Corning Sub-basin GSA Committee Meeting Materials

December 8, 2021 | 9:30 am

Glenn-Colusa Irrigation District Main Pump Station
7854 County Road 203, Orland, CA 95963
And
Teleconference

Zoom Information **Join Zoom Meeting by computer, smartphone, or tablet at:** **https://cbuilding.zoom.us/j/94856971846** **One tap mobile** **+16699006833,,94856971846# US (San Jose)**	Join by phone: **+1 669 900 6833 US** **833 548 0282 US Toll-free** **Meeting ID: 948 5697 1846** **Find your local number:** **https://cbuilding.zoom.us/u/ay20nvllX**

1. **Call to Order**

   The Chair will call the meeting to order.

2. **Roll Call**

   Staff will conduct roll call.

3. **AB 361 Open Meetings: State and Local Agencies: Teleconferences**

   a. ***Discuss and consider approval of Resolution 2021-02 Authorizing Remote Teleconference Meetings in Accordance with Government Code Section 54953 (e)**

   Executive Order N-08-21 was issued on June 11, 2021 which provided guidance on a number of orders that were issued in relation to COVID-19. One change applied to Executive Order N-29-20 (issued March 17, 2020) relating to Open Meetings and teleconferencing stating the provisions of N-29-20 would apply through September 30, 2021.

   On September 16, 2021, Governor Newsom approved Assembly Bill 361 relating to Open Meetings and teleconferencing requirements.

   On October 13, 2021, staff and members discussed options and potential implications of the expiration of Executive Order N-29-20 and passage of AB 361. The CSGSA approved Resolution No. 2021-01 Authorizing Remote Teleconference

Meetings in Accordance with Government Code Section 54953 (e). A Resolution must be passed every 30 days to remain effective.

Attachments:

- Resolution 2021-02 Authorizing Remote Teleconference Meeting in Accordance with Government Code Section 54953 (e)

RESOLUTION NO. 2021-02

A RESOLUTION OF THE CORNING SUB-BASIN GROUNDWATER SUSTAINABILITY AGENCY AUTHORIZING REMOTE TELECONFERENCE MEETINGS IN ACCORDANCE WITH GOVERNMENT CODE SECTION 54953(e)

WHEREAS, the Corning Sub-basin Groundwater Sustainability Agency (CSGSA) recognizes the importance of transparency and clear communication in government, and is committed to full compliance with the letter and spirit of the Ralph M. Brown Act (Gov. Code, §§ 54950 – 54963) (hereinafter "Brown Act"); and

WHEREAS, all meetings of the CSGSA Committee are open and public, as required by the Brown Act, so that any member of the public may attend and participate; and

WHEREAS, the Brown Act, (Gov. Code, § 54953, subd. (e)), allows members of a legislative body to participate in meetings remotely, without compliance with the requirements of Government Code section 54953, subdivision (b)(3), if a state of emergency is proclaimed pursuant to Government Code section 8625 and state or local officials have imposed or recommended measures to promote social distancing, or meeting in person would present imminent risks to the health and safety of attendees; and

WHEREAS, on March 4, 2020 Governor Gavin Newsom proclaimed a State of Emergency to exist in the State of California as a result of the threat of COVID-19; and

WHEREAS, COVID-19 cases and hospitalizations continue to increase in Glenn County due primarily to the Delta variant of the virus that causes COVID-19, which is more transmissible than prior variants, may cause more severe illness, and that even fully vaccinated individuals can spread to others; and

WHEREAS, the CSGSA wishes to authorize remote teleconference meetings pursuant to Government Code section 54953(e).

NOW, THEREFORE, BE IT RESOLVED by the Corning Sub-basin Groundwater Sustainability Agency Committee as follows:

1. The Recitals set forth above are true and correct and are incorporated into this Resolution by this reference.

2. The Corning Sub-basin Groundwater Sustainability Agency Committee does hereby find that a State of Emergency was proclaimed by Governor Gavin Newsom pursuant to Government Code section 8625 on March 4, 2020 and remains active.

3. The Corning Sub-basin Groundwater Sustainability Agency Committee does hereby find that given the continued increase of COVID-19 cases and hospitalizations in Glenn County due to the Delta variant, conditions exist

which pose imminent risks to the health and safety those attending meetings of the Corning Sub-basin Groundwater Sustainability Agency Committee.

4. The staff are hereby authorized and directed to take all actions necessary to carry out the intent and purpose of this Resolution including, conducting open and public meetings in accordance with Government Code section 54953, subdivision (e), and other applicable provisions of the Brown Act.

5. This Resolution shall take effect immediately upon its adoption and shall be effective until the earlier of (i) January 7, 2022, or (ii) such time as the Corning Sub-basin Groundwater Sustainability Agency adopts a subsequent resolution in accordance with Government Code section 54953, subdivision (e)(3), to extend the time during which the Corning Sub-basin Groundwater Sustainability Agency Committee may continue to meet remotely without compliance with the requirements of Government Code section 54953, subdivision (b)(3).

PASSED, APPROVED, AND ADOPTED at a regular meeting of the Corning Sub-basin Groundwater Sustainability Agency Committee on December 8, 2021 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
John Amaro
Chairman
Corning Sub-basin Groundwater
Sustainability Agency

ATTEST:

_____
Lisa Hunter
Glenn County Staff
Corning Sub-basin Groundwater Sustainability Agency

4. Meeting Minutes

    a. *Approval of October 13, 2021, Meeting Minutes

    Draft meeting minutes are attached.

    Attachments:

    - October 13, 2021, draft meeting minutes

Corning Sub-basin GSA Committee
Meeting Minutes

October 13, 2021, | 9:30 am
Glenn-Colusa Irrigation District Main Pump Station
7854 County Road 203, Orland, CA 95963
And
Teleconference

1. **Call to Order**
   John Amaro called the meeting to order at 9:34 am.

2. **Roll Call**

	Party Representative	Member Agency
X	Tom Arnold	County of Glenn
X	Grant Carmon	County of Glenn
X	John Amaro	Glenn-Colusa Irrigation District
X	Pete Knight	Glenn-Colusa Irrigation District
	Julia Violich	Monroeville Water District
	Seth Fiack	Monroeville Water District

   Lisa Hunter conducted roll call. As noted above, a quorum of members was present.

3. **Meeting Minutes**
   a. ***Approval of September 8, 2021, Meeting Minutes**

   A motion was made by Grant Carmon to approve the September 8, 2021 meeting minutes as presented. The motion was seconded by Pete Knight and passed unanimously.

   Motion: Grant Carmon; Second: Pete Knight; Vote: Unanimous (4-0)

4. **Period of Public Comment**
   No comments were heard.

5. AB 361 Open Meetings: State and Local Agencies: Teleconferences
    a. *Discuss and consider approval of Resolution 2021-01 Authorizing Remote Teleconference Meetings in Accordance with Government Code Section 54953 (e)

Holly Dawley provided an overview of the provisions to allow teleconference meetings for meetings falling under the Brown Act requirements in light of COVID-19 health and safety concerns. The Executive Order authorizing virtual meetings expired on September 30, 2021. AB 361 was passed with allows a continuation of virtual meetings provided that a board approve a resolution authorizing virtual meetings. Certain conditions must be met and the resolution must be renewed every 30 days.

A motion was made Tom Arnold to approve Resolution 2021-01 Authorizing Remote Teleconference Meetings per Government Code Section 54953 (e). The motion was seconded by Grant Carmon and passed unanimously.

Motion: Tom Arnold; Second: Grant Carmon; Vote: Unanimous (4-0)

6. Staff Reports

Ms. Hunter provided the status of the Facilitation Support Services (FSS) contract: Consensus Building Institute (CBI) will be able to provide services through the Groundwater Sustainability Plan (GSP) submittal. CBI will also be able to facilitate one Advisory Board meeting and support two Corning Sub-basin GSA meetings, including this one.

Ms. Hunter reported that the first SGMA Annual Report is due on April 1, 2022.

Ms. Hunter outlined that potential options for funding would be included in the Corning Subbasin GSP; however, no decisions on funding mechanisms have been made. She provided some examples of funding needs that the CSGSA will need to discuss. She encouraged early engagement in funding conversations including the funding mechanism, refinement, and requirements.

Mr. Carmon inquired about grant funding for the SGMA Annual Report in 2022 and alternatives if grant funding was not available. Ms. Hunter anticipates that funding the first report, which covers the entire basin, will be included in the grant agreement amendment request and will either receive funding through the grant or the cost will be shared by the GSAs. The details remain to be worked out. She was optimistic because early discussion with DWR had been positive and similar tasks have been approved for other GSAs. Ms. Hunter noted that she requested Montgomery & Associates to present a scope of work for the Annual Report.

Mr. Amaro commented he favored establishing a single organization to be the point of contact for the GSA and be responsible for general operations and coordinating division of duties.

7. Corning Subbasin Advisory Board Report

Ms. Hunter shared that the Corning Subbasin Advisory Board (CSAB) last met in September and will meet again in November of this year. She reported that a public in-person workshop on October 4 and a webinar on October 13 substituted for the Advisory Board meeting.

8. Groundwater Sustainability Plan Update and Discussion

a. Review GSP schedule adoption process

The draft Corning Subbasin Groundwater Sustainability Plan (GSP) was released on September 10, 2021. The draft GSP is available on the website at: https://www.corningsubbasingsp.org/. A printed copy is available for public viewing at the Glenn County Planning and Community Development Office, 225 N Tehama St, Willows, CA 95988.

Committees, Boards, and member agencies are encouraged to review the full GSP with decision makers to make sure any concerns or comments can be incorporated prior to finalization for adoption. The goal is to avoid delays in the process that limit the GSAs' ability to meet the statutory deadline.

b. Public Review Draft Groundwater Sustainability Plan comment period and public input

The draft Corning Subbasin GSP comment period ends on October 25, 2021. Comments may be mailed, emailed, or submitted in another format, but the most effective method is to use the comment form that can be found on the website or emailed upon request.

The consultant (Montgomery & Associates) will compile comments in November, and the CSGSA Committee will vote on the final GSP in early December. Ms. Hunter encouraged members to obtain authorization, if needed, from their agency to approve the GSP prior to attending the December CSGSA meeting and to request a presentation of the draft GSP if helpful or necessary.

c. Outreach and engagement update

Outreach efforts include an in-person public workshop on October 4 and a webinar on October 13.

9. Corning Sub-basin GSA Committee Member Reports and Comments

Mr. Carmon shared that 210-215 dry wells have been reported in Glenn County and the City of Orland has received a grant in the amount of approximately $8 million for new municipal wells, storage tanks, and hook ups to residents within the County area that are within the sphere of influence to the City's system. A community meeting will

be held October 14 at 6:00 pm. North Valley Community Foundation is administering a grant to provide water tanks and deliveries for the tanks, as well as drinking water deliveries of 60 gallons per month per household. A representative will be at the community meeting to provide additional information to interested individuals. The Drought Task Force meeting will be held October 14 at 3:00 pm.

A member of the public commended the staff on its plan to hold both in-person and virtual sessions for the public meetings in October.

10. Next Meeting

The next meeting will be November 10, 2021 at 9:30 am.

11. Adjourn

The meeting adjourned at 10:02 a.m.

5. Period of Public Comment

Members of the public are encouraged to address the Corning Sub-basin GSA Committee. Public comment will be limited to three minutes. No action will be taken on items under public comment.

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6. 9:30 am Public Hearing: Adoption of the Corning Subbasin Groundwater Sustainability Plan

    a. Conduct a Public Hearing to receive public comments on the Corning Subbasin Groundwater Sustainability Plan

    b. *Consider approving the Corning Subbasin Advisory Board recommendation to adopt the Corning Subbasin Groundwater Sustainability Plan

In September 2014, the California Legislature enacted the Sustainable Groundwater Management Act (SGMA) to require sustainable groundwater management statewide. SGMA applies to all high and medium priority groundwater basins as determined by the Department of Water Resources. Implementation of SGMA is achieved through the formation of Groundwater Sustainability Agencies (GSAs) and the preparation and implementation of Groundwater Sustainability Plans (GSPs). GSPs for all high and medium priority basins, including the Corning Subbasin, must be submitted to the Department of Water Resources by January 31, 2022.

The Corning Sub-basin GSA (CSGSA) was formed in 2017 through a Memorandum of Agreement (MOA) between Glenn County and Glenn-Colusa Irrigation District to be the GSA for the Glenn County portion of the Corning Subbasin. In 2020, the MOA was amended to include the Monroeville Water District. On January 7, 2020, the CSGSA approved a Memorandum of Understanding (MOU) to coordinate with the Tehama County Flood Control and Water Conservation District (TCFCWCD) GSA with a primary purpose of developing a single GSP for the Corning Subbasin. The MOU also formed the Corning Subbasin Advisory Board (CSAB), which is composed of members representing both the CSGSA and the TCFCWCD, in part to provide a venue for public participation in the SGMA process and to advise the GSAs on matters related to the development and implementation of the GSP.

Pursuant to Water Code section 10728.4, a notice was sent on August 27, 2021 to cities and counties within the area of the proposed plan. As a result, two consultation meetings were held with the City of Corning and a presentation was made to the Corning City Council by TCFCWCD staff.

Draft sections of the GSP were reviewed by the CSAB and posted to the website as they were developed to provide ample opportunity for comments. A complete draft GSP was prepared and released for a public review period beginning September 10, 2021 and ending October 25, 2021. A printed copy of the draft GSP was available for public review at the Planning and Community Development Services Agency lobby

located at 225 North Tehama Street in Willows. An in-person public meeting was held on October 4, 2021 and a webinar held on October 13, 2021 to provide an overview of the draft GSP and to hear public comments. Regular updates on GSP development have been provided at CSGSA meetings.

The Corning Subbasin Groundwater Sustainability Plan is being presented for consideration of adoption. The Corning Subbasin GSP is located online at: https://www.corningsubbasingsp.org/finalgsp. A printed copy is available for review at the Planning and Community Development Services Agency located at 225 North Tehama Street, Willows, CA 95988.

The Corning Subbasin GSP considers input from staff, GSA members, Corning Subbasin Advisory Board members, and members of the public. Input was received at Corning Subbasin Advisory Board meetings, public workshops, and through feedback received during public comment periods on initial draft GSP chapters.

On November 10, 2021, the CSAB recommended the GSAs adopt the Corning Subbasin GSP.

Materials from the November 10, 2021 CSAB meeting can be found attached to Item 8. Materials include presentation slides, Corning Subbasin GSP public comments received, and the public workshops summary.

Following adoption by the two GSAs, staff will work with the consultant team who will lead the effort to submit the Corning Subbasin GSP to the Department of Water Resources.

Attachments:

- 90-day notice to cities and counties
- Legal Notice: newspaper publication

CORNING SUB-BASIN GSA

County of Glenn
Glenn-Colusa Irrigation District
Monroeville Water District

August 27, 2021

City of Corning
794 Third Street
Corning, CA 96021

RE: Corning Subbasin Groundwater Sustainability Plan

Dear Honorable City Council,

The Corning Sub-basin Groundwater Sustainability Agency (CSGSA), in conjunction with the Tehama County Flood Control and Water Conservation District, is preparing a draft Groundwater Sustainability Plan (GSP) for the Corning Subbasin, as required by the Sustainable Groundwater Management Act (SGMA).

Water Code § 10728.4. reads in part:

> *A groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The groundwater sustainability agency shall review and consider comments from any city or county that receives notice pursuant to this section and shall consult with a city or county that requests consultation within 30 days of the receipt of the notice.*

PLEASE TAKE NOTICE that the CSGSA will hold a Public Hearing in December 2021 to consider adopting the GSP for the Corning Subbasin.

Pursuant to SGMA, representatives of the CSGSA are available to provide consultation with, and receive comments on the GSP from your organization should consultation be requested. Comments may also be provided in writing during the public comment period beginning on September 10, 2021 and continue for 45 days closing on October 22, 2021.

Components of the plan and the complete plan, when available, may be reviewed at the Corning Subbasin GSP website at: https://www.corningsubbasingsp.org/

Consultations can be arranged, or questions can be answered by contacting Lisa Hunter, Glenn County Water Resources Coordinator, at lhunter@countyofglenn.net or by phone at 530-934-6540.

Sincerely,

Lisa Hunter
Glenn County Water Resource Coordinator

CORNING SUB-BASIN GSA

County of Glenn
Glenn-Colusa Irrigation District
Monroeville Water District

August 27, 2021

County of Tehama
P.O. Box 250
Red Bluff, CA 96080

RE: Corning Subbasin Groundwater Sustainability Plan

Dear Honorable Board of Supervisors,

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Sincerely,

Lisa Hunter
Glenn County Water Resource Coordinator

CORNING SUB-BASIN GSA

County of Glenn
Glenn-Colusa Irrigation District
Monroeville Water District

August 27, 2021

County of Glenn
525 West Sycamore Street, Suite B1
Willows, CA 95988

RE: Corning Subbasin Groundwater Sustainability Plan

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Consultations can be arranged, or questions can be answered by contacting Lisa Hunter, Glenn County Water Resources Coordinator, at lhunter@countyofglenn.net or by phone at 530-934-6540.

