COLUSA SUBBASIN

CGA/GGA Joint Board Meeting Packet
November 24, 2026

Staff Report

To: CGA-GGA Joint Board

Agenda Item: 3. Colusa Subbasin Periodic Evaluation and Plan Amendment

a. Receive updates on progress related to development of the Colusa Subbasin Periodic Evaluation and Plan Amendment.

Date: November 24, 2026

Background

In April 2024, the Glenn Groundwater Authority (GGA) and Colusa Groundwater Authority (CGA) submitted a Revised Colusa Subbasin Groundwater Sustainability Plan (GSP) to address deficiencies identified by the Department of Water Resources. The 2024 GSP was approved by DWR in February 2025. The determination letter included several Recommended Corrective Actions (RCAs) that should be addressed during the GSP Periodic Evaluation.

GSP Periodic Evaluations are required to be completed at least every five years. The Colusa Subbasin GSP Periodic Evaluation is due by January 28, 2027.

GSPs are living documents that must be adapted as new information becomes available and conditions change. Depending on the adaptations, GSP Plan Amendments may be required to capture the changes. The GSAs, with support from the Consultant Team, are developing the Colusa Subbasin GSP amendment, which will capture relevant updates related to GSP implementation and to address the RCAs. The amendment is anticipated to be adopted in January 2027.

A Public Review Draft was made available for public review and comment from October 9, 2026, through November 8, 2026. Comments received during the review period have been compiled and evaluated by the technical team. The team is addressing comments as appropriate and will provide an overview of the comments received, along with proposed updates to the document.

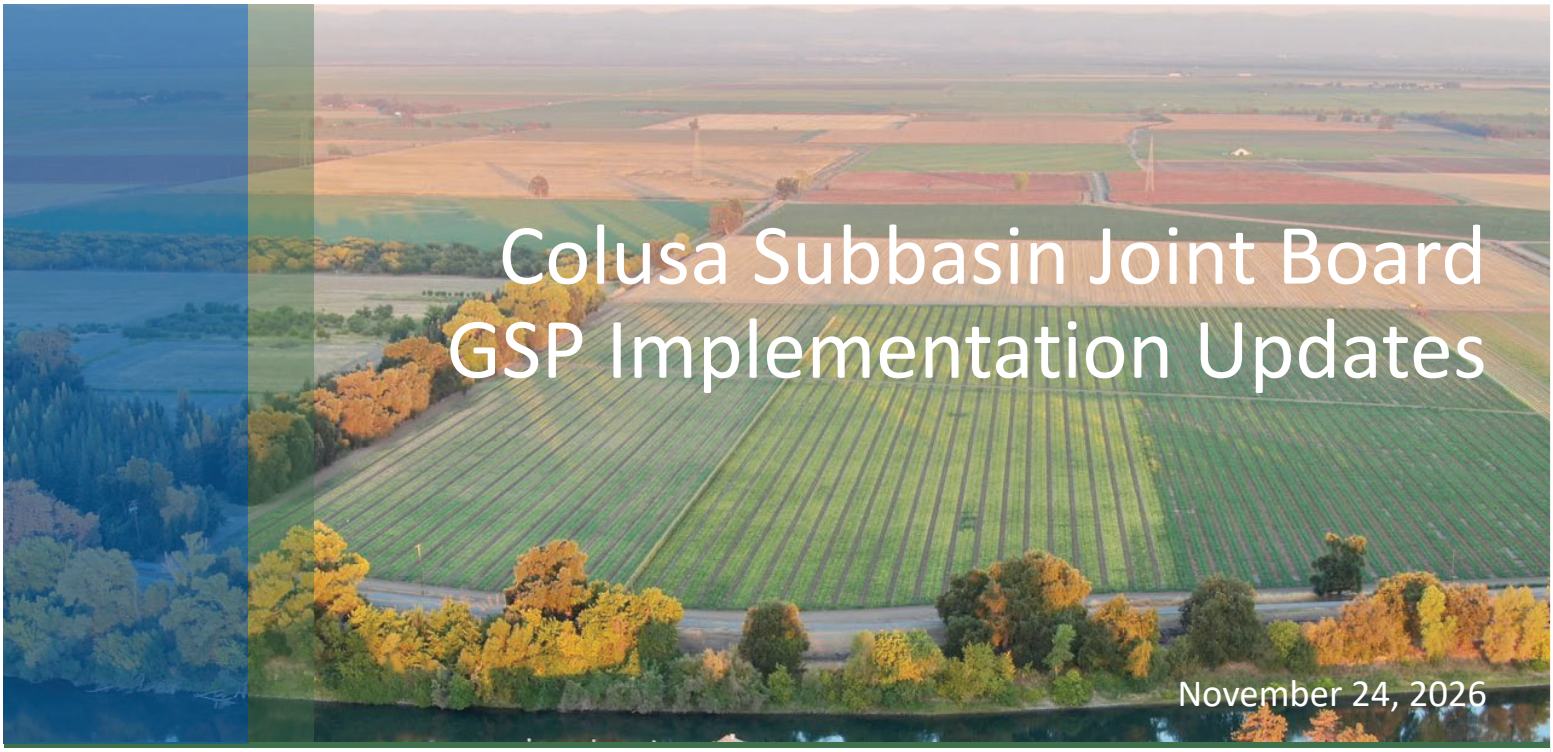
Staff, the consultant team, Counsel, and Board members will share updates and hold discussion relating to the Colusa Subbasin Periodic Evaluation and Plan Amendment.

Recommendation

1. Hold discussion and provide direction to staff, consulting team, legal counsel, and or committees as needed.

Attachments

- Draft Presentation



DRAFT Subject to Revision

Outline

- Item 3 - Colusa Subbasin Periodic Evaluation and Plan Amendment
- Item 4 - Grant Support
- Item 5 - Groundwater Demand Management Program Development

Joint Board Meeting Schedule

- 11/24/2026 - Review GSP plan amendment public comments, review Groundwater Demand Management (GDM) documentation, continue outreach efforts, review prop. 4
- 12/11/2026 - Periodic Evaluation review and feedback, finalize Groundwater Demand Management (GDM) documentation, continue outreach efforts
- 01/??/2027 - Public hearing for adoption of GSP Plan Amendment
- TBD

Note: 1173 = CGA; 1178 = GGA

DE Task Order Review and Update

Periodic Evaluation and Plan Amendment (1178.07)	Colusa Subbasin GSP WY 2026 Annual Report (1173.03.05)	Colusa Subbasin GSP Imp. Support (1173.05.03)	Groundwater Demand Management Program Development (1178.10)	GSP Implemen-tation Grant Support (1178.09)
~$10K Remaining	$46K Remaining	~$3K Remaining	$88K Remaining	$90K Remaining

Item 3 – Colusa Subbasin Periodic Evaluation and Plan Amendment

Plan Amendment Public Comment Review Period

Comment Type	General Input	Clarification	Suggestion	Requests	Comments
Number of Comments	3	1	4	4	4
Description	Additional Sources of Information	Confusion regarding hydrograph legend	Suggested additional language, studies, etc.	Additional clarification or justification	Comments on public engagement, funding, etc.

Periodic Evaluation Board Review Period

- Please have any feedback on the Periodic Evaluation sent to Lisa and Carol by December 4th

Item 4 – Grant Support

Solicitation of PMA Updates

- Annual report data requests were sent on 11/5/2026
- Responses are requested by 12/4/2026
- Information on PMA updates will be used in Prop 4 (and potentially other) grant opportunities

This is Ji Yeow Law with Davids Engineering. I am working with the Colusa and Glenn Groundwater Authorities to prepare the 2026 Colusa GSP Annual Report. As a key part of the GSP and the Annual Report, DWR requires that we quantify water supply and water use in the Colusa Subbasin, report updates on GSP projects, and evaluate potential impacts to water infrastructure due to land subsidence.

Related to these efforts, I wanted to reach out to you and CCWD with a few requests:

Water Supply Data: We are looking for **any available monthly water supply data for water year 2026** (i.e., Oct 2025-Sept 2026). This information would be incorporated into a water budget for the subbasin, and we want to be sure we are accounting for the best local information. In CCWD, this would include:

- Surface water diversions into CCWD (Note: We do already have data from USBR related to the Tehama-Colusa Canal. Are there any other water sources to report in 2026?)
- Surface water outflows from CCWD in 2026, if available (an estimated % of diversions is fine)
- Recharge volumes, if available

Project Updates for CCWD's GSP Projects:

We are also looking for any updates for the projects that CCWD has included in the GSP:

- **CCWD In-Lieu Groundwater Recharge Project**
- **RD108 and CCWD Agreement for Five-Year In-Lieu Groundwater Recharge Project**
- **Tehama-Colusa Canal Trickle Flow to Ephemeral Streams**

I have attached a Word doc that contains existing descriptions we have for these projects from the last Annual Report. Any updates that you have to this content would be greatly appreciated. In addition to being factored into this year's Annual Report, your updates would also help inform planning for Proposition 4 and other potential grant funding opportunities.

Information on any subsidence-related impacts to your infrastructure since April 2026, only if applicable: Specific questions we are hoping to answer are:

- **Have there been reported subsidence-related impacts to your infrastructure since April 2026?**
- ***Only if there have been reported impacts to your infrastructure*:**
  - What types of infrastructure have been impacted, and where?
  - What are the reported impacts?
  - Are the reported impacts ongoing, intermittent, or resolved?
  - What measures have been necessary, or will be necessary, to mitigate the impacts?

Please let me know if you have any questions or need any clarification! We would greatly appreciate your response by **Friday, December 4, 2026.**

Overview of Grant Opportunities

Grant	Agency	Concept Proposals Accepted	Final Application Due	Priority Topics	Award Amount	Total Grant Funding Pool	Eligible Applicants / Spatial Scale
Sustainable Groundwater Management	DWR	~Feb. 2027	TBD; ~ Summer 2027	Recharge/conjunctive use; subsidence BMPs; DWR Recommended Corrective Actions; ag land adaptation; conveyance	Up to $15 M per subbasin	$300M	GSAs or member agencies in medium/high-priority basins
Watershed Resilience – Conservation Implementation	DWR	~Feb. 2027	TBD; ~ Spring 2027	Agricultural and urban water conservation; climate resilience on a watershed basis	TBD	~$60M	Public agencies, special districts, JPAs, nonprofits, Tribes, mutual water cos.; watershed-scale
Multi-benefit Land Repurposing	DOC	~Mar. 2027	TBD; 2 phases beginning in ~Spring 2027	Repurposing irrigated ag land to cut groundwater use; community health, water supply, habitat, climate benefits	Up to $17M per grantee/region	Up to $200M Climate Bond; round amount set in NOFA	Regional block grants: 1+ critically overdrafted or high/medium-priority basins; must partner with a GSA

Grant Support Next Steps

- Upcoming grant workshops:
  - Review **SGM Implementation grant program** requirements, subbasin priorities, potential project opportunities, and propose criteria for project prioritization.
  - Select projects
- Draft Project Prioritization Criteria

Summarized Draft/Sample DWR Criteria for Grant Evaluation
Project Need & Feasibility
Quantifiable Benefits
Basin-Wide Coordination
Benefits to URCs, SDACs & Priority Communities
Domestic Well and Small Water System Benefits
Budget, Cost Share & Schedule Feasibility

Item 5 - Groundwater Demand Management (GDM) Program Development

GDM Ad Hoc Meetings (2026)

- January 2026 - Refocusing efforts after Water Accounting System (WAS) RFQ and selection process
- February 2026 - Groundwater budgets and sustainable yield
- March 2026 - GDM triggers and actions
- April 2026 - GDM triggers and actions, continued
- May 2026 - Water Accounting System updates and GDM triggers and actions, continued
- June 2026 - Outreach, Water Accounting System updates, GDM triggers and actions, continued
- July 2026 - GDM triggers and actions, continued
- August 2026 - Funding for GDM actions and outreach plan/framework (WAS statement/flyer)
- September 2026 - Outreach event debrief; GDM Action 0
- October 2026 - GDM Action 0; Draft GDM Program documentation review and discussion
- November 2026 - Draft GDM Program documentation review and discussion
- December 2026 - Approve final GDM Program documentation and outline next steps into 2027

GDM Program Report

1. Introduction
2. Groundwater Demand Management Triggers and Actions
   a. Overview
   b. Action 0
   c. Trigger and Action 1
   d. Trigger and Action 2
   e. Trigger and Action 3
3. Monitoring Approaches
   a. Groundwater Levels and Storage
   b. Land Subsidence
4. Program Implementation Timeline, Management, and Funding
   a. Annual Evaluation and Implementation
   b. Feedback and Review
   c. Funding and Financing
5. Public Outreach and Engagement
   a. Completed Outreach and Initial Feedback
   b. Future Outreach and Program Refinement
6. Appendix

Colusa Subbasin Groundwater Demand Management (GDM) Program Phases



GDM Program: Develop GDM Program By the End of 2026 (Commitment in 2024 GSP).

