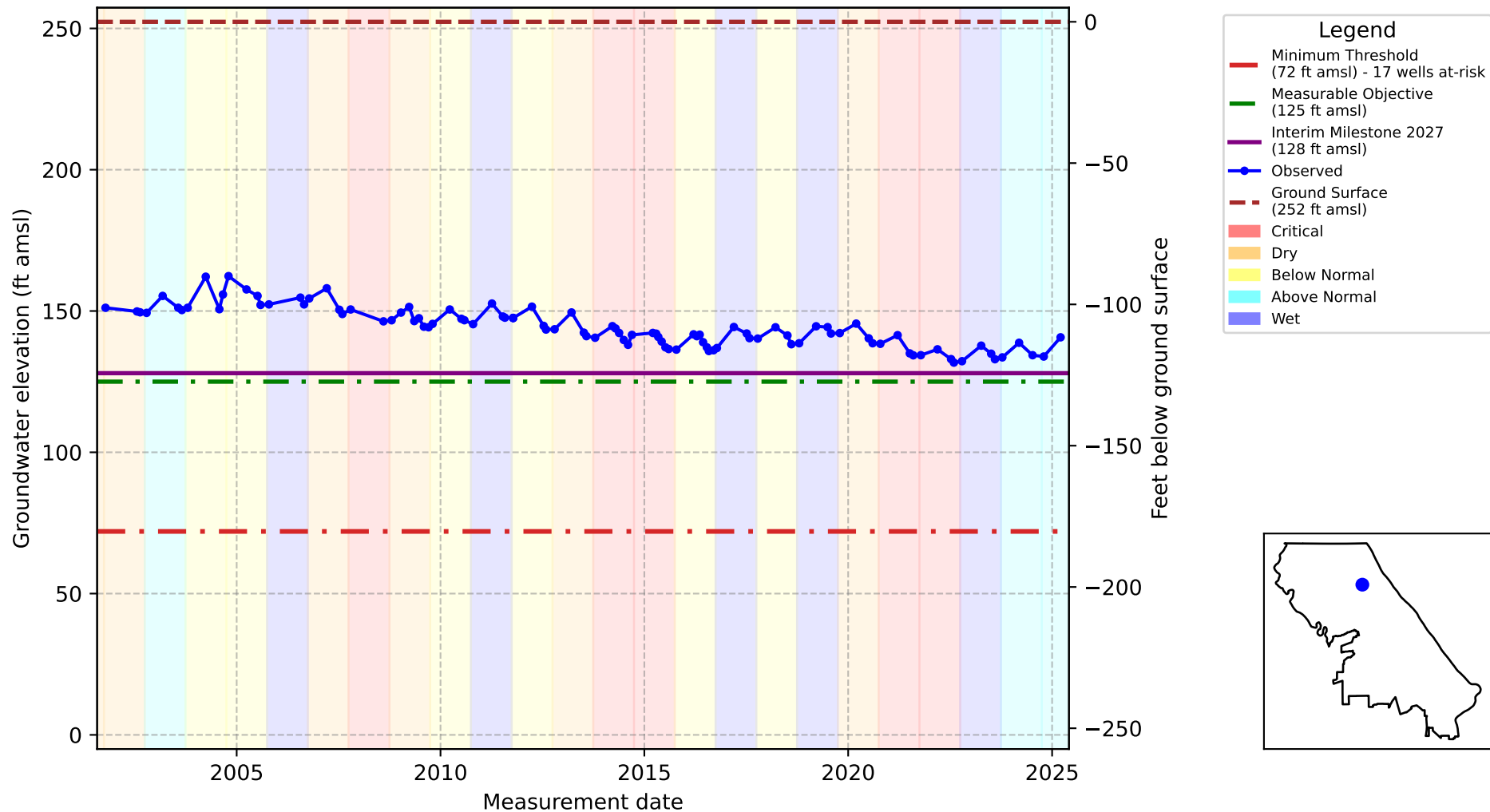
Vina Subbasin - State Well Number (SWN): 23N01E29P002M

Total Number of Domestic Wells = 239



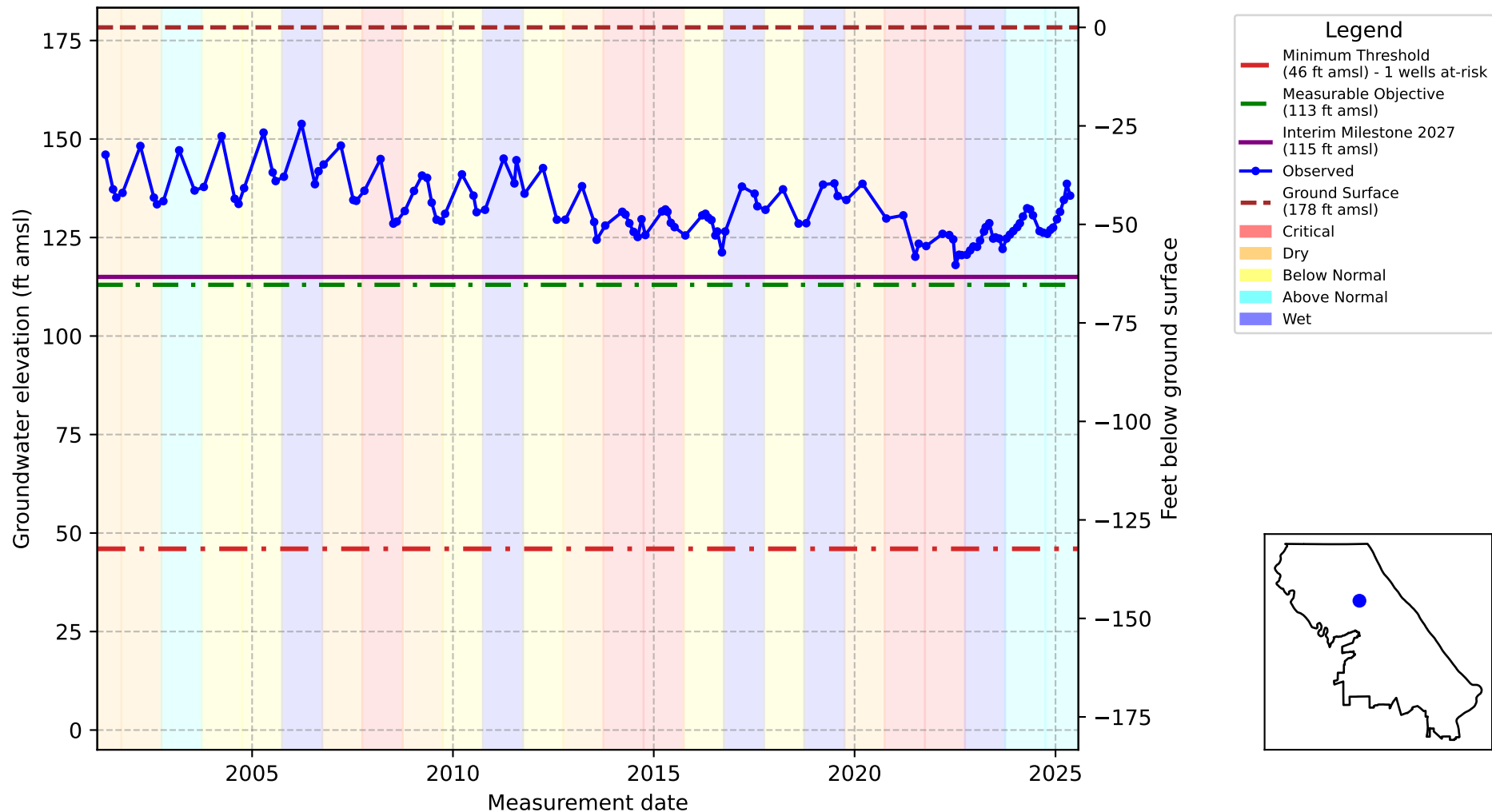
Vina Subbasin - State Well Number (SWN): 23N01E33A001M

Total Number of Domestic Wells = 88



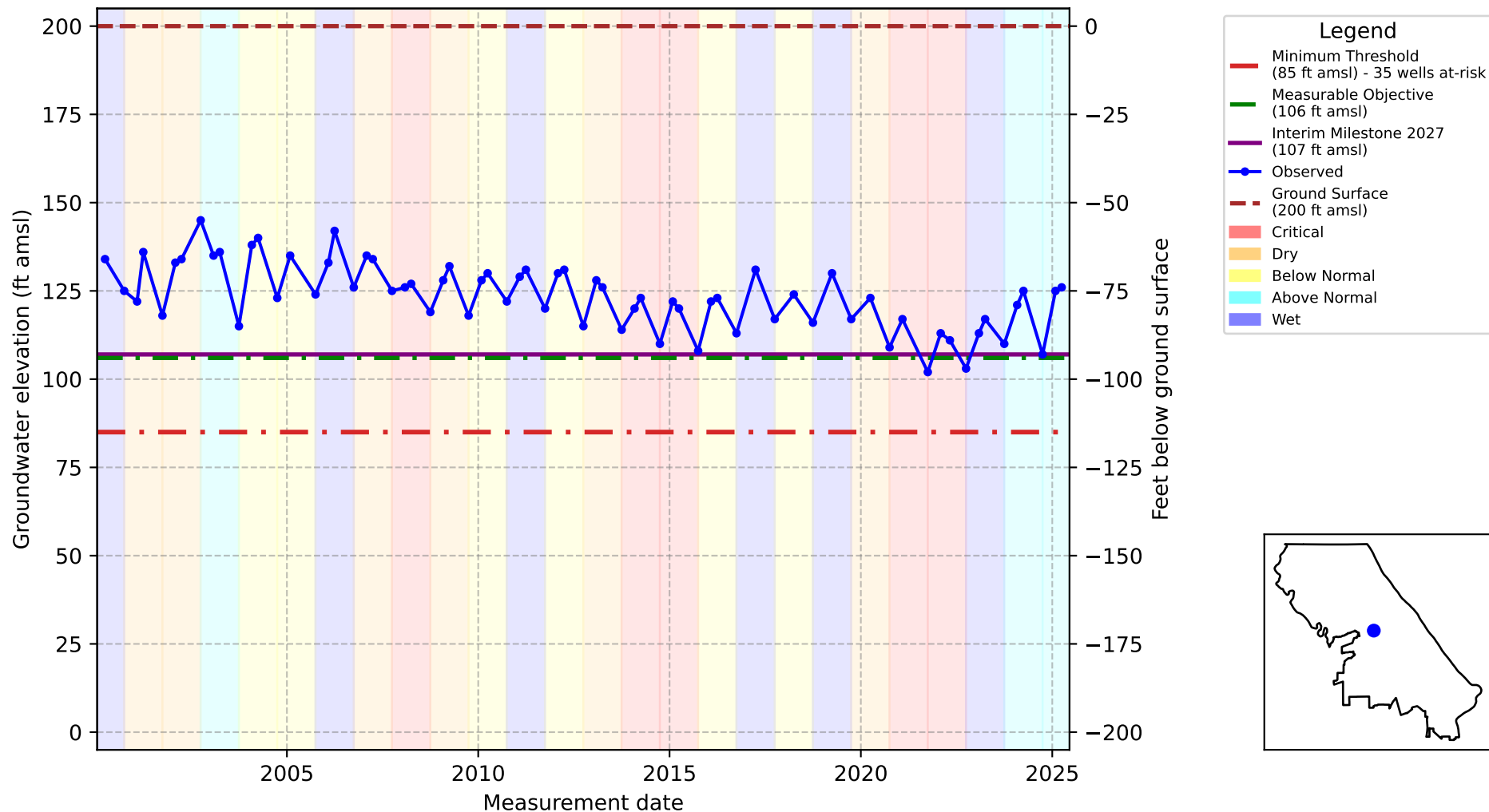
Vina Subbasin - State Well Number (SWN): 22N01E09B001M

Total Number of Domestic Wells = 12



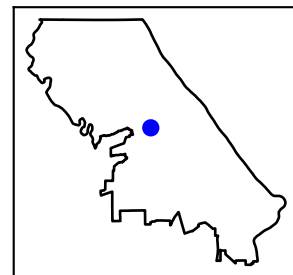
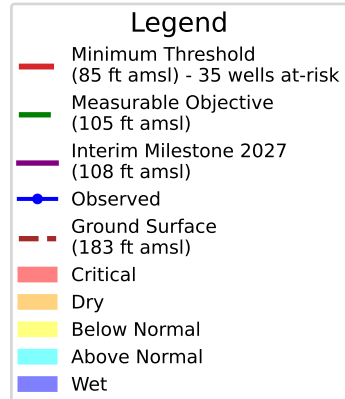
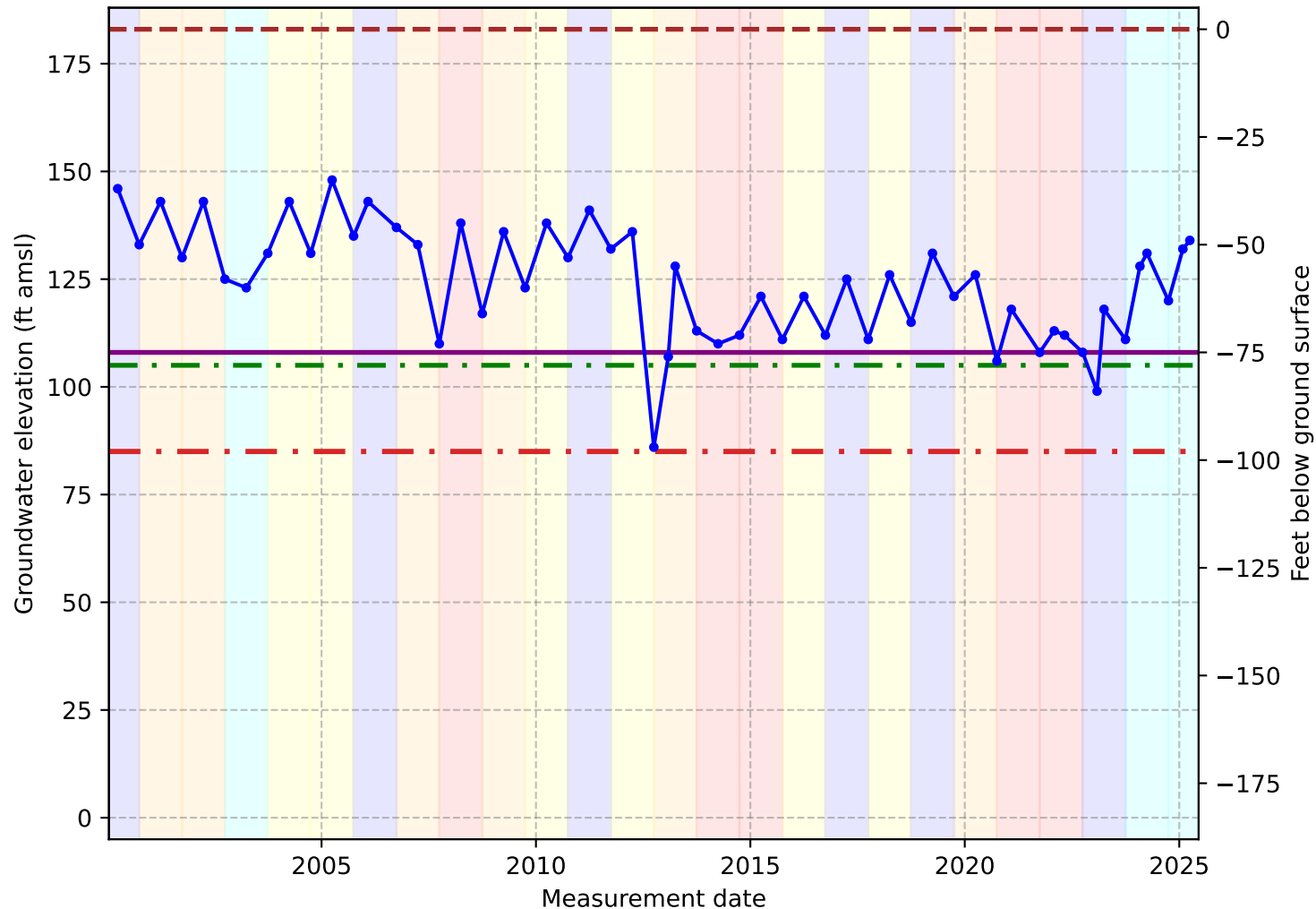
Vina Subbasin - State Well Number (SWN): PWSCH01b

Total Number of Domestic Wells = 387



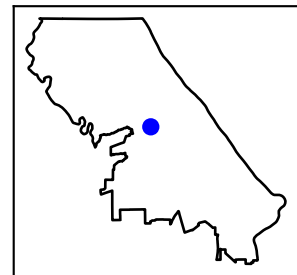
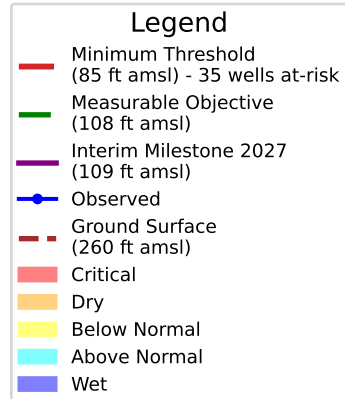
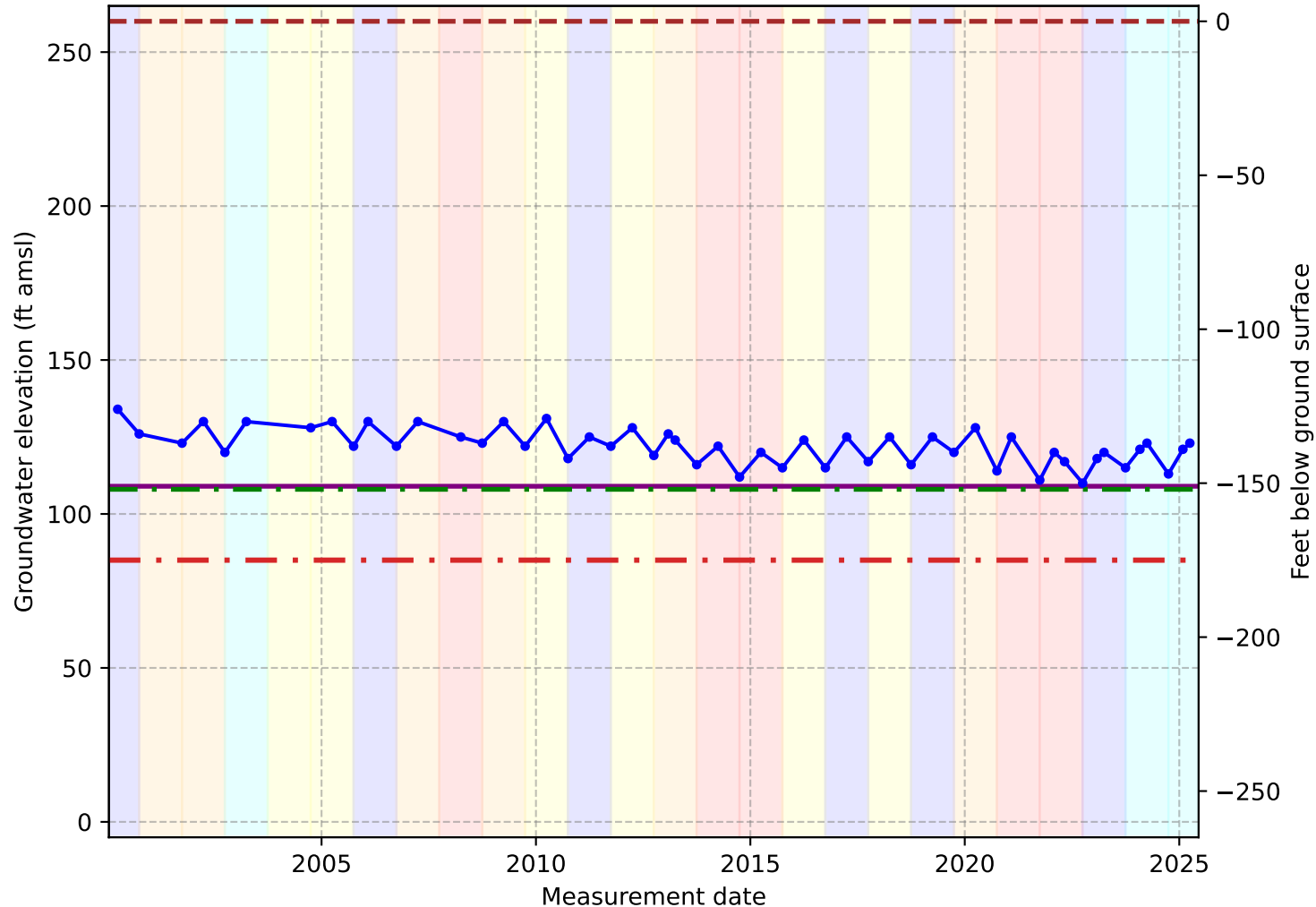
Vina Subbasin - State Well Number (SWN): PWSCH02

Total Number of Domestic Wells = 387



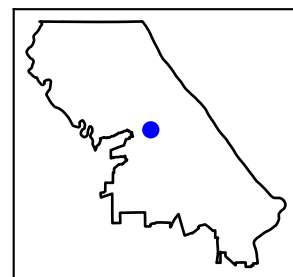
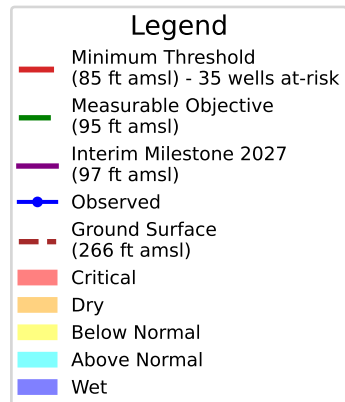
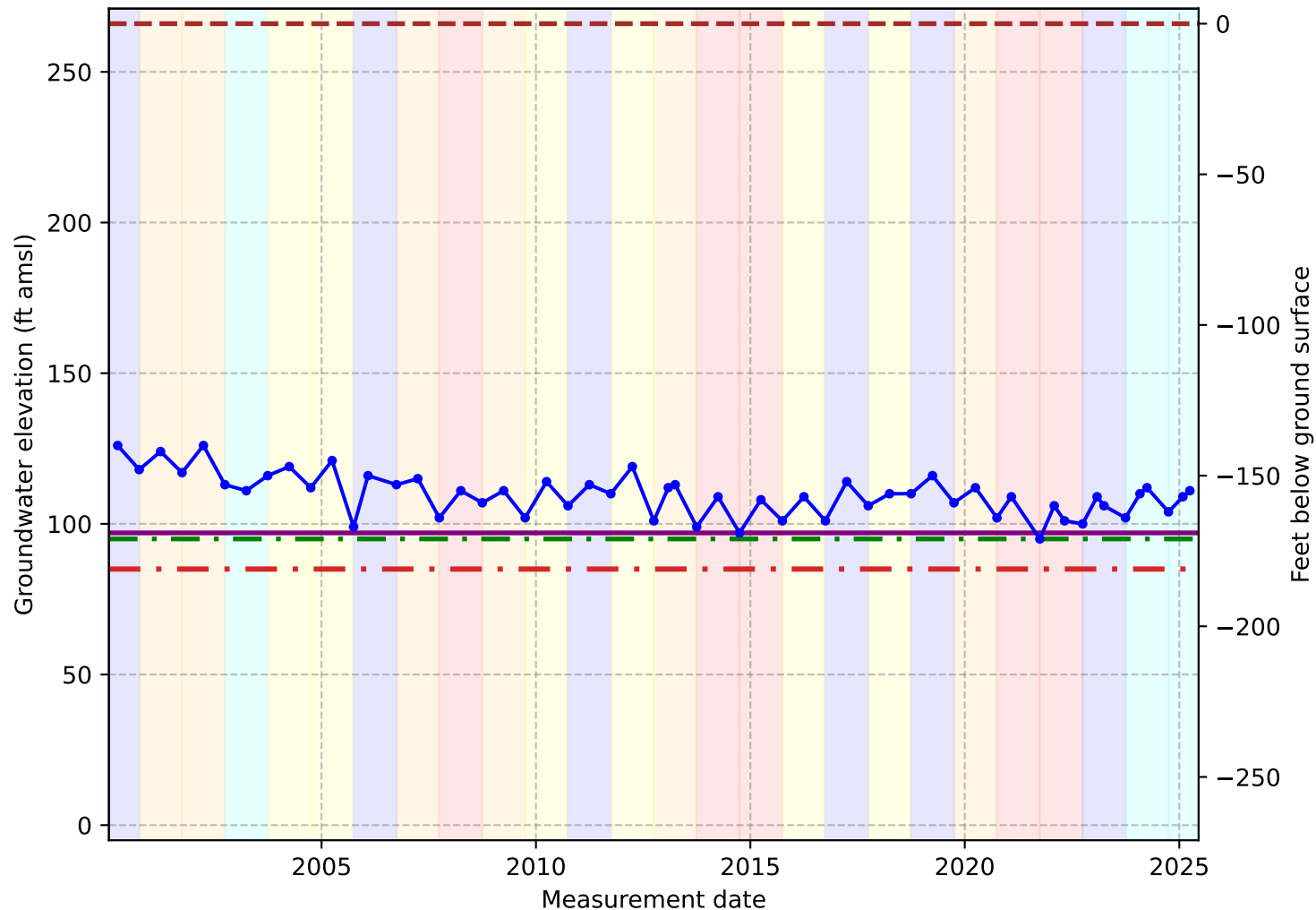
Vina Subbasin - State Well Number (SWN): PWSCH03

