3. SUSTAINABLE MANAGEMENT CRITERIA

SMC offer guideposts and guardrails for groundwater managers seeking to achieve sustainable groundwater management. 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. 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.

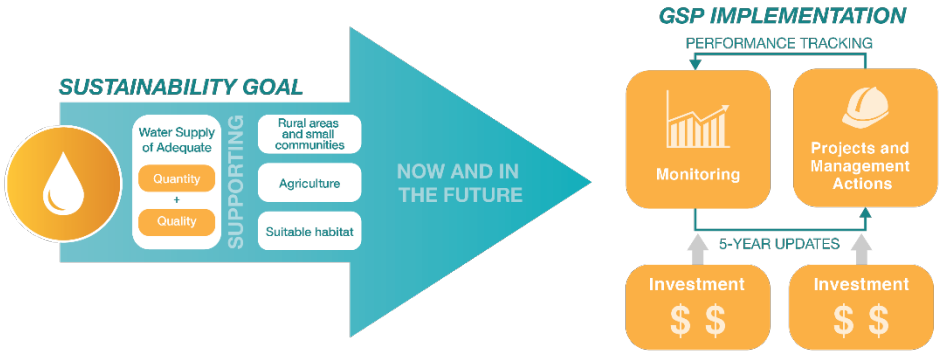

Figure 3-1: Flow Chart for Sustainability

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 within the Wyandotte Creek Subbasin. 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 are 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.

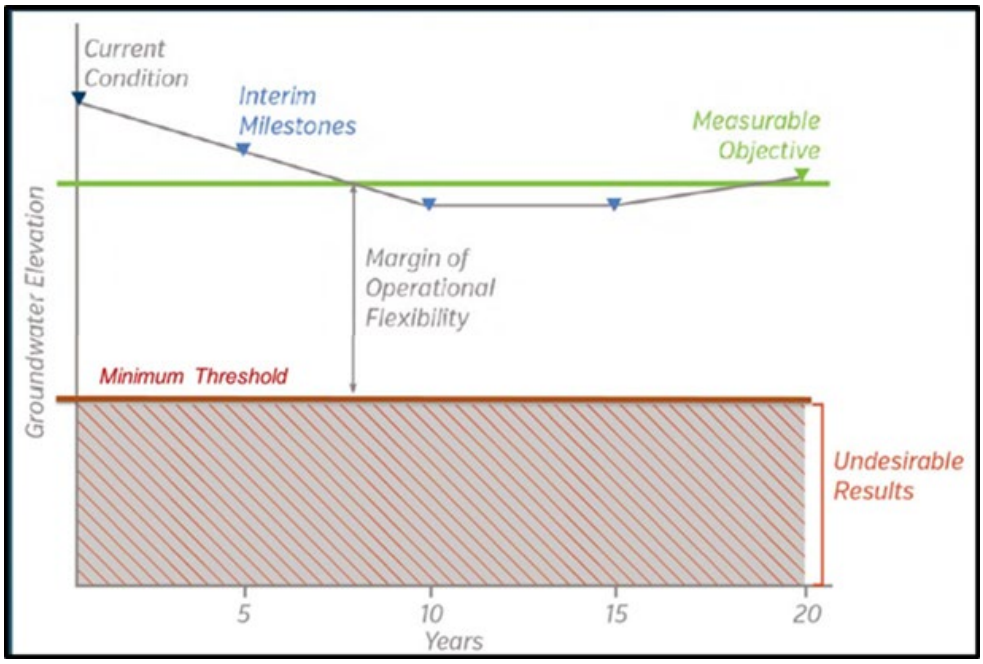

Figure 3-2: Illustration of Terms Used for Describing Sustainable Management Criteria Using the Groundwater Level SI

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 updates
- 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

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.*

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 potential impacts of declining groundwater levels.

Potential impacts identified by stakeholders from declining groundwater levels included:

- Wells going dry
- Reduced pumping capacity of existing wells
- Need for deeper well installations and/or lowering of pumps
- Increased pumping costs due to greater lift
- Reduced flows in rivers and streams supporting aquatic ecosystems

Issues related to reduced flows in rivers and streams and/or water tables that support aquatic ecosystems are addressed in the Interconnected Surface Water SMC (Section 3.8). As stated in this section, data are not available to assess these issues and are a data gap for the GSP. Section 3.8 also provides the framework to provide the data to develop SMC for these components.

