

# Glenn Groundwater Authority

## Groundwater Sustainability Agency

225 N. Tehama Street, Willows, CA 95988 | 530.934.6540

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### Meeting of the Glenn Groundwater Authority Board of Directors

November 13, 2023 | 1:30 PM

225 North Tehama Street, Willows, CA 95988

Remote Public Participation Option:

Microsoft Teams meeting

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#### 1. CALL TO ORDER

The Chairperson will call the meeting to order and lead the [flag salute](#).

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#### 2. ROLL CALL

Roll call will be conducted.

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#### 3. APPROVAL OF MINUTES

- a. \*Approval of the meeting minutes from October 9, 2023.

Draft meeting minutes from the October 9, 2023 meeting are attached.

#### Attachments

- October 9, 2023 GGA Board meeting minutes

# Glenn Groundwater Authority

## Groundwater Sustainability Agency

225 North Tehama Street, Willows, CA 95988 | 530.934.6540

### Meeting Minutes

#### Glenn Groundwater Authority Board of Directors

October 9, 2023 | 1:30 p.m.

LOCATION: 225 North Tehama Street, Willows, CA 95988

Public participation was also offered via teleconference; accessible via telephone, computer, smartphone or tablet.

Director Members Present:	Alternate/2 <sup>nd</sup> Alternate Directors	Agency Representing:
X Grant Carmon	Tom Arnold	County of Glenn
X Bruce Roundy	R Pete Carr	City of Orland
	Ed Vonasek (2 <sup>nd</sup> )	City of Orland
X Gary Hansen (23/24 Chair)	R Evan Markey	City of Willows
Matt Deadmond	Michael Alves	Glide Water District
X John Amaro (23/24 Vice Chair)	Vacant	Glenn-Colusa Irrigation District
X Charles Schonauer	Emil Cavagnolo	Orland-Artois Water District
X Randy Hansen	Wade Danley	Kanawha Water District
Mark Lohse	Seth Fiack	Monroeville Water District
X Gary Enos	Lance Boyd	Princeton-Codora-Glenn Irrigation District/ Provident Irrigation District

Directors attending remotely are designated with "R" and are not counted toward a quorum, do not vote, and are considered members of the public.

Others in attendance:

Lisa Hunter (GGA/Glenn County), Kaitlyn Murray (GGA/Glenn County), Valerie Kincaid (GGA Counsel), Jenny Scheer (Water and Land Solutions), Ryan Fulton (Larry Walker Associates), Pati Nolen, Bill Davis, Brandon Davison, Pete Dennehy (Montgomery & Associates), Joe Turner (Geosyntec)

#### 1. CALL TO ORDER

- Chairman Hansen called the meeting to order at 1:31 p.m. and the pledge of allegiance was recited.

#### 2. ROLL CALL

- Roll call was taken as indicated above.

#### 3. APPROVAL OF MINUTES

- \*Approval of the special meeting minutes from July 26, 2023.
  - \*Approval of the meeting minutes from August 14, 2023.
  - \*Approval of the meeting minutes from September 12, 2023.
- Chairman Hansen invited comments or revisions on the aforementioned meeting minutes. No comments were heard.

**On motion by Director Carmon, seconded by Director Enos the meeting minutes of the July 26, 2023 meeting, the August 14, 2023 meeting and the September 12, 2023 meeting were unanimously approved as presented.**

#### 4. PERIOD OF PUBLIC COMMENT

- Chairman Hansen invited public comments; whereby, no public comments were heard.

#### 5. STAFF UPDATES

- Lisa Hunter stated four Well Permit Acknowledgement Forms have been received since September 13, 2023.
- Ms. Hunter stated in regards to the WaterSMART grant applications for the Colusa Subbasin, she met with Carol Thomas-Keefer from Colusa Groundwater Authority (CGA) and it was determined the deadline was too soon to submit an application for this round. She stated they are continuing to evaluate the necessary tasks with the Technical Advisory Committee (TAC) with plans to submit an application for the next round occurring in the Spring.
- Ms. Hunter stated she contacted Davids Engineering regarding the on-call support services and confirmed they are willing to assist with scheduling of tasks through the five-year update and items to prepare for the grant applications. She further stated a few other firms are interested in providing on-call services and she will be bringing back draft agreements to a future meeting.
- Ms. Hunter stated she will be sending an email to member agencies to submit any nominations for the vacant seat on the TAC. She stated she received a letter of interest from Shasta Banchio with Glenn-Colusa Irrigation District (GCID).

#### 6. FINANCIAL REPORT

- a. \*Review and accept Monthly Activities Report.
- b. \*Review and consider approval of claims.

- Chairman Hansen invited comments or questions; whereby, none were heard.

**On motion by Director Amaro, seconded by Director Schonauer, it was unanimously ordered to approve the Monthly Activities Report as presented.**

**On motion by Director Schonauer, seconded by Director Carmon, it was unanimously ordered to approve the claims as presented.**

#### 7. LETTERS OF SUPPORT

- a. \*Consider approval of Letter of Support for USBR WaterSMART Applied Science Grant Application for Reclamation District No. 108, Colusa County Water District, and Dunnigan Water District Groundwater Recharge Data Sharing and Modeling Improvements Project.
  - b. \*Consider approval of Letter of Support for USBR WaterSMART Planning and Project Design Grant Application for Orland-Artois Water District's Infrastructure Expansion Project: Planning & Design Phase.
  - c. \*Consider approval of Letter of Support for USBR WaterSMART Drought Resiliency Grant Application for Orland-Artois Water District's Infrastructure Expansion Project: Implementation / Construction Phase.
- Ms. Hunter stated since the Colusa Subbasin GSAs are not applying for these grants, the GGA is not in competition for these grant funds. Furthermore, each of these applications is part of a different funding opportunity and so the applications are not competing for the same funds.
  - Ryan Fulton from Larry Walker and Associates spoke regarding Item 7.a stating the three districts are applying for the WaterSMART Applied Science Grant for a groundwater data sharing and modeling project. He stated the goal is to collect and format the data received and distribute to GSAs for collaboration.

- There was some discussion on how much funding was available for the WaterSMART grants.

**On motion by Director Roundy, seconded by Director Enos it was unanimously ordered to approve the Letter of Support for USBR WaterSMART Applied Science Grant Application for Reclamation District No. 108, Colusa County Water District, and Dunnigan Water District Groundwater Recharge Data Sharing and Modeling Improvements Project.**

**On motion by Director Carmon, seconded by Director Randy Hansen, it was unanimously ordered to approve the Letter of Support for USBR WaterSMART Planning and Project Design Grant Application for Orland-Artois Water District's Infrastructure Expansion Project: Planning & Design Phase.**

**On motion by Director Amaro, seconded by Director Roundy, it was unanimously ordered to approve the Letter of Support for USBR WaterSMART Drought Resiliency Grant Application for Orland-Artois Water District's Infrastructure Expansion Project: Implementation / Construction Phase.**

8. COLUSA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN IMPLEMENTATION

- a. Receive an update on Colusa Subbasin Groundwater Sustainability Plan implementation activities.

- Ms. Hunter stated there was nothing additional to report at this time.

9. GGA GROUNDWATER RECHARGE SERVICES

- a. Receive an update on groundwater recharge services and pilot project implementation activities.
- b. Receive an update on outreach/press event showcasing groundwater recharge pilot projects scheduled for October 11, 2023.

- Ms. Hunter stated the outreach/press event will be held on October 11, 2023 at 11:00 a.m. She stated there will be GGA members (also representing their respective partner agency) in attendance to say a few words and answer any questions that may arise. A Press Release will be issued October 11 inviting the media and interested parties to attend. She presented a picture collage that will be present at the event, showing recharge sites throughout the GGA area. Jenny Scheer presented two informational signs that will be posted at the site. One of the signs will be more permanent as it shows the process of recharge which occurs throughout the year at Lely Park. It was noted Geosyntec designed the signs and the City of Orland will do the installation. Discussion ensued on the benefits and logistics of the event.

10. COMMITTEE UPDATES

- a. Executive Committee
  - i. CGA/GGA Joint Executive Committee
- b. Fee Study Ad Hoc Committee
- c. Groundwater Recharge Pilot Project Ad Hoc Committee
- d. Technical Advisory Committee

- Committee updates were included in the meeting packet; no additional committee updates were heard.

11. CLOSED SESSION

Gov't Code §54956.9 – Conference with Legal Counsel – Anticipated or significant exposure to litigation regarding tax refund claims and challenges to previously adopted property related fees.

## 12. CLOSED SESSION

Gov't Code §54956.9 – Conference with Legal Counsel – Existing Litigation  
Aqualliance, California Water Impact Network, and California Sportfishing Alliance vs. Colusa Groundwater Authority, Glenn Groundwater Authority  
Colusa County Superior Court - Case Number CV24584

- No public comments were presented or heard for Items 11 or 12.
- The Board adjourned to closed session at 1:56 p.m.

## 13. REPORT OUT FROM CLOSED SESSION

- The Board returned from closed session at 2:25 p.m.
- Chairman Hansen stated there were no reportable actions for Items 11 and 12.

## 14. MEMBER REPORTS AND COMMENTS

- Chairman Hansen invited member reports or comments; whereby, none were heard.

## 15. NEXT MEETING

- The next regular scheduled meeting is on November 13, 2023 at 1:30 p.m.

## 16. ADJOURN

- The meeting was adjourned at 2:26 p.m.

#### **4. PERIOD OF PUBLIC COMMENT**

Members of the public are encouraged to address the GGA Board of Directors on items relevant to the GGA. Public comments are limited to no more than 5 minutes. No action may be taken on public comments.

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#### **5. STAFF UPDATES**

The program manager will provide brief status updates. Reminders and/or clarifications may also be made at this time.

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#### **6. FINANCIAL REPORT**

- a. \*Review and accept Monthly Activities Report.
- b. \*Review and consider approval of claims.

The Balance Sheets, Budget to Actuals, Transaction Listings, and Claims Summary are attached.

##### **Attachments**

- Balance Sheet (September 2023)
- Budget to Actuals (September 2023)
- Transaction Listing (September 2023)
- Draft Balance Sheet (October 2023)
- Draft Budget to Actuals (October 2023)
- Draft Transaction Listing (October 2023)
- Claims Summary

**COUNTY OF GLENN  
General Ledger Summary  
Balance Sheet Accounts  
For the Period Ending:  
Sep 30, 2023**

**Organization Key: 04796000 - GLENN GROUNDWATER AUTHORITY**

Object Type	Object Group Description	Object Code	Balance
<b>ASSETS</b>			
	<b>CURRENT ASSETS</b>		
		00100 - CASH IN TREASURY	1,406,506.50
	<b>CURRENT ASSETS - Summary</b>		<b>\$1,406,506.50</b>
<b>AS - Summary</b>			<b>\$1,406,506.50</b>
<b>FUND EQUITY</b>			
	<b>FUND EQUITY</b>		
		00974 - UNRESERVED RETAINED EARNINGS	1,420,718.19
	<b>FUND EQUITY - Summary</b>		<b>\$1,420,718.19</b>
<b>FB - Summary</b>			<b>\$1,420,718.19</b>

**COUNTY OF GLENN**  
**General Ledger Summary**  
**Budget to Actuals**  
**For the period Ending:**  
**Sep 30, 2023**

Organization Key	Object Type	Object Group Description	Object Code	Current Year Budget	Current Year Actuals	Remaining Budget	% of Budget Used
<b>04796000 - GLENN GROUNDWATER AUTHORITY</b>							
<b>REVENUES</b>							
<b>FINES, FORFEITURES &amp; PENALTIES</b>							
			37320 PENALTIES/COST DELQ TAXES	0.00	0.00	0.00	0.00%
<b>FINES, FORFEITURES &amp; PENALTIES - Summary</b>				<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>/0</b>
<b>USE OF MONEY &amp; PROPERTY</b>							
			44300 INTEREST	5,000.00	1,523.74	3,476.26	30.47%
<b>USE OF MONEY &amp; PROPERTY - Summary</b>				<b>\$5,000.00</b>	<b>\$1,523.74</b>	<b>\$3,476.26</b>	<b>30.47%</b>
<b>INTERGOVERNMENTAL REVENUE</b>							
			56200 OTHER GOVT AGENCIES	0.00	0.00	0.00	0.00%
<b>INTERGOVERNMENTAL REVENUE - Summary</b>				<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>/0</b>
<b>CHARGES FOR CURRENT SERVICES</b>							
			61152 SPECIAL ASSESSMENT	575,372.00	0.00	575,372.00	0.00%
<b>CHARGES FOR CURRENT SERVICES - Summary</b>				<b>\$575,372.00</b>	<b>\$0.00</b>	<b>\$575,372.00</b>	<b>0.00%</b>
<b>MISCELLANEOUS REVENUES</b>							
			74121 A-87 COST ALLOC REBATE	7,949.00	1,987.26	5,961.74	25.00%
<b>MISCELLANEOUS REVENUES - Summary</b>				<b>\$7,949.00</b>	<b>\$1,987.26</b>	<b>\$5,961.74</b>	<b>25.00%</b>
<b>RV - Summary</b>				<b>\$588,321.00</b>	<b>\$3,511.00</b>	<b>\$584,810.00</b>	<b>0.60%</b>
<b>EXPENDITURES</b>							
<b>SERVICES &amp; SUPPLIES</b>							
			03150 INSURANCE	2,000.00	1,734.00	266.00	86.70%
			03220 OFFICE EXPENSE	2,000.00	0.00	2,000.00	0.00%
			03230 PROFESSIONAL SERVICES	678,125.00	13,156.49	664,968.51	1.94%



