CENTRAL DELTA-MENDOTA GROUNDWATER SUSTAINABILITY AGENCY

PUMPING REDUCTION PLAN

APPROVED: February 27, 2025

CENTRAL DELTA-MENDOTA PUMPING REDUCTION PLAN

TABLE OF CONTENTS

TABLES (IN REPORT TEXT)

1 INTRODUCTION

The Central Delta Mendota GSA (CDMGSA) has developed this Pumping Reduction Plan (PRP or Plan) in accordance with Section 16.1 of the 2024 revised Groundwater Sustainability Plan (2024 GSP) for the Delta Mendota Subbasin (Basin). The PRP addresses the six required components specified in the 2024 GSP:

1. Monitoring and Data Collection Plan;
2. Overdraft Mitigation Plan;
3. Groundwater Level Minimum Threshold (GWL-MT) Avoidance Plan;
4. Water Quality Minimum Threshold (WQ-MT) Exceedance Plan;
5. Subsidence Avoidance Plan, and;
6. Groundwater Allocation Backstop.

This PRP will cover the jurisdictions of all of the CDMGSA member agencies (GSP Table Intro-2), except for Widren Water District and Tranquility Irrigation District. Both of those entities have separate plans that are coordinated with the CDMGSA PRP. For the purposes of this PRP, all wells within Southern DMC Subsidence Management Area (SSMA), as defined in the Southern DMC Subsidence Management Area Policy (Attachment A), are assumed to be Lower Aquifer wells, unless the landowner can demonstrate otherwise. Acceptable documentation may include a well drillers log showing well perforation or a video inspection. Any composite wells will be treated as Lower Aquifer wells under this Plan.

For applicable PRP components, specific triggers and procedures are defined. These include an entry trigger to activate the PRP, a zone of impact (ZOI) to determine where the PRP will be applied, a cutback approach to provide quantitative estimates of pumping reductions, an exit trigger to conclude the cutback once objectives are met, and enforcement measures to ensure successful implementation. Additional monitoring and reporting requirements are outlined in each component, aligning with the Monitoring and Data Collection Plan.

2 MONITORING AND DATA COLLECTION PLAN

In accordance with Section 16.1 of the 2024 GSP, the Monitoring and Data Collection Plan developed by each GSA or GSA Group must include commitments and strategies for achieving the eight components outlined in Table 1. The CDMGSA has committed to meeting all these requirements as detailed in Table 1. CDMGSA has adopted two GSA policies to address the requirements under this component, included in **Attachment A**:

- Administrative Policy #1: Well Census and Registration (Policy #1): Aims to establish and achieve an accurate and comprehensive well census for all wells within the CDMGSA boundary by requiring all existing wells to be registered using a form provided by the CDMGSA no later than April 1, 2021, and mandating that any new wells constructed after this date be registered within 30 days of the completion of drilling activities.
- Administrative Policy #2: Well Metering and Reporting (Policy #2): Aims to build upon Policy #1 by establishing a requirement for the measurement of groundwater extractions from all wells within the CDMGSA boundary, with certain exceptions, by mandating that all wells have a CDMGSA-approved meter installed no later than December 31, 2023, and requiring that any new wells constructed after this date be registered with the CDMGSA within 30 days of completing drilling activities and have a CDMGSA-approved meter installed prior to use.

Table 1. Scheduled compliance with the requirements of the monitoring and data collection plan

Requirement	Commitment
Regular monitoring network(s) assessment	CDMGSA will conduct an annual assessment of its monitoring network and its adequacy in conjunction with annual report preparation.
Quarterly groundwater level monitoring	Will be conducted aligned with GSP implementation and its requirements.
Semiannual water quality monitoring	Will be conducted aligned with GSP implementation and its requirements.
Well registration policy	Per Administrative Policy #1, all wells in CDMGSA were required to be registered by April 2021, and all new wells are required to be registered within 30 days of completion.
Well metering policy	Per Administrative Policy #2, meters were required to be installed on all wells by April 2021, and all new wells are required to be metered prior to operation.
Well extraction reporting policy (including estimation of pumping from composite wells)	Per Administrative Policy #2, extractions are required to be reported on a monthly basis by 31 October for the preceding water year.
Provide well construction information for all monitoring wells	In process and will be accomplished through communication with the coordination committee.

