



Joint Colusa Groundwater Authority and Glenn Groundwater Authority Board of Directors

Special Meeting Agenda

February 23, 2024 | 10:00 a.m.

122 Old Highway 99W, Maxwell, CA 95955

Alternate Meeting Locations:

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* Indicates an Action Item

1. **Call to Order, Roll Call, and Introductions**
2. **Approval of Minutes (pg. 3)**
 - a. ***January 26, 2024 CGA/GGA Joint Board Meeting Minutes (CGA, GGA)**
3. **Period of Public Comment**

At this time, members of the public may address the Board Members regarding items that are not on the agenda but are of relevance. The Boards may not act on items not on the agenda.
4. **Update on Water Year 2023 Annual Report (10 minutes) (pg. 4)**
5. **Colusa Subbasin Groundwater Sustainability Plan (GSP) (90 minutes) (pg. 5)**
 - a. **Discussion and concurrence on approach to develop a domestic well mitigation program.**
 - b. **Discussion and concurrence on approach to develop a demand management program**
 - c. **Discussion and concurrence on Groundwater Level Sustainable Management Criteria.**

d. Discussion on monitoring network and basis of Sustainable Management Criteria for land subsidence.

6. Member Reports and Comments

7. Adjourn

A complete agenda packet, including back-up information, is available for inspection during normal business hours at 1213 Market Street, Colusa, CA 95932 or 225 N. Tehama St., Willows, CA 95988. The full agenda packet can also be found on the CGA and GGA websites: [Agendas and Minutes 2023 | Colusa Groundwater Authority \(CGA\)](#)
<https://www.countyofglenn.net/dept/planning-community-development-services/water-resources/glenn-groundwater-authority/gga>

In compliance with the Americans with Disability Act, if you require special accommodation to participate in this meeting, please contact the Carol Thomas Keefer, CGA Program Manager, at 650-587-7300 X17 or Glenn County Water Resources Division at 530-934-6540 prior to any meeting and arrangements will be made to accommodate you.

Staff Report

To: CGA-GGA Joint Board

Agenda Item: 2. Approval of Minutes

Date: February 23, 2024

Background

The January 26, 2024 CGA/GGA Joint Board Meeting Minutes are being prepared for review and will be distributed under separate cover.

Recommendation

CGA and GGA Action: Approve the January 26, 2024 CGA/GGA Joint Board Meeting Minutes.

Attachments

- January 26, 2024 CGA/GGA Joint Board Meeting Minutes (will be distributed under separate cover)

Staff Report

To: CGA-GGA Joint Board

Agenda Item: 4. Update on Water Year 2023 Annual Report

Date: February 23, 2024

Background

The consultant team (Davids Engineering and Luhdorff & Scalmanini Consulting Engineers) has been working diligently to prepare the 2023 Water Year Annual Report which is due April 1, 2024. The Joint TAC receive a presentation on February 9, 2024 to review the technical components of the report. Each GSA Board will receive presentations at their regular meetings in late February or early March. A brief verbal update will be provided on the status of the report preparations.

Recommendation

Information only.

Attachments

- None

Staff Report

To: CGA-GGA Joint Board

Agenda Item: 5. Colusa Subbasin Groundwater Sustainability Plan (GSP)

Date: February 23, 2024

Background

On October 26, 2023, the Department of Water Resources (DWR) issued a letter informing the Groundwater Sustainability Agencies (GSAs) of its determination of the Colusa Subbasin GSP to be “incomplete”. The letter outlined specific deficiencies and recommended corrective actions which include:

- a) Re-evaluation of the overdraft conditions in the Subbasin using the most recent data, and include projects and management actions to mitigate overdraft;
- b) Providing a more detailed explanation and justification of the sustainable management criteria for groundwater levels, particularly minimum thresholds and measurable objectives, and quantify the effects of those criteria on beneficial uses; and
- c) Providing a more detailed explanation and justification of sustainable management criteria, monitoring method, and projects and management actions related to land subsidence.

The consultant team (Davids Engineering) has been retained to complete the Colusa Subbasin GSP Revisions to address the identified deficiencies. The work has been broken into two phases, the first of which will provide the consultant team with policy guidance from the GSA Boards. The second phase will include the plan revisions based on the policy direction provided in Phase 1.

The CGA/GGA Joint TAC received presentations from the consultant team and engaged in discussion on the identified deficiencies in order to provide recommendations to the GSA Boards.

The consultant team will share a summary of the Joint TAC discussions, followed by discussion and concurrence on approaches to develop a domestic well mitigation program and a demand management program, discussion and concurrence on Groundwater Level Sustainable Management Criteria (SMC), and a discussion on the monitoring network and basis of SMC for land subsidence.

Recommendation

1. Discuss and concur on approach to develop a domestic well mitigation program.
2. Discuss and concur on approach to develop a demand management program.
3. Discuss and concur on Groundwater Level Sustainable Management Criteria.
4. Discuss the monitoring network and basis of Sustainable Management Criteria for land subsidence and provide direction to consultant team.