Sincerely,

Lisa Hunter
Glenn County Water Resource Coordinator

Cc: Scott DeMoss, CAO

Published in the Sacramento Valley Mirror
11/20/21 and 11/27/21

NOTICE OF PUBLIC HEARING FOR ADOPTION OF THE GROUNDWATER SUSTAINABILITY PLAN BY THE CORNING SUB-BASIN GROUNDWATER SUSTAINABILITY AGENCY COMMITTEE IN THE CORNING SUBBASIN

Notice is hereby given, pursuant to Water Code section 10728.4 and Government Code section 6066, the Corning Sub-basin Groundwater Sustainability Agency Committee shall hold a public hearing both in person at 7854 County Road 203, Orland, CA 95963, as well as via teleconference at 9:30 AM on December 8, 2021 to consider adoption of the Corning Subbasin Groundwater Sustainability Plan (GSP). The GSP was developed pursuant to the Sustainable Groundwater Management Act (CA Water Code, Section 10720 et seq.) for the Corning Subbasin (Groundwater Subbasin Number: 5-021.51) and provides information regarding the subbasin geology, hydrology and water supplies; the formation of Groundwater Sustainability Agencies; establishment of sustainable management criteria and monitoring networks; and programs and projects to be developed and implemented to achieve groundwater sustainability by 2042. Comments received prior to and during the public hearing will be considered by the Corning Sub-basin Groundwater Sustainability Agency Committee prior to adoption of the proposed GSP. A copy of the Final GSP will be located online by December 2, 2021 at: https://www.corningsubbasingsp.org/. A printed copy will be available for public review during regular business hours by December 2, 2021 at 225 North Tehama Street, Willows, CA 95988.

7. Staff Reports

Staff from members of the Corning Sub-basin GSA will provide relevant updates, such as a brief status update of GSP development, grant agreement, and project agreement. Reminders and clarifications may be made, and direction may be provided to staff.

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8. Corning Subbasin Advisory Board Report

The Corning Subbasin Advisory Board (CSAB) last met on November 10, 2021. The CSAB received an overview of comments received on the draft GSP during the public comment period and public workshops and the refinements to the GSP as a result of those comments. The CSAB approved to recommend the GSP for adoption by the GSA Boards. The CSAB also reviewed the near-term activities and activities for GSP implementation.

CSAB meeting materials, including presentations, agendas, and meeting summaries are available on the website at: www.corningsubbasingsp.org.

Advisory Board members may provide additional updates.

Attachments:

- November 10, 2021 CSAB Presentation Slides
- Public Workshops Summary
- Corning Subbasin GSP Public Comments
- GSP Development Schedule


Corning Subbasin
Groundwater Sustainability Plan
Technical Presentation
Presented to Corning Subbasin Advisory Board
11/10/2021 | Corning City Council Chambers and
Teleconference
Prepared by
MONTGOMERY
& ASSOCIATES


Agenda and Meeting Objective
AGENDA
Review overall public comments received on Public Draft GSP
Review general types of responses
Review minor revisions to draft GSP to respond to comments
Next steps for GSP adoption and implementation
MEETING OBJECTIVE
Recommend Adoption of GSP by GSA Boards
11/4/2021
2

Comments Received on Public Draft GSP

MONTGOMERY & ASSOCIATES

Reminder: Comments and Input received on Draft GSP Sections while being drafted

- Direct outreach for data and technical feedback:
  - Water Districts, Orland Unit Water Users Association, Stony Creek Watermaster, County RCDs, City of Corning, Cal Water/Hamilton City
- Public comments at CSAB meetings
- Direct comments to GSAs on each section by CSAB and stakeholders
- Unsolicited public input to GSAs on various items – passed on to CSAB and taken into consideration while drafting GSP

MONTGOMERY & ASSOCIATES

Summary of Public Comments Received on Draft GSP

- General feedback, comments, and questions received and answered at the two public workshops
- 15 individual comment letters/spreadsheets/e-mails received totaling approximately 200 specific comments on the different GSP sections
- Variety of comments from federal agencies, Tribes, local agencies/districts, NGOs, agricultural interests, and individual stakeholders and landowners on all sections of the GSP
- Generally wanted additional clarification on some parts of the GSP, requested changes to SMC, and requested more coordination with certain interest groups
- None of the comments require huge changes to draft GSP

Materials in Meeting Packet:
- Summary of public comments and discussion at two Public Workshops
- List of all public comments received during 45-day comment period

MONTGOMERY & ASSOCIATES

11/4/2021

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Summary of Public Comments Received on Draft GSP (cont.)

Commenter/Affiliation	Approx Number of Comments	Main Comment Topics
Landowners, stakeholders	7 individual commenters, approx. 140 comments	Funding, communication and outreach, protection of domestic wells, projects and actions, general clarifications and edits
Agricultural interest group	3	SMC: minimum thresholds
Paskenta Band of Nomlaki Indians	30	Tribal water rights, coordination with the tribe, clarifications on GSP
Local agencies, districts	3 individual commenters, 8 comments	Projects and funding, 1 letter of support
NGO Consortium	30	Protection of all beneficial users, GDEs, Human Right to Water, Public Trust Doctrine, SMC
US National Marine Fisheries Service (NMFS)	5	SW/GW interaction analysis and SMC; floodplain projects
US Bureau of Indian Affairs (BIA)	1	Tribal water rights/GW in storage

Landowner and Stakeholder Comments/Responses

- **Funding concerns**: reiterate in response to comments that this topic will be further addressed during early stages of implementation, no funding decisions have been made yet
- **Communications with westside landowners and engaging domestic well owners**: GSAs are committed to improving communications with these groups
- **Concerns about minimum thresholds not being protective enough of domestic well owners**.
  - *Response: all beneficial users were considered and the SMC were discussed at a number of CSAB public meetings. Revisions to SMC can be made in future updates to consider the latest data and analysis.*
- **Implementation of GSP**: Provide clarification on various aspects
- **Detailed comments on editorial or descriptive aspects of GSP**: will revise as appropriate
- **Comments provided additional input from local stakeholders and landowners:** concerns raised will be considered during GSP implementation

MONTGOMERY & ASSOCIATES

Agricultural Interest Group Comments/Responses

- Deseret Farms of California
  - 3 comments pertaining to SMC Section 6
  - **Commented on approach to identify similar areas for developing minimum thresholds:** provided clarifications in the response
  - **Comment on establishing management zones:** provided clarification that currently management zones or areas were not deemed necessary
  - **Commented that the Measurable Objectives and Minimum Thresholds are "beyond what is required to achieve the GSA's sustainability goal for the basin" – further requested that the MOs and MTs be revised.**
    - Response: *all beneficial users were considered and the SMC were discussed at a number of CSAB public meetings. Revisions to SMC can be made in future updates to consider the latest data and analysis.*

MONTGOMERY & ASSOCIATES

Paskenta Band Of Nomlaki Indians Comments/Responses

- **Stated discussion of Tribal Water Rights was missing in the GSP**: added text to include this information in the Plan Area Section
- **Requested additional coordination during GSP implementation**: GSAs have started re-engaging more with the tribe
- **Requested adding Tribe wherever stakeholder and agency coordination was mentioned**: this was added
- **Mentioned that they are *developing their own groundwater monitoring and management plans*.** *"The Tribe may share details of these plans with the GSAs at a suitable time and provide coordination with the GSP".*
- **Provided comments from an external technical consultant who reviewed the GSP** :
  - Provided responses to clarify aspects of SGMA
  - Some comments helped provide clarifications that were included in the GSP

MONTGOMERY & ASSOCIATES

11/4/2021

9

Example addition of Tribes in all aspects of GSP stakeholder coordination

- Section 6 Sustainability Goal:

The goal of the Groundwater Sustainability Plan is to ensure sufficient and affordable water of good quality be available on a sustainable basis to meet the unique needs of agricultural, residential, municipal, industrial, recreational, tribal and environmental users within the Corning Subbasin, both now and in the future. The GSAs recognize that sustainability can only be possible with the support of the public and coordination of local, state, tribal and federal agencies and the utilization of both surface and groundwater resources

MONTGOMERY & ASSOCIATES

11/4/2021

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Local Agency Comments/Responses

- City of Corning:
  - Held 2 consultations to review GSP items pertinent to the City
  - **Comments on Projects relevant to the City**: made some revisions to the text to incorporate their comments
  - **Requested some revisions to language in Section 8 Implementation**: GSAs are reviewing and will incorporate as applicable
- Glenn County Farm Bureau:
  - **Concerns about fees for dry-land owners, and their inadequate representation on the CSAB**
- Glenn Colusa Irrigation District:
  - **Provided a comment letter supporting the adoption of the GSP by the GSAs to meet the January 31, 2022 deadline for submittal to DWR.**
  - **Expressed concern about groundwater surface water interactions quantification and potential future impacts.**

MONTGOMERY & ASSOCIATES

11/4/2021

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NGO Consortium Comments/Responses

(Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)

- *Beneficial uses and users are not sufficiently considered in GSP development.*
  - *Human Right to Water considerations are not sufficiently incorporated.*
  - *Public trust resources are not sufficiently considered.*
  - *Impacts of Minimum Thresholds, Measurable Objectives and Undesirable Results on beneficial uses and users are not sufficiently analyzed.*
- *Climate change is not sufficiently considered.*
- *Data gaps are not sufficiently identified and the GSP needs additional plans to eliminate them.*
- *Projects and Management Actions do not sufficiently consider potential impacts or benefits to beneficial uses and users.*

MONTGOMERY & ASSOCIATES

11/4/2021

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NGO Consortium comments/Responses

- Similar to typical letters sent to other GSAs on their Draft GSPs
- Many general comments not completely applicable or specific to this GSP
  - Focused GSA responses on comments with specific recommendations
  - Some comments provided helpful information to be added
- Responses provide clarifications to where in the GSP particular information is presented, and how the GSP meets the regulations.
  - A few revisions to GSP sections are incorporated for completeness and clarification
  - A few additional analysis details can be developed during GSP implementation and added to the 5-year GSP update. **These items would not prevent the GSP from being approved by DWR**.

Federal Agency (NMFS, BIA) Comments/Responses

- NMFS:
  - Similar to typical letters sent to other GSAs on their Draft GSPs
  - Commented on June 2021 Section 6 draft, not the Public Review Draft GSP; did not review Section 3, which presents model results applicable to their SW/GW interaction comment
  - **Commented on the identification of endangered species, inadequacy of minimum thresholds to protect streamflows from depletion and fish species, and recommendation for future projects and management actions**
    - Responses point to appropriate sections where analysis is described and the need to balance the needs for all beneficial users in the Subbasin – future monitoring and projects and actions will be considered
- BIA:
  - **Commented on model uncertainties and the characterization of groundwater volume in storage in the aquifer**; will provide clarifications

Conclusion: the revised GSP is a defensible and complete document ready to be finalized, adopted, and submitted by January 2022

All comments were reviewed and considered. Responses are being developed and will be attached to the Final GSP along with the letters received. The GSP is being revised slightly to help clarify issues and add missing items.

- This GSP is complete and meets SGMA Legislation and GSP Regulations requirements
- No policy changes required at this time – this will be reviewed during implementation as new data come in and the analysis is refined
- Comments provided good inputs on some items that needed to be clarified
- Some comments required better explanation, which was provided in a response format
- Some comments pointed to items that need to be considered for GSP implementation and additional analysis for GSP 5-year assessments
- All comments and responses will be documented as a new Appendix in the GSP

Note: the full table of comments is included in the meeting packet and posted on the GSP website.

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11/4/2021

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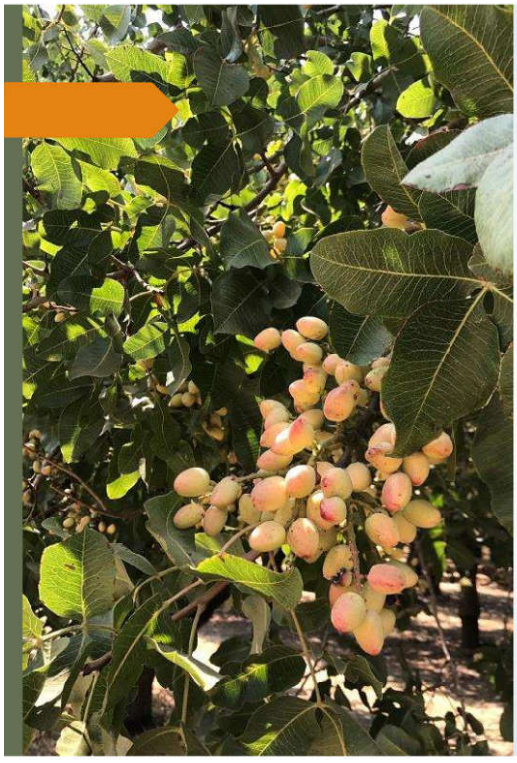
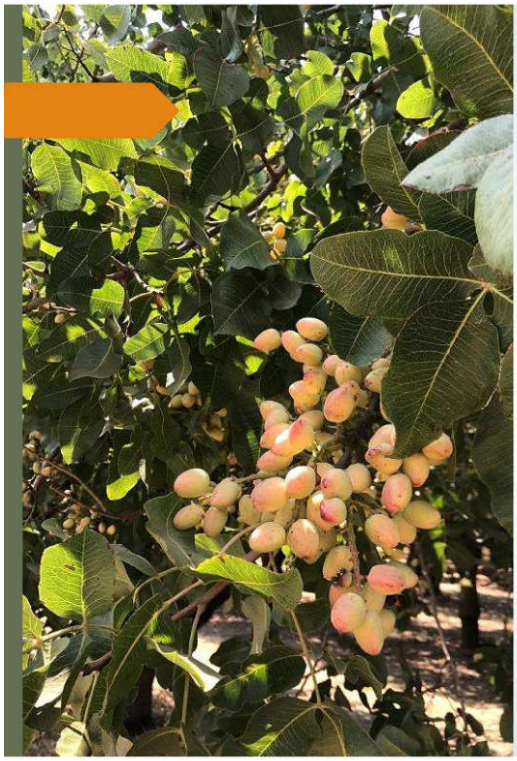


Remaining Questions and Comments on Draft GSP?

- GSA Staff remarks
- CSAB feedback
- Public comment

11/4/2021

16



Potential Action Item

- **Recommend Adoption of GSP by GSA Boards**

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Next Steps for GSP Adoption and Implementation

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Schedule of Activities

- **First two weeks of October**: public workshops - ***completed***
- **October 25 - November 5 2021**: incorporate public comments and finalize GSP - ***ongoing***
- **November 10**: CSAB meeting to review public comments incorporation and for CSAB to vote on recommendation to adopt Final GSP
- **December 2021**: GSA Boards hold public hearings for GSP adoption
  - Tehama Groundwater Commission meets **Dec. 8** to consider adoption and could make a recommendation to the Tehama GSA Board which meets **Dec. 20** and could adopt GSP at that meeting
  - CSGSA meets **Dec. 8** and could adopt the GSP at that meeting
- **By January 31, 2022**: submit final adopted GSP to DWR
- **By February 2022**: start implementing the GSP as soon as it is adopted
- **By April 1, 2022**: submit first annual report to DWR

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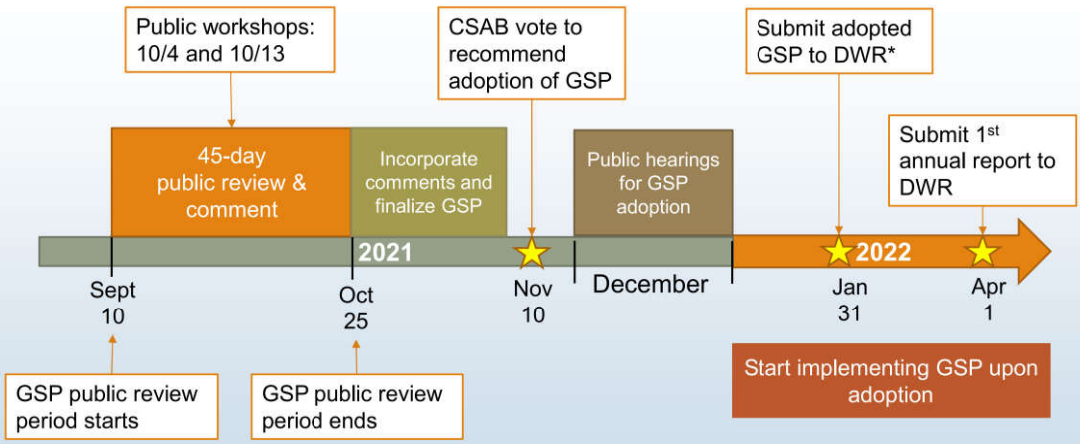
Timeline Recap

Stay involved! Additional current and upcoming discussion topics include:
- Long-term funding discussions
- Projects, coordination, and partnerships
- Monitoring and addressing data gaps



**Jan 31 - DWR will post GSP to SGMA website and open for official public comment period (60 days) – DWR has 2 years to review the GSP and provide assessment.*

What to Expect During GSP Implementation

- **GSA Governance**:
  - Review MOU/MOA
  - Subbasin GSA Coordination
  - Budget Planning and Funding Oversight
- **Outreach and Coordination**:
  - Public Outreach and Notifications
  - Interbasin Coordination
  - CSAB and GSA Committee and Board Meetings
- **Monitoring and Reporting**
  - Required annual and 5 year updates
  - Coordination with DWR
  - Data collection and address data gaps
  - Oversight of consultants or contractors
- **Project and Management Actions**
  - Grant applications and management
  - Coordinate with partner agencies

The CSAB will continue to function as an appointed advisory board comprised of members appointed by both GSAs to advise the GSAs during Plan Implementation.

