JOINT MEETING OF CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY SPECIAL BOARD OF DIRECTORS AND STANDING ADVISORY COMMITTEE

Board of Directors

Derek Yurosek Chairperson, Cuyama Basin Water District
Lynn Compton Vice Chairperson, County of San Luis Obispo
Das Williams Santa Barbara County Water Agency
Cory Bantilan Santa Barbara County Water Agency
Glenn Shephard County of Ventura
Zack Scrivner County of Kern
Paul Chounet Cuyama Community Services District
George Cappello Cuyama Basin Water District
Byron Albano Cuyama Basin Water District
Jane Wooster Cuyama Basin Water District
Tom Bracken Cuyama Basin Water District

Standing Advisory Committee

Roberta Jaffe Chairperson
Brenton Kelly Vice Chairperson
Brad DeBranch
Louise Draucker
Jake Furstenfeld
Joe Haslett
Mike Post
Hilda Leticia Valenzuela
Jose Valenzuela

AGENDA

November 6, 2019

Agenda for a meeting of the Cuyama Basin Groundwater Sustainability Agency Board of Directors to be held on Wednesday, November 6, 2019 at 4:00 PM, at the Cuyama Valley High School Cafeteria, 4500 Highway 166, New Cuyama, California 93254. To hear the session live call (888) 222-0475, code: 6375195#.

The order in which agenda items are discussed may be changed to accommodate scheduling or other needs of the Board or Committee, the public, or meeting participants. Members of the public are encouraged to arrive at the commencement of the meeting to ensure that they are present for discussion of all items in which they are interested.

In compliance with the Americans with Disabilities Act, if you need disability-related modifications or accommodations, including auxiliary aids or services, to participate in this meeting, please contact Taylor Blakslee at (661) 477-3385 by 4:00 p.m. on the Friday prior to this meeting. Agenda backup information and any public records provided to the Board after the posting of the agenda for this meeting will be available for public review at 4689 CA-166, New Cuyama, CA 93254. The Cuyama Basin Groundwater Sustainability Agency reserves the right to limit each speaker to three (3) minutes per subject or topic.

1. Call to Order
2. Roll Call
3. Pledge of Allegiance
4. Approval of Minutes
    a. July 10, 2019
    b. August 7, 2019
5. Report of the Standing Advisory Committee

6. Groundwater Sustainability Plan
    a. Agreement between the Cuyama Basin Groundwater Sustainability Agency (CBGSA) and the Cuyama Basin Water District for Administration and Management of the Central Region Management Area of the CBGSA
    b. Adopt a Resolution Designating the CBGSA Board Chairperson as the Authorized Representative to File an Application and Execute an Agreement with the California Department of Water Resources for the Prop 68 Grant Program
    c. Approval of Field Work Locations
7. Groundwater Sustainability Agency
    a. Report of the Executive Director
    b. Progress & Next Steps
    c. Report of the General Counsel
8. Financial Report
    a. Financial Management Overview
    b. Financial Report
    c. Payment of Bills
9. Reports of the Ad Hoc Committees
10. Directors' Forum
11. Public comment for items not on the Agenda

    At this time, the public may address the Board on any item not appearing on the agenda that is within the subject matter jurisdiction of the Board. Persons wishing to address the Board should fill out a comment card and submit it to the Board Chair prior to the meeting.
12. Correspondence
13. Public Hearing – GSP
14. Public Hearing – Groundwater Extraction Fee (6:00 pm)
15. Set a Groundwater Extraction Fee for 2020
16. Adjourn

Cuyama Basin Groundwater Sustainability Agency
Board of Directors

July 10, 2019

Draft Meeting Minutes

Cuyama Valley Family Resource Center, 4689 CA-166, New Cuyama, CA 93254

PRESENT:
Yurosek, Derek – Chair
Compton, Lynn – Vice Chair
Albano, Byron
Anselm, Arne – *Alternate for Glenn Shephard*
Bantilan, Cory
Bracken, Tom
Cappello, George
Chounet, Paul
Christensen, Alan – *Alternate for Zack Scrivner*
Williams, Das *(telephonic)*
Wooster, Jane
Beck, Jim – Executive Director
Hughes, Joe – Legal Counsel

ABSENT:
None

1. **Call to order**
   Chair Derek Yurosek called the meeting to order at 4:00 p.m.

2. **Roll call**
   Hallmark Group Administrative Assistant Melissa Ballard called roll (shown above) and informed Chair Yurosek that there was a quorum of the Board.

3. **Pledge of Allegiance**
   The pledge of allegiance was led by Chair Yurosek.

4. **Approval of Minutes**
   Chair Yurosek opened the floor for comments on the June 5, 2019 CBGSA Board meeting minutes.

   Director Cory Bantilan commented that the minutes incorrectly captured his attendance during the meeting and corrected the motions to read that he was absent.

Director Das Williams arrived at 4:06 pm

MOTION

Director Christensen made a motion to adopt the June 5, 2019 CBGSA Board meeting minutes. The motion was seconded by Director Bracken, and the motion passed with a majority vote.

AYES:	Directors Albano, Bracken, Cappello, Chounet, Christensen, Williams, Wooster, and Yurosek
NOES:	None
ABSTAIN:	Directors Compton, Anselm, and Bantilan
ABSENT:	None

5. Report of the Standing Advisory Committee

Cuyama Basin Groundwater Sustainability Agency (CBGSA) Standing Advisory Committee (SAC) Chair Robbie Jaffe provided a report on the June 27, 2019 SAC meeting, which is provided in the Board packet.

SAC Chair Jaffe provided an overview of the discussions held during the SAC meeting and the recommendations provided by the SAC to the Board.

6. Groundwater Sustainability Plan

a. Groundwater Sustainability Plan Update

Mr. Melton provided an update on the Groundwater Sustainability Plan (GSP) development, which is included in the Board packet.

b. Funding Structure Decision

Mr. Beck provided a summary of the funding structure discussion that occurred at the June 5, 2019 CBGSA Board meeting. He restated that during this meeting Chair Yurosek asked the Directors to consider the funding mechanism presented and to develop ideas on appropriate mechanisms and strategies for collecting the funds necessary to continue to operate the GSA in the future.

Legal counsel Joe Hughes presented an overview on the funding authority, including Water Codes 10730 and 10730.8, and the process for imposing fees through the various options, which included an extraction-based fee, acreage-based fee, and a hybrid approach.

Director Compton asked if there is a plan to exclude de minimis users from being assessed fees. Mr. Beck said the Board will need to determine the qualifications of a de minimis user, and the process for imposing assessments or fees, if any, on these users.

Director Chounet asked if the Community Services District (CSD) in the Kings River East GSA is required to pay the per acre-foot assessment or the flat fee. Mr. Hughes said he is unsure but would research and report back.

Director Wooster recommended performing an economic analysis to review affordable options. Mr. Beck said the cost allocation tool can provide information regarding the impacts to the landowner. He reported that there are funds in the budget allocated for a Prop 218, however if the Board chose to go forward with an extraction fee staff could use those funds for an economic analysis. Mr. Beck reminded the Board that staff is not recommending a particular path.

Walking U Ranch, LLC.'s managing member Kathleen March stated that she owns a 1,000-acre cattle ranch within the Basin that uses minimal groundwater. She said the statutory purpose of GSAs and GSPs is to achieve groundwater sustainability. She believes that the CBGSA should not assess landowners based on acreage because landowners with larger amounts of acreage do not necessarily have a larger water usage. Ms. March stated that the California Constitution requires a Prop 218 election in order to assess a tax based on land ownership and believes the CBGSA would not be successful in passing a Prop 218 election. She said the California Water Code 10730.28 states that a GSA that adopts a GSP may impose fees on the extraction of groundwater from the Basin to fund the costs. She commented that if the CBGSA attempts to assess fees based on acreage without a Prop 218 election, she will file a lawsuit against the CBGSA. Ms. March's correspondence with the GSA is included in the Board packet under Item No. 12.

Director Wooster read the following letter from BAR 3J Ranch's owner John Caufield:

> "Jane,
>
> Due to the earthquake at China Lake I doubt that I will be able to make the meeting on 10 July.
>
> I (and other Division heads) will be reporting back Monday AM with the remainder of my employees returning hopefully mid-week.
>
> Below are my thoughts concerning the fee structure discussed at the board meeting 2 weeks ago.
>
> Note: As per the map dated May 2017, my ranch (BAR 3J) is not located within the Cuyama Basin Water District (CBWD) sphere of influence.
>
> Feel free to use the discussion below as you see fit.
>
> it is my position that the cost recovery schedule for the Cuyama Valley ground water projects should not include non-irrigated land but should be based around irrigated land, wells, and ground water extraction.
>
> I do not believe that it is appropriate to impose a fee, tax, assessment or other charge on non-irrigated land.
>
> The basis for this position is that there are few, if any, actions that could be taken in any given year on non-irrigated land that would impact the valley ground water either positively or negatively.
>
> As such, because there are no meaningful actions to take or monitor; there is nothing to administer. With no administrative costs incurred, there is no basis for cost recovery.
>
> A long-term action that could be taken is the clearing and replacement of natural chaparral with range grass so as to gain the benefit of additional water availability (1) associated with grasses as opposed to native brush.

A cost schedule along these lines would still be problematic:

A. Costs applied to graze lands would be penalizing the landowner for creating the condition in which more water would be available than if the land were in its natural condition.

B. Costs applied to chaparral lands would be penalizing the landowner for leaving the land in its natural condition, which is self-regulating and does not require administration.

C. Bare land is not an acceptable approach (at least away from the valley floor) due to wind and water driven erosion.

Support for my position that cost recovery for the Cuyama Valley ground water projects should be based around irrigated land, wells, and ground water extraction is as follows...

Administering and monitoring of irrigated land and wells is inherent in the ground water plan under consideration. There will be a cost associated with this activity and recovery of that cost is appropriate.

A cost schedule for ground water extract is logical as its incentives conservation and specifically ties value to the resource under consideration.

(1) Aside from being intuitive, several papers from the 1940s-1960s for US Forest Service & California Natural Resources discuss this. Studies were in California and Arizona."

Director Cory Bantilan asked Mr. Hughes if any irrigated land can be considered as de minimis. Mr. Hughes replied that under the Sustainable Groundwater Management Act (SGMA) de minimis users are defined as household or domestic use, however the CBGSA can chose to treat landowners differently within the GSP under the rate settings.

Chair Yurosek asked how landowners with less than two acre-feet are evaluated and Mr. Hughes replied that the basis of evaluation is under the discretion of the Board.

Director Chounet asked if the Cuyama CSD could be considered de minimis because each of the households within the CCSD use less than two acre-feet of water per year. Mr. Hughes replied that each household can be considered de minimis but not the CCSD because the CCSD consists of all those households.

Cuyama Landowner Ann Myhre commented that Salinas Valley did not assess any fees on dry acreage because it would not benefit from SGMA. She is afraid the Basin cannot afford SGMA.

Director Compton believes that landowners who are not using the water should not be paying for it. However, she is unsure if the Board should identify de minimis users using SGMA's definition or dry land. She expressed concern that SGMA may break the Basin.

Director Bantilan asked how water usage will be monitored. Mr. Beck said in his previous experience landowners were responsible for self-reporting with spot checks, which is his recommendation. Mr.Beck commented that the budget for next year assumes self-reporting.

Mr. Beck presented an overview of the CBGSA cost allocation tool. He said the draft budget is strictly for GSA administration, including monitoring and reporting. Mr. Beck commented that this budget assumes no delinquencies, but he expects this may be something the CBGSA would want to consider adding.

Chair Yurosek believes the GSA should use a hybrid approach with a minimal assessment on all acres within the Basin. He believes this would be beneficial to the landowners and the Basin.

Director Bantilan asked Mr. Beck if the budget will get cut over time. Mr. Beck said he believes cost could go down after the first year, however every GSA has the same ongoing implementation costs and model defining/development costs. He said the Board's options are to either pay for the GSP development or have the California State Water Resources Control Board (SWRCB) take over the Basin.

Director Albano said the Board will need legal advice and management to determine what landowners are entitled to pump and the structure of the pumping fees. Chair Yurosek agreed that a mechanism will need to be developed in the future to structure the pumping fees, however that is not currently in the budget.

Director Alan Christensen asked if there is a shortage in the current budget. Mr. Beck replied that in the proposed budget there may be a shortage after January 2020.

Director Bantilan asked if administrative costs to collect the fees are included in the budget and Mr. Beck confirmed.

Ms. March recommended using electric bills to calculate the amount of water being pumped by landowners. She said a hybrid approach would require a Prop 218 election because if the GSA were to charge a fee based on acreage, it would be a property tax.

Landowner Stephanie Menzies said ranchers who own a business within the Basin have a budget and assigning assessments to match the proposed GSA budget is not a sustainable method.

SAC member Louise Draucker believes there should be an extractive fee and the landowners who are not using the water should not bear the costs. She said a lot of people who are not irrigating live on the outskirts of the basin where a lot of rainfall occurs and contributes to the groundwater supply.

Stakeholder Jubel Russell said his cattle ranch uses approximately two acre-feet of water per year and he is willing to pay the rate to keep his rights to pump water.

SAC Chair Jaffe said she agrees with the extraction fee and commented that there needs to be incentives to have the cutbacks take place and a cured approach to take care of the limited users as Ag moves toward the sustainable yield.

Cuyama Valley Family Resources Center Executive Director Lynn Carlisle recommended having a higher rate now and lowering it to offer as an incentive.

Director Compton said we should not operate under the assumption that the cost of water will decrease for landowners due to less usage because there is cost with the infrastructure itself.

Mr. Hughes recommended setting the extraction fee for one year because the budget for the remaining years has not been determined.

Director Chounet requested that staff recommend a flat fee for CCSD the next fiscal year. Mr. Beck said with a motion that is passed staff will present an option on how to handle the CCSD.

MOTION
Director Wooster made a motion that the GSP be funded on a per acre-foot water extraction fee basis for the fiscal year 2019-20 budget and that the Board direct staff to come back to the GSA Board with suggestions on how that extraction fee will be calculated and collected, and the Board will address increases in water use on the currently non-irrigated acreage. The motion was seconded by Director Compton, and the motion passed with a 100% vote.

AYES:	Directors Albano, Anselm, Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Williams, Wooster, and Yurosek
NOES:	None
ABSTAIN:	None
ABSENT:	None

c. Fiscal Year 2019-20 Budget Adoption
Mr. Beck presented an overview of the Fiscal Year 2019-20 budget.

Director Albano said he believes that the steps after the GSP is submitted to the California Department of Water Resources (DWR) can be accomplished on a smaller budget. Mr. Beck said moving forward the bulk of W&C's work is refinement of the model and data collection.

Director Compton asked if counties are expected to apply for grants. Mr. Beck said we are open to working with counties on the grants, but there is money in the budget supporting grant applications.

Director Wooster asked what the $60,000 budgeted for Prop 218 could be reallocated to. Mr. Beck said this money could possibly be used to handle costs relating to extraction.

Director Wooster asked what is composed of the additional outreach performed by Hallmark Group. Mr. Beck said Hallmark Group is involved in administering outreach which captures all of the individual questions received from stakeholders.

Director Wooster recommended allocating zero funds to W&C's economic analysis of projects and actions and Mr. Melton agreed.

Chair Yurosek commented that at the Cuyama Basin Water District (CBWD) meeting, EKI was asked to review the CBGSA budget from a technical standpoint, especially in regard to the level

of monitoring (levels, quality, and DWR TSS support). Mr. Melton said this is a potential opportunity to reduce costs.

SAC Chair Jaffe said she would like to look at an overview plan of the SAC's role moving forward. Director Wooster commented that she feels that the SAC's input is beneficial to the Board and suggested having the Board meeting first in the future. SAC Chair Jaffe asked if staff can examine Director Wooster's recommendation. Mr. Beck said staff's current budget is authorized through the end of January 2020, however if the Board would like to change the budget before January, then the Board can advise staff to change their task order.

Mr. Beck stated that there will not be a lot of information to review post-GSP submittal because the basin will be in the data collection phase.

Director Wooster mentioned that EKI had noticed clusters of wells at the same depth and asked if this was necessary. Mr. Beck said staff can amend the GSP to include less wells with the Board's approval. Director Wooster asked if the number of wells would be reduced when moving forward and Mr. Beck confirmed.

Director Wooster commented that if the Board chose to pass the budget, it does not mean that this money will need to be spent. She requested that there be cost reductions in the areas of Prop 218, SAC meetings, and monitoring expenses if possible.

MOTION
Director Chounet made a motion to adopt the Fiscal Year 2019-20 budget and directs staff to reduce Prop 218, SAC meetings, and monitoring expenses is possible. The motion was seconded by Director Bantilan, and the motion passed with a 93.33% vote.

AYES:	Directors Anselm, Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Williams, Wooster, and Yurosek
NOES:	Director Albano
ABSTAIN:	None
ABSENT:	None

d. Discussion on Updated GSP Draft and Response to Comments
Mr. Melton presented an update on the GSP draft and response to comments.

Chair Yurosek asked how the Board will reduce the economic impacts and costs. Mr. Melton said staff will structure it how the Board directs. Mr. Beck said the pumping allocation reductions are limited to the management area.

Chair Yurosek said he believes the CBWD should be responsible for the management areas.

Director Wooster said if the CBWD develops a plan on managing a management area, the Board would need to approve it.

Mr. Hughes said the Board can choose to hand the heavy lifting to the CBWD and come back to the GSA on how that should be managed.

Mr. Beck said currently the GSP states that the GSA will manage the management areas however staff can change this language to state that the GSA may delegate appropriately to a third party, which can be voted on by the Board. Chair Yurosek said he is not comfortable voting on the GSP currently and would like to develop an agreement during the 90-day public comment period that is acceptable by all Board members.

Mr. Hughes said after collecting all the comments prior to and at the public hearing and making the revisions to the GSP, the SGMA does not say that another public hearing is needed. He stated that he is unsure if the Board should push forward with the October hearing date.

Director Wooster commented that the Board should use the expertise of the CBWD and that she would like to see Chair Yurosek's language in the GSP.

Director Compton requested to modify the language in the GSP to prohibit artificial transfer or sale of groundwater out of the water shed, as recommended in San Luis Obispo's Cathy Martin's comment. She said Cathy had made this comment numerous times however it has not been addressed.

SAC Chair Jaffe asked if these changes can be addressed in the upcoming 90-day public comment period. Mr. Hughes said the delegation to the CBWD could be a determining factor in approving the GSP.

Mr. Hughes recommended sliding the timeline so staff can have the opportunity to adjust these components.

Stakeholder Sue Blackshear said she supports the plan with the CBWD serving at an advisory capacity.

Chair Yurosek directed staff to manage the calendar and to develop an agreement on how the CBWD should interact with the GSA during the implementation process.

e. Discussion Regarding Process for Future Adjustment of Pumping Restrictions under GSP
Mr. Hughes reminded the group that at a previous Board meeting there was a question regarding a way to draft around the pumping restrictions that the model dictates after the Board adopts the GSP. Mr. Hughes presented three potential options for the Board to consider.

Mr. Hughes suggested postponing this item until the August 7, 2019 CBSGA Board meeting.

Director Compton left at 8:31 pm

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f. Notice of Intent to Adopt the GSP
This item was postponed to the August 7, 2019 CBGSA Board meeting.

g. Set Public Hearing Date
This item was postponed to the August 7, 2019 CBGSA Board meeting.

h. Set SAC and Board Meetings through January 2020
This item was postponed to the August 7, 2019 CBGSA Board meeting.

i. Stakeholder Engagement Update
This item was postponed to the August 7, 2019 CBGSA Board meeting.

i. 90-Day Public Comment Process
This item was postponed to the August 7, 2019 CBGSA Board meeting.

7. Groundwater Sustainability Agency

a. Report on the Standing Advisory Committee Vacancy
Director Chounet reported that the ad hoc reviewed Jose Valenzuela's application for the SAC vacancy and two of the three members of the ad hoc were in favor of the approving the application.

MOTION
Director Chounet made a motion to appointment Mr. Valenzuela as a committee member on the SAC. Director Bantilan seconded. and the motion passed with a 64.45% vote.

AYES:	Directors Albano, Anselm, Bantilan, Bracken, Chounet, Christensen, Wooster,
NOES:	Directors Cappello and Yurosek
ABSTAIN:	None
ABSENT:	Directors Williams and Compton

b. Report of the Executive Director
This item was postponed to the August 7, 2019 CBGSA Board meeting.

c. Progress & Next Steps
This item was postponed to the August 7, 2019 CBGSA Board meeting.

d. Report of the General Counsel
This item was postponed to the August 7, 2019 CBGSA Board meeting.

8. Financial Report

a. Financial Management Overview
Mr. Beck provided an overview of the CBGSA's financial activities.

b. Financial Report
Mr. Beck provided an overview of the May 2019 financial report and is included in the Board packet.

c. Payment of Bills
Mr. Beck reported on the payment of bills for the month of May 2019.

MOTION
A motion was made by Director Wooster and seconded by Director Bantilan to approve payment of the bills through the month of May 2019 in the amount of $27,083.58, pending receipt of funds. A roll call vote was made, and the motion passed unanimously.

AYES:	Directors Albano, Anselm, Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Williams, Wooster, and Yurosek
NOES:	None
ABSTAIN:	None
ABSENT:	None

9. **Reports of the Ad Hoc Committees**
   Nothing to report.

10. **Directors' Forum**
    Director Albano suggested adding an item to the August 7, 2019 CBGSA Board agenda relating to water districts managing management areas within the Cuyama Basin.

11. **Public comment for items not on the Agenda**
    Nothing to report.

12. **Correspondence**
    Nothing to report.

13. **Adjourn**
    Chair Yurosek adjourned the meeting at 8:44 p.m.

Minutes approved by the Board of Directors of the Cuyama Basin Groundwater Sustainability Agency the 7th day of August 2019.

BOARD OF DIRECTORS OF THE
CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

Chair: _____

ATTEST:

Secretary: _____

Cuyama Basin Groundwater Sustainability Agency
Board of Directors

August 7, 2019

Draft Meeting Minutes

Cuyama Valley Family Resource Center, 4689 CA-166, New Cuyama, CA 93254

PRESENT:
Yurosek, Derek – Chair
Compton, Lynn – Vice Chair
Albano, Byron
Bantilan, Cory
Bracken, Tom
Cappello, George
Chounet, Paul
Christensen, Alan – *Alternate for Zack Scrivner*
Shephard, Glenn
Williams, Das *(telephonic)*
Wooster, Jane
Beck, Jim – Executive Director
Hughes, Joe – Legal Counsel

ABSENT:
None

1. **Call to Order**
   Chair Derek Yurosek called the meeting to order at 4:03 pm.

2. **Roll call**
   Hallmark Group Project Coordinator Taylor Blakslee called roll (shown above) and informed Chair Yurosek that there was a quorum of the Board.

3. **Pledge of Allegiance**
   The pledge of allegiance was led by Chair Yurosek.

4. **Approval of Minutes**
   Chair Yurosek opened the floor for comments on the July 10, 2019 CBGSA Board meeting minutes.

   Several Directors presented numerous corrections to the minutes and requested that they be tabled and revised at the next meeting. Executive Director Jim Beck let the Board know Hallmark Group would revise the minutes without charging the CBGSA.

5. **Groundwater Sustainability Plan**
   Mr. Melton provided an update on the GSP development, which is included in the Board packet.

a. Groundwater Sustainability Plan Update

Woodard & Curran's (W&C) Project Manager Brian Van Lienden provided an update on the Groundwater Sustainability Plan (GSP). He stated that the second invoice was submitted to the California Department of Water Resources (DWR), and they have started work on the economic analysis and will have an update in October 2019.

i. Public Comment Process

Mr. Van Lienden noted that if the Board adopts the Intent to Adopt a GSP, a public comment period will start and conclude with a public hearing in November 2019. He reported on several ways the public can comment on the GSP and the efforts underway to inform Cuyama stakeholders aware of the comment period via e-mail and postal mail.

b. Discussion on Extraction Fee Calculation and Collection

CBGSA Executive Director Jim Beck reported that a groundwater extraction fee was discussed at the July 10, 2019 CBGSA Board meeting where the Board took action that a fee would be based on groundwater extractions for 2020 and requested staff to come back to the Board in August 2019 with direction on the administration of a groundwater extraction fee.

Legal Counsel Joe Hughes provided an overview of the legal authority and process for establishing a groundwater extraction fee and discussed Water Code 10730 which provides the authority for establishing an extraction fee. He noted that one question to determine was can you assess fees for administration in arears or in advance. Mr. Beck said he and legal counsel Joe Hughes are recommending the CBGSA charge fees by some historic basis and then true up fees based on actual data in six months.

Director Compton presented an economic study from the Hansford Group in the Salinas Valley which looked at the basis for passing a Prop 218. She asked if a fee study must be done. Mr. Hughes said yes, a fee study must be done prior to a fee being established. He said some groups determine their fees based on their budget. Mr. Hughes said you can look at the cost of running the CBGSA over a 5-year period and do a study to determine the fee required for the administration of the CBGSA.

Mr. Beck noted that the Board provided direction in July 10, 2019 to establish a 1-year fee based on groundwater extractions and presented several questions for the Board to consider, such as who constitutes a de minimis user. Mr. Hughes confirmed that the Board has some discretion to define de minimis users.

Mr. Beck recommended assigning an ad hoc to work on the development of a groundwater extraction fee.

Mr. Beck presented forms that are used by one of Bakersfield's improvement districts to determine water use for landowners that are not metered. In addition to the forms, Mr. Beck said you could also use satellite imagery.

Director Glenn Shephard said metering and volunteer reporting in Ventura County has been used successfully for many years.

Chair Yurosek recommended an ad hoc consisting of different type of parties that will be impacted. Chair Yurosek appointed Directors Paul Chounet, Jane Wooster, Lynn Compton, George Cappello, and Glenn Shephard. Director Compton said she cannot meet regularly and declined to participate. Director Cory Bantilan asked to be added in her place and Chair Yurosek confirmed this change.

Regarding the schedule, Mr. Beck said the CBGSA will have $90,000 cash on hand at the end of January 2020, and in order to fund the CBGSA, funds will need to be collected via a groundwater extraction fee starting November 2019 since we anticipate two months to invoice, notice and collect funds.

Mr. Beck said it is important to meet quickly to discuss the policy and administration of a groundwater extraction ad hoc.

c. Discussion Regarding Process for Future Adjustment of Pumping Restrictions under GSP

Mr. Hughes said there was a question that developed some time ago asking if you put pumping restrictions in your GSP, would there be a way to revisit this in the future if the data collected in the interim informed changes to pumping amounts.

Mr. Hughes said you can sunset the restriction, but if you submit this to DWR in your plan, they may look favorably at this type of mechanism in the plan.

Director Wooster commented that as soon as we have enough actual data, we should be making decisions based on that, not just an updated model. Mr. Beck said that is a correct way to think about it and you would want to look at all the data sources to make a decision.

d. Principles of Agreement between the Cuyama Basin Groundwater Sustainability Agency (CBGSA) and the Cuyama Basin Water District for the Administration and Management of the Central Region Management Area of the CBGSA

Mr. Hughes reported on the principles of agreement for administration implementation of the GSP in the Central Region management area. He reported that for the sake of time he drafted a set of principles and sent them to Cuyama Basin Water District's (CBWD) legal counsel Alan Doud and he provided a red-line-strikeout version.

Chair Yurosek suggested an ad hoc to work with staff and the CBGSA to develop an agreement with the CBWD to meet roughly once per month via conference line.

He appointed Directors Williams, Compton, Albano, and Yurosek and staff from both the CBWD and CBGSA. Director Albano let Chair Yurosek he cannot participate in this ad hoc since he is going into a busy season on his farm. Chair Yurosek appointed Director Bracken in place of Director Albano.

Director Wooster said the language in the GSP should say CBWD "may" administer the management areas, not "will."

Cuyama Valley Family Resource Center's Executive Director Lynn Carlisle asked if the CBGSA Board will issue the Notice of Intent to Adopt and then figure out the agreement going forward. Mr. Hughes confirmed this. She asked if the fee details will be in the GSP. Mr. Hughes said no, it

will be in an agreement.

Director Albano said he does not agree with the administration of the management areas being bigger than just the management areas. Director Cappello said it makes sense to make it the CBWD so we do not have to revisit this again. Mr. Hughes said making it the CBWD gives you maximum flexibility and Director Cappello said folks can opt-in or opt-out.

Mr. Beck said the intent is to finalize the agreement before the public hearing, but you could adopt this after if it is not finalized.

Director Wooster asked if the agreement with the CBWD could be different from time to time and presented the thought that the agreement may need to change based on what you are managing. Mr. Hughes said that makes sense.

Director Chounet said when it said it "will" be made part of the GSP and would require a super majority vote where saying "may" does not necessarily require this. Mr. Hughes said he understood this point but thinks it is safer to assume we will require a super majority vote.

Director Albano asked procedurally if we will vote on the plan and then add it to the GSP or add it to the GSP and vote on the GSP. Mr. Hughes said he anticipates voting on the agreement at the public hearing.

Chair Yurosek recommended the agreement not be in the GSP and be brought back to the Board for consideration once developed—hopefully by the public hearing in November 2019.

Ms. Carlisle commented that she believes the development of an agreement for the administration of the management actions and projects in the CBWD should include public input at various stages of its development. Mr. Hughes commented that the public will have an opportunity to see the agreement when it is brought before the Board. Ms. Carlisle asked if it will be in the plan that is submitted to DWR for the public provide comments on. Mr. Beck said it is not a requirement of SGMA to review local agreements.

e. Notice of Intent to Adopt the GSP

Mr. Hughes presented the letter that would go out to the counties and cities which serves as the Intent to Adopt a GSP under the Sustainable Groundwater Management Act (SGMA).

Director Albano commented that one of the letters should be addressed to Cuyama Valley High School, not New Cuyama High School.

MOTION

Director Compton made a motion to adopt the notice intent to adopt the GSP. The motion was seconded by Director Cappello, and the motion passed with a unanimous vote.

AYES:	Directors Albano, Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Shephard, Williams, Wooster, and Yurosek
NOES:	None
ABSTAIN:	None
ABSENT:	None

The Board also considered language changes to GSP Section 7.4.3 Water Supply Transfers/Exchanges. Director Wooster asked to add language in the GSP to this section that would explicitly outline that potential transfer water associated with the storm water capture project would originate outside the Cuyama Basin.

MOTION
Director Alan Christensen made a motion to approve the wording changes to GSP section 7.4.3. The motion was seconded by Director Shephard, and the motion passed with a 93.33% vote.

AYES:	Directors Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Shephard, Williams, Wooster, and Yurosek
NOES:	Director Albano
ABSTAIN:	None
ABSENT:	None

f. Set Public Hearing Date
Director Albano asked once we go to the 90-day public comment period do we need an additional comment period if we make changes to the GSP based on public comment received. Mr. Hughes said no, the Board can make changes based on feedback received at the public hearing.

Director Albano said major changes would be needed to make him comfortable with this plan. He commented that W&C originally quoted $600,000 to $1,000,000, and we have now spent over $2,000,000 and believes this is way too much money. He said as we received more money from the grant, the Board authorized more work and activities and then we ended up doing a lot more and ran out of money and is very disappointed in the GSP.

MOTION
Director Bracken made a motion to set the public hearing date for the conclusion of the public comment period to November 6, 2019. The motion was seconded by Director Chounet, and the motion passed with a 93.33% vote.

AYES:	Directors Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Shephard, Williams, Wooster, and Yurosek
NOES:	Director Albano
ABSTAIN:	None
ABSENT:	None

g. Revise the CBGSA Meeting Schedule through January 2020
Mr. Beck presented the revised CBGSA schedule through GSP submittal in January 2020. He commented that the public hearing is on November 6, 2019 and the Standing Advisory Committee (SAC) meeting is tentatively scheduled for October 24, 2019, which would only be necessary if we need feedback on the Category 1 grant well and stream gage locations. He suggested we could potentially meet with the SAC before the November 6, 2019 meeting if

appropriate, or we could do this work via email or teleconference.

Director Cappello questioned whether we need a separate meeting and believes we could cover these items in a joint Board and SAC meeting. Director Chounet asked if the SAC would be reviewing the delegation agreement and Mr. Beck said that is a possibility and it may make sense to move it before the Board on November 6, 2019. The Board confirmed that they were still ok with meeting at 4:00 p.m. on November 6, 2019 prior to the public hearing at 6:00 p.m.

SAC member Joe Haslett commented that unless they are doing something worthwhile and needed, do not schedule it. If there is something to schedule, he would be happy to participate. Chair Yurosek said the CBWD agreement and location of wells and gages may be important for the SAC to weigh-in on.

MOTION
Director Cappello made a motion to set the remaining Groundwater Sustainability Agency Board of Directors and Standing Advisory Committee meetings through January 2020 according to the schedule provided in Agenda Item No. 6g. The motion was seconded by Director Compton, and the motion passed with a unanimous vote.

AYES:	Directors Albano, Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Shephard, Williams, Wooster, and Yurosek
NOES:	None
ABSTAIN:	None
ABSENT:	None

6. Groundwater Sustainability Agency

a. Report of the Executive Director
No additional update.

b. Progress & Next Steps
Mr. Beck provided an update on the near-term GSP schedule and accomplishments and next steps, which are summarized in the Board packet.

c. Report of the General Counsel
No additional update.

7. Financial Report

a. Financial Management Overview
Mr. Beck provided an overview of the CBGSA's financial activities.

b. Hallmark Group Task Order
Mr. Blakslee provided an overview of Hallmark Group task order No. 4 which covers the budgeted items not currently accounted for in task order No. 3. The only task in task order No. 4 is for development of a groundwater extraction fee.

MOTION

Director Cappello made a motion to adopt Hallmark Group's Task Order No. 4. The motion was seconded by Director Compton, and the motion passed with a 93.33% vote.

AYES:	Directors Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Shephard, Williams, Wooster, and Yurosek
NOES:	None
ABSTAIN:	Director Albano
ABSENT:	None

c. Woodard & Curran Task Order

Mr. Van Lienden provided an update on the task order for items not covered under their current task order for work in the July 2019 through January 2020 period.

Director Albano said the Board keeps agreeing to things that we cannot afford and cannot understand how we had a proposal for $600,000 to $1,000,000 and now we are at $2,000,000 plus and are being asked for more money. Director Albano said these costs are the tip of the iceberg. He said some of the management actions are contemplated for tens of millions of dollars and we will need to move in another direction. He said the CBGSA Board needs to start living within our means.

Director Williams said there were a lot of things that did not happen perfectly that attributed to cost overruns. He said five Directors on the Board have funded a consultant war which elevated the cost to the CBGSA. He recommended not fueling two sides of a war. Director Albano suggested Director Williams attend a CBWD meeting. He said they run them differently and they are pretty cheap. Director Williams said he is talking more about the detail and work that comes out of the tech forum. Director Cappello said he disagrees, and their sensitivity analysis can change pumping reductions in the Central Basin by 50%.

Chair Yurosek said we have battled through each budgetary issue the CBGSA has faced and he has been very vocally against overspending and set budget ad hocs to assist in providing financial oversight and does not think the Board has been rubber stamping things.

Director Wooster said things have been expensive, but the plan is based on actual data where the last report a model was based on was an older U.S. Geological Survey (USGS) study and does not know if we can quantify the tremendous value in having a model with real data.

MOTION

Director Cappello made a motion to adopt Woodard & Curran's Task Order No. 6. The motion was seconded by Director Compton, and the motion passed with a 93.33% vote.

AYES:	Directors Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Shephard, Williams, Wooster, and Yurosek
NOES:	None
ABSTAIN:	Director Albano
ABSENT:	None

d. Financial Report

Mr. Beck provided an overview of the June 2019 financial report, which is included in the Board

packet.

e. Payment of Bills

Mr. Beck reported on the payment of bills for the month of June 2019. Committee member Haslett suggested to consider Prop 68 funds impact on a groundwater extraction fee.

MOTION

A motion was made by Director Christensen and seconded by Director Bantilan to approve payment of the bills through the month of June 2019 in the amount of $20,167.78, pending receipt of funds. A roll call vote was made, and the motion passed with a 88.89% vote.

AYES:	Directors Albano, Anselm, Bantilan, Bracken, Cappello, Chounet, Christensen, Compton, Wooster, and Yurosek
NOES:	None
ABSTAIN:	None
ABSENT:	Director Williams

8. Reports of the Ad Hoc Committees

Nothing to report.

9. Directors' Forum

Nothing to report.

10. Public comment for items not on the Agenda

Nothing to report.

11. Correspondence

Mr. Beck read the below comment from SAC Chair Robbie Jaffe and Vice Chair Brenton Kelly.

Robbie, Brenton and Jim Beck had a conversation on 7/30/19 where we discussed the upcoming needs of the GSA during the implementation of the GSP, and how an Advisory Committee could be most useful. Several issues were discussed that focused on the following topics:

1. Priority activities of the GSA in the first 2-3 years: Allocations/Restrictions - Monitoring Network Development - Management of Monitoring Network
2. Budget: Possible ways to reduce the SAC budget
3. Management Area Authority: Oversight, Compliance and Transparency

1. Priority activities: We discussed that the first part of the implementation phase will include development of some major policy components in order to implement the GSP. The GSA would be well served with a SAC that has continuity from the development phase and can make considered recommendations to the GSA regarding the development of the Monitoring Network to fill data gaps and review of data collection as it comes in as well as reviewing the establishment of an allocation methodology. We encourage the GSA Board to anticipate how they could best utilize the SAC and Technical Forum sub-committees as the nuts and bolts of implementation are worked out in the next

few years. These committees could also help with oversight, compliance, and stakeholder outreach during this critical implementation phase of the GSP. A thoughtful approach to restructuring the SAC and/or combining with the Technical Forum would add value to the budget allocations.

2. Budget Reductions for SAC meetings: We agreed that now that a relationship has been established with the Woodard & Curran consultants, it would be possible to have them participate in the meeting through tele-conference and save travel time & per diem costs. It was further considered that after this initial implementation phase it could be anticipated that the number of meetings per year could be reduced from 6 to 4. This would coincide with monitoring frequencies, when reports are due to DWR and the scope of ongoing needed actions. In addition, we discussed that since all of the SAC meeting agenda items are part of the GSA Board packet that there is negligible additional cost for development of the SAC agenda packet.

3. Management Area Authority: At the April 2019 GSA Board meeting, the Board voted to retain control of the management areas and not delegate this to another agency. The main concern expressed at this meeting was a lack of details in what would be delegated and what authority would be retained by the GSA. We think the GSA should maintain this authority since the Board represents a cross-section of members from the Water District, County representatives and the CCSD and can best represent all stakeholders. If it is the intent of the GSA to delegate some authority to the CBWD then we request this agreement pay attention to the details and maintain oversight and approvals at every step by the entire GSA Board. If authority were to be delegated to the CBWD it must clarify levels of cooperation, require verification and transparency and demonstrate a commitment to the mandates of SGMA. Any such delegation should be matched with sufficient oversight and enforcement capacity to ensure the other GSA members and stakeholders that the Cuyama Basin GSP is being implemented successfully.

Thank you for considering these comments. While the SAC represents diverse opinions, all committee members take our responsibilities seriously and we look forward to serving the GSA Board and the community in this capacity as we move toward sustainability.

12. Adjourn

Chair Yurosek adjourned the meeting at 6:37 p.m.

Minutes approved by the Board of Directors of the Cuyama Basin Groundwater Sustainability Agency the 6 day of November 2019.

BOARD OF DIRECTORS OF THE
CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

Chair: _____

ATTEST:

Secretary: _____

TO: Board of Directors
Agenda Item No. 6

FROM: Brian Van Lienden, Woodard & Curran

DATE: November 6, 2019

SUBJECT: Groundwater Sustainability Plan

Issue
Update on the Cuyama Basin Groundwater Sustainability Agency Groundwater Sustainability Plan.

Recommended Motion
None – information only.

Discussion
Cuyama Basin Groundwater Sustainability Agency Groundwater Sustainability Plan (GSP) consultant Woodard & Curran's GSP update is provided as Attachment 1.

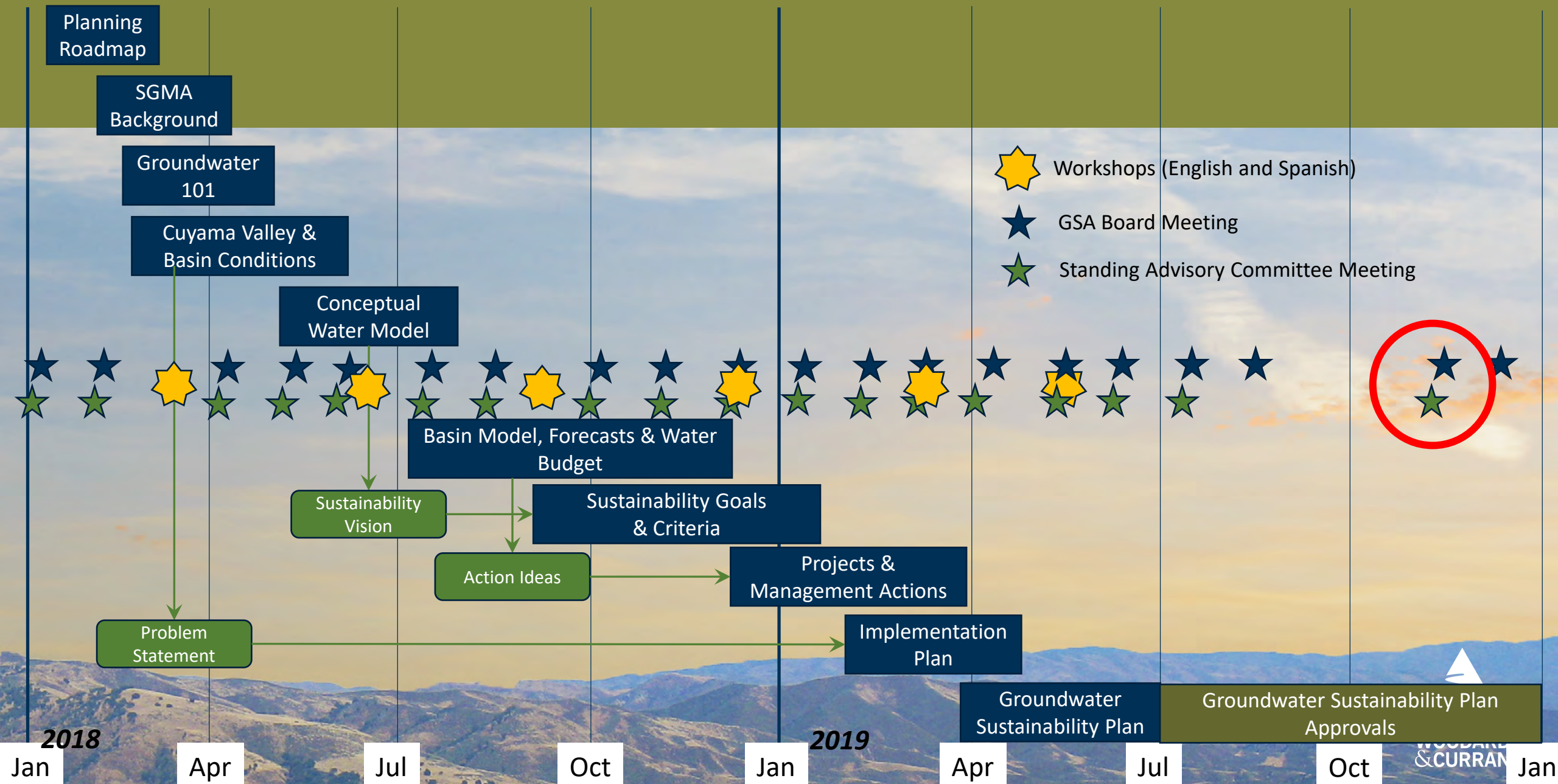
Cuyama Basin Groundwater Sustainability Agency

Groundwater Sustainability Plan Update

November 6, 2019

WOODARD &CURRAN

Cuyama Basin Groundwater Sustainability Plan – Planning Roadmap



August - October GSP Accomplishments

- ✓ Updated GSP Final Draft in response to Board comments at August Board meeting
- ✓ Identified potential locations for groundwater data sensors and surface flow gages
- ✓ Worked with the DWR Technical Support Services Ad-hoc to identify locations for proposed new wells
- ✓ Developed model for economic analysis of GSP proposed actions

WOODARD &CURRAN

TO: Board of Directors
Agenda Item No. 6a

FROM: Joe Hughes, Legal Counsel

DATE: November 6, 2019

SUBJECT: Agreement between the Cuyama Basin Groundwater Sustainability Agency (CBGSA) and the Cuyama Basin Water District for Administration and Management of the Central Region Management Area of the CBGSA

Issue

Agreement between the CBGSA and the Cuyama Basin Water District for Administration and Management of the Central Region Management Area of the CBGSA as outlined in the November 6, 2019 memo to the CBGSA Board, item No. 6a.

Recommended Motion

Adopt the Agreement between the Cuyama Basin Groundwater Sustainability Agency (CBGSA) and the Cuyama Basin Water District for Administration and Management of the Central Region Management Area of the CBGSA.

Discussion

At the July 10, 2019 Cuyama Basin Groundwater Sustainability Agency (CBGSA) Board meeting, the Board directed staff to develop principles delegating the responsibility for implementation of the Groundwater Sustainability Plan (GSP) within some or all of the Cuyama Basin Water Districts' (CBWD) boundaries following adoption of the GSP to the CBWD. CBGSA chairman Derek Yurosek appointed an ad hoc consisting of Directors Bracken, Compton, Williams and Yurosek to work with staff on developing these principles.

Legal Counsel Joe Hughes drafted a term sheet outlining key points of the delegation that was approved by the ad hoc and the CBWD. The term sheet was used to develop the draft agreement that is provided as Attachment 1 for consideration of approval and has been approved by the ad hoc and by the CBWD, pending review of county counsel comments. The attached agreement is provided in a redline strikeout version that shows the County of San Luis Obispo's comments that were received after the last ad hoc meeting on October 25, 2019.

DRAFT
OCTOBER 31, 2019

DELEGATION AND MANAGEMENT AGREEMENT

THIS DELEGATION AND MANAGEMENT AGREEMENT (**Agreement**) is entered into this ___ day of _____, 2019 (**Effective Date**), by and between CUYAMA BASIN WATER DISTRICT (**District**) and CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY (**Agency**). District and Agency may be referred to individually as a **Party** or collectively as **Parties**.

RECITALS

A. Agency is a joint exercise of powers authority duly formed and existing under the Joint Exercise of Powers Act (Gov. Code § 6500 *et seq.*) and that certain *Joint Exercise of Powers Agreement-Cuyama Basin Groundwater Sustainability Agency* dated June 6, 2017 (**JPA**).

B. Agency was formed by its members to act as the Groundwater Sustainability Agency (**GSA**) for the Cuyama Groundwater Basin (**Basin**) and carry out the purposes of the Sustainable Groundwater Management Act (**SGMA**), including the development, adoption and implementation of a groundwater sustainability plan (**GSP**) for the Basin.

C. District is duly formed and existing under the California Water District Law and is a member of the Agency.

D. SGMA vests the Agency with certain powers and authorities to manage groundwater resources within the Basin through its adopted GSP and measures specified in SGMA, including those enumerated in Chapter 5, commencing with Water Code section 10725.

E. Consistent with the authority of the Agency expressly provided for under SGMA to "provide the maximum degree of local control and flexibility consistent with the sustainability goals" of SGMA, Agency and District wish to set forth the terms and conditions under which District will be responsible for implementation and enforcement of the Agency's GSP within District's portion of the Basin.

NOW, THEREFORE, the Parties hereby agree as follows:

AGREEMENT

ARTICLE I

DELEGATION OF IMPLEMENTATION

1.00. The GSP will identify particular methods of groundwater resource management and enforcement measures in the Basin (each, a **Measure**). Subject to the terms and conditions set forth in this Agreement, Agency may authorize and delegate to District the responsibility for implementing and enforcing within District's boundaries any Measure or any action under a Measure. District may, in its sole and absolute discretion, elect to accept any such authorization

Deleted: ,

and delegation. District must provide Agency with reasonable notice under the circumstances of that election as to any Measure or action for which District elects to assume responsibility. District may request Agency to make a delegation under this section 1.00. Upon such a request, the Parties will meet and confer regarding the subject Measure or action, but Agency will not be obligated to make the delegation.

1.01 In carrying out activities under this Agreement:

(a) District shall comply with and implement the GSP, as the GSP may from time-to-time be amended.

(b) Where Agency has specified in the GSP the manner in which a Measure is to be implemented or enforced, District shall comply with those specifications.

(c) Where Agency has not specified in the GSP the manner in which a Measure is to be implemented or enforced, District may exercise its reasonable discretion following notification to Agency of District's intent to exercise that discretion. The notice to Agency must be reasonably sufficient under the circumstances to allow Agency to review and respond to District's proposed implementation. District may not then begin implementation regarding the subject Measure until Agency and District have agreed in writing to a budget and schedule for District's discretionary implementation.

1.02. Recognizing that the GSP may be amended from time to time and the possibility that not all Measures or actions will be economically or logistically feasible for District to implement or enforce on its own, the Parties acknowledge that District may, but is not obligated to, undertake the activities provided for in this Agreement. Agency and District shall evaluate all Measures from time to time, but not more than three (3) times per year, to determine whether any particular Measure, or action under a Measure, is or is not appropriate for implementation or enforcement by District.

1.03. District is entitled to identify and undertake any voluntary actions to manage groundwater resources within its boundaries as are within the District's powers as provided in the California Water District Law. District shall consult with Agency from time-to-time to determine if such voluntary actions should be included in the GSP.

Deleted: the Basin

ARTICLE II

DISTRICT REPORTS TO AGENCY

2.00. District shall report to Agency as required under the GSP, and as otherwise necessary or appropriate to keep Agency apprised of District's groundwater management activities within the Basin and allow Agency to comply with Agency's reporting duties under SGMA.

2.01. In addition to the reporting duties under section 2.00 above, District shall report to Agency at each meeting of Agency's Board of Directors regarding the status of any Measures delegated to District under this Agreement.

ARTICLE III

FINANCIAL

3.00. Agency shall reimburse District from groundwater extraction fees paid by District landowners to Agency all costs incurred by District attributable to implementation of Measures delegated to District under this Agreement, including District's direct retention of separate personnel and consultants. As a condition precedent to District's entitlement to reimbursement under this section 3.00, however, District must reasonably demonstrate to Agency in advance of District incurring a subject cost an economic benefit to or savings for Agency attributable to District performing the Measure instead of Agency.

3.01. District shall:

(a) Reimburse Agency for all of Agency's out-of-pocket costs actually incurred attributable to separate management of the portion of the Basin within District's boundaries. As a condition precedent to District's entitlement to reimbursement under this section 3.01(a), however, District must notify Agency before incurring the subject cost either by obtaining Agency's prior approval or including the cost in Agency's approved budget.

(b) Be responsible for all costs associated with District's *voluntary* groundwater management actions undertaken pursuant to section 1.03 above. However, if Agency incorporates a voluntary District action into the GSP as a Measure and District exercises its right under this Agreement to undertake that Measure, then District will be entitled to reimbursement under section 3.00 above.

3.02. Nothing in this Agreement may be interpreted to limit, restrict, alter, or in any other way modify:

(a) Agency's authority to impose and collect fees, charges, assessments, or any other amounts under the GSP or SGMA from landowners or extractors within the District boundaries; or

(b) The obligation of District landowners or extractors to pay without offset Agency fees, charges, assessments, or any other amounts under the GSP or SGMA allocable to Measures not delegated to District under this Agreement.

3.03. Nothing in this Agreement, including any reimbursement obligation under this Article III, may increase the costs to Agency of implementing or enforcing the GSP or any Measure.

3.04. If grant funding becomes available for which the District and Agency are both eligible, neither Party may apply for such funding without consulting with the other Party. If both Parties wish to pursue the same grant funding, the Parties through their staffs shall cooperate with each other and in good faith pursue the subject funding in a manner that will maximize the benefit to the Basin, subject to final approval by their governing boards.

ARTICLE IV

RESERVATION OF POWERS

4.00. Neither Party intends by this Agreement to infringe upon the powers of the other.

4.01. Neither Party intends by this Agreement to relinquish any statutorily-granted authority to the other, and both Parties acknowledge and agree as follows:

(a) Agency reserves to itself all rights, powers and authorities available to it under SGMA, the JPA, and the Joint Exercise of Powers Act to do all such acts as it deems necessary or appropriate to further its purposes. Unless performed by District with District sharing any results with Agency, this includes collection and maintenance of groundwater extraction information and other technical data, and performance of groundwater studies and other technical groundwater investigations. Nothing in this Agreement is intended to permanently relinquish or may be interpreted as permanently relinquishing any of Agency's rights, powers and authorities to adopt, administer, implement and enforce SGMA and the GSP in the portion of the Basin situated within the District's boundaries.

(b) District reserves to itself all rights, powers and authorities available to it under California Water District Law to do all such acts as it deems necessary or appropriate to further its purposes. Nothing in this Agreement is intended or may be interpreted as relinquishing any of District's rights, powers and authorities to engage in water management and water distribution activities within the District's boundaries, subject to the requirements of the GSP.

ARTICLE V

TERM AND TERMINATION

5.00. This Agreement will become effective on the Effective Date and will terminate on July 1, 2022.

5.01. District may, in District's sole and absolute discretion, terminate delegation of any Measure or action under a Measure provided that District first:

(a) Provides reasonably sufficient notice to Agency to allow Agency to consider and take appropriate action regarding any impact on Agency's then current fiscal year budget; and

(b) Pays or reimburses Agency for any one-time incremental costs attributable to termination of delegation and transition of responsibility for the subject Measure to Agency.

(c) Provides to Agency any data, information or material developed or gathered by District in performing the delegation.

ARTICLE VI

INDEMNIFICATION

6.00. **By District.** District shall defend, indemnify and hold harmless Agency, including its directors, officers, managers, employees and agents, from and against all liabilities, obligations, claims, damages, causes of action, costs and expenses (including reasonable attorney's fees and expenses) (**Losses**) arising from (a) District exercising its rights under this Agreement, and (b) any acts or omissions of District, including its directors, officers, managers, employees and agents, implementing and enforcing Measures within the Basin, except as provided under section 6.01 below.

6.01. **By Agency.** Agency shall defend, indemnify and hold harmless District, including its directors, officers, managers, employees and agents, from and against all Losses arising from District's enforcement or implementation of a Measure under section 1.01(b) above.

6.02. **Limitations**. In no event will any right of indemnification provided for in this Article VI extend to (a) any Losses to the extent resulting from the negligence, breach of contract, or willful misconduct of an indemnified Party, or (b) consequential or punitive damages, except in the case of claims by third parties.

ARTICLE VII

MISCELLANEOUS

7.00. **Entire Agreement; Amendments or Modifications.** This Agreement contains the entire Agreement and understanding concerning the subject matter between the Parties and supersedes and replaces all prior negotiations of proposed agreements, written or oral, if any. This Agreement shall not be amended or modified except in writing, executed and agreed to by all of the Parties to this Agreement.

7.01. Severability. If any paragraph, sentence, clause, or phrase becomes illegal, null, or void for any reason or is held by any court of competent jurisdiction to be illegal, null, void, or against public policy, the remaining paragraphs, sentences, clauses, or phrases are not affected, and the Parties must negotiate an equitable adjustment of the affected provision with a view toward effecting the purpose of this Agreement.

7.02. Construction. Headings are used for convenience only and have no force or effect in the construction or interpretation of this Agreement. As used in this Agreement, the singular includes the plural and the masculine includes the feminine and neuter. This Agreement is a joint product of both Parties and is to be interpreted as such. This Agreement: (a) shall not be construed against the Party preparing it; (b) shall be construed as if the Parties had jointly prepared this Agreement; and (c) shall be deemed their joint work product.

7.03. No Third-Party Rights. Nothing in this Agreement, whether expressed or implied, either is intended, or is to be construed, or otherwise interpreted as, conferring any rights or remedies on any third parties.

7.04. Governing Law and Venue. This Agreement is entered into and performed in the State of California and is to be interpreted pursuant to the internal substantive law, and not the law of conflicts, of the State of California. Venue in any action brought under this Agreement shall be in the Superior Court of the County of Santa Barbara, State of California.

7.05. Notices. All notices and other communications under this Agreement must be in writing and will be deemed to have been duly given if (a) delivered by hand to the presiding officer of a Party's Board of Directors and receipted for by the Party to whom that notice or other communication is directed, (b) mailed with postage prepaid and concurrently emailed, on the third business day after the date on which it is so mailed and emailed, or (c) mailed by reputable overnight courier and receipted for by the Party to whom that notice or other communication is directed. Mailed notices to each Party must be sent to the last address of record according to the California Secretary of State.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the Effective Date.

CUYAMA BASIN WATER DISTRICT	CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY
By: _____	By: _____
Name: _____	Name: _____

DRAFT
OCTOBER 31, 2019

Title: _____ Title: _____

TO: Board of Directors
Agenda Item No. 6b

FROM: Brian Van Lienden, Woodard & Curran

DATE: November 6, 2019

SUBJECT: Adopt Resolution Authorizing the CBGSA Board Chairperson as the Authorized Representative to File an Application and Execute an Agreement with the California Department of Water Resources for the Prop 68 Grant Program

Issue

Adopt a resolution authorizing the chairperson as the authorized representative for the Prop 68 grant program application.

Recommended Motion

Adopt Resolution No. 19-01 authorizing the CBGSA Board Chairperson, or his designee, as the authorized representative to file an application and execute an agreement with the California Department of Water Resources for the Prop 68 Grant Program.

Discussion

The California Department of Water Resources released additional funds under Proposition 68 for continued Groundwater Sustainability Plan (GSP) development and future rounds for GSP implementation. The current Round 3 program allows a maximum award amount of $500,000 for basins that already received Prop 1 grant money.

CBGSA Chair Yurosek appointed the following ad hoc to work with staff to develop the application for the Round 3 grant—Directors Bracken, Cappello, Shephard and Williams. A summary of the items to be included in the CBGSA's application is provided as Attachment 1. One of the requirements of the application is a signed resolution by the Board appointing an authorized representative to file an application and execute an agreement with the California Department of Water Resources for the Prop 68 Grant Program. Resolution 19-01, provided as Attachment 2, appoints the Board chairperson or his designee.

The initial deadline for Prop 68 applications was November 1, 2019, however due to impacts of recent fires in the State and power outages, DWR extended the deadline until November 15, 2019. Provided as Attachment 3 is a list of the support letters received to-date that will accompany the application.

Board Authorization of Resolution for DWR Grant Proposal

- A grant proposal is under development for funding under DWR's Sustainable Groundwater Management Round 3 Grant Program
- Cuyama Basin proposal includes the following components (as approved by the ad-hoc committee):
  - Supplemental GSP development funding
  - Development of a groundwater extraction fee structure
  - Economic analysis of the Cuyama Basin
  - Initial Work to establish a groundwater levels monitoring network

WOODARD &CURRAN

DRAFT

RESOLUTION OF THE CUYAMA BASIN
GROUNDWATER SUSTAINABILITY AGENCY

Resolution No: 19-01

RESOLUTION DESIGNATING THE BOARD CHAIRPERSON, OR DESIGNEE, AS THE AUTHORIZED REPRESENTATIVE TO FILE AN APPLICATION AND EXECUTE AN AGREEMENT WITH THE CALIFORNIA DEPARTMENT OF WATER RESOURCES FOR THE SUSTAINABLE GROUNDWATER PLANNING GRANT PROGRAM'S "GROUNDWATER SUSTAINABILITY PLANS AND PROJECTS" SOLICITATION

The following Resolution is hereby offered and read:

WHEREAS, in 2014, the California Legislature adopted, and the Governor signed into law, three bills (SB 1168, AB 1739, and SB 1319) collectively referred to as the Sustainable Groundwater Management Act (SGMA) (Water Code §§ 10720 *ct seq.)*, that became effective on January 1, 2015, and that leave been and may continue to be amended from time to time; and

WHEREAS, SGMA requires the formation of Groundwater Sustainability Agencies (GSAs) for the purpose of achieving groundwater sustainability through the adoption and implementation of Groundwater Sustainability Plans (GSPs) for all medium and high priority basins as designated by the California Department of Water Resources (DWR); and

WHEREAS, both SGMA (Chapter 6, Water Code §§ 10727 *ct seq.)* and the regulations adopted by DWR pursuant thereto (California Code of Regulations, Title 23 §§ 350 *ct seq.)* set forth detailed requirements related to the necessary elements of a GSP; and

WHEREAS, also in 2014, California voters approved Proposition 1 (AB 1471) which enacted the Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Water Code §§ 79700 *et seq.)* (Act) that authorizes the issuance of bonds to finance, among other things, a Sustainable Groundwater Planning Grant Program; and

WHEREAS, DWR opened the Sustainable Groundwater Planning Grant Program's expedited "Groundwater Sustainability Plans and Projects" solicitation, available to GSAs for high and medium priority basins to support activities associated with the planning, development, or preparation of GSPs in compliance with the applicable regulatory requirements; and

WHEREAS, DWR designated the Cuyama Valley Groundwater Basin as a high priority basin, subject to a condition of critical overdraft; and

WHEREAS, the Cuyama Basin Groundwater Sustainability Agency ("Agency") is a joint powers agency formed in June 2017, pursuant to Government Code §§ 6500 *et seq.* and Water Code §§ 10720 e/ *seq.*, by the Counties of Kem, San Luis Obispo, and Ventura, the Cuyama Basin Water District, the Cuyama Community Services District, and the Santa Barbara County Water Agency;

WHEREAS, the Board Chairperson, or designee, is especially suited to ensure that grant application materials and related GSP development efforts are prepared in a complete, efficient, and adequate manner; and

DRAFT

WHEREAS, the Board Chairperson, or designee, has the ability to ensure that grant-funded studies and efforts are carried out in full compliance with the applicable permits and the grant agreement.

NOW, THEREFORE BE IT RESOLVED BY THE AGENCY THAT:

1. The Cuyama Basin Groundwater Sustainability Agency will submit an application to the California Department of Water Resources to obtain a grant under the 2019 Sustainable Groundwater Management Grant Programs Planning Grant – Round 3 pursuant to the Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Proposition 1) (Wat. Code, § 79700 et seq.) and/or the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018 (Proposition 68) (Pub. Resources Code, § 80000 et seq.).

2. The Board Chairperson, or designee, of the Cuyama Basin GSA is hereby authorized and directed to prepare the necessary data, conduct investigations and file such application required for Grant funding, and execute the Grant Agreement and any amendments thereto (approved as to form by the legal counsel to the Cuyama Basin Groundwater Sustainability Agency) with the California Department of Water Resources.

Passed and adopted this _____ day of _____ by the following vote:

Yes:
No:
Abstain:
Absent:

CUYAMA BASIN GROUNDWATER
SUSTAINABILITY AGENCY

_____

Chairperson, Board of Directors

Prop 68 Application Support Letters

1	Arnold, Debbie	Supervisor, San Luis Obispo County
2	Bracken, Tom	CFO, Sunridge Nurseries
3	Carlisle, Lynn	Executive Director, Cuyama Valley Family Resource Center
4	Compton, Lynn	Supervisor, San Luis Obispo County
5	Crease, Fray	Manager, Santa Barbara County Water Agency
6	Huckaby, Jeff	President, Grimmway Farms
7	Jaffe, Roberta	Chair, Cuyama Basin Groundwater Sustainability Agency Standing Advisory Committee
8	Kelly, Brenton	Watershed Steward, Quail Springs Permaculture Farm
9	Post, Mike	Executive Director, Chimineas Ranch Foundation
10	Shephard, Glenn	Director, Water Protection District, County of Ventura
11	Vickery, Vivian	General Manager, Cuyama Community Services District
12	Walsh, Casey	Professor and Chair, Department of Anthropology, UC Santa Barbara
13	Yurosek, Derek	Board President, Cuyama Basin Water District

TO: Board of Directors
Agenda Item No. 6c

FROM: Brian Van Lienden, Woodard & Curran

DATE: November 6, 2019

SUBJECT: Direction on Field Work Locations

Issue
Update on monitoring sensors and direction on stream gage locations.

