Tehama County

Agenda Request Form

File #: 25-2147 **Agenda Date:** 12/15/2025 **Agenda #:** 6.

Demand Management Program

Requested Action(s)
Recommendations on final Demand Management Program for the Board of Directors.

Financial Impact:
Unknown, however program costs are intended to be covered by groundwater user fees.

Background Information:
As part of our DWR approved groundwater sustainability plans the district has agreed to create a demand management program prior to January 1, 2026. The attached is he outcome from the Demand Management Working Group discussions. Also attached is legal review, technical information and input from Tehama County Farm Bureau. The Groundwater Commission was unable to pass a recommendation and has requested until April of 2026 to review further prior to recommendation.

Definitions

Calculated Sustainable Yield: The average Safe Yield of the Polygons in a Combined Safe Yield Area (calculated as acre-feet (af)) divided by the total irrigated acres within a Combined Safe Yield Area (af/acre). This represents, over the long term, the average quantity of water that can be withdrawn annually without causing undesirable results under the Sustainable Groundwater Management Act (SGMA). For the purpose of groundwater Demand Management, Calculated Sustainable Yield will be updated at least every 5 years.

Combined Safe Yield Area: The grouping of polygons in relation to their estimated quantity of Safe Yield that can be extracted. In each managed subbasin, polygons within the same range (af) of Safe Yield will be grouped together for the purpose of Demand Management. The ranges are: -5000 af or less, -5,000 af to -1,000 af, -1,000 af to -500 af, -500 af to 500 af, 500 af to 1,000 af, 1,000 af to 5,000 af, 5,000 af to 50,000 af, 50,000 af to 100,000 af, 100,000 af to 500,000 af and greater than 500,000 af.

Demand Management: GSA actions, rules or programs that are intended to avoid Minimum Thresholds, prevent undesirable results under SGMA, and incentivize long-term sustainability by reducing the pumping of groundwater.

GSA: Groundwater Sustainability Agency. Tehama County Flood Control and Water Conservation District is the GSA for the subbasins in Tehama County.

GSP: Groundwater Sustainability Plan. Each managed subbasin in Tehama County has an associated GSP.

Management Action: A specific action taken by the GSA to reduce the use of groundwater.

Measurable Objective: (MO) As defined in each subbasin GSP in compliance with SGMA.

Minimum Threshold: (MT) As defined in each subbasin GSP in compliance with SGMA.

Polygon: Flat, two-dimensional shape bounded by straight lines. For the purpose of groundwater Demand Management, Polygons are the specific areas by which the resource is managed and which are created using the Thiessen method surrounding (a single point) RMP/RMS.

RMP/RMS: Used interchangeably within the various GSPs, Representative Monitoring Points or Representative Monitoring Sites are facilities the location of which are monitored for groundwater level at least twice per year (spring and fall). RMP/RMS are the single point used in the creation of Polygons utilizing the Thiessen method. Prior to December 30, 2030, and reviewed in five-year intervals thereafter, the Tehama County Flood Control and Water Conservation District Board of Directors, based on recommendations from the Groundwater Commission and District staff, will ratify by resolution a network of RMP/RMS, with appropriate MOs and MTs, for the purpose of groundwater Demand Management. An RMS/RMP should contain 10 years of somewhat consistent monitoring.

Safe Yield: The estimated quantity of groundwater (in af) that can be extracted in a polygon without causing an unreasonable lowering of groundwater levels or other undesirable results under SGMA. Safe Yield is calculated as average pumping +/- average change in storage. For the purpose of groundwater Demand Management, averages are calculated on a 10-year rolling basis, ending with the previous water year data.

Target Assumed Maximum Pump Rate: Each groundwater use type (e.g. agricultural based on crop variety, commercial, residential, etc.) will be assigned, as part of the GSA fee structure and prior to December 30, 2030, an assumed pump rate (af/acre). The use type assigned with the highest assumed

pump rate will be the Target Assumed Maximum Pump Rate. Any assumed pump rate can be replaced with actual reported volume via meter.

Trigger: A set point for each Sustainability Indicator, as that term is defined in the SGMA regulations (23 CCR § 351 (ah)), at which a Management Action is initiated.

Fees and Actions Associated With Trigger-Based Demand Management

In the interest of achieving sustainable groundwater extraction within all Subbasins partially or entirely within Tehama County, the Flood Control and Water Conservation District (District), acting as the GSA, is proposing a secondary level of Demand Management consisting of two Management Actions. The District will adopt these Management Actions immediately but intends to delay implementation until January 1, 2031 unless conditions change such that earlier implementation in a Subbasin must be considered. This delayed implementation will allow the primary method of Demand Management, incentive-based demand reduction, to be initiated and tested for effectiveness.

Management Action Number 1 is intended to reasonably and equitably distribute the costs of more intensive administrative actions by the District associated with persistent groundwater overdraft in defined areas within any of the Subbasins pursuant to Propositions 26 and 218. Examples of these costs are: automated monitoring systems for RMP/RMS sites; increased efficiency and voluntary reduction measures; study, design and implementation of other project and Management Actions and public education on next steps. It is assumed that an increase in the cost to manage groundwater along with additional actions by the District will result in less total extraction.

Management Action Number 2 is adoption of an ordinance restricting groundwater extraction that exceeds the Calculated Sustainable Yield. By recalculating the sustainable yield on a five-year basis it creates flexibility and allows for the application of new data as it is collected.

The ordinances for both Management Actions will include an administrative appeals process.

This program does not address water trading, except as between contiguous parcels as would be allowed in current Tehama County water use ordinances. A separate water trading ordinance will be adopted by the District Board of Directors prior to December 30, 2030.

Management Action Number 1: Reduce Use of Groundwater When Groundwater Levels Decline Below Measurable Objectives. The following Management Action will reduce the likelihood of undesirable results related to the chronic lowering of groundwater levels, reduction in groundwater storage, and land subsidence through increased administrative action by the GSA. This Management Action will take place in a series of steps according to how far groundwater levels deviate from the Measurable Objective.

Step 1: If greater than 20% of the annual range (which is calculated as the difference between the spring maximum measurement and the fall minimum measurement) of groundwater elevation declines below the Measurable Objective levels established at 50% or more of the RMPs for two consecutive years in a Combined Safe Yield Area, then the Target Assumed Maximum Pump Rate (acre-fee per acre) will be reduced by ten percent (10%). All measured or assumed pumping greater than the target assumed maximum yield will incur an increased groundwater extraction fee as detailed in the Tehama County Flood Control and Water Conservation District groundwater management fee structure.

Step 2: If greater than 40% of the annual range (spring maximum measurement to fall minimum measurement) of groundwater elevation declines below the Measurable Objective levels established at 50% or more of the RMPs for two consecutive years in a Combined Safe Yield Area, then the Target Assumed Maximum Pump Rate (acre-feet per acre) will be reduced by 20 percent (20%). All measured or

assumed pumping greater than the target assumed maximum yield will incur an increased groundwater extraction fee as detailed in the Tehama County Flood Control and Water Conservation District groundwater management fee structure.

Step 3: If greater than 80% of the annual range (spring maximum measurement to fall minimum measurement) of groundwater elevation declines below the Measurable Objective levels established at 50% or more of the RMPs for two consecutive years in a Combined Safe Yield Area, then the Target Assumed Maximum Pump Rate (acre-feet per acre) will be reduced by forty percent (40%). All measured or assumed pumping greater than the target assumed maximum yield will incur an increased groundwater extraction fee as detailed in the Tehama County Flood Control and Water Conservation District groundwater management fee structure.

Step 4: If greater than 100% of the annual range (spring maximum measurement to fall minimum measurement) of groundwater elevation declines below the Measurable Objective levels established at 50% or more of the RMPs for two consecutive years in a Combined Safe Yield Area, then the Target Assumed Maximum Pump Rate (acre-feet per acre) will be reduced by eighty percent (80%). All measured or assumed pumping greater than the target assumed maximum yield will incur an increased groundwater extraction fee as detailed in the Tehama County Flood Control and Water Conservation District groundwater management fee structure.

Mitigating activity under this Management Action is expected to decrease as groundwater levels increase. If groundwater levels recover to a higher step for two consecutive years, then the Target Assumed Maximum Pump Rate will be adjusted to that step. If groundwater levels rise above the Measurable Objective for two consecutive years, then the Target Assumed Maximum Pump rate will be removed entirely.

After adoption of this Demand Management Plan, the District's Board of Directors will, within 180 calendar days, adopt an implementing ordinance creating the steps outlined above and initiating the process to place fees required due to falling groundwater levels with a start date of January 1, 2031.

Management Action Number 2: Sustainable Yield Pumping. This action will occur in conjunction with Management Action Number 1 and is intended to prevent groundwater extraction above Calculated Sustainable Yield from causing undesirable results (as defined in the GSP) including sustained water levels below the Measurable Threshold.