Initial Actions (0): Fully Prepare for GDM Action 2 (Mandatory Fee) and Action 3 (Allocation).

Triggered Actions (1, 2, and 3): Implement GDM Actions 1, 2, and 3 As Necessary In Response to Triggers.



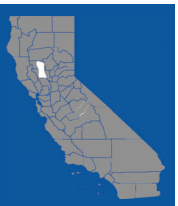




Development (2026)

Implementation (2027+)

Colusa Subbasin Groundwater Demand Management (GDM) Program Actions



Voluntary (Actions 0 and 1): Mobilize Communities to invest in GDM Actions in a voluntary way.

Mandatory (Action 2): Mobilize Communities to invest in GDM Actions in a mandatory way.

Allocation (Action 3): The backstop if voluntary or mandatory community investments fail.







DRAFT SUSTAINABILITY INDICATOR TRIGGER AND GDM ACTION SUMMARY

Sustainability Indicator	GDM Action 0	Trigger 1	GDM Action 1	Trigger 2	GDM Action 2	Trigger 3	GDM Action 3	SWRCB Intervention
Groundwater Levels/Storage	Implement WAS; continue PMAs, maximize State & Federal funds; coordinate voluntary landowner efforts; implement GDM outreach program, and fully prepare for GDM Action 2 and Action 3.	12.5% (6) RMS Wells reach the early warning level (50% between MO and MT) for 2 consecutive fall measurements.	Continue GDM outreach and education; encourage voluntary GDM actions; implement other strategic actions to prepare for GDM Action 2.	12.5% (6) RMS wells below 75% between MO and MT for 2 consecutive fall measurements.	Implement groundwater fees for GDM actions; continue GDM outreach and education; implement other strategic actions to prepare for GDM Action 3.	12.5% (6) RMS wells below MT for 2 consecutive fall measurements.	Implement groundwater allocation of sustainable yield, including considerations that may include transitional water, carryover, penalties, water markets, and related policies.	**Administrative fees:** $300/Well/Year and $20/AF of Groundwater Extracted (Probationary Subbasin). **Enforcement** – Including consideration of extraction limits, large penalties, and unknown SWRCB actions.
Cumulative Subsidence *(Since January 2024)*		> 0.5 ft at 3 contiguous sections within 1,000 ft of critical infrastructure.		> 1.0 ft at 2 contiguous sections within 1,000 ft of critical infrastructure.		> 2.0 ft for any sections.		
Annual Subsidence	Same as above.	> 0.10 ft/year at 6 contiguous sections for 2 consecutive years.	Same as above.	> 0.10 ft/year at 8 contiguous sections for 2 consecutive years.	Continue GDM outreach and education with specific focus on contiguous sections experiencing >0.10 ft/year of annual subsidence.	> 0.10 ft/year at 10 contiguous sections for 2 consecutive years.	Continue GDM outreach and education with specific focus on contiguous sections experiencing >0.10 ft/year of annual subsidence.	

FREQUENTLY USED ABBREVIATIONS

AF – Acre Feet
CGA – Colusa Groundwater Authority
DWM – Domestic Well Mitigation
DWR – Department of Water Resources
FT – Feet or Foot
GDM – Groundwater Demand Management
GGA – Glenn Groundwater Authority
GSA – Groundwater Sustainability Agency
GSP – Groundwater Sustainability Plan
MO – Measurable Objective
MT – Minimum Threshold
NGWI – Net Groundwater Impact
PMA – Project & Management Actions
RMS – Representative Monitoring Site
SGMA – Sustainable Groundwater Management Act
SWRCB – State Water Resources Control Board
WAS – Water Accounting System

Ad Hoc Recommendation: Annual Evaluation and Implementation Review

Draft Evaluation Timeline

- **Aug–Nov:** Review fall groundwater levels and DWR InSAR data. Analyze levels, storage, and subsidence, then calculate trigger metrics
- **Nov–Dec:** Prepare and internally review the Annual Report. Identify Trigger 1, 2, or 3 exceedances and notify the Joint Boards
- **Jan–Feb:** If a trigger has been, or is likely to be, exceeded, begin public discussions early
- **April:** Submit the Annual Report and trigger evaluation to DWR

Draft Implementation Timeline

- If a trigger is exceeded and a new action is to be initiated, then the action should be initiated by April in the following year.
  - For example, if a trigger is surpassed in WY2026, the corresponding action will be initiated by April 2027.

Looking Ahead: Action 0 - 3 Potential Timeline

Action 0 Activities	Potential Timeline	Action 1-3 Activities	Potential Timeline
Implement the water accounting system	December 31, 2027	Continue implementation of GDM outreach and education program with specific focus on and GDM Action 2 and motivating voluntary GDM actions	Depends on Trigger 1 exceedance
PMA Implementation	Ongoing	Implement groundwater fees and use for implementation of GDM Actions	Depends on Trigger 2 exceedance
GDM outreach, education programs, and coordination with landowners for voluntary efforts	Ongoing	Continue implementation of GDM outreach and education program with specific focus on GDM Action 3	Depends on Trigger 2 exceedance
Fully prepare and develop, but do not implement, GDM Action 2 (groundwater fees) and 3 (allocation program)	TBD	Implement a groundwater allocation program	Depends on Trigger 3 exceedance

Request to Joint Boards: Determine desired timeline to fully prepare and develop, but do not implement, GDM Actions 2 and 3. E.g., by December 31, 2028 or December 31, 2029, etc.

Outreach Event Recap

- Postcards sent to the top 90% of negative NGWI landowners
- 10 public participants at the 11/16 meetings; outreach has reached a total of 266 people
- Final virtual event on 12/02

	09/02 & 09/03	11/16
CGA	126	8
GGA	130	2
Total	**256**	**10**



Outreach Materials

- **Videos and FAQs**
  - Glenn Groundwater Authority SGMA Overview
  - Colusa Water Accounting Statement Explainer
  - Colusa_Subbasin_FAQs_20260903.pdf
- **Meeting Presentations**
  - Colusa_Subbasin_SGMA_201_CGA_20260902.pdf
  - Colusa_Subbasin_SGMA_201_GGA_20260903.pdf
- **Flyers and Example Statement**
  - Colusa_Subbasin_GDM_Program_Flyer_20260827.pdf
  - Colusa_Subbasin_Water_Accounting_System_Flyer_20260807.pdf
  - Example_Account_01_WY2025_Water Accounting_Statement_redacted_20260814.pdf
- **Maps**
  - Colusa_Groundwater_Authority_Overview_Map_20260902.pdf
  - Glenn_Groundwater_Authority_Overview_Map_20260903.pdf

COLUSA SUBBASIN

COLUSA SUBBASIN

SGMA AND GDM OUTREACH SUPPORT MANUAL

Groundwater Sustainability Plan Implementation Support

Prepared By

DAVIDS ENGINEERING, INC

October 2026



General Landowner Feedback and Water Accounting Improvements so Far

1. We are working with **parcel data** providers to review and update parcel address and boundary issues
2. We are updating the Frequently Asked Questions to clarify descriptions, impact of this preliminary data, landowner feedback and response timelines, and other relationships between datasets
3. We are continuing to work with the Colusa Subbasin Water Districts to improve **applied surface water** measurements and estimates
4. We are contemplating the removal of **land use** summaries from future statements to avoid confusion with other NGWI components

Note: This feedback will be incorporated to improve future water accounting efforts; revised WY2025 statements will not be sent out

Questions and Discussion

Staff Report

To: CGA-GGA Joint Board

Agenda Item: 4. Grant Support

a. Receive updates from staff and consultant team on grant support activities and timelines.

Date: November 24, 2026

Background

In July 2026, the GSAs approved an agreement with Davids Engineering (1178.09) to provide Colusa Subbasin GSP grant support services. The scope of services includes three tasks: (1) lead project prioritization workshops and request project information; (2) prepare SGM program grant application; and (3) provide on-call support for other grant applications.

Davids Engineering staff will provide an update on grant support activities.

Recommendation

1. Hold discussion and provide direction to staff, consulting team, legal counsel, and or committees as needed.

Attachments

- Draft Presentation (see Item 3 attachment)

Staff Report

To: CGA-GGA Joint Board

Agenda Item: 5. Groundwater Demand Management (GDM) Program Development

a. Receive updates from and provide direction to staff, consultant team, and ad hoc committee members on program development.
b. Provide direction to staff regarding approach for program implementation and program support.

Date: November 24, 2026

Background

The CGA and GGA Groundwater Demand Management (GDM) Ad Hoc Committees have been meeting jointly, generally with consultant support, to discuss and prepare recommendations to the GSAs on the development of a Groundwater Demand Management Program.

The ad hoc committees met November 12, 2026. During this meeting, the ad hoc committees focused on outreach updates and GDM Program Documentation.

Staff, the consultant team, and ad hoc committee members will provide an update.

Regarding Item 5.b., the GSAs should consider and determine an approach for future program implementation and ongoing program support. Beginning in January 2027, the GSAs will need to initiate implementation of Action 0, which is anticipated to involve significant outreach; policy discussions related to fee and groundwater allocation planning; technical work to update, refine, and maintain the water accounting system; preparation and distribution of water accounting statements; potential selection of a data platform or dashboard; and other related activities.

In determining the preferred approach, the GSAs should consider the anticipated scope of work, the level of ongoing technical and administrative support needed, whether the Colusa Subbasin GSAs would benefit from a project-specific or task-by-task procurement process or a longer-term technical support partner, and the most effective staffing and/or consultant support structure to facilitate successful and timely implementation.

Potential pathways forward include:

1. **Review Existing Proposals:** Review proposals received in response to the 2025 Request for Qualifications (RFQ) for Development and Implementation of a Water Accounting System to determine whether a firm could provide the necessary implementation and ongoing support services.

2. **Request Proposals from Specific Firms:** Solicit proposals from one or more specific firms with relevant experience and qualifications to support program implementation.

3. **Initiate a New Procurement Process:** Develop and issue a new Request for Qualifications (RFQ) or Request for Proposals (RFP) that reflects the anticipated scope of implementation and ongoing program support needs.

Staff is requesting direction from the GSAs on the preferred implementation and support structure, as well as the associated procurement pathway and any desired parameters or additional considerations. This direction will allow staff to proceed with the necessary procurement and coordination efforts in a timely manner to support implementation beginning in January 2027.

Ad Hoc Committee Members
CGA: Lewis Bair, Halbert Charter, Jeff Moresco, Jim Wallace

GGA: John Amaro (or Jeff Sutton), Mark Lohse (or Seth Fiack), Chuck Schonauer (or Justin Dahl)

Recommendation

1. Receive update from staff, consultant team, and ad hoc committee members.

2. Provide direction to staff, consulting team, legal counsel, and or committees as needed.

Attachments

- Draft Presentation (see Item 3 attachment)
- Draft GDM Program
- Colusa Subbasin SGMA & GDM Outreach Support Manual

DRAFT Colusa Subbasin Groundwater Demand Management Program Report

Prepared for

Colusa Groundwater Authority (CGA)
Glenn Groundwater Authority (GGA)

Prepared by

Davids Engineering, Inc.

