Tule Lake Subbasin

Groundwater Sustainability Plan

Periodic Evaluation

DRAFT

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List of Acronyms and Abbreviations

1902 Act	1902 Reclamation Act	MOU	Memorandum of Understanding
2017 Standard Criteria	Water Management Plan 2017 Standard Criteria	MT	Minimum Threshold
AB	Assembly Bill	NCCAG	Natural Communities Commonly Associated with Groundwater
AEM	Airborne Electromagnetic	NGS	National Geodetic Survey
BGS	Below Ground Surface	NOI	Notice of Intent
BMP	Best Management Practices	PWS	Public Water System
CASGEM	California Statewide Groundwater Elevation Monitoring	Reclamation	U.S. Bureau of Reclamation
CDFW	California Department of Fish and Wildlife	SB	Senate Bill
Core Team	Tulelake Subbasin GSP Core Team	SGMA	Sustainable Groundwater Management Act
DWR	California Department of Water Resources	SMC	Sustainable Management Criteria
ESA	Endangered Species Act	SMCL	Secondary Maximum Containment Level
GAMA	Groundwater Ambient Monitoring and Assessment Program	SNMP	Salt and Nutrient Management Plans
GDE	Groundwater Dependent Ecosystems	SWN	State Well Number
GPS	Global Positioning System	SWRCB	State Water Resources Control Board
GSA	Groundwater Sustainability Agency	TDS	Total Dissolved Solids
GSP or Plan	Groundwater Sustainability Plan	TID	Tulelake Irrigation District
GWMP	Groundwater Management Plan	TLNWR	Tule Lake National Wildlife Refuge
HCM	Hydrogeologic Conceptual Model	TNC	The Nature Conservancy
ILRP	Irrigated Land Regulatory Program	TSS	Technical Support Services
InSAR	Interferometric Synthetic Aperture Radar	UKL	Upper Klamath Lake
KID	Klamath Irrigation District	USGS	U.S. Geological Survey
KPDRA	Klamath Project Drought Response Agency	UTM	Universal Transverse Mercator
KWAPA	Klamath Water and Power Agency	VOC	Volatile Organic Compounds
LKNWR	Lower Klamath National Wildlife Refuge	WDL	Water Data Library
LRDC	Lost River Diversion Channel	WMP	Water Management Plan
MCL	Maximum Containment Level	WUMP	Water User Mitigation Program
MCLG	Maximum Containment Level Goal		

Executive Summary

Introduction

The Tule Lake Subbasin (Subbasin) Groundwater Sustainability Plan (GSP or Plan) was adopted on December 14, 2021, by the four Groundwater Sustainability Agencies (GSAs): the City of Tulelake GSA, Modoc County GSA, Siskiyou County GSA, and the Tulelake Irrigation District GSA. The GSAs were formed in accordance with the Sustainable Groundwater Management Act (SGMA) to prepare and implement the GSP for the Subbasin. The GSP was submitted to the California Department of Water Resources (DWR) on January 31, 2022, consistent with the January 31, 2022, deadline for submission of GSPs by medium-priority basins. On January 18, 2024, DWR transmitted a letter (DWR Letter) to the GSAs which stated that the GSP was found to be "incomplete" and identified two corrective actions relative to minimum thresholds (MTs) established in the GSP. The GSAs resubmitted the revised GSP on July 16, 2024, and the GSAs received a determination letter from DWR identifying that the revised GSP had been approved on February 27, 2025 (referred to as the 2024 GSP).

The Subbasin GSP Periodic Evaluation documents progress in implementing the Subbasin GSP over the first five years of the implementation period, Water Years (WYs) 2021 to 2025; however, 2019 and 2020 were also included since they were not evaluated in the 2024 GSP. This periodic evaluation is accompanied by a GSP Amendment 1(MBK, 2027), which was adopted by the GSAs on DATE. A Notice of Intent to Adopt the Amended GSP was signed by the Plan Manager on behalf of the GSAs and distributed on August 24, 2026, to all the cities and counties within the Subbasin. Opportunities for all stakeholders and interested parties in development of this Periodic Evaluation and GSP Amendment 1 were provided through emails to the interested parties.

As identified above, on February 27, 2025, DWR completed its evaluation of the 2024 GSP and approved the GSP. In the approval letter, nine recommended corrective actions were provided by DWR. The recommended corrective actions are provided below:

- **Recommended Corrective Action 1**- Provide an explanation of how well effects (including domestic, private irrigation, etc.) were determined and how this level of impact was considered when setting minimum thresholds at representative monitoring wells used for irrigation. Provide supporting information for the exclusion criteria used in the groundwater dependent ecosystems identification analysis and clearly describe how the level of impacts to potential groundwater dependent ecosystems, as outlined in the Plan, relates to declining groundwater levels and minimum thresholds.
- **Recommended Corrective Action 2**- Reconcile discrepancies within the Plan to clearly identify the principal aquifers within the Subbasin. Identify all the data gaps in the hydrologic conceptual model as required by the GSP Regulations and establish the necessary plans and timelines to address them.
- **Recommended Corrective Action 3**- Re-evaluate the projected overdraft conditions in the Subbasin and re-evaluate or sufficiently explain the assumptions used to develop the projected water budget estimates. Specifically, the GSAs should examine and sufficiently explain assumptions related to projected surface water availability and how the best available

information and data including the most recent hydrology, water supply, water demand, and land use information was used in the analysis.

- **Recommended Corrective Action 4**- Revise the sustainable management criteria for chronic lowering of groundwater levels, land subsidence, and depletions of interconnected surface water to be based on seasonal low groundwater levels to ensure potential impacts to beneficial uses and users (23 CCR §354.26(b)(3)) are considered.

- **Recommended Corrective Action 5**- Revise the sustainable management criteria for chronic lowering of groundwater levels, land subsidence, and depletions of interconnected surface water to be based on seasonal low groundwater levels to ensure potential impacts to beneficial uses and users are considered. Revise the definition of undesirable results for sustainable management criteria for degraded water quality so that exceedances of minimum thresholds caused by groundwater extraction, whether the GSA has implemented management activities or not, are considered in the assessment of undesirable results in the Subbasin. Revise the definition of undesirable to remove the drought year condition or discuss how degradation during dry periods will be managed as necessary to ensure that adverse water quality conditions are offset during other periods. Establish sustainable management criteria for arsenic based on the current conditions or applicable regulatory standards or provide an explanation why the constituent of concern was excluded given that recent studies document exceedances above the maximum contaminant levels standards in the Subbasin.

- **Recommended Corrective Action 6**- Establish sustainable management criteria for land subsidence for the Subbasin utilizing a monitoring network that directly measures land elevation change such as remote sensing data, survey monuments, or global positioning system stations.

- **Recommended Corrective Action 7**- Identify when and where interconnected surface water reaches are located within the Subbasin with detailed supporting information and quantify the volume, location, and timing of depletions of interconnected surface water. Define what constitutes undesirable results for the depletion of interconnected surface water in the Subbasin. Describe the potential effects on the beneficial uses and users of groundwater, or other potential effects that may occur or are occurring from undesirable results. Consider utilizing the interconnected surface water guidance, as appropriate, when issued by DWR to establish quantifiable minimum thresholds, measurable objectives, and management actions. Continue to fill data gaps, collect additional monitoring data, and implement the current strategy to manage depletions of interconnected surface water and define segments of interconnectivity and timing. Prioritize collaborating and coordinating with local, state, and federal regulatory agencies as well as interested parties to better understand the full suite of beneficial uses and users that may be impacted by pumping induced surface water depletion within the GSA's jurisdictional area.

- **Recommended Corrective Action 8**- Identify the principal aquifer that each chronic lowering of groundwater levels representative monitoring site is screened in and ensure sufficient density of monitoring wells for each principal aquifer. Describe how potential data gaps in the groundwater level monitoring network will be filled to sufficiently monitor impacts to beneficial uses or users of groundwater. Identify the screen and completion depths, and the associated principal

aquifers, of representative monitoring sites for degraded water quality. Describe how potential data gaps in the degraded water quality monitoring network will be filled to sufficiently monitor impacts to beneficial uses or users of groundwater.

- **Recommended Corrective Action 9**- Provide discussion on alternatives for achieving sustainability, given the uncertainty of future surface water availability in the Subbasin. This may include developing a suite of projects and management actions to be implemented as needed to achieve the sustainability goal established for the Subbasin.

Periodic Evaluation Overview

The sustainability goal for the Tule Lake Subbasin is:

> *to ensure that by 2042 the Subbasin is being locally managed and operated in order to maintain a reliable water supply for current and future beneficial uses, without causing undesirable results.*

The sustainability goal for the Tule Lake Subbasin is currently reached through existing local management of groundwater resources driven by local investment in surface water infrastructure, groundwater infrastructure, and management activities. Implementation of the 2024 GSP seeks to maintain this achievement. This Periodic Evaluation serves to demonstrate that the sustainability goal continued to be maintained over the evaluation cycle of WYs 2019 to 2025.

The Tule Lake Subbasin GSAs continued to implement monitoring described in the 2024 GSP, develop Annual Reports which were submitted to DWR April 1st each year, monitor for the need to implement adaptive management strategies, seek funding opportunities to support GSP implementation, and implement projects and management actions (PMAs). Through assessment of monitoring data collected during the evaluation cycle compared to established sustainable management criteria (SMC) for each sustainability indicator, conditions remained sustainable throughout the Tule Lake Subbasin. As part of this Periodic Evaluation, monitoring networks for each sustainability indicator have been modified to incorporate new monitoring sites in order to fill data gaps and remove monitoring sites no longer suitable to improve long term monitoring in support of maintenance of the sustainability goal. Additionally, SMC definitions have been modified where necessary as a result of monitoring network changes to support the assessment of continued sustainability over the next evaluation cycle and beyond.

Over the evaluation cycle, Tule Lake Subbasin GSAs implemented PMAs identified in the 2024 GSP, continued to conduct groundwater management activities, and evaluated new information and data collected to improve characterization of the Tule Lake Subbasin. Significant new information and data acquired over the evaluation cycle was incorporated into the Periodic Evaluation, where appropriate, and include:

- Airborne electromagnetic (AEM) data of the Subbasin collected in 2021 by DWR
- Interferometric Synthetic Aperture Radar (InSAR) data.
- Tule Lake Subbasin Groundwater Model Update

Throughout the development of this Periodic Evaluation, interested parties were encouraged to provide feedback primarily through GSA meetings. A total of XX GSA meetings were held from 2025 to 2026 that included discussion of the Periodic Evaluation. Notice of GSA meetings was provided through the Interested Persons (IP) email list/database, and the meeting agenda and materials were provided ahead of each meeting. Interested parties were also provided an opportunity to comment on the public draft of the Periodic Evaluation which took place from October 23 to November 22, 2024. Provided comments were given consideration and incorporated into the final Periodic Evaluation where appropriate or identified for future evaluation.