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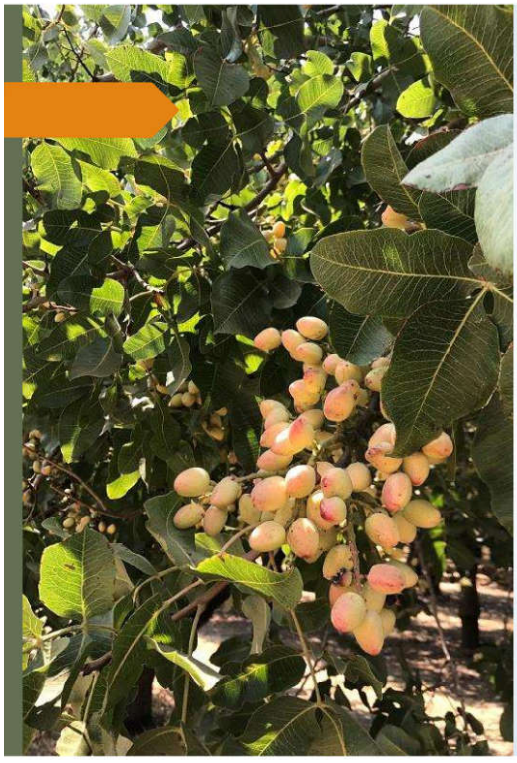

Questions and Comments on Near-term and Longer term Activities?

- GSA Staff remarks
- CSAB feedback
- Public comment

11/4/2021

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End of Meeting

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11/4/2021

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Corning Subbasin Public Draft Groundwater Sustainability Plan 2021 Public Workshops

October 4 (in-person) and October 13 (webinar)

Key Discussion Takeaways

Background

Two public workshops containing the same information were held for the Public Draft Corning Subbasin Public Draft Groundwater Sustainability Plan (GSP) on October 4 (in-person) and October 13 (webinar), 2021. Groundwater Sustainability Agency (GSA) staff presented the GSP content; the technical consultant Montgomery & Associates (M&A) was available on October 13 to address technical questions. The primary goals for the workshops were to 1) provide an overview of the GSP contents and where to find the information; 2) highlight the key takeaways from the Public Draft GSP; 3) identify resources for additional information and how to submit comments, and 4) discuss how and why it is critical to remain involved as the process progresses toward GSP implementation. The 45-day public comment period for the Draft GSP ended on October 25, 2021.

Materials: Agenda Packet | Slide Deck | GSP Executive Summary | Oct 13 webinar recording

Meeting Summary and Discussion Highlights

The following provides a brief meeting summary and discussion highlights raised during the October 4 and October 13 public workshops.

Welcome, Agenda, and Orientation

Nichole Bethurem (Tehama County Flood Control and Water Conservation District / Tehama County GSA staff) welcomed attendees. Stephanie Horii (CBI Facilitator) reviewed the agenda, workshop objectives, and comment procedure.

Background and SGMA 101

S. Horii provided an overview of the SGMA, and N. Bethurem reviewed how the two GSAs and advisory groups for the Corning Subbasin have been working together to develop the GSP. Lisa Hunter (Glenn County / Corning Sub-basin GSA staff) then presented an overview of the GSP content.

Basin Setting: Understanding the Corning Subbasin Characteristics

L. Hunter presented Sections 1-4 of the GSP: Introduction and Agency Information, Plan Area, Basin Setting (Hydrogeologic Conceptual Model (HCM) and groundwater conditions), and Water Budget.

Discussion on Historical Water Budgets

- What are the data and rationale for the historical water budget takeaways? A storage surplus did not seem aligned with hydrographs indicating diminishing water levels.
    - The historical groundwater budget ends in 2015, which is when groundwater levels were just starting to decline. The overall historical water budget encompasses the time frame 1974 to 2015. When viewed over that timeframe, the cumulative (overall) change in storage was still positive, since the historical amount of groundwater in storage was quite high, prior to extensive well development. The annual change in storage shows a recent

decline. The current water budget then shows a decline in storage overall that is exacerbated in the projected future water budget. Note that for GSP planning and implementation, we want to focus on the projected water budget.

- Concern raised that deepening wells in recent decades may have had a bigger impact on shallow wells than the GSP estimates.

Monitoring Network and Sustainable Management Criteria (SMC)

L. Hunter reviewed Sections 5 and 6 on monitoring networks and the SMC for defining and evaluating sustainability and tracking progress.

Discussion on Water Quality

- How does the GSP protect water quality and prevent future degradation (e.g., nitrogen)?
    - Water quality management under the GSP consists of a "do no harm" approach, essentially making sure that GSP actions do not impact existing water quality conditions, and involves review and coordination with other agencies responsible for water quality oversight (such as the Coalitions and Water Boards). Water quality SMC have been established and will be adhered to. Specific water quality monitoring will be developed for projects and management actions, as needed, to make sure the GSP implementation does not degrade water quality.

Discussion on Groundwater level Undesirable Results (UR)

- What does the groundwater level UR translate to in real life (e.g., which wells going dry over how many years)? Concerns raised that most domestic well owners do not understand how the groundwater level UR definition impacts their wells.
    - SMC section includes figures and tables that help describe what the worst-case scenario might look like. The SMC section also specifically looked at impacts to domestic wells.
- Concern raised that the groundwater level SMC gives too much leeway for dropping levels and does not sufficiently protect the small well owners, whose wells are at greater risk of going dry due to drought and overdraft.

Discussion on SMC Development

- How did the GSAs decide on UR definitions and SMCs for avoiding these URs?
    - The GSAs decided on SMCs that had to balance the needs of multiple beneficial users in the subbasin. In-depth discussions occurred at monthly Corning Subbasin Advisory Board (CSAB) meetings; a special CSAB evening meeting occurred specifically on groundwater level SMCs. The Tehama County Groundwater Commission also received monthly up-dates. All GSAs' and advisory group meetings have been open to the public.
- Concern raised that including newer wells (less than 30 years old) may not detect impacts to many domestic well owners (whose wells are often more than 30 years old).

Projects & Management Actions (PMAs) and Plan Implementation

L. Hunter presented an overview of the types of projects and management actions (Section 7) to address groundwater issues and the plan for implementing the GSP (Section 8), including cost estimates and long-term funding needs to be further addressed during GSP implementation.

Discussion on Funding

- When will the more in-depth GSP funding discussions occur?

- Currently working on funding mechanisms at a staff level. More focused discussions with the Tehama County GSA and Corning Sub-basin GSA are expected to occur starting in January 2022.

- How much of the costs are for GSP administration/operations compared to GSP implementation?
  - About $600,000 per year (for the first five years) is estimated for administration; the rest is for implementation.
- How much support can we expect to gain from grants?
  - One of the major grant sources is through CA Dept of Water Resources (DWR) Sustainable Groundwater Management Program, which is currently providing funding for implementing projects, but not for GSA administration and operations. The GSAs need to establish separate funding mechanisms to cover administrative costs.
- Compared to other basins, a much larger portion of landowners in the Corning Subbasin do not irrigate (west side of the basin specifically mentioned). Charging per acre seems to unfairly charge and be an unfeasible cost burden on dry-land farmers. Can these areas or user types be managed differently? (potential subbasin boundary modifications discussed)
  - This type of input is very useful. Stay involved as funding discussions gain momentum in early 2022. Basin boundary modifications are a CA DWR process; not much can be done by the GSAs in the short term. As more data become available, the GSAs can revisit if boundary modifications are warranted and be prepared for the next DWR boundary modification process.

Additional Discussion

- Well owners also need to be aware of and understand they have a responsibility to maintain their wells and not solely rely on the GSAs / GSP.

What's Next?

S. Horii and the GSAs emphasized the importance of public involvement as the process transitions to GSP implementation and provided information on how to stay engaged.

Public Awareness and Input

- How will the GSP present public comments, and how will DWR consider public comments?
  - An appendix in the GSP includes a table of the comments received thus far and responses to those comments. A similar approach will be used for comments submitted through the 45-day public comment period.
  - DWR has a separate public comment review process – 75[1] days after GSP submission/posting and up to 2 years to review and assess the GSP.
- What opportunities and mechanisms are available to provide impact and ensure the decision-makers (GSAs and the State) are aware of the public's concerns? (Concern that previously raised issues did not appear to be incorporated into the GSP. Desire for more dialogue and meaningful discussion in the future)
  - The GSAs provide a public comment period on the Draft GSP prior to adoption (45-days for this GSP), and DWR provides a comment period after GSP adoption and posting on their website. Additionally, the GSA board and advisory group meetings are open to the public. SGMA requires that GSAs find a balance that considers all beneficial users and uses of groundwater;

[1] Correction: According to (10733.4(c)): Upon receipt of a groundwater sustainability plan, the department shall post the plan on the department's Internet Web site and provide **60 days for persons to submit comments** to the department about the plan.

the group acknowledges that can lead to frustration and dissatisfaction. Going forward, the 5-year updates are opportunities to re-evaluate and discuss how to adapt. GSA staff encourage the public to submit comments in writing to ensure comments are captured fully and accurately.

- Because the GSP needs to balance many different groups with different interests; some very tough decisions have to be made, which underscores the importance for the public to be aware and understand how this affects them.

Outreach & Engagement Materials & Mechanisms

- Concern raised about how the "How to Comment" handout described the potential impact to domestic well owners; stating that the language appeared to diminish the impact. It is important for domestic well owners to know this GSP may affect them.
    - Broad awareness and understanding of SGMA and GSP impacts are important. The referenced language was intended to clarify that SGMA addresses de minimis / domestic well owners differently than those who generally use substantial amounts of groundwater (e.g., agriculture) and does not imply that residential wells are not covered by the GSP.
- Concerns raised about low attendance and inconsistent outreach in local newspapers. Some questioned whether more could be done to encourage attendance, citing the same persons attending meetings.
    - We have observed across various subbasins that attendance has been relatively lower compared to previous meetings. Potential factors could include COVID concerns, harvest, meeting fatigue and meetings overlap (many GSP meetings occurring within the same condensed timeframe), etc. Overall, we expect interest and attendance to be higher when the topics of funding and specific PMAs arise, underscoring the importance to stay involved.
- [At the Oct 13 webinar, participants (5) identified their preferred methods for staying involved. Their responses are provided at the end of this document.] Preferred communication methods include e-mail list-serve, paper mail, newspaper, and public workshops/meetings.

Other GSP or SGMA-related Comments/Questions

Nexus with near-term needs

- Participants sought to better understand how current or near-term activities (e.g., current operations, wells going dry, new development, etc.) interact with the SGMA process.
- The subbasin's window of opportunity to intervene to avert undesirable outcomes is closing quicker than predicted by the GSP, as evidenced by neighbors' wells going dry and well productivity falling.

Not directly related to SGMA

Current large business/corporation operations

- Question about specific rock quarry's water use and management restrictions near City of Corning.
    - Connect with Nichole Bethurem/Tehama GSA to better understand specifics.

New well permits

- Concern raised about how land use planning agencies (county planning / environmental health departments) are currently reviewing and approving well permits for installing large wells.
    - Not specifically covered under the SGMA process. Connect with county staff to learn more about which meetings / processes are delving into well permitting.

Attendance Overview

GSA Staff:

- Tehama County: Nichole Bethurem
- Glenn County: Lisa Hunter
- Glenn-County Irrigation District (Oct 4): Holly Dawley

Technical Consultant (Oct 13): Lisa Porta, Montgomery & Associates

Facilitators: Stephanie Horii, Olatunji Oniyaomebi (Oct 4), Consensus Building Institute (CBI)

GSA / CSAB members: 2 at Oct 4 meeting: Bob Williams and Steve Gruenwald

Public Attendance: approximately 7 at the Oct 4 meeting; 10 at the Oct 13 webinar.

Oct 13 Polling – Responses Raw Data (5 respondents)

Preferred method(s) for connecting with you?

- Email list-serve; eNewsletter (quarterly, Tehama County); Paper mail; Direct call; Newspaper; Radio; Public workshops and meetings
- Website - CorningSubbasinGSP.org; Email list-serve; eNewsletter (quarterly, Tehama County); Paper mail; Direct call; Public workshops and meetings
- Paper mail; Direct call; Newspaper; Radio; Public workshops and meetings
- Email list-serve; Paper mail
- Email list-serve; Social Media; Paper mail; Newspaper; Public workshops and meetings

Specific newspapers / networks:

- Valley Mirror
- Farm Bureau

Corning GSP Public Comments for CSAB Meeting

Comment Number	Page	Subsection	Table	Figure	Date	Commenter/Affiliation	Comment
1		2			10/17/2021	Kathryn Vogt-Haefelfinger Quiet Hills Ranch Co.	**1. Communication with Landowners on the Westside** We are joining the conversation regarding the Groundwater Sustainability Plan Draft late in the process. This is not due to lack of interest in the subject matter. Far from that. We simply did not receive information making it clear to us that our property is in the Corning Subbasin GSP. It was not until it was pointed out to us in late August of 2021 by a westside landowner that we were made aware of such and of the possibility of being affected by a per acre tax. Moving forward, we would suggest that all landowners receive information and notifications directly from you by mail. In addition, GSP information should be shared with the public and stakeholders via local newspapers. It is our understanding that to this day not all stakeholders are aware of the direct impact the GSP will have on them. We believe that it is of the utmost importance that GSP information reaches all landowners and domestic well owners. Stakeholders need to understand the process and the funding mechanisms and must be made aware of the impact the GSP will have on them and on their livelihood.
2		8			10/17/2021	Kathryn Vogt-Haefelfinger Quiet Hills Ranch Co.	**2. Funding - per acre fee** We would like to voice our concerns regarding the funding of the GSP, specifically the possible per acre fee. We must point out and underline the unfairness a per acre fee would have on Westside and Dryland Landowers. We understand that there are several ways to fund the GSP capital projects, activities, and management. Funding mechanisms like taxes, fees and assessment each having its own benefits, limitations, and problems. Fairness and equity are paramount because a "one size fits all" will have potentially profound consequences for property owners and the type of land owned, including uses thereof. For instance, some landowners such as those at Quiet Hills Ranch (established in 1930), now have numerous family members as minority owners. Due to water limitations, the land can only be used for cattle operations. Income is therefore limited. If a flat tax were imposed on a per acre basis, the result would be a permanent financial loss from operations. Such a condition is not sustainable or correctable. Fairness and equity demand a funding process which does not destroy this nearly 100-year ownership. Moreover, QHR provides substantial community benefits from its operation. Wildlife is provided protection, feed, and water. Fire danger, which could have a devastating effect on numerous other people, is minimized by the annual grazing of cattle. Roads are maintained so that emergency vehicles can easily and quickly get where they need to go. Other landowners, with more water, would be forced to convert from cattle grazing to orchards, with a substantial negative impact on groundwater. The owner adjacent to QHR, for example, owns 509 acres, which is leased out to third party cattlemen. There are no structures on that property. There is one pond, with water only if there is sufficient runoff from the rains. A $2.00 per acre tax would consume the entire lease income, a result which would be unfair, unjust, and inequitable in the extreme. The GSP plan for capital projects and activities would provide no benefits whatsoever to the type of owners listed above. Those benefits should be paid by those who actually benefit therefrom, not allow them to benefit at a lower effective cost at the expense of poorer landowners who receive no benefit whatsoever. A tax-based system would be the most unfair and inequitable. Taxes need not be directly tied to benefits or costs. The negative consequences described above would be guaranteed results, with the further effect of potentially draining water tables and enhancing fire danger and threatening wildlife otherwise provided for. In short, it is of critical importance that GSP funding programs - whether of taxes, fees, or assessments - take account of the actual and practical effects on landowners in a water basin with so many different land sizes, uses, and additional community benefits.
3		7.3.2.1			10/25/2021	Michael Ward, Stakeholder	The MA does not identify that a Well Inventory MA will be conducted within the Tehama County portion of the subbasin. The MA needs to be applied to the entire subbasin. The Well Incident Report System MA states that the GSA's "could assist" Tehama County and Glenn County with a well incident reporting program. The system of well incident reporting is important to sustaining groundwater resources in the basin. This MA appears to be more of a suggestion rather than a dedicated action. Both MA's are non-committal to a basin-wide approach.

