Content for Compiled Comments on Alternative Proposal:

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 user groups.

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 A Credit System may be developed to include

- Credits provided for Base Allocation, Recharge, In-Lieu Activities, etc..

4.3 Transferability of Credits: A system may be developed to allow transfer or sale of credits between parcels and property owners.

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	Add 3% Inflation	
Category	Proposed	Proposed	Proposed	Proposed	Proposed	
OPERATING EXPENSES	**FY26/27**	**FY27/28**	**FY28/29**	**FY29/30**	**FY30/31**	**Comments**
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	offices ,insurance, vehicles, HR etc.
Audits	$10,000	$10,000	$10,000	$10,000	$10,000	Covers cost of minimum bi-annual 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 as GSP implementation occurs
Financial Services/Bookkeeping	$12,000	$12,000	$12,000	$12,000	$12,000	Regular reporting, preparation for audits.
Total Administrative Services	**$288,000.00**	**$288,000.00**	**$288,000.00**	**$288,000.00**	**$288,000.00**	
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	**$418,000**	**$418,000**	**$418,000**	**$418,000**	**$418,000**	
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 availibility 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	**$758,000**	**$758,000**	**$758,000**	**$758,000**	**$758,000**	
TOTAL ANNUAL BUDGET	**$1,176,000**	**$1,200,770**	**$1,223,640**	**$1,246,310**	**$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 on-going 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.

S Gruenwald Comments (1.8.2026)

Alternate Demand Management Plan

Pros:

- Provides a good general framework to define Demand Management, proposed voluntary and mandatory measures, and a timeline.
- Section 1.2 Stated goal of "…address and mitigate groundwater level decline…by reducing demand for groundwater…"
- It presumably copies other successful frameworks for Demand Management that have met DPR approval and are working in other areas of the State.
- Is general enough to allow flexibility during implementation, and allows for extensive stakeholder input.
- Presumably more defensible from a legal standpoint than the County plan…will either plan be immune from legal challenge though?

Cons:

- Implementation of Phase 1 and Phase 2 Measures cannot be considered until Communication and Engagement and Outreach Requirements in section 2 have been completed. 1.3 Phase 1 indicates immediate implementation, which is it? What is the anticipated timeline for completion of 2.5?
- Review and assessment of safe yield, confirmed by direct measurement of groundwater levels in RMP should be conducted annually, it cannot wait until 2032 or 2037.
- Base fee allocation methodology includes per acre fees for non-irrigated lands larger than 5 acres, this is going to be contested.

Appendix A

- Under Key mechanisms, what does “allocation of transferrable pumping credits” entail?
- Management Zones vs Special Zones? Both are referenced.
- Breakdown of sustainable yield components…elaborate on native yield, imported surface water, managed recharge potential.
- Pumping Allocation and Credit System
    - Base Allocation calculations seem pretty straightforward.
    - Is there a different allocation scenario for areas above MO?
    - Should we make a distinction between pumping allotment credits, recharge credits, and in lieu credits?
    - Credit system for in-lieu 1:1.
    - Lease, purchase or transfer of pumping credits from parcels previously unirrigated will have the net effect of increasing total demand on a finite pool of water, potentially leading to lowering per acre allotments for others in the subbasin or management zone. Legal challenge likely.
    - Transfer of pumping credits from previously irrigated parcels, same owner parcels and contiguous parcels within the management area is more palatable.
    - Credit system for recharge not 1:1 typically.
    - Carrying forward unused recharge credits needs conditions linked to 1.4.
    - Credit transfers should be within a Management Zone.
    - Any transferability of credits within a subbasin or management area may be problematic if it increases total demand and takes us further away from sustainability.
    - Demand management stated objectives is to reduce the demand for groundwater, presumably to avoid MT and work toward MO. If we continue to facilitate increasing total demand, are we working toward that goal?
    - Should we be considering a LIFO tiered system of allocation in Management Zones and/or conversion of dryland to irrigated land?
- Penalty Fee Structure
    - Excess pumping fees should not be a mechanism for allowing continued overdraft year to year.
    - Excess pumping fee structure by 2032 allows overdraft to continue until then.
    - What is the rationale for linking fee amounts/structure to recharge project costs?

    - Examine dedicated use of fee revenue to recharge projects and in-lieu conversion costs. Should those funds be financing private pumpers' irrigation system upgrades (to dual or surface water systems) or grower recoverable portion of recharge efforts? Keep it linked to GSA budget vs General Fund, but look closely at how we use that pot of money when it becomes available. Consider local tax credits for capital improvements to irrigation systems as an alternative incentive program.

- Curtailments and Fee increases based on triggers
    - Assessments and adjustments of total allowed groundwater use may need to be sooner than 2032, and more frequent and based on measurable results (groundwater levels in RMS).
    - Refine and delineate Management Areas in most need of our attention.
    - Prioritize installation of remote RMS measurement devices on all RMS locations, including DWR sites and cooperating landowner sites.
    - Prioritize actual management, considering 1.4 as a guide, instead of developing a plan that allows for increased total groundwater use in the short term.

