



# CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

## BOARD OF DIRECTORS MEETING

### Board of Directors

**Cory Bantilan** Chair, Santa Barbara County Water Agency  
**Derek Yurosek** Vice Chair, Cuyama Basin Water District  
**Arne Anselm** Secretary, County of Ventura  
**Byron Albano** Treasurer, Cuyama Basin Water District  
**Rick Burnes** Cuyama Basin Water District  
**Steve Jackson** Cuyama Basin Water District

**Jimmy Paulding** County of San Luis Obispo  
**Katelyn Zenger** County of Kern  
**Matthew Young** Santa Barbara County Water Agency  
**Deborah Williams** Cuyama Community Services District  
**Jane Wooster** Cuyama Basin Water District

### AGENDA

March 5, 2025

Agenda for a meeting of the Cuyama Basin Groundwater Sustainability Agency Board of Directors to be held on Wednesday, March 5, 2025, at 2:00 PM at the **Cuyama Valley Family Resource Center 4689 CA-166, New Cuyama, CA 93254**. Participate via computer at: <https://msteams.link/4GXC> or by going to Microsoft Teams, downloading the free application, then entering Meeting ID: 211 568 992 705 Passcode: et2fD66g or enter or telephonically at (469) 480-3918 Phone Conference ID: 839 596 065#.

#### Teleconference Locations:

4689 CA-166  
New Cuyama, CA 93254

1115 Truxtun Ave, 5<sup>th</sup> Floor,  
Bakersfield, CA 93301

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. 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 (Bantilan) (1 min)
2. Roll Call (Blakslee) (1 min)
3. Pledge of Allegiance (Bantilan) (1 min)
4. Meeting Protocols (Blakslee) (2 min)
5. Standing Advisory Committee Meeting Report (Kelly) (3 min)

### CONSENT AGENDA

*Items listed on the Consent Agenda are considered routine and non-controversial by staff and will be approved by one motion if no member of the Board or public wishes to comment or ask questions. If comment or discussion is desired by anyone, the item will be removed from the Consent Agenda and will be considered in the listed sequence with an opportunity for any member of the public to address the Board concerning the item before action is taken.*

6. Approve January 15, 2025, Meeting Minutes (Bantilan) (1 min)
7. Approve January 27, 2025, Special Meeting Minutes (Bantilan) (1 min)
8. Approve Payment of Bills for December 2024 January 2025 (Blakslee) (1 min)

9. Approve Financial Reports for December 2024 January 2025 (Blakslee) (1 min)

### **ACTION ITEMS**

*All action items require a simple majority vote by default (50% of the vote). Items that require a super majority vote (75% of the weighted total) will be noted as such at the end of the item.*

10. Update on Cloud Seeding Study (Desert Research Institute) (15 min)
11. Groundwater Sustainability Plan Implementation
- a) Discuss and Take Appropriate Action on Water Year 2023-2024 Annual Report (Van Lienden) (10 min)
  - b) Discuss and Take Appropriate Action on 2024 Central Management Area Allocation Use (Blakslee/Hughes) (45 min)
  - c) Discuss and Take Appropriate Action on GSA Project Prioritization/Schedule (Beck) (60 min)
  - d) Discuss and Take Appropriate Action on Fiscal Year 2025-2026 Budget Components (Blakslee) (30 min)
  - e) Consider Fee Equity (Blakslee) (5 min) – *Verbal*
  - f) Discuss and Take Appropriate Action on Landowner CIMIS Station Installation Proposal (Blakslee) (10 min)
12. GSA Administration
- a) Discuss and Take Appropriate Action on GSA Insurance Renewal (Blakslee) (5 min) – *Verbal*
  - b) Discuss and Take Appropriate Action on Financial Controls Policy (Blakslee) (5 min)

### **REPORT ITEMS**

13. Update on Farm Unit Modification Application Process (Blakslee) (5 min) – *Verbal*
14. Update on Potential Non-Reporting Pumpers (Blakslee) (10 min)
15. Administrative Updates
- a) Report of the Executive Director (Blakslee) (5 min)
  - b) Report of the General Counsel (Hughes) (5 min)
16. Technical Updates
- a) Update on Groundwater Sustainability Plan Activities (Van Lienden) (5 min)
  - b) Update on Grant-Funded Projects (Van Lienden) (5 min)
  - c) Update on January 2025 Groundwater Conditions Report (Van Lienden) (5 min)
17. Report of Ad Hoc Committees (1 min)
18. Directors' Forum (1 min)
19. Public Comment for Items Not on the Agenda (5 min)
20. Correspondence (1 min)

### **CLOSED SESSION**

21. Conference with Legal Counsel – Existing Litigation (15 min)  
Pursuant to Government Code section 54956.9(d)(1)
- (a) Bolthouse Land Company, LLC, et al v. All Persons Claiming a Right to Extract or Store Groundwater in the Cuyama Valley Groundwater Basin (BCV-21-101927)
22. Adjourn (6:15 p.m.)

CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

**2025 Board Ad hocs**

<b>1</b>	<b>CIMIS Station Implementation Policy</b>	Burnes Bantilan Wooster
<b>2</b>	<b>Variance</b>	Albano Anselm Jackson Young
<b>3</b>	<b>Farm Unit Policy</b>	Albano Bantilan Yurosek
<b>4</b>	<b>Fiscal Year Budget</b>	Burnes Young Zenger

**Tech Forum Participants**

<b>Participants</b>	<b>Entity</b>	<b>Representing</b>
Aman Singh Anthony Daus	GSI	Bolthouse / Grimmway
Mack Carlson	BHFS	Coalition of Landowners for Commonsense Groundwater Solution
Derrick Williams	Montgomery & Associates	Coalition of Landowners for Commonsense Groundwater Solution
Bob Abrams Sean Hartman	Aquilogic	BBK
Matt Klinchuch	Cuyama Basin Water District	Cuyama Basin Water District
Jeff Shaw John Fio Macy Frost Marco Maneta	EKI	Cuyama Basin Water District
Neil Currie	Cleath-Harris	Grapevine Capital
Matt Young Matt Scudato	Santa Barbara County Water Agency	Santa Barbara County
Bianca Cabera Steve Johnson Jeff Helsley	Stetson Engineers	Sunrise Olive

## **Standing Advisory Committee Report**

**Meeting Date: February 27<sup>th</sup>, 2025**

Submitted to the CBGSA Board of Directors on January 15th, 2025

By Brenton Kelly, SAC Chair

The Standing Advisory Committee met at the Family Resource Center in a hybrid format, with all members present, four in-person and three on the conference line with one member abstaining due to the Brown Act timing of posting notice of a remote location. GSA Staff Taylor Blakeslee was joined by Grace Bianchi in the room, with Brian Van Lienden and Alex Dominguez on the call. One stakeholder was in the room and several others were on the video conference. The meeting lasted 3 hours.

A Public Comment was made by Dave Lewis on behalf of his family in gratitude and appreciation for everyone in the community and on the GSA who showed support for the Lewis Farm Variance consideration.

The Cloud Seeding presentation from Frank McDonough of DRI was delayed to later in the meeting when he could be available.

Shortly before the end of the meeting SAC members had several questions for GSA legal counsel, Mr. Dominguez. Community concerns were raised about the GSAs withdrawal of their Expert Witness to present and defend the GSP when considering the Sustainable Yield in the Adjudication lawsuit. Respectfully, Mr Dominguez was not able to provide any direct comments about closed door deliberations, but he tried to assure that the interests of the GSA were to protect the GSP.

Committee Member Jaffe expressed concern that there have not been any current updates to the adjudication resource page on the CBGSA website. Robbie says people in the valley need to know these resources, they need to have access to updated information. Mr. Dominguez responded that a bill was passed in 2024 that required GSAs to provide specific information to the public. He added that Cuyama Basin was already in Adjudication when the law passed and was thereby excused from needing to comply with the posting requirements. Jaffe asked if the GSP has been presented to the Judge for consideration of the Sustainable Yield? Mr. Dominguez at first said he did not know, but thought that it had and he will have to check to be sure.

During the meeting the Committee made only formal motions to approve the minutes and the Annual Report. In addition to in-depth discussions, many considerations were made as recommendations for the GSA and I will endeavor to present a helpful synopsis of the array of stakeholder feedback.

### **10.) Update on Cloud Seeding Study by Desert Research Institute**

Committee member Haslett asked about verification. Frank McDonough explained the method of trying to measure the rainfall at the target spot and an unseeded control spot. He acknowledged that verification is a challenge, but the numbers suggest an effect of 5-15% increased precipitation is possible.



Committee member Lewis observed that the most favorable years for cloud seeding were during wet years, which are not when additional rain would be needed or frequent in Cuyama. He did not think it would be financially responsible to support this project.

Stakeholder John Caufield requested staff reevaluate the estimated cost per acre feet for the ground program that reflects the generator life span and noted that the estimated cost is in 2025 dollars.

The biggest concern seemed to be the worry that the extra rain would simply run off and go to Twitchell since there is no capture and storage system in the Valley. Brian Van Lienden did mention that some of it may go back into the groundwater, but again, without deep percolation studies and age dating of the water in the deep aquifers that are being pumped, there is no evidence that the water is actually recharging the productive aquifer.

The SAC remains in general agreement with a consensus to recommend that the GSA board **does not pursue** this project at this time. Keeping it on the list, if even at the bottom, will keep all future options open and is aligned with our updated GSP project list.

### **12, a) Discuss and Take Appropriate Action on Water Year 2023-2024 Annual Report**

Chair Kelly asked for some explanation of the water elevation contour maps. Where is the Cuyama River on the map and why does it look like all the groundwater is moving north out of the Basin instead of downstream or into the central cone of depression? Mr. Van Lienden explained the limitations of how the contours are extrapolated and that there are monitoring wells north of the Cuyama River and that it would be helpful to show the Cuyama River on this map.

Committee Member Jaffe asked about the five wells that exceeded their Minimum Thresholds. She notes that there is no explanation for why they are dropping or what will be done about it. There is no explanation of why there are such fewer exceedances this year than last year when 21 wells exceeded their thresholds! One might assume from this Report that conditions have recently improved dramatically, but Mr. Van Lienden responded that the well levels have not changed significantly and the shift in monitoring well status was due to the resetting of minimum thresholds approved by the board in the new GSP.

The **motion to approve the Annual Report** passed unanimously with one abstention.

### **12,b) Discuss and Take Appropriate Action on GSA Project Prioritization/Schedule**

The SAC generally supports the process and method used to generate this list and the rankings. There was some concern about overburdening staff with too many big projects in the busy first year. Blakslee expressed Staffs' confidence in the scheduled workload. It was suggested that several projects (like hydrologic model update studies) could be combined and pushed out for a couple of years when grant funding is secured. The SAC encourages the urgency for some workable resolutions to the CMA management policies for the smaller farmers.

Committee member Jaffe stressed the importance of a robust and open process for the consideration of Water Markets and Carryovers. Even if they start small and simple they should be given the time to be thoughtfully developed.

Committee member Lewis was in favor of Preliminary Investigations or Feasibility Studies as part of any major projects. Blakslee confirmed that the next step was to put a price tag on all prioritized projects for the upcoming budget development process.

Vice chair DeBranch suggested accelerating the schedule for Expanding Allocations outside the CMA because it had the highest ranking and asked why the SBCF study was prioritized when it got the lowest rank? Mr. Blakslee responded that the SBCF Investigation was included in the 2025 schedule to understand flow across the fault and the impacts to CMA and Ventucopa. He explained that looking into expanded allocations outside the CMA and Ventucopa were scheduled following the SBCF investigation once new and conclusive information is collected.

While most SAC members were in favor of developing a tiered allocation approach and/or minimum allocation policy, DeBranch was not in favor of ever considering a tiered approach.

Chair Kelly recognized the technical need for better understanding of the SBC Fault before expanding allocations to Ventucopa. He also sees the importance of various Basin Understanding studies that could greatly inform the model, such as Geo-chemical fingerprinting and age dating of pumped water.

Committee member Gaillard asked about the remaining cost for completing the SBC fault study and staff said they thought they could finish the study this year for around \$60,000 and that it would inform Ventucopa hydrology. The SBC Fault is a hydrologically impactful feature and should be better understood before management actions are taken in Ventucopa.

Stakeholder Adam Lovgren suggested that the Water Market policy was very important, and that it is likely to be complicated. He said most water markets are in basins with surface water supplies. Not as much is known about groundwater only water markets. He thought any initial CMA water market policy should be developed with the consideration of expanding to basin wide in the future.

Stakeholder Jake Furstenfield spoke in support of finishing the SBC Fault study. We have spent a lot of money there already and haven't solved the puzzle yet. It would be a shame to push back the study at this point if it will benefit the understanding of that region. We have to know the technical reasons for any expansion of allocations outside the CMA.

Committee member Jaffe supports keeping the tiered allocation policy at the top of the priority list.

The discussion then moved to the bottom of the list and what to do with the low-ranking priorities.

Committee Member Haslett commented that there are no water enhancement projects included in the high priority list, and that most projects focus on reducing water use and not on increasing water availability. He suggested that C.8. Groundwater Dependent Ecosystems Enhancement and C.10 Irrigation water runoff studies should be moved to this fiscal year.

Stakeholder John Caufield recommended that projects be binned into categories such as: What to do with what we have right now, and What can we do to make it better in the future?

Chair Kelly was in favor of reconsidering the ranking of lower priority projects annually during the budget development process and suggested Option B; to consider all items annually during the budget development period so that they don't slip from sight and can be brought forward in later budgets. A straw poll backed the proposal to review the list annually. Consensus was reached.

The remainder of the agenda was Technical and Administrative Updates with little to no discussion, except for the discussions with Legal Counsel regarding the Adjudication reported in the intro.

Respectfully submitted,

Brenton Kelly,

SAC Chair

# Cuyama Basin Groundwater Sustainability Agency Board of Directors Meeting

January 15, 2025

## Draft Meeting Minutes

**PRESENT:**

Directors

Bantilan, Cory – Chair  
Yurosek, Derek – Vice Chair  
Albano, Byron – Treasurer  
Anselm, Arne – Secretary  
Jackson, Steve  
Klinchuch, Matt – Alternate  
Reely, Blaine – Alternate  
Williams, Deborah  
Wooster, Jane  
Young, Matthew  
Zenger, Katelyn

Staff

Beck, Jim – Executive Director  
Blakslee, Taylor – Assistant Executive Director  
Dominguez, Alex – Legal Counsel  
Hughes, Joe – Legal Counsel  
Van Lienden, Brian – Woodard & Curran

**ABSENT:**

None

**1. Call to Order**

Cuyama Basin Groundwater Sustainability Agency (CBGSA) Chair Cory Bantilan called the meeting to order at 2:02 p.m.

**2. Roll Call**

Ms. Bianchi called roll (shown above) and informed Chair Bantilan that there was a quorum of the Board.

**3. Pledge of Allegiance**

The pledge of allegiance was led by Chair Bantilan.

**4. Meeting Protocols**

Mr. Blakslee provided an overview of the meeting protocols.

**5. Election of Officers**

Chair Bantilan reviewed the positions that are up for elections, which include the board chair, vice chair, treasurer, and secretary.

There was no discussion or public comments on this item.

**MOTION**

Director Albano made a motion to keep the current slate being Director Bantilan as Chair, Director Yurosek as Vice Chair, Director Albano as Treasurer, and Director Anselm as Secretary. The motion was seconded by Director Reely. A roll call vote was made and the motion passed.

AYES: Anselm, Albano, Bantilan, Jackson, Klinchuch, Reely, Young, Yurosek, Zenger  
 NOES: None  
 ABSTAIN: None  
 ABSENT: Wooster, Williams

**6. Standing Advisory Committee Meeting Report**

Meeting Date: January 9th, 2025

Submitted to the CBGSA Board of Directors on January 15th, 2025 By Brenton Kelly, SAC Chair  
 The Standing Advisory Committee met at the Family Resource Center in a hybrid format, with five Committee Members present in-person and two on the conference line with none absent. GSA Staff Taylor Blakeslee and legal counsel Alex Dominguez were present, and they were joined by Grace Bianchi, and W&C Staff on the call. Several stakeholders were in the room and on the video conference.

Public Comment was made by Robbie Jaffe with the Introduction of the newly formed Small Farmer and Rancher Network.

“Over the past few months, a network of Cuyama Basin small farmers, ranchers and small pumpers has been formed. We are funded through the technical assistance funding for small farmers under DWR and we are operating under the auspices of the Cuyama Valley Family Resource Center and the Cuyama Valley Community Association.

Our overall purpose is to have the voice of the small pumpers be represented in both the GSP and the adjudication processes with specific results that address the concerns and needs of small pumpers. Our organization has, and will continue to, meet regularly in order to understand the needs of Cuyama residents and collectively present our needs to the GSA. To date we have established a steering committee of six Cuyamans, held three community meetings and have formed partnerships with Dudek Engineering for technical assistance and with a legal clinic at UC Davis Law School, the Small Farmer Water Justice Clinic for legal guidance. We hope to work collaboratively with the GSA as we highlight the impact of policy considerations on small pumpers. We are available as a resource to the GSA and we hope you will listen to our concerns as we strive to represent the voices of small pumpers in the Cuyama Valley.”

The SAC Committee elected to continue with Brenton Kelly as Chairperson and elected to pass the Vice Chair position to Joe Haslett. The SAC unanimously recommends these Committee Members to these Officer positions for approval by the GSA Board.

The SAC then spent almost an hour on a very informative presentation and discussion which had been requested by the SAC last year re: Non-Irrigated Land Classification and Model Use.

The SAC very much appreciates the time and effort that the W&C team put into the presentation and the attention to our inquiry.

We were shown how sources for Historical Data were very sparse and infrequent. Only half of the years since 1996 (14 of 28) had Land IQ data estimates for the Historic Use calculations, and little to no ground truthing was done until very recently, and private access issues prevent most effective drive-by assessments. The statewide accuracy of 98% for Land IQ is encouraging but may not accurately reflect the diverse high desert conditions across our basin. The Committee was generally supportive of using property owner data whenever appropriate.

Committee Member Caulfield questioned the actual Cuyama ground truthing numbers? Specifically, How many ground-truth events have occurred and how many are planned? Approximately how many acres have been ground-truthed? Where has the ground-truthing generally occurred? and Have you been coordinating with landowners to access properties, or have you been restricted by public access roads? We understand that Taylor has passed those requests to the appropriate Land IQ staff for a response.

Committee member Jaffe was appreciative of the explanation of how now there is a distinction between Idle Land and Non-Irrigated active dry farming operations, when there did not use to be. Committee Member Jaffe feels strongly that there are many small and de minimis producers in the Basin that are sustainable examples and should be recognized in the Basin and in the model. Jaffe chose to use Cuyama Homegrown as an example of a highly productive local food provider and de minimus farm. Classifying these types of working lands as Non-Irrigated is neither true or provides much needed recognition for existing water-saving farming systems in the Valley..

Chair Kelly suggested that it would be helpful to distinguish within the category of Native Vegetation, between those lands being worked as Range Land and Wild Lands, both being very different types of Non-Irrigated Lands with different consumptive use. It was also suggested that perhaps the category for citrus could be replaced with cannabis.

Stakeholder Adam Lofgren asked if the model had any consideration for Irrigation efficiencies? The rest of this SAC report can be given as those items come up on this agenda.

11. a) Discuss and Take Appropriate Action on Variance Findings and Direction on Setting Final CMA Groundwater Allocations for 2025-2029

The SAC was unable to review the Ad hoc Committees recommendations by meeting time and therefore felt unable to make specific Variance application recommendations. The distinction was made between simply considering technical discrepancies and the need to consider other reasonable exceptions such as a minimum allocation or a minimum % of impact to the total allocation. A late-coming small family farm is not the cause of the overdraft and should not be put out of business when they use less water than the margin of error in the modeled calculations.

Committee Member Caulfield said that while the Variance Process gives an opportunity to address any data discrepancies between the modeled historical use calculations and actual land use data, it does not give an opportunity to address the issues of equity. Where is the opportunity to consider the value of families living in and contributing to the ecology of the Valley? To consider equity not just equality. Taylor reminded the Committee that the GSA had chosen not to consider a minimum allocation or a tiered approach, and that he does not think they will change the Policy.

Committee Member Jaffe acknowledges her frustration as she remembers the individual

exemption that the GSA was willing to give to the big new Harvard vineyard by allowing over a hundred feet of groundwater elevation draw down to insure that business success and now a small farmer's insignificant request is considered unjustified and unfair. She feels that small farmers are getting squeezed out of consideration. She thinks that Lewis Farm is an example of

the need for a small farm exemption because the variance is well within the margin of calculated error.

Committee member DeBranch expressed concern that it could be difficult to determine small from large and that it was not the job of the GSA to choose winners and losers based on their size.

The Committee heard briefly from representatives from two of the other Variance Applicants. Chair Kelly returned to the equity issue and said it comes down to scale and how a smaller operation is impacted worse by a straight % cutback than a big operation, quite quickly to the point of non-viability and bankruptcy. This is a SGMA component not currently being included. The Family farm is a beneficial Use of the highest order needing greater protections. Equity needs to be taken into account when some operations are using less water than the margin of error within Modeled calculations, but a standard cut could mean certain failure for these small operations, especially the family farms. Kelly also felt that the investments in perennial crops should be considered differently than that of annual crops.

Without the Ad hoc Recommendations to consider and with more than an hour's discussion, no SAC Recommendation was made for any specific Applicant, but was the following motion was made:

Motion: Made by Jaffe and seconded by Haslett

The SAC recommends that in addition to considering the technical data discrepancies in the variance applications, the GSA should consider the amount of the Variance and what is the impact of that % on the total Allocations of the CMA.

The motion passed with one NO vote from DeBranch who thought this was a step backwards and will send everything back to the drawing board.

11. b) Discuss and Take Appropriate Action on GSA Project Prioritization / Schedule

The SAC was asked for any edits to this list of projects.

Chair Kelly asked if the item A,3 Deep Percolation Study could also include an isotope survey and age dating with the goal to help understand how groundwater water moves horizontally in the Basin. Kelly also recognizes the need to explore the deep infiltration rate. How long does it really take for any available surface water to get down through over 400 feet of unsaturated 'Vadose Zone'? It is Kelly's understanding that the Model absurdly assumes this is an instantaneous event.