If, over any two-year period, the groundwater at any RMP falls below the Measurable Threshold of that RMP; the entire Combined Safe Yield Area containing that RMP will be restricted to the average Safe Yield of all Polygons within the Combined Safe Yield Area. Independently of this Measurable Threshold Trigger , if undesirable results occur at any time within any Combined Safe Yield aArea, the entire Combined Safe Yield Area will be restricted to the average Safe Yield of all Polygons within the Combined Safe Yield Area.

The average Safe Yield of the Combined Safe Yield Area will be the Calculated Sustainable Yield for the entire Combined Safe Yield Area and will be calculated as follows:

1. Each Thiessen Polygon within a Combined Safe Yield Area will be assigned a Calculated Total Safe Yield (acre-feet).

2. The Calculated Total Safe Yield will be divided by the total irrigated acres within the Polygon.

3. The resulting acre-feet per acre will be the Safe Yield for that Polygon.

4. The Safe Yield for each Polygon within a Combined Safe Yield Area will be added together and divided by the total number of Polygons within the Combined Safe Yield Area.

5. The resulting number (acre-feet per acre) will be the Calculated Sustainable Yield for the entire Combined Safe Yield Area.

6. The sustainable yield will be recalculated every five years starting January 1, 2031 to account for changes in land use and projects within the Combined Safe Yield Area.

Under Sustainable yield pumping, all groundwater extractors will be limited to the Calculated Sustainable Yield, total acre-feet peracre for all acreage within contiguous Assessor Parcel Numbers, under one ownership, and serviced by one or more extraction facilities. Total extraction may be either reported or assumed. Contiguous Assessor Parcel Numbers, under one ownership, that fall within multiple Combined Safe Yield areas will fall under the most restrictive Combined Safe Yield aArea.

If Sustainable Yield Pumping is triggered, it will remain in effect until the following three conditions are met:

> Condition 1, no existing undesirable results (as defined in the GSP) within the Combined Safe Yield Area.
>
> Condition 2, a minimum of two years with groundwater levels in all RMPs within the Combined Safe Yield Area remaining above the Measurable Threshold.
>
> Condition 3, conditions for Step 1 of Management Action Number one are **not** met.

Upon adoption of this Demand Management Plan, the District Board of Directors will, within 180 calendar days, adopt an ordinance creating a fine of up to$500 per acre for all groundwater (either assumed or measured) that is extracted beyond the sustainable yield for all extractors within any Combined Safe Yield Area under sustainable yield pumping restriction.

If 20% of the annual range of groundwater elevation (GWE) declines below the measurable objective (MO) at 50% or more of the RMPs for two consecutive years

(in other words, if the groundwater elevation *declines*
to or below 9.2 feet in 2023
to or below 8.2 feet in 2024
to or below 9 feet in 2025)

Then the target assumed max pump rate will be reduced by 10%.

In this scenario, the target assumed max pump rate would have to be reduced by 10%, as greater than 20% of the annual range of GWE has declined below the measurable objective for the years 2023 and 2024.

Time	GW Elevation (ft)
4/1/2023	12
10/1/2023	8
4/1/2024	15
10/1/2024	6
4/1/2025	15
10/1/2025	10

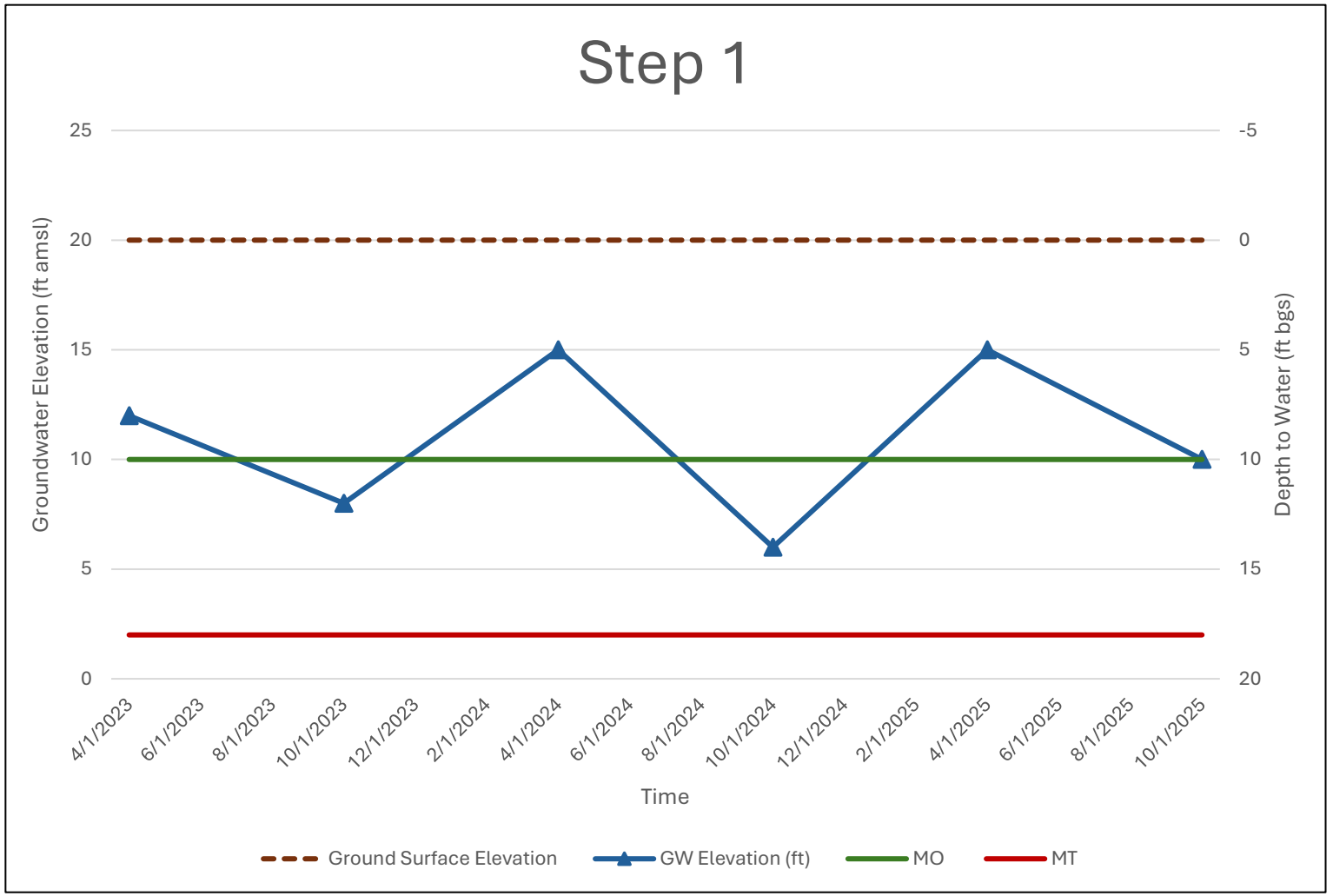
Annual Range = Spring - Fall

Year	20% of annual range (ft amsl)		
2023	0.8	MO - 0.8ft = 9.2ft	MO = 10
2024	1.8	MO - 1.8ft = 8.2ft	
2025	1	MO - 1ft = 9ft	

2023: the groundwater elevation shows a decline of 2 feet below the measurable objective to 8 feet (20% below the MO would be a 0.8 feet decline to 9.2 feet)

2024: the groundwater elevation shows a decline of 4 feet below the measurable objective to 6 feet (20% below the MO would be 1.8 feet)