Attachments

- Presentation (draft) (pg. 7)
- Select sections of a draft agreement establishing a domestic well mitigation program. (pg. 20)
- Select sections of a draft agreement establishing a demand management program. (pg. 24)

DRAFT



Colusa Subbasin GSP Revisions

Joint GSA Board Meeting

February 23, 2024

Agenda

- 1. Introductions and Timeline**
- 2. Takeaways from DWR Consultation Meetings**
- 3. Proposed Revisions:**
 - 1. Projects and Management Actions (PMAs)**
 - 2. Groundwater Level SMC**
 - 3. Subsidence Monitoring and SMC Basis**
- 4. Next Steps**

Introductions

Thad Bettner, PE (Strategic Advisor)
Davids Engineering (Technical Team)
West Yost (Technical Team)

Timeline

Feb 2024	02/09 – Joint TAC Meeting
	02/16 – DWR Meeting #3
	02/23 – Joint Board Meeting
Mar 2024	03/08 – Joint TAC Meeting
	TBD – DWR Meeting #4
	03/22 – Joint Board Meeting
	03/27 – Draft Revised GSP for Review
Apr 2024	04/09 – Comments on Draft Revised GSP
	04/12 – Joint GSA Board Meeting (Review Draft Revised GSP and Comments)
	04/16 – Final Revised GSP Released
	04/19 – Joint GSA Board Meeting (Adopt Revised GSP)
	04/22 – Submit Revised GSP

Takeaways from DWR Consultation Meetings

Deficiencies As Outlined in DWR’s Review Letter

1. **Overdraft:** “The GSP does not include a reasonable assessment of overdraft conditions and reasonable means to mitigate overdraft.”
2. **Groundwater Levels:** “The GSP does not establish sustainable management criteria (SMC) for chronic lowering of groundwater levels in a manner substantially compliant with the GSP regulations.”
3. **Subsidence:** The GSP does not establish SMC for land subsidence in a manner substantially compliant with the GSP regulations.

Our discussions are focused only on these deficiencies and the efforts needed to resolve these sufficiently.

Takeaways from DWR Consultation Meetings

- DWR’s main concerns, priorities:
 - Existing conditions don’t indicate the subbasin is on track to reach sustainability.
 - Undesirable results (URs) must be justified (DWR senses that URs have happened).
- GSP revision approaches are on the right conceptual track, but:
 - PMAs are needed to mitigate overdraft, subsidence and groundwater level decline.
 - Actions are warranted immediately.
- **The revisions should focus on:**
 - **Developing management actions as backstops to address overdraft, GW conditions.**
 - **Revising the SMC for more justifiable URs, minimum thresholds (MTs).**

Approaches Discussed with DWR and GSAs

- **Overdraft**
 - Move forward with overdraft revisions based on groundwater levels (Annual Report approach)
 - Provide for recurring evaluation each year (Annual Report)
- **PMAs**
 - **Projects** (*lower priority*): Update available details on timeline, benefits
 - **Management Actions** (*higher priority*): “Formal Agreement” approach
 - Understand that approach is conceptually suitable, but need to provide sufficient detail
 - Prepare draft “Formal Agreement” content to review with GSAs, DWR
- **SMC Revisions**
 - Groundwater levels and subsidence:
 - Revise URs, MTs to represent “unreasonable” conditions, with justification
 - Clarify relationship between groundwater level SMC and subsidence
 - Subsidence-specific:
 - No ongoing subsidence after 2042 (SGMA requirements)
 - More frequent subsidence monitoring vs. SMC (InSAR)
 - Evaluate subsidence impacts to critical infrastructure

Focus Today →

Focus in Next Meeting →

Proposed Revisions: Projects and Management Actions (PMAs)

Approach for PMA Revisions

- **Project Updates (Lower Priority)**
 - Add details to clarify Planned/Ongoing Projects (coordinating with proponents)
 - Add new project details (from Annual Reports, 2022 solicitation, recent grants/applications)
- **Management Action Updates (Higher Priority)**
 - Propose, refine, and sign “**formal agreements**” to develop and implement programs
 - **Domestic well mitigation**
 - **Demand management** (mitigating overdraft, subsidence)
 - Moving forward with GSA staff/chairs/counsel to draft program details, review with DWR
 - **Looking for consensus on concepts and draft details discussed with TACs, DWR**
 - Show the GSAs’ commitment to urgent action
 - Show the planned approach, and provide confidence in its likelihood of success

Domestic Well Mitigation Program

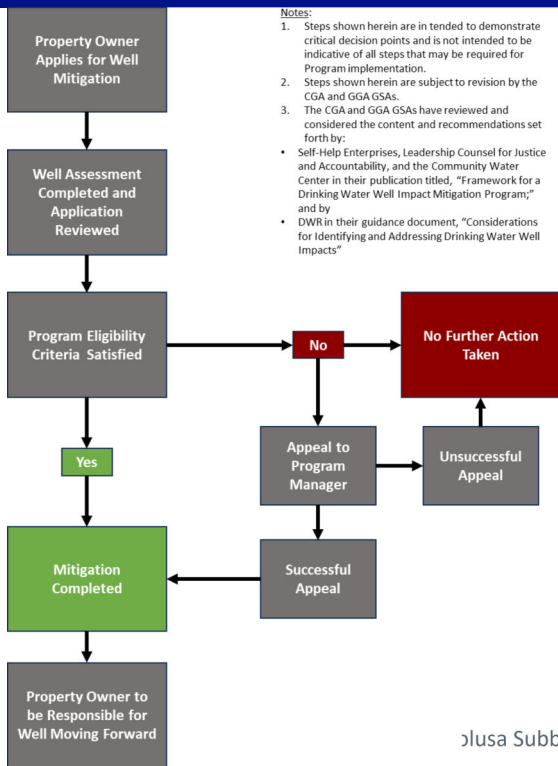
Potential Program Measures:

- Short-term solutions in emergencies, e.g., delivery of bottled water and/or water tanks.
- Deepening existing wells, or otherwise rehabilitating or replacing wells (including abandonment of old well).
- Lowering pumps in existing wells, or replacing pumps in existing wells.
- Well consolidation (many to one).
- Connection to or development of public water systems to serve impacted communities.
- Connection to municipal water systems.