Vice Chair Haslett suggested that consideration be made for the emerging best practices for stormwater catchment and rangeland prescriptive burn/graze. He suggests collaboration with other organizations in the Santa Maria Watershed with low-cost nature-based projects across the basin. Process Based Restoration and Beaver Dam Analogues have been shown to improve groundwater elevations. Intensive prescriptive grazing and controlled burning has been used to improve groundwater conditions. Chair Kelly announced that Quail Springs has been approved for a CalFire Grant with the Ventura County Resource Conservation District as a prescribed burn site in the near future.

Chair Kelly was grateful to see the Tiered Allocation Approach (e.g. Minimum Allocation) and

said this would be a priority of the SFAR network.

Committee member DeBranch stated that he was not in favor of a tiered approach to allocations, and he felt that the Carry Over and Water Market projects needed to happen as Basin Wide Policies.

Committee member Lewis suggested that Cropping Factors could be considered as an alternative to exclusively relying on Historic Use when land use is transitioning to lower consumptive perennials.

Stakeholder Lofgren questioned the distinction between the Ranking Criteria. A definition and specific example would be helpful. For instance, what is the difference between the Impact and the Importance of a project? Is Impact the same as equity?

11, c) Discuss and Take Appropriate Action on Stormwater Capture Surface Water Rights Analysis

Legal Counsel Alex Dominguez presented a verbal report of the unpublished Draft Analysis. We were told that the State has not made the determination that the Cuyama River is fully appropriated yet by the down river water rights adjudication of the Santa Maria Basin. Staff believe that theoretically in one out of every ten years there may be 9000 Acre Feet available to divert. The required Permits are challenging, expensive and not assured. The funding for this type of project may require a Prop. 218 type vote. The estimated project cost has put a very high price on any additional acre feet of recharge.

Chair Kelly asked if a Management Area would need to be formed like a Benefit Assessment District to address that the only potential benefit would be to the region of presumed enhanced recharge. Dominguez responded that it would be more likely that everyone in the Basin would pay for the Project and the allocations would then reflect the benefit from any additional recharge that might be added to the Sustainable Yield.

Vice Chair Haslett suggested that a greater return on investment would be gained from Natural Systems Science projects like Process Based Restoration efforts that could look like GDE enhancement projects and would also serve the stormwater catchment goals of enhancing recharge.

An unofficial SAC temperature read on the viability of this project continues to be rather cold. The remaining items of the meeting were reports with very little accompanying discussion. The SAC Adjourned at 8:42

Respectfully submitted, Brenton Kelly  
SAC Chairperson

#### **7. Report from Auditors on Fiscal Year 2023-2024 Audit**

Shannon Webster from Daniells Phillips Vaughan presented the financial audit report for 2024, highlighting increased assets and liabilities and a recommendation to strengthen internal controls over the cash receipts process.

Director Yurosek asked for a more detailed explanation of the recommendation to the agency.

Ms. Webster responded that the agency lacks proper segregation of duties in the cash receipts process, creating a risk of financial misstatements. She recommended assigning segregating duties or implementing oversight controls to improve accountability.

Mr. Blakslee responded that the auditor has made this recommendation annually but noted



that financial services are xx to keep operations streamlined. He added that if the board wants to explore ways to improve segregation of duties, staff can look into potential options.

Director Yurosek asked CBGSA staff to look into the financial impact of segregating duties.

## CONSENT AGENDA

### 8-10. Consent Agenda

Chair Bantilan asked if any Directors wanted to move any of the consent items out to discuss in more detail.

#### MOTION

Director Yurosek made a motion to approve the consent agenda item nos. 8-10. The motion was seconded by Director Young. A roll call vote was made and the motion passed.

AYES:	Anselm, Albano, Bantilan, Jackson, Klinchuch, Reely, Williams, Young, Yurosek, Zenger
NOES:	None
ABSTAIN:	None
ABSENT:	Wooster

## ACTION ITEMS

### 11. Groundwater Sustainability Plan Implementation

#### a. Discuss and Take Appropriate Action on Variance Findings and Direction on Setting Final CMA Groundwater Allocations for 2025-2029

Mr. Beck reviewed the purpose and background of the variance process that was used to set final allocations for the central management area (CMA) in 2025-2029.

Mr. Blakslee reviewed the variance request process which included creating an ad hoc consisting of Directors Anselm, Albano, Young, and Jackson. He provided an overview of the variance timeline, and the steps used to update allocations. He reported that there were five (5) variance requests received.

Legal Counsel Alex Dominguez noted that while the ad hoc committee focused on technical requests, few of the variance requests also had legal implications challenging the GSA's authority to alter or determine groundwater rights. He added that the GSA addressed this in response letters, clarifying that while the Sustainable Groundwater Management Act (SGMA) does not authorize the GSA to determine groundwater rights, it does give the GSA the authority to impose groundwater allocations, as outlined in the GSP.

Mr. Blakslee provided an overview of the dairy use calculation used for the Cuyama Dairy variance request. He provided a detailed summary of proposed allocations adjustments for variance requesters. He reported that staff recommends the board approve the ad hoc variance recommendations, update the 2025-2029 allocations,

and distribute allocations to landowners. He noted that the variance requests resulted in approximately 600 acre-feet (AF) of additional estimated water use for the historic period, which resulted in a 1.5% decrease in all CMA allocations.

Chair Bantilan opened the floor for variance requesters to repeal their ad hoc recommendation to the board.

Stakeholder Morteza Touriey, representative of Daria Trust, stated only 200 acres of his 320 acres is farmable, which is the reason he requested an increase in allocations. He added that he was not able to provide additional information due to fire evacuations.

Stakeholder David Lewis asked when Stakeholder Morteza Touriey received his response letter. Stakeholder Morteza Touriey responded that he received the ad hoc letter on January 14, 2025.

Stakeholder David Lewis advocated on Stakeholder Morteza Touriey's behalf, stating that did not have adequate time to prepare a reasonable argument.

Mr. Blakslee and Mr. Dominguez explained that they met with most of the variance requesters and draft response letters were sent to requesters before the interviews. Following the interviews, additional analysis from Land IQ was conducted to finalize the technical information. They added that the timeline was tight.

Stakeholder Steve Gliessman expressed frustration that the ad hoc recommendations were not provided at the SAC meeting on January 9, 2025.

SAC Chair Brenton Kelly provided the SAC report, which is included in the board packet.

A Stakeholder from Tulare County commented that the GSA did not provide enough time for requesters and the board to review the response, and it could raise transparency issues.

Vice Chair Yurosek responded that the board received the ad hoc response letters at the same time as the public.

Stakeholder Ella Boyajian commented that the board exists to apply a humanistic approach, not just a technical and legal approach. She urged the board to consider that the Lewis family received the information the day prior and questioned whether the board should be voting on it today.

Stakeholder Blaine Morris commented that the timeline and approach may not be working for everyone, including the board also recently received the information.

Chair Bantilan closed the floor for public comments on Daria Trust and opened it to the board.

Director Reely asked how the recommendation changed after the initial draft.

Director Young (on the ad hoc committee) responded that the variance process was designed to assess whether Land IQ inaccurately estimated water usage during the historical years. The Daria variance request claimed that Land IQ underestimated water use, prompting a review that found the water usage was higher than initially estimated, increasing from 61 acre-feet to 71. However, the request was for the entire parcel, including undeveloped land, to be allocated water, which deviates from the policy of allocating based on historical use. The ad hoc committee, based on updated Land IQ data, recommended this allocation.

Legal Counsel Alex responded that once variance requests are submitted, staff and the ad hoc review the request, staff meets with the ad hoc, and then the ad hoc meets with the variance requester. Following the requester meetings, the ad hoc meets with staff to analyze the findings and additional information from the variance requesters.

Director Young commented that landowners have expressed concern in late timeline for growers to plan for the fall, but stakeholders are expressing that there is not enough time to review the data. If the process is delayed, then allocations are delayed until March.

Director Albano acknowledged the need for better policies but noted that the variance process focuses on the technical implementation of the GSP and it is not the appropriate venue for policy changes.

#### **MOTION**

Director Yurosek made a motion to follow the ad hoc recommendation to update the historic use with Land IQ crop mapping for Daria Trust, resulting in an increase in their allocation from 61.71 acre-feet (AF) to 71.50 AF. The motion was seconded by Director Albano, a roll call vote was made and passed unanimously.

AYES: Albano, Anslem, Bantilan, Klinchuch, Jackson, Reely, Williams, Wooster, Young, Yurosek, Zenger

NOES: None

ABSTAIN: None

ABSENT: None

Chair Bantilan opened the floor for comments on David Lewis's variance request.

Stakeholder Karen Lewis urged the board to reconsider their variance request and make exceptions for individual circumstances. She and her husband had invested heavily in their ranch. She explained that without a better water allocation, they would have to stop maintaining their trees, which will have significant financial impacts on their family. She commented that their neighbors with the same amount of acreage have 140 AF, while they have 24-acre feet. She added that the allocation percentage of David Lewis represents 0.6% of allocations in the Central Management

Area (CMA).

Stakeholder David Lewis argued that the Sustainable Groundwater Management Act (SGMA) was meant to regulate large agribusinesses, not harm small farmers like himself. He challenged the accuracy of the model, pointing out that its 10% margin of error exceeds his requested variance of 0.6% of the total allocation.

Stakeholder Tatiana Barlow expressed concern about the board making a decision on the variance request when the directors had only received the information yesterday. She questioned the fairness of voting on something with such limited time to review the information, and asked how the board could vote with a good conscience given the short notice. She suggested that both the board member and the variance requester were at a disadvantage due to the late information.

Stakeholder Robbie Jaffe expressed strong concerns about the board's inability or unwillingness to assess the margin of error in the groundwater model against the minimal impact of the Lewis family's water use. She emphasized that the decision was not just technical but a life-altering one for the family, particularly given the long-term investment required for permanent tree crops. She added that small farmers were not responsible for the basin's overdraft and that variances should account for that. She urged the board to approve the Lewis family's original water allocation request, as it would have little impact on the basin's sustainability but immense consequences for the family.

Stakeholder Ella Boyajian argued that the board should take a humanistic approach. She noted that small farmers like the Lewis family use a negligible amount of water compared to large pumpers. She emphasized that granting the variance won't harm sustainability but will protect a responsible, small-scale farm.

Stakeholder Jake Furstenfeld expressed frustration that the board is targeting a small family farm instead of addressing the real water overuse problem caused by large pumpers. He commented that small, sustainable farms are the future of Cuyama.

Stakeholder Kathleen March advocated for granting the Lewis's variance request. She commented on the unfair treatment of small farms like Lewis Farms, highlighting the disparity in water usage regulations between large growers and small farms. She urged the board to revise how variances are managed to prevent destroying small farms.

Stakeholder Amanda Lewis commented to take a humanistic approach to deciding on the variance request. She emphasized that their small family farm is at risk.

Stakeholder Christopher Mallard commented he supports David Lewis and his variance request. He added that SGMA grants the board discretion to approve variances without undermining sustainability. He asked the board to review the variance request and follow the SAC recommendation.

Stakeholder Ferial Sadeghian commented that denying the variance doesn't just impact one family but threatens the entire community.

Stakeholder Megan Harrington commented that this process is not fair, and she is in support of David Lewis's variance request.

Stakeholder Brenton Kelly emphasized the importance of community engagement at both the Board and SAC. He noted that there are two vacancies on the SAC. He highlighted additional policy considerations for future board discussion, including the need to accurately reflect small-scale extractions within the model, recognize and support family farms and local residents as valued community members, and explore incentives for low-water-use crops and sustainable land practices. He commented that these concerns have been repeatedly raised by stakeholders but have not yet been fully addressed in policy discussions.

Chair Bantilan closed the floor for public comment and opens it up for board discussion.

Director Wooster compared that this is a difficult decision for the board. She expressed frustration that the community didn't speak up when the board adopted a steeper glide path. She acknowledged that the Lewis family is in a tough position due to a lack of historical use but notes that no concrete solutions have been proposed. She urged community members to participate and offer suggestions on policy issues at SAC and board meetings.

Director Anselm (on the variance review ad hoc) commented that the variance process is similar to other GSAs that he works with. He explained that today's discussion was limited to technical corrections. He commented on the need for broader policy discussions on variance options in the future.

Director Young asked David Lewis about his past and projected water usage, noting that his pumping has been increasing, and he has requested additional water for expanding his orchard.

Stakeholder David Lewis responded that he pumped around 70 AF in 2024, and he would pump double the water in 2026 and 2027 as his trees mature. He estimated about 3.5 AF per acre when his trees are mature.

Director Albano commented that it would not be fair to provide exceptions for small farmers and not large pumpers. He added that the water in the basin has been declining for a long time, and Davis Lewis planted a permanent crop in 2015 in a critically over drafted basin. He commented that the board has tried to create policies and pointed out that de minimis users using less than 2 AF are not responsible to report. He commented that the solution is in the board policy, not the variance process. He commented that this is not sustainable under SGMA and growing pistachios is not sustainable long-term. He added that small farmers have a lot of alternative options to make money. He commented that providing the exemption for

the small farmers without technical justification is something that he does not support.

Stakeholder Tatiana asked how David Lewis could put energy into farmers markets if they are not able to grow crops.

Legal Counsel Alex Dominguez commented that he is guided by the policy that the board has adopted. The allocation methodology was developed over years, and it would be more appropriate to make comments during the policy discussions at past public meetings. He added that the current focus is on the variance process as previously approved, and deviating from the policy without proper procedure could expose the board to litigation and potential Brown Act violations.

Chair Bantilan commented that there are options to continue pumping but it is subject to additional charges for over pumping. He suggested that the board could potentially develop a water market as a short-term bridge, allowing landowners to share allocations.

Legal Counsel Alex Dominguez explained that SGMA authorizes water trading and carryover of water for up to five years. Some GSAs have also allowed landowners to sell their unused water allocation, though the specifics can be more limited in different areas.

Director Young asked if there is a potential short-term bridge to provide water to farmers that have had significant use cuts.

Mr. Blakslee commented that water markets would have to be within the CMA.

Legal Counsel Alex Dominguez responded that staff can be directed to develop short-term water markets.

Chair Bantilan explained that the board could direct staff to add water markets on the next agenda under agenda item 11b.

Director Wooster commented that there is a difference for water markets with planted crops vs crops that have not been planted.

Director Reely asked if the technical justification was the only consideration during the variance process.

Legal Counsel Alex Dominguez responded that the ad hoc committee's directive was to focus solely on technical aspects of the variance requests. When requesters raised legal or policy-based issues, they were told those were board-level decisions. He noted that he would not feel comfortable changing policy immediately and he suggested a potential options for a motion include: Not take action on the variance request, Direct staff to bring back proposed provisions, or Outline specific steps to address the underlying policy concerns

Director Reely commented that this policy has had unintended consequences on small farmers such as David Lewis. He suggests that the board should consider policy to address impacts on small.

Mr. Beck. suggested that the board consider directing staff to develop an interim water market to address the Lewis family's issues for the current year. He noted that developing a full water market by March is unrealistic, and he recommended working with an ad hoc group to create a short-term solution that could also help other landowners in similar situations.

Chair Bantilan expressed concerns that deviating from the established policy might open the board to litigation.

Legal Counsel Alex Dominguez stated that the action deviates from existing policy and could lead to litigation.

Director Albano asked about the difficulty to develop a simple water trading policy that allows private parties to trade water subject to board approval to provide short-term relief for landowners in need.

Mr. Beck responded that a temporary water market could be developed quickly to address immediate water shortages for landowners with permanent crops. He suggested that a simple structure could be implemented for emergency relief.

Director Wooster commented on the long-term challenges of managing water allocation in the valley, noting that many farmers are already preparing for the reality of water shortages. She commented that these issues will inevitably cause harm and need to be addressed.

**MOTION**

Director Reely made a motion to grant a one-year variance (for 2025) of up to 120 AF for David Lewis to continue his current farming practices and give time for the Board to consider policies to address these issues on a long-term basis as soon as possible. The motion was seconded by Director Anselm, a roll call vote was made and passed with 51%.

- AYES: Albano, Anselm, Klinchuch, Reely, Young
- NOES: Bantilan, Jackson, Williams, Wooster, Yurosek, Zenger
- ABSTAIN: None
- ABSENT: None

Stakeholder Dan Raytis, representative of the Hoekstras (Cuyama Dairy), stated that they have reviewed the land IQ information and recommendation. They agree with and accept the recommendation, appreciating the committee's recognition of the landowner-provided data. He noted that the dairy water use was not included in the previous model. He thanked the committee and board for their work.

**MOTION**

Director Young made a motion to follow ad hoc recommendation to update the historic use with Land IQ crop mapping for Hoekstra Dairy Farms, resulting in an increase in their allocation from 393.40 AF to 677.20 AF. The motion was seconded by Director Anselm, a roll call vote was made and passed unanimously.

- AYES: Albano, Anslem, Bantilan, Jackson, Klinchuch, Reely, Williams, Wooster, Yurosek, Young, Zenger
- NOES: None
- ABSTAIN: None
- ABSENT: None

Chair Bantilan open the floor for public comments on the Kern Ridge Variance request. There were no comments or discussions on this item.

**MOTION**

Director Young made a motion to follow ad hoc recommendation for Kern Ridge. The motion was seconded by Director Albano, a roll call vote was made and passed unanimously.

- AYES: Albano, Anslem, Bantilan, Jackson, Klinchuch, Reely, Williams, Wooster, Yurosek, Young, Zenger
- NOES: None
- ABSTAIN: None
- ABSENT: None

Stakeholder Tilden Kim spoke on behalf of Sunrise Olive Ranch. He commented that they received their final recommendation at 1:47 AM. He commented that Mr. Markman sent correspondence to Mr. Blakslee in response to receiving the ad hoc recommendation. He asked that the board delay board decision on Sunrise variance and let GSA technical staff meet with Sunrise technical staff to review. He commented on the 40% reduction in Sunrise Ranch’s water allocation over two years, which could severely impact their operations. He requested postponing the variance decision to allow technical staff to meet and reconcile the discrepancies.

Brian Van Lienden commented that the numbers provided by their technical consultant were close to the numbers provided by the model. He noted that the discrepancy doesn’t affect the variance request because the model’s historical estimates from 1998-2017 were generally close to actual reported usage, and the ranch is receiving more water than its current usage.

Director Young commented that the model is underestimating the water usage for more recent years, which is a technical issue that should be addressed in the future. He added that the variance request didn’t seem to require changes based on the current reported data.



Mr. Van Lienden clarified that the reduced allocation for Sunrise Ranch was due to changes in estimates for evapotranspiration and the increasing number of users. He confirmed that the allocation would continue to decline according to the glide path, meaning future reductions were expected.

**MOTION**

Director Young made a motion to follow ad hoc recommendation for Sunrise Olive Ranch to not change their allocations. The motion was seconded by Director Anselm, a roll call vote was made and passed unanimously.

AYES: Bantilan, Jackson, Williams, Wooster, Yurosek, Zenger Albano,  
 Anselm, Klinchuch, Reely, Williams, Young,  
 NOES: None  
 ABSTAIN: None  
 ABSENT: None

**b. Discuss and Take Appropriate Action on GSA Project Prioritization/Schedule**

Mr. Beck provided an overview of the project prioritization agenda item. Mr. Blakslee added that staff is looking for direction on which projects or actions are most important to develop a schedule for 2025-2029 and for any feedback on the process.

SAC Chair Brenton Kelly provided the SAC report on this item, which is included in the board packet.

Stakeholder Guy Lingo commented that the UC Davis could be a good resource for the GSA to help provide information about lists projects or add projects to the list, which is a free source.

Director Wooster responded that the clinic should reach out to the GSA to present information.

Stakeholder Karen Lewis requested that the water market item is considered high priority.

Director Jackson commented that the board should look at the entire basin and reduce impacts on current landowners. He thinks there should be restrictions on new wells moratorium, he would like no new owners add wells but if a landowner needs to replace a well then allow that. He asked to look at add basin-wide management.

Director Wooster asked the board to think about what the GSA’s goals are before coming up with a priority list. She requested the following projects be included 1) age-date water, 2) stop further development, 3) examine difference in water properties throughout the basin, 4) create a 3D image of the basin, 5) infiltration rate and 6) allocate water fairly.

Director Anselm commented it would be helpful to provide more information for each project so provide clarity on the goal if they would increase the sustainable yield.

Director Albano commented that water markets in the CMA, water markets and policy in

the Ventucopa MA, and water markets and policy basin-wide.

Director Yurosek commented that it is difficult to prioritize projects if the policies are not basin-wide. He would like to establish policies basin-wide. Manage the entire basin to develop policy for basin-wide and then determine allocations in the basin.

Director Wooster suggested an analysis of basin-wide management. She added that she has not seen a map of well data in the basin.

Chair Bantilan asked to add analyze basin-wide management to the list.

Director Albano commented that there is no management policy.

Mr. Blakslee clarified that staff intend to work with an ad hoc to determine what the projects will look like.

Director Williams asked for C.4. to be removed from the list because it is not something staff needs to work on.

Legal Counsel Dominguez commented that the board can provide feedback on the project list in an email.

There is consensus to remove projects that have no votes but provide directors with the opportunity to state their case for including the project.

Mr. Beck suggested having one ranking criteria.

Director Young asked if the SAC's ranking will be provided to the board prior to voting. Mr. Blakslee responded that staff could provide SAC results prior to board ranking the projects.

There was a board consensus to add all projects recommended by the SAC.

**c. Discuss and Take Appropriate Action on Stormwater Capture Surface Rights Analysis**

Legal Counsel Alex Dominguez presented the legal and technical challenges of pursuing a storm water capture project, including the need for permits and funding. A legal memorandum was provided in the board packet. He reviewed the technical analysis completed by Woodard & Curran. He provided an overview of the

Director Wooster asked if there is anyone with water rights on the river rather than a tributary.