Recommended Motion
None – looking for Board direction.

Discussion
Stream Gages
A component of the surface monitoring network includes the installation of two stream gages on the Cuyama River. The Cuyama Basin Groundwater Sustainability Agency technical consultant Woodard & Curran (W&C) identified five potential locations along the river and are recommending locations one (1) and three (3) for the stream gages as shown in Attachment 1. Staff, along with legal counsel review, determined that the installation of these stream gages qualify for a categorical exemption under the California Environmental Quality Act. The cost for these stream gages, along with the installation of 10 transducers, has been budgeted in the FY 19-20 budget under the line item "Category 1 (funded) – field work" for $180,000. The schedule for this work is provided as Attachment 2.

Groundwater Monitoring Sensors (Transducers)
As part of the groundwater monitoring network, W&C will be overseeing the installation of 10 transducers in well locations in the monitoring network. W&C is still selecting locations, but the proposed sites are shown in Attachment 1.

Cuyama Basin Groundwater Sustainability Agency

Review of Field Work Locations

November 6, 2019

WOODARD &CURRAN

Monitoring and Adaptive Management Program Implementation Under DWR Grant Agreement

- Current Proposition 1 grant agreement with California Dept of Water Resources includes funding for Monitoring and Adaptive Management Program Implementation
- This includes the following activities:
  - Equipping ten wells with continuous telemetered monitoring sensors
  - Evapotranspiration evaluation for the Cuyama Basin (already completed)
  - Installation of two surface water flow gauges at locations lacking monitoring
  - Three stakeholder meetings to discuss the above activities (already completed)

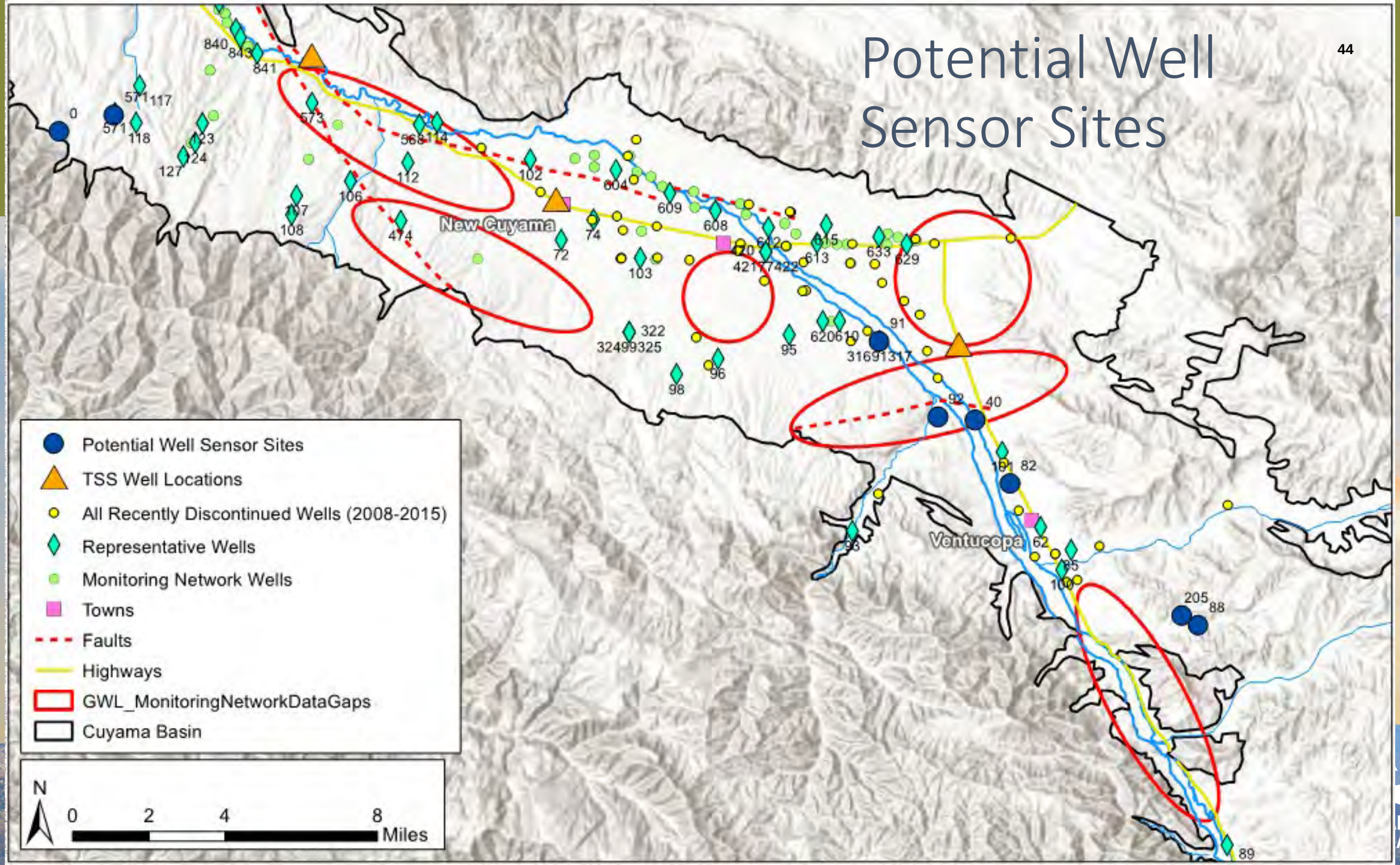
WOODARD &CURRAN

Groundwater Monitoring Well Sensors

- Monitoring sensors will be installed in 10 existing monitoring wells
- Process for selection of monitoring wells:
  - Email solicitation was sent out requesting monitoring well participants who would agree to have their wells included in the monitoring well network
    - To date, we have responses for 4 proposed locations
  - Additional proposed installation locations have been selected from wells that were recently discontinued
  - Potential locations are shown in the map on the next page
- Selection of specific site locations does not require Board approval

WOODARD &CURRAN

Potential Well Sensor Sites



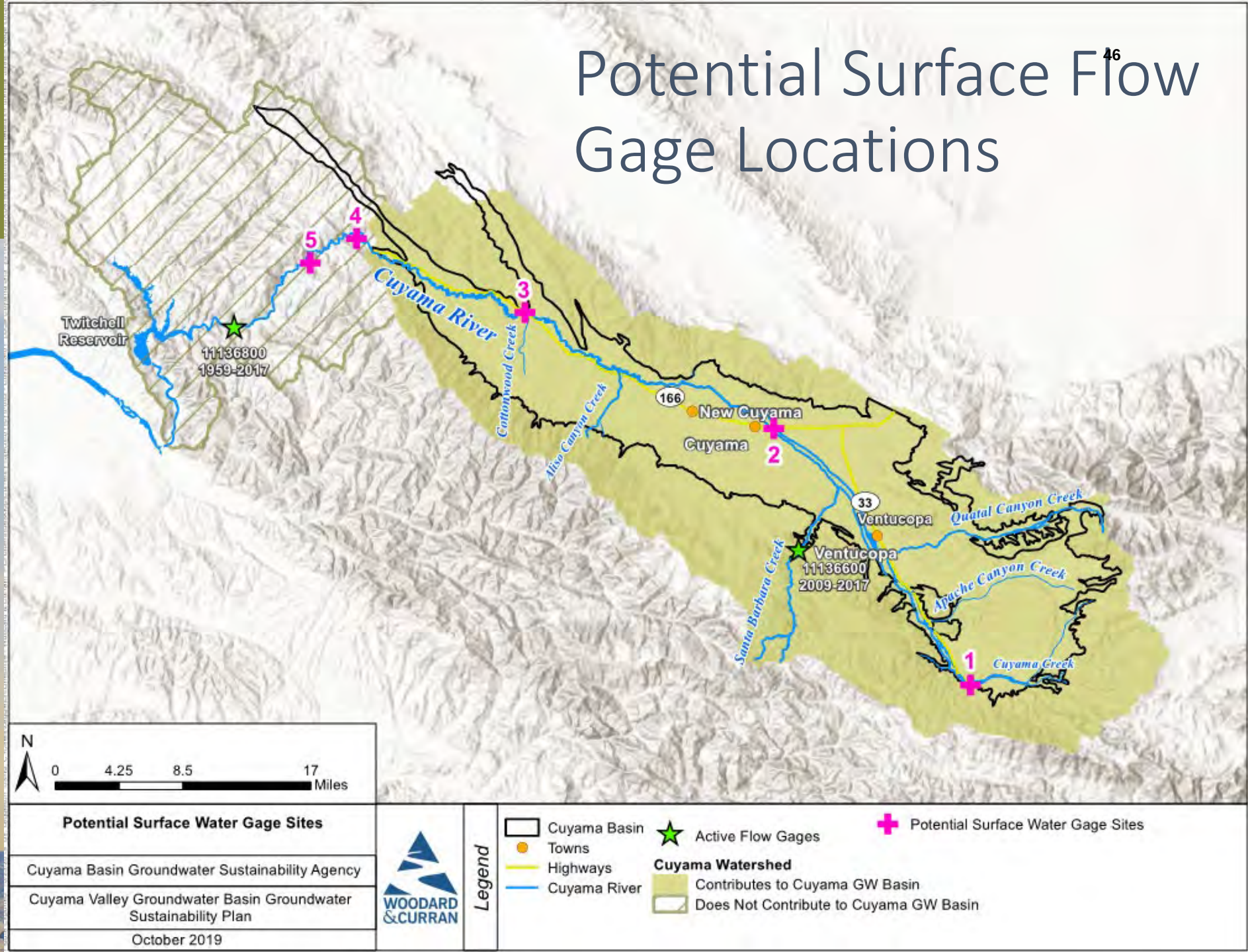
Recommendation for Surface Flow Gage Locations

- Two surface flow gages will be installed
- We will contract with the USGS to install the wells and perform maintenance for the first year
- Five potential locations on the Cuyama River were investigated by the project team
  - The map on the next slide shows these 5 locations and the 2 staff recommended locations
  - Staff recommends installation of USGS flow gages at locations #1 and #3

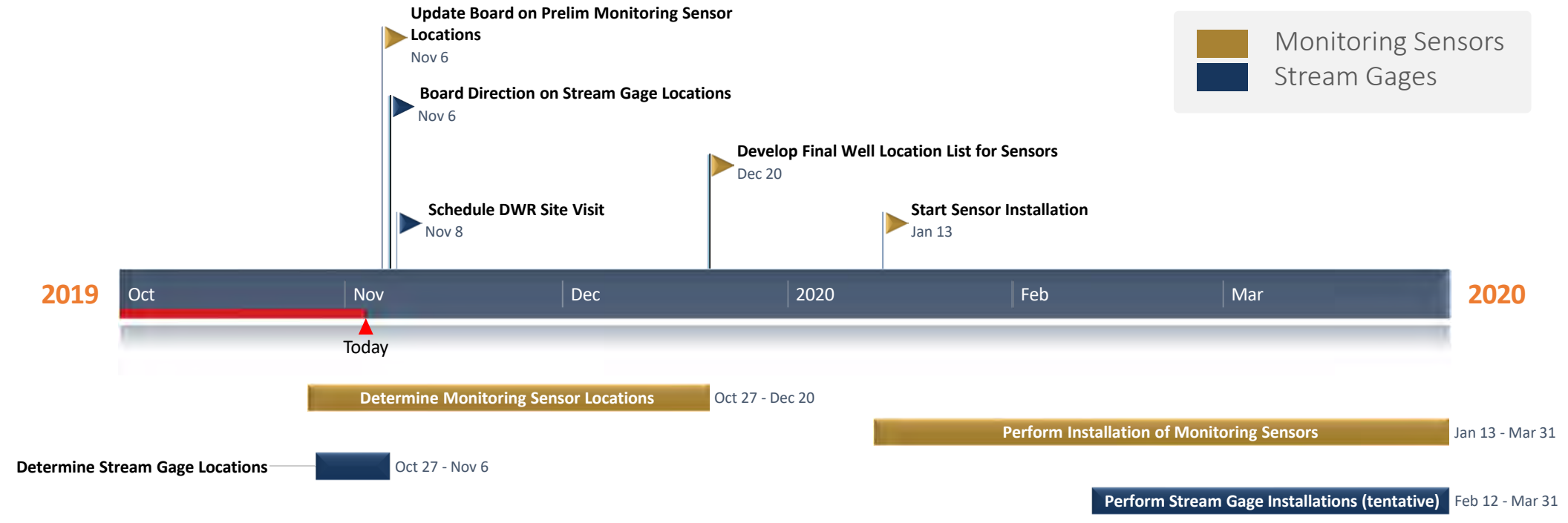
WOODARD &CURRAN

Potential Surface Flow Gage Locations

- Five locations were investigated
- Staff recommends installation of USGS flow gages at Locations #1 and #3



CBGSA FIELD WORK SCHEDULE



HALLMARK GROUP Capital Program Management

TO: Board of Directors
Agenda Item No. 7a

FROM: Jim Beck, Executive Director

DATE: November 6, 2019

SUBJECT: Report of the Executive Director

Issue
Report of the Executive Director.

Recommended Motion
None – information only.

Discussion
December 4, 2019 Board Meeting
Below is a list of agenda items scheduled for the joint Board and Standing Advisory Committee meeting on December 4, 2019 Board meeting. As a reminder, we will be electing officers at the first meeting after Jan 1 (per the Joint Exercise Powers Agreement) which is tentatively scheduled for February 5, 2019.

- Final GSP adoption
- Annual report timeline and components
- Economic report presentation
- Monitoring network staging
- DWR TSS update
- Prop 68 application update
- IRWM Grant program participation
- Set annual meetings
- Hallmark Group and Woodard & Curran task orders (Feb through June 2020)
- Audit update

TO: Board of Directors
Agenda Item No. 7b

FROM: Jim Beck, Executive Director

DATE: November 6, 2019

SUBJECT: Progress & Next Steps

Issue
Report on the progress and next steps for Cuyama Basin Groundwater Sustainability Agency activities.

Recommended Motion
None – information only.

Discussion
A presentation on the progress and next steps for Cuyama Basin Groundwater Sustainability Agency activities is provided as Attachment 1.

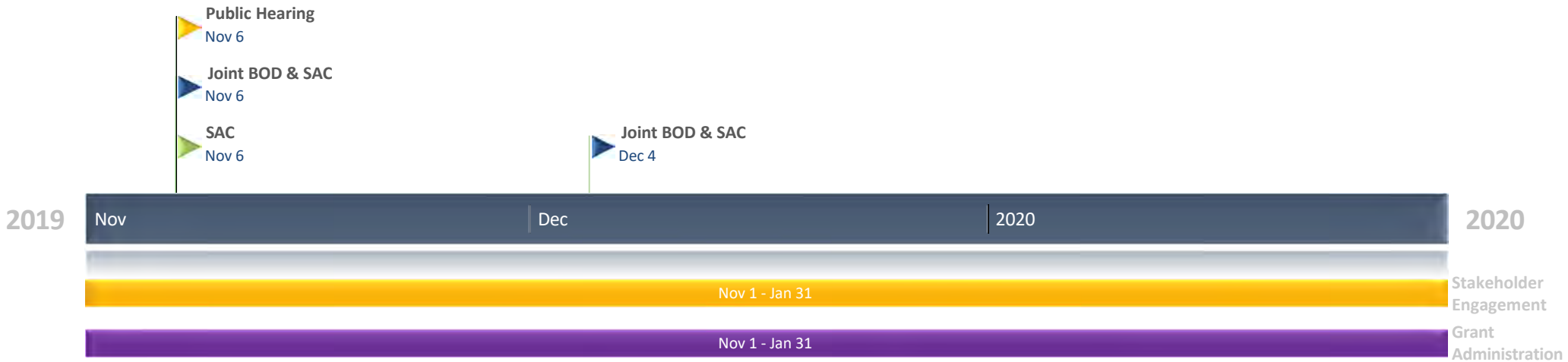
Cuyama Basin Groundwater Sustainability Agency

Progress & Next Steps

November 6, 2019

Cuyama Basin Groundwater Sustainability Agency

Near-Term Schedule



Aug/Sep 2019 Accomplishments & Next Steps

Accomplishments

- ✓ Ongoing administration of the CBGSA
- ✓ Ongoing administration of DWR Grant
- ✓ Met with CBWD Management Agreement Ad Hoc
- ✓ Worked with ad hoc to develop groundwater extraction fee

Next Steps

- Coordinate GSP public comments with W&C
- Assist in preparation of Prop 68 Application
- Meet with DWR TSS Ad Hoc to finalize application
- Continue Engagement with Audit Firm

TO: Board of Directors
Agenda Item No. 8a

FROM: Jim Beck, Executive Director

DATE: November 6, 2019

SUBJECT: Financial Management Overview

Issue
Overview of the financial management for Cuyama Basin Groundwater Sustainability Agency activities.

Recommended Motion
None – information only.

Discussion
A presentation on the financial management for Cuyama Basin Groundwater Sustainability Agency activities is provided as Attachment 1.

Cuyama Basin Groundwater Sustainability Agency

Financial Report

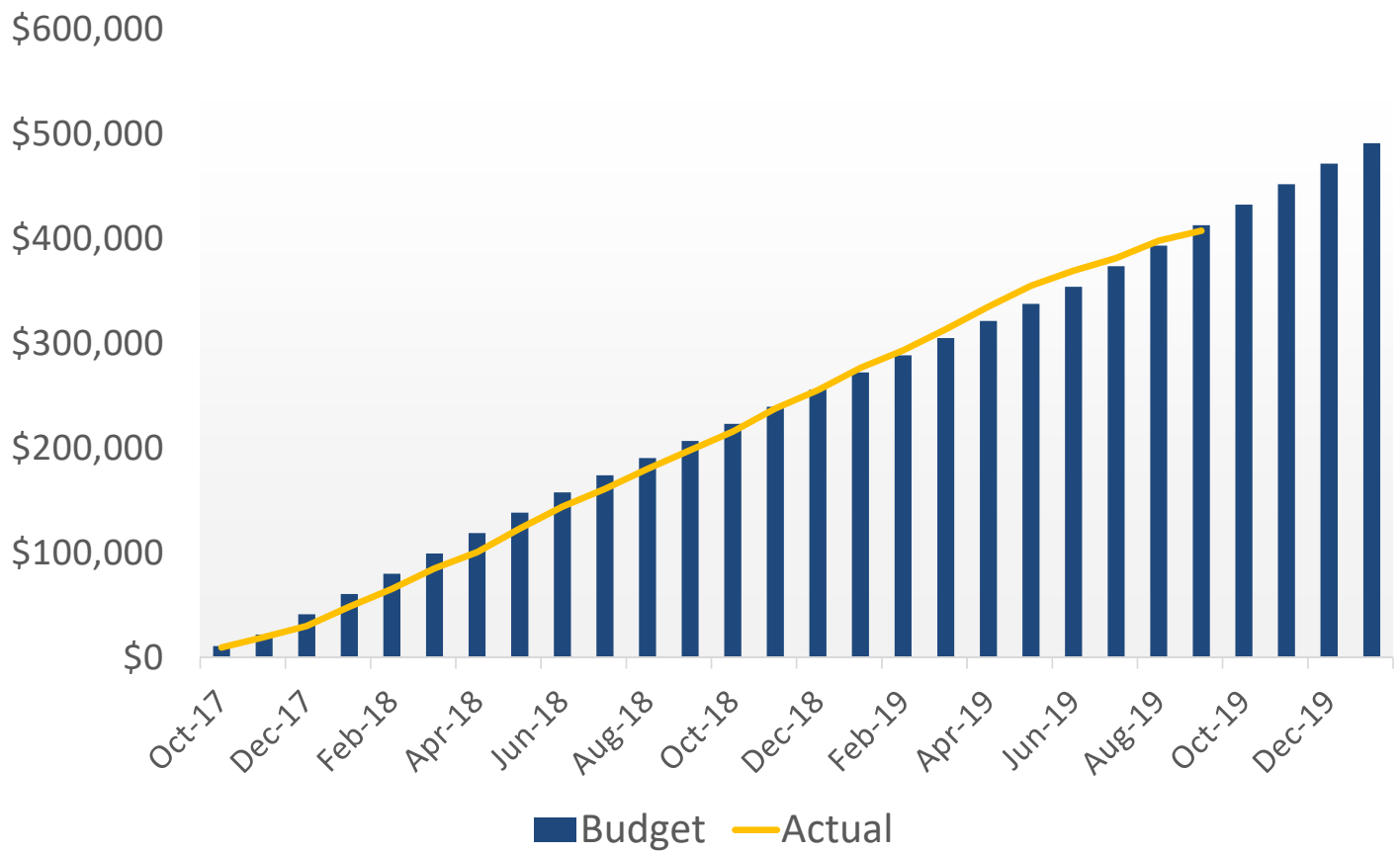
November 6, 2019

CBGSA OUTSTANDING INVOICES

Task	Invoiced Through	Cumulative Total
Legal Counsel (Klein)	9/19/2019	$17,887
Executive Director (HG)	9/30/2019	$38,243
GSP Development (W&C)	5/31/2019	$212,869
TOTAL		$268,999

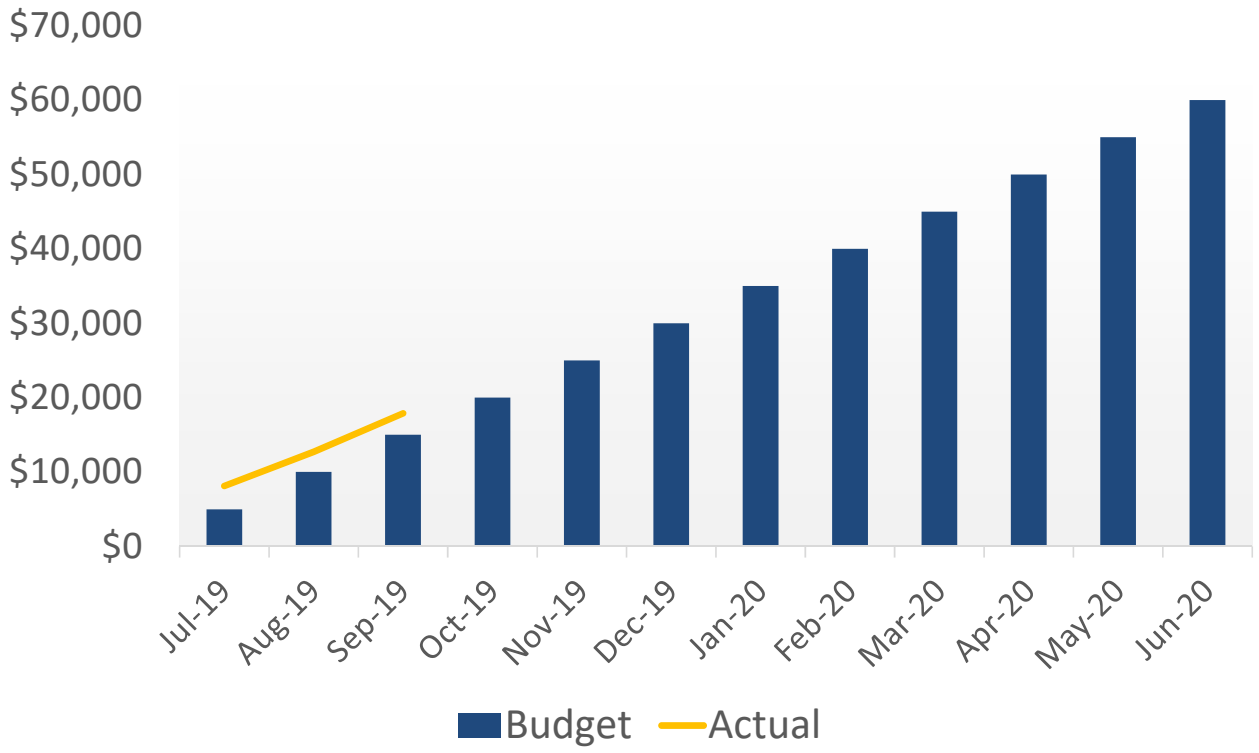
Hallmark Group – Budget-to-Actuals

Task Order Nos. 1-4



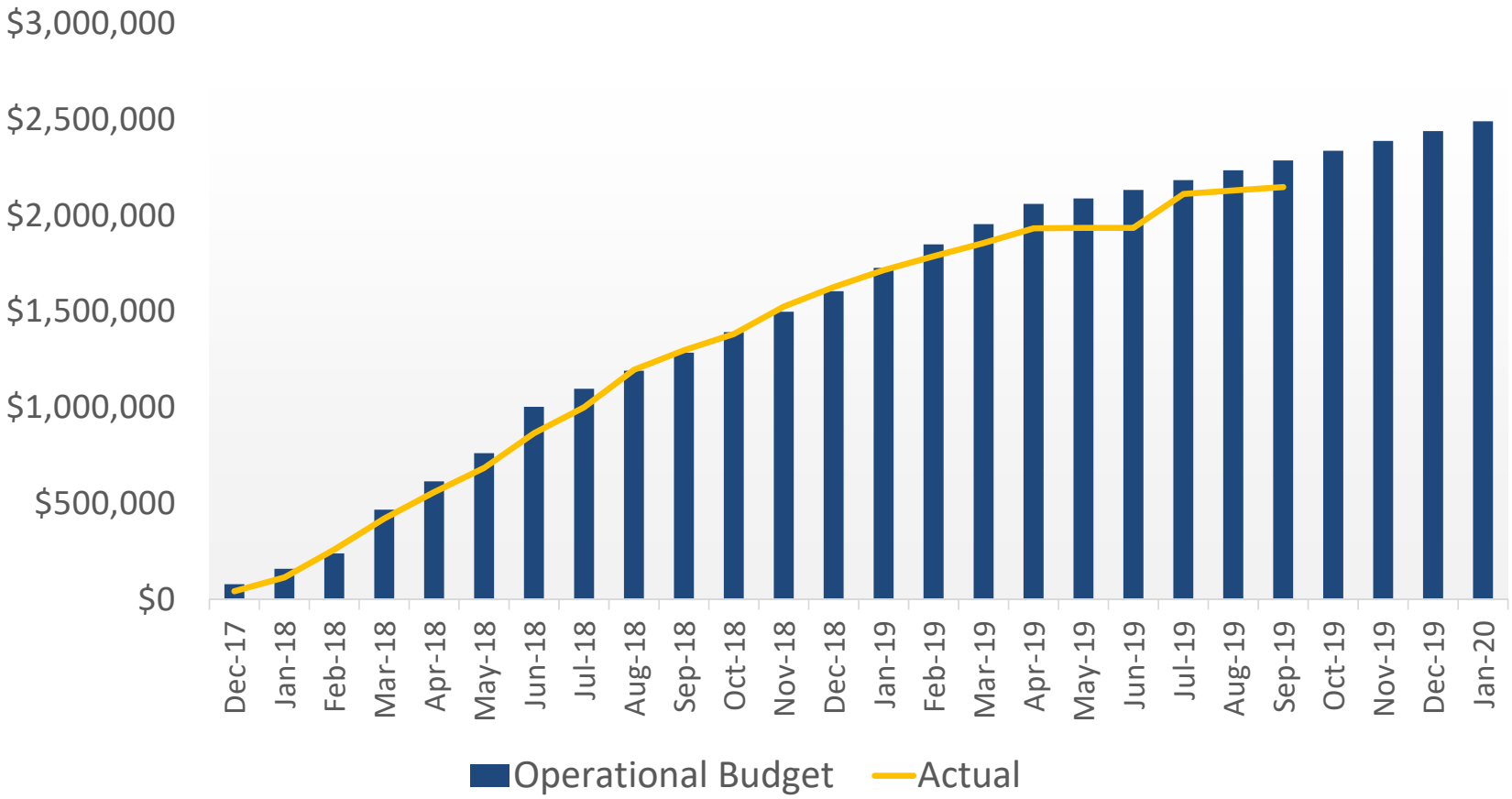
Legal Counsel – Budget-to-Actuals

FY 19-20



Woodard & Curran – Budget-to-Actuals

Task Order Nos. 1-6



TO: Board of Directors
Agenda Item No. 8b

FROM: Jim Beck, Executive Director

DATE: November 6, 2019

SUBJECT: Financial Report

Issue
Financial Report

Recommended Motion
None – information only.

Discussion
The Cuyama Basin Groundwater Sustainability Agency's financial reports for July, August and September 2019 are provided as Attachment 1.

The reports include:

- Statement of Financial Position
- Receipts and Disbursements
- A/R Aging Summary
- A/P Aging Summary
- Statement of Operations with Budget Variance
- Statement of Financial Position with Prior Year Comparison

Cuyama Basin GSA

Financial Statements

September 2019

CUYAMA BASIN GSA
Statement of Financial Position
As of September 30, 2019

	Sep 30, 19	Sep 30, 18	$ Change	% Change
ASSETS				
Current Assets				
Checking/Savings				
Chase - General Checking	51,189	35,451	15,738	44%
Total Checking/Savings	51,189	35,451	15,738	44%
Accounts Receivable				
Accounts Receivable	204,400	65,449	138,951	212%
Total Accounts Receivable	204,400	65,449	138,951	212%
Other Current Assets				
Grant Retention Receivable	184,777	0	184,777	100%
Total Other Current Assets	184,777	0	184,777	100%
Total Current Assets	440,366	100,900	339,466	336%
TOTAL ASSETS	**440,366**	**100,900**	**339,466**	**336%**
LIABILITIES & EQUITY				
Liabilities				
Current Liabilities				
Accounts Payable				
Accounts Payable	268,999	674,295	-405,295	-60%
Total Accounts Payable	268,999	674,295	-405,295	-60%
Total Current Liabilities	268,999	674,295	-405,295	-60%
Total Liabilities	268,999	674,295	-405,295	-60%
Equity				
Unrestricted Net Assets	213,445	-110,130	323,576	294%
Net Income	-42,079	-463,264	421,185	91%
Total Equity	171,367	-573,394	744,761	130%
TOTAL LIABILITIES & EQUITY	**440,366**	**100,900**	**339,466**	**336%**

CUYAMA BASIN GSA
Receipts and Disbursements
As of September 30, 2019

Type	Date	Num	Name	Debit	Credit
Chase - General Checking					
Check	07/03/2019	Fees	Chase Bank		95.00
Check	08/05/2019	Fees	Chase Bank		95.00
Payment	08/14/2019	04-010669	Department of Water Resources	1,458,594.22	
Bill Pmt -Check	08/19/2019	1016	HGCPM, Inc.		197,193.71
Bill Pmt -Check	08/19/2019	1017	Klein, DeNatale, Goldner		16,443.82
Bill Pmt -Check	08/19/2019	1018	Woodard & Curran		1,221,972.77
Total Chase - General Checking				1,458,594.22	1,435,800.30
TOTAL				**1,458,594.22**	**1,435,800.30**

CUYAMA BASIN GSA
A/R Aging Summary
As of September 30, 2019

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
Department of Water Resources	204,400	0	0	0	0	204,400
TOTAL	**204,400**	**0**	**0**	**0**	**0**	**204,400**

CUYAMA BASIN GSA
A/P Aging Summary
As of September 30, 2019

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
HGCPM, Inc.	9,488	16,548	12,207	0	0	38,243
Klein, DeNatale, Goldner	5,172	4,584	8,130	0	0	17,887
Woodard & Curran	17,742	18,426	176,701	0	0	212,869
TOTAL	**32,401**	**39,559**	**197,039**	**0**	**0**	**268,999**

CUYAMA BASIN GSA
Statement of Operations with Budget Variance
July through September 2019

	Jul - Sep 19	Budget	$ Over Budget	% of Budget
Ordinary Income/Expense				
Income				
Direct Public Funds				
Grants	227,111	228,918	-1,807	99%
Total Direct Public Funds	227,111	228,918	-1,807	99%
Total Income	227,111	228,918	-1,807	99%
Cost of Goods Sold				
Program Expenses				
Category/Component 1				
Technical Assistance	3,806	25,714	-21,908	15%
Total Category/Component 1	3,806	25,714	-21,908	15%
Category/Component 2				
Grant Administration	0	4,996	-4,996	0%
Total Category/Component 2	0	4,996	-4,996	0%
Technical Consulting				
GSP Development	189,151	30,030	159,121	630%
GSP Implementation	3,506	8,076	-4,570	43%
Stakeholder Engagement	4,100	29,685	-25,585	14%
Outreach	4,807	5,529	-722	87%
Total Technical Consulting	201,564	73,320	128,244	275%
Total Program Expenses	205,370	104,030	101,340	197%
Total COGS	205,370	104,030	101,340	197%
Gross Profit	21,741	124,888	-103,147	17%
Expense				
General and Administrative				
GSA Executive Director				
GSA BOD Meetings	15,500	28,290	-12,790	55%
Consult Mgmt and GSP Devel	11,225	7,245	3,980	155%
Financial Information Coor	5,688	8,247	-2,560	69%
CBGSA Outreach	700	4,965	-4,265	14%
GW Extraction Fee	4,150	30,000	-25,850	14%
Travel and Direct Costs	981	363	618	270%
Total GSA Executive Director	38,243	79,110	-40,867	48%
Other Administrative				
Grant Proposals	7,500	10,000	-2,501	75%
Bank Service Fees	190	0	190	100%
Legal	17,887	15,000	2,887	119%
Total Other Administrative	25,576	25,000	576	102%
Total General and Administrative	63,820	104,110	-40,290	61%
Total Expense	63,820	104,110	-40,290	61%
Net Ordinary Income	-42,079	20,778	-62,857	-203%
Net Income	**-42,079**	**20,778**	**-62,857**	**-203%**

CUYAMA BASIN GSA
2019/2020 Operating Budget
July 2019 through June 2020

	Jul '19 - Jun 20
Ordinary Income/Expense	
Income	
Direct Public Funds	
Grants	520,932
Total Direct Public Funds	520,932
Total Income	520,932
Cost of Goods Sold	
Program Expenses	
Category/Component 1	
Technical Assistance	180,000
Total Category/Component 1	180,000
Category/Component 2	
Grant Administration	14,990
Total Category/Component 2	14,990
Technical Consulting	
GSP Development	30,030
GSP Implementation	197,724
Stakeholder Engagement	123,822
Outreach	25,802
Management Area Costs	49,608
Total Technical Consulting	426,986
Total Program Expenses	621,976
Total COGS	621,976
Gross Profit	-101,044
Expense	
General and Administrative	
GSA Executive Director	
GSA BOD Meetings	79,314
Consult Mgmt and GSP Devel	45,801
Financial Information Coor	32,790
CBGSA Outreach	18,738
GW Extraction Fee	60,000
Management Area Admin	15,000
Travel and Direct Costs	1,118
Total GSA Executive Director	252,761
Other Administrative	
Auditing/Accounting Fees	16,000
Grant Proposals	40,000
General Liability Insurance	11,000
Legal	60,000
Other Admin Expense	200
Contingency	20,000
Total Other Administrative	147,200
Total General and Administrative	399,961
Total Expense	399,961
Net Ordinary Income	-501,005
Net Income	**-501,005**

Cuyama Basin GSA

Financial Statements

August 2019

CUYAMA BASIN GSA
Statement of Financial Position
As of August 31, 2019

	Aug 31, 19	Aug 31, 18	$ Change	% Change
ASSETS				
Current Assets				
Checking/Savings				
Chase - General Checking	51,189	35,546	15,643	44%
Total Checking/Savings	51,189	35,546	15,643	44%
Accounts Receivable				
Accounts Receivable	204,400	65,449	138,951	212%
Total Accounts Receivable	204,400	65,449	138,951	212%
Other Current Assets				
Grant Retention Receivable	184,777	0	184,777	100%
Total Other Current Assets	184,777	0	184,777	100%
Total Current Assets	440,366	100,995	339,371	336%
TOTAL ASSETS	**440,366**	**100,995**	**339,371**	**336%**
LIABILITIES & EQUITY				
Liabilities				
Current Liabilities				
Accounts Payable				
Accounts Payable	236,598	552,811	-316,213	-57%
Total Accounts Payable	236,598	552,811	-316,213	-57%
Total Current Liabilities	236,598	552,811	-316,213	-57%
Total Liabilities	236,598	552,811	-316,213	-57%
Equity				
Unrestricted Net Assets	213,445	-110,130	323,576	294%
Net Income	-9,677	-341,685	332,008	97%
Total Equity	203,768	-451,815	655,583	145%
TOTAL LIABILITIES & EQUITY	**440,366**	**100,995**	**339,371**	**336%**

CUYAMA BASIN GSA
Receipts and Disbursements
As of August 31, 2019

Type	Date	Num	Name	Debit	Credit
Chase - General Checking					
Check	08/05/2019	Fees	Chase Bank		95.00
Payment	08/14/2019	04-010669	Department of Water Resources	1,458,594.22	
Bill Pmt -Check	08/19/2019	1016	HGCPM, Inc.		197,193.71
Bill Pmt -Check	08/19/2019	1017	Klein, DeNatale, Goldner		16,443.82
Bill Pmt -Check	08/19/2019	1018	Woodard & Curran		1,221,972.77
Total Chase - General Checking				1,458,594.22	1,435,705.30
TOTAL				**1,458,594.22**	**1,435,705.30**

CUYAMA BASIN GSA
A/R Aging Summary
As of August 31, 2019

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
Department of Water Resources	204,400	0	0	0	0	204,400
TOTAL	**204,400**	**0**	**0**	**0**	**0**	**204,400**

CUYAMA BASIN GSA
A/P Aging Summary
As of August 31, 2019

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
HGCPM, Inc.	16,548	12,207	0	0	0	28,756
Klein, DeNatale, Goldner	4,584	8,130	0	0	0	12,715
Woodard & Curran	18,426	176,701	0	0	0	195,127
TOTAL	**39,559**	**197,039**	**0**	**0**	**0**	**236,598**

CUYAMA BASIN GSA
Statement of Operations with Budget Variance
July through August 2019

	Jul - Aug 19	Budget	$ Over Budget	% of Budget
Ordinary Income/Expense				
Income				
Direct Public Funds				
Grants	227,111	0	227,111	100%
Total Direct Public Funds	227,111	0	227,111	100%
Total Income	227,111	0	227,111	100%
Cost of Goods Sold				
Program Expenses				
Category/Component 1				
Technical Assistance	2,139	0	2,139	100%
Total Category/Component 1	2,139	0	2,139	100%
Category/Component 2				
Grant Administration	0	2,498	-2,498	0%
Total Category/Component 2	0	2,498	-2,498	0%
Technical Consulting				
GSP Development	184,624	30,030	154,594	615%
GSP Implementation	798	5,384	-4,586	15%
Stakeholder Engagement	4,100	19,790	-15,690	21%
Outreach	2,935	3,686	-751	80%
Total Technical Consulting	192,456	58,890	133,566	327%
Total Program Expenses	194,595	61,388	133,207	317%
Total COGS	194,595	61,388	133,207	317%
Gross Profit	32,515	-61,388	93,903	-53%
Expense				
General and Administrative				
GSA Executive Director				
GSA BOD Meetings	14,713	18,860	-4,148	78%
Consult Mgmt and GSP Devel	6,325	4,830	1,495	131%
Financial Information Coor	4,688	5,498	-811	85%
CBGSA Outreach	500	3,310	-2,810	15%
GW Extraction Fee	1,738	20,000	-18,263	9%
Travel and Direct Costs	793	242	551	328%
Total GSA Executive Director	28,756	52,740	-23,984	55%
Other Administrative				
Grant Proposals	532	0	532	100%
Bank Service Fees	190	0	190	100%
Legal	12,715	10,000	2,715	127%
Total Other Administrative	13,437	10,000	3,437	134%
Total General and Administrative	42,193	62,740	-20,547	67%
Total Expense	42,193	62,740	-20,547	67%
Net Ordinary Income	-9,677	-124,128	114,451	8%
Net Income	**-9,677**	**-124,128**	**114,451**	**8%**

CUYAMA BASIN GSA
2019/2020 Operating Budget
July 2019 through June 2020

	Jul '19 - Jun 20
Ordinary Income/Expense	
Income	
Direct Public Funds	
Grants	520,932
Total Direct Public Funds	520,932
Total Income	520,932
Cost of Goods Sold	
Program Expenses	
Category/Component 1	
Technical Assistance	180,000
Total Category/Component 1	180,000
Category/Component 2	
Grant Administration	14,990
Total Category/Component 2	14,990
Technical Consulting	
GSP Development	30,030
GSP Implementation	197,724
Stakeholder Engagement	123,822
Outreach	25,802
Management Area Costs	49,608
Total Technical Consulting	426,986
Total Program Expenses	621,976
Total COGS	621,976
Gross Profit	-101,044
Expense	
General and Administrative	
GSA Executive Director	
GSA BOD Meetings	79,314
Consult Mgmt and GSP Devel	45,801
Financial Information Coor	32,790
CBGSA Outreach	18,738
GW Extraction Fee	60,000
Management Area Admin	15,000
Travel and Direct Costs	1,118
Total GSA Executive Director	252,761
Other Administrative	
Auditing/Accounting Fees	16,000
Grant Proposals	40,000
General Liability Insurance	11,000
Legal	60,000
Other Admin Expense	200
Contingency	20,000
Total Other Administrative	147,200
Total General and Administrative	399,961
Total Expense	399,961
Net Ordinary Income	-501,005
Net Income	**-501,005**

Cuyama Basin GSA

Financial Statements

July 2019

CUYAMA BASIN GSA
Statement of Financial Position
As of July 31, 2019

	Jul 31, 19	Jul 31, 18	$ Change	% Change
ASSETS				
Current Assets				
Checking/Savings				
Chase - General Checking	28,300	32,564	-4,264	-13%
Total Checking/Savings	28,300	32,564	-4,264	-13%
Accounts Receivable				
Accounts Receivable	1,458,594	37,831	1,420,763	3,756%
Total Accounts Receivable	1,458,594	37,831	1,420,763	3,756%
Other Current Assets				
Grant Retention Receivable	162,066	0	162,066	100%
Total Other Current Assets	162,066	0	162,066	100%
Total Current Assets	1,648,961	70,395	1,578,565	2,242%
TOTAL ASSETS	**1,648,961**	**70,395**	**1,578,565**	**2,242%**
LIABILITIES & EQUITY				
Liabilities				
Current Liabilities				
Accounts Payable				
Accounts Payable	1,632,649	335,145	1,297,504	387%
Total Accounts Payable	1,632,649	335,145	1,297,504	387%
Total Current Liabilities	1,632,649	335,145	1,297,504	387%
Total Liabilities	1,632,649	335,145	1,297,504	387%
Equity				
Unrestricted Net Assets	213,445	-110,130	323,576	294%
Net Income	-197,134	-154,619	-42,514	-28%
Total Equity	16,311	-264,750	281,061	106%
TOTAL LIABILITIES & EQUITY	**1,648,961**	**70,395**	**1,578,565**	**2,242%**

CUYAMA BASIN GSA
Receipts and Disbursements
As of July 31, 2019

Type	Date	Num	Name	Debit	Credit
Chase - General Checking					
Check	07/03/2019	Fees	Chase Bank		95.00
Total Chase - General Checking				0.00	95.00
TOTAL				**0.00**	**95.00**

CUYAMA BASIN GSA
A/R Aging Summary
As of July 31, 2019

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
Department of Water Resources	0	0	1,458,594	0	0	1,458,594
TOTAL	**0**	**0**	**1,458,594**	**0**	**0**	**1,458,594**

CUYAMA BASIN GSA
A/P Aging Summary
As of July 31, 2019

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
HGCPM, Inc.	12,207	14,269	20,029	21,409	141,486	209,401
Klein, DeNatale, Goldner	8,130	5,898	4,552	1,635	4,358	24,574
Woodard & Curran	176,701	0	2,502	76,406	1,143,065	1,398,674
TOTAL	**197,039**	**20,168**	**27,084**	**99,449**	**1,288,910**	**1,632,649**

CUYAMA BASIN GSA
Statement of Operations with Budget Variance
July 2019

	Jul 19	Budget	$ Over Budget	% of Budget
Ordinary Income/Expense				
Cost of Goods Sold				
Program Expenses				
Technical Consulting				
GSP Development	176,701	30,030	146,671	588%
GSP Implementation	0	2,692	-2,692	0%
Stakeholder Engagement	0	9,895	-9,895	0%
Outreach	0	1,843	-1,843	0%
Total Technical Consulting	176,701	44,460	132,241	397%
Total Program Expenses	176,701	44,460	132,241	397%
Total COGS	176,701	44,460	132,241	397%
Gross Profit	-176,701	-44,460	-132,241	397%
Expense				
General and Administrative				
GSA Executive Director				
GSA BOD Meetings	7,625	9,430	-1,805	81%
Consult Mgmt and GSP Devel	2,138	2,415	-278	89%
Financial Information Coor	1,863	2,749	-887	68%
CBGSA Outreach	200	1,655	-1,455	12%
GW Extraction Fee	0	10,000	-10,000	0%
Travel and Direct Costs	382	121	261	316%
Total GSA Executive Director	12,207	26,370	-14,163	46%
Other Administrative				
Bank Service Fees	95	0	95	100%
Legal	8,130	5,000	3,130	163%
Total Other Administrative	8,225	5,000	3,225	165%
Total General and Administrative	20,433	31,370	-10,937	65%
Total Expense	20,433	31,370	-10,937	65%
Net Ordinary Income	-197,134	-75,830	-121,304	260%
Net Income	**-197,134**	**-75,830**	**-121,304**	**260%**

CUYAMA BASIN GSA
2019/2020 Operating Budget
July 2019 through June 2020

	Jul '19 - Jun 20
Ordinary Income/Expense	
Income	
Direct Public Funds	
Grants	520,932
Total Direct Public Funds	520,932
Total Income	520,932
Cost of Goods Sold	
Program Expenses	
Category/Component 1	
Technical Assistance	180,000
Total Category/Component 1	180,000
Category/Component 2	
Grant Administration	14,990
Total Category/Component 2	14,990
Technical Consulting	
GSP Development	30,030
GSP Implementation	197,724
Stakeholder Engagement	123,822
Outreach	25,802
Management Area Costs	49,608
Total Technical Consulting	426,986
Total Program Expenses	621,976
Total COGS	621,976
Gross Profit	-101,044
Expense	
General and Administrative	
GSA Executive Director	
GSA BOD Meetings	79,314
Consult Mgmt and GSP Devel	45,801
Financial Information Coor	32,790
CBGSA Outreach	18,738
GW Extraction Fee	60,000
Management Area Admin	15,000
Travel and Direct Costs	1,118
Total GSA Executive Director	252,761
Other Administrative	
Auditing/Accounting Fees	16,000
Grant Proposals	40,000
General Liability Insurance	11,000
Legal	60,000
Other Admin Expense	200
Contingency	20,000
Total Other Administrative	147,200
Total General and Administrative	399,961
Total Expense	399,961
Net Ordinary Income	-501,005
Net Income	**-501,005**

TO: Board of Directors
Agenda Item No. 8c

FROM: Jim Beck, Executive Director

DATE: November 6, 2019

SUBJECT: Payment of Bills

Issue
Consider approving the payment of bills for July, August, and September 2019.

Recommended Motion
Approve payment of the bills for the months of July, August and September 2019 in the amount of $268,999.44.

Discussion
Consultant invoices for the months of July, August, and September 2019 are provided as Attachment 1.

HALLMARK GROUP Capital Program Management

1901 Royal Oaks Drive
Suite 200
Sacramento, CA 95815

916 923.1500
hgcpm.com

INVOICE

To: **Cuyama Basin GSA**
c/o Jim Beck
4900 California Avenue, Ste B
Bakersfield, CA 93309

Please Remit To: **Hallmark Group**
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815
P: (916) 923-1500

Invoice No.: 2019-CB-TO3-07
Task Order: CB-HG-003
Agreement No. 201709-CB-001
Date: August 12, 2019

For professional services rendered for the month of July 2019

Task Order	Sub Task	Task Description	Billing Classification	Hours	Rate	Amount
CB-HG-003	1	GSA Board of Directors and Advisory Committee Meetings	Executive Director	20.00	$ 250.00	$ 5,000.00
			Project Coordinator/Admin	26.25	$ 100.00	$ 2,625.00
					Total Sub Task 1 Labor	**$ 7,625.00**
CB-HG-003	2	Consultant Management and GSP Development	Executive Director	6.25	$ 250.00	$ 1,562.50
			Project Coordinator/Admin	5.75	$ 100.00	$ 575.00
					Total Sub Task 2 Labor	**$ 2,137.50**
CB-HG-003	3	Financial Information Coordination	Executive Director	0.25	$ 250.00	$ 62.50
			Project Controls	4.50	$ 200.00	$ 900.00
			Project Coordinator/Admin	9.00	$ 100.00	$ 900.00
					Total Sub Task 3 Labor	**$ 1,862.50**
CB-HG-003	4	CBGSA Outreach	Executive Director	0.00	$ 250.00	$ -
			Project Coordinator/Admin	2.00	$ 100.00	$ 200.00
					Total Sub Task 4 Labor	**$ 200.00**
					Total Labor	**$ 11,825.00**
		Travel	7/10/2019			$ 67.58
		Other Direct Costs:	Conference Calls			$ 257.26
			Printing Costs			$ 42.50
					SubTotal Travel and Other Direct Costs	**$ 367.34**
		ODC Mark Up			5%	$ 14.99
					Total Travel and Other Direct Costs	**$ 382.33**
					TOTAL AMOUNT DUE FOR THIS INVOICE	**$ 12,207.33**

Task Order	Original Totals	Amendment(s)	Total Committed	Previously Billed	Current Billing	Remaining Balance
CB-HG-003	$ 212,810.00	$ -	$ 212,810.00	$ 110,212.50	$ 11,825.00	$ 90,772.50
Travel and ODC	$ -	$ -	$ -	$ 3,728.41	$ 382.33	$ (4,110.74)
Total	$ 212,810.00	$ -	$ 212,810.00	$ 113,940.91	$ 12,207.33	$ 86,661.76

HALLMARK GROUP Capital Program Management

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

PROGRESS REPORT FOR TASK ORDER CB-HG-003

Client Name:	Cuyama Basin Groundwater Sustainability Agency	**Agreement Number:**	201709-CB-001
Company Name:	HGCPM, Inc. DBA The Hallmark Group	**Address:**	1901 Royal Oaks Drive, Suite 200 Sacramento, CA 95815
Task Order Number:	CB-HG-003	**Report Period:**	July 1-31, 2019
Progress Report Number:	7	**Project Manager:**	Jim Beck
Invoice Number:	2019-CB-TO3-07	**Invoice Date:**	August 12, 2019

SUMMARY OF WORK PERFORMED

Task 1: Board and Standing Advisory Committee Meeting Facilitation

- Prepared for and attended monthly Cuyama Basin Groundwater Sustainability Agency (CBGSA) Standing Advisory Committee (SAC) and Board meetings.
- Drafted, prepared, and distributed documents for the CBGSA SAC and Board of Directors meeting packets.
- Drafted CBGSA SAC and Board minutes.
- Drafted, reviewed, and discussed SAC and Board agendas.
- Coordinated, prepared for, and attended meeting with D. Yurosek, A. Doud, and J. Hughes regarding the principles of agreement between the CBGSA and the Cuyama Basin Water District (CBWD) for the administration and management of the Central Region management area of the CBGSA.

Task 2: GSP Consultant Management and GSP Development

- Prepared for, met with, and facilitated CBGSA Program Management Team (PMT) on a weekly basis to discuss GSP section progress and outreach.

Task 3: Financial Management

- Developed materials and submitted the Prop 1 SGWP Grant Progress Report No. 3.
- Reviewed, revised, and executed audit engagement letter with Daniells Phillips Vaughan & Bock.
- Coordinated, prepared for, and attended meeting with W&C to review and discuss budget on July 9, 2019.
- Coordinated, prepared for, and attended meeting to discuss the cost allocation strategy with D. Yurosek, J. Hughes, and W&C on July 10, 2019.
- Coordinated, prepared for, and attended meeting with R. Jaffe and B. Kelly to discuss future SAC administration, responsibilities, and cost-saving opportunities on July 30, 2019.

- Coordinated, prepared for, and attended meeting to develop Task Order with Woodard & Curran (W&C) on July 31, 2019.
- General accounting and preparation of monthly financial statements.

Task 4: Stakeholder Outreach Facilitation

- Coordinated the update of the Cuyama Basin Groundwater Sustainability Agency (CBGSA) website with Board and Standing Advisory Committee minutes, agendas, GSP chapters, and GSP presentations.
- Updated CBGSA public stakeholder contact list.

DELIVERABLES AND COMPLETED TASKS

- Developed CBGSA Board agenda for July 10, 2019.
- Attended CBGSA Board meeting on July 10, 2019.
- Drafted meeting minutes for CBGSA Board meeting on July 10, 2019.
- Prepared for, met with, and facilitate CBGSA program management team on a weekly basis.

PLANNED OBJECTIVES FOR NEXT REPORTING PERIOD

- Prepare for and attend CBGSA Board meeting on August 7, 2019.

SIGNIFICANT ISSUES OR CHALLENGES (IF ANY) AND POTENTIAL RESOLUTIONS

- N/A

Date: 8/2/2019
Invoice: 40713
HGCPM, Inc. - Formerly Advance Education
Due Upon Receipt **$ 775.20**

HGCPM, Inc. - Formerly Advance Education
1901 Royal Oaks Dr
STE 200
Sacramento, CA 95815 -4235

Please Remit To:
Great America Networks Conferencing
1441 Branding Lane Suite 200
Downers Grove, IL 60515-1160
1 (877) GET-GAN1

Please Send Coupon with payment, Thanks!

Itemized list of Audio Conferences and Charges

Start Date	Time (CST)	Conference Owner Name	Duration/ Callers	Billed Minutes	Charges
7/5/2019	12:59	Cuyama GSA	45 / 6	197	$9.85
	12:59	1 (661) 333-7091	3	Moderator	

	13:00	1 (661) 395-1000	43	Moderator	
	13:00	1 (415) 793-8420	43	Moderator	
	13:02	1 (661) 333-7091	42	Moderator	
	13:07	1 (415) 524-2290	36	Moderator	
	13:13	1 (530) 405-8800	30	Moderator	
7/5/2019	14:30	Cuyama GSA	3/1	3	$0.15
	14:30	1 (661) 395-1000	3	Moderator	
7/9/2019	17:59	Cuyama BDSAC	9/4	15	$0.75
	17:59	1 (661) 334-0233	5	Moderator	
	18:00	1 (661) 333-7091	8	Moderator	
	18:07	1 (661) 334-0233	1	Moderator	
	18:07	1 (916) 999-8777	1	Moderator	
7/9/2019	18:58	Cuyama BDSAC	30 / 4	117	$5.85
	18:58	1 (661) 333-7091	30	Moderator	
	18:59	1 (661) 334-0233	29	Moderator	
	18:59	1 (916) 999-8777	29	Moderator	
	18:59	1 (925) 858-1340	29	Moderator	
7/10/2019	12:59	Cuyama GSA	48 / 9	282	$14.10
	12:59	1 (661) 334-0233	28	Moderator	
	12:59	1 (925) 627-4112	24	Moderator	
	13:00	1 (661) 333-7091	48	Moderator	
	13:01	1 (916) 999-8777	47	Moderator	
	13:01	1 (661) 395-1000	46	Moderator	
	13:01	1 (661) 330-2610	46	Moderator	
	13:24	1 (925) 627-4112	9	Moderator	
	13:29	1 (661) 334-0233	19	Moderator	
	13:32	1 (925) 858-1340	15	Moderator	
7/10/2019	18:56	Cuyama BDSAC	289 / 17	1667	$83.35
	18:56	1 (661) 766-2369	261	Moderator	
	18:56	1 (650) 759-0535	262	Guest	
	18:59	1 (916) 999-8777	148	Moderator	
	19:01	1 (916) 708-8767	96	Moderator	
	19:02	1 (805) 781-5275	1	Moderator	
	19:03	1 (805) 781-5275	260	Moderator	
	19:04	1 (805) 637-7711	210	Guest	
	19:07	1 (415) 793-8420	47	Moderator	
	19:14	1 (661) 331-6986	262	Guest	
	21:26	1 (530) 405-8800	39	Moderator	
	23:17	1 (650) 759-0535	7	Guest	
	23:24	1 (650) 759-0535	8	Guest	
	23:25	1 (661) 766-2369	20	Moderator	
	23:25	1 (805) 781-5275	19	Moderator	
	23:33	1 (650) 759-0535	11	Guest	
	23:35	1 (530) 405-8800	8	Moderator	
	23:35	1 (661) 331-6986	8	Guest	

7/12/2019	12:59	Cuyama GSA	81 / 6	481	$24.05
	12:59	1 (661) 334-0233	81	Moderator	
	12:59	1 (916) 999-8777	81	Moderator	
	13:00	1 (925) 627-4112	80	Moderator	
	13:00	1 (661) 395-1000	80	Moderator	
	13:00	1 (415) 524-2290	80	Moderator	
	13:01	1 (661) 333-7091	79	Moderator	

7/15/2019	17:27	Cuyama GSA	36 / 5	158	$7.90
	17:27	1 (661) 333-7091	35	Moderator	
	17:30	1 (661) 331-6986	33	Moderator	
	17:30	1 (661) 327-9661	33	Moderator	
	17:34	1 (661) 319-6477	29	Moderator	
	17:34	1 (661) 330-2610	28	Moderator	

7/19/2019	13:29	Cuyama GSA	76 / 5	375	$18.75
	13:29	1 (916) 999-8777	76	Moderator	
	13:30	1 (661) 334-0233	75	Moderator	
	13:30	1 (661) 333-7091	75	Moderator	
	13:31	1 (415) 524-2290	75	Moderator	
	13:31	1 (415) 793-8420	74	Moderator	

	11:58	1 (661) 333-7091	53	Moderator	
	11:58	1 (415) 524-2290	53	Moderator	
	11:59	1 (661) 334-0233	52	Moderator	
	11:59	1 (415) 793-8420	52	Moderator	
	11:59	1 (925) 627-4112	52	Moderator	
	12:00	1 (661) 319-6477	36	Moderator	
	12:01	1 (916) 999-8777	51	Moderator	
7/30/2019	12:55	Cuyama BDSAC	42 / 4	157	$7.85
	12:55	1 (661) 333-7091	42	Moderator	
	12:58	1 (805) 886-7239	39	Moderator	
	12:58	1 (831) 818-2451	39	Moderator	
	13:00	1 (661) 334-0233	37	Moderator	
7/31/2019	13:28	Cuyama GSA	85 / 4	335	$16.75
	13:28	1 (925) 627-4112	85	Moderator	
	13:29	1 (661) 477-3385	84	Moderator	
	13:29	1 (661) 333-7091	84	Moderator	
	13:31	1 (916) 999-8777	82	Moderator	

QuickConnect Audio Charges:		**12,463**	**$623.15**
Recording Charges:			
Tax and Surcharge Description:			
Federal Universal Service Fund	0.2440	$	152.05
Total Due:		**$**	**775.20**

A	Cuyama Charges:		
		5-Jul	$9.85
		5-Jul	$0.15
		9-Jul	$0.75
		9-Jul	$5.85
		10-Jul	$14.10
		10-Jul	$83.35
		12-Jul	$24.05
		15-Jul	$7.90
		19-Jul	$18.75
		29-Jul	$17.45
		30-Jul	$7.85
		31-Jul	$16.75
B	Subtotal		$206.80
C	Total Conf Line Charge		$623.15
D	Total Taxes and Surcharges		$152.05
E	Tax and Surcharges Rate (D/C)		24.4%
F	Tax and Surcharges Incurred by Cuyama (B*E)		$50.46
G	Total Cuyama Charge (B+F)		**$257.26**

CUYAMA PRINTING COSTS

Board- 7/10/19

Document	B&W, or Color	Pages	Rate	Cost
Agenda (Board)	B&W	30	$ 0.10	$ 3.00
Agenda (Public)	B&W	40	$ 0.10	$ 4.00
Spanish Presentations	B&W	48	$ 0.10	$ 4.80
Sign-in Sheet	B&W	1	$ 0.10	$ 0.10
Board Packets	B&W	153	$ 0.10	$ 15.30
			Total Cost	$ 27.20

CUYAMA LANDOWNER PRINTING COSTS

July

Document	B&W, or Color	Pages	Rate	Cost
7/10 Board Packet	B&W	153	$ 0.10	$ 15.30
			Total Cost	$ 15.30

Total Cost	$ 42.50

Project and Person Summary with Expense Detail

Date Range: 7/1/2019 - 7/31/2019

Client / *Project*	*Person*	*Expense Type*	*Date*	*Description*	*Mileage*	*Amount*
Cuyama Basin Groundwater Sustainability Agency						
1708-CBGSA ED	**CBGSA Executive Director Services**					
	Melissa Ballard					***$110.08***
		Mileage			*124.00*	*$67.58*
			7/10/2019	Mileage to Cuyama from Bakersfield (RT) - Board	124.00	$67.58
		Miscellaneous				*$42.50*
			7/31/2019	Printing costs for Board packets, etc.		$42.50
					CBGSA Executive Director Services Subtotal	**$110.08**
					Cuyama Basin Groundwater Sustainability Agency Subtotal	**$110.08**
					Grand Total	***$110.08***

KLEIN, DENATALE, GOLDNER
COOPER, ROSENLIEB & KIMBALL, LLP

4550 CALIFORNIA AVENUE
SECOND FLOOR
BAKERSFIELD, CA 93309

MAILING ADDRESS:
P.O. BOX 11172
BAKERSFIELD, CA 93389-1172
(661) 395-1000
FAX (661) 326-0418
E-MAIL accounting@kleinlaw.com

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY
C/O HALLMARK GROUP
******EMAIL INVOICES******

July 30, 2019
Bill No. 22930-001-147156
JDH

Statement for Period through July 18, 2019

Re: 22930 - CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY
001 GENERAL BUSINESS

Date		Services	Hours	Amount
06/21/19	JDH	PREPARED DRAFT RESPONSES TO COMMENTS; E-MAILED REGARDING SAME; WEEKLY PMT CALL.	2.00	540.00
06/25/19	JDH	TELEPHONE CONFERENCE WITH R. JAFFE REGARDING SAC.	0.20	54.00
06/26/19	JDH	CONFERENCE WITH A. DOUD REGARDING ACREAGE-BASED ASSESSMENTS.	0.60	162.00
06/26/19	JDH	RESEARCHED OTHER GSA'S WITH ACREAGE-BASED ASSESSMENTS.	0.30	81.00
06/26/19	JDH	TELEPHONE CONFERENCE WITH K. MARCH REGARDING ACREAGE-BASED ASSESSMENT CONCERNS.	0.50	135.00
06/26/19	AND	RESEARCHED DEFINITION OF "DE MINIMIS EXTRACTOR" AND IMPLICATIONS OF USE IN SGMA CODE.	1.50	225.00
06/27/19	JDH	TELEPHONE CONFERENCES WITH T. BLAKSLEE.	0.50	135.00
06/27/19	JDH	TELEPHONE CONFERENCE WITH A. DOUD.	0.50	135.00
06/27/19	JDH	ATTENDED JUNE SAC REGULAR MEETING TELEPHONICALLY.	2.20	594.00
06/27/19	AND	DRAFTED MEMORANDUM ON "DE MINIMIS EXTRACTORS" AND IMPLICATIONS OF REFERENCE IN SGMA CODE.	1.40	210.00
06/28/19	JDH	WEEKLY PMT CALL.	1.20	324.00
07/01/19	JDH	TELEPHONE CONFERENCE WITH J. BECK.	0.40	108.00
07/02/19	AND	RESEARCHED LAND BASED ASSESSMENTS AND FEES.	1.30	195.00

KLEIN, DENATALE, GOLDNER, COOPER, ROSENLIEB & KIMBALL, LLP

Bill No. 22930-001-147156 **July 30, 2019** **Page 2**
Client Ref: 22930 - 001

Date		Services	Hours	Amount
07/02/19	JVK	RECEIVED AND REVIEWED E-MAIL FROM J. HUGHES REGARDING NOTICE OF HEARING ON ADOPTION OF GSP; RESEARCHED WATER CODE AND MATERIALS PUBLISHED BY DWR AND OTHER AUTHORITIES REGARDING APPROPRIATE NOTICE; E-MAILED CONCLUSIONS REGARDING NOTICE TO J. HUGHES.	2.40	648.00
07/03/19	JDH	REVIEWED AND REVISED DRAFT POSTCARD AND LETTER TO COUNTIES REGARDING INTENTION TO ADOPT GSP; E-MAILED SAME TO PMT.	1.00	270.00
07/03/19	JVK	CONFERENCE WITH J. HUGHES REGARDING NOTIFICATION LETTER; REVISED DRAFT NOTIFICATION LETTER; EXCHANGED E-MAILS WITH J. HUGHES REGARDING SAME.	1.10	297.00
07/05/19	JDH	WEEKLY PMT CALL; REVIEWED AND REPLIED TO E-MAILS.	1.00	270.00
07/08/19	JDH	E-MAILED COUNTIES REGARDING NOTICE OF HEARING.	0.30	81.00
07/08/19	AND	RESEARCHED SUSTAINABLE GROUNDWATER MANAGEMENT ACT EXTRACTION FEE.	0.90	135.00
07/08/19	AND	RESEARCHED SUSTAINABLE GROUNDWATER MANAGEMENT ACT PRE-PLAN AND POST-PLAN EXTRACTION FEE.	1.20	180.00
07/08/19	AND	RESEARCHED EXAMPLES OF SUSTAINABLE GROUNDWATER MANAGEMENT ACT FINANCING OPTIONS.	1.50	225.00
07/09/19	JDH	REVIEWED POWERPOINT PRESENTATION; E-MAILED SAME TO J. BECK.	1.00	270.00
07/10/19	JDH	TELEPHONE CONFERENCE WITH J. BECK REGARDING BOARD MEETING; TELEPHONE CONFERENCE WITH J. BECK, D. YUROSEK AND L. MELTON REGARDING SAME.	1.00	270.00
07/10/19	JDH	ATTENDED JULY REGULAR BOARD MEETING.	7.50	2,025.00
07/12/19	JDH	WEEKLY PMT CALL.	1.30	351.00
07/15/19	JDH	CONFERENCE CALL WITH D. YUROSEK, J. BECK, M. KLINCHUH REGARDING WATER DISTRICT ISSUE; TELEPHONE CONFERENCE WITH A. DOUD.	0.50	135.00

		Rate	Hours	Amount
AND	DOMINGUEZ, ALEX	150.00	7.80	1,170.00
JDH	HUGHES, JOSEPH	270.00	22.00	5,940.00
JVK	KOMAR, JOHN	270.00	3.50	945.00
Total Fees				**$8,055.00**

PAYMENT DUE UPON RECEIPT
PLEASE REFER TO BILL NUMBER LOCATED BENEATH STATEMENT DATE WHEN SUBMITTING PAYMENT
TO ENSURE PROPER CREDIT.
A FINANCE CHARGE OF 1 1/2% PER MONTH (18% ANNUALLY) WILL BE CHARGED ON ALL BALANCES OVER 30 DAYS.
FEDERAL I.D. NO. 95-2298220

KLEIN, DENATALE, GOLDNER, COOPER, ROSENLIEB & KIMBALL, LLP

Bill No. 22930-001-147156 **July 30, 2019** **Page 3**
Client Ref: 22930 - 001

Costs and Expenses

Date	Expenses	Amount
07/11/19	TRAVEL EXPENSES 7/10 ROUND TRIP TRAVEL TO NEW CUYAMA FOR JULY BOARD MEETING - JOSEPH D. HUGHES	75.40
Total Costs and Expenses		**$75.40**

Current Charges	**$8,130.40**
Prior Statement Balance	16,443.82
Payments/Adjustments Since Last Bill	-0.00
Pay This Amount	**$24,574.22**

Any Payments Received After July 30, 2019 Will Appear on Your Next Statement

WOODARD &CURRAN

COMMITMENT & INTEGRITY
DRIVE RESULTS

Remit to:
PO Box 55008
Boston, MA 02205-5008

T 800.426.4262
T 207.774.2112
F 207.774.6635

TD BANK
Electronic Transfer:
⑆211274450⑆ 2427662596⑈

INVOICE

Jim Beck
Executive Director
Cuyama Basin Groundwater Sustainability Agency
c/o Hallmark Group
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815

August 28, 2019
Project No: 0011078.01
Invoice No: 166794

Project 0011078.01 CUYAMA GSP

Professional Services for the period ending July 31, 2019

Phase 016 Finalize GSP Development

Professional Personnel

	Hours	Rate	Amount
Engineer 1			
Poore, Sebastien	.25	162.00	40.50
Engineer 3			
Ceyhan, Mahmut	81.00	212.00	17,172.00
Lee, Elisa	10.75	212.00	2,279.00
Graphic Artist			
Fox, Adam	11.50	118.00	1,357.00
Gustafson, Michael	4.00	118.00	472.00
National Practice Leader			
Melton, Lyndel	73.50	320.00	23,520.00
Planner 2			
De Anda, Vanessa	35.50	187.00	6,638.50
Eggleton, Charles	123.00	187.00	23,001.00
Kidson, Jennifer	60.50	187.00	11,313.50
Project Assistant			
Hughart, Desiree	34.00	110.00	3,740.00
Project Manager 2			
Van Lienden, Brian	171.50	266.00	45,619.00
Project Planner 1			
Johnson, Sally	24.00	221.00	5,304.00
Senior Project Assistant			
Daugherty, Lisa	55.50	129.00	7,159.50
Senior Project Manager			
Long, Jeanna	7.50	282.00	2,115.00
Service Line Leader			
Matson, Michael	1.00	310.00	310.00

Please include our invoice number in your remittance. Thank you.