December 2026

DRAFT

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Appendix

Appendix A. Water Accounting System Flyer
Appendix B. Example Water Accounting Statement

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1 Introduction

The Colusa Subbasin (Subbasin) is designated by the California (CA) Department of Water Resources (DWR) as a high-priority subbasin that forms part of the Sacramento Valley Groundwater Basin (DWR Bulletin 118 No. 5-021.52[1]). Groundwater from the Subbasin has historically supported the region's agricultural economy as well as nearly all domestic, municipal, and industrial water uses in the Subbasin portion of Colusa and Glenn Counties. Sustained reliance on groundwater has contributed to long-term overdraft and land subsidence, underscoring the need for measures that reduce groundwater demand, mitigate subsidence, and support compliance with the Sustainable Groundwater Management Act (SGMA).

The Subbasin is managed by two groundwater sustainability agencies (GSAs): the Glenn Groundwater Authority (GGA) and Colusa Groundwater Authority (CGA) (collectively referred to as the GSAs). The locations and areas managed by each GSA are summarized in **Table 1** and **Figure 1**. The two GSAs have collectively developed, adopted, and are now implementing one unified Groundwater Sustainability Plan (GSP) for the Subbasin. Under the GSP, the GSAs are monitoring and managing groundwater conditions in the Subbasin to achieve sustainability by 2042, with each GSA responsible for implementing projects and management actions (PMAs) to achieve the Subbasin's sustainability goal.

Table 1. Acreage and percent area represented by the Glenn Groundwater Authority and Colusa Groundwater Authority in the Colusa Subbasin.

GSA	GSA Abbreviation	GSA Area, Acres	GSA Area, % of Total
Glenn Groundwater Authority GSA	GGA GSA	305,918	42%
Colusa Groundwater Authority GSA	CGA GSA	418,107	58%
	Total	724,025	**100%**

The initial GSP was first adopted in January 2022. DWR issued an incomplete determination in October 2023. In the determination letter DWR provided to the GSAs, DWR identified deficiencies related to the Subbasin's assessment and management of overdraft conditions, Sustainable Management Criteria (SMC) for chronic lowering of groundwater levels, and SMC for land subsidence. DWR concluded that additional information, commitments, and implementation mechanisms were necessary to demonstrate how the Subbasin would achieve long-term sustainability.

In response, the GSAs coordinated development of the April 2024 GSP[2]. The 2024 GSP refined the Subbasin's approach to assessing overdraft, updated groundwater level and subsidence sustainability criteria, and incorporated specific implementation commitments intended to address DWR's identified deficiencies. To support approval of the 2024 GSP, the GSAs entered into a Memorandum of

[1] California Department of Water Resources (DWR). 2003. *California's Groundwater: Bulletin 118 – Update 2003*. Sacramento, California.

[2] The 2024 GSP is available on the Sustainable Groundwater Management Act (SGMA) Portal website: https://sgma.water.ca.gov/portal/gsp/.

Understanding (MOU) Establishing a Groundwater Demand Management (GDM) Program for the Subbasin of the Sacramento Valley Groundwater Basin included in Appendix 6E of the 2024 GSP. The MOU outlines the GSAs' commitment to actively refine and implement the GDM Program alongside other PMA efforts as a backstop. The GDM Program will serve as a means of mitigating overdraft and addressing undesirable results in the Subbasin if existing PMAs and other voluntary efforts are unable to sufficiently address groundwater sustainability issues.

Development of the GDM Program and the January 2027 GSP Amendment has been done in parallel. The GSAs will submit the January 2027 GSP Plan Amendment[3], which will update the evaluations of interconnected surface water and groundwater dependent ecosystems using new information, recent studies, and ongoing regional coordination, while clarifying future monitoring and data needs. The amendment will also update groundwater level sustainable management criteria based on recent conditions and technical information and will expand the discussion of groundwater quality management, monitoring, and coordination with regulatory agencies.

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[3] The January 2027 GSP Amendment is anticipated to be available beginning in February 2027 on the Sustainable Groundwater Management Act (SGMA) Portal website: https://sgma.water.ca.gov/portal/gsp/.

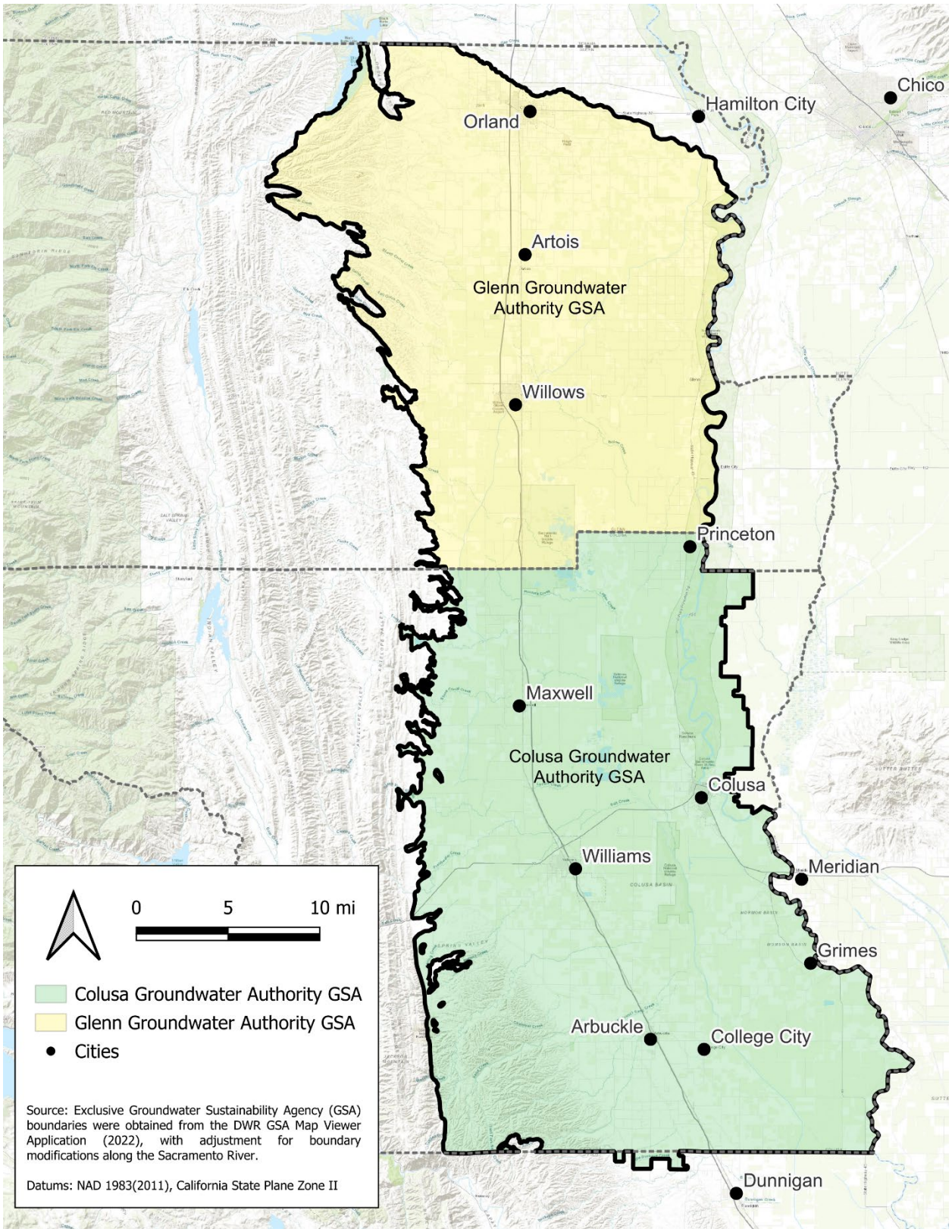


Figure 1. Colusa Subbasin Groundwater Sustainability Agencies.

A central principle of the MOU and the corresponding GDM Program is the use of adaptive GDM measures focused on a triggers and actions approach. The GDM Program begins with education, outreach, and voluntary actions intended to encourage groundwater conservation and support sustainable groundwater management. If groundwater conditions worsen and predefined triggers are exceeded, the GSAs will progressively implement more robust adaptive mandatory measures. Potential future actions would include groundwater demand reduction requirements, groundwater fees, groundwater allocations, or other management tools determined by the GSAs to be necessary and appropriate. The MOU also recognizes the importance of maintaining sufficient funding and financing mechanisms to support GDM Program administration, monitoring, outreach, enforcement, and ongoing refinement of GDM activities.

In 2024, each GSA formed a GDM Ad Hoc Committee to develop recommendations for the GSA Board of Directors (Boards) regarding development and implementation of the GDM Program. From 2024-2026, the GDM Ad Hoc Committees met jointly, typically monthly, to discuss and recommend decisions relevant to GDM Program development and implementation that were identified in the MOU. **Figure 2** summarizes the major milestones in development and implementation of the GDM Program thus far.

A foundational component of the GDM Program is the Subbasin Water Accounting System (WAS). The WAS provides a standardized framework for estimating and communicating Net Groundwater Impacts (NGWI) associated with agricultural land use and water management activities throughout the Subbasin. NGWI represents the net effect of land and water management practices on the groundwater system, calculated as water inflows [precipitation (P) and applied surface water (ASW)] minus water outflows [evapotranspiration (ET), runoff from precipitation (ROPR), and runoff from applied surface water (ROASW)]. Through the WAS, landowners receive periodic water accounting statements containing information intended to improve understanding of groundwater conditions and support informed decision-making.

Although the WAS is a critical tool that supports the GDM Program, it is important to distinguish the WAS from the GDM Program itself. The WAS serves as an information and accounting platform, providing consistent and transparent data that can support implementation, monitoring, outreach, and evaluation of management actions. The GDM Program encompasses a broader set of elements, including sustainability triggers, management actions, implementation procedures, funding mechanisms, monitoring requirements, outreach activities, and adaptive management processes. The WAS therefore supports, but does not independently constitute, the GDM Program. Additional information regarding the WAS is provided in Section 2.2.1 and **Appendices A** and **B**.

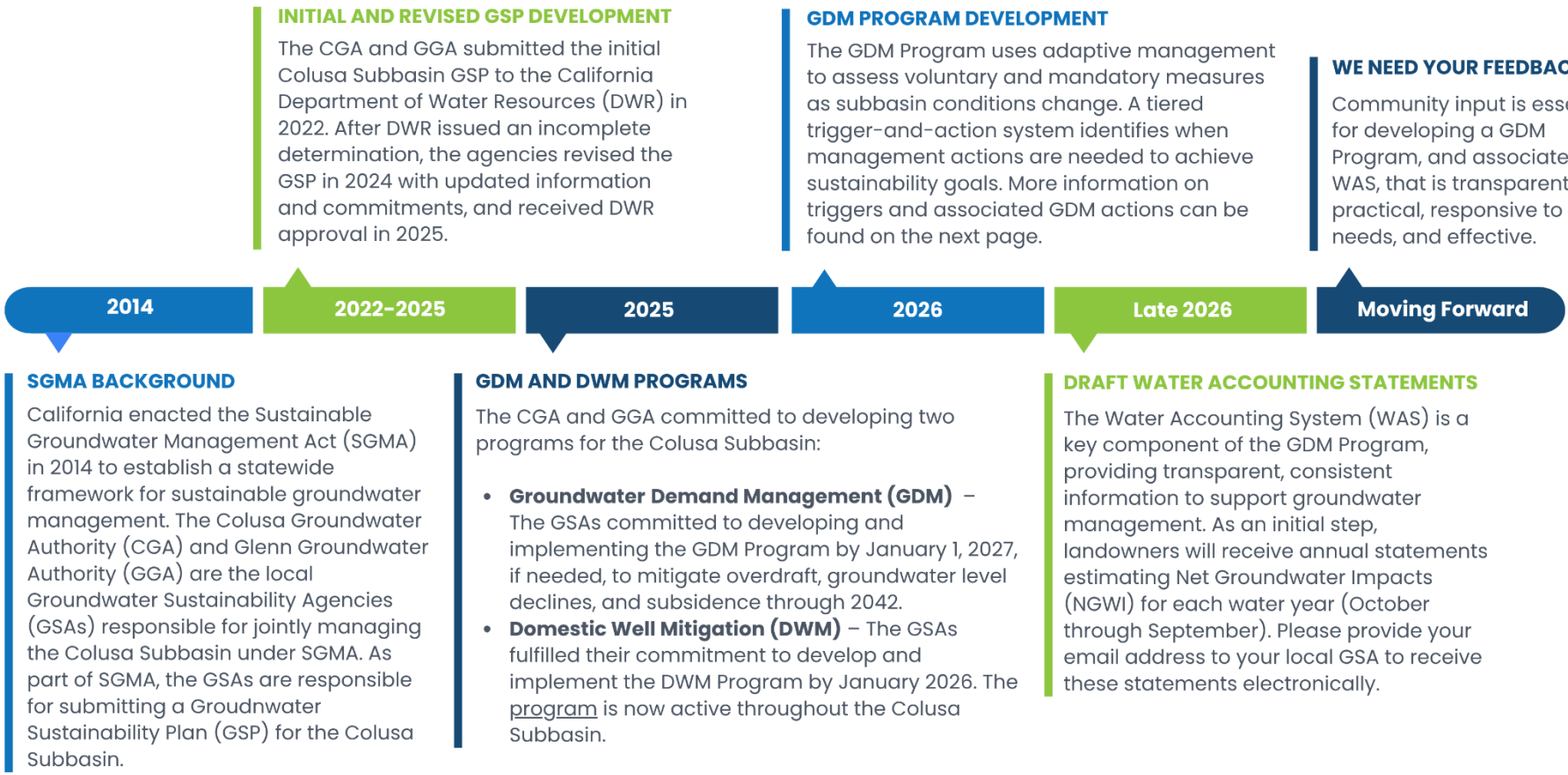


Figure 2. Colusa Subbasin Sustainable Groundwater Management and Groundwater Demand Management Timeline from 2014 to 2026.