Legal Counsel Dominguez responded that we are not adversely affecting any downstream users and the federal government, but the existing water rights owners can deny application to request water. If we can receive the permit and start construction, it would be too late for the government to take away water rights

Director Wooster asked if there were any water rights users on the Cuyama River. Mr. Van Lienden responded that there were a few people on the Cuyama River.

SAC Chair Brenton Kelly provided the SAC report on this item, which was included in the board packet.

Stakeholder Guy Lingo commented that there have been discussions on new wells and if that became a consideration, he would like to remind the board what has been previously voted on.

## REPORT ITEMS

### 12. Administrative Updates

**a. Report of the Executive Director**

Nothing to report.

**b. Report on Fiscal Year 2025-2026 Budget Schedule**

Mr. Blakslee briefly reviewed the 2025-2026 budget schedule.

**c. Report on Water Year 2024 Annual Report Schedule**

Mr. Blakslee briefly reviewed the water year 2024 annual report schedule. He noted that the land use forms are voluntary, so if forms are not provided, the GSA will default to the land use provided by Land IQ.

**d. Report of the General Counsel**

Nothing to report.

### 13. Technical Updates

**a. Update on Groundwater Sustainability Plan Activities**

Mr. Van Lienden noted that updates on GSP Activities, which is provided in the Board packet.

**b. Update on Grant-Funded Projects**

Mr. Van Lienden provided an overview on grant-funded projects, which is provided in the board packet.

**c. Update on October 2024 Groundwater Conditions Report**

Mr. Van Lienden briefly reviewed the October Groundwater Conditions Report, which is provided in the Board packet.

Director Wooster asked for staff to look into well 586.

### 14. Report of Ad Hoc Committees

Nothing to report.

### 15. Directors' Forum

Director Young introduced Walter Rubalcava, who will be his alternate on the CBGSA.

Director Wooster asked about directors discussing amongst each other on certain issues.

Legal Counsel Dominguez responded that directors cannot canvas more than quorum, which includes forwarding emails

**16. Public comment for Items Not on the Agenda**

Stakeholder Jim Wegis asked if the irrigated water allocations are specific to the parcel.

CBGSA staff responded that allocations remain with the parcel.

**17. Correspondence**

Mr. Blakslee reported the correspondence received and distributed to stakeholders.

**CLOSED SESSION**

**18. Closed Session**

At 6:34 PM, the Board adjourned to closed session. At 6:55 PM, the Board returned from closed session at which time Legal Counsel reported to the public that there was no reportable action.

**19. Adjourn**

Chair Bantilan adjourned the meeting at 6:55 PM.

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BOARD OF DIRECTORS OF THE  
CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

Chair: \_\_\_\_\_

ATTEST:

Secretary: \_\_\_\_\_

# Cuyama Basin Groundwater Sustainability Agency Board of Directors Special Meeting

January 27, 2025

## Draft Meeting Minutes

### **PRESENT:**

#### Directors

Bantilan, Cory – Chair  
Yurosek, Derek – Vice Chair  
Albano, Byron – Treasurer  
Anselm, Arne – Secretary  
Burnes, Rick  
Jackson, Steve  
Klinchuch, Matt – Alternate  
Reely, Blaine – Alternate  
Williams, Deborah  
Wooster, Jane  
Young, Matthew  
Zenger, Katelyn

#### Staff

Beck, Jim – Executive Director  
Blakslee, Taylor – Assistant Executive Director  
Warren, Jeff – Legal Counsel  
Dominguez, Alex – Legal Counsel  
Bianchi, Grace – Project Coordinator

### **ABSENT:**

None

#### **1. Call to Order**

Cuyama Basin Groundwater Sustainability Agency (CBGSA) Chair Cory Bantilan called the meeting to order at 10:00 a.m.

#### **2. Roll Call**

Ms. Bianchi called roll (shown above) and informed Chair Bantilan that there was a quorum of the Board.

#### **3. Pledge of Allegiance**

The pledge of allegiance was led by Chair Bantilan.

#### **4. Meeting Protocols**

Mr. Blakslee provided an overview of the meeting protocols.

**5. Public comment for Items Not on the Agenda**

Stakeholder Christopher Mouawad thanked the board for their vote regarding the David Lewis variance request. He was not speaking on behalf of the clinic, but he expressed that the CBGSA could be a model for the state in terms of how small farmers are represented.

**CLOSED SESSION**

**11. Closed Session**

At 10:08 AM, the Board adjourned to closed session. At 11:35 AM, the Board returned from closed session at which time Legal Counsel reported to the public that there was no reportable action.

**12. Adjourn**

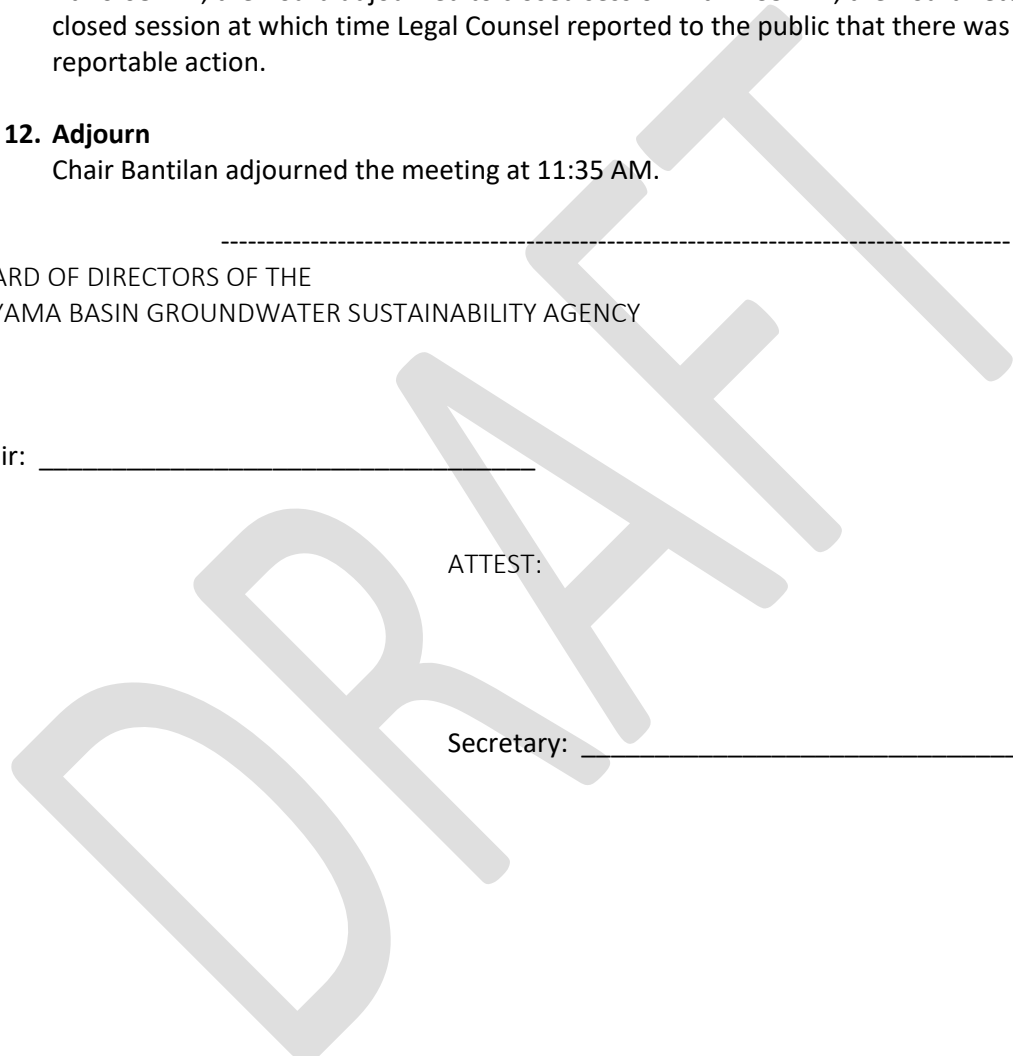
Chair Bantilan adjourned the meeting at 11:35 AM.

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BOARD OF DIRECTORS OF THE  
CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

Chair: \_\_\_\_\_

ATTEST:

Secretary: \_\_\_\_\_





TO: Board of Directors  
Agenda Item No. 8

FROM: Taylor Blakslee, Hallmark Group

DATE: March 5, 2025

SUBJECT: Approve Payment of Bills for December 2024 and January 2025

**Recommended Motion**

Approve payment of the bills for December 2024 and January 2025 in the amount of \$343,597.

**Discussion**

Consultant invoices for the months of December 2024 and January 2025 are summarized below for consideration of Board approval.

Expense	December	January	Totals
<b>Woodard &amp; Curran</b> – Technical Services	\$61,956	\$100,835	\$162,791
<b>Hallmark</b> – Executive Director services	\$11,101	\$29,344	\$ 40,445
<b>Klein</b> – Legal services	\$6,048	\$18,050	\$ 24,098
<b>Provost &amp; Pritchard</b> – Quarterly groundwater levels	\$29,179	\$11,478	\$ 40,657
<b>USGS</b> – Stream gauges	\$13,150	\$0	\$ 13,150
<b>Daniells Phillips Vaughan &amp; Bock</b> – Audit services	\$ 0	\$500	\$ 500
<b>TOTALS</b>	\$121,434	\$160,207	<b>\$343,597</b>



O: Board of Directors  
Agenda Item No. 9

FROM: Taylor Blakslee, Hallmark Group

DATE: March 5, 2025

SUBJECT: Approve Financial Reports for December 2024 and January 2025

**Recommended Motion**

Approve financial reports for December 2024 and January 2025.

**Discussion**

The Cuyama Basin Groundwater Sustainability Agency's financial report for December 2024 is provided as Attachment 1 and the financial report for January 2025 is provided as Attachment 2.

The reports include:

- Statement of Financial Position
- Receipts and Disbursements
- A/R Aging Summary
- A/P Aging Summary
- Statement of Operations with Budget Variance
- 2023/2024 Operating Budget





# **Cuyama Basin GSA**

## **Financial Statements December 2024**

**CUYAMA BASIN GSA**  
**Statement of Financial Position**  
As of December 31, 2024

	Dec 31, 24	Dec 31, 23	\$ Change	% Change
<b>ASSETS</b>				
<b>Current Assets</b>				
<b>Checking/Savings</b>				
Chase - General Checking	2,625,978	2,124,364	501,614	24%
<b>Total Checking/Savings</b>	2,625,978	2,124,364	501,614	24%
<b>Accounts Receivable</b>				
Accounts Receivable	797,746	976,298	-178,552	-18%
<b>Total Accounts Receivable</b>	797,746	976,298	-178,552	-18%
<b>Total Current Assets</b>	3,423,725	3,100,663	323,062	10%
<b>TOTAL ASSETS</b>	<b>3,423,725</b>	<b>3,100,663</b>	<b>323,062</b>	<b>10%</b>
<b>LIABILITIES &amp; EQUITY</b>				
<b>Liabilities</b>				
<b>Current Liabilities</b>				
<b>Accounts Payable</b>				
Accounts Payable	1,174,024	915,939	258,086	28%
<b>Total Accounts Payable</b>	1,174,024	915,939	258,086	28%
<b>Other Current Liabilities</b>				
New/Repl Well Deposits	3,100	2,200	900	41%
<b>Total Other Current Liabilities</b>	3,100	2,200	900	41%
<b>Total Current Liabilities</b>	1,177,124	918,139	258,986	28%
<b>Total Liabilities</b>	1,177,124	918,139	258,986	28%
<b>Equity</b>				
<b>Unrestricted Net Assets</b>	2,346,115	2,080,948	265,167	13%
<b>Net Income</b>	-99,515	101,576	-201,091	-198%
<b>Total Equity</b>	2,246,600	2,182,524	64,076	3%
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<b>3,423,725</b>	<b>3,100,663</b>	<b>323,062</b>	<b>10%</b>

**CUYAMA BASIN GSA**  
**Receipts and Disbursements**  
**As of December 31, 2024**

Type	Date	Num	Name	Debit	Credit
<b>Chase - General Checking</b>					
Payment	07/10/2024	21016	Groundwater Extraction Fees:Apache Canyon Ranch, Inc	1,639.80	
Payment	07/10/2024	6585029	Groundwater Extraction Fees:Karam Pistachio Farm	2,401.90	
Payment	07/10/2024	2723	Groundwater Extraction Fees:CCSH Farms	497.00	
Payment	07/10/2024	1529	Groundwater Extraction Fees:Brodiaea, Inc	3,991.73	
Payment	07/10/2024	438	Groundwater Extraction Fees:Bosma and Ricci	122.55	
Payment	07/10/2024	1002	Groundwater Extraction Fees:Boyajian, Tanner	40.00	
Payment	07/10/2024	556946	Groundwater Extraction Fees:Perkins Ranch	566.48	
Payment	07/10/2024	556946	Groundwater Extraction Fees:Bolthouse Land Co, LLC	39,047.19	
Payment	07/10/2024	252	Groundwater Extraction Fees:Anderson Development	10.35	
Payment	07/10/2024	22783	Groundwater Extraction Fees:Cuyama Orchards, Inc	4,376.09	
Payment	07/10/2024	8418	Groundwater Extraction Fees:Buck, Ann	522.00	
Payment	07/10/2024	2251	Groundwater Extraction Fees:Highland Vineyard SB, LLC	9,160.00	
Payment	07/10/2024	525138	Groundwater Extraction Fees:E & B Natural Resources Mgmt ...	121.75	
Payment	07/24/2024	806	Groundwater Extraction Fees:Lewis, David	177.06	
Payment	07/24/2024	511533	Groundwater Extraction Fees:Grimmway Enterprises, Inc	61,259.40	
Payment	07/24/2024	1739	Groundwater Extraction Fees:Caliente Ranch	22.38	
Deposit	07/24/2024	134526	Farm Pump and Irrigation Co.	1,200.00	
Payment	07/24/2024	2776	Groundwater Extraction Fees:Adam Family	16.94	
Payment	07/24/2024	10332	Groundwater Extraction Fees:JHP Global, Inc	1,826.40	
Bill Pmt -Check	07/31/2024	1183	BC2 Environmental		237,303.32
Payment	08/13/2024	84237	Groundwater Extraction Fees:H Lima Company	12.38	
Payment	08/13/2024	808	Groundwater Extraction Fees:Lewis, David	10.00	
Payment	08/13/2024	557015	Groundwater Extraction Fees:Lear Real Estate Ent LLC	2,841.05	
Payment	08/13/2024	10364	Groundwater Extraction Fees:JHP Global, Inc	182.64	
Bill Pmt -Check	08/21/2024		Klein DeNatale Goldner	0.00	
Payment	09/06/2024	53066	Groundwater Extraction Fees:Cuyama Dairy Farm	1,153.63	
Payment	09/30/2024	557682	Groundwater Extraction Fees:Lear Real Estate Ent LLC	284.11	
Payment	09/30/2024	53134	Groundwater Extraction Fees:Cuyama Dairy Farm	115.37	
Payment	09/30/2024	05-523675	Department of Water Resources	531,145.52	
Check	10/03/2024	Svc Fee	Chase Bank		95.00
Bill Pmt -Check	10/09/2024	1184	BC2 Environmental		315,353.70
Bill Pmt -Check	10/09/2024	1185	HGCPM, Inc.		22,670.41
Bill Pmt -Check	10/09/2024	1186	Klein DeNatale Goldner		13,846.42
Bill Pmt -Check	10/09/2024	1187	Provost & Pritchard Consulting Group		728.00
Bill Pmt -Check	10/09/2024	1188	U.S. Geological Survey		13,150.00
Bill Pmt -Check	10/09/2024	1189	Woodard & Curran Inc		187,468.18
Payment	11/27/2024	05-579377	Department of Water Resources	1,430,117.16	
Bill Pmt -Check	11/27/2024	1190	BC2 Environmental		443,384.91
Bill Pmt -Check	11/27/2024	1191	Daniells Phillips Vaughan & Bock		9,000.00
Bill Pmt -Check	11/27/2024	1192	HGCPM, Inc.		79,444.30
Bill Pmt -Check	11/27/2024	1193	Klein DeNatale Goldner		45,136.44
Bill Pmt -Check	11/27/2024	1194	Provost & Pritchard Consulting Group		17,850.50
Bill Pmt -Check	11/27/2024	1195	U.S. Geological Survey		13,150.00
Bill Pmt -Check	11/27/2024	1196	Woodard & Curran Inc		783,998.61
Payment	12/31/2024	05-606910	Department of Water Resources	2,528,410.54	
Total Chase - General Checking				4,621,271.42	2,182,579.79
<b>TOTAL</b>				<b>4,621,271.42</b>	<b>2,182,579.79</b>

**CUYAMA BASIN GSA  
A/R Aging Summary  
As of December 31, 2024**

	<u>Current</u>	<u>1 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>&gt; 90</u>	<u>TOTAL</u>
<b>Department of Water Resources Groundwater Extraction Fees</b>	372,835	0	0	0	0	372,835
Adam Family	0	0	0	0	2	2
Duncan Family Farms	0	0	0	0	424,909	424,909
<b>Total Groundwater Extraction Fees</b>	0	0	0	0	424,911	424,911
<b>TOTAL</b>	<u>372,835</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>424,911</u>	<u>797,746</u>

**CUYAMA BASIN GSA  
A/P Aging Summary  
As of December 31, 2024**

	<u>Current</u>	<u>1 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>&gt; 90</u>	<u>TOTAL</u>
BC2 Environmental	0	0	0	0	339,953	339,953
HGCPM, Inc.	11,101	0	20,188	30,185	50,186	111,660
Klein DeNatale Goldner	6,048	0	19,336	6,669	44,739	76,792
Provost & Pritchard Consulting Group	29,179	0	0	0	6,535	35,714
U.S. Geological Survey	13,150	0	0	0	0	13,150
Woodard & Curran Inc	61,956	0	76,563	134,540	323,697	596,756
<b>TOTAL</b>	<b><u>121,434</u></b>	<b><u>0</u></b>	<b><u>116,087</u></b>	<b><u>171,394</u></b>	<b><u>765,109</u></b>	<b><u>1,174,024</u></b>

# CUYAMA BASIN GSA

## Statement of Operations with Budget Variance

July through December 2024

	Jul - Dec 24	Budget	\$ Over Budget	% of Budget
<b>Ordinary Income/Expense</b>				
<b>Income</b>				
<b>Direct Public Funds</b>				
Groundwater Extraction Fees	171,177	175,000	-3,823	98%
Grant Reimbursements	1,436,918	1,006,000	430,918	143%
GWE Late Fees	604	0	604	100%
<b>Total Direct Public Funds</b>	1,608,699	1,181,000	427,699	136%
<b>Total Income</b>	1,608,699	1,181,000	427,699	136%
<b>Cost of Goods Sold</b>				
<b>Program Expenses</b>				
<b>Technical Consulting</b>				
Monitoring Network Enhancements	595,172	497,383	97,789	120%
GSP Implementation - W&C	68,686	107,622	-38,936	64%
Stakeholder Engagement	101,377	72,450	28,927	140%
Technical Support for DWR	0	10,500	-10,500	0%
Outreach	7,560	19,034	-11,474	40%
Grant Proposals	0	22,050	-22,050	0%
Grant Administration	57,165	52,500	4,665	109%
Improve Basin Water Use Info	17,085	37,800	-20,715	45%
Project & Mgmt Action Impl	75,858	67,200	8,658	113%
5 Year GSP Update - Technical	343,560	309,802	33,758	111%
Fault Investigation	118,331	121,867	-3,536	97%
Well Permit Review - Technical	0	6,300	-6,300	0%
GSP Development	0	21,000	-21,000	0%
<b>Total Technical Consulting</b>	1,384,794	1,345,508	39,286	103%
<b>Other Technical Consulting</b>				
Monitoring Network	42,647	34,004	8,643	125%
Stream Gauge Maintenance	26,300	28,324	-2,024	93%
<b>Total Other Technical Consulting</b>	68,947	62,328	6,619	111%
<b>Total Program Expenses</b>	1,453,741	1,407,836	45,905	103%
<b>Total COGS</b>	1,453,741	1,407,836	45,905	103%
<b>Gross Profit</b>	154,959	-226,836	381,795	-68%
<b>Expense</b>				
<b>General and Administrative</b>				
<b>Executive Director</b>				
Board Meetings	70,569	70,000	569	101%
Consult Mgmt and GSP Devel	31,119	36,792	-5,673	85%
Financial Information Coor	27,250	23,791	3,459	115%
Funding - GWE Fees	3,488	1,800	1,688	194%
Outreach	16,306	5,925	10,381	275%
Adjudication Support	1,825	1,070	755	171%
Management Area Admin	5,425	6,501	-1,076	83%
5-Year GSP Update - Admin	0	10,063	-10,063	0%
Water Use Enforcement	88	12,710	-12,623	1%
Well Permit Review - Admin	0	998	-998	0%
Travel and Direct Costs	1,741	2,446	-705	71%
<b>Total Executive Director</b>	157,810	172,096	-14,286	92%

**CUYAMA BASIN GSA**  
**Statement of Operations with Budget Variance**  
 July through December 2024

	Jul - Dec 24	Budget	\$ Over Budget	% of Budget
<b>Other Administrative</b>				
<b>Legal</b>	82,787	125,002	-42,216	66%
<b>Audit Fees</b>	9,000	10,000	-1,000	90%
<b>Bank Service Fees</b>	95	0	95	100%
<b>Printing and Copying</b>	2,104	0	2,104	100%
<b>Other Admin Expense</b>	2,135	0	2,135	100%
<b>Postage</b>	543	0	543	100%
<b>Contingency</b>	0	9,998	-9,998	0%
<b>Total Other Administrative</b>	96,664	145,000	-48,336	67%
<b>Total General and Administrative</b>	254,473	317,096	-62,623	80%
<b>Total Expense</b>	254,473	317,096	-62,623	80%
<b>Net Ordinary Income</b>	-99,515	-543,932	444,417	18%
<b>Net Income</b>	-99,515	-543,932	444,417	18%

