

**GLENN COUNTY
TECHNICAL ADVISORY COMMITTEE**
For the Water Advisory Committee

Glenn County Department of Agriculture
720 North Colusa St., Willows, CA 95988
Phone: (530) 934-6501 Fax: (530) 934-6503
E-Mail: wateradv@countyofglenn.net
Web Page: <http://www.glenncountywater.org/>

AGENDA

MEETING DATE: Monday, June 27, 2016
TIME: 10:00 A.M.
PLACE: Glenn County Department of Agriculture
720 N. Colusa Street, Willows, CA 95988

I. INTRODUCTIONS:

TAC Members:

Kevin Backus	Glenn Co. Env. Health	Ben Pennock	Central Area
Marcie Skelton	Glenn Co. Ag Dept.	Lance Boyd	South Area
Matt Gomes	Glenn Co. P&PWA	John Brooks	North Area
Leigh McDaniel	Board of Supervisors	Erin Smith	DWR
Anjanette Shadley	East Area	Allan Fulton	UCCE

II. PUBLIC COMMENT:

Any person wanting to address the Technical Advisory Committee on any item NOT ON TODAY'S AGENDA may do so at this time. Please limit your comments to three (3) minutes. The Technical Advisory Committee will not be making decisions or determinations on items brought up during Public Comment.

III. APPROVAL OF MINUTES:

- a. Consider approval of the minutes of the May 26, 2016 meeting.
- b. Consider approval of the minutes of the June 2, 2106 meeting.

IV. DISCUSSION AND/OR ACTION ITEMS:

- a. WAC report
 1. Draft letter to Board of Supervisors (POSSIBLE ACTION)
- b. Well Permit application process-revisions (POSSIBLE ACTION)
- c. BMO compliance-Stage Alert definitions and actions (POSSIBLE ACTION)
- d. Export of Groundwater (POSSIBLE ACTION)
- e. Other topics of interest (DISCUSSION)

V. COMMUNICATIONS:

VI. NEXT MEETING:

- a. The next TAC meeting will tentatively be scheduled at today's meeting.
- b. The next WAC meeting is scheduled for 12, 2016.

VII. ADJOURN

Any documents related to agenda items that are made available to the Technical Advisory Committee before the meeting shall be available for review by the public during normal business hours at 720 North Colusa Street, Willows, California, 95988.

In compliance with the Americans with Disabilities Act, if you need special assistance or accommodations to participate in this meeting, please contact Lisa Hunter at the Glenn County Department of Agriculture at 530-934-6501. Notification at least 48 hours prior to the meeting will enable the Glenn County Water Advisory Committee to make reasonable arrangements to ensure accessibility to this meeting. (28 CFR 35.101-35.164 ADA Title II.)

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Web Page: <http://www.glenncountywater.org/>

MINUTES

MEETING DATE: Thursday, May 26, 2016
TIME: 1:40 P.M.
PLACE: Glenn County Department of Agriculture
720 N. Colusa Street, Willows, CA 95988

I. INTRODUCTIONS:

TAC Members Present:

Kevin Backus Glenn Co. Env. Health
Matt Gomes Glenn Co. PPWA
Lance Boyd PID/PCGID-South Area
Allan Fulton (1:51) UCCE

Others in Attendance:

Lisa Hunter Glenn Co. Ag Dept.
George Pendell Stony Creek
Bill Ehorn DWR
Doug Ross Mirror Newspaper
Sharron Ellis
Kim Schumacher
Will Martin

TAC Members Absent:

Marcie Skelton Glenn Co. Ag Dept
John Brooks North Area
Erin Smith DWR
Leigh McDaniel Board of Supervisors
Anjanette Shadley East Area, WCWD
Ben Pennock Central Area

II. PUBLIC COMMENT:

None.

III. APPROVAL OF MINUTES:

The consideration of approval of the minutes was continued until the next TAC meeting due to lack of a quorum.

IV. DISCUSSION AND/OR ACTION ITEMS:

- a. WAC report— Lisa Hunter reported that the WAC met May 10. DWR provided a Spring Groundwater Conditions presentation and the WAC also reviewed the Spring 2016 BMO levels, which will be reviewed under Item c. Larry Domenighini also presented a report on the BMO Policy ad hoc committee progress. Board of Supervisors activities were also reviewed and Minutes Orders were distributed. SGMA was also discussed.