Considerations for implementing program measures:

- Program is a temporary fix before achieving sustainability (2042).
- Conduct a well evaluation process to determine appropriate mitigation measures. (structured form to verify the well impacts/causes, eligibility, preferred solution).
- Mitigate only once per well (permanent solution under the GSP, e.g., drill deeper than MTs).
- Potentially coordinate program with well permitting/ordinances to minimize well impacts.
- Coordinate with existing programs in the Subbasin, such as county programs.

Domestic Well Mitigation Program Development



Items to consider in Program development:

- Program application process (left)
- Public outreach
- Eligibility criteria (property/property owner)
- Preferred contractors (reputable services)
- Initial well evaluation
- Program form development (participation terms, agreement, education process/requirement)
- Priority (first-come-first-served)
- Eligible mitigation (supply focused) vs. non-eligible services (landscaping, ongoing maintenance, etc.)
- Mitigation award (how costs will be reviewed/approved)
- Recordation of mitigation award
- Coordination with counties, other programs
- Post-mitigation responsibility (property owner to be responsible for well moving forward)

Understand we do not need to make all these decisions now, but provide details on how we will work through these decisions.

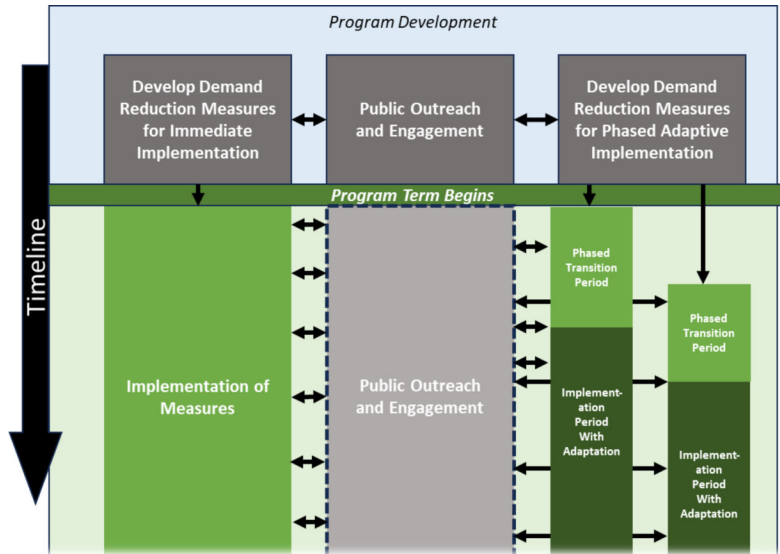
Consensus on Proposed PMA Revisions

- **Domestic Well Mitigation Program**
 - **Potential program measures**
 - Agree with listed measures as potential options for mitigation?
 - Agree with considerations for implementing Program measures?
 - **Considerations for program development**
 - Agree with items to consider in Program development?
 - Agree with general Program workflow?

Demand Management Program

- **Potential Program Measures:**
 - **Immediate Implementation** (at Program start date)
 - Voluntary measures for reducing demand
 - Dry farming
 - Fallowing
 - Incentivized land use changes
 - Multi-benefit land repurposing (e.g., recharge basins, renewable energy, habitat, recreation)
 - Best management practices (agronomic practices, soil management, runoff capture)
 - Water conservation (focus on activities to reduce consumptive use/extraction)
 - **Phased Adaptive Implementation** (prepare to implement, commensurate with issues)
 - Allocations
 - Water market/trading and/or fee structures
 - Allocation of extracted vs consumed groundwater
 - Phased transition period toward sustainable yield
 - Land use/zoning restrictions, in coordination with the Counties

Demand Management Program Development



Notes:
 1. Steps shown herein are intended to demonstrate critical components and is not intended to be indicative of all steps that may be required for Program Implementation.
 2. Steps shown herein are subject to revision by the CGA and GGA GSAs.

- **Items to consider in Program development:**
 - Program implementation process (*left*)
 - Public outreach and engagement process
 - Coordination with existing programs
 - Implementation of phased measures
 - Area(s) where measures are applicable
 - Sustainable yield for those areas
 - Transition period from current → sustainable conditions
 - Process and timeline for evaluating, adapting measures
 - Specific considerations, for example:
 - Allocation of consumed vs. extracted groundwater?
 - Land use restrictions on new or existing uses?
 - Monitoring/enforcement process
 - Funding/financing

- **Understand we do not need to make all these decisions now, but provide details on how we will work through these decisions.**

Consensus on Proposed PMA Revisions

- **Demand Management Program**
 - **Potential program measures**
 - Agree with measures for “Immediate Implementation”?
 - Agree with measures for “Phased Adaptive Implementation”?
 - Agree with considerations for implementing Program measures?