Total Number of Domestic Wells = 387



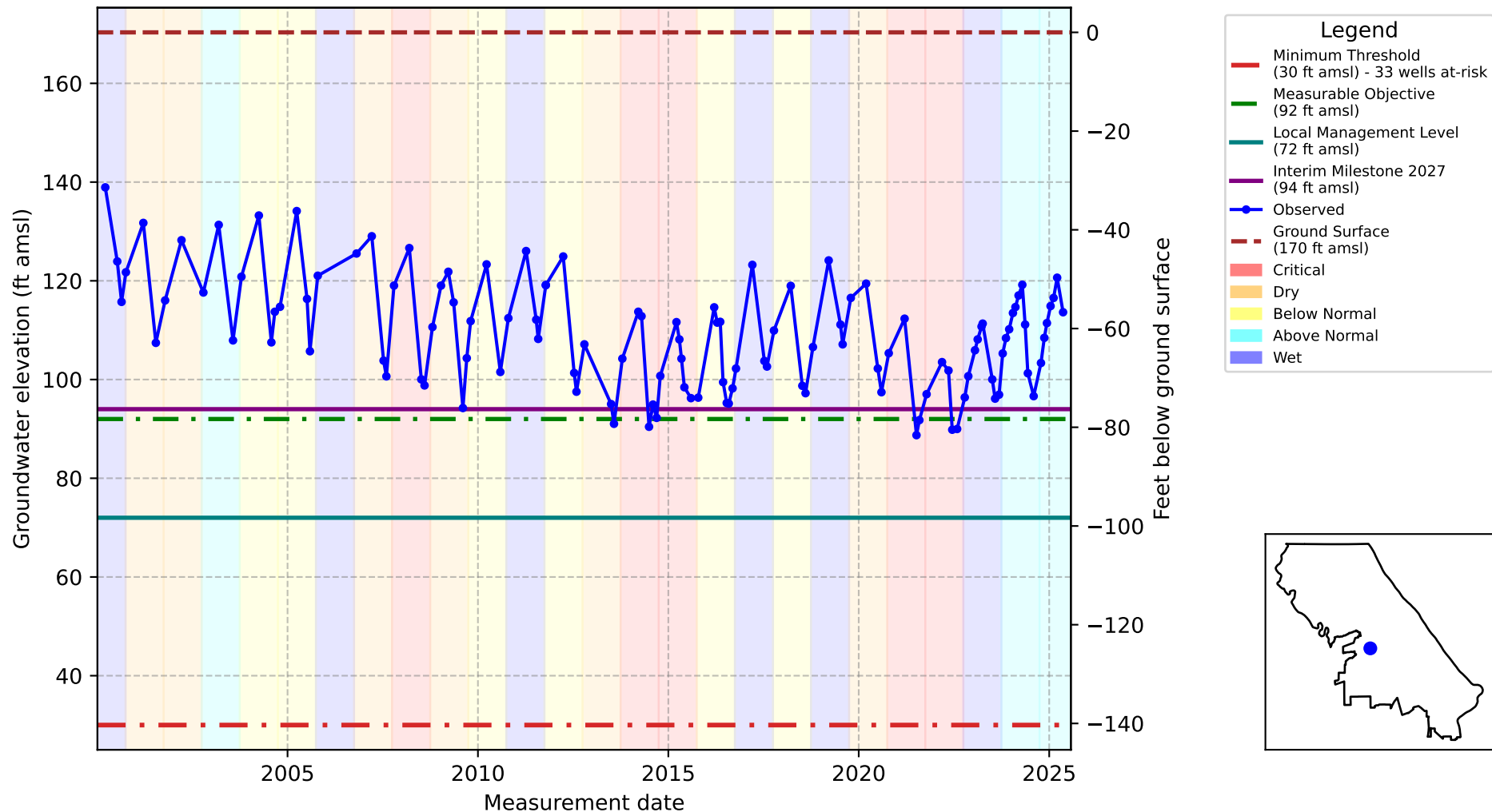
Vina Subbasin - State Well Number (SWN): PWSCH07

Total Number of Domestic Wells = 387



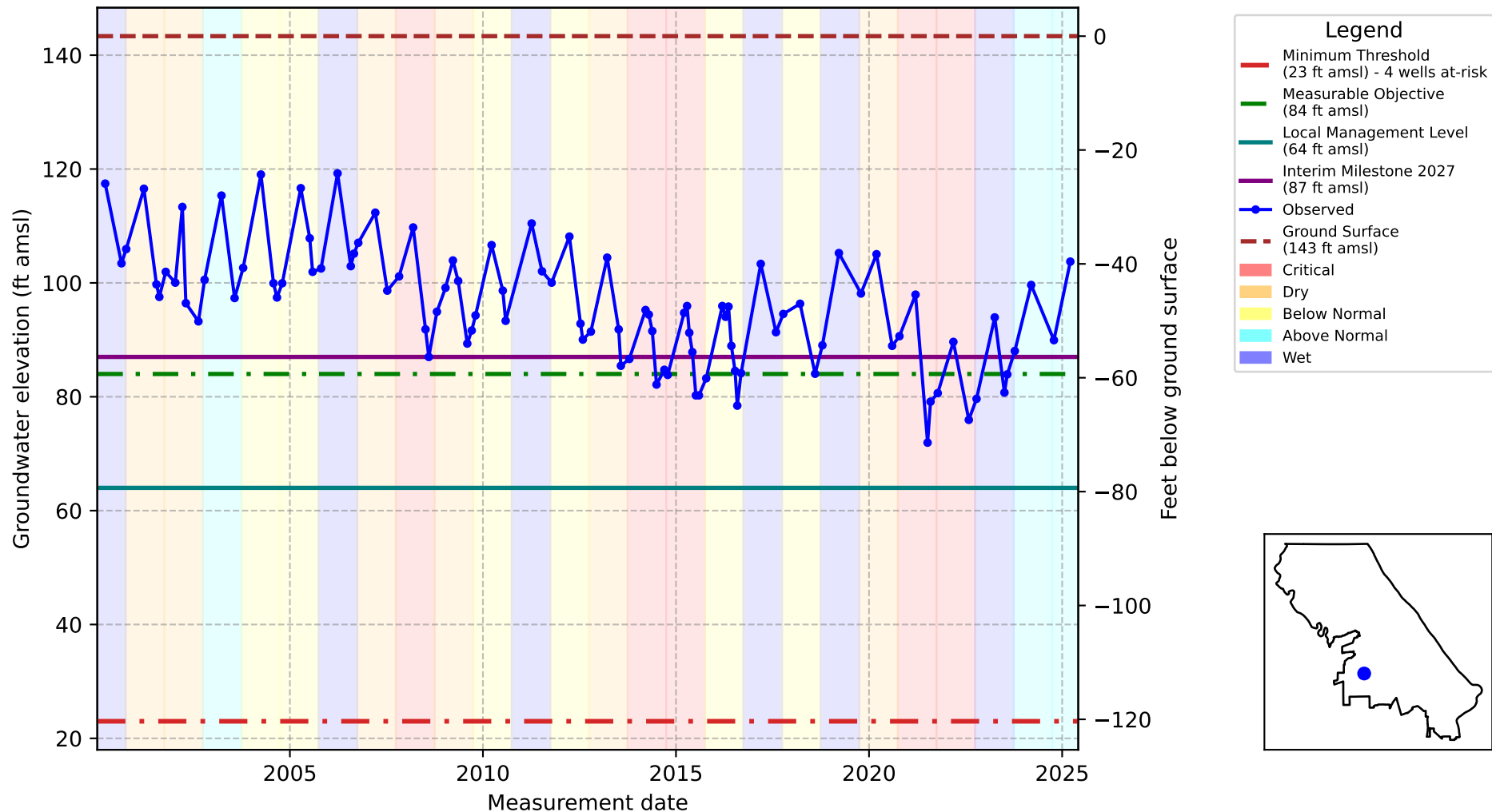
Vina Subbasin - State Well Number (SWN): 21N01E10B003M

Total Number of Domestic Wells = 105



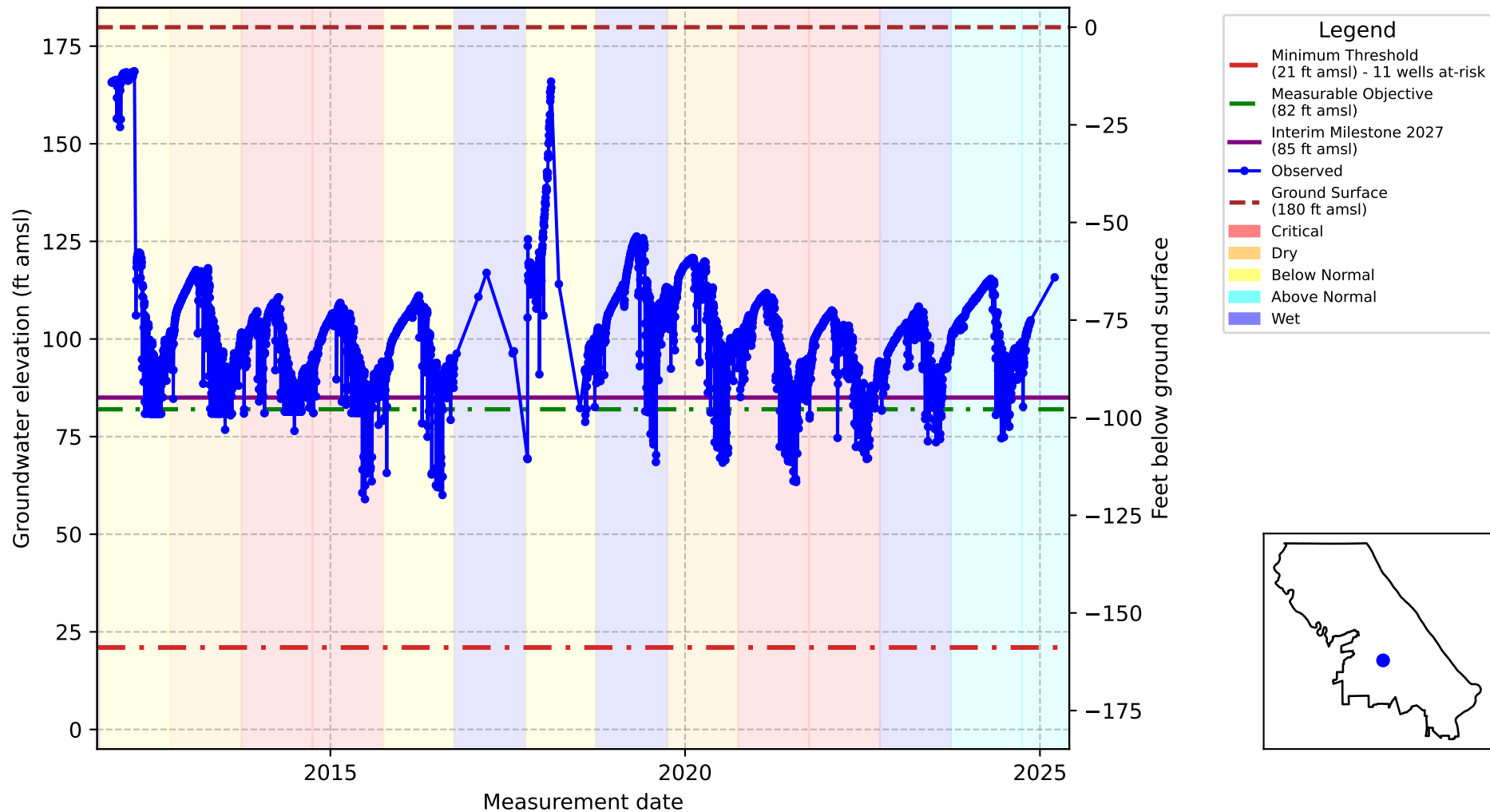
Vina Subbasin - State Well Number (SWN): 21N01E27D001M

Total Number of Domestic Wells = 61



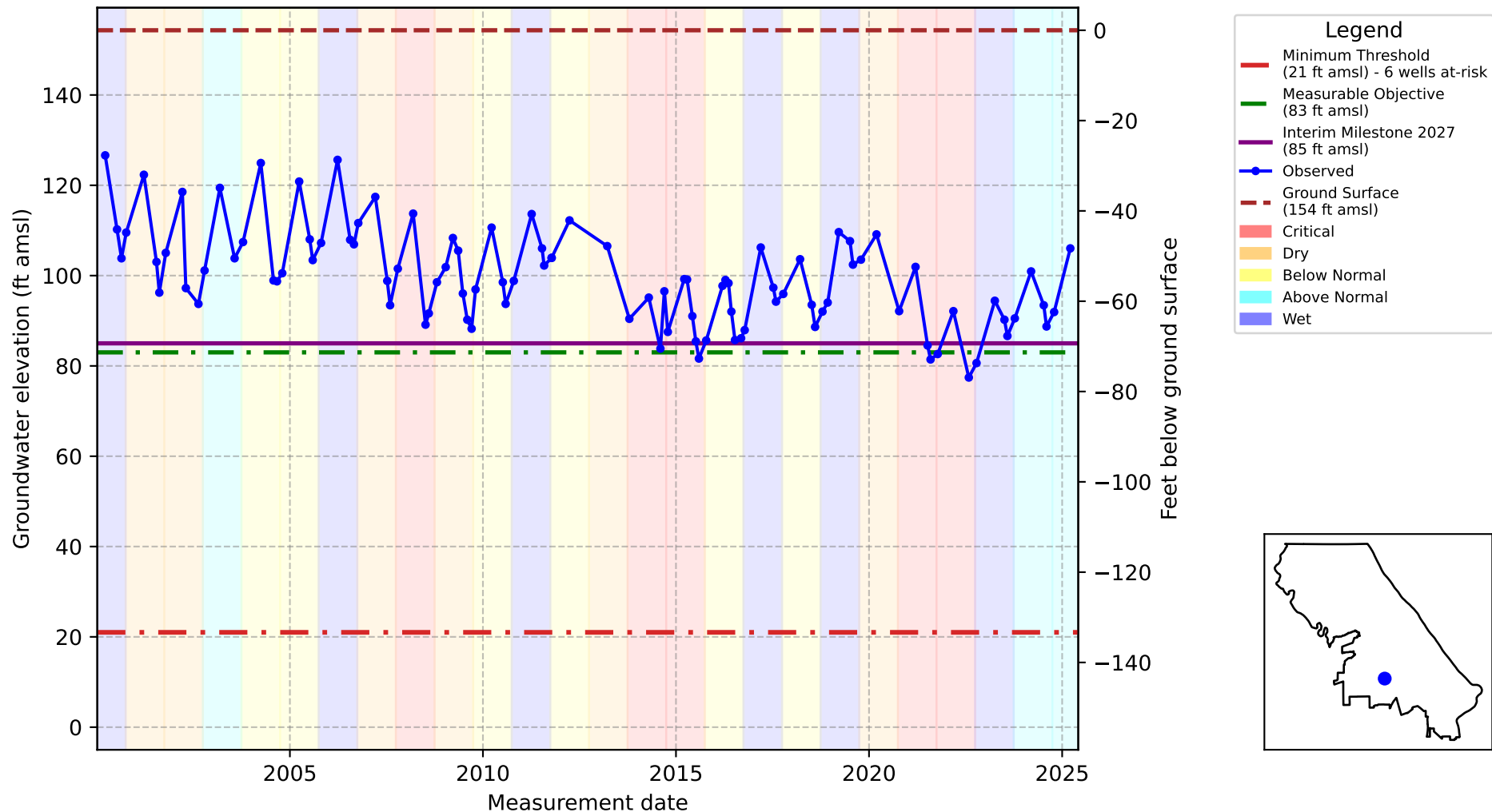
Vina Subbasin - State Well Number (SWN): 21N01E13L004M

Total Number of Domestic Wells = 28



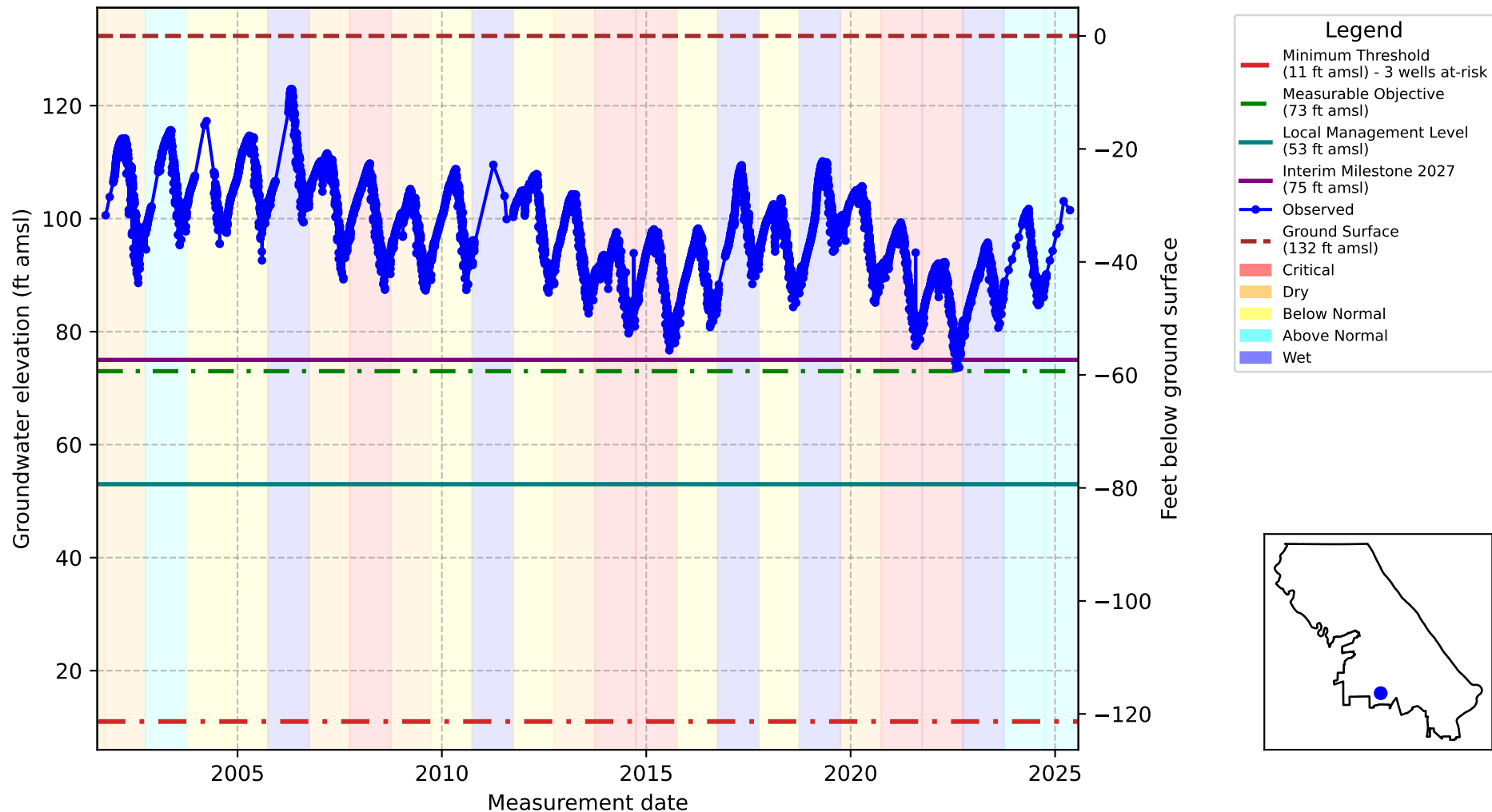
Vina Subbasin - State Well Number (SWN): 21N01E25K001M

Total Number of Domestic Wells = 27



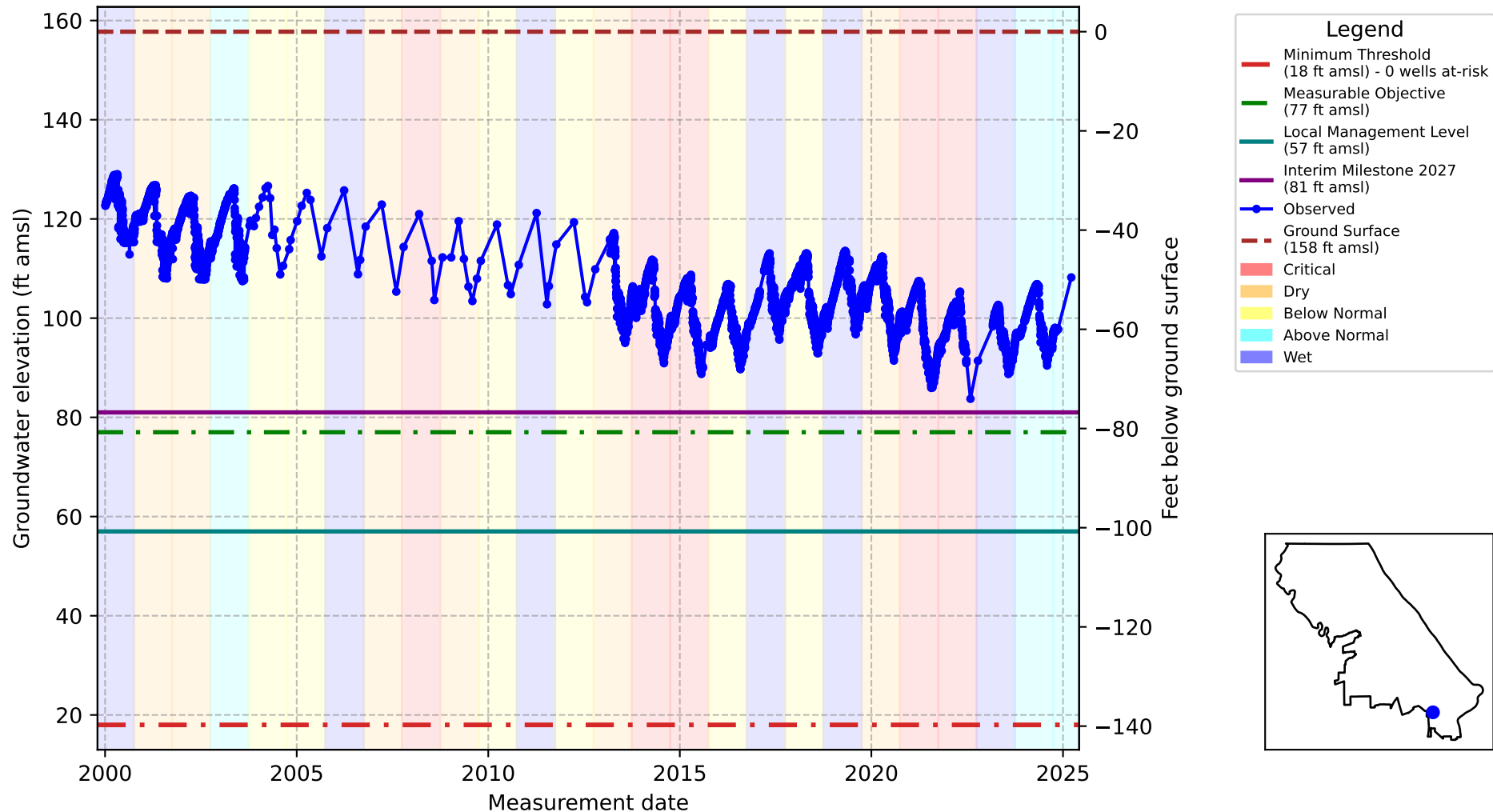
Vina Subbasin - State Well Number (SWN): 20N01E02H003M