1. Introduction and Plan Authority

The Sustainable Groundwater Management Act (SGMA), passed in 2014, requires the formation of local Groundwater Sustainability Agencies (GSAs) to oversee the development and implementation of Groundwater Sustainability Plans (GSPs), with the goal of achieving sustainable management of California's groundwater basins.

The California Department of Water Resources (DWR) designated the Tule Lake Subbasin as a medium-priority basin. Under SGMA, the Subbasin was not identified as critically over drafted and therefore was required to be managed by a GSP by January 31, 2022. Four GSAs were formed within the Tule Lake Subbasin (Subbasin) – the City of Tulelake GSA, Modoc County GSA, Siskiyou County GSA, and the Tulelake Irrigation District GSA – in accordance with the SGMA to prepare and implement the GSP for the Subbasin Figure 1-1 shows the location of the four Tulelake GSAs. In accordance with SGMA requirements, the Tule Lake Subbasin Groundwater Sustainability Plan (GSP or Plan) was adopted on December 14, 2021, by the four GSAs. The GSP was submitted to DWR on January 31, 2022, consistent with the deadline for submission of GSPs by medium-priority basins. Since the submission of the original Tule Lake GSP in 2022, every subsequent year by April 1, an Annual Report has been submitted per SGMA requirements.

DWR reviewed the Subbasin GSP and on January 18, 2024, transmitted a letter (DWR Letter) to the GSAs which stated that the GSP was found to be "incomplete" and identified two corrective actions relative to minimum thresholds (MTs) established in the GSP. The GSAs submitted the revised GSP on July 16, 2024 (2024 GSP). DWR approved the revised GSP in a letter dated February 27, 2025, which included the recommended corrective actions addressed in this Periodic Evaluation.

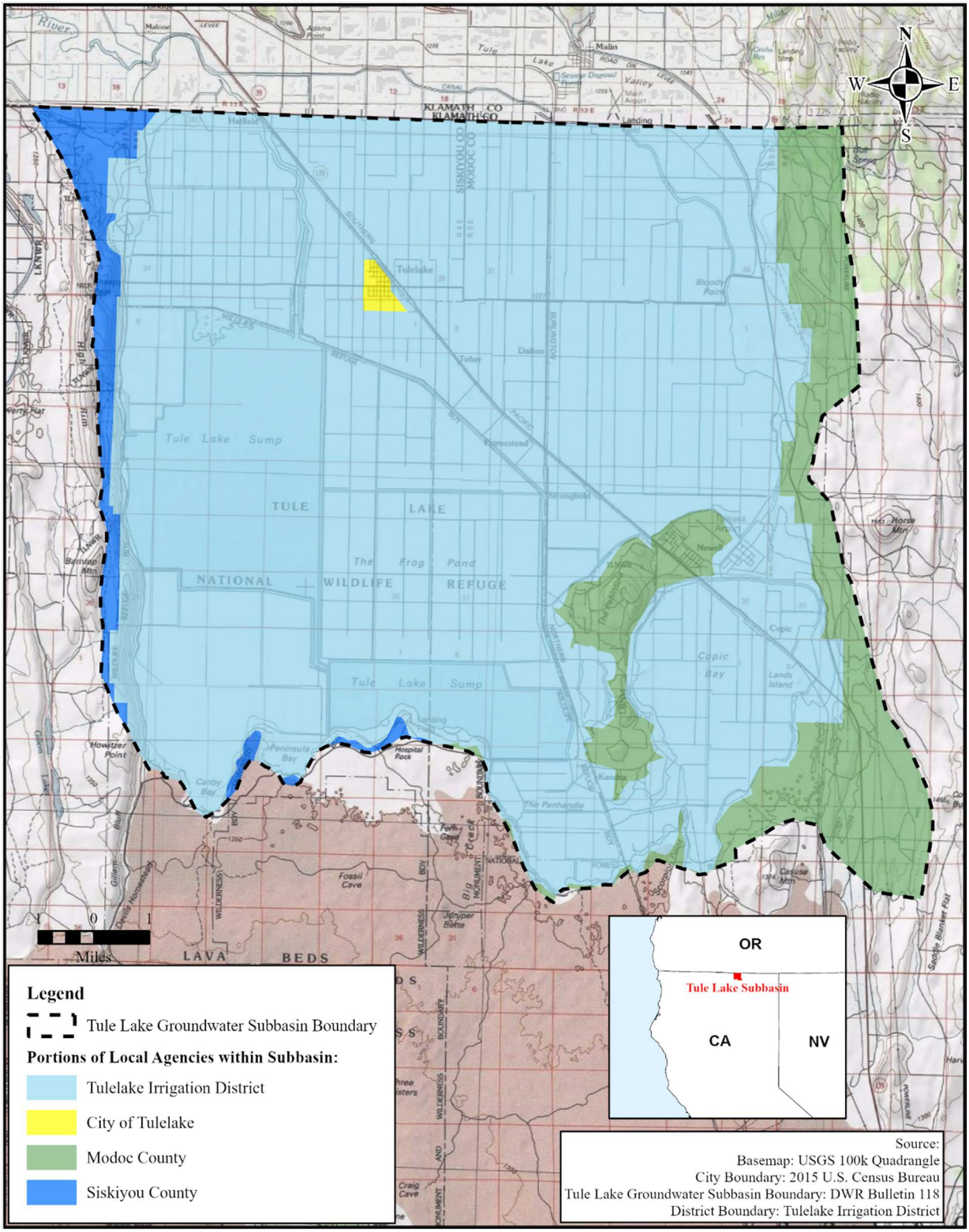


Figure 1-1. Location of the Groundwater Sustainability Agencies within the Tule Lake Subbasin

1.1 Purpose of the Periodic Evaluation

This Periodic Evaluation meets the five-year assessment requirement of the GSP Emergency Regulations §356.4 Periodic Evaluation by Agency and assesses the GSP implementation period for Water Years (WYs) 2019 through 2025. The organization of this Periodic Evaluation adheres to Section 3.3 of the Groundwater Sustainability Plan Implementation: A Guide to Annual Reports, Periodic Evaluations, & Plan Amendments (DWR, 2023b).

The purpose of this Periodic Evaluation is to provide an update to DWR, interested parties, and the public on changing conditions in the Tule Lake Subbasin, the progress the GSAs within the Tule Lake Subbasin have made on implementing the Tule Lake Subbasin GSP, and the need, if any, for an amendment to the GSP. This Periodic Evaluation provides an assessment of the progress made towards maintaining the Subbasins' sustainability goal to maintain a locally managed, economically viable, sustainable groundwater resource for existing and future beneficial use by continuing existing management to maintain operation within the sustainable yield or by modification of existing management to address unforeseen future conditions.

This Periodic Evaluation also provides DWR, interested parties, and the public with the progress the GSAs have made on implementing the GSP. This Periodic Evaluation summarizes and assesses:

- New and significant information
- Groundwater conditions for each applicable sustainability indicator identified in the approved GSP
- Actions taken to address recommended corrective actions issued by DWR in its February 27, 2025, letter
- Actions taken to address suggestions from DWR in its February 27, 2025, letter
- Status of projects and management actions
- Updates to the basin setting
- Monitoring network updates
- The authorities and actions taken by the GSAs during this evaluation cycle

The following is a summary of the proposed recommended corrective actions provided by DWR, as items that DWR believed will enhance the GSP and facilitate future evaluation by DWR.

Recommended Corrective Action 1
Clarify how well impacts to domestic, irrigation, and other uses were evaluated and how those impacts informed minimum thresholds at irrigation monitoring wells. Provide justification for excluding certain groundwater dependent ecosystems and clearly explain how declining groundwater levels relate to ecosystem impacts and minimum thresholds.

Recommended Corrective Action 2
Resolve inconsistencies in the Plan regarding which aquifers are considered principal aquifers. Identify all

data gaps in the hydrologic conceptual model and outline clear plans and timelines to address those gaps.

Recommended Corrective Action 3
Reassess projected overdraft conditions and clearly explain the assumptions used in the water budget. In particular, justify assumptions about future surface water availability using the most current data on hydrology, water supply, demand, and land use.

Recommended Corrective Action 4
Update sustainable management criteria for groundwater levels, land subsidence, and interconnected surface water so they are based on seasonal low groundwater levels, ensuring impacts to beneficial uses and users are properly considered.

Recommended Corrective Action 5
Further revise sustainable management criteria to reflect seasonal low groundwater levels and redefine undesirable results for degraded water quality so all groundwater extraction related exceedances are counted. Remove or justify the drought year exception and establish arsenic criteria based on existing conditions or regulatory standards or explain why arsenic was excluded.

Recommended Corrective Action 6
Develop sustainable management criteria for land subsidence using monitoring methods that directly measure land elevation change, such as remote sensing, survey monuments, or GPS stations.

Recommended Corrective Action 7
Identify and map interconnected surface water reaches and quantify the timing, location, and volume of depletions. Define what constitutes undesirable results, describe impacts to beneficial uses, continue filling data gaps, and coordinate with regulatory agencies and stakeholders to improve management of surface water depletions.

Recommended Corrective Action 8
Identify which principal aquifer each monitoring well represents and ensure adequate monitoring density for all aquifers. Document well construction details and describe how data gaps in groundwater level and water quality monitoring will be addressed.

Recommended Corrective Action 9
Discuss alternative pathways to achieve sustainability given uncertainty in future surface water supplies, including developing a flexible set of projects and management actions that can be implemented as conditions change.

2. New Information Collected

GSP Emergency Regulations §356.4(f) include a requirement that the Periodic Evaluation should include:

> *A description of significant new information that has been made available since Plan adoption or amendment, or the last five-year assessment. The description shall also include whether new information warrants changes to any aspect of the Plan, including the evaluation of the basin setting, measurable objectives, minimum thresholds, or the criteria defining undesirable results.*

This section presents new and significant information acquired since the development of the 2024 GSP. Information deemed new and significant is summarized in Table 2-1.

Table 2-1. Significant Changes Since 2024 GSP

Significant New Information	Description	Aspects of Plan Affected	Warrant Change to Any Aspect of the Plan
InSAR Dataset	DWR published vertical displacement data. This data was used to improve the land subsidence sustainable management criteria.	Sustainable Management Criteria	Yes, see sections 3.3.1.4, 5.2.3, and 5.3.3 of GSP Amendment 1.
Airborne electromagnetic data	DWR published geophysical data. This data was used to improve the geophysical representation in the HCM.	Basin Setting	Yes, see Section 2.2.1.2 & Appendix K of GSP Amendment 1
Tule Lake Subbasin Groundwater Model Update	Groundwater level monitoring, groundwater quality monitoring, Airborne electromagnetic (AEM) surveys, and other efforts and data that have been conducted by and obtained by the GSAs have been utilized to gain a better understanding of the Subbasin and to revise the model.	Basin Setting	Yes, see section 2.2.1 & Appendix K of GSP Amendment 1.