**COUNTY OF GLENN**  
**General Ledger Summary**  
**Budget to Actuals**  
**For the period Ending:**  
**Sep 30, 2023**

Organization Key	Object Type	Object Group Description	Object Code	Current Year Budget	Current Year Actuals	Remaining Budget	% of Budget Used
			03280 SPECIAL DEPT EXPENSE	26,000.00	2,832.20	23,167.80	10.89%
		<b>SERVICES &amp; SUPPLIES - Summary</b>		<b>\$708,125.00</b>	<b>\$17,722.69</b>	<b>\$690,402.31</b>	<b>2.50%</b>
		<b>OTHER CHARGES</b>					
			05700 ADMINISTRATIVE EXPENSE	7,500.00	0.00	7,500.00	0.00%
			05730 A-87 COST ALLOCATION	0.00	0.00	0.00	0.00%
		<b>OTHER CHARGES - Summary</b>		<b>\$7,500.00</b>	<b>\$0.00</b>	<b>\$7,500.00</b>	<b>0.00%</b>
		<b>CONTINGENCY</b>					
			09900 CONTINGENCY	65,400.00	0.00	65,400.00	0.00%
		<b>CONTINGENCY - Summary</b>		<b>\$65,400.00</b>	<b>\$0.00</b>	<b>\$65,400.00</b>	<b>0.00%</b>
	<b>XP - Summary</b>			<b>\$781,025.00</b>	<b>\$17,722.69</b>	<b>\$763,302.31</b>	<b>2.27%</b>
<b>Net Return/ (Cost)</b>				<b>(\$192,704.00)</b>	<b>(\$14,211.69)</b>	<b>(\$178,492.31)</b>	<b>2.27%</b>

SORT ORDER: SUB-SUB within ORG KEY

SELECT ORGANIZATION KEY: 04796000

Lg	UNIQUE ACCOUNT	Primary Ref	Transaction Description	SS Ref	Date	Job No	Debit	Credit	NET		
GL	04796000-00100	JE240912	AutoID: JE004130 Job: 2326761	JE	09/01/23	02326761	662.42	0.00	662.42		
GL	04796000-00100	JE240913	AutoID: JE004132 Job: 2326847	JE	09/01/23	02326847	662.42	0.00	1,324.84		
GL	04796000-00100	JE240914	AutoID: JE004133 Job: 2326925	JE	09/01/23	02326925	662.42	0.00	1,987.26		
GL	04796000-00100	TTLOH	AutoID:Total Job:2295515	OH	09/27/23	02295515	0.00	809.20	1,178.06		
GL	04796000-00100	TTLOH	AutoID:Total Job:2303553	OH	09/29/23	02303553	0.00	31,342.22	-30,164.16		
GL	04796000-00100	JE240971	AutoID: JE004136 Job: 2328895	JE	09/30/23	02328895	1,523.74	0.00	-28,640.42		
*****Total *SUBS 00100							CASH IN TREASURY	DR	3,511.00	32,151.42	-28,640.42
GL	04796000-00670	TTLOH	AutoID:OH010949 Job:2295288	OH	09/27/23	02295288	0.00	809.20	809.20		
GL	04796000-00670	TTLOH	AutoID:Total Job:2295515	OH	09/27/23	02295515	809.20	0.00	0.00		
GL	04796000-00670	TTLOH	AutoID:OH010930 Job:2302779	OH	09/29/23	02302779	0.00	31,342.22	31,342.22		
GL	04796000-00670	TTLOH	AutoID:Total Job:2303553	OH	09/29/23	02303553	31,342.22	0.00	0.00		
*****Total *SUBS 00670							CHECKS PAYABLE	CR	32,151.42	32,151.42	0.00
GL	04796000-00675	40252 GGA	LUHDORFF AND SC A#221096 LUHDO	OH	09/29/23	02302779	18,498.23	0.00	-18,498.23		
*****Total *SUBS 00675							ACCOUNTS PAYABLE	CR	18,498.23	0.00	-18,498.23
GL	04796000-03230	2256 GGA	PARIS KINCAID W A#1850 PARIS K	OH	09/29/23	02302779	5,110.00	0.00	5,110.00		
GL	04796000-03230	40252 GGA	LUHDORFF AND SC A#221096 LUHDO	OH	09/29/23	02302779	1,804.52	0.00	6,914.52		
GL	04796000-03230	522069 GGA	GEOSYNTEC CONSU A#SFO145 GEOSY	OH	09/29/23	02302779	5,929.47	0.00	12,843.99		
*****Total *SUBS 03230							PROFESSIONAL SERVICES	DR	12,843.99	0.00	12,843.99
GL	04796000-03280	092223 GGA	ORLAND UNIT WAT 09/22/23 OUWUA	OH	09/27/23	02295288	809.20	0.00	809.20		
*****Total *SUBS 03280							SPECIAL DEPT EXPENSE	DR	809.20	0.00	809.20
GL	04796000-44300	JE240971	09/2023 INTEREST APPORTIONMENT	JE	09/30/23	02328895	0.00	1,523.74	1,523.74		
*****Total *SUBS 44300							INTEREST	CR	0.00	1,523.74	1,523.74
GL	04796000-74121	JE240912	07/2023 A-87 COST ALLOC	JE	09/01/23	02326761	0.00	662.42	662.42		
GL	04796000-74121	JE240913	08/2023 A-87 COST ALLOC	JE	09/01/23	02326847	0.00	662.42	1,324.84		
GL	04796000-74121	JE240914	09/2023 A-87 COST ALLOC	JE	09/01/23	02326925	0.00	662.42	1,987.26		
*****Total *SUBS 74121							A-87 COST ALLOC REBATE	CR	0.00	1,987.26	1,987.26
*****Total *KEY 04796000							GLENN GROUNDWATER AUTHORITY	DR-CR	67,813.84	67,813.84	0.00
						** GRAND TOTAL **	DR-CR	67,813.84	67,813.84	0.00	

**COUNTY OF GLENN  
General Ledger Summary  
Balance Sheet Accounts  
For the Period Ending:  
Oct 31, 2023**

**Organization Key: 04796000 - GLENN GROUNDWATER AUTHORITY**

Object Type	Object Group Description	Object Code	Balance
<b>ASSETS</b>			
	<b>CURRENT ASSETS</b>		
		00100 - CASH IN TREASURY	1,393,550.02
	<b>CURRENT ASSETS - Summary</b>		<b>\$1,393,550.02</b>
<b>AS - Summary</b>			<b>\$1,393,550.02</b>
<b>FUND EQUITY</b>			
	<b>FUND EQUITY</b>		
		00974 - UNRESERVED RETAINED EARNINGS	1,228,014.19
	<b>FUND EQUITY - Summary</b>		<b>\$1,228,014.19</b>
	<b>BUDGETARY ACCOUNTS</b>		
		00997 - ESTIMATED REVENUES	(588,321.00)
		00999 - APPROPRIATIONS	781,025.00
	<b>BUDGETARY ACCOUNTS - Summary</b>		<b>\$192,704.00</b>
<b>FB - Summary</b>			<b>\$1,420,718.19</b>

**COUNTY OF GLENN**  
**General Ledger Summary**  
**Budget to Actuals**  
**For the period Ending:**  
**Oct 31, 2023**

Organization Key	Object Type	Object Group Description	Object Code	Current Year Budget	Current Year Actuals	Remaining Budget	% of Budget Used
<b>04796000 - GLENN GROUNDWATER AUTHORITY</b>							
<b>REVENUES</b>							
<b>FINES, FORFEITURES &amp; PENALTIES</b>							
			37320 PENALTIES/COST DELQ TAXES	0.00	0.00	0.00	0.00%
<b>FINES, FORFEITURES &amp; PENALTIES - Summary</b>				<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>/0</b>
<b>USE OF MONEY &amp; PROPERTY</b>							
			44300 INTEREST	5,000.00	1,523.74	3,476.26	30.47%
<b>USE OF MONEY &amp; PROPERTY - Summary</b>				<b>\$5,000.00</b>	<b>\$1,523.74</b>	<b>\$3,476.26</b>	<b>30.47%</b>
<b>INTERGOVERNMENTAL REVENUE</b>							
			56200 OTHER GOVT AGENCIES	0.00	0.00	0.00	0.00%
<b>INTERGOVERNMENTAL REVENUE - Summary</b>				<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>/0</b>
<b>CHARGES FOR CURRENT SERVICES</b>							
			61152 SPECIAL ASSESSMENT	575,372.00	0.00	575,372.00	0.00%
<b>CHARGES FOR CURRENT SERVICES - Summary</b>				<b>\$575,372.00</b>	<b>\$0.00</b>	<b>\$575,372.00</b>	<b>0.00%</b>
<b>MISCELLANEOUS REVENUES</b>							
			74121 A-87 COST ALLOC REBATE	7,949.00	2,649.68	5,299.32	33.33%
<b>MISCELLANEOUS REVENUES - Summary</b>				<b>\$7,949.00</b>	<b>\$2,649.68</b>	<b>\$5,299.32</b>	<b>33.33%</b>
<b>RV - Summary</b>				<b>\$588,321.00</b>	<b>\$4,173.42</b>	<b>\$584,147.58</b>	<b>0.71%</b>
<b>EXPENDITURES</b>							
<b>SERVICES &amp; SUPPLIES</b>							
			03150 INSURANCE	2,000.00	1,734.00	266.00	86.70%
			03220 OFFICE EXPENSE	2,000.00	0.00	2,000.00	0.00%
			03230 PROFESSIONAL SERVICES	678,125.00	26,775.39	651,349.61	3.95%

**COUNTY OF GLENN**  
**General Ledger Summary**  
**Budget to Actuals**  
**For the period Ending:**  
**Oct 31, 2023**

Organization Key	Object Type	Object Group Description	Object Code	Current Year Budget	Current Year Actuals	Remaining Budget	% of Budget Used
			03280 SPECIAL DEPT EXPENSE	26,000.00	2,832.20	23,167.80	10.89%
		<b>SERVICES &amp; SUPPLIES - Summary</b>		<b>\$708,125.00</b>	<b>\$31,341.59</b>	<b>\$676,783.41</b>	<b>4.43%</b>
		<b>OTHER CHARGES</b>					
			05700 ADMINISTRATIVE EXPENSE	7,500.00	0.00	7,500.00	0.00%
			05730 A-87 COST ALLOCATION	0.00	0.00	0.00	0.00%
		<b>OTHER CHARGES - Summary</b>		<b>\$7,500.00</b>	<b>\$0.00</b>	<b>\$7,500.00</b>	<b>0.00%</b>
		<b>CONTINGENCY</b>					
			09900 CONTINGENCY	65,400.00	0.00	65,400.00	0.00%
		<b>CONTINGENCY - Summary</b>		<b>\$65,400.00</b>	<b>\$0.00</b>	<b>\$65,400.00</b>	<b>0.00%</b>
	<b>XP - Summary</b>			<b>\$781,025.00</b>	<b>\$31,341.59</b>	<b>\$749,683.41</b>	<b>4.01%</b>
<b>Net Return/ (Cost)</b>				<b>(\$192,704.00)</b>	<b>(\$27,168.17)</b>	<b>(\$165,535.83)</b>	<b>4.01%</b>