Total Number of Domestic Wells = 15



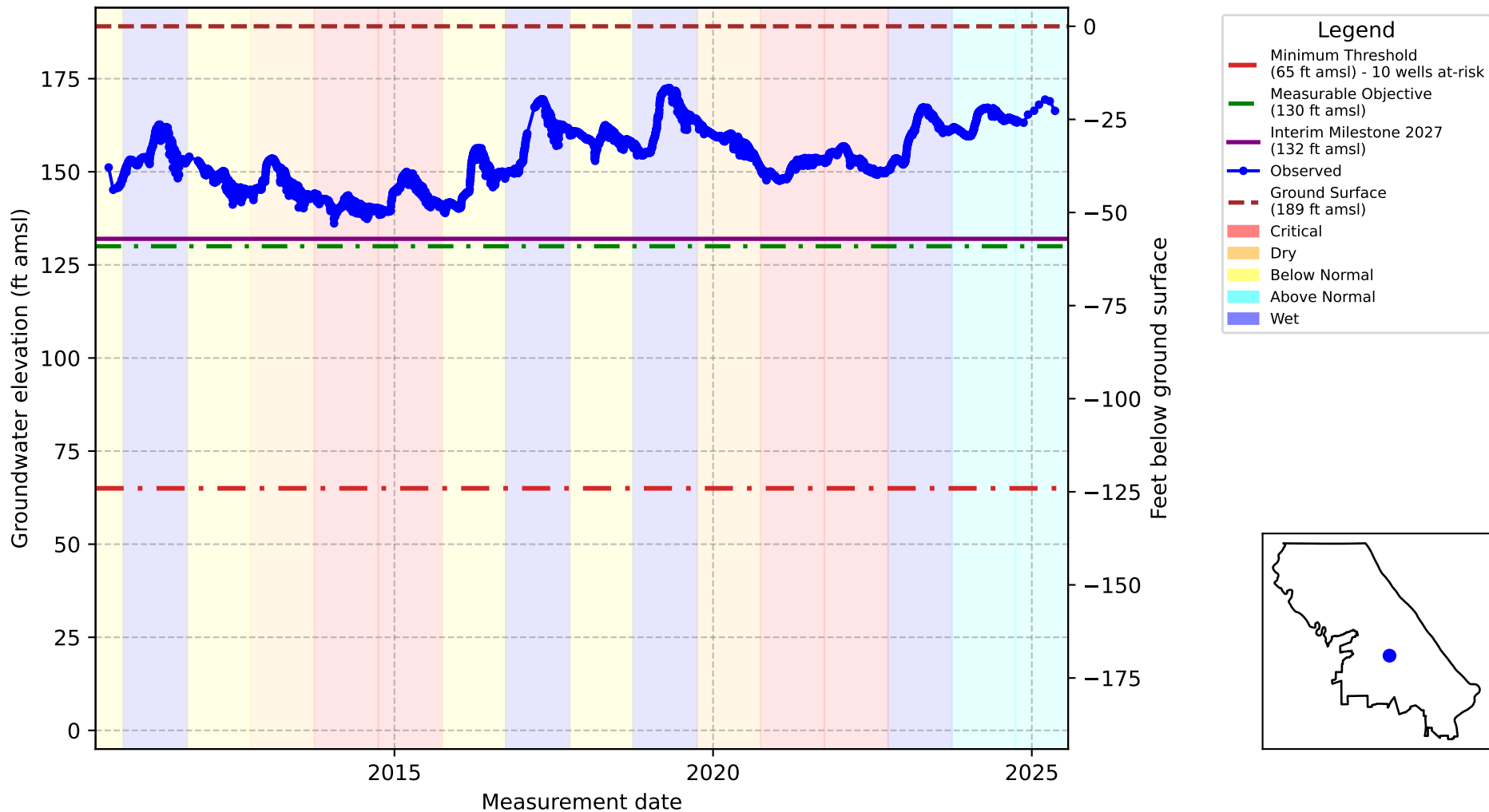
Vina Subbasin - State Well Number (SWN): 20N02E24C001M

Total Number of Domestic Wells = 7



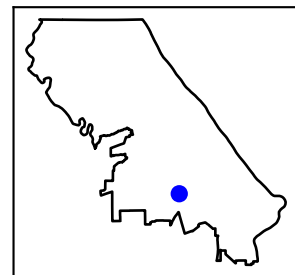
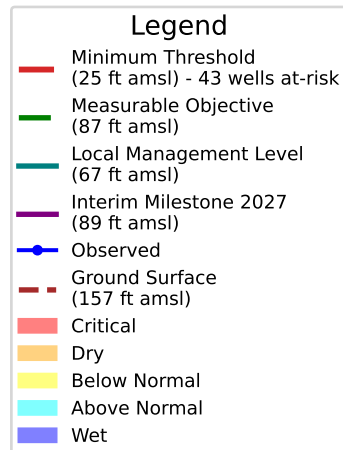
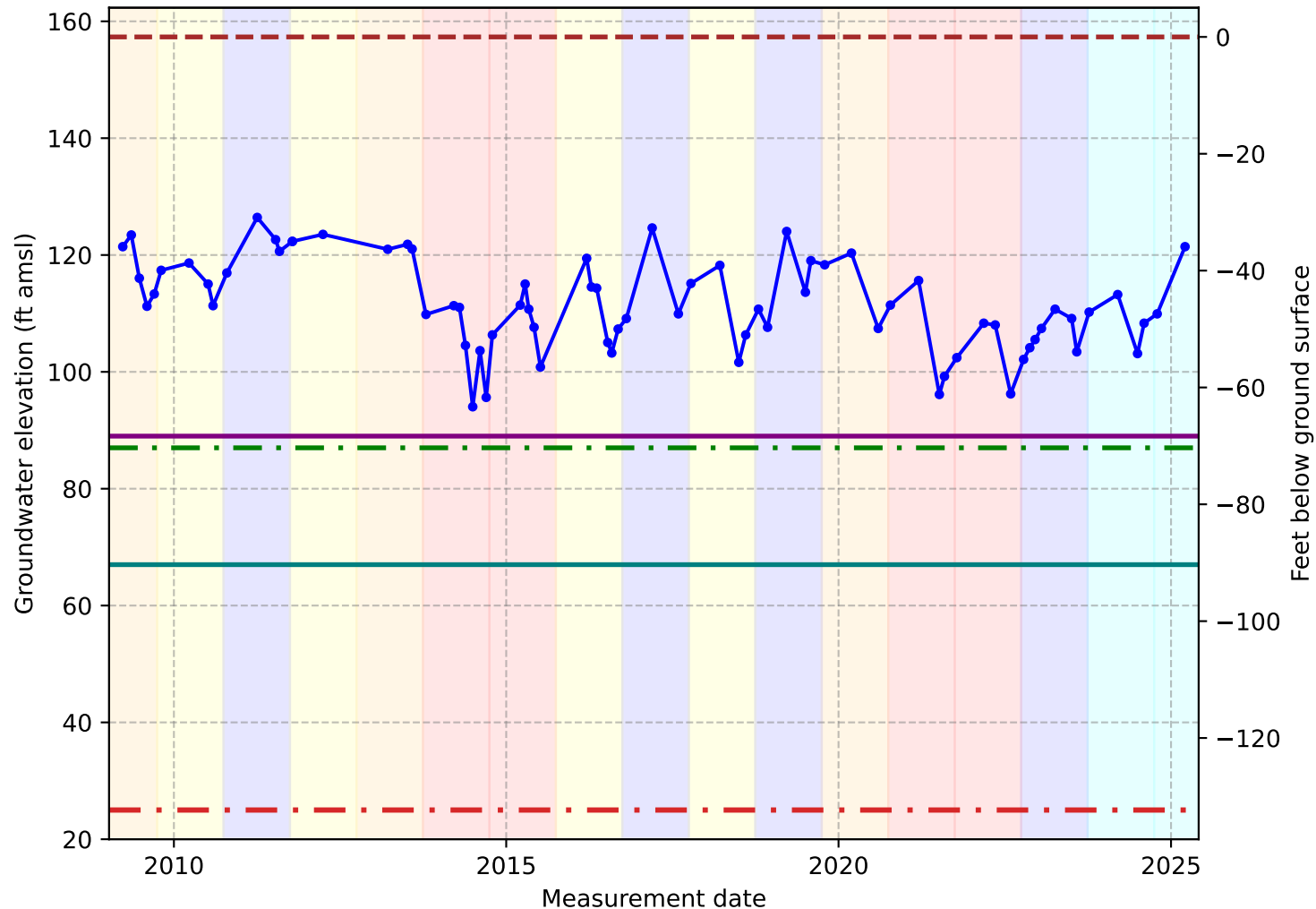
Vina Subbasin - State Well Number (SWN): 21N02E18C003M

Total Number of Domestic Wells = 92



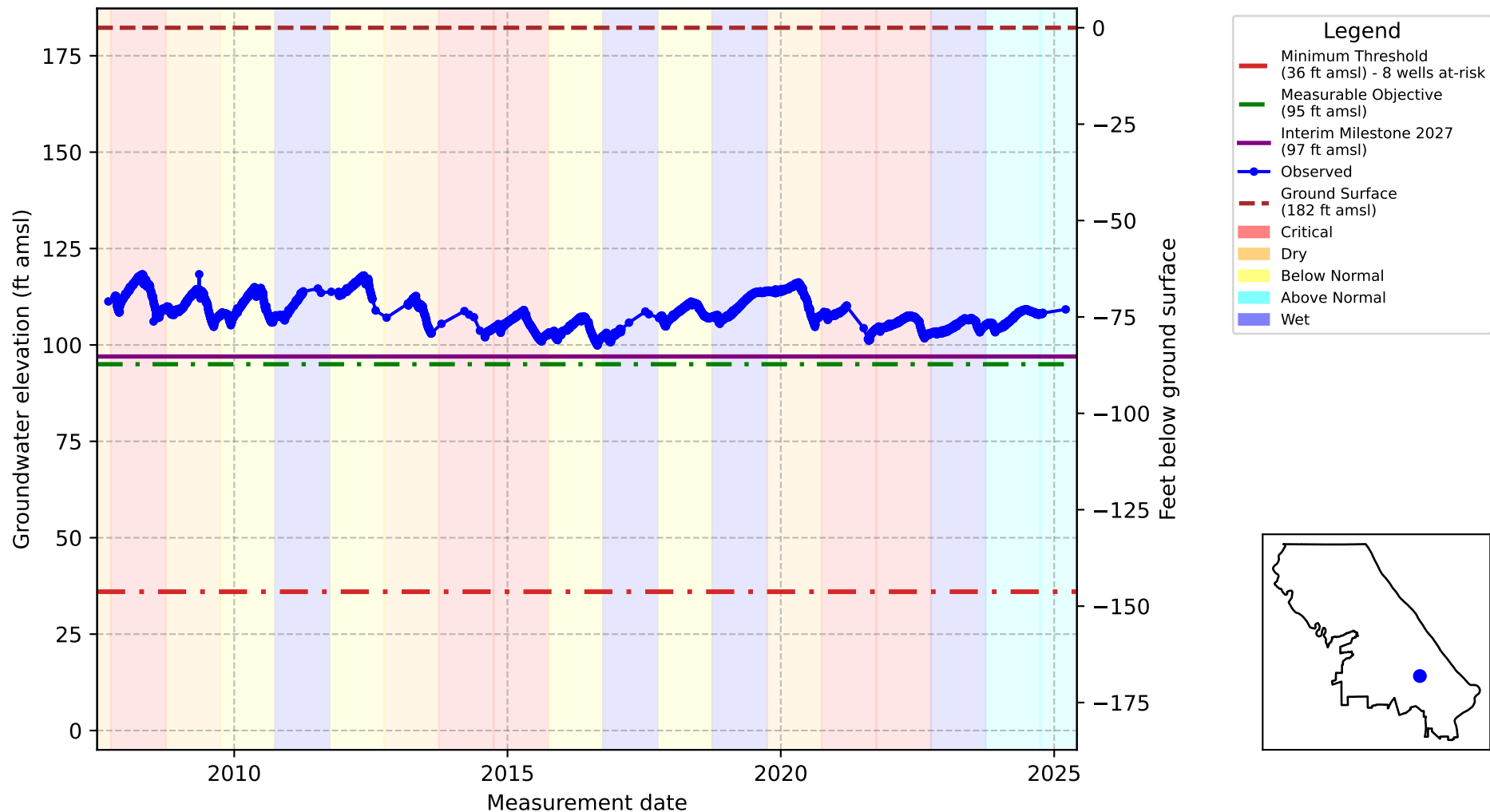
Vina Subbasin - State Well Number (SWN): 21N02E32E001M

Total Number of Domestic Wells = 110



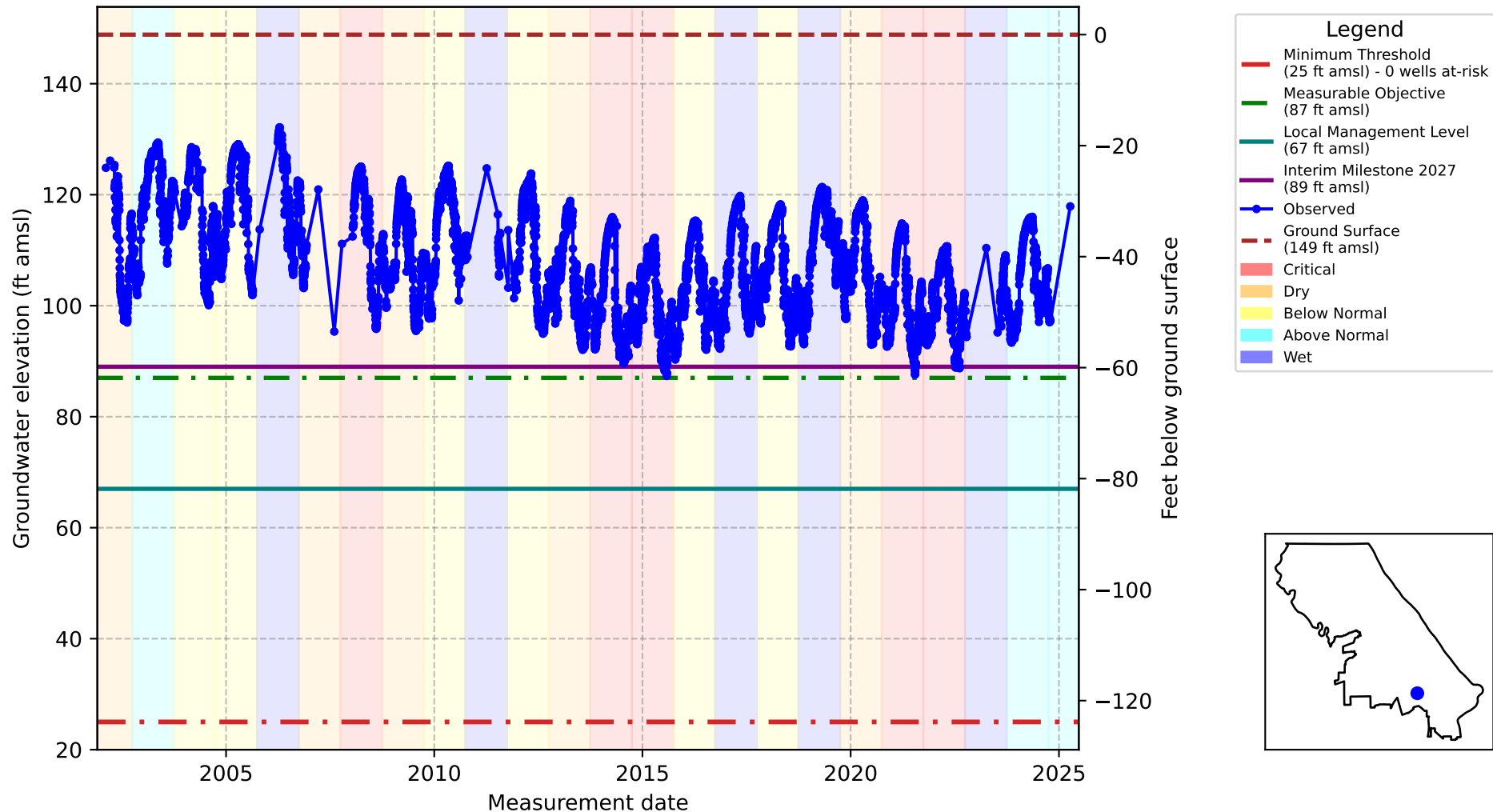
Vina Subbasin - State Well Number (SWN): 21N02E26E006M

Total Number of Domestic Wells = 20



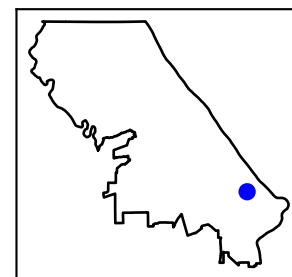
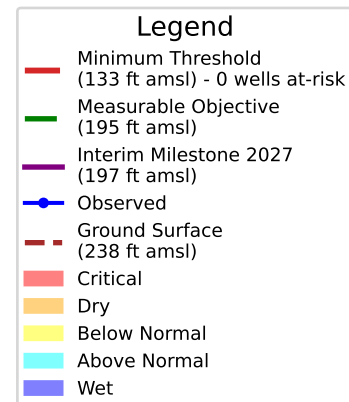
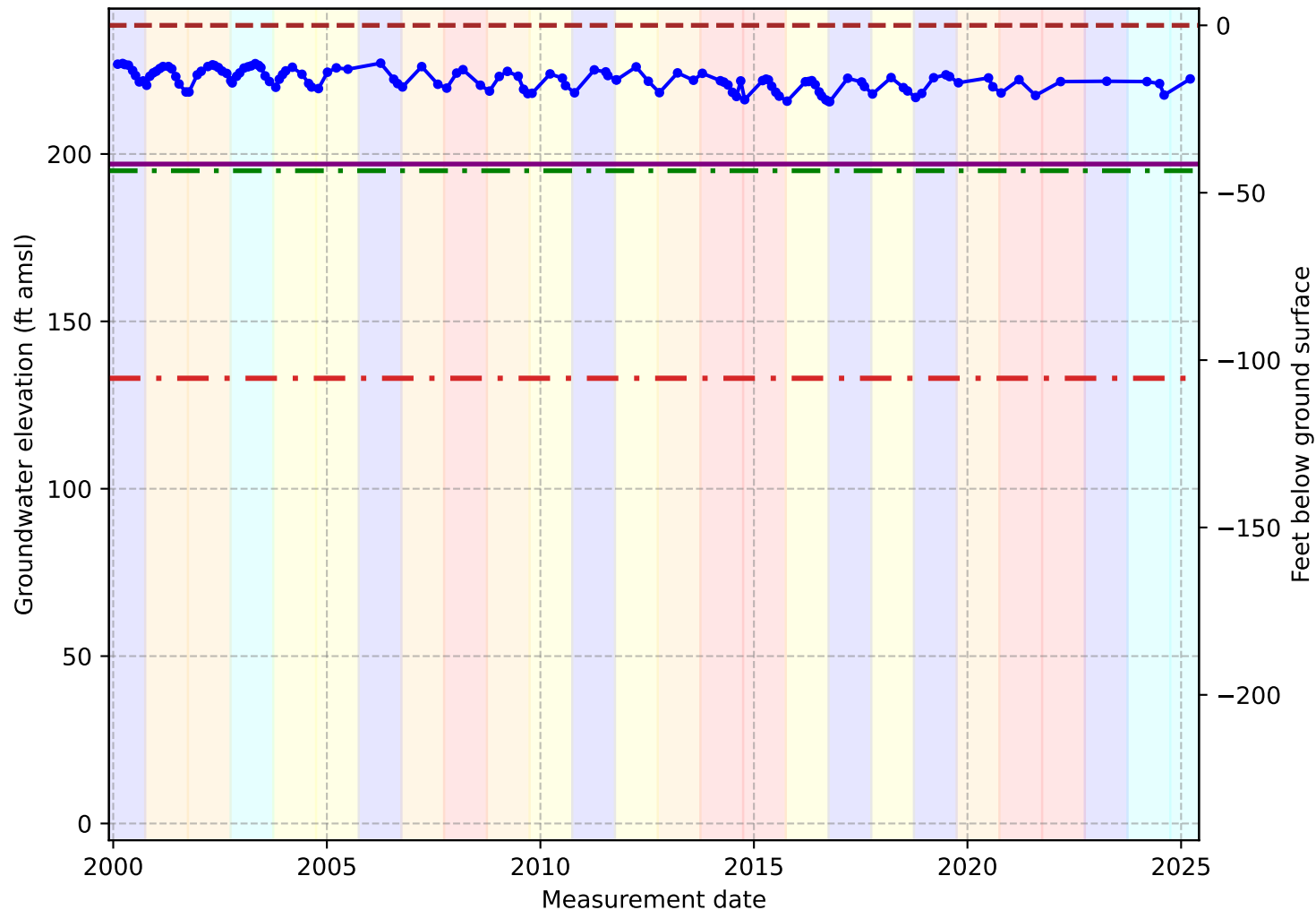
Vina Subbasin - State Well Number (SWN): 20N02E09G001M

Total Number of Domestic Wells = 2



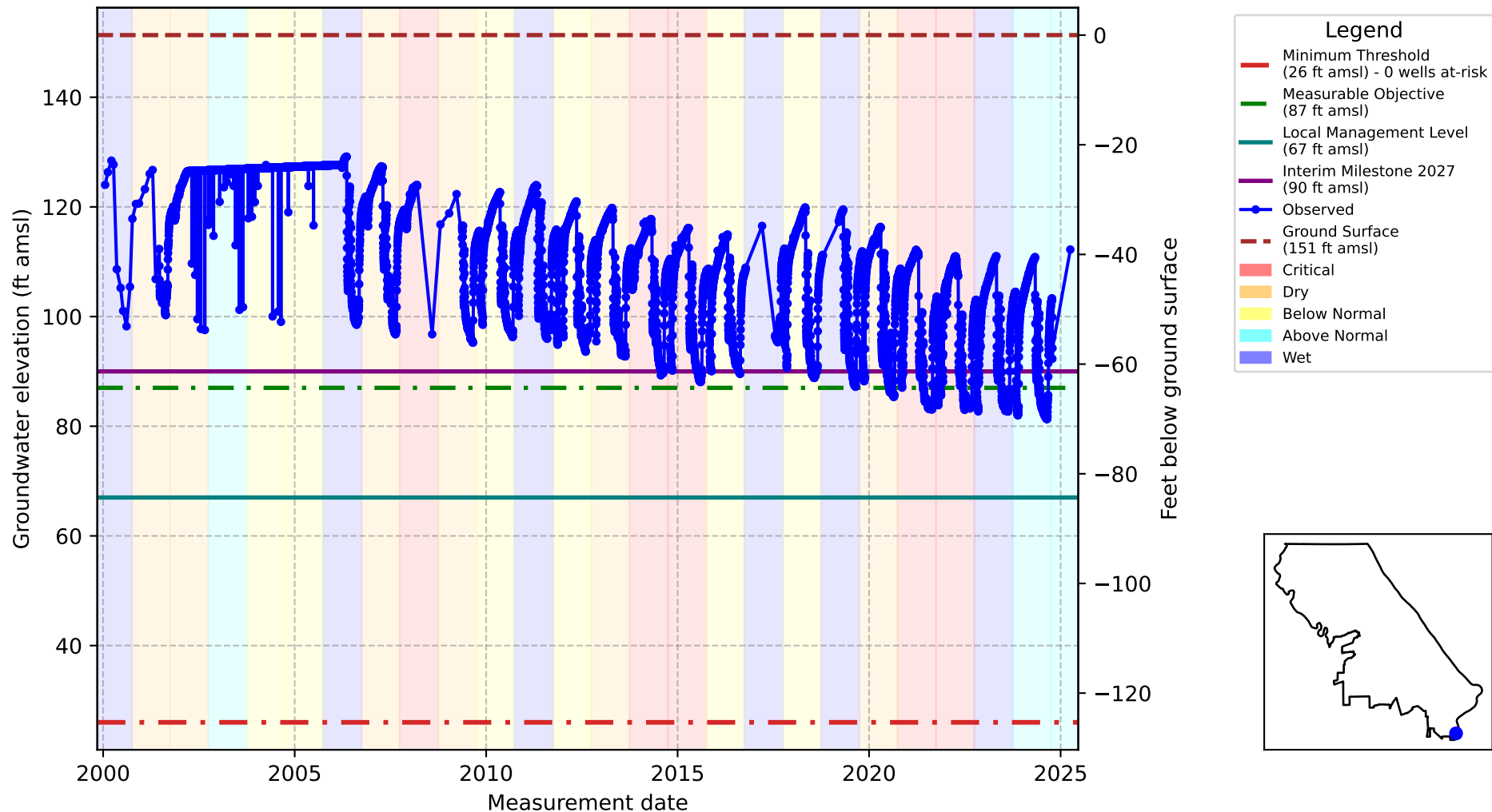
Vina Subbasin - State Well Number (SWN): 21N03E32B001M