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 Level MT. From a policy perspective, sustainably constructed domestic wells going dry during non-dry year conditions 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 within a management area reach their MT for two consecutive non-dry year-types.*

Non-dry year types include those with wet, above normal, and below normal classifications as defined by the Sacramento Valley Water Year Index. Dry year types include those with dry and

critical classifications. See Section 2.3.1 for more information on the Sacramento Water Year Index.

As shown in the figures presented in Appendix 3-A showing the average depth of domestic, irrigation, and public supply wells, domestic wells are generally shallower than other wells throughout the Vina Subbasin. These figures were constructed using data from DWR OSWRC. Protection of domestic wells was therefore deemed to be additionally protective of other well types, such as agricultural wells. 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 during drought years. Impacts to domestic wells and other groundwater uses may occur and would not constitute an Undesirable Result. Local and state drought response 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.

In order to establish appropriate MT levels protective of sustainably constructed domestic wells, a representative zone is established for each RMS well. The DWR domestic well 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, groundwater surface elevation of the well, 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.

To refine the dataset, wells installed before 1980 were removed. 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.

The MT was developed using the refined dataset by removing the 15% most shallow wells based on the elevation of the bottom of the wells within a 3-mile radius of the RMS well (see figures in Appendix 3-B). The percentile analysis is based on the statistical calculation of domestic well depths (translated to elevation amsl) in the DWR domestic well database for wells completed after 1980. Box and whisker plots were used to calculate the MT using this method. Box plots are a method for graphically depicting groups of numerical data through their quartiles. Box plots may also have lines extending vertically from the boxes (whiskers) indicating variability outside the upper and lower quartiles, hence the terms box-and-whisker plot. Box plots are non-parametric: they display variation in samples of a statistical population without making any assumptions of the underlying statistical distribution. The spacings between the different parts of the box indicate the degree of dispersion (spread) and skewness in the data. An illustration of the box and whisker plot is provided in Appendix 3-B.

A description of this method is as follows: a MT of 50 feet amsl at an RMS having 100 domestic wells within a 3-mile radius means that 15 wells within that radius 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 85 wells have been completed at an elevation below 50 feet amsl (and are therefore not vulnerable to going dry). The fifteenth-percentile MT assigned to each RMS 3-mile radius is protective of at least 85% of all domestic wells within its 3-mile radius. Some wells that fall above the MT may not "go dry" even if the MT is reached at the RMS well due to differences in groundwater elevation conditions within the RMS zone 3-mile radius. 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 two or more consecutive dry and/or critically dry year types is not considered significant and unreasonable and therefore not considered an undesirable result, as long as the groundwater levels rebound to values greater than the MT following those consecutive dry and/or critically dry years and should return to MO levels.

Appendix 3-B contains the box and whisker plots for each RMS.

3.3.3 Measurable Objectives

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 at the year 2042. To establish the MO, the water-level hydrograph of observed groundwater levels at each RMS was evaluated. The historical record at these locations shows cyclical fluctuations of groundwater level over a four- to seven-year cycle consistent with variations in water year type according to the Sacramento Valley Water Year Hydrologic Classification. Groundwater levels are typically lower during dry years and higher during wet years. Superimposed on this four- to seven-year short-term cycle is a long-term decline in groundwater levels. In other words, groundwater levels during more recent dry-year cycles are lower than groundwater levels in earlier dry-year cycles.