The WAC met again on May 24 to rescind an action that was taken at the May 10 meeting to send a letter to the Board of Supervisors to remove the well permit moratorium county-wide. The action was rescinded and discussion took place regarding the item. Ultimately the WAC directed the TAC to work with staff to draft a letter to the Board of Supervisors for WAC consideration using the following statement as a guideline:

“The WAC cannot recommend that the well moratorium be continued based on lack of sound data/science and further studies are needed to be done to gather data by a third party consultant and funding is needed to complete these studies.”

This item will be placed on the next TAC agenda in order to take action.

- b.** BMO Revisions—Lisa Hunter reviewed County Code 20.03 and the BMO process. Ms. Hunter also reviewed excerpts of the Report on Groundwater Level Declines in Western Glenn County report that was created by an ad hoc committee of the WAC, approved by the WAC and the Board of Supervisors in May 2014. This type of report meets the requirements to investigate a BMO non-compliance. This report is also relevant to the recent discussions.

A handout was provided as a guide for a Brainstorming Session for the next several items in order to facilitate discussion and potential recommendations. Discussion took place reviewing some items on the handout including an update to the WAC on the proposed BMO methodology concept and the contour years that were presented at an earlier WAC meeting. It may be helpful to have the WAC approve the method in order to allow the TAC to move forward with the next steps. A vertical component for BMO compliance, and challenges associated with such a component, was also discussed. A recommendation was made to work with Stanford and Chico State to develop a groundwater model.

- c.** Review spring 2016 groundwater level measurements—The spring 2016 BMO groundwater level measurements and stage alert levels were reviewed. A summary spreadsheet and map were provided as handouts. The spreadsheet also provides a comparison between spring 2015 and spring 2016 measurements. The TAC members reviewed the brainstorming session handout reviewing potential recommendations that can be made to the WAC. Discussion was held regarding the three mile radius surrounding Stage 3 wells being a potential management area. Maps were shown detailing the potential options. The Stage 3 area was also compared to DWR’s groundwater level change map. Another option is to clip the radius to the BMO area in which the well belonged so as not to affect a neighboring BMO area. There may be difficulty to develop actions in areas in which there is no monitoring. Some felt the three mile radius is appropriate, others felt the radius is not a legally defensible boundary. It may be beneficial to use the radius or the change map as a guide, but use road locations

or other legal descriptions instead. There are also some challenges to address wells not in a stage alert that fall within the three mile radius from a Stage 3 well. Another suggestion would be to extend the Stage 3 area to the west to the Bulletin 118 boundary. The north and south boundary to the extension would need further review and consideration. It may also be helpful to create a decision tree, similar to the one being created in the BMO revision process, to help determine which actions would be appropriate. The group was encouraged to think about what actions would be reasonable to require in a Stage 3 BMO area for further consideration at the next meeting.

- d. Well Permit application process—Some potential ideas to add to the well permit are easily added, others would be more difficult. Ideas presented in the brainstorming sessions were ideas that have been discussed previously or have been included in other County permits. All items need further discussion prior to making recommendations. Items that received positive feedback to include on a well permit include: GPS location, section/township/range, distance from edge of stream, well registration, parcel(s) served, and acres served. Items that were more negatively received include: notice to surrounding parcels, and minimum review period. Other items that will need further discussion include depth requirements, sealing requirements, casing requirements, pump test information, pumping capacity, annual summaries of water use, more detailed type of use information, permitting based on land zoning type and general plan update. Some items that seem to take care of themselves included minimum well depth and two levels of well completion through environmental health department in order to receive timely well completion reports. Handouts were provided for the TAC members to review prior to the next meeting, but were not discussed at today's meeting including a well permit application and the application review process.
- e. Export of groundwater—There was discussion highlighting the importance of moving water throughout the county to help with irrigation needs and recharge needs. Export within the basin or within the county was positively received. There was positive feedback that no export in stage three areas seems reasonable. It is important to recognize the difference between transfers and export. It was also mentioned that surface water users should not be penalized for having a dual system. Some discussion also took place regarding requiring an export permit. It was generally agreed that wells being drilled purely for the purpose of export out of the area should be discouraged. More discussion on these items is needed.
- f. Other topics of interest—Doug Ross addressed the committee regarding his attempt to provide information to the public

V. COMMUNICATIONS:

None discussed.