**CUYAMA BASIN GSA**  
**FY 24/25 Budget**  
 July 2024 - June 2025

	<b>Jul '24 - Jun 25</b>
<b>Ordinary Income/Expense</b>	
<b>Income</b>	
<b>Direct Public Funds</b>	
Groundwater Extraction Fees	175,000
Grant Reimbursements	1,670,000
<b>Total Direct Public Funds</b>	1,845,000
<b>Total Income</b>	1,845,000
<b>Cost of Goods Sold</b>	
<b>Program Expenses</b>	
<b>Technical Consulting</b>	
Monitoring Network Enhancements	497,383
GSP Implementation - W&C	215,250
Stakeholder Engagement	114,450
Technical Support for DWR	21,000
Outreach	30,410
Grant Proposals	44,100
Grant Administration	105,000
Improve Basin Water Use Info	75,600
Project & Mgmt Action Impl	134,400
5 Year GSP Update - Technical	309,802
Fault Investigation	121,867
Well Permit Review - Technical	12,600
GSP Development	42,000
<b>Total Technical Consulting</b>	1,723,862
<b>Other Technical Consulting</b>	
Monitoring Network	68,000
Stream Gauge Maintenance	56,650
<b>Total Other Technical Consulting</b>	124,650
<b>Total Program Expenses</b>	1,848,512
<b>Total COGS</b>	1,848,512
<b>Gross Profit</b>	-3,512
<b>Expense</b>	
<b>General and Administrative</b>	
<b>Executive Director</b>	
Board Meetings	110,990
Consult Mgmt and GSP Devel	73,578
Financial Information Coor	47,587
Funding - GWE Fees	5,830
Outreach	11,847
Adjudication Support	2,138
Management Area Admin	13,005
5-Year GSP Update - Admin	20,131
Water Use Enforcement	25,400
Well Permit Review - Admin	2,000
Travel and Direct Costs	4,894
<b>Total Executive Director</b>	317,400
<b>Other Administrative</b>	
Legal	250,000
Insurance Policies	17,000
Audit Fees	10,000
Printing and Copying	4,000
Other Admin Expense	200
Contingency	20,000
<b>Total Other Administrative</b>	301,200
<b>Total General and Administrative</b>	618,600
<b>Total Expense</b>	618,600
<b>Net Ordinary Income</b>	-622,112
<b>Net Income</b>	-622,112

Note: The FY24/25 Budget Includes Woodard & Curran Contract Amendments 1 and 2





# **Cuyama Basin GSA**

## **Financial Statements January 2025**

**CUYAMA BASIN GSA**  
**Statement of Financial Position**  
As of January 31, 2025

	Jan 31, 25	Jan 31, 24	\$ Change	% Change
<b>ASSETS</b>				
<b>Current Assets</b>				
<b>Checking/Savings</b>				
Chase - General Checking	1,573,388	1,426,747	146,640	10%
<b>Total Checking/Savings</b>	1,573,388	1,426,747	146,640	10%
<b>Accounts Receivable</b>				
Accounts Receivable	797,746	976,298	-178,552	-18%
<b>Total Accounts Receivable</b>	797,746	976,298	-178,552	-18%
<b>Total Current Assets</b>	2,371,134	2,403,046	-31,912	-1%
<b>TOTAL ASSETS</b>	<b>2,371,134</b>	<b>2,403,046</b>	<b>-31,912</b>	<b>-1%</b>
<b>LIABILITIES &amp; EQUITY</b>				
<b>Liabilities</b>				
<b>Current Liabilities</b>				
<b>Accounts Payable</b>				
Accounts Payable	281,741	492,807	-211,066	-43%
<b>Total Accounts Payable</b>	281,741	492,807	-211,066	-43%
<b>Other Current Liabilities</b>				
New/Repl Well Deposits	3,100	2,200	900	41%
<b>Total Other Current Liabilities</b>	3,100	2,200	900	41%
<b>Total Current Liabilities</b>	284,841	495,007	-210,166	-43%
<b>Total Liabilities</b>	284,841	495,007	-210,166	-43%
<b>Equity</b>				
<b>Unrestricted Net Assets</b>	2,346,115	2,080,948	265,167	13%
<b>Net Income</b>	-259,822	-172,910	-86,912	-50%
<b>Total Equity</b>	2,086,293	1,908,039	178,255	9%
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<b>2,371,134</b>	<b>2,403,046</b>	<b>-31,912</b>	<b>-1%</b>

**CUYAMA BASIN GSA**  
**Receipts and Disbursements**  
**As of January 31, 2025**

Type	Date	Num	Name	Debit	Credit
<b>Chase - General Checking</b>					
Payment	07/10/2024	21016	Groundwater Extraction Fees:Apache Canyon Ranch, Inc	1,639.80	
Payment	07/10/2024	6585029	Groundwater Extraction Fees:Karam Pistachio Farm	2,401.90	
Payment	07/10/2024	2723	Groundwater Extraction Fees:CCSH Farms	497.00	
Payment	07/10/2024	1529	Groundwater Extraction Fees:Brodiaea, Inc	3,991.73	
Payment	07/10/2024	438	Groundwater Extraction Fees:Bosma and Ricci	122.55	
Payment	07/10/2024	1002	Groundwater Extraction Fees:Boyajian, Tanner	40.00	
Payment	07/10/2024	556946	Groundwater Extraction Fees:Perkins Ranch	566.48	
Payment	07/10/2024	556946	Groundwater Extraction Fees:Bolthouse Land Co, LLC	39,047.19	
Payment	07/10/2024	252	Groundwater Extraction Fees:Anderson Development	10.35	
Payment	07/10/2024	22783	Groundwater Extraction Fees:Cuyama Orchards, Inc	4,376.09	
Payment	07/10/2024	8418	Groundwater Extraction Fees:Buck, Ann	522.00	
Payment	07/10/2024	2251	Groundwater Extraction Fees:Highland Vineyard SB, LLC	9,160.00	
Payment	07/10/2024	525138	Groundwater Extraction Fees:E & B Natural Resources Mgmt ...	121.75	
Payment	07/24/2024	806	Groundwater Extraction Fees:Lewis, David	177.06	
Payment	07/24/2024	511533	Groundwater Extraction Fees:Grimmway Enterprises, Inc	61,259.40	
Payment	07/24/2024	1739	Groundwater Extraction Fees:Caliente Ranch	22.38	
Deposit	07/24/2024	134526	Farm Pump and Irrigation Co.	1,200.00	
Payment	07/24/2024	2776	Groundwater Extraction Fees:Adam Family	16.94	
Payment	07/24/2024	10332	Groundwater Extraction Fees:JHP Global, Inc	1,826.40	
Bill Pmt -Check	07/31/2024	1183	BC2 Environmental		237,303.32
Payment	08/13/2024	84237	Groundwater Extraction Fees:H Lima Company	12.38	
Payment	08/13/2024	808	Groundwater Extraction Fees:Lewis, David	10.00	
Payment	08/13/2024	557015	Groundwater Extraction Fees:Lear Real Estate Ent LLC	2,841.05	
Payment	08/13/2024	10364	Groundwater Extraction Fees:JHP Global, Inc	182.64	
Bill Pmt -Check	08/21/2024		Klein DeNatale Goldner	0.00	
Payment	09/06/2024	53066	Groundwater Extraction Fees:Cuyama Dairy Farm	1,153.63	
Payment	09/30/2024	557682	Groundwater Extraction Fees:Lear Real Estate Ent LLC	284.11	
Payment	09/30/2024	53134	Groundwater Extraction Fees:Cuyama Dairy Farm	115.37	
Payment	09/30/2024	05-523675	Department of Water Resources	531,145.52	
Check	10/03/2024	Svc Fee	Chase Bank		95.00
Bill Pmt -Check	10/09/2024	1184	BC2 Environmental		315,353.70
Bill Pmt -Check	10/09/2024	1185	HGCPM, Inc.		22,670.41
Bill Pmt -Check	10/09/2024	1186	Klein DeNatale Goldner		13,846.42
Bill Pmt -Check	10/09/2024	1187	Provost & Pritchard Consulting Group		728.00
Bill Pmt -Check	10/09/2024	1188	U.S. Geological Survey		13,150.00
Bill Pmt -Check	10/09/2024	1189	Woodard & Curran Inc		187,468.18
Payment	11/27/2024	05-579377	Department of Water Resources	1,430,117.16	
Bill Pmt -Check	11/27/2024	1190	BC2 Environmental		443,384.91
Bill Pmt -Check	11/27/2024	1191	Daniells Phillips Vaughan & Bock		9,000.00
Bill Pmt -Check	11/27/2024	1192	HGCPM, Inc.		79,444.30
Bill Pmt -Check	11/27/2024	1193	Klein DeNatale Goldner		45,136.44
Bill Pmt -Check	11/27/2024	1194	Provost & Pritchard Consulting Group		17,850.50
Bill Pmt -Check	11/27/2024	1195	U.S. Geological Survey		13,150.00
Bill Pmt -Check	11/27/2024	1196	Woodard & Curran Inc		783,998.61
Payment	12/31/2024	05-606910	Department of Water Resources	2,528,410.54	
Bill Pmt -Check	01/15/2025	1197	BC2 Environmental		339,952.50
Bill Pmt -Check	01/15/2025	1198	HGCPM, Inc.		100,558.88
Bill Pmt -Check	01/15/2025	1199	Klein DeNatale Goldner		70,744.09
Bill Pmt -Check	01/15/2025	1200	Provost & Pritchard Consulting Group		6,535.20
Bill Pmt -Check	01/15/2025	1201	Woodard & Curran Inc		534,800.15
Total Chase - General Checking				4,621,271.42	3,235,170.61
<b>TOTAL</b>				<b>4,621,271.42</b>	<b>3,235,170.61</b>

**CUYAMA BASIN GSA  
A/R Aging Summary  
As of January 31, 2025**

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
Department of Water Resources	0	0	372,835	0	0	372,835
Groundwater Extraction Fees						
Adam Family	0	0	0	0	2	2
Duncan Family Farms	0	0	0	0	424,909	424,909
<b>Total Groundwater Extraction Fees</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>424,911</b>	<b>424,911</b>
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>372,835</b>	<b>0</b>	<b>424,911</b>	<b>797,746</b>

**CUYAMA BASIN GSA  
A/P Aging Summary  
As of January 31, 2025**

	<u>Current</u>	<u>1 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>&gt; 90</u>	<u>TOTAL</u>
CA Assoc of Mutual Water Companies	0	100	0	0	0	100
Daniells Phillips Vaughan & Bock	500	0	0	0	0	500
HGCPM, Inc.	29,344	0	11,101	0	0	40,445
Klein DeNatale Goldner	18,050	0	6,048	0	0	24,097
Provost & Pritchard Consulting Group	11,478	0	29,179	0	0	40,657
U.S. Geological Survey	0	0	13,150	0	0	13,150
Woodard & Curran Inc	100,835	0	61,956	0	0	162,792
<b>TOTAL</b>	<b><u>160,207</u></b>	<b><u>100</u></b>	<b><u>121,434</u></b>	<b><u>0</u></b>	<b><u>0</u></b>	<b><u>281,741</u></b>

**CUYAMA BASIN GSA**  
**Statement of Operations with Budget Variance**  
July 2024 through January 2025

	Jul '24 - Jan 25	Budget	\$ Over Budget	% of Budget
<b>Ordinary Income/Expense</b>				
<b>Income</b>				
<b>Direct Public Funds</b>				
Groundwater Extraction Fees	171,177	175,000	-3,823	98%
Grant Reimbursements	1,436,918	1,006,000	430,918	143%
GWE Late Fees	604	0	604	100%
<b>Total Direct Public Funds</b>	1,608,699	1,181,000	427,699	136%
<b>Total Income</b>	1,608,699	1,181,000	427,699	136%
<b>Cost of Goods Sold</b>				
<b>Program Expenses</b>				
<b>Technical Consulting</b>				
Monitoring Network Enhancements	597,186	497,383	99,803	120%
GSP Implementation - W&C	84,240	125,560	-41,320	67%
Stakeholder Engagement	110,396	79,450	30,946	139%
Technical Support for DWR	0	12,250	-12,250	0%
Outreach	7,560	20,930	-13,370	36%
Grant Proposals	0	25,725	-25,725	0%
Grant Administration	71,263	62,500	8,763	114%
Improve Basin Water Use Info	24,905	44,100	-19,195	56%
Project & Mgmt Action Impl	119,342	78,400	40,942	152%
5 Year GSP Update - Technical	351,785	309,802	41,983	114%
Fault Investigation	118,952	121,867	-2,915	98%
Well Permit Review - Technical	0	7,350	-7,350	0%
GSP Development	0	24,500	-24,500	0%
<b>Total Technical Consulting</b>	1,485,629	1,409,817	75,812	105%
<b>Other Technical Consulting</b>				
Monitoring Network	54,125	39,670	14,455	136%
Stream Gauge Maintenance	26,300	28,324	-2,024	93%
<b>Total Other Technical Consulting</b>	80,425	67,994	12,431	118%
<b>Total Program Expenses</b>	1,566,054	1,477,811	88,243	106%
<b>Total COGS</b>	1,566,054	1,477,811	88,243	106%
<b>Gross Profit</b>	42,645	-296,811	339,456	-14%
<b>Expense</b>				
<b>General and Administrative</b>				
<b>Executive Director</b>				
Board Meetings	87,138	70,000	17,138	124%
Consult Mgmt and GSP Devel	35,306	42,923	-7,617	82%
Financial Information Coor	30,019	27,757	2,262	108%
Funding - GWE Fees	4,625	1,800	2,825	257%
Outreach	16,306	6,912	9,394	236%
Adjudication Support	1,825	1,248	577	146%
Management Area Admin	8,369	7,585	784	110%
5-Year GSP Update - Admin	0	11,741	-11,741	0%
Water Use Enforcement	88	14,825	-14,738	1%
Well Permit Review - Admin	0	1,165	-1,165	0%
Travel and Direct Costs	2,146	2,854	-708	75%
<b>Total Executive Director</b>	185,821	188,810	-2,989	98%

**CUYAMA BASIN GSA**  
**Statement of Operations with Budget Variance**  
July 2024 through January 2025

	Jul '24 - Jan 25	Budget	\$ Over Budget	% of Budget
<b>Other Administrative</b>				
Legal	100,689	145,835	-45,146	69%
Audit Fees	9,500	10,000	-500	95%
Bank Service Fees	95	0	95	100%
Printing and Copying	3,437	2,000	1,437	172%
Other Admin Expense	2,382	200	2,182	1,191%
Postage	543	0	543	100%
Contingency	0	11,665	-11,665	0%
<b>Total Other Administrative</b>	116,646	169,700	-53,054	69%
<b>Total General and Administrative</b>	302,467	358,510	-56,043	84%
<b>Total Expense</b>	302,467	358,510	-56,043	84%
<b>Net Ordinary Income</b>	-259,822	-655,321	395,499	40%
<b>Net Income</b>	<b>-259,822</b>	<b>-655,321</b>	<b>395,499</b>	<b>40%</b>

**CUYAMA BASIN GSA**  
**FY 24/25 Budget**  
 July 2024 - June 2025

	<b>Jul '24 - Jun 25</b>
<b>Ordinary Income/Expense</b>	
<b>Income</b>	
<b>Direct Public Funds</b>	
Groundwater Extraction Fees	175,000
Grant Reimbursements	1,670,000
<b>Total Direct Public Funds</b>	1,845,000
<b>Total Income</b>	1,845,000
<b>Cost of Goods Sold</b>	
<b>Program Expenses</b>	
<b>Technical Consulting</b>	
Monitoring Network Enhancements	497,383
GSP Implementation - W&C	215,250
Stakeholder Engagement	114,450
Technical Support for DWR	21,000
Outreach	30,410
Grant Proposals	44,100
Grant Administration	105,000
Improve Basin Water Use Info	75,600
Project & Mgmt Action Impl	134,400
5 Year GSP Update - Technical	309,802
Fault Investigation	121,867
Well Permit Review - Technical	12,600
GSP Development	42,000
<b>Total Technical Consulting</b>	1,723,862
<b>Other Technical Consulting</b>	
Monitoring Network	68,000
Stream Gauge Maintenance	56,650
<b>Total Other Technical Consulting</b>	124,650
<b>Total Program Expenses</b>	1,848,512
<b>Total COGS</b>	1,848,512
<b>Gross Profit</b>	-3,512
<b>Expense</b>	
<b>General and Administrative</b>	
<b>Executive Director</b>	
Board Meetings	110,990
Consult Mgmt and GSP Devel	73,578
Financial Information Coor	47,587
Funding - GWE Fees	5,830
Outreach	11,847
Adjudication Support	2,138
Management Area Admin	13,005
5-Year GSP Update - Admin	20,131
Water Use Enforcement	25,400
Well Permit Review - Admin	2,000
Travel and Direct Costs	4,894
<b>Total Executive Director</b>	317,400
<b>Other Administrative</b>	
Legal	250,000
Insurance Policies	17,000
Audit Fees	10,000
Printing and Copying	4,000
Other Admin Expense	200
Contingency	20,000
<b>Total Other Administrative</b>	301,200
<b>Total General and Administrative</b>	618,600
<b>Total Expense</b>	618,600
<b>Net Ordinary Income</b>	-622,112
<b>Net Income</b>	-622,112

Note: The FY24/25 Budget Includes Woodard & Curran Contract Amendments 1 and 2





TO: Board of Directors  
Agenda Item No. 10

FROM: Desert Research Institute

DATE: March 5, 2025

SUBJECT: Presentation on Cloud Seeding Study

**Recommended Motion**

Board feedback requested.

**Discussion**

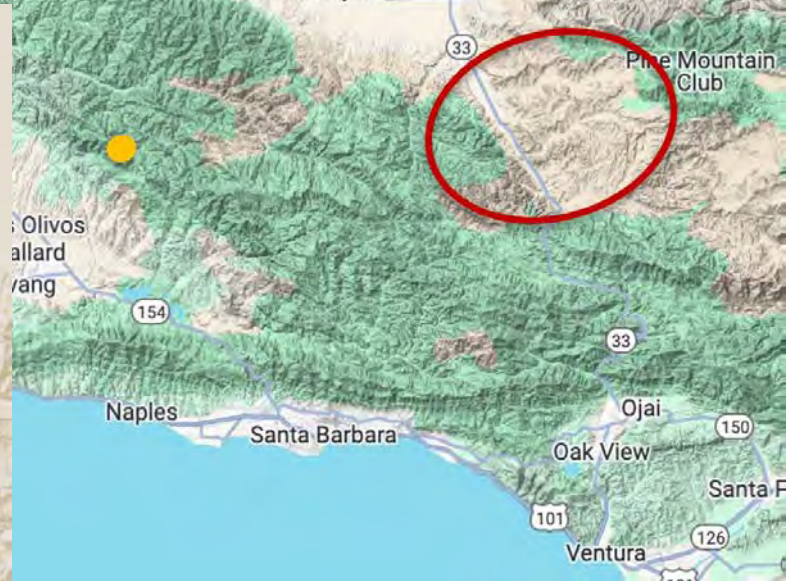
In section 7.4.2 of the Cuyama Basin Groundwater Sustainability Agency (CBGSA) Groundwater Sustainability Plan (GSP), precipitation enhancement within the Basin is listed as a potential project. An overview and report on the Cloud Seeding Study from the Desert Research Institute are provided as **Attachment 1** and **Attachment 2**, respectively.

