



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

**Rock Creek
Reclamation District**
P.O Box 1679
Oroville, CA 95965-1679
(530) 533-2855



Board Members:

Jeff Rohwer, Chair
Tod Kimmelshue, Vice Chair
Derek Sohnrey
Katie Hawley
Jim Graydon

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Bruce McGowan, Treasurer
James Strong
Hal Crain
Elvin Bentz
Dan Paiva
Jon Lavy

Vina Groundwater Sustainability Agency (GSA) and Rock Creek Reclamation District Groundwater Sustainability Agency (GSA) Joint Board Meeting Agenda

Date: Wednesday, August 12, 2026

Time: 3:30 PM

Location: Butte County Association of Governments & B-Line, Board Room,
326 Huss Dr. Suite 110, Chico, CA, 95928

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

Meeting ID: 530 680 7222

Live streaming and recording of Vina GSA Board 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.

PUBLIC COMMENT INFORMATION:

Public comment will be accepted in-person at the meeting or may be submitted by email prior to the meeting to VINAGSAPUBLICCOMMENTS@CHICOCA.GOV. If you would like to address the Board at this meeting, you are requested to complete a speaker card and hand it to the Board Clerk prior to the conclusion of the staff presentation for that item. A time limit of three (3) minutes per speaker on all items and an overall time limit of thirty minutes for agenda items has been established. If more than 10 speaker cards are submitted for agenda items, the time limitation may be reduced to one and a half minutes per speaker.

When submitting public comments via email, please indicate the item number your comment corresponds to in the subject line. Comments submitted will be sent to the full GSA Board members electronically prior to the start of the meeting. Email comments will be acknowledged and read into the record by name only during the public comment period for each agenda item. Emailed comments received prior to the end of the meeting will be made part of the written record but not acknowledged at the meeting.

VINA GSA AND ROCK CREEK RECLAMATION DISTRICT GSA
JOINT BOARD MEETING AGENDA

August 12, 2026

1. VINA GROUNDWATER SUSTAINABILITY AGENCY (GSA) BOARD MEETING

1.1. Call To Order

1.2. Roll Call

2. ROCK CREEK RECLAMATION DISTRICT (RCRD) GSA BOARD MEETING

2.1. Call to Order

2.2. Roll Call

3. BUSINESS FROM THE FLOOR

Members of the public may address the Vina GSA and RCRD GSA Boards at this time on any matter not already listed on the agenda; comments are limited to three minutes. The Boards cannot take any action at this meeting on requests made under this section of the agenda.

4. JOINT VINA GSA/RCRD GSA BOARD MEETING AGENDA

4.1. *Periodic Evaluation and Plan Amendments Timeline Update

Staff will provide an update on the status and anticipated timeline for the Groundwater Sustainability Plan (GSP) Periodic Evaluation and Plan Amendments, including key decision-making milestones through January 2027. The presentation will also highlight newly available supporting documents and technical resources prepared as part of the Periodic Evaluation process, along with an update on the status of the remaining Sustainable Groundwater Management (SGM) Grant projects. **(Verbal Report – Becky Anderson - Fairbanks, SGM Grant Projects Manager)**

Requested Action: Accept as information.

4.2. *Consideration of topics related to the Vina Periodic Evaluation and potential amendments to the Groundwater Sustainability Plan (GSP).

Staff will present an overview of each topic based on information provided in the attached transmittals and staff memos to support Board discussion and decision-making. The Board will provide feedback to staff or take action, as warranted. **(Report - Christina Buck, Asst. Director Butte County Water and Resource Conservation)**

4.2.1 *Consideration of draft response to water quality related Recommended Corrective Action for inclusion in the Periodic Evaluation

Staff will present an overview of the topic, including feedback provided by the Vina Stakeholder Advisory Committee (SHAC) at their July 22, 2026, meeting.

Requested Action: Staff requests direction from the two GSA Boards on the response to RCA 1 which will be included in the Periodic Evaluation.

4.2.2 *Consideration of potential new Projects and Management Actions (PMAs) for inclusion in the Periodic Evaluation

Staff will present an overview of the topic, including feedback provided by the Vina Stakeholder Advisory Committee (SHAC) at their July 22, 2026 meeting. The purpose of this agenda item is to introduce the concepts and receive early questions and feedback from the GSA Boards. Staff is not requesting action or direction at this meeting on whether any of the concepts should be added to the PMA list.

The Boards are encouraged to provide feedback on each concept's objective, proposed lead and participating entities, potential funding, relationship to existing PMAs, and relevance to groundwater sustainability. Feedback is also requested on whether the concepts are best characterized as projects or management actions and, for the project concepts, whether they would be part of the GSAs' active implementation strategy or more appropriately categorized as Other Projects. Staff will use this input to work with project proponents to refine the descriptions and proposed categorization for inclusion in the public review draft of the Periodic Evaluation. The potential PMAs will be presented to the SHAC for formal recommendation before being presented to the Vina GSA and Rock Creek Reclamation District GSA Boards for formal consideration, as warranted. Discussion at this stage does not commit the GSAs to implementation or funding.

Requested Action: Provide direction to staff on the new PMAs to be included in the public review draft of the Vina Periodic Evaluation.

4.2.3 *Consideration of plan amendments and Periodic Evaluation content for Sustainable Management Criteria (SMC), including removal of “non-dry year” language and the Groundwater Level SMC

Board consideration will include:

- a) Response to Recommended Corrective Actions (RCAs) 3 and 4 related to “non-dry year” language in the SMC. The Boards will consider a potential Groundwater Sustainability Plan (GSP) amendment to remove the “non-dry year” language from the SMC.
- b) Potential changes to the Groundwater Level SMC in the Periodic Evaluation or through plan amendments, including consideration of an expanded Representative Monitoring Site (RMS) network and Alternatives for the Minimum Threshold.

Two attached staff memos provide critical background and considerations for the topics listed above, as well as options for the Boards' consideration. These memos were provided to the Vina Stakeholder Advisory Committee (SHAC) at their July 22, 2026, meeting. Staff will present an overview of the topic, including feedback and recommendations provided by the SHAC on these topics.

Requested Action: Staff is seeking direction from the two GSA Boards regarding:

- a. How to respond to RCA 3 and 4 in the public review draft of the Periodic Evaluation and whether or not to amend the GSP to remove the non-dry year language in the SMC.
 - Amending the GSP to remove reference to non-dry year water year types would include changes to the SMC for Groundwater Levels, Groundwater Storage, Water Quality, and Interconnected Surface Water sustainability indicators (as shown in the staff memo).
 - Not removing the non-dry year language would require “discussing how extractions and recharge will be managed as necessary to ensure that reductions in groundwater levels or storage during dry years are offset by increases in groundwater levels or storage during other years within the sustainable management criteria for the chronic lowering of groundwater levels” in the Periodic Evaluation.
- b. Whether expansion of the RMS network to 29 wells should be included as an amendment to the GSP or simply described in the Periodic Evaluation
- c. What approach to use to assign Minimum Thresholds (MTs) to the RMS wells:
 - Alternative 1: Same or comparable 2022 GSP MTs, with addition of Local Management Levels on 14 out of 29 RMS wells
 - Alternative 2: Change MTs based on 20 feet below the historical low, or 5% of domestic wells at risk, whichever is deeper; no Local Management Levels
 - Other direction as specified by the Boards

4.3. *Drought Resilience Plan Update

On September 23, 2021, Governor Newsom signed into law SB 552 (Hertzberg), which assigned new responsibilities and requirements for the State of California (State) and local agencies to help small water suppliers and rural communities reduce their risks of inadequate water supply amid a water shortage event. SB 552 specifically required all counties to improve drought and water shortage preparedness for state small water systems and domestic wells within a county's jurisdiction by 1) establishing a standing Drought and Water Shortage Task Force (Drought Task Force) and 2) developing a County Drought Resilience Plan (DRP).

The existing Butte County Drought Preparedness and Mitigation Plan was adopted by the Board of Supervisors in October 2004 (2004 Drought Plan). However, that Plan needed to be updated to comply with SB 552 by incorporating the required drought and water shortage risk assessment, identifying short and long-term response actions that specifically address state small water systems and domestic wells, and other implementation considerations. In addition, the preparation of the County DRP would also reflect other current laws, programs, and activities being conducted by County departments and other local agencies (i.e., Groundwater Sustainability Agencies).

Butte County Department of Water and Resource Conservation has released a Draft Drought Resilience Plan for public review and comment through August 28, 2026. Department staff will present an overview of the DRP. *(Report – Kamie Loeser, Director, Butte County Water & Resource Conservation)*

Requested Action: Accept as information, provide comments as appropriate.

5. ADJOURNMENT:

The Vina GSA/RCD GSA Joint Board meeting will adjourn to the Vina GSA Meeting after tonight's Vina/RCD GSA Joint Board Meeting.

*****RECONVENE TO VINA GSA BOARD MEETING*****

1. VINA GROUNDWATER SUSTAINABILITY AGENCY (GSA) BOARD MEETING

1.1 Call To Order

1.2 Roll Call

2. BUSINESS FROM THE FLOOR

Members of the public may address the Vina GSA and RCD GSA Boards at this time on any matter not already listed on the agenda; comments are limited to three minutes. The Boards cannot take any action at this meeting on requests made under this section of the agenda.

3. CONSENT AGENDA:

3.1 *Approval of the 07-08-26 Vina GSA Board Meeting Minutes.

Requested Action: Approve the 07-08-26 Vina GSA Board meetings minutes.

3.2 *Approval of Memorandum of Understanding (MOU) for Financial Services Between the Vina Groundwater Sustainability Agency and the Butte County Auditor-Controller

This Memorandum of Understanding (MOU) establishes an agreement with the Butte County Auditor-Controller to provide financial and accounting services to the Vina Groundwater Sustainability Agency, including routine accounting and bookkeeping, year-end accrual entries, and support for the Agency's annual financial audit. The not-to-exceed annual fee is \$26,000. *(Report – Dillon McGregor, GSA Program Manager)*

Requested Action: Approve the Memorandum of Understanding for Financial Services with the Butte County Auditor-Controller and authorize the Board Chair to execute the agreement on behalf of the Agency.

4. ITEMS REMOVED FROM CONSENT – IF ANY

5. REGULAR AGENDA:

5.1 *Ongoing SGMA Implementation Support Services Request for Proposal (RFP) Update

Staff will provide an update on the RFP process for Ongoing SGMA Implementation Support Services. Interviews, if conducted, are anticipated for August 17, 2026. If the Board wishes to participate in the interview process, a Board member or ad hoc committee will need to be designated at this meeting. **(Report – Dillon McGregor, GSA Program Manager)**

Requested Action: Discuss potential Board participation in the interview process and, if desired, designate a Board member or ad hoc committee to participate.

5.2 *Board Meeting Start Time

At the July board meeting, the Board asked staff to bring back an item to reconsider the current 3:30 PM meeting start time. Meetings were previously held at 5:30 PM. Staff is seeking Board discussion on whether to keep the current time or move to a later start, such as 4:30 PM or 5:30 PM. **(Report – Dillon McGregor, GSA Program Manager)**

Requested Action: Discuss and provide direction to staff on the Board's preferred meeting start time.

6. COMMUNICATIONS AND REPORTS

6.1 Program Manager Report (Information Only - Dillon McGregor, GSA Program Manager)

- Possible Cancellation of August SHAC meeting

7. BOARD MEMBER REQUESTS FOR FUTURE ITEMS:

Board Members may propose topics, projects, or issues for inclusion on a future agenda. Proposals will be noted for consideration by the Chair and Program Manager, subject to feasibility and alignment with the Agency's priorities. No discussion or action will be taken on proposed items at this meeting.

8. ADJOURNMENT:

The Vina GSA Board meeting will adjourn to Closed Session after tonight's Vina GSA Board Meeting.

1. CLOSED SESSION PUBLIC COMMENTS OR BOARD DISQUALIFICATIONS:

Members of the public may address the Board at this time on the closed session item only; comments are limited to three (3) minutes, or time limit as determined by the Chair.

2. ADJOURN TO CLOSED SESSION:

3. CLOSED SESSION

3.1 Call to Order

4. CLOSED SESSION AGENDA

4.1 PURSUANT TO GOVERNMENT CODE SECTION 54956.9(d)(1) - CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION – Butte County Superior Court #23CV02789 - Ronald R Titus, as Trustee of the 2005 Titus Trust et al vs Vina Groundwater Sustainability Agency

- 4.2 PURSUANT TO GOVERNMENT CODE SECTION 54956.9(d)(1) - CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION – Butte County Superior Court #22CV00321 - AquAlliance et al vs Vina Groundwater Sustainability Agency et al.
- 4.3 PURSUANT TO GOVERNMENT CODE SECTION 54956.9(d)(1) - CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION – Butte County Superior Court #24CV04275 - AquAlliance et al vs Vina Groundwater Sustainability Agency et al.

5. **CLOSED SESSION ANNOUNCEMENT:**

Report on any action taken during the closed session.

6. **ADJOURNMENT:**

The Vina GSA Closed Session will adjourn to a Vina GSA Regular Board Meeting on September 9, 2026, at 3:30 p.m. at the Chico City Council Chamber Building at 421 Main Street, Chico, CA and online via Zoom for viewing only.

*Materials included in agenda packet

JOINT MTG AGENDA ITEM 4.1



Vina Groundwater Sustainability Agency Agenda Transmittal

Subject: Periodic Evaluation and Plan Amendments Timeline Update

Contact: Becky Fairbanks

Phone: (530) 552-3587

Meeting Date: August 12, 2026

Agenda Item: 4.1

Summary

Staff will provide an update on the status and anticipated timeline for the Groundwater Sustainability Plan (GSP) Periodic Evaluation and Plan Amendments, including key decision-making milestones through January 2027. The presentation will also highlight newly available supporting documents and technical resources prepared as part of the Periodic Evaluation process, along with an update on the status of the remaining Sustainable Groundwater Management (SGM) Grant projects.

Requested Board Action: Accept as information.



Update on the Status and Anticipated Timeline for the Vina GSP Periodic Evaluation and Plan Amendments

Vina and Rock Creek Reclamation District GSA Joint Board Meeting
August 12, 2026

1

1

Today's Agenda

01 PE & PA Status & Timeline

Overview of the Periodic Evaluation and Amendments process and key decision-making milestones through January 2027

02 PE & PA Supporting Documents

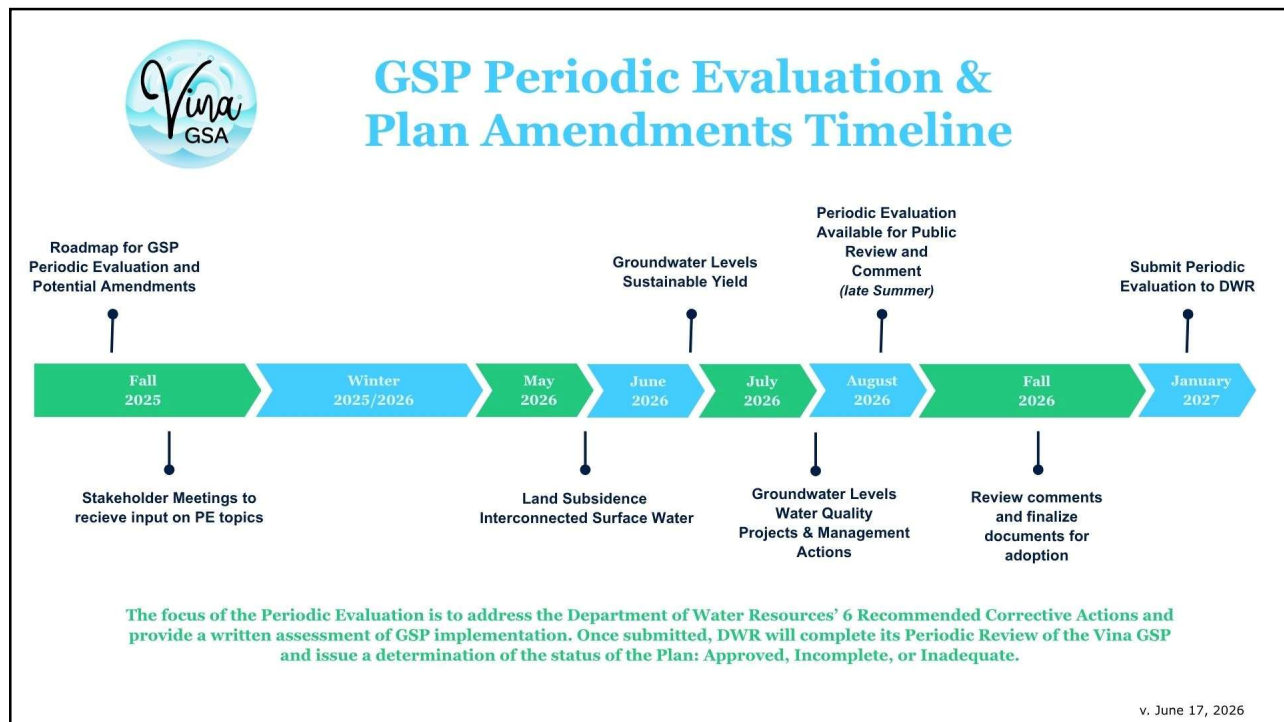
Access technical reports, new data, and materials posted to the PE Supporting Documents page

03 SGM Grant Project Updates

Status of remaining Sustainable Management Grant projects including well installations and recharge feasibility work

2

2



3

Public Meetings

Previous Meetings

- May 7 – Subsidence Discussion
- May 8 – Legal Implications of Recharge Webinar
- May 18 – GDE Discussion
- May 21 – ISWs Discussion
- June 15 – Groundwater Recharge Workshop
- July 14 – Groundwater Levels Workshop
- August 3 – Small Group GWL discussion

Upcoming Meetings

- September TBD – Draft PE & PA Workshop

4

PE & PA Supporting Documents

Newly Available Materials

The Data Gap project and Periodic Evaluation efforts are providing new information, data, analyses, and resources to inform current discussions.

► Highlighted New Documents:

The Nature Conservancy (TNC) – GDE Considerations for the Vina Subbasin

SGMA GDE considerations specific to the Vina Subbasin

Supplemental Hydrographs for 2027 RMS Network

Updated hydrographs supporting the proposed 2027 monitoring network

See webpage for all available materials and Table 1 summary →

MANAGING OUR GROUNDWATER
SGMA - SUSTAINABLE GROUNDWATER MGMT ACT
GSP - GROUNDWATER SUSTAINABILITY PLAN
GSP SUBMITTED TO DVR
GSP PERIODIC EVALUATION
SUPPORTING DOCUMENTS
GROUNDWATER MANAGEMENT 101
SGM GRANT PROJECTS
INTERACTIVE GROUNDWATER MAP FUNDING

Periodic Evaluation Supporting Documents

This page provides information related to the Periodic Evaluation, including new data, studies, and technical memos completed since the adoption of the GSP (see Table 1 and links below).

Newly Available Materials

The Data Gap project and Periodic Evaluation efforts are providing new information, data, analyses, and resources to inform current discussions. Check them out here!

- ④ Supplemental Hydrographs for 2027 RMS Network_v7.9.2026.pdf
- ④ ESA_Supplemental Materials_GDE Root Depth and Presentation Slides.pdf
- ④ The Nature Conservancy - SGMA GDE Considerations for the Vina Subbasin.pdf
- ④ Vina Groundwater Dependent Ecosystems Technical Memo
- ④ Vina Interconnected Surface Water Memo_Final Draft_5.5.2026 w Attach.pdf
- ④ LWA TM_Well Risk Assessment w Cover_4.22.2026.pdf

Table 1. Summary of New Information Since 2022 GSP Adoption

Significant New Information (e.g., new monitoring data, reports, coordination with other agencies, data provided by the Department)	Description	Relevant GSP Sections

5

Status of Remaining SGM Projects

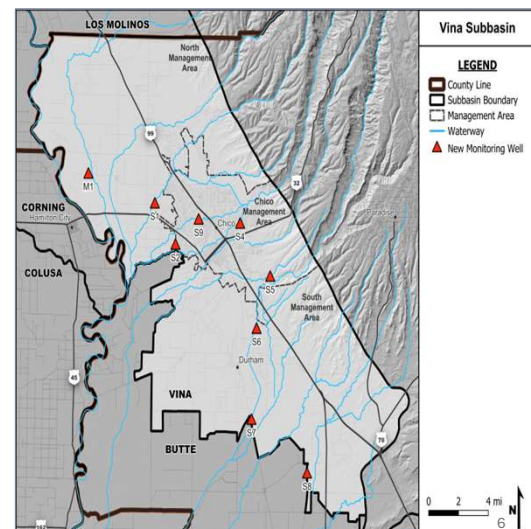
• Data Gap Identification and Data Improvement

- Currently drilling 6 of 9 shallow wells
- Multi-completion well installed
- Well completion reports and water sampling ongoing

• Legal Implications of Recharge

- May 8 – webinar completed
- SGM Recharge feasibility analyses currently under review
 - Lindo Channel
 - South Vina Extension Water Supply Project
 - Ridge to Valley Water Supply
 - Rock Creek & Keefer Slough
 - DMWC Pipeline
 - Comanche Creek

New Monitoring Wells – Vina Subbasin



6

Thank you



Vina Groundwater Sustainability Agency Agenda Transmittal

Subject: Consideration of topics related to the Vina Periodic Evaluation and potential amendments to the Groundwater Sustainability Plan (GSP)

Contact: Christina Buck

Phone: (530) 552-3593

Meeting Date: August 12, 2026

Agenda Item: 4.2

Summary:

At the July 22, 2026 meeting of the Vina Stakeholder Advisory Committee (SHAC), staff presented an overview of the following four topics for SHAC consideration and potential recommendation to the Vina GSA Board and/or feedback to staff:

- a. GSP Amendment to remove “non-dry year” language from SMC
- b. Groundwater Level Sustainable Management Criteria (SMC) including Alternatives for the Minimum Threshold
- c. Potential new Projects and Management Actions
- d. Draft response to Water Quality related Recommended Corrective Action

The SHAC meeting packet included a staff memo on each topic to support SHAC discussion and recommendations. The same staff memos are provided to the GSA Boards for each of these topics for agenda items 4.2.1, 4.2.2 and 4.2.3 (note, the order of topics on the agenda is different from the SHAC agenda). Staff will present an overview of each topic as a separate agenda item, including a description of SHAC feedback and their recommendations as described in the attached staff memo.

Attachments:

1. Staff Memo – Summary of SHAC Discussion and Recommendations on the Vina GSP Periodic Evaluation and Potential Plan Amendments from July 22, 2026 Meeting
2. Slides for items 4.2.1, 4.2.2 and 4.2.3



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

MEMORANDUM

To: Vina Groundwater Sustainability Agency (GSA) Board and Rock Creek Reclamation District GSA Board

From: Christina Buck, Asst. Director, Butte County Dept. of Water and Resource Conservation (technical staff support to the GSA); Laura Foglia, Larry Walker Associates

Date: August 5, 2026

Subject: **Summary of Stakeholder Advisory Committee (SHAC) Discussion and Recommendations on the Vina Groundwater Sustainability Plan Periodic Evaluation and Potential Plan Amendments from the July 22, 2026 Meeting**

Background

On July 22, 2026, the Vina Groundwater Sustainability Agency (GSA) Stakeholder Advisory Committee (SHAC) held its regular meeting at the Chico City Council Conference room. Seven of the nine committee members were present — Samantha Lewis, Holly Swan, Joanne Parsley, Anne Dawson, Susan Schrader, Patrick Riley, and Todd Greene; Greg Sohnrey and Evan Markey were absent. Bruce McGowan participated as the RCRD representative, whose position as an ex-officio member (i.e. non-voting) is recorded separately on each action.



The principal agenda item was “*Consideration and potential recommendation on topics related to the Vina Periodic Evaluation and potential amendments to the Groundwater Sustainability Plan (GSP).*” Staff presented four topics for SHAC discussion and their potential recommendation:

- (a) a GSP amendment to remove “non-dry year” language from the Sustainable Management Criteria (SMC);
- (b) the Groundwater Level SMC, including alternatives for the Minimum Threshold (MT);
- (c) potential new Projects and Management Actions (PMAs); and
- (d) a draft response to the water-quality-related Recommended Corrective Action (RCA).

The SHAC took formal action (motions) on topics (a) and (b) and provided informal feedback to staff on topics (c) and (d). This memo summarizes the committee’s discussion — noting where members found common ground and where specific concerns were raised — and presents the committee’s recommendations, including the majority and minority positions on the two items that included a vote.

SHAC Discussion Summary

(a) Removal of “Non-Dry Year” Language from the SMC

Discussion centered on whether to remove references to “non-dry” years from the undesirable result definition framework. Members broadly recognized that the GSA must be able to manage the subbasin in both dry and non-dry years, and that removing the language would be responsive to Department of Water Resources’ (DWR) feedback. Members noted that retaining the language would require a convincing justification to DWR. Staff observed that if groundwater has already declined to the minimum thresholds, the basin is effectively failing to be managed sustainably regardless of whether the year is wet or dry. Todd Greene emphasized that, because the MTs are set so low, it is not known whether the basin would recover from a multi-year drought that drew levels down to the MTs. This would be unprecedented territory that the subbasin should aim to avoid.

The principal concern raised in favor of retaining the language was legal. Samantha Lewis noted that removal could conflict with Water Code section 10721, which allows for overdraft during drought periods, and suggested that legal counsel weigh in before removing language that was originally included to keep the GSP compliant with the law. Members also discussed that the practical problem arises in the two “consecutive” non-dry years, and observed that removing “consecutive” would be functionally similar to removing the “non-dry” reference altogether.

(b) Groundwater Level SMC and Minimum Threshold Alternatives

Staff presented two alternatives for the Groundwater Level SMC. The discussion compared the two alternatives described in the staff memos and included a discussion of a combined approach that emerged during the meeting:

- **Alternative 1** — retain the existing 2022 GSP minimum thresholds largely unchanged and add non-regulatory Local Management Levels (LMLs) set 15 feet below the Measurable Objective (MO) for 14 (out of 29) Representative Monitoring Site (RMS) wells, functioning as an early-warning trigger for Board discussion long before the regulatory MT is reached (approximately 266 domestic wells at risk).
- **Alternative 2** — revise the MTs using a new methodology (20 feet below the historical low, or the level at which 5% of domestic wells would be at risk, whichever is deeper), raising the MTs in most polygons — though in a few low-well-count polygons the resulting MT is set below 2022 MT levels; no LMLs (approximately 95 domestic wells at risk).
- **Combined “Option 3” (proposed in SHAC discussion)** — raise the MTs as in Alternative 2 while also adding LMLs as in Alternative 1, but LMLs could be set at 20 feet from the MO. Several members were interested in exploring this further, but ultimately agreed that more time and information would be needed.

Common ground: members broadly agreed that the number of domestic wells at risk is a meaningful consideration — the difference between an estimated 266 and 95 wells was seen as significant. Members confirmed with staff that the domestic well mitigation program will proceed regardless of which alternative is selected. Members also shared an understanding that the MTs could be amended in the future.

Concerns raised: several members felt the LML approach was not prescriptive enough and asked for language specifying what would actually occur when an LML is reached, rather than the non-committal language that the Board “could” discuss and consider action. Questions were raised about the fiscal implications of additional monitoring and projects, how “persistently

reaching” an LML is defined, and whether a trigger could rest on a single summer measurement. Members and a local farmer also raised data and process questions — how the 15-foot buffer was selected (described as a middle ground between 10 and 20 feet, with discussion of whether 20 feet would be more appropriate), the basis for the well-head elevation assumptions and domestic-well counts, and requests for direct links to the supplemental hydrographs available on the Vina GSA supporting documents webpage.

(c) Projects and Management Actions (PMAs)

Staff introduced new PMA concepts as an informational item; no formal action was requested. The committee expressed general support for the concepts. Several members preferred that the concepts be categorized as “other projects” rather than as “management actions.” Members also asked for clarification on the specific feedback staff were seeking and, for the Chico Urban Forest concept, whether the shallow wells to be designated already exist or would need to be drilled.

(d) Draft Water Quality RCA Response

The committee expressed general support for the draft water quality RCA response in the staff report. Members recommended that domestic well owners be provided information on where contaminant plumes are located. Staff explained that Geosyntec included a map of the plumes in the final recharge feasibility report and that those maps will be referenced in the Periodic Evaluation.

Summary of Public Comment

Public comment on this agenda item was heard from Greg Brislain, Tovey Giezentanner, Patrizia Hironymous, and Cheetah Tchudi. (Jim Graydon and Tovey Giezentanner also commented under Business from the Floor, and Cheetah Tchudi commented on the Periodic Evaluation timeline update.) Key themes included:

- **Process and the “strawman” proposal** — Greg Brislain explained that the strawman is an initial draft meant to jump-start discussion (the first was shared June 18), suggested beginning the process earlier in future cycles, and noted the strawman calls for input from environmental groups (with thanks to Audubon for participating).
- **Managing a recovering basin (Tovey Giezentanner)** — the Vina Subbasin recovers, unlike many other subbasins statewide, and the SHAC should consider how to manage a basin that behaves differently from the norm; questioned how removing the non-dry-year language addresses the Water Code, which seems to contradict the argument for removal; and noted that although LMLs could become a de facto regulatory approach, they become a useful framework for managing the basin rather than focusing only on where to set a line (i.e. MTs). Tovey had provided a four page handout to the SHAC members and public under Business from the Floor that outlined AGUBC position on the four topics under consideration by the SHAC (See attachment A).
- **A higher threshold and an integrated approach** — other commenters voiced support for the combined “Option 3” that SHAC members had raised during discussion (raising MTs, establishing LMLs, and incorporating ecological thresholds), called for mapping all contaminant plumes; and argued there is nothing wrong with holding the basin to a higher standard, including small agricultural wells (not only domestic wells) in the assessment, considering wells that pre-date 1980, and noting that nothing is lost by removing the non-dry-year language.

SHAC Recommendations

Recommendation on Topic (a): Remove the “Non-Dry Year” Language

The SHAC recommends removing the “non-dry year” language from the SMC.

A motion to recommend leaving the non-dry-year language in the SMC (Parsley / Lewis) failed, 2–5. A subsequent motion to recommend removing the language (Swan / Greene) passed, 6–1:

- Ayes (6): Holly Swan, Joanne Parsley, Anne Dawson, Susan Schrader, Patrick Riley, and Todd Greene.
- No (1): Samantha Lewis.
- Absent: Greg Sohnrey and Evan Markey.
- RCRD representative position: No (opposed removal).

Majority position (6 members). Remove the language — primarily as a change responsive to DWR feedback and reflecting the view that the basin must be managed to avoid undesirable results in both dry and non-dry years, and that once the basin is at the MTs it is failing regardless of water-year type.

Minority position (1 member — Samantha Lewis). Retain the language, out of concern that removal could conflict with Water Code section 10721 and that the language was originally included for legal compliance; the minority favored obtaining legal counsel’s review before removal.

The RCRD representative’s advisory position also opposed removal.

Recommendation on Topic (b): Adopt Alternative 2 for the Groundwater Level SMC

The SHAC recommends Alternative 2.

A motion to recommend Alternative 1 (Parsley / Lewis) failed, 2–5. A subsequent motion to recommend Alternative 2 (Greene / Schrader) passed, 5–2:

- Ayes (5): Holly Swan, Joanne Parsley, Anne Dawson, Susan Schrader, and Todd Greene.
- Noes (2): Samantha Lewis and Patrick Riley.
- Absent: Greg Sohnrey and Evan Markey.
- RCRD representative position: No.

Majority position (5 members). Recommend Alternative 2 — revising the MTs upward under the new methodology, which substantially reduces the number of domestic wells at risk (from an estimated 266 to 95, per figures cited in discussion) and responds to public concern about the low 2022 MTs. Some majority members (including Todd Greene) expressed a preference for eventually pursuing the combined “Option 3” (Alternative 2 plus LMLs) and comfort with setting LMLs 20 feet below the historical low, but supported Alternative 2 as the recommendation to the Vina GSA Board with the reason that raising the MTs was more important than establishing LMLs.

Minority position (2 members — Samantha Lewis and Patrick Riley). Did not support Alternative 2. The earlier failed motion reflected support among some members (including Ms. Lewis) for Alternative 1, which would retain the 2022 MTs and add LMLs.

The RCRD representative’s advisory position also opposed Alternative 2.

Note: The action item as noticed also asked whether the change should be made as a GSP

amendment or described only in the Periodic Evaluation. The recorded motions addressed the selection of the alternative (Alternative 2); the SHAC discussion or recommendation did not directly address resolving the amendment-versus-Periodic-Evaluation question.

Feedback on Topics (c) and (d)

Both items were informational, and the committee provided feedback rather than formal recommendations. On PMAs (c), SHAC members expressed general support for the concepts, with several members preferring that they be categorized as “other projects” rather than “management actions.” On the water quality RCA response (d), the SHAC expressed general support for the draft response and commented that domestic well owners be given information on the locations of contaminant plumes.

Summary of SHAC Actions

Topic	SHAC Recommendation / Feedback	Committee Vote	RCRD Position
(a) Non-dry year language	Remove the non-dry-year language from the SMC	6–1 (passed)	No
(b) Groundwater Level SMC	Adopt Alternative 2 (revise MTs upward)	5–2 (passed)	No
(c) Projects & Management Actions	General support; prefer “other projects” categorization (feedback)	No vote	—
(d) Water Quality RCA response	General support; share plume-location info with well owners (feedback)	No vote	—

Requested Action

Receive this report and consider the SHAC’s recommendations as the Boards deliberate on the content for the Periodic Evaluation and potential amendments to the Groundwater Sustainability Plan.

Attachments

A. Handout provided to the SHAC members by Tovey Giezentanner as public comment on July 22, 2026

RCA 3a Offers Two Paths — Vina Qualifies for the Second

- **The RCA is a fork, not a command.** DWR says: remove the condition — **OR** — “discuss how extractions and recharge will be managed” so dry-year declines are offset in other years.
- **The second path is current law.** DWR's letter quotes Water Code § 10721(x)(1) verbatim: drought overdraft is not chronic lowering where the basin is managed to offset it.
- **Corning experiences drought but doesn't recover.** DWR found its Plan inadequate and removal of the non-dry year clause made sense for that subbasin. **Vina, however, has in most cases recovered from every drought on record** and holds an approved plan.
- **Recommended Approach:** We should leave the non-dry year clause, but narrow it as suggested in the proposed draft below; then explain in the PE how Vina has managed the basin to ensure that reductions are offset by increases.

DWR RCA 3a — the actual ask: “Revise the definition ... to **remove the non-dry year condition** **OR** discuss how extractions and recharge will be managed ... to ensure that reductions ... during dry years are offset by increases ... during other years.”

PATH 1 — REMOVE

Built for a basin that is not recovering.

Corning:

- No significant recovery after its droughts
- GSP found inadequate (Oct 2023)
- Removed the clause on resubmittal

Removal fit that record.

PATH 2 — DOCUMENT ✓ VINA

Built for a basin that recovers.

- Recovered after every drought on record — five since 1976
- WY 2025: avg 20 ft above MOs · 71 ft above MTs
- No MT reading breached in ~80 years of record
- GSP approved with the clause in it (2023)

PE documents the § 10721(x)(1) demonstration.

PROPOSED DRAFT — REVISED DEFINITION (edits to 2022 GSP, pp. 145–146)

“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. Lowering during dry and/or critically dry year types is not considered significant and unreasonable — and is not an undesirable result — only if groundwater levels rebound above the MT within the first two consecutive non-dry years following those dry and/or critically dry years. If levels do not so rebound, those exceedances count toward the undesirable result like any other measurement.”

“Overdraft during a period of drought is not sufficient to establish a chronic lowering of groundwater levels if extractions and recharge are managed ... to ensure that reductions ... during a period of drought are offset by increases ... during other periods.”

— Water Code § 10721(x)(1), quoted in DWR's own determination letter

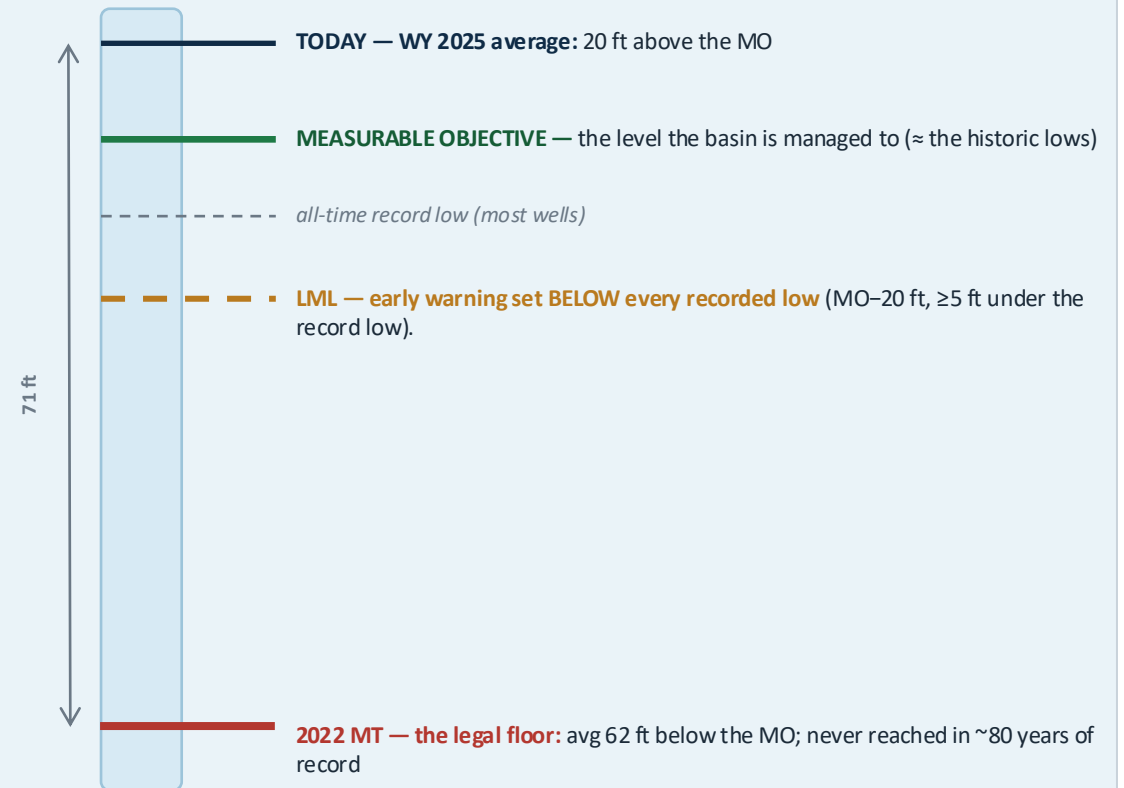
ITEM B · GROUNDWATER LEVEL MINIMUM THRESHOLDS

Alternative 1: Expand the Network, and add 14 LMLs at 20' below MO

- **The basin is managed at the MO, not the MT.** WY 2025 levels average 20 ft above the MOs and 71 ft above the MTs (Vina WY 2025 Annual Report).
- **Alternative 1 establishes Local Management Levels (LML)** in 14 polygons just below historic lows – essentially an early warning system for the subbasin. Setting the LMLs at 20' below MO (and not 15') ensures persistently reaching an LML means genuinely new territory for the subbasin – it's signal, not noise, and deserves our attention.
- **Alternative 2 moves a floor nobody operates at and actually lowers MTs at 8 of 29 wells** — mostly low-domestic-well-count polygons, including GDE and boundary areas.
- **Does Alternative 2 protect Domestic Wells? No.** No MT would have kept the ~30-40 wells that went dry in 2020–22 wet — they went dry at levels far above Alternative 1 or Alternative 2 levels. **What protects Subbasin domestic wells is a funded Mitigation Program** (FY 26–27 budget; development starts 2027) plus an early warning system (i.e., LMLs) — not a moved MT line.
- **Does Alternative 2 protect Groundwater Dependent Ecosystems? No.** In ~80 years, no RMS well reading has breached an MT — at the deeper 2022 levels or under Alternative 2's raised values.
- **Alternative 2 bottom line:** Raising MTs sounds protective, but it isn't in this subbasin because Vina consistently recovers from drought. It adds no protection the record can identify, while narrowing the margins the subbasin operates on in a drought.

Where the lines sit — and what each one does

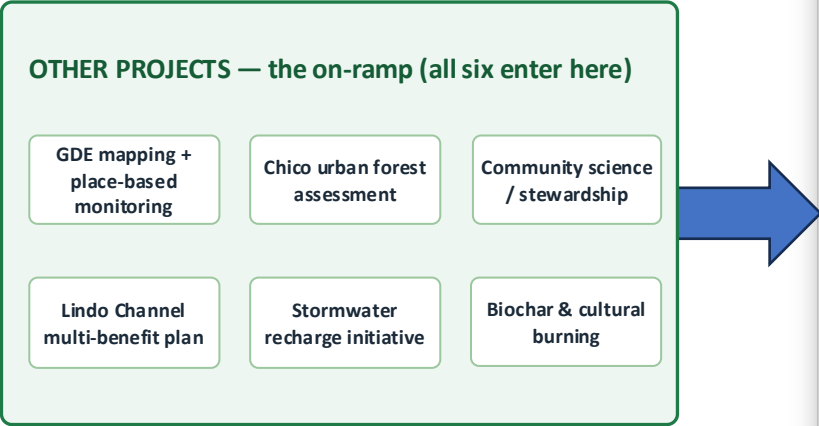
basin averages · illustrative, not to scale



ITEM C · PROJECTS & MANAGEMENT ACTIONS

Welcome All Six, as “Other Projects” – the GSP's On-Ramp

- **Say yes to all six.** Each concept meets a need — GDE data gaps, RCA 3's environmental analysis, monitoring confidence, Lindo recharge — and brings funding paths (URCTA, Prop 4, CAL FIRE) the GSAs cannot reach alone.
- **“Management Action” (MA) is a statement of authority and commitment.** Every existing MA is an exercise of government power and something the GSAs or member agencies control — ordinances, General Plan updates, allocation — with legal authority, triggers, timetables, costs, and funding.
- **New Conceptual Projects.** The new concepts are proponent-led, with anticipated — not committed — funding. Listing them as GSA commitments before Board review creates PE exposure: DWR grading the GSAs on work they neither fund nor lead.
- **Other Projects is the on-ramp, not a demotion.**



In-Progress Projects	Potential Projects
1. Agricultural Irrigation Efficiency (5.2.3.1) 2. Residential Conservation (Cal Water) (5.2.3.2) 3. Scoping for Flood MAR/Surface Water Supply and Recharge (5.2.3.3) 4. Rangeland Management and Water Retention (BCCER) (5.2.4.6)	5. Extend Orchard Replacement (5.2.5.1) 6. Agricultural Surface Water Supplies Project (5.2.4.2) 7. Surface Water Supply and Recharge (includes Lindo Channel)* (5.2.4.8)
* The Surface Water Supply and Recharge PMA is a broad project description that includes several possible activities involving use of surface water in the subbasin, with Sand Creek and Lindo Channel identified as examples.	
Other Projects	
1. Wastewater Recycling (City of Chico) (5.2.4.5) 2. Paradise Irrigation District Intertie (5.2.4.1) 3. Community Water Education Initiative (5.2.3.4) 4. Fuel Management for Watershed Health (5.2.3.5) 5. Removal of Invasive Species (5.2.4.7) 6. Streamflow Augmentation (5.2.4.3) 7. Recharge from the Miocene Canal (5.2.5.2) 8. Community Monitoring Program (CSUC) (5.2.4.4)	
Management Actions	
1. General Plan Updates (County and City) 2. Domestic Well Mitigation 3. Well Permitting Ordinance 4. Landscape Ordinance 5. Prohibition of Groundwater Use for Ski (Recreational) Lakes 6. Expansion of Water Purveyors' Service Area 7. Groundwater Allocation	

ITEM D · WATER QUALITY — RCA 1 RESPONSE

Support Staff’s Position

- **The right role.** The GSAs supplement — they do not supplant — the Regional Water Board, DTSC, EPA, and the coalition programs that regulate water quality. The draft holds that line.
- **The record is current.** The plume review found no significant changes since 2022 (GSP Fig. 2-18 sources); specific-conductance trends show no pumping-driven degradation this evaluation period; the recharge feasibility study already flags plumes near proposed projects.
- **The forward commitments are already in the draft.** Nitrate and PFOA/PFOS evaluation per State Water Board recommendations; continued CV-SALTS, SVWQC, and County trend-program coordination; a water-quality monitoring plan when recharge projects are built.
- **This item is the model working.** Coordinate, monitor, document — exactly what RCA 1 asked for. Documented in PE Section 6.4.

RCA 1, answered

a	DWR asked: Map plumes, constituents, remediation	GSP Fig. 2-18 review updated — no significant changes since 2022; recharge study flags plumes near proposed projects	✓
b	DWR asked: Could GSA pumping or recharge move plumes?	Conductance trend analysis: no pumping-driven change this period; monitoring plan committed as projects are built	✓
c	DWR asked: Impacts to supply & beneficial uses; mitigation programs	Point sources under RWQCB / DTSC / EPA; coalition & County programs track conditions; nitrate + PFOA/PFOS evaluation committed	✓
d	DWR asked: Coordinate with lead agencies; update the Plan	CV-SALTS, SVWQC, and County trend-program engagement documented in PE § 6.4	✓

Recommended Actions at a Glance

Item	Staff proposal	Recommended action
A — Non-dry year language	Remove the condition from the SMC for all four indicators; document in the PE.	Keep the principle, bounded. Amend to a strict recovery test — levels recover above the MT within the first two non-dry years after the drought, or the exceedance counts — and document the § 10721(x)(1) offset demonstration in the PE (RCA 3a's second path).
B — GWL Minimum Thresholds	Recommend Alternative 1 (2022 MTs + LMLs at 15 ft below MO) or Alternative 2 (revised MTs).	Alternative 1, with the LML buffer set deeper. 2022 MTs across the 29-well network. LMLs at the 14 polygons — non-regulatory and investigation-first, as staff proposed — set at 20 ft below the MO with a floor ≥5 ft below each well's historic low, so every trip means genuinely new territory and prompts the responses in staff's memo: monitoring, investigation, or Board consideration of activating an existing project.
C — New projects & management actions	Early feedback on four concepts + two related; two proposed as Management Actions.	Welcome all six — as Other Projects. Support every concept and its funding pursuit (URCTA, Prop 4, CAL FIRE); categorize as Other Projects now, and promote as defined scope, committed funding, and Board adoption land.
D — Water quality RCA response	Feedback on draft responses to RCA 1a–d.	Support as drafted. The responses answer RCA 1 on its own terms; no edits requested and no plan amendment needed.



Item 4.2.
Consideration of topics related to the
Vina Periodic Evaluation and potential
amendments to the Groundwater
Sustainability Plan

Joint GSA Board Meeting
 August 12, 2026

Presentation by: Christina Buck, Ph.D.
 Assistant Director, Butte County
 Dept. of Water and Resource Conservation
 [Providing technical staff support to the Vina GSA]

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Today: Three related agenda items

- 4.2.1** **Water Quality RCA Response** — Draft reply to DWR's water-quality Corrective Action
- 4.2.2** **Projects & Management Actions** — New concepts introduced for early feedback.
- 4.2.3** **Non-Dry Year Language** — Remove a qualifier DWR flagged in its Corrective Actions.
- Groundwater Level Thresholds** — Two alternatives for the Minimum Threshold

2

SHAC Discussion Highlights

Key themes and concerns raised by the Stakeholder Advisory Committee (SHAC) on July 22

- A Non-Dry Year Language** — Broad support for managing the basin in both dry and non-dry years. Recommended removing (6-1). Main concern with removal: Water Code §10721, which allows overdraft during declared drought, may conflict with removing the language — legal counsel review requested.
- B Groundwater Level Thresholds** — Alternative 1 (2-5 vote) vs. Alternative 2 (5-2 vote, recommended); a combined “Option 3” was discussed but not voted on due to timing and need for more information. Members also felt the LML trigger language wasn't prescriptive enough.
- C Projects & Management Actions** — General support for the concepts introduced; several members preferred “other projects” over staff's proposed “projects” or “management actions” categorization.
- D Water Quality RCA Response** — General support for the draft response; recommended sharing plume-location info with domestic well owners.

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SHAC Recommendations

SHAC's recommendations and feedback from its July 22 meeting, for the Boards' consideration

- A Non-Dry Year Language** — SHAC recommends removing the language (6–1 vote).
- B Groundwater Level Thresholds** — SHAC recommends Alternative 2 (5–2 vote)
- C Projects & Management Actions** — General support for the concepts proposed (feedback only, no vote).
- D Water Quality RCA Response** — General support; suggested sharing plume locations with domestic well owners (feedback only, no vote).

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ITEM 4.2.1

Water Quality — Corrective Action Response

Draft Response to DWR Recommended Corrective Action 1



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Water Quality: What DWR Asked (RCA 1)

ITEM 4.2.1

Key message: The GSA's role is to supplement — not replace — the agencies that regulate water quality. Existing programs addressing water-quality issues continue (e.g., the Chico Nitrate program).

DWR asked the GSAs to:

- a** Map contamination plumes and monitored constituents, and describe ongoing remediation.
- b** Evaluate whether GSA pumping or recharge could move contaminant plumes.
- c** Investigate impacts to supply & beneficial uses, and note any mitigation programs.
- d** Coordinate with lead remediation agencies and update the Plan accordingly.

6

Draft Response: Coordinate, Monitor, Document

ITEM 4.2.1

- Plumes are already mapped in the GSP (Figure 2-18), reviewed against water quality agency (SWRCB, DTSC, and EPA) sources — no significant changes since 2022. The recharge feasibility study flagged known plumes near proposed projects.
- Trend analysis of specific conductance shows no significant impacts from pumping this evaluation period.
- Planned recharge projects may dilute and limit plume movement; a water-quality monitoring plan would be expected if/when projects are built.
- Continued coordination with the Regional Water Board, DTSC, EPA, CV-SALTS, and the Sacramento Valley Water Quality Coalition — tracking nitrate and PFOA/PFOS.



Documented in the PE

Section 6.4

No plan amendment

proposed for this RCA

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SHAC Feedback

ITEM 4.2.1

- SHAC expressed general support for the draft water-quality RCA response.
- SHAC members noted that domestic well owners should be given information on the locations of contaminant plumes.

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Requested GSA Board Action

ITEM 4.2.1

Staff requests direction from the two GSA Boards on the response to Recommended Corrective Action 1 which will be included in the Periodic Evaluation.

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ITEM 4.2.2

Projects & Management Actions

Consideration of potential new Projects and Management Actions (PMAs) for inclusion in the Periodic Evaluation

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Where Things Stand: Existing PMAs

ITEM 4.2.2

*From the framework presented to SHAC in March — provided as context for the new concepts.
Goal: accurately document status of projects and track as appropriate.*



PMAs — active strategy

Tracked in DWR's PMA Module as Completed, In-Progress, or Potential. Four in-progress projects (e.g., irrigation efficiency, residential conservation, recharge/water supply scoping, rangeland management). Three potential projects (extend orchard replacement, ag surface water supplies, surface water supply and recharge including Lindo Channel)



Other Projects

Led mainly by other entities with ancillary groundwater benefit. Eight projects (e.g., wastewater recycling, PID intertie, streamflow augmentation). Documented in the PE; tracked as feasible.



Management Actions

Seven actions reported on annually — e.g., Domestic Well Mitigation, well permitting ordinance, landscape ordinance, and groundwater allocation.

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New Management Actions

ITEM 4.2.2

MONITORING & ASSESSMENT · INTRODUCED FOR FEEDBACK ONLY

Local Refinement of GDE Mapping *Provided by Audubon*

- Develop and begin implementing a place-based monitoring plan for priority GDEs building from shallow-groundwater monitoring wells identified by Vina GSA
- Refine GDE maps — capturing oak woodlands and urban canopy the state data misses.
- Establish baseline ecological conditions, field + NDVI vegetation-health indicators, and help identify groundwater-driven impacts to GDEs
- Define potential timing or response triggers tied to LMLs and ecological thresholds
- Integrates best available science (incl. Traditional Ecological Knowledge); volunteers, schools & partners add ground-truthing.

Chico Urban Forest Vulnerability Assessment *Provided by Audubon in coordination with City of Chico*

- Fills a data gap on how dependent Chico's unirrigated, deep-rooted trees are on groundwater vs. soil moisture/creek recharge — helping address DWR Corrective Action 3 for environmental users.
- Two-Tiered Vulnerability Assessment- Tier 1: satellite z-NDVI greenness screening (Rohde et al. method); Tier 2: City tree inventory + field checks near shallow, GDE-sensitive RMS wells.
- Baseline begins now; formal evaluation only if a Chico-area/GDE well reaches its LML.
- Partners: City of Chico Urban Forestry, County, possibly CSU Chico.

Related concept under discussion: a Community Science / watershed stewardship program (CA Urban Streams Alliance) — possibly standalone or part of the GDE mapping effort.

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New Projects

ITEM 4.2.2

DEFINED PLANNING / IMPLEMENTATION · INTRODUCED FOR FEEDBACK ONLY

Lindo Channel Recharge — Multi-Benefit Plan for Five Mile *ESA in coordination with Butte County*

- Builds on the June 2026 Lindo Channel recharge feasibility report and efforts in progress by Butte County Public Works; benefits require operational changes at the Big Chico Creek gates at Five Mile.
- Pairs recharge with the County's deferred maintenance — one-time channel/vegetation work to set a template, then ongoing TEK-informed monitoring and upkeep.
- Balances flood conveyance, fish passage, habitat, and recharge; a new governance/funding structure needed to align costs with beneficiaries. Potential funding: DWR Prop 4.

Biomass & Biochar Utilization *Provided by Audubon*

- Biochar on farmland for soil health, water retention & water quality; cultural burning reduces invasive species and fuels while converting biomass to biochar.
- On-farm recharge & demand management pilots with before/after monitoring to document soil, water quality, recharge and other hydrologic outcomes.
- California Open Lands led partnership could include CalFIRE, growers, and local agencies. Potential funding: CalFIRE, DWR, Prop 4.

Related concept under discussion: a Lindo Channel Multi-Benefit Stormwater Recharge Initiative (CA Urban Streams Alliance) — possibly standalone or part of the Lindo Channel project.

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For Reference, from staff memo:

Current PMA Categorization

The existing PMAs are currently organized as summarized below. This information is provided as context for the discussion of potential new PMAs.

In-Progress Projects	Potential Projects
1. Agricultural Irrigation Efficiency (5.2.3.1)	5. Extend Orchard Replacement (5.2.5.1)
2. Residential Conservation (Cal Water) (5.2.3.2)	6. Agricultural Surface Water Supplies Project (5.2.4.2)
3. Scoping for Flood MAR/Surface Water Supply and Recharge (5.2.3.3)	7. Surface Water Supply and Recharge (includes Lindo Channel)* (5.2.4.8)
4. Rangeland Management and Water Retention (BCCER) (5.2.4.6)	

* The Surface Water Supply and Recharge PMA is a broad project description that includes several possible activities involving use of surface water in the subbasin, with Sand Creek and Lindo Channel identified as examples.

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Other Projects

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

Management Actions

1. General Plan Updates (County and City)
2. Domestic Well Mitigation
3. Well Permitting Ordinance
4. Landscape Ordinance
5. Prohibition of Groundwater Use for Ski (Recreational) Lakes
6. Expansion of Water Purveyors' Service Area
7. Groundwater Allocation

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SHAC Feedback

ITEM 4.2.2

- SHAC expressed general support for the new project and management-action concepts introduced.
- Several members preferred categorizing the new concepts as “other projects” rather than as “projects” or “management actions.”

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Requested GSA Board Action

ITEM 4.2.2

Provide direction to staff on the new PMAs to be included in the public review draft of the Vina Periodic Evaluation.

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ITEM 4.2.3

Removing “Non-Dry Year” Language

Consideration of plan amendments and Periodic Evaluation content for Sustainable Management Criteria (SMC), including removal of “non-dry year” language and the Groundwater Level SMC.

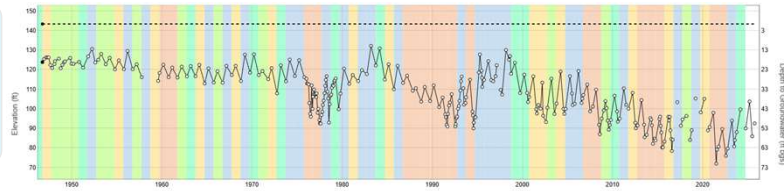
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What is the “non-dry year” condition?

ITEM 4.2.3

- The 2022 GSP defines an undesirable result when minimum thresholds are exceeded during “non-dry” years — wet, above normal, or below normal.
- That excludes dry and critically dry years — so impacts occurring during severe drought would not trigger an undesirable result.
- DWR flagged this in Corrective Actions 3a and 4 as inconsistent with SGMA.
- The neighboring Corning Subbasin had the same language in its GSP that was deemed inadequate and it was removed before later DWR plan approval.
- Other subbasins receiving the same DWR feedback also removed the non-dry year description.

DWR: it is “*inappropriate for a GSA to disregard a depletion of supply based on certain hydrologic or climatic conditions.*”



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Proposed Change: Remove the Qualifier

ITEM 4.2.3

- Staff recommends removing the language rather than keeping it and separately proving dry-year impacts are offset later.
- Specific plan amendments associated with this change are included in the staff memo for consideration

REQUESTED ACTION

Recommend the GSA Boards amend the GSP to remove the language and document the response in the Periodic Evaluation.

Applies across four sustainability indicators:



Groundwater Levels



Water Quality



Groundwater Storage



Interconnected Surface Water

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SHAC Recommendation

ITEM 4.2.3

RECOMMENDATION

SHAC recommends removing the “non-dry year” language from the SMC.

6–1 vote (SHAC, July 22)

Key SHAC Discussion Points

Broad agreement: The subbasin must be managed in both dry and non-dry years; removal is responsive to DWR feedback, and keeping the language would require a strong justification to DWR.

Staff point: If groundwater levels were to reach the minimum thresholds (MTs), the basin is failing to be managed sustainably regardless of water-year type.

Main point to remove: If levels are bouncing around the MT, the basin could dip below the MT only in dry/critical years and sit above it in wet/above average years, so might never trigger an undesirable result. Because MTs are set so low, recovery from a multi-year drought that reached them is uncertain — unprecedented territory to avoid.

Main concern to retain: Removal could conflict with Water Code §10721 (allows drought-period overdraft); recommended legal counsel review before removing compliance-related language.

Also noted: The real issue is two *consecutive* non-dry years — dropping “consecutive” may be functionally similar to removing “non-dry” altogether.

Voting: First a motion to retain the non-dry year language was made, it failed 2-5. Then the motion to remove the language was made and passed, 6-1.

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Groundwater Level Minimum Thresholds



Two Alternatives presented for Consideration



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Groundwater Level Strawman

ITEM 4.2.3

Input on the June strawman shaped the alternatives presented to the SHAC and brought to you today.

- Vina GSA released the Groundwater Level Strawman on June 18, 2026 for input/feedback
- Community members have spent significant time/effort digesting and providing feedback to staff on the strawman
- Input was received at several in-person gatherings
 - June 22 – informal discussion with environmental and domestic well user community members
 - June 24 – SHAC meeting, initial feedback
 - July 6 – informal discussion with environmental, domestic well, and agricultural community members
 - July 8 – Joint Vina and Rock Creek GSA Board Meeting. Board member and public comments received
 - July 14 – Groundwater Levels Public Workshop in Chico

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Groundwater Level Strawman — Here's What Changed

ITEM 4.2.3

Input on the June strawman shaped the alternatives before you today.

STAKEHOLDER INPUT

REFLECTED IN THE ALTERNATIVES

Interest in the Wyandotte Creek approach	➔ Alternative 2 uses that dual-criterion method (deeper of historical low –20 ft OR 5% domestic-well risk).
Apply LMLs to more than the 5 strawman wells	➔ LMLs now on 14 wells, with expanded purpose: GDE/shallow areas, subbasin-boundary alignment, and a domestic-well-dense polygon.
Preference for 2022 MTs to remain unchanged	➔ Alternative 1 retains the comparable 2022 MTs.
Broad (unanimous at SHAC) support to expand monitoring	➔ Both alternatives use the expanded 29-well / 26-area RMS network.
Remove the “non-dry year” language	➔ Memo recommends removal across all four indicators.
Protect domestic wells proactively	➔ Domestic Well Mitigation Program funded to begin in 2027 under both alternatives.

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The Building Blocks (Plain Language)

ITEM 4.2.3

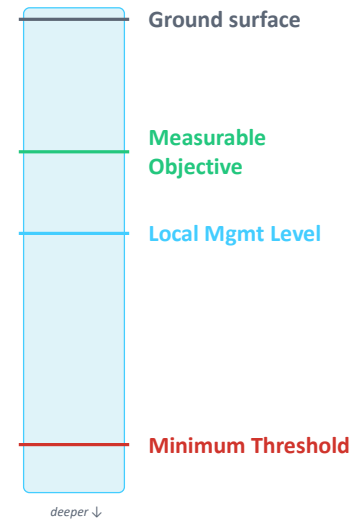
RMS wells — The specific wells we watch — the subbasin's “gauges.”
(29 wells, 26 areas)

Measurable Objective (MO) — The level we manage toward — the goal. Sits well above the MT (avg ~62 ft). Mostly below historical lows.

Local Management Level (LML) — An early-warning trigger 15 ft below the MO — not regulatory response; prompts a closer look.
(Alternative 1 only)

Minimum Threshold (MT) — The regulatory “low line.” Two RMS wells crossing it for two straight years may signal an undesirable result.

The decision: keep 2022 MTs and add early-warning LMLs, or revise the MTs?



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All Subbasins are Managing to the Measurable Objective

Vina Approach

Circumstances and approach differ in different subbasins

Applicable to other subbasins

Figure 15 is from DWR's Sustainable Management Criteria Best Management Practices document

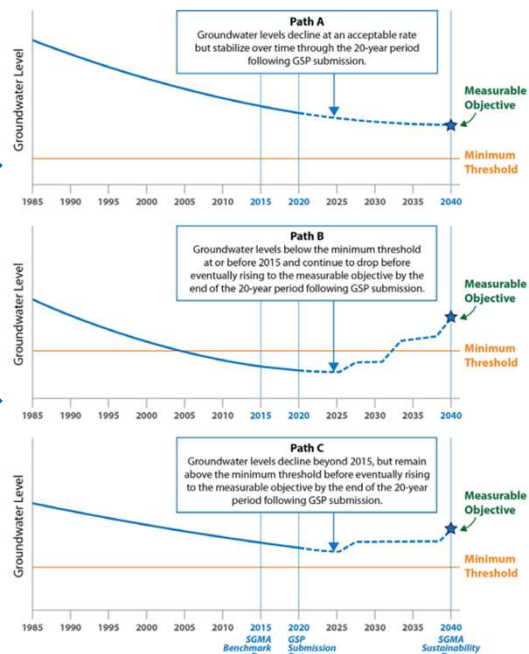


Figure 15. Potential Paths to Sustainability

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Key Considerations Behind the Choice

ITEM 4.2.3

Context staff weighed when shaping the alternatives — useful to talk through as you deliberate.

- Basin setting**
Levels fall in droughts and recover in wet years, but a long-term storage deficit remains. Ag footprint and pumping are stable — no sustained upward trend.

Domestic wells
The MT is a regulatory line, not the level managed toward — MOs average ~62 ft higher. A mitigation program is funded to be developed in 2027.

Well dataset (pre-1980)
Both all-well and post-1980 counts are shown in the memo — broad exposure (but not realistic due to inclusion of all wells since 1900) vs. a practical planning estimate given record limits.

Inter-basin coordination
Vina MTs sit up to 60 ft below Corning and 25–59 ft below Butte, while MOs are much closer — managing toward the MO matters at shared boundaries.
- Environmental uses / GDEs**
Environmental Science Associates and The Nature Conservancy work advances GDE understanding, but the pumping–vegetation link isn't yet locally validated or well understood. Coordinated monitoring is the logical next step.

Chico urban forest
Not fully captured by GDE mapping; the MO–MT gap here averages only ~18 ft — far less than the other management areas. Focused monitoring is proposed with the City.

Adaptive management
The GSP runs on adaptive management; each 5-year Periodic Evaluation is the checkpoint to revisit criteria as new data arrives.

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Common Ground: What's the Same in Both

ITEM 4.2.3

- | | |
|--|--|
| Same expanded monitoring network | 29 RMS wells across 26 representative areas. |
| Same MOs and 2027 Interim Milestones | Comparable to the 2022 GSP for both alternatives. |
| Chico Management Area unchanged | Chico MTs stay the same under both. |
| Domestic Well Mitigation Program | Funded to begin in 2027 regardless of the choice. |
| Continued projects & coordination | Recharge, efficiency, conservation, and inter-basin / surface-water work continue. |

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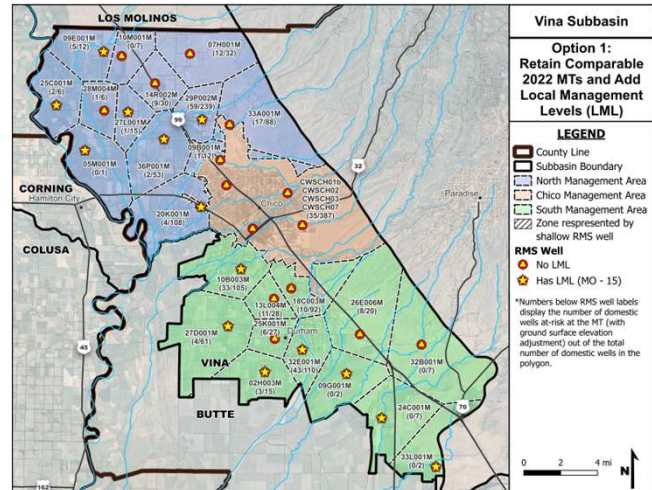
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Alternative 1 — Keep 2022 MTs, Add Early Warning

ITEM 4.2.3

- Carries forward the comparable 2022 GSP Minimum Thresholds; new RMS wells use “comparable” method.
- Adds non-regulatory Local Management Levels (LMLs) — 15 ft below the MO — on 14 RMS wells.
- LML purpose: GDE / shallow areas, subbasin-boundary wells, and a domestic-well-dense polygon.
- Persistently reaching an LML prompts Board consideration of adaptive actions (monitoring, investigation, or implementation of a project or management action).
- Effect: preserves flexibility and avoids premature regulatory action, while adding earlier local triggers.



Vina GSA - Periodic Evaluation

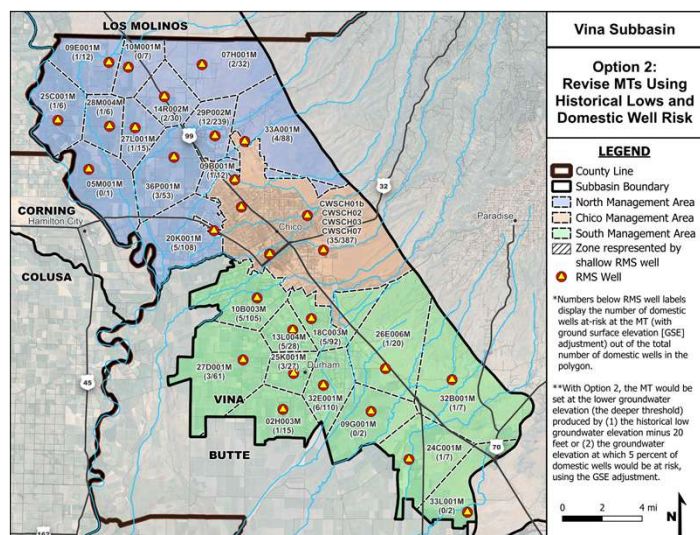
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Alternative 2 — Revise the Minimum Thresholds

ITEM 4.2.3

- New method for all North & South RMS wells (Chico unchanged): MT = the deeper of (1) 20 feet deeper than historical low, or (2) the level where 5% of domestic wells are at risk.
- The 5% domestic well criterion is used for all but two RMS wells (tends to be the deeper of the two criteria)
- Modeled on the Wyandotte Creek draft amendment; similarities to Butte, Corning, Colusa, and Los Molinos.
- No LMLs; MOs and Interim Milestones stay the same.
- Generally more precautionary — raises MTs in most polygons and lowers estimated wells at risk. Yet, 8 RMS wells get a lower MT than 2022 MT.
- Effect: an earlier regulatory trigger on 16 RMS wells.



Vina GSA - Periodic Evaluation

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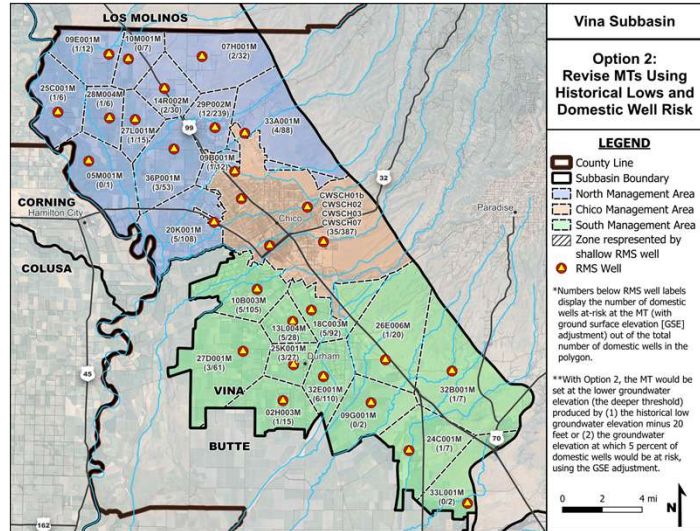
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Alternative 2 — Revise the Minimum Thresholds

ITEM 4.2.3

Breaking the change down across the 25 RMS wells:

- MT level increased in 12 RMS wells (17 to 51 feet higher)
- MT level is similar to 2022 MTs in 5 RMS wells (0 to 3 feet higher)
- MT level is lower than 2022 MTs in 8 RMS wells (1 to 86 feet)
- Chico management area RMS wells unchanged from 2022 MT level (4 RMS wells)



Vina GSA - Periodic Evaluation

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By the Numbers: Domestic Wells with Depths above the MT

Estimated wells with well-bottoms above the MT if levels sat exactly at the Minimum Threshold · post-1980 dataset, subbasin-wide.

1,472

Total domestic wells evaluated

266

At risk — Alternative 1

95

At risk — Alternative 2

Remember: An MT is a regulatory line defining where Undesirable Results occur — not the level the GSAs manage toward. Measurable Objectives sit about 62 ft higher on average, and a separate mitigation program addresses individual wells.

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For Reference, Side-by-Side: How the Two Compare

ITEM 4.2.3

Issue	Alternative 1 — 2022 MTs + LMLs	Alternative 2 — Revised MTs
MT framework	Retains 2022 MTs; adds LMLs 15 ft below MO on a subset of wells.	Revises each MT to the deeper of historical low –20 ft or 5% domestic-well risk. No LMLs.
DWR Corrective Action 3	Expanded network + documented impacts; keeps 2022 MT framework.	Expanded network + documented impacts with generally more precautionary MTs.
Domestic wells	Relies on managing toward the MO, selected LMLs, and the mitigation program.	Fewer wells estimated at risk at the MT. Also relies on managing toward the MO and the mitigation program.
GDEs & Chico forest	Adds LMLs at shallow/GDE wells; supports monitoring. No ecological MTs.	Revised MTs but no local trigger; monitoring still needed.
Inter-basin coordination	LMLs at boundary wells align more closely with neighbors; coordination continues.	Method closer to neighbors, but limited effect on boundary differences.
Regulatory effect	Preserves flexibility; avoids premature action. LMLs add monitoring expectations only.	Earlier regulatory trigger; may prompt action before impacts are confirmed.

Vina GSA · Periodic Evaluation

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SHAC Recommendation

ITEM 4.2.3

RECOMMENDATION SHAC recommends Alternative 2 (revised Minimum Thresholds).

5–2 vote (SHAC, July 22)

Votes: Alternative 1 (Parsley / Lewis) failed 2–5; Alternative 2 (Greene / Schrader) passed 5–2.

Ayes (5): Swan, Parsley, Dawson, Schrader, Greene. **Noes (2):** Lewis, Riley. **Absent:** Sohnrey, Markey.

RCRD (advisory): No.

Majority (5): Revise MTs upward under the new methodology — cuts domestic wells at risk from ~266 to ~95 and addresses public concern over the low 2022 MTs; raising MTs seen as more important than adding Local Management Levels (LMLs).

Other Discussion: Interest in pursuing combined "Option 3" (Alternative 2 + LMLs, possibly set 20 ft below historical low). Several members wanted to explore it but agreed more time/information is needed.

Members also raised concerns that the LML trigger language wasn't prescriptive enough — want defined actions, not just that the Board "could" act.

Minority (2): Opposed Alternative 2; earlier support (incl. Lewis) was for Alternative 1 — retain 2022 MTs and add LMLs.