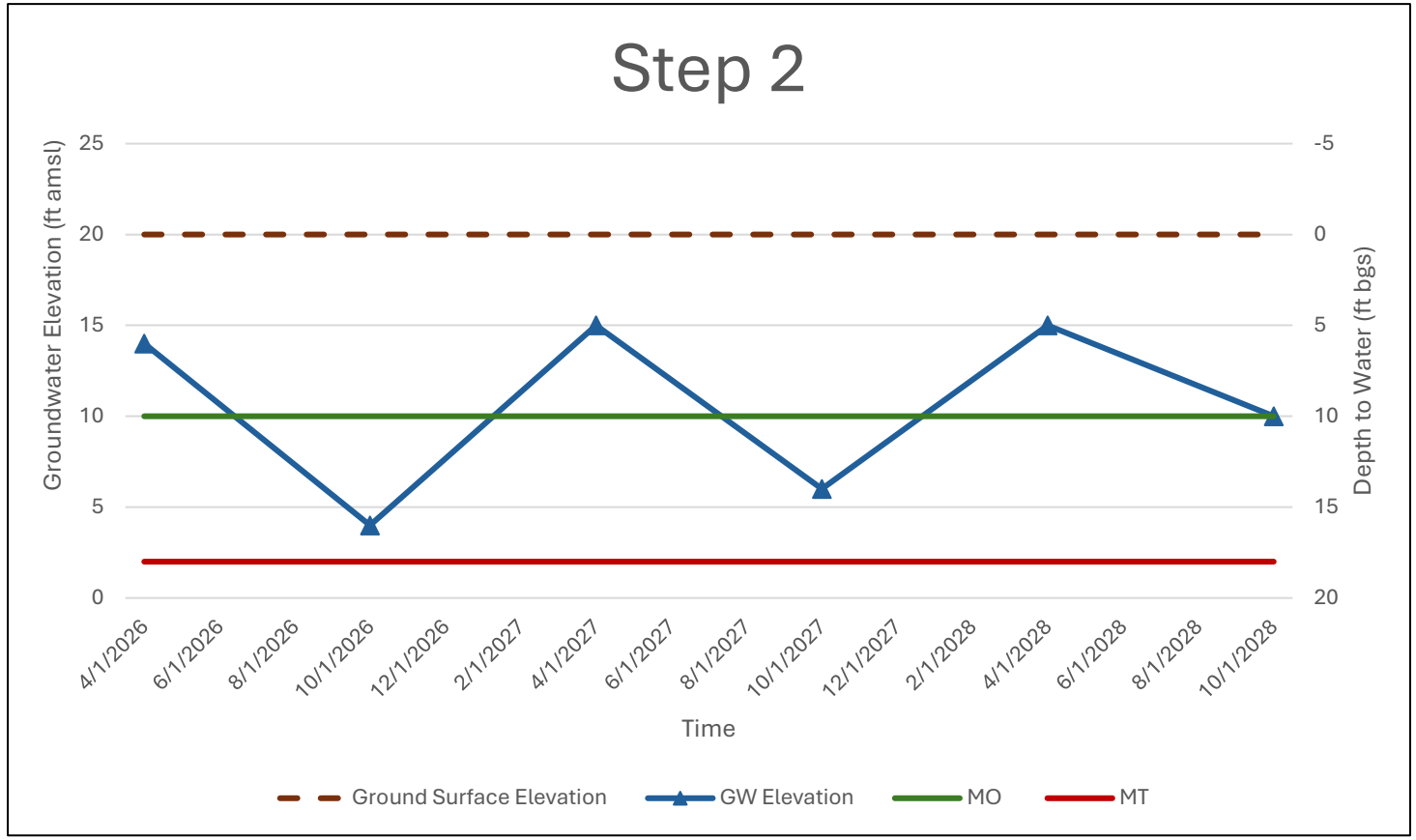
The assumed maximum pump rate would be reduced if this were part of a larger issue affecting more than 50% of the RMP network, as this marks two consecutive years.



Time	GW Elevation (ft)
4/1/2023	12
10/1/2023	8
4/1/2024	15
10/1/2024	6
4/1/2025	15
10/1/2025	10

Annual Range = Spring - Fall

Year	20% of annual range (ft amsl)		
2023	0.8	MO - 0.8ft = 9.2ft	MO = 10
2024	1.8	MO - 1.8ft = 8.2ft	
2025	1	MO - 1ft = 9ft	



Time	GW Elevation (ft)
4/1/2026	14
10/1/2026	4
4/1/2027	15
10/1/2027	6
4/1/2028	15
10/1/2028	10

Annual Range = Spring - Fall

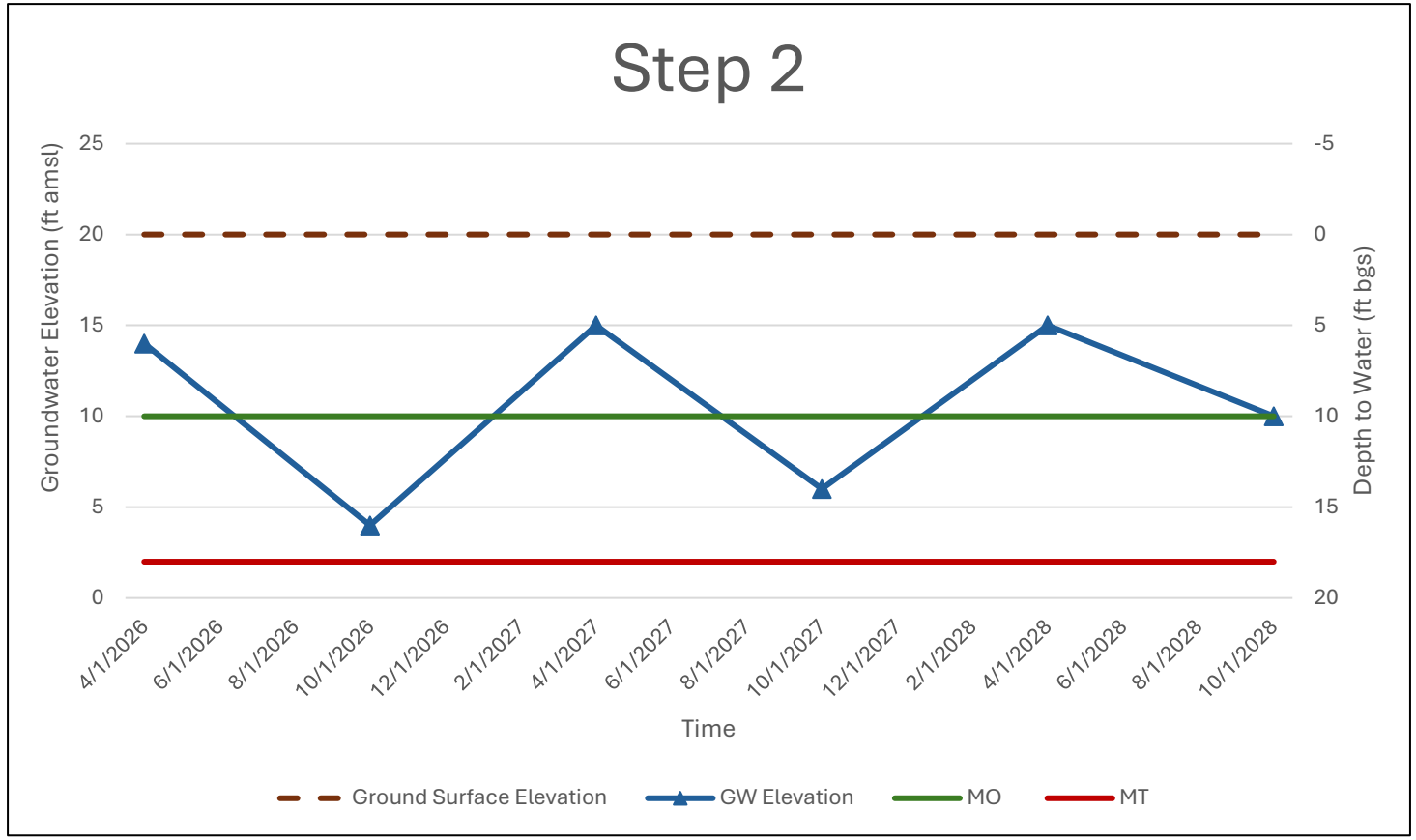
Year	40% of annual range (ft amsl)		
2026	4	MO - 4ft = 6ft	MO = 10
2027	3.6	MO - 3.6ft = 6.4ft	
2028	2	MO - 2ft = 8ft	

If 40% of the annual range of groundwater elevation declines below the measurable objective at 50% or more of the RMPs for two consecutive years

(in other words, if the GWE declines to/below 6 feet in 2026 to/below 6.4 feet in 2027 or to/below 8 feet in 2028)

Then the target assumed max pump rate will be reduced by 20%.

In this scenario, the target assumed max pump rate would have to be reduced by 20%, as greater than 40% of the annual range of groundwater elevation has declined below the measurable objective for years 2026 and 2027 after Step 1 was already implemented in previous years.