Senior Technical Practice Leader					
Lopezcalva, Enrique		3.50	310.00	1,085.00	
Taghavi, Ali		17.00	310.00	5,270.00	
	Totals	714.00		156,396.00	
	Labor Total				**156,396.00**
Reimbursable					
Vehicle Expenses					
4/26/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		33.11	
4/26/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		62.37	
4/26/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		95.02	
5/1/2019	Eggleton, Charles	Public Meeting		55.70	
5/2/2019	Eggleton, Charles	Public Meeting		51.88	
5/2/2019	Eggleton, Charles	Public Meeting		170.73	
5/30/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		31.74	
5/31/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		43.54	
5/31/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		96.20	
6/6/2019	Taghavi, Ali	Business		201.44	
6/6/2019	Taghavi, Ali	Business		60.04	
6/27/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		78.09	
6/28/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		94.02	
6/28/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		54.74	
Travel & Lodging					
4/25/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		116.99	
4/25/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		11.93	
5/1/2019	Van Lienden, Brian	Cuyama GSP Board/Worshops		10.62	
5/1/2019	Van Lienden, Brian	Cuyama GSP Board/Worshops		106.19	
5/1/2019	Eggleton, Charles	Public Meeting		10.62	
5/1/2019	Eggleton, Charles	Public Meeting		106.19	
5/30/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		90.00	
5/30/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		9.18	
6/27/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		112.49	
6/27/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		11.47	
Meals					
4/26/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		12.74	
5/30/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		11.64	
6/27/2019	Van Lienden, Brian	Cuyama GSP SAC meeting		10.53	
	Reimbursable Total		**1.1 times**	**1,749.21**	**1,924.13**
Consultant					
Subcontractor Expense					
5/24/2019	The Catalyst Group, Inc.	Inv#409		8,684.47	
8/23/2019	The Catalyst Group, Inc.	Inv#413		3,448.75	
8/23/2019	The Catalyst Group, Inc.	Inv#420		4,576.72	
	Consultant Total		**1.1 times**	**16,709.94**	**18,380.93**
			Total this Phase		**$176,701.06**
			Total this Invoice		**$176,701.06**

	Current Fee	Previous Fee	Total
Project Summary	**176,701.06**	**1,935,017.08**	**2,111,718.14**

Approved by:

Brian Van Lienden
Project Manager
Woodard & Curran

Progress Report

Cuyama Basin Groundwater Sustainability Plan Development

Subject:	**July 2019 Progress Report**
Prepared for:	Jim Beck, Executive Director, Cuyama Basin Groundwater Sustainability Agency (CBGSA)
Prepared by:	Brian Van Lienden, Woodard & Curran
Reviewed by:	Lyndel Melton, Woodard & Curran
Date:	August 30, 2019
Project No.:	0011078.01

This progress report summarizes the work performed and project status for the period of June 29, 2019 through July 26, 2019 on the Cuyama Basin Groundwater Sustainability Plan Development project. The work associated with this invoice was performed in accordance with our Consulting Services Agreement dated December 6, 2017, and with Task Order 5, issued by the CBGSA on June 6, 2018, and Task Order 6, issued by the CBGSA on August 7, 2019. Note that Task Orders 1, 2, 3 and 4 were already 100% spent as of the beginning of this reporting period.

In addition to work performed during the reporting period, the invoice includes previously unbilled work to complete GSP development totaling $153,690.81, which has been included under Task 16.

The progress report contains the following sections:

1. Work Performed
2. Budget Status
3. Schedule Status
4. Outstanding Issues to be Coordinated

1 Work Performed

A summary of work performed on the project during the current reporting period is provided in Tables 1, 2 and 3 below. Table 1 shows work performed under Task Orders 2 and 4, which include tasks identified in the Category 2 grant from the California Department of Water Resources (DWR). Table 2 shows work performed under Task Orders 3 and 5, which includes tasks identified in the Category 1 grant from DWR. Table 3 shows work performed under Task Order 6.

Table 1: Summary of Task/Deliverables Status for Category 2 Tasks (Task Orders 2 and 4)

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 1: Initiate Work Plan for GSP and Stakeholder Engagement Strategy Development	• Task 1 is completed; no work was undertaken on this task during this reporting period	100%	• Task 1 is completed; no further work is anticipated
Task 2: Data Management System, Data Collection and Analysis, and Plan Review	• Task 2 is completed; no work was undertaken on this task during this reporting period	100%	• Task 2 is completed; no further work is anticipated
Task 3: Description of the Plan Area, Hydrogeologic Conceptual Model, and Groundwater Conditions	• Task 3 is completed; no work was undertaken on this task during this reporting period	100%	• Task 3 is completed; no further work is anticipated
Task 4: Basin Model and Water Budget	• Task 4 is completed; no work was undertaken on this task during this reporting period	100%	• Task 4 is completed; no further work is anticipated
Task 5: Establish Basin Sustainability Criteria	• Task 5 is completed; no work was undertaken on this task during this reporting period	100%	• Task 5 is completed; no further work is anticipated
Task 6. Monitoring Networks	• Task 6 is completed; no work was undertaken on this task during this reporting period	100%	• Task 6 is completed; no further work is anticipated
Task 7: Projects and Actions for Sustainability Goals	• Task 7 is completed; no work was undertaken on this task during this reporting period	100%	• Task 7 is completed; no further work is anticipated

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 8. GSP Implementation	• Task 8 is completed; no work was undertaken on this task during this reporting period	100%	• Task 8 is completed; no further work is anticipated
Task 9. GSP Development	• Task 9 is completed; no work was undertaken on this task during this reporting period	100%	• Task 9 is completed; no further work is anticipated; additional work to complete the GSP will be performed under Task 16
Task 10: Education, Outreach and Communication	• Task 10 is completed; no work was undertaken on this task during this reporting period	100%	• Task 10 is completed; no further work is anticipated; additional outreach and communication work will be performed under Tasks 17 and 18
Task 11: Project Management	• Task 11 is completed; no work was undertaken on this task during this reporting period	100%	• Task 11 is completed; no further work is anticipated. Further project management activities will be covered in Tasks 15 and 16.

Table 2: Summary of Task/Deliverables Status for Category 1 Tasks (Task Orders 3 and 5)

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 12: Groundwater Monitoring Well Network Expansion	• No work was performed on Task 12 during this period.	62%	• Work will commence to perform the field work required to install the data sensors
Task 13: Evapotranspiration Evaluation for Cuyama Basin Region	• No work was performed on Task 13 during this period.	100%	• Task 13 is completed; no further work is anticipated
Task 14: Surface Water Monitoring Program	• No work was performed on Task 14 during this period.	41%	• Work will continue to install the surface flow gages

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 15: Category 1 Project Management	• Ongoing project management and grant administration activities	91%	• Ongoing project management and grant administration activities

Table 3: Summary of Task/Deliverables Status for Task Order 6

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 16: Finalize GSP Development	• Development of Final Draft GSP document and subsequent GSP updates • Prepare for and participate in SAC/Board meetings • Grant administration	90%	• Update GSP document in response to Board comments • Ongoing project management and grant administration activities
Task 17: Stakeholder & Board Engagement	• No work was undertaken on this task during this reporting period	0%	• Prepare for and attend for upcoming August 7 Board meeting
Task 18: Outreach Support	• Task 3 is completed; no work was undertaken on this task during this reporting period	0%	• Ongoing CBGSA outreach support
Task 19: Support for DWR Technical Support Services	• Task 4 is completed; no work was undertaken on this task during this reporting period	0%	• Participate in additional ad-hoc committee calls and prepare required documents for DWR
Task 20: Prepare SGM Planning Grant Application	• Task 5 is completed; no work was undertaken on this task during this reporting period	0%	• No work is anticipated until September or later
Task 21: Development of a CBGSA Fee Structure	• Task 5 is completed; no work was undertaken on this task during this reporting period	0%	• No work is anticipated until September or later

2 Budget Status

Table 4 shows the percent spent for each task under Task Order 1. 100% of the available Task Order 1 budget has been expended ($321,135.00 out of $321,135).

Table 4: Budget Status for Task Order 1

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
1	$ 35,768.00	$ 35,755.53	$ -	$ 35,755.53	$ 12.47	100%
2	$ 61,413.00	$ 61,413.00	$ -	$ 61,413.00	$ -	100%
3	$ 45,766.00	$ 45,766.00	$ -	$ 45,766.00	$ -	100%
4	$ 110,724.00	$ 110,724.00	$ -	$ 110,724.00	$ -	100%
5	$ -	$ -	$ -	$ -	$ -	n/a
6	$ -	$ -	$ -	$ -	$ -	n/a
7	$ 12,120.00	$ 12,120.00	$ -	$ 12,120.00	$ -	100%
8	$ -	$ -	$ -	$ -	$ -	n/a
9	$ -	$ -	$ -	$ -	$ -	n/a
10	$ 45,420.00	$ 45,432.47	$ -	$ 45,432.47	$ (12.47)	100%
11	$ 9,924.00	$ 9,924.00	$ -	$ 9,924.00	$ -	100%
Total	**$ 321,135.00**	**$ 321,135.00**	$ -	**$ 321,135.00**	$ -	**100%**

Table 5 shows the percent spent for each task under Task Order 2. 100% of the available Task Order 2 budget has been expended ($399,469.00 out of $399,469).

Table 5: Budget Status for Task Order 2

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
1	$ -	$ -	$ -	$ -	$ -	n/a
2	$ 48,457.00	$ 48,458.00	$ -	$ 48,458.00	$ (1.00)	100%
3	$ 24,182.00	$ 24,182.00	$ -	$ 24,182.00	$ -	100%
4	$ 103,880.00	$ 103,880.00	$ -	$ 103,880.00	$ -	100%
5	$ 60,676.00	$ 60,676.00	$ -	$ 60,676.00	$ -	100%
6	$ 65,256.00	$ 65,255.00	$ -	$ 65,255.00	$ 1.00	100%
7	$ 36,402.00	$ 36,402.00	$ -	$ 36,402.00	$ -	100%
8	$ -	$ -	$ -	$ -	$ -	n/a
9	$ -	$ -	$ -	$ -	$ -	n/a
10	$ 45,420.00	$ 45,420.00	$ -	$ 45,420.00	$ -	100%
11	$ 15,196.00	$ 15,196.00	$ -	$ 15,196.00	$ -	100%
Total	**$ 399,469.00**	**$ 399,469.00**	**$ -**	**$ 399,469.00**	**$ -**	**100%**

Table 6 shows the percent spent for each task under Task Order 3. 100% of the available Task Order 3 budget has been expended ($188,238.00 out of $188,238).

Table 6: Budget Status for Task Order 3

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
12	$ 53,244.00	$ 53,244.00	$ -	$ 53,244.00	$ -	100%
13	$ 69,706.00	$ 69,706.00	$ -	$ 69,706.00	$ -	100%
14	$ 53,342.00	$ 53,342.00	$ -	$ 53,342.00	$ -	100%
15	$ 11,946.00	$ 11,946.00	$ -	$ 11,946.00	$ -	100%
Total	**$ 188,238.00**	**$ 188,238.00**	$ -	**$ 188,238.00**	**$ -**	**100%**

Table 7 shows the percent spent for each task under Task Order 4 as of June 28, 2019. 100% of the available Task Order 4 budget has been expended ($764,394.14 out of $764,396).

Table 7: Budget Status for Task Order 4

Task	Total Budget	Spent Previously	Amount Invoiced This Month	Total Spent to Date	Budget Remaining	% Spent to Date
1	$ -	$ -	$ -	$ -	$ -	n/a
2	$ 24,780.00	$ 24,793.50	$ -	$ 24,793.50	$ (13.50)	100%
3	$ 26,912.00	$ 26,894.00	$ -	$ 26,894.00	$ 18.00	100%
4	$ 280,196.00	$ 280,190.26	$ -	$ 280,190.26	$ 5.74	100%
5	$ 47,698.00	$ 47,641.88	$ -	$ 47,641.88	$ 56.12	100%
6	$ -	$ -	$ -	$ -	$ -	n/a
7	$ 117,010.00	$ 117,009.20	$ -	$ 117,009.20	$ 0.80	100%
8	$ 69,780.00	$ 69,831.25	$ -	$ 69,831.25	$ (51.25)	100%
9	$ 91,132.00	$ 91,567.49	$ -	$ 91,567.49	$ (435.49)	100%
10	$ 70,236.00	$ 69,766.10	$ -	$ 69,766.10	$ 469.90	100%
11	$ 36,652.00	$ 36,700.46	$ -	$ 36,700.46	$ (48.46)	100%
Total	**$ 764,396.00**	**$ 764,394.14**	$ -	**$ 764,394.14**	**$ 1.86**	**100%**

Table 8 shows the percent spent for each task under Task Order 5 as of July 26, 2019. 57% of the available Task Order 5 budget has been expended ($259,278.95 out of $459,886).

Table 8: Budget Status for Task Order 5

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
12	$ 196,208.00	$ 126,731.51	$ -	$ 126,731.51	$ 69,476.49	65%
13	$ 24,950.00	$ 24,933.01	$ -	$ 24,933.01	$ 16.99	100%
14	$ 204,906.00	$ 80,315.88	$ -	$ 80,315.88	$ 124,590.12	39%
15	$ 33,822.00	$ 29,800.55	$ -	$ 29,800.55	$ 4,021.45	88%
Total	**$ 459,886.00**	**$ 259,278.95**	$ -	**$ 261,780.95**	**$ 198,105.05**	**57%**

Table 9 shows the percent spent for each task under Task Order 6 as of July 26, 2019. 49% of the available Task Order 6 budget has been expended ($176,701.06 out of $357,405).

Table 9: Budget Status for Task Order 5

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
16	$ 195,658.00	$ -	$ 176,701.06	$ 176,701.06	$ 18,956.94	90%
17	$ 57,406.00	$ -	$ -	$ -	$ 57,406.00	0%
18	$ 12,901.00	$ -	$ -	$ -	$ 12,901.00	0%
19	$ 18,848.00	$ -	$ -	$ -	$ 18,848.00	0%
20	$ 40,032.00	$ -	$ -	$ -	$ 40,032.00	0%
21	$ 32,560.00	$ -	$ -	$ -	$ 32,560.00	0%
Total	**$ 357,405.00**	$ -	**$ 176,701.06**	**$ 176,701.06**	**$ 180,703.94**	**49%**

3 Schedule Status

The project is on schedule. Work authorized under Task Orders 1, 2, 3 and 4 are complete.

4 Outstanding Issues to be Coordinated

None

HALLMARK GROUP Capital Program Management

INVOICE

1901 Royal Oaks Drive
Suite 200
Sacramento, CA 95815

916 923.1500
hgcpm.com

To: **Cuyama Basin GSA**
c/o Jim Beck
4900 California Avenue, Ste B
Bakersfield, CA 93309

Please Remit To: **Hallmark Group**
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815
P: (916) 923-1500

Invoice No.: 2019-CBGSA-08
Task Orders: CB-HG-003/CB-HG-004
Agreement No. 201709-CB-001
Date: September 10, 2019

For professional services rendered for the month of August 2019

Task Order	Sub Task	Task Description	Billing Classification	Hours	Rate	Amount
CB-HG-003	1	GSA Board of Directors and Advisory Committee Meetings	Executive Director	17.25	$ 250.00	$ 4,312.50
			Project Coordinator/Admin	27.75	$ 100.00	$ 2,775.00
					Total Sub Task 1 Labor	**$ 7,087.50**
CB-HG-003	2	Consultant Management and GSP Development	Executive Director	8.75	$ 250.00	$ 2,187.50
			Project Coordinator/Admin	20.00	$ 100.00	$ 2,000.00
					Total Sub Task 2 Labor	**$ 4,187.50**
CB-HG-003	3	Financial Information Coordination	Executive Director	0.00	$ 250.00	$ -
			Project Controls	10.00	$ 200.00	$ 2,000.00
			Project Coordinator/Admin	8.25	$ 100.00	$ 825.00
					Total Sub Task 3 Labor	**$ 2,825.00**
CB-HG-003	4	CBGSA Outreach	Executive Director	0.00	$ 250.00	$ -
			Project Coordinator/Admin	3.00	$ 100.00	$ 300.00
					Total Sub Task 4 Labor	**$ 300.00**
					Total Task CB-HG-003 Labor	**$ 14,400.00**
CB-HG-004		Groundwater Extraction Fee Assessment	Executive Director	3.75	$ 250.00	$ 937.50
			Project Coordinator/Admin	8.00	$ 100.00	$ 800.00
			E.D. In-Kind Contribution	0.00	$ (250.00)	$ -
					Total Task CB-HG-004 Labor	**$ 1,737.50**
					Total Labor	**$ 16,137.50**
			Travel	8/7/2019		$ 67.58
			Conference Calls			$ 299.49
			Printing Costs			$ 27.50
					SubTotal Travel and Other Direct Costs	**$ 394.57**
			ODC Mark Up		5%	$ 16.35
					Total Travel and Other Direct Costs	**$ 410.92**
					TOTAL AMOUNT DUE FOR THIS INVOICE	**$ 16,548.42**

Task Order	Original Totals	Amendment(s)	Total Committed	Previously Billed	Current Billing	Remaining Balance
CB-HG-003	$ 212,810.00	$ -	$ 212,810.00	$ 122,037.50	$ 14,400.00	$ 76,372.50
CB-HG-004	$ 22,500.00	$ -	$ 22,500.00	$ -	$ 1,737.50	$ 20,762.50
Travel and ODC	$ -	$ -	$ -	$ 4,110.74	$ 410.92	$ (4,521.66)
Total	$ 235,310.00	$ -	$ 235,310.00	$ 126,148.24	$ 16,548.42	$ 92,613.34

HALLMARK GROUP Capital Program Management

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

PROGRESS REPORT FOR TASK ORDER CB-HG-003 & CB-HG-004

Client Name:	Cuyama Basin Groundwater Sustainability Agency	**Agreement Number:**	201709-CB-001
Company Name:	HGCPM, Inc. DBA The Hallmark Group	**Address:**	1901 Royal Oaks Drive, Suite 200 Sacramento, CA 95815
Task Order Number:	CB-HG-003 & CB-HG-004	**Report Period:**	August 1-31, 2019
Progress Report Number:	8	**Project Manager:**	Jim Beck
Invoice Number:	2019-CBGSA-08	**Invoice Date:**	September 10, 2019

SUMMARY OF WORK PERFORMED

Task Order 3

Task 1: Board and Standing Advisory Committee Meeting Facilitation

- Prepared for and attended monthly Cuyama Basin Groundwater Sustainability Agency (CBGSA) Board meeting.
- Drafted, prepared, and distributed documents for the CBGSA Board of Directors meeting packets.
- Drafted CBGSA Board minutes.
- Drafted, reviewed, and discussed Board agenda.
- Developed Task Order summary spreadsheet.
- Reviewed and discussed email regarding RMC proposal with Woodard & Curran (W&C).
- Drafted notice of intent to adopt a Groundwater Sustainability Plan (GSP) and distributed to Kern County, San Luis Obispo County, Santa Barbara County, and Ventura County.

Task 2: GSP Consultant Management and GSP Development

- Prepared for, met with, and facilitated CBGSA Program Management Team (PMT) on a weekly basis to discuss GSP section progress and outreach.
- Drafted, prepared, and distributed documents to discuss the Cuyama Basin Water District (CBWD) management agreement at the CBGSA ad hoc meeting on August 23, 2019.
- Coordinated, prepared for, and attended teleconference ad hoc meeting on August 23, 2019 to discuss the CBWD management agreement.
- Revised and distributed the term sheet for the CBWD management agreement and discussed with A. Doud and M. Klinchuch.
- Discussed economic analysis with P. Chounet.
- Discussed GSP language changes regarding artificial transfers and exchanges of water with J. Wooster.

- Discussed the California Environmental Quality Act (CEQA) requirement for field work with the California Department of Water Resources' (DWR) A. Regmi.

Task 3: Financial Management

- Audit correspondence and document preparation.
- Distributed economic analysis scope.
- Developed Hallmark Group's Task Order No. 4.
- Preformed analysis and developed Earned Value Management report for W&C's Task Order No. 6 and Hallmark Group's Task Order No. 4.
- Reviewed DWR's invoice payment and discussed payment strategy.
- Researched and discussed invoice variance with A. Regmi and J. Kidson.
- Submitted the Prop 1 SGWP Grant Progress Report No. 2 and backup documentation.
- General accounting and preparation of monthly financial statements.
- Billing and administration.

Task 4: Stakeholder Outreach Facilitation

- Reviewed and distributed public hearing notices to Board, Standing Advisory Committee (SAC), and stakeholders.
- Coordinated the update of the Cuyama Basin Groundwater Sustainability Agency (CBGSA) website with Board and Standing Advisory Committee minutes, agendas, GSP chapters, and GSP presentations.
- Updated CBGSA public stakeholder contact list.

Task Order 4

Task 1: Development of Groundwater Extraction Fee

- Developed and reviewed groundwater extraction fee schedule and graphic.
- Drafted, prepared, and distributed documents to discuss the groundwater extraction fee at the CBGSA ad hoc meeting on August 22, 2019.
- Coordinated, prepared for, and attended teleconference ad hoc meeting on August 22, 2019 to discuss the groundwater extraction fee.

DELIVERABLES AND COMPLETED TASKS

- Developed CBGSA Board agenda for August 7, 2019.
- Attended CBGSA Board meeting on August 7, 2019.
- Drafted meeting minutes for CBGSA Board meeting on August 7, 2019.
- Prepared for, met with, and facilitate CBGSA program management team on a weekly basis.

PLANNED OBJECTIVES FOR NEXT REPORTING PERIOD

- Prepare for and attend CBGSA Board meeting on November 6, 2019.

SIGNIFICANT ISSUES OR CHALLENGES (IF ANY) AND POTENTIAL RESOLUTIONS

- N/A

GAN CONFERENCING
Bringing the world together

Invoice Date: 9/2/2019
Total: $709.95
Statement# 41169 Customer# 3122729

HGCPM, Inc. - Formerly Advance Education
1901 Royal Oaks Dr
STE 200
Sacramento, CA 95815 -4235

Remit to:
Great America Networks Conferencing
1441 Branding Ave
Suite 200
Downers Grove, IL 60515 0000

CALL US
1-877-438-4261

Summary

Balance Information	
Previous Balance	775.20
Payments Received - Thank you!	(775.20)
Balance Forward	
New Charges	
New Usage Charges	570.70
Recurring Charges	0.00
Taxes and Surcharges	139.25
Total New Charges	709.95
Total Amount Due	709.95

Payments

Description	Date	Amount
Payment Received, Thank you!	08/16/19	(775.20)
Subtotal		($775.20)

Taxes and Surcharges

Federal Universal Service Fund	139.25
Subtotal	$139.25

Management Reports

Usage by Category

Description	Calls	Minutes	Charge
Usage - Conference Calling	205	11,414.00	570.70
	205.00	11,414.00	570.70

Long Distance By Line

TN	Calls	Mins	Charge
	205	11,414.00	570.70
	205	11,414.00	570.70

Toll-free Usage

Cuyama BDSAC Conference ID: 4916656

#	Date	Time	Other	Location	Mins	Amt
1	08/01/19	12:00P	6613340233	Host	42.00	2.10
2	08/01/19	12:01P	6613302610	Host	29.00	1.45
3	08/01/19	12:01P	6613337091	Host	41.00	2.05
4	08/01/19	12:30P	6613302610	Host	12.00	.60
Subtotal			124.00			6.20

Cuyama BDSAC Conference ID: 4918031

#	Date	Time	Other	Location	Mins	Amt
1	08/02/19	12:58P	6613337091	Host	58.00	2.90
2	08/02/19	12:59P	6613302610	Host	57.00	2.85
3	08/02/19	01:01P	6613196477	Host	55.00	2.75
Subtotal			170.00			8.50

Cuyama BDSAC Conference ID: 4922751

#	Date	Time	Other	Location	Mins	Amt
1	08/07/19	05:56P	6617662369	Host	162.00	8.10
2	08/07/19	05:58P	6507590535	Participant	161.00	8.05
3	08/07/19	06:01P	8056377711	Host	155.00	7.75
4	08/07/19	06:01P	8057815275	Host	1.00	.05
5	08/07/19	06:01P	8184814388	Participant	157.00	7.85
6	08/07/19	06:01P	8318182451	Participant	158.00	7.90
7	08/07/19	06:01P	9256274112	Host	149.00	7.45

8	08/07/19	06:02P	4155242290	Host	150.00	7.50
9	08/07/19	06:02P	8057815275	Host	156.00	7.80
10	08/07/19	06:52P	6614734022	Participant	31.00	1.55
11	08/07/19	07:53P	4157938420	Host	45.00	2.25
Subtotal			1,325.00			66.25

Cuyama BDSAC Conference ID: 4937967

#	Date	Time	Other	Location	Mins	Amt
1	08/21/19	04:59P	6613951000	Host	28.00	1.40
2	08/21/19	05:00P	6614773385	Host	26.00	1.30
3	08/21/19	05:03P	6613337091	Host	24.00	1.20
Subtotal			78.00			3.90

Cuyama BDSAC Conference ID: 4938893

#	Date	Time	Other	Location	Mins	Amt
1	08/22/19	11:55A	6193190245	Host	96.00	4.80
2	08/22/19	11:59A	6613337091	Host	92.00	4.60
3	08/22/19	11:59A	6613951000	Host	92.00	4.60
4	08/22/19	11:59A	6614773385	Host	92.00	4.60
5	08/22/19	11:59A	6618455256	Host	92.00	4.60
6	08/22/19	12:00P	8056160470	Host	91.00	4.55
7	08/22/19	12:00P	8056802226	Host	92.00	4.60
8	08/22/19	12:06P	8318094568	Host	86.00	4.30
Subtotal			733.00			36.65

Cuyama BDSAC Conference ID: 4939531

#	Date	Time	Other	Location	Mins	Amt
1	08/22/19	04:59P	6613337091	Host	35.00	1.75
2	08/22/19	04:59P	6614773385	Host	35.00	1.75
3	08/22/19	05:02P	6613951000	Host	33.00	1.65
Subtotal			103.00			5.15

Cuyama BDSAC Conference ID: 4940816

#	Date	Time	Other	Location	Mins	Amt
1	08/23/19	05:28P	6613337091	Host	72.00	3.60
2	08/23/19	05:29P	6613638463	Host	71.00	3.55
3	08/23/19	05:29P	6613951000	Host	71.00	3.55
4	08/23/19	05:29P	8056377711	Host	72.00	3.60
5	08/23/19	05:30P	6613302610	Host	71.00	3.55
6	08/23/19	05:30P	6614773385	Host	71.00	3.55
7	08/23/19	05:30P	8053193866	Host	71.00	3.55
8	08/23/19	05:47P	8053314650	Host	12.00	.60
9	08/23/19	05:59P	8053314650	Host	1.00	.05
10	08/23/19	06:01P	8053314650	Host	14.00	.70
11	08/23/19	06:15P	8053314650	Host	25.00	1.25
Subtotal			551.00			27.55

Cuyama GSA Conference ID: 4917932

#	Date	Time	Other	Location	Mins	Amt
1	08/02/19	11:58A	6613337091	Host	27.00	1.35
2	08/02/19	12:00P	6613340233	Host	59.00	2.95
3	08/02/19	12:00P	6614773385	Host	2.00	.10
4	08/02/19	12:01P	6614773385	Host	58.00	2.90
5	08/02/19	12:01P	9169998777	Host	58.00	2.90
6	08/02/19	12:02P	6613196477	Host	57.00	2.85
7	08/02/19	12:04P	4155242290	Host	56.00	2.80
8	08/02/19	12:25P	6613337091	Host	29.00	1.45
9	08/02/19	12:55P	6613337091	Host	3.00	.15
Subtotal			349.00			17.45

Cuyama GSA Conference ID: 4924940

#	Date	Time	Other	Location	Mins	Amt
1	08/09/19	11:59A	4155242290	Host	55.00	2.75
2	08/09/19	11:59A	6613951000	Host	82.00	4.10
3	08/09/19	11:59A	6614773385	Host	82.00	4.10
4	08/09/19	12:00P	4157938420	Host	77.00	3.85
5	08/09/19	12:01P	6613337091	Host	80.00	4.00
6	08/09/19	12:01P	9169998777	Host	80.00	4.00
7	08/09/19	12:11P	9258581340	Host	70.00	3.50
8	08/09/19	12:53P	4155242290	Host	28.00	1.40
Subtotal			554.00			27.70

Cuyama GSA Conference ID: 4941866

#	Date	Time	Other	Location	Mins	Amt
1	08/26/19	12:28P	4157938420	Host	99.00	4.95
2	08/26/19	12:29P	6613337091	Host	98.00	4.90
3	08/26/19	12:29P	6614773385	Host	99.00	4.95
4	08/26/19	12:31P	6613951000	Host	96.00	4.80
5	08/26/19	12:32P	9256274112	Host	95.00	4.75
6	08/26/19	12:34P	9169998777	Host	94.00	4.70
Subtotal			581.00			29.05

Cuyama GSA Conference ID: 4947988

#	Date	Time	Other	Location	Mins	Amt
1	08/30/19	11:58A	4157938420	Host	51.00	2.55
2	08/30/19	11:59A	6613337091	Host	50.00	2.50
3	08/30/19	11:59A	6614773385	Host	50.00	2.50
4	08/30/19	12:00P	9169998777	Host	49.00	2.45
5	08/30/19	12:02P	6613951000	Host	47.00	2.35
Subtotal			247.00			12.35

A	Cuyama Charges:		
		1-Aug	$6.20
		2-Aug	$8.50
		2-Aug	$17.45
		7-Aug	$66.25
		9-Aug	$27.70
		21-Aug	$3.90
		22-Aug	$36.65
		22-Aug	$5.15
		23-Aug	$27.55
		26-Aug	$29.05
		30-Aug	$12.35
B	Subtotal		$240.75
C	Total Conf Line Charge		$570.70
D	Total Taxes and Surcharges		$139.25
E	Tax and Surcharges Rate (D/C)		24.4%
F	Tax and Surcharges Incurred by Cuyama (B*E)		$58.74
G	Total Cuyama Charge (B+F)		**$299.49**

CUYAMA PRINTING COSTS

Board- 8/7/19

Document	B&W, or Color	Pages	Rate	Cost
Agenda (Board)	B&W	30	$ 0.10	$ 3.00
Agenda (Public)	B&W	40	$ 0.10	$ 4.00
Sign-in Sheet	B&W	1	$ 0.10	$ 0.10
Board Packets	B&W	107	$ 0.10	$ 10.70
			Total Cost	$ 17.80

CUYAMA LANDOWNER PRINTING COSTS

August

Document	B&W, or Color	Pages	Rate	Cost
8/7 Board Packet	B&W	97	$ 0.10	$ 9.70
			Total Cost	$ 9.70

Total Cost	$ 27.50

Project and Person Summary with Expense Detail

Date Range: 8/1/2019 - 8/31/2019

Client / *Project*	*Person* / *Expense Type*	*Date*	*Description*	*Mileage*	*Amount*
Cuyama Basin Groundwater Sustainability Agency					
1708-CBGSA ED CBGSA Executive Director Services					
	Taylor Blakslee				***$95.08***
	Mileage			*124.00*	*$67.58*
		8/7/2019	Mileage to Cuyama from Bakersfield (RT) - Board	124.00	$67.58
	Supplies				*$27.50*
		8/31/2019	Printing costs for Board packets, etc.		$27.50
				CBGSA Executive Director Services Subtotal	**$95.08**
				Cuyama Basin Groundwater Sustainability Agency Subtotal	**$95.08**
				Grand Total	***$95.08***

KLEIN, DENATALE, GOLDNER
COOPER, ROSENLIEB & KIMBALL, LLP

4550 CALIFORNIA AVENUE
SECOND FLOOR
BAKERSFIELD, CA 93309

MAILING ADDRESS:
P.O. BOX 11172
BAKERSFIELD, CA 93389-1172
(661) 395-1000
FAX (661) 326-0418
E-MAIL accounting@kleinlaw.com

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY
C/O HALLMARK GROUP
******EMAIL INVOICES******

August 30, 2019
Bill No. 22930-001-148642
JDH

Statement for Period through August 19, 2019

Re: 22930 - CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY
001 GENERAL BUSINESS

Date		Services	Hours	Amount
07/20/19	JDH	REVIEWED AND REVISED DRAFT HEARING NOTICES; E-MAILED M. CURIE REGARDING SAME.	1.00	270.00
07/26/19	JDH	BEGAN PREPARATION OF MOU FOR DELEGATION OF MANAGEMENT AUTHORITY; TELEPHONE CONFERENCE WITH A. DOUD REGARDING SAME.	1.50	405.00
07/29/19	JDH	WEEKLY PMT CALL.	0.60	162.00
07/30/19	JDH	DRAFTED DELEGATION PRINCIPLES FOR WATER DISTRICT IMPLEMENTATION OF GSP.	1.50	405.00
08/01/19	JDH	TELEPHONE CONFERENCES WITH A. DOUD; REVIEWED DRAFT AGREEMENT WITH WATER DISTRICT; TELEPHONE CONFERENCE WITH J. BECK; E-MAILED J. BECK REGARDING DRAFT AGREEMENT.	1.40	378.00
08/02/19	JDH	WEEKLY PMT CALL.	1.00	270.00
08/02/19	JDH	TELEPHONE CONFERENCE WITH D. YUROSEK AND J. BECK.	1.00	270.00
08/02/19	JDH	DRAFTED STAFF MEMORANDUM REGARDING DELEGATION PRINCIPLES.	0.70	189.00
08/02/19	JDH	TELEPHONE CONFERENCES WITH T. BLAKSLEE.	0.40	108.00
08/05/19	JDH	TELEPHONE CONFERENCE WITH A. DOUD REGARDING REVISIONS TO DRAFT PRINCIPLES; REVIEWED REDLINED DRAFT AND E-MAILED SAME TO J. BECK AND T. BLAKSLEE.	1.30	351.00
08/07/19	JDH	ATTENDED AUGUST REGULAR BOARD MEETING.	4.70	1,269.00
08/08/19	JDH	TELEPHONE CONFERENCE WITH A. DOUD REGARDING BOARD MEETING.	0.20	54.00
08/09/19	JDH	WEEKLY PMT CALL.	1.40	378.00

KLEIN, DENATALE, GOLDNER, COOPER, ROSENLIEB & KIMBALL, LLP

Bill No. 22930-001-148642 **August 30, 2019** **Page 2**
Client Ref: 22930 - 001

		Rate	Hours	Amount
JDH	HUGHES, JOSEPH	270.00	16.70	4,509.00
Total Fees				**$4,509.00**

Costs and Expenses

Date	Expenses	Amount
08/07/19	TRAVEL EXPENSES 8/7 ROUND TRIP TRAVEL TO NEW CUYAMA FOR AUGUST BOARD MEETING - JOSEPH D. HUGHES	75.40
Total Costs and Expenses		**$75.40**

Current Charges	**$4,584.40**
Prior Statement Balance	24,574.22
Payments/Adjustments Since Last Bill	-16,443.82
Pay This Amount	**$12,714.80**

Any Payments Received After August 30, 2019 Will Appear on Your Next Statement

WOODARD &CURRAN

COMMITMENT & INTEGRITY
DRIVE RESULTS

Remit to:
PO Box 55008
Boston, MA 02205-5008

T 800.426.4262
T 207.774.2112
F 207.774.6635

TD BANK
Electronic Transfer:
⑆211274450⑆ 2427662596⑈

INVOICE

Jim Beck
Executive Director
Cuyama Basin Groundwater Sustainability Agency
c/o Hallmark Group
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815

October 1, 2019
Project No: 0011078.01
Invoice No: 167930

Project 0011078.01 CUYAMA GSP

Professional Services for the period ending August 30, 2019

Phase 012 GW Monitoring Well Network Expansion (Cat 1 – Task 1)

Consultant

Subcontractor Expense

8/23/2019	GSI Water Solutions DBA Groundwater Solutions, Inc.	Inv#0747.001-12		486.00	
8/23/2019	GSI Water Solutions DBA Groundwater Solutions, Inc.	Inv#0747-002-1		1,458.50	
	Consultant Total		**1.1 times**	**1,944.50**	**2,138.95**
			Total this Phase		**$2,138.95**

Phase 016 Finalize GSP Development

Professional Personnel

	Hours	**Rate**	**Amount**	
Engineer 3				
Lee, Elisa	.25	212.00	53.00	
National Practice Leader				
Melton, Lyndel	2.50	320.00	800.00	
Planner 2				
Kidson, Jennifer	1.00	187.00	187.00	
Project Assistant				
Hughart, Desiree	4.00	110.00	440.00	
Project Manager 2				
Van Lienden, Brian	4.00	266.00	1,064.00	
Totals	11.75		2,544.00	
Labor Total				**2,544.00**

Consultant

Subcontractor Expense

8/23/2019	Davids Engineering, Inc.	Inv#1174.02-3294		2,970.25	
8/23/2019	Davids Engineering, Inc.	Inv#1174.02-3346		1,728.00	
8/23/2019	Davids Engineering, Inc.	Inv#1174.02-3423		191.50	
	Consultant Total		**1.1 times**	**4,889.75**	**5,378.73**
			Total this Phase		**$7,922.73**

Please include our invoice number in your remittance. Thank you.

Project	0011078.01	CUYAMA GSP	Invoice	167930

Phase 017 Stakeholder/Board Engagement

Professional Personnel

	Hours	Rate	Amount	
National Practice Leader				
Melton, Lyndel	4.50	320.00	1,440.00	
Project Manager 2				
Van Lienden, Brian	10.00	266.00	2,660.00	
Totals	14.50		4,100.00	
Labor Total				**4,100.00**
			Total this Phase	**$4,100.00**

Phase 018 Outreach

Professional Personnel

	Hours	Rate	Amount	
Graphic Artist				
Fox, Adam	1.75	118.00	206.50	
Gustafson, Michael	1.00	118.00	118.00	
Totals	2.75		324.50	
Labor Total				**324.50**

Consultant

Subcontractor Expense			2,372.89	
Consultant Total		**1.1 times**	**2,372.89**	**2,610.18**
			Total this Phase	**$2,934.68**

Phase 019 Support for DWR Technical Support Services

Professional Personnel

	Hours	Rate	Amount	
Project Manager 2				
Van Lienden, Brian	3.00	266.00	798.00	
Totals	3.00		798.00	
Labor Total				**798.00**
			Total this Phase	**$798.00**

Phase 020 Preparation of SGM Grant Program Planning Grant Application

Professional Personnel

	Hours	Rate	Amount	
Project Manager 2				
Van Lienden, Brian	2.00	266.00	532.00	
Totals	2.00		532.00	
Labor Total				**532.00**
			Total this Phase	**$532.00**
			Total this Invoice	**$18,426.36**

Project	0011078.01	CUYAMA GSP	Invoice	167930

Outstanding Invoices

Number	Date	Balance
166794	8/28/2019	176,701.06
Total		**176,701.06**

	Current Fee	Previous Fee	Total
Project Summary	**18,426.36**	**2,111,718.14**	**2,130,144.50**

Approved by: _____

Brian Van Lienden
Project Manager
Woodard & Curran

Progress Report

Cuyama Basin Groundwater Sustainability Plan Development

Subject:	**August 2019 Progress Report**
Prepared for:	Jim Beck, Executive Director, Cuyama Basin Groundwater Sustainability Agency (CBGSA)
Prepared by:	Brian Van Lienden, Woodard & Curran
Reviewed by:	Lyndel Melton, Woodard & Curran
Date:	October 2, 2019
Project No.:	0011078.01

This progress report summarizes the work performed and project status for the period of July 27, 2019 through August 30, 2019 on the Cuyama Basin Groundwater Sustainability Plan Development project. The work associated with this invoice was performed in accordance with our Consulting Services Agreement dated December 6, 2017, and with Task Order 5, issued by the CBGSA on June 6, 2018, and Task Order 6, issued by the CBGSA on August 7, 2019. Note that Task Orders 1, 2, 3 and 4 were already 100% spent as of the beginning of this reporting period.

The progress report contains the following sections:

1. Work Performed
2. Budget Status
3. Schedule Status
4. Outstanding Issues to be Coordinated

1 Work Performed

A summary of work performed on the project during the current reporting period is provided in Tables 1, 2 and 3 below. Table 1 shows work performed under Task Orders 2 and 4, which include tasks identified in the Category 2 grant from the California Department of Water Resources (DWR). Table 2 shows work performed under Task Orders 3 and 5, which includes tasks identified in the Category 1 grant from DWR. Table 3 shows work performed under Task Order 6.

Table 1: Summary of Task/Deliverables Status for Category 2 Tasks (Task Orders 2 and 4)

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 1: Initiate Work Plan for GSP and Stakeholder Engagement Strategy Development	• Task 1 is completed; no work was undertaken on this task during this reporting period	100%	• Task 1 is completed; no further work is anticipated
Task 2: Data Management System, Data Collection and Analysis, and Plan Review	• Task 2 is completed; no work was undertaken on this task during this reporting period	100%	• Task 2 is completed; no further work is anticipated
Task 3: Description of the Plan Area, Hydrogeologic Conceptual Model, and Groundwater Conditions	• Task 3 is completed; no work was undertaken on this task during this reporting period	100%	• Task 3 is completed; no further work is anticipated
Task 4: Basin Model and Water Budget	• Task 4 is completed; no work was undertaken on this task during this reporting period	100%	• Task 4 is completed; no further work is anticipated
Task 5: Establish Basin Sustainability Criteria	• Task 5 is completed; no work was undertaken on this task during this reporting period	100%	• Task 5 is completed; no further work is anticipated
Task 6. Monitoring Networks	• Task 6 is completed; no work was undertaken on this task during this reporting period	100%	• Task 6 is completed; no further work is anticipated
Task 7: Projects and Actions for Sustainability Goals	• Task 7 is completed; no work was undertaken on this task during this reporting period	100%	• Task 7 is completed; no further work is anticipated

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 8. GSP Implementation	• Task 8 is completed; no work was undertaken on this task during this reporting period	100%	• Task 8 is completed; no further work is anticipated
Task 9. GSP Development	• Task 9 is completed; no work was undertaken on this task during this reporting period	100%	• Task 9 is completed; no further work is anticipated; additional work to complete the GSP will be performed under Task 16
Task 10: Education, Outreach and Communication	• Task 10 is completed; no work was undertaken on this task during this reporting period	100%	• Task 10 is completed; no further work is anticipated; additional outreach and communication work will be performed under Tasks 17 and 18
Task 11: Project Management	• Task 11 is completed; no work was undertaken on this task during this reporting period	100%	• Task 11 is completed; no further work is anticipated. Further project management activities will be covered in Tasks 15 and 16.

Table 2: Summary of Task/Deliverables Status for Category 1 Tasks (Task Orders 3 and 5)

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 12: Groundwater Monitoring Well Network Expansion	• The draft plan for installing groundwater data sensors as required by the DWR grant was updated	63%	• Work will commence to perform the field work required to install the data sensors
Task 13: Evapotranspiration Evaluation for Cuyama Basin Region	• No work was performed on Task 13 during this period.	100%	• Task 13 is completed; no further work is anticipated
Task 14: Surface Water Monitoring Program	• No work was performed on Task 14 during this period.	41%	• Work will continue to install the surface flow gages

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 15: Category 1 Project Management	• Ongoing project management and grant administration activities	91%	• Ongoing project management and grant administration activities

Table 3: Summary of Task/Deliverables Status for Task Order 6

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 16: Finalize GSP Development	• Update draft GSP document in response to Board comments • Ongoing project coordination activities • Grant administration activities	90%	• Update GSP document in response to Board comments • Ongoing project coordination and grant administration activities
Task 17: Stakeholder & Board Engagement	• Prepare materials for and attend upcoming August 7 Board meeting	0%	• Support for upcoming SAC and Board meetings
Task 18: Outreach Support	• Ongoing stakeholder outreach activities related to GSP review and development	0%	• Ongoing CBGSA outreach support
Task 19: Support for DWR Technical Support Services	• Calls and discussion related to CEQA and permitting requirements for TSS activities	0%	• Participate in additional ad-hoc committee calls and prepare required documents for DWR
Task 20: Prepare SGM Planning Grant Application	• Develop proposed activities for grant proposal	0%	• Develop SGM Planning Grant Application
Task 21: Development of a CBGSA Fee Structure	• No work was performed on Task 21 during this period.	0%	• Provide support as needed for development of fee structure

2 Budget Status

Table 4 shows the percent spent for each task under Task Order 1. 100% of the available Task Order 1 budget has been expended ($321,135.00 out of $321,135).

Table 4: Budget Status for Task Order 1

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
1	$ 35,768.00	$ 35,755.53	$ -	$ 35,755.53	$ 12.47	100%
2	$ 61,413.00	$ 61,413.00	$ -	$ 61,413.00	$ -	100%
3	$ 45,766.00	$ 45,766.00	$ -	$ 45,766.00	$ -	100%
4	$ 110,724.00	$ 110,724.00	$ -	$ 110,724.00	$ -	100%
5	$ -	$ -	$ -	$ -	$ -	n/a
6	$ -	$ -	$ -	$ -	$ -	n/a
7	$ 12,120.00	$ 12,120.00	$ -	$ 12,120.00	$ -	100%
8	$ -	$ -	$ -	$ -	$ -	n/a
9	$ -	$ -	$ -	$ -	$ -	n/a
10	$ 45,420.00	$ 45,432.47	$ -	$ 45,432.47	$ (12.47)	100%
11	$ 9,924.00	$ 9,924.00	$ -	$ 9,924.00	$ -	100%
Total	**$ 321,135.00**	**$ 321,135.00**	$ -	**$ 321,135.00**	$ -	**100%**

Table 5 shows the percent spent for each task under Task Order 2. 100% of the available Task Order 2 budget has been expended ($399,469.00 out of $399,469).

Table 5: Budget Status for Task Order 2

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
1	$ -	$ -	$ -	$ -	$ -	n/a
2	$ 48,457.00	$ 48,458.00	$ -	$ 48,458.00	$ (1.00)	100%
3	$ 24,182.00	$ 24,182.00	$ -	$ 24,182.00	$ -	100%
4	$ 103,880.00	$ 103,880.00	$ -	$ 103,880.00	$ -	100%
5	$ 60,676.00	$ 60,676.00	$ -	$ 60,676.00	$ -	100%
6	$ 65,256.00	$ 65,255.00	$ -	$ 65,255.00	$ 1.00	100%
7	$ 36,402.00	$ 36,402.00	$ -	$ 36,402.00	$ -	100%
8	$ -	$ -	$ -	$ -	$ -	n/a
9	$ -	$ -	$ -	$ -	$ -	n/a
10	$ 45,420.00	$ 45,420.00	$ -	$ 45,420.00	$ -	100%
11	$ 15,196.00	$ 15,196.00	$ -	$ 15,196.00	$ -	100%
Total	**$ 399,469.00**	**$ 399,469.00**	**$ -**	**$ 399,469.00**	**$ -**	**100%**

Table 6 shows the percent spent for each task under Task Order 3. 100% of the available Task Order 3 budget has been expended ($188,238.00 out of $188,238).

Table 6: Budget Status for Task Order 3

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
12	$ 53,244.00	$ 53,244.00	$ -	$ 53,244.00	$ -	100%
13	$ 69,706.00	$ 69,706.00	$ -	$ 69,706.00	$ -	100%
14	$ 53,342.00	$ 53,342.00	$ -	$ 53,342.00	$ -	100%
15	$ 11,946.00	$ 11,946.00	$ -	$ 11,946.00	$ -	100%
Total	**$ 188,238.00**	**$ 188,238.00**	$ -	**$ 188,238.00**	**$ -**	**100%**

Table 7 shows the percent spent for each task under Task Order 4. 100% of the available Task Order 4 budget has been expended ($764,394.14 out of $764,396).

Table 7: Budget Status for Task Order 4

Task	Total Budget	Spent Previously	Amount Invoiced This Month	Total Spent to Date	Budget Remaining	% Spent to Date
1	$ -	$ -	$ -	$ -	$ -	n/a
2	$ 24,780.00	$ 24,793.50	$ -	$ 24,793.50	$ (13.50)	100%
3	$ 26,912.00	$ 26,894.00	$ -	$ 26,894.00	$ 18.00	100%
4	$ 280,196.00	$ 280,190.26	$ -	$ 280,190.26	$ 5.74	100%
5	$ 47,698.00	$ 47,641.88	$ -	$ 47,641.88	$ 56.12	100%
6	$ -	$ -	$ -	$ -	$ -	n/a
7	$ 117,010.00	$ 117,009.20	$ -	$ 117,009.20	$ 0.80	100%
8	$ 69,780.00	$ 69,831.25	$ -	$ 69,831.25	$ (51.25)	100%
9	$ 91,132.00	$ 91,567.49	$ -	$ 91,567.49	$ (435.49)	100%
10	$ 70,236.00	$ 69,766.10	$ -	$ 69,766.10	$ 469.90	100%
11	$ 36,652.00	$ 36,700.46	$ -	$ 36,700.46	$ (48.46)	100%
Total	**$ 764,396.00**	**$ 764,394.14**	**$ -**	**$ 764,394.14**	**$ 1.86**	**100%**

Table 8 shows the percent spent for each task under Task Order 5 as of August 30, 2019. 57% of the available Task Order 5 budget has been expended ($263,919.90 out of $459,886).

Table 8: Budget Status for Task Order 5

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
12	$ 196,208.00	$ 126,731.51	$ 2,138.95	$ 128,870.46	$ 67,337.54	66%
13	$ 24,950.00	$ 24,933.01	$ -	$ 24,933.01	$ 16.99	100%
14	$ 204,906.00	$ 80,315.88	$ -	$ 80,315.88	$ 124,590.12	39%
15	$ 33,822.00	$ 29,800.55	$ -	$ 29,800.55	$ 4,021.45	88%
Total	**$ 459,886.00**	**$ 261,780.95**	**$ 2,138.95**	**$ 263,919.90**	**$ 195,966.10**	**57%**

Table 9 shows the percent spent for each task under Task Order 6 as of August 30, 2019. 54% of the available Task Order 6 budget has been expended ($192,988.47 out of $357,405).

Table 9: Budget Status for Task Order 6

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
16	$ 195,658.00	$ 176,701.06	$ 7,922.73	$ 184,623.79	$ 11,034.21	94%
17	$ 57,406.00	$ -	$ 4,100.00	$ 4,100.00	$ 53,306.00	7%
18	$ 12,901.00	$ -	$ 2,934.68	$ 2,934.68	$ 9,966.32	23%
19	$ 18,848.00	$ -	$ 798.00	$ 798.00	$ 18,050.00	4%
20	$ 40,032.00	$ -	$ 532.00	$ 532.00	$ 39,500.00	1%
21	$ 32,560.00	$ -	$ -	$ -	$ 32,560.00	0%
Total	**$ 357,405.00**	$ -	**$ 16,287.41**	**$ 192,988.47**	**$ 164,416.53**	**54%**

3 Schedule Status

The project is on schedule. Work authorized under Task Orders 1, 2, 3 and 4 are complete.

4 Outstanding Issues to be Coordinated

None

HALLMARK GROUP Capital Program Management

INVOICE

1901 Royal Oaks Drive
Suite 200
Sacramento, CA 95815

916 923.1500
hgcpm.com

To: **Cuyama Basin GSA**
c/o Jim Beck
4900 California Avenue, Ste B
Bakersfield, CA 93309

Please Remit To: **Hallmark Group**
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815
P: (916) 923-1500

Invoice No.: 2019-CBGSA-09
Task Orders: CB-HG-003/CB-HG-004
Agreement No. 201709-CB-001
Date: October 11, 2019

For professional services rendered for the month of September 2019

Task Order	Sub Task	Task Description	Billing Classification	Hours	Rate	Amount
CB-HG-003	1	GSA Board of Directors and Advisory Committee Meetings	Executive Director	2.25	$ 250.00	$ 562.50
			Project Coordinator/Admin	2.25	$ 100.00	$ 225.00
					Total Sub Task 1 Labor	**$ 787.50**
CB-HG-003	2	Consultant Management and GSP Development	Executive Director	6.00	$ 250.00	$ 1,500.00
			Project Coordinator/Admin	34.00	$ 100.00	$ 3,400.00
					Total Sub Task 2 Labor	**$ 4,900.00**
CB-HG-003	3	Financial Information Coordination	Executive Director	0.00	$ 250.00	$ -
			Project Controls	1.50	$ 200.00	$ 300.00
			Project Coordinator/Admin	7.00	$ 100.00	$ 700.00
					Total Sub Task 3 Labor	**$ 1,000.00**
CB-HG-003	4	CBGSA Outreach	Executive Director	0.00	$ 250.00	$ -
			Project Coordinator/Admin	2.00	$ 100.00	$ 200.00
					Total Sub Task 4 Labor	**$ 200.00**
					Total Task CB-HG-003 Labor	**$ 6,887.50**
CB-HG-004		Groundwater Extraction Fee Assessment	Executive Director	3.75	$ 250.00	$ 937.50
			Project Coordinator/Admin	14.75	$ 100.00	$ 1,475.00
			E.D. In-Kind Contribution	0.00	$ (250.00)	$ -
					Total Task CB-HG-004 Labor	**$ 2,412.50**
					Total Labor	**$ 9,300.00**
			Travel			$ -
			Conference Calls			$ 178.69
			Printing Costs			$ -
					SubTotal Travel and Other Direct Costs	**$ 178.69**
			ODC Mark Up		5%	$ 8.93
					Total Travel and Other Direct Costs	**$ 187.62**
					TOTAL AMOUNT DUE FOR THIS INVOICE	**$ 9,487.62**

Task Order	Original Totals	Amendment(s)	Total Committed	Previously Billed	Current Billing	Remaining Balance
CB-HG-003	$ 212,810.00	$ -	$ 212,810.00	$ 136,437.50	$ 6,887.50	$ 69,485.00
CB-HG-004	$ 22,500.00	$ -	$ 22,500.00	$ 1,737.50	$ 2,412.50	$ 18,350.00
Travel and ODC	$ -	$ -	$ -	$ 4,521.66	$ 187.62	$ (4,709.28)
Total	$ 235,310.00	$ -	$ 235,310.00	$ 142,696.66	$ 9,487.62	$ 83,125.72

HALLMARK GROUP Capital Program Management

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

PROGRESS REPORT FOR TASK ORDER CB-HG-003 & CB-HG-004

Client Name:	Cuyama Basin Groundwater Sustainability Agency	**Agreement Number:**	201709-CB-001
Company Name:	HGCPM, Inc. DBA The Hallmark Group	**Address:**	1901 Royal Oaks Drive, Suite 200 Sacramento, CA 95815
Task Order Number:	CB-HG-003 & CB-HG-004	**Report Period:**	September 1-30, 2019
Progress Report Number:	9	**Project Manager:**	Jim Beck
Invoice Number:	2019-CBGSA-09	**Invoice Date:**	October 11, 2019

SUMMARY OF WORK PERFORMED

Task Order 3

Task 1: Board and Standing Advisory Committee Meeting Facilitation

- Coordinated, prepared for, and attended Cuyama Basin Groundwater Sustainability Agency (CBGSA) update meeting with CBGSA Board Chair on September 24, 2019.
- Coordinated, prepared for, and attended CBGSA update meeting with CBGSA SAC Chair and SAC Vice Chair on September 24, 2019.

Task 2: GSP Consultant Management and GSP Development

- Prepared for, met with, and facilitated CBGSA Program Management Team (PMT) on a weekly basis to discuss GSP section progress and outreach.
- Drafted, prepared, and distributed documents to discuss the Cuyama Basin Water District (CBWD) management agreement at the CBGSA ad hoc meeting on September 6, 2019.
- Coordinated, prepared for, and attended teleconference ad hoc meeting on September 6, 2019 to discuss the CBWD management agreement.
- Developed, refined, distributed, and discussed the CBWD management agreement with A. Doud and D. Yurosek.
- Discussed term sheet status with A. Doud and M. Klinchuch.
- Reviewed Prop 68 ad hoc options and recommendations and discussed with Woodard & Curran (W&C).
- Prepared for and attended Prop 68 webinar on September 17, 2019.
- Developed, refined, and distributed material to the Prop 68 ad hoc for comment and review.
- Developed, refined, and distributed Prop 68 list to PMT.
- Discussed monitoring network agreement considerations with legal counsel and discussed with W&C.
- Developed map outlining potential monitoring well locations.
- Coordinated stream gage locations for bio/cultural report with W&C.

- Attended conference call with SVB biologist.
- Performed field work and discussed California Department of Water Resources (DWR) Technical Support Services (TSS) California Environmental Quality Act (CEQA) strategy with legal counsel and W&C.
- Discussed and developed CEQA task list with W&C and sent to legal counsel.
- Discussed CEQA issues with Rosalyn and sent determinations to legal counsel.
- Coordinated with W&C on DWR TSS application.
- Prepared for and attended Groundwater Sustainability Plan (GSP) upload webinar with W&C on September 16, 2019.

Task 3: Financial Management

- Coordinated, prepared for, and attended meeting with legal counsel on September 20, 2019 to review CBGSA budget and forecasted actuals, and to discuss CBWD agreement and groundwater extraction materials.
- Refined budget and forecasted actuals for legal counsel.
- Reviewed and discussed Integrated Regional Water Management (IRWM) program with Santa Barbara County Public Works' F. Crease on September 27, 2019.
- Fiscal Year 2020 budget review.
- Billing and administration.