Replacing composite/production wells in the monitoring network with dedicated monitoring wells by 2030	In Process and will be accomplished by 2030.

3 OVERDRAFT MITIGATION PLAN

3.1 Objective and Requirement

The CDMGSA is required to reduce its average pumping by approximately 18,743 acre-feet per year (AFY) by 2030, based on the overdraft evaluation period of Water Year [WY] 2003 to WY 2023. This includes a 1,303 AFY reduction in the Upper Aquifer and a 17,440 AFY reduction in the Lower Aquifer. The corresponding pumping averages for the evaluation period estimated by the model and used to calculate the pumping reduction volumes are 33,904 AFY and 114,501 AFY, from Upper Aquifer and Lower Aquifer, respectively. The 2024 GSP mandates achieving this reduction through an annual minimum of 20% of the total apportioned pumping cut, beginning in January 2026 and continuing each year for the following five years, and shown in Table 2.

Table 2. Pumping reduction schedule for Upper and Lower Aquifers to achieve the total overdraft mitigation required by GSP

WY	Upper Aquifer		Lower Aquifer	
	Available Pumping from WY2003-2023 Simulated Average Aquifer Pumping (AFY)	Annual Pumping Reduction Target (AFY) From WY2003-2023 Simulated Average	Available Pumping from WY2003-2023 Simulated Average Aquifer Pumping (AFY)	Annual Pumping Reduction Target (AFY) From WY2003-2023 Simulated Average
2025	33,904	0	114,501	0
2026	33,643	261	111,013	3,488
2027	33,122	521	114,502	6,976
2028	32,340	782	104,038	10,464
2029	31,298	1,042	114,503	13,952
2030	**29,995**	**1,303**	**97,063**	**17,440**

The pumping reductions implemented under the CDMGSA Subsidence Avoidance Plan and GWL-MT Avoidance Plan are expected to contribute significantly toward meeting the agency's overdraft mitigation targets. To address any remaining overdraft reduction requirements, the CDMGSA will reduce overall pumping across its area by applying an AFY per acre allocation in areas not impacted by the Subsidence and GWL-MT Avoidance Plans, ensuring the total required commitment is achieved.

3.2 Implementation Approach

Overdraft mitigation will be implemented according to the approach outlined in Section 6 Subsidence Avoidance Plan. The Supplemental OMF will include implementation details as required by the GSP.

3.3 Coordination with other GSAs to Achieve Required Pumping Reduction

This PRP will cover the jurisdictions of all CDMGSA member agencies (GSP Table Intro-2), except for Widren Water District and Tranquility Irrigation District. Both of those entities will have separate plans that are coordinated with the CDMGSA's PRP.

3.4 Additional Monitoring and Reporting Requirements

Planned pumping reductions will be verified and adjusted through metered pumping implemented under Policy #2 and according to the Monitoring And Data Collection Plan.

3.5 Enforcement

The Groundwater Allocation Backstop will be enforced in cases of implementation lapses, with further actions governed by the dispute resolution mechanisms in the Basin GSAs' Memorandum of Agreement (MOA).

4 GROUNDWATER LEVEL MINIMUM THRESHOLD AVOIDANCE PLAN

4.1 Objective and Requirements

Per Section 16.1.1.3 of the GSP, the CDMGSA member agencies are required to identify GWL-MT hotspots[1] based on defined triggers by the end of February each year for identified groundwater level representative monitoring wells (RMW-WLs) within each principal aquifer and implement targeted pumping cutbacks, on an AFY/acre basis. These cutbacks will be applied at the rate and within an area determined by the ZOI and Cutback Approach (Section 4.4), accompanied by increased monitoring frequency, and adapted as required and justified under this PRP.