Not addressed: Motions selected the alternative only; SHAC did not address whether to make the change via GSP amendment or describe it only in the Periodic Evaluation. Staff did note that Alternative 2 would warrant amending the GSP

Vina GSA · Periodic Evaluation

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Requested GSA Board Action

ITEM 4.2.3

Staff is seeking direction from the two GSA Boards regarding:

- a) How to respond to RCA 3a and 4 in the public review draft of the Periodic Evaluation and whether or not to amend the GSP to remove the non-dry year language in the SMC.
 - Amending the GSP to remove reference to non-dry year water year types would include changes to the SMC for Groundwater Levels, Groundwater Storage, Water Quality, and Interconnected Surface Water sustainability indicators (as shown in the staff memo).
 - Not removing the non-dry year language would require “discussing how extractions and recharge will be managed as necessary to ensure that reductions in groundwater levels or storage during dry years are offset by increases in groundwater levels or storage during other years within the sustainable management criteria for the chronic lowering of groundwater levels” in the Periodic Evaluation.

Vina GSA - Periodic Evaluation

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Requested GSA Board Action continued

ITEM 4.2.3

Staff is seeking direction from the two GSA Boards regarding:

- b) Whether expansion of the RMS network to 29 wells should be included as an amendment to the GSP or simply described in the Periodic Evaluation
- c) What approach to use to assign Minimum Thresholds (MTs) to the RMS wells:
 - Alternative 1: Same or comparable 2022 GSP MTs, with addition of Local Management Levels on 14 out of 29 RMS wells
 - Alternative 2: Change MTs based on 20 feet below the historical low, or 5% of domestic wells at risk, whichever is deeper; no Local Management Levels
 - Other direction as specified by the Boards

Vina GSA - Periodic Evaluation

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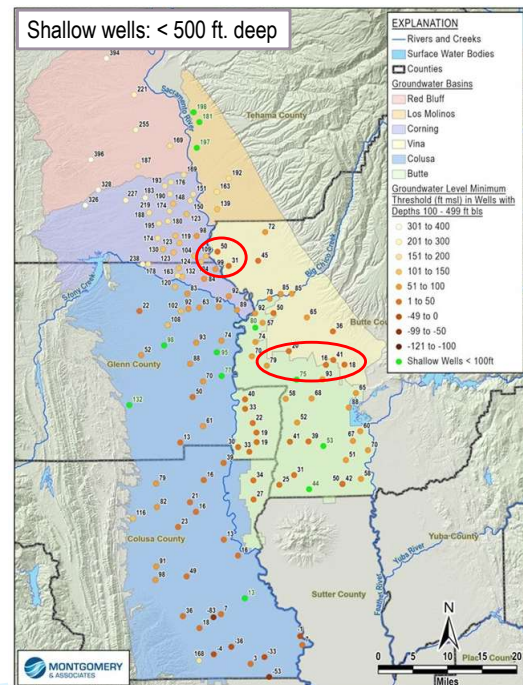
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Additional Slides For Reference

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Groundwater Levels - Observations: Minimum Thresholds

- Differences in selected MT criteria and approaches results in different levels between subbasin boundaries
- MTs at boundaries that are different include Vina boundary with both the Corning and Butte Subbasins
 - Vina's MT levels are up to more than 60 feet lower than MTs in Corning Subbasin
 - At Vina-Butte Subbasin boundary, Vina's MT are 25 to 59 feet lower than Butte
- MT exceedance frequency is used to quantify undesirable results – Subbasins used different approaches which can lead to varying policy outcomes

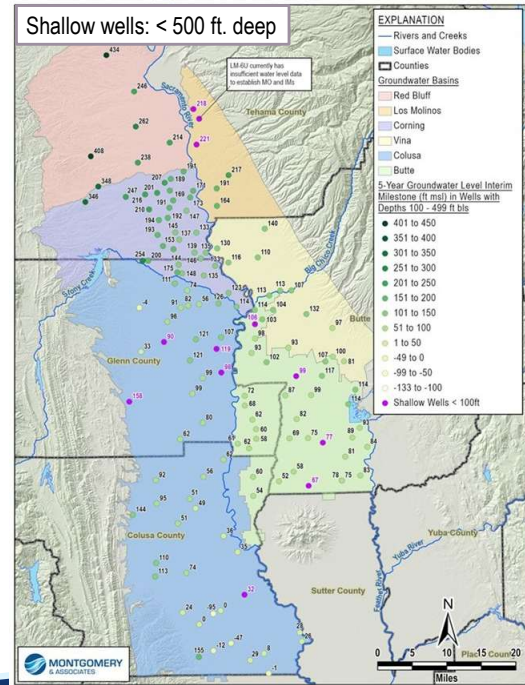


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Groundwater Levels - Observations: 2027 Interim Milestones

- At the Vina and Corning border, IMs differ between 5 and 17 feet
- At the Vina and Butte border, IMs differ by ~10 feet
- At the Colusa and Butte border, differences in IMs are less than 10 feet

→ Differences not likely to need attention





Vina Groundwater Sustainability Agency Agenda Transmittal

Subject: Consideration of draft response to water quality related Recommended Corrective Action for inclusion in the Periodic Evaluation

Contact: Christina Buck

Phone: (530) 552-3593

Meeting Date: August 12, 2026

Agenda Item: 4.2.1

Summary: Staff will present an overview of the topic, including feedback provided by the Vina Stakeholder Advisory Committee (SHAC) at their July 22, 2026 meeting.

Requested Action:

Staff requests direction from the two GSA Boards on the response to RCA 1 which will be included in the Periodic Evaluation.

Attachments:

1. Staff Memo provided to the Vina SHAC – Consideration of Draft Responses to Recommended Corrective Action 1 regarding Water Quality



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. Water and Resource Conservation (providing technical staff support to the GSA) and Laura Foglia and Ryan Fulton, Larry Walker Associates

Date: July 16, 2026

Subject: **Consideration of Draft Responses to Recommended Corrective Action 1 regarding Water Quality**

DWR Recommended Corrective Actions

Provided below is Recommended Corrective Action (RCA) 1, as stated in the Determination Letter:



Recommended Corrective Action 1

Provide additional information on historical and current groundwater quality conditions in the Subbasin and refine the definition of sustainable management criteria including:

- a. *Provide additional information in the GSP outlining the location and extent of contamination plumes, identifying which constituents are being monitored under various programs, and thoroughly describing ongoing remediation efforts within the Subbasin.*
- b. *Evaluate whether groundwater management actions, including production and/or replenishment under the jurisdiction of the GSAs, may influence the migration of contaminant plumes.*
- c. *Investigate if groundwater quality issues are adversely impacting groundwater supply and beneficial uses and provide information if there are any mitigation programs in place and the effectiveness of such programs.*
- d. *Coordinate with the lead agencies overseeing these remediation sites regularly and update the Plan stating how existing groundwater quality conditions and/or remediation efforts may impact the GSAs' ability to manage groundwater.*

DWR expects GSAs to consider and respond to the RCAs for the first periodic evaluation, due in January 2027. The PE will summarize and respond to the RCAs by describing what they were, whether they were addressed, and whether they led to a Plan Amendment. The following is a draft of how the GSAs could respond to this RCA in the PE.

DRAFT Responses to RCA

The goal of groundwater quality management under SGMA is to supplement information available from other sources with data targeted to assist the GSAs in the Vina Subbasin to assess how groundwater pumping and projects and management actions (PMAs) impact water quality. The GSAs do not replace other water quality agencies and programs responsible for protecting water quality across the State. Current water quality conditions are described in Section 6.4 of the Periodic Evaluation which shows the Subbasin does not have significant historical or existing water quality issues. There are localized contamination plumes under the jurisdiction of other regulatory programs within the Subbasin. The GSAs have not implemented large scale recharge projects yet. The planned PMAs are expected to minimize the movement of known contamination plumes and dilute contaminant concentrations through groundwater recharge. The Vina Subbasin Surface Water Supply and Recharge Feasibility Study identified known contamination plumes near proposed recharge projects (Geosyntec, June 2026). A water quality monitoring plan to monitor the water quality of recharge water and the underlying aquifer would be developed as projects are implemented.

In DWR's 2023 GSP determination letter, the department identified recommended corrective actions regarding water quality. DWR's corrective actions are shown below, verbatim, followed by the draft GSA response.

Corrective Action 1a: *Provide additional information in the GSP outlining the location and extent of contamination plumes, identifying which constituents are being monitored under various programs, and thoroughly describing ongoing remediation efforts within the Subbasin.*

GSA Response: The 2022 GSP listed and mapped (Figure 2-18) locations of impacted groundwater due to existing plumes, identified by reviewing information available on the SWRCB Geotracker / GAMA website, the California Department of Toxic Substances Control (DTSC) EnviroStor website, and the Environmental Protection Agency's (EPA) National Priorities List (NPL). After a review of all contamination plumes within the Subbasin, no significant changes have occurred since the 2022 GSP to warrant an update to the known sites and contamination plumes within the Subbasin. Section 2.2.4.2 of the GSP lists and describes all existing contamination sites, contaminants of concern, and the corresponding responsible agency and/or mitigation program. The Vina Subbasin Surface Water Supply and Recharge Feasibility Study identified known contamination plumes near proposed recharge projects (Geosyntec, June 2026). The GSAs will continue to coordinate with other regulatory agencies to update the location and extent of contamination plumes as needed.

Corrective Action 1b: *Evaluate whether groundwater management actions, including production and/or replenishment under the jurisdiction of the GSAs, may influence the migration of contaminant plumes.*

GSA Response: Evaluation of water quality data did not reveal significant impacts from pumping. This finding is based on a trend analysis, as described in Section 6.4 of the Periodic Evaluation assessing specific conductance changes. No changes have occurred over this evaluation period. GSAs will evaluate available water quality sampling results to determine concentrations of other potential constituents of concern including nitrate, perfluorooctanoic acid, and perfluorooctanoic sulfonate per State Water Resources Control Board recommendations. The goal is to demonstrate that all constituents currently being monitored by other agencies have been kept at reasonable levels within the Subbasin and are not impacted by groundwater pumping or implementation of PMAs. As described above, water quality monitoring to monitor the water quality of recharge water and the underlying aquifer would occur as needed as projects are implemented.

Corrective Action 1c: *Investigate if groundwater quality issues are adversely impacting groundwater supply and beneficial uses and provide information if there are any mitigation programs in place and the effectiveness of such programs.*

GSA Response: Member agency Butte County staff and members of the GSA consulting team have participated in Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) webinars and have responded to CV-SALTS requests for the GSAs input. Additionally, point-source contaminants are managed and regulated through a variety of other programs by the Regional Water Quality Control Board, DTSC, and the EPA. Through coordination with existing agencies, the GSAs will know if existing regulations are being met or groundwater pumping activities in the Vina Subbasin are contributing to significant and unreasonable undesirable effects related to degraded water quality. The GSAs will continue to track and communicate as needed to stay engaged with these other regulatory programs to monitor any groundwater quality issues and mitigation programs.

Corrective Action 1d: *Coordinate with the lead agencies overseeing these remediation sites regularly and update the Plan stating how existing groundwater quality conditions and/or remediation efforts may impact the GSAs' ability to manage groundwater.*

GSA Response: As mentioned above, the goal of groundwater quality management under SGMA is to supplement information available from other sources with data targeted to assist the GSAs in the Vina Subbasin comply with the requirements of SGMA. Development of groundwater quality-related SMC for the Subbasin is not intended to duplicate or supplant the goals and objectives of ongoing programs including Butte County, the Sacramento Valley Water Quality Coalition (SVWQC), the CRC (2019), and the State Drinking Water Information System (SDWIS).

Because irrigated agriculture is the predominant land use in the subbasin, monitoring of the groundwater quality data developed through the Groundwater Quality Trend Monitoring Work Plan (GQTMWP) being implemented by the SVWQC and by the CRC for compliance with the CVRWQCB's ILRP will be an important source of information to the GSA in the Vina Subbasin. The SVWQC has identified priority High Vulnerability Areas (HVA) in the Vina Subbasin for nitrate (SVWQC, 2023).

Among the contaminants that may affect groundwater conditions in the future are Chemicals of Emerging Concern (CECs). These are contaminants having toxicities not previously recognized, which may have the potential to cause adverse effects to public health or the environment and are found to be building up in the environment or to be accumulating in humans or wildlife.

The Butte County Department of Water and Resource Conservation (BCWRC) manages the Groundwater Quality Trend Monitoring Program to provide information on groundwater quality, specifically salinity, for GSAs. Annual data collected by the program is reported in the GSP annual reports. Program goals include establishing a baseline of water quality data to document any water quality temporal trends and ensure that groundwater resources are well managed by documenting groundwater water quality.

Water quality samples will be evaluated (as needed) to determine concentrations of other potential constituents of concern including nitrate, perfluorooctanoic acid (PFOA), and perfluorooctanoic sulfonate (PFOS) per State Water Resources Control Board recommendations. All constituents currently being monitored by other agencies have been kept at reasonable levels within the Subbasin and are not impacted by groundwater pumping. Additionally, the GSA plans to develop a handout that highlights key water quality issues in the subbasin to provide to project partners to ensure projects take water quality into consideration during feasibility, design and implementation.

Member agency Butte County staff and members of the GSA consulting team stay informed regarding groundwater quality issues and mitigation programs in the Subbasin. Staff have participated in CV-SALTS webinars and have responded to CV-SALTS requests for GSA input. Additionally, point-source contaminants are managed and regulated through a variety of other programs by the Regional Water Quality Control Board, DTSC, and the EPA. Through

coordination with existing agencies, the GSAs will know if existing regulations are being met or groundwater pumping activities in the Vina Subbasin are contributing to significant and unreasonable undesirable effects related to degraded water quality. The GSA will continue to stay engaged with these other regulatory programs.

Requested Action

Provide feedback to staff.



Vina Groundwater Sustainability Agency

Agenda Transmittal

Subject: Consideration of potential new Projects and Management Actions (PMAs) for inclusion in the Periodic Evaluation

Contact: Christina Buck

Phone: (530) 552-3593

Meeting Date: August 12, 2026

Agenda Item: 4.2.2

Summary: Staff will present an overview of the topic, including feedback provided by the Vina Stakeholder Advisory Committee (SHAC) at their July 22, 2026 meeting. The purpose of this agenda item is to introduce the concepts and receive early questions and feedback from the GSA Boards. Staff is not requesting action or direction at this meeting on whether any of the concepts should be added to the PMA list.

The Boards are encouraged to provide feedback on each concept's objective, proposed lead and participating entities, potential funding, relationship to existing PMAs, and relevance to groundwater sustainability. Feedback is also requested on whether the concepts are best characterized as projects or management actions and, for the project concepts, whether they would be part of the GSAs' active implementation strategy or more appropriately categorized as Other Projects. Staff will use this input to work with project proponents to refine the descriptions and proposed categorization for inclusion in the public review draft of the Periodic Evaluation. The potential PMAs will be presented to the SHAC for formal recommendation before being presented to the Vina GSA and Rock Creek Reclamation District GSA Boards for formal consideration, as warranted. Discussion at this stage does not commit the GSAs to implementation or funding.

Requested Action:

Provide direction to staff on the new PMAs to be included in the public review draft of the Vina Periodic Evaluation.

Attachments:

1. Staff Memo provided to the Vina SHAC – Introduction of Potential New Projects and Management Actions for the GSP Periodic Evaluation



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. Water and Resource Conservation
(providing technical staff support to the GSA)

Date: July 16, 2026

Subject: Introduction of Potential New Projects and Management Actions for the GSP Periodic Evaluation

Background

The Vina Groundwater Sustainability Plan (GSP) identifies Projects and Management Actions (PMAs) that the Vina Groundwater Sustainability Agency (GSA), Rock Creek Reclamation District GSA, their member agencies, or project partners may implement to help achieve and maintain groundwater sustainability. As part of the first GSP Periodic Evaluation, due to the California Department of Water Resources (DWR) in January 2027, the GSAs must evaluate the status and continued relevance of the existing PMAs and describe significant new information, including potential additions to or changes in the PMA list.

At its March 25, 2026 meeting, the Stakeholder Advisory Committee (SHAC) reviewed an approach for organizing the existing GSP projects to support the Periodic Evaluation and ongoing annual reporting. That discussion focused on distinguishing the projects that are part of the GSAs' active implementation strategy from projects led primarily by other entities that may provide ancillary groundwater benefits.

Recap of Existing PMA Categorization

The March discussion presented two primary project categories. This framework is intended to make annual tracking more focused and meaningful while retaining the broader range of projects considered in the GSP:

- **PMAs:** Projects that the GSAs, member agencies, or partners are actively pursuing or may pursue as part of the strategy to maintain or achieve sustainability. These projects are categorized as Completed, In-Progress, or Potential and are the primary focus of annual tracking in [DWR's PMA Module](#).
- **Other Projects:** Projects led primarily by other agencies or entities that may benefit groundwater conditions but are not currently relied upon as part of the GSAs' active sustainability strategy. These projects remain in the broader GSP planning framework and are documented in the Periodic Evaluation; however they are tracked annually only as feasible and would not be included in the PMA Module.

Management Actions are tracked separately from projects. The seven management actions identified in the GSP are currently included in the PMA Module and are reported on annually.

Current PMA Categorization

The existing PMAs are currently organized as summarized below. This information is provided as context for the discussion of potential new PMAs.

In-Progress Projects	Potential Projects
1. Agricultural Irrigation Efficiency (5.2.3.1) 2. Residential Conservation (Cal Water) (5.2.3.2) 3. Scoping for Flood MAR/Surface Water Supply and Recharge (5.2.3.3) 4. Rangeland Management and Water Retention (BCCER) (5.2.4.6)	5. Extend Orchard Replacement (5.2.5.1) 6. Agricultural Surface Water Supplies Project (5.2.4.2) 7. Surface Water Supply and Recharge (includes Lindo Channel)* (5.2.4.8)

** The Surface Water Supply and Recharge PMA is a broad project description that includes several possible activities involving use of surface water in the subbasin, with Sand Creek and Lindo Channel identified as examples.*

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

Management Actions
1. General Plan Updates (County and City) 2. Domestic Well Mitigation 3. Well Permitting Ordinance 4. Landscape Ordinance 5. Prohibition of Groundwater Use for Ski (Recreational) Lakes 6. Expansion of Water Purveyors' Service Area 7. Groundwater Allocation

Consideration of Potential New PMAs

As work on the Periodic Evaluation has progressed, four primary PMA concepts have been identified and brought forward by stakeholders and community groups for preliminary consideration. Two are monitoring and assessment activities presented as potential management actions, and two are discrete project concepts. The descriptions below also include two related concepts that are still being discussed as either standalone PMAs or components of one of the four primary concepts. The purpose of this agenda item is to introduce the concepts and receive early questions and feedback from the SHAC. Staff is not requesting a recommendation at this meeting on whether any of the concepts should be added to the PMA list.

The SHAC is invited to comment on each concept's objective, proposed lead and participating entities, potential funding, relationship to existing PMAs, and relevance to groundwater sustainability. Feedback is also requested on whether the concepts are best characterized as projects or management actions and, for the project concepts, whether they would be part of the GSAs' active implementation strategy or more appropriately categorized as Other Projects. Staff will use this input to work with project proponents to refine the descriptions and proposed categorization. The potential PMAs will return at a future meeting for formal recommendation by

the SHAC before being presented to the Vina GSA and Rock Creek Reclamation District GSA Boards for formal consideration. Discussion at this stage does not commit either GSA to implementation or funding.

Potential New Management Actions

For purposes of the GSP, monitoring and assessment activities are generally more appropriately characterized as management actions rather than projects. These activities involve ongoing data collection, evaluation, engagement, and adaptive management that inform GSA decisions, rather than construction or implementation of project with discrete deliverables and quantifiable benefits. Characterizing an activity as a management action clarifies how it would be implemented and reported.

Several of the proposals were developed by local environmental stakeholders, California Open Lands, and ecological technical assistance providers through the Underrepresented Communities, California Tribes, and Small Farmers Groundwater Technical Assistance (URCTA) program and were submitted to the Vina GSA by Audubon for consideration.

1. Local Refinement of GDE Mapping with Place-Based Monitoring Plan (Management Action)

Provided by Audubon.

The GSA's expansion of the shallow groundwater monitoring well network creates a new opportunity to develop and begin implementing a place-based monitoring plan for priority GDEs and refine the statewide GDE datasets to better identify locally important non-riparian vegetation, including groundwater-dependent oak woodlands and urban tree canopy that existing statewide mapping does not adequately capture. The monitoring plan would establish baseline ecological conditions, field survey and NDVI-based vegetation health indicators, and habitat use by special-status species. It would define potential timing or response triggers tied to Local Management Levels and ecological thresholds, and would help identify groundwater-driven impacts to GDEs. The plan would integrate the best available science, including Traditional Ecological Knowledge (TEK), the work of place-based scientists, local resource specialists, ESA's GDE technical studies, and findings from the URCTA ecological technical assistance project. Trained volunteers, schools, and local partners would contribute supplemental observations and ground-truthing, broadening engagement and strengthening monitoring network confidence. This effort can be leveraged by local partners to design multibenefit projects that deliver clear value to the broader agricultural, environmental, and Tribal community. No groundwater level triggers are associated with this refinement work. Local environmental stakeholders, California Open Lands, CA Urban Streams Alliance, Butte County Resource Conservation District, Audubon, and The Nature Conservancy would support this work. Initial support is anticipated from the DWR URCTA program, and Proposition 4 has been identified as an additional potential funding source. Project proponents would pursue future implementation funding.

The community science management action listed below is also in active discussion to determine whether it is an independent PMA or an additional component of this effort.

Community Science, Watershed Stewardship, and SGMA Implementation Support Program (Management Action)

Related concept under discussion, provided by CA Urban Streams Alliance.

This project supports implementation of the Vina GSA Groundwater Sustainability Plan (GSP) by establishing a community science and watershed stewardship program that complements the GSA's technical monitoring and stakeholder engagement efforts. Using trained volunteers,

schools, and local partners to collect supplemental observations on streamflow, groundwater-dependent ecosystems (GDEs), water quality, and watershed conditions, the project helps improve understanding of interconnected surface water-groundwater relationships, provides ground-truthing for monitoring networks, identifies potential data gaps, and supports adaptive management. The program also expands meaningful stakeholder engagement beyond traditional public meetings by actively involving residents in monitoring and stewardship activities. These efforts directly address several deficiencies identified by the California Department of Water Resources (DWR) for the 2027 GSP Periodic Evaluation, including the need for additional information and analysis related to interconnected surface waters, GDEs, monitoring network confidence, groundwater quality protection, and more robust stakeholder involvement, while creating opportunities to leverage partnerships with the City of Chico, watershed organizations, schools, and other agencies.

2. Chico Urban Forest Vulnerability Assessment and Monitoring Plan (Management Action)

Provided by Audubon.

The GDE Technical Study flagged the Chico area as GDE-sensitive but identified a crucial data gap regarding how dependent the city's unirrigated, deep-rooted trees are on regional groundwater versus soil moisture or local recharge. To satisfy DWR Recommended Corrective Action 3 requirements for evaluating impacts to environmental beneficial users, this management action establishes a two-tiered vulnerability assessment and monitoring plan for Bidwell Park's unirrigated riparian and non-riparian canopy, alongside citywide deep-rooted trees. Tier 1 employs publicly available satellite imagery and a z-NDVI (standardized vegetation-greenness anomaly) approach—consistent with Rohde et al.'s published GDE-monitoring methodology—to efficiently screen canopy trends. Tier 2 pairs this screening with the City's existing tree inventory and targeted field assessments (canopy health, crown dieback, and regeneration) at locations tied to the shallow, GDE-sensitive RMS wells from the groundwater level strawman. This strategy efficiently fills an acknowledged gap by leveraging an established municipal data system to provide the field evidence needed to distinguish drought-driven vegetation stress from groundwater-driven decline. It directly operationalizes the Local Management Level (LML) concept for Chico-area wells with actual ground-truthing, implementing the adaptive-management actions already listed in the strawman's Section 5. Baseline assessments will begin immediately as a precautionary step, with monitoring intensifying and triggering formal evaluation only if a Chico-area/GDE-sensitive well reaches its LML. Project partners include the City of Chico Public Works Urban Forestry Division, Butte County, and potentially CSU Chico. Funding is anticipated through a blend of Sustainable Groundwater Management grant support and a possible CSU Chico research partnership.

Potential New Projects

The following concepts are structured as projects because they contemplate defined planning or implementation efforts and project deliverables. Depending on the lead entity, relationship to the GSAs' active implementation strategy, and future funding or implementation commitments, one or more may ultimately be categorized as Other Projects rather than a PMA. No categorization decision is requested at this meeting.

1. Lindo Channel Recharge through a Multi-Benefit Management Plan for Five Mile (Project)

Provided by Environmental Science Associates in coordination with Butte County.

In June 2026, the Vina GSA completed the "Project Feasibility and Alternatives Report - Feasibility of Enhanced Recharge in the Lindo Channel." Achieving recharge benefits will require operational changes to the Big Chico Creek Gates at Five Mile and ongoing monitoring and

maintenance of the dynamic gravel/cobble channel that controls flows into Lindo Channel. Because Butte County also faces significant deferred maintenance at the Five Mile flood management facility, advancing recharge will require an integrated approach to operations and maintenance. Butte County and the Vina GSA can address both recharge and deferred maintenance by developing a comprehensive Multi-Benefit Management Plan for Five Mile (Project). The Plan would establish a reconfigured channel template through one-time channel and vegetation maintenance, then work with local Traditional Ecological Knowledge (TEK) practitioners and community resource specialists to monitor and maintain that template over time to balance flood conveyance, fish passage, habitat, and recharge. A new governance and funding structure would support long-term, multi-benefit O&M and align costs with beneficiaries. The Plan, funding program, and governance structure would be developed as a Project completed by an engineering and environmental services team experienced in integrated, multi-benefit water resource projects. Project partners could include Environmental Science Associates, CA Urban Streams Alliance, California Open Lands, and local agencies. Potential funding includes upcoming DWR Proposition 4 grants and conditions are correct for project implementation once funding is secured.

Lindo Channel Multi-Benefit Stormwater Recharge Initiative:

Related concept under discussion provided by CA Urban Streams Alliance.

Please note that the above project is in active discussion among stakeholders to consider potential additions. The Lindo Channel description below, provided by CA Urban Streams Alliance, could be considered a separate project or as an additional component to the Lindo Channel project described above.

This project supports implementation of the Vina GSA Groundwater Sustainability Plan (GSP) by integrating stormwater management, managed aquifer recharge, water quality protection, monitoring, and watershed stewardship into a coordinated, multi-benefit approach. Building on planned City of Chico MS4 stormwater improvements, the project would evaluate opportunities to capture, treat, monitor, and infiltrate seasonal stormwater flows to improve groundwater recharge while enhancing understanding of interconnected surface water-groundwater interactions. Expanded monitoring of streamflow, groundwater, water quality, and groundwater-dependent ecosystems (GDEs), combined with community science and ground-truthing of monitoring networks, would provide supplemental information to improve monitoring confidence, identify data gaps, and support adaptive management. The project also expands meaningful stakeholder engagement through hands-on participation and partnerships with the City, watershed organizations, schools, and other agencies. By leveraging existing and planned infrastructure investments to achieve multiple resource objectives, the project directly supports SGMA implementation and helps address several DWR recommendations for the 2027 GSP Periodic Evaluation, including improving evaluation of recharge opportunities, interconnected surface waters, groundwater quality, GDEs, monitoring network effectiveness and stakeholder engagement.

2. Biomass and Biochar Utilization for Demand Management, Regenerative Agriculture, and Multibenefit Recharge (Project)

Provided by Audubon.

This project centers Traditional Ecological Knowledge (TEK) and cultural burning alongside demand-management strategies to balance localized overdraft and stabilize groundwater levels near priority GDEs. Applying biochar to farmland would deliver measurable soil health, water retention, and water-quality benefits across the Vina subbasin. Low-intensity cultural burning would reduce invasive species that compete with and degrade GDEs, lower hazardous fuels, and convert excess biomass into biochar. That biochar could also improve water-quality outcomes from recharge projects and filter urban runoff contaminants before they reach the shallow aquifer. On-farm recharge and demand management pilots would include before-and-after monitoring to

document soil, water-quality, recharge, and other hydrologic outcomes. Beyond these hydrologic benefits, the project would build durable local capacity through tribal co-management agreements, job training, eco-tourism, and cultural education centered on groundwater-dependent native foods, fiber, and medicine. California Open Lands would lead a partnership that could include CAL FIRE, growers, and local agencies and partners. With growing state support for Indigenous-led stewardship, funding is anticipated through CAL FIRE, DWR, Proposition 4, and other sources. No groundwater level triggers are associated with the implementation of this project.

Requested Action

Receive information regarding the potential new PMAs and related concepts under discussion and provide questions and preliminary feedback to staff regarding their objectives, characterization, relationship to existing PMAs, and potential categorization. No formal recommendation or decision is requested at this meeting.



Vina Groundwater Sustainability Agency

Agenda Transmittal

Subject: Consideration of plan amendments and Periodic Evaluation content for Sustainable Management Criteria (SMC), including removal of “non-dry year” language and the Groundwater Level SMC.

Contact: Christina Buck

Phone: (530) 552-3593

Meeting Date: August 12, 2026

Agenda Item: 4.2.3

Summary: Board consideration will include:

- a) Response to Recommended Corrective Actions (RCAs) 3 and 4 related to “non-dry year” language in the SMC. The Boards will consider a potential Groundwater Sustainability Plan (GSP) amendment to remove the “non-dry year” language from the SMC.
- b) Potential changes to the Groundwater Level SMC in the Periodic Evaluation or through plan amendments, including consideration of an expanded Representative Monitoring Site (RMS) network and Alternatives for the Minimum Threshold.

Two attached staff memos provide critical background and considerations for the topics listed above, as well as options for the Boards’ consideration. These memos were provided to the Vina Stakeholder Advisory Committee (SHAC) at their July 22, 2026 meeting. Staff will present an overview of the topic, including feedback and recommendations provided by the SHAC on these topics.

Requested Action: Staff is seeking direction from the two GSA Boards regarding:

- a) How to respond to RCA 3 and 4 in the public review draft of the Periodic Evaluation and whether or not to amend the GSP to remove the non-dry year language in the SMC.
 - Amending the GSP to remove reference to non-dry year water year types would include changes to the SMC for Groundwater Levels, Groundwater Storage, Water Quality, and Interconnected Surface Water sustainability indicators (as shown in the staff memo).
 - Not removing the non-dry year language would require “discussing how extractions and recharge will be managed as necessary to ensure that reductions in groundwater levels or storage during dry years are offset by increases in groundwater levels or storage during other years within the sustainable management criteria for the chronic lowering of groundwater levels” in the Periodic Evaluation.
- b) Whether expansion of the RMS network to 29 wells should be included as an amendment to the GSP or simply described in the Periodic Evaluation
- c) What approach to use to assign Minimum Thresholds (MTs) to the RMS wells:
 - Alternative 1: Same or comparable 2022 GSP MTs, with addition of Local Management Levels on 14 out of 29 RMS wells
 - Alternative 2: Change MTs based on 20 feet below the historical low, or 5% of domestic wells at risk, whichever is deeper; no Local Management Levels
 - Other direction as specified by the Boards

Attachments:

1. Staff Memo - Consideration of Plan amendments to remove “non-dry” from Sustainable Management Criteria in response to Department of Water Resources’ Recommended Corrective Actions
2. Staff Memo – Consideration of Alternatives for Addressing Department of Water Resources’ Recommended Corrective Actions and Stakeholder Concerns regarding Groundwater Level Sustainability Indicator Sustainable Management Criteria
3. Public comments received on this and related topics, May 2026-August 5, 2026.



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. Water and Resource Conservation (providing technical staff support to the GSA) and Laura Foglia and Ryan Fulton, Larry Walker Associates

Date: July 16, 2026

Subject: **Consideration of Plan amendments to remove “non-dry year” from Sustainable Management Criteria in response to Department of Water Resource’s Recommended Corrective Actions**

Background

The Vina Groundwater Sustainability Plan (GSP) was adopted in December 2021 by the Vina Groundwater Sustainability Agency (GSA) and Rock Creek Reclamation District GSA and subsequently reviewed and approved by the California Department of Water Resources (DWR) in July 2023. As part of its review, DWR provided Recommended Corrective Actions (RCAs) in its [Determination Letter](#) identifying several areas for improvement with an expectation that the RCAs should be considered by the GSAs in the first periodic evaluation of the GSP or addressed through amendments to the GSP. The Sustainable Groundwater Management Act (SGMA) requires the GSAs to submit the first Periodic Evaluation (PE) by January 2027. The PE is the GSA’s written assessment of its GSP implementation. The Vina GSA received funding through the Sustainable Groundwater Management Round 2 grant program to support work to address data gaps identified in the plan and complete the PE. Larry Walker Associates (LWA) was competitively selected to complete this work. In addition, Butte County staff provide technical staff support to the Vina GSA due to their local expertise and institutional knowledge. Documents and resources related to development of the PE and associated amendments to the GSP can be found online: <https://www.vinagsa.org/gsp-periodic-evaluation>.

DWR Recommended Corrective Actions

Provided below is Recommended Corrective Action 3a and 4, as stated in the Determination Letter:



Recommended Corrective Action 3

Provide sufficient information regarding criteria used to identify significant and unreasonable conditions, undesirable results, and the potential impacts to various beneficial uses and users of groundwater related to the chronic lowering of groundwater level minimum thresholds. The GSAs should address the following items:

- a. Revise the definition of undesirable results and language pertaining to significant and unreasonable lowering of groundwater level to remove the non-dry year condition or

discuss how extractions and recharge will be managed as necessary to ensure that reductions in groundwater levels or storage during dry years are offset by increases in groundwater levels or storage during other years within the sustainable management criteria for the chronic lowering of groundwater levels.

....

Recommended Corrective Action 4

Revise the definition of undesirable results to remove the non-dry year condition or discuss how degradation during dry period will be managed as necessary to ensure that adverse water quality conditions are offset during other periods.

Neighboring Subbasins

The Corning Subbasin had similar “non-dry year” language in its 2022 GSP, which was deemed inadequate by DWR in their [Determination Letter](#) dated October 26, 2023. Given feedback from DWR, the GSAs removed it when resubmitting their GSP in 2024. GSPs from other subbasins in the state with “non-dry year” language received the same RCA from DWR and many were not approved. Here is additional explanation from DWR in its Determination Letter to Corning:

The definition of undesirable results also includes a caveat related to the water year type that prohibits an undesirable result from occurring during any water year defined as ‘dry’ or ‘critically dry’ that is not consistent with SGMA. The water year type requirement could potentially allow for unmanaged and continued lowering of groundwater levels under certain hydrologic or climatic conditions that have occurred historically, and GSAs could disregard potential impacts of groundwater level declines regardless of how severe they become. Since the GSP Regulations require that GSAs define undesirable results caused by the chronic lowering of groundwater levels by identifying a significant and unreasonable depletion of supply, it is inappropriate for a GSA to disregard a depletion of supply based on certain hydrologic or climatic conditions. Department staff conclude the definition of undesirable results disregards minimum threshold exceedances in all years except consecutive below normal, above normal, or wet years to be inconsistent with sustainable groundwater management under SGMA (see Corrective Action 2b).

Recommended Amendments to the Vina GSP

In light of DWR’s clear direction that SGMA’s undesirable results framework is not intended to exclude conditions that happen to occur during dry periods, and because removing the qualifier yields a more protective and conservative standard for identifying undesirable results, staff recommends removing the “non-dry year” condition rather than retaining it and separately demonstrating how degradation occurring during dry periods would be offset in other periods, as also allowed under Corrective Action 4. The following amendments would be necessary should the GSA Boards agree with this approach:



Proposed amendments to the Groundwater Level Sustainable Management Criteria, shown as edits to 2022 GSP text, page 145-146:

*In recent years, Butte County has documented a number of domestic wells that have “gone dry,” meaning groundwater levels have fallen below the depth of the well installation and/or pump. This occurred during summer months of recent drought years and heightened concern among some stakeholders. For example, in the critically dry year of 2021, 44 wells were reported dry county-wide through the State’s online reporting system. As a result, domestic well reliability and protection are the focus of the Groundwater Levels MT. From a policy perspective, **multiple sustainably constructed domestic wells going dry during non-dry year conditions in a single management area** would be a “significant and unreasonable” undesirable result of groundwater management. 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.~~

~~Non-dry year types include wet, above normal, and below normal as defined by the Sacramento Valley Water Year Index. Dry year types include dry and critical water year types. See Section 2.3.1 for more information on the Sacramento Water Year Index. As shown in the figures presented in Appendix 3-A showing the average depth of domestic, irrigation, and public supply wells, domestic wells are generally shallower than other wells throughout the Vina Subbasin. These figures were constructed using data from DWR OSWRC. Protection of domestic wells was therefore deemed to be additionally protective of other well types, such as agricultural wells. In addition, the lowering of groundwater levels during two or more consecutive dry and/or critically dry year types is not considered significant and unreasonable and therefore not considered an undesirable result, as long as the groundwater levels rebound to levels greater than the MT following those consecutive dry and/or critically dry years. The Vina Subbasin SMC for Chronic Lowering of Groundwater Levels is based on groundwater levels throughout the Vina Subbasin that would support sustainably constructed domestic wells. Sustainably constructed implies wells that have been installed following the relevant County Well standards within permeable aquifer material and the wells that have been appropriately maintained (e.g., well problems are not due to clogging of well screens or silting of well). Exceeding the MT may lead to significant and unreasonable effects during drought years and to potential impacts to domestic wells and other beneficial groundwater users and/or uses. may occur and would not constitute an Undesirable Result. Local and state drought responses play a role in addressing dry year impacts. However, once a drought period ends, it is anticipated that groundwater conditions should return to the MO levels. Year type is defined according to the Sacramento Valley Water Year Hydrologic Classification and groundwater level is defined based on groundwater elevation above msl.~~



Proposed amendments to the Groundwater Storage Sustainable Management Criteria, shown as edits to 2022 GSP text, page 151:

3.4.2 Minimum Thresholds

As Groundwater Levels SMC are used by proxy, the MT for groundwater storage is the same as for groundwater levels:

~~Two RMS wells within a management area reach their MT for two consecutive years of non-dry year types.~~

In the historical record, there are isolated incidences of shallow wells going dry during summer months of recent critically dry years. This was noted in the earlier section addressing the development of Groundwater Levels SMC. MT intended to prevent significant and unreasonable negative impacts related to the chronic lowering of groundwater levels are assumed adequate to protect against significant and unreasonable reductions of groundwater storage.



Proposed amendments to the Water Quality Sustainable Management Criteria, shown as edits to 2022 GSP text, page 151:

3.5 Water Quality Sustainable Management Criteria

Water Quality SMC are those meant to address degraded water quality caused by groundwater pumping. The locally defined undesirable result, MT, and MO are discussed in the next sections.

3.5.1 Undesirable Result

An undesirable result coming from degraded water quality is experienced if:

groundwater pumping that degrades water quality and compromises the long-term

viability of rural areas and communities, the agricultural economic base of the region, and environmental uses for suitable habitat.

This occurs in the Vina subbasin when two RMS wells exceed their MT for two consecutive ~~non-dry~~ years.



Proposed amendments to the Interconnected Surface Water Sustainable Management Criteria, shown as edits to 2022 GSP text, page 160:

3.8.4 Minimum Thresholds

The potential impact of groundwater levels on aquatic habitat or GDEs is typically specific to a certain stream reach or geographic area. Groundwater modeling conducted in association with the HCM (Section 2) incorporates the interaction of surface water and groundwater at a regional scale, including all the GSAs in Butte County. While the model is a useful tool for evaluating regional behavior of the groundwater system overall, there are significant data gaps that limit calibration of the groundwater response in the uppermost layer of the model, where the dynamics and “interconnectedness” between surface water and groundwater actually occur. Therefore, at this time, Groundwater Levels SMC are used by proxy and the MT for interconnected surface water is the same as for groundwater levels:

Two RMS wells within a management area reach their MT for two consecutive years. ~~of non-dry year types.~~

Requested Action

Consider the following action:

Recommend to the Vina GSA Board to amend the Vina GSP to remove references to non-dry year water year types in Sustainable Management Criteria for Groundwater Levels, Groundwater Storage, Water Quality, and Interconnected Surface Water sustainability indicators and document the response to DWR’s Recommended Corrective Action in the Periodic Evaluation.



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, Assistant Director, Butte County Department of Water and Resource Conservation [providing technical staff support to the Vina GSA] and Laura Foglia and Ryan Fulton, Larry Walker Associates

Date: July 16, 2026

Subject: Consideration of Alternatives for Addressing Department of Water Resource's Recommended Corrective Actions and Stakeholder Concerns regarding Groundwater Level Sustainability Indicator Sustainable Management Criteria



Purpose and Requested Action

Staff requests that the Stakeholder Advisory Committee (SHAC) make a formal recommendation to the Vina Groundwater Sustainability Agency (GSA) and Rock Creek Reclamation District GSA Boards on one of two groundwater level Minimum Threshold (MT) alternatives for the 2027 Periodic Evaluation and related Groundwater Sustainability Plan (GSP) amendments.

1. 2022 GSP MTs with Local Management Levels (LML)
2. Change the MTs

Both alternatives use the same broadly supported 2027 Representative Monitoring Site (RMS) network - 29 RMS wells assigned to 26 representative areas - and assign Measurable Objectives (MOs) and 2027 Interim Milestones (IMs) comparable to those adopted in the 2022 GSP (and included in the strawman proposal). The decision before SHAC is whether to add LMLs to the existing MTs or change the current MTs.

These alternatives were developed by staff in response to input received on the Groundwater Level strawman released by the Vina GSA on June 18, 2026 (minor revision posted, 7/9/2026). Available online here: <https://www.vinagsa.org/gsp-periodic-evaluation-plan-amendments>.

Background: DWR Recommended Corrective Action 3

The California Department of Water Resources (DWR) approved the Vina Subbasin GSP in July 2023 and identified Recommended Corrective Actions (RCAs) to be considered as part of the

first Periodic Evaluation. Consideration of adding LMLs or adjusting the existing MTs will allow the GSAs to analyze and address DWR's RCA 3.

Provided below is Recommended Corrective Action 3, as stated in the Determination Letter:

Provide sufficient information regarding criteria used to identify significant and unreasonable conditions, undesirable results, and the potential impacts to various beneficial uses and users of groundwater related to the chronic lowering of groundwater level minimum thresholds. The GSAs should address the following items:

- a. Revise the definition of undesirable results and language pertaining to significant and unreasonable lowering of groundwater level to remove the non-dry year condition or discuss how extractions and recharge will be managed as necessary to ensure that reductions in groundwater levels or storage during dry years are offset by increases in groundwater levels or storage during other years within the sustainable management criteria for the chronic lowering of groundwater levels.*
- b. Provide information on impacts to domestic wells during projected conditions where minimum thresholds are exceeded but undesirable results do not occur and also quantify domestic wells that will be impacted by the proposed minimum threshold. Furthermore, the GSAs should evaluate the impacts of proposed minimum thresholds on other beneficial uses and users, such as public and small water systems and environmental users and users.*
- c. Evaluate how the proposed minimum thresholds for the chronic lowering of groundwater levels may impact other sustainability indicators (e.g., groundwater storage, depletion of interconnected surface water, etc.).*

The revised 2027 RMS network and supporting analyses strengthens the evaluation of potential impacts to various beneficial uses and users of groundwater by creating a network that has smaller polygons and is more representative of conditions and domestic wells within each RMS zone. This provides an improved basis for evaluating impacts of proposed MTs to domestic wells but also to other uses and users of groundwater. The remaining policy decision is whether to develop MTs comparable to the 2022 GSP approach with additional early warning triggers (i.e. Local Management Levels), or use a uniform methodology for all RMS that in most cases is more precautionary and similar to approaches used in nearby subbasins. This alternative would require revising MTs on existing RMS and setting MTs for new RMS using this new methodology. Under either alternative, the second part of 3b can be addressed which is to "evaluate impacts of proposed minimum threshold on other beneficial uses and users..."

Key Considerations

Basin Setting

The Vina Subbasin has a long groundwater-level monitoring record developed through coordination between DWR Northern Region Office (Red Bluff) and Butte County. The record shows a recurring pattern of groundwater-level declines during droughts followed by recovery during wetter periods. Groundwater levels have improved from the historical lows observed during the 2013–2015 and 2020–2022 droughts, and many wells have shown gradual increases in water levels over the past decade.

At the same time, some wells continue to show longer-term declines since approximately 2000, and the subbasin retains a cumulative groundwater-storage deficit compared to relatively “full” aquifer conditions in 2000. Recent wetter years have not fully offset the effects of repeated dry periods over the past two decades. However, the irrigated agricultural footprint in the subbasin has remained stable over the past couple of decades and the subbasin continues to respond to wet and dry cycles. Groundwater extractions fluctuate with hydrologic conditions without showing a sustained increasing trend. These conditions support continued management focused on enhancing recharge where feasible, promoting urban and agricultural water conservation, and using surface water when physically and economically practical. These actions pursued by the GSAs and partnering agencies are intended to reduce groundwater demand and support balanced aquifer conditions over time.

Domestic Wells

The GSAs manage groundwater with the objective of achieving sustainability through avoiding undesirable results. This objective requires GSAs to understand when beneficial uses are impacted, including domestic uses whose use may be affected by MTs set lower than well-bottom elevations. However, an MT is an RMS well specific regulatory threshold used to define when significant and unreasonable conditions may occur; it is not the groundwater level the GSAs seek to maintain and it cannot, by itself, prevent every individual well impact. The GSP’s sustainable yield and Projects and Management Actions show intent to manage groundwater levels toward the MOs, which are substantially above the MTs (average of 62 feet).

The Vina GSA has included funding in Fiscal Year 2026–27 to begin developing a Domestic Well Mitigation Program. Regardless of the MT alternative selected, the program would provide a separate mechanism to assist eligible domestic well users if impacts occur before a basin-wide undesirable result. During and since the last severe drought (2020-2022), when new historical lows were observed in some Vina monitoring wells, approximately 40 domestic wells were reported going dry to the County or through the State’s dry well reporting system. The mitigation program would be designed to respond if groundwater levels decline to the point that individual wells become vulnerable during future droughts. Program eligibility, scope, and long-term funding will require future Board action.

Domestic Well Dataset and Pre-1980 Wells

The well-count tables present results for both all domestic wells on record and wells installed after 1980. Both of these datasets may be relevant to evaluating MTs. Some wells installed before 1980 remain operational and continue to serve residences, so excluding them entirely could underestimate the potential number of wells that could be impacted. At the same time, the historical well-record dataset does not reliably identify whether older wells are still active and therefore well counts could reflect impacts on wells that are not operational. Many pre-1980 wells were likely replaced following the 1976–1977 drought or due to age, condition, or later construction. The 2022 GSP therefore used 1980 as a dataset-refinement proxy to identify wells more likely to remain in use and to reflect more current construction standards. Presenting both counts provides transparency: the all-well count shows the broader potential exposure, while the post-1980 count provides a more practical planning estimate given the limitations of the available well records.

Environmental Uses and Groundwater Dependent Ecosystems

Recent work by Environmental Science Associates and, separately, by The Nature Conservancy advances understanding of groundwater dependent ecosystems (GDEs), ecological sensitivity, and priority GDEs in the Vina Subbasin. The analyses also confirm that important questions remain. In particular, the relationship between pumping and groundwater levels in the principal aquifer, shallow or perched groundwater, and vegetation health is not

sufficiently understood to establish a locally validated ecological threshold. Vegetation condition is also influenced by precipitation, soil moisture, surface water, irrigation, pests, and other factors.

A logical next step under either MT alternative for continued consideration of GDEs is a coordinated monitoring program that establishes fixed vegetation baseline locations and tracks ecological condition together with shallow (or perched) groundwater levels. This would improve the ability to distinguish groundwater-related effects from other causes of vegetative decline and support future adaptive management. The PE will refer to these studies in its description of new information available to the GSAs. The GSAs may consider inclusion of new monitoring programs to address these remaining data gaps.

Chico Urban Forest

The Chico urban forest is not fully represented by regional GDE mapping and may rely on a combination of shallow groundwater, perched water, creek recharge, irrigation, and/or urban infrastructure leakage. A focused monitoring effort developed with the City of Chico and other partners could track tree condition and shallow groundwater over time and provide a stronger basis for future management decisions. It is worth noting that the difference between the MO and MT in the Chico Management Area is an average of 18 feet, considerably less than in the other two management areas.

Inter-basin Coordination

The North Sacramento River Corridor Joint GSP evaluation found that neighboring subbasins used different MT methodologies, creating potential concern where threshold levels differ significantly near shared boundaries. Vina MTs are currently up to 60 feet lower than those in Corning and 25-59 feet lower than along the boundary with the Butte Subbasin. The same evaluation found that Vina MOs near the Corning and Butte boundaries are generally within about 15 feet and 10 feet, respectively, of neighboring MOs. This similarity makes the Vina GSP framework of managing toward the MO rather than allowing groundwater levels to decline toward the MT important for inter-basin coordination considerations. The Vina GSP sustainable yield and projects and management actions were developed to stabilize long-term groundwater levels around the MOs through recharge, irrigation efficiency, and other conservation and demand-reduction efforts. Continued inter-basin coordination and the coordinated interconnected surface water effort planned for the next five-year implementation period will provide additional information about boundary conditions and potential cross-boundary effects.

Adaptive Management and Future Refinement

The 2022 GSP acknowledges and describes data gaps relevant to the GSAs' management of the subbasin and describes an adaptive management approach. As stated in the Preface of the GSP, "ongoing management of the Subbasin under the GSP will follow an "adaptive management" strategy that involves active monitoring of Subbasin conditions and addressing any challenges related to maintaining groundwater sustainability by scaling and implementing projects and management actions (PMAs) in a targeted and proportional manner in accordance with the needs of the Subbasin...GSP annual reports provide an opportunity each year to review current Subbasin conditions. Using annual reporting information, the Vina GSA and Rock Creek Reclamation District GSA Boards can assess the need for further PMAs."

The GSAs continue to adaptively manage the Subbasin and reconsider aspects of the GSP as needed as additional monitoring data, stakeholder input, regional coordination, and DWR feedback become available. Each 5-year periodic evaluation requires the GSAs to self-assess implementation considering current conditions and new information and is an opportunity to respond and revisit plan elements, monitoring, and projects and management actions as

needed. It is also an opportunity for DWR to issue a new determination of plan approval, incomplete, or inadequate given conditions and implementation of the GSP.

Alternatives for SHAC Consideration

In light of the above key considerations and the ongoing divergent perspectives of stakeholders around either maintaining existing MTs or raising MTs, staff is providing two alternatives for the SHAC's consideration:

Alternative 1 - Retain Comparable 2022 MTs and add Local Management Levels to a subset of RMS wells

Consistent with the groundwater level strawman, Alternative 1 carries forward adopted 2022 GSP MTs for existing RMS wells and applies the comparable 2022 methodology described in the groundwater level strawman to newly designated RMS wells for MT, MOs, and IMs. This alternative adds non-regulatory LMLs set 15 feet below the applicable MO as an early-warning trigger for a subset of RMS wells, as described further below. Groundwater levels persistently reaching an LML would prompt consideration of appropriate adaptive management actions by the GSA Boards which could include increased monitoring, investigation into impacts and causes, or activation of a GSP project or management action. "Persistently reaching" means multiple observed groundwater level measurements across differing seasons (i.e. spring, summer, fall) are observed at the LML.

LMLs are assigned to a subset of the RMS wells with an approach that includes more wells than proposed in the original strawman for three purposes:

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)

Fourteen RMS wells are assigned an LML.

This alternative retains the 2022 GSP MT regulatory framework and adds earlier local management triggers at selected locations, providing an early-warning tool to support adaptive management.

Alternative 2 - Revise MTs Using 5% Domestic Well Risk and Historical Lows

Alternative 2 presents adjusted MTs using a new methodology for all RMS wells in the north and south management areas, similar to the approach documented in the Wyandotte Creek draft amended GSP. For each RMS representative area, the MT would be set at the lower groundwater elevation (the deeper threshold) produced by the following two methods:

1. The historical low groundwater elevation minus 20 feet; or
2. The groundwater elevation at which 5 percent of domestic wells would be at risk, using the ground-surface-elevation adjustment.

MTs for the Chico Management Area RMS wells remain unchanged from the 2022 GSP. The 2022 GSP MOs and IMs remain unchanged (consistent with what was presented in the groundwater level strawman), and LMLs are not added. The dual-criterion structure for establishing the MT is modeled on the draft Wyandotte Creek amended GSP and is similar to

neighboring subbasin approaches (Butte, Corning, Colusa, and Los Molinos) that use historical lows with a buffer and/or domestic well depth percentages. In several RMS polygons, this change would notably raise the MT levels and reduce the projected number of domestic wells at risk at MT levels. In most others, it provides a similar level of protection. Using this MT methodology also results in 8 RMS wells having a lower MT than the 2022 MT alternative (generally in polygons that have few domestic wells). The MT adjustments have limited benefits for reducing the discrepancy between MT levels between subbasin boundaries with Corning and Butte. The increased MT level in most polygons may result in MT violations and/or management responses sooner, including in circumstances where observed impacts have not yet been shown to be significant and unreasonable.

Actions Common to Both Alternatives

Selection of either alternative would be accompanied by continued work to:

1. Develop the Vina GSA Domestic Well Mitigation Program, beginning in 2027;
2. Implement recharge, irrigation-efficiency, conservation, and other projects and management actions intended to maintain groundwater levels near the MOs; and
3. Continue inter-basin coordination and coordinated interconnected surface water analysis during the next five-year implementation period.

Requested Recommendation

SHAC is requested to recommend Alternative 1 or Alternative 2 to the Vina GSA and Rock Creek Reclamation District GSA Boards and identify any specific modifications that should accompany its recommendation. The SHAC is also asked to consider whether the change should be made as an amendment to the GSP or only described in the Periodic Evaluation.

The GSA Boards will make the final policy and amendment decisions.

Attachments

- A. Alternative 1 and 2 Summary Comparison Table**
- B. Tables, Maps, and Hydrographs for Alternative 1 and 2**
- C. Summary of Stakeholder feedback received on the Groundwater Level Strawman**

Attachment A: Alternative 1 and 2 Summary Comparison

Issue / Concern	Alternative 1: Existing MTs with LMLs	Alternative 2: Revised MTs
MT framework	Retains 2022 GSP MTs for existing wells and MTs for new RMS wells will be based on criteria comparable to that used for 2022 MTs. Adds LMLs to a subset of the RMS wells at 15 feet below the MO.	Revises each MT to the deeper of historical low minus 20 feet or the elevation associated with 5 percent of domestic wells at risk. No LMLs.
DWR Recommended Corrective Action 3	Uses the expanded network, documents beneficial-user impacts, and adds early local triggers while maintaining the existing 2022 MT framework.	Uses the expanded network and documents impacts with revised, generally more precautionary MTs in most RMS polygons.
Domestic wells	Relies on management toward the MO, selected LMLs, and the separate mitigation program. Low MTs may continue to create concern about theoretical well impacts – largely a public perception challenge	Uses domestic well risk directly in the MT calculation and generally reduces the number of estimated wells potentially at risk at MT. Also relies on management toward the MO and mitigation remains necessary for individual impacts.
GDEs and Chico urban forest	Adds LMLs at selected shallow/GDE wells and supports monitoring and adaptive management. Does not establish specific ecological MTs.	Provides revised MTs, but no local trigger. Monitoring is still needed because MTs are not established based on measured vegetation response.
Inter-basin coordination	Adds LMLs at subbasin boundary wells which more closely align with neighboring thresholds. Relies on management toward aligned MOs, continued coordination, and the regional coordinated interconnected surface water effort.	Adjusts MT methodology similar to neighboring approaches however limited value in reducing threshold differences at boundaries; continued coordination is still needed, particularly regarding interconnected surface water.
Regulatory and implementation effect	Preserves existing flexibility and avoids premature regulatory action given the uncertainty regarding when Undesirable Results would occur if levels were to decline between the MO toward the MT. LMLs are non-regulatory yet add monitoring and response expectations at selected wells.	Creates an earlier regulatory trigger in most RMS wells, increasing the likelihood of exceeding MTs, and may affect future implementation. May prompt exceedances and resulting action before impacts are confirmed as significant and unreasonable.

Attachment B. Tables, Maps and Hydrographs for Alternative 1 and 2

Table 1. Proposed 2027 RMS wells in Vina Subbasin (explore the network on the [Dashboard](#))

Index	RMS Well	RMS Well: State Well Number	Site Code	MA	Latitude	Longitude	Well Depth (ft)	Top Perforation (ft bgs) ²	Bottom Perforation (ft bgs) ²
1	25C001M	23N02W25C001M	398222N1220401W001	North	39.8222	-122.04	243		
2	09E001M	23N01W09E001M	398651N1219930W001	North	39.8651	-121.993	110		
3	20K001M	22N01E20K001M	397445N1218905W001	North1	39.7445	-121.891	110		
4	05M001M	22N01W05M001M	397871N1220100W001	North	39.78711	-122.01	200		
5	28M004M	23N01W28M004M	398188N1219912W003	North	39.81877	-121.991	207	120	165
6	10M001M	23N01W10M001M	398619N1219746W001	North	39.86194	-121.975	220	90	200
7	27L001M	23N01W27L001M	398180N1219669W001	North	39.818	-121.967	102	65	102
8	07H001M	23N01E07H001M	398648N1219049W002	North	39.86482	-121.905	195	115	195
9	14R002M	23N01W14R002M	398411N1219399W001	North	39.84105	-121.94	183		
10	36P001M	23N01W36P001M	397972N1219297W001	North	39.7972	-121.93	165		
11	29P002M	23N01E29P002M	398133N1218913W001	North	39.81332	-121.891	265		
12	33A001M	23N01E33A001M	398097N1218630W001	North1	39.8097	-121.863	506	53	506
13	09B001M	22N01E09B001M	397818N1218718W001	North1	39.7818	-121.872	156	84	156
14	CWSCH01b		397284N1218374W001	Chico	39.72849	-121.838	>600		
15	CWSCH02		397284N1218374W002	Chico	39.72849	-121.838	>600		
16	CWSCH03		397284N1218374W003	Chico	39.72849	-121.838	>600		
17	CWSCH07		397284N1218374W004	Chico	39.72849	-121.838	<600		
18	10B003M	21N01E10B003M	396963N1218486W001	South	39.6963	-121.849	525	320	503
19	27D001M	21N01E27D001M	396511N1218607W001	South	39.6511	-121.861	112		
20	13L004M	21N01E13L004M	396735N1218144W003	South	39.67348	-121.814	353	240	340
21	25K001M	21N01E25K001M	396420N1218128W001	South	39.642	-121.813	93		
22	02H003M	20N01E02H003M	396158N1218221W001	South	39.61576	-121.822	201	70	180
23	24C001M	20N02E24C001M	395812N1217026W001	South	39.5812	-121.703	155	124	134
24	18C003M	21N02E18C003M	396820N1217970W003	South	39.682	-121.797	240	130	200
25	32E001M	21N02E32E001M	396339N1217845W001	South	39.63383	-121.785	184	62	92
26	26E006M	21N02E26E006M	396468N1217263W004	South	39.6468	-121.726	179	105	150
27	09G001M	20N02E09G001M	396154N1217391W001	South	39.61546	-121.739	202	130	180
28	32B001M	21N03E32B001M	396396N1216634W001	South	39.63958	-121.663	57	13	57
29	33L001M	20N03E33L001M	395435N1216466W001	South	39.54357	-121.647	101	13	101

1. RMS well is physically located in Chico MA but is representative of a portion of North MA.

2. Units corrected, rev 8.5.2026

Table 2. 2027 Representative Monitoring Site (RMS) Wells and Sustainable Management Criteria (SMC) including Measurable Objectives (MO) and 2027 Interim Milestones (IM)

Index	RMS Well	MA	MO	2027 IM	SMC Source ²	Average GWL (ft amsl)
1	23N02W25C001M	North	130	130	2022 GSP	141
2	23N01W09E001M	North	135	136	Comparable	159
3	22N01E20K001M	North ¹	115	117	Comparable	139
4	22N01W05M001M	North	115	116	2022 GSP	138
5	23N01W28M004M	North	118	120	Comparable	142
6	23N01W10M001M	North	138	140	Comparable	162
7	23N01W27L001M	North	121	123	Comparable	145
8	23N01E07H001M	North	136	140	2022 GSP	165
9	23N01W14R002M	North	132	134	Comparable	156
10	23N01W36P001M	North	108	110	2022 GSP	143
11	23N01E29P002M	North	127	129	Comparable	152
12	23N01E33A001M	North ¹	125	128	2022 GSP	147
13	22N01E09B001M	North ¹	113	115	Comparable	138
14	CWSCH01b	Chico	106	107	2022 GSP	131
15	CWSCH02	Chico	105	108	2022 GSP	132
16	CWSCH03	Chico	108	109	2022 GSP	129
17	CWSCH07	Chico	95	97	2022 GSP	115
18	21N01E10B003M	South	92	94	Comparable	123
19	21N01E27D001M	South	84	87	Comparable	114
20	21N01E13L004M	South	82	85	Comparable	110
21	21N01E25K001M	South	83	85	Comparable	113
22	20N01E02H003M	South	73	75	Comparable	103
23	20N02E24C001M	South	77	81	2022 GSP	112
24	21N02E18C003M	South	130	132	2022 GSP	157
25	21N02E32E001M	South	87	89	Comparable	119
26	21N02E26E006M	South	95	97	2022 GSP ³	110
27	20N02E09G001M	South	87	89	Comparable	117
28	21N03E32B001M	South	195	197	Comparable	225
29	20N03E33L001M	South	87	90	Comparable	118

1. RMS well is located within Chico Management Area (MA) but is representative of a portion of North MA.
2. Wells with source 'Comparable' are calculated by (1) calculating average spring groundwater level, (2) calculating average difference between 2022 RMS wells' average spring groundwater levels and SMCs, and (3) taking the difference between calculations (1) and (2).
3. 2022 GSP included 26E005. 26E006 has been selected to be more representative, but the same 2022 GSP SMC are assigned.

Table 3. Minimum Thresholds (MT) and domestic well counts per RMS zone with well depths above the MT for Alternative 1 – 2022 GSP MTs + Local Management Levels (LMLs) and Alternative 2- Revised MTs

Index	RMS Well	MA	Alternative 1: 2022 MTs + LMLs		Alternative 2: Revised MTs	Difference in MT Elevation (ft): Alt 1 minus Alt 2	Total Domestic Wells	Count of Domestic Wells Above MT ²		Difference
			LML	MT (ft amsl)	MT (ft amsl) ³			Alternative 1	Alternative 2	
1	23N02W25C001M	North	115	50	83	-33	6	2	0	2
2	23N01W09E001M	North	120	68	86	-18	12	5	1	4
3	22N01E20K001M	North ¹	100	48	44	4	108	4	5	-1
4	22N01W05M001M	North	100	31	30	1	1	0	0	0
5	23N01W28M004M	North		51	53	-2	6	1	0	1
6	23N01W10M001M	North		71	53	18	7	0	0	0
7	23N01W27L001M	North	106	55	57	-2	15	1	1	0
8	23N01E07H001M	North		72	123	-51	32	12	2	10
9	23N01W14R002M	North		66	106	-40	30	9	2	7
10	23N01W36P001M	North	93	45	38	7	53	2	3	-1
11	23N01E29P002M	North	112	61	78	-17	239	59	12	47
12	23N01E33A001M	North ¹		72	93	-21	88	17	4	13
13	22N01E09B001M	North ¹		46	46	0	12	1	1	0
14	CWSCH01b	Chico		85 ⁴	85	0	387	35	35	0
15	CWSCH02	Chico								
16	CWSCH03	Chico								
17	CWSCH07	Chico								
18	21N01E10B003M	South	77	30	51	-21	105	33	5	28
19	21N01E27D001M	South	69	23	26	-3	61	4	3	1
20	21N01E13L004M	South		21	39*	-18	28	11	5	6
21	21N01E25K001M	South		21	57*	-36	27	6	3	3
22	20N01E02H003M	South	58	11	13	-2	15	3	1	2
23	20N02E24C001M	South	62	18	15	3	7	0	0	0
24	21N02E18C003M	South		65	87	-22	92	10	5	5
25	21N02E32E001M	South	72	25	58	-33	110	43	6	37
26	21N02E26E006M	South		36	73	-37	20	8	1	7
27	20N02E09G001M	South	72	25	18	7	2	0	0	0
28	21N03E32B001M	South		133	47	86	7	0	0	0
29	20N03E33L001M	South	72	26	12	14	2	0	0	0

Subbasin Total	1472	266	95	171
Vina North Total	609	113	31	82
Chico Total	387	35	35	0
Vina South Total	476	118	29	89

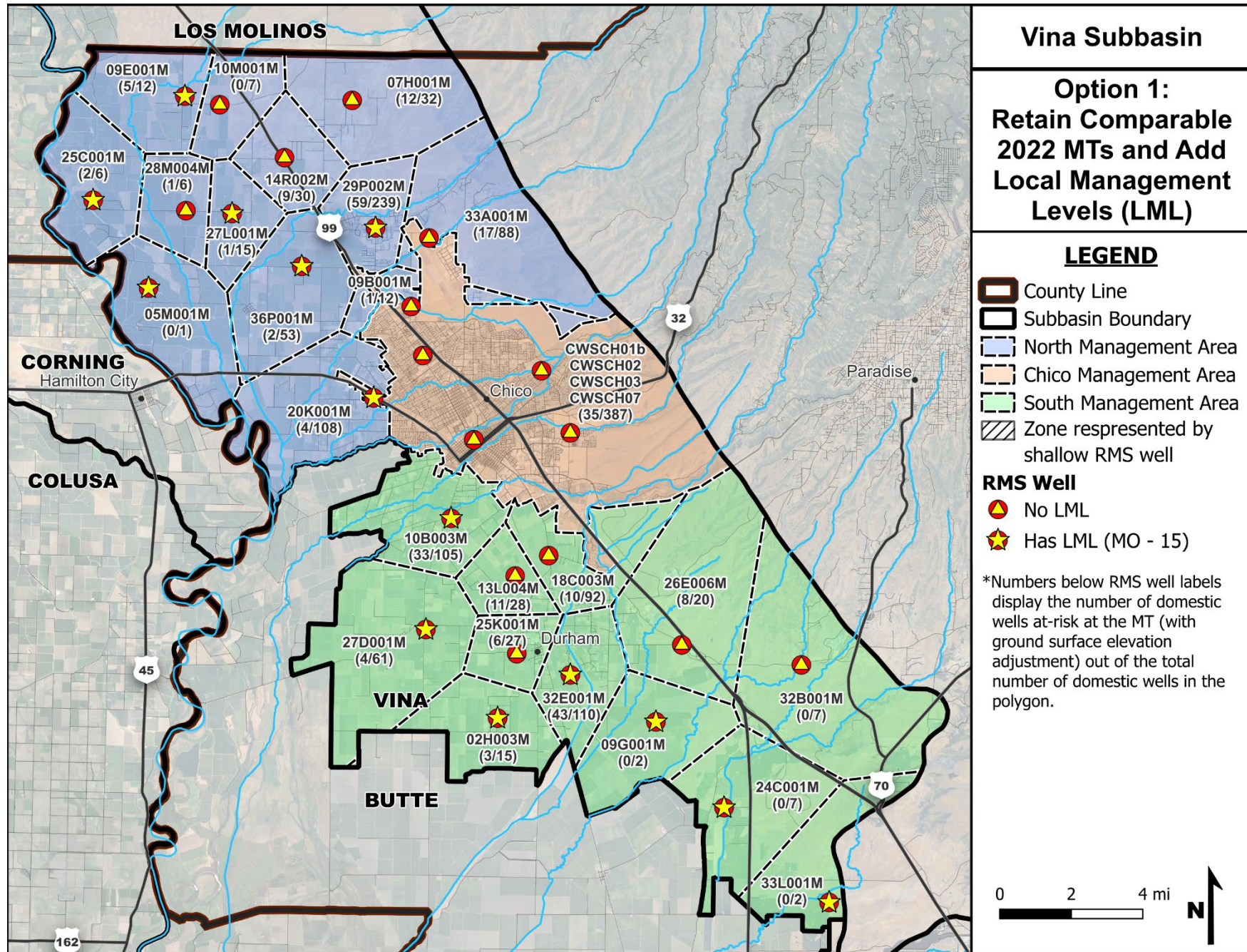
1. RMS well is located within Chico Management Area (MA) but is representative of a portion of North MA.
2. Using post-1980 dataset, well counts show estimates of how many domestic wells would have well-bottom elevations above the applicable ground surface elevation adjusted MT under the hypothetical at-MT condition if groundwater levels were at the MT level in each polygon.
3. Alternative 2 MT criteria – all RMS wells use 5% domestic wells at-risk criteria with the exception of two wells noted with *
4. RMS wells in the Chico Management Area retain 2022 GSP MTs under both alternatives.

Table 4. Subbasin-wide well counts for Alternative 1 and 2 MT for differing well types including domestic, industrial, irrigation and public supply for both pre and post 1980.