SORT ORDER: SUB-SUB within ORG KEY

SELECT ORGANIZATION KEY: 04796000

Lg	UNIQUE ACCOUNT	Primary Ref	Transaction Description	SS Ref Date	Job No	Debit	Credit	NET
GL	04796000-00100	JE241115	AutoID: JE004157 Job: 2346356	JE 10/01/23	02346356	662.42	0.00	662.42
GL	04796000-00100	TTLOH	AutoID:Total Job:2356589	OH 10/27/23	02356589	0.00	13,618.90	-12,956.48
*****Total	*SUBS 00100		CASH IN TREASURY		DR	662.42	13,618.90	-12,956.48
GL	04796000-00670	TTLOH	AutoID:OH011045 Job:2356571	OH 10/27/23	02356571	0.00	13,618.90	13,618.90
GL	04796000-00670	TTLOH	AutoID:Total Job:2356589	OH 10/27/23	02356589	13,618.90	0.00	0.00
*****Total	*SUBS 00670		CHECKS PAYABLE		CR	13,618.90	13,618.90	0.00
GL	04796000-00974	JE241178	SET UP 2023-24 APPROPRIATIONS	JE 10/01/23	02356852	781,025.00	0.00	-781,025.00
GL	04796000-00974	JE241178	SET UP 2023-24 ESTIMATED REV	JE 10/01/23	02356852	0.00	588,321.00	-192,704.00
*****Total	*SUBS 00974		UNRESERVED RETAINED EARNINGS		CR	781,025.00	588,321.00	-192,704.00
GL	04796000-00997	JE241178	SET UP 2023-24 ESTIMATED REV	JE 10/01/23	02356852	588,321.00	0.00	-588,321.00
*****Total	*SUBS 00997		ESTIMATED REVENUES		CR	588,321.00	0.00	-588,321.00
GL	04796000-00999	JE241178	SET UP 2023-24 APPROPRIATIONS	JE 10/01/23	02356852	0.00	781,025.00	781,025.00
*****Total	*SUBS 00999		APPROPRIATIONS		CR	0.00	781,025.00	781,025.00
GL	04796000-03230	103343 GGA	PROVOST AND PRI A#02871-21-001	OH 10/27/23	02356571	1,425.00	0.00	1,425.00
GL	04796000-03230	2286 GGA	PARIS KINCAID W A# 1850 Paris	OH 10/27/23	02356571	1,934.50	0.00	3,359.50
GL	04796000-03230	2302 GGA	PARIS KINCAID W A#1851 PARIS K	OH 10/27/23	02356571	535.50	0.00	3,895.00
GL	04796000-03230	3865222 GGA	CLIFTON LARSON A# A246683 CLA	OH 10/27/23	02356571	500.00	0.00	4,395.00
GL	04796000-03230	526712 GGA	GEOSYNTEC CONSU A#SF0145 GEOSY	OH 10/27/23	02356571	9,223.90	0.00	13,618.90
*****Total	*SUBS 03230		PROFESSIONAL SERVICES		DR	13,618.90	0.00	13,618.90
GL	04796000-74121	JE241115	10/2023 A-87 COST ALLOC	JE 10/01/23	02346356	0.00	662.42	662.42
*****Total	*SUBS 74121		A-87 COST ALLOC REBATE		CR	0.00	662.42	662.42
*****Total	*KEY 04796000		GLENN GROUNDWATER AUTHORITY		DR-CR	1,397,246.22	1,397,246.22	0.00
			** G R A N D T O T A L **		DR-CR	1,397,246.22	1,397,246.22	0.00

# Claims Summary

Glenn Groundwater Authority

Invoices to be paid

Meeting Date: **November 13, 2023**

Invoice Date	Invoice Number	Description	Amount
		Provost & Pritchard Consulting Group (Direct Charge	
10/10/2023	104127	Preparation)	\$ 212.50
10/1/2023	2311	Paris Kincaid Wasiewski, LLP; Matter #1850	\$ 1,337.00
10/9/2023	529399	Geosyntec Consultants (GW Recharge Services)	\$ 3,574.88
11/1/2023	2358	Paris Kincaid Wasiewski, LLP; Matter #1850	\$ 3,577.00
11/10/2023	23-WR-04	Glenn County- Admin Support (Jul-Sep 2023)	\$ 28,597.55
<b>Total</b>			<b>\$ 37,298.93</b>

## **7. \*APPROVE 2024 MEETING SCHEDULE**

The Board generally meets the 2nd Monday of each month at 1:30 p.m. The 2024 draft meeting schedule is attached. Potential conflicts are noted for consideration, in particular the standing conflict with the Northern California Water Association's (NCWA) Groundwater Management Task Force meetings. The task force meets quarterly and provides an opportunity for regional collaboration and updates.

### **Attachments**

- Draft 2024 Meeting Schedule



# Glenn Groundwater Authority Board of Directors 2024 Meeting Schedule

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*The GGA Board of Directors will meet generally on the 2<sup>nd</sup> **Monday** of each month at 1:30 p.m. Meetings will be held at the Glenn County Planning and Community Development Services Agency located at 225 North Tehama Street, Willows, CA 95988. Exceptions are noted below.*

- January 8, 2024
- February 12, 2024
- March 12, 2024 (March 11 meeting conflict)
- April 8, 2024
- May 13, 2024
- June 11, 2024 (June 10 meeting conflict)
- July 8, 2024
- August 12, 2024
- September 10, 2024 (September 9 meeting conflict)
- October 14, 2024
- November 11, 2024
- December 10, 2024 (December 9 meeting conflict)

Draft 11/13/23

## 8. COLUSA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN (GSP) DETERMINATION

- a. Overview of Colusa Subbasin GSP “incomplete” determination.

On October 26, 2023, the Department of Water Resources (DWR) determined the Colusa Subbasin GSP to be “incomplete” The GSAs have 180 days to address the deficiencies and resubmit the GSP for evaluation no later than April 23, 2024.

On October 30, 2023, DWR released it’s a guidance document titled [Groundwater Sustainability Plan Implementation: A guide to Annual Reports, Periodic Evaluations, and Plan Amendments](#) and a [Frequently Asked Questions \(FAQ\) and Available Resources](#) document. A document from January 2022 provides FAQs on incomplete determinations (attached).

### Attachments

- Colusa Subbasin GSP Determination Letter
- DWR’s Incomplete Determinations & Next Steps Frequently Asked Questions (January 2022)



CALIFORNIA DEPARTMENT OF WATER RESOURCES

# SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

715 P Street, 8<sup>th</sup> Floor | Sacramento, CA 95814 | P.O. Box 942836 | Sacramento, CA 94236-0001

October 26, 2023

Lisa Hunter  
County of Glenn Groundwater Sustainability Agency - Corning  
225 North Tehama Street  
Willows, CA 95988  
[lhunter@countyofglenn.net](mailto:lhunter@countyofglenn.net)

RE: Sacramento Valley – Colusa Subbasin - 2022 Groundwater Sustainability Plan

Dear Lisa Hunter,

The Department of Water Resources (Department) has evaluated the groundwater sustainability plan (GSP or Plan) submitted for the Sacramento Valley – Colusa Subbasin. The Department has determined that the Plan is “incomplete” pursuant to Section 355.2(e)(2) of the GSP Regulations.

The Department based its incomplete determination on recommendations from the Staff Report, included as an enclosure to the attached Statement of Findings, which describes that the Subbasin’s Plan does not satisfy the objectives of the Sustainable Groundwater Management Act (SGMA) nor substantially comply with the GSP Regulations. The Staff Report also provides corrective actions which the Department recommends the Subbasin’s groundwater sustainability agencies (GSAs) review while determining how to address the deficiencies.

The Subbasin’s GSAs have 180 days, the maximum allowed by the GSP Regulations, to address the identified deficiencies. Where addressing the deficiencies requires modification of the Plan, the GSAs must adopt those modifications into their respective GSPs and all applicable coordination agreement materials, or otherwise demonstrate that those modifications are part of the Plan before resubmitting it to the Department for evaluation no later than April 23, 2024. The Department understands that much work has occurred to advance sustainable groundwater management since the GSAs submitted their GSPs in January 2022. To the extent to which those efforts are related or responsive to the Department’s identified deficiencies, we encourage you to document that as part of your Plan resubmittal. The Department prepared a [Frequently Asked Questions](#) document to provide general information and guidance on the process of addressing deficiencies in an “incomplete” determination.


Department staff will work expeditiously to review the revised components of your Plan resubmittal. If the revisions sufficiently address the identified deficiencies, the Department will determine that the Plan is “approved”. In that scenario, Department staff will identify additional recommended corrective actions that the GSAs should address

early in implementing their GSPs (i.e., no later than the first required periodic evaluation). Among other items, those corrective actions will recommend the GSAs provide more detail on their plans and schedules to address data gaps. Those recommendations will call for significantly expanded documentation of the plans and schedules to implement specific projects and management actions. Regardless of those recommended corrective actions, the Department expects the first periodic evaluations, required no later than January 2027 – one-quarter of the way through the 20-year implementation period – to document significant progress toward achieving sustainable groundwater management.

If the Subbasin's GSAs cannot address the deficiencies identified in this letter by April 23, 2024, then the Department, after consultation with the State Water Resources Control Board, will determine the GSP to be "inadequate". In that scenario, the State Water Resources Control Board may identify additional deficiencies that the GSAs would need to address in the state intervention processes outlined in SGMA.

Please contact Sustainable Groundwater Management staff by emailing [sgmps@water.ca.gov](mailto:sgmps@water.ca.gov) if you have any questions related to the Department's assessment or implementation of your GSP.

Thank You,

  
\_\_\_\_\_  
Paul Gosselin  
Deputy Director  
Sustainable Groundwater Management

Attachment:

1. Statement of Findings Regarding the Determination of Incomplete Status of the Sacramento Valley – Colusa Subbasin Groundwater Sustainability Plan

**STATE OF CALIFORNIA  
DEPARTMENT OF WATER RESOURCES**

**STATEMENT OF FINDINGS REGARDING THE  
DETERMINATION OF INCOMPLETE STATUS OF THE  
SACRAMENTO VALLEY – COLUSA SUBBASIN  
GROUNDWATER SUSTAINABILITY PLAN**

The Department of Water Resources (Department) is required to evaluate whether a submitted groundwater sustainability plan (GSP or Plan) conforms to specific requirements of the Sustainable Groundwater Management Act (SGMA or Act), is likely to achieve the sustainability goal for the Subbasin, and whether the GSP adversely affects the ability of an adjacent basin or subbasin to implement its GSP or impedes achievement of sustainability goals in an adjacent basin or subbasin. (Water Code § 10733.) The Department is directed to issue an assessment of the GSP within two years of its submission. (Water Code § 10733.4.) This Statement of Findings explains the Department's decision regarding the submitted Plan by the Colusa Groundwater Authority Groundwater Sustainability Agency and Glenn Groundwater Authority Groundwater Sustainability Agency (GSAs or Agencies) for the Sacramento Valley – Colusa Subbasin (Subbasin) (Basin No. 5-021.52).

Department management has reviewed the enclosed Staff Report, which recommends that the identified deficiencies should preclude approval of the GSP. Based on its review of the Staff Report, Department management is satisfied that staff have conducted a thorough evaluation and assessment of the Plan and concurs with, and hereby adopts, staff's recommendation and all the corrective actions provided. The Department thus deems the Plan incomplete based on the Staff Report and the findings contained herein. In particular, the Department finds:

- A. The GSAs should revise the GSP to provide a reasonable assessment of overdraft conditions using the best available information and describe a reasonable means to mitigate overdraft. Specifically, the Plan must be amended as follows:
  1. Reevaluate the assessment of overdraft conditions in the Subbasin. Specifically, the GSAs should examine the assumptions that were used to develop the current overdraft and the projected overdraft estimates in the projected water budget considering the results vary greatly from the values reported in the recent annual report data. The assessment should include the latest information for the Subbasin to ensure the GSP includes the required projects and management actions to mitigate overdraft in the Subbasin.