4.2 Investigation Trigger

The occurrence of any of the following conditions at an RMW-WL triggers a GWL-MT investigation that may lead to hotspot designation and require pumping reductions:

- Exceedance of the GWL-MT, determined by comparing the most recent seasonal low measurement (Fall) to the defined MTs (per GSP Section 16.1.1.3); OR
- Projected exceedance of the GWL-MT, based on the linear trend of the previous four Fall groundwater level measurements (using the seasonal average if multiple measurements are taken; per GSP Section 16.1.1.3).

If multiple measurements are taken during a season, the average will be used for comparison.

4.3 Investigation Approach

The investigation should verify the accuracy of the groundwater level measurement at the RMW-WL, ensuring it is not influenced by pumping from the well itself, nearby wells, or any unusual management practices in the area. This process includes taking measurements after an adequate shutoff period to allow groundwater levels to stabilize. It may also involve measuring water levels in nearby wells to identify trends for comparison and analyzing pumping activities in the surrounding area to determine whether they deviate from typical practices.

The CDMGSA member agencies are required to complete the investigation within the same measurement season and no later than 30 days after the initial reading. The results must be reported to CDMGSA. If the findings fail to provide sufficient evidence to refute the projected exceedance of the trigger, the RMW-WL will be designated as a GWL-MT hotspot, and the cutback requirements outlined in this PRP will be implemented.

4.4 Zone of Impact and Cutback Approach

The ZOI around hotspot RMW-WLs will initially be defined as the smaller of either a 2-mile radius from the RMW-WL where the exceedance occurred or two-thirds of the distance from the nearest RMW-WL to the hotspot RMW-WL, with a minimum ZOI of 1 mile. The ZOI represents areas where groundwater pumping is likely to affect water levels at the RMW-WL and may extend beyond GSA boundaries. To

[1] Per GSP, if groundwater levels at groundwater level representative monitoring wells (RMW-WL) exceed established trigger levels or are projected to exceed an MT, an investigation is required to determine if the RMW-WL should be designated as an MT hotspot and require an RMW-WL. This plan will designate an RMW-WL that exceeds any of the cutback entry triggers an MT hotspot.

achieve the target groundwater level recovery, an initial pumping limit of 1.0 AFY/acre will be imposed within the ZOI. The target groundwater level recovery is tied to the cutback exit trigger outlined in Section 4.5. The initial ZOI and cutback limits are designed as starting points and may be adjusted based on the 3-month rolling linear trend of groundwater levels. Adjustments will be made to increase or decrease the cutback proportionally, based on a comparison of current groundwater level trends with the previous year and projections of groundwater levels for the upcoming fall derived from those trends.

The CDMGSA member agencies subject to pumping cutbacks may initiate an independent investigation, conducted by or under the supervision of a licensed professional engineer or geologist, to assess and recommend revisions to the ZOI and cutback allocations. This investigation must provide sufficient technical evidence to the CDMGSA, demonstrating that the proposed changes will meet the exit trigger by the upcoming fall. Any adjustments to the ZOI boundaries or pumping limits will require CDMGSA approval.

4.5 Cutback Exit Trigger

The pumping cutback may be exited upon occurrence of any of the following conditions:

- Groundwater level at the hotspot RMW-WL matches or exceeds its designated Measurable Objective (MO);
- Linear trend of the four most recent Fall measurements (one Fall measurement per water year ending in the current year's measurement) does not project a GWL-MT exceedance in the next Fall;
- Entry trigger was an exceedance of GWL-MT and the groundwater level at the hotspot RMW-WL is above GWL-MT in the most recent Fall measurement.

Following the determination that the exit trigger condition has been met, the uniform acre-foot per acre pumping limit will be removed by the respective CDMGSA member agencies throughout the ZOI through communications with the applicable groundwater users.

4.6 Additional Monitoring and Reporting Requirements

Per GSP Section 16.1.1.3, the GWLs and pumping within the ZOI will be measured monthly during the implementation of the pumping cutback. Measured data within the ZOI should be submitted to the CDMGSA within two weeks of collection. All data reported should also be imported into the Basin Data Management System (DMS) by the respective CDMGSA member agencies.