# Assessing the Cloud Seeding Effects from the Santa Barbara County Cloud Seeding Program on the Cuyama Valley

Frank McDonough

Desert Research Institute

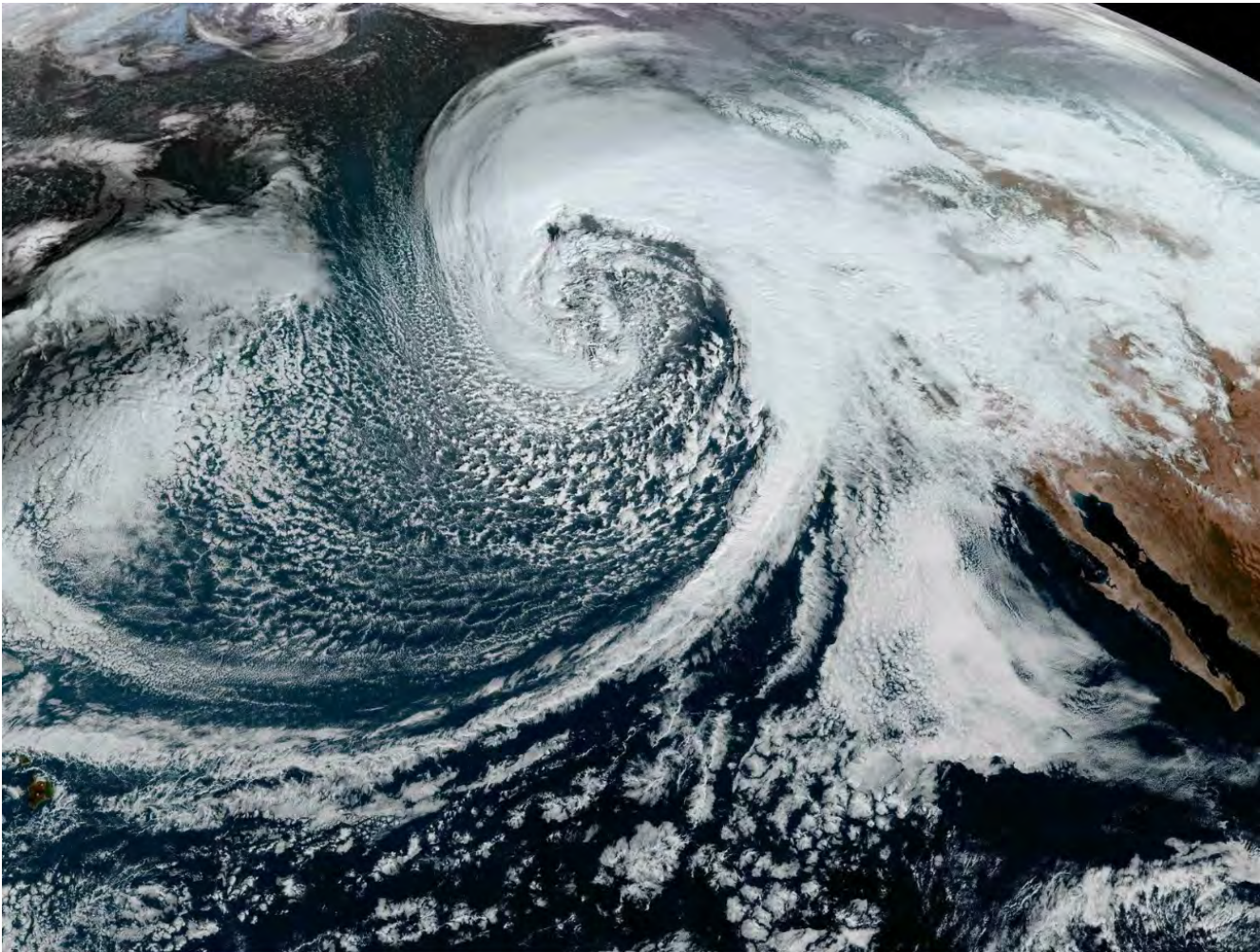
# The Cuyama River Headwaters





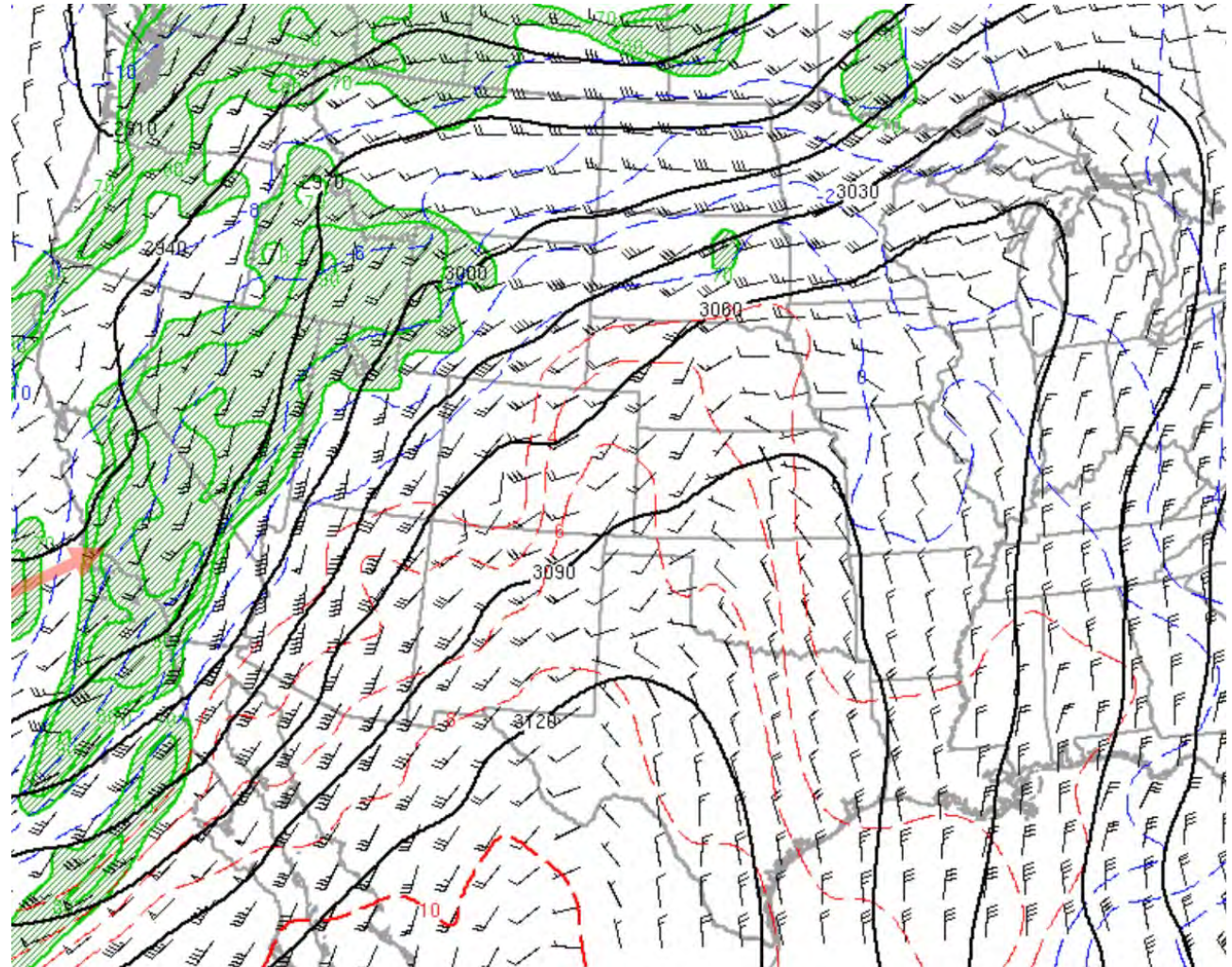
# Winter storms moving off the Pacific produce clouds and precipitation impacting the Cuyama Headwaters

48





# The freezing levels during these winter storms typically range from 6,000' MSL to 12,000' MSL <sup>49</sup>



The 10,000' MSL temperatures during February 16, 2024 storm.

Cloud temperatures at 10,000' MSL over the headwaters are -8C (17F)



# Subfreezing clouds, colder than 0C (32F)<sup>50</sup>

- Subfreezing clouds can contain liquid water drops and/or ice crystals.
- When ice crystals and liquid drops are both present in the same clouds the ice crystals will grow into precipitating snow at the liquid drops expense.
- Special, relatively rare ice forming dust particles are necessary to initiate ice crystal formation (IN). These don't become active until cloud temperatures are colder than about -15°C (5°F).
- Clouds warmer than -15°C (5°F) have low IN concentrations are less efficient at precipitation production, they will also have cloud seeding conditions.



# Cloud Seeding of Winter Clouds <sup>51</sup>

- Introduce special IN into subfreezing cloud layers warmer than  $-15^{\circ}\text{C}$  ( $+5^{\circ}\text{F}$ ) that contain subfreezing liquid water drops.
- The dust provides a crystalline structure for embryonic ice crystals form.
- The embryonic Ice crystals will grow and deplete cloud drops, forming snow (rain), which will as snow or melt in rain and fall as increased precipitation.



Liquid water drop clouds  
below freezing



Seed -> Introduce ice  
and form snowflakes



Create  
additional  
snowfall

# How is cloud seeding done

- Silver Iodide (AgI) dust is introduced into subfreezing clouds with liquid water drops.
- The AgI dust causes ice to form at warmer temperatures (below 23°F) than clouds without AgI.
- The co-existing subfreezing liquid water drops will freeze to the newly formed ice crystals and increase snowfall.



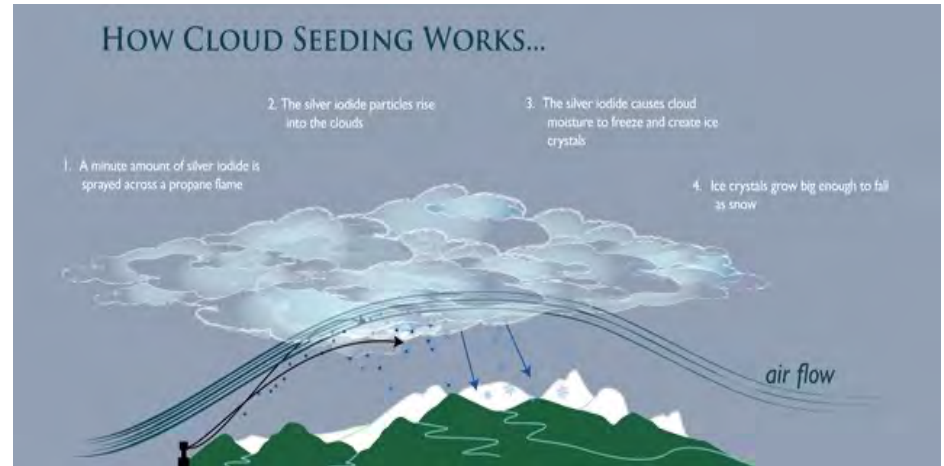
Silver Iodide (AgI) – naturally occurring rock



# Two primary methods to cloud seed 53

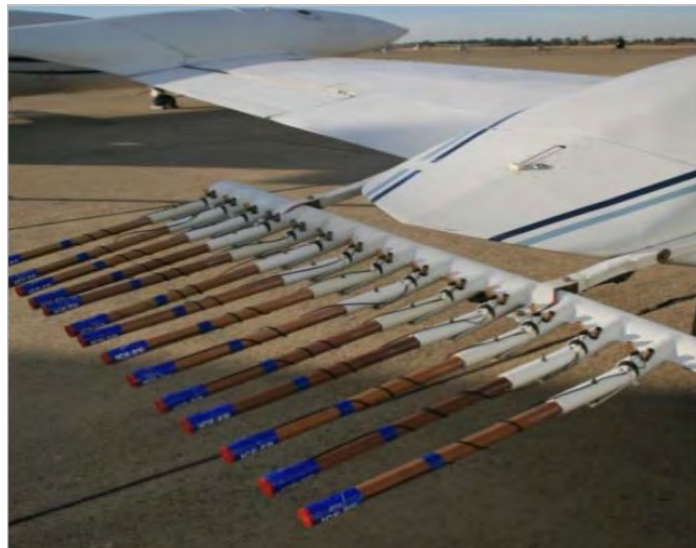
- Ground based

- All seedable times of storms can be targeted for extra snowfall
- Need clouds, winds and temperatures to be favorable

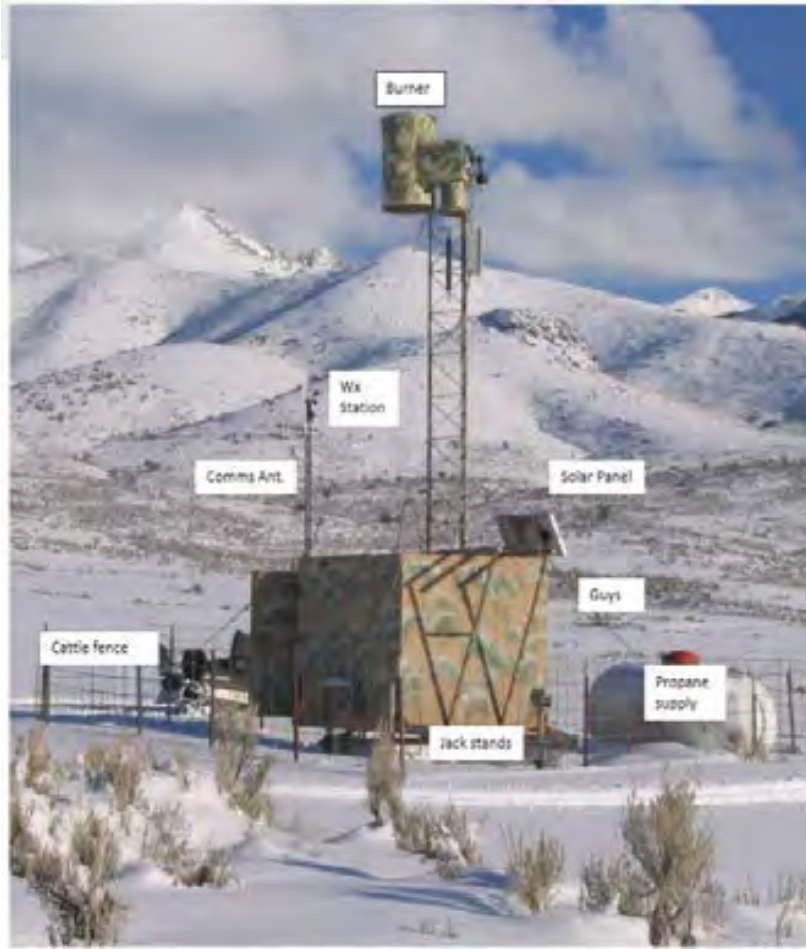


- Aircraft

- Best cloud locations and altitudes can be seeded and seeding area can be adjusted
- Only 2-4 hour blocks can be seeded without refueling



# DRI Cloud Remote Cloud Seeding Generator <sup>54</sup>



Remote controlled high altitude cloud seeder  
- fully contained



150 to 200 hours of seeding –  
3,000 to 6,000 acre feet



Modern  
electronics and  
satellite  
communications

# Tasks for the Study

- Task 1
  - Create a High-Resolution Model Cloud Seeding Climatology to Assess the Potential to Cloud Seeding the Cuyama River Headwaters
- Task 2
  - Test precipitation chemistry to determine if the existing Santa Barbara County Cloud Seeding Program is impacting the Headwaters.
- Task 3
  - Potential Precipitation Increases and Hypothetical Project Design





# Santa Barbara County Cloud Seeding Program

Twitctell Target Area:  
Lower Cuyama  
Watershed



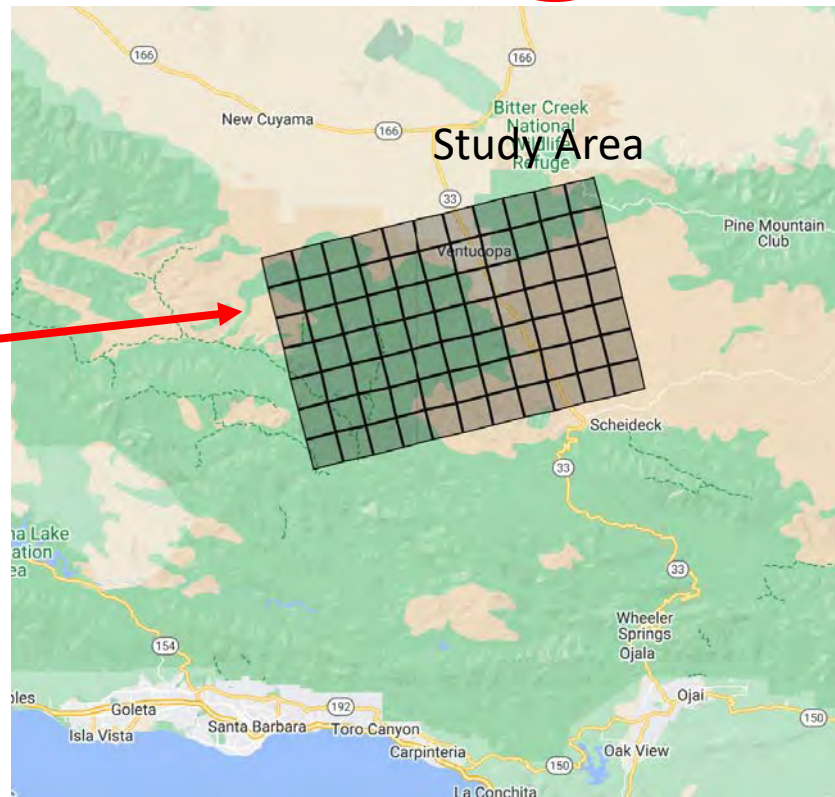
Santa Ynez Target Area:  
Santa Ynez Watershed  
and Lake Cachuma

# Task 1 – Analyze a 5-year numerical weather model cloud and weather simulations to determine the seeding potential across the Cuyama Headwaters

Variety of conditions

Water Year	Precipitation (Figueroa Mtn)	ENSO Phase
2019-2020	21.57"	Neutral
2020-2021	8.41"	La Nina
2021-2022	13.76"	La Nina
2022-2023	42.94"	La Nina
2023-2024	26.79"	El Nino

Model grid cells used in analysis



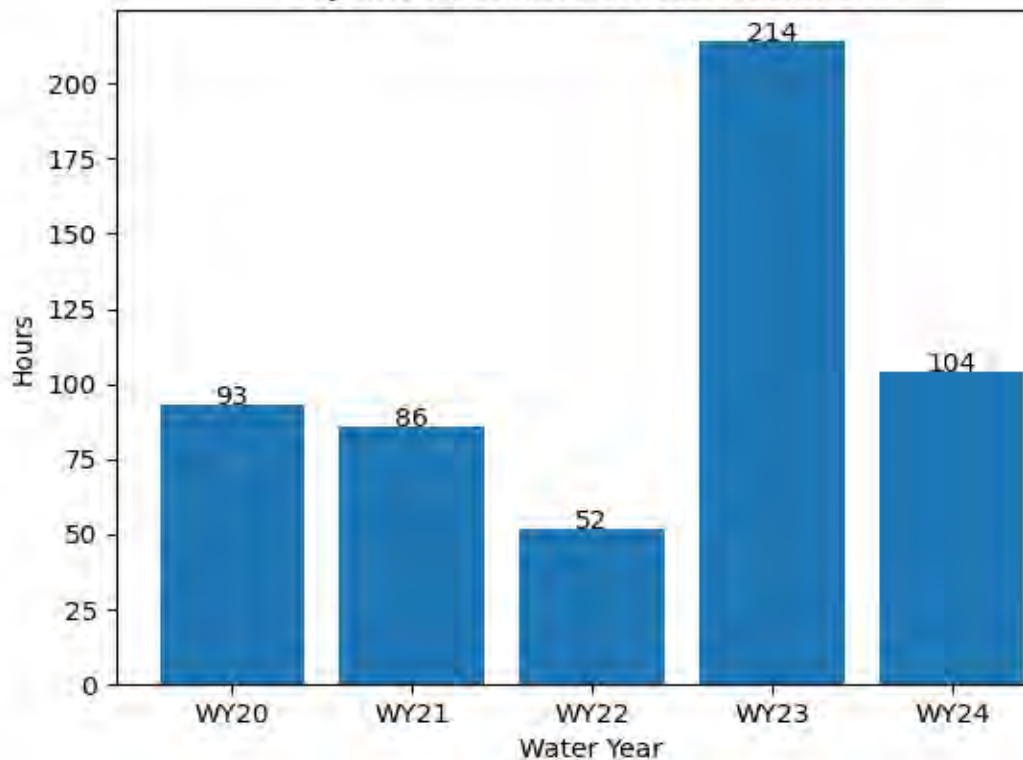
# Define Seedable Conditions in the Model

	<b>Ground-based</b>	<b>Aircraft-based</b>
<b>Altitude band:</b>	4,000 – 11,000 ft	8,000 – 14,000 ft
<b>Temperature:</b>	Between -18 and -5 °C	
<b>Cloud Liquid Water (CWMR)</b>	> 0.135 g kg <sup>-1</sup>	
<b>Minimum number of Model grid cells satisfying Temperature and CWMR conditions, per hour</b>	5	
<b>Median Altitude of reported Wind Values</b>	10,000 ft	14,000 ft

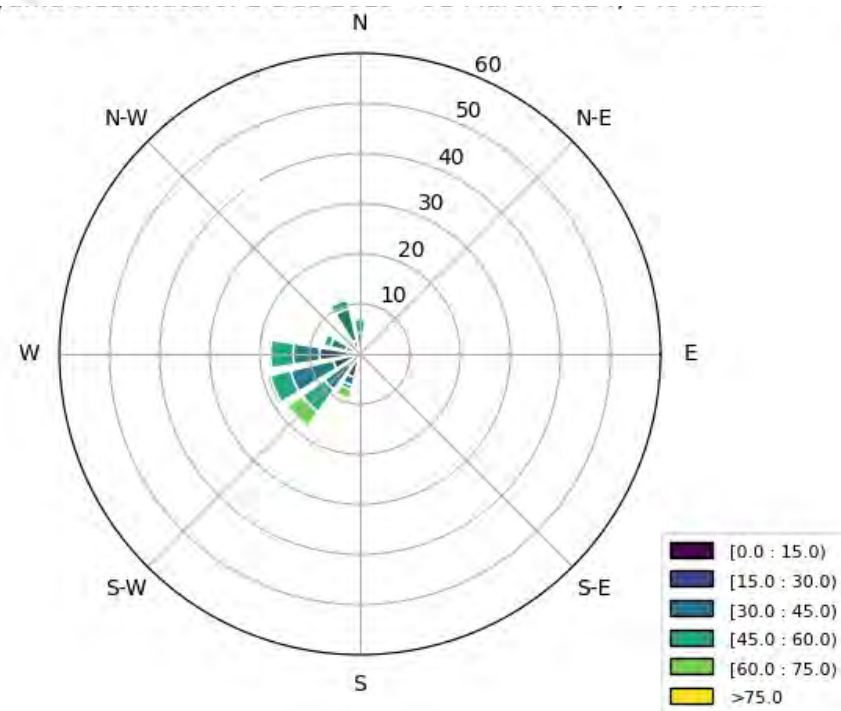


# Results: Ground-based Seedable Conditions <sup>59</sup>

Seedable Hours by Water Year  
Cuyama Headwaters, Total Hours: 549

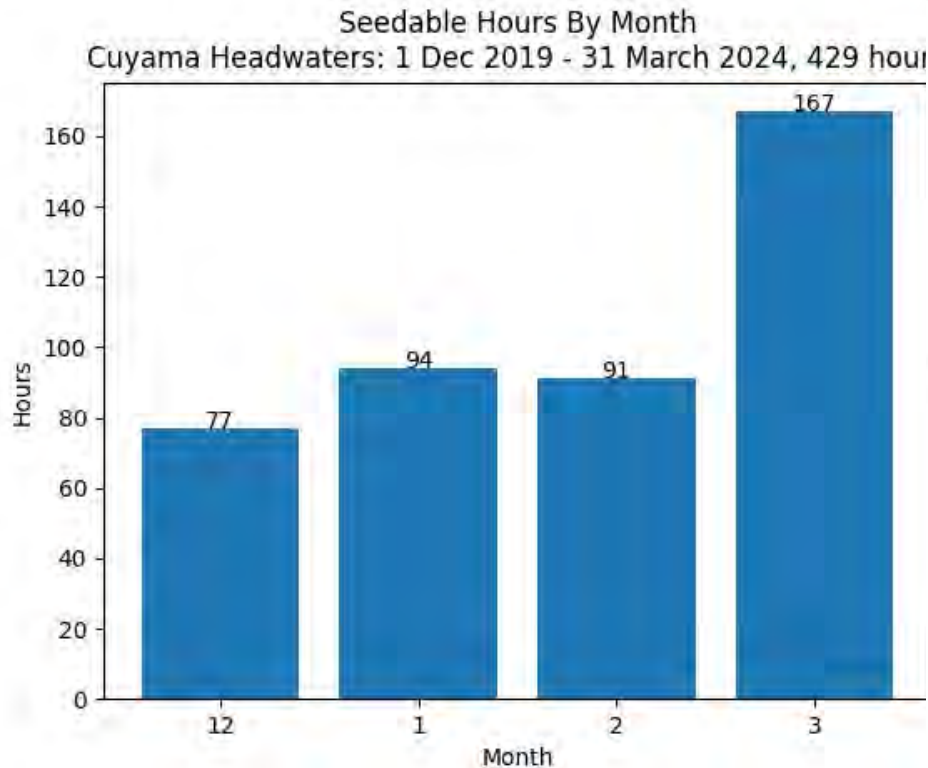


549 hours seeding conditions  
over the 5-year study

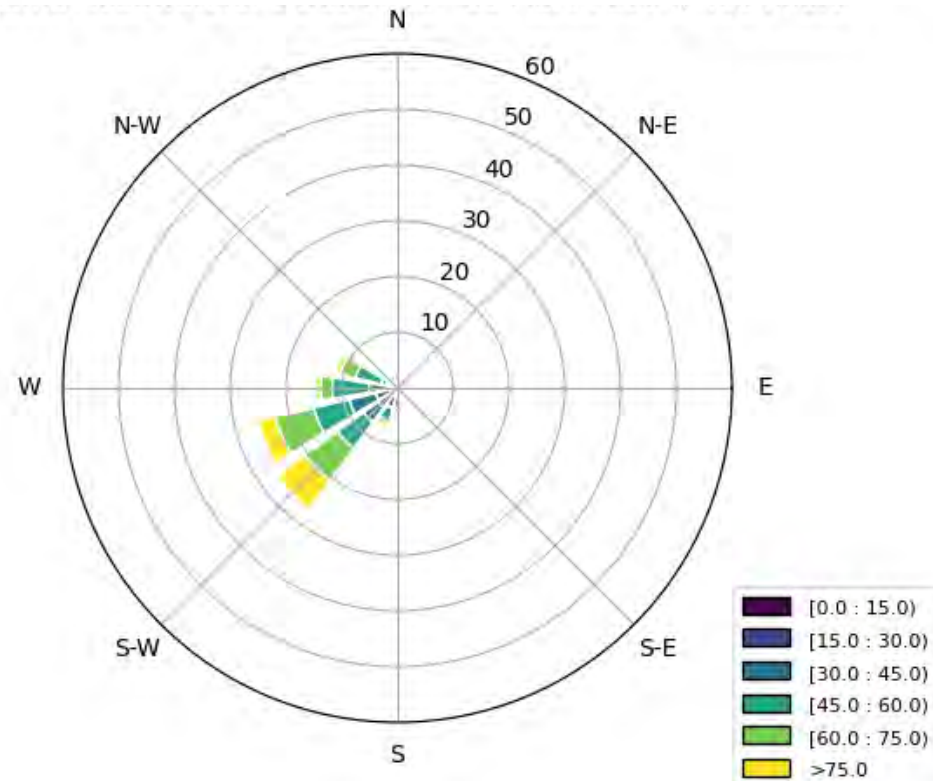


10,000' MSL wind direction and speed  
for the seeding hours over the 5-year  
study. Southwest through west  
dominates at 30 to 75 MPH.

