Wyandotte Creek
GROUNDWATER SUSTAINABILITY AGENCY

lwa
LARRY WALKER ASSOCIATES

DRAFT Amended

GROUNDWATER SUSTAINABILITY PLAN

WYANDOTTE CREEK GROUNDWATER SUBBASIN

Prepared by

Wyandotte Creek Groundwater Sustainability Agency
308 Nelson Avenue
Oroville, CA, 95965

In Consultation with

Larry Walker Associates, Inc.
1480 Drew Avenue, Suite 100
Davis, California 95618

December 17, 2026

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December 17, 2027

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Wyandotte Creek Advisory Committee

Wyandotte Creek Management Committee

Cooperating Agencies

South Feather Water and Power Agency

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Geosyntec Consultants / Davids Engineering

2027 Amended GSP
Larry Walker Associates

Luhdorff & Scalmanini, Consulting Engineers

Projects and Management Actions

Larry Walker Associates

GEI Consultants

West Yost

In Remembrance of Byron Alan Clark, PE
(February 4, 1976 - April 3, 2021)
With thanks for his excellent leadership and foundational work
on the Basin Setting Project for the Wyandotte Creek Subbasin GSP

PREFACE

Development of the Wyandotte Creek Subbasin Groundwater Sustainability Plan (GSP), like many others throughout California, has coincided with one of the most severe and extensive droughts that has ever gripped the western United States. As of this writing in December 2021, as the final Wyandotte Creek Subbasin GSP is being assembled, drought conditions throughout most of California, including the Wyandotte Creek Subbasin (Subbasin), are classified as "exceptional", the most extreme classification defined by the U.S. Drought Monitor (USDM).[1] Historically, observed impacts during exceptional drought generally include: widespread water shortages, depleted surface water supplies, extremely low federal and state surface water deliveries, curtailment of water rights, extremely high surface water prices, increased groundwater pumping to satisfy water demands, dry groundwater wells, increased well drilling and deepening, increased pumping costs, wildfire, decreased recreational opportunities, and poor water quality, among other potential impacts reported by the USDM. All of these conditions are currently being experienced to some degree across California and, some of them within the Subbasin.

As of November 29, 2021, the County of Butte had received 44 reports of dry wells through the My Dry Water Supply Reporting System, and another approximately 20 from residents calling the Butte County Department of Water and Resource Conservation. While a number of the reported dry wells are in the foothills outside of the Subbasin, a handful lie within the Wyandotte Creek Subbasin. Most reported dry wells are used for domestic water supply. Counts of dry wells are likely to be low because some landowners choose not to report well problems to the county.

At the State level and as a result of the unprecedented dry conditions, Governor Gavin Newsom declared a drought emergency on April 21, 2021, which was subsequently expanded on May 10 to include new drought-impacted areas including the Sacramento-San Joaquin Delta Watershed. Most recently, on October 19, Governor Newsom issued a proclamation extending the drought emergency statewide. On August 20, the State Water Resources Control Board (SWRCB) issued surface water curtailment orders to approximately 4,500 water right holders in the Sacramento-San Joaquin Delta Watershed to protect drinking water supplies, prevent salinity intrusion into fresh water supplies, and minimize impacts to fisheries and the environment. Given the recent curtailments and an already bleak surface water supply condition, there is an increased reliance on groundwater in the region. Currently, all of California's 58 counties have declared drought emergencies, including Butte County.

The reported numbers of dry wells discussed above prompted mitigation and response actions by the county. The county is tracking the well water shortage reporting to identify localized areas where wells are going dry and/or where other groundwater issues may exist. The county is also supporting the public through local and regional programs offered through the county, such as providing an emergency potable water filling station. The county has also applied for drought relief funding through the Department of Water Resources (DWR or Department). At this time, prior to completion and adoption of the GSP, drought response efforts in the Subbasin are the responsibility of the county, cities, and other local agencies. At some point following adoption of

[1] The U.S. Drought Monitor (https://droughtmonitor.unl.edu/) is produced through a partnership between the National Drought Mitigation Center at the University of Nebraska-Lincoln, the United States Department of Agriculture, and the National Oceanic and Atmospheric Center. Information for the State of California is available online at: https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA.

the GSP, those responsibilities may be coordinated more closely with the GSA. Additional coordination with the county, cities, and local agencies would ensure preservation of public health and safety (the purview of the counties and cities) and groundwater sustainability for all beneficial users and uses (the purview of the GSA).

Technical work and related public involvement processes supporting development of the Wyandotte Creek Subbasin GSP began in earnest in 2018 and are nearing completion as of December 2021. Development of the GSP has utilized the best available science and tools, with the most sufficient and credible information and data available for the decisions being made and the time frame available for making those decisions. Current and historical groundwater conditions and water budgets have been evaluated for the Subbasin in alignment with the GSP regulations. The technical work is based primarily on historical records of surface water and groundwater conditions from 1970 through 2018 which includes the prior drought conditions from approximately 2007 to 2015, but not the current drought in 2020 to 2021.

Unfortunately, drought conditions in 2020 and 2021 have coincided with development of the GSP, a timing that has not permitted complete evaluation and inclusion of data from these years in the GSP at this time. Due to the schedule mandated by the Sustainable Groundwater Management Act (SGMA) for completion of GSPs by January 31, 2022, it has not been possible to include conditions that have manifested due to the current drought in development of the GSP. Records of drought-related conditions in 2020 to 2021 will not be systematically compiled, quality-controlled, and made publicly available until after the Wyandotte Creek Subbasin GSP has been adopted. However, those conditions will be factored into the required GSP annual reports and particularly the periodic (five-year) evaluations as they become available.

Ongoing management of the Subbasin under the GSP will follow an “adaptive management” strategy that involves active monitoring of Subbasin conditions and addressing any challenges related to maintaining groundwater sustainability by scaling and implementing projects and management actions (PMAs) in a targeted and proportional manner in accordance with the needs of the Subbasin. Notwithstanding the information noted above regarding the challenges with GSP preparation and the current drought, some of the planned projects contained within this GSP could be fast tracked to address impacts associated with the current drought. GSP annual reports provide an opportunity each year to review current Subbasin conditions. Using annual reporting information, the Wyandotte Creek GSA Board can assess the need for further PMAs. During the periodic five-year evaluations, the GSP will also be reviewed and revised, as needed and as more is known about the effects of current and future conditions.

The Wyandotte Creek GSA and the stakeholders within the Subbasin recognize that this GSP is not the finish line; it is the starting line for sustainable management of the Subbasin. As conditions within the Subbasin change, the GSA is committed to an open, transparent, and all-inclusive adaptive management strategy aimed at tackling the important local issues that they face. At the heart of SGMA is the power for locals to solve local problems with local resources. All parties in the Subbasin are committed to doing just that.

The GSP was approved by the DWR in July 2023. DWR provided recommended corrective actions (or RCAs) that the Department believes will enhance the original GSP. The Department strongly encouraged completion of the recommended corrective actions and suggested incorporating all resulting changes to the GSP in future updates. During the development of the GSP, the Wyandotte Creek GSA identified data gaps and DWR suggested resolving these data gaps as part of the corrective actions. Wyandotte Creek GSA received funding through DWR’s

Sustainable Groundwater Management (SGM) Round 2 Grant Program (2024-2026) to address these data gaps and to complete the accompanying 2027 GSP Periodic Evaluation required under Water Code § 10728.2 and Plan Amendments (as applicable). This amended GSP includes updates to address DWR's RCAs.

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ACRONYMS AND ABBREVIATIONS

µS/cm	microsiemens per centimeter
AB	Assembly Bill
ACS	American Community Survey
AEM	aerial electromagnetic
AFY	acre-feet per year
Agreement	Joint Powers Agreement
amsl	above mean sea level
BBGM	Butte Basin Groundwater Model
BCDWRC	Butte County Department of Water and Resource Conservation
bgs	below ground surface
BMOs	Basin Management Objectives
BMPs	Best Management Practices
C&E Plan	Communication and Engagement Plan
Cal Water	California Water Service
CASGEM	California Statewide Groundwater Elevation Monitoring
CCR	California Code of Regulations
CDEC	California Data Exchange Center
CDFW	California Department of Fish and Wildlife
CECs	Chemicals of Emerging Concern
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CNRA	California Natural Resources Agency
CRC	California Rice Commission
CVRWQCB	Central Valley Regional Water Quality Control Board
DACs	Disadvantaged Communities
DMS	data management system
Drought Plan	Butte County Drought Preparedness and Mitigation Plan
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EPA	Environmental Protection Agency
GAMA	Groundwater Ambient Monitoring and Assessment
GDEs	Groundwater Dependent Ecosystems

GIS	geographical information systems
GQTMWP	Groundwater Quality Trend Monitoring Work Plan
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HCM	Hydrogeologic Conceptual Model
HVA	High Vulnerability Area
iGDEs	potential groundwater dependent ecosystems
ILRP	Irrigated Lands Regulatory Program
IM	interim milestones
InSAR	Interferometric Synthetic Aperture Radar
IRWM	Integrated Regional Water Management
JPL	Jet Propulsion Laboratory
LID	Low Impact Development
MA	Management Area
MAF	million acre-feet
MCL	maximum contaminant level
mg/L	milligrams per liter
MGD	million gallons per day
MHI	median household income
MO	measurable objective
MT	minimum threshold
NASA	National Aeronautics and Space Administration
NCCAG	Natural Communities Commonly Associated with Groundwater
NEPA	National Environmental Policy Act
NR	Not yet reported
NRCS	Natural Resources Conservation Service (
OSWCR	Online System for Well Completion Reports
RMS	representative monitoring sites
SAGBI	Soil Agricultural Groundwater Banking Index
SB	Senate Bill
SBFCA	Sutter Butte Flood Control Agency
SDACs	Severely Disadvantaged Communities
SFWPA	South Feather Water and Power Agency

SGMA	Sustainable Groundwater Management Act
SI	Sustainability Indicators
SMC	sustainable management criteria
SOI	Sphere of Influence
SVWQC	Sacramento Valley Water Quality Coalition
SWRCB	State Water Resources Control Board
TAF	thousands of acre-feet
TAF/year	thousand acre-feet per year
TBD	to be decided
TDS	total dissolved solids
TNC	The Nature Conservancy
TSS	Technical Support Services
TWSD	Thermalito Water and Sewer District
URCs	Underrepresented Communities
USACE	United States Army Corps of Engineers
USBR	United States Bureau of Reclamation
USDA	United States Department of Agriculture
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
WAC	Wyandotte Creek Advisory Committee
WDL	Water Data Library
Wyandotte Creek Subbasin	Wyandotte Creek Groundwater Subbasin

EXECUTIVE SUMMARY

Sustainability Goal:

To ensure that groundwater is managed to provide a water supply of adequate quantity and quality to support beneficial users of groundwater including but not limited to rural areas and other communities, the agricultural economic base of the region, and environmental resource uses in the Subbasin now and in the future.

Introduction

In 2014, the California legislature enacted the Sustainable Groundwater Management Act (SGMA) in response to continued overdraft of California's groundwater resources. SGMA provides for local control of groundwater resources while requiring sustainable management of the state's groundwater basins. Under the provisions of SGMA, local agencies must establish governance of their subbasins by forming Groundwater Sustainability Agencies (GSAs) within the authority to develop, adopt, and implement a Groundwater Sustainability Plan (GSP or Plan) for the subbasin. Under the GSP, GSAs must adequately define and monitor groundwater conditions in the subbasin and establish criteria to maintain or achieve sustainable groundwater management within 20 years of GSP adoption. Within the framework of SGMA, sustainability is generally defined as long-term reliability of the groundwater supply and the absence of undesirable results.

Critical Dates for the Wyandotte Creek Groundwater Subbasin	
2022	By January 31, submit GSP to Department of Water Resources (DWR)
2027	Evaluate GSP and amend, if warranted
2032	Evaluate GSP and amend, if warranted
2037	Evaluate GSP and amend, if warranted
2042	Achieve sustainability for the Wyandotte Creek Subbasin

The Wyandotte Creek Groundwater Subbasin (Wyandotte Creek Subbasin) is identified by DWR as being in a medium priority subbasin. For medium priority basins, SGMA required preparation of the GSP by January 31, 2022. The Wyandotte Creek GSA is the only GSA in the Wyandotte Creek Subbasin. The Wyandotte Creek GSA was formed through the execution of a Joint Powers Agreement (Agreement) by the County of Butte, City of Oroville, and the Thermalito Water and Sewer District (TWSD). The GSA Board is composed of five seats, each with equal and full voting rights, including Butte County, City of Oroville, TWSD, an agricultural groundwater user, and a domestic well user (non-agricultural).

The purpose of the Agreement was to create the Wyandotte Creek GSA to 1) to develop, adopt, and implement a GSP for the Wyandotte Creek subbasin to implement SGMA requirements and achieve the sustainability goals; and 2) involve the public and subbasin stakeholders through outreach and engagement in developing and implementing the GSP. The focus of the Agreement is to maximize local input and decision-making and address the different water demands and sustainability considerations in the urban and rural areas of the Wyandotte Creek Subbasin.

The agreement also defines two Management Areas (MAs) within the Wyandotte Creek Subbasin: Wyandotte Creek Oroville and Wyandotte Creek South. MA refers to an area within a subbasin for which a GSP may identify different minimum thresholds (MTs), measurable objectives (MOs), monitoring, and projects and management actions based on unique local conditions or other circumstances as described in the GSP regulations. The interests and vulnerability of stakeholders and groundwater uses in these MAs vary based on the nature of the water demand (agricultural, domestic, municipal), numbers and characteristics of wells supplying groundwater, and to some degree the hydrogeology and mix of recharge sources.

SGMA requires development of a GSP that achieves groundwater sustainability in the Wyandotte Creek Subbasin by 2042. A pragmatic approach to achieving sustainable groundwater management requires an understanding of 1) historical trends and current groundwater conditions in the subbasin, based on evaluating six sustainability indicators (SIs) that include groundwater levels, groundwater storage, groundwater quality, land subsidence, depletion of interconnected streams, and seawater intrusion and 2) what must change in the future to ensure sustainability without causing undesirable results (described and defined in Chapter 3) or negatively impacting beneficial uses and users of groundwater, including groundwater dependent ecosystems (GDEs).

The GSP is organized as follows and the various components of each chapter are summarized further below:

1. Chapter 1: Plan Area. This chapter includes agency information, description of the Plan Area, and applicable programs and data sources used to prepare the GSP as well as a description of beneficial users and uses within the Basin and a summary of stakeholder communications and engagement.
2. Chapter 2: Basin Setting. This chapter discusses the Hydrogeologic Conceptual Model (HCM), groundwater conditions and water budget.
3. Chapter 3: Sustainable Management Criteria. This chapter discusses undesirable results, identifies the minimum thresholds, and measurable objectives for each of the six SIs.
4. Chapter 4: Monitoring Network. This chapter describes the methods used to monitor the SIs.
5. Chapter 5: Project Management Actions. This chapter describes projects and management actions that will achieve sustainability within the Subbasin.
6. Chapter 6: Plan Implementation. This chapter describes how the GSA will partner with other groundwater users to implement the GSP to achieve groundwater sustainability.

The GSP outlines the need to address overdraft and related conditions and has identified 15 projects for potential development that either replace groundwater use (offset) or supplement groundwater supplies (recharge) to meet current and future water demands. During the 2022-2027 implementation period, several projects received funding and were completed or began feasibility studies including the Regional Conjunctive Use Project and the Thermalito Water Treatment Plant Capacity Upgrade. In addition, the GSP also identifies five management actions that can be implemented to focus on reduction of groundwater demand. During the 2022-2027 implementation period, several management actions have completed work or begun activities.

Although current analysis indicates that groundwater pumping offsets and/or recharge on the order of 1,000 acre-feet per year (AFY) may be required to achieve sustainability, additional efforts are needed to confirm the level of pumping offsets and/or recharge required to achieve sustainability. These efforts include collecting additional data and a review of the Wyandotte Creek Subbasin groundwater model, along with other efforts as outlined in the GSP.

In 2027, this amended GSP this amended GSP was submitted to DWR in response to the Recommended Corrective Actions (RCAs) provided in DWR's Determination Letter.[2] This amended GSP incorporates DWR's RCAs as summarized in Table ES-1. The Amended GSP updates SMCs and networks for nearly all sustainability indicators (SI). SI that previously used the groundwater level SI as a proxy have their own established networks and SMCs, including for land subsidence and stream depletions. This GSP updated key sections with new data and analysis, including interconnected surface water and groundwater dependent ecosystems. The sustainable yield has been updated to reflect updated data collection for groundwater pumping and groundwater levels through Water Year 2025. Projects and management actions have been updated based on recent efforts that have occurred since the initial adoption of the GSP in 2021.

[2] Wyandotte Creek Subbasin Determination Letter is available for download here: https://sgma.water.ca.gov/portal/gsp/preview/99

Table ES-1: Summary of DWR Recommended Corrective Actions and Amendments.

Determination Letter Page No.	GSP Section No.	GSP Section	Recommended Corrective Action (RCA)	Amendment Description
39	2.2.4.2	Basin Setting - Groundwater Quality	**RCA 1a:** Provide additional information in the GSP outlining the location and extent of contamination plumes, identifying which constituents are being monitored under various programs, and thoroughly describing ongoing remediation efforts within the Subbasin.	Explicitly listed and described all existing contamination sites and the corresponding responsible agency and/or mitigation program.
40	2.2.4.1	Basin Setting - Groundwater Quality	**RCA 1b:** Evaluate whether groundwater management actions, including production and/or replenishment under the jurisdiction of the GSA, may influence the migration of contaminant plumes.	Evaluation of water quality data did not reveal significant impacts from pumping; the GSA is currently working on a handout to give to project partners that highlights locations in the Subbasin with water quality problems that could impact project feasibility.
40	2.2.4.1	Basin Setting - Groundwater Quality	**RCA 1c:** Investigate if groundwater quality issues are adversely impacting groundwater supply and beneficial uses and provide information if there are any mitigation programs in place and the effectiveness of such programs.	Evaluation of water quality data did not reveal significant impacts from pumping; existing contamination sites with corresponding mitigation program were listed and described.
40	2.2.4.1	Basin Setting - Groundwater Quality	**RCA 1d:** Coordinate with the lead agencies overseeing these remediation sites regularly and update the Plan stating how existing groundwater quality conditions and/or remediation efforts may impact the GSA's ability to manage groundwater.	Updated description of coordination efforts regarding water quality.
40	3.3.1	Sustainable Management Criteria - Groundwater Levels - Undesirable Result	**RCA 2a:** Revise the definition of undesirable results and language pertaining to significant and unreasonable lowering of groundwater level to remove the non-dry year condition or discuss how extractions and recharge will be managed as necessary to ensure that reductions in groundwater levels or storage during dry years are offset by increases in groundwater levels or storage during other years within the sustainable	The definition of undesirable results was updated to remove the non-dry year condition; PMAs were also updated (5.2.4) to describe benefits from recent water supply reliability and recharge projects benefits.

Determination Letter Page No.	GSP Section No.	GSP Section	Recommended Corrective Action (RCA)	Amendment Description
			management criteria for the chronic lowering of groundwater levels.	
40	3.3.2	Sustainable Management Criteria - Groundwater Levels - Minimum Thresholds	**RCA 2b:** Provide information on impacts to domestic wells during projected conditions where minimum thresholds are exceeded but undesirable results do not occur and quantify domestic wells that will be impacted by the proposed minimum threshold. Furthermore, the GSA should evaluate the impacts of proposed minimum thresholds on other beneficial uses and users, such as public and small water systems and environmental users and users as the GSP does not evaluate those impacts.	Expanded data collection efforts on GDEs (2.2.7.6) and ISW monitoring (4.6); quantified impacts to domestic wells (Appendix 3-B).
40	3.3.2	Sustainable Management Criteria - Groundwater Levels - Minimum Thresholds	**RCA 2c:** Provide a description of the relationship between established minimum thresholds for the chronic lowering of groundwater levels and how they avoid undesirable results for each of the other sustainability indicators.	Changed MT approach for lowering groundwater levels to be more reflective of undesirable result definition.
40	3.5.1	Sustainable Management Criteria - Water Quality - Undesirable Result	**RCA 3:** Revise the definition of undesirable results to remove the non-dry year condition or discuss how degradation during dry period will be managed as necessary to ensure that adverse water quality conditions are offset during other periods.	The definition of undesirable results was updated.
41	3.7.1	Sustainable Management Criteria - Land Subsidence - Undesirable Result & MT	**RCA 4a:** Provide a clear, quantitative definition of when undesirable results for land subsidence may occur in the Subbasin, as required by the GSP Regulations, to support the selection of land subsidence minimum thresholds that demonstrate avoidance of undesirable results.	The definition of undesirable results was updated.

Determination Letter Page No.	GSP Section No.	GSP Section	Recommended Corrective Action (RCA)	Amendment Description
41	3.7.1	Sustainable Management Criteria - Land Subsidence - Undesirable Result & MT	**RCA 4b:** Establish sustainable management criteria for land subsidence for the Subbasin utilizing a monitoring network that directly measures land elevation change such as remote sensing data, survey monuments, or global positioning system stations.	The GSA has established annual monitoring protocol for subsidence using surveyed wells, InSAR data, and local GPS stations for ground-truthing.
41	3.8.1	Sustainable Management Criteria - ISW	**RCA 5a:** Consider utilizing the interconnected surface water guidance, as appropriate, when issued by the Department to establish quantifiable minimum thresholds, measurable objectives, and management actions.	The GSA has reviewed the guidance released to date; the guidance was taken into consideration during the Periodic Evaluation and Plan Amendment process.
41	4.6	Monitoring Networks - ISW	**RCA 5b:** Continue to fill data gaps, collect additional monitoring data, and implement the current strategy to manage depletions of interconnected surface water and define segments of interconnectivity and timing.	ISW monitoring network has been overhauled with the classification of existing wells, drilling of new shallow wells, and installation of new stream gages; new monitoring network visualized in Figure 4-4.
41	2.2.6 & 2.2.7	Basin Setting – ISW / GDE	**RCA 5c:** Prioritize collaborating and coordinating with local, state, and federal regulatory agencies as well as interested parties to better understand the full suite of beneficial uses and users that may be impacted by pumping induced surface water depletion within the GSA's jurisdictional area.	The GSA has collaborated with The Nature Conservancy on GDE mapping efforts and has coordinated with Northern Sacramento Valley Subbasins to develop a consistent approach to manage inter-connected surface waters. Coordination efforts are further summarized in Sections 2.2.6 and 2.2.7.
41	4.6	Monitoring Networks - ISW	**RCA 5d:** Clarify the groundwater level monitoring sites that will be used for the evaluation of depletions of interconnected surface water and provide site-specific information.	ISW monitoring network has been overhauled with the classification of existing wells, drilling of new shallow wells, and installation of new stream gages; new monitoring network visualized in Figure 4-4.

GSP Area

The Wyandotte Creek Subbasin is in Butte County within the Sacramento Valley, as shown in Figure ES-1. The Wyandotte Creek GSA jurisdictional area is defined by the boundaries of the Wyandotte Creek Subbasin in DWR's 2003 Bulletin 118 as updated in 2016 and 2018. Figure ES-2 shows the boundaries of the Wyandotte Creek Subbasin and the two MAs.

Outreach Efforts

A stakeholder engagement strategy was developed to solicit and discuss the interests of all beneficial users of groundwater in the Wyandotte Creek Subbasin and Plan Area. The strategy included monthly meetings of the Wyandotte Creek GSA Management Committees (made up of staff from the member agencies) and the Wyandotte Creek Advisory Committee (WAC), and a website where all announcements, meeting dates, times, and materials were posted.

The Wyandotte Creek GSA also prepared and implemented a Communication and Engagement Plan (C&E Plan) to encourage involvement from diverse social, cultural, and economic elements of the population of the Wyandotte Creek Subbasin, in addition to meeting SGMA requirements for intrabasin coordination.

In addition, various chapters of the GSP were available for preliminary review and comment prior to the final draft version released on December 15, 2021. Comments received on preliminary draft chapters were incorporated as deemed appropriate and helped guide and shape the final draft document.

The 2027 Amended GSP followed the same process as the 2022 GSP and was also available for review and comment by the public in 2026.

Basin Setting

The Wyandotte Creek Subbasin lies in the eastern central portion of the Sacramento Groundwater Basin. It is bounded on the west by the Feather River and Thermalito Afterbay; in the south by the Butte-Yuba County line (except for Ramirez Water District which is fully within the North Yuba Subbasin); and on the north and east by the edge of the alluvial basin as defined by DWR Bulletin 118 - Update 2003 (DWR, 2003). It is surrounded by the Butte Subbasin to the west, the Wyandotte Creek Subbasin to the north, the North Yuba Subbasin to the south and the foothills to the east (Figure ES-2). The lateral boundaries of the Wyandotte Creek Subbasin are jurisdictional in nature, and it is recognized that groundwater flows across each of the defined boundaries to some degree.

Continental sediments of the Tuscan and Laguna Formation compose the major fresh groundwater-bearing formations in the Wyandotte Creek Subbasin. The base of these continentally derived formations is generally accepted as the base of fresh water in the northern Sacramento Valley. Locally, the base of fresh groundwater fluctuates depending on local changes in the subsurface geology and geologic formational structure. The base of fresh water is known to be shallower along the eastern portion of the basin.

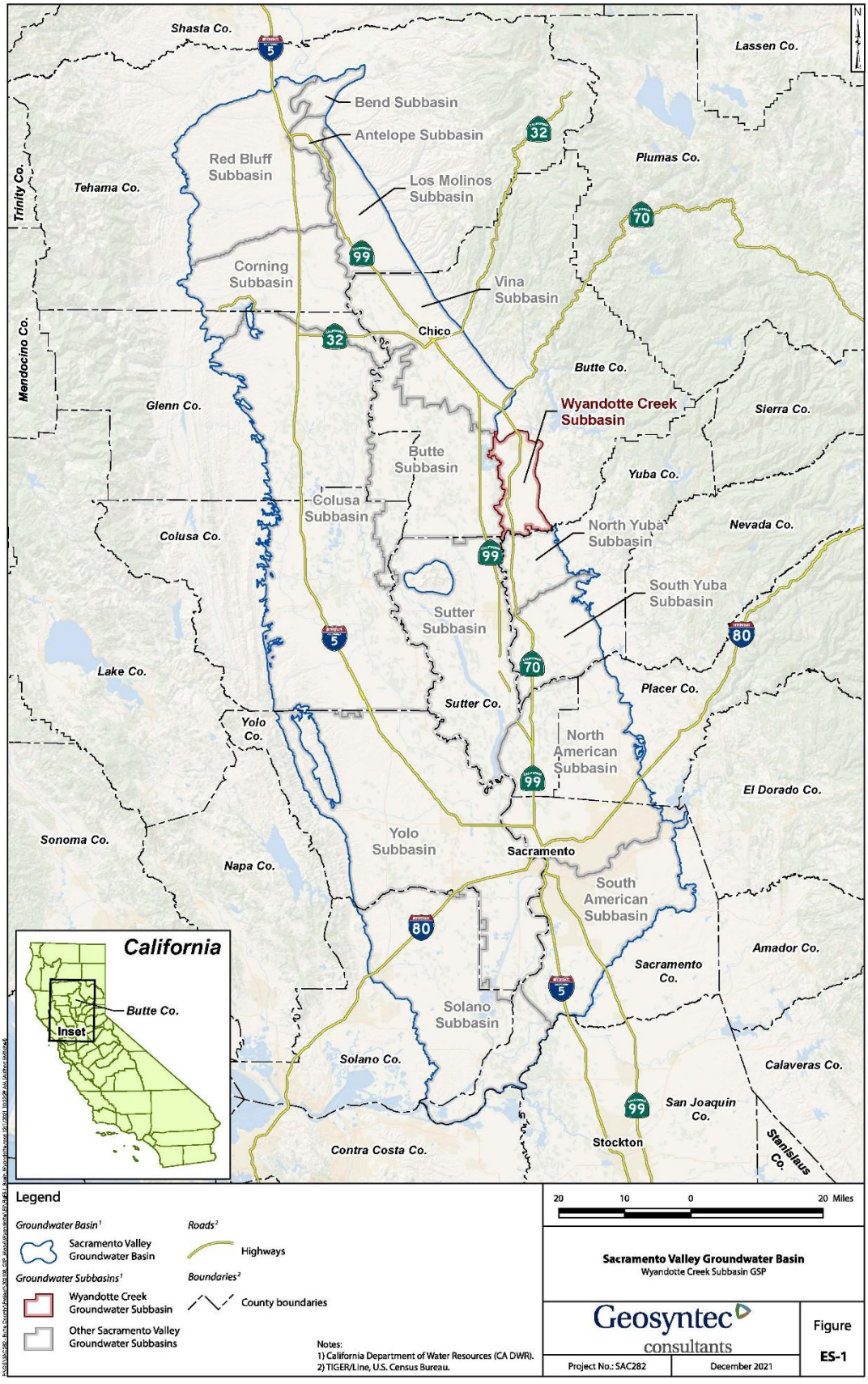


Figure ES-1: Sacramento Valley Groundwater Basin

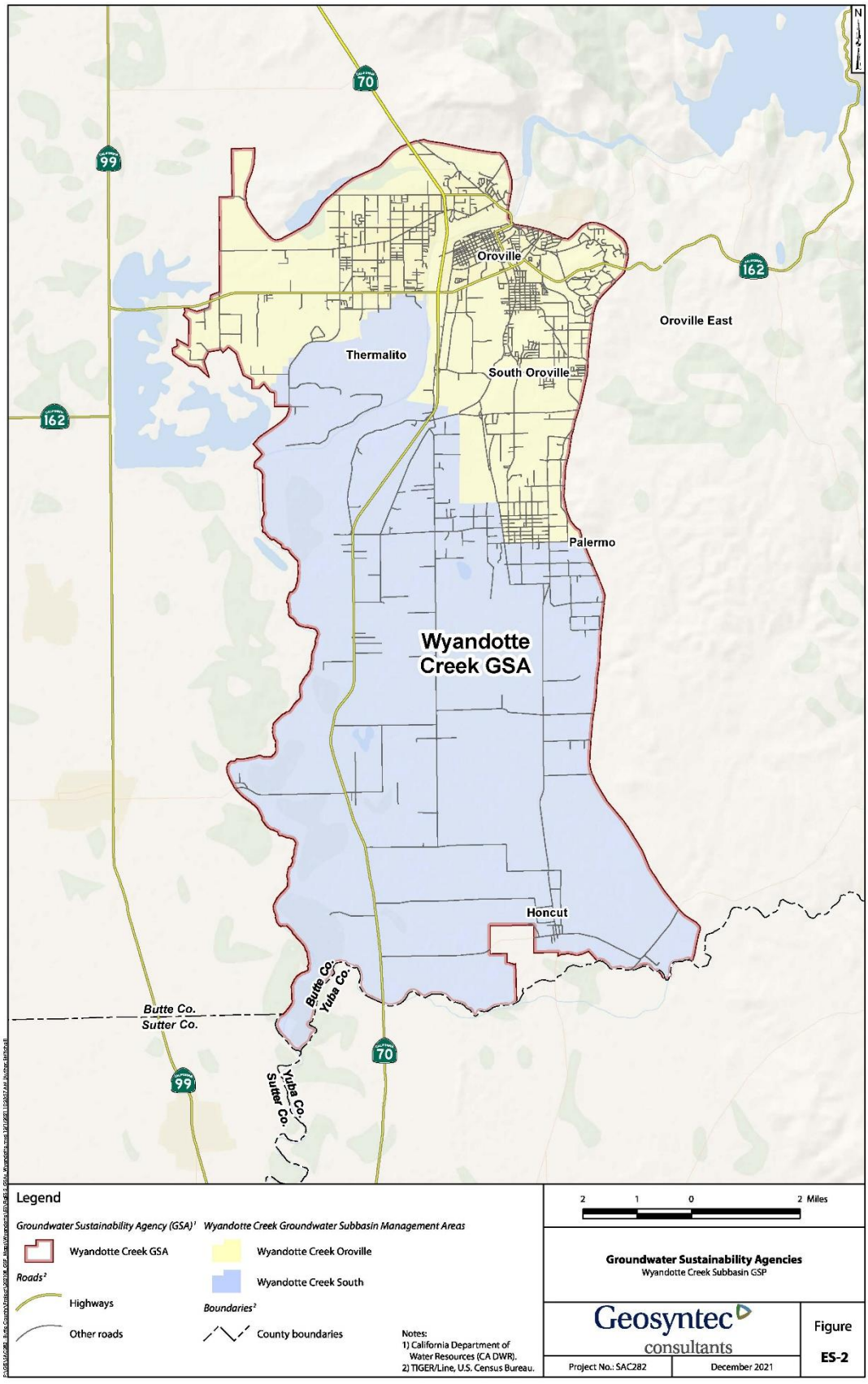


Figure ES-2: Groundwater Sustainability Agencies

Groundwater flows from the north and from foothill recharge areas in the east toward the subbasin's southeastern corner. Because of the influence of Thermalito Afterbay and the Feather River, groundwater elevations in the north are generally stable between the spring and fall observation periods, while elevations in the south tend to be lower in the fall than the spring, a pattern typical of valley floor locations distant from major sources of recharge. The location of the Wyandotte Creek Subbasin along with surface water features is shown in Figure ES-3.

Existing Groundwater Conditions

Groundwater conditions in the Wyandotte Creek Subbasin are regularly monitored and are described in reports produced by Butte County since 2001. The Wyandotte Creek GSA submits GSP annual reports to DWR, documenting the state of the groundwater basin. These documents and other reports portray a subbasin that has adequate groundwater resources to meet demands under most hydrologic conditions. However, comparison of the reports illustrates how in the period between their issuance, groundwater conditions have tightened, and as forces ranging from population growth to climate change play out, the value of well-informed water management policies and practices is likely to increase. In short, while groundwater conditions in the Wyandotte Creek Subbasin remain stable, maintaining this posture in the future may become less the result of a state of nature and more the reward for thoughtful management.

Based on historical data and the GSP annual reports, groundwater levels in the Wyandotte Creek Subbasin indicate that groundwater elevations are relatively stable. Groundwater quality in the basin is good except in areas where anthropogenic sources have impacted the groundwater. Figure ES-4 shows the locations of known impacted groundwater from these sources.

Groundwater storage in Wyandotte Creek Subbasin is relatively stable. The Feather River and Thermalito Afterbay stabilize storage volumes by providing recharge to the Wyandotte Creek Subbasin. The total fresh groundwater in storage was estimated at about 2.1 million-acre-feet (MAF) in 2018. The amount of groundwater in storage has decreased by approximately 0.14 percent per year between 2000 and 2018. Between 2020 to 2022, the Subbasin experienced a severe drought followed by several wet and above normal years. Groundwater storage decreased during the critically dry years and recovered during the wet and above normal years (2023-2025). As such, it is highly unlikely the Wyandotte Creek Subbasin will experience conditions under which the volume of stored groundwater poses a concern. However, the depth to access that groundwater across the Wyandotte Creek Subbasin may pose a concern.

Land subsidence has not historically been an area of concern in the Wyandotte Creek Subbasin and there are no records of land subsidence caused by groundwater pumping in the Wyandotte Creek Subbasin. Seawater intrusion is not applicable to the Wyandotte Creek Subbasin due to distance from the Delta and Pacific Ocean.

Surface waters can be hydraulically interconnected with the groundwater system, where the stream baseflow is either derived from the aquifer (gaining stream) or recharged to the aquifer (losing stream). If the water table beneath the stream lowers as a result of groundwater pumping, the stream may disconnect entirely from the underlying aquifer. Within the floodplain of the Feather River there is a continuous saturated zone that connects the shallowest aquifer to the river. The connectivity between shallow and deeper aquifer zones will dictate the overall connectivity to the river.

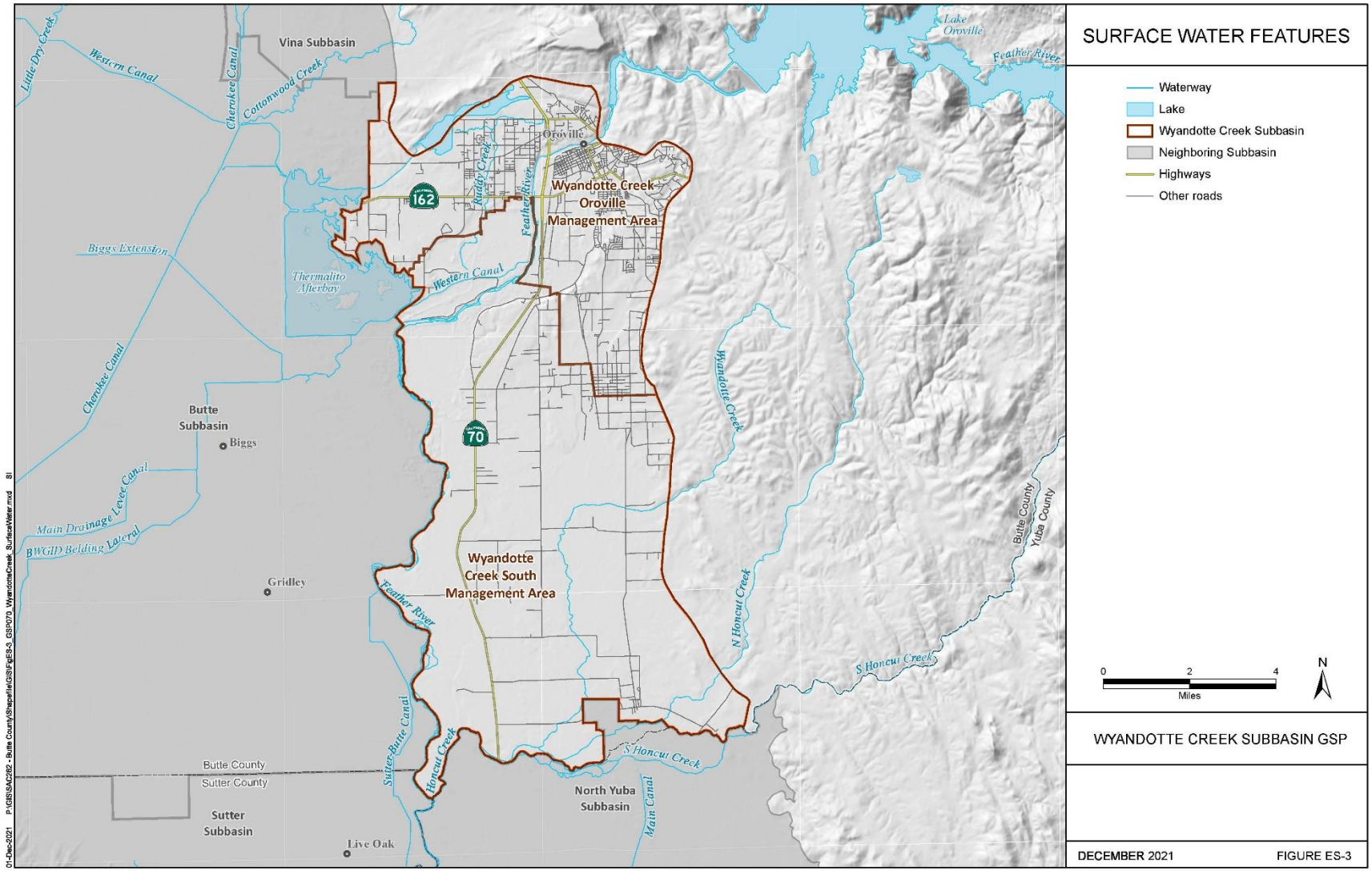


Figure ES-3: Surface Water Features in the Wyandotte Creek Subbasin

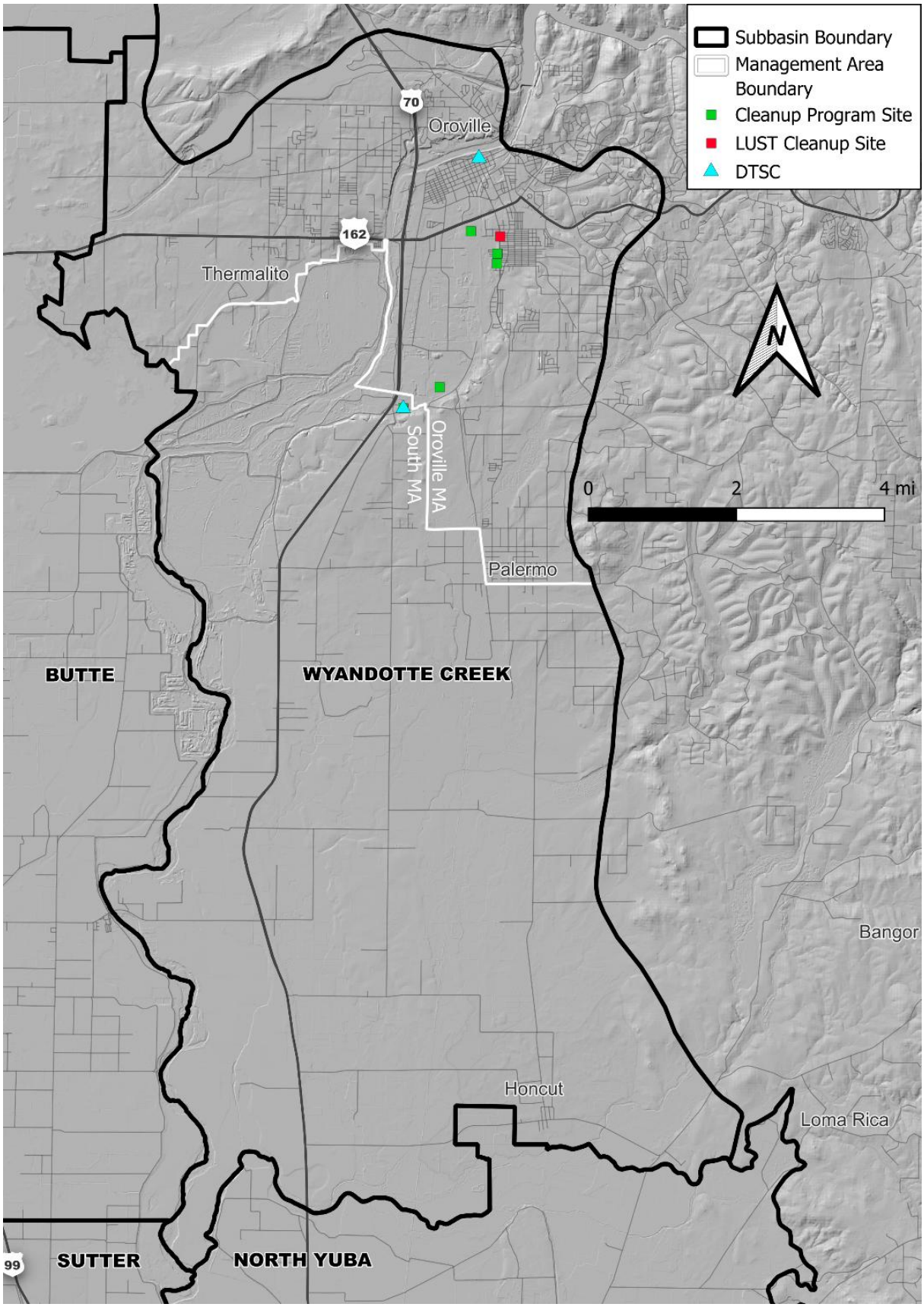


Figure ES-4: Active Contamination Remediation Sites

In the upland areas outside of the Feather River floodplain, there are creeks that flow seasonally and dry up in late summer or are dry for an entire year during dry conditions. In this case, the upland creeks may not be influenced by "high groundwater connectivity" and the presence of an undesirable result is not clear cut with respect to surface water depletion. The streams dry up regardless of the groundwater condition, and streams that are already dry are not considered interconnected surface water. However, the upland streams are an important source of recharge to the aquifer, so the health of these stream channels and their adjacent riparian zones is important to groundwater sustainability. This has been identified as a data gap and will be addressed as part of the GSP implementation.

Potential impacts of the depletion of interconnected surface water were discussed by stakeholders during technical discussions covering the fundamentals of groundwater-surface water interactions and mapping analysis of potential groundwater dependent ecosystems. Potential impacts identified by stakeholders were:

- Disruption to GDEs
- Reduced flows in rivers and streams supporting aquatic ecosystems and water right holders
- Streamflow changes in upper watershed areas outside of the Wyandotte Creek GSA boundary
- Water table depth dropping below the maximum rooting depth of Valley Oak (*Quercus lobata*) or other deep-rooted tree species
- Cumulative groundwater flow moving toward the Feather River from both the Wyandotte Creek Subbasin and surrounding GSAs on both the east and west side of the river

The Wyandotte Creek Subbasin acknowledges that overall function of the riparian zone and floodplain is dependent on multiple components of the hydrologic cycle that may or may not have relationships to groundwater levels in the principal aquifer. For example, hydrologic impacts outside of the Wyandotte Creek Subbasin, such as upper watershed development or fire-related changes in run-off, could result in impacts to streamflow, riparian areas, or GDEs that are completely independent of any connection to groundwater use or conditions within the Wyandotte Creek Subbasin.

Sustainable Management Criteria

SGMA introduces several terms to measure sustainability. The sustainability goal is the culmination of conditions resulting in a sustainable condition (absence of undesirable results) within 20 years. The sustainability goal for the Wyandotte Creek Subbasin is:

> *to ensure that groundwater is managed to provide a water supply of adequate quantity and quality to support beneficial users of groundwater including but not limited to rural areas and other communities, the agricultural economic base of the region, and environmental resource uses in the Subbasin now and in the future.*

SIs refer to any of the effects caused by groundwater conditions occurring throughout the Wyandotte Creek Subbasin that, when significant and unreasonable, cause undesirable results. The six SIs identified by DWR are:

1. Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the planning and implementation horizon
2. Significant and unreasonable reduction of groundwater storage
3. Significant and unreasonable seawater intrusion
4. Significant and unreasonable degraded water quality
5. Significant and unreasonable land subsidence that substantially interferes with surface land uses
6. Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water

Undesirable results are the significant and unreasonable occurrence of conditions that adversely affect groundwater use in the Wyandotte Creek Subbasin, including reduction in the long-term viability of domestic, agricultural, municipal, or environmental uses of the Wyandotte Creek Subbasin's groundwater. Categories of undesirable results are defined through the SIs.

MT are numeric values for each SI and are used to define when undesirable results occur. Undesirable results occur if MTs are exceeded in an established percentage of sites in the Wyandotte Creek Subbasin's representative monitoring network. MO are a specific set of quantifiable goals for the maintenance or improvement of groundwater conditions. The margin of operational flexibility is the range of active management between the MT and the MO. Interim milestones (IM) are targets set in 5-year increments over the implementation period of the GSP offering a path to sustainability. Figure ES-5 illustrates these terms using the groundwater level SI.

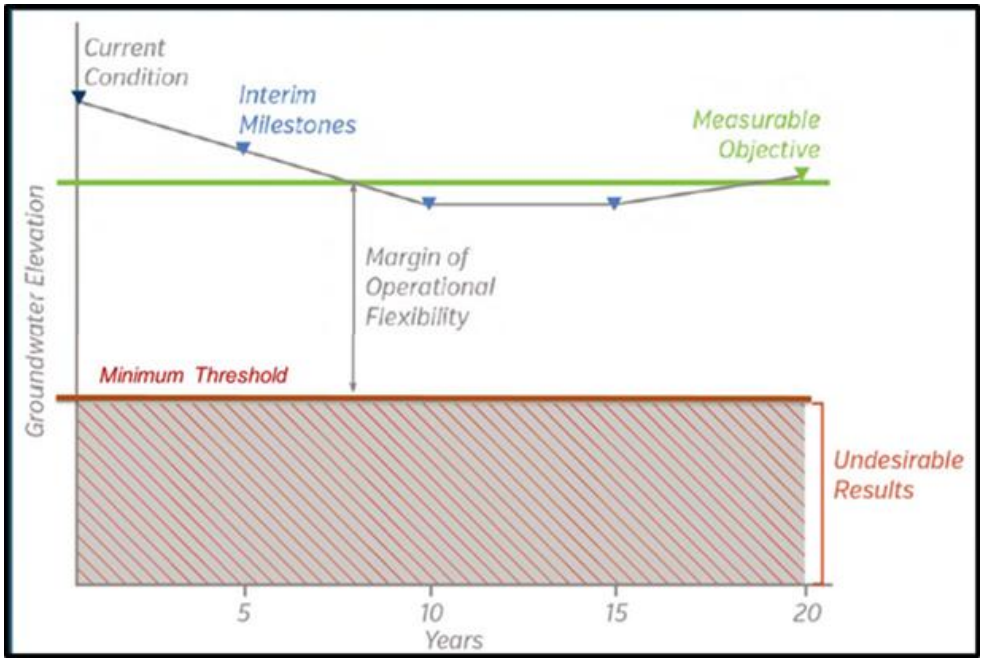


Figure ES-5: Illustration of Terms Used for Describing Sustainable Management Criteria Using the Groundwater Level Sustainability Indicator

A total of ten representative monitoring site (RMS) wells were identified for measurement of groundwater levels in the Wyandotte Creek Subbasin and six representative wells were identified for groundwater quality monitoring. The GSP uses groundwater quality data as a basis for evaluating conditions from saline water below the fresh water and uses groundwater level data as the basis for evaluating conditions for groundwater levels, groundwater storage, and subsidence. The GSP has identified a data gap for development of sustainable management criteria (SMC) for depletion of interconnected surface waters and has provided a framework for evaluation of this SI. For this GSP, the SMC developed for interconnected surface water is preliminary until data gaps are further addressed.

MTs and MOs were developed for each of the representative wells. Figure ES-6 shows a typical relationship of the MTs, MOs, and historical groundwater level data for a sample groundwater level representative monitoring well.

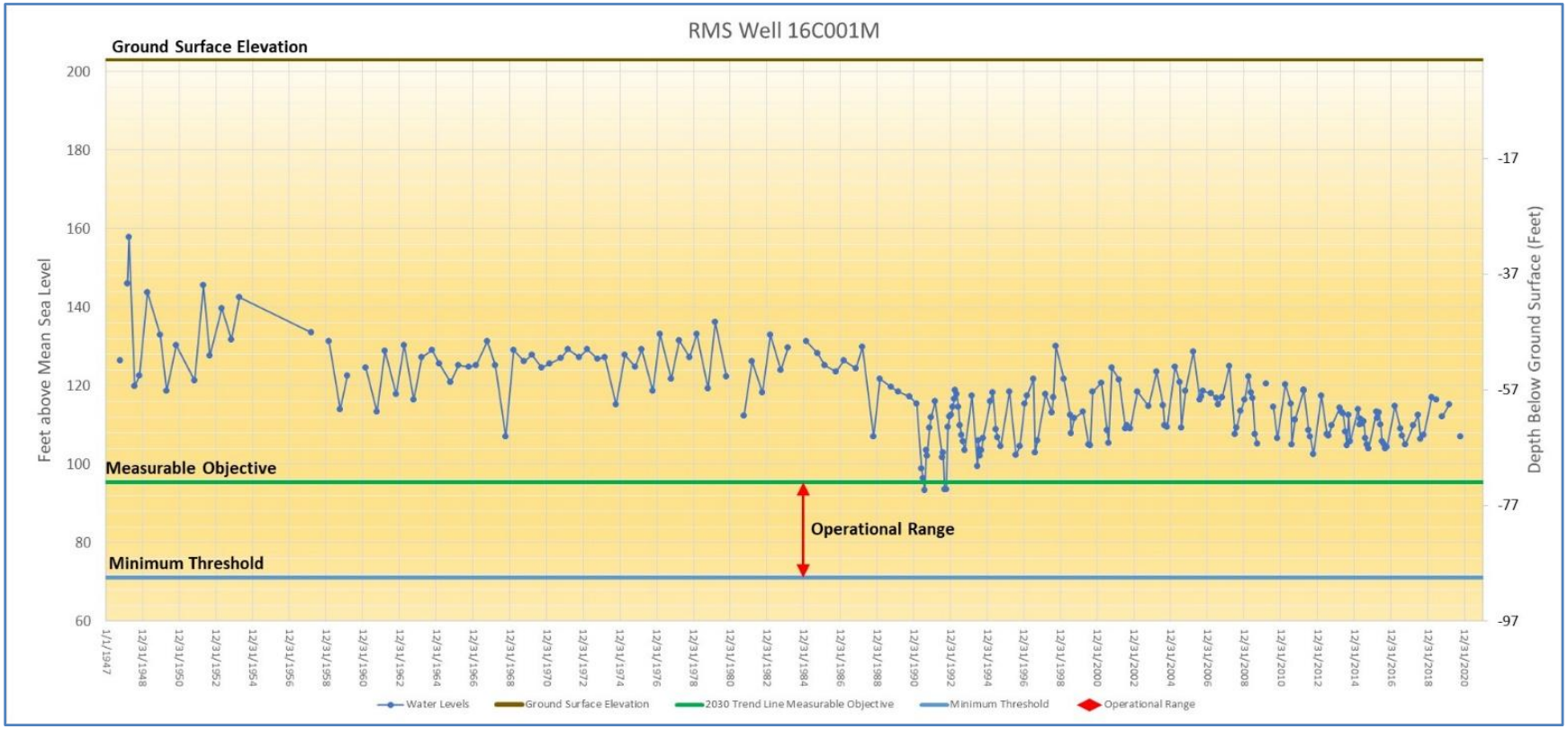


Figure ES-6: Representative Monitoring Site for Groundwater Levels with Relationship of Measurable Objectives, Minimum Thresholds, and Operational Range

MTs for groundwater levels were developed to protect shallow domestic wells within the Subbasin. Representative monitoring site (RMS) wells were selected to be representative of groundwater conditions for domestic wells. The MT for all RMS wells was set to the deeper value of two criteria:

- Criterion 1: Set to protect 95 percent of all shallow domestic wells within each RMS Zone, and
- Criterion 2: Set to a specified buffer distance below the historic low; the buffer is either the range of historically measured groundwater levels or 20 feet, whichever is shallower.

Criterion 2 ensures adequate operational flexibility in periods of drought. During the 2022-2027 implementation period, the domestic well inventory was enhanced and the new dataset was used to update the domestic well risk assessment and SMCs. At the updated MTs, approximately 38 of the 360 (or 11%) active domestic wells in the Subbasin are at risk of going dry. The GSA is working closely with Butte County's Drought Resilience Planning efforts to mitigate against wells going dry due to declining groundwater levels. Additionally, the GSA has identified a PMA, as discussed in Section 5.3.2, to mitigate against dry wells as needed.

The MO was set equal to the average groundwater level recorded from October 1st, 2015, through September 30th, 2025.

IM for groundwater levels are set at five-year intervals between 2022 and 2042. Since the MO for groundwater levels reflect current conditions and is set as a target for future conditions, all IM for groundwater levels are equal to the MO. Table ES-2 presents the groundwater level sustainable management criteria for RMS wells.

Table ES-2: Groundwater Levels Sustainable Management Criteria by Representative Monitoring Site in Feet Above Mean Sea Level

RMS Well ID	Domestic Well Count	Well Type	MT	MO	IM		
					2027	2032	2037
Wyandotte Creek Subbasin – Oroville Management Area							
16Q001M[3]	41	Shallow	108	139	139	139	139
32P001M[2]	64	Shallow	88.8	128	128	128	128
PWS-03[1, 2]	1	Shallow	94	131	131	131	131
Wyandotte Creek Subbasin – South Management Area							
13B002M[3]	14	Deep	11	58	58	58	58
22B001M[2]	32	Shallow	29.8	89	89	89	89
25N001M[3]	23	Shallow	25	61	61	61	61
19D003M[2]	59	Shallow	33.2	72	72	72	72
08M001M[2]	74	Deep	56.1	105	105	105	105
16C001M[3]	74	Both	70	106	106	106	106
31F001M[2]	48	Shallow	88.1	124	124	124	124

Notes:
[1] The MT for RMS PWSPWS-03 will be set using criterion 2 due to only having one domestic well in the RMS zone.
[2] RMS well uses criterion 2 for setting the MT.
[3] RMS well uses criterion 1 for setting the MT.

MTs and MOs for water quality were defined by considering two primary beneficial uses at risk of undesirable results related to salinity: drinking water and agriculture uses. There are several water quality standards for irrigated agriculture, which all recognize that total salt is an important criterion to determine the suitability of water for irrigation. Salinity can affect plant water availability and yield. Typical ranges for irrigation water for EC are 0 to 3,000 µS/cm. The California Department of Health Services has established the preferred agricultural water quality level of specific conductance less than 700 µS/cm. Therefore, the MO is set to 700 µs/cm to maintain irrigated agriculture sensitivity level for salinity to protect agricultural usage.[3] This is consistent with the Butte County Basin Management Objectives (BMO) defined in the Butte County Code of Ordinances. The Butte County BMO Program expired upon the adoption of the 2022 GSP. The MT is set to the recommended secondary maximum contaminant level of 900 µs/cm, or the measured historical high, to ensure safe drinking water (State Water Resources Control Board, 2017).

Data needed to develop the SMC for interconnected surface waters includes definition of stream reaches and associated priority habitat, streamflow measurements to develop profiles at multiple time periods, measurements of groundwater levels directly adjacent to stream channels, first water bearing aquifer zone, and deeper aquifer zones, and estimates of volumes, location and timing of surface water depletion. These data are only partially available and are still a data gap for the GSP. Between 2022 and 2027, new groundwater wells and stream gages have been

[3] Artiola, Janick F., Ian L. Pepper, Mark Brusseau. Environmental Monitoring and Characterization. Table 9.4, pg 148

installed to address the data gap. Further evaluation of this SMC is needed to avoid undesirable results to aquatic ecosystems and GDEs as applicable. To that end, an Interconnected Surface Water SMC framework has been developed for the GSP. Preliminary SMCs have been drafted for the current 2027 Amended GSP, with the goal of collecting additional data for five more years to fill remaining data gaps. RMS wells were selected using existing wells considered representative of ISW connected to the upper (or shallow) aquifer system. Preliminary ISW SMCs were set to a specified buffer distance below the historic low; the buffer is either the range of historically measured groundwater levels or 20 feet, whichever is shallower. Finalized SMCs are scheduled to be developed for the 2032 periodic evaluation, or as guidance is issued, to account for the rate of stream depletion.

The MTs and MOs for groundwater levels are also used for groundwater storage SIs. The groundwater levels MTs are found to be protective of groundwater storage.

The MT and MOs for subsidence are based on historical subsidence trends calculated from InSAR satellite-based subsidence monitoring data. The subsidence analysis in Section 2.2.5.2 showed that the Subbasin experienced minimal subsidence historically (elastic), with a maximum value of 0.1111 feet of subsidence over five years. The MT is set to double the historical trend at 0.5 feet of subsidence over five years (or 2 feet over 20 years), and is meant to represent inelastic, or irreversible, subsidence solely due to lowering groundwater levels and may lead to undesirable results. The subsidence MO is equal to the observed maximum subsidence from InSAR data. The MO is one foot over 20 years (e.g., 0.25 feet over a 5-year period) for each of the selected InSAR pixels.

Water Budgets

The groundwater evaluations conducted as a part of GSP development have provided estimates of the historical, current, and projected groundwater budget conditions. The current analysis was prepared using the best available information and through use of the Butte Basin Groundwater Model (BBGM). The BBGM began in 1992 and has been updated over time to simulate historical conditions through 2024. To prepare water budges for the 2022 GSP, historical BBGM results for water years 2000 to 2018 have been relied upon and four additional baseline scenarios were developed to represent current and projected conditions utilizing 50 years of hydrology. It is anticipated that as additional information becomes available, the model will be updated, and more refined estimates of annual pumping and overdraft can be developed.

The projected Wyandotte Creek Subbasin water budget was also evaluated under climate change conditions, which simulate higher demand requiring increased groundwater pumping despite more precipitation and streamflows. The climate change scenario used for the analysis was based on the 2030 and 2070 central tendency climate change datasets provided by DWR to support GSP development. The overdraft modeled under climate change conditions is simulated to increase above projected conditions without climate change up to 3,700 AFY. Figure ES-8 illustrates the cumulative change in groundwater storage for current and future conditions. The model will be updated and calibrated periodically to assess long-term future conditions.

The GSA will annually evaluate and report changes in groundwater storage (i.e., assess overdraft) based on groundwater level measurements collected in the field. The ten-year (WY 2016 – 2025) average annual change in groundwater storage is +4,600 AF per year.. This suggests the Subbasin is currently sustainable and will remain sustainable in the short term. Long-term projections of up to 3,700 AF of overdraft using the model are reasonable based on

our current understanding and guidance from DWR. The GSA will develop PMAs to implement as necessary to maintain sustainability.

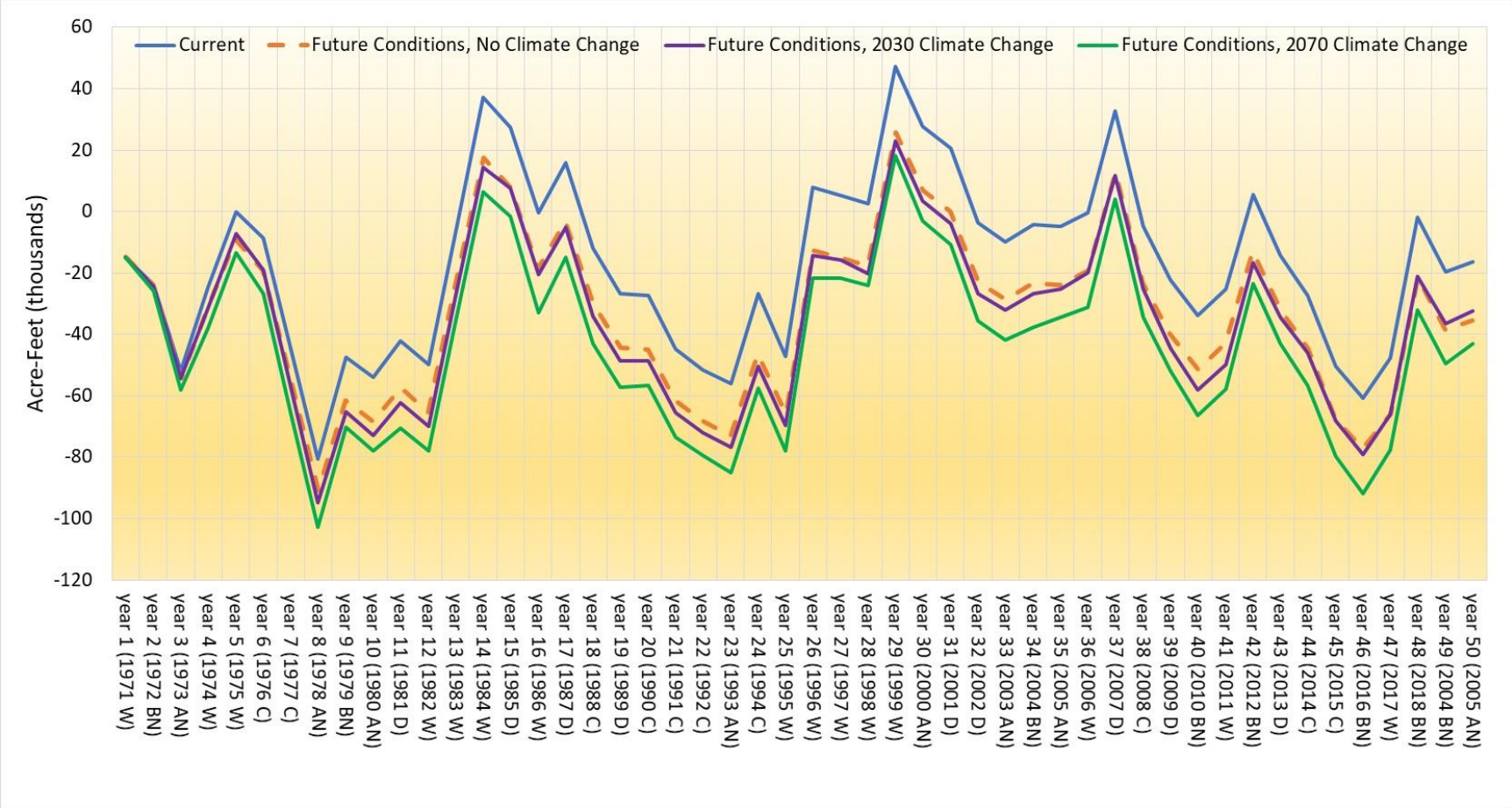


Figure ES-7: Cumulative Change in Groundwater Storage for Current and Future Conditions Baseline Scenarios (BBGM v. 1.0)

Monitoring Networks

The GSP outlines the monitoring networks for the six SIs. The objective of these monitoring networks is to monitor conditions across the Wyandotte Creek Subbasin and to detect trends toward undesirable results. Specifically, the monitoring network was developed to do the following:

- Monitor impacts to the beneficial uses or users of groundwater
- Monitor changes in groundwater conditions relative to MOs and MTs
- Demonstrate progress toward achieving MOs described in the GSP

There are four representative monitoring networks in the Wyandotte Creek Subbasin including a representative network for groundwater levels, water quality, land subsidence, and interconnected surface water. Representative networks are used to determine compliance with the MTs. These sites are selected from broader networks administered by DWR, Butte County, and other outside agencies. These broad networks collect data for informational purposes to identify trends and fill data gaps across the entire Subbasin / State. Sites from the broader network will be re-evaluated, as needed, to assess whether or not to include as a RMS.

The monitoring networks were designed by evaluating data from Butte County's former Basin Management Objective (BMO) program, the United States Geological Survey (USGS), and participating GSAs. The monitoring network consists largely of wells that are already being used for monitoring in the Wyandotte Creek Subbasin. Figure ES-9 shows the location of groundwater monitoring wells for the representative monitoring networks.

Wells in the monitoring networks will be measured at least on a semi-annual schedule. Historical measurements will be entered into the Wyandotte Creek Subbasin Data Management System (DMS), and future data will also be stored in the DMS. A summary of the wells in the monitoring networks is shown in Table ES-3 below. There are also twelve stream gages monitored within the Wyandotte Creek Subbasin.

Table ES-3: Summary of Monitoring Network Wells

Representative Networks	Well Count
Groundwater Level	10
Groundwater Quality	4
Interconnected Surface Waters	3

Data Management System

The DMS that will be used is a geographical relational database that will include information on water levels, land elevation measurements, and water quality testing. The DMS will allow the GSA to share data and store the necessary information for annual reporting.

The DMS will be on local servers and data will be transmitted annually to form a single repository for data analysis for the Wyandotte Creek Subbasin's groundwater, as well as to allow for preparation of annual reports. The DMS currently includes the necessary elements required by the regulations, including:

- Well location and construction information for the representative monitoring points (where available)
- Water level readings and hydrographs including water year type
- Land based measurements
- Water quality testing results
- Estimate of groundwater storage change, including map and tables of estimation
- Graphs with Water Year type, Groundwater Use, Annual Cumulative Storage Change

Additional items may be added to the DMS in the future as required. Data will be entered into the DMS by the GSA.

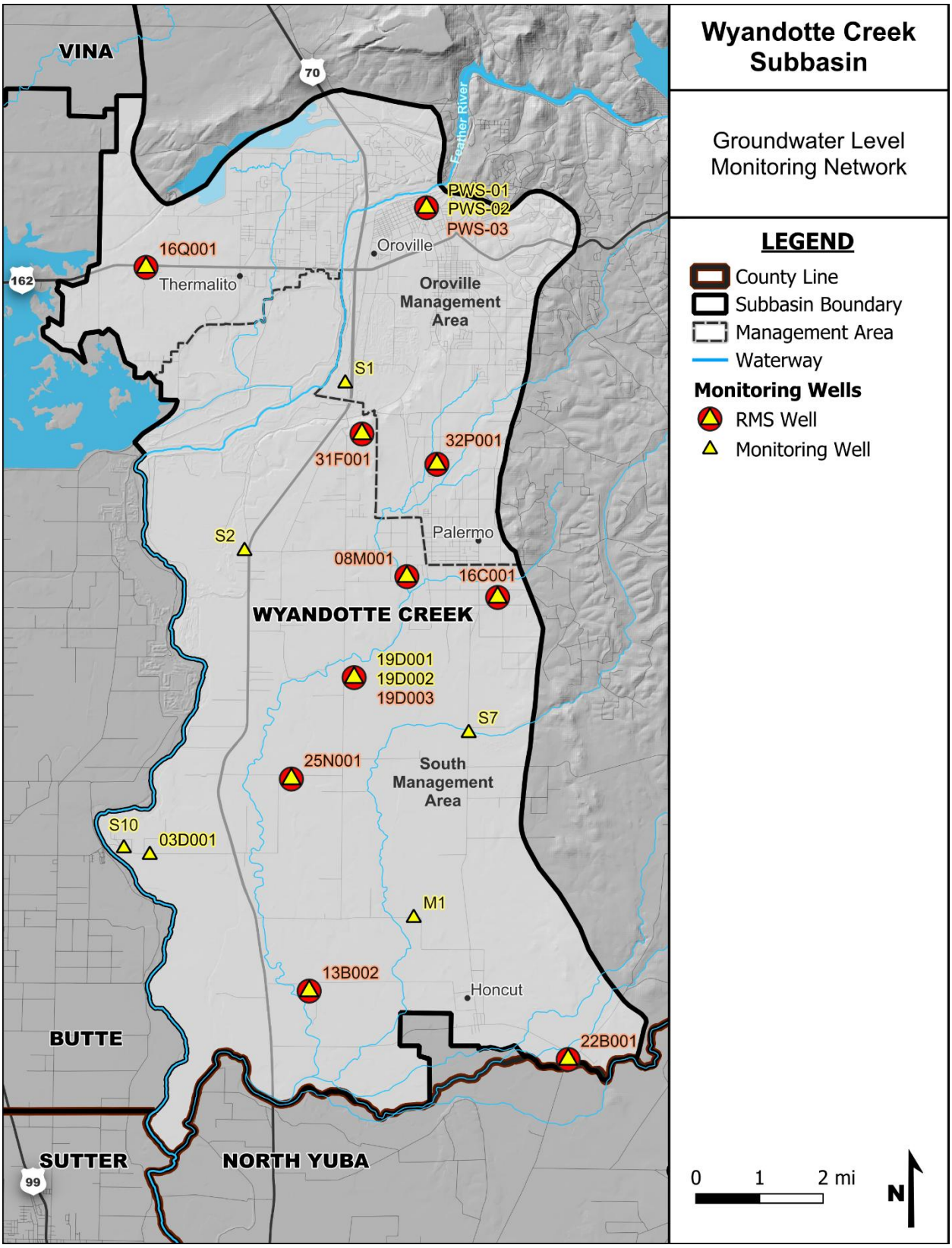


Figure ES-8: Groundwater Level Monitoring Network

Projects and Management Actions

Each of the projects are in various stages of development ranging from ongoing to planned to those still in the conceptual phase. Thus, each of the projects have a different level of development. The GSA will maintain a list of proposed projects and track their development status. The GSA will use this list to help secure funding as opportunities become available. Projects presented in this Plan will remain a part of the potential projects that the GSA may choose to implement, however as other projects are identified, those will be added to the list. The projects currently being considered are sorted into the following categories: Completed, In-Progress, Potential, and Other Projects as described in GSP Sections 5.2.4, 5.2.5, 5.2.6, and 5.2.7; respectively.

Completed:

- TWSD Water Treatment Plant Capacity Upgrade

In-Progress Projects:

- Residential Water Conservation
- Palermo Clean Water Consolidation Project
- Regional Conjunctive Use Project

Potential Projects:

- Extend Orchard Replacement

These Projects have been prioritized by the GSA for implementation. Other projects are listed in Section 5.2.7 that may be prioritized and implemented by the GSA as needed.

Management Actions

GSAs have a variety of tools to use to achieve sustainable groundwater management. Projects focus primarily on capture, use, and recharge of surface water supplies while management actions focus on groundwater demand.

Section 5.3 presents several management actions that the GSA may consider during GSP implementation. It is expected that the GSA will further develop and modify management actions in response to stakeholder input and available information. The management actions identified in this GSP include:

- General Plans Updates
- Domestic Well Mitigation
- Well Permitting Ordinance
- Landscape Ordinance
- Expansion of Water Purveyors' Service Area

The GSA has prioritized domestic well mitigation to implement as needed. Other management actions may be prioritized and implemented as needed.

Plan Implementation

The Wyandotte Creek Subbasin GSP is being implemented by the GSAGSA since its submission in 2022. In 2023, the GSA successfully passed a Proposition 218 process to assess landowners based on three user classes: non-irrigated, irrigated with surface water, and irrigated with groundwater. These fees fund administrative, legal, and SGMA-compliance costs. The GSA will consider alternative funding structures based on feedback from constituent members as needed.

The GSAGSA applied and received grant funding to further support the GSP implementation through new data collection and projects and management actions. The Regional Conjunctive Use Project, consisting of Intra-Basin Water Transfer and Agricultural Surface Water Supplies planning and feasibility studies, and Thermalito Water Treatment Plant Capacity Upgrade were completed. The GSA will continue their public outreach efforts and work to secure funding to implement projects and management actions. The estimated budgets and implementation schedule for the proposed projects and management actions are presented in Chapter 6.

Implementing the Wyandotte Creek Subbasin GSP will require numerous management activities that will be undertaken by the GSA, including:

- Monitoring conditions relative to applicable SIs at specified frequency and timing
- Entering updated monitoring data into the Wyandotte Creek Subbasin DMS
- Refining the Wyandotte Creek Subbasin model and water budget planning estimates
- Preparing annual reports summarizing the conditions of the Wyandotte Creek Subbasin and progress towards sustainability and submitting them to DWR
- Completing Periodic Evaluations of the GSP every five years and submitting them to DWR
- Overseeing and monitoring projects, management actions, and collection of data identified as “data gaps” within the GSP
- Identify funding sources
- Coordinating with neighboring subbasins

1. AGENCY INFORMATION, PLAN AREA, COMMUNICATION

1.1 Introduction and Agency Information

1.1.1 Purpose of the Groundwater Sustainability Plan

The purpose of this Groundwater Sustainability Plan (GSP) is to meet the regulatory requirements set forth in the three-bill legislative package consisting of Assembly Bill (AB) 1739 (Dickinson), Senate Bill (SB) 1168 (Pavley), and SB 1319 (Pavley), collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA defines sustainable groundwater management as "management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results," which are defined by SGMA as any of the following effects caused by groundwater conditions occurring throughout the basin (Department of Water Resources [DWR], 2018a):

- Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the planning and implementation horizon
- Significant and unreasonable reduction of groundwater storage
- Significant and unreasonable seawater intrusion
- Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies
- Significant and unreasonable land subsidence that substantially interferes with surface land uses
- Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water

The Wyandotte Creek Groundwater Subbasin (Wyandotte Creek Subbasin) has been identified by DWR as a medium priority basin. The Wyandotte Creek GSP was developed to meet SGMA regulatory requirements by the January 31, 2022, deadline for high and medium priority basins while reflecting local needs and preserving local control over water resources. Requirements for the GSP are provided in California Code of Regulations Title 23, Division 2, Chapter 1.5, Subchapter 2, Article 5. Appendix 1-A provides a checklist of where to find the information required by these regulations.

The Wyandotte Creek GSP provides a path to achieve and document sustainable groundwater management within 20 years following GSP adoption, promoting the long-term sustainability of locally managed groundwater resources now and into the future. In 2027, an Amended GSP and Periodic Evaluation was submitted to DWR. The Amended GSP updated SMCs and networks for nearly all applicable sustainability indicators. Stream depletions and subsidence, that previously used the groundwater level SI as a proxy, have their own established networks and SMCs. The 2027 GSP also updated key sections with new data and analysis, including interconnected surface water and groundwater dependent ecosystems. The sustainable yield has been updated to reflect updated data collection for groundwater pumping and groundwater levels. Water budget results including estimates of groundwater pumping and change in storage, and sustainable yield will be updated in annual reporting.

While the Wyandotte Creek GSP offers a new and significant approach to groundwater resource protection, it was developed within an existing framework of comprehensive planning efforts. Throughout the Wyandotte Creek Subbasin, several separate yet related planning efforts have occurred previously or are concurrently proceeding. In November 1996, the voters in Butte County approved "An Ordinance to Protect the Groundwater Resources in Butte County." One of the stated purposes of the ordinance was that "the groundwater underlying Butte County is a significant water resource which must be reasonably and beneficially used and conserved for the benefit of the overlying land by avoiding extractions which harm the Butte basin aquifers (includes the Wyandotte Creek Subbasin), causing exceedance of the safe yield or a condition of overdraft." Other significant reports prepared in the Wyandotte Creek Subbasin include integrated regional water management (IRWM), urban water management, habitat conservation, basin assessment, and general planning. The Wyandotte Creek GSP fits in with these prior planning efforts, building on existing local management and basin characterization. A description of prior planning efforts can be found in Section 1.2.1 of this document.

1.1.2 Sustainability Goal

A sustainability goal is the culmination of conditions resulting in a sustainable condition (absence of undesirable results) within 20 years. The sustainability goal reflects this requirement and succinctly states the GSP's objectives and desired conditions of the Wyandotte Creek Subbasin.

The sustainability goal for the Wyandotte Creek Subbasin is "to ensure that groundwater is managed to provide a water supply of adequate quantity and quality to support beneficial users of groundwater including but not limited to rural areas and other communities, the agricultural economic base of the region, and environmental resource uses in the Subbasin now and in the future."

Additional discussion of the sustainability goal can be found in Section 3: Sustainable Management Criteria.

1.1.3 Contact Information

The Wyandotte Creek Groundwater Sustainability Agency (GSA) has been tasked with submitting a single, jointly composed GSP to DWR on behalf of the entire Wyandotte Creek Subbasin. Contact information for the submitting agency and Plan Manager is provided below:

Submitting Agency:	Wyandotte Creek Groundwater Sustainability Agency 308 Nelson Avenue Oroville, California 95965 (530) 552-3591
Plan Manager:	GSA Program Manager 308 Nelson Avenue Oroville, California 95965 530.552.3595 WyandotteGSA@gmail.com

The Plan Manager is subject to change. Updated contact will be available on the GSA's website: https://www.wyandottecreekgsa.com/.

1.1.4 Agency Information

The Wyandotte Creek GSA was formed through the execution of a Joint Powers Agreement (Agreement; Appendix 1-B) by the County of Butte, City of Oroville and Thermalito Water and Sewer District (TWSD; Figure 1-1).

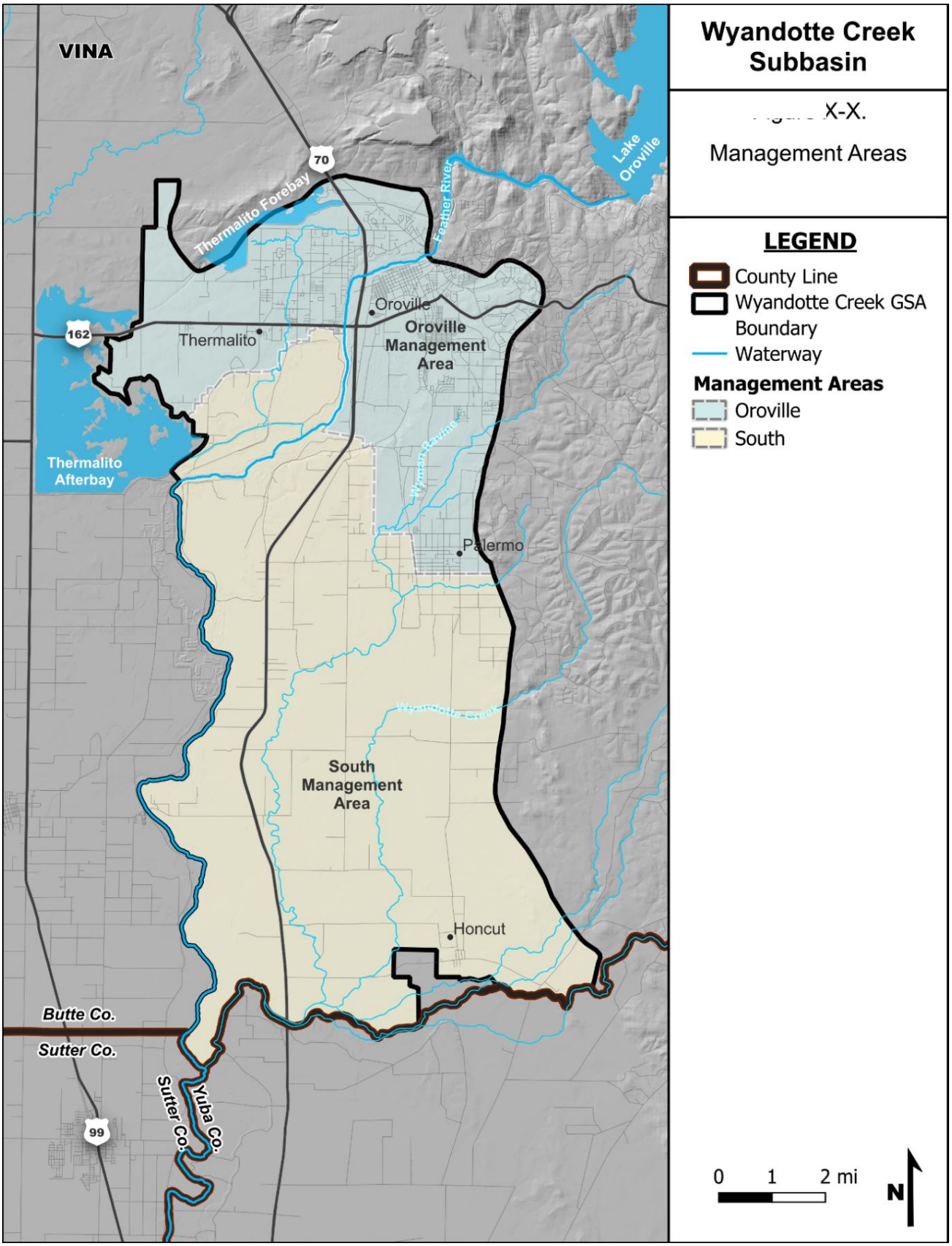


Figure 1-1: Groundwater Sustainability Agency with Management Areas.

The Wyandotte Creek GSA filed to be a GSA on October 24, 2018. The purpose of the Agreement was to create the Wyandotte Creek GSA to 1) to develop, adopt, and implement a GSP for the Wyandotte Creek Subbasin to implement SGMA requirements and achieve the sustainability goals; and 2) involve the public and subbasin stakeholders through outreach and engagement in developing and implementing the GSP. At the heart of the Agreement is the focus to maximize local input and decision-making and address the different water demands and sustainability considerations in the municipal and rural areas of the Wyandotte Creek subbasin.

The Wyandotte Creek GSA Board serves as the policy-making role for SGMA implementation in the Wyandotte Creek subbasin. All GSA Board meetings are subject to the Brown Act and are noticed and open to the public. The GSA Board is composed of five seats, each with equal and full voting rights, including:

1. Butte County – one seat (Member Agency)
2. City of Oroville – one seat (Member Agency)
3. TWSD – one seat (Member Agency)
4. Agricultural groundwater user – one seat (At-large Butte County Appointed Stakeholder)
5. Domestic well user (non-agricultural) – one seat (At large Butte County Board Appointed Stakeholder)

The Wyandotte Creek GSA Board as stated in the Agreement possesses the ability to exercise those powers specifically granted by the Joint Powers Act and SGMA. Additionally, the GSA has the ability to exercise the common powers of its members related to the purposes of the GSA, including, but not limited to, the following:

- To designate itself as the exclusive GSA for the Wyandotte Creek Subbasin pursuant to SGMA.
- To develop, adopt and implement a GSP for the Wyandotte Creek Subbasin pursuant to SGMA.
- To adopt rules, regulations, policies, bylaws, and procedures governing the operation of the GSA and adoption and implementation of a GSP for the Wyandotte Creek Subbasin.
- To adopt ordinances within the Wyandotte Creek Subbasin consistent with the purpose of the GSA as necessary to implement the GSP and otherwise meeting the requirements of the SGMA.
- To obtain legal, financial, accounting, technical, engineering, and other services needed to carry out the purposes of this Agreement.
- To perform periodic reviews of the GSP including submittal of annual reports.
- To require the registration and monitoring of wells within the Wyandotte Creek Subbasin.
- To issue revenue bonds or other appropriate public or private debt and incur debts, liabilities, or obligations.

- To exercise the powers permitted under Government Code section 6504 or any successor statute.
- To levy taxes, assessments, charges, and fees as provided in SGMA or otherwise provided by law.
- To regulate and monitor groundwater extractions within the Wyandotte Creek Subbasin as permitted by SGMA, provided that this Agreement does not extend to a Member's operation of its systems to distribute water once extracted or otherwise obtained, unless and to the extent required by other laws now in existence or as may otherwise be adopted.
- To establish and administer projects and programs for the benefit of the Wyandotte Creek Subbasin.
- To cooperate, act in conjunction and contract with the United States, the State of California, or any agency thereof, counties, municipalities, special districts, GSAs, public and private corporations of any kind (including without limitation, Public Utilities Commission regulated utilities and mutual water companies), and individuals, or any of them, for any and all purposes necessary or convenient for the full exercise of powers of the GSA.
- To accumulate operating and reserve funds and invest the same as allowed by law for the purposes of the GSA and to invest funds pursuant to California Government Code section 6509.5 or other applicable State Law.
- To apply for and accept grants, contributions, donations, and loans under any federal, state, or local programs for assistance in development or implementing any of its projects or programs for the purposes of the GSA.
- To acquire by negotiation, lease, purchase, construct, hold, manage, maintain, operate, and dispose of any buildings, property, water rights, works or improvements within and without the respective boundaries of the Members necessary to accomplish the purposes described herein.
- To sue and be sued in the GSA's own name.
- To exercise the common powers of its members to develop, collect, provide, and disseminate information that furthers the purposes of the GSA, including but not limited to the operation of the GSA and adoption and implementation of a GSP for the Wyandotte Creek Subbasin, to the Members' legislative, administrative, and judicial bodies, as well as the public generally.
- To perform all other acts necessary or proper to carry out fully the purposes of this Agreement.

The Wyandotte Creek GSA Board aspires to seek consensus. If the Wyandotte Creek GSA Board cannot reach consensus, the Wyandotte Creek GSA Board defaults to the following voting structure.

- Quorum: A majority of the members of the Wyandotte Creek GSA Board members shall constitute a quorum for purposes of transacting business.

- Director Votes: Each member of the Wyandotte Creek GSA Board shall have one vote.
- Supermajority Voting Requirement (four affirmative votes) for the following:
    1. Bylaws adoption, modification or alteration
    2. GSP adoption, modification, alteration
    3. Adoption of assessment, charges and fees
    4. Adoption of regulations and ordinances
    5. Adoption or modification of annual budget, including capital projects
    6. Property acquisition (excepting rights of way)
    7. Removal of Advisory Committee Members
    8. Modifications to the composition and number of Advisory Committee Members
    9. Removal of stakeholder board seats as is consistent with the Agreement

The Wyandotte Creek GSA Board does not have the authority to limit or interfere with the respective Member Agency's rights and authorities over their own internal matters, including, but not limited to, legal rights to surface water supplies and assets, groundwater supplies and assets, facilities, operations, water management and water supply matters. The Member Agencies made no commitments by entering into the Agreement to share or otherwise contribute their water supply assets as part of the development or implementation of a GSP. Nothing in the Agreement modifies or limits a Member Agency's police powers, land use authorities, or any other authority. The Member Agencies cooperate to obtain consulting, administrative and management services needed to efficiently develop a GSP and to identify mechanisms for the management and funding commitments reasonably anticipated to be necessary for the purposes of this Agreement.

Each Member Agency (Butte County, City of Oroville and TWSD) designates a staff person (in-kind support) to participate on the Wyandotte Creek GSA Management Committee. The Management Committee receives direction from the Wyandotte Creek GSA Board, makes recommendations and generates staff reports and proposals to the Wyandotte Creek GSA Board. The Management Committee staffs the Advisory Committee and reports to the Wyandotte Creek GSA Board. The Management Committee assures that staff and other resources are provided to prepare the GSP and administer the governance for the Wyandotte Creek GSA.

The Wyandotte Creek GSA does not and will not have any employees. However, the Wyandotte Creek GSA has the power to employ consultants to fulfill the objectives and purposes of SGMA and complete a GSP. Butte County provides technical and staff support in coordination with the Management Committee and the Wyandotte Creek GSA Board. The Management Committee may form ad hoc technical working groups to provide input on technical matters pertaining to the GSP. Preparation of the Wyandotte Creek GSP and carrying out governance requires various administrative activities such as meeting management, website development and maintenance, public outreach and communication.

The Wyandotte Creek Advisory Committee (WAC) provides input and recommendations to Wyandotte Creek GSA Board on GSP development and implementation as well as other items

outlined in their Charter. At the time of GSP submittal, the Advisory Committee members included:

- California Water Service (Cal Water) – One representative
- Tribal representative(s))
- South Feather Water and Power Agency (SFWPA) – One representative
- At-large agricultural groundwater users – Three representatives
- At-large domestic well users – Two representatives
- At-large environmental – One representative
- At-large business – One representative

The Wyandotte Creek GSA Board appointed at-large members to fill Advisory Committee seats. Interested individuals from the community or organizations may apply to the Wyandotte Creek GSA. At-large members must live, farm or be employed by a firm operating in the Wyandotte Creek subbasin. To inform the Wyandotte Creek GSA Board and assist in decision-making, the Advisory Committee provides recommendations that are included in Management Committee reports. The recommendations identify areas of agreement and disagreement. The Advisory Committee strives for consensus when possible, but reaching consensus is not necessary. Consensus means that everyone can at least "live with" the recommendation. When unable to reach consensus on recommendations, the Advisory Committee outlines the areas in which it does not agree, providing some explanation to inform the Wyandotte Creek GSA Board decision-making. The Wyandotte Creek GSA Board considers Advisory Committee recommendations when making decisions. If that Board does not agree with the recommendations of the Advisory Committee, the Wyandotte Creek GSA Board states the reasons for its decision. The Advisory Committee is staffed by one member of each of the Member Agencies. All Advisory Committee meetings are subject to the Brown Act and are noticed and open to the public.

Updates to the Board and Committee members will be posted to the GSA's website.

1.2 Groundwater Sustainability Plan Area

This section provides a detailed description of the Wyandotte Creek Subbasin, including major streams and creeks, institutional entities, agricultural and urban land uses, locations of groundwater wells, and locations of state lands. The GSP Area document also describes existing surface water and groundwater monitoring programs, existing water management programs, and general plans in the GSP Area.

1.2.1 Summary of Jurisdictional Areas and Other Features

The Wyandotte Creek Subbasin falls within the larger Sacramento Valley Groundwater Basin (Figure 1-2). Basin designations by DWR were first published in 1952 in Water Quality Investigations Report No. 3, Ground Water Basins in California, and subsequently updated in Bulletin 118 in 1975, 1980, 2003 and draft update in 2020. As shown in Figure 1-3, the Wyandotte Creek Subbasin (Bulletin 118 Basin Number 5-021.69) is bordered to the north by the Vina Subbasin (Bulletin 118 Basin Number 5-021.57), the Butte Subbasin (Bulletin 118 Basin Number 5-021.70) to the west; to the south by the North Yuba Subbasin (Bulletin 118

Basin Number 5-021.60) and Sutter Subbasin (Bulletin 118 Basin Number 5-021.62; and to the east by the Sierra Nevada geomorphic province.

The Wyandotte Creek Subbasin is located within Butte County. Geologic units in the Wyandotte Creek Subbasin consist of consolidated rocks and unconsolidated deposits as discussed in detail in Section 2. No adjudicated areas or areas covered by an alternative to a GSP exist within the Wyandotte Creek Subbasin.

Figure 1-4 shows the Wyandotte Creek Subbasin's key geographic features. The Wyandotte Creek Subbasin encompasses an area of about 59,382 acres. There are two entities within the Wyandotte Creek Subbasin with land use jurisdiction: Butte County and the City of Oroville.

Figure 1-5 shows the tribal areas within the Wyandotte Creek Subbasin that includes portions of the Berry Creek Off-Reservation Trust Land, Mooretown Off-Reservation Trust Land, and Mooretown Rancheria. Figure 1-6 shows the spatial extent of Disadvantaged Communities (DACs) and Severely Disadvantaged Communities (SDACs) in the Wyandotte Creek Subbasin. DWR defines DACs as census geographies (census tracts, census block groups, and census-designated places) with an annual median household income (MHI) that is less than 80% of the statewide annual MHI. SDACs are defined as census geographies with an MHI less than 60% of the statewide annual MHI. DWR uses the most recently available 5-year American Community Survey (ACS) dataset to identify these areas. For this GSP, the 2012-2016 ACS dataset was used, establishing statewide MHI as $63,783 (CA DWR, Mapping Tools).

Figure 1-7 shows a map of land use in the Wyandotte Creek Subbasin across four general categories: cropland, industrial, undeveloped, and urban. These categories were mapped based on categories provided by 2015 land use from the United States Department of Agriculture's (USDA) CropScape 2015 dataset.

Land use patterns in the Wyandotte Creek Subbasin are dominated by agricultural uses, including nut and fruit trees, vineyards, row crops, grazing, and forage. Throughout the Wyandotte Creek Subbasin both agricultural and urban land use rely on a combination of surface water and groundwater. Land use is primarily controlled by local agencies. Land use patterns in the low foothills to the east are dominated by native vegetation and unirrigated pasture lands (USDA, 2020).

Crop type varies by region, with fruit and nut trees and rice fields comprising the majority of agriculture in the Wyandotte Creek Subbasin (Figure 1-8). Figure 1-9 shows a map with boundaries of federal and state public lands within the region that includes the Wyandotte Creek Subbasin.

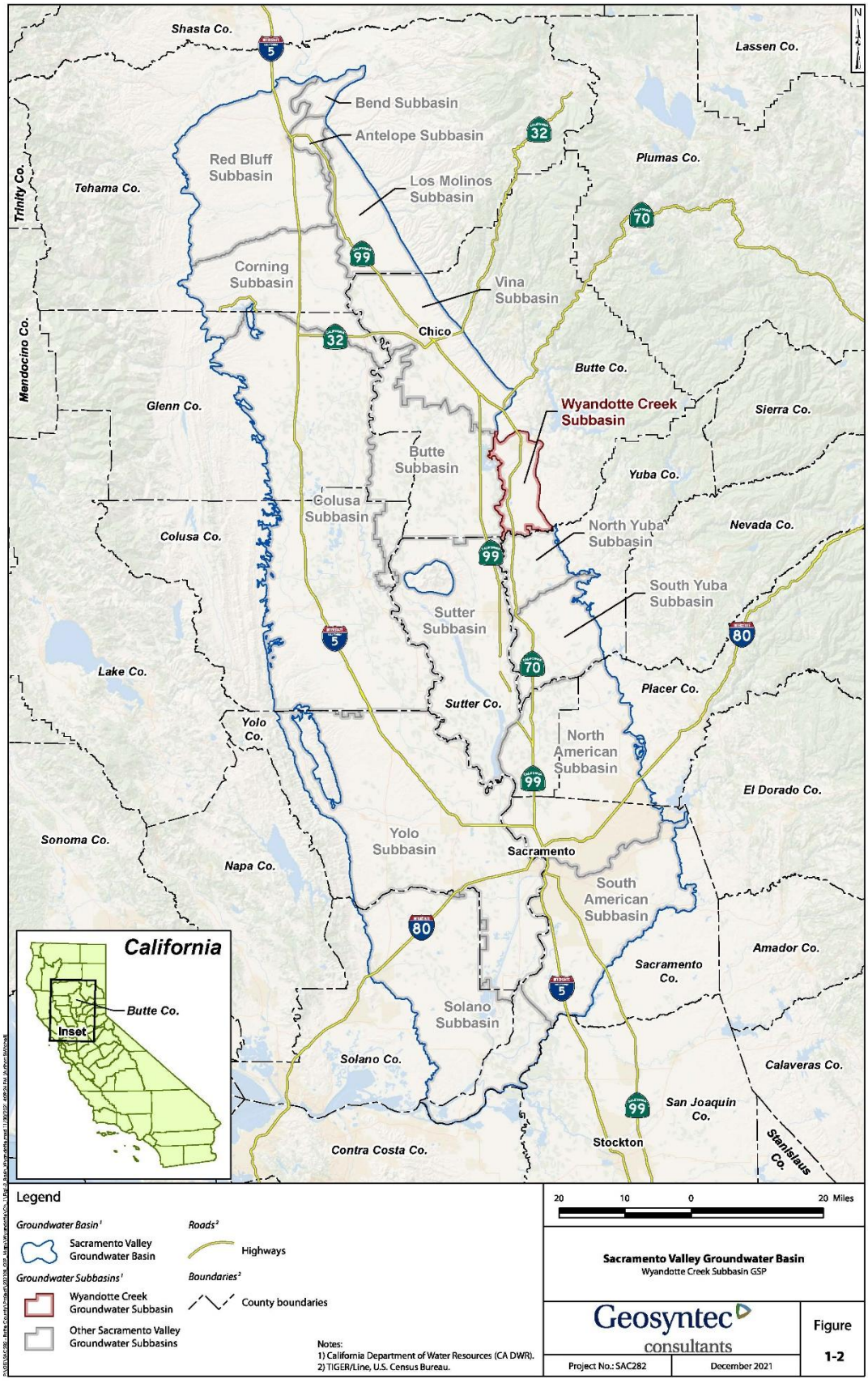


Figure 1-2: Sacramento Valley Groundwater Basin

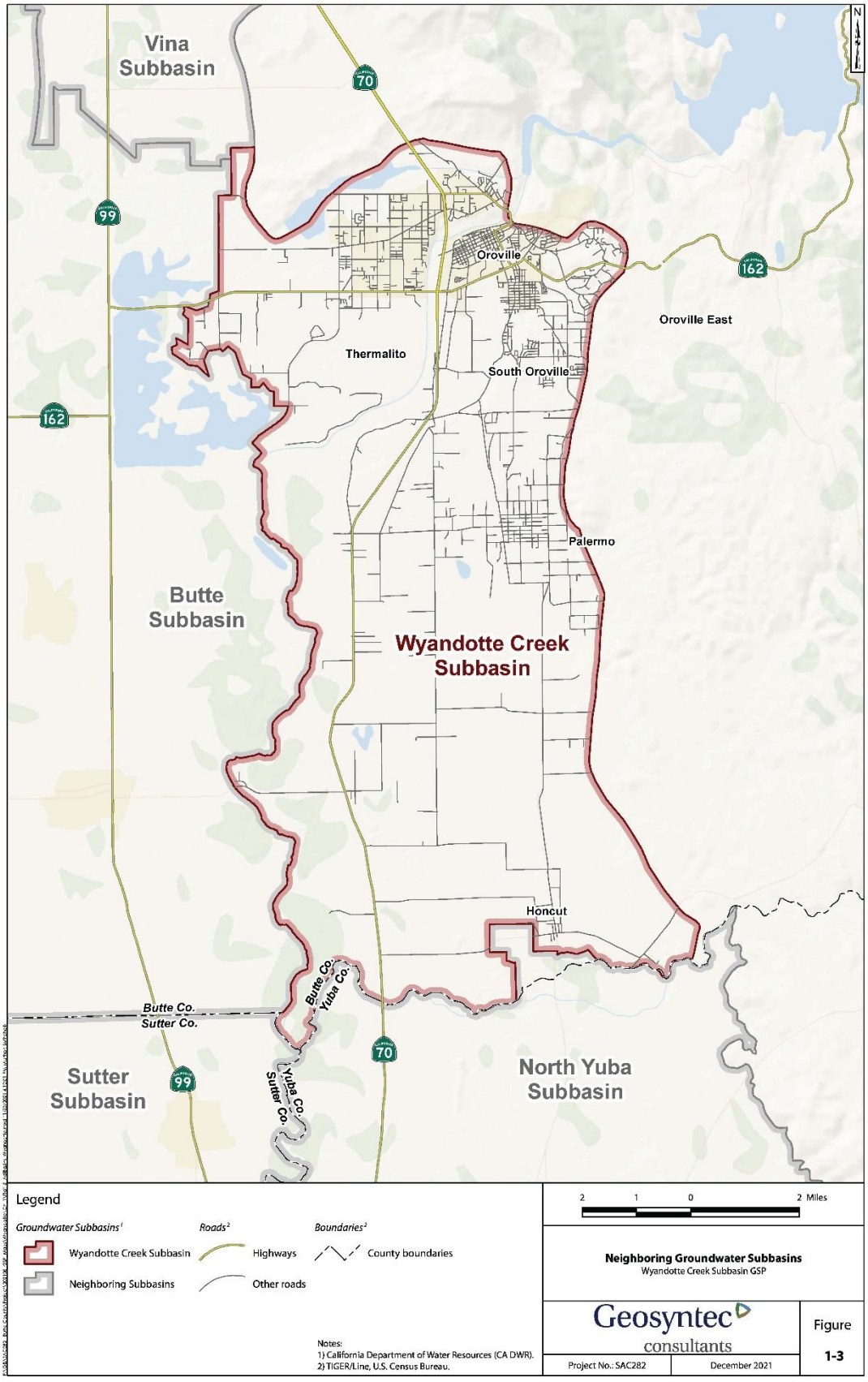


Figure 1-3: Neighboring Groundwater Subbasins

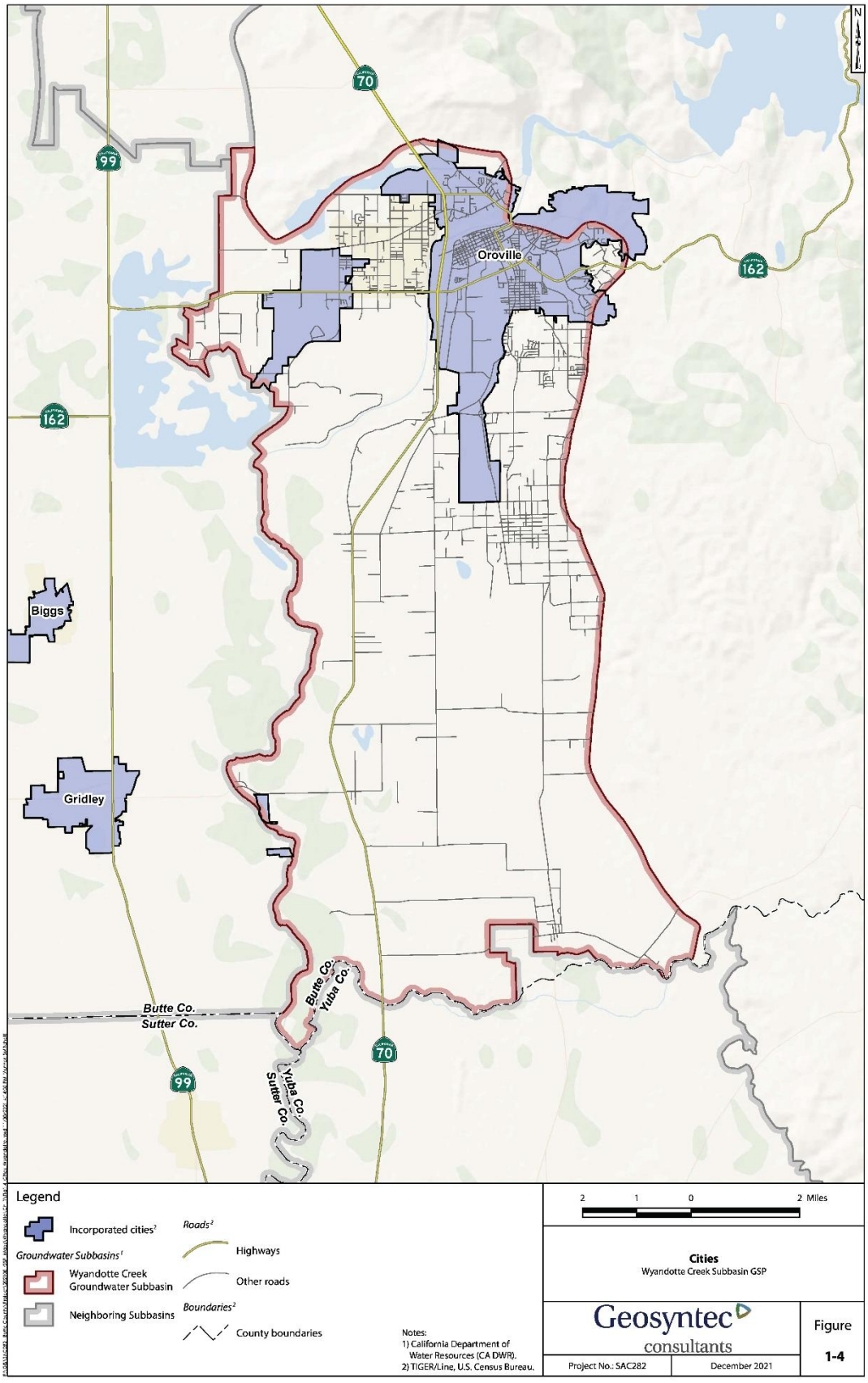


Figure 1-4: Cities

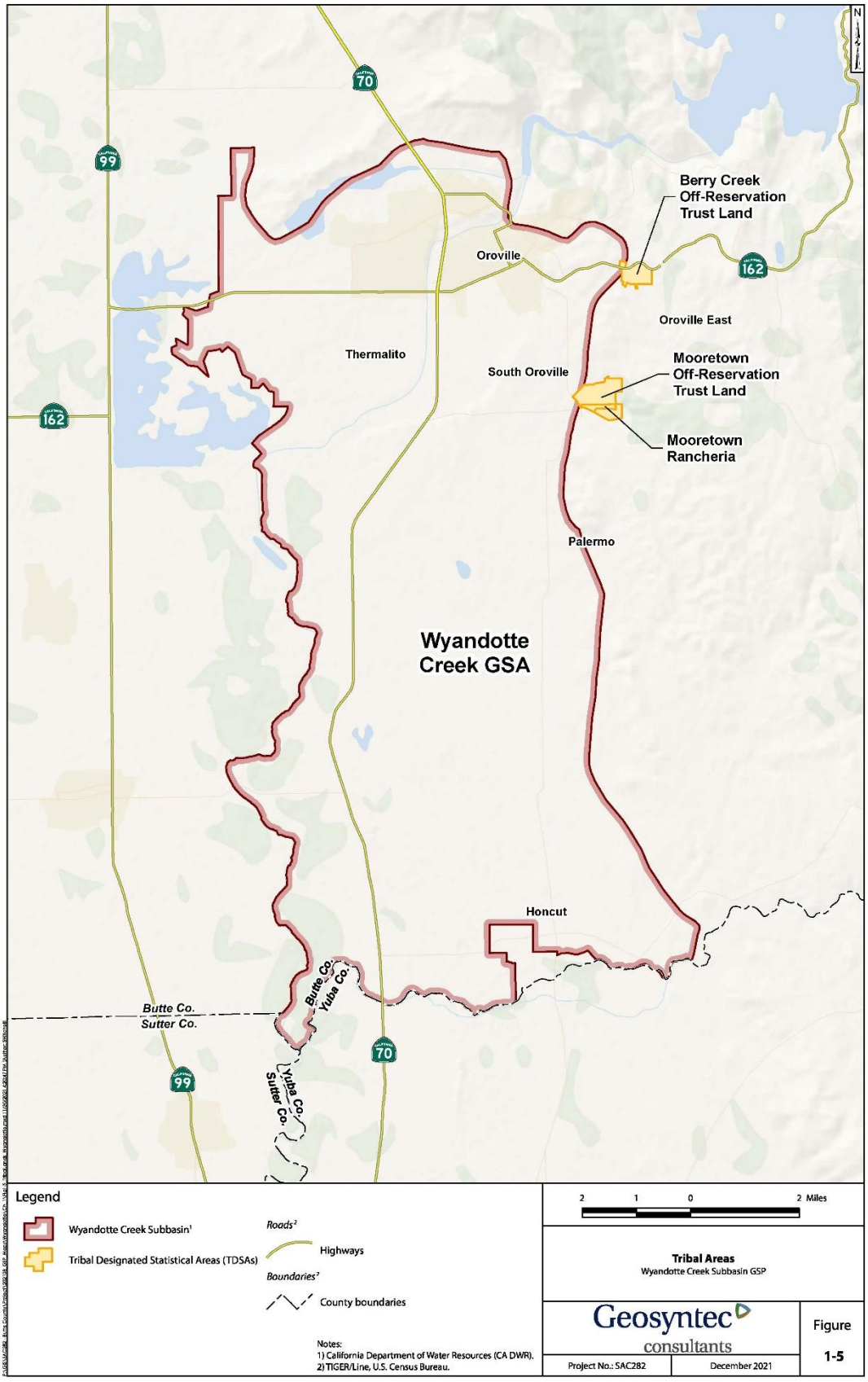


Figure 1-5: Tribal Areas

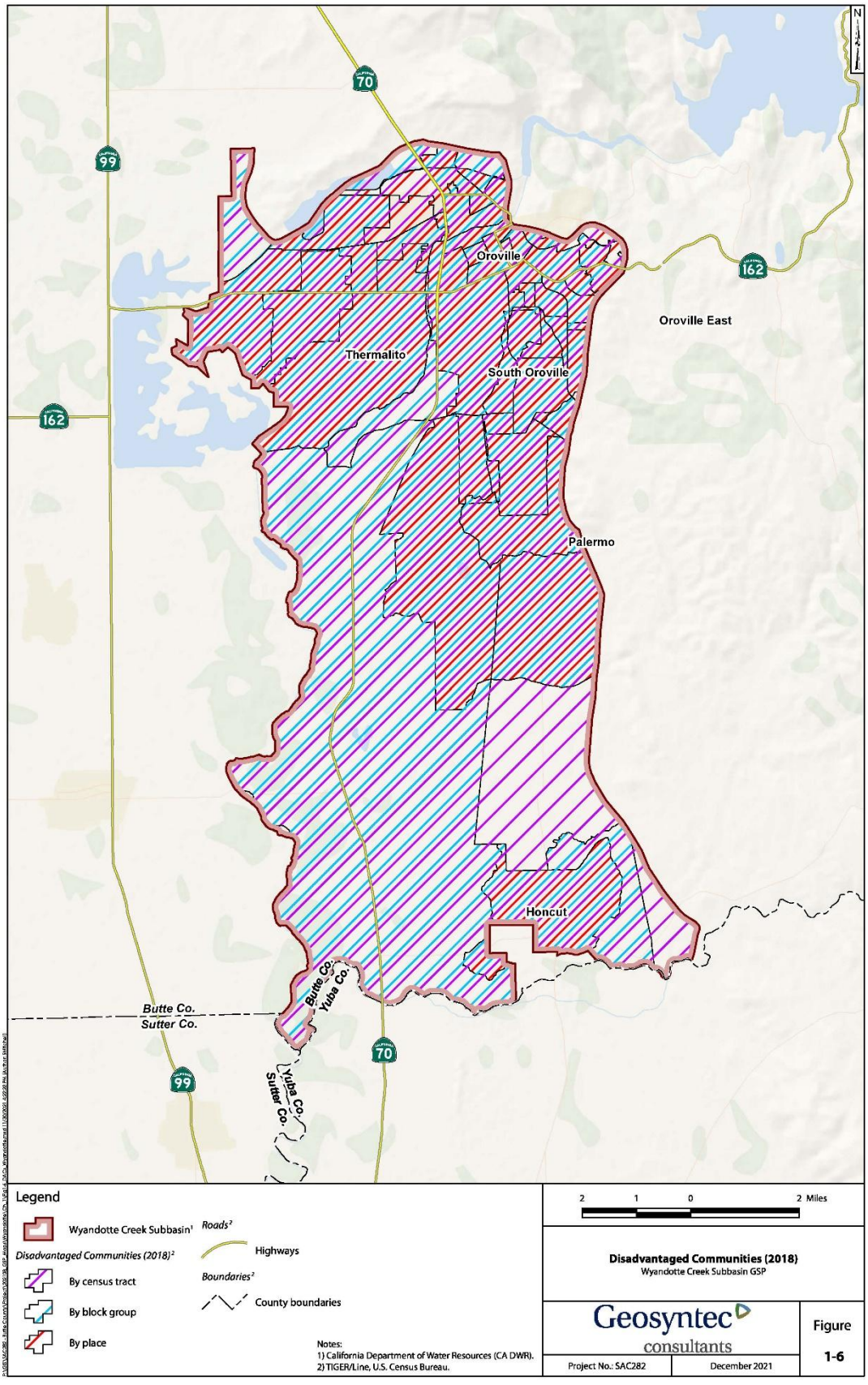


Figure 1-6: Disadvantaged Communities (2018)

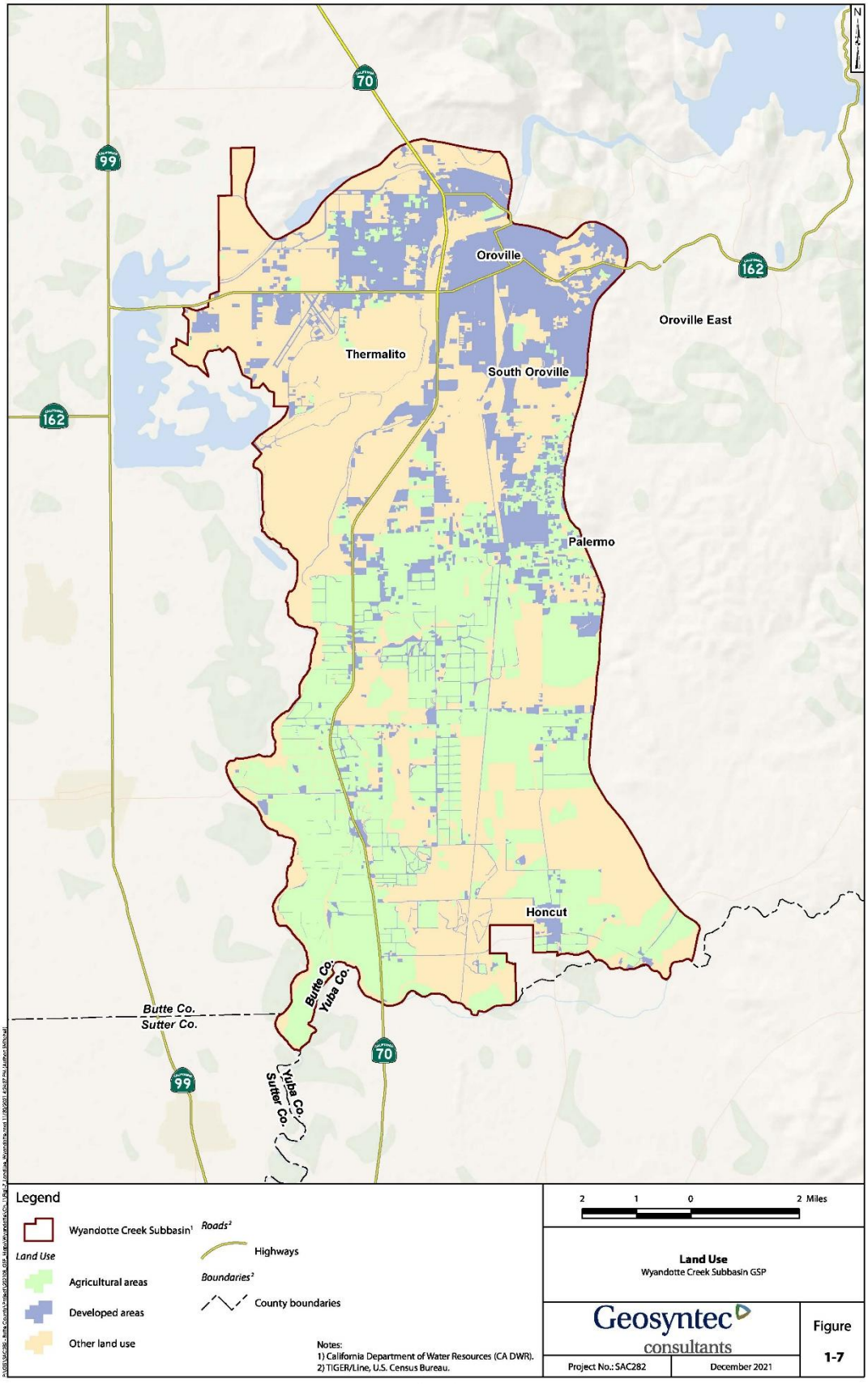


Figure 1-7: Land Use

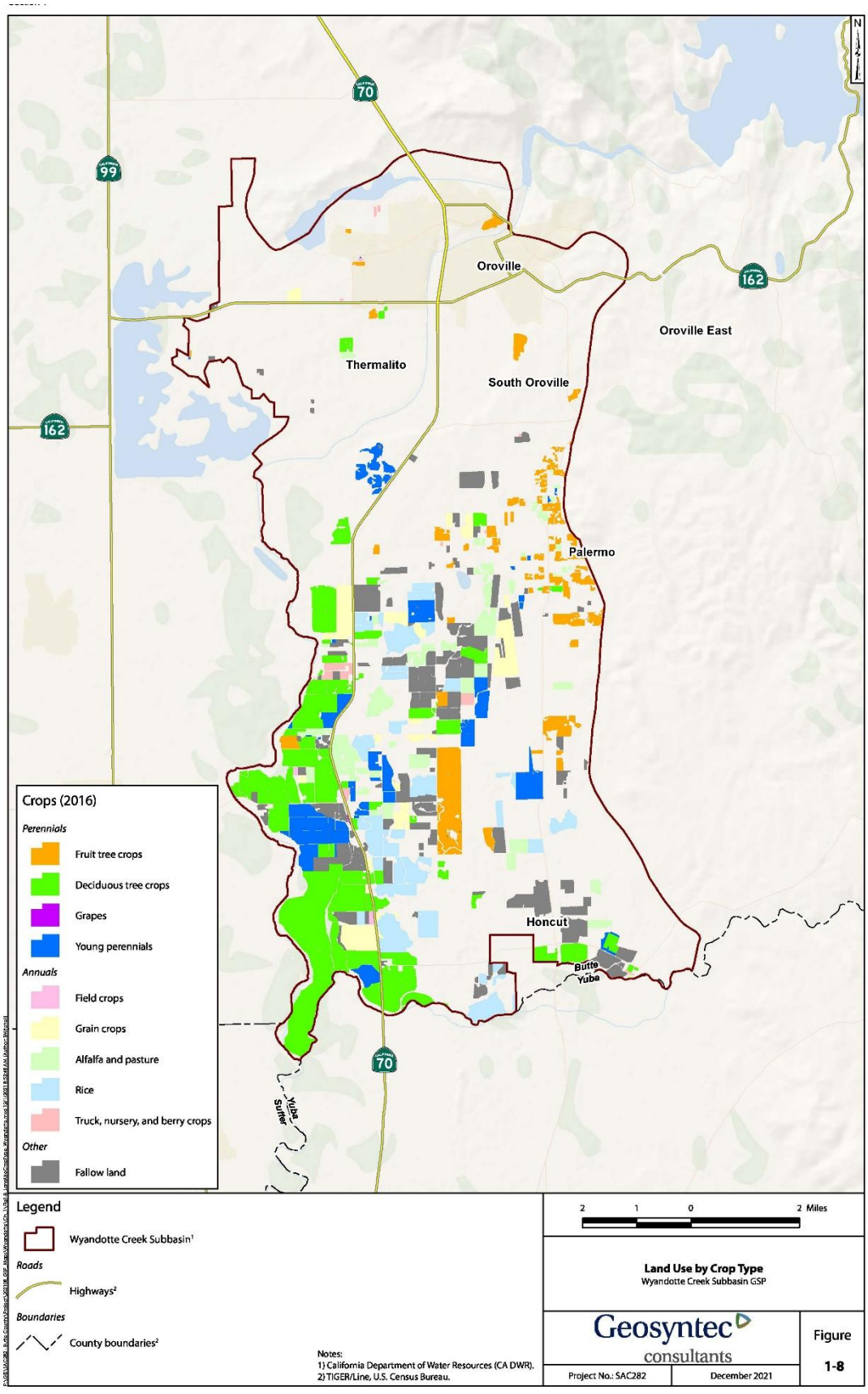


Figure 1-8: Land Use by Crop Type

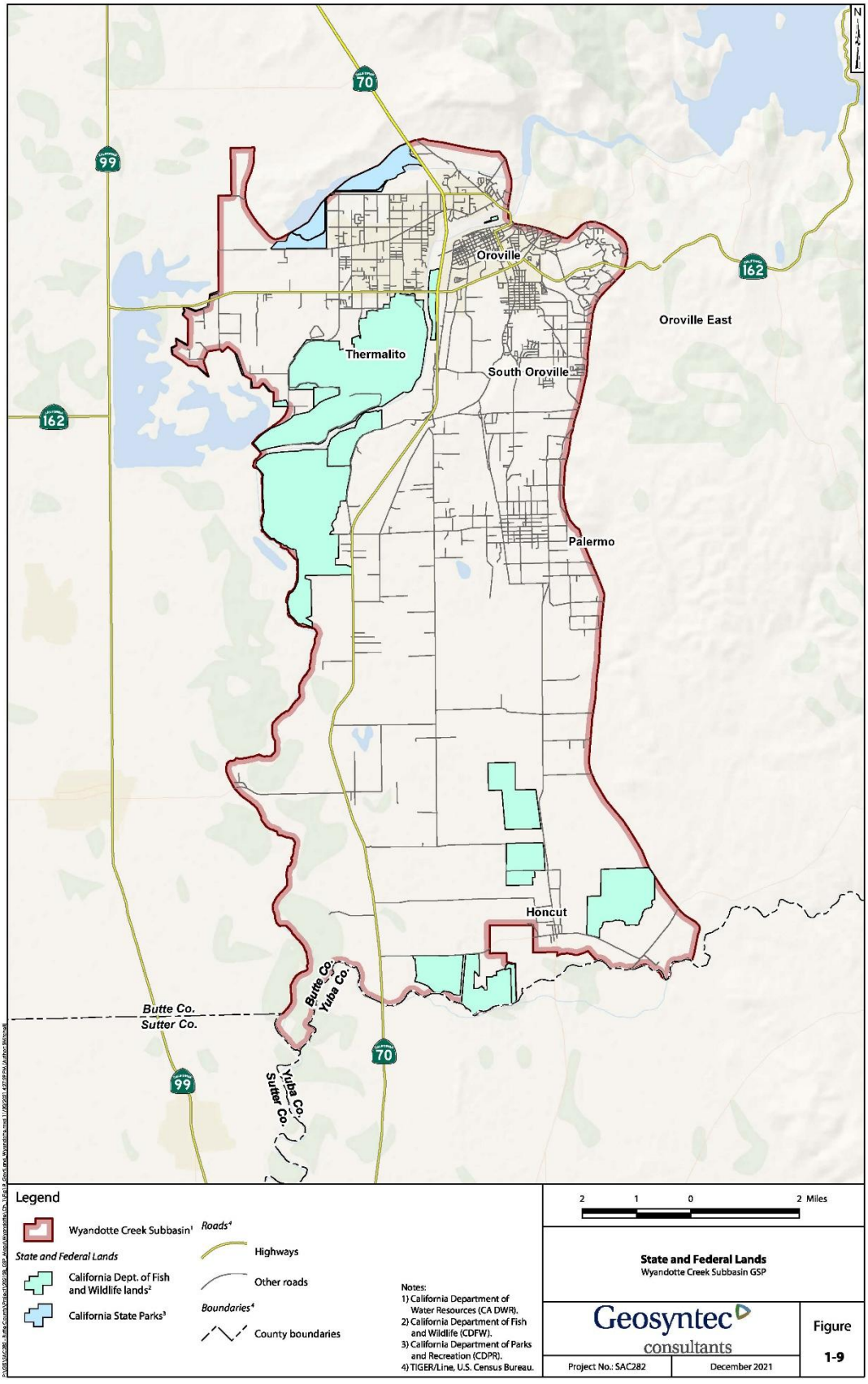


Figure 1-9: State and Federal Lands

Figure 1-10 through Figure 1-13 shows the density of domestic, public, industrial, and irrigation wells per square mile in the Wyandotte Creek Subbasin, as classified by the DWR Online System for Well Completion Reports (OSWCR), which is discussed in Section 1.3.5. Though there are overlaps and discrepancies in the designation of wells, domestic wells are largely private residential wells, public wells are municipal operated wells, and production wells are for irrigation, municipal, public, and industrial purposes (DWR, 2019b). Areas with few wells exist in the Wyandotte Creek Subbasin as shown in Figures 1-10 through 1-13. Wells containing groundwater level data are described further in Section 1.3.5. Community water systems, as defined by the State Water Resources Control Board (SWRCB), are wells serving 15 or more connections or more than 25 people per day.

Figure 1-14 shows locations of major rivers, streams, and creeks within the Wyandotte Creek Subbasin. The Feather River enters the subbasin in the northeast and then borders the subbasin on its western side. Other large surface water bodies bordering the subbasin include components of the Oroville Reservoir Complex including the Forebay and Thermalito Afterbay. The North, Middle, West, and South Forks of the Feather River originate outside the subbasin and together supply water to Lake Oroville with a portion of flow routed through the Thermalito Forebay and Afterbay facilities to generate hydropower and deliver irrigation water supply to the Butte Subbasin, with the remaining water returning to the Feather River. The Feather River serves as a source of municipal and irrigation supply in the subbasin through diversions by the TWSD and SFWPA.

Smaller local or ephemeral streams entering and traversing the subbasin include North Honcut Creek, Wyandotte Creek, Wyman Ravine and numerous unnamed waterways.

1.2.2 Management Areas

A Management Area (MA) refers to an area within a basin for which a GSP may identify different minimum thresholds (MTs), measurable objectives (MOs), monitoring, and projects and actions based on unique local conditions or other circumstances as described in the GSP regulations. The GSP must describe each MA, including rationale for approach and demonstrate it can be managed without causing undesirable results within or outside the MA. Two MAs, Wyandotte Creek Oroville and Wyandotte Creek South (Figure 1-1) are defined in the Wyandotte Creek Subbasin by the joint powers agreement forming the Wyandotte Creek GSA.

1.2.2.1 Definition and Reason for Creation

The Wyandotte Creek Oroville MA encompasses the area that overlies the municipal area within and adjacent to the City of Oroville. The Wyandotte Creek South MA overlies the areas of the Wyandotte Creek Subbasin south of the City of Oroville. The Wyandotte Creek GSA is the exclusive GSA for these two MAs.

Although all stakeholders have a shared interest in sustainable management of groundwater in this predominantly groundwater dependent subbasin, the landscape of beneficial users varies between MAs. Wyandotte Creek Oroville is predominantly an urban area with Cal Water providing groundwater supplies for residential and municipal use. To a very limited extent, private domestic wells provide the primary source of water to households or in some cases provide a secondary supply for outdoor water use. The Feather River enters the subbasin in the northeast and crosses this MA through the central portion.

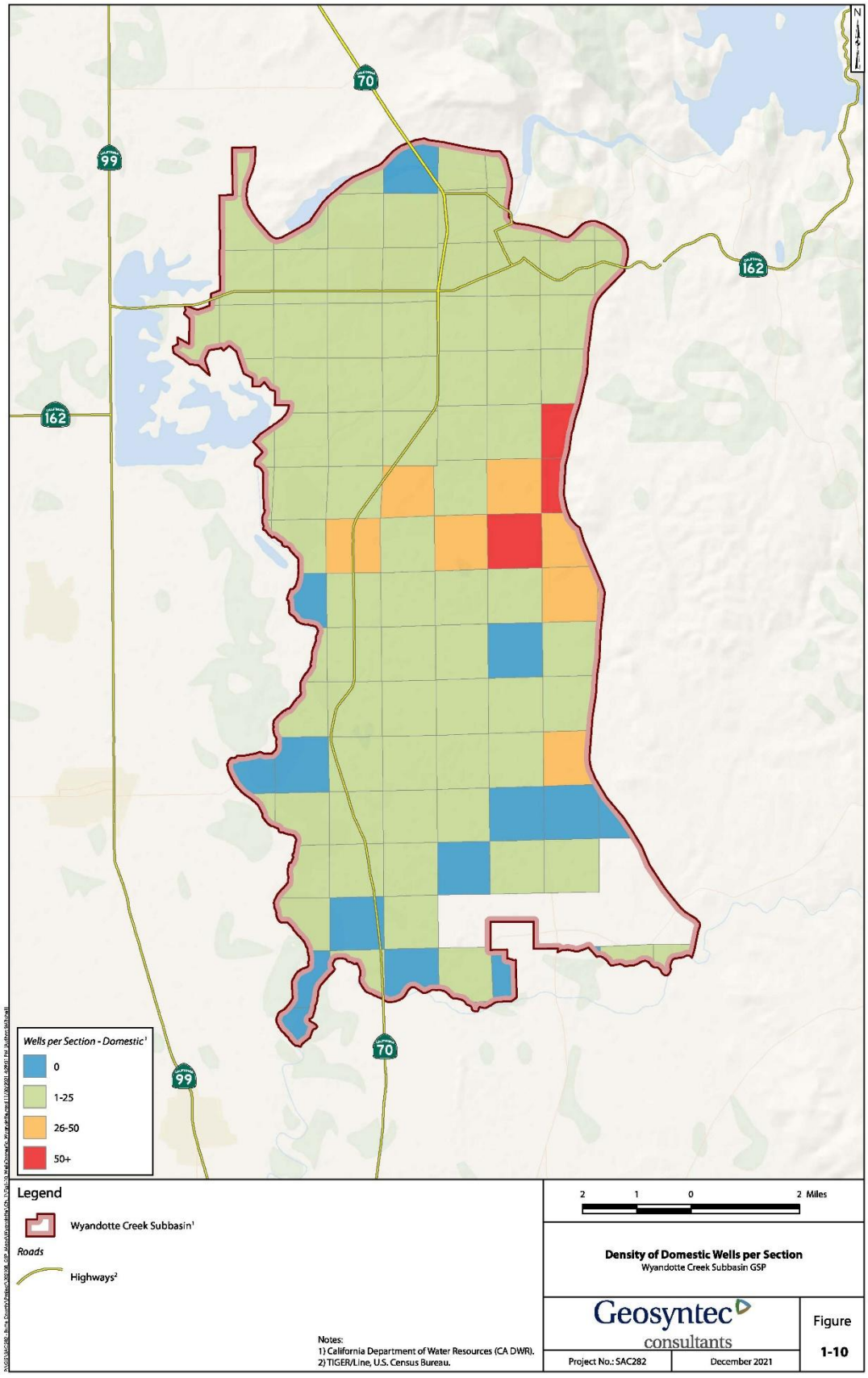


Figure 1-10: Density of Domestic Wells per Section

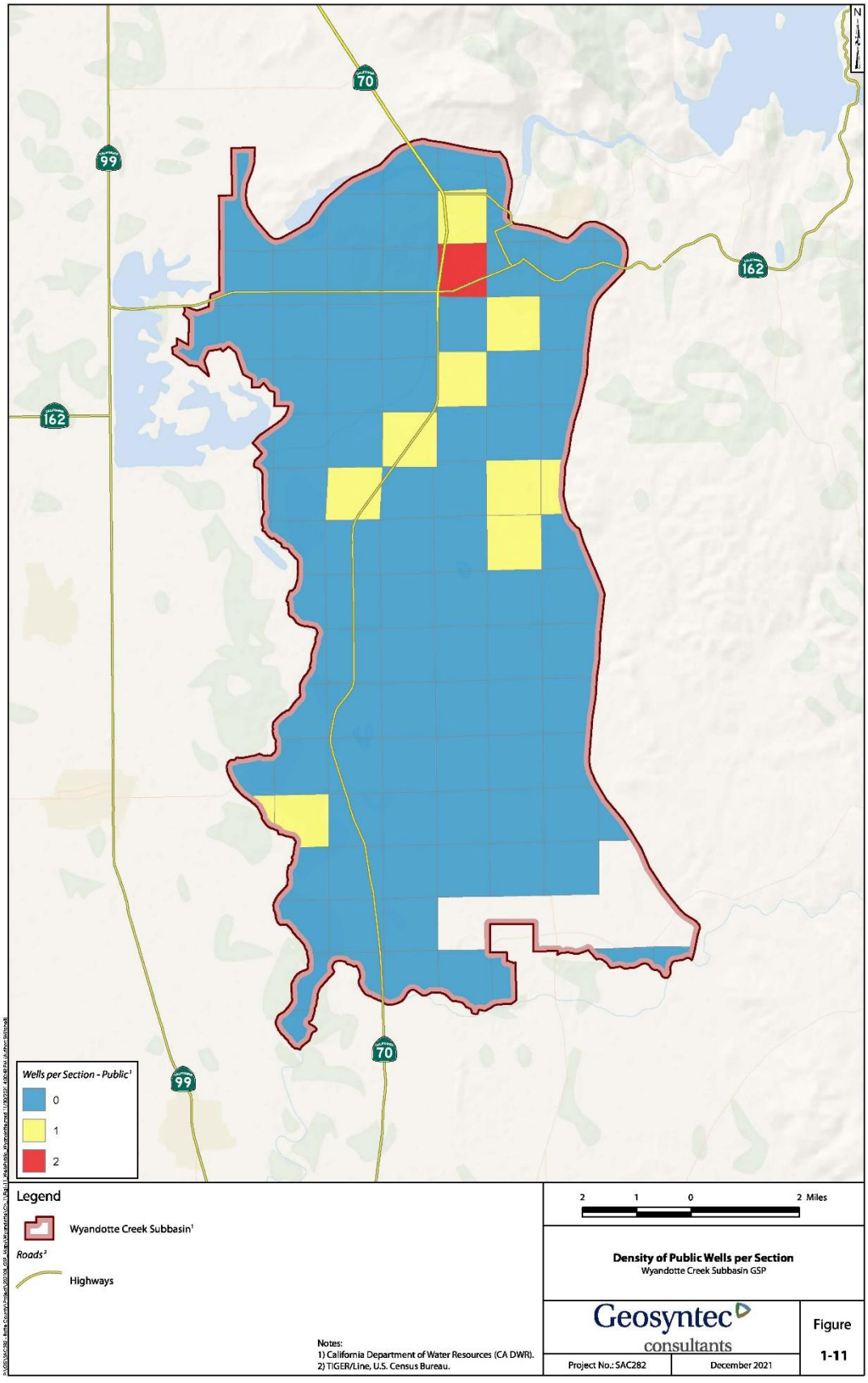


Figure 1-11: Density of Public Wells per Section

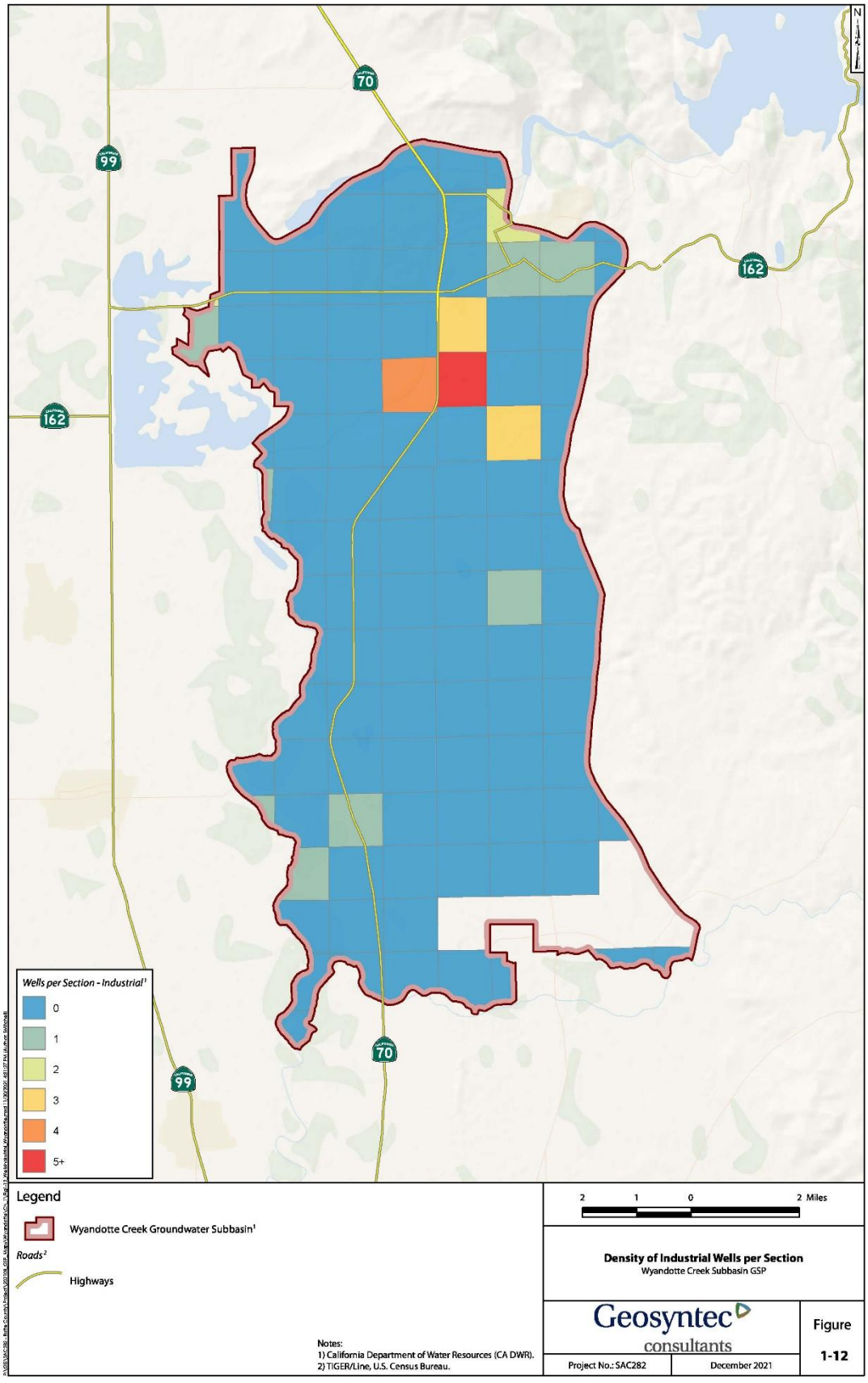


Figure 1-12: Density of Industrial Wells per Section

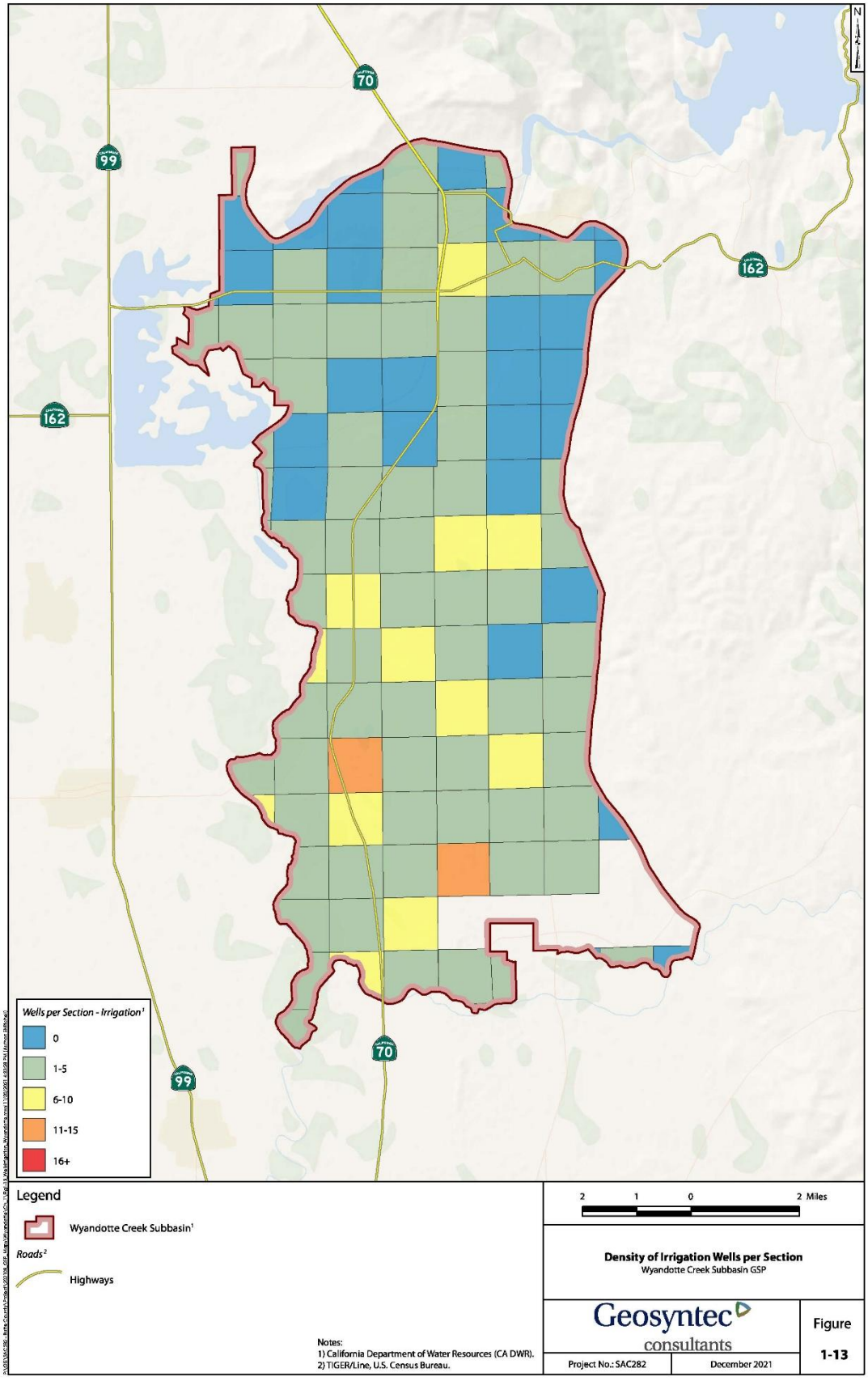


Figure 1-13: Density of Irrigation Wells per Section

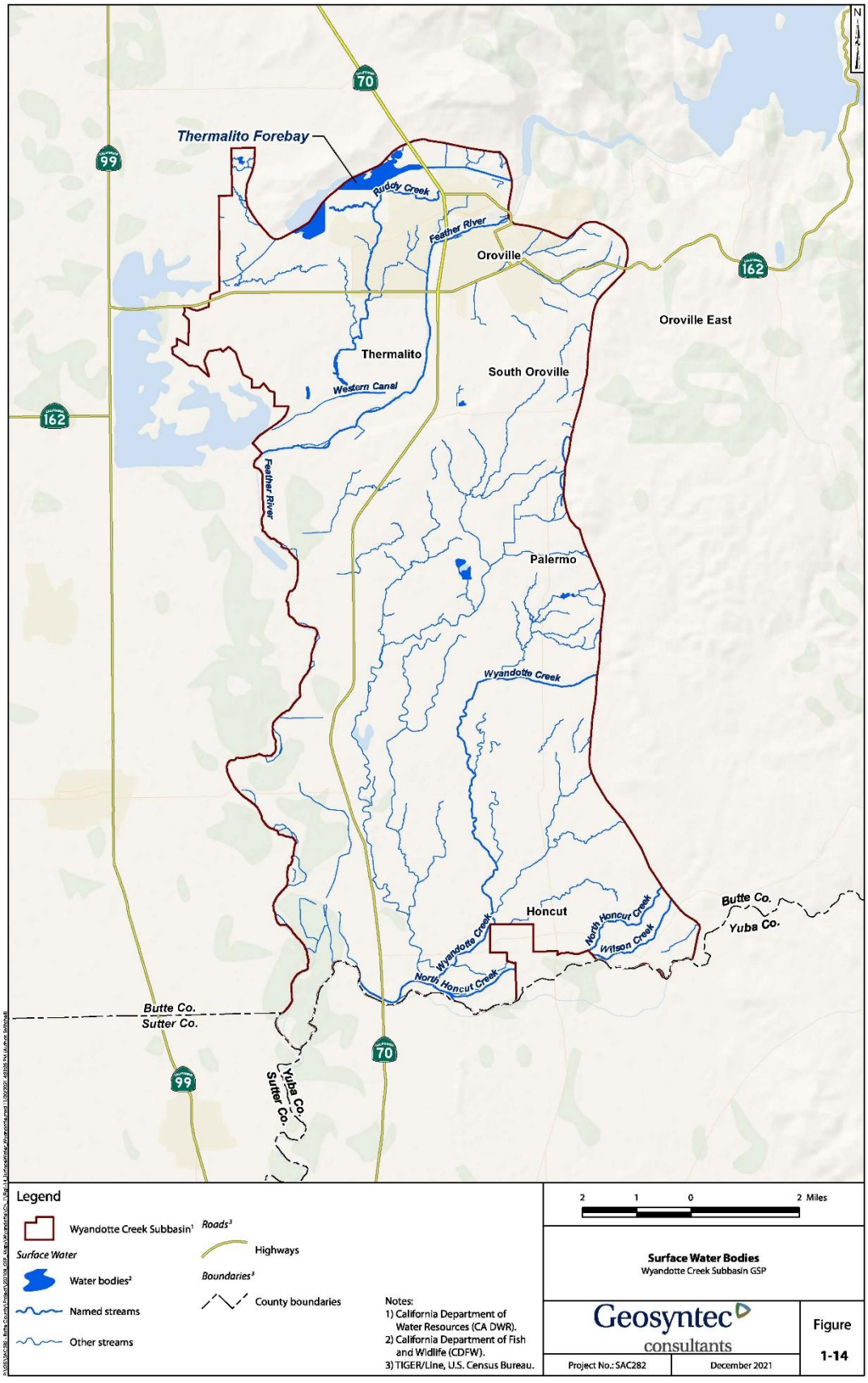


Figure 1-14: Surface Water Bodies

The Oroville Reservoir Complex including the Forebay and Thermalito Afterbay border this MA (Figure 1-13). The Feather River serves as a source of municipal and irrigation supply in the subbasin through diversions by the TWSD and SFWPA.

Wyandotte Creek South is dominated by irrigated agriculture dependent on groundwater and surface water diversions from the Feather River. Significant numbers of rural residents and ranchettes depend on groundwater typically from relatively shallow domestic wells interspersed with agricultural land uses. The Feather River enters this MA in the northeast then flows along the western boundary (Figure 1-14). Both perennial and ephemeral streams traverse Wyandotte Creek South including Honcut Creek and Wyandotte Creek.

The interests and vulnerability of stakeholders and groundwater uses in these MAs vary based on the nature of the water demand (agricultural, domestic, municipal), numbers and characteristics (i.e., depth) of wells supplying groundwater, and to some degree the hydrogeology and mix of recharge sources. The reason for creating these MAs in the Wyandotte Creek subbasin is to focus development of MTs, MOs, monitoring, and projects and actions in a way that best meets the mix of needs of the uses and users of groundwater unique to the MA. The defined MAs also allow Member Agencies to focus efforts and staff resources on development of portions of the GSP most relevant to stakeholders within their jurisdiction. These established MAs facilitate successful development and long-term implementation of the GSP by effectively targeting the needs, vulnerabilities, and opportunities of local conditions in these areas.

1.3 Management Programs

Existing management programs within the Wyandotte Creek Subbasin are described below.

1.3.1 Groundwater Management Plan

The County of Butte has a Groundwater Management Plan that covers the entire County except for areas covered by Urban Water Management Plans (UWMPs). The Butte County Groundwater Management Plan can be found at http://www.buttecounty.net/waterresourceconservation/groundwatermanagementplan

1.3.2 Urban Water Management Plans

TWSD, Cal Water, and SFWPA have prepared UWMPs.