3. Groundwater Conditions Relative to Sustainable Management Criteria

GSP Emergency Regulations §356.4(a) state the Periodic Evaluation shall include:

> *A description of current groundwater conditions for each applicable sustainability indicator relative to measurable objectives, interim milestones and minimum thresholds.*

Table 3-1 summarizes the sustainable management criteria (SMC) for each applicable sustainability indicator. The following subsections are organized by sustainability indicator and evaluate conditions over the evaluation cycle for this Periodic Evaluation (WYs 2019 to 2025). Each sustainability indicator is evaluated relative to the SMC established in the GSP and/or GSP Amendment 1.

Table 3-1. Summary of Sustainable Management Criteria

Sustainability Indicator	Undesirable Results	Identification of Undesirable Results	Measurable Objectives and Interim Milestones	Minimum Threshold
Chronic lowering of groundwater levels	The undesirable result of the chronic lowering of groundwater levels is a result that would cause significant and unreasonable impacts to beneficial uses and users of groundwater over the implementation period of the GSP.	Groundwater elevations dropping below the Minimum Threshold criteria at four representative monitoring locations over two consecutive fall measurements.	Groundwater level measurable objectives are based on average spring groundwater levels from 2015 to 2020.	1.Representative monitoring wells that are used for irrigation have MTs set to the well's lowest static groundwater level measurement recorded plus a 10 percent buffer, based on the depth of water below ground surface. 2. The "Near" function in ArcGIS Pro software was used to associate each WCR with the closest representative monitoring well. All representative monitoring wells that are not an irrigation well have MTs set to either the shallowest or second shallowest well within its Near grouping. However, if there are not any wells within a representative monitoring well's Near grouping, then the MT is equal to the well's lowest static groundwater level measurement recorded plus a 10 percent buffer.
Reduction in groundwater storage	The undesirable result of the reduction in groundwater storage is a result that would cause significant and unreasonable impacts to beneficial uses and users of groundwater over the implementation period of the GSP.	Groundwater elevations are used as a proxy for reduction in groundwater storage. Therefore, the identification of undesirable results for chronic lowering of groundwater levels are identical to the identification of undesirable results for reduction in groundwater storage.	Groundwater elevations are used as a proxy for changes in groundwater storage. Therefore, the MOs and IMs for chronic lowering of groundwater levels are identical to the MOs and IMs for reduction in groundwater storage.	Groundwater elevations are used as a proxy for reduction in groundwater storage. Therefore, the MTs for chronic lowering of groundwater levels are identical to the MTs for reduction in groundwater storage.

Sustainability Indicator	Undesirable Results	Identification of Undesirable Results	Measurable Objectives and Interim Milestones	Minimum Threshold
Seawater intrusion	Undesirable results related to seawater intrusion are not present and are not likely to occur in the Subbasin.	Undesirable results related to seawater intrusion are not present and are not likely to occur in the Subbasin.	Measurable objectives are not developed because undesirable results related to seawater intrusion are not present and are not likely to occur in the Subbasin.	Measurable objectives are not developed because undesirable results related to seawater intrusion are not present and are not likely to occur in the Subbasin.
Degraded water quality	The undesirable result of degraded water quality is a result of groundwater management activities (such as groundwater extraction and groundwater recharge) and groundwater quality that cause significant and unreasonable reductions in the long-term viability of domestic, agricultural, municipal, and environmental uses over the planning and implementation horizon of this GSP.	Undesirable result are identified when water quality data measured in at least 50% of representative monitoring wells exceeds the minimum thresholds for a groundwater quality constituent for two consecutive measurements at each location.	The MOs are established based on the average of measurements obtained for the groundwater quality constituents since 2015.	The MTs for nitrate, TDS and arsenic have been set equal to 10% less than the federal and/or state established goals. The MTs are 9 mg/L, 1000 mg/L and 9 µg/L for nitrate, TDS and arsenic, respectively.
Land subsidence	The undesirable result of land subsidence is a result of groundwater extraction that would cause significant and unreasonable impacts to infrastructure, including water conveyance facilities, over the implementation period of the GSP.	Undesirable results are identified as exceeding the minimum threshold within 5 square miles.	0.25 feet of subsidence per 5-year period, within 5 square miles. While this rate is small, it exceeds the accuracy limitations of the InSAR dataset.	0.5 feet of subsidence per 5-year period, this rate is unlikely to cause significant or unreasonable impacts
Depletions of interconnected surface water	The undesirable result of the depletions of interconnected surface water is a result that	Identification of undesirable results for depletions of interconnected surface water are defined as	Groundwater elevations are used as a proxy for depletions of interconnected surface	Groundwater elevations are used as a proxy for reduction in groundwater storage. Therefore,

Sustainability Indicator	Undesirable Results	Identification of Undesirable Results	Measurable Objectives and Interim Milestones	Minimum Threshold
	would cause significant and unreasonable impacts to beneficial uses and users of groundwater over the implementation period of the GSP.	groundwater elevations dropping below the MT criteria at 48N04E22M001M, a representative monitoring location located next to the Lost River, over two consecutive fall measurements.	water. Therefore, the MOs & IMs for chronic lowering of groundwater levels are identical to the MOs & IMs for depletions of interconnected surface water.	the MTs for chronic lowering of groundwater levels are identical to the MTs for depletions of interconnected surface water.

3.1 Chronic Lowering of Groundwater Levels

The following sections contain a summary of any corrective action related to this sustainability indicator and how it is being addressed, a summary of if minimum thresholds were met, any undesirable results that may have occurred and an evaluation of any progress made.

3.1.1 Summary of Responses to Recommended Corrective Actions

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 1a that:

> *"Provide an explanation of how well effects (including domestic, private irrigation, etc.) were determined and how this level of impact was considered when setting minimum thresholds at representative monitoring wells used for irrigation."*

In response to Recommended Corrective Action 1a, the GSAs have provided additional description to Section 5.2.1.2 of GSP Amendment 1 to clarify the analysis performed by the GSAs to understand potential levels of impact when setting MTs at representative monitoring wells used for irrigation.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 1b that:

> *"Provide supporting information for the exclusion criteria used in the groundwater dependent ecosystems identification analysis and clearly describe how the level of impacts to potential groundwater dependent ecosystems, as outlined in the Plan, relates to declining groundwater levels and minimum thresholds."*

In response to Recommended Corrective Action 1b, the GSAs have provided additional description to Section 2.2.2.9 and Section 5.3.1.2 of GSP Amendment 1 about the chronic lowering of groundwater level sustainable management criteria to clarify that identification of undesirable results and minimum thresholds are set at a level that will prevent a negative impact on all beneficial uses and users, including GDEs.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 4 that:

> *"Revise the sustainable management criteria for chronic lowering of groundwater levels, land subsidence, and depletions of interconnected surface water to be based on seasonal low groundwater levels to ensure potential impacts to beneficial uses and users are considered."*

In response to Recommended Corrective Action 4 the GSAs revised the evaluation of sustainable management criteria for chronic lowering of groundwater levels to be based on two consecutive fall measurements. These updates can be found in Section 5.2.1.3 of GSP Amendment 1.

3.1.2 Summary of Groundwater Conditions

Conditions relative to representative monitoring data collected during the evaluation cycle (WYs 2019 to 2025) compared to quantitative SMC are described below. As noted in the WYs 2021 (including 2019-2020) to 2025 Annual Reports for the Tule Lake Subbasin, conditions over this evaluation cycle were sustainable for the chronic lowering of groundwater levels sustainability indicator. A summary of

conditions over the evaluation cycle compared to each threshold showing the total number of wells at or above each threshold by water year is shown in Table 3-2.

Table 3-2. Summary of Conditions Over the Evaluation Cycle

State Well Number	Historic Low[1]	Min. Domestic Well Depth	Minimum Threshold	Measurable Objective	WY 2019 GW Measurement	WY 2020 GW Measurement	WY 2021 GW Measurement	WY 2022 GW Measurement	WY 2023 GW Measurement	WY 2024 GW Measurement	WY 2025 GW Measurement
48N05E35F001M	11	29	29	8	7.8	7.6	8.7	11.3	9.2	8.7	9.3
48N04E22M001M	29	120	120	15	14.7	14.6	-	17.5	17.5	19.0	18.8
48N04E31M001M	31	29	29	23	18.6	17.4	-[2]	-	-	-	-
48N04E19C001M	15	28	28	11	9.5	7.6	-	14.0	14.5	11.5	10.3
47N05E04M001M	10	33	33	9	8.3	8.1	9.5	12.8	10.2	9.5	9.4[3]
47N05E01N001M	22	42	42	15	13.5	12.4	-	18.2	17.2	14.7	15.2
46N05E21J001M	12	32	32	10	6.3	-[4]	6.0	9.0	5.6	7.5	5.8
46N05E01P001M	13	24	24	11	6.5	6.6	6.2	9.8	8.2	10.5	13.6
41S12E19Q001W	14	50	50	6	-[5]	6.3	-	8.0	7.1	6.2	6.9
48N04E30F002M (TID Well 1)	72	-	79	38	39.8	36.4	51.5	66.8	71.7	52.1	48.3
48N04E13K001M (TID Well 5)	82	-	90	42	46.28	42.4	59.3	75.9	81.7	57.2	54.5
48N05E26D001M (TID Well 8)	67	-	74	48	48.11	45.2	52.5	57.9	63.4	58.3	57.6
46N05E22D001M (TID Well 14)	48	-	54	40	39.9	37.3	39.9	45.2	48.2	47.7	46.7
TL-T1 Q3B	31	-	35	27	25.1	19.9	26.6	28.5	28.6	27.4	27.2
TL-T3 GP	14	-	16	12	12.6	11.3	14.7	13.8	15.7	15.3	13.2

Footnotes:
1 Historic low recorded prior to 2022.
2 Measurement discontinued on 5/20/2020 for Well 48N04E31M001M due to the well being caved in.
3 Measurement discontinued on 2/12/2025 for Well 47N05E04M001M due to the well being destroyed.
4 No measurement at 46N05E21J001M on 10/25/2018 (fall measurement) due to a beehive in the well.
5 No measurement at 41S12E19Q001W on 10/30/2018 (fall measurement) due to a winter cover on the well.

Notes:

- GW Measurements are a fall groundwater level measurement, in October.
- All measurements reported in feet below ground surface.
- Minimum threshold exceedances are noted in **bold** text.
- Measurable Objective exceedances are noted in underlined text.
- Measurements missing in CY 2020 were due to domestic wells not being monitored during COVID-19 (Shelter in Place).

3.1.3 Evaluation of Groundwater Conditions

Adaptive management is triggered by a minimum threshold exceedance at a single representative monitoring location. If a minimum threshold exceedance is observed at a single location the GSAs will determine if additional monitoring is needed to understand the exceedance and if additional actions are needed to ensure groundwater levels recover at or above the minimum threshold. This adaptive management strategy reflects proactive water management in the Tule Lake Subbasin to prevent approaching minimum thresholds. During the evaluation cycle the adaptive management strategy did not need to be utilized.