Corning GSP Public Comments for CSAB Meeting

Comment Number	Page	Subsection	Table	Figure	Date	Commenter/Affiliation	Comment
4		7.3.2.1			10/25/2021	Michael Ward, Stakeholder	Chapter 7 of the GSP documents the need for additional monitoring. See Figures 7-1 and 7-2 (Figure 7-1: *Areas Identified with Groundwater Concerns or Protection Needs* ; Figure 7-2: *General Project and Management Action Categories and Areas of Implementation to Assist with Groundwater Sustainability* .) The figures show a generalized area where domestic wells have been impacted west of the City of Corning. Chapter 3, Figures 3-20 and 3-21, illustrate the need for expanded monitoring. Section 3.2.8 *Groundwater Conditions Data Gaps and Uncertainty* identified the need for "additional wells installed and/or monitored" in this area. Why hasn't the development of the groundwater monitoring grid in this region been identified as a MA?
5		7.3.2.3.5			10/25/2021	Michael Ward, Stakeholder	The GSP states that the Tehama County well permit process will be finalized within 1-year after GSP submittal. This is a lot different than what was said during the Board of Supervisors meeting held for the consideration of the well moratorium – the draft well permit ordinance was reported to be ready within 45 days. There is no scheduled commitment to evaluate land use, water use, and well permitting policy changes. Section 7.5.1 Land Use Planning states that the GSA's will work with Glenn and Tehama Counties etc., to assist with land use. The GSA's role will primarily focus on general plan updates with a focus to land use development, water demands, water availability, and locations of sensitive habitat including GDEs. I believe the Tehama County General Plan update is due to begin in 2025. Glenn County's General Plan update is in progress now (https://glenncounty.generalplan.org/). The GSAs need to coordinate on the Land Use Element as soon as GSP adoption.
6	8-1, Bullet #8				10/24/2021	Lerose Lane, Stakeholder	Suggest: adding for changing watersheds characteristics due to fires
7	8-2	8.1			10/24/2021	Lerose Lane, Stakeholder	Suggest: adding an organizational chart
8	8-3, Bullet #5 and 7	8.1.2			10/24/2021	Lerose Lane, Stakeholder	Should add a minimum meeting schedule for the Advisory Board and GSA Board meeting. Perhaps, quarterly meetings would be appropriate. Suggested addition in red: The GSAs may collaborate and retain consultants and contractors to execute certain activities on behalf of the GSAs **with the approval of the Advisory Board and the County Board of Supervisors** such as collecting data from the GSP monitoring network, developing plans for data gap investigations...
9	8-5	8.2			10/24/2021	Lerose Lane, Stakeholder	GSA administrator shall have the ability to purchase basic operational items within their allotted budget without approval from the Corning Subbasin GSA members. Suggested addition in red: Bullet #1: **The levy of fees by the GSA must be verified as being reasonable and approved by the Advisory Board, and ultimately approved by the County Board of Supervisors.**
10	8-6				10/24/2021	Lerose Lane, Stakeholder	There appears to be no limit on the amount of fees that can be assessed. Property taxes have already been raised 15% on many landowners this last fiscal year. I was informed by the County Assessors Office that there is a plan to raise property taxes again next year. It certainly seems that the property owners within the GSP limits could be unduly taxed. Are there going to be any limitations on how much these property tax fees can be raised for the GWP, and the GWA funding?
11			8-1		10/24/2021	Lerose Lane, Stakeholder	CALFED Water use Efficiency Program - Why would our GSA provide funding for the Bay - Delta water? WaterSMART USBR - Why do we want to promote water marketing from within our GSP? Would this result in our groundwater being sold outside of our counties' jurisdictions?
12	8-8	8.3.1.1			10/24/2021	Lerose Lane, Stakeholder	Second paragraph: Shouldn't there already be a tentative agreement with DWR Northern Region Office for the GSP implementation period?
13	8-10				10/24/2021	Lerose Lane, Stakeholder	The deadline for submitting the first annual report to DWR may need to be extended. Until a report format is established, along with the required content, more time may be needed for report development. April 2, 2022, is fast approaching.

Corning GSP Public Comments for CSAB Meeting

Comment Number	Page	Subsection	Table	Figure	Date	Commenter/Affiliation	Comment
14	8-16	8.6.2			10/24/2021	Lerose Lane, Stakeholder	This seems to be a duplicate effort to establish a well registration program. DWR already has a database for wells, and the well drillers are required to turn over their well logs. Most crops have a water need/requirement, and established estimates for crop type could be employed for water usage. This proposal could put an additional burden on farmers for purchasing a water meter, and for providing water usage data to the GSA.
15	8-17		8-2		10/24/2021	Lerose Lane, Stakeholder	Is there a need for peak water flows for the models?
16	8-18, last paragraph				10/24/2021	Lerose Lane, Stakeholder	With the current drought situation, 2-3 years for a model update may be too long.
17	8-19, Bullet #3				10/24/2021	Lerose Lane, Stakeholder	This bullet point is stating that our water rights will be changed as necessary. Shouldn't this be a legislative function?
18	8-22 and 8-23		8-4 and 8-5		10/24/2021	Lerose Lane, Stakeholder	Legal services of $50,000 per year seems too high.
19	8-25		8-6		10/24/2021	Lerose Lane, Stakeholder	How much staffing (numbers and functions) is anticipated?
20	ES-1			ES-1	10/23/2021	Holly E. Reimers, Landowner	The map of the Corning Subbasin shows a lot of ground on the west side of the basin. Most of the ground in the western part of the basin and those lands west and south of Black Butte Lake has little if any groundwater. These land owners are receiving no benefit from being included in this basin and should be removed.
21	ES-3				10/23/2021	Holly E. Reimers, Landowner	The move away from surface water to the use of groundwater in the past several years should be alarming. There has been a major change away from annual crops to perennial crops. With the increase of planting of perennial crops, i.e., trees, the overdraft of the groundwater is happening now. The use of surface water should be addressed and encouraged.
22	2-41	2.7.4			10/23/2021	Holly E. Reimers, Landowner	The use of pressurized water sources to be able to use the surface water provided from the OUWUA in place of groundwater should be encouraged. The OUWUA system is in place to also move high water during the winter months to areas that can help in the recharge of the groundwater.
23	8.2				10/23/2021	Holly E. Reimers, Landowner	What does not seem to be addressed is a "fee" / "tax" on those lands within the basin. This would add to the cost with no additional benefit to the landowner. It is noted that the west side of the basin is marginal ground used primarily for the grazing of livestock. To increase the amounts that we are already paying per acre would force some to look for other means to try and hold on to their ranches. As in selling their groundwater which would not benefit the groundwater situation in the Corning Subbasin.
24		General			10/23/2021	Holly E. Reimers, Landowner	It has come to mine and other attention that there are groups that have been formed to "farm groundwater." **Exporting groundwater outside of the basin should not be allowed,** especially when it is leaving the Northern California area. This is **NOT SUPPORTABLE**!
25		General			10/23/2021	Holly E. Reimers, Landowner	Reading through the Corning Subbasin GSP is somewhat of a monumental task. Reading through sections 3, 4, and 5 one should at least have a graduate degree in Engineering, Hydrology, and Geology just for starters. So much of this is way over the comprehension level of the normal landowner in Northern California. My overall feeling is that what you are doing is too little, too late, as domestic wells are going dry and landowners/homeowners are having to drill deeper just to find enough water to flush their toilets. It seems that the only way to correct this path that none of us want to go down, meters on wells and being told what **we can or cannot do with the ground we own.**
26	ES-2	Background		ES-2	09/22/2021	Tamara Williams, Stakeholder	If keeping this figure, substitute the word "Plan" for "Design" in this figure. The GSP isn't really a design.
27	ES-2	Background		ES-2	09/22/2021	Tamara Williams, Stakeholder	Consider deleting this figure or replacing it with one that relates to the process described in the GSP. It doesn't provide clarity, and gives the visual impression that the GSP is going down the drain.
28	ES-1	Background			09/22/2021	Tamara Williams, Stakeholder	The GSP process will be ongoing. Add a statement that the iterative process will continue into the future.
29	ES-3	Background		ES-3	09/22/2021	Tamara Williams, Stakeholder	The terminology in ES-3 should be consistent with that of Figure ES-2 and the description of the development process in the text.
30	ES-3	Background			09/22/2021	Tamara Williams, Stakeholder	1st para, 1st sentence. The water supply isn't quantified; the use is. Since use may exceed supply in this subbasin, suggest changing "Water use in the Subbasin is largely for agricultural irrigation, which uses over 90% of the Subbasin's water supply" to read "Agricultural irrigation accounts or more than 90% of the water used in the subbasin."
31	ES 3-4	Background			09/22/2021	Tamara Williams, Stakeholder	"Achieving groundwater sustainability" may require more than conjunctive use. It isn't clear that there will be sufficient surface water available to this subbasin to offset the potential groundwater overdraft. The Executive Summary should mention other possible management actions that will be considered.
32	Global				09/22/2021	Tamara Williams, Stakeholder	Search and replace "sub-basin" with "subbasin"

Corning GSP Public Comments for CSAB Meeting

Comment Number	Page	Subsection	Table	Figure	Date	Commenter/Affiliation	Comment
33	ES-5	ES-1			09/22/2021	Tamara Williams, Stakeholder	Last sentence needs clarification. Maybe "The Advisory Board made recommendations to the GSAs for the key plan elements; the decision making authority resided with the governing bodies of the GSAs."
34	ES-6	ES-2			09/22/2021	Tamara Williams, Stakeholder	1st para, 2nd sentence. Change "comprises" to "includes." Refer to Figure ES-1 here.
35	ES-6	ES-2			09/22/2021	Tamara Williams, Stakeholder	2nd para. 2nd sentence. Change to read, "There are 5 Sacramento Valley subbasins adjacent to the Corning Subbasin for which…"
36	ES-6	ES-2			09/22/2021	Tamara Williams, Stakeholder	4th para. Make sure the numbers in this paragraph add up, and are consistent with the data in Section 1. 195,000 AF is 93% (closer to 95% than 90%) of 210,000 AF. It looks like the "5,000 AF" for public and other uses should be "15,000 AF."
37	ES-7	ES-2			09/22/2021	Tamara Williams, Stakeholder	1st line. Black Butte Reservoir is operated by USACE. USBR operates the reservoirs upstream of Black Butte (East Park and Stony Gorge).
38	ES-7	ES-2		ES-4	09/22/2021	Tamara Williams, Stakeholder	2nd full sentence and Figure ES-4 title. Change "providers" to "districts."
39	ES-7	ES-2			09/22/2021	Tamara Williams, Stakeholder	1st full para. My understanding is that some small farmers west of I-5 had their surface water cut off completely during 2021, and stopped irrigating their orchards and crops. Because of the low groundwater levels in this area, and the number of domestic wells that weren't deep enough to tolerate increased groundwater pumping this season, neighbors opted to cease irrigation.
40	ES-8	ES-2			09/22/2021	Tamara Williams, Stakeholder	1st full sentence. CASGEM not CSAGEM.
41	ES-8	ES-2			09/22/2021	Tamara Williams, Stakeholder	Last paragraph. This paragraph gives the impression that the stakeholders involved in the GSP represented the range of groundwater users with concerns about sustainability. My observation is that only a few members of the public that aren't large land owners were involved. First sentence - Delete the word "robust." Last sentence - Delete the word "extensive." Effective public outreach results in public participation. In my opinion, the outreach program didn't effectively involve the public.
42	ES-9	ES-3			09/22/2021	Tamara Williams, Stakeholder	2nd paragraph. Please have a Geologist review/revise this paragraph.
43	ES-10	ES-3			09/22/2021	Tamara Williams, Stakeholder	3rd full paragraph. 2nd sentence. Please clarify. Don't USBR and USACE both manage for flood control and irrigation? I think it should be "The Sacramento River and Stony Creed are dammed and managed by USBR and USACE for flood control and irrigation supply."
44	ES-10	ES-3			09/22/2021	Tamara Williams, Stakeholder	4th full paragraph states: "The Sacramento River and the other creeks, to a lesser extent, provides a significant source of groundwater recharge to the alluvial aquifer. Surface water flow and recharge of groundwater aquifers is greatest in the winter and spring when precipitation is highest; flow in the river and creeks in the summer and fall dry season is generally supported by baseflow from groundwater and very little groundwater recharge occurs." Doesn't Sacramento River provide groundwater recharge in the dry season? See 3.2.7.1 and Figure 3-53.
45	ES-11	ES-3			09/22/2021	Tamara Williams, Stakeholder	1st bullet. "Cotemperaneous" should be "contemporaneous"
46	ES-11	ES-3			09/22/2021	Tamara Williams, Stakeholder	2nd bullet. Definition of the aquifer properties is limited throughout the Corning Subbasin. No need to call out the Tehama and Tuscan here.
47	ES-12	ES-3			09/22/2021	Tamara Williams, Stakeholder	Last paragraph. Second sentence. There wasn't a "positive" change in storage; that would be reflected by rising water levels over time. In fact, water levels away from the Sacramento River generally had a gradual overall decline through the 20th century. Maybe say "with minor change in storage over time."
48	ES-14	ES-3			09/22/2021	Tamara Williams, Stakeholder	Interconnected Surface Water. First paragraph. Last sentence. Include seasonal observations of streambed conditions, including the presence or absence of water in the streams in areas of concern. The magnitude of streambed erosion and aggradation (local changes in streambed elevation), compared with static as well as pumping groundwater level elevation fluctuations will be important to understand, monitor, and address impacts on interconnected surface water.
49	ES-15	ES-3			09/22/2021	Tamara Williams, Stakeholder	Groundwater Dependent Ecosystems. For context, suggest referencing DWR's California Groundwater Update 2020 - Highlights, which states that "groundwater dependent ecosystems and interconnected surface water are management topics in need of greater attention, engagement, and data collection across the state."
50	ES-15	ES-3			09/22/2021	Tamara Williams, Stakeholder	Groundwater Dependent Ecosystems. Low groundwater level conditions over the past few decades likely reduced the extent of groundwater dependent ecosystems. The GSAs and the GSP should provide for the eventual recovery of those ecosystems where they would be expected when water levels recover and stabilize.