# Results: Aircraft-based Seedable Conditions <sup>60</sup>



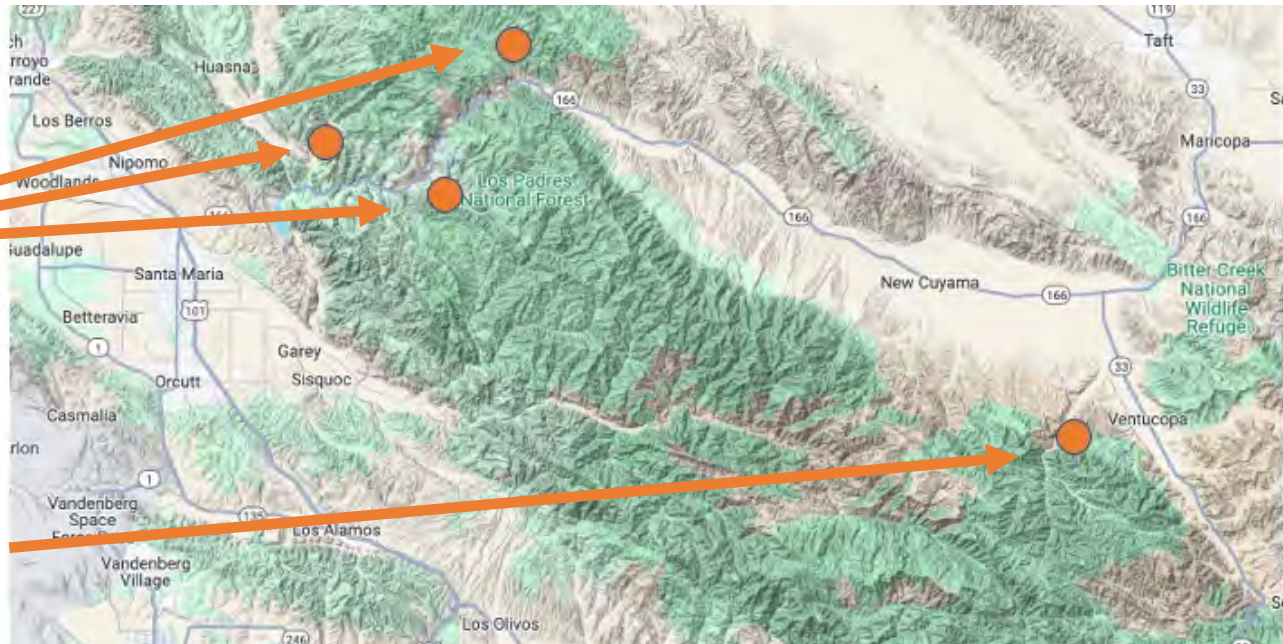
429 hours seeding conditions over the 5-year study. March had the most seeding conditions.



12,000' MSL wind direction and speed for the seeding hours over the 5-year study. Southwest through west dominates at 30 to 75 MPH.



# Task 2) Is the Santa Barbara Seeding Project reaching the Cuyama Headwater (rain chemistry)? No!



Collection Locations

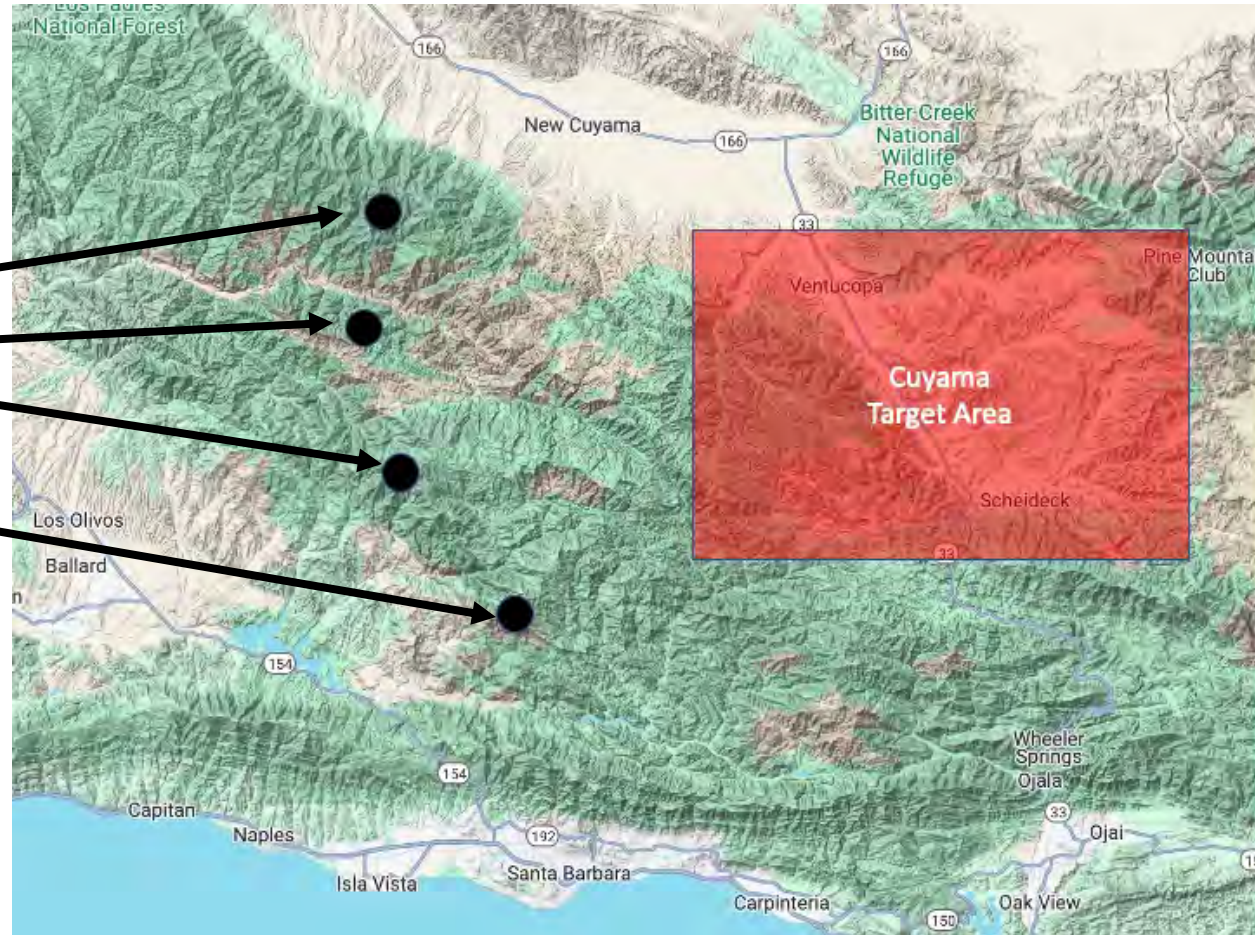
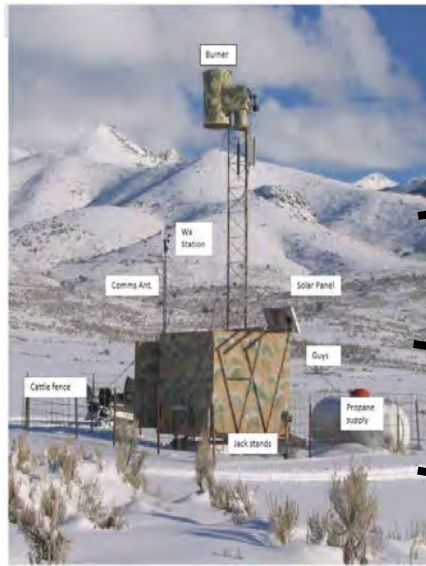
Santa Barbara Canyon

Seeding material absent in Cuyama Headwaters

	Collection Location			
Storm Date	Santa Barbara Canyon	Alamo	Willow Springs	Cable Corral
Jan 30 – Feb 1, 2024	< 1 ppt	7.1 ppt	6.6 ppt	3.7 ppt



# Hypothetical Ground Program





# Ground Program:

## If half of seedable hours were seeded

$(\text{seeding hours}) * (4 \text{ generators}) * (20 \frac{\text{af}}{\text{hour}}) = \text{af of additional water resources}$

Water Year	Seeding Hours (hrs)	Number of Generators	Precipitation Increases (acre-feet)
2020	46	4	3,680
2021	43	4	3,440
2022	26	4	2,080
2023	107	4	8,560
2024	52	4	4,160
<b>Total</b>	<b>274</b>	<b>4</b>	<b>21,920</b>

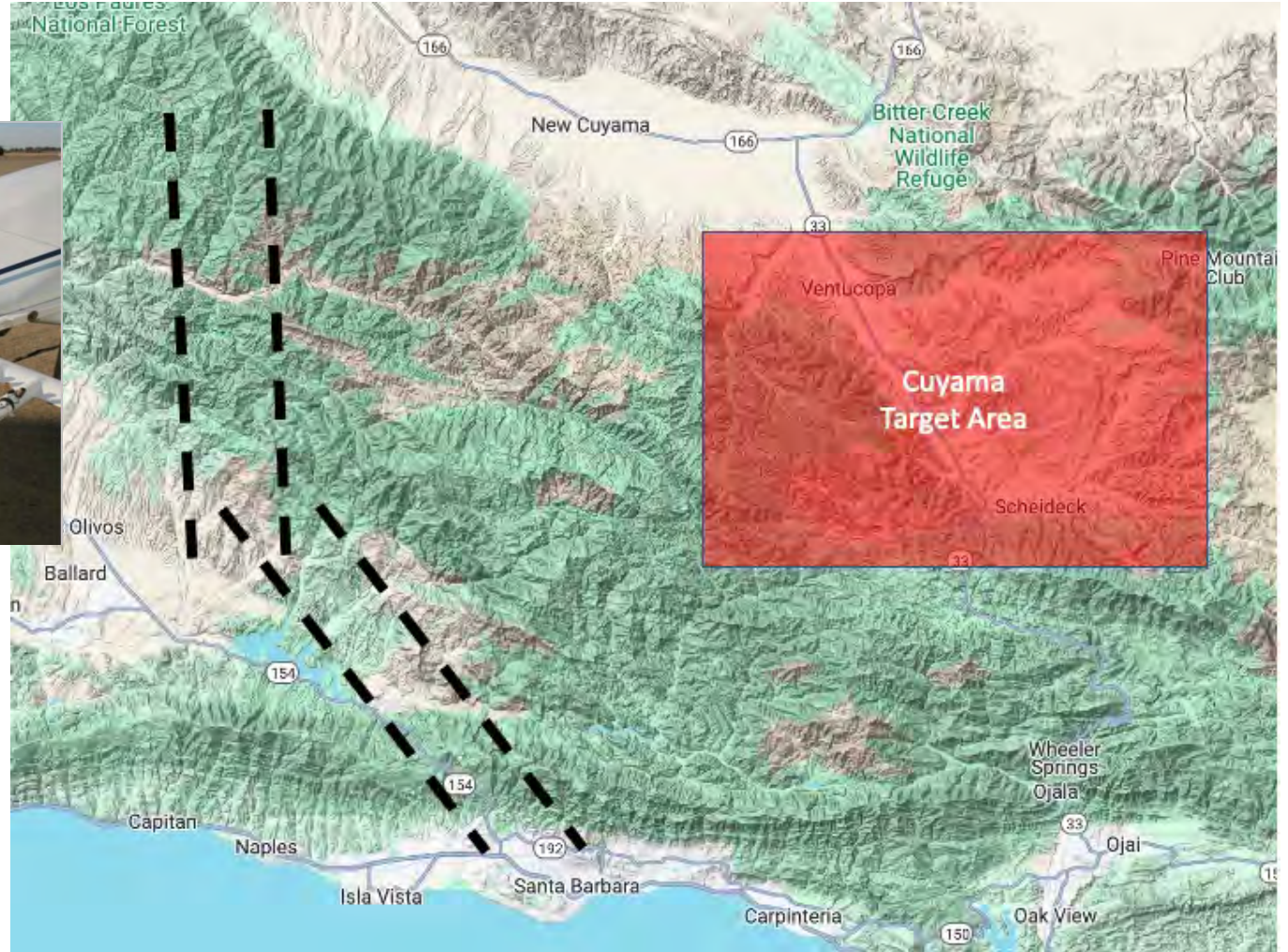
# Costs for ground program

- Up front cost – to get started
  - Fabricate new generators if necessary (~\$60K per generator)
  - Find locations for generators
  - Required EA/CEQA?
  - Install equipment
- Annual Costs after 1<sup>st</sup> year
  - \$100K/per year
- Cost Benefits
  - 5 year average increase  $(21,920/5) = 4384$  acre-feet
  - $\$100K/4384$  acre-feet = \$22.81 per acre-feet





# Aircraft Program



# Aircraft Program

if 25% of seedable hours were seeded

$$(\text{seeding flight hours}) * \left(200 \frac{\text{af}}{\text{hour}}\right) = \text{af of additional water resources}$$

Water Year	Flight seeding hours (hours)	Precipitation Increases (acre-feet)
<b>2020</b>	20	4,000
<b>2021</b>	12	2,400
<b>2022</b>	11	2,200
<b>2023</b>	38	7,600
<b>2024</b>	28	5,600
<b>Total</b>	109	21,800

# Costs for an aircraft program

- Up front cost – ? (low if no EA required)
  - Contracting with vendor
  - Required EA/CEQA? (not sure this is necessary as Santa Barbara County is already doing cloud seeding in the Cuyama Watershed.
  - Need to do public notice in media and have public meeting (part of vendor duties)
- Hourly costs after 1<sup>st</sup> year
  - \$10K/per hour total
  - Up to 500 acre-feet per hour possible, \$20 per acre-foot
  - Example) 20 flight hours would be a \$200,000 project and produce 4,000 acre-ft but potentially as much as 10,000 acre-ft (weather dependent).

<b>NEW CUYAMA</b>	
Population	562
Ft. above sea level	2150
Established	1951
<b>TOTAL</b>	<b>4663</b>



# Thank You/Questions







**Assessing the Cloud Seeding Effects from the Santa Barbara County  
Cloud Seeding Program on the Cuyama Valley**

Frank McDonough  
Desert Research Institute (DRI)

January 2025

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# 1 Introduction

In the western US, precipitation from winter storms is critical for many facets of life across the region, including, but not limited to, the economy, ecology and forestry, and water supplies. In addition to ice crystals and snowflakes, the subfreezing portions of winter storm clouds crossing eastern Santa Barbara County frequently have subfreezing liquid water drops (SLW) (Bernstein et. al 2007). These SLW drops will readily freeze onto any surface they come into contact with. Figure 1 shows a huge mountain top rime ice accretion following a Pacific storm. The rime accretion occurred due to the contact and freezing of SLW drops onto equipment. If SLW drops contact ice crystals in clouds then they will freeze on the crystals, causing them to grow large enough to fall out as precipitation. However, the absence of a sufficient number of ice crystals within clouds results in much of the SLW in winter storms remaining within the clouds as small droplets. This results in the moisture crossing the mountains as unrealized precipitation.



*Figure 1: Rime ice showing the presence of supercooled liquid water in Pacific storms.*

Cloud seeding is a method to add minute ice forming dust particles into SLW clouds. These dust particles interact with the small SLW droplets in the clouds and cause some of them to freeze. The newly formed ice crystals will quickly grow to snowflake sizes utilizing the cloud SLW, and fall to the surface over the cloud seeding target area.

Cloud seeding is typically done from either ground-based generators or flares mounted on aircraft. The generators and flares release minute solid particles of silver iodide dust which quickly enter the clouds and provide ideal surfaces for new ice crystals to form. Once these ice crystals form, they typically grow to precipitation sized particles within 20-30 minutes. The closer the release point of the generators or flares to the seedable clouds, the more likely cloud seeding will be successful. In addition, it's necessary to locate ground-based generators or fly

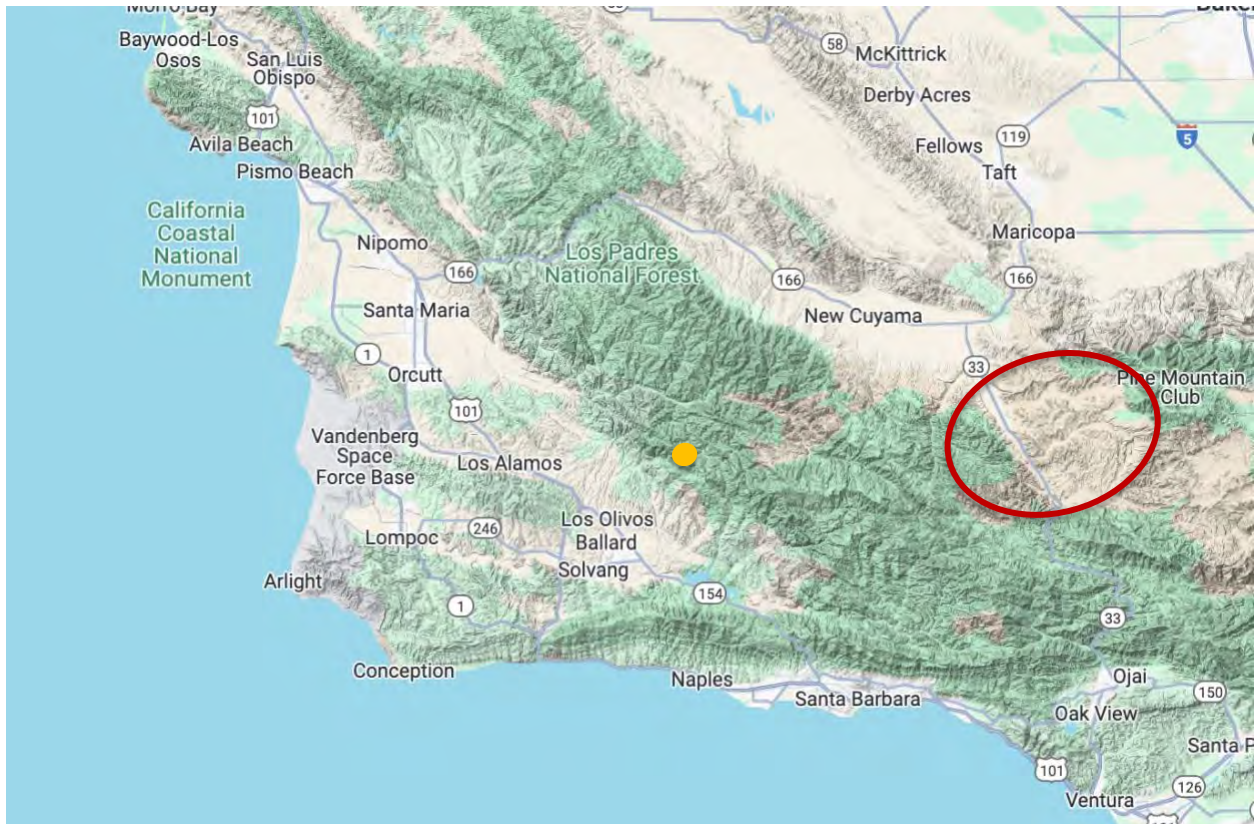
aircraft tracks about 15 miles upwind from the target area (dependent on what typical storm wind speeds occur). This is optimal to have the seeded precipitation fall within the target area.