1.3.2.1 Northern Sacramento Valley Integrated Regional Water Management Plan

Six counties, including Butte, Shasta, Tehama, Glenn, Colusa, and Sutter counties (Figure 1-15), of the Northern Sacramento Valley have been working together for over 10 years to lay the foundation for an integrated regional plan to address water-related issues such as economic health and vitality; water supply reliability; flood, stormwater, and flood management; water quality improvements; and ecosystem protection and enhancement. The counties have completed the development of a valley-wide IRWM Plan and have committed to continuing the efforts of regional water management through this plan. IRWM is a collaborative effort to enhance coordination of the water resources in a region. IRWM involves multiple agencies, stakeholders, tribes, individuals and groups to address water-related issues and offer solutions which can provide multiple benefits to the region.

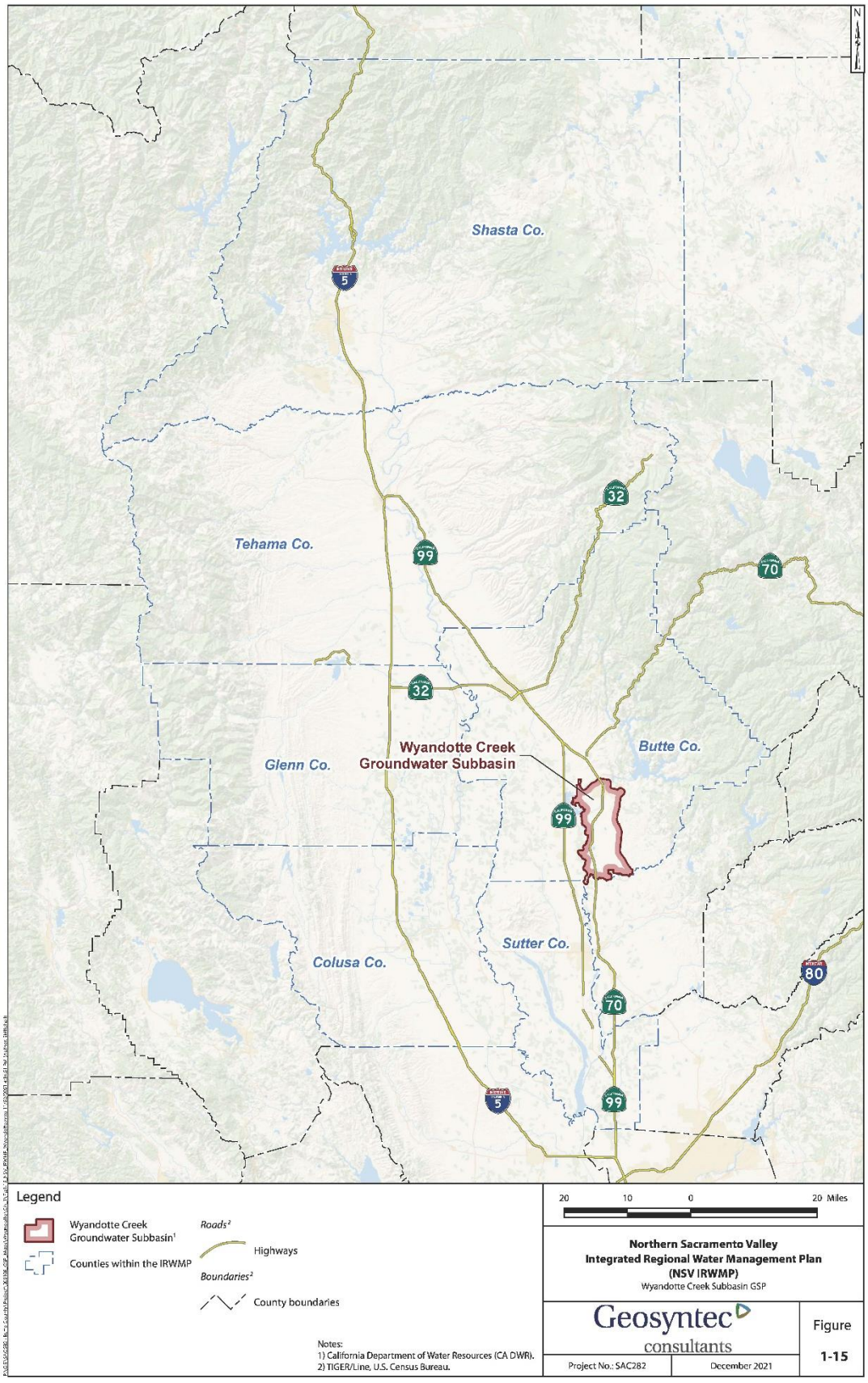


Figure 1-15: Northern Sacramento Valley Integrated Regional Water Management Plan

Representatives of the six counties are working in partnership with community stakeholders, tribes and the public to identify the water-related needs of the region. This information was used to develop goals and objectives of the IRWM Plan, and the identification of projects and programs to be included in the IRWM Plan. The IRWM Plan was adopted in April 2014 and updated in 2020 and better positions the region and local partners to receive funding for high-priority projects.

1.3.3 Drought Management Plans

The Butte County Drought Preparedness and Mitigation Plan (Drought Plan) was adopted in 2004 and was developed to protect the County from the effects of a drought. The Drought Plan includes: an overview of Butte County's drought background; institutional framework to approach drought; a monitoring plan; a response and mitigation plan; and a discussion of water transfers during a drought. The purpose of the Drought Plan is to provide an efficient and systematic process for Butte County that results in a short- and long-term reduction in drought impacts to the citizens, economy, and environment.

1.3.4 Conjunctive Use Programs

The Wyandotte Creek GSA is actively working with South Feather Water and Power Agency, Thermalito Water and Sewer District, Butte County's Palermo Master Drainage Planning efforts, and local stakeholders to implement a Regional Conjunctive Use Program. The Program is further described in Section 5: Projects and Management Actions.

1.3.5 General Plans in the Plan Area

The Wyandotte Creek Subbasin is subject to the Butte County General Plan 2030 and the City of Oroville General Plan. In 2018, the Camp Fire destroyed 18,000 structures in Butte County displacing over 27,000 residents. In 2020, the North Complex Fire destroyed homes in Berry Creek, Feather Falls and other areas. While the Town of Paradise, Concow, Berry Creek and other impacted areas rebuild, many residents have relocated to other parts of Butte County. The existing General Plans may not fully account for the relocation of Camp Fire survivors. A focused accounting of changes to residential land use as a result of the Camp Fire should be conducted.

1.3.5.1 Butte County General Plan 2030

The Butte County General Plan 2030 was adopted by the Butte County Board of Supervisors in October 2010. The General Plan 2030 identifies the goals, policies and actions governing land use in the unincorporated portions of Butte County. The General Plan 2030 reflects the community desire to conserve and enhance the legacy of their forebears, namely, sustainable development. To this end, the General Plan 2030 envisions and supports a Butte County in 2030 where:

- Urban development will be primarily centralized within and adjacent to the existing municipal limits and larger unincorporated communities. Urban development will have efficient, reliable public facilities and infrastructure. Employment centers and a range of services will be located near residential areas so that people spend less time in their cars. Residential communities will be walkable, bicycle facilities will be provided, and there will be access to public transit.

- Small unincorporated areas will be well-planned through community-driven planning processes so that community character is preserved, and adequate public services and facilities are provided. Rural residential development will be limited and will strive to be compatible with agricultural and environmental uses and will address wildfire risks and public service's needs.
- Agriculture and open space will continue to dominate Butte County's landscape and be an important part of the County's culture and economy. Existing agricultural areas will be maintained, and an array of agricultural services will support agriculture while providing new jobs to Butte County residents.

The General Plan 2030 includes an optional Water Resources Element in addition to the mandatory elements of Land Use, Housing, Economic Development, Agriculture, Circulation, Conservation and Open-space, Health and Safety and Public Facilities and Services. In adopting the Water Resources Element, the General Plan 2030 recognized the importance and interrelationship between land use and water resources management. The General Plan 2030 Water Resources Element has six goals:

- Maintain and enhance water quality.
- Ensure an abundant and sustainable water supply to support all uses in Butte County.
- Effectively manage groundwater resources to ensure a long-term water supply for Butte County.
- Promote water conservation as an important part of a long-term and sustainable water supply.
- Protect water quality through effective storm water management.
- Improve stream bank stability and protect riparian resources.

Key Water Resources Element policies include:

- W-P1.4: Where appropriate, new development shall be Low Impact Development (LID) that minimizes impervious area, minimizes runoff and pollution and incorporates best management practices (BMPs).
- W-P2.1: The County supports solutions to ensure the sustainability of community water supplies.
- W-P2.3: Water resources shall be planned and managed in a way that relies on sound science and public participation.
- W-P2.5: The expansion of public water systems to areas identified for future development on the General Plan land use map is encouraged.
- W-P2.6: The County supports water development projects that are needed to supply local demands.
- W-P2.8: The County supports Area of Origin water rights, the existing water right priority system and the authority to make water management decisions locally to meet the county's current and future needs, thereby protecting Butte County's communities, economy and environment.

- W-P2.9: Applicants for new major development projects, as determined by the Department of Development Services, shall demonstrate adequate water supply to meet the needs of the project, including an evaluation of potential cumulative impacts to surrounding groundwater users and the environment.
- W-P3.1: The County shall continue to ensure the sustainability of groundwater resources, including groundwater levels, groundwater quality and avoidance of land subsidence, through a basin management objective program that relies on management at the local level, utilizes sound scientific data and assures compliance.
- W-P3.2: Groundwater transfers and substitution programs shall be regulated to protect the sustainability of the County's economy, communities and ecosystem, pursuant to Chapter 33 of the Butte County Code.
- W-P3.3: The County shall protect groundwater recharge and groundwater quality when considering new development projects.
- W-P4.1: Agricultural and urban water use efficiency shall be promoted.
- W-P4.2: Water conservation efforts of local Resource Conservation Districts, the Natural Resource Conservation Service and irrigation districts should be coordinated.
- W-P4.3: The County shall work with municipal and industrial water purveyors to implement water conservation policies and measures.
- W-P4.4: Opportunities to recover and utilize wastewater for beneficial purposes shall be promoted and encouraged.
- W-P4.5: The use of reclaimed wastewater for non-potable uses shall be encouraged, as well as dual plumbing that allows graywater from showers, sinks and washers to be reused for landscape irrigation in new developments.
- W-P4.6: New development projects shall adopt BMPs for water use efficiency and demonstrate specific water conservation measures.
- W-P5.2: New development projects shall identify and adequately mitigate their water quality impacts from stormwater runoff.
- W-P5.3: Pervious pavements shall be allowed and encouraged where their use will not hinder mobility.

Implementation of the Wyandotte Creek GSP will provide sustainable groundwater management and is not anticipated to affect water supply assumptions in the General Plans. Information on the Butte County General Plan 2030 and related documents can be found at www.buttegeneralplan.net.

1.3.5.2 City of Oroville

The Oroville City Council adopted the Oroville 2030 General Plan in June 2009. In March 2015, the City Council adopted a targeted update to the 2030 General Plan referred to as the "Oroville Sustainable Code Updates," which included an expansion of Mixed-Use zoning within the city, resource-efficient design to the City's Design Guidelines, and a new Climate Action Plan. This targeted update sought to strengthen the environmental, community, and economic sustainability

of the community. The Oroville General Plan's goals, policies and actions are intended to work together to achieve the long-term vision for the city.

The Oroville General Plan seeks to promote high quality residential and commercial growth, support infill development, preserve and provide access to nature, create an appropriate transition between the urban and rural environment, and create a place people are proud to call home. To achieve the implementation of the Oroville General Plan, eight guiding principles have been adopted: livability; enhanced mobility; a vibrant local economy; natural resources and the environment; recreation; community infrastructure; health and safety; and an involved citizenry.

The State General Plan Guidelines call for the Oroville General Plan to address all land within the City limits, land within the City's designated Sphere of Influence (SOI), and other land in unincorporated Butte County which relates to the City's planning efforts.

Oroville General Plan Organization

State law requires the General Plan to address the subjects of land use, circulation, housing, noise, safety, conservation, and open space. Additional topics (or "elements") may be covered at the discretion of the jurisdiction, provided that they are consistent with one another. Oroville's General Plan includes the following optional elements: community design; economic development; and public facilities and services.

Parks, Public Facilities, and Services Element

The Oroville 2030 General Plan Public Facilities and Services Element mentions that:

"The City of Oroville does not provide water service directly. Oroville is served by three local domestic water providers: Cal Water, South Feather Power and Water, and the Thermalito Water and Sewer." The service breakdown in the General Plan for each water provider is as follows:

- "Cal Water Oroville supplies water to a large extent of Oroville south of the Feather River, including the Historic Downtown, the closest portion of the eastern foothills and South Oroville. Currently, Cal Water Oroville has a production potential of 10.7 million gallons per day (MGD), an amount more than adequate to meet the current maximum daily water demand of 6.3 MGD for the Cal Water Oroville area. Approximately 30 percent of their water supply is drawn from groundwater pumped from four wells, with the rest coming from surface water sources including the west fork of the Feather River."
- "South Feather Water and Power Agency supplies water to the eastern and southern portions of the City and SOI." The agency has approximately 171,500-thousand-acre feet (TAF) of storage capacity "sourced from the South Fork of the Feather River and from the Yuba River system, and is stored in reservoirs at Little Grass Valley, Sly Creek, Lost Creek, Ponderosa, Miner's Ranch, and Lake Wyandotte. South Feather Water and Power Agency delivers approximately 28,000 TAF of water annually and has the capacity to treat approximately 14.5 MGD."
- "Thermalito Water and Sewer District (TWSD) serves areas of the City of Oroville to the north and west of the Feather River as well as adjacent unincorporated areas of Butte County. TWSD has rights to approximately 8,200-acre feet of surface water from Concow Lake/Wilnore Reservoir with a 3.0 MGD backup supply coming from four wells, as needed. Total water consumption is currently 2.5 MGD annually for the TWSD and is expected to grow to just over 5.0 MGD by 2025. The District's water

supply is sufficient to meet this future demand as it has secured water rights to 7.3 MGD annually."

Relevant Goals, Policies, Actions relating to water supply is provided below:

- Goal PUB-6: Provide sufficient supplies of high-quality water to City residents and businesses to serve the City in the most efficient and financially-sound manner.
- Policy P6.1: Ensure that Oroville's potable water distribution and storage system is adequately sized to serve development allowed by the General Plan, without providing excess capacity.
- Policy P6.9: Support water conservation measures by working with the water districts and water companies to implement water conservation policies and measures.
- Policy P6.10: Encourage the use of drought-resistant landscaping and the use of reclaimed wastewater for agriculture and landscape irrigation supply water. Ensure that all reclaimed wastewater complies with State wastewater treatment and reclamation regulations and standards.
- Policy P6.11: Support all efforts to encourage water conservation by Oroville residents and businesses, and public agencies, including working with water providers, to implement water conservation programs and incentives that facilitate conservation efforts.
- Policy P6.12: Continue to participate in regional groundwater basin planning efforts to determine the carrying capacity of the groundwater aquifer and ensure that future demand for water does not overdraft the groundwater supply.
- Action A6.1: Conduct a study of using reclaimed wastewater for irrigation of public landscaping and for agriculture.
- Policy P8.6: Implement all necessary measures to regulate runoff from urban uses to protect the quality of surface and groundwater.
- Action A8.6: Prepare a stormwater management plan for the City to improve the quality of surface and groundwater. The Plan should include, but not be limited to, well-defined goals, policies, and actions to:
- Create effective partnerships with special districts, County, State and federal agencies, as well as non-profit organizations, in all aspects of plan development and implementation.
- Ensure the long-term financial viability of the plan through appropriate budgeting and allocation of financial and staff resources towards implementation of the plan.
- Identify clear criteria and an effective process to periodically review and evaluate the achievements of the plan and make amendments to it as needed.

Oroville Open Space, Natural Resources, and Conservation Element

The Oroville 2030 General Plan Open Space, Natural Resources, and Conservation Element acknowledges:

"Water quality is intimately tied to water supply, since adequate uncontaminated flows significantly mitigate the presence of contaminated flows, through dilution, flushing and general availability of alternate sources." Water quality is more greatly discussed in the Public Safety and Services Element of the General Plan, however, there are still relevant goals, policies, and actions discussed in this element relevant to surface and groundwater.

Relevant Goals, Policies, Actions relating to water quality is provided below:

- Goal OPS-11: Protect water quality and quantity in creeks, lakes, natural drainages, and groundwater basins.
- Policy P11.1: Maintain the natural condition of waterways and flood plains to ensure adequate groundwater recharge and water supply where feasible, given flood control requirements.
- Policy P11.2: Minimize impermeable paving that negatively impacts surface water runoff and groundwater recharge rates.
- Policy P11.3: Protect surface and groundwater resources from contamination from runoff containing pollutants and sediment, through implementation of the Central Valley Regional Water Quality Control Board's (CVRWQCB) BMPs.
- Action A11.1: Create a comprehensive mapping of groundwater resources in the Planning Area based on existing groundwater management studies and maps and, where necessary, new groundwater mapping studies to result in comprehensive coverage of the Planning Area.

Information on the City of Oroville 2030 General Plan and related documents can be found at

https://www.cityoforoville.org/services/planning-development-services-department/planning-division/planning-documents

1.3.6 Permitting of New Wells

The construction, repair or destruction of wells is subject to permitting by the Butte County Division of Environmental Health pursuant to Chapter 23B of the Butte County Code, Water Wells. The chapter provides minimum procedures for the proper construction of water wells and for the proper destruction of abandoned wells in order to ensure that water obtained from wells within the County of Butte will be suitable for the purposes for which used and that wells constructed or abandoned pursuant to this chapter will not cause pollution or impairment of the quality of the groundwater within the county. An additional purpose is to reduce potential well interference problems to existing wells and potential adverse impacts to the environment which could be caused by the construction of new wells or the repair or deepening of existing wells where a permit is required. Important provisions of the chapter include:

- The construction, repair, reconstruction, deepening, abandonment and destruction of wells in Butte County must follow the standards in Bulletin 74-81 and its supplement bulletin 74-90, Water Well Standards, State of California.
- After July 25, 1996, the pumping capacity of a new well cannot be greater than 50 gallons per minute per acre to reasonably serve the overlying land, including contiguous parcels of land under the same ownership as the land upon which the well is located.

- Wells can only be drilled by a person licensed to drill water wells pursuant to the provisions of Business and Professions Code section 7000 et seq. possessing a C-57 water well contractor's license required by section 13750.5 of the California Water Code.
- Domestic well owners are required to ensure that a new well will operate properly assuming a repeat of the groundwater conditions experienced during the period 1987 through 1994 in the area in which the new well is located.
- Well drillers reports must be filed with Butte County as well as with DWR.
- Notification of well permit applications are required in specific instances to adjoining landowners and/or local agencies with an adopted groundwater management plan pursuant to part 2.75 of division 6 of the California Water Code (commencing at section 10750). Landowners and/or local agencies are provided 30 days to provide comments prior to permit issuance.
- Wells with a casing diameter greater than 8 inches are required to be drilled at specific distances away from existing wells.
- In addition to well sealing requirements specified within state well standards bulletin 74-81 and bulletin 74-90, the seal shall be extended 5 feet into the first consolidated formation encountered below 15 feet to a maximum required sealing depth of 50 feet.

1.3.7 Land Use Plans Outside of the Wyandotte Creek Subbasin

The Yuba County General Plan and zoning ordinance is the only land use plan adjacent to the Wyandotte Creek subbasin. The Yuba County General Plan will not have any impact on the Wyandotte Creek GSP to achieve sustainable groundwater management. The Wyandotte Creek GSA will continue to monitor amendments to the Yuba County General Plan.

1.4 Groundwater Level Monitoring and Data Sources

Groundwater level programs predominantly used for development of the GSP include Butte County Department of Water and Resource Conservation (BCDWRC), Cal Water, California Statewide Groundwater Elevation Monitoring (CASGEM), and the California Department of DWR Water Data Library (WDL). Each of these programs are discussed below.

1.4.1 Butte County Department of Water and Resource Conservation

As discussed above, in November 1996, the voters in Butte County approved "AN ORDINANCE TO PROTECT THE GROUNDWATER RESOURCES IN BUTTE COUNTY." The ordinance is now codified as Chapter 33 of the Butte County Code relating to groundwater conservation. Section 3.01 of this code, Groundwater Planning Process, requires the preparation of a groundwater status report based upon the data gathered and analyzed pursuant to Section 3.02, Groundwater Monitoring. In 2000, the Butte County Board of Supervisors amended Chapter 33, the Groundwater Conservation Ordinance, to require the delivery of the Groundwater Status Report by February of each year. In 2010, the Water Commission designated the BCDWRC as the entity responsible for creating and submitting the annual report.

In February 2004, the Butte County Board of Supervisors adopted the Groundwater Management Ordinance, which was codified as Chapter 33A of the Butte County Code. Chapter 33A calls for the establishment of a monitoring network and Basin Management Objectives (BMOs) for

groundwater elevation, groundwater quality related to saline intrusion and land subsidence. The BMO concept was incorporated into California Water Code §10750 et. seq., as a component of AB 3030 Groundwater Management Plans. On September 28, 2004, the Butte County Board of Supervisors formally approved Resolution 04-181 adopting the countywide AB 3030 Groundwater Management Plan that includes components of the BMO program. In 2011, Chapter 33A was amended and retitled to "Basin Management Objectives" requiring a report each February describing conditions in the basin relative to established BMOs. The foregoing actions by the Board allow the consolidation of reporting of groundwater conditions from both Chapter 33 and 33A into a single report submitted by the Department on an annual basis in February. Considering new requirements of SGMA, revisions to Chapter 33A were approved in 2019 to continue the transition of groundwater management in Butte County from the BMO program to implementation of SGMA in each of the three subbasins in Butte County, including the Wyandotte Creek Subbasin. Groundwater level measurements occur 4 times per year following this program. Appendix 1-C provides the Groundwater Status Report for the 2025 Water Year following this program.

1.4.2 California Statewide Groundwater Elevation Monitoring

DWR maintains several groundwater level monitoring programs, tools, and resources covering California. The CASGEM Program is DWR's primary resource for groundwater level data and has been used extensively in the development of this GSP. The CASGEM Program was authorized in 2009 by SB X7-6 to establish collaboration between local monitoring parties and DWR to collect and make public statewide groundwater elevation data. The program provides the framework for local agencies or other organizations to "assume responsibility for monitoring and reporting groundwater elevations in all or part of a basin or subbasin" (Water Code §10927). The BCDWRC is the CASGEM monitoring entity for the Wyandotte Creek Subbasin. The groundwater monitoring program discussed above for BCDWRC complies with the reporting requirements of the CASGEM program.

1.4.3 Water Data Library

DWR's WDL contains measurements of groundwater elevations from water supply and monitoring wells monitored by numerous entities, such as DWR and local agencies. Groundwater level measurements available from the WDL are either continuously or periodically measured. Continuous measurements are provided by automatic water level measuring devices that take readings at wells; periodic measurements are manual recordings typically occurring at monthly or semi-annual time intervals. Measurements displayed through the WDL are taken through other programs, such as CASGEM. The WDL lists the organization responsible for collecting each water level measurement. The WDL water level measurements are available through the California Natural Resources Agency (CNRA) Open Data website as a bulk download, or through the WDL website on a per station basis.

1.4.4 Online System for Well Completion Reports

The OSWCR is a DWR program used to document and compile boring or well completion records throughout California. There are as many as 2 million domestic, irrigation, and monitoring water wells in California included in this dataset, including more than 4,000 domestic wells located in the Wyandotte Creek Subbasin. However, as discussed in Section 3, Sustainable Management Criteria, the well characteristics in this database are not always accurate or precise, and, unfortunately, it is not known which of the wells in the database are in use or have been

abandoned or replaced. When a well is constructed, modified, or destroyed, drilling contractors are required to submit a Well Completion Report to DWR for upload to the interactive OSWCR web site. OSWCR is used as a data source for wells identified for monitoring. In this GSP, the OSWCR database was used to describe the GSP area and identify sustainable management criteria (SMC).

1.5 Groundwater Quality Monitoring and Data Sources

Groundwater quality programs predominantly used for development of the GSP include BCDWRC, Sacramento Valley Water Quality Coalition (SVWQC), SWRCB Geotracker/ Groundwater Ambient Monitoring and Assessment Program (GAMA) and the DWR WDL. Each of these programs are discussed below.

1.5.1 Butte County Department of Water and Resource Conservation

As discussed in Section 1.3.4, the former BMO program (Chapter 33A) implemented by Butte County included groundwater quality monitoring. Although the ordinance sunset, the Butte County Department of Water and Resource Conservation continues to conduct groundwater quality trend monitoring and provides the data to GSAs within Butte County.

1.5.2 Sacramento Valley Water Quality Coalition

Because irrigated agriculture is the predominant land use in the Wyandotte Creek Subbasin, monitoring of the groundwater quality data developed through the Groundwater Quality Trend Monitoring Work Plan (GQTMWP) being implemented by the SVWQC for compliance with the Central Valley Regional Board's Irrigated Lands Regulatory Program (ILRP) is an important source of information to the GSA in the Wyandotte Creek Subbasin. This program is implemented by California Rice Commission (CRC) that submits annual reports on groundwater quality throughout the region.

1.5.3 Geotracker/Groundwater Ambient Monitoring and Assessment

GeoTracker, operated by the SWRCB, contains records for sites that require cleanup, such as leaking underground storage tank sites, Department of Defense sites, and cleanup program sites. GeoTracker also contains records for various unregulated projects as well as permitted facilities including: ILRP, future CV-SALTS, oil and gas production, operating permitted underground storage tanks, and land disposal sites. GeoTracker receives records and data from SWRCB programs and other monitoring agencies.

The Geotracker System also contains links to GAMA. The GAMA Program is California's comprehensive groundwater quality monitoring program that was created by the SWRCB in 2000. It was later expanded by AB 599 - the Groundwater Quality Monitoring Act of 2001. AB 599 required the State Water Board, in coordination with an Interagency Task Force (ITF) and Public Advisory Committee (PAC) to integrate existing monitoring programs and design new program elements as necessary, resulting in a publicly accepted plan to monitor and assess groundwater quality in basins that account for 95% of the state's groundwater use. The GAMA Program is based on interagency collaboration with the State and Regional Water Boards, DWR, Department of Pesticide Regulations, United States Geological Survey (USGS), and Lawrence Livermore National Laboratory, and cooperation with local water agencies and well owners.

1.5.4 Water Data Library

DWR's WDL contains groundwater quality data in addition to the groundwater level records described previously. This information includes data from discrete groundwater quality samples collected by DWR and other cooperating entities. These water quality data list the entity responsible for taking the sample but do not specify what program the sample was taken under. The WDL water quality measurements are available through the CNRA Open Data website as a bulk download, or through the WDL website on a per-station basis. WDL water quality measurements in this GSP are utilized for basin characterization but are acquired from the other programs.

1.6 Land Subsidence

To determine whether subsidence is occurring, a land subsidence monitoring network was established throughout Butte County consisting of observation stations and extensometers managed by DWR. Within the Wyandotte Creek Subbasin this network of monuments existed between 2008 to 2017 and has been replaced by data from satellite- and aircraft-based Interferometric Synthetic Aperture Radar (InSAR) from DWR. As of 2025, one GPS station continues to record vertical displacement within the Subbasin.

A summary of the historic information within the Wyandotte Creek Subbasin obtained from these networks is presented in Section 2, Basin Setting, and the monitoring network for implementation of the GSP is discussed in Section 4, Monitoring Networks.

1.6.1 DWR Subsidence Network

The historic observation stations were a result of DWR's efforts to establish a subsidence monitoring network across the valley to capture changes in the ground surface elevation. The observation stations were established monuments with precisely surveyed land surface elevations. They were distributed throughout the valley such that the entire county is well represented. In 2008, DWR along with numerous partners performed the initial GPS survey of the observation stations to establish a baseline measurement for future comparisons. The network was resurveyed in 2017 using similar methods and equipment as those used in the 2008 survey and results were analyzed to depict the change in elevation at each station between those years. Results of the survey are available here,

https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#landsub

Extensometers within Butte County but outside the Subbasin remain active. They are installed in wells or boreholes and are a more site-specific method of measuring land subsidence as they can detect changes in the thickness of the sediment surrounding the well due to compaction or expansion. These instruments can detect very slight changes in land surface elevation on a continuous basis with an accuracy of +/- 0.01 feet or approximately 3 millimeters. The three extensometers in Butte County have a period of record beginning in 2005 and were chosen by DWR based on a high likelihood of seeing subsidence in these areas if it were to occur, based on the presence of known clay and other fine-grained deposits in these areas. Data are available through July 2020 from the DWR WDL.

1.6.2 Interferometric Synthetic Aperture Radar (InSAR) Satellite Data

DWR provides Interferometric Synthetic Aperture Radar (InSAR) satellite data available on their SGMA Data Viewer web map[4] and DWR WDL, including downloadable raster datasets to estimate subsidence (DWR contracted TRE Altamira to make this data available). The dataset is generated from two satellites operated by the Sentinel mission, which is part of the European Radar Observatory for the Copernicus joint initiative of the European Commission and the European Space Agency (ESA). Data calibration uses Global Navigation Satellite System (GNSS) stations within California and one GNSS station resides within Butte County near Lake Oroville. The dataset nearly covers the entire Subbasin, with some gaps in the southwest. The TRE Altamira InSAR dataset provides estimates of total vertical displacement from June 2015 to Present.

1.7 Interconnection of Databases

Several of the databases discussed above utilize the same water level or water quality data. These records often specify the monitoring entity responsible for the measurement. Although these data overlap between databases, the correlation between databases is not specified. For example, water level data in the WDL are also in CASGEM, but this link is not mentioned in WDL records. This lack of connection poses problems for gathering water level and quality data throughout California. Efforts have been made in the development of this GSP to overcome the issue related to overlap and poor correlation between databases, but the issue remains. It is recommended that agencies work together to utilize a common unique identifier to ease use of multiple datasets.

1.8 Notice and Communication (23 California Code of Regulations § 354.10)

1.8.1 Notice of Intent to Adopt GSP

A notice of intent (NOI) to adopt the 2022 GSP and amended 2027 GSP were signed by the GSA and distributed on June 28, 2021 and December 17, 2026; respectively. The hard copies of the NOIs were mailed to cities and counties within the Wyandotte Creek Subbasin including the following:

- Butte County
- City of Oroville

Copies of the NOIs are provided in Appendix 1-B.

1.8.2 Overview

California's SGMA of 2014 requires broad and diverse stakeholder involvement in GSA activities and during the development and implementation of GSPs for groundwater basins around the state, including the Wyandotte Creek Subbasin. The intent of SGMA is to ensure successful, sustainable management of groundwater resources at the local level, success of GSP development and implementation will require cooperation by all beneficial users (defined below). Therefore, coordinated communication and consistent messaging of valid information

[4] https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#landsub

and facilitation of opportunities for the involvement of beneficial users will guide the path forward.

To facilitate stakeholder involvement in the GSA process, a Communication and Engagement Plan (C&E Plan) (Appendix 1-D) was created for the Wyandotte Creek GSA. The desired outcomes and goals of the C&E Plan were to achieve understanding and support for GSP adoption and implementation in consideration of the people, economy, and environment within the subbasin and in coordination with adjacent subbasins.

Plan Goals:

1. Enhance understanding and inform the public about water and groundwater resources in the Wyandotte Creek Subbasin, the purpose and need for sustainable groundwater management, the benefits of sustainable groundwater management, and the need for a GSP.
2. Engage diverse interested parties and stakeholders and promote informed feedback from stakeholders, the community, and groundwater-dependent users throughout the GSP preparation and implementation process.
3. Coordinate communication and involvement between the GSA (Board, Stakeholder Advisory Committee and Management Committee), and other local agencies, elected and appointed officials, and the public.
4. Rely on the WAC to facilitate a comprehensive public engagement process.
5. Employ a variety of outreach methods that make public participation accessible and that encourage broad participation.
6. Respond to public concerns.
7. Provide accurate and up-to-date information.
8. Create public value and use GSA resources wisely by managing communications and engagement in a manner that is resourceful and efficient.

1.8.3 Description of Beneficial Uses and Users in the Wyandotte Creek Subbasin

SGMA calls for consideration of all interested parties that the GSA must consider when developing and implementing the GSP. GSAs must encourage the active involvement of diverse social, cultural, and economic elements of the population. Therefore, stakeholders or beneficial users are any stakeholders who have an interest in groundwater use and management in the Wyandotte Creek Subbasin. Their interest may be related to GSA activities, GSP development and implementation, and/or water access and management in general.

To assist in identifying categories of beneficial users in the Wyandotte Creek Subbasin, the C&E Plan listed broad categories of interested parties to be considered during development and implementation of the GSP. These include, but are not limited to:

- General public
- Agricultural users of water
- Domestic well owners
- Municipal well operators

- Public water systems
- Land use planning agencies
- Environmental users of groundwater
- Surface water users
- The federal government
- California Native American tribes
- DACs and historically underrepresented groundwater users (including those served by private domestic wells or small community water systems)

Table 1-1 further identifies potential stakeholder groups and engagement purpose.

Table 1-1: Stakeholder Engagement Chart for Groundwater Sustainability Plan Development

Category of Interest	Examples of Stakeholder Groups	Engagement Purpose
General Public	• Citizens groups • Community leaders • Service clubs and professional organizations	Inform to improve public awareness of sustainable groundwater management
Private/Other users	• Private pumpers • Domestic users • School/College systems • Hospitals: Oroville Hospital	Inform and involve to minimize negative impact to these users
Urban/Agriculture users	• Water agencies: Cal Water • Colleges/Universities • Water associations • Commissions: SC-OR Sewerage Commission - Oroville Region • Water districts: TWSD; SFWPA • Mutual water companies • Resource conservation districts • Farm Bureau: Butte County Farm Bureau • Parks: Feather River Recreation and Park District	Collaborate to ensure sustainable management of groundwater
Industrial users	• Commercial and industrial self-supplier • Local trade association or group	Inform and involve to avoid negative impact to these users
Land Use Planning Agencies	• Municipalities (City, County planning departments): City of Oroville, Butte County • Regional land use agencies	Consult and involve to ensure land use policies are supporting GSPs
Environmental and Ecosystem	• Regional agencies: Butte County Resource Conservation District • Federal and State agencies: California Department of Fish and Wildlife (CDFW) • Environmental groups: Butte Environmental Council, The Nature Conservancy (TNC)	Inform and involve to sustain a vital ecosystem

Category of Interest	Examples of Stakeholder Groups	Engagement Purpose
Economic Development	• Chambers of commerce: City of Oroville • Business groups/associations • Elected officials (Board of Supervisors, City Council) • State Assembly members • State Senators	Inform and involve to support a stable economy
Human right to water	• DACs • Small community systems • Environmental Justice Groups: Leadership Council for Justice and Accountability, Self-Help Enterprises, Community Water Center	Inform and involve to provide a safe and secure groundwater supplies to all communities reliant on groundwater. The Butte County OEM Drought Assistance Program assists the public with dry domestic wells by providing water deliveries and/or water storage tanks.
Tribes	• Federally Recognized Tribes and non-federally recognized Tribes with Lands or potential interests in Wyandotte Creek Subbasin: Concow-Maidu Tribe of the Mooretown Rancheria, Tyme Maidu Tribe of the Berry Creek Rancheria	Inform, involve and consult with tribal government
Federal lands	• United States Bureau of Reclamation (USBR) • Bureau of Land Management	Inform, involve and collaborate to ensure basin sustainability
Integrated Water Management	• Regional water management groups (IRWM regions); Upper Feather River IRWM and the North Sacramento Valley (NSV) IRWM group • Flood agencies	Inform, involve and collaborate to improve regional sustainability

1.8.4 Communications

1.8.4.1 Decision-making Processes

As noted above, the Wyandotte Creek Subbasin consists of one GSA for GSP implementation, the Wyandotte Creek GSA.

The Wyandotte Creek GSA Board is the final decision-maker for the Wyandotte Creek Subbasin. To assist in GSP development, the Wyandotte Creek GSA convened a WAC in 2020. The composition of the WAC is intended to represent the beneficial uses and users of groundwater in the Wyandotte Creek GSA. The WAC was originally organized to comprise seven at-large members appointed by the GSA Board and one member representing Cal Water Oroville, one member representing SFWPA, and tribal representatives. The at-large positions include three agricultural groundwater users, two domestic well users, and one environmental and one business association representative. During the 2022 GSP preparation there were three agricultural members, one member from Cal Water and one member from SFWPA on the WAC. The WAC is charged with actively engaging with the public for input and feedback.

The representatives attending the GSA Management Committee meetings are designated staff from the member agencies; City of Oroville, Butte County, and TWSD. In addition to coordinating the WAC and GSA Board business, the GSA Management Committee assists the WAC in identifying and clarifying recommendations for GSP development and implementation which were presented to the GSA Board in public meetings as well as at subbasin-wide public meetings.

1.8.4.2 Public Engagement Opportunities

There were a number of different meetings at which the public had the opportunity to engage during the GSP development and amendment process:

- GSA Board meetings: The Wyandotte Creek GSA Board held regular public meetings, including joint meetings, to facilitate public input.
- WAC meetings.
- Public Workshops.
- Subbasin-wide Technical Advisory Committee meetings.
- Farm Bureau Water Forum meetings.
- City of Oroville.
- Regional Water Management Group.

1.8.4.3 Encouraging Active Involvement

The GSA carried out community engagement during the development of the GSP, which included meetings and presentation materials to inform the public. The GSP has been revised to incorporate public feedback. There were also activities related to encouraging involvement and building capacity for engagement. The GSA Management Committee used a variety of tools to solicit input, including maintaining an up-to-date website with announcements, calendar of events and meetings, and links to draft chapters of the GSP; establishing an interested parties list; email newsletters; and public notices. These documents encouraged and prepared community members to participate in GSP development by providing technical information as well as information about opportunities for engagement.

As part of the 40-day public review period initiated on September 9, 2021, the GSA Management Committee worked with the numerous entities to inform them about the plan and encourage their involvement. Appendix 1-D lists the SGMA public meetings that were held throughout the GSA formation and GSP preparation process.

1.8.4.4 Soliciting Written Comments

In addition to soliciting feedback at GSA meetings, opportunities were provided to offer written comments on the various chapters of the GSP as draft versions became available. Stakeholders could provide comments via an online comment form, letter, or email. An informal comment period began when the draft of the first chapter of the GSP was released in April 2019, and another public comment period began on the date the full draft of the GSP was released, in September 2021. In addition, a Public Workshop was held on October 20, 2021, to solicit written comments. All comments received via the comment form, letter, or email were provided to the WAC and Wyandotte Creek GSA Board in agenda packets for review.

The written comments and responses to the 2022 GSP can be found in Appendix 1-E.

A public comment period on the draft Periodic Evaluation and Amended GSP took place from August 25, 2026, to September 30, 2026, where stakeholders and interested parties could submit comments. Public comments were reviewed by the GSA and incorporated into the final Amended GSP or identified for further evaluation. Comments are available in Appendix 1-F of the amended GSP.

1.8.5 Informing the Public about Groundwater Sustainability Plan Development Progress

1.8.5.1 Interested Parties List

An email distribution list of subbasin-wide stakeholders and beneficial users was developed for outreach throughout the GSP planning process. The list was maintained and updated by the Wyandotte Creek GSA Management Committee. Any interested member of the public could request to be signed up via this link: Contact Us - Wyandotte Creek GSA (wyandottecreekgsa.com)

1.8.5.2 Distribution of Flyers

Typically, before a public meeting in the Wyandotte Creek Subbasin, an email flyer was created with key information provided. The flyer was emailed out to the Interested Party list as well as posted on Member Agency websites and various places throughout the subbasin.

1.8.5.3 Press Outreach

Press releases were issued at key junctures and decision-making points for the Wyandotte Creek Subbasin.

1.8.5.4 A Centralized Wyandotte Creek GSA Website

Throughout the planning process (and beyond) the Wyandotte Creek GSA has maintained a website with information about subbasin-wide planning efforts related to SGMA.

The Wyandotte Creek Subbasin website contains:

- Homepage with links to key pages within the site including a link to draft copies of the GSP
- About Us with an overview of the Wyandotte Creek GSA and SGMA
- Governance that describes the structure of the GSA, Board Members, WAC Members, Meeting Dates and Agendas, and Transparency Documents
- SGMA Overview
- Calendar of Board and WAC Meetings and Workshops
- Contact Us page for email correspondence and to register for the email list

1.8.5.5 Stakeholder Input and Responses

The engagement opportunities described above provided various avenues for stakeholders to provide input on GSP development. The matrix in Appendix 1-E summarizes the public comments received, organized by commenter, organization, chapter/section/line of comment

location, comment, and location of where the comment was addressed or changed within the final draft document, as applicable.

1.9 Human Right to Water

Not formerly included in DWR's GSP checklist, but still important to address, is human right to clean water. California Water Code Section 106.3, Human Right to Water, states that "every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes." Private domestic well groundwater pumper representation on the Advisory Committee and community engagement via public workshops and outreach are venues through which those potentially most vulnerable to loss of clean drinking water can share information and concerns throughout the GSP development and implementation. During preparation of this GSP public meetings were held at times, locations, and in a manner both in-person and remotely online that supported and allowed for effective engagement of all stakeholders.

2. BASIN SETTING

2.1 Hydrogeologic Conceptual Model

A Hydrogeologic Conceptual Model (HCM) identifies the major factors contributing to groundwater flow and movement and how different physical features and characteristics affect conditions within a subbasin. This section describes the HCM for the Wyandotte Creek Subbasin. The HCM serves as an important component of the basin setting, providing the framework for understanding groundwater conditions and water budgets.

Much of the information in this section is from existing reports detailing the hydrogeology of the Sacramento Valley and the formations making up the aquifer systems in the groundwater basin. These reports by DWR include the Geology of the Northern Sacramento Valley, 2014 (DWR, 2014), the Butte County Groundwater Inventory Analysis, 2005 (DWR, 2005), and work by Blair et al. (1991). Better understanding the hydrogeology, aquifer dynamics, and recharge paths of the aquifer systems in the Northern Sacramento Valley region is an area of active research by local agencies, DWR, and others.

2.1.1 Basin Boundaries

2.1.1.1 Lateral Boundaries

The Wyandotte Creek Subbasin lies in the eastern central portion of the Sacramento Groundwater Basin. It is bounded on the west by the Feather River and Thermalito Afterbay; in the south by the Butte-Yuba County line (except for Ramirez Water District which is fully within the North Yuba Subbasin); and on the north and east by the edge of the alluvial basin as defined by DWR Bulletin 118 - Update 2003 (DWR, 2003). It is surrounded by the Butte Subbasin to the west, the Vina Subbasin to the north, the North Yuba Subbasin to the south and the foothills to the east.

2.1.1.2 Bottom of Basin

The definable bottom of the basin is described in Bulletin 118 subbasin report (DWR, 2006) as part of the North Yuba Subbasin (which at that time included what is now the Wyandotte Creek Subbasin) as follows:

> *The [Wyandotte Creek] Subbasin aquifer system is comprised of continental deposits of Quaternary to Late Tertiary (Pliocene) age. The cumulative thickness of these deposits increases from a few hundred feet near the Sierra Nevada foothills on the east to over 1,000 feet along the western margin of the basin.*

Groundwater occurs in the heterogeneous gravel and sand layers and the base of the Laguna Formation is generally accepted as the base of fresh water (Olmsted and Davis, 1961, as cited in DWR, 2014). However non-saline water has been observed in the underlying Ione formation (Dames and Moore, 1994) and Blair and others (1991) identified the base of the Mehrten Formation as the base of fresh water in portions of the Wyandotte Creek Subbasin.

Locally, the base of fresh groundwater fluctuates depending on local changes in the subsurface geology and geologic formational structure (DWR, 2005). In the DWR 2005 report, 600 feet was used as the average base of fresh water. In contrast, in an unpublished study by Bookman -Edmonston Engineering, Inc (1992) a thickness of 200 feet was assumed for estimating groundwater storage capacity (as cited in DWR, 2006). Because of the inconclusive

data on the location of the base of fresh groundwater, this remains an area requiring additional data to improve characterization of the aquifer system.

2.1.2 Topography, Surface Water and Recharge

2.1.2.1 Terrain and Topography

The Wyandotte Creek Subbasin lies southwest of Lake Oroville. The northeastern area of the subbasin has steeper and more varied terrain. Land surface elevation varies from approximately 90-100 feet above mean sea level (amsl) along the western edge near the Feather River and the southern edge along Honcut Creek, to over 200 feet amsl at the edge of the foothills on the eastern side. In general, the area slopes in a southwesterly direction toward the Feather River.

Figure 2-1 shows the surface topography of the Wyandotte Creek Subbasin.

2.1.2.2 Soils

The area along the Feather River is underlain by lighter textured soils characterized by high infiltration rates. These areas correspond to land uses dominated by irrigated orchards. Most remaining areas of the subbasin has soils with slow to very slow infiltration rates. Soils with slow infiltration rates or a restrictive layer are well suited for growing rice. Figure 2-2 shows the distribution of Hydrologic Soil Groups for the Wyandotte Creek Subbasin. Soils designated as C/D are lands having soils that would have been classified as having very low infiltration (Group D) but have characteristics such as natural slope or management improvements that improved their drainage relative to that of similar soils.

Based on the Digital General Soil Map of the United States, or STATSGO2, soil data for the Wyandotte Creek Subbasin, the dominant soil mapping unit within the area is Redding-Corning, which is moderately well drained and represents approximately 64.3% of the subbasin. Other prominent soils within the subbasin include Riverwash-Dumps-Cortina (13.1% of area), and Tisdale-Kilaga-Conejo (13.6% of area). Characteristics of these soils are summarized in Table 2-1. The distribution of prominent soils (e.g., "map units") in the subbasin is shown in Figure 2-3.

Table 2-1: STATSGO2 Soil Table for Wyandotte Creek Subbasin

Soil Map Unit	Percent of Area	Sum of Acres	Slope Range	Drainage
Wyandotte Creek Subbasin	100%	59,382		
Goulding-Auburn (s646)	0.7%	420	27.8	Well drained
Redding-Corning (s821)	64.3%	38,175	5.3	Moderately well drained
Riverwash-Dumps-Cortina (s648)	13.1%	7,783	2.6	Well drained
Stockton-Clear Lake-Capay (s824)	0.2%	108	1	Poorly drained
Sycamore-Shanghai-Nueva-Columbia (s855)	8.1%	4,822	1	Somewhat poorly drained
Tisdale-Kilaga-Conejo (s870)	13.6%	8,047	1	Well drained

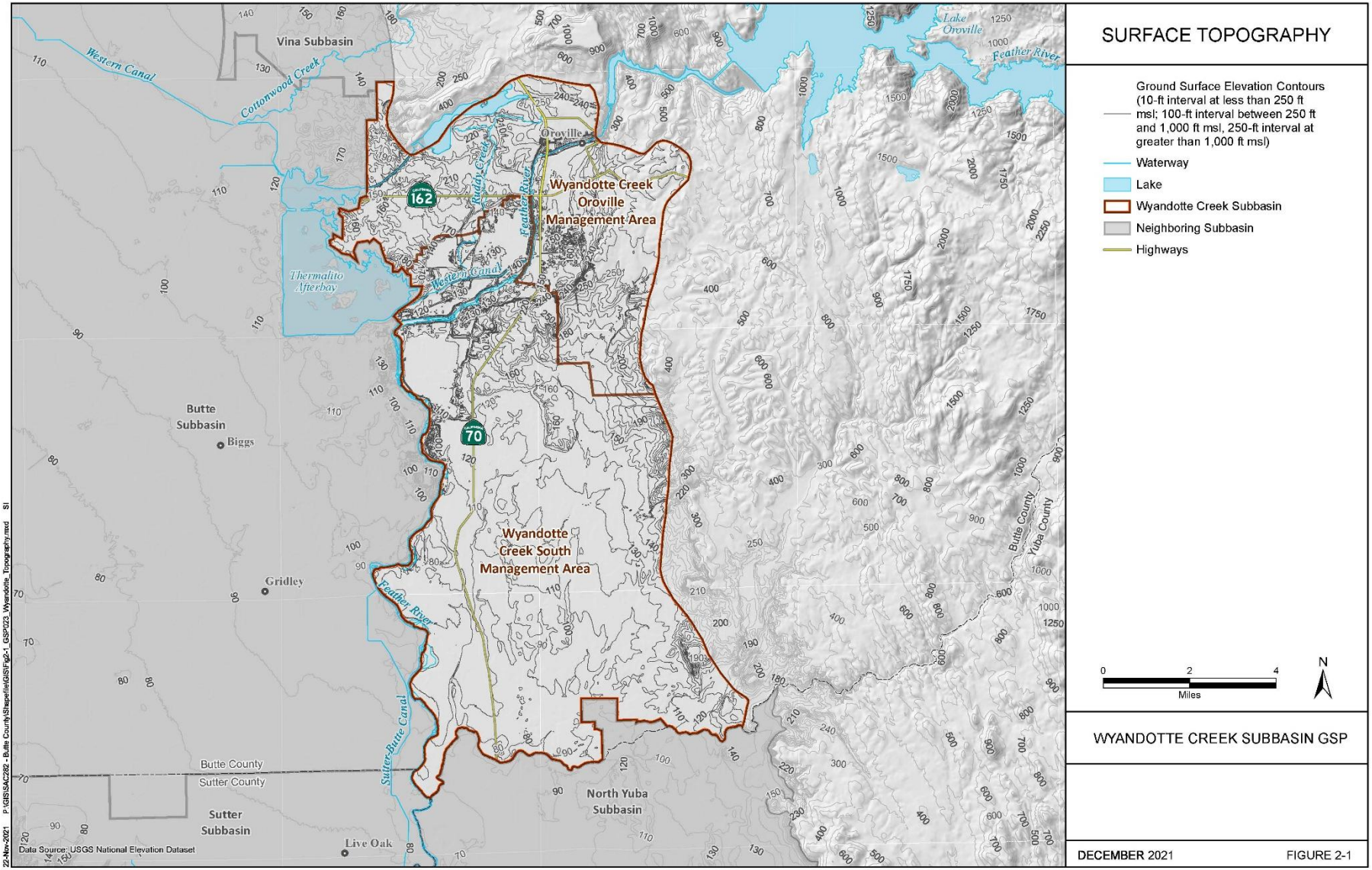


Figure 2-1: Surface Topography of the Wyandotte Creek Subbasin

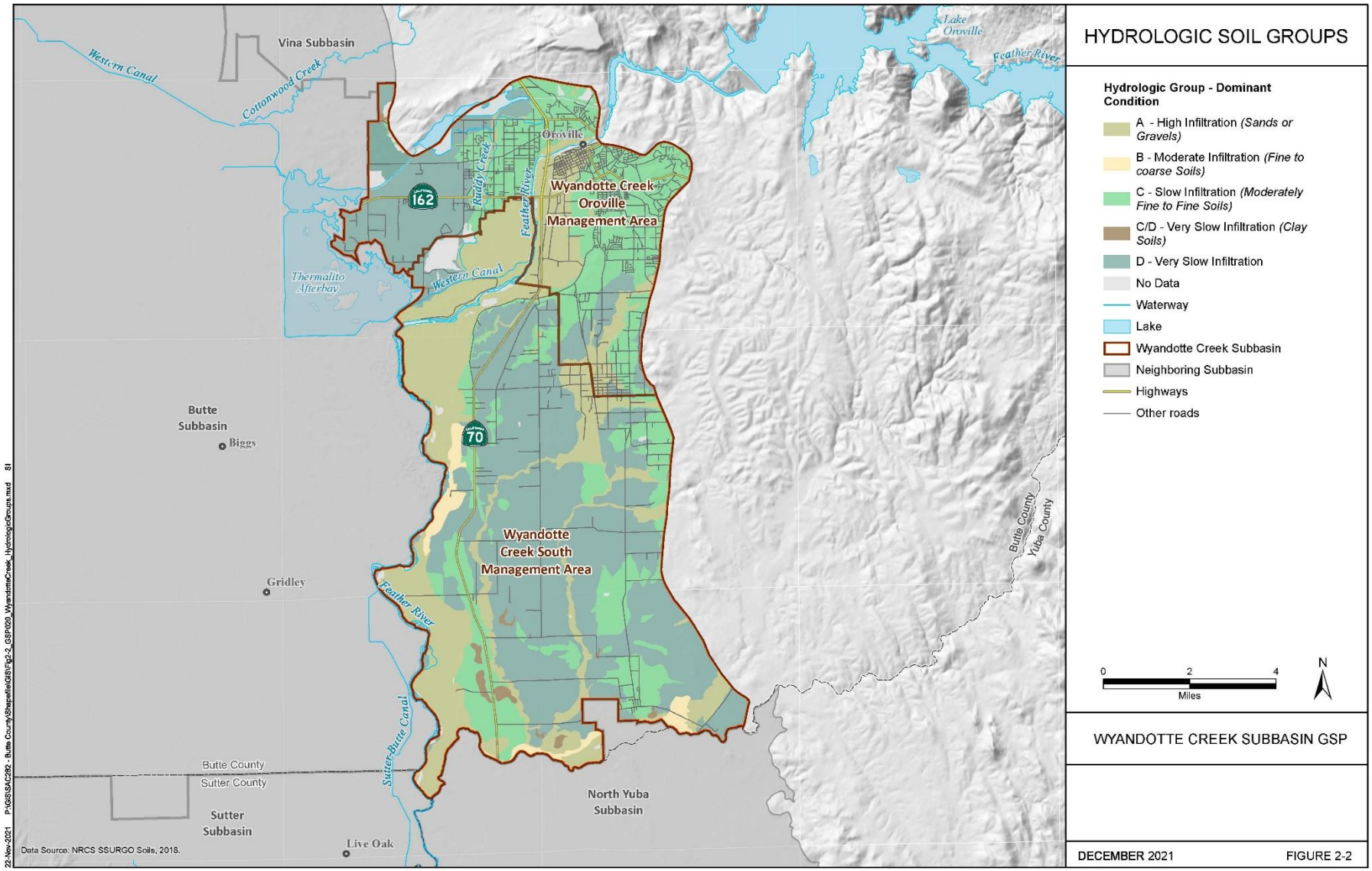


Figure 2-2: Hydrologic Soil Groups

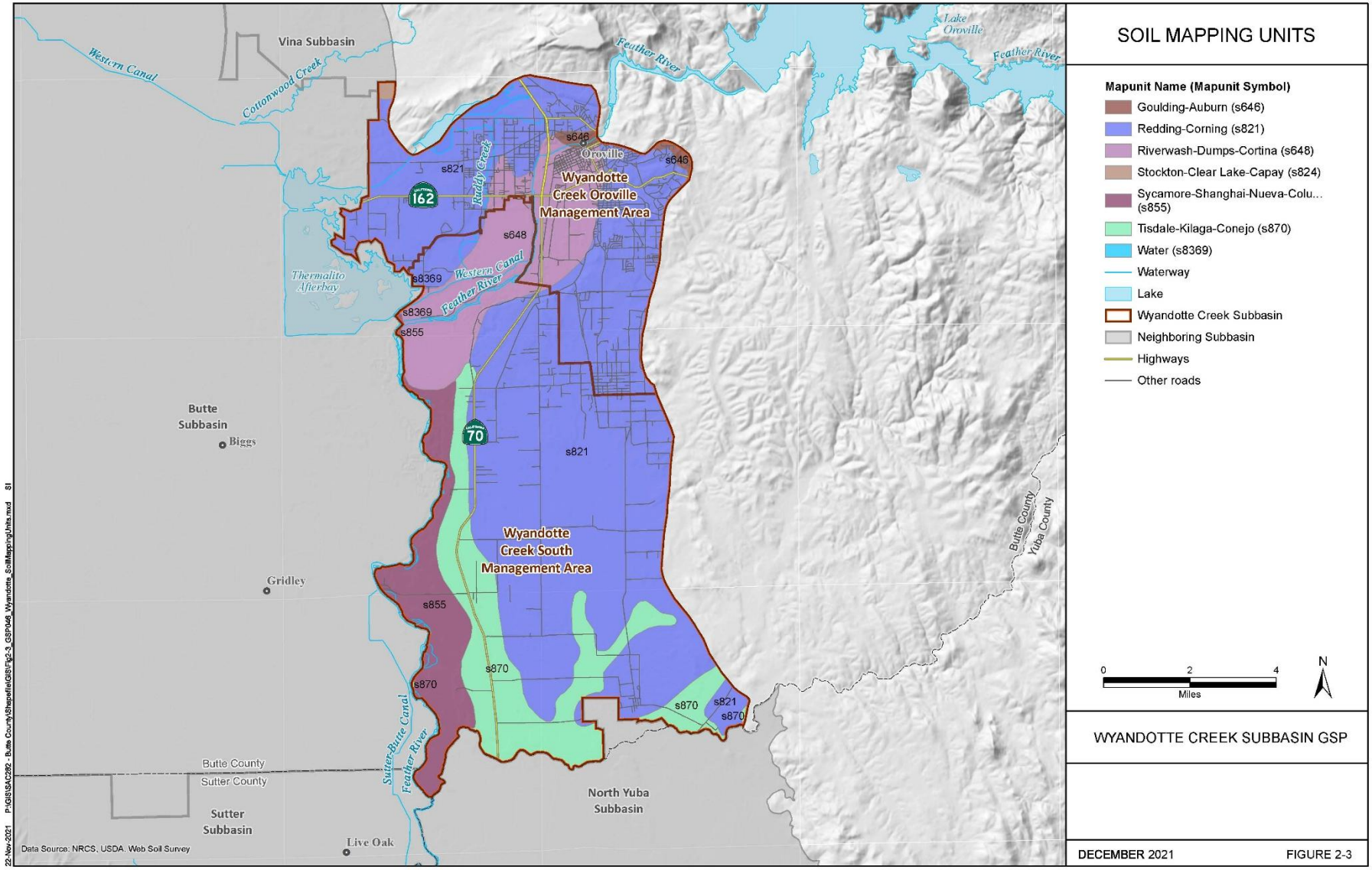


Figure 2-3: Soil Mapping Units

2.1.2.3 Surface Water

The Feather River enters the subbasin in the northeast and then borders the subbasin on its western side. Other large surface water bodies bordering the subbasin include components of the Oroville Reservoir Complex including the Forebay and Thermalito Afterbay. The North, Middle, West and South Forks of the Feather River originate outside the subbasin and together supply water to Lake Oroville with a portion of flow routed through the Thermalito Forebay and Afterbay facilities to generate hydropower and deliver irrigation water supply to the Butte Subbasin, with the remaining water returning to the Feather River. The Feather River serves as a source of municipal and irrigation supply in the subbasin through diversions by the TWSD and SFWPA.

Smaller local or ephemeral streams entering and traversing the subbasin include North Honcut Creek, Wyandotte Creek, Wyman Ravine, Ruddy Creek, canals, and numerous unnamed waterways. Figure 2-4 shows prominent surface water features in the Wyandotte Creek Subbasin.

2.1.2.4 Groundwater Recharge Areas

Groundwater recharge is the downward movement of water from the surface to the groundwater system. Several water sources and mechanisms recharge the groundwater system in the Wyandotte Creek Subbasin. This includes percolation of water from rainfall, irrigation, or water bodies like the Feather River, streams and canals.

Figure 2-5 shows the relative rates of recharge as estimated by the Butte Basin Groundwater Model (BBGM v. 1.0) for the 2018 water year across the model elements (triangular areas) (BCDWRC, 2021). The model has been updated, but 2018 rates can still be considered representative for the subbasin. This is included as an indication of the variation in recharge in different areas due to the cumulative effects of varying factors including: soil characteristics, land use and irrigation water source, and precipitation. Areas with higher rates of recharge correspond in part to areas with soils having higher infiltration rates and areas receiving applied water for irrigation.

There is potential for additional recharge through management activities of flood flows or irrigation practices in the Wyandotte Creek Subbasin. The Soil Agricultural Groundwater Banking Index (SAGBI) is a suitability index for groundwater recharge on agricultural land based on five major factors: deep percolation, root zone residence time, topography, chemical limitations, and soil surface condition. This dataset can serve as a starting point indication for areas conducive to natural or managed recharge. Large portions of the subbasin in its southern half received a moderately good to excellent rating in terms of being suitable for recharge (Figure 2-6). Additional considerations will be important for specific evaluation of any proposed recharge project. SAGBI data can be accessed at https:\\casoilresource.lawr.ucdavis.edu/sagbi.

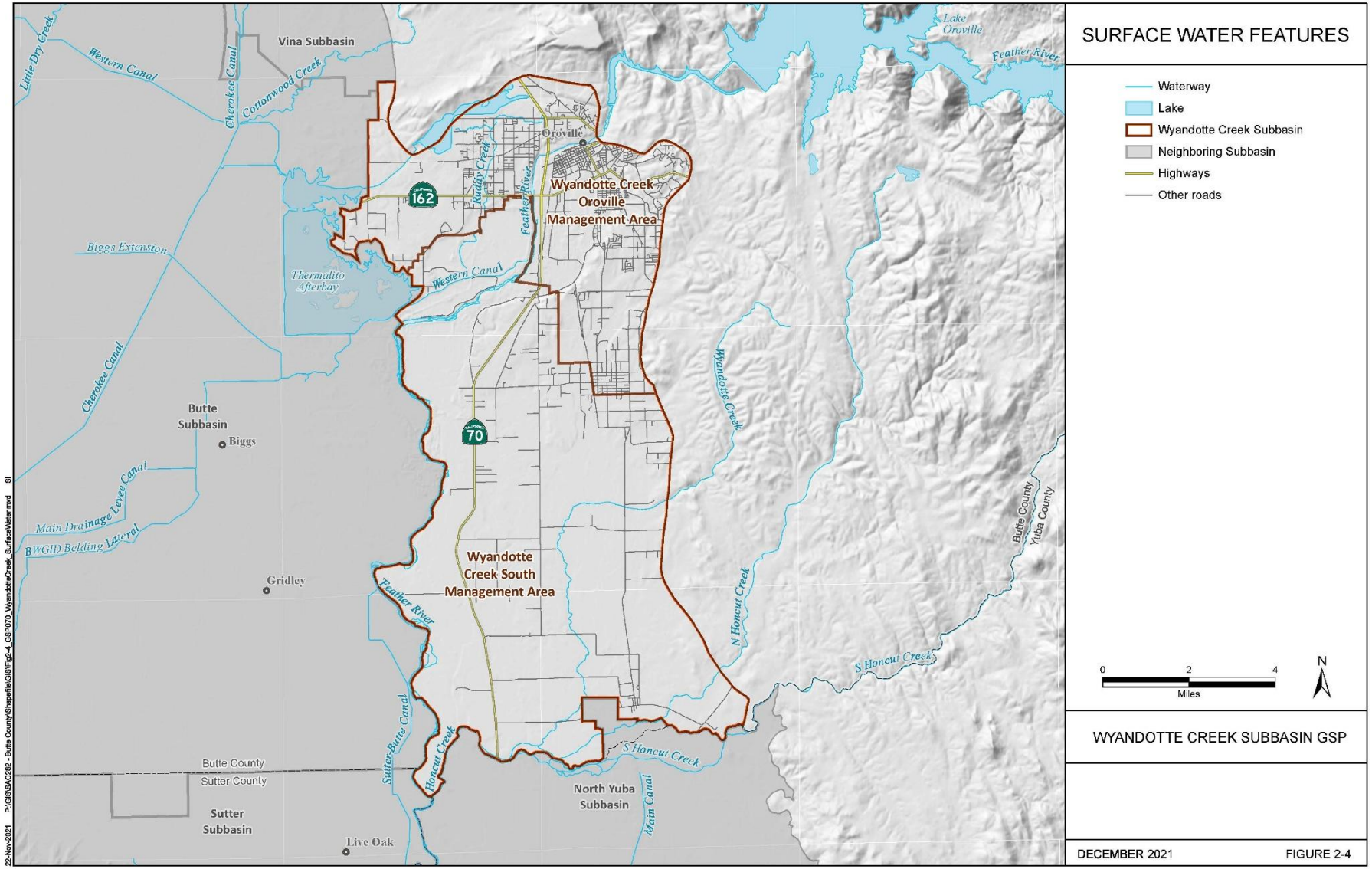


Figure 2-4: Surface Water Features in the Wyandotte Creek Subbasin

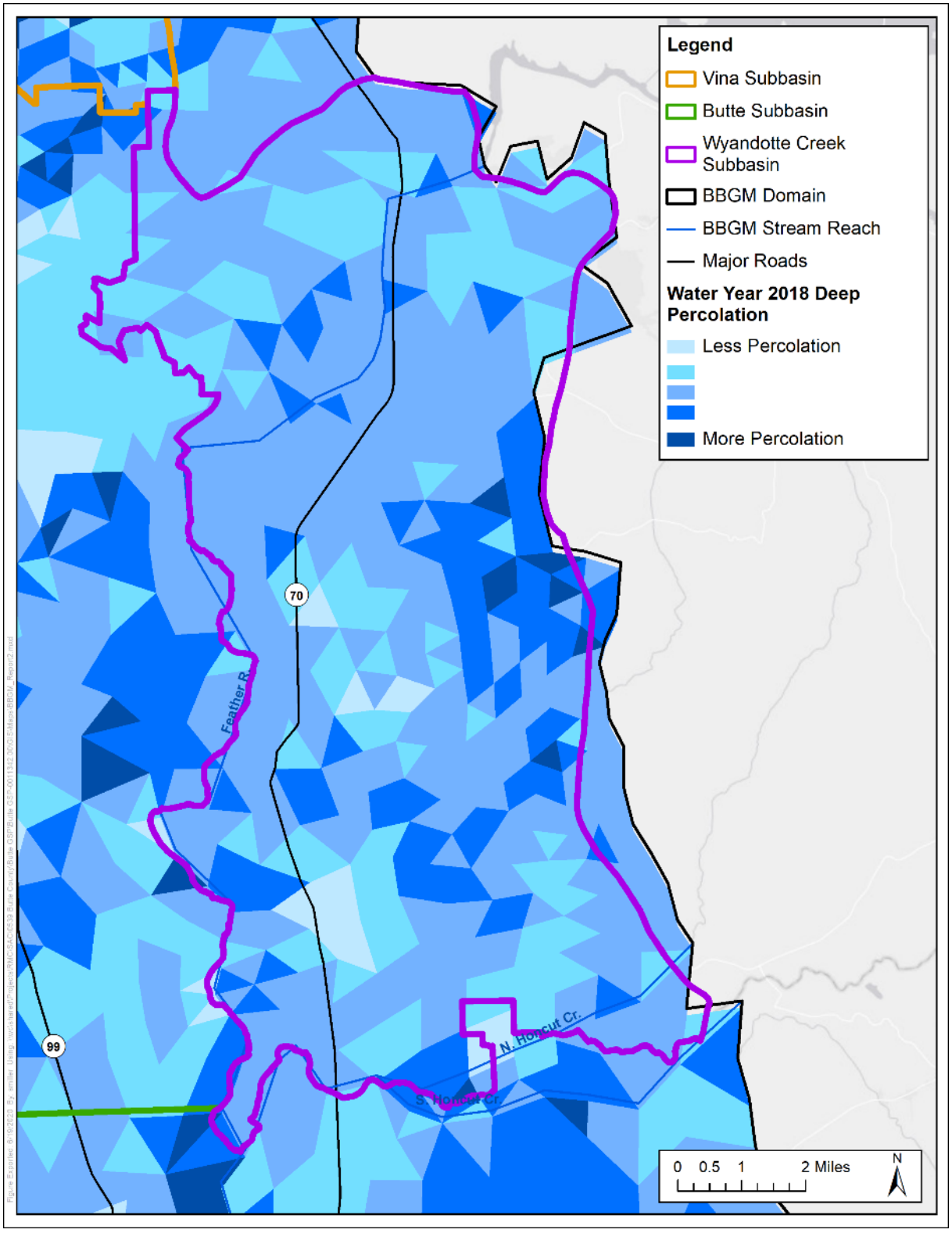


Figure 2-5: Relative Rates of Deep Percolation throughout the Wyandotte Creek Subbasin as Estimated by the Butte Basin Groundwater Model (BBGM v.1.0)

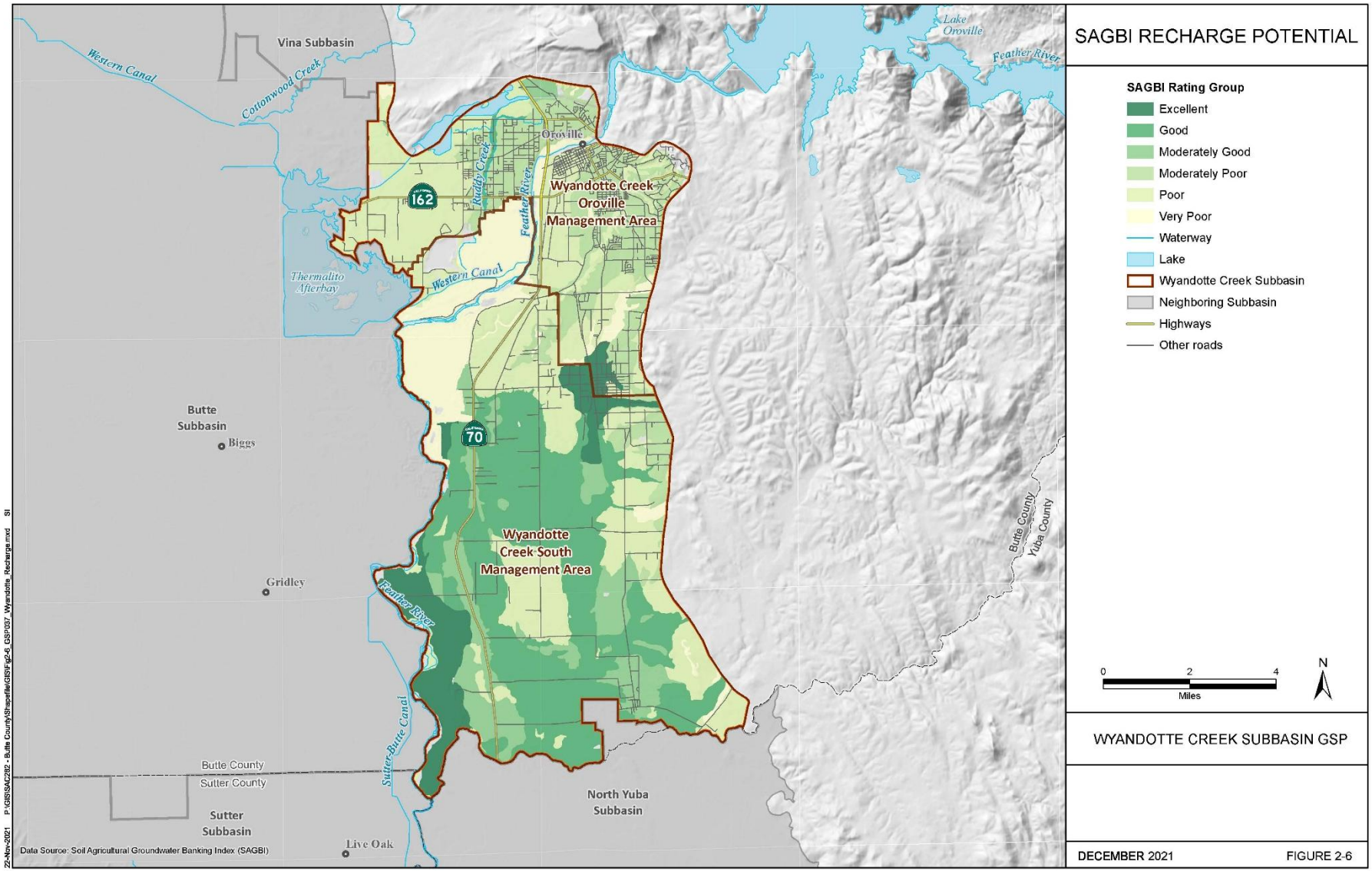


Figure 2-6: Soil Agricultural Groundwater Banking Index Recharge Potential

2.1.3 Regional Geologic and Structural Setting

An inconsistent stratigraphic nomenclature has been established for the Cenozoic deposits in the Wyandotte Creek Subbasin (Blair et al., 1991). Many of these units are defined on the basis of gold content, buried soils, and geomorphic relationships or by the introduction of distant formation names without local verification. The stratigraphy of the Wyandotte Creek Subbasin, despite being finely divided, is further complicated by a lack of continuous exposure and by the fact that many of the units have inset relationships with older formations rather than superposed, layered relationships, owing to the sedimentologic behavior of the Feather River system. Using the nomenclature developed by Blair et al. (1991) and by adhering to the stratigraphic code (North American Commission on Stratigraphic Nomenclature, 2005), three formal stratigraphic units have been differentiated in the subbasin. These include, in ascending order, the Ione Formation, Mehrten Formation (designated by others as the Tuscan Formation), and Laguna Formation (designated by others as a combination of the Alluvium, Modesto, and Riverbank Formations).

In the Oroville area, bedrock has been encountered as shallow as 283 feet below ground surface (bgs) and has been observed in outcrop adjacent to the Memorial Park Cemetery (Dames and Moore, 1994). Moving east from these areas, bedrock has been reported to occur at depths greater than 1,000 feet.

The regional structure of the Sacramento Valley groundwater basin consists of an asymmetrical trough tilting to the southwest with a steeply dipping western limb and a gently dipping eastern limb (Page, 1986). Older granitic and metamorphic rocks underlie the valley forming the basement bedrock on which younger marine and continentally derived sediments and volcanic rock have been deposited. Along the valley axis and west of the present-day Sacramento River, basement rock is at considerable depth, ranging from 12,000 to 19,000 feet bgs. Overlying marine and continentally derived sediments have been deposited almost continuously from the Late Jurassic period to the present. Of these deposits, older sediments in the basin were emplaced in a marine environment and usually contain saline or brackish groundwater. Younger sediments were deposited under continental conditions and generally contain fresh groundwater. Sediments thin near the margins of the basin, exposing older metamorphic and granitic rocks underlying and bounding the Sacramento Valley sediments (DWR, 2005).

2.1.4 Geologic Formations

Groundwater occurs under both unconfined and confined conditions. Unconfined conditions are generally present in the surficial Quaternary deposits and in the Pliocene deposits that are exposed at the surface. Confined conditions exist where one or more confining layers rests above the underlying aquifer deposits.

Figure 2-7 is the Surficial Geologic Map for the Wyandotte Creek Subbasin, produced by DWR, which shows the surface distribution of geologic units. The surface geology is composed of the Laguna Formation in the north and eastern area, alluvium along the Feather River and predominantly Riverbank and Modesto Formations in the southern half of the subbasin. Tailings are mapped along the Feather River where it traverses the subbasin. These surficial deposits together are referred to as the Laguna Formation using the nomenclature of Blair et al. (1991).

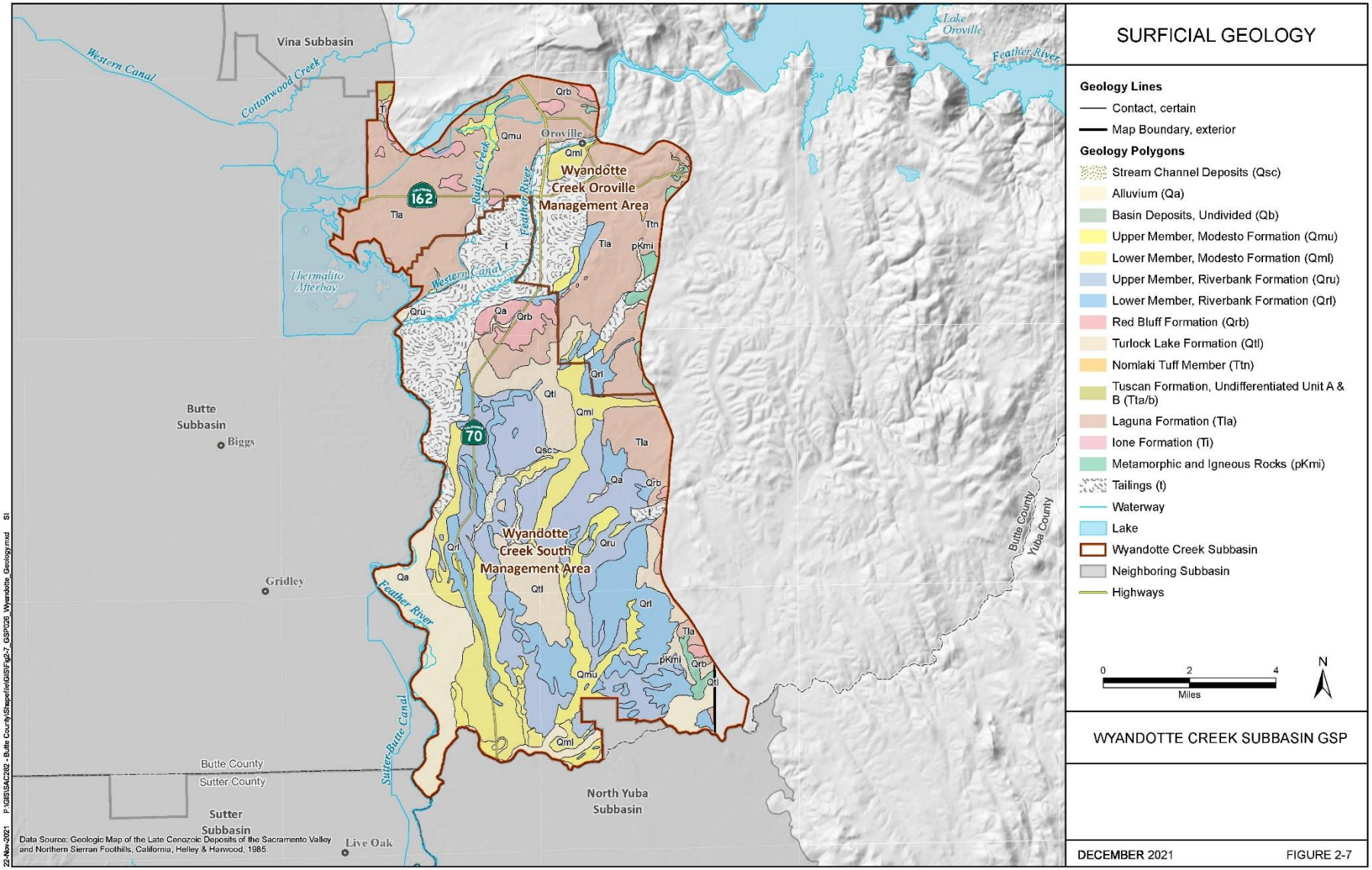


Figure 2-7: Surficial Geology of the Wyandotte Creek Subbasin

The following is a discussion of groundwater producing geologic units found within the subbasin and region.

2.1.5 Groundwater Producing Formations

The majority of groundwater resources in the subbasin exist in spaces between gravel, sand, and clay particles of various formations that store and transmit water in the aquifer systems. Principal water bearing formations in the Wyandotte Creek Subbasin include the Ione, Mehrten, and Laguna Formations. These formations are discussed below.

2.1.5.1 Ione Formation

The Ione Formation is discontinuously exposed on the east side of the Sacramento Valley from near Deer Creek north of Chico to around Friant in the San Joaquin Valley (Creely, 1965 as cited in DWR, 2014). It is present in the subsurface in the Wyandotte Creek Subbasin and extends to the west toward the axis of the northern Sacramento Valley.

The Ione Formation consists of variably cemented, fine to coarse sandstone, siltstone, lignite, and claystone with variegated colors including red, yellow, white, blue, gray, orange, and black. Interbedded lenticular pebble-and-cobble "auriferous" or "greenstone" gravels are locally present and become more abundant eastwardly (Blair et al., 1991). In drill cuttings, the Ione Formation is easily identified from the overlying Mehrten Formation by its multicolored nature and volcanic-free composition.

2.1.5.2 Mehrten Formation

The Mehrten Formation includes a sequence of variably cemented, interbedded clay, sand, and gravel. This formation consists predominantly of purple volcanic debris flow deposits and interbedded water-lain fluvial deposits rich in volcanic detritus, but in many areas containing crystalline basement-derived clasts and rare tuff beds. The base of the Laguna Formation can easily be distinguished in drill cuttings where pumiceous materials of the tuff members are encountered. The reported occurrence of both channel-lain, clast supported, pebble- and cobble-gravel facies and interbedded volcanic-rich debris-flow facies in this formation suggests that debris flows related to volcanic events episodically choked the ancestral stream/river systems of the area. Blair et al. (1991) described the gravel and sand fractions, as well as many intervals of the Mehrten Formation in the Oroville area encountered in the subsurface consisting of porphyritic-dacite rock fragments and disaggregated quartz and plagioclase phenocrysts. The sand fraction of this area comprised a mixture of porphyritic-dacite rock fragments (36% to 37%), granitic rock fragments (32% to 49%), metamorphic rock fragments (4% to 7%), Quartz (10% to 19%), and feldspar (0% to 3%). This composition indicates that in the Wyandotte Creek Subbasin that the Mehrten Formation originated from the erosion of both Sierra Nevada crystalline rocks and a Mount Lassen-derived volcanic sequence.

2.1.5.3 Laguna Formation

The Laguna Formation consists of sandy gravel channel, sandy channel facies, and sandy clay to clay floodplain facies and ranges in thickness in the northern part of the subbasin from 120 feet to 220 feet. The gravel deposits occur above sharp, scoured facies and are comprised of poorly to moderately sorted, sandy, clast-supported pebbles and cobbles. In the Oroville area, the Nomlaki Tuff Member, a white, pumice-rich, water-lain vitric tuff has been placed at the base of the Laguna Formation (Blair et al., 1991). If encountered, directly underlying this member is the Mehrten Formation. Where the Nomlaki Tuff Member is not encountered, the base of the Laguna

Formation is identified by the presence of gravel clasts and/or sand grains consisting of a composition greater than 50% andesite, andesitic basalt, and/or dacite.

The Laguna Formation was deposited by the ancestral Feather, and outside the subbasin by the Yuba, Bear, and American rivers to the south (Helley and Harwood, 1985). During the Pliocene and Pleistocene epochs, uplift of the Sierra Nevada increased the erosion of the plutonic and metamorphic rocks on the eastern side of the valley. Rivers and streams carried the eroded material westward to the valley floor, and as the water overtopped the banks, it spread out across the broad floodplains of the valley, depositing the sediments into broad alluvial fans (DWR, 2014).

2.1.6 Geologic Cross Sections

Figure 2-8A shows Airborne Electromagnetic (AEM) data profiles from the Department of Water Resources (DWR) W07 survey. It is a key which shows the orientation of geologic cross sections developed for the Wyandotte Creek Subbasin. Figure 2-8B is the north-south geologic cross sections (labeled A-A' on the map) for the Wyandotte Creek Subbasin, developed for this amended GSP. The cross-section shows three different stratigraphic units, from oldest to youngest: Ione Formation, Mehrten Formation (including the Nomlaki Tuff), and the Laguna Formation. The Laguna Formation is representative of the shallow (or upper) aquifer zone and the Ione Formation is considered the deeper aquifer zone.

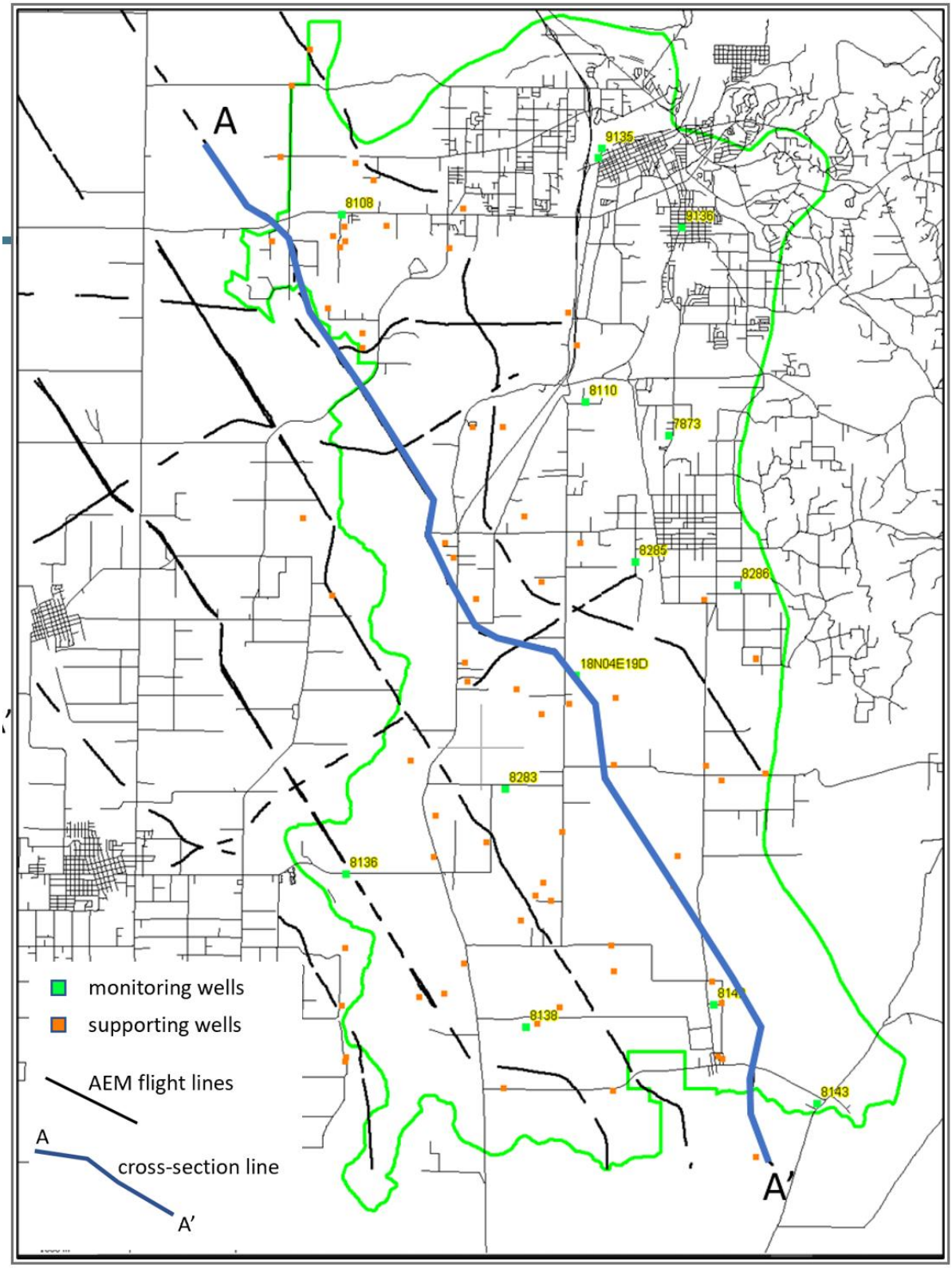


Figure 2-8A. Wyandotte Creek Subbasin AEM Flightlines

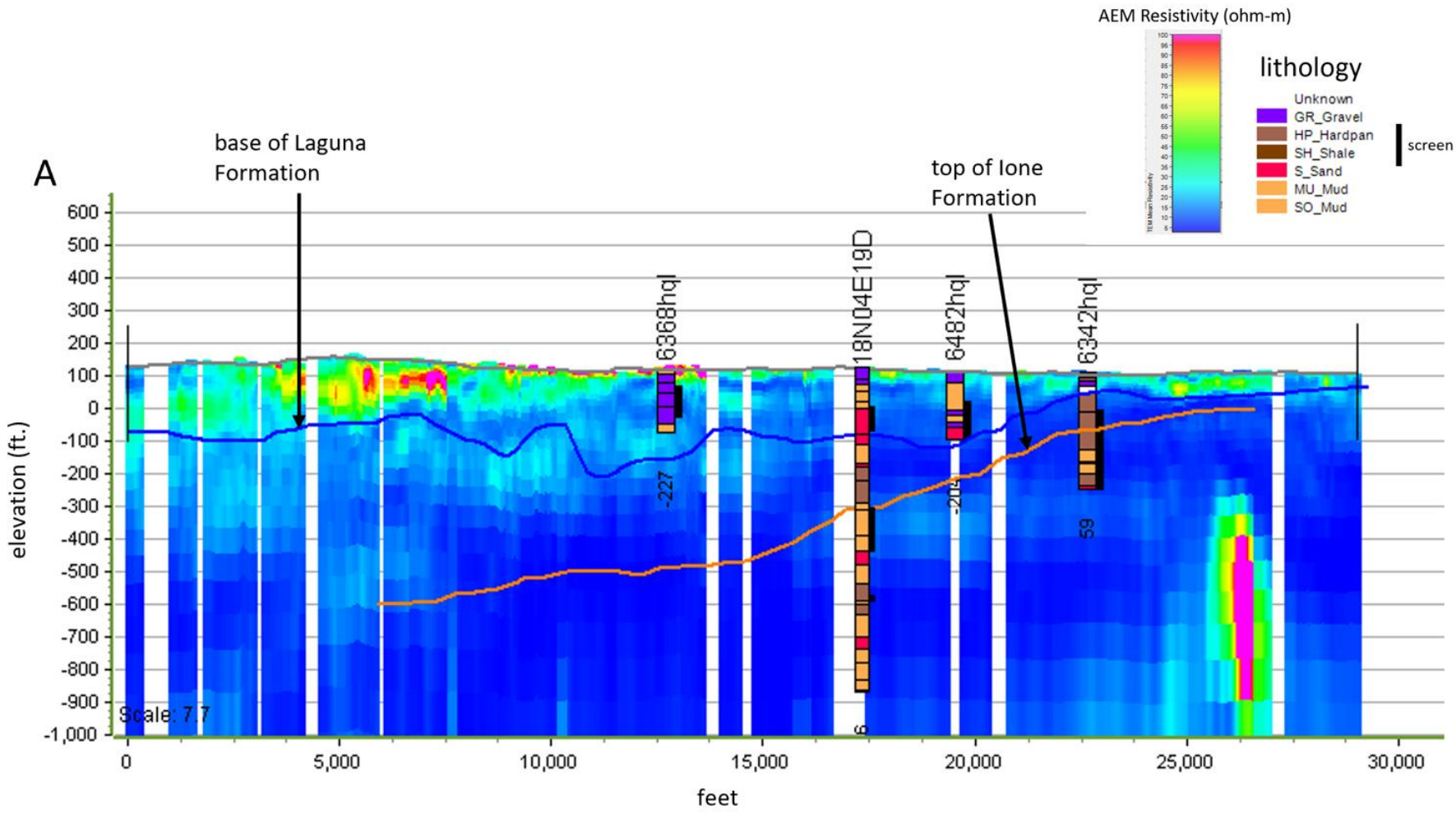


Figure 2-8B: Wyandotte Creek Subbasin Groundwater Aquifer Representative Cross-Section from DWR's AEM Survey.

2.1.7 Principal Aquifers and Aquitards

DWR defines principal aquifers under SGMA as the "aquifers or aquifer systems that store, transmit, and yield significant or economic quantities of groundwater to wells, springs, or surface water systems" (California Code of Regulations [CCR], Title 23, § 351(aa)). A single principal aquifer in the subbasin consists predominantly of Ione, Mehrten, and Laguna Formations. There are no known structural properties that significantly restrict groundwater flow within the subbasin within the portion of the aquifer that stores, transmits, and yields significant quantities of water.

2.1.7.1 Primary Uses

Water produced from the principal aquifer is primarily used to meet irrigation, domestic and municipal water demand. Domestic supply is used to meet rural residential demands. Municipal supply is largely used to meet demand from the City of Oroville.

2.1.7.2 Specific Yield

Specific Yield or storativity quantifies the ability of the aquifer to hold or store water. Quantitative water-bearing data for the Laguna Formation is limited, especially in the area of the Wyandotte Creek Subbasin. Although the occurrence of thin sand and gravel zones is common, many of them have reduced permeability due to cementation. This, coupled with its fine-grained character, leads to an overall low permeability for the Laguna Formation. An unpublished study by Bookman-Edmonston Engineering, Inc. (1992) estimated groundwater storage based on an average specific yield of 6.9% and assumed thickness of 200 feet (DWR, 2006). The 2005 DWR report assumed a specific yield of 8.8%. Values for specific yield and storativity used in the calibrated BBGM v.1.0 throughout the Wyandotte Creek Subbasin are 10% and 0.00001, respectively (BCDWRC, 2021). Specific Yield will be refined as additional information becomes available.

2.1.7.3 Transmissivity

Transmissivity (T) quantifies the ability of water to move through aquifer materials. The aquifer hydraulic conductivity (K) quantifies the rate of groundwater flow and is related to the transmissivity and aquifer thickness (b) by the following formula: $T = K \times b$. Limited hydraulic conductivity data is available for the subbasin. The BBGM calibrated hydraulic conductivity ranges from 20-250 feet per day depending upon the location and depth within the subbasin (BCDWRC, 2021).

2.1.8 Opportunities for Hydrogeologic Conceptual Model Improvements

2.1.8.1 Identify Areas Where Additional Monitoring Would Help Increase Understanding of the Aquifer

Determine the best approach for increasing monitoring in these areas, such as installation of new wells or increased monitoring at existing wells.

2.1.8.2 Expand Isotopic Analysis to Further Assess Groundwater Recharge

Future recharge and aquifer studies should include the collection and interpretation of stable isotope data. Methodology considerations include: 1) Seasonal sampling should be performed as part of future surface water and groundwater isotope studies for purposes of assessing groundwater recharge; 2) Monitoring wells with multiple screened intervals (multi-completion monitoring wells) are recommended to assess stable isotope data at different depths. Sampling locations with a single well-screen interval do not provide nearly as much insight as sampling locations with wells screened at multiple depths; and 3) Monitoring wells with relatively short screened zones (20 feet or less) are preferred to minimize mixing between aquifer zones or between aquifer zones and residual water retained within the aquitard zones between aquifers.

2.1.8.3 Characterize Recharge Source With General Water Quality

Conduct general mineral analysis on groundwater samples to evaluate whether elevated specific conductivity values observed during sampling are due to irrigation influences (e.g., elevated nitrate, calcium, sulfate) or due to proximity to the Ione Formation (e.g., elevated sodium, chloride, and boron).

2.1.8.4 Recharge rate

Most monitoring well locations and depths should be sampled and analyzed for presence of tritium to help distinguish whether recharge to individual aquifer zones is occurring over periods shorter than about 60 years, or whether recharge is occurring over longer timeframes.

2.1.8.5 Field Testing and Monitoring Equipment Installation to Understand the Recharge Rates and Stream Losses in the Recharge Zone

Expansion of stream gauging locations to document changes in stream-aquifer interactions should be conducted. In addition to the stream gauging, a series of shallow dedicated monitoring wells with temperature sensors installed along stream courses in the recharge corridor may help identify what sections of streams are losing or gaining.

2.2 Groundwater Conditions

2.2.1 Description of Current and Historical Conditions

Groundwater conditions in the Wyandotte Creek Subbasin are continually monitored and are comprehensively described in the 2001 and 2016 Water Resource Inventory and Analysis Reports and Annual Groundwater Status reports produced by Butte County. These documents and other reports portray a subbasin that has adequate groundwater resources to meet demands under most hydrologic conditions. However, comparison of the reports illustrates how in the period between their issuance demand for groundwater has grown relative to the available supply. This trend, quantified below in the water budget section of this document, suggests that as forces ranging from population growth to climate change play out, the value of well-informed water management policies and practices is likely to increase. In short, as shown below, while

groundwater conditions in the subbasin remain relatively stable, maintaining this posture in the future may become less the result of a state of nature and more the reward for thoughtful management. The water budget analysis presented in this section provides a quantitative assessment of how conditions have changed in the Wyandotte Creek Subbasin at the time of GSP development and an indication of how conditions may change in the future. The GSA will provide updated groundwater condition assessments in GSP Annual Reports and Five-Year Periodic Evaluations.

2.2.2 Groundwater Trends

2.2.2.1 Elevation and Flow Directions

Figures 2-9 and 2-10 show groundwater elevation contours in the Wyandotte Creek Subbasin for the spring and fall of 2015 and Figures 2-11 and 2-12 show elevation contours for the spring and fall of 2019.

Contours plotted on these maps show first encountered groundwater as reported through the CASGEM Program. The data were processed as follows:

- Data from CASGEM were used to identify wells in the Wyandotte Creek Subbasin plus supplemental sites used to extend the contours to the west.
- Water level readings for 2015 and 2019 were then filtered for measurements taken between September 20th and October 30th for the fall contours and between March 20th and April 30th for the spring contours.
- Wells showing depths to first encountered groundwater deeper than 500 feet were eliminated from the data set. The remaining readings were sorted by well depth.

The four contour maps display groundwater elevations that are higher in the north of the subbasin than in the south indicating a general gradient that causes water to flow from north and from foothill recharge areas in the east toward the subbasin's southeastern corner. Because of the influence of Thermalito Afterbay and the Feather River, groundwater elevations in the north are generally stable between the spring and fall observation periods, while elevations in the south tend to be lower in the fall than the spring, a pattern typical of valley floor locations distant from major sources of recharge.

When comparing elevations reported in 2015 with those reported in 2019, the influence of stable water elevations in Thermalito Afterbay has resulted in a corresponding stability in neighboring groundwater elevations. However, elevations in the spring of 2015 observed in the south tend to be higher than those reported for the spring of 2019. Fall elevations in the north continue to show the stabilizing influence of Thermalito Afterbay. However, elevations to the south for 2015 are slightly lower than those observed in 2019. This may be an indication of an increase in the volume of water recharged from upland areas flowing into the subbasin's principal aquifer.

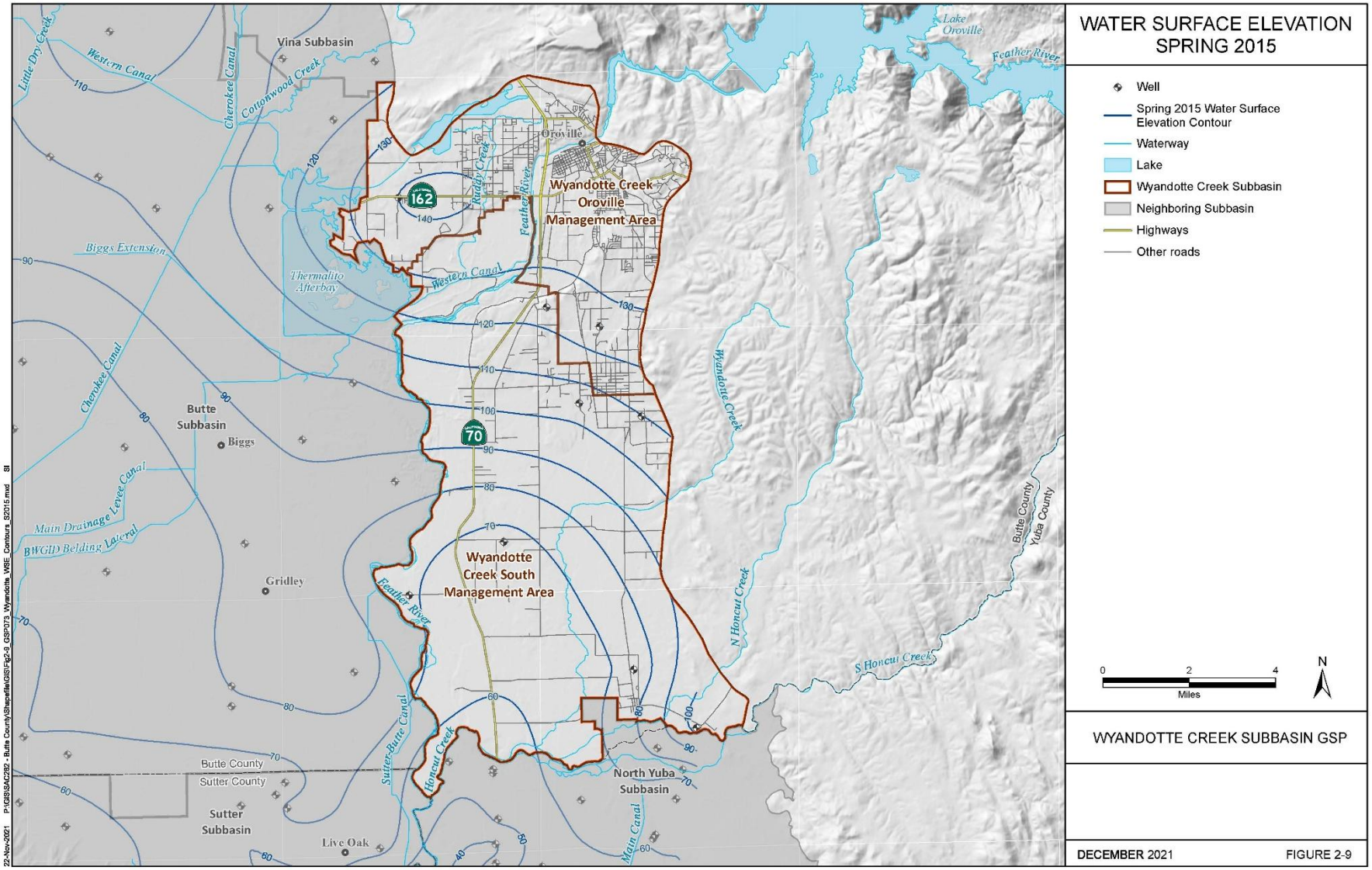


Figure 2-9: Water Surface Elevation Contours (Spring 2015)

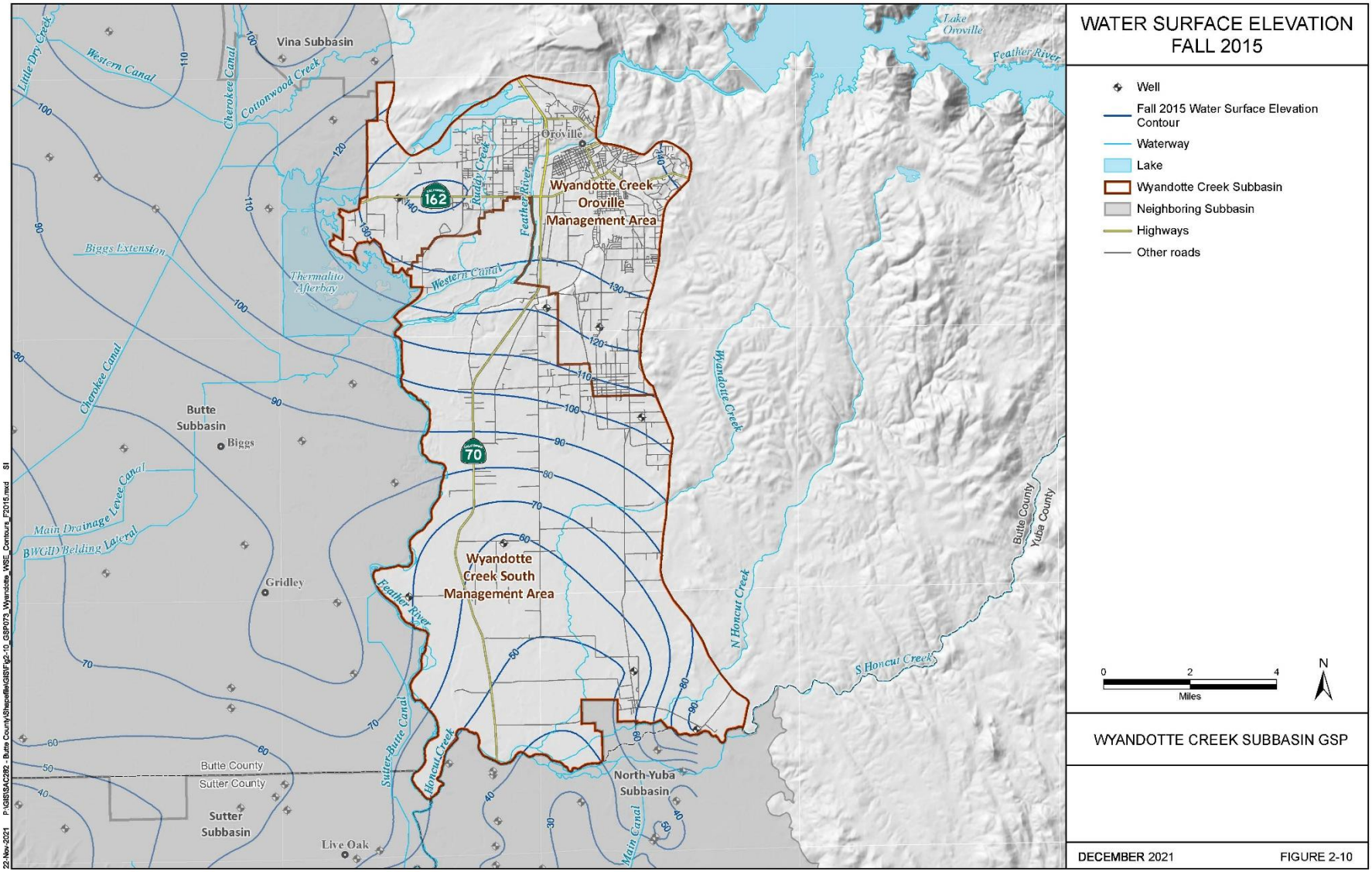


Figure 2-10: Water Surface Elevation Contours (Fall 2015)

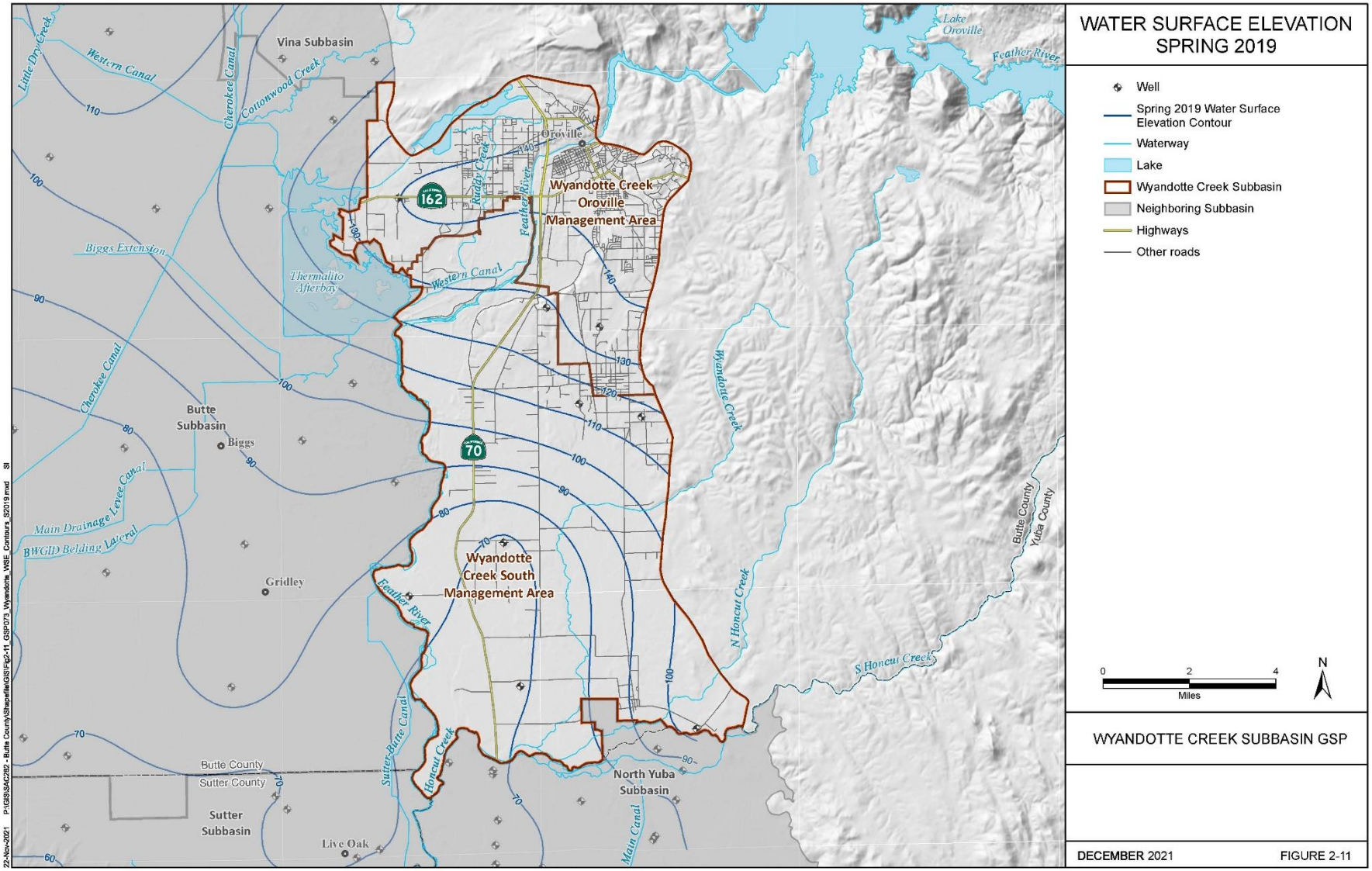


Figure 2-11: Water Surface Elevation Contours (Spring 2019)

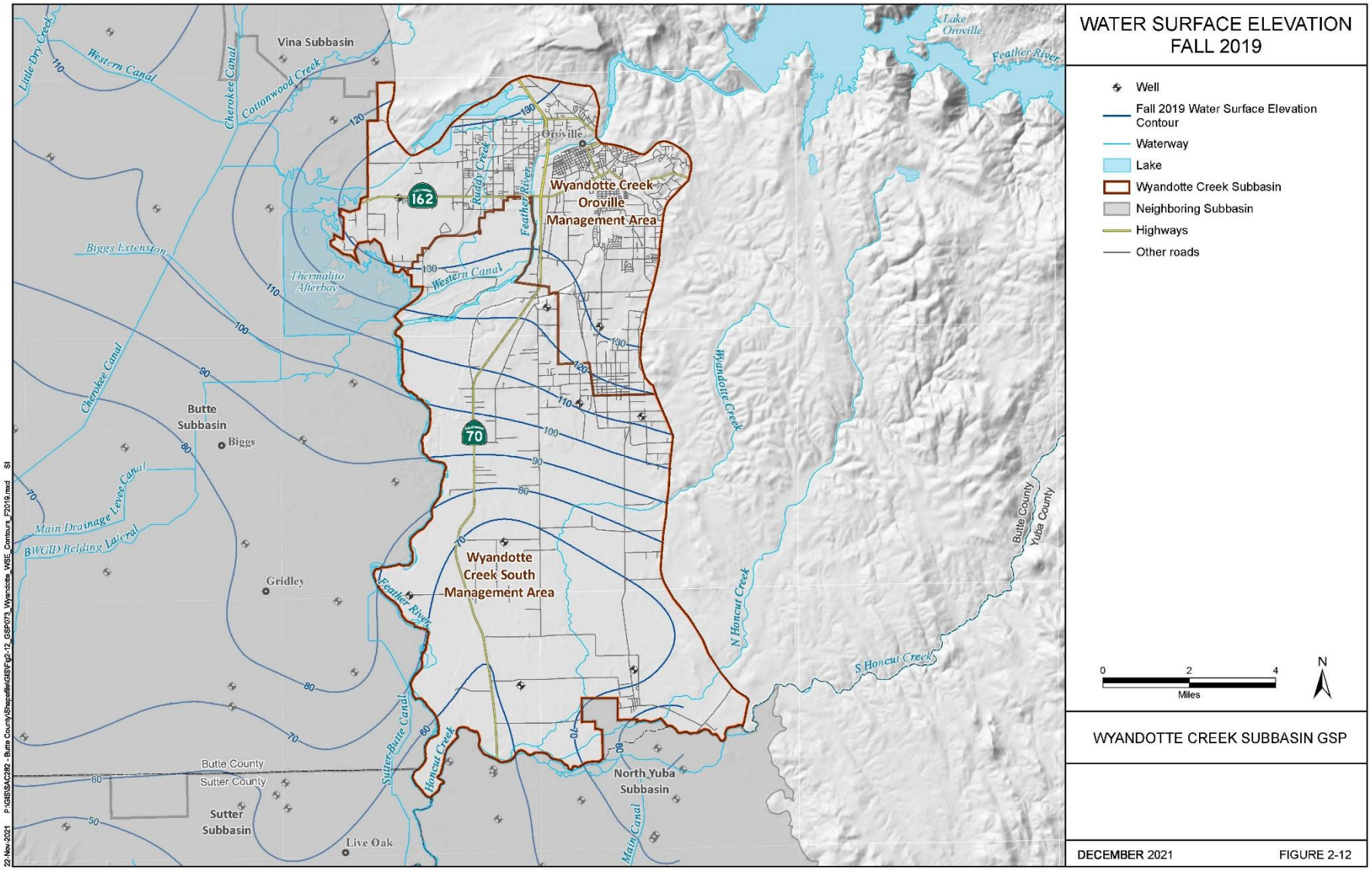


Figure 2-12: Water Surface Elevation Contours (Fall 2019)

2.2.2.2 Lateral/vertical Gradients

Lateral groundwater gradients generally reflect ground surface topography. In the foothills east of the Wyandotte Creek Subbasin the gradient is steep, as high as 60 feet per mile. However, in most of the subbasin itself, the gradient is gradual at approximately 3 feet per mile, with the gradient influenced both by the terrain and by the groundwater mound fed by seepage from Thermalito Afterbay.

Figure 2-13 is a map of the Wyandotte Creek Subbasin's Oroville MA that displays hydrographs of selected monitoring wells, and Figure 2-14 is a similar map of the subbasin's South MA. Just as comparison of the spring and fall contours indicated the shift in groundwater elevations that typically occurs between the seasons, the hydrographs display annual oscillations in elevations as well as trends over the monitoring period, snapshots of which are captured in comparison between the 2015 and 2019 contours. Each of the hydrographs displays water surface elevations in feet amsl and also gives the depth of the bottom of the well which indicates the location of the zone being measured.

All of the hydrographs are taken from single completion wells where only one aquifer zone is screened. As discussed in Chapter 4, as part of the Technical Support Services program (TSS), DWR completed installation of a nested monitoring well (Figure 4-6). However, no water levels were collected from this well for inclusion into the 2022 GSP.

Hydrographs for the selected wells in the Wyandotte Creek Subbasin are similar to the seasonal fluctuations illustrated in the contour maps with depths to groundwater at all locations being shallower in the winter and spring than in the summer and fall. Wells in the vicinity of Oroville tend to have higher groundwater elevations than those to the south and west because of higher ground surface elevations at those locations and because of recharge from the foothills. While wells in the eastern portion of the subbasin show periods when high levels of pumping cause water levels to drop during the summer, groundwater elevations tend to rebound to consistent elevations over the winter.

As would be expected, wells located near major water bodies such as the Thermalito Afterbay and the Feather River display stable groundwater elevations due to their proximity to these features. These hydrographs also display the strong gradient that exists between spring groundwater elevations observed in the northeastern quadrant of the subbasin, where elevations between 140 and 160 feet amsl are typical, and those observed in the southwestern quadrant, where groundwater elevations are near or shallower than 90 feet amsl.

Vertical groundwater gradients are typically measured by comparing groundwater elevations using multi-completion or nested wells that are designed to measure elevations from different aquifer zones. If groundwater levels in the shallower zone are higher than in the deeper ones, the gradient allows downward movement of groundwater. In locations where groundwater levels in the shallower zone are lower than in the deeper zones, the gradient encourages upward movement of groundwater. In locations where groundwater levels are similar in elevation and track each other in fluctuations across two or more zones, there is no vertical gradient and no vertical movement of groundwater. One of the data gaps observed in the Wyandotte Creek Subbasin is the lack of nested monitoring wells needed to observe and interpret vertical groundwater gradients in the subbasin. Installation of shallow wells (with multiple completions) in 2026 funded by the SGM grant program help to address this data gap.

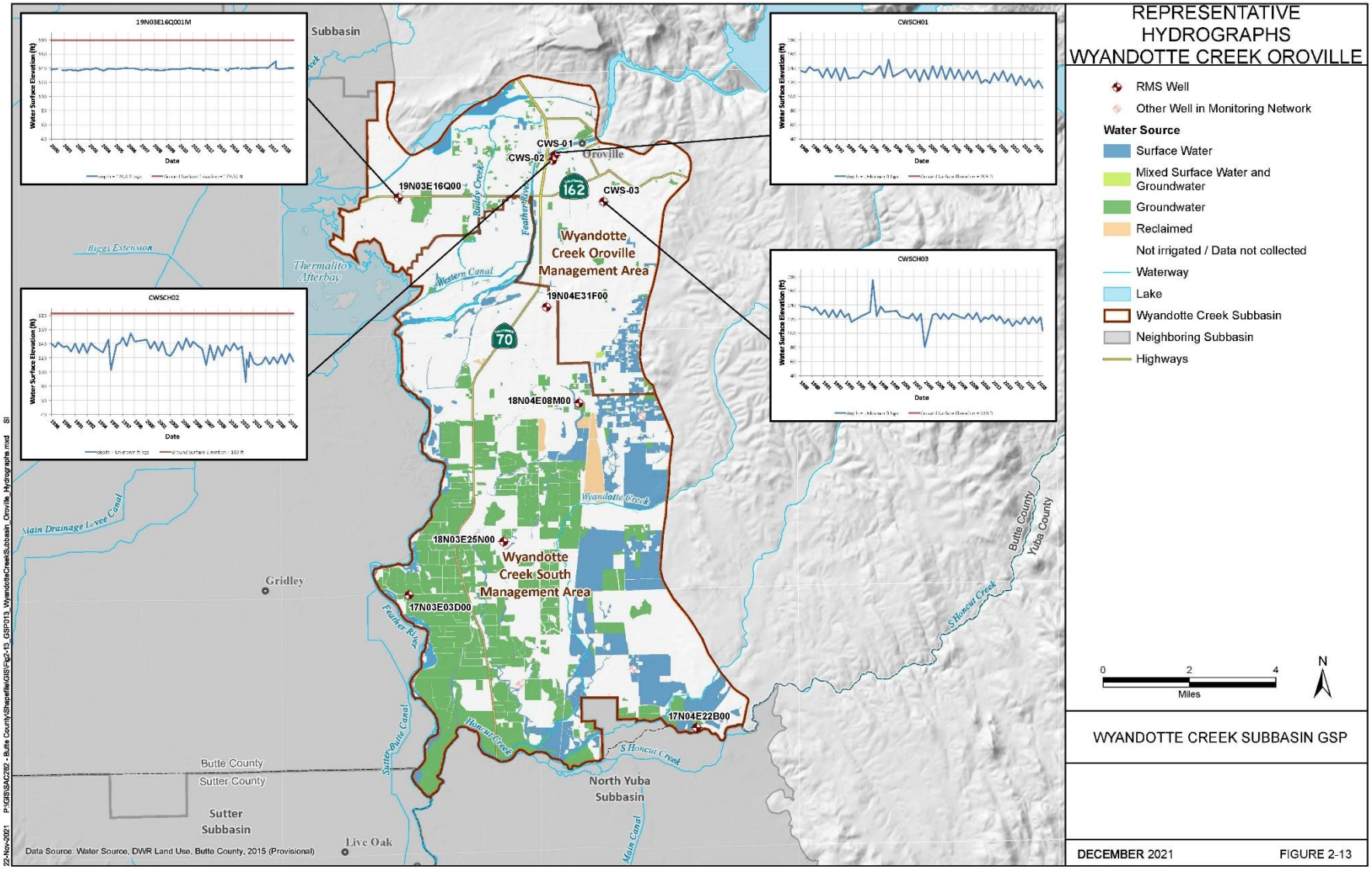


Figure 2-13: Representative Hydrographs (Wyandotte Creek Oroville Management Area)

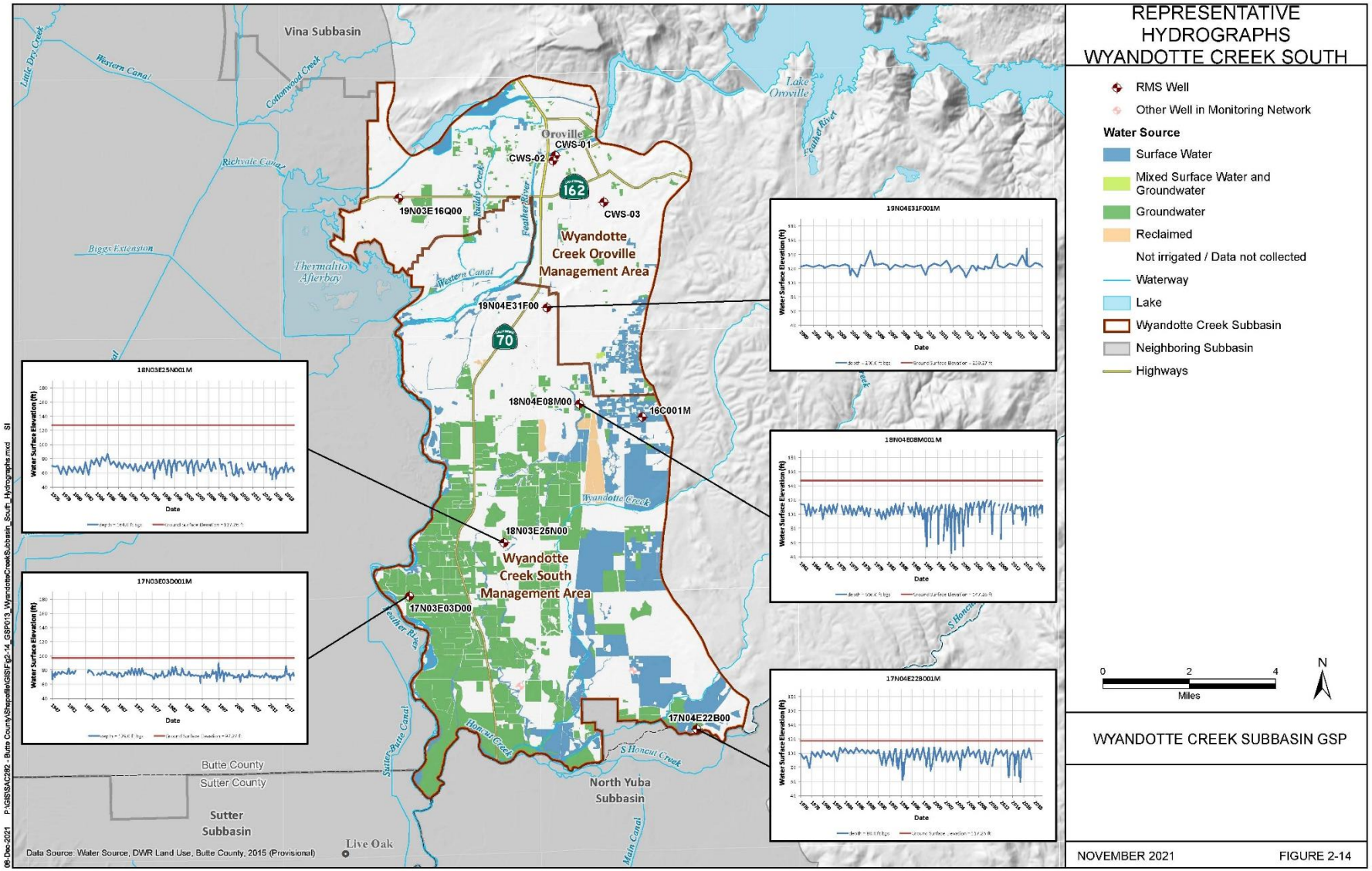


Figure 2-14: Representative Hydrographs (Wyandotte Creek South Management Area)

2.2.2.3 Regional Patterns

The series of contour maps and hydrographs presented above complement each other in showing how groundwater levels respond to seasonal variations in demand and recharge and are affected by long-term events such as the recent drought. The patterns in groundwater conditions observed in the Wyandotte Creek Subbasin resemble those found throughout the region and are driven by similar forces. However, groundwater conditions in the Wyandotte Creek Subbasin tend to be moderated by recharge from precipitation, canal seepage and the proximity of Thermalito Afterbay and the foothills. Although the Wyandotte Creek Subbasin receives little groundwater inflow from the north, the subbasin does contribute groundwater to areas to its south.

2.2.2.4 Change in Storage

Change in groundwater storage is the product of the volume of aquifer material lying between groundwater elevations at the beginning and end of the period over which the change takes place and 'storage' values representing the storage capacity of a unit of aquifer material. The heterogeneity of the lithology of the shallow, unconfined, and confined zones results in a wide range of values for storage: specific yield for unconfined zones and coefficient of storage for confined zones.

Groundwater storage in the Wyandotte Creek Subbasin follows a pattern typical of much of the Sacramento Valley where during normal to wet years, water stored in the aquifer system is withdrawn over the summer when demand is high, and the main pathways for recharge are deep percolation of precipitation and irrigation applications, canal seepage, and seepage from Thermalito Afterbay. As illustrated in the water budget, in many years, reductions in storage during the summer are replenished by precipitation over the winter allowing storage to rebound by the following spring.

Review of the hydrographs from monitoring wells in the Wyandotte Creek Subbasin demonstrates the influence of the Wyandotte Creek Subbasin's location with the foothills to the east, the Feather River to the west and Thermalito Afterbay to the northwest as factors that stabilize both groundwater elevations and groundwater storage. While the Afterbay, canal seepage and the foothills are important sources of recharge, the prevailing groundwater gradients allow groundwater to flow to the river and to subbasins to the south. Outflows to the river and to the south increase when inflows to the Wyandotte Creek Subbasin increase causing gradients to the south and to the river to steepen. The dynamics of the interaction between inflows, outflows, changes in groundwater elevations and changes in storage are captured in the water budget described later in the Basin Setting and by the BBGM.

A graph depicting estimates of the annual and cumulative change in the volume of groundwater in storage between seasonal high groundwater conditions, including the annual groundwater use and water year type based on the Sacramento Valley Water Year Index[5] is provided in Figure 2-15.

The change in groundwater storage is estimated based on the change in measured spring-to-spring groundwater levels at each GWL RMS well, multiplied by the area of a Thiessen polygon surrounding that RMS well (defining a representative area for each RMS well) and a

[5] Additional details describing the Sacramento Valley Water Year Index are available from the California Data Exchange Center (https://cdec.water.ca.gov/reportapp/javareports?name=WSIHIST).

representative storage coefficient of 0.1 for the subbasin. The groundwater pumping is estimated through measurements (agricultural, municipal/industrial), calculations (rural residential), and estimates (municipal/industrial). and is shown on a water year basis.[6]

As indicated in the figure, groundwater storage has generally decreased in dry and critical years and increased in wet years. In above normal and below normal years, changes in storage are smaller and less predictable, with increases in some years and decreases in others. For the recent historical period, which was marked by relatively dry conditions from 2007 to 2016 (with the exception of the wet year of 2011) and 2020-2022, there has generally been a decline in groundwater storage within the subbasin. Historical and projected changes in storage are discussed in greater detail in Section 2.3, Water Budget.

[6] A water year is defined as the period from October 1 of the prior year to September 30 of the current year. For example, water year 2000 refers to the period from October 1, 1999, to September 30, 2000.

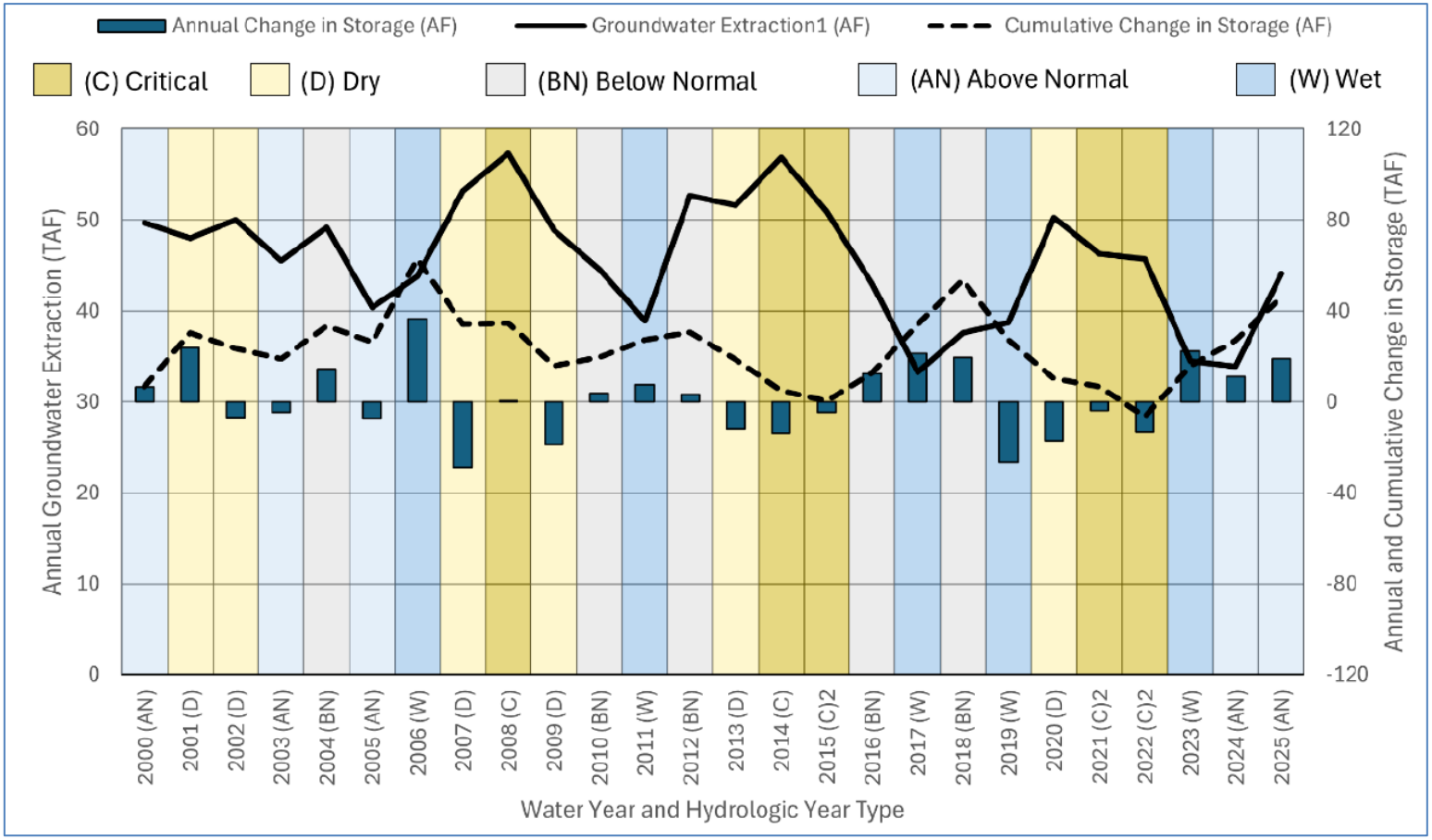


Figure 2-15: Change in Storage and Groundwater Pumping by Water Year Type

Note: TAF = thousand acre-feet

2.2.3 Seawater Intrusion

Intrusion of seawater is not a consideration in the Wyandotte Creek Subbasin because of the subbasin's location. For this reason, no monitoring of seawater intrusion is required nor is there a need for projects and management actions to mitigate seawater intrusion.

2.2.4 Groundwater Quality

2.2.4.1 Current Conditions

The primary water chemistry in the area indicates calcium magnesium bicarbonate or magnesium calcium bicarbonate groundwater. Some magnesium bicarbonate can be found in the northwest portion of the subbasin (DWR, 2006). The generally good water quality characteristics of the subbasin are apparent in the overall salinity of groundwater. In general, total dissolved solids (TDS) concentrations in the study area are below 500 milligrams per liter (mg/L) throughout the subbasin (Bookman-Edmonston Engineering, Inc. 1992). Data collected from DWR water quality wells indicate a TDS range of 149 to 655 mg/L and a median of 277 mg/L (DWR, 2006). Butte County's water quality trend monitoring program measures specific conductance in monitoring wells in the subbasin. Data collected annually from 2002 through 20252025 indicate a range of 132 to 374 microsiemens per centimeter (µS/cm) for most wells, well below the secondary water quality threshold for drinking water of 900 µS/cm. There are a few isolated instances where specific conductance exceeded drinking water standards in the deeper aquifer zone. The County is monitoring these locations and will report to the GSA if high saline water moves.

In the northern part of the subbasin, groundwater occurrence is saline to brackish except locally on the margins of the valley where the formational water has been flushed with newer fresh water. Non-saline water was also observed in deeper portions of the Ione Formation in the vicinity of Oroville (Dames and Moore, 1994). Sediments that were continentally derived contain fresh to brackish water and are poorly to moderately permeable (Olmsted and Davis, 1961). In the southern part of the subbasin, numerous wells appear to be completed within the Ione Formation (boring logs identify "blue clays" believed to be indicative of the Ione Formation) that produce fresh water.

Flooding during heavy rain is causing many domestic wells in Palermo to be cross contaminated with septic effluent. This contamination has moved into the upper groundwater aquifer. Well samples taken in 2007 and in 2021 show that up to 25% of the sampled wells in Palermo have coliform contamination above safe levels to consume. The GSA, in partnership with Butte County, is actively addressing the flooding.

2.2.4.2 Additional Water Quality Programs

The goal of groundwater quality management under SGMA is to supplement information available from other sources with data targeted to assist the GSA in the Wyandotte Creek Subbasin comply with the requirements of SGMA. Development of groundwater quality-related SMC for the Wyandotte Creek Subbasin is not intended to duplicate or supplant the goals and objectives of ongoing programs including Butte County, the SVWQC (SVWQC, 2016), the CRC (2019), and the State Drinking Water Information System (SDWIS).

Because irrigated agriculture is the predominant land use in the subbasin, monitoring of the groundwater quality data developed through the GQTMWP being implemented by the SVWQC and by the CRC for compliance with the CVRWQCB's ILRP will be an important source of

information to the GSA in the Wyandotte Creek Subbasin. The SVWQC has identified one low priority High Vulnerability Area (HVA) in the South MA of Wyandotte Creek Subbasin (SVWQC, 2016). However, this area has been classified as an HVA because of conditions that make it susceptible to contamination and not due to contaminant levels observed in the area. Additional information on the ILRP is presented in the section describing the monitoring network.

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

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

Water quality samples will be collected and evaluated (as needed) to determine concentrations of other potential constituents of concern including nitrate, perfluorooctanoic acid (PFOA), and perfluorooctanoic sulfonate (PFOS) per State Water Resources Control Board recommendations[7]. All constituents currently being monitored by other agencies have been kept at reasonable levels within the Subbasin and are not impacted by groundwater pumping. Additionally, the GSA plans to develop a handout that highlights key water quality issues in the subbasin to provide to project partners to ensure projects take water quality into consideration during feasibility and design.

GSA staff and members of the consulting team stay informed regarding groundwater quality issues and mitigation programs in the Subbasin. Staff have participated in CV-SALTS webinars and have responded to CV-SALTS requests for GSA input. Additionally, point-source contaminants are managed and regulated through a variety of other programs by the Regional Water Quality Control Board, DTSC, and the EPA. Through coordination with existing agencies, the Wyandotte Creek GSA will know if existing regulations are being met or groundwater pumping activities in the Wyandotte Creek Subbasin are contributing to significant and unreasonable undesirable effects related to degraded water quality. The GSA will continue to stay engaged with these other regulatory programs.

2.2.4.3 Description and Map of Known Sites and Plumes

The SGMA regulations require that GSPs describe locations, identified by regulatory agencies, where groundwater quality has been degraded due to industrial and commercial activity. Locations of impacted groundwater were identified by reviewing information available on the SWRCB Geotracker/GAMA website, the California Department of Toxic Substances Control (DTSC) EnviroStor website, and the Environmental Protection Agency's (EPA) National Priorities List (NPL). Cases that have been closed by the supervisory agency are not considered.

[7] Groundwater Quality Considerations for High and Medium Priority Groundwater Basins. State Water Resources Control Board. November 22, 2022.

To identify known plumes and contamination within the Basin, SWRCB GeoTracker[8] and DTSC program[9],was reviewed for active clean-up sites of all types within the subbasin. The GeoTracker database shows one open Leaking Underground Storage Tank (LUST) site and five open cleanup program sites with potential or actual groundwater contamination located within the subbasin. Underground storage tanks (UST) are containers and tanks, including piping, that are completely or significantly below ground and are used to store petroleum or other hazardous substances. Soil, groundwater and surface water near the site can all be affected by releases from USTs. The DTSC program listed two open cases, with one potential overlap with GeoTracker. A summary of each active site is listed below.

[8] Information on these and other sites is available at https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Sacramento

[9] Information on these and other sites is available at www.envirostor.dtsc.ca.gov.

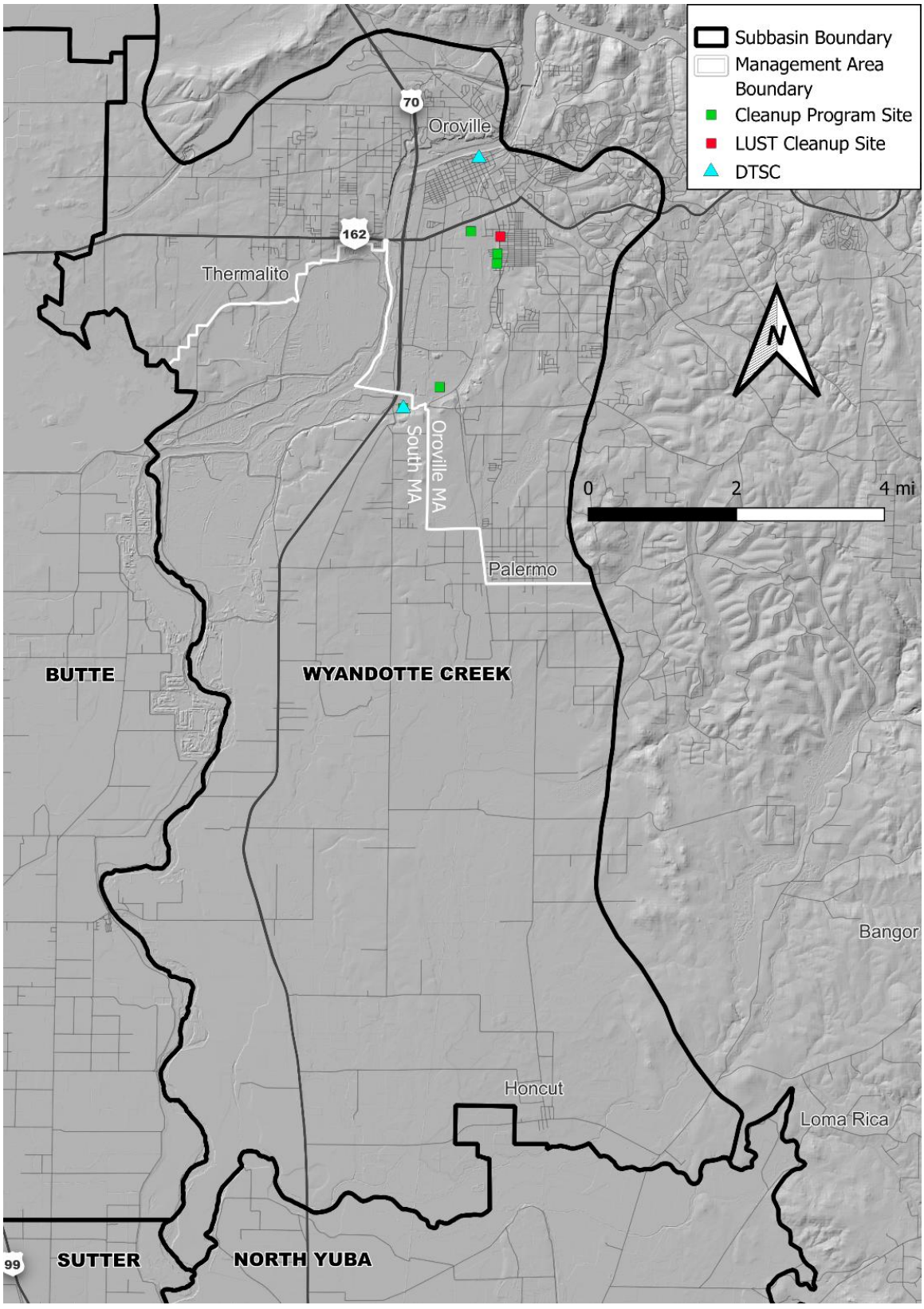


Figure 2-16. Active Contamination Remediation Sites

Active clean-up sites in the Wyandotte Creek Subbasin include the following:

LUST Cleanup Site

- No. T0600766902 – ATWALS:
    - Past use that caused contamination: gasoline service station
    - Potential contaminants of concern: gasoline
    - Potential Media affected: aquifer used for drinking water supply

GeoTracker Cleanup Program Sites

- No. T10000013302 – Former Mill Property:
    - Past use that caused contamination: former mill site
    - Potential contaminants of concern: Arsenic, Dioxin / Furans, Lead, Pentachlorophenol (PCP)
    - Potential Media affected: none specified
- No. SL0600770982 - Chlorinated Solvents, Unknown Rp (Oroville)
    - Past and current use that caused contamination: Potentially Responsible Party (PRP) Search Report by Partner Engineering Science, Inc.
    - Potential contaminants of concern: Chlorinated Solvents - PCE, Tetrachloroethylene (PCE)
    - Potential Media affected: Well Used For Drinking Water Supply
- No. T10000013678 - Delallo Italian Foods, Inc
    - Past and current use that caused contamination: Olive processing and packing companies
    - Potential contaminants of concern: Tetrachloroethylene (PCE)
    - Potential Media affected: Under Investigation
- No. T10000012642 - Koppers Co. Inc. (Oroville Plant) Superfund Site
    - Past and current use that caused contamination: wood treating facility
    - Potential contaminants of concern: Arsenic, Boron, Chromium, Copper, Dioxin / Furans, Pentachlorophenol (PCP), Polynuclear Aromatic Hydrocarbons (PAHS)
    - Potential Media affected: Soil, Well Used For Drinking Water Supply
- No. T10000000611 - Chico Scrap Metal - Ophir Road Facility
    - Past and current use that caused contamination: accumulation of materials related to salvage and metal recycling
    - Potential contaminants of concern: Arsenic, Chromium, Copper, Lead, Polychlorinated Biphenyls (PCBS), Silver
    - Potential Media affected: Soil

DTSC Cleanup Program Sites

- No. 60000689 – Ophir Road Property:
  - Past use that caused contamination: junkyard, recycling, sand blasting
  - Potential contaminants of concern: metals, polychlorinated biphenyls (PCBs)
  - Potential Media affected: soil
- No. 60001282 – Pacific Gas and Electric Company (PG&E) Former Oroville Manufactured Gas Plant Site:
  - Past use that caused contamination: manufactured gas plant
  - Potential contaminants of concern: arsenic, cyanide, lead, polynuclear aromatic hydrocarbons (PAHs); total petroleum hydrocarbons (TPH)-diesel
  - Potential media affected: aquifer used for drinking water supply, soils, soil vapor

Active and Inactive Contamination Remediation Sites are shown in Figure 2-16, presenting the locations of known impacted groundwater or potentially impacted groundwater in the Wyandotte Creek Subbasin. The sites were divided into the following categories based on regulatory designation:

- Leaking Underground Storage Tank (LUST) Cleanup Sites (Active or Inactive)
- Cleanup Program Sites (Active or Inactive)
- Military Cleanup Sites (Active or Inactive)
- DTSC (Active or Inactive)

The GSA may periodically review all contamination plumes within the Subbasin to monitor the potential impact to groundwater. In coordination with state agencies, potential constituents of concern will also be monitored to track potential transport into new areas of the subbasin.

2.2.5 Land Subsidence

2.2.5.1 Rates and Locations

The SGMA regulations define the MT for significant and unreasonable land subsidence to be the "rate and the extent of land subsidence." Unlike other sustainability indicators (SIs), the harmful effects of subsidence result from the damage it may cause to critical infrastructure and the costs of repairing or mitigating those damages. Critical infrastructure in the Wyandotte Creek Subbasin that could be affected by subsidence includes county, and state highways, power transmission lines and water conveyance and distribution facilities.

Land subsidence is a gradual settling or sudden sinking of the Earth's surface owing to subsurface movement of earth materials often caused by groundwater or oil extraction. The potential effects of land subsidence include differential changes in elevation and gradients of stream channels, drain and water transport structures, failure of water well casings due to compressive stresses generated by compaction of aquifer system, and compressional strain in engineering structures and houses. Inelastic land subsidence is a major concern in areas of active groundwater extraction due to infrastructure damage, permanent reduction in the groundwater storage capacity of the aquifer, well casing collapse, and increased flood risk in low lying areas. To date, no inelastic land subsidence has been recorded in Wyandotte Creek Subbasin or surrounding subbasins.

Processes that can contribute to land subsidence include aquifer compaction by overdraft, hydrocompaction (shallow or near-surface subsidence) of moisture deficient deposits above the water table that are wetted for the first time since deposition, and subsidence caused by tectonic forces (Ireland et al., 1984). Land subsidence in the Wyandotte Creek Subbasin would most likely occur as a result of aquitard consolidation. An aquitard is a saturated geologic unit that is incapable of transmitting significant quantities of water. As the pressure created by the height of water (i.e., head) declines in response to groundwater withdrawals, aquitards between production zones are exposed to increased vertical loads. These loads can cause materials in aquitards to rearrange and consolidate, leading to land subsidence. Factors that influence the rate and magnitude of consolidation in aquitards include mineral composition, the amount of prior consolidation, cementation, the degree of aquifer confinement and aquitard thickness.

Subsidence has elastic and inelastic deformation components. As the head lowers in the aquifer, the load that was supported by the hydrostatic pressure is transferred to the granular skeletal framework of the formation. As long as the increased load on the formation does not exceed the pre-consolidation pressure, the formation will remain elastic. Under elastic conditions, the formation will rebound to its original volume as hydrostatic pressure is restored. However, when the head of the formation is lowered to a point where the load exceeds pre-consolidation pressure, inelastic deformation may occur. Under inelastic consolidation, the formation will undergo a permanent volumetric reduction as water is expelled from aquitards

2.2.5.2 Historical and Recent Cumulative Subsidence and Rates of Subsidence

Historical data from monuments in the Sacramento Valley Global Positioning System (GPS) Subsidence Monitoring Network were used to track cumulative subsidence from 2008 to 2017 and InSAR data is used from 2015 to present. The data shown in Table 2-2 includes the range of cumulative subsidence observed within the Wyandotte Creek Subbasin over the period between 2008 and 2017 as reported by Sacramento Valley GPS Subsidence Monitoring stations included in the Wyandotte Creek Subbasin Monitoring Network and a range of annual subsidence rates calculated from the cumulative totals. The range of recent cumulative subsidence and rates of subsidence over the period from June 2015 through September 2019 and 2020 to 2025 is also presented in the table and are based on InSAR data. As both the Sacramento Valley GPS monuments and InSAR monitor changes in land surface elevations, the data do not distinguish between elastic and inelastic subsidence, however the cumulative subsidence values observed by both sources indicate that inelastic subsidence is not significant in the Wyandotte Creek Subbasin.