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51	ES-15 AND Section XX	ES-3			09/22/2021	Tamara Williams, Stakeholder	Sustaining groundwater in perched zones, which in turn support GDEs, should be addressed in this document. While it may be beyond the scope of this GSP to characterize all the perched aquifers in the subbasin, the basinwide potential for their recovery and sustainability should be included. Monitoring for changes in GDE vegetation using satellite imagery should not be limited to just those areas where GDEs are present under today's conditions.
52	ES-15	ES-3			09/22/2021	Tamara Williams, Stakeholder	Last 2 paragraphs - It's not clear how these statements regarding Data Gaps pertain to Seawater Intrusion. Should there be a separate Data Gaps heading?
53	ES-17	ES-4			09/22/2021	Tamara Williams, Stakeholder	1st bullet - How can there be a gain in groundwater storage when groundwater levels have been declining over the historical period?
54	ES 16 - 19	ES-4			09/22/2021	Tamara Williams, Stakeholder	SECTION ES-4 -- This discussion is much too difficult to follow for an Executive Summary. Reiterate the relationship between water level elevations and groundwater storage. Part of the confusion here is that groundwater storage is not a function of time; it's an instantaneous metric. If recharge to the basin keeps up with production, there should be no change in storage. If recharge is induced by pumping near the river, for example, there can be an increase in groundwater production with no change in storage. But if water levels are declining in a portion of the subbasin, there is, by definition, a decrease in groundwater storage in that portion of the subbasin.
55	ES-19	ES-4		ES-7	09/22/2021	Tamara Williams, Stakeholder	The 2070 Simulation Pie Chart shows "Net Groundwater Discharge to Streams" as being an inflow. Please correct this. Either it's recharge from streams/rivers, or it belongs on the outflow side of the pie chart.
56	ES-20	ES-5			09/22/2021	Tamara Williams, Stakeholder	1st paragraph, last sentence. Suggest modifying to read, "… to **manage for and** demonstrate sustainability…."
57	ES-23	ES-6	ES-1		09/22/2021	Tamara Williams, Stakeholder	Chronic Lowering of Groundwater Levels, Reduction of Groundwater Storage, and Depletion of Interconnected Surface Water in areas of declining wells - The SMC (specifically the Minimum Thresholds, Measurable Objectives, and Undesirable Results) for Declining Wells are not protective of the shallower groundwater resources, well owners/users whose wells are not deep, and groundwater dependent ecosystems in the areas of declining wells. In areas of declining water levels, the 2015 water levels likely represented overdraft conditions, and should be revisited during the implementation of the GSP for their appropriate use as a Measurable Objectives for these Sustainability Indicators.
58	ES-24	ES-7			09/22/2021	Tamara Williams, Stakeholder	Second bullet -- Include non-agricultural water uses. Best practices should be developed and implemented for any significant commercial, industrial, recreational, or other future water use in the subbasin.
59	ES-25	ES-7	ES-2		09/22/2021	Tamara Williams, Stakeholder	Well Management Program - Purpose -- Include better understanding of groundwater use in this Management Action. ("Better understand well **and groundwater use** distribution in the Subbasin…")
60	ES-27	ES-8			09/22/2021	Tamara Williams, Stakeholder	4th bullet -- Include informing the public as part of the purpose of the annual and 5-year reports. ("…to inform DWR **and the public** on the status…")
61	1-10	1			10/01/2021	Tamara Williams, Stakeholder	1st paragraph. The statement "The water budget was based on the best available information and an integrated hydrologic modeling tool," seems misleading. The model doesn't accurately represent the observed reduction in storage, as evidenced by declining water levels in the subbasin. The inconsistency between the modeling results and observed conditions should be discussed.
62	2-63 and 2-78	2.16			10/25/2021	Tamara Williams, Stakeholder	Notice and Communication. As a stakeholder and interested party who participated in the GSP process, I'd like to share my perspective and observations. (Part 1) **About me:** I came to the process as a native of the Corning Subbasin (Corning Union High School class of 1971) with a keen interest and professional background in groundwater. Both my parents were born in Corning. My father, Glen Williams, was a licensed water well drilling contractor in Tehama County from the 1940s until the 1990s. He learned the trade from his father-in-law, Orenzo L. Wilder (born near Paskenta in 1882), and Orenzo's brother-in-law, Henry Grieve, who began drilling water wells in the area in the 1920s. Fascinated by the subsurface, I received a Bachelors Degree in Geology from UC Davis in 1975, and began working in geology and groundwater consulting in 1977. I became a California Registered Professional Geologist in 1985, and Certified Engineering Geologist in 1989. Much of my career involved groundwater resource development, protection, and remediation. Since 2015, I've been retired. My mother, Katherine "Faye" Wilder Williams still lives in Tehama County. Our family owns and continues to manage the property Mom was born on in Corning (just west of I-5), which includes about 10 acres of Sevillano olives. We have a 450' deep irrigation/domestic well.

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63	2-63 - 2-78	2.16			10/25/2021	Tamara Williams, Stakeholder	Notice and Communication. As a stakeholder and interested party who participated in the GSP process, I'd like to share my perspective and observations. (Part 2) **My participation in the Corning Subbasin GSP.** From the first meeting of the Corning Subbasin Advisory Board (CSAB) that I attended (virtually, due to the Covid-19 pandemic restrictions) in 2020, I have been concerned about the limited involvement of other domestic well owners and small farmers. The opportunities for public comment during CSAB and Tehama County Groundwater Commission meetings have involved minimal feedback, response, or follow-up from board and commission members. The GSA staff and consultants have been helpful and encouraging. My understanding is that the limited participation by domestic well owners and small farmers in the GSP process is common in rural subbasins such as Corning. I have made suggestions for improving outreach, and have expressed my concerns regarding the lack of consideration and protection for domestic well owners and groundwater dependent ecosystems during the GSP development process. Most of them are reiterated in these comments on the Public Review Draft. I hope some of them will be considered and incorporated in the GSP implementation phase. I have tried to channel my father and grandfather's stewardship perspective on the incredible, but fragile groundwater resources of this area.
64	2-65	2.16.2			10/23/2021	Tamara Williams, Stakeholder	The importance of protecting the shallow groundwater in the western half of the Corning Subbasin is heightened by the fact that the groundwater users comprise a Disadvantaged or Highly Disadvantaged Community. Having wells go dry here is not acceptable from a social justice perspective if there are measures that could be taken to reduce/reverse drops in water levels. Identifying the DACs is an important first step.
65	2-65	2.16.2			10/25/2021	Tamara Williams, Stakeholder	Implementation of the GSP, including adaptive management, will require direct representation of the interests of all basin users. This should be included as a Data Gap, and a Management Action should be added to ensure the GSP implementation considers and protects the interests of all beneficial users.
66	2-65	2.16.3			10/23/2021	Tamara Williams, Stakeholder	Section 2.16.3 states that, "The C&E Plan will be updated prior to finalization of this GSP to reflect changes and adaptations to the process and will constitute a living document for further updates during GSP implementation." The C&E Plan included in this Public Review Draft of the GSP (Appendix 2A) only covers the period of GSP development (2019-2022). Public review of the Final C&E Plan needs to be accompanied by increased outreach and involvement, particularly among the Disadvantaged and Highly Disadvantaged Communities (Figure 2-22) that make up the west side of the subbasin. Without that, the GSP process will continue to be an elitist effort, controlled by large groundwater user interests. I recommend that the GSAs assign a local community liaison who is responsible for ongoing face-to-face outreach, participant coordination, and representation for the domestic well and small farm owners.
67	2-69	2.16.3.2	2-11		10/23/2021	Tamara Williams, Stakeholder	Themes 3 and 4. The way that these apparently conflicting themes were addressed allows for shallow wells to go dry, while maintaining "operational flexibility" for deeper, high production wells. This results in an apparent bias in that favors the large groundwater producers.
68	2-75	2.16.3.4			10/23/2021	Tamara Williams, Stakeholder	Public contact was primarily electronic. This skewed the profile of members of the public who have been involved in the Corning Subbasin GSP. Many people in the more rural areas of the subbasin don't have good internet access and aren't skilled in electronic communication.
69	2-78 and 4-2	2.16.4; App 2F; 4.1.1			10/23/2021	Tamara Williams, Stakeholder	Clarification of Comment and Response during Comments on Section 4. Comment #8 and GSP Development Team Response. Meeting minimum thresholds, which are based on static water levels, will not prevent localized upwelling of saline groundwater which could happen during pumping, but wouldn't be evident in the static water level data.
70	3-1	3.1.2			10/18/2021	Tamara Williams, Stakeholder	North lateral boundary description should read: "North – Thomes Creek from around Flournoy in the **west** to its junction with the Sacramento River in the **east**.
71	3-21	3.1.6.1.4			10/18/2021	Tamara Williams, Stakeholder	Black Butte Fault description should read, "… cutting through the **western** half of the Subbasin…"
72	3-52	3.2.2.2			10/18/2021	Tamara Williams, Stakeholder	The description of the trends in water level elevations are accurate, showing an overall decline from 2000-2018. While the increase in groundwater reliance is due, in part, to the shift from surface water to groundwater for irrigation, the increase in irrigation due to planting of new crops and associated installation of new ag wells also contributed to the increased groundwater extraction, and should me mentioned here.
73	3-57	3.2.2.3			10/18/2021	Tamara Williams, Stakeholder	The final sentence of the West area description reads, "Expansion of orchards and other irrigated crops will continue to increase demand for groundwater and result in a decrease in groundwater levels in this area." This is an acknowledgement of the unsustainability of the land development trend here.

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74	3-60	3.2.2.4			10/24/2021	Tamara Williams, Stakeholder	1st paragraph. Last sentence states: "Wells located closer to the Sacramento River may benefit from a greater degree of applied surface water, direct recharge from the river, and direction of groundwater flow from east to west toward the Sacramento river." Suggest deleting the last statement; groundwater flow toward the river would be from west to east. Localized flow directions likely depend on groundwater pumping and river level conditions. Consider stating that wells closer to the Sacramento River benefit from less groundwater pumping due to the availability of surface water for irrigation (if that's correct), and generally good hydraulic connection with the Sacramento River which has artificially sustained flow through the dry season. The fact that shallow wells (<100' deep) near the river have been going dry suggests that groundwater recharge from the river isn't keeping up with pumping stresses near the river and upgradient during dry periods.
75	3-69	3.2.2.7	3.6	3.29	10/18/2021	Tamara Williams, Stakeholder	p. 3-69. 2nd sentence. The collapsing of the vertical gradients exhibited at this well cluster is worth exploring further during the implementation of the GSP. It could be due to increased vertical conductivity caused by installation of wells in the area, or simply the overstressing of the deeper zones with pumping exceeding recharge.
76	3-73 and 3-74	3.2.3			10/18/2021	Tamara Williams, Stakeholder	If the model is accurate, the simulated storage picture described here (with an average annual increase in storage of 6,900 AF) should be reflected in increased water levels over time, which we haven't seen subbasin-wide. It would appropriate to mention this in the text, with a brief discussion of how the model input might be adjusted in the future to better simulate the changes in storage evidenced by the hydrographs of observed water levels.
77	3-95	3.2.6.3			10/18/2021	Tamara Williams, Stakeholder	The statement " the lower zone is generally no deeper than 250-300 feet bgs within the Subbasin," is confusing. Should it read, "the upper zone is generally no deeper than 250-300 feet bgs with the Subbasin"?
78	3-109	3.2.7.1			10/18/2021	Tamara Williams, Stakeholder	Thomes Creek. To the extent Thomes Creek becomes disconnected and goes dry due to pumping, shouldn't the GSPs for the Corning and Red Bluff Subbasins be addressing this depletion of surface water and the effects on riparian users and ecosystems?
79	3-124	3.2.8			10/18/2021	Tamara Williams, Stakeholder	Groundwater Conditions Data Gaps and Uncertainty. Given the discrepancy between simulated storage and hydrographs of observed water levels, this should be identified here, and actions should be proposed in Section 7 to better quantify changes in storage.
80	4-2	4.1.1			10/25/2021	Tamara Williams, Stakeholder	Bottom of model is no-flow boundary representing base of freshwater. Make sure that there is a methodology for ensuring that upward migration of high-TDS water doesn't happen due to upward vertical gradients created during pumping. Clarification of Comment and Response during Comments on Section 4. Comment #8 and GSP Development Team Response. Meeting minimum thresholds, which are based on static water levels, will not prevent localized upwelling of saline groundwater which could happen during pumping, but wouldn't be evident in the static water level data.
81	4-16	4.1.4			10/19/2021	Tamara Williams, Stakeholder	The first bullet is misleading. It begins, "As viewed over the entire historical period, the Corning Subbasin has not been subject to overdraft, as the change of groundwater in storage is positive, with groundwater inflows exceeding groundwater outflows". Suggested revision: "As simulated over the entire historical period, it would appear that the Corning Subbasin has not been in overdraft, with simulated inflows exceeding simulated outflows; however..."
82	4-16	4.1.4			10/19/2021	Tamara Williams, Stakeholder	3rd bullet. Last sentence. This key water budget take-away point highlights the critical need to coordinate analysis and management across subbasin boundaries during GSP implementation. Inter-subbasin coordination, particularly between the Red Bluff and Corning Subbasins, should be incorporated into the immediate actions to be taken.
83	4-16	4.1.4			10/19/2021	Tamara Williams, Stakeholder	4th bullet. States "Cumulative and annual change in storage is slightly declining in the current water budget simulation compared to the historical water budget; therefore, if water management strategies remain the same as they are now, the Subbasin will continue to experience groundwater level and storage declines and an overall worsening of conditions compared to historical conditions." This is a critical point. Make sure it is clearly addressed in actions to be taken.
84	4-16	4.1.4			10/19/2021	Tamara Williams, Stakeholder	5th bullet. Last 2 sentences are misleading. Suggest modifying to read: "The **simulated** historical average annual change of groundwater in storage is 6,900 AF, which **would indicate a** subbasin generally in balance over the historical time period. The **calculated** cumulative gain in groundwater storage of 290,300 AF over the historical simulation period **is not consistent with the observed declining trends in water levels, indicating that the model needs calibration during the GSP implementation phase."**
85	4-17	4.1.4			10/19/2021	Tamara Williams, Stakeholder	1st full bullet on p. 4-17. Unless it's required by SGMA guidance, suggest not calculating comparisons based on the simulation of historic conditions which do not appear to be consistent with observed overall decrease in storage.
86	4-17	4.1.4			10/19/2021	Tamara Williams, Stakeholder	4th bullet. 2nd sub-bullet: Suggest adding statement that management actions and/or projects may be needed.
87	4-17	4.1.4			10/19/2021	Tamara Williams, Stakeholder	4th bullet. 3rd sub-bullet: Management actions and projects will definitely be needed under these conditions. The GSP should be clear about this.

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88	4-18	4.1.4			10/19/2021	Tamara Williams, Stakeholder	In the spirit of SGMA, suggested revision: Simulated projected water budgets, **incorporating changes in conditions as well as projects and management actions undertaken,** along with sustainability indicator monitoring and SMC evaluation, will provide “proof” of continued sustainability during GSP implementation."
89	4-19	4.1.4		Fig 4-6	10/19/2021	Tamara Williams, Stakeholder	**General notes on groundwater budget simulations.** 1. The increase in storage shown on the pie charts for simulated historic and current conditions doesn't pass the straight-face test. 2. Confirm that the text is clear that the simulation input for net subsurface inflow (or outflow) will need to be consistent with the adjacent subbasin simulations and reporting.
90	4-69	4.4.2			10/19/2021	Tamara Williams, Stakeholder	The following important statement seems hidden here: "Trends in land and surface water use not incorporated in these simulations, such as increases in total irrigated acreage or conversion from non-irrigated lands to orchards, may further exacerbate any changes associated with climate change and result in a less sustainable groundwater budget." A statement such as the following needs to be included somewhere (if it's not already clear in Sections 7 and 8): "Any increases in irrigated acreage or orchards will need to be offset by conservation or other management actions to maintain groundwater sustainability."
91	5-14 and 5-17	5.2.6		5-4 and 5-5	10/20/2021	Tamara Williams, Stakeholder	p. 5-14. 3rd full paragraph. Please check text vs. figures. The data gap noted "along the Sacramento River to the southeast of Corning" is not shown on either of the referenced figures.
92	5-27	5.4.1.6		5-8	10/20/021	Tamara Williams, Stakeholder	Consider including additional wells in the monitoring network to identify potential salinity increases due to upward migration of poor quality water from the deep zones that are below the base of fresh water. There's a data gap for the TDS SMC on the west side of the basin, where such degradation could occur due to deep wells locally reducing the head and inducing upward flow from the deeper non-potable units. Alternatively, a small separate project could be implemented to gather and evaluate data in that area, with the possibility of expanding the monitoring network or taking other management action.
93	5-31	5.4.3			10/20/021	Tamara Williams, Stakeholder	1st paragraph, 3rd sentence states: "There are currently no prominent spatial data gaps in the groundwater quality monitoring network." See comment on 5.4.1.6 regarding the data gap on the west side of the basin.
94	5-42	5.7.1			10/20/021	Tamara Williams, Stakeholder	p. 5-42. Bulleted list of monitoring well attributes. In addition to screened intervals, please confirm that the DMS includes the gravel packed interval(s) for each well. Many deep wells in this subbasin are gravel packed over a much larger interval than the screens, which can lead to errors in data interpretation.
95	4 of 60	App. 6A		6A-2	10/20/021	Tamara Williams, Stakeholder	Excluding domestic wells greater than 30 years old for this analysis is not protective of domestic well owners, who comprise the outlying rural communities of Tehama County. Many shallow wells much older than 30 years are still in use; the owners have no intention of replacing them simply based on their age. It isn't valid to assume that those well owners should bear the inconvenience and financial burden of replacing or deepening their older shallow functional wells in order to allow uninhibited pumping of deeper (primarily large agricultural) wells that contribute to the lowering of groundwater levels in the aquifer system.
96	6 of 60	App. 6A			10/20/021	Tamara Williams, Stakeholder	While it's not the measurable objective put forward in the current Draft GSP, it's worth noting that the text states: "The measurable objective was refined to be the maximum spring water level in 2012; this value provided more operational flexibility than the initial proposed 2012 minimum values." The concept of operational flexibility (setting objectives that are less protective of shallow wells) appears to be for the benefit of large pumpers and the GSA, since the GSA would be required under SGMA to take action if the measurable objective is not being met. It provides insight into the priorities of the CSAB at that meeting.
97	6-7	6.5	6-1		10/20/021	Tamara Williams, Stakeholder	Chronic Lowering of Groundwater Levels - Minimum Thresholds. The purpose of the 20-ft buffer for Stable Wells, and the 20%-of-minimum-groundwater-depth buffer is unclear. These buffers don't seem protective of shallow wells prior to the 2042 goal for meeting measurable objectives.