Time	GW Elevation (ft)
4/1/2026	14
10/1/2026	4
4/1/2027	15
10/1/2027	6
4/1/2028	15
10/1/2028	10

Annual Range = Spring - Fall

Year	40% of annual range (ft amsl)		
2026	4	MO - 4ft = 6ft	MO = 10
2027	3.6	MO - 3.6ft = 6.4ft	
2028	2	MO - 2ft = 8ft	

2026: the groundwater elevation shows a decline of 6 feet below the measurable objective to 4 feet (40% below the MO would be a 4 feet decline to 6 feet)

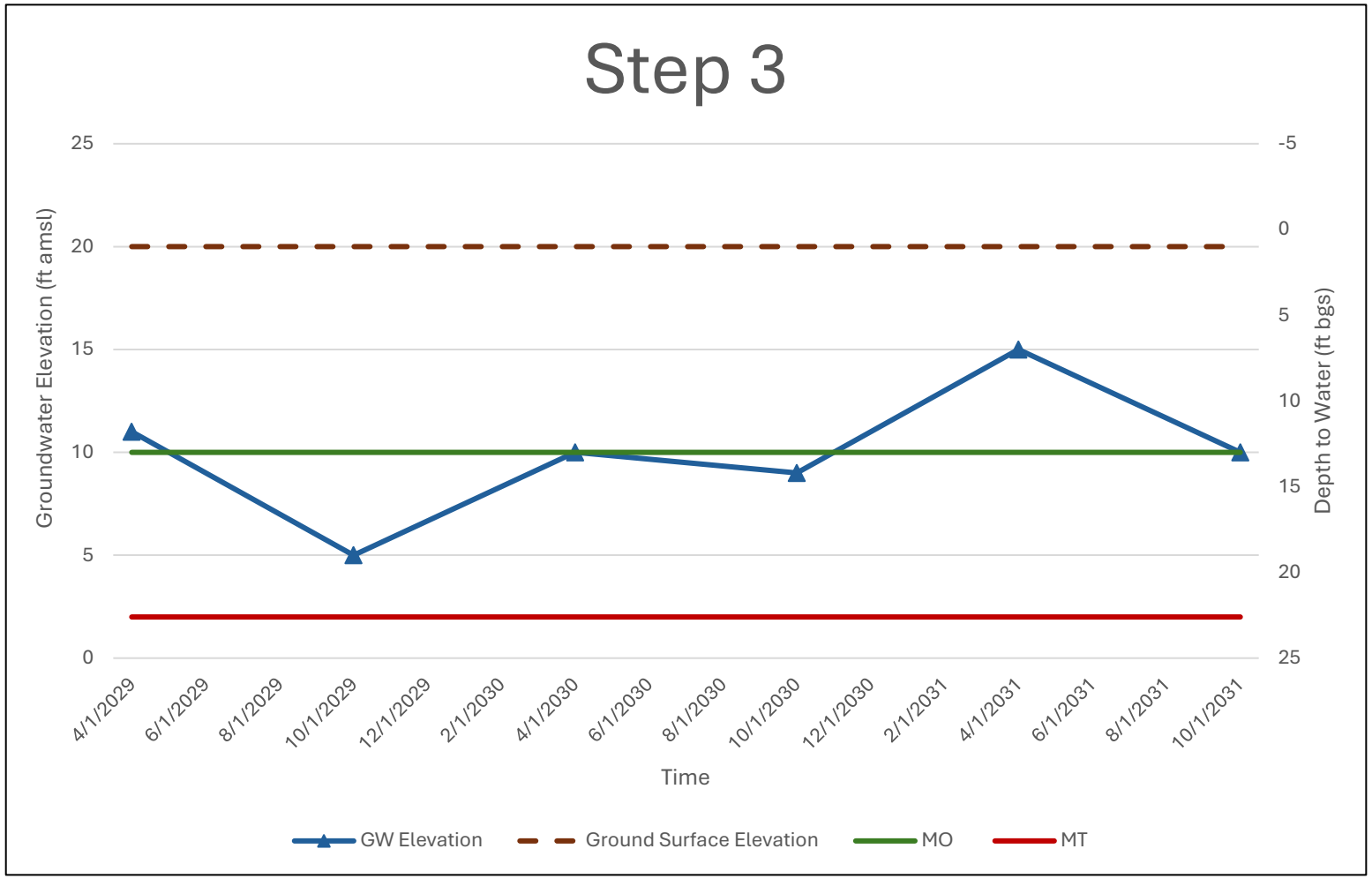
2027: the groundwater elevation shows a decline of 4 feet below the measurable objective to 6 feet (40% below the MO would be a 3.6 feet decline to 6.4 feet); therefore, *the assumed max pump rate must be reduced.*

If 80% of the annual range of groundwater elevation declines below the measurable objective at 50% or more of the RMPs for two consecutive years,

(in other words, if the groundwater elevation declines
to/below 5.2 feet in 2029
to/below 9.2 feet in 2030
to/below 6 feet in 2031)

Then the target assumed max pump rate will be reduced by 40%.

In this scenario, the target assumed maximum pump rate would have to be reduced by 40%, as more than 80% of the annual range of groundwater elevation has declined below the measurable objective for years 2029 and 2030, following the implementation of Step 2 in previous years.



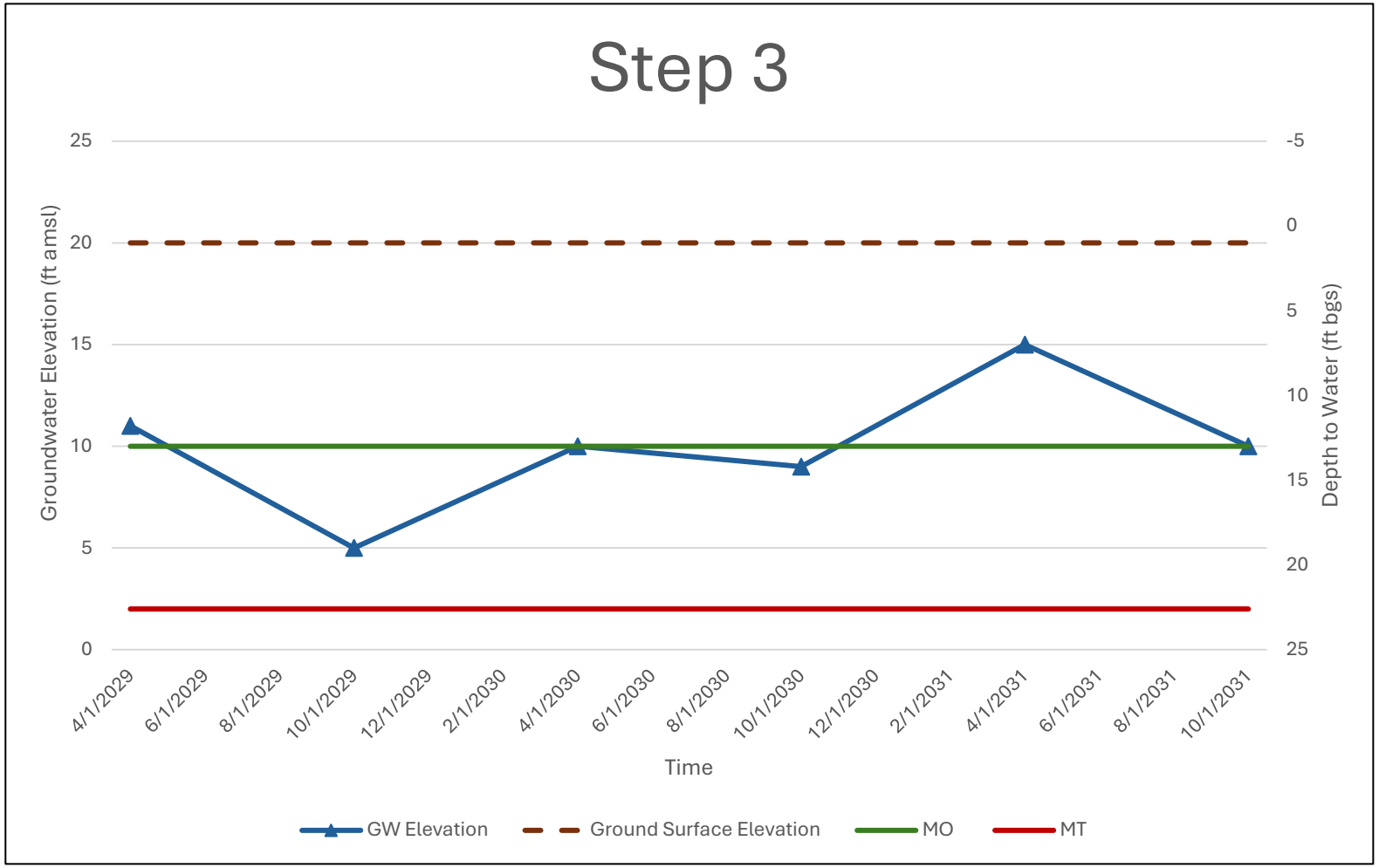
Time	GW Elevation (ft)
4/1/2029	11
10/1/2029	5
4/1/2030	10
10/1/2030	9
4/1/2031	15
10/1/2031	10

Annual Range = Spring - Fall

Year	80% of annual range (ft amsl)			
2029	4.8	MO - 4.8ft = 5.2ft		MO = 10ft
2030	0.8	MO - 0.8ft = 9.2ft		
2031	4	MO - 4ft = 6ft		