Table 2-2: Cumulative Subsidence and Approximate Annual Rate of Subsidence

Subbasin Area (square miles)	Date Range	Cumulative Subsidence (feet)	Calculated Annual Rate of Subsidence (feet/year)	Source
93	2008-2017	0.038 to -0.015	0.004 to -0.002	Sac Valley
93	2015-2019	0.25 to -0.25	0.063 to -0.063	InSAR
93	2020-2025	-0.015 to -0.072	-0.003 to -0.0144	InSAR

Figures 2-17A and 2-17B show historical and recent levels of subsidence within the Wyandotte Creek Subbasin. Historical levels for the period comparing 2008 to 2017 are shown in Figure 2-17A – Historical Subsidence and are the locations of subsidence monitoring network monuments used to measure subsidence. Recent levels for the period from 2015 through 2019 are presented in Figure 2-17B – Recent Subsidence. The values presented in Table 2-2 and in Figures 2-17A and 2-17B support the observation that inelastic land subsidence due to groundwater withdrawal is unlikely to result in an Undesirable Result in the Wyandotte Creek Subbasin, and both figures show subsidence to be uniform over the subbasin.

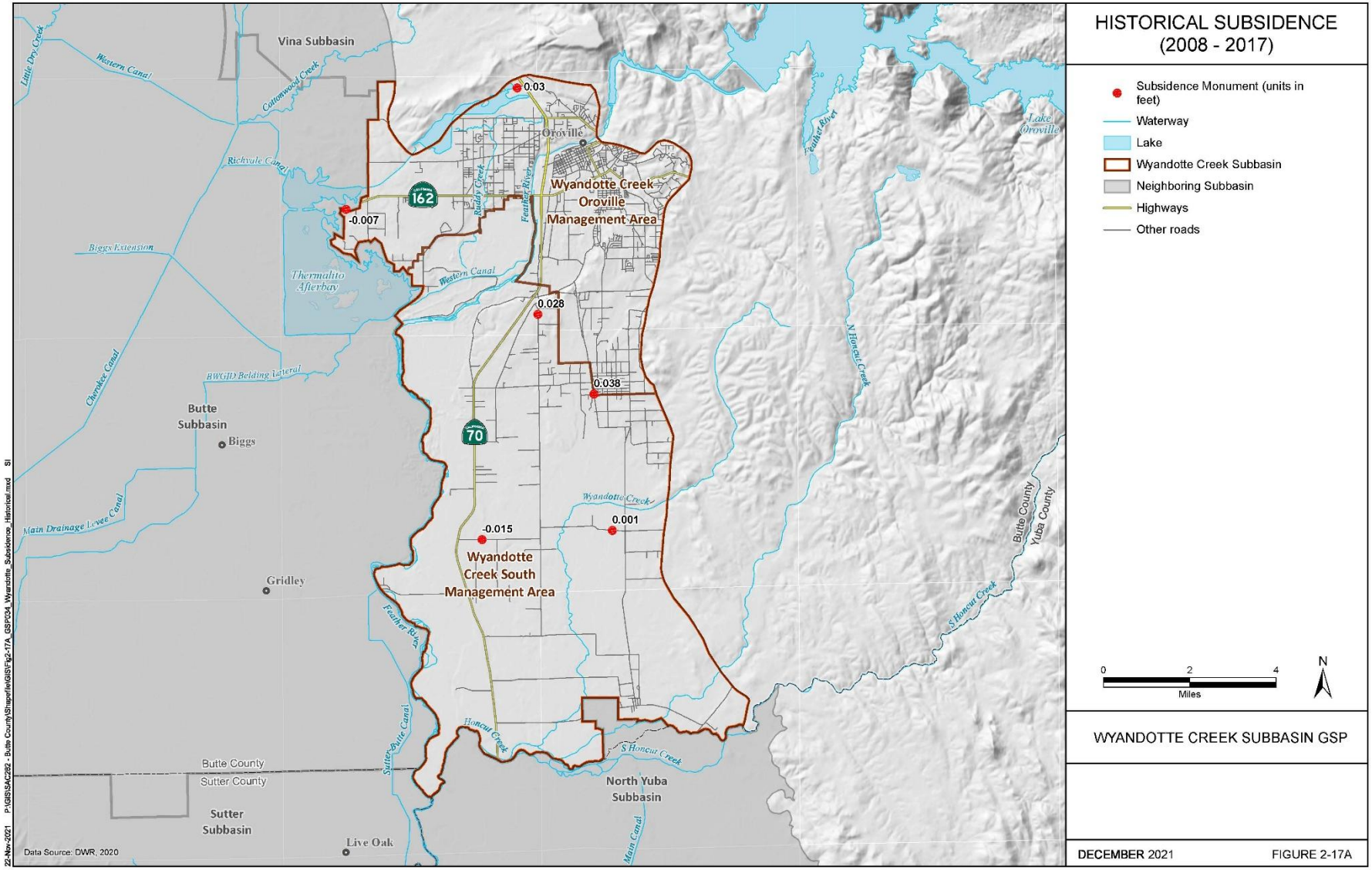


Figure 2-17A: Historical Subsidence in the Wyandotte Creek Subbasin (2008 and 2017)

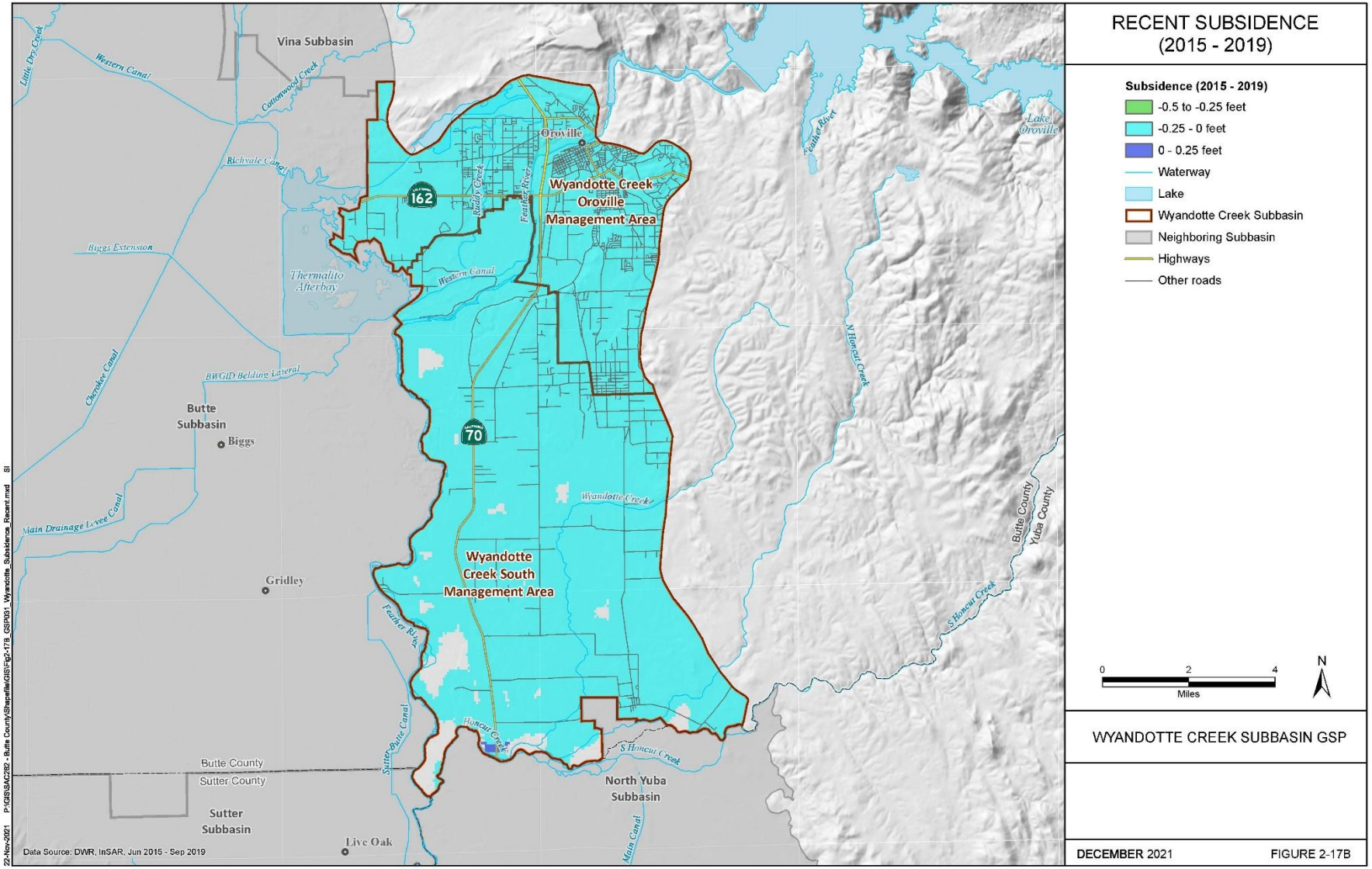


Figure 2-17B**: Recent Subsidence in the Wyandotte Creek Subbasin (2015 through 2019)**

2.2.6 Interconnected Surface Water Systems

This section describes ISW interactions and presents preliminary results identifying where ISW exist, using multiple lines of evidence (model results, groundwater elevations, water quality isotopes); the location, timing, and quantity of depletions; and remaining data gaps. ISW were identified using the BBGM, measured groundwater elevation data representative of the shallow aquifer, and an isotope study. Results from each method are presented in the following sections.

2.2.6.1 Streamflow Depletion and Accretion

The term interconnected surface water systems describes surface water features that are hydraulically connected by a continuous saturated zone to an underlying aquifer such that changes in elevations of either the aquifer or the surface water features propagate throughout the interconnected system. Within the Wyandotte Creek Subbasin, it is likely that surface water features, specifically the Feather River, are interconnected with shallow groundwater.

Interconnected surface waters are classified as either gaining or losing with respect to the condition of the surface water feature with gaining reaches gaining thorough accretion of groundwater and losing reaches losing through depletion to groundwater. It is important to recognize that these interconnections are dynamic and are affected by factors including variations in local geology, hydrology and water use.

Thus, at a single point in time, a stream may have both gaining and losing reaches and reaches that are gaining under certain seasonal, or long-term hydrologic and water use conditions may become losing under others. Moreover, changes in water use or hydrology may cause interconnected surface water features to decouple from the groundwater system.

Direct measurement of interactions between groundwater systems and surface water features is difficult because of the need for a monitoring system that tracks both stream stage and groundwater elevations at nearby locations. Therefore, the interaction between groundwater systems and surface water features within the Wyandotte Creek Subbasin is analyzed through use of the BBGM which, absent the presence of a monitoring system dedicated to assessing interactions at selected locations, integrates information from groundwater monitoring wells and stream stages to model gradients that control flow between surface water and groundwater.

The difference between gaining and losing reaches is illustrated in Figure 2-18. For gaining reaches, the water table adjacent to the stream is above the elevation of water in the stream, resulting in flow of water from the groundwater system to the stream (gains or accretions). For losing reaches, the water table adjacent to the stream is below the elevation of water in the stream, resulting flow of water from the stream to the groundwater systems (losses or seepage). In both cases, flows in the stream are directly connected to the groundwater system, with no unsaturated zone present beneath the streambed.

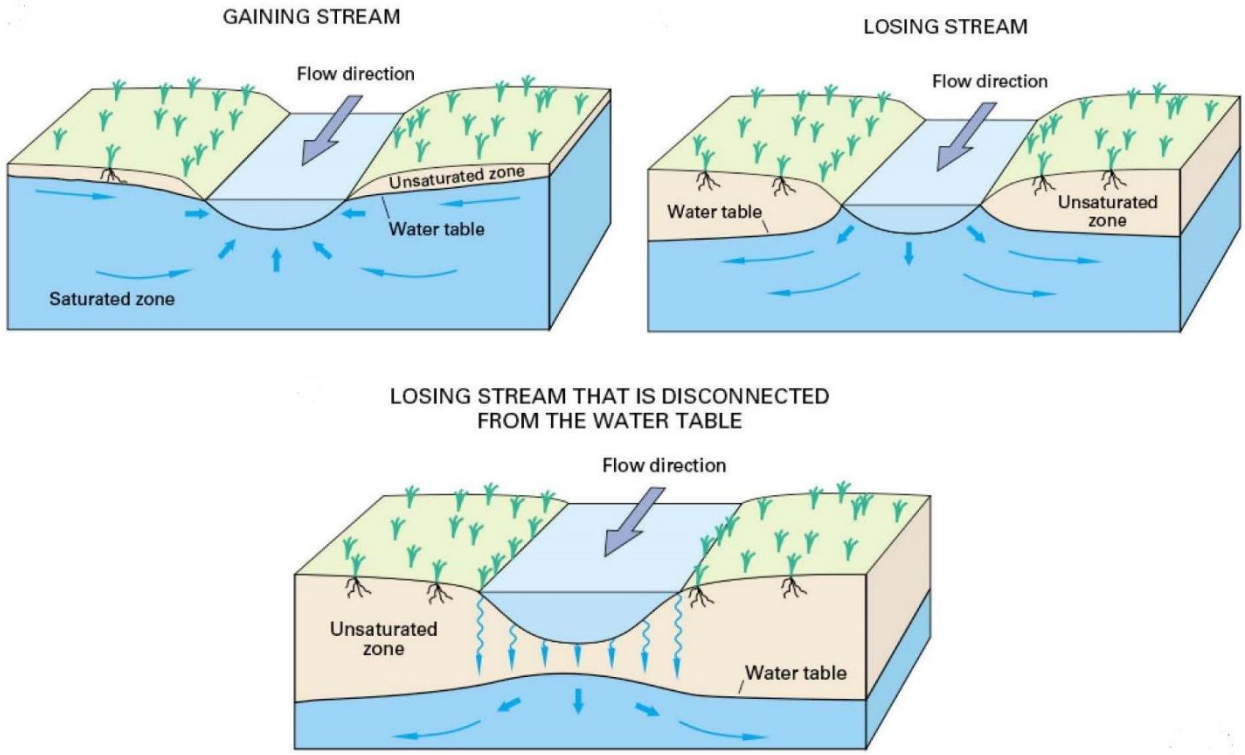


Figure 2-18: Illustration of Gaining and Losing Interconnected and Disconnected Stream Reaches (Source: USGS)

Butte Basin Groundwater Model

BBGM version 1.3 was utilized to evaluate stream segments of the Feather River and Honcut Creek along the border of the Subbasin and to classify segments as being primarily gaining or losing over the historical period from water year 2000 to 2024. A total of seven stream segments traversing or bounding the Subbasin with a total length of approximately 42 miles were defined. Characteristics of the stream segments (cross section, parameters etc.) are described in Butte Basin Groundwater Model Documentation v 1.0 (Butte County, 2021). The segments range in length from 3.4 to 7.3 miles with an average length of 5.3 miles and are shown in Figure 2-19. The results of this analysis are shown in Figure 2-20. The figure shows the percentage of months for the period from water year 2000 to 2024 with gaining conditions and classifies streams as primarily gaining (gaining conditions more than 80% of the time), primarily losing (losing conditions more than 80% of the time), or mixed. As indicated in Figure 2-20, stream segments representing the Feather River appear to be gaining more than 80% of the time. North Honcut Creek and South Honcut Creek both appear to experience gaining conditions less than 50% of the time transitioning from gaining to losing depending on time of year.

Based on consideration of the frequency with which stream segments are gaining based on BBGM results and on consideration of the spring depth to groundwater below the estimated streambed depth along each primary stream, it is likely that all streams traversing or bounding the subbasin are connected to the groundwater system.

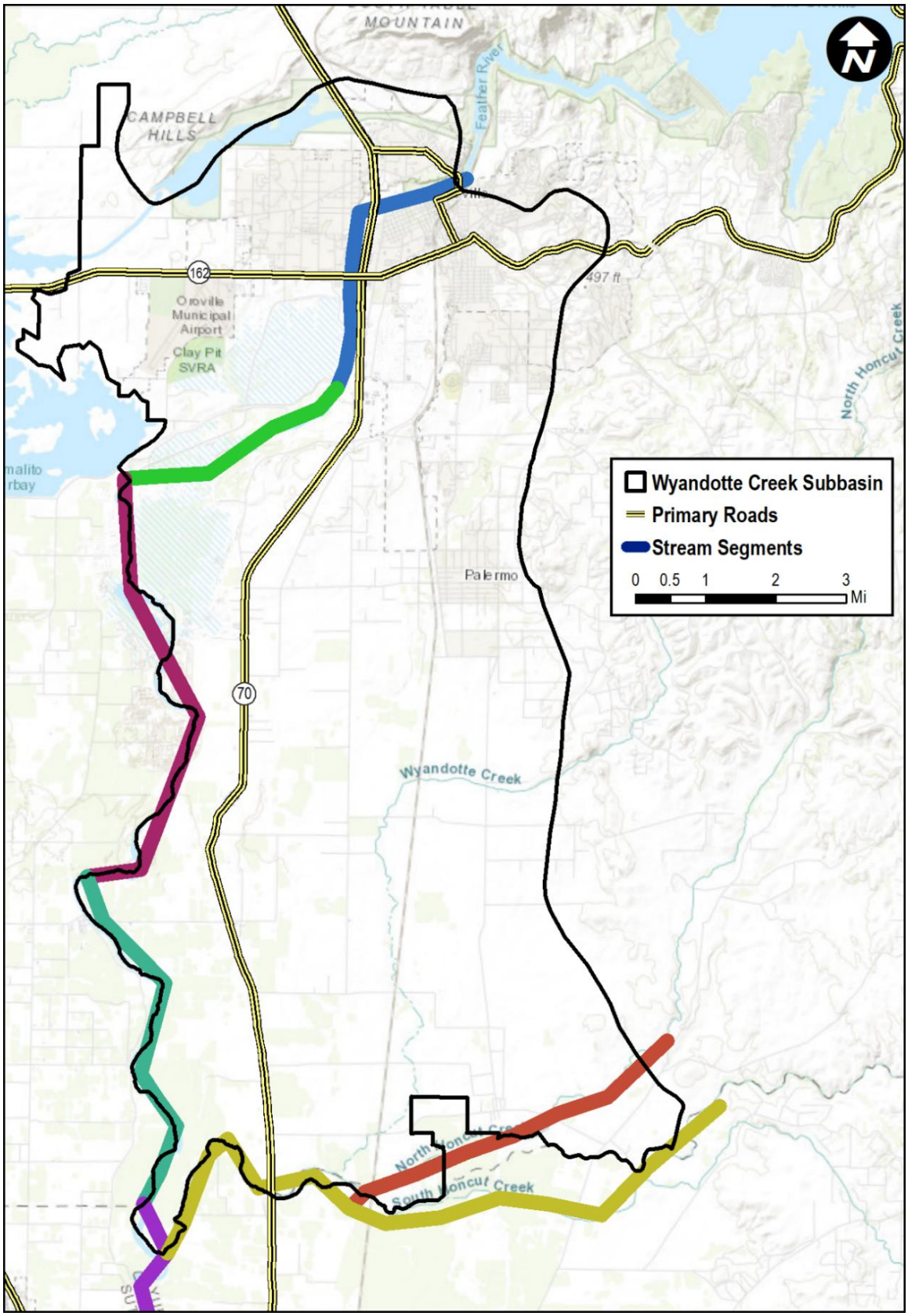


Figure 2-19: Wyandotte Creek Subbasin Stream Segments

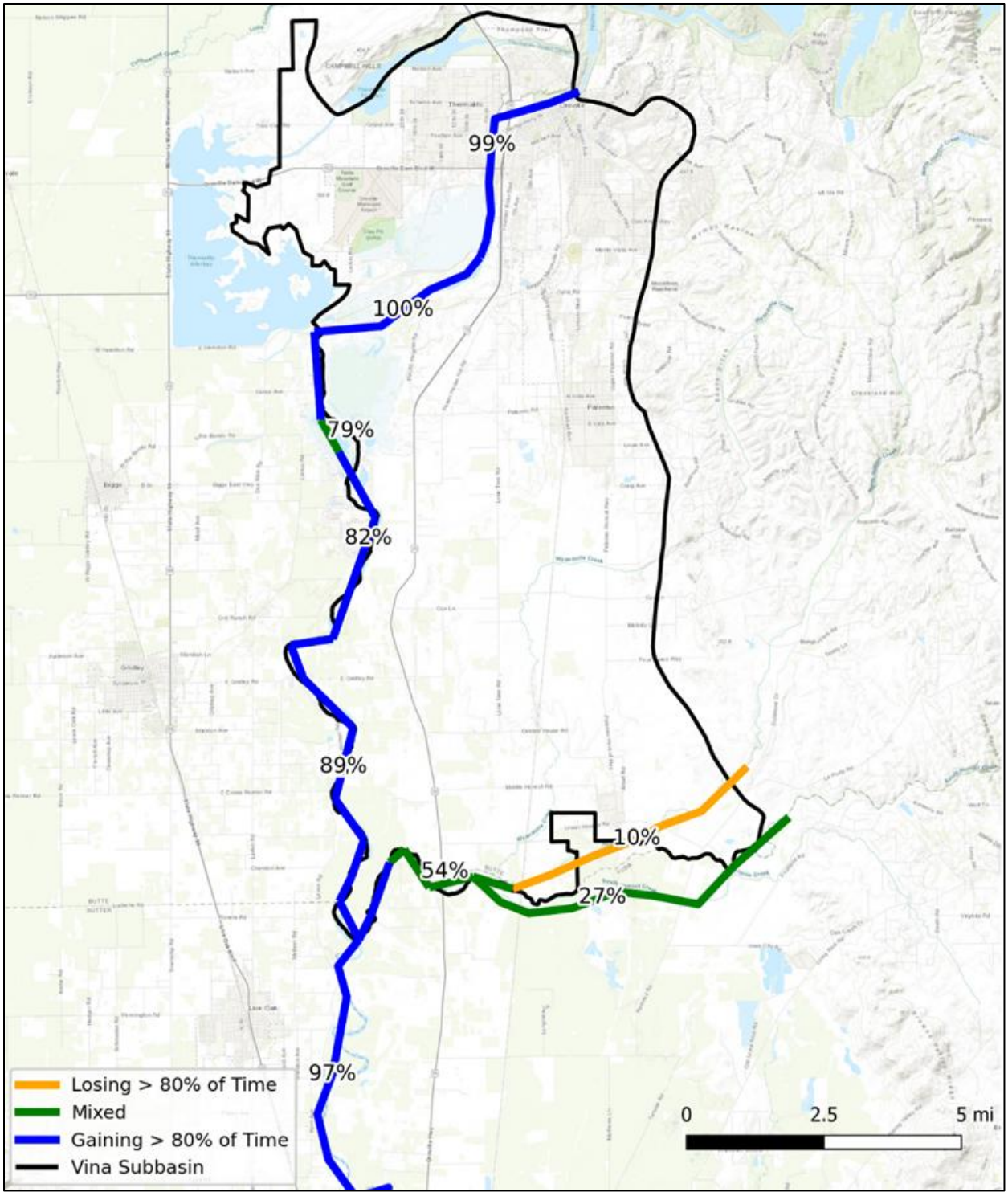


Figure 2-20: Wyandotte Creek Subbasin Gaining and Losing Stream Reaches Based on the BBGM v.1.3, Water Years 2000 to 2024.

Timing and Amount of Surface Water – Groundwater Interaction

The timing and amount of surface water–groundwater interaction was estimated using the BBGM v.1.3 for the primary streams in the Subbasin including the Feather River, North Honcut Creek, and South Honcut Creek. Wyandotte Creek and Wyman Ravine are not modeled in the BBGM. Monthly net gains to streamflow from groundwater were estimated monthly for the historical period from water year 2000 to 2024 and are summarized in Tables 2-3A and 2-3B. Average monthly gains to streamflow are expressed in cubic feet per second (cfs) and acre-feet, respectively. Negative values denote average losses from streamflow to groundwater (i.e., seepage).

Table 2-3A: Average Monthly Gains to Streamflow from Groundwater, Water Years 2000 to 2024 (cfs)

Stream	Month												Average
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	
Feather River	32	37	53	70	53	64	53	46	28	17	20	22	41
North Honcut Creek	-1	-1	-2	-1	-1	0	0	0	0	0	0	-1	-1
South Honcut Creek	0	0	0	2	2	3	3	2	0	0	-1	0	1
Total	31	36	51	71	54	66	56	48	28	17	19	21	41

Table 2-3B: Average Monthly Gains to Streamflow from Groundwater, Water Years 2000 to 2024 (TAF)

Stream	Month												Annual Total
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	
Feather River	2.0	2.2	3.3	4.3	2.9	3.9	3.1	2.8	1.7	1.0	1.2	1.3	29.6
North Honcut Creek	-0.1	-0.1	-0.1	-0.1	-0.1	0.0	0.0	0.0	0.0	0.0	0.0	-0.1	-0.7
South Honcut Creek	0.0	0.0	0.0	0.1	0.1	0.2	0.2	0.1	0.0	0.0	-0.1	0.0	0.7
Total	1.9	2.1	3.1	4.4	3.0	4.1	3.3	2.9	1.7	1.0	1.2	1.2	29.6

Average monthly gains from groundwater are greatest for the Feather River, at approximately 41 cfs. Gains are least between June and November, potentially due to relatively low groundwater elevations resulting from summer pumping. Gains tend to be greatest between late winter and spring (approximately December to May), potentially due to higher groundwater elevations relative to river stage. On average, streams traversing or bounding the subbasin are currently estimated to gain approximately 41 cfs on average, or approximately 30 TAF annually. It is

estimated that the Feather River is losing approximately 30 CFS (or 11 TAF per year) between June through November on average due to pumping within Wyandotte Creek and adjacent subbasins. This additional depletion is less than 1% of the total flow of approximately 4,800,000 AFY on the Feather River. Based on the relatively small volume of additional depletions, the relatively low level of depletions as a percentage of the total streamflow, and based on the managed nature of the Feather River, the risk of additional depletions from the Feather River are not considered to have the potential to have significant and unreasonable impacts on beneficial uses of the river.

ISW Identification using Groundwater Elevation Data

To identify the location of ISW reaches within the basin and ground truth BBGM modeled results we used seasonally interpolated shallow groundwater elevations, created from monitoring well data, in conjunction with LiDAR extracted surface water elevations. There are nine (9) existing shallow groundwater monitoring wells across the Subbasin. Well hydrographs are provided in Appendix 3-CB. Groundwater elevations were interpolated between monitoring wells to develop spatial datasets across the entire Subbasin. Groundwater elevation rasters were developed for the spring and fall from 2000 through 2025. LiDAR, or Light Detection and Ranging, is a technology that allows for precise measuring of ground surface elevations by using laser light pulses from aircraft. Longer pulse return times indicate distances farther from the aircraft, and thus lower elevations. Due to the wavelength of light used for LiDAR surveys in the Wyandotte Subbasin, water penetration was limited and it is assumed that the returned elevations of surface water bodies reflect their stage rather than their bottom elevations. To account for this uncertainty as well as uncertainty related to capillary effects below losing streams, a conservative threshold of 20 feet was used to determine connectivity (DWR, 2024). Whether inaccuracies in LiDAR measurements would change connectivity determinations is then done by comparing results generated by manual survey measurement at select locations on North Honcut Creek and Wyman Ravine. Ultimately, the above method yields the following two categories for determining surface water connectivity:

1. Likely Disconnected: Interpolated groundwater levels are greater than 20 feet below the extracted surface water elevation
2. Likely Connected: Interpolated groundwater levels are less than 20 feet below the extracted surface water elevation

Streams were gaining if the interpolated groundwater elevation is greater than the LiDAR extracted reach elevation. The exception to this is the Feather River, which in contrast to the seasonal streams in the rest of the Subbasin, has a consistent stage of many feet. To account for this, we conservatively only consider the reach gaining on the Feather River if the groundwater elevation is greater than 10 feet below the LiDAR returned elevation. This approach allows for uncertainty related to LiDAR returns off water surfaces on the Feather River, and removes the margin allocated to connected but losing streams elsewhere. We then use this classification in a similar way to the BBGM model results, and define three categories of Gaining, Mixed, and Losing.

1. Gaining: Reach is likely gaining greater than 80% of the time
2. Mixed: Reach is likely gaining between 80 and 20% of the time

3. Losing: Reach is likely losing greater than 80% of the time

Results indicate that most streams in the subbasin have groundwater elevations within 20 feet of extracted surface water elevations, with the exceptions to this being the upper reaches of Wyman Ravine and its tributary. For visualization of this result - years 2000, 2015, 2022, and 2025 were selected as being reflective of the start of the modeled period (2000), two drought years (2015 and 2022), and current conditions (2025) as shown on Figures 2-2121 through 2-2424, respectively. Of these, the modeled low points in groundwater storage (i.e., 2015 and 2022) correlate to the smallest extent of interconnected reaches. By 2025 the extent of interconnected reaches rebounds to that displayed at the beginning of the modeled period. It should be noted that there is only one well available in the southeast with sufficient data to be used in the interpolation. As a result, there may be inaccuracies in this region on North Honcut, Wilson, and South Honcut creeks. However, this method produces results that align with isotope tracers explained further in the next section.

Expanding the LiDAR analysis to all spring and fall measurements between 2000 and 2025 and applying the BBGM categories as detailed in the methods section, the Feather River and Honcut Creek are determined to be gaining, with the lower reaches of other smaller streams considered mixed (Figure 2-2525). The upper reaches of these mixed streams (Wyman Ravine, Wyandotte Creek, North Honcut Creek, South Honcut Creek, and Wilson Creek) are considered losing. Furthermore, surveyed results indicate that while LiDAR elevations can be up to 5 feet higher at channel bottom, indicating erosive action since LiDAR acquisition, classification into connected and disconnected categories would remain unchanged due to both our use of wide bin intervals and groundwater elevations that remain far below streambeds (Appendix 3-C).

Overall, the categorization of interconnected surface waters and their status as gaining or losing by use of both LiDAR extracted surface water elevations and interpolated groundwater elevations match the general spatial pattern of the BBGM v1.3 results. Due to this, despite Wyandotte Creek, Wyman Ravine, and Wilson Creek not being simulated in BBGM, estimates on these reaches are reasonable. In general, we conclude that aside from the Feather River, the likelihood of streams gaining within the subbasin increases as they traverse westward towards the Feather River, with reaches towards the outer margins often connected but losing.

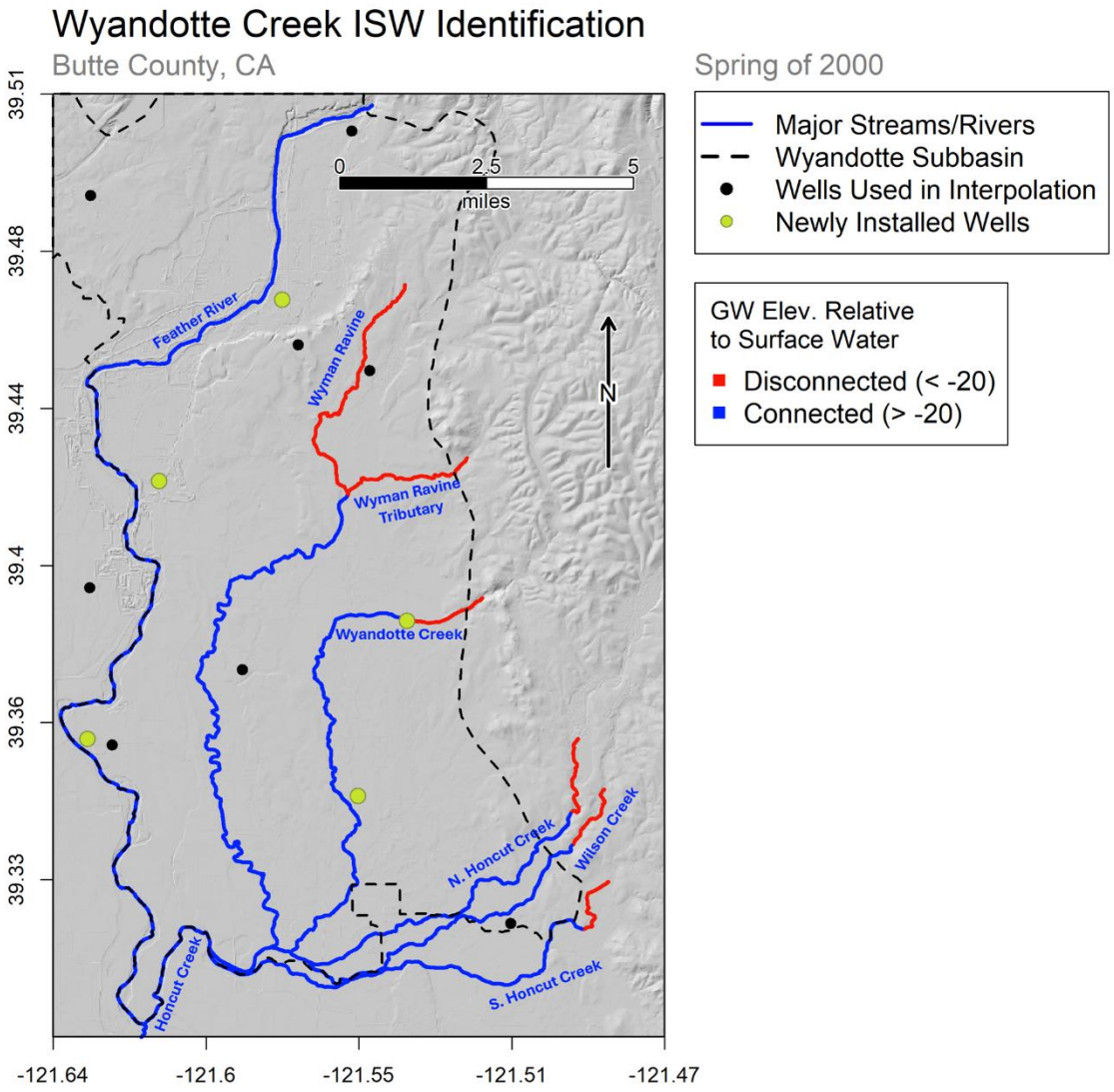


Figure 2-21: Comparison between shallow interpolated water surface elevations and LiDAR extracted streambed elevations in the spring of 2000.

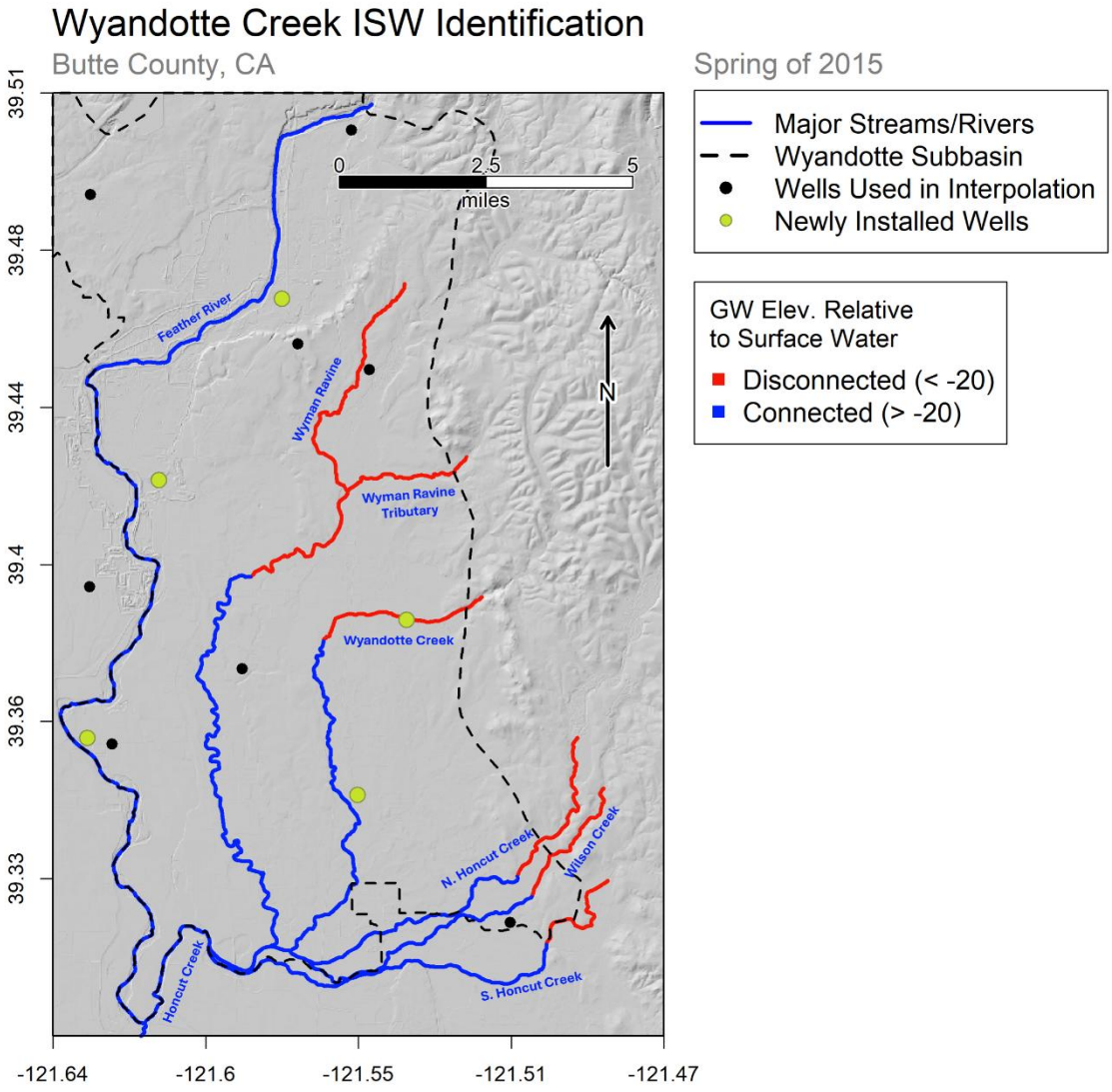


Figure 2-22: Comparison Between Shallow Interpolated Water Surface Elevations and LiDAR Extracted Streambed Elevations in the Spring of 2015.

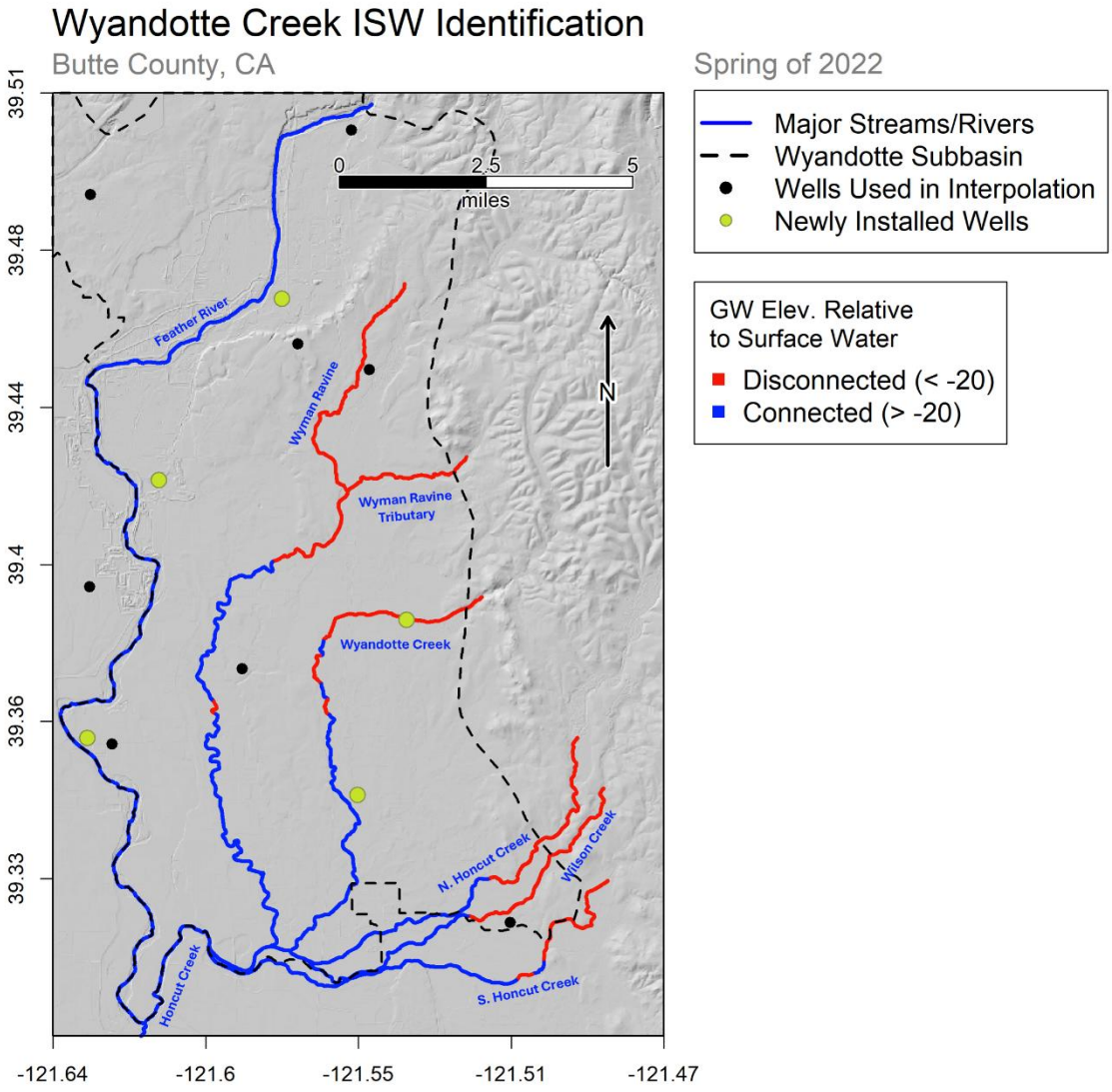


Figure 2-23: Comparison Between Shallow Interpolated Water Surface Elevations and LiDAR Extracted Streambed Elevations in the Spring of 2022.

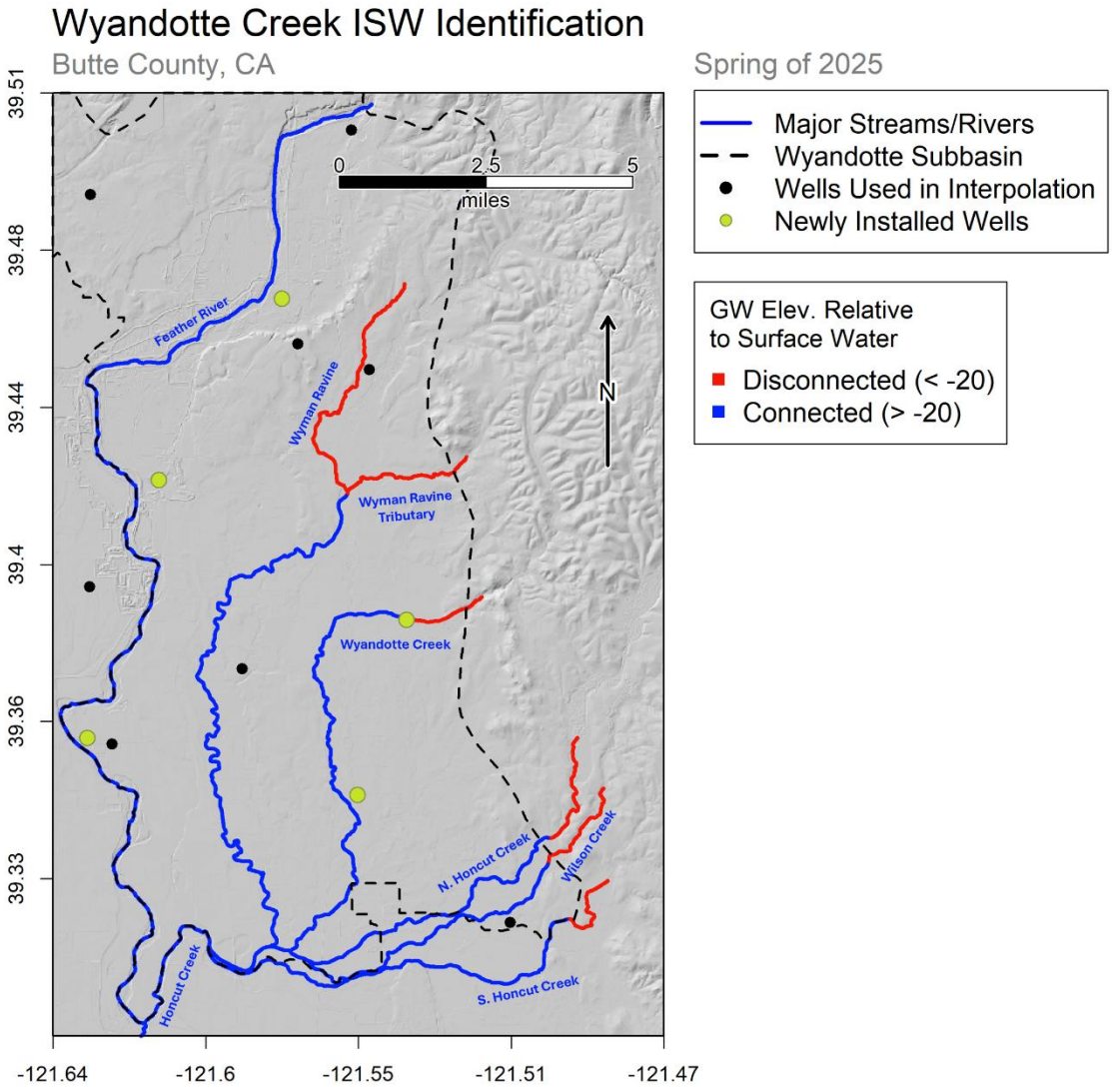


Figure 2-24: Comparison Between Shallow Interpolated Water Surface Elevations and LiDAR Extracted Streambed Elevations in the Spring of 2025.

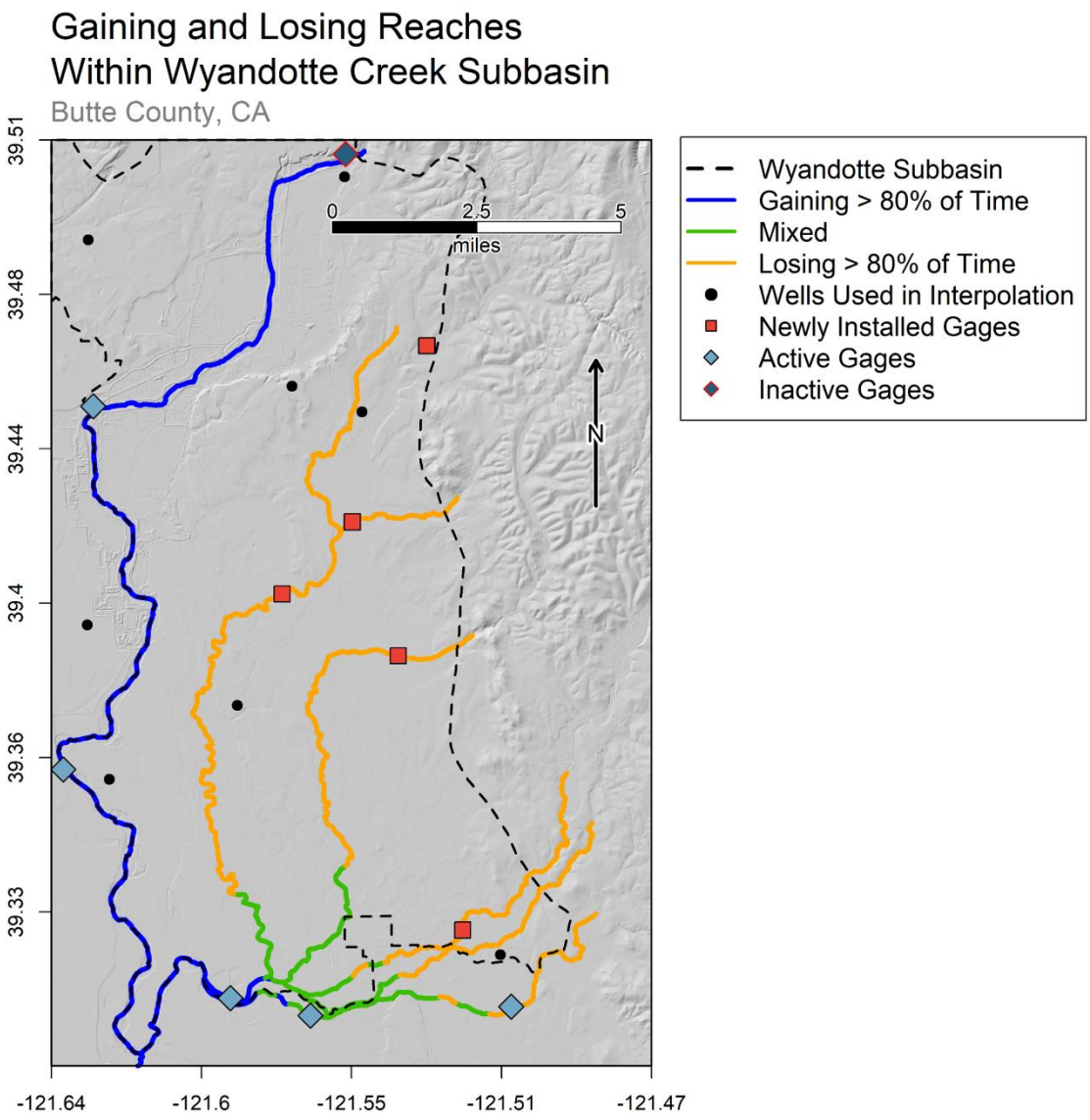


Figure 2-25: Use of Interpolated Water Surface Elevations and LiDAR Extracted Water Surface Elevations over the Period from 2000 through 2025 to Determine the Percentage of Time in Which a Given Reach is Gaining.

ISW Identification through Isotope Sampling

To understand ISW interactions on a finer timescale than seasonal groundwater interpolations can provide, radon-222 and stable isotopes of the water molecule along Wyman Ravine, Wilson Creek, and the tributaries to Honcut Creek were sampled monthly June through October of 2025. Firstly, radon-222 is a naturally occurring short-lived radioactive noble gas that is produced in geologic material and accumulates in groundwater. As groundwater discharges to the surface, radon-222 quickly degasses, and its presence therefore indicates a localized groundwater contribution to surface water flows. In a 2005 USGS study of the South Sacramento Valley,

groundwater radon-222 was measured at between 200-700 pCi/L (USGS, 2005). Therefore, it would be expected that surface water in the Wyandotte Subbasin receiving groundwater inputs (i.e. gaining) should contain elevated levels of radon-222. Secondly, as the ratio of stable isotopes of the water molecule (16O,18O,1H,2H) varies due to natural hydrologic processes such as evaporative fractionation and precipitation altitude, sampled water bodies with different source areas should be detected as having distinct isotopic fingerprints (Jameel et al., 2019; Visser et al., 2016). The combination of radon-222 and isotopes of the water molecule allow us to detect seasonal and local groundwater inputs, source area elevation, and evaporative signatures (Castaldo et al., 2021).

In terms of radon-222, low activities (< 7 pCi/L) were observed compared to the 200-700 pCi/L expected from a groundwater signal in all but the upper reach of South Honcut Creek (Figures 2-26 through 2828). When combined with the results discussed in the previous section, it is confirmed that the upper reaches of Wyman Ravine, Wilson Creek, and North Honcut Creek are losing while South Honcut Creek may retain small local groundwater contributions in the summer. This again matches BBGM modeled results regarding the status of South and North Honcut Creeks (WGSA, 2021; Figure 3). In terms of stable water isotopes, samples on North and South Honcut Creek are depleted in heavy isotopes relative to Wyman Ravine and Wilson Creek, signaling a higher elevation source area (Figure 12, Castaldo et al., 2021). Samples along North and South Honcut Creek are furthermore generally close to the Global Meteoric Water Line (GMWL) implying limited impact of evaporative fractionation (Figure 29). These results agree with the potential local groundwater contributions described above as well as the ‘mixed’ status of much of South Honcut Creek. This is in contrast to samples along Wyman Ravine and Wilson Creek, which show consistent evidence of evaporative fractionation as measured by a deuterium excess consistently below that of the GMWL (Figure 30). This is consistent with radon activities describing a lack of groundwater contribution in the summer months. Given the general agreement between the results of groundwater elevations, radon, and stable water isotopes we can conclude three things:

1. South and North Honcut Creek source water originates on average from higher in elevation than that of Wyman Ravine and Wilson Creek. This may be due to Honcut Creek is used to convey agricultural drainage and irrigation water during the irrigation season with the water originating in the upper Feather River or Yuba River watersheds.
2. South Honcut Creek may receive seasonal and local groundwater contributions, which is corroborated by fluctuations in radon-222 activity, though these contributions appear to be limited.
3. Wyman Ravine and Wilson Creek are likely either disconnected or losing along much of their length, though disagreement between LiDAR and radon results on their lower reaches may indicate that sampling in a different year would have yielded higher radon activities.

The isotope study represents a snapshot in time and may not capture transitions from gaining to losing or vice versa that occur over time. The isotope study may be continued as funding allows to assess seasonal trends and impacts from groundwater level fluctuations.

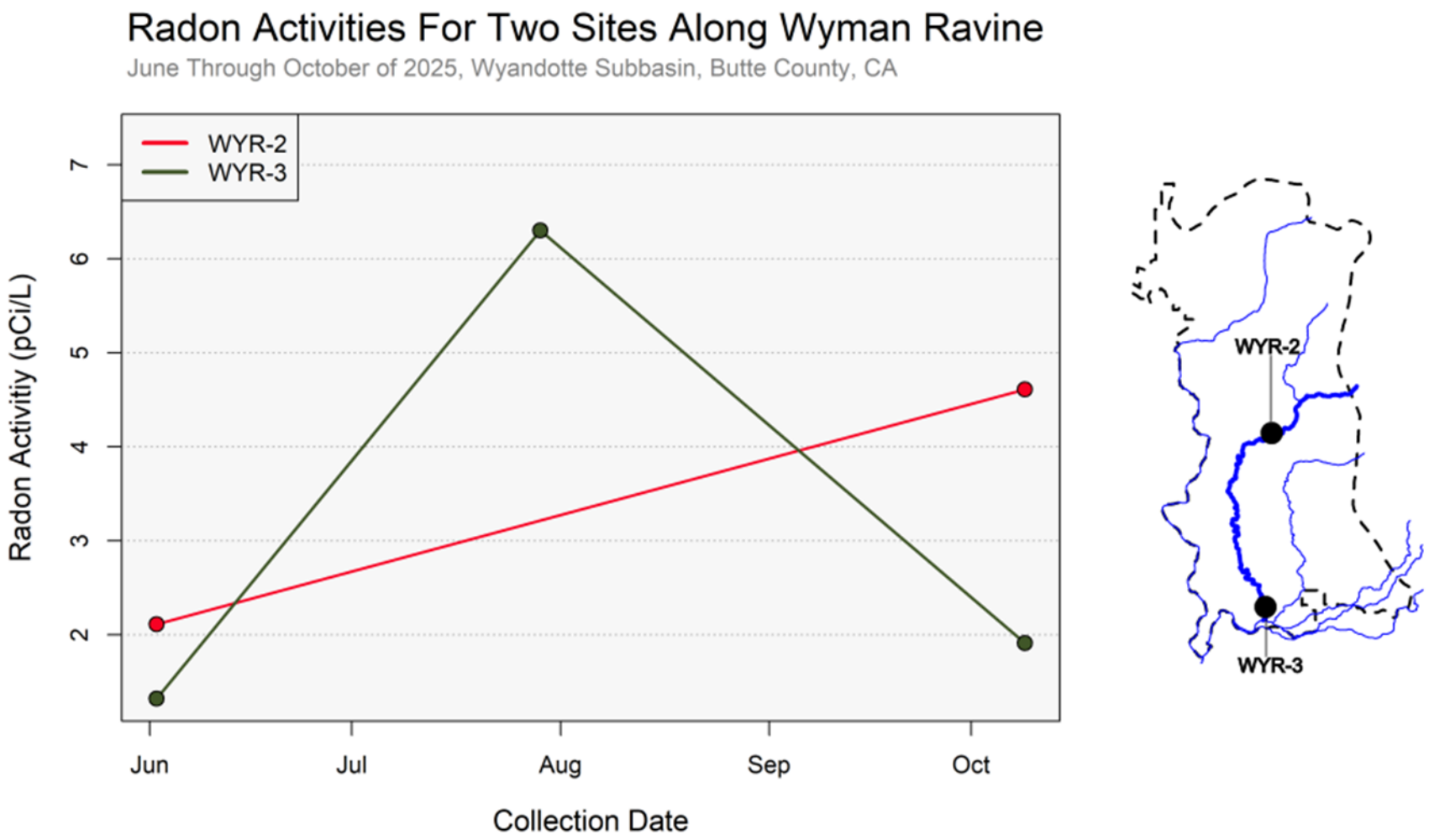


Figure 2-26: Radon Activity for Sampled Sites along Wyman Ravine in June through October of 2025

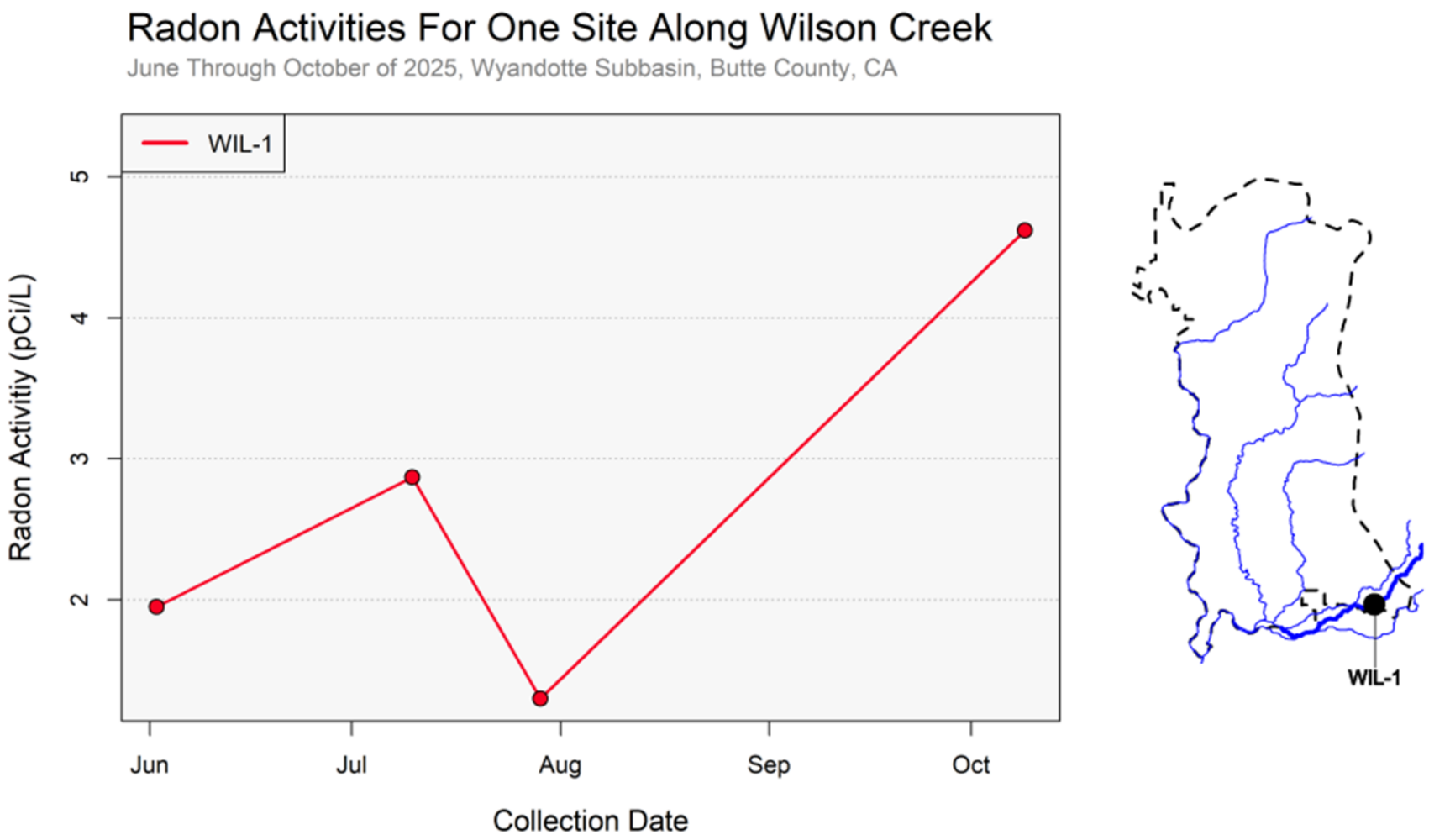


Figure 2-27: Radon activity for sampled sites along Wilson Creek in June through October of 2025

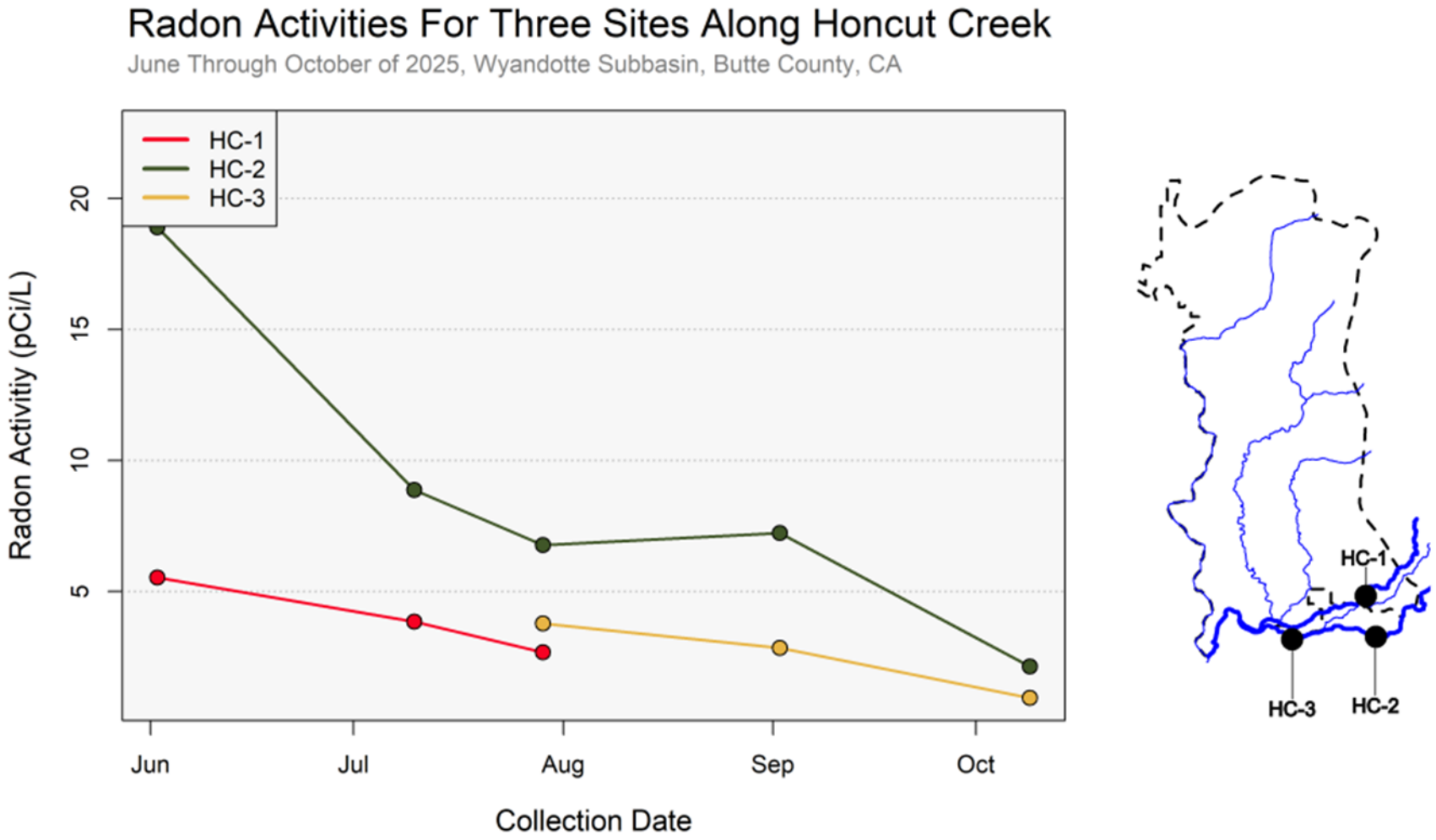


Figure 2-28: Radon Activity for Sampled Sites along Honcut Creek in June through October of 2025

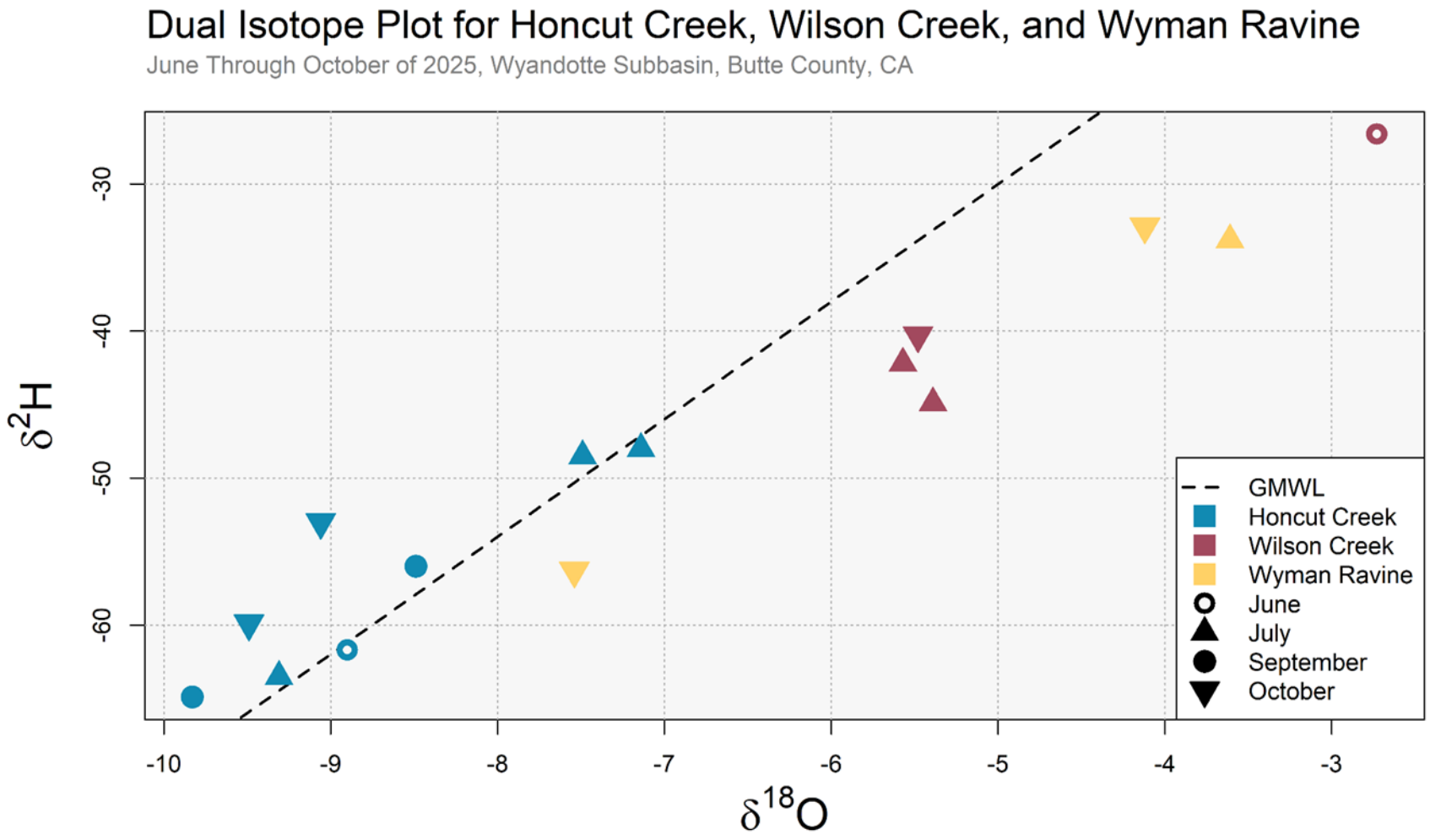


Figure 2-29: Dual isotope plot for isotopes of the Water Molecule at Sampled Sites along Honcut Creek, Wilson Creek, and Wyman Ravine in June through October of 2025

Note:**.** Delta notation is relative to Vienna Standard Mean Ocean Water (VSMOW). Global Meteoric Water Line (GMWL) is defined by the equation δD = (8 * δ18O) + 10 ‰.

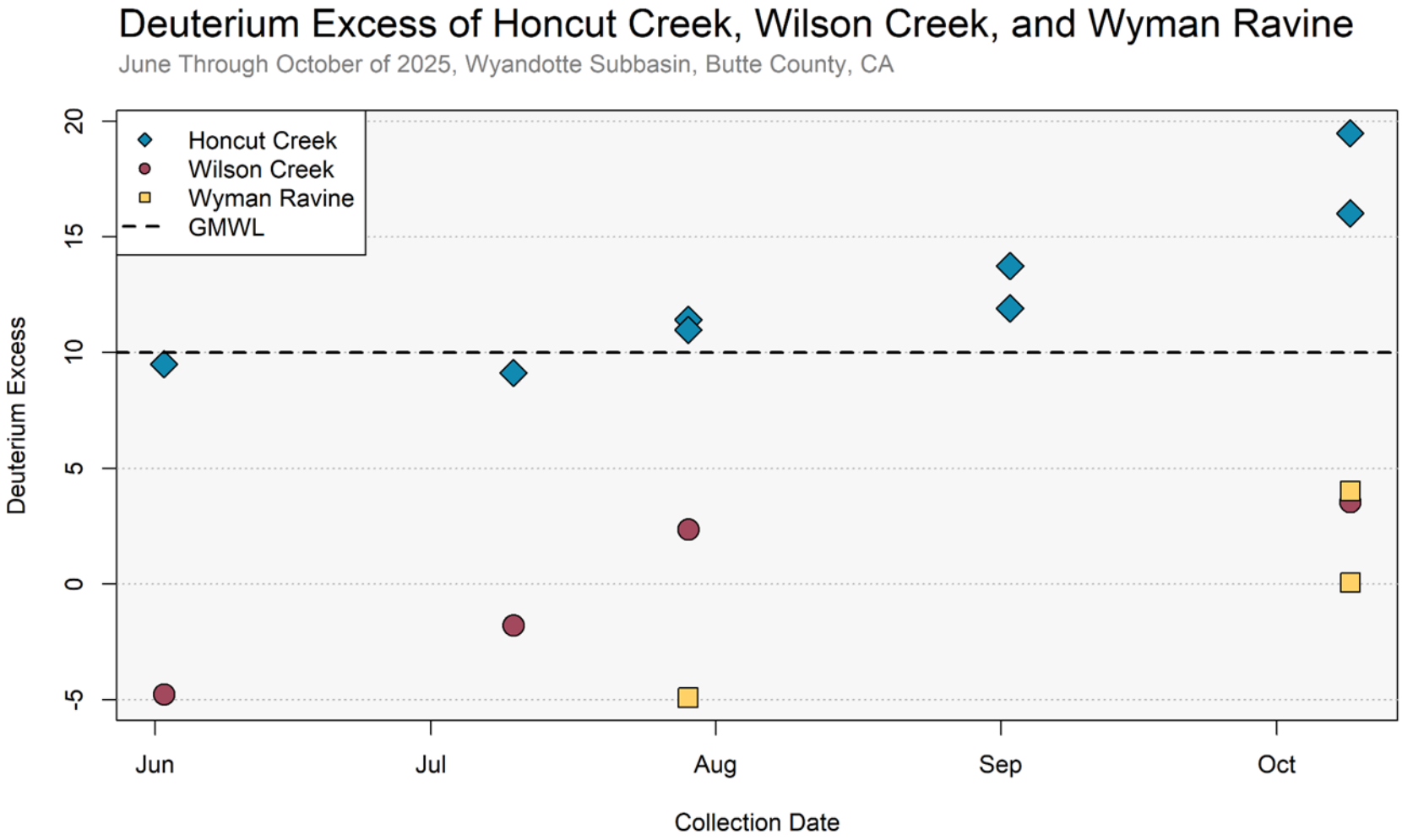


Figure 2-30: Deuterium Excess of Honcut Creek, Wilson Creek, and Wyman Ravine Samples

Note: Samples taken in June through October of 2025. Deuterium excess defined by the equation Excess = $\delta D - 8*\delta 18O$.

The sections above detail efforts in the Wyandotte Creek Subbasin to identify Interconnected Surface Water (ISW) locations using the updated BBGM (v.1.3), LiDAR extracted surface water elevations in conjunction with interpolated groundwater elevations, and stable and radioactive isotope tracers. Groundwater level monitoring wells and stream gages installed in 2026 will help address data gaps. Key findings include:

- The Feather River is primarily a gaining stream and is subject to depletions from groundwater pumping. Depletions from the Feather River are not considered to have the potential to have significant and unreasonable impacts on beneficial uses and users of the river.
- North Honcut Creek likely transitions from a gaining and losing stream depending on time of year and groundwater demands. The stream is ephemeral. Depletions from pumping are limited to when the stream is flowing, the stream is connected to the aquifer, and pumping is occurring. This limited timeframe typically ends by June and leads to a small amount of potential gains / losses in the spring as pumping starts for the irrigation season.
- Groundwater level data gaps exist along Wyman Ravine and Wyandotte Creek, ephemeral creeks. Additional monitoring wells and stream gages may be warranted before establishing SMCs in these areas.

2.2.7 Groundwater Dependent Ecosystems

Groundwater dependent ecosystems (GDEs) are defined in the SGMA regulations as "ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface" (CCR, Title 23, § 351(m)). GDEs exist within the Wyandotte Creek subbasin largely where vegetation accesses shallow groundwater for survival; and in areas with streams and creeks where a connection to groundwater exists. Without access to shallow groundwater, these plants and the ecosystems supported by the hydrology would die.

GDEs are incredibly diverse (e.g., riparian forests, rivers, and oak woodlands) and often host rare and endemic species, such as the giant garter snake or green sturgeon to name characteristic species known to occur in the Subbasin. Many of these species are protected under state and federal endangered species act. Moreover, a key goal of SGMA is to prevent depletion of interconnected surface water (ISW) that have significant and unreasonable reductions on beneficial uses and users of surface water (e.g., insufficient water for aquatic species, GDEs). For example, GDEs are closely tied to ISW because many ecosystems depend on groundwater-fed streams and rivers. If pumping reduces streamflows, it can harm fish, wildlife, and other species that make up GDEs.

Surface water depletion and GDEs were identified by the GSA in the 2022 GSP and by the DWR RCAs as having data gaps, including:

- Limited data to analyze how pumping and streamflows interact within the primary aquifer system and the impacts on GDEs,
- Limited groundwater level data for the shallow aquifer, and therefore higher uncertainty on the actual depth to groundwater throughout the subbasin,

- Uncertainty about the location and distribution of GDEs and shallow groundwater conditions in the Subbasin,
- Limited information on the baseline condition and ecological value of GDEs in the Subbasin, and,
- Uncertainty about how sensitive GDEs are to changes in groundwater levels.

To address the data gaps and DWR's RCA, a desktop analysis has been performed. This analysis brings together hydrologic, hydrogeologic, physical, and ecological datasets to better understand the baseline condition and ecological value of the subbasin's GDEs and how sensitive they may be to changes in the groundwater levels. The goals are to create more accurate maps of potential GDEs.. Ultimately, the GSA may select representative GDEs for future long term GDE monitoring. These monitoring sites would support the refinement of Sustainable Management Criteria (SMCs) and help ensure that management actions avoid significant and unreasonable impacts on GDEs.

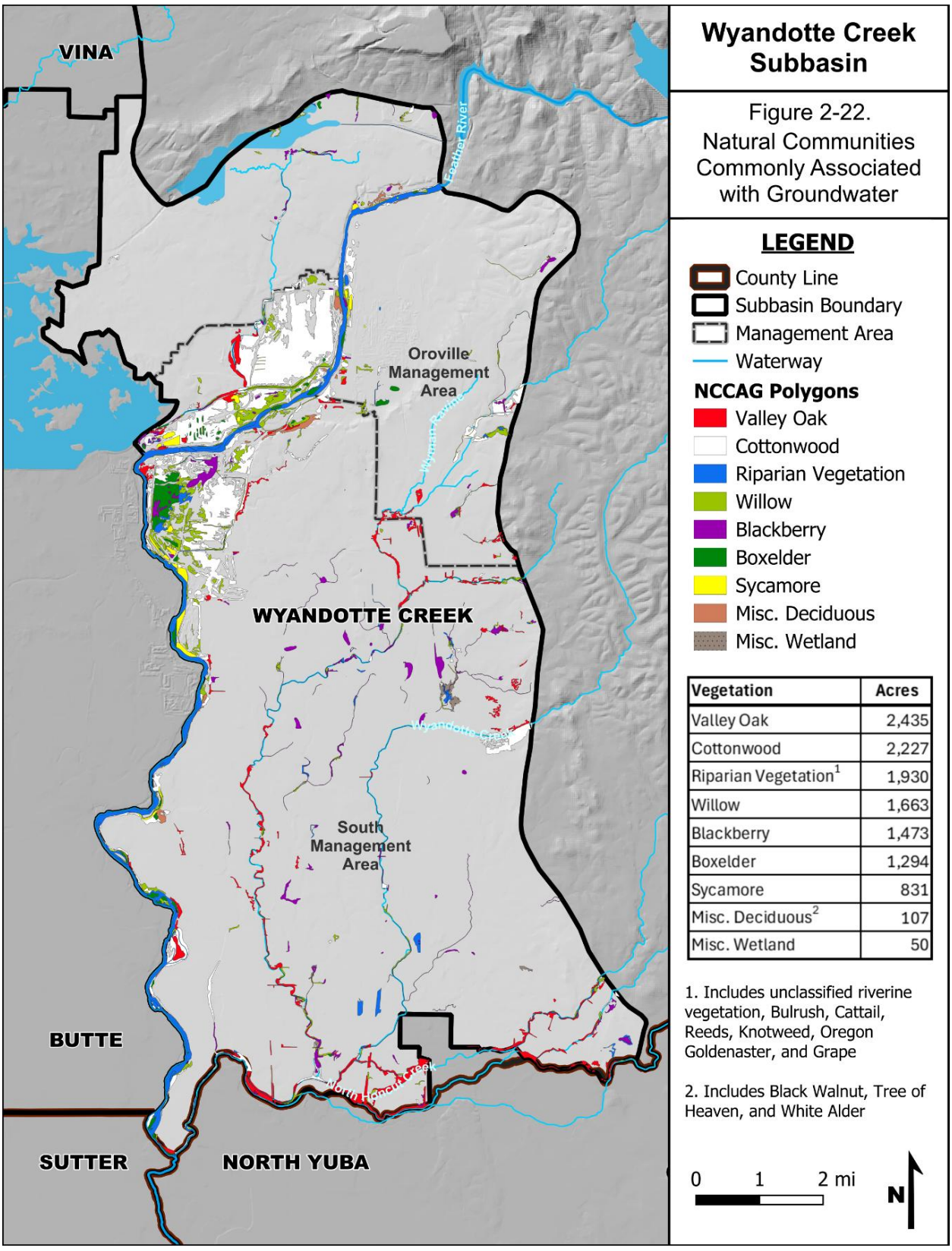
2.2.7.1 NCCAG Database

The initial identification of GDEs was performed by using the Natural Communities Commonly Associated with Groundwater (NCCAG) database to identify and map potential groundwater dependent ecosystems (iGDEs) in the Wyandotte Creek Subbasin. The NCCAG database was developed by a working group comprised of DWR, CDFW, and TNC by reviewing publicly available state and federal agency datasets that have mapped California vegetation, wetlands, springs and seeps and by conducting a screening process to retain types and locations of ecosystems commonly associated with groundwater. The results were compiled into the NCCAG database with two habitat classes defined. The first class includes wetland features commonly associated with the surface expression of groundwater under natural, unmodified conditions. The second class includes vegetation types commonly associated with the sub-surface presence of groundwater (phreatophytes). Figure 2-31 shows the locations of iGDEs identified by the NCCAG database within the Wyandotte Creek Subbasin. The primary vegetation types within the Subbasin include Valley Oaks, Cottonwoods, Riparian Vegetation (including Bulrush, Cattail, and Reeds), and Willows accounting for 2,435 acres, 2,227 acres, 1,930 acres, and 1,663 acres; respectively.

The NCCAG dataset is based on 48 layers of publicly available data developed by state or federal agencies that map vegetation, wetlands, springs, and seeps in California (DWR, 2019a). A NCCAG technical working group with representatives from DWR, CDFW, and TNC reviewed the datasets compiled to assemble the NCCAG dataset. The NCCAG dataset attempts to extract mapped vegetation and wetland features that have indicators suggesting dependence on groundwater. The data presented in NCCAG dataset display vegetation polygons that have indicators of GDEs based on published and/or field observations of phreatophytic vegetation defined as a "deep-rooted plant that obtains water that it needs from the phreatic zone (zone of saturation) or the capillary fringe above the phreatic zone" (Rohde et al., 2018). The dominance of phreatophytic plant species in a mapped vegetation type is a primary indicator of GDEs. A list of plant species considered to be phreatophytes based on peer-reviewed scientific literature on rooting depths, published lists of phreatophytes, expert field observations, and vegetation alliance descriptions is publicly available (Klausmeyer et al., 2018; DWR, 2018a).

While developing the NCCAG dataset of areas with indicators of GDEs, the technical working group attempted to exclude vegetation and wetland types and polygons that are less likely to be associated with groundwater (Klausmeyer et al., 2018). The NCCAG working group attempted to remove any polygons that are not likely to be GDEs where they occurred in areas where they are likely to be supported by alternate artificial water sources (e.g. local seepage from agricultural irrigation canals), or where appropriate available data indicated the shallow groundwater depth is located well below the rooting zone (Klausmeyer et al., 2018).

The vegetation data presented in the NCCAG dataset is a starting point for the identification of GDEs as the dataset includes the best available public datasets and has been screened to include only areas that have indicators of groundwater dependent vegetation. DWR has stated that use of the NCCAG dataset is not mandatory and does not represent DWR's determination of a GDE (DWR, 2018a). Rather, the NCCAG dataset can provide a starting point for the identification of GDEs within a groundwater basin.



Vegetation	Acres
Valley Oak	2,435
Cottonwood	2,227
Riparian Vegetation[1]	1,930
Willow	1,663
Blackberry	1,473
Boxelder	1,294
Sycamore	831
Misc. Deciduous[2]	107
Misc. Wetland	50

Figure 2-31: All Potential Groundwater Dependent Ecosystems in the Wyandotte Creek Subbasin as Identified in the Natural Communities Commonly Associated with Groundwater Database Hosted by The Nature Conservancy

2.2.7.2 Updated GDE Classification

Characterize Groundwater Conditions in the Shallow Aquifer Zone

Detailed maps were created showing groundwater levels across the region using data from monitoring wells collected between 2000 and 2025. The seasonal maps show depth to the groundwater table during spring and fall of each year, creating a comprehensive picture of how these levels change over time. By combining this groundwater information with precise land surface elevation data from 2018 LiDAR surveys, the depth to groundwater (DTG) was calculated – essentially how deep water is below the ground surface – for each season across 25 years. This resulted in a detailed map showing DTG patterns throughout the subbasin, which were then used to analyze how close groundwater comes to the surface in areas where GDEs might exist.

Refine GDE Mapping

Central locations of potential GDE areas were identified within the Wyandotte Subbasin using an existing database of natural plant communities that typically rely on groundwater. The GDEs were overlaid onto the DTG maps to track how groundwater depths varied over time at each potential GDE site.

Together, these two steps link groundwater data with ecological information. By first developing a detailed picture of groundwater conditions in the shallow aquifer and then overlaying that information with the mapped locations of potential GDEs, the analysis shows where ecosystems are likely to rely on groundwater, where they are not, and where uncertainty remains based on estimated rooting depths for each vegetation type. This connection is critical for deciding which areas should be prioritized for further study and monitoring.

To test this connection, the analysis evaluated rooting depths of groundwater-dependent vegetation from the Nature Conservancy's "Plant Rooting Depth Database." Groundwater levels were compared against rooting depths to determine whether vegetation could reliably access groundwater. GDEs with evidence supporting that groundwater levels are always outside the range accessible to vegetation were preliminarily identified as "Not likely a GDE" (no access to groundwater and would not require consideration under SGMA as part of groundwater management; i.e. not a beneficial user of groundwater), while polygons with evidence supporting that groundwater levels are within the range accessible to vegetation were preliminarily identified as "Potential GDE."[10]

Separately, a second analysis was conducted using a proposed depth to groundwater threshold of 13 feet derived from Rhode et al. (2024)[11], who developed a relationship between DTG and vegetation health to establish a protective threshold. This analysis compared groundwater levels to the 13-foot threshold to distinguish between GDEs with persistent groundwater levels that

[10] Thresholds of certainty will be defined in coordination with the GSA but is envisioned to include situations where 1:1 vegetations mapping to rooting depth relationships are not available or otherwise unclear, where groundwater depths are close to maximum rooting depths (e.g., within 10 percent), and where uncertainty in interpolated groundwater depths with within or close to maximum rooting depths.

[11] Rhode, M.M. et al. (2024). Establishing ecological thresholds and targets for groundwater management. Nature Water. https://doi.org/10.1038/s44221-024-00221-w

theoretically maintain healthy conditions versus those where groundwater levels may lead to more stressful conditions.

Together, these two methods provide complementary perspectives.

The rooting depth analysis focuses on whether groundwater levels fall within the range that specific plant species can access, while the 13-foot threshold offers a broader, protective benchmark across vegetation types. Comparing results from both approaches helps identify areas that are clearly groundwater dependent, areas that are clearly not, and areas where uncertainty remains.

As a basis of comparison DTG was evaluated for the 90th percentile groundwater elevation (the elevation met or exceeded 90 percent of the time at each GDE during the period of record), the fall season for 2015 (the year SGMA came into effect), and 2021 (recent historical low groundwater levels).[12] These groundwater elevations were selected as basis for comparison because they represent typical, dry, and extremely dry conditions, respectively. GDEs where DTG was greater than or equal to rooting depths are likely potential GDEs whereas those where DTG is greater than rooting depth are not likely GDEs.

Updated GDE Map

As shown on Figure 2-3123, potential GDEs were identified along the Feather River, Honcut Creek, lower Wyman Ravine, and lower Wyandotte Creek. The red areas in the middle of the Subbasin and further east correspond to areas that are not likely a GDE as vegetation rooting depths are above historical water table elevations used in the analysis described above. These areas may rely on stored precipitation in the rootzone, perennial or supplemental surface water supplies, or access to water from adjacent irrigated agricultural fields.

Existing and proposed groundwater monitoring wells tracking water table conditions are shown using yellow and blue triangles on Figure 2-3223, respectively. There are seven existing wells and fourteen proposed wells across the Subbasin. The proposed wells will improve understanding of geological and water table conditions near streams and potential GDEs. The updated GDE map is preliminary and subject to change as new data becomes available.

Additional information on the updated GDE classifications and field surveys are available in report titled “Wyandotte Creek Groundwater Subbasin Groundwater Dependent Ecosystem Analysis (February 2026).”

[12] The 90th percentile represents an estimate for the frequency of a given groundwater levels being observed.

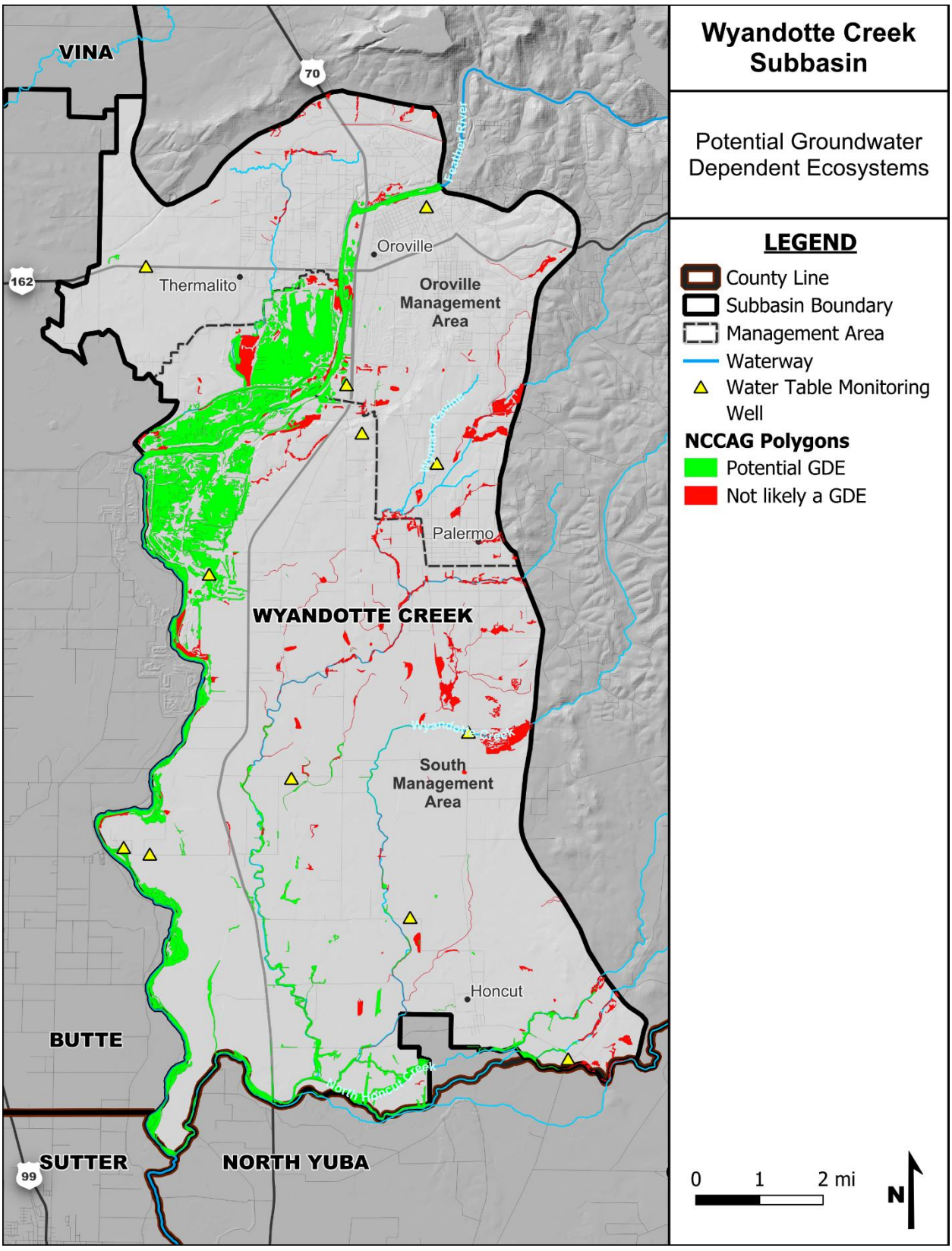


Figure 2-32: Potential Groundwater Dependent Ecosystems in the Wyandotte Creek Subbasin

2.3 Water Budget

This section describes historical, current, and projected water budgets in accordance with §354.18 of the GSP Emergency Regulations, including quantitative estimates of inflows to and outflows from the basin over time and annual changes in water storage within the basin. Components of the water budgets are depicted in Figure 2-33.

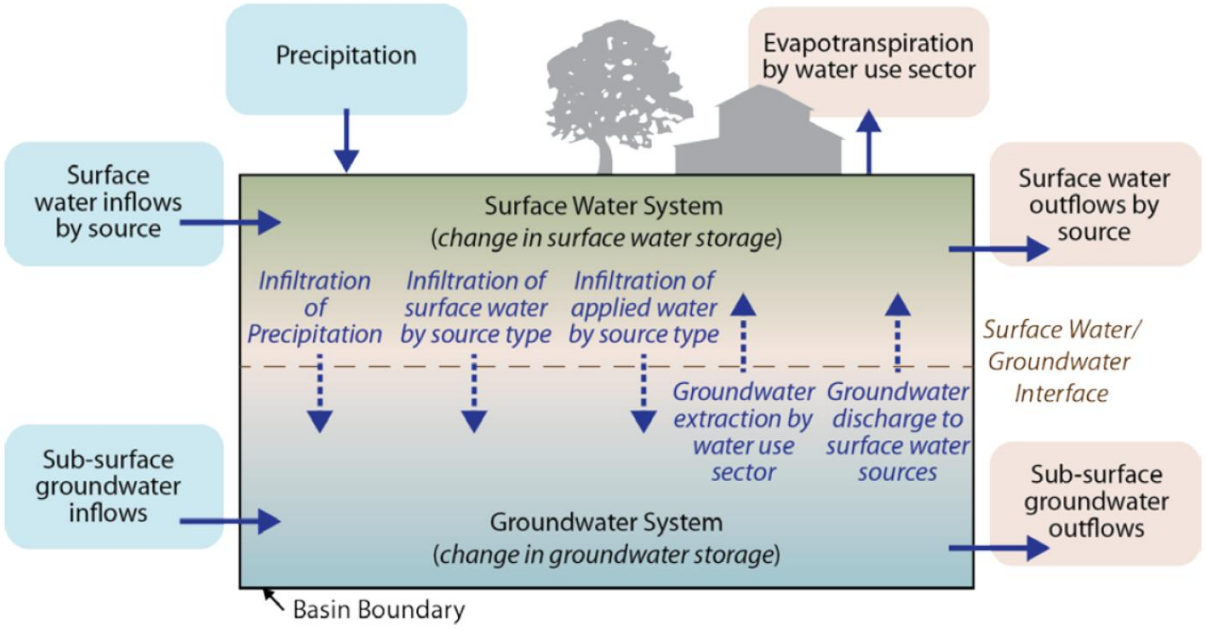


Figure 2-33: Water Budget Components (DWR, 2016)

Water budgets were developed considering hydrology, water demand, water supply, land use, population, climate change, surface water – groundwater interaction, and subsurface groundwater inflows and outflows to and from neighboring basins. Water budget results are reported on a water year basis spanning from October 1 of the prior year to September 30 of the current year. The water budget presented in this section is based on the Butte Basin Groundwater Model (version BBGM v.1.00) used during the 2022 GSP development. Current conditions are based on data through 2018.

2.3.1 Selection of Hydrologic Periods

The GSP Emergency Regulations require evaluation of water budgets over a minimum of 10 years for the historical water budget, using the most recent hydrology for the current water budget, and 50 years of hydrology for the projected water budget. Hydrologic periods were selected, as described below, for each water budget category based on consideration of the best available information and science to support water budget development and based on consideration of the ability of the selected periods to provide a representative range of wet and dry conditions.

- Historical – The 19-year period from water years[13] 2000 to 2018 was selected based on the level of confidence in historical information to support water budget

[13] A water year is defined as the period from October 1 of the prior year to September 30 of the current year. For example, water year 2000 refers to the period from October 1, 1999, to September 30, 2000.

development considering land use, surface water availability, hydrology, and other factors.

- Current Conditions – Historical water budget information for 2018 represents the most recent hydrology. To provide a broader basis for understanding current water budget conditions, a water budget scenario combining current land use and urban demands with 50 years of hydrology was selected. The period selected was 1971 to 2018 (48 years) with 2004–2005 (two relatively normal years) repeated at the end of the scenario. An advantage of evaluating the current conditions water budget over a representative 50-year period is that the results provide a baseline for evaluation of the projected water budgets. Results for 2018, the most recent available information, are provided in Appendix 2-A.
- Future Conditions – Consistent with the current conditions water budget, the period selected for the projected water budgets was 1971 to 2018 (48 years) with 2004–2005 repeated at the end of the scenarios to provide a full 50-year period as required by the GSP Emergency Regulations.
- Selection of the 50-year hydrologic period for the current and projected water budget scenarios was based primarily on three considerations:
  - The BBGM, the primary tool used to develop the water budgets, has a simulation period from water years 1971 to 2018.
  - The Sacramento Valley Water Year Index[14] over the period from 1971 to 2018 has an average of 8.0, as compared to 8.1 for the 103-year period from 1906 to 2018 (1906 is the first year for which the index is available) (Figure 2-34).
  - The selected period includes a combination of wet and dry cycles, including relatively wet periods in the early 1970s, mid 1980s, and late 1990s and dry periods in the late 1970s, early 1990s, and from approximately 2007 to 2015.
- Additionally, annual precipitation for the 1971 to 2018 period averaged approximately 26.3 inches per year, as compared to 24.8 inches for the 1906 to 2018 period indicating slightly drier conditions than the full period of record for the Sacramento Valley Index.

[14] The Sacramento Valley Water Year Index classifies water years as wet, above normal, below normal, dry, or critical based on Sacramento River unimpaired flows. Additional details describing the Sacramento Valley Water Year Index are available from the California Data Exchange Center (https://cdec.water.ca.gov/reportapp/javareports?name=WSIHIST).

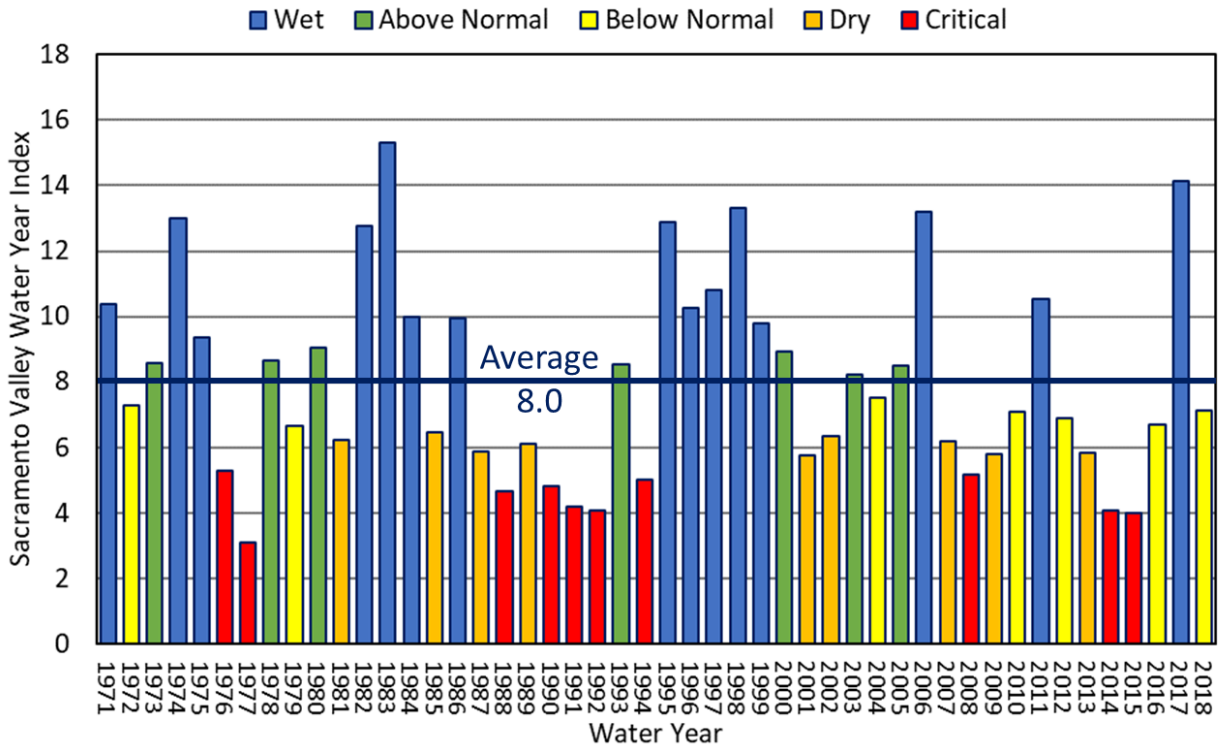


Figure 2-34: 1971 – 2018 Sacramento Valley Water Year Index and Water Year Types

2.3.2 Usage of the Butte Basin Groundwater Model

Development of the original BBGM began in 1992 under the direction and funding of the Butte Basin Water Users Association. The model has been updated over time to simulate historical conditions through water year 2018. The model performs calculations on a daily time step with some daily input (i.e., precipitation, stream inflow), some monthly input data (i.e., surface water diversions) and some annual input data (i.e., land use). Refinements to the model over time include additional crop types to better represent ponded crops (i.e., rice and wetlands), recalibrated soil parameters, and elemental land use. The development of the BBGM is described in more detail in BCDWRC, 2021. The BBGM was updated to version 1.3 and extended through water year 2024. Further information on model updates is available in Woodard & Curran, January 2026. This section did not use the updated BBGM v1.3 as additional model calibration is recommended before its application in the Wyandotte Creek subbasin.

To prepare water budgets, historical BBGM results for water years 2000 to 2018 have been relied upon, and four additional baseline scenarios have been developed to represent current and projected conditions utilizing 50 years of hydrology (described previously). Specific assumptions associated with these scenarios are described in the following section.

2.3.3 Water Budget Assumptions

Assumptions utilized to develop the historical, current, and projected water budgets are described below and summarized in Table 2-4.

Table 2-4: Summary of Water Budget Assumptions (version BBGM v.1.00)

Water Budget	Analysis Period	Hydrology	Land Use	Water Supplies
Historical Simulation	2000 – 2018	Historical	Historical	Historical
Current Conditions Baseline	1971 – 2018	Historical	Current (2015 and 2016)	Current (2015 and 2016 surface water diversions, 2016-2018 average urban demands)
Future Conditions, No Climate Change Baseline	1971 – 2018	Historical	Current, adjusted based on Butte County 2030 General Plan	Current (2015 and 2016 Surface water diversions and 2050 projected urban demands)
Future Conditions, 2030 Climate Change Baseline	1971 – 2018	Historical, adjusted based on 2030 climate change	Current, adjusted based on General Plan	Current, adjusted based on climate change
Future Conditions, 2070 Climate Change Baseline	1971 – 2018	Historical, adjusted based on 2070 climate change	Current, adjusted based on General Plan	Current, adjusted based on climate change

2.3.3.1 Historical Conditions

A historical water budget was developed to support understanding of past aquifer conditions, considering surface water and groundwater supplies utilized to meet demands. The historical water budget was developed using the BBGM and incorporates the best available science and information. Historical water supplies and aquifer response have been characterized by water year type based on DWR's Sacramento Valley Water Year Index, which classifies water years as wet, above normal, below normal, dry, or critical based on Sacramento River unimpaired flows.

As described previously, water years 2000 to 2018 were selected to provide a minimum of 10 years across a range of hydrologic conditions. This period includes relatively wet years in 2006, 2011, and 2017 as well as dry conditions between 2007 and 2009 and between 2013 and 2015.

Information utilized to develop the historical water budget include:

- Analysis Period – Water years 2000 to 2018.
- Stream Inflows – Inflows of surface water into the basin were estimated based on stream gage data from USGS and DWR where available (e.g., Feather River and South Honcut Creek). For un-gaged streams, inflows were estimated using the Natural Resources Conservation Service (NRCS) rainfall runoff method applied at the watershed scale, considering precipitation timing and amount, soil characteristics, and other factors. Additional detail describing stream inflows is described in the BBGM model report (BCDWRC, 2021).

- Land Use – Land use characteristics for agricultural, native, and urban (including rural residential) lands were estimated annually based on a combination of DWR land use surveys and county agricultural commissioner cropping reports. DWR land use data were available for 1994, 1999, 2004, 2011, 2014, 2015, and 2016. Additional detail describing the development of land use estimates can be found in the BBGM model report (BCDWRC, 2021).
- Agricultural Water Demand – Agricultural irrigation demands were estimated using the BBGM, which simulates crop growth and water use on a daily basis, considering crop type, evapotranspiration, root depth, soil characteristics, and irrigation practices. For ponded land uses (rice and managed wetlands), pond depths and pond drainage are also considered to simulate demands.
- Urban and Industrial Water Demand[15] – Urban and industrial demands were estimated based on a combination of pumping data provided directly by water suppliers (e.g., Cal Water) and estimates of population and per capita water use over time. Additional detail describing the development of urban demand estimates can be found in the BBGM model report (BCDWRC, 2021).
- Surface Water Diversions – Surface water diversions were estimated based on a combination of reported diversions by water suppliers (e.g., SFWPA) and, in some cases, agricultural water demand estimates for areas known to receive surface water but for which reported diversion data were not available.
- Groundwater Pumping – For urban water suppliers, historical pumping was estimated from reported pumping volumes over time. Pumping to meet agricultural and managed wetlands demands was estimated within the BBGM by first estimating the total demand and then subtracting surface water deliveries to calculate estimated groundwater pumping required to meet the remaining demand.

2.3.3.2 Current Conditions

The current conditions water budget was developed as a baseline to evaluate projected water budgets considering future conditions and is based on 50 years of hydrology along with the most recent information describing land use, urban demands, and surface water supplies. The 50-year hydrologic period was selected rather than the most recent year for which historical water budget information is available to allow for direct comparison of potential future conditions to current conditions. The use of a representative hydrologic period containing wet and dry cycles supports the understanding of uncertainty in groundwater conditions over time, establishment of SMC, and development of projects and management actions to avoid undesirable results.

The current water budget estimates current inflows, outflows, and change in storage for the basin using 50 years of representative hydrology and the most recent water supply, water demand, and land use information.

[15] Current estimates of industrial water use not supplied by urban water suppliers have not been explicitly included at this time and are identified as a data gap that could be filled as part of future GSP updates. These water uses are small relative to other water uses (i.e., agricultural and urban) and tend to be non-consumptive in nature. Additionally, future refinements of the BBGM to incorporate rural residential demands may also be made; these demands were estimated as part of the 2016 Water Inventory and Analysis and are also small relative to other uses.

Information utilized to develop the current conditions baseline water budget include:

- Analysis Period – 50-years of hydrology were utilized representing the period from 1971 to 2018, with 2004 and 2005 repeated following 2018.
- Stream Inflows – Inflows of surface water into the basin were estimated utilizing the same information as for the historical water budget.
- Land Use – Land use for agricultural, native, and urban (including rural residential) lands was estimated annually using the most recent land use information. Specifically, 2015 and 2016 land use were mapped to the 50-year analysis period, with 2015 land use applied to extreme dry years and 2016 land use applied to all other years. Extreme dry years were identified based on April to July inflows of the Feather River to Lake Oroville. April to July runoff to the Feather River is believed to be a reasonable indicator of surface water supplies within the basin, which are primarily associated with the Feather River.
- Agricultural Water Demand – Agricultural irrigation demands were estimated using the BBGM, in the same manner as the historical water budget.
- Urban and Industrial Water Demand – Urban and industrial demands were estimated based on recent demands. Specifically, average demands for the period 2016 to 2018 were assumed.
- Surface Water Diversions – Similar to land use, surface water diversions were estimated based on 2015 and 2016 conditions, with 2015 diversion assumed for extreme dry years as discussed above.
- Groundwater Pumping – Pumping to meet urban demands was estimated based on average 2016 to 2018 demands, as described above. Pumping to meet agricultural and managed wetlands demands was estimated using the BBGM as described previously for the historical water budget.

2.3.3.3 Future Conditions

Three projected baseline water budget scenarios were developed considering a range of future conditions that may occur. The scenarios consider future planned land use changes (i.e., development) based on the Butte County 2030 General Plan, along with changes in climate, including precipitation, surface water inflows, and evapotranspiration. These baselines provide information regarding changes in basin conditions (e.g., groundwater storage) that may occur in the future over a series of wet and dry cycles.

The projected water budget estimates potential future inflows, outflows, and change in storage for the basin using 50-years of representative hydrology (including modifications based on climate change projections), the most recent water supply and water demand, and planned future land use information.

Information utilized to develop the future conditions baseline water budgets includes:

- Analysis Period – 50-years of hydrology were utilized representing the period from 1971 to 2018, with 2004 and 2005 repeated following 2018.
- Stream Inflows:

- Future Conditions, No Climate Change – Inflows of surface water into the basin were estimated utilizing the same information as for the historical water budget.
- Future Conditions, 2030 Climate Change – Precipitation, evapotranspiration, and surface water supplies were adjusted to reflect climate change based on the 2030 Central Tendency climate change datasets provided by DWR to support GSP development.
    - For precipitation and evapotranspiration, monthly change factors were applied to historical values to estimate potential future conditions.

- For streamflows, DWR estimates of stream inflows were utilized where available; for streams without direct estimates of inflows, inflows were estimated using streamflow change factors applied at the watershed scale.
- Future Conditions, 2070 Climate Change – Precipitation, evapotranspiration, and surface water supplies were adjusted to reflect climate change based on the 2070 Central Tendency climate change datasets provided by DWR to support GSP development:
    - For precipitation and evapotranspiration, monthly change factors were applied to historical values to estimate potential future conditions.
    - For streamflows, DWR estimates of stream inflows were utilized where available; for streams without direct estimates of inflows, inflows were estimated using streamflow change factors applied at the watershed scale.

- Land Use – Land use for agricultural, native, and urban (including rural residential) lands was estimated annually using the most recent land use information and modified based on planned development according to the Butte County 2030 General Plan. Specifically, 2015 and 2016 land use were mapped to the 50-year analysis period, with 2015 land use applied to extreme dry years and 2016 land use applied to all other years. 2015 and 2016 land use data were modified to reflect planned development, generally resulting in an increase in urban land through development of previously undeveloped (i.e., native) lands:
- Future Conditions, No Climate Change – Land use was assumed to be similar to the current conditions water budget scenario.
- Future Conditions, 2030 Climate Change – 2015 and 2016 land use data were mapped to the 50-year analysis period considering 2030 central tendency climate change projections, with 2015 land use used for extreme dry years and 2016 land use used for all other years.
- Future Conditions, 2070 Climate Change – 2015 and 2016 land use data were mapped to the 50-year analysis period considering 2070 central tendency climate change projections, with 2015 land use used for extreme dry years and 2016 land use used for all other years.

- Agricultural Water Demand – Agricultural irrigation demands were estimated using the BBGM, in the same manner as the historical water budget.
- Urban and Industrial Water Demand – Urban and industrial demands were estimated based projected urban demands. Specifically, future urban demands were estimated

based on preliminary draft demand estimates provided by Cal Water, a primary urban supplier in the basin, as part of 2020 UWMP development.

- Surface Water Diversions – Similar to land use, surface water diversions were estimated based on 2015 and 2016 conditions, with 2015 diversions assumed for extreme dry years and 2016 diversions assumed for other years. Extreme dry years are identified based on April to July unimpaired Feather River inflows into Lake Oroville.
- Groundwater Pumping – Pumping to meet urban demands was estimated based on draft projections from UWMPs currently under development, as described above. Pumping to meet agricultural and managed wetlands demands was estimated using the BBGM as described previously for the historical water budget.

2.3.4 Water Budget Estimates

As described previously, water budget estimates were developed using the BBGM. Primary components of the land and surface water system water budget include the following:

- Inflows:
  - Surface Water Inflows – Inflows at the land surface through streams, canals, or other waterways. These inflows may also include overland flow from upslope areas outside of the basin. Although interactions with streams along the boundary of the basin (i.e., diversions and stream-aquifer interaction) are accounted for, the flow in the stream is not considered an inflow to the basin. Inflows from the Feather River, which traverses the basin, are accounted for explicitly.
  - Precipitation – Rainfall intercepting the ground surface within the basin boundary.
  - Groundwater pumping – Extraction of groundwater to meet agricultural, urban, managed wetlands, or other beneficial uses.
  - Stream Accretions – Gains in streamflow from shallow groundwater occurring when the water level in the aquifer adjacent to the stream is greater than the water level in the stream.
- Outflows:
  - Surface Water Outflows – Outflows at the land surface through streams, canals, or other waterways. These outflows may also include overland flow to downslope areas outside of the basin.
  - Evapotranspiration – Consumptive use of water including both evaporation and transpiration components from all land uses.
  - Deep Percolation – Recharge of the groundwater system through the vertical movement of precipitation and applied irrigation water below the root zone.
  - Seepage (Also referred to as Losses or Leakage) – Recharge of the groundwater system from streams, canals, or other water bodies.
- Change in Storage – Changes in soil moisture storage within the upper several feet of soil in the root zone, as well as changes in storage in surface water bodies within the

basin. These changes are generally negligible on an annual basis but vary over the course of a year based on precipitation patterns and other factors.

Primary components of the groundwater system water budget include the following:

- Inflows:
  - Deep Percolation – Described above.
  - Subsurface Inflows – Groundwater inflows from adjacent basins or from the foothill area north of the Wyandotte Creek Subbasin.
  - Seepage – Described above.
- Outflows:
  - Groundwater Pumping – Described above.
  - Subsurface Outflows – Groundwater outflows to adjacent basins.
  - Stream Accretions – Described above.
- Change in Storage – Changes in water storage in the aquifer system. These changes tend to be large compared to changes in root zone soil moisture storage and can vary substantially from year to year.

Many components of the water budget can be estimated based on measured data (e.g., precipitation, diversions, evapotranspiration, etc.) and are used to develop inputs to the BBGM to support water budget development. Other components are more difficult to measure or do not have measured values readily available (e.g., deep percolation, subsurface flows, groundwater pumping, surface water-groundwater interaction, etc.) and are estimated using the BBGM. Additional detail describing the BBGM is available in (BCDWRC, 2021).

Average annual water budget estimates for the historical water budgets and for the current and projected water budget scenarios are summarized in Table 2-5 for the land and surface water system and in Table 2-6 for the groundwater system. Additional information and discussion regarding the water budgets is provided in the following subsections. It is anticipated that the water budgets will be refined and updated over time as part of GSP implementation in the basin.

Table 2-5: Water Budget Summary: Land and Surface Water System (version BBGM v.1.00)

Component	Historical (AFY)	Current (AFY)	Future, No Climate Change (AFY)	Future, 2030 Climate Change (AFY)	Future, 2070 Climate Change (AFY)
Inflows					
Surface Water Inflows	**1,067,300**	**923,900**	**924,000**	**986,500**	**1,036,300**
Outside Diversions	5,700	5,600	5,700	5,700	5,700
Feather River	*1,019,200*	*874,500*	*874,500*	*933,800*	*981,400*
North Honcut Creek	*41,800*	*43,100*	*43,100*	*46,200*	*48,400*
Precipitation Runoff from Upslope Lands	*500*	*600*	*600*	*700*	*700*

Component	Historical (AFY)	Current (AFY)	Future, No Climate Change (AFY)	Future, 2030 Climate Change (AFY)	Future, 2070 Climate Change (AFY)
Applied Water Return Flows from Upslope Lands	*100*	*100*	*100*	*100*	*100*
Precipitation	**130,800**	**136,100**	**136,100**	**141,500**	**144,900**
Groundwater Pumping	**47,100**	**43,100**	**45,000**	**46,600**	**48,700**
Agricultural	*39,300*	*36,200*	*35,800*	*37,400*	*39,300*
Urban and Industrial	700	500	2,800	2,700	2,700
Managed Wetlands	*7,100*	*6,400*	*6,400*	*6,500*	*6,700*
Stream Gains from Groundwater	**36,300**	**32,000**	**29,500**	**28,500**	**26,600**
Total Inflow	***1,281,500***	***1,135,100***	***1,134,600***	***1,203,100***	***1,256,500***
Outflows					
Evapotranspiration	**87,100**	**82,500**	**81,500**	**84,100**	**86,500**
Agricultural	*43,800*	*41,300*	*40,800*	*42,200*	*44,000*
Urban and Industrial	*8,600*	*8,700*	*11,800*	*12,000*	*12,200*
Managed Wetlands	*5,400*	*4,500*	*4,500*	*4,700*	*4,800*
Native Vegetation	*29,300*	*28,000*	*24,400*	*25,200*	*25,500*
Canal Evaporation	*0*	*0*	*0*	*0*	*0*
Deep Percolation	**70,700**	**69,600**	**67,300**	**69,900**	**70,700**
Precipitation	*47,000*	*48,800*	*45,300*	*49,100*	*47,000*
Applied Surface Water	*6,200*	*4,800*	*4,500*	*4,800*	*4,800*
Applied Groundwater	*17,500*	*16,000*	*17,500*	*16,000*	*18,900*
Seepage	**10,000**	**9,700**	**9,900**	**10,700**	**11,900**
Streams	*4,100*	*4,900*	*5,100*	*5,900*	*7,100*
Lakes	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*
Canals and Drains	*2,300*	*1,200*	*1,200*	*1,200*	*1,200*
Surface Water Outflows	**1,113,500**	**973,200**	**975,600**	**1,038,600**	**1,087,400**
Precipitation Runoff	*17,800*	*19,200*	*21,600*	*23,200*	*24,800*
Applied Surface Water Return Flows	*1,700*	*1,200*	*1,300*	*1,300*	*2,600*
Applied Groundwater Return Flows	*3,300*	*2,700*	*3,100*	*3,100*	*4,100*
Streams	*1,090,700*	*950,100*	*949,600*	*1,011,000*	*1,055,900*
Total Outflow	***1,281,300***	***1,135,000***	***1,134,300***	***1,203,300***	***1,256,500***
Change in Storage (Inflow - Outflow)	***200***	***100***	***300***	***-200***	***0***

Note: AFY = acre-feet per year
Totals are the sum of numbers in bold.

Table 2-6: Water Budget Summary: Groundwater System (version BBGM v.1.00)

Component	Historical (AFY)	Current (AFY)	Future, No Climate Change (AFY)	Future, 2030 Climate Change (AFY)	Future, 2070 Climate Change (AFY)
Inflows					
Subsurface Inflows	**24,900**	**22,500**	**22,500**	**22,100**	**22,200**
Butte Subbasin	*15,200*	*13,300*	*13,300*	*12,900*	*13,000*
North Yuba Subbasin	*2,700*	*2,500*	*2,500*	*2,300*	*2,100*
Sutter Subbasin	*700*	*500*	*500*	*600*	*800*
Vina Subbasin	*0*	*0*	*0*	*0*	*0*
Foothill Area	*6,300*	*6,200*	*6,100*	*6,300*	*6,300*
Deep Percolation	**70,800**	**69,600**	**67,300**	**69,900**	**70,700**
Precipitation	*47,000*	*48,800*	*45,300*	*46,900*	*47,000*
Applied Surface Water	*6,200*	*4,800*	*4,500*	*4,700*	*4,800*
Applied Groundwater	*17,500*	*16,000*	*17,500*	*18,300*	*18,900*
Seepage	**10,000**	**9,700**	**9,900**	**10,700**	**11,900**
Streams[1]	*4,100*	*4,900*	*5,100*	*5,900*	*7,100*
Lakes[2]	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*
Canals and Drains[3]	*2,300*	*1,200*	*1,200*	*1,200*	*1,200*
Total Inflow	***105,700***	***101,800***	***99,700***	***102,700***	***104,800***
Outflows					
Subsurface Outflows	**26,000**	**26,700**	**25,600**	**27,600**	**29,900**
Butte Subbasin	*14,000*	*14,800*	*13,700*	*14,400*	*14,900*
North Yuba Subbasin	*10,500*	*10,500*	*10,700*	*11,800*	*13,600*
Sutter Subbasin	*400*	*300*	*300*	*300*	*200*
Vina Subbasin	*200*	*300*	*200*	*300*	*300*
Foothill Area	*900*	*800*	*700*	*800*	*900*
Groundwater Pumping	**47,100**	**43,000**	**44,900**	**46,600**	**48,700**
Agricultural	*39,300*	*36,200*	*35,800*	*37,400*	*39,300*
Urban and Industrial	*700*	*500*	*2,800*	*2,700*	*2,700*
Managed Wetlands	*7,100*	*6,400*	*6,400*	*6,500*	*6,700*
Stream Gains from Groundwater	**36,300**	**32,000**	**29,500**	**28,500**	**26,600**
Total Outflow	***109,400***	***101,700***	***100,000***	***102,700***	***105,200***
Change in Storage (Inflow - Outflow)	***-3,700***	***100***	***-300***	***0***	***-400***

Notes:
[1] Feather River and North Honcut Creek
[2] Thermalito Afterbay

Component	Historical (AFY)	Current (AFY)	Future, No Climate Change (AFY)	Future, 2030 Climate Change (AFY)	Future, 2070 Climate Change (AFY)
[3] SFWPA Totals are the sum of numbers in bold.					

2.3.4.1 Historical Conditions

The historical water budget provides a foundation for how the basin has behaved historically, including insight into historical groundwater conditions (e.g., observed water levels). Also, in accordance with the GSP Regulations, the historical water budget covers a period of at least 10 years (19-year period from 2000 to 2018), is used to evaluate the availability and reliability of historical surface water supplies, and provides insight into the ability to operate the basin within the sustainable yield. The historical analysis period experienced somewhat less precipitation than the long-term average and included historic drought conditions from approximately 2007 to 2015.[16]

Average annual inflows to and outflows from the basin for the historical land and surface water system water budget were estimated to be 1.28 million acre-feet (MAF) per year. Average annual values were presented previously in Table 2-5 and are shown graphically in Figure 2-35.

Primary inflows to the land and surface water system include surface water inflows (1,067 thousand acre-feet per year [TAF/year]), precipitation (131 TAF/year), stream gains from groundwater (i.e., accretions) (36 TAF/year), and groundwater pumping (47 TAF/year). Surface water inflows consist primarily of the Feather River, which traverses the basin, as well as inflows from Honcut Creek and overland runoff of precipitation and applied water from upslope lands.

Primary outflows from the land and surface water system include surface water outflows (1,113 TAF/year), evapotranspiration (87 TAF/year), deep percolation (71 TAF/year), and stream losses (also referred to as seepage) (10 TAF/year). Surface water outflows include outflows through the Feather River and Honcut Creek, as well as overland runoff of precipitation and applied water to downslope lands. Evapotranspiration is primarily from agricultural lands but also from native vegetation, urban and industrial lands, and managed wetlands. Deep percolation is primarily from precipitation, but also from applied water. Stream losses include a combination of seepage from canals and drains, stream seepage, and seepage from Thermalito Afterbay.

The average annual change in storage in the land and surface water system is negligible due to similar soil moisture content in the root zone, on average, across water years, and limited storage capacity exists in surface water bodies within the basin.

Additional details describing the historical land and surface water system water budget are provided in Appendix 2-A.

[16] For the 2000 to 2018 period, mean annual precipitation was 26.7 inches, compared to 23.1 inches for the 2007 to 2015 period.

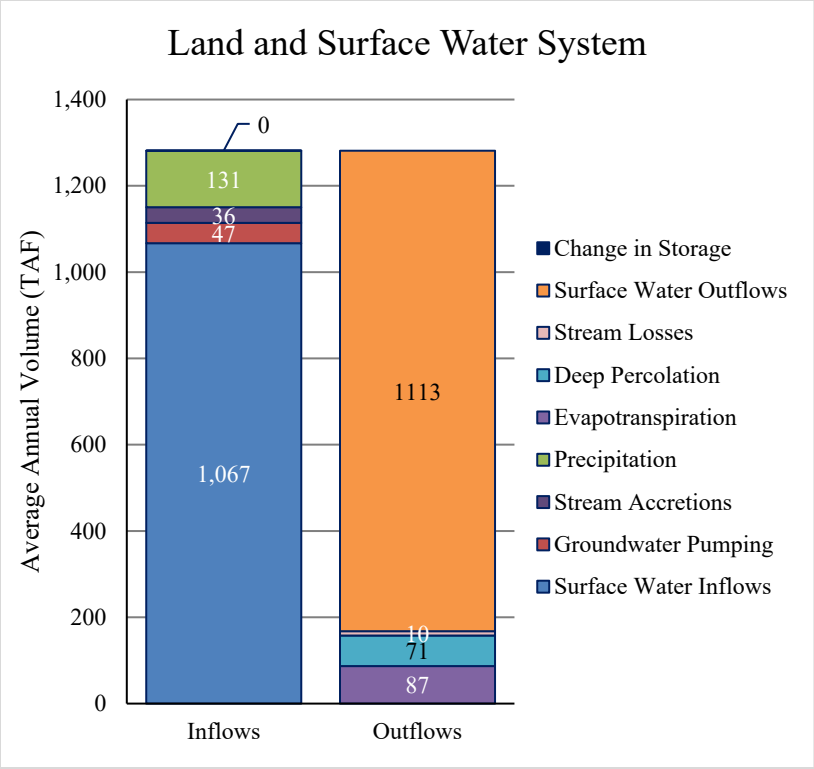


Figure 2-35: Average Annual Historical Land and Surface Water System Water Budget (version BBGM v.1.00)

Average annual inflows to and outflows from the groundwater system were estimated to be 106 TAF and 109 TAF, respectively, with an average decrease in groundwater storage of 4 TAF per year during the historical simulation period. Average annual values were presented previously in Table 2-6 and are shown graphically in Figure 2-36.

Inflows to the groundwater system include deep percolation (71 TAF/year); subsurface inflows from the Butte, North Yuba, Sutter, and Vina subbasins and from the foothill area (25 TAF/year); and stream losses (10 TAF/year). Outflows from the groundwater system include groundwater pumping (47 TAF/year); subsurface outflows to the Butte, North Yuba, Sutter, and Vina subbasins and to the foothill area (26 TAF/year); and stream gains from groundwater (36 TAF/year).

Additional details describing the historical groundwater system water budget are provided in Appendix 2-A.

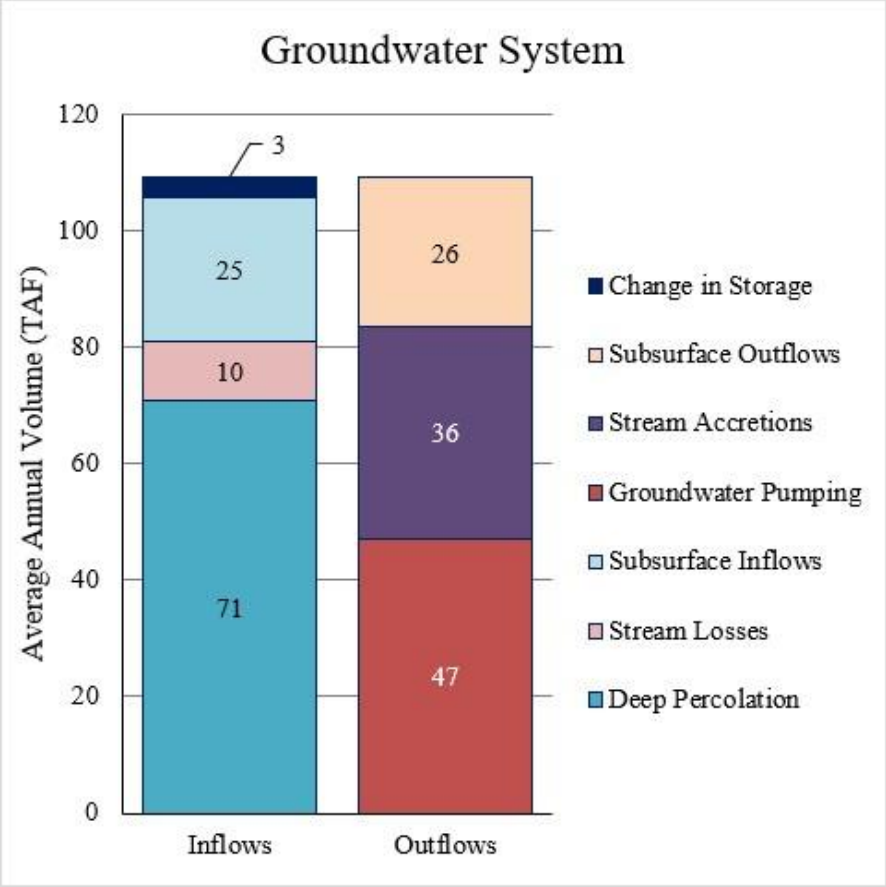


Figure 2-36: Average Annual Historical Groundwater System Water Budget (version BBGM v.1.00)

Historical water supplies and change in groundwater storage are summarized by water year type in Table 2-7 based on the Sacramento Valley Water Year Index. Between 2000 and 2018, there were three wet years, three above normal years, five below normal years, five dry years, and three critical years. Historical surface water deliveries were similar across year types, while groundwater pumping was greatest in critical years and least in wet years. Historically, groundwater storage in the basin has tended to increase in wet years and to decrease in above normal, below normal, dry, and critical years, with reductions in storage in above normal and below normal years less than reductions in dry and critical years. Surface water supplies are relatively reliable in the basin but currently represent only about 20% of total water supplies.

Table 2-7: Historical Water Supplies and Change in Groundwater Storage by Hydrologic Water Year Type (version BBGM v.1.00)

Water Year Type	Surface Water Deliveries (AFY)	Groundwater Pumping (AFY)	Total Supply (AFY)	Change in Groundwater Storage (AFY)
Wet	10,500	38,700	49,200	37,300
Above Normal	12,500	45,200	57,700	-2,000
Below Normal	11,100	45,400	56,500	-3,500
Dry	13,300	50,300	63,600	-20,300
Critical	9,900	55,000	64,900	-18,900

Availability or Reliability of Historical Surface Water Supplies

As indicated in Table 2-7, historical surface water supplies vary somewhat based on water year type with the primary water supply in the basin being groundwater. The primary source of surface water in the basin is the Feather River. Surface water supplies are relatively reliable in the basin and represent approximately 20% of total water supplies. Potential effects of climate change on surface water reliability are further evaluated as part of the projected water budgets in the following sections.

Suitability of Tools and Methods for Planning

The water budgets presented herein have been developed using the best available information and best available science and structured in a manner consistent with the HCM of the basin. The BBGM, which is used to organize information for the water budgets, develop water budget scenarios, and perform water budget calculations, is currently the best available tool and is suitable for GSP development for the Wyandotte Creek Subbasin. The BBGM has been developed over the past several decades and updated over time to use updated model code, updated datasets, and updated input parameters through a series of efforts. Refinements to the BBGM have been made through extensive engagement with local stakeholders as part of several past efforts. It is anticipated that the BBGM will may be updated and refined in the future as part of GSP implementation.

2.3.4.2 Current Conditions

The current conditions baseline water budget provides a foundation to understand the behavior of the basin considering current land use and urban demands over a broad range of hydrologic conditions as well as a basis for evaluating how groundwater conditions may change in the future based on comparison of water budget results to projected water budgets presented in the following section. A 50-year hydrologic period was selected, rather than a single, recent year to improve the basis for estimation of sustainable yield under current conditions.

Average annual inflows to and outflows from the basin for the current conditions land and surface water system baseline water budget were estimated to be 1.14 MAF per year. Average annual values were presented previously in Table 2-5 and are shown graphically in Figure 2-37.

Primary inflows to the land and surface water system include surface water inflows (924 TAF/year), precipitation (136 TAF/year), stream gains from groundwater (i.e., accretions) (32 TAF/year), and groundwater pumping (43 TAF/year). Surface water inflows consist primarily of

the Feather River, which traverses the basin, as well as inflows from Honcut Creek and overland runoff of precipitation and applied water from upslope lands.

Primary outflows from the land and surface water system include surface water outflows (973 TAF/year), evapotranspiration (83 TAF/year), deep percolation (70 TAF/year), and stream losses (also referred to as seepage) (10 TAF/year). Surface water outflows include outflows through the Feather River and Honcut Creek, as well as overland runoff of precipitation and applied water to downslope lands. Evapotranspiration is primarily from agricultural lands but also from native vegetation, urban and industrial lands, and managed wetlands. Deep percolation is primarily from precipitation, but also from applied water. Stream losses include a combination of seepage from canals and drains, stream seepage, and seepage from Thermalito Afterbay.

The average annual change in storage in the land and surface water system is negligible due to similar soil moisture content in the root zone, on average, across water years, and limited storage capacity exists in surface water bodies within the basin.

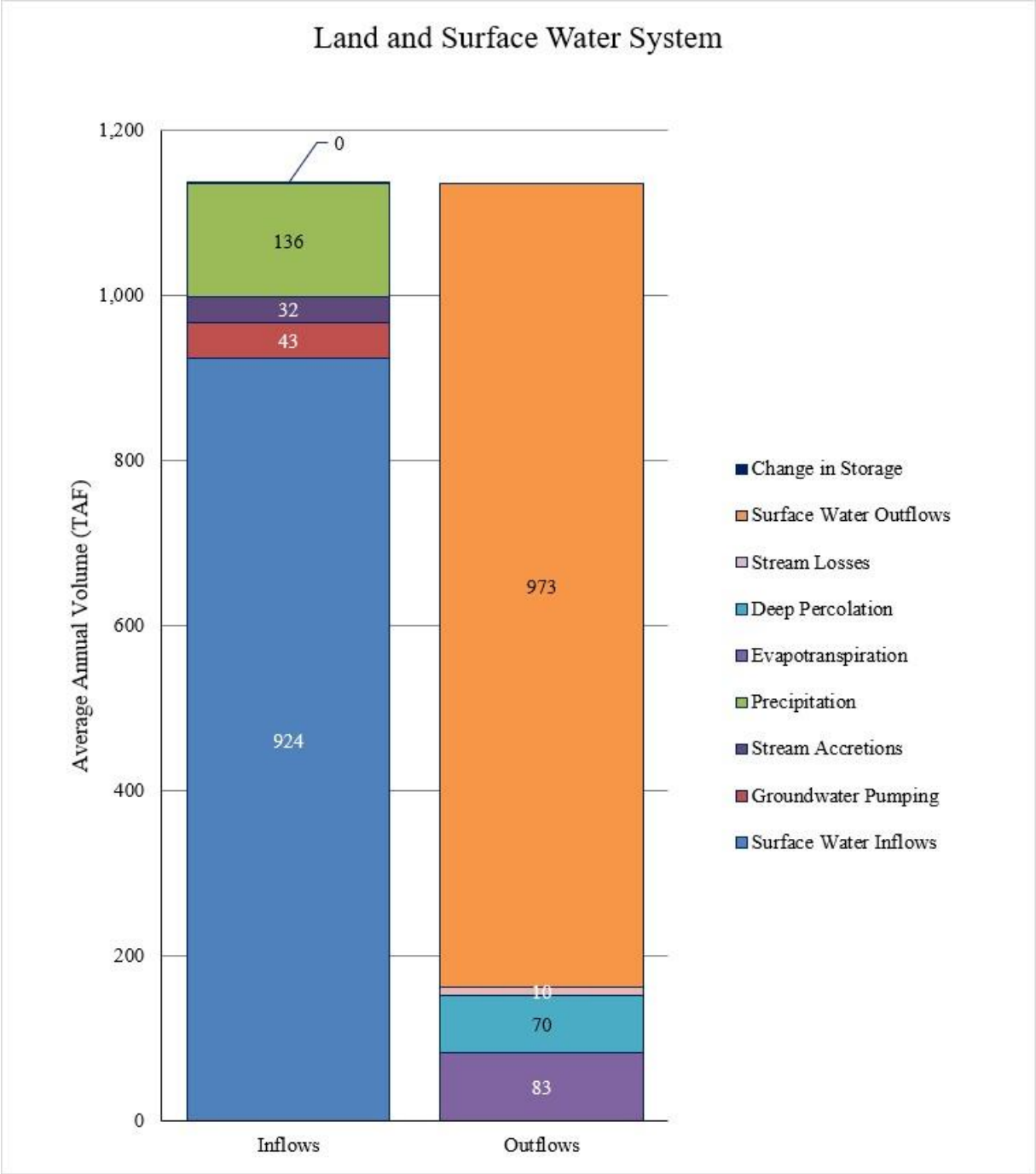


Figure 2-37: Average Annual Current Conditions Land and Surface Water System Water Budget (version BBGM v.1.00)

Average annual inflows to and outflows from the groundwater system were estimated to be 102 TAF, with limited average change in groundwater storage during the current conditions baseline simulation period. Average annual values were presented previously in Table 2-6 and are shown graphically in Figure 2-38.

Inflows to the groundwater system include deep percolation (70 TAF/year); subsurface inflows from the Butte, North Yuba, Sutter, and Vina subbasins and from the foothill area (22

TAF/year); and stream losses (10 TAF/year). Outflows from the groundwater system include groundwater pumping (43 TAF/year); subsurface outflows to the Butte, North Yuba, Sutter, and Vina subbasins and to the foothill area (26 TAF/year); and stream gains from groundwater (32 TAF/year).

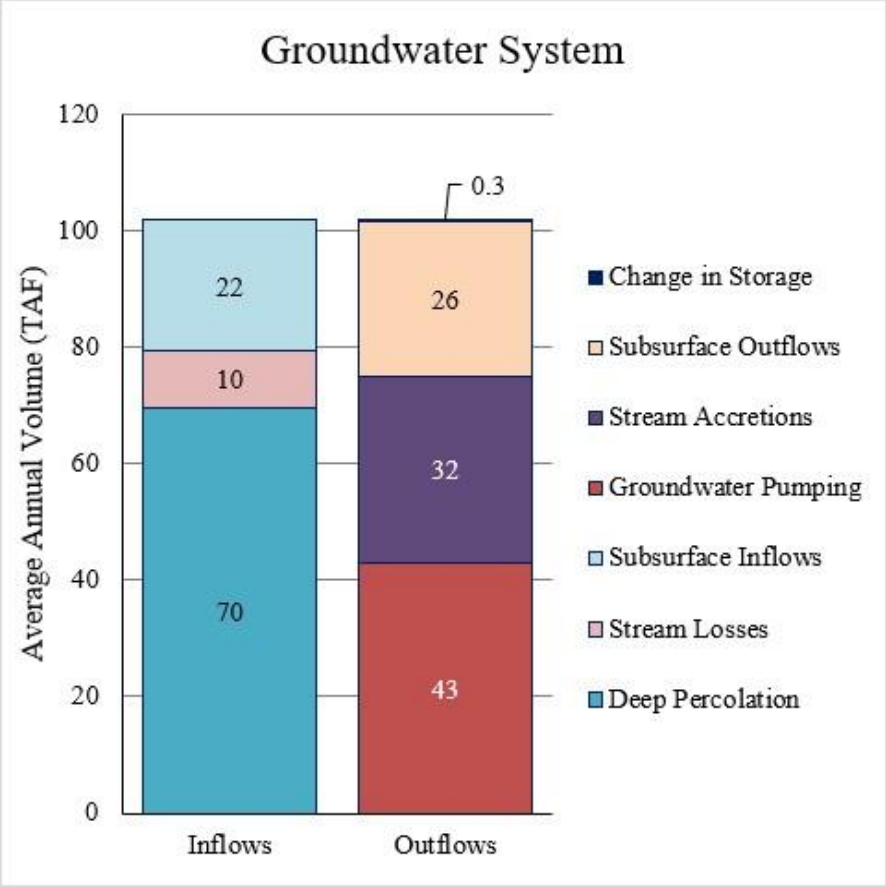


Figure 2-38: Average Annual Current Conditions Groundwater System Water Budget (version BBGM v.1.00)

2.3.4.3 Future Conditions

Three projected water budgets were developed for the basin to provide baseline scenarios representing potential future conditions considering planned development under the Butte County 2030 General Plan and climate change centered around 2030 and 2070 based on central tendency climate change datasets provided by DWR. The projected water budget scenarios provide a foundation to understand the behavior of the basin considering potential land use and urban demands over a broad range of hydrologic conditions, modified based on climate change projections). Use of a 50-year hydrologic period provides a basis for estimation of sustainable yield under potential future conditions.

Future Conditions, no Climate Change

Average annual inflows to and outflows from the basin for the future conditions without climate change projected land and surface water system baseline water budget were estimated to be 1.13 MAF per year. Average annual values were presented previously in Table 2-5 and are shown graphically in Figure 2-39.

Primary inflows to the land and surface water system include surface water inflows (924 TAF/year), precipitation (136 TAF/year), stream gains from groundwater (i.e., accretions) (29 TAF/year), and groundwater pumping (45 TAF/year). Surface water inflows consist primarily of the Feather River, which traverses the basin, as well as inflows from Honcut Creek and overland runoff of precipitation and applied water from upslope lands.

Primary outflows from the land and surface water system include surface water outflows (976 TAF/year), evapotranspiration (82 TAF/year), deep percolation (67 TAF/year), and stream losses (also referred to as seepage) (10 TAF/year). Surface water outflows include outflows through the Feather River and Honcut Creek, as well as overland runoff of precipitation and applied water to downslope lands. Evapotranspiration is primarily from agricultural lands but also from native vegetation, urban and industrial lands, and managed wetlands. Deep percolation is primarily from precipitation, but also from applied water. Stream losses include a combination of seepage from canals and drains, stream seepage, and seepage from Thermalito Afterbay.

The average annual change in storage in the land and surface water system is negligible due to similar soil moisture content in the root zone, on average, across water years, and limited storage capacity exists in surface water bodies within the basin.

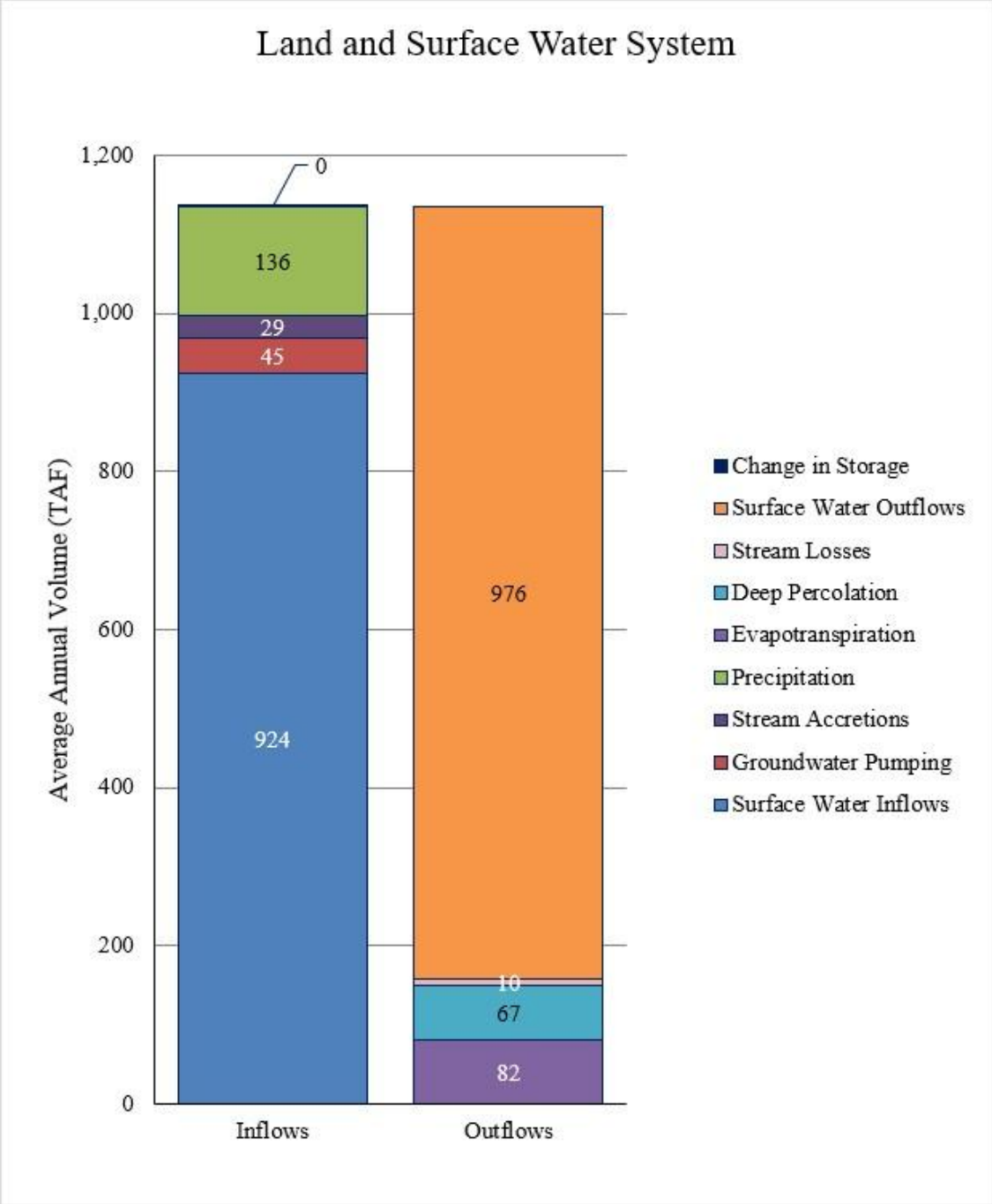


Figure 2-39: Average Annual Future Conditions without Climate Change Land and Surface Water System Water Budget (version BBGM v.1.00)

Average annual inflows to and outflows from the groundwater system were estimated to be 100 TAF, with limited average change in groundwater storage during the future conditions without climate change baseline simulation period. Average annual values were presented previously in Table 2-6 and are shown graphically in Figure 2-40.

Inflows to the groundwater system include deep percolation (67 TAF/year); subsurface inflows from the Butte, North Yuba, Sutter, and Vina subbasins and from the foothill area (22 TAF/year); and stream losses (10 TAF/year). Outflows from the groundwater system include

groundwater pumping (45 TAF/year); subsurface outflows to the Butte, North Yuba, Sutter, and Vina subbasins and to the foothill area (25 TAF/year); and stream gains from groundwater (29 TAF/year).

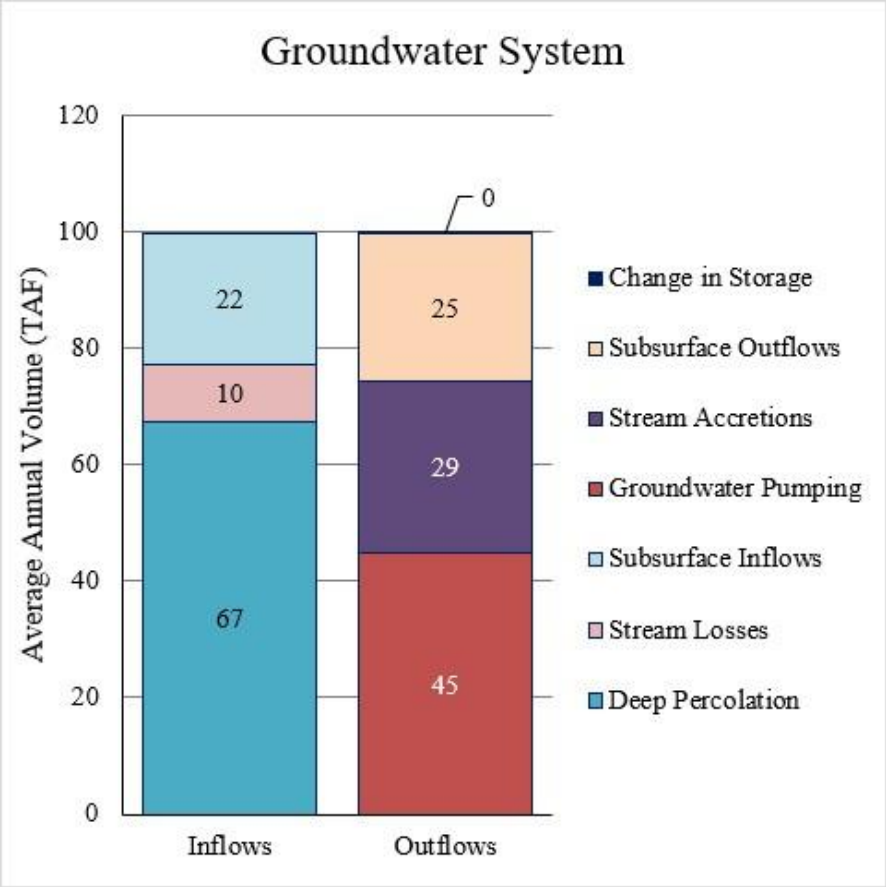


Figure 2-40: Average Annual Future Conditions without Climate Change Groundwater System Water Budget (version BBGM v.1.00)

Future Conditions, 2030 Climate Change

Average annual inflows to and outflows from the basin for the future conditions with 2030 climate change projected land and surface water system baseline water budget were estimated to be 1.20 MAF per year. Average annual values were presented previously in Table 2-5 and are shown graphically in Figure 2-41.