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98	6-7	6.5	6-1		10/20/021	Tamara Williams, Stakeholder	**Section 6.6 text--** Chronic Lowering of Groundwater Levels - Undesirable Result. "20% of groundwater elevations measured at RMP wells drop below the associated minimum threshold during 2 consecutive years. If the water year type is dry or critically dry then levels below the MT are not undesirable if groundwater management allows for recovery in average or wetter years." *What does this mean? How many RMP wells are there (20% of RMP wells = ?? wells) Do WLs need to stay below the MT throughout two years, or just drop below for one measurement during each year? When is the water year type announced, and how might that effect the users? How will it be determined that the WLs can recover? What if we don't have an average or wetter year for a long time?* The GSAs shouldn't allow the Corning Subbasin to fall below the MTs, even if DWR doesn't consider it an Undesirable Condition. Making the commitment to sustainability in the face of extreme conditions will provide more assurance that the GSAs remain in control of the Subbasin management. Given the potential dire consequences of not taking action during an extended dry or critically dry period, the GSP should provide a proactive approach to protecting users from low water level conditions during and after "unexpected" dry times. It would be prudent for the GSP to include increased vigilance and protective actions, despite the allowances made in SGMA for the GSAs not being held accountable during those times.
99	6-7	6.5	6-1		10/20/021	Tamara Williams, Stakeholder	**Section 6.8 text -- Degraded Groundwater Quality - Undesirable Result.** "At least 25% of representative monitoring sites exceed the minimum threshold for water quality for two (2) consecutive years at each well where it can be established that GSP implementation is the cause of the exceedance." *What does this mean? 25% of monitoring sites exceed the MT for 2 consecutive years at each well? How many monitoring sites? (25% of monitoring sites = ?? wells) What does "at each well" mean? This doesn't seem to protect against a localized problem caused by overpumping.* Suggest replacing "At least 25% of representative monitoring sites exceed" with *"Any monitoring site exceeds."*
100	6-7	6.5	6-1		10/20/021	Tamara Williams, Stakeholder	**Section 6.10 text.** Depletion of Interconnected Surface Water - The SMCs don't address the potential for impacts to GDEs supported by perched groundwater away from streams. *Include in data gaps and conduct field survey of green areas shown on potential GDE map that are away from the Sacramento River and main creeks. Using the buffered MTs proposed for Chronic Lowering of Groundwater Levels may not be protective of GDEs. I don't think we have sufficient inventory and understanding of the hydrologic requirements of the species in these GDEs. Suggest field surveys of all mapped potential GDEs?*
101	6-10	6.6.2.1			10/20/021	Tamara Williams, Stakeholder	Last paragraph. 2nd sentence. The GSP seems to avoid attributing water level declines to increased pumping for new orchards. Suggest replacing "increased reliance on new wells which lead to increased groundwater pumping" with "increased reliance on groundwater for crops previously irrigated with surface water, and pumping of new wells for new orchards."
102	6-11 and 6-12			6-1 and 6-2	10/20/021	Tamara Williams, Stakeholder	The areas of "Decline" and Slight Decline" in both Shallow and Deep RMP Wells are very similar to the areas delineated as Disadvantaged and Highly Disadvantaged Communities (Figure 2-22). As stated in Section 2.16.2, "Identification of DACs helps ensure the GSP adequately protects all beneficial users."
103	6-13	6.6.2.1			10/20/021	Tamara Williams, Stakeholder	Projected model simulation results. If the simulations indicate that water levels will drop 10-20 feet over the planning period if water use remains the same, shouldn't the GSP be designed to keep the subbasin in balance instead of allowing mining of groundwater to a "new low level" in the face of changing climate conditions? Establishing "buffers below historical groundwater levels to account for projected climate change impacts" is not a sustainable approach to groundwater management.
104	6-13	6.6.2.1			10/20/021	Tamara Williams, Stakeholder	Revised minimum thresholds. I strongly oppose the use of "buffers" below historic low water levels to establish MTs. While this approach might seem easier and more flexible (i.e., less conflict with large pumpers) to gain buy-in and implement in the near term, it has the potential to delay the tough decisions (e.g., pumping restrictions) to a point where the basin can't get avoid being in long-term overdraft.
105	6-20	6.6.2.2			10/20/021	Tamara Williams, Stakeholder	2nd paragraph, 2nd bullet states, "Filter out wells drilled earlier than 1991 (or 30 years old, which is a typical and anticipated lifespan for domestic wells in the area)." SEE COMMENT on APPENDIX 6A, p. 6 of 40.
106	6-20	6.6.2.2			10/20/021	Tamara Williams, Stakeholder	Last sentence. Keeping 25 feet of water above the bottom of a domestic well really isn't conservative, or protective of the well owner; it's practical. Consider deleting this statement.
107	6-21	6.6.2.2			10/20/021	Tamara Williams, Stakeholder	First sentence. For clarity, revise to read, "...approximately 16% of domestic wells ***installed since 1991*** are at risk of getting impacted."
108	6-21	6.6.2.2			10/20/021	Tamara Williams, Stakeholder	Last sentence. Suggest modifying this sentence to read: "As a comparison, fall 2015 groundwater elevation intersected with domestic wells depths showed approximately 4% of those domestic wells potentially dry (Figure 6-7)."
109	6-22 through 6-24	6.6.2.2		6-5, 6-6, and 6-7	10/20/021	Tamara Williams, Stakeholder	It's odd that the well locations don't seem to plot the same on all three of these figures. And some wells are shown on one figure and not the others. Maybe add a brief note explaining why.

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110	6-25	6.2.2.2			10/20/021	Tamara Williams, Stakeholder	Top of page. I disagree with the statement, "...it is impractical to manage a groundwater basin in a manner that fully protects the shallowest wells." The shallowest wells have already gone dry in the absence of aggressive basin and land-use management.
111	6-25	6.2.2.2			10/20/021	Tamara Williams, Stakeholder	1st paragraph, 3rd sentence states, "During the 5-year update to this GSP, a more robust database of domestic wells may be available for the Subbasin in order to estimate potential impacts of minimum thresholds on a well-by-well basis and identify domestic wells that are no longer in use or should be replaced to comply with more recent well standards." How should a shallow well owner respond to this? Please offer something other than a robust database, and a condemnation of their well.
112	6-26	6.2.2.3			10/20/021	Tamara Williams, Stakeholder	Land Subsidence. Provide support for the statement, "However, the potential amount of pumping-induced subsidence should disappear within the 20-year timeframe for achieving sustainability." Maybe explain that the maximum amount of subsidence associated with XX feet of water level decline could be YY feet. If there's irreversible subsidence, it won't "disappear within the 20-year timeframe," but it might not be serious.
113	6-26	6.2.2.3			10/20/021	Tamara Williams, Stakeholder	Depletion of Interconnected Surface Waters. It sounds like the water level MTs are not protective of interconnected surface waters. Is that OK?
114	6-38 and 6-39	6.7.4.1 and 6.7.4.2			10/20/021	Tamara Williams, Stakeholder	6.7.4.1 - last paragraph states: "Low quantities of groundwater in storage during unanticipated future droughts or unanticipated climatic conditions do not constitute an undesirable result." This appears to be the opposite of what's stated on the next page. 6.7.4.2 - 2nd bullet: "Drier than expected conditions may reduce groundwater in storage to an undesirable result." One of these needs to be corrected. It would be good to avoid the confusion between "Undesirable Result" as defined by SGMA, and a result that would be undesirable for groundwater users/uses but not from a SGMA compliance standpoint. Maybe use a term like "actionable" or "red-flag" or "condition of concern," in which case the GSAs would take a conservative approach and commit to evaluating management actions or projects to reduce the risk of long-term unsustainability.
115	6-45	6.8.4.2			10/20/021	Tamara Williams, Stakeholder	2nd paragraph. This discussion implies that, for the purpose of determining undesirable results, implementation of the GSP is limited to GSA projects or activities. It seems that this should extend to water quality degradation resulting from groundwater extraction that would otherwise be allowed under the GSP. In other words, lack of intervention could result in water quality degradation that would be considered an undesirable results.
116	6-61	6.10.2	6-5		10/20/021	Tamara Williams, Stakeholder	The minimum threshold as applied to these near-stream wells does not appear to be protective against the depletion of interconnected surface waters. For this indicator, consider using the minimum Fall groundwater elevation since 2012 for the minimum threshold, with no buffer.
117	6-64	6.10.2.3			10/20/021	Tamara Williams, Stakeholder	In adjacent subbasins, "The methods used to select the minimum thresholds were slightly different in each case but generally result in minimum thresholds that are equivalent to or slightly lower than the historical minimum measured groundwater levels." Using the minimum Fall groundwater elevation since 2012 for the minimum threshold, with no buffer would be more consistent with adjacent subbasin minimum thresholds than including the 20 foot buffer.
118		7.2.4			10/25/2021	Tamara Williams, Stakeholder	Consider incorporating action(s) that could be taken to refine inflow and outflow estimates for the storage simulations such that simulated conditions better reflect measured water levels and trends. (see comment on Section 3.2.8)
119	7-11	7.3.2.1			10/21/2021	Tamara Williams, Stakeholder	Well Management Program. Education and Outreach. This program should provide for well-instrumented aquifer testing by third parties in areas where shallow wells are going dry to better understand the local relationship between deep well pumping and shallow groundwater levels. This will enable a more informed approach to cooperative groundwater management and reaching sustainability. Facilitating conversations between domestic well owners and nearby ag well owners is critical to building the trust needed for an effective GSP.
120	7-12	7.3.2.1			10/21/2021	Tamara Williams, Stakeholder	Well Incident Reporting System. Last sentence. In addition to well owners and drillers, include pump service folks in the outreach and communication for this action.
121	8-3	8.1.2			10/21/2021	Tamara Williams, Stakeholder	4th bullet. Public Outreach and Notification. This is a critical role of the GSAs, and one that needs improvement over the performance during GSP development. Electronic communication is not an effective way to engage the rural community members in this subbasin. Methods such as door-to-door outreach, leafletting or paper mailing, community bulletin boards in local businesses, coverage in local papers (beyond the legal notices that have been placed in the Corning Daily Observer and Red Bluff Daily News), use of marquees, and radio announcements should be budgeted for and pursued.
122	8-4	8.1.3			10/21/2021	Tamara Williams, Stakeholder	Communication and Outreach. This effort must improve going forward. While the Corning Subbasin website is useful for those of us who are comfortable with our computers, many stakeholders simply do not get their information that way. It will be imperative for the GSAs to have a face in the communities they serve.

Corning GSP Public Comments for CSAB Meeting

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123	8-12	8.4.2			10/21/2021	Tamara Williams, Stakeholder	1st paragraph in 8.4.2. The statement, "Results of the various data gaps investigations will be incorporated into the required GSP 5-year update," should be broadened to ensure that annual reports include the evolving understanding of basin conditions. As stated in 8.3.2 Reporting, Annual Reports, "the annual reports may also serve as amendment(s) to the GSP as the monitoring networks are refined and understanding of basin conditions are enhanced."
124	8-12	8.4.2			10/21/2021	Tamara Williams, Stakeholder	Aquifer Testing. The potential objectives of aquifer testing in this subbasin should be clarified. While the criteria identified for wells suitable for including in a aquifer test are valid, it would be useful to describe the purpose of aquifer testing, along with a brief summary of appropriate test methodologies to answer specific questions about subbasin sustainability should be expanded upon. Do we need pumping tests, step tests, constant head tests? Additionally, if a particular well is suspected of causing unacceptable impacts to other users, it shouldn't be excluded from testing just because it doesn't meet all the criteria listed.
125	8-13	8.4.2			10/21/2021	Tamara Williams, Stakeholder	GDE Mapping. GDE mapping shouldn't be limited to areas immediately adjacent to streams. The vigor of native trees and other deep-rooted vegetation should be monitored to ensure that avoidable lowering of shallow groundwater levels aren't contributing to the loss of native vegetation away from streams or wetlands. For example, Valley Oaks are considered groundwater dependent, even though they occur outside the hyporheic zone.
126	8-16	8.7			10/21/2021	Tamara Williams, Stakeholder	Implementation of the Corning Subbasin GSP will need to be closely coordinated with the Red Bluff Subbasin GSP. Please consider having the same technical team involved in both subbasins going forward.
127	8-19 and 8-28	8.8 - 8.10			10/21/2021	Tamara Williams, Stakeholder	The description of Implementation of Projects and Management Actions reads as though no corrective actions will be needed/undertaken in the first 5 years of GSP implementation. Given the declining water levels, and the apparent increase in agricultural pumping, the plan should at least provide the framework, and describe the authority and mechanisms for taking immediate action.
128		7			10/24/2021	Matt Hansen, landowner	**Project and Management Actions:** The water budget implies the subbasin appears to have been stable but is now operating at a deficit. The obvious expansion of water intensive crops, the movement from surface water to groundwater and recent drought conditions are to blame.
129		7			10/24/2021	Matt Hansen, landowner	**Project and Management Actions:** This is not third world agriculture. Management programs aimed at educating local farmers about water efficiency is ludicrous. California farmers are the most efficient users of water because it is expensive. The crops they chose to plant, and ET dictates the amount of water the farmer will need over the course of a year. Because orchardist have developed more efficient micro sprinkler and drip systems, they are capable of planting water intensive orchards in ground that would not otherwise sustain a permanent crop. Management actions need to focus on the groundwater demand and the easiest way to limit the demand is to restrict land use in critically over drafted areas.
130		7			10/24/2021	Matt Hansen, landowner	**Project and Management Actions:** A comprehensive grid of monitoring wells must be established as a priority so informed decisions can be made, and domestic wells can be protected.
131		7			10/24/2021	Matt Hansen, landowner	**Project and Management Actions:** In addition to increased oversight of well construction, orchard development requirements may also benefit groundwater recharge. Containment berms could be built around orchards to hold winter storm water, resulting in more percolation, and less run off.
132		7			10/24/2021	Matt Hansen, landowner	**Project and Management Actions:** Production wells in local areas that hit minimum thresholds should be required to meter and reduce consumption until such time the sustainable management criteria is met. Those failing to meet reduction numbers could be charged for their overage. This could be an alternative to a well moratorium.
133		General			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	the Draft Plan contemplates neither the existence of the Tribe's water rights nor the impact of those rights on the Draft Plan or the viability of management mechanisms contemplateds therein. Those omissions detract from numerous parts of the Draft Plan. Future iterations of the plan must account for these water rights or the plan will remain fundamentally flawed.
134	1-2	1.3.3			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The Paskenta Band is developing its own groundwater monitoring and management plans. The Tribe may share details of these plans with the GSAs at a suitable time and provide coordination with the GSP.