The purpose of this report is to document the GSAs' programmatic approach to prepare for implementation of the GDM Program beginning in 2027. In this approach, the GSAs are preparing to implement potential measures – both voluntary and mandatory – if conditions in the Subbasin require targeted actions to address impacts stemming from subsidence or declining groundwater levels. To determine if, when, and where targeted actions are needed, the GSAs have developed an approach to evaluate and track conditions in the Subbasin compared to specific, measurable "trigger conditions" that demand increasing levels of action with increasing severity of subsidence or groundwater level decline. The trigger conditions are related to the SMC undesirable results that will be described in the 2027 GSP Amendment, ensuring that actions taken under this approach support achievement of the Subbasin sustainability goals. Within the 2027 GSP Amendment, Section 5.4.1 describes SMC related to Chronic Lowering of Groundwater Levels, Section 5.4.2 addresses Reduction of Groundwater Storage, and Section 5.4.5 addresses Inelastic Land Subsidence.

The GDM Program Document is outlined as follows:

- **Section 2** describes the trigger and action framework and their spatial extent, both voluntary and mandatory, that the GSAs are implementing, or are preparing to implement as necessary.
- **Section 3** describes monitoring approaches used to evaluate groundwater conditions and determine when and where management actions are necessary.
- **Section 4** describes program implementation, governance, and administration structures, and potential GSA funding and financing approaches.
- **Section 5** describes the completed public outreach and engagement activities and future opportunities to engage with the public during implementation.

DRAFT

2 Groundwater Demand Management Triggers and Actions

2.1 Overview

The GDM Program uses an adaptive trigger-and-action framework to link observed groundwater conditions with progressively stronger management responses. The framework evaluates three indicators—groundwater levels/storage, cumulative subsidence, and annual subsidence—compared to defined trigger thresholds. Action Zero (Action 0) remains active before any threshold is exceeded and establishes the technical, administrative, funding, and outreach foundation for implementation. Triggers 1 through 3 represent increasing levels of concern and correspond to Actions 1 through 3, which progress from continued outreach and voluntary measures to funding mechanisms, program readiness, and enforceable groundwater demand reductions. **Figure 3** summarizes the indicators, thresholds, and corresponding actions and should be read with Sections 2.2 through 2.5.

The triggers do not always produce identical responses. Groundwater levels/storage and cumulative subsidence follow the same escalating sequence because both can indicate broad, persistent deterioration requiring increasingly robust Subbasin management measures. Annual subsidence reflects the recent rate and spatial concentration of land-surface change; therefore, it may warrant targeted outreach and monitoring in affected areas without independently initiating the fees, allocations, or other mandatory measures associated with the groundwater level/storage and cumulative subsidence triggers.

2.2 Action 0

Action 0 is ongoing and will continue to remain active, representing the GDM Program development and implementation phase that occurs before any trigger threshold is exceeded. The primary objectives of Action 0 are to continue implementation of existing groundwater sustainability efforts, expand the Subbasin's understanding of groundwater conditions through water accounting, maximize available funding opportunities, support voluntary groundwater demand reduction activities, and ensure that the Subbasin is prepared to implement more robust management measures if future trigger thresholds are exceeded (**Table 2**).

Collectively, Action 0 establishes the technical foundation, stakeholder understanding, funding resources, and administrative readiness necessary to support adaptive groundwater management. The action level focuses on implementing the WAS, advancing existing PMAs, supporting voluntary groundwater demand reduction efforts, maximizing external funding opportunities, and preparing contingency management tools. These efforts are intended to improve groundwater conditions proactively while maintaining local control and ensuring the Subbasin is prepared to respond if future trigger thresholds indicate increasing sustainability concerns.

Sustainability Indicator	GDM Action 0	Trigger 1	GDM Action 1	Trigger 2	GDM Action 2	Trigger 3	GDM Action 3	SWRCB Intervention
Groundwater Levels/Storage	Implement WAS; continue PMAs, maximize State & Federal funds; coordinate voluntary landowner efforts; implement GDM outreach program, and fully prepare for GDM Action 2 and Action 3.	12.5% (6) RMS Wells reach the early warning level (50% between MO and MT) for 2 consecutive fall measurements.	Continue GDM outreach and education; encourage voluntary GDM actions; implement other strategic actions to prepare for GDM Action 2.	12.5% (6) RMS wells below 75% between MO and MT for 2 consecutive fall measurements.	Implement groundwater fees for GDM actions; continue GDM outreach and education; implement other strategic actions to prepare for GDM Action 3.	12.5% (6) RMS wells below MT for 2 consecutive fall measurements.	Implement groundwater allocation of sustainable yield, including considerations that may include transitional water, carryover, penalties, water markets, and related policies.	**Administrative fees:** $300/Well/Year and $20/AF of Groundwater Extracted (Probationary Subbasin). **Enforcement** - Including consideration of extraction limits, large penalties, and unknown SWRCB actions.
Cumulative Subsidence *(Since January 2024)*		> 0.5 ft at 3 contiguous sections within 1,000 ft of critical infrastructure.		> 1.0 ft at 2 contiguous sections within 1,000 ft of critical infrastructure.		> 2.0 ft for any sections.		
Annual Subsidence	Same as above.	> 0.10 ft/year at 6 contiguous sections for 2 consecutive years.	Same as above.	> 0.10 ft/year at 8 contiguous sections for 2 consecutive years.	Continue GDM outreach and education with specific focus on contiguous sections experiencing >0.10 ft/year of annual subsidence.	> 0.10 ft/year at 10 contiguous sections for 2 consecutive years.	Continue GDM outreach and education with specific focus on contiguous sections experiencing >0.10 ft/year of annual subsidence.	

FREQUENTLY USED ABBREVIATIONS

AF - Acre Feet
CGA - Colusa Groundwater Authority
DWM - Domestic Well Mitigation
DWR - Department of Water Resources
FT - Feet or Foot
GDM - Groundwater Demand Management
GGA - Glenn Groundwater Authority
GSA - Groundwater Sustainability Agency
GSP - Groundwater Sustainability Plan
MO - Measurable Objective
MT - Minimum Threshold
NGWI - Net Groundwater Impact
PMA - Project & Management Actions
RMS - Representative Monitoring Site
SGMA - Sustainable Groundwater Management Act
SWRCB - State Water Resources Control Board
WAS - Water Accounting System

Figure 3. Groundwater Demand Management trigger and action matrix with respect to each sustainability indicator.

Table 2. Action 0 implementation tasks, key activities, and timing.

Task	Key activities	Timing
Implement the WAS and distribute initial statements	• Implement the WAS; calculate NGWI and other water-budget components at the parcel scale. • Prepare and distribute water accounting statements to all accounts with 10 or more acres. Use accounting information to support outreach and future program evaluation.	Started in 2026 and ongoing
Continue PMA implementation and maximize funding opportunities	• Continue GSP PMAs, including recharge, monitoring improvements, water-supply enhancement, conservation programs, and technical studies. • Pursue state, federal, and other external funding and cost-sharing opportunities.	Ongoing
Continue support and coordination of voluntary landowner efforts	• Encourage recharge, in-lieu surface-water use, irrigation efficiency, conservation, fallowing, crop shifting, land repurposing, transfers, and other voluntary activities that reduce groundwater demand or increase aquifer replenishment.	Ongoing
Continue GDM outreach and education	• Provide information about the WAS, water accounting statements, NGWI, groundwater conditions, trigger thresholds and corresponding actions, PMAs, and available incentives. • Use workshops and other engagement activities to gather feedback and build stakeholder understanding.	Ongoing
Develop contingency groundwater fees and allocation frameworks	• Evaluate potential groundwater fees and allocations frameworks. Identify methodologies, data and measurement requirements, and consideration of policies for credits, carryover and transfer provisions, reporting, appeals, compliance, enforcement, and applicable legal pathways.	To be determined

2.2.1 Implement the Water Accounting System and Distribute Statements

A central component of Action 0 is implementation of the WAS. The WAS provides a mechanism for estimating the net impact of landowner practices on the groundwater system at multiple scales (pixel to parcel to basin wide) using available datasets and accounting methodologies. Further explanation of the WAS is provided in **Appendix A**, Water Accounting System Overview Flyer. As part of this effort, the GSAs have prepared and distributed water accounting statements that summarize water year 2025 groundwater accounting information for landowners with 10 or more acres within the Subbasin. An example water accounting statement is provided in **Appendix B**. These statements are intended to increase transparency, improve understanding of local groundwater conditions, and familiarize groundwater users with the data and concepts that may support future management actions. Water accounting information generated during Action 0 also provides a foundation for evaluating future allocation approaches, groundwater demand reduction strategies, and GDM Program effectiveness.

The WAS serves as a supporting implementation and communication tool for the GDM Program. Information generated through the WAS, including parcel-level and account-level NGWI calculations, ASW

information, and water accounting summaries, will be used to support outreach, education, GDM Program evaluation, and future implementation of fees or allocations if higher trigger levels are reached. The WAS does not determine whether a trigger has been exceeded. Rather, it provides supporting information that can help communicate groundwater conditions, evaluate potential management approaches, and inform implementation of future GDM actions.

2.2.1.1 NGWI Methods and Quality Assurance and Quality Control

Quality assurance and quality control (QA/QC) checks are built into the WAS at each step of the calculation. All values are checked to fall within reasonable physical bounds and checked to ensure no component is lost or double counted. The resulting NGWI is then checked against its individual components (P plus ASW, minus ET and runoff) to confirm that they match at every scale, from individual 30-meter grid cells (pixels) to parcels, GSAs, and the Subbasin. Results are also reviewed by the technical team before water accounting statements and reports are produced.

The WAS background and methods are documented in **Appendix A** and will continue to be refined as additional data becomes available. Landowner review of the annual water accounting statements is an important part of this process. All landowner feedback is reviewed and considered, both to correct the underlying data and to improve the methods themselves, so that NGWI is calculated as accurately as possible. Feedback on delivery records, crop classifications, and parcel or account information is especially valuable before the data are used to support future GDM Program decisions.

2.2.2 Continue PMA Implementation and Maximize Funding Opportunities.

Action 0 includes continued implementation of PMAs identified in the GSP. PMAs remain the primary mechanism through which the Subbasin seeks to achieve groundwater sustainability and may include activities such as recharge projects, monitoring improvements, water supply enhancement projects, conservation programs, and technical studies.

The GSAs are also actively pursuing state, federal, and other external funding opportunities to support implementation of PMAs and future GDM efforts. Maximizing grant funding and cost-sharing opportunities is intended to minimize financial burdens on local groundwater users while accelerating implementation of projects that improve groundwater conditions. Funding efforts may include pursuit of SGMA implementation grants, recharge-related funding programs, conservation incentives, infrastructure funding, and other available resources.