Total Number of Domestic Wells = 7

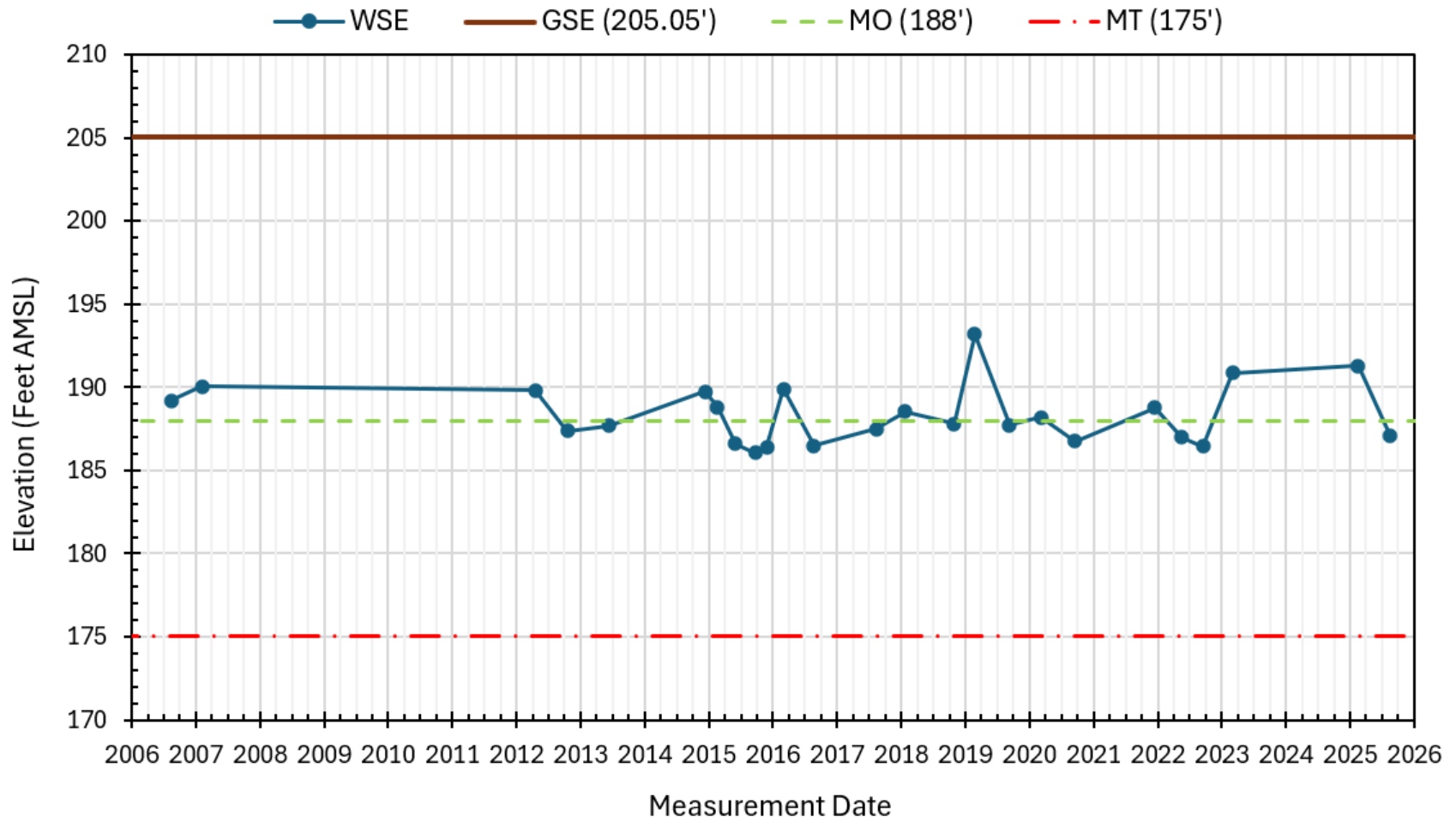


Vina Subbasin - State Well Number (SWN): 20N03E33L001M

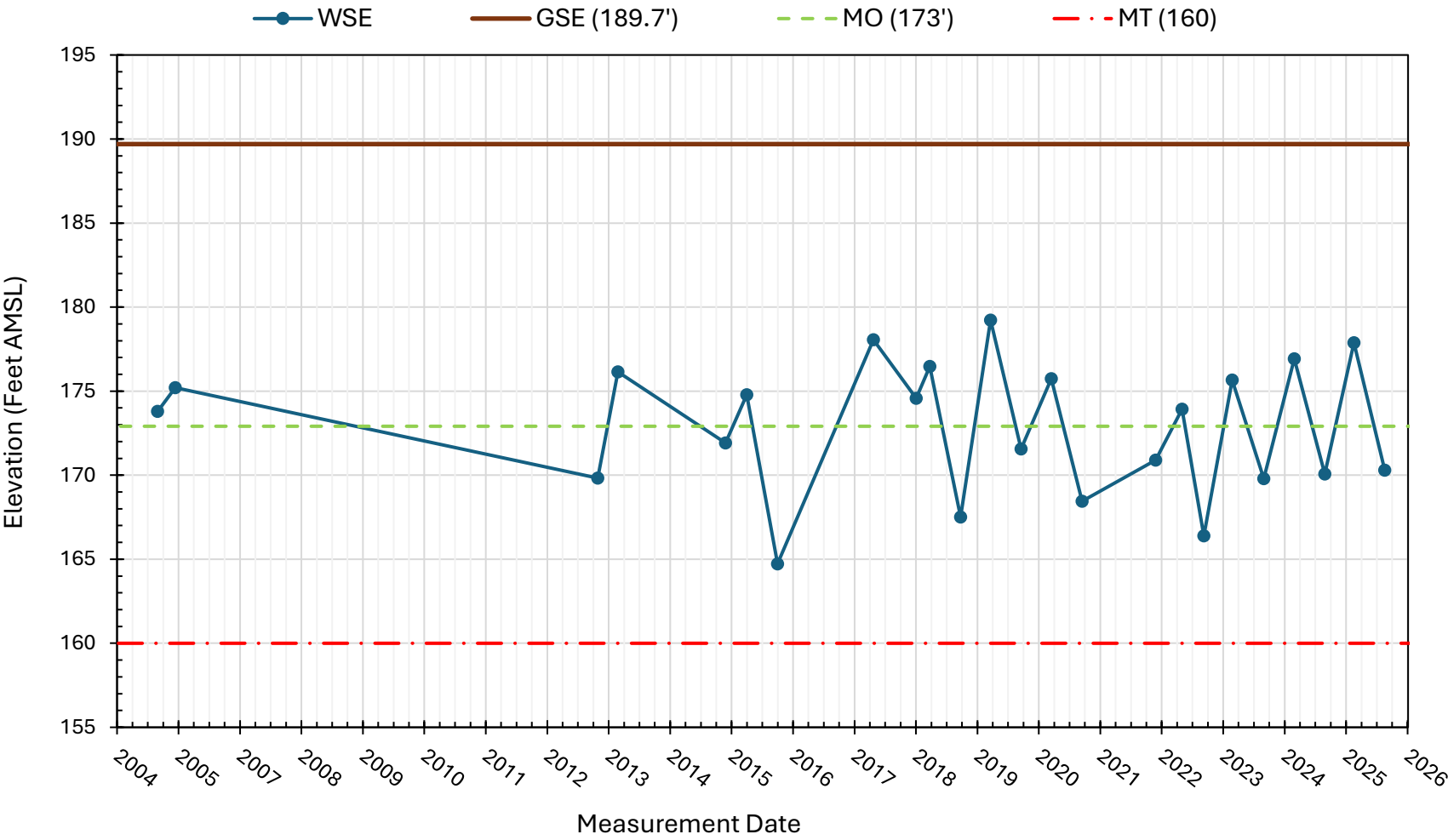
Total Number of Domestic Wells = 2



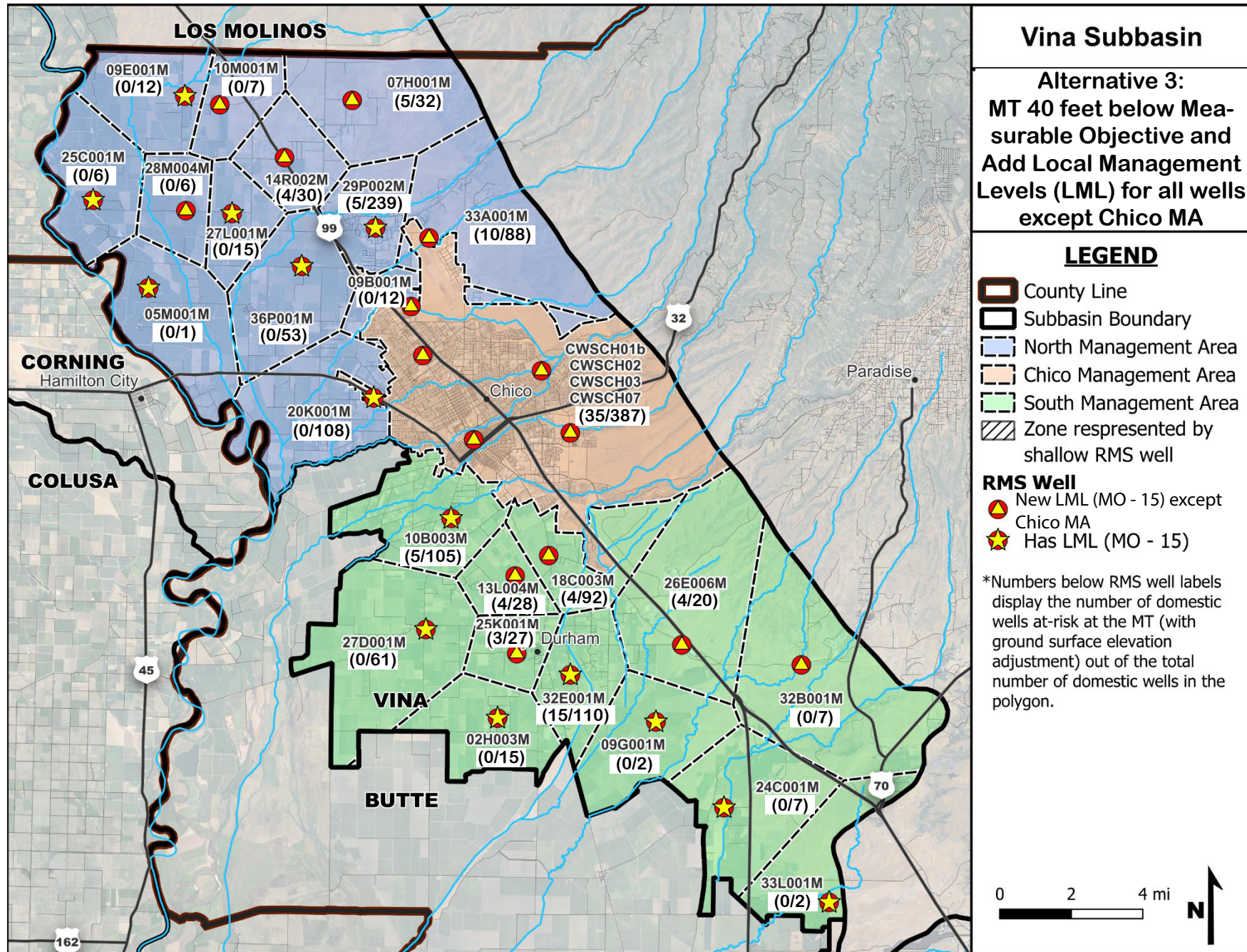
CMW-102A



SWMW-06A

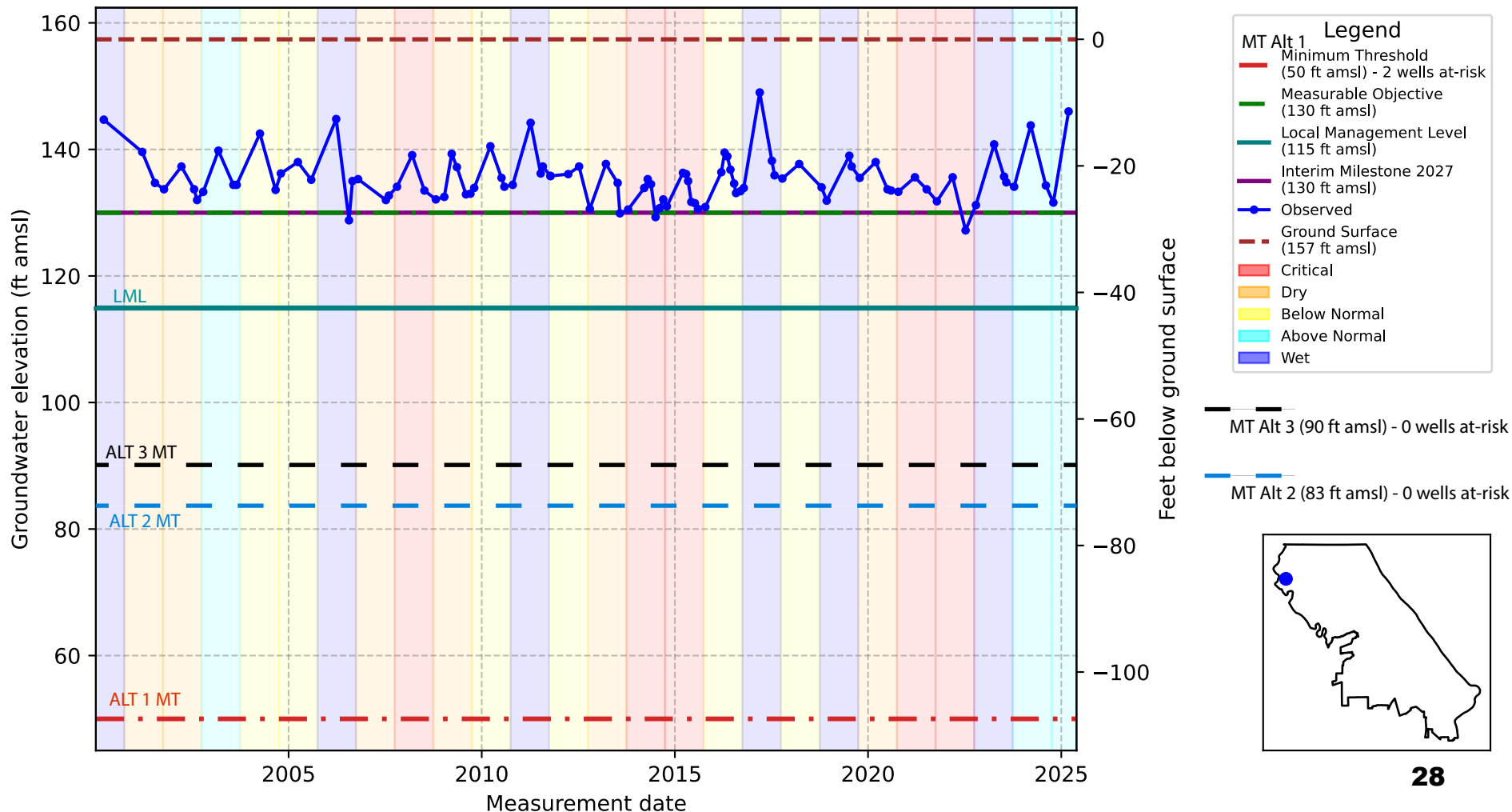


Alternative 3: MT 40 ft below Measurable Objective and Local Management Level for all wells except Chico MA



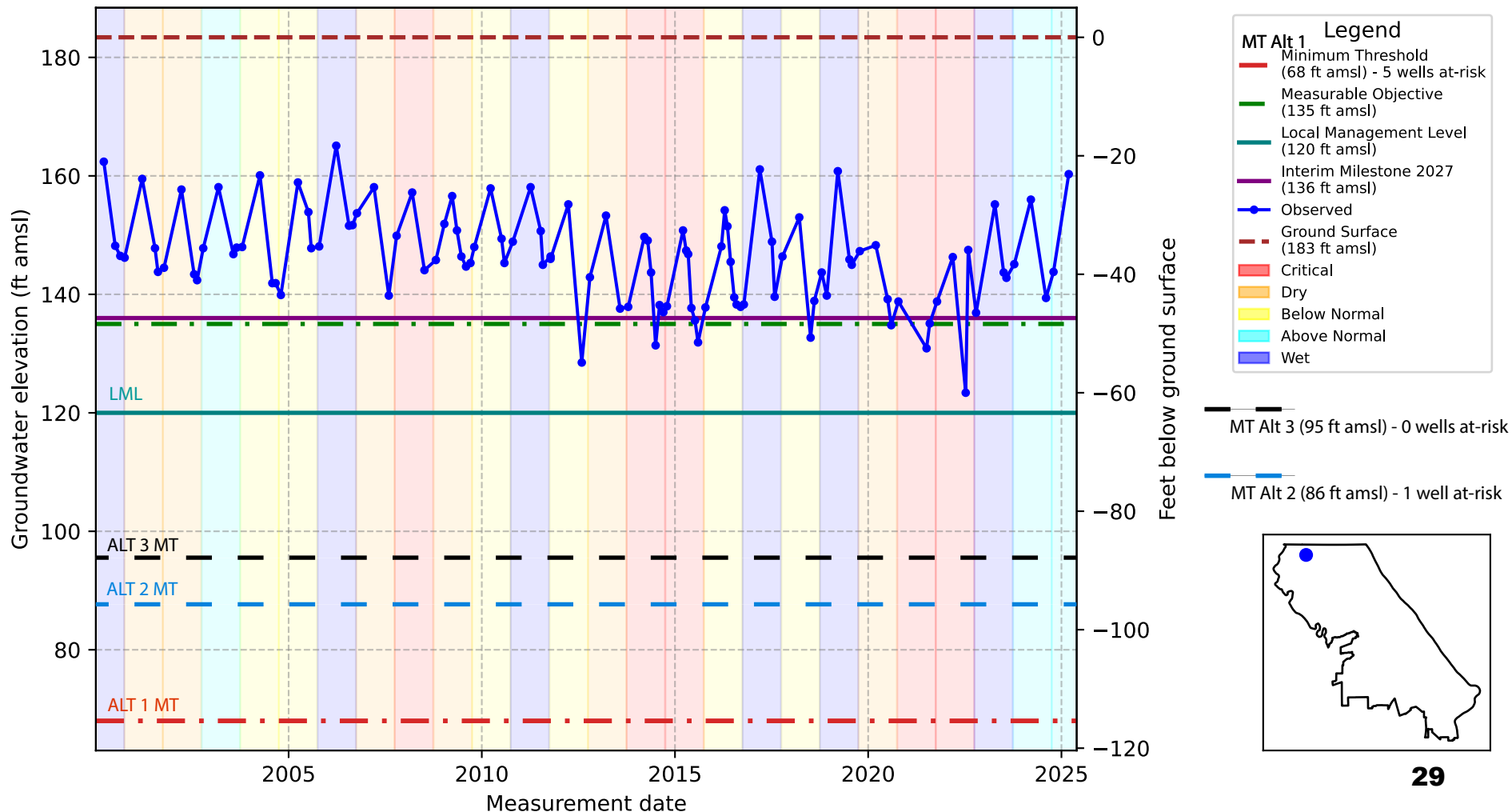
Vina Subbasin - State Well Number (SWN): 23N02W25C001M

Total Number of Domestic Wells = 6



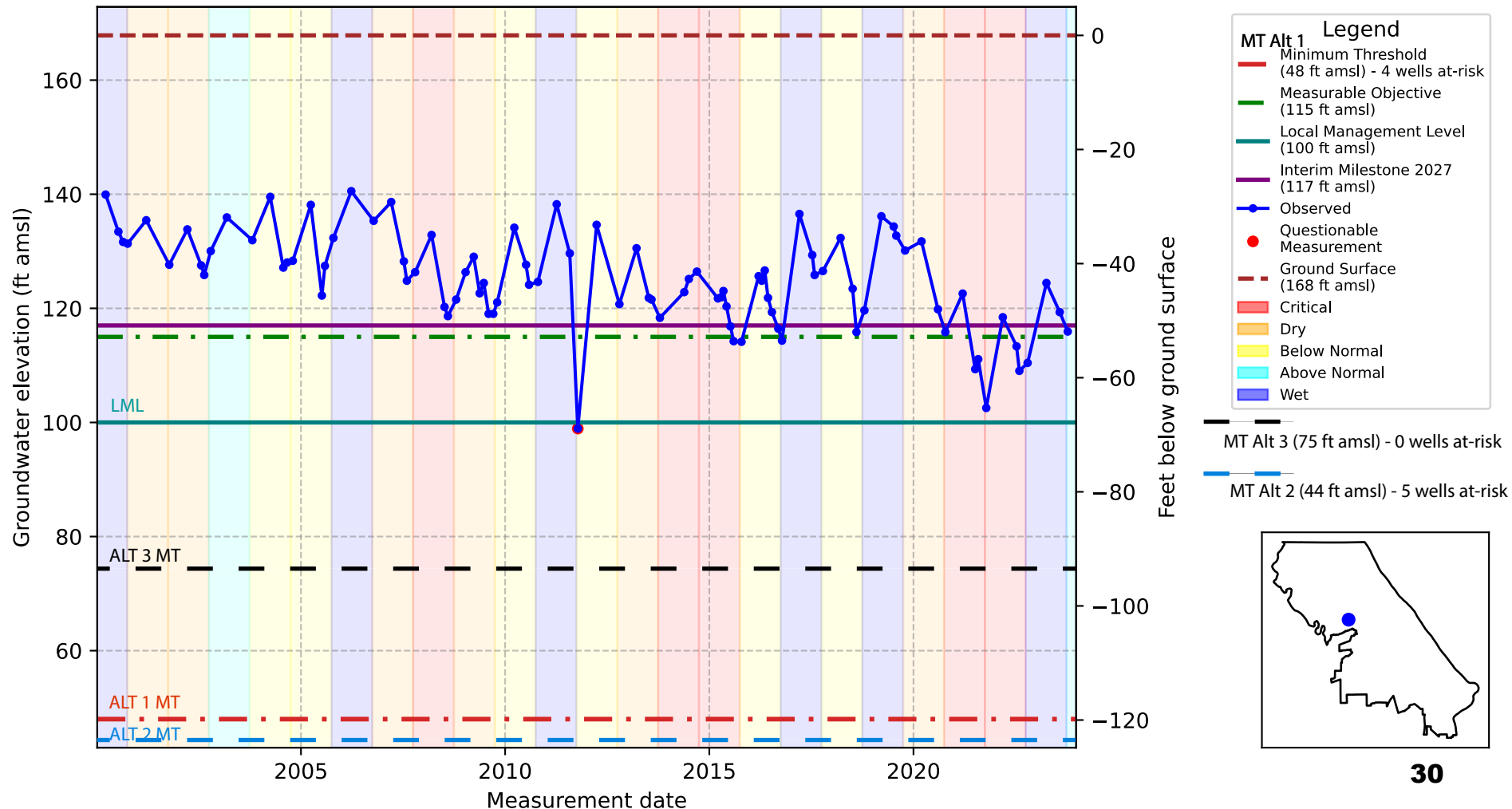
Vina Subbasin - State Well Number (SWN): 23N01W09E001M