2. Develop and describe a reasonable means to mitigate the overdraft that is continuing to occur in the Subbasin. Specifically, the GSAs should describe proposed management actions that are commensurate with the level of understanding of groundwater conditions in the Subbasin and provide sufficient details for Department staff to be able to clearly understand how the Plan's projects and management actions will mitigate overdraft in the Subbasin under different climate scenarios.
- B. The GSAs must provide a more detailed explanation and justification regarding the selection of the sustainable management criteria for groundwater levels, particularly minimum thresholds and measurable objectives, and quantitatively describe the effects of those criteria on the interests of beneficial uses and users of groundwater. Department staff recommend the GSAs consider and address the following:
1. Refine the description of undesirable results to clearly describe the significant and unreasonable conditions the GSAs are managing the Subbasin to avoid. This must include a quantitative description of the negative effects to beneficial uses and users that would be experienced at undesirable result conditions. The GSAs should fully disclose and describe and explain its rationale for determining the number of wells that may be dewatered and the level of impacts to groundwater dependent ecosystems that may occur without rising to significant and unreasonable levels constituting undesirable results. Lastly, the GSAs should explain how potential alternate supplies of water or well mitigation will be considered by the GSAs during their management of the Subbasin in a project or management action as part of the GSP. Department staff also encourage the GSAs to review the Department's April 2023 guidance document titled *Considerations for Identifying and Addressing Drinking Water Well Impacts*.
  2. Revise minimum thresholds to be set at the level where the depletion of supply across the Subbasin may lead to undesirable results and provide the criteria used to establish and justify minimum thresholds. Fully document the analysis and justifications performed to establish the criteria used to establish minimum thresholds. Clearly show each step of the analysis and provide supporting information used in the analysis.
  3. Provide an evaluation of how minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property

interests.<sup>1</sup> Identify the number and location of wells that may be negatively affected when minimum thresholds are reached. Compare well infrastructure for all well types in the Subbasin with minimum thresholds at nearby, suitably representative, monitoring sites. Document all assumptions and steps clearly so that it will be understood by readers of the GSP. Include maps of potentially affected well locations, identify the number of potentially affected wells by well type, and provide a supporting discussion of the effects.

4. Analyze how groundwater level minimum thresholds, which allow continued declines in the Subbasin, may impact land subsidence conditions.
- C. The GSAs must provide a more detailed explanation and justification regarding the selection of the sustainable management criteria, monitoring method, and projects or management actions related to land subsidence. Department staff recommend the GSAs consider and address the following:
1. Identify facilities and/or structures, land uses and property interests that may be susceptible to impacts from land subsidence and should quantify the amount of land subsidence that would result in functional impacts to that infrastructure. The GSAs should describe the rationale and any analysis performed to inform the quantification of undesirable results in these areas. Provide maps and graphs showing the extent and rate of land subsidence in the basin at the minimum threshold.
  2. Provide the information and criteria relied upon to establish and justify the minimum threshold.<sup>2</sup> Describe how the interests of beneficial uses and users may be affected if conditions reach minimum thresholds.
  3. Revise the individual minimum thresholds to identify the rate and extent of land subsidence that substantially interferes with surface land uses and may lead to undesirable results. Identify a cumulative amount of tolerable subsidence that, if exceeded, would substantially interfere with groundwater and land surface beneficial uses and users in the Subbasin. The GSAs should also explain how the rate and extent of any future subsidence permitted in the Subbasin may interfere with surface land uses.

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<sup>1</sup> 23 CCR 354.28 (b)(4).

<sup>2</sup> 23 CCR § 354.28 (b)(1).

4. Provide a clear schedule for more frequent land subsidence monitoring using the best available data and describe how the monitoring data will be evaluated to determine if undesirable results are occurring in the Subbasin. If the GSAs determine not to use available InSAR data, the GSAs should provide support and justification for why an alternative approach that excludes InSAR data is reasonable and uses the best available information.
5. Provide specific details and schedule for projects or management actions that will be implemented to minimize or eliminate subsidence. The projects or management actions must be supported by best available information and science<sup>3</sup> and take into account the level of uncertainty associated with the Subbasin.

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<sup>3</sup> 23 CCR § 354.44 (c).



Statement of Findings  
Sacramento Valley – Colusa Subbasin (No. 5-021.52)

October 26, 2023

Based on the above, the GSP submitted by the Agencies for the Sacramento Valley – Colusa Subbasin is determined to be incomplete because the GSP does not satisfy the requirements of SGMA, nor does it substantially comply with the GSP Regulations. The corrective actions provided in the Staff Report are intended to address the deficiencies that, at this time, preclude approval. The Agencies have up to 180 days to address the deficiencies outlined above and detailed in the Staff Report. Once the Agencies resubmit its Plan, the Department will review the revised GSP to evaluate whether the deficiencies were adequately addressed. Should the Agencies fail to take sufficient actions to correct the deficiencies identified by the Department in this assessment, the Department shall disapprove the Plan if, after consultation with the State Water Resources Control Board, the Department determines the Plan inadequate pursuant to 23 CCR § 355.2(e)(3)(C).

Signed:



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Karla Nemeth, Director  
Date: October 26, 2023

Enclosure: Groundwater Sustainability Plan Assessment Staff Report – Sacramento Valley – Colusa Subbasin

**State of California**  
**Department of Water Resources**  
**Sustainable Groundwater Management Program**  
**Groundwater Sustainability Plan Assessment**  
**Staff Report**

Groundwater Basin Name: Sacramento Valley – Colusa Subbasin (No. 5-021.52)  
Colusa Groundwater Authority Groundwater  
Submitting Agency: Sustainability Agency and Glenn Groundwater Authority  
Groundwater Sustainability Agency  
Submittal Type: Initial GSP Submission  
Submittal Date: January 28, 2022  
Recommendation: Incomplete  
Date: October 26, 2023

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The Colusa Groundwater Authority Groundwater Sustainability Agency and Glenn Groundwater Authority Groundwater Sustainability Agency (collectively, the GSAs) submitted the Colusa Subbasin Groundwater Sustainability Plan (GSP or Plan) to the Department of Water Resources (Department) for evaluation and assessment as required by the Sustainable Groundwater Management Act (SGMA)<sup>1</sup> and the GSP Regulations.<sup>2</sup> The GSP covers the entire Sacramento Valley – Colusa Subbasin (Subbasin) for the implementation of SGMA. As presented in this staff report, a single GSP covering the entire basin was adopted and submitted to the Department for review by the GSAs.<sup>3</sup>

Evaluation and assessment by the Department is based on whether an adopted and submitted GSP, either individually or in coordination with other adopted and submitted GSPs, complies with SGMA and substantially complies with the GSP Regulations. Department staff base its assessment on information submitted as part of an adopted GSP, public comments submitted to the Department, and other materials, data, and reports that are relevant to conducting a thorough assessment. Department staff have evaluated the GSP and have identified deficiencies that staff recommend should preclude its approval.<sup>4</sup> In addition, consistent with the GSP Regulations, Department staff have provided required corrective actions<sup>5</sup> that the GSAs should review while determining how and whether to address the deficiencies. The deficiencies and required corrective actions are explained in greater detail in Section 3 of this staff report and are generally related to

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<sup>1</sup> Water Code § 10720 *et seq.*

<sup>2</sup> 23 CCR § 350 *et seq.*

<sup>3</sup> Water Code §§ 10727(b)(1), 10733.4; 23 CCR § 355.2.

<sup>4</sup> 23 CCR §355.2(e)(2).

<sup>5</sup> 23 CCR §355.2(e)(2)(B).

the need to define sustainable management criteria in the manner required by SGMA and the GSP Regulations.

This assessment includes four sections:

- **Section 1 – Evaluation Criteria**: Describes the legislative requirements and the Department’s evaluation criteria.
- **Section 2 – Required Conditions**: Describes the submission requirements, GSP completeness, and basin coverage required for a GSP to be evaluated by the Department.
- **Section 3 – Plan Evaluation**: Provides a detailed assessment of identified deficiencies in the GSP. Consistent with the GSP Regulations, Department staff have provided corrective actions for the GSAs to address the deficiencies.
- **Section 4 – Staff Recommendation**: Provides staff’s recommendation regarding the Department’s determination.

# 1 EVALUATION CRITERIA

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The Department evaluates whether a Plan conforms to the statutory requirements of SGMA<sup>6</sup> and is likely to achieve the basin’s sustainability goal.<sup>7</sup> To achieve the sustainability goal, the Plan must demonstrate that implementation will lead to sustainable groundwater management, which means the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results.<sup>8</sup> Undesirable results are required to be defined quantitatively by the GSA overlying a basin and occur when significant and unreasonable effects for any of the applicable sustainability indicators are caused by groundwater conditions occurring throughout the basin.<sup>9</sup> The Department is also required to evaluate whether the Plan will adversely affect the ability of an adjacent basin to implement its groundwater sustainability program or achieve its sustainability goal.<sup>10</sup>

For a Plan to be evaluated by the Department, it must first be determined that it was submitted by the statutory deadline<sup>11</sup> and that it is complete and covers the entire basin.<sup>12</sup> If these required conditions are satisfied, the Department evaluates the Plan to determine whether it complies with SGMA and substantially complies with the GSP Regulations.<sup>13</sup> As stated in the GSP Regulations, “[s]ubstantial compliance means that the supporting information is sufficiently detailed and the analyses sufficiently thorough and reasonable, in the judgment of the Department, to evaluate the Plan, and the Department determines that any discrepancy would not materially affect the ability of the Agency to achieve the sustainability goal for the basin, or the ability of the Department to evaluate the likelihood of the Plan to attain that goal.”<sup>14</sup>

When evaluating whether the Plan is likely to achieve the sustainability goal for the basin, Department staff review the information provided for sufficiency, credibility, and consistency with scientific and engineering professional standards of practice.<sup>15</sup> The Department’s review considers whether there is a reasonable relationship between the information provided by the GSA and the assumptions and conclusions presented in the Plan, including: whether the interests of the beneficial uses and users of groundwater in the basin have been considered; whether sustainable management criteria and projects and management actions described in the Plan are commensurate with the level of understanding of the basin setting; and whether those projects and management actions

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<sup>6</sup> Water Code §§ 10727.2, 10727.4, 10727.6.

<sup>7</sup> Water Code § 10733(a).

<sup>8</sup> Water Code § 10721(v).

<sup>9</sup> 23 CCR § 354.26.

<sup>10</sup> Water Code § 10733(c).

<sup>11</sup> 23 CCR § 355.4(a)(1).

<sup>12</sup> 23 CCR §§ 355.4(a)(2), 355.4(a)(3).

<sup>13</sup> 23 CCR § 350 *et seq.*

<sup>14</sup> 23 CCR § 355.4(b).

<sup>15</sup> 23 CCR § 351(h).

are feasible and likely to prevent undesirable results.<sup>16</sup> The Department also considers whether the GSAs have the legal authority and financial resources necessary to implement the Plan.<sup>17</sup>

To the extent overdraft is present in a basin, the Department evaluates whether the Plan provides a reasonable assessment of the overdraft and includes reasonable means to mitigate it.<sup>18</sup> The Department also considers whether the Plan provides reasonable measures and schedules to eliminate identified data gaps.<sup>19</sup> Lastly, the Department's review considers the comments submitted on the Plan and evaluates whether the GSAs have adequately responded to the comments that raise credible technical or policy issues with the Plan.<sup>20</sup>

The Department is required to evaluate the Plan within two years of its submittal date and issue a written assessment.<sup>21</sup> The assessment is required to include a determination of the Plan's status.<sup>22</sup> The GSP Regulations provide three options for determining the status of a Plan: approved,<sup>23</sup> incomplete,<sup>24</sup> or inadequate.<sup>25</sup>

Even when the Department determines a Plan is approved, indicating that it satisfies the requirements of SGMA and is in substantial compliance with the GSP Regulations, the Department may still recommend corrective actions.<sup>26</sup> Recommended corrective actions are intended to facilitate progress in achieving the sustainability goal within the basin and the Department's future evaluations, and to allow the Department to better evaluate whether implementation of the Plan adversely affects adjacent basins. While the issues addressed by the recommended corrective actions in an approved Plan do not, at the time the determination was made, preclude its approval, the Department recommends that the issues be addressed to ensure the Plan's implementation continues to be consistent with SGMA and the Department is able to assess progress in achieving the basin's sustainability goal.<sup>27</sup> Unless otherwise noted, the Department proposes that recommended corrective actions be addressed by the submission date for the first periodic assessment.<sup>28</sup>

After review of the Plan, Department staff may conclude that the information provided is not sufficiently detailed, or the analyses not sufficiently thorough and reasonable, to evaluate whether it is likely to achieve the sustainability goal for the basin. If the

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<sup>16</sup> 23 CCR §§ 355.4(b)(1), (3), (4) and (5).

<sup>17</sup> 23 CCR § 355.4(b)(9).

<sup>18</sup> 23 CCR § 355.4(b)(6).

<sup>19</sup> 23 CCR § 355.4(b)(2).