From: Ian Turnbull
Sent: Monday, January 19, 2026 3:00 PM
Subject: Demand Management Plan Comments

General comments -

Overall I strongly believe we need to keep the DM plan's restrictive actions simple and as understandable to the average irrigator/user as possible. We need to look to other GSAs DM plans that have already been approved and take the best elements of each for incorporation. I think that we need to be focusing on MTs for coercive regulatory action not MOs. We should be using incentives to get water levels to move toward reaching MOs. People understand properly set MTs and why reaching them is a bad thing – wells are going dry. The last drought period gave valuable information that can be used here. We saw what water levels caused harm to many domestic wells. That is valuable information. Mandatory pumping restrictions may cause significant harm, so there better be a very good reason for restrictions to take effect. I believe that approaching an MT is seen as a "good reason" in most people's mind. For any plan to work there needs to be broad understanding and support for the plan. Without that support, any plan on paper will fail when it comes time to actually implement it.

All of the existing and added RMP's MOs and MTs need to be revisited and revised where needed.

We need to address what actions will be taken for areas that are hitting MTs before full DM Plan implementation.

For administrative and SGMA compliance costs, I believe that everyone should pay based on the amount of groundwater they use. Like it or not, SGMA is the law and it covers every groundwater user in a subbasin. As such, the base fee structure that pays for what it costs to comply with the SGMA law should reflect that. I think the only fair way to do that is to charge on a volumetric basis and it should apply to everyone who uses groundwater. The volume of use can be estimated for convenience of implementation, but it is still should be based on groundwater use.

Below are a few brief comments on the Alternative DM plan focusing on Appendix A –
Some areas of Appendix A are too detailed for this stage of development. The comments below are intended to show a rationale for inclusion, not to be included verbatim.

Section 2 – Plan Area and Management Zones
The delineation of management zones is supposedly based on a specific area in groundwater level decline. I take issue with the methodology used to define and area in decline. Drawing a straight line between two water levels at arbitrary points in time is not acceptable. As I have pointed out before, it ignores what levels have done between those points in time. It can be manipulated to show that things are worse that reality or better than reality. This methodology needs to be revisited and corrected so that it accurately reflects conditions.

I believe that is results from the recent Aerial AEM survey may be valuable in helping to define the boundaries of a management zone. It may help to show that the boundaries do actually reflect the differences in the water-bearing formations under the ground.

Section 4.2 and 4.3 – Develop Credit System and Transferability of Credits

Both are way too detailed for this stage of development. Any credit/transfer system must not provide a vehicle for making conditions worse in areas in decline. The system must not provide a vehicle for making conditions worse during periods of drought. The system must also not encourage ground that is not actively irrigated to be used for credits elsewhere.

TEHAMA COUNTY GROUNDWATER DEMAND MANAGEMENT PROGRAM (Identified as the Farm Bureau Plan)

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.

DOESN'T IT MAKE SENSE THAT THIS INCLUDE ALL COUNTY 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.

"SPECIAL ZONES OR MANAGEMENT ZONES". LETS FIGURE OUT WHAT IS LEGALLY DEFENSABLE FOR ALLOCATONS, ETC.

2. Stakeholder Communication and Engagement

(Precondition to Phase I and Phase II Implementation) THIS IS A NON-STARTER FOR ME UNLESS ITS DONE IN 2026. THE CORNING DOC SHOULD SUFFISE WITH MINOR MODIFICATIONS. OTHERWISE IT LOOKS LIKE ANOTHER WAY TO KICK THE CAN.

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 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.

INCLUDE CORNING. THIS SHOULD BE COUNTYWIDE. INTEGRATION WITH A GLENN COUNTY APPROACH IS UNKNOWN. BASIN SPECIFIC PLANS IS OVERKILL, UNNECESSARY, AND POTENTIALLY A WASTE OF LIMITED RESOURCES.

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. NON STARTER.

2.3 Outreach Milestones Prior to Phase

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.

STAKEHOLDER ENGAGEMENT HAS TO BE PART OF PHASE I IMPLEMENTATION- 2026 – 2031 AND NOT A PRECURSOR TO IMPLEMENTATION.

• **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:

PRIORITIZE

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)

NEED TO IDENTIFY THESE AS SHORT TERM ACTIONS.

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. THIS DOESN'T HAPPEN THROUGH ANNUAL REPORTS OR 5 YEAR REVIEWS.

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.

NOT SURE WHERE THIS COMES FROM. ALLOCATIONS BASED ON "CONSUMED VERSUS EXTRACTED"? ESTIMATES OF OVERDRAFT ARE BASED ON CHANGES IN GROUNDWATER LEVELS.

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).

NEED TO REVIEW THE TM.

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.

WEAK ON ADAPTIVE MANAGEMENT BUT I DON'T HAVE ANY SUGGESTIONS AT THIS POINT. PROBABLY MORE THAT WE HAVE TIME FOR. IS THERE ROOM FOR ANY GUIDANCE HERE?