Task 4: Stakeholder Outreach Facilitation

- Distributed public hearing notices to Board, Standing Advisory Committee (SAC), and stakeholders.
- Discussed outreach strategy for November 6, 2019 Board meeting, SAC meeting, and public hearings with the Catalyst Group.

Task Order 4

Task 1: Development of Groundwater Extraction Fee

- Drafted, prepared, and distributed documents to discuss the Groundwater Extraction Fee at the CBGSA ad hoc meetings on September 13 and 26, 2019.
- Coordinated, prepared for, and attended teleconference ad hoc meetings on September 13 and 26, 2019 to discuss the Groundwater Extraction Fee.
- Reviewed mount basin for Groundwater Extraction Fee development.
- Developed policy for Groundwater Extraction Fee and researched penalty fees.
- Discussed livestock watering comment with stakeholder.

DELIVERABLES AND COMPLETED TASKS

- Prepared for, met with, and facilitate CBGSA program management team on a weekly basis.

PLANNED OBJECTIVES FOR NEXT REPORTING PERIOD

- Prepare for and attend CBGSA Board meeting, SAC meeting, and public hearings on November 6, 2019.

SIGNIFICANT ISSUES OR CHALLENGES (IF ANY) AND POTENTIAL RESOLUTIONS

- N/A

Invoice Date: 10/1/2019
Total: $553.73
Statement# 41393 Customer# 3122729

HGCPM, Inc. - Formerly Advance Education
1901 Royal Oaks Dr
STE 200
Sacramento, CA 95815 -4235

Remit to:
Great America Networks Conferencing
1441 Branding Ave
Suite 200
Downers Grove, IL 60515 0000

CALL US
1-877-438-4261

Summary

Balance Information	
Previous Balance	(16.47)
Balance Forward	(16.47)
New Charges	
New Usage Charges	456.15
Recurring Charges	0.00
Taxes and Surcharges	114.05
Total New Charges	570.20
Total Amount Due	553.73

Taxes and Surcharges

Federal Universal Service Fund	114.05
Subtotal	$114.05

Management Reports

Usage by Category

Description	Calls	Minutes	Charge
Usage - Conference Calling	179	9,123.00	456.15
	179.00	9,123.00	456.15

Long Distance By Line

TN	Calls	Mins	Charge
	179	9,123.00	456.15
	179	9,123.00	456.15

Toll-free Usage

Cuyama BDSAC Conference ID: 4954188

#	Date	Time	Other	Location	Mins	Amt
1	09/06/19	04:56P	8056814200	Host	62.00	3.10
2	09/06/19	04:59P	6613302610	Host	58.00	2.90
3	09/06/19	04:59P	6613638463	Host	59.00	2.95
4	09/06/19	04:59P	6614773385	Host	59.00	2.95
5	09/06/19	04:59P	8053314650	Host	58.00	2.90
6	09/06/19	05:01P	6613337091	Host	57.00	2.85
7	09/06/19	05:01P	6613951000	Host	56.00	2.80
8	09/06/19	05:02P	8056814200	Host	56.00	2.80
Subtotal			465.00			23.25

Cuyama BDSAC Conference ID: 4961495

#	Date	Time	Other	Location	Mins	Amt
1	09/13/19	12:55P	6613337091	Host	78.00	3.90
2	09/13/19	12:55P	8057662894	Host	79.00	3.95
3	09/13/19	12:57P	8052371481	Host	77.00	3.85
4	09/13/19	12:58P	6614773385	Host	76.00	3.80
5	09/13/19	12:59P	8056802226	Host	70.00	3.50
6	09/13/19	01:00P	6613951000	Host	73.00	3.65
7	09/13/19	01:00P	6618455256	Host	73.00	3.65
8	09/13/19	01:00P	8056160470	Host	73.00	3.65
Subtotal			599.00			29.95

Cuyama BDSAC Conference ID: 4973079

#	Date	Time	Other	Location	Mins	Amt
1	09/24/19	04:28P	6614773385	Host	51.00	2.55
2	09/24/19	04:30P	6613337091	Host	49.00	2.45
3	09/24/19	04:33P	6613302610	Host	45.00	2.25
Subtotal			145.00			7.25

Cuyama BDSAC Conference ID: 4973140

#	Date	Time	Other	Location	Mins	Amt
1	09/24/19	05:27P	6614773385	Host	58.00	2.90
2	09/24/19	05:27P	8058867239	Host	58.00	2.90
3	09/24/19	05:28P	8318182451	Host	58.00	2.90
4	09/24/19	05:30P	6613337091	Host	55.00	2.75
Subtotal			229.00			11.45

Cuyama BDSAC Conference ID: 4975940

#	Date	Time	Other	Location	Mins	Amt
1	09/26/19	04:56P	8313854177	Host	57.00	2.85
2	09/26/19	04:57P	6613337091	Host	56.00	2.80
3	09/26/19	04:57P	6614773385	Host	55.00	2.75
4	09/26/19	04:59P	6618455256	Host	53.00	2.65
5	09/26/19	05:00P	8056802226	Host	53.00	2.65
6	09/26/19	05:02P	6613951000	Host	51.00	2.55
7	09/26/19	05:03P	8056542040	Host	50.00	2.50

Subtotal		375.00			18.75

Cuyama GSA Conference ID: 0

#	Date	Time	Other	Location	Mins	Amt
1	09/23/19	12:11P	4157938420	Host	1.00	.05
Subtotal			1.00			.05

Cuyama GSA Conference ID: 4953784

#	Date	Time	Other	Location	Mins	Amt
1	09/06/19	11:57A	4157938420	Host	51.00	2.55
2	09/06/19	11:58A	6613337091	Host	50.00	2.50
3	09/06/19	11:58A	6614773385	Host	50.00	2.50
4	09/06/19	11:59A	6613951000	Host	50.00	2.50
5	09/06/19	12:00P	9169998777	Host	49.00	2.45
6	09/06/19	12:02P	4155242290	Host	47.00	2.35
7	09/06/19	12:10P	9258581340	Host	15.00	.75
Subtotal			312.00			15.60

Cuyama GSA Conference ID: 4961374

#	Date	Time	Other	Location	Mins	Amt
1	09/13/19	11:58A	6613337091	Host	9.00	.45
2	09/13/19	11:58A	6614773385	Host	56.00	2.80
3	09/13/19	12:00P	4157938420	Host	55.00	2.75
4	09/13/19	12:01P	9169998777	Host	54.00	2.70
5	09/13/19	12:02P	9256274112	Host	53.00	2.65
6	09/13/19	12:07P	6613337091	Host	48.00	2.40
7	09/13/19	12:11P	6613951000	Host	44.00	2.20
Subtotal			319.00			15.95

Cuyama GSA Conference ID: 4969073

#	Date	Time	Other	Location	Mins	Amt
1	09/20/19	11:57A	4157938420	Host	49.00	2.45
2	09/20/19	12:00P	6613337091	Host	46.00	2.30
3	09/20/19	12:00P	6614773385	Host	46.00	2.30
4	09/20/19	12:01P	9169998777	Host	7.00	.35
5	09/20/19	12:02P	4155242290	Host	44.00	2.20
6	09/20/19	12:02P	9256274112	Host	25.00	1.25
7	09/20/19	12:08P	9169998777	Host	39.00	1.95
8	09/20/19	12:29P	9258581340	Host	17.00	.85
Subtotal			273.00			13.65

Cuyama GSA Conference ID: 4969217

#	Date	Time	Other	Location	Mins	Amt
1	09/20/19	01:01P	6613951000	Host	2.00	.10
Subtotal			2.00			.10

Cuyama GSA Conference ID: 4976897

#	Date	Time	Other	Location	Mins	Amt
1	09/27/19	11:56A	6613337091	Host	31.00	1.55
2	09/27/19	11:59A	4155242290	Host	27.00	1.35
3	09/27/19	11:59A	4157938420	Host	27.00	1.35
4	09/27/19	11:59A	6613340233	Host	27.00	1.35
5	09/27/19	12:00P	9169998777	Host	27.00	1.35
Subtotal			139.00			6.95

A	Cuyama Charges:		
		6-Sep	$23.25
		6-Sep	$15.60
		13-Sep	$29.95
		13-Sep	$15.95
		20-Sep	$13.65
		20-Sep	$0.10
		23-Sep	$0.05
		24-Sep	$7.25
		24-Sep	$11.45
		26-Sep	$18.75
		27-Sep	$6.95
B	Subtotal		$142.95
C	Total Conf Line Charge		$456.15
D	Total Taxes and Surcharges		$114.05
E	Tax and Surcharges Rate (D/C)		25.0%
F	Tax and Surcharges Incurred by Cuyama (B*E)		$35.74
G	Total Cuyama Charge (B+F)		**$178.69**

KLEIN, DENATALE, GOLDNER
COOPER, ROSENLIEB & KIMBALL, LLP

4550 CALIFORNIA AVENUE
SECOND FLOOR
BAKERSFIELD, CA 93309

MAILING ADDRESS:
P.O. BOX 11172
BAKERSFIELD, CA 93389-1172
(661) 395-1000
FAX (661) 326-0418
E-MAIL accounting@kleinlaw.com

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY
C/O HALLMARK GROUP
******EMAIL INVOICES******

September 30, 2019
Bill No. 22930-001-149570
JDH

Statement for Period through September 19, 2019

Re: 22930 - CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY
001 GENERAL BUSINESS

Date		Services	Hours	Amount
08/19/19	AND	RESEARCHED AB 434'S APPLICABILITY AND SCOPE AS IT RELATES TO THE ENTITIES THAT RECEIVE STATE FUNDING; DRAFTED E-MAIL ANSWERING QUESTION REGARDING APPLICABILITY OF NEW STATE ADA REQUIREMENTS ON WEBSITES.	1.00	150.00
08/21/19	JDH	TELEPHONE CONFERENCE WITH J. BECK AND T. BLAKSLEE REGARDING FEE AD HOC MEETING.	0.50	135.00
08/22/19	JDH	CONFERENCE CALL WITH EXTRACTION FEE AD HOC COMMITTEE.	1.50	405.00
08/22/19	JDH	TELEPHONE CONFERENCE WITH J. BECK AND T. BLAKSLEE REGARDING DELEGATION AGREEMENT MEETING PREPARATION.	0.50	135.00
08/23/19	JDH	TELEPHONE CONFERENCE WITH A. DOUD REGARDING PROCESS FOR DELEGATION AGREEMENT PREPARATION.	0.20	54.00
08/23/19	JDH	CONFERENCE CALL WITH DELEGATION AGREEMENT AD HOC COMMITTEE.	1.20	324.00
08/26/19	JDH	REVISED DELEGATION AGREEMENT TERM SHEET; TELEPHONE CONFERENCE WITH J. BECK REGARDING SAME.	1.30	351.00
08/26/19	JDH	WEEKLY PMT CALL.	1.60	432.00
08/28/19	GM	RESEARCH REGARDING EXTRACTION FEES AS APPLIED TO STATE, FEDERAL, AND TRIBAL ENTITIES.	2.00	300.00
08/28/19	JDH	TELEPHONE CONFERENCE WITH A. DOUD REGARDING DELEGATION AGREEMENT.	0.20	54.00

KLEIN, DENATALE, GOLDNER, COOPER, ROSENLIEB & KIMBALL, LLP

Bill No. 22930-001-149570 **September 30, 2019** **Page 2**
Client Ref: 22930 - 001

Date		Services	Hours	Amount
08/29/19	GM	COMPLETED RESEARCH REGARDING GROUNDWATER EXTRACTION FEES; DRAFTED MEMORANDUM REGARDING SAME.	2.50	375.00
08/30/19	JDH	WEEKLY PMT CALL.	0.80	216.00
08/30/19	JDH	REVISED ACCESS AGREEMENT FOR CBGSA; E-MAILED SAME TO B. LINDIEN AND T. BLAKSLEE.	0.50	135.00
08/31/19	JDH	REVIEWED ADA COMPLIANCE STATUTE; E-MAILED BRIAN V. REGARDING SAME.	0.50	135.00
09/03/19	JDH	TELEPHONE CONFERENCE WITH A. DOUD REGARDING CBWD COMMENTS TO REVISED TERM SHEET.	0.50	135.00
09/03/19	JVK	CONFERENCE WITH J. HUGHES REGARDING FIELD WORK CEQA EXEMPTION.	0.20	54.00
09/04/19	JDH	TELEPHONE CONFERENCE WITH T. BLAKSLEE AND W&C REGARDING CEQA.	0.50	135.00
09/04/19	JVK	PREPARED FOR AND PARTICIPATED IN CONFERENCE CALL REGARDING CEQA EXEMPTION AND STREAM GAUGES; E-MAILED T. BLAKSLEE REGARDING CEQA EXEMPTION.	1.30	351.00
09/06/19	JDH	WEEKLY PMT CALL.	0.80	216.00
09/06/19	JDH	TELEPHONE CONFERENCE WITH J. BECK REGARDING ADMINISTRATIVE COSTS AND CBWD AGREEMENT.	0.20	54.00
09/06/19	JDH	CONFERENCE CALL WITH CBWD AGREEMENT AD HOC COMMITTEE; PREPARED FOR SAME.	1.20	324.00
09/10/19	JDH	TELEPHONE CONFERENCE WITH A. DOUD REGARDING DELEGATION AGREEMENT TERM SHEET.	0.60	162.00
09/13/19	JDH	WEEKLY PMT CALL.	0.80	216.00
09/13/19	JDH	EXTRACTION FEE AD HOC COMMITTEE CONFERENCE CALL.	1.20	324.00

		Rate	Hours	Amount
AND	DOMINGUEZ, ALEX	150.00	1.00	150.00
JDH	HUGHES, JOSEPH	270.00	14.60	3,942.00
JVK	KOMAR, JOHN	270.00	1.50	405.00
GM	MAYA, GUSTAVO	150.00	4.50	675.00
Total Fees				**$5,172.00**

Current Charges	**$5,172.00**
Prior Statement Balance	12,714.80
Payments/Adjustments Since Last Bill	-0.00

PAYMENT DUE UPON RECEIPT
PLEASE REFER TO BILL NUMBER LOCATED BENEATH STATEMENT DATE WHEN SUBMITTING PAYMENT
TO ENSURE PROPER CREDIT.
A FINANCE CHARGE OF 1 1/2% PER MONTH (18% ANNUALLY) WILL BE CHARGED ON ALL BALANCES OVER 30 DAYS.
FEDERAL I.D. NO. 95-2298220

KLEIN, DENATALE, GOLDNER, COOPER, ROSENLIEB & KIMBALL, LLP

Bill No. 22930-001-149570 **September 30, 2019** **Page 3**
Client Ref: 22930 - 001

Pay This Amount	**$17,886.80**

Any Payments Received After September 30, 2019 Will Appear on Your Next Statement

WOODARD &CURRAN

COMMITMENT & INTEGRITY
DRIVE RESULTS

Remit to:
PO Box 55008
Boston, MA 02205-5008

T 800.426.4262
T 207.774.2112
F 207.774.6635

TD BANK
Electronic Transfer:
⑆211274450⑆ 2427662596⑈

INVOICE

Jim Beck
Executive Director
Cuyama Basin Groundwater Sustainability Agency
c/o Hallmark Group
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815

October 29, 2019
Project No: 0011078.01
Invoice No: 169011

Project 0011078.01 CUYAMA GSP

Professional Services for the period ending September 27, 2019

Phase 012 GW Monitoring Well Network Expansion (Cat 1 – Task 1)

Consultant

Sub - Engineering

10/10/2019	GSI Water Solutions DBA Groundwater Solutions, Inc.	Ma, Tao		44.00	
10/10/2019	GSI Water Solutions DBA Groundwater Solutions, Inc.	O'Rourke, David		442.00	
	Consultant Total		**1.1 times**	**486.00**	**534.60**
			Total this Phase		**$534.60**

Phase 014 Surface Water Monitoring Program (Cat 1 – Task 3)

Professional Personnel

	Hours	**Rate**	**Amount**	
Project Manager 2				
Ayres, John	2.00	266.00	532.00	
Totals	2.00		532.00	
Labor Total				**532.00**
		Total this Phase		**$532.00**

Phase 015 Project Management (Cat 1 – Task 4)

Professional Personnel

	Hours	**Rate**	**Amount**	
National Practice Leader				
Melton, Lyndel	1.00	320.00	320.00	
Planner 2				
Kidson, Jennifer	1.50	187.00	280.50	
Totals	2.50		600.50	
Labor Total				**600.50**
		Total this Phase		**$600.50**

Please include our invoice number in your remittance. Thank you.

Project	0011078.01	CUYAMA GSP	Invoice	169011

Phase 016 Finalize GSP Development

Professional Personnel

	Hours	Rate	Amount	
Engineer 3				
Ceyhan, Mahmut	1.50	212.00	318.00	
National Practice Leader				
Melton, Lyndel	2.50	320.00	800.00	
Planner 2				
Kidson, Jennifer	4.25	187.00	794.75	
Project Assistant				
Hughart, Desiree	2.00	110.00	220.00	
Project Manager 2				
Van Lienden, Brian	9.00	266.00	2,394.00	
Totals	19.25		4,526.75	
Labor Total				**4,526.75**
			Total this Phase	**$4,526.75**

Phase 018 Outreach

Professional Personnel

	Hours	Rate	Amount	
Graphic Artist				
Fox, Adam	1.00	118.00	118.00	
Totals	1.00		118.00	
Labor Total				**118.00**

Consultant

Sub - Consultant Miscellaneous

9/27/2019	The Catalyst Group, Inc.	Inv 434		1,595.00	
Consultant Total			**1.1 times**	**1,595.00**	**1,754.50**
				Total this Phase	**$1,872.50**

Phase 019 Support for DWR Technical Support Services

Professional Personnel

	Hours	Rate	Amount	
Project Manager 2				
Van Lienden, Brian	7.00	266.00	1,862.00	
Senior Project Manager				
Prickett, Rosalyn	3.00	282.00	846.00	
Totals	10.00		2,708.00	
Labor Total				**2,708.00**
			Total this Phase	**$2,708.00**

Project	0011078.01	CUYAMA GSP	Invoice	169011

Phase 020 Preparation of SGM Grant Program Planning Grant Application

Professional Personnel

	Hours	Rate	Amount	
Engineer 2				
Wicks, Matthew	14.50	187.00	2,711.50	
Project Manager 2				
Van Lienden, Brian	16.00	266.00	4,256.00	
Totals	30.50		6,967.50	
Labor Total				**6,967.50**
			Total this Phase	**$6,967.50**
			Total this Invoice	**$17,741.85**

Outstanding Invoices

Number	Date	Balance
166794	8/28/2019	176,701.06
167930	10/1/2019	18,426.36
Total		**195,127.42**

	Current Fee	Previous Fee	Total
Project Summary	**17,741.85**	**2,130,144.50**	**2,147,886.35**

Approved by: 

Brian Van Lienden
Project Manager
Woodard & Curran

Progress Report

Cuyama Basin Groundwater Sustainability Plan Development

Subject:	**September 2019 Progress Report**
Prepared for:	Jim Beck, Executive Director, Cuyama Basin Groundwater Sustainability Agency (CBGSA)
Prepared by:	Brian Van Lienden, Woodard & Curran
Reviewed by:	Lyndel Melton, Woodard & Curran
Date:	October 29, 2019
Project No.:	0011078.01

This progress report summarizes the work performed and project status for the period of August 31, 2019 through September 27, 2019 on the Cuyama Basin Groundwater Sustainability Plan Development project. The work associated with this invoice was performed in accordance with our Consulting Services Agreement dated December 6, 2017, and with Task Order 5, issued by the CBGSA on June 6, 2018, and Task Order 6, issued by the CBGSA on August 7, 2019. Note that Task Orders 1, 2, 3 and 4 were already 100% spent as of the beginning of this reporting period.

The progress report contains the following sections:

1. Work Performed
2. Budget Status
3. Schedule Status
4. Outstanding Issues to be Coordinated

1 Work Performed

A summary of work performed on the project during the current reporting period is provided in Tables 1, 2 and 3 below. Table 1 shows work performed under Task Orders 2 and 4, which include tasks identified in the Category 2 grant from the California Department of Water Resources (DWR). Table 2 shows work performed under Task Orders 3 and 5, which includes tasks identified in the Category 1 grant from DWR. Table 3 shows work performed under Task Order 6.

Table 1: Summary of Task/Deliverables Status for Category 2 Tasks (Task Orders 2 and 4)

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 1: Initiate Work Plan for GSP and Stakeholder Engagement Strategy Development	• Task 1 is completed; no work was undertaken on this task during this reporting period	100%	• Task 1 is completed; no further work is anticipated
Task 2: Data Management System, Data Collection and Analysis, and Plan Review	• Task 2 is completed; no work was undertaken on this task during this reporting period	100%	• Task 2 is completed; no further work is anticipated
Task 3: Description of the Plan Area, Hydrogeologic Conceptual Model, and Groundwater Conditions	• Task 3 is completed; no work was undertaken on this task during this reporting period	100%	• Task 3 is completed; no further work is anticipated
Task 4: Basin Model and Water Budget	• Task 4 is completed; no work was undertaken on this task during this reporting period	100%	• Task 4 is completed; no further work is anticipated
Task 5: Establish Basin Sustainability Criteria	• Task 5 is completed; no work was undertaken on this task during this reporting period	100%	• Task 5 is completed; no further work is anticipated
Task 6. Monitoring Networks	• Task 6 is completed; no work was undertaken on this task during this reporting period	100%	• Task 6 is completed; no further work is anticipated
Task 7: Projects and Actions for Sustainability Goals	• Task 7 is completed; no work was undertaken on this task during this reporting period	100%	• Task 7 is completed; no further work is anticipated

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 8. GSP Implementation	• Task 8 is completed; no work was undertaken on this task during this reporting period	100%	• Task 8 is completed; no further work is anticipated
Task 9. GSP Development	• Task 9 is completed; no work was undertaken on this task during this reporting period	100%	• Task 9 is completed; no further work is anticipated; additional work to complete the GSP will be performed under Task 16
Task 10: Education, Outreach and Communication	• Task 10 is completed; no work was undertaken on this task during this reporting period	100%	• Task 10 is completed; no further work is anticipated; additional outreach and communication work will be performed under Tasks 17 and 18
Task 11: Project Management	• Task 11 is completed; no work was undertaken on this task during this reporting period	100%	• Task 11 is completed; no further work is anticipated. Further project management activities will be covered in Tasks 15 and 16.

Table 2: Summary of Task/Deliverables Status for Category 1 Tasks (Task Orders 3 and 5)

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 12: Groundwater Monitoring Well Network Expansion	• Solicitation of partners for groundwater well installation	70%	• Once partners have been identified, work will commence to perform the field work required to install the data sensors
Task 13: Evapotranspiration Evaluation for Cuyama Basin Region	• No work was performed on Task 13 during this period.	100%	• Task 13 is completed; no further work is anticipated
Task 14: Surface Water Monitoring Program	• Mapping of potential stream gage locations	50%	• Work will continue to install the surface flow gages

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 15: Category 1 Project Management	• Ongoing project management and grant administration activities	93%	• Ongoing project management and grant administration activities

Table 3: Summary of Task/Deliverables Status for Task Order 6

Task	Work Completed During the Reporting Period	Percent Complete	Work Scheduled for Next Period
Task 16: Finalize GSP Development	• Respond to requests for modeling data • Ongoing project coordination activities • Grant administration activities	97%	• Update GSP document in response to Board comments • Ongoing project coordination and grant administration activities
Task 17: Stakeholder & Board Engagement	• No work was performed on Task 17 during this period.	7%	• Support for upcoming SAC and Board meetings
Task 18: Outreach Support	• Ongoing stakeholder outreach activities related to GSP review and development	38%	• Ongoing CBGSA outreach support
Task 19: Support for DWR Technical Support Services	• Calls and discussion related to CEQA and permitting requirements for TSS activities	20%	• Participate in additional ad-hoc committee calls and prepare required documents for DWR
Task 20: Prepare SGM Planning Grant Application	• Develop initial workplan, schedule and budget documents for grant application	20%	• Develop SGM Planning Grant Application
Task 21: Development of a CBGSA Fee Structure	• No work was performed on Task 21 during this period.	0%	• Provide support as needed for development of fee structure

2 Budget Status

Table 4 shows the percent spent for each task under Task Order 1. 100% of the available Task Order 1 budget has been expended ($321,135.00 out of $321,135).

Table 4: Budget Status for Task Order 1

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
1	$ 35,768.00	$ 35,755.53	$ -	$ 35,755.53	$ 12.47	100%
2	$ 61,413.00	$ 61,413.00	$ -	$ 61,413.00	$ -	100%
3	$ 45,766.00	$ 45,766.00	$ -	$ 45,766.00	$ -	100%
4	$ 110,724.00	$ 110,724.00	$ -	$ 110,724.00	$ -	100%
5	$ -	$ -	$ -	$ -	$ -	n/a
6	$ -	$ -	$ -	$ -	$ -	n/a
7	$ 12,120.00	$ 12,120.00	$ -	$ 12,120.00	$ -	100%
8	$ -	$ -	$ -	$ -	$ -	n/a
9	$ -	$ -	$ -	$ -	$ -	n/a
10	$ 45,420.00	$ 45,432.47	$ -	$ 45,432.47	$ (12.47)	100%
11	$ 9,924.00	$ 9,924.00	$ -	$ 9,924.00	$ -	100%
Total	**$ 321,135.00**	**$ 321,135.00**	$ -	**$ 321,135.00**	$ -	**100%**

Table 5 shows the percent spent for each task under Task Order 2. 100% of the available Task Order 2 budget has been expended ($399,469.00 out of $399,469).

Table 5: Budget Status for Task Order 2

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
1	$ -	$ -	$ -	$ -	$ -	n/a
2	$ 48,457.00	$ 48,458.00	$ -	$ 48,458.00	$ (1.00)	100%
3	$ 24,182.00	$ 24,182.00	$ -	$ 24,182.00	$ -	100%
4	$ 103,880.00	$ 103,880.00	$ -	$ 103,880.00	$ -	100%
5	$ 60,676.00	$ 60,676.00	$ -	$ 60,676.00	$ -	100%
6	$ 65,256.00	$ 65,255.00	$ -	$ 65,255.00	$ 1.00	100%
7	$ 36,402.00	$ 36,402.00	$ -	$ 36,402.00	$ -	100%
8	$ -	$ -	$ -	$ -	$ -	n/a
9	$ -	$ -	$ -	$ -	$ -	n/a
10	$ 45,420.00	$ 45,420.00	$ -	$ 45,420.00	$ -	100%
11	$ 15,196.00	$ 15,196.00	$ -	$ 15,196.00	$ -	100%
Total	**$ 399,469.00**	**$ 399,469.00**	**$ -**	**$ 399,469.00**	**$ -**	**100%**

Table 6 shows the percent spent for each task under Task Order 3. 100% of the available Task Order 3 budget has been expended ($188,238.00 out of $188,238).

Table 6: Budget Status for Task Order 3

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
12	$ 53,244.00	$ 53,244.00	$ -	$ 53,244.00	$ -	100%
13	$ 69,706.00	$ 69,706.00	$ -	$ 69,706.00	$ -	100%
14	$ 53,342.00	$ 53,342.00	$ -	$ 53,342.00	$ -	100%
15	$ 11,946.00	$ 11,946.00	$ -	$ 11,946.00	$ -	100%
Total	**$ 188,238.00**	**$ 188,238.00**	$ -	**$ 188,238.00**	**$ -**	**100%**

Table 7 shows the percent spent for each task under Task Order 4. 100% of the available Task Order 4 budget has been expended ($764,394.14 out of $764,396).

Table 7: Budget Status for Task Order 4

Task	Total Budget	Spent Previously	Amount Invoiced This Month	Total Spent to Date	Budget Remaining	% Spent to Date
1	$ -	$ -	$ -	$ -	$ -	n/a
2	$ 24,780.00	$ 24,793.50	$ -	$ 24,793.50	$ (13.50)	100%
3	$ 26,912.00	$ 26,894.00	$ -	$ 26,894.00	$ 18.00	100%
4	$ 280,196.00	$ 280,190.26	$ -	$ 280,190.26	$ 5.74	100%
5	$ 47,698.00	$ 47,641.88	$ -	$ 47,641.88	$ 56.12	100%
6	$ -	$ -	$ -	$ -	$ -	n/a
7	$ 117,010.00	$ 117,009.20	$ -	$ 117,009.20	$ 0.80	100%
8	$ 69,780.00	$ 69,831.25	$ -	$ 69,831.25	$ (51.25)	100%
9	$ 91,132.00	$ 91,567.49	$ -	$ 91,567.49	$ (435.49)	100%
10	$ 70,236.00	$ 69,766.10	$ -	$ 69,766.10	$ 469.90	100%
11	$ 36,652.00	$ 36,700.46	$ -	$ 36,700.46	$ (48.46)	100%
Total	**$ 764,396.00**	**$ 764,394.14**	**$ -**	**$ 764,394.14**	**$ 1.86**	**100%**

Table 8 shows the percent spent for each task under Task Order 5 as of September 27, 2019. 58% of the available Task Order 5 budget has been expended ($265,587.00 out of $459,886).

Table 8: Budget Status for Task Order 5

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
12	$ 196,208.00	$ 126,731.51	$ 2,673.55	$ 129,405.06	$ 66,802.94	66%
13	$ 24,950.00	$ 24,933.01	$ -	$ 24,933.01	$ 16.99	100%
14	$ 204,906.00	$ 80,315.88	$ 532.00	$ 80,847.88	$ 124,058.12	39%
15	$ 33,822.00	$ 29,800.55	$ 600.50	$ 30,401.05	$ 3,420.95	90%
Total	**$ 459,886.00**	**$ 261,780.95**	**$ 3,806.05**	**$ 265,587.00**	**$ 194,299.00**	**58%**

Table 9 shows the percent spent for each task under Task Order 6 as of September 27, 2019. 58% of the available Task Order 6 budget has been expended ($209,063.22 out of $357,405).

Table 9: Budget Status for Task Order 6

Task	Total Budget	Spent Previously	Spent this Period	Total Spent to Date	Budget Remaining	% Spent to Date
16	$ 195,658.00	$ 184,623.79	$ 4,526.75	$ 189,150.54	$ 6,507.46	97%
17	$ 57,406.00	$ 4,100.00	$ -	$ 4,100.00	$ 53,306.00	7%
18	$ 12,901.00	$ 2,934.68	$ 1,872.50	$ 4,807.18	$ 8,093.82	37%
19	$ 18,848.00	$ 798.00	$ 2,708.00	$ 3,506.00	$ 15,342.00	19%
20	$ 40,032.00	$ 532.00	$ 6,967.50	$ 7,499.50	$ 32,532.50	19%
21	$ 32,560.00	$ -	$ -	$ -	$ 32,560.00	0%
Total	**$ 357,405.00**	**$ 192,988.47**	**$ 16,074.75**	**$ 209,063.22**	**$ 148,341.78**	**58%**

3 Schedule Status

The project is on schedule. Work authorized under Task Orders 1, 2, 3 and 4 are complete.

4 Outstanding Issues to be Coordinated

None

TO: Board of Directors
Agenda Item No. 12

FROM: Jim Beck, Executive Director

DATE: November 6, 2019

SUBJECT: Correspondence

Issue
Review of correspondence.

Recommended Motion
None – information only.

Discussion
Provided as Attachment 1 is correspondence received form the below individual(s):

- Kathleen Marsh, Walking U Ranch

From: K. P. March <kmarch@bkylawfirm.com>
Sent: Thursday, October 17, 2019 7:54 PM
To: Taylor Blakslee <TBlakslee@hgcpm.com>
Subject: To the Cuyama Basin Groundwater Sustainability Agency ("CBGSA") regarding your final draft GSP; From Walking U Ranch, LLC, by Kathleen P. March, Esq., managing member of , LLC; Attn: Talyor Blakslee: Please POST as the Objection and Public Comment of W

101719

To the Cuyama Basin Groundwater Sustainability Agency ("CBGSA") regarding your final draft GSP

From Walking U Ranch, LLC, by Kathleen P. March, Esq., sole managing member of Walking U Ranch, LLC

Attn: Talyor Blakslee**: Please POST as the Objection and Public Comment of Walking U Ranch, LLC to CBGSP, and please to give to each member of CBGSA, and please give to the attorney(s) for CBGSA**

Dear CBGSA:

I just read the final draft proposed Cuyama Basis GSP ("GSP"), using the link that Taylor Blakslee sent today, 10/17/19. I write as managing member of Walking U Ranch, LLC, which owns and runs a 1000 acre cattle ranch located in the west end of the cuyama valley, 33 miles east of Santa Maria, CA.

Walking U Ranch, LLC objects to the GSP.

The proposed funding for the GSP is **directly CONTRARY** to what the vote was, taken on 7/10/19, of the full Cuyama Basin GSA, on how to fund the Cuyama Basin GSP. My husband and I (yes we are both lawyers) were present, and I spoke to GSA. In addition, I had briefed the controlling law, by letters to the GSA, before the 7/10/19 meeting.

The vote of the full CBGSA, on 7/10/19, which was practically unanimous, was to fund the Cuyama Basin GSP **by charging fees based on water extracted**, and **NOT to fund the GSP by charging any per acre fees**.

Directly contrary to that vote of the full GSA, the "final proposed draft" GSP, at Section 8 (Implementation) at pages 8-4 to 8-5, and in the executive summary, says the GSP may be funded by charging extraction fees, **or by charging per acre assessments**, or by a combination of both means. Here is the specific language at p.8-4 and 8-5 of the GSP:

"the CBGSA will develop a financing plan that will include one or more of the following financing approaches:

> • Pumping Fees: Pumping fees would implement a charge for pumping that would be used to fund GSP implementation activities. To meet the funding needs of the GSP, fees would be lower when pumping is higher, such as current pumping levels, and higher when pumping is lower, such as when sustainable pumping levels are achieved. Although this funding approach would meet the financial needs of the GSP and CBGSA, it may discourage pumping reductions due to cost. The financing plan developed by the CBGSA would evaluate how to balance the need for funding with encouraging pumpers to commit to compliance with desired groundwater pumping

reduction goals. DRAFT Draft Groundwater Sustainability Plan 8-5 Implementation Plan June 2019

• Assessments: Assessments would charge a fee based on land areas. There are two methods for implementing an assessment based on acreage. The first option would assess a fee for all acres in the Basin outside of those in federal lands. This option would not distinguish between land use types. The second option would be to assess a fee only on irrigated acres. Similar to the pumping fee approach, assessment based on irrigated acreage could affect agricultural operations and contribute to land use conversions, which could affect the assessment amount or ability to fully fund GSP implementation.

• Combination of fees and assessments: This approach would combine pumping fees and assessments to moderate the effects of either approach on the economy in the Basin. This approach would likely include an assessment that would apply to all acres in the Basin, rather than just to irrigated acreage. It would be coupled with a pumping fee to account for those properties that use more water than others.

During development of a financing plan, the CBGSA would also determine whether to apply fees across the Basin as a whole or just within the management areas. The CBGSA may choose to apply an assessment across the Basin and a pumping fee within the management areas, or choose to set different levels of assessments or fees based on location within a management area or not, or they may choose another combination of the above approaches based on location. Prior to implementing any fee or assessment program, the CBGSA would complete a rate assessment study and other analysis consistent with the requirements of Proposition 218."

The "per acre assessment" is DIRECTLY CONTRARY to that vote of the GSA on 7/10/19.

Even more dishonest, the final draft GSP does not anywhere reveal that the Vote, taken on 7/10/19 , of the full GSA, was to fund the GSP **by charging fees based on water extracted**, and **NOT to fund the GSP by charging any per acre fees**.

Your final draft GSP does not even refer to the fact that Vote was taken by the full GSA, and that the Vote was to ONLY charge fees based on water used (aka "water extraction fees"), and was NOT to fund the GSP by charging any per acre fees.

A per acre fee is a **property tax**, which pursuant to the California Constitution, Proposition 218, CANNOT be charged, unless the GSA holds **and wins** a valid proposition 218 election, in which all landowners in the Valley vote. I've briefed the controlling law in my letters sent to GSP before the 7/10/19 meeting of the full GSA. It would cost a lot of money for the GSA to publicize and hold a valid proposition 218 election, and GSA would not be able to win a proposition 218 election, because the number of acres owned by ranchers (like Walking U Ranch, LLC) and other non-farmers, is far greater than the number of acres owned by the big farming operations. You couldn't win a majority vote. And a proposition 218 election requires, as I recollect, that any new property tax be approved by a 2/3rds vote of the property owners.

If CBGSA tries to charge a per acre fee, without holding and winning a valid Proposition 218 election, Walking U Ranch, LLC will sue CBGSA. I said that at the 7/10/19 meeting. GSA and its attorneys would do well to take that to heart, because my husband and I are attorneys, and we know how to sue to

protect the rights of Walking U Ranch, LLC, and the other landowners in the Cuyama Basin who are not OVERUSING water, if necessary.

If Walking U Ranch, LLC has to sue CBGSA to stop illegal acreage based assessments, Walking U Ranch, LLC will be seeking award of Ranch's attorneys fees from having to sue GSA, and Ranch will be entitled to be reimbursed for Ranch's attorneys fees incurred suing GSA. That is because charging a fee ("assessment") based on **acreage owned** is a **property tax**, and it violates the California Constitution to charge a fee ("assessment") based on acreage owned, unless the GSA has held, and won a valid Proposition 218 election.

I note that the above quoted language at 8-4 and 8-5 of "Implementation" of GSP, **fails** to say that GSP cannot assess any charges/fees/assessments based on **acres owned, unless GSA holds and wins a Proposition 218 election**. The above quoted language saying "consistent with the requirements of Proposition 218 " is way too vague. Your GSP should state what the California Constitution requires, which is GSP cannot assess charges based on acres owned, unless GSA holds and wins a valid Proposition 218 election. And explain what that entails.

Sadly, it appears from the final draft plan, that GSA is hoping that no one notices that the GSP, which GSA is now proposing, is DIRECTLY CONTRARY to the Vote, held on 7/10/19, of the full GSA, which was NOT to assess any charges based on acres owned.

Sadly, it appears that whoever got the above "per acre assessment" language put into this final draft plan (the large farming operations, I'm guessing?) are hoping that no one complains it is illegal to charge fees based on acres owned, unless GSA has held and won a valid Proposition 218 election. **Walking U Ranch, LLC hereby complains**. So stop hoping your GSA can get away with illegally assessing fees based on acreage owned, without holding and winning a valid Proposition 218 election, which you can't win. **Fix your GSP, by taking out the above, highlighted in yellow, references to funding your GSP by charging fees based on land area (ie, acres owned). Take that out from section 8. Take it out from the executive summary.**

Bottom line: Delete from your final draft GSP, the text I have highlighted in yellow, above, about "assessments based on land area", and also take out the text about using a combination of such assessments along with pumping fees. Walking U Ranch, LLC requests you make those deletions.

You also need to delete from your executive summary of GSP, all language about charging fees based on on acreage. Here is an example in the executive summary of that improper language, which needs to be deleted:

> "The CBGSA Board of Directors will evaluate options for securing the needed funding. Similar to the funding options for the CBGSA basin-wide activies,
> **options for funding management area costs include fees based on** groundwater pumping**, acreage, or a combinantion of these**, and pursuit of any available grant funds".

Please Reply to me, to kmarch@bkylawfirm.com, Taylor, to confirm receipt, and to confirm you will post this email as the public comment (and Objection to GSP) of Walking U Ranch, LLC, and to confirm you will forward this to all GSA members, and to GSA's lawyer(s).

After your GSA considers Walking U Ranch, LLC's herein Objection to GSP, and request that GSA correct the GSP, please let me know whether or not GSA is going to delete the fees assessed base on acres owned provisions from your GSP. Thank you.

KPMarch

Kathleen P. March, Esq.
The Bankruptcy Law Firm, PC
10524 W. Pico Blvd, Suite 212
Los Angeles, CA 90064
Phone: 310-559-9224
Fax: 310-559-9133
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Taylor Blakslee

From: K. P. March <kmarch@bkylawfirm.com>
Sent: Friday, October 18, 2019 11:51 AM
To: Taylor Blakslee
Cc: Joe Hughes
Subject: RE: To the Cuyama Basin Groundwater Sustainability Agency ("CBGSA") regarding your final draft GSP; From Walking U Ranch, LLC, by Kathleen P. March, Esq., managing member of , LLC; Attn: Talyor Blakslee: Please POST as the Objection and Public Comment

101819

To Taylor Blackslee, administrator for CBGSA; with CC to Joe Hughes, Esq., legal counsel to CBGSA

From Walking U Ranch, LLC, from KPMarch, Esq., Bankruptcy Law Firm, PC

Re: **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** to the Cuyama Basin Groundwater Sustainability Agency ("GSA") final draft Groundwater Sustainability Plan ("GSP")

Taylor:

Thx for confirming receipt of my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP**, that I emailed to you last night, as administrator of CBGSA.

Thx for confirming you will put my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** in the packet to be disseminated to the GSA on November 1, 2019.

But in addition to your forwarding my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** email of last night (10/17/19) to the GSA, I requested, in my email of last night, that my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** be posted as a **public comment**, to bring this problem to the attention of the rest of the landowners in the Cuyama Valley.

Please REPLY to confirm you will post my email of last night as a public comment, and how soon you will do so, and tell me how to check to see that it has been posted as a public comment. Or if you will NOT do so, please tell ME how to post my Walking U Ranch, LLC's OBJECTION and COMMENT to GSP as a public comment, myself. Thx.

Also, I need some information. Is there a GSA meeting on November 1, 2019, and if so what address and what time, and can I address the GSA regarding my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** at that meeting?
Is there a GSA meeting on November 6, 2019, and is it at 6pm at the Cuyama High School, and can I address the GSA regarding my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** at that meeting?

It is disappointing that the final proposed CBGSP is directly contrary to the 7/10/19 vote of the GSA, which (almost unanimous vote) was NOT to charge any fees/assessments to fund the CBGSP, on a land owned basis.

Worse than being disappointing, the final draft GSP is **illegal**, because it says assessments may be charged to fund the GSP, based on **land owned**—and doing so would be charging a **property tax**, which requires holding and winning a valid Proposition 218 election, BEFORE any assement can be made on a **land owned basis**—but the GSA does NOT say that fees based on land owned would only be charged, pursuant to the CBGSP, if GSA holds and wins a valid Proposition 218 election. Omitting that makes the final draft GSP illegal, as contrary to what the California Constitution, Proposition 218, requires to charge assessments based on land owned (aka property tax) basis.

I just finished a 5 week trial, so if Walking U Ranch, LLC needs to sue GSA, for the illegal wording of the final draft plan, at least my law firm is available to do so. However, I suggest it would be better for all concerned, if the illegal wording of the GSP were fixed by GSA, **without Walking U Ranch, LLC having to sue to correct the illegal language**, so I suggest GSA do that.

I am "cc"ing GSA's lawyer, Joe Hughes, Esq., on this email: **Attorney Hughes, please REPLY to me regarding whether this illegal language will be fixed, by GSA, or whether suit is going to be necessary to get it fixed. Thx**

When you REPLY to me, please give me what information you have, as to why the final draft GSP is **directly contrary to the 7/10/19 vote** of the GSA, on the "do not assess fees on land owned basis" point? Thx

Please include this email in what you put in the packet of materials to be given to GSA on November 1, 2019. Please REPLY to confirm you will do so. Thx.

Please post this email as part of posting last night's email (**Walking U Ranch, LLC's OBJECTION and COMMENT to GSP**). Please REPLY to confirm you will do so. Thx.

KPMarch

Kathleen P. March, Esq.
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From: Taylor Blakslee [mailto:TBlakslee@hgcpm.com]
Sent: Thursday, October 17, 2019 9:46 PM
To: K. P. March
Cc: Jim Beck; Joe Hughes
Subject: RE: To the Cuyama Basin Groundwater Sustainability Agency ("CBGSA") regarding your final draft GSP; From Walking U Ranch, LLC, by Kathleen P. March, Esq., managing member of , LLC; Attn: Talyor Blakslee: Please POST as the Objection and Public Comment

Kathleen,

I received your below email dated October 17, 2019 at 7:54 pm and it will be included in our material to the Board that will be distributed on Nov 1, 2019. Additionally, I will forward your comment to the Board ahead of the Nov 1 Board packet mailout.

Thank you for your comments.

Best,

Taylor Blakslee
Project Coordinator

(661) 477-3385

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Taylor Blakslee

From: K. P. March <kmarch@bkylawfirm.com>
Sent: Wednesday, October 23, 2019 1:38 PM
To: Taylor Blakslee
Subject: Taylor Blakslee for CBGSA, from Walking U Ranch, LLC, by KPMarch, Esq., managing member of LLC: Two Questions: It appears there is a meeting at 4pm and a meeting at 6pm, of CBGSA, on Nov 6, 2019. My husband and I plan to come to meeting to address GSA

102319

To Taylor Blakslee for CBGSA, from Walking U Ranch, LLC, by KPMarch, Esq., managing member of LLC: Two Questions:

(1) It appears there is a meeting at 4pm and a meeting at 6pm, of CBGSA, on Nov 6, 2019. My husband and I plan to come to meeting to address GSA about the issues I emailed you Walking U Ranch, LLC's OBJECTION and PUBLIC COMMENT about on 10/17/19 and 10/18/19. What is the correct time for us to come to meeting to address GSA—4pm or 6pm? REPLY and tell me please. Thx. And WHY are there 2 meetings of GSA, one at 4pm and one at 6pm, on the same day?

(2) Regarding the 2019 Groundwater extraction Fee Report, why does it show, at p8, regarding CBGSA FY 2019-20 Budget, under **Legal & Admin**, the Amount of $60,000 labeled as "**Prop 218-Basin-wide**" for months July-Jan? What is the $60,000 actually for? Appears it is for a period (july 2019 to jan 2020) that is soon ending? Yes, am I reading that correctly, or not? **Has that $60,000 been spent, or will it be spent, and FOR WHAT**?

Please REPLY and tell me the Answers. Thx

Also, when last we talked on phone, you said you were going to suggest the ERRORs in the final draft CBGSP that OBJECTED to and COMMENTED on, be fixed. Has that happened? Reply and tell me status please. Thx.

Please include this email, along with my previous emails, in packet you give to GSA for the Nov 6 meeting. Thx

KPMarch

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"Have a former bankruptcy judge for your personal bankruptcy attorney"

TO: Board of Directors
Agenda Item No. 13

FROM: Jim Beck, Executive Director

DATE: November 6, 2019

SUBJECT: Public Hearing – GSP

Issue
Distribution of public comments received to-date.

Recommended Motion
None – information only.

Discussion
The public hearing that concludes the Sustainability Groundwater Management Act (SGMA)-mandated public comment will commence on November 6, 2019 at 6 pm as part of the Cuyama Basin Groundwater Sustainability Agency Board (CBGSA) meeting. Written or verbal comments will be received at the hearing and the Board of Directors can decide if comments require changes to the Groundwater Sustainability Plan.

Provided as Attachment 1 is an overview of the schedule/roadmap and a timeline detailing the steps leading to the submittal of the GSP to the California Department of Water Resources. Attachment 2 includes a summary of commenters, a comment response matrix with staff comments/recommendation on comments received to-date, and the comments that were submitted to the CBGSA.

Cuyama Basin Groundwater Sustainability Agency

Public Hearing - Groundwater Sustainability Plan

November 6, 2019

WOODARD &CURRAN

Final Draft GSP Public Review & Adoption Process

Schedule to Date and Next Steps

- **August 7, 2019:** Board accepts Final Draft GSP and issues Notice of Intent to Adopt
- **August 8, 2019:** 90-day public comment period starts
- **November 1, 2019:** Deadline for written comments to be included in Board packet
- **November 6, 2019:** 90-day public comment period ends
- **November 6, 2019:** Public Hearing to receive comments on Final GSP
- **December 4, 2019:** Board adopts Final GSP
- **January 31, 2020:** CBGSA submits Final GSP to DWR

WOODARD &CURRAN

Final Draft Cuyama Basin GSA GSP Comments

No.	Commenter	Received
1	Central Coast Water Board, Diane Kukol	10/15/2019
2	Walking U Ranch, LLC, Kathleen P. March, Esq.	10/17/2019
3	Kern Ridge Growers, Bob Giragosian	10/29/2019
4	The Nature Conservancy, Sandi Matsumoto	10/31/2019
5	Cuyama Basin Water District, EKI	11/1/2019
6	Cuyama Orchards, Byron Albano	11/1/2019
7	Quail Springs Permaculture, Brenton Kelly	11/1/2019
8	Cuyama Valley Family Resource Center, Lynn Carlisle	11/1/2019
9	Timothy Naughton, Western Cuyama Valley, School House Canyon	11/1/2019

Cuyama Basin Sustainability Section
Summary of Public Comments and Staff Recommendation for Each Comment
November 1, 2019

Attachment #	Commenter	Commenter Organization	Section	Comment	Staff Recommendation	Is a GSP Change Recommended?
1	Diane Kukol for John Robertson	Central Coast Water Board	General	In general, the Central Coast Water Board recommends that the number of chemical constituents included in the Minimum Thresholds (MT), Measurable Objectives (MO), and Interim Milestones (IM) be increased. The Central Coast Water Board agrees that MTs, MOs and IMs should be established for total dissolved solids (TDS), however, including only that single constituent is insufficient for determining whether a groundwater basin is being managed sustainably with respect to water quality or for determining if undesirable results are being addressed. Land use in the Cuyama Valley is dominated by commercial agriculture, an industry that utilizes a variety of chemicals and practices that pose threats to groundwater quality. Therefore, the Central Coast Water Board recommends expanding the list of chemical constituents in the MT, MO, and IM to include nitrate, arsenic, and major dissolved ions. The reasoning for this recommendation is described in detail below.	These comments are unchanged from what was provided on previous drafts of the GSP. The rationale for why monitoring for just TDS in the Basin is provided in the Monitoring chapter. Based on this rationale, direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to include only TDS for monitoring and sustainability in the GSP. Therefore, staff recommends no changes be made to the GSP.	No
1	Diane Kukol for John Robertson	Central Coast Water Board	General	The Central Coast Water Board recommends expanding the list of chemical constituents in the MT, MO, and IM to include nitrate: Nitrate contamination of groundwater from agricultural activities is widely documented in the Central Coast region, including within the Cuyama Valley. Approximately 9% of on-farm domestic wells in the Cuyama Valley exceed the human health standard for nitrate concentration in drinking water1. The draft chapter states that the Cuyama Valley groundwater sustainability agency (GSA) does not have the authority to influence fertilizer use, and we are not suggesting the GSA should undertake such a regulatory role. However, the GSPs are required to implement thresholds and monitoring that can identify when undesirable results are occurring. Given the current impairment from nitrate in the basin and ongoing agricultural activity, it is appropriate to require thresholds and monitoring for nitrate in the Cuyama Valley groundwater basin. Nitrate monitoring is not unusual in agriculturally-dominated basins; for example, the Salinas Valley GSA is recommending an expanded suite of chemical constituents for its thresholds and monitoring. The recommendation in their most recent draft includes up to 25 different chemical constituents, including nitrate and arsenic2. Finally, we recommend that nitrate be reported as nitrogen (nitrate as N), because this convention allows for easy comparison and summation (e.g., calculation of total nitrogen).	These comments are unchanged from what was provided on previous drafts of the GSP. The rationale for why monitoring for just TDS in the Basin is provided in the Monitoring chapter. Based on this rationale, direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to include only TDS for monitoring and sustainability in the GSP. Therefore, staff recommends no changes be made to the GSP.	No
1	Diane Kukol for John Robertson	Central Coast Water Board	General	The Central Coast Water Board recommends expanding the list of chemical constituents in the MT, MO, and IM to include arsenic: Arsenic is a toxic chemical compound that occurs naturally in relatively high concentrations in many of the sediments that form California groundwater basins, including those of the Central Coast. Groundwater data from the Water Board's GeoTracker GAMA3 website indicates that 12% of the wells in the Cuyama Valley groundwater basin exceed the maximum contaminant level (MCL) for arsenic in drinking water. The highest concentration recorded in the basin occurred in 2011 and was more than six times greater than the MCL. Furthermore, recent studies in the Central Valley of California4 and the Mekong Delta in Thailand5 have demonstrated that ground subsidence associated with groundwater over-pumping can mobilize arsenic by 'squeezing' it out of subsurface clay layers. The resulting mobilized arsenic can then enter groundwater and increase arsenic concentrations in nearby water supply wells. Because there is documented overdraft and subsidence in the Cuyama Valley, there is the potential risk of anthropogenically-induced arsenic contamination of groundwater due to arsenic mobilization from clay layers in the Cuyama Valley basin. Lastly, in addition to sediment-related sources, arsenic is a component in many pesticides commonly used on various crops. These factors suggest that arsenic should be included in the MTs, MOs, and IMs for the Cuyama Valley basin.	These comments are unchanged from what was provided on previous drafts of the GSP. The rationale for why monitoring for just TDS in the Basin is provided in the Monitoring chapter. Based on this rationale, direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to include only TDS for monitoring and sustainability in the GSP. Therefore, staff recommends no changes be made to the GSP.	No
1	Diane Kukol for John Robertson	Central Coast Water Board	General	The Central Coast Water Board recommends expanding the list of chemical constituents in the MT, MO, and IM to include major dissolved ions: Major dissolved cation and anion composition in groundwater reflects the source of recharge water, lithological and hydrological properties of the aquifer, groundwater residence time, and chemical processes within the aquifer. As such, major dissolved ions are valuable for identifying different groundwater types (via Piper or Stiff diagrams) and for "fingerprinting" source water from individual wells. In addition, ionic charge balance provides quality assurance that all the major ions are actually included in the analysis and that TDS concentrations are accurate. Finally, collection and analysis of major dissolved ion samples is easy and inexpensive, and the cost of the analysis is well worth the data provided, particularly if the well is already being sampled for other constituents.	These comments are unchanged from what was provided on previous drafts of the GSP. The rationale for why monitoring for just TDS in the Basin is provided in the Monitoring chapter. Based on this rationale, direction was provided by the GSA Board (through approval of the Monitoring Networks GSP section) to include only TDS for monitoring and sustainability in the GSP. Therefore, staff recommends no changes be made to the GSP.	No
2	Kathleen Marsh	Walking U Ranch, LLC	General	I write as managing member of Walking U Ranch, LLC, which owns and runs a 1000 acre cattle ranch located in the west end of the cuyama valley, 33 miles east of Santa Maria, CA. Walking U Ranch, LLC objects to the GSP. The proposed funding for the GSP is directly CONTRARY to what the vote was, taken on 7/10/19, of the full Cuyama Basin GSA, on how to fund the Cuyama Basin GSP. My husband and I (yes we are both lawyers) were present, and I spoke to GSA. In addition, I had briefed the controlling law, by letters to the GSA, before the 7/10/19 meeting. The vote of the full CBGSA, on 7/10/19, which was practically unanimous, was to fund the Cuyama Basin GSP by charging fees based on water extracted, and NOT to fund the GSP by charging any per acre fees. Directly contrary to that vote of the full GSA, the "final proposed draft" GSP, at Section 8 (Implementation) at pages 8-4 to 8-5, and in the executive summary, says the GSP may be funded by charging extraction fees, or by charging per acre assessments, or by a combination of both means. The "per acre assessment" is DIRECTLY CONTRARY to that vote of the GSA on 7/10/19. Even more dishonest, the final draft GSP does not anywhere reveal that the Vote, taken on 7/10/19 , of the full GSA, was to fund the GSP by charging fees based on water extracted, and NOT to fund the GSP by charging any per acre fees. Your final draft GSP does not even refer to the fact that Vote was taken by the full GSA, and that the Vote was to ONLY charge fees based on water used (aka "water extraction fees"), and was NOT to fund the GSP by charging any per acre fees. A per acre fee is a property tax, which pursuant to the California Constitution, Proposition 218, CANNOT be charged, unless the GSA holds and wins a valid proposition 218 election, in which all landowners in the Valley vote. I've briefed the controlling law in my letters sent to GSP before the 7/10/19 meeting of the full GSA. It would cost a lot of money for the GSA to publicize and hold a valid proposition 218 election, and GSA would not be able to win a proposition 218 election, because the number of acres owned by ranchers (like Walking U Ranch, LLC) and other non-farmers, is far greater than the number of acres owned by the big farming operations. You couldn't win a majority vote. And a proposition 218 election requires, as I recollect, that any new property tax be approved by a 2/3rds vote of the property owners. If CBGSA tries to charge a per acre fee, without holding and winning a valid Proposition 218 election, Walking U Ranch, LLC will sue CBGSA. I said that at the 7/10/19 meeting. GSA and its attorneys would do well to take that to heart, because my husband and I are attorneys, and we know how to sue to protect the rights of Walking U Ranch, LLC, and the other landowners in the Cuyama Basin who are not OVERUSING water, if necessary. If Walking U Ranch, LLC has to sue CBGSA to stop illegal acreage based assessments, Walking U Ranch, LLC will be seeking award of Ranch's attorneys fees from having to sue GSA, and Ranch will be entitled to be reimbursed for Ranch's attorneys fees incurred suing GSA. That is because charging a fee ("assessment") based on acreage owned is a property tax, and it violates the California Constitution to charge a fee ("assessment") based on acreage owned, unless the GSA has held, and won a valid Proposition 218 election. I note that the above quoted language at 8-4 and 8-5 of "Implementation" of GSP, fails to say that GSP cannot assess any charges/fees/assessments based on acres owned, unless GSA holds and wins a Proposition 218 election. The above quoted language saying "consistent with the requirements of Proposition 218 " is way too vague. Your GSP should state what the California Constitution requires, which is GSP cannot assess charges based on acres owned, unless GSA holds and wins a valid Proposition 218 election. And explain what that entails. Sadly, it appears from the final draft plan, that GSA is hoping that no one notices that the GSP, which GSA is now proposing, is DIRECTLY CONTRARY to the Vote, held on 7/10/19, of the full GSA, which was NOT to assess any charges based on acres owned. Sadly, it appears that whoever got the above "per acre assessment" language put into this final draft plan (the large farming operations, I'm guessing?) are hoping that no one complains it is illegal to charge fees based on acres owned, unless GSA has held and won a valid Proposition 218 election. Walking U Ranch, LLC hereby complains. So stop hoping your GSA can get away with illegally assessing fees based on acreage owned, without holding and winning a valid Proposition 218 election, which you can't win. Fix your GSP, by taking out the above, highlighted in yellow, references to funding your GSP by charging fees based on land area (ie, acres owned). Take that out from section 8. Take it out from the executive summary.	As noted in the comment, the Board voted on July 10 to develop a groundwater extraction fee to provide funding during the first year. Staff recommends adding a sentence to the GSP noting that the direction provided by the Board.	Yes
3	Bob Giragosian	Kern River Growers, LLC	General	See the comment letter for the full comment. The introduction and concluding paragraphs are copied here: The farmers in the Cuyama Water Basin are being accused of causing an overdraft situation with the water table. The water table has been falling and therefore it must be the farmers who are causing the problem. Afterall, the farmers in the Cuyama Water Basin pump in excess of 100,000 gallons per minute of water during the peak pumping season; therefore, farmers must be the problem and if we just reduce the amount of farming the problem will be fixed. Clearly, there are lots of other farming areas where the farmers also pump thousands of gallons per minute the same as we do. In many of those areas there is not an overdraft situation; such as the southern part of the Cuyama Water Basi n, as well as many areas inNorthern California and farming regions all over the United States. Why is it that the farmers can pump as much as they want in these other areas without affecting the water table in their area? ... I have enclosed well reports on several of the wells in the Cuyama Valley which tend to indicate that the water table is going up and down over time which is what you would expect if the water table is not a function of the pumping level. If p umping ground water caused the water table to drop, then the table would continually be falling as we pumped out water to farm. The more we pump the further down the table would go. We would be lowering our bowls yearly to stay with t he new water level. But in reality, when looking at well records during the last 10 years, we see that the water table goes up and down almost at random, clearly illustrating that pumping water for farming is not causing the water table to cha nge. In conclusion, I believe that following our farming model of fallowing 50% of our irrigated acreage will lead to sustainable ground over time consistent with the well data that I have enclosed along with my comments. I do not think that a chang e in pumping level is necessary or appropriate for ground water sustainability in the Cuyama Valley. I further believe that the well monitoring that has been attached to these comments is consistent with my conclusions.	This comment is similar to comments provided on previous drafts of the GSP. The water budget and groundwater levels information described in this document do not match the technical information developed for and described in the GSP. Staff recommends no change to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	1.3.1	Environmental users of groundwater, including groundwater dependent ecosystems (GDEs), are acknowledged as beneficial users of groundwater in the GSP. Other species that depend on interconnected surface waters exist in Cuyama Basin and therefore should be identified and described. For any species that are no longer present in the basin, please provide scientific rationale and data to support this claim.	This comment is similar to comments provided on previous drafts of the GSP. The GSP was previously updated to note that environmental users of groundwater, including GDEs are beneficial users of water. Staff recommends no further changes to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	2.1.6	It is currently unclear how existing well depths compare with the depth of the upper member of the Morales Formation. According to DWR's Hydrogeologic Conceptual Model BMP3, "the definable bottom of the basin should be at least as deep as the deepest groundwater extractions". Thus, groundwater extraction well depth data should also be included in the determination of the basin bottom. This will prevent the possibility of extractors with wells deeper than the basin boundary from claiming exemption of SGMA due to their well residing outside the vertical extent of the basin boundary.	This comment is similar to comments provided on previous drafts of the GSP. Data was not available to perform these analyses in advance of the GSP. Additional detail can potentially be added as additional data is collected in the future. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	2.1.7	In paragraph 1, "The aquifer is considered to be continuous and unconfined with the exception of locally perched aquifers resulting from clays in the formation". Please provide more details on: • the location of perched aquifers • whether perched aquifers are being used by domestic shallow wells, GDEs and/or are potentially interacting with surface water • the vertical gradients between the perched aquifers and the recent and younger alluvium aquifers • other aquifer characteristics that may be known (e.g., perched aquifer thickness, porosity, hydraulic conductivity)	This comment is similar to comments provided on previous drafts of the GSP. Additional detail can potentially be added in future versions of the GSP as additional data is collected in the future. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	2.2.8	The model results are demonstrating that the entire river is an interconnected surface water system ("surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted" 23 CCR §351(o)). Based on the annual average stream depletion by reach (Table 2-2), it appears that losing and gaining reaches of the Cuyama can be mapped. Please distinguish the gaining and losing reaches. The data provides seems to indicate: o Gaining: Reach 1, Reach 3, Reach 6, Reach 8, Reach 9. o Losing: Reach 2, Reach 4, Reach 5, Reach 7	This comment is similar to comments provided on previous drafts of the GSP. Data was not available to perform these analyses in advance of the GSP. Additional detail can potentially be added as additional data is collected in the future. Therefore, staff recommends no changes be made to the GSP.	No

Cuyama Basin Sustainability Section
Summary of Public Comments and Staff Recommendation for Each Comment
November 1, 2019