Total Number of Domestic Wells = 12



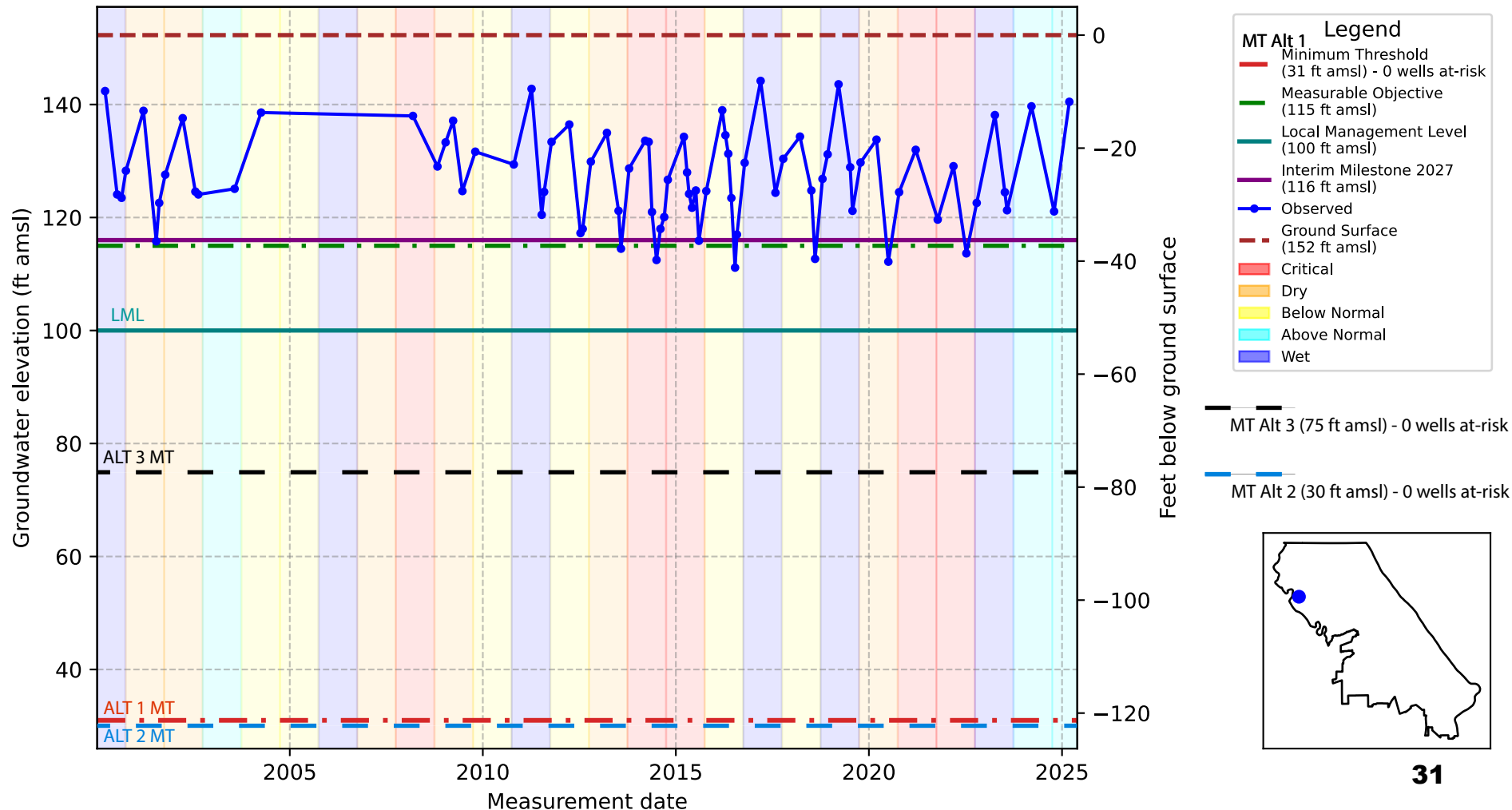
Vina Subbasin - State Well Number (SWN): 22N01E20K001M

Total Number of Domestic Wells = 108



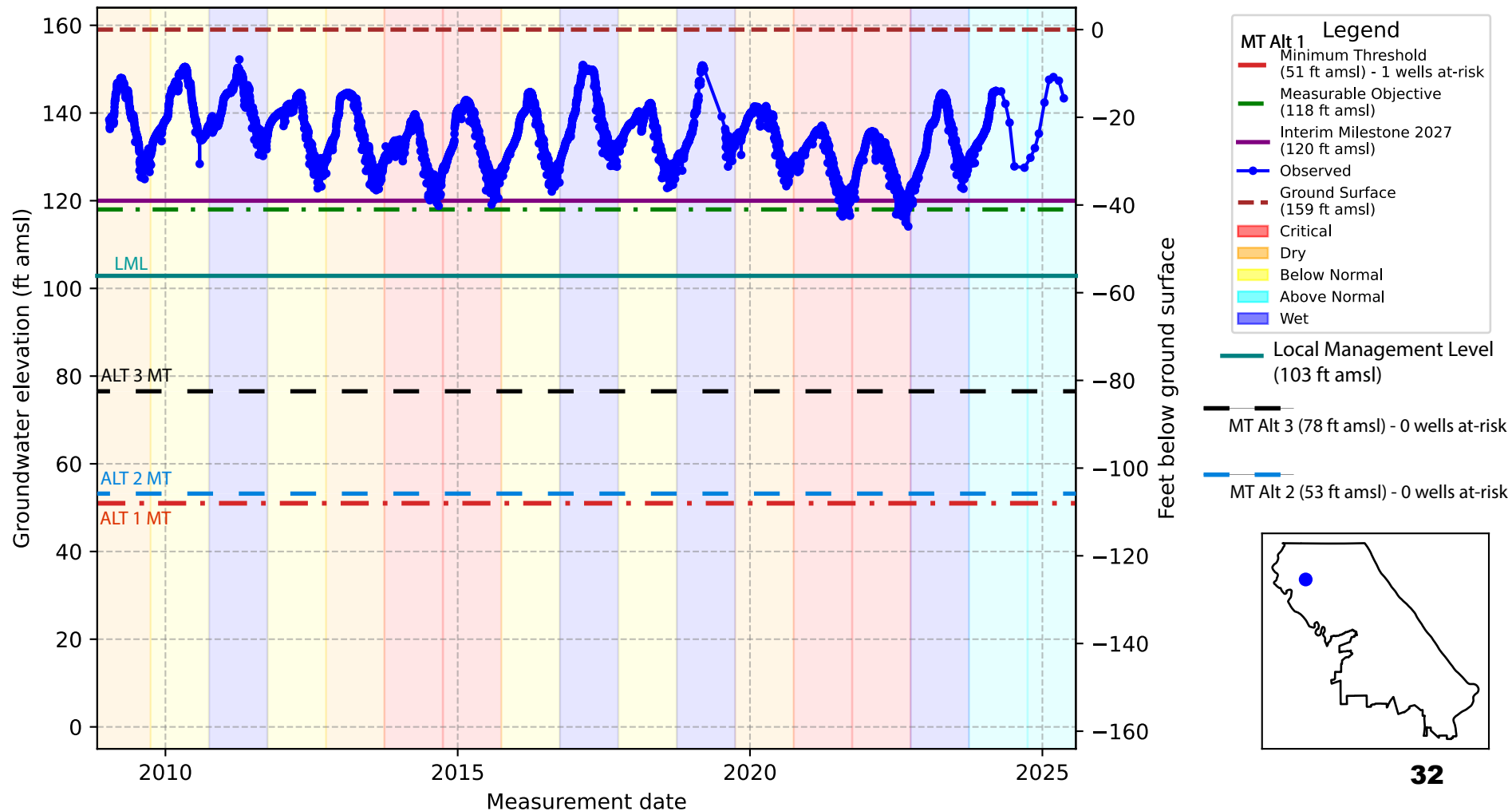
Vina Subbasin - State Well Number (SWN): 22N01W05M001M

Total Number of Domestic Wells = 1



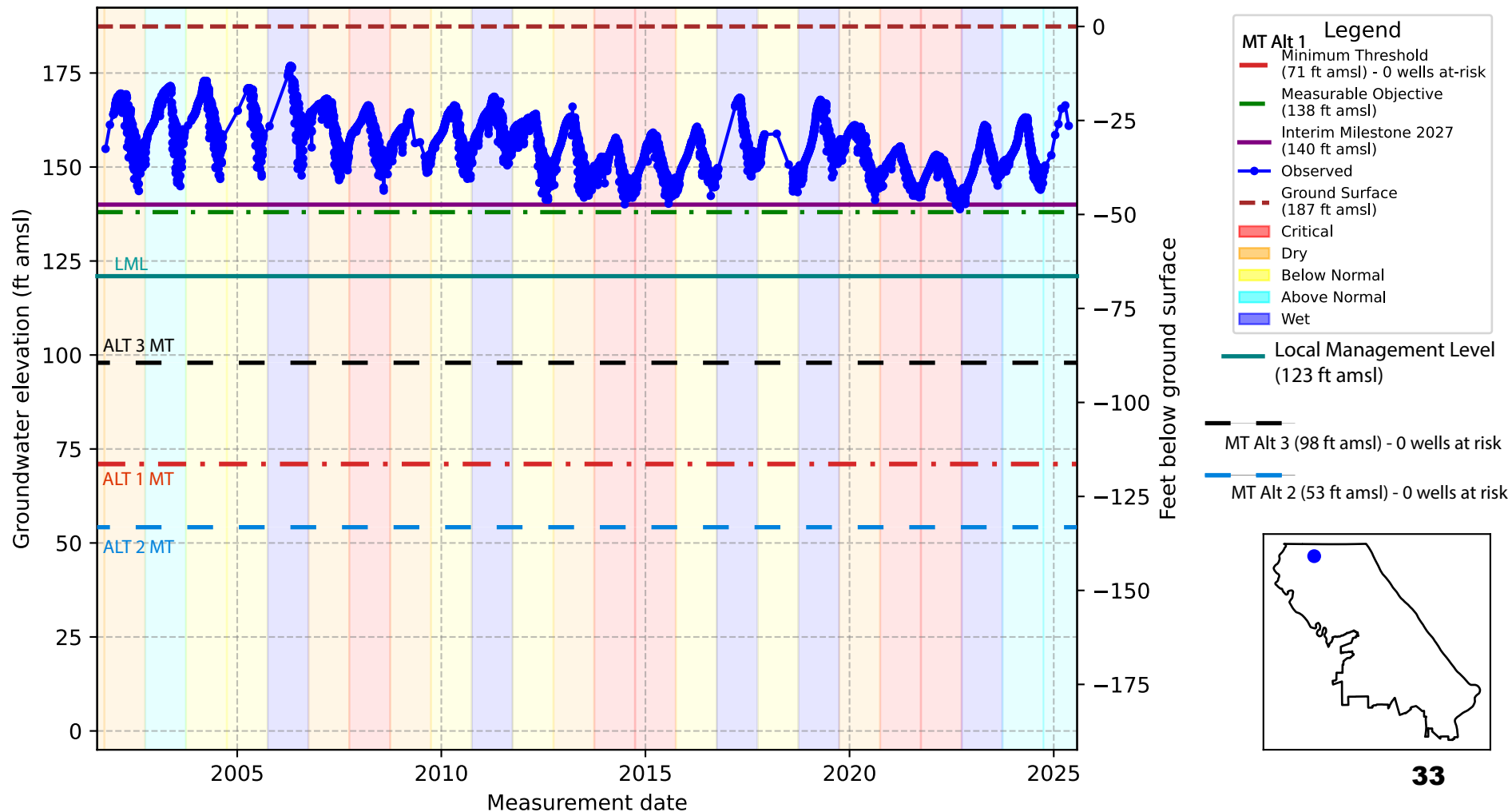
Vina Subbasin - State Well Number (SWN): 23N01W28M004M

Total Number of Domestic Wells = 6



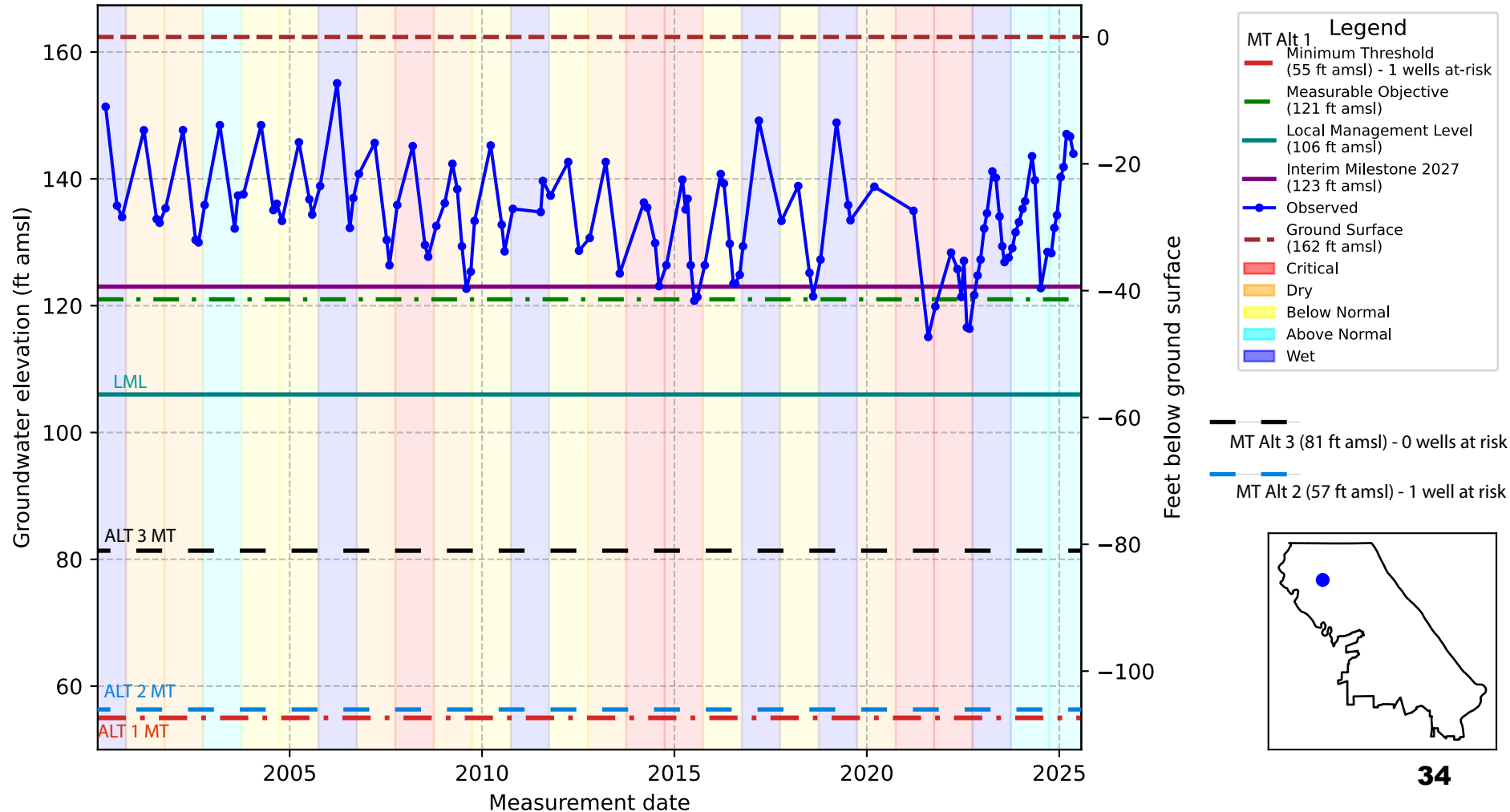
Vina Subbasin - State Well Number (SWN): 23N01W10M001M

Total Number of Domestic Wells = 7



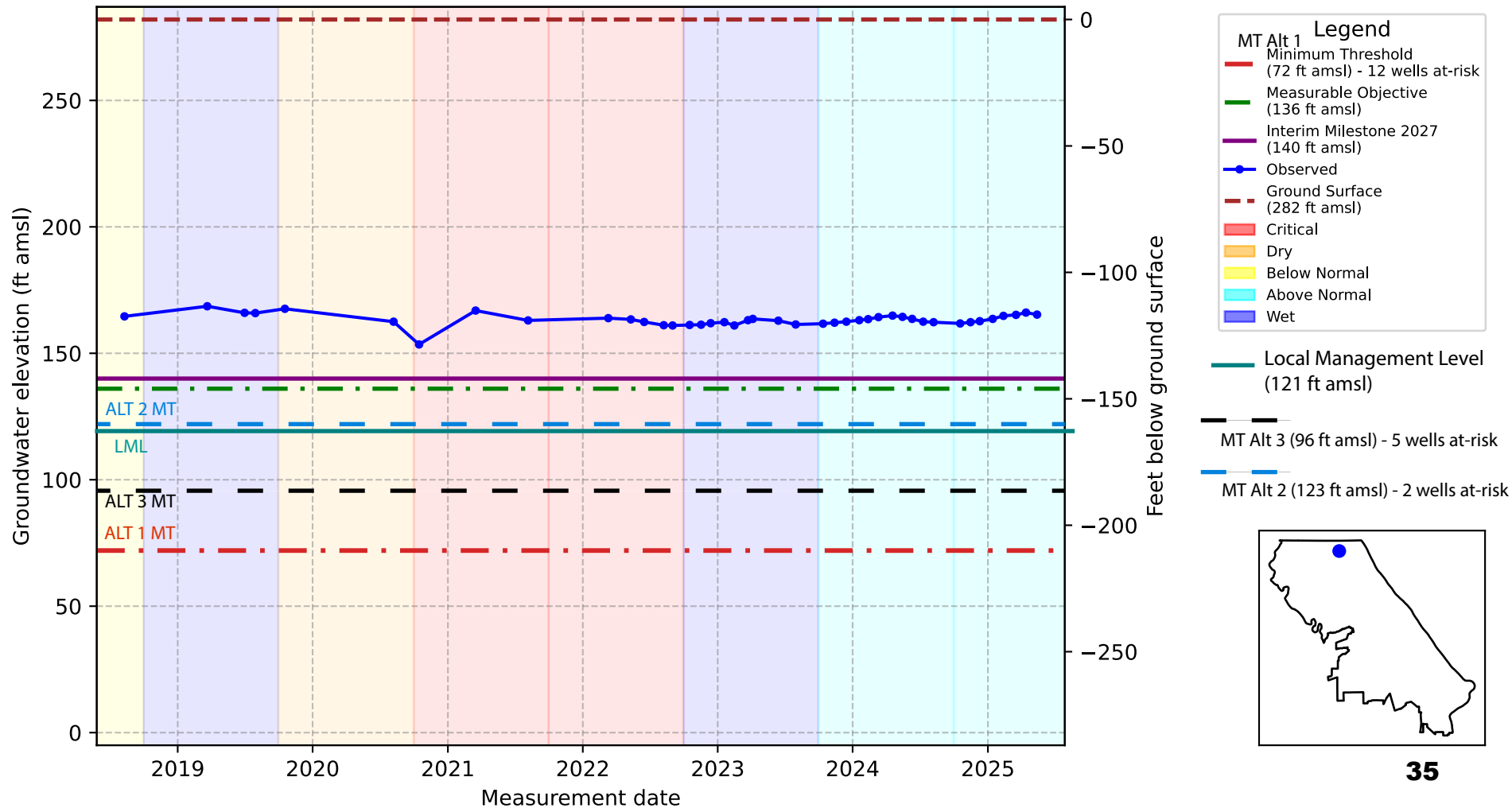
Vina Subbasin - State Well Number (SWN): 23N01W27L001M

Total Number of Domestic Wells = 15



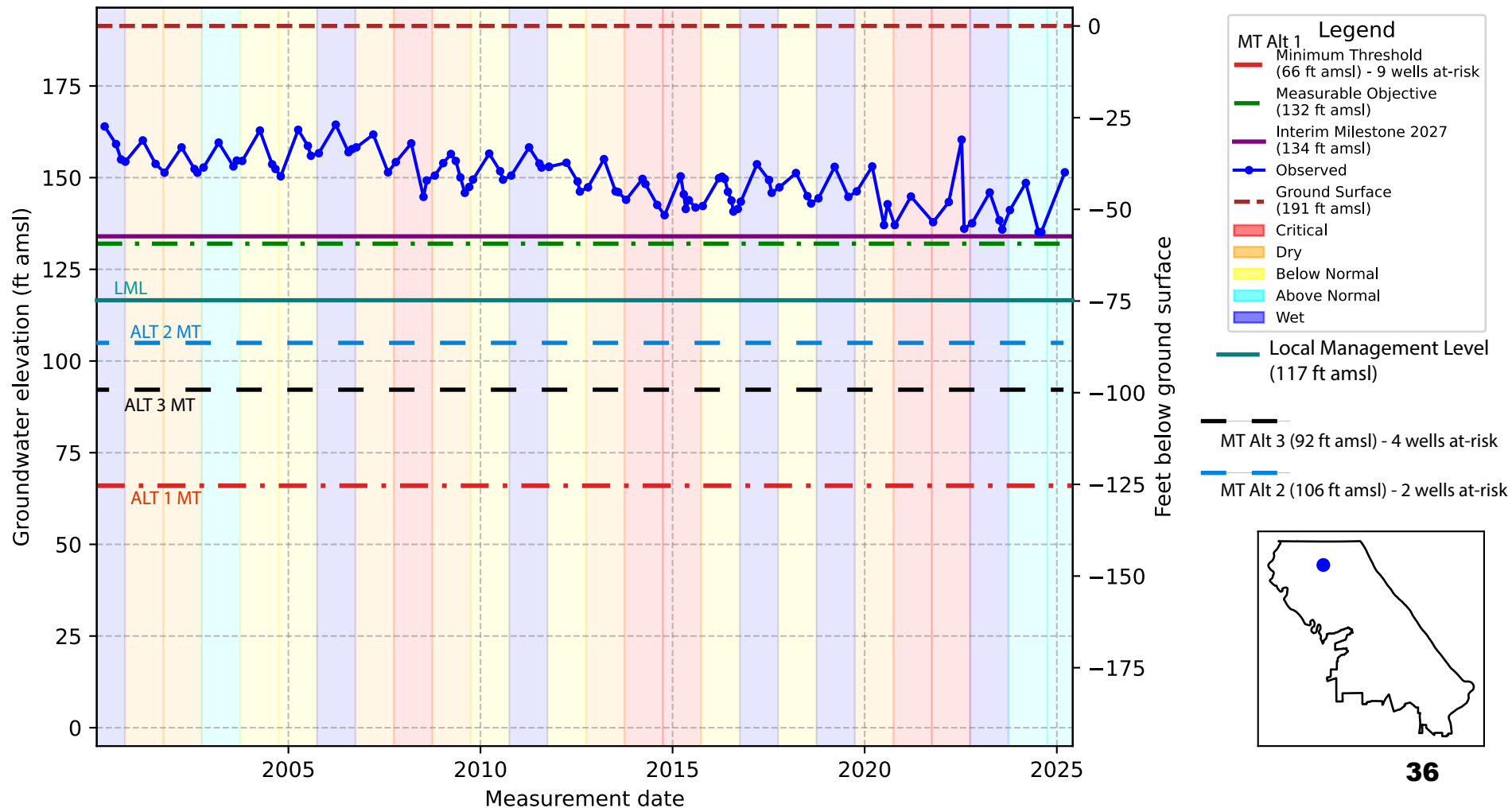
Vina Subbasin - State Well Number (SWN): 23N01E07H001M