Well Type	Total Number of WCRs ¹	Wells at-risk at MT Level		Wells installed since 1980 ²	Wells at-risk at MT Level (Post-1980)	
		Alternative 1	Alternative 2		Alternative 1	Alternative 2
Domestic	4341	1397	996	1472	266	95
Industrial	64	13	13	25	2	2
Irrigation	1651	108	90	527	14	8
Public Supply	114	4	4	45	0	0
TOTAL³	6170	1522	1103	2069	282	105

1. Represents all Well Completion Reports (WCRs) in the Vina Subbasin as of 7/14/2026
2. Domestic well dataset was refined using the domestic well inventory and was further narrowed down by:
 - A. Removing old wells installed on the same parcel as a newer well
 - B. Removing wells that are shallower than the historical minimum of the nearest RMS well
3. Totals do not include wells identified with well type 'Monitoring' or 'Unknown/Other'

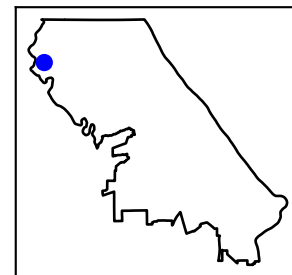
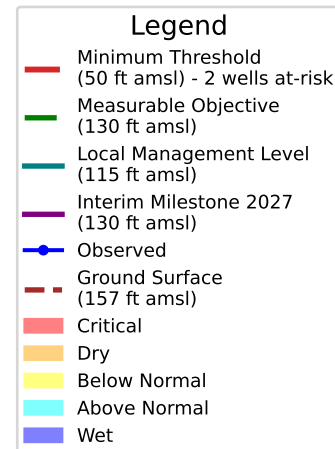
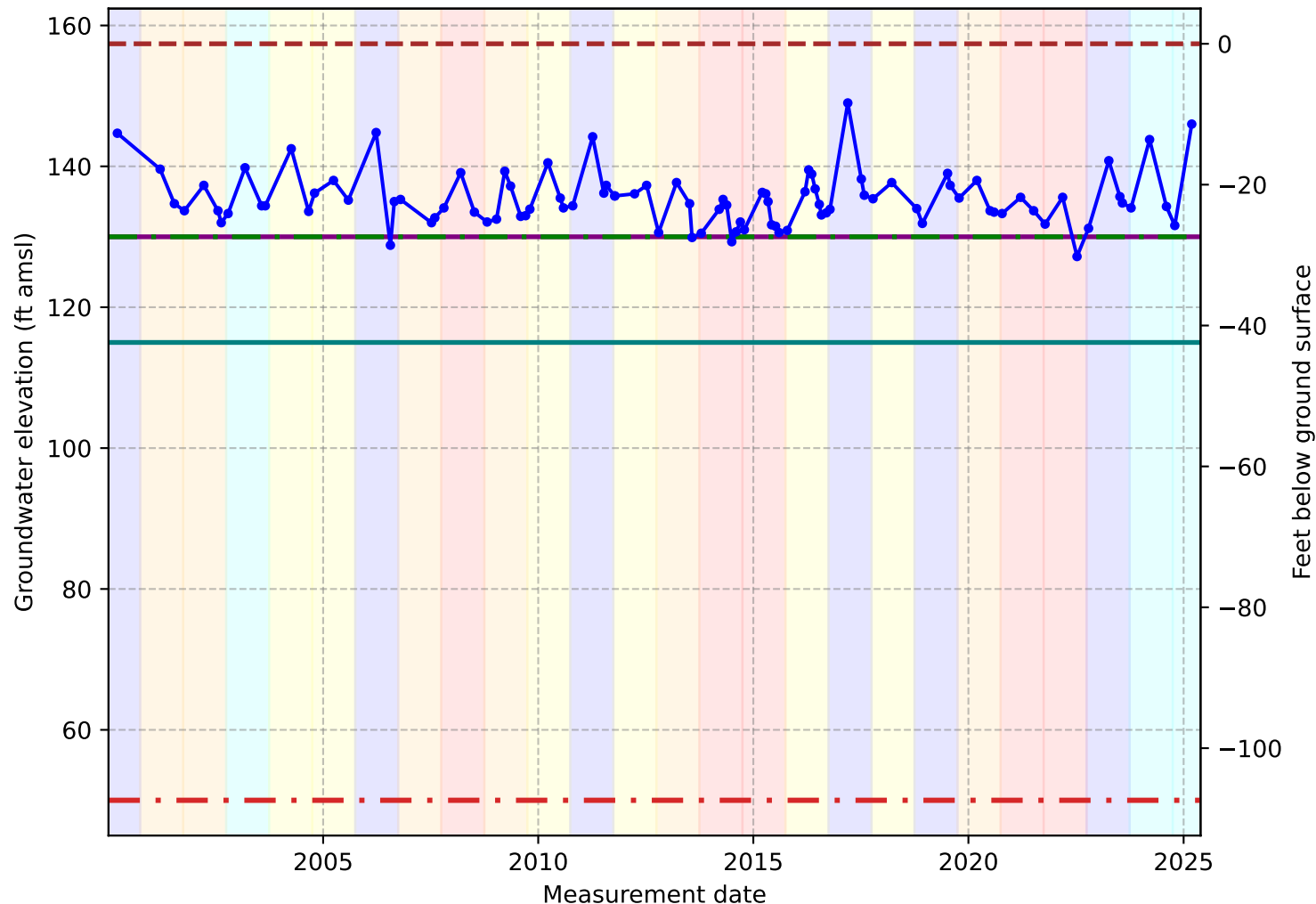
Alternative 1: 2022 GSP SMC and Local Management Levels



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

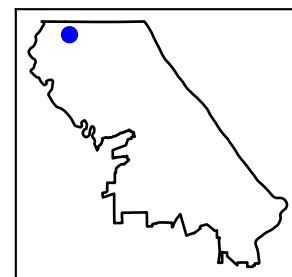
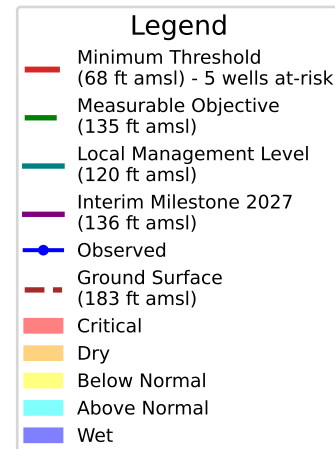
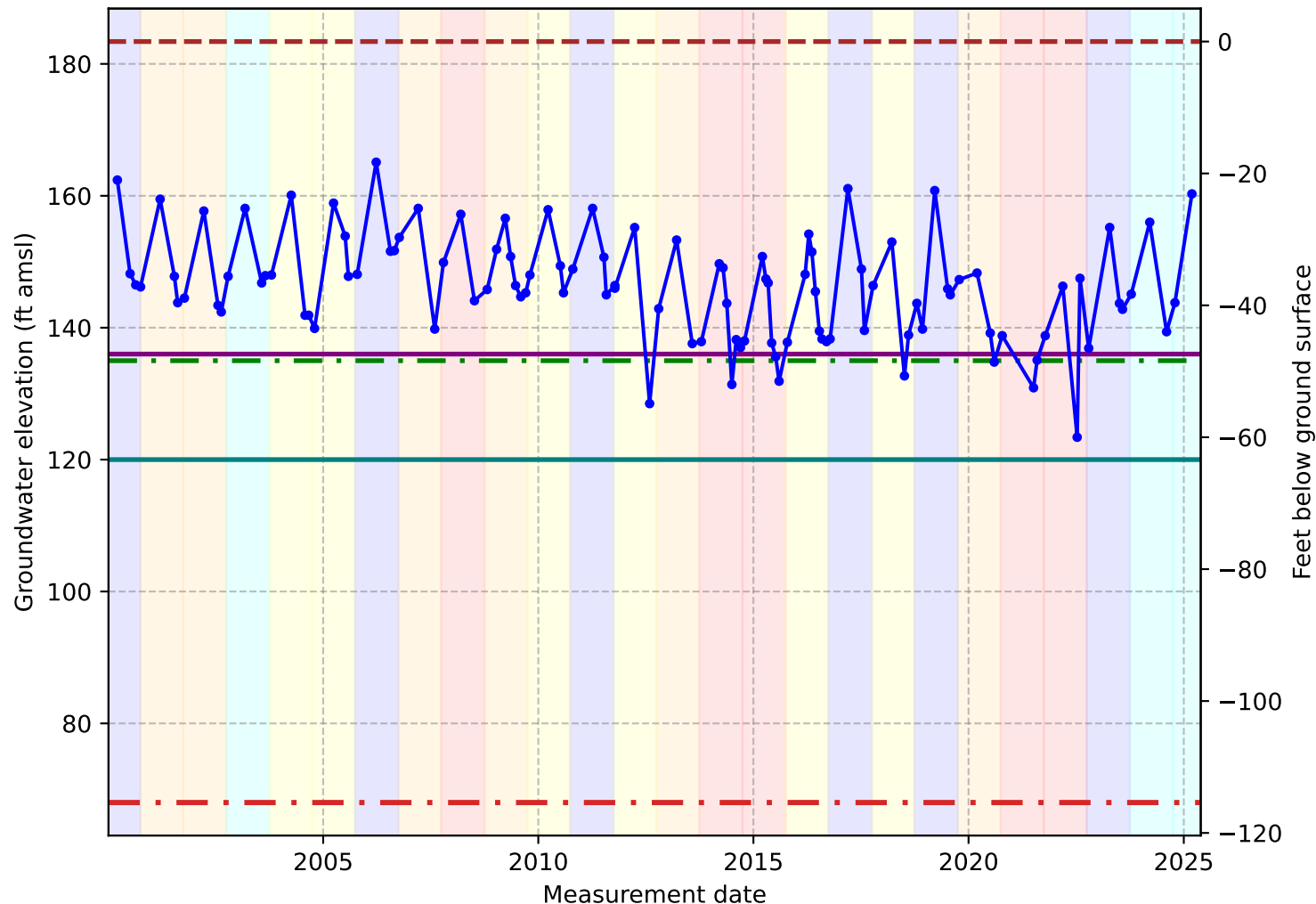
Total Number of Domestic Wells = 6

Alternative 1
2022 MT + LML



Vina Subbasin - State Well Number (SWN): 23N01W09E001M
Total Number of Domestic Wells = 12

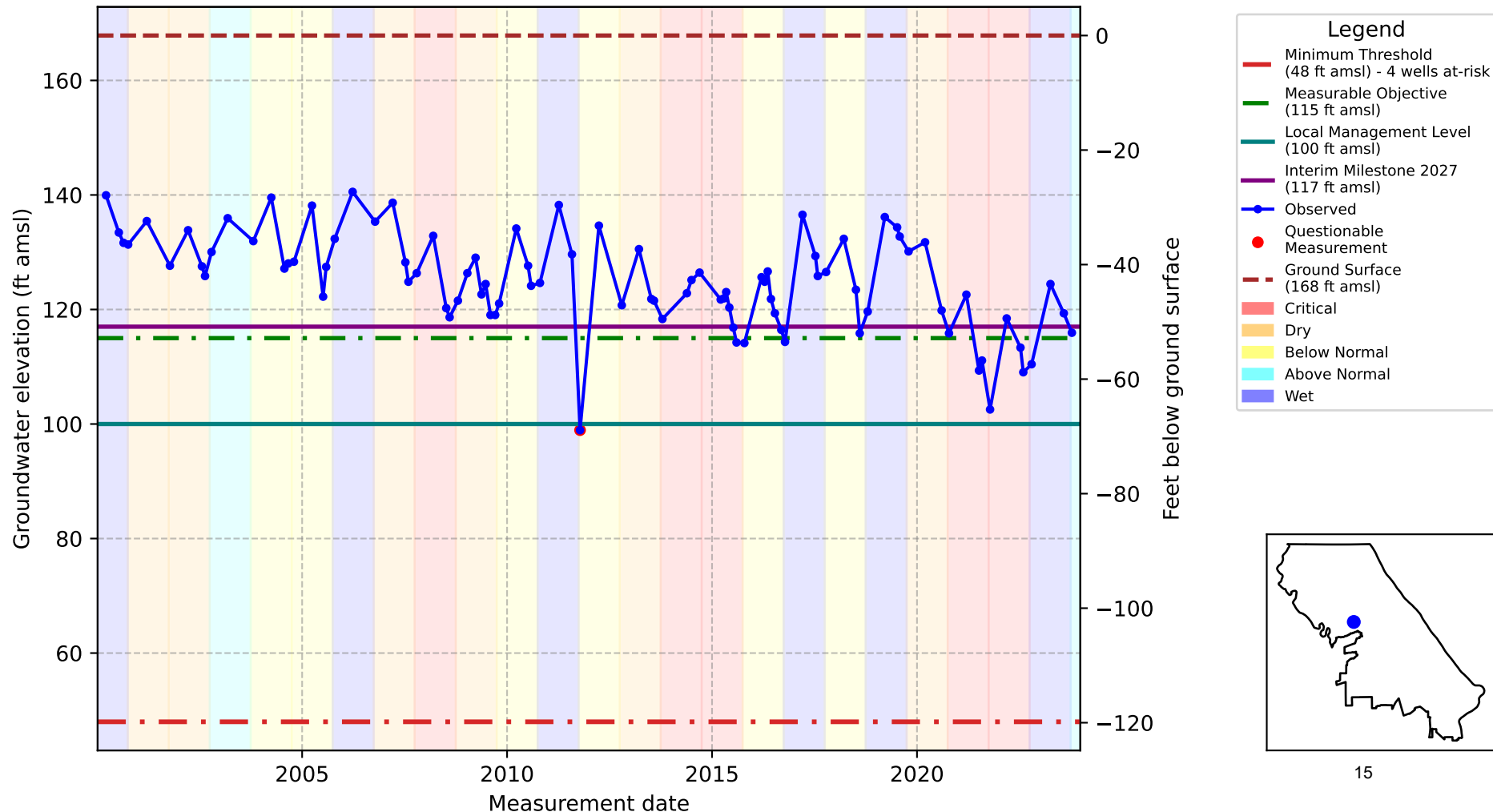
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 108

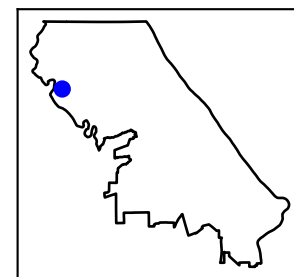
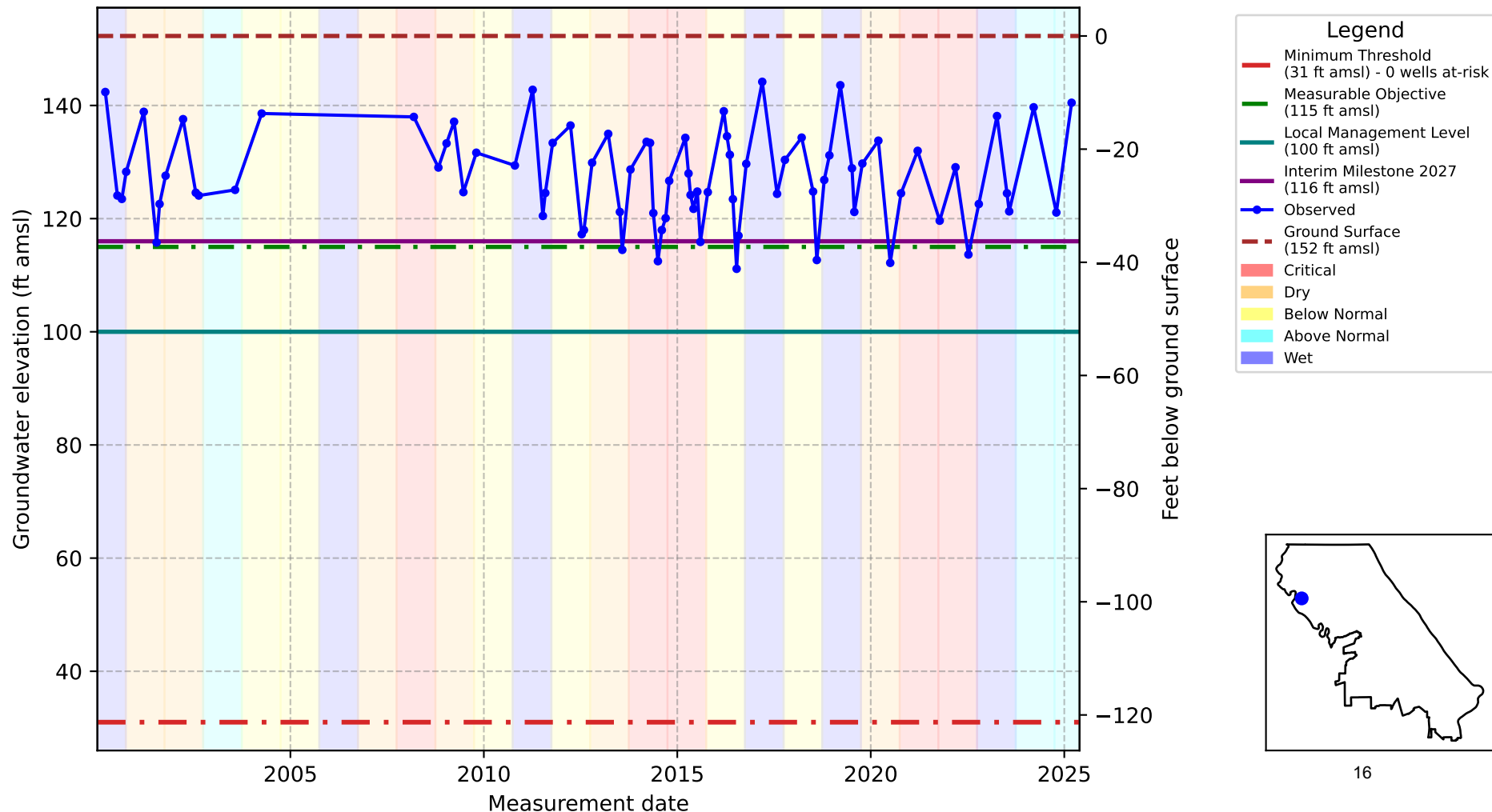
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 1

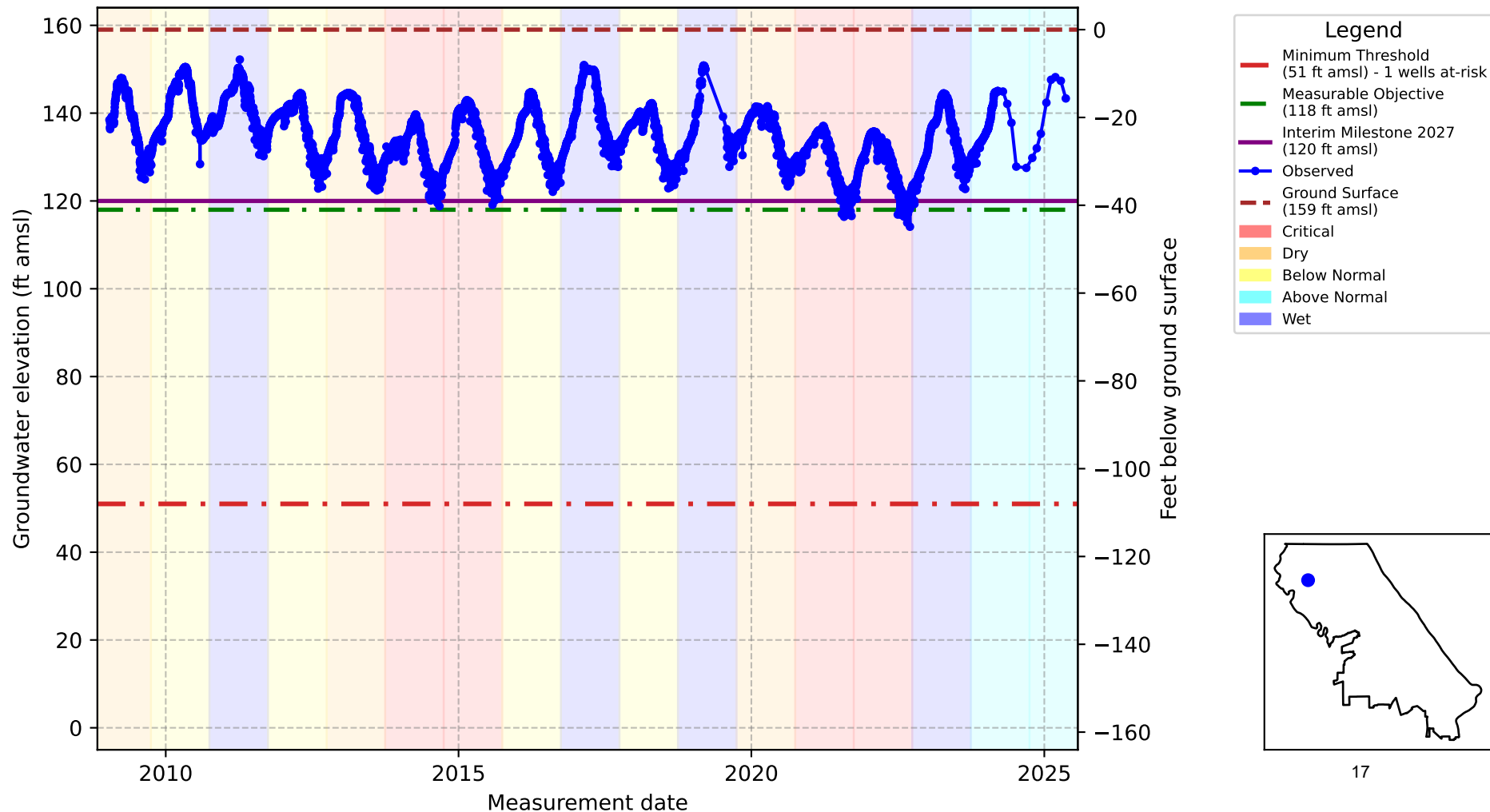
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 6

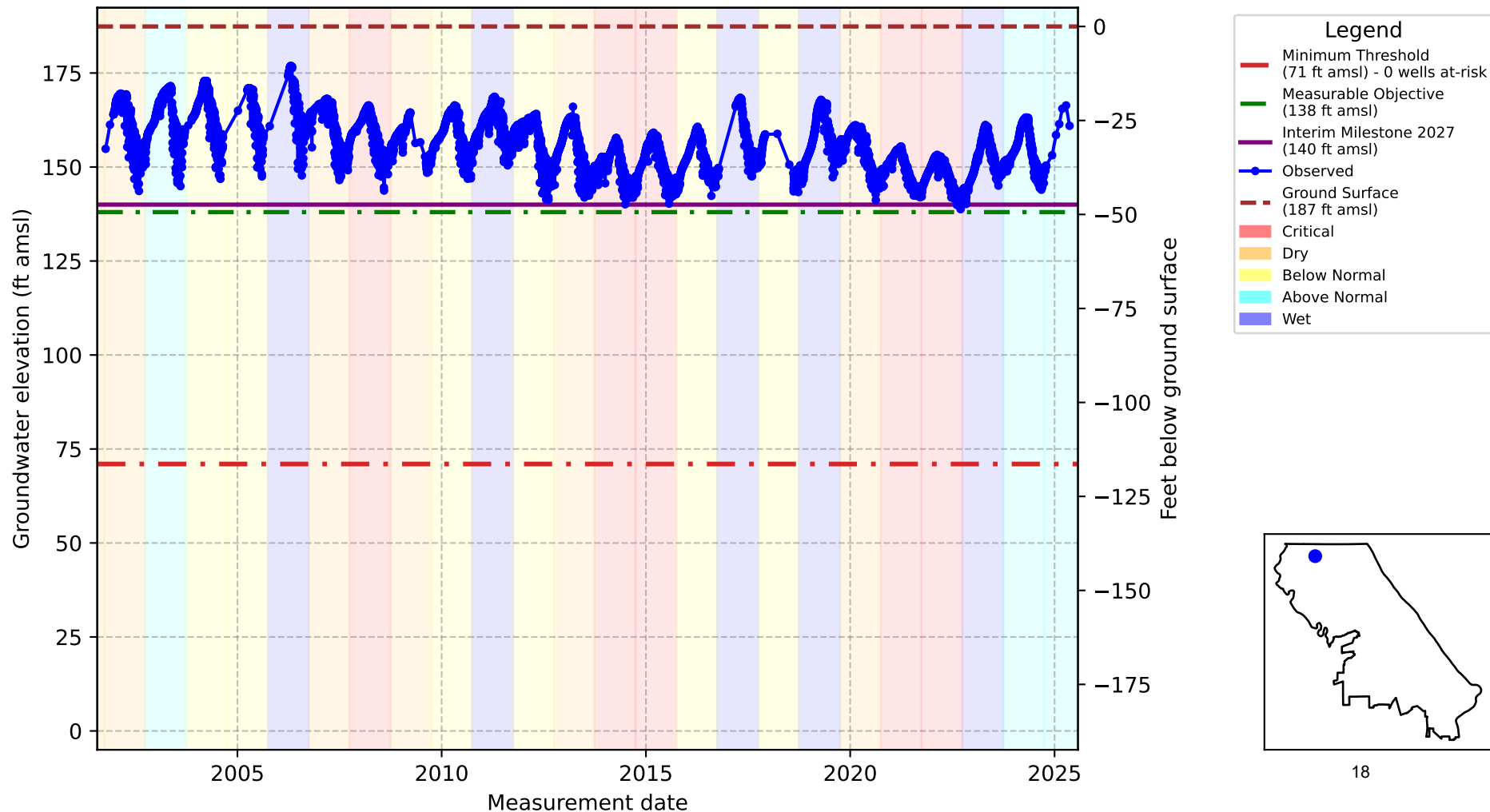
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 7

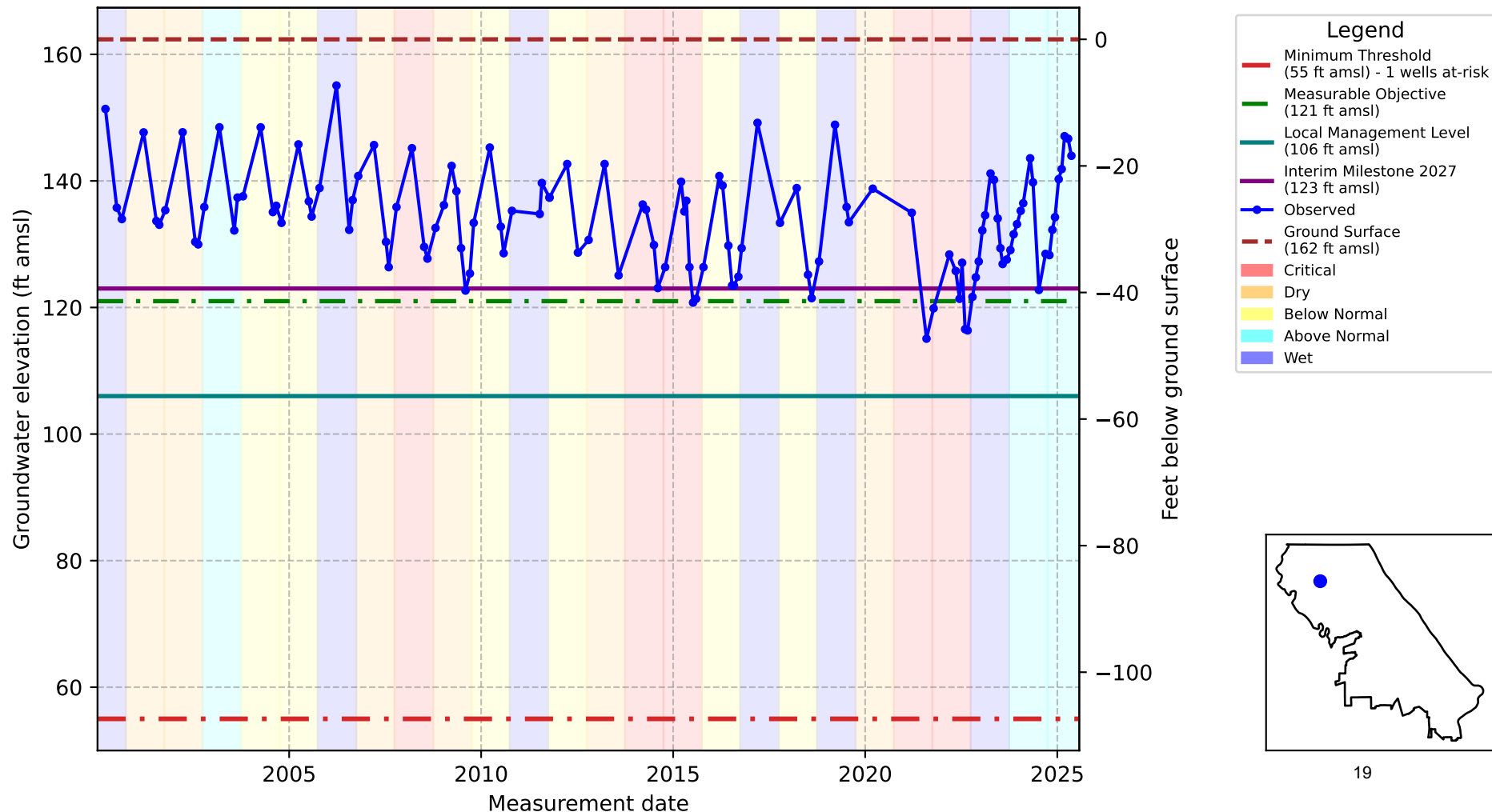
Alternative 1
2022 MT + LML



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

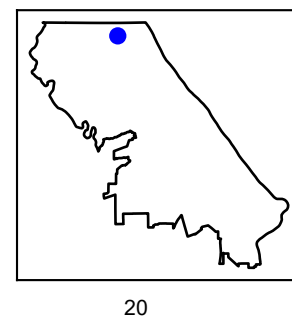
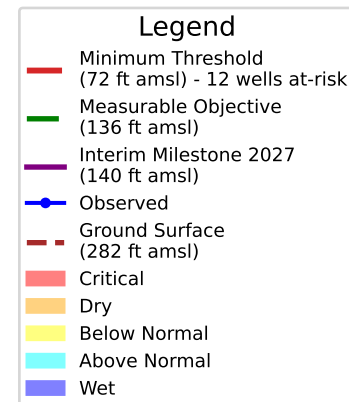
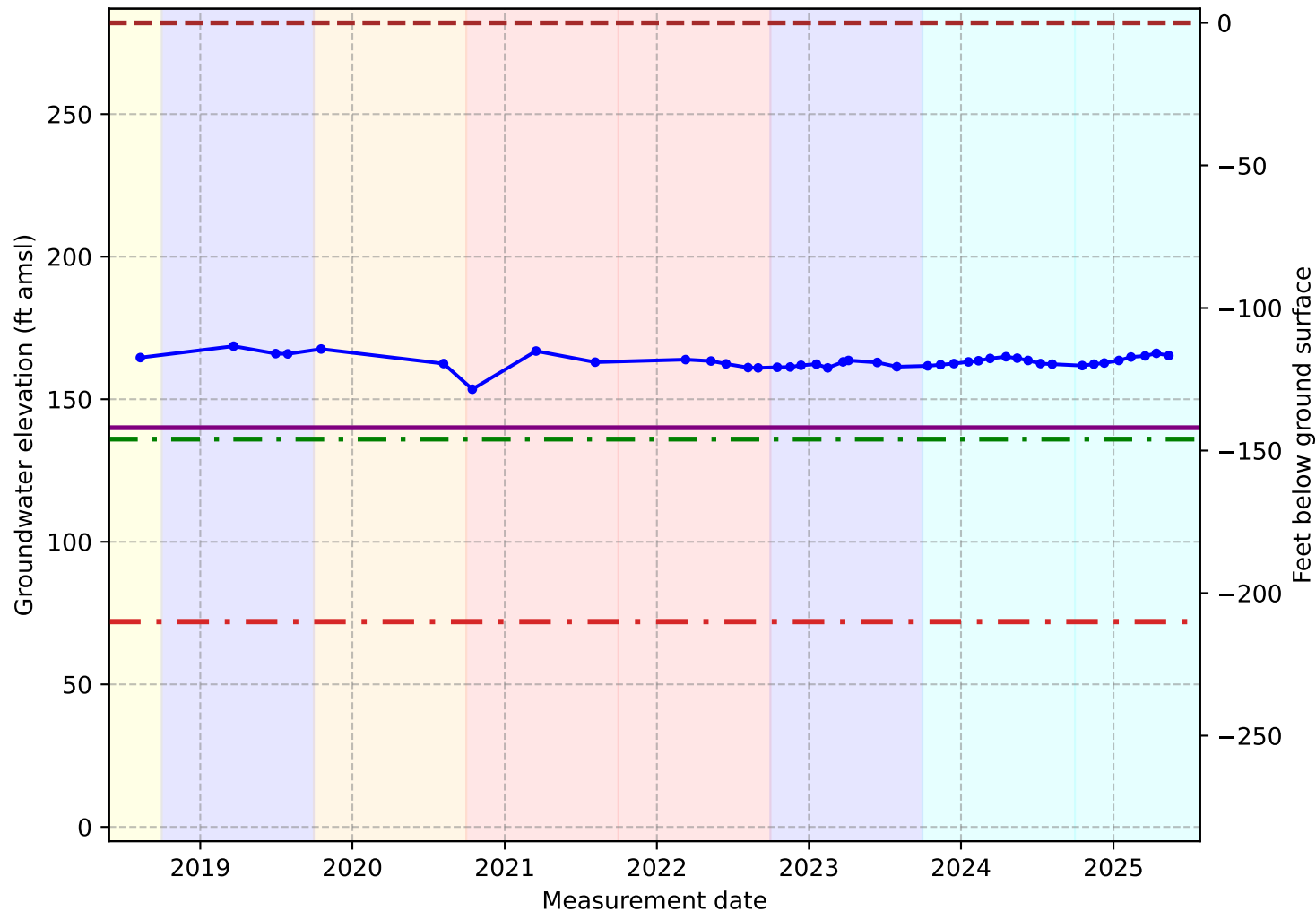
Total Number of Domestic Wells = 15

Alternative 1
2022 MT + LML



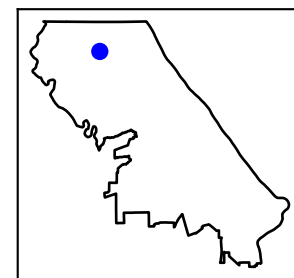
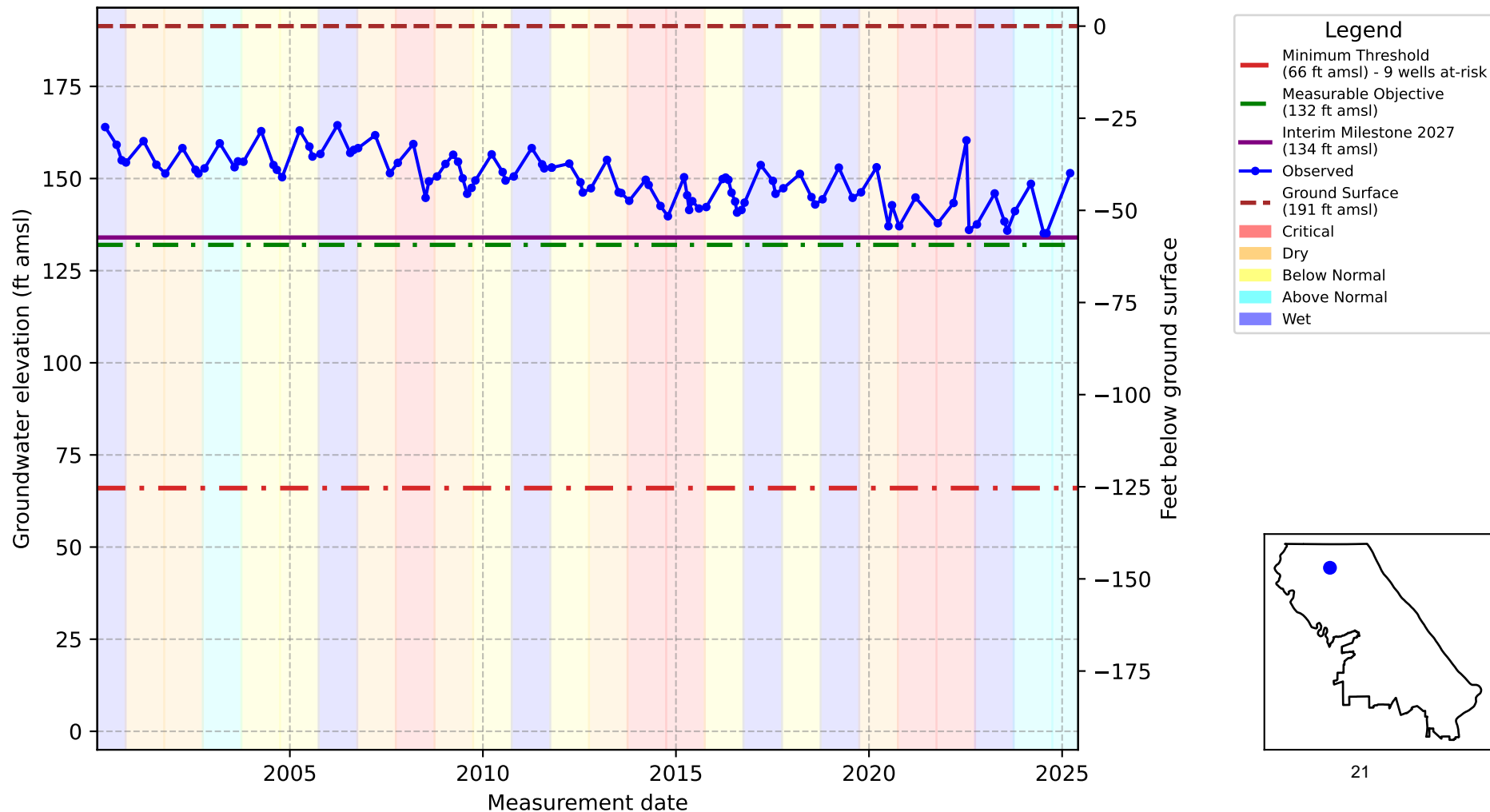
Vina Subbasin - State Well Number (SWN): 23N01E07H001M
Total Number of Domestic Wells = 32

Alternative 1
2022 MT + LML



Vina Subbasin - State Well Number (SWN): 23N01W14R002M
Total Number of Domestic Wells = 30

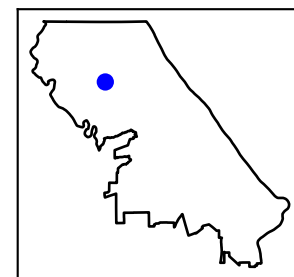
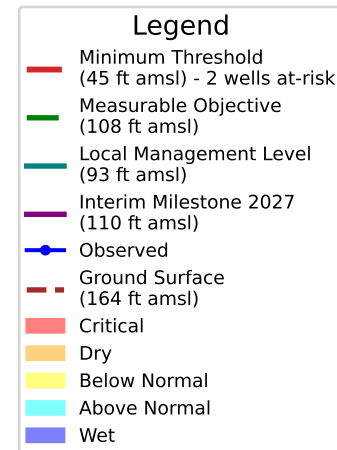
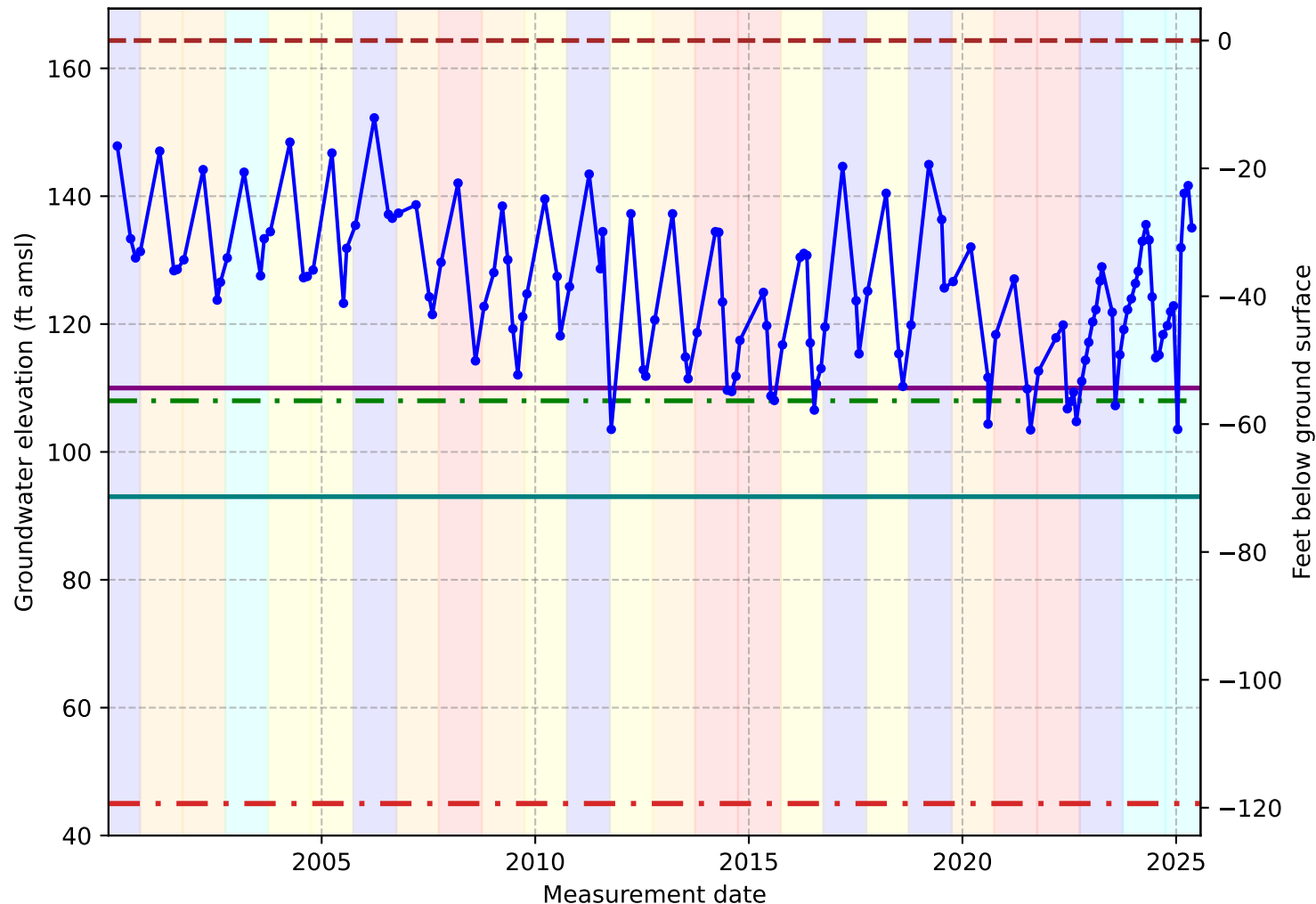
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 53

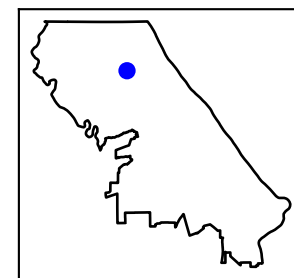
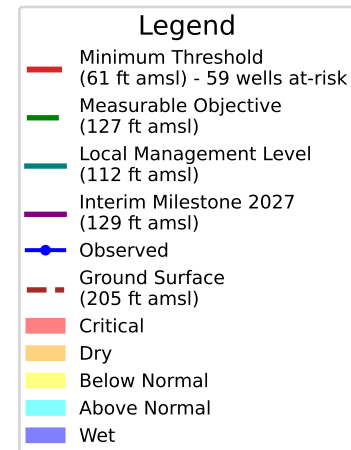
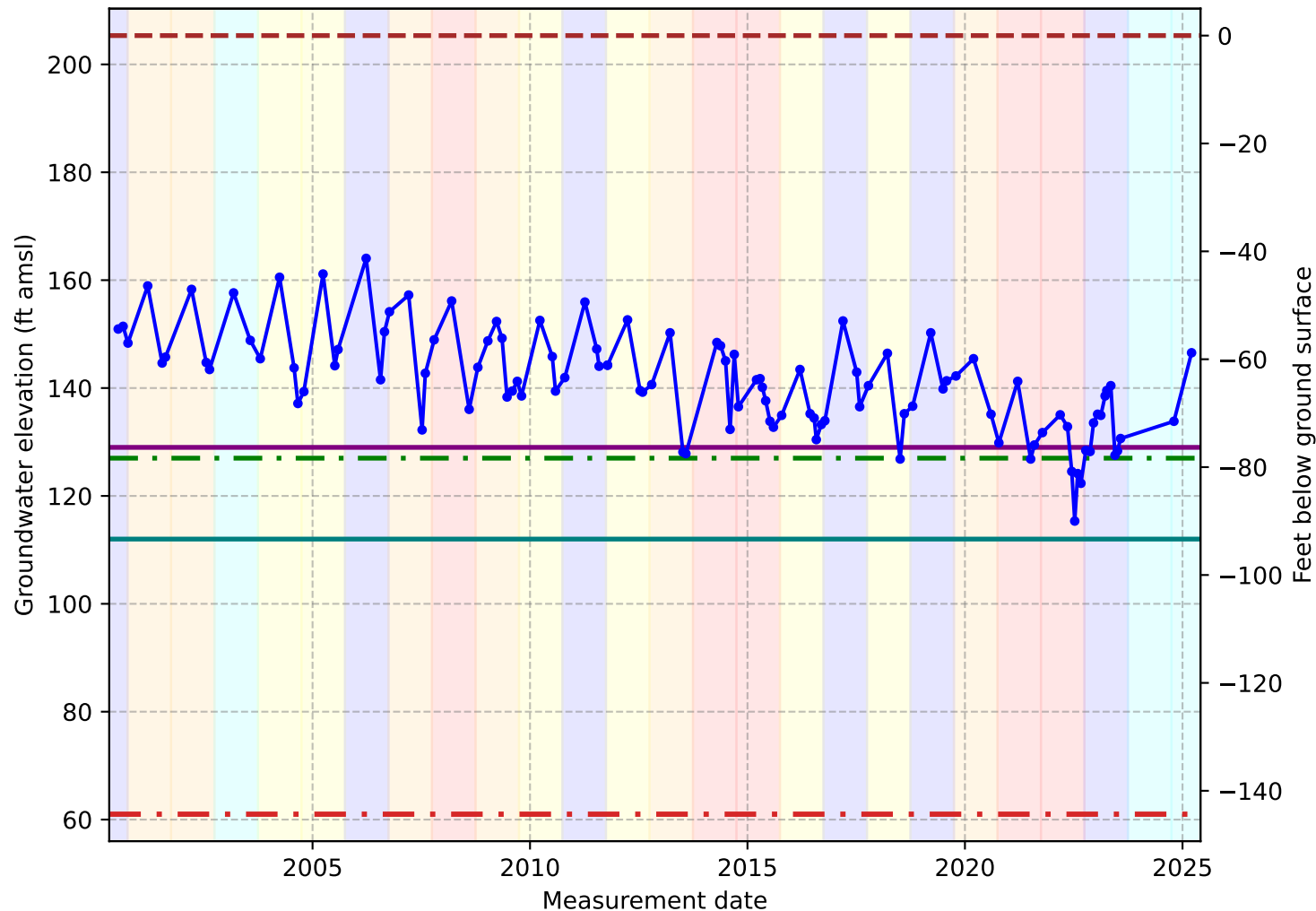
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 239

Alternative 1
2022 MT + LML

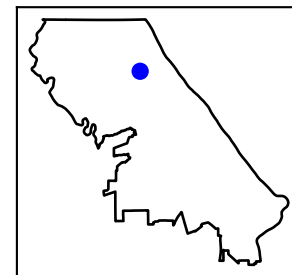
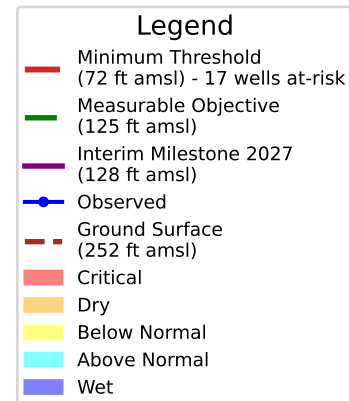
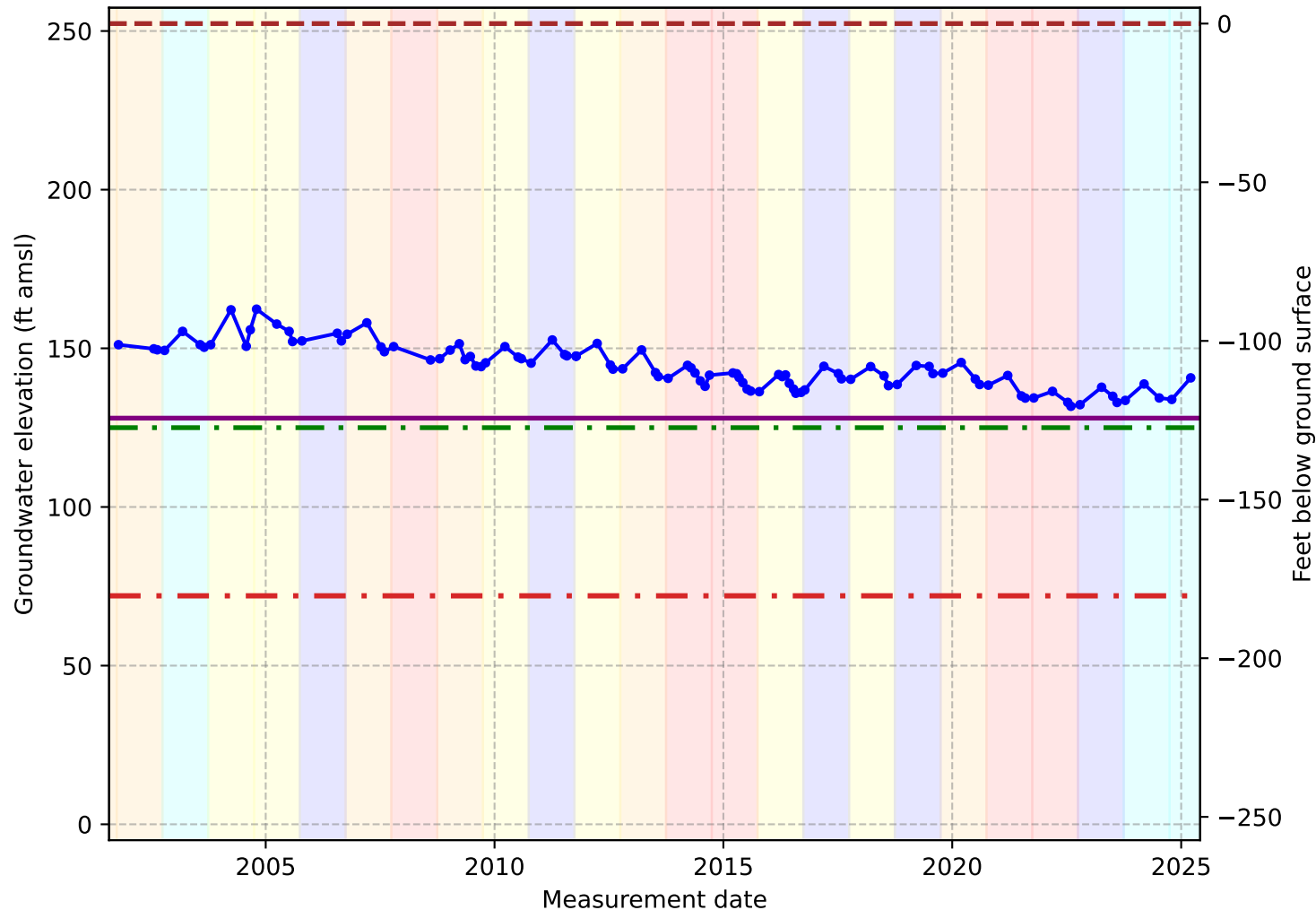


23

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

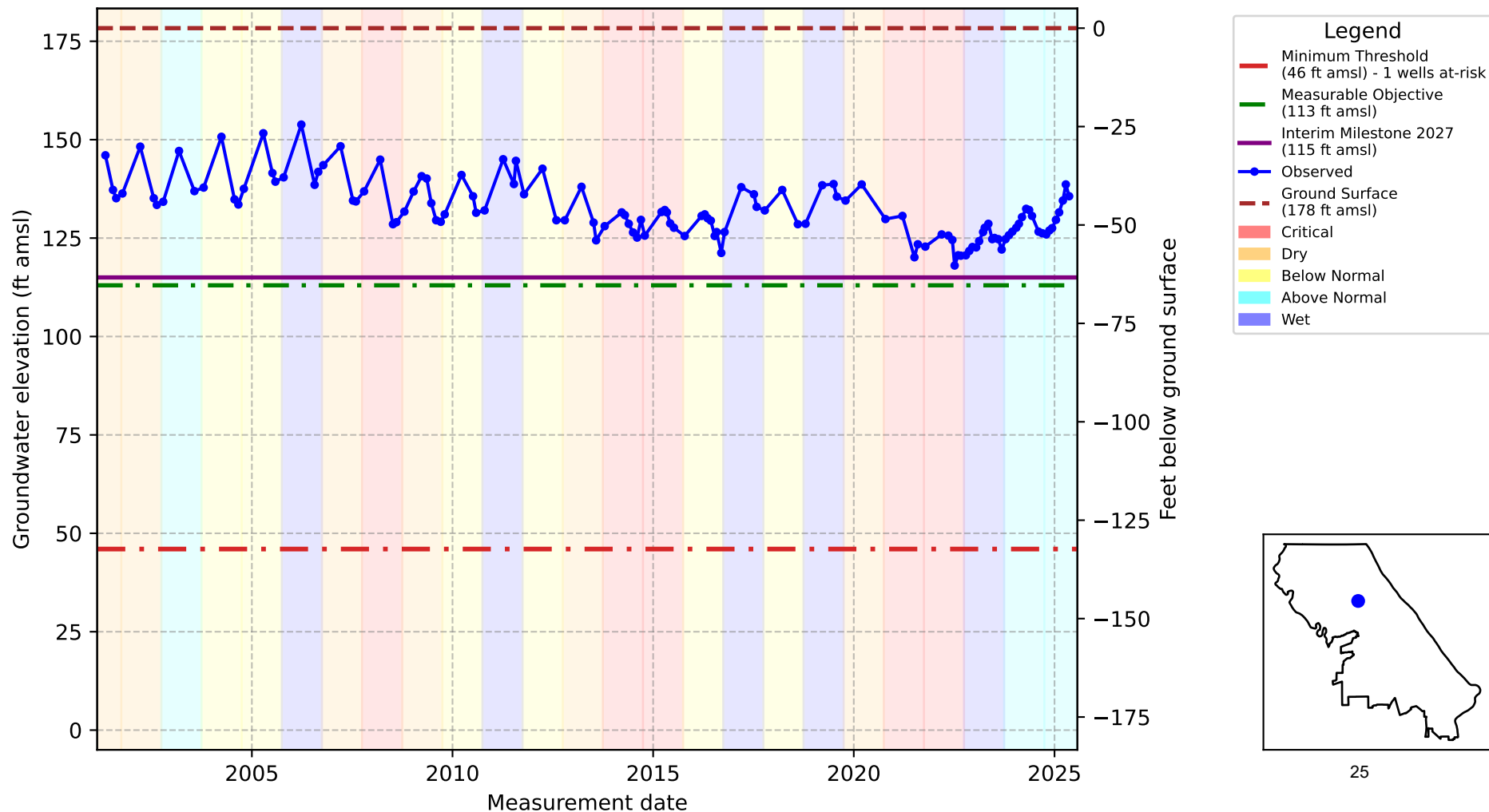
Total Number of Domestic Wells = 88

Alternative 1
2022 MT + LML



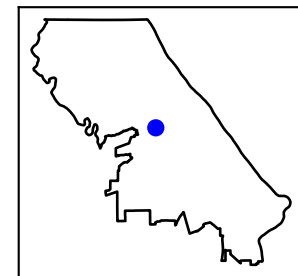
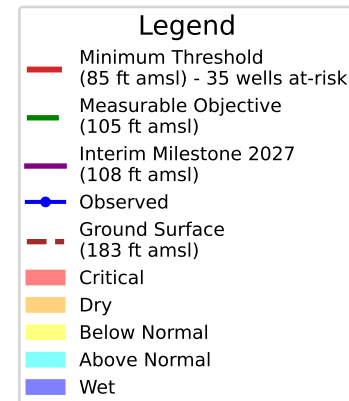
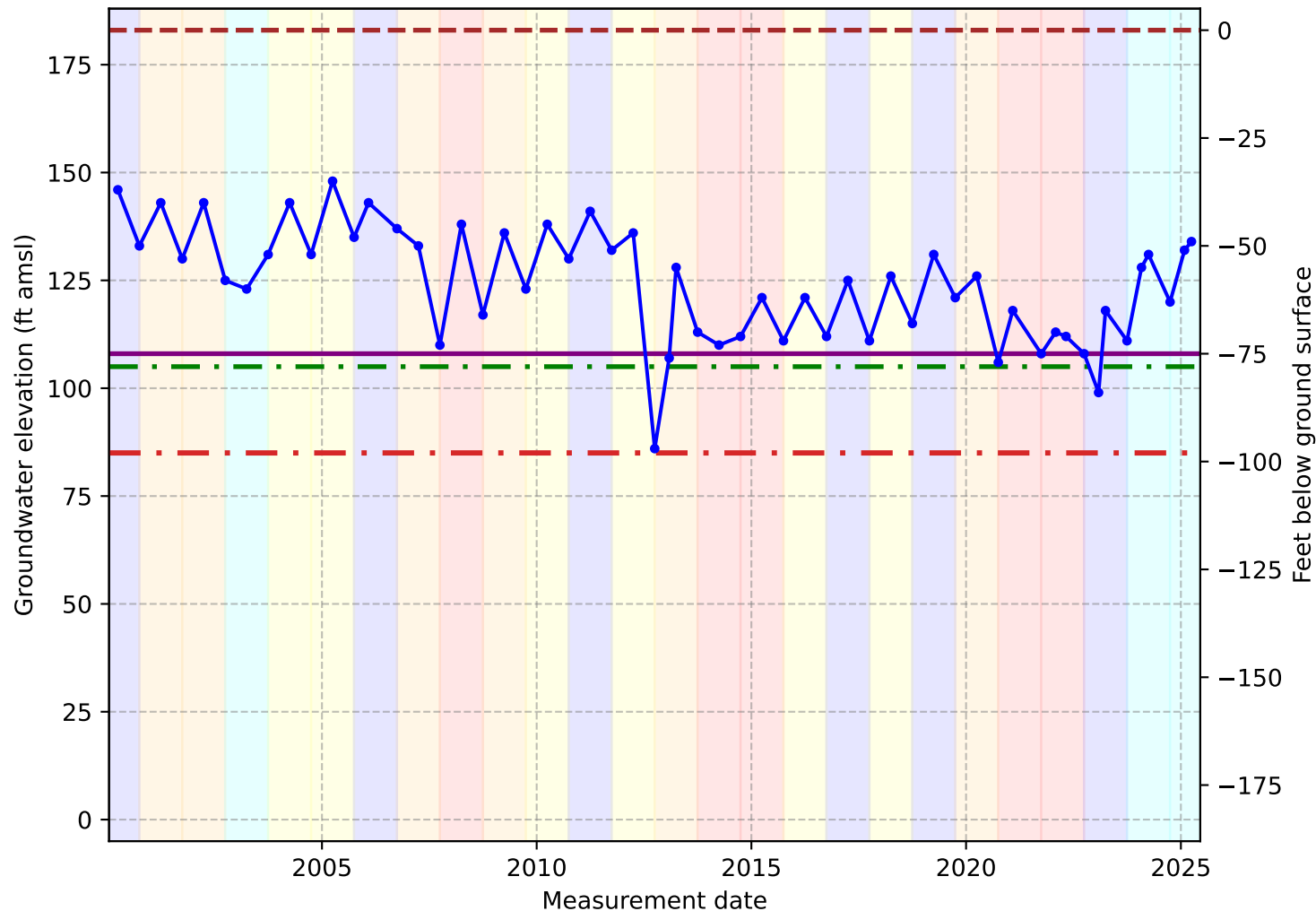
Vina Subbasin - State Well Number (SWN): 22N01E09B001M
Total Number of Domestic Wells = 12

Alternative 1
2022 MT + LML



Vina Subbasin - State Well Number (SWN): CWSCH02
Total Number of Domestic Wells = 387

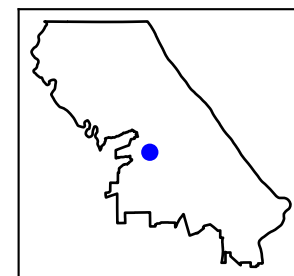
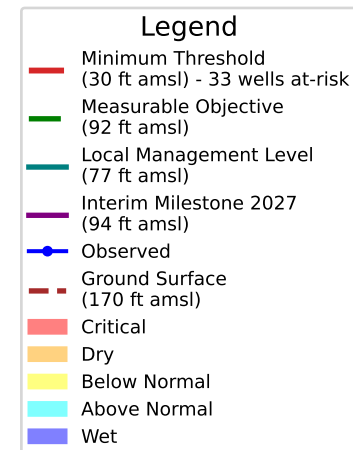
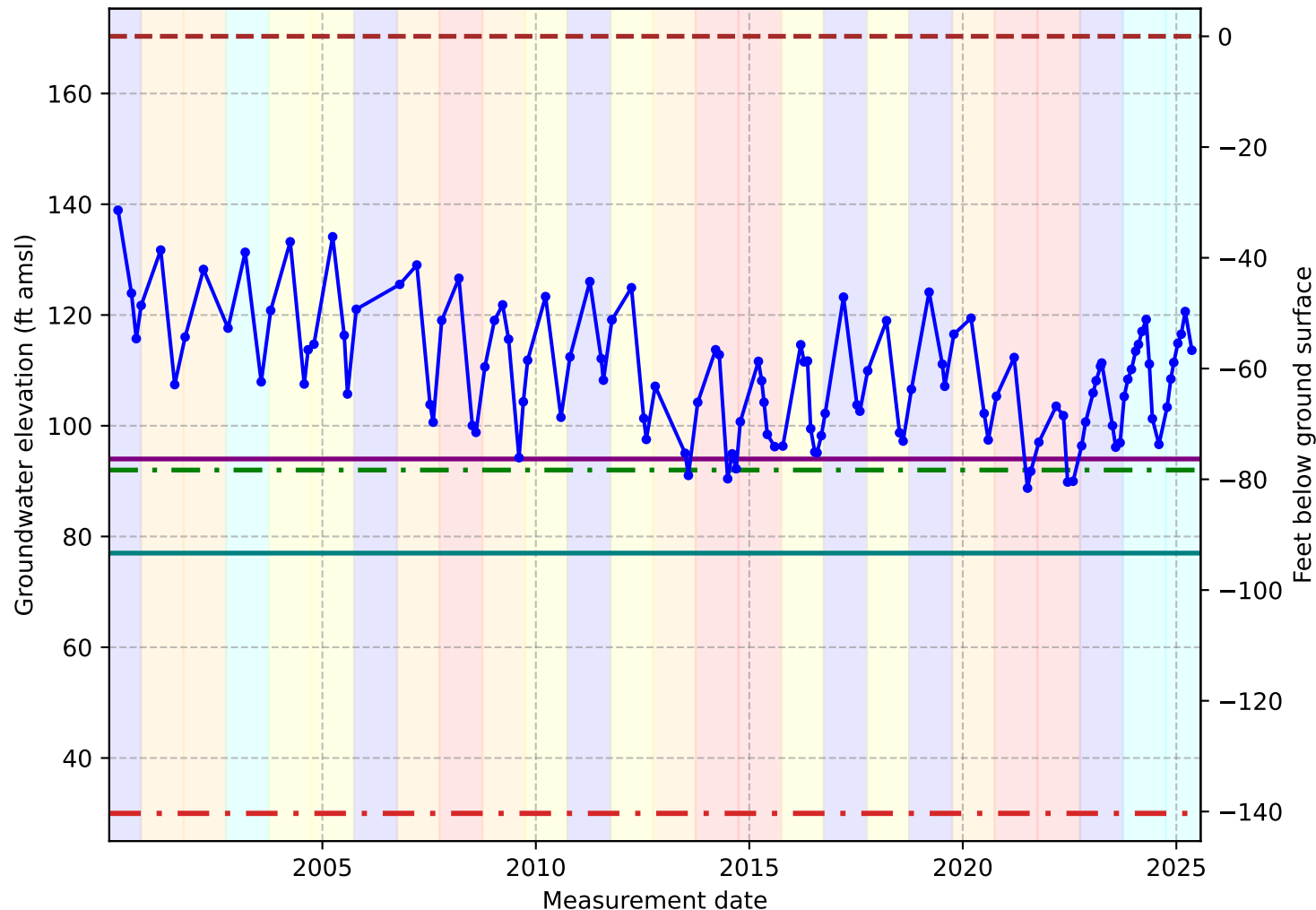
Alternative 1
2022 MT + LML



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

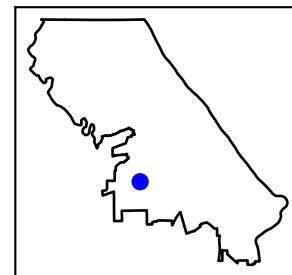
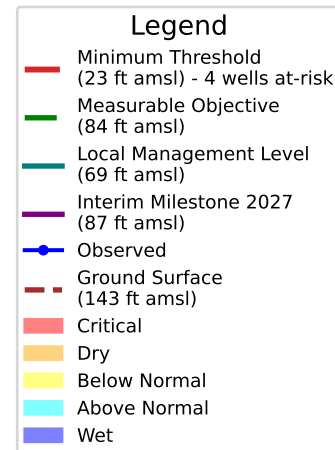
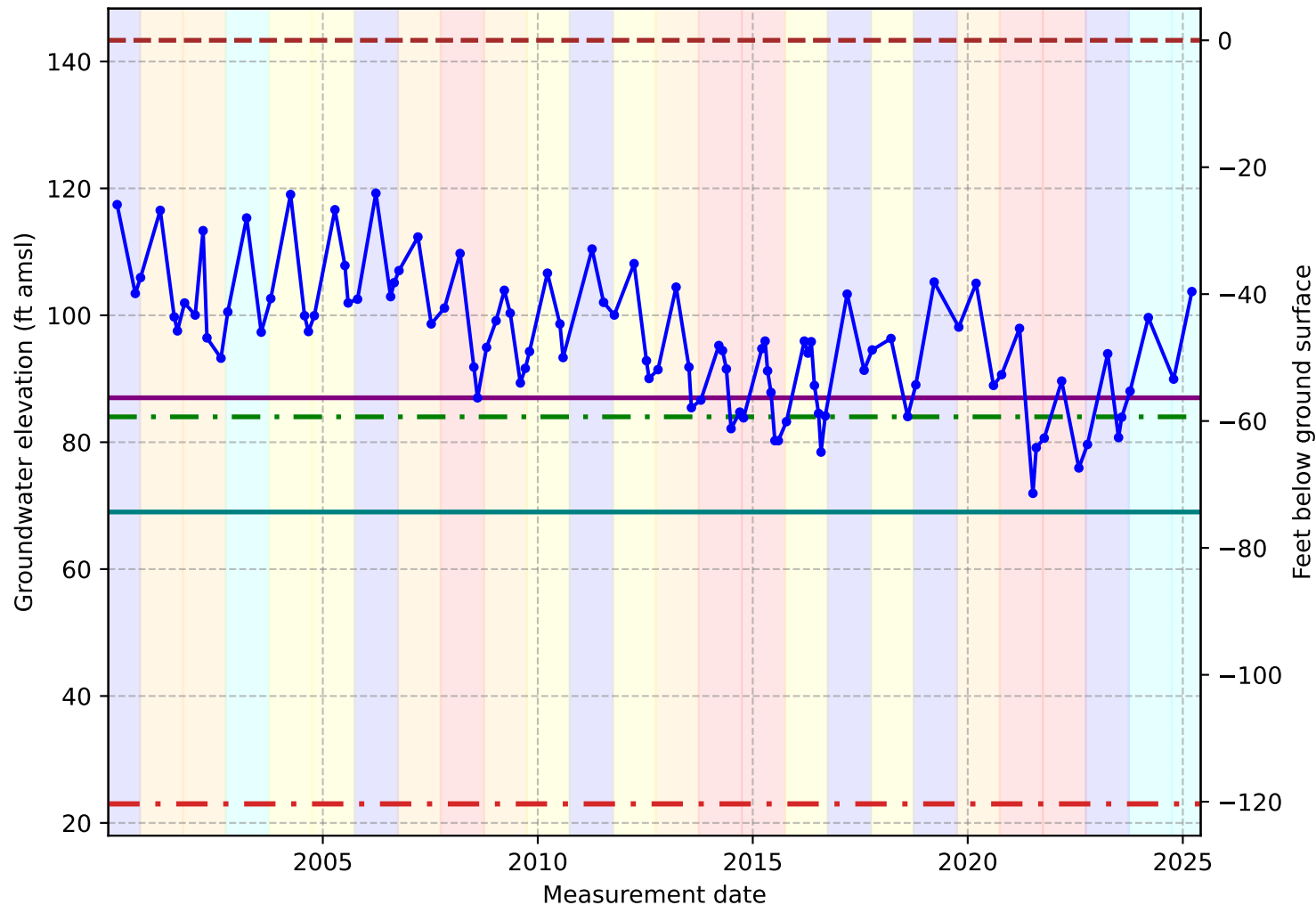
Total Number of Domestic Wells = 105

Alternative 1
2022 MT + LML



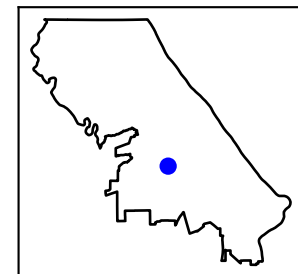
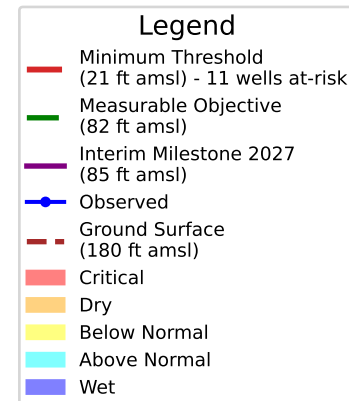
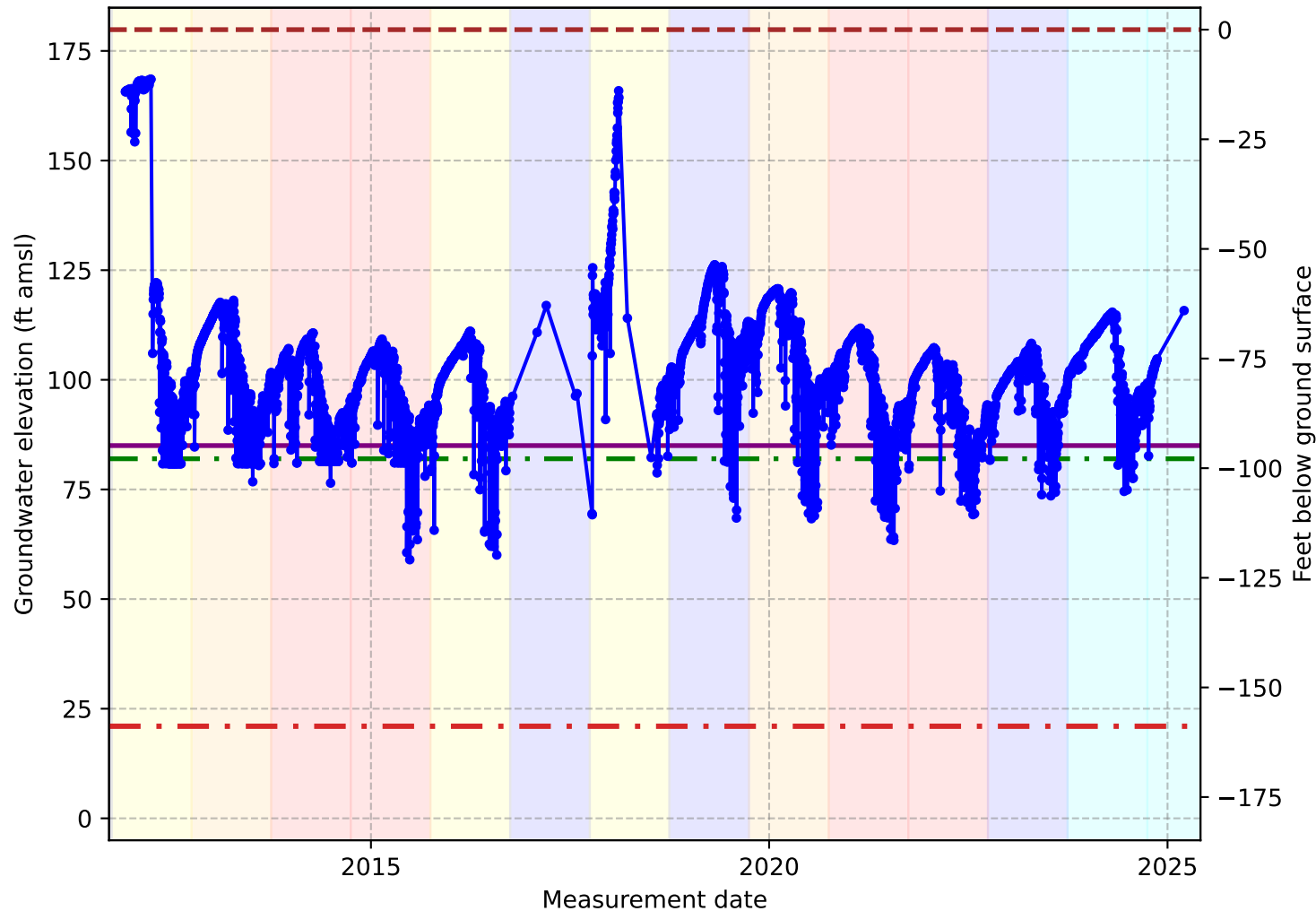
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Total Number of Domestic Wells = 61

Alternative 1
2022 MT + LML



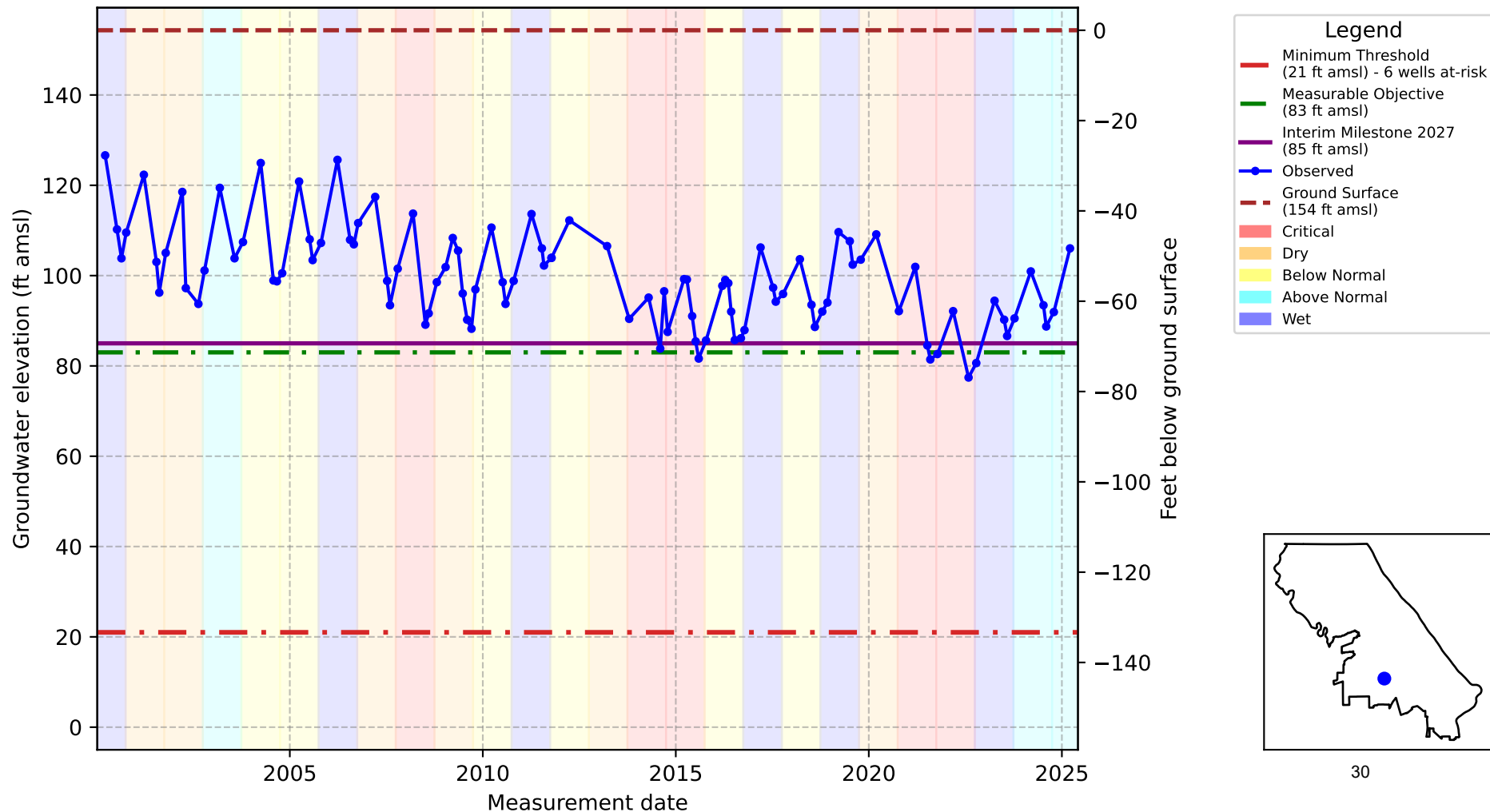
Vina Subbasin - State Well Number (SWN): 21N01E13L004M
Total Number of Domestic Wells = 28