 - **Considerations for program development**
 - Agree with items to consider in Program development?
 - Agree with general Program workflow?

Proposed Revisions: Groundwater Level (GWL) SMC

Groundwater Level (GWL) SMC: Deficiency Recap

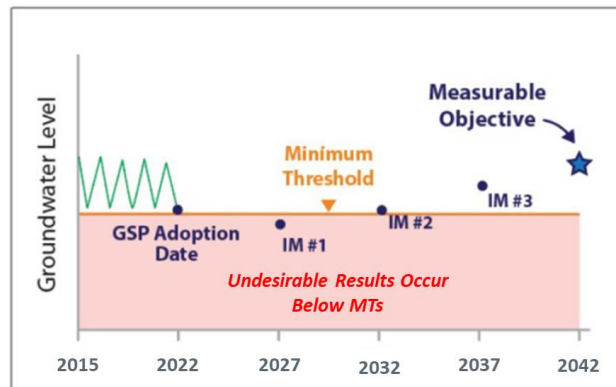
- “The GSP does not establish SMC for chronic lowering of groundwater levels in a manner substantially compliant with the GSP regulations.”
- **Key Needs:**
 - Clearly justify how **URs and MTs represent significant and unreasonable conditions**, especially for domestic well users and GDEs, and **why conditions before then do not**. *(Likely requires rephrasing UR definitions and revising MTs.)*
 - Show clear consideration of PMAs that will supply alternate supplies of water and mitigate impacts to domestic wells (e.g., municipal connections, well mitigation).
 - Clarify **relationship between GWL SMC and subsidence**, if revised GWL SMC are lower than historical (pre-SGMA) levels.

GWL SMC: Undesirable Results (URs)

- Need to update UR definitions:
 - Describe what URs are (what conditions are significant/unreasonable) and impacts to beneficial users
 - Justify criteria for identifying (e.g., MT values and exceedance)
- Current Definition (Jan 2022):
 - “A result that would cause *significant and unreasonable reduction in the long-term viability* of beneficial uses and users over the planning and implementation horizon of this GSP.”
 - “...Experienced if sustained groundwater levels are too low to *reasonably* satisfy beneficial uses/users”
 - “*Significant/unreasonable*” number of dry wells
 - “*Significant/unreasonable*” reduction in pumping capacity
 - “*Significant/unreasonable*” need for deeper wells, lower pumps
 - Adverse impacts to environment
- **Need clarity - At what GWL do these conditions occur? (consider conditions in 2020-2022)**

GWL SMC: Proposed Revisions to URs

- Revise definition to speak to conditions that occurred in 2020-2022:
 - Dry wells at rates observed in 2020-2022
 - Reduction in pumping capacity as observed in 2020-2022
 - Need to deeper wells, lower pumps as observed in 2020-2022
 - Adverse impacts to the environment
- Provides clearer, justifiable basis for:
 - Explaining impacts to beneficial uses and users (e.g., domestic well impacts that were observed)
 - Connection to subsidence (i.e., subsidence that was observed)
 - MTs that represent where those conditions begin to occur (look at GWL in 2020-2022)



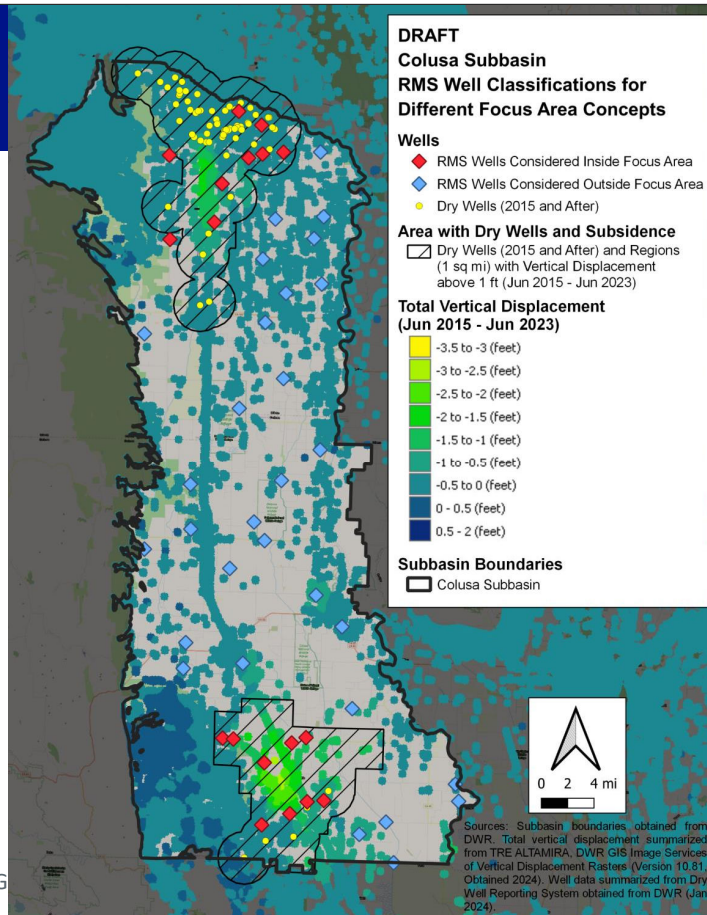
Source: DWR, 2017. Sustainable Management Criteria Best Management Practices.