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135	2-3	1.3.3			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	Groundwater in the subbasin is recharged naturally from precipitation, streams, and rivers. Most precipitation occurs during the winter months in the Coast Range. This precipitation is a component of recharge to the aquifer in the subbasin. There is uncertainty to interconnected surface water in the base of the Coast Range foothills in the western portion of the subbasin and the subbasin aquifer. Recharge may occur a great distance from the location of use. During the implementation of the GSP, a better understanding of the connection of surface water and groundwater from the base of the Coast Range foothills should be included. Understanding the western spatial extent of the aquifer and the inflows from the base of the foothills would also support the uncertainties in the water budget and changes in groundwater storage.
136	2-4	2.1.3			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The Paskenta Bands federally reserved water rights have not been accounted for.
137	2-26	2.5.2			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The Tribal Lands are completely reliant on groundwater for drinking water and irrigation, making the implementation of groundwater monitoring and management plans a priority for the protection of their water resources. The GSP does not account for the Tribe's federally reserved water rights, which cover additional future development and water use.
138	3-37	3			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	"Substantial" is not defined in terms of ranges of subsurface inflow from the Coast Range foothills and intermittent drainages. Without a range or error measurement, "substantial" is open to interpretation. Infiltration from precipitation in the drainages of the foothills should be accounted for since contributions to groundwater will likely reach the aquifer beneath the Reservation. The GSP states there is a presence of highly permeable alluvial sediments in and along the subbasin's watercourses, including intermittent or ephemeral streams. There are several intermittent drainages in the western area of the subbasin which are connected to the alluvial, Tehama, and Tuscan aquifers. A better understanding of the volume of recharge from the foothills of the Coast Ranges that reaches the aquifer is needed.
139	3-49	3.2.2.1			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	Groundwater movement is toward the central area of the basin and is directed toward the Reservation. Water quality should be monitored to establish a current baseline, and to recognize any reductions in water quality over time. There is heavy land use for agriculture north of the Reservation and groundwater contamination is possible from pesticides and fertilizers. Groundwater from these agricultural lands flows toward the Reservation, a potential impact to the groundwater supplies for the Reservation.
140	3-49	3.2.2.1			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	As discussed previously, the importance of understanding the volume of water that contributes to the alluvial aquifer will help refine the hydrologic model and ultimately lead to a better understanding of groundwater storage.
141	3-82	3.2.2.2			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	There is an apparent lag effect for recovery of groundwater elevation after prolonged drought in the central area of the Subbasin. Better planning for dry years and distributing surface water supplies can lessen the impact to future groundwater recoveries in the central area of the Subbasin.
142	4-13	4.1.3			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The water budgets cumulative and annual change in storage is declining in the current water budget simulation relative to the historical water budget simulation. This decline appears to be a continuing trend in future water budgets and, if so, the subbasin would continue to experience groundwater level and storage declines compared to historical conditions. The model used to estimate the water budgets is designed from uncalibrated estimates and is susceptible to greater error. Numerical or analytical groundwater flow models may be able to better predict future water budget trends in localized areas of the Subbasin. Then sharing the results and data for the regional hydrological model calibration during GSP implementation.
143	4-16	4.1.4			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The hydrologic model predicts pumping from crop requirements, not real flowrate data. Using actual pumping data and pumping estimates based on well depth and size among other factors, would provide a better estimate of outflow from wells in the water budgets.
144	5-15	5.2.6			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	Currently there are a few localized spatial data gaps for monitoring wells in the western one-third of the subbasin in the limited agricultural land use areas. Understanding groundwater elevations near recharge areas will help understand the inputs to groundwater storage.
145	5-19	5.4			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The well networks should be spatially distributed throughout the Subbasin as data gaps are identified and resolved during implementation of the GSP.
146	6-4	6.2			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	This description omits any mention of the Paskenta Band's federally reserved water rights. The Tribe has a right to water resources, including groundwater, necessary to sustain existing and future needs. The Tribe should be included in the list of agencies with whom coordination is needed.

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147	6-6 to 6-7	6.5			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The Paskenta Band has a federally reserved water right that includes the availability of groundwater on its Reservations. This should be part of the SMC.
148	6-7		6-1		10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	Reduction in groundwater storage (second row), Minimum Threshold refers to groundwater levels "same as chronic lowering of groundwater levels minimum thresholds." There are two minimum thresholds for groundwater levels - one for stable wells and one for declining wells. Are there two thresholds for groundwater storage? If so, an explanation of how this would be applied is needed.
149	6-7		6-1		10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	Degraded groundwater quality (third row), Interim Milestone is "Identical to current conditions." Are the TDS values at all wells currently under the SMCL of 500 mg/L? The Undesirable Result is qualified by "where it can be established the GSP implementation is the cause of the exceedance." Why have this qualification? Shouldn't the GSP be concerned about degraded water quality whatever the cause?
150	6-7		6-1		10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	Depletion of interconnected surface waters (fifth row). Measurement seems to be missing a word. Should it be "A subset of shallow wells used for *monitoring* the chronic lowering of groundwater levels…?"
151	6-13	6.6.2.1			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The minimum threshold for wells with declining groundwater levels was set to the fall of 2012 measurement…" This appears to be different from Table 6-1, which states the minimum threshold for declining wells is "minimum fall groundwater elevation since 2012."
152	6-26	6.6.2.3			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	For land subsidence, the GSP allows that since the groundwater level minimum thresholds are lower than current conditions, that may "temporarily induce additional subsidence in some areas." How do we know this would be temporary?
153	6-27	6.6.2.5			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The urban land uses and users sub-section states that "excessive urban growth is not predicted." This does not account for the Tribe's federally reserved water rights and may conflict with the Paskenta Band's goals. In general, Indian reservations serve as permanent homelands for tribal members and may encompass a wide array of water uses.
154	6-35	6.6.4.3			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	This section discusses the undesirability of having the 20% allowable exceedances occur in the same geographic area. "To avoid this, the monitoring system was developed to have broad geographic coverage, ensuring that minimum threshold exceedances will not be clustered in a single area." It is not clear how having broad coverage in the monitoring system prevents exceedances from occurring in the same area. It seems likely that exceedances would occur in the same area given the zones of similar water trends.
155	7-1	7.1			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	Second set of bullet points, first bullet point. "Additional vetting by all necessary stakeholders, since implementing projects and management actions will be a collaborative effort between the GSAs and coordinating partners such as the USBR, TCCA, and local water districts." This sentence should also include "tribal" in the list of partners.
156	7-2 to 7-7	7.2			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	In general, the Paskenta Band was not consulted or considered in the development of projects and management actions. The Tribe's federally reserved rights are not mentioned in Section 7.2.1. Data from the Tribe is not included in Section 7.2.2. The Tribe is not listed as one of the stakeholders in Section 7.2.3.
157	7-7 to 7-24	7.3			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	While the Paskenta Band is not necessarily opposed to the goals of the GSP, any management actions that impact the Tribe must recognize the Tribe's sovereignty and authority to manage its own resources. The Tribe's participation in the management actions including data sharing, reporting, well management, ordinances, land use, and best management practices must be negotiated independent of any other agency or stakeholder.
158	7-24 to 7-61	7.4			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	See previous comment. Any mitigation project must be evaluated to ensure it does not impact the Paskenta Band's federally reserved water rights or tribal sovereignty. Projects that do potentially impact the Tribe must be negotiated and approved by the Tribe. Otherwise, such activities will risk violating federal law regarding tribal water rights.
159	7-41 to 7-47	7.4.3.4			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	At least one of the mentioned ephemeral creeks (Brannin Creek) has the potential to impact the Paskenta Band. Development of groundwater recharge on this creek and possibly others will require consultation with and approval by the Tribe to the extent they impact the Tribe's interests.
160	7-47 to 7-51	7.4.3.5			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	At least two of the mentioned ephemeral creeks (Brannin Creek and Rice Creek) have the potential to impact the Paskenta Band. Development of off-storage for these creeks or other unnamed tributaries will require consultation with and approval by the Tribe to the extent they impact the Tribe's interests.

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161	7-61	7.5			10/25/2021	Andrew Alejandre Tribal Chairperson Paskenta Band of Nomlaki Indians	The Paskenta Band should be added as one of the entities with whom collaboration will be required.
162		General			10/25/2021	Holly Dawley Glenn-Colusa Irrigation District Water Resources Manager	GCID provided a comment letter supporting the adoption of the GSP by the GSAs to meet the January 31, 2022 deadline for submittal to DWR. Further, GCID expressed concern about groundwater surface water interactions quantification and potential future impacts.
163		7.4.3.6			10/25/2021	Kristina Miller City Manager, City of Corning	**Proposed Priority Project 6** Proposed Priority Project 6 (Section 7.4.3.6) is not thoughtfully considered. All other proposed priority projects include relevant measurable objectives, expected benefits and evaluation of benefits, public noticing, permitting and regulatory processes, circumstances for implementation, implementation schedule, legal authority, and estimated costs. While Priority Project 6 may be a good idea, it needs to be evaluated similar to all other priority projects prior to being included as a priority. Since this project is less developed, Priority Project 6 should be listed as an alternative project.
164					10/25/2021	Kristina Miller City Manager, City of Corning	**Proposed Priority Project 7** The City of Corning already requires LIDs as part of new development projects. Any requirements or costs to increase LIDS to previously developed parcels or the installation of dry wells should not be worn solely by residents and businesses within the city limits of Corning because it benefits the subbasin as a whole.
165	8-6	8.2			10/25/2021	Kristina Miller City Manager, City of Corning	The GSAs are committed to working collaboratively and meeting regularly with other local agencies and stakeholders to implement projects and management actions that achieve the Sustainability Goal. ~~Some activities carried about by the GSAs may receive funding support from local partners. In addition, some activities may be implemented by a local partner using their own sources of funding and not require a financial contribution from the GSAs.~~ The GSAs may coordinate with local partners to incentivize activities that improve sustainable groundwater management and project ~~support their~~ implementation. The GSAs will coordinate with local partners to identify funding mechanisms to support proposed projects and activities located within the respective jurisdictions. Local partners will not be required to solely fund projects within their jurisdiction that benefit the whole.
166		8.2.1			10/25/2021	Kristina Miller City Manager, City of Corning	Grants will be pursued as they become available and based on their applicability to priority implementation activities and projects. The GSAs will coordinate with local partners ~~carrying out~~ on proposed activities and projects within their jurisdictions that support sustainable groundwater management.
167		6.6		6-1 and 6-2	10/25/2021	James Strong General Manager Deseret Farms of California	**Figures 6-1 and 6-2 of the draft GSP should be refined using the "polygon approach."** Section 6.6 of the Sustainable Management Criteria (SMC) chapter, regarding the Chronic Lowering of Groundwater Levels identifies three general zones with similar groundwater level trends. (See Draft GSP, Section 6.6.2.1 (Pg. 6-11).) The grouping of these three general zones, as illustrated in Figures 6-1 and 6-2, demonstrates the variability of groundwater conditions across the Subbasin *using oval shapes.* The "west" general zone demonstrates the area within the Subbasin in which groundwater levels are declining the most. The "central" general zone demonstrates the area within the Subbasin in which groundwater levels are only slightly declining. And finally, the "east" general zone demonstrates the area within the Subbasin in which groundwater levels are stable. Notably, however, this "oval approach" creates overlaps between each of the three general zones. This overlapping could result in unclear data and therefore affect the GSAs' overall understanding of the Subbasin and the unique characteristics of each general zone. To avoid this issue, The GSAs should refine Figures 6-1 and 6-2 using the "polygon approach."
168	6-6	6.4			10/25/2021	James Strong General Manager Deseret Farms of California	**The draft GSP should establish management zones using those newly established polygons.** Currently, the GSAs have not established management areas within the Corning Subbasin. (Draft GSP, Section 6.4 (Pg. 6-6).) Notably, however, the GSAs expressly "reserve the right to establish management areas, if deemed necessary." (*Ibid.)* As noted above, the GSAs have already identified significant differences in three areas within the Subbasin. Accordingly, we do not believe that the GSAs should subject the entire Subbasin and its stakeholders to the same management practices. Instead, we believe that management areas are necessary, and therefore recommend that the GSAs establish such management areas as appropriate to reflect the polygons discussed above, once established. Based on some of the already existing data, it seems that organizing these management areas from east (around the Sacramento River) to west (around steeper terrain) would be best.

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169					10/25/2021	James Strong General Manager Deseret Farms of California	**The draft GSP should revise the Measurable Objectives and Minimum Thresholds** The draft GSP establishes Measurable Objectives (MO) and Minimum Thresholds (MT) for each SMC beyond what is required to achieve the GSA's sustainability goal for the Subbasin. We strive to work with the GSAs in achieving the sustainability goal for the Subbasin and protecting sustainability constructed domestic wells. To further these pursuits, we recommend that the GSAs revise the MOs and MTs to provide landowners with sufficient operating flexibility to help them realistically and timely achieve the purpose of the MOs and MTs, while allowing for flexibility to weather the next 20 years and beyond as we endeavor together to reach sustainability.
170		2			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Provide a map of tribal lands in the subbasin.
171		2			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendations:** Describe the population of each identified DAC and identify the sources of drinking water for DAC members, including an estimate of how many people rely on groundwater (e.g., domestic wells, state small water systems, and public water systems).
172		2			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendations:** Include a map showing domestic well locations and average well depth across the subbasin.
173		3			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Further describe the groundwater elevation data an stream flow data used in the modeling analysis. Discuss screening depth of monitoring wells and ensure they are monitoring the shallow principal aquifer. Discuss temporal (seasonal and interannual) variability of the data used to calibrate the model.
174		3			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Discuss stream reaches in the interior of the subbasin. For example, discuss whether they were included in the groundwater model and discuss relevant depth to groundwater data. Clearly state that they are considered to be disconnected, if that is the case, and what data was utilized to support that conclusion.
175		3			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** To confirm the results of the groundwater modeling analysis, overlay the stream reaches shown with depth-to-groundwater contour maps to illustrate groundwater depths and the groundwater gradient near the stream reaches. For the depth-to-groundwater contour maps, use the best practices presented in Attachment D. Specifically, ensure that the first step is contouring groundwater elevations, and then subtracting this layer from land surface elevations from a Digital Elevation Model (DEM) to estimate depth-to-groundwater along streams and other land surface depressions where GDEs are commonly found.
176		3			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Describe data gaps for the ISW analysis in the ISW section, in addition to the discussion in Section 5 (Monitoring Network). On the ISW map (Figure 3-53), clearly label the areas with data gaps. While the GSP identifies data gaps and their locations in the text, we recommend that the GSP considers any segments with data gaps as potential ISWs and clearly marks them as such on maps provided in the GSP.

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177		3			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Use depth-to-groundwater data from multiple seasons and water year types (e.g., wet, dry, average, drought) to determine the range of depth to groundwater around NC dataset polygons. We recommend that a baseline period (10 years from 2005 to 2015) be established to characterize groundwater conditions over multiple water year types. Refer to Attachment D of this letter for best practices for using local groundwater data to verify whether polygons in the NC Dataset are supported by groundwater in an aquifer.
178		3			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Provide depth-to-groundwater contour maps, noting the best practices presented in Attachment D. Specifically, ensure that the first step is contouring groundwater elevations, and then subtracting this layer from land surface elevations from a DEM to estimate depth-to-groundwater contours across the landscape.
179		3			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Refer to Attachment B for more information on TNC's plant rooting depth database. Deeper thresholds are necessary for plants that have reported maximum root depths that exceed the averaged 30-ft threshold, such as valley oak (Quercus lobata). We recommend that the reported max rooting depth for these deeper-rooted plants be used, if these species are present in the subbasin. For example, a depth-to-groundwater threshold of 80 feet should be used instead of the 30-ft threshold, when verifying whether oak polygons from the NC Dataset are connected to groundwater.
180		3			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** If insufficient data are available to describe groundwater conditions within or near polygons from the NC dataset, include those polygons as "Potential GDEs" in the GSP until data gaps are reconciled in the monitoring network.
181		3			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Include an inventory of the fauna and flora present within the subbasin's GDEs (see Attachment C of this letter for a list of freshwater species located in the Corning Subbasin).
182		4			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Quantify and present all water use sector demands in the historical, current, and projected water budgets with individual line items for each water use sector, including managed wetlands.
183		2			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** In the Communications and Engagement Plan, describe active and targeted outreach to engage DAC members, domestic well owners, and environmental stakeholders throughout the GSP development and implementation phases. Refer to Attachment B for specific recommendations on how to actively engage stakeholders during all phases of the GSP process.
184		2			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Utilize DWR's tribal engagement guidance to comprehensively address all tribes and tribal interests in the subbasin within the GSP. (6)
185		6			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** **Chronic Lowering of Groundwater Levels** - Describe direct and indirect impacts on drinking water users, DACs, and tribes when describing undesirable results and defining minimum thresholds for chronic lowering of groundwater levels.

Comment Number	Page	Subsection	Table	Figure	Date	Commenter/Affiliation	Comment
186		6			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** **Degraded Water Quality** Describe direct and indirect impacts on drinking water users, DACs, and tribes when defining undesirable results for degraded water quality. For specific guidance on how to consider these users, refer to "Guide to Protecting Water Quality Under the Sustainable Groundwater Management Act."
187		6			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** **Degraded Water Quality** Evaluate the cumulative or indirect impacts of proposed minimum thresholds for degraded water quality on drinking water users, DACs, and tribes.
188		6			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** **Degraded Water Quality** Set minimum thresholds and measurable objectives for all water quality constituents within the subbasin. Ensure they align with drinking water standards. (12)
189		6			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Define chronic lowering of groundwater SMC directly for environmental beneficial users of groundwater. When defining undesirable results for chronic lowering of groundwater levels, provide specifics on what biological responses (e.g., extent of habitat, growth, recruitment rates) would best characterize a significant and unreasonable impact on GDEs. Undesirable results to environmental users occur when 'significant and unreasonable' effects on beneficial users are caused by one of the sustainability indicators (i.e., chronic lowering of groundwater levels, degraded water quality, or depletion of interconnected surface water). Thus, potential impacts on environmental beneficial uses and users need to be considered when defining undesirable results in the subbasin (13). Defining undesirable results in the crucial first step before the minimum thresholds can be determined. (14)
190		6			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** When defining undesirable results for depletion of interconnected surface water,include a description of potential impacts on instream habitats within ISWs when minimum thresholds in the subbasin are reached.15 The GSP should confirm that minimum thresholds for ISWs avoid adverse impacts on environmental beneficial users of interconnected surface waters as these environmental users could be left unprotected by the GSP. These recommendations apply especially to environmental beneficial users that are already protected under pre-existing state or federal law. (6,16)
191		6			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** When establishing SMC for the basin, consider that the SGMA statute [Water Code §10727.4(l)] specifically calls out that GSPs shall include “impacts on groundwater dependent ecosystems”.
192		4			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Integrate climate change, including extremely wet and dry scenarios, into all elements of the projected water budget to form the basis for development of sustainable management criteria and projects and management actions.
193		7			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Incorporate climate change scenarios into projects and management actions.