2029: the groundwater elevation shows a decline of 5 feet below the measurable objective to 5 feet (80% below the MO would be a 4.8 feet decline to 5.2 feet)

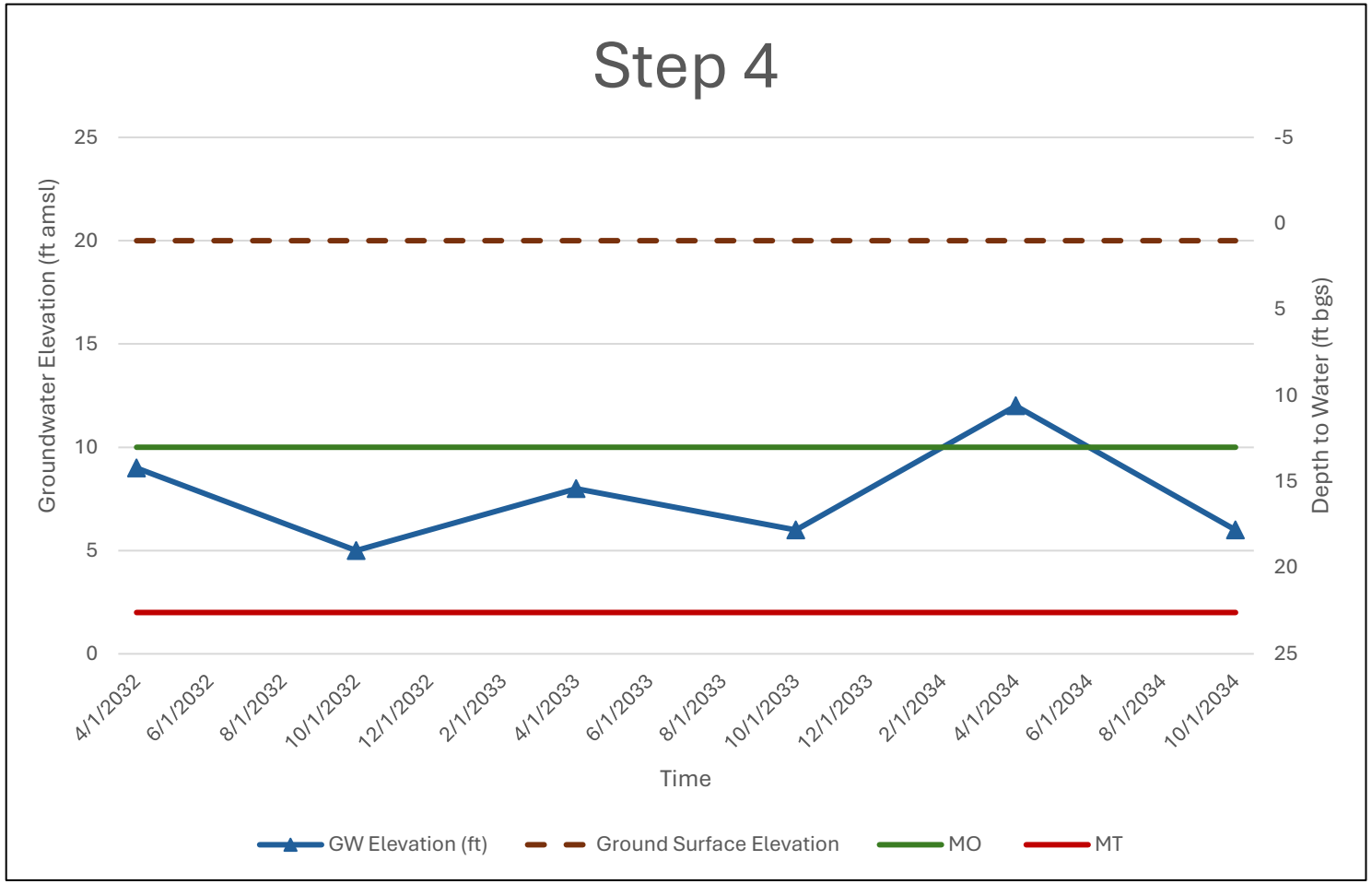
2030: the groundwater elevation shows a decline of 1 foot below the measurable objective to 9 feet (80% below the MO would be 0.8 feet decline to 9.2 feet); therefore, *the assumed max pump rate must be reduced*.



Time	GW Elevation (ft)
4/1/2029	11
10/1/2029	5
4/1/2030	10
10/1/2030	9
4/1/2031	15
10/1/2031	10

Annual Range = Spring - Fall

Year	80% of annual range (ft amsl)			
2029	4.8	MO - 4.8ft = 5.2ft		MO = 10ft
2030	0.8	MO - 0.8ft = 9.2ft		
2031	4	MO - 4ft = 6ft		



Time	GW Elevation (ft)
4/1/2032	9
10/1/2032	5
4/1/2033	8
10/1/2033	6
4/1/2034	12
10/1/2034	6

Annual Range = Spring - Fall

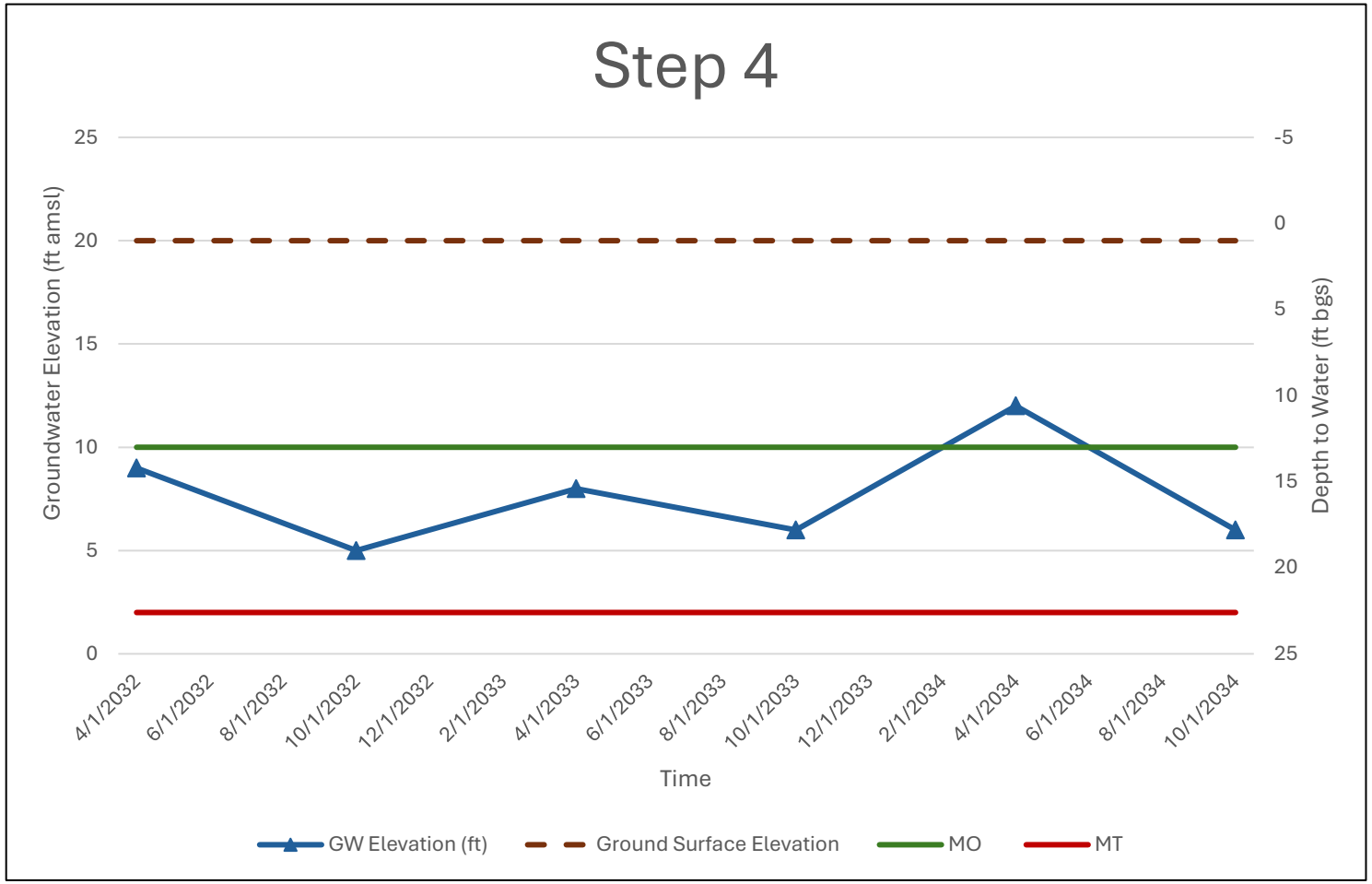
Year	100% of annual range (ft amsl)		
2032	4	MO - 4ft = 6ft	MO = 10ft
2033	2	MO - 2ft = 8ft	
2034	6	MO - 6ft = 4ft	

If 100% of the annual range of groundwater elevation declines below the measurable objective at 50% or more of the RMPs for two consecutive years

(in other words, if the both Spring and Fall measurements decline below the measurable objective)

Then the target assumed max pump rate will be reduced by 80%.