GWL SMC: Proposed Revisions to SMC

- **Minimum Thresholds (MTs):** Based on 2020-2022 GWL data
 - **Areas with dry wells and/or subsidence since 2015** (Within “Focus Areas”): **2020-2022 low**
 - **Areas without dry wells and/or subsidence since 2015** (Outside “Focus Areas”): **2020-2022 low + 10 ft deeper (margin)**
 - Considerations:
 - Already know the conditions those years (undesirable, challenging period)
 - Some wells do not have 2020-2022 data, use earlier period where needed (e.g., 2015-2022 low)
- **Measurable Objectives (MOs):** Avg. pre-SGMA GWL (2011-2015)
- **Interim Milestones (IMs):** spanning range from MTs → MOs
 - 2027: Equal to MT
 - 2032: Equal to 1/3 range between MT→MO
 - 2037: Equal to 2/3 range between MT→MO

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Colusa Subbasin GSP Revisions – Joint G



Decision on Proposed GWL SMC Revisions

- **UR Definitions:** Revise to speak to undesirable impacts to groundwater uses/users in 2020-2022
 - Dry wells at rates observed in 2020-2022
 - Reduction in pumping capacity as observed in 2020-2022
 - Need to deeper wells, lower pumps as observed in 2020-2022
- **MT Revisions:** Revise based on historical data, either:
 - **2020-2022 low** (in areas with reported dry wells since 2015, subsidence)
 - **2020-2022 low + 10 ft deeper (margin)** (in areas without reported dry wells since 2015, subsidence)
 - *Use earlier low for RMS wells with limited data in recent years*
- **MO Revisions:** Revise based on historical data (**2011-2015 mean**)
- **IM Revisions:** Revise to span range from MT→MO (starting at MT in 2027)

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Proposed Approach: Subsidence Monitoring and SMC Basis

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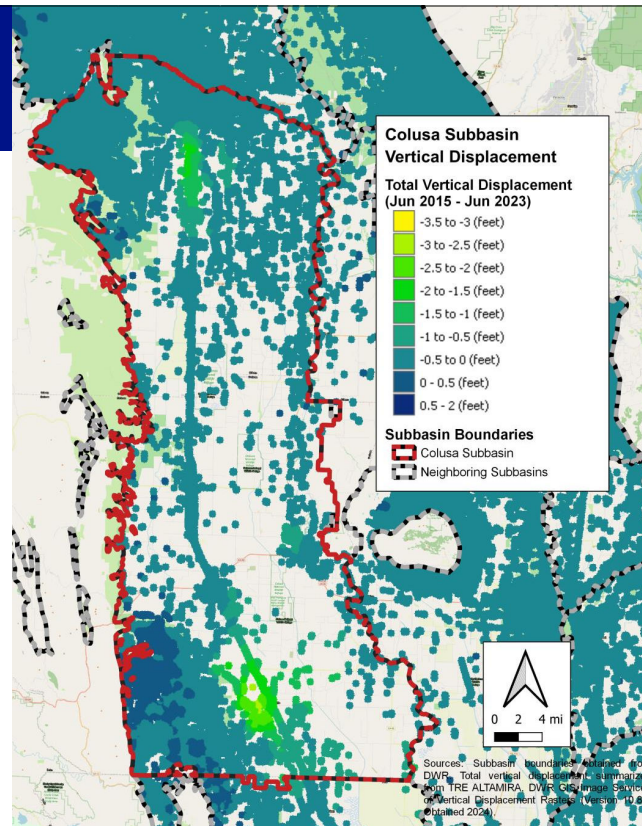
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Subsidence Monitoring and SMC Basis

- Discussed SMC deficiencies with DWR, some immediate recommended revisions
- **Monitoring and SMC Basis:**
 - Currently based on Sacramento Valley Benchmark Network (last surveyed 2017)
 - **Revise monitoring and SMC based on InSAR***
 - Until such a time as the benchmark network is surveyed
 - Propose periodic spot-measurements at benchmarks to check against InSAR (e.g., biannually)
- **SMC Revisions**
 - **Revise SMC to clarify SGMA requirement of no subsidence past 2042** (+/- uncertainty each year, but no long-term subsidence over a multi-year averaging period)

* InSAR = Interferometric Synthetic Aperture Radar



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Next Steps

Next Steps and Timeline

- **Joint TAC Meeting on 03/08**
 - Discuss subsidence SMC topics, revisions
 - Provide remaining technical details needed to support PMA revisions, GSA decisions
- **DWR Consultation Meeting #4 in March**
 - Discuss subsidence revisions, SMC
 - Evaluate progress and alignment with DWR recommendations



DRAFT AGREEMENT

ESTABLISHING A DOMESTIC WELL MITIGATION PROGRAM FOR THE COLUSA SUBBASIN OF THE SACRAMENTO VALLEY GROUNDWATER BASIN

*This document outlines draft content in **select sections** of the DRAFT agreement between the CGA and GGA GSAs to develop and implement a domestic well mitigation program (Program).*

The Program would mitigate impacts to drinking water wells (i.e., domestic wells and shallow wells that supply drinking water users) resulting from declining groundwater levels and subsidence that occur from groundwater management activities during the GSP Implementation Period (through 20242, or until sustainability is achieved).