7. Funding and Financing (THIS IS AN IMPORTANT DISCUSSION BUT SHOULD NOT BE PART OF THIS DOCUMENT. COSTS AND FUNDING APPROACH HAVE YET TO BE DISCUSSED OR RESOLVED BEYOND STAFF LEVEL. COST NUMBERS PRESENTED SO FAR ARE DATED - I'M HOPING WE SEE SOME SUBSTANTIATED NUMBERS SOON. ITS NOT A MANDATE THAT A FUNDING DISCUSSION BE INCLUDED HERE BUT A CONSIDERATION.)

~~**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 **(THIS IS GETTING INTO POLICY DISCUSSION. IF WE WANT TO GO DOWN THIS PATH I CAN ONLY SUPPORT "USER PAYS".)**

~~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) CORNING

• Delineation of Management Zones (MZs) based on hydrogeologic conditions, historical pumping, and minimum threshold risk.

• 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) NEED TO ALSO INCLUDE ACRE-FEET/IRRIGATED ACRE

• 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 (MEASURABLE OBJECTIVES OR MINIMUM THRESHOLD?) – 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/IRRIGATED 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 TO BE IMPLEMENTED IN 2027. DEFINING THE ISSUES IN THIS DM PLAN WOULD BE HELPFUL MOVING FORWARD.

- NO NET INCREASE IN GROUNDWATER EXTRACTION BASIN WIDE FOR OVERDRAFTED BASINS
- EFFECTIVE MONITORING MUST BE IN PLACE TO ASSESS LOCALIZED IMPACTS FROM GROUNDWATER EXTRACTION IN EXCESS OF SAFE YIELD
- GROWERS IRRIGATING BELOW THE SAFE YIELD SHOULD BE ELIGIBLE TO SELL CREDITS
- GROUNDWATER ELEVATIONS MUST BE MAINTAINED ABOVE THE MIMINIMUM THRESHOLDS FOR CREDITS TO OCCUR

- Credits provided for Base Allocation, Recharge, In-Lieu Activities, etc.. IN-LIEU CREDITS – NEED TO DEFINE THE PROGRAM AND ISSUES
- Up to 5 years of unused allocation may be carried forward THIS SHOULD BE CONDITIONAL

4.3 Transferability of Credits DOESN'T ADDRESS LOCALIZED IMPACTS? SHOULD THIS BE A TRANSPARENT PROCESS OR NOT?

- 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) I FEEL THAT WE'RE STILL AT STEP ONE AND WE HAVEN'T WEIGHED IN YET ON THE COUNTY FEE PROPOSAL

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 SOUNDS LIKE AN ECONOMIC ANALISIS MIGHT SUPPORT THE MINING OF GW WHEN IN OVERDRAFT? SHOULDN'T FEES BE SET AT THE MAXIMUM ALLOWABLE SO DEEP POCKETS DON'T CONTINUE TO MAKE GW CONDITIONS WORSE – MAKING IT MORE DIFFICULT TO REACH SUSTAINABILITY?
- Fees adjusted every 3–5 years based on recharge project costs and inflation NOT SURE HOW TO LOOK AT THIS. WHAT ARE WE TALKING ABOUT HERE?
- Implement Penalty Fee Structure prior to 2032 (Interim Milestone) – Prop 26 or Prop 218 I DON'T SUPPORT A FEE STRUCTURE BASED ON THE PERCENTAGE OF MOs APPROACH. IS THAT WHAT WE'RE TALKING ABOUT HERE? IS THAT WHAT YOU MEAN BY INTERIM MILESTONE? IS THAT LEGALLY SUPPORTED?

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

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) INTERIM MILESTONE IS AN ACTUAL THING (GW ELEVATION). IS THAT WHAT YOU'RE TALKING ABOUT?

- 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

2026 DEVELOP WATER CONSERVATION PROGRAM

2026 DEVELOP LAND FALLOWING PROGRAM

2026 DEVELOP CREDIT TRADING PROGRAM

2026 DEVELOP COMMUNICATIONS AND OUTREACH PROGRAM

~~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)

TEHAMA COUNTY GROUNDWATER DEMAND MANAGEMENT PROGRAM (Identified as the Farm Bureau Plan)

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.

DOESN'T IT MAKE SENSE THAT THIS INCLUDE ALL COUNTY 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.

TEHAMA COUNTY GROUNDWATER DEMAND MANAGEMENT PROGRAM

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  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.

Summary of Comments on L Merry_TCFB Demand Management Alternative Proposal Framework.pdf

Page: 1

Number: 1 Author: Elizabeth Merry Date: 1/22/26, 12:35:18 PM -08'00'
Why just those SBs?

