

Demand Management Working Group

April 14, 2026 | Meeting 19 | CBI Notes

DMWG Meeting Discussion Feedback

A. General - Document-wide

- a. Confirm proper use of “District,” “GSA,” and “Board”
 - i. Rationale: District serves as the GSA but holds distinct authorities. Question whether Board needs to be clarified as GSA Board.
 - ii. **Flagged as something that County counsel may want to weigh in on.**
- b. Add page numbers
 - i. Rationale: ease of navigation

B. Section 1.5 - Terminology

- a. Address grammar fragment, “For the purpose of spatial implementation”
 - i. Rationale: original sentence mentioning Thiessen was removed during the meeting discussion, but created sentence fragment.
- b. Consider converting section into a separate glossary (appendix)
 - i. Rationale: some may find it easier to refer to an appendix with a glossary rather than a specific section with the main document.
 - ii. **Flag for BOD or County counsel recommendation.**

C. Section 2.5 - Outreach requirements

- a. Concerned with references to “emergency,” “severe,” and “irreversible” language. Converted real time, “where the GSA Board determines, based on the administrative record, that an undesirable result (as defined in the applicable GSP) exists and requires immediate regulatory action.”
 - i. Rationale: Group wanted flexibility to be responsive to groundwater problems while also ensuring public input opportunity was part of the process. However, they didn’t want potentially subjective perspectives on what is considered an emergency, severe, etc. Tying process to GSPs’ definition of URs gives a specific definition that calls for the Board to formally state that SGMA-defined URs are being experienced and management actions must occur.
 - ii. **DONE. Addressed in real-time.**

D. Section 3.2 - Conceptual plan

- a. Edit issue: reference to Appendix A
 - i. Rationale: relic edit that wasn’t in the Red-line
 - ii. **DONE: confirmed in latest version.**

E. Section 5.1 - Credit system measure types

- a. Add “credit system” to groundwater allocations and credit system
 - i. Rationale: in-lieu credits are different from water market/trading.
 - ii. **DONE. Addressed in real-time.**

F. Section 5.2 - Implementation protocol

- a. Add “budget and funding” to the annual review bullet
 - i. Rationale: DM-related fees should be an explicit discussion topic when conducting DM Program annual reviews.
 - ii. **DONE. Addressed in real-time.**
- b. Confirm annual review bullet is clearly independent from SGMA annual reporting.
 - i. Rationale: Concern raised that SGMA annual reporting bar is primarily data-driven. DM Program review should be a separate, more process with considering the program’s DM-performance and policy dimensions.
 - ii. **DONE: Addressed real-time.**

G. Section 6.2 - Reporting and adaptive management

- a. Change annual reporting consistent w/ SGMA to being consistent with the annual review process described in Section 5.2
 - i. Rationale: inconsistent relic with the changes made in section 5.2.
 - ii. **DONE: Addressed real-time.**

H. Section 8.3 - Program Timeline

- a. Remove reference to “trigger criteria” under the Technical foundation development step.
 - i. Rationale: The group decided trigger criteria was more of a policy topic rather than technical. Also, the “Yield and trigger methodology” step mentions triggers without distinguishing if it’s a policy or technical discussion (as there are some overlapping components).
 - ii. **Need to confirm in the new clean version.**

I. Section 9.1 - Program Governance

- a. Replace, “committe *should* be formed...” with “shall”
 - i. Rationale: A committee (i.e., the DMWG) already exists. “Should” is aspirational. “Shall” assures accountability
 - ii. **DONE. Addressed real-time.**
- b. Confirm if there are other mentions of “should” that need to be replaced with “shall.”
 - i. Rationale: same rationale as above.
 - ii. **Flagged for legal recommendation.**