Attachment #	Commenter	Commenter Organization	Section	Comment	Staff Recommendation	Is a GSP Change Recommended?
4	Sandi Matsumoto	The Nature Conservancy	2.2.9	SGMA requires that all beneficial uses and users, including GDEs, be considered in the development and implementation of GSPs (Water Code §10723.2). The GSP Regulations include specific requirements to identify (map) GDEs and consider them when determining whether groundwater conditions are having potential effects on beneficial uses and users. SGMA also requires an assessment of whether sustainable management criteria (including minimum thresholds and measurable objectives) may cause adverse impacts to beneficial uses, including GDEs, and that monitoring networks are designed to detect such impacts. Therefore, mapping GDEs is a critical first step for incorporating environmental considerations into GSPs. • It appears that the preliminary desktop analysis, completed by Woodard & Curran and documented in Appendix D of the draft GSP, resulted an excessive elimination – totaling two-thirds – of the NC dataset polygons mapped in the Cuyama Basin. In particular, the methods and field verification approach described in the draft GSP failed take groundwater levels into consideration. SGMA defines GDEs as "ecological communities and species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface". We recommend that depth to groundwater contour maps are used to verify whether a connection to groundwater exists for polygons in the NC Dataset. Please refer to Appendix D of this letter for best practices for using groundwater data to verify a connection to groundwater.	This comment is similar to comments provided on previous drafts of the GSP. The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	Appendix D	More specific comments related to the desktop analysis approach (as described in Appendix D of the GSP) include: • Inundation visible on aerial imagery – This method is inappropriate because it is not possible to know whether surface water is connected with groundwater by visually inspecting it with aerial imagery. For example, in some cases surface water can be completely disconnected from groundwater, so in this scenario this approach would falsely suggest that NC dataset polygons are connected to groundwater. Similarly, if surface water is not present, this method would also falsely suggest that NC dataset polygons are not connected to groundwater if plant communities and the species they support are accessing groundwater beneath the surface. This method also fails to account for the fact that GDEs can rely on groundwater for some or all its water requirements, which in California often vary by season, and depend on the availability of alternative water sources (e.g., precipitation, river water, reservoir water, soil moisture in the vadose zone, groundwater, applied water, treated wastewater effluent, urban stormwater, irrigated return flow). olf aerial imagery is to be used, a range of dates should be selected to reflect the California's Mediterranean climate, seasonal variations and water year types. oPhreatophytes (groundwater-dependent vegetation) often rely on groundwater that is occurring near the ground surface via their rooting network. Because these sources of groundwater are not detectable using aerial imagery, the images should be compared with contoured groundwater levels to determine whether groundwater levels are close enough to vegetation root zones. oWe suggest the methods be revised and clarified accordingly. • Saturation visible on aerial imagery could indicate many different conditions, including standing water or saturated soils that may be ephemeral, intermittent, or permanent in nature. To help verify what the images actually indicate, this method should be coupled with more advanced remote sensing methods. Please clarify if this was the case. • Dense riparian and/or wetland vegetation visible on aerial imagery can help identify potential GDEs but is not an appropriate method to screen for whether a polygon is supported by groundwater and in fact a GDE. The presence of sparse vegetation also does not preclude the possibility that vegetation are using groundwater. Many desert and semi-arid environments with sparse vegetation can still be groundwater dependent ecosystems.	This comment is similar to comments provided on previous drafts of the GSP. The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	Appendix D	More specific comments related to the GDE field validation approach (as described in Appendix D of the draft GSP): • The removal of Probable Non-GDE 1 and Probable Non-GDE 2 was based on the presence of sandy, dry, and friable soils was not scientifically justified. The presence of this soil type does not preclude the possibility that the dominant plant species observed are reliant on groundwater at depths below the earth surface. For example, a rooting depth of 13 feet has been observed for Ericameria nauseosa and >4 feet for Eriogonum fasiculatum, and the capillary fringe associated with those rooting networks could be accessing groundwater from deeper depths, depending on the hydraulic conductivity of the substratum. For more rooting depth data, please refer to TNC's global rooting depth database, available at: https://groundwaterresourcehub.org/gde-tools/gde-rooting-depths-database-for- gdes/	This comment is similar to comments provided on previous drafts of the GSP. The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs can potentially be added in the future at the direction of the CBGSA Board. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	Figure 2-64	[Checklist items #8 & 9]: Decisions to remove, keep, or add polygons from the NC dataset into a basin GDE map should be based on best available science in a manner that promotes transparency and accountability with stakeholders. Any polygons that are removed, added, or kept should be inventoried in the submitted shapefile to DWR, and mapped in the plan. We recommend revising Figure 2-64 to reflect these requirements.	This comment is similar to comments provided on previous drafts of the GSP. The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	Chapter 2	[Checklist item #10]: Groundwater conditions within GDEs should be briefly described within the portion of the Basin Setting Section where GDEs are being identified. Please refer to Attachment E of this letter for details on a new, free online tool that enables groundwater sustainability agencies to assess historical and current trends of growth and moisture content in vegetation using 35 years of satellite imagery for all of the polygons in the NC dataset.	This comment is similar to comments provided on previous drafts of the GSP. The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	Chapter 2	[Checklist item #16]: Not all GDEs are created equal. Some GDEs may contain legally protected species or ecologically rich communities, whereas other GDEs may be highly degraded with little conservation value. Including a description of the types of species (protected status, native versus non-native), habitat, and environmental beneficial uses (see Worksheet 2, p.74 of GDE Guidance Document) can be helpful in assigning an ecological value to the GDEs. Identifying an ecological value of each GDE can help prioritize limited resources when considering GDEs as well as prioritizing legally protected species or habitat that may need special consideration when setting sustainable management criteria.	This comment is similar to comments provided on previous drafts of the GSP. The analysis and discussion of GDEs in the GSP was developed to satisfy SGMA requirements as they relate to GDEs. The GSP recommends piezometers to monitor for groundwater levels in the vicinity of critical GDEs. Additional analysis of GDEs and actions for GDEs and other environmental benefits can potentially be added in the future at the direction of the CBGSA Board. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	3.2.1 and 3.3.1	Significant adverse impacts to GDEs can occur if 30% of representative monitoring wells fall below their minimum groundwater elevation thresholds for two consecutive years. The proposed approach could work if management areas were established to "identify different minimum thresholds, measurable objectives, monitoring, or projects and management actions based on differences in water use sector, water source type, geology, aquifer characteristics, or other factors" [23 CCR §351(r)]. But, as it is written now, significant and unreasonable adverse impacts to GDEs could occur if the exceedance of minimum thresholds disproportionately occurs in representative monitoring wells close to GDEs (e.g., 3 out of the 60 wells minimum thresholds are exceeded for 3 years are causing adverse impacts to GDEs, but because the definition of undesirable results (18 out of 60 wells) is not met, there is no formal recognition that undesirable results are occurring). We recommend that groundwater levels that are protective of GDEs be considered when establishing minimum thresholds for groundwater levels across the basin. Please refer to Step 2 of GDEs under SGMA: Guidance for Preparing GSPs1 for more details.	This comment is similar to comments provided on previous drafts of the GSP. The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	3.2.6	Under the Potential Effects of Undesirable Results subsection, "If depletions of interconnected surface water were to reach Undesirable Results, groundwater dependent ecosystems could be affected" should also include potential effects on environmental surface water users, land uses (e.g., fishing/hunting, hiking, boating), and property interests (e.g., privately and publicly protected conservation lands and open spaces, including wildlife refuges, parks, and natural preserves) [23 CCR §354.26(b)(3)]. Please also provide more details on how these various beneficial users could be adversely affected. SGMA also requires that depletions of interconnected surface water also consider adverse impacts on beneficial uses of surface water [23 CCR 354.28(6)].	This comment is similar to comments provided on previous drafts of the GSP. The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board using the information that is currently available. They can be revised in the future if additional information is developed. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	3.2.6	In addition to identifying GDEs in the basin, The Nature Conservancy recommends identifying beneficial users of surface water, which include environmental users. This is a critical step, as it is impossible to define "significant and unreasonable adverse impacts" without knowing what is being impacted, nor is possible to monitor ISWs in a way that can "identify adverse impacts on beneficial uses of surface water" [23 CCR §354.34(c)(6)(D)]. For your convenience, we've provided a list of freshwater species within the boundary of the Cuyama Basin in Attachment C. Our hope is that this information will help your GSA better evaluate and monitor the impacts of groundwater management on environmental beneficial users of surface water. We recommend that after identifying which freshwater species exist in your basin, especially federal and state listed species, that you contact staff at the Department of Fish and Wildlife (DFW), United States Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Services (NMFS) to obtain their input on the groundwater and surface water needs of the organisms on the freshwater species list, and how best to monitor them. Because effects to plants and animals are difficult and sometimes impossible to reverse, we recommend erring on the side of caution to preserve sufficient groundwater conditions to sustain GDEs and ISWs.	This comment is similar to comments provided on previous drafts of the GSP. The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board using the information that is currently available. They can be revised in the future if additional information is developed. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	3.2.6	Please also provide more details on when, where, and how groundwater changes can adversely affect these various beneficial users. Are there particular species, with legal protection, that already have known thresholds that need special consideration? The more specific the definition of what an adverse impact to beneficial users of groundwater and surface water looks like, the easier it is to quantify minimum thresholds, measurable objectives, and interim milestones that are protective of that definition.	This comment is similar to comments provided on previous drafts of the GSP. The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board using the information that is currently available. They can be revised in the future if additional information is developed. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	3.3.6	• Please be more specific on what measurements were used to show that groundwater gradients along interconnected surface water bodies in the Cuyama basin are not in an undesirable condition. How were these gradients determined?	This comment is similar to comments provided on previous drafts of the GSP. The current definition reflects the best understanding given currently available data. The undesirable results definitions for depletion of interconnected surface can be updated when better data is available. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	3.3.6	• Analysis of Interconnected Surface Waters in Section 2.2.8, particularly Table 2.2, demonstrate that depletions of interconnected surface water are occurring, meaning that adverse impacts to beneficial uses and users could be occurring. Thus, it is inadequate to state that "depletion of interconnected surface water is not identified to be in an undesirable condition" without evaluating potential effects to beneficial users.	This comment is similar to comments provided on previous drafts of the GSP. The chapter reflects undesirable results as defined by minimum threshold levels approved for each sustainability indicator by the GSA Board using the information that is currently available. They can be revised in the future if additional information is developed. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	4.5.4	Please identify which representative monitoring wells are capable of monitoring groundwater level conditions that can impact environmental beneficial users of groundwater (i.e., GDEs) and of surface water (e.g., freshwater aquatic species). Refer to Best Practice #4 in Attachment D to this letter for technical guidance.	This comment is similar to comments provided on previous drafts of the GSP. This can be considered during GSP implementation. Therefore, staff recommends no changes be made to the GSP.	No

Cuyama Basin Sustainability Section
Summary of Public Comments and Staff Recommendation for Each Comment
November 1, 2019

Attachment #	Commenter	Commenter Organization	Section	Comment	Staff Recommendation	Is a GSP Change Recommended?
4	Sandi Matsumoto	The Nature Conservancy	4.10	The improvement of numerical model accuracy for the estimation of interconnected surface waters should also include the installation of clustered or nested wells and the installation of shallow monitoring wells around GDEs and the Cuyama River to resolve data gaps that were identified in Section 2.2.10: oThe Cuyama River is not gaged inside the Cuyama Basin, so flows of the river in the Basin have been estimated based on measurements at downstream gages. oVertical gradients in the majority of the Basin are not understood due to the lack of wells with completions of different depths located near each other. oGDEs could be evaluated in greater detail oInformation about many of the wells in the Basin is incomplete, and additional information is needed regarding well depths, perforation intervals and current status. oDue to sporadic monitoring by a variety of monitoring entities, a long period of record of monitoring groundwater levels does not exist in many areas in the Basin.	This comment is similar to comments provided on previous drafts of the GSP. Additional information will be developed as the monitoring network is developed during GSP implementation. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	4.10	Please identify appropriate biological indicators that can be used to monitor potential impacts to environmental beneficial users due to groundwater conditions. Refer to Appendix E of this letter for an overview of a free, new online tool for monitoring the health of GDEs over time.	This comment is similar to comments provided on previous drafts of the GSP. This can be considered during GSP implementation. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	5.2.2	· Selecting thresholds by using groundwater elevation measurements closest to (but not before) January 1, 2015 is inadequate for identifying minimum thresholds or measurable objectives. Relying solely on the SGMA benchmark date (January 1, 2015) or any other single point in time to characterize groundwater conditions fails to capture the seasonal and interannual variability typical of California's climate. Hydrology is not static. Measurable objectives are intended to be set with enough operational flexibility to permit seasonal and interannual fluctuations that occur in California. We recommend that you consider using a baseline approach to better capture seasonality and water year types.	This comment is similar to comments provided on previous drafts of the GSP. Using January 1, 2015 as a reference point is acceptable for development of the GSP MOs and IMs. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	5.2.2	• January 1, 2015 was at the height of California's historic drought, a period of time that was characterized by adverse impacts to domestic well owners (e.g., dry wells), GDEs (e.g., water stress impacts on growth, reproduction, and even mortality due to lack of groundwater), and surface water users (e.g., lower streamflows). The onus is on the GSAs to determine whether groundwater conditions (due to groundwater pumping) exacerbated impacts to these beneficial users. And if so, to recognize these impacts and establish thresholds and measurable objectives that can avoid adverse impacts to beneficial users caused by groundwater in all water year types.	This comment is similar to comments provided on previous drafts of the GSP. Using January 1, 2015 as a reference point is acceptable for development of the GSP MOs and IMs. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	5.2.2	· While total well depth information is helpful in considering adverse impacts to beneficial users of groundwater (e.g., domestic, irrigation, and municipal wells), it fails to consider adverse impacts to GDEs and environmental beneficial users of surface water in interconnected surface waters. Environmental beneficial users of groundwater need to be considered when establishing measurable thresholds, measurable objectives, and interim milestones. Please refer to Step 2 of GDEs under SGMA: Guidance for Preparing GSPs1 for how this can be accomplished.	This comment is similar to comments provided on previous drafts of the GSP. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	5.2.2	· Please describe any differences between the selected minimum threshold and state, federal, or local standards relevant to the species or habitats residing in GDEs, as required [23 CCR §354.28 (b)(5)].	This comment is similar to comments provided on previous drafts of the GSP. No differences have been identified. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	5.7	· It is highly doubtful that January 1, 2015 surface water conditions can be considered "normal" (2nd sentence in 2nd paragraph), please provide data to back this claim. January 1, 2015 was at the height of California's historic drought, a period of time that was characterized by adverse impacts to domestic well owners (e.g., dry wells), GDEs (e.g., water stress impacts on growth, reproduction, and even mortality due to lack of groundwater), and surface water users (e.g., lower streamflows).	This comment is similar to comments provided on previous drafts of the GSP. Using January 1, 2015 as a reference point is acceptable for development of the GSP MOs and IMs. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	5.7	· Please provide more data and an elaborated description on how current basin conditions have not varied from January 1, 2015 conditions.	This comment is similar to comments provided on previous drafts of the GSP. This can potentially be added as more data is available in the future. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	5.7	· Even if current basin conditions may not have varied from January 1, 2015, the onus is on the GSAs to determine whether groundwater conditions are causing any adverse impacts to beneficial users. And if so, to recognize these impacts and establish thresholds and measurable objectives that can avoid adverse impacts to beneficial users caused by groundwater in all water year types.	This comment is similar to comments provided on previous drafts of the GSP. This will be performed through monitoring during GSP implementation. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	5.7	• According to Table 2-2 in the Draft GSP, 5994 AF of surface water was depleted in 2017. Please investigate whether these depletions in surface water are adversely impacting instream flow conditions and groundwater levels in riparian areas for environmental beneficial users, especially legally protected species.	This comment is similar to comments provided on previous drafts of the GSP. Data does not currently exist to assess this, but it could potentially be assessed in the future. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	5.7	• Please describe any differences between the selected minimum threshold and state, federal, or local standards relevant to the species or habitats residing in GDEs or aquatic ecosystems dependent on interconnected surface waters [23 CCR §354.28 (b)(5)].	This comment is similar to comments provided on previous drafts of the GSP. Data does not currently exist to assess this, but it could potentially be assessed in the future. Therefore, staff recommends no changes be made to the GSP.	No
4	Sandi Matsumoto	The Nature Conservancy	7	•Please describe how the projects described in this chapter and their benefits will help "maintain a viable groundwater resource for the beneficial use of people and the environment" as stated in the sustainability goal for the Cuyama Basin.	This comment is similar to comments provided on previous drafts of the GSP. This is reflected in the project descriptions. Therefore, staff recommends no changes be made to the GSP.	No
5	Jeff Shaw, John L. Fio, and David A. Leighton	EKI Environment & Water, Inc.	General	The following is the summary of comments provided in the comment letter. Please refer to the comment letter for additional details on these comments: 1. Projected future drawdown contours (and thus Management Area boundaries) published in the GSP are not reproducible using the model files and procedures provided by WC. 2. The model requires additional review and potential modification before it can be used by basin stakeholders as a groundwater management tool. 3. Long-term decisions such as the extent of areas where groundwater pumping is restricted should not be based solely on model output in its current form. 4. Management Area boundaries are delineated based on estimates of land use and pumping rates. Thus, they incorporate any errors and uncertainty in these parameters. For example, an error in estimated pumping of 1,000 AF can change the area within Management Areas by 600 to 800 acres. 5. The most sensitive model parameter in terms of its effect on estimated groundwater storage is groundwater pumping, which is not well-defined currently, and is not explicitly modeled in the Basin. Groundwater is assumed in the model to be extracted evenly from beneath the land over which it is used for irrigation. Simulation of pumping wells in their actual locations likely would improve model performance. 6. The model was calibrated without an explicitly-modeled vadose zone, which would influence model calibration and as a result alter model-calculated changes in water levels and groundwater storage.		
6	Byron Albano	Cuyama Orchards	General	It will come as no surprise to my fellow community members in the Cuyama Valley, that I have serious reservations about the Cuyama Basin Groundwater Sustainability Plan that is proposed for passage. I think most members of the Cuyama Valley community share this sentiment, if not my same reservations. After millions of dollars spent, the Cuyama GSP doesn't address what I consider to be the most significant question for the residents and property owners in the valley: How will we arrest the historical over-pumping of the main sub-basin in a way that isn't excessively punitive to owners of the properties that caused the overdraft, and that is fair to the rest of the residents, farmers, ranchers, businesses, and property owners in the valley who use, and have used, water in a way that was, and is, sustainable. It's not going to be easy, we all know that. But it strikes me that this plan doesn't even start to address that question. To the contrary. The plan starts by spreading the costs of the plan to all water users in the valley regardless of the historical sustainability of that user's water supply, and without consideration of that user's conservation efforts, or their rights to continue to use water in a reasonable and sustainable way. I've resisted the temptation to condemn any particular farming operations for their activities in the main sub-basin, who have only operated within the bounds of their historical rights under California water law, but we are going to have to talk about and address these issues. There are quite a few sustainable farms and operations throughout the Valley in terms of water usage. In fact, most of them are, simply because physically they've had no choice but to live within their means when it came to water and land availability. But this hasn't been the case in the main sub-basin. Some operations lived beyond their means when it came to a sustainable water supply. They chose to tap that supply for what it was worth, for as long as they were allowed. And it has been worth a lot. As the main aquifer was drafted down over the decades, those with the deepest wells and the deepest pockets were able to buy cheaper contiguous parcels that either didn't have access to water, or whose wells were losing out in the competition for deeper water. It has been clear for decades that this ultimately wasn't a sustainable practice. But neither was it illegal, and so those "deep straws" were used to access water that, in that region of the valley, could be piped over great distances to irrigate an expanse of land regardless of the parcel's access to water. This scenario was never really possible in most of the rest of the valley due to the highly variable topography, which limits the arable land, and fragmented hydrology that creates mostly highly localized availability of water. SGMA now forces a cessation of the long-term overdraft that has occurred in the main sub-basin. The question is worth repeating: How will we arrest the historical over-pumping of the main sub-basin in a way that isn't excessively punitive to owners of the properties that caused the overdraft, and that is fair to the rest of the residents, farmers, ranchers, businesses, and property owners in the valley who use, and have used, water in a way that was, and is, sustainable. I'd like to see a plan that focuses on addressing those issues so that the sustainable farming operations of the Cuyama Valley could start to imagine our future once more. Instead, we are getting a plan that opens up a growing, bottomless pit of spending that threatens us all. We have been led by our consultants, and by those operations with the deepest straws and deepest pockets, to buy into the idea that we just don't have enough data to make these decisions until we spend untold additional millions that our operations can ill afford. I don't think it was the purpose of SGMA to force smaller, often undercapitalized, farming operations, like my own, to pay the price for the ungoverned externalities of large, highly capitalized operations that have been the principal drivers of the drawdown of our largest aquifer. SGMA has given us the tools and local decision making, precisely so that we can sort out these difficult issues. I believe we do have enough data and a clear enough understanding of the issues to start working this out while we test and improve our water model over time. In the interim, we need to be exceptionally judicious with our spending to fill the data gaps that actually bear on the pumping allocations and cost allocations on which we need to reach consensus in order to implement a successful GSP. I feel very strongly along with nearly everyone in this valley, that this should not, and cannot, require spending a million-plus dollars per year while we work that out.		
7	Brenton Kelly	Quail Springs Permaculture	General	Management Area Agreements I have not seen this agreement yet but I have several concerns. The very first is fiscal. Why does Cuyama need two $1 Million public water agencies? Cuyama cannot afford to pay for two agencies to consult each other's consultants and arm-wrestling with public policy. This kind of jurisdictional redundancy is not called for in SGMA. Can the CBWD shrink in relation to the size of the Management Area? Manage for it's inevitable irrelevance.		
7	Brenton Kelly	Quail Springs Permaculture	General	Extraction Fee Report This is a start. This will pay the first bills. But this will not do for long. This is the hottest topic in the Plan and remains problematic. My main concerns are these: - No Incentives or penalties to encourage compliance. - No recognition that the problem is located only in the central region. - No tier structure or recognition of areas with historically balanced water use. - No recognition or discouragement of wasteful & unreasonable water use. - No ability to adapt to and limit new water users and water use.		

Cuyama Basin Sustainability Section
Summary of Public Comments and Staff Recommendation for Each Comment
November 1, 2019

Attachment #	Commenter	Commenter Organization	Section	Comment	Staff Recommendation	Is a GSP Change Recommended?
7	Brenton Kelly	Quail Springs Permaculture	Executive Summary	This Summary paints a fairly pretty picture of a decidedly concerning scene. Cuyama pumps 60 TAF in a Basin with only 20 TAF sustainable yield. With a problem of this magnitude, to underrepresent in this way is like putting lipstick on the backside of the pig. The Groundwater Quality section was greatly reduced from the Public draft, with no reference now to the high concentrations of other constituents. There is no justification for only monitoring for TDS in a Basin full of Arsenic, Boron & Nitrates. The Public Draft version presented the Existing Conditions accurately and compellingly. A resource cannot be managed if it is not well monitored. Why not monitor for more constituents without having to set any Minimum Thresholds? We need the information to understand and Model the basin Hydrology. Figure ES-4: This Depth-to-Groundwater image shows a frightening cone of depression over 600 feet deep. That target pattern should be used to help distribute the Extraction Fee more equitably. It clearly shows where the problem spot is! There is no mention of the major Data Gaps in the Monitoring Network or the heavy lifting required to fill them, or the effect those data Gaps have on the uncertainty of the Model. Or that this Model uncertainty was then used to plot the Management Area in Fig. E-14. Fig. E-14 is mislabeled in the text as E-15 and undervalues the extent of the projected draw down. The Red area is greater than 5' and up to 7.7 feet, not just 4. Why doesn't this image more closely match Fig.ES-4?		
7	Brenton Kelly	Quail Springs Permaculture	Chapter 2	This is all review of old publications, including the most recent USGS Study, which suggested further work was needed to understand the permeability of the faults. None of that work has been done. The Data Gaps are profound for all Sustainability Indicators. This Plan does not seem to include the Hydro-geological staff & investigation needed to answer the many unknowns of the Basin.		
7	Brenton Kelly	Quail Springs Permaculture	Chapter 3	This Chapter has been problematic from the start. The data clearly indicates that 50 years of chronic overdraft has caused a historic Groundwater Storage loss of over 1,000,000 AF, <400' of Groundwater Elevation declines, subsidence rates of approximately 0.8 inches per year, the total loss of the Cuyama River surface water annual base flow, and the desertification of the many GDEs across the basin. How can this plan not recognize existing, chronic & persistent Undesirable Results today if not already happening on Jan 1, 2015? The Cuyama Basin has been experiencing Undesirable Results for decades. Certainly conditions should not be allowed to get worse than they were in 2015, but many Sustainability Indicators allow for conditions to continue to worsen, very much like they currently are doing. The latest reading is the historic low in the central basin. An acceptable and realistic solution to Cuyama's Groundwater would not start with a complete denial of the actual conditions on the ground after the acknowledged historic out of balance land use. To accept the proposed slow 20 year glide path from current chronic overdraft is to never see a return to 2015 conditions much less to ever see wetlands return to the riverbeds.		
7	Brenton Kelly	Quail Springs Permaculture	Chapter 4	Groundwater Quality: It is still unacceptable to this stakeholder that the GSA will not monitor for any other major constituents than TDS. Arsenic, Boron and Nitrates are of concern to domestic wells in the basin. This is an undesirable condition that this Plan cannot disregard. This is unacceptable in the light of California's recognition of a humane right to safe drinking water.		
7	Brenton Kelly	Quail Springs Permaculture	Chapter 4	Data Gaps: With unknown fault permeability, no stream gauges, no subsidence monitor in the cone of depression, and little understanding of existing GDEs or data to feed the Model to predict stream flow loss, how can it be said that this Monitoring Network can satisfactorily identify the occurrence of Undesirable Results?		
7	Brenton Kelly	Quail Springs Permaculture	Chapter 5	All Minimum Thresholds and most Measurable Objectives were calculated to allow for further dewatering to continue with vague references to how much worse it can get since 2015. In some areas the MO is 80' below 2015 levels with MT below that. How can that protect the nearby willows and cottonwoods? If groundwater elevations are allowed to drop that would indicate continued loss of groundwater storage which is an unacceptable Undesirable Result.		
7	Brenton Kelly	Quail Springs Permaculture	Chapter 6	What is this system supposed to do other than check a box for SGMA? No well completion information that had been submitted was uploaded to the DMS. Why is it separate from the Cuyama Basin Interactive Map? Who will update the DMS with this proprietary software?		
7	Brenton Kelly	Quail Springs Permaculture	Chapter 7	At first glance it looks like this GSP will "Improve reliability of water supplies for local disadvantaged communities. With no funding that looks more like just a letter of support for a significant need, and feels disingenuous to the disadvantaged communities left with dry wells and trucked water.		
7	Brenton Kelly	Quail Springs Permaculture	Chapter 8	This section does not present the plan to fill the chronic Data Gaps and holes in the Monitoring Network. Who, when and how will this get done? What coordination will happen with the county permitting authorities regarding new wells or new water demands?		
8	Lynn Carlisle	Cuyama Valley Family Resource Center				
9	Timothy Naughton	Resident				

CALIFORNIA
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SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Coast Regional Water Quality Control Board

March 15, 2019

Chairperson Derek Yurosek
Cuyama Basin Water District
4900 California Ave, Tower B, 2nd Floor
Bakersfield, CA 93309

Dear Chairperson Yurosek:

CENTRAL COAST WATER BOARD COMMENTS ON DRAFT CUYAMA VALLEY GROUNDWATER SUSTAINABILITY PLAN CHAPTER ON MINIMUM THRESHOLDS, MEASUREABLE OBJECTIVES, AND INTERIM MILESTONES

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) is a state agency that implements state and federal water quality laws within the Central Coast region. The Cuyama Valley groundwater basin falls within the jurisdictional area of our region and as such, the Central Coast Water Board has an interest in preserving, enhancing, and restoring water quality within the basin. Groundwater monitoring is a critical component towards addressing our interests and implementing our regulatory authority. The Central Coast Water Board has reviewed the draft chapter of the Cuyama Valley Groundwater Sustainability Plan (GSP) on *Minimum Thresholds, Measurable Objectives, and Interim Milestones* and would like to provide comments on the groundwater quality-related portions of this draft chapter.

In general, the Central Coast Water Board recommends that the number of chemical constituents included in the Minimum Thresholds (MT), Measurable Objectives (MO), and Interim Milestones (IM) be increased. The Central Coast Water Board agrees that MTs, MOs and IMs should be established for total dissolved solids (TDS), however, including only that single constituent is insufficient for determining whether a groundwater basin is being managed sustainably with respect to water quality or for determining if undesirable results are being addressed. Land use in the Cuyama Valley is dominated by commercial agriculture, an industry that utilizes a variety of chemicals and practices that pose threats to groundwater quality. Therefore, the Central Coast Water Board recommends expanding the list of chemical constituents in the MT, MO, and IM to include nitrate, arsenic, and major dissolved ions. The reasoning for this recommendation is described in detail below.

Nitrate

Nitrate contamination of groundwater from agricultural activities is widely documented in the Central Coast region, including within the Cuyama Valley. Approximately 9% of on-farm domestic wells in the Cuyama Valley exceed the human health standard for nitrate concentration in drinking water[1]. The draft chapter states that the Cuyama Valley groundwater sustainability agency (GSA) does not have the authority to influence fertilizer use, and we are not suggesting the GSA should undertake such a regulatory role. However, the GSPs are required to implement thresholds and monitoring that can identify when undesirable results are occurring. Given the current impairment from nitrate in the basin and ongoing agricultural activity, it is appropriate to require thresholds and monitoring for nitrate in the Cuyama Valley groundwater basin. Nitrate monitoring is not unusual in agriculturally-dominated basins; for example, the Salinas Valley GSA is recommending an expanded suite of chemical constituents for its thresholds and monitoring. The recommendation in their most recent draft includes up to 25 different chemical constituents, including nitrate and arsenic[2]. Finally, we recommend that nitrate be reported as nitrogen (nitrate as N), because this convention allows for easy comparison and summation (e.g., calculation of total nitrogen).

Arsenic

Arsenic is a toxic chemical compound that occurs naturally in relatively high concentrations in many of the sediments that form California groundwater basins, including those of the Central Coast. Groundwater data from the Water Board's GeoTracker GAMA[3] website indicates that 12% of the wells in the Cuyama Valley groundwater basin exceed the maximum contaminant level (MCL) for arsenic in drinking water. The highest concentration recorded in the basin occurred in 2011 and was more than six times greater than the MCL. Furthermore, recent studies in the Central Valley of California[4] and the Mekong Delta in Thailand[5] have demonstrated that ground subsidence associated with groundwater over-pumping can mobilize arsenic by 'squeezing' it out of subsurface clay layers. The resulting mobilized arsenic can then enter groundwater and increase arsenic concentrations in nearby water supply wells. Because there is documented overdraft and subsidence in the Cuyama Valley, there is the potential risk of anthropogenically-induced arsenic contamination of groundwater due to arsenic mobilization from clay layers in the Cuyama Valley basin. Lastly, in addition to sediment-related sources,

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[1] Central Coast Regional Water Quality Control Board, Staff Report for Regular Meeting of May 10-11, 2018. https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2018/may/item8/item8_stfrpt.pdf

[2] Salinas Valley Basin Integrated Sustainability Plan DRAFT Chapter 5: https://d3n9y02raazwpg.cloudfront.net/svbgsa/27fcdbda-fda7-11e8-9afa-0050569183fa-55ab52bf-8db9-4b38-9bb3-c22d83c76d92-1550881306.pdf

[3] Geotracker GAMA website: http://geotracker.waterboards.ca.gov/gama/gamamap/public/

[4] Overpumping leads to California groundwater arsenic threat. Smith, R., Knight, R., and Fendorf, S. Nature Communications, 2018. DOI: 10.1038/s41467-018-04475-3

[5] Release of arsenic to deep groundwater in the Mekong Delta, Vietnam, linked to pumping-induced land subsidence. Erban, L.E., Gorelick, S. M., Zebker, H. A., Fendorf, S. Proceedings of the National Academy of Sciences, 2013. https://doi.org/10.1073/pnas.1300503110

arsenic is a component in many pesticides commonly used on various crops. These factors suggest that arsenic should be included in the MTs, MOs, and IMs for the Cuyama Valley basin.

Major Dissolved Ions

Major dissolved cation and anion composition in groundwater reflects the source of recharge water, lithological and hydrological properties of the aquifer, groundwater residence time, and chemical processes within the aquifer. As such, major dissolved ions are valuable for identifying different groundwater types (via Piper or Stiff diagrams) and for "fingerprinting" source water from individual wells. In addition, ionic charge balance provides quality assurance that all the major ions are actually included in the analysis and that TDS concentrations are accurate. Finally, collection and analysis of major dissolved ion samples is easy and inexpensive, and the cost of the analysis is well worth the data provided, particularly if the well is already being sampled for other constituents.

The Central Coast Water Board thanks the GSA for the work being done in the Cuyama Valley and appreciates this opportunity to provide comments. If you have questions or would like to discuss these comments in greater detail, lease feel free to reach out to Daniel Pelikan, James Bishop, or Diane Kukol at the Central Coast Water Board:

Daniel Pelikan, P.G., C.Hg.
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James Bishop, P.G.
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Diane Kukol, P.G.
Senior Engineering Geologist
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Sincerely,

for John M. Robertson
Executive Officer

cc:

Matt Keeling, Central Coast Water Board, Matt.Keeling@Waterboards.ca.gov
Diane Kukol, Central Coast Water Board, Diane.Kukol@Waterboards.ca.gov
Daniel Pelikan, Central Coast Water Board, Daniel.Pelikan@Waterborads.ca.gov
James Bishop, Central Coast Water Board, James.Bishop@Waterboards.ca.gov
Andrew Renshaw, State Water Resources Control Board, Andrew.Renshaw@Waterborads.ca.gov
Natalie Stork, State Water Resources Control Board, Natalie.Stork@Waterboards.ca.gov
Sam Boland-Brian, State Water Resources Control Board, Samuel.Boland-Brien@waterboards.ca.gov

From: K. P. March <kmarch@bkylawfirm.com>
Sent: Thursday, October 17, 2019 7:54 PM
To: Taylor Blakslee <TBlakslee@hgcpm.com>
Subject: To the Cuyama Basin Groundwater Sustainability Agency ("CBGSA") regarding your final draft GSP; From Walking U Ranch, LLC, by Kathleen P. March, Esq., managing member of , LLC; Attn: Talyor Blakslee: Please POST as the Objection and Public Comment of W

101719

To the Cuyama Basin Groundwater Sustainability Agency ("CBGSA") regarding your final draft GSP

From Walking U Ranch, LLC, by Kathleen P. March, Esq., sole managing member of Walking U Ranch, LLC

Attn: Talyor Blakslee**: Please POST as the Objection and Public Comment of Walking U Ranch, LLC to CBGSP, and please to give to each member of CBGSA, and please give to the attorney(s) for CBGSA**

Dear CBGSA:

I just read the final draft proposed Cuyama Basis GSP ("GSP"), using the link that Taylor Blakslee sent today, 10/17/19. I write as managing member of Walking U Ranch, LLC, which owns and runs a 1000 acre cattle ranch located in the west end of the cuyama valley, 33 miles east of Santa Maria, CA.

Walking U Ranch, LLC objects to the GSP.

The proposed funding for the GSP is **directly CONTRARY** to what the vote was, taken on 7/10/19, of the full Cuyama Basin GSA, on how to fund the Cuyama Basin GSP. My husband and I (yes we are both lawyers) were present, and I spoke to GSA. In addition, I had briefed the controlling law, by letters to the GSA, before the 7/10/19 meeting.

The vote of the full CBGSA, on 7/10/19, which was practically unanimous, was to fund the Cuyama Basin GSP **by charging fees based on water extracted**, and **NOT to fund the GSP by charging any per acre fees**.

Directly contrary to that vote of the full GSA, the "final proposed draft" GSP, at Section 8 (Implementation) at pages 8-4 to 8-5, and in the executive summary, says the GSP may be funded by charging extraction fees, **or by charging per acre assessments**, or by a combination of both means. Here is the specific language at p.8-4 and 8-5 of the GSP:

"the CBGSA will develop a financing plan that will include one or more of the following financing approaches:

> • Pumping Fees: Pumping fees would implement a charge for pumping that would be used to fund GSP implementation activities. To meet the funding needs of the GSP, fees would be lower when pumping is higher, such as current pumping levels, and higher when pumping is lower, such as when sustainable pumping levels are achieved. Although this funding approach would meet the financial needs of the GSP and CBGSA, it may discourage pumping reductions due to cost. The financing plan developed by the CBGSA would evaluate how to balance the need for funding with encouraging pumpers to commit to compliance with desired groundwater pumping

reduction goals. DRAFT Draft Groundwater Sustainability Plan 8-5 Implementation Plan June 2019

• Assessments: Assessments would charge a fee based on land areas. There are two methods for implementing an assessment based on acreage. The first option would assess a fee for all acres in the Basin outside of those in federal lands. This option would not distinguish between land use types. The second option would be to assess a fee only on irrigated acres. Similar to the pumping fee approach, assessment based on irrigated acreage could affect agricultural operations and contribute to land use conversions, which could affect the assessment amount or ability to fully fund GSP implementation.

• Combination of fees and assessments: This approach would combine pumping fees and assessments to moderate the effects of either approach on the economy in the Basin. This approach would likely include an assessment that would apply to all acres in the Basin, rather than just to irrigated acreage. It would be coupled with a pumping fee to account for those properties that use more water than others.

During development of a financing plan, the CBGSA would also determine whether to apply fees across the Basin as a whole or just within the management areas. The CBGSA may choose to apply an assessment across the Basin and a pumping fee within the management areas, or choose to set different levels of assessments or fees based on location within a management area or not, or they may choose another combination of the above approaches based on location. Prior to implementing any fee or assessment program, the CBGSA would complete a rate assessment study and other analysis consistent with the requirements of Proposition 218."

The "per acre assessment" is DIRECTLY CONTRARY to that vote of the GSA on 7/10/19.

Even more dishonest, the final draft GSP does not anywhere reveal that the Vote, taken on 7/10/19 , of the full GSA, was to fund the GSP **by charging fees based on water extracted**, and **NOT to fund the GSP by charging any per acre fees**.

Your final draft GSP does not even refer to the fact that Vote was taken by the full GSA, and that the Vote was to ONLY charge fees based on water used (aka "water extraction fees"), and was NOT to fund the GSP by charging any per acre fees.

A per acre fee is a **property tax**, which pursuant to the California Constitution, Proposition 218, CANNOT be charged, unless the GSA holds **and wins** a valid proposition 218 election, in which all landowners in the Valley vote. I've briefed the controlling law in my letters sent to GSP before the 7/10/19 meeting of the full GSA. It would cost a lot of money for the GSA to publicize and hold a valid proposition 218 election, and GSA would not be able to win a proposition 218 election, because the number of acres owned by ranchers (like Walking U Ranch, LLC) and other non-farmers, is far greater than the number of acres owned by the big farming operations. You couldn't win a majority vote. And a proposition 218 election requires, as I recollect, that any new property tax be approved by a 2/3rds vote of the property owners.

If CBGSA tries to charge a per acre fee, without holding and winning a valid Proposition 218 election, Walking U Ranch, LLC will sue CBGSA. I said that at the 7/10/19 meeting. GSA and its attorneys would do well to take that to heart, because my husband and I are attorneys, and we know how to sue to

protect the rights of Walking U Ranch, LLC, and the other landowners in the Cuyama Basin who are not OVERUSING water, if necessary.

If Walking U Ranch, LLC has to sue CBGSA to stop illegal acreage based assessments, Walking U Ranch, LLC will be seeking award of Ranch's attorneys fees from having to sue GSA, and Ranch will be entitled to be reimbursed for Ranch's attorneys fees incurred suing GSA. That is because charging a fee ("assessment") based on **acreage owned** is a **property tax**, and it violates the California Constitution to charge a fee ("assessment") based on acreage owned, unless the GSA has held, and won a valid Proposition 218 election.

I note that the above quoted language at 8-4 and 8-5 of "Implementation" of GSP, **fails** to say that GSP cannot assess any charges/fees/assessments based on **acres owned, unless GSA holds and wins a Proposition 218 election**. The above quoted language saying "consistent with the requirements of Proposition 218 " is way too vague. Your GSP should state what the California Constitution requires, which is GSP cannot assess charges based on acres owned, unless GSA holds and wins a valid Proposition 218 election. And explain what that entails.

Sadly, it appears from the final draft plan, that GSA is hoping that no one notices that the GSP, which GSA is now proposing, is DIRECTLY CONTRARY to the Vote, held on 7/10/19, of the full GSA, which was NOT to assess any charges based on acres owned.

Sadly, it appears that whoever got the above "per acre assessment" language put into this final draft plan (the large farming operations, I'm guessing?) are hoping that no one complains it is illegal to charge fees based on acres owned, unless GSA has held and won a valid Proposition 218 election. **Walking U Ranch, LLC hereby complains**. So stop hoping your GSA can get away with illegally assessing fees based on acreage owned, without holding and winning a valid Proposition 218 election, which you can't win. **Fix your GSP, by taking out the above, highlighted in yellow, references to funding your GSP by charging fees based on land area (ie, acres owned). Take that out from section 8. Take it out from the executive summary.**

Bottom line: Delete from your final draft GSP, the text I have highlighted in yellow, above, about "assessments based on land area", and also take out the text about using a combination of such assessments along with pumping fees. Walking U Ranch, LLC requests you make those deletions.

You also need to delete from your executive summary of GSP, all language about charging fees based on on acreage. Here is an example in the executive summary of that improper language, which needs to be deleted:

> "The CBGSA Board of Directors will evaluate options for securing the needed funding. Similar to the funding options for the CBGSA basin-wide activies,
> **options for funding management area costs include fees based on** groundwater pumping**, acreage, or a combinantion of these**, and pursuit of any available grant funds".

Please Reply to me, to kmarch@bkylawfirm.com, Taylor, to confirm receipt, and to confirm you will post this email as the public comment (and Objection to GSP) of Walking U Ranch, LLC, and to confirm you will forward this to all GSA members, and to GSA's lawyer(s).

After your GSA considers Walking U Ranch, LLC's herein Objection to GSP, and request that GSA correct the GSP, please let me know whether or not GSA is going to delete the fees assessed base on acres owned provisions from your GSP. Thank you.

KPMarch

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"Have a former bankruptcy judge for your personal bankruptcy attorney"

Taylor Blakslee

From: K. P. March <kmarch@bkylawfirm.com>
Sent: Friday, October 18, 2019 11:51 AM
To: Taylor Blakslee
Cc: Joe Hughes
Subject: RE: To the Cuyama Basin Groundwater Sustainability Agency ("CBGSA") regarding your final draft GSP; From Walking U Ranch, LLC, by Kathleen P. March, Esq., managing member of , LLC; Attn: Talyor Blakslee: Please POST as the Objection and Public Comment

101819

To Taylor Blackslee, administrator for CBGSA; with CC to Joe Hughes, Esq., legal counsel to CBGSA

From Walking U Ranch, LLC, from KPMarch, Esq., Bankruptcy Law Firm, PC

Re: **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** to the Cuyama Basin Groundwater Sustainability Agency ("GSA") final draft Groundwater Sustainability Plan ("GSP")

Taylor:

Thx for confirming receipt of my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP**, that I emailed to you last night, as administrator of CBGSA.

Thx for confirming you will put my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** in the packet to be disseminated to the GSA on November 1, 2019.

But in addition to your forwarding my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** email of last night (10/17/19) to the GSA, I requested, in my email of last night, that my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** be posted as a **public comment**, to bring this problem to the attention of the rest of the landowners in the Cuyama Valley.

Please REPLY to confirm you will post my email of last night as a public comment, and how soon you will do so, and tell me how to check to see that it has been posted as a public comment. Or if you will NOT do so, please tell ME how to post my Walking U Ranch, LLC's OBJECTION and COMMENT to GSP as a public comment, myself. Thx.

Also, I need some information. Is there a GSA meeting on November 1, 2019, and if so what address and what time, and can I address the GSA regarding my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** at that meeting?
Is there a GSA meeting on November 6, 2019, and is it at 6pm at the Cuyama High School, and can I address the GSA regarding my **Walking U Ranch, LLC's OBJECTION and COMMENT to GSP** at that meeting?

It is disappointing that the final proposed CBGSP is directly contrary to the 7/10/19 vote of the GSA, which (almost unanimous vote) was NOT to charge any fees/assessments to fund the CBGSP, on a land owned basis.

Worse than being disappointing, the final draft GSP is **illegal**, because it says assessments may be charged to fund the GSP, based on **land owned**—and doing so would be charging a **property tax**, which requires holding and winning a valid Proposition 218 election, BEFORE any assement can be made on a **land owned basis**—but the GSA does NOT say that fees based on land owned would only be charged, pursuant to the CBGSP, if GSA holds and wins a valid Proposition 218 election. Omitting that makes the final draft GSP illegal, as contrary to what the California Constitution, Proposition 218, requires to charge assessments based on land owned (aka property tax) basis.

I just finished a 5 week trial, so if Walking U Ranch, LLC needs to sue GSA, for the illegal wording of the final draft plan, at least my law firm is available to do so. However, I suggest it would be better for all concerned, if the illegal wording of the GSP were fixed by GSA, **without Walking U Ranch, LLC having to sue to correct the illegal language**, so I suggest GSA do that.

I am "cc"ing GSA's lawyer, Joe Hughes, Esq., on this email: **Attorney Hughes, please REPLY to me regarding whether this illegal language will be fixed, by GSA, or whether suit is going to be necessary to get it fixed. Thx**

When you REPLY to me, please give me what information you have, as to why the final draft GSP is **directly contrary to the 7/10/19 vote** of the GSA, on the "do not assess fees on land owned basis" point? Thx

Please include this email in what you put in the packet of materials to be given to GSA on November 1, 2019. Please REPLY to confirm you will do so. Thx.

Please post this email as part of posting last night's email (**Walking U Ranch, LLC's OBJECTION and COMMENT to GSP**). Please REPLY to confirm you will do so. Thx.

KPMarch

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"Have a former bankruptcy judge for your personal bankruptcy attorney"

From: Taylor Blakslee [mailto:TBlakslee@hgcpm.com]
Sent: Thursday, October 17, 2019 9:46 PM
To: K. P. March
Cc: Jim Beck; Joe Hughes
Subject: RE: To the Cuyama Basin Groundwater Sustainability Agency ("CBGSA") regarding your final draft GSP; From Walking U Ranch, LLC, by Kathleen P. March, Esq., managing member of , LLC; Attn: Talyor Blakslee: Please POST as the Objection and Public Comment

Kathleen,

I received your below email dated October 17, 2019 at 7:54 pm and it will be included in our material to the Board that will be distributed on Nov 1, 2019. Additionally, I will forward your comment to the Board ahead of the Nov 1 Board packet mailout.

Thank you for your comments.

Best,

Taylor Blakslee
Project Coordinator

(661) 477-3385

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Taylor Blakslee

From: K. P. March <kmarch@bkylawfirm.com>
Sent: Wednesday, October 23, 2019 1:38 PM
To: Taylor Blakslee
Subject: Taylor Blakslee for CBGSA, from Walking U Ranch, LLC, by KPMarch, Esq., managing member of LLC: Two Questions: It appears there is a meeting at 4pm and a meeting at 6pm, of CBGSA, on Nov 6, 2019. My husband and I plan to come to meeting to address GSA

102319

To Taylor Blakslee for CBGSA, from Walking U Ranch, LLC, by KPMarch, Esq., managing member of LLC: Two Questions:

(1) It appears there is a meeting at 4pm and a meeting at 6pm, of CBGSA, on Nov 6, 2019. My husband and I plan to come to meeting to address GSA about the issues I emailed you Walking U Ranch, LLC's OBJECTION and PUBLIC COMMENT about on 10/17/19 and 10/18/19. What is the correct time for us to come to meeting to address GSA—4pm or 6pm? REPLY and tell me please. Thx. And WHY are there 2 meetings of GSA, one at 4pm and one at 6pm, on the same day?

(2) Regarding the 2019 Groundwater extraction Fee Report, why does it show, at p8, regarding CBGSA FY 2019-20 Budget, under **Legal & Admin**, the Amount of $60,000 labeled as "**Prop 218-Basin-wide**" for months July-Jan? What is the $60,000 actually for? Appears it is for a period (july 2019 to jan 2020) that is soon ending? Yes, am I reading that correctly, or not? **Has that $60,000 been spent, or will it be spent, and FOR WHAT**?

Please REPLY and tell me the Answers. Thx

Also, when last we talked on phone, you said you were going to suggest the ERRORs in the final draft CBGSP that OBJECTED to and COMMENTED on, be fixed. Has that happened? Reply and tell me status please. Thx.

Please include this email, along with my previous emails, in packet you give to GSA for the Nov 6 meeting. Thx

KPMarch

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"Have a former bankruptcy judge for your personal bankruptcy attorney"

Comments for the Cuyama Basin Draft Groundwater Sustainability Plan (GSP)

Submitted by Bob Giragosian, Managing Member Kern Ridge Growers, LLC.

Date submitted: 5/22/2019:

Do any of you think that carrots cause Chicken Pox? Probably not because lots of people eat carrots and do not get Chicken Pox while there are people who get chicken pox that do not eat carrots.

What does this have to do with water sustainability? The farmers in the Cuyama Water Basin are being accused of causing an overdraft situation with the water table. The water table has been falling and therefore it must be the farmers who are causing the problem. Afterall, the farmers in the Cuyama Water Basin pump in excess of 100,000 gallons per minute of water during the peak pumping season; therefore, farmers must be the problem and if we just reduce the amount of farming the problem will be fixed.

Clearly, there are lots of other farming areas where the farmers also pump thousands of gallons per minute the same as we do. In many of those areas there is not an overdraft situation; such as the southern part of the Cuyama Water Basin, as well as many areas in Northern California and farming regions all over the United States. Why is it that the farmers can pump as much as they want in these other areas without affecting the water table in their area?

What happens to the water after we pump it out of the ground to farm carrots? There are only 3 places for the water to go:

1) The water goes into the atmosphere, (evaporation).
2) The water goes into the plant, (evapotranspiration).
3) The water goes into the ground, (infiltration).

There is no other place for the water to go.

In researching evaporation, the study that I found, Irrigation of Agricultural Crops in California by Blain Hanson Department of Land, Air and Water Resources, University of California, Davis, study showed that sprinkler irrigated lettuce has approximately 8 inches per year of evaporation, including loss due to evapotranspiration. If we assume that lettuce takes approximately 3-acre feet of water, then the evaporation loss is 23 % of the total water put on the field. Since, the growing of lettuce is similar to carrots, in that it takes about the same amount of water and has a similar growing cycle, it seems appropriate to use this study to estimate the evaporation and evapotranspiration of carrots. Our primary crop in the Cuyama Valley is carrots and therefore my analysis will be on the farming of carrots using the evaporation and evapotranspiration rate associated with the growing of lettuce. let's assume that carrots farmed with sprinklers are going to experience a 23% water loss to evaporation and evapotranspiration, similar to lettuce. I am confident from my farming experience that this is a reasonable assumption.

Let's look at where the water goes. Let's examine a typical acre of carrots farmed.

Carrots that are produced on a field in the Cuyama Water Basin are going to yield approximately 80,000 pounds of carrots per acre farmed. Carrots are 90% water, therefore the amount of water harvested in the carrots is:

80,000 pounds X 90% = 72,000 pounds of water per acre farmed.

The weight of water per gallon is 8.3 pounds per gallon, therefore the number of gallons of water in one acre of carrots is:

72,000 pounds divided by 8.3 pounds per gallon = 8,675 gallons per acre

The percentage of pumped water that ends up in the actual product being shipped is:

3-acre feet per acre farmed X 326,000 gallons = 978,000 gallons of water per acre of carrots farmed

The percentage of water being removed from the area is:

8,675/978,000 =.887% which is less than 1 % of the water being pumped per acre

Therefore, we have the following situation caused by pumping water to farm carrots in the Cuyama Water Basin:

1) The water going into the atmosphere through evaporation and evapotranspiration is approximately 23%
2) The water that is harvested and is transported out of the area is less than 1 %
3) Therefore, the water that is returned to the ground water, through infiltration, is over 76% of the pumped water

The next thing we need to look at is the average rainfall for the Cuyama Valley. The average annual rainfall on the valley floor is 5 inches per year accounting for approximately 15% of the water pumped out of the ground.

To summarize the effects of ground water pumping by carrot farmers in the Cuyama Valley, let's look at the whole picture:

Amount of water pumped per farmed acre:	**978,000 gallons**
From pumped amount we will deduct the amount of water:	
That amount of water that is lost due to evaporation	
and evapotranspiration	(224,940) gallons
The amount of water that is transported in the carrots	(8,675) gallons
Leaving a balance to return to the ground water (infiltration)	**744,345 gallons**
Plus, we need to add back annual rainfall, (5"/year)	
as reported by Wikipedia on the Cuyama Valley	135,833 gallons
Plus the annual rainfall on the acreage that we fallow, (5"/year).	
(As we presently fallow 50% of our acreage)	135,833 gallons
Net effect to ground water from pumping water for farming carrots	**1,016,051 gallons**

This would create a surplus of the difference back to the water table of **38,051 gallons per acre farmed.** This surplus is primarily due to our ongoing practice of fallowing 50% of our acreage**.**

This analysis does not include the snowpack and the rainfall that occurs in the hills surrounding the Cuyama Valley which is a significant amount of water going to the Valley floor further increasing the benefit to the water table.

Let's continue the discussion to go into more detail about the 3 areas where the pumped water can go. The first one is back to the water table accounting for approximately 76% of the total water pumped. We use monitoring probes in the Cuyama Valley which allow us to monitor the movement of water underground. What we will see is that after a few hours of watering the water will saturate over 2 feet below ground and within one week the 2 feet section under the carrots will be nearly dry due to the water traveling to deeper depths below the 2 feet root zone. We then repeat the cycle every week therefore the water is traveling at least 2 feet per week, which means that the water will reach the water table in a maximum of 350 weeks or approximately 7 years, assuming the water table is at 700 feet below ground level. I have been farming carrots in the Cuyama valley since 1978, 41 years ago, but I am quite certain that carrots were farmed in the Cuyama Valley prior to the time I started in the carrot business. The ground water level monitoring shows that infiltration back to the water table is effective due to the character of the free draining soils in the area. Water from pumping is returning to the water table every day.

Let's consider what happens to the water lost to evaporation. Evaporation is the source of atmospheric water, therefore without evaporation, there would not be any rainfall. Clearly evaporation is necessary for rainfall; weather it is the result of water evaporating from the ocean or from our fields, both are creating atmospheric water that will be become rainfall. Evaporation is critical to the water cycle and the fact that there is a significant amount of evaporation is not a bad thing because evaporation is the source for rainfall on earth. In my analysis our rainfall on the farmed land exceeded the evaporation rate that we experience in the production of carrots.

The third place that the water goes is into the product, carrots, that we eat. When you eat a carrot, the water is processed through your body and all water that was stored is now free to replenish the ground water table. As a matter of fact, all food contains a high percentage of water and through the digestive process we expel the water because the human body maintains a level of approximately 60% water.

In essence all pumped water goes right back to the ground water table. When looking at a problem with falling water tables, we must look at the source of the water. Pumping water out of the ground is never the source of the water. The pumping allows us to use the same water over and over again as God intended.

If you really are interested in protecting the ground water in the Cuyama Valley, you must first determine the source of the water and look what is fueling the water table in the Cuyama Valley.

How do water wells work? We pump water form a (16") casing with very little dwell capacity. Dwell capacity would be the number of feet from standing water to the pumping water level times the gallons per foot in a 16" casing. According to the information on the WWW.torrentee.com web site there is 10.4 gallons per foot in a 16" casing. Therefore, in our typical well we have approximately 200 feet of water above the pumping level creating a dwell capacity of roughly 2080 gallons. Many of our wells pump in excess of 1000 gallons per minute. For a well to pump 1000 gallons per minute under pressure, it must receive 1000 gallons per minute. For example if we pump 1000 gallons per minute and we only receive 800 gallons per minute our well will go dry in less than 15 minutes because we have a very small

holding capacity and therefore a small change in incoming water will cause the well to either go dry right away or the pumping will have to be decreased to the 800 gallons per minute that we are replenishing at in order to keep the well running. In the peak of the summer when it is very hot we are pumping around the clock without a loss of water which means the well continually replenishes at the pumping rate. The source of the water must be very large, and its standing level must also be at the 700 feet below ground level similar to our well.

We also looked at what happens to the nearby well when we start pumping. I have 2 wells that are 1 mile apart. We checked the standing water level on both wells prior to operating either well, We then started well 1 to see if it had any effect on the standing level in well 2. There was no change before the well was started and after the well was running. The reason we try to keep wells a minimum of ½ mile apart is to prevent the chance of one well affecting the performance of another well. This also demonstrates the transmobility of the water through the aquifer in the Cuyama Valley.

I have enclosed well reports on several of the wells in the Cuyama Valley which tend to indicate that the water table is going up and down over time which is what you would expect if the water table is not a function of the pumping level. If pumping ground water caused the water table to drop, then the table would continually be falling as we pumped out water to farm. The more we pump the further down the table would go. We would be lowering our bowls yearly to stay with the new water level. But in reality, when looking at well records during the last 10 years, we see that the water table goes up and down almost at random, clearly illustrating that pumping water for farming is not causing the water table to change.

In conclusion, I believe that following our farming model of fallowing 50% of our irrigated acreage will lead to sustainable ground over time consistent with the well data that I have enclosed along with my comments. I do not think that a change in pumping level is necessary or appropriate for ground water sustainability in the Cuyama Valley. I further believe that the well monitoring that has been attached to these comments is consistent with my conclusions.

Irrigation of Agricultural Crops in California

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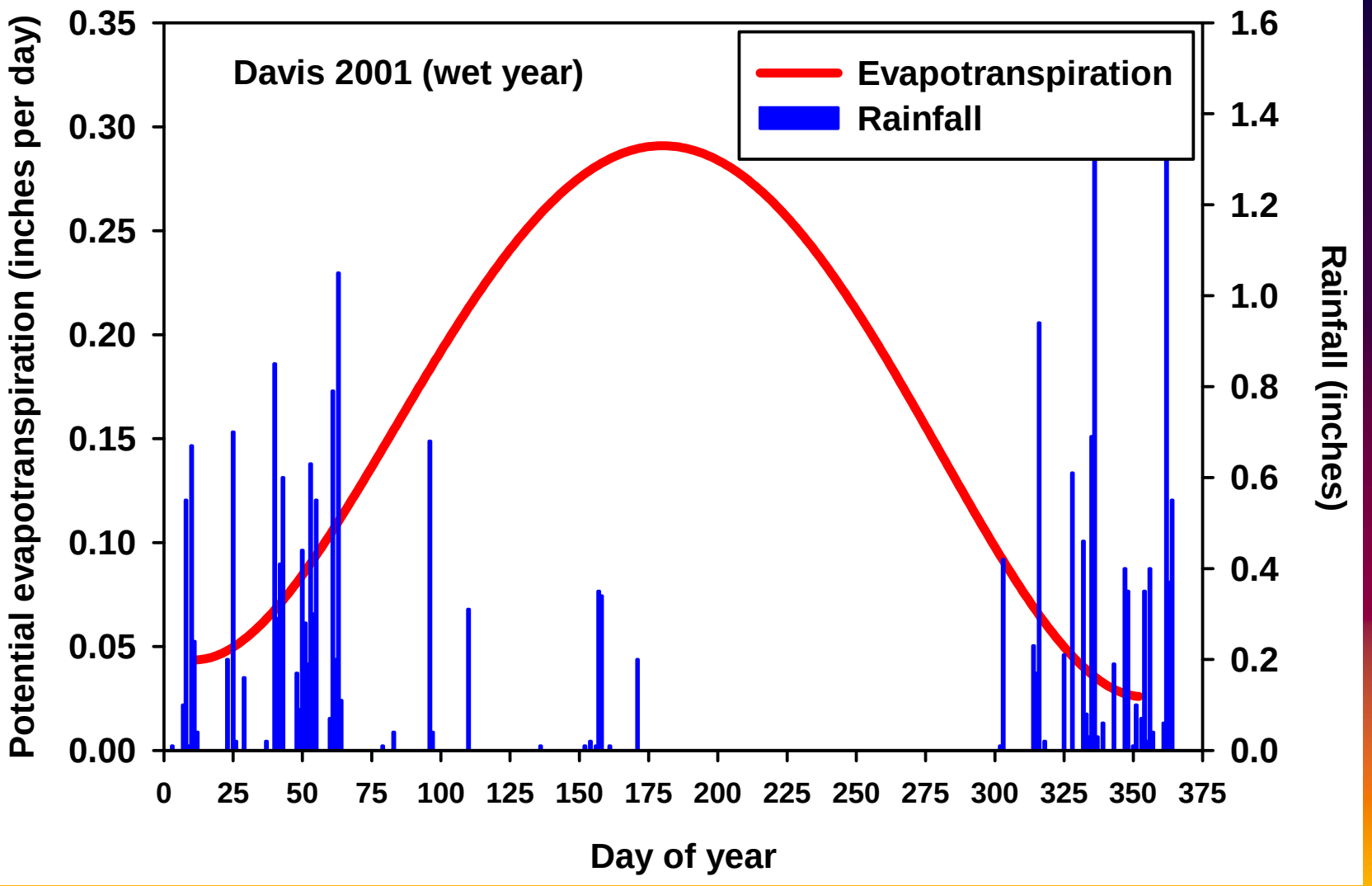
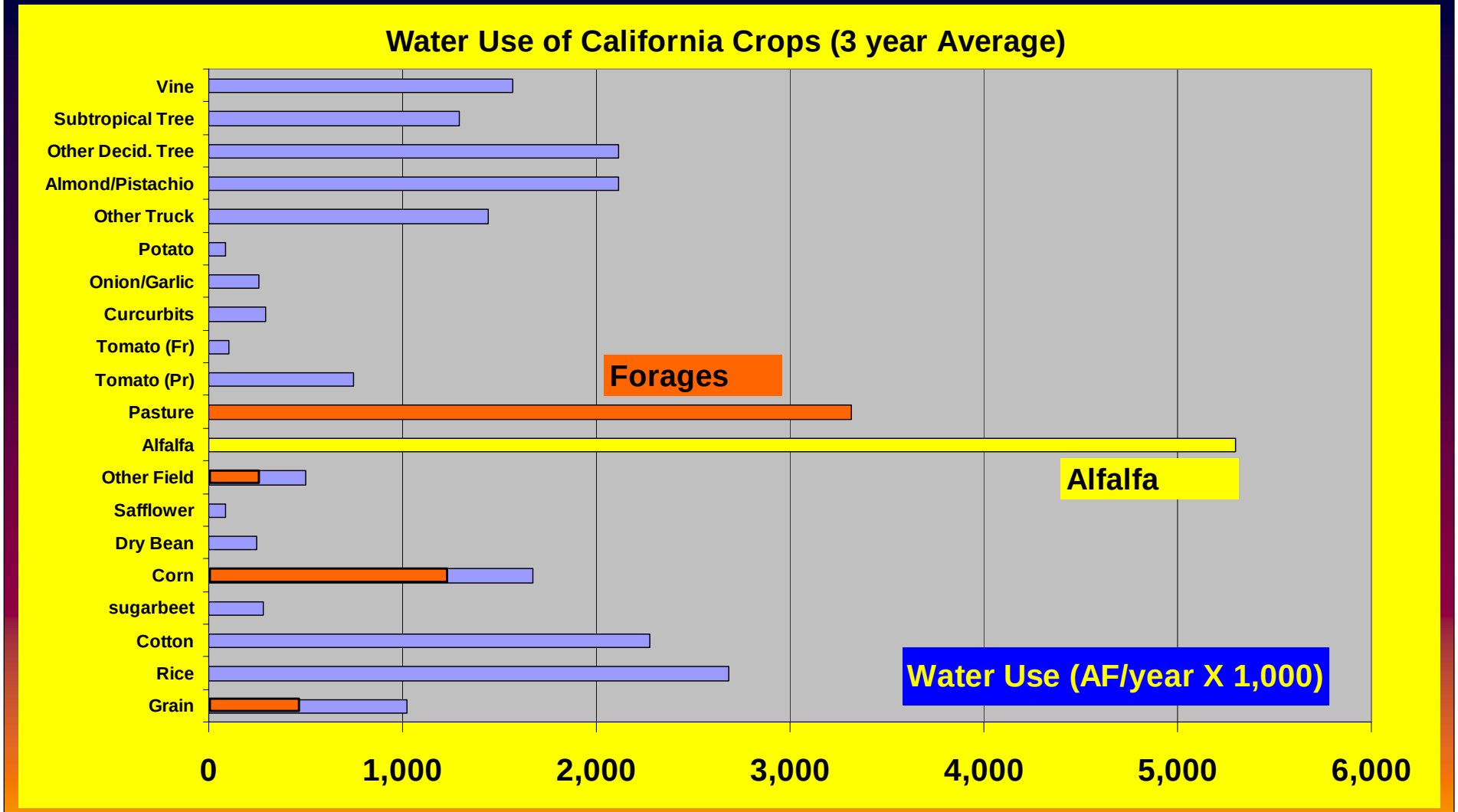
What percentage of California's water is used by agriculture?