In this scenario, the target assumed max pump rate would have to be reduced by 80%, as 100% of the annual range of groundwater elevation has declined below the measurable objective for years 2032 and 2033 after Step 3 was already implemented in previous years.



Time	GW Elevation (ft)
4/1/2032	9
10/1/2032	5
4/1/2033	8
10/1/2033	6
4/1/2034	12
10/1/2034	6

Annual Range = Spring - Fall

Year	100% of annual range (ft amsl)		
2032	4	MO - 4ft = 6ft	MO = 10ft
2033	2	MO - 2ft = 8ft	
2034	6	MO - 6ft = 4ft	

2032: the groundwater elevation shows a decline of 1 feet below the measurable objective to 9 feet in the Spring and 5 feet below the MO to 5 feet in the Fall.

2033: The groundwater elevation shows a decline of 2ft below the measurable objective to 8ft in the Spring and a decline of 4ft below the measurable objective to 6ft – both annual ranges are 100% below the measurable objective ; therefore, *the assumed max pump rate must be reduced*.

TEHAMA COUNTY FARM BUREAU

December 3, 2025

Tehama County Groundwater Commission
Mr. Todd Hamer, Chairman
ToddHamer@sbcglobal.net

Dear Mr. Hamer,

The Tehama County Farm Bureau is concerned that the DWR requirement for extensive public input in developing the Ground Water Management Plan has not been met. In response, TCFB drafted a comprehensive and practical proposal for a Tehama County Groundwater Demand Management Plan (GDMP) designed to achieve long-term sustainability under California's SGMA (Sustainable Groundwater Management Act). This plan has been legally reviewed to address and comply with Tehama County Resolution 4-2024 as well as to meet DWR requirements for a Demand Management Plan as required by SGMA.

The attached plan was drafted in an effort to incorporate many of the excellent concepts developed by our local staff and ad-hoc efforts, while also taking into consideration proven methodologies implemented in other sub-basins. We believe there is firm support for the timely implementation of a demand management plan, and that this can be best achieved by not "reinventing the wheel." By leaning on precedent established in other GSA's we believe the attached plan significantly reduces Tehama County's risk of legal exposure.

Our plan is respectively submitted to allow immediate adoption by the Flood Control Board of Directors in order to move forward in a timely manner as required by Tehama County Resolution 4-2024.

TCFB requests that you agendize this **TCFB Tehama County Groundwater Demand Management Plan (GDMP)** to be considered as an alternative to the plan that county staff will present at the Groundwater Commission Meeting on December 10, 2025.

Respectfully,

Janet Rabo

Janet Rabo
President, Tehama County Farm Bureau

Cc
Seth Lawrence, Lawrence.engr@gmail.com
Adam Englehardt, aenglehardt@outlook.com
Justin Jensen, jjenson@tcpw.ca.gov
Len Sequeria, lsequeira@tcpw.ca.gov

Bus: (530) 527-7882
Fax: (530) 527-6028

275 Sale Lane
Red Bluff, California 96080

TEHAMA COUNTY GROUNDWATER DEMAND MANAGEMENT PROGRAM

Framework for the Antelope, Red Bluff, and Los Molinos Subbasins

1. Program Basis and Authority

1.1 Resolution No. 4-2024

This Groundwater Demand Management Program (Program) is established pursuant to Resolution No. 4-2024 (Resolution), in which the District Board committed the District, as GSA, to "review, consider, and undertake mitigation actions for demand management" to address overdraft and groundwater level declines in the Antelope, Red Bluff, and Los Molinos Subbasins.

The Resolution recognizes the need for projects and management actions to achieve and maintain sustainable groundwater conditions by or before 2042 and acknowledges that hydrologic variability and project timing may increase the need for demand management.

1.2 Purpose and Objectives

Consistent with the Resolution, this Program is being developed to define the purpose, objectives, scope, roles and responsibilities, requirements, and potential outcomes for groundwater demand management in the three Subbasins. The anticipated goal of the Program is to address and mitigate overdraft and groundwater level decline, and related undesirable results, by reducing demand for groundwater during the GSP implementation period.

1.3 Required Two-Phase Structure

The Resolution specifies that the Program will consist of two categories of measures:

- **Phase I: Immediate Implementation Measures (Voluntary).**
  Measures to be "moved forward for immediate implementation (at the Program start date)," limited to voluntary actions such as best management practices, conservation, increased surface-water use in lieu of groundwater, multi-benefit land repurposing, dry farming, and non-substitution fallowing.
- **Phase II: Phased Adaptive Implementation Measures (Mandatory).**
  Measures to be "moved forward for phased adaptive implementation," developed so that they are "ready to implement in phases, commensurate with issues." These include allocations, well restrictions, pumping restrictions, and water market/trading and/or fee structures.

1.4 "Commensurate with Issues" Standard

The Resolution requires that phased adaptive measures be implemented commensurate with (a) the amount of demand reduction required, and (b) the specific issues facing the relevant area(s), considering regional "Special Zones," subbasin-wide, and management-area-wide applications as appropriate.

2. Stakeholder Communication and Engagement

(Precondition to Phase I and Phase II Implementation)

2.1 Legal and Policy Basis

Under SGMA, GSAs must consider the interests of all beneficial users and "encourage the active involvement of diverse social, cultural, and economic elements of the population within the groundwater basin prior to and during the development and implementation of the groundwater sustainability plan." (Wat. Code, § 10727.8; *see also* § 10723.2.) The Department of Water Resources's Guidance Document for Groundwater Sustainability Plan: Stakeholder Communication and Engagement and Best Management Practices framework emphasize early, continuous, and documented engagement as a core element of SGMA implementation. This direction and guidance makes clear that GSAs should:

- Identify all beneficial uses and users and maintain a list of interested parties.
- Encourage active involvement of diverse stakeholder groups throughout planning and implementation.
- Document outreach activities and how public input is incorporated into decisions.

2.2 Program Communication and Engagement Plan

Before the District advances to adoption of Phase I voluntary measures and Phase II regulatory measures (allocations, restrictions, fee structures), it will prepare and maintain a written Program Communication and Engagement Plan (C&E Plan) that is:

- Aligned with DWR's Stakeholder Communication and Engagement Guidance and related SGMA Best Management Practices materials;
- Basin-specific to the Antelope, Red Bluff, and Los Molinos Subbasins; and
- Integrated with, but distinct from, any broader GSP communication plans.

At a minimum, the Program C&E Plan will:

1. Identify stakeholder groups and beneficial users, including but not limited to: agricultural pumpers, domestic well owners, small water systems, municipalities,

disadvantaged communities, tribes (if any choose to participate), environmental interests, and industrial/commercial users.

2. Describe key messages and anticipated questions related to both Phase I and Phase II measures.
3. Set out engagement methods and tools, such as public workshops, focused small-group meetings, surveys, mailings, website content, and use of DWR's digital toolkit examples.
4. Include an engagement schedule and milestones tied specifically to Program decision points, including any Board actions on Phase I or Phase II ordinances or resolutions.
5. Describe how feedback will be documented and used, including preparation of a "Response to Comments / Engagement Summary" prior to Board adoption of Phase I and Phase II measures, respectively.

2.3 Outreach Milestones Prior to Phase I and Phase II Adoption

As a matter of Program policy, the District will not bring Phase I voluntary measures or Phase II allocations or other mandatory Program measures forward for Board adoption until the following outreach milestones have been completed and documented:

a. **Baseline Listening Sessions.** At least one listening session in each Subbasin (Antelope, Red Bluff, Los Molinos) focused on concerns and questions about potential allocations, restrictions, and fees.

b. **Stakeholder Workshops.** One or more technical but accessible workshops explaining the need for demand management, the "commensurate with issues" standard, and the conceptual structure of Phase I and/or Phase II tools (without locking in specific numbers or maps).

c. **Targeted Engagement.** Direct outreach to domestic well users and disadvantaged communities, and invitations to tribal governments and small systems, consistent with DWR guidance on inclusive engagement.

d. **Public Review of Draft Phase I and Phase II Framework.** A publicly noticed comment period (e.g., 45 days) on a Draft Phase I Framework and Draft Phase II Framework, respectively, describing how allocations and related tools would function, supported by plain-language summaries and graphics.

e. **Engagement Summary Report.** A written summary documenting outreach methods used, meetings held, comments received, and how substantive input was incorporated or addressed, to be presented to the Board alongside any proposed Phase I and/or Phase II ordinance or resolution.

