

DMWG Member Comments on Alternative Proposal | (Comments received Jan-Feb 2026)

DRAFT for discussion purposes only | March 17, 2026

Not representative of the full WG's viewpoints. Intended to support round robin discussion at March 17 meeting

	#	Issue / Topic	WG Member Perspectives (Gruenwald, Turnbull, Ward, Merry)
Framework Section	A	Program Scope	<ul style="list-style-type: none"> General support for adding Corning Subbasin (and potentially all Tehama County basins).
	B	Engagement Conditions	<ul style="list-style-type: none"> Support for Phase I voluntary actions and C&E Plan to proceed simultaneously. Phase I should NOT wait for full C&E Plan completion.
	C	LSCE TM in the Admin Record	<ul style="list-style-type: none"> Section 5.4 reference to LSCE TM should not constitute blanket endorsement. "May incorporate" acceptable, not "shall incorporate"
	D	SGMA Fee: Basis	<ul style="list-style-type: none"> Fees should be volumetric (usage-based), not flat per-acre. Assumed pumping volume per irrigated acre is an acceptable starting point; self-metering also ok as an alternative.
	E	Funding Provisions: Placement	<ul style="list-style-type: none"> Funding handled at Commission level: Section 7 should be removed or greatly condensed from the DM Plan. This is a governance question for the Commission/Board, not a DM design element
Appendix A	F	Plan Area & Management Zone Delineation	<ul style="list-style-type: none"> Thiessen polygon methodology may support monitoring but question on legal defensibility as the basis for regulatory action (fees, restrictions). Emerging question: do boundaries need to be set before April, or can the plan commit to a methodology and criteria for drawing them with better data?
	G	Sustainable Yield: Methodology & Update Cycle	<ul style="list-style-type: none"> Requesting clarity on how exactly SY will be calculated, applied, and updated Concerns because MOs were not all defined w/ robust process after MT revision (building SY regulation on MOs that need fixing first is not a workable foundation).
	H	Accuracy & Revision of Existing MOs and MTs	<ul style="list-style-type: none"> RMP MOs and MTs should be revisited and revised before serving as DM thresholds. Staff acknowledged several MOs are set incorrectly. DM-specific MOs/MTs may differ from GSP MOs/MTs (creates a terminology and legal coherence problem)
	I	Trigger Mechanism: MO vs. MT	<ul style="list-style-type: none"> MT exceedance = trigger for mandatory restrictions; MO departure = trigger for incentive measures only. Concern re: GW fluctuations relative to MO used to generate revenue for the GSA b/c many MOs are inaccurately set.
	J	Pumping Allocation, Credit System & Transferability	<ul style="list-style-type: none"> Credit transferability from previously unirrigated lands could net-increase demand; need explicit guardrails. Jan. 7 DMWG: plan should say "may include" a credit/trading system, not commit to one. Non-contiguous parcels in same SY area should be manageable as a portfolio
	K	Penalty Fee Structure & Revenue Dedication	<ul style="list-style-type: none"> Volumetric excess pumping fee: supported. Concern with fee-only structure with no pumping cap (could allow continued overdrafting by those who can pay; need a pumping backstop). Different perspectives on revenue priorities (recharge, in-lieu, well mitigation, drought reserve).
	L	Curtailment Timeline & Early-Trigger Provisions	<ul style="list-style-type: none"> 2032 as first assessment is too late. CBI-revised App A (Jan. 12): annual assessments begin 2027 with provisions for earlier Phase II triggers if GW levels decline toward MTs. Concern about current RMPs exceeding existing MTs
Overall Doc	M	Appendix A: Scope & Level of Detail	<ul style="list-style-type: none"> Some called for reducing Appendix A detail at this stage (risks locking in specifics). Others want more detail before deciding whether to support App A as written
	N	Plan Specificity & Legal Defensibility	<ul style="list-style-type: none"> Some want specific, enforceable commitments (teeth, domestic well protection) Others caution against over-committing before data justifies specifics (liability risk). Not a disagreement about need for a strong plan, it's differing views about where legal risk is higher: too vague or too specific.