4.7 Enforcement

The Groundwater Allocation Backstop will be enforced in cases of implementation lapses, or if a CDMGSA member agency fails to implement this PRP within two quarters. Further actions will be governed by the dispute resolution mechanisms in the Basin GSAs' MOA.

5 WATER QUALITY MINIMUM THRESHOLD EXCEEDANCE PLAN:

5.1 Objective and Requirements

Per GSP Section 16.1.1.4, the CDMGSA member agencies are responsible for identifying exceedances or projected exceedances of a WQ-MT. If such exceedances are linked to Basin management (pumping or recharge), the CDMGSA GSAs must investigate the cause and, if necessary, design and implement appropriate mitigation measures, including pumping cutbacks or other strategies, to prevent future WQ-MT exceedances caused by Basin management.

The WQ-MT Plan requires pumping cutbacks only when a clear connection or convincing evidence links changes in water quality concentrations—exceeding or projected to exceed their MTs—to management actions by the GSAs in the Basin or changes in groundwater levels. In the absence of such correlations or due to data limitations, the focus remains on continued monitoring and data collection. If needed, pumping cutbacks are carried out following the approach specified in the GWL-MT Avoidance Plan.

5.2 Investigation trigger

The occurrence of any of the following conditions at an identified groundwater quality representative monitoring well (RMW-WQ) triggers an investigation to assess the cause of the degradation and its correlation with groundwater level changes:

- Exceedance of the WQ-MT, determined by comparing the most recent seasonal low measurement (Fall) to the defined MTs (per GSP Section 16.1.1.4); OR
- Projected exceedance of the WQ-MT, based on a statistically significant linear trend of the previous three Fall groundwater level measurements (using the seasonal average if multiple measurements are taken; per GSP Section 16.1.1.4).

The statistical significance of a linear trend is determined using the p-value of the linear model. A p-value of less than 0.05 is generally considered statistically significant, but this threshold can be adjusted based on sample size and professional judgment. It is important to note that the occurrence of an investigation trigger does not automatically necessitate the implementation of pumping cutbacks.

5.3 Investigation Approach

The CDMGSA member agencies must complete an investigation within 60 days of reporting a WQ-MT investigation trigger and recommend next steps to the CDMGSA. The investigation should assess whether there is sufficient scientific evidence to link the RMW-WQ exceedance to actions taken within the Basin and/or declines in groundwater levels. If a reasonable correlation cannot be established or if the available data is inadequate to make a conclusion, more frequent sampling will be conducted until re-evaluation is possible.

If a correlation is identified, mitigation measures will be triggered, designating the RMW-WQ as a WQ hotspot. A link between declining groundwater levels and water quality will lead to a reduction in pumping, while a correlation involving groundwater levels and water quality for recharge projects will require actions related to project implementation. The CDMGSA retains discretion over evaluating the reasonableness of the investigation approach, its assessments, and its outcomes.

5.4 Mitigation Approach

Following the requirements of the GSP Section 16.1.1.4, upon triggering mitigation, respective CDMGSA member agencies will have 90 days to propose a mitigation action plan to address increased concentrations of constituents of concern (COCs) and prevent future exceedances of WQ-MTs. The responsible member agencies are required to notify groundwater pumpers within a three (3) mile radius of the RMW-WQ exceeding the trigger about the projected degradation and potential mitigation. The mitigation approach will depend on whether the trigger is caused by GWL declines due to pumping or by the implementation of projects and management actions (P/MAs), primarily recharge projects.

5.4.1 Mitigation for Degradation Due to Groundwater Level Decline

When water quality degradation is linked to groundwater level declines, a temporary GWL-MT hotspot will be established at the RMW-WQ or a nearby well with similar construction to monitor and manage conditions. The temporary GWL trigger will be set to the previous year’s seasonal high (average spring water level). Pumping cutbacks will be implemented following the GWL-MT process, with the temporary GWL trigger at the well acting as the target level.