Items in red are proposed for Technical Advisory Committee consideration.

DRAFT CONCEPTUAL CONTENT - SELECT AGREEMENT SECTIONS

1. POTENTIAL PROGRAM MITIGATION MEASURES

Potential Program mitigation measures may include, but are not limited to:

- Short-term solutions in emergencies, such as delivery of bottled water and/or water tanks. (Considered only for temporary mitigation while other actions are in progress.)
- Deepening existing wells, or otherwise rehabilitating or replacing wells (including abandonment of existing wells).
- Lowering pumps in existing wells, or replacing pumps in existing wells.
- Well consolidation (many to one).
- Connection to or development of public water systems to serve impacted communities.
- Connection to municipal water systems.

A well evaluation process will be used to determine the appropriate Program mitigation measures for each mitigated well. The well evaluation process would follow a structured protocol involving:

- Assessment of impacts to the well and underlying causes.
- Determination that the well impacts are related to groundwater management during the GSP Implementation Period (e.g., not related to normal wear and tear)
- Determination and recommendation of an appropriate mitigation strategy (i.e., one of the potential Program mitigation measures above).

Additional technical details considered in Program mitigation measures:

- The Program is considered a temporary solution to mitigating domestic well impacts before maintaining sustainable groundwater conditions (by 2042).

- Mitigation will occur only once for each well, and will be appropriate to and commensurate with the actual or anticipated well impacts resulting from groundwater management during the GSP Implementation Period (i.e., if a well is dry due to groundwater level decline, and deepening that well is the appropriate Program mitigation measure, the well will be deepened below the MT to ensure that the same well impacts will not occur again during GSP implementation).
- The Program will be coordinated with other applicable programs in the Subbasin (e.g., County-administered programs).
- Potential Program measures may include, but will not be limited to, well permitting or ordinances to spatially and vertically isolate new wells to minimize impact on wells. The design and implementation of such measures would be coordinated with existing and/or new County well permitting processes and ordinances.

2. PROGRAM DEVELOPMENT

In preparation for Program implementation, the GSAs will clearly define the Program's purpose, objectives, roles, responsibilities, requirements, and potential outcomes. Items for consideration during Program development include, but are not limited to:

- Definitions
- Program application process (how will property owners apply to and be approved to participate in the Program)
- Public outreach process
- Coordination of Program with counties, other programs
- Program eligibility criteria, potentially including:
 - Property eligibility
 - Property owner eligibility
- Preferred contractors (reputable contractors authorized to provide Program services)
- Initial well evaluation (inspecting the well and underlying issues)
- Program form development (formalizing an agreement between the GSAs and the property owner, including participation terms and education requirements as needed)
- Priority (propose first-come-first-served)
- Eligible mitigation versus non-eligible mitigation (what will and won't be covered)
- Mitigation award (how will the costs of mitigation be reviewed and approved)
- Recordation of mitigation award
- Post-mitigation responsibility (property owner to be responsible for well moving forward)

These items will be defined in an agreement to be signed by the GSAs, or authorized representative of the GSAs, and the property owner receiving mitigation services through the Program.

3. OTHER AGREEMENT SECTIONS CURRENTLY IN DEVELOPMENT

Other DRAFT agreement sections currently in development (although not provided at this time):