Total Number of Domestic Wells = 32



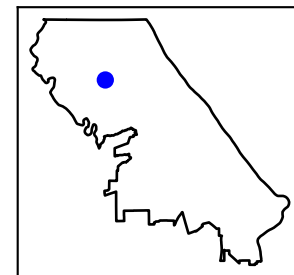
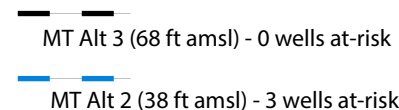
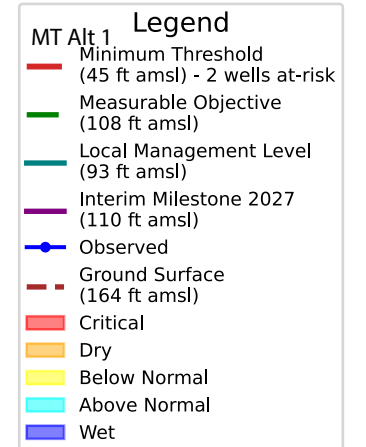
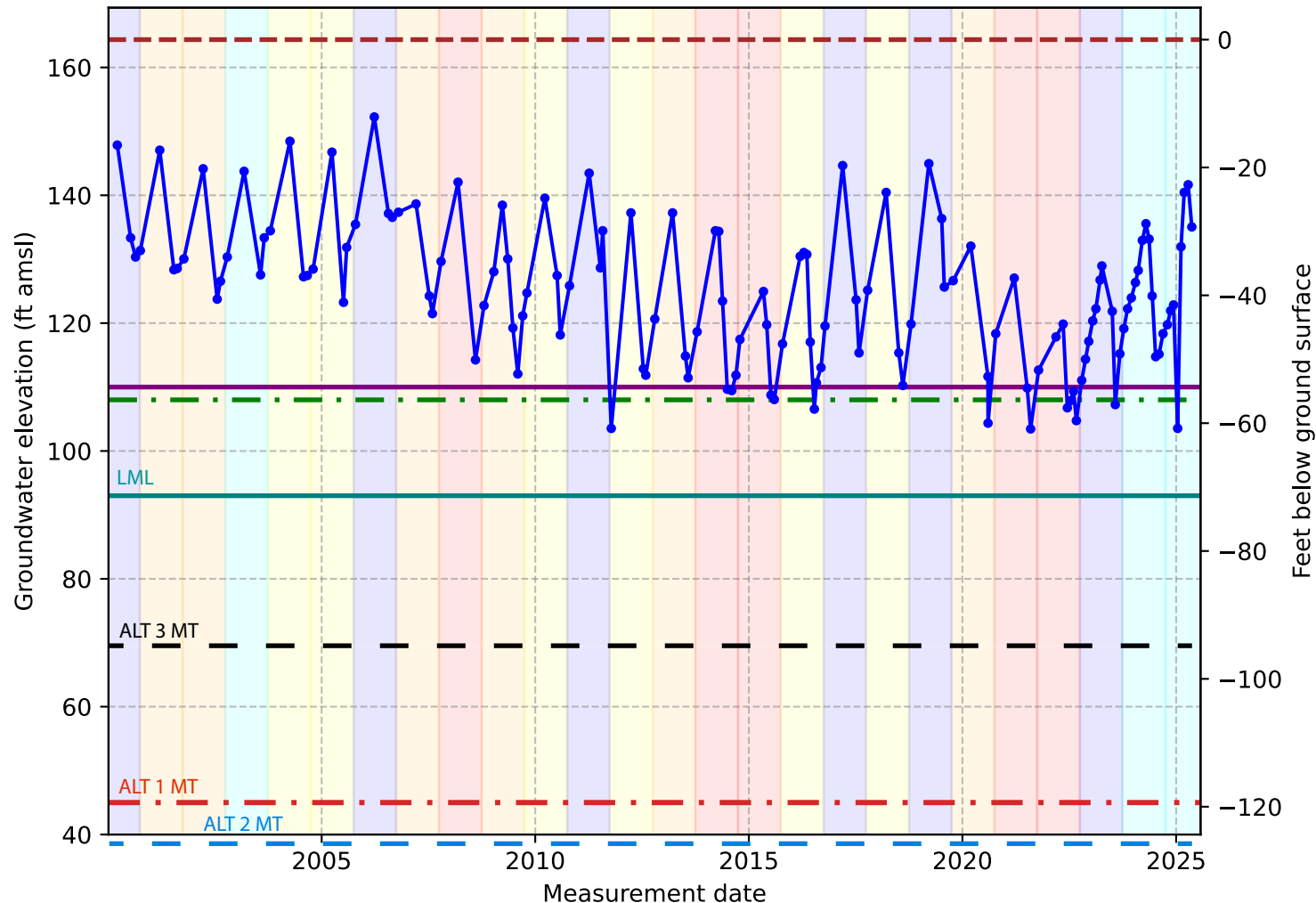
Vina Subbasin - State Well Number (SWN): 23N01W14R002M

Total Number of Domestic Wells = 30



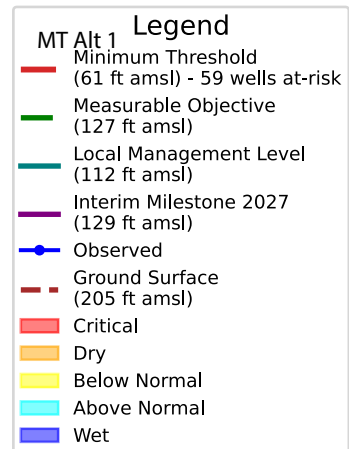
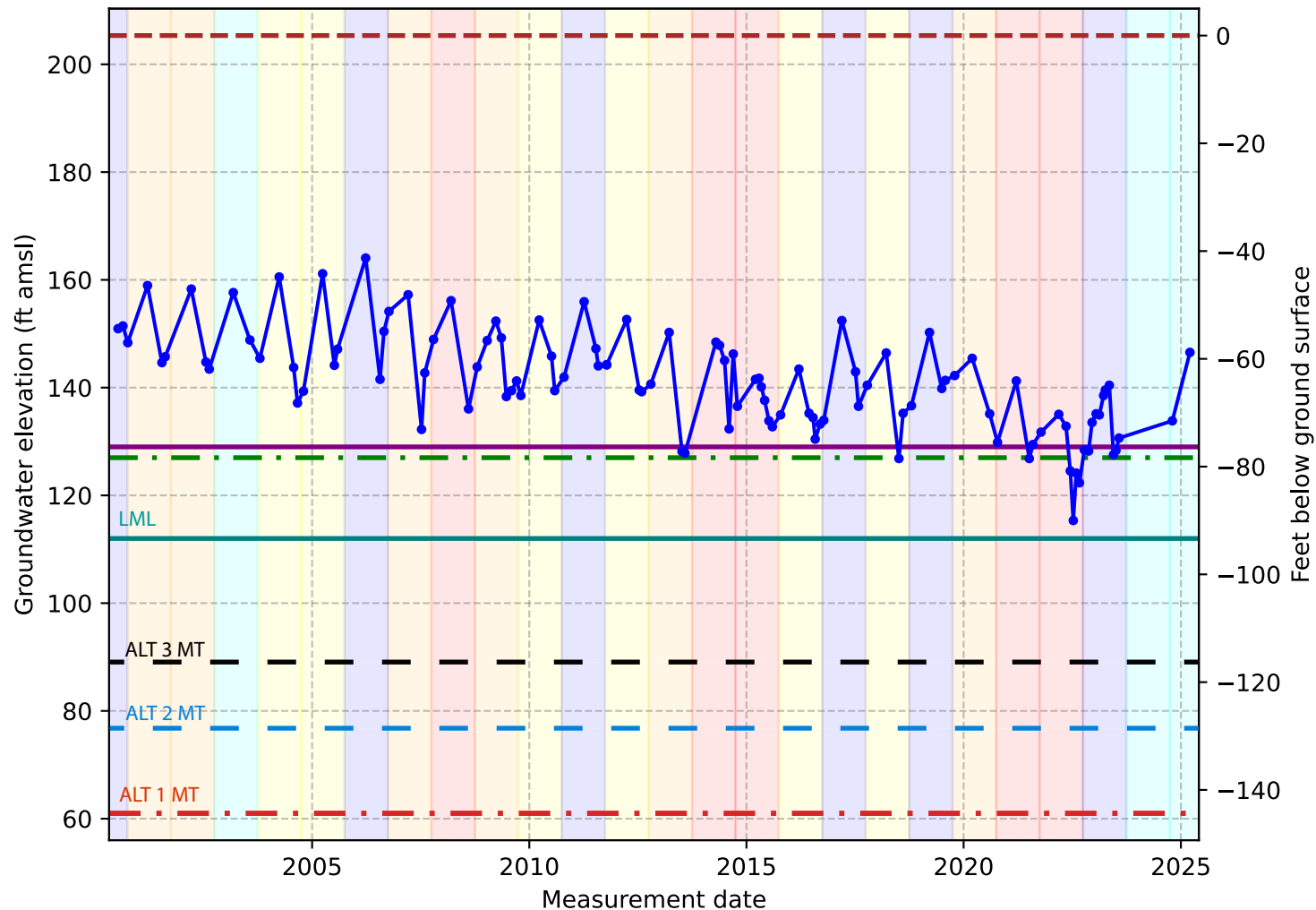
Vina Subbasin - State Well Number (SWN): 23N01W36P001M

Total Number of Domestic Wells = 53



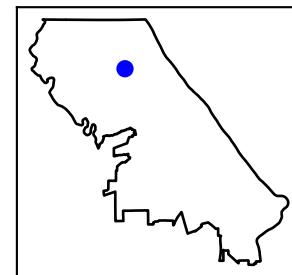
Vina Subbasin - State Well Number (SWN): 23N01E29P002M

Total Number of Domestic Wells = 239



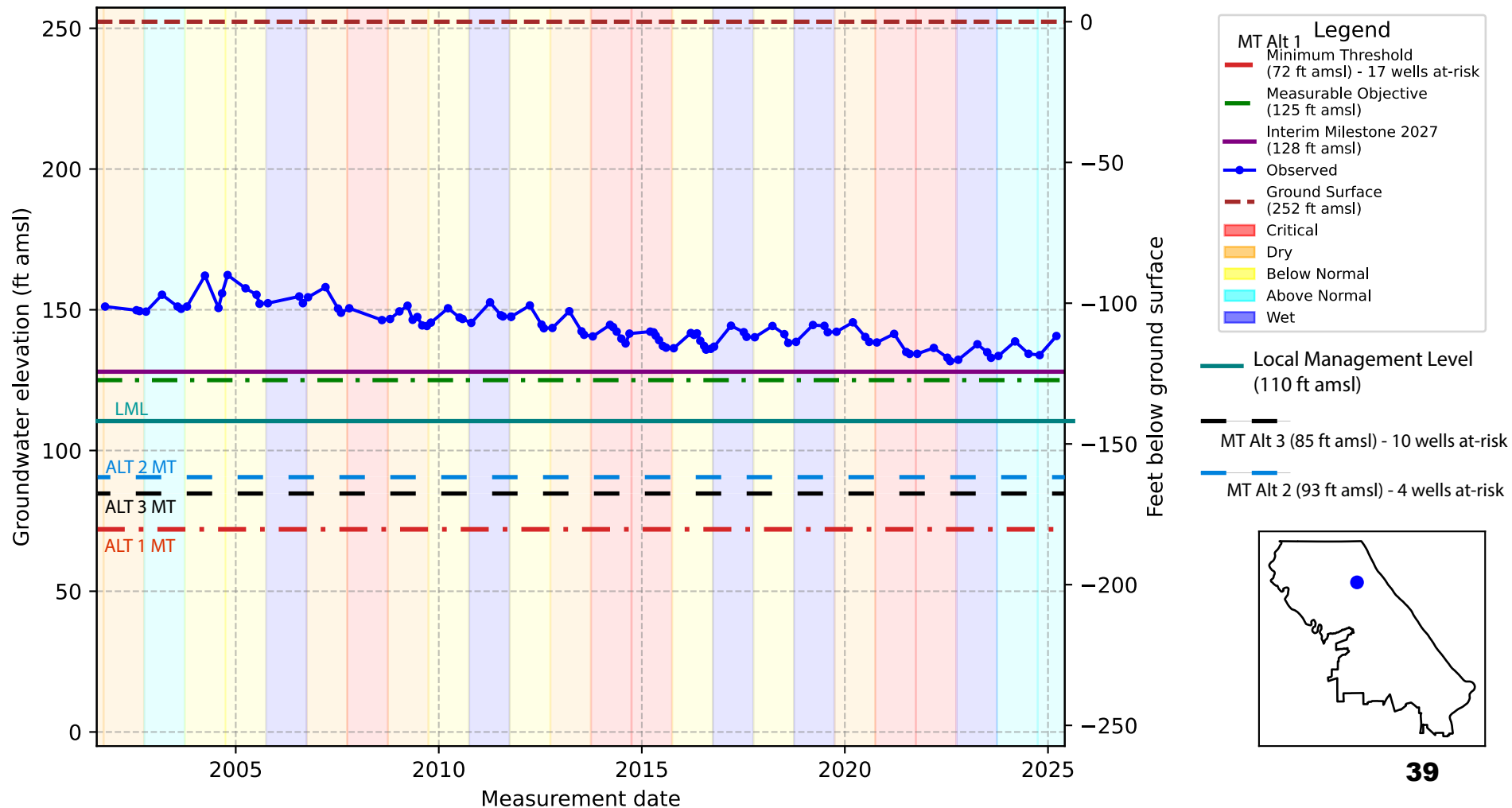
MT Alt 3 (87 ft amsl) - 5 wells at-risk

MT Alt 2 (78 ft amsl) - 12 wells at-risk



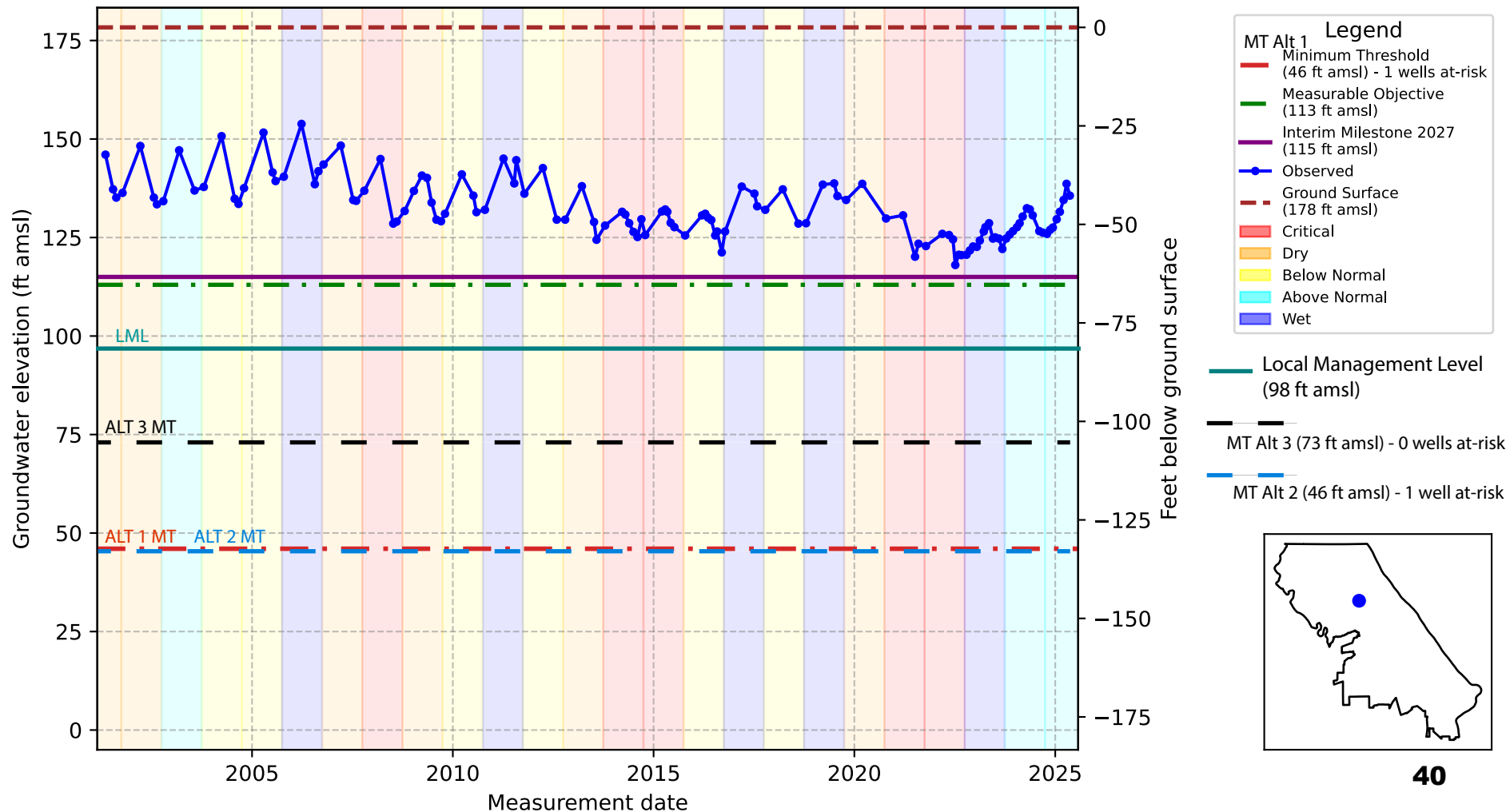
Vina Subbasin - State Well Number (SWN): 23N01E33A001M

Total Number of Domestic Wells = 88



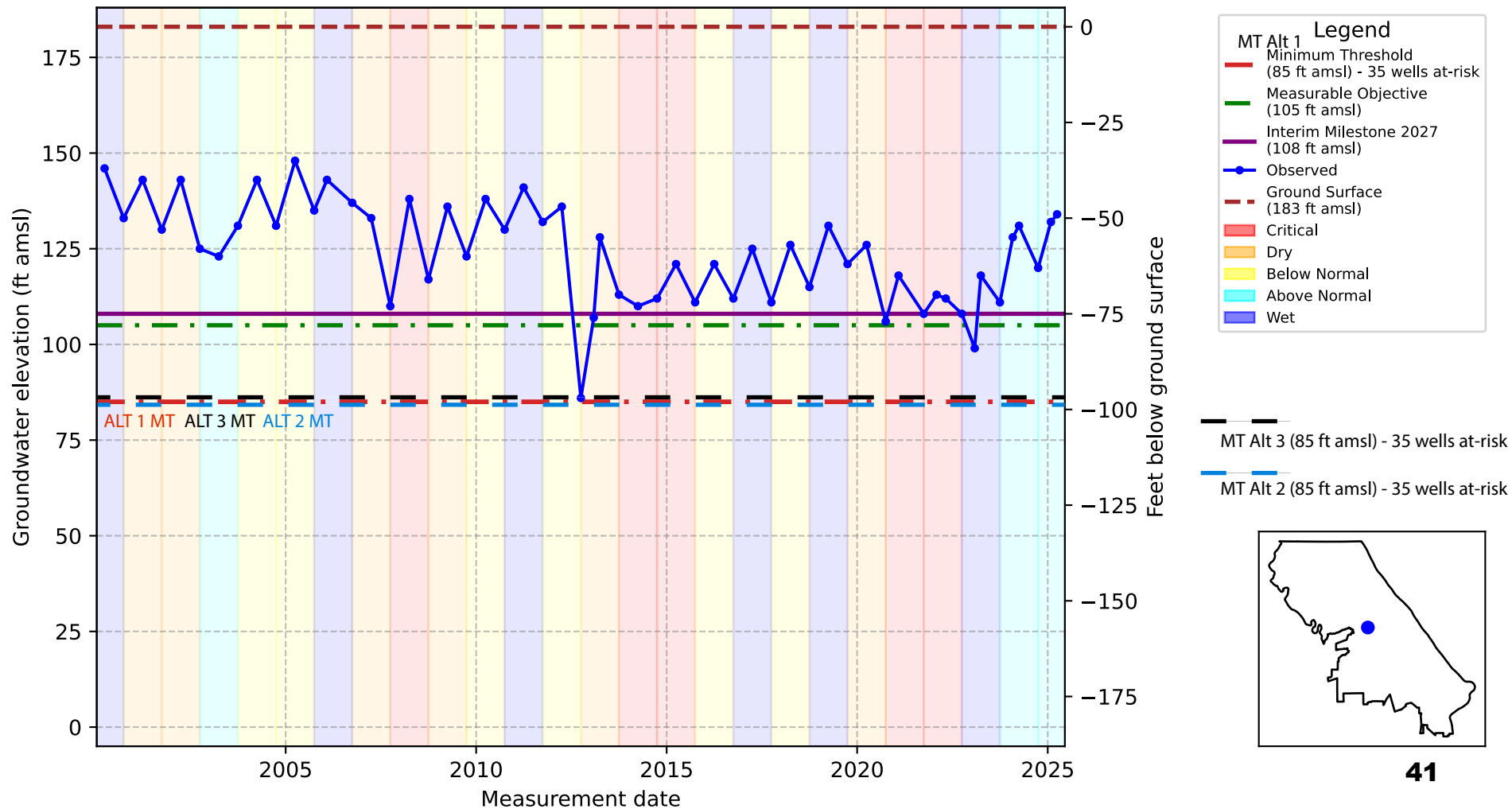
Vina Subbasin - State Well Number (SWN): 22N01E09B001M

Total Number of Domestic Wells = 12



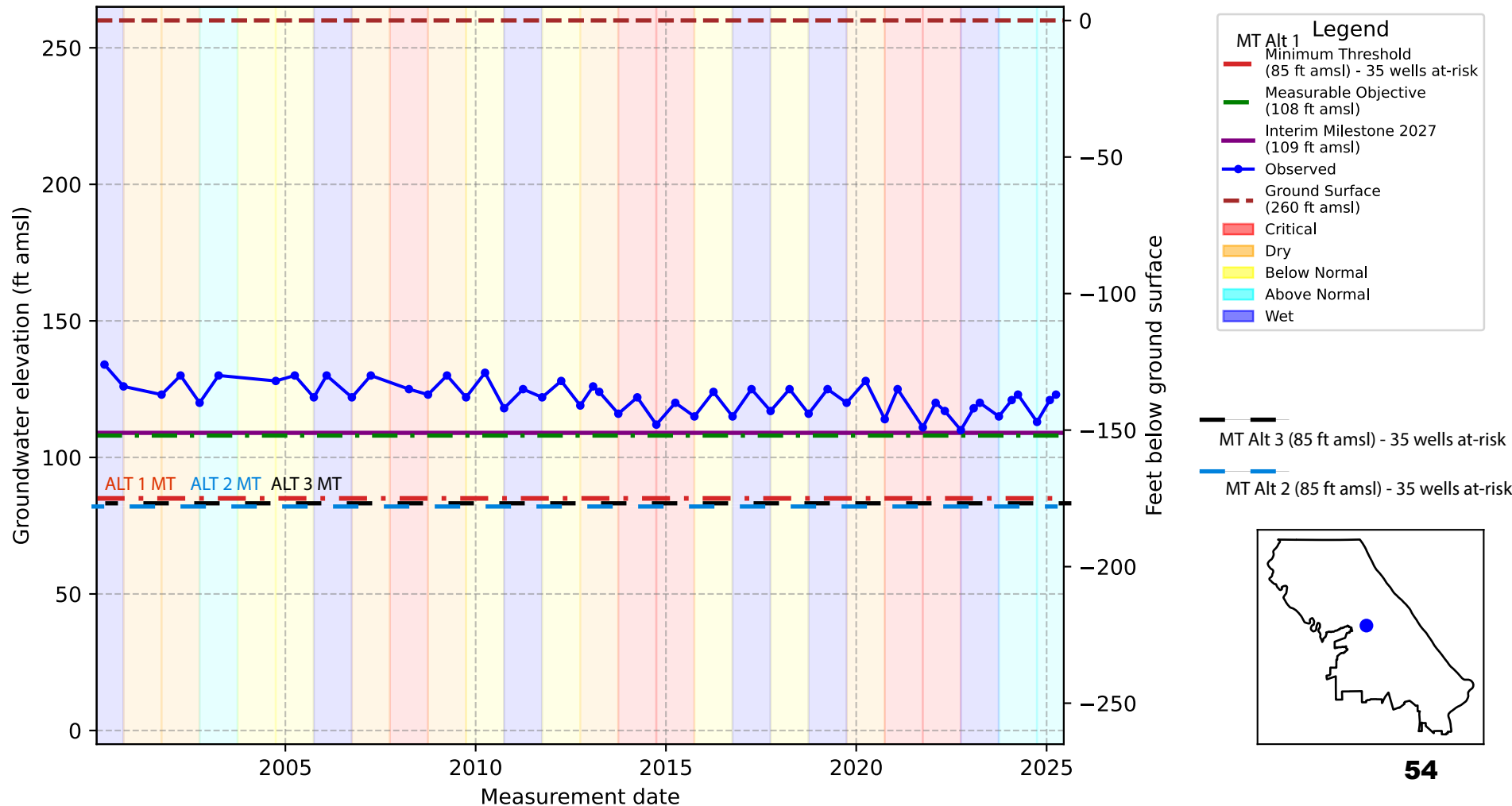
Vina Subbasin - State Well Number (SWN): CWSCH02