- 80 %: based on the developed water supply
- 52 %: based on the total water supply of a dry year
- 29 %: based on the total water supply of a wet year

Why irrigate?



Water Use of California Crops



How much water does agriculture need?

What is evapotranspiration (ET)?

- Evapotranspiration: crop water use
  - Water evaporation from plant leaves (transpiration)
  - Water evaporation from soil surface
  - More than 95% of the water uptake by plants is evaporated
- Factors
  - Climate: solar radiation, temperature, humidity, wind
  - Plant: crop type, stage of growth, health
  - Soil moisture content

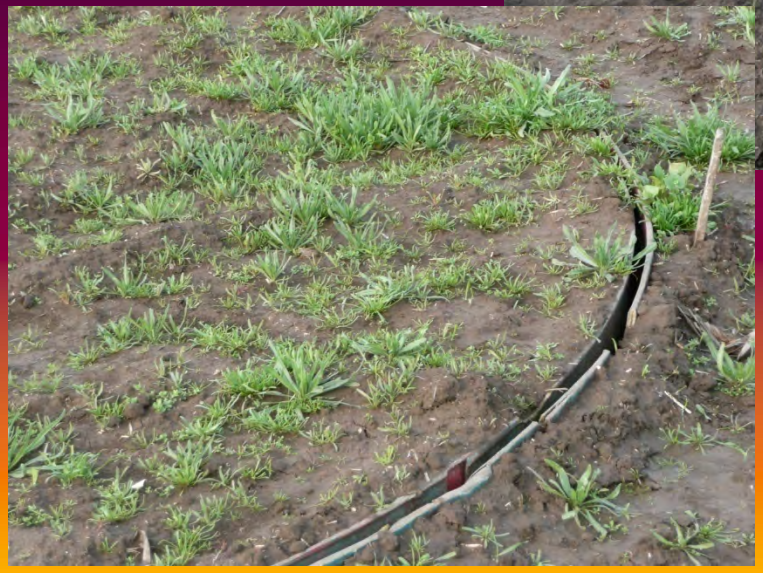
Units of evapotranspiration (ET)

- Volume of water
  - One acre-inch = 27,160 gallons
  - One acre-foot = 325,900 gallons
- Depth of water (inches, feet, cm, mm)
  - Standardized water use (independent of field size)
  - One inch of water = 1 acre-inch per acre = 27,160 gallons per acre

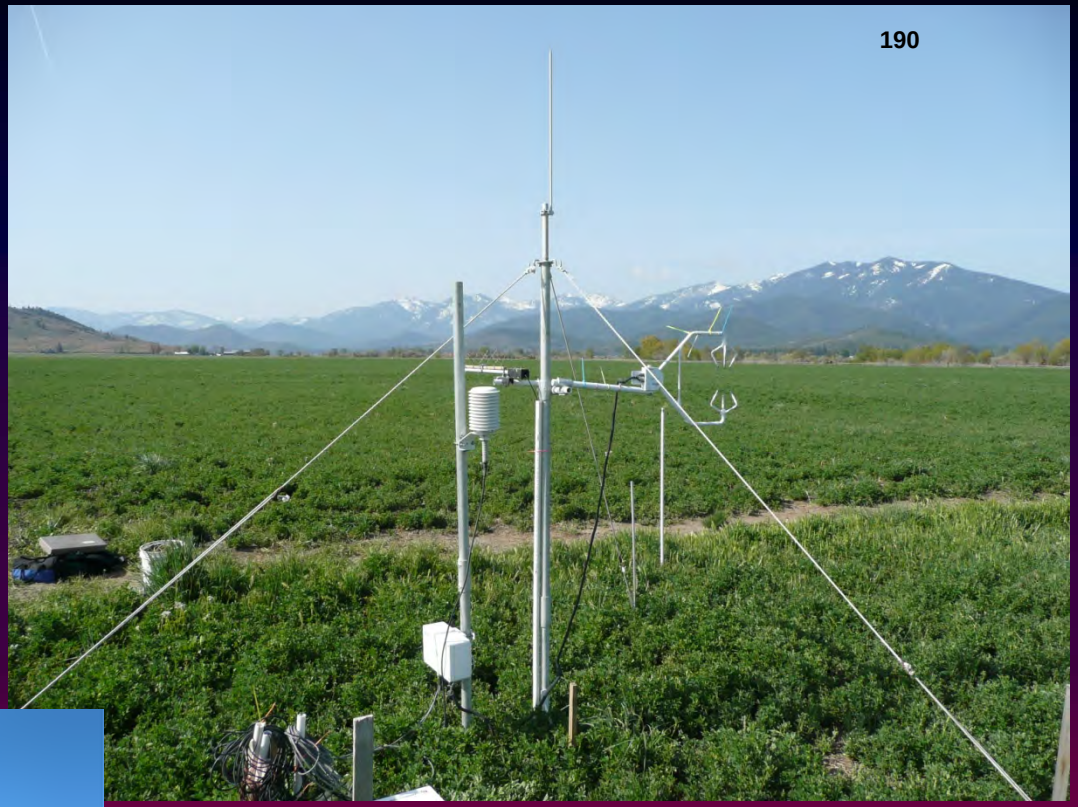
Measuring evapotranspiration (ET)

- Difficult and expensive to measure
- Methods
  - Lysimeter – very expensive, restricted to ag field stations
  - Meteorological methods – moderately expensive, portable
  - Soil moisture measurements – inexpensive, can be inaccurate
- California Irrigation Management Information System (CIMIS)
  - Network of weather stations Installed and maintained by the University of California and California Department of Water Resources
  - Weather data used to calculate a reference crop ET (ET of grass or alfalfa)
  - Crop coefficients (Kc) used to relate reference crop ET to actual crop ET
  - ET = Kc x Reference crop ET

Lysimeter



Meteorological Methods

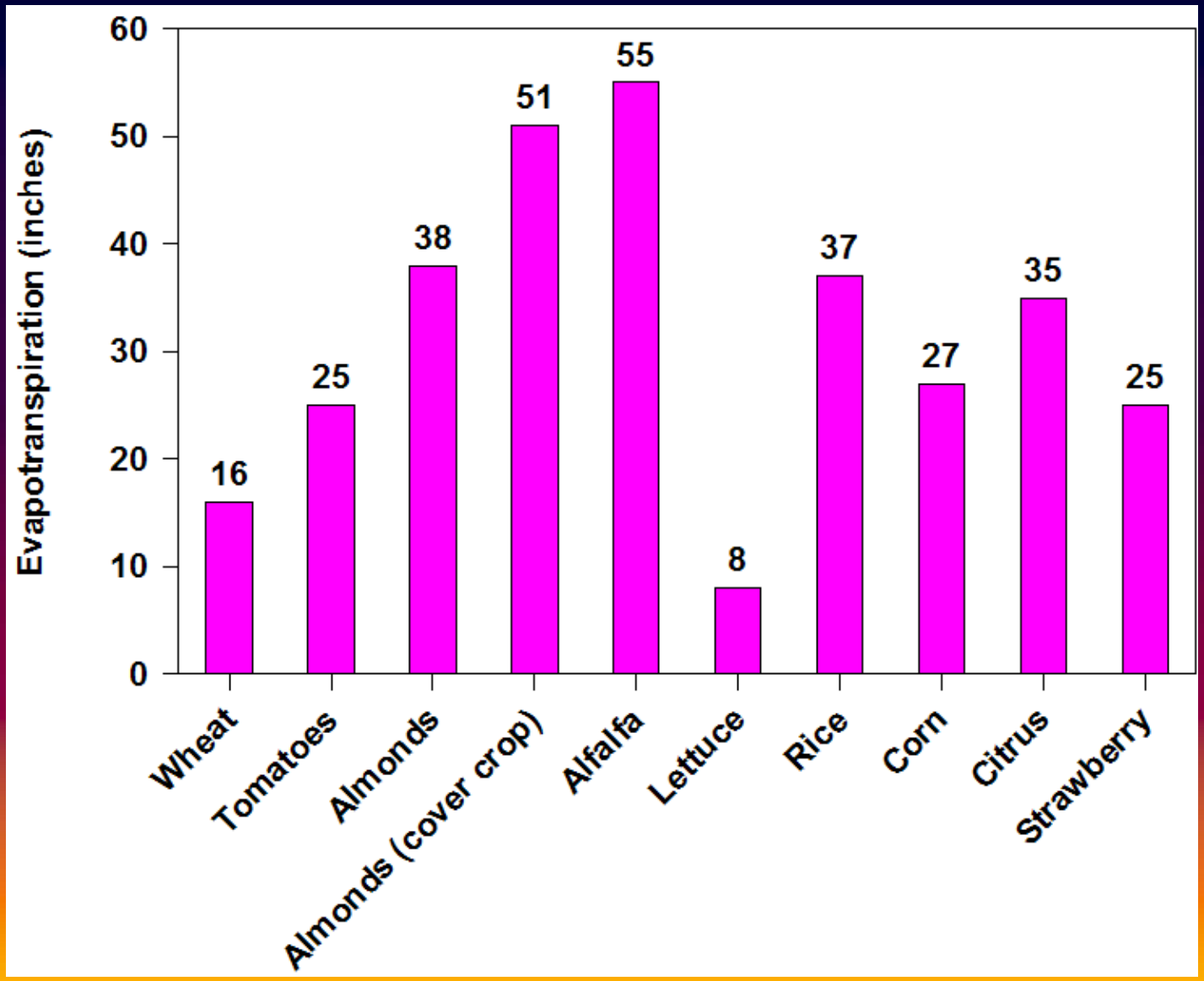


Soil moisture measurements

CIMIS weather station – data and complex equations are used to calculate a reference crop ET

Crop ET = crop coefficient x reference crop ET

Evapotranspiration of selected crops



Alfalfa

Where do dairy products come from?

- Dairy products: ice cream, cheese, milk, yogurt, butter
- Dairy cows produce the milk used to make these products
- Dairy cows eat about 70% of the alfalfa produced in California

Alfalfa

- Products: ice cream, milk, cheese, yogurt, butter
- Seasonal ET of alfalfa = 55 inches of water = 55 acre-inches per acre = 1,500,000 gallons per acre
- 160 acres: ET = 160 acres x 1,500,000 gallons per acre = 240,000,000 gallons of water per year (does not included irrigation system inefficiencies)
- Are we wasting water growing alfalfa?

Grain

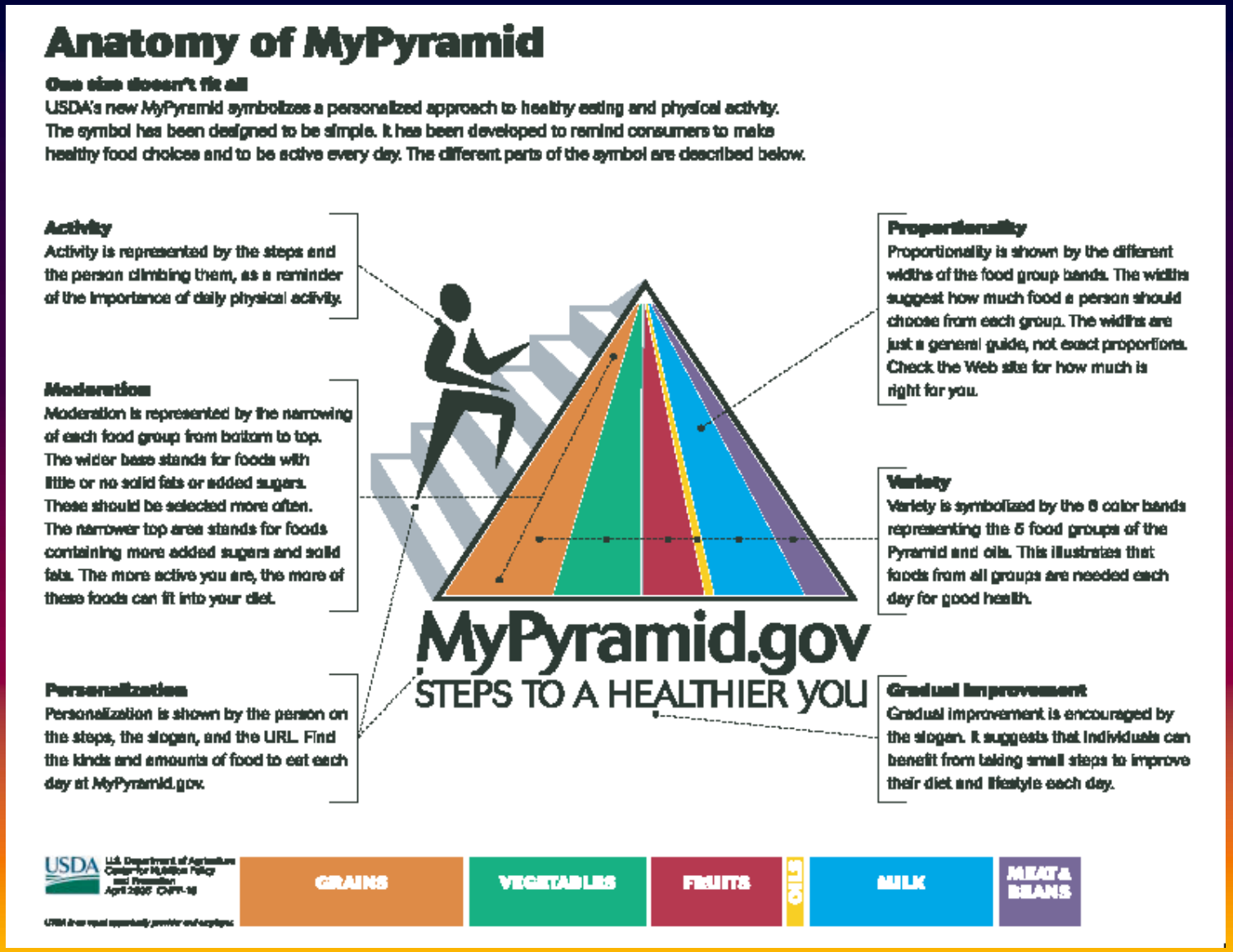
- Products: bread products, rice, cereal, chicken, eggs, steak
- Seasonal ET of wheat = 16 inches of water = 16 acre-inches per acre = 435,000 gallons per acre
- 160 acres: ET = 160 acres x 435,000 gallons per acre = **69,600,000** gallons of water per year (does not included irrigation system inefficiencies)

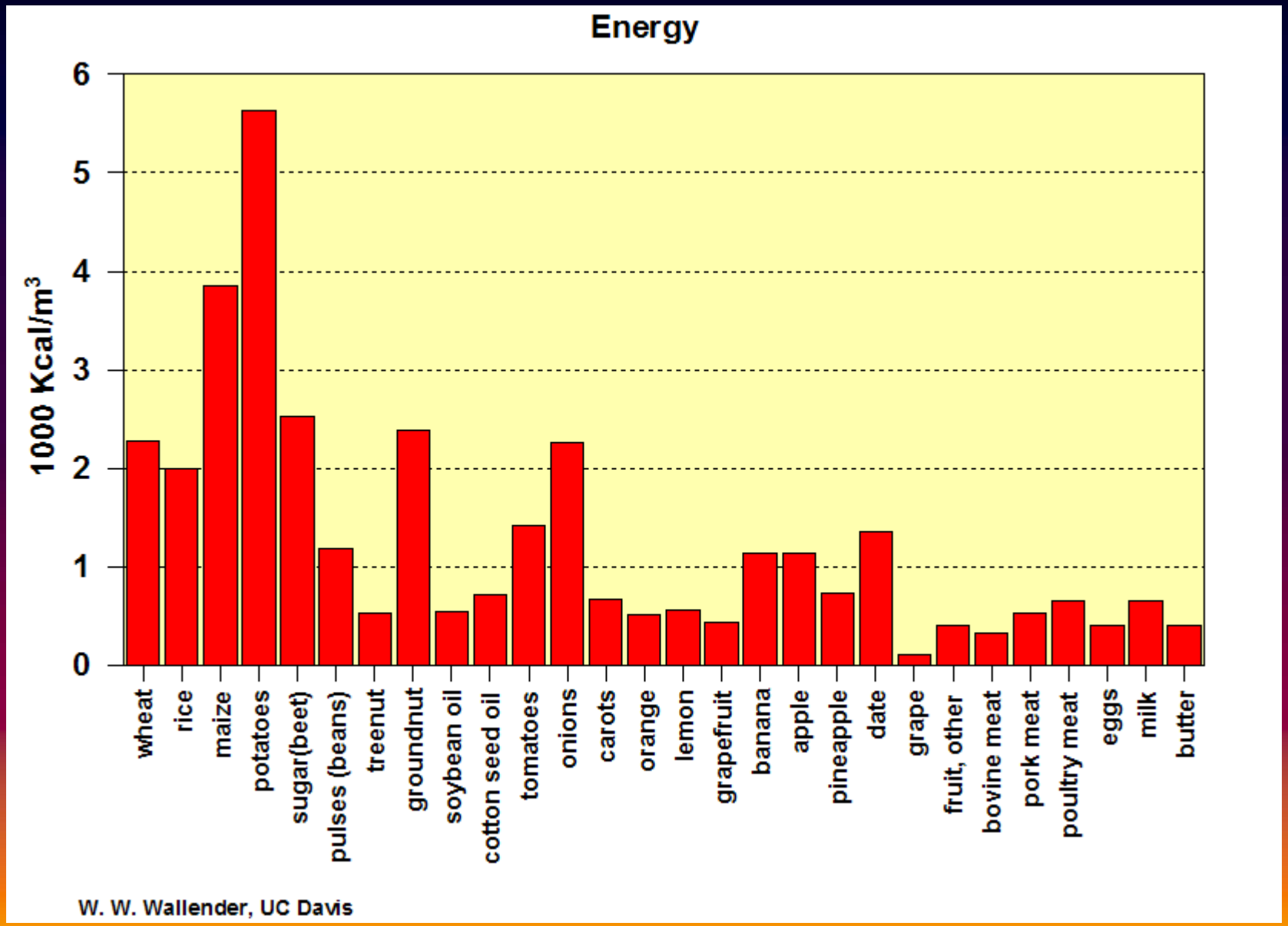
What crops should be grown in California?

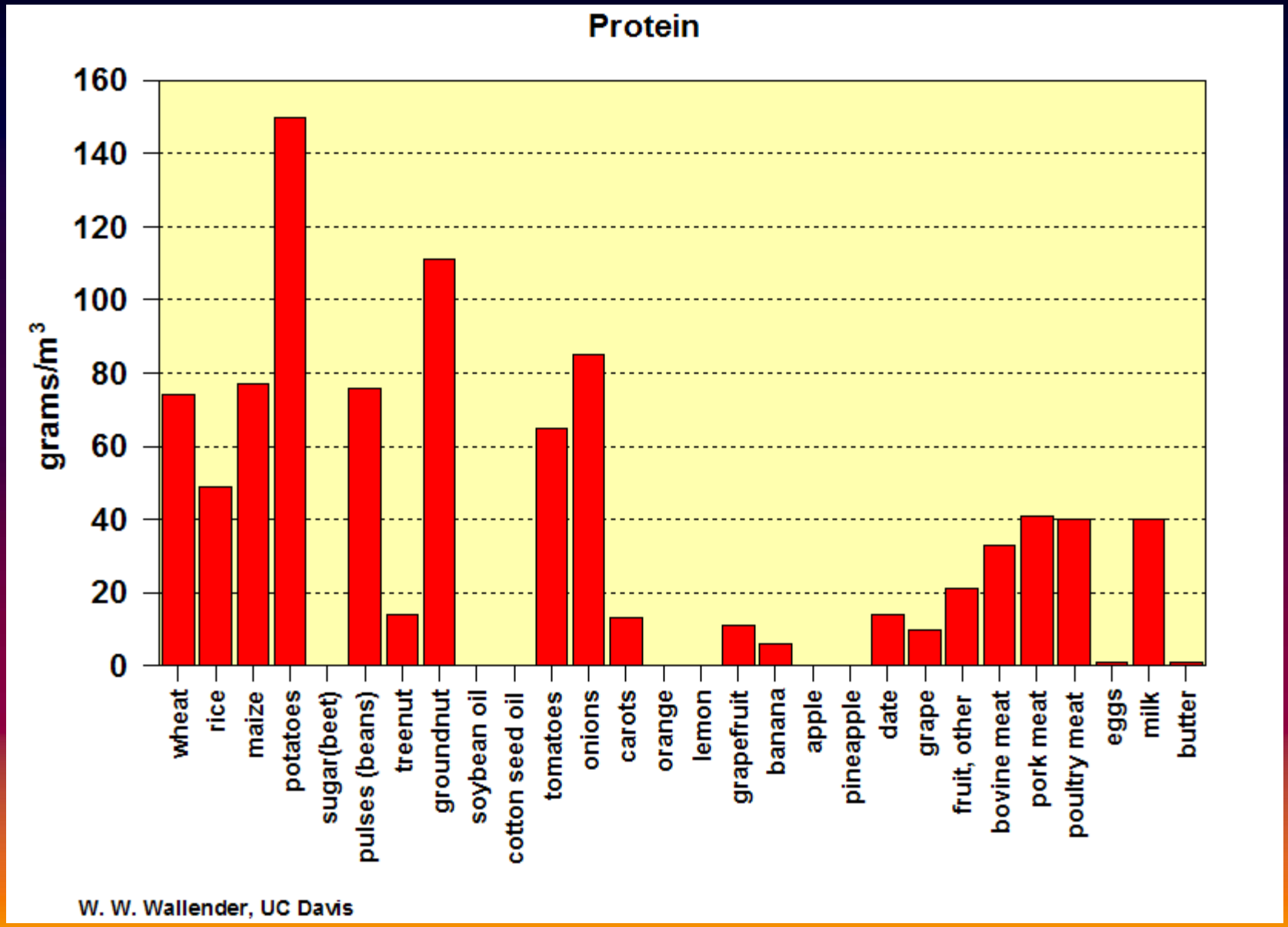
Maximize dollar returns?

- Only high cash value crops should be grown
  - Tree crops
  - Vegetable crops
  - Tomatoes
- Low cash value crops should not be grown
  - Wheat
  - Corn
  - Cotton
  - Alfalfa?

Maximize human health?




Energy
1000 Kcal/m3
0
1
2
3
4
5
6
wheat
rice
maize
potatoes
sugar(beet)
pulses (beans)
treenut
groundnut
soybean oil
cotton seed oil
tomatoes
onions
carots
orange
lemon
grapefruit
banana
apple
pineapple
date
grape
fruit, other
bovine meat
pork meat
poultry meat
eggs
milk
butter
W. W. Wallender, UC Davis


Protein
grams/m3
160
140
120
100
80
60
40
20
0
wheat
rice
maize
potatoes
sugar(beet)
pulses (beans)
treenut
groundnut
soybean oil
cotton seed oil
tomatoes
onions
carots
orange
lemon
grapefruit
banana
apple
pineapple
date
grape
fruit, other
bovine meat
pork meat
poultry meat
eggs
milk
butter
W. W. Wallender, UC Davis

The situation

- Agriculture cannot compete economically with the urban/industrial sector for water.
  - Uses a large amount of water per unit of production
  - We do not pay very much for the agricultural products
- Regardless of the economics, if we want food we will have to pay the price in terms of water and land for producing the agricultural products used to produce our food. There is no other choice if we want food!
- Lower-cash value crops provide a major part of our diet

Irrigation methods in California

Irrigation efficiency

- Definition: ratio of water beneficially used to amount applied
- Beneficial uses
  - ET – major use
  - Salinity control
  - Frost protection
  - Drip system maintenance
- Losses affecting the irrigation efficiency
  - Surface runoff – water that runs off the lower end of gravity irrigated fields
  - Deep percolation – water that percolates through the soil below the root zone
  - Evaporation
- Different numbers for farm, irrigation district, regional irrigation efficiencies

Furrow irrigation (gravity)

Flood or border irrigation (gravity)

Wheel-line sprinkle system

Hand-move sprinkle system

Portable solid-set sprinkler system

Center-pivot sprinkler system – inappropriate for many California soils

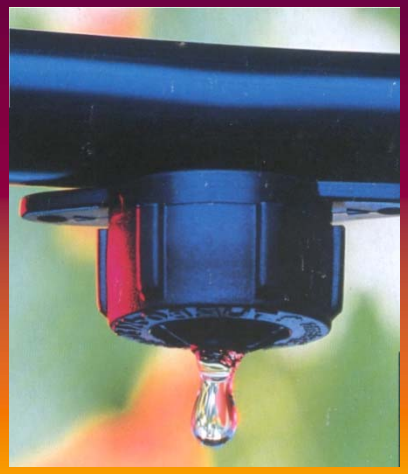
Linear-move sprinkler system

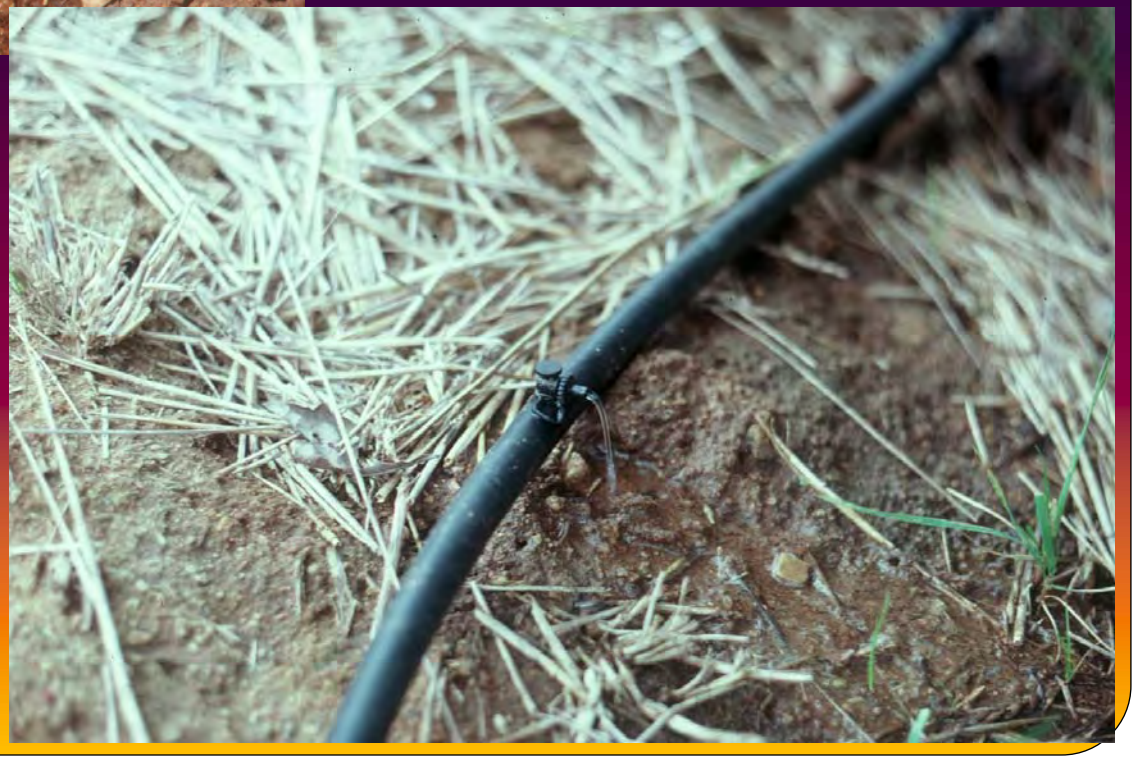
Microsprinklers – tree crops

Microsprinkler

Drip irrigation – vineyards, tree crops

Drip emitter





Drip irrigation – row crops

Surface drip irrigation

Subsurface drip irrigation

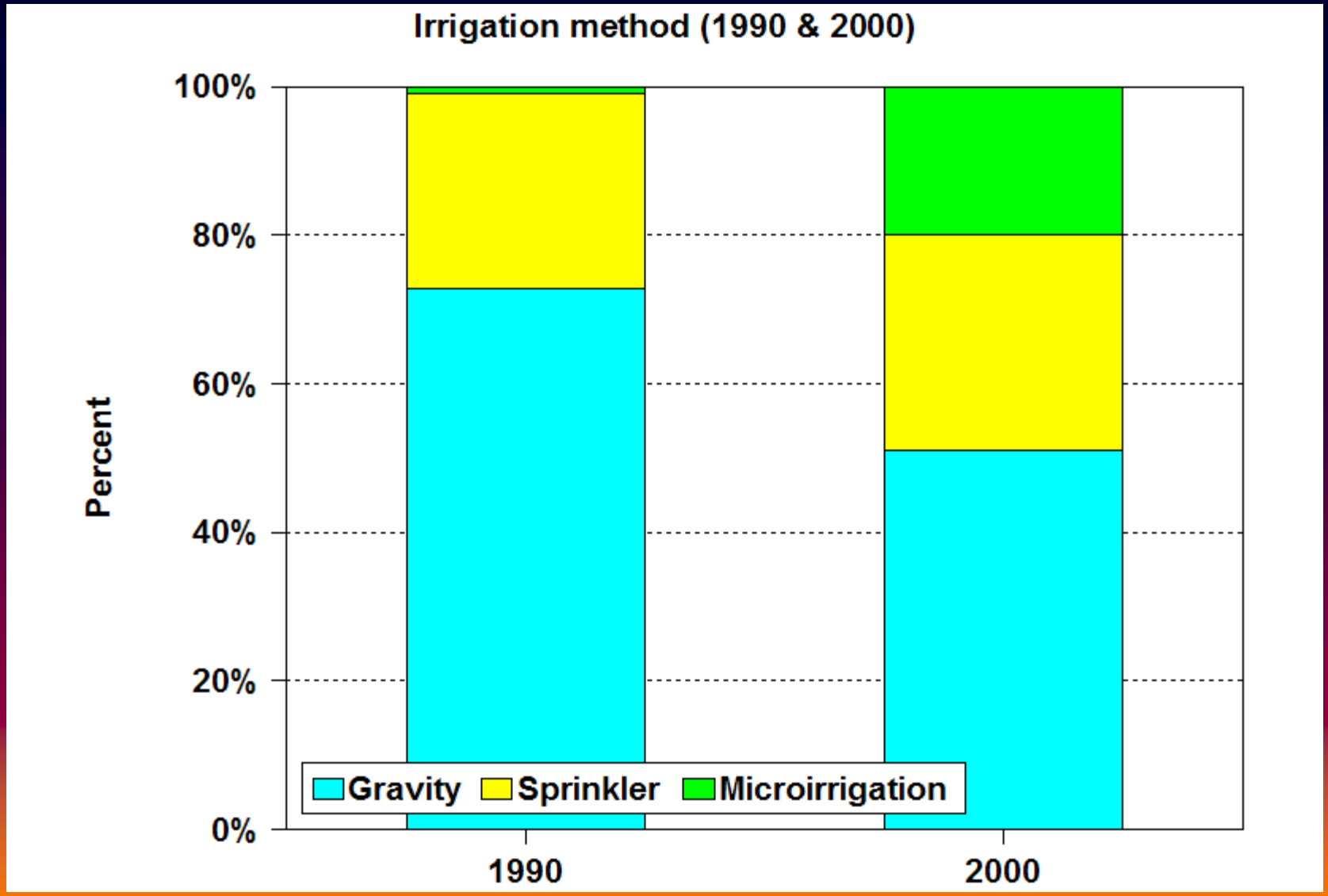
Drip tape

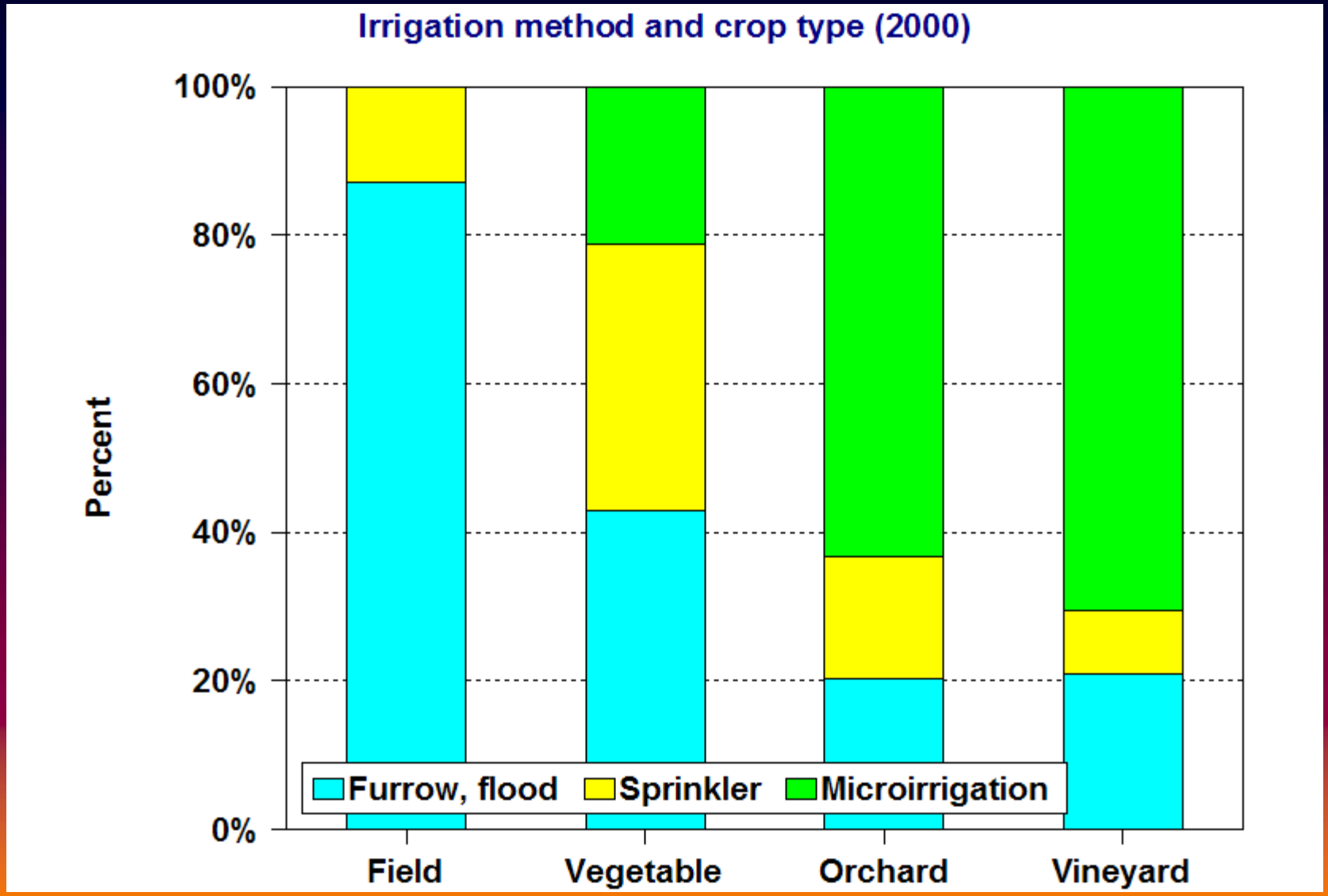
Which irrigation method is the best?

- Gravity irrigation
  - Low capital cost
  - Low labor cost to operate
  - Difficult to manage efficiently – trial and error approach
  - Surface runoff can cause water quality problems
- Sprinkler irrigation
  - Moderate capital cost
  - Low to moderate labor costs to operate
  - Easy to manage
  - Efficiency limited by wind effects
- Microirrigation
  - High capital costs (up to $1,000 per acre)
  - Precise application of water throughout a field
  - Moderate labor costs
  - Easy to manage
  - Highly susceptible to emitter clogging

Maximum potential irrigation efficiencies

Irrigation method	Irrigation efficiency (%)
Gravity (furrow, flood)	70-85
Sprinkle	
Hand-move, wheel-line, solid set	70-80 (low wind)
Center pivot, linear-move	80-90
Microirrigation	80-90

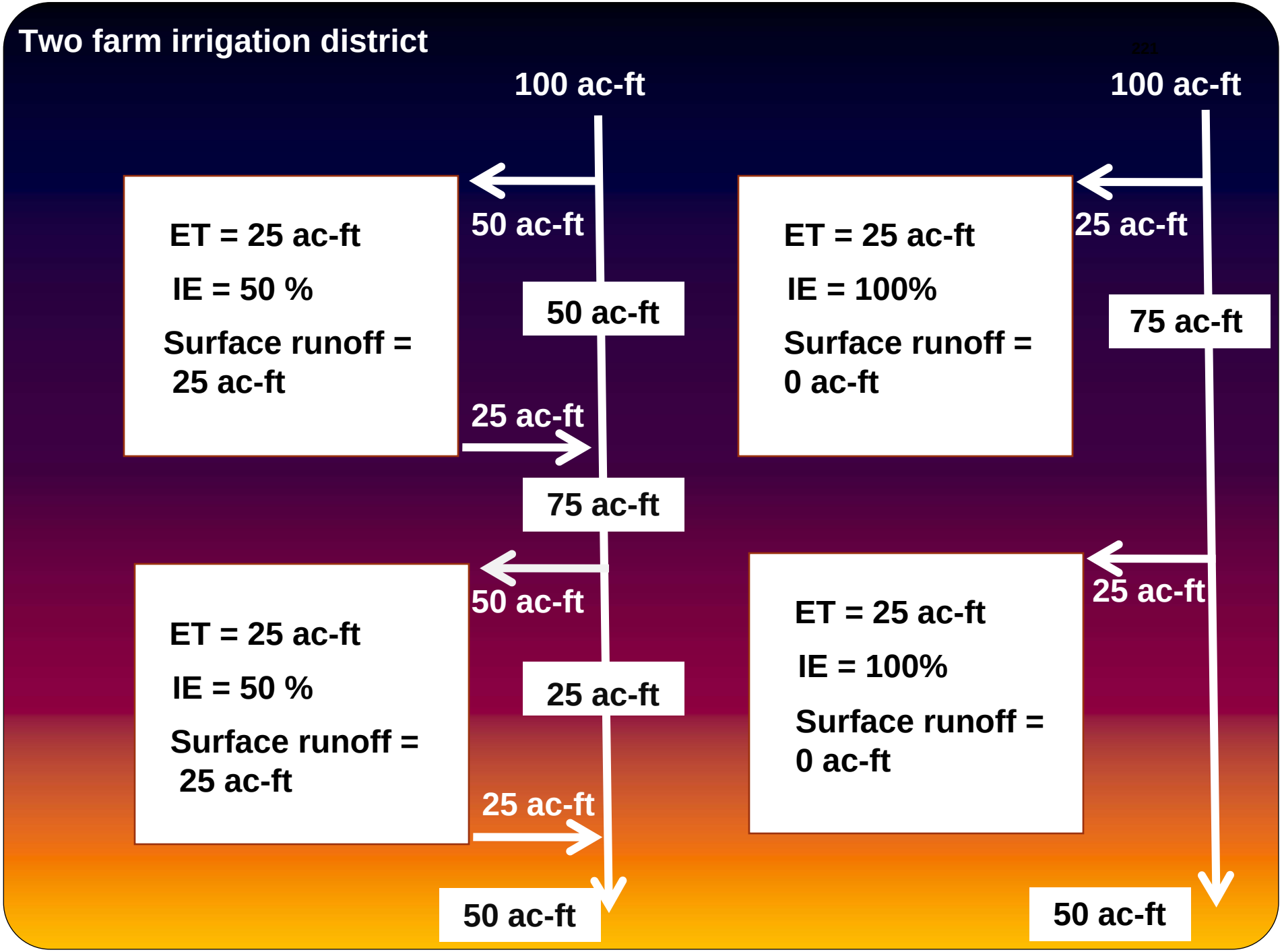

Irrigation method (1990 & 2000)
100%
80%
60%
40%
20%
0%
Percent
Gravity
Sprinkler
Microirrigation
1990
2000


Irrigation method and crop type (2000)
Percent
100%
80%
60%
40%
20%
0%
Furrow, flood
Sprinkler
Microirrigation
Field
Vegetable
Orchard
Vineyard

Will increasing the farm irrigation efficiency save water that can be used elsewhere?

- Numerous studies have attempted to answer this question
  - Many researchers are not very familiar with irrigated agriculture
  - Some ignore reality
  - Questionable assumptions, results, and conclusions
- Problem – losses from one farm frequently are used by downstream water users
  - Difficult to track where the water goes
  - Little or no real water savings

Two farm irrigation district



Estimates of potential water savings from increased irrigation efficiency

- University of California study – 843,000 acre-feet
  - University , state and federal agencies, irrigation districts, grower organizations
  - Considered reuse of water
  - Estimate based on amount of water not reused downstream
- Consultant study – at least 4.400,000 acre-feet
  - Did not consider reuse of water
- Improved water quality may be the primary benefit of increased irrigation efficiency rather than water savings – reduced surface runoff (sediments, pesticides, nutrients)

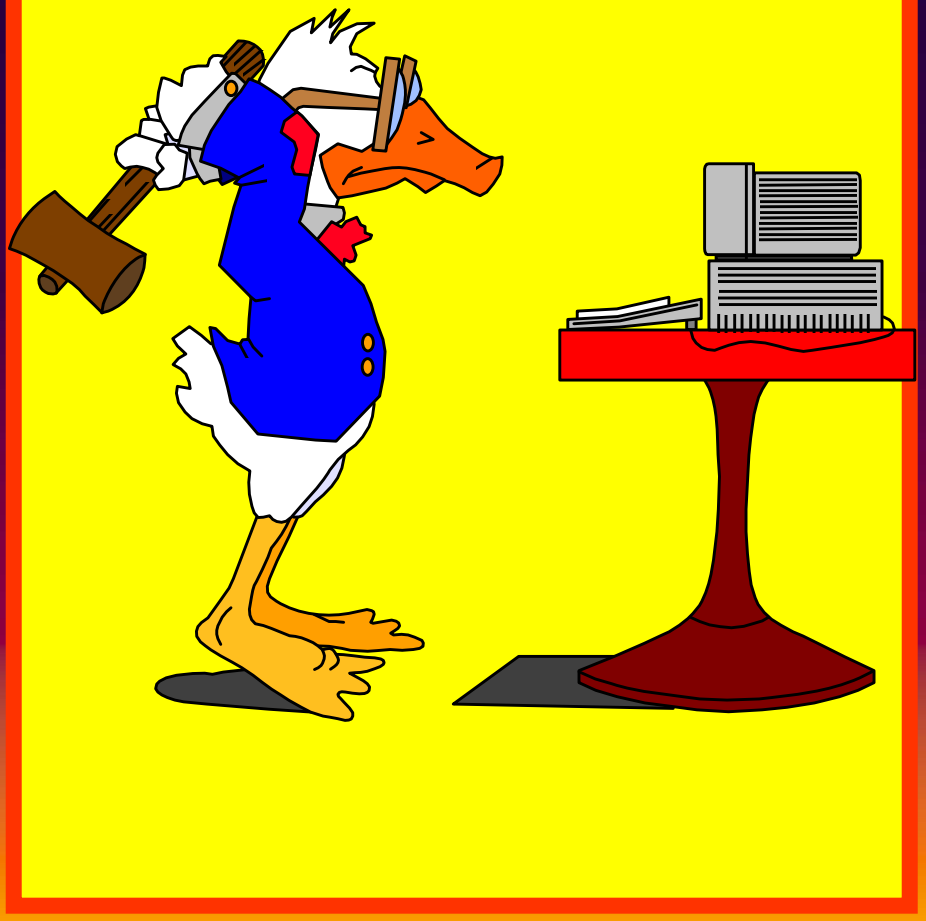
Where will the water come from?

- No more dams for water storage
- Water conservation from increased irrigation efficiency?
- Removal of agricultural land from production – most likely source of water for satisfying the increased urban/industrial and environmental water demands
  - DWR water transfer program
  - MWD program of removing alfalfa fields from production on a rotating basis in the Palo Verde Valley – water is transferred to the LA area
- Deficit irrigation of agricultural fields
  - Regulated deficit irrigation – trees and vine crops (UC Davis)
  - Mid-summer deficit irrigation - alfalfa (UC Davis)
- Reduced urban/industrial and environmental demands

Summary

- Agriculture is California's largest user of water.
- It takes a lot of water to produce a crop.
- The price that society has to pay for food is the water and land required to produce the crops needed for food. There is no other choice.
- It is unlikely that increasing irrigation efficiency will have a large impact in supplying the predicted future water needs of the urban/industrial and environmental sectors.
- Agricultural land will need to be removed from production to supply the needed water.

Have a good day!



opti DATA

DATA QUERY LOGOUT

Groundwater Level for OPTI Well #608

Site Info | Chart | Data

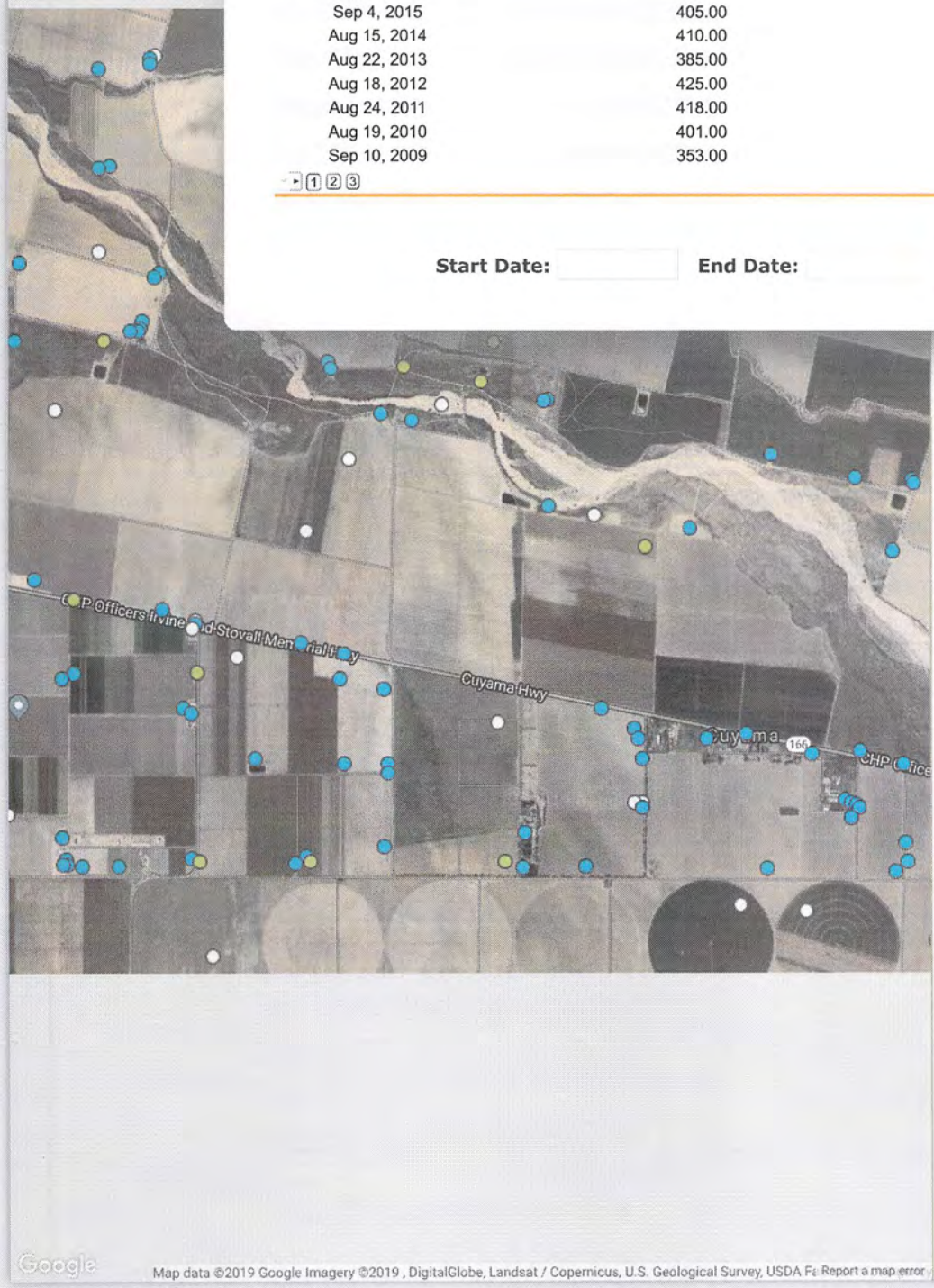
Site Details

Depth to Groundwater

Date	Depth to Groundwater (Feet)	Measurement Issue
Aug 9, 2017	424.00	
Apr 10, 2017	388.00	
Aug 24, 2016	435.00	
Sep 4, 2015	405.00	
Aug 15, 2014	410.00	
Aug 22, 2013	385.00	
Aug 18, 2012	425.00	
Aug 24, 2011	418.00	
Aug 19, 2010	401.00	
Sep 10, 2009	353.00	

1 2 3

Start Date: End Date: Update Export



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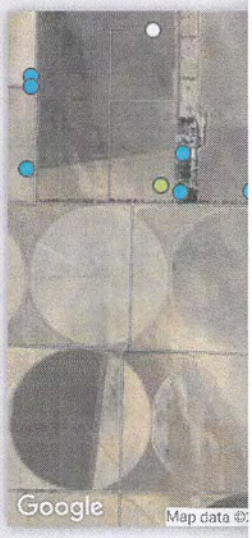
DATA QUERY LOGOUT

Groundwater Level for OPTI Well #667



Site Info | Chart | Data

Site Details

Depth to Groundwater ▼

Date	Depth to Groundwater (Feet)	Measurement Issue
Mar 21, 2016	445.00	
Sep 30, 2014	466.00	
Oct 23, 2013	487.00	
Dec 13, 2012	466.00	
Nov 17, 2009	97.00	
Dec 9, 2005	376.00	
Apr 21, 2005	385.00	
Aug 25, 2004	409.00	
Sep 24, 2003	399.00	
May 5, 2003	378.00	

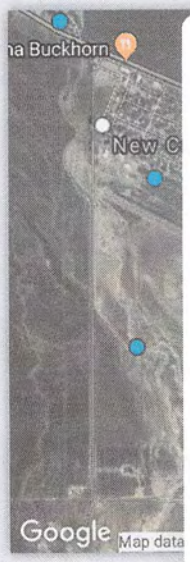
1 2

Start Date: End Date: Update Export

opti DATA

DATA QUERY LOGOUT

Map List



Groundwater Level for OPTI Well #68

Site Info | Chart | Data

Site Details

Depth to Groundwater

Date	Depth to Groundwater (Feet)	Measurement Issue
Feb 15, 2008	219.14	
Nov 20, 2007	221.35	
Mar 21, 2007	217.30	
Feb 21, 2006	203.99	
Mar 2, 2005	206.42	
Feb 24, 2004	206.55	
Apr 24, 2003	211.89	
Mar 26, 2002	221.25	
Mar 29, 2001	220.30	
Apr 8, 2000	216.10	

1 2 10 18

Start Date: End Date: Update Export

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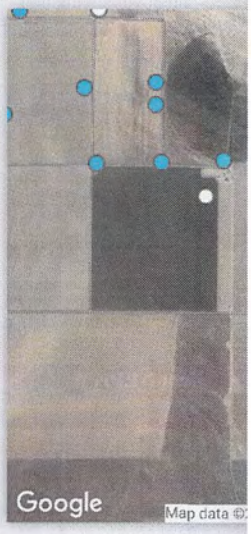
opti DATA

DATA QUERY LOGOUT

Groundwater Level for OPTI Well #660



Site Info | Chart | Data

Site Details

Depth to Groundwater ▼

Date	Depth to Groundwater (Feet)	Measurement Issue
Mar 23, 2016	462.00	
Nov 4, 2014	621.00	
Oct 3, 2012	598.00	
Sep 21, 2010	563.70	
Dec 29, 2009	554.50	
Dec 8, 2008	448.00	
Dec 1, 2008	420.48	
Nov 20, 2007	556.80	
Sep 15, 2005	579.90	

Start Date: End Date: Update Export

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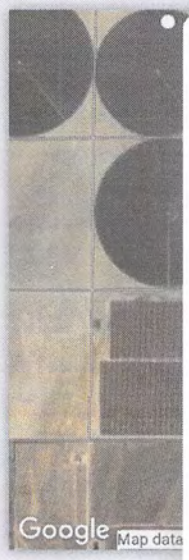
opti DATA

DATA QUERY LOGOUT

Map List



Groundwater Level for OPTI Well #620

Site Info | Chart | Data

Site Details

Depth to Groundwater ▼

Date	Depth to Groundwater (Feet)	Measurement Issue
Aug 17, 2017	594.00	
Aug 17, 2016	595.00	
Sep 2, 2015	585.00	
Aug 8, 2014	586.00	
Aug 27, 2013	559.00	
Dec 7, 2012	493.00	
Aug 13, 2012	573.00	
Aug 13, 2011	587.00	
Aug 16, 2010	539.00	
Aug 12, 2009	530.00	

1 2 3

Start Date: End Date: Update Export

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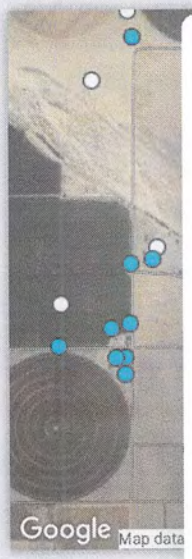
DATA QUERY LOGOUT

Map List



Groundwater Level for OPTI Well #653

Site Info | Chart | Data

Site Details

Depth to Groundwater ▼

Date	Depth to Groundwater (Feet)	Measurement Issue
Mar 23, 2016	465.00	
Sep 17, 2014	532.00	
Oct 9, 2013	514.00	
Oct 3, 2012	509.00	
Aug 1, 2012	472.00	
Sep 22, 2010	481.50	
Feb 2, 2010	472.22	
Dec 29, 2009	472.22	
Nov 20, 2007	467.60	
May 29, 2007	458.40	

1 2

Start Date: End Date: Update Export

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opti DATA

DATA QUERY LOGOUT

Map List

Groundwater Level for OPTI Well #640

Site Info | Chart | Data | Site Details

Depth to Groundwater ▼

Date	Depth to Groundwater (Feet)	Measurement Issue
Aug 8, 2017	528.00	
Aug 3, 2017	445.00	
Apr 11, 2017	521.00	
Feb 4, 2017	510.00	
Feb 1, 2017	510.00	
Aug 23, 2016	453.00	
Sep 3, 2015	427.00	
Jun 2, 2015	531.00	
Aug 13, 2014	423.00	
May 15, 2012	406.00	

1 2

Start Date: End Date: Update Export

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Torrent Engineering and Equipment

Jun-02

Pipeline Volume Capacities

Nominal Diameter (inches)	Area (Sq. Inches)	Volume (per FT) (Cu. Inches)	(Cu. Feet)	Capacity (Gal/Ft)
2	3.1	38	0.02	0.2
3	7.1	85	0.05	0.4
4	12.6	151	0.09	0.7
6	28.3	339	0.20	1.5
8	50.3	603	0.35	2.6
10	78.5	942	0.55	4.1
12	113.1	1,357	0.79	5.9
14	153.9	1,847	1.07	8.0
16	201.1	2,413	1.40	10.4
18	254.5	3,054	1.77	13.2
20	314.2	3,770	2.18	16.3
24	452.4	5,429	3.14	23.5
30	706.9	8,482	4.91	36.7
36	1,017.9	12,215	7.07	52.9
48	1,809.6	21,715	12.57	94.0

Coordinates: 34.9295°N 119.5971°W

WIKIPEDIA

Cuyama Valley

Cuyama Valley

Rugged terrain surrounding the Cuyama Valley

Location of the Cuyama Valley in southern and central California: green areas are national forests and national parks

Area	300 square miles (780 km^2) [235]
	Geography
Location	California, United States
Population centers	Cuyama, New Cuyama, Ventucopa
Coordinates	34.9295°N 119.5971°W
Traversed by	State Route 166, State Route 33
Rivers	Cuyama River

The **Cuyama Valley** is a valley along the Cuyama River in central California, in northern Santa Barbara, southern San Luis Obispo, southwestern Kern, and northwestern Ventura counties.

It is a sparsely inhabited area containing two primary towns – Cuyama and New Cuyama, and also Ventucopa. The land is largely used for ranching, agriculture, and oil and gas production. California State Route 166 runs along most of the east/west length of the valley, connecting the Kern County and the southern San Joaquin Valley with Santa Maria and coastal Santa Barbara and San Luis Obispo Counties. State Route 33 runs north/south through the eastern end of the valley, connecting the southern San Joaquin Valley with Ojai and coastal Ventura County.

Contents

Geography

The valley encompasses an area of approximately 300 square miles (780 km^2). It is bounded on all sides by mountains: the Sierra Madre Mountains along the south and west, La Panza Range on the north, and Caliente Range along the northeast – all of the California Coast Ranges System; and the San Emigdio Mountains on the east – of the Transverse Ranges System.

The headwaters of the Cuyama River are just north of Pine Mountain Summit on State Route 33. The valley widens from the river's entry to a maximum width near the highway junction of Routes 166 and 33, near the corner of the four counties. Then it narrows again as the river flows west out of the valley through a narrow canyon between the Sierra Madre and La Panza ranges, to the Santa Maria Valley and its river mouth on the Pacific Ocean.

The agricultural fields are in the center of the valley, near the Cuyama Highway junction and the two primary towns, where the alluvium is rich and the valley is a wide floodplain.[1]

North of the major portion of the valley is the Caliente Range rises, over which is the Carrizo Plain, a much larger inland valley. To the southeast is the high backcountry of Ventura County, which includes the highest summit in the region, Mount Pinos and other features of the San Emigdio Mountains. The far eastern end of the valley the San Andreas Faultzone crosses, and forms a low jumble of hills which Route 166 passes over to reach the southwestern San Joaquin Valley, with Maricopa, I–5, and Bakersfield.

The Los Padres National Forest lands are adjacent to the Cuyama Valley on the south, east, and northwest sides. Much of the land to the northeast, including most of the Caliente Range, is managed by the U.S. Bureau of Land Management (BLM).

Geology

Geologically, the valley is an alluvium-filled synclinal basin, at an elevation of approximately 2,000 to 2,500 feet (600 to 800 meters). Most of the rocks are sedimentary, and the Miocene-age Monterey Formation outcrops to the south, in the foothills of the Sierra Madre. Pliocene and Pleistocene sedimentary formations occur in the foothills along the south side of the valley as well. The large Morales Thrust Fault separates the abruptly-rising block of the Caliente Range from the valley itself on the north. Scenic badlands occur in the upper reaches of the valley, north and northeast of Pine Mountain Summit; they are reachable from Route 33 via Lockwood Valley Road.[1][2]

Climate

The climate of the valley is semi-arid with hot summers and cool winters. Almost all precipitation occurs in the winter in the form of rain, although snow has fallen on occasion; only five inches of rain falls annually on the valley floor, making it the driest place in coastal Central California.[3] Since the valley is open to the sea, there is occasional marine influence. The principal native vegetation on the valley floor is grassland and scrub, with chaparral and oak woodland in the hills to the south.

History

The Nature Conservancy
Protecting nature. Preserving life.

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31 October 2019

Taylor Blakslee
Cuyama Basin Groundwater Sustainability Agency
4900 California Ave, Tower B, 2nd Floor
Bakersfield, CA 93309

Submitted via email: tblakslee@hgcpm.com

Re: Cuyama Basin Draft Groundwater Sustainability Plan

Dear Mr. Taylor Blakslee,

The Nature Conservancy (TNC) appreciates the opportunity to comment on the Final Draft of the Cuyama Basin Draft Groundwater Sustainability Plan (GSP) being prepared under the Sustainable Groundwater Management Act (SGMA). Please note that we have previously submitted comments on the Public Draft GSP in a letter dated 17 May 2019.

TNC as a Stakeholder Representative for the Environment

TNC is a global, nonprofit organization dedicated to conserving the lands and waters on which all life depends. We seek to achieve our mission through science-based planning and implementation of conservation strategies. For decades, we have dedicated resources to establishing diverse partnerships and developing foundational science products for achieving positive outcomes for people and nature in California. TNC was part of a stakeholder group formed by the Water Foundation in early 2014 to develop recommendations for groundwater reform and actively worked to shape and pass SGMA.

Our reason for engaging is simple: California's freshwater biodiversity is highly imperiled. We have lost more than 90 percent of our native wetland and river habitats, leading to precipitous declines in native plants and the populations of animals that call these places home. These natural resources are intricately connected to California's economy providing direct benefits through industries such as fisheries, timber and hunting, as well as indirect benefits such as clean water supplies. SGMA must be successful for us to achieve a sustainable future, in which people and nature can thrive within Cuyama region and California.

We believe that the success of SGMA depends on bringing the best available science to the table, engaging all stakeholders in robust dialog, providing strong incentives for beneficial outcomes and rigorous enforcement by the State of California.

Given our mission, we are particularly concerned about the inclusion of nature, as required, in GSPs. The Nature Conservancy has developed a suite of tools based on best available science to help GSAs, consultants, and stakeholders efficiently incorporate nature into GSPs. These tools and resources are available online at GroundwaterResourceHub.org. The Nature Conservancy's tools and resources are intended to reduce costs, shorten timelines, and increase benefits for both people and nature.

Addressing Nature's Water Needs *in GSPs*

SGMA requires that all beneficial uses and users, including environmental users of groundwater, be considered in the development and implementation of GSPs (Water Code § 10723.2).

The GSP Regulations include specific requirements to identify and consider groundwater dependent ecosystems (23 CCR §354.16(g)) when determining whether groundwater conditions are having potential effects on beneficial uses and users. GSAs must also assess whether sustainable management criteria may cause adverse impacts to beneficial uses, which include environmental uses, such as plants and animals. In addition, monitoring networks should be designed to detect potential adverse impacts to beneficial uses due to groundwater. Adaptive management is embedded within SGMA and provides a process to work toward sustainability over time by beginning with the best available information to make initial decisions, monitoring the results of those decision, and using data collected through monitoring to revise decisions in the future. Over time, GSPs should improve as data gaps are reduced and uncertainties addressed.

To help ensure that GSPs adequately address nature as required under SGMA, The Nature Conservancy has prepared a checklist (Attachment A) for GSAs and their consultants to use. The Nature Conservancy believes the following elements are foundational for 2020 GSP submittals. For detailed guidance on how to address the checklist items, please also see our publication, *GDEs under SGMA: Guidance for Preparing GSPs*[1].