Recent well-funded research studies have shown seasonal snowfall/precipitation enhancements of 14% (Manton and Warren, 2011), and recent case studies of storms over Idaho have shown snow water equivalent (SWE) precipitation increases of 0.4mm (0.016”) to 1.3mm (0.05”) per hour across a 930 sq. mile target area, with up to 275 acre-feet of SWE added to the snowpack in 24 minutes (Friedrich et. al 2020).

In this report, a set of 3 research tasks are presented. The first task focused on creating and analyzing multiyear full-winter output from high-resolution numerical weather prediction model output and creating cloud seeding climatologies over the Cuyama Headwaters. In task two the study assesses if the current Santa Barbara Cloud Seeding project is delivering cloud seeding material to the Cuyama target area by collecting precipitation samples from within the target area during seeding operations and analyzing the chemistry of the precipitation. This analysis looked for slightly elevated silver levels, which would confirm whether the generators are well placed and delivering seeding materials to the target area. The final task was to develop a hypothetical cloud seeding program and estimate how much additional precipitation could be added to the Headwaters region.

## **2 Geography & Santa Barbara Cloud Seeding Project Overview**

The headwaters of the Cuyama River reside in eastern Santa Barbara County and northwestern Ventura County, southeast of New Cuyama (Figure 2). The headwaters are part of the southern California Traverse Ranges, with the highest peaks in the Cuyama headwaters area extending to over 8,000’ MSL. The Cuyama River flows generally from east to west through New Cuyama and eventually drains into the Pacific along the west coast of Santa Barbara County.



*Figure 2: The greater Santa Barbara County terrain map. The red oval shows the location of the Cuyama River Headwaters and the orange dot shows the location of the Figueroa Mountain Rain gauge.*

The greater Santa Maria River watershed is shown in Figure 3. The watershed includes the Cuyama River and the Sisquoc River. The existing Santa Barbara Twitchell Reservoir Cloud Seeding project is designed to add water resources to the Twitchell Reservoir. The main rivers and creeks that supply the reservoir include the Cuyama River, Alamo Creek, and the Huasna River.





Figure 3: The Cuyama and Sisquoc River drainages.

The Santa Ynez River watershed is shown in Figure 4. The upper portion of the watershed spans from the eastern edge of Santa Barbara County to Cachuma Lake Reservoir. The water sources feeding Cachuma Lake include the main stem of the Santa Ynez River as well as several creeks that flow south off the higher terrain to the north of the river. These areas make up the Santa Barbara County Santa Ynez (Cachuma) Cloud Seeding project area.





*Figure 4: The Santa Ynez River watershed.*

The Santa Barbara County Cloud Seeding Program target areas and generator sites are presented in Figure 5. The generator sites are designed to operate under south through westerly wind directions. The Santa Barbara Cloud Seeding Project operates ground-based generators consisting of cloud seeding flares that burn in 4-minute intervals and release short bursts of seeding material. This is in opposition of solution burning ground-based generators, commonly used on other projects, that burn continuously and release seeding material during an entire storm. The project targets the burn of the cloud seeding flares to occur during the short-lived convective bands.

The Twitchell generators are between 100-km (62 miles) and 120-km (75-miles) from the Cuyama headwaters, and the Cachuma generators are between 40-km (25-miles) to 65-km (40-miles) from the Cuyama headwaters. The headwaters of the Cuyama River are not part of the project.



Figure 5: Santa Barbara County Cloud Seeding Project Target Areas (Green Shading) and the 7 Ground Generator Sites (black stars).

## 3 Analysis

### 3.1 Task 1: High-Resolution Model Climatology

#### 3.1.1 Task 1 Goals

Understanding the physics of the clouds crossing the Cuyama Headwaters cloud seeding target area is critical for determining the potential for cloud seeding. Clouds must contain SLW at temperatures colder than  $-5^{\circ}\text{C}$  to be seedable. Since there are no direct observations of the cloud microstructure (particles within clouds), the main goals for task 1 are to use high resolution numerical weather prediction modeling to identify the time periods, altitudes, winds, and temperatures when cloud seeding conditions are present across the Cuyama Headwaters cloud seeding target area.

### 3.1.2 Task 1 Methodology

#### 3.1.2.1 Study Time Frame

The study time period consisted of the past 5 years of winter season months (December 1 – March 31) from 1 December 2019 – 31 March 2024. There was a variety of winter seasonal precipitation amounts (as observed at the Figueroa Mountain rain gauge in the mountains of central Santa Barbara County [see Figure 2 for location]). Drought years and very wet years were represented in the study, as well as all three ENSO phases (El Nino, La Nina, and Neutral) (Table 1). In addition, using the past 5 winters for the assessment better represents the current climate regime.

*Table 1: Years modeled, precipitation recorded over the Santa Barbara County Mountains at the Figueroa Mountain rain gauge, and the ENSO Phase.*

Water Year	Precipitation (Figueroa Mtn)	ENSO Phase
<b>2019-2020</b>	21.57"	Neutral
<b>2020-2021</b>	8.41"	La Nina
<b>2021-2022</b>	13.76"	La Nina
<b>2022-2023</b>	42.94"	La Nina
<b>2023-2024</b>	26.79"	El Nino

#### 3.1.2.2 Numerical Weather Prediction Model Data

Hourly Numerical Weather Prediction (NWP) model data from the analysis runs of the 3-km High Resolution Rapid Refresh (HRRR) model (Dowell et. al., 2022) were used in the climatological analysis. The model uses new observations to initialize the grid each hour. The HRRR includes a state-of-the-art cloud physics scheme with 4 different classifications of cloud particles, including the most advanced depiction of subfreezing cloud liquid water. The cloud scheme also has an advanced (aerosol aware) parameterization as part of its cloud microphysical module and allows convection. Validation of the cloud scheme shows that supercooled liquid water is present in the model at over 75% of the locations where icing (SLW) is reported by aircraft (Thompson et. al, 2017).

A subset of the HRRR grid was identified over the Cuyama Headwaters target area. This three-dimensional high-resolution grid, with 3-km horizontal grid point spacing and 50 vertical levels, formed the basis for the study. Figure 6 shows the horizontal footprint of the target area grid overlaid on a map of the greater Santa Barbara/Ventura County region. The Cuyama Headwaters grid has an 11 x 7 grid footprint. The model fields used in the analysis are listed in Table 2.



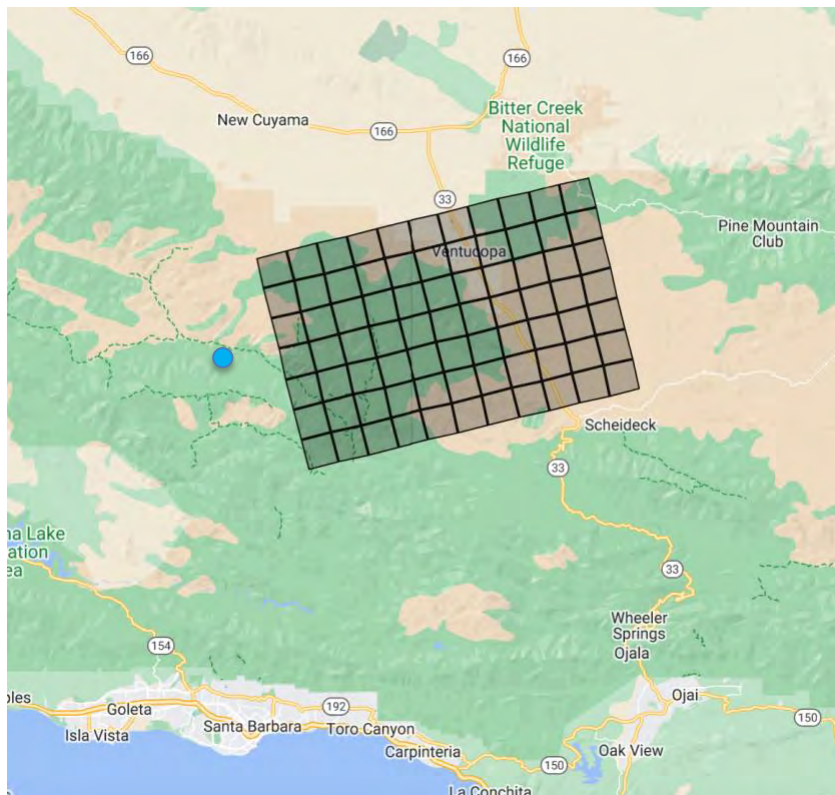


Figure 6: NWP Model Domain for the Cuyama Headwaters Target Area. Blue dot shows the location of the Figueroa Mountain precipitation gauge.

Table 2: Model fields used in the study

GRIB Name	Units
<b>Geopotential Height</b>	Gpm
<b>Cloud Water Mixing Ratio</b>	kg / kg
<b>Temperature</b>	K
<b>U component of wind</b>	m / s
<b>V component of wind</b>	m / s
<b>Pressure</b>	Pa
<b>Specific humidity</b>	kg / kg
<b>Snow Mixing Ratio</b>	kg / kg
<b>Graupel (Snow Pellets)</b>	kg / kg
<b>latitude</b>	Degrees north
<b>longitude</b>	Degrees east

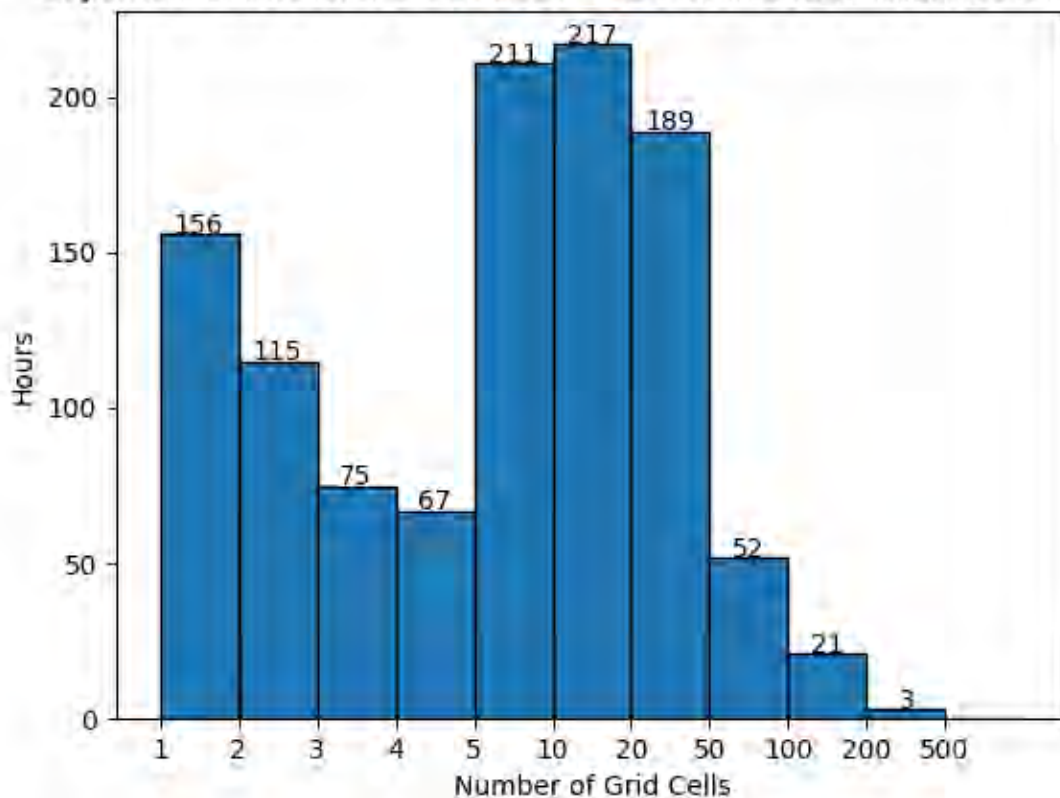
### 3.1.2.3 Definition of Seedable Conditions

Defining what constitutes favorable seedable conditions for each hourly model update relies on data at each grid cell within the specific target area grid at the appropriate altitudes. Two altitude bands are considered in this study, one relevant for ground-based seeding operations and a second one relevant to aircraft seeding.

The ground-based altitude band looked at all model grid cells between 4,000 and 11,000 feet MSL. This layer is potentially seedable from the ground when the lowest layer of the atmosphere is unstable, allowing uninhibited vertical mixing. The aircraft-based altitude band looked at all model grid cells between 8,000 and 14,000 feet MSL, as these are the altitudes for which an aircraft could seed the area. Next, each grid cell within the target area grid and corresponding altitude band was assessed to determine if the temperature was within the  $-18^{\circ}\text{C}$  to  $-5^{\circ}\text{C}$  range. The liquid water content of each cell was also assessed. While most studies have used the low threshold of  $0.001\text{ g kg}^{-1}$ , essentially looking at whether any liquid water was present at all, this study uses the threshold of  $0.135\text{ g kg}^{-1}$  since this is a more realistic minimum amount of cloud water needed to adequately grow precipitation sized snowflakes in the distance between the generators and the target area.

For each hourly model update, a minimum of 5 grid cells within the target area grid, distributed either vertically or horizontally, that satisfied the temperature and cloud water requirements, as outlined above, were needed to signify that seeding conditions were present for that hour. This value was determined by considering grid volume and the growth rate of ice in supercooled liquid water. Figure 7 shows the number of grid cells that satisfy the temperature and liquid water requirements for each model update over the five-year study period for the aircraft-based altitude band over the Cuyama target area. Model hours for which no cells satisfied the conditions, and thus have no seeding potential, are not shown. While requiring at least five grid cells to satisfy the temperature and liquid water requirements to determine seedable conditions does eliminate some seedable hours, as seen in Figure 7, most of the updates show 5-or-more grid cells satisfying the requirements. Note also there is a clear delineation between the number of cases with 4 vs 5 grid cells satisfying the conditions.

Number of Grid Cells with Seeding Conditions  
Cuyama Headwaters: 1 Dec 2019 - 31 March 2024, Total Hours: 1106



*Figure 7: Number of Grid Cells with Seeding Conditions for altitudes relevant to Aircraft-Based Cloud Seeding for the Cuyama target area for WY20-WY24.*

The wind speed and temperature during seeding conditions were reviewed as part of the climatology. For ground-based seeding, the median of the wind speed and direction of all the model grid cells closest to 10,000 ft within the target area is reported. For aircraft-based seeding, the median wind speed and direction from 14,000 ft is reported.

Table 3 contains a summary of the definition of seedable conditions for each model update described in this section.

*Table 3: Summary of Seedable Conditions Definition*

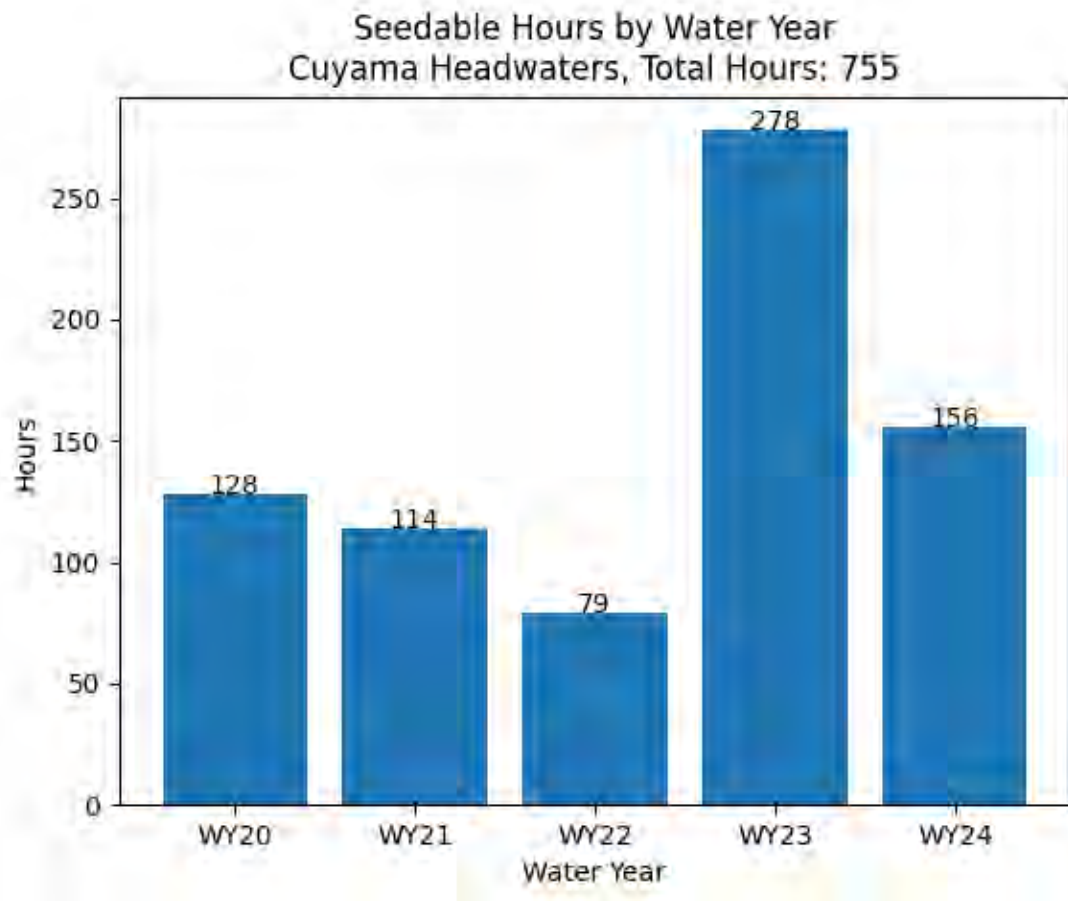
	Ground-based	Aircraft- based
<b>Altitude band:</b>	4,000 – 11,000 ft	8,000 – 14,000 ft
<b>Temperature:</b>	Between -18 and -5 °C	
<b>Cloud Liquid Water (CWMR)</b>	> 0.135 g kg <sup>-1</sup>	
<b>Minimum number of Model grid cells satisfying Temperature and CWMR conditions, per hour</b>	5	
<b>Median Altitude of reported Wind Values</b>	10,000 ft	14,000 ft

### 3.1.3 Climatology Results

#### 3.1.3.1 Cuyama Headwaters Area

##### 3.1.3.1.1 Ground based climatology

The analysis of the hourly ground-based climatology for the Cuyama Headwaters shows that there were 755 hours with seedable conditions across the five-year study period, as shown in Figure 8. As expected, the wettest year, winter 2022-2023 (WY23), had the most seedable hours with 278. Of interest was the driest year, WY21, which had 114 seedable hours, which was similar to the seedable hours present during the wetter year of WY20, and had more seedable hours than the higher precipitation winter of WY22. This suggests that significant cloud seeding opportunities can be present even during very dry years.