Total Number of Domestic Wells = 387



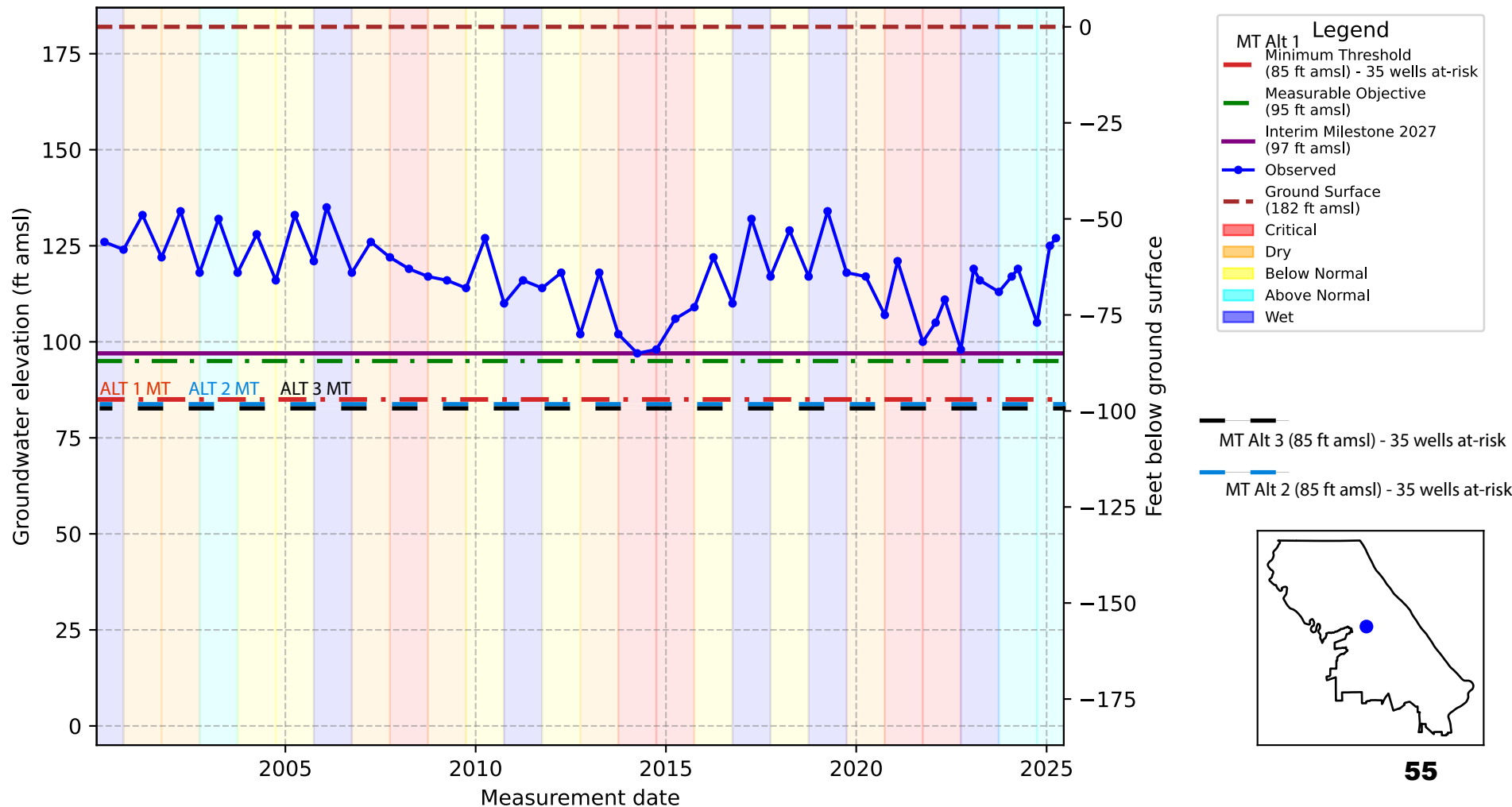
Vina Subbasin - State Well Number (SWN): CWSCH03

Total Number of Domestic Wells = 387



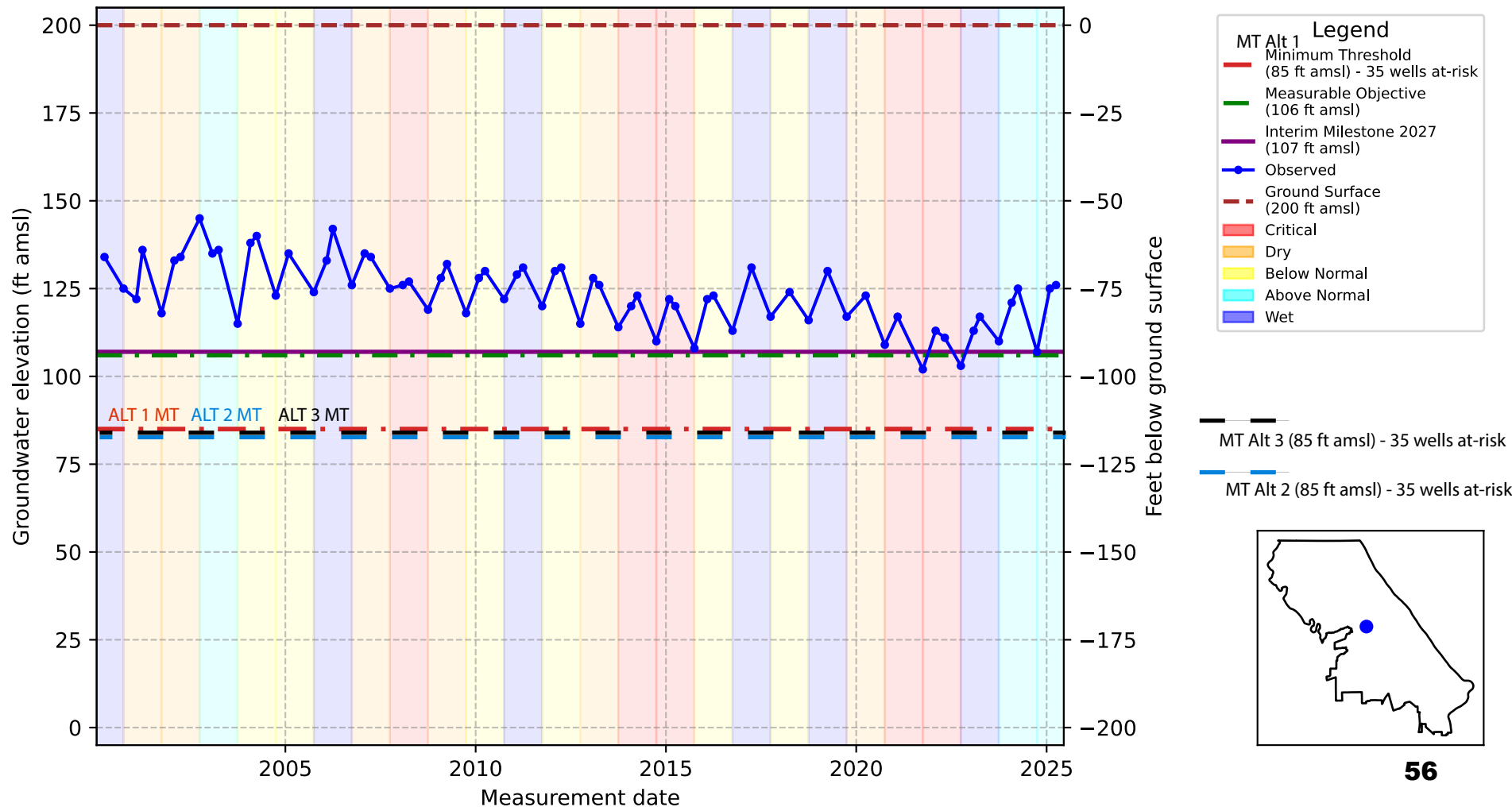
Vina Subbasin - State Well Number (SWN): CWSCH07

Total Number of Domestic Wells = 387

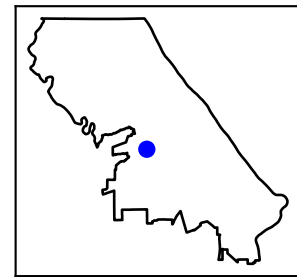


Vina Subbasin - State Well Number (SWN): CWSCH01b

Total Number of Domestic Wells = 387

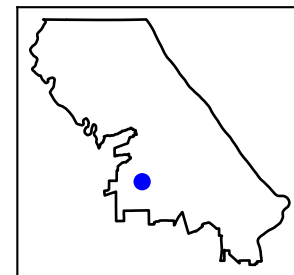
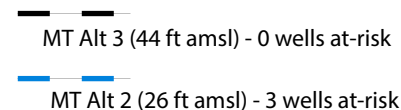
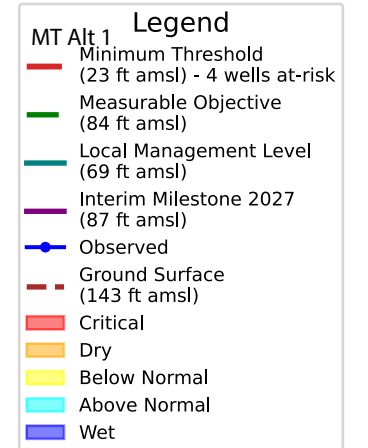
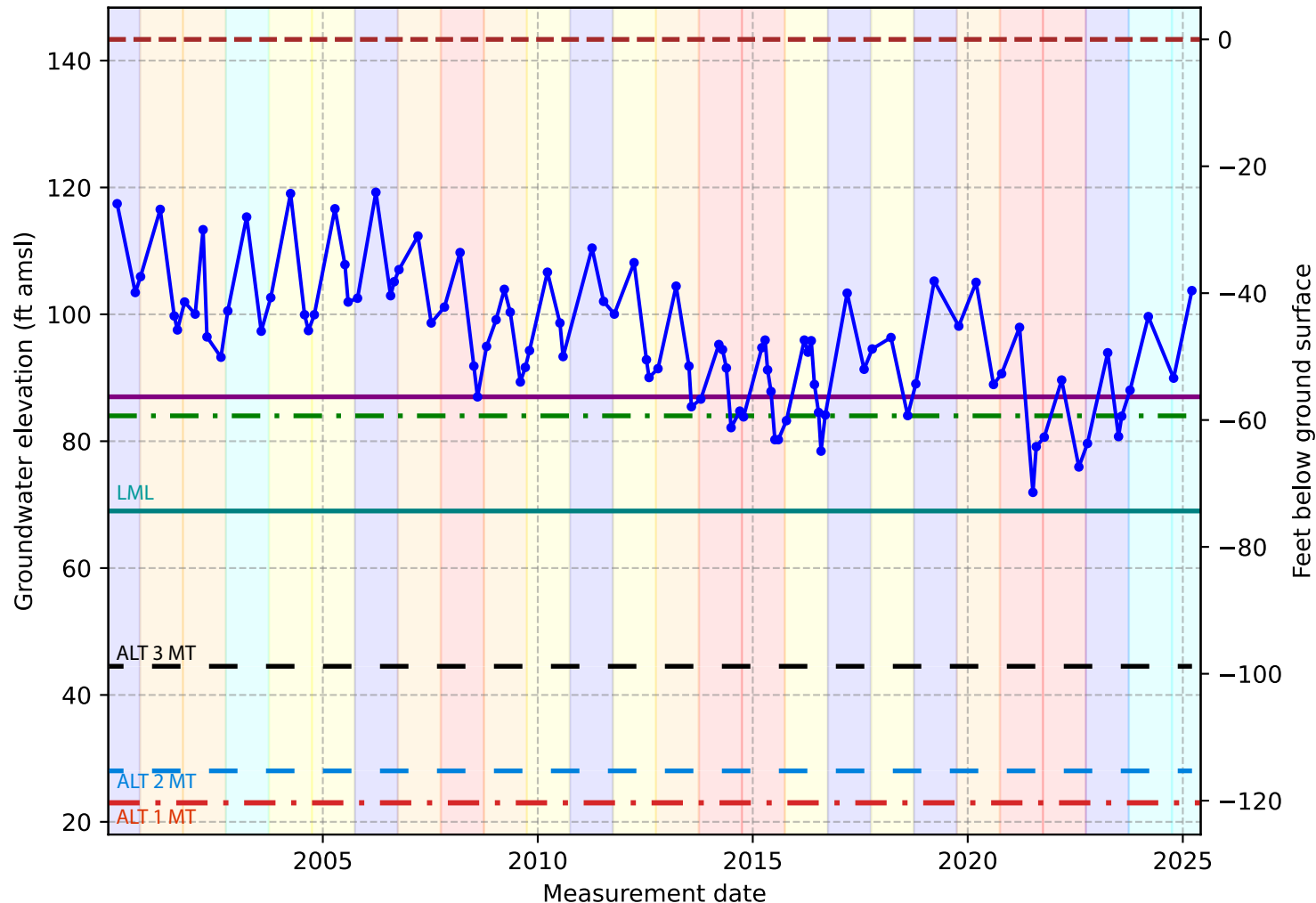


Total Number of Domestic Wells = 105



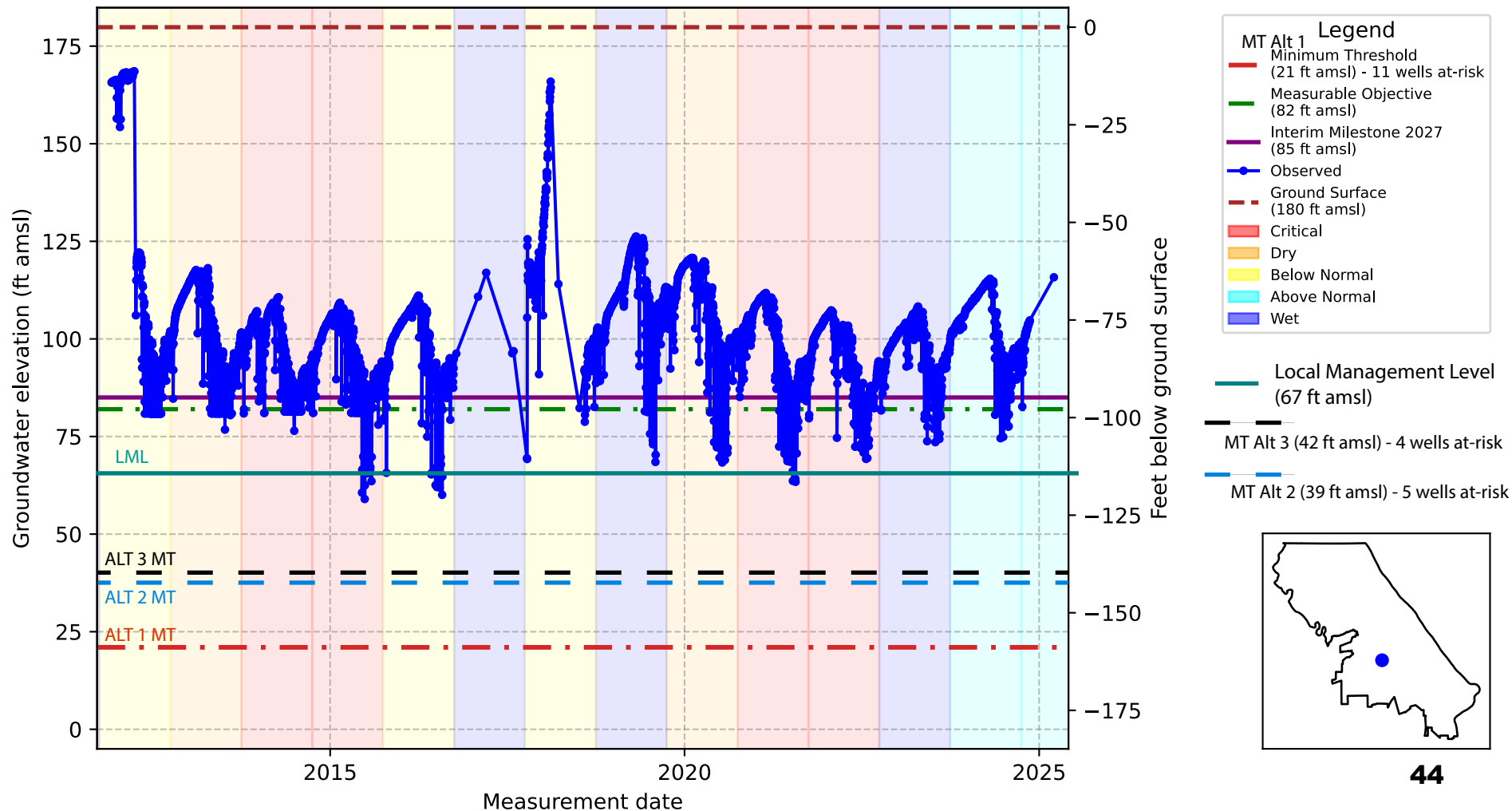
Vina Subbasin - State Well Number (SWN): 21N01E27D001M

Total Number of Domestic Wells = 61



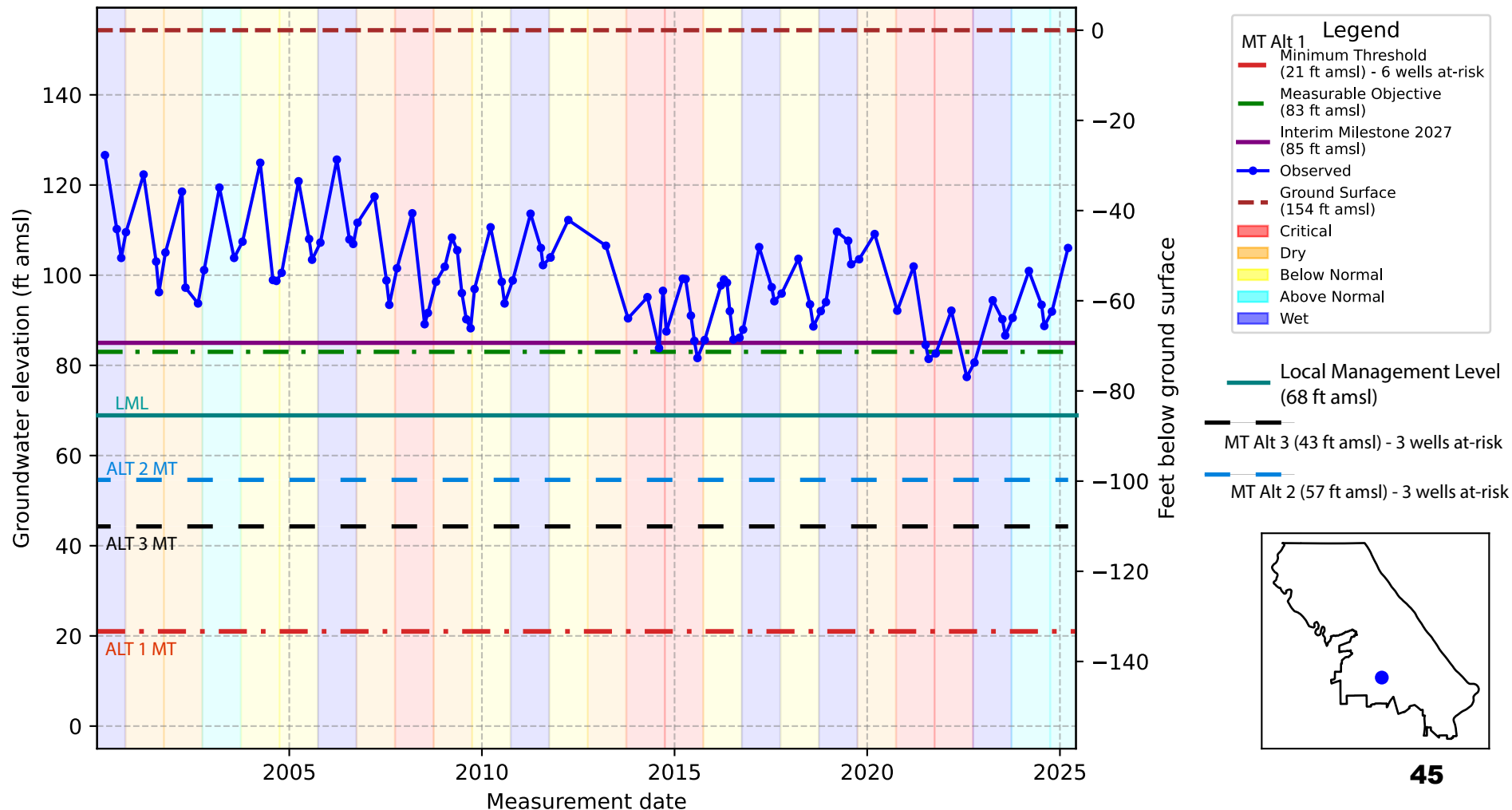
Vina Subbasin - State Well Number (SWN): 21N01E13L004M

Total Number of Domestic Wells = 28



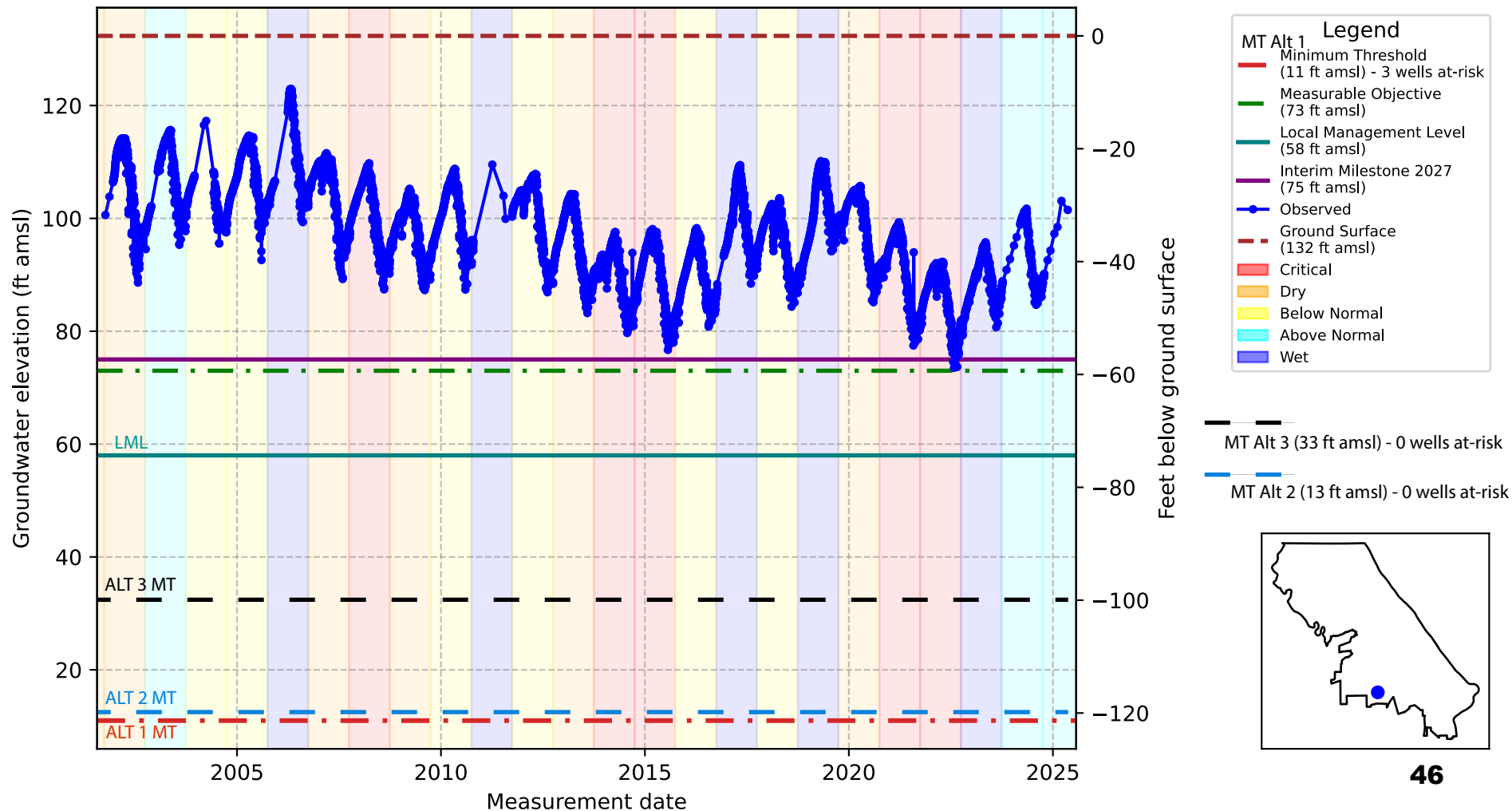
Vina Subbasin - State Well Number (SWN): 21N01E25K001M