Interim milestones and Measurable Objectives are equivalent for chronic lowering of groundwater levels and are set using average spring water levels for 2015 through 2020. The Tule Lake Subbasin documented 59 exceedances of the Interim Milestones/Measurable Objective (IM/MO) in the evaluation cycle. The Tule Lake Subbasin documented 0 exceedances of the MT in the evaluation cycle.

Undesirable results are not currently occurring and have not occurred over the evaluation cycle, an undesirable result is identified as groundwater elevations dropping below the MT criteria at four representative monitoring locations over two consecutive fall measurements.

GSP implementation relative to the chronic lowering of groundwater levels sustainability indicator has been effective thus far due to proactive conjunctive water management in the Tule Lake Subbasin. The GSAs are not aware of any reports over the evaluation cycle of subbasin conditions and GSP implementation affecting beneficial uses and users of water. Due to dry conditions observed throughout the Subbasin between WYs 2020 and 2022 dry wells have been reported through DWR's reporting portal[1]. The figure below shows the location of each dry well report. The GSAs have added a management action since the implementation of the 2024 GSP to address these issues. Additionally, the GSAs are not aware of any evidence to suggest conditions related to the chronic lowering of groundwater levels sustainability indicators is negatively impacting other sustainability indicators.

[1] https://mydrywell.water.ca.gov/report/

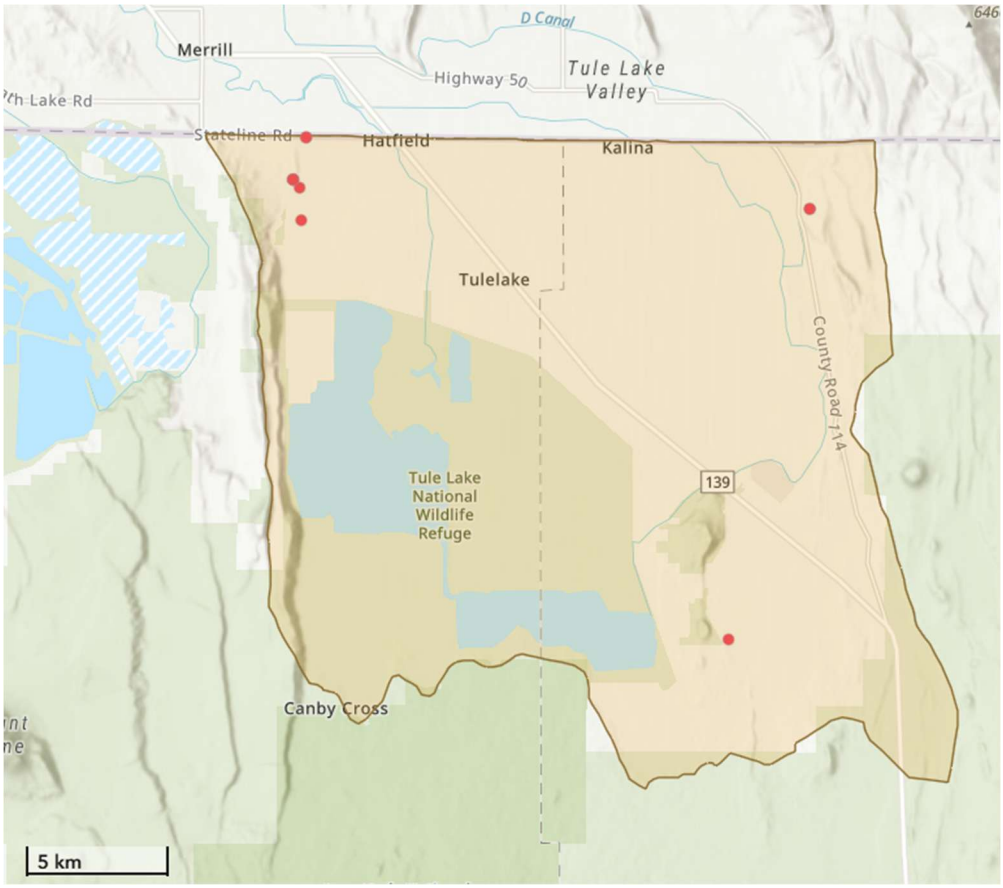


Figure 3-1. Location of Each Dry Well Report

Table 3-3. Locations of Reported Dry Wells in the Subbasin 2014-2025

Report ID	Report Date	Latitude	Longitude
10908[1]	7/11/2021	41.97587	-121.343
10578[2]	6/17/2021	41.98506	-121.561
10869[2]	7/7/2021	41.98505	-121.561
10910[3]	7/11/2021	41.99829	-121.556
11925	10/23/2021	41.98237	-121.559
12247[2]	1/7/2022	41.98505	-121.561
12713[2]	3/31/2022	41.98505	-121.561
19927	6/29/2022	41.97202	-121.559
19349[3]	4/25/2022	41.99829	-121.556
10909[1]	7/11/2021	41.97587	-121.343
741[4]	4/16/2014	41.64843	-121.278
737[4]	4//21/2014	41.84061	-121.377

[1] Reports 10908 and 10909 appear to be the same well.
[2] Reports 10578, 10869, 12247, and 12713 appear to be the same well.
[3] Reports 10910 and 19349 appear to be the same well.
[4] Reports 741 and 737 were submitted before SGMA went into effect and are therefore outside the scope of GSP implementation.

DWR staff suggested the GSAs should clarify how the ten percent buffer is defined when establishing minimum thresholds. Additional description has been provided in Section 5.3.1.2 of GSP Amendment 1 clarifying that the ten percent buffer is based on feet below ground surface.

3.2 Reduction of Groundwater Storage

DWR staff suggested that the GSAs clarify which sustainable management criteria established for the chronic lowering of groundwater levels also apply to the reduction in groundwater storage. Based on hydrogeologic principles applicable to the Subbasin, groundwater levels are directly proportional to groundwater volumes. As a result, potential effects of undesirable results for reduction of groundwater storage would be equivalent to those for the chronic lowering of groundwater levels sustainability indicator. Consistent with this relationship, minimum thresholds, interim milestones and measurable objectives are equivalent for chronic lowering of groundwater levels and reduction in groundwater storage. See Sections 3.4.1 and 3.4.2 for a summary and evaluation of groundwater conditions.

3.3 Seawater Intrusion

Seawater intrusion is not an applicable sustainability indicator, because seawater intrusion is not present and is not likely to occur in the Tule Lake Subbasin.

3.4 Degraded Water Quality

The following sections contain a summary of any corrective action related to this sustainability indicator and how it is being addressed, a summary of if minimum thresholds were met, any undesirable results that may have occurred and an evaluation of any progress made.

3.4.1 Summary of Responses to Recommended Corrective Actions

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 5a that:

> *"Revise the definition of undesirable results for sustainable management criteria for degraded water quality so that exceedances of minimum thresholds caused by groundwater extraction, whether the GSA has implemented management activities or not, are considered in the assessment of undesirable results in the Subbasin."*

In response to Recommended Corrective Action 5a the GSAs have revised the identification of undesirable results to be based on minimum threshold exceedances caused by groundwater extraction. This revised definition can be found in GSP Amendment 1 section 5.2.5.3.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 5b that:

> *"Revise the definition of undesirable results to remove the drought year condition or discuss how degradation during dry periods will be managed as necessary to ensure that adverse water quality conditions are offset during other periods."*

In response to Recommended Corrective Action 5b the GSAs have removed the drought year condition from the identification of undesirable results for degraded water quality. This can be found in GSP Amendment 1, section 5.2.5.3.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 5c that:

> *"Establish sustainable management criteria for arsenic based on the current conditions or applicable regulatory standards or provide an explanation why the constituent of concern was excluded given that recent studies document exceedances above the maximum contaminant levels standards in the Subbasin."*

In response to Recommended Corrective Action 5c the MOs for arsenic are established based on the average of measurements obtained for the groundwater quality constituents since 2015. The MTs for arsenic have been set equal to 10% less than the federal and/or state established goals. Undesirable results are identified under the same conditions as the other groundwater quality constituents.

3.4.2 Evaluation of Groundwater Quality Conditions

There was one minimum threshold exceedance for arsenic during the evaluation cycle. Due to this exceedance MOs and MTs were discussed with Newell County Water District, and its licensed operator, and it is the GSAs understanding that adaptive management strategies have been implemented. These strategies include the utilization of both water supply wells in Newell. The two wells are operated in tandem to mitigate the levels of arsenic in the water supply. The Newell County Water District continues to conduct water quality sampling; however, no further action is being taken at this time. No other minimum threshold has been exceeded regarding water quality constituents during the evaluation cycle. A summary of water quality conditions over the most recent monitoring data compared to the minimum threshold is shown in Table 3-4.

Undesirable results are not currently occurring and have not occurred over the evaluation cycle, where an undesirable result is identified to occur when water quality data measured in at least 50% of representative monitoring wells exceeding the minimum thresholds for a groundwater quality constituent for two consecutive measurements at each location.

The GSAs are not aware of any reports of Subbasin conditions and GSP implementation affecting beneficial uses and users of water relative to the degraded water quality sustainability indicator.

Table 3-4. Water Quality by Well Location

WQ Monitoring Well	Nitrate (mg/L)			Total Dissolved Solids (mg/L)			Arsenic (µg/L)		
	MO	MT	Measurement (Date)	MO	MT	Measurement (Date)	MO	MT	Measurement (Date)
TULELAKE WELL 03	2	9	ND (4/21/2021)	205	900	200 (8/26/2024)	2	9	< 2 (4/21/2021)
TULELAKE WELL 01	2	9	ND (12/17/2015)	190	900	190 (10/31/2018)	2	9	< 2 (12/17/2025)
KBNWR WELL 01	2	9	ND (6/6/2023)	n/a	900	n/a	2	9	n/a
NEWELL WELL 01	2	9	ND (10/14/2025)	540	900	540 (12/19/2017)	9	9	9.5 (9/18/2024)
NEWELL WELL 03	2	9	ND (10/14/2025)	610	900	610 (12/19/2017)	3	9	2.83 (10/10/2023)

Note: ND = Not Detected

3.5 Land Subsidence

The following sections contain a summary of any corrective action related to this sustainability indicator and how it is being addressed, a summary of if minimum thresholds were met, any undesirable results that may have occurred and an evaluation of any progress made.