<sup>20</sup> 23 CCR § 355.4(b)(10).

<sup>21</sup> Water Code § 10733.4(d); 23 CCR § 355.2(e).

<sup>22</sup> Water Code § 10733.4(d); 23 CCR § 355.2(e).

<sup>23</sup> 23 CCR § 355.2(e)(1).

<sup>24</sup> 23 CCR § 355.2(e)(2).

<sup>25</sup> 23 CCR § 355.2(e)(3).

<sup>26</sup> Water Code § 10733.4(d).

<sup>27</sup> Water Code § 10733.8.

<sup>28</sup> 23 CCR § 356.4.

Department determines the deficiencies precluding approval may be capable of being corrected by the GSA in a timely manner,<sup>29</sup> the Department will determine the status of the Plan to be incomplete. A Plan deemed incomplete may be revised and resubmitted to the Department for reevaluation of whether all deficiencies have been addressed and incorporated into the Plan within 180 days after the Department makes its incomplete determination. The Department will review the revised Plan to evaluate whether the identified deficiencies were sufficiently addressed. Depending on the outcome of that evaluation, the Department may determine the resubmitted Plan is approved. Alternatively, the Department may find a formerly deemed incomplete GSP is inadequate if, after consultation with the State Water Resources Control Board, it determines that the GSA have not taken sufficient actions to correct any identified deficiencies.<sup>30</sup>

The staff assessment of the Plan involves the review of information presented by the GSAs, including models and assumptions, and an evaluation of that information based on scientific reasonableness. In conducting its assessment, the Department does not recalculate or reevaluate technical information provided in the Plan or perform its own geologic or engineering analysis of that information. The recommendation to approve a Plan does not signify that Department staff, were they to exercise the professional judgment required to develop a Plan for the basin, would make the same assumptions and interpretations as those contained in the Plan, but simply that Department staff have determined that the assumptions and interpretations relied upon by the submitting GSA are supported by adequate, credible evidence, and are scientifically reasonable.

Lastly, the Department's review and assessment of an approved Plan is a continual process. Both SGMA and the GSP Regulations provide the Department with the ongoing authority and duty to review the implementation of the Plan.<sup>31</sup> Also, GSAs have an ongoing duty to reassess their GSPs, provide annual reports to the Department, and, when necessary, update or amend their GSPs.<sup>32</sup> The passage of time or new information may make what is reasonable and feasible at the time of this review to not be so in the future. The emphasis of the Department's periodic reviews will be to assess the GSA's progress toward achieving the basin's sustainability goal and whether implementation of the Plan adversely affects the ability of GSA in adjacent basins to achieve their sustainability goals.

## 2 REQUIRED CONDITIONS

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A GSP, to be evaluated by the Department, must be submitted within the applicable statutory deadline.<sup>33</sup> The GSP must also be complete and must, either on its own or in coordination with other GSPs, cover the entire basin. If a GSP is determined to be

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<sup>29</sup> 23 CCR § 355.2(e)(2)(B)(i).

<sup>30</sup> 23 CCR § 355.2(e)(3)(C).

<sup>31</sup> Water Code § 10733.8; 23 CCR § 355.6.

<sup>32</sup> Water Code §§ 10728, 10728.2.

<sup>33</sup> Water Code § 10720.7.

incomplete, Department staff may require corrective actions that address minor or potentially significant deficiencies identified in the GSP. The GSA must sufficiently address those required corrective actions within the time provided, not to exceed 180 days, for the GSP to be reevaluated by the Department and potentially approved.

## 2.1 SUBMISSION DEADLINE

SGMA required basins categorized as high- or medium-priority as of January 1, 2017, to submit a GSP no later than January 31, 2022.<sup>34</sup>

The GSAs submitted the Colusa GSP to the Department on January 28, 2022, in compliance with the statutory deadline.

## 2.2 COMPLETENESS

GSP Regulations specify that the Department shall evaluate a GSP if that GSP is complete and includes the information required by SGMA and the GSP Regulations.<sup>35</sup>

The GSA submitted an adopted GSP for the entire Subbasin. Department staff found the Colusa GSP to be complete and include the required information, sufficient to warrant an evaluation by the Department. Therefore, the Department posted the GSP to its website on February 7, 2022.

## 2.3 BASIN COVERAGE

A GSP, either on its own or in coordination with other GSPs, must cover the entire basin.<sup>36</sup> A GSP that intends to cover the entire basin may be presumed to do so if the basin is fully contained within the jurisdictional boundaries of the submitting GSA.

The GSP intends to manage the entire Colusa Subbasin and the jurisdictional boundaries of the submitting GSA appear to cover the entire Subbasin.

## 3 PLAN EVALUATION

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As stated in Section 355.4 of the GSP Regulations, a basin “shall be sustainably managed within 20 years of the applicable statutory deadline consistent with the objectives of the Act.” The Department’s assessment is based on a number of related factors including whether the elements of a GSP were developed in the manner required by the GSP Regulations, whether the GSP was developed using appropriate data and methodologies and whether its conclusions are scientifically reasonable, and whether the GSP, through the implementation of clearly defined and technically feasible projects and management actions, is likely to achieve a tenable sustainability goal for the basin.

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<sup>34</sup> Water Code § 10720.7(a)(2).

<sup>35</sup> 23 CCR § 355.4(a)(2).

<sup>36</sup> Water Code § 10727(b); 23 CCR § 355.4(a)(3).

Department staff have identified deficiencies in the GSP, the most serious of which preclude staff from recommending approval of the GSP at this time. Department staff believe the GSA may be able to correct the identified deficiencies within 180 days. Consistent with the GSP Regulations, Department staff are providing corrective actions related to the deficiencies, detailed below, including the general regulatory background, the specific deficiency identified in the GSP, and the specific actions to address the deficiency.

Department staff have concluded the GSP as proposed does not conform with the requirements of SGMA and is not likely to achieve the sustainability goals for the basin. The GSP does not sufficiently identify and propose management for current conditions including the overdraft, chronic lowering of groundwater levels, and land subsidence. The GSP does not establish sustainable management criteria that considered effects on the full range of known beneficial uses and users, such as domestic wells and critical infrastructure.

### **3.1 DEFICIENCY 1. THE GSP DOES NOT INCLUDE A REASONABLE ASSESSMENT OF OVERDRAFT CONDITIONS AND REASONABLE MEANS TO MITIGATE OVERDRAFT.**

#### **3.1.1 Background**

For basins where overdraft conditions occur, the GSP Regulations require a Plan to quantify the overdraft over a period of years during which water year and water supply conditions approximate average conditions.<sup>37</sup> Furthermore, the Plan must describe projects or management actions, including quantification of demand reduction or other methods, for the mitigation of overdraft and achievement of the sustainability goal for the basin.<sup>38</sup>

As part of the Department's evaluation, staff assess whether the Plan provides a reasonable assessment of overdraft conditions and includes reasonable means to mitigate overdraft, if present.<sup>39</sup> To substantially comply with the GSP Regulations,<sup>40</sup> the assessment provided in the Plan must be supported with sufficiently detailed information and the analyses must be sufficiently thorough and reasonable. Discussion and analyses in a Plan must be detailed and thorough enough for Department staff to evaluate if any discrepancy in the information provided in the Plan may materially affect the ability of the Agency to achieve the sustainability goal for the basin.

#### **3.1.2 Deficiency Details**

The GSP Regulations require the Department to evaluate whether the Plan includes a reasonable assessment of overdraft conditions and includes a reasonable means to

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<sup>37</sup> 23 CCR § 354.18(b)(5).

<sup>38</sup> 23 CCR §§ 354.44(a) and 354.44(b)(2).

<sup>39</sup> 23 CCR § 355.4 (b)(6).

<sup>40</sup> 23 CCR § 355.4 (b).



mitigate overdraft.<sup>41</sup> While the GSP presents information about overdraft, it is unclear whether this assessment is reasonable or uses the best available information, because the GSP's reported overdraft varies greatly from recent change in groundwater storage data. Furthermore, the projects and management actions proposed in the GSP, which have been developed to address the projected overdraft conditions, do not appear to be sufficient to mitigate the actual overdraft conditions in the Subbasin. Department staff have identified this as a deficiency that should preclude plan approval at this time. The following section describes specific details about the deficiency and outlines one or more corrective actions the GSAs must take to address to correct it.

The GSP presents conflicting information about overdraft occurring in the Subbasin. While the Plan acknowledges overdraft is observed in the Subbasin in the historical and projected water budgets, the current water budget shows a positive change in storage. The historical water budget, which reflects the period from 1990 to 2015, estimates an average negative change in groundwater storage (overdraft) of 28,000 acre-feet per year (AFY).<sup>42</sup> The change in storage figure provided in the GSP shows annual overdraft has increased recently resulting in an overdraft of approximately 1,000,000 acre-feet from 2006 to 2015.<sup>43</sup> However, the Plan's current water budget shows an increase in storage of 1,000 AFY. The projected water budget with future land use and climate change anticipates an increase in groundwater pumping by 58,000 AFY yet presents a lower value of overdraft of 7,300 AFY (cumulative change in groundwater storage of -365,000 acre-feet) over the 50-year implementation horizon.<sup>44</sup>

Since the GSP submittal, annual report data submitted to the Department demonstrates that groundwater storage within the Subbasin has dramatically decreased, deviating from the values reported in the GSP for the historical and projected water budgets. Specifically, the overdraft reported for water year (WY) 2021 (which represents change between October 1, 2020, and September 30, 2021) was -418,000 acre-feet and -377,170 acre-feet for WY 2022.<sup>45</sup> Combined, these values represent a loss of storage of over 795,000 acre-feet in just a two-year period, which is more than double the anticipated overdraft predicted over the 50-year implementation horizon. Department staff recognize WY 2021 and WY 2022 were critically dry years; however, the magnitude of the loss of storage observed during these two years is significantly greater than the average value provided in the historical water budget of -166,000 acre-feet for the previous critically dry water year types, indicating that overdraft is increasing.<sup>46</sup> Based on a review of the information included in the GSP and annual reports, and the discrepancies in the reported projections of overdraft, Department staff are unable to conclude the GSAs have included a

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<sup>41</sup> 23 CCR § 355.4(b)(6).

<sup>42</sup> Colusa Subbasin GSP, Table 3-12, p. 215.

<sup>43</sup> Colusa Subbasin GSP, Figure 3-29, p. 184.

<sup>44</sup> Colusa Subbasin GSP, Section 3.3.6, p. 229.

<sup>45</sup> Department of Water Resources, SGMA Portal, Annual Report Module, WY 2021 and WY 2022 Data, Reported Overdraft, Colusa Subbasin.

<sup>46</sup> Colusa Subbasin GSP, Table 3-13, p. 218.

reasonable assessment of overdraft conditions for the Subbasin based on the best available information. (See [Corrective Action 1a](#)).

GSP Regulations require the Department to evaluate whether the Plan includes a reasonable means to mitigate overdraft.<sup>47</sup> While the GSP documents a projected groundwater overdraft in the Subbasin of 7,300 AFY, Department staff believe the actual overdraft the GSAs will be required to mitigate is likely much more based on information included in the GSP and annual reports. The GSP proposes an adaptive management approach with planned projects and management actions to address groundwater level declines in the Orland and Arbuckle areas and a portfolio of other ongoing and potential projects to achieve sustainability across the Subbasin.<sup>48</sup> The planned projects all involve reducing groundwater pumping by securing more surface water for direct application or in-lieu groundwater recharge.

The GSP states that the expected benefits of all planned projects will provide more than 80,000 AFY to the Subbasin at full implementation and “are expected to address potential sustainability concerns in the projected future conditions water budgets, even under the effects of 2070 CT climate change.”<sup>49</sup> However, Department staff note the GSP states that certain projects will not be available for implementation during critically dry years and two of the projects described as ongoing are described as having expiring contracts so the actual benefits of these projects may be lower than the projected values. Further, given the recent reduction of groundwater storage of 795,000 acre-feet in the last two years, it would take nearly ten years of these projects being fully implemented combined with the Subbasin operating within its sustainable yield to offset this loss of storage. While SGMA states that overdraft during a period of drought is not sufficient to establish an undesirable result for the chronic lowering of groundwater levels, this is contingent on the GSAs managing extractions and recharge as necessary to ensure that reductions in groundwater levels or storage are offset by increases in groundwater levels or storage during other periods.<sup>50</sup> Based on the information contained in the GSP, it does not appear the GSAs have proposed a suite of projects and management actions that will be sufficient to offset the recent overdraft observed in the Subbasin. The GSAs do not appear to have an urgency to implement the necessary projects and management actions to mitigate overdraft and Department staff are concerned that continued overdraft will exacerbate the current problems the basin is experiencing, which include dry wells and worsening land subsidence. Accordingly, for the above reasons, Department staff cannot conclude that the GSP has presented a reasonable means to mitigate overdraft (see [Corrective Action 1b](#)).