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)

Why is this in DM? A CE Plan is required to be a part of our GSP. It is a separate issue and will be addressed by the Outreach Ad Hoc. This is a good starting doc for that, along with Corning's CE Plan. [1]

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 and prioritize [2] of interested parties. Domestic use highest priority [3]
- 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

The CE Plan does not need to be in place prior to implementation of DM. DM implementation should start immediately with Phase I. [4]

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~~ [5]
- 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,

Page: 2

Number: 1 Author: Elizabeth Merry Date: 1/22/26, 12:36:53 PM -08'00'

Why is this in DM? A CE Plan is required to be a part of our GSP. It is a separate issue and will be addressed by the Outreach Ad Hoc. This is a good starting doc for that, along with Corning's CE Plan.

Number: 2 Author: Elizabeth Merry Date: 1/22/26, 12:37:31 PM -08'00'

and prioritize

Number: 3 Author: Elizabeth Merry Date: 1/22/26, 12:37:45 PM -08'00'

Domestic use highest priority

Number: 4 Author: Elizabeth Merry Date: 1/22/26, 10:49:56 AM -08'00'

The CE Plan does not need to be in place prior to implementation of DM. DM implementation should start immediately with Phase I.

Number: 5 Author: Elizabeth Merry Date: 1/22/26, 12:38:23 PM -08'00'

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.

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Number: 1 Author: Elizabeth Merry Date: 1/22/26, 10:51:04 AM -08'00'

Number: 2 Author: Elizabeth Merry Date: 1/22/26, 10:53:27 AM -08'00'

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.

1 Need more info on water marketing. Both fee structures are being looked at on the Commission level and once agreed upon, will be recommended to the Board.

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;

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Number: 1 Author: Elizabeth Merry Date: 1/22/26, 11:56:55 AM -08'00'

Need more info on water marketing. Both fee structures are being looked at on the Commission level and once agreed upon, will be recommended to the Board.

- 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

No need for Section 7. Funding for Admin and PMA will be provided through the fee structures currently being created at the Commission level. The Commission voted to calculate fees volumetrically. Board agreed. Fee structure is not part of the DM Plan.

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

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Number: 1 Author: Elizabeth Merry Date: 1/22/26, 12:16:47 PM -08'00'

No need for Section 7. Funding for Admin and PMA will be provided through the fee structures currently being created at the Commission level. The Commission voted to calculate fees volumetrically. Board agreed. Fee structure is not part of the DM Plan.

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~~ 1
  - ~~Fee Structure for Users above Safe Yield – Fees dedicated for projects to achieve sustainability goals~~ 2
  - Allocation of transferable pumping credits + tiered fee structure **Need more info.** 3
  - 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)

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Number: 1 Author: Elizabeth Merry Date: 1/22/26, 12:18:11 PM -08'00'

Number: 2 Author: Elizabeth Merry Date: 1/22/26, 12:18:21 PM -08'00'

Number: 3 Author: Elizabeth Merry Date: 1/22/26, 12:18:50 PM -08'00'

Need more info.

- 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

I need to learn more about how this would work. It seems like it could result in more pumping. [1]

- 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

No permanent transfer and need limits on credit hoarding [2]

- 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

Shouldn't Subbasin be Management Zone?

- 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~~ program [5] [4] 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

Prioritize this list - recharge is not the top priority [6]

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Number: 1 Author: Elizabeth Merry Date: 1/22/26, 12:57:49 PM -08'00'

I need to learn more about how this would work. It seems like it could result in more pumping.

Number: 2 Author: Elizabeth Merry Date: 1/5/26, 9:12:35 AM -08'00'

No permanent transfer and need limits on credit hoarding

Number: 3 Author: Elizabeth Merry Date: 1/22/26, 12:22:14 PM -08'00'

Shouldn't Subbasin be
Management Zone?

Number: 4 Author: Elizabeth Merry Date: 1/22/26, 12:23:33 PM -08'00'

program

Number: 5 Author: Elizabeth Merry Date: 1/22/26, 12:23:02 PM -08'00'

Number: 6 Author: Elizabeth Merry Date: 1/22/26, 12:27:05 PM -08'00'

Prioritize this list - recharge is not the top priority

- 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 **This should go without saying, but touché.** [1]

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: [2] ~~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)

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Number: 1 Author: Elizabeth Merry Date: 1/22/26, 12:27:53 PM -08'00'

This should go without saying, but touché.

Number: 2 Author: Elizabeth Merry Date: 1/22/26, 12:32:35 PM -08'00'

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

January 27th Demand Management Working Group CANCELLATION notice

Steve Gruenwald <steve@growers-choice.net> Fri, Feb 6, 2026 at 6:36 PM
To: Liz Merry <lizmerry58@gmail.com>
Cc: Michael Ward <mward5577@outlook.com>, Ian Turnbull <ian_turnbull@ruralits.com>, Lena Sequeira <lsequeira@tcpw.ca.gov>, "bflynn@pacificfarms.net" <bflynn@pacificfarms.net>, "bmyhre@wildlifewestinc.com" <bmyhre@wildlifewestinc.com>, Hal Crain <halcrain@crainranch.com>, Justin Jenson <jjenson@tcpw.ca.gov>, "toddhamer@sbcglobal.net" <toddhamer@sbcglobal.net>, "wborror5@gmail.com" <wborror5@gmail.com>, Adam Englehardt - District 2 <aenglehardt@outlook.com>, Adriana Langarica <alangarica@tcpw.ca.gov>, Stephanie Horii <shorii@cbi.org>