3.5.1 Summary of Responses to Recommended Corrective Actions

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 4 that:

> *"Revise the sustainable management criteria for chronic lowering of groundwater levels, land subsidence, and depletions of interconnected surface water to be based on seasonal low groundwater levels to ensure potential impacts to beneficial uses and users are considered."*

Recommended Corrective Action 4 is no longer applicable because based on Recommended Corrective Action 6, as described below, the monitoring network no longer relies on groundwater levels as a proxy to understand vertical displacement.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 6 that:

> *"Establish sustainable management criteria for land subsidence for the Subbasin utilizing a monitoring network that directly measures land elevation change such as remote sensing data, survey monuments, or global positioning system stations."*

In response to Recommended Corrective Action 6, the GSAs used the InSAR dataset to develop updated sustainable management criteria and monitor vertical displacement within the Subbasin. In addition to the updated monitoring network the identification of MTs for land subsidence have been updated. The MT is defined as 0.5 foot in a five-year period. Undesirable results are identified as exceeding the minimum threshold within 5 square miles.

3.5.2 Evaluation of Land Subsidence Conditions

There were no minimum threshold exceedances that constituted undesirable results over the evaluation cycle. There have been no reports of basin conditions and GSP implementation affecting beneficial uses and users of water or critical infrastructure relative to the land subsidence sustainability indicator. There is no evidence to suggest conditions related to the land subsidence sustainability indicators are negatively impacting other sustainability indicators. The newly established sustainable management criteria related to land subsidence will be evaluated in annual reports.

3.6 Depletions of Interconnected Surface Water

The following sections contain a summary of any corrective action related to this sustainability indicator and how it is being addressed, a summary of if minimum thresholds were met, any undesirable results that may have occurred and an evaluation of any progress made.

3.6.1 Summary of Responses to Recommended Corrective Actions

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 4 that:

> *"Revise the sustainable management criteria for chronic lowering of groundwater levels, land subsidence, and depletions of interconnected surface water to be based on seasonal low groundwater levels to ensure potential impacts to beneficial uses and users are considered."*

In response to Recommended Corrective Action 4 the GSA revised the identification for undesirable results for depletions of interconnected surface water has been updated to be dropping below the MT at the representative monitoring location, monitoring well 48N04E22M001M, over two consecutive fall measurements. Groundwater levels are used as a proxy metric for depletions of interconnected surface water, unless otherwise stated the sustainable management criteria for chronic lowering of groundwater levels are equivalent to those for depletions of interconnected surface water.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 7a that GSAs should work to:

> *"Identify when and where interconnected surface water reaches are located within the Subbasin with detailed supporting information and quantify the volume, location, and timing of depletions of interconnected surface water."*

In response to Recommended Corrective Action 7a the GSAs have identified that the Tule Lake Sumps and Lost River Improved Channel are potential interconnected surface water features. A preliminary analysis of interconnected surface waters is included in Appendix O of GSP Amendment 1, but this is based on data from the GSP Model which is a limited representation of a large and complex physical system.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 7b that GSAs should work to:

> *"Define what constitutes undesirable results for the depletion of interconnected surface water in the Subbasin. Describe the potential effects on the beneficial uses and users of groundwater, or other potential effects that may occur or are occurring from undesirable results."*

In response to Recommended Corrective Action 7b the GSAs identified potential effects to beneficial uses and users in Section 5.2.4.2 of GSP Amendment 1.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 7c that GSAs should work to:

> *"Consider utilizing the interconnected surface water guidance, as appropriate, when issued by the [DWR] to establish quantifiable minimum thresholds, measurable objectives, and management actions."*

In response to Recommended Corrective Action 7c the GSAs have reviewed the three-paper series on interconnected surface water by DWR. It is the GSAs understanding that additional information, including a guidance document, will be released by DWR. Once released, the GSAs will incorporate the guidance as appropriate and applicable into the GSP. Preliminary analysis by the GSAs of interconnected

surface waters in the Subbasin can be reviewed in Appendix O of GSP Amendment 1. The analysis utilizes data from the GSP Model; therefore, it is data based on a numerical representation of the Subbasin and may not accurately reflect actual conditions in the Subbasin.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 7d that GSAs should work to:

> *"Continue to fill data gaps, collect additional monitoring data, and implement the current strategy to manage depletions of interconnected surface water and define segments of interconnectivity and timing"*

In response to Recommended Corrective Action 7d the GSAs have completed a preliminary analysis of interconnected surface waters in the Subbasin, which is included in Appendix O of GSP Amendment 1.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 7e that GSAs should work to:

> *"Prioritize collaborating and coordinating with local, state, and federal regulatory agencies as well as interested parties to better understand the full suite of beneficial uses and users that may be impacted by pumping induced surface water depletion within the GSA's jurisdictional area."*

In response to Recommended Corrective Action 7e, regarding interested parties, the GSAs coordinated with OWRD staff prior to updating the GSP in order to obtain relevant data. In addition, the GSAs ensured that OWRD received a copy of the public draft version of the GSP Amendment 1 and this Periodic Evaluation so that they could review and provide comments. Also, on behalf of the GSAs, MBK Engineers is coordinating with local, state, and federal regulatory agencies, as well as other GSAs and their technical staff, on surface water depletion. The preliminary analysis included in Appendix O of GSP Amendment 1 was based on this coordination and will be updated as appropriate once additional guidance from DWR is provided.

3.6.2 Evaluation of Interconnected Surface Water Conditions

There were no minimum threshold exceedances that constituted undesirable results over the evaluation cycle. There have been no reports of basin conditions and GSP implementation affecting beneficial uses and users of water or critical infrastructure relative to the depletions of interconnected surface water sustainability indicator. There is no evidence to suggest conditions related to the depletions of interconnected surface water sustainability indicators are negatively impacting other sustainability indicators. Evaluations to fill data gaps, collect additional monitoring data, establish quantifiable MTs and undesirable results for depletions of interconnected surface water are still ongoing.

3.7 Other Responses to Recommended Corrective Actions & Suggestions

In DWR's letter for Tule Lake Subbasin indicating the Approved status of the Tule Lake Subbasin GSP (issued on February 27, 2025), Recommended Corrective Action 9 was related to alternatives for achieving sustainability:

> "Provide discussion on alternatives for achieving sustainability, given the uncertainty of future surface water availability in the Subbasin. This may include developing a suite of projects and

management actions to be implemented as needed to achieve the sustainability goal established for the Subbasin."

In response to Recommended Corrective Action 9 the GSAs highlighted the efforts by the Klamath Project Drought Response Agency (KPDRA) land idling programs (Programs). The KPDRA was formed in 2018 by water districts in the Klamath Project, including the Tulelake Irrigation District (TID), in response to reduced surface water supply allocations to the Klamath Project. The Programs are administered in the Klamath Project, including the Tule Lake Subbasin. The KPDRA Board of Directors includes a TID representative. In addition, TID staff are often present in KPDRA meetings and assist the KPDRA with verification of information for Program participants within the TID service area. Programs are typically run in years when Klamath Project irrigators do not receive a full surface water supply. Historically, Programs were single year land idling programs; however, in 2026 the KPDRA introduced a five-year land idling program. Federally owned lands, such as the lease lands within TID, are not eligible under these Programs; however, idling within those lands still occurs. Below is a table summarizing KPDRA Program land idling within TID.

Table 3-5. Summary of KPDRA Program Land Idling within TID

Year	TID Idled Acres in a KPDRA Program
2018	5,156
2019[1]	N/A
2020	8,997
2021	13,180
2022	10,588
2023	4,846
2024	6,671
2025[1]	N/A

[1] No Program due to sufficient surface water supply.

The KPDRA, including TID, continues to work with USBR to fund future similar land idling programs.

In DWR's letter for the Tule Lake Subbasin, DWR suggested that the GSAs should clarify whether the Subbasin is isolated or not. The Subbasin is isolated from other Bulletin 118 Groundwater subbasins. This discrepancy has been updated throughout GSP Amendment 1.

In DWR's letter for the Tule Lake Subbasin, DWR suggested that the GSAs should provide a summary of groundwater quality conditions within the Subbasin. A summary of GeoTracker sites and an associated map with where the sites are located within the Subbasin is in Appendix N of GSP Amendment 1.

In DWR's letter for the Tule Lake Subbasin, DWR provided additional suggestions primarily for clarification. Due to time and budget constraints, not all suggestions were not incorporated at this time; however, the GSAs acknowledge these suggestions and have cataloged them for incorporation into future plan amendments and/or periodic evaluations.

4. Status of Projects and Management Actions

GSP Emergency Regulations §356.4(b) include a requirement that the Periodic Evaluation shall include:

> *A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions.*

4.1 Projects and Management Actions

Table 4-1 summarizes the currently planned and implemented projects and management actions (PMAs) in the Tule Lake Subbasin. Since completion and adoption of the 2024 GSP, no PMAs have been added or removed. All PMAs listed in Table 4-1 are to be completed during the period noted in the "Expected Schedule" column. As the Tule Lake Subbasin is currently being sustainably managed, there are no PMAs that are required to achieve sustainability. However, PMAs can assist in enhancing management capability and improving understanding of the groundwater system. Given the nature of the need, most PMAs have been, and will continue to be implemented with an as-needed opportunistic approach, with decisions based on funding availability and identified need at that time. PMAs deemed to have more near-term benefits have been given an estimated, more defined timeframe for implementation.

All PMAs outlined in the original GSP are still relevant and feasible. Given PMAs are to be implemented with an as-needed opportunistic approach, estimated project costs will be developed as the need to implement a particular PMA arises. Many PMAs identified in Table 4-1 are part of ongoing activities conducted by the GSAs for conjunctive management of the Tule Lake Subbasin.

Table 4-1. Project and Management Actions Summary

Project or Management Action Name	Project or Management Action Description	Targeted Sustainability Indicator	Project Status	Expected Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Accrued Benefits at Completion
Perform Well Inventory	Create a more detailed inventory of wells within the Subbasin.	• Chronic lowering of groundwater levels • Reduction of storage • Depletions of interconnected surface waters	Ongoing	Ongoing. The well inventory is updated as new wells are constructed and as existing wells are removed.	A better well inventory allows the GSAs to more effectively assess and protect beneficial uses of groundwater by improving understanding of well locations and uses.	Additional well data helps to set and evaluate sustainable management criteria, aiding in sustainability.
File for well installation application with Technical Support Services (TSS)	The GSAs planned to file an application with TSS for monitoring well installation within the first year of implementation. The GSAs applied for TSS assistance in 2022, this application requests installation of a multi-completion well. The request has not been completed by DWR.	• Chronic lowering of groundwater levels • Reduction of storage • Degraded water quality • Depletions of interconnected surface waters	Ongoing	Unknown. Currently awaiting DWR action on application.	A large monitoring network allows the GSAs to more effectively assess and protect beneficial uses and users of groundwater by improving understanding of well locations and uses.	Additional well data helps to set and evaluate sustainable management criteria, aiding in sustainability.
Add 2 wells to WQ Monitoring Network	The GSAs plan to identify a minimum of two additional wells which will be added to the water quality monitoring network. The GSAs conducted a review	• Degraded water quality	Ongoing	Unknown. Currently awaiting DWR action on application.	A large monitoring network allows the GSAs to more effectively assess and protect beneficial uses of groundwater by improving understanding of	An improved groundwater quality monitoring network ensures sustainable management of the Subbasin.