2.4 Ongoing Engagement During Implementation

The Program C&E Plan will also address ongoing engagement during implementation of both phases, including:

- Regular updates at Board or committee meetings;
- Periodic fact sheets and website updates;
- Opportunities for growers, domestic users, and other stakeholders to review data and account information; and
- A standing process for submitting questions and requests for clarification.

2.5 Outreach Requirements

No Phase I or Phase II allocations, restrictions, or related regulatory ordinances will be adopted unless and until:

a. The Program C&E Plan described above has been adopted;

b. The outreach milestones herein described have been satisfied and documented; and

c. The Board finds, based on substantial evidence in the record, that stakeholder engagement has been reasonably conducted consistent with DWR's Stakeholder Communication and Engagement Guidance and SGMA's requirements to consider beneficial users.

3. Program Structure Overview

3.1 Two-Phase Program

- **Phase I: Voluntary Measures.**
  Implemented at Program start following Stakeholder Engagement and focused on voluntary, incentive-based demand reduction and land/water management practices.
- **Phase II: Phased, Adaptive Mandatory Measures.**
  Developed during the Program design period so they are "ready to implement in phases, commensurate with issues," but only advanced to adoption after the engagement milestones in Section 2 are completed and documented.

3.2 Conceptual Plan in Appendix A

To keep this Program framework policy-focused and responsive to the Resolution, a conceptual plan outlining future steps, including methods, metrics, and tools supporting Phases I and II is included in Appendix A.

4. Phase I Measures (Voluntary)

4.1 Possible Measure Categories (from Resolution)

Phase I measures may be drawn from the voluntary actions listed in the Resolution, including:

a. Best management practices for irrigation and crop management;

b. Water conservation focused on reducing consumptive use and groundwater extractions;

c. Increased use of available surface water in lieu of groundwater;

d. Multi-benefit land repurposing (e.g., recharge, habitat, renewable energy, recreation);

e. Incentivized land use changes that provide a net groundwater benefit;

f. Dry farming; and

g. Fallowing not associated with groundwater substitution transfers.

4.2 Program Design Elements

For each Phase I measure, the Program will define:

- Eligibility criteria and geographic applicability;
- Determination of management zones;
- Determination of sustainable yield for each management zone;
- Credit system;
- Enrollment process and any required documentation;
- Incentives or support (if applicable);
- Verification methods; and
- How demand-reduction benefits will be estimated and incorporated into GSP implementation.

Supporting concepts are provided in Appendix A.

5. Phase II Measures (Phased Adaptive / Mandatory Tools)

5.1 Measure Types (from Resolution)

Phase II measures will consist of mandatory tools such as:

- Groundwater use allocations;

- Well or pumping restrictions; and
- Water market/trading and/or demand-management fee structures.

5.2 Implementation Protocol (Required Items)

In accordance with the Resolution, the Program will address, for Phase II measures:

- Identification of areas where measures may be applied (e.g., subbasins, management areas, or special zones);
- Determination of sustainable yield for those areas;
- Determination of a transition period to sustainable conditions prior to 2042, considering uncertainty and project timelines; and
- Processes and timelines for implementing, evaluating, and adapting measures through annual reports and periodic GSP evaluations.

5.3 Allocation and Enforcement Concepts

The Program will develop an allocation and enforcement framework that:

- Applies the "commensurate with issues" standard (Section 1.4);
- Uses management areas or special zones where appropriate; and
- Addresses development and enforcement of allocations related to consumed versus extracted groundwater, as called for in the Resolution.

Supporting concepts are described in Appendix A.

5.4 Technical Support and Administrative Record

The District will support development and implementation of the allocation and enforcement framework with technical data, analyses, and memoranda prepared by the District's consultants and technical team, and will incorporate those materials into the Program's administrative record (e.g., the Ludhorf & Scalmanini Consulting Engineers (LSCE) Technical Memorandum dated November 19, 2025, titled *"Technical Foundations for Safe Yield, Sustainable Yield, and Groundwater Demand Management in Tehama County,"* and any subsequent updates or successor memoranda).

6. Monitoring, Reporting, and Adaptation

6.1 Monitoring and Enforcement

The Program will define monitoring and enforcement processes for both voluntary and mandatory measures, including:

- Data sources and monitoring tools;

- Compliance-tracking methods; and
- Consequences for non-compliance with Phase II allocations and rules. [cite: 236–237]

Supporting concepts are described in Appendix A.

6.2 Reporting and Adaptive Management

Program performance and conditions will be evaluated through:

- Annual reporting consistent with SGMA; and
- Periodic GSP evaluations, with Program-related findings and any recommended adjustments documented in the record.

7. Funding and Financing

7.1 Funding approach and Board authority

The District will fund the Program through long-term GSA funding mechanisms as determined by the District Board. Anticipated funding sources may include: (i) GSA fees and assessments; (ii) funds generated through implementation of other projects and management actions (e.g., fines and/or penalties); (iii) county/state/federal funding, as available; and (iv) other sources, as identified.

Program funding must be available beginning at Program implementation to fund both Phase I and Phase II activities.

7.2 Base Fee (Administrative and Monitoring Costs)

To fund core administrative and monitoring costs for the three Subbasins, the District Board will consider approval of a Base Fee to be implemented on the 2026/2027 property tax bills (tax roll), following the applicable Proposition 218 or Proposition 26 process. This Base Fee is intended to cover baseline Program functions and costs, including:

- Legal services;
- Technical services;
- Administrative services;
- Operating expenses; and
- SGMA compliance expenses (including annual and periodic reporting requirements).

The Base Fee is intended to fund, among other things: administrative program costs; data collection, modeling, and monitoring (including automated monitoring systems for monitoring sites); annual satellite-based consumptive use reporting; consultant support to

refine sustainable yield and related technical assumptions as additional data becomes available; and public outreach activities required by Section 2 of this Program.

The Base Fee will be informed by the District's supporting budget materials, including Appendix B (Tehama County Groundwater Sustainability Agency Budget Forecast) as presented to the Groundwater Commission on August 13, 2025, which does not include budgeting for future projects or management actions).

7.3 Base Fee allocation methodology

The Base Fee will be allocated across three user groups:

a. Parcels 5 acres or less: flat per-parcel fee;

b. Non-irrigated lands greater than 5 acres: fee per non-irrigated acre; and

c. Irrigated lands greater than 5 acres: fee per irrigated acre.

The District will define classification criteria (including how irrigated and non-irrigated acres are determined) through the implementing Board action(s) and supporting fee study.

7.4 Additional fees for demand management actions (Phase II and projects)

Separate and additional funding mechanisms will be required to support future phased demand management programs and actions (including, as applicable, projects, incentives, mitigation programs, allocations administration, and enforcement). Any such fees will be considered and implemented only through the applicable Proposition 26 and/or Proposition 218 process, depending on the fee structure and purpose.

8. Term and Timeline

8.1 Program Start Date

The Resolution directs that the Program be developed and that implementation begin no later than January 1, 2026.

8.2 Program Duration

Upon implementation, the Program is intended to continue in perpetuity unless otherwise directed by the District.

8.2 Program Timeline

See Section 9 of Appendix A.

9. Governance, Approval, and Environmental Review

9.1 Program Governance

The Resolution contemplates the formation of a committee to develop and set the final terms of the Program. Final implementation and management of the Program, including Phase I and Phase II components, will be approved by the District Board prior to the Program start date.

9.2 Environmental Review

The District will conduct any environmental review determined necessary for Program implementation and will integrate such review with adoption of Phase I and/or Phase II regulatory measures where appropriate.