VI. NEXT MEETING:

The next TAC meeting will be scheduled for June 2, 2016, location to be determined.
The next WAC meeting is tentatively scheduled for June 14, 2016.

VII. ADJOURN

The meeting was adjourned at 4:02 p.m.

DRAFT

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Web Page: <http://www.glenncountywater.org/>

MINUTES

MEETING DATE: Thursday, June 2, 2016
TIME: 1:32 P.M.
PLACE: Glenn County Department of Agriculture
720 N. Colusa Street, Willows, CA 95988

I. INTRODUCTIONS:

TAC Members Present:

Kevin Backus	Glenn Co. Env. Health
Matt Gomes	Glenn Co. PPWA
Lance Boyd	PID/PCGID-South Area
Allan Fulton (1:46)	UCCE
Marcie Skelton	Glenn Co. Ag Dept
John Brooks (1:43)	North Area
Leigh McDaniel	Board of Supervisors
Anjanette Shadley	East Area, WCWD
Ben Pennock	Central Area

Others in Attendance:

Lisa Hunter	Glenn Co. Ag Dept.
George Pendell	Stony Creek
Zac Dickens	GCID
Geoff Fulks	Cal Water
Sharron Ellis	Citizen
Lisa Humphreys	GCFB

TAC Members Absent:

Erin Smith	DWR
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II. PUBLIC COMMENT:

None.

III. APPROVAL OF MINUTES:

- a. A motion was made by Anjanette Shadley, with a second by Ben Pennock to approve the minutes of the November 2, 2015 meeting. The motion passed unanimously by members present.
- b. A motion was made by Ben Pennock, with a second by Lance Boyd to approve the minutes of the March 15, 2016. The motion was approved 4-0 with 3 abstentions (Matt Gomes, Anjanette Shadley, and Marcie Skelton).
- c. The minutes of the May 26, 2016 meeting were incomplete and were continued until the next TAC meeting.

IV. DISCUSSION AND/OR ACTION ITEMS:

- a. WAC report— Lisa Hunter provided a recap of the May 26 TAC meeting. The WAC has met a few times recently and provided direction to the TAC to work with staff to draft a letter to the Board of Supervisors for WAC consideration using the following statement as a guideline prior to the next WAC meeting on June 14:

“The WAC cannot recommend that the well moratorium be continued based on lack of sound data/science and further studies are needed to be done to gather data by a third party consultant and funding is needed to complete these studies.”

Discussion on drafting the letter was provided to staff. It was recommended to highlight a water budget being foundational to groundwater management. Other suggested items include adding resources to the County’s water program, funding for coordination/outreach, and attaching the list of tasks and status of the task that are included in the Preliminary Plan and the Report on Groundwater Level Declines in Western Glenn County. It was also recommended to add an approximate cost of the project if known and immediate needs. Other discussion included groundwater levels, well permit moratorium and well permitting, and safe yield and sustainability of groundwater.

Staff will draft the letter for inclusion in the June WAC meeting agenda packet for WAC consideration.

- b. Review spring 2016 groundwater level measurements—The spring 2016 BMO groundwater level measurements and stage alert levels were reviewed. A summary spreadsheet and map were provided as handouts. The TAC members discussed the brainstorming session handout reviewing potential recommendations that can be made to the WAC. Discussion was held regarding the three mile radius surrounding Stage 3 wells being a potential management area. Maps were shown detailing the potential options. The Stage 3 area was also compared to DWR’s groundwater level change map. Another option is to clip the radius to the BMO area in which the well belonged so as not to affect a neighboring BMO area. There may be difficulty to develop actions in areas in which there is no monitoring. A well permit moratorium as a potential action within the 3 mile radius area was discussed. Additional well permit requirements within that area were also discussed. It was the general agreement that some additional action needs to take place in the Stage 3 areas. However, some issues need to be resolved such as neighboring BMO wells in different stage alert levels, and how to address unmonitored areas, or wells that were not able to be measured, that are likely in similar conditions as the Stage 3 areas. It was the consensus of the TAC to do the following:
 - Direct staff to bring back elevation, depths, and well type of the BMO wells for TAC consideration in order to further discuss creating a clearly definable line between the conflicting “No Stage Alert” wells and Stage 3 wells in the northwest area of the County.