Alternative 1
2022 MT + LML



Vina Subbasin - State Well Number (SWN): 21N01E25K001M
Total Number of Domestic Wells = 27

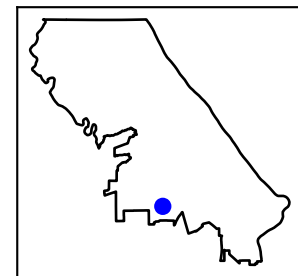
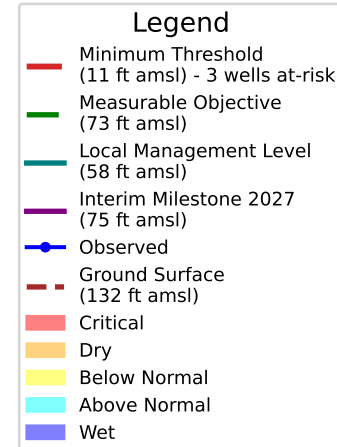
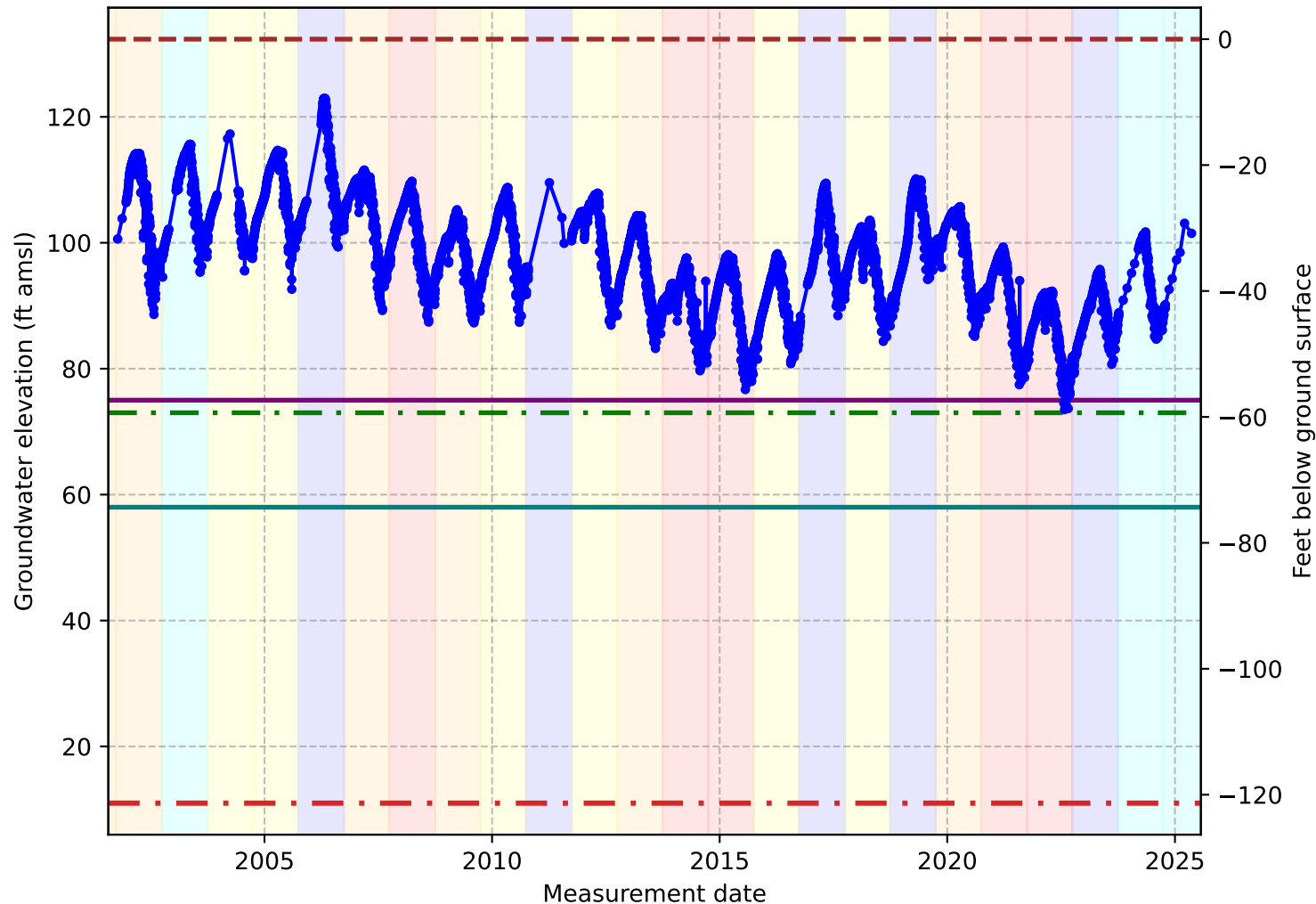
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 15

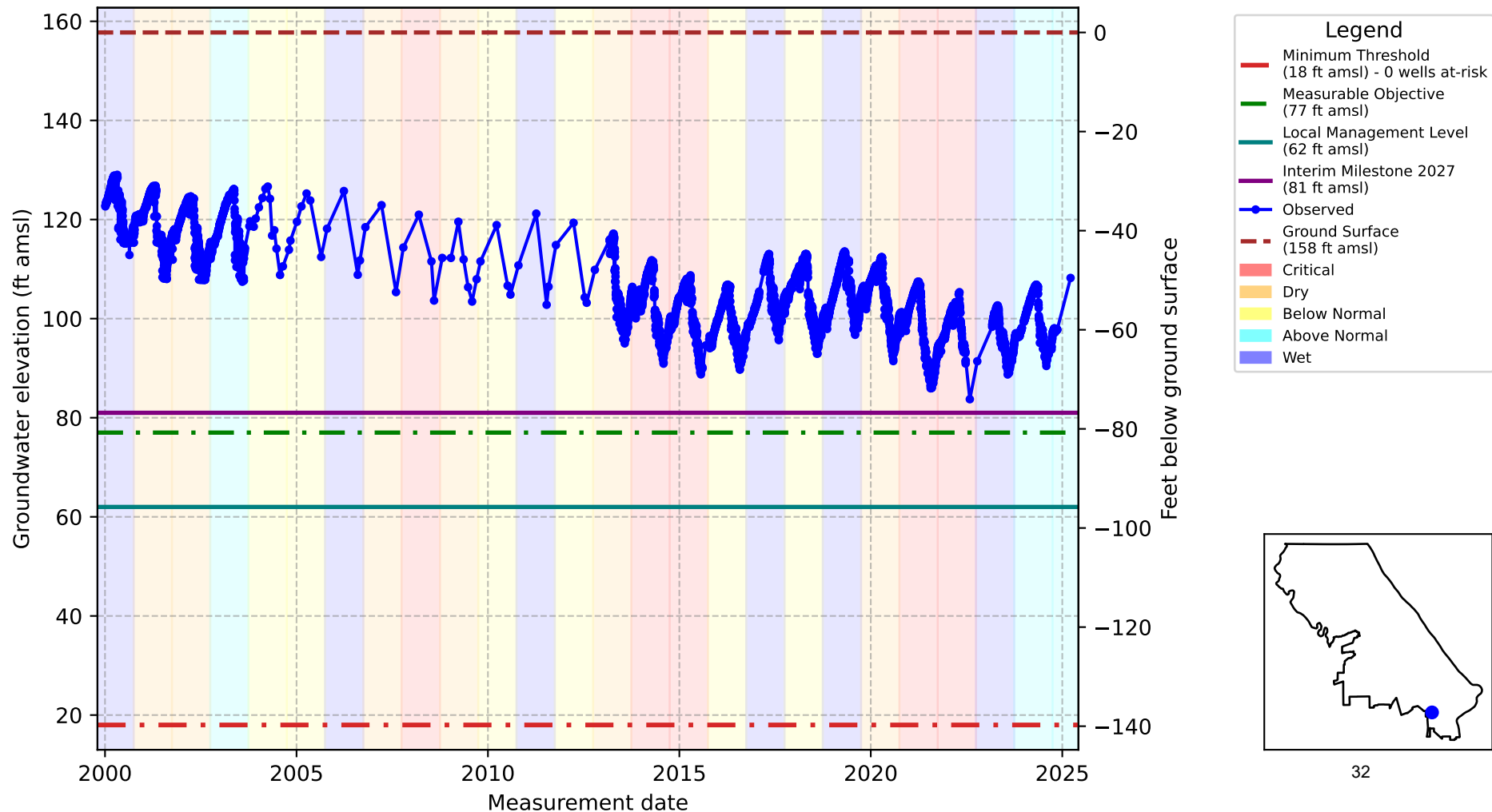
Alternative 1
2022 MT + LML



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

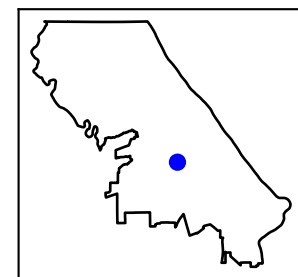
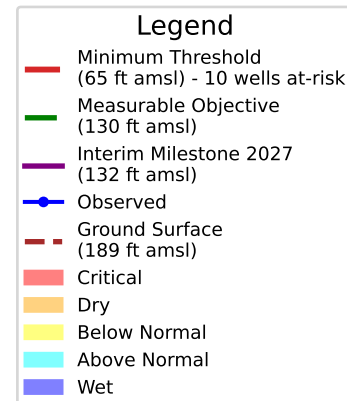
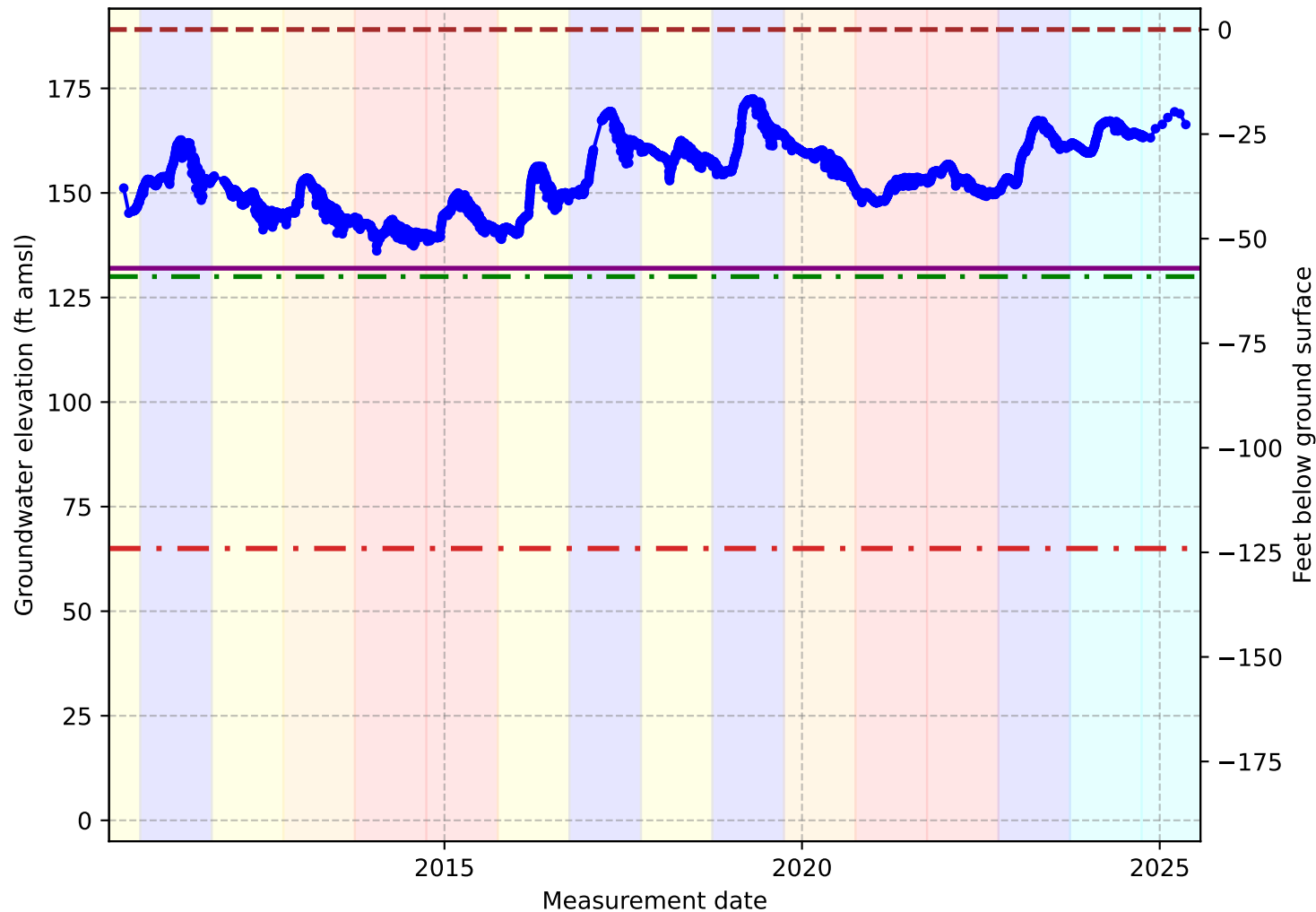
Total Number of Domestic Wells = 7

Alternative 1
2022 MT + LML



Vina Subbasin - State Well Number (SWN): 21N02E18C003M
Total Number of Domestic Wells = 92

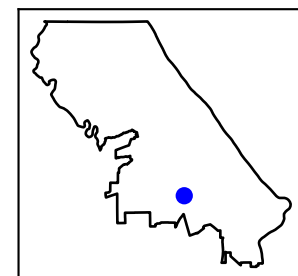
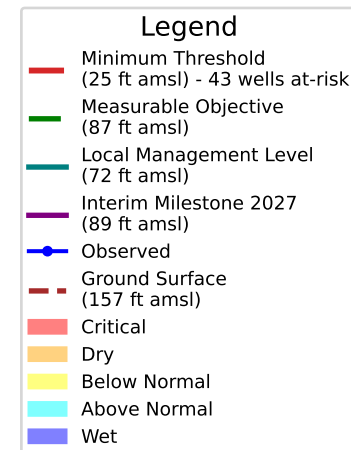
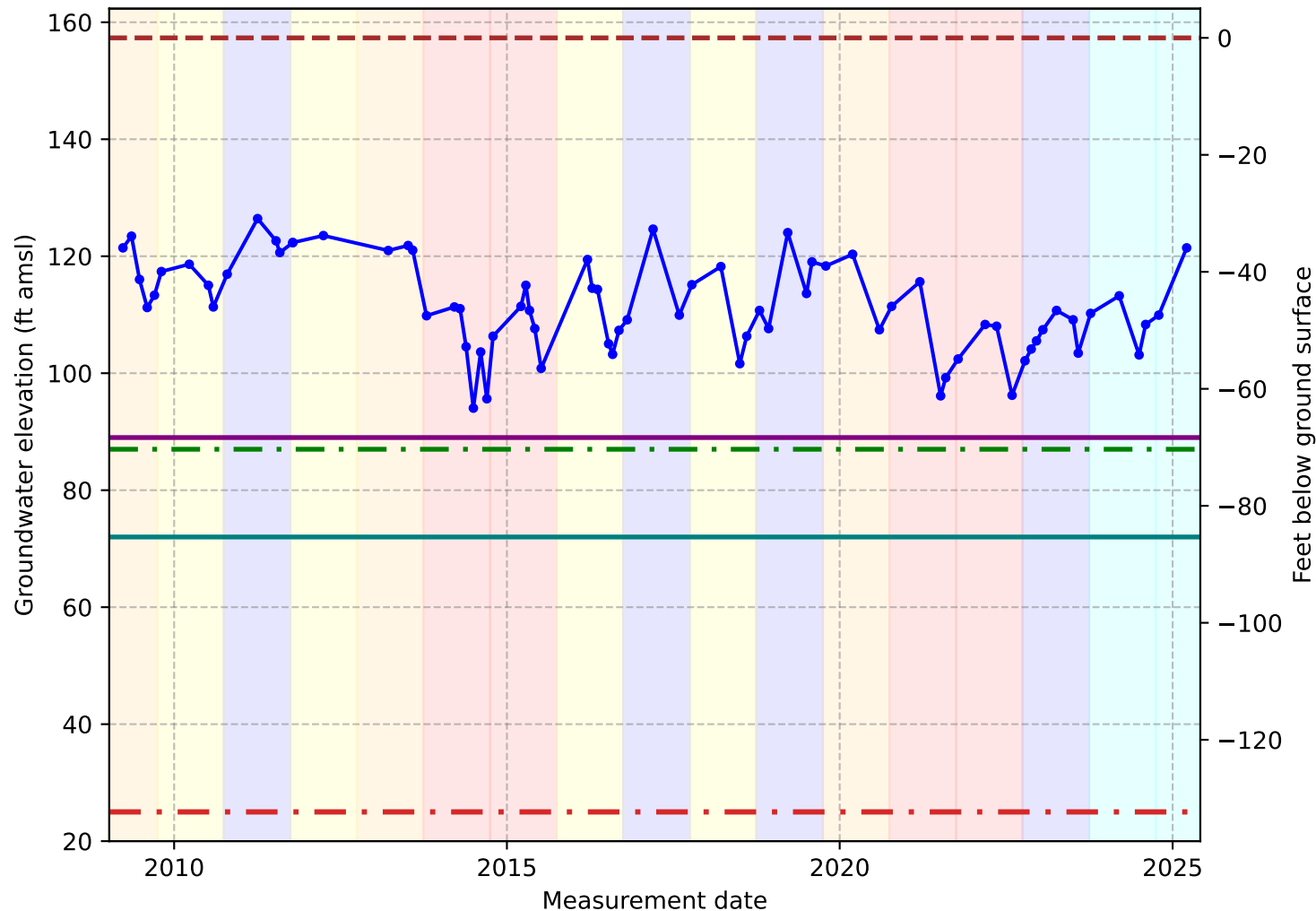
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 110

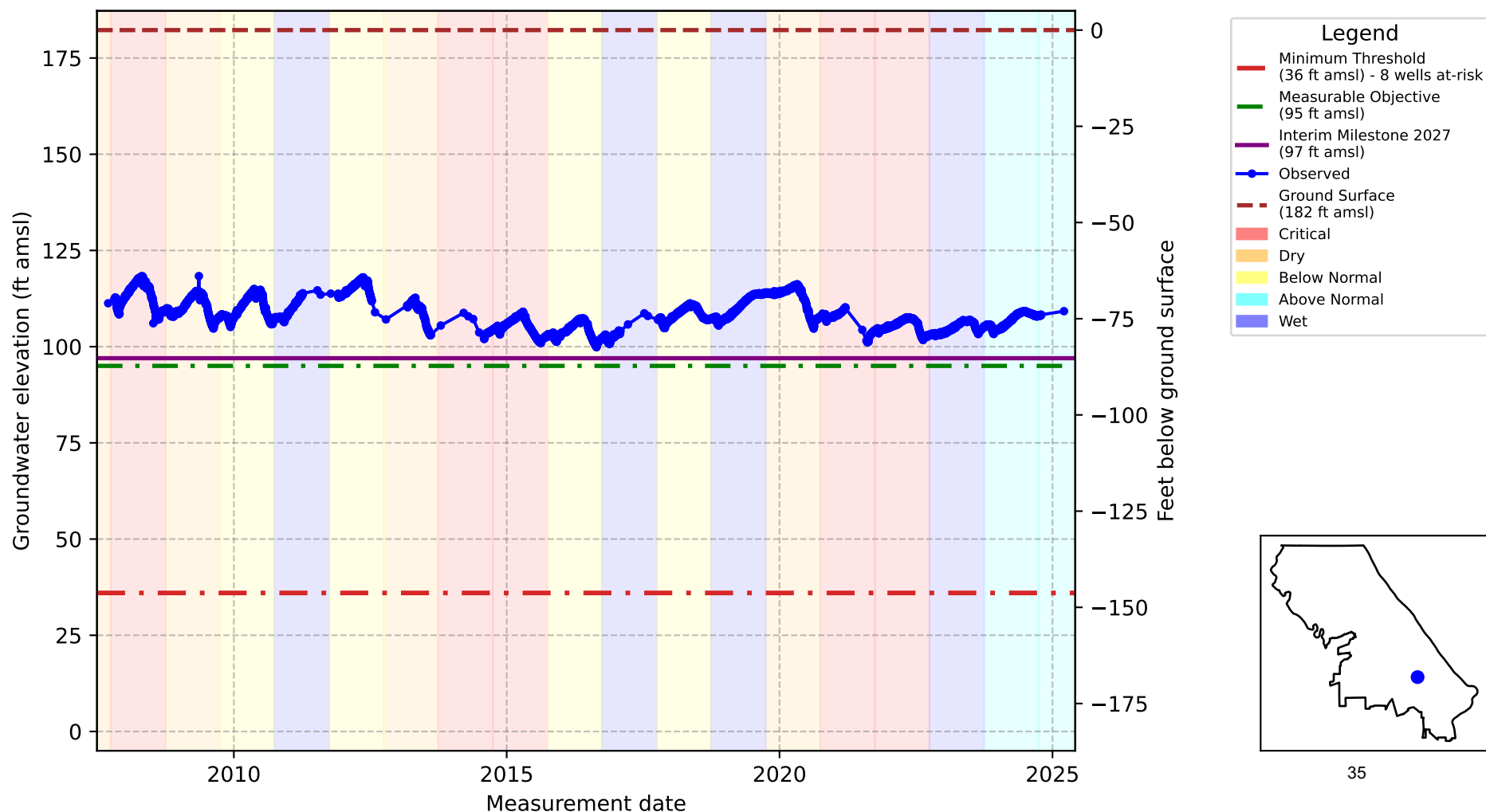
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 20

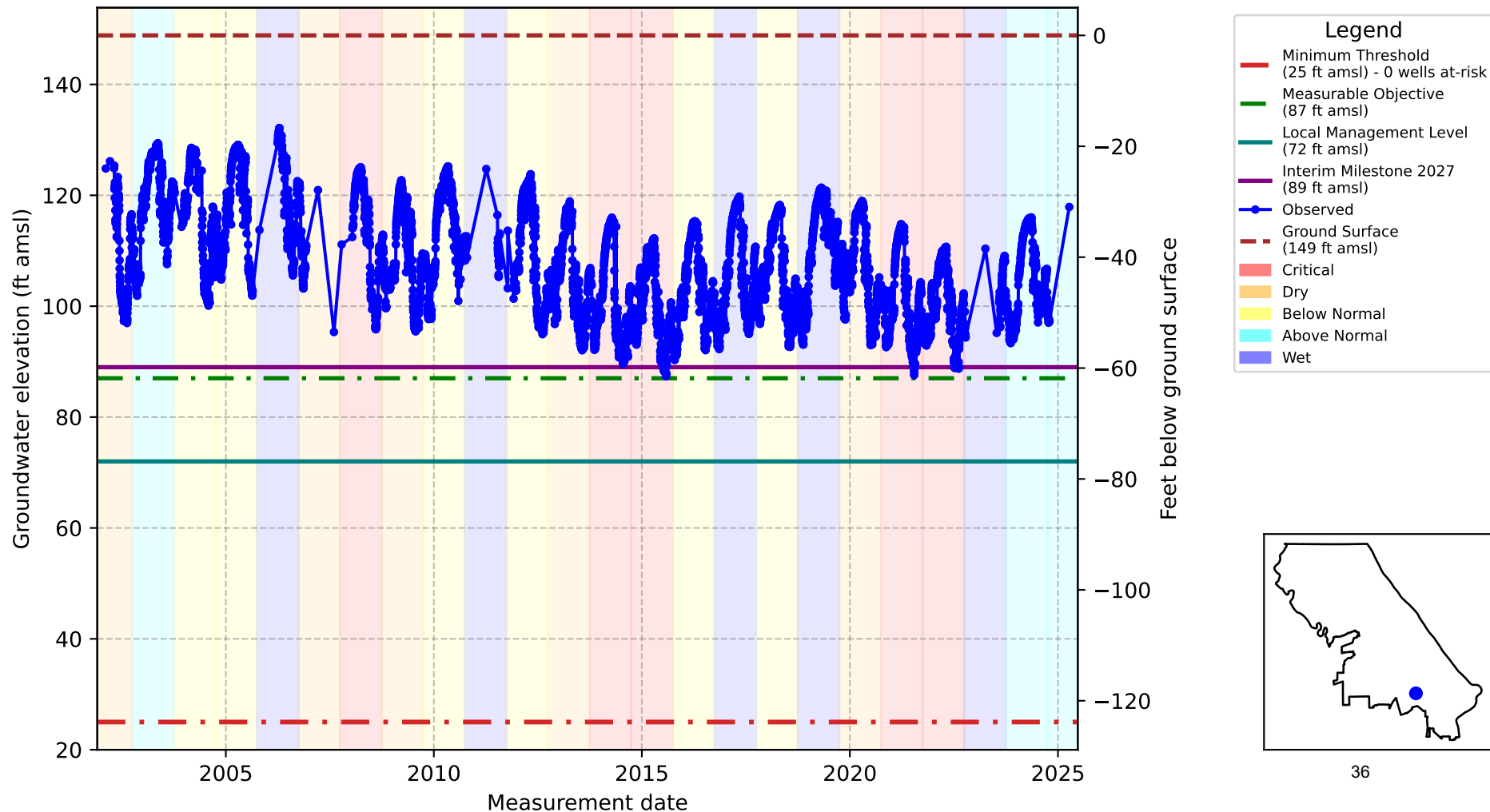
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 2

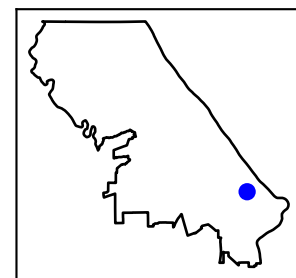
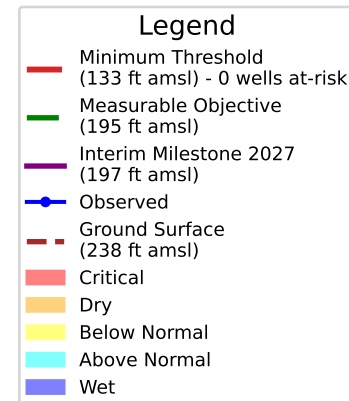
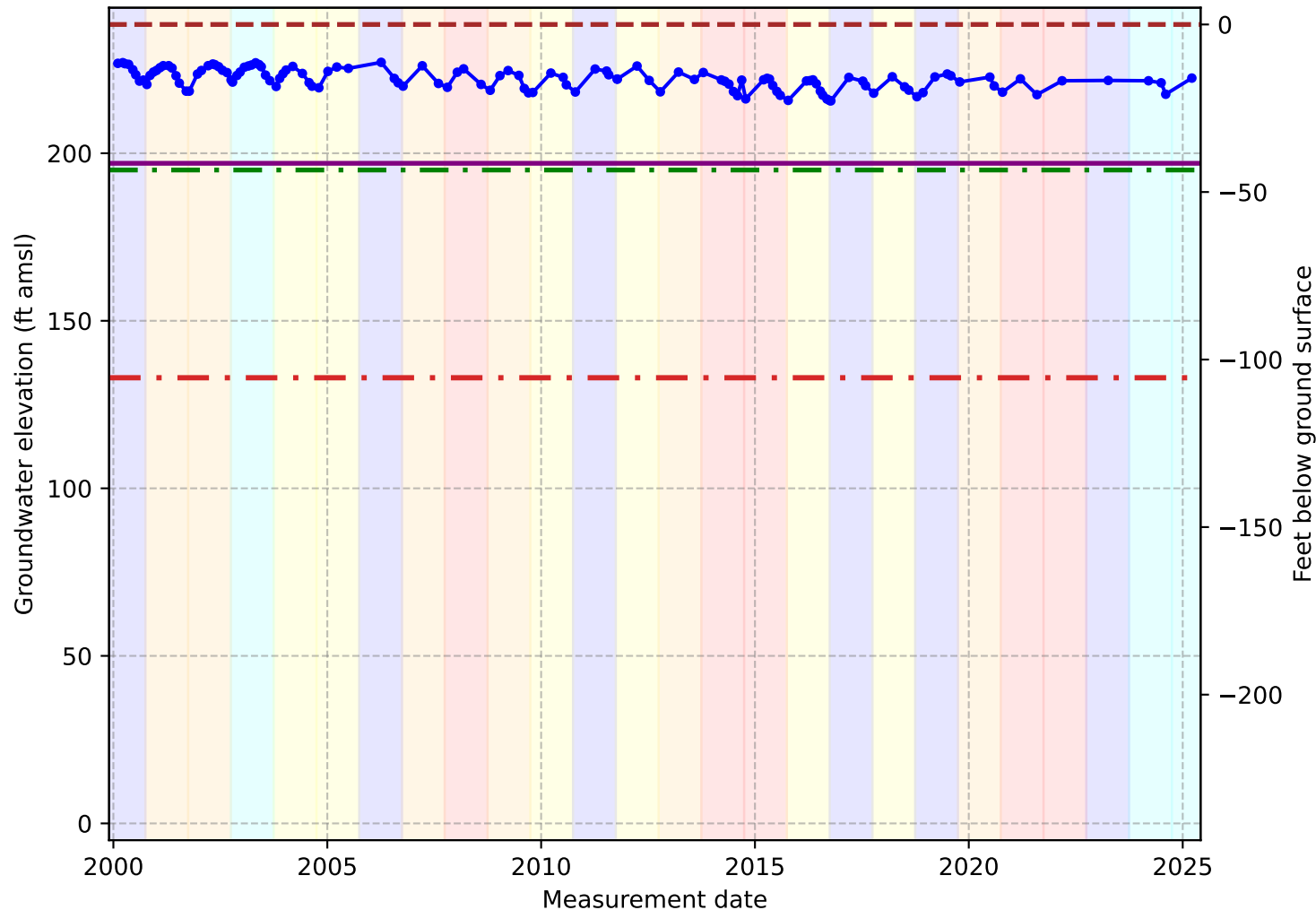
Alternative 1
2022 MT + LML



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

Total Number of Domestic Wells = 7

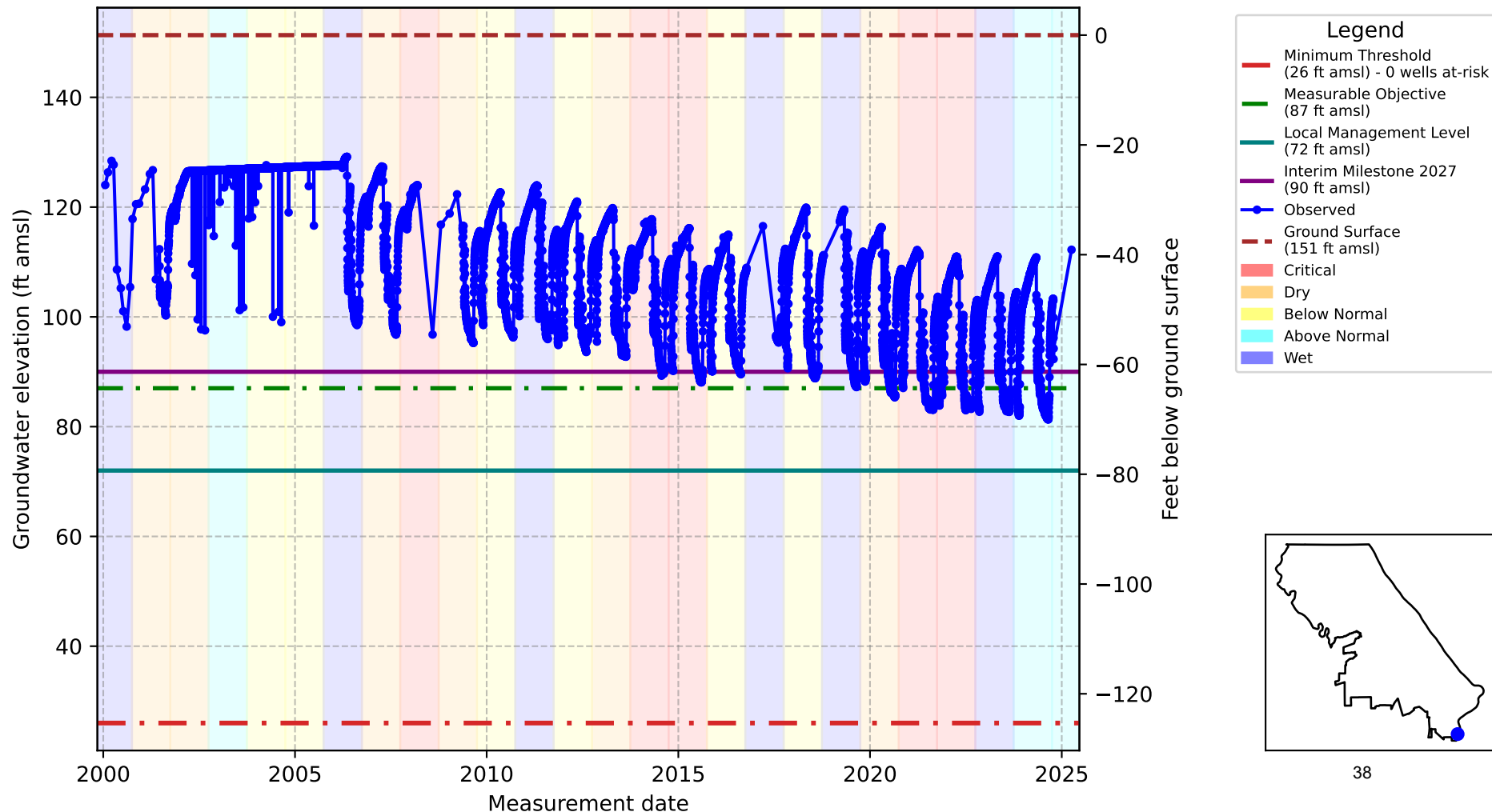
Alternative 1
2022 MT + LML



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

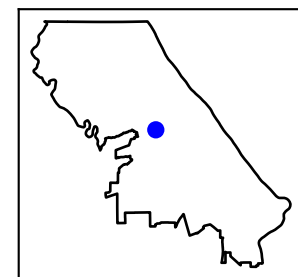
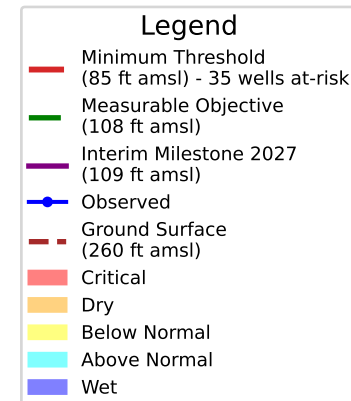
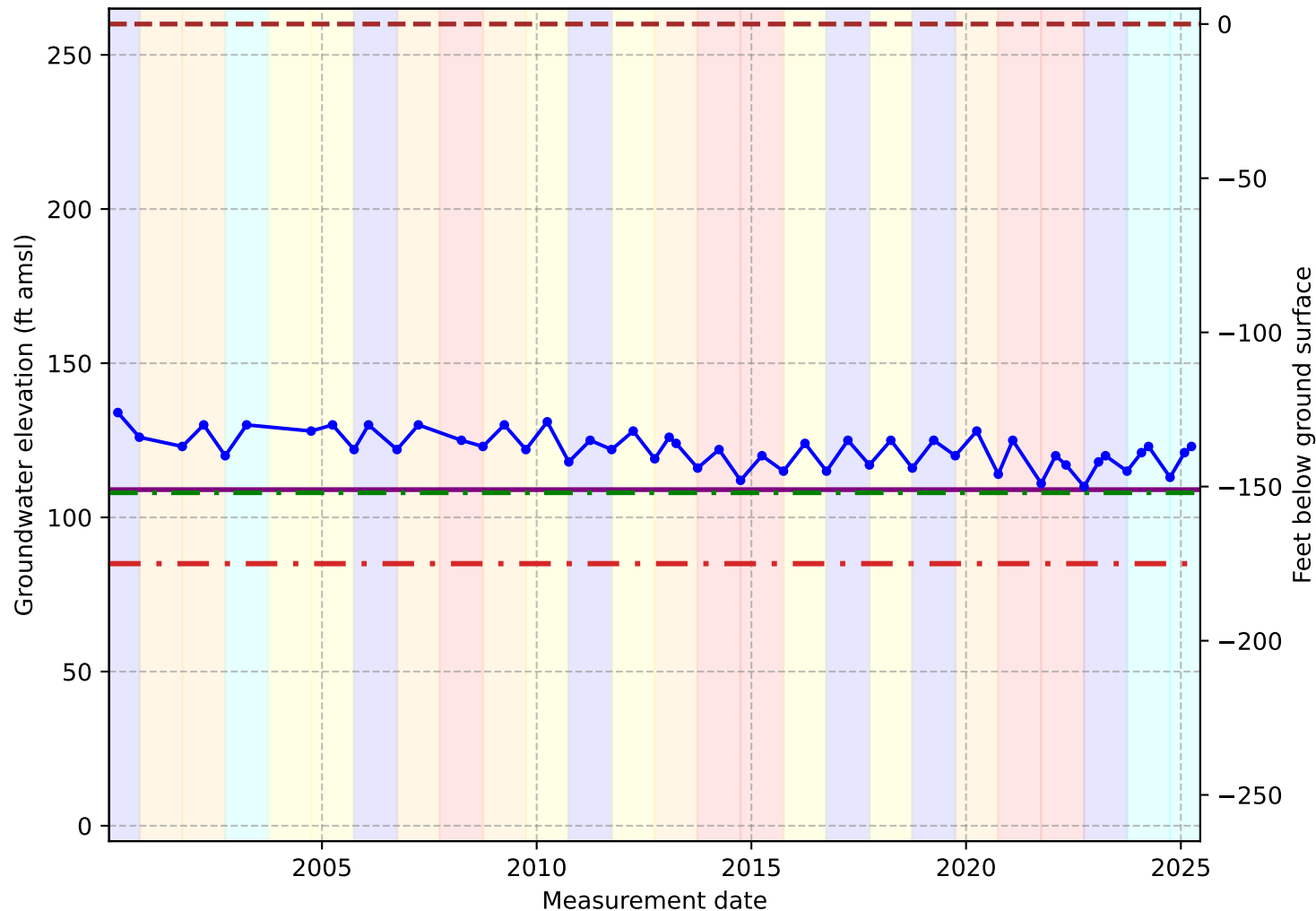
Total Number of Domestic Wells = 2

Alternative 1
2022 MT + LML



Vina Subbasin - State Well Number (SWN): CWSCH03
Total Number of Domestic Wells = 387

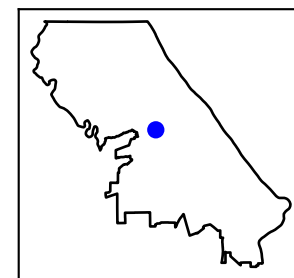
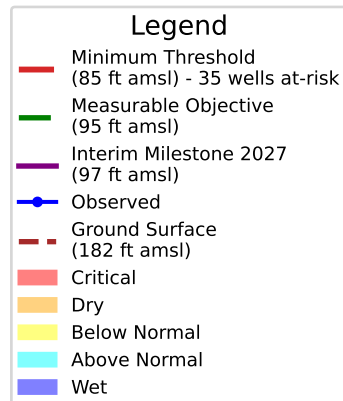
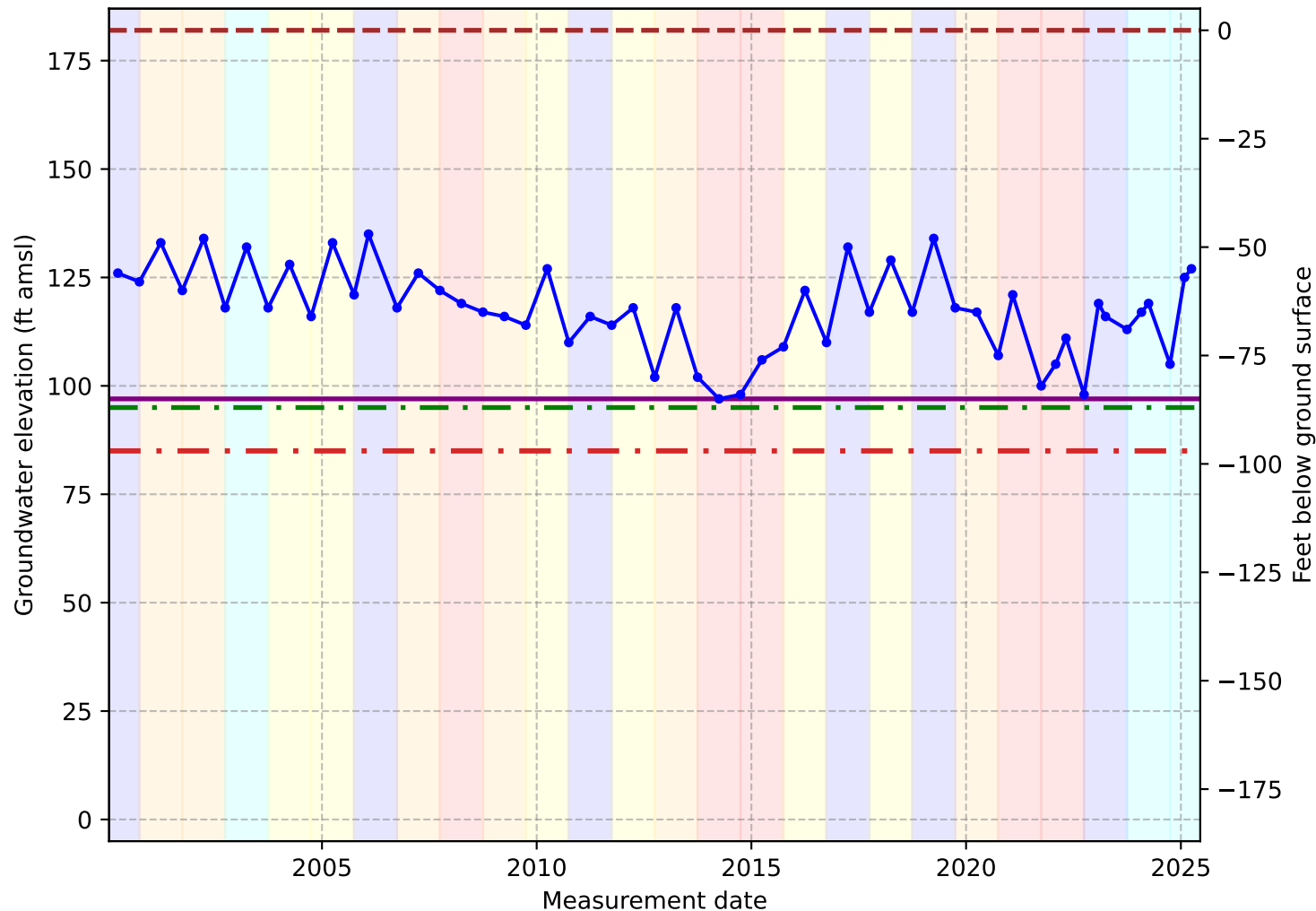
Alternative 1
2022 MT + LML



Vina Subbasin - State Well Number (SWN): CWSCH07

Total Number of Domestic Wells = 387

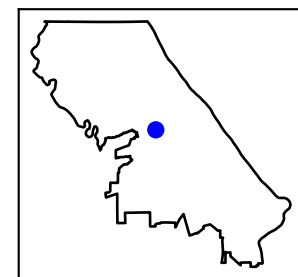
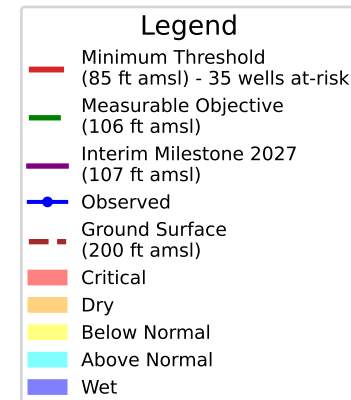
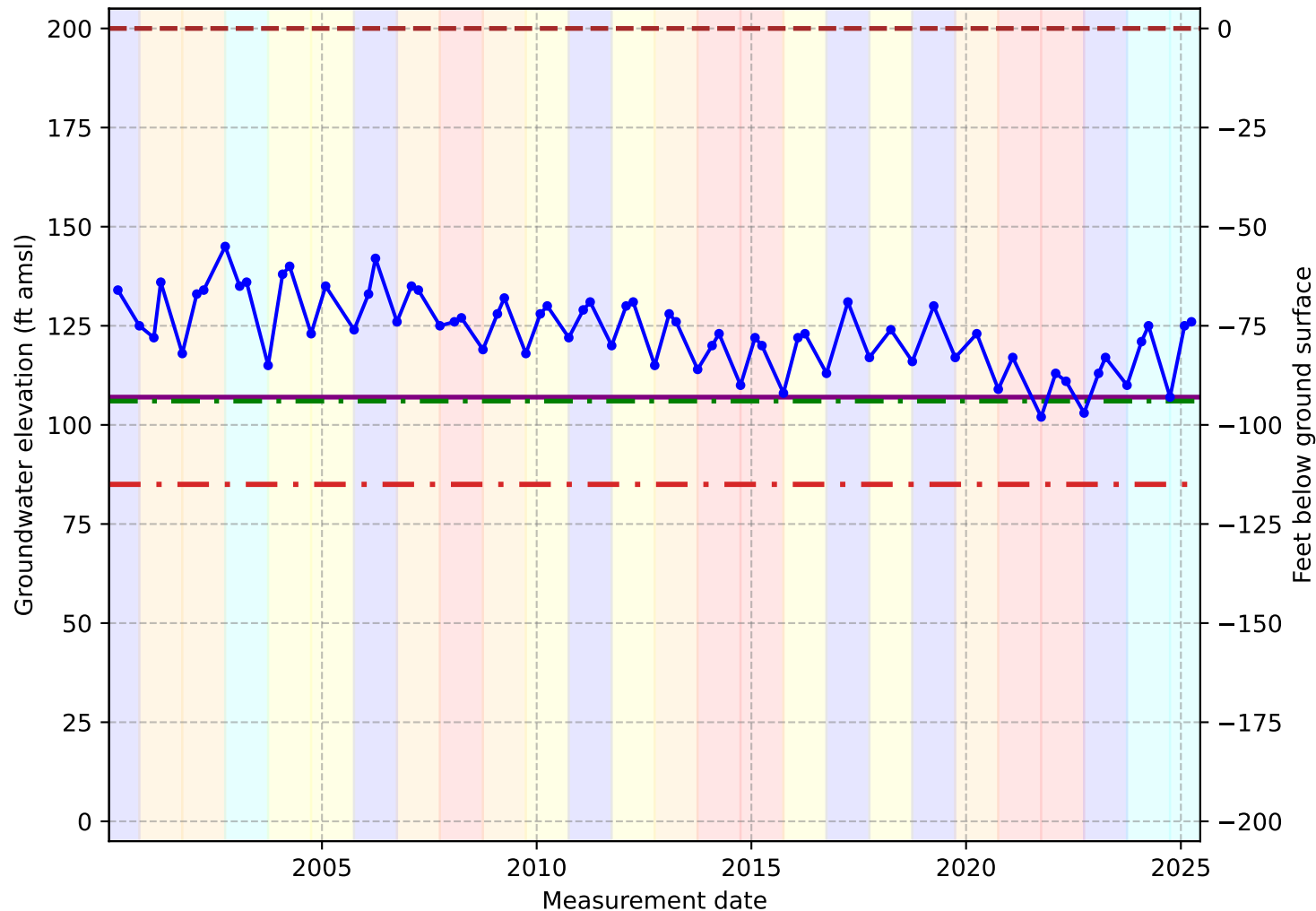
Alternative 1
2022 MT + LML



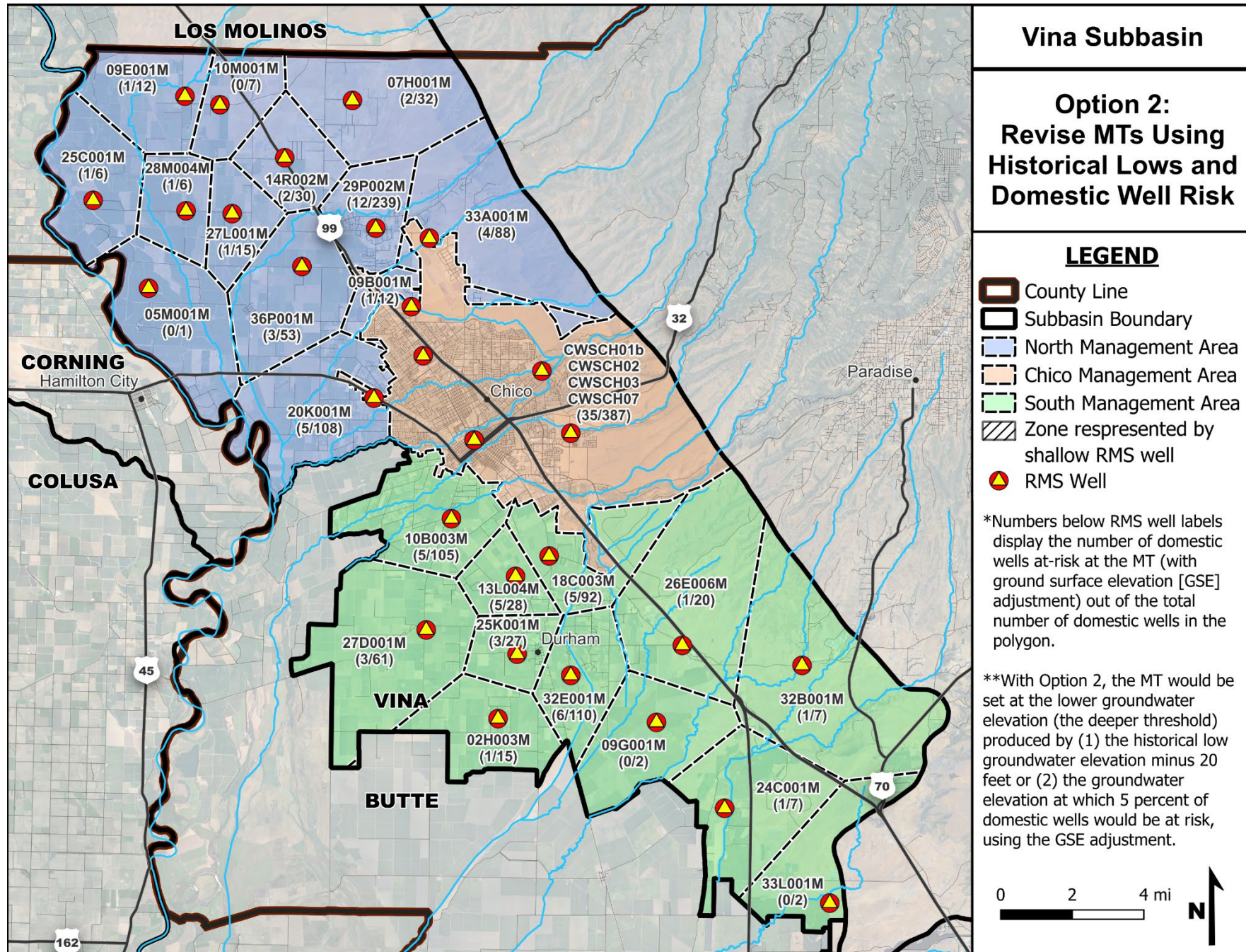
Vina Subbasin - State Well Number (SWN): CWSCH01b

Total Number of Domestic Wells = 387

Alternative 1
2022 MT + LML



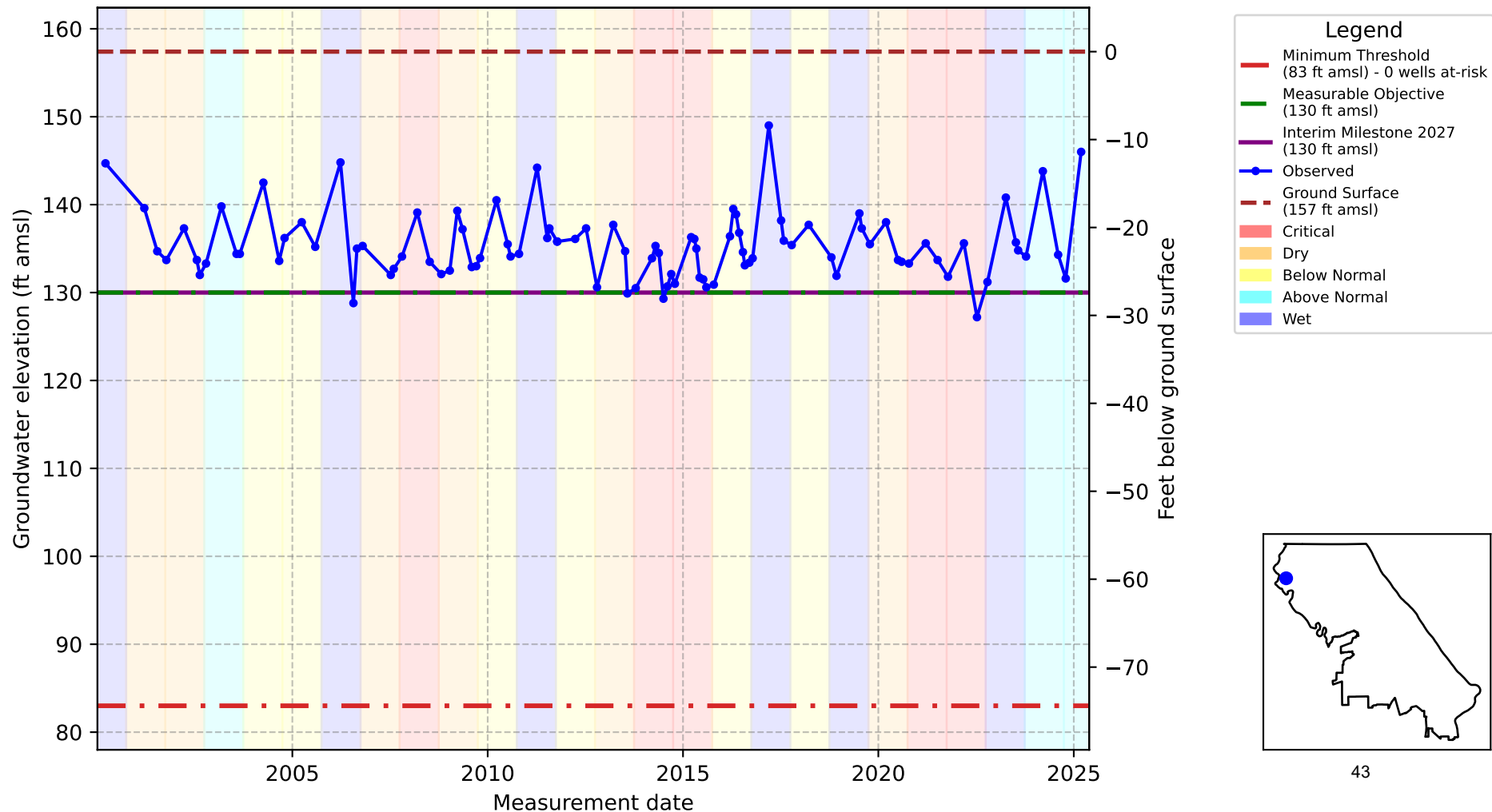
Alternative 2: Revised MTs



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

Alternative 2: Revised MT

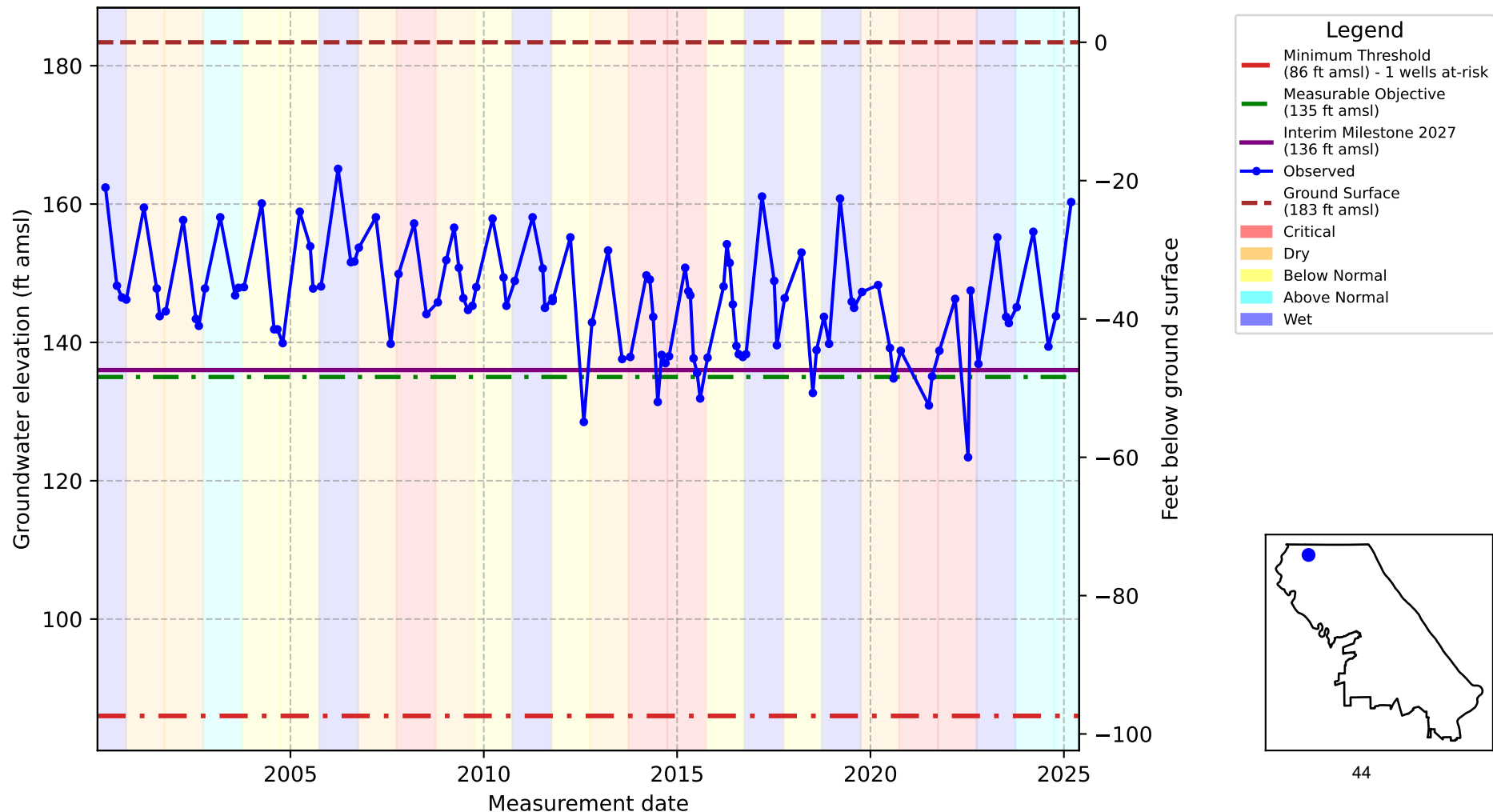
Total Number of Domestic Wells = 6



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

Total Number of Domestic Wells = 12

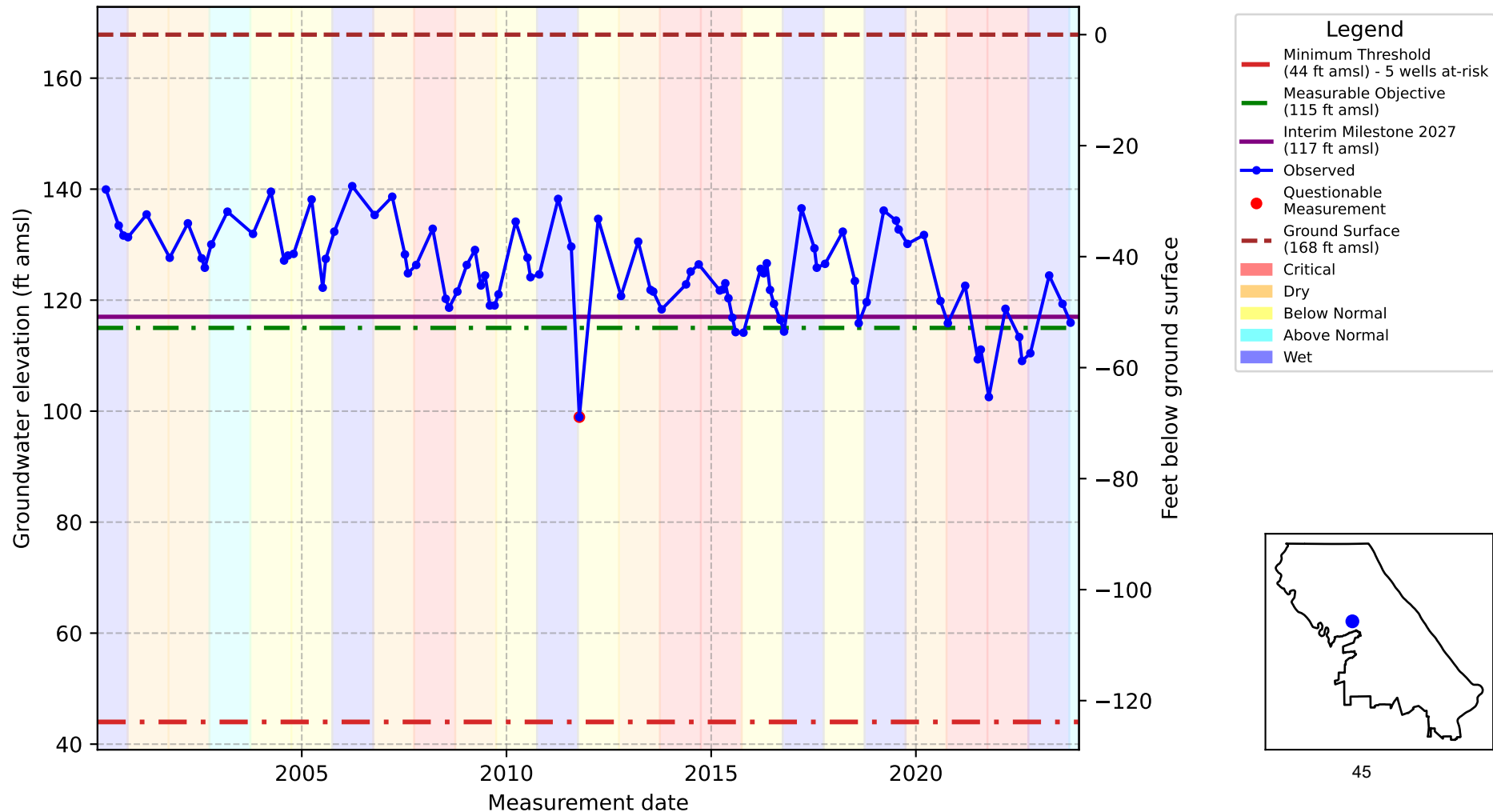
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 108

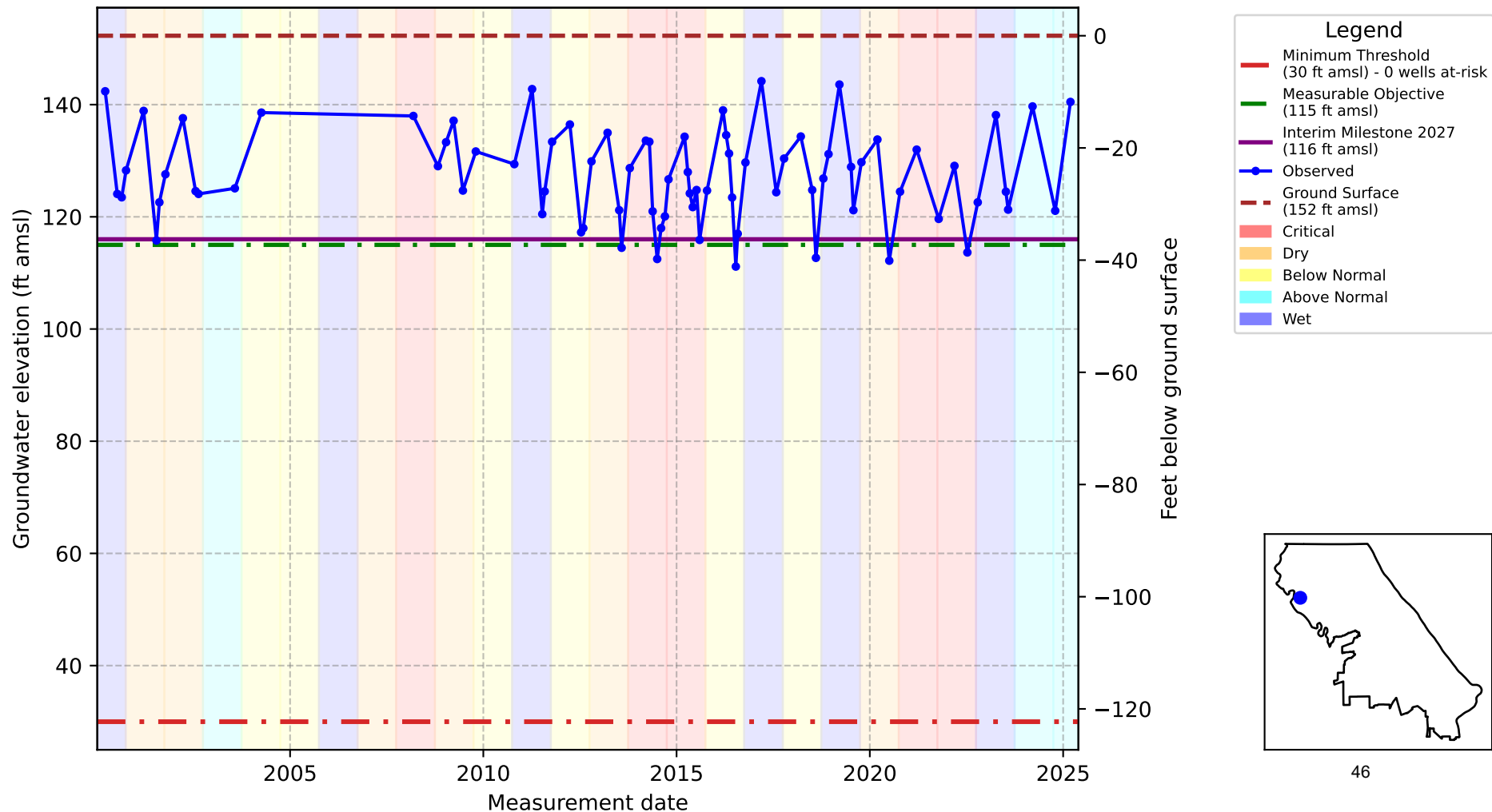
Alternative 2: Revised MT



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

Alternative 2: Revised MT

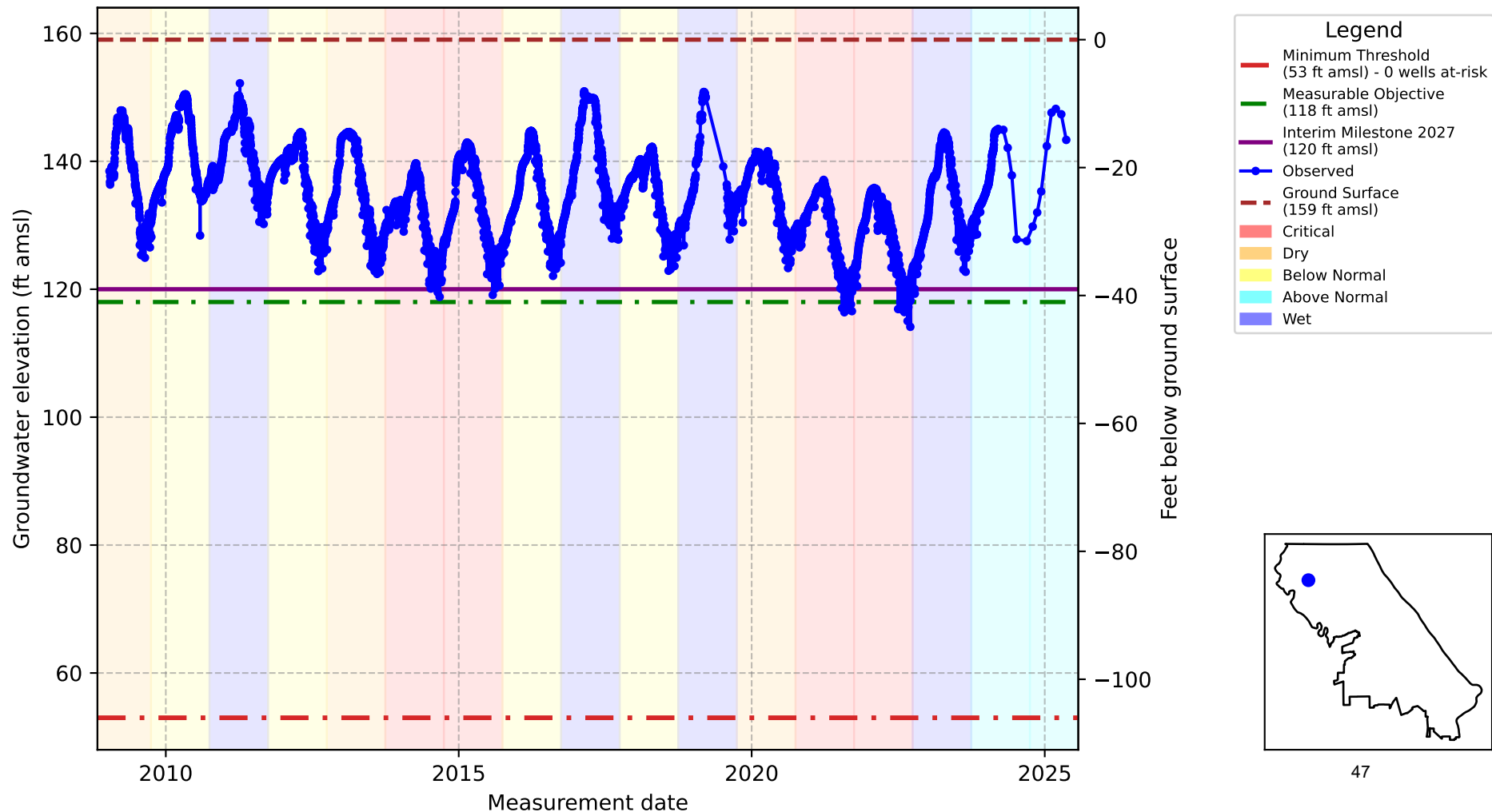
Total Number of Domestic Wells = 1



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

Alternative 2: Revised MT

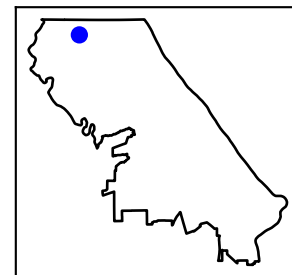
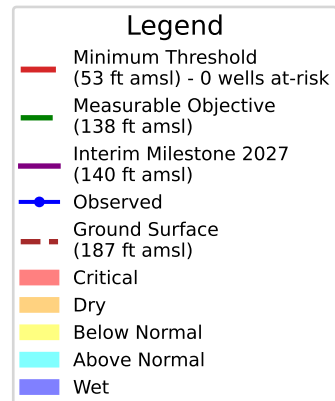
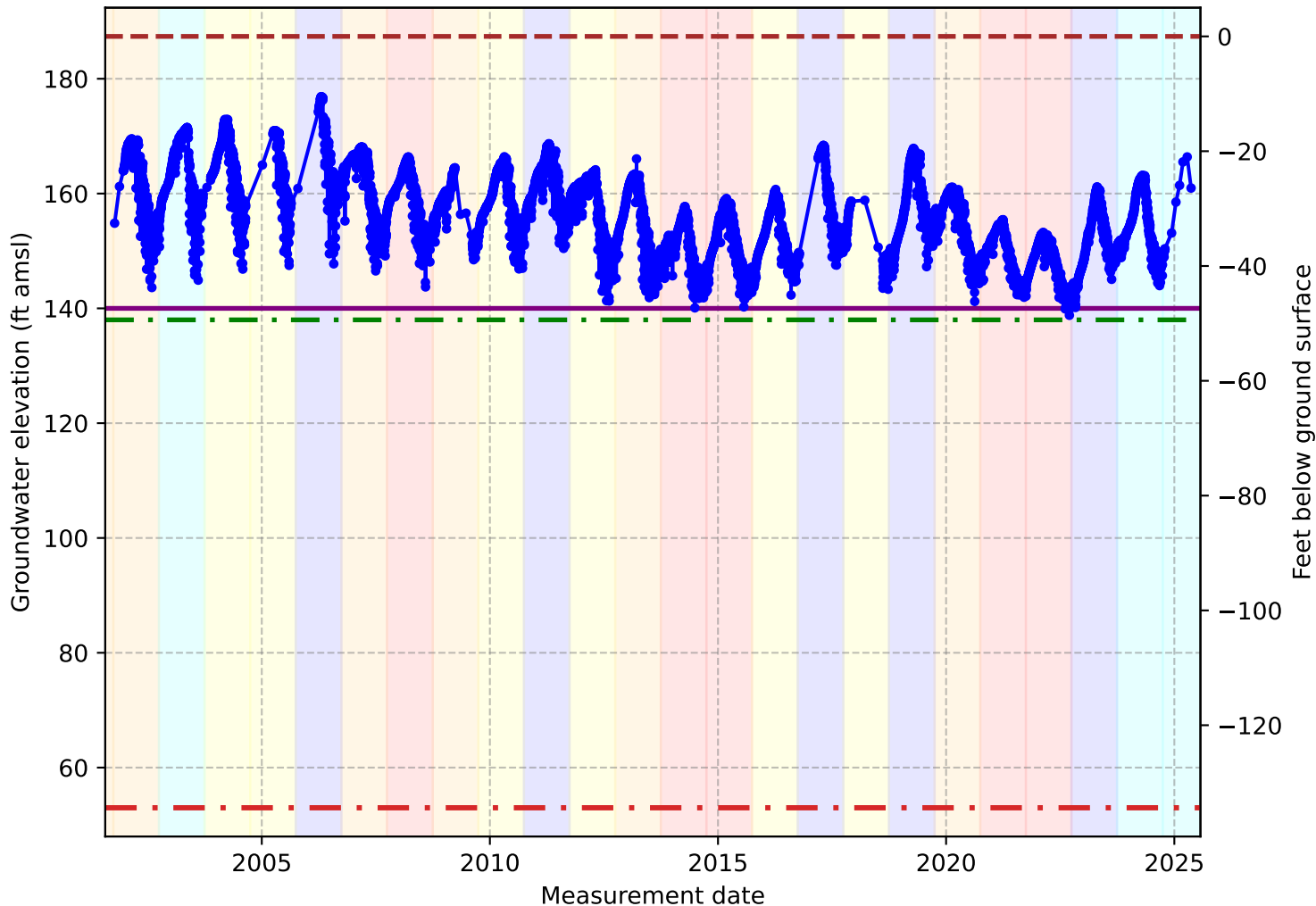
Total Number of Domestic Wells = 6