Project or Management Action Name	Project or Management Action Description	Targeted Sustainability Indicator	Project Status	Expected Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Accrued Benefits at Completion
	of data available on GAMA groundwater information system and were unable to identify additional representative monitoring wells for the Subbasin. However, the DWR TSS application requests installation of a multi-completion well, which once installed will include groundwater quality monitoring. Therefore, once the multi-competition well is installed the GSAs plan to add it to the WQ representative monitoring network.				potential water quality issues.	
Complete field inspections of GDEs	Evaluate areas where groundwater dependent vegetation may be present and analyze the availability of non-groundwater sources.	• Chronic lowering of groundwater levels • Reduction of storage • Depletions of interconnected surface waters	Ongoing	Ongoing. An initial field visit was conducted to areas that were publicly accessible.	Further understanding the correlation between a groundwater dependent ecosystem's health and the depth to groundwater.	Refined identification/mapping of GDEs throughout the Tule Lake Subbasin will reduce any effects on groundwater dependent ecosystems.

Project or Management Action Name	Project or Management Action Description	Targeted Sustainability Indicator	Project Status	Expected Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Accrued Benefits at Completion
Review of the AEM survey data	Evaluate AEM survey data and incorporate into GSP and associated model as appropriate.	• Chronic lowering of groundwater levels • Reduction of groundwater storage • Depletions of interconnected surface waters	Complete	Complete	Improved understanding of subbasin characteristics, which assists with representation in the model.	Improved understanding of subbasin characteristics, which assists with representation in the model.
Recharge via Operation of Station 48	This operation will allow TID to charge irrigation canals and drains with water for recharge purposes and will occur on an annual basis as lower Lost River Improved Channel water flows allow.	• Chronic lowering of groundwater levels • Reduction of storage • Depletions of interconnected surface waters	Ongoing	Continues to be implemented annually	These operations began in Water Year 2022 and have continued since. Evaluation of benefits is ongoing.	Expected to improve groundwater levels, maintain groundwater storage and prevent depletion of interconnected surface waters.
Provide Domestic Well Assistance	For years with low surface water supply, the GSAs will investigate the availability of federal, state, and/or local funding to assist impacted well owners. As identified in this GSP, Modoc County meets the	• Chronic lowering of groundwater levels • Reduction of storage	Ongoing	Continued as needed	Anticipated to mitigate groundwater supply impacts to disadvantaged community well owner by facilitating funding assistance for the deepening or replacement of impacted wells during low surface water supply years. In	Domestic users of groundwater will not be affected by drought or years when the groundwater supply demand is large.

Project or Management Action Name	Project or Management Action Description	Targeted Sustainability Indicator	Project Status	Expected Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Accrued Benefits at Completion
	requirements of a severely disadvantaged community, and Siskiyou County meets the requirements of a disadvantaged community. Therefore, assistance by the GSAs will likely require grant funding. The result of this investigation may include a program that provides temporary water assistance, assists with the deepening or replacement of wells impacted during the implementation period of this GSP.				reviewing DWR's Dry Well Reporting system, it appears that there have not been any dry wells reported since 2022. The GSAs are not aware of any dry well issues experienced since 2022. In addition, the City of Tulelake is currently pursuing funding to begin the process of expanding its service area, which will result in decreased reliance of domestic wells within the Subbasin.	
Adaptive Management Strategy	If minimum thresholds are reached for any sustainability indicator, indicating the conditions in the basin may be causing undesirable results, the GSAs	• Chronic lowering of groundwater levels • Reduction of storage • Degraded water quality	Ongoing/Implemented	Continued as needed	Avoid undesirable results by improving understanding of the practices and conditions that may lead to minimum threshold exceedances. Manage Klamath Project water	Avoid undesirable results by improving understanding of the practices and conditions that may lead to minimum threshold exceedances. Manage Klamath Project water

Project or Management Action Name	Project or Management Action Description	Targeted Sustainability Indicator	Project Status	Expected Schedule	Benefits Observed to Date or Anticipated Benefits	Estimated Accrued Benefits at Completion
	must take actions they determine necessary following exceedance such as, corrective actions, additional studies, or management modifications. The GSAs intend to participate in and seek funding for projects that ensure the Subbasin is sustainably managed.	• Land Subsidence • Depletions of interconnected surface waters			supply shortages without causing groundwater overdraft.	supply shortages without causing groundwater overdraft.

5. Basin Setting Based on New Information or Changes in Water Use

GSP Emergency Regulations §356.4(d) include a requirement that the Periodic Evaluation shall include:

> An evaluation of the basin setting in light of significant new information or changes in water use, and an explanation of any significant changes. If the Agency's evaluation shows that the basin is experiencing overdraft conditions, the Agency shall include an assessment of measures to mitigate that overdraft.

The basin is not in overdraft, therefore there is no assessment of measures to mitigate that overdraft.

5.1 Hydrogeologic Conceptual Model

The hydrogeologic conceptual model (HCM) presented in the 2024 GSP discussed the physical setting, characteristics, and processes that govern groundwater within the Tule Lake Subbasin. This section discusses new information gathered during the evaluation cycle. New data and analyses conducted during this evaluation cycle are described in the following subsections.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Tule Lake Subbasin GSP (issued on February 27, 2025), Recommended Corrective Action 2a was issued related to the hydrogeologic conceptual model:

> *"Reconcile discrepancies within the Plan to clearly identify the principal aquifers within the Subbasin."*

In response to Recommended Corrective Action 2a the GSAs reviewed the AEM data and Geologic Maps to identify two principal aquifers within the Subbasin. The shallow aquifer, or alluvial aquifer extends to 450 feet below ground surface (BGS). The primary deep aquifer extends from about 450 feet BGS to several thousand feet BGS. The bottom of the Subbasin is not well defined due to limitations of the AEM survey. Representative monitoring wells and their respective aquifer can be found in Table 6-1. Sections throughout GSP Amendment 1 have been updated.

In DWR's letter for Tule Lake Subbasin indicating the Approved status of the Tule Lake Subbasin GSP (issued on February 27, 2025), Recommended Corrective Action 2b was issued related to the hydrogeologic conceptual model:

> *"Identify all the data gaps in the hydrologic conceptual model as required by the GSP Regulations and establish the necessary plans and timelines to address them."*

In response to recommended corrective action 2b the GSAs have expanded the HCM section in GSP Amendment 1 Section 2.2.1.7. Data gaps include but are not limited to fault and structural features, aquifer interactions, recharge and discharge quantities and groundwater flow directions. All data gaps identified will be addressed as new data becomes available to the GSAs.

Data from the DWR Statewide AEM Survey Project were used to refine the basin setting information in the GSP Model. AEM flightlines were only available within the Subbasin, with one flightline extending southwest into Lava Beds National Monument. Therefore, the data were used specifically to refine the contact between basin-fill sediments and underlying volcanic rock. The maximum depth of the AEM data was approximately 1,000 feet BGS in the Subbasin; and therefore, the bottom of basin-fill sediments was

not visible. However, although the AEM data did not present the full thickness of the basin-fill sediments, it supported refinement of the depth and geometry of the contact with the underlying volcanic rocks along the Subbasin margins, where the contact resided at shallower depths.

5.2 Groundwater Conditions

The Groundwater Sustainability Plan Implementation: A Guide to Annual Reports, Periodic Evaluations, and Plan Amendments (DWR, 2023b) recommends including a groundwater conditions section in periodic evaluations. Section 1 and all subsections of Section 3 provide detailed summaries of groundwater conditions within the Tule Lake Subbasin.

5.3 Water Use Changes and Associated Water Budget

Water budgets were developed utilizing the GSP Model. Table 5-1 and Table 5-2 show the annual historical water budget results over the evaluation cycle (WYs 2019 through 2025) for the Tule Lake Subbasin[2].

Table 5-1.Water Budget for Tule Lake Subbasin (WYs 2019 - 2025)

Groundwater Budget Term Baseline (TAF)	WY 2025	WY 2024	WY 2023	WY 2022	WY 2021	WY 2020	WY 2019	Average
	Dry	Very Dry	Less Dry	Very Dry	Very Dry	Very Dry	Dry	-
Groundwater Recharge from Precipitation & Applied Water	79	56	30	36	35	43	74	50
Groundwater Recharge from Canal Laterals	76	71	57	20	30	43	49	49
Groundwater Recharge from Tule Lake Sumps	11	12	11	0	7	10	10	9
Groundwater Recharge from Main Canals	74	75	73	59	62	65	61	67
Groundwater Recharge from Lost River	7	6	3	0	4	5	8	5
Subsurface Flow into Subbasin	14	14	16	20	22	19	15	17
Total Inflow	**261**	**234**	**190**	**135**	**160**	**185**	**217**	**197**
Irrigation & M&I Groundwater Pumping	1	2	3	27	31	20	1	12
Private Groundwater Pumping	59	52	45	66	78	56	43	57
Groundwater Discharge to Drains	170	138	87	62	93	124	149	118
Shallow Groundwater Evapotranspiration	3	2	1	1	1	1	2	2
Groundwater Discharge to Tule Lake Sumps	0	0	0	0	0	0	0	0
Groundwater Discharge to Main Canals	0	0	0	0	0	0	0	0
Groundwater Discharge to Lost River	0	0	0	0	0	0	0	0

[2] Additional details regarding the water budgets, including Water Budget Terms presented in this Section, and annual water budgets for the historic, current and projected period are provided in Appendix K of GSP Amendment 1.