- Bring the 3 mile radius surrounding Stage 3 wells clipped to the appropriate BMO area to the WAC for discussion and feedback.
 - Recommend monthly monitoring for wells within the Stage 3 areas.
- c. Well Permit application process—This item was continued until the next TAC meeting.
- d. Export of groundwater—This item was continued until the next TAC meeting.
- e. Other topics of interest—None.

V. COMMUNICATIONS:

None discussed.

VI. NEXT MEETING:

The next TAC meeting is tentatively scheduled for late June.

The next WAC meeting is scheduled for June 14, 2016.

VII. ADJOURN

The meeting was adjourned at 4:03 p.m.



Glenn County Environmental Health Department

247 N. Villa Avenue, Willows, CA 95988
Tel: 530-934-6102 Fax: 530-934-6103

Well Permit Application

Well Permit #

Applicant Information:

Owners Name: _____ Phone #: _____
Mailing Address: _____ Fax #: _____
Email Address: _____
Well Contractor: _____ Phone #: _____
Well Contractor Email: _____ Fax #: _____
Well Contractor CA C-57 License # _____

Property & Well Location:

Assessor's Parcel Number: _____ Well GPS Coordinates: _____
Well Longitude: _____ Well Latitude: _____
Property Address/Location: _____
(Provide Nearest Cross Road)

Type of Work:

New Well Replacement Well Repair/Deepen Test Hole Destruction

Well Type:

Domestic Industrial Agricultural Monitoring Public Soil Boring # ()
Cathodic Protection Other _____

Distance From Well:

Septic Tank (ft.): _____ Leachfield (ft.): _____ Animal Enclosure (ft.): _____

Pump Information:

Pump Contractor: _____ Phone #: _____
License Number: _____ Pump Type: _____ Horsepower: _____

Construction Detail Proposed:

Well Depth (ft.): _____ Conductor Material: _____
Borehole Dia. (in): _____ Conductor Dia. (in): _____
Casing Depth (ft.): _____ Conductor Depth (ft.): _____
Casing Dia. (in): _____ Seal Depth (ft.): _____
Casing Material: _____ Gravel Pack: Yes No
Casing Gauge: _____

Construction Detail Actual:

Well Depth (ft.): _____ Conductor Material: _____
Borehole Dia. (in): _____ Conductor Dia. (in): _____
Casing Depth (ft.): _____ Conductor Depth (ft.): _____
Casing Dia. (in): _____ Seal Depth (ft.): _____
Casing Material: _____ Gravel Pack: Yes No
Casing Gauge: _____

Destruction Detail:

Well Depth (ft.): _____ Well Diameter (in): _____ Depth to Water (ft.): _____

Sealing Material:

Neat Cement 10.3 Sack, Sand Cement Concrete
Bentonite: Type: _____ Product Name: _____

Plot Plan

Indicate all distances in feet. Provide the names of streets or roads nearest to the property. Provide dimensions of the property, water surface features and all existing and proposed structures. Provide locations of existing and proposed onsite wastewater treatment systems, including expansion and repair areas, within 300 feet of the new well. Provide locations of all other wells within 300 feet of the new well. Location information shall include all adjacent parcels, if within the setbacks.

A labelled satellite image or aerial photo (ex. Google earth) may be submitted in place of a plot plan drawing and would be preferred.

DRAFT



Permit Application Conditions of Approval

Agreement and Signature of Owner and Well Contractor:

I certify that I have read this application and the information described herein is correct. I agree to comply with all State and County laws, standards, ordinances, regulations and conditions related to this well, and hereby agree to obtain all required inspections of this well. I agree to contact the Environmental Health Department at least 2-business days prior to the desired inspection time(s). I agree to submit a "Well Completion Report" (if required) to the Environmental Health Department, within 60 days of well seal completion.

I understand that this well may become subject to further requirements and/or restrictions in order to meet groundwater management and/or sustainability goals, including, but not limited to, metering, extraction reporting, required monitoring, reduced pumping, or revised scheduling. I certify that I will work cooperatively with County Officials and hereby authorize County Officials to enter this property, with prior notification, in order to implement groundwater management and/or sustainability goals.

I understand every permit expires one year after issuance. I further understand that if the well cannot be completed within one year I may apply for an additional one year extension, before the permit expires and with Environmental Health Department approval.