The wet-dry cycles are climatically induced, and the GSA has no ability to change this cyclical behavior; there will always be short-term cyclical fluctuations in groundwater levels. The MO are therefore intended to address the long-term trend of the "peaks and valleys" of the short-term cycles and stop the long-term decline in groundwater levels during dry years. Because the GSA cannot immediately augment water supply and/or reduce water demand, some continuation of the long-term decline in groundwater levels is expected in the near future. Currently (in 2021), the Wyandotte Creek subbasin appears to be coming out of a wet period (2017 and 2019 being wet years) of a short-term cycle and beginning the next dry period of the short-term cycle starting in 2020. The MO was therefore based on the trend line of observed historical data extended to the year 2030. The year 2030 was chosen as a reasonable time frame in which the GSA could implement projects and management actions to address long-term groundwater level decline while recognizing that groundwater levels may experience another dry period of the short-term cycle in the intervening years. The MO for the Groundwater Levels SMC is (Figure 3-3):

the groundwater level based on the groundwater trend line for the dry periods (over the period of record) of observed short-term climatic cycles extended to 2030.

Figure 3-3: Illustration of Long-Term Trend Using Historical Water Levels Extended to 2030 for Development of Measurable Objectives

The projection of groundwater levels for each RMS was based on a simple non-statistical linear projection of the observed data. Generally, the lowest groundwater levels of a given cycle were used for the projection, unless they appeared to be outliers relative to the general long-term trend of the dry years in the cycle.

IM for groundwater levels between 2022 and 2042 were interpolated based on the linear projection of groundwater level at each RMS. Using a projection based on the dry years of the short-term cycle, it will be important to assess IM relative to dry years as they occur, rather than at fixed 5-year intervals. By projecting based on the dry years in the cycle, the observed groundwater levels may be higher than the IM. This will be addressed in the annual reports and interim GSP updates based on what occurs with respect to the short-term cycles in the future. Appendix 3-C contains the hydrographs with projected data used to develop MO and IMs for each RMS.

3.3.4 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 certain ranges at each RMS shown in Table 3-1. (See Section 4, Figure 4-5, and Table 4-6 for relevant information on the RMS for groundwater levels.)

Table 3-1: Groundwater Levels Sustainable Management Criteria by Representative Monitoring Site in Feet Above Mean Sea Level

RMS Well ID	MT	MO	Interim Milestone		
			2027	2032	2037
Wyandotte Creek Subbasin – Oroville Management Area					
16Q001M	85	133	134	133	133
32P001M	78	107	108	106	106
CWS-03	102	133	135	132	132
Wyandotte Creek Subbasin – South Management Area					
13B002M	35	47	48	46	46
09N002M	35	49	51	47	47
25N001M	37	52	53	52	52
08M001M	59	86	87	85	85
16C001M	71	95	96	95	95
31F001M	76	99	101	98	98

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 within a management area reach their MT for two consecutive non-dry year-types.*

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

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:

> *groundwater pumping compromises the Subbasin's ability to achieve its Sustainability Goal. This occurs in the Wyandotte Creek subbasin when two RMS wells over the entire Wyandotte Creek Subbasin exceed their MT for two consecutive non-dry 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 Minimum Threshold

The Water Quality MT 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 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.

For the Wyandotte Creek Subbasin undesirable result is considered "significant and unreasonable" if groundwater quality degrades such that the specific conductance exceeds the upper Secondary MCL of 1,600 µS/cm. There are no public health goal or primary MCL goal associated with specific conductance. The MT for the Water Quality Secondary MCL is:

> *the upper Secondary MCL for specific conductance based on the State Secondary Drinking Water Standards.*

In Wyandotte Creek Oroville, undesirable results have not been reported historically, are not currently occurring, and are not expected to occur in the future. Observations of specific conductance at RMS from 2001 through 2019 ranged between 346 and 390 µS/cm and demonstrated no trend. In Wyandotte Creek South undesirable results related to water quality as a result possibly due to groundwater pumping have been reported in one well, 18N04E28L001M (Figure 4-6), with data collected in the 1970s and 1980s. The last reported value of specific conductance was greater than 2,000 µS/cm for a sample collected in 1986. No samples have been collected in this area since that time. These results may also be naturally occurring within this well (total depth 190 feet bgs) and not due to groundwater pumping. If access cannot be obtained

for the proposed RMS well in this area, then a new RMS well will be installed. Although there have been no reported undesirable results due to groundwater pumping in this area, other RMS wells in Wyandotte Creek South have not been sampled for specific conductance. The proposed sampling schedule for these wells will provide the data by the first 5-year update to assess if undesirable results occur in this area.