A uniform pumping limit of 1 AFY/acre will be applied throughout the ZOI, initially defined as a 2-mile radius around the RMW-WQ hotspot, with communications from the respective CDMGSA member agencies to affected landowners and pumpers. Pumping within the ZOI and any need for curtailment adjustments will be reviewed quarterly by the CDMGSA member agencies to ensure compliance. Member agencies may request evidence-based modifications to the ZOI and cutback plan from the CDMGSA for approval as part of the proposed mitigation strategy.

Upon achieving the GWL target, the conditions will be reevaluated. If the cutback exit trigger is not met (WQ is not stabilized), the WQ/GWL correlation will be re-investigated. If a significant correlation persists, further cutbacks or other actions should be implemented.

5.4.2 Mitigation for Degradation Due to Recharge Projects

If it appears that the WQ-MT has been triggered by a recharge project, the investigation will determine if the degradation results from factors such as poor-quality recharge water, flushing of soil constituents, geochemical reactions, altered groundwater gradients, etc.

Following the requirements of the GSP Section 16.1.1.4, the respective CDMGSA member agencies will submit a detailed mitigation plan to the CDMGSA within the 90-day time frame. The recharge project must be paused during this period and until the exit trigger is met unless the respective the CDMGSA member agencies can justify successful mitigation through modified or continued operation. The plan should address the source of water quality degradation, identified in the investigation, and propose modifications to operations to mitigate incurred impacts. Throughout this period, WQ monitoring continues to ensure that any future triggers are addressed promptly. These actions aim to ensure a stable balance between groundwater recharge efforts and the protection of groundwater quality in the Basin, adapting as needed based on new data and observations.

5.5 Exit Trigger

Mitigation actions (pumping cutback or mitigation plan) can be exited if any of the following occur:

- GWL target is met, and WQ at the hotspot RMW-WQ does not show a statistically significant increasing trend using the last three measurements; OR

- GWL target is met, and a significant correlation between WQ and GWL can no longer be established; OR
- Projected WQ at the RMW-WQ will not exceed the respective WQ-MT.

Following the determination that the exit trigger condition(s) have been met, the respective CDMGSA member agencies throughout the ZOI will communicate the removal of mitigation measures to the applicable landowners/pumpers.

5.6 Additional Monitoring and Reporting Requirements

Monitoring will be generally conducted as outlined under the Monitoring and Data Collection Plan. All measurements and monitoring conducted under this Plan should be reported to the CDMGSA within two weeks. All data reported should also be imported into the Basin DMS by the respective member agencies.

5.7 Enforcement

Enforcement of this Plan is governed by the dispute resolution mechanisms in the Basin GSAs' MOA. When pumping cutbacks are implemented, enforcement mirrors the procedures used for GWL-MT violations. In such cases, failure to comply with implementation or a delay of more than two quarters will trigger the Groundwater Allocation Backstop.

6 SUBSIDENCE AVOIDANCE PLAN

6.1 Objective and Requirements

The CDMGSA is required to proactively address progressing land subsidence that does not or is not projected to comply with the requirements of the GSP as soon as feasible and implement pumping cutbacks that will bring back the identified regions into sustainability path of the Basin. The Subsidence Avoidance Plan has two components that lead to different requirements. The Critical Infrastructure Component applies to critical infrastructure while the hotspot mitigation component applies to the entire CDMGSA region.

6.2 Cutback Entry Trigger

6.2.1 Critical Infrastructure Component

The critical infrastructure component of the subsidence mitigation plan will go into effect in Water Year (WY) 2025. It applies to Delta-Mendota Canal (DMC) and California Aqueduct within CDMGSA. Historical accounts of land subsidence on the Westside of the San Joaquin Valley have shown that the sustainable amount of sub-Corcoran pumping is in the range of 0.50 AFY/acre.

For areas within the SSMA, the critical infrastructure component relating to the DMC will not rely on defined triggers, but rather will proactively curtail sub-Corcoran pumping within 1.0 mile of the DMC beginning in WY2025 and across all land within the SSMA by WY 2029. These measures are more protective than the triggers defined in the GSP and will automatically satisfy its requirements.