Primary inflows to the land and surface water system include surface water inflows (986 TAF/year), precipitation (142 TAF/year), stream gains from groundwater (i.e. accretions) (29 TAF/year), and groundwater pumping (47 TAF/year). Surface water inflows consist primarily of the Feather River, which traverses the basin, as well as inflows from Honcut Creek and overland runoff of precipitation and applied water from upslope lands.

Primary outflows from the land and surface water system include surface water outflows (1,039 TAF/year), evapotranspiration (84 TAF/year), deep percolation (70 TAF/year), and stream losses (also referred to as seepage) (11 TAF/year). Surface water outflows include outflows through the Feather River and Honcut Creek, as well as overland runoff of precipitation and applied water to downslope lands. Evapotranspiration is primarily from agricultural lands but also from native vegetation, urban and industrial lands, and managed wetlands. Deep percolation is primarily

from precipitation, but also from applied water. Stream losses include a combination of seepage from canals and drains, stream seepage, and seepage from Thermalito Afterbay.

The average annual change in storage in the land and surface water system is negligible due to similar soil moisture content in the root zone, on average, across water years, and limited storage capacity exists in surface water bodies within the basin.

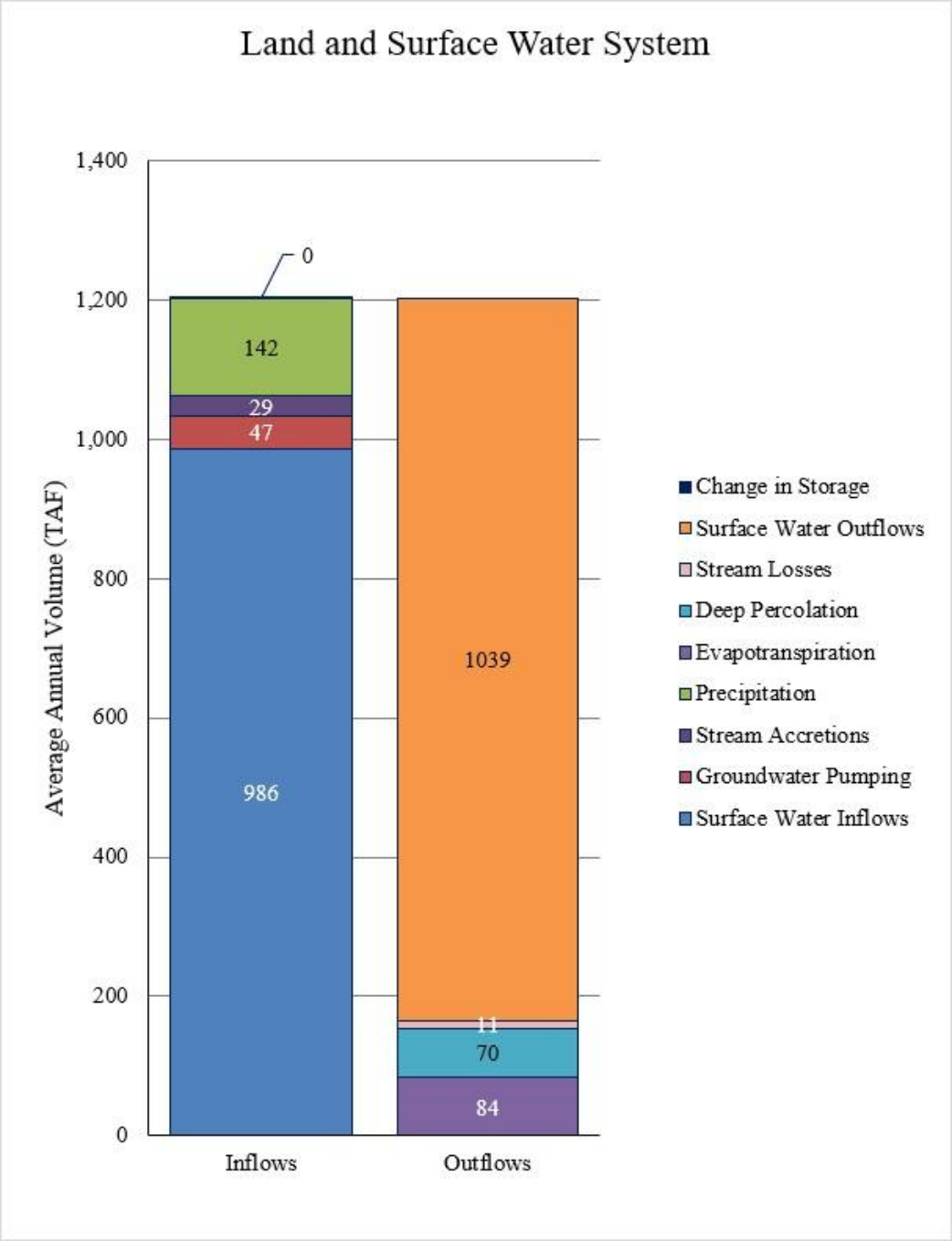


Figure 2-41: Average Annual Future Conditions with 2030 Climate Change Land and Surface Water System Water Budget (version BBGM v.1.00)

Average annual inflows to and outflows from the groundwater system were estimated to be 103 TAF, with limited average change in groundwater storage during the future conditions with 2030 central tendency climate change baseline simulation period. Average annual values were presented previously in Table 2-6 and are shown graphically in Figure 2-42.

Inflows to the groundwater system include deep percolation (70 TAF/year); subsurface inflows from the Butte, North Yuba, Sutter, and Vina subbasins and from the foothill area (22 TAF/year); and stream losses (11 TAF/year). Outflows from the groundwater system include groundwater pumping (47 TAF/year); subsurface outflows to the Butte, North Yuba, Sutter, and Vina subbasins and to the foothill area (27 TAF/year); and stream gains from groundwater (29 TAF/year).

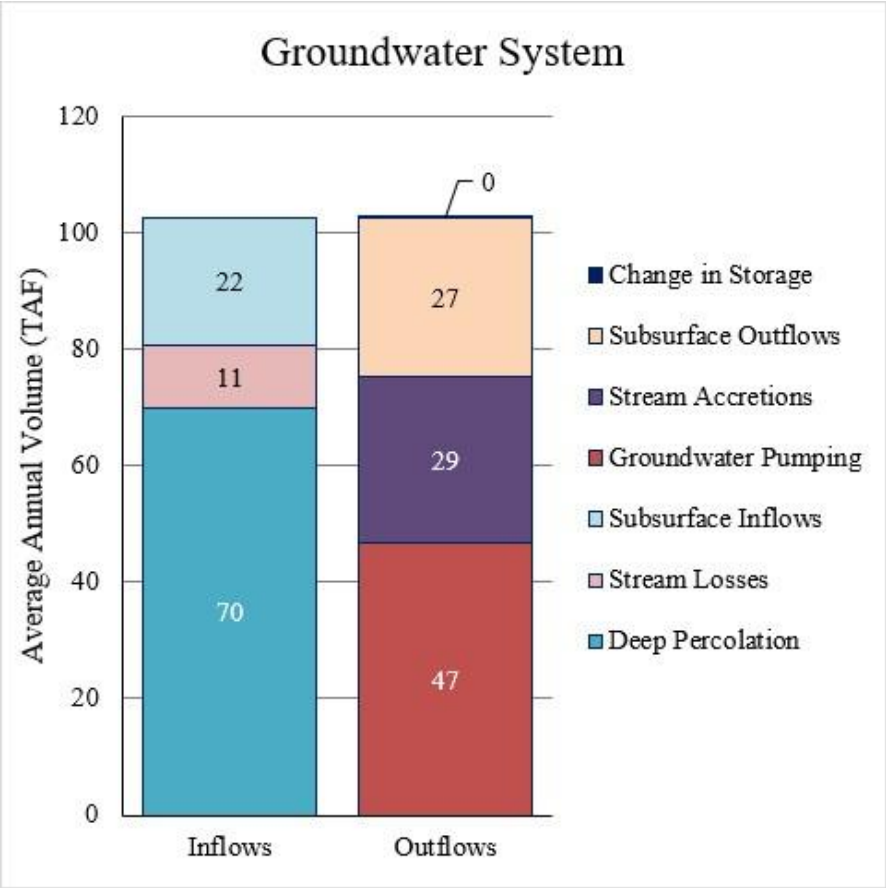


Figure 2-42: Average Annual Future Conditions with 2030 Climate Change Groundwater System Water Budget (version BBGM v.1.00)

Future Conditions, 2070 Climate Change

Average annual inflows to and outflows from the basin for the future conditions with 2070 climate change projected land and surface water system baseline water budget were estimated to be 1.26 MAF per year. Average annual values were presented previously in Table 2-5 and are shown graphically in Figure 2-43.

Primary inflows to the land and surface water system include surface water inflows (1,036 TAF/year), precipitation (145 TAF/year), stream gains from groundwater (i.e. accretions) (27 TAF/year), and groundwater pumping (49 TAF/year). Surface water inflows consist primarily of

the Feather River, which traverses the basin, as well as inflows from Honcut Creek and overland runoff of precipitation and applied water from upslope lands.

Primary outflows from the land and surface water system include surface water outflows (1,087 TAF/year), evapotranspiration (87 TAF/year), deep percolation (71 TAF/year), and stream losses (also referred to as seepage) (12 TAF/year). Surface water outflows include outflows through the Feather River and Honcut Creek, as well as overland runoff of precipitation and applied water to downslope lands. Evapotranspiration is primarily from agricultural lands but also from native vegetation, urban and industrial lands, and managed wetlands. Deep percolation is primarily from precipitation, but also from applied water. Stream losses include a combination of seepage from canals and drains, stream seepage, and seepage from Thermalito Afterbay.

The average annual change in storage in the land and surface water system is negligible due to similar soil moisture content in the root zone, on average, across water years, and limited storage capacity exists in surface water bodies within the basin.

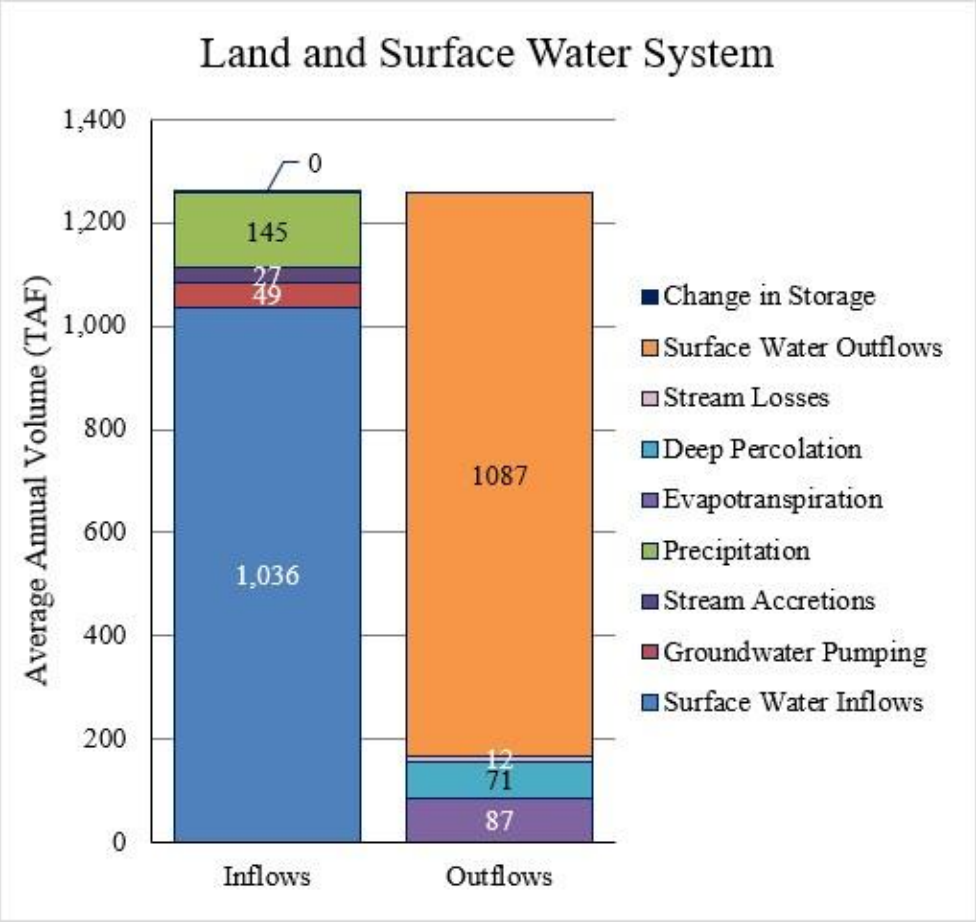


Figure 2-43: Average Annual Future Conditions with 2070 Climate Change Land and Surface Water System Water Budget (version BBGM v.1.00)

Average annual inflows to and outflows from the groundwater system were estimated to be 103 TAF, with limited average change in groundwater storage during the future conditions with 2030 central tendency climate change baseline simulation period. Average annual values were presented previously in Table 2-6 and are shown graphically in Figure 2-44.

Inflows to the groundwater system include deep percolation (71 TAF/year); subsurface inflows from the Butte, North Yuba, Sutter, and Vina subbasins and from the foothill area (22 TAF/year); and stream losses (12 TAF/year). Outflows from the groundwater system include groundwater pumping (49 TAF/year); subsurface outflows to the Butte, North Yuba, Sutter, and Vina subbasins and to the foothill area (29 TAF/year); and stream gains from groundwater (27 TAF/year).

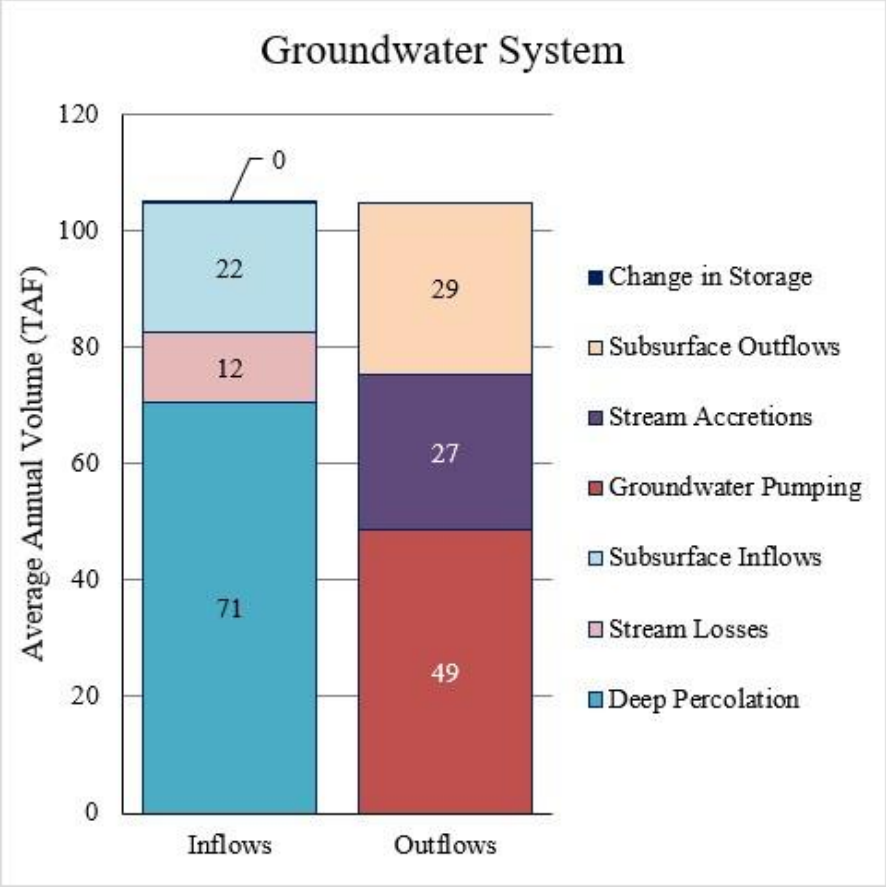


Figure 2-44: Average Annual Future Conditions with 2070 Climate Change Groundwater System Water Budget (version BBGM v.1.00)

Comparison of Water Budget Scenarios

A figure depicting cumulative change in storage for the current conditions and three future conditions baseline scenarios is provided on the following page (Figure 2-45). In the figure, the cumulative change in groundwater storage is shown for the 50-year hydrologic period. The x-axis (horizontal axis) is labeled with the historical reference year along with the corresponding water year type based on the Sacramento Valley Water Year Index. Years are identified as wet (W), above normal (AN), below normal (BN), dry (D), or critical (C).

There is a projected decrease in groundwater in storage for the future conditions scenarios relative to the current conditions scenarios likely resulting from a combination of increased urban and rural residential demands that may be met by groundwater and reduced recharge due to increased runoff on developed lands. Climate change may lead to additional reductions in storage due to increased temperatures and potential reductions in surface water availability.

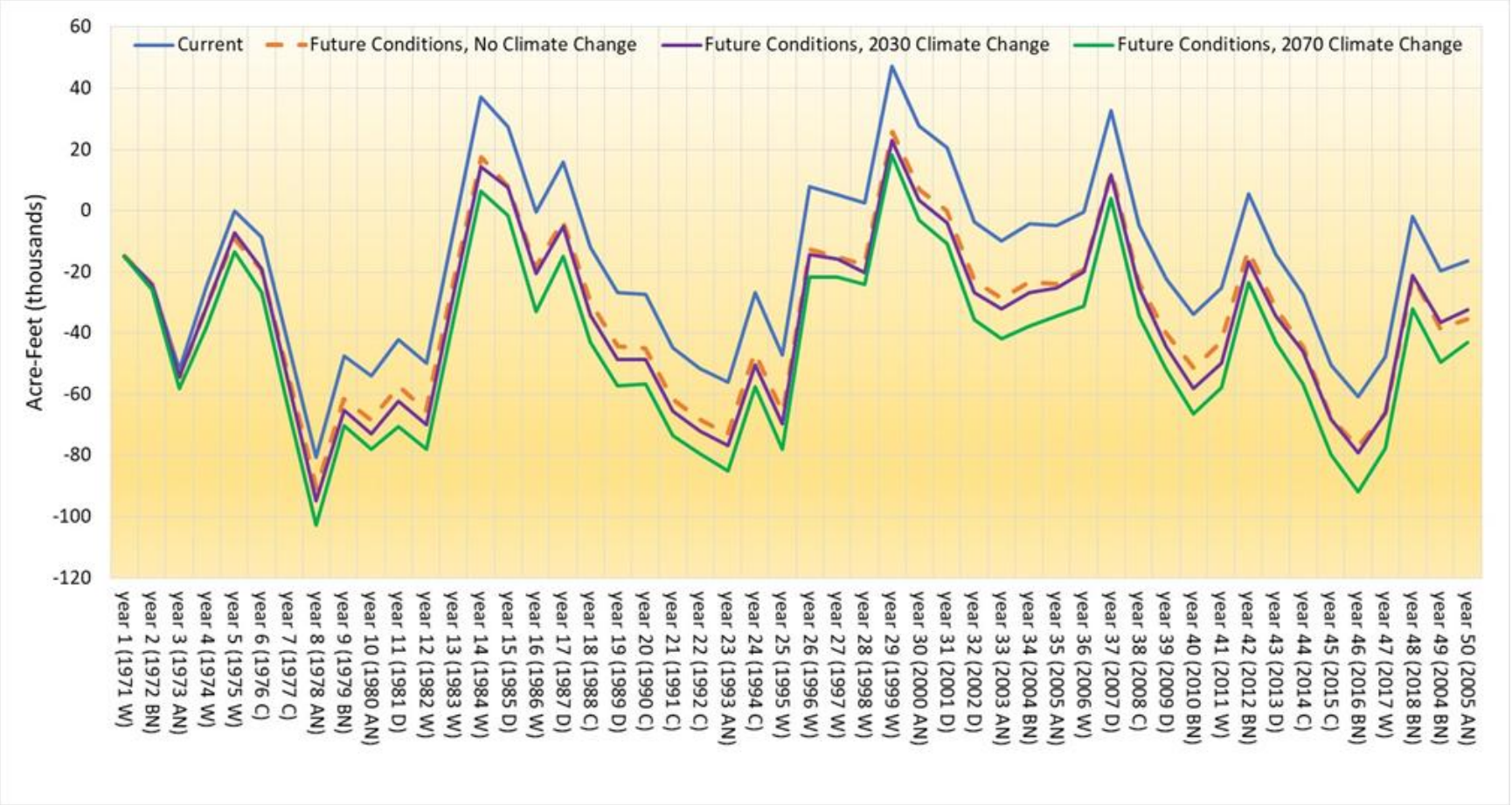


Figure 2-45: Cumulative Change in Groundwater Storage for Current and Future Conditions Baseline Scenarios (version BBGM v.1.00)

2.3.5 Water Budget Uncertainty

Uncertainty refers to a lack of understanding of the basin setting that significantly affects an Agency's ability to develop SMC and appropriate projects and management actions in a GSP, or to evaluate the efficacy of plan implementation, and therefore may limit the ability to assess whether a basin is being sustainably managed. Uncertainty exists in all components of each water budget and in the assumptions used to project potential future conditions related to planned development and associated urban demands as well as projections of climate change. These uncertainties are not expected to substantially limit the ability to develop and implement a GSP for the basin including the ability to develop SMC and appropriate projects and management actions, nor the ability to assess whether the basin is being sustainably managed over time. It is anticipated that these uncertainties will be reduced over time through monitoring and additional data collection, refinements to the BBGM and other tools, and coordination with neighboring basins.

2.3.6 Sustainable Yield Estimate

SGMA defines sustainable yield as "the maximum quantity of water, calculated over a base period representative of long-term conditions in the basin and including any temporary surplus, that can be withdrawn annually from a groundwater supply without causing an undesirable result (CWC 10721(w))."

2.3.6.1 Current Conditions

The current sustainable yield is estimated based on 10-year rolling average using measured and estimated groundwater extraction and annual change in storage calculated from observed groundwater level measurements. The change in groundwater storage is estimated based on the change in measured spring-to-spring groundwater levels at each RMS well, multiplied by the area of a Thiessen polygon surrounding that RMS well (defining a representative area for each RMS well) and a representative storage coefficient of 0.1 for the subbasin. The GSP annual reports estimate the groundwater pumping through measurements (agricultural, municipal/industrial), calculations (rural residential), and estimates (municipal/industrial). In WY 2025, the 10-year average sustainable yield and overdraft are 45,300 AFY and +4,600 AFY, respectively. Currently, the Subbasin is operating within its sustainable yield. The sustainable yield and overdraft estimate may be updated periodically to account for climate change.

2.3.6.2 Future Conditions

The BBGM v.1.0 was used to estimate sustainable yield under different climate scenarios.. Historical water budget estimates indicate an average annual decrease in storage of up to 3,700 AFY. In general, decreased precipitation and increased groundwater pumping in dry years leads to decreases in groundwater levels and storage and may pose challenges to operating within the sustainable yield over multiple dry years. Operation of the basin within the sustainable yield may require implementation of projects and management actions.

Draft estimates have been developed for the basin for each scenario as the long-term annual groundwater pumping, minus the average annual decrease in groundwater storage, as summarized in Table 2-8.

Table 2-8: Estimated Groundwater Pumping, Decrease in Storage, and Change in Sustainable Yield (version BBGM v.1.00)

Baseline Scenario	Groundwater Pumping (AFY)	Decrease in Groundwater Storage (AFY)	Difference (AFY)
Current	43,000	-100	43,100
Future, No Climate Change	44,900	300	44,600
Future, 2030 Climate Change	46,700	200	46,500
Future, 2070 Climate Change	48,700	400	48,300

However, as discussed in Section 2.3.4, the decrease in groundwater storage is sensitive to the period used to calculate this value. All of the scenarios presented in Table 2-8 are based on 50 years of data. As discussed in Section 2.3.11, a fifth scenario was used called historical that covers the period from 2000 to 2018 or 18 years. The groundwater pumping and decrease in storage for this scenario are 47,100 AFY and 3,700 AFY, respectively. Using these values, a sustainable yield of 43,400 AFY would be calculated similar to the Current scenario.

These projected sustainable yield estimates using the BBGM v.1.0 are preliminary and subject to change. The GSA may periodically update sustainable yield to reflect current conditions using the methodology described in Section 2.3.6.1 until further model calibration is complete.

2.3.7 Opportunities for Improvement to the Water Budget

2.3.7.1 Refine Surface Water Diversion Estimates

While many of the large diversions are continuously monitored and recorded, limited information is available for others. It is recommended that the GSA in the basin work with local stakeholders to better document surface water diversions. Diversion estimates developed as part of the water budgets provide a good basis to support discussion with diverters.

2.3.7.2 Refine Groundwater Pumping Estimates

Groundwater pumping for irrigation has generally been estimated based on estimates of crop irrigation requirements in areas known to rely on groundwater. It is recommended that the GSA look for opportunities to verify and refine groundwater pumping estimates to support water budget validation and refinements by obtaining pumping data from cooperative landowners.

2.3.7.3 Refine Deep Percolation Estimates

Deep percolation in some areas may return to the surface layer through accretion in drains and natural waterways or may be consumed by phreatophytic vegetation. It is recommended that the GSA look for opportunities to further understand and investigate the ultimate fate of deep percolation from agricultural lands. Through modeling of specific waterways and shallow groundwater, the BBGM can help support these investigations.

2.3.7.4 Refine Urban Lands Water Budgets

The relative proportion of non-consumed water returning as deep percolation or surface runoff does not explicitly account for percolation from stormwater retention ponds or releases from wastewater treatment plants to local waterways. There is an opportunity to refine water budgets for developed lands to verify and refine estimates of non-consumed water. Additionally, there is an opportunity to evaluate and develop refined water use estimates for industrial uses.

2.3.7.5 Refine Characterization of Interbasin Flows

Interbasin flows are dependent on conditions in adjacent basins. It is recommended that the GSA refine estimates of subsurface groundwater flows from and to neighboring basins through coordination with GSAs in neighboring basins during GSP implementation and through review of modeling tools that cover the Sacramento Valley region, including the C2VSim and SVSim integrated hydrologic model applications developed by DWR.

2.3.7.6 Land Use Changes Due to the Camp Fire

In 2018, the Camp Fire destroyed 18,000 structures in Butte County displacing over 27,000 residents. While the Town of Paradise, Concow and other areas destroyed by the Camp Fire rebuild, many residents have relocated to the City of Oroville and other portions of the Wyandotte Creek Subbasin. The existing General Plans may not fully account for the relocation of Camp Fire survivors. A focused accounting of changes to residential land use as a result of the Camp Fire should be conducted.

3. SUSTAINABLE MANAGEMENT CRITERIA

SMC offer guideposts and guardrails for groundwater managers seeking to achieve sustainable groundwater management (Figure 3-1). SGMA defines sustainable groundwater management as "the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results," where the planning and implementation horizon is 50 years with the first 20 years spent working toward achieving sustainable groundwater management and the following 30 years (and beyond) spent maintaining it (California Water Code §10721). For the Wyandotte Creek Subbasin, SMC were formulated by working with the Wyandotte Creek Subbasin GSA and WAC, and members of the public. During development of the 2022 GSP, this stakeholder outreach process was facilitated by the Consensus Building Institute (CBI) with sessions documented on the Wyandotte Creek GSA website. Outreach included a robust discussion and broad agreement on the Wyandotte Creek Subbasin sustainability goal as well as what constitutes locally defined undesirable results. The sustainability goal is meant to reflect the GSA's desired condition, maintained over time, for the groundwater basin. Similarly, public engagement supported the development of amendments to the GSP.

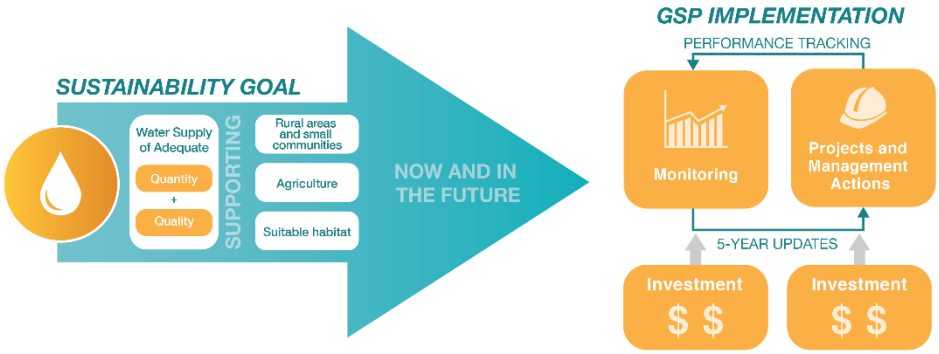


Figure 3-1: Flow Chart for Sustainability

Undesirable results are associated with up to six SIs that include chronic lowering of groundwater levels, reduction in groundwater storage, land subsidence, degraded groundwater quality, depletion of interconnected surface waters, and sea water intrusion. SGMA defines undesirable results as those having significant and unreasonable negative impacts to these six SIs. Failure to avoid undesirable results on the part of the GSA may lead to intervention by the State. Once the sustainability goal and undesirable results have been locally identified, projects and management actions are formulated to achieve the sustainability goal and avoid undesirable results.

The Wyandotte Creek Subbasin is divided into two MAs: Oroville and South (Figure 1-1). The associated undesirable results for each SI have been defined similarly across the two MAs. In turn, the rationale and approach for determining MT and MO for each SI are the same across the two MAs.

The terminology for describing SMC is defined as follows:

- Undesirable Results – Significant and unreasonable negative impacts associated with each SI.

- MT – Quantitative threshold for each SI used to define the point at which undesirable results may begin to occur.
- MO – Quantitative target that establishes a point above the MT that allows for a range of active management to prevent undesirable results.
- Margin of Operational Flexibility – The range of active management between the MT and the MO.
- Interim Milestones (IM) – Targets set in increments of 5 years over the implementation period of the GSP offering a path to sustainability.

Figure 3-2 illustrates these terms for the groundwater level SI.

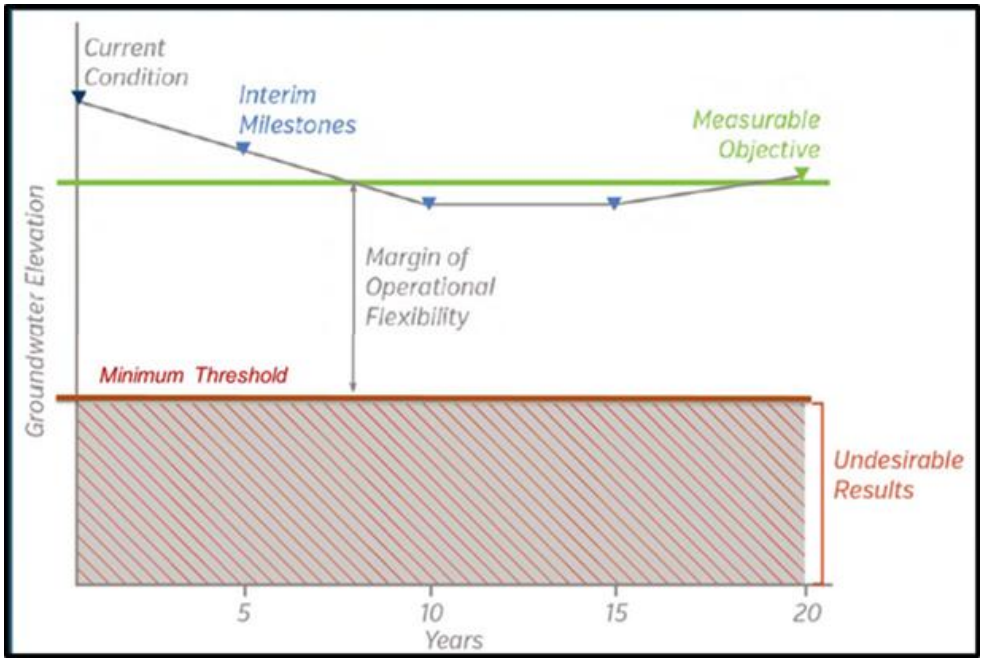


Figure 3-2: Illustration of Terms Used for Describing Sustainable Management Criteria Using the Groundwater Level Sustainability Indicators

SIs are intended to be measured and compared against quantifiable SMC throughout a monitoring framework of RMS (Section 4). Ongoing monitoring of SIs can:

- Determine compliance with the adopted GSP
- Offer a means to evaluate the effectiveness of projects and management actions over time
- Allow for course correction and adaptation in 5-year periodic evaluations
- Facilitate understanding among diverse stakeholders
- Support decision-making on the part of the GSA into the future

To quantify SMC for the Wyandotte Creek Subbasin, information from the HCM, descriptions of current and historical groundwater conditions, and input from stakeholders have been considered.

3.1 Sustainability Goal

The sustainability goal for the Wyandotte Creek Subbasin is:

> *to ensure that groundwater is managed to provide a water supply of adequate quantity and quality to support beneficial users of groundwater including but not limited to rural areas and other communities, the agricultural economic base of the region, and environmental resource uses in the Subbasin now and in the future.*

Implementation of the Wyandotte Creek GSP may achieve sustainability before 2042, however, groundwater levels in the Wyandotte Creek subbasin may continue to decline during the implementation period. As projects are implemented and basin operations are modified, sustainable groundwater management will be achieved within its sustainable yield. The Wyandotte Creek Subbasin will be managed to prevent undesirable results throughout the implementation period, despite the possible decline of groundwater elevations. This sustainability goal is supported by locally defined MTs that will avoid undesirable results. Demonstration of stable groundwater levels on a long-term average basis combined with the absence of undesirable results will ensure the Wyandotte Creek Subbasin is operating within its sustainable yield and the sustainability goal will be achieved.

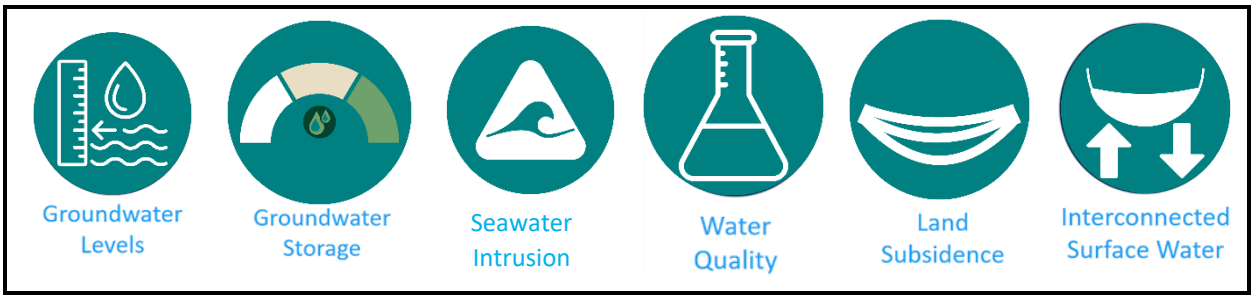
SMC within the Wyandotte Creek Subbasin emphasize management objectives related to domestic, municipal, and agricultural wells as well as suitable habitat. Groundwater management has already been occurring throughout Butte County. The Wyandotte Creek Subbasin will be managed within its sustainable yield by adapting existing management objectives and strategies to address current and future conditions, or by developing new ones. Sustainable yield means the maximum quantity of water, calculated over a base period representative of long-term conditions in the basin and including any temporary surplus, that can be withdrawn annually from a groundwater supply without causing an undesirable result. The Wyandotte Creek Subbasin intends to achieve its sustainability goal by implementing GSP projects and management actions that both augment water supply and increase efficiency of water application (see Section 5 for proposed projects and management actions and Section 6 for the implementation plan to achieve sustainability).

The BCDWRC has been participating in groundwater management activities for many years, including within the Wyandotte Creek Subbasin. In the last several years, the BCDWRC has increased groundwater level and water quality monitoring and has worked with other entities to collect and disseminate water data. In addition, the BCDWRC assists with other locally driven groundwater management activities. The Wyandotte Creek Subbasin intends to build on this ongoing county-wide process and broadly shares the objective of long-term maintenance of high-quality groundwater resources within the region for domestic, agricultural, and environmental uses.

3.2 Sustainability Indicators, Minimum Thresholds, and Measurable Objectives

3.2.1 Sustainability Indicators

Six SIs are defined by SGMA and are used to characterize groundwater conditions throughout a basin or subbasin. SGMA requires development of locally defined SMC for each SI and allows for identification of SIs that are not applicable. For example, sea water intrusion is not applicable in the Wyandotte Creek Subbasin due to its distal location from the Pacific Ocean.



Sustainability Indicators and associated undesirable results, if significant and unreasonable

3.2.2 Minimum Thresholds

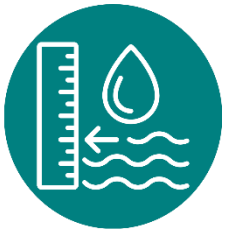
As noted earlier, MT are those quantitative thresholds for each SI used to define the point at which undesirable results may begin to occur. Undesirable results are those having significant and unreasonable negative impacts, avoidance of which is required by SGMA. Potential impacts and the extent to which they are considered "significant and unreasonable" were determined by the GSA Board of Directors with input from the WAC and members of the public. The GSA established MTs intended to prevent such significant and unreasonable negative impacts from occurring. If observed data trend toward the locally defined MTs, this will trigger action on part of the GSA to reverse this trend before reaching the MT. Actions to reverse a trend toward reaching a MT could be taken at any time during implementation. For this reason, MTs are like guardrails.

3.2.3 Measurable Objectives / Interim Milestones

MO are those quantitative targets that establish a point above the MT that allows for a range of active management to achieve the sustainability goal and prevent undesirable results. This range of active management between the MT and the MO is referred to as the margin of operational flexibility.

MO were determined by the GSA Board of Directors with input from the WAC and members of the public. The GSA established MO intended to preserve the desired condition throughout the Wyandotte Creek Subbasin while offering flexibility in GSP implementation. IM are targets set in increments of 5 years over the implementation period of the GSP offering a path to sustainability. For this reason, the MO and IM are like guideposts.

3.3 Groundwater Levels Sustainable Management Criteria



Groundwater Level SMC are those meant to address the chronic lowering of groundwater levels and avoid the depletion of supply at a given location that may lead to undesirable results caused by groundwater pumping. The locally defined undesirable result, MT, and MO are discussed in the next sections.

3.3.1 Undesirable Result

An undesirable result caused by the chronic lowering of groundwater levels is experienced if:

> *sustained groundwater levels are too low to provide a water supply of adequate quantity and quality to achieve the Sustainability Goal. Two (or 25%, whichever is greater) RMS wells within a management area reach their MT for two consecutive years.*

3.3.2 Minimum Thresholds

The Groundwater Level MT represent quantitative thresholds used to define the point at which undesirable results may begin to occur, avoidance of which is required under SGMA. To establish locally defined MT, the Wyandotte Creek GSA, WAC, and members of the public explored and analyzed potential impacts of declining groundwater levels.

Potential impacts identified by stakeholders from declining groundwater levels included:

- Wells going dry, particularly nearby shallow domestic wells,
- Reduced pumping capacity of existing wells
- Need for deeper well installations and/or lowering of pumps
- Increased pumping costs due to greater lift
- Groundwater dependent ecosystem vegetative habitat loss

Data collection will continue to help further characterize groundwater dependent ecosystems (GDE), with the potential to reconsider the groundwater level SMCs in relation to GDEs during the next Periodic Evaluation Period ending in 2032.

In the most recent drought years (2020-2022), Butte County has documented a number of domestic wells that have "gone dry," meaning groundwater levels have fallen below the depth of the well installation and/or pump throughout the County. This occurred during summer months of recent drought years and heightened concern among some stakeholders. As a result, domestic well reliability and protection are the focus of the Groundwater Level MT. From a policy perspective, sustainably constructed domestic wells going dry would be a "significant and unreasonable" result of groundwater management. The quantitative Wyandotte Creek Subbasin Undesirable Result for the Chronic Lowering of Groundwater Levels occurs when:

> *Two RMS wells (or 25%, whichever is greater) within a management area reach their MT for two consecutive years.*

As shown in the figures presented in Appendix 3-A showing the average depth of domestic, irrigation, and public supply wells, domestic wells are generally shallower than other wells throughout the Wyandotte Creek Subbasin. These figures were constructed using data from DWR OSWRC and the completed Wyandotte Creek domestic well inventory. Protection of domestic wells was therefore deemed to be additionally protective of other well types, such as agricultural wells. The Wyandotte Creek Subbasin SMC for Chronic Lowering of Groundwater Levels is based on groundwater levels throughout the subbasin that would support sustainably constructed domestic wells. Exceeding the MT may lead to significant and unreasonable effects. Impacts to domestic wells and other groundwater uses may occur and would not constitute an Undesirable Result. Local and state drought responses play a role in addressing dry year impacts. However, once a drought period ends, it is anticipated that groundwater conditions should return to the MO levels. Year-type is defined according to the Sacramento Valley Water Year Hydrologic Classification and groundwater level is defined based on groundwater elevation.

The MT is set to the deeper value of two criteria:

- Criterion 1: Set to protect 95% of the nearby shallow domestic wells; AND

- Criterion 2: Set to a specified distance below the historic low: the distance is either the range of historically measured groundwater levels or 20 feet, whichever is shallower.

Criterion 1 is based on an updated domestic well risk assessment. In order to establish appropriate MT levels protective of sustainably constructed domestic wells, a representative zone (RMS zone) is established for each RMS well. 10 RMS zones, three in the Oroville MA and seven in the South MA, were created using the RMS wells as points as inputs into a Voronoi Diagram (see Appendix 3-C). The Criterion 1 depth is then calculated by finding the 5th percentile of well depths of all domestic wells in the RMS Zone. DWR's OSWCR database provides information on all submitted well completion reports when a well is drilled. This database contains information on characteristics of the wells, including well location, well use, and total well depth. These well characteristics, however, are not always accurate or precise, and, unfortunately, it is not known which of the wells in the database are in use or have been abandoned or replaced. OSWCR indicates that there are 785 domestic wells in the Subbasin. The final domestic well dataset used for Criterion 1 was refined from 785 wells down to 345 wells using the following steps:

- Removed 237 wells installed before 1980. This removes the oldest wells and wells likely to have been replaced as a result of historically low groundwater conditions that occurred during the 1976-1977 drought. Wells that remain are more likely to be consistent with current well standards and currently serving domestic water needs. Still, there is much information that remains to be gathered to further refine the dataset given the unknowns previously identified, as well as relationships to changes in surface elevation.
- Removed 35 domestic wells with estimated bottom elevations above observed historical low groundwater levels based on monitoring data.
- Excluded all domestic wells within public water supplier service areas. Eight domestic wells from California Water Company – Oroville, 25 wells from TWSD, and 135 wells from SGWPA were excluded.

A narrative description of Criterion 1 is as follows: a MT of 50 feet amsl at an RMS having 100 domestic wells within its RMS zone means that 5 wells within that zone have a reported total well depth such that the bottom of the well is at or above 50 feet amsl (and are therefore potentially vulnerable to going dry) and 95 wells have been completed at an elevation below 50 feet amsl (and are therefore not vulnerable to going dry). The fifth-percentile MT assigned to the RMS well is protective of ~~8~~95% of all domestic wells within the RMS zone. Though an attempt was made to remove wells that are no longer in use due to age, as discussed above, there still may be several wells in the dataset used that are not in operation or may go dry due to poor maintenance issues of the well not related to groundwater levels. Typically, domestic wells are shallower than other wells throughout the Wyandotte Creek Subbasin and therefore analyses of this well type yields MT that are largely protective of other well types such as agricultural wells. In addition, the lowering of groundwater levels during a single year is not considered significant and unreasonable and therefore not considered an undesirable result, as long as the groundwater levels rebound to values greater than the MT in the following years.

Criterion 2 was included as an alternative option for calculating MTs to allow for operational flexibility for agricultural and municipal supply wells in cases where the historical minimum groundwater level measured at a given RMS well, minus a buffer, was lower than the depth

calculated using Criterion 1. The buffer distance is either the range of historically measured groundwater levels or 20 feet, whichever is shallower.

Water levels calculated following Criterion 1 and Criterion 2 are summarized in Table 3-1.

Table 3-1: Water surface elevations calculated following Criterion 1 and Criterion 2

RMS Well ID	Criterion 1 WSE (ft AMSL)	Minimum WSE Measurement (ft AMSL) (Measurement Date)	WSE Range (ft)	Criterion 2 WSE (ft AMSL)[1]	Criterion Used for MT
Wyandotte Creek Subbasin – Oroville Management Area					
16Q001M	108	131.3 (07/2022)	9.1	122.2	1
32P001M	103	108.8 (09/2016)	44.0	88.8	2
PWS-03	-83	114.0 (10/2014)	25.0	94.0	2
Wyandotte Creek Subbasin – South Management Area					
13B002M	11	42.2 (07/2021)	26.9	22.2	1
22B001M	48	49.8 (07/2021)	59.0	29.8	2
25N001M	25	46.3 (07/2024)	34.0	26.3	1
19D003M	44	53.2 (08/2022)	35.0	33.2	2
08M001M	69	76.1 (07/2024)	38.8	56.1	2
16C001M	70	94.4 (08/2021)	35.7	74.4	1
31F001M	98	108.1 (03/2005)	42.0	88.1	2

[1] The[1]The buffer was set to 20 feet except for RMS well 16Q001M which used the historical WSE range.

3.3.3 Measurable Objectives / Interim Milestones

The Groundwater Levels MO represent quantitative targets that establish a point above the MT allowing for a range of active management to prevent undesirable results and reflect the desired state for groundwater levels in the year 2042. To establish the MO, the historic record of observed groundwater levels at each RMS was evaluated.

The MO was set equal to the average groundwater level recorded from October 1st, 2015, through September 30th, 2025.

IM for groundwater levels are set at regular intervals between 2022 and 2042. Since the MO for groundwater levels reflect current conditions and is set as a target for future conditions, all IMs for groundwater levels are set to the MO.

3.3.4 Minimum Threshold Effects on Beneficial Uses and Users

Groundwater level MT would primarily impact beneficial uses and users reliant on groundwater and environmental users.. To better understand the effect on beneficial uses and users, specifically domestic well users, a domestic well risk assessment was performed, which is presented in Appendix 3-B. The analysis provides an estimate of the undesirable result that would occur if water levels declined to the MT.

The following provides greater detail regarding the potential impact of lowering groundwater levels on several major classes of beneficial users:

1. **Rural and/or Agricultural Residential Drinking Water Users** - Falling groundwater levels can cause shallow domestic and stock wells to go dry, which may require well

owners to drill deeper wells. The well outage analysis shows, at the minimum threshold, 11% of domestic/shallow wells in the subbasin would be susceptible to well outages. Additionally, the lowering of the water table may lead to decreased groundwater quality in drinking water wells.

2. **Municipal Drinking Water Users** - Declining groundwater levels can adversely affect current and projected municipal users, causing increased costs for potable water supplies.
3. **Agricultural Users** - Continued lowering of groundwater levels increases costs to agricultural operations; this; this could necessitate changes in irrigation practices and crops grown and could cause adverse effects to property values and the regional economy.
4. **Environmental Uses** - Reduced groundwater levels may result in significant and unreasonable reduction of groundwater flow toward ISWs and availability of shallow groundwater to vegetative GDEs, which may adversely impact ecological habitat and resident species, resulting in reduced spatial coverage and/or health. Currently, in the Subbasin the location of ISWs and GDEs is a data gap the GSA is addressing through installation of new monitoring wells (installed March 2026).

To avoid undesirable results to the first three beneficial user groups, should they occur at water levels above the MT, the GSA includes aa well mitigation program as a management action (Chapter 5). To avoid undesirable results to the fourth group of beneficial uses, the GSA may expand upon historic monitoring and assessment efforts to fill data gaps, then develop mitigation programs to avoid significant and unreasonable impacts. In addition, adjustment of the MTs at relevant RMS locations and/or mitigation triggers could be incorporated in future periodic evaluations or amendments to the GSP as needed. The MO is already protective of GDEs, where they exist, as it preserves baseline water levels.

3.3.5 Summary

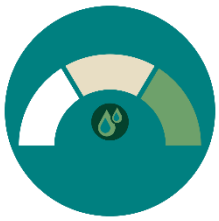
To achieve the sustainability goal and therefore preserve the desired condition for the groundwater basin over time, the GSA, in setting Groundwater Levels SMC, will implement appropriate projects and/or management actions as necessary to maintain groundwater levels within operational flexibility to limit the decline in groundwater levels to certain values and manage groundwater levels within established ranges at each RMS shown in Table 3-22. (See Section 4, Figure 4-5, and Table 4-6 for relevant information on the RMS for groundwater levels.)

Table 3-2: Groundwater Levels Sustainable Management Criteria by Representative Monitoring Site in Feet Above Mean Sea Level

RMS Well ID	Domestic Well Count	Well Type	MT	MO	IM		
					2027	2032	2037
Wyandotte Creek Subbasin – Oroville Management Area							
[16Q001M[3]	41	Shallow	108	139	139	139	139
32P001M[2]	64	Shallow	88.8	128	128	128	128
PWS-03[1,2]	1	Shallow	94	131	131	131	131
Wyandotte Creek Subbasin – South Management Area							
13B002M[3]	14	Deep	11	58	58	58	58
22B001M[2]	32	Shallow	29.8	89	89	89	89
25N001M[3]	23	Shallow	25	61	72	72	72
19D003M[2]	59	Shallow	33.2	72	105	105	105
08M001M[2]	74	Deep	56.1	105	106	106	106
16C001M[3]	74	Both	70	106	124	124	124
31F001M[2]	48	Shallow	88.1	124	58	58	58

Notes:
[1] The MT for RMS PWSPWS-03 will be set using criterion 2 due to only having 1 domestic well in the RMS zone.
[2] RMS well uses criterion 2 for setting the MT.
[3] RMS well uses criterion 1 for setting the MT.

3.4 Groundwater Storage Sustainable Management Criteria



Groundwater Storage SMC are those meant to address the reduction of groundwater storage caused by groundwater pumping. The locally defined undesirable result, MT, and MO are discussed in the next sections.

3.4.1 Undesirable Result

An undesirable result coming from the reduction of groundwater storage is experienced if:

> *sustained groundwater storage volumes are insufficient to achieve the Sustainability Goal.*

This undesirable result is closely related to that associated with groundwater levels. Because groundwater levels and groundwater storage are closely related, measured changes in groundwater levels can serve as a proxy for changes in groundwater storage. For this reason, the SMC developed for groundwater levels are used for groundwater storage to ensure avoidance of the undesirable result.

3.4.2 Minimum Thresholds

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

> *Two RMS wells (or 25%, whichever is greater) within a management area reach their MT for two consecutive years.*

In the historical record and recent years, there are incidences of shallow wells going dry in Butte County during summer months of critically dry years. This was noted in the earlier section addressing the development of Groundwater Levels SMC. MT intended to prevent significant and unreasonable negative impacts related to the chronic lowering of groundwater levels are assumed adequate to protect against significant and unreasonable reductions of groundwater storage. Section 3.3.4 Minimum Threshold Effects on Beneficial Uses and Users also applies to the groundwater storage SI.

3.4.3 Measurable Objectives

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

> *The groundwater level based on the groundwater trend line for the dry periods of observed short-term climatic cycles extended to 2030.*

The aquifer system in the Wyandotte Creek Subbasin generally has sufficient groundwater storage capacity to take additional groundwater recharge during wet periods and remain saturated during dry periods, allowing for a range of active management reflecting the desired state for groundwater storage at the year 2042.

3.5 Water Quality Sustainable Management Criteria



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

3.5.1 Undesirable Result

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

> *Two or 25% (whichever is higher) of measured RMS wells across the entire Wyandotte Creek Subbasin exceed their Maximum Threshold (MT) for two consecutive years.*

Salinity is the only water quality constituent for which MTs are established in the Wyandotte Creek Subbasin based on the potential for movement of underlying brackish water from greater depths into the freshwater pool where groundwater pumping for beneficial uses occurs. Other constituents, as discussed in Section 2.2.4, are managed through existing management and regulatory programs within the Wyandotte Creek Subbasin, such as the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) and the ILRP, which focus on improving water quality by managing septic and agricultural sources of salinity and nutrients. Additionally, point-source contaminants are managed and regulated through a variety of programs by the Regional Water Quality Control Board, DTSC, and the EPA. Through coordination with existing agencies, the Wyandotte Creek GSA will know if existing regulations are being met or groundwater pumping activities in the Wyandotte Creek Subbasin are contributing to significant and unreasonable undesirable effects related to degraded water quality from these constituents.

3.5.2 Maximum Threshold

The Water Quality Maximum Threshold (MT) for water quality represents a quantitative threshold used to define the point at which undesirable results may begin to occur, avoidance of which is required under SGMA. The MT is established based on the potential for movement of

underlying brackish water from greater depths into the freshwater pool where groundwater pumping for beneficial uses occurs.

To establish a locally defined MT, the Wyandotte Creek GSA Boards, WAC, and members of the public explored and analyzed potential impacts of degraded water quality.

Potential impacts identified by stakeholders were:

- Aesthetic concerns for drinking water
- Reduced crop yield and quality
- Increased reliance on surface water for "blending"

To address the potential impacts of concern related to degraded water quality, the GSA, in setting a MT, commits to avoiding a decline in water quality as it relates to specific conductance, a measure of the water's saltiness, which can impact the suitability of the water as a source for agricultural irrigation or domestic drinking water. Title 22 of CCR recommended secondary drinking water maximum contaminant level (MCL) for specific conductance is 900 µS/cm with an upper secondary MCL of 1,600 µS/cm and short-term secondary MCL of 2,200 µS/cm. Constituent concentrations lower than the recommended secondary contaminant level (900 µS/cm) are desirable for a higher degree of consumer acceptance. Constituent concentrations ranging to the Upper secondary contaminant level are acceptable if it is neither reasonable nor feasible to provide more suitable waters. Constituent concentrations ranging to the short-term secondary contaminant level are acceptable only for existing community water systems on a temporary basis pending construction of treatment facilities or development of acceptable new water sources. Water quality standards for irrigated agriculture aim to manage water salinity, which affects plant water availability and crop yield.

The maximum threshold for specific conductance in water quality representative monitoring wells is set to 900 µs/cm or the measured historical high, whichever is greater, to ensure safe drinking water (Title 22 CCR §64449-B). This maximum threshold was set based on best available data, limits that are protective of both irrigated agriculture and drinking water. Salinity thresholds for irrigation are more restrictive than the State Drinking Water Standards. Therefore, the MTs are protective of both irrigation and drinking water.

In Wyandotte Creek, undesirable results have not been reported historically, are not currently occurring, and are not expected to occur in the future. The current sampling schedule for these wells has provided the data by the first 5-year Periodic Evaluation to assess if undesirable results occur in this area, as well as developing SMCs for new RMS wells.

3.5.3 Measurable Objective / Interim Milestones

The Water Quality MO represents a quantitative target that establishes a point below the maximum threshold allowing for a range of active management to prevent undesirable results and reflect the desired state for groundwater quality at the year 2042. To address the potential impacts of concern related to degraded water quality, the MO was established for specific conductance at 700 µs/cm. This is protective of sensitive crops per California Department of

Health Services established agricultural water quality limits.[17] Additionally, it is below State below State Drinking Water Standards.. This is consistent with the Butte County Basin Management Objectives (BMO) defined in the Butte County Code of Ordinances. The Butte County BMO Program expired upon the adoption of the 2022 GSP.

Water quality monitoring implemented for compliance with SGMA will build upon Butte County's existing groundwater quality monitoring program. Additional monitoring by DWR and other agencies will continue to track constituents not managed by the GSA, including minerals, metals, pesticides, and herbicides.

Since groundwater quality is already at or near MOs, it is reasonable to set the interim milestones equal to the MOs to provide numerical metrics for the GSAGSA to track conditions so the basin remains sustainable.

3.5.4 Summary

To achieve the sustainability goal and therefore preserve the desired condition for the groundwater basin over time, the GSA, in setting the Water Quality SMC, commits to managing groundwater quality in line with the State Secondary Drinking Water Standards and California Department of Health Services' recommended limits for irrigation water at each RMS shown in Table 3-3. (See Section 4, Figure 4-6)

Table 3-3: Water Quality Sustainable Management Criteria by Representative Monitoring Site in µS/cm

GSP Well ID	Depth	MT	MO	IM		
				2027	2032	2037
Wyandotte Creek Subbasin – Oroville Management Area						
06E002M	Shallow	900	700	700	700	700
Wyandotte Creek Subbasin – South Management Area						
08M001M	Deep	900	700	700	700	700
09N002M	Deep	900	700	700	700	700
19D003M[1]	Shallow	900	700	700	700	700

Notes:

[1] New nested well (wells completed in same borehole) installed by DWR under TSS Grant.

3.6 Seawater Intrusion Sustainable Management Criteria

Seawater intrusion is not applicable to the Wyandotte Creek Subbasin due to its distal location from the Pacific Ocean.

[17] Artiola, Janick F., Ian L. Pepper, Mark Brusseau. Environmental Monitoring and Characterization. Table 9.4, pg 148

3.7 Land Subsidence Sustainable Management Criteria



Land Subsidence SMC are those meant to address land subsidence that substantially interferes with surface land uses caused by groundwater pumping. The locally defined undesirable result, MT, and MO are discussed in the next sections.

3.7.1 Undesirable Result and Minimum Thresholds

An undesirable result coming from land subsidence is experienced if:

> *groundwater pumping leads to changes in the ground surface elevation severe enough to cause disruptions to critical infrastructure, development and operations of projects that enhance the viability of rural areas, communities, and the agricultural economic base of the region. Undesirable results will occur when the ground surface elevation of at least 12% of monitoring sites (or at least 3 of 21 sites) declines a distance that exceeds the subsidence MT.*

The locations of the monitoring sites are shown in Figure 4-3 and 4-7.

The undesirable results from subsidence due to groundwater pumping are disruptions to critical infrastructure, development of projects that enhance the viability of rural areas, communities, and the agricultural economic base of the region. According to the DWR Subsidence BMP this may include disruptions and damage such as reduced capacity to convey water to beneficial users and damage to pipelines and other utilities.

While elastic subsidence is recoverable deformation, inelastic subsidence is permanent irreversible sinking of the ground surface. The minimum threshold is meant to represent inelastic, or irreversible, subsidence solely due to lowering groundwater levels and may lead to undesirable results. According to the DWR Land Subsidence Best Management Practices[18] (DWR Subsidence BMP) in groundwater basins where land subsidence has occurred, the MT should be the amount of subsidence that does not substantially interfere with surface land uses and infrastructure. Since the Subbasin has not experienced substantial disruption to infrastructure, the MT is based on historically observed vertical displacement.

Undesirable results related to land subsidence in the Wyandotte Creek Subbasin have not occurred historically, are not currently occurring, and are not likely to occur in the future. Elastic subsidence on the east side of the Sacramento Valley, including the Wyandotte Creek Subbasin, has historically not been a concern, with cumulative subsidence rarely greater than 0.1 feet. To assess land subsidence in the Sacramento Valley, a subsidence monitoring network was established consisting of observation stations and extensometers managed jointly by the USBR and DWR. This network of observation stations is no longer monitored within the Subbasin as of 2017. This subsidence monitoring network included six GPS monuments located within the Wyandotte Creek Subbasin. The subsidence monitoring network also included three extensometers in Butte County with a period of record beginning in 2005, which are still active (there are no extensometers in the Wyandotte Creek Subbasin). By 2019, a review of the data showed that changes in ground surface elevations were slight and remained at or above baseline

[18] https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/Land_Subsidence_BMP.pdf

levels, indicating that inelastic land subsidence has not been an observed in the Wyandotte Creek Subbasin. From 2020 to 2025, InSAR data does not detect any substantial subsidence (all displacement is within the -0.11 to 0.11 ft range of measurement uncertainty). This is likely due to relatively stable groundwater levels historically and subsurface materials that are not especially conducive to compaction. For this reason, inelastic land subsidence due to groundwater pumping is unlikely to produce an undesirable result in the Wyandotte Creek Subbasin.

3.7.2 Measurable Objectives / Interim Milestones

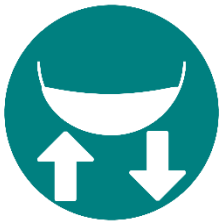
Undesirable results from subsidence are not currently observed in the Subbasin and the historical trends were used to set the subsidence MO, which is equal to the observed maximum subsidence from InSAR data (Table 2-2). The MO is one foot over 20 years (e.g., 0.25 feet over a 5-year period) for each InSAR pixel (Table 3-43). The interim milestone is 0.25 feet over a 5-year period. This MO and IM are consistent with those of the neighboring groundwater basins.

Table 3-43: Subsidence Sustainable Management Criteria

SMC	Subsidence Extent from 2022 (feet)	Subsidence Rate (feet per 5 years)
IM 2027	0.25	0.25
IM 2032	0.50	0.25
IM 2037	0.75	0.25
MO	1.00	0.25
MT	2.00	0.50

3.8 Interconnected Surface Water Sustainable Management Criteria

Interconnected Surface Water SMC are those meant to address depletions of interconnected surface water caused by groundwater pumping. Relevant context, the Interconnected Surface Water SMC framework, and the locally defined undesirable result, MT and MO are presented in the next sections.



3.8.1 Relevant Context

The objective of the Interconnected Surface Water SMC is to avoid significant and unreasonable adverse impacts on beneficial uses of surface water resources (rivers, creeks and streams). To address this SMC, DWR has provided various forms of guidance, including mapping of potential GDEs. GDEs are a sub-class of aquatic and riparian habitat that depend on groundwater for optimum ecological function. The distinction between an ecosystem's dependence on groundwater versus its dependence on surface water and the associated riparian zone or floodplain is important. In addition, the distinction between the shallow aquifer zone and the deep aquifer zone, or principal aquifer, is important. The principal aquifer only influences surface water to the extent that it affects water levels in the shallow aquifer zone which then influences the shallow aquifer zone's connection to the stream. The Feather River and its floodplain are affected by large and cumulative hydrologic processes, including operation of multiple reservoirs.

Potential impacts of the depletion of interconnected surface water were discussed by stakeholders during technical discussions covering the fundamentals of groundwater-surface water interactions. Potential impacts identified by stakeholders were:

- Reduced flows in rivers and streams supporting aquatic ecosystems (in-stream GDEs) and water right holders
- Streamflow changes in upper watershed areas outside of the Wyandotte Creek GSA boundary
- Cumulative groundwater flow moving toward the Feather River from both the Wyandotte Creek Subbasin and surrounding GSAs on both the east and west side of the river

The Wyandotte Creek Subbasin acknowledges that overall function of the riparian zone and floodplain is dependent on multiple components of the hydrologic cycle that may or may not have relationships to groundwater levels in the principal aquifer. For example, hydrologic impacts outside of the Wyandotte Creek Subbasin, such as upper watershed development or fire-related changes in run-off, could result in impacts to streamflow, riparian areas, or GDEs that are completely independent of any connection to groundwater use or conditions within the Wyandotte Creek Subbasin.

Data needed to develop this SMC as required by Section 354.28 (c)(6)(B) of the GSP regulations includes: definition of stream reaches and associated priority habitat, streamflow measurements to develop profiles at multiple time periods, and measurements of groundwater levels directly adjacent to stream channels, first water bearing aquifer zone, and deeper aquifer zones. The GSA has expanded its network of stream gages and groundwater wells near tributaries but needs additional time collecting data to further fill this data gap. The GSA intends to further evaluate this SMC for the next periodic evaluation to avoid undesirable results to aquatic GDEs. Preliminary SMCs are presented below with the goal of collecting additional data for five more years to address remaining data gaps. Finalized SMCs are expected to be developed for the 2032 periodic evaluation to manage stream depletions as needed. To that end, an Interconnected Surface Water SMC framework has been developed for the GSP as described below. This framework will guide future data collection efforts to fill data gaps as part of GSP plan implementation. As additional data are collected and evaluated, the GSA will evaluate the development of additional SMC, as appropriate, for specific stream reaches and associated habitat where there is a clear connection to groundwater pumping in the principal aquifer.

3.8.2 Interconnected Surface Water SMC Framework

To evaluate the potential for depletion of interconnected streams, an integrated assessment of both surface water and groundwater is required that includes:

- Collect additional data from 2027 to 2032, with the aim of filling data gaps and developing finalized ISW SMCs for the 2032 periodic evaluation. This includes collecting data from newly installed wells and stream gages, and calibrating stream depletion estimates.
- Definition of stream reaches and associated priority habitat. This is typically developed using a combination of geomorphic classification of the stream channel and ecological classification of the associated habitat.

- Multiple streamflow measurements in each stream reach to develop a profile of streamflow at multiple time periods over at least one year. Comparison of flow rates in each reach defines whether the reach is gaining (water moving from the groundwater system to the stream/river) or losing (water moving from the stream/river to the groundwater system). A reach can be both gaining and losing, depending on the time of year (i.e., losing during high flow periods and gaining during low flow periods). Five new stream gages have been installed, growing the ISW network and filling data gaps.
- Measurement of groundwater levels directly adjacent to the stream channel in the adjacent riparian zone or floodplain. Groundwater measurement of this type is typically done with piezometers, or "mini-piezos," which may be very shallow (less than 15 feet deep) and hand-driven (i.e., not requiring a drill rig). Groundwater levels are collected simultaneous to streamflow profiles. New wells near stream channels have been installed in 2026, growing the ISW network and filling data gaps.
- Measurement of groundwater levels in the first water bearing aquifer zone. This is the first regional or sub-regional aquifer zone that interacts with the stream by either discharging water to the stream or gaining water from the stream. These wells are typically between 20 and 100 feet deep and require a drill rig for installation. It is important to complete these wells across the water table. Groundwater levels are collected simultaneous to streamflow profiles. Water level differences between the shallow aquifer and the water surface elevation of the nearest stream reach are evaluated. New wells for the shallow aquifer have been installed in 2026, growing the ISW network and filling data gaps.
- Measurement of groundwater levels in deeper aquifer zones. These are typically regional or sub-regional aquifers that are used for regional supply. Water levels in these aquifers can be higher or lower than water levels in the overlying aquifer. The degree of connectivity to the nearest stream reach depends on how stratigraphically isolated the deeper zone is from the shallow zone. These wells are typically greater than 100 feet deep and require a drill rig for installation. It is important to conduct a pumping test of the deeper aquifer and measure water levels in the overlying aquifer to determine how hydraulically connected it is to the overlying aquifer. It is important to complete wells in the shallow aquifer across the water table. Groundwater levels are collected simultaneous to streamflow profiles. Additional Airborne Electromagnetic (geophysical) data would be valuable in further understanding the structure and potential interconnection of the aquifers in different zones.

This information is then integrated to define which surface water reaches are connected to the shallow aquifer zones and where those shallow aquifer zones are influenced by pumping of the deeper aquifer zones. Butte County, NCWA and others, are leading a coordinated effort to work with DWR to better characterize ISW across the Sacramento Valley. It is anticipated that a regional model such C2VSimFG will be needed to effectively characterize stream depletions. The framework outlined above will need to be modified as needed to align with regional coordination efforts.

3.8.3 Undesirable Result

The undesirable result for this SMC is focused on connectivity where there is a measurable connection between groundwater levels in the principal aquifer and streamflow or associated aquatic habitat viability. The Wyandotte Creek Subbasin specifically recognizes deep-rooted tree species, such as Valley Oak, that are common along riparian corridors in the Feather River. This connectivity is not well measured or understood in the Wyandotte Creek Subbasin at this time and data gaps remain, although the GSA has installed new shallow wells to help address this data gap. For now, undesirable result coming from the depletion of interconnected surface water is simply defined as:

> *depletion of surface water flows caused by groundwater pumping significantly and unreasonably impacts beneficial uses of surface water. Two shallow RMS wells (or 25%, whichever is greater) across the entire Subbasin reach their MT for two consecutive years.*

The SMC ISW for ISW are set for ISW RMS wells using groundwater levels as a proxy for interconnected surface water.

3.8.4 Minimum Thresholds

The potential impact of groundwater levels on aquatic habitat or GDEs is typically specific to a certain stream reach or geographic area. Groundwater modeling conducted in association with the HCM (Section 2) incorporates the interaction of surface water and groundwater at a regional scale, including all the GSAs in Butte County. While the model is a useful tool for evaluating regional behavior of the groundwater system overall, there are significant data gaps that limit calibration of the groundwater response in the uppermost layer of the model, where the dynamics and "interconnectedness" between surface water and groundwater actually occur. During the next evaluation period (2027 – 2032), the GSA will continue to collect data on ISWs with the goal of revisiting ISW SMCs in the next periodic evaluation.

MT for interconnected surface water is set to the following:

> *The MT is set within 20 feet of the historical low, as follows: The MT is set to the historical low minus the range of observed groundwater surface elevations. If the calculated range is greater than 20 feet, then the MT is set to the historical low minus 20.*

Table 3-54 summarizes the historical low groundwater elevation, range from high to low groundwater elevation, and the proposed minimum thresholds. All MTs are set 20 feet below the historical low. Additional RMS wells may be added as data becomes available.

Table 3-5: Interconnected Surface Water Sustainable Management Criteria by Representative Monitoring Site in Feet Above Mean Sea Level

RMS Well ID	Historical low (ft AMSL) (Measurement Date)	WSE Range (ft)	MT[1]
PWS-03	114 (10/2014)	26	94
03D001M	64 (8/1998)	26	44
22B001M	50 (7/2021)	59	30

[1] All[1]All MTs are based 20 feet below the historical minimum elevation.

This MT is protective of interconnected surface water to minimize impacts to stream depletions (Table 3-5). 4).

3.8.5 Measurable Objectives / Interim Milestones

The ISW MO represents quantitative targets that establish a point above the MT allowing for a range of active management to prevent undesirable results and reflect the desired state for stream depletions in the year 2042. To establish the MO, the historic record of observed groundwater levels at each RMS was evaluated.

The MO was set equal to the average groundwater level recorded from October 1st, 2015, through September 30th, 2025.

IM for stream depletions are set at five-year intervals between 2022 and 2042. Since the MO reflect current conditions and is set as a target for future conditions, all IM will be set to the MO.6 Table 3-5 summarizes ISW SMCs.

Table 3-6: Interconnected Surface Water Sustainable Management Criteria by Representative Monitoring Site in Feet Above Mean Sea Level

RMS Well ID	Well Type	MT	MO	IM		
				2027	2032	2037
PWS-03	Shallow	94	131	131	131	131
03D001M	Deep	44	72	72	72	72
22B001M	Shallow	30	89	89	89	89

4. MONITORING NETWORKS

4.1 Monitoring Network Objectives

The objective of the existing monitoring networks is to observe and record data on groundwater levels, quality, and related conditions, such as the interconnection of surface water and groundwater and land subsidence. Wells included in the existing monitoring networks were selected based on spatial density, quality and frequency of historically collected data to detect short-term, seasonal, and long-term trends and evaluate conditions related to the effectiveness of the GSP. Parameters that have been monitored provide historic baseline information for establishing the current status of relevant SI that will be useful in tracking these SI as the GSP is being implemented. The complete list of SI is presented below:

1. Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued
2. Significant and unreasonable reduction of groundwater storage
3. Significant and unreasonable seawater intrusion
4. Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies
5. Significant and unreasonable land subsidence that substantially interferes with surface land uses
6. Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water

The existing monitoring networks form a pool of monitoring locations that will serve as the backbone of the representative monitoring network used to assess SGMA compliance as discussed in Section 3. The existing network will support improved understanding of conditions in the Wyandotte Creek Subbasin, inform ongoing management of the subbasin, and contribute to future Periodic Evaluations of the GSP. These objectives will be implemented in a manner that will:

- Demonstrate progress toward achieving MO, MT, and IM
- Monitor impacts to the beneficial uses or users of groundwater
- Monitor changes in groundwater conditions
- Quantify annual changes in water budget components, such as change in storage

Data collected from the monitoring networks will be used to track changes in groundwater elevations, water quality constituent concentrations, groundwater and surface water interactions and rates of subsidence at monitoring locations throughout the Wyandotte Creek Subbasin and will be compared to established SMC for each SI in annual reports and Periodic Evaluations.

In addition to being central to SGMA compliance by enabling tracking of SI, data collected through the monitoring network will be used to update inputs to the water budget and to guide interpretation of water budget results. Monitoring data will also be used to assess impacts of groundwater management on various categories of beneficial uses and users and to monitor overall groundwater conditions from local and subbasin-wide perspectives.

The monitoring networks for each of the following sustainability indicators are described below: groundwater levels, groundwater storage, water quality, land subsidence, and depletions of interconnected surface water. Seawater intrusion is not considered to be an SI relevant to the Wyandotte Creek Subbasin as seawater intrusion is not present and is not likely to occur in the Wyandotte Creek Subbasin due to the distance from the Pacific Ocean, bays, deltas, or inlets. However, there is some evidence that connate groundwater of a quality characteristic of its ancient marine origins is present in the Wyandotte Creek Subbasin and that this water has the potential to affect beneficial uses due to brackish characteristics. Ancient marine layers pose a water quality (saline) risk by contaminating groundwater from groundwater pumping. This GSP addresses this risk through the water quality SI.

The location of existing sites and the frequency of monitoring at each site are presented below as is the spatial density of locations in each of the monitoring networks. Data gaps and plans to fill these gaps are also discussed as part of the program for defining the representative monitoring network to be used in monitoring SI to ensure SGMA compliance. Explanations of how gaps identified in the monitoring network will be filled are provided in Section 4.10.

The goal of defining the existing monitoring networks, identifying gaps in the networks, and developing and implementing a program to fill those gaps is to develop a representative monitoring network capable of collecting information needed to address:

- Short-term trends in groundwater and related surface water conditions
- Seasonal trends in groundwater and related surface water conditions
- Long-term trends in groundwater and related surface water conditions
- Provide adequate coverage by establishing sufficient density of monitoring sites and frequency of measurements required to demonstrate short-term, seasonal, and long-term trends listed above

4.2 Groundwater Level Monitoring

Groundwater level monitoring in the Wyandotte Creek Subbasin is conducted through a network of monitoring wells used for observation of groundwater levels and computation of hydraulic gradients and flow directions in the principal aquifer. The network also allows for characterization of the groundwater table or potentiometric surface of the principal aquifer.

The twenty-one (21) wells included in the network were selected based on the degree to which data from these wells represents conditions in the area, use in existing monitoring programs, permission of the well owner to access the well, and the length and continuity of the monitoring record. Of the 21 wells, 6 are located in the Oroville MA and 15 are in the South MA. Table 4-1 lists wells now used for monitoring in each MA and Figure 4-1 shows the locations of these wells in their respective MAs. Multi-completion wells are sites where more than one monitoring well has been installed at a single location. The wells are drilled and screened at different depths with each well designed to measure groundwater elevations at a selected zone in the underlying aquifer. Section 2.1.6 and Figures 4-1 and 2-8C discuss and show AEM flightlines and representative aquifer cross-section.

Groundwater level monitoring sites were analyzed and then classified to provide stratigraphic context for the well screened intervals to identify which aquifer zone each monitoring well is representative of. A previous investigation (Blair et al., 1991) provided the initial framework for

placing screens of the monitoring wells into three different stratigraphic units, from oldest to youngest: Ione Formation, Mehrten Formation (including the Nomlaki Tuff), and the Laguna Formation.[19] Additionally, 72 boreholes and 8 Airborne Electromagnetic (AEM) data profiles from the Department of Water Resources (DWR) W07 region were used to guide interpretations as discussed in Section 2.1.6. In general, monitoring wells screened in the Laguna Formation are representative of the shallow (or upper) aquifer zone and wells screened in the Ione Formation are representative of the deeper aquifer zone. Table 4-1 identifies which aquifer zone each monitoring well is screened within (e.g., Shallow, Deep, or Both). RMS wells were selected based on proximity to domestic wells, aquifer zone representative of domestic wells, and having at least five years of high-quality measurements (further discussed in Section 4.9.1). Typically, domestic wells are screened in the shallow zone and upper portion of the deep aquifer zones. Both shallow and deep wells were used as RMS wells as these wells are intended to monitor conditions for domestic wells.

[19] Blair, T.C., Baker, F., and Turner, J., 1991, Cenozoic fluvial facies architecture and aquifer heterogeneity, Oroville, California, Superfund site and vicinity, in Tyler, N., and Miall, A.D., editors, Three-dimensional facies architecture of terrigenous clastic sediments and its implications for hydrocarbon discovery and recovery: SEPM Concepts in Sedimentology and Paleontology, No. 3, p. 147-159.

Table 4-1: Wyandotte Creek Subbasin Groundwater Level Broad Monitoring Network Wells

Well ID	State Well Number[1]	Monitoring Frequency	Multi-Completion	Well Type	Aquifer Category	Drill Depth	First Meas. Date	RMS?
Wyandotte Creek – Oroville Management Area								
16Q001M	19N03E**16Q001M**	Quarterly	No	Residential	Shallow	120	10/3/2000	Yes
32P001M	19N04E**32P001M**	Quarterly	No	Residential	Shallow	150	8/29/1959	Yes
PWS-01		Quarterly	No	Municipal	Shallow	186	2/1/1978	No
PWS-02		Quarterly	No	Municipal	Both	340	2/1/1978	No
PWS-03		Quarterly	No	Municipal	Shallow	150	2/1/1978	Yes
S1[2]		Continuous	Yes	Observation	Shallow	70	3/31/2026	No
Wyandotte Creek – South Management Area								
03D001M	17N03E**03D001M**	Quarterly	No	Irrigation	Shallow	179	4/10/1947	No
13B002M	17N03E**13B002M**	Quarterly	No	Irrigation	Deep	320	3/20/2001	Yes
09N002M	17N04E**09N002M**	Quarterly	No	Irrigation	Deep	325	3/20/2001	No
22B001M	17N04E**22B001M**	Quarterly	No	Residential	Shallow	80	3/8/1976	Yes
25N001M	18N03E**25N001M**	Quarterly	No	Irrigation	Shallow	164	3/9/1976	Yes
08M001M	18N04E**08M001M**	Quarterly	No	Irrigation	Deep	656	5/2/1961	Yes
16C001M	18N04E**16C001M**	Quarterly	No	Irrigation	Both	165	10/20/1947	Yes
19D001M	18N04E**19D001M**	Quarterly	Yes	Observation	Deep	720	6/14/2021	No
19D002M	18N04E**19D002M**	Quarterly	Yes	Observation	Deep	570	6/14/2021	No
19D003M	18N04E**19D003M**	Quarterly	Yes	Observation	Shallow	200	6/14/2021	Yes
31F001M	19N04E**31F001M**	Quarterly	No	Residential	Shallow	200	10/3/2000	Yes
M1[2]		Continuous	Yes	Observation	Shallow / Deep / Deep	105 / 290 / 585	3/31/2026	No
S2[2]		Continuous	Yes	Observation	Shallow	50	3/31/2026	No
S7[2]		Continuous	Yes	Observation	Shallow	50	3/31/2026	No
S10[2]		Continuous	Yes	Observation	Shallow	50	3/31/2026	No

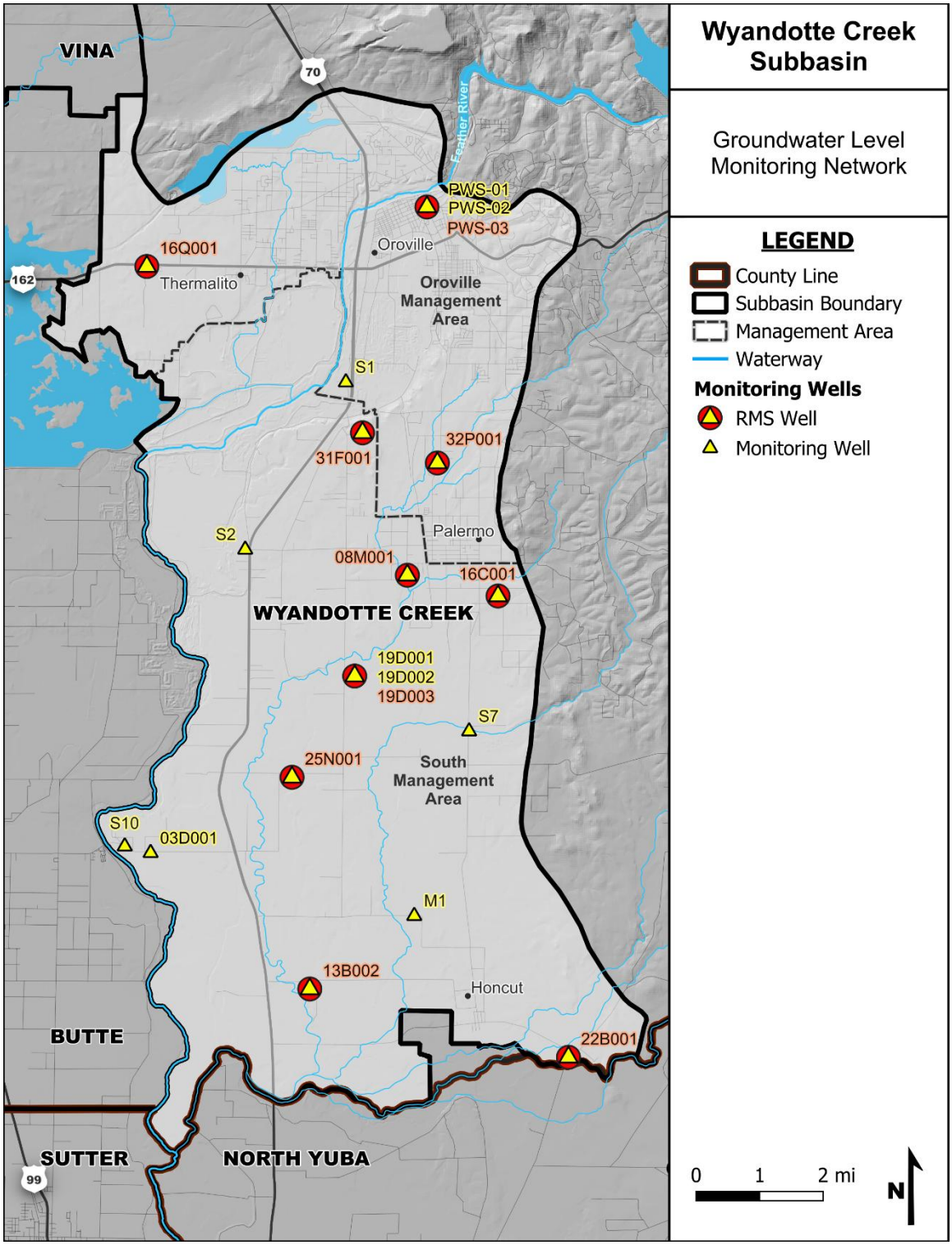


Figure 4-1: Groundwater Level Representative Monitoring Network

4.2.1 Density of Monitoring Sites and Frequency of Measurement

Each of the wells in the existing network is monitored either by Cal Water, Butte County, DWR, or the associated CASGEM collaborators in the subbasin. Each of the wells are reported quarterly.

For the purpose of SGMA compliance, water levels in the RMS network (Section 4.9) in the Wyandotte Creek Subbasin will be monitored at least biannually by the GSA, County or DWR within 14 days of one another.

Groundwater pumping typically peaks during the summer growing season and slows in the fall and winter. Therefore, spring levels represent an annual high prior to summer irrigation demands while fall levels represent an annual low for static (non-pumping) conditions. For wells that cannot be observed on the regular monitoring schedule or for which readings are questionable, it will be noted in the standard data sheet that the well was unable to be measured.

Groundwater elevation data will be used to observe seasonal and annual changes and for analysis of short-term and long-term trends. Analysis of trends in groundwater levels together with data on surface water deliveries and groundwater extraction will be important tools for tracking the Wyandotte Creek Subbasin's progress in meeting its MO and in determining the need for additional projects and management actions or modifications to projects and management actions to meet the MO.

A total of 21 wells are included in the network for monitoring groundwater levels. These wells are distributed over the 93 square- mile area of the Wyandotte Creek Subbasin with a distribution equivalent to a spatial density of 23 wells per 100 square miles, a network density that significantly exceeds those presented in the BMP Monitoring Networks and Identification of Data Gaps. Table 4-2 is taken from the BMP and shows a range of recommended monitoring network densities.

Table 4-2: Monitoring Well Density Considerations

Reference	Well Density (wells per 100 miles)
Heath (1976)	0.2 – 10
Sophocleous (1983)	6.3
Basins pumping more than 10,000 acre-feet/year per 100 miles	4.0
Basins pumping between 1,000 and 10,000 acre-feet/year per 100 miles	2.0
Basins pumping between 250 and 1,000 acre-feet/year per 100 miles	1.0
Basins pumping between 100 and 250 acre-feet/year per 100 miles	0.7

Annual groundwater pumping presented in the water balance section of the GSP shows a historical rate of pumping in the Wyandotte Creek Subbasin of 47,100 AFY (50,645 AFY per 100 square miles) and a current condition pumping rate of 43,000 AFY (46,237AFY per 100 square miles).

Each monitoring site is located in one of the Wyandotte Creek Subbasin's two MAs:

- Wyandotte Creek – Oroville: 6 wells in an area of 29 square miles, spatial density of 20.69 wells per 100 square miles.
- Wyandotte Creek – South: 15 wells in an area of 64 square miles, spatial density of 23.44 per 100 square miles.

4.3 Groundwater Storage Monitoring

4.3.1 Background

The BMP for Groundwater Monitoring (DWR, 2016) notes:

> *While change in groundwater storage is not directly measurable, change in storage can be estimated based on measured changes in groundwater levels… and a clear understanding of the Hydrogeologic Conceptual Model…. The HCM describes discrete aquifer units and the specific yield values associated with these units. These data, together with information on aquifer thickness and connectivity, can be used to calculate changes in the volume of groundwater storage associated with observed changes in groundwater elevation.*

As suggested in the preceding passage from DWR's BMP on Groundwater Monitoring, measured changes in groundwater levels can serve as a proxy for changes in storage. For this reason, the network for monitoring changes in groundwater storage is the same as that used for monitoring changes in groundwater levels. The groundwater level RMS network is a proxy for the groundwater storage RMS network. Monitoring sites and wells included in this network are presented above in Table 4-1 with well locations shown in Figure 4-3.3 It is anticipated that the methodology described in Section 2.3.66 will be utilized to calculate annual change in groundwater storage for the Annual Reports.

4.3.2 Frequency of Measurement

The data from the bi-annual frequency of monitoring groundwater levels described above will enable observed changes in levels to serve as a proxy to indicate changes in groundwater storage. Data presented in the HCM on parameters such as aquifer layer composition and thickness and the specific yield and hydraulic conductivity of these layers are integrated in the BBGM, and allow the model to be used to estimate changes in groundwater storage that result from observed changes in groundwater elevations. As data on aquifer characteristics and modeling capabilities improve, the methodologies used to relate changes in groundwater elevations with corresponding changes in storage will be updated.

4.4 Groundwater Quality

4.4.1 Background

Assessment of groundwater quality in the Wyandotte Creek Subbasin focuses on annual observation of salinity (through monitoring of specific conductance) and temperature in the principal aquifer. Each of these parameters is influenced by ambient conditions and the parent material of the principal aquifer. Specific conductance and pH are also influenced by human activity. While only salinity will be used to monitor attainment of MO and avoidance of breaches in MT, changes in pH and temperature may indicate shifting groundwater conditions that trigger additional investigation.

The groundwater quality monitoring network implemented for representative monitoring under SGMA will build upon the County's existing program. Additional monitoring will continue to be conducted by other agencies to track constituents not managed under this GSP including a variety of minerals, metals, pesticides, and herbicides. Data from the ongoing monitoring by various state and federal agencies will be available to the GSA to augment local understanding of water quality in the Wyandotte Creek Subbasin and can be found on the State Board's GAMA program at https://www.waterboards.ca.gov/gama/. Water quality programs conducted by other agencies are summarized in section 1.5.

Table 4-3 presents information on each of the wells monitored by Butte County in the Wyandotte Creek Subbasin groundwater quality monitoring network. Figure 4-2 shows the locations of the wells.

Table 4-3: Butte County Groundwater Quality Monitoring Program Sites

State Well ID Number	Local Name	Well Type
Wyandotte Creek – Oroville Management Area		
19N04E06E002M	Thermalito	Municipal and Industrial
Wyandotte Creek – South Management Area		
18N04E08M001M	N/A	Irrigation
17N04E09N002M	N/A	Irrigation
18N04E19D001M 18N04E19D002M 18N04E19D003M**	N/A	Observation

**completion used as RMS well.

4.4.2 Density of Monitoring Sites and Frequency of Measurement

The County's ongoing water quality monitoring program collects data annually in July which is near the peak season for groundwater demand. The groundwater quality monitoring sites are distributed over the 93 square-mile area of the Wyandotte Creek Subbasin resulting in a monitoring network with a spatial density of 2.1 sites per 100 square miles.

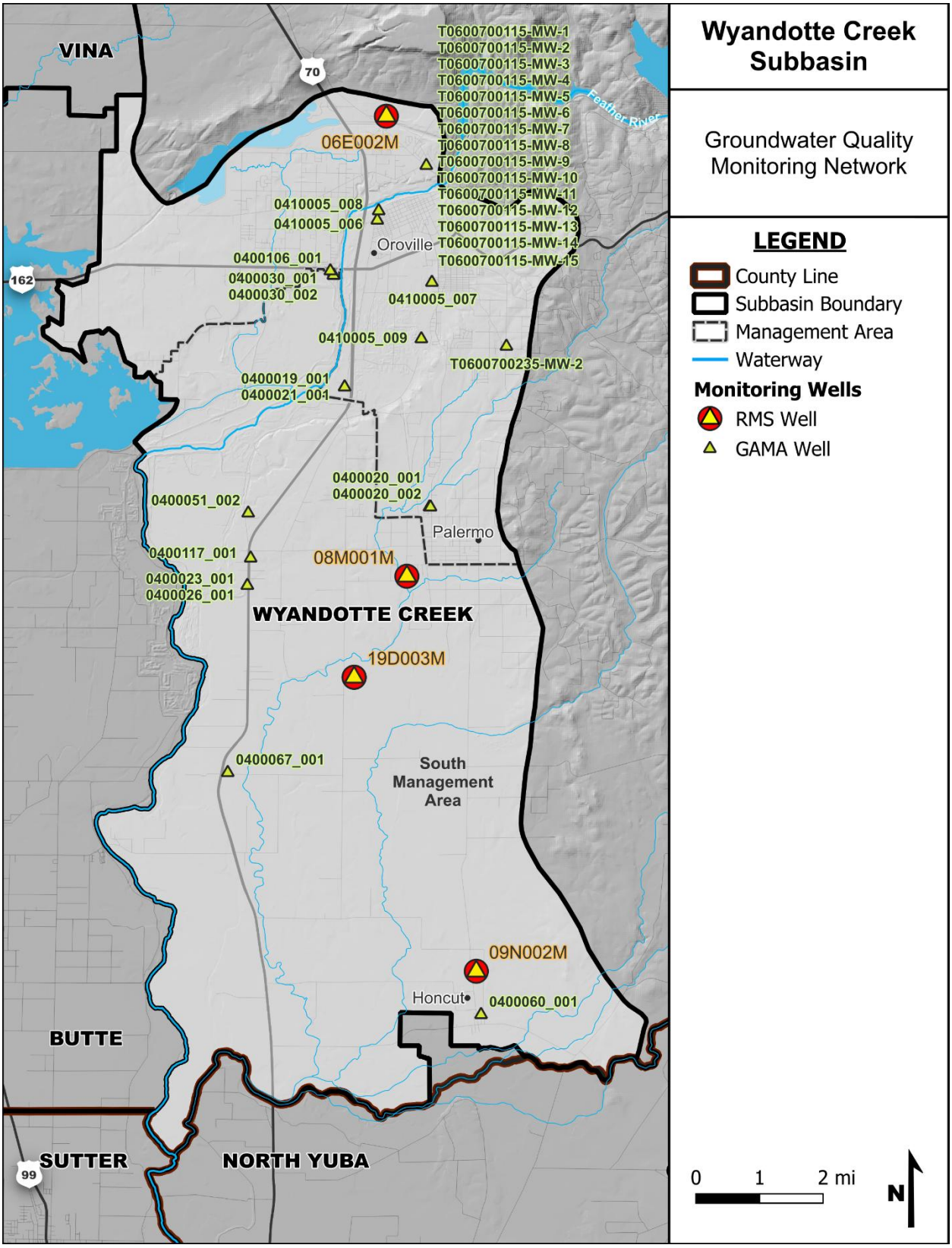


Figure 4-2: Groundwater Quality Monitoring Network

4.5 Land Subsidence

4.5.1 Background

Inelastic land subsidence has the potential to be of major concern in areas of active groundwater extraction due to infrastructure damage, permanent reduction in the storage capacity of an aquifer, well casing collapse, and increased flood risk in low lying areas. Inelastic subsidence typically occurs in the clay layers within aquifers and aquitards due to the withdrawal of water from storage within these layers. Water supports the structure of the clay layers, and dewatering permanently rearranges or collapses this structure, a process that cannot be reversed as groundwater cannot re-enter the clay structure after collapse.

To determine whether subsidence is occurring, a subsidence monitoring network has been established throughout the Sacramento Valley, the Sacramento Valley GPS Subsidence Monitoring Network. This system consists of observation stations and extensometers managed jointly by Reclamation and DWR. The observation stations are a result of DWR's efforts to establish a subsidence monitoring network to capture changes in subsidence across the Sacramento Valley. The observation stations are established monuments with precisely surveyed land surface elevations, which are distributed throughout the County such that the entire county is well represented. In 2008, DWR along with numerous partners performed the initial GPS survey of the observation stations to establish a baseline measurement for future comparisons. The network was resurveyed again in 2017 (DWR, 2018b) using similar methods and equipment as those used in the 2008 survey and results were analyzed to depict the change in elevation at each station between those two years.

Extensometers are installed in wells or boreholes and are a more site-specific method of measuring land subsidence as they can detect changes in the thickness of the sediment surrounding the well due to compaction or expansion. These instruments can detect very slight changes in land surface elevation on a continuous basis with an accuracy of +/- 0.01 feet or approximately 3 millimeters. The three extensometers in Butte County are all located outside of the Wyandotte Creek Subbasin.

Recent subsidence studies in the Central Valley have utilized satellite- and aircraft-based Interferometric Synthetic Aperture Radar (InSAR). Much of the InSAR work has been led by the National Aeronautics and Space Administration (NASA) Jet Propulsion Laboratory (JPL). However, because JPL InSAR data is limited to a period from 2015 through 2017, TRE ALTIMIRA InSAR available through DWR was used for this analysis as data from this source is available for a period starting June 2015 through present.

The Wyandotte Creek Subbasin monitoring network is shown on Figure 4-3. Available data indicate that inelastic land subsidence due to groundwater withdrawal has not occurred in the Wyandotte Creek Subbasin. This is likely due to relatively stable groundwater levels and subsurface materials that are not conducive to compaction.

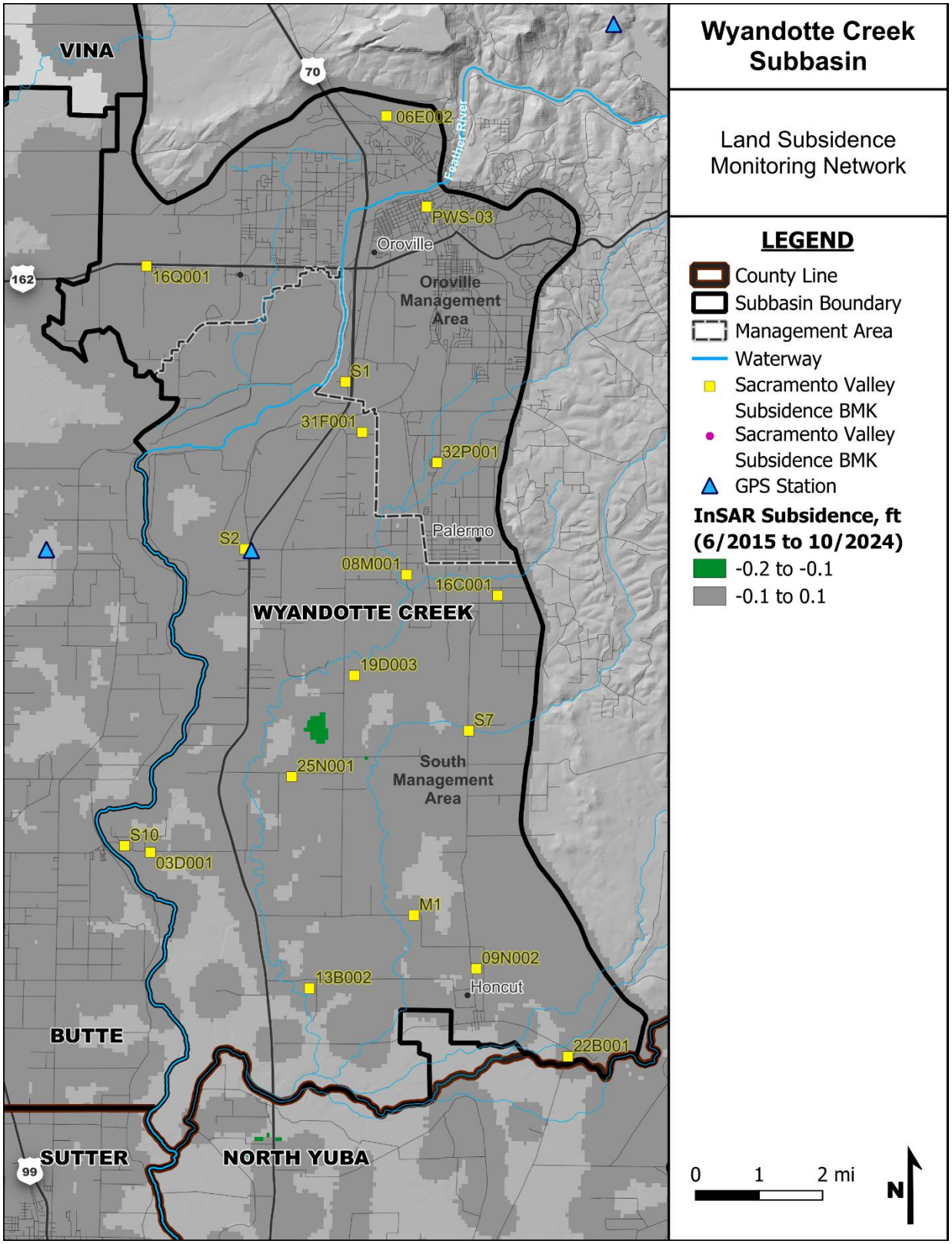


Figure 4-3: Subsidence Monitoring Network Showing Total Subsidence from June 2015 through October 2024

4.5.2 Location and Density of Monitoring Sites and Frequency of Measurement

The Sacramento Valley GPS Monitoring Network includes monuments that were measured in 2008 and 2017, while the InSAR program monitors subsidence on a continual basis. The GPS Monitoring Network is no longer active within the Subbasin, though one GPS Station in the subbasin continues to report vertical displacement. Data collected from both sources requires post processing and analysis, therefore the frequency of reporting is dependent on the work performed by DWR and TRE ALTAMIRA Inc. (TRE), under contract with the California Department of Water Resources (DWR). No extensometers exist in the Wyandotte Creek Subbasin.

4.6 Interconnected Surface Waters

4.6.1 Background

Monitoring depletions of interconnected surface water is conducted by monitoring water levels (stage) in streams and groundwater levels to characterize spatial and temporal exchanges between surface water and groundwater and to calibrate and apply the tools and methods necessary to estimate depletions. The existing monitoring network incorporates data from active stream gages reported to the California Data Exchange Center (CDEC), the California WDL, Yuba Water Agency, and the USGS National Water Information System and groundwater level monitoring, utilizing a subset of the locations described under the Wyandotte Creek Subbasin's groundwater level monitoring network.

The monitoring network for the Wyandotte Creek Subbasin includes stream gages listed in Table 4-4A and shown in Figure 4-4, as well as shallow groundwater quality monitoring sites in Table 4-4B and Figure 4-4. Groundwater level monitoring sites selected to observe groundwater–surface water interactions consist of the entire set of shallow wells in the monitoring network described in Section 4.2, which serves as the pool of potential RMS sites for assessing these interactions. The original nine shallow wells have been supplemented with 5 new shallow wells installed in 2026.

The stream gage network has also been expanded to a total of 12 stations. One USGS station stopped reporting daily streamflow in 2024. Two. Two CDEC/WDL stations were added—one (ORF) located directly across the Feather River from the inactive USGS station 11406930, and another (NHC) on Honcut Creek. Two stations operated by Yuba Water Agency on Honcut Creek have been incorporated. Five new stream gages were installed in 2026 to further strengthen the network.

As discussed in Section 4.1, the GSA in the Wyandotte Creek Subbasin intends to further evaluate the SMC for interconnected surface waters to avoid undesirable results to aquatic ecosystems and GDEs. As additional data are collected and evaluated, the Wyandotte Creek Subbasin commits to developing additional SMC and installation of monitoring points, as appropriate, for specific stream reaches and associated habitat where there is a clear connection to groundwater pumping in the principal aquifer.

As with locations used for monitoring other SIs, the network of stream gages and wells used to monitor interactions between groundwater and streamflow includes sites selected for their period of record, the quality of data reported and subject to permission of the landowner to monitor the well. The locations of the newly installed wells and gages were selected to:

- Better monitor surface bodies with known connections to the water table, such as the Feather River and Honcut Creek, Wyman Ravine, and Wyandotte Creek.
- Observe interactions between the water table and groundwater dependent ecosystems (in-stream GDEs),
- Support project planning and implementation, and assess benefits of SGMA project implementation in specific watersheds, such as Wyman Ravine.

A total of 14 monitoring wells and 12 stream gages are included in the Wyandotte Creek Subbasin's network for monitoring groundwater and streamflow interactions.

Table 4-4A: Wyandotte Creek Subbasin Surface Water Stream Gages

Stream Monitored	Gage ID	Well Network	Measurement Frequency	Status	Start Date	End Date
Oroville Management Area						
Feather River	11406930	USGS	Daily	Inactive	10/1/1973	9/30/2024
Feather River	ORF	CDEC	Daily	Active	12/26/2019	Present
South Management Area						
Feather River	11406920	USGS	Daily	Active	11/16/1967	9/30/2024
Feather River	GRL/ A05165	CDEC/WDL	Hourly/Continuous	Active	01/01/1984	Present
Honcut Creek	NHC/ A05189	CDEC/WDL	Continuous	Active	01/25/2018	Present
Honcut Creek	Honcut Creek Inflow	Yuba Water Agency	Continuous	Active	6/1/2021	Present
Honcut Creek	Honcut Creek Outflow	Yuba Water Agency	Continuous	Active	6/1/2021	Present
Wyman Ravine	SG5	GSA	Continuous	Active	3/31/2026	Present
Wyman Ravine	SG6	GSA	Continuous	Active	3/31/2026	Present
Wyandotte Creek	SG7	GSA	Continuous	Active	3/31/2026	Present
North Honcut Creek	SG8	GSA	Continuous	Active	3/31/2026	Present
Wyman Ravine	SG9	GSA	Continuous	Active	3/31/2026	Present

Table 4-4B: Wyandotte Creek Subbasin ISW Monitoring Network Wells

Well ID	State Well Number[1]	Monitoring Frequency	Multi-Completion (number of wells at site)	Well Type	Aquifer Category	Drill Depth	Date of First Meas.	RMS?
Wyandotte Creek – Oroville Management Area								
16Q001M	19N03E**16Q001M**	Quarterly	No	Residential	Shallow	120	10/3/2000	No
32P001M	19N04E**32P001M**	Quarterly	No	Residential	Shallow	150	8/29/1959	No
PWS-01		Quarterly	No	Municipal	Shallow	186	2/1/1978	No
PWS-03		Quarterly	No	Municipal	Shallow	150	2/1/1978	Yes
S1[2]		Continuous	Yes	Observation	Shallow	70	3/31/2026	No
Wyandotte Creek – South Management Area								
03D001M	17N03E**03D001M**	Quarterly	No	Irrigation	Shallow	179	4/10/1947	Yes
22B001M	17N04E**22B001M**	Quarterly	No	Residential	Shallow	80	3/8/1976	Yes
25N001M	18N03E**25N001M**	Quarterly	No	Irrigation	Shallow	164	3/9/1976	No
19D003M	18N04E**19D003M**	Quarterly	Yes	Observation	Shallow	200	6/14/2021	No
31F001M	19N04E**31F001M**	Quarterly	No	Residential	Shallow	200	10/3/2000	No
M1[2]		Continuous	Yes	Observation	Shallow	105	3/31/2026	No
S2[2]		Continuous	Yes	Observation	Shallow	50	3/31/2026	No
S7[2]		Continuous	Yes	Observation	Shallow	50	3/31/2026	No
S10[2]		Continuous	Yes	Observation	Shallow	50	3/31/2026	No

[1] The portion of the State Well Number shown in bold text is the RMS ID.

[2] Installed February / March 2026. Wells equipped with pressure transducers for continuous groundwater level and temperature monitoring.

4.7 Monitoring Protocols for Data Collection

4.7.1 Monitoring Protocols and Frequency for Groundwater Levels

Each of the wells in the monitoring network is monitored either by the GSA, Cal Water, Butte County, DWR, or the associated CASGEM entity. Access agreements, including written description of each site location, access instructions, and point of contact, will be arranged prior to initiation of field data collection.

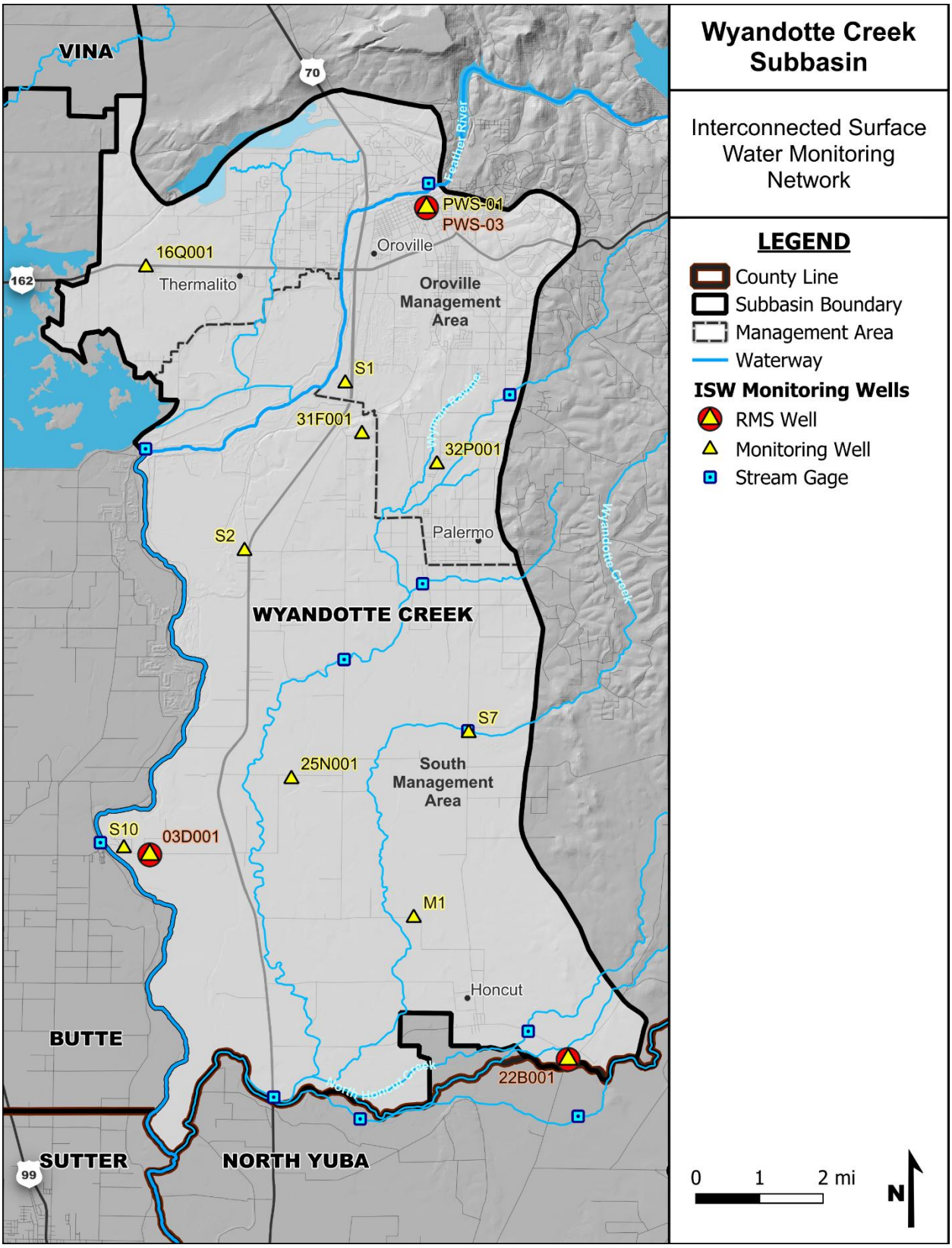


Figure 4-4. Interconnected Surface Water Monitoring Network

Monitoring for purposes of the GSP will be conducted in accordance with DWR guidelines (DWR, 2016) to ensure groundwater level data are:

- Taken from the correct location, well ID, and screen interval depth
- Accurate and reproducible
- Representative of conditions that inform appropriate basin management data quality objectives
- Recorded with all salient information to correct, if necessary, and compare data
- Handled in a way that ensures data integrity
- Taken using a CASGEM-approved water-level measurement method to ensure consistency across measurements

Methods include:

- Establishing a reference point
- Using one of four approved methods (steel tape, electric sounding tape, sonic water-level meter, or pressure transducer) to measure groundwater levels

Groundwater level data will include at a minimum the well identification number, measurement date, depth to water (to the nearest 0.01 or .1 foot depending on equipment) from the established reference point, measurement method, measurement quality descriptors (for no measurement or questionable measurement), and observations of well and/or site conditions (including modifications to the well). The equipment used to collect groundwater level data will be recorded to include the equipment manufacturer, model, and serial number, as applicable. Equipment used for data collection will be operated and maintained according the manufacturer's recommendations.

Each well in the network has an established reference point in North American Vertical Datum 1988.

The general procedure for groundwater level monitoring is as follows:

- The well port (cap, plug, or lid) for access will be removed. Pressure inside the well casing will be allowed to equalize to ambient conditions prior to data collection.
- Non-dedicated equipment will be decontaminated by washing with a non-phosphate soap solution and triple rinse of distilled water.
- Groundwater level data (described above) will be recorded.
- Groundwater elevation will be recorded (groundwater elevation = reference point elevation – depth to water).
- The well port (and lock, if applicable) will be replaced.

Groundwater level data will be entered into the data management system (DMS) as soon as possible following collection.

Monitoring frequency for each well will occur at a minimum of bi-annually. Monitoring will be conducted in the Spring (March) and Fall (October). Select wells are monitored more frequently via dataloggers, at an hourly basis, but will only be reported bi-annually. Each RMS will be monitored within the same calendar month to ensure consistency for comparability over time. This monitoring frequency will achieve the goal of obtaining sufficient data to evaluate the seasonal, short-, and long-term trends in groundwater.

4.7.2 Monitoring Protocols and Frequency for Water Quality

Each of the wells in the existing network is monitored for water quality by DWR and other agencies, both private and public, including Butte County.

Monitoring for purposes of the GSP will be conducted in accordance with DWR guidelines (BMP 1) to ensure water quality data:

- Are taken from the correct location
- Are accurate and reproducible
- Represent conditions that inform appropriate basin management and are consistent with the data quality objectives
- Are handled in a way that ensures data integrity
- Include pertinent information that is recorded to normalize, if necessary, and compare data

Water quality will be measured for compliance through monitoring of specific conductance. However, pH and temperature may also be recorded for informational purposes. Water quality samples will be assessed in the field and will not require laboratory analysis.

Groundwater quality data will include at a minimum the well identification number, sample time and date, groundwater elevation data if available (as described in Section 4.2), water quality values for pH, specific conductance, and temperature, sample quality descriptors (for no measurement or questionable measurement), and observations of well and/or site conditions (including modifications to the well). The equipment used to collect groundwater quality data will be recorded to include the equipment manufacturer, model and serial number, as applicable. Equipment used for data collection will be calibrated, operated and maintained according to the manufacturer's recommendations.

The general procedures for groundwater quality sampling include:

- For wells with dedicated pumps, the sample will be collected near the wellhead.
- The sampling port and/or sampling equipment will be decontaminated by washing with a non-phosphate soap solution and triple rinse of distilled water prior to sample collection.
- With the exception of observation wells, the well will be purged of three well casing volumes prior to sampling (if not equipped with dedicated low-flow or passive equipment).
- Samples will be collected under laminar flow conditions.
- Equipment will be field calibrated to assess drift.

Monitoring for water quality for each well will occur annually in July or August. Select wells may be monitored more frequently but will only be reported annually. Each RMS will be monitored within one calendar month to ensure consistency for comparability over time. This monitoring frequency will achieve the goal of obtaining sufficient data to evaluate the seasonal, short-, and long-term trends in groundwater.

4.8 Representative Monitoring Sites

Representative monitoring sites (RMS) are a subset of monitoring sites chosen by the GSA to characterize conditions in the Subbasin. RMS sites have defined minimum thresholds, measurable objectives, and interim milestones, to monitor sustainability indicators. The data gathered from the RMS will be used to quantify the groundwater conditions for the five SIs and evaluate GSP implementation.

RMS wells were selected using the following criteria:

1. Adequate Spatial Distribution – RMS were selected from the monitoring network to maximize the geographical coverage across each of the two MAs and avoid overlapping or redundant coverage.
2. Existing Data – RMS with a longer period of record and a greater number of historical measurements were selected to provide insight into long-term trends that can provide information about groundwater conditions through varying climatic periods such a droughts and wet periods. Historical data may also show changes in groundwater conditions through anthropogenic effects as well. While some sites chosen may not have extensive historical data, they may still be selected because there are no wells nearby with longer records.
3. Increased Density in Heavily Pumped Areas – Selection of additional wells in heavily pumped areas such as within urban residential areas in the city of Oroville will provide additional data where higher groundwater use occurs.
4. Multi-Completion Wells – The utilization of wells with different screen intervals is important to collect data on the groundwater conditions at different elevations within the aquifer. This can be achieved by using wells with different screen depths that are close to one another, or by using multi-completion wells.
5. Consistency with BMPs – The BMPs provided by DWR encourage consistency across subbasins and compliance with established regulations.
6. Well Construction Data – Well data such as perforation depths, construction date, and well depth was considered for selection.
7. Accessibility – Consideration for accessibility to the physical well location and to the existing data was incorporated into the selection of RMS wells. RMS in the network include residential, municipal, agricultural, and governmental wells that are owned and operated by various private and public entities.
8. Beneficial Uses/Users – RMS wells were selected if its location and/or screening interval represented local beneficial users such as domestic wells and interconnected surface water.

9. Professional Judgement – Professional judgement was used to make the final decision about each well, particularly when more than one suitable well exists in an area of interest.

4.9 Representative Monitoring Sites for Sustainability Indicators

Each of the associated SMC for each SI described in Section 3 have RMS wells identified for monitoring and evaluation with the exception of seawater intrusion as it is not applicable to the Wyandotte Creek Subbasin. The selected RMS wells for each SI are discussed in the following sections.

4.9.1 Groundwater Levels and Groundwater Storage

The RMS wells will be used as compliance points to record groundwater elevations for the evaluation of chronic lowering of groundwater levels and groundwater storage. SGMA allows groundwater elevations to be used as proxy for monitoring other SI if a significant correlation exists between groundwater elevations and the other SI and if the MO for groundwater elevation include a reasonable margin of operational flexibility to avoid undesirable results.

Groundwater storage is directly connected to groundwater elevation, and therefore the same RMS network is used for both SIs.

A total of ten RMS wells were selected as compliance points for monitoring of groundwater levels and groundwater storage (Figure 4-5). They will be monitored for the SMC listed in Section 3.9. RMS wells were selected to be representative of domestic wells and upper and lower aquifer conditions (similar to irrigation wells) and includes shallow wells relevant to vegetative GDEs. Table 4-5 summarizes the RMS well construction details and Table 4-6 summarizes the RMS well location details. .

Table 4-5: Groundwater Levels Representative Monitoring Site Well Construction Details

RMS Well ID	State Well Number (Site Name)	Total Depth (feet bgs)	Screened Interval (feet bgs)	Reference Point Elevation[1] (feet)	Reference Point Description	Ground Surface Elevation[1] (feet)
Wyandotte Creek Subbasin – Oroville Management Area						
16Q001M	19N03E**16Q001M**	120	100-120	180.32	Top of casing	179.32
32P001M	19N04E**32P001M**	150	N/A	188	Between plate and casing on west side	187
PWS-03	PWS-03	150	---	161	---	---
Wyandotte Creek Subbasin – South Management Area						
13B002M	17N03E**13B002M**	320	120-320	89.57	Top of casing	89.27
22B001M	17N04E**22B001M**	80	55-80	118.26	Top of casing	117.26
25N001M	18N03E**25N001M**	164	81-164	128.26	Top of casing	127.26

RMS Well ID	State Well Number (Site Name)	Total Depth (feet bgs)	Screened Interval (feet bgs)	Reference Point Elevation[1] (feet)	Reference Point Description	Ground Surface Elevation[1] (feet)
08M001M	18N04E**08M001M**	350	168-244	147.56	Between metal plate and top of casing	147.26
16C001M	18N04E**16C001M**	165	65-165	204.46	Top of casing	203.26
19D003M	18N04E**19D003M**	944	120-200	124	N/A	124
31F001M	19N04E**31F001M**	200	160-200	260.97	Top of casing	259.27

Notes:

[1] North American Vertical Datum 1988.

N/A – Not available

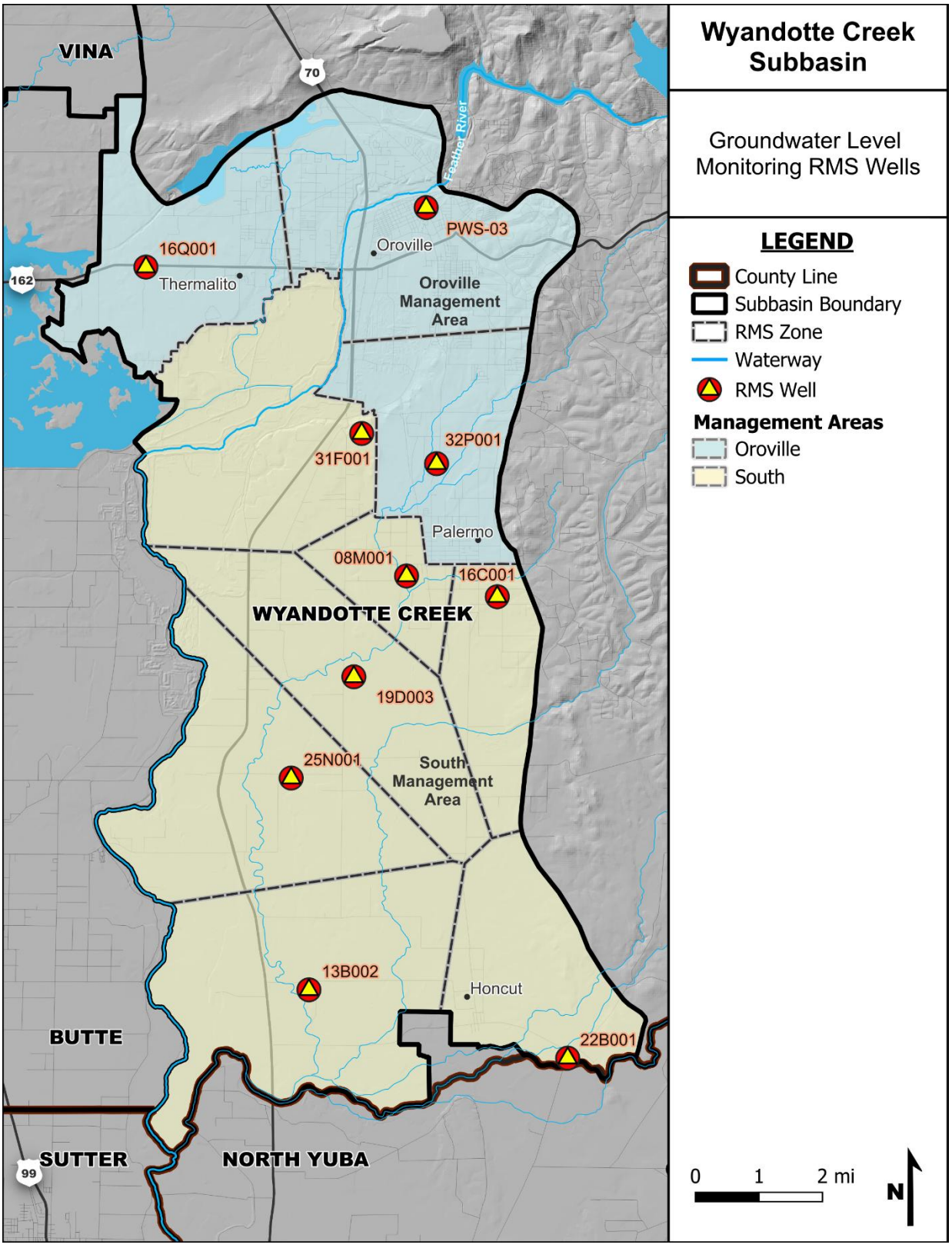


Figure 4-5. Groundwater Level Representative Monitoring Site (RMS) Wells

Table 4-6: Groundwater Levels Representative Monitoring Site Well Location Details

RMS Well ID	State Well Number (Site Name)	Latitude[1]	Longitude[1]
Wyandotte Creek Subbasin – Oroville Management Area			
16Q001M	19N03E**16Q001M**	39.4977	-121.6369
32P001M	19N04E**32P001M**	39.4540	-121.5503
PWS-03	PWS-03	---	---
Wyandotte Creek Subbasin – South Management Area			
13B002M	17N03E**13B002M**	39.3336	-121.5853
22B001M	17N04E**22B001M**	39.319	-121.5089
25N001M	18N03E**25N001M**	39.3818	-121.59156
16C001M	18N04E**16C001M**	39.4239	-121.5318
08M001M	18N04E**08M001M**	39.4283	-121.5586
19D003M	18N04E**19D003M**	39.40512	-121.57362
31F001M	19N04E**31F001M**	39.4606	-121.5725

Notes:
[1] North American Datum 1983 (NAD83).

4.9.2 Water Quality

The revised monitoring network includes four of the eight original RMS sites identified in the 2022 GSP. Four original RMS wells identified in the GSP were removed from the monitoring network for the following reasons:

- Two RMS wells were removed from the network per the request of the landowners, 28L001M in 2022 and 16Q001M in 2023.
- RMS well 13B002M was removed from the monitoring network in 2022 due to an inoperable pump.
- Well PWS-02 was removed in 2023 due to water quality issues at the well.

Well 06E002M was added in 2022. This well was historically measured for groundwater quality as part of the former Butte County Basin Management Objective (BMO) program. One more additional well, 09N002M was added into the monitoring network in 2023. This well also serves as an existing RMS well for groundwater level monitoring in the Subbasin. As of 2026, there are six (6) completions over four (4) locations being monitored within Wyandotte Creek GSA.

The revised RMS network currently has six completions over four locations, which were selected as compliance points for monitoring of water quality (Figure 4-6). They will be monitored for the SMC listed in Section 3.9. Each well was selected independently of the wells discussed in Section 4.4 and thus not all wells are listed in Table 4-6. Table 4-8 summarizes the well construction details and Table 4-9 summarizes the well location details. As discussed in Section 4.2, one of these wells, designated as 19D001M, 19D002M, and 19D003M, was currently installed, as shown in Figure 4-6 by DWR under the TSS program.

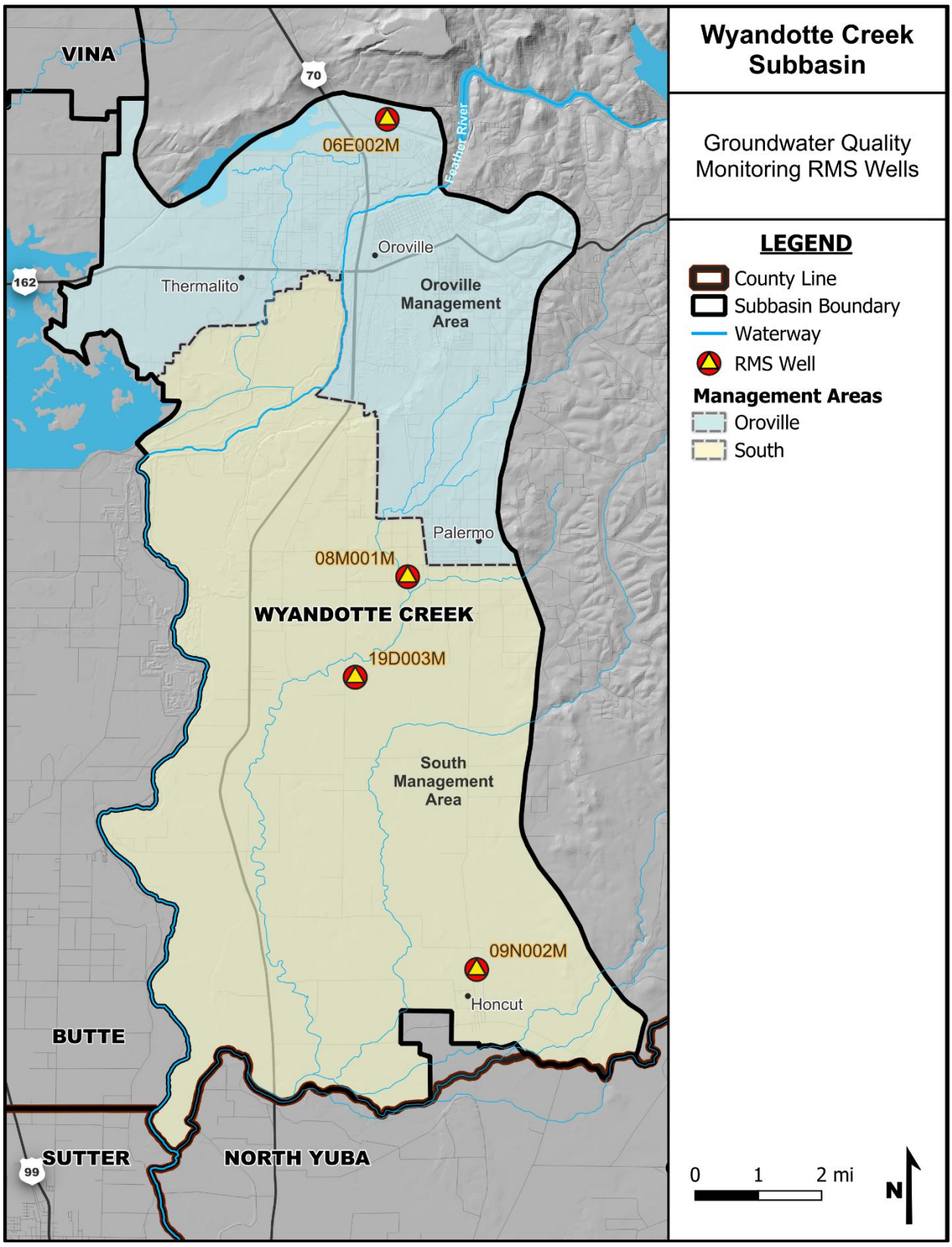


Figure 4-6. Groundwater Quality Representative Monitoring Site (RMS) Wells

Table 4-7: Water Quality Representative Monitoring Site Well Construction Details

RMS Well ID	State Well Number (Site Name)	Total Depth (feet bgs)	Screen Interval (feet bgs)	Reference Point Elevation[1] (feet)	Reference Point Description	Ground Surface Elevation[1] (feet)
Wyandotte Creek Subbasin – Oroville Management Area						
06E002M	19N04E**06E002M**	196	110 – 130, 164 – 174	N/A	N/A	N/A
Wyandotte Creek Subbasin – South Management Area						
09N002M	17N04E**09N002M**[3]	325	100 – 112	103.26	N/A	102.26
08M001M	18N04E**08M001M**	656	168-244	147.56	Between metal plate and top of casing	147.26
19D003M	18N04E**19D003M**[2]	220	120-130, 190-200	124	NR	124

Notes:
[1] North American Datum 1983 (NAD83).
[2] Nested well installed by DWR under TSS Program.
[3] If access cannot be obtained for this well, a new well will be obtained.
--- Details of public supply wells not disclosed
N/A – Not available
NR – Not yet reported by DWR

Table 4-8: Water Quality Representative Monitoring Site Well Location Details

RMS Well ID	State Well Number (Site Name)	Latitude[1]	Longitude[1]
Wyandotte Creek Subbasin – Oroville Management Area			
06E002M	19N04E**06E002M**	39.53288	-121.566864
Wyandotte Creek Subbasin – South Management Area			
08M001M	18N04E**08M001M**[2]	39.4283	-121.5586
09N002M	17N04E**09N002M**	39.3387	-121.5363
19D003M	18N04E**19D003M**	39.40512	-121.57363

Note:
[1]. North American Datum 1983 (NAD83).
[2]. If access cannot be obtained for this well, a new well will be obtained.
N/A – Not available

4.9.3 Land Subsidence

The subsidence RMS network consists of 32 monitoring well and InSAR pixel pairs, ground-truthed with available GPS subsidence station(s). InSAR pixels are chosen near selected groundwater level monitoring site in the RMS network. If subsidence should occur, the GSA will check the groundwater levels of the paired groundwater well to determine if the subsidence is natural or from declining groundwater levels. InSAR pixels and GPSGPS subsidence stations are shown in Table 4-10 and Figure 4-7.

The quantitative metric for assessment of subsidence SMCs will use the average value of InSAR pixels around each RMS well. InSAR data will be downloaded, plotted, and analyzed annually as part of the GSP Annual Report. Both rates and cumulative extents of subsidence at each RMS site will be assessed to determine compliance with the MT described above.

Table 4-9: Land Subsidence RMS Monitoring Network

Site ID	Site Type	Paired RMS Well – Well ID	Years of Record	Measurement Type	Basis of Selection
Wyandotte Creek – Oroville Management Area					
16Q001M	InSAR pixel	16Q001M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
32P001M	InSAR pixel	32P001M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
PWS-01	InSAR pixel	PWS-01	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
PWS-02	InSAR pixel	PWS-02	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
PWS-03	InSAR pixel	PWS-03	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
S1[1]	InSAR pixel	S1[2]	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
Wyandotte Creek – South Management Area					
03D001M	InSAR pixel	03D001M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
13B002M	InSAR pixel	13B002M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
09N002M	InSAR pixel	09N002M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
22B001M	InSAR pixel	22B001M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
25N001M	InSAR pixel	25N001M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
08M001M	InSAR pixel	08M001M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
16C001M	InSAR pixel	16C001M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
19D001M	InSAR pixel	19D001M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well

Site ID	Site Type	Paired RMS Well – Well ID	Years of Record	Measurement Type	Basis of Selection
19D002M	InSAR pixel	19D002M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
19D003M	InSAR pixel	19D003M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
31F001M	InSAR pixel	31F001M	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
M1[1]	InSAR pixel	M1[1]	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
S2[1]	InSAR pixel	S2[1]	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
S7[1]	InSAR pixel	S7[1]	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
S10[1]	InSAR pixel	S10[1]	2015-Present	Vertical Ground Surface Displacement	Proximity to GWL well
PMO	GPS Station	PMO	2021-Present	Vertical Ground Surface Displacement	

[1] Installed February / March 2026.

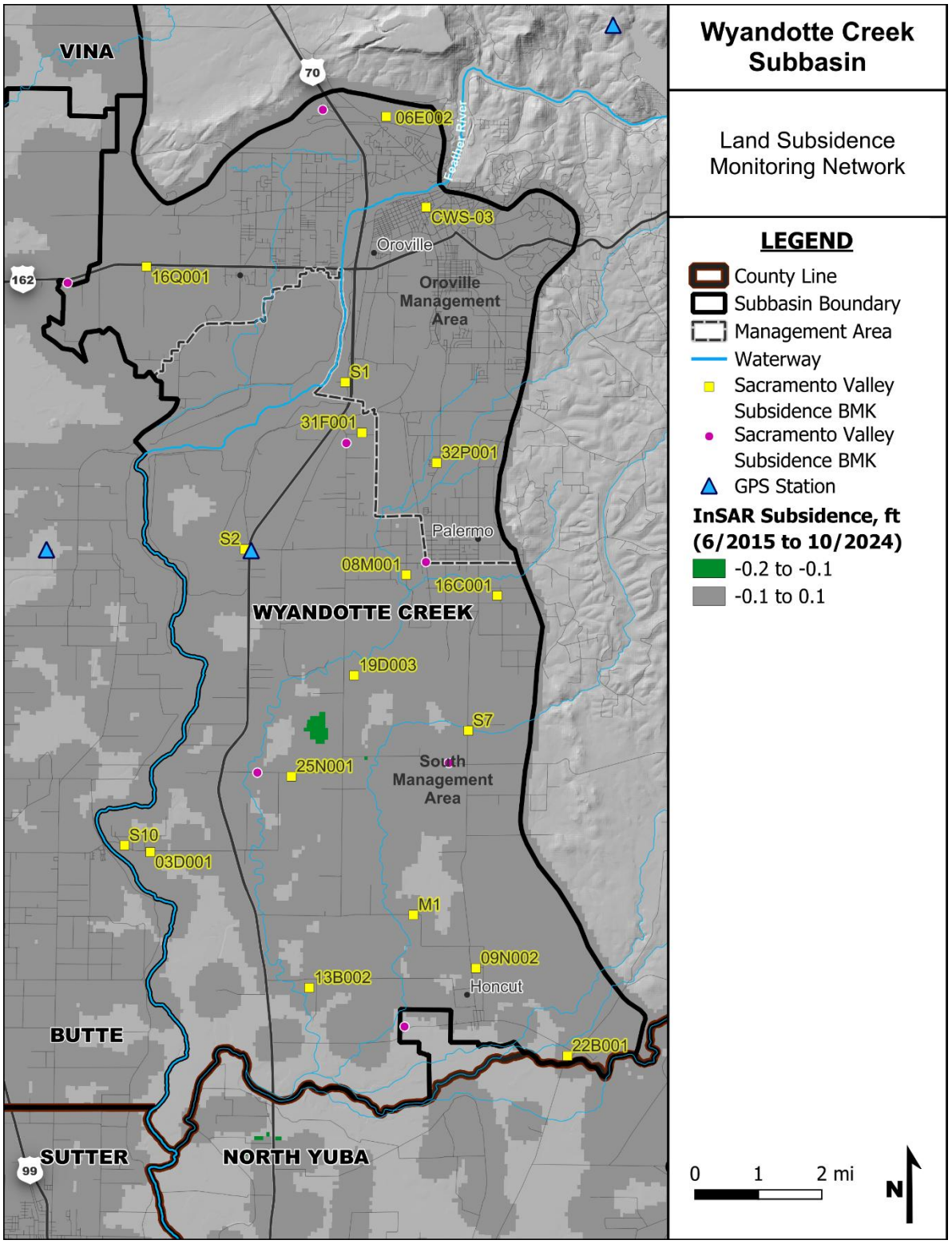


Figure 4-7. Land Subsidence Monitoring Network

4.9.4 Interconnected Surface Waters

The preliminary ISWISW RMS network consists of three (3) monitoring wells, selected due to their proximity to existing stream gages and ISWs. RMS wells are shown in Table 4-10 and Figure 4-8. The finalized ISW SMCs are still in development and may be reconsidered in the 2032 periodic evaluation.

The RMS selection process includes the following:

1. Compile a comprehensive list of possible monitoring wells representative of groundwater table conditions in relation to surface water features.
2. Classify monitoring wells based on well lithology and screening intervals.
3. Review data quality and condition of all possible monitoring wells (e.g., presence of oil).
4. Consistent, high-quality spring and fall measurements for at least the past 5 years.
5. Map beneficial users (ISWs).
6. Select RMS based on proximity to sensitive beneficial uses/users of groundwater:
    a. ISW: within 0.5 miles of an identified ISW

Table 4-10: Interconnected Surface Waters Representative Monitoring Site Well Construction Details

RMS Well ID	State Well Number (Site Name)	Total Depth (feet bgs)	Screened Interval (feet bgs)	Reference Point Elevation[1] (feet)	Reference Point Description	Ground Surface Elevation[1] (feet)
Wyandotte Creek Subbasin – Oroville Management Area						
PWS-03	PWS-03	150	---	161	---	---
Wyandotte Creek Subbasin – South Management Area						
03D001M	17N03E**03D001M**	179	35-105	99.27	One inch pipe east side of pump base.	97.27
22B001M	17N04E**22B001M**	80	55-80	118.26	Top of casing	117.26

Notes:
[1] North American Vertical Datum 1988.
N/A – Not available
--- Details of public supply wells not disclosed

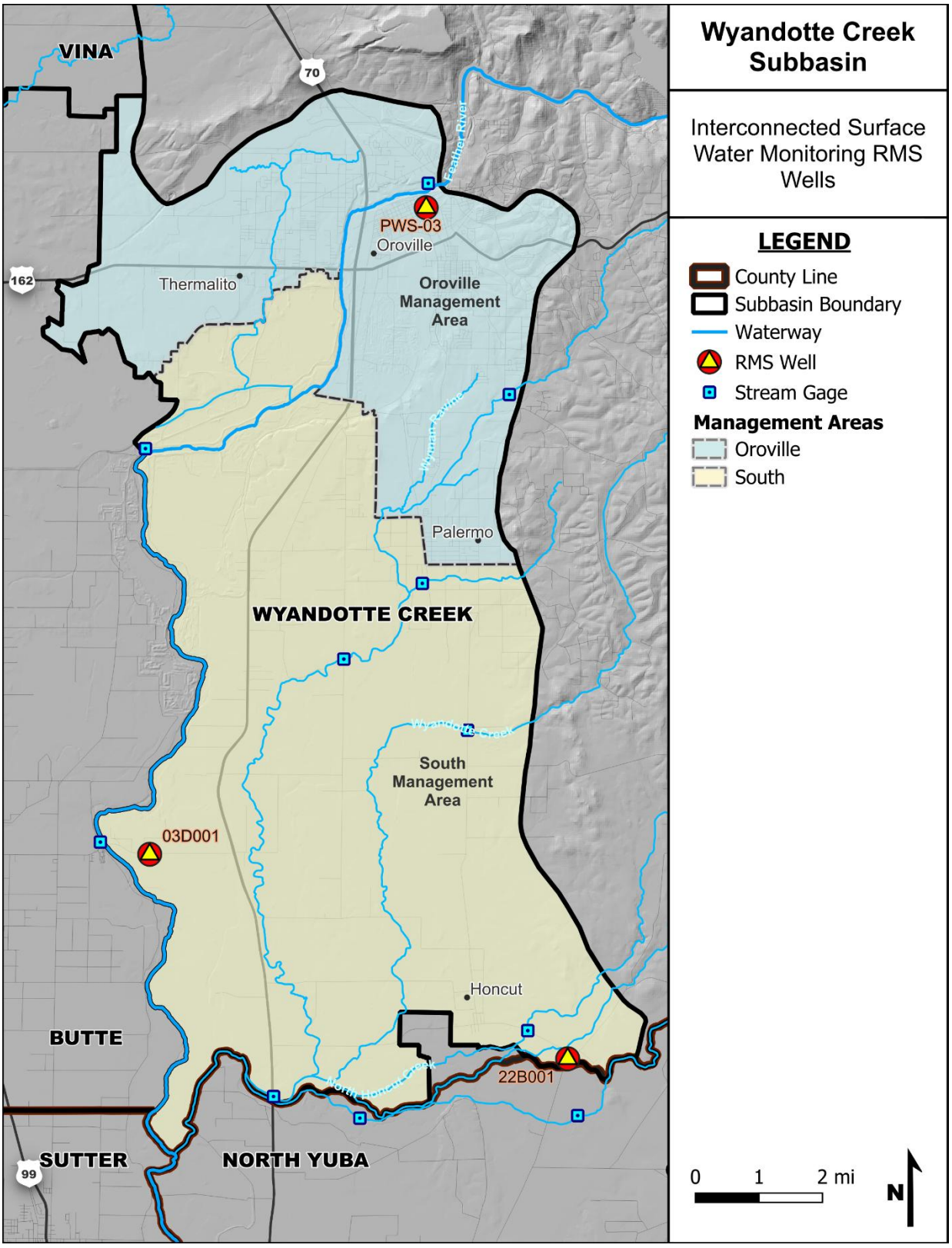


Figure 4-8: ISW Preliminary Representative Monitoring Site Network

4.10 Network Assessment and Improvements

An assessment of the monitoring network is required to determine uncertainty and identify data gaps that could affect the achievement of sustainability goals. Improvements to the network to address data gaps will be planned and implemented to manage, focus, and prioritize monitoring.

Data gaps can result from monitoring information that is not of sufficient quantity or quality. Monitoring network data gaps can influence the development and understanding of the basin setting, including the HCM, groundwater conditions, and water budget; and proposed MTs and MOs. Updates to the data gaps will be included in the Periodic Evaluations of the GSP.

The following data gaps and proposed resolutions have been identified in the Wyandotte Creek Subbasin:

- Interconnected Surface Water and GDEs – There is limited data to analyze interaction of streams and pumping within the primary aquifer system. There is also limited data to assess groundwater level conditions in conditions in relation to GDEs. Additional wells and stream gages have been installed, as appropriate, following the framework discussed in Section 3.8. Within the 2027-2032 evaluation period, data will continue to be collected from the groundwater level and ISW networks to address this data gap.

5. PROJECT AND MANAGEMENT ACTIONS

This section includes relevant information about projects and management actions to satisfy CCR Title 23 § 354.42 and 354.44. The projects and management actions described in this section will help achieve the Wyandotte Creek Subbasin's sustainability goal.

5.1 Projects, Management Actions, and Adaptive Management Strategies

The sustainability goal of the Wyandotte Creek Subbasin is to maintain a sufficient groundwater supply and quality that can be used by rural areas, communities, and agricultural users. Therefore, the overall approach will focus on investigating additional water sources to supplement groundwater and implementing various conservation programs. The projects described below were selected with this approach in mind.

5.2 Projects

5.2.1 Project Identification

Projects were identified through an outreach effort involving the WAC and the Wyandotte Creek GSA. The process included soliciting input from governmental agencies, water purveyors, local organizations, and local landowners. The GSA website allowed project proponents to input the available information on each project.

The majority of projects submitted were proposed by the Wyandotte Creek GSA. Some of the projects also include other proponents, such as the TWSD and SFWPA. The list of proponents and other potential entities involved in the projects is included in Tables 5-1, 5-2, and 5-3 below.

The provided project information was compiled into an initial draft list with similar and overlapping projects combined as appropriate. The draft list was presented to the WAC and to the GSA Boards. The projects were evaluated based on the following priorities:

- Project addresses one or more of the Undesirable Results
- Project is implementable with respect to technical complexity, regulatory complexity, institutional consideration, and public acceptance
- Project is implementable within the SGMA timeframe
- Project benefits Underrepresented Communities (URCs)
- Project is in an area where water quality is suitable for use

5.2.2 Project Implementation

Projects will be implemented through the individual project proponent(s) with the Wyandotte Creek GSA providing oversight. The GSA oversight may vary from acknowledging the implementation of the project to actively participating in the design and construction of the project or being the project proponent for some projects. The GSA will track the estimated effect on the water budget from projects annually.

5.2.3 List of Projects

Several projects to achieve the Wyandotte Creek Subbasin's sustainability goal were identified. The initial set of projects was reviewed by the WAC. A final list of 15 possible projects is included in this GSP and they are categorized into four project types: direct recharge, water

supply/conjunctive use, intra-basin water transfers, and demand conservation. Projects are further classified into four categories based on project status: Completed, In-Progress, Potential, and Other as defined below.

- Completed – Projects in this category are finished and benefits have been reported
- In-Progress Projects – Projects in this category are in the planning, design, or implementation phase and may require funding to proceed
- Potential Projects – Projects in this category have been developed and are ready to be implemented as needed/funded
- Other Projects – Projects in this category potentially are potentially led by other agencies and not critical to achieving sustainability. Status will be tracked by the GSA as feasible (not subject to annual tracking and reporting).

Completed, In-Progress, and Potential Projects have been prioritized by the GSA. Projects may be moved between categories as prioritized and implementation status advances.

This subsection of the GSP satisfies the requirements of CCR Title 23 § 354.44. Consistent with SGMA requirements, the project descriptions contain information regarding:

- The MO benefitted by the project
- Permitting and regulatory processes
- Timetable for initiation and completion
- Expected benefits
- How the project will be accomplished
- Legal authority
- Estimated costs and plans to meet costs
- Implementation circumstances
- Public noticing

Tables 5-1, 5-2, 5-3, and 5-4 provide a summary of the 15 projects. Full descriptions are included below.