3.5.3 Measurable Objective

The Water Quality MO represents a quantitative target that establishes a point above the MT 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 the recommended Secondary MCL of 900 µS/cm based on State Secondary Drinking Water Standards as discussed above for the MT. The MO for the Water Quality SMC is:

> *the recommended Secondary MCL for specific conductance based on the State Secondary Drinking Water Standards.*

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.

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 at each RMS shown in Table 3-2. (See Section 4, Figure 4-6)

Table 3-2: Water Quality Sustainable Management Criteria by Representative Monitoring Site in µS/cm

GSP Well ID	MT	MO	IM		
			2027	2032	2037
Wyandotte Creek Subbasin – Oroville Management Area					
16Q001M	1,600	900	900	900	900
CWS-02					
Wyandotte Creek Subbasin – South Management Area					
08M001M	1,600	900	900	900	900
18C001M[1] 18C002M 18C003M					
28L001M[2]					
13B002M					

Note:

1. New nested well (wells completed in same borehole) installed by DWR under TSS Grant.
2. If access cannot be obtained for this well, new well will be obtained.

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.

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 disrupt critical infrastructure or development of projects in a manner that is inconsistent with the Sustainability Goal.*

Land subsidence typically occurs concurrently or shortly after significant declines in groundwater levels, therefore measured changes in groundwater levels can serve as a proxy for potential land subsidence. For this reason, the SMC developed for groundwater levels are used for land subsidence to ensure avoidance of the undesirable result.

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

> *Two RMS wells within a management area reach their MT for two consecutive non-dry year-types.*

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. 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 subsidence monitoring network includes six GSP monuments located within the Wyandotte Creek Subbasin. The subsidence monitoring network also includes three extensometers in Butte County with a period of record beginning in 2005 (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 levels, indicating that inelastic land subsidence has not been an observed in the Wyandotte Creek Subbasin. This is likely due to relatively stable groundwater levels historically and subsurface materials that are not 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

As Groundwater Levels SMC are used by proxy, the MO for land subsidence 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.

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 also 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 and mapping analysis of GDEs prepared by BCDWRC. The GDEs mapping analysis is presented in Section 2.2.7. 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.

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. These data are not available and are a data gap for the GSP. 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. 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:

- 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).
- 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.
- 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.
- 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.

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. For now, an 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.*

For this reason, 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 Chapter 6, an aggressive schedule has been provided to fill these data gaps and the GSA is committed to addressing these issues and develop appropriate SMC for Wyandotte Creek Subbasin.

3.8.4 Minimum Thresholds

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

> *Two RMS wells within a management area reach their MT for two consecutive non-dry year-types.*

This interim MT may be refined as more data are collected to support the SMC framework described above. In the meantime, this MT is protective of interconnected surface water in so far as it is protective of shallow domestic wells, which are more likely to be completed in shallow aquifer zones that have a greater connection to surface water.

3.8.5 Measurable Objectives

As Groundwater Levels SMC are used by proxy, the MO for interconnected surface water 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.*

As described previously, the historical record of groundwater levels shows fluctuations over a four- to seven-year cycle consistent with variations in water year type according to the Sacramento Valley Water Year Hydrologic Classification. It is not known whether streamflow and associated aquatic habitat and GDEs that are connected to groundwater have also experienced a long-term decline. Long-term declines in Feather River streamflow may have been avoided by reservoir releases aimed at maintaining streamflow levels and meeting water supply demands. As described previously, the wet-dry cycles are climatically induced, and the GSA has no ability to change this cyclical behavior; there will always be short-term cyclical fluctuations in surface water availability. The MO are therefore intended to address the long-term trend of the "peaks and valleys" of the short-term cycles. A focus on long-term trends will be maintained as more data are collected to inform future MOs for the shallowest zone of the aquifer system.

3.9 Sustainable Management Criteria Summary Tables

Groundwater Levels SMC and Water Quality SMC for each RMS are shown in Table 3-1 and Table 3-2, respectively. The locations of these wells are shown in Figures 4-5 and 4-6, respectively.