Groundwater Budget Term Baseline (TAF)	WY 2025	WY 2024	WY 2023	WY 2022	WY 2021	WY 2020	WY 2019	Average
	Dry	Very Dry	Less Dry	Very Dry	Very Dry	Very Dry	Dry	-
Subsurface Flow Out of Subbasin	12	12	12	18	18	12	8	13
Total Outflow	**245**	**206**	**148**	**174**	**221**	**213**	**203**	**201**
Change in Storage	16	28	42	-39	-61	-28	14	-4

Table 5-2. Land System Water Budget (WYs 2019 - 2025)

Land System Water Budget Term Baseline (TAF)	WY 2025	WY 2024	WY 2023	WY 2022	WY 2021	WY 2020	WY 2019	Average
	Dry	Very Dry	Less Dry	Very Dry	Very Dry	Very Dry	Dry	-
Precipitation	104	75	58	59	55	52	127	76
Applied Water from Purveyor Deliveries	80	84	73	31	25	81	78	65
Applied Groundwater Outside of Purveyor Service Areas	64	56	48	70	82	60	46	61
Shallow Groundwater into the Rootzone	3	2	1	1	1	1	2	1
Total Inflow	**251**	**217**	**180**	**161**	**163**	**194**	**253**	**203**
Runoff to Streams/Canals	18	10	1	4	4	7	14	8
ET of Precipitation	28	30	44	34	31	22	57	35
ET of Shallow Groundwater	3	2	1	1	1	1	2	1
Groundwater Recharge from Precipitation & Applied Water	124	120	103	87	92	120	106	107
Groundwater Recharge from Precipitation and Applied Water	79	56	30	36	35	43	74	50
Total Outflow	**252**	**218**	**179**	**162**	**163**	**193**	**253**	**201**

Table 5-3. Projected Groundwater Budget (WYs 2026 - 2071)

Groundwater Budget Term	Projected Baseline
	WY 2026 - 2071 Avg (TAF)
Groundwater Recharge from Precipitation & Applied Water	56
Groundwater Recharge from Canal Laterals	44
Groundwater Recharge from Tule Lake Sumps	11
Groundwater Recharge from Main Canals	64
Groundwater Recharge from Lost River	9
Subsurface Flow into Subbasin	17
Total Inflow	**201**

Groundwater Budget Term	Projected Baseline
	WY 2026 - 2071 Avg (TAF)
Irrigation & M&I Groundwater Pumping	8
Private Groundwater Pumping	63
Groundwater Discharge to Drains	117
Shallow Groundwater Evapotranspiration	1
Groundwater Discharge to Tule Lake Sumps	0
Groundwater Discharge to Main Canals	0
Groundwater Discharge to Lost River	0
Subsurface Flow Out of Subbasin	12
Total Outflow	**201**
Change in Storage	0

The sustainable yield within the Subbasin is 57,000 AF. Average change in groundwater storage throughout the evaluation cycle was -4 TAF per year and projected change in storage for the period of 2026 through 2071 is 0 TAF. The primary water use within the Subbasin is irrigation, with the largest outflows from the groundwater system being groundwater discharge to drains.

5.3.1 Changes to Land Use and Crop Patterns

Over the evaluation cycle there have not been any substantial changes to land use and cropping patterns within the subbasin. Additional information regarding land use and cropping patterns can be found in GSP Amendment 1 Section 2.1.1.4.

5.3.2 Surface Water Supply Reliability

The projected surface water supply available to the Tule Lake Subbasin has been updated using the most recent version of the Klamath Basin Planning Model (KBPM). The U.S. Bureau of Reclamation (Reclamation) updated the KBPM to support the 2024 Klamath Project Operations Biological Assessment (referred to as 2024 KBPM). To estimate projected surface water supplies for incorporation into the GSP model, results from the 2024 KBPM were used.

Surface water entering the Subbasin at Anderson-Rose Dam is represented as the sum of Klamath Project water diverted at Station 48 and Lost River flows directed to the Tule Lake Subbasin. The 2024 KBPM model period includes water year 1980 through water year 2022. The Tulelake groundwater model historical period includes water year 2000 through water year 2025. For projected surface water supply, the modeled Station 48 flows and Lost River flows from the 2024 KBPM for water years 2000 through 2022 will be used and repeated to obtain a projection through 2071. This same process will be used to project the volume of water leaving the Tule Lake Subbasin through D Plant which is also estimated in the 2024 KBPM.

5.3.3 Updated Water Budget Estimates

Updated water budget estimates are included in Section 5.3 and Appendix K of GSP Amendment 1.

5.3.4 Updates to Sustainable Yield and Changes in Storage

Sustainable yield is the maximum quantity of water, calculated over a base period representative of long-term conditions in the Subbasin and including any temporary surplus, which can be withdrawn annually from a groundwater supply without causing an undesirable result. Using the GSP Model historic conditions for the Subbasin (2000-2025), the sustainable yield has been updated to be 57,000 acre-feet per year.

5.3.5 Overdraft

The Tule Lake Subbasin is not currently or projected to experience overdraft conditions, per the water budget estimates.

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 3 that:

> "Re-evaluate the projected overdraft conditions in the Subbasin and re-evaluate or sufficiently explain the assumptions used to develop the projected water budget estimates. Specifically, the GSAs should examine and sufficiently explain assumptions related to projected surface water availability and how the best available information and data including the most recent hydrology, water supply, water demand, and land use information was used in the analysis."

In response to recommended corrective action 3 the GSAs decided to evaluate the Drier Extreme Warming (DEW) scenario rather than the central tendency for climate change conditions. These altered conditions show minimal changes as compared to the baseline conditions. Projected baseline conditions result in an average change in storage of 0 acre-feet per year and projected baseline with climate change conditions result in an average change in storage of -3 TAF. To establish the projected conditions groundwater pumping rates were repeated based on historical pumping rates from WY 2000 – 2025. Projected private agricultural pumping is calculated by Farm Process Package (FMP) estimates of groundwater pumping requirements based on consumptive use minus the availability of precipitation, shallow groundwater, and surface water supplies to meet the consumptive use. Surface water availability used information from the KBPM. See Appendix K of GSP Amendment 1 for additional information.

5.4 Model Updates

The GSP model has been updated, including the associated documentation which is included in Appendix K of GSP Amendment 1. Details about water budget development are in Sections 4 and 5 of the documentation included in Appendix K of GSP Amendment 1. GSP implementation, groundwater level monitoring, groundwater quality monitoring, AEM surveys, and other efforts and data that have been conducted by and obtained by the GSAs have been utilized to gain a better understanding of the Subbasin and to revise the model.

6. Monitoring Networks

GSP Emergency Regulations §356.4(e) include a requirement that the Periodic Evaluation shall include:

> A description of the monitoring network within the basin, including whether data gaps exist, or if any areas within the basin are represented by data that does not satisfy the requirements of Sections 352.4 and 354.34(c). The description shall include the following:
>
> (1) An assessment of monitoring network function with an analysis of data collected to date, identification of data gaps, and the actions necessary to improve the monitoring network, consistent with the requirements of Section 354.38.
>
> (2) If the Agency identifies data gaps, the Plan shall describe a program for the acquisition of additional data sources, including an estimate of the timing of that acquisition, and for incorporation of newly obtained information into the Plan.
>
> (3) The Plan shall prioritize the installation of new data collection facilities and analysis of new data based on the needs of the basin.

Changes made to the monitoring networks established in the GSP are discussed in this section.

6.1 Summary of Changes to Monitoring Network-Groundwater Levels

In DWR's letter for Tule Lake Subbasin indicating the Approved status of the Tule Lake Subbasin GSP (issued on February 27, 2025), Recommended Corrective Action 8a was issued related to the groundwater monitoring network:

> *"Identify the principal aquifer that each chronic lowering of groundwater levels representative monitoring site is screened in and ensure sufficient density of monitoring wells for each principal aquifer. Describe how potential data gaps in the groundwater level monitoring network will be filled to sufficiently monitor impacts to beneficial uses or users of groundwater. "*

In response to Recommended Corrective Action 8a the GSAs have updated the following table to include the aquifer for the screened depths at each of the representative monitoring wells. A figure with the representative monitoring well and associated aquifer has also been provided.

Table 6-1. Wells Added to Monitoring Network

State Well Number	Well Location		Perforations (ft)		Well Depth	Aquifer	Well Use	Monitoring Agency
	UTM East	UTM North	Top	Bottom				
48N05E35F001M	634950	4646826	25	32	32	Alluvial	Domestic	DWR
48N04E22M001M	623798	4649129	32	135	135	Alluvial	Domestic	DWR
48N04E19C001M	619377	4649996	22	38	38	Alluvial	Domestic	DWR
47N05E01N001M	636509	4643988	49	65	65	Alluvial	Domestic	DWR
46N05E21J001M	632719	4630034	-	-	32	Alluvial	Domestic	DWR
46N05E01P001M	636763	4634300	87	101	101	Alluvial	Domestic	DWR
41S12E19Q001W	627992	4650692	-	-	65	Alluvial	Domestic	DWR
48N04E30F002M (TID Well 1)	619583	4647681	260	700	740	Both[1]	Irrigation	TID
48N04E13K001M (TID Well 5)	628217	4650610	935	1557	1570	Volcanic	Irrigation	TID
48N05E26D001M (TID Well 8)	634823	4648412	1250	1802	1810	Volcanic	Irrigation	TID
46N05E22D001M (TID Well 14)	633266	4630751	114	554	571	Both[1]	Irrigation	TID
TL-T1 Q3B	621062	4632384	-	-	500	Volcanic	Monitoring	TID
TL-T3 GP	627056	4633043	-	-	500	Volcanic	Monitoring	TID

[1]The well has screened depths in the shallow alluvial aquifer and the deeper volcanic aquifer, the volcanic aquifer begins at about 450 feet BGS.