Table 5-1: List of Completed Projects

Project Name	Project Type	Project Proponent(s)/ Potential Participating Entities	Measurable Objective Expected to Benefit	Estimated Costs	Required Permitting and Regulatory Process	Observed Groundwater Demand Reduction (Acre-Feet/Year)
5.2.4.1 TWSD Water Treatment Plant Capacity Upgrade	Conservation	TWSD, DWR, Division of Drinking Water	Groundwater Levels, Groundwater Storage, Water Quality, Land Subsidence	$1.5 million-$3 million	Completed	300

Table 5-2: List of In-Progress Projects

Project Name	Project Type	Project Proponent(s)/ Potential Participating Entities	Measurable Objective Expected to Benefit	Current Status	Timetable (initiation and completion)	Estimated Costs	Required Permitting and Regulatory Process	Expected Groundwater Demand Reduction (Acre-Feet/Year)
5.2.5.1 Residential Water Conservation	Conservation	Wyandotte Creek GSA, municipal water providers	Groundwater Levels, Groundwater Storage	Ongoing	2022-2025	To be decided (TBD)	N/A	100 – 200
5.2.5.2 Palermo Clean Water Consolidation Project	Water Supply/Conjunctive Use	Butte County Department Water and Resource Conservation, SFWPA, Palermo Community Council	Groundwater Levels, Groundwater Storage	Implementation	Expected 2026	$12.4 million	Permitting completed.	500+
5.2.5.3 Regional	Direct Recharge, Water	Wyandotte Creek GSA, Agricultural	Groundwater Levels, Groundwater	Planning and Design	Expected 2032	$3 million	SWRCB Water Right Permit,	Up to 3,000

Project Name	Project Type	Project Proponent(s)/ Potential Participating Entities	Measurable Objective Expected to Benefit	Current Status	Timetable (initiation and completion)	Estimated Costs	Required Permitting and Regulatory Process	Expected Groundwater Demand Reduction (Acre-Feet/Year)
Conjunctive Use Project	Supply/Conjunctive Use	Groundwater Users of Butte County, Farm Bureau, SFWPA, DWR	Storage, Water Quality, Land Subsidence				California Environmental Quality Act (CEQA)	

Table 5-3: List of Potential Projects

Project Name	Project Type	Project Proponent/ Potential Participating Entities	Measurable Objective Expected to Benefit	Current Status	Timetable (initiation and completion)	Estimated Costs	Required Permitting and Regulatory Process	Expected Groundwater Demand Reduction (AFY)
5.2.7.2 Extend Orchard Replacement	Conservation	Wyandotte Creek GSA, Butte County	Groundwater Levels	Planning Stage	Dependent upon availability of financial incentives and willingness of growers to participate	TBD	N/AA	TBD

Table 5-4: List of Other Projects

Project Name	Project Type	Project Proponent/ Potential Participating Entities	Measurable Objective Expected to Benefit	Current Status	Timetable (initiation and completion)	Estimated Costs	Required Permitting and Regulatory Process	Expected Groundwater Demand Reduction (AFY)
5.2.7.1 Agricultural Irrigation Efficiency	Conservation	Agricultural Groundwater Users of Butte County, Butte County Farm Bureau	Groundwater Storage	Planning Stage	TBD	TBD	TBD	4,000
5.2.7.1 Oroville Wildlife Area Robinson's Riffle Project	Direct Recharge	Sutter Butte Flood Control Agency, Golden State Salmon Association	Groundwater Levels, Groundwater Storage, Water Quality, Land Subsidence	Planning Stage	TBD; Sutter Butte Flood Control Agency (SBFCA) is currently seeking funding	$1.7 million (planning, design, environmental, permitting)	CEQA/National Environmental Policy Act (NEPA), United States Army Corps of Engineers (USACE) 408, USACE 404, CDFW ITP, CDFW 1600 LSAA, State Lands Commission Lease, CVRWQCB 401, CVFPB Encroachment Permit, DWR Encroachment Permit	TBD
5.2.7.3 Streamflow Augmentation	Direct Recharge, Water Supply/ Conjunctive Use	Wyandotte Creek GSA, PG&E, surface water rights holders	Groundwater Levels, Surface Water Depletion	Planning Stage	2027-2042	$50-100 per acre-foot	SWRCB Water Right Permit, CEQA	1,000-5,000
5.2.7.4 Water Loss Monitoring	Conservation	Wyandotte Creek GSA /SFWPA, Butte County	Surface Water Depletion	Planning Stage	2027-2042	$800,000	TBD	Unknown
5.2.7.5 Well Upgrades	Conservation	TWSD, DWR, Butte County,	Groundwater Levels, Groundwater	Planning Stage	2027-2042	TBD	TBD	TBD

Project Name	Project Type	Project Proponent/ Potential Participating Entities	Measurable Objective Expected to Benefit	Current Status	Timetable (initiation and completion)	Estimated Costs	Required Permitting and Regulatory Process	Expected Groundwater Demand Reduction (AFY)
		Wyandotte Creek GSA	Storage, Water Quality, Land Subsidence					
5.2.7.6 Fuel Management for Watershed Health	Conservation	Wyandotte Creek GSA, Butte County Fire Safe Council, Butte County Resource Conservation District, NRCS	Groundwater Levels, Groundwater Storage, Water Quality, Surface Water Depletion	Planning Stage	2027-2042	TBD	CEQA	TBD
5.2.7.7 Removal of Invasive Species	Conservation	Wyandotte Creek GSA; other local, state, federal organizations and agencies	Groundwater Levels	Planning Stage	2027-2042	TBD	CEQA and/or NEPA (depending on project location and impact)	TBD
5.2.7.8 Recharge Well (Injection Well)	Direct Recharge	TWSD, DWR, Butte County, Wyandotte Creek GSA	Groundwater Levels, Groundwater Storage, Water Quality, Land Subsidence	Planning Stage	2027-2042	TBD	TBD	TBD

5.2.4 Completed Projects

Projects categorized as Completed Projects have been completed by the Wyandotte Creek GSA or partner agency. Completed Projects are summarized in Table 5-1.

5.2.4.1 TWSD Water Treatment Plant Capacity Upgrade

The TWSD has increased the capacity of the water treatment plant serving the city of Oroville and surrounding area. By treating a greater volume of water for the area, the amount of groundwater pumped for drinking water has decreased.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA / TWSD, Division of Drinking Water, DWR
Project Type:	Conservation
Groundwater Offset and/or Recharge:	300 acre-feet/year

Measurable Objective Expected to Benefit: Groundwater Levels, Groundwater Storage, Water Quality, Land Subsidence

Project Status: This project was completed in 20242024.

Required Permitting and Regulatory Process: Division of Drinking Water, DWR.

Expected Benefits and Evaluation: Since groundwater is a significant contributor to drinking water in the city of Oroville and the Wyandotte Creek Subbasin, increasing the capacity of the treatment plant will reduce the impact of groundwater pumping.

How Project Will Be Accomplished/Evaluation of Water Source: This project is a demand-side conservation project by TWSD. No additional water source will be utilized for this project.

Legal Authority: The project was conducted by the TWSD and Wyandotte Creek GSA.

Actual Costs and Method to Meet Costs: $1.5-$3 million; funding source DWR SGM Round 2 grant funds.

Trigger for Implementation and Termination: Increased groundwater pumping for drinking water.

Process for Determining Conditions Requiring the Project to have Occurred: This is completed due to securing DWR funding.

5.2.5 In-Progress Projects

Projects categorized as In-Progress Projects are ongoing or currently in the pilot, design, or implementation phase under the Wyandotte Creek GSA or partner agency. In-Progress Projects are summarized in Table 5-2.

5.2.5.1 Residential Water Conservation

Municipal water providers, who currently supply water to the City of Oroville and others throughout Butte County, are planning to implement water conservation practices in accordance with their 2020 UWMP. Some of these conservation projects include the installation of low flow fixtures, toilet replacements, urinal valve and bowl replacements, clothes washer replacements,

residential conservation kits, smart controllers, and high efficiency irrigation nozzles. Other projects include water waste prevention ordinances, metering, conservation pricing, public education and outreach, programs to assess and manage distribution system real loss, water conservation program coordination and staffing support, and other demand management measures.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA / Municipal water providers (including Cal Water Oroville, TWSD)
Project Type:	Conservation
Estimated Groundwater Offset and/or Recharge:	100 – 200 AFY

Measurable Objective Expected to Benefit: Groundwater Levels, Groundwater Storage

Project Status: This project is currently in the planning stages.

Required Permitting and Regulatory Process: N/A

Timetable for Initiation and Completion: 2022-2025

Expected Benefits and Evaluation: As groundwater is the primary source of water for the region, these various conservation projects will reduce groundwater demand, allowing groundwater levels and overall storage to recover.

How Project Will Be Accomplished/Evaluation of Water Source: This project is a demand-side conservation project conducted by municipal water service providers. No additional water source will be utilized for this project.

Legal Authority: The project would be conducted by municipal water service providers in the City of Oroville and other municipalities in the Wyandotte Creek Subbasin.

Estimated Costs and Plans to Meet Costs: TBD; funding via grants and local entities.

Circumstances for Implementation: This project is a Planned Project that is anticipated to move forward.

Trigger for Implementation and Termination: Increased water demand from planned developments in the City of Oroville and Butte County General Plans.

Process for Determining Conditions Requiring the Project to have Occurred: Not applicable; this is a Planned Project that is anticipated to move forward.

5.2.5.2 Palermo Clean Water Consolidation Project

The water quality in the unincorporated community of Palermo is currently a public health concern for its nearly 2,000 residents. Most of the population obtain their potable water from individual water wells and use septic systems for wastewater treatment and disposal. The area's predominant soil type prevents surface water from properly percolating and draining, causing frequent flooding and the surfacing of untreated wastewater effluent. This, in turn, leads to septic system failures, plumbing back-ups into homes, and possible cross-contamination of pathogens in untreated wastewater with drinking water sources in the aquifer. Under this project, the

SFWPA would expand its service areas and water delivery capabilities to provide treated drinking water to Palermo residents.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA, Butte County Department Water and Resource Conservation, SFWPA, Palermo Community Council
Project Type:	Water Supply/Conjunctive Use
Estimated Groundwater Offset and/or Recharge:	500+ acre-feet/year

Measurable Objective Expected to Benefit: Groundwater Levels, Groundwater Storage, Water Quality

Project Status: The first phase, the Dry Well Consolidation Project, is in progress focusing on installing pipelines and connecting properties. It's a multi-year effort, with construction progressing as funding allows, aiming to serve hundreds of parcels. Funding is being sought from multiple grant sources to fully fund the project.

Required Permitting and Regulatory Process: LAFCO and Butte County.

Timetable for Initiation and Completion: Project design is completed, funding is secured, and implementation is underway and is expected to be completed in 2026.

Expected Benefits and Evaluation: Expanding the SFWPA service areas in Palermo would provide more residents with clean and safe drinking water using a surface water source and will reduce dependence on groundwater pumping wells that may be contaminated. This would also allow groundwater levels and water quality in the region to recover. This project will improve the resilience of drinking water supplies to households in Palermo.

How Project Will Be Accomplished/Evaluation of Water Source: This project is a supply side conjunctive use project conducted by the BCDWRC in partnership with SFWPA. Water will be supplied by surface water from SFWPA.

Legal Authority: The project would be under the authority of BCDWRC, SFWPA, and Wyandotte Creek GSA.

Estimated Costs and Plans to Meet Costs: $12.4 million met through multiple grant sources

Circumstances for Implementation: Implementation is currently underway with expected completion date within 2026.

Trigger for Implementation and Termination: Dependence on individual groundwater pumping wells for drinking water and frequent issues such as flooding, plumbing problems, and possible cross contamination.

Process for Determining Conditions Requiring the Project to have Occurred: Implementation is currently underway. This is a high priority project for the Wyandotte Creek GSA and partnering agencies.

5.2.5.3 Regional Conjunctive Use Project

In the 2018 "Evaluation of Restoration and Recharge Within Butte County Basins," Butte County identified surface water sources that could be diverted to fields, recharge basins, and/or recharge ponds in both the Vina and Wyandotte Creek Subbasins. For Wyandotte Creek, the main source of surface water would come from Lake Oroville, while other sources are owned by water right holders in the Wyandotte Creek Subbasin and upper watershed. Under this project, excess surface water supplies would be used in place of groundwater in both agricultural and Flood MAR applications to allow groundwater levels in the Wyandotte Creek Subbasin to recover. Agricultural users may need a dual irrigation system that allows them to use surface water and switch to groundwater when surface water is not available. Feasible Flood MAR projects that have already identified include the Wyandotte Creek, Wyman Ravine, Wilson Creek, North Honcut Creek, Feather River, and Ruddy Creek, and will utilize water from the seasonal high flows from these creeks and streams for rice fields that have historically relied on groundwater, managed habitat, recharge ponds, and recharge basins. Recharge along Wyman Ravine, conducted in coordination with SFWPA and the Palermo Master Drainage Plan, has been determined to be most feasible. Work is currently underway to advance project concepts and designs.

The Regional Conjunctive Use Project combines the scopes of the Flood MAR, Intra-Basin Water Transfer, and Agricultural Surface Water Supplies projects that were described in the 2022 GSP.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA / TWSD, Butte County, agricultural users
Project Type:	Water supply/Conjunctive Use
Estimated Groundwater Offset and/or Recharge:	up to 4,000 AFY

Measurable Objective Expected to Benefit: Groundwater Levels, Groundwater Storage, Water Quality, Land Subsidence

Project Status: This project is an ongoing project and the feasibility and 60% designs completed.

Required Permitting and Regulatory Process: DWR, Butte Count, California SWRCB Water Right Permit, CEQA

Timetable for Initiation and Completion: 2024-2032

Expected Benefits and Evaluation: Utilization of flood waters and intra-basin water transfers to increase the surface water supply in the basin will offset groundwater pumping and allow groundwater levels and volume to recover.

How Project Will Be Accomplished/Evaluation of Water Source: This project is a direct recharge and water supply/conjunctive use project. The water would be supplied by surface water from SFWPA and floodwater that has historically accumulated in Palermo.

Legal Authority: The project would be under the authority of SFWPASFWPA and the Wyandotte Creek GSA. Additional evaluation of water rights may be necessary as projects move forward.

Estimated Costs and Plans to Meet Costs: TBD; likely funding via Proposition 4 or privately funded by willing landowners.

Circumstances for Implementation: This project is an Ongoing Project, meaning it is currently being worked on. The project will be implemented once additional grant funds have been secured.

Trigger for Implementation and Termination: Availability of water sources and negotiations with water suppliers and landowners.

Process for Determining Conditions Requiring the Project to have Occurred: This is an Ongoing Project that is anticipated to move forward due to strong stakeholder support.

Potential Projects

5.2.6 Potential Projects

Projects categorized as Potential Projects are currently in the planning stages and may move forward if funding becomes available or if they become necessary to achieve sustainability. The Potential Projects are presented in Table 5-3.

5.2.6.1 Extend Orchard Replacement

Under this project, various funding sources would incentivize local growers to increase the duration of their current fallowing practice between orchard removal and replanting by one growing season. The extra time would allow the soil to fallow and decrease the overall demand on groundwater and other water sources. Additionally, this program may also reduce the need for soil treatments such as fumigation and expand recycling options for the previous orchard. This project has the potential to fallow many acres although it is not determined at this time. As envisioned, this project would be dependent on the availability of financial incentives and willingness of landowners to participate. Participation in the program would be voluntary.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA / Butte County
Project Type:	Conservation
Estimated Groundwater Offset and/or Recharge:	TBD

Measurable Objective Expected to Benefit: Groundwater Levels

Project Status: This project is still in the early conceptual planning stages.

Required Permitting and Regulatory Process: None

Timetable for Initiation and Completion: To be determined. The timetable would be dependent on the availability of financial incentives and willingness of farmers to participate.

Expected Benefits and Evaluation: By increasing the time between orchard removal and replanting, the soil may be allowed to fallow, restoring its fertility, and decreasing its water demand. This would decrease the overall use of groundwater in the Subbasin.

How Project Will Be Accomplished/Evaluation of Water Source: This project is a demand-side conservation project. No additional water source will be utilized for this project.

Legal Authority: The project would be under the Wyandotte Creek GSA, local landowners and other entities to be determined.

Estimated Costs and Plans to Meet Costs: To be determined; funding via Proposition 1, Proposition 68, USDA, National Resource Conservation Service (NRCS)

Circumstances for Implementation: This project is a Conceptual project in the early conceptual planning stages and would require significant additional work to move forward.

Trigger for Implementation and Termination: None

Process for Determining Conditions Requiring the Project to Occur: The project proponents are in the process of determining the feasibility of this project including the possibility of securing the necessary finances to move forward.

5.2.7 Other Projects

Projects categorized as Other Projects may have benefits to groundwater conditions but are not part of the GSA's strategy to maintain/achieve sustainability. Other Projects are not being led by the GSA, but will still be tracked, as feasible. These Other Projects are presented in Table 5-44.

5.2.7.1 Agricultural Irrigation Efficiency

A survey is currently being conducted in North and South Vina by the Vina GSA, Agricultural Groundwater Users of Butte County, and Butte County Farm Bureau in order to evaluate current irrigation methods and practices, identify opportunities and methods to improve irrigation efficiency, determine potential issues preventing the adoption of efficiency practices, and provide recommendations for increasing participation in these practices. The results of this survey are expected to be available in September 2022, with implementation of the project expected to be initiated between 2024 and 2030. Recommendations from the survey will be made available to the local agricultural community, and implementation of the practices will be voluntary. The Wyandotte Creek GSA along with participating partners will pursue grant funds to help implement these practices. It is estimated that the adoption of more efficient practices could reduce groundwater demand by up to 2%, which translates to a reduction in groundwater demand of up to 4,000 AFY.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA, Vina GSA, Agricultural Groundwater Users of Butte County, Butte County Farm Bureau
Project Type:	Conservation
Estimated Groundwater Offset and/or Recharge:	4,000 AFY

5.2.7.2 Oroville Wildlife Area Robinson's Riffle Project

The Robinson's Riffle Project is a major restoration project for the Oroville Wildlife Area, a 12,000-acre area located in Butte County and managed by DWR and the CDFW. Under this project, the Feather River would undergo major grading improvements that would lower the floodplain surface to a more naturalized condition by excavating tailing piles, reconnect the overbank areas to the main channel, and create new side-channel and floodplain habitat. This work would increase the overall area of riverine habitat, thereby improving the flow and quality of the water, removing invasive species along the banks, and increasing the surface available for recharge into the aquifer during flood events. Additionally, increasing the overall streamflow in the river will benefit several local species. Necessary permits will be obtained by the SBFCA, in partnership with DWR and CDFW. SBFCA is in the process of conducting a series of workshops, during which they will share details of the project with potential stakeholders and resource agencies and obtain the necessary funding to move forward.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA / SBFCA, Golden State Salmon Association
Project Type:	Direct Recharge
Estimated Groundwater Offset and/or Recharge:	TBD

5.2.7.3 Streamflow Augmentation

Under this project, flood waters from water right holders in the region would be diverted to certain creeks or streams in the Wyandotte Creek Subbasin. This flood waters would be used for direct and water supply/conjunctive use to restore groundwater levels in the basin, as well as increase stream flows. The Wyandotte Creek GSA would head the project and initially conduct an investigation and feasibility study.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA / PG&E, surface water right holders
Project Type:	Direct Recharge, Water Supply/Conjunctive Use
Estimated Groundwater Offset and/or Recharge:	1,000-5,000 acre-feet/year

5.2.7.4 Water Loss Monitoring

The water providers across the Wyandotte Creek subbasin recognize that water loss across their systems due to unpermitted use. SFWPA, which provides service to cities such as Oroville and Palermo, has recognized that fire hydrants, which are primarily used for fire suppression, are being used for other unmonitored purposes. The extended use of fire hydrants is negatively affecting the amount of available surface water in the service area. The hydrants do not have meters on them, making it difficult to monitor usage when used by those without portable meters. Under this project, water providers would evaluate and implement procedures to track usage and water loss more accurately from their systems. This evaluation could include implementation of new practices to reduce unregulated use or even installation of meters on hydrants.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA/ SFWPA, Butte County
Project Type:	Conservation
Estimated Groundwater Offset and/or Recharge:	Unknown

5.2.7.5 Well Upgrades

Under this project, TWSD would install variable frequency drives and telemetry on its groundwater wells to better utilize groundwater and to document groundwater pumping.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA, TWSD, Butte County, DWR
Project Type:	Conservation
Estimated Groundwater Offset and/or Recharge:	TBD

5.2.7.6 Fuel Management for Watershed Health

Numerous fuel management projects would be implemented to protect various water sources in the Wyandotte Creek Subbasin and in the upper watershed of the Wyandotte Creek Subbasin and to better maintain overall watershed health. The implementation of fuel management projects in the Wyandotte Creek Subbasin will help with the protection of water bodies, maintaining quality and ensuring that those bodies can continue to be water sources for communities and agriculture.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA, Butte County Fire Safe Council, Butte County Resource Conservation District, NRCS
Project Type:	Conservation
Estimated Groundwater Offset and/or Recharge:	TBD

5.2.7.7 Removal of Invasive Species

Invasive species are a threat to the Wyandotte Creek Subbasin's ecosystem and water resources since they are known to consume water and hamper recharge. Under this project, invasive species and native grasses would be mapped to help track the effects these species have on water supplies and to help plan out future groundwater management actions. Following this initial mapping, management plans would be developed to establish groundwater management goals and propose actions towards the removal of invasive species. Appropriate funding mechanisms would be identified and secured to move the project forward.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA, local, state, and federal organizations and agencies
Project Type:	Conservation
Estimated Groundwater Offset and/or Recharge:	TBD

5.2.7.8 Recharge Well (Injection Well)

Under this project, the TWSD treatment plant would install an injection well that would inject raw and backwash water from its operations into the basin.

Project Summary	
Project Proponent / Other Potential Participating Entities:	Wyandotte Creek GSA /TWSD, Butte County, DWR
Project Type:	Direct Recharge
Estimated Groundwater Offset and/or Recharge:	TBD

5.2.8 Notification Process

The GSA will continue to conduct public outreach and will be responsible for notification of the projects. Regular updates will be provided to the GSA Boards and presented on the website (www.wyandottecreekgsa.com) as projects are implemented. Outreach is likely to be provided via public notices, meetings, website, social media, and email lists.

5.3 Management Actions

In order to achieve sustainable groundwater management, management actions can be implemented to focus on reduction of groundwater demand. The management actions can include increased data collection, education and outreach, regulatory policies, incentive programs, and enforcement actions. The GSA has prioritized the management actions by splitting them into two categories: potential management actions and other management actions.

The following sections will present management action options that the GSA may consider during GSP implementation. The GSA will monitor, participate, and coordinate with respective agencies for each of the Management Actions that may be considered. The schedule to implement the management actions is likely to vary depending upon Wyandotte Creek Subbasin conditions and the expected benefits may also vary year to year.

5.3.1 Potential Management Actions

Management Actions categorized as Potential Management Actions are currently in the planning stages and may move forward if funding becomes available or if they become necessary to prevent the occurrence of undesirable results.

5.3.1.1 Domestic Well Mitigation

In order to protect domestic water supplies in the region, the Wyandotte Creek GSA would conduct the following under this management action:

1. Establish a voluntary registry for domestic wells.
2. Compile domestic well logs, screen depths, and locations.
3. Improve and deepen domestic wells so that well screens are at or below the MTs established for the Wyandotte Creek Subbasin.

4. Provide emergency supplies, such as bottled drinking water or potable water for sanitation, to communities with dry domestic wells. Priority would be given to DACs who are dependent on groundwater.

Creating a registry of domestic wells in the region, with information on well location and screen depths, would help the GSA compile important data into a centralized location. This would allow the GSA to determine which wells need to be updated to the current standards and which may need to be deepened, as well as to help them prioritize certain communities for emergency response.

Development of the mitigation program started in 2023, and the program will be implemented if groundwater conditions decline below historical lows or as domestic wells are being significantly impacted by declining groundwater levels. Local agencies are actively working to connect vulnerable residents with domestic wells to public water supply systems, such as the Palermo Clean Water Consolidation Project.

5.3.2 Other Management Actions

Management Actions categorized as Other Management Actions may have benefits to groundwater conditions but are not part of the GSA's strategy to maintain/achieve sustainability.

5.3.2.1 General Plan Updates

Under this management action, the Wyandotte Creek GSA would monitor, participate, and coordinate with the City of Oroville and Butte County, who are currently updating their General Plans, to make necessary amendments so that the plans recognize important components of the Wyandotte Creek Subbasin's GSP.

5.3.2.2 Well Permitting Ordinance

According to current Butte County Code, wells are required to be screened below groundwater levels measured during the 1989 to 1994 drought. With water levels continuing to decline in the Wyandotte Creek Subbasin, several domestic wells are becoming dry. Wyandotte Creek GSA in coordination with Butte County is working to update the current well permitting ordinance to require all domestic wells in the Representative Monitoring Network area to be screened below the MT depths established for the Wyandotte Creek Subbasin.

5.3.2.3 Landscape Ordinance

Wyandotte Creek GSA will coordinate with Butte County and the City of Oroville to update the landscape ordinance to encourage new residential, commercial, and industrial developments to use drought-resistant species and to limit the size of grass turf lawns. This ordinance would also promote xeriscaping and focus efforts and funds on reducing landscape irrigation and water use for swimming pools. The implementation of this ordinance would require a period of planning, public discussion, and code enforcement for each new building permit.

5.3.2.4 Expansion of Water Purveyors' Service Area

Under this management action, water purveyors would expand their service areas and provide drinking water to residential areas that are currently using private domestic groundwater wells. Groundwater levels in the Wyandotte Creek Subbasin would be allowed to recover with the overall decrease in groundwater demand. This action would require approval from the Butte Local Agency Formation Commission and the California Public Utilities Commission.

5.4 Data Collection and Analysis

5.4.1 County Contour Mapping

As part of the efforts to collect the information necessary to fill the information needs and data gaps identified in Section 3, this project proposes to expand the existing monitoring program to include Butte, Glenn, Colusa, and Tehama counties and conduct these groundwater elevation surveys in the spring, summer, and fall. The monitoring program would gather data used to produce groundwater contours and estimates of lateral and vertical flow direction and volume. Producing this data for the four counties will help to identify interbasin flow patterns and influences on surface water flows and replenishment locations, thereby improving coordination between counties and water management decision-making.

Routine water table monitoring programs will track overall water table trends in the region and provide important, up-to-date data for making decisions on water management. Establishing these programs amongst the four counties will aid in the exchange of data and improve regional coordination on various water projects. The expanded water monitoring programs will be established by the Wyandotte Creek GSA, with assistance from the four counties.

5.4.2 Project: Update the Butte Basin Groundwater Model

The existing BBGM covers the Vina, Butte, and Wyandotte Creek Subbasins. This project will help fill the identified information needs and data gaps and will consist of 1) updating the BBGM with newly acquired data; and 2) using the updated version of the model to run simulations and better establish the basin's SMC as needed.

Some of the new data to be added is the AEM data and data on the different hydraulic conductivities of each layer of the aquifer. The AEM data will be used, among other things, to adjust the various surfaces in the model to better present the aquifer's hydrogeologic layers.

Once the model has been updated with the new data, it will be better suited for running simulations of different water or land management scenarios as well as predictions for climate and precipitation fluctuations. Lateral and vertical connectivity between aquifer layers and connections to surface water features will be more accurate and help identify areas of the basin where groundwater recharge may be needed. Overall, this will help shape management actions by focusing their efforts on those particular areas. Ongoing updates to the model will emphasize the importance of accurate and up-to-date data and help continue monitoring efforts such as measuring water levels and stream flows.

An updated groundwater model is vital for running accurate simulations that may be used to make important decisions regarding groundwater allocation, pumping, recharge, and other activities. The model should contain the most up-to-date data to represent the basin realistically and accurately. Two updates to the model are currently planned during SGMA implementation.

5.4.3 Community Monitoring Program

As discussed in Section 3.3, the MT for groundwater levels is based on the depths of domestic wells. The dataset used for this assessment is limited and likely includes wells no longer in use or poorly maintained. To resolve this data gap, the GSA will conduct surveys of domestic wells within the Wyandotte Creek Subbasin to assess if the wells are still active and well construction details. As domestic well construction information may be limited, selected wells may be video logged to obtain additional information.

The GSA will also maintain a record of verifiable domestic wells that go dry during the implementation period that will include depth of these wells, screen intervals, and available maintenance records. These data will be used to modify the MT over the implementation period, as appropriate. New groundwater level monitoring sites will be added to the community monitoring program pending stakeholder interest and funding.

5.4.4 Interconnected Surface Water/Associated Impacts on Groundwater Dependent Ecosystems

As presented Section 4.10, there is limited data to analyze interaction of streams and pumping within the primary aquifer system. Additional wells and other monitoring networks have been installed and may be expanded, as appropriate, and data is being collected at newly installed monitoring sites. The GSA may re-evaluate ISW/ GDE following the framework discussed in Section 3.8.

5.5 Adaptive Management Strategies

The Wyandotte Creek GSA will be requesting annual reports from the project proponents to evaluate progress on implementation. If the projects are not progressing or if monitoring efforts demonstrate that those projects are not achieving their targets, the GSA will evaluate the need for additional or modified projects and begin implementation of management actions.

5.6 Potential Available Funding Mechanisms

As listed above in the individual project descriptions, several funding mechanisms have been identified to help with the planning and implementation of the GSP projects. The following is an abbreviated list of some of the funding mechanisms proposed:

Project Type	Funding Type	Program	Dates
IRWM (projects included in an adopted IRWMP)	Implementation grant	TBD	Proposition 4 funds expected 2027
Recharge Projects	Planning, design, and construction grants	TBD	Proposition 4 funds expected 2027
Wastewater Treatment for URC Projects	Planning and construction grants	Small Community Grant Fund	Applications accepted continuously
Public Water Systems Improvement	Planning and construction grants	Drinking water grants	Applications accepted continuously
Land Conservation	USDA Farm Service Agency	Conservation Reserve Program	Applications accepted continuously

6. PLAN IMPLEMENTATION

The SGMA requires the GSA to partner with groundwater users to develop and implement GSPs to achieve groundwater sustainability. SGMA requires the Wyandotte Creek Subbasin to be sustainable by 2042. The GSP includes provisions to evaluate current conditions in the Wyandotte Creek Subbasin (Section 2), establish the SMC (Section 3), gather and analyze groundwater data (Section 4), and report findings. The provisions in the GSP will be evaluated every 5 years and updated as necessary. The Wyandotte Creek Subbasin GSA is required to submit the amended GSP to DWR by January 31, 20277. DWR will evaluate the GSP within 24 months of submittal. Upon submittal of this GSP to DWR, GSP implementation will begin in the Wyandotte Creek Subbasin. The GSA will continue their efforts with public engagement and to secure funding to monitor and manage groundwater resources. This section presents the manner in which the GSA will execute the GSP consistent with the requirements in CCR Title 23 § 354.6(e).

The GSP includes provisions for:

- Gathering data at RMS locations
- Evaluation of SMC
- Report of findings and analysis
- PMAs

Each of these will require funding and schedule coordination to help achieve Wyandotte Creek Subbasin sustainability goals. The following sections describe the funding mechanisms and timetable for the GSP implementation.

6.1 Estimate of Groundwater Sustainability Plan Implementation Costs

Where feasible, the GSA will use existing funding and/or programs for use in the GSP implementation. The GSA, member agencies, and water purveyors will coordinate to implement the actions outlined in this GSP. The GSA will fund the implementation of the GSP where other sources are not available. The cost of implementation of the GSP by activity is presented below.

6.1.1 Administrative Costs

These include the cost of annually operating the GSA, including staff expenses, audit, outreach, legal and other administrative costs. This does not include agency specific project implementation costs. Costs are estimated to be in the range of approximately $100,000 to $300,000 annually, as shown in Table 6-1.

Table 6-1: Estimated Administrative Costs

GSP Implementation	Estimated Annual Costs
Public Outreach	$15,000
Staff	$100,00
Legal	$20,000
Total Estimate	$135,000

6.1.2 Monitoring

Monitoring for compliance with SGMA regulations will include periodic (e.g., biannual / monthly) collection of groundwater levels RMS wells and annual collection of groundwater quality measurements. The GSA will maintain sites including all continuous measurement equipment at groundwater level sites and stream gages as conditions dictate and funding allows. The GSA will assess the value and need for added monitoring data annually and adjust their monitoring plan as needed. Monitoring activity costs will include labor (field data collection, surveying, laboratory analysis, data quality control / assurance, and project management) and equipment (vehicles, meters, pumps, field tools/supplies), as shown in Table 6-2.

Table 6-2: Monitoring Activities and Estimated Cost

Monitoring Activity	Frequency	Estimated Annual Cost
Groundwater Levels (minimum required)	Biannual, 2 events	$30,000
Groundwater Quality (minimum required)	Annual, 1 event	$6,000
Groundwater Levels & Stream Gages (as conditions dictate and funding allows)	Continuous sensors / telemetry	Up to $61,500

Some monitoring locations include wells that are monitored and funded under other existing programs.

6.1.3 Data Analysis

The data gathered from the monitoring will be analyzed to assess trends for determination of undesirable results. Analysis of the data may lead to modifications in the RMS network, the HCM, and the priority of PMAs. Data gaps that arise from analysis may require installation of new RMS locations. The estimated cost for data analysis activities is shown in Table 6-3.

Table 6-3: Data Analysis Activities and Estimated Cost

Data Analysis Activity	Frequency	Estimated Annual Cost
DMS	Annual	$5,000
Review of Groundwater Data	Annual	$5,000

6.1.4 Reporting and Evaluation

Annual reports are required after GSP adoption to provide updates to general GSP information, basin conditions, and plan implementation progress. Section 6.5 discusses the annual reporting plan in more detail. GSA are required to conduct an evaluation of the GSP and prepare a report every 5 years or whenever the GSP is amended. Section 6.6 discusses the evaluation report in more detail. The estimated cost for reporting and evaluation activities is shown in Table 6-4.

Table 6-4: Reporting and Evaluation Activities and Estimated Cost

Reporting Activity	Frequency	Estimated Cost
Annual Report	Annual	$30,000
5-year Evaluation Report	5 Years	$100,000

6.1.5 Data Collection

A discussion of the data needed to improve groundwater management and address data gaps is presented in Section 5 and the estimated costs are presented in Table 6-5 below.

Table 6-5: Estimated Costs for Implementing Data Improvements to Address Data Gaps

Data Collection	Estimated Costs
Contour Mapping	$15,000 - $40,000
Interconnected Surface Water/GDEs	$100,000 - $200,000
Butte Basin Model Update 1	$25,000 - $75,000
Butte Basin Model Update 2	$25,000 - $75.,000

6.1.6 Project and Management Actions

The PMAs and anticipated costs are presented in Section 5. The PMAs with a planned initiation date in or before 204242 are presented in Table 6-6 below.

Table 6-6: Estimated Project Costs

Project Name	Capital Costs	Expected Groundwater Demand Reduction (AFY)
TWSD Water Treatment Plant Capacity Upgrade	$1.5 -$3M	500+
Palermo Clean Water Improvement Project	$12.4M	500+
Flood MAR	TBD	500+
Intra-Basin Water Transfer	TBD	Up to 4,000
Agricultural Surface Water Supplies	TBD	Up to 4,000
Residential Water Conservation	TBD	100 - 200
Agricultural Irrigation Efficiency	TBD	TBD
Oroville Wildlife Area Robinson's Riffle Project	$1.7M	TBD
Streamflow Augmentation	TBD	1,000 – 5,000
Water Loss Monitoring	$800,000	TBD
Well Upgrades	TBD	TBD
Fuel Management for Watershed Health	TBD	TBD
Removal of Invasive Species	TBD	TBD

6.2 Identify Funding Alternatives

The GSA will seek to capitalize on existing funding and programs that overlap with GSP requirements. For example, Butte County, DWR and other entities currently fund groundwater data collection programs at locations within the Wyandotte Creek Subbasin. The GSA will ensure that the existing programs meet the technical requirements of the monitoring and reporting as outlined in the GSP.

In cases where no funding or programs are established, the GSA is responsible for securing funding for the GSP implementation. In 2023, the GSA successfully passed a Proposition 218 process to assess landowners based on three user classes: non-irrigated, irrigated with surface water, and irrigated with groundwater. These fees fund administrative, legal, and SGMA-compliance costs. The GSA will consider alternative funding structures based on feedback from constituent members as needed.

Funding is anticipated to be met from one or a combination of the following sources: direct contributions from the GSA constituent members, State and Federal grant funding, and taxes or assessments levied on landowners and groundwater users in accordance with local and State law.

The GSA successfully applied for funding through the DWR's Sustainable Groundwater Management (SGM) Grant Program to support ongoing operational costs and to fund agency operations. These costs include retaining consulting firms and legal counsel to provide oversight and assist with SGMA compliance. Expenses consist of administrative support, GSP development, and GSP implementation. The GSA will continue to apply for grant funding to support GSP implementation.

6.3 Schedule for Implementation

The monitoring, data analysis and reporting will begin upon submittal of the GSP by DWR. The PMAs listed in Table 6-66 are scheduled to be completed by 204242 or earlier. Each of the PMAs will be completed by priority as funding and resources become available. An implementation schedule is shown in Figure 6-1.

6.4 Data Management Systems

In development of this GSP, the GSA developed a groundwater model that was calibrated to estimate future scenarios. The DMS plans to build on existing data inputs in the groundwater model and develop a more formalized approach to collecting and capturing data. As stated in Section 4, Monitoring Network, future data will be gathered to develop annual reports as well as provide necessary information for future and ongoing update to the groundwater models at five-year intervals upon GSP implementation. The DMS that will be used is a geographical relational database that will include information on water levels, land elevation measurements, and water quality testing. The DMS will allow the GSA to store the necessary information for annual reporting.

The DMS will be on local servers and data will be transmitted annually to form a single repository for data analysis for the Wyandotte Creek Subbasin's groundwater, as well as to allow for preparation of annual reports. GSA representatives have access to data and will be able to ask for a copy of the regional DMS. The DMS currently includes the necessary elements required by the regulations, including:

- Well location and construction information for the representative monitoring points (where available)
- Water level readings and hydrographs including water year type
- Land based measurements
- Water quality testing results
- Estimate of groundwater storage change, including map and tables of estimation
- Graph with Water Year type, Groundwater Use, Annual Cumulative Storage Change

Reporting generated from data from the GSA will include but is not limited to:

- Seasonal groundwater elevation contours
- Estimated groundwater extraction by category
- Total water uses by source

Additional items may be added to the DMS in the future as required. Data will be entered into the DMS by each GSA. The majority of the data will then be aggregated to the entity that is responsible for the regional DMS and summarized for reporting to DWR. Groundwater contours will be prepared outside of the DMS because of the need to evaluate the integrity of the data collected and generate a static contour set that has been reviewed and will not change once approved. Groundwater storage calculations will be calculated in accordance with the method described in Section 2, outside of the DMS. Results are uploaded to the DMS for annual reporting and trend monitoring. Since most of the pumping in the Wyandotte Creek Subbasin is not currently measured, the groundwater pumping estimates are also calculated outside of the DMS using the methods developed by GSA and uploaded to the DMS for annual reporting and trend analysis. The GSA may choose to have their own separate system for additional analysis.

The one-time cost of expanding the existing data systems is estimated between $50,000 to $200,000 as the system is still being evaluated. The Board has indicated a desire to make the data transparent and available to the public while respecting the privacy of individual landowners.

6.5 Annual Reporting

Annual reports will be submitted by April 1 for the prior year's activities. The report will include a general update in the form of an executive summary with accompanying map of the Wyandotte Creek Subbasin. The body of the report will include a detailed discussion and graphical representation of the following:

- Groundwater elevation data, including contour maps at seasonal high and low conditions and hydrographs using water year type and historical data from at least 2015.
- Groundwater extraction data divided into volume by water usage sectors with accompanying map, including a description of the methodology and accuracy of the groundwater extraction estimation.
- Surface water volume used or available for use for groundwater recharge or water supply/conjunctive use, including a description of the water sources.

- Total water volume use divided into water use sector and water source type, including a description of the methodology and accuracy of the water use estimation.
- Changes in groundwater storage with accompanying map, including a graph with water year type, groundwater use, annual change in groundwater storage, and cumulative change in groundwater storage using historical data from at least 2015.

The annual report will also include a discussion and update on the plan implementation including the status of IM and the execution of PMAs.

6.6 Periodic Evaluation Report

The GSA will evaluate the GSP and provide a Periodic Evaluation report every 5 years or whenever the GSP is amended for submittal to DWR, as required by SGMA and in consideration of DWR guidance.

6.7 Inter-basin Coordination

Wyandotte Creek GSA intends to coordinate in the following ways with its neighboring subbasins and with subbasins in the Feather River Corridor (Wyandotte Creek, Butte, North Yuba, Sutter Subbasins):

1. Information Sharing

Wyandotte Creek Subbasin will work with GSA staff of Butte and North Yuba subbasins to identify lines of communication and methods for information sharing between subbasins and GSA Boards. This will continue throughout GSP implementation and may include:

1. Inform each other on changing conditions (i.e., surface water cutbacks, land use changes, policy changes that inform groundwater management)
2. Share annual reports and interim progress reports
3. Share data and technical information and work towards building shared data across and/or along basin boundaries (e.g., monitoring data, water budgets, modeling inputs and outputs, and GDEs)

2. Conduct Joint Analysis and Evaluation of GSPs

Wyandotte Creek Subbasin pursued grant funding and collaboratively worked with subbasins in the Feather River Corridor group to:

1. Contract with a consultant to conduct this work
2. Evaluate and compare contents of GSPs with a focus on establishing a common understanding of basin conditions at boundaries
3. Identify significant differences, uncertainties, and potential issues of concern related to groundwater interaction at the boundaries
4. Engage in analysis and evaluation of SMC between GSPs to assess impacts and identify significant differences and possible impacts between subbasins that could potentially lead to undesirable results

   This work was completed in 2026.

3. Coordinate on mutually beneficial activities

Wyandotte Creek GSA will work collaboratively with Feather River Corridor subbasins to identify items in our GSPs that are ripe for a coordinated project and pursuit of funding such as Projects and Management Actions, Data Gaps (new monitoring wells, stream gaging etc.)

1. Wyandotte Creek will pursue grant funding to support a consultant to conduct this work
2. Wyandotte Creek will work collaboratively with the Northern California Water Association (NCWA) and others in their efforts to pursue funding and support local and state agency activities to identify and fill regional data gaps

4. Coordinated Communication and Outreach

Wyandotte Creek GSA staff will continue to participate in regional public engagement activities and efforts related to implementation of SGMA in the Northern Sacramento Valley. This may include:

1. Coordinate and collaborate on regional-scale public engagement and communication strategies that promote awareness on groundwater sustainability, enhance public trust, and maintain institutional knowledge
2. Maintain list of GSP/subbasin staff contacts and websites

5. Issue Resolution Process

Wyandotte Creek Subbasin will pursue development of an issue-resolution process with neighboring subbasins in the Feather River Corridor group.

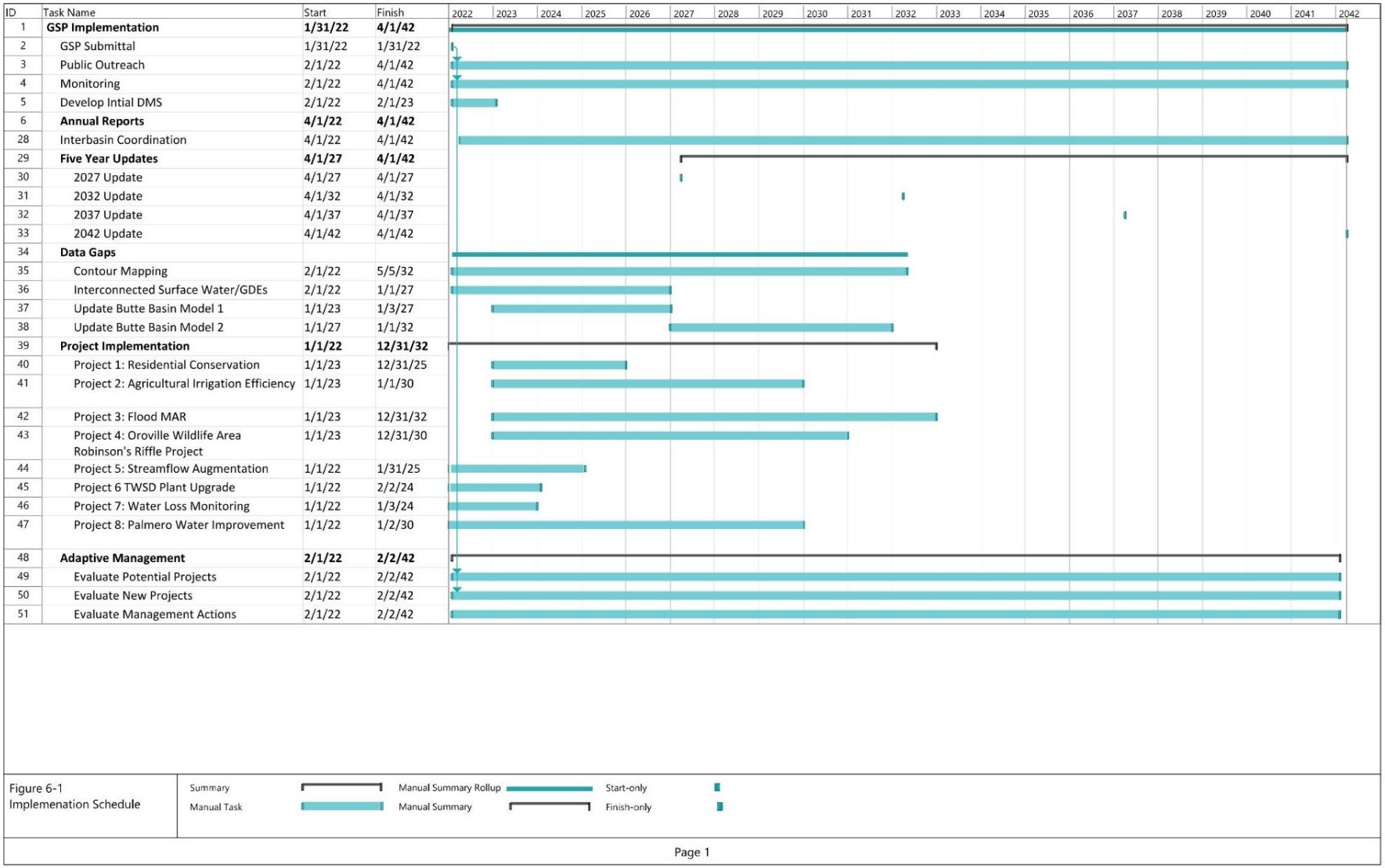


Figure 6-1: Implementation Schedule

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APPENDIX 1-A
Preparation Checklist for Groundwater Sustainability Plan Submittal

GSP Regulations Section	Water Code Section	Requirement	Description	Section(s) in the GSP
Article 3. Technical and Reporting Standards				
352.2		Monitoring Protocols	• Monitoring protocols adopted by the GSA for data collection and management • Monitoring protocols that are designed to detect changes in groundwater levels, groundwater quality, inelastic surface subsidence for basins for which subsidence has been identified as a potential problem, and flow and quality of surface water that directly affect groundwater levels or quality or are caused by groundwater extraction in the basin	4.7 4.7.1 4.7.2
Article 5. Plan Contents, Subarticle 1. Administrative Information				
354.4		General Information	• Executive Summary • List of references and technical studies	ES 7
354.6		Agency Information	• GSA mailing address • Organization and management structure • Contact information of Plan Manager • Legal authority of GSA • Estimate of implementation costs	1.1.3 1.1.4 1.1.4.1 1.1.4.2 6.1
354.8(a)	10727.2(a)(4)	Map(s)	• Area covered by GSP • Adjudicated areas, other agencies within the basin, and areas covered by an Alternative • Jurisdictional boundaries of federal or State land • Existing land use designations • Density of wells per square mile	1.1.4 1.2.1
354.8(b)		Description of the Plan Area	• Summary of jurisdictional areas and other features	1.2.1
354.8(c) 354.8(d) 354.8(e)	10727.2(g)	Water Resource Monitoring and Management Programs	• Description of water resources monitoring and management programs • Description of how the monitoring networks of those plans will be incorporated into the GSP • Description of how those plans may limit operational flexibility in the basin • Description of conjunctive use programs	1.3 1.4 1.3.5

GSP Regulations Section	Water Code Section	Requirement	Description	Section(s) in the GSP
354.8(f)	10727.2(g)	Land Use Elements or Topic Categories of Applicable General Plan	• Summary of general plans and other land use plans • Description of how implementation of the GSP may change water demands or affect achievement of sustainability and how the GSP addresses those effects • Description of how implementation of the GSP may affect the water supply assumptions of relevant land use plans • Summary of the process for permitting new or replacement wells in the basin • Information regarding the implementation of land use plans outside the basin that could affect the ability of the Agency to achieve sustainable groundwater management	1.3.1 1.3.2 1.3.3 1.3.4 1.3.5 1.3.6
354.8(g)	10727.4	Additional GSP Contents	**Description of Actions related to:** • Control of saline water intrusion • Wellhead protection • Migration of contaminated groundwater • Well abandonment and well destruction program • Replenishment of groundwater extractions • Conjunctive use and underground storage • Well construction policies • Addressing groundwater contamination cleanup, recharge, diversions to storage, conservation, water recycling, conveyance, and extraction projects • Efficient water management practices • Relationships with State and federal regulatory agencies • Review of land use plans and efforts to coordinate with land use planning agencies to assess activities that potentially create risks to groundwater quality or quantity • Impacts on groundwater dependent ecosystems	1.3 1.4 1.5 2.2.7
354.10		Notice and Communication	• Description of beneficial uses and users • List of public meetings • GSP comments and responses • Decision-making process • Public engagement • Encouraging active involvement	1.8.3 1.8.4 1.8.5 1.8.4.1 1.8.4.2 1.8.4.3

GSP Regulations Section	Water Code Section	Requirement	Description	Section(s) in the GSP
			• Informing the public on GSP implementation progress	1.8.5
Article 5. Plan Contents, Subarticle 2. Basin Setting				
354.14		Hydrogeologic Conceptual Model	• Description of the Hydrogeologic Conceptual Model • Two scaled cross-sections • Map(s) of physical characteristics: topographic information, surficial geology, soil characteristics, surface water bodies, source and point of delivery for imported water supplies	2.1 2.1.6 2.1.2.1 2.1.2.2 2.1.2.3 2.1.3
354.14(c)(4)	10727.2(a)(5)	Map of Recharge Areas	• Map delineating existing recharge areas that substantially contribute to the replenishment of the basin, potential recharge areas, and discharge areas	2.1.2.4
	10727.2(d)(4)	Recharge Areas	• Description of how recharge areas identified in the plan substantially contribute to the replenishment of the basin	2.1.2.4
354.16	10727.2(a)(1) 10727.2(a)(2)	Current and Historical Groundwater Conditions	• Groundwater elevation data • Estimate of groundwater storage • Seawater intrusion conditions • Groundwater quality issues • Land subsidence conditions • Identification of interconnected surface water systems • Identification of groundwater-dependent ecosystems	2.2.2.1 2.2.2.3 2.2.3 2.2.4 2.2.5 2.2.6 2.2.7
354.18	10727.2(a)(3)	Water Budget Information	• Description of inflows, outflows, and change in storage • Quantification of overdraft • Estimate of sustainable yield • Quantification of current, historical, and projected water budgets	2.3.4 2.3.6 2.3.4.1 2.3.4.2 2.3.4.3
	10727.2(d)(5)	Surface Water Supply	• Description of surface water supply used or available for use for groundwater recharge or in-lieu use	2.3.4

GSP Regulations Section	Water Code Section	Requirement	Description	Section(s) in the GSP
354.20		Management Areas	• Reason for creation of each management area • Minimum thresholds and measurable objectives for each management area • Level of monitoring and analysis • Explanation of how management of management areas will not cause undesirable results outside the management area • Description of management areas	1.2.2 3.2.2 3.2.3 3.3.2 3.3.3 3.4.2 3.4.3 3.5.2 3.5.3 3.7.1 3.7.2 3.8.4 3.8.5 4.8 4.9
Article 5. Plan Contents, Subarticle 3. Sustainable Management Criteria				
354.24		Sustainability Goal	• Description of the sustainability goal	3.1
354.26		Undesirable Results	• Description of undesirable results • Cause of groundwater conditions that would lead to undesirable results • Criteria used to define undesirable results for each sustainability indicator • Potential effects of undesirable results on beneficial uses and users of groundwater	3.3.1 3.4.1 3.5.1 3.7.1 3.8.3
354.28	10727.2(d)(1) 10727.2(d)(2)	Minimum Thresholds	• Description of each minimum threshold and how they were established for each sustainability indicator • Relationship for each sustainability indicator • Description of how selection of the minimum threshold may affect beneficial uses and users of groundwater • Standards related to sustainability indicators	3.2.1 3.2.2 3.3.2 3.4.2 3.5.2 3.7.1 3.8.4
			• How each minimum threshold will be quantitatively measured	4.7 4.8 4.9

GSP Regulations Section	Water Code Section	Requirement	Description	Section(s) in the GSP
354.30	10727.2(b)(1) 10727.2(b)(2) 10727.2(d)(1) 10727.2(d)(2)	Measurable Objectives	• Description of establishment of the measurable objectives for each sustainability indicator • Description of how a reasonable margin of safety was established for each measurable objective • Description of a reasonable path to achieve and maintain the sustainability goal, including a description of interim milestones	3.2.3 3.3.3 3.4.3 3.5.3 3.7.2 3.8.5
Article 5. Plan Contents, Subarticle 4. Monitoring Networks				
354.34	10727.2(d)(1) 10727.2(d)(2) 10727.2(e) 10727.2(f)	Monitoring Networks	• Description of monitoring network • Description of monitoring network objectives • Description of how the monitoring network is designed to: demonstrate groundwater occurrence, flow directions, and hydraulic gradients between principal aquifers and surface water features; estimate the change in annual groundwater in storage; monitor seawater intrusion; determine groundwater quality trends; identify the rate and extent of land subsidence; and calculate depletions of surface water caused by groundwater extractions • Description of how the monitoring network provides adequate coverage of Sustainability Indicators • Density of monitoring sites and frequency of measurements required to demonstrate short-term, seasonal, and long-term trends • Scientific rational (or reason) for site selection • Consistency with data and reporting standards • Corresponding sustainability indicator, minimum threshold, measurable objective, and interim milestone • Location and type of each monitoring site within the basin displayed on a map, and reported in tabular format, including information regarding the monitoring site type, frequency of measurement, and the purposes for which the monitoring site is being used • Description of technical standards, data collection methods, and other procedures or protocols to ensure comparable data and methodologies	4.1 4.2 4.3 4.4 4.5 4.6 4.7 4.8 4.9

GSP Regulations Section	Water Code Section	Requirement	Description	Section(s) in the GSP
354.36		Representative Monitoring	• Description of representative sites • Demonstration of adequacy of using groundwater elevations as proxy for other sustainability indicators • Adequate evidence demonstrating site reflects general conditions in the area	4.9
354.38		Assessment and Improvement of Monitoring Network	• Review and evaluation of the monitoring network • Identification and description of data gaps • Description of steps to fill data gaps • Description of monitoring frequency and density of sites	4.10
Article 5. Plan Contents, Subarticle 5. Projects and Management Actions				
354.44		Projects and Management Actions	• Description of projects and management actions that will help achieve the basin's sustainability goal • Measurable objective that is expected to benefit from each project and management action • Circumstances for implementation • Public noticing • Permitting and regulatory process • Time-table for initiation and completion, and the accrual of expected benefits • Expected benefits and how they will be evaluated • How the project or management action will be accomplished. If the projects or management actions rely on water from outside the jurisdiction of the Agency, an explanation of the source and reliability of that water shall be included. • Legal authority required • Estimated costs and plans to meet those costs • Management of groundwater extractions and recharge	5 6
354.44(b)(2)	10727.2(d)(3)		• Overdraft mitigation projects and management actions	5 5.3

GSP Regulations Section	Water Code Section	Requirement	Description	Section(s) in the GSP
Article 8. Interagency Agreements				
357.4	10727.6	Coordination Agreements – Shall be submitted to the Department together with the GSPs for the basin and, if approved, shall become part of the GSP for each participating Agency.	**Coordination Agreements shall describe the following:** • A point of contact • Responsibilities of each Agency • Procedures for the timely exchange of information between Agencies • Procedures for resolving conflicts between Agencies • How the Agencies have used the same data and methodologies to coordinate GSPs • How the GSPs implemented together satisfy the requirements of SGMA • Process for submitting all Plans, Plan amendments, supporting information, all monitoring data and other pertinent information, along with annual reports and periodic evaluations • A coordinated data management system for the basin • Coordination agreements shall identify adjudicated areas within the basin, and any local agencies that have adopted an Alternative that has been accepted by the Department	NA

Note:

(a) The California Water Code and regulation sections, GSP requirements, and requirement descriptions listed in this table were taken verbatim from the California Department of Water Resources Guidance Document for the Sustainable Management of Groundwater: Preparation Checklist for GSP Submittal (December 2016).

APPENDIX 1-B
Joint Powers Agreement and Notice of Agreement

AMENDMENT #1
THE WYANDOTTE CREEK GROUNDWATER SUSTAINABILITY AGENCY JOINT EXERCISE OF POWERS AGREEMENT

The JOINT EXERCISE OF POWERS AGREEMENT ("Agreement") establishing the Wyandotte Creek Groundwater Sustainability Agency is amended pursuant to Section 18.3 by replacing Article 7 with the following effective upon the date when the last Member Agency signs this Amendment (Effective Date").

ARTICLE 7. AGENCY DIRECTORS AND OFFICERS

7.1. Formation of the Board of Directors. The Agency shall be governed and administered by a Board of Directors ("Board of Directors" or "Board") which is hereby established and which shall be composed of one (1) voting seat per Member. The governing board shall be known as the "Board of Directors of the Wyandotte Creek Groundwater Sustainability Agency." All voting power shall reside in the Board. The Board shall consist of the following representatives, who shall be appointed in the manner set forth in Section 7:

7.1.1. One (1) representative appointed by each Member's governing body, who shall hold a current position in the Member's governing body and be referred to as a "Member Director."

7.1.2. Two (2) Stakeholder Directors, one of which shall be representative of agricultural stakeholders and interests within the Basin and one of which shall be representative of domestic well user stakeholders and interests within the Basin. The two (2) Stakeholder Directors shall meet the following qualifications:

(a) One (1) Agricultural Stakeholder Director. The Agricultural Stakeholder Director shall meet the following criteria, determined at the sole discretion of the Butte County Board of Supervisors: (1.a) own/ lease real property in active commercial agricultural production overlying the Basin or (1.b) be an employee of a commercial agricultural production operation overlying the Basin involved with water use decisions and (2) the commercial agricultural production operation employing any Stakeholder Director must extract groundwater from the Basin for irrigation/frost protection. The Agricultural Stakeholder may not be a party to any pending litigation against the Agency or any of its Members.

(b) One (1) Non-Agricultural Domestic Well User Stakeholder Director. The Domestic Well User Stakeholder Director shall meet the following criteria, determined at the sole discretion of the Butte County Board of Supervisors: (1.a) own/ lease real residential property that is the stakeholder's primary residence overlying the Basin (2) extract from the Basin for domestic water use. The Domestic Well User Stakeholder may not be a party to any pending litigation against the Agency or any of its Members.

7.2. Duties of the Board of Directors. The business and affairs of the Agency, and all of the powers of the Agency, including without limitation all powers set forth in Article 5, are reserved to and shall be exercised by and through the Board of Directors, except as may be expressly delegated to others pursuant to this Agreement, Bylaws, or by specific action of the Board of Directors.

7.3. Appointment of Directors. The Directors shall be appointed as follows:

7.3.1. Member Directors. Each Member Director must sit on the governing board of the Member agency and be appointed by that governing board by notification, which shall be transmitted to the Chair of the Agency following adoption by the Member.

7.3.2. Stakeholder Directors. The two (2) Stakeholder Directors shall be appointed as follows:

a) Agricultural Stakeholder Director. The Directors shall select the Agricultural Stakeholder Director from a list of qualified nominees submitted to Butte County pursuant to an open application process. The Butte County Board of Supervisors shall consider the nominees at a regular meeting and shall appoint the Agricultural Stakeholder Director.

(b) Domestic Well User Stakeholder Director. The Directors shall confirm the nomination for the Domestic Well User Stakeholder Director from a list of qualified nominees submitted to Butte County pursuant to an open application process specified in the Bylaws. The Butte County Board of Supervisors shall consider the nominees at a regular meeting and shall appoint the Domestic Well User Stakeholder Director .

7.4. Alternate Directors. Each Member shall also appoint one Alternate Director to the Board of Directors, and an Alternate Director shall be appointed for each Stakeholder Director. All Alternate Directors shall be appointed in the same manner as set forth in Section 7.3. Alternate Directors shall have no vote and shall not participate in any discussions or deliberations of the Board unless appearing as a substitute for a Director due to absence or conflict of interest. If the Director is not present, or if the Director has a conflict of interest which precludes participation by the Director in any decision-making process of the Board, the Alternate Director appointed to act in his/her place shall assume all rights of the Director and shall have the authority to act in his/her absence, including casting votes on matters before the Board. Each Alternate Director shall be appointed prior to the third meeting of the Board. Alternate Directors are encouraged to attend all Board meetings and stay informed on current issues before the Board.

7.5. Terms of Office. The term of office for each member of the Agency's Board of Directors is four (4) years and may be reappointed. Each Member Director and Alternate Member Director of the Board of Directors shall serve at the pleasure of the appointing Member's Governing Body and may be removed from the Board of Directors by the appointing Members Governing Body at any time. If at any time a vacancy occurs on the Board of Directors, a replacement shall be appointed to fill the unexpired term of the previous Board Member pursuant to this Article 7 and within ninety (90) days of the date that such position becomes vacant.

7.6. Removal of Board Members. A Board Member that no longer meets the qualifications set forth in section 7.1.1 is automatically removed from the Agency Board of Directors. Upon removal of a Director, the Alternate Director shall serve as a Director until a new Director is appointed. Members must submit any changes in Member Director or Alternate Member Director positions to the Chair in writing and signed by the Member. A Stakeholder

Director may be removed for failure to attend three (3) consecutive meeting or as a result of no longer meeting the qualifications set forth in Article 7 of this Agreement.

7.7. Vacancies. A vacancy on the Board of Directors shall occur when a Director resigns or reaches the end of that Director's term, as set forth in Section 7.5. For Member Directors, a vacancy shall also occur when he or she is removed by his or her appointing Member. For Stakeholder Directors, a vacancy shall also occur when the Stakeholder Director is removed, as set forth in Section 7.6. Upon the vacancy of a Director, the Alternate Director shall serve as Director until a new Director is appointed as set forth in Section 7.4 unless the Alternate Director is already serving as an Alternate Director in the event of a prior vacancy, in which case, the seat shall remain vacant until a replacement Director is appointed as set forth in Section 7.4. Members shall submit any changes in Director or Alternate Director positions to the Chair by written notice signed by an authorized representative of the Member's governing body.

IN WITNESS WHEREOF, the parties hereto, pursuant to resolutions duly and regularly adopted by their respective governing boards, have caused their names to be affixed by their proper and respective officers as of the date of execution of this Agreement.

County of Butte

By: _____ Date: 3/12/19

Steve Lambert, Chair

Board of Supervisors

City of Oroville

By: _____ Date: 4-2-19

Chuck Reynolds, Mayor

City Council

Thermalito Water and Sewer District

By: _____ Date: 03-18-2019

TREVOR HATLEY

~~Brian Pulley,~~ President

Board of Directors

JOINT EXERCISE OF POWERS AGREEMENT ESTABLISHING THE WYANDOTTE CREEK GROUNDWATER SUSTAINABILITY AGENCY

This JOINT EXERCISE OF POWERS AGREEMENT ("Agreement") establishing the Wyandotte Creek Groundwater Sustainability Agency is made and entered into and effective upon the date when the last Member Agency signs this Agreement ("Effective Date") by and among the public agencies listed on the attached Exhibit A (Members) for the purpose of forming a Groundwater Sustainability Agency ("GSA") and achieving groundwater sustainability in the Wyandotte Creek Groundwater Subbasin ("Basin").

Recitals

WHEREAS, in the fall of 2014, the California legislature adopted, and the Governor signed into law, three bills (SB 1168, AB 1739, and SB 1319) collectively referred to as the "Sustainable Groundwater Management Act" ("SGMA"), that initially became effective on January 1, 2015, and that has been amended from time-to-time thereafter; and

WHEREAS, the stated purpose of SGMA, as set forth in California Water Code section 10720.1, is to provide for the sustainable management of groundwater basins at a local level by providing local groundwater agencies with the authority, and technical and financial assistance necessary, to sustainably manage groundwater; and

WHEREAS, SGMA requires the designation of Groundwater Sustainability Agencies ("GSAs") for the purpose of achieving groundwater sustainability through the adoption and implementation of Groundwater Sustainability Plans ("GSPs") or an alternative plan for all medium and high priority basins as designated by the California Department of Water Resources ("DWR"); and

WHEREAS, Pursuant to Article 6.1 and 6.2 of this agreement, each Member is a local agency, as defined by SGMA (Division 2, Part 2.74 (commencing with §10720), Part 5 (commencing with §4999), Part 5.1 (commencing with §5100) and Part 5.2 (commencing with §5200) of the California Water Code Section *et seq.*; "SGMA"), duly organized and existing under and by virtue of the laws of the State of California, and each Member has water supply, water management or land use responsibilities within the Wyandotte Creek Subbasin, which is designated basin number 5-021.69 in the DWR Bulletin Number 118 (update 2016); and

WHEREAS, Section 10720.7 of SGMA requires all basins designated as high or medium priority basins by the Department of Water Resources ("DWR") in its Bulletin 118 be managed under groundwater sustainability plans or coordinated groundwater sustainability plans pursuant to SGMA; and

WHEREAS, The Members have determined that the sustainable management of the Basin pursuant to SGMA may best be achieved through the cooperation of the Members operating through a joint powers agency; and

WHEREAS, in order to promote efficiency and sharing of resources, the Members, individually and collectively, encourage coordination; and

WHEREAS, the Joint Exercise of Powers Act (Chapter 5 (commencing with Section 6500) of Division 7 of Title 1 of the California Government Code; the "Act"), authorizes two or more public agencies to, by agreement, jointly exercise any power held in common by agencies entering into such an agreement and to exercise additional powers granted under the Act; and

WHEREAS, based on the foregoing legal authority, the Members desire to create a joint powers agency for the purpose of taking all actions deemed necessary by the joint powers agency to ensure sustainable management of the Basin as required by SGMA; and

WHEREAS, the governing board of each Member has determined it to be in the Member's best interest and in the public interest that this Agreement be executed;

NOW THEREFORE, in consideration of the matters recited and the mutual promises, covenant, and conditions set forth in this Agreement, the Members hereby agree as follows:

TERMS OF AGREEMENT

ARTICLE 1. DEFINITIONS

As used in this Agreement, unless context requires otherwise, the meanings of the terms set forth below shall be as follows:

1.1. "Act" means the Joint Exercise of Powers Act, set forth in Chapter 5 of Division 7 of Title 1 of the Government Code, sections 6500, *et seq.*, including all laws supplemental thereto.

1.2. "Agency" means the Wyandotte Creek Groundwater Sustainability Agency.

1.3. "Agreement" means this joint powers agreement, which creates the Wyandotte Creek Groundwater Sustainability Agency.

1.4. "Basin" means the Wyandotte Creek Subbasin, as shown on the map attached to this Agreement as Exhibit B, which is incorporated herein by this reference, as attached hereto and incorporated herein by this reference.

1.5. "Board of Directors" or "Board" means the governing body of the Agency as established by Article 7 of this Agreement.

1.6. "Board Member" or "Director" shall mean a member of the Agency's Board of Directors.

1.7. "Committee" shall mean any committee established pursuant to Article 11 of this Agreement.

1.8. "Effective Date" means the date on which the last Member executes this Agreement.

1.9. "Fiscal Year" means July 1 through June 30.

1.10. "GSA" shall mean a groundwater sustainability agency.

1.11. "GSP" shall mean a groundwater sustainability plan.

1.12. "Management Area" refers to an area within a basin for which a GSP may identify different minimum thresholds, measurable objectives, monitoring, and projects and actions based on unique local conditions. The GSP must describe each Management Area, including rationale for approach and demonstrate it can be managed without causing undesirable results out of the Area.

1.13. "Member" has the meaning assigned to it in the Preamble and further means each party to this Agreement that satisfies the requirements of section 6.1 of this Agreement, including any new members as may be authorized by the Board pursuant to Section 6.2 of this Agreement.

1.14. "Member Director" means a director or alternate director appointed by a Member pursuant to Article 7 of this Agreement.

1.15. "Member's Governing Body" means the board of directors or other voting body that controls the individual public agencies that are Members.

1.16. "SGMA" has the meaning assigned to it in the first Recital of the Agreement.

1.17. "Special Project" means a project undertaken by some, but not all Members of the Agency, pursuant to Article 14 of this Agreement.

1.18. "Stakeholder Director" means a Director appointed pursuant to Article 7 that represents stakeholder interests.

1.19. "State" means the State of California.

1.20. "DWR" means the California Department of Water Resources.

ARTICLE 2. THE AGENCY

2.1. Upon the effective date of this Agreement, Wyandotte Creek Groundwater Sustainability Agency ("Agency") is hereby created. Pursuant to the provisions of the Act, the Agency shall be a public agency separate from its Members.

2.2. The boundaries of the Agency shall be as shown on the map on Exhibit B, which is attached to this Agreement and incorporated herein by this reference. The boundary will reflect the most recent Bulletin 118 boundaries as they become available.

ARTICLE 3. PURPOSE OF THE AGENCY

3.1. The purpose of this Agreement is to create a joint powers agency (Agency) separate from its Members that elects to be the GSA for the entire Basin. The purpose of the Agency is to (a) develop, adopt, and implement a GSP for the Basin in order to implement

SGMA requirements and achieve the sustainability goals outlined in SGMA; and (b) involve the public and area stakeholders through outreach and engagement in developing and implementing the Wyandotte Creek Subbasin GSP.

ARTICLE 4. TERM

4.1. This Agreement shall become effective upon execution by each of the Parties and shall continue in full force and effect until terminated pursuant to the provisions of Article 17.

4.2. By execution hereof, each Member certifies and declares that it is a legal entity that is authorized to be a party to a joint exercise of powers agreement and to contract with each other for the joint exercise of a common power under Article 1, Chapter 5, Division 7, Title 1 of the Government Code, commencing with section 6500 or other applicable law including but not limited to California Water Code § 10720.3(c).

ARTICLE 5. POWERS OF THE AGENCY

5.1 Powers. The Agency shall possess the ability to exercise those powers specifically granted by the Act and SGMA. Additionally, the Agency shall possess the ability to exercise the common powers of its Members related to the purposes of the Agency, including, but not limited to, the following:

5.1.1 To designate itself as the exclusive GSA for the Basin pursuant to SGMA.

5.1.2 To develop, adopt and implement a GSP for the Basin pursuant to SGMA.

5.1.3 To adopt rules, regulations, policies, bylaws and procedures governing the operation of the Agency and adoption and implementation of a GSP for the Basin.

5.1.4 To adopt ordinances within the Basin consistent with the purpose of the Agency as necessary to implement the GSP and otherwise meeting the requirements of the SGMA.

5.1.6 To obtain legal, financial, accounting, technical, engineering, and other services needed to carry out the purposes of this Agreement.

5.1.7 To perform periodic reviews of the GSP including submittal of annual reports.

5.1.8 To require the registration and monitoring of wells within the Basin.

5.1.9 To issue revenue bonds or other appropriate public or private debt and incur debts, liabilities or obligations.

5.1.10 To exercise the powers permitted under Government Code section 6504 or any successor statute.

5.1.11 To levy taxes, assessments, charges and fees as provided in SGMA or otherwise provided by law.

5.1.12 To regulate and monitor groundwater extractions within the Basin as permitted by SGMA, provided that this Agreement does not extend to a Member's operation of its systems to distribute water once extracted or otherwise obtained, unless and to the extent required by other laws now in existence or as may otherwise be adopted.

5.1.13 To establish and administer projects and programs for the benefit of the Basin.

5.1.14 To cooperate, act in conjunction and contract with the United States, the State of California, or any agency thereof, counties, municipalities, special districts, GSAs, public and private corporations of any kind (including without limitation, PUC regulated utilities and mutual water companies), and individuals, or any of them, for any and all purposes necessary or convenient for the full exercise of powers of the Agency.

5.1.15 To accumulate operating and reserve funds and invest the same as allowed by law for the purposes of the Agency and to invest funds pursuant to California Government Code section 6509.5 or other applicable State Law.

5.1.16 To apply for and accept grants, contributions, donations and loans under any federal, state or local programs for assistance in development or implementing any of its projects or programs for the purposes of the Agency.

5.1.17 To acquire by negotiation, lease, purchase, construct, hold, manage, maintain, operate and dispose of any buildings, property, water rights, works or improvements within and without the respective boundaries of the Members necessary to accomplish the purposes described herein.

5.1.18 To sue and be sued in the Agency's own name.

5.1.19 To exercise the common powers of its Members to develop, collect, provide and disseminate information that furthers the purposes of the Agency, including but not limited to the operation of the Agency and adoption and implementation of a Groundwater Sustainability Plan for the Basin, to the Members' legislative, administrative, and judicial bodies, as well as the public generally.

5.1.20 To perform all other acts necessary or proper to carry out fully the purposes of this Agreement.

5.2 Preservation of Powers. The Agency and all of its Members confirm that nothing contained herein shall grant the Agency any power to:

5.2.1 Alter any water right, contract right, or any similar right held by its Members, or amend a Member's water delivery practice, course of dealing, or conduct without the express consent of the holder thereof.

5.2.2 Limit or interfere with the respective Members' rights and authorities over their own internal matters, including, but not limited to, a GSA's legal rights to surface water supplies and assets, groundwater supplies and assets, facilities, operations, water management and water supply matters.

5.2.3 Modify or limit a Member's police powers, land use authorities, well permitting or any other authority.

5.3 Coordination between Basins. In order to maintain consistency and the efficient use of resources, to the extent feasible, the Agency shall strive to coordinate between and among the other adjoining subbasins for administration, matters involving public communication and outreach, and for developing frameworks to support groundwater management, which may include agreement to certain areas of coordination, provided that the Agency retain its own authority and that such recommendations are ratified by the Board. The Agency may clarify and acknowledge coordination among the other GSAs through a document or agreement if deemed appropriate.

ARTICLE 6. MEMBERSHIP

6.1. Initial Members. The initial Members of the Agency shall be the County of Butte, City of Oroville, and Thermalito Water and Sewer District.

6.2. New Members. Additional Parties may join the Agency and become a Member provided that the prospective new member: (a) is eligible to join a GSA as provided by SGMA (Water Code §10723), (b) possesses powers common to all other Members, (c) pays all previously incurred costs, if any, (e) pays all applicable fees and charges, if any, and (f) receives unanimous consent of the existing Members, evidenced by the execution of a written amendment to this Agreement signed by all Members, including the additional public agency.

ARTICLE 7. AGENCY DIRECTORS AND OFFICERS

7.1. Formation of the Board of Directors. The Agency shall be governed and administered by a Board of Directors ("Board of Directors" or "Board") which is hereby established and which shall be composed of one (1) voting seat per Member. The governing board shall be known as the "Board of Directors of the Wyandotte Creek Groundwater Sustainability Agency." All voting power shall reside in the Board. The Board shall consist of the following representatives, who shall be appointed in the manner set forth in Section 7:

7.1.1. One (1) representative appointed by each Member's governing body, who shall hold a current position in the Member's governing body and be referred to as a "Member Director."

7.1.2. Two (2) Stakeholder Directors, one of which shall be representative of agricultural stakeholders and interests within the Basin and one of which shall be representative of domestic well user stakeholders and interests within the Basin. The two (2) Stakeholder Directors shall meet the following qualifications:

(a) One (1) Agricultural Stakeholder Director. The Agricultural Stakeholder Director shall meet the following criteria, determined at the sole discretion of the Board Members: (1.a) own/ lease real property in active commercial agricultural production overlying the Basin or (1.b) be an employee of a commercial agricultural production operation overlying the Basin involved with water use decisions and (2) the commercial agricultural production operation employing any Stakeholder Director must extract groundwater from the Basin for irrigation/frost protection. The Agricultural Stakeholder may not be a party to any pending litigation against the Agency or any of its Members.

(b) One (1) Non-Agricultural Domestic Well User Stakeholder Director. The Domestic Well User Stakeholder Director shall meet the following criteria, determined at the sole discretion of the Board Members: (1.a) own/ lease real residential property that is the stakeholder's primary residence overlying the Basin (2) extract from the Basin for domestic water use. The Domestic Well User Stakeholder may not be a party to any pending litigation against the Agency or any of its Members.

7.2. Duties of the Board of Directors. The business and affairs of the Agency, and all of the powers of the Agency, including without limitation all powers set forth in Article 5, are reserved to and shall be exercised by and through the Board of Directors, except as may be expressly delegated to others pursuant to this Agreement, Bylaws, or by specific action of the Board of Directors.

7.3. Appointment of Directors. The Directors shall be appointed as follows:

7.3.1. Member Directors. Each Member Director must sit on the governing board of the Member agency and be appointed by that governing board by notification, which shall be transmitted to the Chair of the Agency following adoption by the Member.

7.3.2. Stakeholder Directors. The two (2) Stakeholder Directors shall be appointed as follows:

(a) Agricultural Stakeholder Director. The Directors shall select the Agricultural Stakeholder Director from a list of qualified nominees submitted to the Directors pursuant to an open application process specified in the Bylaws. The Directors shall consider the nominees at a regular meeting and shall appoint the Agricultural Stakeholder Director upon unanimous vote of all Directors.

(b) Domestic Well User Stakeholder Director. The Directors shall confirm the nomination for the Domestic Well User Stakeholder Director from a list of qualified nominees submitted to the Directors pursuant to an open application process specified in the Bylaws. The Directors shall consider the nominees at a regular meeting and shall appoint the Domestic Well User Stakeholder Director upon unanimous vote of all Directors.

7.4. Alternate Directors. Each Member shall also appoint one Alternate Director to the Board of Directors, and an Alternate Director shall be appointed for each Stakeholder Director. All Alternate Directors shall be appointed in the same manner as set forth in Section 7.3. Alternate Directors shall have no vote and shall not participate in any discussions or deliberations of the Board unless appearing as a substitute for a Director due to absence or conflict of interest. If the Director is not present, or if the Director has a conflict of interest which precludes participation by the Director in any decision-making process of the Board, the Alternate Director appointed to act in his/her place shall assume all rights of the Director and shall have the authority to act in his/her absence, including casting votes on matters before the Board. Each Alternate Director shall be appointed prior to the third meeting of the Board. Alternate Directors are encouraged to attend all Board meetings and stay informed on current issues before the Board.

7.5. Terms of Office. The term of office for each member of the Agency's Board of Directors is four (4) years and may be reappointed. Each Member Director and Alternate Member Director of the Board of Directors shall serve at the pleasure of the appointing Member's Governing Body and may be removed from the Board of Directors by the appointing Members Governing Body at any time. If at any time a vacancy occurs on the Board of Directors, a replacement shall be appointed to fill the unexpired term of the previous Board Member pursuant to this Article 7 and within ninety (90) days of the date that such position becomes vacant.

7.6. Removal of Board Members. A Board Member that no longer meets the qualifications set forth in section 7.1.1 is automatically removed from the Agency Board of Directors. Upon removal of a Director, the Alternate Director shall serve as a Director until a new Director is appointed. Members must submit any changes in Member Director or Alternate Member Director positions to the Chair in writing and signed by the Member. A Stakeholder Director may be removed for failure to attend three (3) consecutive meeting or as a result of no longer meeting the qualifications set forth in Article 7 of this Agreement.

7.7. Vacancies. A vacancy on the Board of Directors shall occur when a Director resigns or reaches the end of that Director's term, as set forth in Section 7.5. For Member Directors, a vacancy shall also occur when he or she is removed by his or her appointing Member. For Stakeholder Directors, a vacancy shall also occur when the Stakeholder Director is removed, as set forth in Section 7.6. Upon the vacancy of a Director, the Alternate Director shall serve as Director until a new Director is appointed as set forth in Section 7.4 unless the Alternate Director is already serving as an Alternate Director in the event of a prior vacancy, in which case, the seat shall remain vacant until a replacement Director is appointed as set forth in Section 7.4. Members shall submit any changes in Director or Alternate Director positions to the Chair by written notice signed by an authorized representative of the Member's governing body.

ARTICLE 8. AGENCY MEETINGS

8.1. Initial Meeting. The initial meeting of the Agency's Board of Directors shall be called by the County of Butte and held in the Board of Supervisor Chambers 25 County Center Drive, Oroville CA 95965, within 60 days of the effective date of this Agreement.

8.2. Time and Place. The Board of Directors shall provide in its adopted bylaws or by other means authorized or required by law for the time and place for holding regular meetings, at least annually, and at such other times as determined by the Board of Directors.

8.3. Conduct. All meetings of the Board shall be noticed, held, and conducted in accordance with the Ralph. M. Brown Act to the extent applicable. Board Members and Alternate Board Members may use teleconferencing in connection with any meeting in conformance with and to the extent authorized by the applicable laws.

ARTICLE 9. BOARD OF DIRECTORS VOTING

9.1. Quorum. A majority of the members of the Board of Directors shall constitute a quorum for purposes of transacting business.

9.2. Director Votes. Each member of the Board of Directors of the Agency shall have one (1) vote. With the exception of items in section 9.3 below, an affirmative vote by a majority of all Board Members is required to approve any item. The Board of Directors shall strive for consensus of all members on items.

9.3. Supermajority Voting Requirement. A supermajority vote requires an affirmative vote of four (4) or more Directors. Items that require a supermajority vote to pass consist of the following, which may be amended from time to time by the Board by a supermajority, or as may otherwise be required by this Agreement or by law:

1. Bylaws adoption, modification or alteration
2. GSP adoption, modification or alteration
3. Adoption of assessment, charges and fees
4. Adoption of regulations and ordinances
5. Adoption or modification of annual budget, including capital projects
6. Property acquisition (excepting rights of way)
7. Appointment of Treasurer, Administrator, Plan Manager or General Counsel subject to the provisions in Article 12.
8. Modifications to the composition, selection, and number or removal of Advisory Committee Members
9. Approval and/or amendments to the Advisory Committee Charter
10. Removal of Stakeholder Directors
11. Acceptance of Management Area chapters submitted by Member(s)
12. Establishment of new or modification to existing Management Areas
13. Development of the Management Area chapter and associated cost allocations to Members within such Management Area in the event of a failure by a Member(s) to develop a Management Area chapter for their respective portion of the subbasin.

ARTICLE 10. OFFICERS

10.1. Officers. The Board of Directors shall select a Chair and Vice-Chair and any other officers as determined necessary by the Board of Directors.

10.1.1. The Chair shall preside at all Board Meetings.

10.1.2. The Vice-Chair shall act in place of the Chair at meetings should the Chair be absent.

10.1.3. All Officers shall be chosen at the first Board of Directors meeting and serve a term for one (1) year. An Officer may serve for multiple consecutive terms. Any Officer may resign at any time upon written notice to the Agency.

ARTICLE 11. COMMITTEE FORMATION

11.1 Management Committee. There shall be established by the Board of Directors a committee comprised of at least one (1) staff representative from each Member. The Management Committee shall exist for the term specified in the action establishing the committee, shall meet as directed by the Board of Directors, and shall recommend agenda items, administer the Stakeholder Advisory Committee, establish and administer technical working groups, and bring staff reports to the Board of Directors.

11.2 Internal Committee Formation. There shall be established such internal committees as the Board of Directors shall determine from time to time. Each such internal committee shall be comprised of two (2) Directors, shall exist for the term specified in the action establishing the committee, shall meet as directed by the Board of Directors, and shall make recommendations to the Board of Directors on the various activities of the Agency.

11.3. Stakeholder Advisory Committee Formation. The Board of Directors shall establish an advisory committee comprised of diverse social, cultural, and economic elements of the population and area stakeholders within the Basin. The Board of Directors shall encourage the active involvement of the advisory committee(s) prior to and during the development and implementation of the GSP. The Stakeholder Advisory Committee is subject to the Ralph M. Brown Act. At-large members are appointed by the Wyandotte Creek GSA Board of Directors. The Stakeholder Advisory Committee will initially include:

1. South Feather Water and Power (1)
2. California Water Service-Oroville (1)
3. Tribal representative(s)
4. At-large agricultural water users (3)
5. At-large domestic well users (2)
6. At-large environmental representative (1)
7. At-large business association representative (1)

The Board of Directors may appoint other Interests of Beneficial Uses and Users of Groundwater (Water Code §10723.3) to the Stakeholder Advisory Committee.

The Board of Directors will ensure that at least one (1) member from the Management Committee administers advisory committee(s). The advisory committee shall meet as directed by the Board of Directors and as specified in Exhibit C, and shall make recommendations to the Board of Directors as requested.

11.4. Technical Working Groups. There may be established by the Management Committee technical working groups from time to time, the purpose of which shall be to provide advice to the Management Committee on issues of a technical nature related to the activities of the Agency. The Board of Directors will ensure that at least one (1) member from the Management Committee administers technical working groups.

ARTICLE 12. OPERATIONS AND MANAGEMENT

12.1 Administrator and Plan Manager

12.1.1 Administrator: The Board may appoint an Administrator, from time-to-time and when it deems appropriate. If appointed, the Administrator shall serve at the pleasure of the Board of Directors and his/her duties and responsibilities shall be set forth by the Board in their bylaws or actions.

12.1.2 Plan Manager: The Board shall appoint a Plan Manager. The Administrator and Plan Manager may be the same individual. The Plan Manager shall serve at the pleasure of the Board of Directors and his/her duties and responsibilities shall be set forth by the Board.

12. 2 Treasurer and Controller. The County of Butte shall act as treasurer and controller for the Agency. The controller of the Agency shall cause an independent audit of the Agency's finances to be made by a certified public accountant in compliance with California Government Code section 6505. The treasurer of the Agency shall be the depositor and shall have custody of all money of the Agency from whatever source. The controller of the Agency shall draw warrants and pay demands against the Agency when the demands have been approved by the Agency or any authorized representative pursuant to any delegation of Agency adopted by the Agency. The treasurer and controller shall comply strictly with the provisions of statutes relating to their duties found in Chapter 5 (commencing with section 6500) of Division 7 of Title 1 of the California Government Code.

12.2. Legal Counsel and Other Officers. The Board of Directors may appoint legal counsel who shall serve at the pleasure of the Board. Subject to the limits of the Agency's approved budget, the Board shall also have the power to appoint and contract for the services of other officers, consultants, advisers and independent contractors as it may deem necessary or convenient for the business of the Agency, all of whom shall serve at the pleasure of the Board. The appointed General Legal Counsel and other appointed officers of the Agency shall not be employees or contractors of one or more of the Members. Appointment of a General Legal Counsel shall be subject to all applicable Rules of Professional Responsibility, and notwithstanding anything to the contrary in this Agreement, each of the Members expressly reserve and do not waive their rights to approve or disapprove of potential conflicts of Agency General Legal Counsel.

12.3 Employees and Management. The Agency will not have any employees. In lieu of hiring employees, the Agency may engage one or more Members to manage any of the business of the Agency on terms and conditions acceptable to the Board of Directors. Any Member so engaged shall have such responsibilities as set forth in an agreement for such Member's services, which shall be approved by a super-majority vote of the Directors. The Agency shall have the power to employ competent registered civil engineers and other consultants to investigate and to

carefully devise a plan or plans to carry out and fulfill the objects and purposes of SGMA, and complete a GSP.

12.4 Principal Office. At the initial meeting of the Board, the Board shall establish a principal office for the Agency, which shall be located at a place overlying the Basin. The Board may change the principal office from time to time so long as that principal office remains at a location overlying the Basin.

12.5 Bylaws. The Board shall adopt Bylaws governing the conduct of the meetings and the day-to-day operations of the Agency within six months of the Effective Date of this Agreement.

12.6 Official Seal and Letterhead. The Board may adopt, and/or amend, an official seal and letterhead for the Agency.

12.7 Conflict of Interest Code. The Board shall adopt and file a Conflict of Interest Code pursuant to the provisions of the Political Reform Act of 1974 within six months of the Effective Date. The Board may review and revise the Conflict of Interest Code from time to time as appropriate or when required by law.

ARTICLE 13. MANAGEMENT AREAS

13.1 Formation of Management Areas. As is consistent with state regulations, there will be two Management Areas in the Wyandotte Creek subbasin. One Management Area will encompass the municipal areas within and directly adjacent to the City of Oroville. The other Management Area will be in the rural area of the Wyandotte Creek subbasin. The final boundaries of the Management Areas shall be determined by the Agency in consultation with the Wyandotte Creek Advisory Committee.

13.2 Management Areas Chapters. The Management Areas would have distinct "chapters" in the GSP establishing different minimum thresholds, measurable objectives, monitoring and projects. All chapters must be consistent with the subbasin-wide sustainability goals. Management Areas refer to an area within a basin for which a GSP may identify minimum thresholds, measurable objectives, monitoring, and projects and actions based on unique local conditions.

13.3 Role of Agency. Subject to the Reservation of Authority set forth in Section 13.5, the Agency will serve a coordination and administrative role in the development of the Management Area chapter conducted by the lead Member agencies. The Agency will be responsible for accepting the Management Area chapters determined by the Agency to be compliant with SGMA and applicable regulations for inclusion into the GSP. Upon inclusion of Management Area chapters into the GSP, the Agency will be responsible for implementation and enforcement pursuant to Article 5.

13.4 Management Area Lead Responsibility. The City of Oroville, Butte County, and Thermalito Water and Sewer District will be responsible for overseeing the development of the Management Area chapter for the municipal portion of the subbasin. Butte County will be responsible for overseeing the development of the Management Area chapter for the rural portion of the subbasin.

13.5 Reservation of Authority. In the event of a failure by a Member to develop a Management Area chapter for their respective portion of the basin, the Agency reserves and retains all requisite authority to (1) develop the Management Area chapter and (2) allocate the cost of development of the Management Area chapter to Members within such Management Area.

13.6 Additional Management Areas. Additional Management Areas may be defined and established by the Board of Directors as set forth in 9.3.

ARTICLE 14. SPECIFIC PROJECTS

14.1. Projects. The Agency intends to carry out activities in furtherance of its purposes and consistent with the powers established by the Agreement with the participation of all Members.

14.2. Member Specific Projects. In addition to the general activities undertaken by all Members of the Agency, the Agency may initiate specific projects that involves less than all Members. No Member shall be required to be involved in a Project that involves less than all the Members.

14.3. Project Agreement. Prior to undertaking any project that does not involve all Member Agencies, the Members electing to participate in the Project shall enter into a Project Agreement. A Member may elect not to participate in a specific project matter by providing notice and not entering into the Project Agreement specific to the matter in which the Member has elected not to participate. Each Project Agreement shall provide the terms and conditions by which the Members that enter into the Project Agreement will participate in the Project. All assets, rights, benefits, and obligations attributable to the Project shall be assets, rights, benefits, and obligations of those Members which have entered into the Project Agreement. Any debts, liabilities, obligations, or indebtedness incurred by the Agency in regard to a particular Project shall be the debts, liabilities, obligations, and indebtedness of those Members who have executed the Project Agreement in accordance with the terms thereof and shall not be the debts, liabilities, obligations, and indebtedness of those Members who have not executed the Project Agreement.

14.4. Board of Directors Approval. The Board of Directors shall have the authority to disapprove any Project Agreement upon a determination that the Project Agreement has specific, substantial adverse impacts upon Members that have not executed the Project Agreement.

ARTICLE 15. FINANCIAL PROVISIONS

15.1. Agency Funding and Contributions. In order to provide the needed capital to initially fund the Agency, the Agency shall be initially funded through a GSP grant awarded by the Department of Water Resources and through in-kind contributions of Members. In subsequent years and as needed, the Agency may be funded through additional voluntary contributions by Members and as otherwise provided in Chapter 8 of SGMA (commencing with section 10730 of the Water Code).

15.2. Budgets. Within ninety (90) days after the first meeting of the Board of the Agency, and thereafter prior to the commencement of each fiscal year, the Board of Directors shall adopt a budget for the Agency for the ensuing fiscal year.

15.3. Long-Term Funding. Upon formation of the Agency, the Board of Directors shall work on the development, adoption and implementation of a long-term funding plan to cover the operating and administrative expenses of the Agency.

ARTICLE 16. LIABILITY AND INDEMNIFICATION

16.1. Liability. The Members do not intend hereby to be obligated either jointly or severally for the debts, liabilities or obligations of the Agency, except as may be specifically provided for in California Government Code section 895.2, as amended or supplemented. Therefore, unless and to the extent otherwise required by law or agreed to herein by the Members, in accordance with California Government Code section 6507 the debts, liabilities and obligations of the Agency shall not be the debts, liabilities or obligations of the Member entities. The Agency shall own and hold title to all funds, property and works acquired by it during the term of this Agreement.

16.2. Indemnification. Funds of the Agency may be used to defend, indemnify, and hold harmless the Agency, each Member, each Director, and any officers, agents and employees of the Agency for their actions taken within the course and scope of their duties while acting on behalf of the Agency. Other than for gross negligence or intentional acts, to the fullest extent permitted by law, the Agency agrees to save, indemnify, defend and hold harmless each Member from any liability, claims, suits, actions, arbitration proceedings, administrative proceedings, regulatory proceedings, losses, expenses or costs of any kind, whether actual, alleged or threatened, including attorney's fees and costs, court costs, interest, defense costs, and expert witness fees, where the same arise out of, or are in any way attributable in whole or in part to, negligent acts or omissions of the Agency or its employees, officers or agents or the employees, officers or agents of any Member, while acting within the course and scope of a Member relationship with the Agency.

ARTICLE 17. WITHDRAWAL AND TERMINATION

17.1. Withdrawal. A Member may unilaterally withdraw from this Agreement without causing or requiring termination of this Agreement, effective upon sixty (60) days written notice to the remaining Members.

17.2. Termination of Agency. This Agreement may be rescinded and the Agency terminated by unanimous written consent of all Members, except during the outstanding term of any Agency indebtedness.

17.3. Effect of Withdrawal or Termination. The JPA may be terminated and the Agency dissolved by a unanimous vote of the Member Directors. Upon termination of this Agreement or unilateral withdrawal, a Member shall remain obligated to pay its share of all debts, liabilities and obligations of the Agency required of the Member pursuant to the terms of this Agreement which were incurred or accrued prior to the date of such termination or withdrawal, including without limitation, those debts, liabilities and obligations pursuant to

Section 5. Any Member that withdraws from the Agency shall have no right to participate in the business and affairs of the Agency or to exercise any rights of a Member under this Agreement or the Act, but shall continue to share in distributions from the Agency on the same basis as if such Member had not withdrawn, provided that a Member that has withdrawn from the Agency shall not receive distributions in excess of the contributions made to the Agency while a Member. The right to share in distributions granted under this section shall be in lieu of any right the withdrawn Member may have to receive a distribution or payment of the fair value of the Member's interest in the Agency.

A Member may, in its sole discretion, withdraw from the Agency, effective 60 days after written notice to the Agency. Upon withdrawal or termination of the Agency, the withdrawing Member(s) retain all rights and powers to become or otherwise participate as a GSA for lands within its jurisdiction. In such an event, the Agency and its remaining Members will not object to or interfere with the lands in the withdrawing Member's boundaries; will facilitate such a transition to the extent necessary; and will withdraw from management that portion of the subbasin and so notify DWR.

17.4. Disposition of Agency Assets upon Termination.

17.4.1. Surplus Funds. Upon termination of this Agreement, any reserves or surplus money on-hand shall be returned to the Members in the same proportion said Members have funded such reserves or surplus, in accordance with California Government Code section 6512.

17.4.2. Agency Property. The Agency shall first offer any assets of the Agency for sale to the Members on terms and conditions determined by the Board of Directors. If no such sale to Members is consummated, the Board shall offer the assets of the Agency for sale to any non-member for good and adequate consideration on terms and conditions determined by the Board of Directors.

ARTICLE 18. MISCELLANEOUS

18.1. No Predetermination or Irretrievable Commitment of Resources. Nothing in this Agreement shall constitute a determination by the Agency or any of its Members that any action shall be undertaken or that any unconditional or irretrievable commitment of resources shall be made, until such time as the required compliance with all local, state, or federal laws, including without limitation the California Environmental Quality Act, National Environmental Policy Act, or permit requirements, as applicable, has been completed.

18.2. Notices. Notices hereunder shall be sufficient if delivered via electronic mail, First-Class mail or facsimile transmission to the addresses below:

County of Butte: Department of Water and Resource Conservation, 308 Nelson Ave, Oroville, CA 95965

City of Oroville: 1735 Montgomery Street, Oroville, CA 95965

Thermalito Water and Sewer District: 410 Grand Avenue, Oroville, CA 95965

18.3. Amendment. This Agreement may be amended at any time, by unanimous agreement of the Members, provided that before any amendments shall be operative or valid, it shall be reduced to writing and signed by all Members hereto.

18.4. Agreement Complete. This Agreement constitutes the full and complete agreement of the Members. This Agreement supersedes all prior agreements and understandings, whether in writing or oral, related to the subject matter of this Agreement that are not set forth in writing herein.

18.5. Severability. If any provision of this Agreement is determined to be invalid or unenforceable, the remaining provisions will remain in force and unaffected to the fullest extent permitted by law and regulation.

18.6. Execution in Counterparts. The Parties intend to execute this Agreement in counterparts. It is the intent of the Parties to hold one (1) counterpart with single original signatures to evidence the Agreement and to thereafter forward four (4) other original counterparts on a rotating basis for all signatures. Thereafter, each Member shall be delivered an originally executed counterpart with all Member signatures.

18.7. Withdrawal by Operation of Law. Should the participation of any Member to this Agreement be decided by the courts to be illegal or in excess of that Member's authority or in conflict with any law, the validity of this Agreement as to the remaining Members shall not be affected thereby.

18.8. Assignment. The rights and duties of the Members may not be assigned or delegated without the written consent of all other Members. Any attempt to assign or delegate such rights or duties in contravention of this Agreement shall be null and void.

18.9. Binding on Successors. This Agreement shall inure to the benefit of, and be binding upon, the successors or assigns of the Members.

18.10. Other JPAs. Nothing in this Agreement shall prevent the Members from entering into other joint exercise of power agreements.

18.11. Venue. This Agreement shall be governed by and construed in accordance with the laws of the State of California, and any action related to the terms of this Agreement shall be brought and tried in Butte County Superior Court.

IN WITNESS WHEREOF, the parties hereto, pursuant to resolutions duly and regularly adopted by their respective governing boards, have caused their names to be affixed by their proper and respective officers as of the date of execution of this Agreement.

County of Butte

By: _____ Date: 9-11-18

Steve Lambert, Chair

Board of Supervisors

City of Oroville

By: _____ Date: 9-18-18

Linda Dahlmeier, Mayor

City Council

Thermalito Water and Sewer District

By: _____ Date: 9-18-18

Brian Pulley, President

Board of Directors

Exhibit A: List of Member Agencies

Exhibit B: Wyandotte Creek Subbasin Map

Exhibit C: Draft Wyandotte Creek Advisory Committee Charter

EXHIBIT A
LIST OF MEMBER AGENCIES

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

City of Oroville
1735 Montgomery Street
Oroville, CA 95965

Thermalito Water and Sewer District
410 Grand Avenue
Oroville, CA 95965

Exhibit B
Wyandotte Creek Subbasin Map

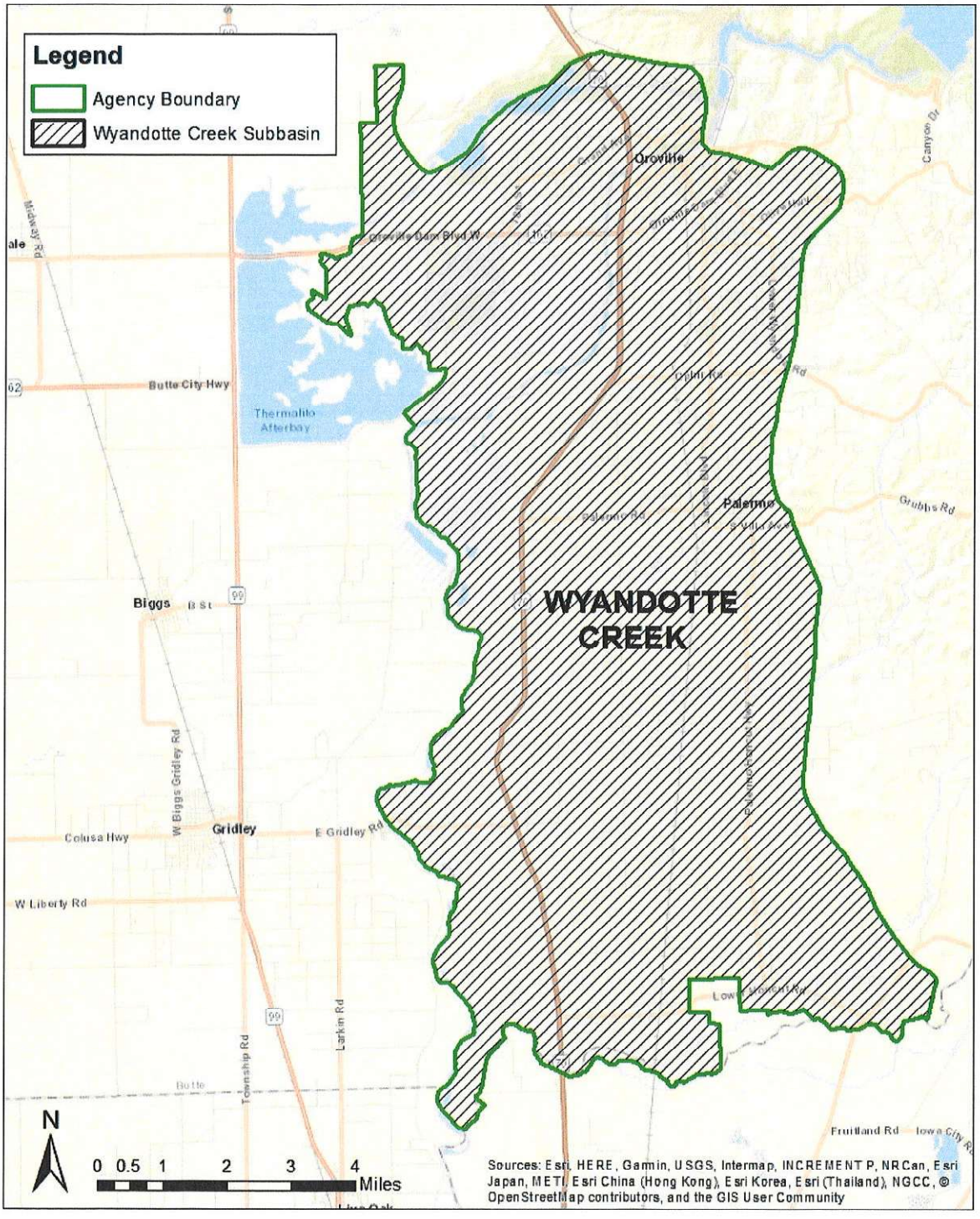


Exhibit C
Wyandotte Creek Groundwater Sustainability Agency
DRAFT Advisory Committee Charter
Version: August 18, 2018

I. Purpose

The purpose of the Wyandotte Creek Advisory Committee (AC) is to provide input and recommendations to the Groundwater Sustainability Agency (Agency) Board of Directors on groundwater sustainability plan (GSP) development and implementation. The intent of the AC is to provide community perspective and participation in Sustainable Groundwater Management Act (SGMA) implementation.

The AC will review and/or provide recommendations to the Agency Board on groundwater-related issues that may include:

1. Development, adoption, amendment of the GSP
2. Sustainability goals and objectives
3. Best management practices
4. Monitoring programs
5. Annual work plans and reports (including mandatory 5-year milestone reports)
6. Modeling scenarios
7. Inter-basin coordination activities
8. Projects and management actions to achieve sustainability
9. Community outreach
10. Local regulations to implement SGMA
11. Fee proposals
12. Other

The AC will not be involved in the Agency's day to day operations, such as contracting, budgeting, etc.

II. Brown Act, Open Process, and Conflicts of Interest

All meetings of the AC are open to the public. The Agency will announce AC meetings through its regular communication channels.

AC meetings are subject to the Brown Act. The AC shall adopt a schedule and location for regular meetings, and meeting agendas shall be posted in accordance with the Brown Act.

All AC meetings shall provide for public comment in accordance with the Brown Act, including non-agenda public comment and public comment on individual agenda items. As needed, time limits may be placed on public comments to ensure the AC is reasonably able to address all agenda items during the course of the meeting. Speakers will generally be limited to three minutes, but time may be adjusted based upon meeting circumstances. Special and emergency

meetings need not provide for non-agenda public comment, but such comment may be allowed in the AC's discretion. Members of the AC are subject to all applicable conflict of interest laws including Government Code section 1090 and the California Political Reform Act. The Agency shall adopt a conflict of interest code for the AC.

III. Roles and Responsibilities

Agency Board of Directors

The Agency Board commits to the value of the AC and will consider AC recommendations when making decisions.

Advisory Committee

The role and responsibility of the AC is to solicit and incorporate community and stakeholder interests into recommendations on SGMA implementation in the Wyandotte Creek subbasin for the Board to consider in its decision-making processes.

Criteria for Advisory Committee Membership

AC Members must:

1. Serve as a strong, effective advocate for the interest group represented
2. Work collaboratively with others
3. Commit time needed for ongoing discussions
4. Collectively reflect diversity of interests within the stakeholder group they represent
5. Complete any required Brown Act trainings by all applicable deadlines

As part of membership, members agree to:

1. Arrive at each meeting fully prepared to discuss the issues on the agenda. Preparation may include reviewing meeting summaries, technical information, and draft documents distributed in advance of each meeting
2. Present their constituent members' views on the issues being discussed and be willing to engage in respectful, constructive dialogue with other members of the group
3. Develop a problem-solving approach in which they consider the interests and viewpoints of all group members, in addition to their own
4. Keep their constituencies informed about the deliberations and actively seek their constituents' input

Management Committee

The Management Committee comprised of staff from each Member of the Agency are responsible for administering the AC which includes:

1. Maintaining a current roster of AC members
2. Working with Agency Board to fill AC vacancies, as needed
3. Preparing agendas for AC meetings
4. Noticing all meetings in accordance with the Brown Act

5. Staffing all meetings, recording minutes and developing and distributing meeting summaries
6. Working with AC and the Agency Board to develop annual work plans and schedules for AC meetings
7. Facilitating the process of incorporating AC recommendations in staff reports into Board packets
8. Ensuring that the records for AC member Brown Act Training are filed and updated as required
9. Maintaining a record of all meeting materials

Facilitator

As resources allow, a third-party facilitator may provide impartial facilitation services for AC meetings. The facilitator's primary responsibility is to ensure an open process where all AC member interests are heard and thoughtfully considered. To this end, the facilitator works on behalf of the process and the members contributing to AC efforts. Specific facilitator responsibilities include:

1. Supporting the Management Committee in developing and distributing Committee agendas and relevant materials
2. Advocating for a fair, effective, and credible process, but remain impartial with respect to the outcome of the deliberations
3. Applying collaborative, mutual-gain negotiation methods that foster openness and identify areas of preliminary and final consensus agreement for advice and recommendations to the Board
4. In the absence of consensus, helping to identify areas of agreement and disagreement
5. Checking in with members as needed to ensure all issues are identified and explored
6. Coordinating with Management Committee members to ensure accurate, impartial documentation of meetings and agreements (i.e. meeting summaries and recommendation reports)
7. Ensuring all members uphold the tenets of the charter

IV. Membership

Composition of the AC is intended to represent the beneficial uses and users of groundwater identified in SGMA. AC members only fill one seat on the AC and may not serve concurrently on the Agency Board or on the Management Committee. Members must live or work within the Wyandotte Creek subbasin or represent an organization with a presence in the Wyandotte Creek subbasin.

The Agency Board will appoint representatives to the AC. The following represents a draft, proposed list of possible AC representation:

1. Cal Water - Oroville (1)
2. South Feather Water and Power (1)

3. Tribal representative(s)
4. Agricultural groundwater users:
   a. Two (2) at-large members
   b. One (1) Groundwater Pumpers Advisory Committee (GPAC) member. In the event that the GPAC dissolves, this position will transition to an at-large position
5. At-large domestic well users (2)
6. At-large environmental representative (1)
7. At-large business association representative (1)

The Agency Board may appoint other interests representing beneficial users and uses of groundwater as per Water Code Section 10723.3).

Member Appointment

The Agency Board will appoint at-large members to fill AC seats. Interested individuals from the community or organizations may apply to the Agency Board, specifying in the application the seat(s) that the applicant intends to be considered for.

The Agency Board encourages candidates with experience and familiarity with groundwater and its groundwater management. The Agency Board will also give preference to applicants who have the backing of multiple organizations or individuals, have experience working with diverse community-based groups and can represent the interests of disadvantaged populations or interests that are otherwise under-represented on the Advisory Committee.

Application Timeline

Following Agency formation, the Agency Board will establish a timeline and process for appointment of the initial AC using the application process for the at-large seats on the AC and appointing the non-at-large seats as presented by the respective governing bodies of those non-at-large seats. In subsequent years, at-large applicants will submit applications for vacant at-large seats when they become vacant. The Agency will post blank applications on its website.

Advisory Committee Member Terms

The initial AC appointments will include approximately half of the seats with three-year terms ending in December 2022 and the remaining seats with two-year terms ending in December 2021. Following initial Committee appointment, all terms will be two years in length, ending in December. Appointees are not term-limited; however, at-large members would be required to apply for open seats each term. If a vacancy occurs for a seat before the end of the term, the Board will appoint a new individual to complete the term (using the application process for the at-large seats).

The Agency Board can remove an AC member if the member fails to attend three consecutive meetings or if the AC member no longer meets the criteria for AC membership. If deemed necessary by the Board, alternates may be appointed by the Agency Board.

V. Decision Making and Recommendations to the Agency Board

To inform Agency Board decision-making, the AC will provide written recommendations to the Agency included in Management Committee reports.

Any AC member(s) who disagree with a recommendation made by the AC to the Agency should provide an alternative that attempts to meet the interests they are representing as well as the interests of other members. The Committee will strive for consensus; however if unanimous agreement among all participants cannot be reached after all interests and options have been thoroughly identified, explored, and discussed, the AC shall not limit itself to strict consensus. When unable to reach consensus on advice or recommendations, the AC will outline the areas of disagreement and provide an explanation about such disagreements to inform the Agency Board for decision-making processes.

Pursuant to Agency Board direction, the Management Committee will develop an annual work plan(s) and schedule(s) for AC meetings. The AC will adopt a charter describing the purpose, operating principles and ground rules of the AC. This charter will be subject to approval by the Agency Board of Directors.

The Agency Board will consider AC recommendations when making decisions. If the Agency Board does not agree with the recommendations of the AC, the Agency Board shall state the reasons for its decision.

In order to conduct business (e.g. make and advance a recommendation to the Board), a quorum of the AC seated must be present. A simple majority of AC members constitutes a quorum.

VI. Process Agreements and Ground Rules

To conduct a successful collaborative process, all AC members will work together to create a constructive, problem solving environment. To this end, all members agree to the following process agreements which the AC will use, and to ground rules which will guide individual and group behavior.

Process Agreements

1. Everyone agrees to negotiate in good faith. All participants agree to participate in decision making, to act in good faith in all aspects of this effort and to communicate their interests during meetings. Good faith also requires that members not make commitments they do not intend to follow through with, and that members act consistently in the meetings and in other forums where the issues under discussion in these meetings are also being discussed.

2. Everyone agrees to address the issues and concerns of the participants. Everyone who is joining in the AC is doing so because s/he has a stake in the issue at hand. For the process to be successful, all the members agree to validate the issues and concerns of the other members and strive to reach an agreement that takes all the issues under consideration. Disagreements should be viewed as problems to be solved, rather than battles to be won.

3. Everyone agrees to inform and seek input from their constituents about the outcome of the facilitated discussions. To the extent possible, scheduling will allow for members to inform and seek input from their constituents, and others about discussions.

4. Everyone agrees that members can meet with other organizational or interest group members. AC members may find it helpful to meet with other organizations or interest group members and to consult with constituents outside of the meeting so the member is better able to communicate community concerns on the issues at hand.

5. Everyone agrees to attend all of the meetings to the extent possible. Continuity of the conversations and building trust are critical to the success of the AC.

Management Committee member(s)and / or the facilitator will coordinate the AC meeting schedule.

Ground Rules

1. Use Common Conversational Courtesy: Treat each other with mutual respect as you discuss and deliberate groundwater issues. Members are encouraged to turn off cell phones and focus on the issue at hand.
2. All Ideas and Points of View Have Value: The goal is to achieve understanding. Simply listen, you do not have to agree. If you hear something you do not agree with or you think is "silly" or "wrong," please remember that the purpose of the forum is to share ideas.
3. Be Honest, Fair, and as Candid as Possible: Put your interests forward, help others understand you and listen actively in order to understand others.
4. Avoid Editorials: It will be tempting to analyze the motives of others or offer editorial comments. Please talk about your own ideas and thoughts. Avoid commenting on why you believe another participant thinks something.
5. Honor Time, Be Concise and Share the Air: Help ensure an inclusive discussion by being cognizant of time constraints, stating your views clearly and concisely, and sharing the air so others can participate as well.
6. Think Innovatively and Welcome New Ideas: Creative thinking and problem solving are essential to success. "Climb out of the box" and attempt to think about the problem in a new way.
7. Invite Humor and Good Will: Don't hesitate to bring levity and humor to the process when warranted.

VII. Amendments

The AC can recommend future changes to the charter. The Agency Board may amend the charter when needed using its decision-making procedure.

Wyandotte Creek
GROUNDWATER SUSTAINABILITY AGENCY

308 Nelson Ave, Oroville, California • (530) 552-3591 • WyandotteGSA@gmail.com

CITY OF OROVILLE • THERMALITO WATER AND SEWER DISTRICT • COUNTY OF BUTTE

June 28, 2021

Paula Daneluk, Director
Butte County Department of Development Services
7 County Center Drive
Oroville, CA 95965

Re: Wyandotte Creek Groundwater Sustainability Plan

Director Daneluk:

Under the Sustainable Groundwater Management Act (SGMA), Groundwater Sustainability Agencies (GSA) must submit a Groundwater Sustainability Plan (Plan) that will assure groundwater is sustainable within 20 years. In Butte County, the Wyandotte Creek subbasin is required to have a Plan submitted by January 31, 2022. The Wyandotte Creek GSA is in the process of developing the Plan for the Wyandotte Creek subbasin in compliance with SGMA. SGMA requires that the GSAs provide at least a 90 day notice to cities and counties prior to adoption of a Plan. Through this letter, we are providing notice of the Plan development and seek your review of the draft Plan. (Water Code §10728.2)

SGMA recognizes the linkage between land use and groundwater management. Many of the projects and actions include recommendations for changes to land use, general plans, zoning and ordinances under your jurisdiction. The Plan takes into account projected growth from existing general plans. In the future, anytime a city or county readopts or substantially amends their general plan the planning agency shall review and consider an adoption of, or update to, a groundwater sustainability plan. (Under Government Code § 65350.5) We look forward to collaborating with you on groundwater sustainability in the Wyandotte Creek subbasin.

Various chapters of the Wyandotte Creek subbasin Plan are in draft form. The entire Wyandotte Creek subbasin Plan is expected to be released for a 60 day comment period in September, with a hearing to be held in November. Adoption of the Plan is expected in December. When the entire draft Plan is prepared in September, we will provide you with a notice of its availability. In the meantime, draft chapters are available for review at www.wyandottecreekgsa.com.

If you have any questions or would like more information please contact me.

Thank you.

Paul Gosselin, Administrator

Cc: Andy Pickett, Butte County CAO

Wyandotte Creek
GROUNDWATER SUSTAINABILITY AGENCY

308 Nelson Ave, Oroville, California • (530) 552-3591 • WyandotteGSA@gmail.com

CITY OF OROVILLE • THERMALITO WATER AND SEWER DISTRICT • COUNTY OF BUTTE

June 28, 2021

Bill LaGrone, City Administrator
Oroville City Hall
1735 Montgomery Street
Oroville, CA 95973

Re: Wyandotte Creek Groundwater Sustainability Plan

Mr. LaGrone:

Under the Sustainable Groundwater Management Act (SGMA), Groundwater Sustainability Agencies (GSA) must submit a Groundwater Sustainability Plan (Plan) that will assure groundwater is sustainable within 20 years. In Butte County, the Wyandotte Creek subbasin is required to have a Plan submitted by January 31, 2022. The Wyandotte Creek GSA is in the process of developing the Plan for the Wyandotte Creek subbasin in compliance with SGMA. SGMA requires that the GSAs provide at least a 90 day notice to cities and counties prior to adoption of a Plan. Through this letter, we are providing notice of the Plan development and seek your review of the draft Plan. (Water Code §10728.2)

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If you have any questions or would like more information please contact me.

Thank you.

Paul Gosselin, Administrator

APPENDIX 1-C
Groundwater Status Report for the 2025 Water Year

2026

Groundwater Status Report 2025 Water Year

PREPARED BY

BUTTE COUNTY DEPARTMENT OF WATER AND RESOURCE CONSERVATION

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Attachment A – Links to the Butte, Vina and Wyandotte Creek Subbasins Annual Reports

Acronyms and Definitions

2025 WY - 2025 water year means the 2025 hydrological year spanning from October 1, 2024 – September 30, 2025 designated by the calendar year in which it ends.

Department - Butte County Department of Water and Resource Conservation means the Butte County department formed on July 1, 1999 with the mission to manage and conserve water and other resources for the citizens of Butte County.

DWR - California Department of Water Resources means the state agency established in 1956 by the California State Legislature to protect, conserve, develop and manage much of California's water supply.

GSA - Groundwater Sustainability Agency means one or more local agencies with water supply, water management, or land use responsibilities within a groundwater basin that implements the provisions of the Sustainable Groundwater Management Act.

GSP - Groundwater Sustainability Plan means a plan of a GSA adopted pursuant to the Sustainable Groundwater Management Act.

MO - Measurable Objective refers to specific, quantifiable goals for the maintenance or improvement of specified groundwater conditions that have been included in an adopted GSP to achieve the sustainability goal for the basin.

Margin of Operational Flexibility – refers to the range of active management between the Minimum Threshold and the MO.

MT - Minimum Threshold refers to a numeric value for each sustainability indicator used to define undesirable results. For groundwater levels, a minimum threshold is caused by levels dropping below the threshold. However, for groundwater quality, it is a highest allowable value, rather than lowest.

Periodic Evaluation – means the Groundwater Sustainability Agencies' periodic evaluations of their Groundwater Sustainability Plans that are required by the California Department of Water Resources at least every five years to assess plan performance, progress toward sustainability goals, and implementation of projects.

PMA - Projects and Management Action means projects and management actions developed by the GSAs and identified in the GSPs, that when implemented would help to achieve the sustainability goal for the basin, including projects and management actions to respond to changing conditions in the basin.

Report - Butte County Groundwater Status Report refers to this annual report on groundwater conditions which meets Butte County Chapter 33 reporting requirements.

RMS wells - Representative monitoring site wells means wells intended to be representative of general conditions within the area allowing for a focused and specific monitoring location to effectively represent a larger geographical area.

Salinity - is a measure of the amount of salts in the water. Salts and other substances affect the quality of water used for irrigation and drinking as well as have an influence on aquatic species and habitat.

SC - Specific conductivity means a measure of the ability of the material to conduct an electrical current and is used to measure salinity in groundwater quality monitoring.

SGMA - Sustainable Groundwater Management Act means a package of bills collectively signed into law September 16, 2014, requiring local sustainable management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results and providing the state with broad oversight authority and the ability to intervene.

TAF - Thousand Acre-feet refers to a volume of water in thousands of acre-feet.

Butte County Groundwater Status Report

1. Executive Summary

The 2025 Water Year (2025 WY) spanning from October 1, 2024 to September 30, 2025 brought average hydrologic conditions to Butte County, marking the third consecutive year of improved water supply following the 2020-2022 drought. **All three groundwater Subbasins within the County, Butte, Vina, and Wyandotte Creek, experienced stable or improving groundwater levels, supported by average precipitation, full local surface water allocations, and typical groundwater pumping volumes for the conditions.**

In the 2025 WY, groundwater conditions continued to improve in this third year of above-normal water year conditions. **Groundwater levels rose in most monitoring wells since the previous water year, with average increases of approximately one to three feet across Subbasins and seasons.** Table 1 shows the one-year changes in groundwater levels and those across recent three-year wet and dry periods per Subbasin. In the 2025 WY groundwater levels also rose about 14 and seven feet above the Groundwater Sustainability Plans' (GSPs) measurable objectives on average at the Representative Monitoring Site wells (RMS) in the spring and fall, respectively. All measured groundwater levels remained within operational thresholds across all Subbasins. Groundwater storage also improved in two Subbasins, with notable gains of 44 thousand acre-feet (TAF) in the Vina Subbasin and 19 TAF in the Wyandotte Creek Subbasin while there were slight decreases of about 11 TAF in the Butte Subbasin, likely due to the timing and intensity of the precipitation in the area. Long-term trends starting from the year 2000 through 2025, indicate a downward trend in groundwater levels in the Vina Subbasin, underscoring the need for continued collaboration with each Groundwater Sustainability Agency (GSA) to implement groundwater management projects that focus on: 1) demand reduction and water conservation, 2) Recharge 3) an increased use of surface water supplies, and 4) expanded planning and policy development. **Water Year 2025 marked the second consecutive year in which no domestic well owners reported dry or reduced-capacity household wells to the California Department of Water Resources (DWR) Dry Well Reporting System.**

Table 1. Average seasonal groundwater-level changes over a 1-year period and over 3-year periods during recent drought and wet conditions in the Butte, Vina, and Wyandotte Creek Subbasins.

Subbasin	Average Spring Groundwater Level Change: 2024 to 2025 (feet):	Average Fall Groundwater Level Change: 2024 to 2025 (feet)	Average Spring Groundwater Level Decline during Drought period: 2019-2022 (feet)	Average Spring Groundwater Level Increase during Wet period: 2022-2025 (feet)
Butte	1	0	-7	6
Vina	3	3	-13	10
Wyandotte Creek	3	-1	-6	7

To pursue and maintain sustainable conditions, Butte County, local agencies, and GSA partners continued implementation of priority projects, expansion and enhancement of groundwater monitoring networks, and drought resilience efforts. State grant funding and local cost-share initiatives further supported these efforts. The Department remains committed to providing its GSA partners technical assistance through ongoing monitoring of groundwater conditions, tracking key indicators, implementing projects and management actions (PMAs) in partnership with other agencies, providing technical staff support, and collaborating with local and state partners to maintain or achieve long-term groundwater sustainability by 2042.

Butte Subbasin

In the Butte Subbasin, groundwater conditions were relatively stable during the 2025 water year. Over both seasons, groundwater levels in the RMS wells showed a slight increase on average from WY 2024; however, there was a slight overall decrease in groundwater storage of about 11 TAF from the previous year, likely due to the timing and intensity of the precipitation in the area. Groundwater levels and the corresponding changes in groundwater storage Subbasin-wide continue to be stable and generally fluctuate in response to water year type and surface water availability. The cumulative change in groundwater storage since 2000, a decrease of about 19 TAF is about 1 TAF of decline per year since 2000. In consideration of estimate uncertainty, this is a small and relatively nominal change in groundwater storage. The Subbasin is not considered to be in a state of overdraft.

In the Butte Subbasin, groundwater levels are generally stable and shallow, supported by substantial and reliable surface water supplies and recharge, resulting from surface water applied throughout the Subbasin (thereby reducing groundwater demand). Groundwater conditions have generally been stable since 2000, apart from years in which there are surface water cutbacks to Feather River diverters. Since 1992, the only cutback years have been 2015, 2021 and 2022. Some portions of the Subbasin rely on groundwater for irrigation in all years, however groundwater extraction increases significantly in cutback years in some areas of the Subbasin where it is a feasible option. **Continued maintenance of, access to and use of surface water from the Sacramento River, Feather River, and Butte Creek for both agricultural and municipal water demands will be important to maintain stable groundwater levels.** The GSAs in this Subbasin are being proactive in working towards the shared goal of sustainably managing groundwater in this Subbasin as can be seen in recent actions to develop the first Periodic Evaluation of the Butte Subbasin GSP, and the continued progress on numerous PMAs aimed at improving groundwater conditions in the Subbasin and a cost share plan to support these efforts.

Vina Subbasin

In the Vina Subbasin, groundwater conditions improved during the 2025 water year. Over both spring and fall seasons, groundwater levels in the RMS wells increased by about 3 feet on average from last year resulting in a positive gain in groundwater storage of about 44 TAF from WY 2024. Most groundwater levels and the corresponding changes in groundwater storage Subbasin-wide have generally been on a downward decline since 2000, but show improvements in the shorter term 10-year timeframe. The longer-term declines correspond with an extended dry period Statewide, punctuated by periodic average and wet years, reflected in these gradual groundwater level declines over the past 25 years. The cumulative change in groundwater storage since 2000, a decrease of about 327 TAF amounts to an average of about 11 TAF per year of decline. While it is important to realize that it is not the management goal of the GSAs to bring groundwater levels back up to the conditions of 2000, flattening out the declining trend is the goal. Over the past 10 years, however, this trend has been positive, averaging about 11 TAF

per year of increased storage and over half of the monitoring wells show gradual increases in groundwater level change. **Actions now can help to adequately address longer trends in groundwater declines and the associated deficits in groundwater storage in preparation for the next drought cycles.** The County is supporting a four-pronged approach to reach sustainability in this Subbasin including 1. Demand reduction and water conservation activities; 2. Increasing surface water supplies to offset and reduce groundwater demand; 3. Increasing recharge, and 4. Planning and policy development. In upcoming years, it will be important to continue understanding the connection between the specific monitoring wells showing long-term declines and areas in the Subbasin where residents have previously reported dry or reduced capacity wells, especially as it relates to future County well ordinance updates. The two GSAs in this Subbasin acknowledge these current conditions and are applying the four-pronged approach to work towards the shared goal of sustainably managing groundwater. This is being accomplished through local and grant funding for GSA operations, projects and addressing data gaps identified in the GSP including the installation of additional monitoring wells in WY 2026.

Wyandotte Creek Subbasin

In the Wyandotte Creek Subbasin, groundwater conditions remained robust during the 2025 water year. Over both seasons, groundwater levels have remained similar to last year; with an associated positive gain in groundwater storage of about 19 TAF. The cumulative change in groundwater storage since 2000 is about 46 TAF which is an increase of about 2 TAF per year.

In the Wyandotte Creek Subbasin, groundwater users benefit from generally stable and shallow groundwater levels supported by the mix of groundwater and surface water supplies to meet water demands in the Subbasin. Review of the hydrographs from monitoring wells in the Subbasin indicate that groundwater elevations, and hence groundwater storage, are relatively stable over time. Groundwater levels seem to track well with wet and dry cycles and respond accordingly, as expected.

The near-term focus for the Wyandotte Creek GSA will be on continued and expanded monitoring through a grant-funded project which included installation of additional monitoring wells in WY 2026. Ongoing access to and use of surface water supplies will also be crucial to preserve the sustainability of the Subbasin. The Wyandotte Creek GSA is proactive in its goal of sustainably managing groundwater in this Subbasin, as can be seen in the recent efforts to generate local funds to support GSA operations and securing grant funds to fill data gaps and advance projects aimed at improving groundwater conditions.

2. Background

This Groundwater Status Report (Report) has been prepared for Butte County annually since 2000, first by the Butte Basin Water Users Association (dissolved in 2012) followed by the Butte County Department of Water and Resource Conservation (Department). The report contents are presented to the Water Commission and the Board of Supervisors in the spring to early summer of each year for the preceding water year (defined as October 1 through September 30). **This report meets the requirements of County Code Chapter 33 which requires the preparation of a groundwater status report based upon the data gathered and analyzed pursuant to Section 33-4 – "Groundwater Monitoring."** This section requires groundwater level measurements to be taken from designated monitoring wells at least four times per year. Wells are monitored DWR and Department staff with a minimum frequency of March, July, August and October of each year.

Butte County hydrogeology includes two different types of groundwater aquifers, fractured rock and alluvial aquifers. In the eastern foothill and mountainous areas of the County, fractured rock aquifers provide variable amounts of water, primarily to domestic wells. In these aquifers, water fills the space between cracks and fractures in the rock. Therefore, the degree of fracturing and the extent to which those fractures are connected, highly influence potential well production. Conditions are highly variable, and the water levels or production of a well in one location do not necessarily provide information on what conditions may be in another well, even if it is nearby. Therefore, groundwater level monitoring is not conducted in the fractured rock areas of the County. This report is directed towards an explanation of groundwater conditions in the alluvial portions of the County as defined by the DWR Bulletin 118 document, which delineates each Subbasin within the valley floor area.

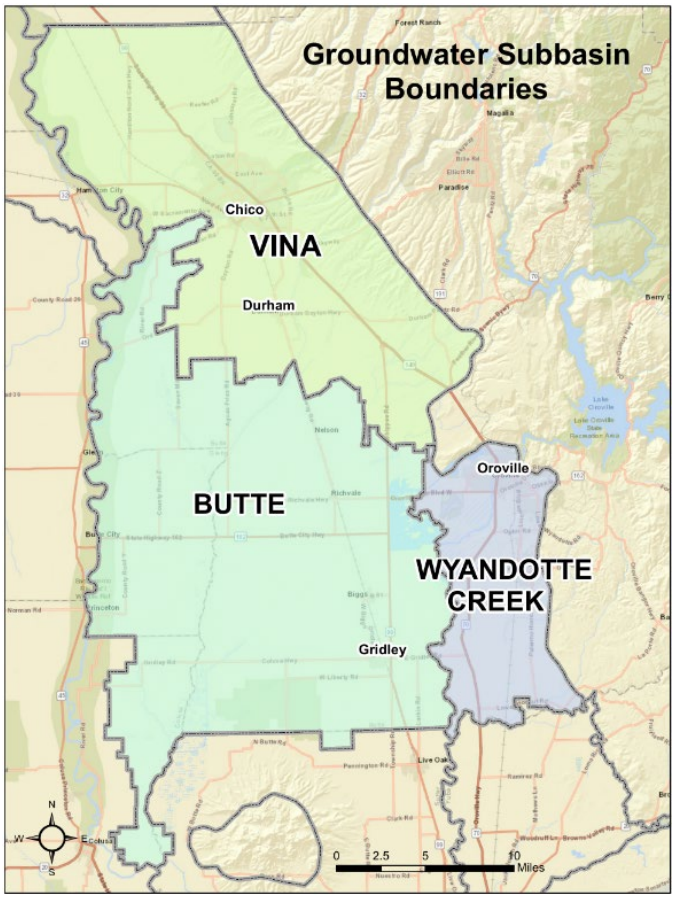


Figure 1. Map of the Subbasins in Butte County

On September 16, 2014, Governor Brown signed into law a package of bills collectively called the Sustainable Groundwater Management Act (SGMA). SGMA requires local management of groundwater Subbasins and provides the state with broad oversight authority and the ability to intervene. Local management of Subbasin(s) are the responsibility of a local public agency or combination of local agencies that designate themselves as the GSA for all or a portion of their Subbasin. **Butte County is one of three member agencies of the two Joint Power Agreements that have been established to form a GSA in both the Vina and Wyandotte Creek Subbasins. In the Butte Subbasin, the County serves as one of the 11 individual GSAs collectively responsible for managing groundwater within this Subbasin**. The County of Butte GSA presides over land within the Butte Subbasin boundaries that are not within any other GSA's jurisdictions. All three of the groundwater Subbasins (see map) within Butte County (Vina, Butte and Wyandotte Creek Subbasins) have one or more GSAs responsible for the development and implementation of a GSP.

Individual GSPs were adopted by the respective GSAs by the regulatory deadline of January 31, 2022, for each of the three Subbasins. GSAs must also submit annual reports to the DWR by April 1st each year (see Attachment A). Annual reports must include the following information:

- General information and location map of the Subbasin
- Groundwater level data (shown as graphs and contour maps)
- Annual aggregated data identifying groundwater extraction for the preceding water year
- Surface water supply used or available for use in the Subbasin
- Total water use
- Change in groundwater storage (shown on a map and graphically)

- Description of progress toward implementing the GSP

A consulting firm, in cooperation with the Department and the GSAs in the three Subbasins, prepared an annual report for each Subbasin to meet the requirements of SGMA. These reports were submitted to the DWR SGMA Portal (https://sgma.water.ca.gov/portal/) and links to the reports are provided in Attachment A to this report.

This is the fourth Butte County Groundwater Status Report (Report) since adoption of the GSPs by the GSAs in the three Subbasins. **The objective of this report is to use the information from each of the three Subbasin's annual reports to help inform a broad County-wide perspective of groundwater conditions and trends.** While recognizing that Subbasin-specific annual reports focus on performance as compared to each Subbasin's policies outlined in their respective GSPs, this Report seeks to recognize a broader County perspective which may differ from the perspective of those managing the Subbasins in accordance with SGMA. **As such, this report outlines some conditions that call for attention, describes efforts to improve groundwater resilience County-wide, offers overall conclusions about Butte County's groundwater resource, and when warranted, offers recommendations for consideration by the Board of Supervisors.** For greater Subbasin specific detail, descriptions, figures, and tables, please refer to the complete annual reports linked in Attachment A.

3. 2025 Hydrological Conditions and Water Supplies

Statewide Conditions

The 2025 Water Year began in the fall of 2024 with an extremely wet November, followed by an exceptionally dry January, and ended with below-average precipitation statewide. Regional conditions however varied significantly, with above-normal precipitation in northern portions of the state and below-normal precipitation in south, where several counties ranked within the bottom 10% of historical levels. Statewide, some hydrologic indicators were below historical averages, including precipitation, snowpack, and temperature, however reservoir storage was above historical averages as seen below.

At the end of the 2025 WY on September 30, 2025 Statewide hydrologic conditions were as follows:

- precipitation was 84% of average at 23 inches (Figure 2.)
- snowpack was 96% of the historical average on April 1
- temperature was 96% of average at a mean 66° Fahrenheit
- reservoir storage was 109% of average at 23.2-million-acre feet

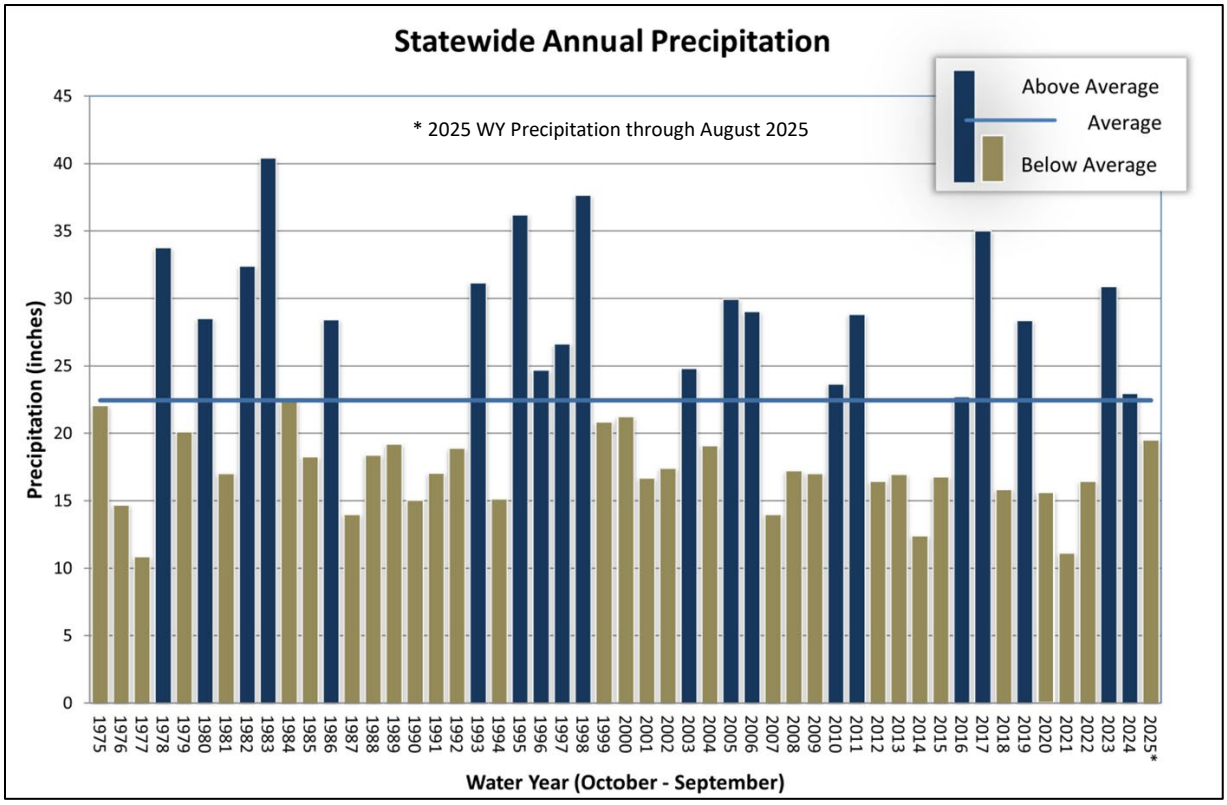


Figure 2. Statewide Annual Precipitation from NOAA National Centers for Environmental Information (DWR, 2025).

Regional Conditions

The Northern Sierra 8-Station Precipitation Index is a collection of eight precipitation gages in the mountains of Northern California which serves as a precipitation index for the Sacramento River hydrologic region. This index provides a regional perspective and indication of statewide water supplies, reflecting higher elevation precipitation and the resulting runoff conditions into the Sacramento Valley. **According to the Northern Sierra 8-Station Precipitation index, the 2025 WY ended with 106% of the long term (1991 - 2020) average.** The California Irrigation Management Information System local climate stations provide an indication of climate conditions (precipitation and evapotranspiration) in the more localized valley region. **Locally, Butte County experienced above average precipitation for the 2025 Water Year**. In the 2025 WY, the Biggs station recorded a total of just under 19 inches of precipitation which is 120% of the long-term average (2016-2024) as seen in Figure 3. below.

In the 2025 WY, the combination of above-average precipitation along with normal snowpack for the region resulted in above-average runoff from the Sierra-Cascade snowpack. This resulted in **Sacramento River Region unimpaired runoff of about 20.3 million acre-feet, or 116% of average at the end of the 2025 WY.** These conditions also contributed to the average flow rates observed locally in both the Sacramento and Feather Rivers as well as in Butte Creek and Big Chico Creek.

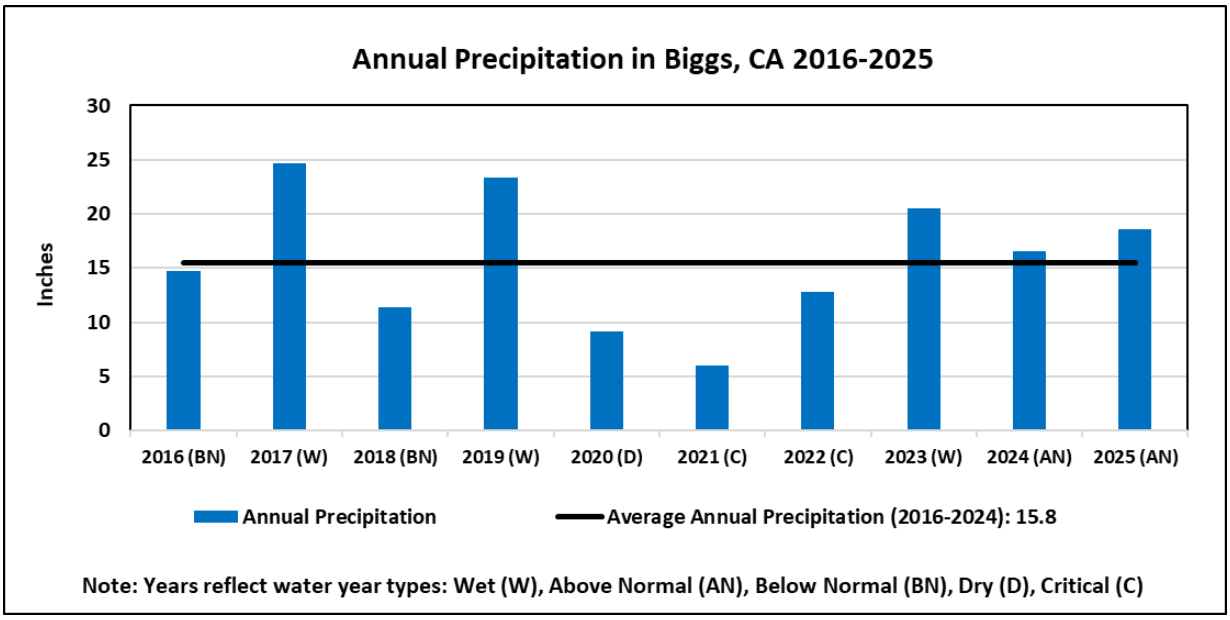


Figure 3. Annual Precipitation from the Biggs, CA California Irrigation Management Information System station from 2016 to 2025 and long-term average

The Sacramento Valley 40-30-30 Water Year Index classification system, developed by the California State Water Resources Control Board for the Sacramento hydrologic basin, is based on Sacramento River runoff. Water year types are based on the index and are identified as *wet, above-normal, below normal, dry*, or *critical*. **In 2025, the Sacramento Hydrologic region was classified as an *above-normal* water year, following an *above-normal* year and one *wet* year.**

Regional Water Supply and Use

All of the statewide and regional conditions mentioned above, including the series of three above-average water years have brought some relief to the water supply conditions including improved groundwater levels and supply (see Table 1), continued availability of local surface water supplies in the waterways within the County, and above-average local reservoir storage levels. 2025 WY water supply conditions led to:

- Table A allocation of 50 percent for State Water Project contractors statewide
- Local Butte County Table A contracted water requests fully supplied (includes Cal Water Oroville and Del Oro Water Company)
- No cutbacks to Feather River diversions in the Butte Subbasin to Western Canal Water District or the Joint Districts (which includes Richvale Irrigation District, Butte Water District, and Biggs-West Gridley Water District within Butte County).
- Sacramento River Settlement Contractor agreements honored with a 100% allocation from the Central Valley Project

Similar to the last two years, these full 2025 WY local allocations significantly increased overall surface water supplies compared to drought or cutback years, particularly in the Butte Subbasin where approximately 84% of the water supply for irrigation was supplied from surface water. This results in less fallowing of rice acreage and a reduction in groundwater pumping to help meet irrigation demands as compared to dry years.

As is typical, groundwater served as the primary water source in the Vina and Wyandotte Creek Subbasins in the 2025 WY, whereas surface water continued to serve as the majority of total water used in the Butte Subbasin through diversions from the Sacramento River, Feather River, and Butte Creek. In all three Subbasins the agricultural sector used most of the groundwater extracted and surface water diverted in 2025. Groundwater continued to serve municipal and rural residential demands in all three Subbasins and provided water for managed wetlands in the Butte Subbasin as shown in Figure 4 below. Surface water was also used to irrigate managed wetlands in the Butte Subbasin.

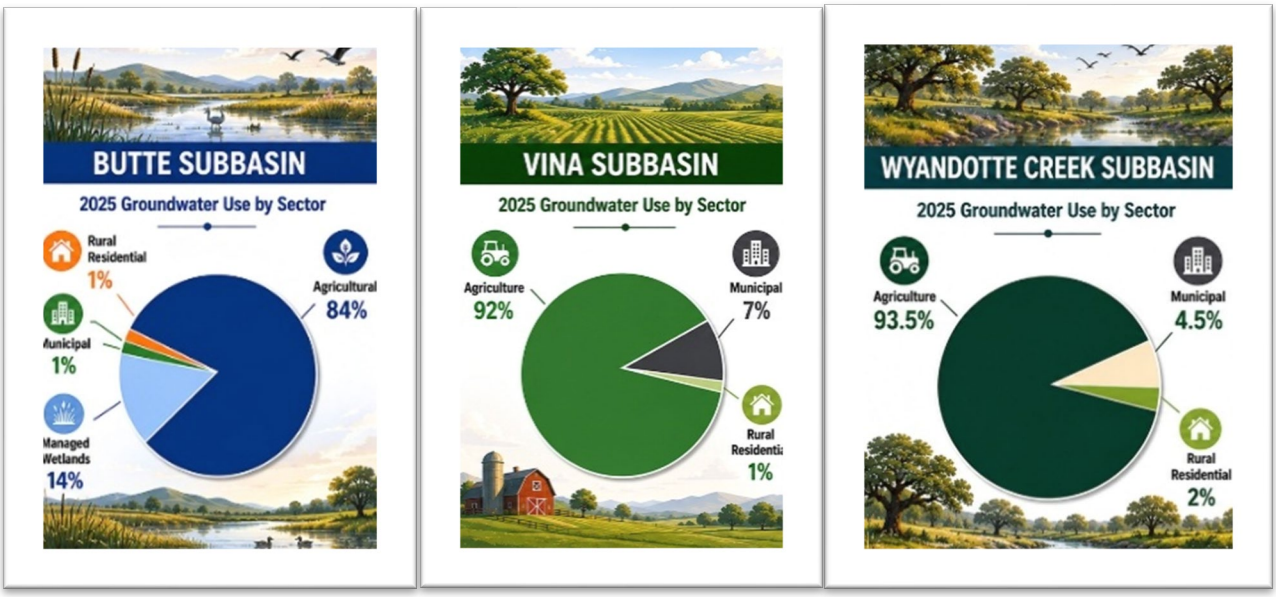


Figure 4. Groundwater Use by Sector in the Butte, Vina and Wyandotte Creek Subbasins in the 2025 Water Year

The Vina and Wyandotte Creek Subbasins used more groundwater in 2025 than 2024, likely due to slightly drier hydrological conditions than the previous year. Between 2024 and 2025, groundwater extractions increased slightly by about 18 TAF in the Vina Subbasin (up to about 262 TAF) and increased approximately 7 TAF in the Wyandotte Creek Subbasin (up to about 41 TAF). However, in the Butte Subbasin which had a full supply of surface water, there was a slight one-year 10 TAF reduction in the amount of groundwater used (down to about 160 TAF).

4. Trends in Groundwater Conditions

Groundwater Levels

About 140 groundwater level monitoring wells in the County have been measured for decades, some back to the 1950s and 1960s. There are several monitoring wells in the Vina Subbasin that show a similar pattern of relatively stable conditions in the 1950s and 60s, sharp declines during the 1976-77 drought followed by recovery, declines during the 1990s drought and again followed by recovery, after five wet

years during the late 1990s. This resulted in historically high groundwater levels observed around the year 2000 in these monitoring wells. Therefore, the year 2000 is a useful reference point. Recent observed trends on groundwater levels include the following:

- **All wells in the Vina Subbasin have seen recovery from the historical lows observed in the most recent droughts of 2020-22 and 2013-2015.** Groundwater levels in the Vina Subbasin's RMS wells increased as compared to last year by an average of about three feet. However, many wells still do have a declining trend line since roughly the year 2000 and there is a long-term deficit in groundwater storage in this Subbasin. Three wetter-than-normal years have not been enough in some areas to recover from groundwater conditions impacted by a series of dry and drought periods that have recurred over the last 20-plus years. However, within the last 10 years most wells in the Vina Subbasin have shown gradual increases in groundwater levels.

- **Groundwater levels in the Butte Subbasin continued to improve with the above-normal 2025 WY conditions and another year of full surface water supply allocations as expected.** This was the third year of three consecutive wetter-than-normal water years, since 2006. Longer-term trends show that conditions are relatively stable and shallow when full surface water allocations are available.

- **Groundwater levels in the Wyandotte Creek Subbasin have continued to rebound in the 2025 WY and have increased in the RMS wells as compared to last year by an average of about three feet.** Longer-term trends show relatively stable conditions and variability associated with wet and dry year cycles.

Many areas of the County have seen groundwater levels rebound and improve during these past three consecutive wetter-than-normal water years. Each of the Subbasin's GSAs have developed GSPs which include a unique measurable objective (MO) for each of the RMS wells within each Subbasin. These MOs are specific, quantifiable goals for the maintenance or improvement of specified groundwater conditions to achieve the sustainability goal for the Subbasin. On average, all RMS wells across all three Subbasins and over both seasons have seen about a 1-foot increase in groundwater levels since last year. On average groundwater levels in the RMS wells were above the MOs in both the spring and fall of 2024 and were on average about 9 feet above the MOs

Groundwater Storage

During years with above-normal hydrological conditions, such as the 2025 WY, increased precipitation and surface water availability results in reduced groundwater pumping compared to dry years. This reduction in groundwater use, combined with enhanced natural recharge rates, improves groundwater storage. In wetter years, there is generally an increased volume of groundwater stored by the end of the WY and in drier years, there is generally a reduced amount of groundwater in storage. Conditions in the 2025 WY led to increases in groundwater storage in two of the three Subbasins from spring 2024 to 2025 as shown in Table 1. Annual groundwater storage increased by about 40 TAF in the Vina Subbasin, and 20 TAF in the Wyandotte Creek Subbasin, but saw slight declines of about 11 TAF in the Butte Subbasin, likely due to the timing and intensity of the precipitation in the area. Two of the three Subbasins still show overall (cumulative) storage lower than it was two decades ago since 2000. In the Butte Subbasin there has been a nominal 19 TAF decrease (a decrease of less than 1 TAF per year) and in the Vina Subbasin there has been an estimated 330 TAF decrease since 2000, (about a 11 TAF decrease per year) however, in the Wyandotte Creek Subbasin there has been an estimated 46 TAF increase since 2000 resulting in

about a 2 TAF increase per year as shown in Table 1. The cumulative change in groundwater storage takes into account each year's annual groundwater storage change over time since 2000 to show the net effect of each annual change.