2.2.3 Continue to Support and Coordinate Voluntary Landowner Efforts

Action 0 emphasizes collaboration with landowners and groundwater users who are interested in implementing measures that reduce groundwater demand or improve groundwater conditions. The GSAs will continue to coordinate with voluntary efforts and seek opportunities to recognize, support, and potentially expand successful activities throughout the Subbasin. Examples of voluntary actions that may contribute toward groundwater sustainability include:

- Groundwater recharge and recharge partnerships

- In-lieu use of available surface water supplies
- Irrigation efficiency improvements and conservation measures that reduce non-beneficial consumptive use of groundwater
- Temporary or long-term land fallowing
- Crop shifting to less water-intensive production
- Land repurposing programs
- Water transfers and other water management strategies
- Other activities that reduce groundwater demand or enhance aquifer replenishment

By encouraging locally driven solutions and voluntary participation, the Subbasin can make progress toward sustainability while maintaining flexibility for individual landowners and farming operations.

2.2.4 Continue GDM Outreach and Education

A key objective of Action 0 is to establish a comprehensive outreach and education program to improve understanding of groundwater sustainability challenges and potential management approaches. Outreach activities will provide landowners, groundwater users, and other stakeholders with information regarding:

- Water accounting statement development and interpretation
- Groundwater accounting concepts and methodologies
- NGWI metrics and related concepts
- Groundwater conditions and sustainability indicators
- Trigger thresholds and the associated action framework
- Existing PMA implementation efforts
- Available incentive programs and funding opportunities

The outreach program is intended to foster transparency, build stakeholder familiarity with groundwater management tools, and provide opportunities for feedback before more significant management measures are considered. As part of the outreach program, in collaboration with the Glenn County Resource Conservation District and the Community Alliance of Family Farmers, each GSA hosted one "SGMA 201" Workshop for Landowners in September 2026 where the GDM Program and WAS were introduced and the public was given an opportunity to engage with the development of the GDM Program. Additional focused workshops were hosted in November and December of 2026. These workshops are further described in **Section 5.1**.

2.2.5 Identify Future Administrative, Technical, and Funding Needs

Action 0 also serves as the planning and readiness phase for future management actions. During this period, the GSAs will identify the administrative, legal, technical, staffing, financial, and data requirements needed to support implementation of higher action levels should future trigger exceedances occur. Areas of evaluation may include:

- Monitoring and reporting requirements

- Data management systems
- Staffing and consultant support needs
- Legal authorities and procedural requirements
- Funding mechanisms and program costs
- Compliance and enforcement considerations
- Allocation methodologies
- Potential fee structures and cost recovery approaches

Developing a clear understanding of these needs during Action 0 will improve the Subbasin's ability to respond efficiently and effectively if trigger conditions worsen.

2.2.6 Develop Contingency Groundwater Fee and Allocation Frameworks

The GSAs will evaluate, develop, and document potential fee methodologies and allocation concepts during Action 0. These efforts are intended solely as planning and contingency measures and do not constitute immediate implementation of fees, allocations, or mandatory demand reduction requirements. Developing these tools during Action 0 provides the opportunity to evaluate methodologies, identify data requirements, assess administrative feasibility, and engage stakeholders regarding potential future approaches. By completing this work in advance, the Subbasin can avoid delays and provide greater certainty regarding future actions if Action 2 or Action 3 trigger levels are reached.

Importantly, preparation of allocation and fee concepts during Action 0 does not predetermine future implementation. Any decision to advance beyond voluntary and incentive-based actions would remain subject to the trigger framework, GSA / Board decision-making processes, stakeholder engagement, and applicable legal requirements.

2.2.6.1 Develop Groundwater Fees

During Action 0, the GSAs will evaluate groundwater fee structures that could be considered as a future GDM tool. The purpose of this effort is to assess feasibility and develop implementation-ready options, not to establish or impose fees during Action 0. This evaluation may include technical and economic analyses of potential fee structures, including assessments of how various fee approaches could influence groundwater demand, support program administration, provide funding for groundwater sustainability efforts, or incentivize desired management outcomes. Analyses may also evaluate potential economic impacts, implementation costs, equity considerations, and administrative requirements.

In parallel, the GSAs will evaluate applicable legal frameworks associated with groundwater management fees. This evaluation will help identify procedural requirements, limitations, and considerations that would need to be addressed should future trigger conditions warrant consideration of groundwater fees. Through development of this groundwater fee framework during Action 0, the Subbasin will improve preparedness, maintain flexibility, and ensure that future management tools are technically defensible, legally evaluated, and informed by stakeholder engagement before any implementation decisions are made.

2.2.6.2 Develop Allocation Program

During Action 0, the GSAs will evaluate and develop a groundwater allocation framework that would be implemented if future trigger exceedances necessitate implementation of mandatory GDM measures. This effort will focus on defining the technical and administrative components of an allocation program while allowing time for stakeholder review and refinement. Program development may include, but is not limited to, evaluation of:

- Allocation methodologies and the basis for determining available groundwater supplies, including consideration of sustainable yield, transitional water supplies, and other groundwater management objectives.
- Mechanisms for recognizing precipitation-based reductions in groundwater demand, recharge activities, and other actions that contribute to groundwater sustainability through tools such as precipitation credits and recharge credits.
- Carryover provisions that allow unused allocations to be retained for future use, subject to program objectives and sustainability considerations.
- Groundwater allocation transfer or trading provisions that could provide flexibility while maintaining overall groundwater demand reduction objectives.
- Procedures for calculating, updating, and communicating individual allocation amounts.

The GSAs have already started tracking groundwater consumptive use and NGWI using publicly available remotely sensed ET datasets. The GSA Boards also recommended that, if mandatory measures are necessary, certified totalizing flowmeters would be another option available to landowners for water accounting purposes. Evaluation of measurement approaches moving forward will continue to consider accuracy, administrative feasibility, implementation costs, and consistency with GDM Program objectives.

In addition, Action 0 planning efforts will define compliance, enforcement, and administrative procedures that would support an allocation program, if triggers are met. These evaluations would include development of draft compliance timelines, reporting requirements, appeals processes, enforcement mechanisms, and penalty structures intended to ensure equitable and transparent program administration if implementation becomes necessary.

The GSAs will continue providing water accounting statements to landowners. These statements will help users understand the relationship between calculated groundwater consumptive use, NGWI metrics, and groundwater sustainability objectives. Once a sustainable yield basis is established, future reporting may also include information comparing a landowner's calculated NGWI to sustainability-based groundwater management targets, helping stakeholders understand future program implications before any mandatory actions are considered.

2.3 Trigger and Action 1

Action 1 represents the first response level within the GDM Program framework and is initiated when monitoring results indicate that groundwater conditions are beginning to approach SMC thresholds. Action 1 will be carried out in response to Trigger 1, which is met when any one of the following conditions occurs:

- **Groundwater Levels/Storage:** 12.5 percent (6) of Representative Monitoring Site (RMS) wells reach the early warning groundwater level threshold [50 percent of the distance between the Minimum Threshold (MT) and Measurable Objective (MO)] for two consecutive fall measurements.
- **Cumulative Subsidence:** Greater than 0.5 feet (FT) of cumulative subsidence, measured since January 2024, occurs in three **contiguous** one-square-mile sections located within one mile of critical infrastructure.
- **Annual Subsidence:** Greater than 0.10 FT per year of subsidence occurs at six contiguous one-square-mile sections for two consecutive years. The response to this trigger is the same under Actions 1, 2, and 3 (**Figure 3**): continued GDM outreach and education, with a specific focus on areas experiencing more than 0.10 FT per year of subsidence.

The purpose of Trigger 1 is to provide an early warning signal that groundwater conditions may be moving toward undesirable results and that additional efforts are warranted to encourage voluntary action before more substantial management responses become necessary. Trigger 1 is intentionally set at a level that allows the Subbasin to respond proactively while maintaining flexibility and local control. Action 1 does not include implementation of mandatory allocations, groundwater fees, or pumping restrictions. Instead, it is intended to improve understanding of groundwater use patterns, communicate the implications of continued trends, and motivate voluntary responses that may avoid the need for more restrictive measures in the future.

The allocation concepts and groundwater fee methodologies developed during Action 0 will continue to serve as planning and educational tools during Action 1. These tools may be used to demonstrate how future management approaches could function if conditions continue to deteriorate, allowing stakeholders to better understand potential consequences and provide feedback before implementation of any mandatory measures is considered. Through expanded outreach, improved understanding of groundwater accounting results, and promotion of voluntary demand reduction strategies, Action 1 seeks to create sufficient behavioral and management changes to improve conditions while maintaining the Subbasin's preference for locally driven and incentive-based solutions.

Action 1 builds directly on Action 0, and many of the same foundational concepts, tools, and ongoing activities apply at both action levels. The primary difference is that Action 1 adds more strategic discussions of Action 2 and of groundwater fees should conditions continue to worsen.

2.4 Trigger and Action 2

For the groundwater levels/storage and cumulative subsidence triggers, Action 2 is when the Subbasin begins implementing groundwater fees and prepares the administrative structure needed for potential Action 3. For the annual subsidence trigger, Action 2 remains focused on continued GDM outreach and education (see **Section 2.3** above):

- **Groundwater Levels/Storage:** 12.5 percent (6) of RMS wells reach 75 percent of the distance between the MT and MO for two consecutive fall measurements.

- **Cumulative Subsidence:** Greater than 1.0 FT of cumulative subsidence, measured since January 2024, occurs in two contiguous one-square-mile sections located within one mile of critical infrastructure.
- **Annual Subsidence:** Greater than 0.10 FT per year of subsidence occurs at eight contiguous one-square-mile sections for two consecutive years. The response to this trigger is the same under Actions 1, 2, and 3: continued GDM outreach and education, with a specific focus on areas experiencing more than 0.10 FT per year of subsidence.

The purpose of Trigger 2 is to indicate that voluntary actions and outreach efforts alone may not be sufficient to address emerging groundwater sustainability concerns. Trigger 2 serves as a warning that conditions are continuing to move toward undesirable results despite implementation of baseline and early-warning actions. As a result, the Subbasin begins transitioning from planning and voluntary measures toward an adaptive mandatory management approach, with the response tailored to the condition that was exceeded.

Action 2 is intended to strengthen the Subbasin's ability to respond effectively if groundwater conditions continue to deteriorate while still providing landowners and groundwater users the opportunity to adjust management practices before mandatory allocation requirements are imposed. The emphasis of Action 2 is on implementing funding mechanisms, supporting continued voluntary groundwater demand reduction efforts, and preparing the administrative, technical, and policy framework needed for potential Action 3 implementation. Action 2 seeks to create the financial and institutional capacity necessary to respond effectively before conditions reach levels requiring mandatory demand reduction measures. Funding generated through Action 2 could support ongoing GDM Program administration; continued development and maintenance of the WAS; monitoring, technical analyses, data management, and reporting; outreach, stakeholder engagement, and technical assistance; incentive-based conservation, fallowing, in-lieu and direct recharge, and other demand reduction programs; and technical, legal, and administrative preparations for possible Action 3 implementation.

2.4.1 Implement Groundwater Management Fees

During Action 2, the GSAs would consider implementation of NGWI-based fees, groundwater extraction fees, consumption-based fees, acreage-based fees, or similar funding mechanisms, provided such actions are adopted through the appropriate legal pathway and comply with all applicable statutory requirements. Any fee structure considered during Action 2 would be based on the technical, economic, legal, and administrative evaluations completed during Action 0 and refined during Action 1. The objective of these fees is not to be punitive, but rather to provide a stable funding source for groundwater sustainability activities and ensure that the Subbasin has the resources necessary to continue implementation of GDM actions.