APPENDIX A

(To Be Adopted by Resolution and Amended as Needed)

1. Executive Summary

- Purpose and legal authority (SGMA, Tehama County ordinances)
- Plan goals: Achieve sustainable yield by 2042, protect critical domestic wells, maintain agricultural viability
- Key mechanisms - Establish:
    - Management Zones
    - Calculation of Safe Yield
    - Use of Measurable Objectives and Minimum Thresholds
    - Base Fee Structure for GSA Administrative Purposes – Baseline Fee for Users at or below Safe Yield
    - Fee Structure for Users above Safe Yield – Fees dedicated for projects to achieve sustainability goals
    - Allocation of transferable pumping credits + tiered fee structure
    - Other as determined to be necessary

2. Plan Area and Management Zones

- Subbasins (Antelope, Bowman, Los Molinos, and Red Bluff)
- Delineation of Management Zones (MZs) based on hydrogeologic conditions, historical pumping, and minimum threshold risks
- Map series showing Management Zones

3. Sustainable Yield Determination

- Update and refine best available sustainable yield estimate for entire subbasin and for each Management Zone (acre-feet/year)
    - Sources: Updated GSP numerical model (2022–2025), DWR projections, local studies
    - Example: Tehama Subbasin sustainable yield ≈ 220,000–250,000 AFY (to be refined)
- Breakdown of sustainable yield components:
    - Native yield
    - Imported surface water (captured recharge)
    - Managed recharge potential
    - Climate change adjustment (–10% by 2070)

- Allocation of funds for consultant in Q1&2 of 2026 to further refine sustainable yield based on future data in addition to work completed to date

4. Pumping Allocation and Credit System

4.1 Base Allocation (Free Credits)

- For Management Zones below Measurable Objectives – All irrigated parcels within such management zone receives a base allocation expressed in acre-feet per acre (AF/AC) tied to the parcel
- Example of Calculation for Base Allocation for Management Zones below Measurable Objectives: Allocation (AF/AC) = Total Sustainable Yield for Management Zone divided by Total Irrigated Parcel Acres
- De Minimis users (e.g. parcels using less than 2 acre-feet per year) exempt from curtailment

4.2 Develop Credit System

- Credits provided for Base Allocation, Recharge, In-Lieu Activities, etc..
- Up to 5 years of unused allocation may be carried forward

4.3 Transferability of Credits

- Credits may be transferable (sale, lease, permanent transfer) within the same Subbasin
- Credits may be transferable by single landowner for own use within the same Subbasin
- Registry system administered by County or local GSA
- Simple online platform for credit transactions and tracking

4.4 Develop Consumption Tracking with Appeal System

5. Penalty Fee Structure (Demand Management Fee)

5.1 Excess Pumping Fee

- Where applicable, tiered escalating fee for every acre-foot pumped above Base Allocation to be determined based on economic analysis for fees
- Fees adjusted every 3–5 years based on recharge project costs and inflation
- Implement Penalty Fee Structure prior to 2032 (Interim Milestone) – Prop 26 or Prop 218

5.2 Dedicated Use of Excess Pumping Fee Revenue

- Groundwater recharge projects (on-farm, dedicated basins, in-lieu)
- In-lieu conversion (surface water)
- Well mitigation program for domestic wells impacted by overdraft
- Drought reserve storage projects

- Incentive programs (e.g. extended fallowing, multi-benefit land repurposing, development of surface water use infrastructure, irrigation efficiency, land purchase for areas in cone of depression, etc…)
- No use for general county funds

6. Curtailments and Increased Fees Based on Triggers – Rampdown to Safe Yield (Excess Pumping can't be perpetual)

6.1 Assessment in 2032 (Interim Milestone)
- Review data and adjust fees, if necessary
- Possible adjustment of total allowed average consumptive use

6.2 Assessment in 2037 (Interim Milestone)
- Review data and adjust fees, if necessary
- Possible adjustment of total allowed average consumptive use

7. Metering, Monitoring, and Reporting

- Satellite-based consumptive use reporting with option for grower to self-meter
- Self-metering annual pumping reports due by December 31

8. Appeals and Hardship Provisions

- Hardship committee for temporary relief (drought, crop failure, new permanent planting)
- Appeals process for allocation disputes

9. Implementation Timeline

2026: Administrative Fee Collection (subject to Prop 26 or Prop 218); Finalize Management Zones; and Establish Safe Yield per Management Zone
2027: Issue initial parcel credit allocations
2028: Consumptive use program complete; credit trading platform live
2032: First excess pumping fees assessed (2031 pumping)
2032: Review and assessment of safe yield and fee structures, with adjustments as needed
2037: Review and assessment of safe yield and fee structures, with adjustments as needed
2042: Achieve sustainable yield (SGMA deadline)

10. Next Steps/Action Items

- Planned outline/framework approved and adopted by TCFCWCD Board in Q1 2026 – to be further developed consistent with Implementation Timeline above

APPENDIX B

(To Be Adopted by Resolution and Amended as Needed)

Tehama Project - GSP Implementation Budget 1 1.03 1.06 1.09 1.12 Flood tax and GSA tax
Fee Study Item 2.4 - Financial Assurance Plan
Five Year Revenue Needs Assessment
Evaluate typical vs. minimal funding level scenarios

Tehama County Groundwater Sustainability Agency Budget Forcast

EXHIBIT "A"

FIVE YEAR TEHAMA GSA BUDGET

(Option: combine Operating/SGMA Costs...)		Add 3% Inflation		Add 3% Inflation		Add 3% Inflation	
Category	Proposed	Proposed	Proposed	Proposed	Proposed	Proposed	Comments
	FY2027	FY2028	FY2029	FY2030	FY2031		
OPERATING EXPENSES							
Legal Services							
General Legal Support	$55,000	$55,000	$55,000	$55,000	$55,000		Assumes County Counsel SGMA Compliance Support With Some Outside Counsel in Specialized
Total Legal Services	$55,000	$55,000	$55,000	$55,000	$55,000		
Technical Services							
Fee Process	$7,000	$7,000	$7,000	$7,000	$7,000		Reflects fee update costs.
Special Studies/Consultant Support	$30,000	$30,000	$30,000	$30,000	$30,000		Project studies, model calibrations, feasibility analysis, related items.
Total Technical Services	$37,000	$37,000	$37,000	$37,000	$37,000		
Administrative Services							
Administration and Management (0.75 FTE)	$160,000	$160,000	$160,000	$160,000	$160,000		County SGMA Program Manager/Technician Positions
Administrative Support (0.5 FTE)	$51,000	$51,000	$51,000	$51,000	$51,000		County SGMA Admin Assistant Support Position
District Overhead	$32,000	$32,000	$32,000	$32,000	$32,000		office, insurance, vehicles, HR etc.
Audits	$10,000	$10,000	$10,000	$10,000	$10,000		Covers cost of minimum biannual audit requirement for GSA
Outreach Materials/Printing & Copying	$15,000	$15,000	$15,000	$15,000	$15,000		Changed to $1,000 per month
Postage	$3,000	$3,000	$3,000	$3,000	$3,000		Prudent to have in budget
Website Development/Maintenance	$6,000	$6,000	$6,000	$6,000	$6,000		Necessary for GSP implementation occurs
Financial Services/Bookkeeping	$12,000	$12,000	$12,000	$12,000	$12,000		Regular reporting, preparation for audits.
Total Administrative Services	$289,000.00	$289,000.00	$289,000.00	$289,000.00	$289,000.00		
OPERATING EXPENSES SUBTOTAL	$381,000.00	$381,000.00	$381,000.00	$381,000.00	$381,000.00		
Operating Expenses Reserve (10%)	$38,000	$38,000	$38,000	$38,000	$38,000		Prudent to have in budget
TOTAL OPERATING EXPENSES	$419,000	$419,000	$419,000	$419,000	$419,000		
SGMA COMPLIANCE EXPENSES							
GSP Annual Monitoring/Reporting	$225,000	$225,000	$225,000	$225,000	$225,000		Assumes five (5) AR per year for SGMA compliance.
GSA Sub-basin Coordination	$20,000	$20,000	$20,000	$20,000	$20,000		Assumes quarterly GSA communications and coordination with sub-basins during GSP implementation.
GSP Periodic Evaluation/Amendments (@ 5 Yrs.)	$400,000	$400,000	$400,000	$400,000	$400,000		Assumes five (5) GSP updates with modeling every five years for SGMA compliance.
Monitoring/Data Management	$25,000	$25,000	$25,000	$25,000	$25,000		Assumes annual data upates with expanded monitoring network in A and C subbasins.
GSP Implementation Grant Funding Application	$20,000	$20,000	$20,000	$20,000	$20,000		Assumes availability of grant funds for GSP implementation activities.
SGMA COMPLIANCE EXPENSES SUBTOTAL	$690,000	$690,000	$690,000	$690,000	$690,000		
SGMA Compliance Expenses Reserve (10%)	$69,000	$69,000	$69,000	$69,000	$69,000		
TOTAL SGMA COMPLIANCE EXPENSES	$759,000	$759,000	$759,000	$759,000	$759,000		
TOTAL ANNUAL BUDGET	$1,178,000	$1,200,770	$1,228,640	$1,248,310	$1,268,080		Includes inflation

Notes:
Assumes GSA would meet quarterly with Glenn County/Water Commission Coordination.
Assumes Tehama County FCWCD would support GSA organizational operations including administrative, legal, insurance, and financial services aspects during post-GSP implementation period.
Assumes Admin/Mgmt. staff costs are based on County's approved 2025 Salary Schedule with 1.7 overhead multiplier to calculate full charge out rates.
Assumes GSP monitoring and reporting would be handled as an ongoing GSP implementation cost with consultant support.
Assumes Five Year Periodic Evaluations/Amendment updates would be funded over several budget years.
Assumes on-going grant funding procurement process to secure available State and Federal grants for GSP implementation.