Signature of Owner

Date

Signature of Well Contractor

Date

Official Use Only

Date: _____ Application Approval: _____
REHS Signature

Date: _____ Conductor Seal Approval: _____
REHS Signature

Date: _____ Annular Seal Approval: _____
REHS Signature

Date: _____ Well Log Received: _____
REHS Signature

Date: _____ Final Approval: _____
REHS Signature

Date: _____ Fee Paid: _____ Receipt #: _____ Rec'd by: _____

BMO Compliance Evaluation Procedure and Actions: (as per Exhibit A)

Stage 1:

- None at this time (Area 1, 2, 3, 16)
- Groundwater management actions to be undertaken following a Stage 1 condition shall be informational to the WAC and by notification to the public. (Area 4, 5, 8, 9, 10)
- Groundwater levels are monitored and reviewed monthly. There is no BMO compliance evaluation procedure at this time. (Area 6, 7)
- Stage 1 management actions may include increased monitoring frequency and distribution to determine if the problem is unique to the well or is regional. Well recovery is to be monitored during the following spring. (Area 11)
- The Technical Advisory Committee of the Glenn County Water Advisory Committee will perform this evaluation (BMO compliance) and report the results of the evaluation to the WAC. (No management associated with the compliance.) (Area 12, 13, 14, 15, 17)

Stage 2:

- None at this time (Area 1, 2, 3, 16)
- Groundwater management actions to be undertaken following a Stage 2 condition shall be informational and investigational. Upon identification of the Stage 2 condition, the noncompliance will be reported to the WAC and the public. Following review and concurrence, the WAC shall direct the TAC to initiate an investigation to determine the cause(s) of the noncompliance and make recommendations as to the nature of the noncompliance as well as how to address and possibly avoid similar conditions in the future. The TAC shall report their findings and recommendations back to the WAC in a timely manner to adequately reflect on the issue. (Area 4, 5, 8, 9, 10)
- Groundwater levels are monitored and reviewed monthly. There is no BMO compliance evaluation procedure at this time. (Area 6, 7)
- Stage 2 management actions will include taking steps to investigate the extent of the problem (i.e. local or regional) and implement appropriate measures to reduce the negative impacts of the problem. Appropriate measures may include voluntary water conservation plans, "in-lieu" groundwater recharge or other methods to reduce groundwater extraction until water levels recover. (Area 11)
- The Technical Advisory Committee of the Glenn County Water Advisory Committee will perform this evaluation (BMO compliance) and report the results of the evaluation to the WAC. (No management associated with the compliance.) (Area 12, 13, 14, 15, 17)

Stage 3:

- None at this time (Area 1, 2, 3, 16)
- Groundwater management actions to be undertaken following a Stage 3 condition shall be informational, investigational, and actionable. Upon identification of the Stage 3

condition, the noncompliance will be reported to the WAC and the public. Following review and concurrence, the WAC shall direct the TAC to initiate an investigation to determine the cause(s) of the noncompliance and make recommendations as to the nature of the noncompliance as well as how to address and correct the noncompliance. The TAC shall report their findings and recommendations back to the WAC in a timely manner to adequately take action. The WAC will then work with the local and adjoining sub-areas to implement needed adaptive management activities necessary to correct the problem. Such adaptive management activities shall include, but not limited to, voluntary water conservation measures, redistribution or reduction of groundwater extraction, and/or other measure(s) referred to or identified in Ordinance 1115 as recommended by the WAC and approved by the Board of Supervisors. (Area 4, 5, 8, 9, 10)

- Groundwater levels are monitored and reviewed monthly. There is no BMO compliance evaluation procedure at this time. (Area 6, 7)
- Stage 3 management actions shall be more aggressive than previous stages and should include mandatory conservation measures, implementing recharge programs or prohibiting any groundwater export programs outside the basin. (Area 11)
- The Technical Advisory Committee of the Glenn County Water Advisory Committee will perform this evaluation (BMO compliance) and report the results of the evaluation to the WAC. (No management associated with the compliance.) (Area 12, 13, 14, 15, 17)

County Code:

○ Section 130

Action by Water Advisory Committee: Revised

A. In the event that the TAC identifies an area of noncompliance with a BMO, unrelated to export, the TAC shall report to the WAC and the Board on the regional extent and magnitude of the noncompliance. This information shall also be released to the public. This report shall be made in a timely manner established by the board based upon the severity of the situation. The TAC shall then collect all available pertinent data and investigate possible causes for the BMO noncompliance, and recommend actions to resolve the BMO noncompliance to the WAC and the Board. These recommendations shall also be made in a timely manner established by the board based upon the severity of the situation. It shall be the intent of the TAC to first make recommendations that focus on resolving the BMO noncompliance through negotiations with all parties in the affected area.