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

Total Number of Domestic Wells = 7

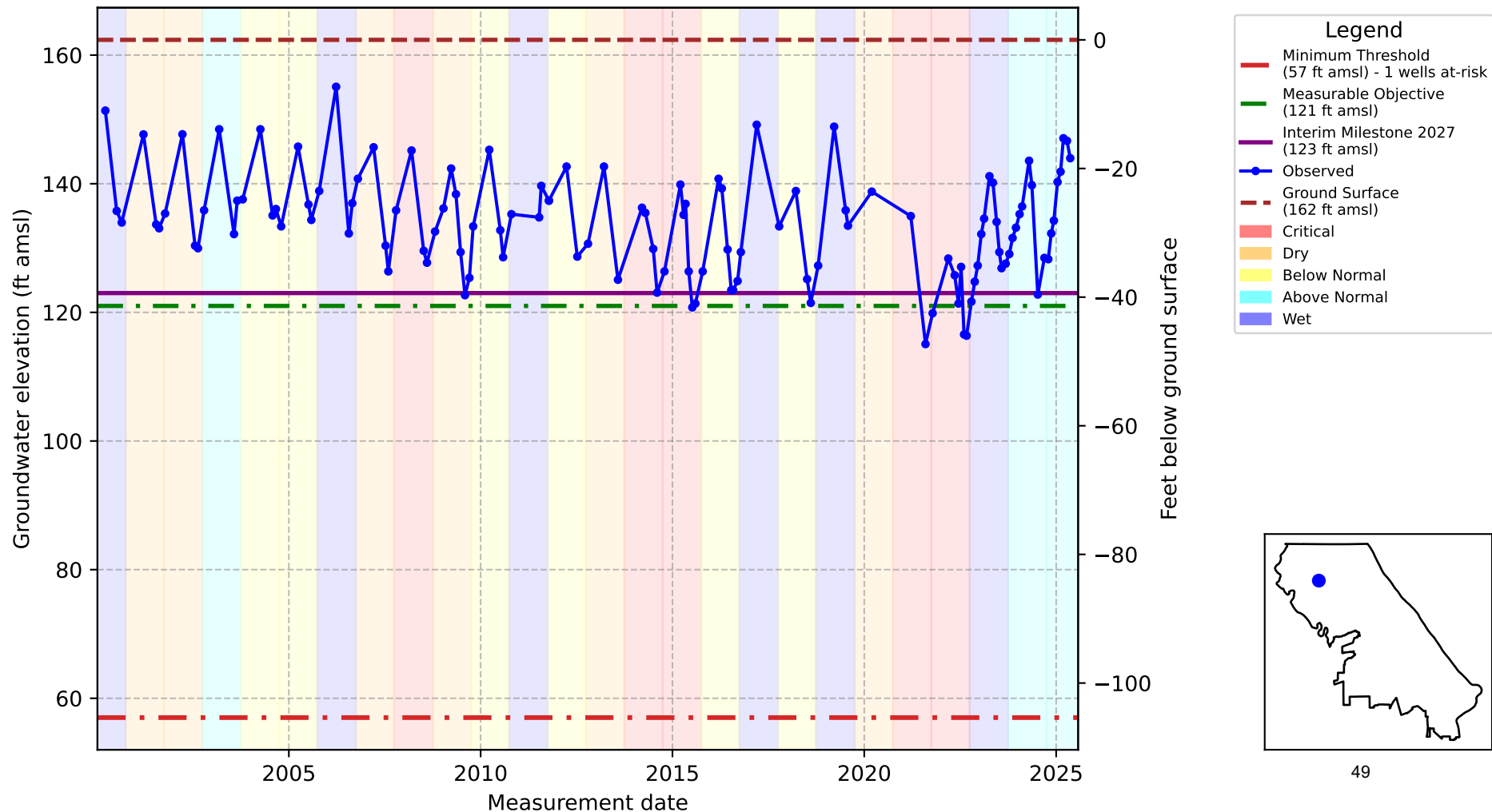
Alternative 2: Revised MT



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

Alternative 2: Revised MT

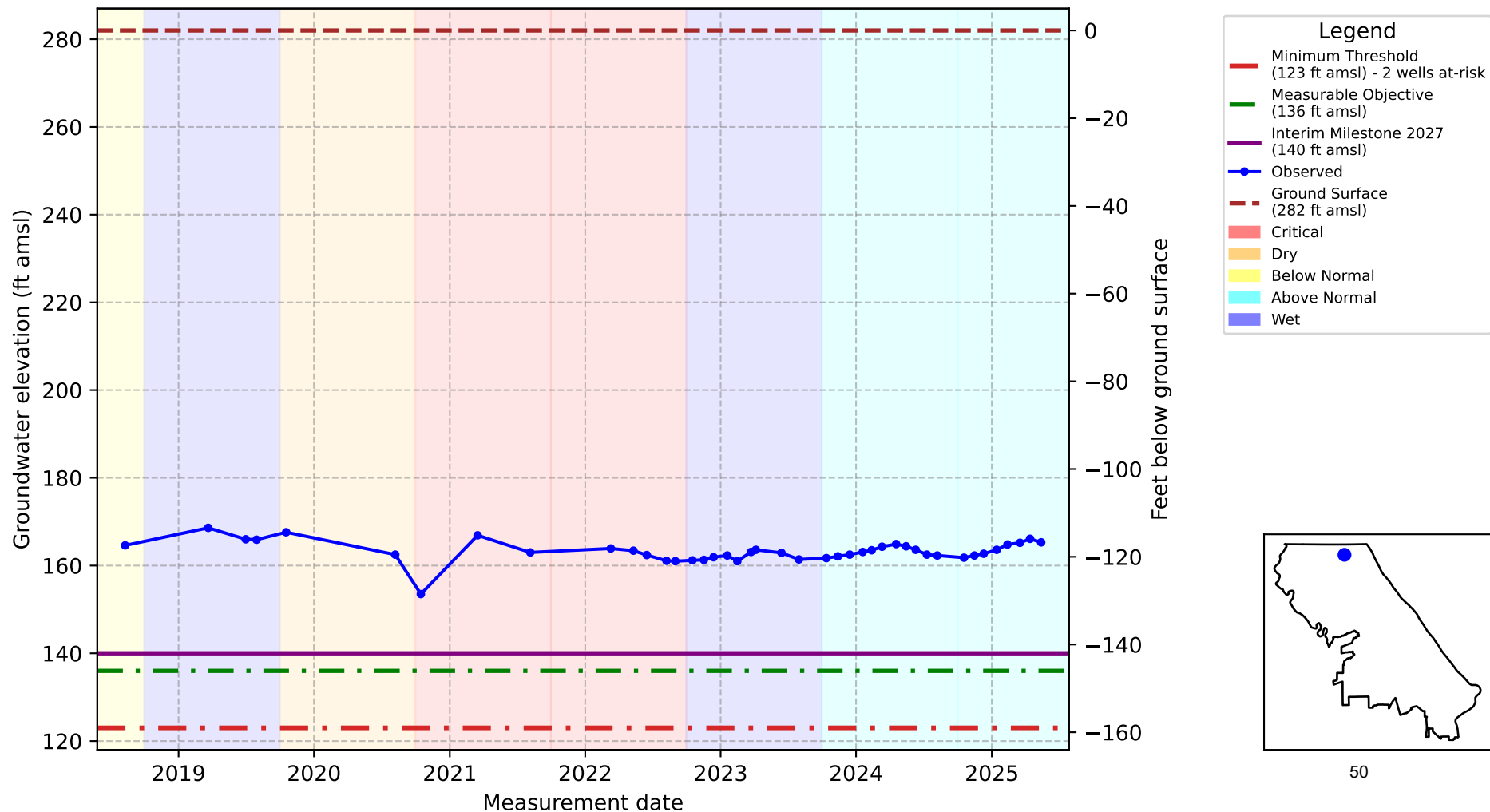
Total Number of Domestic Wells = 15



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

Total Number of Domestic Wells = 32

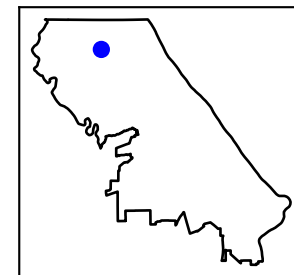
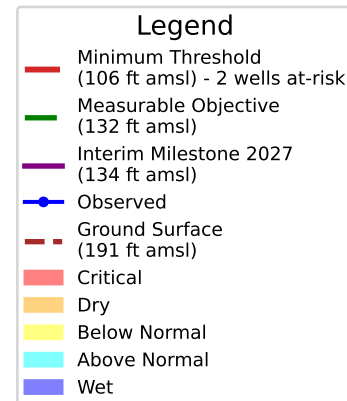
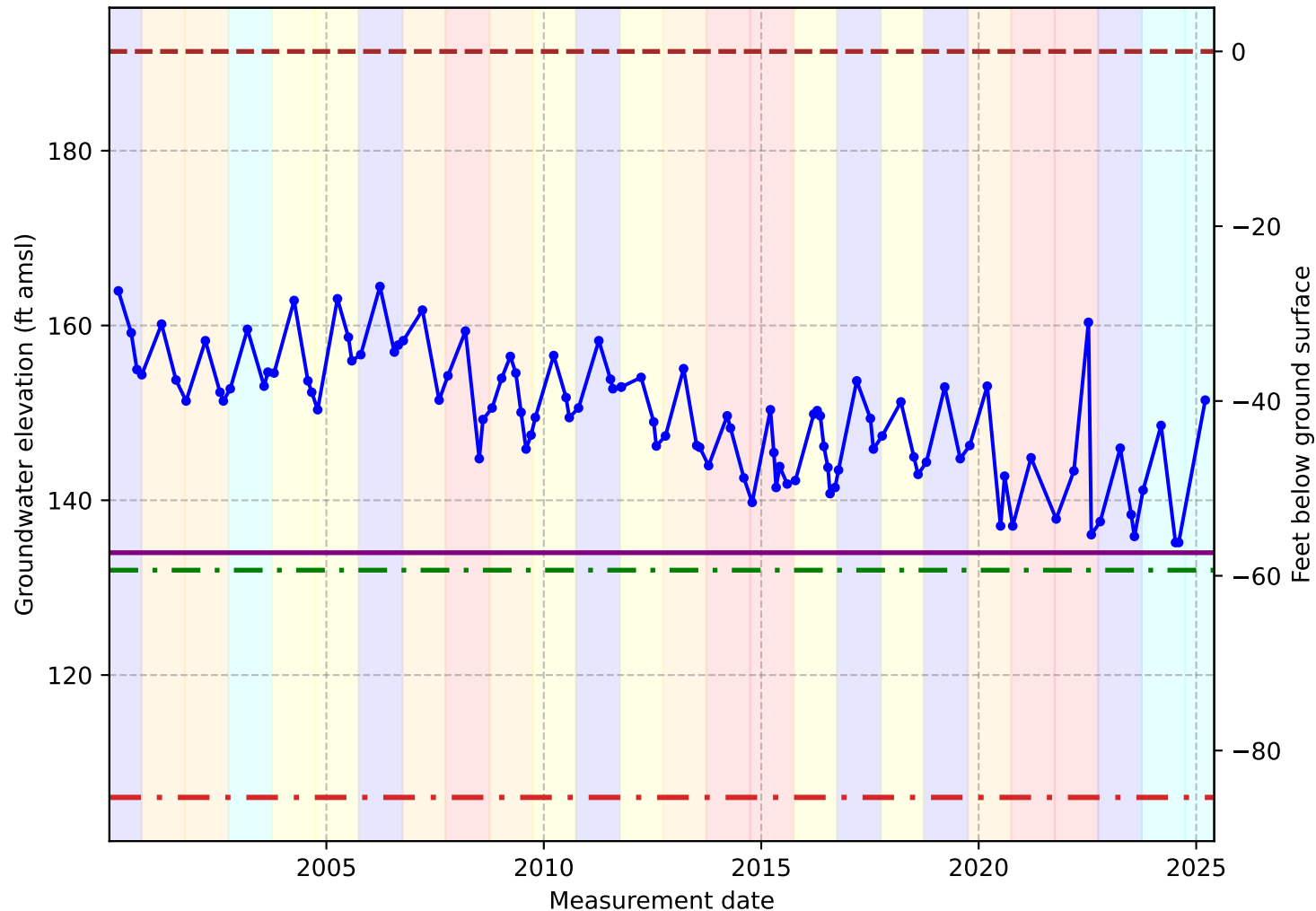
Alternative 2: Revised MT



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

Alternative 2: Revised MT

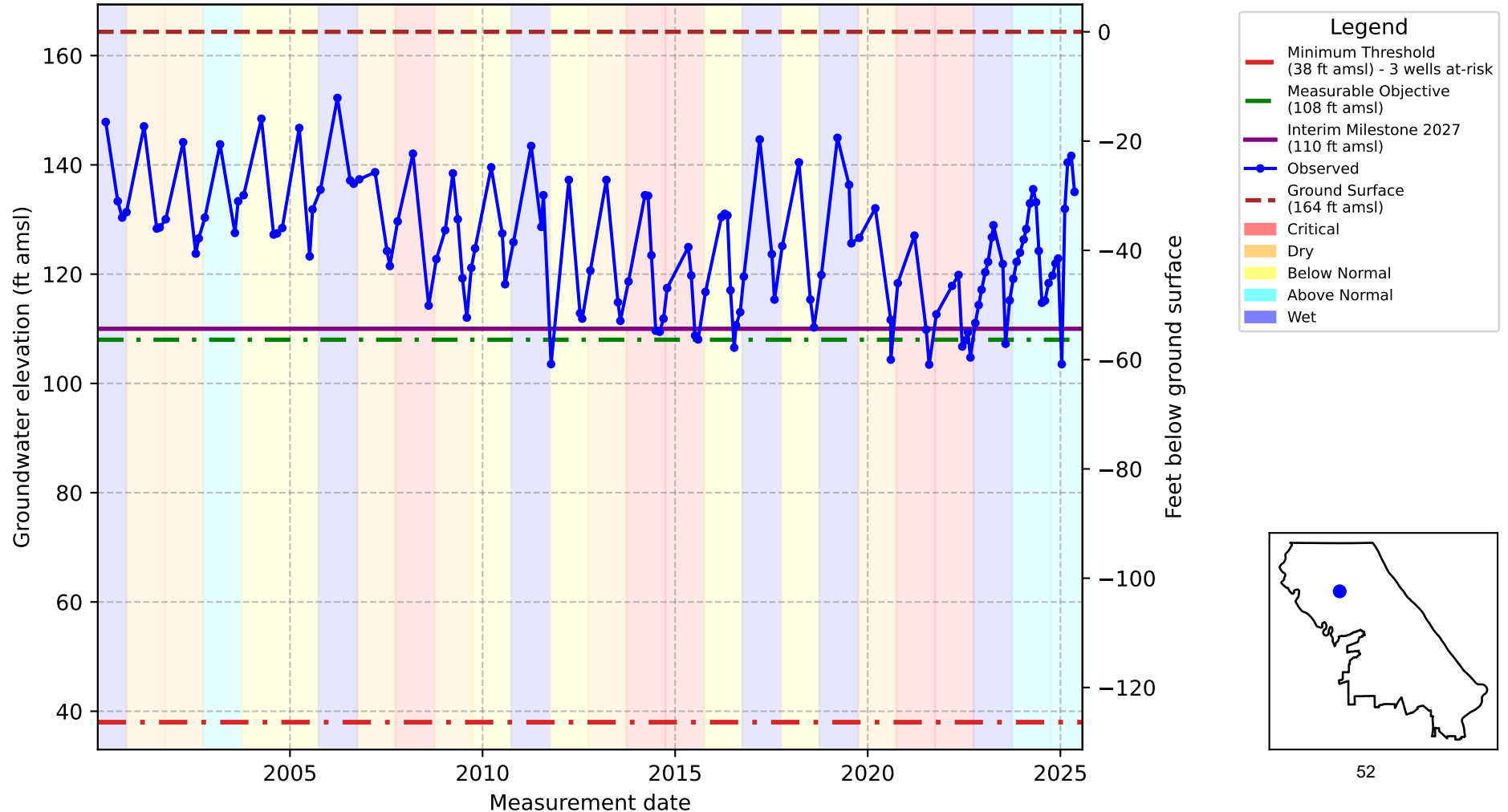
Total Number of Domestic Wells = 30



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

Total Number of Domestic Wells = 53

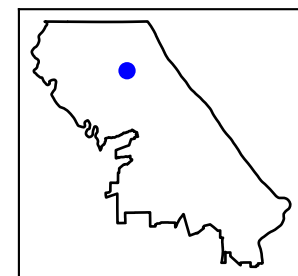
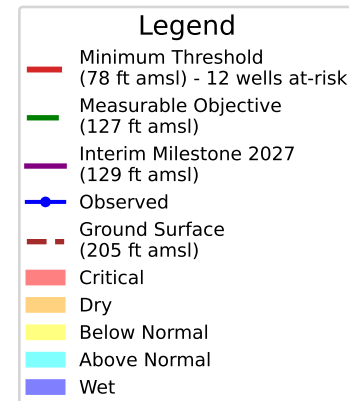
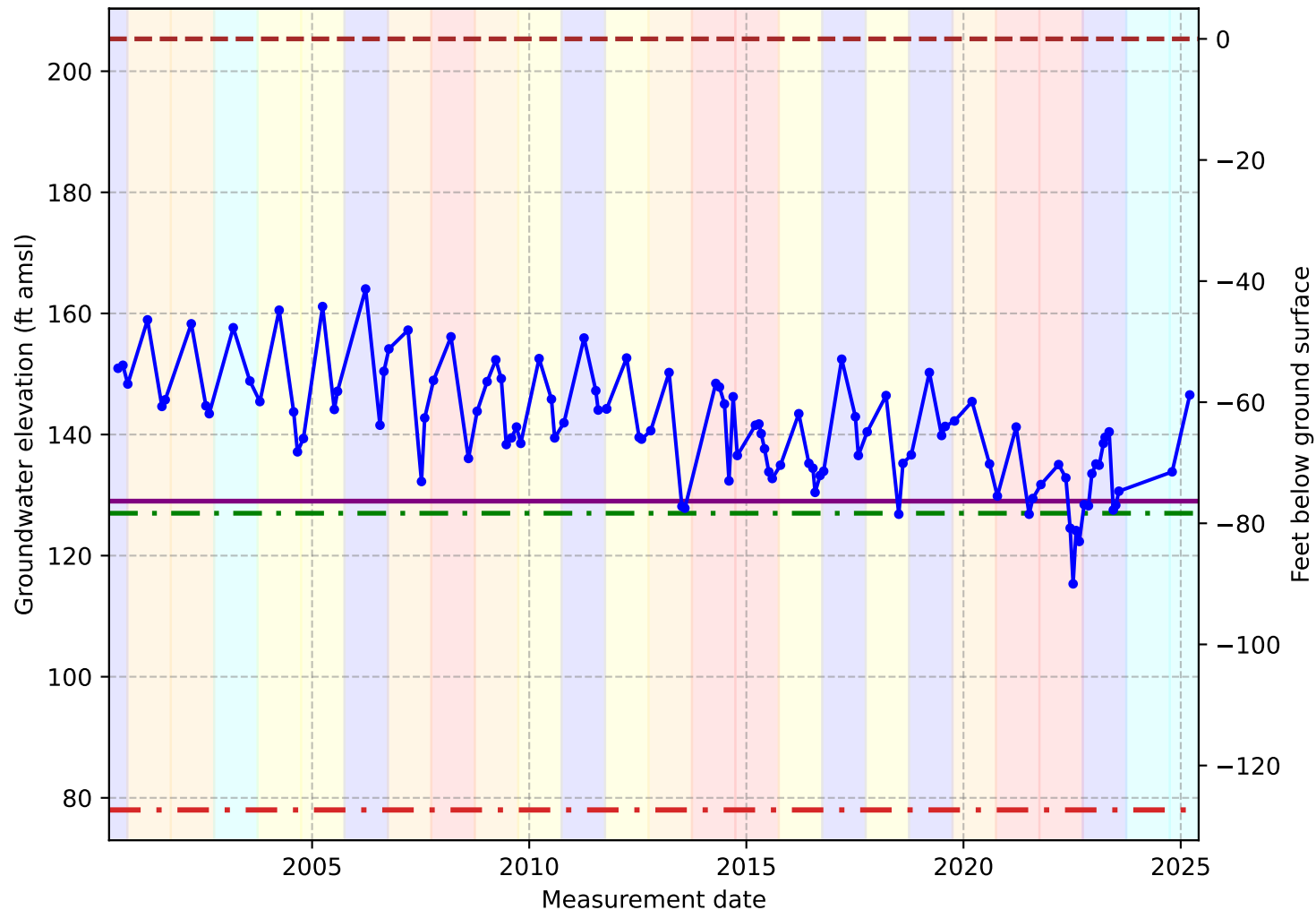
Alternative 2: Revised MT



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

Alternative 2: Revised MT

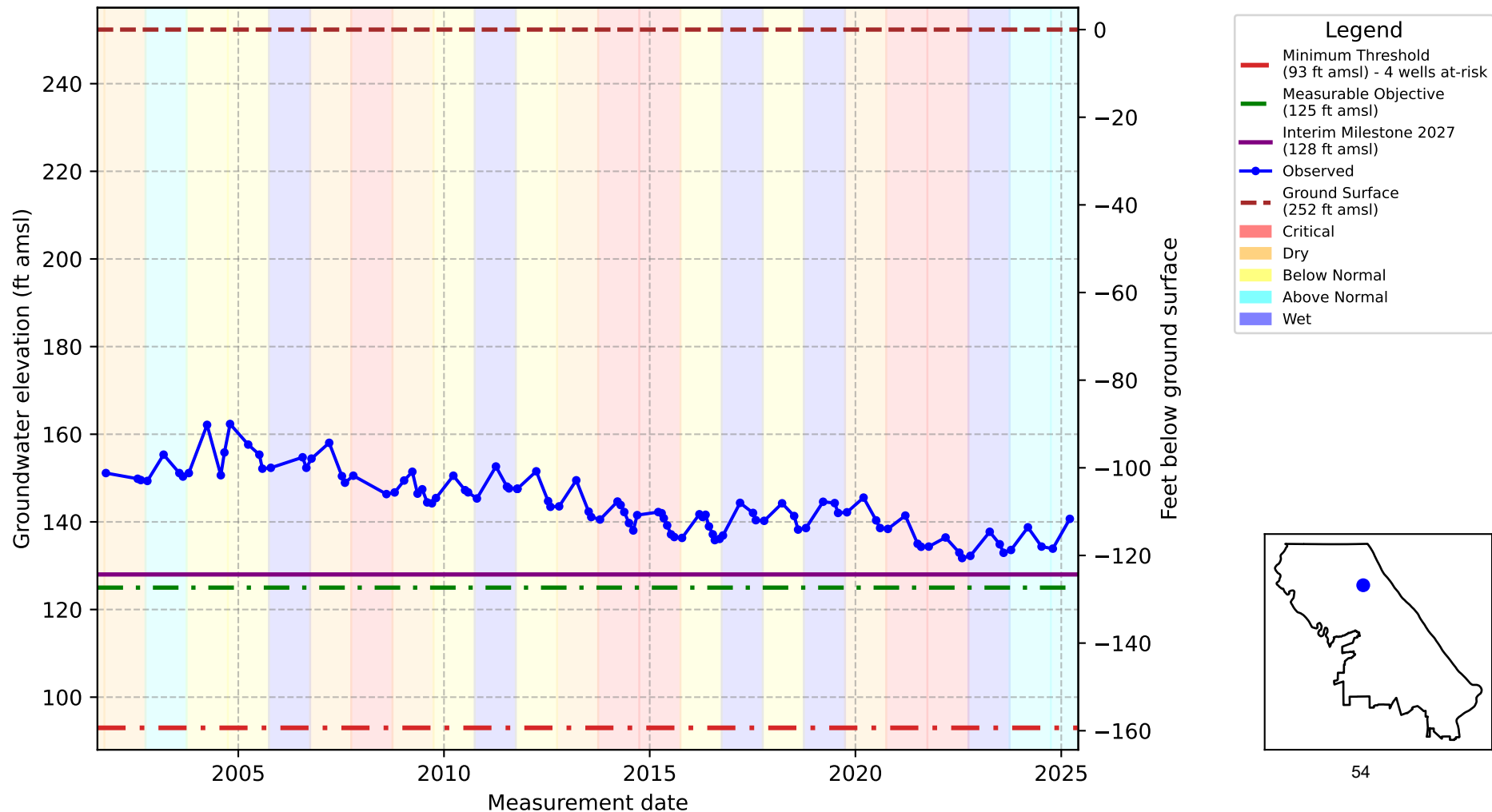
Total Number of Domestic Wells = 239



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

Total Number of Domestic Wells = 88

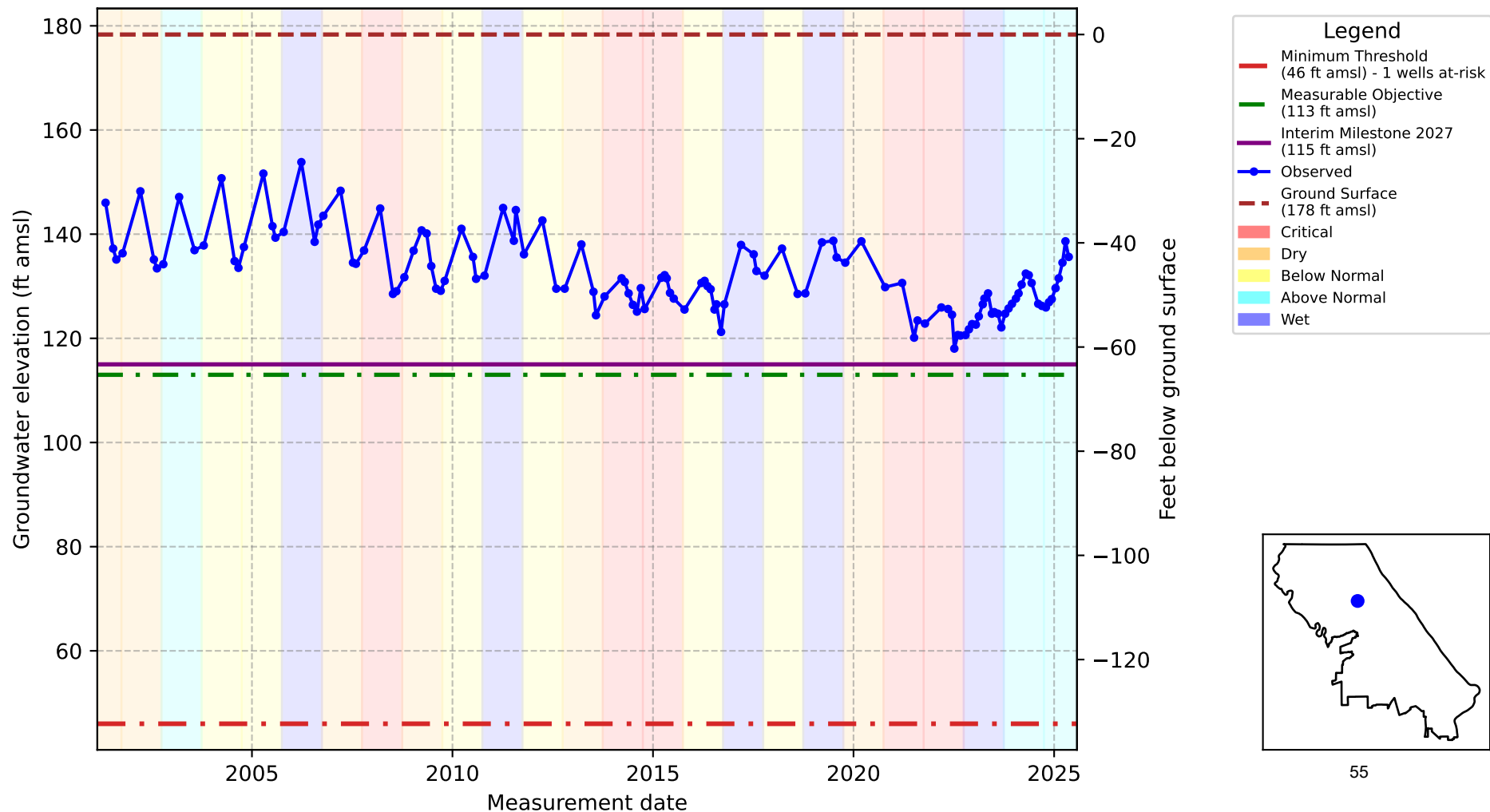
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 12

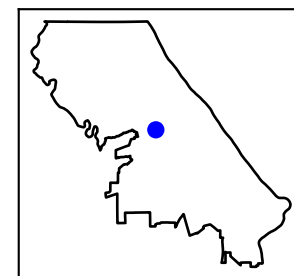
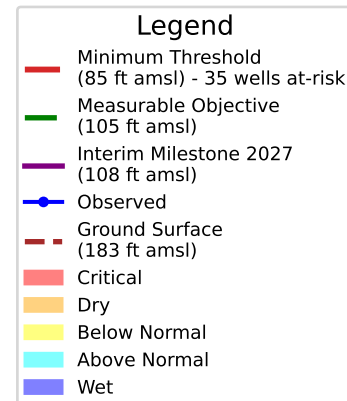
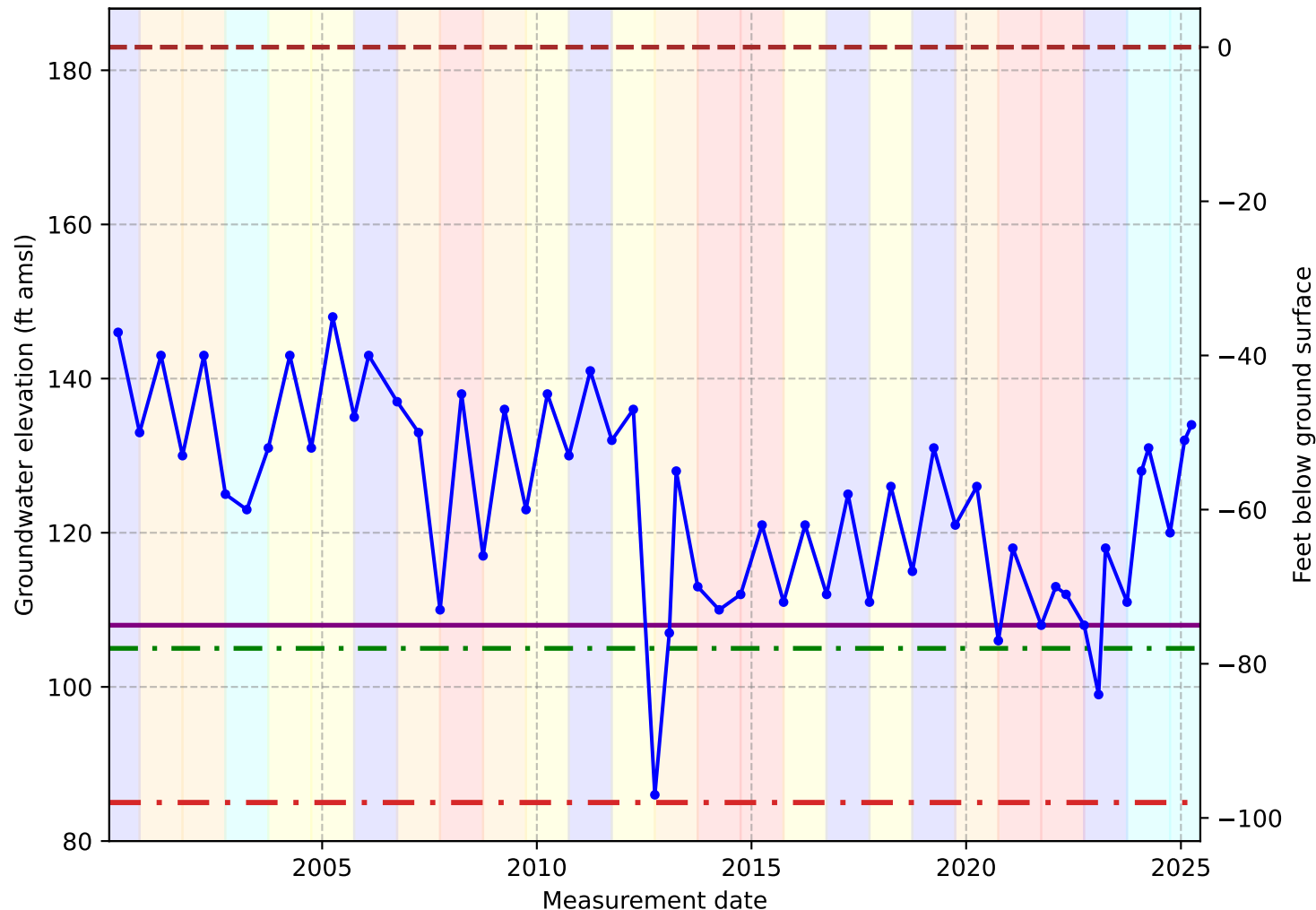
Alternative 2: Revised MT



Vina Subbasin - State Well Number (SWN): CWSCH02

Total Number of Domestic Wells = 387

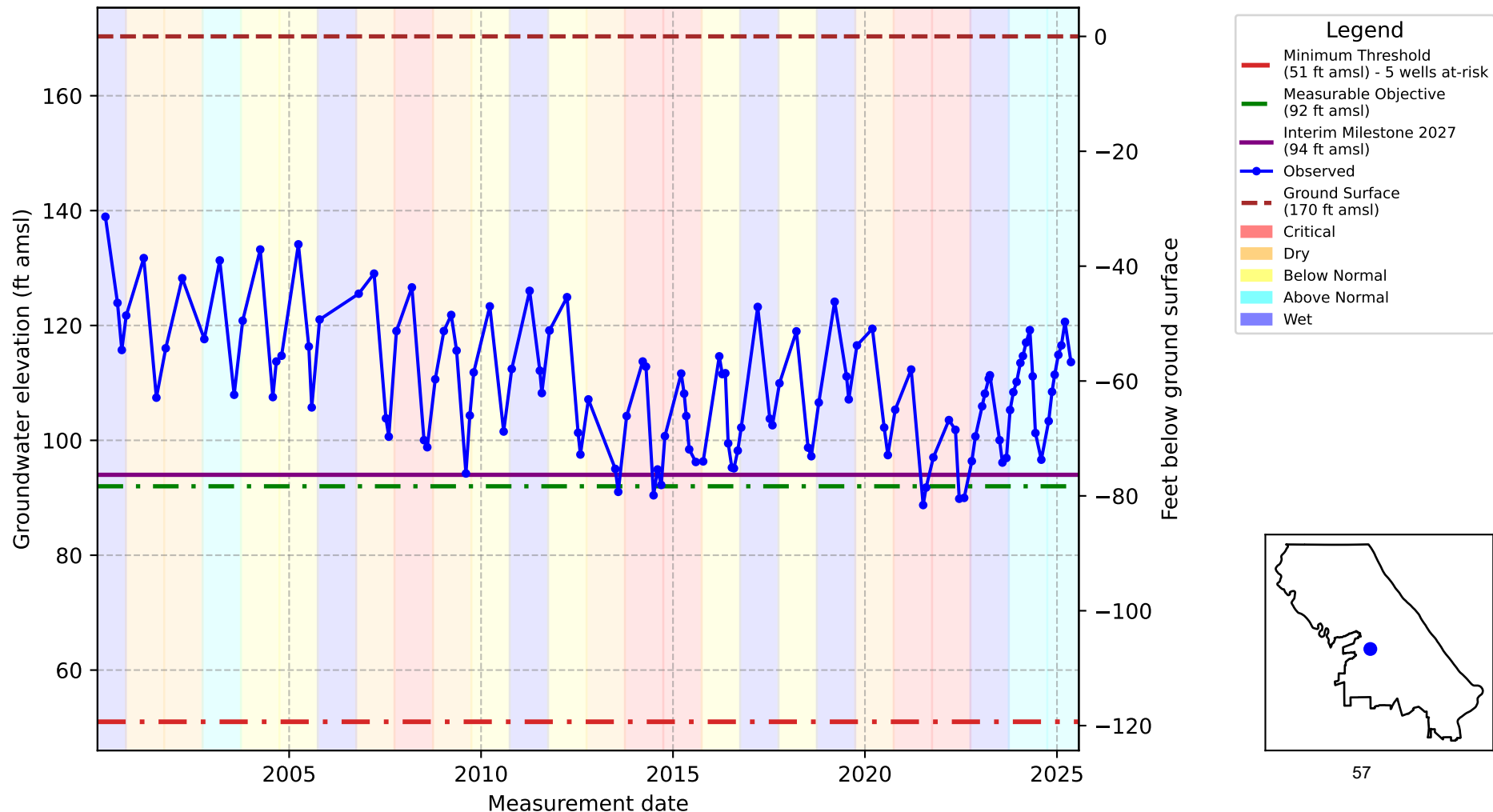
Alternative 2: Revised MT



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

Alternative 2: Revised MT

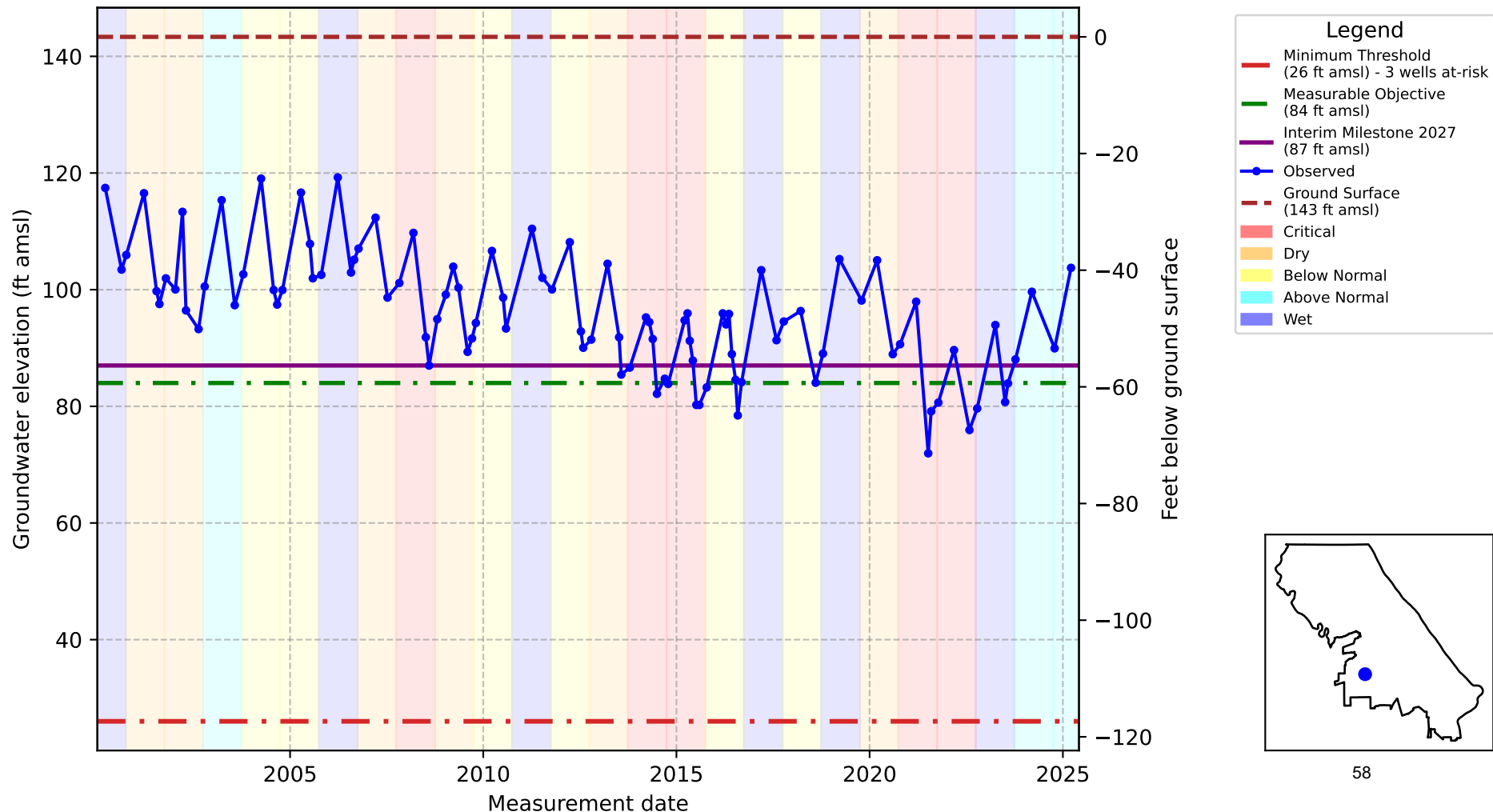
Total Number of Domestic Wells = 105



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

Alternative 2: Revised MT

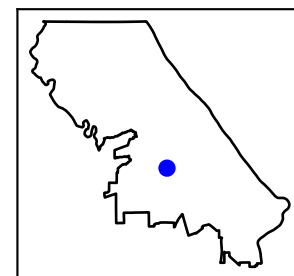
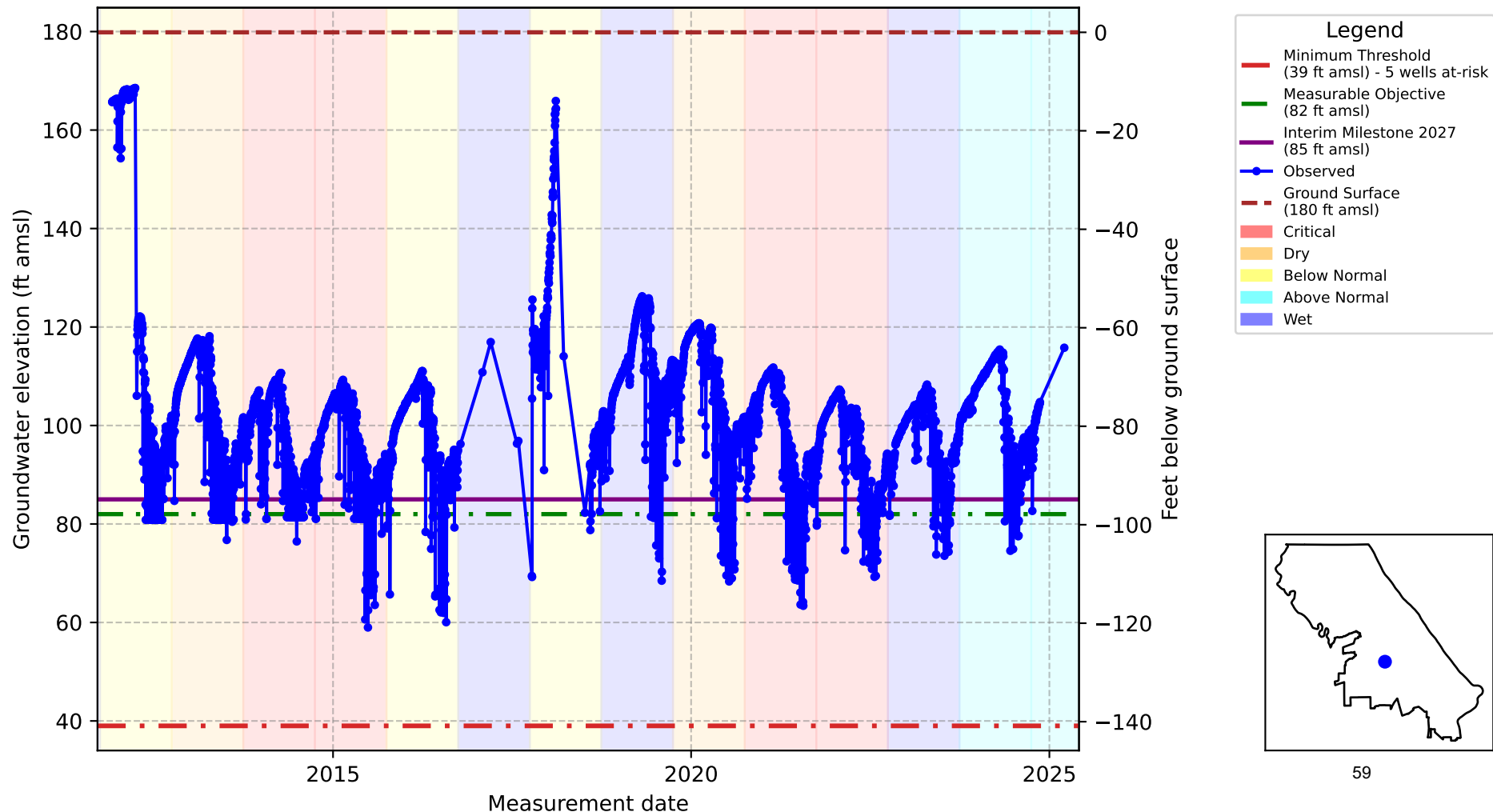
Total Number of Domestic Wells = 61



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

Total Number of Domestic Wells = 28

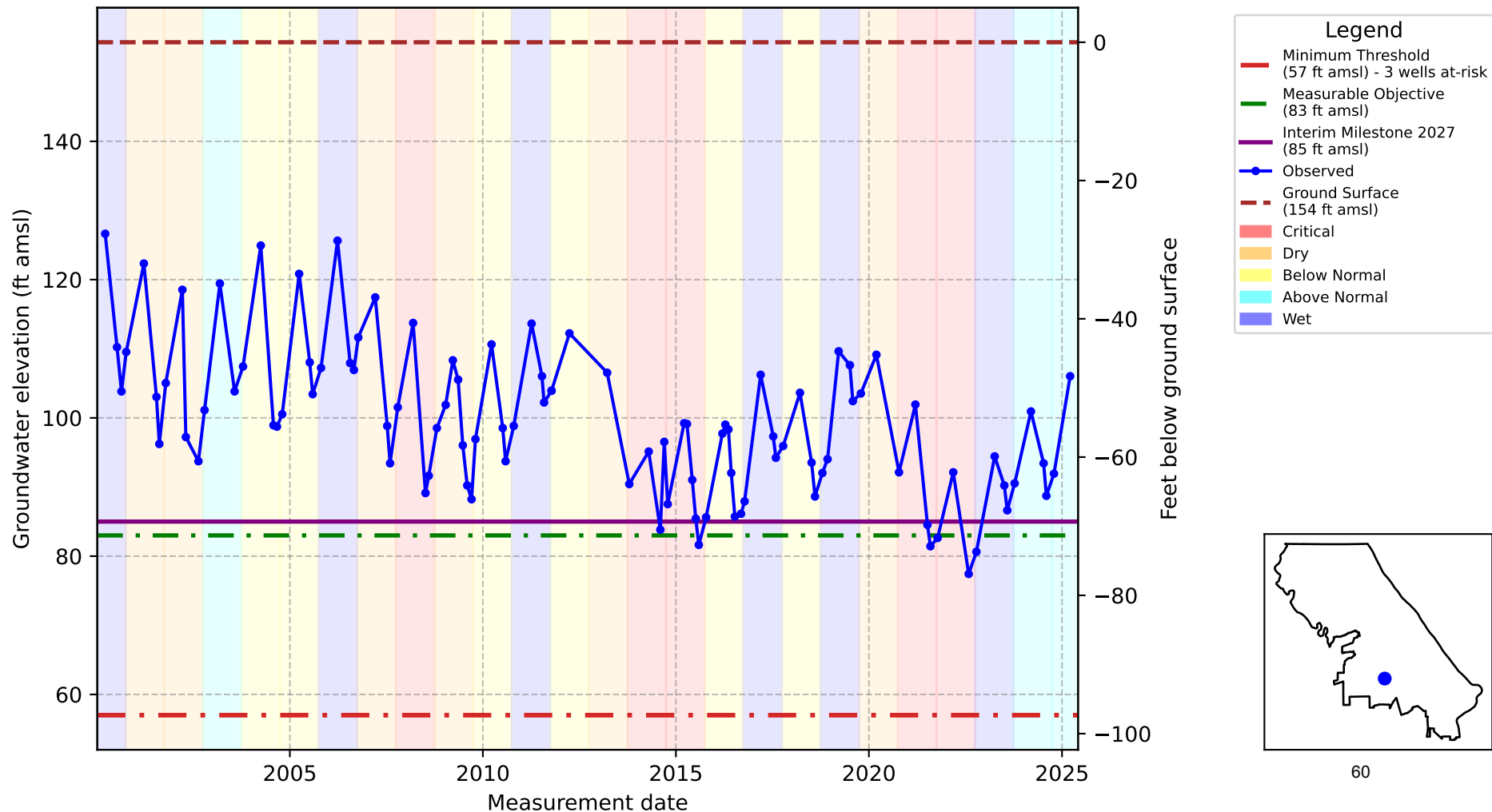
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 27

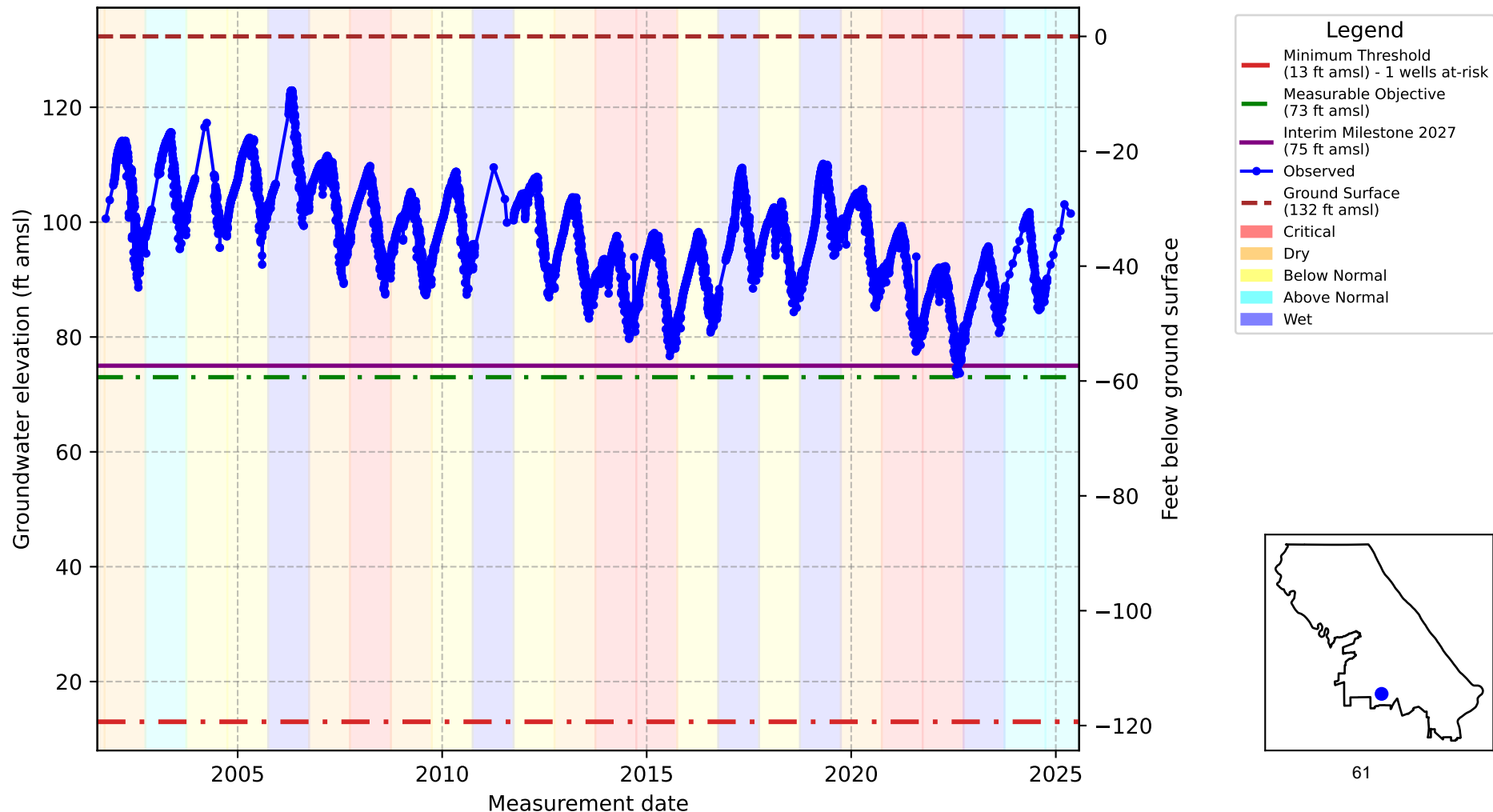
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 15

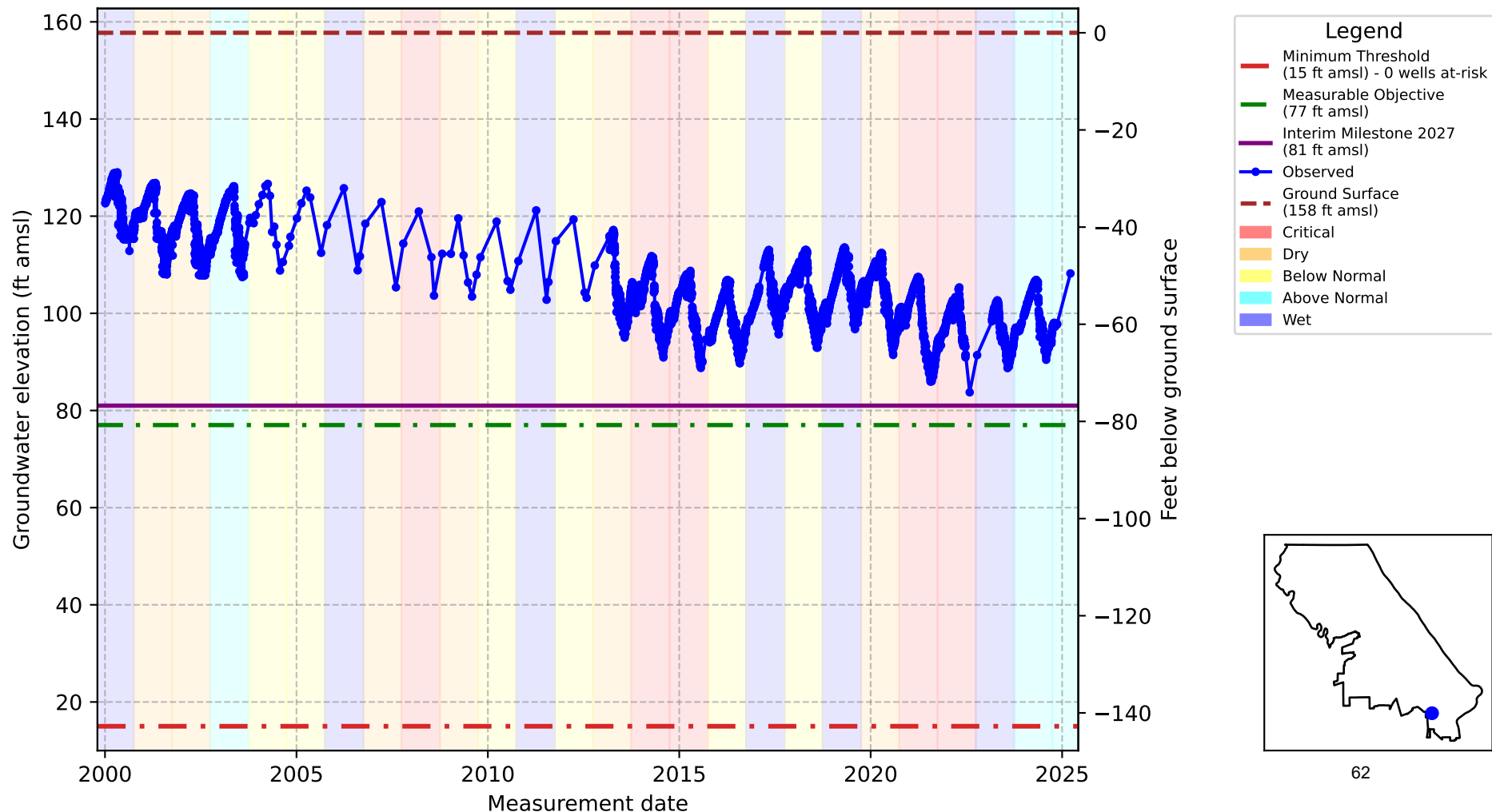
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 7

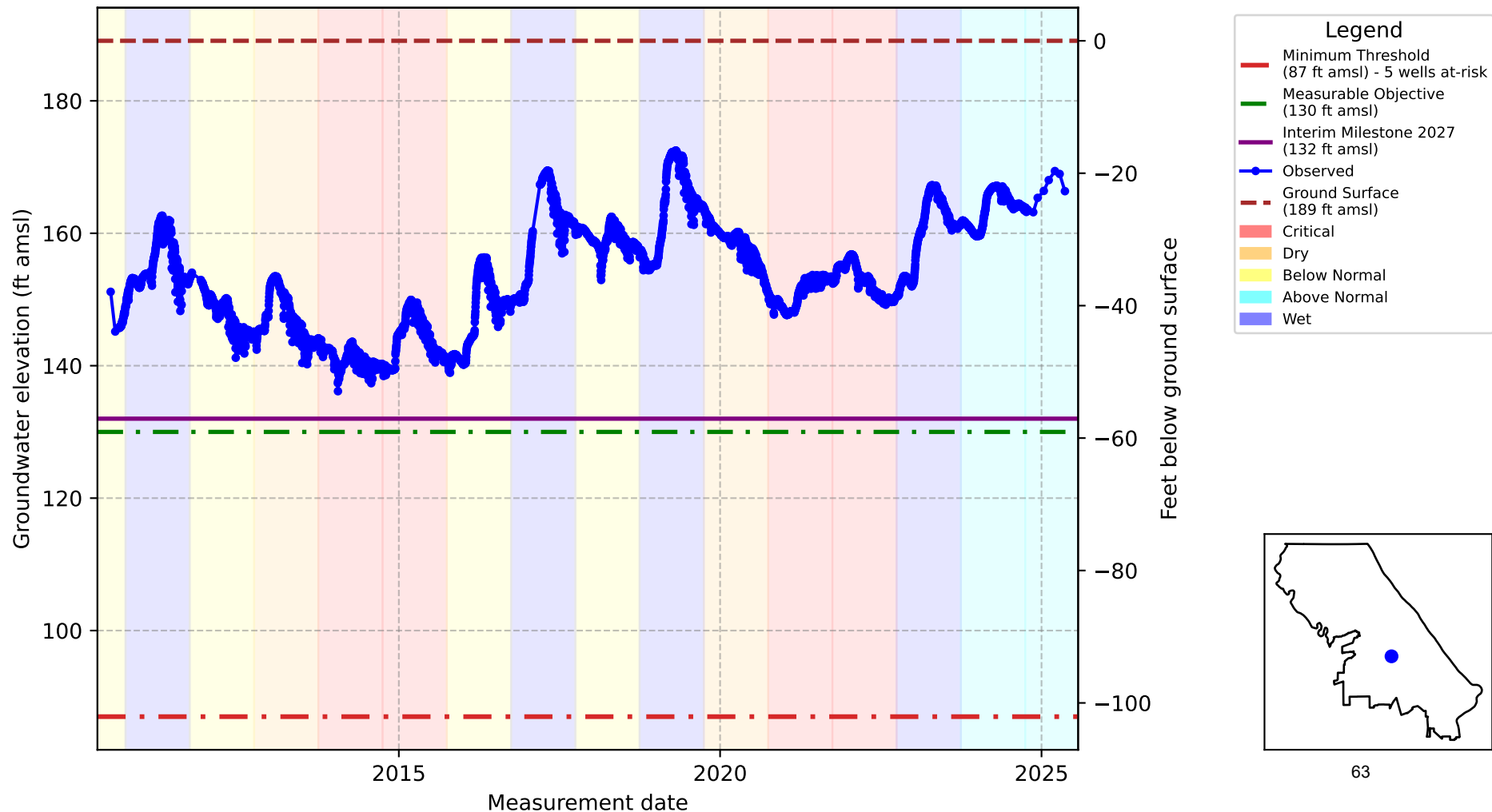
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 92

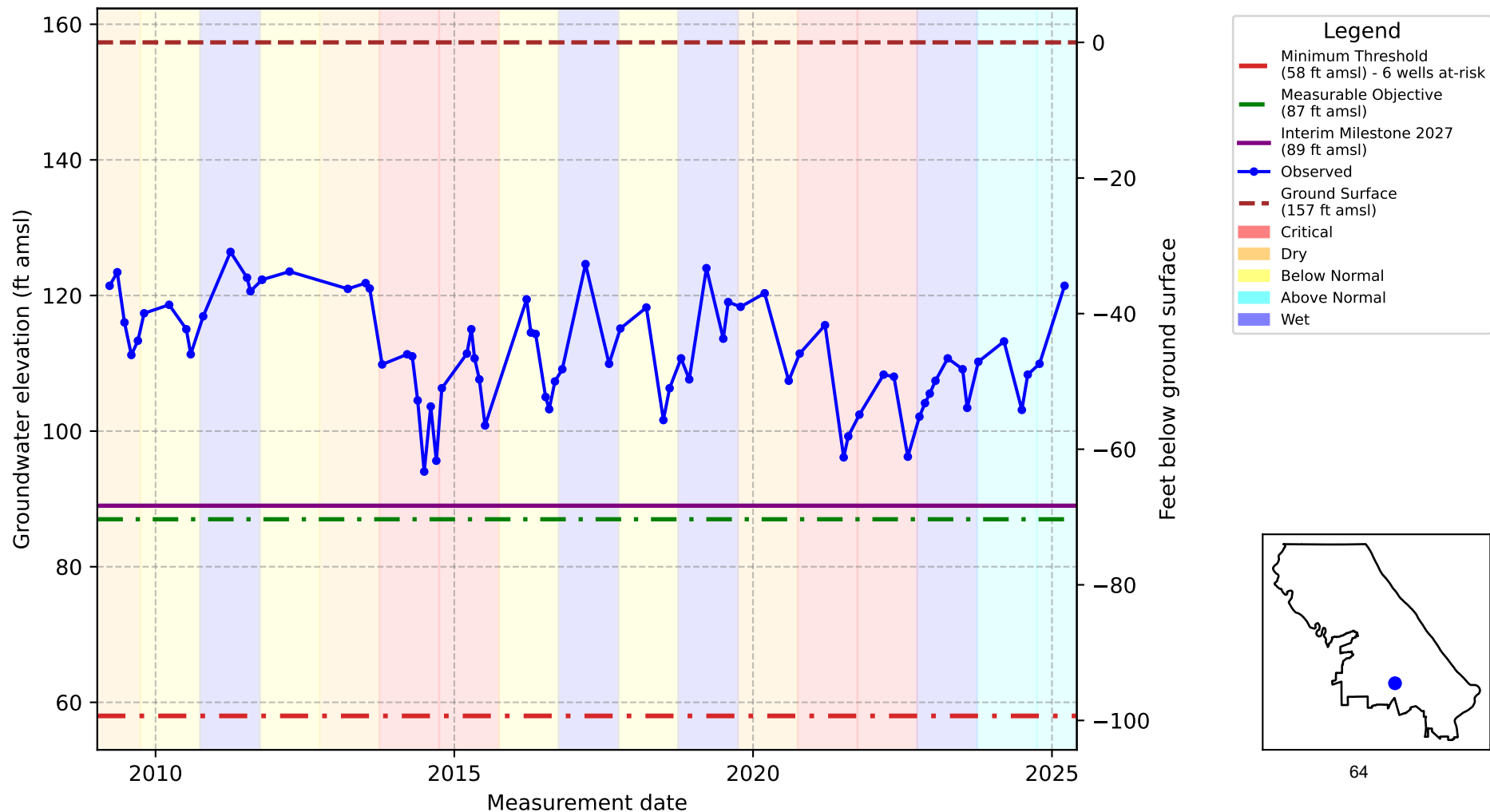
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 110

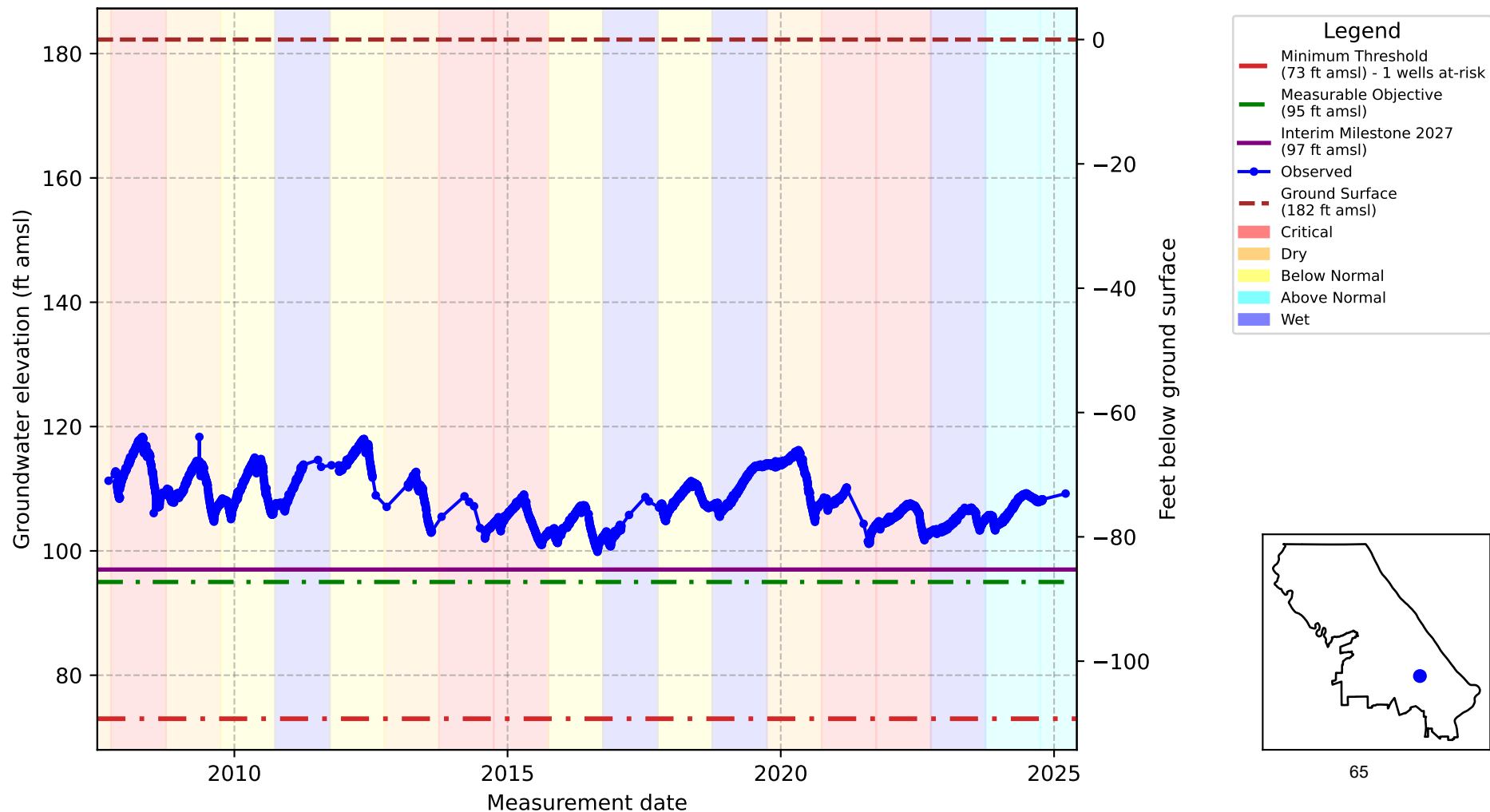
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 20