I think everyone who is going to share written comments has done so, and that was our assignment to complete before our next DM meeting. I'm fine not having the lawyer from down south in the room, and would actually prefer him to be remote but available for comment when appropriate. I believe Greg Jones and Justin Jensen were waiting for a 'scope of proposed work' and rough estimate of cost to get approval to hire him, and he had not provided us with that the last I heard earlier this week. We should have a pretty good idea of his hourly rate based on the work he's helped with so far. With or without him on board, I would also like to get together to discuss our comments, concerns, and proposed edits to the alternate plan, which at this point seems to have the most support from the group. We don't need a legally perfect set of recommendations or proposals to forward to the commission, but we do need to produce recommendations and/or a straw proposal.

For the most part I like the boilerplate document we have, with some exceptions:

1) The requirement for completion of 2.2 and 2.3 prior to implementation of Phase 1 measures, which do specifically state in 1.3 to be "moved forward for immediate implementation". The agricultural community is already engaged in many Phase 1 measures, and I think we can recommend Phase 1 measures continue and expand in scope concurrently with outreach milestones described in 2.2 and 2.3.
Efforts to rework much of the public engagement (listening sessions, workshops, targeted engagement, and public review of draft Phase 1 measures) looks like an effort to kick the can further down the road than we already have.

2) System of credits, trading, and marketing. This needs to be examined carefully and through the lens of our goals spelled out in section 1.2, ..."Program is to address and mitigate overdraft...by reducing demand for groundwater". Furthermore, just because it's legally defensible doesn't necessarily mean we want it in our plan if it takes us further away from our sustainability goals.

3) I would like to see some triggers incorporated into our annual evaluations that would consider limited Phase 2 measures should we see undesirable results (e.g. continued groundwater decline toward MT). I'm uncomfortable waiting until 2032 to take action.

4) As the DM working group, are we asked to weigh in on funding and financing (section 7)? If so, I would advocate for the majority of the costs to be borne by those pumping the most groundwater...volumetric fees. Minimal flat per parcel fees for residential, dryland, rangeland, and a small annual de minimis user wellhead fee.

5) Appendix A goes further into detail than I think it needs to be at this stage. I would like to see some sections of 4 and 5 edited, conditional/commensurate with conditions, or removed.

Just my $.02 for now. I'm in favor of meeting again sooner rather than later. Next week works for me.

Steve Gruenwald
Growers' Choice Crop Consulting, Inc.
530-519-8377

[Quoted text hidden]

FBDMP Comments

Michael Ward <mward5577@outlook.com> Sun, Feb 8, 2026 at 11:48 AM
To: Steve Gruenwald <steve@growers-choice.net>, Liz Merry <lizmerry58@gmail.com>, Ian Turnbull <ian_turnbull@ruralits.com>, Lena Sequeira <lsequeira@tcpw.ca.gov>, "bflynn@pacificfarms.net" <bflynn@pacificfarms.net>, "bmyhre@wildlifewestinc.com" <bmyhre@wildlifewestinc.com>, Hal Crain <halcrain@crainranch.com>, Justin Jenson <jjenson@tcpw.ca.gov>, "toddhamer@sbcglobal.net" <toddhamer@sbcglobal.net>, "wborror5@gmail.com" <wborror5@gmail.com>, Adam Englehardt - District 2 <aenglehardt@outlook.com>, Adriana Langarica <alangarica@tcpw.ca.gov>, Stephanie Horii <shorii@cbi.org>

Before I get started, I suggest that we meet next week. Michael Ward

More Comment…

FBDMP Section 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**).

THIS APPEARS TO BE A BLANKET STATEMENT SUPPORTING PROPOSED PROGRAM ELEMENTS IDENTIFIED IN THE TM. The TM includes issues that have never been fully resolved. Referencing this doc serves as an endorsement and should not be included in the draft plan. One of the issues is that it incorporates the current straw proposal management actions by the County:

1. **ISSUE: Management Action and Triggers -Management Action 1**. This action generates administrative fees based on fluctuations of GW elevations in relation to the MO. This has always been pointed out as a problem and has never been addressed.
    a. GW fluctuations relative to the MO should not be a source of revenue generation for the GSA. If we don't all agree we need to discuss this in more detail. That said, I think the approach is good monitoring strategy. We need to focus on MT exceedances.
2. **ISSUE: Management Action and Triggers – Management Action 2**. I support this approach, but I don't think we incorporate the material into the draft.
    a. I appreciate LSCE efforts here, but the TM stops short of even suggesting that any aspect of this is legally supportable or under what condition it is supportable. The TM is a general summary of what we've seen over the last couple of years and provides no new insights here. I'm still waiting for a legal opinion that supports it. Thiessen polygons probably work fine for "monitoring, public safety, research, modeling, and resource assessments", as the TM lays out, but can they serve for regulatory compliance, or do we need a better foundation? Purpose matters here.
3. **TM Section: Parcels Subject to the DMP** suggests policy that all parcels that are not federal and state will be subject to DM fees. If this is not what is being proposed, why do we identify the "number of parcels applicable to fees."