Comment Number	Page	Subsection	Table	Figure	Date	Commenter/Affiliation	Comment
194		5			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Provide maps that overlay current and proposed monitoring well locations with the locations of DACs, domestic wells, tribes, GDEs, and ISWs to clearly identify potentially impacted areas.
195		5			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Increase the number of RMPs in the shallow aquifer across the subbasin as needed to adequately monitor all groundwater condition indicators across the basin and at appropriate depths. Prioritize proximity to DACs, domestic wells, tribes, and GDEs when identifying new RMPs.
196		7			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** For DACs and domestic well owners, include a discussion of whether potential impacts to water quality from projects and management actions could occur and how the GSA plans to mitigate such impacts.
197		7			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** The GSP discusses potential options for additional surface water storage. Note that recharge ponds, reservoirs, and facilities for managed aquifer recharge can be designed as multiple-benefit projects to include elements that act functionally as wetlands and provide a benefit for wildlife and aquatic species. For guidance on how to integrate multi-benefit recharge projects into your GSP, refer to the "Multi-Benefit Recharge Project Methodology Guidance Document."21
198		7			10/25/2021	NGO Consortium (Clean Water Action, Union of Concerned Scientists, Audubon, Local Government Commission, The Nature Conservancy)	**Recommendation:** Develop management actions that incorporate climate and water delivery uncertainties to address future water demand and prevent future undesirable results.
199					10/25/2021	Ritta Martin, Glenn County Farm Bureau	We do not consider the currently proposed per acre fee to be a viable option.
200					10/25/2021	Ritta Martin, Glenn County Farm Bureau	We are also concerned about the dry-land landowners being inadequately represented on the Corning Subbasin board. Currently, there is no one representing the westside / dryland landowners, even though a local landowner offered to represent at the beginning of this process. Over 50% of the Glenn County acreage in the Corning Sub-basin is non-irrigated. In addition, over 70% of the Tehama County acreage is non-irrigated, also without adequate representation.
201		4			10/26/2021	Amy Dutschke Regional Director Bureau of Indian Affairs	**Section 4 – Water Budget, Appendix 4A: Potential Model Uncertainties** The Groundwater Sustainability Plan (GSP) is utilizing existing groundwater modeling (C2VSimFG calibration and data development by DWR) that documents historical groundwater conditions across the Central Valley. The Corning Subbasin GSP lists Sustainability Management Criteria (SMC), Reductions in Storage, but, we were not able to locate the Corning subbasin volume of groundwater storage for the subbasin. It would be useful to list the hydrologic groundwater storage volumes in a table, so the stakeholders have an understanding of the subbasin groundwater storage supply (Section 354.28 of the GSP Regulations).
202	2-21/2-22	Industrial			10/20/2021	Debbie Dotson, stakeholder	I recommend adding MTM Trailer Wash which is a high volume livestock trailer washout located on Road 9 in Orland. It is a 24/7 facility. The facilty has at least a 2,000 gallon holding tank at the wash location and recently another holding tank was added at the well location. There is also another Truck Wash in Corning which should be noted. Both use alot of water.

Comment Number	Page	Subsection	Table	Figure	Date	Commenter/Affiliation	Comment
203	58	6			9/29/2021	Cathy Marcinkevage, NMFS	The locally defined significant and unreasonable conditions for depletions of interconnected surface water (i.e., avoiding depletions beyond those observed in 2015) are likely to negatively affect ESA-listed fish and their habitat, and thus are inappropriate. Basic hydraulic principles dictate that groundwater flow is proportional to the difference between groundwater elevations at different locations along a flow path. Using this basic principle, groundwater flow to a stream or, conversely, seepage from a stream to the underlying aquifer is proportional to the difference between water elevation in the stream and groundwater elevations at locations away from the stream. 2015 was the fifth year of California's recent historical drought, meaning that groundwater levels during fall 2015 likely represent the lowest groundwater elevations ever recorded. These groundwater levels would create historically high streamflow depletion rates, resulting in instream conditions that negatively affect ESA-listed salmonids and green sturgeon, and their critical habitat, including EFH. During the first few years of GSP implementation, the GSA should design and implement studies that better inform appropriate minimum thresholds and measurable objectives for streamflow depletion. Studies should investigate what streamflow depletion rate or volume avoids significantly and unreasonably impacting surface water beneficial uses (e.g., migration, cold-water fishery, and spawning/early development) that support ESA-listed species. In the interim, we suggest the GSA follow guidance by the California Department of Fish and Wildlife (2019) that recommends conservative sustainability management criteria be established to ensure groundwater dependent ecosystem protection.
204		6			9/29/2021	Cathy Marcinkevage, NMFS	The proposed minimum thresholds and measurable objectives for streamflow depletion are also inappropriate for the same reasons as outlined above. A groundwater elevation threshold set at "the minimum fall groundwater elevation since 2012 minus a 20-foot buffer" will lead to historically high streamflow depletion consistent with California's recent historical drought. Furthermore, the draft section does not appear to adequately address the following requirement for minimum thresholds as spelled out in the SGMA regulations: "The relationship between the minimum thresholds for each sustainability indicator, including an explanation of how the Agency has determined that basin conditions at each minimum threshold will avoid undesirable results for each of the sustainability indicators." (CCR 23 §354.28(b)(2)) Any proposed minimum threshold for streamflow depletion should include a rational, fact-based discussion of how the threshold will avoid significant and unreasonable impacts to surface water beneficial uses. The draft Section 6 does not include this required component.
205		6			9/29/2021	Cathy Marcinkevage, NMFS	Please include ESA-listed salmon, steelhead, and sturgeon as identified beneficial users of interconnected surface water.
206		6			9/29/2021	Cathy Marcinkevage, NMFS	The draft section contains the following sentence: "Considering all the beneficial uses and users, the CSAB determined that surface water depletion was not significant and unreasonable in 2015 for the Subbasin stream reaches of the Sacramento River, Stony Creek, or Thomes Creek." The above sentence begs several questions. Were salmon, steelhead, and green sturgeon considered as a beneficial user of surface water? What identified beneficial uses were considered? What monitoring for undesirable results was undertaken in 2015, and what were the results of that monitoring? What reasoning was offered by the Corning Subbasin Advisory Board (CSAB) regarding why 2015 depletion rates, which again were likely historically high, were not significant and unreasonable? The GSA should elaborate fully on the reasoning why surface water depletion was not significant and unreasonable in 2015.
207		7			9/29/2021	Cathy Marcinkevage, NMFS	**NMFS recommendation for future Projects and Management Actions:** We suspect that groundwater recharge projects are likely to be an important action implemented as part of the effort to achieve groundwater sustainability in the Corning subbasin. NMFS encourages the GSA to consider implementing recharge projects that facilitate floodplain inundation, which offer multiple benefits including downstream flood attenuation, groundwater recharge, and ecosystem service. Managed floodplain inundation can recharge floodplain aquifers, which in turn slowly release stored water back to the stream during summer months. These projects also reconnect the stream channel with floodplain habitat, which can benefit juvenile salmon, steelhead, and sturgeon by creating off-channel habitat characterized by slow water velocities, ample cover in the form of submerged vegetation, and high food availability. As an added bonus, these types of multi-benefit projects likely have more diverse grant funding streams that can lower their cost as compared to traditional off-channel recharge projects. NMFS stands ready to work with any GSA interested in designing and implementing floodplain recharge projects.

CSAB Schedule & Objectives

The Corning Sub-Basin Advisory Board (CSAB) will meet monthly on the first Wednesday of the month from 1:30 to 3:30 pm (4:00 pm starting March 2021) during the GSP development phase. Meetings are planned from April 2020 through approximately December 2021. This meeting schedule outlines the anticipated schedule and the key discussion topics for each meeting. It will be updated to reflect the most current information, as warranted.

Date	Key Meeting Topics	CSAB Meeting Objectives
2020		
Apr	• CSAB Overview • GSP Development • Groundwater Data • Overview of Data Management System and Model • Sustainable Management Goal Example • Interests & Concerns	• Provide background on Corning GSP framework • Collection of groundwater data • Collection of interests • Introduce potential Sustainability Goal for Subbasin • Public Comment
June	• Draft Hydrogeologic Conceptual Model and groundwater conditions • Modeling platform selection • GSP review process	• CSAB Recommendations and questions for Hydrogeologic Conceptual Model and Groundwater Conditions • Make a recommendation on model platform to use for GSP work • Public Comment

Date	Key Meeting Topics	CSAB Meeting Objectives
July	• Current and Historical draft Water Budgets • Model overview • Potential management areas	• Review of what is perceived as historic and current unsustainable groundwater use based on water budget • Public Comment
Aug	• Monitoring Networks • Overview of Sustainable Management Criteria and approach to development • Draft Sustainability Goal	• Answer questions on monitoring networks • Gather initial feedback on process for developing SMCs • Discuss Sustainability Goal • Public Comment
Sept	• Groundwater Level SMC discussion #1 - background on Groundwater Levels SMC • Proposed approaches for MT and MO	• Input on proposed approaches for MT and MO development • Public Comment
Oct 7	• Groundwater Level SMC discussion #2 - proposed groundwater level MT and MO • Initial Discussion on Potential Projects and Management Actions	• Recommendations on proposed groundwater level MT and MO • Input on Projects and Actions • Public Comment
Nov 4	• Integrated Model Updates • Overview of current, historical and projected water budgets	• Answer questions on modeling and water budgets • Public Comment
Dec 2	• Open Discussion on GSP Sections 1 and 2	• Receive feedback on Draft GSP Sections 1 and 2 provided and available on Corning GSP website • Answer any additional GSP questions
2021		
Jan 6	• Open Discussion on GSP Section 3	• Receive feedback on Draft GSP Section 3 provided and available on Corning GSP website • Answer any additional GSP questions
Feb 3	• Depletion of interconnected surface water SMC discussion #1 - background on Subbasin streams and introduction to SMC • Overview of Groundwater Dependent Ecosystems (GDEs) approach • ~~Land subsidence SMC discussion #1 - background on Subbasin conditions and introduction to SMC~~	• Input on significant and unreasonable conditions and initial discussion on MT development • Public Comment
Mar 3	• ~~Depletion of interconnected surface water SMC discussion #2 – review SMC approaches~~ • Land subsidence SMC discussion #1 – review SMC approaches	• Input on proposed approaches for MT and MO development • Discussion of undesirable results • **Potential recommendations to GSA Boards for Lowering of GWLs SMC** • *Public Comment*
Apr 7	• Land subsidence SMC discussion #2 – review SMC approaches • Review projected water budgets and GSP requirements; introduction to storage SMC • Initial discussion on potential projects and management actions	• Input on significant and unreasonable conditions and initial discussion on MT development • **Potential recommendations to GSA Boards for subsidence SMC** • Input on potential projects and management actions • *Public Comment*

Date	Key Meeting Topics	CSAB Meeting Objectives
May 5	• Discussions and development of SMCs for Groundwater Quality • Review SMC approaches for Interconnected SW depletion SMC • Continue discussion on projects and management actions	• Input on significant and unreasonable conditions and initial discussion on SMC development • *Public Comment*
June 2	• Recap SMC for all sustainability indicators	• **Potential recommendations to GSA Boards on groundwater levels, storage, water quality, subsidence, and depletion of interconnected surface water SMC** • *Public Comment*
July 7	• Revised List of Projects & Management Actions • Introduction to funding mechanisms	• Input on revised list of Projects & Management Actions • Discussion on potential funding mechanisms • *Public Comment*
Aug 4	• Review public feedback on Sections 5 and 6 • Discuss priority actions for plan implementation, including data gaps • Evaluate funding mechanisms • Review grant opportunities	• Solicit feedback on Sections 5 and 6 • Receive input on Plan Implementation and plans for addressing data gaps • Recommendations on funding mechanisms • Identify potential grant funding opportunities • *Public Comment*
Sept 1	• Review final draft GSP • Remaining questions and comments • Moving towards GSP implementation	• **Approve release of Draft GSP for public review** • *Public Comment*
Oct	***Draft Final GSP posted on website for public review – no CSAB meeting; 2 public meetings, 1 in-person meeting (October 4th), and 1 webinar (October 13th)***	
Nov 10	• Review public comments on GSP • Review potential revisions to GSP for finalization	• Understanding of the refinements to the GSP based on the comments received. • **Potential recommendation to approve GSP for adoption by the GSA Boards** • *Public Comment*
Dec *(if needed)*	• Recommendation for Adoption of Groundwater Sustainability Plan to Groundwater Sustainability Agencies	• Recommendations for Adoption of Groundwater Sustainability Plan to Groundwater Sustainability Agencies • *Public Comment*

Acronyms:

- CSAB: Corning Subbasin Advisory Board
- GSA: Groundwater Sustainability Agency
- GSP: Groundwater Sustainability Plan
- GWL: Groundwater level
- MT: Minimum Threshold
- MO: Measurable Objective
- RMP: Representative Monitoring Plan
- SGMA: Sustainable Groundwater Management Act
- SMC: Sustainable Management Criteria
- UR: Undesirable Result

9. *Approve 2022 Corning Sub-basin GSA Committee meeting schedule

In 2021, the CSGSA generally met every two months. In 2022, the GSA will be shifting from GSP planning to implementation. Two meeting schedule options are attached for consideration. The CSGSA may consider additional options.

Attachments:

- Draft 2022 CSGSA Meeting Schedule Options

DRAFT CSGSA 2022 Meeting Schedule Options

Option 1

Meetings of the Corning Sub-basin GSA Committee will generally be held on the 2nd Wednesday every 2nd month. Meetings will be held at the Glenn-Colusa Irrigation Pump Station located at 7854 County Road 203, Orland, CA 95963. Exceptions are noted below.

Date	Time	Location
January 12, 2022	9:30 am	7854 County Road 203, Orland, CA
March 9, 2022	9:30 am	7854 County Road 203, Orland, CA
May 11, 2022	9:30 am	7854 County Road 203, Orland, CA
July 13, 2022	9:30 am	7854 County Road 203, Orland, CA
September 14, 2022	9:30 am	7854 County Road 203, Orland, CA
November 9, 2022	9:30 am	7854 County Road 203, Orland, CA

Note: Meetings may be conducted by teleconference when allowed under special circumstances such as following the conditions of AB 361 or Executive Orders allowing such meetings.

Option 2

Meetings of the Corning Sub-basin GSA Committee will generally be held on the 2nd Wednesday every month. Meetings will be held at the Glenn-Colusa Irrigation Pump Station located at 7854 County Road 203, Orland, CA 95963. Exceptions are noted below.

Date	Time	Location
January 12, 2022	9:30 am	7854 County Road 203, Orland, CA
February 9, 2022	9:30 am	7854 County Road 203, Orland, CA
March 9, 2022	9:30 am	7854 County Road 203, Orland, CA
April 13, 2022	9:30 am	7854 County Road 203, Orland, CA
May 11, 2022	9:30 am	7854 County Road 203, Orland, CA
June 8, 2022	9:30 am	7854 County Road 203, Orland, CA
July 13, 2022	9:30 am	7854 County Road 203, Orland, CA
August 10, 2022	9:30 am	7854 County Road 203, Orland, CA
September 14, 2022	9:30 am	7854 County Road 203, Orland, CA
October 12, 2022	9:30 am	7854 County Road 203, Orland, CA
November 9, 2022	9:30 am	7854 County Road 203, Orland, CA
December 14, 2022	9:30 am	7854 County Road 203, Orland, CA

Note: Meetings may be conducted by teleconference when allowed under special circumstances such as following the conditions of AB 361 or Executive Orders allowing such meetings.

Draft 12/8/21

10. Corning Sub-basin GSA Committee Member Reports and Comments

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

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11. Next Meeting

The next meeting will be determined during Item 9.

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12. Adjourn

The meeting will be adjourned.