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<sup>47</sup> 23 CCR § 355.4(b)(6).

<sup>48</sup> Colusa Subbasin GSP, Chapter 6, p. 301.

<sup>49</sup> Colusa Subbasin GSP, Section 6.2.2, p. 312.

<sup>50</sup> Water Code § 10721(x)(1).

### 3.1.3 Corrective Action 1

The GSAs should revise the GSP to provide a reasonable assessment of overdraft conditions using the best available information and describe a reasonable means to mitigate overdraft. Specifically, the Plan must be amended as follows:

- a. Reevaluate the assessment of overdraft conditions in the Subbasin. Specifically, the GSAs should examine the assumptions that were used to develop the current overdraft and the projected overdraft estimates in the projected water budget considering the results vary greatly from the values reported in the recent annual report data. The assessment should include the latest information for the Subbasin to ensure the GSP includes the required projects and management actions to mitigate overdraft in the Subbasin.
- b. Develop and describe a reasonable means to mitigate the overdraft that is continuing to occur in the Subbasin. Specifically, the GSAs should describe proposed management actions that are commensurate with the level of understanding of groundwater conditions in the Subbasin and provide sufficient details for Department staff to be able to clearly understand how the Plan's projects and management actions will mitigate overdraft in the Subbasin under different climate scenarios.

## 3.2 DEFICIENCY 2. THE GSP DOES NOT ESTABLISH SUSTAINABLE MANAGEMENT CRITERIA FOR CHRONIC LOWERING OF GROUNDWATER LEVELS IN A MANNER SUBSTANTIALLY COMPLIANT WITH THE GSP REGULATIONS.

### 3.2.1 Background

It is up to the GSA to define undesirable results and describe the effect of undesirable results on the beneficial uses and users of groundwater.<sup>51</sup> From this definition, the GSA establishes minimum thresholds, which are quantitative values that represent groundwater conditions at representative monitoring sites that, when exceeded individually or in combination with minimum thresholds at other monitoring sites, may cause the basin to experience undesirable results.<sup>52</sup> Put another way, the minimum thresholds represent conditions that, if not exceeded, should prevent the basin from experiencing the undesirable results identified by the GSA. Minimum thresholds for chronic lowering of groundwater levels are the groundwater elevation indicating a depletion of supply at a given location that may lead to undesirable results.<sup>53</sup> Quantitative values for minimum thresholds should be supported by information and criteria relied upon to establish and justify the minimum threshold,<sup>54</sup> and a quantitative description of

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<sup>51</sup> 23 CCR § 354.26 (b)(3), § 354.28 (b)(4).

<sup>52</sup> 23 CCR § 354.28, DWR Best Management Practices for the Sustainable Management of Groundwater: Sustainable Management Criteria (DRAFT), November 2017.

<sup>53</sup> 23 CCR § 354.28 (c)(1).

<sup>54</sup> 23 CCR § 354.28 (b)(1).

how conditions at minimum thresholds may affect the interests of beneficial uses and users of groundwater.<sup>55</sup>

### 3.2.2 Deficiency Details

Based on its review, Department staff conclude the Plan has not defined sustainable management criteria for chronic lowering of groundwater levels in a manner required by SGMA and the GSP Regulations. Generally, the GSP's descriptions of undesirable results are unclear and justification for the establishment of minimum thresholds is not provided with evidence of the consideration of the interests of beneficial uses and users, and sufficient supporting information is not provided in the GSP. The lack of this information limits Department staff's ability to evaluate whether the criteria are reasonable or whether the GSA plans to operate the Subbasin to avoid undesirable results.<sup>56</sup>

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 that is present when an undesirable result occurs.<sup>57</sup> The GSP describes an undesirable result as: "if sustained groundwater levels are too low to reasonably satisfy beneficial uses and users within the Subbasin over the planning and implementation horizon of this GSP."<sup>58</sup> The GSP additionally states that an undesirable result would occur "when 25 percent or more of the representative monitoring wells (i.e., 12 of 48 wells) in the Subbasin fall below their minimum groundwater elevation threshold levels for 24 consecutive months."<sup>59</sup>

Department staff have identified deficiencies with how the GSAs have defined undesirable results. The Plan's definition of undesirable results uses undefined qualifying language that renders the meaning indeterminate. The GSP aims to prevent "...levels [that] are too low to reasonably satisfy beneficial uses and users within the Subbasin," as mentioned above. However, the GSP does not define or describe these conditions, or explain who would make this determination. Additionally, without a quantitative definition or clear description of the qualifier "reasonably", it is unclear how the GSAs will identify whether observed impacts would be considered significant and unreasonable. While the GSP includes in its portfolio of potential management actions a domestic well mitigation program, this management action "is currently in the early conceptual stage"<sup>60</sup> and "would only be implemented if determined to be necessary under future monitoring of the Subbasin."<sup>61</sup> The GSP indicates each GSA will investigate implementing a program in its respective portions of the Subbasin and acknowledge details of the potential programs have yet to be determined. Consequently, the GSP presents no details regarding the action's implementation timeline, criteria for implementation, benefits, or costs and

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<sup>55</sup> 23 CCR § 354.28 (b)(4).

<sup>56</sup> 23 CCR §§ 354.28(b)(1), 354.28(b)(2), 354.28(b)(3), 354.28(b)(4), 354.28(c)(1).

<sup>57</sup> 23 CCR § 354.26 (a).

<sup>58</sup> Colusa Subbasin GSP, Section 5.3.1.1, p. 269.

<sup>59</sup> Colusa Subbasin GSP, Section 5.3.1.2, p. 270.

<sup>60</sup> Colusa Subbasin GSP, Table 6-46, p. 384.

<sup>61</sup> Colusa Subbasin GSP, Section 6.5.1, p. 359.

funding. Without more information, Department staff are unable to evaluate when and how the well mitigation program may be implemented or evaluate its potential feasibility and effectiveness at this time.

Additionally, the Plan defines undesirable results as a function of minimum conditions necessary to reasonably satisfy beneficial uses and users of groundwater but does not describe or explain what those conditions would be or how they were determined. This is compounded by the fact that the Plan does not demonstrate how or whether the interests of those beneficial uses and users were considered. As a result, it would not be possible to know whether it was appropriate to the needs of beneficial uses and users in the Subbasin, as determined by the GSAs. The quantification of undesirable results as 25 percent or more of the representative monitoring wells (i.e., 12 of 48 wells) in the Subbasin fall below their minimum groundwater elevation threshold levels for 24 consecutive months is unsatisfactory because the Plan does not explain why this threshold would avoid effects the GSAs have determined to be significant and unreasonable. On the contrary, the values and timing of exceedances appear to be arbitrary.

The lack of specificity in what the GSAs are managing the Subbasin to avoid (i.e., undesirable results) is especially problematic considering current and projected conditions. The Subbasin has already experienced 102 dry wells according to the Household Dry Well Reporting System.<sup>62</sup> The GSAs have proposed minimum thresholds that will allow at least 20 percent of the Subbasin's 3,500 domestic wells<sup>63</sup> (700 wells) to be dewatered. The GSAs have not explained how it was determined the current and projected well outages in the Subbasin are not considered an undesirable result, even though those conditions appear to meet the definition of an undesirable result provided in the GSP (i.e., "sustained groundwater levels are too low to reasonably satisfy beneficial uses and users within the Subbasin"). Department staff conclude the GSAs must reevaluate and clearly define and provide its rationale for when undesirable results occur in the Subbasin, based on a thorough consideration of the interests of beneficial uses and users of groundwater, as required by the GSP Regulations (see [Corrective Action 2a](#)).

The GSP Regulations require GSAs to set the minimum thresholds for chronic lowering of groundwater levels at "the groundwater elevation indicating a depletion of supply at a given location that may lead to undesirable results."<sup>64</sup> The GSP sets minimum thresholds for the principal aquifer as the deeper value of the 20<sup>th</sup> percentile of shallowest domestic well depths in the monitoring well's Thiessen polygon, or 50 percent of [historical] range below the historical low groundwater elevation.<sup>65</sup> The GSAs use the 20<sup>th</sup> percentile of shallowest domestic well depths for 35 of the 48 representative monitoring sites and 50 percent of the range below the historical low for the remaining 13 representative

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<sup>62</sup> Department of Water Resources, Dry Well Reporting System, Accessed September 2023, <https://mydrywatersupply.water.ca.gov/report/>.

<sup>63</sup> Colusa Subbasin GSP, Section 2.1.2.4, p. 88.

<sup>64</sup> 23 CCR § 354.28(c)(1).

<sup>65</sup> Colusa Subbasin GSP, Section 5.4.1.1, p. 284.

monitoring sites.<sup>66</sup> For these 13 sites, the protection of 80 percent of domestic wells does not apply to their Thiessen polygons, and the GSP explains these minimum thresholds were developed to provide adequate operational flexibility to protect the conjunctive use of groundwater for agricultural production.<sup>67</sup>

The GSAs acknowledge some of the minimum thresholds were not developed to represent a depletion of supply that would lead to undesirable results, but instead developed to “protect the conjunctive use of groundwater for agricultural production.”<sup>68</sup> The GSP does not explain why the value of 50 percent of the range of historical levels was selected or why this threshold represents a depletion of supply. The Plan does not adequately describe the information used to develop the criteria used to establish this minimum threshold,<sup>69</sup> nor explain how managing the Subbasin to this minimum threshold will avoid the undesirable results it describes and defines. The subjective and vague nature of the GSP’s undesirable result definitions (as discussed above) compounds this problem. Department staff conclude that the minimum thresholds must be revised by the GSAs to be based upon the depletion of supply that would lead to undesirable results (see [Corrective Action 2b](#)).

GSP Regulations require GSAs to consider how conditions at minimum thresholds may affect the interests of beneficial uses and users of groundwater<sup>70</sup> and require the Department to evaluate whether the interests of those beneficial uses and users were considered.<sup>71</sup> While the GSAs utilized the 20<sup>th</sup> percentile of domestic well depth to establish the majority of the minimum threshold values, for 13 of the sites they selected a deeper threshold and the potential effects to the beneficial uses and users in these areas is unclear. Further, the GSAs do not describe how allowing more than 20 percent of domestic wells to go dry has considered the interests of these particular beneficial uses and users. Considering that the GSAs have set minimum thresholds substantially below historical lows, the Plan does not provide a clear description of the circumstances under which such impacts would become significant and unreasonable to particular beneficial uses and users. Department staff are unable to determine whether the interests of beneficial uses and users of groundwater, as well as the land uses and property interests potentially affected by the use of groundwater in the Subbasin, have been considered.<sup>72</sup> The GSAs must identify the number, location, and percentage of all wells that may be impacted at the proposed minimum thresholds that will not receive assistance through the well mitigation program and explain how the interests of beneficial uses and users were considered (see [Corrective Action 2c](#)).

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<sup>66</sup> Colusa Subbasin GSP, Table 5-2, p. 285.

<sup>67</sup> Colusa Subbasin GSP, Section 5.4.1.1, p. 284.

<sup>68</sup> Colusa Subbasin GSP, Section 5.4.1.1, p. 284.

<sup>69</sup> 23 CCR 354.28 (a).

<sup>70</sup> 23 CCR 354.28 (b)(4).

<sup>71</sup> 23 CCR 355.4 (b)(4).

<sup>72</sup> 23 CCR § 355.4 (b)(4).

GSP Regulations require GSAs to discuss the relationship between the minimum thresholds for each sustainability indicator, including an explanation of how the GSA has determined that basin conditions at each minimum threshold will avoid undesirable results for each of the sustainability indicators.<sup>73</sup> The GSP discusses the relationship between groundwater levels and land subsidence by stating, “The minimum thresholds for groundwater levels are not expected to contribute to undesirable results for inelastic land subsidence, as they are protective of a range around historical groundwater elevations.”<sup>74</sup> The discussion included in the GSP describing the relationship between land subsidence is insufficient, especially considering areas within the Subbasin are prone to, and have active, land subsidence conditions. The GSP proposes minimum thresholds that allow groundwater levels to drop more than 150 feet in portions of the Subbasin, including substantial declines between 100 and 150 feet near Arbuckle and 50 to 100 feet near Orland in areas experiencing land subsidence. Based on the currently proposed thresholds, it is highly likely the Subbasin will experience ongoing and potentially worsening land subsidence as water levels decline during plan implementation. It is imperative the GSAs include a robust discussion of the relationship between the proposed groundwater level thresholds and land subsidence and analyze how allowing continued declines in the Subbasin will impact land subsidence conditions (see [Corrective Action 2d](#)).