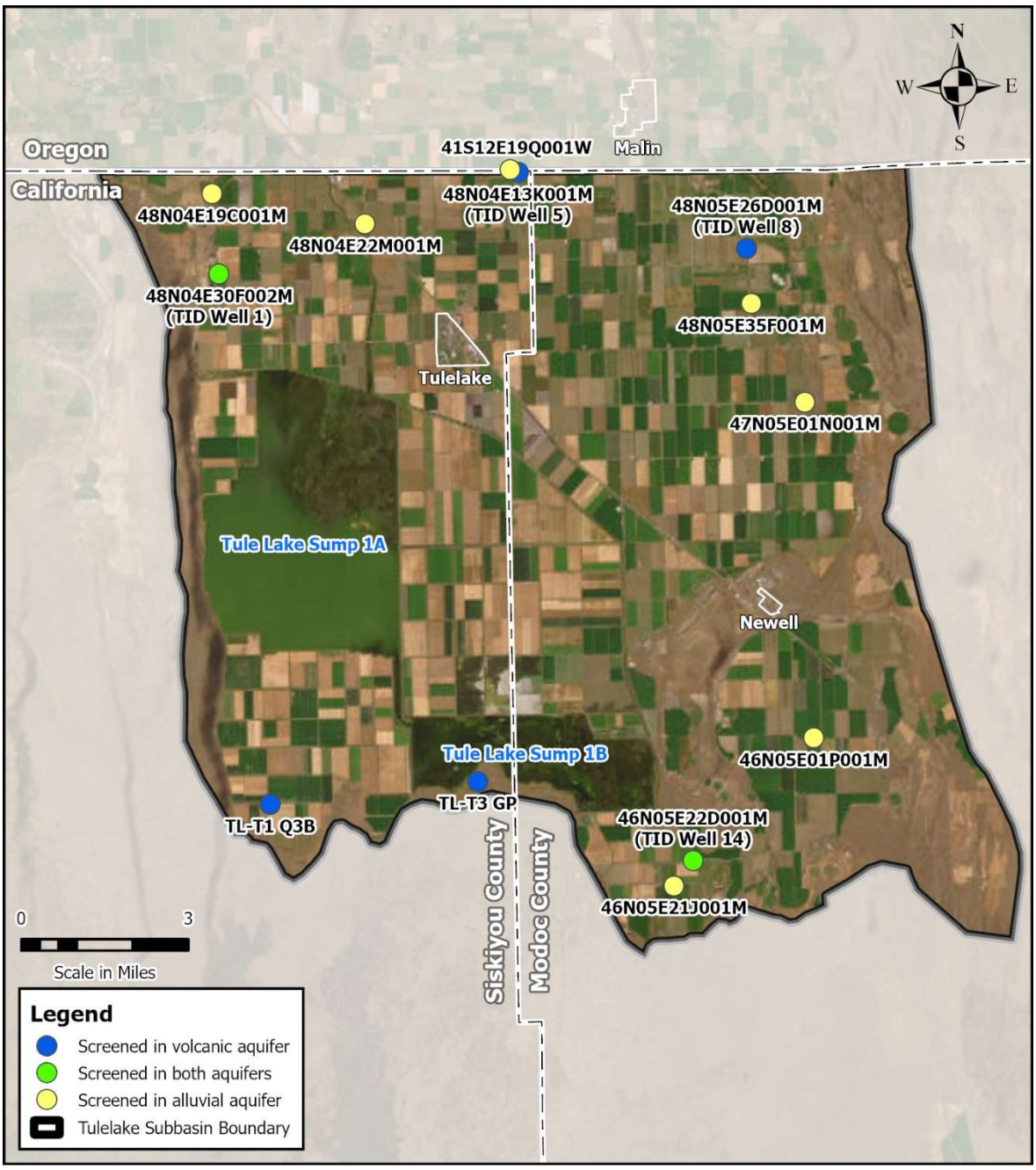


Figure 6-1. Representative Monitoring Well Network

All data gaps regarding the groundwater level monitoring network are still applicable. These data gaps are summarized in GSP Amendment 1 Section 3.3.1.6. While the well density is adequate to meet the best management practices (BMPs) suggested by DWR, when analyzed by aquifer, the volcanic aquifer would benefit from the addition of one well. In 2022 the GSAs applied for assistance in installing a multi-completion well through the TSS program. Once this well is installed both aquifers will have sufficient wells to meet the suggested density for a monitoring network.

6.2 Summary of Changes to Monitoring Network-Degraded Water Quality

In DWR's letter for the Tule Lake Subbasin indicating the Approved status of the Subbasin GSP (issued on February 27, 2025), DWR states as part of Recommended Corrective Action 8b that:

> *"Identify the screen and completion depths, and the associated principal aquifers, of representative monitoring sites for degraded water quality. Describe how potential data gaps in the degraded water quality monitoring network will be filled to sufficiently monitor impacts to beneficial uses or users of groundwater."*

In response to Recommended Corrective Action 8b, the GSAs requested data from the City of Tulelake and the town of Newell. Based on conversations with staff at the City of Tulelake, their two drinking water wells are about 2000 feet deep and are screened in the volcanic aquifer. This is also assumed to be true of the representative monitoring wells in the town of Newell. The representative monitoring well within the KBNWR is about 200 feet deep and screened within the alluvial aquifer. No new data gaps have been identified.

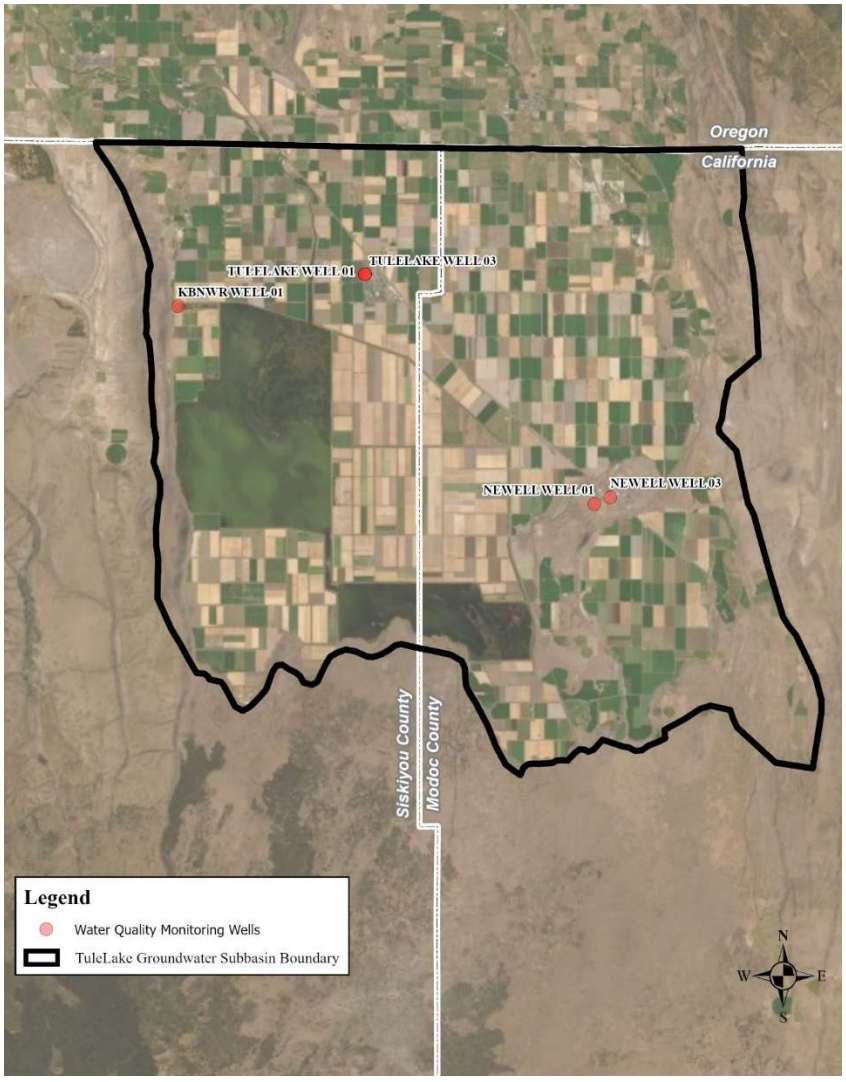


Figure 6- 2. Tule Lake Subbasin Water Quality Monitoring Well Locations

6.2.1 Groundwater Quality Monitoring Network

The GSAs continue to look for additional monitoring locations within the Subbasin, but as of this periodic evaluation no other sites have been identified. However, the DWR TSS application requests installation of a multi-completion well, which once installed will include groundwater quality monitoring. Therefore, once the multi-competition well is installed the GSAs plan to add it to the water quality representative monitoring network.

6.3 Summary of Changes to Monitoring Network-Land Subsidence

In the 2024 GSP the land subsidence monitoring network utilized groundwater levels as a proxy to monitor land subsidence. After receiving the DWR's letter for Tule Lake Subbasin indicating the Approved status of the Tule Lake Subbasin GSP (issued on February 27, 2025), with recommended corrective actions, the GSP was amended to utilize a monitoring network that directly measures vertical displacement. The GSAs elected to utilize the InSAR data set to monitor subsidence within the Subbasin.

6.4 Summary of Changes to Monitoring Network-Interconnected Surface Water

No changes to the depletions of interconnected surface water monitoring network are proposed as part of this Periodic Evaluation. GSAs have reviewed guidance published by DWR and will incorporate new information, as appropriate. Information contained in the 2024 GSP relative to depletions of interconnected surface water monitoring is still applicable and current. The associated monitoring well for the interconnected surface waters sustainable management criteria can be viewed in Figure 6-1.

7. GSA Authorities and Enforcement Actions

GSP Emergency Regulations §356.4 includes additional requirements that the Periodic Evaluation shall include:

> *(g) A description of relevant actions taken by the Agency, including a summary of regulations or ordinances related to the Plan.*
>
> *(h) Information describing any enforcement or legal actions taken by the Agency in furtherance of the sustainability goal for the basin.*

On July 20, 2017, the GSAs entered a Memorandum of Understanding (MOU) to establish the organizational and management structure for development and implementation of the Tule Lake GSP. The authorities of the GSAs are described in Section II of the MOU. During the evaluation period, no changes or revisions were made to the MOU, and no additional regulations or ordinances related to implementation of the GSP were adopted by the GSAs. The GSAs continued to operate under the authorities established in the MOU. No enforcement actions, legal proceedings, or other legal actions were initiated or undertaken by the GSAs during the evaluation period in furtherance of the basin sustainability goal.

8. Outreach Engagement and Coordination with Other Agencies

GSP Emergency Regulations §356.4(j) include a requirement that the Periodic Evaluation should include:

> *Where appropriate, a summary of coordination that occurred between multiple Agencies in a single basin, Agencies in hydrologically connected basins, and land use agencies.*

8.1 Outreach and Engagement

[To be completed once public comment period ends]

8.2 Responsibilities of GSA Boards

Pursuant to the MOU the Tulelake Core Team was established, which is comprised of a representative from each of the Tule Lake Subbasin GSAs. During development of the 2022 GSP, an advisory committee was formed to assist the GSAs with development of the GSP. The Tulelake Core Team holds quarterly public meetings to discuss GSP administration and implementation. Notifications of these meetings are sent to the interested persons list identified in Appendix C of GSP Amendment 1, which includes the advisory committee, agency representatives, and the public.

8.3 Coordination with Other Agencies

As identified above, the Tulelake Core Team holds quarterly public meetings to discuss GSP administration and implementation. Notifications of these meetings are sent to the interested persons list, which includes the advisory committee, agency representatives, and the public. In addition, the GSAs technical staff have coordinated and met with Oregon Water Resources Department (OWRD) staff during the development of GSP Amendment 1. This coordination resulted in OWRD staff providing groundwater monitoring data to the GSAs technical staff for incorporation in the GSP Model. In addition, the GSAs invited OWRD staff to provide comments during the GSP Amendment 1 public comment period.

9. Other information

Below is a summary of other information suggested by the GSP Implementation Guidance Report.

9.1 Consideration of Adjacent Basins

The Subbasin is isolated from Bulletin 118 Groundwater subbasins.

9.2 Challenges Not Previously Discussed

The primary challenge of GSP implementation is that Modoc County meets the requirement of a Severely Disadvantaged Community and Siskiyou County meets the requirements of a Disadvantaged Community. Therefore, the GSAs will likely require grant funding.

9.3 Legal Challenges

There have been no legal challenges or matters involving the GSAs as it relates to the implementation of the GSP. The Subbasin is located within the southeastern region of the Upper Klamath Basin hydrogeologic region. Currently, the Klamath River water rights for the Klamath Project are being adjudicated by the State of Oregon. Additional information regarding the adjudicated areas in the Subbasin can be found in Section 2.1.1.1 of GSP Amendment 1.

10. Summary of Proposed Revisions to Plan Elements

This Periodic evaluation is accompanied by a GSP Amendment 1 to the Tule Lake GSP. Proposed revisions are in response to DWR's letter in response to the Tule Lake Subbasin GSP indicating the Approved status on February 27, 2025. These proposed revisions can be found in sections the redline version of the GSP Amendment 1 on the SGMA Portal.