Funding generated through Action 2 may be used to support ongoing and future groundwater sustainability efforts, including, but not limited to:

- GDM Program administration
- Continued development and maintenance of the WAS

- Monitoring and technical analyses
- Outreach and stakeholder engagement activities
- Technical assistance for landowners and groundwater users
- Incentivize based conservation, fallowing, in-lieu and direct recharge, and other demand reduction programs
- Data management and reporting systems
- Preparation for possible Action 3 implementation
- Legal, technical, and administrative support necessary to implement future management actions

Implementing a funding mechanism during Action 2 provides the Subbasin with resources needed to proactively address groundwater sustainability concerns while reducing reliance on uncertain grant funding sources. Implementation of any fee would be subject to applicable legal requirements, including any public process, notice, hearing, voter approval, or property-owner approval requirements that may apply.

2.4.2 Continue Outreach with a Focus on Potential Action 3 Implementation

Outreach and education efforts will continue during Action 2, with increasing emphasis on helping stakeholders understand how mandatory GDM tools could function if Trigger 3 is reached. Topics discussed during Action 2 may include details developed during Action 0, such as:

- Fee structures, funding mechanisms, and uses of fee revenue
- Potential groundwater allocation methodologies
- Sustainable yield concepts
- Transitional water provisions
- Recharge and precipitation credits
- Carryover provisions
- Measurement and reporting requirements
- Potential compliance obligations
- Penalty structures and enforcement concepts
- Water transfer, exchange, or trading mechanisms
- Administrative procedures associated with allocation implementation

The objective of these outreach efforts is to increase transparency, gather stakeholder feedback, and ensure that landowners and groundwater users have a clear understanding of future allocation management approaches before they are considered for implementation.

2.4.3 Refine Allocation Program Framework

During Action 2, the GSAs will continue refining the allocation program framework developed during Action 0 as needed. While allocations are not implemented during Action 2, the program framework should be sufficiently developed so that it can be implemented efficiently if future trigger exceedances require Action 3 measures. Program refinement may include:

- Finalizing allocation calculation methodologies
- Updating sustainable yield and groundwater budget assumptions
- Refining recharge, precipitation, and carryover credit mechanisms
- Evaluating allocation transfer or trading provisions
- Confirming measurement and reporting requirements
- Developing compliance and appeals procedures
- Testing administrative workflows and data systems
- Updating stakeholder guidance documents and educational materials

This work helps ensure that any future allocation program is technically defensible, administratively feasible, transparent, and informed by stakeholder input.

2.5 Trigger and Action 3

Action 3 represents the most robust adaptive management response available within the GDM framework and is intended to be implemented when monitoring results indicate that undesirable results are occurring. The specific Action 3 responses are described in this section and depend on which of the following trigger condition is met:

- **Groundwater Levels/Storage**: 12.5 percent (6) of RMS wells fall below the MT for two consecutive fall measurements.
- **Cumulative Subsidence**: Greater than 2.0 FT of cumulative subsidence, measured since January 2024, occurs within any one-square-mile section.
- **Annual Subsidence:** Greater than 0.10 FT per year of subsidence occurs at ten contiguous one-square-mile sections for two consecutive years. The response to this trigger is the same under Actions 1, 2, and 3: continued GDM outreach and education, with a specific focus on areas experiencing more than 0.10 FT per year of subsidence.

Trigger 3 indicates that groundwater conditions have reached a level where enforceable groundwater demand reduction measures may be needed to prevent continued undesirable results and support long-term sustainability. At this stage, voluntary actions, expanded outreach, and funding mechanisms alone would not been sufficient to address the severity or extent of groundwater level decline or subsidence.

Action 3 provides a locally developed response pathway that allows the GSAs to implement GDM measures through their own governance processes rather than relying on potential intervention by the State Water Resources Control Board (SWRCB). The action level is intended to build on the tools developed during Actions 0 through 2 and move from planning and preparation to implementation of mandatory measures, where warranted.

Under Action 3, the GSAs would implement a groundwater allocation program, groundwater use limits, NGWI-based requirements, or other enforceable demand reduction measures. The specific approach will be developed under Action 0 and will be supported by the technical analyses, water accounting information, stakeholder engagement, funding mechanisms, and administrative procedures developed during the earlier action levels. Because the allocation methodologies, reporting systems, compliance

procedures, fee structures, and administrative processes would already have been developed and refined, Action 3 is intended to allow the Subbasin to transition to mandatory management actions in a more orderly, transparent, and predictable manner.

The groundwater allocation program components may include sustainable yield-based allocations, transitional water provisions, carryover provisions and penalties, water markets, and other related policies adopted by the GSAs. The GSAs would implement any mandatory measures in accordance with applicable legal authorities, adopted regulations, GSA governance processes, public noticing requirements, and opportunities for stakeholder review. The allocation program may also establish procedures for updating allocations and the measurement or accounting requirements needed for administration.

The GSAs may also implement compliance and enforcement procedures to ensure that adopted demand reduction measures are applied consistently and effectively. These procedures may include groundwater extraction reporting, approved measurement or accounting methods, verification and auditing, compliance timelines, appeals, penalties, administrative review, and enforcement. The GSAs would administer these measures through a fair, transparent, and consistently applied framework designed to reduce groundwater demand while maintaining local control and providing clear expectations for groundwater users.

During Action 3, the GSAs would continue monitoring groundwater conditions to evaluate whether the implemented measures are stabilizing groundwater levels and reducing the risk of undesirable results. Consistent with SGMA's adaptive management principles, the GSAs may refine, continue, suspend, or de-escalate the measures based on monitoring results, stakeholder input, technical analyses, and changing groundwater conditions.

3 Monitoring Approaches

The GDM Program will be evaluated annually using a water year-based monitoring and reporting process that is integrated with preparation of the Subbasin Annual Reports that occur for SGMA compliance. Groundwater level and subsidence data will be reviewed each year to determine whether any GDM trigger thresholds have been exceeded and whether corresponding management actions should be considered. This annual evaluation process provides a consistent, transparent, and repeatable framework for assessing groundwater conditions, communicating results to stakeholders, and supporting GSA decision-making.

The CGA and GGA will utilize the monitoring networks, datasets, and SMC established in the GSP to evaluate groundwater conditions relative to the GDM trigger framework. Trigger evaluations will be conducted on an annual basis and will be included as an appendix to the Annual Report. Charts and tables for each RMS station comparing observed subsidence and groundwater levels to trigger thresholds will be presented. If no triggers are exceeded, the RMS stations will be reevaluated during the next Annual Report cycle. If triggers are exceeded, a list of next steps will be provided as well as a timeline for action.

3.1 Groundwater Levels and Storage

Groundwater level and storage triggers will be evaluated using the RMS well network established in the 2027 GSP (see Section 4.2.1 and Figure 4-7 in the 2027 GSP). Water level data collected by DWR and other approved monitoring programs will be reviewed annually following completion of fall groundwater level measurements, which represent seasonal low groundwater conditions within the Subbasin.

For each RMS well, observed groundwater elevations will be compared to the applicable MO, Trigger 1 threshold, Trigger 2 threshold, and MT. Trigger evaluations will focus on the percentage of RMS wells meeting or exceeding the applicable trigger criteria for two consecutive fall measurement events, consistent with the trigger framework described in **Section 2**. Because groundwater storage is assessed using groundwater levels as a proxy, the groundwater level monitoring network and associated trigger calculations will also serve as the basis for groundwater storage evaluations. Annual summaries will identify the number and percentage of RMS wells within each trigger category and document any changes relative to the previous water years.

3.2 Land Subsidence

Land subsidence triggers will be evaluated annually following the close of each water year and documented through the Subbasin Annual Report process. Section 4.2.3 of the 2027 GSP describes the Subbasin's subsidence monitoring program. The associated monitoring network and critical infrastructure are shown in Figures 4-7 and 5-1 of the 2027 GSP, respectively. The evaluation will rely primarily on DWR-provided Interferometric Synthetic Aperture Radar (InSAR) datasets used for SGMA implementation and compliance, with benchmark surveys, extensometers, and continuous GPS/GNSS stations used as supplemental information where helpful for interpreting results.

DWR-provided InSAR data will be used to assess vertical land displacement across the Subbasin. The Annual Report appendix will identify the InSAR dataset used for each annual evaluation, including the period of record and processing date if available. Because the reported probable error for InSAR subsidence values is approximately ±0.06 FT, results will be reviewed with consideration of data uncertainty, localized anomalies, and consistency with supplemental monitoring information.

For cumulative subsidence triggers, displacement will be calculated relative to the January 2024 baseline established in the 2024 GSP. For annual subsidence triggers, annual rates of subsidence will be calculated for the most recent water year and compared with the applicable trigger thresholds, including the requirement that annual-rate triggers be met for two consecutive years. Subsidence values will be evaluated by Public Land Survey System (PLSS) section, as described in the 2027 GSP, using spatial averaging to reduce sensitivity to isolated pixels or localized anomalies. The evaluation will identify whether the applicable number of contiguous PLSS sections exceeds the cumulative or annual-rate trigger criteria and, where required by the trigger definition, whether affected sections are within the specified distance of critical infrastructure.

The Annual Report will summarize cumulative subsidence since January 2024, annual subsidence rates for the most recent water year, PLSS section averaging results, critical infrastructure proximity findings, and any uncertainty or data-quality considerations relevant to the trigger determination. If no subsidence triggers are exceeded, monitoring will continue through the next water year. If one or more triggers are exceeded, the Annual Report will identify the applicable trigger level, summarize supporting evidence, and outline recommended next steps and anticipated timing for GSA consideration.

4 Program Implementation Timeline, Management, and Funding

4.1 Annual Evaluation and Implementation

The GDM Program will be implemented through an annual evaluation and decision-making process that is coordinated with preparation of the Subbasin Annual Report, consideration by the CGA and GGA Boards, stakeholder outreach activities, and future GSP updates. This process is intended to provide a transparent and consistent framework for evaluating groundwater conditions, determining whether trigger thresholds have been exceeded, and implementing corresponding management actions.

4.1.1 Annual Trigger Evaluation Schedule

Leading up to and at the completion of each water year, the GSAs will compile and review groundwater level, groundwater storage, and land subsidence monitoring data. Trigger evaluations will be conducted after fall groundwater level measurements become available and after DWR releases the InSAR data necessary to calculate annual and cumulative subsidence conditions for the reporting period.
The annual evaluation process is anticipated to generally occur as follows:

- **August through November:**
  - Collection and review of fall groundwater level measurements representing seasonal low groundwater conditions. DWR-released InSAR datasets for the recently completed water year are also reviewed as they become available (anticipated annually in October).
  - Compilation and analysis of groundwater level, groundwater storage, and subsidence datasets; calculation of groundwater level and subsidence trigger metrics; preparation of maps, tables, and supporting technical documentation for inclusion in the Annual Report.

- **November through December:**
  - Prepare and internally review the Annual Report data sets, including review of trigger evaluation results by technical staff and the GSAs. Identify any Trigger 1, Trigger 2, or Trigger 3 exceedances and notify the GSA Boards for consideration. If monitoring indicates that a trigger threshold is likely to be exceeded, begin public discussions during January or February, before Annual Report submission, to explain the emerging findings and potential corresponding GDM actions.

- **January through February:**
  - Ahead of Annual Report submission, the Joint Boards will communicate monitoring results and any corresponding GDM actions to the public and other interested parties.

- **April:**
  - Submit the Annual Report to DWR, including the annual GDM trigger evaluation and supporting monitoring results.

Actual timing may vary based on data availability, Annual Report schedules, Board meeting calendars, and DWR release of monitoring datasets.

4.1.2 Review and Decision-Making Process

Annual trigger evaluation results will be presented to the CGA and GGA Boards for consideration. The Boards will review monitoring results, trigger determinations, technical analyses, stakeholder input, and applicable legal or financial considerations before determining whether corresponding GDM actions should be implemented. Board actions may include continuation of existing measures, initiation of new actions, authorization of technical studies, implementation of outreach activities, initiation of funding mechanisms, or consideration of mandatory demand reduction measures consistent with the trigger framework described in Section 2.

4.1.3 Trigger Notification and Public Communication

If annual evaluations indicate that a trigger threshold has been exceeded, the GSAs will communicate findings through the Annual Report process, Board meetings, websites, outreach materials, and other stakeholder engagement activities as appropriate.