1. Environmental Representation

SGMA requires that groundwater sustainability agencies (GSAs) consider the interests of all beneficial uses and users of groundwater. To meet this requirement, we recommend actively engaging environmental stakeholders by including environmental representation on the GSA board, technical advisory group, and/or working groups. This could include local staff from state and federal resource agencies, nonprofit organizations and other environmental interests. By engaging these stakeholders, GSAs will benefit from access to additional data and resources, as well as a more robust and inclusive GSP.

2. Basin GDE and ISW Maps

SGMA requires that groundwater dependent ecosystems (GDEs) and interconnected surface waters (ISWs) be identified in the GSP. We recommend using the Natural Communities Commonly Associated with Groundwater Dataset (NC Dataset) provided online[2] by the Department of Water Resources (DWR) as a starting point for the GDE map. The NC Dataset was developed through a collaboration between DWR, the Department of Fish and Wildlife and TNC.

3. Potential Effects on Environmental Beneficial Users

SGMA requires that potential effects on GDEs and environmental surface water users be described when defining undesirable results. In addition to identifying GDEs in the basin, The Nature Conservancy recommends identifying beneficial users of surface water, which include environmental users. This is a critical step, as it is impossible to define "significant and

[1]GDEs under SGMA: Guidance for Preparing GSPs is available at: https://groundwaterresourcehub.org/public/uploads/pdfs/GWR_Hub_GDE_Guidance_Doc_2-1-18.pdf

[2] The Department of Water Resources' Natural Communities Commonly Associated with Groundwater dataset is available at: *https://gis.water.ca.gov/app/NCDatasetViewer/*

unreasonable adverse impacts" without knowing *what* is being impacted. For your convenience, we've provided a list of freshwater species within the boundary of the Cuyama groundwater basin in Attachment C. Our hope is that this information will help your GSA better evaluate the impacts of groundwater management on environmental beneficial users of surface water. We recommend that after identifying which freshwater species exist in your basin, especially federal and state listed species, that you contact staff at the Department of Fish and Wildlife (DFW), United States Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Services (NMFS) to obtain their input on the groundwater and surface water needs of the organisms on the GSA's freshwater species list. We also refer you to the Critical Species Lookbook[3] prepared by The Nature Conservancy and partner organizations for additional background information on the water needs and groundwater reliance of critical species. Because effects to plants and animals are difficult and sometimes impossible to reverse, we recommend erring on the side of caution to preserve sufficient groundwater conditions to sustain GDEs and ISWs.

4. Biological and Hydrological Monitoring

If sufficient hydrological and biological data in and around GDEs is not available in time for the 2020/2022 plan, data gaps should be identified along with actions to reconcile the gaps in the monitoring network.

TNC has reviewed the Cuyama Basin Draft GSP and appreciates the work that has gone into the preparation of this plan. However, we consider it to be inadequate under SGMA since key environmental beneficial uses and users are not adequately identified and considered. In particular, ISWs and GDEs are not adequately identified and evaluated for ecological importance or adequately considered in the basin's sustainable management criteria. Please present a more thorough analysis of the identification and evaluation of ISWs and GDEs in subsequent drafts of the GSP.

Our comments related to the Cuyama Basin Draft GSP are provided in detail in Attachment B and are in reference to the numbered items in Attachment A. Attachment C provides a list of the freshwater species located in the Cuyama Basin. Attachment D describes six best practices that GSAs and their consultants can apply when using local groundwater data to confirm a connection to groundwater for DWR's Natural Communities Commonly Associated with Groundwater Dataset[2]. Attachment E provides an overview of a new, free online tool that allows GSAs to assess changes in groundwater dependent ecosystem (GDE) health using satellite, rainfall, and groundwater data.

Thank you for fully considering our comments as you develop your GSP.

Best Regards,

Sandi Matsumoto
Associate Director, California Water Program
The Nature Conservancy

[3] Available online at: https://groundwaterresourcehub.org/sgma-tools/the-critical-species-lookbook/

Attachment A

Considering Nature under SGMA: A Checklist

The Nature Conservancy is neither dispensing legal advice nor warranting any outcome that could result from the use of this checklist. Following this checklist does not guarantee approval of a GSP or compliance with SGMA, both of which will be determined by DWR and the State Water Resources Control Board.

GSP Plan Element*		GDE Inclusion in GSPs: Identification and Consideration Elements	Check Box
Admin Info	2.1.5 Notice & Communication *23 CCR §354.10*	Description of the types of environmental beneficial uses of groundwater that exist within GDEs and a description of how environmental stakeholders were engaged throughout the development of the GSP.	1
Planning Framework	2.1.2 to 2.1.4 Description of Plan Area *23 CCR §354.8*	Description of jurisdictional boundaries, existing land use designations, water use management and monitoring programs; general plans and other land use plans relevant to GDEs and their relationship to the GSP.	2
		Description of instream flow requirements, threatened and endangered species habitat, critical habitat, and protected areas.	3
		Summary of process for permitting new or replacement wells for the basin, and how the process incorporates any protection of GDEs	4
Basin Setting	2.2.1 Hydrogeologic Conceptual Model *23 CCR §354.14*	Basin Bottom Boundary: Is the bottom of the basin defined as at least as deep as the deepest groundwater extractions?	5
		Principal aquifers and aquitards: Are shallow aquifers adequately described, so that interconnections with surface water and vertical groundwater gradients with other aquifers can be characterized?	6
		Basin cross sections: Do cross-sections illustrate the relationships between GDEs, surface waters and principal aquifers?	7
	2.2.2 Current & Historical Groundwater Conditions *23 CCR §354.16*	Interconnected surface waters:	8
		Interconnected surface water maps for the basin with gaining and losing reaches defined (included as a figure in GSP & submitted as a shapefile on SGMA portal).	9
		Estimates of current and historical surface water depletions for interconnected surface waters quantified and described by reach, season, and water year type.	10
		Basin GDE map included (as figure in text & submitted as a shapefile on SGMA Portal).	11

		If NC Dataset *was* used:	Basin GDE map denotes which polygons were kept, removed, and added from NC Dataset (Worksheet 1, can be attached in GSP section 6.0).	12
			The basin's GDE shapefile, which is submitted via the SGMA Portal, includes two new fields in its attribute table denoting: 1) which polygons were kept/removed/added, and 2) the change reason (e.g., why polygons were removed).	13
			GDEs polygons are consolidated into larger units and named for easier identification throughout GSP.	14
		If NC Dataset *was not* used:	Description of why NC dataset was not used, and how an alternative dataset and/or mapping approach used is best available information.	15
		Description of GDEs included:		16
		Historical and current groundwater conditions and variability are described in each GDE unit.		17
		Historical and current ecological conditions and variability are described in each GDE unit.		18
		Each GDE unit has been characterized as having high, moderate, or low ecological value.		19
		Inventory of species, habitats, and protected lands for each GDE unit with ecological importance (Worksheet 2, can be attached in GSP section 6.0).		20
	2.2.3 Water Budget *23 CCR §354.18*	Groundwater inputs and outputs (e.g., evapotranspiration) of native vegetation and managed wetlands are included in the basin's historical and current water budget.		21
		Potential impacts to groundwater conditions due to land use changes, climate change, and population growth to GDEs and aquatic ecosystems are considered in the projected water budget.		22
Sustainable Management Criteria	3.1 Sustainability Goal *23 CCR §354.24*	Environmental stakeholders/representatives were consulted.		23
		Sustainability goal mentions GDEs or species and habitats that are of particular concern or interest.		24
		Sustainability goal mentions whether the intention is to address pre-SGMA impacts, maintain or improve conditions within GDEs or species and habitats that are of particular concern or interest.		25
	3.2 Measurable Objectives *23 CCR §354.30*	Description of how GDEs were considered and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment.		26
	3.3 Minimum Thresholds *23 CCR §354.28*	Description of how GDEs and environmental uses of surface water were considered when setting minimum thresholds for relevant sustainability indicators:		27
		Will adverse impacts to GDEs and/or aquatic ecosystems dependent on interconnected surface waters (beneficial user of surface water) be avoided with the selected minimum thresholds?		28
		Are there any differences between the selected minimum threshold and state, federal, or local standards relevant to the species or habitats residing in GDEs or aquatic ecosystems dependent on interconnected surface waters?		29
	3.4 Undesirable Results *23 CCR §354.26*	For GDEs, hydrological data are compiled and synthesized for each GDE unit:		30
		If hydrological data *are available* within/nearby the GDE	Hydrological datasets are plotted and provided for each GDE unit (Worksheet 3, can be attached in GSP Section 6.0).	31
			Baseline period in the hydrologic data is defined.	32

			GDE unit is classified as having high, moderate, or low susceptibility to changes in groundwater.	33
			Cause-and-effect relationships between groundwater changes and GDEs are explored.	34
		If hydrological data *are not available* within/nearby the GDE	Data gaps/insufficiencies are described.	35
			Plans to reconcile data gaps in the monitoring network are stated.	36
		For GDEs, biological data are compiled and synthesized for each GDE unit:		37
		Biological datasets are plotted and provided for each GDE unit, and when possible provide baseline conditions for assessment of trends and variability.		38
		Data gaps/insufficiencies are described.		39
		Plans to reconcile data gaps in the monitoring network are stated.		40
		Description of potential effects on GDEs, land uses and property interests:		41
		Cause-and-effect relationships between GDE and groundwater conditions are described.		42
		Impacts to GDEs that are considered to be "significant and unreasonable" are described.		43
		Known hydrological thresholds or triggers (e.g., instream flow criteria, groundwater depths, water quality parameters) for significant impacts to relevant species or ecological communities are reported.		44
		Land uses include and consider recreational uses (e.g., fishing/hunting, hiking, boating).		45
		Property interests include and consider privately and publicly protected conservation lands and opens spaces, including wildlife refuges, parks, and natural preserves.		46
Sustainable Management Criteria	3.5 Monitoring Network *23 CCR §354.34*	Description of whether hydrological data are spatially and temporally sufficient to monitor groundwater conditions for each GDE unit.		47
		Description of how hydrological data gaps and insufficiencies will be reconciled in the monitoring network.		48
		Description of how impacts to GDEs and environmental surface water users, as detected by biological responses, will be monitored and which GDE monitoring methods will be used in conjunction with hydrologic data to evaluate cause-and-effect relationships with groundwater conditions.		49
Projects & Mgmt Actions	4.0. Projects & Mgmt Actions to Achieve Sustainability Goal *23 CCR §354.44*	Description of how GDEs will benefit from relevant project or management actions.		50
		Description of how projects and management actions will be evaluated to assess whether adverse impacts to the GDE will be mitigated or prevented.		51

* In reference to DWR's GSP annotated outline guidance document, available at:
https://water.ca.gov/LegacyFiles/groundwater/sgm/pdfs/GD_GSP_Outline_Final_2016-12-23.pdf

Attachment B

TNC Evaluation of the Cuyama Basin Final Draft Groundwater Sustainability Plan

This attachment summarizes our comments on the Final Draft GSP for the Cuyama Basin. TNC previously submitted comments on the Public Draft GSP in a letter dated 17 May 2019. Where these comments have not yet been addressed, they are repeated here.

1.3.1 Description of Beneficial Uses and Users of Groundwater (p. 1-46 & 1-47)

[Checklist item #1]: Environmental users of groundwater, including groundwater dependent ecosystems (GDEs), are acknowledged as beneficial users of groundwater in the GSP. Other species that depend on interconnected surface waters exist in Cuyama Basin and therefore should be identified and described. For any species that are no longer present in the basin, please provide scientific rationale and data to support this claim.

The information on environmental users in the Cuyama basin is readily available and includes the data and data sources. Please refer to the following:

- Natural Communities Commonly Associated with Groundwater dataset (NC Dataset), which is provided by the Department of Water Resources and identifies potential GDEs - https://gis.water.ca.gov/app/NCDatasetViewer/
- In Fall 2018, The Nature Conservancy sent a list of freshwater species located in the Cuyama Basin, which is included as Attachment C of this letter. Please take particular note of the species with protected status.
- In addition to identifying and describing environmental beneficial users, SGMA requires that beneficial users be considered throughout the plan. The Nature Conservancy has identified each part of the GSP with this requirement. That list is available here: https://groundwaterresourcehub.org/importance-of-gdes/provisions-related-to-groundwater-dependent-ecosystems-in-the-groundwater-s. Please ensure that environmental beneficial users are addressed accordingly throughout the plan.

2.1.6 Basin Boundaries – Bottom of the Cuyama Basin (p. 2-26)

[Checklist item #5]: It is currently unclear how existing well depths compare with the depth of the upper member of the Morales Formation. According to DWR's Hydrogeologic Conceptual Model BMP[4], "the definable bottom of the basin should be at least as deep as the deepest groundwater extractions". Thus, groundwater extraction well depth data should also be included in the determination of the basin bottom. This will prevent the possibility of extractors with wells deeper than the basin boundary from claiming exemption of SGMA due to their well residing outside the vertical extent of the basin boundary.

2.1.7 Principal Aquifers and Aquitards (p. 2-26)

[Checklist item #6]: In paragraph 1, "The aquifer is considered to be continuous and unconfined with the exception of locally perched aquifers resulting from clays in the formation". Please provide more details on:

- the location of perched aquifers

[4]Available at: https://water.ca.gov/LegacyFiles/groundwater/sgm/pdfs/BMP_HCM_Final_2016-12-23.pdf

- whether perched aquifers are being used by domestic shallow wells, GDEs and/or are potentially interacting with surface water
- the vertical gradients between the perched aquifers and the recent and younger alluvium aquifers
- other aquifer characteristics that may be known (e.g., perched aquifer thickness, porosity, hydraulic conductivity)

2.2.8 Interconnected Surface Water Systems (p. 2-112)

[Checklist item #8]: The model results are demonstrating that the entire river is an interconnected surface water system ("surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted" 23 CCR §351(o)). Based on the annual average stream depletion by reach (Table 2-2), it appears that losing and gaining reaches of the Cuyama can be mapped. Please distinguish the gaining and losing reaches. The data provides seems to indicate:

- Gaining: Reach 1, Reach 3, Reach 6, Reach 8, Reach 9.
- Losing: Reach 2, Reach 4, Reach 5, Reach 7

2.2.9 Groundwater Dependent Ecosystems (p. 2-117)

SGMA requires that all beneficial uses and users, including GDEs, be considered in the development and implementation of GSPs (Water Code §10723.2). The GSP Regulations include specific requirements to identify (map) GDEs and consider them when determining whether groundwater conditions are having potential effects on beneficial uses and users. SGMA also requires an assessment of whether sustainable management criteria (including minimum thresholds and measurable objectives) may cause adverse impacts to beneficial uses, including GDEs, and that monitoring networks are designed to detect such impacts. Therefore, mapping GDEs is a critical first step for incorporating environmental considerations into GSPs.

[Checklist item #11]:

- It appears that the preliminary desktop analysis, completed by Woodard & Curran and documented in Appendix D of the draft GSP, resulted an excessive elimination − totaling two-thirds − of the NC dataset polygons mapped in the Cuyama Basin. In particular, the methods and field verification approach described in the draft GSP failed take groundwater levels into consideration. SGMA defines GDEs as "ecological communities and species that depend on *groundwater emerging from aquifers or on groundwater occurring near the ground surface*". We recommend that depth to groundwater contour maps are used to verify whether a connection to groundwater exists for polygons in the NC Dataset. Please refer to Appendix D of this letter for best practices for using groundwater data to verify a connection to groundwater.

More specific comments related to the desktop analysis approach (as described in Appendix D of the GSP) include:

- Inundation visible on aerial imagery − This method is inappropriate because it is not possible to know whether surface water is connected with groundwater by visually inspecting it with aerial imagery. For example, in some cases surface water can be

completely disconnected from groundwater, so in this scenario this approach would falsely suggest that NC dataset polygons are connected to groundwater. Similarly, if surface water is not present, this method would also falsely suggest that NC dataset polygons are not connected to groundwater if plant communities and the species they support are accessing groundwater beneath the surface. This method also fails to account for the fact that GDEs can rely on groundwater for some or all its water requirements, which in California often vary by season, and depend on the availability of alternative water sources (e.g., precipitation, river water, reservoir water, soil moisture in the vadose zone, groundwater, applied water, treated wastewater effluent, urban stormwater, irrigated return flow).

  - If aerial imagery is to be used, a range of dates should be selected to reflect the California's Mediterranean climate, seasonal variations and water year types.
  - Phreatophytes (groundwater-dependent vegetation) often rely on groundwater that is occurring near the ground surface via their rooting network. Because these sources of groundwater are not detectable using aerial imagery, the images should be compared with contoured groundwater levels to determine whether groundwater levels are close enough to vegetation root zones.
  - We suggest the methods be revised and clarified accordingly.

- Saturation visible on aerial imagery could indicate many different conditions, including standing water or saturated soils that may be ephemeral, intermittent, or permanent in nature. To help verify what the images actually indicate, this method should be coupled with more advanced remote sensing methods. Please clarify if this was the case.
- Dense riparian and/or wetland vegetation visible on aerial imagery can help identify potential GDEs but is not an appropriate method to screen for whether a polygon is supported by groundwater and in fact a GDE. The presence of sparse vegetation also does not preclude the possibility that vegetation are using groundwater. Many desert and semi-arid environments with sparse vegetation can still be groundwater dependent ecosystems.

More specific comments related to the GDE field validation approach (as described in Appendix D of the draft GSP):

- The removal of Probable Non-GDE 1 and Probable Non-GDE 2 was based on the presence of sandy, dry, and friable soils was not scientifically justified. The presence of this soil type does not preclude the possibility that the dominant plant species observed are reliant on groundwater at depths below the earth surface. For example, a rooting depth of 13 feet has been observed for Ericameria nauseosa and >4 feet for Eriogonum fasiculatum, and the capillary fringe associated with those rooting networks could be accessing groundwater from deeper depths, depending on the hydraulic conductivity of the substratum. For more rooting depth data, please refer to TNC's global rooting depth database, available at: https://groundwaterresourcehub.org/gde-tools/gde-rooting-depths-database-for-gdes/

[Checklist items #12 & 13]:

- Decisions to remove, keep, or add polygons from the NC dataset into a basin GDE map should be based on best available science in a manner that promotes transparency and accountability with stakeholders. Any polygons that are removed, added, or kept should be inventoried in the submitted shapefile to DWR, and mapped in the plan. We recommend revising Figure 2-64 to reflect these requirements.

[Checklist item #17]:

- Groundwater conditions within GDEs should be briefly described within the portion of the Basin Setting Section where GDEs are being identified. Please refer to Attachment E of this letter for details on a new, free online tool that enables groundwater sustainability agencies to assess historical and current trends of growth and moisture content in vegetation using 35 years of satellite imagery for all of the polygons in the NC dataset.

[Checklist item #19]:

- Not all GDEs are created equal. Some GDEs may contain legally protected species or ecologically rich communities, whereas other GDEs may be highly degraded with little conservation value. Including a description of the types of species (protected status, native versus non-native), habitat, and environmental beneficial uses (see Worksheet 2, p.74 of GDE Guidance Document) can be helpful in assigning an ecological value to the GDEs. Identifying an ecological value of each GDE can help prioritize limited resources when considering GDEs as well as prioritizing legally protected species or habitat that may need special consideration when setting sustainable management criteria.

3.2.1 Undesirable Results Statements - Chronic Lowering of Groundwater Levels (p. 3-2) and 3.3.1 Evaluation of Presence of Undesirable Results – Chronic Lowering of Groundwater Levels (p. 3-6)

[Checklist items #30-46]:

- Identification of Undesirable Results – significant adverse impacts to GDEs can occur if 30% of representative monitoring wells fall below their minimum groundwater elevation thresholds for two consecutive years. The proposed approach could work if management areas were established to "identify different minimum thresholds, measurable objectives, monitoring, or projects and management actions based on differences in water use sector, water source type, geology, aquifer characteristics, or other factors" [23 CCR §351(r)]. But, as it is written now, significant and unreasonable adverse impacts to GDEs could occur if the exceedance of minimum thresholds disproportionately occurs in representative monitoring wells close to GDEs (e.g., 3 out of the 60 wells minimum thresholds are exceeded for 3 years are causing adverse impacts to GDEs, but because the definition of undesirable results (18 out of 60 wells) is not met, there is no formal recognition that undesirable results are occurring). We recommend that groundwater levels that are protective of GDEs be considered when establishing minimum thresholds for groundwater levels across the basin. Please refer to Step 2 of *GDEs under SGMA: Guidance for Preparing GSPs*[1] for more details.

3.2.6 Undesirable Results Statements - Depletions of Interconnected Surface Water (p. 3-5)

[Checklist items #30-46]:

- Under the Potential Effects of Undesirable Results subsection, "If depletions of interconnected surface water were to reach Undesirable Results, groundwater dependent ecosystems could be affected" should also include potential effects on environmental surface water users, land uses (e.g., fishing/hunting, hiking, boating), and property interests (e.g., privately and publicly protected conservation lands and open spaces, including wildlife refuges, parks, and natural preserves) [23 CCR §354.26(b)(3)]. Please also provide more details on how these various beneficial users could be adversely affected. SGMA also requires that depletions of interconnected surface water also consider adverse impacts on beneficial uses of surface water [23 CCR 354.28(6)].
- In addition to identifying GDEs in the basin, The Nature Conservancy recommends identifying beneficial users of surface water, which include environmental users. This is a critical step, as it is impossible to define "significant and unreasonable adverse impacts" without knowing *what* is being impacted, nor is possible to monitor ISWs in a way that can "identify adverse impacts on beneficial uses of surface water" [23 CCR §354.34(c)(6)(D)]. For your convenience, we've provided a list of freshwater species within the boundary of the Cuyama Basin in Attachment C. Our hope is that this information will help your GSA better evaluate and monitor the impacts of groundwater management on environmental beneficial users of surface water. We recommend that after identifying which freshwater species exist in your basin, especially federal and state listed species, that you contact staff at the Department of Fish and Wildlife (DFW), United States Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Services (NMFS) to obtain their input on the groundwater and surface water needs of the organisms on the freshwater species list, and how best to monitor them. Because effects to plants and animals are difficult and sometimes impossible to reverse, we recommend erring on the side of caution to preserve sufficient groundwater conditions to sustain GDEs and ISWs.
- Please also provide more details on when, where, and how groundwater changes can adversely affect these various beneficial users. Are there particular species, with legal protection, that already have known thresholds that need special consideration? The more specific the definition of what an adverse impact to beneficial users of groundwater and surface water looks like, the easier it is to quantify minimum thresholds, measurable objectives, and interim milestones that are protective of that definition.

<u>3.3.6 Evaluation of the Presence of Undesirable Results - Depletions of Interconnected Surface Water (p. 3-8)</u>

[Checklist items #30-46]:

- Please be more specific on what measurements were used to show that groundwater gradients along interconnected surface water bodies in the Cuyama basin are not in an undesirable condition. How were these gradients determined?
- Analysis of Interconnected Surface Waters in Section 2.2.8, particularly Table 2.2, demonstrate that depletions of interconnected surface water are occurring, meaning that adverse impacts to beneficial uses and users could be occurring. Thus, it is inadequate to state that "depletion of interconnected surface water is not

identified to be in an undesirable condition**" without evaluating potential** effects to beneficial users.

4.5.4 Groundwater Level Monitoring Network – Representative Monitoring (p. 4-41 & 4-42)
[Checklist items #47-49]:

- Please identify which representative monitoring wells are capable of monitoring groundwater level conditions that can impact environmental beneficial users of groundwater (i.e., GDEs) and of surface water (e.g., freshwater aquatic species). Refer to Best Practice #4 in Attachment D to this letter for technical guidance.

4.10 Depletions of Interconnected Surface Water Monitoring Network (p. 4-66)
[Checklist items #47-49]:

- The improvement of numerical model accuracy for the estimation of interconnected surface waters should also include the installation of clustered or nested wells and the installation of shallow monitoring wells around GDEs and the Cuyama River to resolve data gaps that were identified in Section 2.2.10:
    - The Cuyama River is not gaged inside the Cuyama Basin, so flows of the river in the Basin have been estimated based on measurements at downstream gages.
    - Vertical gradients in the majority of the Basin are not understood due to the lack of wells with completions of different depths located near each other.
    - GDEs could be evaluated in greater detail
    - Information about many of the wells in the Basin is incomplete, and additional information is needed regarding well depths, perforation intervals and current status.
    - Due to sporadic monitoring by a variety of monitoring entities, a long period of record of monitoring groundwater levels does not exist in many areas in the Basin.
- Please identify appropriate biological indicators that can be used to monitor potential impacts to environmental beneficial users due to groundwater conditions. Refer to Appendix E of this letter for an overview of a free, new online tool for monitoring the health of GDEs over time.

5.2.2 Minimum Thresholds, Measurable Objectives, and Interim Milestones - Chronic Lowering of Groundwater Levels (p. 5-6 thru p. 5-9)
[Checklist items #26-29]:

- Selecting thresholds by using groundwater elevation measurements closest to (but not before) January 1, 2015 is inadequate for identifying minimum thresholds or measurable objectives. Relying solely on the SGMA benchmark date (January 1, 2015) or any other single point in time to characterize groundwater conditions fails to capture the seasonal and interannual variability typical of California's climate. Hydrology is not static. Measurable objectives are intended to be set with enough operational flexibility to permit seasonal and interannual fluctuations that occur in California. We recommend that you consider using a baseline approach to better capture seasonality and water year types.

- January 1, 2015 was at the height of California's historic drought, a period of time that was characterized by adverse impacts to domestic well owners (e.g., dry wells), GDEs (e.g., water stress impacts on growth, reproduction, and even mortality due to lack of groundwater), and surface water users (e.g., lower streamflows). The onus is on the GSA to determine whether groundwater conditions (due to groundwater pumping) exacerbated impacts to these beneficial users. And if so, to recognize these impacts and establish thresholds and measurable objectives that can avoid adverse impacts to beneficial users caused by groundwater in all water year types.
- While total well depth information is helpful in considering adverse impacts to beneficial users of groundwater (e.g., domestic, irrigation, and municipal wells), it fails to consider adverse impacts to GDEs and environmental beneficial users of surface water in interconnected surface waters. Environmental beneficial users of groundwater need to be considered when establishing measurable thresholds, measurable objectives, and interim milestones. Please refer to Step 2 of *GDEs under SGMA: Guidance for Preparing GSPs*[1] for how this can be accomplished.
- Please describe any differences between the selected minimum threshold and state, federal, or local standards relevant to the species or habitats residing in GDEs, as required [23 CCR §354.28 (b)(5)].

5.7 Minimum Thresholds, Measurable Objectives, and Interim Milestones - Depletions of Interconnected Surface Water (p. 5-26)

[Checklist items #26-29]:

- It is highly doubtful that January 1, 2015 surface water conditions can be **considered "normal" (2**nd sentence in 2nd paragraph); please provide data to substantiate this claim. January 1, 2015 was at the height of California's historic drought, a period of time that was characterized by adverse impacts to domestic well owners (e.g., dry wells), GDEs (e.g., water stress impacts on growth, reproduction, and even mortality due to lack of groundwater), and surface water users (e.g., lower streamflows).
- Please provide more data and an elaborated description on how current basin conditions have not varied from January 1, 2015 conditions.
- Even if current basin conditions may not have varied from January 1, 2015, the onus is on the GSA to determine whether groundwater conditions are causing any adverse impacts to beneficial users. And if so, to recognize these impacts and establish thresholds and measurable objectives that can avoid adverse impacts to beneficial users caused by groundwater in all water year types.
- According to Table 2-2 in the Draft GSP, 5994 AF of surface water was depleted in 2017:

Reach	Depletion in AF
2	19.9
3	300.4
4	67.8
5	906
7	4700.3
Total	5994.4

Please investigate whether these depletions in surface water are adversely impacting instream flow conditions and groundwater levels in riparian areas for environmental beneficial users, especially legally protected species.

- Please describe any differences between the selected minimum threshold and state, federal, or local standards relevant to the species or habitats residing in GDEs or aquatic ecosystems dependent on interconnected surface waters [23 CCR §354.28 (b)(5)].

7. Projects and Management Actions
[Checklist items #50 - 51]:

- Please describe how the projects described in this chapter and their benefits will help "maintain a sustainable groundwater resource for beneficial users of the Basin", including environmental users, as stated in the sustainability goal for the Cuyama Basin.
- For more case studies on how to incorporate environmental benefits into groundwater projects, please visit our website:
    - https://groundwaterresourcehub.org/case-studies/recharge-case-studies/

Attachment C

Freshwater Species Located in the Cuyama Basin

To assist in identifying the beneficial users of surface water necessary to assess the undesirable result "depletion of interconnected surface waters", Attachment C provides a list of freshwater species located in the Cuyama Basin. To produce the freshwater species list, we used ArcGIS to select features within the California Freshwater Species Database version 2.0.9 within the GSA's boundary. This database contains information on ~4,000 vertebrates, macroinvertebrates and vascular plants that depend on fresh water for at least one stage of their life cycle. The methods used to compile the California Freshwater Species Database can be found in Howard et al. 2015[5]. The spatial database contains locality observations and/or distribution information from ~400 data sources. The database is housed in the California Department of Fish and Wildlife's BIOS[6] as well as on The Nature Conservancy's science website[7].

Scientific Name	Common Name	Legal Protected Status		
		Federal	State	Other
BIRDS				
Actitis macularius	Spotted Sandpiper			
Agelaius tricolor	Tricolored Blackbird	Bird of Conservation Concern	Special Concern	BSSC - First priority
Anas americana	American Wigeon			
Anas crecca	Green-winged Teal			
Anas cyanoptera	Cinnamon Teal			
Anas discors	Blue-winged Teal			
Anas platyrhynchos	Mallard			
Anser albifrons	Greater White-fronted Goose			
Ardea alba	Great Egret			
Ardea herodias	Great Blue Heron			
Aythya collaris	Ring-necked Duck			
Butorides virescens	Green Heron			
Calidris alpina	Dunlin			
Calidris mauri	Western Sandpiper			
Calidris minutilla	Least Sandpiper			
Chen caerulescens	Snow Goose			
Cistothorus palustris palustris	Marsh Wren			
Egretta thula	Snowy Egret			
Empidonax traillii	Willow Flycatcher	Bird of Conservation Concern	Endangered	
Fulica americana	American Coot			
Gallinago delicata	Wilson's Snipe			
Haliaeetus leucocephalus	Bald Eagle	Bird of Conservation Concern	Endangered	
Himantopus mexicanus	Black-necked Stilt			
Limnodromus scolopaceus	Long-billed Dowitcher			
Megaceryle alcyon	Belted Kingfisher			
Numenius americanus	Long-billed Curlew			
Pelecanus erythrorhynchos	American White Pelican		Special Concern	BSSC - First priority
Phalacrocorax auritus	Double-crested Cormorant			
Phalaropus tricolor	Wilson's Phalarope			
Porzana carolina	Sora			

[5] Howard, J.K. et al. 2015. Patterns of Freshwater Species Richness, Endemism, and Vulnerability in California. PLoSONE, 11(7). Available at: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0130710
[6] California Department of Fish and Wildlife BIOS: https://www.wildlife.ca.gov/data/BIOS
[7] Science for Conservation: https://www.scienceforconservation.org/products/california-freshwater-species-database

Setophaga petechia	Yellow Warbler			BSSC - Second priority
Tachycineta bicolor	Tree Swallow			
Tringa melanoleuca	Greater Yellowlegs			
Tringa solitaria	Solitary Sandpiper			
Xanthocephalus xanthocephalus	Yellow-headed Blackbird		Special Concern	BSSC - Third priority
CRUSTACEANS				
Artemia franciscana	San Francisco Brine Shrimp			
Cyprididae fam.	Cyprididae fam.			
Hyalella spp.	Hyalella spp.			
FISH				
Gila orcutti	Arroyo chub		Special Concern	Vulnerable - Moyle 2013
Lavinia symmetricus symmetricus	Central California roach		Special Concern	Near-Threatened - Moyle 2013
Oncorhynchus mykiss - SCCC	South Central California coast steelhead	Threatened	Special Concern	Vulnerable - Moyle 2013
Oncorhynchus mykiss irideus	Coastal rainbow trout			Least Concern - Moyle 2013
Ptychocheilus grandis	Sacramento pikeminnow			Least Concern - Moyle 2013
HERPS				
Actinemys marmorata marmorata	Western Pond Turtle		Special Concern	ARSSC
Ambystoma californiense californiense	California Tiger Salamander	Threatened	Threatened	ARSSC
Anaxyrus boreas boreas	Boreal Toad			
Anaxyrus californicus	Arroyo Toad	Endangered	Special Concern	ARSSC
Pseudacris cadaverina	California Treefrog			ARSSC
Pseudacris regilla	Northern Pacific Chorus Frog			
Rana boylii	Foothill Yellow-legged Frog	Under Review in the Candidate or Petition Process	Special Concern	ARSSC
Rana draytonii	California Red-legged Frog	Threatened	Special Concern	ARSSC
Spea hammondii	Western Spadefoot	Under Review in the Candidate or Petition Process	Special Concern	ARSSC
Thamnophis couchii	Sierra Gartersnake			
Thamnophis hammondii hammondii	Two-striped Gartersnake		Special Concern	ARSSC
Thamnophis sirtalis sirtalis	Common Gartersnake			
INSECTS & OTHER INVERTS				
Agabus spp.	Agabus spp.			
Ambrysus mormon				Not on any status lists
Ambrysus spp.	Ambrysus spp.			
Ameletus spp.	Ameletus spp.			
Anacaena spp.	Anacaena spp.			
Anax junius	Common Green Darner			
Anax walsinghami	Giant Green Darner			
Apedilum spp.	Apedilum spp.			
Argia lugens	Sooty Dancer			
Argia nahuana	Aztec Dancer			
Argia spp.	Argia spp.			
Argia vivida	Vivid Dancer			
Baetidae fam.	Baetidae fam.			
Baetis adonis	A Mayfly			

Baetis spp.	Baetis spp.			
Belostomatidae fam.	Belostomatidae fam.			
Berosus spp.	Berosus spp.			
Brillia spp.	Brillia spp.			
Callibaetis spp.	Callibaetis spp.			
Capniidae fam.	Capniidae fam.			
Centroptilum spp.	Centroptilum spp.			
Chaetarthria ochra				Not on any status lists
Chaetarthria pallida				Not on any status lists
Chaetocladius spp.	Chaetocladius spp.			
Chironomidae fam.	Chironomidae fam.			
Cinygmula spp.	Cinygmula spp.			
Coenagrionidae fam.	Coenagrionidae fam.			
Corydalidae fam.	Corydalidae fam.			
Cricotopus spp.	Cricotopus spp.			
Culicidae fam.	Culicidae fam.			
Diamesa spp.	Diamesa spp.			
Dicrotendipes spp.	Dicrotendipes spp.			
Drunella coloradensis	A Mayfly			
Drunella spp.	Drunella spp.			
Enochrus carinatus				Not on any status lists
Enochrus cristatus				Not on any status lists
Enochrus hamiltoni				Not on any status lists
Enochrus piceus				Not on any status lists
Enochrus spp.	Enochrus spp.			
Ephemerella spp.	Ephemerella spp.			
Ephydridae fam.	Ephydridae fam.			
Eubrianax edwardsii				Not on any status lists
Eukiefferiella spp.	Eukiefferiella spp.			
Euryhapsis spp.	Euryhapsis spp.			
Gumaga spp.	Gumaga spp.			
Helochares normatus				Not on any status lists
Hydraena spp.	Hydraena spp.			
Hydrophilidae fam.	Hydrophilidae fam.			
Hydroporus spp.	Hydroporus spp.			
Hydropsyche spp.	Hydropsyche spp.			
Hydropsychidae fam.	Hydropsychidae fam.			
Hydroptila spp.	Hydroptila spp.			
Hydryphantidae fam.	Hydryphantidae fam.			
Ischnura cervula	Pacific Forktail			
Ischnura denticollis	Black-fronted Forktail			
Ischnura spp.	Ischnura spp.			
Isoperla spp.	Isoperla spp.			
Laccobius spp.	Laccobius spp.			
Lepidostoma spp.	Lepidostoma spp.			
Lestes congener	Spotted Spreadwing			
Libellula luctuosa	Widow Skimmer			
Libellula saturata	Flame Skimmer			
Libellulidae fam.	Libellulidae fam.			
Limnophyes spp.	Limnophyes spp.			
Mesocapnia spp.	Mesocapnia spp.			
Micrasema spp.	Micrasema spp.			
Micropsectra spp.	Micropsectra spp.			
Neoclypeodytes plicipennis				Not on any status lists
Ochthebius gruwelli				Not on any status lists
Oecetis spp.	Oecetis spp.			
Oreodytes spp.	Oreodytes spp.			

Orthocladius spp.	Orthocladius spp.			
Paltothemis lineatipes	Red Rock Skimmer			
Paracladopelma spp.	Paracladopelma spp.			
Parakiefferiella spp.	Parakiefferiella spp.			
Paraleptophlebia spp.	Paraleptophlebia spp.			
Parametriocnemus spp.	Parametriocnemus spp.			
Paraphaenocladius spp.	Paraphaenocladius spp.			
Paratendipes spp.	Paratendipes spp.			
Peltodytes simplex				Not on any status lists
Phaenopsectra spp.	Phaenopsectra spp.			
Physemus minutus				Not on any status lists
Plathemis lydia	Common Whitetail			
Plathemis subornata	Desert Whitetail			
Polypedilum spp.	Polypedilum spp.			
Postelichus spp.	Postelichus spp.			
Procladius spp.	Procladius spp.			
Progomphus borealis	Gray Sanddragon			
Prosimulium spp.	Prosimulium spp.			
Psectrocladius spp.	Psectrocladius spp.			
Pseudochironomus spp.	Pseudochironomus spp.			
Rheotanytarsus spp.	Rheotanytarsus spp.			
Sanfilippodytes spp.	Sanfilippodytes spp.			
Serratella spp.	Serratella spp.			
Simulium spp.	Simulium spp.			
Sperchon spp.	Sperchon spp.			
Sperchontidae fam.	Sperchontidae fam.			
Stictotarsus spp.	Stictotarsus spp.			
Stictotarsus striatellus				Not on any status lists
Sympetrum corruptum	Variegated Meadowhawk			
Taenionema spp.	Taenionema spp.			
Tanytarsus spp.	Tanytarsus spp.			
Telebasis salva	Desert Firetail			
Tinodes spp.	Tinodes spp.			
Tipulidae fam.	Tipulidae fam.			
Tricorythodes spp.	Tricorythodes spp.			
Tropisternus spp.	Tropisternus spp.			
Tvetenia spp.	Tvetenia spp.			
MOLLUSKS				
Physa spp.	Physa spp.			
PLANTS				
Alnus rhombifolia	White Alder			
Anemopsis californica	Yerba Mansa			
Bolboschoenus maritimus paludosus	NA			Not on any status lists
Carex senta	Western Rough Sedge			
Castilleja minor minor	Alkali Indian-paintbrush			
Cicuta maculata angustifolia	Spotted Water-hemlock			
Elatine californica	California Waterwort			
Eleocharis parishii	Parish's Spikerush			
Epilobium campestre	NA			Not on any status lists
Isolepis cernua	Low Bulrush			
Juncus macrophyllus	Longleaf Rush			
Juncus xiphioides	Iris-leaf Rush			
Mimulus guttatus	Common Large Monkeyflower			
Mimulus parishii	Parish's Monkeyflower			
Myosurus minimus	NA			
Perideridia parishii latifolia	Parish's Yampah			
Perideridia pringlei	Pringle's Yampah		Special	CRPR - 4.3
Phacelia distans	NA			
Platanus racemosa	California Sycamore			
Pluchea odorata odorata	Scented Conyza			
Rumex conglomeratus	NA			
Salix exigua exigua	Narrowleaf Willow			

Salix laevigata	Polished Willow			
Salix lasiandra lasiandra				Not on any status lists
Salix lasiolepis lasiolepis	Arroyo Willow			
Salix melanopsis	Dusky Willow			
Stachys albens	White-stem Hedge-nettle			
Veronica americana	American Speedwell			

Attachment D

The Nature Conservancy

July 2019

IDENTIFYING GDEs UNDER SGMA
Best Practices for using the NC Dataset

The Sustainable Groundwater Management Act (SGMA) requires that groundwater dependent ecosystems (GDEs) be identified in Groundwater Sustainability Plans (GSPs). As a starting point, the Department of Water Resources (DWR) is providing the Natural Communities Commonly Associated with Groundwater Dataset (NC Dataset) online[8] to help Groundwater Sustainability Agencies (GSAs), consultants, and stakeholders identify GDEs within individual groundwater basins. To apply information from the NC Dataset to local areas, GSAs should combine it with the best available science on local hydrology, geology, and groundwater levels to verify whether polygons in the NC dataset are likely supported by groundwater in an aquifer (Figure 1)[9]. This document highlights six best practices for using local groundwater data to confirm whether mapped features in the NC dataset are supported by groundwater.

[8] *NC Dataset Online Viewer:* https://gis.water.ca.gov/app/NCDatasetViewer/

[9] California Department of Water Resources (DWR). 2018. Summary of the "Natural Communities Commonly Associated with Groundwater" Dataset and Online Web Viewer. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Data-and-Tools/Files/Statewide-Reports/Natural-Communities-Dataset-Summary-Document.pdf

The NC Dataset identifies vegetation and wetland features that are good indicators of a GDE. The dataset is comprised of 48 publicly available state and federal datasets that map vegetation, wetlands, springs, and seeps commonly associated with groundwater in California[10]. It was developed through a collaboration between DWR, the Department of Fish and Wildlife, and The Nature Conservancy (TNC). TNC has also provided detailed guidance on identifying GDEs from the NC dataset[11] on the Groundwater Resource Hub[12], a website dedicated to GDEs.

BEST PRACTICE #1. Establishing a Connection to Groundwater

Groundwater basins can be comprised of one continuous aquifer (Figure 2a) or multiple aquifers stacked on top of each other (Figure 2b). In unconfined aquifers (Figure 2a), using the depth-to-groundwater and the rooting depth of the vegetation is a reasonable method to infer groundwater dependence for GDEs. If groundwater is well below the rooting (and capillary) zone of the plants and any wetland features, the ecosystem is considered disconnected and groundwater management is not likely to affect the ecosystem (Figure 2d). However, it is important to consider local conditions (e.g., soil type, groundwater flow gradients, and aquifer parameters) and to review groundwater depth data from multiple seasons and water year types (wet and dry) because intermittent periods of high groundwater levels can replenish perched clay lenses that serve as the water source for GDEs (Figure 2c). Maintaining these natural groundwater fluctuations are important to sustaining GDE health.

Basins with a stacked series of aquifers (Figure 2b) may have varying levels of pumping across aquifers in the basin, depending on the production capacity or water quality associated with each aquifer. If pumping is concentrated in deeper aquifers, SGMA still requires GSAs to sustainably manage groundwater resources in shallow aquifers, such as perched aquifers, that support springs, surface water, domestic wells, and GDEs (Figure 2). This is because vertical groundwater gradients across aquifers may result in pumping from deeper aquifers to cause adverse impacts onto beneficial users reliant on shallow aquifers or interconnected surface water. The goal of SGMA is to sustainably manage groundwater resources for current and future social, economic, and environmental benefits. While groundwater pumping may not be currently occurring in a shallower aquifer, use of this water may become more appealing and economically viable in future years as pumping restrictions are placed on the deeper production aquifers in the basin to meet the sustainable yield and criteria. Thus, identifying GDEs in the basin should done irrespective to the amount of current pumping occurring in a particular aquifer, so that future impacts on GDEs due to new production can be avoided. A good rule of thumb to follow is: *if groundwater can be pumped from a well - it's an aquifer*.

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[10] *For more details on the mapping methods, refer to: Klausmeyer, K., J. Howard, T. Keeler-Wolf, K. Davis-Fadtke, R. Hull, A. Lyons. 2018. Mapping Indicators of Groundwater Dependent Ecosystems in California: Methods Report. San Francisco, California. Available at: https://groundwaterresourcehub.org/public/uploads/pdfs/iGDE_data_paper_20180423.pdf*

[11] "Groundwater Dependent Ecosystems under the Sustainable Groundwater Management Act: Guidance for Preparing Groundwater Sustainability Plans" is available at: https://groundwaterresourcehub.org/gde-tools/gsp-guidance-document/

[12] *The Groundwater Resource Hub: www.GroundwaterResourceHub.org*

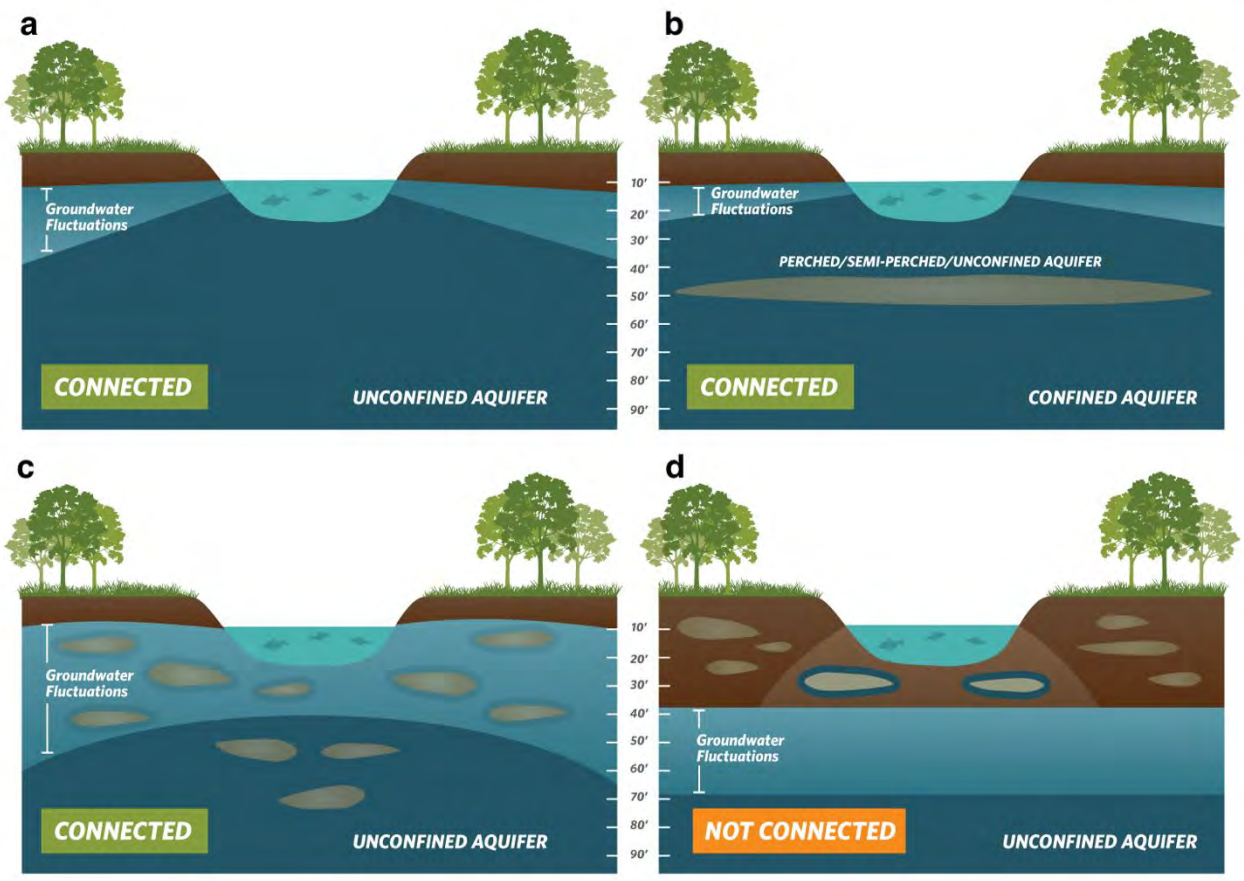


Figure 2. Confirming whether an ecosystem is connected to groundwater. Top: (a) Under the ecosystem is an unconfined aquifer with depth-to-groundwater fluctuating seasonally and interannually within 30 feet from land surface. (b) Depth-to-groundwater in the shallow aquifer is connected to overlying ecosystem. Pumping predominately occurs in the confined aquifer, but pumping is possible in the shallow aquifer. Bottom: (c) Depth-to-groundwater fluctuations are seasonally and interannually large, however, clay layers in the near surface prolong the ecosystem's connection to groundwater. (d) Groundwater is disconnected from surface water, and any water in the vadose (unsaturated) zone is due to direct recharge from precipitation and indirect recharge under the surface water feature. These areas are not connected to groundwater and typically support species that do not require access to groundwater to survive.

BEST PRACTICE #2. Characterize Seasonal and Interannual Groundwater Conditions

SGMA requires GSAs to describe current and historical groundwater conditions when identifying GDEs [23 CCR §354.16(g)]. Relying solely on the SGMA benchmark date (January 1, 2015) or any other single point in time to characterize groundwater conditions (e.g., depth-to-groundwater) is inadequate because managing groundwater conditions with data from one time point fails to capture the seasonal and interannual variability typical of California's climate. DWR's Best Management Practices document on water budgets[13] recommends using 10 years of water supply and water budget information to describe how historical conditions have impacted the operation of the basin within sustainable yield, implying that a baseline[14] could be determined based on data between 2005 and 2015. Using this or a similar time period, depending on data availability, is recommended for determining the depth-to-groundwater.

GDEs depend on groundwater levels being close enough to the land surface to interconnect with surface water systems or plant rooting networks. The most practical approach[15] for a GSA to assess whether polygons in the NC dataset are connected to groundwater is to rely on groundwater elevation data. As detailed in TNC's GDE guidance document[4], one of the key factors to consider when mapping GDEs is to contour depth-to-groundwater in the aquifer that is supporting the ecosystem (see Best Practice #5).

Groundwater levels fluctuate over time and space due to California's Mediterranean climate (dry summers and wet winters), climate change (flood and drought years), and subsurface heterogeneity in the subsurface (Figure 3). Many of California's GDEs have adapted to dealing with intermittent periods of water stress, however if these groundwater conditions are prolonged, adverse impacts to GDEs can result. While depth-to-groundwater levels within 30 feet[4] of the land surface are generally accepted as being a proxy for confirming that polygons in the NC dataset are supported by groundwater, it is highly advised that fluctuations in the groundwater regime be characterized to understand the seasonal and interannual groundwater variability in GDEs. Utilizing groundwater data from one point in time can misrepresent groundwater levels required by GDEs, and inadvertently result in adverse impacts to the GDEs. Time series data on groundwater elevations and depths are available on the SGMA Data Viewer[16]. However, if insufficient data are available to describe groundwater conditions within or near polygons from the NC dataset, include those polygons in the GSP until data gaps are reconciled in the monitoring network (see Best Practice #6).

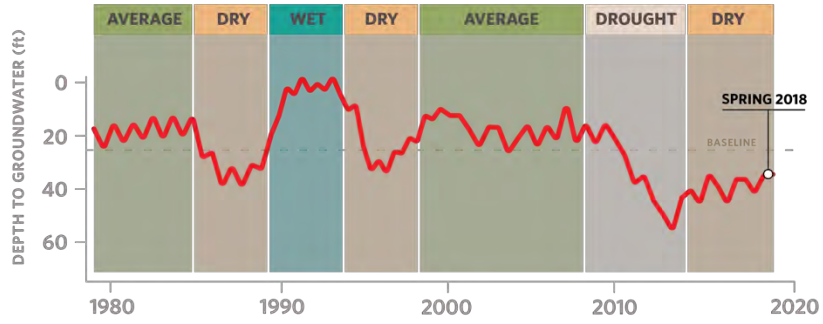


Figure 3. Example seasonality and interannual variability in depth-to-groundwater over time. Selecting one point in time, such as Spring 2018, to characterize groundwater conditions in GDEs fails to capture what groundwater conditions are necessary to maintain the ecosystem status into the future so adverse impacts are avoided.

[13] DWR. 2016. Water Budget Best Management Practice. Available at: https://water.ca.gov/LegacyFiles/groundwater/sgm/pdfs/BMP_Water_Budget_Final_2016-12-23.pdf

[14] *Baseline is defined under the GSP regulations as "historic information used to project future conditions for hydrology, water demand, and availability of surface water and to evaluate potential sustainable management practices of a basin." [23 CCR §351(e)]*

[15] Groundwater reliance can also be confirmed via stable isotope analysis and geophysical surveys. For more information see The GDE Assessment Toolbox (Appendix IV, GDE Guidance Document for GSPs[4]).

[16] *SGMA Data Viewer: https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer*

BEST PRACTICE #3. Ecosystems Often Rely on Both Groundwater and Surface Water

GDEs are plants and animals that rely on groundwater for all or some of its water needs, and thus can be supported by multiple water sources. The presence of non-groundwater sources (e.g., surface water, soil moisture in the vadose zone, applied water, treated wastewater effluent, urban stormwater, irrigated return flow) within and around a GDE does not preclude the possibility that it is supported by groundwater, too. SGMA defines GDEs as "ecological communities and species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface" [23 CCR §351(m)]. Hence, depth-to-groundwater data should be used to identify whether NC polygons are supported by groundwater and should be considered GDEs. In addition, SGMA requires that significant and undesirable adverse impacts to beneficial users of surface water be avoided. Beneficial users of surface water include environmental users such as plants or animals[17], which therefore must be considered when developing minimum thresholds for depletions of interconnected surface water.

GSAs are only responsible for impacts to GDEs resulting from groundwater conditions in the basin, so if adverse impacts to GDEs result from the diversion of applied water, treated wastewater, or irrigation return flow away from the GDE, then those impacts will be evaluated by other permitting requirements (e.g., CEQA) and may not be the responsibility of the GSA. However, if adverse impacts occur to the GDE due to changing groundwater conditions resulting from pumping or groundwater management activities, then the GSA would be responsible (Figure 4).

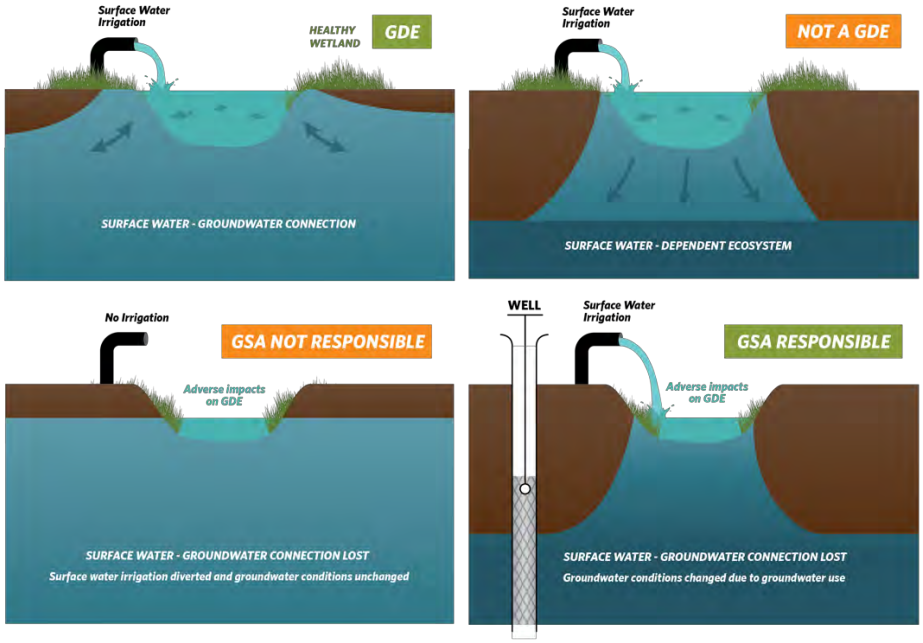


Figure 4. Ecosystems often depend on multiple sources of water. Top: (Left) Surface water and groundwater are interconnected, meaning that the GDE is supported by both groundwater and surface water. (Right) Ecosystems that are only reliant on non-groundwater sources are not groundwater-dependent. Bottom: (Left) An ecosystem that was once dependent on an interconnected surface water, but loses access to groundwater solely due to surface water diversions may not be the GSA's responsibility. (Right) Groundwater dependent ecosystems once dependent on an interconnected surface water system, but loses that access due to groundwater pumping is the GSA's responsibility.

[17] *For a list of environmental beneficial users of surface water by basin, visit: https://groundwaterresourcehub.org/gde-tools/environmental-surface-water-beneficiaries/*

BEST PRACTICE #4. Select Representative Groundwater Wells

Identifying GDEs in a basin requires that groundwater conditions are characterized to confirm whether polygons in the NC dataset are supported by the underlying aquifer. To do this, proximate groundwater wells should be identified to characterize groundwater conditions (Figure 5). When selecting representative wells, it is particularly important to consider the subsurface heterogeneity around NC polygons, especially near surface water features where groundwater and surface water interactions occur around heterogeneous stratigraphic units or aquitards formed by fluvial deposits. The following selection criteria can help ensure groundwater levels are representative of conditions within the GDE area:

- Choose wells that are within 5 kilometers (3.1 miles) of each NC Dataset polygons because they are more likely to reflect the local conditions relevant to the ecosystem. If there are no wells within 5km of the center of a NC dataset polygon, then there is insufficient information to remove the polygon based on groundwater depth. Instead, it should be retained as a potential GDE until there are sufficient data to determine whether or not the NC Dataset polygon is supported by groundwater.

- Choose wells that are screened within the surficial unconfined aquifer and capable of measuring the true water table.

- Avoid relying on wells that have insufficient information on the screened well depth interval for excluding GDEs because they could be providing data on the wrong aquifer. This type of well data should not be used to remove any NC polygons.

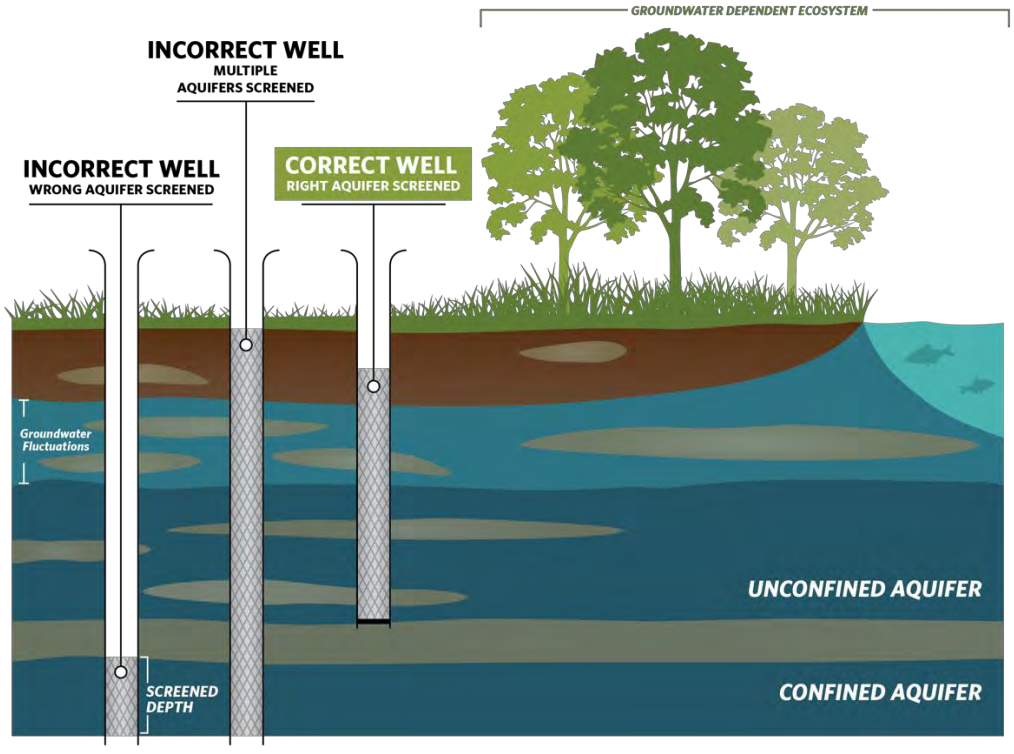


Figure 5. Selecting representative wells to characterize groundwater conditions near GDEs.

BEST PRACTICE #5. Contouring Groundwater Elevations

The common practice to contour depth-to-groundwater over a large area by interpolating measurements at monitoring wells is unsuitable for assessing whether an ecosystem is supported by groundwater. This practice causes errors when the land surface contains features like stream and wetland depressions because it assumes the land surface is constant across the landscape and depth-to-groundwater is constant below these low-lying areas (Figure 6a). A more accurate approach is to interpolate groundwater elevations at monitoring wells to get groundwater elevation contours across the landscape. This layer can then be subtracted from land surface elevations from a Digital Elevation Model (DEM)[18] to estimate depth-to-groundwater contours across the landscape (Figure b; Figure 7). This will provide a much more accurate contours of depth-to-groundwater along streams and other land surface depressions where GDEs are commonly found.

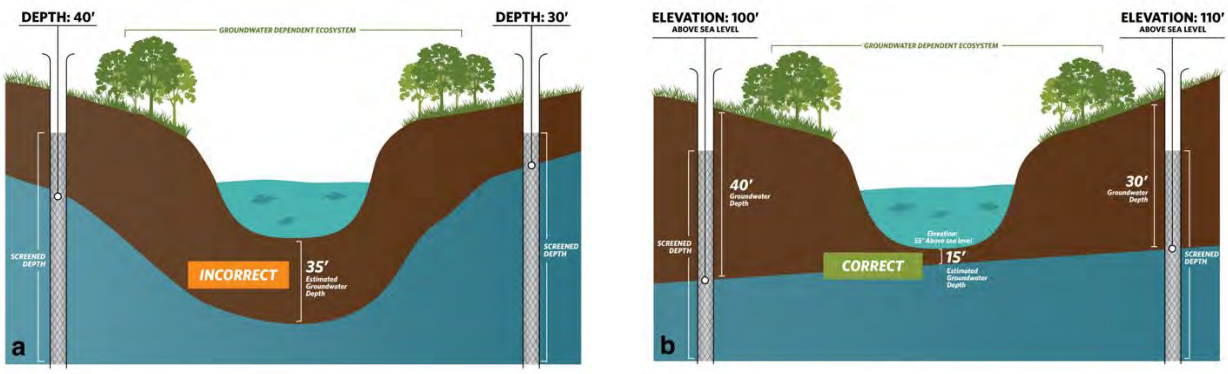


Figure 6. Contouring depth-to-groundwater around surface water features and GDEs. (a) Groundwater level interpolation using depth-to-groundwater data from monitoring wells. (b) Groundwater level interpolation using groundwater elevation data from monitoring wells and DEM data.

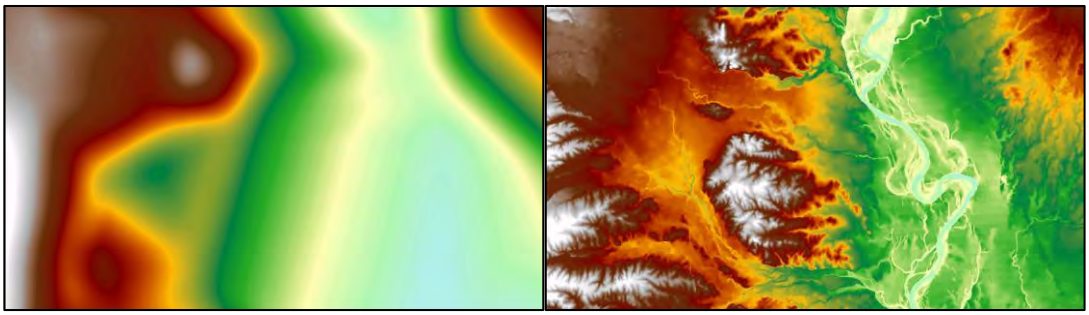


Figure 7. Depth-to-groundwater contours in Northern California. (Left) Contours were interpolated using depth-to-groundwater measurements determined at each well. (Right) Contours were determined by interpolating groundwater elevation measurements at each well and superimposing ground surface elevation from DEM spatial data to generate depth-to-groundwater contours. The image on the right shows a more accurate depth-to-groundwater estimate because it takes the local topography and elevation changes into account.

