

# Corning Subbasin Groundwater Sustainability Plan

Technical Presentation

**Presented to Corning Subbasin Advisory Board  
11/10/2021 | Corning City Council Chambers and  
Teleconference**

Prepared by  
 **MONTGOMERY  
& ASSOCIATES**



# Agenda and Meeting Objective


## AGENDA

- Review overall public comments received on Public Draft GSP
- Review general types of responses
- Review minor revisions to draft GSP to respond to comments
- Next steps for GSP adoption and implementation

## MEETING OBJECTIVE


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





# Comments Received on Public Draft GSP





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

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

# Summary of Public Comments Received on Draft GSP

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

## **Materials in Meeting Packet:**

- Summary of public comments and discussion at two Public Workshops
- List of all public comments received during 45-day comment period

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

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

# Landowner and Stakeholder Comments/Responses

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



# Agricultural Interest Group Comments/Responses

## ➤ Deseret Farms of California

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



# Paskenta Band Of Nomlaki Indians

## Comments/Responses

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

## Example addition of Tribes in all aspects of GSP stakeholder coordination

### ▶ Section 6 Sustainability Goal:

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

# Local Agency Comments/Responses

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

# NGO Consortium Comments/Responses

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

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



## NGO Consortium comments/Responses

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

# Federal Agency (NMFS, BIA) Comments/Responses

## ➤ NMFS:

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

## ➤ BIA:

- **Commented on model uncertainties and the characterization of groundwater volume in storage in the aquifer; will provide clarifications**

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

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

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

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



## Remaining Questions and Comments on Draft GSP?

- GSA Staff remarks
- CSAB feedback
- Public comment





## Potential Action Item

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



# Next Steps for GSP Adoption and Implementation



## Schedule of Activities

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

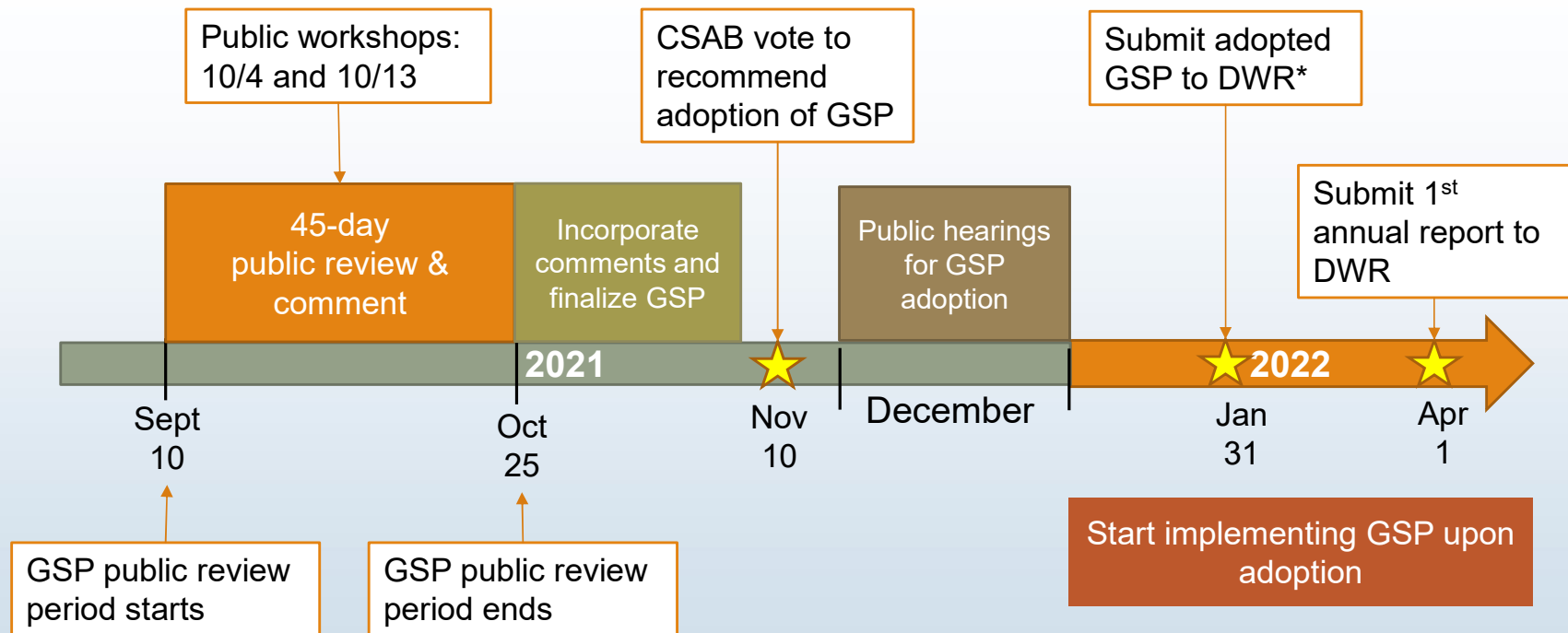


# Timeline Recap



**Stay involved! Additional current and upcoming discussion topics include:**

- Long-term funding discussions
- Projects, coordination, and partnerships
- Monitoring and addressing data gaps



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



# What to Expect During GSP Implementation

## ➤ GSA Governance:

- Review MOU/MOA
- Subbasin GSA Coordination
- Budget Planning and Funding Oversight

## ➤ Outreach and Coordination:

- Public Outreach and Notifications
- Interbasin Coordination
- CSAB and GSA Committee and Board Meetings

## ➤ Monitoring and Reporting

- Required annual and 5 year updates
- Coordination with DWR
- Data collection and address data gaps
- Oversight of consultants or contractors

## ➤ Project and Management Actions

- Grant applications and management
- Coordinate with partner agencies

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



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

- GSA Staff remarks
- CSAB feedback
- Public comment



# End of Meeting