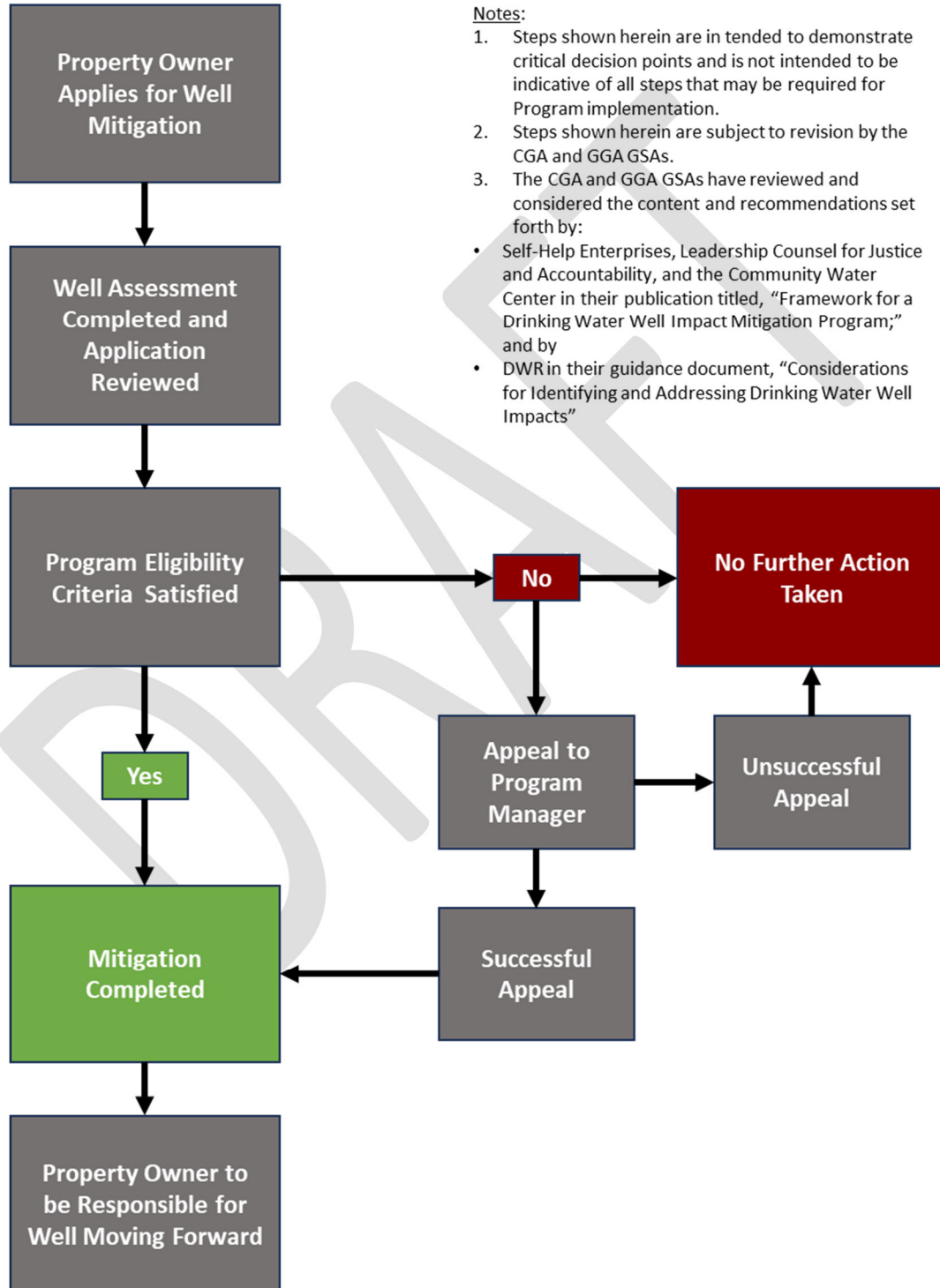
- Program Term (i.e., anticipated Program start date)
- Proportionate Responsibility
- Funding/Financing
- Program Implementation (although a DRAFT flowchart is included below)
- Program Management
- Environmental Review
- Notices

4. DRAFT PROGRAM IMPLEMENTATION FLOWCHART

The draft exhibit below outlines a **draft process for how the Program would be implemented to mitigate wells.**

DRAFT

DRAFT Exhibit.
Colusa Subbasin Domestic Well Mitigation Program
DRAFT Implementation Flowchart.



Notes:

1. Steps shown herein are intended to demonstrate critical decision points and is not intended to be indicative of all steps that may be required for Program implementation.
2. Steps shown herein are subject to revision by the CGA and GGA GSAs.
3. The CGA and GGA GSAs have reviewed and considered the content and recommendations set forth by:
 - Self-Help Enterprises, Leadership Counsel for Justice and Accountability, and the Community Water Center in their publication titled, "Framework for a Drinking Water Well Impact Mitigation Program;" and by
 - DWR in their guidance document, "Considerations for Identifying and Addressing Drinking Water Well Impacts"

DRAFT AGREEMENT
ESTABLISHING A DEMAND MANAGEMENT PROGRAM
FOR THE COLUSA SUBBASIN OF THE SACRAMENTO VALLEY GROUNDWATER BASIN

*This document outlines draft content in **select sections** of the DRAFT agreement between the CGA and GGA GSAs to develop and implement a demand management program (Program).*

The Program would review, plan, and implement actions for demand management to mitigate overdraft, groundwater level decline, and subsidence resulting from groundwater management activities during the GSP Implementation Period (through 20242, or until sustainability is achieved).

Items in red are proposed for Technical Advisory Committee consideration.

DRAFT CONCEPTUAL CONTENT - SELECT AGREEMENT SECTIONS

1. POTENTIAL PROGRAM MEASURES

The Program is anticipated to include some subset of the following measures:

- Measures to be considered and moved forward for **immediate implementation (at the Program start date)**. Measures may include, but are not limited to:
 - Voluntary measures for reducing demand
 - Dry farming
 - Fallowing
 - Incentivized land use changes
 - Multi-benefit land repurposing (e.g., recharge basins, renewable energy, habitat, recreational spaces)
 - Best management practices (agronomic practices, soil management, runoff capture, etc. to reduce groundwater demand)
 - Water conservation (focusing on activities to reduce consumptive use/extraction)
- Measures to be considered and moved forward for **phased adaptive implementation** (i.e., develop the actions further so that they are ready to implement in phases, commensurate with issues). Measures may include, but are not limited to:
 - Allocations, considering:
 - Well/pumping restrictions, in coordination with the Counties
 - Water market/trading and/or fee structures
 - Land use/zoning restrictions, in coordination with the Counties
- The Parties agree that phased adaptive implementation measures are to be implemented commensurate with:
 - The amount of demand reduction required.
 - The issue(s) facing the area(s) where the measure(s) are to be implemented.