4.1.4 Action Implementation Timelines

If a trigger is exceeded and a new action is to be initiated, then the action should be initiated prior to the growing season in the following year. For example, if a trigger is surpassed in WY2026, the corresponding action will be initiated by April 2027. The GSAs may phase implementation of individual actions to allow adequate stakeholder engagement, administrative preparation, funding development, and coordination between participating GSAs.

4.1.5 Adaptive Management and Future Program Updates

The GDM Program is intended to function as a living implementation document and may be refined over time as new monitoring information, technical analyses, stakeholder input, regulatory requirements, and implementation experience become available. Trigger evaluations, management actions, implementation procedures, and supporting documentation may be updated through future Board actions, Annual Reports, GSP updates, or Periodic Evaluations, as appropriate. The GSAs may also evaluate opportunities to de-escalate, suspend, or modify actions if monitoring results demonstrate sustained improvement in groundwater conditions and reduced risk of undesirable results related to groundwater levels. Specifically, if groundwater levels return above their trigger, the Boards will discuss potential de-escalation. Any such decisions will be subject to Board consideration and supported by available technical information.

4.2 Feedback and Review

The GDM Program will be administered collaboratively by the CGA and GGA and will be reviewed and refined over time as new monitoring information and stakeholder feedback become available. Consistent with the adaptive management principles of SGMA, the GDM Program is intended to function as a living implementation framework that can be updated as groundwater conditions, management priorities, and available tools evolve.

4.2.1 Roles and Responsibilities

Implementation of the GDM Program will involve coordinated participation by the CGA, GGA, technical consultants, legal counsel, landowners, and other stakeholders.

- The CGA and GGA are responsible for implementing groundwater sustainability activities within their respective jurisdictions, including monitoring groundwater conditions, evaluating trigger exceedances, conducting outreach, administering adopted GDM measures (including fees and allocations), and coordinating Annual Report and GSP update activities.

- The GSA Boards provide policy direction and decision-making authority regarding implementation, modification, escalation, or de-escalation of GDM actions. The Boards are responsible for reviewing monitoring results, conducting required public processes, and adopting any future fees, allocations, ordinances, or other management measures.

- Technical staff and consultants assist with groundwater monitoring, water accounting, data management, technical analyses, Annual Reports, economic evaluations, allocation development, and other activities necessary to support implementation of the GDM Program.

- Legal counsel provides guidance regarding SGMA authorities, fee implementation, allocation programs, enforcement mechanisms, due process requirements, fee mechanism considerations, and other legal matters associated with GDM Program implementation.

- Landowners, groundwater users, and other stakeholders play an important role in GDM Program development and implementation by participating in outreach activities, providing feedback on proposed measures, reviewing water accounting statements, and participating in voluntary or mandatory management actions as applicable.

4.2.2 Program Administration

Administration of the GDM Program may require staffing, consultant support, data management systems, recordkeeping procedures, and other resources necessary to support implementation of current and future actions. GDM Program administration activities may include:

- Groundwater and subsidence monitoring
- WAS administration and maintenance
- Data management, quality control, and reporting
- Preparation of Annual Reports and supporting technical documentation
- Public outreach and stakeholder engagement
- Fee administration and billing, if adopted
- Allocation administration, if adopted
- Compliance tracking and recordkeeping
- Appeals, enforcement, and administrative review procedures, if implemented

The level of administrative effort required will depend on the action level being implemented and the specific measures authorized by the GSAs.

4.2.3 Annual Review and Program Updates

GDM Program performance will be reviewed annually as part of the groundwater monitoring and Annual Report process. Annual reviews may consider groundwater conditions, trigger exceedances, implementation progress, stakeholder feedback, funding needs, administrative effectiveness, and opportunities for GDM Program improvement.

The GDM Program will also be evaluated during future GSP updates and Periodic Evaluations required under SGMA. These evaluations may consider whether modifications to trigger thresholds, monitoring approaches, management actions, allocation methodologies, fee structures, implementation procedures, or outreach strategies are warranted based on updated information and implementation experience. Any substantive revisions to the GDM Program will be subject to review and approval by the applicable GSA Boards and may be incorporated into future GSP amendments, Annual Reports, Board actions, or other implementation documents, as appropriate.

4.2.4 Transparency and Legal Defensibility

The GDM Program was developed in a transparent process, which included five public meetings over three months in 2026. The GSAs also held several public forums and adoption of the GDM Program was in a noticed meeting after a lengthy public comment process. The foundation of the GDM Program is rigorous technical information and legal review. Implementation of the GDM Program will also be transparent and be based on public disclosure and invitation of stakeholder feedback. Monitoring results, trigger evaluations, technical analyses, and Board actions will be documented through Annual Reports, public meetings, supporting technical memoranda, and other publicly available materials.

The GDM Program is a framework that provides a structure for developing GDM actions; the GDM Program itself does not adopt any fee, allocation, or other GDM action. As those future potential actions are developed, each GSA will prepare additional technical, economic, legal, or administrative documentation as necessary to support decision-making and compliance with applicable laws and regulations. Such documentation may include evaluation of groundwater supplies, water demands, conservation measures, surface water application, hydrologic information, economic evaluations, technical data related to sustainability indicators, cost-of-service studies, allocation evaluations, technical memoranda, stakeholder outreach records, and other supporting information.

Any future implementation of fees, allocations, enforcement mechanisms, or mandatory demand reduction requirements will be subject to applicable public process requirements, Board consideration, stakeholder engagement, and legal review. The GSAs intend to provide transparency and opportunities for public participation throughout development and implementation of future GDM measures.

4.3 Funding and Financing

The GSAs are responsible for developing and implementing programs and measures within their respective jurisdictions. Funding and financing of individual GSA efforts is the responsibility of the individual GSAs. GSA funding and financing is expected to come from one, or a combination, of the following sources:

- Reserve fund
- GSA fees and assessment
- Funds generated through implementation of other PMAs (e.g., fines and/or penalties)
- County, state, and/or federal funding, as available
- Other sources, as identified

5 Public Outreach and Engagement

Public outreach and engagement support understanding, transparency, trust, and participation in the GDM Program. The GSAs have prioritized sharing water accounting information early, explaining the relationship between the WAS and potential GDM measures, and providing opportunities for stakeholder input before water accounting information is used to support financial, regulatory, or mandatory management actions. This section summarizes completed outreach and the initial feedback process, followed by potential future outreach and program refinement.

5.1 Completed Outreach and Initial Feedback

GDM Program development has included public participation through CGA and GGA Board meetings and technical discussions. Board meetings in 2025 and 2026 that resulted in decisions regarding GDM Program development were open to the public, and interested parties attended and provided public comment.

The GSAs conducted two public workshops in September 2026 to introduce the GDM Program and WAS and solicit input, comments, and concerns about the proposed program. The workshops explained potential future management actions and gave landowners an opportunity to review draft water accounting statements, ask questions about parcel-scale water budgets and accounting methods, and provide input that will be used to refine the program. Recordings are available for the Colusa Subbasin SGMA 201 meetings held in Williams on September 2, 2026, and Orland on September 3, 2026. Outreach videos developed include the Glenn Groundwater Authority SGMA Update (2026) and the Water Accounting Statement Explainer – Net Groundwater Impacts (NGWI). On November 16, 2026, each GSA held an additional in-person workshop, supplemented by a third online workshop on December 2, 2026, targeting landowners that represented 90% of the negative NGWI in the Subbasin. Postcards were sent to these landowners to notify them of the workshops. The Colusa Subbasin Groundwater Sustainability Plan Implementation video was developed for these outreach events. Initial landowner feedback has largely focused on apparent discrepancies in parcel boundaries and crop classifications. This input has helped guide refinements to the water accounting approach that will be applied in future statements.

5.2 Future Outreach and Program Refinement

Additional future outreach could include direct communication, public meetings, updated guidance, surveys, and recorded presentations tailored to stakeholder needs. As monitoring results and proposed GDM measures evolve, the GSAs could explain their implications, gather input before implementation decisions, and coordinate with neighboring GSAs or infrastructure operators where regional impacts are possible. Public notice would follow applicable requirements, and feedback could inform subsequent program updates and further outreach priorities.

6 Appendix

6.1 Appendix A. Water Accounting System Overview Flyer

6.2 Appendix B: Example Water Accounting Statement

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SGMA AND GDM OUTREACH SUPPORT MANUAL

Groundwater Sustainability Plan Implementation Support

DRAFT

Prepared By

DAVIDS ENGINEERING, INC

November 2026

SGMA AND GDM OUTREACH SUPPORT MANUAL

Groundwater Sustainability Plan Implementation Support

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Abbreviations

CGA	Colusa Groundwater Authority
DWR	California Department of Water Resources
FAQ	Frequently Asked Questions
GDM	Groundwater Demand Management
GGA	Glenn Groundwater Authority
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
NGWI	Net Groundwater Impact
SGMA	Sustainable Groundwater Management Act
WAS	Water Accounting System

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1 Purpose, Audience, Staff, and Agency Representatives Role

1.1 Purpose

This manual equips Groundwater Sustainability Agency (GSA) staff, Board of Supervisors (Board) members, and outreach partners to communicate consistently about Sustainable Groundwater Management Act (SGMA) implementation, Colusa Subbasin conditions, the Groundwater Demand Management (GDM) Program, the Water Accounting System (WAS), Net Groundwater Impact (NGWI), water accounting statements, and related data and resources.

1.2 Intended Users

- GSA staff, Board members, and agency representatives
- Outreach partners and meeting facilitators
- Staff and agency representatives responding to telephone, email, or in-person questions
- Staff and agency representatives supporting workshops, community meetings, and stakeholder briefings

1.3 Responsibilities of those Doing Outreach for the Colusa Subbasin

- Provide consistent information using current guidance materials
- Explain technical concepts in plain language without changing their meaning
- Be clear about which program details have been adopted, which are still in draft form, and which are potential future actions
- Help stakeholders locate, review, and understand available materials
- Encourage questions, feedback, and explain how feedback will be used to improve information
- Avoid account-specific (e.g., landowner) determinations, legal interpretations, water-right opinions, or commitments about future policy
- Document questions that require technical, policy, legal, or account-specific follow-up. These can be routed to the appropriate GSA staff contact, who can reach out to a legal or technical consultant, as appropriate

Staff and agency representatives should refer to guidance materials to explain information clearly. Staff and agency representatives should not create a new policy interpretation or determine how a future program may apply to a specific property.

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1.4 Communication Principles

Principle	Practical Application
Be clear	Begin with a short response, define necessary acronyms, and use plain language.
Be accurate	Use the guidance materials, guide the conversation, and support consistent messaging.
Be consistent	Reinforce the core key messages across conversations and events.
Be transparent	Explain what is known, what remains under development, and where review is needed.
Be responsive	Invite questions, capture feedback, and explain the follow-up path.
Stay within scope	Refer legal, policy, account-specific, and unresolved technical questions to GSA staff or appropriate consultant, rather than speculating.

2 How to Use This Manual

Identify the topic
Determine whether the question concerns SGMA, local GSA roles, GDM, WAS, NGWI, a statement, data, feedback, or policy.

Start with the talking points and FAQ
Use the Quick-Response Talking Points (pages 5 and 6) or Colusa Subbasin FAQ (Appendix A-1) as guidance for conversations.

Select the supporting material
Use the Material Selection and Use Guide (pages 9 and 10) to identify the appropriate reference.

Invite feedback
Direct the stakeholder to the feedback form, other current feedback method, or designated GSA contact.

Escalate when needed
Record and refer legal, policy, water-right, account-specific, enforcement, fee, allocation, media, or unresolved technical questions to GSA staff, who can reach out to legal or technical consultants, as needed.

Refrain from using acronyms
Not everyone knows acronyms or understands them. Whenever possible, try to speak plainly.

Refrain from deviating from guidance materials and key messages.
Consistent messaging will help improve stakeholder understanding and build trust.

Use the guide below to match questions with the best starting resource and supporting materials.