From: Steve Gruenwald <steve@growers-choice.net>
Sent: Friday, February 6, 2026 6:36 PM

APPENDIX A

(To Be Adopted by Resolution and Amended as Needed)

Proposal Appendix Updated: 1/12/2026 per Groundwater Demand Management Working Group 1/7/2026 Meeting Discussion

Priority Topics for DMWG discussion (Jan-Mar 2026). Not necessarily to be discussed in this order:

2: Plan Area and Management Zones
3: Sustainable Yield Determination
4. Pumping Allocation
5. Credit System
6. Penalty Fee Structure
7. Curtailment

1. **Executive Summary**
   1.1. Purpose and legal authority (SGMA, Tehama County ordinances)
   1.2. Plan goals: Achieve sustainable yield by 2042, protect critical domestic wells, maintain agricultural viability
   1.3. 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, with conditions. + tiered fee structure
   - Other as determined to be necessary

2. **Plan Area and Management Zones**
   2.1. Subbasins (Antelope, Bowman, Los Molinos, Corning, and Red Bluff)
   ~~2.1.~~2.2. Define RMP ground water level decline that considers year to year fluctuations
   ~~2.2.~~2.3. Delineation of Management Zones (MZs) based on hydrogeologic conditions, historical pumping, and minimum threshold risks
   ~~2.3.~~2.4. Map (to the individual parcel level) series showing Management Zones

3. **Sustainable Yield Determination**
   3.1. 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

Commented [3]: District straw proposal outlines a potential option for management zones approach (using Thiessen first, then integrate hydrogeologic conditions)

Commented [5]: District straw proposal outlines a potential option for calculating sustainable yield (combined safe yield areas)

- Example: Tehama Subbasin sustainable yield ≈ 220,000–250,000 AFY (to be refined)
- Verify/validate the sustainable yield estimate for each subbasin, management area, and special zone using RMS data.
-

3.2. Breakdown of sustainable yield components:

- Native yield
- Imported surface water (captured recharge)What is this term?
- Managed recharge potential What is this?
- Climate change adjustment (–10% by 2070)

3.3. 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~~

4.1. Base Allocation

- 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

5. Credit System

5.1. A Credit System may be developed to include

- Credits provided for Base Allocation, Recharge, In-Lieu Activities, etc.

5.2. Transferability of Credits: A system may be developed to allow transfer or sale of credits between parcels and property owners. Transfer, sale, or lease of groundwater or surface water credits must be consistent with the Goals and Objectives of the Resolution stated in Section 1.2.

5.3. Any credit/transfer system developed must not make conditions worse in areas in decline

5.4. Any credit/transfer system developed must not make conditions worse in periods of drought

~~5.2.~~5.5. Any credit/transfer system developed must not encourage ground that is not actively irrigated to be used for credits elsewhere.

~~5.3.~~5.6. Develop Consumption Tracking with Appeal System

6. Penalty Fee Structure (Demand Management Fee)

Commented [6]: Maybe we don't need this list in the official proposal (but could include as an attachment or additional notes)

Commented [7]: imported surface water includes SW imported for irrigation and for recharge.

Commented [9]: Ask legal counsel re: use of "may" vs. "shall"

Commented [10]: Suggestions to consider:
•3-tiered fee structure
•Additional backstop(s): For example, something more than a monetary-based backstop?

6.1. 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 commensurate with issues. based on recharge project costs and inflation
- Implement Penalty Fee Structure prior to 2032 (Interim Milestone) commensurate with issues. – Prop 26 or Prop 218

6.2. 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

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

7.1. Assessment annually beginning in 2027.in 2032 (Interim Milestone)
- Review data and adjust fees, if necessary
- Possible adjustment of total allowed average consumptive use

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

8. ~~Metering,~~ Monitoring, Self-Metering, and Reporting

~~7.3.~~8.1. Potential monitoring, reporting, and voluntary metering mechanisms:
- Satellite-based consumptive use reporting with option for grower to self-meter
- Self-metering annual pumping reports due by December 31

~~8.~~9. Appeals and Hardship Provisions

~~8.1.~~9.1. Hardship committee for temporary relief (drought, crop failure, new permanent planting)

~~8.2.~~9.2. Appeals process for allocation disputes

~~9.~~10. Implementation Timeline
- 2026: Administrative Fee Collection (subject to Prop 26 or Prop 218); Finalize Management Zones; and Establish Safe Yield per Management Zone

Commented [11]: Flagging for future discussion to explore the potential specific approaches. For instance, District's straw proposal is a potential example approach.
Other example basins to explore: Ventura, S. Crl Valley basins