Table 1. Short- and long-term comparisons of groundwater use, elevation changes and storage conditions across the Butte, Vina and Wyandotte Creek Subbasins (rounded)

Subbasin	2025 Pumping Estimates (TAF*)	Average Spring Change in Groundwater Levels** 2024 to 2025 (feet)	Estimated Change in Groundwater Storage 2024-2025 (TAF)	Cumulative Change in Groundwater Storage since 2000 (TAF)	Change in Cumulative Groundwater Storage since 2000 (TAF) per year
Butte	160	0.4	-11	-20	<-1
Vina	260	3.0	45	-330	-11
Wyandotte Creek	40	3.2	20	45	2

* TAF – Thousand acre-feet

**Groundwater level changes are shown for the Representative Monitoring Site wells.

5. Conditions to Track

Considering the groundwater conditions and trends described above, over the next year there are a few conditions that will be important to monitor closely, which include the following actions:

Track groundwater storage change estimates to support consistent and transparent methods for estimating groundwater storage change across Subbasins. The Department will continue to work with the GSAs and their technical consultant teams to better understand, re-evaluate, and standardize the methods used to estimate change in groundwater storage over time. Previous annual reporting and technical analyses have used different methodologies for different portions of the 2000–2025 time series, which can make it difficult to compare storage change estimates across years and across Subbasins. As part of the Periodic Evaluation work underway in each Subbasin, the Department is providing technical support to review how prior estimates were developed, understand how methods have changed over time, and identify a clear and consistent approach for future annual reporting. Reproducibility, transparency, and stakeholder understanding will be important considerations in any refined methodology. The goal is to work with the GSAs to improve the consistency and usefulness of groundwater storage change information as a tool for understanding long-term trends, communicating conditions, and supporting future groundwater management decisions.

Track and monitor the implementation of projects in the Vina and Wyandotte Creek Subbasins, with a focus on recharge and irrigation efficiency efforts that either enhance the groundwater supply or reduce annual groundwater use. The GSAs in both Subbasins were awarded grant funding to conduct feasibility

and pilot studies for several priority projects identified in their respective GSPs. Key projects in the Vina Subbasin include the Surface Water Supply and Recharge Feasibility Study (led by the Department on behalf of the Vina Subbasin GSAs), a Demand Reduction Strategies project that includes the design of an Extended Orchard Replacement Program and a Precision Irrigation Program, and the Lindo Channel Recharge Feasibility Study. In Wyandotte Creek, the Regional Conjunctive Use Project includes designing an Agricultural Irrigation Efficiency Program and a Surface Water Supply Program. These efforts are intended to support sustainable groundwater management by minimizing groundwater reliance, maximizing recharge opportunities, and providing a clearer understanding of the costs and benefits to guide future implementation and investment decisions.

During the 2025 WY recharge pilot projects were advanced in both Subbasins by grant-funded projects, in line with the County's Recharge Action Plan and Water Code 1242.1 which enables recharge during flooding under specific conditions. Even though the results yielded small volumes overall, the lessons learned were key in informing planning efforts for future projects. The Department anticipates continued involvement through technical support and facilitating collaboration between entities as these efforts continue forward through the GSAs or other implementing partners such as the Tuscan Water District.

Track dry and low production wells and those in areas with longer-term groundwater declines. Groundwater conditions have stabilized over the past three wetter-than-normal water years and are responding as expected. Throughout the groundwater Subbasins in the valley, groundwater conditions are no longer near historical lows, thereby alleviating the risk to domestic wells of impacts due to groundwater level declines. There were no reports to DWR's Dry Well Reporting System or the Butte County Department of Public Health Division of Environmental Health over the 2025 WY.

During the 2025 WY there were five reports to the County's Drought Resilience and Outreach program (https://www.buttecounty.net/2039/Drought-Resilience-Outreach-Project) of households with dry or low production issues that started in the 2025 WY. This program provides resource aid to residents with dry and low production wells. In the 2025 WY the method for dry well reporting shifted from online and call-in reporting to an online application for income based eligible residents to apply to receive access to a broader range of resources than in previous years to help address these conditions. This shift may have resulted in more or less reports than usual. Of those five reports, three were in fractured rock areas of the County near Bangor, Palermo and Lime Saddle Road. Two reports were from the alluvial Wyandotte Creek Subbasin area, near and south of Palermo. Four of the five reports did not indicate how deep the impacted wells were, however; one report from the fractured rock region about three miles east of Palermo indicated that an 800' deep well was impacted. It is unknown if the issues at these wells are due to groundwater level conditions or other issues such as deterioration of aging well infrastructure or equipment (i.e. pumps, wiring, well casings or screens) however assessments to make those determinations are planned for 2026, made possible by the grant-funded program.

The Department will continue to track groundwater conditions in relation to historical low levels to assess upcoming risk of impacts in the near-term and upcoming years depending on what type of hydrological conditions future water years bring. It will also be important to continue to gain a better understanding of the spatial distribution of the dry or low production wells and if the well equipment and infrastructure have reached its useful life. This can inform where and to what extent additional work may be needed to improve groundwater conditions and avoid impacts on domestic wells from lowering groundwater levels.

Track and monitor saline groundwater County-wide. Groundwater quality conditions for salinity, measured as specific conductivity (SC) has been monitored by the Department annually each summer since 2001. Although water quality thresholds defined by the County's Basin Management Objective program sunset in 2022, the Department continues its Groundwater Quality Trend monitoring program for salinity and continues to support the data collection and monitoring needs of the GSAs. The GSAs in each subbasin have established Minimum Thresholds (MT) for salinity as defined in each GSP. In 2025, there were two wells with exceedances of MTs set by the GSAs in their respective Subbasins. One well is in the Colusa County portion of the Butte Subbasin near the Sutter Buttes, an area known to have high naturally occurring concentrations of specific conductivity due to marine sedimentary rocks brought closer to the surface by faulting associated with the formation of the Sutter Buttes. The second well is in the Wyandotte Creek Subbasin southwest of Palermo, a multi-completion well drilled in 2021. This multi-completion well includes three individual wells screened at different depths to monitor conditions in the shallow, intermediate and deep portions of the aquifer system. The SC exceedances were recorded in the intermediate and deep portions of the aquifer. The well has had high levels of SC in these zones (greater than the MT) since the wells were initially developed. It will be important to continue to track conditions in 2026 but also of note is that better characterization of naturally occurring salinity in the Wyandotte Creek Subbasin is needed to help improve appropriate monitoring and management of groundwater with respect to water quality and naturally occurring high levels of salinity in this Subbasin. In the year ahead, the Department anticipates working with DWR to pursue the installation of continuous SC data loggers to understand how these conditions change seasonally and to monitor newly installed monitoring wells to refine the monitoring network and adapt to changing conditions.

Track surface water issues and projects within the Butte Creek watershed. Butte Creek flows through the Vina and Butte Subbasins and is critical habitat for salmonids as well as a significant source of water supply for irrigation. During certain times of the year and in some reaches, Butte Creek recharges the aquifer where it flows. In the Vina Subbasin surface water from Butte Creek provides a small portion of the water supply for irrigators who likely would otherwise use groundwater. Butte Creek is also a significant surface water supply source for irrigation in the Butte Subbasin, reducing reliance on groundwater use. Maintaining the use of surface water, specifically Butte Creek water for irrigation, will be an important aspect of addressing groundwater declines in the Vina Subbasin and will be essential for continued stability in groundwater conditions within the Butte Subbasin.

Support updates to the Butte County well ordinance in coordination with Environmental Health. The Department of Public Health, Division of Environmental Health was awarded funding from the State Water Board to update the Chapter 23B Water Well Ordinance and the Chapter 19 Onsite Wastewater Systems Ordinance. The Department will be participating in the Technical Advisory Committee for the well ordinance review to identify opportunities for improvement, evaluate potential revisions, and ensure consistency with applicable regulations, standards, and policies.

Track groundwater conditions in Subbasins adjacent to the Butte, Vina and Wyandotte Subbasins. There are five Subbasins which share a border with one or more of the three Subbasins: Butte, Vina and Wyandotte Creek. The GSAs in adjacent Subbasins (Los Molinos, Corning, Colusa, Sutter and North Yuba Subbasins) are required to submit an annual report of groundwater conditions to DWR. The Department has and will continue to provide a cursory review of issues identified in the annual reports of adjacent Subbasins, to gauge any potential impacts to County conditions while highlighting any reports of undesirable results. In the 2025 WY, there were no reports of undesirable results in any of the adjacent Subbasins, however; there are two Subbasins noteworthy of tracking closer in the upcoming year, the

Corning and Colusa Subbasins. The Corning Subbasin may potentially be in a stressed state as indicated by several wells that approached groundwater level MTs in the 2025 WY. Nine wells had groundwater levels below their MT and 43 had levels below their MO in fall of 2025. Conditions in the Colusa Subbasin are also worth tracking. Although this Subbasin shows no MT exceedances for groundwater levels in the 2025 WY, some wells along the western boundary have not recovered since the 2000-2022 drought period. Additionally, the areas of Orland and Arbuckle continue to experience subsidence although the rates have slowed in recent wetter-than normal years. The GSAs in both Subbasins have or are planning to implement demand management and well mitigation programs.

During the 2025 WY the Inter-Basin Coordination project continued to evaluate any significant differences, uncertainties, and potential issues of concern related to groundwater interaction at the Subbasin boundaries and conducted a comparison of the modeling tools identified in GSPs. Documents and webinars presenting the results are available online at https://www.buttecounty.net/2218/Inter-Basin-Coordination-in-the-Northern

6. Current Efforts to Improve Groundwater Resilience

The County, in coordination with the GSAs within all three Subbasins, is committed to sustainable groundwater management through continued monitoring, reporting, public outreach and providing technical staff support to the GSAs. DWR's Northern Region Office and the Department directly collect groundwater level measurements from monitoring wells within all three Subbasins at least four times per year while some wells are monitored monthly by DWR staff. Some wells are also equipped with hourly data loggers and telemetry stations to obtain continuous real-time data which is easily accessible on public webpages. Additionally, the Department has been coordinating with DWR and the GSAs to incorporate wells designated as groundwater quality RMS by the GSAs into the County's monitoring network. The Department and DWR have also been working to acquire new access agreements for the continued monitoring of wells throughout the County and have started video-logging a portion of the wells in the network to enhance and update our understanding of the monitoring network by verifying well types, proximity to surface waters and well construction details such as well depths and screening intervals. Planning for installation of new monitoring wells was underway in WY 2025 in all three Subbasins as well. The Vina and Wyandotte Creek GSAs also initiated grant-funded work to inventory and better characterize domestic well infrastructure (i.e. well locations and depths), assess the current monitoring network and suggest enhancements to fill data gaps through the Periodic Evaluation efforts. Additionally, a community well monitoring program was initiated in 2025. The Department has provided input to these efforts given historical interaction with these datasets and relevance to County-wide planning.

Reporting on groundwater conditions has and will continue to refine and enhance the County's understanding of complex groundwater conditions and trends within Butte County. The Department remains committed to continuing to provide a service to residents by providing timely, succinct and understandable information to residents of Butte County to increase awareness and knowledge about groundwater resources and their condition.

The GSAs are seeking to form collaborative opportunities to implement future GSP projects. Grant-funded projects will be completed in the Vina and Wyandotte Creek Subbasins in WY 2026. The GSAs are planning beyond the grant-funded phase to identify the next steps that build off the efforts and lessons learned from the completed grant-funded feasibility studies and are planning for future collaborative opportunities with other entities. In the Butte Subbasin a cost-share agreement amongst all 11 GSAs

continues to fund SGMA compliance efforts such as development of the 2027 Periodic Evaluation, annual reporting efforts each year and shallow well installation efforts.

The County is assessing the degree to which domestic wells may become vulnerable to negative impacts from potential future declines in groundwater levels within each Subbasin. The Department has been involved in updating the Drought Preparedness and Mitigation Plan as related to Senate Bill 552 (2021) which assigned new responsibilities and requirements for the state and local agencies to help small water suppliers and rural communities reduce their risks of inadequate water supply amid a water shortage event. As part of compliance with Senate Bill 552, the County has continued revising the Drought Preparedness and Mitigation Plan which will include a drought and water shortage risk assessment, identify short-term and long-term response actions that specifically address state small water systems and domestic wells, and will incorporate other mitigation considerations. Implementation of these efforts is consistent with Board direction resulting from the Drought Impact Analysis Study conducted in 2022.

Additionally, during the 2025 WY the Department, in collaboration with the South Feather Water and Power Agency continued its efforts to initiate the Palermo Clean Water Consolidation Project, focused on bringing clean drinking water to more than 380 households dependent on domestic groundwater wells impacted by localized flooding and water quality issues. A portion of the Clean Water Consolidation Project was implemented to provide Palermo residents with dry wells, treated surface water from a local municipal service water provider and also to offset groundwater use in this area.

The Department has continued to engage on work on the Palermo master drainage project to address drainage deficiencies in the south Oroville watershed, particularly Maintenance District No. 6. The work has expanded to include engagement with the Wyandotte Creek GSA consultants working on the Regional Conjunctive Use grant-funded project which is aimed at promoting drought resilience through reduced reliance on groundwater use. The drainage project and Regional Conjunctive Use project teams worked towards an integrated and multi-benefit approach to flood management, surface water use, and recharge opportunities.

7. Conclusions and Recommendations

Groundwater conditions in all three Subbasins are on track to meet the first 5-year 2027 interim milestones for groundwater levels at each of the RMS wells. On average groundwater levels in RMS monitoring wells over both the spring and fall of 2025 across all Subbasins were above their Measurable Objectives by an average of about nine feet. Groundwater levels remained within each Subbasin's Margin of Operational Flexibility and were well above the MT defined for each groundwater level RMS well in 2025, with no reports of undesirable results. While there were two exceedances of the salinity-related MTs, better characterization of naturally occurring salinity in the future will help improve appropriate monitoring and management of groundwater with respect to groundwater quality in these Subbasins.

In years with above-normal hydrological conditions such as the 2025 WY, attention is drawn to the importance of capturing, conveying, and storing high flows from precipitation events. While these consecutive wet and above-normal conditions can help fill reservoirs and improve surface water supplies locally, they are more of a rare occurrence than a regular one. Since 2000, there have been 16 *below-normal, dry or critical* water years and only 10 *above-normal or wet* water years. The 2005-2006 and 2023-2025 periods were the only consecutive wet and above-normal year cycles. **The 2026 WY has been classified as another *above-normal* year, and as a result, a continued similar positive response in**

groundwater conditions in all three Subbasins as seen in the 2025 WY, as well as little to no reports of dry or low production wells, are expected. Over the long-term, as the Butte, Vina and Wyandotte Creek Subbasin GSPs and neighboring GSPs are implemented, these Subbasins and the surrounding region will be better positioned to manage and mitigate drought conditions with increased groundwater resiliency and thus impacts of future droughts may be less severe and / or less costly. Recent progress and activities described herein and detailed in the Annual Reports, linked in Attachment A, demonstrate the commitment of the County and GSAs to implement the GSPs by allocating the necessary time and resources to achieve long-term sustainable management of the groundwater resources in the three Subbasins.

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Appendix A

Links to the Butte, Vina and Wyandotte Creek Subbasin's Annual Report - 2025 Water Year

Links to the Butte, Vina and Wyandotte Creek Subbasin's Annual Report - 2025 Water Year

Butte Subbasin Annual Report link:

https://www.buttebasingroundwater.org/gsp-info

Vina Subbasin Annual Report link:

https://www.vinagsa.org/vina-groundwater-sustainability-agency-documents

Wyandotte Creek Annual Report link:

https://www.wyandottecreekgsa.com/gsp-and-annual-reports

APPENDIX 1-D
Communication and Engagement Plan

Wyandotte Creek
GROUNDWATER SUSTAINABILITY AGENCY

Stakeholder Communications and Engagement Plan

Sustainable Groundwater Management Act (SGMA)

Implementation 2021-2023

Version: 11.22.2021

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Objectives

The Wyandotte Creek Groundwater Sustainability Agency (GSA) Board, the GSA Management Committee, and the GSA Stakeholder Advisory Committee are committed to keeping the **public informed**, providing the public with **balanced and objective information** to assist the public in understanding the Sustainable Groundwater Management Act (SGMA), available options and recommendations, and **creating an open process** for public input on development and implementation of the Groundwater Sustainability Plan (GSP). The primary objective of this Communication and Engagement Plan is to identify and carry forward intentional, effective engagement to ensure widespread support and understanding for the GSP and its implementation. Additionally, during GSP implementation an important objective will be to identify and engage those groups that have been underrepresented in the process to date using *Guidance on Engagement and Communicating with Underrepresented Groundwater Users* developed by the California Department of Water Resources.

Background

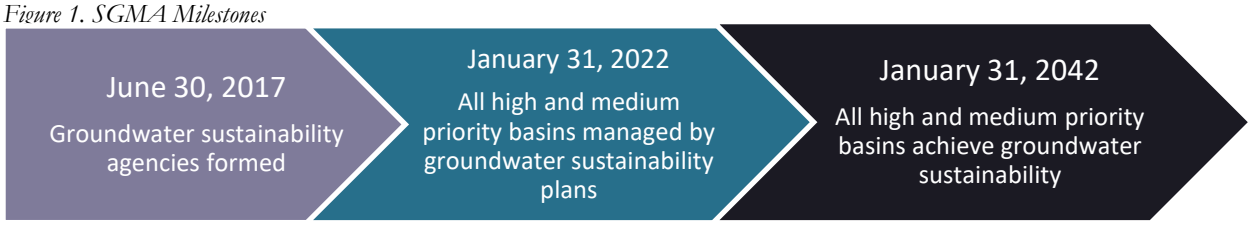
Signed into law in 2014, the purpose of SGMA is to ensure local sustainable groundwater management in medium- and high- priority groundwater basins statewide. California's Department of Water Resources has determined that Butte County has three priority subbasins that are subject to SGMA implementation:

Butte Subbasin | Vina Subbasin | Wyandotte Creek Subbasin

This Communications & Engagement Plan applies only to the Wyandotte Creek Subbasin.

SGMA Milestones: The subbasin achieved the first milestone in SGMA by the establishing the Wyandotte Creek Groundwater Sustainability Agency (GSA), a Joint Powers Authority, comprised of three (3) member agencies: Butte County; the City of Oroville; and Thermalito Water and Sewer District. The second major milestone in SGMA is the adoption of a Groundwater Sustainability Plan (GSP) by January 30, 2022. The GSP is prescribed by SGMA and contains required elements. The third milestone is achieving sustainability by 2042.

Figure 1. SGMA Milestones



Desired Outcomes & Goals of the Plan

Outcomes: The desired outcome of this Communications & Engagement plan is to achieve understanding and support for GSP adoption and implementation in consideration of the people, economy, and environment within the subbasin and in coordination with adjacent subbasins.

Plan Goals: SGMA requires the GSA to consider the interests of all beneficial uses and users of groundwater and encourage involvement of diverse social, cultural, and economic elements of the population within the subbasin during GSP preparation and implementation. The goals of the Communications & Engagement Plan are to:

1. **Enhance understanding** and inform the public about water and groundwater resources in the Wyandotte Creek subbasin, the purpose and need for sustainable groundwater management, the benefits of sustainable groundwater management, and the need for a GSP.
2. **Engage diverse interested parties** and stakeholders and promote informed feedback from stakeholders, the community and groundwater-dependent users throughout the GSP preparation and implementation process.
3. **Coordinate communication** and involvement between the GSA (Board, Stakeholder Advisory Committee and Management Committee), and other local agencies, elected and appointed officials, and the general public.
4. **Rely on the Stakeholder Advisory Committee** to facilitate a comprehensive public engagement process.
5. **Employ a variety of outreach methods** that make public participation accessible and that encourage broad participation.
6. **Respond to public concerns**.
7. **Provide accurate and up-to-date information**.
8. **Create public value and use GSA resources wisely** by managing communications and engagement in a manner that is resourceful and efficient.

Time Period: This C&E Plan is intended to cover communications and engagement for September 2021 through December 2023. In September of 2021, the GSA Board released the draft GSP for a 45-day review. As required and planned, the GSA Boards held a formal public hearing(s) on the Draft GSP in the fall and then adopted the GSP in December of 2021 for submittal to DWR in January 2022 as the law requires. This Plan will also support the first two years of implementation. Since this is a multi-year effort, the key activities needed to achieve these goals will be broken down into annual work plans, and may be amended, as needed.

Interested Parties and other Stakeholders: SGMA identifies interested parties that the GSA must consider when developing and implementing the GSP, including:

- Agricultural users of water
- Domestic well owners
- Municipal well operators
- Public water systems
- Land use planning agencies
- Environmental users of groundwater
- Surface water users
- The federal government
- California Native American tribes (see DWR Guidance Documents) for Tribal Outreach Guidance Document)
- Disadvantaged communities (including those served by private domestic wells or small community water systems).

Outreach Roles

The **GSA Board** is comprised of elected officials from each of the member agencies and two stakeholder board members appointed by the Butte County Board of Supervisors, representing commercial agricultural and domestic well users in the subbasin. As required by the Joint Powers Authority agreement that created the GSA, the Board will consider the recommendations of the Stakeholder Advisory Committee.

In regard to outreach, the Board is responsible for:

- Adopting and overseeing implementation of the C&E Plan;
- Entering into Memoranda of Understanding with other public agencies such as South Feather Water and Power to codify agency-to-agency engagement activities for the development and implementation of the GSP;
- Receiving public comments made verbally and in writing;
- Considering the recommendations of the Stakeholder Advisory Committee.

In addition, the Board may choose to play a more active role in outreach through communication with the public, stakeholder groups, and the entities it represents.

The **Management Committee,** established by the Board, is comprised of at least one staff representative from each of the public agencies that are members of the GSA. As required by the Joint Powers Authority agreement, the Management Committee shall recommend agenda items, administer the Stakeholder Advisory Committee, establish and administer technical working groups, and bring staff reports before the Board.

In regard to outreach, the Management Committee is responsible for:

- Development and implementation of the C&E Plan with Board approval and oversight;
- Administering the Stakeholder Advisory Committee and ad hoc technical advisory committees;
- Documenting the recommendations of the Stakeholder Advisory Committee in staff reports to the Board.

The **Stakeholder Advisory Committee** is comprised of members appointed by the GSA Board. The Stakeholder Advisory Committee is charged with actively engaging with the public for input and feedback.

This charge will be carried out through various activities, but generally includes:

- Actively seeking input from represented stakeholder groups on groundwater-related issues before the GSA, as described in the Charter adopted by the GSA Board;
- Sharing input and feedback at Stakeholder Advisory Committee meetings;
- Making recommendations to the Board.

When evaluating the options and making decisions, the Board, Management Committee, and Stakeholder Advisory Committee will **solicit public input** through a range of methods, including public workshops, written and verbal comments, meetings with stakeholder organizations, and other opportunities. Input is always welcome verbally during public comment periods at the Stakeholder Advisory Committee and Board meetings or in writing sent to GSA General Manager.

Communications and Engagement for GSP Planning and Implementation

To truly engage the public in developing, adopting, and implementing a GSP that is science-based, complex, technical, and outcome-driven, the GSA strives to meet these overall objectives:

- Educate the public in meaningful ways. Communicate what may often be complex concepts in straightforward, comprehensible ways;
- Show how the input received has been incorporated into the plan or process; and
- Remain focused on results.

The GSA carried out community engagement during the development of the GSP, which included public meetings and materials shared to inform the public and then revised to incorporate public feedback. This plan aims to build on that foundation to now engage the community, interested parties, stakeholders, organizations, and agencies as the GSA Board considers adopting the GSP and inaugurating GSP implementation. The GSA Board will complete a final review of the GSP in September before releasing the draft for a 60-day public review period. The GSA will hold a formal public hearing in the fall. Then, the Board will consider adopting in December of 2021 for a January 2022 submittal.

Implementing the GSP will begin at the end of January 2022. Implementation will involve advancing projects, addressing data gaps, monitoring, and developing additional needed projects as part of adaptive management. The GSA will need to prepare annual reports and five-year updates to demonstrate progress toward sustainability. Public outreach will inform each of these activities.

Forums

Member Agencies Governance Briefings

Member Agency Board members may brief their councils or boards regularly on GSA activities and may work with the GSA Management Committee to provide additional briefings on sensitive or important topics.

Stakeholder Briefings

Stakeholder Advisory Committee members will meet with and communicate regularly with organizations

comprised of the stakeholder groups they represent. To promote consistent messaging, all briefings will be coordinated with the GSA Management Committee.

Public Meetings/Hearing

Public meetings or hearings are formal opportunities for people to provide official comments on programs, plans, and proposals. The Wyandotte Creek GSA Board meetings and the Stakeholder Advisory Committee meetings constitute regular public meetings that will be noticed and conducted in accordance with the Ralph M. Brown Act. SGMA requires that a public meeting be held prior to the adoption of a fee and that public hearings are held for the adoption of GSP elements and the final GSP plan. There are also constitutional requirements for public hearings for some fee/rate options. Public meetings and hearings are an important forum for people to share viewpoints and concerns, but often occur at the end of a process, when only one option is under consideration. The GSA will hold required public meetings and hearings, but will also use less formal public workshops to solicit feedback and information throughout the process.

Public Workshops

Public educational workshops provide less formal opportunities for people to learn about groundwater, SGMA, and GSP elements. Workshops can be organized in a variety of ways, including webinars, open houses, "stations" where people can ask questions one-on-one, and traditional presentations with facilitated question and answer sessions. To solicit feedback from people who may not be comfortable speaking in public, workshops can include small group breakout discussions, comment cards, and other techniques. Whatever format is used, workshops will be designed to maximize opportunities for public input.

Public Notices

Public notices, often required by law, aim to notify agencies and the public about activities that may affect the public. As outlined in this Communications and Engagement Plan, the GSA will sponsor a variety of opportunities for people to participate in the development and implementation of the GSP, including workshops, public hearings, providing comments at Board and Stakeholder Advisory Committee meetings and through written comments. And, the agency will comply with public noticing requirements.

Prior to GSP adoption or amendment, SGMA requires that the GSA:

- Provide notice to cities and counties within the Plan area
- Consider comments provided by the cities and counties
- Accommodate requests for consultation received from the cities and counties within 30 days
- No sooner than 90 days following public notice, hold a public hearing

In addition, when the GSA considers any fees to support the work of sustainability, the GSA will provide public notice and other engagement activities.

Tools

The Wyandotte Creek GSA will use a variety of communications and engagement tools to keep the public informed, including the following.

Interested Parties List

The GSA maintains an interested parties list, consistent with SGMA requirements. The list is broad and includes anyone who would like to stay informed about SGMA activities and anyone the Board and Stakeholder Advisory Committee thinks should be informed about the GSP process and the outcomes of the planning effort. The Management Committee coordinates the distribution of periodic updates to the interested parties list. The GSA also relies on the list for sharing information on public workshops, public meetings, and other SGMA implementation related activities.

Note, SGMA did not specify the type of list (email versus hard copy mailing) that should be used to inform interested parties. The first preference for information sharing is the email list to distribute information quickly and to reduce costs. In addition, the GSA may periodically distribute public notices in the form of post cards and/or published notices.

Informational Materials

Developing a variety of informational materials is critical to successful education and necessary to circulate consistent, accurate information. The Wyandotte Creek Advisory Committee identified the importance of using traditional, print media and direct mailing to engage stakeholders in this subbasin and encouraged the Management Committee to translate materials in Spanish and Hmong, as warranted. The Management Committee with input from the Stakeholder Advisory Committee may develop a range of materials, which may include:

- Talking Points: Clear, concise messages to be used by the Management Committee, Board, or Stakeholder Advisory Committee members when communicating with media, organizations, and stakeholders.
- Milestone Fact Sheets: For initiating the GSP and completion of elements of the GSP.
- Periodic Updates: As stated above, the Management Committee will coordinate on the distribution of periodic updates that can then be used by the Stakeholder Advisory Committee for distribution to the groups and organizations they represent using existing communications tools, such as newsletters, social media, list serves, etc.
- Newspaper Editorials: Authored by the Management Committee, Board, or Stakeholder Advisory Committee members (after review and approval of the full Advisory Committee and Management Committee) for submittal to local news sources.
- Briefing Packets: For milestone briefings to the public and stakeholders. Packets will include standard talking points, and other materials to assist in educational outreach and for soliciting feedback.
- Direct mailings: Such as postcards to inform stakeholders of opportunities for ongoing involvement in SGMA implementation.

Website

The Wyandotte Creek GSA website https://www.wyandottecreekgsa.com will continue to be a tool for distributing and archiving meeting and communication materials as well as a repository for any studies and informative, educational materials. The Management Committee will coordinate to ensure that the website is updated on a consistent basis to ensure up to date, timely information. The website will include the following information:

- Home page: summary, calendar of meetings and events, highlighted topics

- Groundwater basics, SGMA background including links to existing sources of relevant information, such as https://groundwaterexchange.org.
- Wyandotte Creek subbasin specific information
- Board of Directors information: Board members, agendas, and meeting materials
- Stakeholder Advisory Committee information: Stakeholder Advisory Committee members, agendas, and meeting materials

Mailings and Utility Bill Notifications

Individual member agencies may utilize postcards and include updates and relevant GSP development information in utility bills.

Social Media

Existing Facebook, Twitter, and other emerging social media technologies may be leveraged to provide updates on milestone progress to interested parties.

Surveys

Online tools, such as Survey Monkey, may be used periodically to gather stakeholder ideas and to provide feedback on key issues.

Media Plan

The Management Committee will develop press releases and Public Service Announcements (if appropriate) at each milestone and for meetings and workshops. The press releases will be distributed to local and regional media, including print media and radio, as well as to elected officials. See Appendix B for a media contact list that will be updated on a periodic basis.

Outreach Partners

In addition to the communication tools listed above, other organizations can also partner to assist the Wyandotte Creek GSA reach its communications and engagement goals, including:

- ✓ Butte County Farm Bureau;
- ✓ The Groundwater Pumpers Advisory Committee (GPAC);
- ✓ Butte County Water Commission;
- ✓ Butte Environmental Council;
- ✓ Upper Feather River Integrated Regional Water Management (IRWM) and the North Sacramento Valley IRWM group
- ✓ Butte County Resource Conservation District;
- ✓ Oroville Chamber of Commerce (calendar); and
- ✓ Oroville Rotary Club.
- ✓ Agricultural Groundwater Users of Butte County
- ✓ Local churches
- ✓ Granges

Intra- and Inter-Basin Coordination

For more information, please reference the Inter-Basin Coordination Report.

Intra-Basin Coordination

The Wyandotte Creek GSA entered into a Memorandum of Understanding with the South Feather Water and Power Agency specifying the parameters of the two agencies' coordination and working partnership on GSP review, preparation and implementation.

Inter-Basin Coordination

While inter-basin agreements are optional under SGMA, the Wyandotte Creek GSA participated in the development of the inter-basin coordination framework described in the report linked above which will also be appended to the GSP. The GSA intends to coordinate with 11 subbasins in the Northern Sacramento Valley. During GSP development, the subbasins developed an inter-basin coordination directory, a technical information-sharing template, an outreach presentation, an outreach fact sheet, and an inter-basin coordination web page and held regular staff meetings. Management Committee staff established a framework for coordination during GSP implementation including information sharing, joint analysis and evaluation, coordination on mutually beneficial activities, coordination on communication and outreach, and an issue-resolution process.

Evaluation and Assessment

Any communication strategy should include opportunities to check in at various points during implementation to ensure that it is meeting the communication and engagement goals and complying with SGMA. These check-ins will occur at least on an annual basis.

Appendix A: Tribal Engagement in Butte County

Tribes in Butte County

There are four[1] federally-recognized Native American tribes in Butte County, including:

- Mechoopda Indian Tribe of Chico Rancheria – *located in Vina Subbasin*
- Concow-Maidu Tribe of the Mooretown Rancheria – *partially located in the Wyandotte Creek subbasin*
- Tyme Maidu Tribe of the Berry Creek Rancheria – *partially located in the Wyandotte Creek Subbasin*
- Enterprise Rancheria of Maidu Indians of California – *located in basin not subject to SGMA*

The KonKow Valley Band of Maidu Indians is also recognized by the County and the State and has applied for federal recognition.

Meaningful Tribal outreach, dialogue, and consultation is a shared obligation of all the GSAs in the applicable subbasin where Tribal lands exist. However, since Tribal lands are predominately in unincorporated portions of Butte County, Butte County has led SGMA-related outreach and consultation efforts with the Mechoopda Indian Tribe and the Mooretown Rancheria.

Outreach Conducted

During development of the GSAs and GSPs, Butte County staff reached out to tribes in the County to discuss interest in participating as members of the Joint Powers Agreement (Wyandotte/Vina) or Advisory Committees within any of the three subbasins, even those outside of tribal boundaries. The Wyandotte Creek GSA reserved a tribal seat within the advisory committee charter. There are no tribes currently participating in the committee.

Wyandotte Creek Subbasin Tribal Outreach

Butte County staff coordinated with the Concow-Maidu Tribe of the Mooretown Rancheria, the Tyme Maidu Tribe of the Berry Creek Rancheria and the Enterprise Rancheria of Maidu Indians of California first through communications with the tribal chair and administrative officer in 2018. A tribal member was designated by the Tyme Maidu Tribe of the Berry Creek Rancheria in 2019 to represent the tribe during GSP development and elected to participate as a member of the Stakeholder Advisory Committee prior to the inaugural meeting of the WAC; however, there are no tribes currently participating in the committee.

[1] Source: https://www.ihs.gov/california/index.cfm/tribal-consultation/resources-for-tribal-leaders/links-and-resources/list-of-federally-recognized-tribes-in-ca/?mobileFormat=0

Appendix B: Media Contact List

Media Outlet			
Organization	Name	Email	Phone
Action News Now		news@actionnewsnow.com	
Chico Enterprise Register		localnews@chcioer.com	
Chico News and Review		chiconewstips@newsreview.com	
Forest Ranch Post		Forestranchpost@gmail.com	
Gridley Herald		publisher@gridleyherald.com	
KCHO News		kchonews@csuchico.edu	
KHSL TV Channel 12		news@khsltv.com	
KNVN		N/A	
KRCR Channel 7		ksaam@krcrtv.com	
KRBS		krbs@cncnet.com	
KZFR		Marc.68@gmail.com	
NCEN		tsullivanhames@ncen.org	
News 10		desk@news10.net	
Oroville Mercury Register (Legals)		(Same as Chico Enterprise Record)	
Paradise Post		rsilva@paradisepost.com	
Plumas News		info@plumasnews.com	
211		211resourceteam@helpcentral.com	
Other			

Appendix C: Outreach and Engagement Meetings already Conducted

The GSA has engaged in a range of public engagement activities since GSA formation in 2017, including maintaining a website, monthly newsletters, and numerous public meetings. The GSA also sent post cards to all domestic well owners to raise awareness about SGMA and GSA planning. Lastly, here is the list of meetings that have taken place since forming the GSAs as the Groundwater Sustainability Plan has been developed.

Website updated Regularly

Wyandotte Creek: https://www.wyandottecreekgsa.com

GSP Public Comment Web Page

Wyandotte Creek: https://www.wyandottecreekgsa.com/public-comment-period-now-open

Water Solutions Monthly E-Newsletters

http://www.buttecounty.net/waterresourceconservation/Water-Education/Newsletters-2021

Postcards sent to Domestic Well Owners

3,060 post cards on 4/29/18
1,206 post cards on 4/5/21

SGMA Public Meetings		
Date	**Subbasin**	**Meeting**
2/27/18	All Subbasins in Butte County	Butte County Board of Supervisors
3/13/18	All	Board of Supervisors
3/22/18	All	Board of Supervisors
6/12/18	All	Board of Supervisors
6/26/18	All	Board of Supervisors
7/24/18	All	Board of Supervisors
7/24/18	Wyandotte Creek	Public Hearing
8/1/18	All	Water Commission
8/14/18	All	Board of Supervisors
9/5/18	All	Water Commission
9/11/18	Wyandotte Creek	Public Hearing
9/17/18	All	Groundwater Pumper Advisory Committee
9/25/18	All	Board of Supervisors
10/3/18	All	Water Commission
10/9/18	All	Board of Supervisors
10/23/18	All	Board of Supervisors
11/5/18	All	Groundwater Pumper Advisory Committee
11/7/18	All	Water Commission
1/2/19	All	Water Commission
1/17/19	All	Groundwater Pumper Advisory Committee

1/29/19	All	Board of Supervisors
2/6/19	All	Water Commission
2/25/19	All	Groundwater Pumper Advisory Committee
3/6/19	All	Water Commission
4/3/19	All	Water Commission
4/23/19	All	Board of Supervisors
5/1/19	All	Water Commission
5/21/19	All	Board of Supervisors
5/28/19	Wyandotte Creek	GSA Board of Directors
6/5/19	All	Water Commission
6/6/19	All	Technical Advisory Committee
6/11/19	All	Board of Supervisors
6/25/19	All	Board of Supervisors
6/27/19	Wyandotte Creek	GSA Board of Directors
7/23/19	All	Board of Supervisors
7/24/19	All	Groundwater Pumper Advisory Committee
8/7/19	All	Water Commission
8/27/19	Wyandotte Creek	GSA Board of Directors
9/4/19	All	Water Commission
9/26/19	Wyandotte Creek	GSA Board of Directors
10/2/19	All	Water Commission
10/24/19	Wyandotte Creek	GSA Board of Directors
11/5/19	All	Board of Supervisors
11/6/19	All	Water Commission
11/19/19	All	Board of Supervisors
11/21/19	All	Technical Advisory Committee
12/4/19	All	Water Commission
12/17/19	All	Water Policy Workshop-BOS
1/8/20	All	Water Commission
1/14/20	All	Technical Advisory Committee
1/23/20	Wyandotte Creek	GSA Board of Directors
2/5/20	All	Water Commission
2/11/20	Wyandotte Creek	GSA Board of Directors
2/27/20	Wyandotte Creek	GSA Board of Directors
3/4/20	All	Water Commission
3/24/20	All	Board of Supervisors
4/1/20	Wyandotte Creek	Basin Setting Public Meeting
5/26/20	Wyandotte Creek	GSA Board of Directors
6/3/20	All	Water Commission
6/23/20	Wyandotte Creek	Public Meeting
8/5/20	All	Water Commission

8/19/20	All	Groundwater Pumper Advisory Committee
8/27/20	Wyandotte Creek	GSA Board of Directors
9/2/20	All	Water Commission
9/24/20	Wyandotte Creek	GSA Board of Directors
10/22/20	Wyandotte Creek	GSA Board of Directors
10/27/20	All	Board of Supervisors
11/4/20	All	Water Commission
11/10/20	All	Technical Advisory Committee
12/2/20	All	Water Commission
12/16/20	Wyandotte Creek	Wyandotte Creek Advisory Committee
1/4/21	All	Technical Advisory Committee
1/6/21	All	Water Commission
1/7/21	Wyandotte Creek	Wyandotte Creek Advisory Committee
1/28/21	Wyandotte Creek	GSA Board of Directors
2/3/21	All	Water Commission
2/4/21	Wyandotte Creek	Wyandotte Creek Advisory Committee
2/25/21	Wyandotte Creek	SMC Workshop/Board
3/3/21	All	Water Commission
3/4/21	Wyandotte Creek	Wyandotte Creek Advisory Committee
3/10/21	All	Brown Bag Seminar
3/23/21	All	Board of Supervisors
3/25/21	Wyandotte Creek	GSA Board of Directors
4/1/21	Wyandotte Creek	Wyandotte Creek Advisory Committee
4/7/21	All	Water Commission
4/22/21	Wyandotte Creek	Board of Supervisors
5/5/21	All	Water Commission
5/6/21	Wyandotte Creek	Wyandotte Creek Advisory Committee
5/11/21	Wyandotte Creek	GSA Board of Directors
5/24/21	All	Technical Advisory Committee
5/25/21	All	Board of Supervisors
6/2/21	All	Water Commission
6/22/21	All	Board of Supervisors
6/24/21	Wyandotte Creek	GSA Board of Directors
6/28/21	All	Brown Bag Seminar
7/1/21	Wyandotte Creek	Wyandotte Creek Advisory Committee
7/22/21	Wyandotte Creek	GSA Board of Directors
8/4/21	All	Water Commission
8/5/21	Wyandotte Creek	Wyandotte Creek Advisory Committee
8/26/21	Wyandotte Creek	GSA Board of Directors
9/1/21	All	Water Commission
9/2/21	Wyandotte Creek	Wyandotte Creek Advisory Committee

9/23/21	Wyandotte Creek	GSA Board of Directors
10/6/21	All	Water Commission
10/20/21	Wyandotte Creek	Wyandotte Creek GSP Public Workshop
10/26/21	All	Board of Supervisors
10/28/21	Wyandotte Creek	GSA Board of Directors
11/3/21	All	Water Commission
11/4/21	Wyandotte Creek	Wyandotte Creek Advisory Committee
12/1/21	All	Water Commission
12/14/21	All	Board of Supervisors

APPENDIX 1-E

Comments to the Draft 2022 Groundwater Sustainability Plan and Responses

Response to Comments Summary and Master Responses to
Public Review Draft of the Wyandotte Creek Subbasin Groundwater Sustainability Plan
Released September 2021

Overview

The Wyandotte Creek Groundwater Sustainability Agency (GSA) in the Wyandotte Creek Subbasin would like to thank the public, partner agencies, and interested parties for their participation in the development of the Wyandotte Creek Subbasin Groundwater Sustainability Plan (GSP). During the public review period, a total of three entities and two individuals submitted comment letters on the draft GSP. In addition, members of the public also submitted comments using the comment tracking sheet format. Each of these comments are included in this Appendix in a comment tracking table that also includes a response from the GSA. Comment letters and associated attachments are included following the comment tracking table.

Submitted public comments describe a variety of topics, some of which have been incorporated into the GSP. The GSA acknowledges that the GSP is a living-breathing document and subject to revision and update in the future as data gaps are filled, projects and management actions (PMAs) are refined and completed, resource management responds to changing conditions, and to continue compliance with SGMA.

The specified Measurable Objectives (MOs) and Minimum Thresholds (MTs) (and resulting definitions of Undesirable Results) were developed through an iterative process with GSA, technical consultant, and the Wyandotte Creek Advisory Committee (WAC) using best available information. They are based on local input and a balance of local concerns. Over the last two years, discussions were held during the WAC meetings, at public workshops, and by the GSA board throughout GSP development. Protection of domestic wells, and those within the subbasin who are dependent on them (including Disadvantaged Communities), was an important criteria for establishing MTs for groundwater levels. Although the Wyandotte Creek Subbasin benefits from the historical Butte Basin Groundwater Model, additional data is needed to understand and analyze impacts to beneficial uses and users regarding interconnected surface waters and Groundwater Dependent Ecosystems (GDEs). This was identified as a data gap. An Interconnected Surface Water Sustainable Management Criteria (SMC) framework has been developed for the GSP, as described in Section 3.8. This framework will guide future data collection efforts to fill data gaps, either as part of GSP projects and management actions or as plan implementation. Understanding how the subbasin condition effects these uses and users of groundwater is expected to improve through new information as GSP implementation proceeds. The SMCs may be modified in future versions of the GSP.

Several comment topics from the received public comments/comment letters are addressed in the Master Responses, further below, which are referred to in the individual responses to comments in the comment tracking table.

Commenters seeking further clarification of issues or questions raised in individual comments or by agency letters are encouraged to address them with the Wyandotte Creek GSA Management Committee.

The GSA will continue to seek to foster participation and partnerships with the public, NGOs, agencies, and interested parties as the GSP is implemented.

Public Review Period

The Draft Wyandotte Creek GSP was released for a 45-day public review period beginning on September 9, 2021 and ending October 24, 2021. As part of the public review process, the Wyandotte Creek GSA held a public workshop that allowed for both in-person and virtual/Zoom attendance on October 20, 2021. The purpose of the Workshop was to present and discuss each of the Chapters of the GSP, address clarifying questions, and provide comments to the Wyandotte Creek Management Committee and Geosyntec (consultant team) pertaining to the GSP. In addition, the Wyandotte Creek GSA Advisory Committee (WAC) met on November 4, 2021 to 1) review comments received on the GSP during the public review period as well as during the public workshop and 2) to make any recommendations to the GSA Board regarding any changes, additions, or points of clarification for incorporation into the GSP, as appropriate, prior to finalizing the document for adoption by the Wyandotte Creek GSA Board. The GSA Board heard additional comments and considered final revisions during the Public Hearing of the GSP on November 18, 2021.

Comments Received / Comment Tracking Table

The comment tracking table identifies all of the comments received during the 45-day public comment period. The Comment Tracking Table tabulates email comments, letters received from agencies and organizations, and comments made during the public workshop. There were three email letters (labeled PC1 through PC3) and three agency/organization comment letters (labeled A1 through A3). These agencies/organizations include:

1. Audubon California, Clean Water Action, Clean Water Fund, Local Government Commission, The Nature Conservancy, American Rivers and Union of Concerned Scientists.
2. California Department of Fish and Wildlife (CDFW)
3. Audubon California

The comment letters are cross-referenced in the table and included in their entirety as an attachment to the comment tracking table.

The Wyandotte Creek GSA Management Committee in coordination with the consultant team reviewed all comments received and responded accordingly. Comments that resulted in edits, additions, or deletions to the GSP were documented in tracked changes for ease of review by the GSA Board prior to adoption. These revisions are also noted in the comment tracking table.

Master Responses

Master Response – Measurable Objectives and Minimum Thresholds (MO/MT)

Comments express concern that the MT and MO are set too low and do not sufficiently consider beneficial uses and users of groundwater such as domestic well owners, groundwater dependent ecosystems, and stream flows.

The specified Measurable Objectives (MOs) and Minimum Thresholds (MTs) (and resulting definitions of Undesirable Results) were developed through an iterative process with GSAs and local stakeholders and using best available information. The MO and MT are based on local input and a balance of local concerns. Over the past year, discussions were held during Wyandotte Creek Advisory Committee meetings, at public workshops, and by the GSA Board throughout GSP development. Protection of domestic wells, and those within the subbasin who are dependent on them (including Disadvantaged Communities), was an important criteria for establishing MTs for groundwater levels. However, the GSP acknowledges the dataset used for the assessment is limited and likely includes wells no longer in use or poorly maintained. The Community Monitoring Program, described in Section 5.4.3, would improve the data available to refine or modify the MT over the implementation period, as appropriate. Understanding subbasin condition effects on all uses and users of groundwater is expected to improve through new information as GSP implementation proceeds. As a result, Sustainable Management Criteria (SMC) may be modified in future versions of the GSP.

The proposed MTs for groundwater elevation do not necessarily protect all domestic wells because it is impractical to manage a groundwater basin in a manner that fully protects the shallowest wells. However, the GSP describes a management action, Domestic Well Mitigation (Section 5.3.2), that describes a number of steps the GSAs would take to mitigate impacts if an increasing number of domestic wells go dry in the Wyandotte Creek subbasin. In addition, Expansion of Water Purveyor's Service Areas (5.3.5) may also be an important implementation project for increasing reliability of drinking water supplies where practicable and appropriate. The GSA will consider these and all projects and management actions listed in the GSP to meet the sustainability goal of the subbasin.

Comments express concern that the MT is set too low, "below the 80 foot maximum rooting depth of Valley Oaks" and therefore do not sufficiently consider groundwater dependent ecosystems (GDEs). It is important to note the RMS wells were selected to be representative of domestic wells and the GSP identifies a data gap related to the lack of shallow groundwater monitoring that is needed to characterize the water table (depth to first groundwater). This shallow monitoring data is needed to evaluate groundwater conditions in relation to rooting depths and GDEs. The GSP describes a framework (Section 3.8.2) to address this data gap which has application both to characterizing interconnected surface water and GDEs throughout the Wyandotte Creek Subbasin. For additional details, see GDE Master Response.

Comments also express concern that the MO for groundwater levels is set too low and not in line with current conditions. The methodology for establishing the MO is described in Section 3.3.3 and was considered through extensive public dialogue via Wyandotte Creek Advisory Committee meetings, public workshops, and discussions by the GSA Board since at least February 2021.

The GSAs acknowledge that the SMC are subject to revision and update in the future as data gaps are filled, projects and management actions (PMAs) are refined and completed, and implementation of the GSP responds to changing conditions.

Master Response – Groundwater Dependent Ecosystems (GDE)

Comments discussed the benefits of protecting Groundwater Dependent Ecosystems (GDEs), the analysis process for identifying GDEs, and potential impacts to GDEs associated with changing groundwater levels.

Groundwater Dependent Ecosystems are defined in the SGMA regulations as “ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface.” The GSP acknowledges that GDEs exist within the Subbasin largely where vegetation accesses shallow groundwater for survival; and in areas with streams and creeks where a connection to groundwater exists. The extent of where these conditions occur is largely unknown in the Wyandotte Creek subbasin at this time due to the lack of shallow groundwater monitoring to characterize water table conditions. To address this, a framework is described in the GSP in Section 3.8.2 and a Project (5.4.4) to obtain the needed data identified in the framework to monitor and characterize groundwater conditions in relation to beneficial uses and users of groundwater, including GDEs. This will be an important activity of early GSP implementation.

A distinction between an ecosystem’s dependence on groundwater versus its dependence on surface water and the associated riparian zone or floodplain is important and not well understood in the Wyandotte Creek subbasin at this time. The Wyandotte Creek Subbasin acknowledges that overall function of the riparian zone and floodplain is dependent on multiple components of the hydrologic cycle that may or may not have relationships to groundwater levels in the principal aquifer and may or may not be impacted by pumping in the subbasin. For example, hydrologic impacts outside of the Wyandotte Creek Subbasin, such as upper watershed development or fire-related changes in run-off, could result in impacts to streamflow, riparian areas, or GDEs that are completely independent of any connection to groundwater use or groundwater conditions within the Wyandotte Creek Subbasin.

The subbasin does not have a sufficient amount of wells at differing appropriate distances from surface waters (with streamflow monitoring devices already installed on them) with differing depths to be able to sufficiently characterize the spatial or temporal conditions relating to how surface water and groundwater in this subbasin are connected, nor the impacts of groundwater use on potential GDEs. This lack of monitoring wells is identified in the GSP as a data gap. The RMS wells in the subbasin which are used to monitor groundwater levels are not indicative of shallow groundwater (i.e.. water table) conditions, as the majority of them have a total depth of over 160’ deep, or are not screened at depths, which when monitored would allow for an accurate assessment of water table elevations to provide a way to monitor impacts to GDEs. For this reason Representative Monitoring Site wells are not evaluated in relation to potential GDEs. As discussed in Section 4.10 sufficient data is lacking at this time to analyze the interaction of streams and pumping within the principle aquifer system. These data are not available and are identified as a data gap for the GSP with a clear plan on how it will be addressed. The GSAs in the Wyandotte Creek Subbasin intend to further evaluate the groundwater level and interconnected surface water SMC to avoid undesirable results to aquatic ecosystems and GDEs. Additional wells and other monitoring networks will be installed, as appropriate, following the framework discussed in Section 3.8.

As additional data are collected and evaluated, the Wyandotte Creek Subbasin GSAs will evaluate the development or refinement of additional SMC, as appropriate, for specific stream reaches and associated habitat where priority GDEs are identified, where there is a clear connection to groundwater pumping in the principal aquifer.

The GSAs will focus on connectivity where there is a measurable connection between groundwater levels in the principal aquifer and streamflow or associated aquatic habitat viability. The Wyandotte Creek Subbasin specifically recognizes deep-rooted tree species, such as Valley Oak, that are common along

riparian corridors in both upland streams and the Sacramento River. This connectivity is not well measured or understood in the Wyandotte Creek Subbasin at this time. As these conditions are better understood the GSAs will determine if GDEs are being adversely impacted by groundwater management and adjust management actions accordingly. In the interim, an undesirable result defined for interconnected surface waters is defined as:

> *Depletion of surface water flows caused by groundwater pumping significantly and unreasonably impacts beneficial uses of surface water.*

The SMC developed for groundwater levels are used as a proxy for interconnected surface water in an interim manner until data gaps are addressed. As outlined in Section 6, an aggressive schedule has been provided to fill these data gaps and the GSAs are committed to addressing these issues and will refine and develop appropriate SMCs for the Wyandotte Creek Subbasin through implementation of the GSP.

Additionally, it is important to note that SGMA does not require GSAs to identify species present in GDEs. The NCCAG dataset provides the dominant species per polygon and can be referenced online. The approach to the initial analyses of GDEs was developed through discussions with staff of The Nature Conservancy, a locally formed GDE working group, County staff, GSA managers and staff from other subbasins in the region. As additional data are collected and evaluated, the Wyandotte Creek Subbasin GSAs will evaluate the development of additional criteria for identifying GDEs including but not limited to comparing water depths in representative monitoring sites to the rooting depths of nearby potential GDE communities. These and other updates will be provided in the periodic evaluations of the GSP provided to the Department of Water Resources.

Master Response – Interconnected Surface Waters (ISW)

Comments expressed concern regarding lack of consideration of stream-groundwater interactions and impacts of groundwater extractions on stream depletions and associated beneficial uses and users in development of Sustainable Management Criteria (SMC) for this sustainability indicator.

Section 4.10 describes a significant data gap discussed earlier in Section 3.8 as it pertains to development of Sustainable Management Criteria (SMC) for Interconnected Surface Water (ISW):

> *There is a lack of sufficient data to analyze interaction of streams and pumping within the primary aquifer system. Additional wells and other monitoring networks will be installed, as appropriate, following the framework discussed in Section 3.8*

The GSP acknowledges additional data is needed to characterize the relationship between shallow groundwater conditions, groundwater pumping, and surface water depletions to evaluate impacts to environmental users, such as listed aquatic species, river flows and timing, or water temperatures. The Plan demonstrates a thorough understanding of where data gaps exist and demonstrates a commitment to eliminate those data gaps. In particular, increasing monitoring in shallow aquifer zones will lead to a better overall understanding of the dynamics and impacts of depletions of interconnected surface water.

Section 3.8.2 describes an “ISW SMC Framework” that outlines the specific data needs required to address the identified data gap. Section 5.4.4 describes a data collection project to address this data gap as the GSP is implemented. The GSA intends to seek grant funds and/or Technical Support Services

to install additional monitoring wells and may partner with neighboring subbasins to address shared data gaps and monitoring needs.

The GSP was developed with best available data and tools. Identified data gaps as they relate to ISW will be addressed during the implementation phase of the GSP, and the Wyandotte Creek GSA Board recognizes that SMC may need to be revisited as data gaps are filled and improved information is available. Understanding stream-groundwater interactions in the Wyandotte Creek Subbasin is expected to improve through new information as GSP implementation proceeds.

Groundwater Sustainability Plan
Public Review Draft- September 9 to October 24, 2021
Comment Tracking Table

References are made throughout the Comment Tracking Table to various Master Responses included in the Responses to Comments Summary and Master Responses memo. Provided below is a list of the Master Responses and a key to the Master Response abbreviations:

- Groundwater Dependent Ecosystems Master Response, GDE Master Response
- Measurable Objectives/Minimum Thresholds Master Response, MO/MT Master Response
- Interconnected Surface Waters Master Response, ISW Master Response

Written Comments			
#	Commenter Name	Comment	Response
1	Ngodoo Atume, Water Policy Analyst, Clean Water Action/Clean Water Fund	See Wyandotte Creek GSA DRAFT GSP Comment A1 1. Beneficial uses and users are not sufficiently considered in GSP development (DACs, tribes, Domestic well information) nor are the indirect impacts on them described or analyzed sufficiently. 2. Interconnected Surface Waters - lack of supporting information provided for the ISW analysis, lack of clarity regarding which stream segments are retained as ISWs or potential ISWs in the GSP. 3. GDE – lack of analysis of groundwater data to verify the NC dataset polygons, some incorrectly removed in areas adjacent to irrigated fields or due to the presence of surface water supplies, lack of discussion regarding the flora or fauna species present in potential GDEs. 4. Water Budget - clarification needed for data used to estimate demands of managed wetlands 5. Stakeholder Engagement – A description of the active and targeted outreach to engage DAC members, drinking water users, environmental stakeholders and consultation to tribes during all phases of the GSP process is lacking. 6. Water Quality - Comments expressed the opinion that Water Quality MTs should address other constituents, rather than just electrical conductivity and discuss impacts on beneficial users. 7. Potential impacts on environmental beneficial uses and users, GDEs and instream habitats from the MOs/MTs need to be considered when defining undesirable results. 8. Climate change is not sufficiently considered. 9. Data gaps are not sufficiently identified and the GSP does not have a plan to eliminate them. 10. Projects and Management Actions do not sufficiently consider potential impacts or benefits to beneficial uses and users.	1. Thank you for these recommendations, a map of tribal lands and a map showing domestic well depths have been added to the GSP. Additional suggestions will be considered in future revisions or updates of the GSP. 2. Please see Interconnected Surface Waters Master Response. 3. Please see GDE Master Response. 4. The Butte Basin Groundwater Model (BBGM) documentation has been updated as part of the GSP development effort and is now available. It describes assumptions affecting water demand estimates of managed wetlands in greater detail than previous documentation. The BBGM model documentation is included as a reference document of the GSP. If corrections or refinements are needed to model inputs, these can be addressed through model updates which are a planned activity of GSP implementation. 5. Thank you for your comment, Additional refinements will be considered in future revisions or updates of the GSP. 6. Thank you for your comment, Additional refinements will be considered in future revisions or updates of the GSP. 7. The GSP is not intended to address all groundwater quality conditions in the Subbasin; rather it sets a baseline to assess whether future actions taken by the GSAs may impact groundwater quality. Thank you for the additional specific recommendations regarding consideration of beneficial uses and users. The GSA Board will consider these recommendations as the GSP is implemented and as updates to the GSP are made in the future. 8. Please see the MO/MT, GDE and Interconnected Surface Waters Master Responses. 9. The GSA Boards will consider these recommendations to the GSP in the future. 10. Thank you for this recommendation. The GSA Board may consider additional updates to the plan in the future.
2	Kevin Thomas, Regional Manager, North Central Region	See Wyandoote Creek GSA DRAFT GSP Comment A2 GDE Comments 1. Potential GDE areas were classified as “Not Likely a GDE” if the areas were located within 150 feet of perennial surface water supplies, 150 feet of rice fields, 50 feet of other irrigated agriculture, or 150 feet of agricultural-dependent surface waters. This GDE-elimination method may disregard a GDE’s adaptability and opportunistic approach to accessing water in which the vegetation may rely on both surface water and groundwater between seasons and years. 2. The GDE analysis also classifies potential GDEs from the NCCAG dataset as “Not Likely a GDE” if the vegetation “did not indicate surviving conditions” over the four drought years reviewed for the analysis. During drought years, it is likely that GDEs were experiencing adverse impacts due to combined groundwater depletion and reduced surface water availability 3. The GSP does not identify or discuss species that may be present within the subbasin that rely on groundwater, groundwater dependent ecosystems, or interconnected surface waters. 4. In discussing potential impacts of groundwater depletions on GDEs or interconnected surface waters, the GSP refers to “deep rooted tree species” (lines 189, 3406, 3698). This phrasing is narrow and excludes consideration of all vegetation types that may be groundwater dependent or supported by interconnected surface waters apart from tree species. 5. In discussing potential impacts of groundwater depletions on GDEs or interconnected surface waters, the GSP refers to “deep rooted tree species” (lines 189, 3406, 3698). This phrasing is narrow and excludes consideration of all vegetation types that may be groundwater dependent or supported by interconnected surface waters apart from tree species.	GDE Comments - See GDE Master Response. SMC Comments – See SMC Master Response Monitoring Network Comments - See GDE Master Response PMA Comments - Thank you for this recommendation. The GSA Board considered revisions to this chapter at the Public Hearing in November 2021. The Board will consider this input as the GSP is implemented and updated in the future. Interconnected Surface Water Data Gap Comments - See ISW Master Response

#	Commenter Name	Comment	Response
2	Kevin Thomas, Regional Manager, North Central Region (continued)	GDE Comments 1. Potential GDE areas were classified as "Not Likely a GDE" if the areas were located within 150 feet of perennial surface water supplies, 150 feet of rice fields, 50 feet of other irrigated agriculture, or 150 feet of agricultural-dependent surface waters. This GDE-elimination method may disregard a GDE's adaptability and opportunistic approach to accessing water in which the vegetation may rely on both surface water and groundwater between seasons and years. 2. The GDE analysis also classifies potential GDEs from the NCCAG dataset as "Not Likely a GDE" if the vegetation "did not indicate surviving conditions" over the four drought years reviewed for the analysis. During drought years, it is likely that GDEs were experiencing adverse impacts due to combined groundwater depletion and reduced surface water availability 3. The GSP does not identify or discuss species that may be present within the subbasin that rely on groundwater, groundwater dependent ecosystems, or interconnected surface waters. 4. In discussing potential impacts of groundwater depletions on GDEs or interconnected surface waters, the GSP refers to "deep rooted tree species" (lines 189, 3406, 3698). This phrasing is narrow and excludes consideration of all vegetation types that may be groundwater dependent or supported by interconnected surface waters apart from tree species. 5. In discussing potential impacts of groundwater depletions on GDEs or interconnected surface waters, the GSP refers to "deep rooted tree species" (lines 189, 3406, 3698). This phrasing is narrow and excludes consideration of all vegetation types that may be groundwater dependent or supported by interconnected surface waters apart from tree species. SMC Comments 1. Use of groundwater levels as a proxy metric for ISW depletions may misinform groundwater management activities and poorly predict instream habitat conditions for fish and wildlife species 2. ISW Framework does not discuss the methods that will be used to identify the number or locations of groundwater monitoring wells or stream gages. 3. Minimum thresholds (MTs) and measurable objectives (MOs) for groundwater levels, and by proxy for depletions of interconnected surface water, are not likely to prevent undesirable results for environmental beneficial uses and users of groundwater and interconnected surface water, including groundwater dependent ecosystems SMC Comments 1. Use of groundwater levels as a proxy metric for ISW depletions may misinform groundwater management activities and poorly predict instream habitat conditions for fish and wildlife species 2. ISW Framework does not discuss the methods that will be used to identify the number or locations of groundwater monitoring wells or stream gages. 3. Minimum thresholds (MTs) and measurable objectives (MOs) for groundwater levels, and by proxy for depletions of interconnected surface water, are not likely to prevent undesirable results for environmental beneficial uses and users of groundwater and interconnected surface water, including groundwater dependent ecosystems. 4. The GSP does not include any discussion or analysis of whether the established SMCs sufficiently avoid identified potential impacts to GDEs or environmental users of interconnected surface waters, and proposed indicators of undesirable results (i.e., SMC) for groundwater levels. Depletions of interconnected surface water effectively do not exist for dry water years. no groundwater management accountability during increasingly prevalent and challenging periods of dryness. 5. The GSP states that for the established SMCs, if observed data "trend toward the locally defined MT, this will trigger action on part of the GSAs." It is unclear over what time period data will need to be collected in order to establish a 'trend' toward the SMCs, and what action will be triggered. Monitoring Network Comments 1. It is unclear whether any of the selected groundwater level monitoring wells are located near areas with likely groundwater dependent ecosystems and if plan implementation will involve comparing water depths in representative monitoring sites to the rooting depths of nearby GDE communities. PMA Comments 1. The GSP should include details on specific metrics, targets, and timelines that if not reached with implementation of the planned PMAs will trigger the implementation of additional PMAs. Interconnected Surface Water Data Gap Comments 1. 1. No discrete time schedule is provided for installation of necessary groundwater wells and stream gages, refinement of the characterization of interconnected surface waters within the subbasin, and updates to the SMCs.	GDE Comments - See GDE Master Response. SMC Comments – See SMC Master Response Monitoring Network Comments - See GDE Master Response PMA Comments - Thank you for this recommendation. The GSA Board considered revisions to this chapter at the Public Hearing in November 2021. The Board will consider this input as the GSP is implemented and updated in the future. Interconnected Surface Water Data Gap Comments - See ISW Master Response

#	Commenter Name	Comment	Response
3	Samantha Arthur, Working Lands Program Director	**Refer to Letter A3.**	Thank you for these recommendations and comments. The comment letter refers to their review of documentation of the Butte Basin Groundwater Model (BBGM) and a lack of detail in the GSP regarding ET rates and acreages for managed wetlands. The BBGM documentation has been updated as part of the GSP development effort and is now available. Some of the details requested by the comment letter are included in this updated report. For the purposes of model scenarios, 2016 is considered a relatively normal year with respect to surface water availability in the subbasin for irrigation supplies (agricultural or managed wetlands). Recommendations related to land use data and characterization of managed wetlands will be considered during GSP implementation and future updates of the BBGM. If corrections or refinements are needed to model inputs, these can be addressed through model updates which are a planned activity of GSP implementation. For the updated model documentation, the commenter is referred to: Butte County Department of Water and Resource Conservation. 2021. Model Documentation v 1.0. Butte Basin Groundwater Model. 30 November. The GSA thanks Audubon for their offer to participate in scoping Flood MAR type projects. The GSA Board will consider their recommendations as the GSP is implemented and as updates to the GSP are made in the future.
4	Tasha Levinson	**Refer to Letter PC1.**	Thank you for these recommendations and comments. A number of revisions based on these comments have been made to the GSP (see tracked changes version for specifics). Additional suggestions will be considered in future revisions or updates to the GSP. Please also refer to MO/MT Master Response.
5	Kathy Brazil	**Refer to Letter PC2 and Attachments**	Thank you for these recommendations and comments. Please refer to the Public Comment Summary Memo which lists a number of master responses pertaining to some of the items raised. Additional suggestions will be considered in future revisions or updates to the GSP.
6	Kathy Brazil	**Refer to Letter PC3.** Here are photos taken of Ruddy Creek at Biggs Ave on 0ct 24 2021 I am sending these as public comment for the next WCGSA committee meeting on Nov 4th. Please add these photos as current data for the draft .As the photos show it is a live groundwater dependent ecosystem that is part of recharging the groundwater in the Wyandotte Groundwater Basin.	Thank you for this recommendation. Additional suggestions will be considered in future revisions or updates of the GSP.
7	Tasha Levinson	California Water Commission hosted a Zoom meeting today (with another tomorrow) about groundwater trading within each basin. A key element for anything workable was that fair and equitable groundwater allocations be made in the Groundwater Sustainability Plan. Such allocations were particularly important to assure that (a) water as a human right, (b) protection for disadvantaged communities, and (c) protection for groundwater dependent ecosystems, ALL are protected. I have attended many of the meetings of each of our sub-basins and, to the best of my knowledge, none of the 3 sub-basins have made any groundwater allocations. If they have not then any plans involving trading or banking are pre-mature until such allocations are made. Thank you to all of you for your attention.	Thank you for your comment. The Wyandotte Creek Subbasin GSP does not include a Groundwater Allocation management action nor does it include projects related to groundwater banking. Recharge projects and surface water supply reliability projects as described in the GSP will be key aspects of GSP implementation and successful sustainable groundwater management in the Wyandotte Creek Subbasin.

GSP Workshops October 20, 2021 - Clarifying Questions – Responded to During Workshop

#	Commenter Name	Comment
1	Kathy Brazil	In the chapter about the budget & value of the water, it seems that the purpose is to provide water and protect it, so that we can use it, but then we get into the value of it, the financial aspect of it. It seems that Thermalito will potentially bring more water use for development. Can you clarify the difference between sustainability and financial interest?
2	Kathy Brazil	The data gaps need to be addressed. Is that contingent on boots on the ground for research to be done?
3	Commenter	Is it falling on each water basin to come up with how to measure the data?
4	Commenter (in person)	As it pertains to interconnectedness to surface water, I know there is a data gap. Collecting data from shallow wells near the water was going to be a good way to collect data. How many years do we have to wait to get there?
5	Kathy Brazil	Interdependent ecosystems of water is my concern. And this is closest to the feather river. I would think it has some influence on the water we have here. Both the FEMA flood plain that runs through Thermalito as well as groundwater. When we are addressing the data gaps, there should be documentation about all of that. Specifically, the environmental aspect of the water. I hear a lot about the wells, but the interdependent ecosystems, the streams and creeks, is a big part as well. What environmental reps and agencies are working on that? Army corps of engineers? Etc.
6	Kathy Brazil	Water is produced by nature. Why is sustainability about how much water can we get from the wells?
7	Kathy (in chat)	Workshops like this need to be announced well in advance to the local colleges: CSU and Butte College specifically to their environmental, sustainability and ag departments, staff and students to create greater participation.
8	Kathy Brazil	I want to talk about invasive species flourishing in the areas where there are groundwater recharge areas. A great portion of this area is considered a disadvantaged community. One idea was to use the sewer, discharge water, as a possible recharge area. If we are talking about sustainability, why are we talking about recharge? Is that because we've already depleted it? Shouldn't we be talking about prevention? We need to get Chico state or Butte college. If these GSA drafts were presented to the Ag department or Environment dept heads, they could share them with the students and then the most modern thinking would be on it. We are looking at reports from the 1980's, so this is important, especially since we are talking about 2040, when the college kids will be 40. It's a skeleton crew. I see the same faces. Maybe the funding can go to outreach.











October 24, 2021

Wyandotte Creek GSA
308 Nelson Avenue
Oroville, CA 95965

Submitted via email: wyandottegsa@gmail.com

Re: Public Comment Letter for Wyandotte Creek Groundwater Subbasin Draft GSP

Dear Christina Buck,

On behalf of the above-listed organizations, we appreciate the opportunity to comment on the Draft Groundwater Sustainability Plan (GSP) for the Wyandotte Creek Groundwater Subbasin being prepared under the Sustainable Groundwater Management Act (SGMA). Our organizations are deeply engaged in and committed to the successful implementation of SGMA because we understand that groundwater is critical for the resilience of California's water portfolio, particularly in light of changing climate. Under the requirements of SGMA, Groundwater Sustainability Agencies (GSAs) must consider the interests of all beneficial uses and users of groundwater, such as domestic well owners, environmental users, surface water users, federal government, California Native American tribes and disadvantaged communities (Water Code 10723.2).

As stakeholder representatives for beneficial users of groundwater, our GSP review focuses on how well disadvantaged communities, drinking water users, tribes, climate change, and the environment were addressed in the GSP. While we appreciate that some basins have consulted us directly via focus groups, workshops, and working groups, we are providing public comment letters to all GSAs as a means to engage in the development of 2022 GSPs across the state. Recognizing that GSPs are complicated and resource intensive to develop, the intention of this letter is to provide constructive stakeholder feedback that can improve the GSP prior to submission to the State.

Based on our review, we have significant concerns regarding the treatment of key beneficial users in the Draft GSP and consider the GSP to be **insufficient** under SGMA. We highlight the following findings:

1. Beneficial uses and users **are not sufficiently** considered in GSP development.
    a. Human Right to Water considerations **are not sufficiently** incorporated.
    b. Public trust resources **are not sufficiently** considered.
    c. Impacts of Minimum Thresholds, Measurable Objectives and Undesirable Results on beneficial uses and users **are not sufficiently** analyzed.

2. Climate change **is not sufficiently** considered.
3. Data gaps **are not sufficiently** identified and the GSP **does not have a plan** to eliminate them.
4. Projects and Management Actions **do not sufficiently consider** potential impacts or benefits to beneficial uses and users.

Our specific comments related to the deficiencies of the Wyandotte Creek Groundwater Subbasin Draft GSP along with recommendations on how to reconcile them, are provided in detail in **Attachment A.**

Please refer to the enclosed list of attachments for additional technical recommendations:

Attachment A	GSP Specific Comments
Attachment B	SGMA Tools to address DAC, drinking water, and environmental beneficial uses and users
Attachment C	Freshwater species located in the basin
Attachment D	The Nature Conservancy's "Identifying GDEs under SGMA: Best Practices for using the NC Dataset"
Attachment E	Maps of representative monitoring sites in relation to key beneficial users

Thank you for fully considering our comments as you finalize your GSP.

Best Regards,

Ngodoo Atume
Water Policy Analyst
Clean Water Action/Clean Water Fund

J. Pablo Ortiz-Partida, Ph.D.
Western States Climate and Water Scientist
Union of Concerned Scientists

Samantha Arthur
Working Lands Program Director
Audubon California

Danielle V. Dolan
Water Program Director
Local Government Commission

E.J. Remson
Senior Project Director, California Water Program
The Nature Conservancy

Melissa M. Rohde
Groundwater Scientist
The Nature Conservancy

Attachment A

Specific Comments on the Wyandotte Creek Groundwater Subbasin Draft Groundwater Sustainability Plan

1. Consideration of Beneficial Uses and Users in GSP development

Consideration of beneficial uses and users in GSP development is contingent upon adequate identification and engagement of the appropriate stakeholders. The (A) identification, (B) engagement, and (C) consideration of disadvantaged communities, drinking water users, tribes,[1] groundwater dependent ecosystems, streams, wetlands, and freshwater species are essential for ensuring the GSP integrates existing state policies on the Human Right to Water and the Public Trust Doctrine.

A. Identification of Key Beneficial Uses and Users

Disadvantaged Communities, Drinking Water Users, and Tribes

The identification of Disadvantaged Communities (DACs), drinking water users, and tribes is **insufficient**. We note the following deficiencies with the identification of these key beneficial users.

- The GSP provides information on DACs, including identification by name and location on a map, but fails to provide the population of each DAC within the subbasin.
- The GSP fails to provide a map of tribal lands within the subbasin.
- While the GSP provides a map of domestic well density in Figure 1-9, the plan does not provide the depth of these wells (such as minimum well depth, average well depth, or depth range) within the subbasin.
- The GSP fails to identify the population dependent on groundwater as their source of drinking water in the subbasin. Specifics are not provided on how much each DAC community relies on a particular water supply (e.g., what percentage is supplied by groundwater).

These missing elements are required for the GSAs to fully understand the specific interests and water demands of these beneficial users, and to support the consideration of beneficial users in the development of sustainable management criteria and selection of projects and management actions.

RECOMMENDATIONS
• Provide the population of each identified DAC. 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).

[1] Our letter provides a review of the identification and consideration of federally recognized tribes (Data source: SGMA Data viewer) within the GSP from non-tribal members and NGOs. Based on the likely incomplete information available to our organizations for this review, we recommend that the GSA utilize the California Department of Water Resources' "Engagement with Tribal Governments" Guidance Document (https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents) to comprehensively address these important beneficial users in their GSP.

- Provide a map of tribal lands within the subbasin.
- Include a map showing domestic well locations and average well depth across the subbasin.

Interconnected Surface Waters

The identification of Interconnected Surface Waters (ISWs) is **insufficient**, due to lack of supporting information provided for the ISW analysis. The GSP describes use of the BBGM (Butte Basin Groundwater Model), however does not present a thorough description of the data used in the model, such as the groundwater level monitoring well data and stream gauge data that were incorporated into the model. Additionally, no description was provided of the temporal (seasonal and interannual) variability of the data used to calibrate the model. This information should be provided in the GSP to support the conclusions presented.

The GSP states (p. 46): *"Based on consideration of the frequency with which stream segments are gaining based on BBGM results and on consideration of the spring depth to groundwater below the estimated streambed depth along each primary stream, it is likely that all streams traversing or bounding the subbasin are connected to the groundwater system."* Figure 2-20 presents a map of stream reaches in the subbasin, showing the percentage of months of either a gaining or losing condition in the subbasin as predicted by the BBGM model. We recommend that the reaches are also labeled as interconnected, so that it is clear that all stream segments are retained as ISWs in the GSP.

RECOMMENDATIONS

- Label stream reaches on Figure 2-20 as interconnected (gaining/losing), to make clear that all stream segments are retained as ISWs in the GSP.
- Further describe the groundwater elevation data and stream flow data used in the BBGM analysis.
- To confirm and illustrate the results of the groundwater modeling, overlay the stream reaches shown on Figure 2-20 with depth-to-groundwater contour maps to illustrate groundwater depths and the groundwater gradient near the stream reaches. Show the location of groundwater wells used in the analysis.
- 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 contours across the landscape. This will provide accurate contours of depth to groundwater along streams and other land surface depressions where GDEs are commonly found.
- Describe data gaps for the ISW analysis in the ISW section, in addition to the discussion in the monitoring network section (4.10 Network Assessment and Improvements).

Groundwater Dependent Ecosystems

The identification of Groundwater Dependent Ecosystems (GDEs) is **insufficient**. The GSP does not discuss how the Natural Communities Commonly Associated with Groundwater dataset (NC dataset) was verified with the use of groundwater data from the shallow aquifer. Without an analysis of groundwater data to verify the NC dataset polygons, it will be difficult or impossible to adequately monitor and manage the subbasin's GDEs throughout GSP implementation.

The GSP took initial steps to identify and map GDEs using the NC dataset and other sources. However, we found that some mapped features in the NC dataset were improperly disregarded. NC dataset polygons were incorrectly removed in areas adjacent to irrigated fields or due to the presence of surface water supplies. However, this removal criteria is flawed since GDEs, in addition to groundwater, can rely on multiple water sources – including shallow groundwater receiving inputs from irrigation return flow from nearby irrigated fields – simultaneously and at different temporal/spatial scales. NC dataset polygons adjacent to irrigated land or surface water supplies can still potentially be reliant on shallow groundwater aquifers, and therefore should not be removed solely based on their proximity to irrigated fields or surface water.

The GSP did not discuss the flora or fauna species present in the subbasin's GDEs, except to acknowledge the presence of Valley oak (*Quercus lobata*) in the subbasin. We commend the GSA for retaining all Valley oak polygons in the NC dataset based on the recognition that they can access groundwater at deeper depths.

RECOMMENDATIONS

- Provide a comprehensive set of maps for the subbasin's GDEs. For example, provide a map of the NC Dataset. On the map, label polygons retained, removed, or added to/from the NC dataset (include the removal reason if polygons are not considered potential GDEs, or include the data source if polygons are added). Discuss how local groundwater data was used to verify whether polygons in the NC Dataset are supported by groundwater in an aquifer. 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.

- 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.

- 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.

- 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. It is not clear from the description in the GSP whether NC dataset polygons labeled as 'Not Likely a GDE' on Figure 2-23 are retained as potential GDEs.

- 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 Wyandotte Creek Subbasin). Note any threatened or endangered species.

Native Vegetation and Managed Wetlands

Native vegetation and managed wetlands are water use sectors that are required to be included in the water budget.[2,3] The integration of these ecosystems into the water budget is **sufficient** because the groundwater demands of native vegetation and managed wetlands are included in the historical, current, and projected water budgets. Additional clarification is needed on the managed wetland acres represented in the basin water budget to ensure all managed wetlands are captured. DWR's Statewide Crop Mapping layer is one spatial dataset that indicates managed wetland extent.

RECOMMENDATION

- Provide documentation of the managed wetland acres and associated evapotranspiration values that are used as inputs in the water budget model (BCDWRC 2021).

B. Engaging Stakeholders

Stakeholder Engagement during GSP development

Stakeholder engagement during GSP development is **insufficient**. SGMA's requirement for public notice and engagement of stakeholders is not fully met by the description in the Communication and Engagement Plan (Appendix 1-C).[4]

The Communication and Engagement Plan documents representation of tribal and environmental interests on the Wyandotte Creek Advisory Committee (WAC). However, we note the following deficiencies with the overall stakeholder engagement process:

- The opportunities for public involvement and engagement with DACs and drinking water users are described in very general terms, including attending GSA Board and public meetings, WAC meetings, public workshops, subbasin-wide Technical Advisory Committee meetings, Farm Bureau Water Forum meetings, City of Oroville meetings, and Regional Water Management Group meetings. No specific outreach targeted to DACs and drinking water users is described in the GSP, nor does the GSP document how feedback from stakeholders was incorporated into the GSP development.

[2] "'Water use sector' refers to categories of water demand based on the general land uses to which the water is applied, including urban, industrial, agricultural, managed wetlands, managed recharge, and native vegetation." [23 CCR §351(al)]

[3] "The water budget shall quantify the following, either through direct measurements or estimates based on data: (3) Outflows from the groundwater system by water use sector, including evapotranspiration, groundwater extraction, groundwater discharge to surface water sources, and subsurface groundwater outflow." [23 CCR §354.18]

[4] "A communication section of the Plan shall include a requirement that the GSP identify how it encourages the active involvement of diverse social, cultural, and economic elements of the population within the basin." [23 CCR §354.10(d)(3)]

- The Communication and Engagement Plan does not include a specific plan with details for continual opportunities for engagement through the *implementation* phase of the GSP for DACs, drinking water users, tribes, and environmental stakeholders.

RECOMMENDATIONS

- In the Communication and Engagement Plan, describe active and targeted outreach to engage DACs, drinking water users, environmental stakeholders and consultation to tribes through 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.

- Utilize DWR's tribal engagement guidance to comprehensively address all tribes and tribal interests in the subbasin within the GSP.[5]

C. Considering Beneficial Uses and Users When Establishing Sustainable Management Criteria and Analyzing Impacts on Beneficial Uses and Users

The consideration of beneficial uses and users when establishing sustainable management criteria (SMC) is **insufficient**. The consideration of potential impacts on all beneficial users of groundwater in the basin are required when defining undesirable results and establishing minimum thresholds.[6,7,8]

Disadvantaged Communities and Drinking Water Users

For chronic lowering of groundwater levels, the GSP discusses minimum threshold impacts on domestic wells (see Section 3.3.2 Minimum Thresholds). The GSP states (p. 88): "*In recent years, Butte County has documented a number of domestic wells that have gone dry, meaning groundwater levels have fallen below the depth of the well installation and/or pump throughout the County. This occurred during summer months of recent drought years and heightened concern among some stakeholders. As a result, domestic well reliability and protection are the focus of the Groundwater Levels MT*."

The plan states that *"the quantitative Wyandotte Creek Subbasin Undesirable Result for the Chronic Lowering of Groundwater Levels occurs when: two RMS wells within a management area reach their MT for two consecutive non-dry year-types."* This information suggests that minimum thresholds reached during dry years or periods of drought will not result in an undesirable result.

The GSP also discusses the use of the DWR domestic well database and sets minimum threshold levels protective of domestic wells by establishing a representative zone for each RMS

[5] Engagement with Tribal Governments Guidance Document. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/Guidance-Doc-for-SGM-Engagement-with-Tribal-Govt_ay_19.pdf

[6] "The description of undesirable results shall include [...] potential effects on the beneficial uses and users of groundwater, on land uses and property interests, and other potential effects that may occur or are occurring from undesirable results." [23 CCR §354.26(b)(3)]

[7] "The description of minimum thresholds shall include [...] how minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property interests." [23 CCR §354.28(b)(4)]

[8] "The description of minimum thresholds shall include [...] how state, federal, or local standards relate to the relevant sustainability indicator. If the minimum threshold differs from other regulatory standards, the agency shall explain the nature of and the basis for the difference." [23 CCR §354.28(b)(5)]

well. The resulting minimum thresholds are protective of 85% of domestic wells. Despite this well impact analysis, the GSP does not sufficiently describe whether minimum thresholds will avoid significant and unreasonable loss of drinking water to domestic well users in those 15% of wells not protected by the MT, and whether the undesirable results are consistent with California's Human Right to Water policy.[9]

The GSP does not, however, sufficiently describe or analyze direct or indirect impacts on DACs, drinking water users or tribes when defining undesirable results, nor does it describe how the existing minimum threshold groundwater levels are consistent with avoiding undesirable results to DACs and tribes in the subbasin.

For degraded water quality, salinity is the only constituent of concern (COC) for which SMC are established in the subbasin. The minimum threshold is set to the upper limit of the Secondary Maximum Contaminant Level (SMCL) for specific conductance based on the state secondary drinking water standards. The GSP states (p. 93): "*Other constituents, as discussed in Section 2.2.4, are managed through existing management and regulatory programs within the Subbasin, such as the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) and the Irrigated Lands Regulatory Program (ILRP), which focus on improving water quality by managing septic and agricultural sources of salinity and nutrients. Additionally, point-source contaminants are managed and regulated through a variety of programs by the Regional Water Quality Control Board (RWQCB), Department of Toxic Substances Control (DTSC), and the U.S. Environmental Protection Agency (EPA).*" However, SMC should be established for all COCs in the subbasin including chemicals of emerging concern (CEC) impacted or exacerbated by groundwater use and/or management, in addition to coordinating with water quality regulatory programs.

The GSP only includes a very general discussion of impacts on drinking water users when defining undesirable results and evaluating the impacts of proposed minimum thresholds for water quality. The GSP does not, however, mention or discuss direct and indirect impacts on DACs or tribes when defining undesirable results for degraded water quality, nor does it evaluate the cumulative or indirect impacts of proposed minimum thresholds on DACs or tribes.

RECOMMENDATIONS

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 including dry years and periods of drought.

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."[10]

- Evaluate the cumulative or indirect impacts of proposed minimum thresholds for degraded water quality on drinking water users, DACs, and tribes.

[9] California Water Code §106.3. Available at: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=WAT&sectionNum=106.3

[10] Guide to Protecting Water Quality under the Sustainable Groundwater Management Act https://d3n8a8pro7vhmx.cloudfront.net/communitywatercenter/pages/293/attachments/original/1559328858/Guide_to_Protecting_Drinking_Water_Quality_Under_the_Sustainable_Groundwater_Management_Act.pdf?1559328858.

- Set minimum thresholds and measurable objectives for all water quality constituents within the subbasin that can be impacted and/or exacerbated as a result of groundwater use or groundwater management. Ensure they align with drinking water standards.[11]

Groundwater Dependent Ecosystems and Interconnected Surface Waters

Sustainable management criteria for chronic lowering of groundwater levels provided in the GSP do not consider potential impacts to environmental beneficial users. The GSP neither describes nor analyzes direct or indirect impacts on environmental users of groundwater when defining undesirable results. This is problematic because without identifying potential impacts to GDEs, minimum thresholds may compromise, or even destroy, these environmental beneficial users. Since GDEs are present in the subbasin, they must be considered when developing SMC for chronic lowering of groundwater levels.

The GSP recognizes a data gap with respect to the interconnected surface water SMC. The GSP states (p. 98): *"The GSA intends to further evaluate this SMC to avoid undesirable results to aquatic ecosystems and GDEs. To that end, an Interconnected Surface Water SMC framework has been developed for the GSP as described below. This framework will guide future data collection efforts to fill data gaps, either as part of GSP projects and management actions or plan implementation."*

While the data gap is being filled, the SMC for depletion of interconnected surface waters are established by proxy using groundwater levels. The GSP states (p. 99): *"Therefore, at this time, Groundwater Levels SMC are used by proxy and the MT for interconnected surface water is the same as for groundwater levels: Two RMS wells within a management area reach their MT for two consecutive non-dry year-types."* However, no analysis or discussion is presented to describe how the SMC will affect GDEs, or the impact of these minimum thresholds on GDEs in the subbasin. Furthermore, the GSP makes no attempt to evaluate the impacts of the proposed minimum threshold on environmental beneficial users of surface water. The GSP does not explain how the chosen minimum thresholds and measurable objectives avoid significant and unreasonable effects on surface water beneficial users in the subbasin, such as increased mortality and inability to perform key life processes (e.g., reproduction, migration).

RECOMMENDATIONS

- 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 to 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

[11] "Degraded Water Quality [...] collect sufficient spatial and temporal data from each applicable principal aquifer to determine groundwater quality trends for water quality indicators, as determined by the Agency, to address known water quality issues." [23 CCR §354.34(c)(4)]

the subbasin.[12] Defining undesirable results is the crucial first step before the minimum thresholds can be determined.[13]

- When establishing SMC for the subbasin, consider that the SGMA statute [Water Code §10727.4(l)] specifically calls out that GSPs shall include "impacts on groundwater dependent ecosystems".

- 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.[14] The GSP should confirm that minimum thresholds for ISWs avoid adverse impacts to 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.[6,15]

2. Climate Change

The SGMA statute identifies climate change as a significant threat to groundwater resources and one that must be examined and incorporated in the GSPs. The GSP Regulations require integration of climate change into the projected water budget to ensure that projects and management actions sufficiently account for the range of potential climate futures.[16] The effects of climate change will intensify the impacts of water stress on GDEs, making available shallow groundwater resources especially critical to their survival. Condon *et al.* (2020) shows that GDEs are more likely to succumb to water stress and rely more on groundwater during times of drought.[17] When shallow groundwater is unavailable, riparian forests can die off and key life processes (e.g., migration and spawning) for aquatic organisms, such as steelhead, can be impeded.

The integration of climate change into the projected water budget is **insufficient**. The GSP incorporates climate change into the projected water budget using DWR change factors for 2030 and 2070. However, the plan does not consider multiple climate scenarios (e.g., the 2070 extremely wet and extremely dry climate scenarios) in the projected water budget. The GSP should clearly and transparently incorporate the extremely wet and dry scenarios provided by DWR into projected water budgets or select more appropriate extreme scenarios for the subbasin. While these extreme scenarios may have a lower

[12] "The description of undesirable results shall include [...] potential effects on the beneficial uses and users of groundwater, on land uses and property interests, and other potential effects that may occur or are occurring from undesirable results". [23 CCR §354.26(b)(3)]
[13] The description of minimum thresholds shall include [...] how minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property interests." [23 CCR §354.28(b)(4)]
[14] "The minimum threshold for depletions of interconnected surface water shall be the rate or volume of surface water depletions caused by groundwater use that has adverse impacts on beneficial uses of the surface water and may lead to undesirable results." [23 CCR §354.28(c)(6)]
[15] Rohde MM, Seapy B, Rogers R, Castañeda X, editors. 2019. Critical Species LookBook: A compendium of California's threatened and endangered species for sustainable groundwater management. The Nature Conservancy, San Francisco, California. Available at: https://groundwaterresourcehub.org/public/uploads/pdfs/Critical_Species_LookBook_91819.pdf
[16] "Each Plan shall rely on the best available information and best available science to quantify the water budget for the basin in order to provide an understanding of historical and projected hydrology, water demand, water supply, land use, population, climate change, sea level rise, groundwater and surface water interaction, and subsurface groundwater flow." [23 CCR §354.18(e)]
[17] Condon et al. 2020. Evapotranspiration depletes groundwater under warming over the contiguous United States. Nature Communications. Available at: https://www.nature.com/articles/s41467-020-14688-0

likelihood of occurring, their consequences could be significant and their inclusion can help identify important vulnerabilities in the basin's approach to groundwater management.

The GSP incorporates climate change into key inputs (e.g., precipitation and evapotranspiration) of the projected water budget. However, imported water should be adjusted for climate change and clearly incorporated into the surface water flow inputs of the projected water budget. Furthermore, the GSP does not provide a sustainable yield based on the projected water budget with climate change incorporated. If the water budgets are incomplete, including the omission of projected climate change effects on imported water inputs, and sustainable yield is not calculated based on climate change projections, then there is increased uncertainty in virtually every subsequent calculation used to plan for projects, derive measurable objectives, and set minimum thresholds. Plans that do not adequately include climate change projections may underestimate future impacts on vulnerable beneficial users of groundwater such as ecosystems and domestic well owners.

RECOMMENDATIONS

- 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.
- Incorporate climate change into surface water flow inputs, including imported water, for the projected water budget.
- Estimate sustainable yield based on the projected water budget with climate change incorporated.
- Incorporate climate change scenarios into projects and management actions.

3. Data Gaps

The consideration of beneficial users when establishing monitoring networks is **insufficient**, due to lack of specific plans to increase the Representative Monitoring Sites (RMSs) in the monitoring network that represent water quality conditions and shallow groundwater elevations around DACs, domestic wells, tribes, GDEs, and ISWs in the subbasin.

Figure 4-5 (Groundwater Level RMS Wells) and Figure 4-6 (Water Quality RMS Wells) show that no monitoring wells are located across portions of the subbasin near DACs, domestic wells, and tribes (see maps we've provided in Attachment E). Beneficial users of groundwater may remain unprotected by the GSP without adequate monitoring and identification of data gaps in the shallow aquifer. The Plan therefore fails to meet SGMA's requirements for the monitoring network.[18]

The GSP provides some discussion of data gaps for GDEs and ISWs in Sections 4.10 (Network Assessment and Improvements) and Section 6.1.3 (Data Analysis), however, does not provide specific plans, such as locations or a timeline, to fill the data gaps.

[18] "The monitoring network objectives shall be implemented to accomplish the following: [...] (2) Monitor impacts to the beneficial uses or users of groundwater." [23 CCR §354.34(b)(2)]

RECOMMENDATIONS

- 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.
- Increase the number of RMSs 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 RMSs.
- Describe biological monitoring that can be used to assess the potential for significant and unreasonable impacts to GDEs or ISWs due to groundwater conditions in the subbasin.

4. Addressing Beneficial Users in Projects and Management Actions

The consideration of beneficial users when developing projects and management actions is **insufficient** due to the failure to completely identify impacts to water quality from projects and management actions. Additionally, the proposed recharge projects, such as Flood MAR (Section 5.3.4), do not list explicit benefits to DACs within the subbasin. Potential project and management actions may not protect beneficial users. Groundwater sustainability under SGMA is defined not just by sustainable yield, but by the avoidance of undesirable results for *all* beneficial users.

We commend the GSA for including projects and management actions with explicit benefits to the environment (e.g., Oroville Wildlife Area Robinson's Riffle Project, Streamflow Augmentation, Removal of Invasive Species). We also commend the GSA for including the domestic well mitigation program described in Section 5.3.2, with stated priority for disadvantaged communities who are dependent on groundwater.

RECOMMENDATIONS

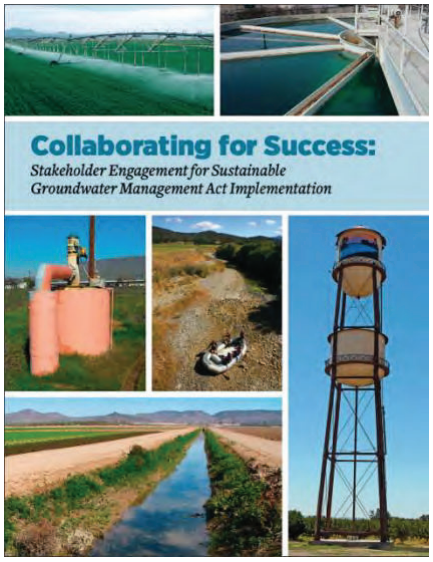
- For DACs and domestic well owners, include a discussion of whether potential impacts to water quality from projects and management actions could occur and how the GSA plans to mitigate such impacts.
- The GSP discusses recharge projects in Section 5.2.4 (Planned Projects). Note that recharge ponds, 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 further guidance on how to integrate multi-benefit recharge projects into your GSP, refer to the "Multi-Benefit Recharge Project Methodology Guidance Document."[19]
- Develop management actions that incorporate climate and water delivery uncertainties to address future water demand and prevent future undesirable results.

[19] The Nature Conservancy. 2021. Multi-Benefit Recharge Project Methodology for Inclusion in Groundwater Sustainability Plans. Sacramento. Available at: https://groundwaterresourcehub.org/sgma-tools/multi-benefit-recharge-project-methodology-guidance/

Attachment B

SGMA Tools to address DAC, drinking water, and environmental beneficial uses and users

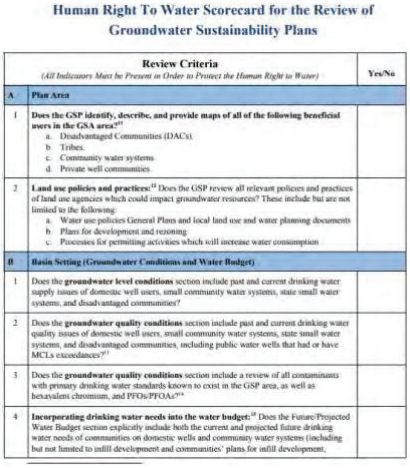
Stakeholder Engagement and Outreach



Clean Water Action, Community Water Center and Union of Concerned Scientists developed a guidance document called Collaborating for success: Stakeholder engagement for Sustainable Groundwater Management Act Implementation. It provides details on how to conduct targeted and broad outreach and engagement during Groundwater Sustainability Plan (GSP) development and implementation. Conducting a targeted outreach involves:

- Developing a robust Stakeholder Communication and Engagement plan that includes outreach at frequented locations (schools, farmers markets, religious settings, events) across the plan area to increase the involvement and participation of disadvantaged communities, drinking water users and the environmental stakeholders.
- Providing translation services during meetings and technical assistance to enable easy participation for non-English speaking stakeholders.
- GSP should adequately describe the process for requesting input from beneficial users and provide details on how input is incorporated into the GSP.

The Human Right to Water

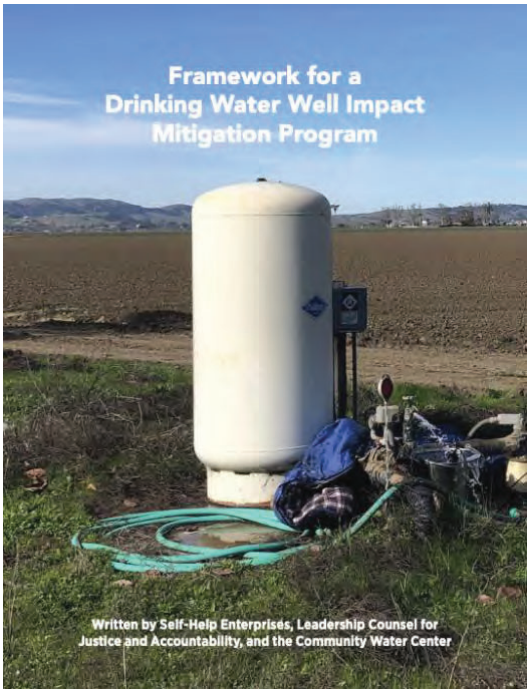


Human Right To Water Scorecard for the Review of Groundwater Sustainability Plans

	Review Criteria *(All Indicators Must be Present in Order to Protect the Human Right to Water)*	Yes/No
A	**Plan Area**	
1	**Does the GSP identify, describe, and provide maps of all of the following beneficial users in the GSA area:**[45] a. Disadvantaged Communities (DACs). b. Tribes. c. Community water systems. d. Private well communities.	
2	**Land use policies and practices:**[46] Does the GSP review all relevant policies and practices of land use agencies which could impact groundwater resources? These include but are not limited to the following: a. Water use policies General Plans and local land use and water planning documents b. Plans for development and rezoning. c. Processes for permitting activities which will increase water consumption	
B	**Basin Setting (Groundwater Conditions and Water Budget)**	
1	Does the **groundwater level conditions** section include past and current drinking water supply issues of domestic well users, small community water systems, state small water systems, and disadvantaged communities?	
2	Does the **groundwater quality conditions** section include past and current drinking water quality issues of domestic well users, small community water systems, state small water systems, and disadvantaged communities, including public water wells that had or have MCLs exceedances?[47]	
3	Does the **groundwater quality conditions** section include a review of all contaminants with primary drinking water standards known to exist in the GSP area, as well as hexavalent chromium, and PFOs/PFOAs?[48]	
4	**Incorporating drinking water needs into the water budget:**[49] Does the Future/Projected Water Budget section explicitly include both the current and projected future drinking water needs of communities on domestic wells and community water systems (including but not limited to infill development and communities' plans for infill development,	

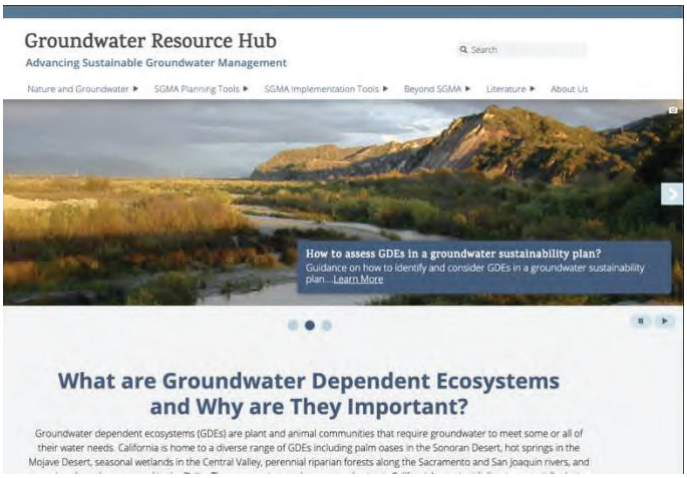
The Human Right to Water Scorecard was developed by Community Water Center, Leadership Counsel for Justice and Accountability and Self Help Enterprises to aid Groundwater Sustainability Agencies (GSAs) in prioritizing drinking water needs in SGMA. The scorecard identifies elements that must exist in GSPs to adequately protect the Human Right to Drinking water.

Drinking Water Well Impact Mitigation Framework



The Drinking Water Well Impact Mitigation Framework was developed by Community Water Center, Leadership Counsel for Justice and Accountability and Self Help Enterprises to aid GSAs in the development and implementation of their GSPs. The framework provides a clear roadmap for how a GSA can best structure its data gathering, monitoring network and management actions to proactively monitor and protect drinking water wells and mitigate impacts should they occur.

Groundwater Resource Hub



The Nature Conservancy has developed a suite of tools based on best available science to help GSAs, consultants, and stakeholders efficiently incorporate nature into GSPs. These tools and resources are available online at GroundwaterResourceHub.org. The Nature Conservancy's tools and resources are intended to reduce costs, shorten timelines, and increase benefits for both people and nature.

Rooting Depth Database



The Plant Rooting Depth Database provides information that can help assess whether groundwater-dependent vegetation are accessing groundwater. Actual rooting depths will depend on the plant species and site-specific conditions, such as soil type and

availability of other water sources. Site-specific knowledge of depth to groundwater combined with rooting depths will help provide an understanding of the potential groundwater levels are needed to sustain GDEs.

How to use the database

The maximum rooting depth information in the Plant Rooting Depth Database is useful when verifying whether vegetation in the Natural Communities Commonly Associated with Groundwater (NC Dataset) are connected to groundwater. A 30 ft depth-to-groundwater threshold, which is based on averaged global rooting depth data for phreatophytes[1], is relevant for most plants identified in the NC Dataset since most plants have a max rooting depth of less than 30 feet. However, it is important to note that deeper thresholds are necessary for other plants that have reported maximum root depths that exceed the averaged 30 feet threshold, such as valley oak (*Quercus lobata*), Euphrates poplar (*Populus euphratica*), salt cedar (*Tamarix spp.*), and shadescale (*Atriplex confertifolia*). The Nature Conservancy advises that the reported max rooting depth for these deeper-rooted plants be used. For example, a depth-to groundwater threshold of 80 feet should be used instead of the 30 ft threshold, when verifying whether valley oak polygons from the NC Dataset are connected to groundwater. It is important to re-emphasize that actual rooting depth data are limited and will depend on the plant species and site-specific conditions such as soil and aquifer types, and availability to other water sources.

The Plant Rooting Depth Database is an Excel workbook composed of four worksheets:

1. California phreatophyte rooting depth data (included in the NC Dataset)
2. Global phreatophyte rooting depth data
3. Metadata
4. References

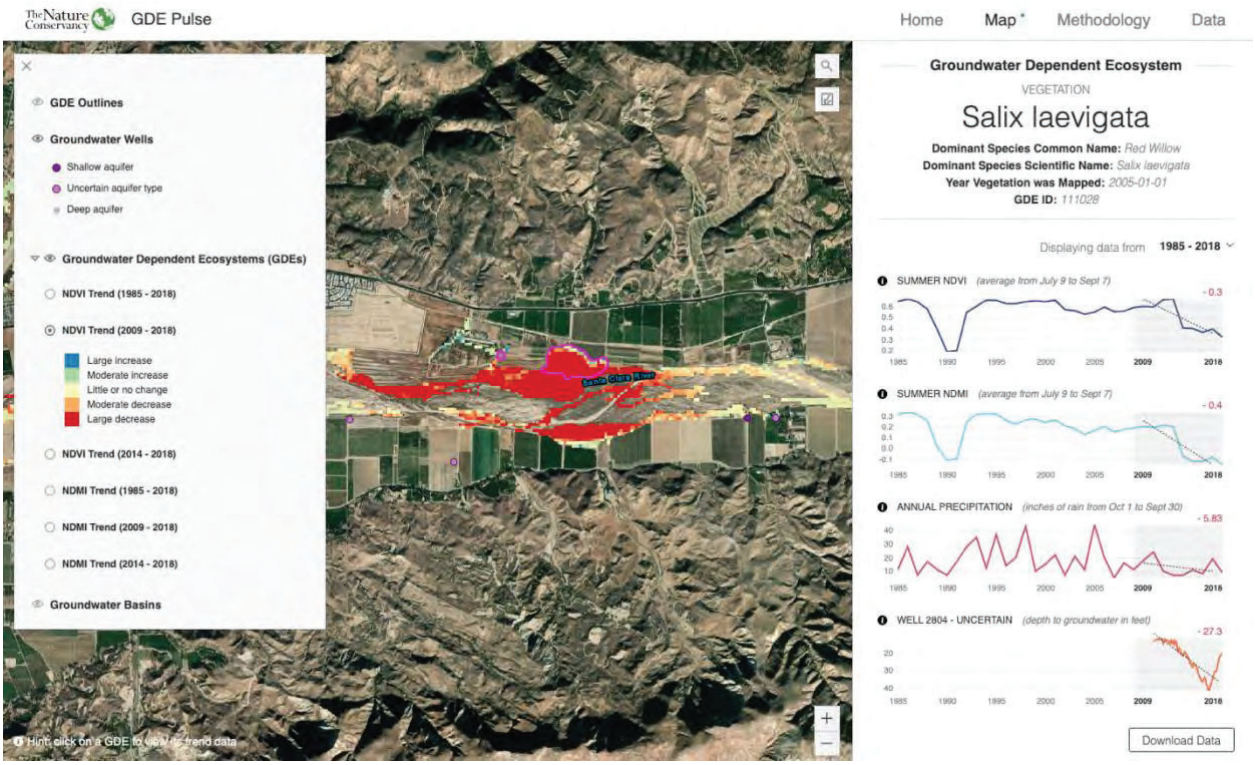
How the database was compiled

The Plant Rooting Depth Database is a compilation of rooting depth information for the groundwater-dependent plant species identified in the NC Dataset. Rooting depth data were compiled from published scientific literature and expert opinion through a crowdsourcing campaign. As more information becomes available, the database of rooting depths will be updated. Please Contact Us if you have additional rooting depth data for California phreatophytes.

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[1] Canadell, J., Jackson, R.B., Ehleringer, J.B. et al. 1996. Maximum rooting depth of vegetation types at the global scale. Oecologia 108, 583–595. https://doi.org/10.1007/BF00329030

GDE Pulse



GDE Pulse is a free online tool that allows Groundwater Sustainability Agencies to assess changes in groundwater dependent ecosystem (GDE) health using satellite, rainfall, and groundwater data. Remote sensing data from satellites has been used to monitor the health of vegetation all over the planet. GDE pulse has compiled 35 years of satellite imagery from NASA's Landsat mission for every polygon in the Natural Communities Commonly Associated with Groundwater Dataset. The following datasets are available for downloading:

Normalized Difference Vegetation Index (NDVI) is a satellite-derived index that represents the greenness of vegetation. Healthy green vegetation tends to have a higher NDVI, while dead leaves have a lower NDVI. We calculated the average NDVI during the driest part of the year (July - Sept) to estimate vegetation health when the plants are most likely dependent on groundwater.

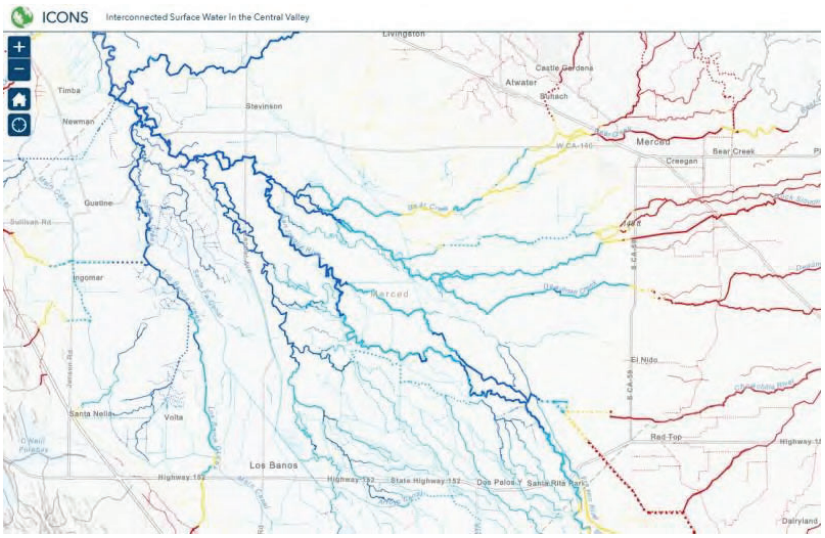
Normalized Difference Moisture Index (NDMI) is a satellite-derived index that represents water content in vegetation. NDMI is derived from the Near-Infrared (NIR) and Short-Wave Infrared (SWIR) channels. Vegetation with adequate access to water tends to have higher NDMI, while vegetation that is water stressed tends to have lower NDMI. We calculated the average NDVI during the driest part of the year (July–September) to estimate vegetation health when the plants are most likely dependent on groundwater.

Annual Precipitation is the total precipitation for the water year (October 1st – September 30th) from the PRISM dataset. The amount of local precipitation can affect vegetation with more precipitation generally leading to higher NDVI and NDMI.

Depth to Groundwater measurements provide an indication of the groundwater levels and changes over time for the surrounding area. We used groundwater well measurements from nearby (<1km) wells to estimate the depth to groundwater below the GDE based on the average elevation of the GDE (using a digital elevation model) minus the measured groundwater surface elevation.

ICONOS Mapper

Interconnected Surface Water in the Central Valley



ICONS maps the likely presence of interconnected surface water (ISW) in the Central Valley using depth to groundwater data. Using data from 2011-2018, the ISW dataset represents the likely connection between surface water and groundwater for rivers and streams in California's Central Valley. It includes information on the mean, maximum, and minimum depth to groundwater for each stream segment over the years with available data, as well as the likely presence of ISW based on the minimum depth to groundwater. The Nature Conservancy developed this database, with guidance and input from expert academics, consultants, and state agencies.

We developed this dataset using groundwater elevation data available online from the California Department of Water Resources (DWR). DWR only provides this data for the Central Valley. For GSAs outside of the valley, who have groundwater well measurements, we recommend following our methods to determine likely ISW in your region. The Nature Conservancy's ISW dataset should be used as a first step in reviewing ISW and should be supplemented with local or more recent groundwater depth data.

Attachment C

Freshwater Species Located in the Wyandotte Creek Subbasin

To assist in identifying the beneficial users of surface water necessary to assess the undesirable result "depletion of interconnected surface waters", Attachment C provides a list of freshwater species located in the Wyandotte Creek Subbasin. To produce the freshwater species list, we used ArcGIS to select features within the California Freshwater Species Database version 2.0.9 within the basin boundary. This database contains information on ~4,000 vertebrates, macroinvertebrates and vascular plants that depend on fresh water for at least one stage of their life cycle. The methods used to compile the California Freshwater Species Database can be found in Howard et al. 2015[1]. The spatial database contains locality observations and/or distribution information from ~400 data sources. The database is housed in the California Department of Fish and Wildlife's BIOS[2] as well as on The Nature Conservancy's science website[3].

Scientific Name	Common Name	Legal Protected Status		
		Federal	State	Other
BIRDS				
Riparia riparia	Bank Swallow		Threatened	
Actitis macularius	Spotted Sandpiper			
Aechmophorus clarkii	Clark's Grebe			
Aechmophorus occidentalis	Western Grebe			
Agelaius tricolor	Tricolored Blackbird	Bird of Conservation Concern	Special Concern	BSSC - First priority
Aix sponsa	Wood Duck			
Anas acuta	Northern Pintail			
Anas americana	American Wigeon			
Anas clypeata	Northern Shoveler			
Anas crecca	Green-winged Teal			
Anas cyanoptera	Cinnamon Teal			
Anas platyrhynchos	Mallard			
Anas strepera	Gadwall			
Anser albifrons	Greater White-fronted Goose			
Ardea alba	Great Egret			
Ardea herodias	Great Blue Heron			
Aythya affinis	Lesser Scaup			
Aythya collaris	Ring-necked Duck			
Aythya marila	Greater Scaup			
Aythya valisineria	Canvasback		Special	
Bucephala albeola	Bufflehead			
Bucephala clangula	Common Goldeneye			

[1] Howard, J.K. et al. 2015. Patterns of Freshwater Species Richness, Endemism, and Vulnerability in California. PLoSONE, 11(7). Available at: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0130710

[2] California Department of Fish and Wildlife BIOS: https://www.wildlife.ca.gov/data/BIOS

[3] Science for Conservation: https://www.scienceforconservation.org/products/california-freshwater-species-database

Butorides virescens	Green Heron			
Calidris mauri	Western Sandpiper			
Calidris minutilla	Least Sandpiper			
Chen caerulescens	Snow Goose			
Cistothorus palustris palustris	Marsh Wren			
Cygnus columbianus	Tundra Swan			
Egretta thula	Snowy Egret			
Empidonax traillii	Willow Flycatcher	Bird of Conservation Concern	Endangered	
Fulica americana	American Coot			
Gallinago delicata	Wilson's Snipe			
Gallinula chloropus	Common Moorhen			
Grus canadensis	Sandhill Crane			
Haliaeetus leucocephalus	Bald Eagle	Bird of Conservation Concern	Endangered	
Icteria virens	Yellow-breasted Chat		Special Concern	BSSC - Third priority
Limnodromus scolopaceus	Long-billed Dowitcher			
Lophodytes cucullatus	Hooded Merganser			
Megaceryle alcyon	Belted Kingfisher			
Mergus merganser	Common Merganser			
Nycticorax nycticorax	Black-crowned Night-Heron			
Oxyura jamaicensis	Ruddy Duck			
Pelecanus erythrorhynchos	American White Pelican		Special Concern	BSSC - First priority
Phalacrocorax auritus	Double-crested Cormorant			
Plegadis chihi	White-faced Ibis		Watch list	
Podiceps nigricollis	Eared Grebe			
Podilymbus podiceps	Pied-billed Grebe			
Porzana carolina	Sora			
Rallus limicola	Virginia Rail			
Setophaga petechia	Yellow Warbler			BSSC - Second priority
Tachycineta bicolor	Tree Swallow			
Tringa melanoleuca	Greater Yellowlegs			
CRUSTACEANS				
Branchinecta lynchi	Vernal Pool Fairy Shrimp	Threatened	Special	IUCN - Vulnerable
Lepidurus packardi	Vernal Pool Tadpole Shrimp	Endangered	Special	IUCN - Endangered
Linderiella occidentalis	California Fairy Shrimp		Special	IUCN - Near Threatened
FISH				

Oncorhynchus mykiss irideus	Coastal rainbow trout			Least Concern - Moyle 2013
Acipenser medirostris ssp. 1	Southern green sturgeon	Threatened	Special Concern	Endangered - Moyle 2013
Oncorhynchus mykiss - CV	Central Valley steelhead	Threatened	Special	Vulnerable - Moyle 2013
Oncorhynchus tshawytscha - CV spring	Central Valley spring Chinook salmon	Threatened	Threatened	Vulnerable - Moyle 2013
HERPS				
Actinemys marmorata marmorata	Western Pond Turtle		Special Concern	ARSSC
Anaxyrus boreas boreas	Boreal Toad			
Rana draytonii	California Red-legged Frog	Threatened	Special Concern	ARSSC
Spea hammondii	Western Spadefoot	Under Review in the Candidate or Petition Process	Special Concern	ARSSC
Taricha torosa	Coast Range Newt		Special Concern	ARSSC
Thamnophis gigas	Giant Gartersnake	Threatened	Threatened	
Thamnophis sirtalis sirtalis	Common Gartersnake			
INSECTS & OTHER INVERTS				
Capnia quadrituberosa	Four-knobbed Snowfly			
Argia emma	Emma's Dancer			
Enallagma carunculatum	Tule Bluet			
Enallagma civile	Familiar Bluet			
Enallagma cyathigerum				Not on any status lists
Gyrinus affinis				Not on any status lists
Ischnura cervula	Pacific Forktail			
Ischnura perparva	Western Forktail			
Libellula saturata	Flame Skimmer			
Plathemis lydia	Common Whitetail			
Sympetrum corruptum	Variegated Meadowhawk			
Tramea lacerata	Black Saddlebags			
Zoniagrion exclamationis	Exclamation Damsel			
MAMMALS				
Castor canadensis	American Beaver			Not on any status lists
Lontra canadensis canadensis	North American River Otter			Not on any status lists
Neovison vison	American Mink			Not on any status lists
Ondatra zibethicus	Common Muskrat			Not on any status lists

MOLLUSKS				
Margaritifera falcata	Western Pearlshell		Special	
PLANTS				
Orcuttia tenuis	Slender Orcutt Grass	Threatened	Endangered	CRPR - 1B.1
Alisma triviale	Northern Water-plantain			
Alopecurus carolinianus	Tufted Foxtail			
Alopecurus saccatus	Pacific Foxtail			
Ammannia coccinea	Scarlet Ammannia			
Ammannia robusta	Grand Redstem			
Arundo donax	NA			
Azolla filiculoides	NA			
Bacopa rotundifolia	NA			
Bergia texana	Texas Bergia			
Bolboschoenus glaucus	NA			Not on any status lists
Brodiaea nana				Not on any status lists
Callitriche heterophylla heterophylla	Northern Water-starwort			
Callitriche marginata	Winged Water-starwort			
Callitriche trochlearis	Waste-water Water-starwort			
Carex densa	Dense Sedge			
Carex feta	Green-sheath Sedge			
Carex vulpinoidea	NA			
Ceratophyllum demersum	Common Hornwort			
Cicendia quadrangularis	Oregon Microcala			
Cotula coronopifolia	NA			
Crassula aquatica	Water Pygmyweed			
Cyperus bipartitus	Shining Flatsedge			
Cyperus erythrorhizos	Red-root Flatsedge			
Cyperus flavescens	NA			
Downingia bella	Hoover's Downingia			
Downingia bicornuta	NA			
Downingia ornatissima	NA			
Echinodorus berteroi	Upright Burhead			
Elatine californica	California Waterwort			
Elatine heterandra	Mosquito Waterwort			
Eleocharis acicularis acicularis	Least Spikerush			
Eleocharis acicularis occidentalis				Not on any status lists
Eleocharis atropurpurea	Purple Spikerush			
Eleocharis bella	Delicate Spikerush			
Eleocharis engelmannii engelmannii	Engelmann's Spikerush			Not on any status lists
Eleocharis macrostachya	Creeping Spikerush			

Eleocharis obtusa	Blunt Spikerush			
Eleocharis quadrangulata	NA			
Eleocharis quinqueflora	Few-flower Spikerush			
Eleocharis radicans	Rooted Spikerush			
Epilobium campestre	NA			Not on any status lists
Epilobium cleistogamum	Cleistogamous Spike-primrose			
Eryngium articulatum	Jointed Coyote-thistle			
Euthamia occidentalis	Western Fragrant Goldenrod			
Gratiola ebracteata	Bractless Hedge-hyssop			
Hydrocotyle umbellata	Many-flower Marsh-pennywort			
Isoetes howellii	NA			
Isoetes nuttallii	NA			
Isolepis cernua	Low Bulrush			
Juncus acuminatus	Sharp-fruit Rush			
Juncus articulatus articulatus				Not on any status lists
Juncus diffusissimus	NA			
Juncus effusus pacificus				
Juncus uncialis	Inch-high Rush			
Juncus usitatus	NA			Not on any status lists
Landoltia punctata	NA			Not on any status lists
Lasthenia fremontii	Fremont's Goldfields			
Limnanthes alba alba	White Meadowfoam			
Limnanthes douglasii douglasii	Douglas' Meadowfoam			
Limosella acaulis	Southern Mudwort			
Limosella aquatica	Northern Mudwort			
Lipocarpha micrantha	Dwarf Bulrush			
Ludwigia hexapetala	NA			Not on any status lists
Ludwigia palustris	Marsh Seedbox			
Ludwigia peploides montevidensis	NA			Not on any status lists
Lycopus americanus	American Bugleweed			
Lythrum portula	NA			
Marsilea vestita vestita	NA			Not on any status lists
Mimulus guttatus	Common Large Monkeyflower			
Myosurus minimus	NA			
Myriophyllum aquaticum	NA			
Navarretia leucocephala leucocephala	White-flower Navarretia			

Panicum dichotomiflorum	NA			
Paspalum distichum	Joint Paspalum			
Perideridia kelloggii	Kellogg's Yampah			
Persicaria hydropiper	NA			Not on any status lists
Persicaria hydropiperoides				Not on any status lists
Persicaria lapathifolia				Not on any status lists
Persicaria punctata	NA			Not on any status lists
Pilularia americana	NA			
Plagiobothrys greenei	Greene's Popcorn-flower			
Plagiobothrys leptocladus	Alkali Popcorn-flower			
Plantago elongata elongata	Slender Plantain			
Pogogyne douglasii	NA			
Pogogyne zizyphoroides				Not on any status lists
Psilocarphus brevissimus multiflorus	Delta Woolly Marbles		Special	CRPR - 4.2
Psilocarphus oregonus	Oregon Woolly-heads			
Ranunculus bonariensis	NA			
Ranunculus pusillus pusillus	Pursh's Buttercup			
Ranunculus sceleratus	NA			
Rorippa curvisiliqua curvisiliqua	Curve-pod Yellowcress			
Rotala ramosior	Toothcup			
Sagittaria montevidensis calycina				Not on any status lists
Salix exigua hindsiana				Not on any status lists
Salix gooddingii	Goodding's Willow			
Salix lasiolepis lasiolepis	Arroyo Willow			
Stachys pycnantha	Short-spike Hedge-nettle			
Stuckenia pectinata				Not on any status lists
Typha latifolia	Broadleaf Cattail			
Wolffia borealis	Dotted Watermeal			
Wolffia globosa	Asian Watermeal			
Zizania palustris interior	NA			
Zizania palustris palustris	NA			

Attachment D

The Nature Conservancy

July 2019



IDENTIFYING GDEs UNDER SGMA

Best Practices for using the NC Dataset

The Sustainable Groundwater Management Act (SGMA) requires that groundwater dependent ecosystems (GDEs) be identified in Groundwater Sustainability Plans (GSPs). As a starting point, the Department of Water Resources (DWR) is providing the Natural Communities Commonly Associated with Groundwater Dataset (NC Dataset) online[1] to help Groundwater Sustainability Agencies (GSAs), consultants, and stakeholders identify GDEs within individual groundwater basins. To apply information from the NC Dataset to local areas, GSAs should combine it with the best available science on local hydrology, geology, and groundwater levels to verify whether polygons in the NC dataset are likely supported by groundwater in an aquifer (Figure 1)[2]. This document highlights six best practices for using local groundwater data to confirm whether mapped features in the NC dataset are supported by groundwater.

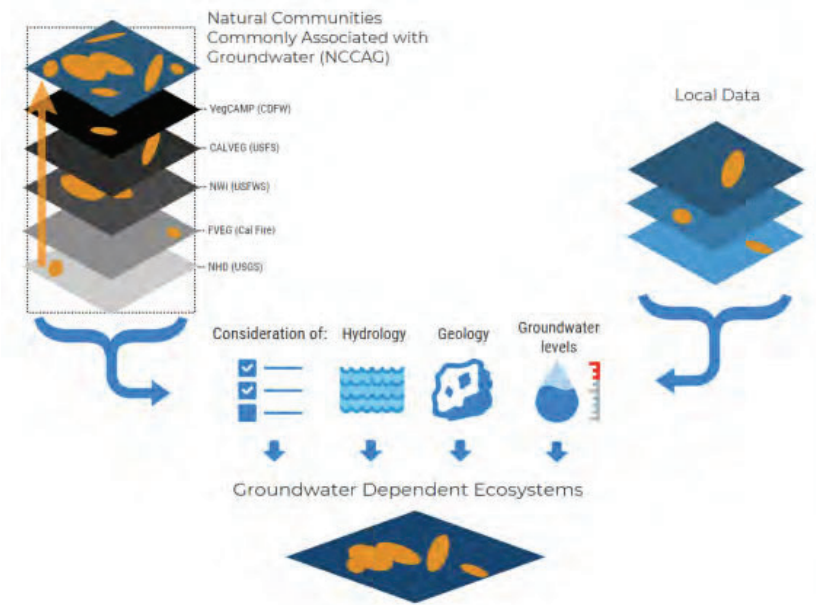


Figure 1. Considerations for GDE identification.
Source: DWR[2]

[1] NC Dataset Online Viewer: https://gis.water.ca.gov/app/NCDatasetViewer/
[2] California Department of Water Resources (DWR). 2018. Summary of the "Natural Communities Commonly Associated with Groundwater" Dataset and Online Web Viewer. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Data-and-Tools/Files/Statewide-Reports/Natural-Communities-Dataset-Summary-Document.pdf

The NC Dataset identifies vegetation and wetland features that are good indicators of a GDE. The dataset is comprised of 48 publicly available state and federal datasets that map vegetation, wetlands, springs, and seeps commonly associated with groundwater in California[3]. It was developed through a collaboration between DWR, the Department of Fish and Wildlife, and The Nature Conservancy (TNC). TNC has also provided detailed guidance on identifying GDEs from the NC dataset[4] on the Groundwater Resource Hub[5], a website dedicated to GDEs.

BEST PRACTICE #1. Establishing a Connection to Groundwater

Groundwater basins can be comprised of one continuous aquifer (Figure 2a) or multiple aquifers stacked on top of each other (Figure 2b). In unconfined aquifers (Figure 2a), using the depth-to-groundwater and the rooting depth of the vegetation is a reasonable method to infer groundwater dependence for GDEs. If groundwater is well below the rooting (and capillary) zone of the plants and any wetland features, the ecosystem is considered disconnected and groundwater management is not likely to affect the ecosystem (Figure 2d). However, it is important to consider local conditions (e.g., soil type, groundwater flow gradients, and aquifer parameters) and to review groundwater depth data from multiple seasons and water year types (wet and dry) because intermittent periods of high groundwater levels can replenish perched clay lenses that serve as the water source for GDEs (Figure 2c). Maintaining these natural groundwater fluctuations are important to sustaining GDE health.

Basins with a stacked series of aquifers (Figure 2b) may have varying levels of pumping across aquifers in the basin, depending on the production capacity or water quality associated with each aquifer. If pumping is concentrated in deeper aquifers, SGMA still requires GSAs to sustainably manage groundwater resources in shallow aquifers, such as perched aquifers, that support springs, surface water, domestic wells, and GDEs (Figure 2). This is because vertical groundwater gradients across aquifers may result in pumping from deeper aquifers to cause adverse impacts onto beneficial users reliant on shallow aquifers or interconnected surface water. The goal of SGMA is to sustainably manage groundwater resources for current and future social, economic, and environmental benefits. While groundwater pumping may not be currently occurring in a shallower aquifer, use of this water may become more appealing and economically viable in future years as pumping restrictions are placed on the deeper production aquifers in the basin to meet the sustainable yield and criteria. Thus, identifying GDEs in the basin should done irrespective to the amount of current pumping occurring in a particular aquifer, so that future impacts on GDEs due to new production can be avoided. A good rule of thumb to follow is: *if groundwater can be pumped from a well - it's an aquifer*.

[3] For more details on the mapping methods, refer to: Klausmeyer, K., J. Howard, T. Keeler-Wolf, K. Davis-Fadtke, R. Hull, A. Lyons. 2018. Mapping Indicators of Groundwater Dependent Ecosystems in California: Methods Report. San Francisco, California. Available at: https://groundwaterresourcehub.org/public/uploads/pdfs/iGDE_data_paper_20180423.pdf
[4] "Groundwater Dependent Ecosystems under the Sustainable Groundwater Management Act: Guidance for Preparing Groundwater Sustainability Plans" is available at: https://groundwaterresourcehub.org/gde-tools/gsp-guidance-document/
[5] The Groundwater Resource Hub: www.GroundwaterResourceHub.org

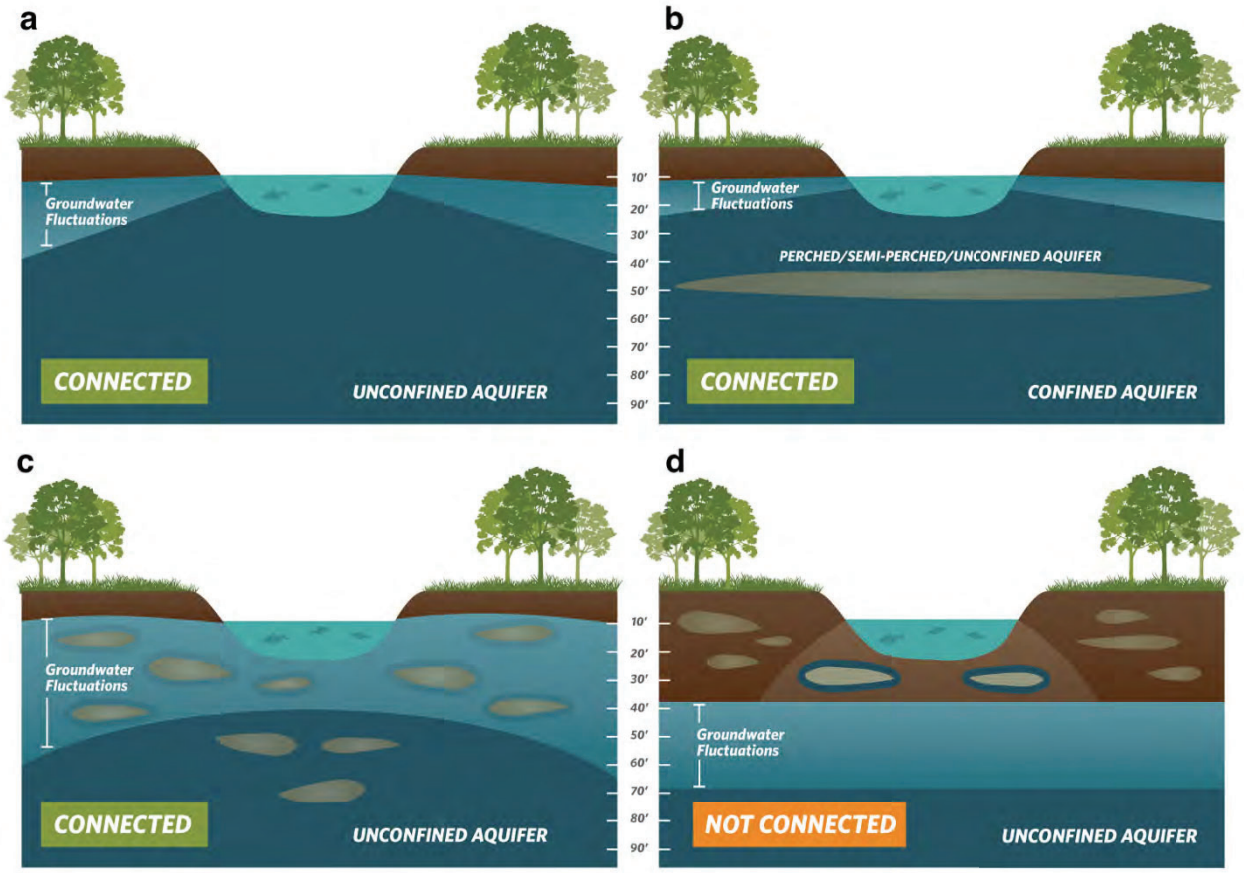


Figure 2. Confirming whether an ecosystem is connected to groundwater. Top: (a) Under the ecosystem is an unconfined aquifer with depth-to-groundwater fluctuating seasonally and interannually within 30 feet from land surface. **(b)** Depth-to-groundwater in the shallow aquifer is connected to overlying ecosystem. Pumping predominately occurs in the confined aquifer, but pumping is possible in the shallow aquifer. **Bottom: (c)** Depth-to-groundwater fluctuations are seasonally and interannually large, however, clay layers in the near surface prolong the ecosystem's connection to groundwater. **(d)** Groundwater is disconnected from surface water, and any water in the vadose (unsaturated) zone is due to direct recharge from precipitation and indirect recharge under the surface water feature. These areas are not connected to groundwater and typically support species that do not require access to groundwater to survive.

BEST PRACTICE #2. Characterize Seasonal and Interannual Groundwater Conditions

SGMA requires GSAs to describe current and historical groundwater conditions when identifying GDEs [23 CCR §354.16(g)]. Relying solely on the SGMA benchmark date (January 1, 2015) or any other single point in time to characterize groundwater conditions (e.g., depth-to-groundwater) is inadequate because managing groundwater conditions with data from one time point fails to capture the seasonal and interannual variability typical of California's climate. DWR's Best Management Practices document on water budgets[6] recommends using 10 years of water supply and water budget information to describe how historical conditions have impacted the operation of the basin within sustainable yield, implying that a baseline[7] could be determined based on data between 2005 and 2015. Using this or a similar time period, depending on data availability, is recommended for determining the depth-to-groundwater.

GDEs depend on groundwater levels being close enough to the land surface to interconnect with surface water systems or plant rooting networks. The most practical approach[8] for a GSA to assess whether polygons in the NC dataset are connected to groundwater is to rely on groundwater elevation data. As detailed in TNC's GDE guidance document[4], one of the key factors to consider when mapping GDEs is to contour depth-to-groundwater in the aquifer that is supporting the ecosystem (see Best Practice #5).

Groundwater levels fluctuate over time and space due to California's Mediterranean climate (dry summers and wet winters), climate change (flood and drought years), and subsurface heterogeneity in the subsurface (Figure 3). Many of California's GDEs have adapted to dealing with intermittent periods of water stress, however if these groundwater conditions are prolonged, adverse impacts to GDEs can result. While depth-to-groundwater levels within 30 feet[4] of the land surface are generally accepted as being a proxy for confirming that polygons in the NC dataset are supported by groundwater, it is highly advised that fluctuations in the groundwater regime be characterized to understand the seasonal and interannual groundwater variability in GDEs. Utilizing groundwater data from one point in time can misrepresent groundwater levels required by GDEs, and inadvertently result in adverse impacts to the GDEs. Time series data on groundwater elevations and depths are available on the SGMA Data Viewer[9]. However, if insufficient data are available to describe groundwater conditions within or near polygons from the NC dataset, include those polygons in the GSP until data gaps are reconciled in the monitoring network (see Best Practice #6).

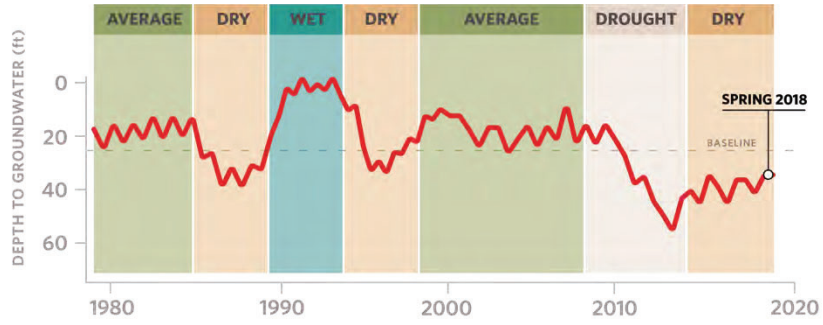


Figure 3. Example seasonality and interannual variability in depth-to-groundwater over time. Selecting one point in time, such as Spring 2018, to characterize groundwater conditions in GDEs fails to capture what groundwater conditions are necessary to maintain the ecosystem status into the future so adverse impacts are avoided.

[6] DWR. 2016. Water Budget Best Management Practice. Available at: https://water.ca.gov/LegacyFiles/groundwater/sgm/pdfs/BMP_Water_Budget_Final_2016-12-23.pdf

[7] Baseline is defined under the GSP regulations as "historic information used to project future conditions for hydrology, water demand, and availability of surface water and to evaluate potential sustainable management practices of a basin." [23 CCR §351(e)]

[8] Groundwater reliance can also be confirmed via stable isotope analysis and geophysical surveys. For more information see The GDE Assessment Toolbox (Appendix IV, GDE Guidance Document for GSPs[4]).

[9] SGMA Data Viewer: https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer

BEST PRACTICE #3. Ecosystems Often Rely on Both Groundwater and Surface Water

GDEs are plants and animals that rely on groundwater for all or some of its water needs, and thus can be supported by multiple water sources. The presence of non-groundwater sources (e.g., surface water, soil moisture in the vadose zone, applied water, treated wastewater effluent, urban stormwater, irrigated return flow) within and around a GDE does not preclude the possibility that it is supported by groundwater, too. SGMA defines GDEs as "ecological communities and species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface" [23 CCR §351(m)]. Hence, depth-to-groundwater data should be used to identify whether NC polygons are supported by groundwater and should be considered GDEs. In addition, SGMA requires that significant and undesirable adverse impacts to beneficial users of surface water be avoided. Beneficial users of surface water include environmental users such as plants or animals[10], which therefore must be considered when developing minimum thresholds for depletions of interconnected surface water.

GSAs are only responsible for impacts to GDEs resulting from groundwater conditions in the basin, so if adverse impacts to GDEs result from the diversion of applied water, treated wastewater, or irrigation return flow away from the GDE, then those impacts will be evaluated by other permitting requirements (e.g., CEQA) and may not be the responsibility of the GSA. However, if adverse impacts occur to the GDE due to changing groundwater conditions resulting from pumping or groundwater management activities, then the GSA would be responsible (Figure 4).

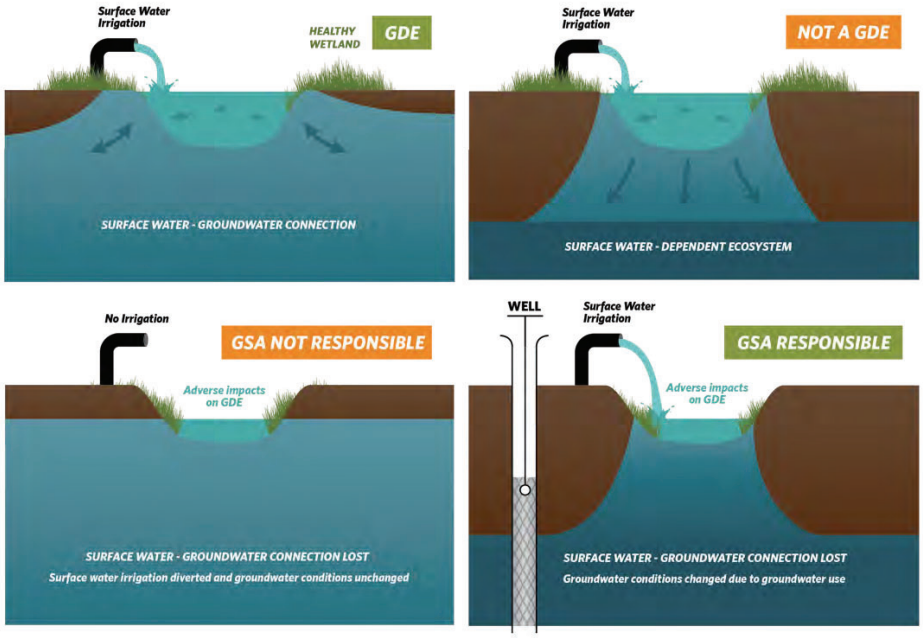


Figure 4. Ecosystems often depend on multiple sources of water. Top: (Left) Surface water and groundwater are interconnected, meaning that the GDE is supported by both groundwater and surface water. **(Right)** Ecosystems that are only reliant on non-groundwater sources are not groundwater-dependent. **Bottom: (Left)** An ecosystem that was once dependent on an interconnected surface water, but loses access to groundwater solely due to surface water diversions may not be the GSA's responsibility. **(Right)** Groundwater dependent ecosystems once dependent on an interconnected surface water system, but loses that access due to groundwater pumping is the GSA's responsibility.

[10] For a list of environmental beneficial users of surface water by basin, visit: https://groundwaterresourcehub.org/gde-tools/environmental-surface-water-beneficiaries/

BEST PRACTICE #4. Select Representative Groundwater Wells

Identifying GDEs in a basin requires that groundwater conditions are characterized to confirm whether polygons in the NC dataset are supported by the underlying aquifer. To do this, proximate groundwater wells should be identified to characterize groundwater conditions (Figure 5). When selecting representative wells, it is particularly important to consider the subsurface heterogeneity around NC polygons, especially near surface water features where groundwater and surface water interactions occur around heterogeneous stratigraphic units or aquitards formed by fluvial deposits. The following selection criteria can help ensure groundwater levels are representative of conditions within the GDE area:

- Choose wells that are within 5 kilometers (3.1 miles) of each NC Dataset polygons because they are more likely to reflect the local conditions relevant to the ecosystem. If there are no wells within 5km of the center of a NC dataset polygon, then there is insufficient information to remove the polygon based on groundwater depth. Instead, it should be retained as a potential GDE until there are sufficient data to determine whether or not the NC Dataset polygon is supported by groundwater.

- Choose wells that are screened within the surficial unconfined aquifer and capable of measuring the true water table.

- Avoid relying on wells that have insufficient information on the screened well depth interval for excluding GDEs because they could be providing data on the wrong aquifer. This type of well data should not be used to remove any NC polygons.

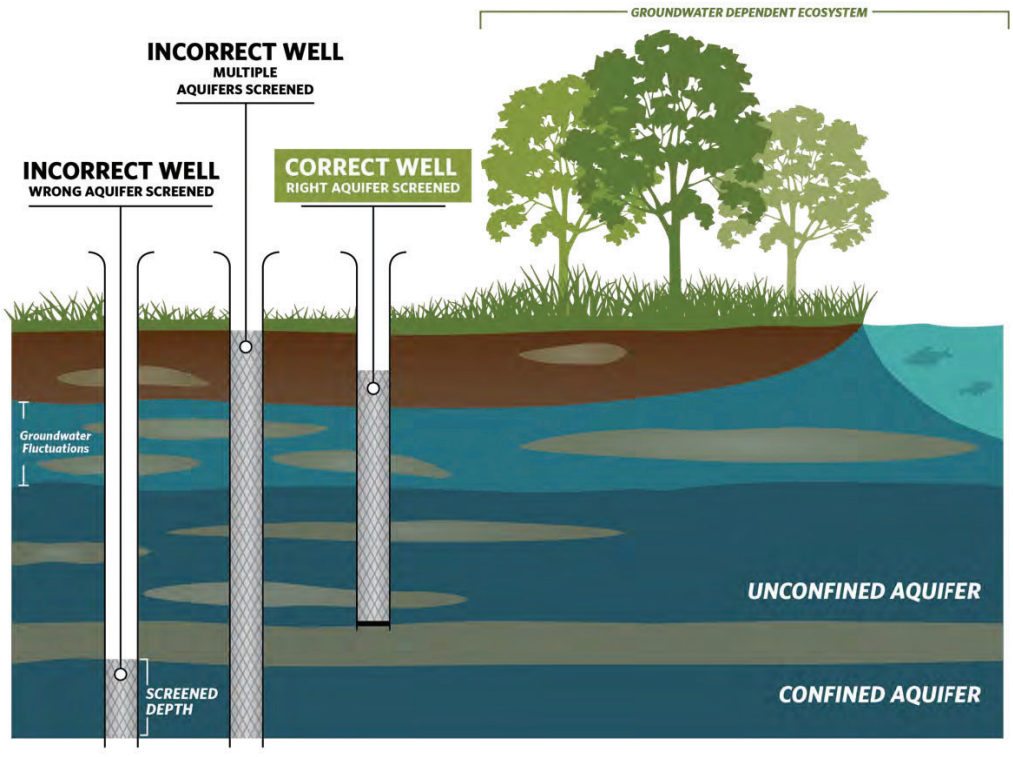


Figure 5. Selecting representative wells to characterize groundwater conditions near GDEs.

BEST PRACTICE #5. Contouring Groundwater Elevations

The common practice to contour depth-to-groundwater over a large area by interpolating measurements at monitoring wells is unsuitable for assessing whether an ecosystem is supported by groundwater. This practice causes errors when the land surface contains features like stream and wetland depressions because it assumes the land surface is constant across the landscape and depth-to-groundwater is constant below these low-lying areas (Figure 6a). A more accurate approach is to interpolate **groundwater elevations** at monitoring wells to get groundwater elevation contours across the landscape. This layer can then be subtracted from land surface elevations from a Digital Elevation Model (DEM)[11] to estimate depth-to-groundwater contours across the landscape (Figure b; Figure 7). This will provide a much more accurate contours of depth-to-groundwater along streams and other land surface depressions where GDEs are commonly found.

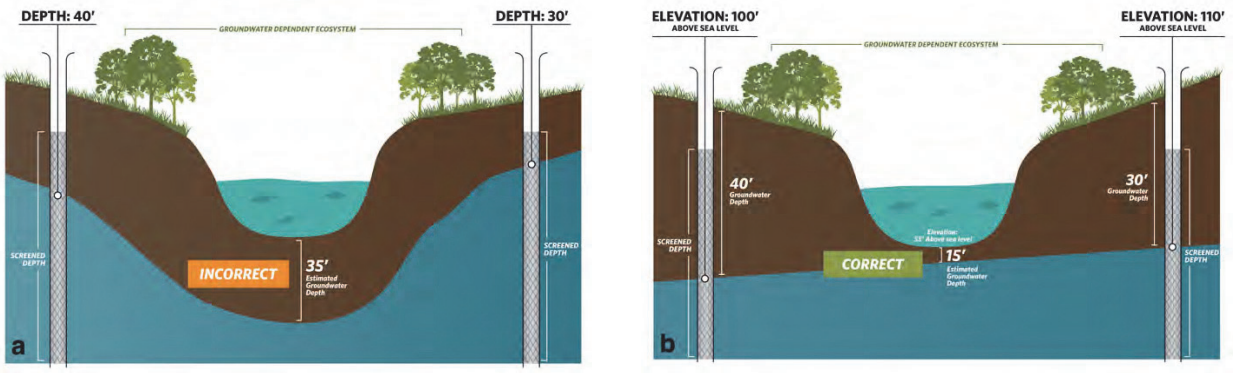


Figure 6. Contouring depth-to-groundwater around surface water features and GDEs. (a) Groundwater level interpolation using depth-to-groundwater data from monitoring wells. **(b)** Groundwater level interpolation using groundwater elevation data from monitoring wells and DEM data.