Potential Questions	Starting Resource	Supporting Materials
General SGMA background	SGMA 201 Presentation (Appendix A-4)	Current (2024 or 2027) GSP
Local GSA boundaries or roles	CGA/GGA Overview Map (Appendix A-5)	SGMA 201 Presentation (Appendix A-4)
GDM purpose, status, triggers, or actions	GDM Program Roadmap Flyer (Appendix A-2)	Colusa Subbasin FAQ (Appendix A-1)and SGMA 201 Presentation (Appendix A-4)
WAS, NGWI, or a statement	Colusa Subbasin FAQ (Appendix A-1)	Example Statements (Appendix A-6) and WAS Explainer Video (Appendix A-7)
Potential data correction	Feedback Form (Appendix A-8)	Colusa Subbasin FAQ (Appendix A-1) and the landowner's statement
Legal, water-right, enforcement, fee, allocation, or account-specific policy	Refrain from deviating from guidance materials to support consistent messaging.	Refer to the Escalation and Follow-Up section (page 5)

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3 Core Messages

Groundwater management is locally led.
The Sustainable Groundwater Management Act (SGMA) establishes California's statewide framework for sustainable groundwater management. The Colusa Groundwater Authority (CGA) and Glenn Groundwater Authority (GGA) are the local Groundwater Sustainability Agencies (GSAs) jointly responsible for managing the Colusa Subbasin.

The Groundwater Demand Management (GDM) Program is being developed to respond to changing conditions.
The Groundwater Demand Management (GDM) Program is being developed to support sustainable groundwater management and address groundwater overdraft, groundwater-level declines, subsidence, and related undesirable results.

The GDM Program uses adaptive management.
The current framework uses groundwater conditions and defined triggers to determine when additional actions would be needed.

Water accounting supports transparency.
The Water Accounting System (WAS) provides consistent information about water inflows, water outflows, and estimated Net Groundwater Impact (NGWI). Statements allow landowners to review the best available information associated with their land.

Current statements are informational.
The draft water accounting statement is for information and review. It does not itself establish an allocation, credit, penalty, fee, or regulatory requirement, and no immediate action is required.

Feedback matters.
Landowner feedback is important particularly when applied surface water information, account or parcel relationships, or contact information appear incomplete or inaccurate.

Draft concepts must be identified as draft.
Always distinguish adopted program details, draft concepts, and potential future actions.

4 Quick-Response Talking Points

Question/ Scenario	Key Talking Point	Emphasis/Consideration	Use
What is the Sustainable Groundwater Management Act (SGMA)?	The Sustainable Groundwater Management Act (SGMA) is California's statewide framework for sustainable groundwater management.	Local implementation occurs within a statewide framework.	SGMA 201 Presentation (Appendix A-4)
Who manages groundwater locally?	Colusa Groundwater Authority (CGA) and Glenn Groundwater Authority (GGA) are the local Groundwater Sustainability Agencies (GSAs) jointly managing the Colusa Subbasin.	Use maps to orient the stakeholder.	CGA/GGA Overview Maps (Appendix A-5); SGMA 201 Presentation (Appendix A-4)
What is the Groundwater Demand Management (GDM) Program?	The Groundwater Demand Management (GDM) Program is being developed to support sustainable groundwater management and respond to changing conditions.	State current program development and adopted details.	GDM Roadmap Flyer (Appendix A-2); Colusa Subbasin FAQ (Appendix A-1)
What does adaptive management mean?	Actions are evaluated and adjusted as groundwater conditions change.	Identify draft concepts as draft.	GDM Roadmap Flyer (Appendix A-2); SGMA 201 Presentation (Appendix A-4)
What is the Water Accounting System (WAS) and Net Groundwater Impact (NGWI)?	The Water Accounting System (WAS) organizes water inflow and outflow information. Net Groundwater Impact (NGWI) estimates the net effect on the groundwater system.	WAS and NGWI serve as the foundation for the GDM Program.	Colusa Subbasin FAQ (Appendix A-1); Example Statements (Appendix A-6); WAS Explainer Video (Appendix A-7)
Why did I receive a statement?	The statement is being provided so landowners can review the best available information associated with their land.	Communicate that statements are draft, informational, no immediate action required, and feedback is encouraged.	Accounting statement; Colusa Subbasin FAQ (Appendix A-1); WAS Explainer Video (Appendix A-7); Feedback Form (Appendix A-8)
Is the statement final?	No. Statements are marked draft, subject to revision, and for information only.	Confirm the current statement carries the same status.	WAS Statement; Colusa Subbasin FAQ (Appendix A-1)

Question/ Scenario	Key Talking Point	Emphasis/Consideration	Use
Is the statement a bill, fee, or allocation?	No. The current draft statement is for information and review and does not establish a fee, allocation, penalty, or regulatory requirement. However, a fee framework is in development. Fees are anticipated in Action 2, which will be implemented if and when groundwater conditions warrant it.	Refrain from deviating from guidance materials.	WAS Statement; Colusa Subbasin FAQ (Appendix A-1); GDM Flyer (Appendix A-2)
Do I need to take action?	No immediate action is required. Feedback is encouraged if information appears missing or incorrect.	Explain how to submit feedback.	Colusa Subbasin FAQ (Appendix A-1); Feedback Form (Appendix A-8)
What should a landowner review?	Applied surface water, parcel/account relationships, or contact information.	Do not limit feedback if another issue is identified	Colusa Subbasin FAQ (Appendix A-1); Feedback Form (Appendix A-8)
Can you tell me how a future policy applies to me?	I can explain adopted program details, but cannot make an account-specific or future policy determination.	Record and route the question to GSA staff, who can reach out to legal or technical consultants, as appropriate.	GDM Flyer (Appendix A-2); Escalation and Follow-Up section (page 8)
Why do totals not add exactly?	Displayed values are rounded while totals are computed using unrounded values.	Do not recalculate published values or promise a corrected statement.	Colusa Subbasin FAQ (Appendix A-1); WAS Statement
A landowner believes statement information is wrong.	The agencies are requesting feedback so information can be reviewed and improved.	Document the issue and contact information. Do not promise a change, including a revised statement.	Feedback Form (Appendix A-8); Colusa Subbasin FAQ (Appendix A-1)
How can someone submit feedback?	Use the Feedback Form (which can be accessed via the QR code), or designated GSA contact.	Verify links, QR codes, and contacts.	Feedback form (Appendix A-8); Colusa Subbasin FAQ (Appendix A-1); WAS Statement

Question/ Scenario	Key Talking Point	Emphasis/Consideration	Use
Staff or agency representatives are preparing for a community presentation.	Start by defining the audience and meeting objective. Tailor message appropriately and prepare presentation materials	Confirm versions, draft labels, links, QR codes, contacts, and accessibility.	GSA maps (Appendix A-5); SGMA 201 Presentation (Appendix A-4), GDM Flyer (Appendix A-2); Colusa Subbasin FAQ (Appendix A-1); Videos (page 12); Feedback Form (Appendix A-8)

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5 Escalation and Follow-Up

5.1 Questions Staff or Agency Representatives May Answer Using Outreach Materials

- General SGMA background and local GSA roles
- General GDM Program purpose
- General WAS and NGWI definitions
- How to read the water accounting statement
- Data sources described in the Colusa Subbasin FAQ or Example WAS Statements
- How to submit feedback and where to find program resources

5.2 Questions Staff or Agency Representatives Should Document and Refer to Legal or Technical Consultants

- Individual water-right determinations or legal interpretations
- Enforcement questions or commitments regarding future actions
- How a future fee, allocation, penalty, market, or policy would apply to a person or parcel
- Landowner-specific technical interpretation beyond the accounting statement
- Disputed ownership, account grouping, or unresolved data issues
- Technical causation questions involving groundwater levels, subsidence, or site-specific impacts
- Questions involving outdated materials

If a question cannot be answered using the outreach materials, share the general information available, be clear about what you are unsure of or is a future decision, and refer the question to the relevant GSA contact, who can reach out to the appropriate legal or technical. Refrain from deviating from guidance materials.

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6 Contacts, Version Control, and Event Checklist

6.1 Current Contacts

Role	Name / organization	Phone	Email	Last verified
CGA contact	Carol Thomas-Keefer	(650) 587-7300 x17	CThomasKeefer@rgs.ca.gov	November 2026
GGA contact	Lisa Hunter	(530) 934-6540	LHunter@countyofglenn.net	November 2026

6.2 Document and Material Control

- Maintain one source location per GSA for the manual and outreach materials
- Show a revision date or version on every frontline material
- Remove or archive superseded drafts from shared outreach folders
- Verify that the Colusa Subbasin FAQ, WAS and GDM flyers, SGMA 201 Presentation, Example WAS Statements, Videos, Feedback Form, QR codes, and contact information are synchronized
- Identify draft materials clearly and avoid distributing internal working versions

6.3 Pre-Event Checklist

☐ Define the audience and outreach objective

☐ Select only the materials needed for the audience

☐ Confirm that all materials are current

☐ Confirm draft labels and disclaimer language

☐ Test hyperlinks, QR codes, video playback, and presentation equipment

☐ Verify current contacts and the feedback method

☐ Prepare printed and accessible digital options as appropriate

☐ Assign speaking, facilitation, note-taking, technical-support, and follow-up roles

☐ After the event, document questions, commitments, corrections, and follow-up items

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7 Colusa Subbasin GDM Outreach Material Selection and Use Guide

7.1 Colusa Subbasin FAQ

Purpose	When to use	How to use	Emphasize	Refrain from
Primary public-facing reference for GDM, WAS, statements, NGWI, data, feedback, and next steps.	Routine questions.	Find the matching question, use the guiding answer, provide the feedback path, and refer unresolved questions to GSA staff, who will route it to the appropriate consultant.	Statements are draft and informational.	Refrain from making legal, account-specific, fee, allocation, or water-right determinations.

7.2 GDM Program Roadmap Flyer

Purpose	When to use	How to use	Emphasize	Refrain from
Plain-language overview of GDM, adaptive management, triggers, and potential actions.	Introductory conversations and handouts.	Orient the stakeholder to the roadmap and identify current status.	Program purpose and importance of feedback.	Refrain from representing draft triggers or potential actions as adopted requirements.

7.3 WAS Overview Flyer

Purpose	When to use	How to use	Emphasize	Refrain from
Plain-language overview of WAS, SGMA, and NGWI.	Introductory conversations and handouts.	Orient the stakeholder to the WAS.	What NGWI is and how it's derived.	Refrain from describing statements as final or tying them directly to future fees or allocations.

7.4 SGMA 201 Presentation

Purpose	When to use	How to use	Emphasize	Refrain from
Workshop presentation with SGMA, basin conditions, subsidence, GDM, WAS, and NGWI context.	Presentations and technical follow-up.	Select slides needed for the audience and confirm dates and draft labels.	Local context and how WAS/GDM fit within SGMA.	Refrain from using outdated slides.

7.5 CGA and GGA Overview Maps

Purpose	When to use	How to use	Emphasize	Refrain from
Local orientation maps showing GSA areas.	Questions about local management or geography.	Begin with the map and identify the relevant GSA.	CGA and GGA jointly manage the Subbasin.	Refrain from using the map as a legal boundary or parcel determination.

7.6 Example Water Accounting Statements

Purpose	When to use	How to use	Emphasize	Refrain from
Redacted examples for explaining statement layout and definitions.	Walk-throughs and statement questions.	Start with the account summary and disclaimer.	Draft and informational status; feedback path.	Refrain from inferring stakeholder account information.

7.7 WAS Explainer Video

Purpose	When to use	How to use	Emphasize	Refrain from
Short visual overview of the statement.	Pre-meeting orientation and follow-up.	Pair the video with the Colusa Subbasin FAQ and Feedback Form.	Purpose of the statement and review process.	Refrain from relying on the video alone, especially if it is outdated.

7.8 Water Accounting Statement Feedback Form

Purpose	When to use	How to use	Emphasize	Refrain from
Existing system for reporting possible corrections.	Potential errors or updated contact information.	Help locate the account number and explain useful supporting information.	Feedback will be reviewed.	Promising a requested correction will be incorporated or that a revised statement will be issued.

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8 Video and Online Resource Index

- Colusa Subbasin YouTube Channel
- Glenn Groundwater Authority SGMA Overview video
- Colusa Subbasin Water Accounting Statement Explainer video
- Colusa Subbasin Groundwater Sustainability Plan Implementation video
- DWR SGMA Data Viewer
- California Groundwater Live
- DWR SGMA Portal
- DWR Groundwater Data and Tools

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