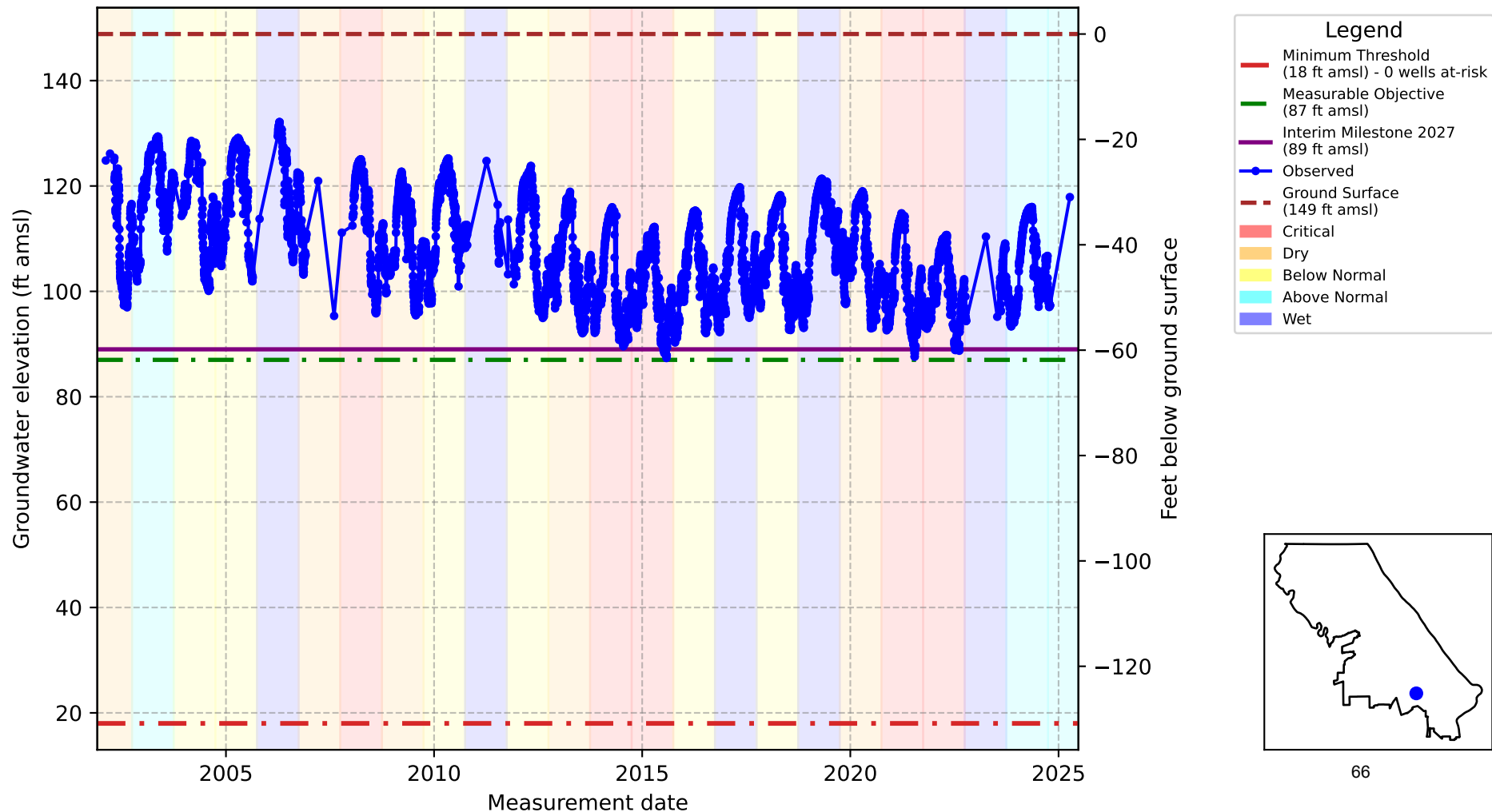
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 2

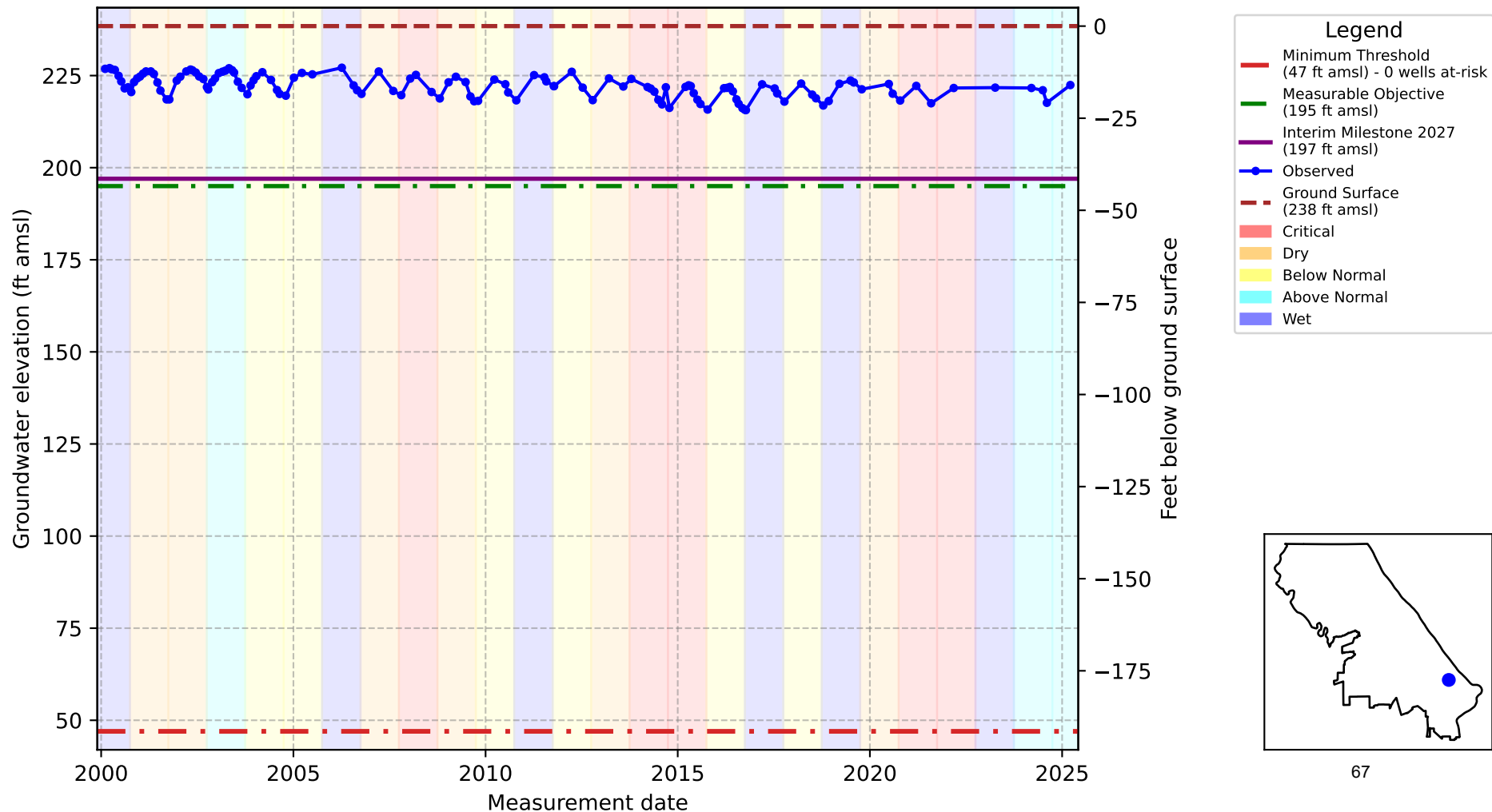
Alternative 2: Revised MT



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

Total Number of Domestic Wells = 7

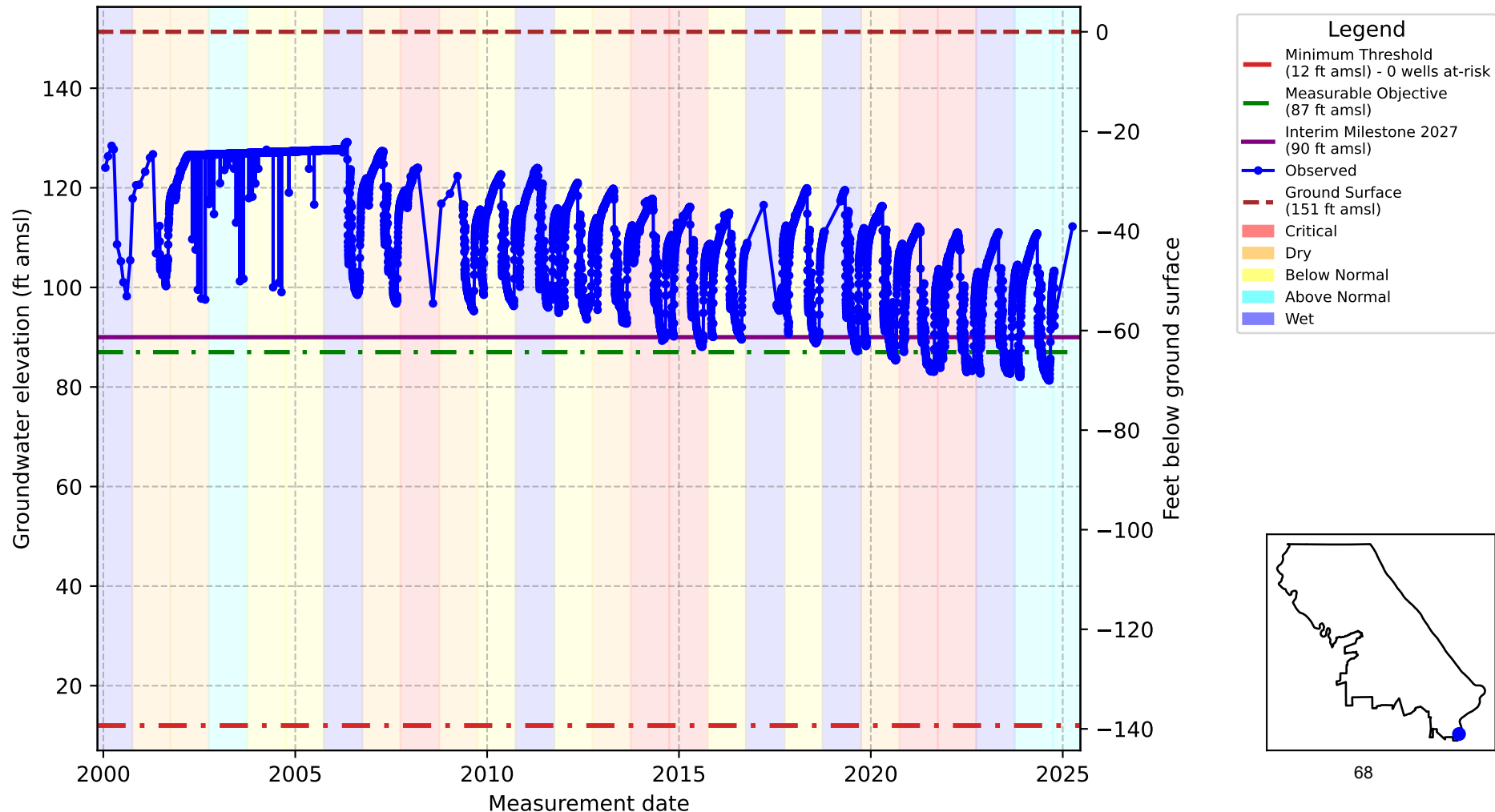
Alternative 2: Revised MT



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

Alternative 2: Revised MT

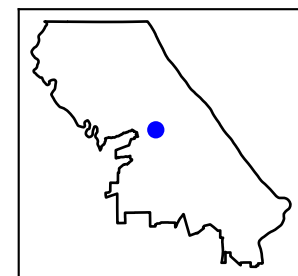
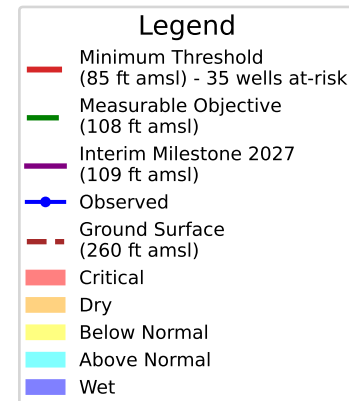
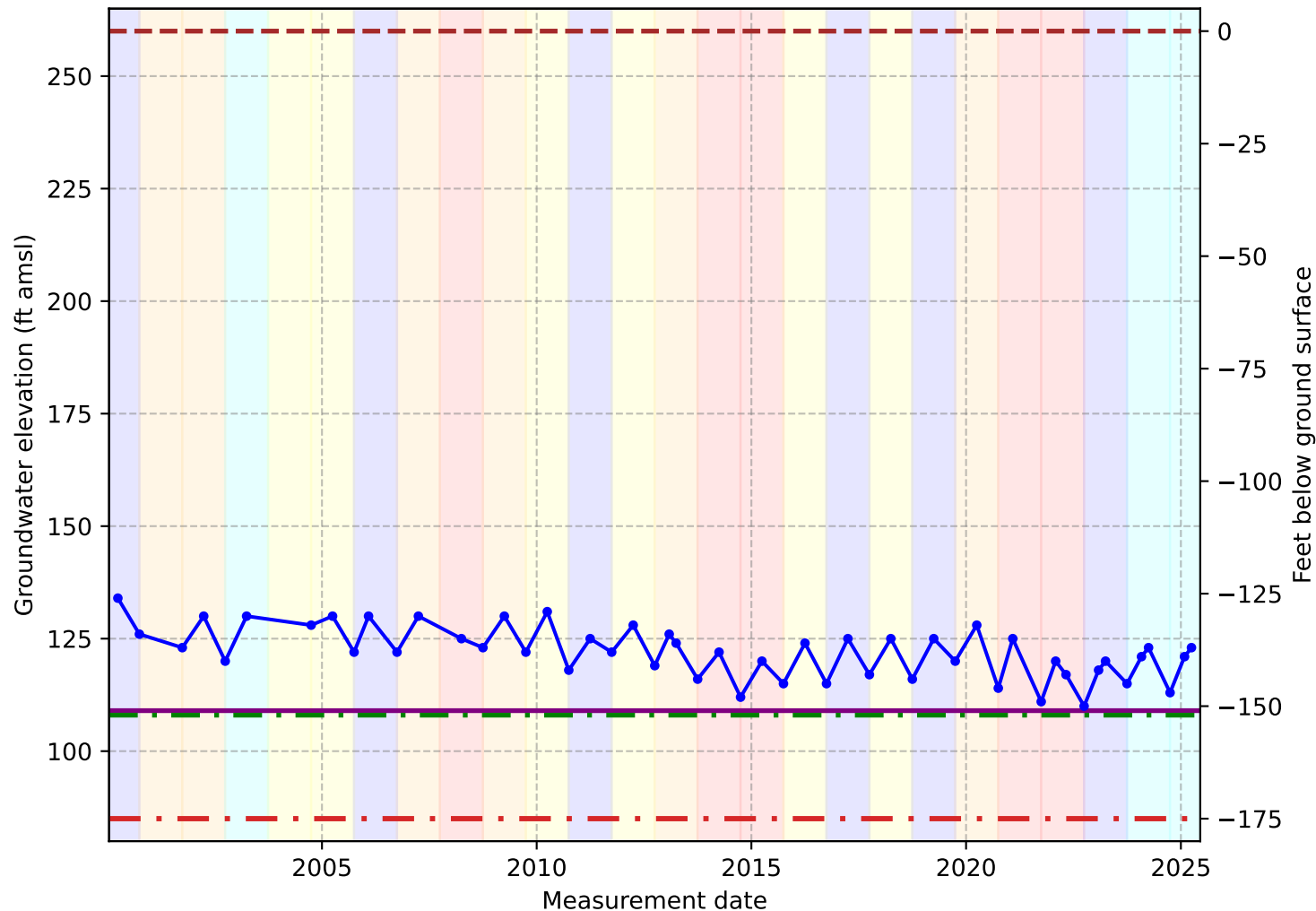
Total Number of Domestic Wells = 2



Vina Subbasin - State Well Number (SWN): CWSCH03

Total Number of Domestic Wells = 387

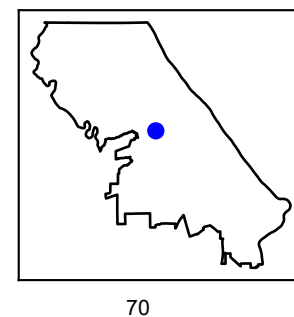
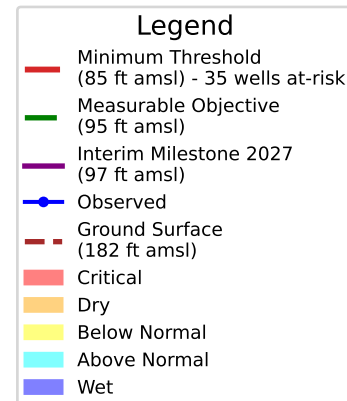
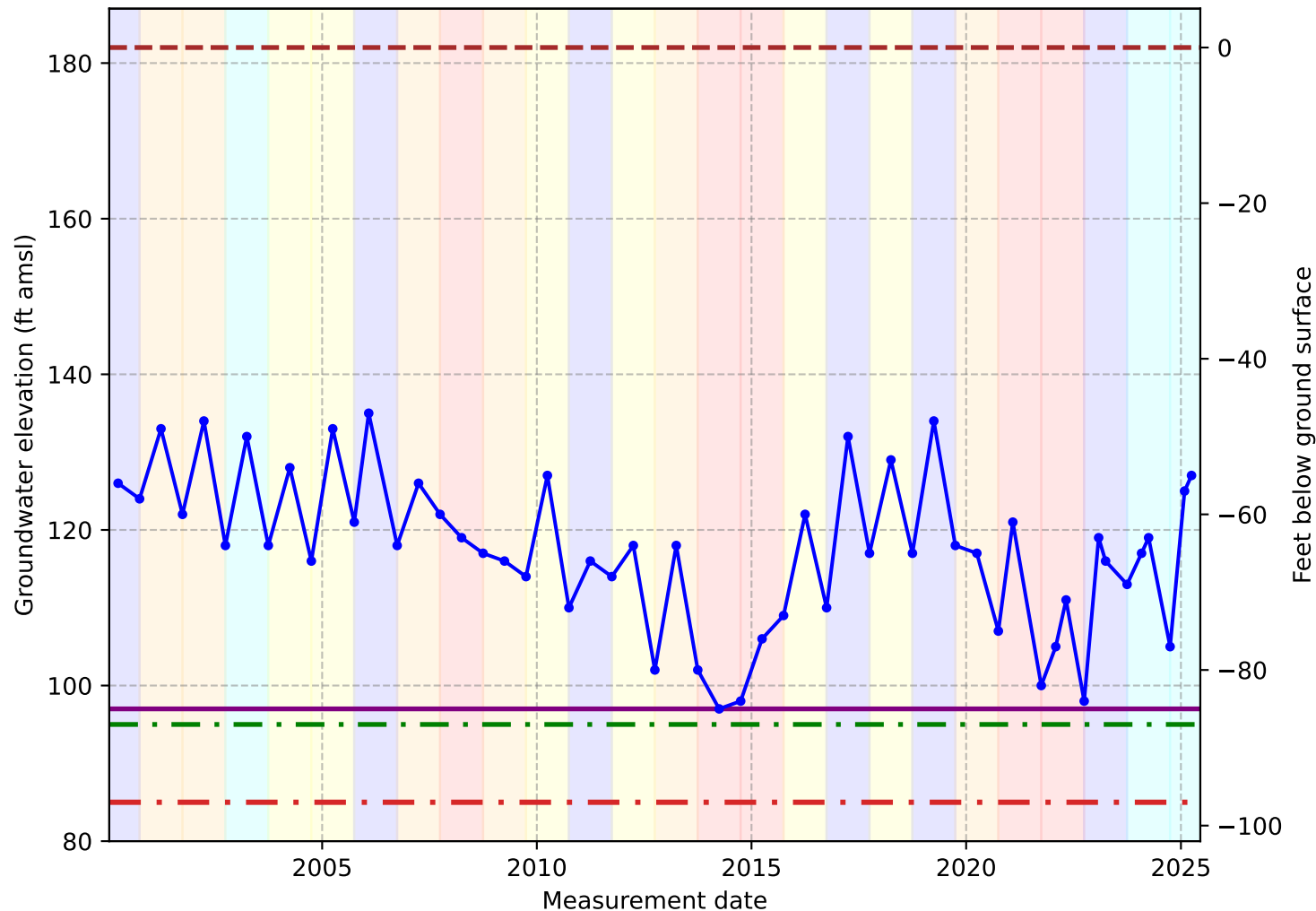
Alternative 2: Revised MT



Vina Subbasin - State Well Number (SWN): CWSCH07

Total Number of Domestic Wells = 387

Alternative 2: Revised MT

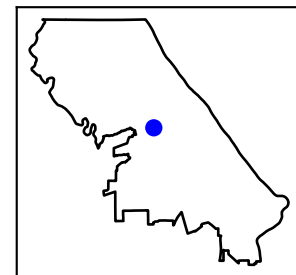
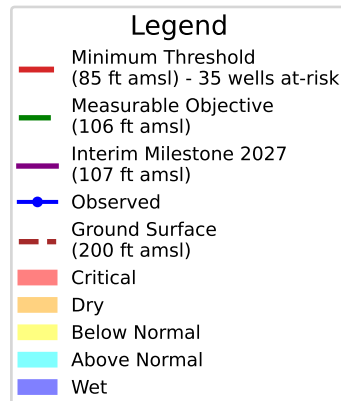
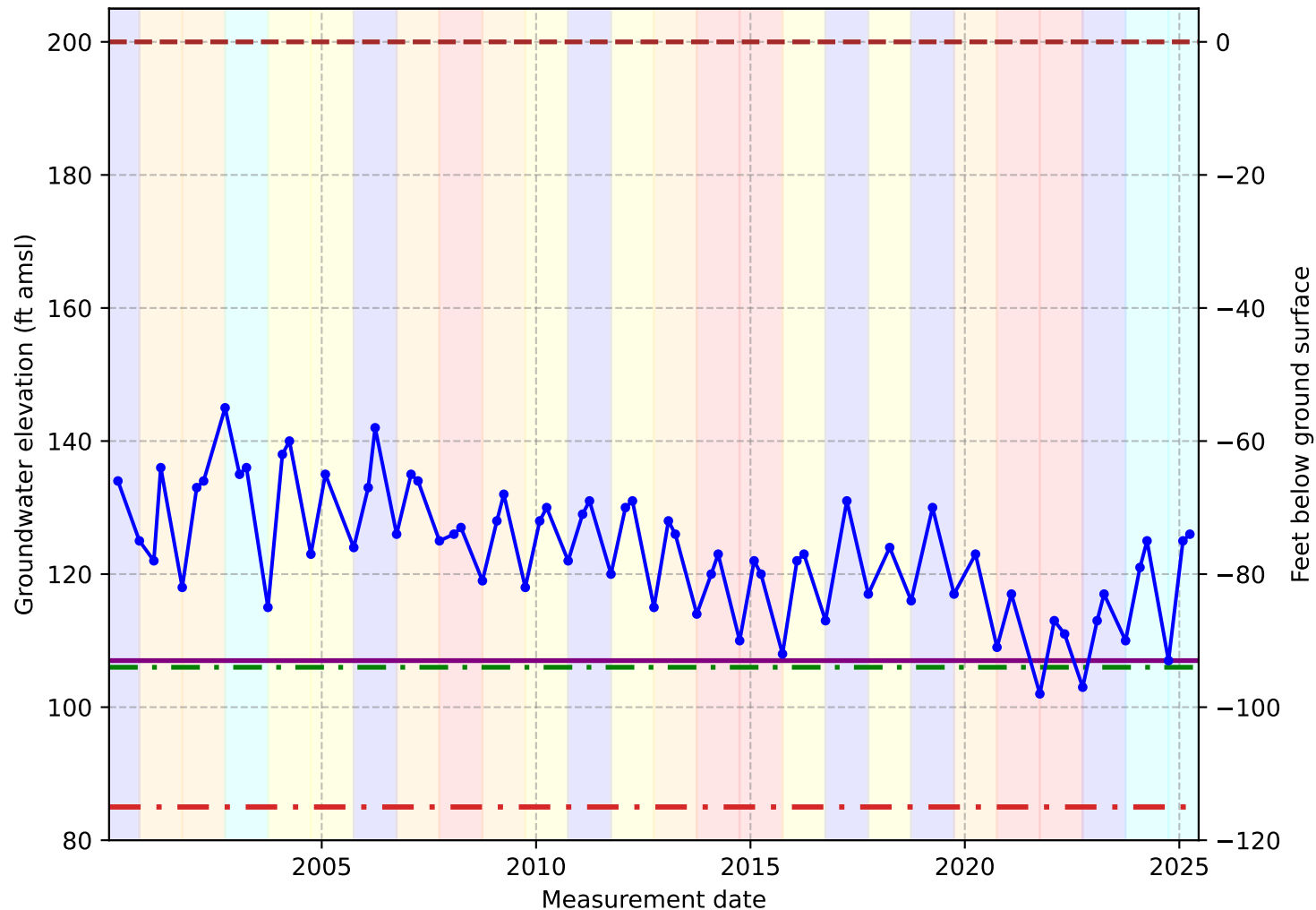


70

Vina Subbasin - State Well Number (SWN): CWSCH01b

Total Number of Domestic Wells = 387

Alternative 2: Revised MT



Attachment C.

Vina GSA — Groundwater Level Strawman

Summary of Stakeholder Perspectives

Purpose

This document summarizes the range of stakeholder input received on the Groundwater Level Strawman across recent stakeholder meetings and public comment opportunities. It is intended to help the Board quickly see the spectrum of perspectives as it considers action on three items on behalf of the Vina Groundwater Sustainability Agency (GSA): the Representative Monitoring Site (RMS) network, Local Management Levels (LMLs), and the Sustainable Management Criteria (SMC) — specifically the Minimum Thresholds (MTs) and Measurable Objectives (MOs).

Clarifying questions raised at these meetings are not included here, and individual comments are consolidated by topic rather than repeated each time they were raised.

Meetings and Public Comment Opportunities

- Discussion with environmental representatives and domestic well users community members – June 22, 2026
- Stakeholder Advisory Committee (SHAC) Meeting – June 24, 2026
- Discussion with environmental, domestic well, and agricultural community members – July 6, 2026
- Public Comments – July 8, 2026 Vina GSA Board Meeting (including two written comments)
- Public Comments – July 14, 2026 Groundwater Levels Public Workshop

Summary of Stakeholder Perspectives

1. Representative Monitoring Site (RMS) Network

- There was broad, and at SHAC unanimous, support for expanding the RMS network. Stakeholders across meetings felt the benefits — more accurate and representative data on change in storage — outweigh the drawbacks.

2. Local Management Levels (LMLs)

- Views on LMLs spanned a wide range. Some stakeholders do not support LMLs as currently proposed, feeling they carry no real consequences, and would prefer to simply raise MTs instead.
- Environmental representatives felt the proposed strawman does not go far enough, describing it as not a true middle-ground approach. They expressed a preference for a more expansive option that includes changes to MTs and

pointed to Wyandotte Creek GSA's approach for MTs, along with other neighboring subbasins, as models worth reviewing.

- Others support LMLs as a reasonable starting point, but want them applied to more RMS wells than the 5 currently proposed.
- An agricultural representative felt MOs are already set aggressively and viewed the combination of LMLs and additional RMS wells as a reasonable middle ground, while cautioning against unintended consequences from further regulatory action.
- A recurring theme across nearly every meeting was that LMLs, as proposed, are not tied to a regulatory “hook” or enforcement mechanism, while MTs are. Multiple stakeholders — including some SHAC members, environmental representatives, and members of the public — said LMLs need real consequences (such as demand reduction) to be meaningful, with some specifically suggesting LMLs be tied to ecological thresholds. As currently structured, LMLs direct advisement or monitoring only.

GDE Mapping and the ESA Study

- Multiple stakeholders raised concerns about the Environmental Science Associates (ESA) study used to map Groundwater Dependent Ecosystems (GDEs) — specifically the adequacy of the underlying dataset and the rooting-depth assumptions used. Environmental representatives are seeking an independent, outside review of the study and want monitoring extended to all polygons in the subbasin rather than only the 5 currently identified as sensitive GDE areas.
- Some stakeholders felt the GDE analysis should not be used for decision-making until more information is available on other water sources, and suggested annual GDE monitoring as an interim measure.
- Some also felt the definition of “groundwater” itself needs to be revisited and more clearly defined.

3. Sustainable Management Criteria (SMC): Minimum Thresholds (MTs) and Measurable Objectives (MOs)

- There was strong and repeated support — from several SHAC members, environmental representatives, and domestic well owners — for raising the MT to a more protective level. Commenters noted the current MT is set below historical lows and is up to four times lower than neighboring subbasins, which some argued exposes the GSA to liability for effects on neighboring subbasins.
- One written commenter pointed to Wyandotte Creek GSA's September 2025 SMC amendment as a specific model: setting the MT to the deeper of (1) the 5th percentile of nearby shallow domestic wells or (2) a specified distance below the historic low (the lesser of the historical range or 20 feet), with the MO set to the 2015–2025 average groundwater level.
- There was broad support for setting MOs higher than historic lows, which stakeholders felt would signal improved intention and provide a meaningful

buffer; one participant noted MOs currently function as a guideline rather than a regulatory tool.

- Domestic well owners and representatives raised strong concerns about the exclusion of wells drilled before 1980, as well as wells within the Cal Water and Durham Irrigation District service areas, from the Groundwater Sustainability Plan (GSP)'s risk analysis — arguing this significantly under-estimates the number of wells at risk of going dry. They preferred a “working well” definition over a fixed cutoff year, consistent with Department of Water Resources (DWR) guidance, and asked that these wells be included in the analysis with protection provisions for damages from groundwater depletion.
- There was broad support for a proactive approach to well mitigation — preventing problems before they occur — rather than costly mitigation after the fact. One commenter noted that raising the MT would also help protect groundwater-dependent landscapes and urban forests.
- All participants at one meeting supported removing the “non-dry year” language from the definition of undesirable result, consistent with a DWR Recommended Corrective Action (RCA); this was echoed by a public commenter who separately objected to the current definition (two non-dry years in a row) and asked that the regulation be designed to protect domestic wells.
- One written commenter argued that DWR's approval of the Vina GSP is conditional, not final, and that RCAs require rectification rather than being optional — cautioning that unaddressed RCAs could result in the GSA being referred to the State Water Resources Control Board (SWRCB) for intervention. The same commenter argued that framing protections for domestic well owners and GDEs as a regulatory “threat” is misguided, and that the GSA Board has a responsibility to protect less-capable groundwater users — including domestic well owners and GDEs — who cannot otherwise defend their interests against heavier pumping.
- Multiple commenters requested that the Board direct staff to complete a more thorough risk/benefit analysis comparing a lower versus a higher MT before finalizing this decision.
- Separately, an environmental commenter asked that agricultural water users change irrigation practices to use less water, and expressed a general desire to protect environmental interests in this process. Another commenter raised concern about agricultural influence over GSP policy more broadly and asked how the GSA insulates itself from outside influence.

Other Suggestions

- One member of the public, who works with biochar, expressed support for its use and its potential effects on groundwater management. This was not otherwise discussed at stakeholder meetings and may warrant further staff evaluation outside the scope of this decision.

Item 4.2.3 Public Comments Received

Public Comments received via the comment forms or received emails related to DWR Recommended Corrective Actions and Groundwater Level SMC topics May 2026 through August 5, 2026.

From: [Markey, Evan](#)
To: [Vina GSA Public Comments](#)
Subject: July 22nd SHAC Meeting
Date: Tuesday, August 4, 2026 3:27:49 PM

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Unfortunately, I was out of town and missed the July 22 SHAC meeting. I understand the official tally stands as voted, but I'd like the Boards to have my positions on the four items as they consider the package on August 12:

1. GSP amendment (non-dry-year language): I would have voted against removal. The language should stay in the plan.
2. Groundwater level SMC: I support the RMS network expansion as presented. Between the two alternatives, I would have voted for Alternative 1, adding the 14 LML polygons at MO minus 20 feet, and against Alternative 2's revised minimum thresholds.
3. Projects and management actions: I support bringing the new concepts into the plan as Other Projects, not as Management Actions.
4. Water quality RCA response: I support the staff recommendation.

Thank you for considering my input on these items.

Evan Markey
Vina GSA Stakeholder Advisory Committee Member

Evan Markey

District Manager

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From: Todd J Greene

Sent: Monday, August 3, 2026 9:50 PM

To: VINAGSAPUBLICCOMMENTS@CHICOCA.GOV

[<VINAGSAPUBLICCOMMENTS@CHICOCA.GOV>](mailto:VINAGSAPUBLICCOMMENTS@CHICOCA.GOV)

Subject: Public comment for Vina sub-basin GSP Periodic Evaluation regarding RCA 3

This public comment is directed to the Vina GSA Board regarding the 5-year GSP Periodic Evaluation. I am a professor of Geology at Chico State and a member of the Vina sub-basin SHAC (Stakeholder Advisory Committee) as the "Water Scientist" and I am on the LEG (Local Expert Group). Although the 2022 GSP was approved by DWR, they had a number of Recommended Corrective Actions (RCAs), and I'd like to point you towards RCA 3. In particular, I'd like to address RCA 3b and 3c that have to do with Minimum Thresholds (MTs) and Measurable Objectives (MOs), and the newly proposed Local Management Levels (LMLs).

MAIN POINT:

My main concern is that the current MT levels are way too low (averaging 63 feet below MO levels). The average historical range (highs to lows) of all RMS (Representative Monitoring Site) wells is approximately 20 feet for the last 25-year period. Current MT levels are set 3-4 times lower than that historical range! If current MT levels are reached, I would predict there would be catastrophic irreversible consequences such as subsidence issues, destruction of ecosystems that take generations to rebuild, and loss of groundwater storage. These MT levels are lower than our neighboring sub-basins, which causes problems with inter-basin coordination. And, since MT levels provide the only regulatory "hook" with regard to groundwater levels and storage, I believe this "hook" would come way too late to avoid permanent problems.

BACKGROUND:

Staff provided two alternatives to the SHAC for how the current state of how groundwater levels are monitored in the 29 RMS wells:

Alternative 1 keeps the 2022 GSP MT levels where they are and adds LMLs (15 feet below MO levels) to 14 of 29 RMS wells. I believe LMLs are a helpful non-regulatory alert that would warrant attention from staff and could possibly lead to mitigating actions. Using the post-1980 well database, Alternative 1 puts 18% (266 of 1472 domestic wells) "at-risk", meaning they are shallower than the MT levels. Keep in mind these numbers are minimums since they exclude pre-1980 wells.

Alternative 2 revises the 2022 GSP MT levels. The deeper of two options is used: 1) 20 feet below the MO, or 2) the level at which only 5% of post-1980 domestic wells are "at-risk". All 29 RMS wells (except 2) fall under the 2nd option. Also, there are no LMLs for Alternative 2. On average, Alternative 2 actually puts 6% of domestic wells "at-risk" (95 of 1472 domestic wells). The SHAC voted (5-2) for Alternative 2 led by my motion since this was the only alternative that raised most (but not all) MT levels. However, I now believe we can do better.

PROBLEMS WITH BOTH ALTERNATIVES:

Alternative 1 does nothing to the already too deep MT levels. Alternative 1 only adds LMLs to 14 of 29 wells, which I believe is insufficient to protect domestic wells and groundwater dependent ecosystems (GDEs) across the sub-basin.

Alternative 2 actually revises the 2022 GSP MT levels. Although on average Alternative 2 mostly moves MTs to a higher elevation and protects more domestic wells than Alternative 1, Alternative 2 still has MTs that are unusually low in some wells (even lower than Alternative 1 MTs) and has no LMLs. This is mostly because the post-1980 domestic well database is not consistent across all polygons. Some polygons have very few wells (as low as 1), while others have more than 300 wells. Therefore, Alternative 2's methodology of only holding 5% of domestic wells at-risk can produce very unusual MT elevation results for polygons with low well counts.

PROPOSED SOLUTION: ALTERNATIVE 3

Instead of relying solely on the domestic well database for establishing MT levels, Alternative 3 uses a straight 40 feet below MOs for each hydrograph (except the Chico Management Area wells, those are untouched). I chose 40 feet because the average historical range (highs minus lows) of hydrographs over the 25-year time period is about 20 feet. By choosing 40 feet below MO for MTs, we're allowing for TWO more drops of the historical range (instead of 3-4 drops of current MT levels) before MTs are reached. In other words, if we can't stop our water levels from dropping twice the historical range in 25 years, we're not managing our aquifer sustainably. Also, by choosing 40 feet below MOs, we can still see how many domestic wells are at-risk for each polygon, and there are not unusually low MTs due to low well counts in any polygon.

Alternative 3 still puts 6% of the domestic wells at risk (compared to 6% for Alternative 2 and 18% for Alternative 1). However, the average "operational range" (MO minus MT elevation) for Alternative 3 (39 feet) is much more reasonable than Alternative 2 (55 feet) or Alternative 1 (63 feet).

Alternative 3 also includes LMLs (15 feet below MO levels) for all wells except Chico Management Area (MA) wells compared to only 14 wells in Alternative 1 and 0 wells for Alternative 2. Alternative 3 provides a much-needed alert system across the entire sub-basin and provides alerts to help protect GDEs.

I've attached a number of items on this email for the Board to review and compare the different alternatives. They are very similar to the data you've received for Alternatives 1 and 2.

- The map is the same format as Alternative 1 and 2 maps, but the domestic well count numbers have been updated for each polygon for Alternative 3.
- The hydrographs that I'm including have a lot of information. They include: MOs, interim milestones, LMLs, and the MTs for Alternatives 1, 2, and 3. They also include the domestic well counts at-risk for Alternatives 1, 2, and 3 (these counts are a bit hidden, just look at the legends on the right side of the hydrographs).
- The table at the end includes a lot of numbers, but essentially is a repeat of what's on the hydrographs.

COMMON ARGUMENTS AGAINST RAISING MT LEVELS:

- *Why change MT levels if DWR isn't requiring us to do so?*

Just because DWR approved our GSP, that doesn't make it the right thing to do for our sub-basin. Look at the hydrographs and ask yourself if the current MT levels (Alternative 1) are reasonable.

- *Raising MT levels don't protect domestic wells.*

Current MT levels leave 18% of domestic wells dry (Alternative 1), compared to only 6% for Alternatives 2 or 3. Yes, well mitigation plans actually help domestic wells users recover losses from their wells going dry, but if we can prevent less wells from going dry, why wouldn't we want to do that?

- *Raising MT levels provide less operational flexibility.*

No. In the past 25 years, levels have fluctuated by approximately 20 feet. By providing a 40-foot buffer (Alternative 3), this provides two more "historical ranges" for plenty of operational flexibility.

- *Our aquifer always recovers, so why change MT levels?*

Yes, our aquifer recovers through droughts if our window of observation is a 20-foot range and if we're considering a 25-year history (or even longer). But current MT levels allow for

levels to reach groundwater elevations that we have NEVER seen. In fact, NEVER times 3 or 4! If levels come even close to current MT levels, I believe irreparable damage would be done to our aquifer. So, yes, our aquifer recovers if we stay within our historical range, but nobody's seen what will happen if we drop 3-4 times the historical range.

I hope the Board will consider and choose Alternative 3 for RCA 3 and protect our aquifer in the challenging times ahead.

Thanks for reading,

Todd Greene

--

Todd J. Greene

Professor

Department of Earth and Environmental Sciences

California State University, Chico

400 W. 1st St.

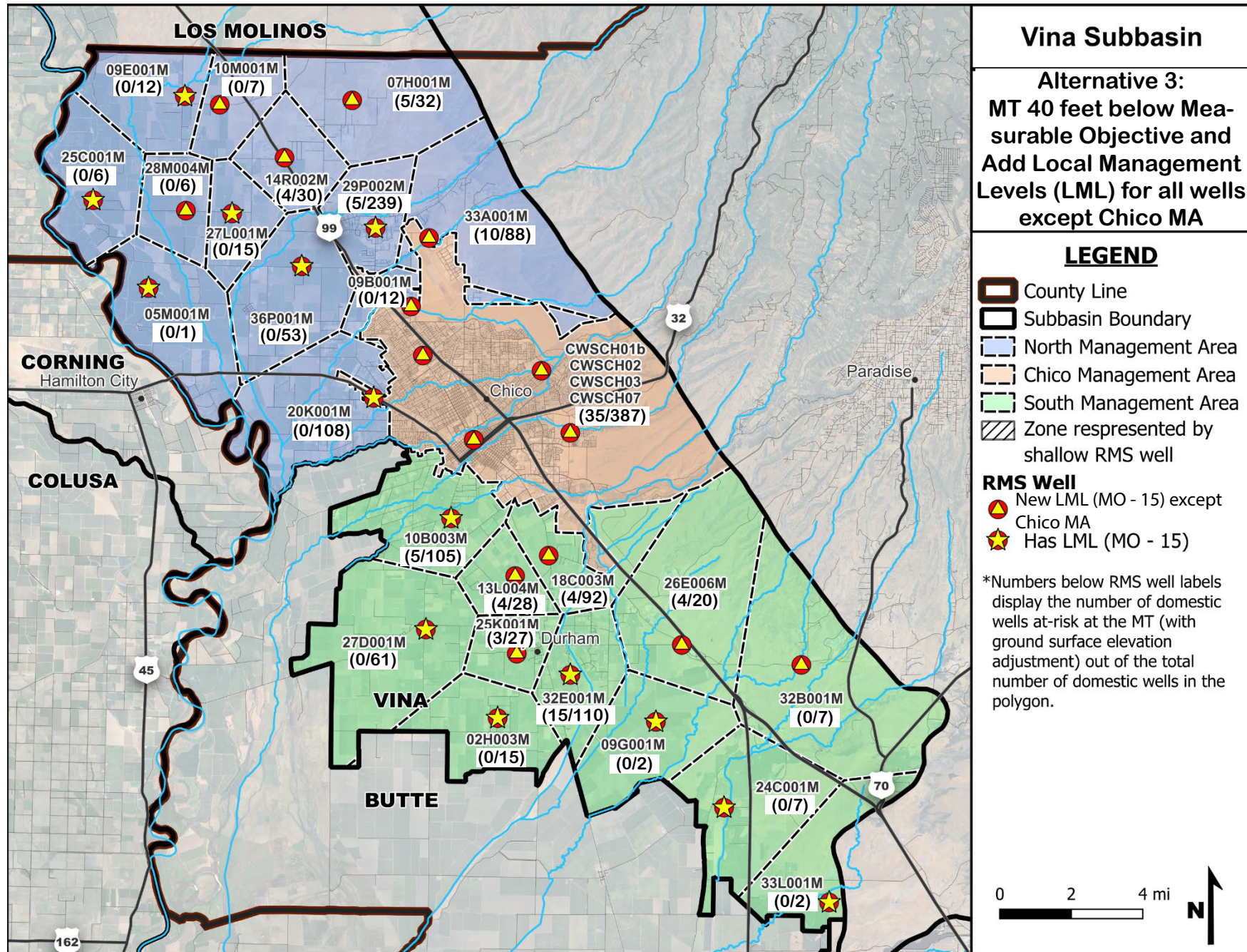
Chico, CA 95929-0205

office: (530) 898-4300

<http://toddgreene.weebly.com>

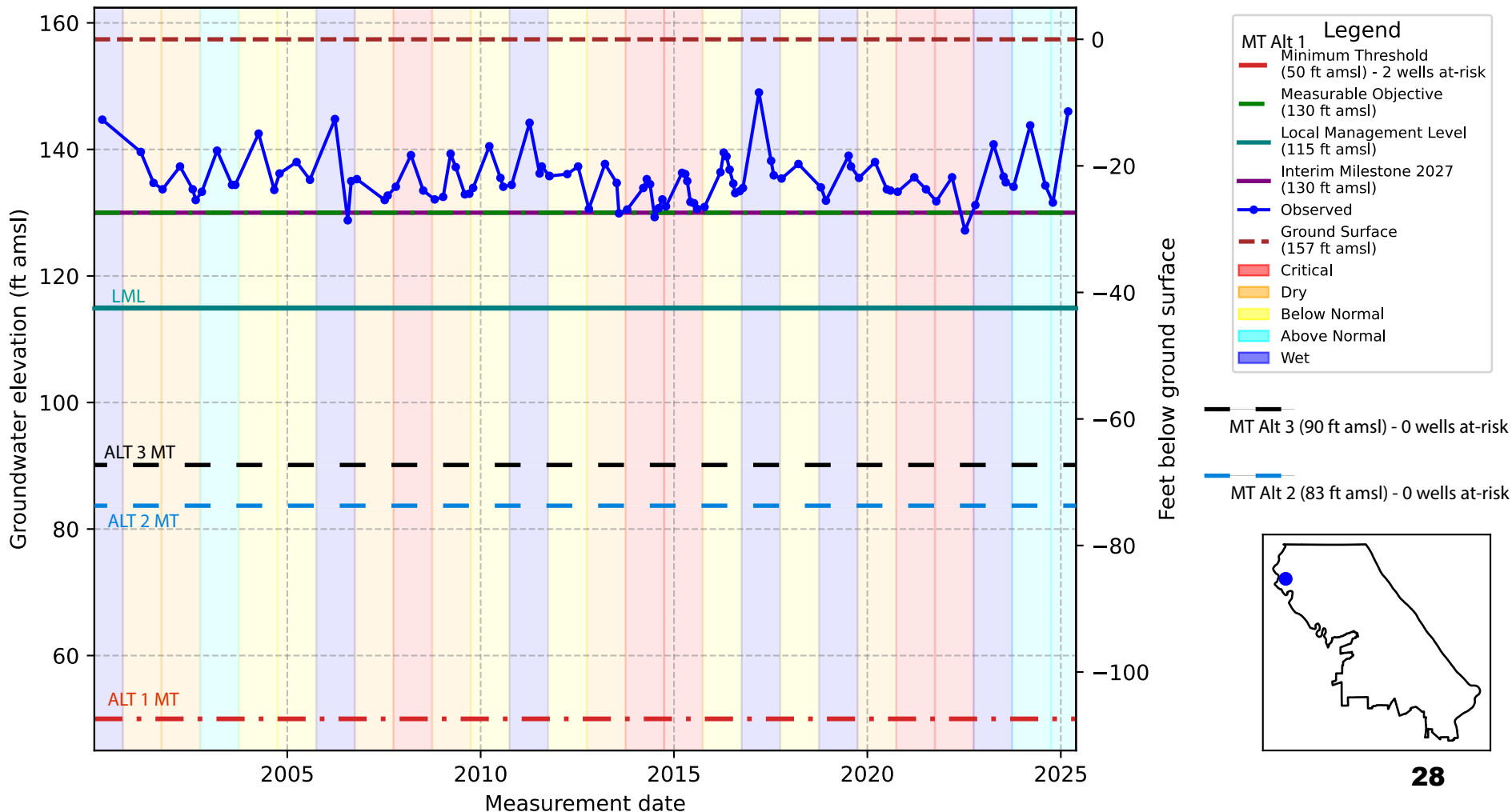
tjgreene@csuchico.edu

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



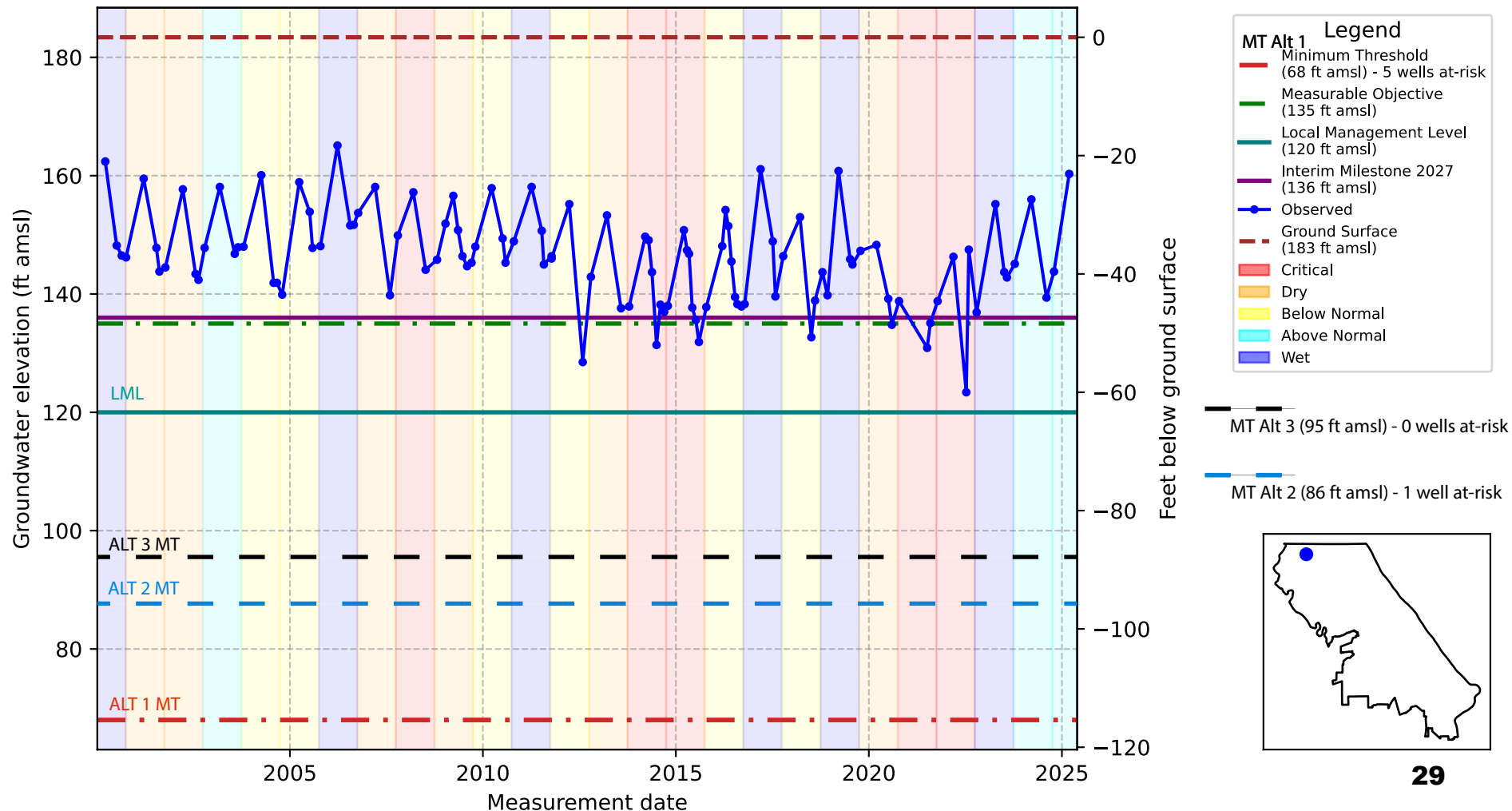
Vina Subbasin - State Well Number (SWN): 23N02W25C001M

Total Number of Domestic Wells = 6



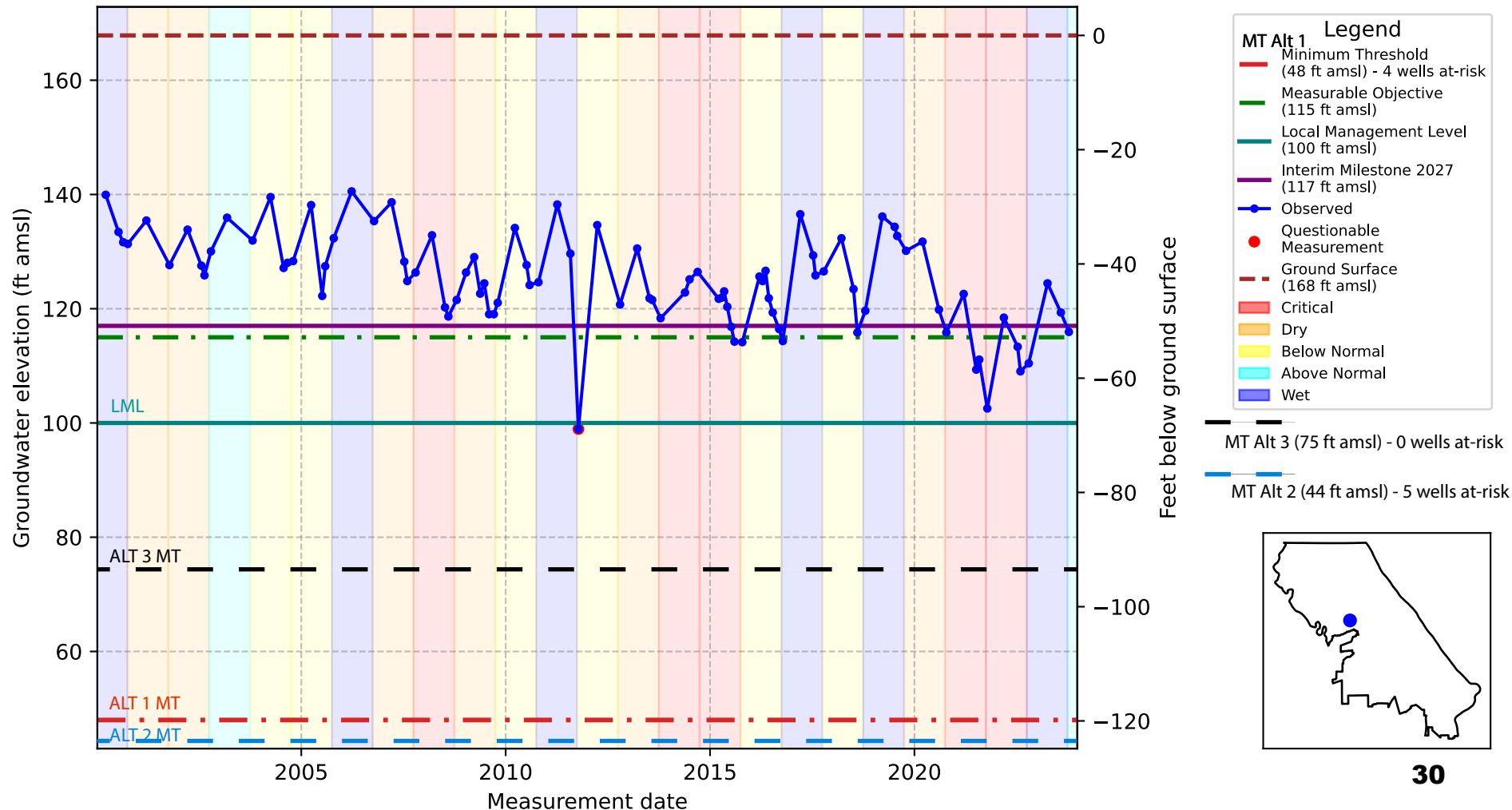
Vina Subbasin - State Well Number (SWN): 23N01W09E001M

Total Number of Domestic Wells = 12



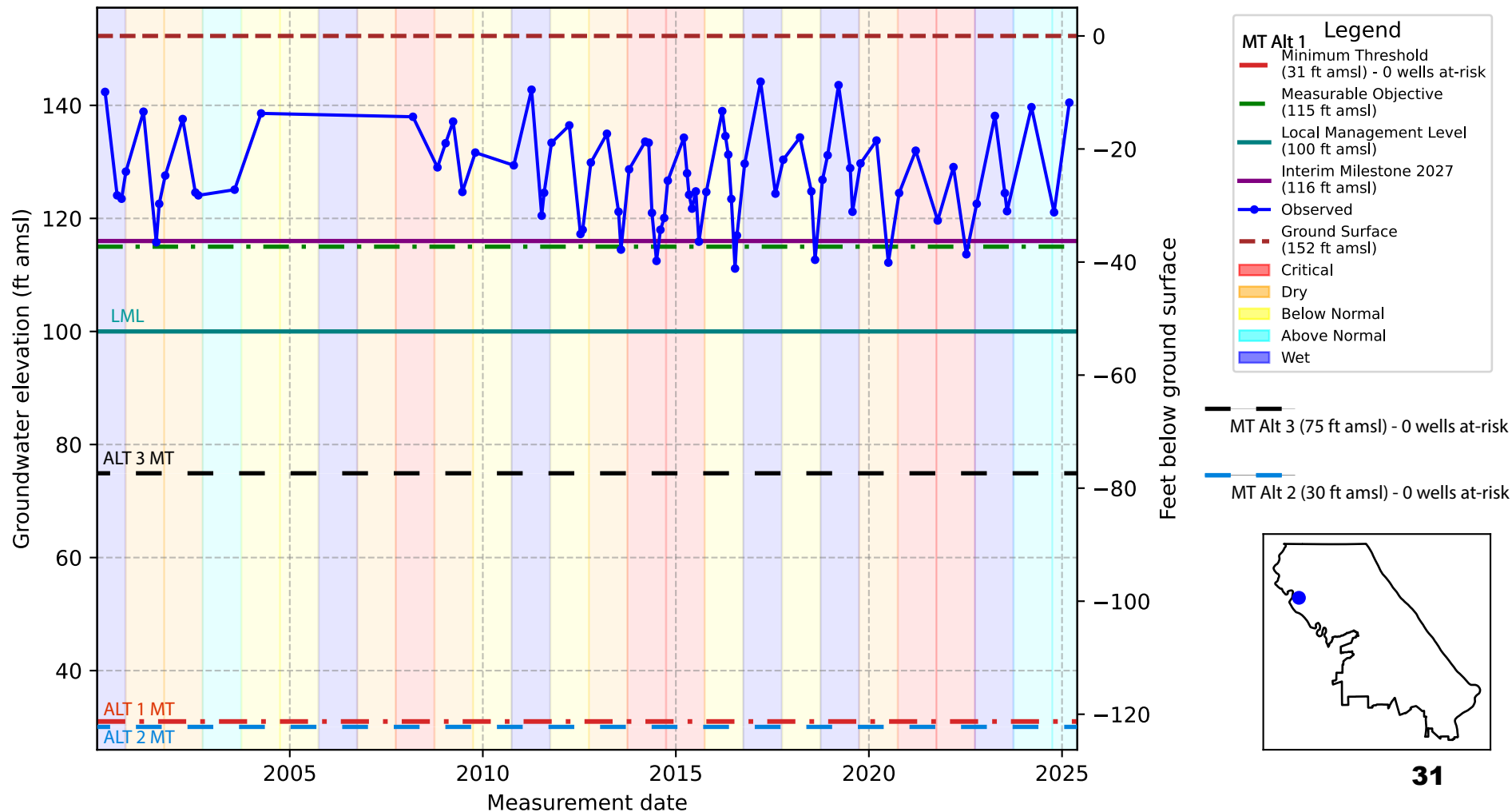
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Total Number of Domestic Wells = 108



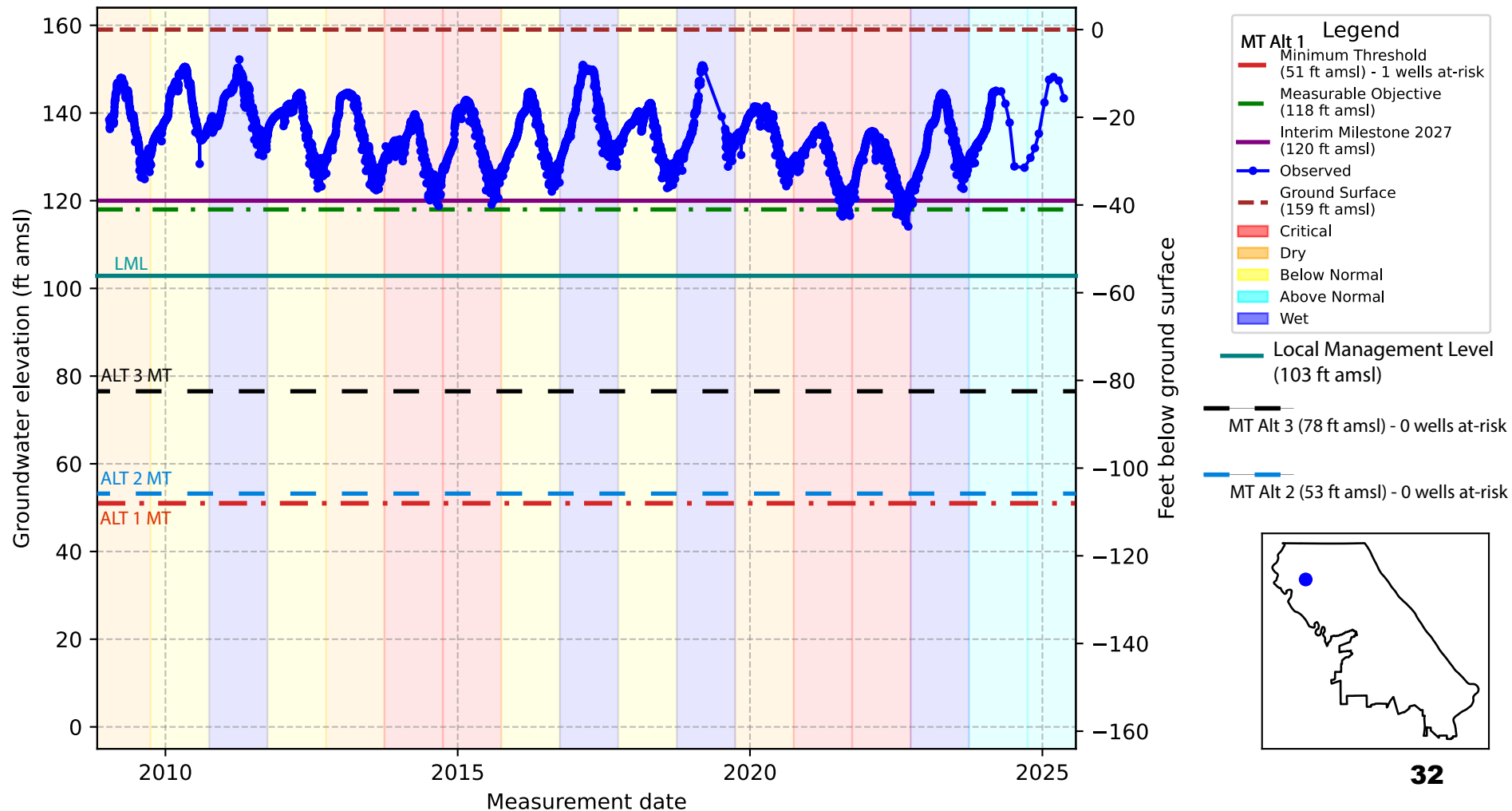
Vina Subbasin - State Well Number (SWN): 22N01W05M001M

Total Number of Domestic Wells = 1



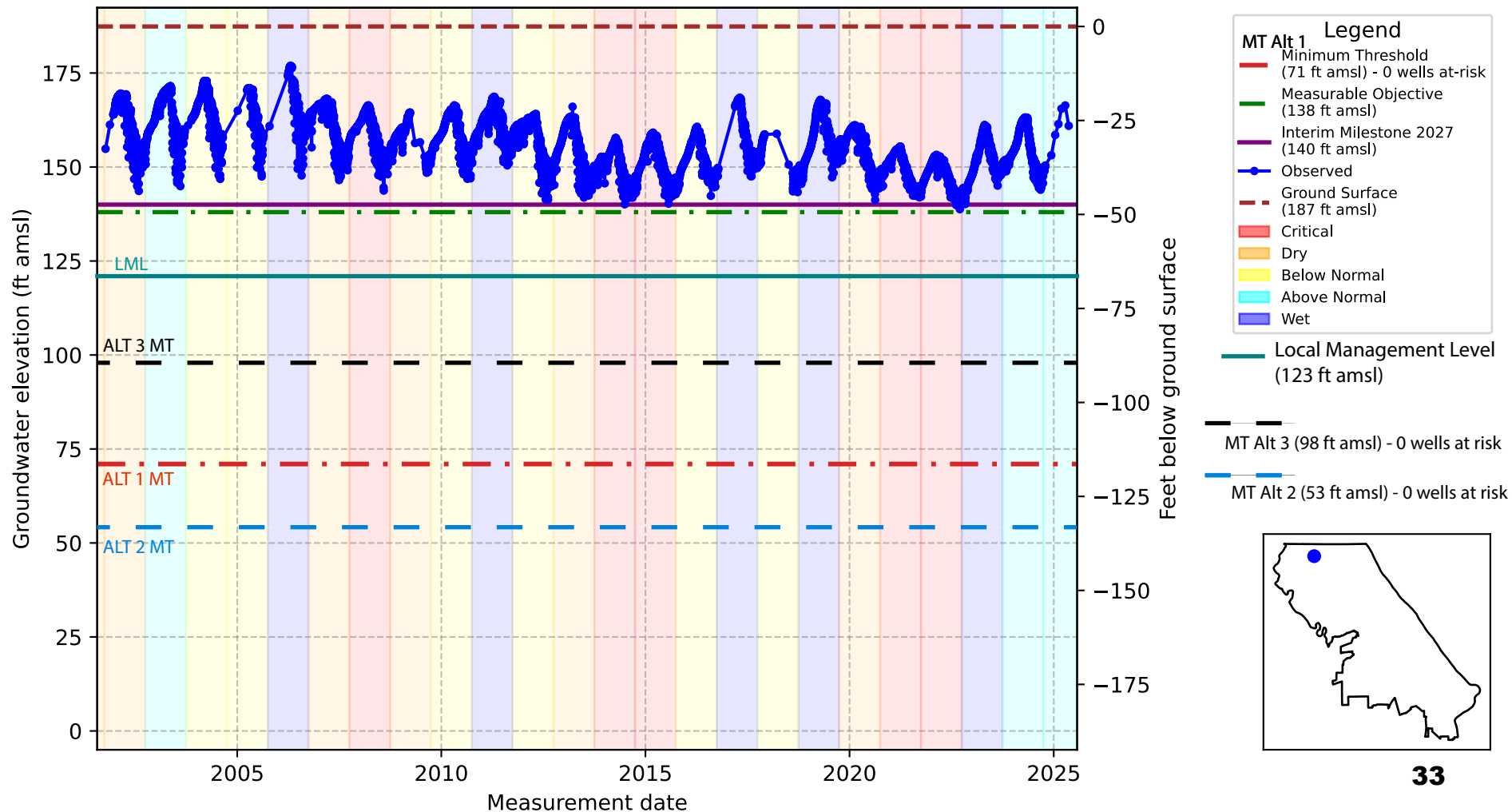
Vina Subbasin - State Well Number (SWN): 23N01W28M004M

Total Number of Domestic Wells = 6



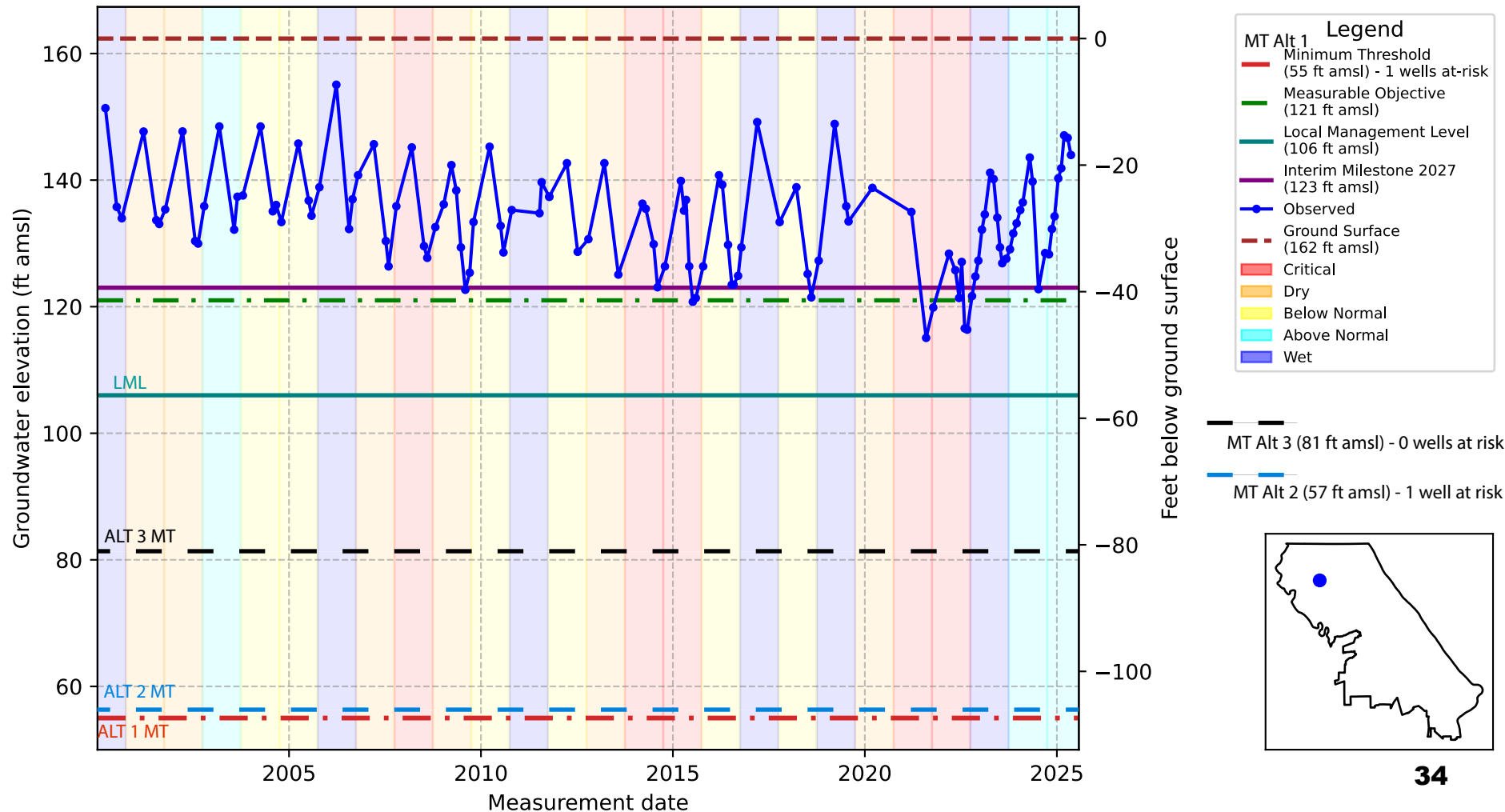
Vina Subbasin - State Well Number (SWN): 23N01W10M001M

Total Number of Domestic Wells = 7



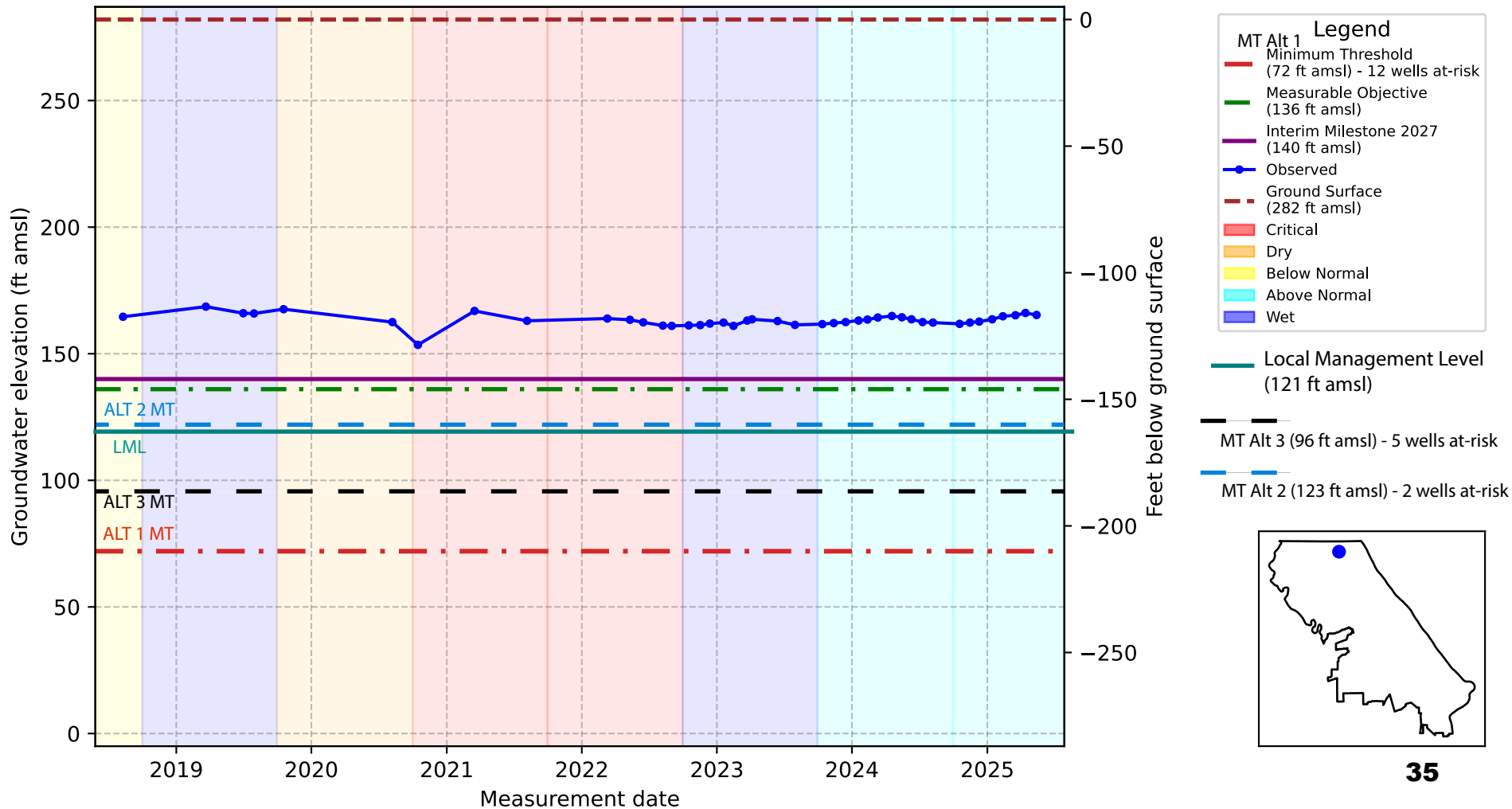
Vina Subbasin - State Well Number (SWN): 23N01W27L001M