[18] USGS Digital Elevation Model data products are described at: https://www.usgs.gov/core-science-systems/ngp/3dep/about-3dep-products-services and can be downloaded at: https://iewer.nationalmap.gov/basic/

BEST PRACTICE #6. Best Available Science

Adaptive management is embedded within SGMA and provides a process to work toward sustainability over time by beginning with the best available information to make initial decisions, monitoring the results of those decisions, and using the data collected through monitoring programs to revise decisions in the future. In many situations, the hydrologic connection of NC dataset polygons will not initially be clearly understood if site-specific groundwater monitoring data are not available. If sufficient data are not available in time for the 2020/2022 plan, The Nature Conservancy strongly advises that questionable polygons from the NC dataset be included in the GSP until data gaps are reconciled in the monitoring network. Erring on the side of caution will help minimize inadvertent impacts to GDEs as a result of groundwater use and management actions during SGMA implementation.

KEY DEFINITIONS

Groundwater basin is an aquifer or stacked series of aquifers with reasonably well-defined boundaries in a lateral direction, based on features that significantly impede groundwater flow, and a definable bottom. *23 CCR §341(g)(1)*

Groundwater dependent ecosystem (GDE) are ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface. *23 CCR §351(m)*

Interconnected surface water (ISW) surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted. *23 CCR §351(o)*

Principal aquifers are aquifers or aquifer systems that store, transmit, and yield significant or economic quantities of groundwater to wells, springs, or surface water systems. *23 CCR §351(aa)*

ABOUT US

The Nature Conservancy is a science-based nonprofit organization whose mission is *to conserve the lands and waters on which all life depends*. To support successful SGMA implementation that meets the future needs of people, the economy, and the environment, TNC has developed tools and resources (www.groundwaterresourcehub.org) intended to reduce costs, shorten timelines, and increase benefits for both people and nature.

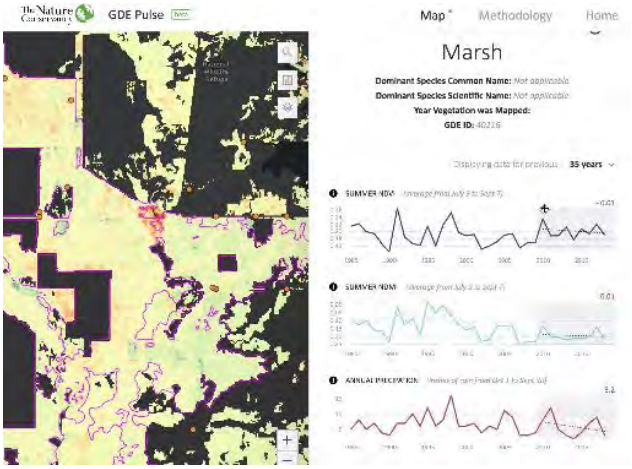
Attachment E

GDE Pulse

A new, free online tool that allows Groundwater Sustainability Agencies to assess changes in groundwater dependent ecosystem (GDE) health using satellite, rainfall, and groundwater data.

The Nature Conservancy
Protecting nature. Preserving life.®

Visit
https://gde.codefornature.org/



Remote sensing data from satellites has been used to monitor the health of vegetation all over the planet. GDE pulse has compiled 35 years of satellite imagery from NASA's Landsat mission for every polygon in the Natural Communities Commonly Associated with Groundwater Dataset[19]. The following datasets are included:

Normalized Difference Vegetation Index (NDVI) is a satellite-derived index that represents the greenness of vegetation. Healthy green vegetation tends to have a higher NDVI, while dead leaves have a lower NDVI. We calculated the average NDVI during the driest part of the year (July - Sept) to estimate vegetation health when the plants are most likely dependent on groundwater.

Normalized Difference Moisture Index (NDMI) is a satellite-derived index that represents water content in vegetation. NDMI is derived from the Near-Infrared (NIR) and Short-Wave Infrared (SWIR) channels. Vegetation with adequate access to water tends to have higher NDMI, while vegetation that is water stressed tends to have lower NDMI. We calculated the average NDVI during the driest part of the year (July–September) to estimate vegetation health when the plants are most likely dependent on groundwater.

Annual Precipitation is the total precipitation for the water year (October 1st – September 30th) from the PRISM dataset[20]. The amount of local precipitation can affect vegetation with more precipitation generally leading to higher NDVI and NDMI.

Depth to Groundwater measurements provide an indication of the groundwater levels and changes over time for the surrounding area. We used groundwater well measurements from nearby (<1km) wells to estimate the depth to groundwater below the GDE based on the average elevation of the GDE (using a digital elevation model) minus the measured groundwater surface elevation.

[19] The Natural Communities Commonly Associated with Groundwater Dataset is hosted on the California Department of Water Resources' website: https://gis.water.ca.gov/app/NCDatasetViewer/#

[20] The PRISM dataset is hosted on Oregon State University's website: http://www.prism.oregonstate.edu/

1 November 2019

MEMORANDUM

To: Taylor Blakslee, Cuyama Basin Groundwater Sustainability Agency

From: Jeff Shaw, P.G., C.Hg., EKI Environment & Water, Inc. (EKI)
John L. Fio, EKI
David A. Leighton, EKI

Subject: Comments on Some Aspects of the Cuyama Basin Water Resources Model, Cuyama Basin Groundwater Sustainability Plan
(EKI B70069.01)

EKI has prepared this brief outline of selected preliminary findings from our ongoing review of the transient 3-D numerical finite-element groundwater flow model known as the Cuyama Basin Water Resources Model (CBWRM or "the model"), which was constructed to support the Groundwater Sustainability Plan (GSP) for the Cuyama Basin Groundwater Sustainability Agency (GSA). Woodard & Curran (WC) provided model input files for the historical and future projection periods, and for scenarios representing projects and management actions, including pumping reductions. EKI used these files as-received, with no modifications, to run the CBWRM and attempt to reproduce certain model results published in the GSP. Our comments on certain aspects of the model are listed below, with further explanation on following pages.

SUMMARY OF COMMENTS

1. Projected future drawdown contours (and thus Management Area boundaries) published in the GSP are not reproducible using the model files and procedures provided by WC.
2. The model requires additional review and potential modification before it can be used by basin stakeholders as a groundwater management tool.
3. Long-term decisions such as the extent of areas where groundwater pumping is restricted should not be based solely on model output in its current form.
4. Management Area boundaries are delineated based on estimates of land use and pumping rates. Thus, they incorporate any errors and uncertainty in these parameters. For example, an error in estimated pumping of 1,000 AF can change the area within Management Areas by 600 to 800 acres.
5. The most sensitive model parameter in terms of its effect on estimated groundwater storage is groundwater pumping, which is not well-defined currently, and is not explicitly modeled in the Basin. Groundwater is assumed in the model to be extracted evenly from beneath the land over which it is used for irrigation. Simulation of pumping wells in their actual locations likely would improve model performance.
6. The model was calibrated without an explicitly-modeled vadose zone, which would influence model calibration and as a result alter model-calculated changes in water levels and groundwater storage.

MANAGEMENT AREAS

The public-review draft Cuyama Basin GSP defines proposed Management Areas within the basin based on "the model's projection of groundwater levels decreasing at a rate of 2 feet or more per year over a 50-year hydrologic period." Proposed Management Area boundaries define properties which will be required to reduce groundwater pumping, by as much as 67%, from all other lands where pumping currently is planned to remain unrestricted. Hence, Management Area boundaries are critically important for implementing basin management decisions.

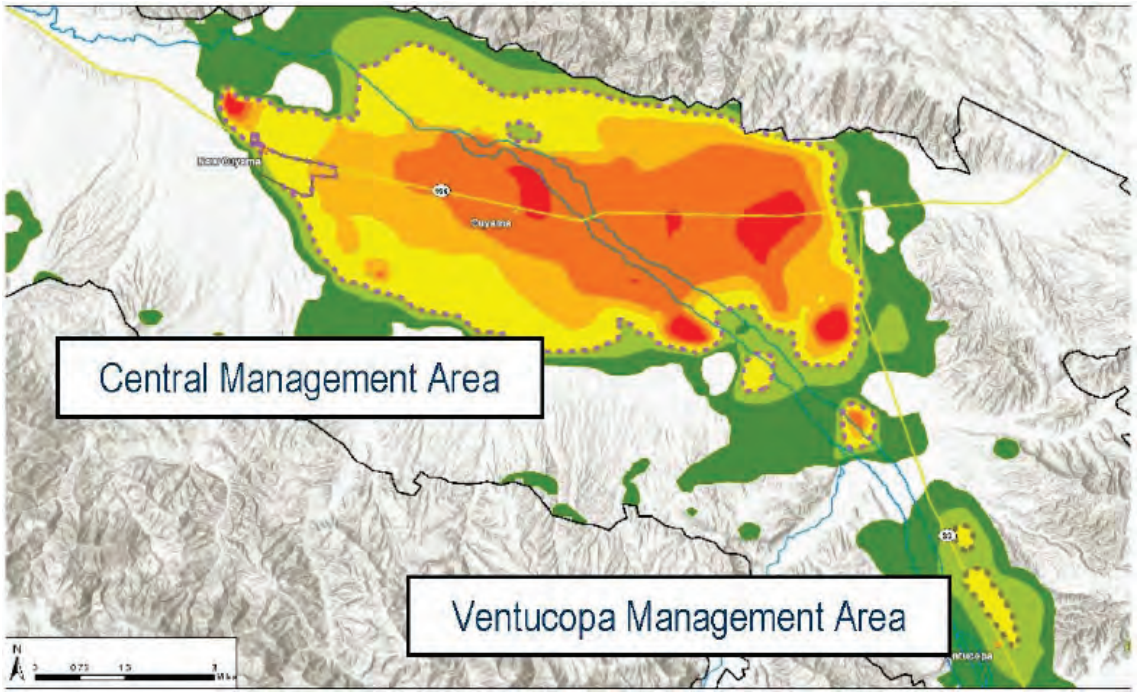


Figure 1. Groundwater Sustainability Plan proposed Management Area boundaries, Cuyama Basin (from Figure 7-1, *Cuyama Valley Groundwater Basin Draft Groundwater Sustainability Plan,* June 2019).

REPRODUCIBILITY OF MODEL RESULTS

EKI attempted to reproduce the Management Area boundaries using the provided model files and the post-processing steps described by WC. EKI could not reproduce the Management Area boundaries published in the GSP. Geographic Information System (GIS) shapefiles provided by WC that delineate the Management Area boundaries agree with the GSP, but EKI's model results, using the un-modified input files provided by WC and the post-processing steps described by WC, do not.

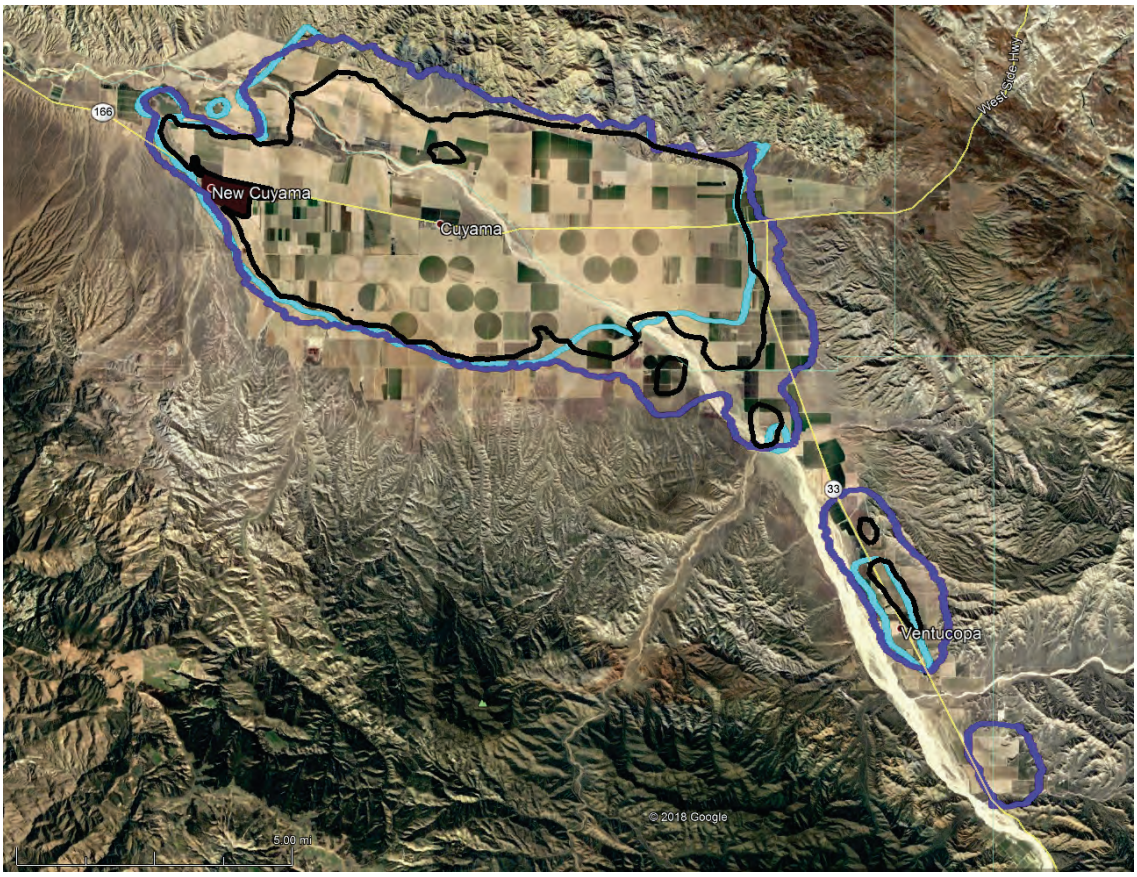


Figure 2. Groundwater Sustainability Plan proposed Management Area boundaries and model-generated contours, Cuyama Basin.

Preliminary output from the CBWRM is shown in Figure 2. The GSP-proposed Management Area boundaries are shown in black. The average 2-ft/yr drawdown contour EKI derived from the 50-year projected groundwater conditions is shown for model layer 2 (the Older Alluvium) in light blue, and for model layer 3 (the Upper Morales Formation) in purple.

Neither model-generated polygon agrees with the boundary proposed in the GSP, and WC has not yet confirmed how post-processing of results from each layer was conducted to obtain the Management Area boundaries proposed in the GSP.

The main part of the Central Basin Management Area (excluding smaller detached areas or the apparently excluded area in the interior) encompasses roughly 22,000 acres, whereas the corresponding area defined by EKI's model results using the input data provided by WC encompass about 25,000 acres in layer 2, and about 31,000 acres in layer 3. Thus, as much as 9,000 acres of land cannot be definitively classified as within or outside the proposed Central Basin Management Area as described in the GSP. Substantial discrepancies also are visible in the Ventucopa Management Area boundaries.

UNCERTAINTY IN MODELING OF MANAGEMENT AREAS

The Management Areas, as defined by the 2-ft/yr drawdown contour line are dependent upon the modeled pumping rate, a parameter that is subject to significant uncertainty given the lack of available pumping data.

A simple calculation illustrates the point. Basin Management Areas vary in size as a function of pumping. The ratio of the change in pumping (as estimated in the model) to the change in area enclosed by the 2-ft/yr drawdown contour indicates that Management Areas grow and shrink at the ratio of 0.6 acres or 0.8 acres of area for layers 2 and 3, respectively, per acre-foot of pumping change in the model.

Thus, even if the assumed total-basin pumping rate used for model input is known to an accuracy and precision of 1,000 AF (an optimistic scenario), parcels assigned to Management Areas through model output still could be incorrect by as much as 800 acres.

Compounding this problem, the model (as currently implemented) does not explicitly simulate supply wells pumping groundwater at specific locations and depths. Instead, pumping is estimated from the calculated applied water demand and land-use (crop) assumptions. Thus, the model implicitly assumes groundwater is always withdrawn from beneath the parcels where the water is applied. Groundwater piped from supply wells to irrigate fields some distance away therefore is not accurately simulated using the current model, and the drawdown effects of these wells are not captured by the model.

SENSITIVITY OF MODEL GROUNDWATER STORAGE ESTIMATES TO PUMPING UNCERTAINTY

The GSP states that simulated pumping is the most sensitive parameter in the entire model. Thus, any uncertainty in the pumping assumptions fed into the model will cause even greater uncertainty in the estimates of groundwater storage calculated by the model. The GSP notes[1] that a +/- 20% change in simulated groundwater pumping causes the model to change its modeled groundwater storage estimates by at least +/- 45%.

CALIBRATION OF MODEL WITHOUT VADOSE ZONE GROUNDWATER MOVEMENT

The model was calibrated without representing the time delay for water percolating past plant roots to travel through the unsaturated soil zone (vadose zone), which can be hundreds of feet thick in some areas of the Basin. Groundwater percolating downward through the vadose zone can require decades before reaching the water table. Age-dating results reported by the USGS show that water samples from wells can be very old (up to thousands of years) in parts of the basin. The rationale for ignoring the vadose zone is not documented in the GSP, but it can substantially influence the magnitude and timing of recharge, and pumping effects on groundwater storage changes.

Figure 3 shows an example of two possible future projected hydrographs from a well (OPTI 612) located near the center of the Central Basin Management Area. The simulations used to create the

[1] Table C-4: Sensitivity of Basin-wide Storage Change to Different Parameters, *Cuyama Valley Groundwater Basin Draft Groundwater Sustainability Plan*, Appendices Chapter 2, Appendix C, June 2019

hydrographs were (1) the unaltered model files (as provided) with no explicit vadose zone simulation, and (2) the same input files but with the vadose zone active.

The hydrographs are similar in shape, but model-calculated water levels are about 50 to 100 feet lower than measured water levels when the vadose zone is included. This discrepancy shows that a substantially different set of aquifer parameter values are needed to improve the match between measured and simulated water levels, which in turn will alter the modeled groundwater storage response to changes in pumping.

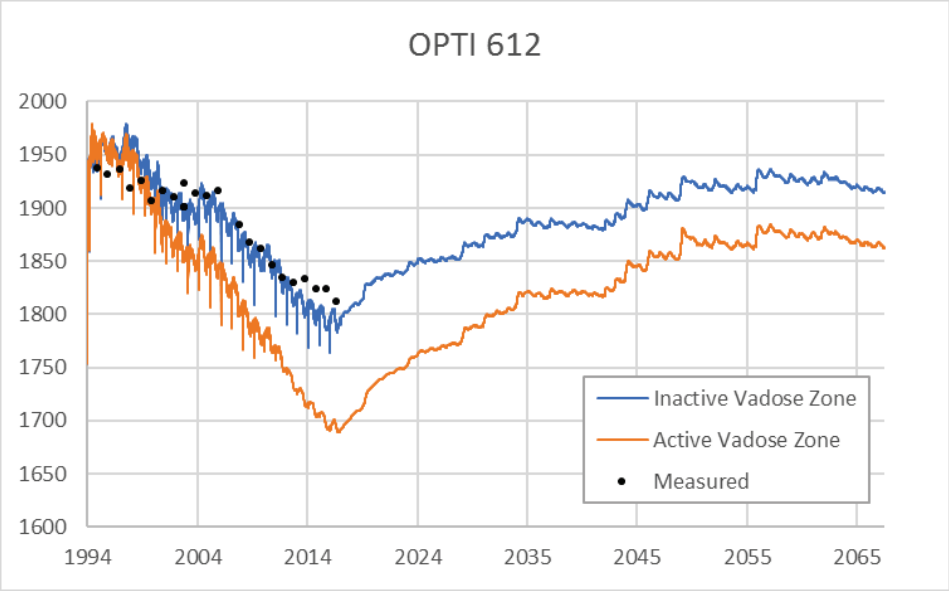


Figure 3. Hydrograph showing difference in water levels for monitoring network well OPTI 612, located near the center of the Central Basin Management Area, based on future simulations with activation (orange line) and without activation (blue line) of the modeled vadose zone.

REVIEW METHOD

The base model files used were for simulation of the projection period (2018 - 2067), with no adjustments for the effects of climate change, and no implementation of projects to increase water supply. Model files specifying native and agricultural land use areas were replaced with files provided by WC to represent pumpage reductions needed to achieve sustainability for the "no climate change and no projects" scenario. The model was configured to produce model-calculated water levels at each model node for each layer at each time step. Model-calculated water levels were extracted from model output for time steps at the beginning (30 September 2017) and end (30 September 2067) of the projection period. The average annual change in model-calculated water level over this 50-year time period was calculated for every model node and for each layer.

A surface representing the water level change for the model area was interpolated for each layer from these results using the ArcMap Spatial Analyst Kriging interpolation method with default settings. Due to the spatial density of data used as input to the interpolation process, the resulting surface likely would not vary significantly using different interpolation methods or parameters.

Byron Albano
Owner, Cuyama Orchards
31681 Hwy 33
Ventucopa, CA 93252
Director, Cuyama Basin Water District
Director, Cuyama Basin Groundwater Sustainability Agency
byronalbano@gmail.com

November 1, 2019

Derek Yurosek, Chairperson
Cuyama Basin Groundwater Sustainability Agency
c/o Project Coordinator, Taylor Blakslee
4900 California Ave, Tower B, 2nd Floor
Bakersfield, CA 93309
SENT VIA EMAIL TO: TBLAKSLEE@HGCPM.COM

SUBJECT: COMMENT LETTER TO FINAL DRAFT CUYAMA BASIN GROUNDWATER SUSTAINABILITY PLAN

Dear Chairperson Yurosek,

Thank you for the opportunity to submit written comments regarding the Final Draft of the Cuyama Basin Groundwater Sustainability Plan.

It will come as no surprise to my fellow community members in the Cuyama Valley, that I have serious reservations about the Cuyama Basin Groundwater Sustainability Plan that is proposed for passage. I think most members of the Cuyama Valley community share this sentiment, if not my same reservations.

After millions of dollars spent, the Cuyama GSP doesn't address what I consider to be the most significant question for the residents and property owners in the valley: **How will we arrest the historical over-pumping of the main sub-basin in a way that isn't excessively punitive to owners of the properties that caused the overdraft, and that is fair to the rest of the residents, farmers, ranchers, businesses, and property owners in the valley who use, and have used, water in a way that was, and is, sustainable.**

It's not going to be easy, we all know that. But it strikes me that this plan doesn't even start to address that question. To the contrary. The plan starts by spreading the costs of the plan to all water users in the valley regardless of the historical sustainability of that user's water supply, and without consideration of that user's conservation efforts, or their rights to continue to use water in a reasonable and sustainable way. I've resisted the temptation to condemn any particular farming operations for their activities in the main sub-basin, who have only operated within the bounds of their historical rights under California water law, but we are going to have to talk about and address these issues. There are quite a few sustainable farms and operations throughout the Valley in terms of water usage. In fact, most of them are, simply because physically they've had no choice but to live within their means when it came to water and land availability.

But this hasn't been the case in the main sub-basin. Some operations lived beyond their means when it came to a sustainable water supply. They chose to tap that supply for what it was worth, for as long as they were allowed. And it has been worth a lot. As the main aquifer was drafted down over the

decades, those with the deepest wells and the deepest pockets were able to buy cheaper contiguous parcels that either didn't have access to water, or whose wells were losing out in the competition for deeper water. It has been clear for decades that this ultimately wasn't a sustainable practice. But neither was it illegal, and so those "deep straws" were used to access water that, in that region of the valley, could be piped over great distances to irrigate an expanse of land regardless of the parcel's access to water. This scenario was never really possible in most of the rest of the valley due to the highly variable topography, which limits the arable land, and fragmented hydrology that creates mostly highly localized availability of water.

SGMA now forces a cessation of the long-term overdraft that has occurred in the main sub-basin. The question is worth repeating: How will we arrest the historical over-pumping of the main sub-basin in a way that isn't excessively punitive to owners of the properties that caused the overdraft, and that is fair to the rest of the residents, farmers, ranchers, businesses, and property owners in the valley who use, and have used, water in a way that was, and is, sustainable.

I'd like to see a plan that focuses on addressing those issues so that the sustainable farming operations of the Cuyama Valley could start to imagine our future once more. Instead, we are getting a plan that opens up a growing, bottomless pit of spending that threatens us all. We have been led by our consultants, and by those operations with the deepest straws and deepest pockets, to buy into the idea that we just don't have enough data to make these decisions until we spend untold additional millions that our operations can ill afford. I don't think it was the purpose of SGMA to force smaller, often undercapitalized, farming operations, like my own, to pay the price for the ungoverned externalities of large, highly capitalized operations that have been the principal drivers of the drawdown of our largest aquifer.

SGMA has given us the tools and local decision making, precisely so that we can sort out these difficult issues. I believe we do have enough data and a clear enough understanding of the issues to start working this out while we test and improve our water model over time. In the interim, we need to be exceptionally judicious with our spending to fill the data gaps that actually bear on the pumping allocations and cost allocations on which we need to reach consensus in order to implement a successful GSP. I feel very strongly along with nearly everyone in this valley, that this should not, and cannot, require spending a million-plus dollars per year while we work that out.

Respectfully Submitted,

Byron Albano,
Owner, Cuyama Orchards
Director, Cuyama Basin Water District
Director, Cuyama Basin Groundwater Sustainability Agency

Cuyama Valley Groundwater Basin Groundwater Sustainability Plan Final Draft

Public Hearing Comment

To:
Taylor Blakslee
CBGSA Project Coordinator
1901 Royal Oaks Dr. Suite 200
Sacramento, CA 95815
Sent by electronic mail to: tblakslee@hgcpm.com

From:
Brenton Kelly
Quail Springs Permaculture
Ventucopa Uplands
Vice-Chair CBGSA SAC
brenton@quailsprings.org

November, 6, 2019

Mr. Blakslee,

Thank you for this opportunity to submit comments to the Cuyama Basin Groundwater Sustainability Agency (GSA) as part of the Public Hearing in consideration of the Cuyama Basin Groundwater Sustainability Plan (Plan).

General Comments:

With many entrenched Stakeholders protecting their interests and last minute negotiations, this Plan is being pushed and pulled around a lot right now, and satisfaction is hard to gauge yet. In the hopes that this GSP is an acceptable Plan, I'll share here my greatest concerns & dissatisfactions as a local small farmer and groundwater dependent stakeholder.

In May, I submitted several specific comments (80 discreet) on the first Public Draft. Some comments were addressed or excused but many were disregarded or the text was edited / reformatted so it was hard to determine what was new. In some cases comments were accepted in the matrix but unchanged in the Final Draft, (i.e. Alphabetize the Useful Terms of every chapter. Some are, some aren't) Also, major plan development is currently ongoing with the Management Area Agreements and Extraction Fee Report reviewed at this Public Hearing for the first time making this Final Draft very much a premature work still in process.

As many of my comments in May are still unresolved I'll share here some of my top concerns.

Specific Comments:

Management Area Agreements

I have not seen this agreement yet but I have several concerns. The very first is fiscal. Why does Cuyama need two $1 Million public water agencies? Cuyama cannot afford to pay for two agencies to consult each other's consultants and arm-wrestling with public policy. This kind of jurisdictional redundancy is not called for in SGMA. Can the CBWD shrink in relation to the size of the Management Area? Manage for it's inevitable irrelevance.

Extraction Fee Report

This is a start. This will pay the first bills. But this will not do for long. This is the hottest topic in the Plan and remains problematic. My main concerns are these:

- No Incentives or penalties to encourage compliance.
- No recognition that the problem is located only in the central region.
- No tier structure or recognition of areas with historically balanced water use.
- No recognition or discouragement of wasteful & unreasonable water use.
- No ability to adapt to and limit new water users and water use.

Executive Summary

This Summary paints a fairly pretty picture of a decidedly concerning scene. Cuyama pumps 60 TAF in a Basin with only 20 TAF sustainable yield. With a problem of this magnitude, to underrepresent in this way is like putting lipstick on the backside of the pig.

The Groundwater Quality section was greatly reduced from the Public draft, with no reference now to the high concentrations of other constituents. There is no justification for only monitoring for TDS in a Basin full of Arsenic, Boron & Nitrates. The Public Draft version presented the Existing Conditions accurately and compellingly. A resource cannot be managed if it is not well monitored. Why not monitor for more constituents without having to set any Minimum Thresholds? We need the information to understand and Model the basin Hydrology.

Figure ES-4: This Depth-to-Groundwater image shows a frightening cone of depression over 600 feet deep. That target pattern should be used to help distribute the Extraction Fee more equitably. It clearly shows where the problem spot is!

There is no mention of the major Data Gaps in the Monitoring Network or the heavy lifting required to fill them, or the effect those data Gaps have on the uncertainty of the Model. Or that this Model uncertainty was then used to plot the Management Area in Fig. E-14.

Fig. E-14 is mislabeled in the text as E-15 and undervalues the extent of the projected draw down. The Red area is greater than 5’ and up to 7.7 feet, not just 4. Why doesn’t this image more closely match Fig.ES-4?

Chapter 2. Basin Settings

This is all review of old publications, including the most recent USGS Study, which suggested further work was needed to understand the permeability of the faults. None of that work has been done. The Data Gaps are profound for all Sustainability Indicators. This Plan does not seem to include the Hydro-geological staff & investigation needed to answer the many unknowns of the Basin.

Chapter 3. Undesirable Results

This Chapter has been problematic from the start. The data clearly indicates that 50 years of chronic overdraft has caused a historic Groundwater Storage loss of over 1,000,000 AF, <400' of Groundwater Elevation declines, subsidence rates of approximately 0.8 inches per year, the total loss of the Cuyama River surface water annual base flow, and the desertification of the many GDEs across the basin. How can this plan not recognize existing, chronic & persistent Undesirable Results today if not already happening on Jan 1, 2015? The Cuyama Basin has been experiencing Undesirable Results for decades. Certainly conditions should not be allowed to get worse than they were in 2015, but many Sustainability Indicators allow for conditions to continue to worsen, very much like they currently are doing. The latest reading is the historic low in the central basin.

An acceptable and realistic solution to Cuyama's Groundwater would not start with a complete denial of the actual conditions on the ground after the acknowledged historic out of balance land use. To accept the proposed slow 20 year glide path from current chronic overdraft is to never see a return to 2015 conditions much less to ever see wetlands return to the riverbeds.

Chapter 4. Monitoring Network

Groundwater Quality: It is still unacceptable to this stakeholder that the GSA will not monitor for any other major constituents than TDS. Arsenic, Boron and Nitrates are of concern to domestic wells in the basin. This is an undesirable condition that this Plan cannot disregard. This is unacceptable in the light of California's recognition of a humane right to safe drinking water.

Data Gaps: With unknown fault permeability, no stream gauges, no subsidence monitor in the cone of depression, and little understanding of existing GDEs or data to feed the Model to predict stream flow loss, how can it be said that this Monitoring Network can satisfactorily identify the occurrence of Undesirable Results?

Chapter 5. Sustainability Indicators

All Minimum Thresholds and most Measurable Objectives were calculated to allow for further dewatering to continue with vague references to how much worse it can get since 2015. In some areas the MO is 80' below 2015 levels with MT below that. How can that protect the nearby willows and cottonwoods?

If groundwater elevations are allowed to drop that would indicate continued loss of groundwater storage which is an unacceptable Undesirable Result.

Chapter 6. Data Management System

What is this system supposed to do other than check a box for SGMA? No well completion information that had been submitted was uploaded to the DMS. Why is it

separate from the Cuyama Basin Interactive Map? Who will update the DMS with this proprietary software?

Chapter 7. Projects and Management Actions

At first glance it looks like this GSP will “Improve reliability of water supplies for local disadvantaged communities. With no funding that looks more like just a letter of support for a significant need, and feels disingenuous to the disadvantaged communities left with dry wells and trucked water.

Chapter 8. Implementation Plan

This section does not present the plan to fill the chronic Data Gaps and holes in the Monitoring Network. Who, when and how will this get done? What coordination will happen with the county permitting authorities regarding new wells or new water demands?

Summary

We are not there yet, but there is light at the end of the tunnel. Here are some highlights:

- Groundwater Quality issues are not going away and must be reconsidered.
- Equity of responsibility has not been achieved.
- The water budget is so out of balance it is reasonable to expect landowner resistance to the magnitude of the necessary reductions.
- The only incentive is to be a De miminis user and pump less than 1.5AF per year per well.
- The same logic used to exempt the rangelands applies to sustainably developed parts of the basin.
- The problem area should own more of the solution

Thank you for your consideration,

Brenton Kelly

Submitted by: The Cuyama Valley Community Association
Public Comment: To the Cuyama Basin Groundwater Sustainability Agency regarding the Draft Groundwater Sustainability Plan
Date: November 6, 2019

The Cuyama Valley Community Association represents 140 members who live, work or own property in the Cuyama Valley.

As an organization that is deeply grounded in the community, the CVCA has closely monitored the development of the Groundwater Sustainability Agency, the establishment of the Standing Advisory Committee and the creation of the Groundwater Sustainability Plan that is currently under review. The CVCA has held numerous Town Hall meetings about SGMA implementation and its potential impact on the valley, and the CVCA receives monthly updates on the progress of SGMA implementation in the Cuyama Basin.

The CVCA anticipates that SGMA implementation will have a profound impact on the Cuyama Valley through 2040. It is important to note that the legislation's emphasis on "local control" is reflected not only in the creation of the GSP, but also in its implementation. Throughout the development of the GSP, the Standing Advisory Committee has helped to educate the community and amplify the voices and concerns of local residents in this process. As the GSA and the community transitions from the *creation* of the all-important Groundwater Sustainability Plan to the *implementation* of the plan, a strong and well-supported Standing Advisory Committee will help to ensure that the local community is well represented and is an active participant in grappling with the issues that will surely result from SGMA implementation. On behalf of all members of the CVCA, the CVCA Board strongly urges the Groundwater Sustainability Agency to maintain a parallel schedule of separate meetings for the Standing Advisory Committee to the Groundwater Sustainability Agency, and to specific those activities in the final draft of the Groundwater Sustainability Plan for the Cuyama Basin.

Respectfully submitted,

Brenton Kelly, CVCA Board Chair
Meg Brown, CVCA Board Vice-Chair
Pam Baczuk, CVCA Board Secretary
Nicole Furstenfeld, CVCA Board Member
Alex Guerrero, CVCA Board Member
Em Johnson, CVCA Board Member
Alison Mann, CVCA Board Member

Taylor Blakslee

From: Timothy Naughton <naughton.t.d@gmail.com>
Sent: Friday, November 1, 2019 11:36 PM
To: Taylor Blakslee
Subject: COMMENT FOR NOV 6 HEARING

As a landowner in Cuyama Basin that has NEVER used and NEVER plans on using the ground water, I am concerned about sharing the cost of establishing and enforcing a GSP. I feel adamantly that this cost should be shared among those using the ground water. Land owners not using the ground water remain a resource to contribute to the recharge rate but should NOT be accountable for the cost of future water sustainability rates.

Sincerely.
Timothy D Naughton
Western Cuyama Valley, School House Canyon

TO: Board of Directors
Agenda Item No. 15

FROM: Jim Beck, Executive Director

DATE: November 6, 2019

SUBJECT: Set a Groundwater Extraction Fee for 2020

Issue

Consider setting a groundwater extraction fee for 2020 to fund the CBGSA.

Recommended Motion

Set a groundwater extraction fee of $19 per acre-foot of water pumped in 2019 and authorize staff to invoice landowners according to the policies in the groundwater extraction report.

Discussion

At the July 10, 2019 Cuyama Basin Groundwater Sustainability Agency (CBGSA) Board of Directors meeting, the Board made a motion to establish a groundwater extraction fee for 2020 to fund the administration of the CBGSA. Chair Yurosek appointed an ad hoc to work with staff to develop a draft groundwater extraction report which was completed and distributed on October 17, 2019. Directors Bantilan, Cappello, Chounet, Shephard and Wooster held meetings with staff to develop the groundwater extraction report that is provided as Attachment 1. The recommended fee of $19 per acre-foot is based on estimated pumping in Cuyama of 60,000 acre-feet and the costs from the Fiscal Year 2019-2020 budget.

DRAFT

2019 GROUNDWATER EXTRACTION FEE REPORT

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

TABLE OF CONTENTS

Section 1 – ACRONYMS

af	Acre-feet
CBGSA	Cuyama Basin Groundwater Sustainability Agency
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
SGMA	Sustainable Groundwater Management Act

Section 2 – DEFINITIONS

De Minimis User – *Commercial*

Uses 1.5 acre-feet or less in a year per well. De minimis users do not have to pay a fee, but must still provide well information on Form E as found in Exhibit B.

De Minimis User – *Domestic (Non-Commercial)*

Uses 2 acre-feet or less in a year per well. De minimis users do not have to pay a fee, but must still provide well information on Form E as found in Exhibit B.

Section 3 – CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY BACKGROUND

The Cuyama Basin Groundwater Sustainability Agency (CBGSA) was formed in 2017 under the Sustainable Groundwater Management Act (SGMA) to develop and implement a Groundwater Sustainability Plan (GSP), The purpose of the GSP is to achieve groundwater sustainability for the Cuyama Basin by 2040. The CBGSA is governed by an 11-member board with representatives from the four counties that intersect the Basin (Kern, Santa Barbara, San Luis Obispo, and Ventura), the Cuyama Community Services District, and the Cuyama Basin Water District.

The CBGSA intends to establish a groundwater extraction fee to fund the successful implementation of the GSP.

Section 4 – ESTABLISHING A FEE

Water Code section 10730.2 authorizes Groundwater Sustainability Agencies (GSAs) to establish a groundwater extraction fee to fund implementation of a GSP. The CBGSA has set the fee over the calendar year for 2020 and is based on pumping in 2019.

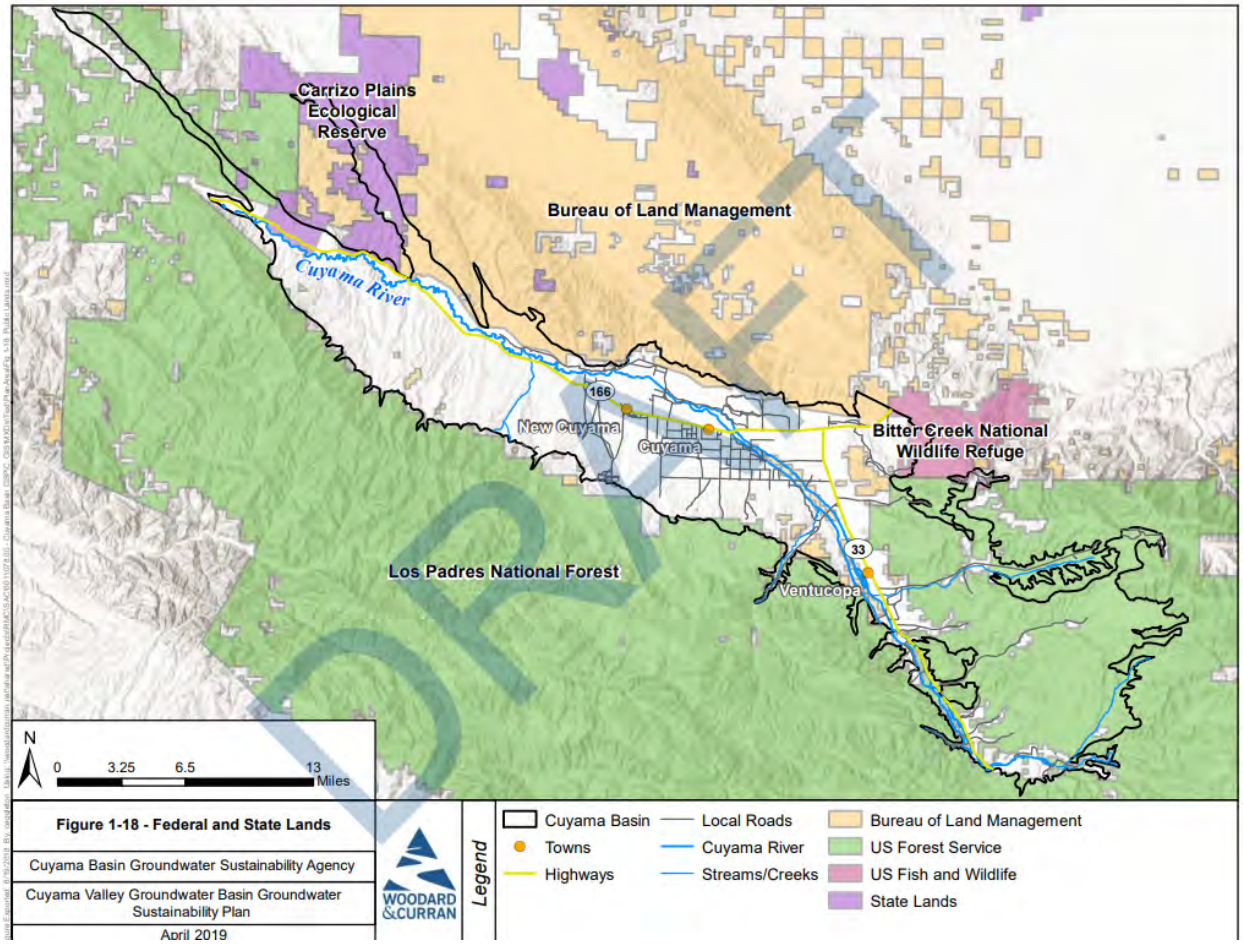
Section 4.1 – Definition of an "Extractor"

An extractor is defined as a pumper of groundwater within the Cuyama Basin groundwater basin boundary as defined by California Department of Water Resources' Bulletin 118 (see Figure 1 below). The below groups are not considered extractors:

Exclusions:

- De miminis user – wells that use 1.5 acre-feet or less per year for commercial purposes, or wells that use less than 2 acre-feet per year for residential purposes. De minimis users do not have to pay a fee, but must still provide well information on Form E as found in Exhibit B.
- State and federal lands – non-commercial water use on State and federal lands. Well use on State and federal lands do not have to pay a fee, but must still provide well information on Form E as found in Exhibit B.

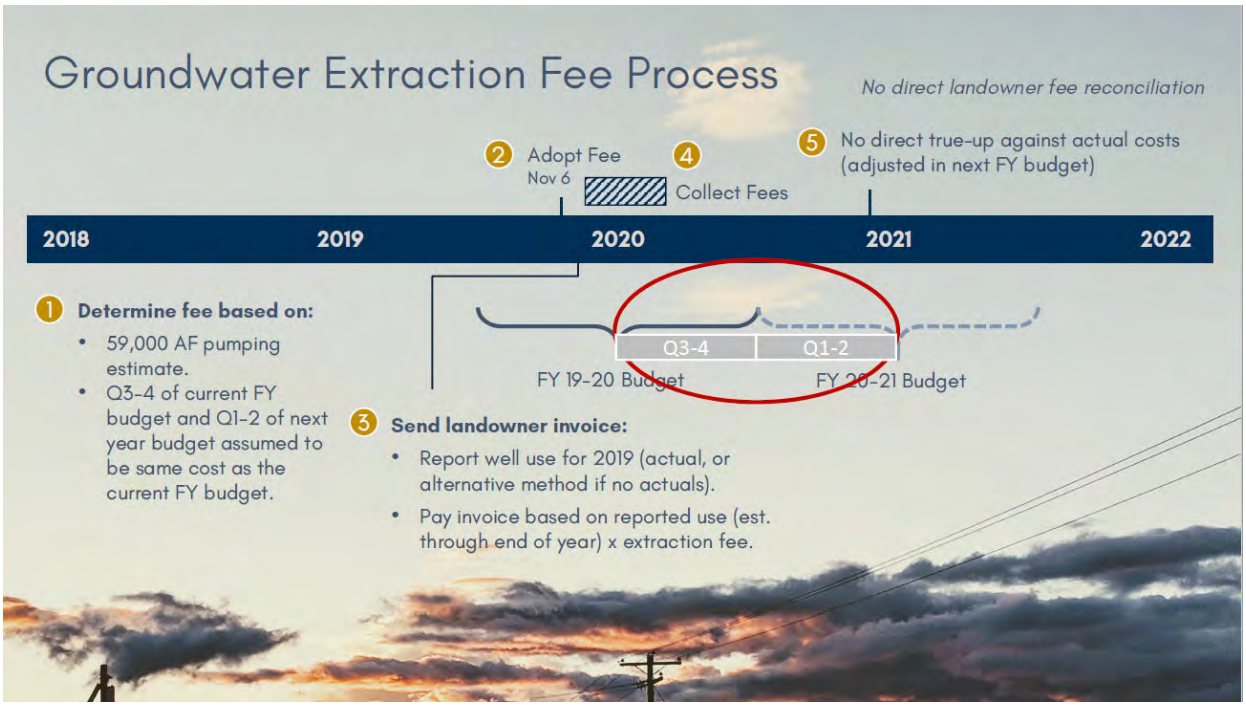
FIGURE 1 – GROUNDWATER BASIN IN CUYAMA



Section 4.2 – Fee Basis

The proposed groundwater extraction fee is based on the CBGSA's fiscal year budget and includes an estimated delinquency rate of 10 percent. Since the fee is based on a calendar year and the fiscal year budget is for the period June-July, the July through December period is assumed to be similar to the previous calendar year from the current fiscal year budget (see Figure 2 below). The fiscal year budget for 2019-2020 was adopted on August 7, 2019 and totaled $1,021,936 and is attached as Exhibit A. Extractions for 2019 are estimated to be 60,000 acre-feet which is based on the current conditions from the CBGSA GSP Water Budget Chapter, Section 2.3.5 Water Budget Estimates, Table 2.3-3. Based on the fiscal year 2019-20 budget amount and estimated pumping, we recommend a groundwater extraction fee of $19 per acre-feet.

FIGURE 2 – GROUNDWATER EXTRACTION FEE PROCESS AND BASIS



Section 5 – ADMINISTRATION OF FEE

Section 5.1 – Extraction Statements

Extraction statements and corresponding instructions for payment of the extraction fee will be sent to all parcel owners in November of each year. If payments are not received by the due date of January 31, a past due notice will be mailed out in February.

Section 5.1.1 – Metered

For metered use, Form A (included in Exhibit B of this report) calculates the amount owed to the CBGSA. If well is metered, landowner ****must**** use the metered form (may not use non-metered forms).

Metered Use Form:
A – Metered Use

Section 5.1.2 – Non-metered

For well owners without meters, estimated water use will be determined using one of the below form(s). These forms are included in Exhibit B of this report and instructions on filling out the forms are provided on the forms.

Non-Metered Use Forms:
B – Pump Efficiency Test
C – Agricultural Use
D – Municipal & Industrial Use

Section 5.1.3 – De Minimis

De minimis users (see Section 2 for definitions) do not have to pay a fee, but must still provide well information on Form E as found in Exhibit B.

De Minimis Use Form:
E – De Minimis User

Section 5.2 – Water Use Audit

The CBGSA may elect to perform random water audits to verify reported pumping.

Section 5.3 – Schedule/Reporting period

The below schedule outlines the groundwater extraction fee process:

Nov	Extraction statements sent to all parcel owners
Nov-Jan	Payment collected for water use in the calendar year
Feb->	Late penalties assessed
Mar-Jun	Fiscal year budget development (budget will be adjusted depending on fee payments received)
Nov	Rate hearing

Section 6 - PENALTIES

Well owners will be charged a 10 percent penalty after the January 31, 2020 due date with an escalation rate of 1 percent for each month late after the initial due date.

Exhibit A

FISCAL YEAR 2019-20 BUDGET

CBGSA FY 2019-20 BUDGET

	Budget		
	July-Jan	Feb-Jun	Total
HALLMARK GROUP			
HG - CBGSA Board of Directors Meetings	$ 66,014	$ 13,300	$ 79,314
HG - Consultant Management and GSP Development	$ 16,901	$ 28,900	$ 45,801
HG - Financial Information Coordination	$ 19,240	$ 13,550	$ 32,790
HG - Cuyama Basin GSA Outreach	$ 11,588	$ 7,150	$ 18,738
HG - Management Area Admin		$ 15,000	$ 15,000
HG - Travel (Mileage)	$ 848	$ 270	$ 1,118
FY 19-20 Total	$ 114,590	$ 78,170	**$ 192,760**
Monthly Total	$ 16,370	$ 15,634	$ 16,063
LEGAL & ADMIN			
Legal Counsel	$ 35,000	$ 25,000	$ 60,000
Grant Proposals	$ 40,000		$ 40,000
Prop 218 - Basin-wide	$ 60,000		$ 60,000
Audit	$ 16,000		$ 16,000
Insurance		$ 11,000	$ 11,000
California Association of Mutual Water Co. Membership	$ 200		$ 200
Travel/ Conferences/ Training			$ -
Other / Miscellaneous			$ -
Contingency	$ 20,000		$ 20,000
FY 19-20 Total	$ 171,200	$ 36,000	**$ 207,200**
Monthly Total			$ 17,267
WOODARD & CURRAN & TECHNICAL			
BASIN-WIDE COSTS			
Economic Analysis of Projects and Actions		$ -	$ -
Stakeholder/Board Engagement			
SAC meetings (6/year)	$ 24,411	$ 24,411	$ 48,822
Board meetings (6/year)	$ 25,221	$ 25,221	$ 50,442
Board Ad-hoc calls (6/year)	$ 4,923	$ 4,923	$ 9,846
Public Workshops (2/year)	$ 14,712		$ 14,712
Outreach			
General, Newsletter development, etc.	$ 9,904	$ 9,904	$ 19,808
Meeting and Outreach Subtotal	$ 79,171	$ 64,459	$ 143,630
Website Updates - Maintenance / Hosting	$ 2,997	$ 2,997	$ 5,994
Finalization of GSP (year 1 only)			
Category 1 (funded) - *field work*	$ 180,000		$ 180,000
Category 2 (funded) - *grant admin / document revisions*	$ 14,990		$ 14,990
Category 2 (unfunded) - *additional GSP development costs*	$ 30,030		$ 30,030
GSP Implementation program management		$ 20,480	$ 20,480
Manage satellite Imagery to track water usage		$ 20,252	$ 20,252

	July-Jan	Feb-Jun	Total
GW level/quality monitoring network			
Levels		$ 30,376	$ 30,376
Quality (TDS only)		$ 30,376	$ 30,376
DWR TSS Support	$ 18,848	$ 18,848	$ 37,696
Data management		$ 18,032	$ 18,032
Complete Annual Reports		$ 40,512	$ 40,512
GSP 5-year Evaluation/Update			$ -
MANAGEMENT AREA COSTS			$ -
Development of MA Policies and Guidelines		$ 49,608	$ 49,608
Prop 218 - MA			$ -
Pumping allocation tracking and management			$ -
Initiate program			$ -
Annual management			$ -
Project implementation			$ -
Water Supply Projects			$ -
Project Feasibility Studies			$ -
Design, permitting and construction			$ -
Annual O&M - Cloud Seeding			$ -
Annual O&M - Storm Water Capture			$ -
FY 19-20 Total	$ 326,036	$ 295,940	**$ 621,976**
Monthly Total	$ 46,577	$ 59,188	$ 51,831
TOTAL	$ 611,826	$ 410,110	**$ 1,021,936**

Exhibit B

EXTRACTION STATEMENTS (WATER USE FORMS)

Form A
METERED USE

WATER USE WORKSHEET – 2019
Cuyama Basin Groundwater Sustainability Agency

Name _____

Address _____

Phone Number _____

Instructions:

1. Input well ID and location in columns A and B
2. Input metered water use in column C for 2019*.
3. Multiply values in column C by the groundwater extraction fee in column D and input result in column E.
4. Total the amounts in column E.
5. Pay the amount from column E to the Cuyama Basin Groundwater Sustainability Agency at the following address:

   CBGSA
   1901 Royal Oaks Drive, Suite 200
   Sacramento, CA 95815

**If the year 2019 is not complete at the time of filling out this form, please estimate water use for the remaining months by prorating water use from the actual months in 2019.*

Payment Calculation

A	B	C		D		E
Well ID	Well Location (APN or Address)	Metered Water Use in 2019 (acre-feet)		Groundwater Extraction Fee ($/af)		Amount due to the CBGSA
			X	$19	=	$
			X	$19	=	$
			X	$19	=	$
			X	$19	=	$
			X	$19	=	$
			X	$19	=	$
			X	$19	=	$
				Total:		$

Form B
PUMP EFFICIENCY TEST

WATER USE ESTIMATE WORKSHEET – 2019
Cuyama Basin Groundwater Sustainability Agency

Please use one form per well

Name _____

Address _____

Phone Number _____

Well ID _____

Well Location (APN or address) _____

Instructions:

1. Select one the below methods (efficiency test, power meter, total elapsed time) to estimate pumping (detailed instructions for each method are provided in Exhibit A).
2. Input total estimated acre-fee used in the below table entitled "Total Water Use and Amount Owed" and multiply by the groundwater extraction fee to determine the amount owed to the Cuyama Basin Groundwater Sustainability Agency (CBGSA).
3. Make payment to the following address:

   CBGSA
   1901 Royal Oaks Drive, Suite 200
   Sacramento, CA 95815

1. Power Meter Serial Number:_____

	Column A	Column B_____ (Enter Multiplier Here)
2. Power Meter Reading – End of Reporting Period	_____	
3. Power Meter Reading – Beginning of Reporting Period	_____	
4. Subtract Line 3 from Line 2	_____ X	_____ = _____KWH

Efficiency Test Method

If you have an efficiency test report on your water producing facility, you may determine your water production below by using the efficiency test report and filling in the following information:

	KWH
5. From your efficiency test report enter kilowatt hours per acre-foot of water pumped	_____AF
6. Divide Line 4 by Line 5	_____AF

Power Meter Method

If your water producing facility is equipped with a separate power meter and you have a record of the beginning and ending meter readings, you may determine your water production below by filling in the following information:

7. Enter the total "Head in Feet." (See definition on reverse) _____
8. Divide Line 4 (Total Kilowatt Hours Used) by Line 7 _____
9. Multiply the result of Line 8 by 0.391 and enter acre-feet of water pumped _____AF

Total Elapsed Time Method

If you have an elapsed time meter recording the time the pump operated and a flow rating giving the gallons per minute produced, you may determine your production below.

10. Meter's unit of measurement:_____ Flow test made by:_____
11. Meter reading – end of reporting period: _____
12. Meter reading – beginning of reporting period: _____
13. Subtract Line 12 from Line 11: _____
14. If meter registers in hours – convert to minutes TOTAL _____MIN
15. Pumping Rate (gallons per minute) method _____ GPM
16. Multiply Line 13 (or Line 14 if meter registers in hours) by Line 15 _____ GALS
17. Divide the number of gallons shown in Line 16 by 325,850 _____ AF

Total Water Use and Amount Owed

Total Water Use (acre-feet from rows 6, 9, or 17)		Groundwater Extraction Fee		Amount Owed
	X	$19	=	$

Exhibit A

INSTRUCTIONS

Efficiency Test Method
The Efficiency Test Method may be used if you have had an efficiency test completed on your well and the same well has a separate power meter. If a double-throw switch, drier or other electrical unit(s) is using the same power meter as your water producing facility, the efficiency test method CANNOT be used. If the only other use is a booster pump motor, it can be included in the pump test. You must have a record of the power meter reading at the beginning and ending of the reporting period. The efficiency test provides a procedure whereby the kilowatt hours (KWH) per acre-feet for water pumped can be used to measure the time element of the formula. Complete Lines 1, 2, 3, 4, 5 and 6.

Power Meter Method
This method may be used by persons who have a separate electrical power meter and who have submitted or attached to the Water Production Statement the beginning and ending electrical power readings for the reporting period. If you have a double-throw switch, drier or other electrical equipment using the same electric power meter as your water producing facility, Worksheet "A" MUST NOT be used. If the only other power used is a booster pump motor for irrigation and domestic use, this usage may be calculated and excluded. In addition to the above, the pumping depth to water must be known. If you do not know the pumping depth to water, call the Agency office for determination of the depth in your area during the period of use.

Subtract Line 3 from Line 2 and enter the result in Column A, Line 4. If there is a multiplier, enter the multiplier number on Line 4 in the space provided in Column B. Multiply the amount show in Column A by the multiplier and enter the result in Column B. If there is NO multiplier, enter the amount shown in Column A in Column B.

Enter the total "Head in Feet" on Line 7. The height in feet from the pumping level to the highest outlet point plus pressure head* = "Head in Feet." Unless your well is equipped with a depth recorder, contact the Agency for depth to water for your immediate area during periods of irrigation. The Agency makes regular well measurements and maintains record files of this data. Complete Lines 8 and 9.

Total Elapsed Time Method
This method may be used by persons having an elapsed time meter on their water producing facility to record the amount of time the pump was in operation. The rate of gallons pumped must be known, either from an efficiency test report or an approved method of determining the rate or your water production; for example, actual measurement of the water flow in gallons per minute. Complete Lines 10, 11, 12, 13, 14, 15, 16 and 17.

*To change pressure head in psi into head in feet, multiply psi X 2.31

EXAMPLE: 40psi x 2.31 = 92.4 feet

Form C
AGRICULTURE

WATER USE ESTIMATE WORKSHEET – 2019
Cuyama Basin Groundwater Sustainability Agency

Please use one form per well

Name _____

Address _____

Phone Number _____

Well ID _____

Well Location (APN or address) _____

Instructions:

1. For 2019, input crop name(s) in column A, the associated acres in column B, and the corresponding crop factors from the attached Exhibit A in column C.
2. Multiply acres (column B) by the crop factor (column C) and input result in column D.
3. Total the acre-feet from column D in row 2 and multiply by the groundwater extraction fee in row 3 and enter in row 4 to determine the amount owed to the Cuyama Basin Groundwater Sustainability Agency (CBGSA).
4. Make payment to the following address:

CBGSA
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815

	A	B		C		D
	Crop Name	Acres		Crop Factor		Water Use (acre-feet)
1			X		=	
			X		=	
			X		=	
			X		=	
			X		=	
			X		=	
			X		=	
			X		=	
2	Total Acre-feet (sum column D)					
3	Groundwater Extraction Fee ($/af)					$19
4	Total Cost					$

Exhibit A – Crop Factors

Source Information

Crop Factors are evapotranspiration (ET) values from California Polytechnic State University's Irrigation Training and Research Center (ITRC) California Crop and Soil Evapotranspiration Report (Crop Report), ITRC Report No. R 03-001 accessible at www.itrc.org/reports/pdf/californiacrop.pdf.

The below values were calculated using ET reference averages for zone 10 from the Crop Report (see below figure).

Monthly Avg Reference ET by Zone (inches/mo)

Zone	Total
1	33.0"
2	39.0"
3	46.3"
4	45.5"
5	43.9"
6	49.7"
7	43.4"
8	49.4"
9	55.1"
10	**49.1"**
11	53.0"
12	53.3"
13	54.3"
14	57.0"
15	57.0"
16	62.5"
17	66.5"
18	71.3"

Crop Factors

Crop	ET	Crop	ET
Alfalfa Hay	4.02	Grapes	1.5-2.1 (zone 3)
Alfalfa Seed	3.60	Lettuce	2.20
Almonds	3.32	Permanent Pasture	3.93
Apples, Pear, Cherry, Plum and Prune	3.33	Pistachios	2.99
Barley Wheat	1.97	Potatoes	3.00
Blackeyed Peas	1.97	Sorghum Grain	2.43
Carrots	2.20	Sugar Beets	2.70
Corn	2.43	Tomatoes	2.20
Cotton	2.70	Walnuts	3.53
Citrus	3.45		
Deciduous Fruit	3.33-4.58	Apples (drip)[1]	2.50
		Cannabis[2]	TBD
		Hemp[3]	TBD

[1]Value determined by local expertise in the Cuyama Valley.
[2]Value based on ____.
[3]Value based on ____.

Form D
MUNICIPAL & INDUSTRIAL
WATER USE ESTIMATE WORKSHEET – 2019
Cuyama Basin Groundwater Sustainability Agency

Please use one form per well

Name _____

Address _____

Phone Number _____

Well ID _____

Well Location (APN or address) _____

Instructions:

1. For 2019, input units used for municipal & industrial water use in column B (see Exhibit A to calculate units).
2. Multiply units used (column B) by the water consumption factor in column C and input result in column D.
3. Total the gallons from column D and convert to acre-feet on row 13.
4. Multiply acre-feet used from row 13 by the groundwater extraction fee on row 14 to determine the amount owed to the Cuyama Basin Groundwater Sustainability Agency (CBGSA).
5. Make payment from row 15 to the following address:

CBGSA
1901 Royal Oaks Drive, Suite 200
Sacramento, CA 95815

	A	B		C		D
	Type of Use	Units Used		Water Consumption Factor (Gal)		Water Use (Gal)
1	Chicken Ranches		X	3,532	=	
2	Livestock Drinking Water No. of cows, bulls and horses No. of stockers No. of sheep and goats		X	5,520 2,760 1,100	=	
3	Hotels No. of Rooms		X	46,000	=	
4	Office Buildings; including Churches No. of Offices		X	38,600	=	
5	Restaurants Seating capacity		X	11,400	=	
6	Service Stations No. of stations		X	350,000	=	
7	Stores Sq ft of building		X	50	=	

8	Trailer Court Avg no. of people		X	36,800	=	
9	Elementary Schools No. of students x No. of school days		X	80	=	
10	Junior & Senior High Schools, Colleges and Churches No. of students x No. of school days		X	160	=	
11	Watered Land; non-ag No. of acres		X	5	=	
12	Total Gallons (sum column D)					
13	Convert to Acre-feet (Row 12 / 325,850)					
14	Groundwater Extraction Fee					$19
15	Total Cost					$

Exhibit A – Unit(s) Calculations

Unit Calculation

	Type of Use	Units Used
1	Chicken Ranches	Avg number of units of 100 chickens on hand for the reporting period.
2	Livestock Drinking Water	Average number of livestock on hand for the reporting period (drinking water only). Amounts derived from NDSU Extension Service report from July 2015 en. tled "Livestock Water Requirements."
3	Hotels	Total number of rooms.
4	Office Buildings; including Churches	Total number of offices in building, or offices served.
5	Restaurants	Total number of seats including seats at the counter, chairs, stools, benches and patio seating.
6	Service Stations	Number of stations served.
7	Stores	Square feet of any store, supermarket or shop. Calculation includes employee, customer and maintenance water use.
8	Trailer Court	Average number of people in the trailer court.
9	Elementary Schools	Total number of students, faculty, custodians, and maintenance staff multiplied by the number of school days. If there was non-ag watered land input amount in row 11.
10	Junior & Senior High Schools and Churches	Total number of students, faculty, custodians, and maintenance staff multiplied by the number of school days. If there was non-ag watered land input amount in row 11. For churches, figure total hours and divide by 8 to determine number of "school days."
11	Watered Land; non-ag	All lands, ornamental plants, shrubs, etc., watered but not qualifying for agricultural rate.

Form E
DE MINIMIS USER

WATER USE WORKSHEET – 2019

Cuyama Basin Groundwater Sustainability Agency

Name _____

Address _____

Phone Number _____

Reporting:
While de minimis users do not have to pay the groundwater extraction fee, they must file their water use, type and well information in the below table.

De Minimis User Definitions:

- ***Commercial*** – Uses 1.5 acre-feet or less in a year per well.
- ***Domestic (Non-Commercial)*** – Uses 2 acre-feet or less in a year per well.

A	B	C	D	E
Well ID	Well Location (APN or Address)	Use Type (Commercial or Domestic; Non-Commercial)	Type of Commercial Use **If applicable*	Estimated Water Use (acre-feet)