B. If TAC recommendations do not result in timely and positive actions to reestablish BMO compliance; the WAC shall then recommend an adaptive management plan to the Board to constrain the identified causes in the affected area. This action will only be taken on the recommendation of the TAC after a thorough technical review of the issue. The Board shall also have the authority to intervene into isolated areas impacted by overdraft that occur anywhere in the County if the affected landowners in that area are unable to resolve their own issues.

(Ord. 1237 § 1, 2012; 1115 § 1, 2000.)

Section 140

Action by Board of Supervisors

The Board shall act as the Enforcement Agency for this ordinance. Any recommendation of the TAC or the WAC may be appealed to the Board. (Glenn County Code sections 01.001-015.) "Enforcing officer" means the County public officer or County board, commission or department designated by state law or the board of supervisors to enforce any provisions of state law, this code or other County enactment. "Enforcing officer" includes any officer, employee or agent of the County to whom enforcement powers have been lawfully delegated by a designated enforcement officer or by the board of supervisors.

(Ord. 1237 § 1, 2012; 1126 § 2, 2000; Ord. 1115 § 1, 2000.)

Potential Stage Alert Actions—DRAFT-- June 27, 2016

No Stage Alert:

- Continue monitoring
- Evaluate for significant changes/trends

Stage 1 Alert:

- Continue activities under “no stage alert”
- Public outreach
 - Press release with groundwater level information
 - Post information to the website
- TAC investigate and report on possible causes and determine if widespread or localized. The evaluation should include:
 - Water use analysis
 - Land use analysis
 - Precipitation and climate evaluation
 - Water budget updates
 - Surrounding groundwater conditions
 - Undesirable results analysis

If the above items are not appropriate, or the TAC is unable to prepare the analysis, an explanation should be included in the report.

- TAC outline a Stage 2 action plan for implementation if conditions do not improve (to be completed prior to the next BMO compliance evaluation). The action plan should include the following:
 - Increased public outreach
 - Increased monitoring locations and frequency
 - Well permitting plan for stage 2 areas (could include required monitoring access including access port, monitoring requirements, limiting to one active well per legal parcel, well spacing-vertical/horizontal, casing/construction/design restrictions)
 - Well registration for all wells (could include location, acreage served, crop, anticipated amount to be used, general pumping schedule)
 - Initial research in potential recharge program(s) including location, type, and funding for the program

If the above items are not appropriate, an explanation should be included in the action plan.

Stage 2 Alert:

- Continue activities under “no stage alert”
- Public outreach
 - Press release with water level information

- Post information to the website
- Review and provide any updates to investigation to determine possible causes and determination if widespread or localized.
- Implement Stage 2 action plan.
- TAC outline a Stage 3 adaptive management action plan for implementation if conditions worsen. The action plan should include the following:
 - Development of recharge program(s) including financial planning
 - Moratorium on new wells with exemptions
 - Well permitting plan for exempted wells in stage 3 areas
 - Meters on wells producing more than 2 AF or used for non-residential purposes
 - Mandatory reporting of water use
 - Revised or reduced pumping schedules
 - Limit amount of water use per acre
 - Well registration continues with additional information as necessary

If the above items are not appropriate, an explanation should be included in the action plan.

Stage 3 Alert:

- Continue activities under “no stage alert”
- Public outreach
 - Press release with water level information
 - Post information to the website
 - Hold informational public meetings
- Review and provide any updates to investigation to determine possible causes and determination if widespread or localized.
- Implement Stage 3 adaptive management action plan including voluntary and mandatory actions contained within the plan.
- TAC outline an emergency action plan for implementation if conditions worsen. The action plan should include the following:
 - Identify avenues for locating water sources for public needs
 - Identify financial resources to address emergency needs for domestic and livestock water shortages

If the above items are not appropriate, an explanation should be included in the action plan.