Total Number of Domestic Wells = 15



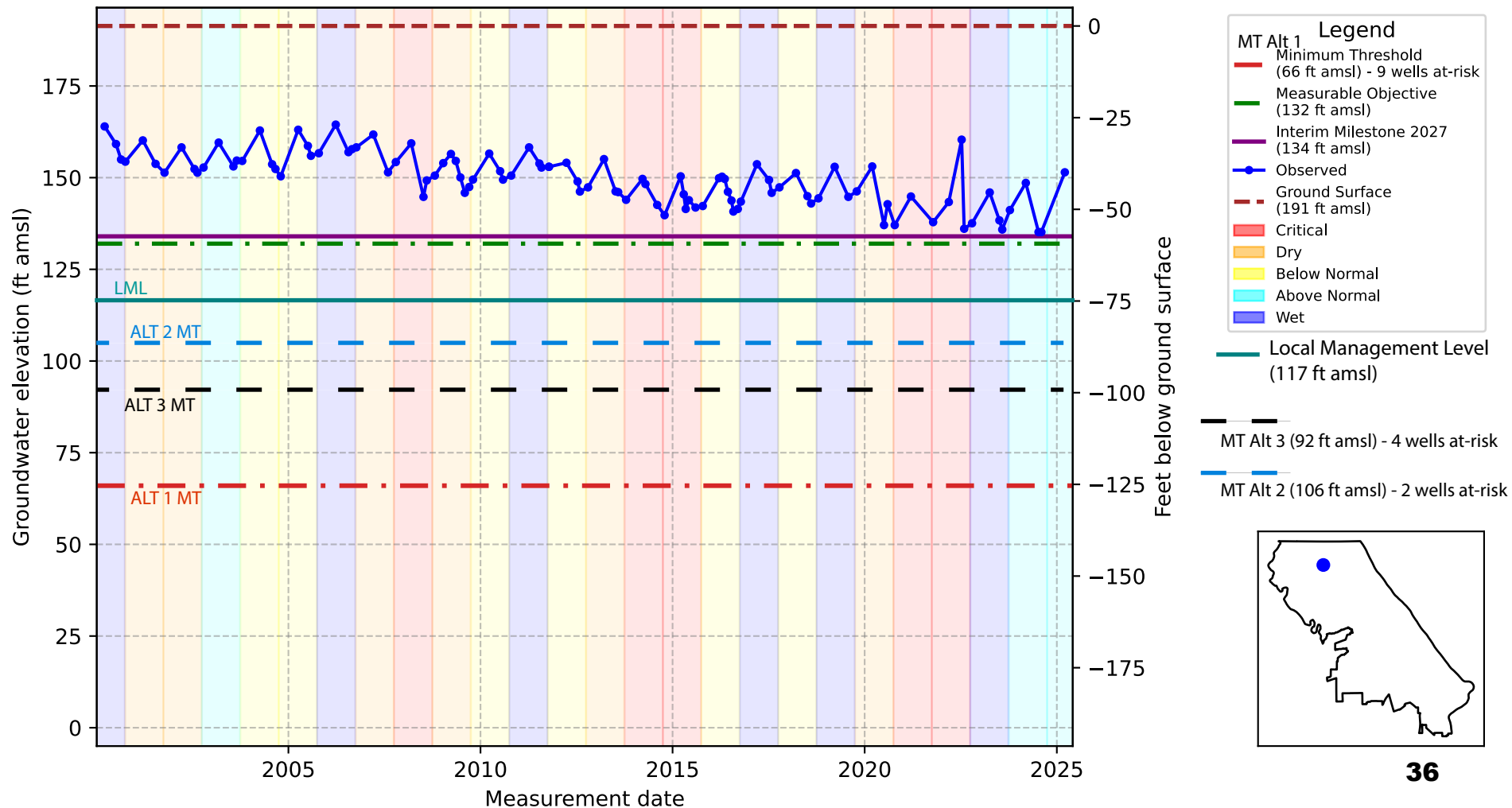
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Total Number of Domestic Wells = 32



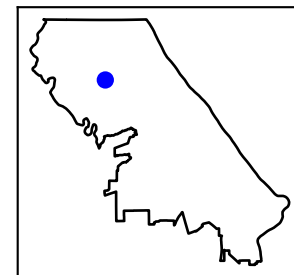
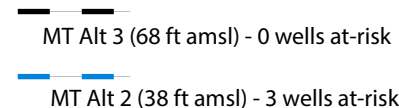
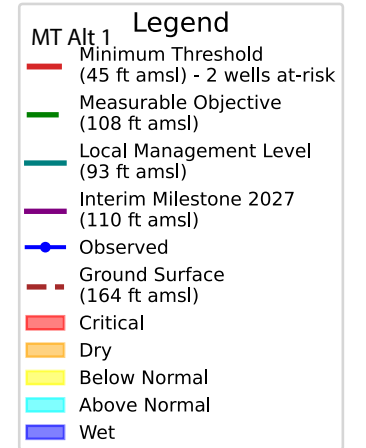
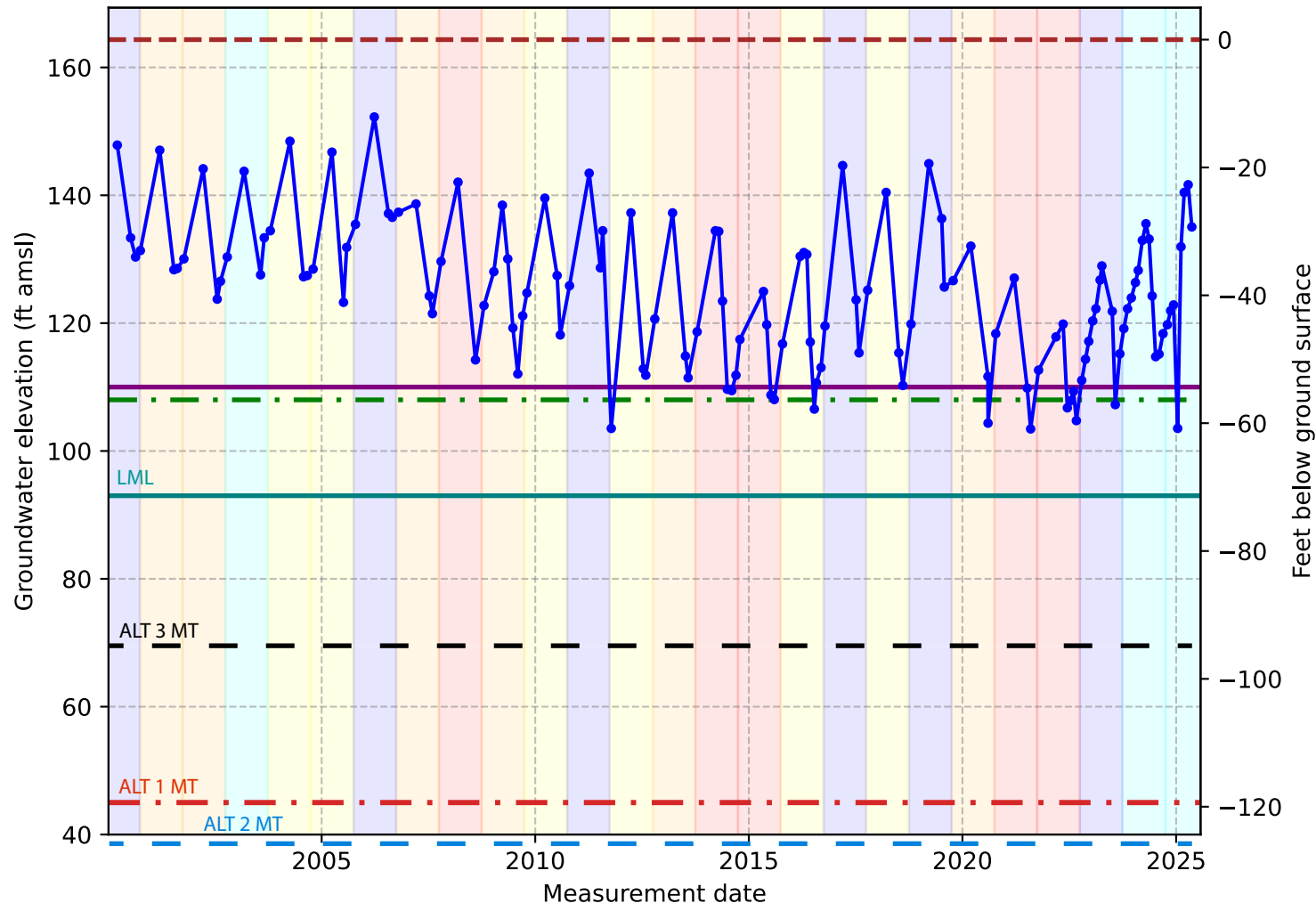
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Total Number of Domestic Wells = 30



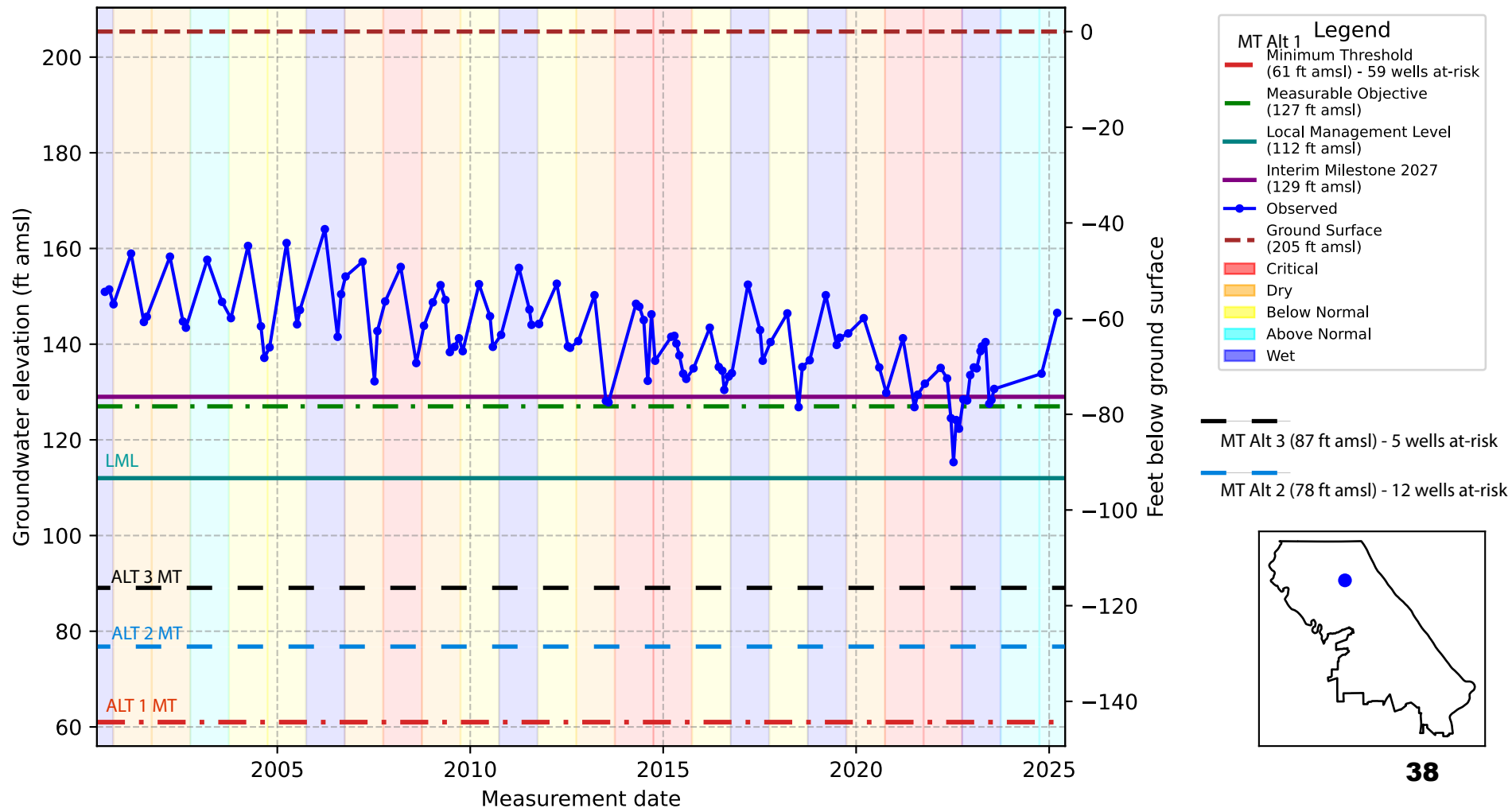
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Total Number of Domestic Wells = 53



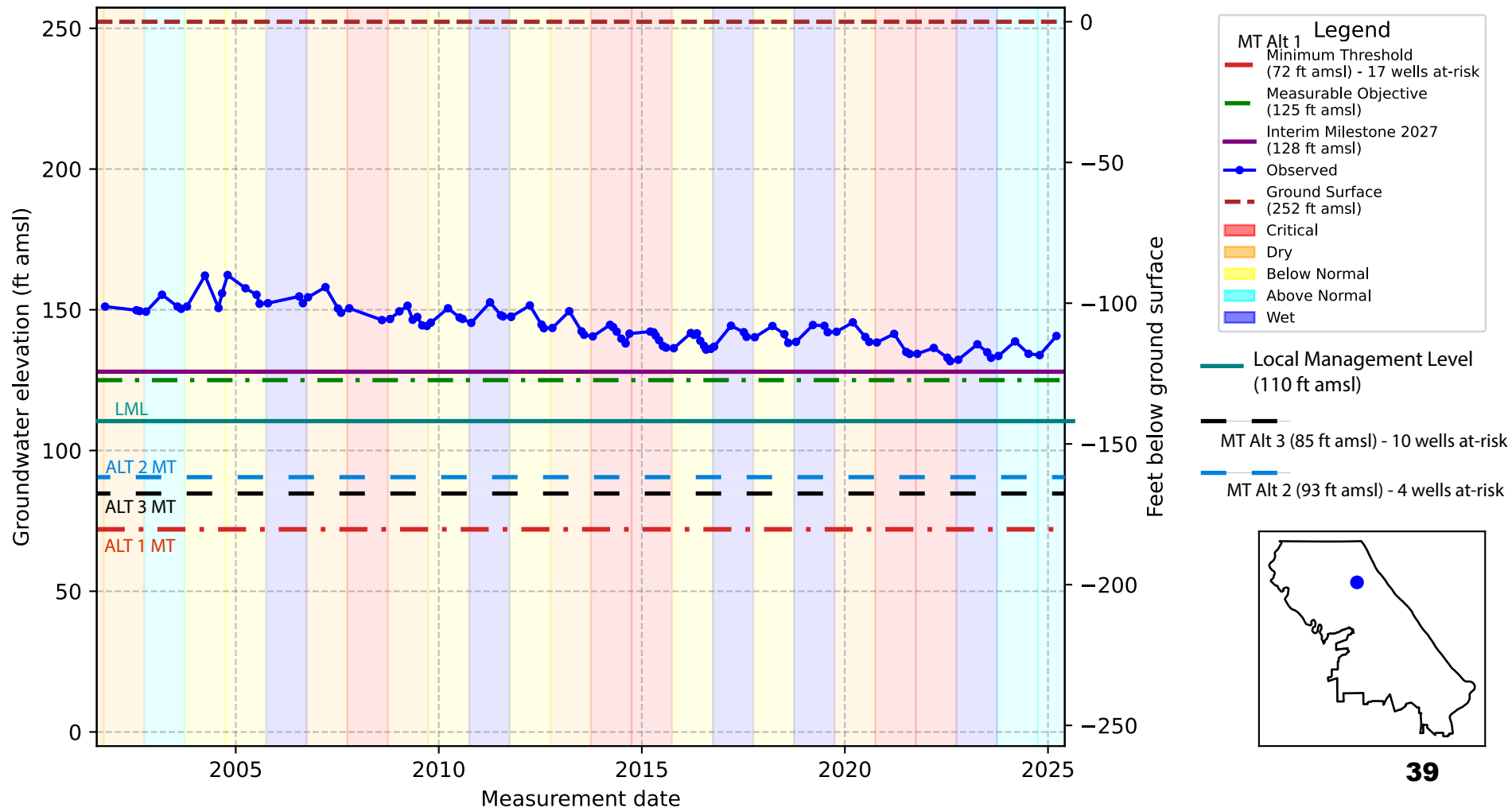
Vina Subbasin - State Well Number (SWN): 23N01E29P002M

Total Number of Domestic Wells = 239



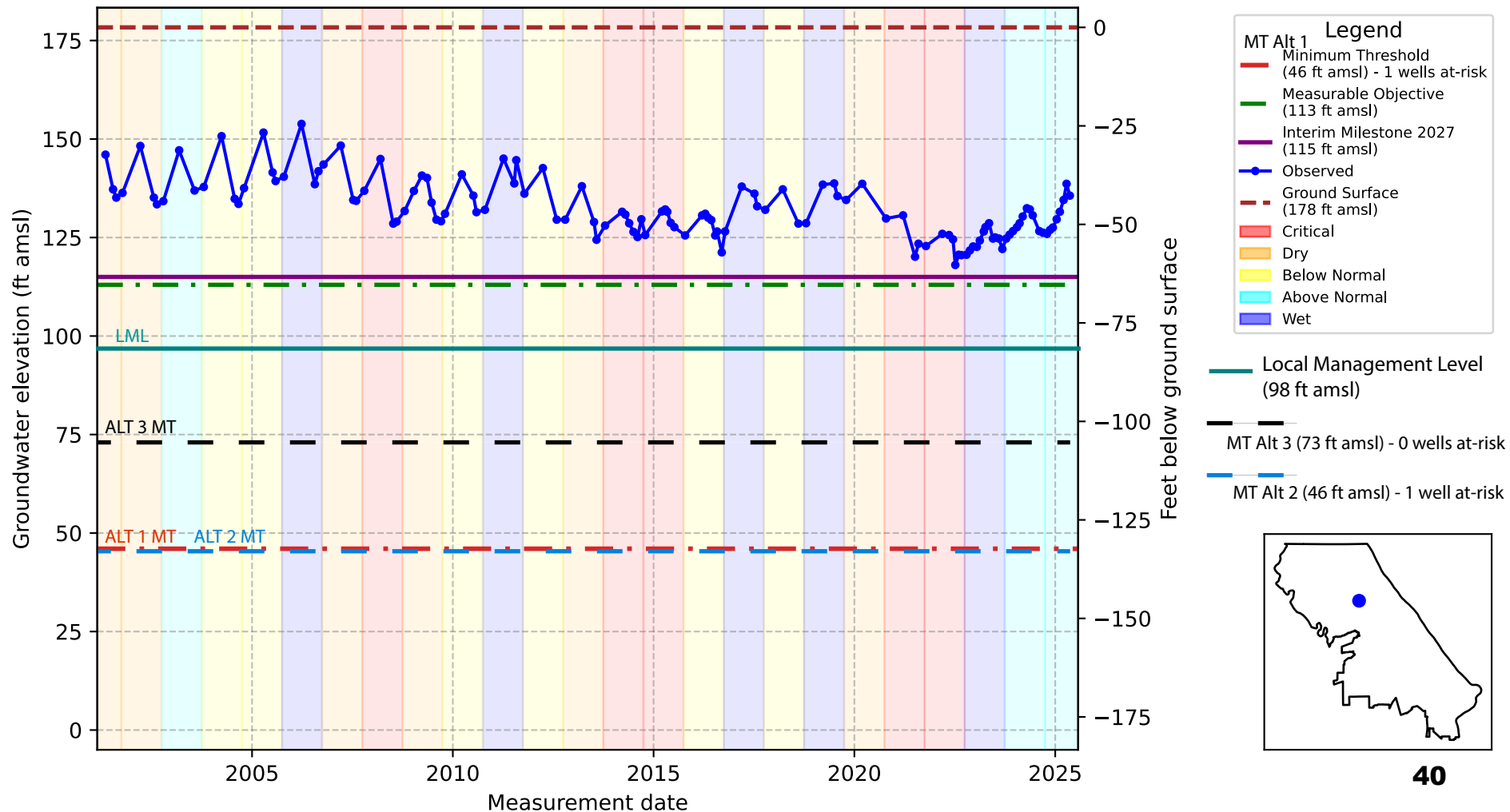
Vina Subbasin - State Well Number (SWN): 23N01E33A001M

Total Number of Domestic Wells = 88



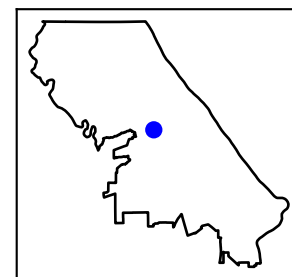
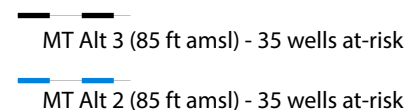
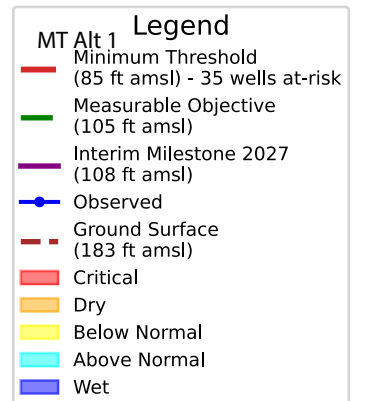
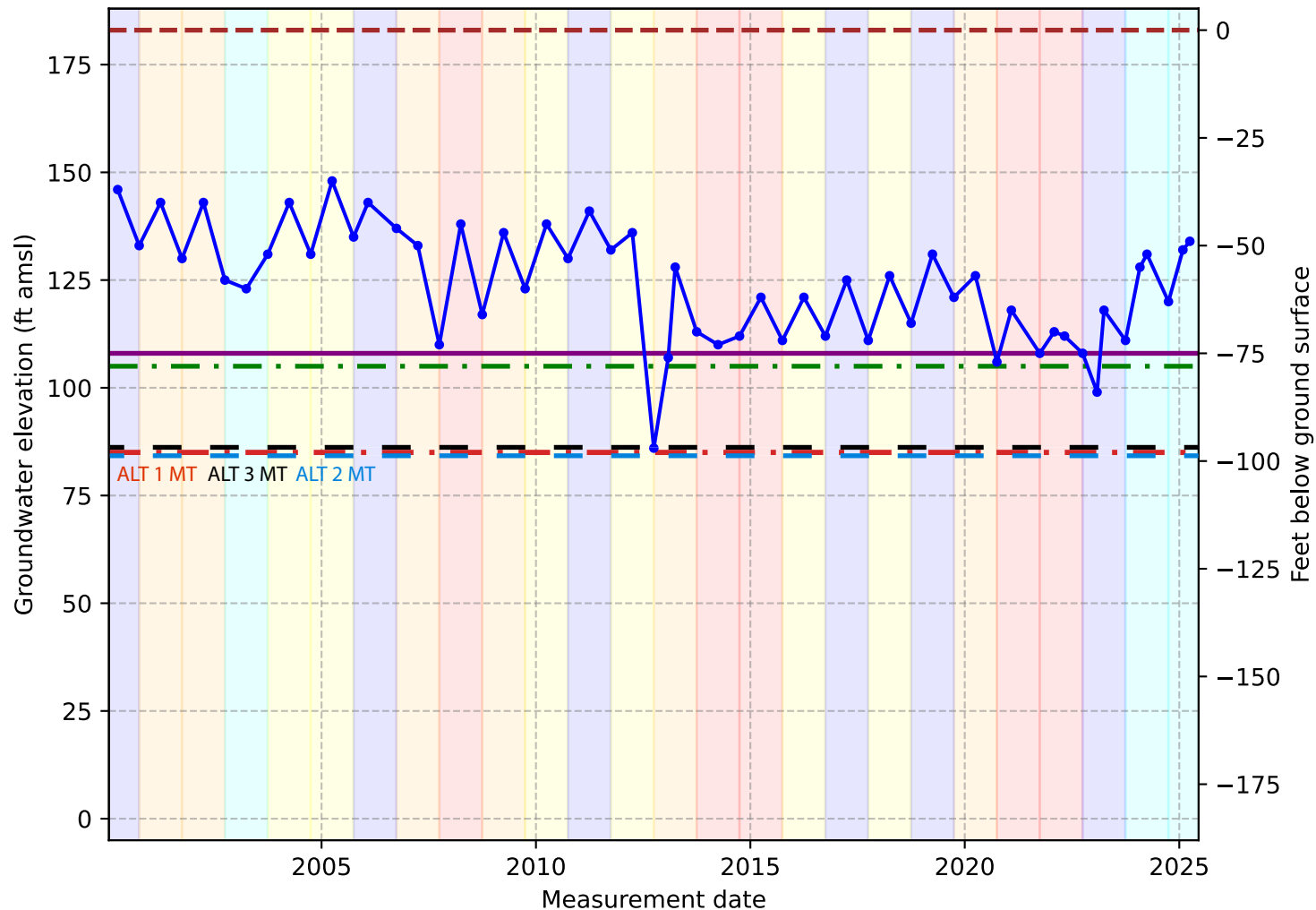
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Total Number of Domestic Wells = 12



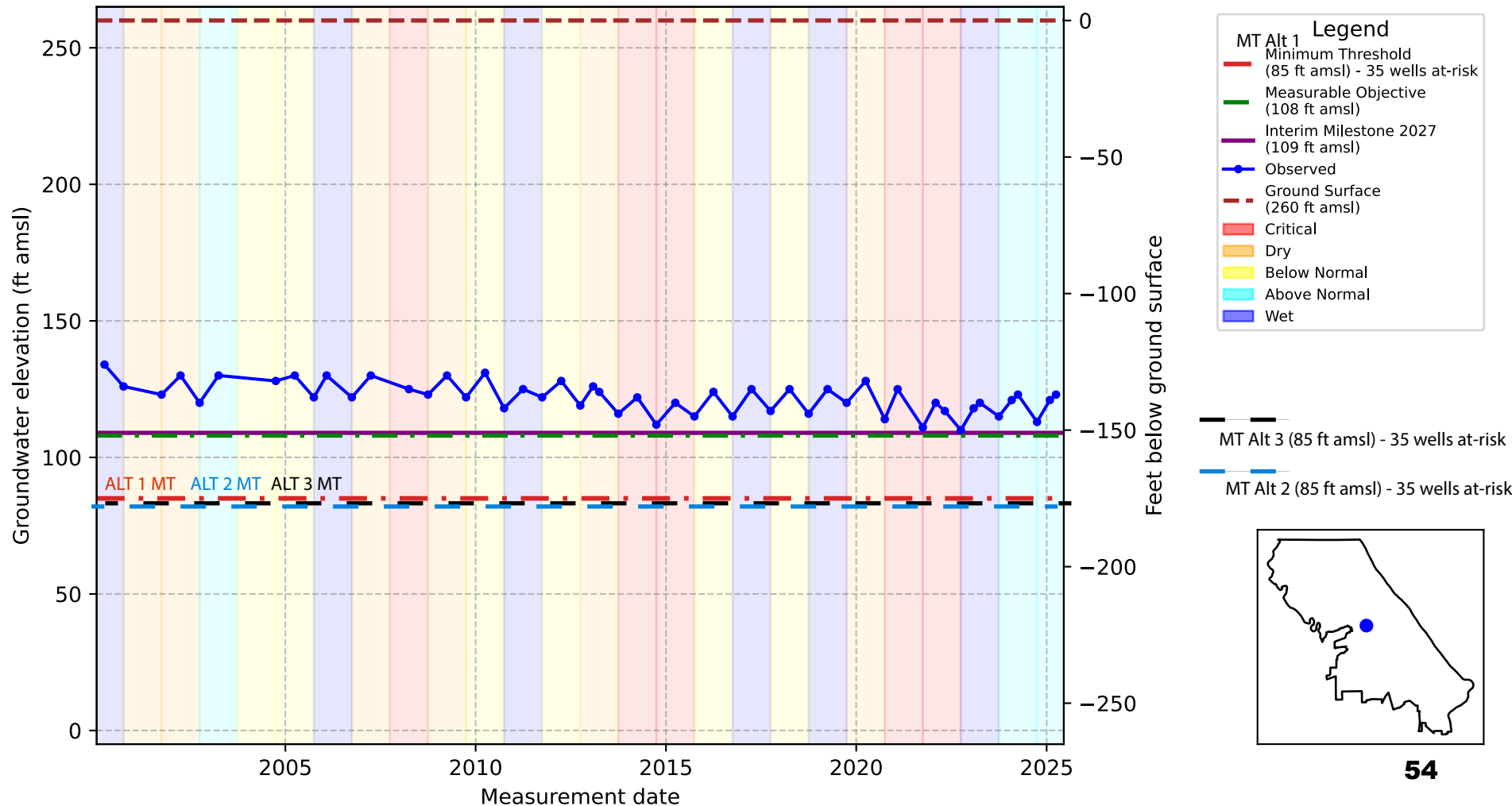
Vina Subbasin - State Well Number (SWN): CWSCH02

Total Number of Domestic Wells = 387



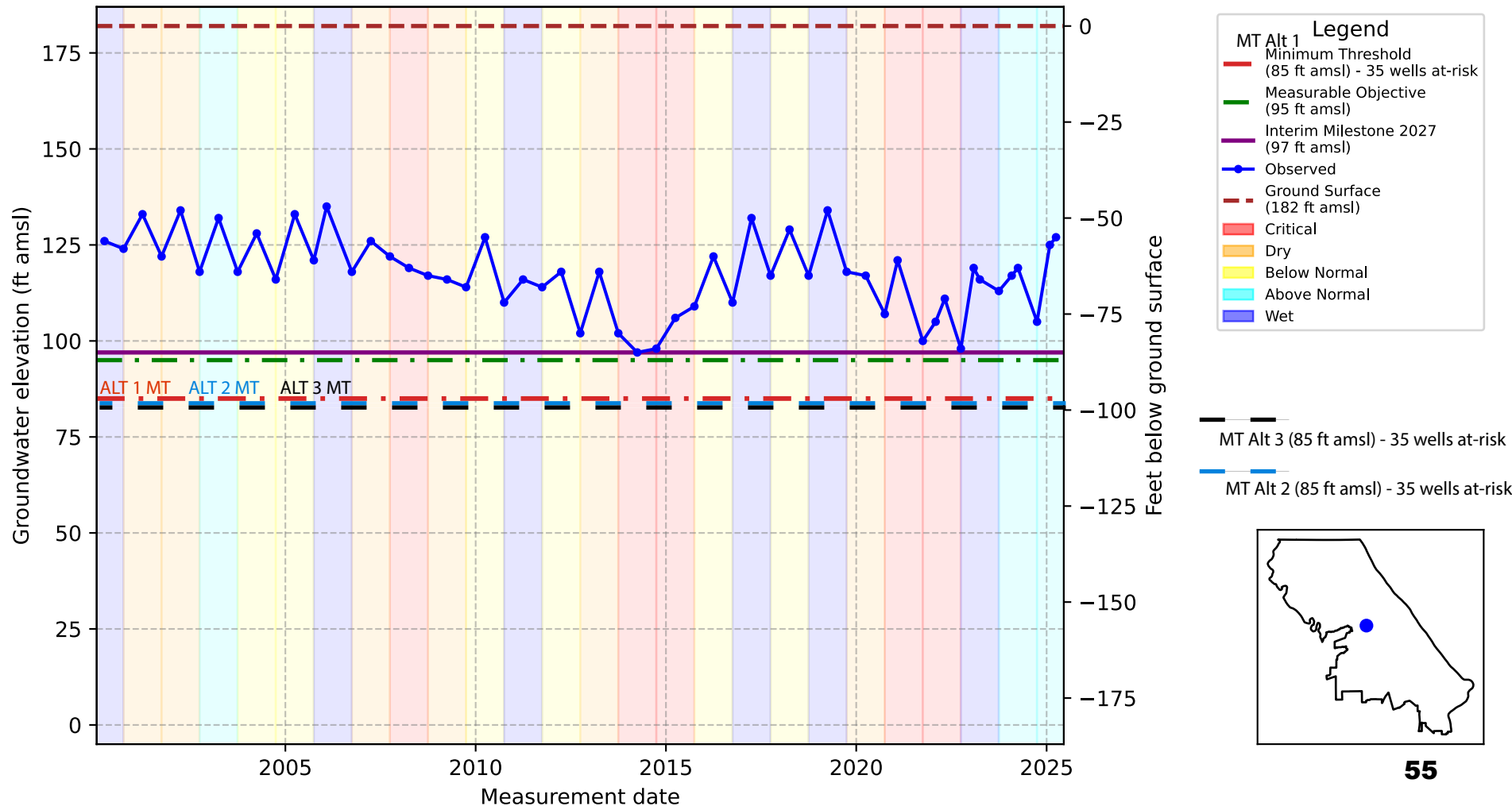
Vina Subbasin - State Well Number (SWN): CWSCH03

Total Number of Domestic Wells = 387



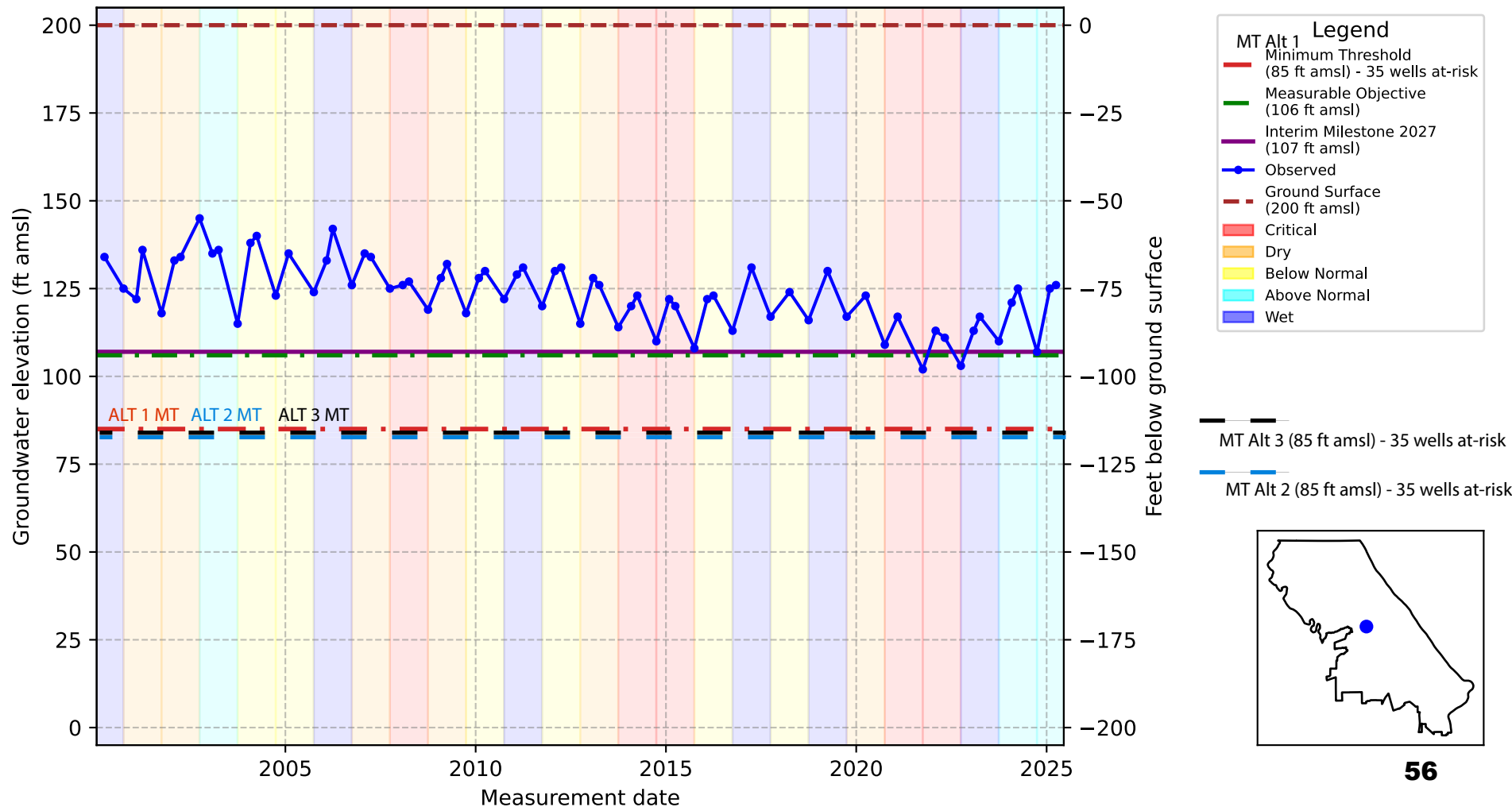
Vina Subbasin - State Well Number (SWN): CWSCH07

Total Number of Domestic Wells = 387

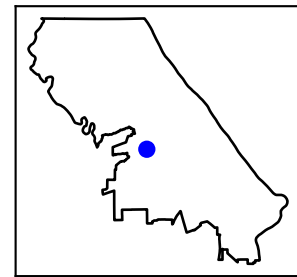


Vina Subbasin - State Well Number (SWN): CWSCH01b

Total Number of Domestic Wells = 387

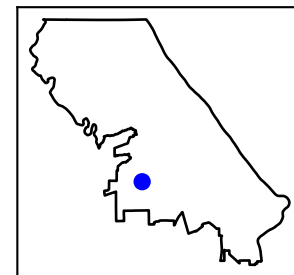
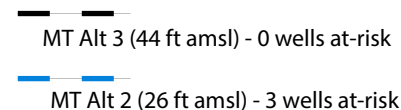
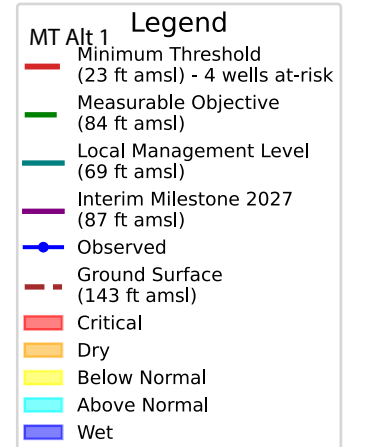
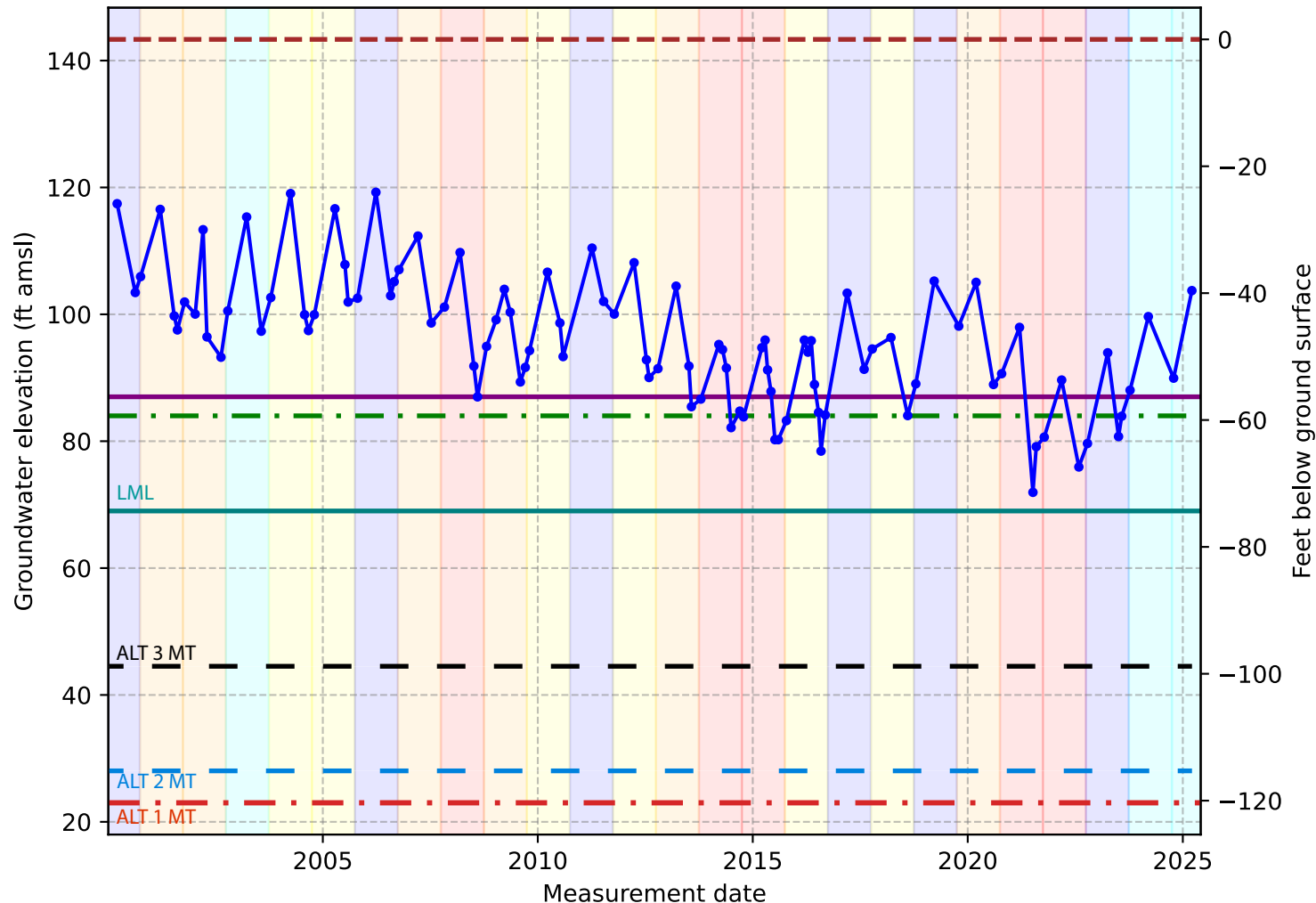


Total Number of Domestic Wells = 105



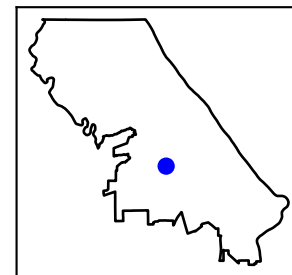
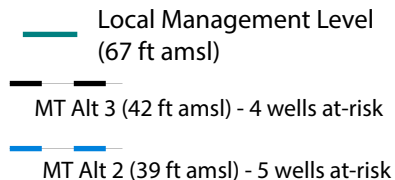
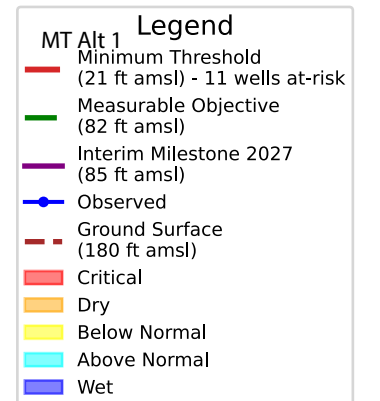
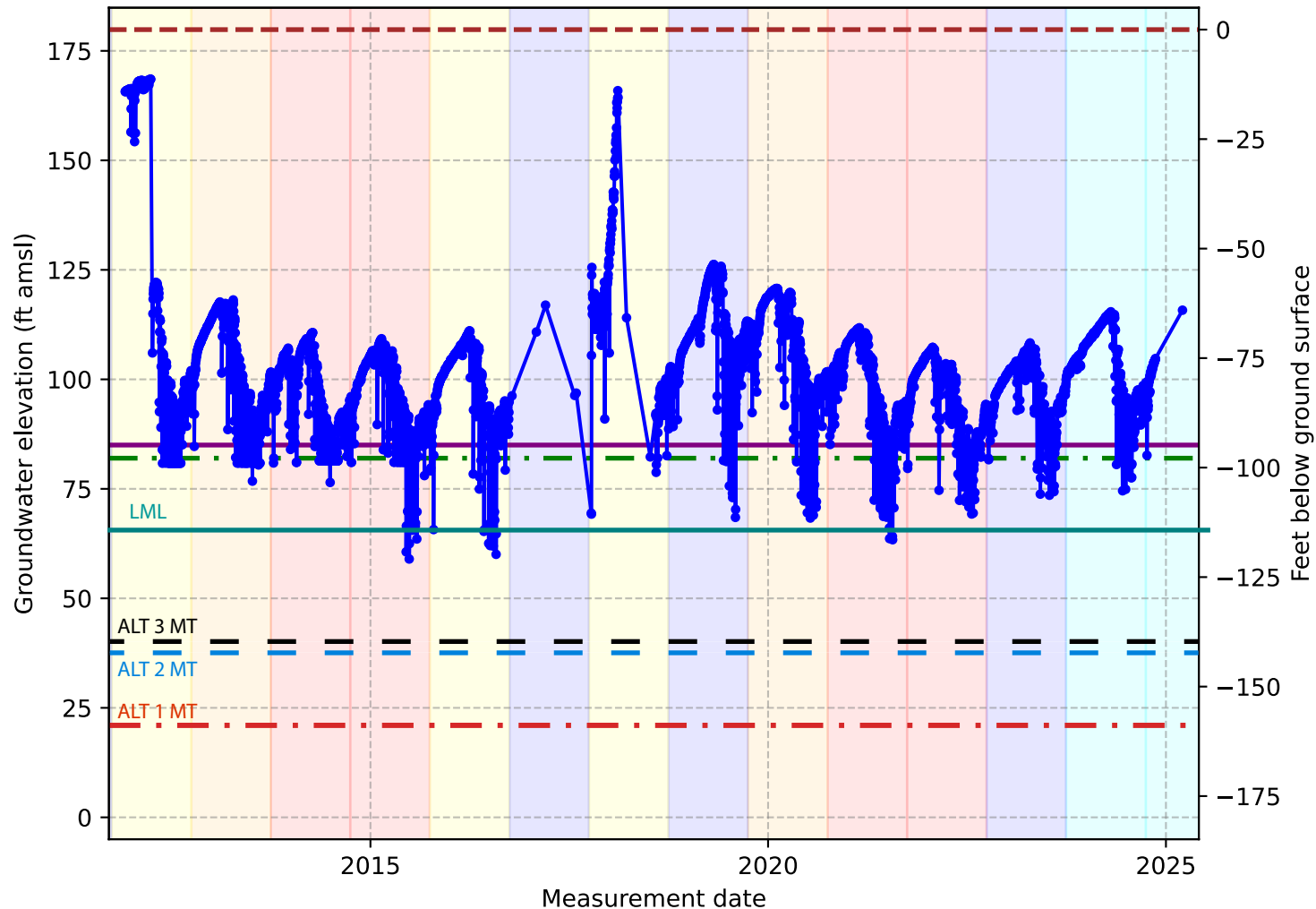
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Total Number of Domestic Wells = 61



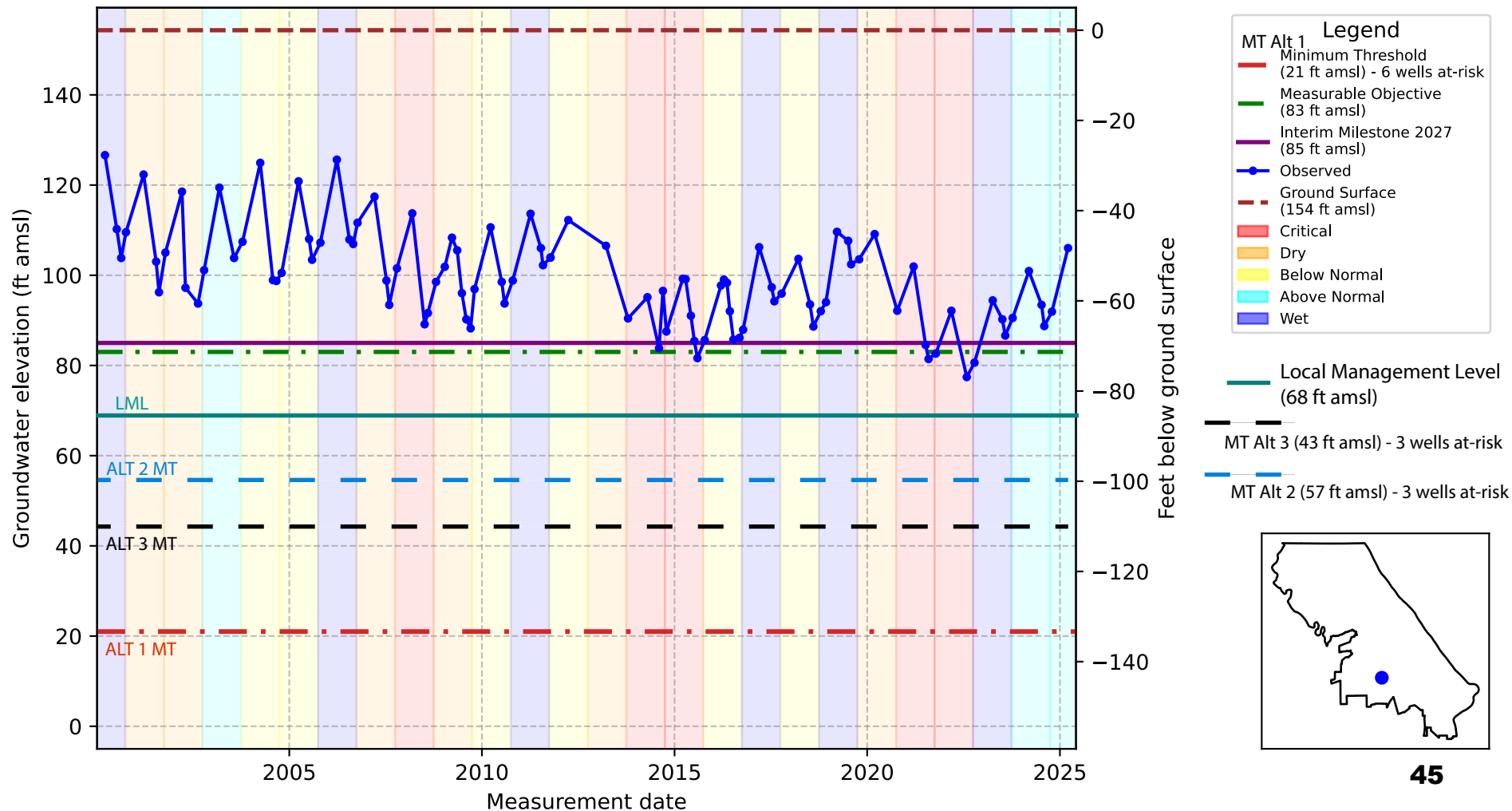
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Total Number of Domestic Wells = 28



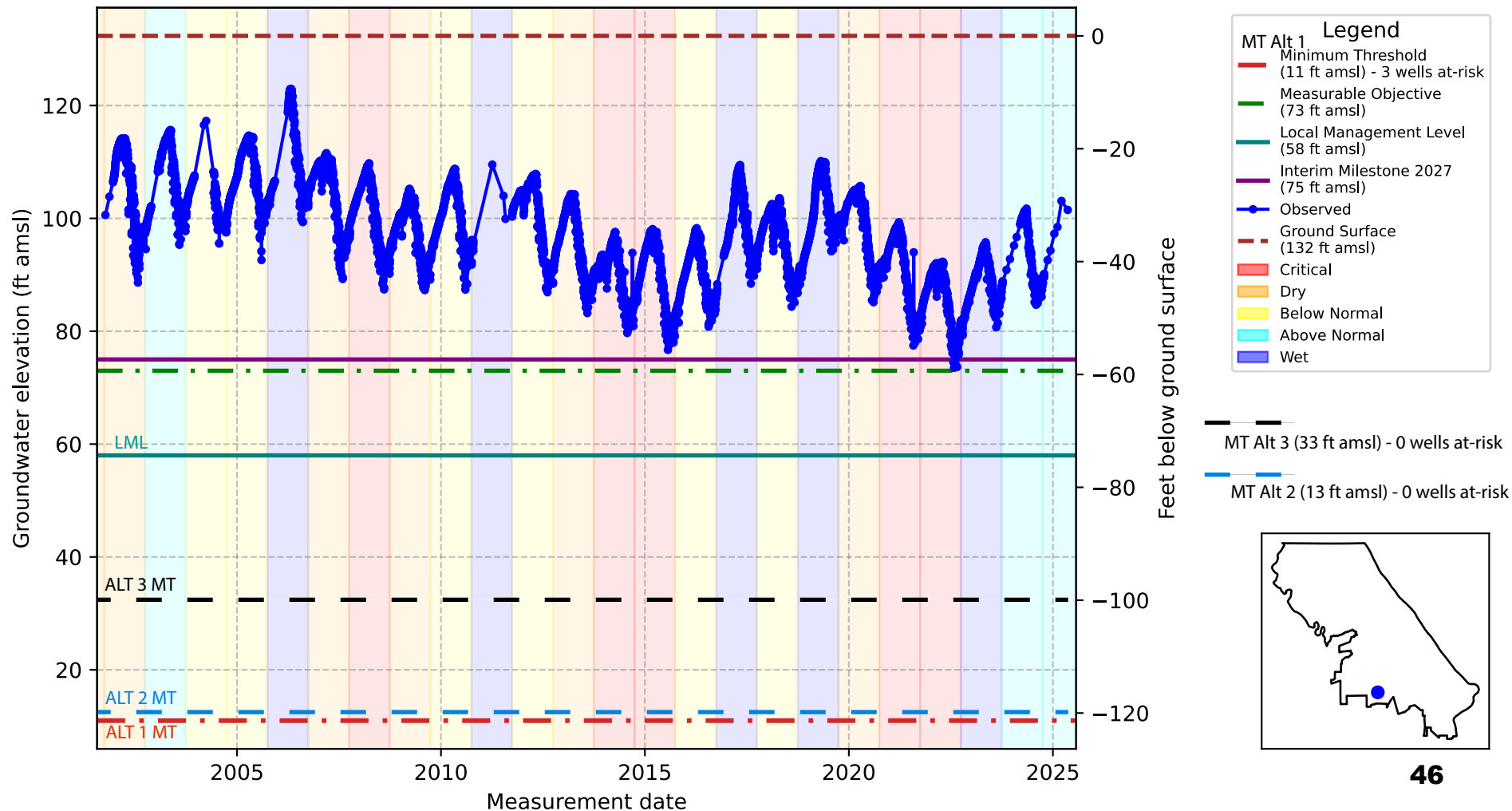
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Total Number of Domestic Wells = 27



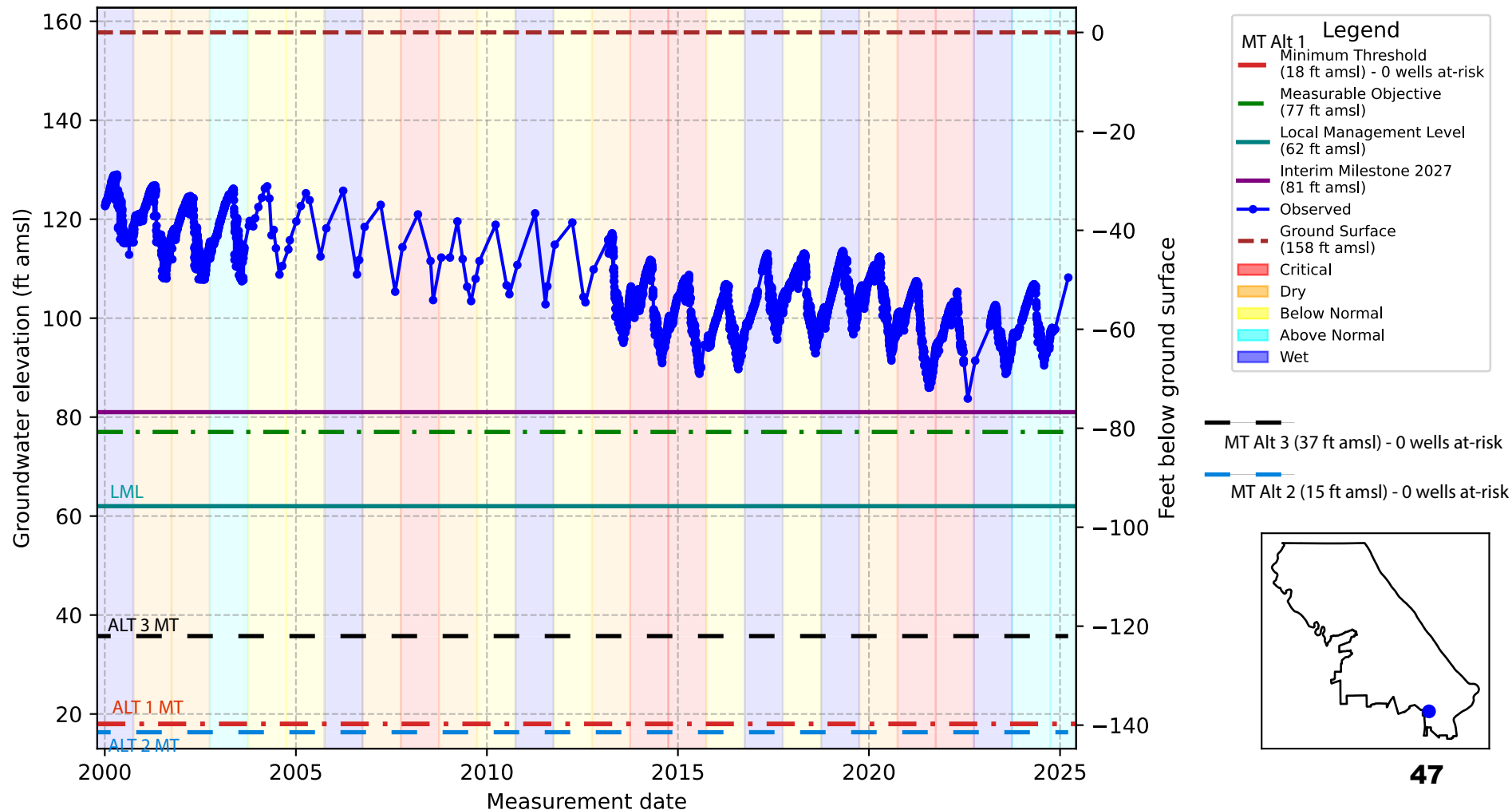
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Total Number of Domestic Wells = 15



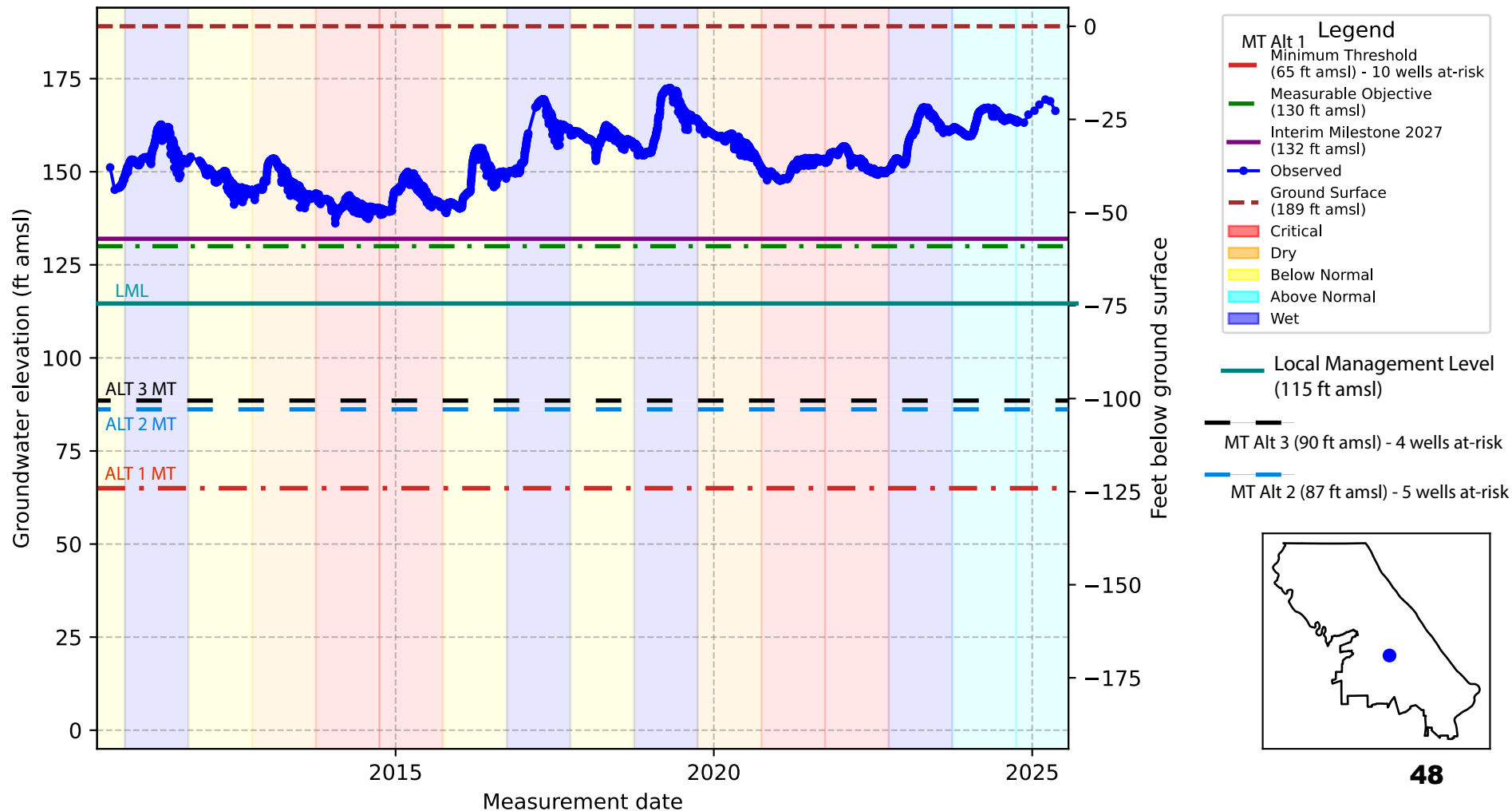
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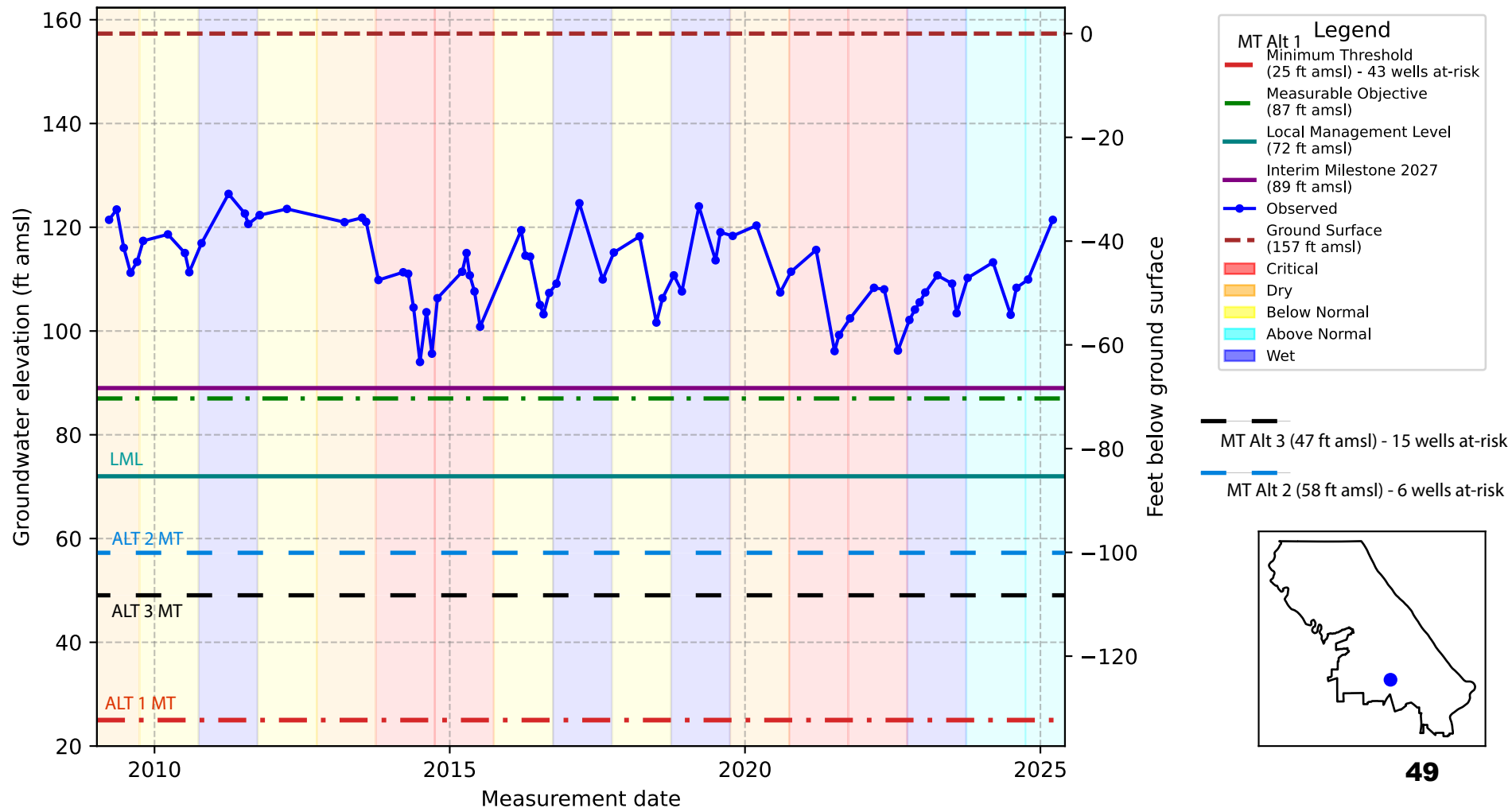
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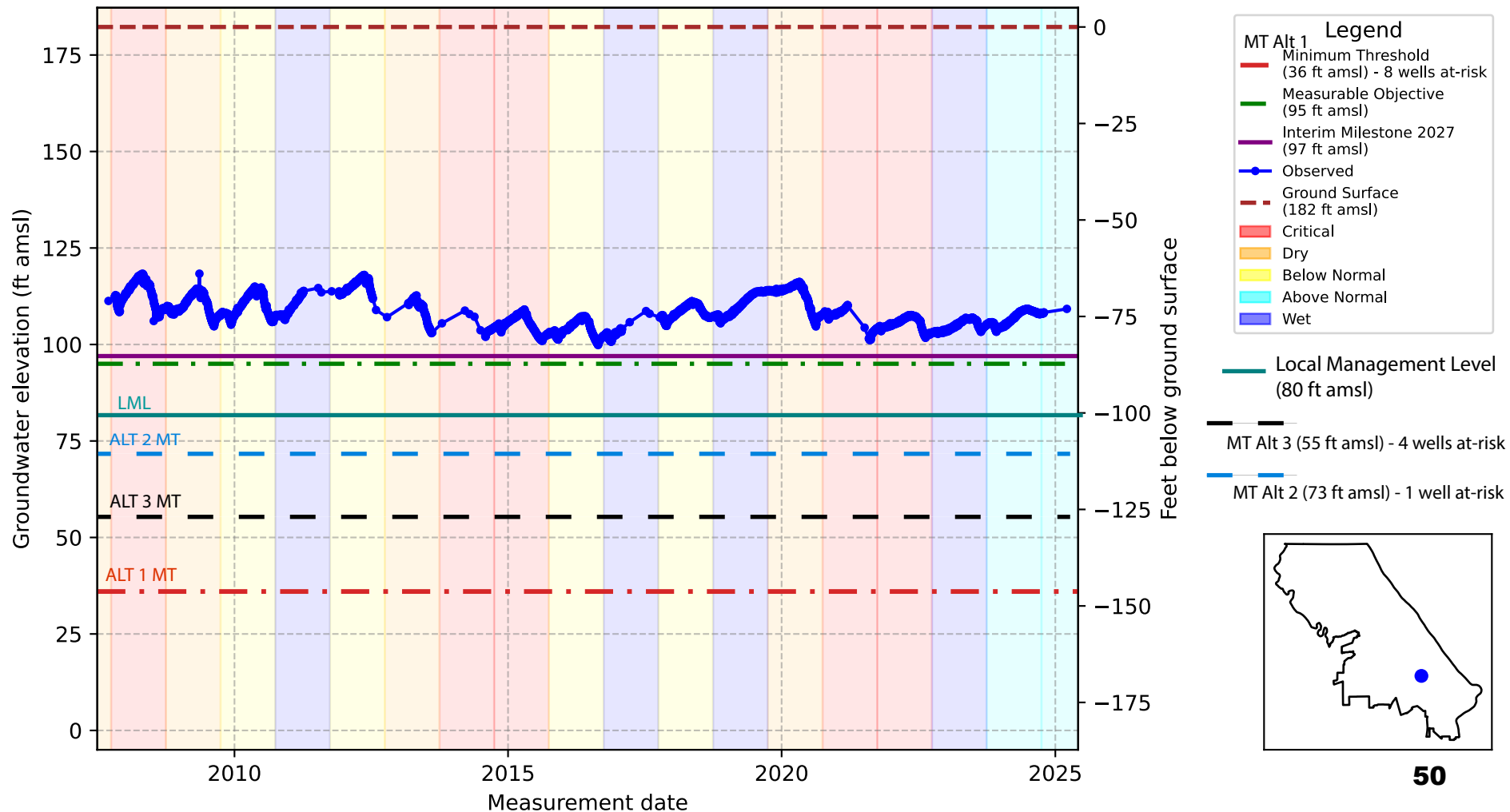
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Total Number of Domestic Wells = 110



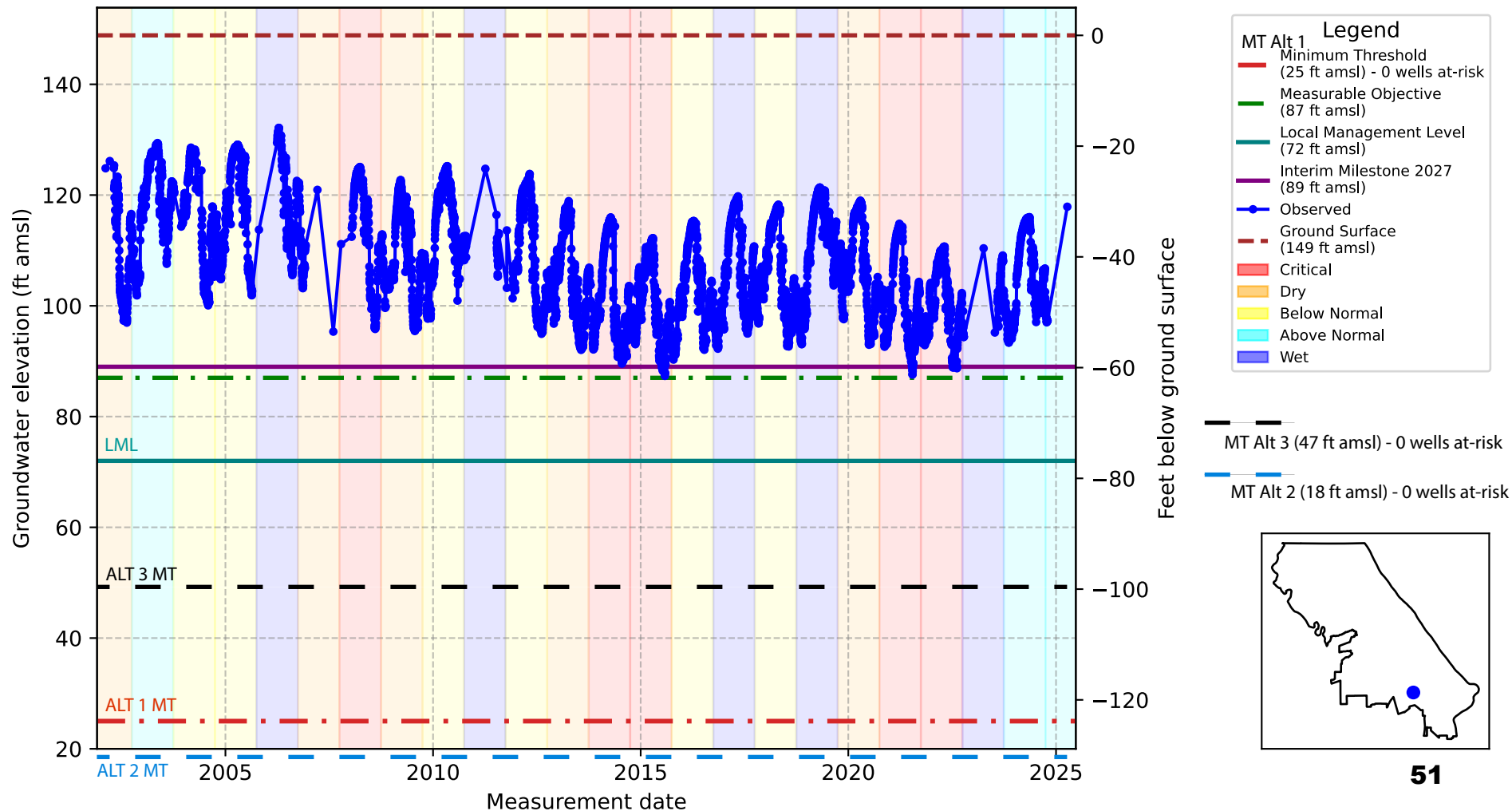
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Total Number of Domestic Wells = 20