For areas within 0.5 miles of the DMC and outside of the SSMA, the critical infrastructure pumping reduction will be triggered if the 3-year moving average rate of inelastic subsidence exceeds 0.2 feet per year (ft/year) at any location within 0.5 miles of the DMC, attributed to in-Basin pumping using a consistent source of monitoring data.

With regard to the California Aqueduct, the critical infrastructure pumping reduction will be triggered if the 3-year moving average rate of inelastic subsidence exceeds 0.15 feet per year (ft/year) at any location within 0.5 miles of the California Aqueduct, attributed to in-Basin pumping using a consistent source of monitoring data. Additional and/or more restrictive criteria may be established if the San Luis Water District, in coordination with the California Department of Water Resources as the operator of the California Aqueduct, determines that additional and/or more restrictive criteria are necessary to avoid or mitigate subsidence-related impacts to California Aqueduct infrastructure or operations.

6.2.2 Hotspot Mitigation Component

The hotspot mitigation component of the Subsidence Avoidance Plan will be triggered if the five-year linear trend established based on InSAR data indicates a projected subsidence of more than 2.0 feet by 2040 (MT), or more than 0.5 feet by 2030 (IM), or an exceedance of any subsequent IM. This trigger will be based on subsidence caused by Basin management, or under conditions that such causality cannot be justifiably established.

6.3 Zone of Impact and Cutback Approach

6.3.1 Critical Infrastructure Component

6.3.1.1 Delta-Mendota Canal

In the initial year of implementation, the PRP will incorporate all sub-Corcoran wells within 1-mile of the DMC. Beginning in WY 2029, the ZOI will be expanded to the full SSMA within the portion of DMC covered under the CDMGSA Subsidence Policy. All wells within the ZOI will be limited to 0.50 AFY/acre, and pumping will be prohibited when South-of-Delta Central Valley Project allocations are at or above 45% of contracted supply. The pumping limitation shall be reviewed annually to determine the correlation between pumping and the measured subsidence. Additionally, construction of new Lower Aquifer or composite wells is prohibited within the SSMA.

In areas within 0.5-miles of the DMC and outside of the SSMA, where the three-year average subsidence rate exceeds 0.20 ft/year, symmetrically defined on both sides of the critical infrastructure, Lower Aquifer pumping will be limited to 0.50 AFY/acre, and construction of new Lower Aquifer or composite wells will be prohibited. The pumping limitation shall be reviewed annually to determine the correlation between pumping and the measured subsidence. If necessary, CDMGSA members within the SSMA will have the authority to adjust the pumping limit.

6.3.1.2 California Aqueduct

The zone of exceedance will be the area within 0.5 miles of the California Aqueduct where the three-year average subsidence rate exceeds 0.15 ft/year, symmetrically defined on both sides of the critical infrastructure. Lower Aquifer pumping will be limited to 0.50 AFY/acre within the ZOI, and construction of new Lower Aquifer or composite wells will be prohibited. The pumping limitation shall be reviewed annually to determine the correlation between pumping and the measured subsidence. If necessary, CDMGSA members within the SSMA will have the authority to adjust the pumping limit.

6.3.2 Hotspot Mitigation Component

The ZOI is defined as a radius of 0.5 miles around any point that meets the cutback entry trigger. Pumping cutbacks are initiated at a rate of 0.50 AFY/acre. The pumping limitation shall be reviewed annually to determine the correlation between pumping and the measured subsidence. If necessary, CDMGSA will have the authority to adjust the pumping limit.

6.4 Cutback Exit Trigger

6.4.1 Critical Infrastructure Component

The critical infrastructure component of the SSMA will remain in effect indefinitely, with amendments made as necessary. The program will be closely monitored to achieve the goal of eliminating GSA-caused subsidence by 2040. The GSP sets a cumulative subsidence limit (MT) of 2.0 feet for the period from 2020 to 2040, which allows for estimating an allowable annual subsidence rate based on the cumulative subsidence observed since 2020. Annual subsidence rates will be monitored, and the SSMA Policy will be reviewed and adjusted annually, as needed, to align with the allowable subsidence rate and address any discrepancies between actual and allowable subsidence.