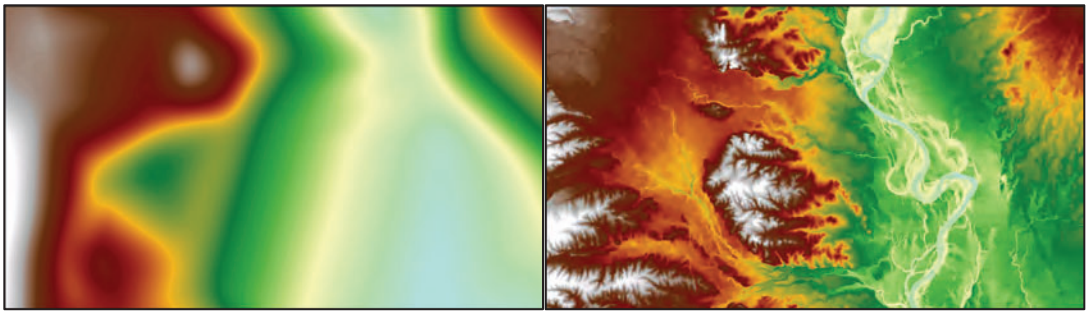


Figure 7. Depth-to-groundwater contours in Northern California. (Left) Contours were interpolated using depth-to-groundwater measurements determined at each well. **(Right)** Contours were determined by interpolating groundwater elevation measurements at each well and superimposing ground surface elevation from DEM spatial data to generate depth-to-groundwater contours. The image on the right shows a more accurate depth-to-groundwater estimate because it takes the local topography and elevation changes into account.

[11] USGS Digital Elevation Model data products are described at: https://www.usgs.gov/core-science-systems/ngp/3dep/about-3dep-products-services and can be downloaded at: https://iewer.nationalmap.gov/basic/

BEST PRACTICE #6. Best Available Science

Adaptive management is embedded within SGMA and provides a process to work toward sustainability over time by beginning with the best available information to make initial decisions, monitoring the results of those decisions, and using the data collected through monitoring programs to revise decisions in the future. In many situations, the hydrologic connection of NC dataset polygons will not initially be clearly understood if site-specific groundwater monitoring data are not available. If sufficient data are not available in time for the 2020/2022 plan, **The Nature Conservancy strongly advises that questionable polygons from the NC dataset be included in the GSP until data gaps are reconciled in the monitoring network.** Erring on the side of caution will help minimize inadvertent impacts to GDEs as a result of groundwater use and management actions during SGMA implementation.

KEY DEFINITIONS

Groundwater basin is an aquifer or stacked series of aquifers with reasonably well-defined boundaries in a lateral direction, based on features that significantly impede groundwater flow, and a definable bottom. *23 CCR §341(g)(1)*

Groundwater dependent ecosystem (GDE) are ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface. *23 CCR §351(m)*

Interconnected surface water (ISW) surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted. *23 CCR §351(o)*

Principal aquifers are aquifers or aquifer systems that store, transmit, and yield significant or economic quantities of groundwater to wells, springs, or surface water systems. *23 CCR §351(aa)*

ABOUT US

The Nature Conservancy is a science-based nonprofit organization whose mission is *to conserve the lands and waters on which all life depends*. To support successful SGMA implementation that meets the future needs of people, the economy, and the environment, TNC has developed tools and resources (www.groundwaterresourcehub.org) intended to reduce costs, shorten timelines, and increase benefits for both people and nature.

Attachment E

Maps of representative monitoring sites in relation to key beneficial users

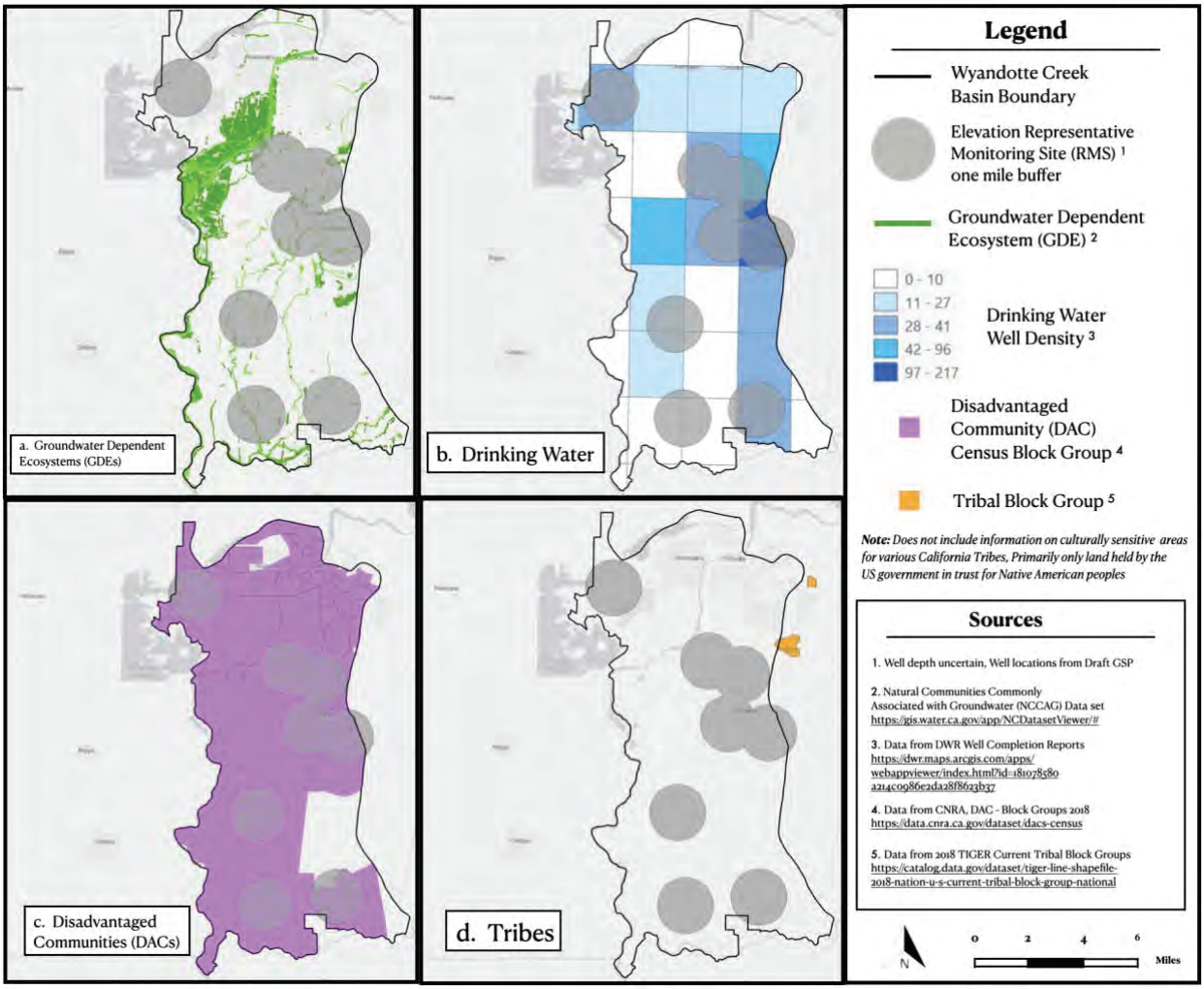


Figure 1. Groundwater elevation representative monitoring sites in relation to key beneficial users: a) Groundwater Dependent Ecosystems (GDEs), b) Drinking Water users, c) Disadvantaged Communities (DACs), and d) Tribes.

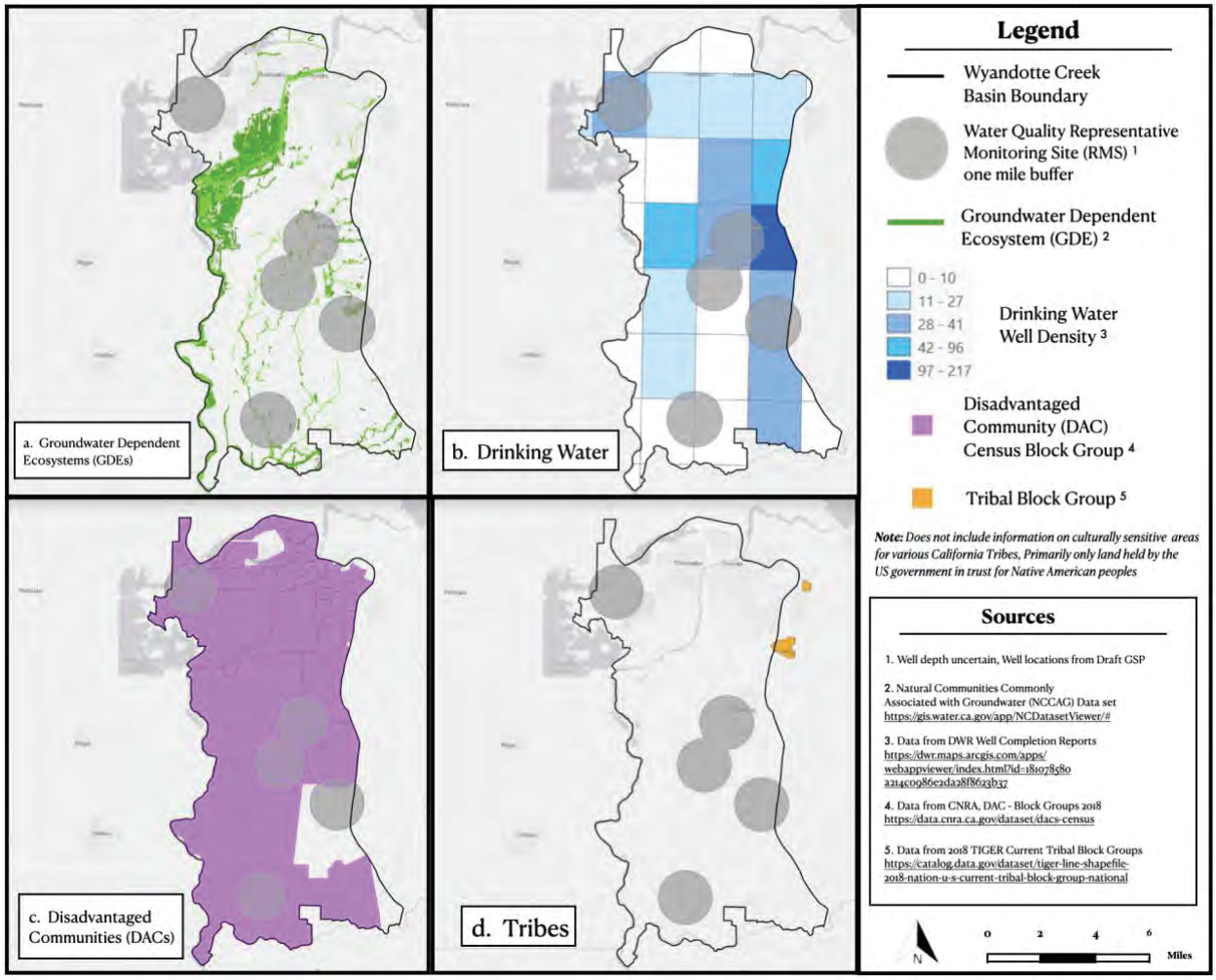


Figure 2. Groundwater quality representative monitoring sites in relation to key beneficial users: a) Groundwater Dependent Ecosystems (GDEs), b) Drinking Water users, c) Disadvantaged Communities (DACs), and d) Tribes.

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State of California – Natural Resources Agency
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

WC Draft GSP
Letter A2

October 7, 2021

Butte County Department of Water & Resource Conservation
Wyandotte Creek Subbasin
308 Nelson Avenue
Oroville, CA 95965
Email: wyandotteGSA@buttebasingroundwater.org

Subject: COMMENTS ON THE WYANDOTTE CREEK SUBBASIN DRAFT GROUNDWATER SUSTAINABILITY PLAN

The California Department of Fish and Wildlife's (Department) North Central Region is providing comments on the Wyandotte Creek Subbasin Draft Groundwater Sustainability Plan (GSP) prepared by the Wyandotte Creek Groundwater Sustainability Agency (GSA) pursuant to the Sustainable Groundwater Management Act (SGMA).

As trustee agency for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species (Fish & Game Code §§ 711.7 and 1802).

Development and implementation of GSPs under SGMA represents a new era of California groundwater management. The Department has an interest in the sustainable management of groundwater, as many sensitive ecosystems and species depend on groundwater and interconnected surface waters, including ecosystems on Department-owned and -managed lands within SGMA-regulated basins.

SGMA and its implementing regulations afford ecosystems and species specific statutory and regulatory consideration, including the following as pertinent to Groundwater Sustainability Plans:

- GSPs must **consider impacts to groundwater dependent ecosystems** (GDEs) (Water Code § 10727.4(l); see also 23 CCR § 354.16(g));
- GSPs must consider the interests of all beneficial uses and users of groundwater, including environmental users of groundwater (Water Code § 10723.2) and GSPs must **identify and consider potential effects on all beneficial uses and users of groundwater** (23 CCR §§ 354.10(a), 354.26(b)(3), 354.28(b)(4), 354.34(b)(2), and 354.34(f)(3));
- GSPs must **establish sustainable management criteria that avoid undesirable results** within 20 years of the applicable statutory deadline, including **depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water** (23 CCR § 354.22 *et seq*. and Water Code §§

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10721(x)(6) and 10727.2(b)) and describe monitoring networks that can identify adverse impacts to beneficial uses of interconnected surface waters (23 CCR § 354.34(c)(6)(D)); and

- GSPs must **account for groundwater extraction for all water use sectors,** including managed wetlands, managed recharge, and native vegetation (23 CCR §§ 351(al) and 354.18(b)(3)).

Furthermore, the Public Trust Doctrine imposes a related but distinct obligation to consider how groundwater management affects public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to navigable surface waters and surface waters tributary to navigable surface waters are also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses (Environmental Law Foundation v. State Water Resources Control Board (2018), 26 Cal. App. 5th 844). Accordingly, groundwater plans should consider potential impacts to and appropriate protections for navigable interconnected surface waters and their tributaries, and interconnected surface waters that support fisheries, including the level of groundwater contribution to those waters.

In the context of SGMA statutes and regulations, and Public Trust Doctrine considerations, the Department values SGMA groundwater planning that carefully considers and protects groundwater dependent ecosystems (GDEs) and fish and wildlife beneficial uses and users of groundwater and interconnected surface waters.

COMMENT OVERVIEW

The Department is writing to support ecosystem preservation in compliance with SGMA and its implementing regulations based on Department expertise and best available information and science.

The Department recognizes and appreciates the effort of the GSA to characterize subbasin groundwater conditions based on the data available. However, the Department believes the GSP could improve its consideration of environmental users of groundwater and establish more protective management criteria. Accordingly, the Department recommends that the Wyandotte Creek Subbasin GSA address the following comments before submitting the GSP to the Department of Water Resources (DWR).

COMMENTS AND RECOMMENDATIONS

The Department comments are as follows:

1. **Comment #1 Groundwater Dependent Ecosystems** (Groundwater Conditions, 2.2.7 Groundwater Dependent Ecosystems; starting page 50): GDE identification, required by 23 CCR § 354.16(g), is based on methods that risk exclusion of ecosystems that may depend on groundwater.

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a. *Issues*:

i. "Not Likely a GDE" Area Identification: The methodology used to classify potential GDE areas within the Natural Communities Commonly Associated with Groundwater (NCCAG) dataset primarily involved desktop review of aerial imagery from four drought years: 2007, 2009, 2013, and 2015 (line 1982). Potential GDE areas were classified as "Not Likely a GDE" if the areas were located within 150 feet of perennial surface water supplies, 150 feet of rice fields, 50 feet of other irrigated agriculture, or 150 feet of agricultural-dependent surface waters. This GDE-elimination method may disregard a GDE's adaptability and opportunistic approach to accessing water in which the vegetation may rely on *both* surface water and groundwater between seasons and years. Without additional analysis that compares the potential rooting depths of groundwater dependent vegetation with the depth to groundwater below the ground surface, there is insufficient information to categorize these potential GDE areas as "Not Likely a GDE." The GDE analysis also classifies potential GDEs from the NCCAG dataset as "Not Likely a GDE" if the vegetation "did not indicate surviving conditions" over the four drought years reviewed for the analysis. During drought years, it is likely that GDEs were experiencing adverse impacts due to combined groundwater depletion and reduced surface water availability. For instance, in 2015, groundwater extraction increased to replace more than 70% of lost agricultural water supplies (Lund 2018); additional groundwater pumping during drought years may have lowered the groundwater table below the rooting zone of GDEs that had previously been able to access groundwater, leading to significant impacts or mortality. The GSP states that impacts or minimum threshold exceedances that occur during dry water year types would not constitute an undesirable result (See Comment #2(iv)). It is inappropriate to simultaneously abdicate management responsibility for impacts to groundwater users during dry water year types (see Comment #2(iv)) while at the same time relying on impacts that occurred during drought years to categorize potential GDE areas as "Not Likely a GDE."

ii. Special Status Species: SGMA defines GDEs as ecological communities *or species* that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface [23 CCR § 351 (m)]. The GSP does not identify or discuss species that may be present within the

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subbasin that rely on groundwater, groundwater dependent ecosystems, or interconnected surface waters.

iii. Tree Species: In discussing potential impacts of groundwater depletions on GDEs or interconnected surface waters, the GSP refers to "deep-rooted tree species" (lines 168, 3208, 3273). This phrasing is narrow and excludes consideration of all vegetation types that may be groundwater dependent or supported by interconnected surface waters apart from tree species.

b. *Recommendations*:

i. "Not Likely a GDE" Area Identification: To assess potential GDE areas located near surface waters or irrigated areas, the GSP should incorporate a comparison of potential rooting depths with the groundwater surface elevation. Analysis of groundwater surface elevations should include multiple years that are representative of multiple water year types. The GDE analysis as it relates to survivability during drought years should consider the impacts of drought and increased pumping on groundwater elevation and compare those levels to GDE rooting depths. A more robust analysis would also incorporate other metrics of GDE health, including Normalized Difference Vegetation Index (NDVI) to compare between potential GDE areas and known non-groundwater dependent vegetation, rather than simply reviewing aerial imagery for indications of survival. Until sufficient information is presented to support the classification of these areas as "Not Likely a GDE," the areas should be conservatively classified as "Uncertain." The Department appreciates the GSP's acknowledgement that Valley Oak (*Q. lobata*) can access groundwater at a variety of depths and inclusion of areas containing Valley Oak communities as "Likely GDE."

ii. Special Status Species: The Department recommends the GSP include a list of special status species that may be present within the Wyandotte Creek Subbasin and an assessment of each species' likely groundwater dependence. The GSP should also include a spatial assessment of special status species within the subbasin to characterize which surface waters or GDE areas provide these species habitat or forage; this level of GDE-species-relationship assessment enables GSAs to prioritize GDE monitoring and management decisions.

iii. Tree Species: The Department recommends the GSP language referring to "deep-rooted tree species" be updated to be inclusive of groundwater dependent vegetation more broadly.

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2. **Comment #2 Sustainable Management Criteria** (Sustainable Management Criteria; 3.3 Groundwater Levels Sustainable Management Criteria, 3.8 Interconnected Surface Water Sustainable Management Criteria; starting page 88): Interconnected surface water (ISW) sustainable management criteria (SMC) is unlikely to protect against undesirable results for groundwater dependent ecosystems and fish and wildlife beneficial uses and users of groundwater and interconnected surface waters.
    a. *Issues*:
        i. Groundwater Level Proxy Metric: The GSP identifies a data gap related to interconnected surface waters within the subbasin and therefore defaults to using groundwater levels as a proxy metric. However, the GSP does not provide evidence that "significant correlation exists between groundwater level elevations" and depletions of interconnected surface waters [23 CCR § 354.36(b)(1)]. The GSP states that there are no multi-completion wells or nested monitoring well sites located within the subbasin to assess vertical groundwater gradients and characterize connectedness between shallower and deeper aquifer zones. While the Department recognizes the lack of available data and uncertainty surrounding aquifer heterogeneity as it relates to vertical conductivity between aquifer zones, if a significant correlation is lacking between the shallower aquifer zones that are likely interconnected with surface waters and deeper zones where pumping occurs and that are monitored for the groundwater level sustainable management criteria (SMCs), use of groundwater levels as a proxy metric for ISW depletions may misinform groundwater management activities and poorly predict instream habitat conditions for fish and wildlife species.
        ii. ISW Framework: The Department acknowledges the GSP's identification of the data gap related to interconnected surface water and appreciates the development of a framework to guide data collection efforts. However, while the ISW Framework identifies the types of measurements and data necessary to better characterize groundwater-surface water interactions within the subbasin, it does not discuss the methods that will be used to identify the number or locations of groundwater monitoring wells or stream gages.
        iii. Minimum Thresholds and Measurable Objectives: Minimum thresholds (MTs) and measurable objectives (MOs) for groundwater levels, and by proxy for depletions of interconnected surface water, are not likely to prevent undesirable results for environmental beneficial uses and users

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of groundwater and interconnected surface water, including groundwater dependent ecosystems. For representative monitoring sites, measurable objectives are set to the groundwater level projected to occur in 2030 based on the trendline of historical data; management to this level would result in groundwater levels falling below historic lows for many of the monitoring wells. The interim milestone groundwater elevations for each representative monitoring site (Table 3-1, page 92) outline a continued decline from current groundwater levels as the SGMA implementation period progresses; this continued downward trajectory of long-term groundwater decline is the very trend that SGMA was designed to combat. The GSP states that the year 2030 was chosen due to the assumption that it would take until this date to implement projects and management actions (line 2972). While the Department acknowledges that some planned PMAs involving supply augmentation may require this length of time to implement, other projects or management actions related to conservation could be implemented in a shorter timeframe, allowing the GSAs to establish more protective MOs rather than defaulting to the trend of long-term groundwater decline. MTs for groundwater levels, which the GSP asserts are designed to be protective of domestic wells, are set far below MOs, and would allow groundwater levels to fall significantly before experiencing what the GSP considers an undesirable result. For instance, within the Oroville Management Area, the MT for representative monitoring site 16Q001M is set 48 feet below the MO (Table 3-1). In setting groundwater level SMCs as proxy metrics for the depletion of interconnected surface waters, the GSP fails to analyze or discuss potential impacts of the established criteria on the rate or volume of surface water depletions or on groundwater dependent ecosystems in areas that have historically demonstrated shallow groundwater levels accessible to environmental users. Under the established SMCs that allow for continued groundwater decline from current conditions, the Department expects that fish and wildlife beneficial uses and users of groundwater and interconnected surface waters could lose access to shallow groundwater water supplies and experience significant and unreasonable impacts prior to the minimum thresholds being reached, including decline of GDEs and ISW habitat suitable for cold water fisheries. The established SMCs would allow groundwater levels to drop well below levels that occurred in 2015, which was the second of back-to-back critically dry water years in the

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Sacramento Valley during which time vegetated and aquatic GDEs experienced adverse impacts including stressed or dying riparian vegetation, poor instream habitat availability, and increased water temperatures (DFW 2019). The Department does not believe groundwater levels above the proposed minimum thresholds and below the proposed measurable objectives (in the margin of operational flexibility) will allow the basin to achieve sustainability, particularly with respect to avoiding undesirable results for fish and wildlife beneficial uses and users of groundwater and interconnected surface water.

iv. Undesirable Results: The GSP defines an undesirable result for depletions of interconnected surface waters as "avoiding significant and unreasonable depletion of surface water flows caused by groundwater pumping that significantly impacts beneficial uses." Though the GSP includes a list of potential impacts to environmental uses and users as identified by stakeholders (page 97, line 3203), the GSP does not include any discussion or analysis of whether the established SMCs sufficiently avoid these identified potential impacts to GDEs or environmental users of interconnected surface waters. The Feather River supports both fall-run and spring-run Chinook salmon (*O. tshawytscha);* spring-run Chinook are listed as threatened under both the State and Federal Endangered Species Acts. The GSP identifies the Feather River as gaining in all months, with average monthly gains from groundwater contributing approximately 44 cubic feet per second (cfs). The GSP fails to analyze the impacts of continued, long-term groundwater depletion on the Feather River and the associated species impacts that would result from decreased flows and/or increased water temperatures. Additionally, the GSP notes that groundwater levels that fall below the minimum threshold during hydrologically dry or critically dry years are not considered to be an indicator of undesirable results (page 90, line 2947). This means proposed indicators of undesirable results (i.e., SMC) for groundwater levels and depletions of interconnected surface water effectively do not exist for dry water years. This absence of undesirable results indicators for certain water years means beneficial users of groundwater and interconnected surface water may experience significant and unreasonable effects throughout the duration of dry or critical water years before the undesirable results are 'identified' and managed. Accordingly, there is no groundwater management accountability during the most challenging of years for water resource managers and fish and

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wildlife beneficial users alike. Moreover, the frequency and intensity of dry water year types is expected to increase in California (Mann & Gleick, 2015), meaning if accepted as is, this GSP would have no groundwater management accountability during increasingly prevalent and challenging periods of dryness without the certainty of subsequent wet periods.

v. SMC Triggers: The GSP states that for the established SMCs, if observed data "trend toward the locally defined MT, this will trigger action on part of the GSAs." It is unclear over what time period data will need to be collected in order to establish a 'trend' toward the SMCs, and what action will be triggered.

b. *Recommendations*:

i. Groundwater Level Proxy Metric: To justify use of groundwater elevations as a proxy metric for depletions of interconnected surface water until additional data can be collected, the GSP should specify how groundwater elevations are significantly correlated to surface water depletions. Alternatively, if groundwater elevation is not a defensible proxy, the GSP should: 1) specify their plans for better approximating the volume and timing of ISW depletions attributable to groundwater extraction [23 CCR § 354.28(c)(1)] using the anticipated data collection that will fill the ISW data gap (See Comment #5); and 2) select more conservative interim SMC to protect ISW until such time as more information is available.

ii. ISW Framework: The Department recommends that the GSP identify discrete timing and locations for planned groundwater and streamflow monitoring sites as needed to address the identified ISW data gap. Installation of wells and gages and data collection should be completed prior to the first 5-year plan update (See Comment #5).

iii. Minimum Thresholds and Measurable Objectives: The Department recommends the GSP identify representative monitoring sites located near interconnected surface waters and/or groundwater dependent ecosystems and reselect minimum thresholds that would better protect environmental uses and users of groundwater, rather than enabling immense declines in groundwater over the implementation horizon.

iv. Undesirable Results: The Department recommends that the GSP include additional information related to how environmental beneficial users of groundwater may experience the effects of undesirable results. For instance, the GSP should explicitly discuss the relationship between the proxy groundwater level SMCs, modeled monthly depletions of

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interconnected surface waters, water temperatures, and the impacts of lowering groundwater levels below historic lows on groundwater dependent ecosystems. The GSP should also identify undesirable results indicators for dry and critically dry water years for all sustainability indicators.

v. SMC Triggers**:** While the Department appreciates that the GSP includes discussion of triggers that will initiate GSA action to avoid reaching minimum thresholds, the Department recommends establishing specific trigger metrics for each sustainability indicator that when reached, would initiate GSA action, and defining the actions to be taken. For environmental users of groundwater, including groundwater dependent ecosystems, triggers should include not only groundwater levels but also physical indicators such as NDVI.

3. **Comment #3 Monitoring Network** (Monitoring Networks, 4.9.1 Groundwater Levels, 4.10 Network Assessments and Improvements; starting page 112): The groundwater level monitoring network may not sufficiently monitor impacts to groundwater dependent ecosystems.
    a. *Issue*: The GSP uses both the groundwater level SMCs and representative monitoring network as a proxy for evaluating impacts to interconnected surface waters and GDEs until additional information can be collected. The GSP primarily considered domestic well protection when establishing SMCs for groundwater levels and selecting representative monitoring sites. It is unclear whether any of the selected groundwater level monitoring wells are located near areas with likely groundwater dependent ecosystems and if plan implementation will involve comparing water depths in representative monitoring sites to the rooting depths of nearby GDE communities.
    b. *Recommendation*: The Department recommends that the GSP assess the groundwater level monitoring network, and by proxy, the monitoring network for interconnected surface waters, for its ability to characterize potential impacts and undesirable results for groundwater dependent ecosystems (See Comment 2(iv)). If wells within the representative monitoring network are not located near identified groundwater dependent ecosystems, a discrete number of groundwater monitoring wells should be installed to capture groundwater trends that would affect priority GDEs. Additional analysis related to the locations of special status species within the subbasin and the groundwater dependent ecosystems that support them can be used to prioritize areas for increased monitoring (See Comment 1(ii)).

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4. **Comment #4 Project and Management Actions** (Project and Management Actions; 5.2.2 Project Implementation; starting page 118): Project and management actions (PMAs) may not be sufficient to achieve sustainability, and timelines for pursuing additional PMAs are needed.
    a. *Issue*: The Department recognizes that the GSP identifies Potential Projects that are in the planning phase and may be implemented in addition to the four Planned Projects if necessary to achieve sustainability in the subbasin. However, the GSP fails to identify specific metrics or timelines that would trigger the implementation of additional PMAs if unexpected delays occur, or if the Planned Projects fail to yield the projected benefits to the subbasin.
    b. *Recommendation*: The GSP should include details on specific metrics, targets, and timelines that if not reached with implementation of the planned PMAs will trigger the implementation of additional PMAs. The Department recommends identifying the projects, including those aimed at reducing demand through conservation, that could be implemented on short timescales if needed for the subbasin to achieve sustainability.

5. **Comment # 5 Interconnected Surface Water Data Gap** (Plan Implementation; 6.3 Schedule for Implementation; starting page 146): A more detailed time schedule for collecting additional data and revising the sustainable management criteria for depletion of interconnected surface water is needed.
    a. *Issue*: The GSP identifies information related to the depletion of interconnected surface water as a data gap, and the plan proposes a framework to collect additional information needed to revise the ISW SMCs. The GSP states that "an aggressive schedule" has been provided to fill the data gap in Section 6 (line 3282. However, during Department review, no time schedule related to the ISW Framework or data gap filling effort could be identified. No discrete time schedule is provided for installation of necessary groundwater wells and stream gages, refinement of the characterization of interconnected surface waters within the subbasin, and updates to the SMCs.
    b. *Recommendation*: The GSP should include a detailed time schedule for completing each action as outlined in the ISW SMC Framework to characterize interconnected surface waters in the subbasin and establish appropriate SMCs. The ISW SMC Framework should be completed prior to the first 5-year plan update so that management criteria can be effectively established to protect environmental users of groundwater and interconnected surface waters throughout the implementation period.

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CONCLUSION

In conclusion, though the draft GSP accurately identifies the need to improve monitoring of shallow groundwater and interconnected surface water systems, the GSP lacks a robust analysis of potential impacts to environmental beneficial users and should establish more protective management criteria. The Department recommends that the Wyandotte Creek Subbasin GSA address the above comments before GSP submission to DWR to best prepare for the following regulatory criteria for plan evaluation:

1. The assumptions, criteria, findings, and objectives, including the sustainability goal, undesirable results, minimum thresholds, measurable objectives, and interim milestones are not reasonable and/or not supported by the best available information and best available science. [23 CCR § 355.4(b)(1)] (See Comments #1, 2, 3)
2. The GSP does not identify reasonable measures and schedules to eliminate data gaps. [23 CCR § 355.4(b)(2)] (See Comments #3, 5)
3. The interests of the beneficial uses and users of groundwater in the basin, and the land uses and property interests potentially affected by the use of groundwater in the basin, have not been considered. [23 CCR § 355.4(b)(4)] (See Comments #1, 2, 3)
4. The projects and management actions are not feasible and/or not likely to prevent undesirable results and ensure that the basin is operated within its sustainable yield. [23 CCR § 355.4(b)(5)] (See Comment #4)

The Department appreciates the opportunity to provide comments on the Wyandotte Creek Subbasin Draft GSP. Please contact Bridget Gibbons, Environmental Scientist, by email at Bridget.Gibbons@wildlife.ca.gov with any questions.

Sincerely,

DocuSigned by:
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Kevin Thomas
Regional Manager, North Central Region

Enclosures (Literature Cited)

ec:

California Department of Fish and Wildlife

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Audubon | CALIFORNIA

October 24, 2021

Butte County Department of Water & Resource Conservation
RE: Wyandotte Creek Subbasin GSP
308 Nelson Avenue
Oroville, CA 95965

Sent via email to: WyandotteGSA@gmail.com

Re: Comments on the Draft Groundwater Sustainability Plan for the Wyandotte Creek Subbasin Groundwater Sustainability Agency

To Wyandotte Creek Subbasin Groundwater Sustainability Agency,

Audubon California appreciates the opportunity to provide public comment on the draft Groundwater Sustainability Plan (GSP) for the Wyandotte Creek Subbasin Groundwater Sustainability Agency (GSA). Audubon California is a statewide nonprofit organization with a mission to protect birds and the places they need. Our organization has a long history of solutions-focused work in the Central Valley in collaboration with state and federal agencies, water districts, non-profits, and landowners. Audubon is reviewing draft GSPs as a stakeholder for the environment with a particular focus on managed wetlands. We are commenting on draft GSPs to provide technical assistance to Groundwater Sustainability Agencies (GSAs) to improve their GSPs prior to their final submission to the Department of Water Resources in January 2022. Audubon would also like to identify areas of opportunity to partner with landowners and GSAs to provide groundwater and wildlife habitat benefits in the implementation of the Sustainable Groundwater Management Act (SGMA).

Over 90 percent of historic wetlands in the Central Valley have been replaced with agriculture or urban development. Disconnected from natural water sources as a consequence of surface water diversions and groundwater over-pumping, wetland landowners must utilize surface water deliveries or pump groundwater to provide flooded habitat. But managed wetlands provide outsized public trust benefits for their minor water use.

The remaining wetlands in the Central Valley are a critical component of the Pacific Flyway, supporting millions of migratory waterfowl, hundreds of thousands of shorebirds, and state listed species like the Tricolored Blackbird. Central Valley managed wetlands are part of California's commitment to national and international Pacific Flyway agreements and provide significant public trust benefits, including habitat for migratory birds, recharge of overdrafted aquifers, carbon sequestration, and recreation opportunities for birders, hunters, and disadvantaged communities.

Managed wetlands require specific consideration in GSPs under SGMA statute and regulations, as detailed below. GSAs are required to identify managed wetlands as beneficial users of groundwater and as land uses and property interests and should recognize this land use consistent with other active users of surface and groundwater. The overall basin water budget must include managed wetlands as a specific water use sector and the GSP is required to consider the effects of the GSP on managed wetlands as a beneficial user or land use.

When GSPs fail to adequately consider the water needs and recharge contributions of managed wetlands, projects and management actions may ignore managed wetlands, their need for protection as public trust resources, and their potential to be part of sustainability solutions. If future actions include groundwater allocations, managed wetlands face the potential of being excluded if not recognized in the GSP, risking further loss in critical wetland acreage.

SGMA Requirements Related to Managed Wetlands

A primary requirement for GSAs during GSP development is the consideration of the interests of "all beneficial uses and users of groundwater" [Water Code Section 10723.2], which includes "[e]nvironmental users of groundwater" [Water Code Section 10723.2(e)].

Articulated into the SGMA regulations, the concept of beneficial uses and users of groundwater is first represented in CCR, Title 23, Section 354.10. Notice and Communication, which directs the GSP to "…include a summary of information relating to notification and communication by the Agency with other agencies and interested parties including the following: (a) A description of the beneficial uses and users of groundwater in the basin, including the land uses and property interests potentially affected by the use of groundwater in the basin, the types of parties representing those interests, and the nature of consultation with those parties." [emphasis added].

Furthermore, the SGMA regulations provide a definition that explicitly includes managed wetlands as a beneficial user where:

> "'Water use sector' refers to categories of water demand based on the general land uses to which the water is applied, including urban, industrial, agricultural, managed wetlands, managed recharge, and native vegetation." CCR, Title 23, Section 351(al) [emphasis added].

GSAs are then directed to include all water user sectors in the description of the GSP area and to quantify groundwater use by these sectors in the historic, current and projected budgets [emphasis added]:

> CCR §354.8. Description of Plan Area: Each Plan shall include a description of the geographic areas covered, including the following information:
>
> (a) One or more maps of the basin that depict the following, as applicable:
>
> (4) Existing land use designations and the identification of water use sector and water source type.
>
> and,
>
> CCR §354.18. Water Budget:
>
> (b) The water budget shall quantify the following, either through direct measurements or estimates based on data:
>
> (3) Outflows from the groundwater system by water use sector, including evapotranspiration, groundwater extraction, groundwater discharge to surface water sources, and subsurface groundwater outflow.

Given these explicit requirements, GSAs are required to identify and map managed wetlands and include their water needs in water budgets in the GSP.

Furthermore, each GSP is also required to describe "undesirable results" where such included:

> "Potential effects on the beneficial uses and users of groundwater, on land uses and property interests, and other potential effects that may occur or are occurring from undesirable results." CCR, Title 23, Section 354.26(b)(3) [emphasis added]

Comment Overview

GSAs are required to consider public trust resources in their GSPs, including managed wetlands. In reviewing this draft GSP, we see the GSA is working hard to minimize the impacts to its growers in the subbasin. It is essential these efforts also include the managed wetlands. As beneficial users of water, these habitats provide essential waterbird food and critical habitat, often requiring the application of surface or groundwater similar to cropped lands.

While the Butte Basin Groundwater Model (BBGM) used to prepare historic, current and future water budgets includes reference to managed wetlands acreage and demand (a draft version of the BBGM model documentation, as provided in October 2021, was reviewed), it did not readily present the input assumptions regarding managed wetland acres to allow assessment of whether all managed wetlands are included – state, federal, and private.

This is most prominently represented in Figure 1-6 through Figure 1-8 where the GSP represents lands uses and ownership. Managed wetlands are not designated as a "crop type" or "land use" in the first two figures, and the representation of state and federal lands reflects only those lands owned by state or federal agencies, missing private wetlands. Absent additional explanation in the GSP or the BBGM to assess the acres represented as managed wetlands, Audubon is concerned the GSP underrepresents this important land use. Further clarification, including a table and/or updated maps, would allow for a better understanding of the GSP's handling of this beneficial user.

Our comments are summarized as follows:

1. Identification of managed wetlands: Audubon appreciates that the GSA has identified and specifically included managed wetlands in maps and water budgets. However, we note two concerns:
    a. Significant acreage of lands enrolled in the United States Natural Resource Conservation Service's Wetland Reserve Program (WRP) and represented in DWR's 2016 Statewide Crop Mapping layer seem to be excluded from the mapping and therefore likely from the inputs to the Butte Basin Groundwater model (BBGM), which was used to prepare historic, current and future water budgets (see Figure 2-8).
    b. Details regarding managed wetland acres and assumed evapotranspiration (ET) rates are absent.
2. Water budget: Inclusion of managed wetlands as a specific component of the water budgets (e.g. Table 2-5) is appreciated. While reference is made to the assumptions in the BBGM, review of the BBGM model documentation did not reveal details regarding the assumed managed wetland acres within the Wyandotte Creek subbasin under each water budget nor the assumed ET and related details that would drive the water budget calculations. Furthermore, it is not clear if all managed wetlands, including WRP lands, were included in the BBGM and thus whether water demands for managed wetlands were fully recognized. As such, Audubon is concerned that the future conditions inadequately account for the water needs of managed wetlands.
3. Identification of data gaps: The lack of information regarding the water needs for managed wetlands should be identified as a data gap in the GSP. Specifically, on page 60, the GSP notes

that agricultural demands (including managed wetlands) and groundwater pumping were estimated using the BBGM. But the BBGM indicates ET was determined using remote sensing data and corresponding crop coefficients, but does not list a crop coefficient for managed wetlands. As such, it is unclear whether the appropriate water needs of managed wetlands have been adequately represented in the water budgets. Furthermore, Audubon supports the next steps for the water budget, noted on pages 82-83, and highlight managed wetlands as a water sector that should be included in future refinements of surface water diversions, groundwater pumping, and deep percolation.

4. Consideration of managed wetlands: While managed wetlands are appropriately included in the GSP separate from groundwater dependent ecosystems, there seems to be limited discussion about the role managed wetlands have as part of projects and management action solutions. For instance, managed wetlands provide opportunities for multi-benefit recharge and should be part of discussions about FloodMAR programs.

Draft Groundwater Sustainability Plan Page-by-Page Comments

Additional page-by-page comments on the GSA's draft GSP are detailed below. We welcome any follow up questions and look forward to seeing the issues raised below addressed in the final GSP submission in January 2022.

Figure 1-6: Land use map should also show the location of managed wetlands.

Figure 1-7: Crop type should include managed wetlands.

Figure 1-8: Private lands with state or federal easements, such as the NRCS Wetland Reserve Program, should be included.

P. 21: Does the category "surface water users" include any managed wetlands that apply surface water to meet the managed wetland water needs or are managed wetlands only included in the category "environmental users of groundwater"?

P. 54: The category "Not Likely a GDE Due to Supplemental Water Supplies" indicates a determination was made for managed wetlands that rely on supplemental water to meet applied water needs. Elsewhere in the GSP, information regarding whether this supplemental water is pumped groundwater or applied surface water is lacking (see related comment for page 21). Additional details regarding the managed wetland acres, applied water needs, and water sources should be referenced. As noted previously in this comment letter, review of the BBGM indicates the information is not clearly documented in this referenced document either.

P. 59, Table 2-4: Why were surface water diversions for the current condition baseline water budget limited to 2015 and 2016? These years reflect low surface water availability due to drought constraints and State Water Resources Control Board imposed water right curtailments. For managed wetlands that may rely on surface water, this would be a misrepresentation of long term needs. Since the current condition assumptions regarding water supplies are carried forward to the future conditions, the potential misrepresentation of managed wetland water supplies due to limiting to 2015 and 2016 may incorrectly affect future water budgets and results.

P. 60: The bullets explaining the water budget procedures do not provide the necessary details regarding assumptions specifically made for managed wetlands. For instance, groundwater

pumping is estimated by estimating total demand then subtracting applied surface water quantities – referencing the BBGM as the source document for the assumptions. Upon reviewing the BBGM draft documentation, the details regarding these assumptions are also not provided so it is unclear what assumptions were made to calculate managed wetland demands and what surface water quantities were available. There needs to be improved documentation in the BBGM if it is a primary source for the water budgets presented in the GSP.

P. 67: The GSP notes that evapotranspiration (ET) is from several beneficial uses, including managed wetlands. However, details regarding the ET assumptions for managed wetlands are lacking. These special habitats can have several different water needs depending on how they are managed and the target species they are intended to benefit (e.g. fall flood up for habitat versus spring irrigation for feed). This same statement is repeated for each water budget condition on subsequent pages in the GSP (e.g. future conditions). This comment applies to each water budget.

P. 82, Recommended Next Steps: Efforts should be made to refine managed wetland water needs in the next steps taken in the water budget development.

P. 126, Flood MAR: Please include Audubon as a participant in planning efforts for recharge opportunities. Managed wetlands can provide unique opportunities to create recharge and habitat benefits.

Thank you for your consideration of Audubon California's comments. If you would like to discuss this matter further, please do not hesitate to contact me at (916) 737-5707 or via email at samantha.arthur@audubon.org.

Sincerely,



Samantha Arthur
Working Lands Program Director
Audubon California

Loeser, Kamie

From: Tasha Levinson <tdian@sbcglobal.net>
Sent: Saturday, September 25, 2021 7:39 PM
To: Willam Bynum; Buck, Christina; Peterson, Kelly
Subject: Comments to Wyandotte Creek GSP

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

Thank you to Bill Bynum, who allowed me to review the Wyandotte Creek GSP, and thank you to Christina Buck and Kelly Peterson, who did such an excellent job that I feel vastly more informed than I had been.
My comments are lengthy and range from typos, to thoughts that came to mind as I was reading, to concerns about the plan itself. I will try to reference comments by line number, or if that is not applicable, by page (p), figure (f) or table (t).

p. xii - add definition of LUST (fES-4 and 1727)
202-209 - while by reading the GSP I now understand that the MO intentionally was set at lower than "current condition", I still believe that since the intent is to "sustain what we have", that objective should not be lower than our current condition.
tES-1 - I would add and asterisk by the second to last well (16C001M) to note that it is the well depicted in fES-6 and fES-7)
fES-7 - please include the keys for the yellow and grey lines (or delete them from the table). Is year 49 an estimate for 2019 based on data from the year 2004? If so, I think a note to that effect should be included on line 307.
tES-1 - it would be great if you used the entire well numbers showing on fES-9 (or include a note letting the reader know to look for the last 7 characters of the well name when locating these wells on fES-9 -- also, why are the Cal Water Service wells not depicted on fES-9?)
f1-5 - I could not understand the key and certainly had no idea which areas are severely disadvantaged (unless, that is the point: the entire area is severely disadvantaged, it is just that the data came from different sources).
f1-9 thru f1-12 - all show a blank white space in the southeast corner; is that an area of no wells or of no data? Personally, I found the breakdown of separate figures for types of wells, each with its own key for well density, to be more confusing than helpful, but do not have a suggestion for clearer presentation.
651 - it would be more accurate to say, "Cal Water Service supplies water for residential and municipal use (a portion of which comes from groundwater)"
707-711 - it may also be appropriate to note that the fires destroyed many areas that normally obtain snow-pack and destroyed many areas that operate as a watershed for the snow-pack to gradually recharge surface and groundwater systems, and to note that climate change has increased temperatures so that evaporation losses will be greater than we ever have seen, and to note that the reservoir at Lake Oroville has been reduced by the accelerated impact of climate change to a mere puddle.
741, and 758-760 - each of these points reflect the concern to retain Butte County water for Butte County uses. While not directly relevant, this is the concern about the Tuscan Water District proposal (which would put control of a portion of the water impacting our area in the hands of non-local owners).
831 - I read about Cal Water's 3 wells, are there actually 4 and where is the 4th well.

877-8 - Cal Water's high water rates are difficult for both our immediate and long term financial viability (and, yes, they are aware that this is one of my continuing concerns).
above 907 - somewhere we might want to note that there is an ongoing problem related to quantity and quality of surface and groundwater due to numerous marijuana grows that have tended to operate under-the-radar and hence avoiding monitoring and/or regulation.
1168 - should "Cal Water Chico" read "Cal Water Oroville"?
1287-1290 - as most residents have heard only of the Tuscan formation, I believe mention of it should be included along with the references to Laguna and Ione.
1299 - I believe that the first sentence should read something like, :The Wyandotte Creek Subbasin lies southwest of the Oroville Reservoir (which is operated by license to DWR that significantly manages it for the benefit of Southern California contractors, in addition to providing local flood control and local recreational and environmental management)." Otherwise, anyone reading the report might believe that the reservoir is operated as a water-resource for our benefit.
f2-7 - I could not locate the Tuscan/Mehrten formation areas on your map (based on the description 1371-1374 on the prior page, I thought I should be able to find them).
1472-1474 - reading this, I assume that water from the principal aquifer is not used for agriculture; am I correct?
1538-1539 - sentence is not complete.
1540 - change the period to a colon to have this work.
f2-9 thru f2-12, include the date as part of the large type caption to make these easier to understand (e.g., f2-9 would read "WATER SURFACE ELEVATION Spring 2015")
f2-13 and f2-14 - where is the well shown in tES-1 as 16C001M?
1669-1670 - I believe these color-coding descriptions should be moved to be part of the f2-15 description. Also, somewhere note must be made that f2-15 ends at 2018 just before we entered the current drought and that, accelerating impacts of climate change are causing historic changes to the area (e.g., Oroville Reservoir is now a mud-puddle).
below 1728, I did not see mention of the Coppers site, nor did I see mention of the area portion of South Oroville that was used for Paradise fire clean-up.
t2-3 - is DWR spillway discharge subtracted from these figures or somehow accounted for in a way that the data is useful?
2066-2070 - it is my understanding that as part of Oroville's annexation of the Ruddy Creek area, an entire valley oak GDE will be eliminated if it has not already been done.
2103 - I question the use of 2004-5 (relatively normal years) to complete your time-span; I believe it would be more appropriate to use dry or critical years.
f2-25 - I observed what seems to be to be a noteworthy decrease in wet and above-normal years. That supports my concern that we look for a MO that is not below current conditions so that we truly are seeking to sustain what we have now, particularly considering how we all have been caught un-prepared by the accelerating impacts of climate change.
t2-5 and t2-6 - please see my comments above. I do believe your rainfall and evaporation predictions must be adjusted to reflect the problems we actually are facing. Also, I keep hearing about large diameter deep wells in Glenn County that may be draining our shared aquifer beyond any sustainability right now.
f2-26 through f2-35 - I found myself bounding back and forth from page to page, trying to mentally adjust for scale differences, trying to guess color-keys, etc., so that the substance was lost. My guess is that if you combine all of the figures for "land surface" and all of those for "groundwater" so that each can work off the same scale and color keys and allow the reader to compare historic, current, and projected data, this information would be very useful.
2412-2418 - given what has happened to Lake Oroville, I not sure there will be much stability to the Feather River in the future.
t2-9 - I have no idea what you are trying to tell me.

2753 - notes that the MT is described as a point where "undesirable results may begin to occur," Yet the MT the GSP sets is one where they already have started to occur.
2894-5 (and each place the same approach is applied): I continue to believe that requiring 2 RMS wells in each management area reach the MT for 2 consecutive non-dry years, sets the bar so low that we will be beyond help before we can get outside help. Given how few RMS wells we have, any 2 wells for the entire subbasin would make more sense. Also, the entire GSP reflects that we seem to have more-and-more dry years so that it is not clear to me that the stated standard ever can work.
2902-2903 - I read this to say that allowing domestic wells and other groundwater users to have their wells run dry is not an "Undesirable Result" -- do you really want our GSP to say this?
3219-3230 - Since DWR's license renewal to operate Oroville Dam has been held up for 15+ years awaiting a fish/wildlife study that finally was completed about 2 years ago, there should be something fairly recent that will fill much of this data gap.
f4-1 - please label the wells to match up to t4-1.
3531 - reference should be to Figure 4-3 (not 4-4).
Finally, from some of the many water meetings I have attended, I believe that if project 5.2.6.1 could be converted to permit the treated water in Thermalito's evaporation tanks to recharge Oroville's wildlife area that might solve Supervisor Connelly's injection concerns and put that water to good use in a relatively economical way. Also, a project to get 2,500 gallon storage tanks to well-dependent residences might be a very good thing for our area.

Again, I found this so informative and helpful! So sorry if it provoked too many thoughts. Thank you for such excellent work! Tasha

September 12, 2021

PUBLIC DRAFT FINAL Groundwater Sustainability Plan Wyandotte Creek Groundwater Subbasin

Public Comments Final

Draft pointsI seek to address are color highlighted.

The current Final Draft wordings are in Green, my comments are in Red and resource info I want to share is in Blue

I believe data gaps need to be addressed in this final draft.

125 stable, maintaining this posture in the future may become less the result of a state of nature and

126 more the reward for thoughtful management. The use of the word 'thoughtful' could be stronger as thoughts vary and are not always cooperated on. I think it should read well planned, up to date and cooperative management. (up to date is important as using old or incomplete data, outdated mindsets is an issue.

153 are already dry are not considered interconnected surface water. However, the upland streams are
154 an important source of recharge to the aquifer, so the health of these stream channels The health of the stream channels, this must be addressed as new developments get approved within the Wyandotte Creek GSA sub-basin (specifically one currently approved by the City of Oroville, that plans to alter the streambed and discharge polluted run-off waters into the Ruddy Creek stream.)and their
155 adjacent riparian zones is important to groundwater sustainability. Riparian zones within the Wynadotte Creek sub-basin must have current environmental documentation

This has been identified as a
156 data gap I believe this data gap needs to be addressed now.
https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/?cid=nrcs143_014199
What are riparian areas?
Riparian areas are lands that occur along watercourses and water bodies. Typical examples include flood plains and streambanks. They are distinctly different from surrounding lands because of unique soil and vegetation characteristics that are strongly influenced by the presence of water.
Values and functions of riparian areas:
Because of their variation across the country, riparian areas function in different ways. In spite of their differences, all riparian areas possess some similar ecological characteristics such as energy flow, nutrient cycling, water cycling, hydrologic function, and plant and animal population.

and will be addressed as part of the GSP implementation. In what actual time frame will this data gap be addressed and what agency will update and provide this data?
159 water interactions and mapping analysis of Groundwater Dependent Ecosystems (GDEs) "Groundwater supports a variety of ecosystems including springs, rivers, lakes, meadows, and wetlands, as well as trees and shrubs that tap into groundwater through deep roots (called phreatophytes). Many of these groundwater dependent ecosystems (GDEs) have small footprints on the landscape, but outsize ecological, economical, and cultural importance — they provide water storage and purification, store carbon, provide recreational and economic benefits, many of them are considered sacred to indigenous peoples, and they provide habitats to a wealth of species, As water demands for agriculture, mining, energy development, and potable water uses continue to increase, understanding the potential impacts of groundwater withdrawals on these ecosystems can assist efforts to sustainably manage limited water resources to meet economic and livelihood, wildlife habitat, recreation and other needs. Furthermore, understanding the influence of variability in climatic conditions on groundwater dependent vegetation will enhance our ability to better tease apart effects of climate from those associated with water management." https://www.dri.edu/

172 floodplain is dependent on multiple components of the hydrologic cycle that may or may not This wording is too vague as this draft acknowledges there is a dependency.
173 have relationships to groundwater levels in the principal aquifer.
391 The Wyandotte Creek Groundwater Subbasin (Wyandotte Creek Subbasin or Subbasin) has been
392 identified by the DWR as a medium priority basin The draft keeps mentioning the Wyandotte Creek sub-basin is stable
402 In November 1996, the voters in Butte
403 County approved "An Ordinance to Protect the Groundwater Resources in Butte County." One
404 of the stated purposes of the ordinance was that "the groundwater underlying Butte County is a
405 significant water resource which must be reasonably and beneficially used and conserved for the
406 benefit of the overlying land by avoiding extractions which harm the Butte basin aquifers
407 (includes the Wyandotte Creek Subbasin), causing exceedance of the safe yield or a condition of PUBLIC DRAFT FINAL Wyandotte Creek Groundwater Subbasin GSP 2 September 9, 2021 408 overdraft." This vote by the people of Butte County needs to be on the table and addressed by all the GSAs in Butte County including the WCGSA as discussion to form the Tuscan Water District rises up. The GSA are tasked to do this work not a separate "new group."
8 In 2014, the California legislature enacted the Sustainable Groundwater Management Act
9 (SGMA) in response to continued overdraft of California's groundwater resources. SGMA
10 provides for local control of groundwater resources while requiring sustainable management of
11 the state's groundwater basins. Under the provisions of SGMA, local agencies Pay attention to this wording "local agencies", must establish
12 governance of their subbasins by forming Groundwater Sustainability Agencies (GSAs) within
13 the authority to develop, adopt, and implement a Groundwater Sustainability Plan (GSP or Plan)
14 for the subbasin. Under the GSP, GSAs must adequately define and monitor groundwater
15 conditions in the subbasin and establish criteria to maintain or achieve sustainable groundwater
16 management within 20 years of GSP adoption.
29 The purpose of the Agreement was needs to say is to create the Wyandotte Creek GSA to (1) to develop, adopt,
30 and implement a GSP for the Wyandotte Creek subbasin to implement SGMA requirements and
31 achieve the sustainability goals; and (2) involve the public and subbasin stakeholders through
32 outreach and engagement in developing and implementing the GSP. The focus of the Agreement
33 is to maximize local input and decision-making The decision making must be inclusive and a true representation of all local communities, not just the views of the few sitting on the GSA committees or swayed by financial/development interests. WE ALL NEED CLEAN WATER! and address the different water demands and
34 sustainability considerations in the urban and rural areas of the Wyandotte Creek Subbasin. PUBLIC DRAFT FINAL Wyandotte Creek Groundwater Subbasin GSP ES-2 Septmeber typo 9, 2021
35 The agreement also defines two Management Areas (MAs) within the Wyandotte Creek
36 Subbasin: Wyandotte Creek Oroville and Wyandotte Creek South. Management Area refers to
37 an area within a subbasin for which a GSP may identify different minimum thresholds,
38 measurable objectives, monitoring, and projects and actions based on unique local conditions or
39 other circumstances as described in the GSP regulations. The interests and vulnerability we all need WATER this is crucial wording of
40 stakeholders and groundwater uses in these management areas vary based on the nature of the
41 water demand (agricultural, domestic, municipal), numbers and characteristics of wells
42 supplying groundwater, and to some degree the hydrogeology and mix of recharge sources.
43 SGMA requires development of a GSP that achieves groundwater sustainability in the Subbasin
44 by 2042. Butte County needs to aim to reach and apply groundwater sustainability now, not 21 years from now as that may be too late for the health of the aquifers in our county. A pragmatic approach to achieving sustainable groundwater management requires an
45 understanding of (1) historical trends and current groundwater conditions in the subbasin, based
46 on evaluating six sustainability indicators that include groundwater levels, groundwater storage,
47 groundwater quality, land subsidence, depletion of interconnected streams, and seawater
48 intrusion and (2) what must change in the future to ensure sustainability without causing
49 undesirable results (described and defined in Chapter 3) or negatively impacting beneficial uses

50 and users of groundwater, including groundwater dependent ecosystems. This needs more detailed focus in all the GSA reports.

117 Existing Groundwater Conditions
118 Groundwater conditions in the Wyandotte Creek Subbasin are regularly monitored and are
119 described in reports produced by Butte County since 2001. These documents and other reports
120 portray a subbasin that has adequate groundwater resources to meet demands under most
121 hydrologic conditions. However, comparison of the reports illustrates how in the period between
122 their issuance, groundwater conditions have tightened, and as forces ranging from population
123 growth to climate change play out, the value of well-informed water management policies and
124 practices is likely to increase. In short, while groundwater conditions in the Subbasin remain
125 stable, maintaining this posture in the future may become less the result of a state of nature and
126 more the reward for thoughtful management. This need to be worded clearer: "for detailed planning and management."
133 storage was estimated at about 2.1 million-acre-feet (MAF) in 2018. The amount of groundwater
134 in storage has decreased by approximately 0.14 percent per year between 2000 and 2018. As
135 such, it is highly unlikely the Subbasin will experience conditions under which the volume of
136 stored groundwater poses a concern. However, the depth to access that groundwater across the
137 Subbasin may pose a concern. If the deeper wells are required to reach groundwater levels and have high fees, the smaller groundwater uses will be impacted, which is more than poses a concern.
142 Surface waters can be hydraulically interconnected with the groundwater system, where the
143 stream baseflow is either derived from the aquifer (gaining stream) or recharged to the aquifer
144 (losing stream). If the water table beneath the stream lowers as a result of groundwater pumping,
145 the stream may disconnect entirely from the underlying aquifer. Within the floodplain of the
146 Feather River there is a continuous saturated zone that connects the shallowest aquifer to the
147 river. The connectivity between shallow and deeper aquifer zones will dictate the overall
148 connectivity to the River. In the upland areas outside of the Feather River floodplain, there are
149 creeks that flow seasonally and dry up in late summer or are dry for an entire year during dry
150 conditions. Ruddy Creek has been studied and has been determined to be a perennial stream, fed by groundwater. It does not completely dry up and has water in it in the middle of August 2021 in the current extreme drought! The statements included in this draft plan have to be detailed and accurate, not just general statements without current data. In this case, the upland creeks may not be influenced by "high groundwater
151 connectivity" and the presence of an undesirable result is not clear cut with respect to surface
152 water depletion. The streams dry up regardless of the groundwater condition, Ruddy Creek has been studied and has been determined to be a perennial stream, fed by groundwater. It does not completely dry up and has water in it in the middle of August 2021 in the current extreme drought! The statements included in this draft plan have to be detailed and accurate, not just general statements without current data.and streams that
153 are already dry are not considered interconnected surface water. However, the upland streams are
154 an important source of recharge to the aquifer, so the health of these stream channels and their
155 adjacent riparian zones is important to groundwater sustainability. This has been identified as a
156 data gap and will be addressed This data gap must not exist in the draft plan, to really provide part of the GSP implementation.
171 The Wyandotte Creek Subbasin acknowledges that overall function of the riparian zone and
172 floodplain is dependent on multiple components of the hydrologic cycle that may or may not May or may not is a non- statement, the draft must be clearer.
173 have relationships to groundwater levels in the principal aquifer
181 within 20 years. The sustainability goal for the Wyandotte Creek Subbasin is:
182 to ensure that groundwater is managed to provide add the word 'maintain' a water supply of adequate quantity
183 and quality add the word: clean to support beneficial users of groundwater including but not limited to rural
184 areas and other communities, the agricultural economic base of the region, and
185 environmental resource uses add : environmental groundwater dependent ecosystems and habitats, as it is worded it infers only human use. in the Subbasin now and in the future.

193 4. Significant and unreasonable degraded water quality. The development planning to allow subdivision polluted runoff waters to discharge into Ruddy Creek will degrade the groundwater quality within the Wyandotte Groundwater Basin and these very plans drainage plans are currently in process.
271 Data needed to develop the SMCs for interconnected surface waters includes definition of stream
272 reaches and associated priority habitat, streamflow measurements to develop profiles at multiple
273 time periods, and measurements of groundwater levels directly adjacent to stream channels, first
274 water bearing aquifer zone, and deeper aquifer zones. These data are not available and are a data PUBLIC DRAFT FINAL Wyandotte Creek Groundwater Subbasin GSP ES-9 Septmeber 9, 2021 (typo)
275 gap for the GSP. All stream and environmental dependent ecosytem data gaps are unacceptable in these draft reports. The studies need to be required and completed to provide this current information. If not for the environment we would not have a groundwater system to use the water from! Further evaluation of this SMC is needed to avoid undesirable results to aquatic
276 ecosystems and GDEs.

633 Smaller local or ephemeral add: and perennial streams entering and traversing the subbasin include add: Ruddy Creek, North Honcut
634 Creek, Wyandotte Creek, Wyman Ravine and numerous unnamed waterways. If these streams and waterways have a name, the names need to be included in this draft.
659 surface water diversions from the Feather River. SSignificant numbers of rural residents and
660 ranchettes depend on groundwater typically from relatively shallow domestic wells This is why the statements on line 136 &137 are crucial, important and concerning interspersed
661 with agricultural land uses.

747 6. Improve stream bank stability and protect riparian resources. This is an important point that needs to be addressed, considering the current effort to develop within the watershed, wetlands and historic riparian banks of streams within the Wynadotte Creek Sub-basin.

764 • W-P2.9: Applicants for new major development projects, as determined by the 765 Department of Development Services, shall demonstrate adequate water supply to meet 766 the needs of the project, including an evaluation of potential cumulative impacts to
767 surrounding groundwater users and the environment. I do not see this actually happening with current new major developments proposed by the City of Oroville planning dept within Thermalito in the Wyandotte Creek sub-basin.

772 • W-P3.2: Groundwater transfers and substitution programs The point of the GSA is not to arrange groundwater transfers shall be regulated to protect
773 the sustainability of the County's economy, communities and ecosystem, pursuant to
774 Chapter 33 of the Butte County Code.
775 • W-P3.3: The County shall protect groundwater recharge and groundwater quality when
776 considering new development projects. I do not see this happening regarding the stream Ruddy Creek within the Wydandotte Creek Sub-basin.

798 The Oroville City Council adopted the Oroville 2030 General Plan in June 2009. In March 2015,

799 the City Council adopted a targeted update to the 2030 General Plan referred to as the "Oroville 800 Sustainable Code Updates," The maps included with the Oroville General Plan do not show or name streams and creeks.

833 • "South Feather Water and Power Agency supplies water to the eastern and southern 834 portions of the City and SOI." The agency has approximately 171,500-thousand-acre feet 835 of storage capacity "sourced from the South Fork of the Feather River and from the Yuba 836 River system, and is stored in reservoirs at Little Grass Valley, Sly Creek, Lost Creek, 837 Ponderosa, Miner's Ranch, and Lake Wyandotte. South Feather Water and Power 838 Agency delivers approximately 28,000 TAF of water annually and has the capacity to 839 treat approximately 14.5 MGD." The South

Feather Water and Power Agency has four annexation applications currently (Oct 2021) before LAFCO to provide potable water in more areas for up to 74+ acres. If approved by LAFCO, the figures in this draft will not be accurate.

867 • Action A6.1: Conduct a study of using reclaimed wastewater for irrigation of public
868 landscaping and for agriculture. This poses an environmental & health issue and potential groundwater contamination.

869 • Policy P8.6: Implement all necessary measures to regulate runoff from urban uses to
870 protect the quality of surface and groundwater. There are plans to drain new development runoff waters into Ruddy Creek within the Wyandotte Groundwater sub-basin, there is no known oversight plan to test or continuously monitor these runoff waters.
884 "Water quality is intimately tied to water supply, since adequate uncontaminated flows
885 significantly mitigate the presence of contaminated flows, through dilution, flushing and general
886 availability of alternate sources." Water quality is more greatly discussed in the Public Safety
887 and Services Element of the General Plan, however, there are still relevant goals, policies, and
888 actions discussed in this element relevant to surface and groundwater.
889 Relevant Goals, Policies, Actions relating to water quality is provided below:
890 • Goal OPS-11: Protect water quality and quantity in creeks, lakes, natural drainages, and
891 groundwater basins. State what agency is going to do this?
892 • Policy P11.1: Maintain the natural condition of waterways and flood plains to ensure
893 adequate groundwater recharge and water supply where feasible, given flood control
894 requirements.
895 • Policy P11.2: Minimize impermeable paving that negatively impacts surface water runoff
896 and groundwater recharge rates.
PUBLIC DRAFT FINAL Wyandotte Creek Groundwater Subbasin GSP 15 September 9, 2021
897 • Policy P11.3: Protect surface and groundwater resources from contamination from runoff
898 containing pollutants and sediment, through implementation of the Central Valley
899 Regional Water Quality Control Board's (CVRWQCB) Best Management Practices.
Can this report state what agency or city, county dept is going to do this?

900 • Action A11.1: Create a comprehensive mapping of groundwater resources in the
901 Planning Area based on existing groundwater management studies and maps and, where
902 necessary, new groundwater mapping studies to result in comprehensive coverage of the
903 Planning Area. Can this report state what agency or city, county dept doing these new studies and where are the reports and what dates were they done?

1129 5. Employ a variety of outreach methods that make public participation accessible and
1130 that encourage broad participation. There need to be more outreach and holding the meetings in the middle of the day limit participation for the working folks. There is no reason not to send an all department announcement to all Butte County staff, to send notices to local colleges and schools, specifically to the environmental departments of the colleges. To share communications with fellow small and large farmers, recreation agencies and water interest public groups and environmental interest groups that most likely would have interest in participating. There are community radio stations that have free community calendar announcement, besides news channels. Information about the GSA planning and meetings need to posted in all 6 Butte County Libraries with advance notice. (not like 2 days before)
1129 5. Employ a variety of outreach methods that make public participation accessible and
1130 that encourage broad participation.
1131 6. Respond to public concerns. If the public offers information, feedback or input it must be valued and not brushed aside or commented on in a biased manner.
1132 7. Provide accurate and up-to-date information. This is exactly why data gaps are not appropriate.
1133 8. Create public value and use GSA resources wisely by managing communications and

1134 engagement in a manner that is resourceful and efficient. Add: and timely, with advance public notifications and board and staff will practice active listening to the public.
1140 Wyandotte Creek Subbasin. Their interest may be related to GSA activities, GSP development
1141 and implementation, and/or water access and management in general .
1144 implementation of the GSP. These include, but are not limited to:
1145 • General public
1146 • Agricultural users of water
1147 • Domestic well owners
1148 • Municipal well operators
1149 • Public water systems
1150 • Land use planning agencies
1151 • Environmental users of groundwater
1152 • Surface water users
1153 • The federal government which Federal agencies? The US Army Corps of Engineers? California Fish and Wildlfie?
1154 • California Native American tribes (which actual tribes for Butte County, CA)
1155 • Disadvantaged communities and historically underrepresented groundwater users
1156 (including those served by private domestic wells or small community water systems).
To really present sustainability goals of this draft: where are the comments and concerns of theses groups from table 1:1
Environmental and Ecosystem groups as the purpose is to create a sustainable plan
21. Regional agencies: Butte County Resource Conservation District
22. Federal and State agencies: CDFW
23. Environmental groups: Butte Environmental Council, The Nature Conservancy
Purpose: Inform and involve to sustain a vital ecosystem
1181 1.8.4.2 Public Engagement Opportunities
1182 There were a number of different meetings at which the public had the opportunity to engage
1183 during the GSP development process: Due to the global Covid pandemic, access for public involvement has been limited especially if one is not computer/internet saavy. As a interested member of the public I suggest paper announcements be posted and outreach be made available at all six Butte County public libraries and CSU and Butte College, Community Centers in all towns and the Oroville Adult Education Center too. A Social Media presence would get the word out as well.

1306 2.1.2.2 Soils

I think it is important to use all data resources to include updated environmental information for this WCGSA draft I have attached documentation to my public comments email that Thompsonflat Oroville Complex and Wilsoncreek Trainer Loam soils are also present within the Wyandotte Creek Groundwater Sub-basin. Please include these soils in this draft. I have attatched reference sources.

1464 2.1.7 Principal Aquifers and Aquitards More detailed information on the aquifers in the Wynadotte Creek subbasin must be included in this draft. Where is the mention of the two aquifers adjacent to Ruddy Creek One that is zero to twenty feet and the other that goes to about 300 feet below ground level? I have attached a document with references.

Do to length of this final draft I will pause here and submit these public comments.

Kathy Brazil

K Brazil, Email, Sun 10/24/2021 9:43 PM

Here are photos taken of Ruddy Creek at Biggs Ave on 0ct 24 2021 I am sending these as public comment for the next WCGSA committee meeting on Nov 4th. Please add these photos as current data for the draft .As the photos show it is a live groundwater dependent ecosystem that is part of recharging the groundwater in the Wyandotte Groundwater Basin.





K Brazil, Email, Sun 10/24/2021 9:43 PM





Sent from my iPad

APPENDIX 1-F

Comments to the Draft 2027 Groundwater Sustainability Plan and Responses

Wyandotte Creek
GROUNDWATER SUSTAINABILITY AGENCY

(530) 552-3591 • 308 Nelson Avenue, Oroville, CA 95965 • WyandotteGSA@gmail.com

TECHNICAL MEMORANDUM

To: Wyandotte Creek GSA

From: Larry Walker Associates

Date: November 5, 2026

Subject: Wyandotte Creek Subbasin: 2027 GSP 5-Year Periodic Evaluation and Plan Amendments Public Comments Summary

---

1 Background

Under the Sustainable Groundwater Management Act (SGMA), Groundwater Sustainability Agencies (GSAs) must periodically review and update their Groundwater Sustainability Plans (GSPs) as needed. The Wyandotte Creek GSA's Draft 2027 Periodic Evaluation and Plan Amendments were posted for a 30-day public review period which ended on September 30, 2026. This technical memorandum summarizes the comments.

2 Overview of Comments

The GSA received comment from one member of the public. Nearly all comments centered on Ruddy Creek, a waterway flowing from the Thermalito Forebay to the Feather River, and the claim that it is being omitted or under-documented as an Interconnected Surface Water (ISW) / Groundwater Dependent Ecosystem (GDE) in the Wyandotte Creek GSA's Periodic Evaluation and Plan Amendments. Ruddy Creek is shown on Figures 6-5 and 4-4 of the Period Evaluation and Plan Amendments, respectively. Specific comments included:

- Install a stream gage in Ruddy Creek near the intersection of Feather Ave and Biggs Ave.
- Conduct in-person, multi-season field studies for GDE determination along Ruddy Creek.
- Include Ruddy Creek on official GSA maps.
- Incorporate USFWS / Army Corps of Engineers data.
- Disclose water-demand impacts from nearby new subdivisions and industrial projects.
- Evaluate water quality after sediment / runoff events near Ruddy Creek.
- Increase public engagement by changing meeting times and through additional outreach.

- Provide equal monitoring priority for Wyandotte Creek Subbasin compared to other Butte County basins.

A copy of the public comments are provided in Attachment A.

3 Requested WAC Recommendations

It is requested that the WAC provide a recommendation to the GSA Board of Directors to proceed with the adoption and submittal of the 2027 Plan Amendments and Periodic Evaluation.

Attachment A: 2027 Periodic Evaluation and GSP Amendments Public Comments

View results

Respondent

1 Anonymous

08:17

Time to complete

1. Name *

Kathy Brazil

2. Email

fewzil@att.net

3. Comment About Periodic Evaluation *

Please add this to the public comment of the Wyandotte GSA information collection. There has been outreach for public comment and ongoing stakeholder input on the GSA in Butte County, CA. Ruddy Creek flows from the Thermalito Forebay to the Feather River, it hosts a variety of aquatic plants and oak trees and wildlife.
As you can see from these photos of Monkey flowers growing right now in real time in the waterway of Ruddy Creek that there need to be further in person scientific studies of Ruddy Creek as the "likely not a GDE" is very concerning when one is properly documenting GSA waterways of Butte County. A quick internet search came up with this result : In Butte County do monkey flowers grow in groundwater dependent ecosystem streams?

Yes, monkey flowers absolutely grow in groundwater-dependent ecosystem (GDE) streams and are very common in Butte County.
The specific variety you are looking for is the Seep Monkey Flower (Erythranthe guttata, formerly Mimulus guttatus). This bright yellow wildflower thrives exactly where groundwater discharges directly into the land surface, such as creek banks, wetlands, and the understory of riparian areas. Because GDEs rely on a steady supply of shallow groundwater to sustain their plant communities, they offer the perfect, constantly moist environment that Seep Monkey Flowers require. They are highly widespread throughout California's waterways, including the streams flowing down from the foothills into the Sacramento Valley in Butte County.

I wonder if the ESA staff need to do a physical walk of Ruddy Creek as it flows through the Wyandotte GSA rather than remote desktop research alone. A field study through all the seasons in 2026 is warranted to update data on this waterway. I believe Ruddy Creek is a GDE of the Wyandotte GSA and it must be recorded properly to fill any current data gaps that exist. The U.S. Fish and Wildlife staff may also have data on Ruddy Creek as well as the Army Corp of Engineers. I look forward to the accurate maps documenting Ruddy Creek as it flows within the Wyandotte GSA that I have heard are forthcoming. Thank you for your time.
Kathy
image001.jpg
image002.jpg

image003.jpg

View results

Respondent

2 Anonymous

02:51
Time to complete

1. Name *

Kathy Brazil

2. Email

fewzil@att.net

3. Comment About Periodic Evaluation *

I am submitting this as I do not know if it was accepted as public comment previously

I am forwarding this public comment for the Wyandotte Board GSA meeting to assure it is received because I am not sure why comments to the Wyandotte GSA are now directed to the City of Oroville ?
KB

Begin forwarded message:

From: Kathy Brazil <fewzil@att.net>
Date: September 24, 2025 at 9:23:34 AM PDT
To: publiccomment@cityoforoville.org
Subject: Public Comment Wyandotte Creek Groundwater Sustainability Agency Special Board Meeting Agenda Date: Thursday, September 25, 2025
Reply-To: Kathy Brazil <fewzil@att.net>

I am writing a public comment to address the agenda item 3.2 Wyandotte GSA data gaps.
As a member of the public I have been communicating in the Wyandotte GSA meetings since 2021 and I have submitted information and documentation about Ruddy Creek that flows within the Wyandotte GSA sub basin.
I have asked for Ruddy Creek to be included in the maps of the Wyandotte GSA and I believe there are Data Gaps in relation to the GSA/County knowledge of Ruddy Creek and it's interconnectedness to the groundwater of the Wyandotte GSA sub basin.
I am asking that the Ruddy Creek be a part of the efforts to address the data gaps by putting stream gages in Ruddy Creek, specifically between Feather Ave and at the Biggs Ave bridge in Thermalito.
I also see the statement in the paragraph below in your reports stating engage the public, well yes, I am the public and I have been trying to be engaged with the Wyandotee GSA meetings. I would also consider myself an interested party, yet I'm not sure what that means? Let's address the data gaps in 2025 about Ruddy Creek and it's role in the Wyandotte GSA as it flows through a FEMA floodplain within the Wynadotte GSA and floodplains are also known to replenish groundwater sub basins. In your efforts to address data gaps, please put in stream gages in Ruddy Creek, but be prepared to find them after it floods.
K Brazil

3.2. *Consideration of Amendment No. 2 to Sub-recipient Agreement with Butte County for Grant Administration, Project Management, and Technical Assistance

COMPONENT 2: DATA GAPS AND REFINEMENTS –
Component 2 consists of installing monitoring sites and dedicated monitoring equipment to expand the understanding of basin conditions and address data gaps related to groundwater conditions, shallow monitoring and stream gages, domestic well database, and Groundwater Dependent Ecosystems (GDEs). Activities will be coordinated with neighboring subbasins. Tasks also include modifying the GSP in response to the DWR Determination letter, refining and developing an approach to the interconnected surface water SMC, completing the Periodic

Evaluation and conducting an Outreach Program through the GSA to engage the public and stakeholders as the GSP is amended, data gaps are filled, and projects and management actions progress. Component progress will be shared with the public and stakeholders through meetings of the Wyandotte Creek GSA and communications to the subbasin's interested parties list

View results

Respondent

3 Anonymous

05:23
Time to complete

1. Name *

Kathy B

2. Email

fewzil@att.net

3. Comment About Periodic Evaluation *

I sent this as a previous public comment, yet I am not sure what comments were actually recorded as addresses to send public comments have not been consistent.
I am writing a public comment to address the agenda item 3.2 Wyandotte GSA data gaps.
As a member of the public I have been communicating in the Wyandotte GSA meetings since 2021 and I have submitted information and documentation about Ruddy Creek that flows within the Wyandotte GSA sub basin.
I have asked for Ruddy Creek to be included in the maps of the Wyandotte GSA and I believe there are Data Gaps in relation to the GSA/County knowledge of Ruddy Creek and it's interconnectedness to the groundwater of the Wyandotte GSA sub basin.
I am asking that the Ruddy Creek be a part of the efforts to address the data gaps by putting stream gages in Ruddy Creek, specifically between Feather Ave and at the Biggs Ave bridge in Thermalito.
I also see the statement in the paragraph below in your reports stating engage the public, well yes, I am the public and I have been trying to be engaged with the Wyandotee GSA meetings. I would also consider myself an interested party, yet I'm not sure what that means? Let's address the data gaps in 2025 about Ruddy Creek and it's role in the Wyandotte GSA as it flows through a FEMA floodplain within the Wynadotte GSA and floodplains are also known to replenish groundwater sub basins. In your efforts to address data gaps, please put in stream gages in Ruddy Creek, but be prepared to find them after it floods.
K Brazil

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Component 2 consists of installing monitoring sites and dedicated monitoring equipment to expand the understanding of basin conditions and address data gaps related to groundwater conditions, shallow monitoring and stream gages, domestic well database, and Groundwater Dependent Ecosystems (GDEs). Activities will be coordinated with neighboring subbasins. Tasks also include modifying the GSP in response to the DWR Determination letter, refining and developing an approach to the interconnected surface water SMC, completing the Periodic Evaluation and conducting an Outreach Program through the GSA to engage the public and stakeholders as the GSP is amended, data gaps are filled, and projects and management actions progress. Component progress will be shared with the public and stakeholders through meetings of the Wyandotte Creek GSA and communications to the subbasin’s interested parties list

Amendment to contract Greater Than $25,000.00 Butte County General Services Department Rev. 4-29-22 Page 4 of 9

View results

Respondent

4 Anonymous

03:19
Time to complete

1. Name *

Kathy B

2. Email

fewzil@att.net

3. Comment About Periodic Evaluation *

I am looking for the correct mapping of the Wyandotte GSA that includes and shows Ruddy Creek as it flows from the Thermalito Forebay to the Feather River. I have submitted documentation of Ruddy Creek as a part of the Wyandotte Creek GSA and I have yet to see it on the map on your website

View results

Respondent

5 Anonymous

01:32
Time to complete

1. Name *

Kathy Brazil

2. Email

Fewzil@att.net

3. Comment About Periodic Evaluation *

September 28 2026

Here are my Public Comments in bold for the
The Wyandotte Creek GSA's Draft 2027 Periodic Evaluation and Plan Amendments

WYANDOTTE CREEK SUBBASIN
Periodic Evaluation/Draft

Page 9
installing new stream gages;
Public Comment: Has a stream gage been installed in the interconnected surface waters of Ruddy Creek that flows in a FEMA floodplain through the Wynadotte Creek GSA from the Thermalito Forebay to the Feather River (albeit underground.ie: aquifer)

Page 12
positive trend is influenced by the wet and above normal
Hydrologic conditions experienced in WY 2023 to 2025, which resulted in increased natural recharge,
Public Comment: Yes the flows of Ruddy Creek create natural recharge as a GDE in a floodplain

Page 13
1.5.1 Stakeholder and Public Engagement
• Outline stakeholder engagement efforts.
• Provide a high-level summary of public comments received during Groundwater Sustainability Plan
(GSP) implementation and PE preparation.
Public Comment: Where are the public comments included in this draft?

page 15
Updated Groundwater
Dependent Ecosystem Desktop
Analysis
Public Comment: Is the Environmental Science Associates the only agency that conducted the GDE determination? Why? Was it solely on desktop analysis and not year round field studies i.e.: Ruddy Creek flows? Has the US Fish and Wildlife Dept. data been collected to determine GDE within this area?

page 16
Water Quality Sampling from
North Region Office Collected
January 2025
Public Comment: Was water quality samples taken from the interconnected surface waters of Ruddy Creek when sediment new development runoff waters entered the creek in Spring 2026 within the Wyandotte Creek GSA? (see previously submitted photo)

Page 21
The 2027-2032 implementation period will continue to collect data for improved
characterization of GDEs and ISWs. The 2032 PE will assess if the current groundwater level
SMCs are protective of GDEs and ISWs
Public Comment: Asking again if more in person environmental staff field studies & agencies are being utilized to accurately determine GDE, i.e.: Ruddy Creek

page 22
Current conditions of water quality are limited to results collected over the evaluation period, between WY 2022 to WY 2025 (February 1, 2022, through September 30, 2025).
Public Comment: "Limited results" it seems that this water quality analysis needs to be expanded to include more time and include inter-connected surface waters of creeks & streams that provide natural recharge to the Wyandotte Creek GSA subbasin.
Page 25
source contaminants are managed and regulated through a variety of other programs by the Regional Water Quality Control Board, DTSC, and the EPA. Through coordination with existing agencies, the Wyandotte Creek GSA will know if existing regulations are being met,...
The GSA will continue to track and communicate as needed to stay engaged with these other regulatory programs to monitor any groundwater quality issues and any
Public Comment: I question if the recent Spring 2026 sediment contamination of the waters of Ruddy Creek within the Wyandotte Creek GSA subbasin by a City of Oroville approved development has been addressed by the Wyandotte Creek GSA and what actions were taken. (see previously submitted photo)

Salinity is the only water quality constituent for which sustainable management criteria are set
Public Comment: I wonder why this states it is the only water quality sustainable criteria.

upwelling from deep portions of the aquifer, where sediment has an ancient marine origin.
Public Comment: This is a very important point worthy of further study and discussion by the Wyandotte Creek GSA and outside environmental agencies.

View results

Respondent

6 Anonymous

01:30

Time to complete

1. Name *

Kathy Brazil

2. Email

Fewzil@att.net

3. Comment About Periodic Evaluation *

Page 26
In the amended GSP, the network uses a select group of groundwater level wells and satellite-based InSAR data. SMCs are based on the InSAR data and groundwater level data is used to determine if any observation of subsidence is natural or from groundwater pumping within the Subbasin.
Public Comment: Again to achieve full sustainability efforts the consideration of projected water needs must be included as new subdivision developments and industrial projects i.e.: Biomass Plants are planned within and adjacent to the Wyandotte Creek GSA this subbasin.

The Subbasin continues to experience no significant subsidence (Error! Reference source not found.).
Public Comment: Hmmm? Where is the source for this statement?

Page 29
Should subsidence occur, the InSAR data is compared to the nearby groundwater level data to assess for any trends.
Public Comment: I ask if subsidence does occur what is the sustainable action plan.

page 32
The GSA has expanded its network of stream gages and groundwater wells near streams but needs additional time to collect data to further characterize the system and address data gaps. The GSA intends to further evaluate this SMC for the next periodic evaluation to avoid undesirable results to aquatic ecosystems and in-stream GDEs.
Public Comment: With the Wyandotte Creek GSA public outreach effort, have the submitted public comments and previously submitted photos since 2021 of the waterway of inter connected surface GDE of Ruddy Creek been included yet in this five year periodic evaluation? Has a stream gage been installed in Ruddy Creek as it flows through a FEMA floodplain within the Wyandotte Creek GSA.
Reference point of the flows of Ruddy Creek
"Key Hydrologic Functions
• Water Storage: Floodplains act as natural sponges or reservoirs that slow down and store excess water during heavy rains.
• Groundwater Recharge: Standing and moving water on the floodplain sinks into the ground, raising the local water table and feeding the stream during dry periods.
• Energy Reduction: Flat surfaces and native plants slow down fast-moving floodwaters, which protects downstream areas from severe erosion.
• Natural Filtration: Soils and plants trap harmful nutrients, sediments, and pollutants before water flows back into the main channel"

Page 33
The streamflow gage network has also been expanded through collaboration with neighboring agencies and installing new gages with SGM Implementation Grant Program funding. New data and monitoring sites have been incorporated into Sections 3.8, 4.6, 3.3, and 4.2 of the amended GSP. Additionally, new ISW results from the Butte Basin Groundwater Model (BBGM) have been added to Section 2.2.6 of the amended GSP. An update of groundwater dependent ecosystem delineations has been added Section 2.2.7 of the amended GSP
Public Comment: Again has a stream gage been installed in Ruddy Creek and have multiple outside agencies with in person field studies been involved in determining the GDEs that are

within the Wyandotte Creek GSA?

Corrective Action 5c: Prioritize collaborating and coordinating with local, state, and federal regulatory agencies as well as interested parties to better understand the full suite of beneficial uses and users that may be impacted by pumping induced surface water depletion within the GSA's jurisdictional area. GSA Response: The GSA is collaborating with the County, DWR, Northern California Water Association, neighboring subbasins, and stakeholders regarding beneficial uses and users. Public meetings have been held to discuss the perspective of all beneficial users and uses. In addition, GSAs in the region are coordinating in the Northern Sacramento Valley on best approaches to evaluate ISWs in streams along shared boundaries, including the Feather River. GSA staff and their technical consultants have worked across subbasins to develop a workplan for regional coordination and collaboration to address the depletions of interconnected surface

View results

Respondent

7 Anonymous

02:30
Time to complete

1. Name *

Kathy Brazil

2. Email

Fewzil@att.net

3. Comment About Periodic Evaluation *

Page 33
The streamflow gage network has also been expanded through collaboration with neighboring agencies and installing new gages with SGM Implementation Grant Program funding. New data and monitoring sites have been incorporated into Sections 3.8, 4.6, 3.3, and 4.2 of the amended GSP. Additionally, new ISW results from the Butte Basin Groundwater Model (BBGM) have been added to Section 2.2.6 of the amended GSP. An update of groundwater dependent ecosystem delineations has been added Section 2.2.7 of the amended GSP
Public Comment: Again has a stream gage been installed in Ruddy Creek and have multiple outside agencies with in person field studies been involved in determining the GDEs that are within the Wyandotte Creek GSA?

Corrective Action 5c: Prioritize collaborating and coordinating with local, state, and federal regulatory agencies as well as interested parties to better understand the full suite of beneficial uses and users that may be impacted by pumping induced surface water depletion within the GSA's jurisdictional area. GSA Response: The GSA is collaborating with the County, DWR, Northern California Water Association, neighboring subbasins, and stakeholders regarding beneficial uses and users. Public meetings have been held to discuss the perspective of all beneficial users and uses. In addition, GSAs in the region are coordinating in the Northern Sacramento Valley on best approaches to evaluate ISWs in streams along shared boundaries, including the Feather River. GSA staff and their technical consultants have worked across subbasins to develop a workplan for regional coordination and collaboration to address the depletions of interconnected surface water sustainability indicator in the Sacramento Valley (ISW Workplan).

Public Comment: Have new subdivision and industrial businesses water needs been evaluated and disclosed in this Periodic Evaluation report as many plans are in place since the Wyandotte Creek GSA was formed?
As for public meetings the Wyandotte Creek GSA meetings have minimal public participants.
Since the Feather River is included, in depth studies need to be completed. There seems to be less Butte County focus/priority since this Wyandotte Creek GSA is joined with the Yuba County into the Feather River Corridor.

Page 36
Contribution to Achieving Sustainability: The TWSD increased the capacity of the water treatment plant serving the city of Oroville and surrounding area. By treating a greater volume of water for the area, the amount of groundwater pumped for drinking water decreased.

Public Comment: This Water Treatment plant (Ruddy Creek Pump Station/Ruddy Creek Lift Station) directly correlates to the waterway of Ruddy Creek so the omission of the data of Ruddy Creek and water hydrology of Ruddy Creek in the reports of the Wyandotte Creek GSA and this Periodic Evaluation is concerning. Why is the TWSD Treatment plant not called by its name in these reports? https://ceqanet.lci.ca.gov/2025030160

Page 36
4.3.1 Residential Water Conservation Project Realized Benefits To Date: Conservation programs have resulted in reductions in urban pumping to the order of 50.5 AF in 2022, 100 AF in 2023, and 0.2 AF in 2024. Annual water savings compared to 2021 water usage equate to roughly 150 AFY. Expected Benefits: As groundwater is the primary source of water for the region, these various conservation projects will reduce groundwater demand, allowing groundwater levels and overall storage to recover. Benefits and Impacts to Beneficial Users: Water Conservation/Efficiency, Reduction in Groundwater Demand/Reduced Pumping Contribution to Achieving Sustainability: Reduction in groundwater pumping will increase groundwater storage and reduce potential overdraft.
Public Comment: Have new subdivision and industrial businesses water needs been evaluated and disclosed in this Periodic Evaluation report, where?

View results

Respondent

8 Anonymous

00:58
Time to complete

1. Name *

Kathy Brazil

2. Email

Fewzil@att.net

3. Comment About Periodic Evaluation *

Page 37
4.4 Potential Projects This section fulfills the requirements of GSP Emergency Regulations §356.4(b): For projects and management actions that have yet to begin or are still conceptual, assess the need for those based on the current conditions and expected outcomes of the existing projects and management actions. Describe the potential timeline to get those projects and management actions implemented or what may be needed to take them from the conceptual or as-needed phase to the "shovel ready" phase.
Public Comment: And if the projects are adjacent to and will impact current residents in the Wyandotte Creek GSA what is the emergency plans to address and protect residents from increased flooding?

Page 41
The Subbasin is not in overdraft as of December 2026, therefore the GSA will continue to evaluate measures to mitigate overdraft as needed
Public Comment: Have new subdivision and industrial businesses water needs been evaluated and disclosed in this Periodic Evaluation report
representative aquifer crosssection, respectively. In general, monitoring wells screened in the Laguna Formation are representative of the shallow (or upper) aquifer zone and wells screened in the Ione Formation are representative of the deeper aquifer zone. Table 4-1 in the Amended GSP identifies which aquifer zone each monitoring well is screened within (e.g., Shallow, Deep, or Both).
Public Comment: And has the depth of the aquifer that Ruddy Creek flows through been analyzed to fill interconnected surface waters and GDE data gaps of the Wyandotte Creek GSA?

page 44
groundwater dependent ecosystems were identified as an area with significant data gaps. To address the data gap, a new desktop analysis was performed as described in the report titled "Wyandotte Creek Groundwater Subbasin Groundwater Dependent Ecosystem Analysis" conducted by Environmental Science Associates (February 2026). The GDE desktop analysis indicated that likely GDEs within Subbasin
Public Comment: Is the Environmental Science Associates the only agency that conducted the GDE determination? Why? Was it solely on desktop analysis and not year round field studies i.e.: Ruddy Creek flows? Has the US Fish and Wildlife Dept. data been collected to determine GDE within this area? Have the submitted public comments and photos submitted since 2021 of the waterway of inter connected surface GDE of Ruddy Creek been included yet in this five year periodic evaluation? Has a stream gage been installed in Ruddy Creek it seems the stream gages are heavy on only one side of the Wyandotte Creek subbasin, why?

View results

Respondent

9 Anonymous

00:32
Time to complete

1. Name *

Kathy Brazil

2. Email

Fewzil@att.net

3. Comment About Periodic Evaluation *

page 45
Table 5-1

Recharge Rivers and Streams..
Public Comment: Yes! The seasonal flooding and flows of Ruddy Creek affect the Wyandotte Creek GSA recharge

page 53
Improve the network to understand Interconnected Surface Water and impacts on GDEs - There is limited data to analyze interaction of streams
Public Comment:
If data is solely from desktop analysis and not year round field physical ground studies i.e.: Ruddy Creek flows how can it be real time and accurate. Has the US Fish and Wildlife Dept. and many other outside agencies data been collected to determine GDEs within the Wyandotte Creek GSA? Have the submitted public comments and photos submitted since 2021 of the waterway of inter connected surface GDE of Ruddy Creek been included yet in this five year periodic evaluation?

Page 54
Figure 6-1. Groundwater Dependent Ecosystems and Tributaries in Relation..to wells

Public Comment: Likely and Not Likely is a vague term from an environmental scientific perspective and why is the determination only in relation to wells, why not to the interconnected waters of creeks and rivers within the Wyandotte Creek GSA? Is the Environmental Science Associates the only agency that conducted the GDE determination via desktop analysis? Why?

page 58
6.4.1 Overview of Existing Monitoring Network The Butte County Water & Resource Conservation monitors water quality across Butte County including within Wyandotte Creek Subbasin
Public Comment: And what actions are taken if water quality is found to be poor?

Page 65
with additional stream gages, to a total of twelve stream gages
Public Comment: and has a stream gage been installed in Ruddy Creek?

five stream gages have been installed in 2026 to address this data gap, prioritizing areas near surface waters. The locations of the newly installed wells and gages were selected to: • Better monitor surface bodies with known connections to the water table, such as the Feather River and Honcut Creek, Wyman Ravine, and Wyandotte Creek. • Assess benefits of SGMA project implementation in critical watersheds, such as Wyman Ravine.
Public Comment: I do not understand why the water way of Ruddy Creek is omitted from being considered a critical watershed. Has a stream gage been installed in Ruddy Creek

View results

Respondent

10 Anonymous

00:47
Time to complete

1. Name *

Kathy Brazil

2. Email

Fewzil@att.net

3. Comment About Periodic Evaluation *

Page 66
Table 6-4. Wyandotte Creek Subbasin Surface Water Stream Gauges.
Public Comment: Again no mention of Ruddy Creek that flows from the Thermalito Forebay to the depths of the aquifer of the Feather River

Page 69
In WY 2023, the GSA adopted a property-related service fee to fund its operations and implementation costs to comply with SGMA. Additional information is available on the GSA website
Public Comment: As a Butte County taxpayer having fees go towards this Wyandotte Creek GSA I ask why the public focus is less on this subbasin then the Butte and Vina GSAs when the Wyandotte Creek GSA also lies within Butte County. As a tax payer I am concerned how my fees are benefiting this subbasin.

Page 70
8.1 Outreach and Engagement
Public Comment: The public meetings I have attended have minimal participation from actual members of the public and often happen in the middle of a week day so they make it difficult to include working people

Page 72
8.1.1 Comments and Responses

Public Comment: where the public comments included in this Periodic Evaluation and from what years are included? Are public comments from the formation of the Wyandotte Creek GSA included?

View results

Respondent

11 Anonymous

02:08
Time to complete

1. Name *

Kathy Brazil

2. Email

Fewzil@att.net

3. Comment About Periodic Evaluation *

Page 75
Recommended Corrective Action 5: The ISW well and stream gage network has been revised and expanded. The BBGM has been updated and provided new ISW results. Updated groundwater ecosystem delineations.
Public Comment: a stream gage in Ruddy Creek is needed and other environmental outside agencies are needed to accurately determine GDEs within the Wyandotte Creek GSA

Page 76
Section 2 - Basin Setting: Sections in the Basin Setting chapter have been amended with new data from the implementation period. □ The groundwater quality section (Section 2.2.4) has been revised to reflect updated groundwater monitoring and revised description of contamination plumes in the Subbasin.
Public Comment: With the proximity to the Feather River this is a critical issue of the Wyandotte Creek GSA i.e.: contamination past and future is a critical issue, especially with proposals by the City of Oroville to allow an industrial Biomass plant(s)

page 77
Attachment A. Hydrographs for ten groundwater level RMS wells
Public Comment: The study of interconnected surface waterways of creeks, streams and the Feather River need equal focus of hydrology data and studies and monitoring.

Thank you for the work you are doing to assure we do not create a depleted aquifer/groundwater issue in Butte County.
Sincerely,
K Brazil
A concerned community member

The online form does not allow a long public comment submission so I sent my public comment in multiple submissions

View results

Respondent

12 Anonymous

21:29
Time to complete

1. Name *

K Brazil

2. Email

fewzil@att.net

3. Comment About Periodic Evaluation *

I am asking as the periodic evaluation for the Wyandotte Creek GSA public comment, when and where are the comments from the Wyandotte Creek GSA about the Villages at Ruddy Creek as it's development is currently underway in 2026 within the Wyandotte Creek Subbasin and this agenda clearly states the Wyandotte Creek GSA will be asked. Are these comments included in current reports as part of the overall five year evaluation and amendment process?

From the 2020 City of Oroville agenda for the Villages at Ruddy Creek subdivision it states:

"Wyandotte Creek Groundwater Sustainability Agency: Email: WyandotteGSA@gmail.com Phone: (530) 552-3591 Address: 308 Nelson Ave. Oroville, CA 95965 The agency is responsible for sustainable groundwater within its region and will be asked to comment on the environmental document.

.Sewerage Commission Oroville Region – Sewer collection and treatment services for TSWD and City of
Oroville.
City of Oroville: General Plan Amendment, Prezone, Annexation (reorganization); Tentative Subdivision
Map and related Improvement Plans, Tree Removal, Architectural Review for Home Designs, Grading,
Encroachment Permits, Building Permits, Landscape Plans,

11. ENVIRONMENTAL SETTING:
The 28-acre (+/-) site is located at the southeast corner of 18th St and Feather Avenue in the Thermalito
area of western Oroville. The project area includes two parcels, both owned by the project applicant. The
project area also includes adjacent developed roadways, which are owned and maintained by Butte
County. Elevations on-site range from approximately 202 feet above mean sea level, near the intersection
of 18th St. and Feather Avenue, to approximately 162 feet above sea level, near Ruddy Creek. The site
topography slopes approximately 2-3% across most of site, except that slopes up to 25% are found along
an embankment that forms the floodway for Ruddy Creek along the eastern portion of the site. The site
contains grasslands, oak woodlands, and wetlands reflective of this area"

The City of Oroville references the waterway and environment of Ruddy Creek from its 2020 documents, prior to annexing the property to develop from Butte County.

The data gaps in the Wyandotte Creek GSA 2026 reports regarding Ruddy Creek as an interconnected surface water way and GDE are concerning especially since it's floodwaters recharge the groundwater and both the US Fish and Wildlife and US Army Corp of Engineers have data on Ruddy Creek that flows within the Wyandotte Creek GSA Subbasin.

View results

Respondent

13 Anonymous

05:21
Time to complete

1. Name *

K Brazil

2. Email

fewzil@att.net

3. Comment About Periodic Evaluation *

I would like to add this as a public comment when researching the waterways within the Wyandotte Creek GSA I searched looking to help provide information for the data gaps and found this when I asked:. " are seasonal creeks in butte county. ca like Ruddy Creek and its floodplains interconnected surface waterways and gde" The answer I found said:
"Yes, seasonal and ephemeral creeks in Butte County, California—including Ruddy Creek and its associated floodplains—function as both interconnected surface waters (ISWs) and groundwater dependent ecosystems (GDEs) under California environmental and water management frameworks. How they map into these categories involves specific hydrogeologic interactions and regulatory definitions:
1. Interconnected Surface Water (ISW) and Floodplain Dynamics
Under the Sustainable Groundwater Management Act (SGMA), surface waters are considered interconnected if they have a hydraulic link to an underlying aquifer.
• The Hydraulic Connection: Creeks like Ruddy Creek in Thermalito are ephemeral/seasonal. They flow primarily during winter rainfall and early spring. Even when dry on the surface, these channels sit directly atop local shallow aquifers.
• Natural Recharge: During wet periods, these creeks and their FEMA-mapped floodplains act as vital natural conduits for groundwater recharge. Water filters down through the porous creek beds to replenish the underlying basin.
• Regional Context: Regional groundwater-surface water modeling across Northern Sacramento Valley subbasins (such as the Wyandotte Creek GSA and Vina subbasin) actively tracks these streamflow-aquifer exchanges. Groundwater pumping can draw water away from these channels, meaning even seasonal creeks are tightly managed within ISW frameworks.
2. Groundwater Dependent Ecosystems (GDEs)
Even though Ruddy Creek may look completely dry for months out of the year, its ecosystem qualifies as a GDE because the plant and animal life there relies on shallow groundwater table access.
• Vegetation and Habitat: The floodplains and banks of seasonal creeks support unique riparian vegetation, wetlands, and vernal pool habitats. These plant communities depend on a high water table to survive the dry summer months.
• Jurisdictional Oversight: Local regulatory bodies, including the California Department of Fish and Wildlife (CDFW), maintain regulatory jurisdiction over these seasonal waterways. They protect them as active ecological habitats regardless of whether they have a year-round surface flow.
Summary of Environmental Concerns
Because of their sensitive status as both floodways and ecological conduits, developments impacting seasonal creeks (such as the proposed Villages at Ruddy Creek subdivision near 18th and Feather Avenue in Oroville) draw heavy scrutiny from agencies like the U.S. Army Corps of Engineers, the USFWS, and local groundwater sustainability agencies (GSAs) due to the risk of altering natural recharge and degrading GDE habitat."

APPENDIX 2-A
Historical Annual Water Budget Estimates

Appendix 2-A – Historical Annual Water Budget Estimates

This appendix contains detailed annual water budget results for the land and surface water system (**Table 2A-1**) and for the groundwater system (**Table 2A-2**).

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Table 2A-1. Historical Land and Surface Water System Water Budget, 2000-2018.

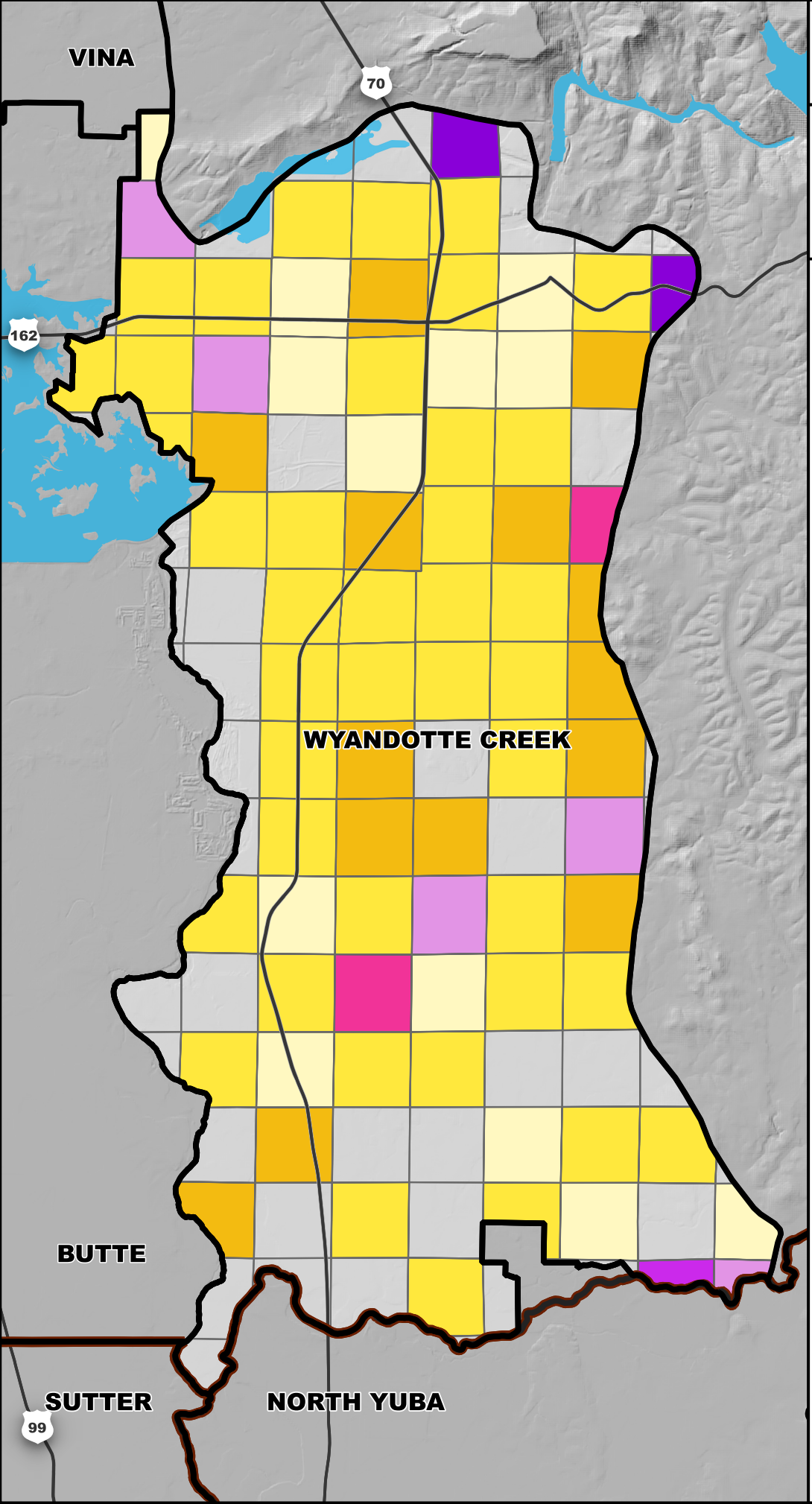
Component	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Inflows (AFY)																			
Surface Water Inflows	505,700	491,500	513,900	516,200	546,400	515,500	1,945,300	538,500	534,400	520,400	549,800	971,600	699,700	1,188,500	819,000	922,800	1,139,500	6,547,300	809,900
Outside Diversions	*5,900*	*5,900*	*6,000*	*5,900*	*6,000*	*5,800*	*5,600*	*5,400*	*5,800*	*5,700*	*5,600*	*5,400*	*5,700*	*5,700*	*5,600*	*5,700*	*5,700*	*5,600*	*5,700*
Feather River	*456,200*	*463,100*	*470,400*	*464,800*	*506,100*	*469,100*	*1,871,500*	*502,000*	*499,300*	*482,100*	*507,100*	*908,600*	*653,100*	*1,142,000*	*778,600*	*885,300*	*1,086,100*	*6,458,700*	*759,900*
North Honcut Creek	*43,100*	*22,200*	*37,200*	*45,100*	*33,800*	*40,200*	*67,500*	*30,800*	*28,900*	*32,200*	*36,500*	*56,800*	*40,400*	*40,300*	*34,400*	*31,400*	*47,000*	*81,800*	*43,700*
Precipitation Runoff	*400*	*200*	*300*	*400*	*300*	*400*	*700*	*200*	*300*	*400*	*500*	*700*	*400*	*400*	*300*	*400*	*500*	*1,100*	*600*
Applied Water Return Flows	*100*	*100*	*100*	*100*	*0*	*0*	*100*	*100*	*100*	*100*	*100*	*100*	*100*	*100*	*100*	*100*	*100*	*100*	*100*
Precipitation	137,200	101,400	123,600	151,500	126,700	153,400	210,800	91,600	104,200	111,300	140,200	197,600	111,100	110,900	79,000	93,300	126,600	205,600	108,800
Groundwater Pumping	49,700	48,000	50,000	45,500	49,200	40,400	43,800	53,200	57,300	48,900	44,600	38,900	52,700	51,600	56,900	50,900	43,000	33,300	37,600
Agricultural	*44,100*	*41,900*	*42,900*	*37,900*	*40,900*	*31,500*	*34,400*	*43,700*	*48,100*	*40,600*	*36,700*	*31,400*	*44,600*	*44,000*	*48,000*	*43,300*	*36,100*	*26,800*	*30,900*
Urban and Industrial	*200*	*100*	*400*	*200*	*200*	*500*	*1,200*	*1,100*	*1,400*	*1,000*	*700*	*1,100*	*1,200*	*1,100*	*800*	*400*	*400*	*400*	*400*
Managed Wetlands	*5,500*	*6,000*	*6,600*	*7,500*	*8,100*	*8,500*	*8,200*	*8,400*	*7,800*	*7,300*	*7,200*	*6,400*	*6,900*	*6,400*	*8,200*	*7,200*	*6,400*	*6,100*	*6,300*
Stream Gains from Groundwater	47,500	40,100	40,500	42,600	41,600	43,500	60,700	34,700	32,800	26,800	32,100	48,000	33,800	29,300	18,900	19,200	20,300	47,000	30,800
Total Inflow	***740,100***	***681,000***	***728,000***	***755,800***	***763,900***	***752,800***	***2,260,600***	***718,000***	***728,700***	***707,400***	***766,700***	***1,256,100***	***897,300***	***1,380,300***	***973,800***	***1,086,200***	***1,329,400***	***6,833,200***	***987,100***
Outflows (AFY)																			
Evapotranspiration	88,000	88,100	87,000	92,200	80,400	94,700	86,700	95,800	89,300	92,500	90,200	92,000	92,500	84,500	83,700	73,600	80,200	82,400	81,000
Agricultural	*45,300*	*45,400*	*45,900*	*44,600*	*44,000*	*40,900*	*41,900*	*48,000*	*49,300*	*46,600*	*43,800*	*41,400*	*47,600*	*46,800*	*45,000*	*39,600*	*39,900*	*38,400*	*38,200*
Urban and Industrial	*7,000*	*7,100*	*7,100*	*8,000*	*6,800*	*9,700*	*8,400*	*9,400*	*8,600*	*9,800*	*9,900*	*11,200*	*9,800*	*9,300*	*9,200*	*8,000*	*7,800*	*7,900*	*7,600*
Managed Wetlands	*4,300*	*4,600*	*5,200*	*6,400*	*6,200*	*6,900*	*6,400*	*6,800*	*5,500*	*5,900*	*5,700*	*5,400*	*5,200*	*4,900*	*5,600*	*4,500*	*4,300*	*4,400*	*4,500*
Native Vegetation	*31,400*	*31,000*	*28,800*	*33,100*	*23,500*	*37,200*	*30,000*	*31,600*	*25,900*	*30,100*	*30,800*	*33,900*	*29,800*	*23,400*	*23,900*	*21,400*	*28,100*	*31,600*	*30,700*
Canal Evaporation	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Deep Percolation	80,500	54,900	74,200	82,200	81,100	79,700	123,900	41,000	60,900	53,000	73,500	107,300	55,500	58,100	40,300	51,600	68,600	111,300	47,600
Precipitation	*54,300*	*33,600*	*48,900*	*57,800*	*52,200*	*57,900*	*91,900*	*20,800*	*34,700*	*30,800*	*50,300*	*80,500*	*31,700*	*33,100*	*19,000*	*28,800*	*47,400*	*87,900*	*32,100*
Applied Surface Water	*7,100*	*5,700*	*6,600*	*7,100*	*8,800*	*6,300*	*9,300*	*4,600*	*6,200*	*5,900*	*6,700*	*8,000*	*5,900*	*6,200*	*3,600*	*5,100*	*5,300*	*6,600*	*3,600*
Applied Groundwater	*19,200*	*15,600*	*18,700*	*17,300*	*20,000*	*15,500*	*22,700*	*15,700*	*20,000*	*16,300*	*16,500*	*18,800*	*17,900*	*18,800*	*17,700*	*17,600*	*15,900*	*16,800*	*11,900*
Seepage	7,600	7,600	8,200	8,600	8,900	7,700	14,400	9,100	8,700	9,600	9,000	9,700	9,600	10,200	9,000	9,500	10,800	23,600	8,600
Streams	*1,400*	*1,300*	*1,900*	*2,500*	*2,400*	*1,700*	*8,100*	*2,600*	*2,200*	*3,200*	*2,800*	*3,700*	*3,000*	*3,900*	*4,000*	*4,700*	*6,000*	*18,800*	*3,800*
Lakes	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*
Canals and Drains	*2,600*	*2,700*	*2,600*	*2,500*	*2,900*	*2,400*	*2,600*	*2,900*	*2,900*	*2,800*	*2,600*	*2,400*	*2,900*	*2,700*	*1,400*	*1,200*	*1,200*	*1,200*	*1,200*
Surface Water Outflows	563,300	530,300	559,100	571,600	594,300	570,500	2,036,400	571,000	571,500	551,600	593,800	1,047,200	740,500	1,225,300	842,300	951,400	1,170,100	6,616,100	849,800
Precipitation Runoff	*17,100*	*8,800*	*13,800*	*19,000*	*16,300*	*17,300*	*36,700*	*9,300*	*14,200*	*13,900*	*18,300*	*31,700*	*16,000*	*17,400*	*10,100*	*15,300*	*15,800*	*33,000*	*13,600*
Applied Surface Water Return Flows	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Applied Groundwater Return Flows	*1,800*	*1,800*	*1,700*	*1,700*	*1,800*	*1,800*	*1,900*	*1,800*	*2,000*	*2,000*	*2,000*	*1,900*	*2,100*	*2,000*	*1,700*	*1,300*	*1,200*	*1,100*	*1,000*
Streams	*3,500*	*3,300*	*3,200*	*3,100*	*3,100*	*3,300*	*3,600*	*3,800*	*4,300*	*4,000*	*4,000*	*3,500*	*4,300*	*3,700*	*3,900*	*2,200*	*2,700*	*1,700*	*1,500*
Butte Creek Diversions to Sutter	*540,900*	*516,500*	*540,400*	*547,800*	*573,100*	*548,100*	*1,994,200*	*556,100*	*551,000*	*531,700*	*569,500*	*1,010,100*	*718,100*	*1,202,200*	*826,600*	*932,600*	*1,150,400*	*6,580,300*	*833,600*
Total Outflow	***739,400***	***680,900***	***728,500***	***754,600***	***764,700***	***752,600***	***2,261,400***	***716,900***	***730,400***	***706,700***	***766,500***	***1,256,200***	***898,100***	***1,378,100***	***975,300***	***1,086,100***	***1,329,700***	***6,833,400***	***987,000***
Change in Storage (Inflow - Outflow)	***700***	***100***	***-500***	***1,200***	***-800***	***200***	***-800***	***1,100***	***-1,700***	***700***	***200***	***-100***	***-800***	***2,200***	***-1,500***	***100***	***-300***	***-200***	***100***

Table 2A-2. Historical Groundwater System Water Budget, 2000-2018.

Component	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Inflows (AFY)																			
Subsurface Inflows	26,800	26,100	27,800	27,500	27,200	24,900	25,700	25,400	25,800	25,100	25,200	25,400	24,500	23,900	24,300	23,000	21,100	21,400	21,700
Butte Subbasin	*14,800*	*15,100*	*16,800*	*17,100*	*16,900*	*15,200*	*15,700*	*15,300*	*15,800*	*16,000*	*16,300*	*16,200*	*15,100*	*14,500*	*15,100*	*14,200*	*13,100*	*13,200*	*13,000*
North Yuba Subbasin	*3,700*	*3,200*	*2,900*	*2,700*	*2,800*	*2,800*	*2,700*	*2,700*	*2,500*	*2,000*	*2,300*	*2,900*	*3,200*	*2,900*	*2,700*	*2,300*	*2,100*	*2,300*	*2,900*
Sutter Subbasin	*500*	*600*	*900*	*900*	*800*	*500*	*600*	*700*	*700*	*800*	*700*	*500*	*600*	*700*	*800*	*800*	*700*	*600*	*600*
Vina Subbasin	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Foothill Area	*7,700*	*7,200*	*7,200*	*6,800*	*6,700*	*6,400*	*6,700*	*6,700*	*6,800*	*6,300*	*5,800*	*5,800*	*5,700*	*5,700*	*5,600*	*5,700*	*5,400*	*5,400*	*5,200*
Deep Percolation	80,500	54,900	74,200	82,200	81,100	79,700	123,900	41,000	60,900	53,000	73,500	107,300	55,500	58,100	40,300	51,600	68,600	111,300	47,600
Precipitation	*54,300*	*33,600*	*48,900*	*57,800*	*52,200*	*57,900*	*91,900*	*20,800*	*34,700*	*30,800*	*50,300*	*80,500*	*31,700*	*33,100*	*19,000*	*28,800*	*47,400*	*87,900*	*32,100*
Applied Surface Water	*7,100*	*5,700*	*6,600*	*7,100*	*8,800*	*6,300*	*9,300*	*4,600*	*6,200*	*5,900*	*6,700*	*8,000*	*5,900*	*6,200*	*3,600*	*5,100*	*5,300*	*6,600*	*3,600*
Applied Groundwater	*19,200*	*15,600*	*18,700*	*17,300*	*20,000*	*15,500*	*22,700*	*15,700*	*20,000*	*16,300*	*16,500*	*18,800*	*17,900*	*18,800*	*17,700*	*17,600*	*15,900*	*16,800*	*11,900*
Seepage	7,600	7,600	8,200	8,600	8,900	7,700	14,400	9,100	8,700	9,600	9,000	9,700	9,600	10,200	9,000	9,500	10,800	23,600	8,600
Streams	*1,400*	*1,300*	*1,900*	*2,500*	*2,400*	*1,700*	*8,100*	*2,600*	*2,200*	*3,200*	*2,800*	*3,700*	*3,000*	*3,900*	*4,000*	*4,700*	*6,000*	*18,800*	*3,800*
Lakes	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*	*3,600*
Canals and Drains	*2,600*	*2,700*	*2,600*	*2,500*	*2,900*	*2,400*	*2,600*	*2,900*	*2,900*	*2,800*	*2,600*	*2,400*	*2,900*	*2,700*	*1,400*	*1,200*	*1,200*	*1,200*	*1,200*
Total Inflow	***114,900***	***88,600***	***110,200***	***118,300***	***117,200***	***112,300***	***164,000***	***75,500***	***95,400***	***87,700***	***107,700***	***142,400***	***89,600***	***92,200***	***73,600***	***84,100***	***100,500***	***156,300***	***77,900***
Outflows (AFY)																			
Subsurface Outflows	27,900	27,300	27,300	26,700	26,500	26,300	28,500	27,100	25,600	25,000	23,900	23,900	23,600	24,000	23,200	23,800	24,800	25,400	24,100
Butte Subbasin	*16,000*	*14,900*	*14,400*	*14,400*	*14,600*	*14,700*	*15,900*	*14,800*	*13,500*	*12,900*	*12,500*	*13,300*	*13,100*	*13,000*	*12,300*	*13,000*	*13,900*	*14,900*	*14,000*
North Yuba Subbasin	*10,400*	*10,900*	*11,400*	*10,800*	*10,400*	*10,000*	*10,900*	*10,900*	*10,700*	*10,800*	*9,900*	*8,900*	*9,000*	*9,500*	*9,600*	*9,600*	*9,600*	*8,800*	*8,700*
Sutter Subbasin	*500*	*500*	*400*	*400*	*300*	*500*	*400*	*300*	*400*	*200*	*300*	*400*	*400*	*400*	*200*	*200*	*300*	*300*	*400*
Vina Subbasin	*200*	*200*	*200*	*200*	*200*	*200*	*300*	*200*	*200*	*200*	*200*	*200*	*200*	*200*	*200*	*200*	*300*	*300*	*200*
Foothill Area	*900*	*900*	*900*	*900*	*900*	*900*	*1,000*	*900*	*800*	*800*	*900*	*900*	*900*	*900*	*900*	*700*	*700*	*1,100*	*700*
Groundwater Pumping	49,700	48,000	50,000	45,500	49,200	40,400	43,800	53,200	57,300	48,900	44,600	38,900	52,700	51,600	56,900	50,900	43,000	33,300	37,600
Agricultural	*44,100*	*41,900*	*42,900*	*37,900*	*40,900*	*31,500*	*34,400*	*43,700*	*48,100*	*40,600*	*36,700*	*31,400*	*44,600*	*44,000*	*48,000*	*43,300*	*36,100*	*26,800*	*30,900*
Urban and Industrial	*200*	*100*	*400*	*200*	*200*	*500*	*1,200*	*1,100*	*1,400*	*1,000*	*700*	*1,100*	*1,200*	*1,100*	*800*	*400*	*400*	*400*	*400*
Managed Wetlands	*5,500*	*6,000*	*6,600*	*7,500*	*8,100*	*8,500*	*8,200*	*8,400*	*7,800*	*7,300*	*7,200*	*6,400*	*6,900*	*6,400*	*8,200*	*7,200*	*6,400*	*6,100*	*6,300*
Stream Gains from Groundwater	47,500	40,100	40,500	42,600	41,600	43,500	60,700	34,700	32,800	26,800	32,100	48,000	33,800	29,300	18,900	19,200	20,300	47,000	30,800
Total Outflow	***125,100***	***115,400***	***117,800***	***114,800***	***117,300***	***110,200***	***133,000***	***115,000***	***115,700***	***100,700***	***100,600***	***110,800***	***110,100***	***104,900***	***99,000***	***93,900***	***88,100***	***105,700***	***92,500***
Change in Storage (Inflow - Outflow)	***-10,200***	***-26,800***	***-7,600***	***3,500***	***-100***	***2,100***	***31,000***	***-39,500***	***-20,300***	***-13,000***	***7,100***	***31,600***	***-20,500***	***-12,700***	***-25,400***	***-9,800***	***12,400***	***50,600***	***-14,600***

APPENDIX 3-A

Figures Showing Average Depth of Domestic, Irrigation, and Public Supply Wells



Wyandotte Creek Subbasin

Average Well Completion Depth by Section - Domestic

LEGEND

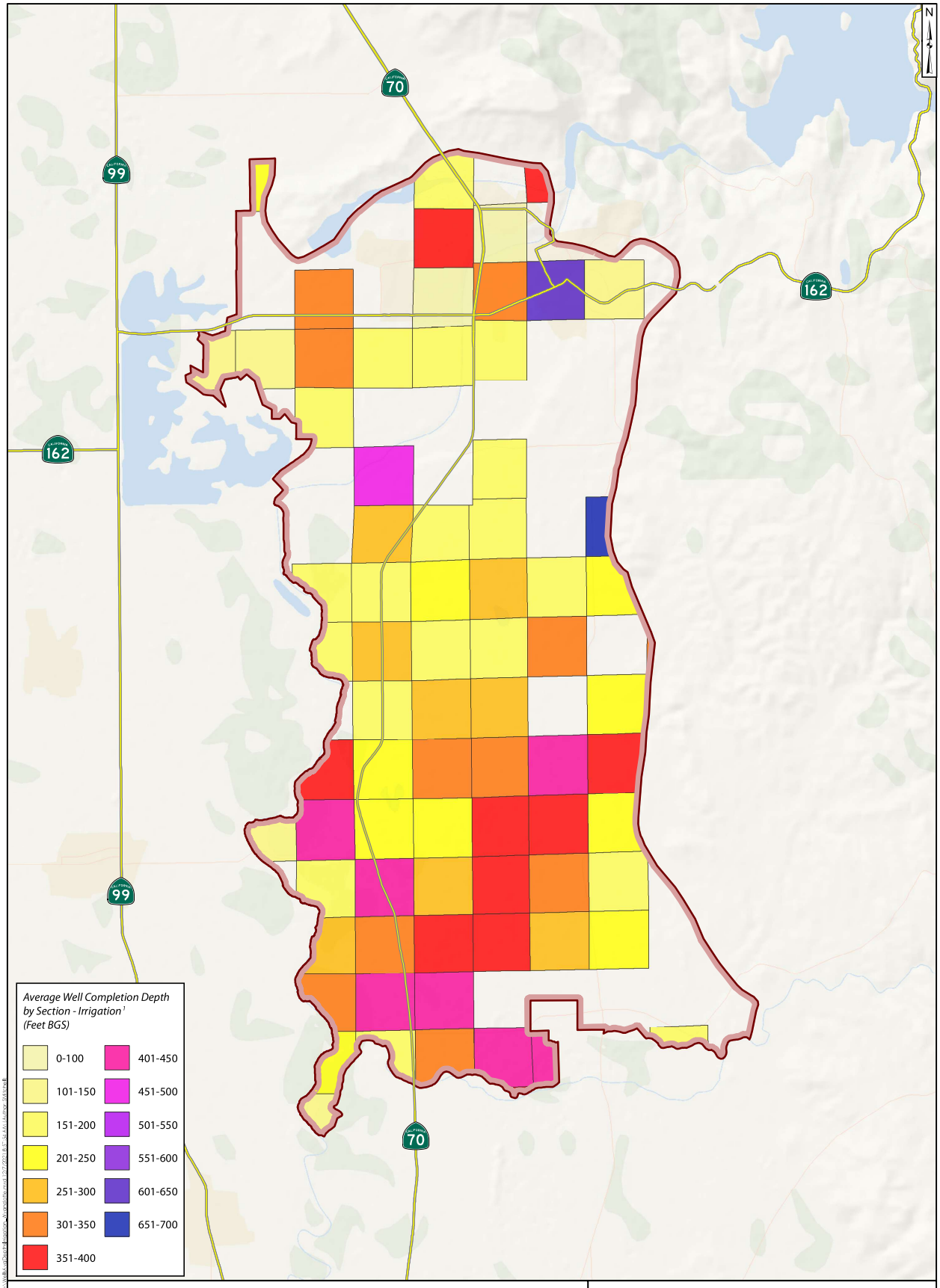
- County Line
- Subbasin Boundary
- Management Area

Average Well Depth (feet BGS)

- 1 - 100
- 100 - 150
- 150 - 200
- 200 - 250
- 250 - 300
- 300 - 350
- 350 - 400
- No Wells

0 1 2 mi

N



Legend

Wyandotte Creek Subbasin[1]

Roads[2]

Highways

2 1 0 2 Miles

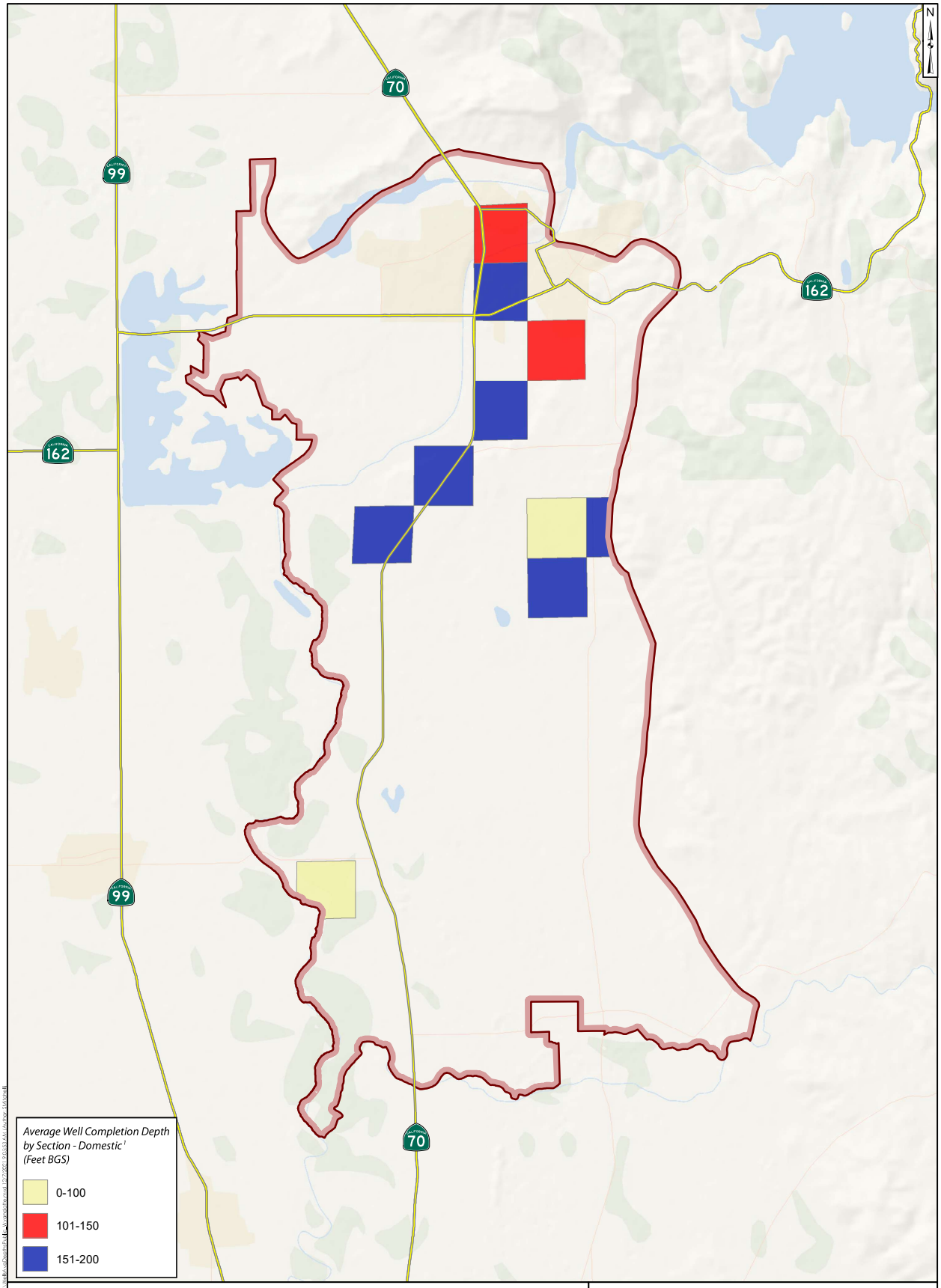
Average Completion Depth of Irrigation Wells per Section

Wyandotte Creek Subbasin GSP

Geosyntec consultants

Project No.: SAC282 | December 2021

Notes:
1) California Department of Water Resources (CA DWR).
2) TIGER/Line, U.S. Census Bureau.



Legend

Wyandotte Creek Subbasin[1]

Roads[2]

Highways

2 1 0 2 Miles

Average Completion Depth of Public Wells per Section
Wyandotte Creek Subbasin GSP

Geosyntec consultants

Project No.: SAC282 | December 2021

Notes:
1) California Department of Water Resources (CA DWR).
2) TIGER/Line, U.S. Census Bureau.

APPENDIX 3-B
GWL RMS Selection Process and Domestic Well Risk Assessment

Domestic Well Inventory

As discussed in Section 3.3.2., the domestic well risk assessment was performed to (1) address data gaps identified in the 2022 GSP, (2) quantify risks to domestic wells due to lowering groundwater levels and (3) establish new MTs for groundwater levels using the new domestic well dataset. To perform the risk assessment, the GSA's inventory of domestic wells in the Subbasin and the groundwater level RMS network had to first be updated.

To develop a functional domestic well dataset, 785 Well Completion Reports (WCRs) corresponding to a well within the Subbasin were compiled from DWR's Online System for Well Completion Reports (OSWCR). Well data, including location, installation date, perforation depths, and total completion depth, were algorithmically extracted from all 785 WCRs, and then each report was manually reviewed to verify the extracted information and extract supplementary data, if available. Through this review, an exact location was found for 61% of the domestic wells in the Subbasin. The other 39% of wells were not located and had to their location had to be assigned as the corresponding centroid of the PLSS section, a 1-mile by 1-mile area.

Lastly, for the new domestic well inventory to be useful for the risk assessment, a standard 'pump elevation', or elevation below which the well would not be able to draw water, had to be formulated. To account for differences in available information between WCRs, the pump elevation was selected as the shallower of:

A. Ten feet above the completion depth of the well.

B. The bottom of the well's deepest perforated interval.

Table 1 shows domestic wells summarized by installation date and includes a depth range for each date range.

Table 3B-1. Domestic wells by installation date

Year Installed	Number of Wells	Well Depth Range
1900 – 1969	108	25' – 440'
1970 – 1979	129	44' – 350'
1980 – 1999	287	48' – 575'
2000 – 2024	261	14' – 990'
Total:	**785**	

GWL RMS Well Selection Process

The risk assessment, to be applicable to the Subbasin, was based on the groundwater level RMS network. Prior to the risk assessment, the GSA wanted to review all possible groundwater monitoring network wells and decide if the RMS network for groundwater levels should be changed.

Data available on the water data library for each well was reviewed and the following were identified or calculated for each well:

- Measurement history
- Measurement frequency
- Measurement quality issues
- Well construction information (e.g., GSE, RPE, well depth, perforated intervals, if available)

- Minimum/maximum/average groundwater levels and trends

In addition, site visits were conducted to verify the data available online and:

- Determine if wells could be consistently accessed for measurement.
- Identify nearby surface water features.
- Confirm well use and well depth.
- Identify any other barriers to collecting consistent, high-quality measurements.

All of this collected data led the GSA to evaluate the wells on the following criteria:

1. Does the well have at least 5 years of good-quality historical data for both spring and fall?
2. Is the site consistently measured biannually, at least? If not, could the well easily be measured more often?
3. Are at least 80% of the measurements taken of good quality (i.e., no pumping, no oil problems, etc.)?
4. Do historical measurements suggest influence of nearby surface water features or underlying geologic features that may make the measured groundwater levels not representative of the general area?
5. Does the well have sufficient construction information to determine which aquifer layer the well is screened in?
6. Does the well have access problems or other barriers that would prevent taking consistent measurements at the well?
7. Would inclusion of the well in the RMS network be redundant?

If the well passes all seven of the above criteria, or is a multi-completion well and passes at least six of the criteria, then the well can be considered an RMS well. To determine whether a well would be redundant as an RMS well, wells were prioritized based on depth. If a deep well was located closely to a shallow well, the shallow well was selected to be RMS over the deep well. This analysis was performed for 16 groundwater monitoring wells in the Subbasin. Table 2 summarizes the data collected and the determination of which wells should become RMS.

Table 3B-2. Groundwater level monitoring network well RMS selection data.

SWN	MA	RMS	Nearby SW Feature	Measure-ment History (Years)	Number of Measure-ments	Percentage of Good-quality Measure-ments	Measure-ment Frequency	Aquifer Layer Class-ification	Access	Latitude	Long-itude	Total Depth (ft)	Well Use	Pump	GSE (ft)	Max WSE (ft)	Min WSE (ft)
19N03E16Q001M	Oroville	**Yes**		24	108	97%	semi-annual/ quarterly	shallow	Ask landowner	39.4977	-121.6369	120	Residential	Yes	179.32	149.92	131.32
19N04E32P001M	Oroville	**Yes**		65	210	89%	semi-annual/ quarterly	shallow	Ask landowner	39.454	-121.5503	150	Residential	Yes	187	141.3	107
CWS-03[1]	Oroville	**Yes**		46	125	99%	semi-annual/ quarterly	shallow	Confid-ential	-	-	-	Public Supply	-	-	139	88
CWS-02[1]	Oroville	No[4]		46	124	99%	semi-annual/ quarterly	both	Confid-ential	-	-	-	Public Supply	-	-	159	107
CWS-01[1]	Oroville	No[4]		46	124	100%	semi-annual/ quarterly	shallow	Confid-ential	-	-	-	Public Supply	-	-	142	85
17N03E13B002M	South	**Yes**	intermittent pond (~5')	23	58	97%	semi-annual/ quarterly	deep	GSA directed	39.3336	-121.5853	320	Observation	No[2]	89.27	79.97	42.17
17N04E22B001M	South	**Yes**	intermittent pond (~20')	48	182	92%	semi-annual/ quarterly	shallow	Ask landowner	39.319	-121.5089	80	Irrigation	Yes	117.26	108.76	33.06
18N03E25N001M	South	**Yes**		48	184	84%	semi-annual/ quarterly	shallow	Ask landowner	39.3818	-121.5916	164	Residential	Yes	127.26	80.26	46.26
18N04E08M001M	South	**Yes**		63	204	85%	semi-annual/ quarterly	deep	Ask landowner	39.4283	-121.5586	656	Irrigation	Yes	147.26	119.96	54.96
18N04E16C001M	South	**Yes**	irrigation canal (~5')	77	235	89%	semi-annual/ quarterly	both	Ask landowner	39.4239	-121.5318	165	Residential[3]	Yes	203.26	128.66	94.36
19N04E31F001M	South	**Yes**		24	116	94%	semi-annual/ quarterly	shallow	Free access	39.4606	-121.5725	200	Observation	No	259.27	148.47	107.97
18N04E19D003M	South	**Yes**		4	1270	86%	daily	both	GSA directed	39.40512	-121.5736	200	Observation (MCW)	No	122	92.311	53.24
18N04E19D002M	South	No[5]		4	1262	98%	daily	both	GSA directed	39.40512	-121.5736	570	Observation (MCW)	No	122	100.626	93.61
18N04E19D001M	South	No[5]		4	1269	86%	daily	both	GSA directed	39.40512	-121.5736	720	Observation (MCW)	No	122	105.871	101.24
17N03E03D001M	South	No[6]	Feather River (~1000')	77	256	94%	semi-annual/ quarterly	shallow	Ask landowner	39.364	-121.6328	179	Irrigation	Yes	97.27	85.27	63.27
17N04E09N002M	South	No[7]		23	94	66%*	semi-annual/ quarterly	deep	N/A	39.3387	-121.5363	325	Irrigation	Yes	102.26	87.26	39.66

1. These wells do not have state well numbers
2. Pump exists but is not operable and will not be repaired
3. DWR has this well recorded as an irrigation well
4. Rendered redundant by CWS-03
5. Rendered redundant by 18N04E19D003M
6. Not RMS due to heavy influence from Feather River
7. Not RMS due to persistent oil problems

Domestic Well Risk Assessment

With the domestic well inventory complete, the dataset could then be refined for the assessment. During the domestic well inventory, GSA staff noted that not all of the wells being identified would be relevant when developing SMC for groundwater levels. The following three assumptions were used to filter wells that would not be relevant:

1. Wells installed before 1980 were considered as passed their useful life and have likely been decommissioned, abandoned, or replaced. 237 wells were excluded from the risk assessment from this assumption.
2. Wells within a public water supplier's service area are likely not relied on for drinking water and thus not considered at-risk of lowering groundwater levels. Eight wells within Cal Water – Oroville, 25 wells within TWSD, and 135 wells within SFWPA (including newly annexed parcels) were excluded from the risk assessment from this assumption.
3. Wells with a pump elevation that is lower than the historical low of the nearest groundwater level RMS well were deemed not sustainable. 35 wells were excluded from the risk assessment from this assumption.

After filtering the domestic well dataset to account for these assumptions, 345 domestic wells remained for the risk assessment. Figure 1 shows domestic wells symbolized by installation date, with public water supplier service areas also being shown on the map. The Subbasin was then divided up into ten different 'RMS Zones', each zone corresponding to a different groundwater level RMS well, which are also shown on Figure 1. Groundwater levels at the RMS well are assumed to be roughly uniform across the zone, hence why the wells were selected as RMS.

The risk assessment considers four different groundwater levels for each RMS Zone: the groundwater surface elevation when 5% of domestic wells go dry, 10% of domestic wells go dry, 15% of domestic wells go dry, and the original MT established in the initial GSP. Results of the risk assessment are shown in Table 3. Ultimately, the 5th percentile level was chosen for Criterion 1 in the final approach for calculating groundwater level MTs. Figure 2 through Figure 10 display the groundwater levels suggested in Table 3 for each RMS Zone, as shown on the map on the following page (Figure 1). A plot was not made for CWS-03, which only contains one domestic well that meets the outlined criteria. Criterion 2 (historical minimum groundwater elevation minus 20 feet) was used for the MT for CWS-03.

Table 3B-3. Approaches considered for Criterion 1 of the groundwater level MTs and the corresponding number of dry wells and well replacement costs. Criterion 2 for determining groundwater level MTs was also considered in cases where the Criterion 2 groundwater level was deeper than the Criterion 1 groundwater level. The number of dry wells in these cases was adjusted to the Criterion 2 groundwater level.

MT Approach	Number of Dry Wells	Mitigation Cost at MTs
MTs established in 2022 GSP	53 (or 15%)	$1.59 million
5th Percentile Dry	38 (11%)	$1.14 million
10th Percentile Dry	46 (13%)	$1.38 million
15th Percentile Dry	56 (or 16%)	$1.68 million

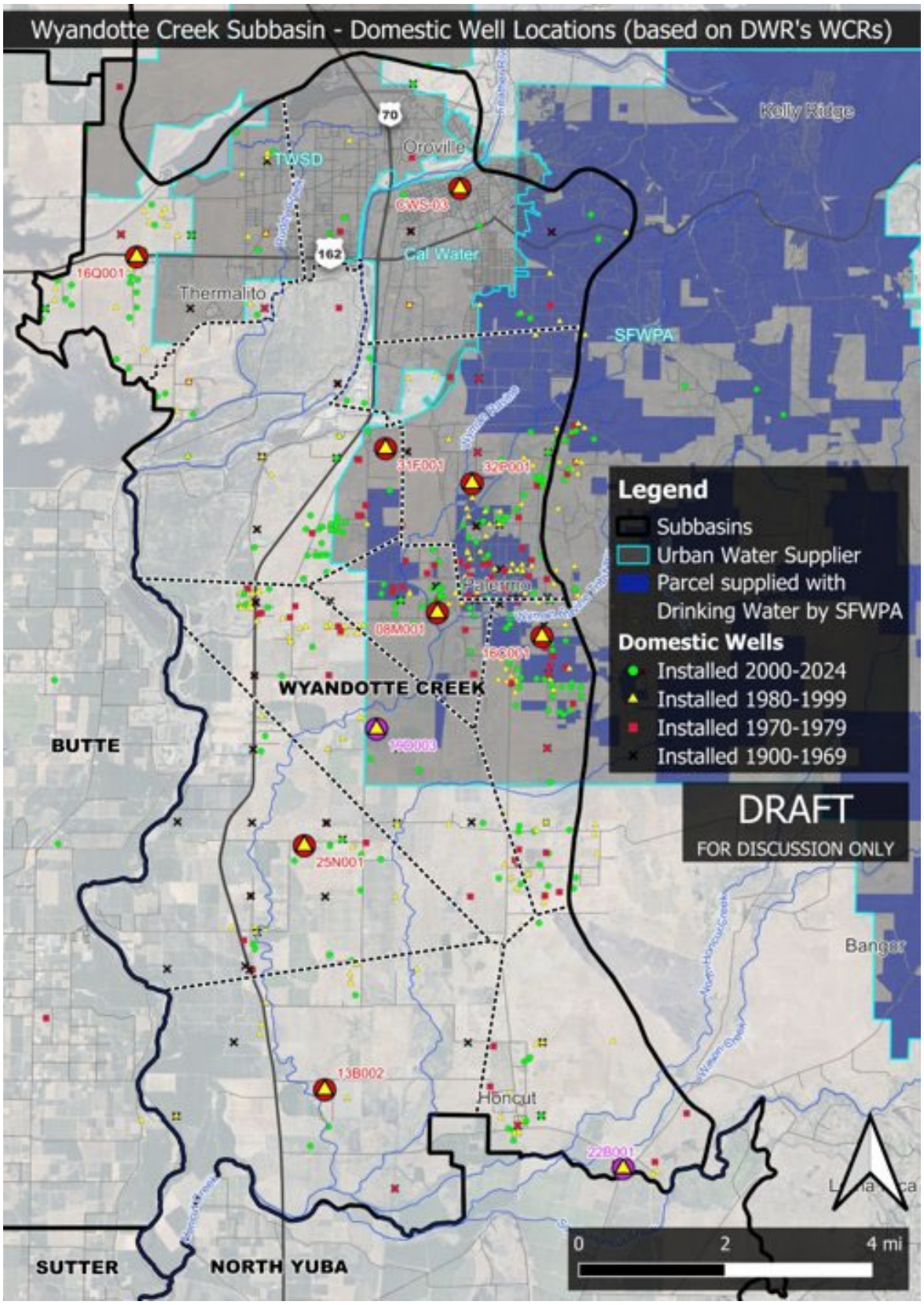


Figure 3B-1. Map of domestic wells in each RMS zone, symbolized by installation date.

RMS Zone Domestic Well Depth Charts

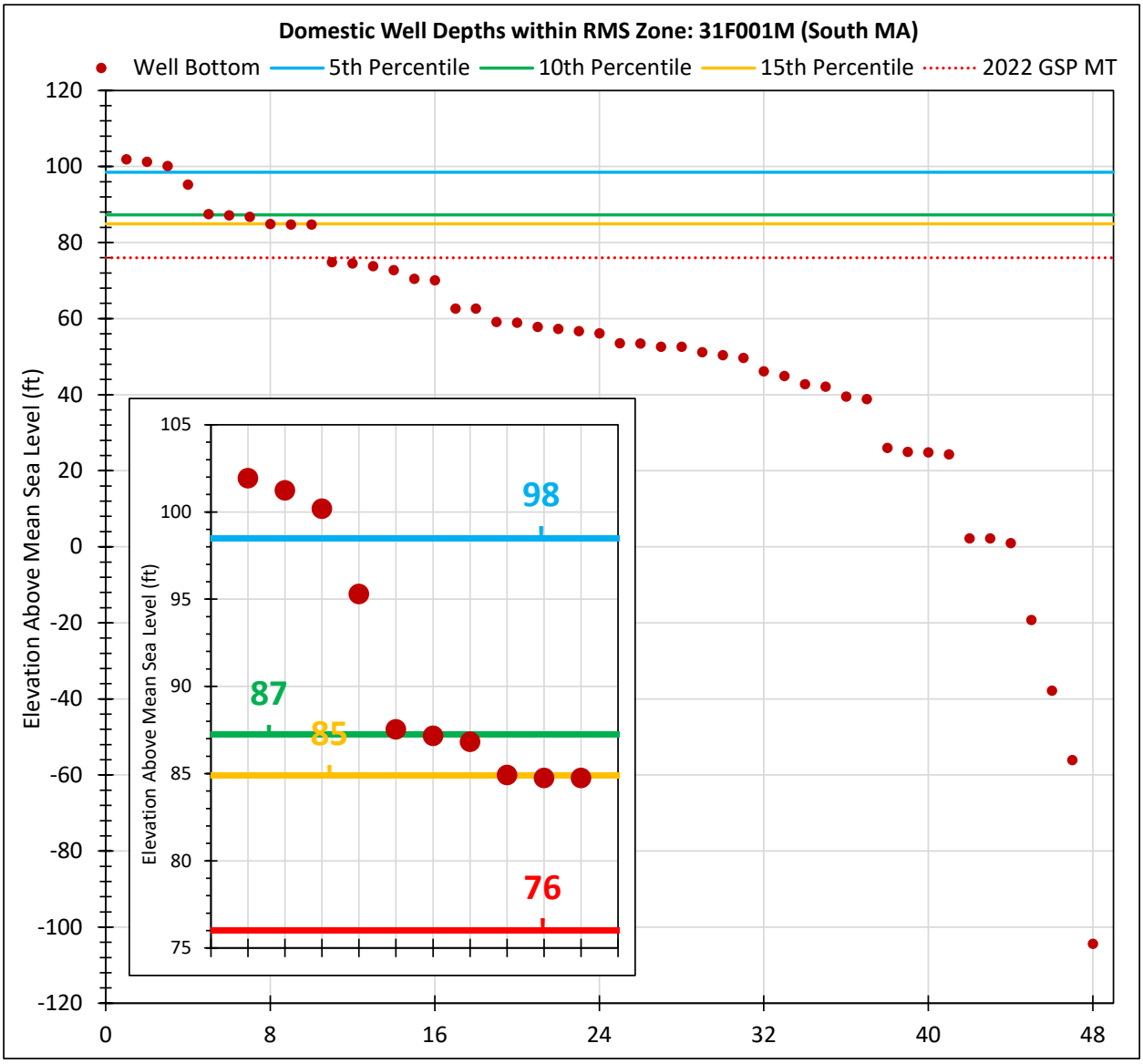


Figure 3B-2. Depths of domestic wells near RMS Well 19N04E31F001M plotted sequentially by elevation of pump; the RMS Zone contains 48 domestic wells. A zoomed-in window on the plot explicitly shows the 5th percentile, 10th percentile, 15th percentile, and prior MT groundwater levels.