### 3.2.3 Corrective Action 2

The GSA must provide a more detailed explanation and justification regarding the selection of the sustainable management criteria for groundwater levels, particularly minimum thresholds, and quantitatively describe the effects of those criteria on the interests of beneficial uses and users of groundwater. Department staff recommend the GSA consider and address the following:

- a. Refine the description of undesirable results to clearly describe the significant and unreasonable conditions the GSA is managing the Subbasin to avoid. This must include a quantitative description of the negative effects to beneficial uses and users that would be experienced at undesirable result conditions.<sup>75</sup> The GSA should fully disclose and describe and explain its rationale for determining the number of wells that may be dewatered and the level of impacts to groundwater dependent ecosystems that may occur without rising to significant and unreasonable levels constituting undesirable results. Lastly, the GSA should explain how potential alternate supplies of water or well mitigation will be considered by the GSA during its management of the Subbasin in a project or management action as part of the GSP. Department staff also encourage the

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<sup>73</sup> 23 CCR § 354.28 (b)(2).

<sup>74</sup> Colusa Subbasin GSP, Section 5.4.1.1.1, p. 286.

<sup>75</sup> 23 CCR § 354.28 (b)(3).

GSAs to review the Department's April 2023 guidance document titled *Considerations for Identifying and Addressing Drinking Water Well Impacts*.<sup>76</sup>

- b. Revise minimum thresholds to be set at the level where the depletion of supply across the Subbasin may lead to undesirable results<sup>77</sup> and provide the criteria used to establish and justify minimum thresholds.<sup>78</sup> Fully document the analysis and justifications performed to establish the criteria used to establish minimum thresholds. Clearly show each step of the analysis and provide supporting information used in the analysis.<sup>79</sup>
- c. Provide an evaluation of how minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property interests.<sup>80</sup> Identify the number and location of wells that may be negatively affected when minimum thresholds are reached. Compare well infrastructure for all well types in the Subbasin with minimum thresholds at nearby, suitably representative, monitoring sites. Document all assumptions and steps clearly so that it will be understood by readers of the GSP. Include maps of potentially affected well locations, identify the number of potentially affected wells by well type, and provide a supporting discussion of the effects.
- d. Analyze how groundwater level minimum thresholds, which allow continued declines in the Subbasin, may impact land subsidence conditions.

### **3.3 DEFICIENCY 3. THE GSP DOES NOT ESTABLISH SUSTAINABLE MANAGEMENT CRITERIA FOR LAND SUBSIDENCE IN A MANNER SUBSTANTIALLY COMPLIANT WITH THE GSP REGULATIONS.**

#### **3.3.1 Background**

The GSP Regulations state that minimum thresholds for land subsidence should identify the rate and extent of subsidence that substantially interferes with surface land uses and may lead to undesirable results. These quantitative values should be established in accordance with SGMA and the GSP Regulations, which require information and criteria relied upon to establish and justify the minimum threshold,<sup>81</sup> and how minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property interests,<sup>82</sup> including maps or graphs showing the rates and extents of

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<sup>76</sup> <https://water.ca.gov/Programs/Groundwater-Management/Drinking-Water-Well>

<sup>77</sup> 23 CCR 354.28 (c)(1).

<sup>78</sup> 23 CCR 354.28 (a).

<sup>79</sup> 23 CCR 354.28 (b)(1).

<sup>80</sup> 23 CCR 354.28 (b)(4).

<sup>81</sup> 23 CCR § 354.28 (b)(1).

<sup>82</sup> 23 CCR § 354.28 (b)(4).



land subsidence defined by the minimum thresholds.<sup>83</sup> Additionally, the legislative intent of SGMA is to avoid or minimize subsidence.<sup>84</sup>

It is up to the GSAs to define undesirable results and the GSAs must describe the effect of undesirable results on the beneficial uses and users of groundwater.<sup>85</sup> From this definition, the GSAs establish minimum thresholds, which are quantitative values that represent groundwater conditions at representative monitoring sites that, when exceeded individually or in combination with minimum thresholds at other monitoring sites, may cause the basin to experience undesirable results.<sup>86</sup> Put another way, the minimum thresholds represent conditions that, if not exceeded, should prevent the Subbasin from experiencing the undesirable results identified by the GSAs.

Minimum thresholds for land subsidence should identify the rate and extent of subsidence that substantially interferes with surface land uses and may lead to undesirable results. These quantitative values should be supported by the identification of land uses and property interests that have been affected, or are likely to be affected, by land subsidence in the Subbasin, including an explanation of how the GSAs have determined and considered those uses and interests, and the GSAs' rationale for establishing minimum thresholds in light of those effects.<sup>87</sup> Further, quantitative values for minimum thresholds should be supported by information and criteria relied upon to establish and justify the minimum threshold,<sup>88</sup> and a quantitative description of how conditions at minimum thresholds may affect the interests of beneficial uses and users of groundwater.<sup>89</sup>

### 3.3.2 Deficiency Details

Based on its review, Department staff conclude the Plan has not defined sustainable management criteria for land subsidence in a manner required by SGMA and the GSP Regulations. Generally, descriptions of undesirable results are unclear, justification for the establishment of minimum thresholds is not provided with evidence of the consideration of the interests of beneficial uses and users, and sufficient supporting information is not provided in the GSP. The lack of these details does not allow Department staff to evaluate whether the criteria are reasonable or whether the GSAs plan to operate the Subbasin to avoid undesirable results.<sup>90</sup>

The GSP defines undesirable results for land subsidence in the Subbasin as “a result that would cause significant and unreasonable impacts to critical infrastructure over the planning and implementation horizon of this GSP.”<sup>91</sup> Department staff regard this

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<sup>83</sup> 23 CCR § 354.28(c)(5).

<sup>84</sup> Water Code § 10720 (e).

<sup>85</sup> 23 CCR § 354.26 (b)(3), § 354.28 (b)(4).

<sup>86</sup> 23 CCR § 354.28, DWR Best Management Practices for the Sustainable Management of Groundwater: Sustainable Management Criteria (DRAFT), November 2017.

<sup>87</sup> 23 CCR § 354.28 (c)(5)(A).

<sup>88</sup> 23 CCR § 354.28 (b)(1).

<sup>89</sup> 23 CCR § 354.28 (b)(4).

<sup>90</sup> 23 CCR §§ 354.28(b) *et seq.*, 354.28(c)(5) *et seq.*

<sup>91</sup> Colusa Subbasin GSP, Section 5.3.5.1, p. 278.

definition to be problematic. Although the GSP provides a general list of critical infrastructure, the GSP does not identify specific infrastructure that the GSA deems “critical” or indicate what effect subsidence would have on that infrastructure and explain the point at which those impacts would become “significant and unreasonable”. The GSP states that “the Subbasin has extensive networks of pipelines and open canals and drains owned by various surface water suppliers that are used to convey irrigation and drain water. These networks are likely the existing infrastructure most sensitive to land subsidence.”<sup>92</sup> However, the GSP does not identify specific infrastructure susceptible to land subsidence or describe what constitutes significant and unreasonable effects. Without specific information describing the features susceptible to experiencing adverse impacts due to subsidence and the point at which the GSA considers those impacts to be significant and unreasonable, Department staff are not able to evaluate whether the Plan has adopted a reasonable approach to avoid those impacts.

The GSP provides some information about infrastructure that is susceptible to subsidence. The GSP states that “the Subbasin has extensive networks of pipelines and open canals and drains owned by various surface water suppliers that are used to convey irrigation and drain water. These networks are likely the existing infrastructure most sensitive to land subsidence.”<sup>93</sup> The GSP provides a map of streams, rivers, and water conveyance features.<sup>94</sup> However, the GSP does not identify specific infrastructure susceptible to land subsidence or describe what constitutes significant and unreasonable effects. Department staff recommend the GSAs identify critical infrastructure susceptible to land subsidence and describe what constitutes significant and unreasonable effects for land subsidence in the Subbasin (see [Corrective Action 3a](#)).

When updating its definition of undesirable results, the GSA will need to determine conditions that would be significant and unreasonable even if they occur locally. Department staff note that the proposed definition of undesirable results could potentially lead to localized significant and unreasonable impacts within the Subbasin without them being considered undesirable results by the GSAs, and as a result, may end up being insufficiently protective of the interests of beneficial uses and users of groundwater in the Subbasin, including infrastructure features of concern identified by the GSA. Additionally, in reviewing the Department’s InSAR subsidence data, Department staff note that the subsidence rate has increased significantly in localized areas near Orland (up to 0.5 feet per year) and Arbuckle (up to 0.8 feet per year) between July 2021 and July 2023, and that a water-conveyance facility, the Tehama-Colusa Canal, runs through these areas. Department staff recommend the GSAs revise the definition of undesirable results to specifically identify and quantify of subsidence cause significant and unreasonable effects on beneficial uses and users of groundwater caused by land subsidence and define the

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<sup>92</sup> Colusa Subbasin GSP, Section 5.4.5.1, p. 293.

<sup>93</sup> Colusa Subbasin GSP, Section 5.4.5.1, pp. 292-293.

<sup>94</sup> Colusa Subbasin GSP, Figure 3-6, p.129.

narrowest geographic extent of basin conditions that could lead to such results (see [Corrective Action 3b](#)).

Because the legislative intent of SGMA is to avoid or minimize subsidence.<sup>95</sup> Considering the Subbasin has significant recent subsidence and contains infrastructure that the GSP identifies as susceptible to subsidence, that the GSAs should identify the total cumulative amount of subsidence that can occur without causing significant and unreasonable impacts to the beneficial uses and users of groundwater, surface land uses, and property interests, all of which must be clearly defined. The total cumulative amount of subsidence should consider the conditions necessary to minimize or halt subsidence during GSP implementation and maintain those conditions once sustainability has been achieved on or before 2042 (see [Corrective Action 3c](#)).

Additionally, the GSAs do not intend to assess exceedances of minimum thresholds until Sacramento Valley benchmarks are resurveyed and five years of subsidence has been measured. GSAs may use the Sacramento Valley benchmarks data, collected and made available through the Department's Ground Surface Displacement - Land Subsidence Monitoring program, but that monitoring program was not designed for and would not provide information sufficient to track subsidence for SGMA purposes. Despite this, the GSP does not provide any commitment to a monitoring schedule for the land subsidence network, which may lead to periods of more than five years without measurements to assess subsidence and the potential for undesirable results that may require responsive action. Because of the infrequent schedule of monitoring, the Sacramento Valley benchmark surveying network will not be sufficient to detect gradual changes in subsidence or identify the exceedance of minimum thresholds in time to prevent significant impacts to beneficial uses and users of groundwater. As such, the Plan's proposal to monitor subsidence would not provide the short-term information required by the GSP regulations.<sup>96</sup> Considering the Department provides quarterly updates for monthly InSAR subsidence data covering much of the Subbasin, the GSP does not address or explain why the GSAs have decided to not utilize this reliable data source to assess whether management is causing significant and unreasonable effects to surface land uses. Further, Department staff cannot conclude the GSP's proposed monitoring for subsidence during GSP Plan implementation is utilizing the best available information. The GSAs must provide a clear schedule for land subsidence monitoring and describe how the monitoring data will be evaluated to determine if undesirable results are occurring in the Subbasin (see [Corrective Action 3d](#)).

Under SGMA, subsidence must be minimized or eliminated. Given the occurrence and increasing rates of subsidence in the Colusa Subbasin, the GSP must include specific actions that will be taken to minimize subsidence (see [Corrective Action 3e](#)).

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<sup>95</sup> Water Code § 10720 (e).

<sup>96</sup> 23 CCR § 354.34(a).