Commented [12]: J Hughes legal advice: Specify timelines and dates for DWR

- 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.~~11. Next Steps/Action Items

- Planned outline/framework approved and adopted by TCFCWCD Board in Q2 2026 – to be further developed consistent with Implementation Timeline above

Commented [13]: Consider alternatives for areas of higher concern (already at/below their GSPs' MTs):

Perhaps move up the timelines (similar to how SGMA treats critically over-drafted basins)

TEHAMA COUNTY GROUNDWATER DEMAND MANAGEMENT PROGRAM

Framework for the Antelope, Red Bluff, Corning 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. 2-2024 and 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 and Corning 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 four ~~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, and 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~~ In conjunction with Phase I voluntary measures and prior to adoption of 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, Corning, 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~~ Continue the use of current 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, Corning) 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~~ adopting 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~~ may 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.
- Measurement and evaluation of groundwater measurements in RMP with respect to MT for those points.

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 groundwater user groups.

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.

De minimis groundwater users, including domestic, non irrigated land, rangeland, forest land using less than 2 ac ft per year will only incur a base allocation fee per wellhead.

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). Additional fees of this type shall be funded from volumetric fees (estimated or self reported) for any well classified as other than a de minimis well. 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 as soon as practicable. ~~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, at their discretion, an ~~any~~ environmental review determined ~~necessary~~ prudent 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)

Proposal Appendix Updated: 1/12/2026 per Groundwater Demand Management Working Group 1/7/2026 Meeting Discussion

Priority Topics for DMWG discussion (Jan-Mar 2026). Not necessarily to be discussed in this order:

2: Plan Area and Management Zones
3: Sustainable Yield Determination
4. Pumping Allocation
5. Credit System
6. Penalty Fee Structure
7. Curtailment

1. Executive Summary

1.1. Purpose and legal authority (SGMA, Tehama County ordinances)

1.2. Plan goals: Achieve sustainable yield by 2042, protect critical domestic wells, maintain agricultural viability

1.3. 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, with conditions. ~~+ tiered fee structure~~
- Other as determined to be necessary

2. Plan Area and Management Zones

2.1. Subbasins (Antelope, Bowman, Los Molinos, Corning, and Red Bluff)

~~2.1.~~2.2. Define RMP ground water level decline that considers year to year fluctuations

~~2.2.~~2.3. Delineation of Management Zones (MZs) based on hydrogeologic conditions, historical pumping, and minimum threshold risks

~~2.3.~~2.4. Map (to the individual parcel level) series showing Management Zones

3. Sustainable Yield Determination

3.1. 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)
- Verify/validate the sustainable yield estimate for each subbasin, management area, and special zone using RMS data.
-

3.2. Breakdown of sustainable yield components:
- Native yield
- Imported surface water (captured recharge)What is this term?
- Managed recharge potential What is this?
- ~~Climate change adjustment (–10% by 2070)~~

3.3. 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

4.1. Base Allocation
- 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

5. Credit System

5.1. A Credit System may be developed to include
- Credits provided for Base Allocation, Recharge, In-Lieu Activities, etc.

5.2. Transferability of Credits: A system may be developed to allow transfer or sale of credits between parcels and property owners. Transfer, sale, or lease of groundwater or surface water credits must be consistent with the Goals and Objectives of the Resolution stated in Section 1.2.

5.3. Any credit/transfer system developed must not make conditions worse in areas in decline

5.4. Any credit/transfer system developed must not make conditions worse in periods of drought

~~5.2.~~5.5. Any credit/transfer system developed must not encourage ground that is not actively irrigated to be used for credits elsewhere.

~~5.3.~~5.6. Develop Consumption Tracking with Appeal System

6. Penalty Fee Structure (Demand Management Fee)

6.1. 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 commensurate with issues. ~~based on recharge project costs and inflation~~
- Implement Penalty Fee Structure prior to 2032 (Interim Milestone) commensurate with issues. – Prop 26 or Prop 218

6.2. 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

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

7.1. Assessment annually beginning in 2027.~~in 2032 (Interim Milestone)~~

- Review data and adjust fees, if necessary
- Possible adjustment of total allowed average consumptive use

~~7.2. Assessment in 2037 (Interim Milestone)~~

- ~~Review data and adjust fees, if nec~~Assessmessary

~~•~~7.2. ~~Possible adjustment of total allowed average consumptive use~~

8. Metering, Monitoring, Self-Metering, and Reporting

~~7.3.~~8.1. Potential monitoring, reporting, and voluntary metering mechanisms:

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

~~8.~~9.Appeals and Hardship Provisions

~~8.1.~~9.1. Hardship committee for temporary relief (drought, crop failure, new permanent planting)

~~8.2.~~9.2. Appeals process for allocation disputes

~~9.~~10. 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.~~11. Next Steps/Action Items

- Planned outline/framework approved and adopted by TCFCWCD Board in Q2 2026 – to be further developed consistent with Implementation Timeline above

TEHAMA COUNTY GROUNDWATER DEMAND MANAGEMENT PROGRAM

Framework for the Antelope, Red Bluff, Corning 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. 2-2024 and 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 and Corning 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 four 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, and 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 In conjunction with Phase I voluntary measures and prior to adoption of 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;
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- 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 Continue the use of current 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, Corning) 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).

