

# Tehama County Groundwater Demand Management Working Group

## Overview Report Executive Summary & Timeline

August 2024 - November 2025

Report created by the Consensus Building Institute. Updated December 2025

### Introduction

The Groundwater Commission established a stakeholder advisory group, the Demand Management Working Group, pursuant to **Board Resolutions 4-2024 and 2-2024**, to help develop groundwater demand management programs. These programs are required as part of implementing the subbasins' Groundwater Sustainability Plans (GSPs) under the CA Sustainable Groundwater Management Act (SGMA). The Board Resolutions stated the demand management programs were to be established by January 1, 2026 (Red Bluff, Antelope, Los Molinos Subbasins) and January 1, 2027 (Corning Subbasin).

### Key Outcomes

The Working Group has held 14 meetings between August 2024 and November 2025. The Working Group helped develop key elements of the demand management program, while also surfacing important areas for ongoing discussion.

Some of the key accomplishments by the Working Group included:

- Agreement that the program **starts with a polygon-based approach (Thiessen methodology)** for spatial management that would be updated as new information becomes available
- Support for a **hybrid approach** that prioritized **incentivized voluntary demand management** before triggering required groundwater **usage restrictions**.
- Feedback on drafting the Demand Management **Program Development Framework** report
- Review and input on the demand management actions **straw proposal**.
- Call for near-term **re-evaluation of Measurable Objectives (MOs)** for existing representative monitoring site (RMS) wells and establishing **MOs and Minimum Thresholds (MTs) for new RMS wells**
- Creating **placeholders for water trading program** details to be developed post January 2026 and identifying **other topics for future discussion** (see next section).

[Meeting Materials are available online](#)

### Areas Requiring Further Discussion

The following are topics the Working Group identified as warranting further discussion (by the working group or other entities as appropriate):

- Reviewing the monitoring wells for demand management and confirming if demand management-specific MOs and MTs are warranted
- Addressing key data gaps and information needs (e.g., improved monitoring network, updated integrated hydrogeologic model, hydrogeologic connection to polygon boundaries)
- Trigger mechanisms: Rationale for activation thresholds
- Economic impact analysis and funding mechanisms
- Timeline concerns: constricted deliberations with 2026 deadline, when DM restrictions take effect (2031), ability of recharge projects to show results

- Flexibility mechanisms: appeals process, allocation trading, lease provisions, non-contiguous parcel management

## Governance Structure and Roles

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- District Board of Directors: Final decision-making authority
- Groundwater Commission: Advisory to District Board
  - Ad Hoc Committee (Crain, Ward, Hamer): Report and advisory to Commission; met occasionally to help distill information and frame presentations/discussions as needed
  - Working Group (Ad Hoc members plus Borrer, Flynn, Myhre, Gruenwald, Turnbull): Advisory to Ad Hoc/Commission; consensus-seeking advisory body
    - Gruenwald and Turnbull also members of the Corning Subbasin Advisory Board (CSAB)
- District Staff: Administrative support, options analysis, possible recommendations
- Consultants (analyses/information-gathering, not policy recommendations)
  - Technical Consultants (LSCE, Davids, ERA): Technical information only
  - Facilitation Consultant (CBI): Meeting facilitation, materials development support
  - Legal Consultant (BKS): Legal defensibility opinions

## Key Milestones Timeline

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### Phase 1: Formation & Information Gathering (Aug-Dec 2024)

Meeting 1 (Aug 26): Kickoff

- Background, problem definition, success criteria. Information requests identified.

Meeting 2 (Sep 25): Sustainable Yield Focus

- Draft program outline presented. Data/information needs identified (e.g., evapotranspiration [ET], irrigation methods, 10-year monitoring well data, etc.).

Meeting 3 (Oct 23): Polygon Approach Concept Adopted

- DECISIONS: WG recommended Thiessen polygon approach with RMS wells + wells with sufficient data as 'good enough starting point.' Agreement established with understanding of 5-year review cycles.

Meetings 4-5 (Dec 2, Dec 18): Polygon Refinement

- Continued polygon revision. Safe yield calculations per polygon. Data validation needs identified.

### Phase 2: Program Development (Jan-Jun 2025)

Meetings 6-7 (Jan 22, Feb 18): Program Framework Development

- Technical consultants (LSCE, Davids Engineering, ERA Economics) engaged to develop framework outline for developing a demand management program. Economic analysis needs considerations began.

Meeting 8 (Apr 2): Dual Track Approach

- DECISIONS: Proceed on parallel tracks: 1) General technical framework document, and 2) Specific straw proposal. Guiding principles developed emphasizing incentives first, with recognition that allocations may be necessary.

Meetings 9-10 (Jun 4, Jun 25): Straw Proposal Elements

- Fee-based trigger mechanisms developed. Draft DM Program Development Framework Document previewed. Hydrograph data packages requested for specific polygon groupings.

### Phase 3: Review, Refinement, Packaging, and Looking Forward (Jul-Nov 2025)

Meeting 11 (Jul 16): Deep Technical Discussion

- Further discussion on polygon boundaries and hydrogeologic reality. Detailed discussion of grouping approaches.

#### Meeting 12 (Aug 6): Refinement & Legal Review Initiated

- Final DM Program Development Framework document shared. Legal review (BKS) initiated. Multiple WG members submitted detailed written feedback raising concerns about timeline, polygon representativeness, and data needs.

#### Meeting 13 (Aug 27): Key Commitments

- DECISIONS: Confirmation to use polygon concept for management as starting point. Priority to develop MOs/MTs for new monitoring wells immediately (don't wait until 2031). Water trading program placeholder created. "Backstop" fee modified to have a maximum cap: up to \$500 AFY
- Mid-process DM WG discussion issues summary document created

#### NOTE: Interim Activities (September-November)

- September: Straw Proposal presented to Groundwater Commission and Board of Directors; approved proposal for legal review
- October-November: consultant BKS legal review, LSCE technical memo

#### Meeting 14 (Nov 20): Legal Review & Technical Memo

- BKS legal review indicated no major legal concerns with the straw proposal. LSCE Technical Memo presented information related to the demand management program proposal development consolidated into a single document. Clarification that DM-specific MOs/MTs can differ from GSPs' MOs/MTs. Next meeting: January 7-8, 2026.

## Conclusion and Looking Forward

This process has demonstrated both the challenges and the value of stakeholder engagement in complex groundwater management. The Demand Management Working Group has provided essential perspectives that have shaped the program's development, even where full consensus was not achieved.

The proposed Demand Management Program framework includes substantial flexibility and adaptive management provisions, acknowledging that perfect information is not available and that adjustments will be necessary over time.