Pumping reduction under the critical infrastructure component outside of the SSMA (i.e. around the California Aqueduct) may be relieved when any of the following conditions are met:

- The 4-year moving average rate of inelastic subsidence falls below 0.1 ft/year in the ZOI, per GSP Section 16.1.1.5; OR
- The CDMGSA member agencies can provide justification in the form of a technical report from a qualified professional to sufficiently demonstrate that subsidence is not caused due to pumping within ZOI, using multiple years of pumping measurement data gathered after the trigger.

6.4.2 Hotspot Mitigation Component

Pumping cutback under the Hotspot Mitigation Component may be relieved if any of the following conditions are met:

- Subsidence due to Lower Aquifer Pumping attributable to Basin is eliminated, per GSP Section 16.1.1.5; OR
- The five-year linear trend established based on InSAR data no longer indicates exceedance of cumulative MT or IMs; OR
- The CDMGSA member agencies can provide justification in the form of a technical report from a qualified professional to sufficiently demonstrate that subsidence is not caused due to pumping within ZOI, using multiple years of pumping measurement data gathered after the trigger.

Following the determination that the exit trigger condition(s) have been met, the uniform acre-foot per acre pumping limit will be removed by the respective CDMGSA member agencies throughout the ZOI through communications with the applicable landowners/pumpers.

6.5 Additional Monitoring and Reporting Requirements

Monthly pumping measurements and subsidence rates (if available) should be reported to the CDMGSA within two weeks of collection. All data reported should also be imported into the Basin DMS by the respective member agencies. If subsidence data is unavailable, quarterly reporting is sufficient. GWL measurements in the Lower Aquifer should be measured monthly within the ZOI and reported within two weeks of collection. Any updates to the number of known, active Lower Aquifer or composite wells should be reported within one month.

6.6 Enforcement

Enforcement of the Subsidence Avoidance Plan is governed by the dispute resolution mechanisms in the Basin GSA's MOA.

7 GROUNDWATER ALLOCATION BACKSTOP

7.1 Objective and Requirements

In accordance with Exhibit C of the MOA, the CDMGSA is required to implement the Groundwater Allocation Backstop if they cannot sufficiently meet the requirements of the PRP and GSP.

7.2 Cutback Entry Trigger

If the CDMGSA fails to achieve the allocated Overdraft Mitigation pumping reduction by 2030, the groundwater allocation backstop will be applied to the entire CDMGSA region.

7.3 Zone of Impact and Cutback Approach

If triggered by a failure to achieve the allocated overdraft mitigation pumping reduction by 2030, the ZOI will be defined as the entire CDMGSA region. Pumping within the entire CDMGSA region will be limited to the estimated sustainable yield for the Basin (by principal aquifer) and implemented through AFY/acre allocations.

In the event that allocations are implemented and one or more CDMGSA member agencies are not able to satisfy minimum health and safety requirements for municipal and industrial water uses from the allocation and all other available sources, the CDMGSA may find and make a determination that it is necessary to provide an additional allocation for municipal and industrial water uses and a corresponding reduction in the overall allocation. Any such allocation, if made, shall not result in pumping within the entire CDMGSA region exceeding the sustainable yield for the Basin.

It is the intention of the CDMGSA to conduct a study along with the other GSAs in the Basin to refine the estimated sustainable yield and, ideally, to determine local sustainable yields. Should local sustainable yields be determined, the relevant local sustainable yield will be used to define the backstop allocation, rather than the Basin-wide value. In any area that is subject to pumping limitations under other parts of this PRP, the most stringent limitation will apply. The AFY/acre pumping limit will be implemented by the respective CDMGSA member agencies throughout the entire CDMGSA region through communications with the applicable landowners/pumpers. The groundwater allocation backstop may be ended when the triggering conditions are resolved.

7.4 Additional Monitoring and Reporting Requirements

Annual pumping measurements should be reported to the CDMGSA within two weeks of collection. All data reported should also be imported into the Basin DMS by the respective member agencies.

7.5 Enforcement

Enforcement of the groundwater allocation backstop is governed by the dispute resolution mechanisms in the Basin GSA's MOA.