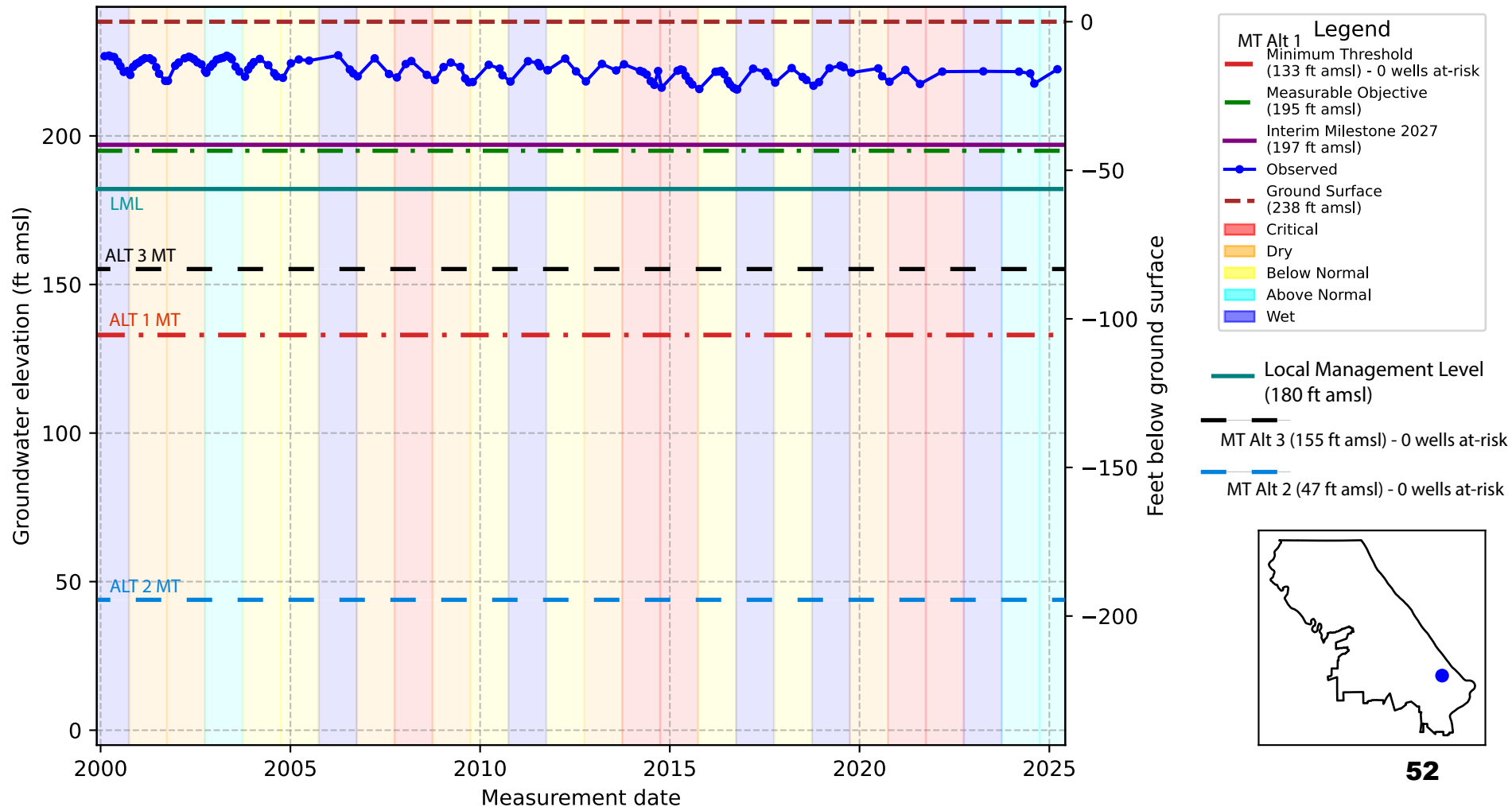
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Total Number of Domestic Wells = 2



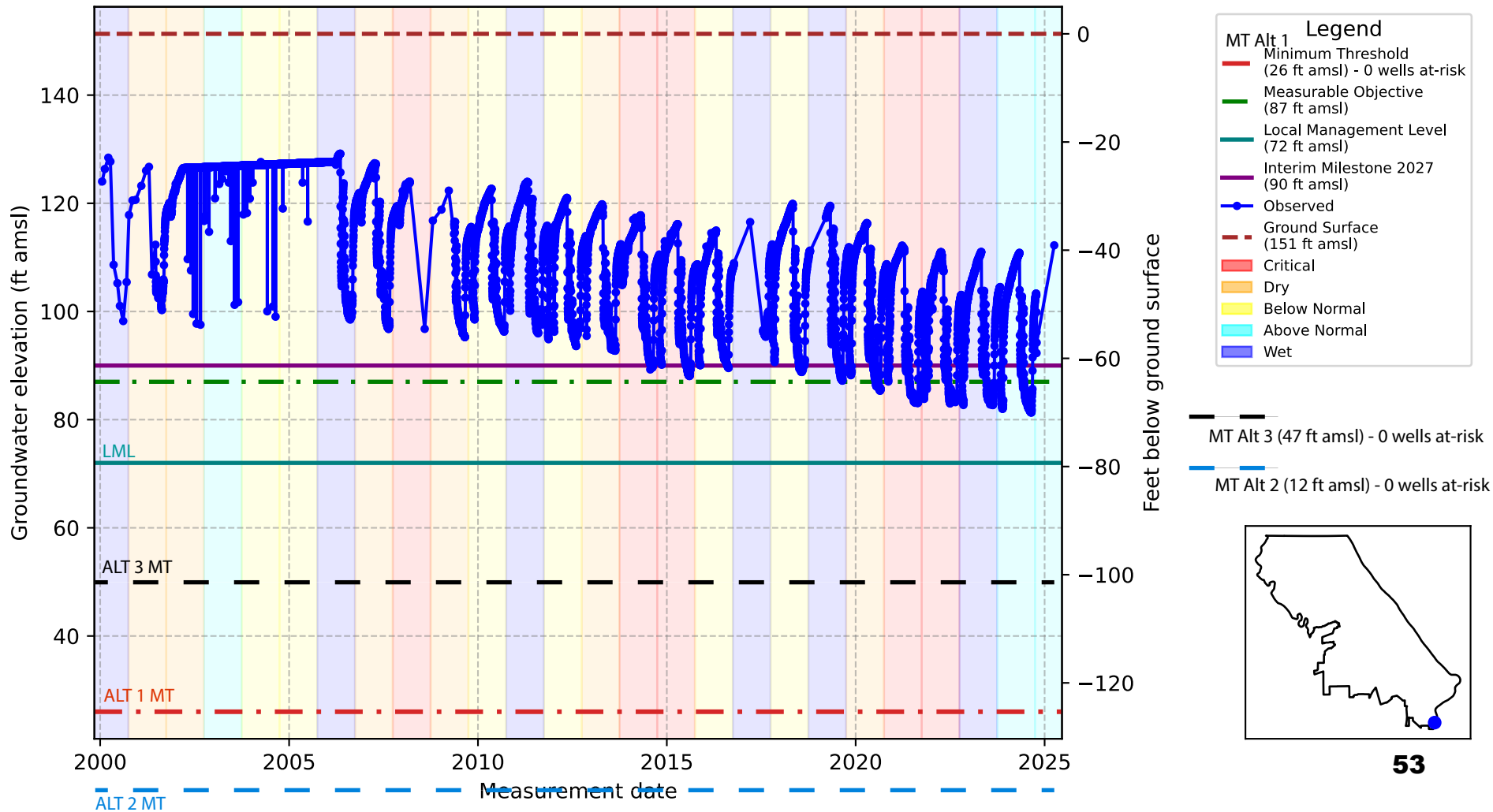
Vina Subbasin - State Well Number (SWN): 21N03E32B001M

Total Number of Domestic Wells = 7



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

Total Number of Domestic Wells = 2



Index	RMS Well	MA	Alternative 1: 2022 MTs + LMLs		Alternative 2: Revised MTs	Alternative 3: Revised MTs, MO minus 40 ft + LMLs for all wells except Chico MA	Difference in MT Elevation (ft): Alt 1 minus Alt 2	Difference in MT Elevation (ft): Alt 1 minus Alt 3	Difference in MT Elevation (ft): Alt 2 minus Alt 3	Total Domestic Wells	Count of Domestic Wells Above MT (includes elevation adjustment)						MO to MT comparison for different Alternatives: Operational Range							
			LML	MT (ft amsl)	MT (ft amsl)	MT (ft amsl)					Alternative 1	Alternative 2	Alternative 3	Difference (Alt 1 minus Alt 2)	Difference (Alt 1 minus Alt 3)	Difference (Alt2 minus Alt 3)	MO (ft amsl)	MO minus Alt3 MT (ft)	MO minus Alt1 MT (ft)	MO minus Alt 2 MT (ft)				
1	23N02W25C001M	North	115	50	83	90	-33	-40	-7	6	2	0	0	2	2	0	130	40	80	47				
2	23N01W09E001M	North	120	68	86	95	-18	-27	-9	12	5	1	0	4	5	1	135	40	67	49				
3	22N01E20K001M	North ^a	100	48	44	75	4	-27	-31	108	4	5	0	-1	4	5	115	40	67	71				
4	22N01W05M001M	North	100	31	30	75	1	-44	-45	1	0	0	0	0	0	0	115	40	84	85				
5	23N01W28M004M	North	103	51	53	78	-2	-27	-25	6	1	0	0	1	1	0	118	40	67	65				
6	23N01W10M001M	North	123	71	53	98	18	-27	-45	7	0	0	0	0	0	0	138	40	67	85				
7	23N01W27L001M	North	106	55	57	81	-2	-26	-24	15	1	1	0	0	1	1	121	40	66	64				
8	23N01E07H001M	North	121	72	123	96	-51	-24	27	32	12	2	5	10	7	-3	136	40	64	13				
9	23N01W14R002M	North	117	66	106	92	-40	-26	14	30	9	2	4	7	5	-2	132	40	66	26				
10	23N01W36P001M	North	93	45	38	68	7	-23	-30	53	2	3	0	-1	2	3	108	40	63	70				
11	23N01E29P002M	North	112	61	78	87	-17	-26	-9	239	59	12	5	47	54	7	127	40	66	49				
12	23N01E33A001M	North ^a	110	72	93	85	-21	-13	8	88	17	4	10	13	7	-6	125	40	53	32				
13	22N01E09B001M	North ^a	98	46	46	73	0	-27	-27	12	1	1	0	0	1	1	113	40	67	67				
14	CWSCH01b	Chico		85	85	85	0	0	0	387	35	35	35	0	0	0	106	21	21	21				
15	CWSCH02	Chico																						
16	CWSCH03	Chico																						
17	CWSCH07	Chico																						
18	21N01E10B003M	South	77	30	51	52	-21	-22	-1	105	33	5	5	28	28	0	92	40	62	41				
19	21N01E27D001M	South	69	23	26	44	-3	-21	-18	61	4	3	0	1	4	3	84	40	61	58				
20	21N01E13L004M	South	67	21	39	42	-18	-21	-3	28	11	5	4	6	7	1	82	40	61	43				
21	21N01E25K001M	South	68	21	57	43	-36	-22	14	27	6	3	3	3	3	0	83	40	62	26				
22	20N01E02H003M	South	58	11	13	33	-2	-22	-20	15	3	1	0	2	3	1	73	40	62	60				
23	20N02E24C001M	South	62	18	15	37	3	-19	-22	7	0	0	0	0	0	0	77	40	59	62				
24	21N02E18C003M	South	115	65	87	90	-22	-25	-3	92	10	5	4	5	6	1	130	40	65	43				
25	21N02E32E001M	South	72	25	58	47	-33	-22	11	110	43	6	15	37	28	-9	87	40	62	29				
26	21N02E26E006M	South	80	36	73	55	-37	-19	18	20	8	1	4	7	4	-3	95	40	59	22				
27	20N02E09G001M	South	72	25	18	47	7	-22	-29	2	0	0	0	0	0	0	87	40	62	69				
28	21N03E32B001M	South	180	133	47	155	86	-22	-108	7	0	0	0	0	0	0	195	40	62	148				
29	20N03E33L001M	South	72	26	12	47	14	-21	-35	2	0	0	0	0	0	0	87	40	61	75				
totals											1472	266	95	94	Average:							39	63	55
percent of total											18%	6%	6%											

Submitted via Comment Form by: Pam Stoesser
Received 7/27/2026

Please follow recommendations of the Stakeholders Advisory Committee, the SHAC, and also the grave concerns expressed by so many of the public, and raise the Minimum Threshold, the MT. The current setting is criminally egregious to the preservation of domestic wells and the safety of our water supply!

Please continue the research necessary to consider our Valley Oaks and our Urban Forest as part of the GDEs. I want our Valley Oaks and Urban Forest protected!

I understand that only 14 out of 29 monitored wells in The Vina subbasin are used to assess and characterize groundwater conditions and this relates to how we define the Minimum Thresholds, MTs and the Measurable Objective, MO. What is the reason for that? Wouldn't it be better to include all 29 wells to get a more accurate picture of groundwater conditions throughout the subbasin? Seems so. I vote for that!

Thank you! Please let's get this right. Let's protect our beautiful source of water from greed, power, and extinction 🙏

Submitted via Comment Form by: Eric Nilsson
Received 7/28/2026

I want to express support for raising the minimum thresholds for our shared groundwater. It is important to determine the threshold needed to maintain the health and well-being of Chico's urban forest. It makes sense that our urban forest be designated as a Groundwater Dependent Ecosystem, one that protects the community's health and well-being and that we all know makes Chico not only livable but special. It is also my understanding that this minimum threshold still needs to be established. As the climate warms, it becomes more critical to protect the trees that shield us from the sun's heat, sequester carbon and provide beauty to our community. To get as thorough a picture as possible about the water levels in our subbasin, we need to be measuring at all 29 Representative Monitoring Sites. Finally, all users of our most precious water resource must share in the responsibility of using it wisely and sustainably.

Submitted via Comment Form by: Evan MacKinnon
Received 5/19/2026

I understand the analysis is limited to the currently available valley-floor groundwater data and that the methodology primarily compares depth-to-groundwater conditions against vegetation rooting depths. The report acknowledge these limitations. That said, the large

reduction in mapped GDE footprint could have important implications for future policy and management of riparian, aquatic, wetland, and floodplain systems if the scope and limitations of the analysis are not emphasized clearly enough.

I recommend more explicitly stating that this assessment is specifically evaluating dependence on mapped shallow groundwater conditions within the Vina Subbasin alluvial system, rather than comprehensively identifying all groundwater-dependent ecosystems or groundwater-supported ecological processes across the broader landscape. Groundwater-dependent features such as springs, perched groundwater systems, foothill wetlands, and spring-fed stream reaches indeed occur outside areas identified as “likely GDEs” by this methodology. For example, springs in Upper Bidwell Park that contribute flow to Big Chico Creek are groundwater-dependent systems by definition, even though they are not classified as likely GDEs under this framework.

The report also notes that it does not evaluate groundwater impacts on interconnected surface water systems, but I think this limitation deserves additional emphasis. In particular, there may still be important hydrologic connections between groundwater conditions in the Vina Subbasin and foothill streams, springs, and perched water tables. Declining groundwater levels in the basin can reduce hydraulic gradients and affect these systems, even where direct rooting access to basin groundwater is absent.

The report recommends that “likely GDEs” be the primary focus for monitoring undesirable impacts of groundwater overdraft. However, foothill springs, tributary streams, and shallow perched groundwater systems (those areas de-emphasized in this study) may provide earlier and more sensitive indicators of groundwater stress than deep basin groundwater levels where they are hydraulically connected to the regional groundwater system. These systems are often lower-storage, pressure-sensitive, and exist near threshold conditions, making them more responsive to relatively small reductions in hydraulic head. As a result, ecological impacts in these environments may become apparent before substantial groundwater declines are observed in deeper basin groundwater monitoring wells.

I also think it would be helpful to further acknowledge ecophysiological uncertainties with GDE-associated plants, including lagged vegetation mortality, chronic effects of drought stress, recruitment failure, species composition shifts, and the difficulty of quantifying long-term ecological impacts. Some groundwater-dependent systems may experience delayed responses to hydrologic stress that are not immediately visible in vegetation indices.

Finally, I’d recommend caution in using 2021 groundwater conditions as a long-term ecological benchmark. Since 2021 was a drought year, using it as a baseline for future management could unintentionally normalize already stressed conditions for local GDEs, riparian systems, springs, and perched groundwater-supported habitats.

I apologize if the authors feel these concerns have already been adequately addressed in the report. However, given the substantial reduction in mapped GDE footprint and the potential management ramifications this could have for local ecosystems, I want to ensure the limitations of the mapping are communicated as clearly as possible so the information is not inadvertently used to justify insufficient protection of the natural landscapes, aquatic systems, and groundwater-supported habitats that are so important to the region. Thank you!

May 18, 2026

Butte County Department of Water & Resource Conservation
308 Nelson Avenue
Oroville, CA 95965

Sent via online comment form ([link](#))

Re: public comment on the Vina GSA Groundwater Dependent Ecosystem Technical Study

To Vina Subbasin Groundwater Sustainability Agency,

Audubon California appreciates the opportunity to provide public comment on the Groundwater Dependent Ecosystem (GDE) Technical Study for the Vina Subbasin. With support from the DWR Underrepresented Communities and California Tribes Technical Assistance (URCTA) Program, we have spent two years providing technical assistance and developing collaborative capacity with the Vina GSA and local environmental stakeholders to build a shared understanding of Groundwater Dependent Ecosystems (GDEs) and identify GDEs that are a high-priority for local stakeholders.

Audubon is grateful for the willingness of the Vina GSA to open dialogue with local stakeholders around GDE analyses that will inform the 5-year GSP update. We look forward to coordinating with the Vina GSA, ESA, and local stakeholders to address the following comments, and would like to express our eagerness to continue supporting a GSP process that is scientifically sound, publicly accessible, and protective of the ecosystems that local stakeholders and wildlife depend on. Specifically, we are eager to find opportunities to coordinate on refinement of the NCCAG database to include non-riparian GDEs that are high priority for the local community.

Our comments are summarized as follows:

1. Correct Editorial Errors and Clarify Regulatory Basis

Numerical errors (pg. 11 and pg. 20). The memo states that 464 of 1,228 potential GDEs were identified as likely GDEs, representing 41 percent of the total. This division gives 37.7 percent. On page 20, the memo states that 78 potential GDEs had centroids in areas with restrictive soil layers within 6 feet of the ground surface, then states that 454 of these were identified as not-likely GDEs. A subset cannot be larger than the total amount. The same section references 646 likely GDEs, conflicting with the 464 figure used throughout the rest of the memo.

Representation of DWR's Recommended Corrective Actions. The memo implies this analysis was conducted to address data gaps identified by DWR in its 2023 Statement of Findings. A review of DWR's Recommended Corrective Actions does not support that characterization. DWR's corrective actions focus on interconnected surface water quantification, water quality, domestic well impacts, and land subsidence. The decision to reclassify 52 percent of potential GDEs is a discretionary methodological choice, not a DWR mandate. Furthermore, this analysis

does not address DWR Corrective Action 3b, which requires the GSA to evaluate the impacts of proposed minimum thresholds on environmental beneficial uses and users of groundwater.

2. Provide Spatial and Plant Community Composition of the 2022 GSP Reclassified GDEs

Audubon is concerned with the magnitude of reduction and spatial distribution of reclassified GDEs that exclude potential GDE sites and species that were expressly identified as high priority by local environmental stakeholders. The ESA analysis results in a reclassification of likely GDEs from 1,046 to 464, representing a net reduction of 55% GDE sites. The spatial distribution and plant community composition of the 640 removed sites is not provided. Given that valley oak accounts for 25 percent of not-likely GDE vegetation and that the 2022 GSP specifically afforded valley oak areas likely GDE status on the basis that this species accesses groundwater over a wide range of depths, Audubon requests transparent access to this information before it is used to update the GSP.

3. Develop Visual Aids and Methodology Clarifying the DTG Interpolation

The interpretation of what the 90th percentile represents has caused confusion among technical assistance providers and local environmental stakeholders. Audubon appreciates the ongoing discussion with the Vina GSA and ESA to clarify the ambiguity in how the 90th percentile threshold is defined and subsequent sensitivity analyses. The sensitivity analysis results also raise questions around the wettest year on record (2005) producing 280 fewer connected GDEs than the 90th percentile analysis. If the 90th percentile already reflects the shallowest conditions, a wetter year should produce more connected GDEs, not fewer. If the interpolated rasters do not accurately reflect conditions in the eastern boundary, implications for the Chico Urban Forest and Bidwell Park are potentially significant.

We request this clarification and the supporting sensitivity analyses be included in the memo for full public transparency. We are eager to work collaboratively on visual aids to increase public transparency and support the GSA in education efforts for non-technical audiences.

4. Explain Connection of Revised Valley Oak Rooting Depth to Rohde et al. 2004 and Include Local Refinement of Urban and Non-Riparian GDEs as a Project and Management Action

The memo assigns valley oaks a rooting depth of 18.2 feet, citing Rohde et al. 2024. The broader scientific literature strongly supports a deeper rooting depth, and our technical partners at TNC have identified this as a misrepresentation of that paper. Valley oak is the largest species category among sites reclassified as not-likely GDEs in this analysis, accounting for 25 percent of not-likely GDE vegetation. The choice of rooting depth for this species is a likely driver of overall GDE re-classification, especially in priority areas that are entirely eliminated under this analysis. Audubon requests that ESA provide detailed explanation of the 18.2-foot figure with specific citation to the relevant analysis in Rohde et al. 2024

The memo's introduction correctly recognizes oak woodlands as an example of GDEs. However, the NCCAG database, which serves as the starting point for this entire analysis, was built primarily on riparian vegetation layers and has known significant gaps for terrestrial oak savannahs and urban tree canopy. This was not a deliberate exclusion but an artifact of limitations in the vegetative data layers used to construct the NCCAG dataset. As a result, the analysis cannot make meaningful determinations about the GDE status of the Chico Urban Forest or non-riparian valley oak and blue oak woodlands. The same USGS dataset cited in the NCCAG metadata designated blue oak as groundwater-dependent, yet blue oaks are not included in the NCCAG layer. Urban vegetative datasets were not incorporated into NCCAG. Absence from the NCCAG

database is not evidence of absence of GDE status, and the amended GSP should not rely on this analysis to draw that conclusion.

Audubon views these data gaps as an opportunity for future refinement rather than a settled determination.

5. Integrate Ecological Threshold Analysis into the Development of MTs and MOs as required under SGMA and DWR Corrective Action 3b

The memo proposes that an Undesirable Result for GDEs be triggered only when the area of connected GDEs falls to levels observed during spring 2021 and remains there for three consecutive years. Spring 2021 was the lowest water year on record since 2000, during which only 64 GDE polygons covering 437 acres remained connected. Using the worst observed conditions as the management floor means groundwater could approach record drought levels before any protective action is required. The memo acknowledges that prolonged disconnection increases the potential for plant mortality, but the proposed three-consecutive-year duration criterion delays any response even after the floor is reached.

Audubon recommends the Vina GSA consider using TNC's GDE prioritization framework and ecological thresholds to inform MTs and groundwater management as this approach would directly address requirements under SGMA while also setting protective thresholds.

6. Evaluate Applied Water as a GDE Support Mechanism in the Updated GSP

The memo highlights a potential amplifying impact to GDEs from declining groundwater levels and reduced access to surface access from pumped groundwater. GDEs can be obligate (full-time) or facultative (part-time) users of groundwater. Research establishes a clear principle that surface water usage does not indicate a lack of groundwater dependency during all or part of a vegetative GDE's life cycle. The memo presents its DTG methodology as an improvement over the 2022 GSP because it does not use proximity to irrigation or access to alternative water sources as exclusion criteria. However, the memo explains the not-likely classifications as being driven primarily by proximity to irrigation, land use changes, and access to alternative water sources.

The memo also acknowledges that applied water supporting vegetation near excluded GDE sites is often derived from deep aquifer pumping. Under SGMA management scenarios that reduce pumping, both shallow groundwater and applied water availability could decline simultaneously. A site excluded from GDE protection today because it has access to applied water may have neither shallow groundwater nor applied water under future conditions.

Audubon California is grateful for the opportunity to engage in this process and looks forward to continued collaboration with the Vina GSA, ESA, and local stakeholders as the 5-year GSP update moves forward. We remain committed to being a constructive partner in making this process scientifically sound and publicly accessible.

Sincerely,

Taylor Broadhead

Taylor Broadhead, Audubon California Senior Manager Water Policy

AGRICULTURAL GROUNDWATER USERS OF BUTTE COUNTY

Staff White Paper · May 2026

Vina Subbasin GDE Technical Study — Issues and Recommendations

Overview. The March 2026 Vina GSA Groundwater-Dependent Ecosystem Technical Study (ESA) provides a useful regional screening of potential GDEs in the Subbasin. AGUBC supports SGMA-consistent protection of verified groundwater-dependent ecosystems. The Study’s proposed regulatory framework, however, rests on methodological choices that, if adopted without modification, would impose pumping constraints disconnected from demonstrated environmental harm. The framework is also inconsistent with SGMA’s statutory text and DWR’s Best Management Practice guidance.

The headline 464 figure is a methodology choice, not a finding. The Study analyzed six hydrologic scenarios. The count of polygons classified as “likely GDE” varies by more than an order of magnitude across those scenarios: 464 (Spring 90th percentile, 2020-2024), 100 (Spring 2015), 64 (Spring 2021), 38 (Fall 90th percentile), 21 (Fall 2015), and 17 (Fall 2021). Five of the six scenarios yield 100 or fewer polygons. ESA recommends the highest figure — 464 — as the regulatory universe without identifying that selection as a policy choice. The Fall 90th percentile, 2020-2024, equally a “typical” hydrologic baseline, yields 38 polygons — a 92 percent reduction. Notably, the season selected drives more of the variance in the result than the hydrologic year selected: the Spring-to-Fall ratio at the 90th percentile is approximately 12 to 1, while the year-to-year ratio within Spring (90th percentile to 2021) is approximately 7 to 1. ESA’s selection of a spring-only baseline therefore embeds a methodology choice with greater regulatory consequence than the year choice. The choice of regulatory universe is not a technical finding; it is an ESA policy decision that should be made transparently to the GSA Board with full bracketed analysis of all six scenarios.

The proposed Undesirable Result floor is set at the driest year on record and falls below the 2015 statutory reference point. ESA recommends that connected GDE area shall not fall below 437 acres (Spring 2021) for three consecutive years. The Study itself acknowledges Spring 2021 as “the lowest water year on record since 2000.” Setting the floor at the driest single year on record conflates drought with management failure.

Water Code § 10721(x)(1) — the SGMA undesirable result definition — provides that “overdraft during a period of drought is not sufficient to establish a chronic lowering of groundwater levels if extractions and groundwater recharge are managed as necessary to ensure that reductions in groundwater levels or storage during a period of drought are offset by increases in groundwater levels or storage during other periods.” This statutory carve-out reflects the Legislature’s understanding that SGMA regulates management decisions, not weather. DWR’s *Sustainable Management Criteria* BMP applies the same principle to depletion-of-interconnected-surface-

water thresholds, directing GSAs to consider “historical rates of stream depletion for different water year types” when setting those thresholds.

The Study’s own data confirm the problem. Spring 2015 — itself a critically dry year — yielded 100 likely-GDE polygons. Spring 2021 yielded 64. The proposed regulatory floor therefore sits below the January 1, 2015 statutory reference point established by Water Code § 10727.2(b)(4). The three-consecutive-year trigger does not cure this defect; consecutive dry years (as occurred during 2020–2022) would mechanically trigger an undesirable result finding even where management has not changed and pumping has not increased.

The Study’s own evidence does not establish a strong groundwater-vegetation link. The Study reports a correlation coefficient of -0.17 between groundwater elevation and NDVI vegetation health across all potential GDEs (p. 23), with 45 percent of polygons showing a negative relationship and 48 percent showing a positive relationship — a distribution indistinguishable from statistical noise. The Study acknowledges that “uncertainties and data gaps remain regarding the relationship between shallow groundwater levels and GDE NDVI.” A coefficient of -0.17 cannot do the analytical work that an undesirable result finding requires under DWR’s BMP framework, which conditions such findings on identification of the cause of the groundwater conditions and articulation of criteria defining when those conditions become significant and unreasonable.

Agricultural applied water may support the same GDEs the proposed criteria seek to protect. The Study concedes (p. 35–36) that applied water for irrigated agriculture “has ancillary benefits to GDEs” and that changes to pumping “may have negative consequences ... to GDEs.” This tradeoff is acknowledged but not analyzed quantitatively. Without such analysis, pumping restrictions designed to protect GDEs could measurably harm the ecosystems the proposed criteria seek to protect — an outcome inconsistent with the Vina GSP’s stated objectives.

Recommendations. AGUBC recommends incorporating the following:

- **Bracketed scenario reporting.** All six TM scenarios shall be presented as policy options. Selection of the regulatory universe shall be presented transparently as a policy choice by the GSA Board, not embedded as a technical finding.
- **Dual-season screening criterion.** A polygon shall qualify as a likely GDE only where groundwater connection is demonstrated in both spring and fall measurements. Sustained year-round groundwater connection is the ecological definition of a groundwater-dependent ecosystem; spring-only connection may reflect vernal pool, ephemeral riparian, or winter-rainfall hydrology rather than dependence on the regional aquifer.
- **2015 baseline with causation requirement.** Consistent with Water Code §§ 10721(x)(1) and 10727.2(b)(4) and the BMP’s directive that GSAs identify and investigate the causes of undesirable results, an Undesirable Result finding for depletion of interconnected surface water shall not be triggered solely by drought-year conditions. The regulatory

reference point shall be conditions as of January 1, 2015, and any finding shall be supported by analysis demonstrating that observed change is attributable to GSA-controlled pumping rather than natural hydrologic variability.

- **Shallow-aquifer monitoring before binding criteria.** The 2022 GSP RMS network is screened in the deeper aquifer, as the Study acknowledges on p. 32. The Vina GSA Board approved the SGM-funded shallow-aquifer monitoring network — nine new shallow wells, one multi-completion well, three to four stream gages, and continuous monitoring at eight domestic wells — on December 11, 2024, with grant funds required to be expended by March 2026. Binding GDE criteria shall be deferred to the 2032 Periodic Evaluation, allowing several water years of shallow-aquifer-specific data from this network to inform any subsequent regulatory determinations.
- **Applied-water tradeoff analysis.** A quantitative analysis of agricultural applied water's net effect on GDEs shall precede any pumping-restriction-based GDE criteria.

Conclusion. AGUBC values both the ecological resources of the Vina Subbasin and the agricultural economy that has shaped it. We support a Periodic Evaluation that reflects best-available science, distinguishes management-driven from climate-driven change, complies with the statutory and BMP framework that governs Undesirable Result findings, and preserves the operational flexibility SGMA contemplates.

Attachment.

From: [Jim Brobeck](#)
To: [Fairbanks, Rebecca \(Becky\); vinagsa comments](#)
Subject: Comments on the GDE Technical Study
Date: Friday, May 15, 2026 11:09:58 AM
Attachments: [ESA GDE Technical Study comments.docx](#)

ATTENTION: This message originated from outside **Butte County**. Please exercise judgment before opening attachments, clicking on links, or replying.

Hi Becky,

I have a previously scheduled medical appointment on Monday morning so I cannot attend this meeting. I have reviewed the ESA memorandum and found many areas of great concern that I have outlined in the attached document.

Please confirm receipt of this email and let me know if my comments will be entered into the record.

Thanks,

Jim Brobeck



Virus-free. www.avast.com

The event: <https://www.vinagsa.org/2026-05-18-event-groundwater-dependent-ecosystem-discussion>
the memorandum: https://www.vinagsa.org/files/06cadbb73/Vina_GSA_GDE_TM.pdf

The Vina Groundwater Sustainability Agency created a Plan did not bestow the Chico Urban Forest and non-riparian oak woodlands with Groundwater Dependent Ecosystems status that require protection under SGMA. The resulting plan allows aquifer level operating thresholds to fall below the rooting depth of these terrestrial treasures. While SGMA does not include these forests the public has voiced strong support for raising the "minimum thresholds" underground to protect the canopy.

SGMA included novel stakeholder engagement requirements to give voice to the environmental users of groundwater. Unfortunately, the Vina GSA plan discounted the concerns of the environmental community by excluding most native oak woodlands and the locally valued groundwater dependent urban forest. In signing SGMA, then-Governor Jerry Brown emphasized that "groundwater management in California is best accomplished locally."

Senate Bill No. 1168 [one of SGMA's founding documents] CHAPTER 346
Chapter 5. Powers and Authorities states:

"A groundwater sustainability agency has and may use the powers in this chapter to provide the maximum degree of local control and flexibility consistent with the sustainability goals of this part." . While SGMA does not include urban forest as GDE the public has voiced strong support for raising the "minimum thresholds" underground to protect the trees and their numerous environmental services..

LOCAL stakeholders overwhelmingly voice the need to maintain aquifer levels adequate to groundwater dependent vegetation. Richie Bamlet, retired Chico Urban Forester, explained that the trees of Chico are dependent on tapping the capillary fringe of Chico's water table. The environmental services provided by the urban forest are well known.

An urban groundwater-dependent forest is a tree or shrub canopy in a city or town that relies on groundwater for moisture. According to the US Forest Service, these urban forest

systems play a critical role in stormwater management by reducing runoff intensity, and promoting infiltration into soil.

Urban trees in groundwater-dependent settings, help mitigate the hydrological impacts of urbanization by:

- Rainfall interception: Canopy reduces rainfall intensity and delays runoff timing.
- Infiltration: Tree roots and associated soils allow stormwater to percolate into the ground, recharging groundwater.
- Nutrient uptake: They absorb pollutants from runoff, improving water quality.
- Improve air quality and urban microclimates.
- Provide habitat for wildlife.
- Enhance community aesthetics and recreation opportunities.

In summary: Urban groundwater-dependent forests are valuable green infrastructure assets that can significantly reduce stormwater runoff, recharge groundwater, and improve water quality. Strategic canopy preservation and integration into stormwater management plans can maximize their environmental and community benefits.

Local control and flexibility consistent with sustainability goals requires protecting the environmental benefits and services of the groundwater dependent Chico Urban Forest.

ESA memorandum comments:

Pg3 [Previous GSP] Examples of GDEs include ... oak woodlands.

PG 4 “Additionally, the [Vina GSP] maps also show the location of Valley Oak Dominated Areas which are classified as “Likely a GDE” because, per the Vina GSP, this species can access groundwater over a wide range of depths.” The Memo redefines potential GDEs by falsely claiming oak trees can only reach 18.2’ deep and the Memo maps of GDEs on pg 15 are narrowly confined to areas that have high GW due to creek/river proximity. Even the Vina GSP GDE maps are faulty because they exclude middle park oak woodlands and urban valley oak pockets. The Memo maps are even worse by eliminating all non-riparian oak woodlands!

PG 5 “fourteen (14) additional shallow wells not included in the original Vina GSP monitoring network were identified that could fill spatial gaps in the monitoring network. These wells are located within the City of Chico as part of the City’s nitrate monitoring program, on CSU Chico’s campus, Neal Road landfill, and at other Department of Toxic Substances Control (DTSC) groundwater contamination monitoring sites (e.g., Chico Central Plume, municipal airport, etc.)” The location, depth below ground surface of water should be revealed and the data used to determine DBS of the Chico Urban GW.

Pg 5 The overall approach for characterizing GDE ecological conditions was to assess regional trends in Normalized Derived Vegetation Index (NDVI) at all potential GDEs.

Pg 6 Rooting depths were taken from updated values developed in a 2024 statewide study of vegetation health in groundwater dependent ecosystems (Rohde et al., 2024).

Why does the Rohde rooting depth of “oaks” differ significantly from the literature? pg

Pg 7 “oak rooting depth of 18.2” *US Forest Service: “Valley oak typically has several vertical roots that tap groundwater and extensive horizontal root branches [28,31]. Vertical root depth has been measured as deep as 80 feet.”*

Quercus lobata <https://www.fs.usda.gov/database/feis/plants/tree/quelob/all.html> The US Forest Service article on Valley Oaks explains:

“Another major management concern is loss of mature trees. Valley oak have died in some areas because of greatly lowered water tables.

Trees are resistant to short-term drought; mature trees suffer drought damage only when a series of dry seasons lower water tables to extreme depths [28].

Valley oak typically has several vertical roots that tap groundwater and extensive horizontal root branches [28,31]. Vertical root depth has been measured as deep as 80 feet (262 m) in some individuals [45]. The oaks depend on water-table access [14]. Best growth is attained when water tables are about 33 feet (10 m) below the surface

[5]. **The report’s** Rhode TABLE 1. ADJUSTED ROOTING DEPTH FOR DOMINANT VEGETATION FOR POTENTIAL GROUNDWATER DEPENDENT ECOSYSTEMS pg 7 oak rooting depth of 18.2’ **allows the GSP to exclude deep rooted plants from GDE designation except near streams.**

Pgs 11-12: “This area of elevated groundwater levels is bounded by the Sacramento River to the west and extends eastward to approximately the Southern Pacific Railroad and southward to around Bidwell Sacramento River State Park. Additional likely GDEs occur in the western portion of the Subbasin along many of the surface waters that are tributary to the Sacramento including along Dircus Slough, Pine Creek, Rock Creek, Mud Creek, Big Chico Creek, Little Chico Creek, Angel Slough, and Butte Creek. East of the railroad, and across much of the southern portion of the Subbasin, DTG is typically deeper than the rooting depth of potential GDEs” **By claiming that oak roots can only reach to 18.2’ and DTG [Depth to Groundwater] is always deeper they justify designating only riparian vegetation as GDEs.**

5. Barbour, Michael G. 1987. Community ecology and distribution of California hardwood forests and woodlands. In: Plumb, Timothy R.; Pillsbury, Norman H., technical coordinators. Proceedings of the symposium on multiple-use management of California's hardwood resources; 1986 November 12-14; San Luis Obispo, CA. Gen. Tech. Rep. PSW-100.

Berkeley, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Forest and Range Experiment Station: 18-25. [5356]

14. Callaway, Ragan M. 1990. Effects of soil water distribution on the lateral root development of three species of California oaks. *American Journal of Botany*. 77(11): 1469-1475. [13784]
28. Griffin, James R. 1973. Xylem sap tension in three woodland oaks of central California. *Ecology*. 54(1): 152-159. [3707]
31. Griffin, James R. 1977. Oak woodland. In: Barbour, Michael G.; Malor, Jack, eds. *Terrestrial vegetation of California*. New York: John Wiley and Sons: 383-415. [7217]
45. Lewis, D. C.; Burgy, R. H. 1964. The relationship between oak tree roots and groundwater in fractured rock as determined by tritium tracing. *Journal of Geophysical Research*. 69(12): 2579-2587. [249]

Valley oaks have a **dimorphic root system** with two distinct root forms, which are adapted to perform different functions. These oaks have taproots, which grow straight down to the water table, from which they obtain water for the plant; and a system of lateral roots, which obtain nutrients from superficial soil layers near the surface. They are deep rooted plants that only inhabit areas where they can access groundwater, via the capillary fringe, to satisfy their environmental water requirement. Access to groundwater is critically important to their presence in a landscape.

Plant roots in natural communities are often linked by **shared** or common **mycorrhizal networks** (CMNs) that constitute pathways for the transfer of resources among plants. In addition, plants with deep roots are able to lift up and redistribute water to the upper layers through a process known as hydraulic lift, potentially acting as “bioirrigators” to adjacent plants.

The Chico Urban forest and nearby oak woodlands thrive during the hot summer months by tapping the capillary fringe of the water table. The Urban Forest has numerous pockets of native oak trees that, along with other deep rooted trees, pull water from the shallow aquifer into the rooting zones of vegetation that are not so well endowed with such deep roots. It is irresponsible to exclude these arboreal treasures from GDE protection by saying if the water table is below 18.2’ the plants can’t possibly reach the water table. Such a conclusion allows the inappropriate, unprotective, extremely low Minimum Threshold operating range.

From: jimb@aqualliance.net
To: [Fairbanks, Rebecca \(Becky\)](#)
Cc: [Loeser, Kamie](#); [Buck, Christina](#)
Subject: Chico Urban Forest & GDE Analysis comments
Date: Monday, May 4, 2026 1:13:16 PM

.ATTENTION: This message originated from outside Butte County. Please exercise judgment before opening attachments, clicking on links, or replying..

Hi Becky,

I am grateful that you are hosting a meeting on this issue.

Unfortunately I have a Dr appointment at 9:15 but I will try to catch the first minutes of the meeting. Please consider these comments on raising the MT to protect the Chico Urban Forest and the non-riparian oak woodlands in the Vina sub-basin:

SGMA included novel stakeholder engagement requirements in an attempt to give voice to environmental users of groundwater. Unfortunately, the Vina GSA plan discounted the concerns of the environmental community by excluding most native oak woodlands and the locally valued groundwater dependent urban forest. In signing SGMA, then-Governor Jerry Brown emphasized that “groundwater management in California is best accomplished locally.”

Senate Bill No. 1168 [one of SGMA’s founding documents] CHAPTER 346 Chapter 5. Powers and Authorities states:

“A groundwater sustainability agency has and may use the powers in this chapter to provide the maximum degree of local control and flexibility consistent with the sustainability goals.”

LOCAL stakeholders overwhelmingly voice the need to maintain aquifer levels adequate to keep groundwater dependent vegetation healthy, even during dry years. Richie Bamlet, retired Chico Urban Forester, explained that the trees of Chico are dependent on tapping the capillary fringe of Chico’s water table. The environmental services provided by the urban forest are well known.

An urban groundwater-dependent forest is a tree canopy in a city or town that relies on groundwater for moisture. These forests play a critical role in stormwater management by intercepting rainfall, reducing runoff intensity, and promoting infiltration into soils. (US Forest Service)

Urban trees in groundwater-dependent settings, help mitigate the hydrological impacts of urbanization by:

- Rainfall interception: Canopy reduces rainfall intensity and delays runoff timing.
- Infiltration: Tree roots and associated soils allow stormwater to percolate into the ground, recharging groundwater.
- Nutrient uptake: They absorb pollutants from runoff, improving water quality.

Urban groundwater-dependent forests also:

- Improve air quality and urban microclimates.
- Provide habitat for wildlife.
- Enhance community aesthetics and recreation opportunities .

In summary: Urban groundwater-dependent forests are valuable green

infrastructure assets that can significantly reduce stormwater runoff, recharge groundwater, and improve water quality. Strategic groundwater management, canopy preservation, and integration into stormwater management plans can maximize their environmental and community benefits.

Local control and flexibility consistent with sustainability goals requires protecting the environmental benefits and services of the groundwater dependent Chico Urban Forest and non-riparian Valley and Blue Oak woodlands.

Cheers!

Jim Brobeck, Environmental Community SHAC Representative (dismissed),
Butte Water Advisory Committee (emeritus)



Vina Groundwater Sustainability Agency

Agenda Transmittal

Subject: Drought Resilience Plan Update

Contact: Kamie Loeser

Phone: (530) 552-3595

Meeting Date: August 12, 2026

Agenda Item: 4.3

Summary:

On September 23, 2021, Governor Newsom signed into law SB 552 (Hertzberg), which assigned new responsibilities and requirements for the State of California (State) and local agencies to help small water suppliers and rural communities reduce their risks of inadequate water supply amid a water shortage event. SB 552 specifically required all counties to improve drought and water shortage preparedness for state small water systems and domestic wells within a county's jurisdiction by 1) establishing a standing Drought and Water Shortage Task Force (Drought Task Force) and 2) developing a County Drought Resilience Plan (DRP).

The existing Butte County Drought Preparedness and Mitigation Plan was adopted by the Board of Supervisors in October 2004 (2004 Drought Plan). However, that Plan needed to be updated to comply with SB 552 by incorporating the required drought and water shortage risk assessment, identifying short and long-term response actions that specifically address state small water systems and domestic wells, and other implementation considerations. In addition, the preparation of the County DRP would also reflect other current laws, programs, and activities being conducted by County departments and other local agencies (i.e., Groundwater Sustainability Agencies).

Butte County Department of Water and Resource Conservation has released a Draft Drought Resilience Plan for public review and comment through August 28, 2026. Department staff will present an overview of the DRP.
(Report – Kamie Loeser, Director, Butte County Water & Resource Conservation)

Relevant Links:

Draft Plan available at: <https://www.buttecounty.ca.gov/2281/Drought-Resilience-Plan>

Requested Action: Accept as information, provide comments as appropriate.



Vina Groundwater Sustainability Agency Agenda Transmittal

Subject: Drought Resilience Plan Update

Contact: Kamie Loeser

Phone: (530) 552-3595

Meeting Date: August 12, 2026

Agenda Item: 4.3

Summary:

Butte County Department of Water and Resource Conservation has released a Draft Butte County Drought Resilience Plan for public review and comment through August 28, 2026. Staff will present an overview of the draft plan. **(Report – Kamie Loeser, Director, Butte County Water & Resource Conservation)**

Relevant Links:

Draft Plan available at: <https://www.buttecounty.ca.gov/2281/Drought-Resilience-Plan>

Requested Action: Accept as information.

VINA GSA MTG AGENDA ITEM 3.1



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

**Rock Creek
Reclamation District**
P.O Box 1679
Oroville, CA 95965-1679
(530) 533-2855



VINA GSA AND ROCK CREEK RECLAMATION DISTRICT GSA JOINT BOARD MEETING MINUTES

July 8, 2026

1. VINA GROUNDWATER SUSTAINABILITY AGENCY (GSA) BOARD MEETING

1.1. Call To Order: 3:33 p.m.

1.2. Roll Call

Board Members Present:

Katie Hawley – City of Chico
Derek Sohnrey – Durham Irrigation District
Jim Graydon – Domestic Well Users Representative
Tod Kimmelshue – Butte County (Vice Chair)

Board Members Absent:

Jeffrey Rohwer – Agricultural Well Users Representative (Chair)

2. ROCK CREEK RECLAMATION DISTRICT (RCRD) GSA BOARD MEETING

2.1. Call to Order - Meeting Called to order by RCRD Board Chair

2.2. Roll Call - Roll call taken by RCRD Board Chair

3. BUSINESS FROM THE FLOOR

Members of the public were invited to address the Vina GSA and RCRD GSA Boards at this time on any matter not already listed on the agenda.

PUBLIC COMMENTERS: <NONE>

4. JOINT VINA GSA/RCRD GSA BOARD MEETING AGENDA

4.1. *Update on the Status and Anticipated Timeline for the Vina Groundwater Sustainability Plan (GSP) Periodic Evaluation

Staff provided an update on the anticipated topics and timelines over the next several months related to the Periodic Evaluation and gave a review of related webpages and interactive maps available to support the discussions. **(Verbal Report – Becky Fairbanks, SGM Grant Projects Manager)**

Requested Action: Accept as information.

PUBLIC COMMENTERS:

1.) Pam Stoesser

ACTION: Accepted as information

4.2. *North Sacramento River Corridor (NSRC) Interbasin Coordination Framework Update and Regional Interconnected Surface Water Initiative

The Vina Subbasin participates in the North Sacramento River Corridor (NSRC) Interbasin Coordination (IBC) effort, a collaborative program among seven hydrologically connected subbasins in the Northern Sacramento Valley. Staff presented an update on the NSRC IBC Framework 5-Year Implementation Update, which guides regional coordination through the 2027 Periodic Evaluations and beyond. The presentation also covered a proposed regional approach to interconnected surface water management, the corridor's current top coordination priority and a shared regulatory obligation across all seven NSRC subbasins. (*Report – Dillon McGregor, GSA Program Manager and Christina Buck, Assistant Director, Butte County Water & Resources Conservation*)

Requested Action: Staff recommended the Boards receive this report and provide feedback on the North Sacramento River Corridor Interbasin Coordination Framework 5-Year Implementation Update and the proposed regional Interconnected Surface Water approach.

PUBLIC COMMENTERS:

- 1.) Suzanne Schrader
- 2.) Greg Brislain

ACTION: Feedback provided was supportive of the approach being taken.

4.3. *Introduction to the Groundwater Level Strawman Proposal including discussion of the proposed 2027 Representative Monitoring Site (RMS) Monitoring Network and recent analysis of Groundwater Dependent Ecosystems (GDE) in the Vina Subbasin

Staff presented an overview of the recently released Groundwater Level Sustainability Indicator strawman proposal (an initial draft created to jump-start discussion serving as a starting point for collaborate refinement). The presentation included relevant context including recent and historical groundwater level conditions, evaluation of the groundwater monitoring network, and recent analysis contributing to characterization of Groundwater Dependent Ecosystems in the Vina Subbasin. The Board was asked to discuss and provide feedback on the monitoring network aspects of the strawman proposal. (*Report – Christina Buck, Assistant Director, Butte County Water & Resources Conservation*)

Requested Action: Discussion and direction regarding changes to the Groundwater Level RMS network.

PUBLIC COMMENTERS:

- 1.) Patrizia Hironimus
- 2.) Pam Stoesser
- 3.) Susan Schrader
- 4.) Anne Dawson
- 5.) Marty Dunlap
- 6.) Jon Hooper
- 7.) Greg Brislain

ACTION: Both GSA boards expressed support for the expanded RMS network for the Groundwater Level sustainability indicator.

4.4. *Update and Discussion of Sustainable Yield, Groundwater Extraction and Change in Storage Calculations to Guide Periodic Evaluation Content Development

The Board received an overview of how sustainable yield, groundwater extraction, and change in groundwater storage have been estimated in the Vina Subbasin Groundwater Sustainability Plan and recent Annual Reports. The discussion will provide context for addressing Department of Water Resources comments through the upcoming Periodic Evaluation and will provide an opportunity for questions and

Board input on the proposed approach going forward. (**Report – Christina Buck, Assistant Director, Butte County Water & Resources Conservation**)

Requested Action: Provide feedback to staff.

PUBLIC COMMENTERS:

- 1.) Jeanette Alosi – Emailed Comment
- 2.) Anne Dawson
- 3.) Greg Brislain

ACTION: Guidance was given for staff to bring sustainable yield back to the Boards at a later meeting for further discussion as needed.

5. ADJOURNMENT:

The Vina GSA/RCRD GSA Joint Board meeting adjourned to the Vina GSA Meeting at 5:22 p.m.

*****RECONVENE TO VINA GSA BOARD MEETING*****

1. Vina Groundwater Sustainability Agency (GSA) Board Meeting

1.1 Call To Order: 5:27 p.m.

1.2 Roll Call

Board Members Present:

Katie Hawley – City of Chico
Derek Sohnrey – Durham Irrigation District
Jim Graydon – Domestic Well Users Representative
Tod Kimmelshue – Butte County (Vice Chair)

Board Members Absent:

Jeffrey Rohwer – Agricultural Well Users Representative (Chair)

2. CONSENT AGENDA:

2.1 *Approval of the 6-10-26 Vina GSA Board Meeting Minutes.

Requested Action: Approve the 6-10-26 Vina GSA Board meetings minutes.

PUBLIC COMMENTERS: <NONE>

ACTION: A motion to approve the 6/10/2026 meeting minutes was made by Board Member Sohnrey. The motion was seconded by Board Member Hawley. The Motion passed with the following vote:

AYES: Board Members Hawley, Sohnrey, Graydon, and Vice Chair Kimmelshue

NOES: <NONE>

ABSTAIN: <NONE>

ABSENT: Chair Rohwer

3. ITEMS REMOVED FROM CONSENT: <NONE>

4. REGULAR AGENDA:

4.1 *Consideration of Fiscal Year 2025-26 Annual Operations Budget Adjustment

The Vina Groundwater Sustainability Agency Board of Directors adopted the Fiscal Year 2025-26 Annual Operations Budget (Resolution 2025-01) on June 11, 2025. This item presented an adjustment to reflect grant activity not included in the adopted budget, including additional DWR SGM Round 2 Grant expenditures and the addition of the CalSIP stream gage grant. The adjustment has no effect on the operational budget or the SGMA regulatory fee **(Report – Dillon McGregor, GSA Program Manager)**

Requested Action: Adopt Resolution No. 2026-04, Approving an Amendment to the Fiscal Year 2025-26 Annual Operations Budget and authorize the Chair to sign.

PUBLIC COMMENTERS: <NONE>

ACTION: A motion to adopt resolution No. 2026-04, Approving an Amendment to the Fiscal Year 2025-26 Annual Operations Budget and authorizing the Chair to sign was made by Board Member Sohnrey. That motion was seconded by Board Member Hawley. The motion passed with the following vote:

AYES: Board Members Hawley, Sohnrey, Graydon, and Chair Kimmelshue

NOES: <NONE>

ABSTAIN: <NONE>

ABSENT: Chair Rohwer

4.2 *Consideration of Fiscal Year 2026-27 Annual Operations Budget Adjustment

The Vina Groundwater Sustainability Agency Board of Directors adopted the Fiscal Year 2026-27 Annual Operations Budget (Resolution 2026-01) on June 10, 2026. This item presents an adjustment to add the CalSIP stream gage grant, which was not included in the adopted budget. The adjustment has no effect on the operational budget or SGMA regulatory fee. **(Report – Dillon McGregor, GSA Program Manager)**

Requested Action: Adopt Resolution No. 2026-05, Approving an Amendment to the Fiscal Year 2026-27 Annual Operations Budget, and authorize the Chair to sign.

PUBLIC COMMENTERS: <NONE>

ACTION: A Motion to adopt Resolution No. 26-05, Approving an Amendment of the Fiscal Year 2026-27 Annual Operations Budget and authorizing the Chair to sign was made by Board Member Hawley. The Motion was seconded by Board Member Sohnrey. The motion passed with the following vote:

AYES: Board Members Hawley, Sohnrey, Graydon, and Vice Chair Kimmelshue

NOES: <NONE>

ABSTAIN: <NONE>

ABSENT: Chair Rohwer

4.3 *Consideration of Resolution No. 2026-02 Setting Regulatory Sustainable Groundwater Management Act Fees for Fiscal Year 2026-27

The Vina Groundwater Sustainability Agency (GSA) Board considered adopting the SGMA regulatory fees for Fiscal Year 2026-27. At the June 10, 2026 Board meeting, the Board held adoption of the fee pending verification that the correct fee calculation methodology had been followed. The proposed fees have since been recalculated by Hansford Economic Consulting (HEC) in accordance with the 5-year outlook methodology authorized by Resolution No. 2025-02. Fee amounts are set forth in Attachment A. **(Report – Dillon McGregor, GSA Program Manager)**

Requested Action: Adopt Resolution No. 2026-02, Setting Regulatory Sustainable Groundwater Management Act Fees for Fiscal Year 2026-27, and authorize the Chair to sign.

PUBLIC COMMENTERS: <NONE>

ACTION: A motion to adopt Resolution No. 2026-02, Setting Regulatory Sustainable Groundwater Management Act Fees for Fiscal Year 2026-27 and authorizing the Chair to sign was made by Board

Member Graydon. The motion was seconded by Board Member Hawley. The motion passed with the following vote:

AYES: Board Members Hawley, Sohnrey, Graydon, and Kimmelshue

NOES: <NONE>

ABSTAIN: <NONE>

ABSENT: Board Member Rohwer

5. COMMUNICATIONS AND REPORTS

5.1 Program Manager Report (Information Only - Dillon McGregor, GSA Program Manager)

- RFP Selection Process Update
- Drought Resilience Plan Update
- Environmental Health

6. BOARD MEMBER REQUESTS FOR FUTURE ITEMS:

Board Member Hawley requested revisiting GSA meeting start time of 3:30 with the full board at the next meeting.

Board Member Kimmelshue would like to discuss Rock Creek / Keifer Slough flooding and recharge projects after the periodic evaluation.

7. ADJOURNMENT:

The Vina GSA Board meeting will adjourn to Closed Session after tonight's Vina GSA Board Meeting.

1. CLOSED SESSION PUBLIC COMMENTS OR BOARD DISQUALIFICATIONS:

Members of the public were invited to address the Board on the closed session item only.

PUBLIC COMMENTERS: <NONE>

2. ADJOURN TO CLOSED SESSION: 6:00 p.m.

3. CLOSED SESSION

3.1 Call to Order

4. CLOSED SESSION AGENDA

- 4.1 PURSUANT TO GOVERNMENT CODE SECTION 54956.9(d)(1) - CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION – Butte County Superior Court #23CV02789 - Ronald R Titus, as Trustee of the 2005 Titus Trust et al vs Vina Groundwater Sustainability Agency**
- 4.2 PURSUANT TO GOVERNMENT CODE SECTION 54956.9(d)(1) - CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION – Butte County Superior Court #22CV00321 - AquAlliance et al vs Vina Groundwater Sustainability Agency et al.**
- 4.3 PURSUANT TO GOVERNMENT CODE SECTION 54956.9(d)(1) - CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION – Butte County Superior Court #24CV04275 - AquAlliance et al vs Vina Groundwater Sustainability Agency et al.**

5. CLOSED SESSION ANNOUNCEMENT:

The Board emerged from closed session at 6:29 p.m. Direction was given, no was taken

6. ADJOURNMENT:

The Vina GSA Closed Session adjourned at 6:30 p.m. to a Vina GSA Regular Board Meeting on August 12, 2026, at 3:30 p.m. at the Chico City Council Chamber Building at 421 Main Street, Chico, CA and online via Zoom for viewing only.



Vina Groundwater Sustainability Agency Agenda Transmittal

Subject: Approval of Memorandum of Understanding (MOU) for Financial Services Between the Vina Groundwater Sustainability Agency and the Butte County Auditor-Controller

Contact: Dillon McGregor

Phone: (530) 552-3589

Meeting Date: August 12, 2026

Agenda Item: 3.2

BACKGROUND

Under Government Code Sections 25265 and 53060, the Vina Groundwater Sustainability Agency (GSA) is authorized to contract with the Butte County Auditor-Controller for financial and accounting services. As the GSA continues SGMA implementation activities, formalizing this arrangement through an MOU ensures consistent financial oversight, clear scope of services, and defined cost structure.

DISCUSSION

The MOU establishes a one-year agreement with the Butte County Auditor-Controller for two tiers of financial services, as detailed in Exhibit A:

- **Year End Accounting (\$1,200): Variance analysis and year-end accrual entries in compliance with GASB standards.**
- **Accounting without Grants (\$24,000): Standard financial recordkeeping including deposits, accounts receivable and payable, budget schedules, journal entries, quarterly financial reports to the Board, and audit support per Exhibit A.**

The not-to-exceed amount is \$26,000 for the initial one-year term, covering all labor, services, and expenses. The MOU may be renewed by mutual written agreement, with cost reviewed at least 90 days before renewal. Either party may terminate upon 60 days written notice. Grant accounting services are outside this scope and may be incorporated by written amendment when grant funds become available. The Accounting without Grants tier includes quarterly financial reports to the Board covering budget-to-actual comparisons, accounts receivable, accounts payable, and balance sheet summaries, providing ongoing financial visibility without additional GSA staff burden. This MOU was developed with input from the GSA Management Committee and has been reviewed by legal counsel and the Butte County Auditor-Controller's office.

FISCAL IMPACT

The not-to-exceed cost of \$26,000 is included in the adopted GSA operating budget.

ATTACHMENTS

1. Memorandum of Understanding for Financial Services Between the Vina Groundwater Sustainability Agency and the Butte County Auditor-Controller

REQUESTED ACTION

Approve the Memorandum of Understanding for Financial Services with the Butte County Auditor-Controller and authorize the Board Chair to execute the agreement on behalf of the Agency.

**MEMORANDUM OF UNDERSTANDING FOR THE PERFORMANCE OF FINANCIAL
SERVICES BETWEEN VINA GROUNDWATER SUSTAINABILITY AGENCY AND COUNTY OF
BUTTE AUDITOR-CONTROLLER**

This Memorandum of Understanding ("MOU") is made and entered into as of August 2026 (the "Effective Date"), by and between Vina Groundwater Sustainability Agency ("GSA"), a joint powers authority organized under California law, and the County of Butte Auditor-Controller ("County/AUD"), a political subdivision of the state of California, collectively referred to as the "Parties" and individually as a "Party."

Recitals

WHEREAS, Government Code Section 25265 provides that a county may contract with a special district to provide financial or accounting services for the district.

WHEREAS, Government Code Section 53060 states that the legislative body of a special district may contract with and employ any persons for the furnishing to the district special financial services and advice in financial, economic, accounting, engineering, legal or administrative matters if such persons are specially trained and experienced and competent to perform the special services required.

WHEREAS, the County currently provides certain accounting services to the GSA and the County has agreed to provide additional accounting services to the GSA, including year-end accounting services and grant accounting services.

WHEREAS, the purpose of this MOU is to establish the roles and responsibilities of the Parties in completing such services.

WHEREAS, the County Auditor-Controller currently provides certain financial and accounting services to the GSA and has agreed to provide additional financial and accounting services, including year-end accounting services, as further described in the scope of services attached to and made a part of this MOU as Exhibit A.

Agreement

1. Scope of Services

The County agrees to provide the GSA with the financial and accounting services described in the attached Exhibit A (the "Financial Services"). The Financial Services are limited to accounting, financial recordkeeping, and associated administrative activities as described in Exhibit A, and do not include program management services. The Financial Services provided under this MOU are separate and distinct from any other agreements between the Parties or their affiliated agencies. County shall provide all labor, services, equipment, tools, and supplies necessary to competently perform the Financial Services. County shall

determine the method, details, and means of completing the Financial Services in compliance with all applicable accounting standards and best practices.

2. Communication of Parties

Parties shall at all times maintain regular communication, including regular status meetings on the progress of the Financial Services contemplated under this MOU. Parties shall have a duty to communicate any information that is relevant to the Financial Services contemplated under this MOU to the other Party.

County shall participate in quarterly coordination meetings with GSA staff to review financial status, address questions, and support budget schedules and data importing for the subsequent fiscal year. Meeting timing shall be mutually agreed upon by the Parties, with preference for scheduling prior to the preparation of quarterly financial reports.

3. Payment for Services

a. The total annual fee for the Financial Services shall not exceed **\$26,000** for the initial one-year term. If the term of this MOU is extended as provided in Section 9 below, the parties will meet and confer at least 90 days before the end of the current term to determine the County's cost proposal for the upcoming year.

b. The total annual fee includes all of County's costs and expenses related to Financial Services. At the end of each month, County shall submit to GSA an invoice for the Services performed during the preceding month. The invoice shall include a brief description of the Financial Services performed, the dates of Financial Services, number of hours worked, payment due, and an itemization of any reimbursable expenditures. If the Financial Services are satisfactorily completed and the invoice is accurately computed, GSA shall pay the invoice within 30 days of its receipt.

c. The above not-to-exceed amount does not include services related to grant funding accounting, invoicing, and related services. If the GSA obtains future grants, it may request that the County provide grant-related services for any additional fee to be mutually agreed upon by the County and the GSA and memorialized in a written amendment.

4. Compliance with Laws

All actions contemplated in this MOU shall be performed in compliance with all applicable federal, state and local laws and regulations.

5. Confidentiality

Each Party shall treat any confidential information disclosed by the other Party during the course of this MOU as strictly confidential and shall not disclose such information without

prior written consent, except as may be required by applicable law, including, but not limited to, the California Public Records Act. If a third party demands disclosure of any confidential information from Parties, the party receiving the demand shall promptly inform the other party of it and Parties shall consult and mutually determine a response to the demand.

6. Indemnification

Each party shall indemnify, protect, and hold harmless the other party, and its officers, employees and agents (“Indemnitees”) from and against any claims, liability, losses, damages and expenses (including attorney, expert witness, and litigation costs) (collectively a “Claim”) arising out of or incidental to each party’s performance of any of its obligations under the provisions of this MOU. However, this indemnity provision will not apply to any Claim arising from the sole negligence or willful misconduct of a party or its employees or agents. The obligations under this indemnification provision shall survive the termination of this MOU.

7. Records

Parties shall keep and maintain all ledgers, books of account, invoices, vouchers, canceled checks, and other records and documents evidencing or relating to the Financial Services and invoice preparation and support for a minimum period of three years (or for any longer period required by law) from the date of final payment to County under this MOU. GSA may inspect and audit such books and records, including source documents, to verify all charges, payments and reimbursable costs under this MOU. In accordance with California Government Code section 8546.7, the Parties acknowledge that this MOU, and performance and payments under it, are subject to examination and audit by the California State Auditor for three years following final payment under the MOU.

8. Severability

If any provision of this MOU is found by any court or other legal authority, or is agreed upon by the Parties, to be in conflict with any law or regulation, then the conflicting provision shall be considered void, but the remainder of this MOU shall be severable and shall continue in full force and effect.

9. Term and Termination

a. This MOU shall become effective on the Effective Date and shall remain in effect for one year (the “Initial Term”).

b. The Initial Term may be extended for one or more “Renewal Terms” upon the GSA’s request and the County’s consent, subject to a written amendment signed by the parties in accordance with Section 11 below.

c. Either party may terminate this MOU during the Initial Term or any Renewal Term upon 60 days' written notice.

d. At the expiration of this MOU or any extension or earlier termination of it, County shall promptly provide all financial and other records related to the Financial Services. County also shall cooperate with the GSA to ensure that all pending Service requests are completed or promptly transitioned to any successor financial services provider designated by the GSA.

10. Entire Agreement

This MOU and any amendments to it constitute the entire MOU between the Parties concerning the subject matter hereof.

11. Amendments

This MOU may only be amended by a written document signed by the parties.

12. Approval of MOU

This MOU must be approved by the respective governing bodies of the GSA and the County prior to its execution by the Parties.

13. Counterparts

Parties agree that this MOU may be executed and delivered in counterparts which, when taken together, shall constitute a fully executed document. In addition, this MOU may be executed via electronic pdf transmission, and any such pdf signature shall be deemed to be an original signature.

Vina GSA:

County of Butte:

Jeff Rohwer
Board of Directors, Chair

Graciela C. Gutierrez
Auditor-Controller

Date

Date

Exhibit A

Scope of Work

The Butte County Office of the Auditor-Controller will perform the following standard financial recordkeeping services for the administration and operation of the Vina Groundwater Sustainability Agency. Grant administration services, if needed, will be scoped and priced separately and incorporated into this MOU by amendment when grant funds are available.

Year End Accounting

- Estimated Annual Cost \$1,200 (\$54.55 per hour)
- Description of Services: Variance analysis, preparation of year end accrual entries in compliance with GASB standards

Accounting without Grants

Estimated Annual Cost \$24,000 (\$37.26 per hour)

Description of Services: Business process configuration, creation and processing of all deposits, accounts receivable, accounts payable, budget schedules, creation and processing of journal entries in compliance with GASB standards. Contract expenditure tracking, including receipt of GSA-executed contracts and monitoring of payments against approved contract amounts to ensure expenditures do not exceed authorized contract values.

In support of the GSA's annual financial audit, County shall provide the following items to the GSA's third-party auditor as applicable:

- Copy of all bank account statements and investment statements
- Copy of monthly account reconciliations
- Copy of cash and investment policies
- Copy of check register
- Accounts receivable aging reports
- Accounts receivable aging reports subsequent to year end
- Copy of prepaid or inventory record
- List of capital assets with new acquisitions for the audit year
- Accounts payable aging reports
- Accounts payable aging reports subsequent to year end

- Trial balance
- New grant, contract, and debt agreements
- Organization chart
- Policies and procedures

County shall provide GSA with quarterly financial reports including budget-to-actual comparisons, accounts receivable, accounts payable, and balance sheet summaries. Reports shall be suitable for presentation to the GSA Board of Directors.

Accounting with Grants

Estimated Annual Cost \$34,000 (\$45.55 per hour)

Description of Financial Services: Business process configuration to meet grant reporting requirements; creation and processing of all deposits; accounts receivable, including grant revenues; accounts payable; budget schedules; creation and processing of journal entries in compliance with GASB standards; submission of grant reports to grantor agencies.

Note: Grant accounting financial services are outside the scope of this MOU and will be activated by amendment when grant funds become available. The cost listed above is an estimate and subject to negotiation at that time.



**Vina Groundwater
Sustainability Agency**

Board of Directors
August 12, 2026

Presented by Dillon McGregor, GSA Program Manager

Financial Services

Memorandum of Understanding

Vina GSA & Butte County Auditor-Controller

Background & Legal Authority

LEGAL AUTHORITY

Gov. Code § 25265

A county may contract with a special district to provide financial or accounting services.

Gov. Code § 53060

A special district may contract with qualified persons for financial, accounting, and administrative services.

WHY THIS MOU, WHY NOW

The Butte County Auditor-Controller currently serves as the GSA's banking and fund custodian, processing transactions through Workday.

As SGMA implementation activities continue, formalizing this relationship ensures consistent financial oversight.

The MOU establishes a defined scope of services, clear cost structure, and mutual accountability.

Quarterly financial reports to the Board will provide ongoing fiscal visibility without additional GSA staff burden.

MOU Scope of Services

Year End Accounting \$1,200 / year \$54.55 / hour • Variance analysis • Year-end accrual entries • GASB standards compliance	Accounting without Grants \$24,000 / year \$37.26 / hour • Deposits, A/R, A/P processing • Budget schedules & journal entries • Quarterly financial reports to Board • Third-party audit support (PBC list)	Grant Accounting TBD by amendment (if ever needed) Est. \$45.55 / hour • Activated when grant funds awarded • Cost negotiated at that time • Added via written MOU amendment • Grant reporting & submittal support
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Vina GSA | Financial Services MOU | August 12, 2026

Fiscal Impact & MOU Terms

FISCAL IMPACT

\$26,000 Not-to-exceed for initial one-year term • Includes all labor, services & expenses • Reflects combined cost of both service tiers • Cost reviewed 90 days before renewal • Included in the adopted GSA operating budget
--

MOU TERMS

Term	One year from effective date
Renewal	By mutual written agreement; cost reviewed 90 days prior
Termination	Either party upon 60 days written notice
Grant Services	Out of scope; added by written amendment when funds awarded
Invoicing	Monthly invoices with service description, dates, and hours worked
Approval Required	Governing bodies of both GSA and County must approve prior to execution

Vina GSA | Financial Services MOU | August 12, 2026

Recommended Action

Authorize the Board Chair to execute the Memorandum of Understanding for Financial Services Between the Vina Groundwater Sustainability Agency and the Butte County Auditor-Controller.

Reviewed By

GSA Management Committee
Legal Counsel
Butte County Auditor-Controller's Office

Not-to-Exceed Cost

\$26,000
Included in adopted FY 2026-27
GSA operating budget

Attachment

MOU for Financial Services
Between Vina GSA and
Butte County Auditor-Controller



Vina Groundwater Sustainability Agency Agenda Transmittal

Subject: Ongoing SGMA Implementation Support Services Request for Proposal (RFP) Update

Contact: Dillon McGregor

Phone: (530) 552-3589

Meeting Date: August 12, 2026

Agenda Item: 5.1

Summary

The Vina GSA issued RFP #26-01 for Ongoing SGMA Implementation Support Services on May 15, 2026. The RFP seeks a single, qualified consultant team to serve the GSA's technical and operational partner for SGMA implementation and GSA operations within the Vina Subbasin over the next implementation period (2027-2032). Services include SGMA compliance and annual reporting, groundwater and related monitoring, data management, governance and operational support, and stakeholder outreach. As the GSA transitions from grant-funded implementation to a fully agency-funded model, securing ongoing professional services support is a critical next step in meeting the GSA's long-term SGMA obligations.

The RFP was posted publicly through the Public Purchase procurement platform. One addendum was issued in response to questions received during the question period. Proposals are due July 31, 2026. A selection committee will evaluate proposals following the submission deadline. If interviews are conducted, they are anticipated to occur prior to the Board's next regular meeting on September 9, 2026.

Should the Board wish to have a member participate in the interview process, a designation would need to be made prior to that date. The Board may choose to designate an individual Board member or establish an ad hoc committee for this purpose.

Requested Action: Discuss potential Board participation in the interview process and, if desired, designate a Board member or ad hoc committee to participate.



Vina Groundwater Sustainability Agency Agenda Transmittal

Subject: Board Meeting Start Time

Contact: Dillon McGregor

Phone: (530) 552-3589

Meeting Date: August 12 2026

Agenda Item: 5.2

Summary:

At the July board meeting, the Board asked staff to bring back an item to reconsider the current 3:30 PM meeting start time. Meetings were previously held at 5:30 PM. Staff is seeking Board discussion on whether to keep the current time or move to a later start, such as 4:30 PM or 5:30 PM.

Requested Action: Discuss and provide direction to staff on the Board's preferred meeting start time.