2. PROGRAM DEVELOPMENT

In preparation for Program implementation, the GSAs will clearly define the Program's purpose, objectives, roles, responsibilities, requirements, and potential outcomes. Items for consideration during Program development include, but are not limited to:

- Definitions
- Program actions, including:
 - Measures for immediate implementation (i.e., measures that will move forward at the Program start date)
 - Measures for phased adaptive implementation (i.e., measures that will be developed further so that they are ready to implement in phases, commensurate with issues)
- Public outreach and engagement process
- Coordination with existing programs
- Implementation considerations protocol for phased measures:
 - Identification of area(s) where measures are applicable
 - Determination of sustainable yield for those areas
 - Determination of an appropriate transition period from current → sustainable conditions (prior to 2042), considering uncertainties of the basin setting and of the timelines for other projects.
 - Process and timeline for implementing phased measures.
 - Process and timeline for evaluating, adapting measures to respond to changing conditions (annual reports and periodic GSP evaluations).
 - Considerations for specific actions, for example:
 - Allocation of consumed vs. extracted groundwater?
 - Land use restrictions on new or existing uses?
 - Monitoring/enforcement process
 - Funding/financing

These items will be defined in a Program agreement to be signed by the Parties according to the term indicated below.

3. OTHER AGREEMENT SECTIONS CURRENTLY IN DEVELOPMENT

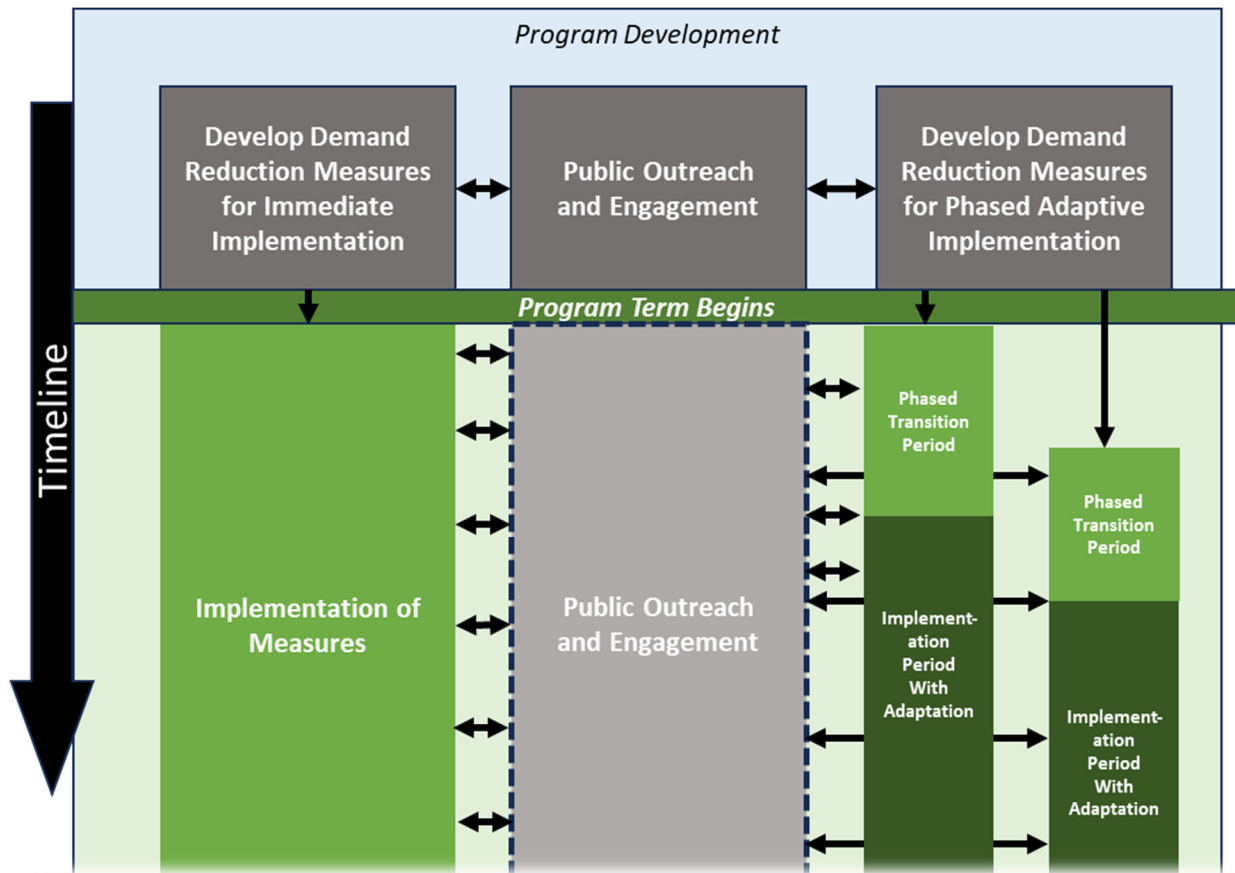
Other DRAFT agreement sections currently in development (although not provided at this time):

- Program Term (i.e., anticipated Program start date)
- Proportionate Responsibility
- Funding/Financing
- Program Implementation (although a DRAFT flowchart is included below)
- Program Management
- Environmental Review
- Notices

4. DRAFT PROGRAM IMPLEMENTATION FLOWCHART

The draft exhibit below outlines a **draft process for how the Program would be implemented.**

DRAFT Exhibit. Colusa Subbasin Demand Reduction Program DRAFT Implementation Flowchart.



Notes:

1. Steps shown herein are intended to demonstrate critical components and is not intended to be indicative of all steps that may be required for Program implementation.
2. Steps shown herein are subject to revision by the CGA and GGA GSAs.