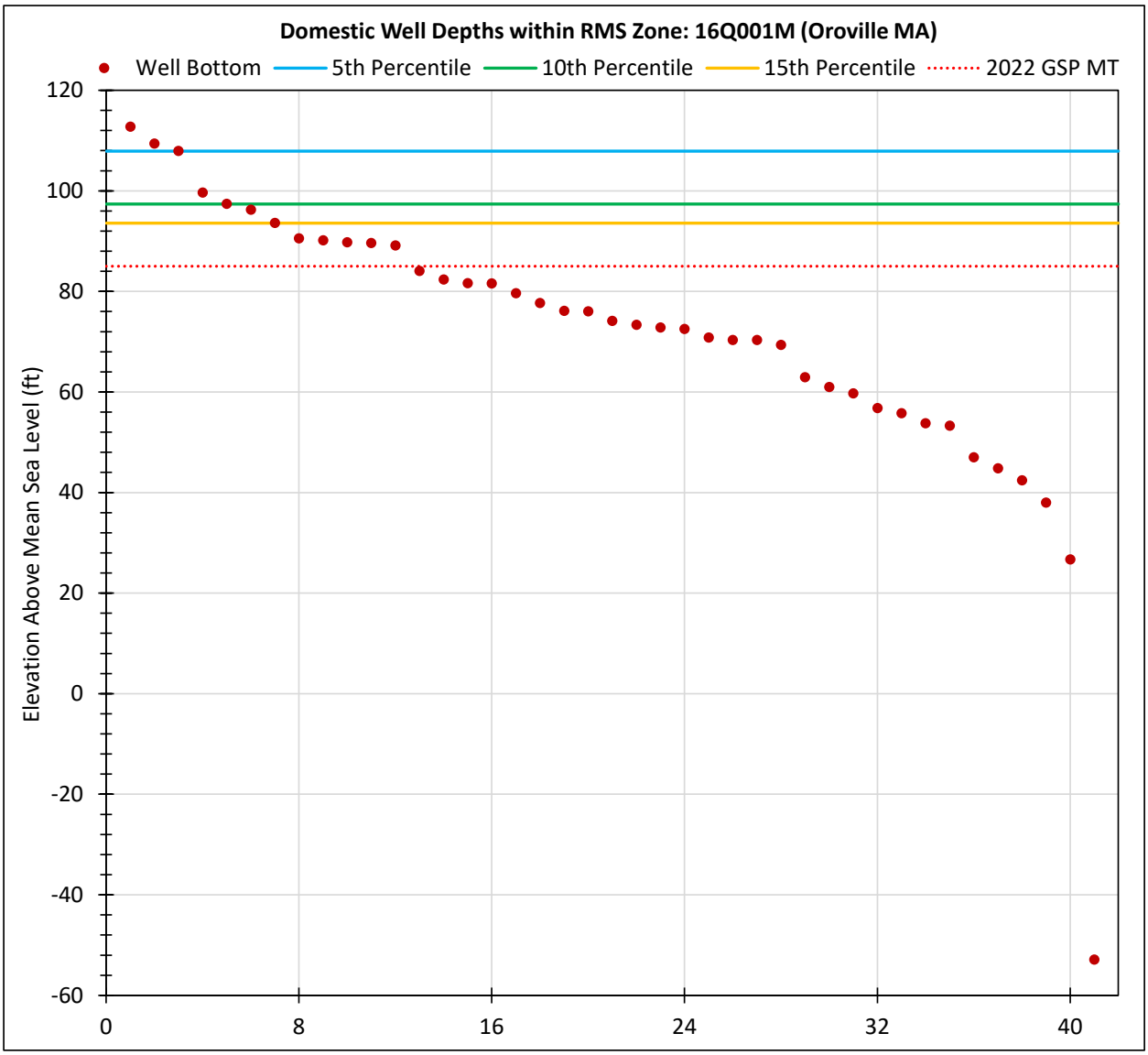


Figure 3B-3. Depths of domestic wells near RMS Well 19N03E16Q001M plotted sequentially by elevation of pump; the RMS Zone contains 41 domestic wells.

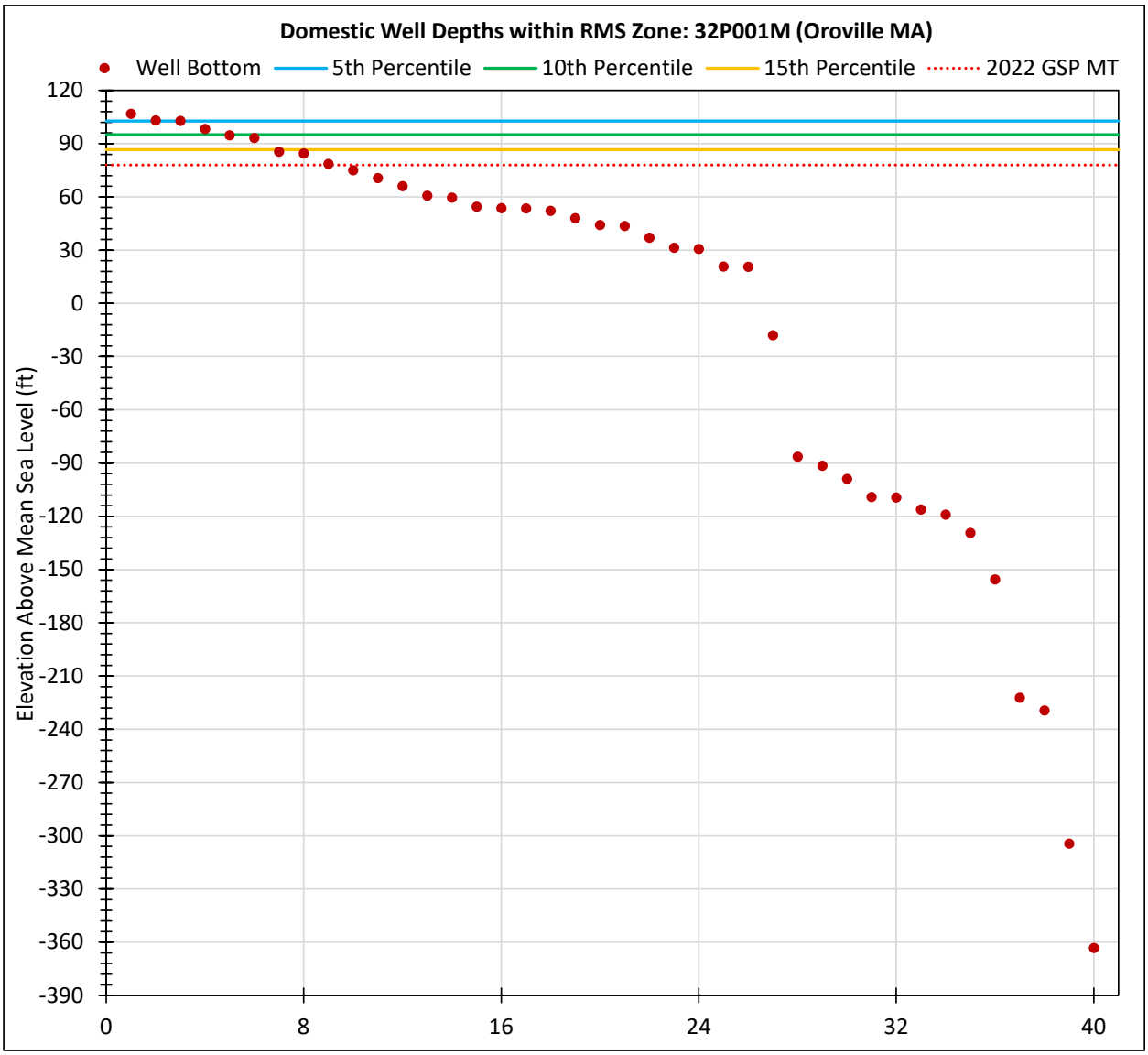


Figure 3B-4. Depths of domestic wells near RMS Well 19N04E32P001M plotted sequentially by elevation of pump; the RMS Zone contains 40 domestic wells.

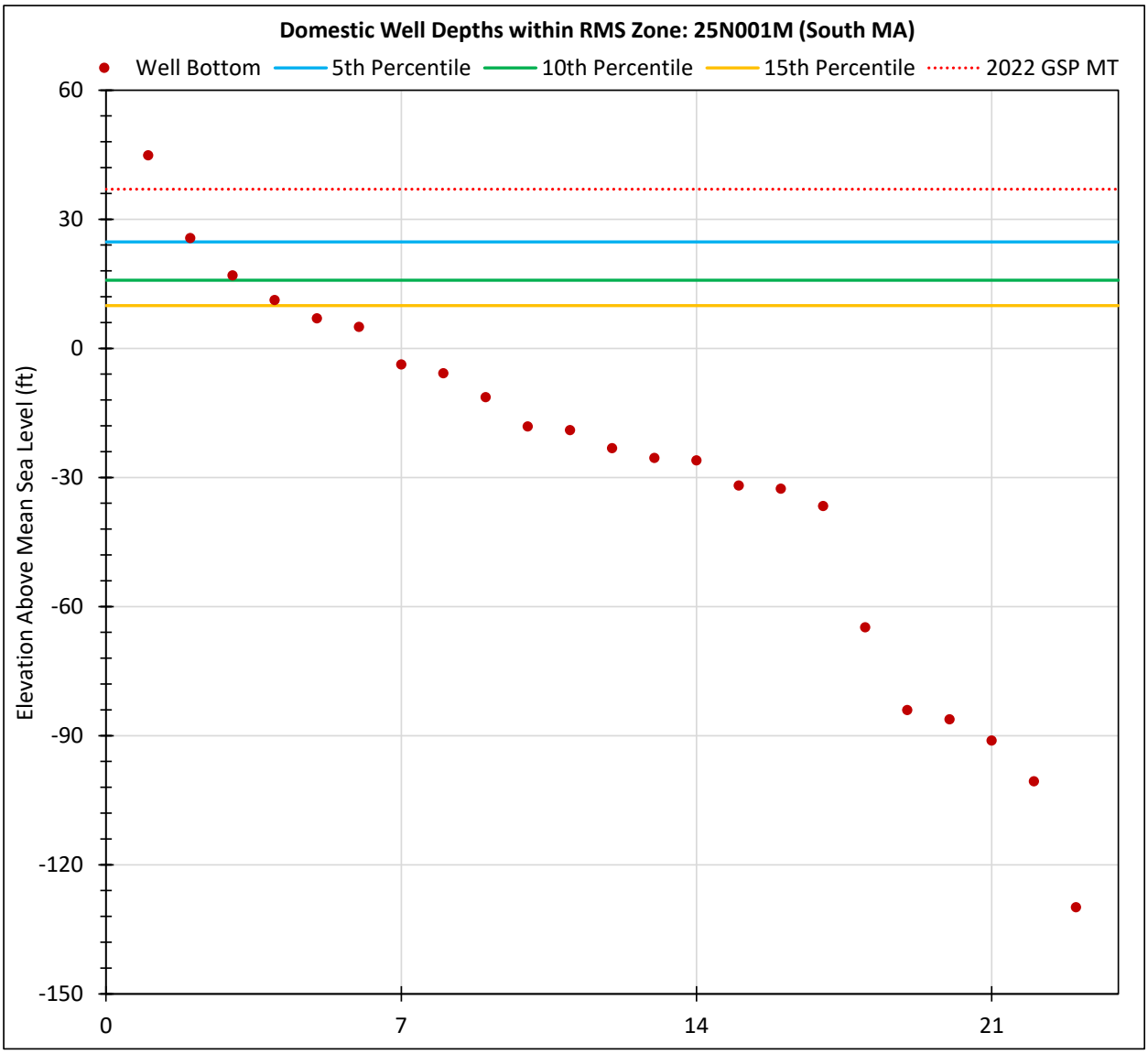


Figure 3B-5. Depths of domestic wells near RMS Well 18N03E25N001M plotted sequentially by elevation of pump; the RMS Zone contains 23 domestic wells.

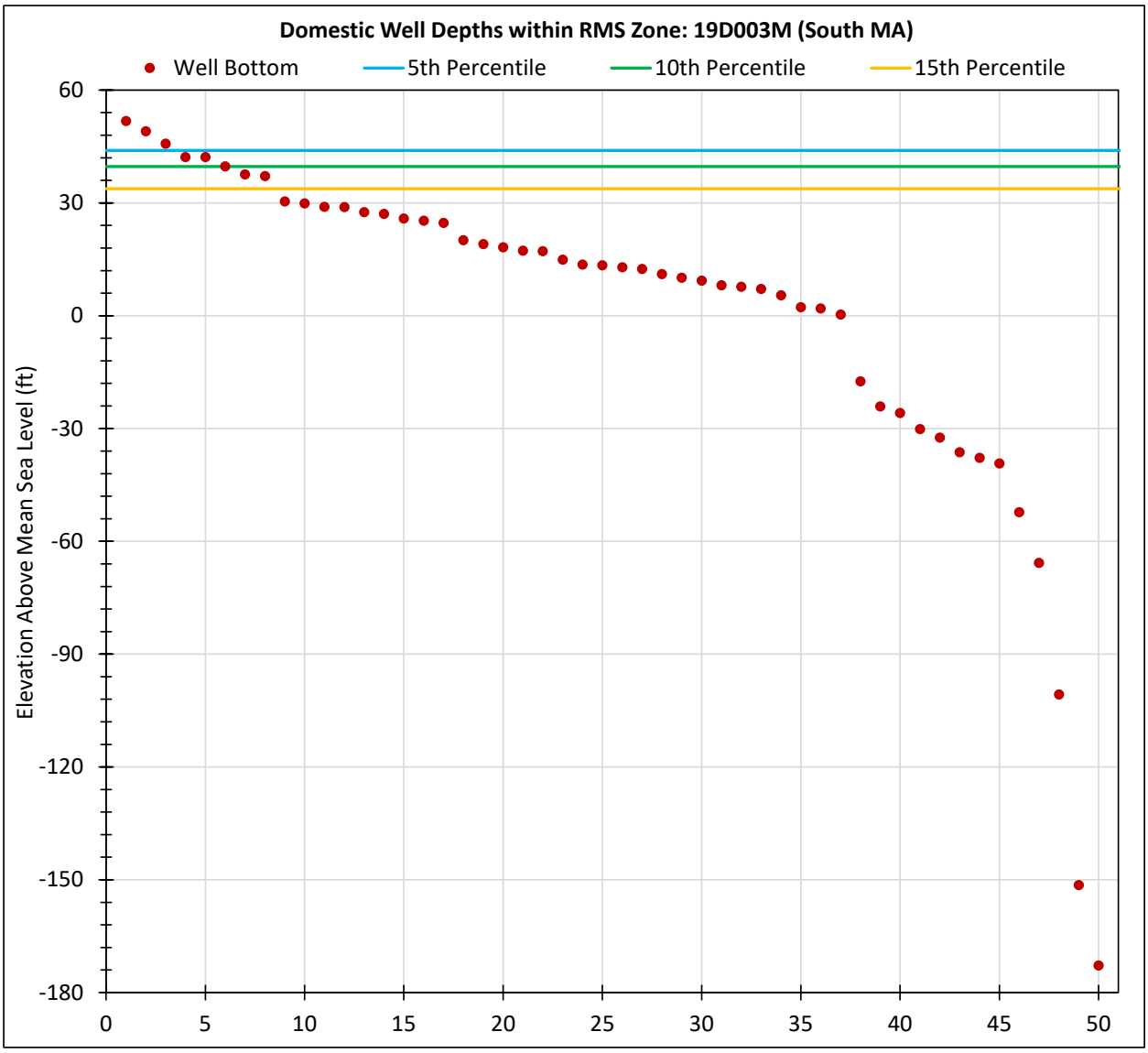


Figure 3B-6. Depths of domestic wells near RMS Well 18N04E19D003M plotted sequentially by elevation of pump; the RMS Zone contains 51 domestic wells. One well was too deep to be included on the plot, with a pump elevation of 375 feet below mean sea level.

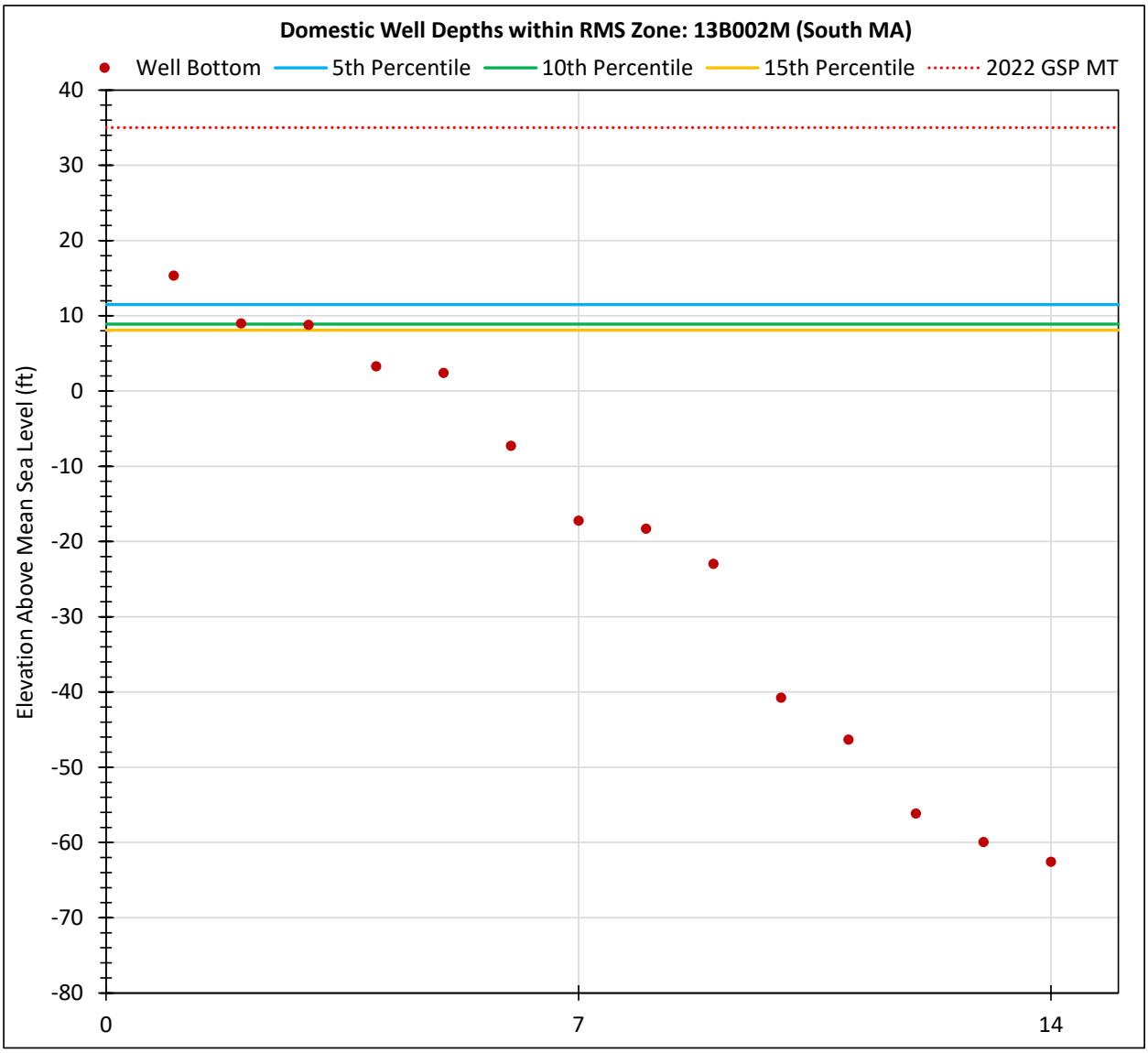


Figure 3B-7. Depths of domestic wells near RMS Well 17N03E13B002M plotted sequentially by elevation of pump; the RMS Zone contains 14 domestic wells.

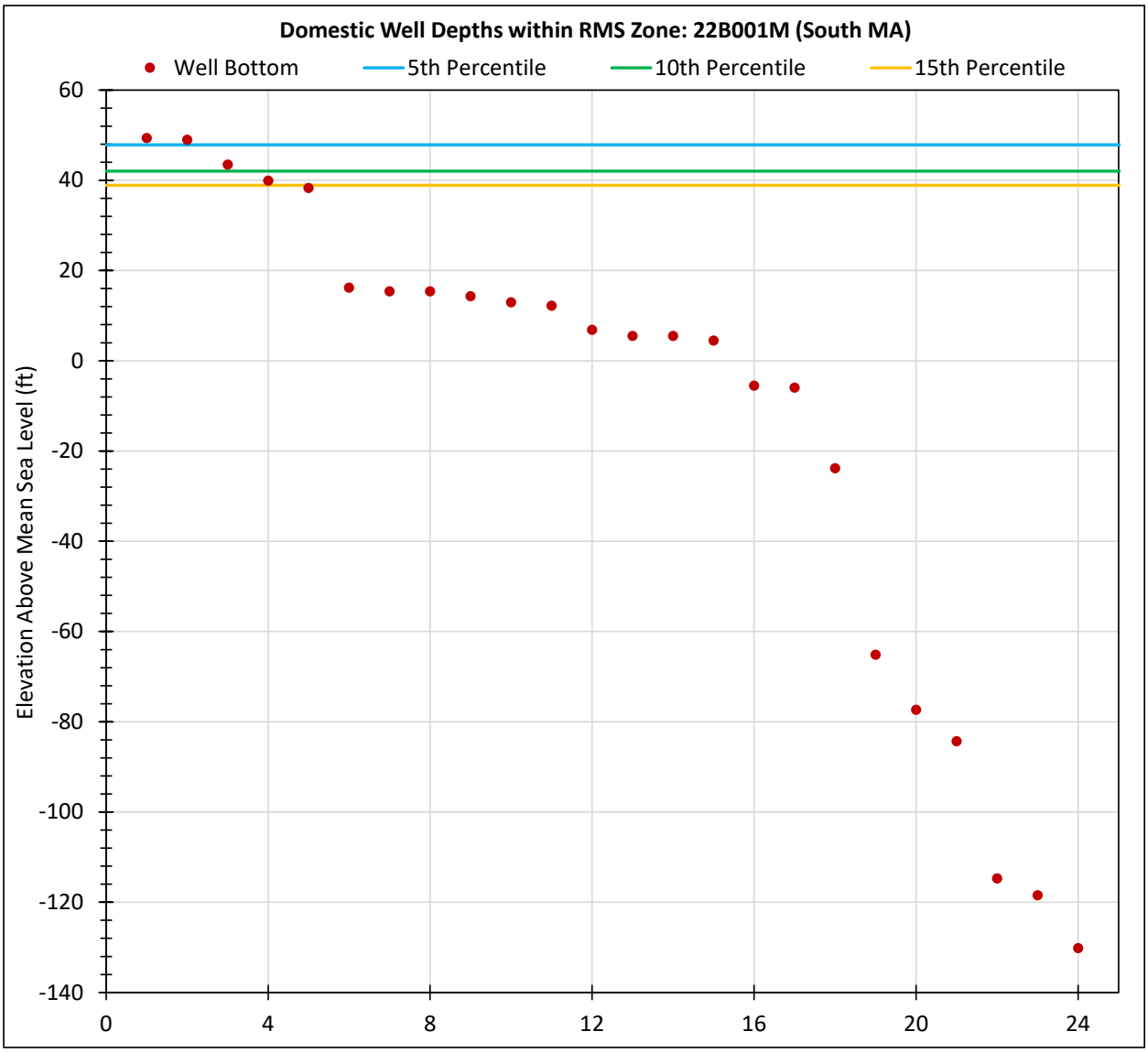


Figure 3B-8. Depths of domestic wells near RMS Well 17N04E22B001M plotted sequentially by elevation of pump; the RMS Zone contains 25 domestic wells. One well was too deep to be included on the plot, with a pump elevation of 412 feet below mean sea level.

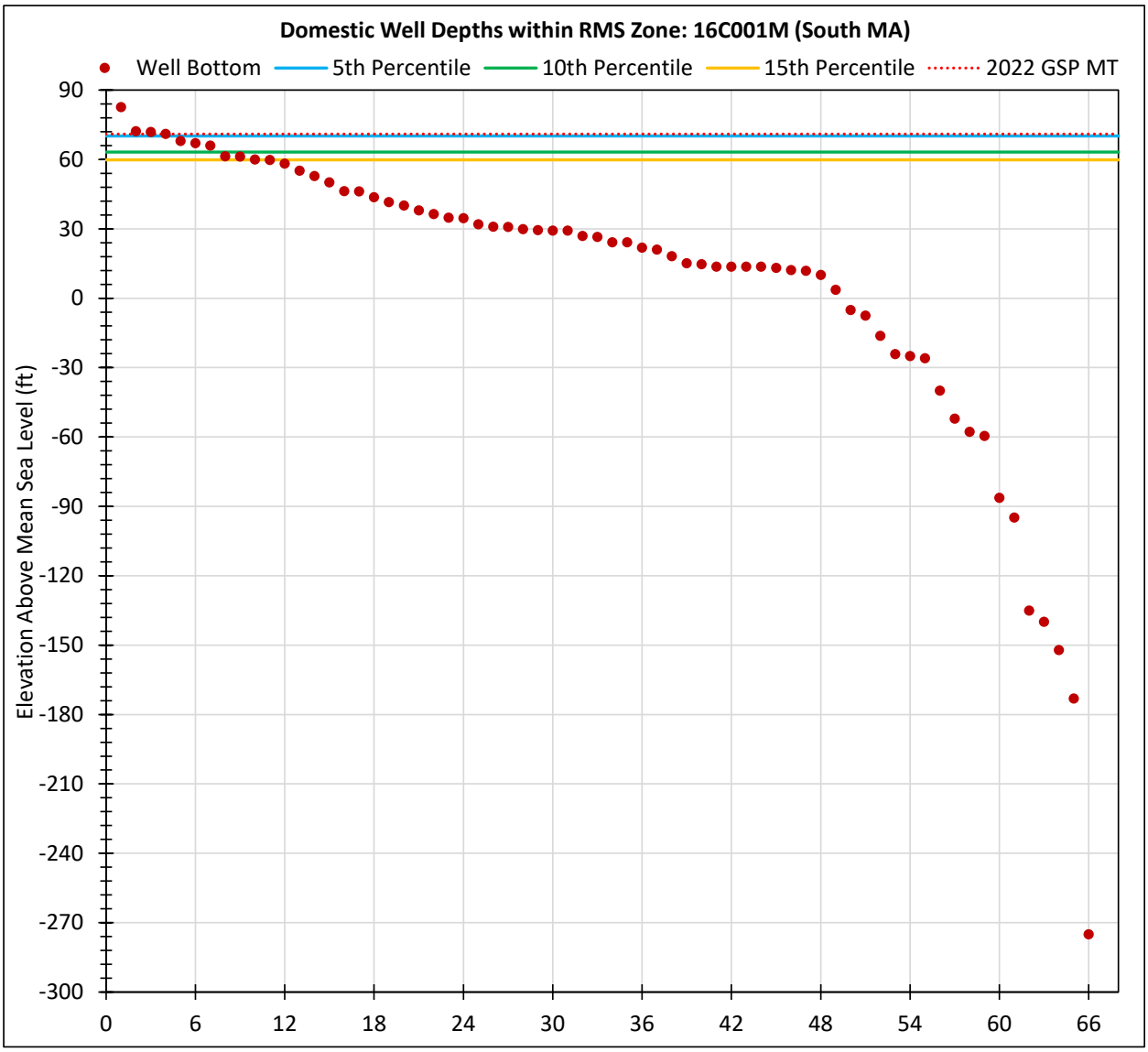


Figure 3B-9. Depths of domestic wells near RMS Well 18N04E16C001M plotted sequentially by elevation of pump; the RMS Zone contains 67 domestic wells. One well was too deep to be shown on the plot, with a pump elevation of 765 feet below mean sea level.

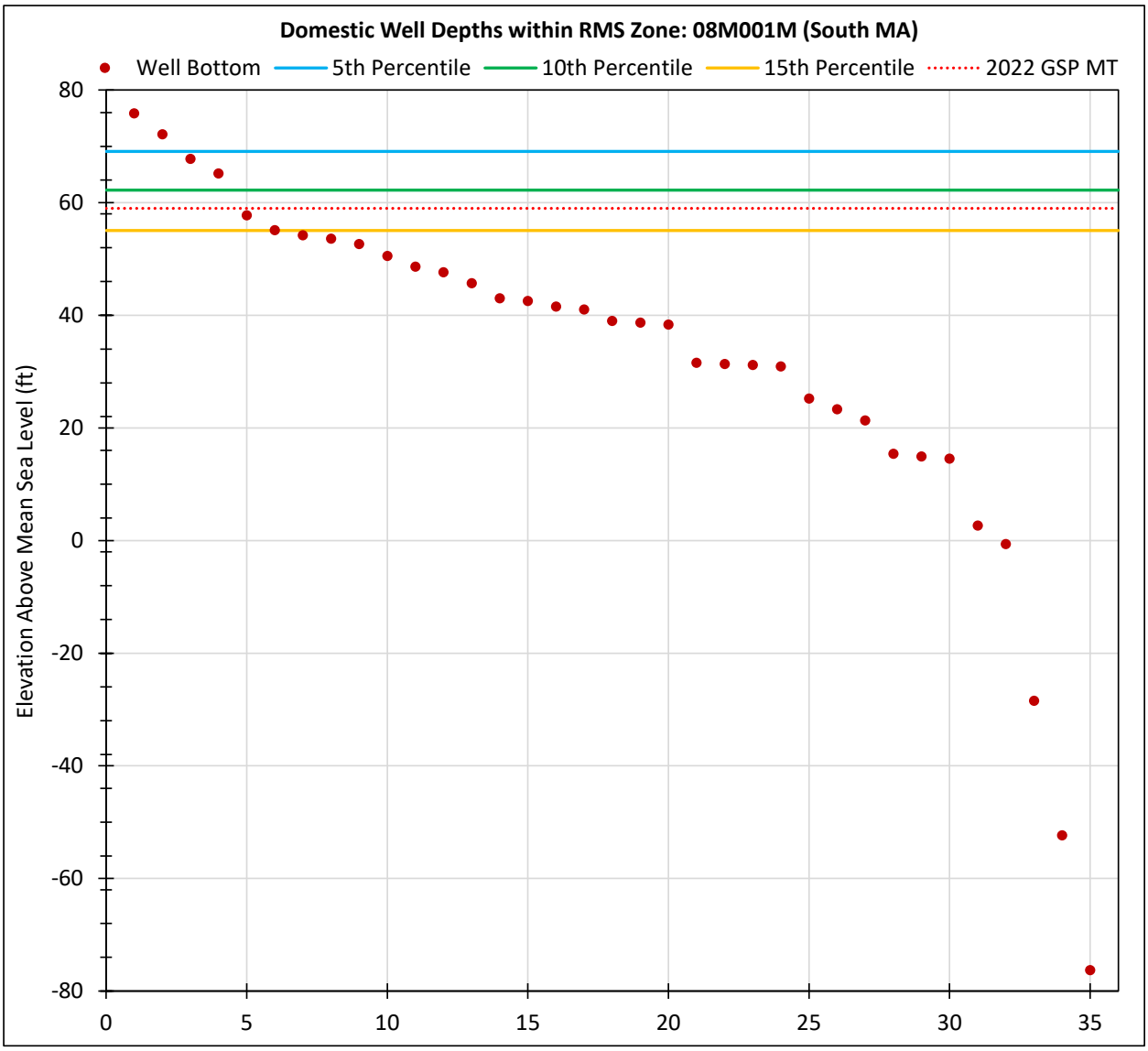
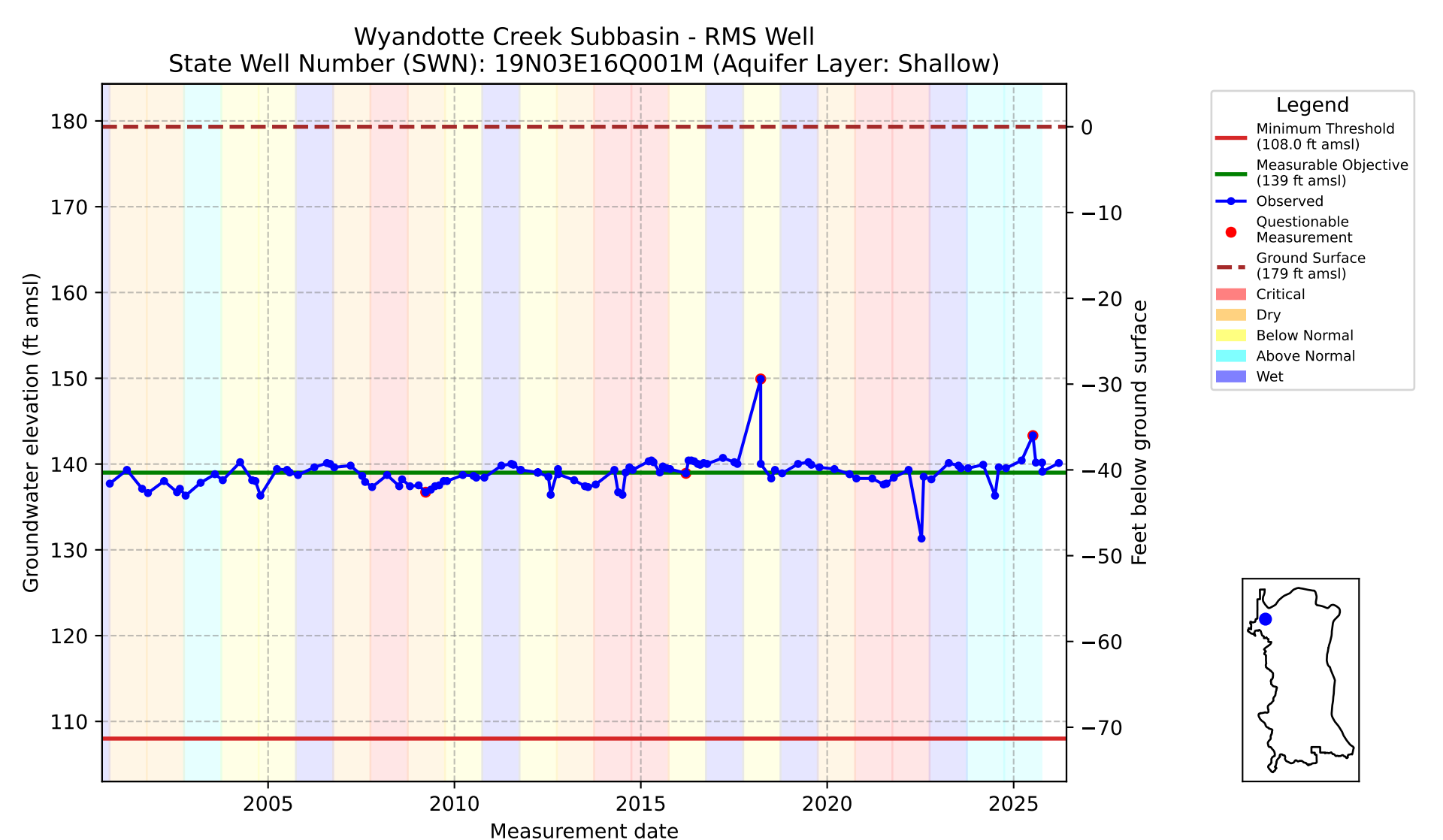
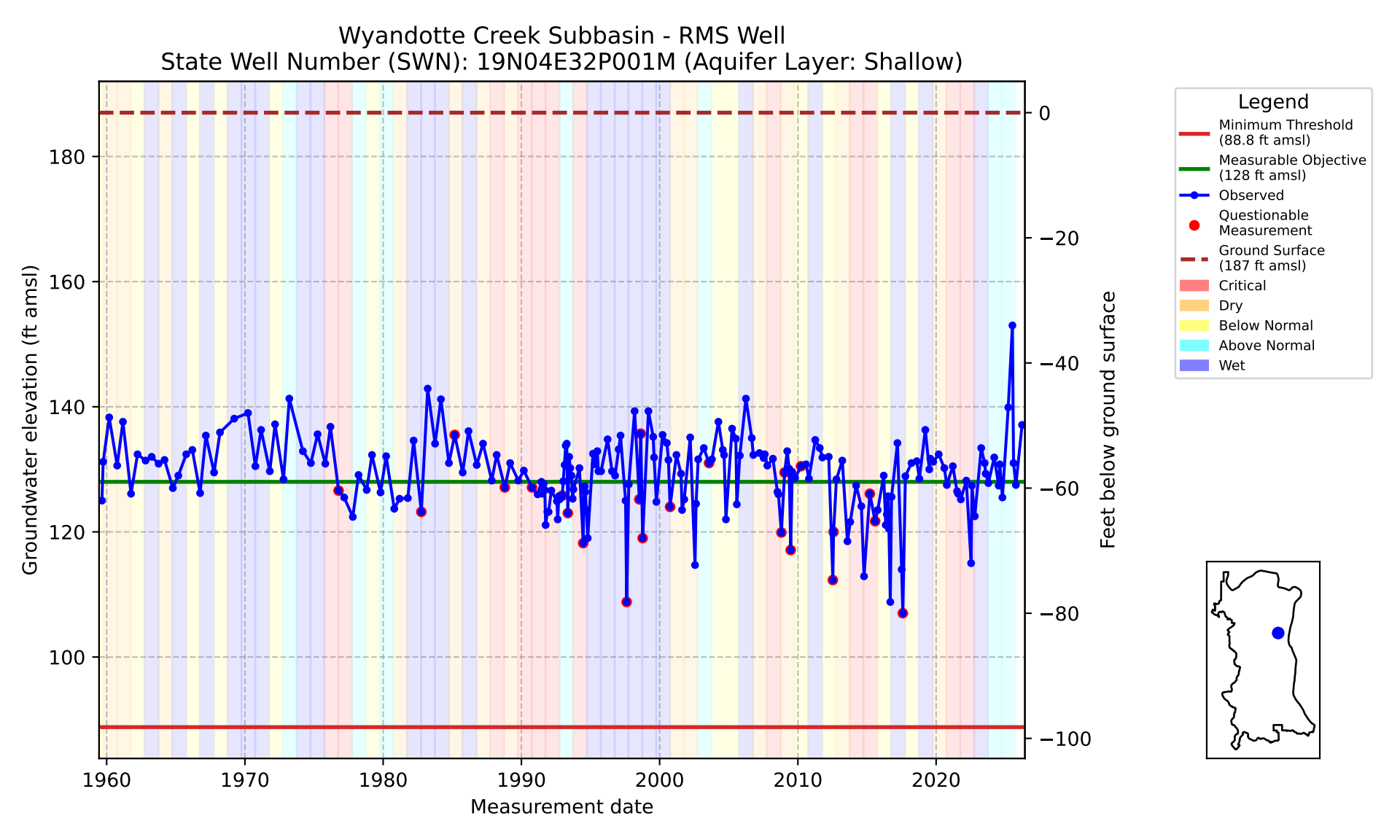
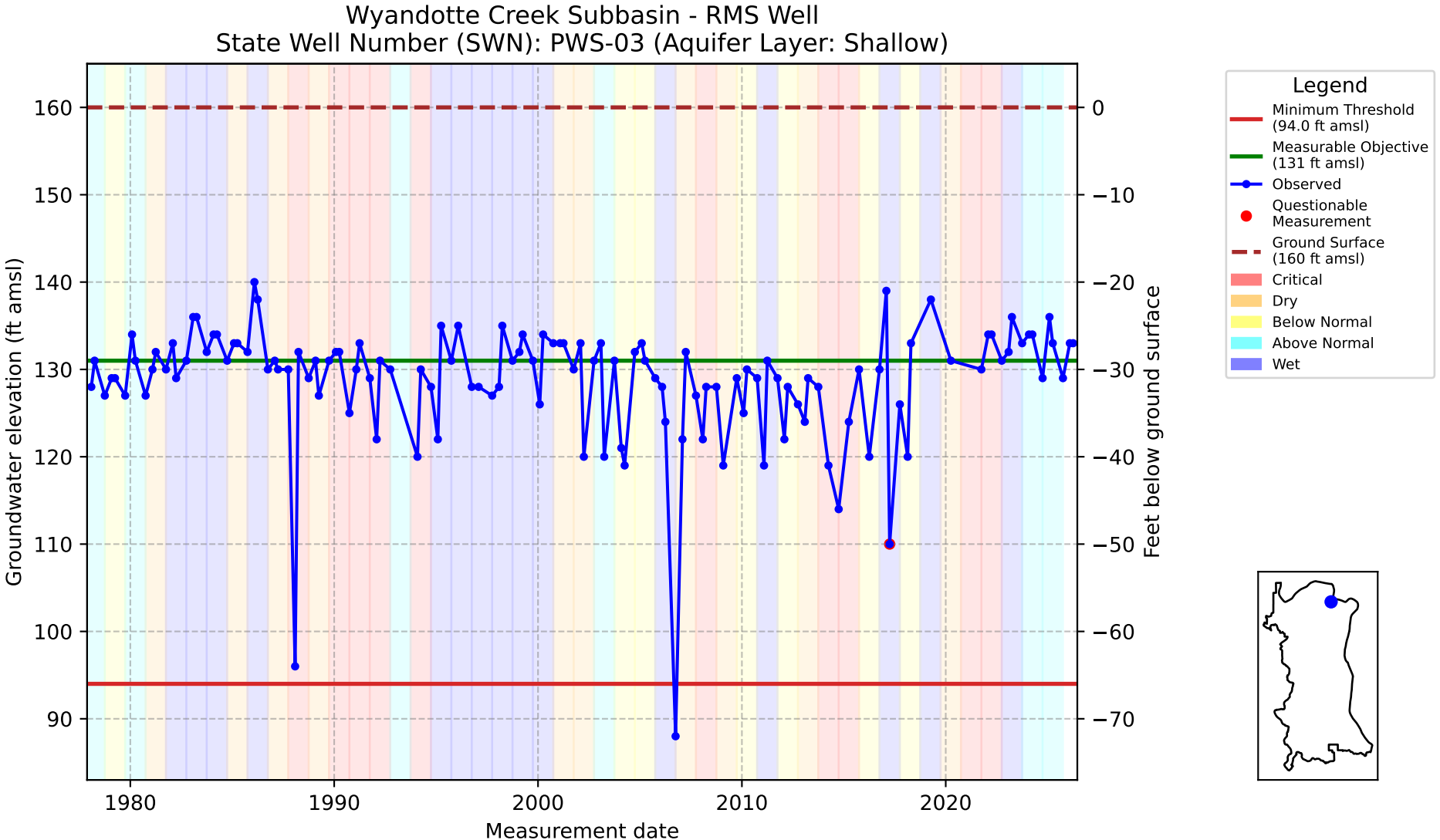


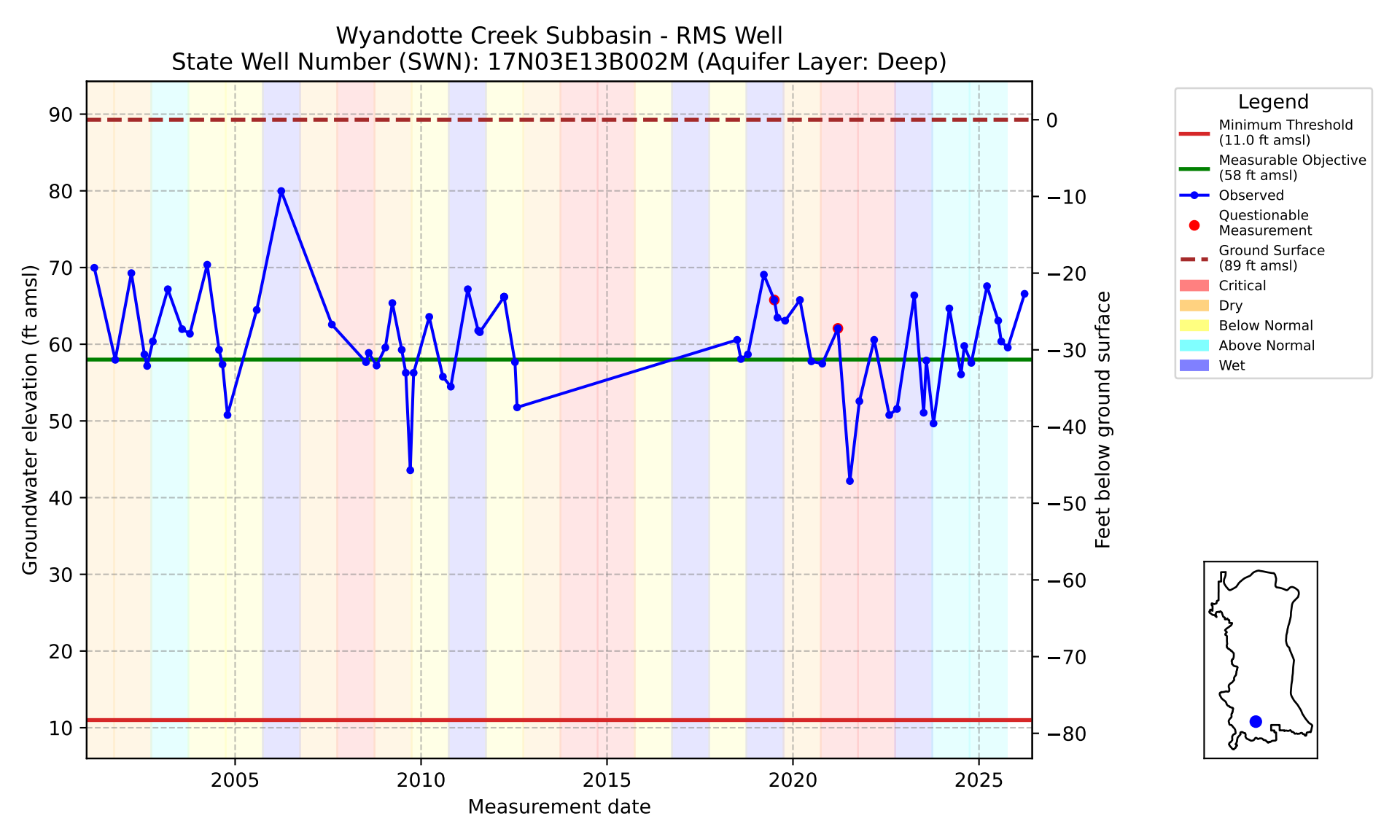
Figure 3B-10. Depths of domestic wells near RMS Well 18N04E08M001M plotted sequentially by elevation of pump; the RMS Zone contains 35 domestic wells.

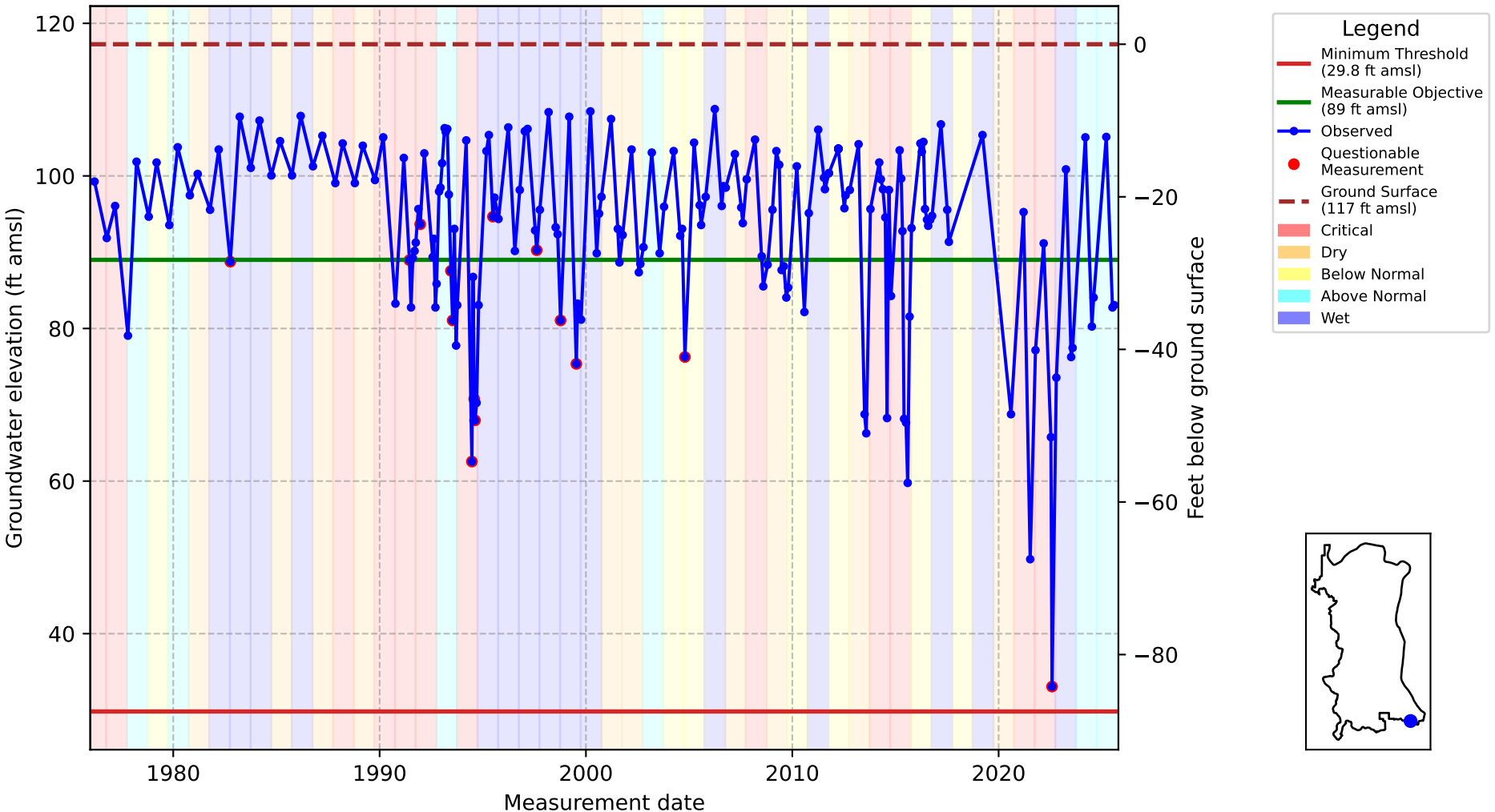
APPENDIX 3-C
GWL RMS Well Hydrographs

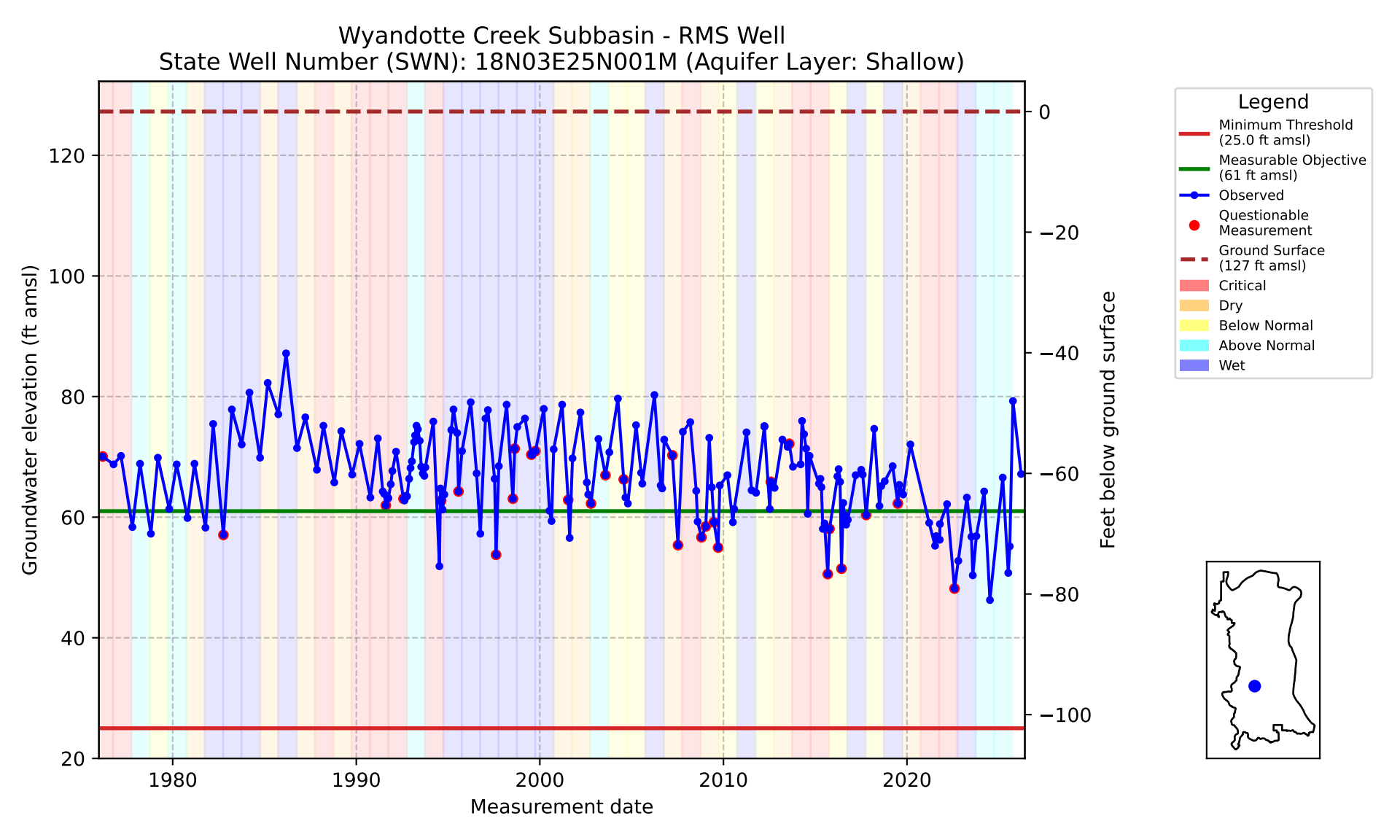

Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): 19N03E16Q001M (Aquifer Layer: Shallow)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
180
170
160
150
140
130
120
110
0
−10
−20
−30
−40
−50
−60
−70
2005
2010
2015
2020
2025
Legend
Minimum Threshold (108.0 ft amsl)
Measurable Objective (139 ft amsl)
Observed
Questionable Measurement
Ground Surface (179 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet

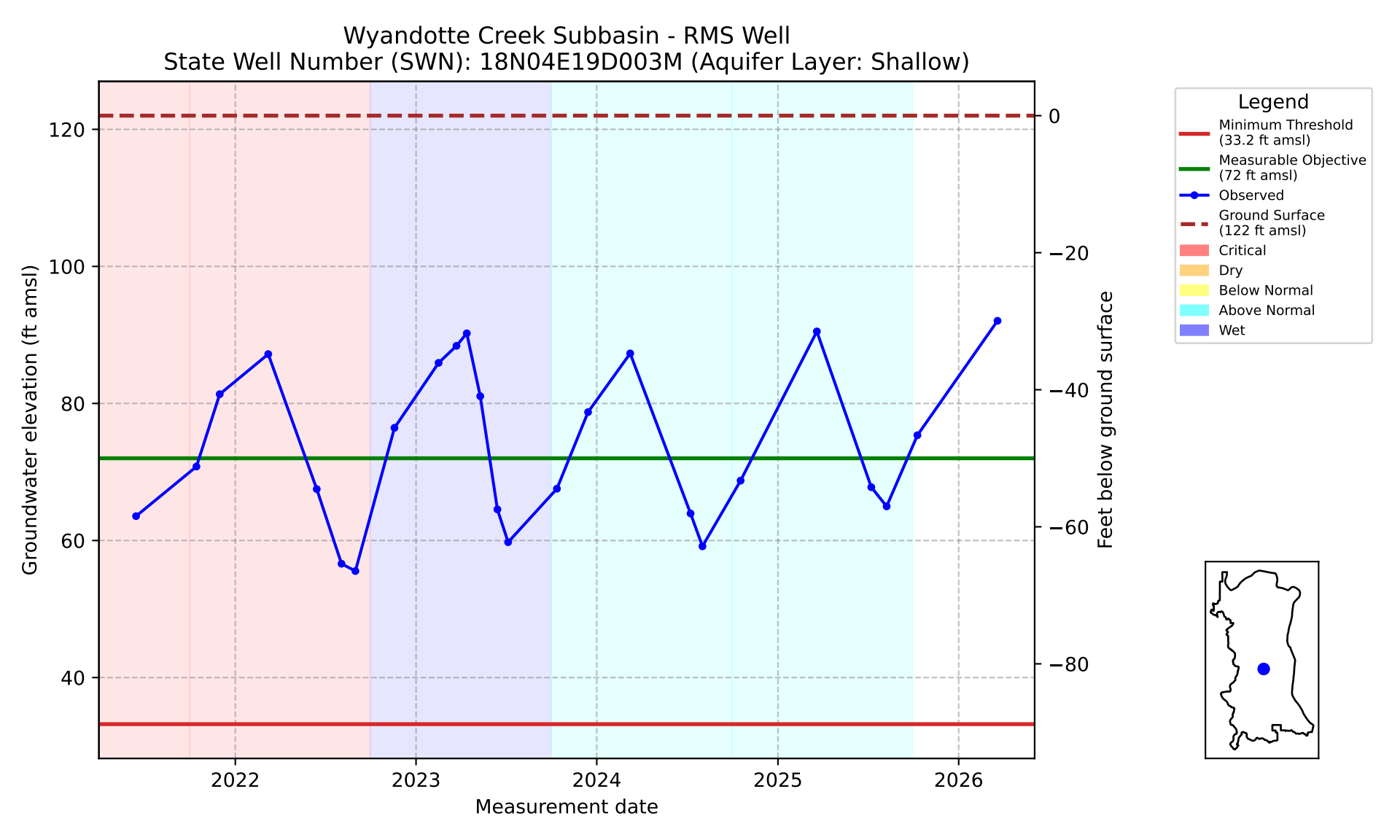

Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): 19N04E32P001M (Aquifer Layer: Shallow)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
180
160
140
120
100
0
−20
−40
−60
−80
−100
1960
1970
1980
1990
2000
2010
2020
Legend
Minimum Threshold (88.8 ft amsl)
Measurable Objective (128 ft amsl)
Observed
Questionable Measurement
Ground Surface (187 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet

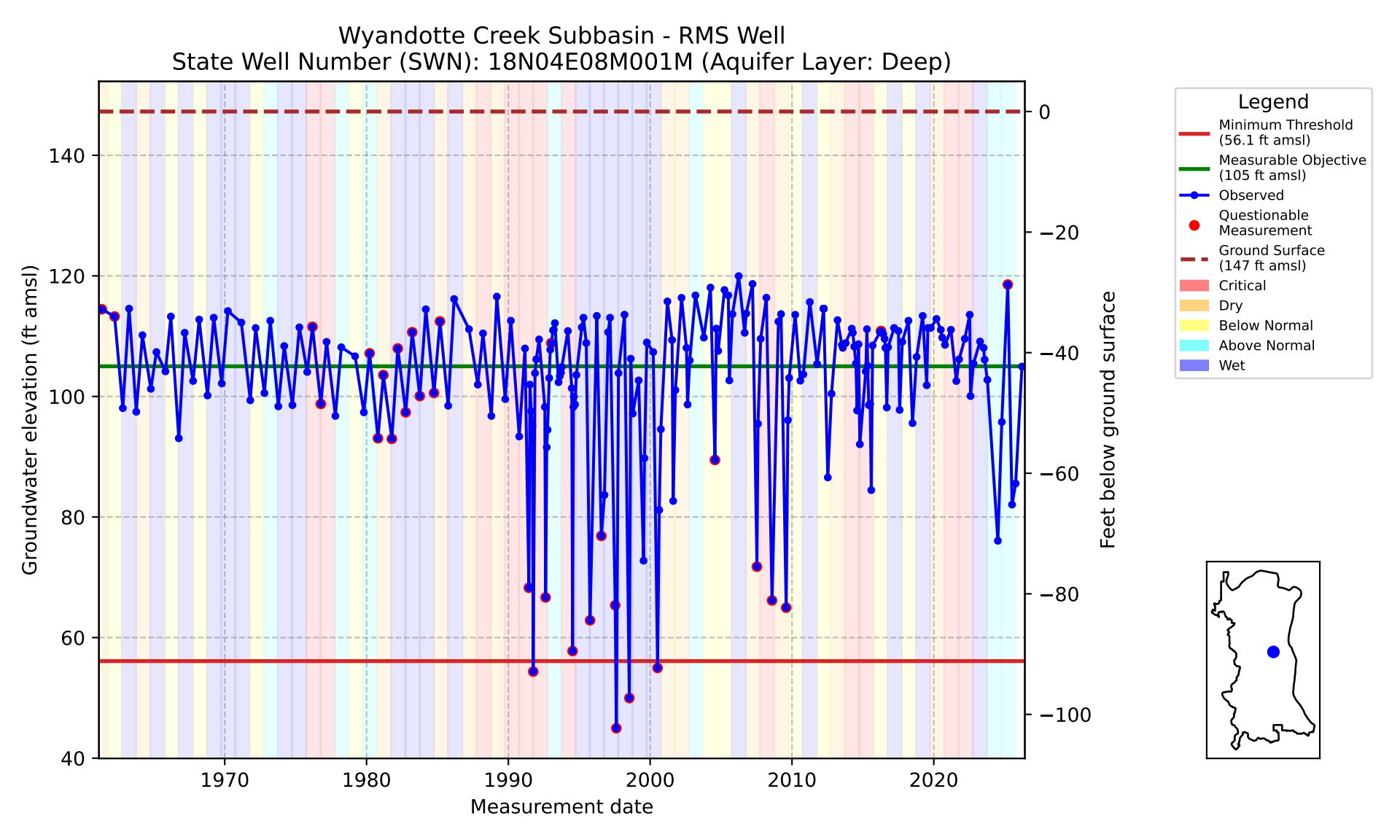

Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): PWS-03 (Aquifer Layer: Shallow)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
160
150
140
130
120
110
100
90
0
−10
−20
−30
−40
−50
−60
−70
1980
1990
2000
2010
2020
Legend
Minimum Threshold (94.0 ft amsl)
Measurable Objective (131 ft amsl)
Observed
Questionable Measurement
Ground Surface (160 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet

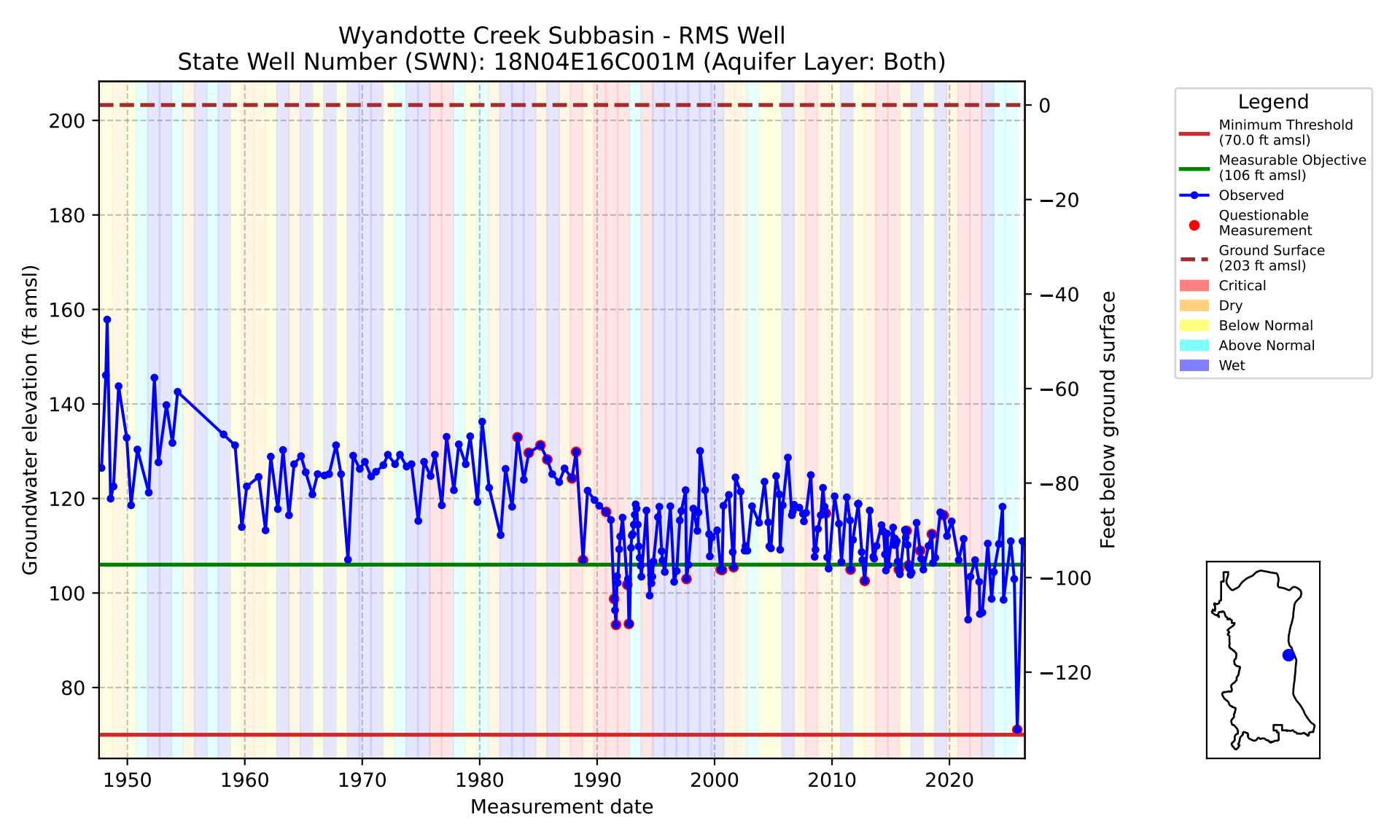

Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): 17N03E13B002M (Aquifer Layer: Deep)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
90
80
70
60
50
40
30
20
10
0
−10
−20
−30
−40
−50
−60
−70
−80
2005
2010
2015
2020
2025
Legend
Minimum Threshold (11.0 ft amsl)
Measurable Objective (58 ft amsl)
Observed
Questionable Measurement
Ground Surface (89 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet

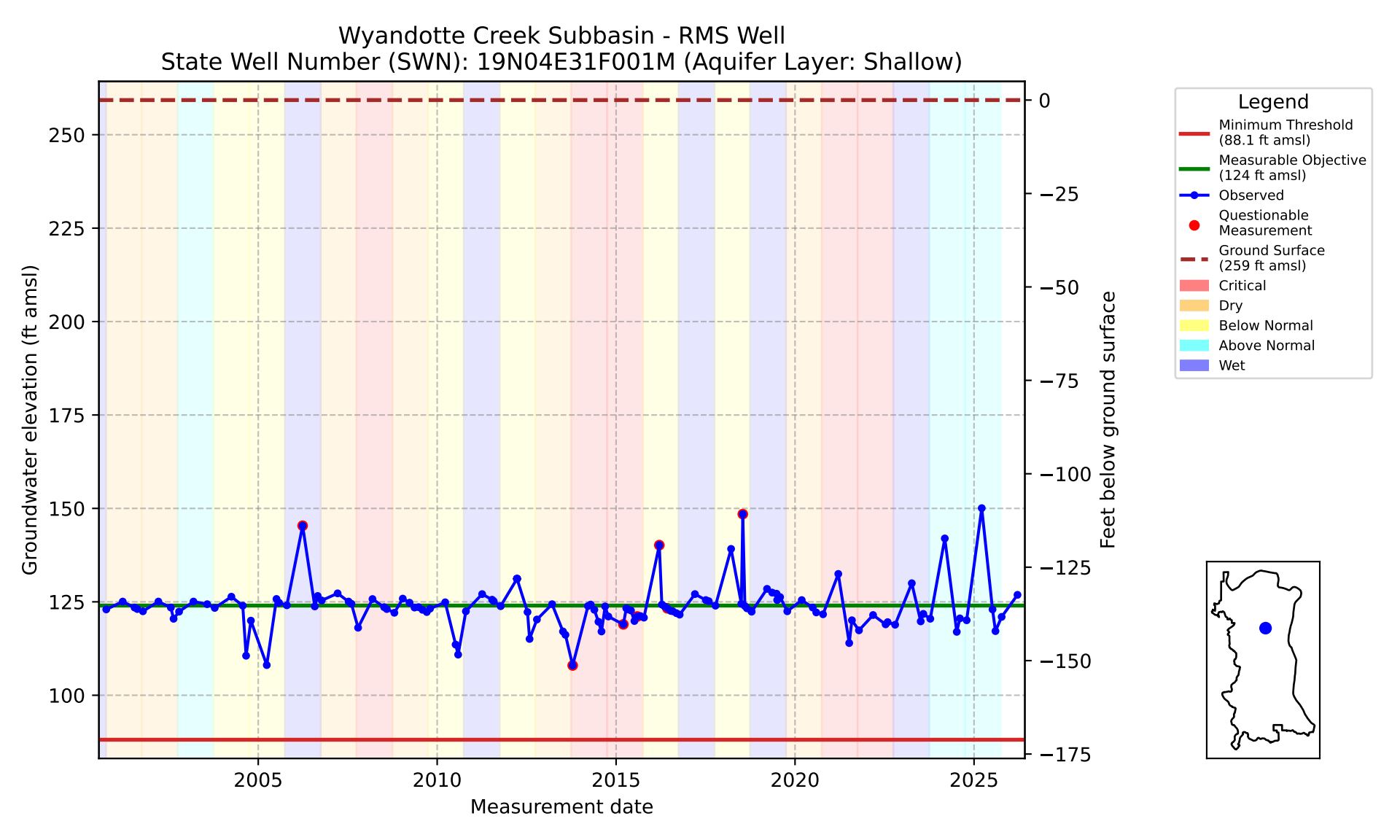

Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): 17N04E22B001M (Aquifer Layer: Shallow)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
120
100
80
60
40
0
−20
−40
−60
−80
1980
1990
2000
2010
2020
Legend
Minimum Threshold (29.8 ft amsl)
Measurable Objective (89 ft amsl)
Observed
Questionable Measurement
Ground Surface (117 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet


Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): 18N03E25N001M (Aquifer Layer: Shallow)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
120
100
80
60
40
20
0
−20
−40
−60
−80
−100
1980
1990
2000
2010
2020
Legend
Minimum Threshold (25.0 ft amsl)
Measurable Objective (61 ft amsl)
Observed
Questionable Measurement
Ground Surface (127 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet


Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): 18N04E19D003M (Aquifer Layer: Shallow)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
120
100
80
60
40
0
−20
−40
−60
−80
2022
2023
2024
2025
2026
Legend
Minimum Threshold (33.2 ft amsl)
Measurable Objective (72 ft amsl)
Observed
Ground Surface (122 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet


Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): 18N04E08M001M (Aquifer Layer: Deep)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
140
120
100
80
60
40
0
−20
−40
−60
−80
−100
1970
1980
1990
2000
2010
2020
Legend
Minimum Threshold (56.1 ft amsl)
Measurable Objective (105 ft amsl)
Observed
Questionable Measurement
Ground Surface (147 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet


Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): 18N04E16C001M (Aquifer Layer: Both)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
200
180
160
140
120
100
80
0
−20
−40
−60
−80
−100
−120
1950
1960
1970
1980
1990
2000
2010
2020
Legend
Minimum Threshold (70.0 ft amsl)
Measurable Objective (106 ft amsl)
Observed
Questionable Measurement
Ground Surface (203 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet


Wyandotte Creek Subbasin - RMS Well
State Well Number (SWN): 19N04E31F001M (Aquifer Layer: Shallow)
Groundwater elevation (ft amsl)
Feet below ground surface
Measurement date
250
225
200
175
150
125
100
0
−25
−50
−75
−100
−125
−150
−175
2005
2010
2015
2020
2025
Legend
Minimum Threshold (88.1 ft amsl)
Measurable Objective (124 ft amsl)
Observed
Questionable Measurement
Ground Surface (259 ft amsl)
Critical
Dry
Below Normal
Above Normal
Wet

APPENDIX 3-D
ISW RMS Selection Process and SMC Hydrographs

ISW RMS Well Selection Process

The same list of monitoring wells that were reviewed for the groundwater level (GWL) RMS network were also considered for the interconnected surface water (ISW) RMS network. The criteria used to evaluate the wells for the ISW RMS network was slightly different from those used for the GWL RMS network, and are as follows:

1. Is the well screened only in the shallowest aquifer layer?
2. Does the well have at least 5 years of good-quality historical data for both spring and fall?
3. Is the site consistently measured biannually, at least? If not, could the well easily be measured more often?
4. Are at least 80% of the measurements taken of good quality (i.e., no pumping, no oil problems, etc.)?
5. Do historical measurements suggest underlying geologic features that may make the measured groundwater levels not representative of the general area?
6. Does the well have access problems or other barriers that would prevent taking consistent measurements at the well?
7. Is the well within half a mile of the Feather River or Honcut Creek?

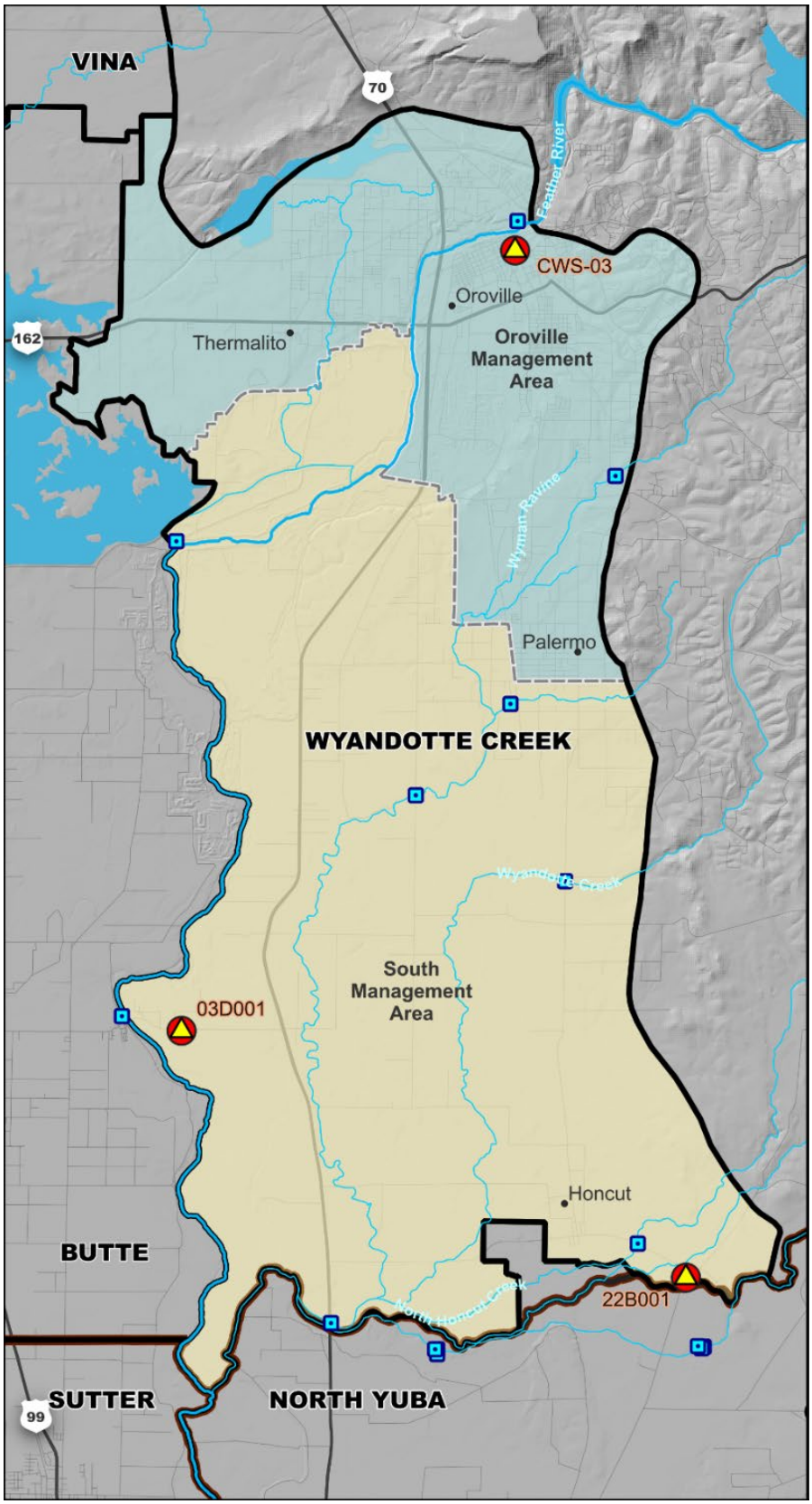


Figure 3D-1. Wyandotte Creek ISW RMS Wells, symbolized as yellow triangles inscribed in red circles on the map.

ISW Sustainable Management Criteria Hydrographs

Only three well met the seven criteria, and are shown on the map on the previous page (Figure 1). The following three hydrographs (Figure 2, Figure 3, and Figure 4) correspond to the three RMS wells, and display the historical record of the well, the MT (approach discussed previously in Section 3.8.4), the MO (approach discussed previously in Section 3.8.5), and the ground surface elevation (GSE) of the well and nearby streambed. If the MO was defined using the trend of fall low measurements, then the trendline is also included.

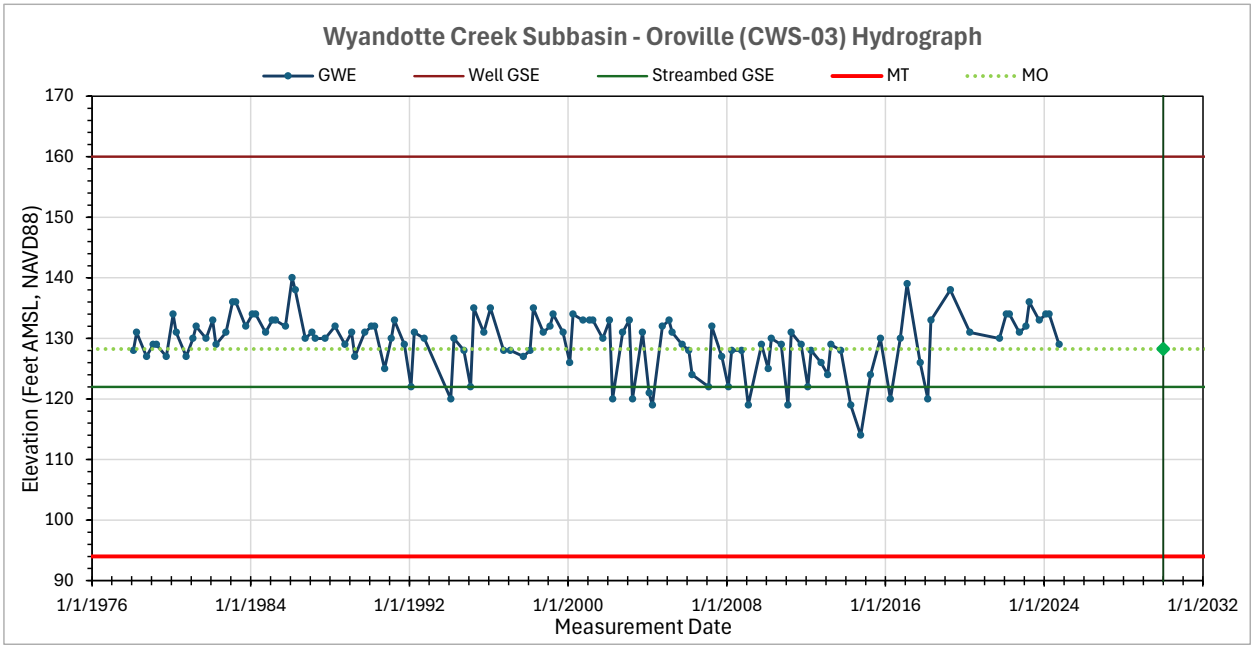


Figure 3D-2. Hydrograph for RMS Well CWS-03 near the Feather River in Oroville MA.

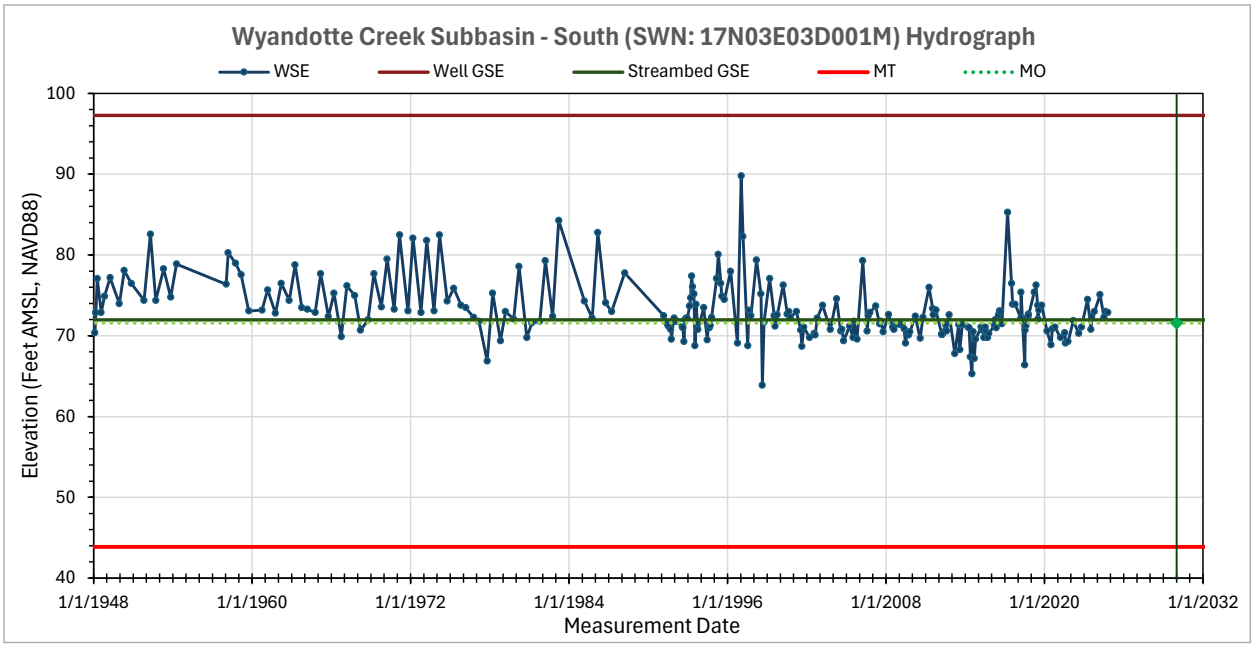


Figure 3D-3. Hydrograph for RMS Well 17N03E03D001M near the Feather River in the South MA.

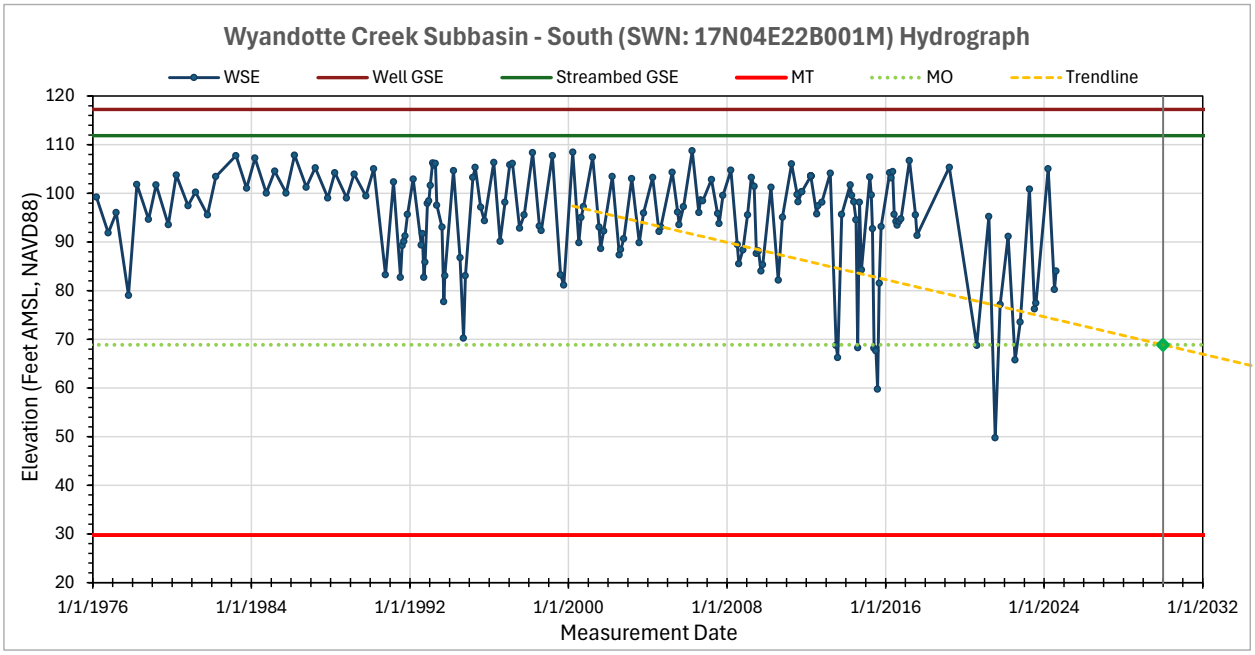


Figure 3D-4. Hydrograph for RMS Well 17N04E22B001M near Honcut Creek in the South MA.

APPENDIX 6-A
Northern Sacramento Valley Inter-basin Coordination Report

Northern Sacramento Valley Inter-basin Coordination Report

Antelope | Bowman | Butte | Colusa | Corning | Los Molinos | Red Bluff | Sutter | Vina | Wyandotte Creek | Yolo

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Glossary of Acronyms

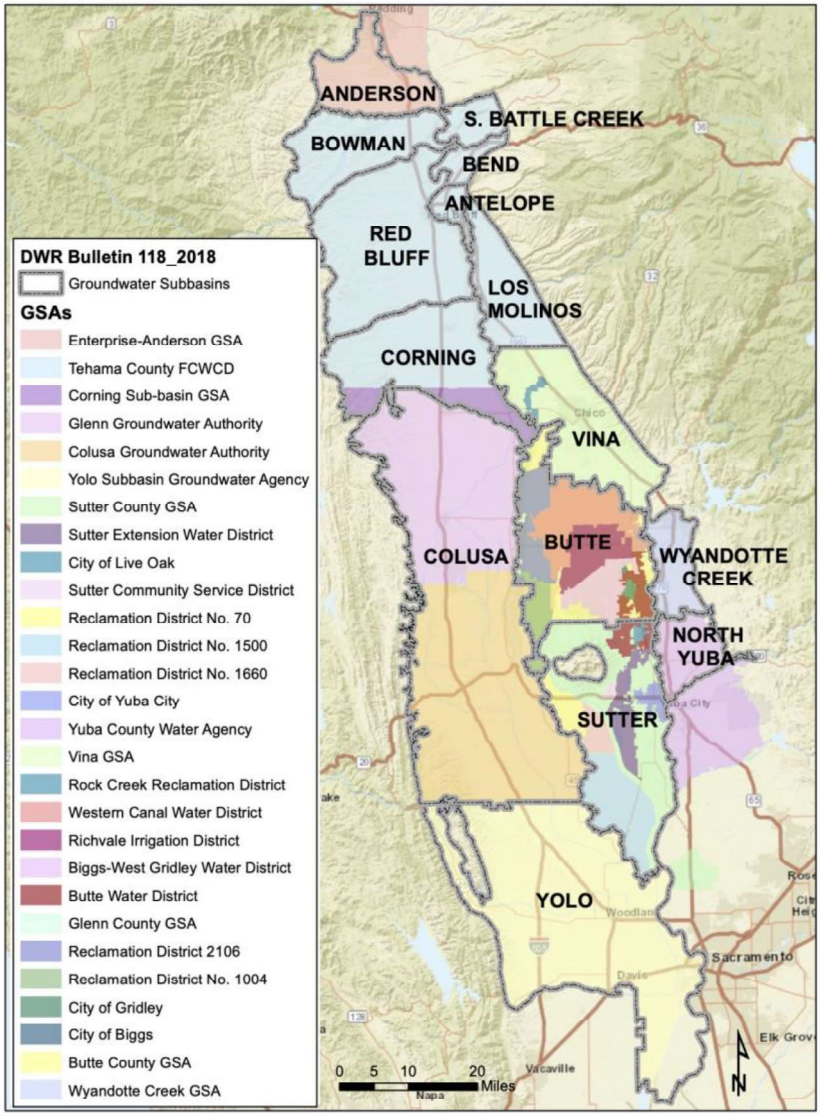
- ***CBI*** – *Consensus Building Institute [link]*
- ***DWR*** – *California Department of Water Resources*
- ***GSA*** – *Groundwater Sustainability Agency*
- ***GSP*** – *Groundwater Sustainability Plan*
- ***MOU*** – *Memorandum of Understanding*
- ***NCWA*** – *Northern California Water Association*
- ***NSV IRWM***– *Northern Sacramento Valley Integrated Regional Water Management*
- ***PMAs*** – *Projects and Management Actions*
- ***SGMA*** – *Sustainable Groundwater Management Act*
- ***SMC*** – *Sustainable Management Criteria*

1. Introduction & Background

The content of the report is the result of staff recommendations resulting from regional inter-basin coordination staff meetings in the Northern Sacramento Valley (2020-2021). The content will be presented to inform discussions among Groundwater Sustainability Agencies (GSAs) and gather public input through existing public venues, such as advisory committees, groundwater commissions, and GSA Board meetings.

Inter-basin coordination is critical in the Northern Sacramento Valley as GSAs develop and implement Groundwater Sustainability Plans (GSPs). Since groundwater subbasins in the Northern Sacramento Valley are hydrologically interconnected, water management decisions and actions in subbasins (i.e., groundwater pumping and processes affecting recharge, water demand, and supply including climate change) could change aquifer conditions. Understanding and accounting for these processes is important towards achieving sustainability in all subbasins.

Figure 1. Map of the Northern Sacramento Valley



Inter-basin coordination is described in the GSP Regulations in Article 8. Under the regulations, GSAs must describe how they coordinate with adjoining subbasins to demonstrate implementation will not adversely affect adjoining subbasins. The Department of Water Resources (DWR) is required to evaluate whether a GSP adversely affects the ability of an adjacent basin to implement their GSP or impedes achievement of sustainability goals in an adjacent basin (Water Code 17033(c)). Coordination among GSAs can be formalized in different ways and inter-basin agreements are voluntary. Appendix A describes components of Sec 357.2.

Inter-basin coordination discussions among staff representatives from 11 subbasins (Antelope, Bowman, Butte, Colusa, Corning, Los Molinos, Red Bluff, Sutter, Vina, Wyandotte Creek, and Yolo), with facilitation support from the Consensus Building Institute (CBI) began during the summer of 2020. While efforts have focused on these subbasins, coordination will occur, as warranted, with other neighboring subbasins (Anderson and North Yuba).

Initial stages of inter-basin coordination efforts (May-December 2020) were closely aligned with the GSP Regulations in Article 8 components and delineated in Section 3 *Evolution of Inter-basin Coordination Efforts*. After an initial attempt to compile technical information to better understand basin conditions at respective boundaries, staff realized differing timelines for the completion of Basin Setting content in each subbasin meant there would not be sufficient time during initial GSP development to fully characterize or address major inconsistencies. Therefore, the goal for regional inter-basin coordination shifted towards establishing a framework for long-term inter-basin coordination and dialogue (post GSP submittal in 2022). Informal coordination discussions among staff and consultants between neighboring subbasins continued during the GSP development process.

This report outlines the intent and purpose of inter-basin coordination in the Northern Sacramento Valley. It describes the process followed and materials developed throughout the process. It also outlines foundational elements, referred to as "key pillars," of a framework for sustained coordination through GSP implementation.

2. Intent & Purpose

Inter-basin coordination efforts in the Northern Sacramento Valley are focused on establishing a foundation and guidelines for sustained inter-basin coordination through GSP implementation, following the initial submittal of GSPs by January 31, 2022. GSAs intend to:

1. *Establish a framework allowing for continued dialogue and a venue to address issues and discrepancies during the implementation of the GSPs;*
2. *Coordinate on consistent messaging and communicate shared expectations at a regional level;*
3. *Demonstrate regional coordination efforts and outcomes; and*
4. *Leverage existing agreements and arrangements in the region (e.g., Northern Sacramento Valley Integrated Regional Water Management (NSV IRWM), the Six County Memorandum of Understanding among Butte, Colusa, Glenn, Tehama, Shasta, and Sutter).*

The proposed deliverable from this effort is the development of a common approach and draft language for incorporation into each subbasin's GSP. This narrative describes the facilitated effort as well as the framework and scope for long-term coordination during plan implementation. The public will have opportunities to weigh in and provide input on the proposed framework through each subbasin's existing public venues, such as advisory committees, groundwater commissions, and GSA board meetings.

3. Evolution of Inter-basin Coordination Efforts

Inter-basin coordination efforts, facilitated by the Consensus Building Institute (CBI) began in summer 2020 among Subbasin staff from Antelope, Bowman, Butte, Colusa, Corning, Los Molinos, Red Bluff, Vina, and Wyandotte Creek subbasins to identify priorities and resources available for inter-basin coordination. Soon after, staff representatives from the Sutter and Yolo subbasins joined the meetings. To date, CBI has facilitated nine inter-basin coordination meetings with staff and periodically with technical consultants from the subbasins. Subbasin staff and/or CBI communicated regular updates to GSA Boards and advisory committees in each of the subbasins regarding the status of inter-basin coordination activities [Access Webpage Here].

Initial stages of inter-basin coordination efforts were closely aligned with the GSP Regulations in Article 8:

1. ***General information*** *of subbasins, plans and agencies participating in the coordination agreement,*
2. ***Technical information*** *including consistent and coordinated data or methodology for inter-basin boundary flows and stream-groundwater interactions at basin boundaries, and information on sustainable management criteria and monitoring that would confirm that no adverse impacts of implementing the GSPs would result to any party to the agreement,*
3. *A description of the* ***process for identifying and resolving conflicts*** *between Agencies that are parties to an inter-basin coordination agreement.*
   Reference: *Sections 10727.2, 10733, and 10733.2, Water Code.*

The goal at the initial stage was to compile general and technical information identified by DWR in a consistent manner to establish an accurate basis of comparison and to identify any significant inconsistencies that may need to be addressed or resolved. This included developing a series of information-sharing documents and outreach materials, summarized below.

1. ***Inter-basin Coordination Directory–*** *This document provides an updated and centralized directory with contact information for GSA managers, technical consultants, and facilitators in the various subbasins. This document seeks to facilitate communication among the various representatives leading GSP development [Access Here].*
2. ***Technical Information-Sharing Template–*** *This template was developed among the managers and technical consulting teams to compile and compare information on modeling tools and water budget results for inter-basin flows, stream-aquifer interactions, and hydro-geologic conditions in the subbasins. Potentially, this document could be used to compile information about Sustainable Management Criteria and Monitoring Networks [Access Draft Template Here]. The first output from the technical information-sharing template summarizes the highlights of compiled model information across the subbasins [Access Here].*
3. ***Outreach Presentation–****This PowerPoint presentation provides updates on inter-basin coordination activities to the various SGMA public venues (GSA boards, advisory committees, etc.) and an overview of the scope and timeline of inter-basin coordination efforts. This presentation is continuously updated*

after each inter-basin coordination staff meeting for use in consistently communicating with GSA Boards/advisory committees and the public throughout the region [Access Here].

4. ***Outreach Factsheet–*** *The inter-basin coordination factsheet aims to support public outreach and information sharing in the various subbasins. This two-page flier or factsheet summarizes why regional coordination is important under SGMA, who is involved in ongoing efforts, what the coordination priorities are, and includes a table with links to each subbasin's website for additional subbasins' specific information [Access Here].*
5. ***Inter-basin Coordination Webpage–*** *Butte County hosts a webpage to provide the most up-to-date information on inter-basin coordination efforts in the Northern Sacramento Valley. The webpage provides an overview of the scope and makes available documentation and results of the inter-basin coordination work, including meeting agendas, summaries, and outputs [Access Here].*
6. ***Meeting Summaries–****CBI develops meeting summaries after each regional inter-basin coordination staff meeting to summarize key discussion themes, action items, and next steps. These summaries are publicly available on the inter-basin coordination webpage [Access Here].*

After an initial attempt to compile technical information, staff realized the broad aspirations were not feasible during the initial stages of GSP development. The process of compiling and comparing modeling outputs from the diverse regional hydrological models required a significant amount of time, resources, and varying levels of data. Further, subbasins were at different stages of GSP development and GSAs were facing tight timelines, competing priorities, and capacity limitations to meet the regulatory deadline. While communication on a neighbor-to-neighbor basis on technical components was encouraged through GSP development, subbasin staff representatives realized more robust technical analysis and coordination between and among subbasins was not possible until initial plans (including water budgets) were more fully developed or after adoption of the initial GSPs.

Following reflection from the separate inter-basin efforts and priorities moving forward, subbasin staff recommended shifting the focus of regional coordination meetings to establishing a framework for long-term inter-basin coordination and dialogue following GSP submission in January 2022. To do so, subbasin staff identified desired outcomes in the short-term (during initial GSP development), mid-term (first 5-year update), and long-term (GSP Implementation through 2042) [Access Here]. This approach recognizes adoption of the 2022 GSPs as an initial step in sustainable groundwater management, not the final step. Subbasin staff acknowledged while model outputs may not match perfectly, the main objective is to identify and acknowledge significant discrepancies, understand why those differences exist, and evaluate to the extent they need to be reconciled. Inter-basin coordination has been characterized as "a marathon not a sprint," and current efforts will serve to pave the path for long-term collaboration. Further, GSAs can take advantage of annual reporting and five-year GSP updates to identify and address discrepancies. Lastly, subbasin staff representatives acknowledge public participants are interested in inter-basin coordination efforts and concerns from some subbasins can easily affect others. Subbasin staff understand the need to share and educate the public on what is in the various GSPs, and the SGMA requirements for inter-basin coordination. Staff will continue to provide updates and gather GSA Board and public input related to the direction of current efforts and desired priorities, shared concerns, and possible ideas for inter-basin coordination during GSP implementation.

4. Inter-basin Coordination Framework

This section outlines the foundational pillars that comprise the framework for inter-basin coordination under SGMA between and among subbasins in the Northern Sacramento Valley. These pillars build upon a long-standing history of regional collaboration and embody a commitment for continued coordination, collaboration, and communication for successful groundwater management in the region. Honoring the individual authorities of the GSAs, these pillars represent a menu of options neighboring subbasins can draw upon, based on individual or neighboring subbasins' needs and challenges. GSA Boards can decide which of these options they would like to support and implement, acknowledging circumstances may change over time.

Pillars	Scale(s)	Timing
1. Information-sharing a. Inform each other on changing conditions (i.e., surface water cutbacks, land use changes, policy changes that inform groundwater management) b. Share annual reports and interim progress reports c. Share data and technical information and work towards building shared data across and/or along basin boundaries (e.g., monitoring data, water budgets, modeling inputs and outputs, and Groundwater Dependent Ecosystems)	• Neighbor-to-neighbor • Coordination groups [Refer to section 4.1 below]	• *Ongoing (GSP Development)* • *Near-term (5-year update)* • *Long-term (GSP implementation)*
2. Joint analysis & evaluation a. Evaluate and compare contents of GSPs with a focus on establishing a common understanding of basin conditions at boundaries b. Identify significant differences, uncertainties, and potential issues of concern related to groundwater interaction at the boundaries c. Engage in analysis and evaluation of SMCs between GSPs to assess impacts and identify significant differences and possible impacts between subbasins that could potentially lead to undesirable results	• Neighbor-to-neighbor • Coordination groups [Refer to section 4.1 below]	• *Near-term (5-year update)* • *Long-term (GSP implementation)*
3. Coordination on mutually beneficial activities a. Communicate, coordinate, and collaborate on mutually beneficial activities, which could include joint monitoring, joint reporting, regional modeling, and other efforts to address data gaps at subbasin boundaries b. Collectively pursue funding and collaborate on mutually agreed upon projects and management actions that provide benefits across boundaries c. Leverage existing collaboratives (NSV IRWM, NCWA etc.)	• Neighbor-to-neighbor • Coordination groups • Regional: NSV IRWM, NCWA Groundwater Task Force	• *Ongoing (GSP Development)* • *Near-term (5-year update)* • *Long-term (GSP implementation).*
4. Coordinated communication and outreach a. Coordinate and collaborate on regional-scale public engagement and communication strategies that promote awareness on groundwater sustainability, enhance public trust, and maintain institutional knowledge b. Maintain list of GSP/subbasin staff contacts and websites	• Regional: NSV IRWM and NCWA Groundwater Task Force	• *Ongoing (GSP Development)* • *Near-term (5-year update)* • *Long-term (GSP implementation)*
5. Issue-resolution process a. Establish and follow an agreed-upon process for identifying and resolving conflicts between GSAs by the first five-year update [Refer to Appendix D for more details and discussion prompts on issue resolution processes]	• Neighbor-to-neighbor • Coordination groups	• *Near-term (5-year update)* • *Long-term (GSP implementation).*

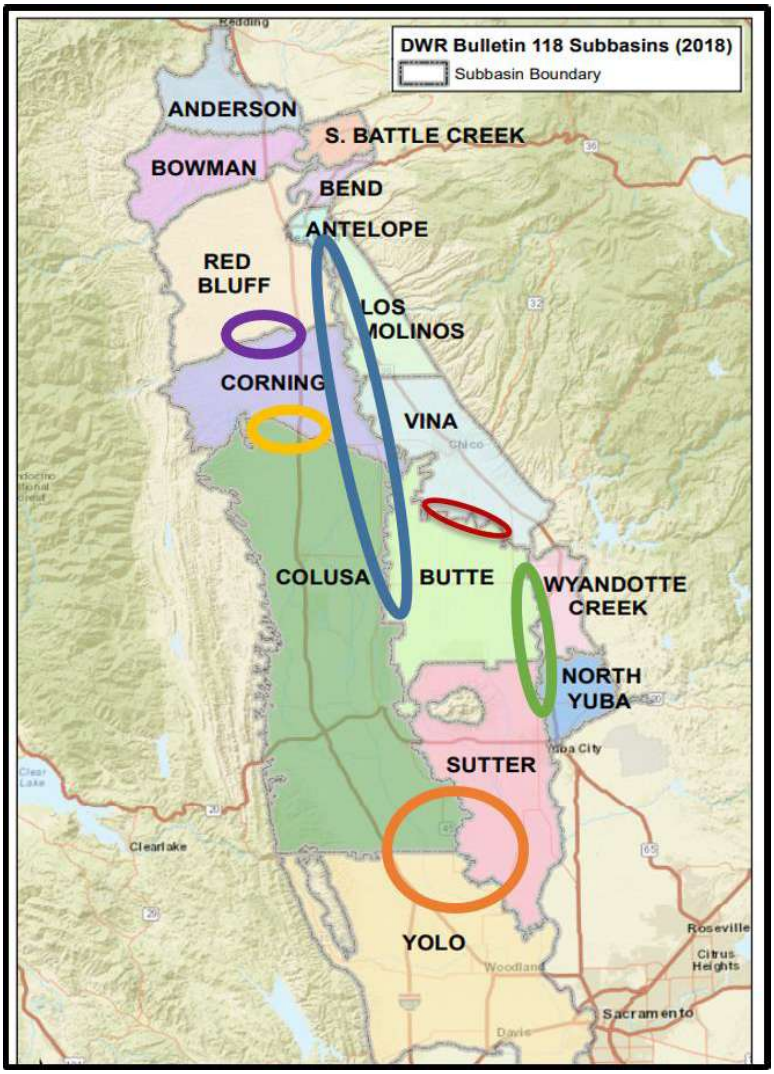
4.1. Inter-basin Coordination Groups

Inter-basin coordination efforts, as outlined in the pillars above, would require resources and technical support. Subbasin staff recommend organizing inter-basin coordination priorities by specific subbasin boundaries. One suggested approach identifies specific "Coordination Groups" (see Figure 3 and list below). Some of these groups are pairs and others include multiple subbasins around a river boundary.

1. ***Feather River Corridor***- *Butte, Wyandotte Creek, North Yuba, Sutter*
2. ***North Sacramento River Corridor***- *Antelope, Los Molinos, Red Bluff, Corning, Vina, Butte, Colusa*
3. ***South Sacramento Corridor***- *Colusa, Sutter, Yolo*

Neighbor to Neighbor, examples:

4. ***Stony Creek***- *Corning, Colusa*
5. ***Thomes Creek***- *Red Bluff, Corning*
6. ***Butte/Vina***- *Vina, Butte*



5. Conclusion and Next Steps

In sum, this report outlines a framework for inter-basin coordination for sustainable groundwater management in the Northern Sacramento Valley. The inter-basin coordination framework describes a menu of options for ongoing communication and collaboration around substantive issues over the twenty-year implementation of SGMA.

The pillars and other content from this report could be used by GSAs to support GSP development and implementation in a number of ways. This inter-basin coordination report could be included as an Appendix to the GSP and could be updated on a yearly basis. Individual subbasins can incorporate sections of the report into the body of the GSP, depending upon specific boundary conditions at adjoining subbasins. Finally, subbasins could draw on the inter-basin coordination framework if they would like to consider entering into one or more voluntary inter-basin agreements during GSP implementation.

The content of the report is the result of staff recommendations resulting from regional inter-basin coordination staff meetings. Staff will present the framework as a supporting document to guide and inform discussions with the GSA Boards and other existing public venues, such as advisory committees or groundwater commissions. GSAs in turn will discuss the menu of options for inter-basin coordination outlined in this report to determine their priorities and desired approach to draw on the inter-basin coordination framework in their individual GSPs. Lastly, Subbasin staff will come together to share input received and determinations from their respective GSAs.

Subbasin staff acknowledge that while this report builds upon a long-standing history of regional collaboration, this is just the beginning of inter-basin coordination efforts under SGMA. Therefore, this framework and inter-basin coordination activities will be continually refined throughout GSP implementation.

Appendices

Appendix A: GSP Emergency Regulations, Article 8: Interagency Agreements §357.2

§ 357.2. Inter-basin Agreements (access here)

Two or more Agencies may enter into an agreement to establish compatible sustainability goals and understanding regarding fundamental elements of the Plans of each Agency as they relate to sustainable groundwater management. Inter-basin agreements may be included in the Plan to support a finding that implementation of the Plan will not adversely affect an adjacent basin's ability to implement its Plan or impede the ability to achieve its sustainability goal. Inter-basin agreements should facilitate the exchange of technical information between Agencies and include a process to resolve disputes concerning the interpretation of that information. Inter-basin agreements may include any information the participating Agencies deem appropriate, such as the following:

(a) General information:
  (1) Identity of each basin participating in and covered by the terms of the agreement.
  (2) A list of the Agencies or other public agencies or other entities with groundwater management responsibilities in each basin.
  (3) A list of the Plans, Alternatives, or adjudicated areas in each basin.

(b) Technical information:
  (1) An estimate of **groundwater flow across basin boundaries**, including consistent and coordinated data, methods, and assumptions.
  (2) An estimate of **stream-aquifer interactions** at boundaries.
  (3) A **common understanding of the geology and hydrology** of the basins **and the hydraulic connectivity** as it applies to the Agency's determination of groundwater flow across basin boundaries and description of the different assumptions utilized by different Plans and how the Agencies reconciled those differences.
  (4) **Sustainable management criteria and a monitoring network** that would confirm that no adverse impacts result from the implementation of the Plans of any party to the agreement. If minimum thresholds or measurable objectives differ substantially between basins, the agreement should specify how the Agencies will reconcile those differences and manage the basins to avoid undesirable results. The Agreement should identify the differences that the parties consider significant and include a plan and schedule to reduce uncertainties to collectively resolve those uncertainties and differences.

(c) A description of the **process for identifying and resolving conflicts** between Agencies that are parties to the agreement.

(d) Inter-basin agreements submitted to the Department shall be posted on the Department's website.

Note: Authority cited: Section 10733.2, Water Code.
Reference: Sections 10727.2, 10733, and 10733.2, Water Code.

Appendix B: Inter-basin Coordination Fact Sheet

Northern Sacramento Valley | Sustainable Groundwater Management Act

Regional Coordination Between Subbasins

Antelope | Bowman | Butte | Colusa | Corning | Los Molinos | Red Bluff | Sutter | Vina | Wyandotte Creek | Yolo

Sustainable Groundwater Management Act

What is SGMA? California enacted the Sustainable Groundwater Management Act (SGMA) in 2014 to better manage groundwater over the long term. Sustainability is achieved by avoiding significant and unreasonable conditions for the six "sustainability indicators."

- Lowering of Groundwater Levels
- Reduction of Groundwater Storage
- Land Subsidence
- Surface Water Depletion
- Water Quality Degradation
- Sea Water Intrusion

Why is regional coordination important? In the Sacramento Valley, inter-basin coordination is critical as Groundwater Sustainability Agencies (GSA) develop their Groundwater Sustainability Plans (GSP). Since groundwater subbasins in the Northern Sacramento Valley (NSV) are hydrologically interconnected, water management decisions and actions in one subbasin (e.g. groundwater pumping) and processes like climate change could change aquifer conditions and affect flows to other subbasins. Understanding and accounting for these processes is key to achieve sustainability in all subbasins.

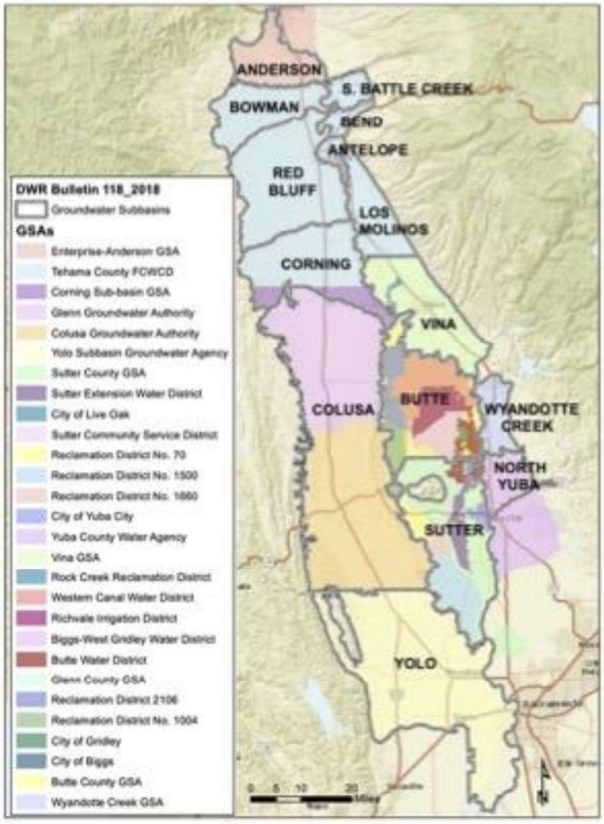
Who is involved in ongoing efforts?

Collaborative efforts have begun among representatives from 11 subbasins (Antelope, Bowman, Butte, Colusa, Corning, Los Molinos, Red Bluff, Sutter, Vina, Wyandotte Creek, Yolo), with facilitation support from the Consensus Building Institute. While efforts have focused on the subbasins mentioned, coordination will occur, as warranted, with other neighboring subbasins (Anderson and North Yuba).

What are the coordination priorities?

Groundwater Sustainability Agencies are working together to establish a foundation for open and transparent inter-basin coordination and communication by developing tools to:

- SHARE & COMPILE INFORMATION IN A CONSISTENT WAY
- OUTLINE A PROCESS TO IDENTIFY & RESOLVE ISSUES
- DOCUMENT COORDINATION EFFORTS



CBI
CATALYZING COLLABORATION

Learn More & Get Involved



Receive Updates
Sign up for your GSA's interested parties list.



Contact Your GSA
Talk to your GSA representative



Attend Meetings
Attend public workshops, Advisory Board, and GSA Board meetings

Subbasin	GSA(s)	Website
Antelope	Tehama County Flood Control and Water Conservation District (FCWCD)	Website
Bowman	Tehama County FCWCD	Website
Butte	Biggs West Gridley WD, Butte County, Butte WD, City of Biggs, City of Gridley, Colusa Groundwater Authority, Glenn County, RD 1004, RD 2106, Richvale ID, Western Canal WD	Website
Los Molinos	Tehama County FCWCD	Website
Red Bluff	Tehama County FCWCD	Website
Corning	Corning Sub-basin GSA, Tehama County FCWCD	Website
Colusa	Glenn Groundwater Authority; Colusa Groundwater Authority	Websites (Glenn) I (Colusa)
Sutter	Butte WD, City of Live Oak, Sutter Community Service District, Sutter County, Sutter Extension Water District, RD 70, RD 1660, RD 1500, City of Yuba City	Website
Vina	Rock Creek Reclamation District, Vina GSA	Websites (Vina) I (RCDC)
Wyandotte Creek	Wyandotte Creek GSA	Website
Yolo	Yolo Subbasin Groundwater Agency	Website



Find more information about regional inter-basin coordination at:
ButteCounty.net/waterresourceconservation/Sustainable-Groundwater-Management-Act/Inter-basin-Coordination

APPENDIX C

Memorandum of Understanding
Four County (Butte, Colusa, Glenn, and Tehama Counties)
Regional Water Resource Coordination, Collaboration, and Communication

Memorandum of Understanding
Four County (Butte, Colusa, Glenn, and Tehama Counties) Regional Water Resource Coordination, Collaboration, and Communication

1. BACKGROUND
The counties of Butte, Colusa, Glenn, and Tehama share common surface water and groundwater resources. Based on these common resources, local water resource managers understand that regular coordination, collaboration, and communication can result in an improved water resource understanding at both the county and regional level.

2. PURPOSE
The purpose of this document is to establish the mutual understandings of the four counties with respect to their voluntary joint efforts toward regional coordination, collaboration, and communication.

3. GOALS
The goals of the Four County Memorandum of Understanding (MOU) are:

2.1. To foster coordination, collaboration and communication between the four counties on water-related issues, to achieve greater efficiencies, and enhance public services.

2.2. To provide a framework for the management and disbursement of funding associated with activities pursued jointly under this MOU.

2.3. To improve competitiveness for State and Federal grant funding.

4. DEFINITIONS
4.1. Four County. Participants including the counties of Butte, Colusa, Glenn, and Tehama, with representation by the following:

- Butte County: Department of Water and Resource Conservation
- Colusa County: Department of Planning and Building
- Glenn County: Department of Agriculture
- Tehama County: Flood Control and Water Conservation District

4.2. Project Manager. A project manager will be determined by the Counties signatory to this MOU for any given project regardless of funding source to meet the goals set forth in this MOU.

5. MUTUAL UNDERSTANDINGS
5.1. Participation. Signatories to this MOU constitute the current participants. Participation is strictly on a voluntary basis and may be

terminated at any time without recourse. Neighboring counties who share water resources common to the participating counties and who are engaged in similar activities will be invited to be signatory to this MOU. Signatories aspire to work collaboratively with other regional programs and technical outreach efforts.

5.2. Activities. Efforts pursued under this agreement will remain consistent with and will not exceed the current authority for any individual participating county. Efforts will include the study and investigation of water resources common to participants, monitoring and reporting, information dissemination and sharing between counties and with other county departments, public outreach and education, and other activities at the agreement and direction of individual county governing bodies.

5.3. County Funding. Counties are not required to commit funding associated with activities completed under this MOU. It is understood that activities under this MOU may result in the more efficient use of existing and future department funding resulting from improved collaboration and coordination.

5.4. External Funding. Signatories will work collaboratively in pursuit of external funding associated with common interest activities based on voluntary participation and agreement. When required, a mutually agreed upon County representative will serve as the Project Manager for activities completed under a contract with an external funding source. Existing county contracting mechanisms will be utilized where available for contractual and invoicing purposes between participating counties. Nothing in this MOU precludes individual counties from the individual pursuit, contracting and completion of work from an externally funded source regardless of a real or perceived regional interest.

5.5. Decision-making. Consensus will be sought when the need for a decision arises.

5.6. Non-binding nature. This document and participation under this MOU are nonbinding, and in no way suggest that a county may not continue its own activities as each county is expected to continue its own policies and procedures and undertake efforts to secure project funding from any source. A county may withdraw from participation at any time.

5.7. Termination. Because the MOU will require periodic review and updating for use into the future, it is envisioned that the joint efforts of those involved will be ongoing in maintaining a living document. Thus this document will remain as a reflection of the understandings of the participants. Individual signatories of this MOU may terminate their involvement at any time with no recourse.

6. SIGNATORIES TO THE MEMORANDUM OF UNDERSTANDING

We, the undersigned representatives of our respective counties, acknowledge the above as our understanding of how the Four County Coordination, Collaboration, and Communication MOU will be implemented.

MAR 14 2006 APPROVED JAN 24 2006

Date

Curt Josiassen, Chairman
Butte County Board of Supervisors

2/28/06

Approved As To Form:
Bruce Alpert, Butte County Counsel

6. SIGNATORIES TO THE MEMORANDUM OF UNDERSTANDING
We, the undersigned representatives of our respective counties, acknowledge the above as our understanding of how the Four County Coordination, Collaboration, and Communicative MOU will be implemented.

Date April 4, 2006

By Christy Scofield

Christy Scofield, Chairperson
Colusa County Board of Supervisors

Approved As To Form:
Henry Rodegerdts, Colusa County Counsel

EXHIBIT B
PAGE 3 OF 3

6. SIGNATORIES TO THE MEMORANDUM OF UNDERSTANDING

We, the undersigned representatives of our respective counties, acknowledge the above as our understanding of how the Four County Coordination, Collaboration, and Communication MOU will be implemented.

12-13-05
Date

Vice Chairman, Tehama County Flood Control
And Water Conservation District

Approved As To Form:

by
County Counsel, Tehama County

Date

By Board Chair

County
Approved As To Form:

County Counsel

Date

By Board Chair

County
Approved As To Form:

County Counsel

Date

By Board Chair

County
Approved As To Form:

TEHAMA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT
MINUTE ORDER

December 13, 2005

8. Approval of Four-County Regional Water Resource Coordination- MOU: Ernie Ohlin reviewed that in August 2004, the Board authorized staff to participate in the four county water effort. The MOU attached is allowing all counties to participate together in water resource collaboration and communication. This non-binding voluntary MOU recognizes coordination among Butte, Colusa, Glenn and Tehama County.

Roger Sherrill encouraged the four-county groups to participate and noted in Item 5.1 "Participation" is strictly voluntary. Shasta County provides a major part of the recharge for the northern part of the Sacramento Valley and to move forward could only make for a stronger overall group.

Mark Black, Ag Commissioner for Glenn County, added this will be presented to Glenn County next Tuesday for support. Discussions with Sutter and Yuba County brings interest and they are awaiting the outcome of the four counties. This is a good collaborative effort, giving us strength of possible capturing of funding.

Motion by Director Warner to approve the MOU for signature.

Director Willard questioned if this has been reviewed by County Counsel. Upon his approval, signature will be completed.

Motion revised by Director Warner to approve the MOU for signature by the Chair upon review of County Counsel. Second by Director Avilla and carried by those present 3-0 with 2 absent.

Ayes: Directors':, Charles Willard; Ron Warner; Gregg Avilla
Noes: None
Absent or Not Voting: Director's: Ross Turner, George Russell

STATE OF CALIFORNIA)
) ss
COUNTY OF TEHAMA)

I, Gary Antone, Director of the Tehama County Flood Control and Water Conservation District of the County of Tehama, State of California, hereby certify the above and foregoing to be full, true and correct copy of an order adopted by said Tehama County Flood Control and Water Conservation District on this **13th day of December, 2005**

Dated: This 13th day of **December, 2005**.

Gary Antone
Director of the Tehama County Flood Control and Water Conservation District of the County of Tehama, State of California

By Linda Madea
Linda Madea, Deputy

F:\ADMIN\MEETING\MINORDER\05MinOrd\Dec.wpd

FOUR COUNTY MEMORANDUM OF UNDERSTANDING
ADDENDUM ONE:
Statement of Principles Regarding Water Related Programs and Projects

In recognition that certain activities related to water resources do not recognize jurisdictional boundaries and require regional solutions, the parties identified in the Four County Memorandum of Understanding hereby agree to adhere to the following Statement of Principles Regarding Water Related Programs and Projects:

1. Programs and projects related to groundwater level and water quality monitoring shall be conducted in a cooperative manner and related data shall be shared between the participants to prevent negative impacts to our constituents.
2. Environmental documents associated with water projects and programs will automatically be circulated to all four counties for review and comment.
3. Incidents of abnormal water level or water quality readings will be immediately communicated to all participating counties resulting in a collaborative review and dissemination of related information.
4. Project and program related information will be disseminated on a regional basis through the independent county websites, augmented by regional public outreach meetings.
5. The parties will work cooperatively to acquire grant funding to conduct aquifer studies that further identify the linkages of the common groundwater resources.
6. Efforts pursued under this agreement will remain consistent with and will not exceed the current authority of any participating county.

We, the undersigned representatives of our respective counties, agree to adhere to the conditions of **Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects.** The original MOU was signed by the Counties of Butte, Glenn, Colusa and Tehama in 2006.

Chair, Butte County Board of Supervisors	3/8/07 Date	County Counsel Approved As to Form	2/23/07 Date
Chair, Glenn County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Tehama County Board of Supervisors	Date	County Counsel Approved As to Form	Date

1

Vice-Chair, Colusa County
Board of Supervisors

4-17-07
Date

County Counsel
Approved As to Form

Date

EXHIBIT A
PAGE 2 OF 2

COUNTY CONTRACT
1788

FOUR COUNTY MEMORANDUM OF UNDERSTANDING
ADDENDUM ONE:
Statement of Principles Regarding Water Related Programs and Projects

In recognition that certain activities related to water resources do not recognize jurisdictional boundaries and require regional solutions, the parties identified in the Four County Memorandum of Understanding hereby agree to adhere to the following Statement of Principles Regarding Water Related Programs and Projects:

1. Programs and projects related to groundwater level and water quality monitoring shall be conducted in a cooperative manner and related data shall be shared between the participants to prevent negative impacts to our constituents.
2. Environmental documents associated with water projects and programs will automatically be circulated to all four counties for review and comment.
3. Incidents of abnormal water level or water quality readings will be immediately communicated to all participating counties resulting in a collaborative review and dissemination of related information.
4. Project and program related information will be disseminated on a regional basis through the independent county websites, augmented by regional public outreach meetings.
5. The parties will work cooperatively to acquire grant funding to conduct aquifer studies that further identify the linkages of the common groundwater resources.
6. Efforts pursued under this agreement will remain consistent with and will not exceed the current authority of any participating county.

We, the undersigned representatives of our respective counties, agree to adhere to the conditions of **Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects.** The original MOU was signed by the Counties of Butte, Glenn, Colusa and Tehama in 2006.

Chair, Butte County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Glenn County Board of Supervisors	4/3/2007 Date	County Counsel Approved As to Form	3/26/07 Date
Chair, Tehama County Board of Supervisors	Date	County Counsel Approved As to Form	Date

1

FOUR COUNTY MEMORANDUM OF UNDERSTANDING
ADDENDUM TWO:
Adding Sutter County to the Four County MOU

In recognition that certain activities related to water resources do not recognize jurisdictional boundaries and therefore require regional solutions, the parties identified in the original Four County Memorandum of Understanding: Counties of Butte, Colusa, Glenn and Tehama are hereby joined by Sutter County in the regional efforts discussed in the Four County MOU and the Statement of Principles Regarding Water Related Programs and Projects as discussed in Addendum One to the Four County MOU.

We, the undersigned as representative of our respective counties, agree to adhere to the conditions of the **Four County Memorandum of Understanding; Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects. And Addendum Two: Adding Sutter County to the Four County MOU.**

The original MOU was signed by the Counties of Butte, Glenn, Colusa and Tehama in 2006. Through approval of this addendum, Sutter County makes the same commitment to regional cooperation and coordination that is outlined in the original MOU.

Bill Connelly	05 MAY 2009	Bruce L. Alpert	
Chair, Butte County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Glenn County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Tehama County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Colusa County Board of Supervisors	Date	County Counsel Approved As to Form	Date

C09-082

FOUR COUNTY MEMORANDUM OF UNDERSTANDING
ADDENDUM TWO:
Adding Sutter County to the Four County MOU

In recognition that certain activities related to water resources do not recognize jurisdictional boundaries and therefore require regional solutions, the parties identified in the original Four County Memorandum of Understanding: Counties of Butte, Colusa, Glenn and Tehama are hereby joined by Sutter County in the regional efforts discussed in the Four County MOU and the Statement of Principles Regarding Water Related Programs and Projects as discussed in Addendum One to the Four County MOU.

We, the undersigned as representative of our respective counties, agree to adhere to the conditions of the **Four County Memorandum of Understanding; Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects. And Addendum Two: Adding Sutter County to the Four County MOU.**

The original MOU was signed by the Counties of Butte, Glenn, Colusa and Tehama in 2006. Through approval of this addendum, Sutter County makes the same commitment to regional cooperation and coordination that is outlined in the original MOU.

Chair, Butte County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Glenn County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Tehama County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Colusa County Board of Supervisors	5/5/09 Date	County Counsel Approved As to Form	Date 5/5/09

C09-082

FOUR COUNTY MEMORANDUM OF UNDERSTANDING
ADDENDUM TWO:
Adding Sutter County to the Four County MOU

In recognition that certain activities related to water resources do not recognize jurisdictional boundaries and therefore require regional solutions, the parties identified in the original Four County Memorandum of Understanding: Counties of Butte, Colusa, Glenn and Tehama are hereby joined by Sutter County in the regional efforts discussed in the Four County MOU and the Statement of Principles Regarding Water Related Programs and Projects as discussed in Addendum One to the Four County MOU.

We, the undersigned as representative of our respective counties, agree to adhere to the conditions of the **Four County Memorandum of Understanding; Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects. And Addendum Two: Adding Sutter County to the Four County MOU.**

The original MOU was signed by the Counties of Butte, Glenn, Colusa and Tehama in 2006. Through approval of this addendum, Sutter County makes the same commitment to regional cooperation and coordination that is outlined in the original MOU.

Chair, Butte County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Glenn County Board of Supervisors	5/21/09 Date	County Counsel Approved As to Form	Date
Chair, Tehama County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Colusa County Board of Supervisors	5/5/09 Date	County Counsel Approved As to Form	5/5/09 Date

Chair, Sutter County
Board of Supervisors

Date

William J. Vanasek

County Counsel
Approved as to Form

4/14/09
Date

FOUR COUNTY MEMORANDUM OF UNDERSTANDING
ADDENDUM TWO:
Adding Sutter County to the Four County MOU

In recognition that certain activities related to water resources do not recognize jurisdictional boundaries and therefore require regional solutions, the parties identified in the original Four County Memorandum of Understanding: Counties of Butte, Colusa, Glenn and Tehama are hereby joined by Sutter County in the regional efforts discussed in the Four County MOU and the Statement of Principles Regarding Water Related Programs and Projects as discussed in Addendum One to the Four County MOU.

We, the undersigned as representative of our respective counties, agree to adhere to the conditions of the **Four County Memorandum of Understanding; Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects. And Addendum Two: Adding Sutter County to the Four County MOU.**

The original MOU was signed by the Counties of Butte, Glenn, Colusa and Tehama in 2006. Through approval of this addendum, Sutter County makes the same commitment to regional cooperation and coordination that is outlined in the original MOU.

Chair, Butte County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Glenn County Board of Supervisors	Date	County Counsel Approved As to Form	Date
George Runner Chair, Tehama County Flood Control & Water Conservation District	6-23-09 Date	County Counsel Approved As to Form	Date
Chair, Colusa County Board of Supervisors	Date	County Counsel Approved As to Form	Date

FOUR COUNTY MEMORANDUM OF UNDERSTANDING:
ADDENDUM THREE
Expression of a Commitment to Begin An
Integrated Regional Water Management Planning Process
Within the Counties of Butte, Colusa, Glenn, Tehama and Sutter

Through adoption of this addendum, the signatories agree to begin a regional water management planning process pursuant to the Four County MOU, geographically covering the area of Butte, Colusa, Glenn, Tehama and Sutter Counties. The planning process shall utilize and incorporate existing plans and processes. The California legislature has recently adopted new criteria associated with the Integrated Regional Water Management Planning process. This new legislative criteria requires that acceptance and approval of the composition of all Integrated Regional Water Management Planning Areas be completed prior to accepting public funding associated with IRWMP grant funds. All IRWMP planning Regions and Plans must comply with the requirements as set forth in the Final Regional Acceptance Process Program Guidelines.

We, the undersigned as representative of our respective counties, agree to adhere to the conditions of **The Four County Memorandum of Understanding; Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects; Addendum Two: Adding Sutter County to the Four County MOU; Addendum Three: Expression of a Commitment to Begin An Integrated Regional Water Management Planning Process Within the Counties of Butte, Colusa, Glenn, Tehama and Sutter.**

Bill Connelly	05 MAY 2009	Bruce L. Alpert	
Chair, Butte County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Glenn County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Tehama County Board of Supervisors	Date	County Counsel Approved As to Form	Date

Chair, Colusa County Board of Supervisors	5/5/09 Date	County Counsel Approved As to Form	5/5/09 Date
Chair, Sutter County Board of Supervisors	Date	County Counsel Approved as to Form	Date

C09-095
5-5-09

FOUR COUNTY MEMORANDUM OF UNDERSTANDING:
ADDENDUM THREE
Expression of a Commitment to Begin An
Integrated Regional Water Management Planning Process
Within the Counties of Butte, Colusa, Glenn, Tehama and Sutter

Through adoption of this addendum, the signatories agree to begin a regional water management planning process pursuant to the Four County MOU and geographically covering the area of Butte, Colusa, Glenn Tehama and Sutter Counties. The planning process shall utilize and incorporate existing plans and processes. The California legislature has recently adopted new criteria associated with the Integrated Regional Water Management Planning process. This new legislative criteria requires that acceptance and approval of the composition of all Integrated Regional Water Management Planning Areas be completed prior to accepting public funding associated with IRWMP grant funds. All IRWMP planning Regions and Plans must comply with the requirements as set forth in the Final Regional Acceptance Process Program Guidelines.

We, the undersigned as representative of our respective counties, agree to adhere to the conditions of **The Four County Memorandum of Understanding; Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects; Addendum Two: Adding Sutter County to the Four County MOU; Addendum Three: Expression of a Commitment to Begin An Integrated Regional Water Management Planning Process Within the Counties of Butte, Colusa, Glenn, Tehama and Sutter.**

Chair, Butte County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Glenn County Board of Supervisors	5/21/09 Date	County Counsel Approved As to Form	Date
Chair, Tehama County Board of Supervisors	Date	County Counsel Approved As to Form	Date

Chair, Colusa County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Sutter County Board of Supervisors	Date	County Counsel Approved as to Form	Date

FOUR COUNTY MEMORANDUM OF UNDERSTANDING:
ADDENDUM THREE
Expression of a Commitment to Begin An
Integrated Regional Water Management Planning Process
Within the Counties of Butte, Colusa, Glenn, Tehama and Sutter

Through adoption of this addendum, the signatories agree to begin a regional water management planning process pursuant to the Four County MOU and geographically covering the area of Butte, Colusa, Glenn, Tehama and Sutter Counties. The planning process shall utilize and incorporate existing plans and processes. The California legislature has recently adopted new criteria associated with the Integrated Regional Water Management Planning process. This new legislative criteria requires that acceptance and approval of the composition of all Integrated Regional Water Management Planning Areas be completed prior to accepting public funding associated with IRWMP grant funds. All IRWMP planning Regions and Plans must comply with the requirements as set forth in the Final Regional Acceptance Process Program Guidelines.

We, the undersigned as representative of our respective counties, agree to adhere to the conditions of **The Four County Memorandum of Understanding; Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects; Addendum Two: Adding Sutter County to the Four County MOU; Addendum Three: Expression of a Commitment to Begin An Integrated Regional Water Management Planning Process Within the Counties of Butte, Colusa, Glenn, Tehama and Sutter.**

Chair, Butte County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Glenn County Board of Supervisors	Date	County Counsel Approved As to Form	Date
George Lowell Chair, Tehama County Flood Control & Water Conservation District	6-23-09 Date	County Counsel Approved As to Form	Date

FOUR COUNTY MEMORANDUM OF UNDERSTANDING:
ADDENDUM FOUR
Expression of a Commitment to Begin An
Integrated Regional Water Management Planning Process
Within the Counties of Butte, Colusa, Glenn, Tehama, Sutter and Shasta

Through adoption of this addendum, the signatories agree:

1. Shasta County shall join the parties involved in the original Four County Memorandum of Understanding (MOU) and Addendum Two;

2. Signatories to the MOU and its addenda shall be called the Northern Sacramento Valley Integrated Regional Water Management Planning Group; and,

3. Begin a regional water management planning process pursuant to the Four County MOU, geographically covering the area of Butte, Colusa, Glenn, Tehama, Sutter and Shasta Counties. The planning process shall utilize and incorporate existing plans and processes. The California legislature has recently adopted new criteria associated with the Integrated Regional Water Management Planning process. This new legislative criteria requires that acceptance and approval of the composition of all Integrated Regional Water Management Planning Areas be completed prior to accepting public funding associated with IRWMP grant funds. All IRWMP planning Regions and Plans must comply with the requirements as set forth in the Final Regional Acceptance Process Program Guidelines.

4. The signatories to the MOU and its addenda reaffirm the provisions of section 5.6 of the MOU that the MOU and its addenda and participation under the MOU and its addenda are nonbinding.

We, the undersigned as representative of our respective counties, agree to adhere to the conditions of **The Four County Memorandum of Understanding; Addendum One to the Four County MOU: Statement of Principles Regarding Water Related Programs and Projects; Addendum Two: Adding Sutter County to the Four County MOU; Addendum Three: Expression of a Commitment to Begin An Integrated Regional Water Management Planning Process Within the Counties of Butte, Colusa, Glenn, Tehama and Sutter; Addendum Four: Expression of a Commitment to Begin An Integrated Regional Water Management Planning Process Within the Counties of Butte, Colusa, Glenn, Tehama, Sutter and Shasta.**

Bill Connelly — Chair, Butte County Board of Supervisors

APR 13 2010 — Date

County Counsel Approved As to Form

4.9.10 — Date

Chair, Glenn County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Tehama County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Colusa County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Sutter County Board of Supervisors	Date	County Counsel Approved as to Form	Date
Chair, Shasta County Board of Supervisors	4/27/10 Date	County Counsel Approved as to Form	5/6/10 Date

Chair, Glenn County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Tehama County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Colusa County Board of Supervisors	Date	County Counsel Approved As to Form	Date
Chair, Sutter County Board of Supervisors	4/20/10 Date	County Counsel Approved as to Form	4/13/10 Date
Chair, Shasta County Board of Supervisors	Date	County Counsel Approved as to Form	Date

Appendix D: Issue Resolution Process for Discussion Purposes

This document aims to guide discussions and provide pertinent information as subbasins consider inclusion of an issue resolution process in the Northern Sacramento Valley inter-basin coordination framework. These discussions will take place in the period leading up to the first five-year GSP update.

Discussion Prompts

1. *What are potential benefits/challenges or concerns of including an issue/dispute resolution process in the inter-basin coordination framework?*
2. *What are shared expectations between and among subbasins?*
3. *What are the GSAs preferences for addressing conflicts if/when they arise?*

Background

The Groundwater Sustainability Plan Regulations in Article 8 recommend including a "description of a process for identifying and resolving conflicts between Agencies" as a part of inter-basin coordination (Sections 10727.2, 10733, and 10733.2, Water Code). A recent study by Tara Moran, Janet Martinez, and William Blomquist, part of Stanford University's Water in the West found that the ability of interagency coordination "to solve complex challenges will be contingent on the ability of these organizations to effectively prevent and manage conflicts before they arise and to resolve these conflicts equitably and efficiently when they do." (Moran, Martinez, and Blomquist, 2021). Further, given how likely it is for disagreements at a local level to occur during SGMA implementation, the study suggests investing in establishing issue resolution processes before disagreements arise. Meanwhile, deferring their development could complicate the resolution process in times of conflict. Given these recommendations, consider the following questions for reflection and discussion.

Purposes of issue resolution processes

There are many options to identify and resolve issues that involve different parties, goals/objectives, and resources. Ideally, issue resolution processes are thoughtfully designed and tailored to specific contexts. **The broader goal for such a process can be to meet the agencies' long-term needs, considering local dynamics, desired outcomes, and expected uses**. Goals can include keeping things simple and efficient, maintaining relationships, ensuring quality of the process, fostering participation and community engagement, etc.

The figure below shows different types of dispute resolution processes. In some cases, agencies draft clauses that outline a tiered approach. They often begin with negotiation, which gives the parties control over the process and outcomes. Then, mediation, which brings in a neutral third-party (mediator) to facilitate the discussion and help parties work towards resolving issues. Often, negotiation and mediation lead to "non-binding" outcomes, non-enforceable by courts. Parties could opt to move towards arbitration or litigation, which are controlled by a third party (arbitrator or judge/jury) and can lead to binding and non-binding outcomes (Moran, Martinez, and Blomquist, 2019).

Figure 2. The spectrum of dispute resolution process. Modified from Amsler et al. (2020a).



Negotiation	Mediation	Arbitration	Trial
• No third party	• Third part (mediator)	• Third party (arbitrators)	• Third party (judge/jury)
• Non-binding	• Non-binding	• Non-binding or binding	• Binding

From Moran, Martinez, and Blomquist, 2019

Examples

1. Example from Moran, Martinez, and Blomquist, 2019

Box 2. A Draft Dispute Resolution Clause.

The blue text notes indicate how each of the preceding five questions are incorporated into the dispute resolution language.

In the event that any dispute [Q1: Provides instruction on what disputes can be addressed. Additional process goals, while not explicit should be subject to discussion.] arises among the Members relating to (i) this Agreement, (ii) the rights and obligations arising from this Agreement, (iii) a Member proposing to withdraw from membership in the Agency, or (iv) a Member proposing to initiate litigation within the Basin or the management of the Basin, the aggrieved Member or Members proposing to withdraw from membership shall provide written notice to the other Members of the controversy or proposal to withdraw from membership [Q2: Provides instruction on who can initiate and participate in the process.]. Within forty-five (45) days after such written notice, the Members shall attempt in good faith to resolve the controversy through informal negotiation [Q3: Describes a series of processes for dispute resolution, beginning with negotiation. Also includes a timeline for process stages.]. If the Members cannot agree upon a resolution of the controversy within forty-five (45) days from the providing of written notice specified above, the dispute shall be submitted to mediation prior to commencement of any legal action or prior to withdrawal of a Member proposing to withdraw from membership. The mediation shall be no less than a full day (unless agreed otherwise among the Members) and the cost of mediation shall be paid in equal proportion among the Members [Q4: Provides instruction on who will pay for dispute resolution processes.]. The mediator shall be either voluntarily agreed to or appointed by the Superior Court upon a suit and motion for appointment of an impartial mediator [Q3a: Provides a clear process for choosing an impartial mediator.]. Upon completion of mediation, if the controversy has not been resolved, any Member may exercise all rights to bring a legal action relating to the controversy or withdraw from membership as otherwise authorized pursuant to this Agreement. The Agency may, at its discretion, participate in mediation upon request by a stakeholder [to be defined by the parties to the Agreement] concerning a dispute alleged by the stakeholder concerning the management of the Basin or rights to extract groundwater from the Basin, with the terms of such mediation to be determined in the sole discretion of the Member Directors [Q2: Allows third-party participation in the dispute resolution process].

Note: This above dispute resolution clause is not intended to serve as an endorsement or illustration of effective practice.

2. Example from Butte Subbasin Cooperation Agreement

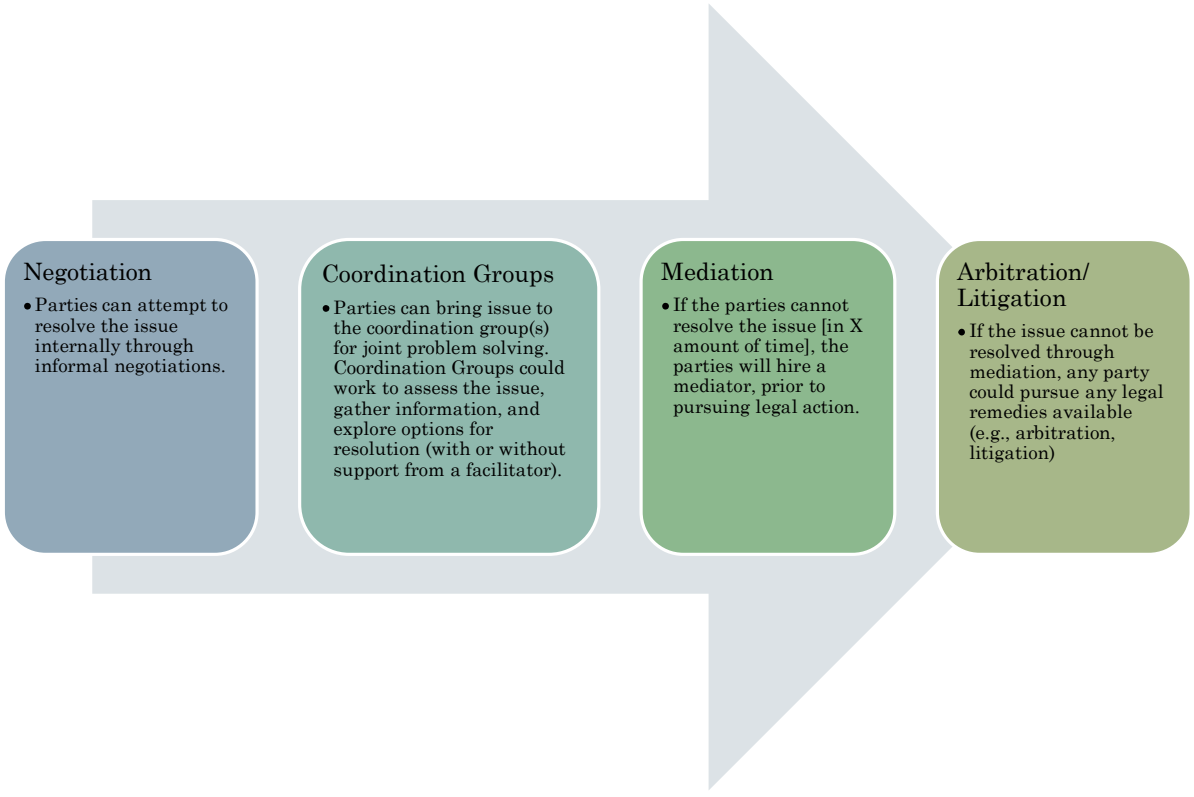
Note: This example doesn't provide much specificity. However, acknowledges shared intent to resolve disputes.

ARTICLE 9. DECISION-MAKING AND DISPUTE RESOLUTION

9.1. Decision-making Authority. Topics where the Members desire coordinated decision-making will be considered by the Advisory Board, and the Member Directors will strive for unanimous recommendations that will be presented to each Member's governing body for consideration. Such topics include, but are not limited to, development and implementation of the GSP, and associated financial arrangements. When unable to reach unanimous recommendations, the Advisory Board will outline the areas in which it does not agree, providing some explanation to inform the respective GSAs' governing bodies. Despite the recommendations of the Advisory Board, ultimate decision-making authority for topics considered by the Advisory Board resides with each Member's governing body.

9.2. Dispute Resolution. It is the desire of Members to informally resolve all disputes and controversies related to this Agreement, whenever possible, at the least possible level of formality and cost. If a dispute occurs, the disputing Members shall meet and confer in an attempt to resolve the matter. If informal resolution cannot be achieved, the matter will be referred to the Advisory Board for resolution. The Advisory Board may engage the services of a trained mediator or resort to all available legal and equitable remedies to resolve disputes.

Possible Process in the Northern Sacramento Valley



Worksheet: Key Questions and Considerations for Issue Resolution Process

The questions below could be used to guide the development of a specific issue resolution process in the context of inter-basin coordination in the Northern Sacramento Valley by the first 5-year GSP update. These questions could help to clarify the level of specificity that subbasins would find beneficial and mutually agreeable when/if conflict occurs.

Adapted from Moran, Martinez, and Blomquist, 2019

1) What are the process goals? a) Consider what disputes the process aims to address – all disputes arising at basin boundaries or only a subset? b) Consider inclusivity and transparency of the process, cost efficiency for parties and the GSA(s), timeframes, and other factors important to your agency(ies). c) Other potential objectives include dispute prevention, enhanced relationships, procedural and substantive fairness, legal compliance, durability of resolution and organizational improvement.	
2) Who can initiate and participate in the dispute resolution process? a) Consider what parties can initiate the dispute resolution process – is it only parties to the agreement or can external parties invoke it? There are pros and cons to both choices, so discussing this in advance will ensure thoughtful consideration.	
3) What processes are used to make decisions related to dispute resolution and what information is necessary? a) What is the process for selecting a mediator, facilitator, lawyer or other impartial party? b) Consider including a range of processes beginning with internal negotiations and escalating based on clear timelines.	
4) Who pays for the dispute resolution process? a) Consider who will pay for the mediator, facilitator, lawyer or other impartial party. Will it be paid for by the disputing parties, the GSA(s) or through a state-funded program? b) How could you assess whether the outcome of the dispute resolution process was successful?	

Other Resources

- Dutton, A. SGMA Updates, Coordination Considerations, and Potential Next Steps, Cosumnes Subbasin Working Group. February 21, 2018. http://cosumnes.waterforum.org/wp-content/uploads/2018/02/EKI_Cosumnes_TAC_meeting_2018-02-21.pdf
- Moran T., Martinez, J., and Blomquist W. Dispute Resolution Processes: Thinking through SGMA Implementation. Water in the West. Fall, 2019. https://waterinthewest.stanford.edu/publications/dispute-resolution-processes-thinking-through-sgma-implementation
- Moran T. Basin-scale Coordination is Key to SGMA's Success: Thoughts on DWR's Draft GSP Regulations. March 1, 2016. Stanford University. Water in the West. https://waterinthewest.stanford.edu/news-events/news-press-releases/basin-scale-coordination-key-sgma%E2%80%99s-success-thoughts-dwr%E2%80%99s-draft-gsp
- Moran et al. Dispute Resolution Clauses in Interorganizational Coordination Agreements: A Comparative Analysis. 2021. pending publication.
- Butte County. 2017. Technical Collaboration on Interconnected Subbasins to Advance Sustainable Groundwater Management: Assessment of Interconnected Subbasins. Available at: https://www.buttecounty.net/wrcdocs/Reports/SpecialProjects/InterbasinGWFlow/InterbasinSBAssessment-FINAL.pdf
- Butte County. 2017. Inter-basin Groundwater Flows Fact Sheet. Available at: https://www.buttecounty.net/wrcdocs/Reports/SpecialProjects/InterbasinGWFlow/FactSheet.pdf
- Buck, Christina. 2017. Butte County Inter-Basin Groundwater Flows Presentation, https://www.buttecounty.net/wrcdocs/Reports/SpecialProjects/InterbasinGWFlow/NSVBoardAssessment20170615.pdf