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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.

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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.

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

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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.

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  Implemented at Program start following Stakeholder Engagement and focused on voluntary, incentive-based demand reduction and land/water management practices.
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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.

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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;

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- 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;

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5.2 Implementation Protocol (Required Items)

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

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Commented [1]: This really exceeds what the Demand Management Working Group was asked to do. The Groundwater Commission has already weighed in on how administration, monitoring and other "keeping the lights on" expenses should be funded. With the possible exception of Section 7.4 I think it should be removed from the DM plan.

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4. Pumping Allocation
5. Credit System
6. Penalty Fee Structure
7. Curtailment

1. **Executive Summary**
   1.1. Purpose and legal authority (SGMA, Tehama County ordinances)
   1.2. Plan goals: Achieve sustainable yield by 2042, protect critical domestic wells, maintain agricultural viability
   1.3. 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, with conditions. + tiered fee structure
   - Other as determined to be necessary

2. **Plan Area and Management Zones**
   2.1. Subbasins (Antelope, Bowman, Los Molinos, Corning, and Red Bluff)
   ~~2.1.~~2.2. Define RMP ground water level decline that considers year to year fluctuations
   ~~2.2.~~2.3. Delineation of Management Zones (MZs) based on hydrogeologic conditions, historical pumping, and minimum threshold risks
   ~~2.3.~~2.4. Map (to the individual parcel level) series showing Management Zones

3. **Sustainable Yield Determination**
   3.1. 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

Commented [2]: Out of scope as indicated earlier.

Commented [4]: Consider the Sensitivity approach for defining Management Zone a boundary. Refer to the Northern Delta-Mendota Region Pumping Reduction Plan GWL-MT Avoidance Plan slide (6) by EKI.

- Example: Tehama Subbasin sustainable yield ≈ 220,000–250,000 AFY (to be refined)
- Verify/validate the sustainable yield estimate for each subbasin, management area, and special zone using RMS data.
-

3.2. Breakdown of sustainable yield components:

- Native yield
- Imported surface water (captured recharge)What is this term?
- Managed recharge potential What is this?
- Climate change adjustment (–10% by 2070)

3.3. 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

4.1. Base Allocation

- 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

Commented [8]: I think that we need to be focusing on MTs for coercive regulatory action not MOs. We should be using incentives to get water levels to move toward reaching MOs. Look at the Northern Delta-Mendota Region Pumping Reduction Plan (attached to email). Specifically pages 4, 5, 6 and 15 and the GWL-MT Avoidance Plan slides (4, 5 and 6) by EKI. As groundwater levels trend down toward the MT action to reduce pumping is taken. Allocations are used as a backstop, not as the first action.

5. Credit System

5.1. A Credit System may be developed to include

- Credits provided for Base Allocation, Recharge, In-Lieu Activities, etc.

5.2. Transferability of Credits: A system may be developed to allow transfer or sale of credits between parcels and property owners. Transfer, sale, or lease of groundwater or surface water credits must be consistent with the Goals and Objectives of the Resolution stated in Section 1.2.

5.3. Any credit/transfer system developed must not make conditions worse in areas in decline

5.4. Any credit/transfer system developed must not make conditions worse in periods of drought

~~5.2.~~5.5. Any credit/transfer system developed must not encourage ground that is not actively irrigated to be used for credits elsewhere.

~~5.3.~~5.6. Develop Consumption Tracking with Appeal System

6. Penalty Fee Structure (Demand Management Fee)

6.1. 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 commensurate with issues. based on recharge project costs and inflation
- Implement Penalty Fee Structure prior to 2032 (Interim Milestone) commensurate with issues. – Prop 26 or Prop 218

6.2. 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

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

7.1. Assessment annually beginning in 2027.in 2032 (Interim Milestone)

- Review data and adjust fees, if necessary
- Possible adjustment of total allowed average consumptive use

7.2. Assessment in 2037 (Interim Milestone)

- Review data and adjust fees, if necAssessmessary

•7.2. Possible adjustment of total allowed average consumptive use

8. Metering, Monitoring, Self-Metering, and Reporting

~~7.3.~~8.1. Potential monitoring, reporting, and voluntary metering mechanisms:

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

~~8.~~9.Appeals and Hardship Provisions

~~8.1.~~9.1. Hardship committee for temporary relief (drought, crop failure, new permanent planting)

~~8.2.~~9.2. Appeals process for allocation disputes

~~9.~~10. 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.~~11. Next Steps/Action Items

- Planned outline/framework approved and adopted by TCFCWCD Board in Q2 2026 – to be further developed consistent with Implementation Timeline above