Total Number of Domestic Wells = 27



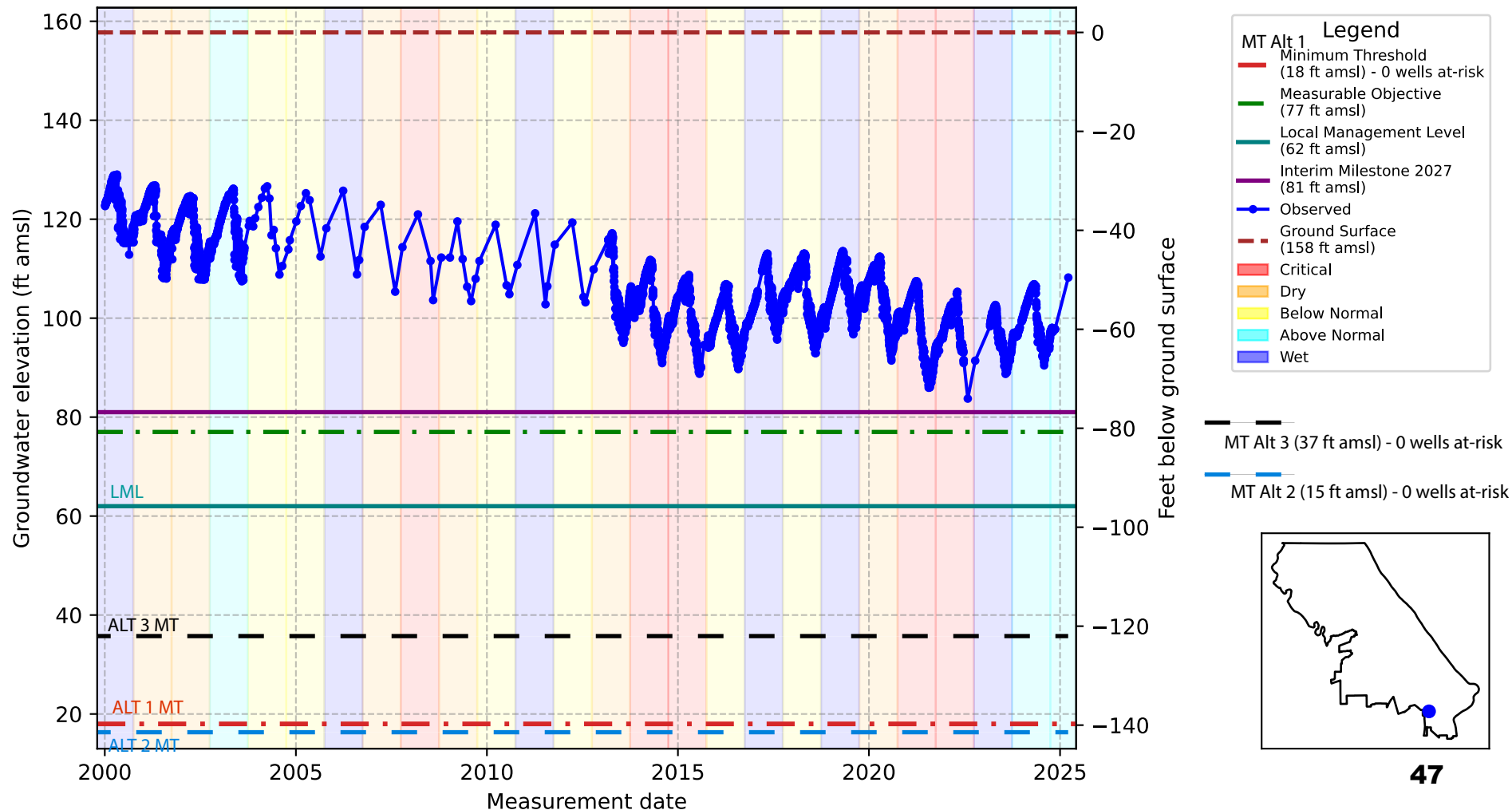
Vina Subbasin - State Well Number (SWN): 20N01E02H003M

Total Number of Domestic Wells = 15



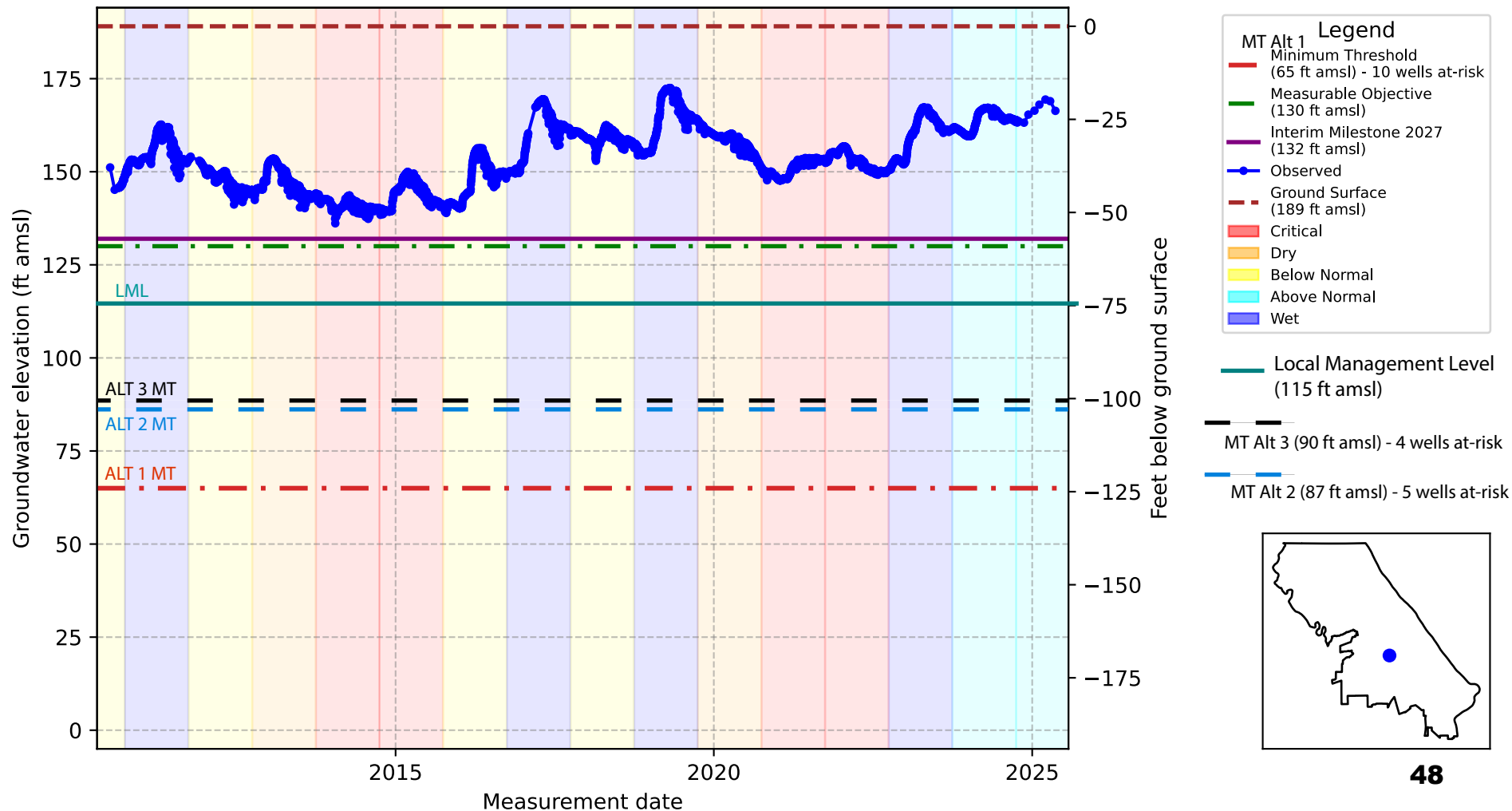
Vina Subbasin - State Well Number (SWN): 20N02E24C001M

Total Number of Domestic Wells = 7



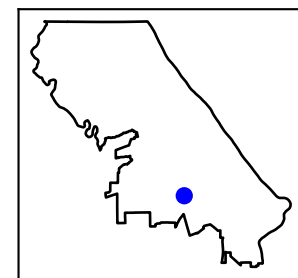
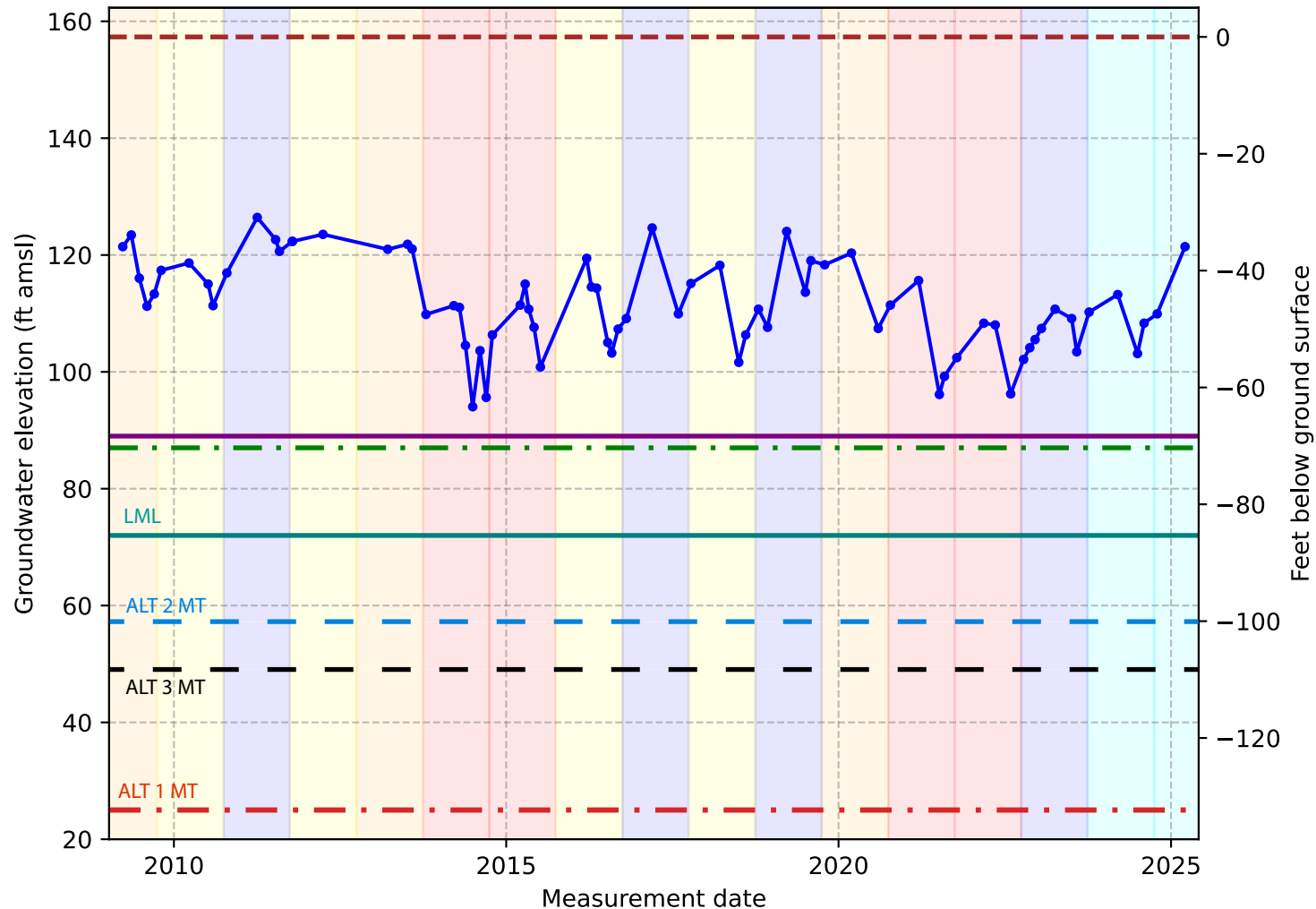
Vina Subbasin - State Well Number (SWN): 21N02E18C003M

Total Number of Domestic Wells = 92



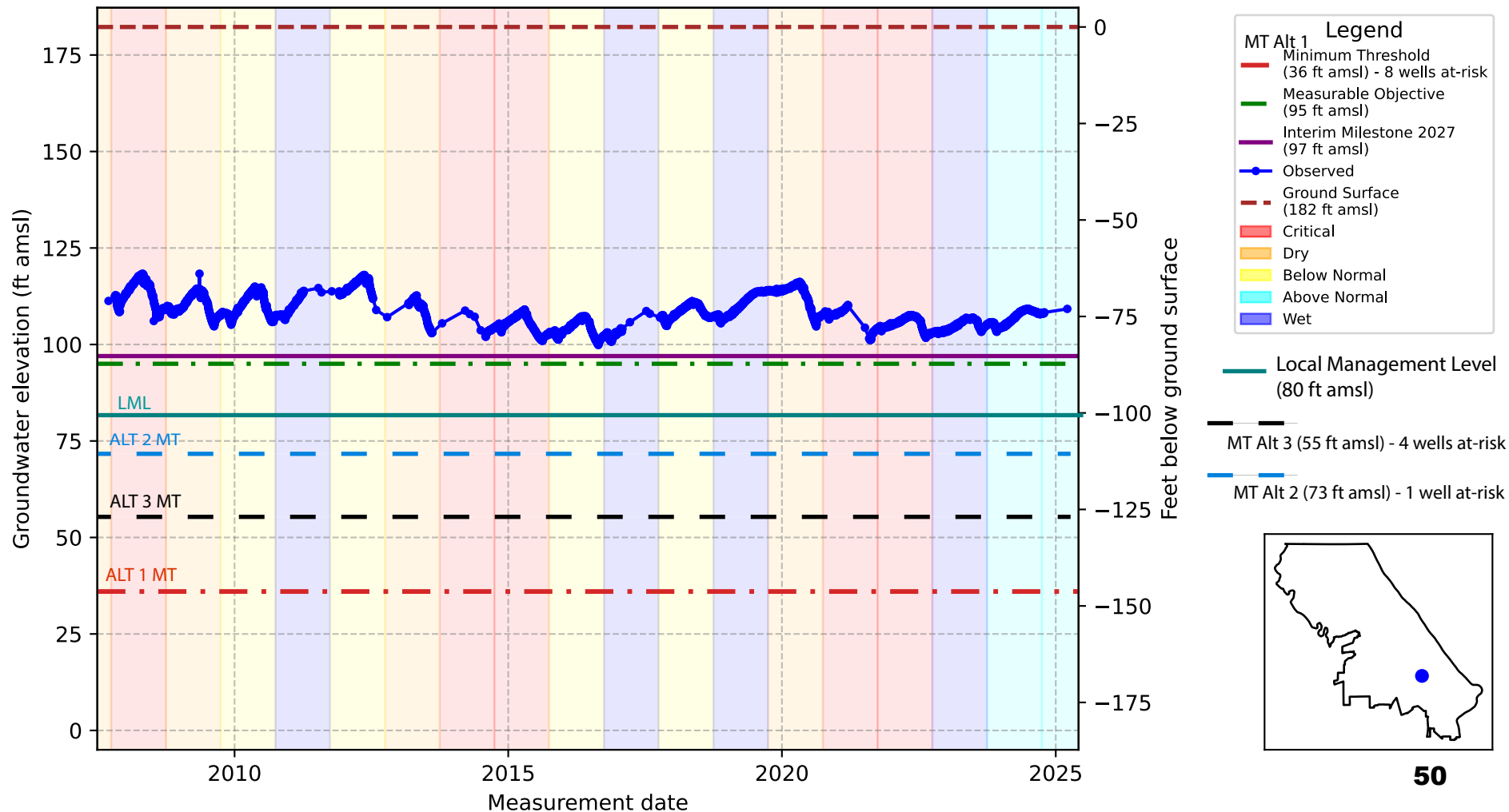
Vina Subbasin - State Well Number (SWN): 21N02E32E001M

Total Number of Domestic Wells = 110



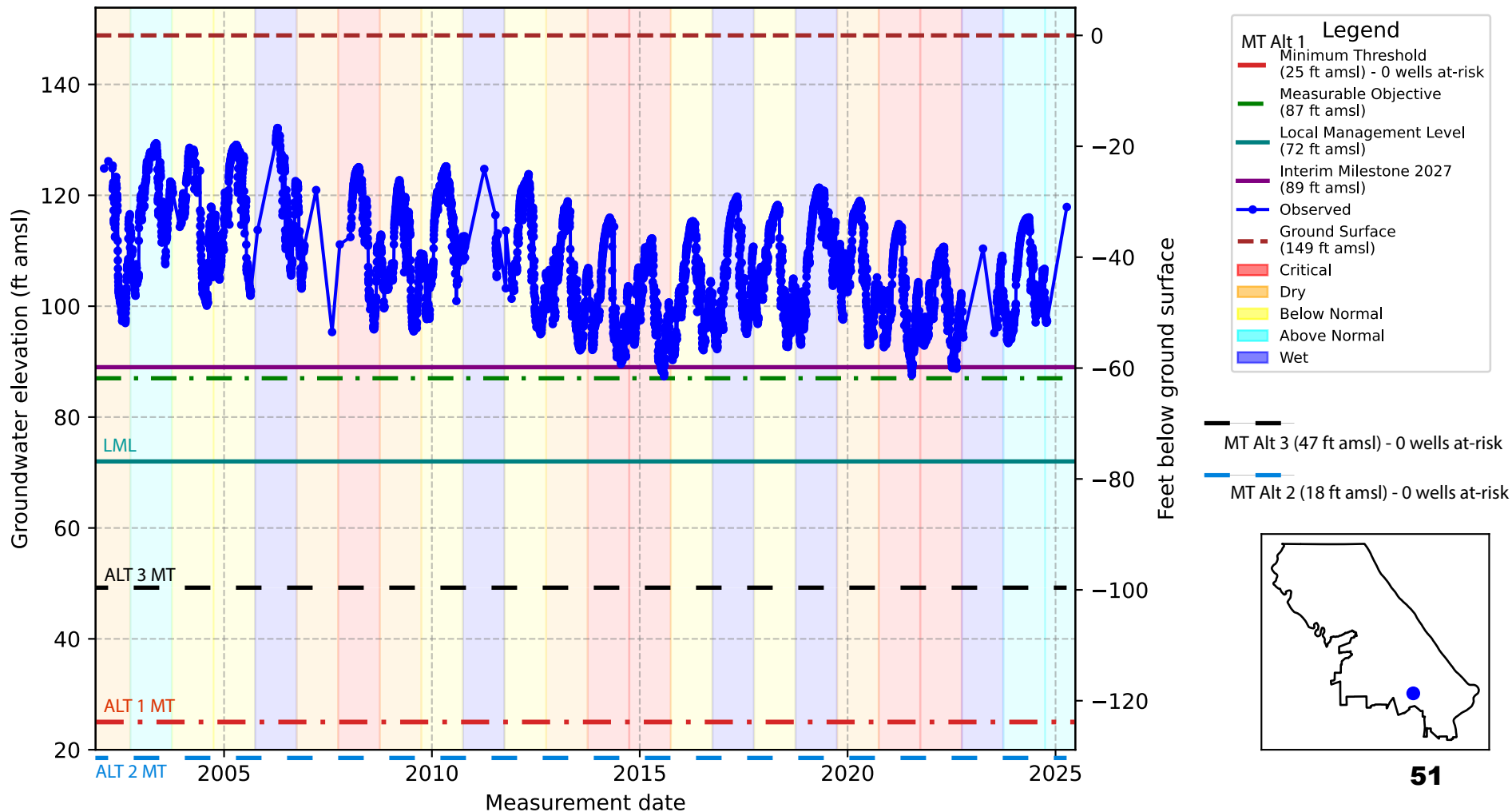
Vina Subbasin - State Well Number (SWN): 21N02E26E006M

Total Number of Domestic Wells = 20



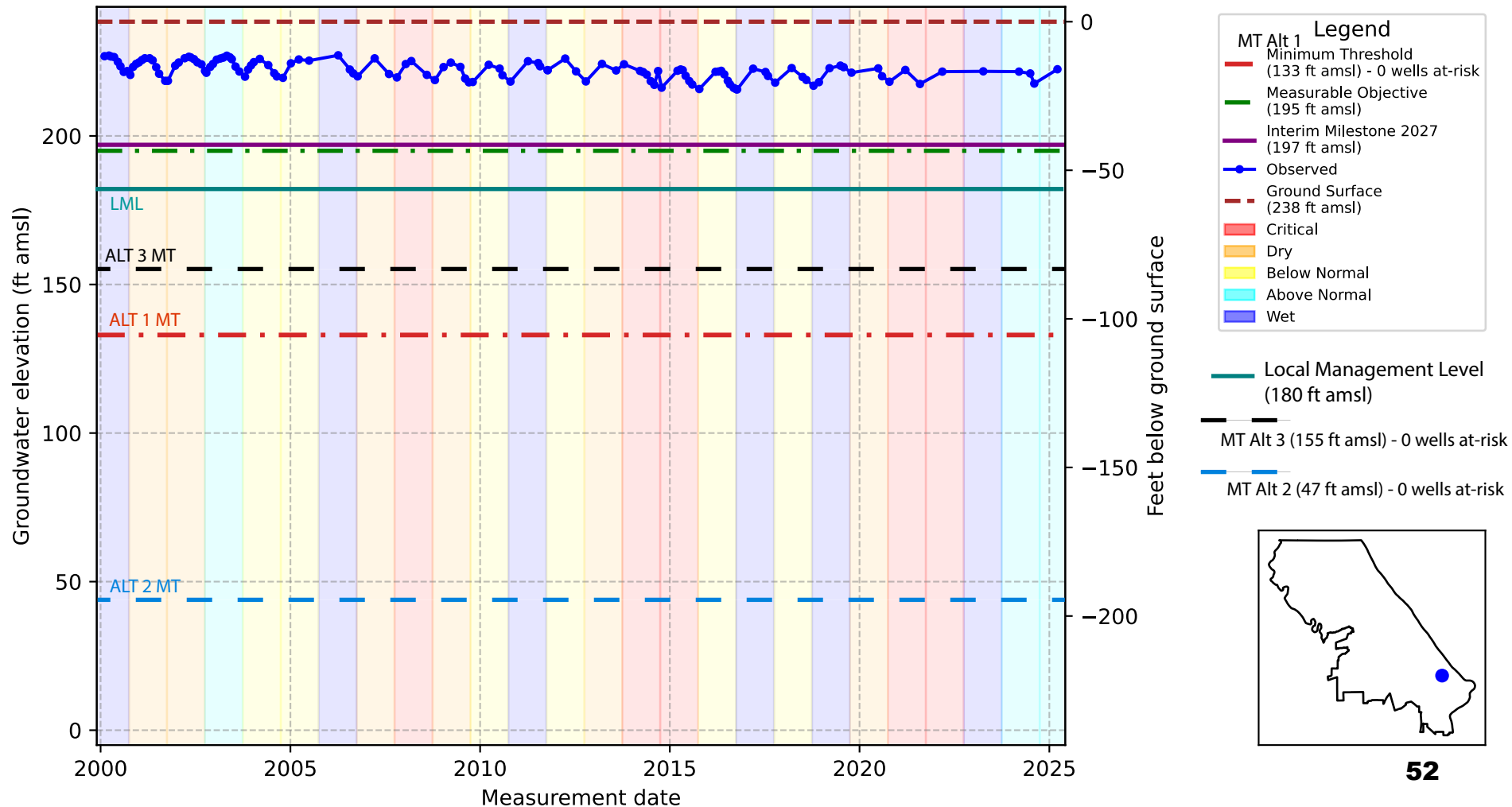
Vina Subbasin - State Well Number (SWN): 20N02E09G001M

Total Number of Domestic Wells = 2



Vina Subbasin - State Well Number (SWN): 21N03E32B001M

Total Number of Domestic Wells = 7



Vina Subbasin - State Well Number (SWN): 20N03E33L001M

Total Number of Domestic Wells = 2