### 3.3.3 Corrective Action 3

The GSAs must provide a more detailed explanation and justification regarding the selection of the sustainable management criteria, monitoring method, and projects or management actions related to land subsidence. Department staff recommend the GSAs consider and address the following:

- a. Identify facilities and/or structures, land uses and property interests that may be susceptible to impacts from land subsidence and should quantify the amount of land subsidence that would result in functional impacts to that infrastructure. The GSAs should describe the rationale and any analysis performed to inform the quantification of undesirable results in these areas. Provide maps and graphs showing the extent and rate of land subsidence in the basin at the minimum threshold.<sup>97</sup>
- b. Provide the information and criteria relied upon to establish and justify the minimum threshold.<sup>98</sup> Describe how the interests of beneficial uses and users may be affected if conditions reach minimum thresholds.<sup>99</sup>
- c. Revise the individual minimum thresholds to identify the rate and extent of land subsidence that substantially interferes with surface land uses and may lead to undesirable results. Identify a cumulative amount of tolerable subsidence that, if exceeded, would substantially interfere with groundwater and land surface beneficial uses and users in the Subbasin. The GSAs should also explain how the rate and extent of any future subsidence permitted in the Subbasin may interfere with surface land uses.
- d. Provide a clear schedule for more frequent land subsidence monitoring using the best available data and describe how the monitoring data will be evaluated to determine if undesirable results are occurring in the Subbasin. If the GSAs determine not to use available InSAR data, the GSAs should provide support and justification for why an alternative approach that excludes InSAR data is reasonable and uses the best available information.
- e. Provide specific details and schedule for projects or management actions that will be implemented to minimize or eliminate subsidence. The projects or management actions must be supported by best available information and science<sup>100</sup> and take into account the level of uncertainty associated with the Subbasin.<sup>101</sup>

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<sup>97</sup> 23 CCR § 354.28 (c)(5) *et seq.*

<sup>98</sup> 23 CCR § 354.28 (b)(1).

<sup>99</sup> 23 CCR § 354.28 (b)(4).

<sup>100</sup> 23 CCR § 354.44 (c).

<sup>101</sup> 23 CCR § 354.44 (d).

## **4 STAFF RECOMMENDATION**

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Department staff believe that the deficiencies identified in this assessment should preclude approval of the GSP for the Sacramento Valley – Colusa Subbasin. Department staff recommend that the GSP be determined incomplete.



# CALIFORNIA DEPARTMENT OF WATER RESOURCES SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

## Frequently Asked Questions: Incomplete Determinations & Next Steps

### Purpose

The purpose of this document is to answer questions about groundwater sustainability plan (GSP) assessments and help guide groundwater sustainability agencies (GSAs) through the process following the issuance of an incomplete GSP determination.

### Intended Audience

The intended audience of this document are GSAs in groundwater basins who received an incomplete determination for their GSPs.

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#### 1. What does an incomplete determination mean?

An incomplete determination means the deficiencies identified in a GSP were significant enough to preclude its approval. Once the incomplete determination is released, the GSAs have up to 180 days to address the deficiencies. Should the deficiencies be sufficiently corrected and the Department of Water Resources (DWR) determines the GSP approved, there may be additional recommended corrective actions to be addressed in the GSP's next periodic update.

#### 2. Can a meeting be requested to clarify and discuss the incomplete determination?

Meetings are conducted at the request of GSAs and should follow a GSA-prepared agenda to assure that DWR staff are focused on addressing the GSA's top priorities. For those basins that chose to submit multiple GSPs covering the basin, the basin's Point of Contact should initiate meetings with DWR staff.

#### 3. Who should the GSAs contact to set up meetings with DWR?

Each basin has a DWR Point of Contact who will assist in setting up meetings. You can find your basin's Point of Contact here: [Assistance and Engagement \(ca.gov\)](https://www.water.ca.gov/assistance-and-engagement). Please email your Point of Contact to set up a meeting with DWR staff.

#### 4. How many meetings can a GSA request?

One or two meetings may be conducted with DWR staff to discuss the GSA's understanding of the deficiencies. These meetings are intended to allow the basin's GSAs to develop a focused scope of work to correct the deficiencies within 180 days. Following these initial meetings, GSAs may schedule one or two check-in meetings with DWR staff

## Frequently Asked Questions: Incomplete Determinations & Next Steps

before submitting revised materials. These meetings should focus on progress and methodologies to address deficiencies and presentation of specific local challenges.

### 5. Will DWR let the GSAs know if their actions to modify the GSP will be sufficient?

Similar to the preparation of the submitted GSP, DWR staff will not provide a preliminary evaluation of written or revised documents intended to modify a GSP. However, DWR staff can discuss general approaches to address those deficiencies and provide feedback on the methodology used, and data relied upon, to support improved basinwide analyses.

### 6. How can a GSA correct the deficiencies identified in a GSP that has been determined incomplete by DWR?

The incomplete determination contains the deficiencies that DWR decided were significant enough to preclude its approval. The GSAs must address the deficiencies in a coordinated manner, consider the corrective actions, and make it clear that the corrections are part of the adopted GSP and will be incorporated into its implementation. GSAs must work locally to address the deficiencies openly and transparently. Incorporation of public input and participation is encouraged.

### 7. What materials does the GSA need to resubmit for DWR to review and reevaluate?

All documents provided to DWR must be uploaded to the SGMA Portal as part of the resubmission package within 180 days of the GSP's incomplete determination. The documents include, at minimum, the following:

- DWR requests both a clean version and a redline strikeout version of the corrected GSP be provided to help expedite its review of the changes and updates.
- The GSP Elements Guide should be updated and included to help DWR staff locate the changes addressing the deficiencies.
- The revised and resubmitted information should clearly state that the modifications are part of the adopted GSP and will be implemented accordingly.
- If the amended GSP has been readopted, the information supporting the readoption must also be uploaded to the SGMA Portal.
- If a coordination agreement is part of the basin's GSP and any information in that agreement has been modified, then the new coordination agreement, signed by all GSAs in the basin, must be uploaded to the SGMA Portal.

### 8. What is the timeline and method for submitting a corrected GSP that was initially issued an incomplete determination?

Following the release of a GSP's incomplete determination, the GSAs will have up to 180 days to submit the required information that addresses the identified deficiencies. GSAs must submit corrected GSPs to DWR on the SGMA Portal.

## Frequently Asked Questions: Incomplete Determinations & Next Steps

### 9. How should the GSAs adopt a corrected GSP?

The GSA's legal counsel should consider if readoption of the GSP is necessary under the authorities granted to the GSA during the initial GSP development. If a GSP must be readopted, the GSA may do so following a public hearing held at least 90 days after providing notice to cities and counties within the GSP area (see California Water Code §10728.4). This notification can be made very early in the process in anticipation that the GSP's revisions will be adopted within the 180-day period allowed to address the GSP's deficiencies.

### 10. After submittal of a corrected GSP, what is the timeline for DWR to review the GSP's adequacy?

There is no specific statutory timeline for DWR to complete its review of responses to an incomplete determination. However, once the GSA submits its corrected GSP, DWR staff will work expeditiously to review the corrected GSP and determine if the GSP is either approved or inadequate. DWR will host a public comment period on the resubmitted GSP for consideration in its reevaluation and reassessment.

### 11. What happens if a GSA cannot correct deficiencies within 180 days?

If a GSA does not submit a corrected GSP within 180 days, or DWR determines that the corrected GSP does not sufficiently address the previously defined deficiencies, DWR will enter into consultation with the State Water Resources Control Board prior to determining a GSP inadequate. The State Water Resources Control Board can step in using a process called State intervention, which is described in detail under SGMA Chapter 11 (California Water Code §10735 *et seq.*). For additional questions on State Intervention, please contact the State Water Resources Control Board at: [SGMA@waterboards.ca.gov](mailto:SGMA@waterboards.ca.gov).



## 9. COLUSA SUBBASIN GROUNDWATER SUSTAINABILTY PLAN IMPLEMENTATION

- a. Receive an update on Colusa Subbasin Groundwater Sustainability Plan implementation activities.

Staff will provide an update on Colusa Subbasin GSP implementation activities.

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## 10. TECHNICAL ADVISORY COMMITTEE VACANCY

- a. Receive update on Technical Advisory Committee (TAC) recruitment.
- b. \*Consider appointment of Shasta Banchio to the GGA TAC.

At the September 12, 2023 meeting, the Board discussed the TAC vacancy and a potential path forward. Shasta Banchio, Assistant Engineer with Glenn-Colusa Irrigation District, has submitted a letter of interest expressing a desire to participate on the GGA TAC.

In January 2019, the GGA Board approved a document outlining the TAC Composition and Selection Process. The Board desired the member composition that contained the following:

- Technical background that knows and works in the area.
- Members would likely be member agency managers and/or member agency technical staff.
- Members will represent diverse geographic areas and types of groundwater users.

### Attachments

- Letter of Interest- Shasta Banchio



GLENN-COLUSA IRRIGATION DISTRICT

BOARD OF DIRECTORS

John Amaro, President Logan Dennis, Vice President
Donald R. Bransford Peter Knight Blake Vann

October 6, 2023

Glenn Groundwater Authority
ATTN: Lisa Hunter
225 N. Tehama St.
Willows, CA 95988

Subject: Technical Advisory Committee Addition

Dear Glenn Groundwater Authority (GGA) Board Members:

This letter is to express my interest in being a member of the GGA Technical Advisory Committee (TAC).

As an Assistant Engineer at Glenn-Colusa Irrigation District (GCID), the relationship of this membership would be beneficial for the groundwater authorities as well as GCID. Being a Cal Poly San Luis Obispo graduate from the BioResource and Agricultural Engineering Department, I bring a new perspective to today's agricultural needs with a sustainable outlook. I look forward to seeing the positive changes we can make as an industry in implementing the Sustainable Groundwater Management Act as well as keeping agriculture at the forefront.

I look forward to the TAC's decision to include me as a possible member of the committee.

Sincerely,

Shasta Banchio

Shasta Banchio
Assistant Engineer



Protecting agriculture and wildlife in the Sacramento Valley for more than a century

## 11. COMMITTEE UPDATES

- a. Executive Committee
  - i. CGA/GGA Joint Executive Committee
- b. Fee Study Ad Hoc Committee
- c. Groundwater Recharge Pilot Project Ad Hoc Committee
- d. Technical Advisory Committee

The **GGA Executive Committee** last met July 27, 2022. The CGA/GGA Joint Executive Committee met January 28, 2022. The next GGA Executive Committee meeting has not been scheduled.

Committee Members: John Amaro, Matt Deadmond, Gary Hansen

The **Fee Study Ad Hoc Committee** last met November 7, 2023. The committee received a briefing from the consultant team. The committee will continue to work on tasks and report progress and bring updates and recommendations to the GGA Board.

Committee Members: John Amaro, Grant Carmon, Mark Lohse

The **Groundwater Recharge Pilot Project Ad Hoc Committee** last met August 7, 2023 to continue to work with the consultant team (Geosyntec/Water and Land Solutions) on groundwater recharge. Outcomes of that meeting were shared at the August 14, 2023 meeting. The committee is scheduled to meet November 15, 2023.

Committee Members: Emil Cavagnolo, Matt Deadmond, Chuck Schonauer, Bruce Roundy, Gary Enos

The **Technical Advisory Committee (TAC)** met jointly with the Colusa Groundwater Authority (CGA) Technical Advisory Committee on August 11, 2023. The outcomes of the meeting were shared at the August 14 and September 12, 2023 meetings.

The next CGA/GGA Joint TAC meeting is scheduled for December 1, 2023.

Full page slides of TAC presentations and other meeting materials are available on the GGA website at:

<https://www.countyofglenn.net/dept/planning-community-development-services/water-resources/glenn-groundwater-authority/gga>

Committee Members: Tavis Beynon, Matt Deadmond, Emil Cavagnolo, Mark Lohse, Don Bills, Vacancy

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## 12. CLOSED SESSION

Gov't Code §54956.9 – Conference with Legal Counsel – Anticipated or significant exposure to litigation regarding tax refund claims and challenges to previously adopted property related fees.

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## 13. CLOSED SESSION

Gov't Code §54956.9 – Conference with Legal Counsel – Existing Litigation  
Aqualliance, California Water Impact Network, and California Sportfishing Alliance vs. Colusa Groundwater Authority, Glenn Groundwater Authority  
Colusa County Superior Court - Case Number CV24584

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#### **14. REPORT OUT FROM CLOSED SESSION**

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#### **15. MEMBER REPORTS AND COMMENTS**

Members of the GGA Board are encouraged to share information, reports, comments, and suggest future agenda items. Action cannot be taken on items brought up under this item.

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#### **16. NEXT MEETING**

The next regular meeting is scheduled for December 12, 2023 at 1:30 p.m.

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#### **17. ADJOURN**

The meeting will be adjourned.

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\*Indicates Action Item