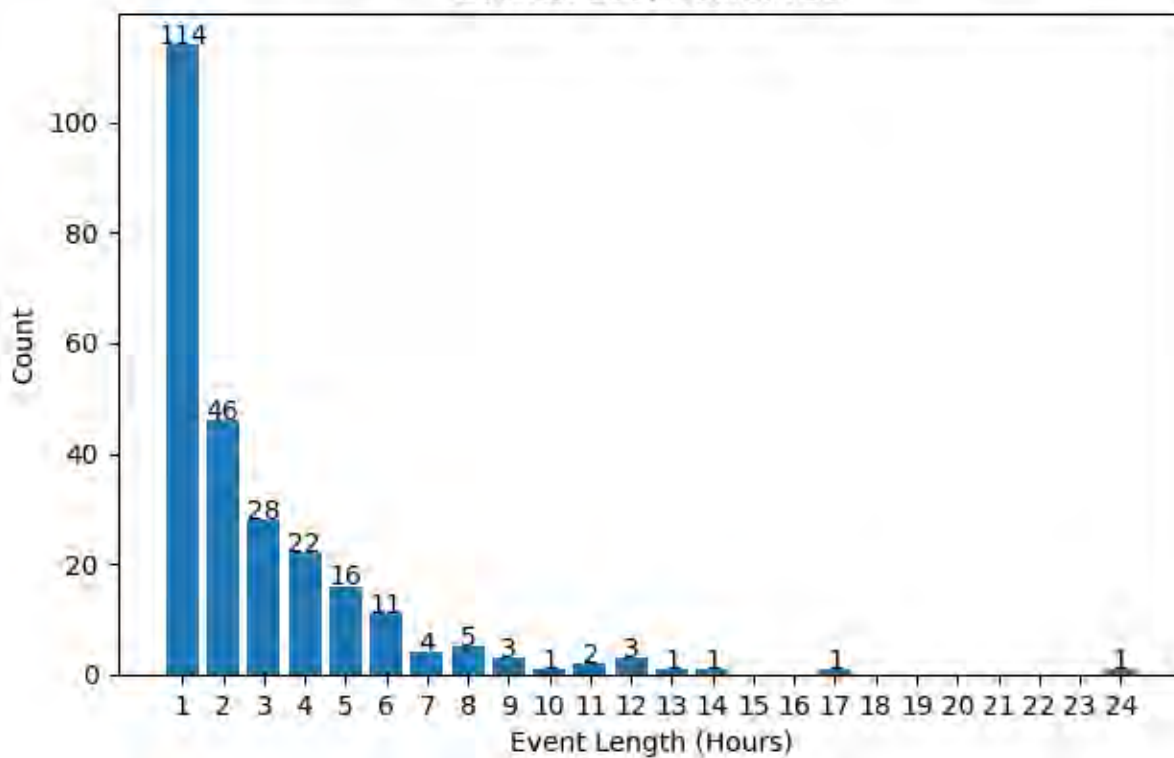


*Figure 8: Seedable Hours by Water Year for ground-based seeding over the 5-year Study Period WY20-WY24 for the Cuyama Area.*

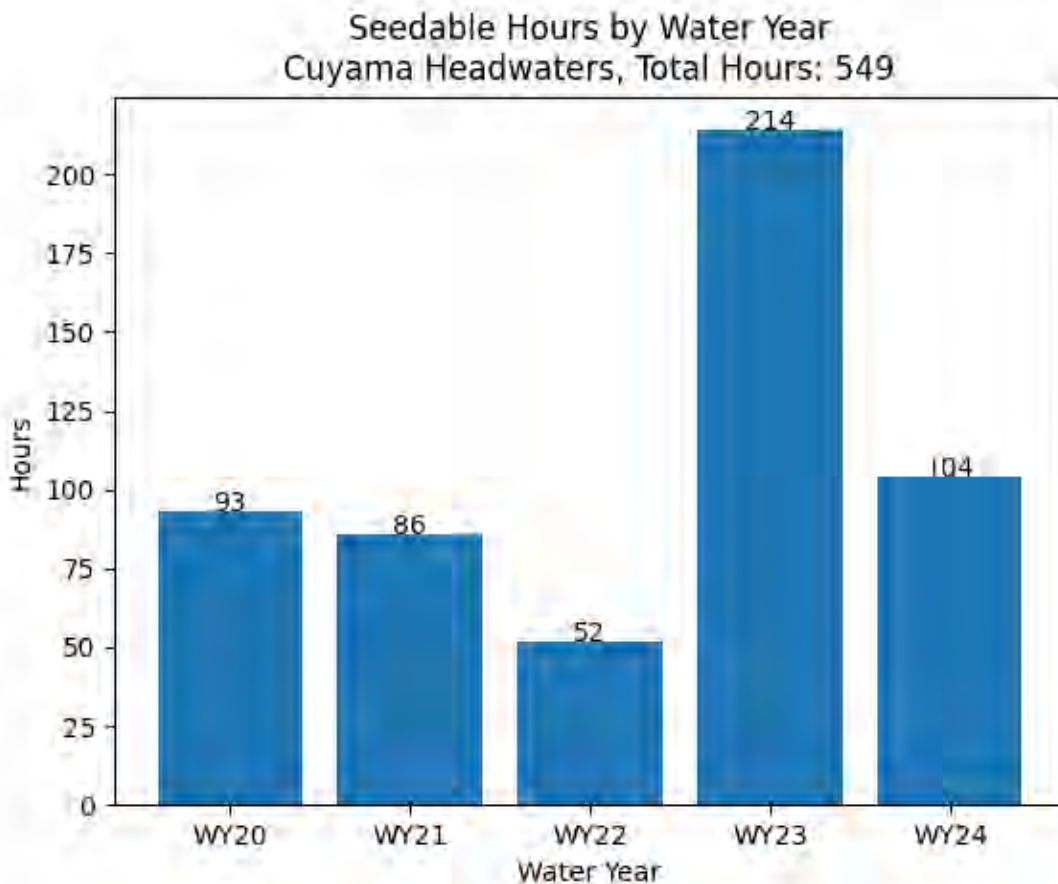
Next, the duration of the cloud seeding periods were determined. Figure 9 shows the duration of periods with consecutive hours with cloud seeding conditions, denoted as an event. The majority of events are short and fleeting, with 72% of the 259 events shorter than 3 hours, and nearly all of them shorter than 12 hours. However, the events lasting less than 3 hours only make up 27% (206 of 755) of the total seedable hours for the Cuyama Headwaters region. Due to the fleeting amounts of liquid water in the short duration seeding periods and the limited time to create and grow newly formed ice crystals to precipitation sized snowflakes, only events 3 hours long or greater were considered seedable for operational cloud seeding purposes for this study. The operational seedable hours by water year using the 3-or-more hour threshold is shown in Figure 10 and shows a total of 549 hours over the 5-year study period.



Duration of Cloud Seeding Events  
 Cuyama Headwaters: 1 Dec 2019 - 31 March 2024  
 Events: 259, Hours: 755

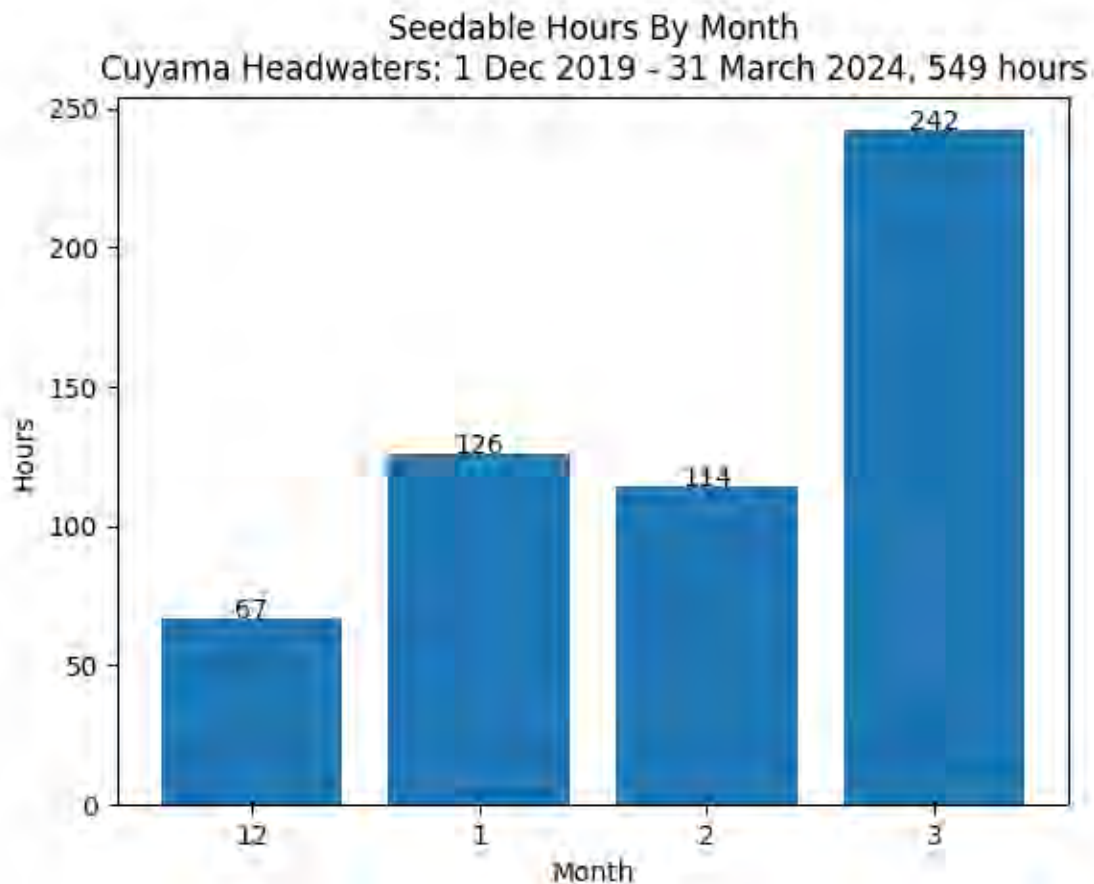


*Figure 9: Duration of Cloud Seeding Events for ground-based seeding over the 5-year Study Period WY20-WY24 for the Cuyama Target Area.*



*Figure 10: Seedable Hours by Water Year for ground-based seeding over the 5-year Study Period WY20-WY24 for the Cuyama Area for Events lasting at least 3 consecutive hours.*

Figure 11 shows the filtered seedable hours by month for the 5-year study period. The most seedable hours for the 5-year study period occur in the month of March, with 242 hours, which is about double the number of hours when compared to the largest number of seedable hours from the other months. This was due to the fact that the coldest storms of the season typically arrive in March. The coldest storms have a lower height of the seedable portions of the clouds which increases the chances for successful vertical mixing from ground-based seeding.



*Figure 11: Seedable Hours by Month for ground-based seeding over the 5-year Study Period WY20-WY24 for the Cuyama Target Area for events lasting at least 3 consecutive hours.*

The most common seeding level winds (10,000 ft MSL) during ground-based seeding conditions were from the southwest through west (Figure 12). During most California winter storms (mid latitude cyclones) these wind directions are associated with the approach and passage of the cold fronts. The wind directions are also clearly shown to be on-shore, bringing moisture off the Pacific. The wind speeds associated with seeding periods were relatively strong, typically greater than 30MPH.

Cuyama Headwaters: 1 Dec 2019 - 31 March 2024, 549 hours

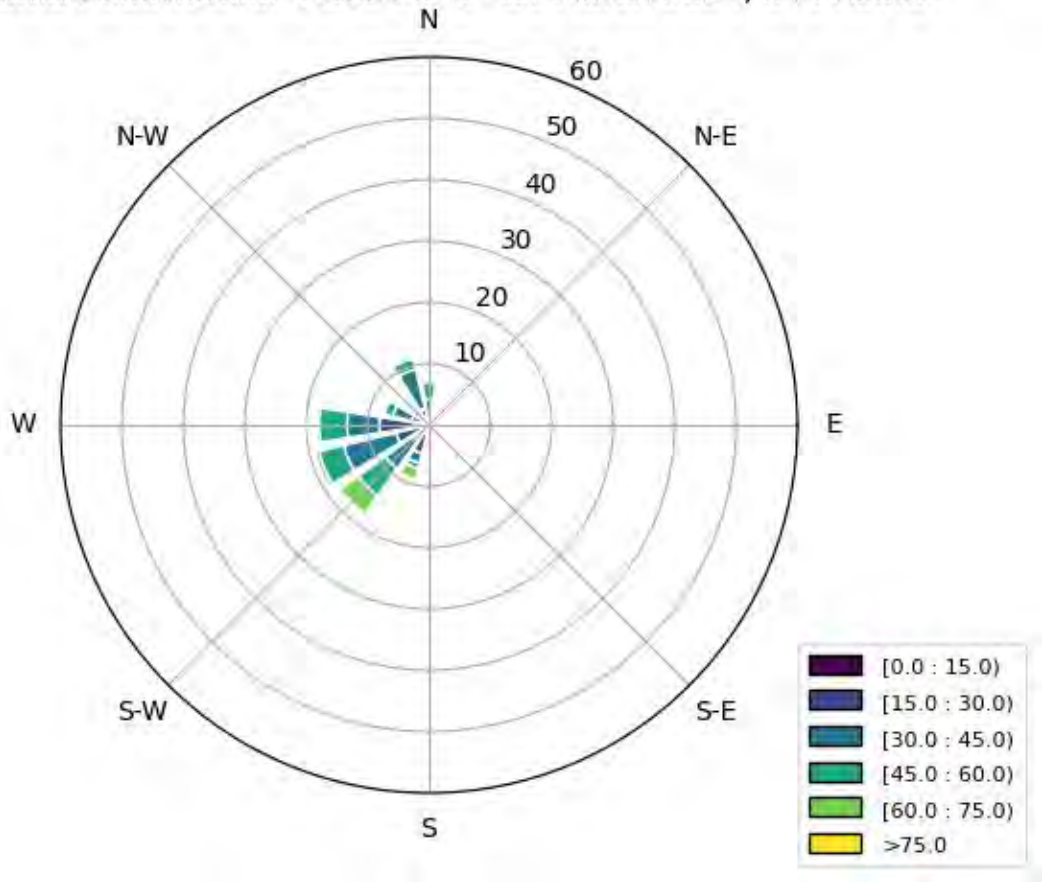
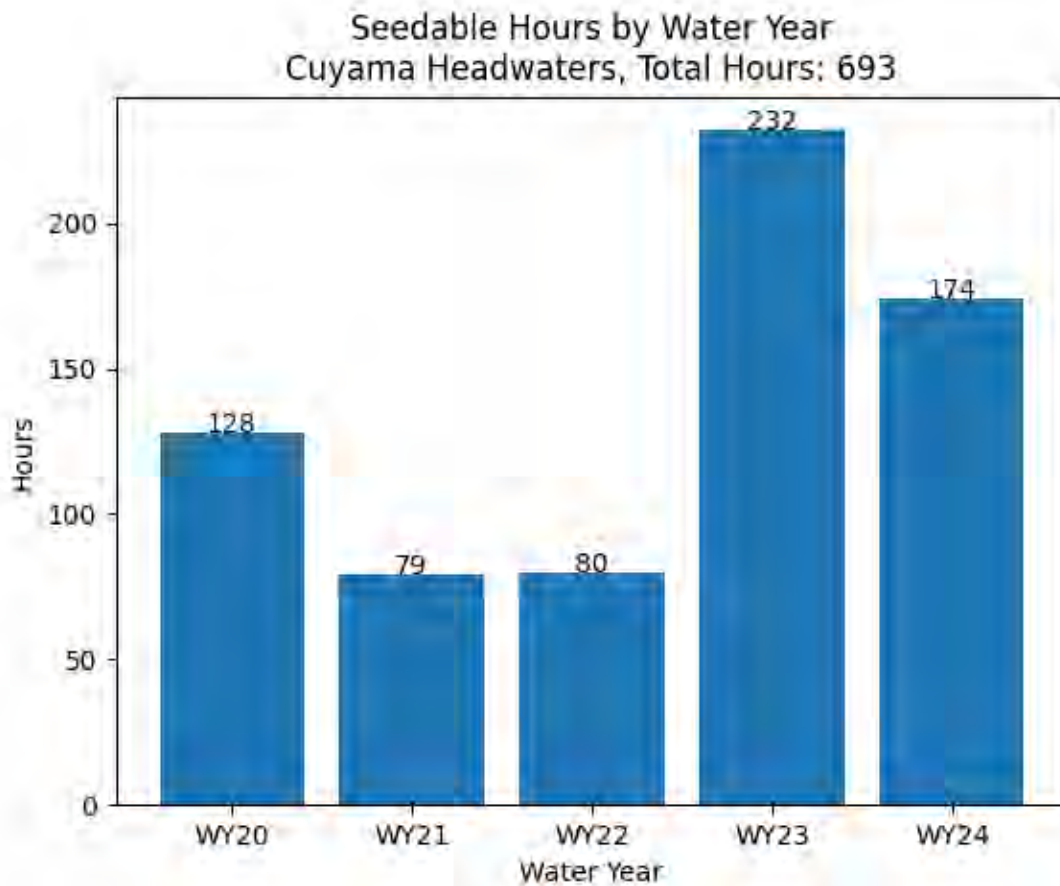


Figure 12: Wind Rose showing the 10,000 ft Wind Speed (MPH) and Direction when Seedable Conditions are Present for ground-based seeding over the 5-year Study Period WY20-WY24 for the Cuyama Target Area for Events lasting at least 3 consecutive hours.

3.1.3.1.2 Aircraft based climatology

The results of the hourly aircraft-based climatology for the Cuyama Headwaters Project show that there were 693 hours with seedable conditions across the five-year study period (Figure 13). This is 63 less hours than was identified for the ground-based seeding. Similar to the ground-based climatology, the wettest year winter 2022-2023 (WY23) had the most seedable hours with 232. Unlike the ground-based results, the frequency of seedable hours was more closely tied to the yearly precipitation.



*Figure 13: Seedable Hours by Water year for aircraft-based seeding over the 5-year Study Period WY20-WY24 for the Cuyama Headwaters Area.*

Next the duration of events, or periods with consecutive hours exhibiting cloud seeding conditions, for Cuyama Headwaters aircraft-based seeding were determined (Figure 14). As with the ground-based seeding, the majority of aircraft seeding events are short and fleeting, with 68% of the 259 events shorter than 3-hours, and nearly all of them shorter than 12-hours. However, the events less than 3 hours only make up about a third (229 of 652 or 35%) of the total seedable hours for the region. Similar to ground-based seeding, due to the fleeting amounts of liquid water in the short duration seeding periods and the limited time to create and grow newly formed ice crystals to precipitation sized snowflakes, only events 3 hour long or greater were considered seedable for operational cloud seeding purposes for this study. The filtered aircraft seedable hours using the 3-or-more hour threshold is shown in Figure 15. A total of 429 hours of aircraft seeding, within 3-or-more consecutive hour storm periods, were identified.

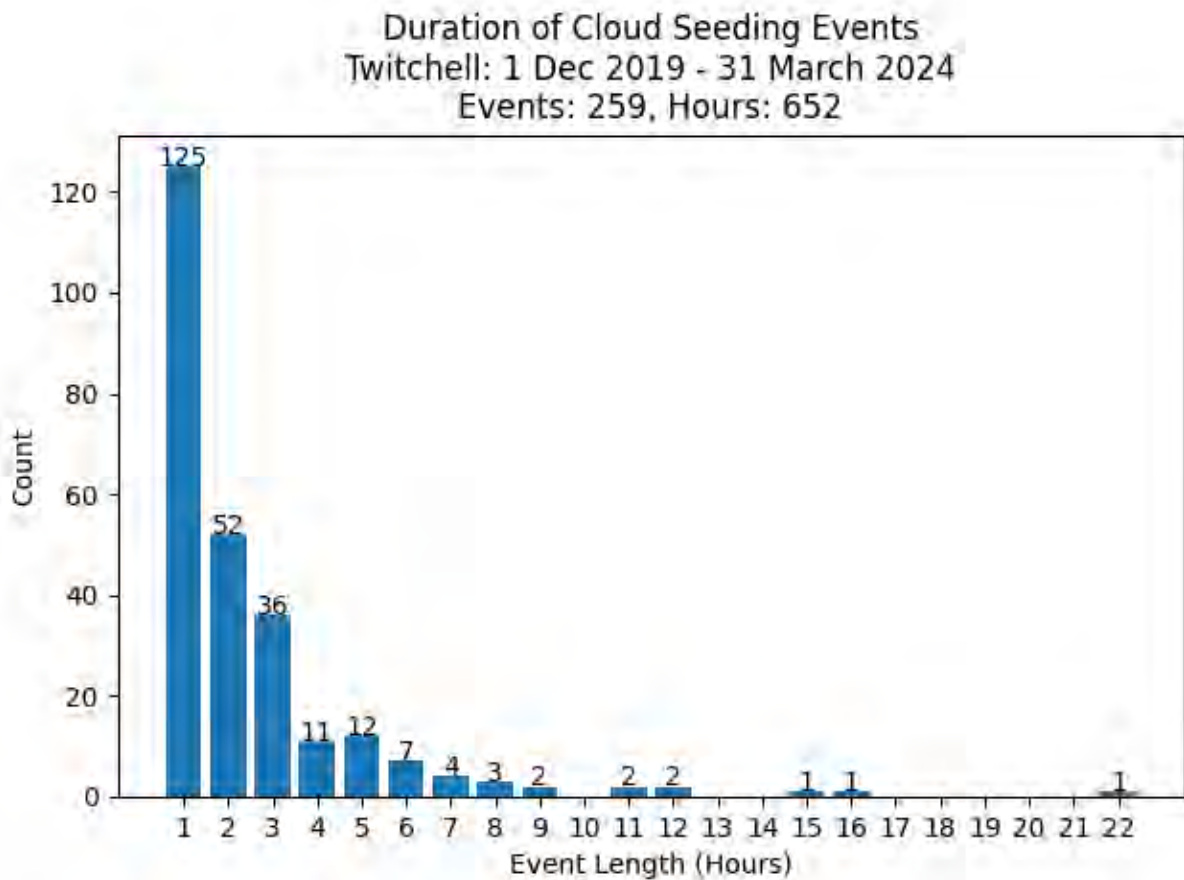
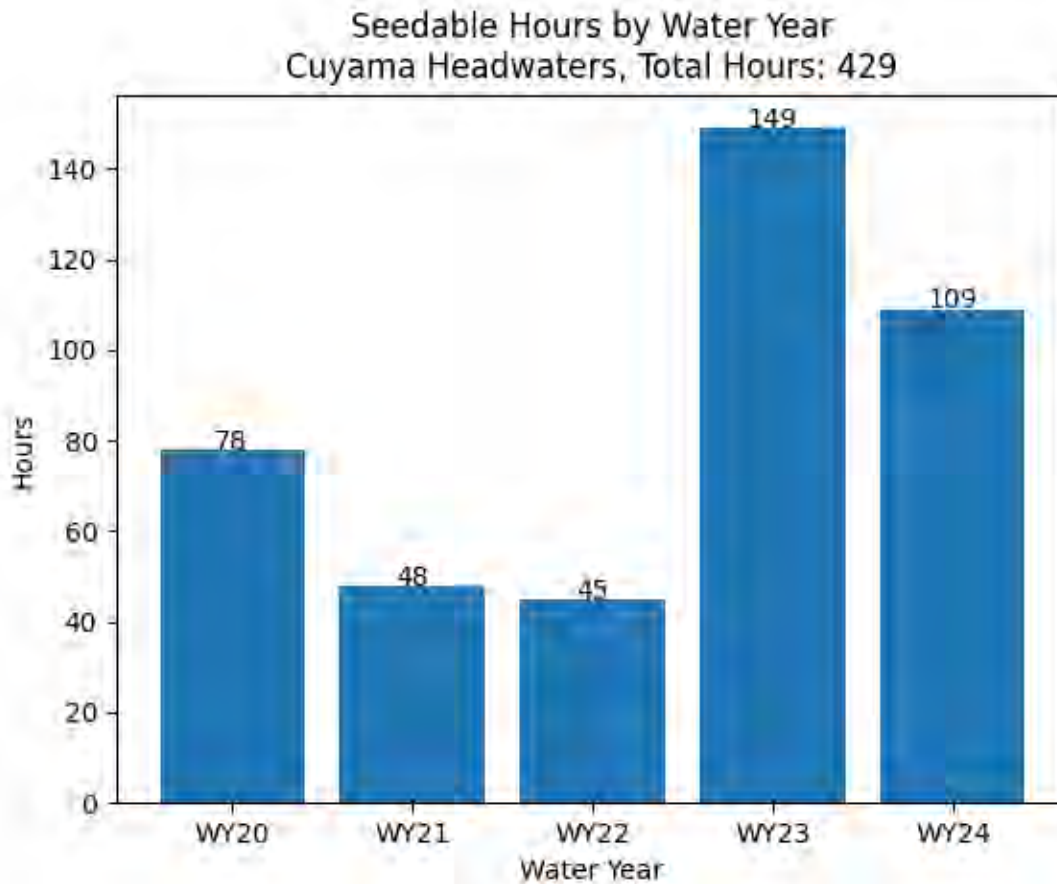


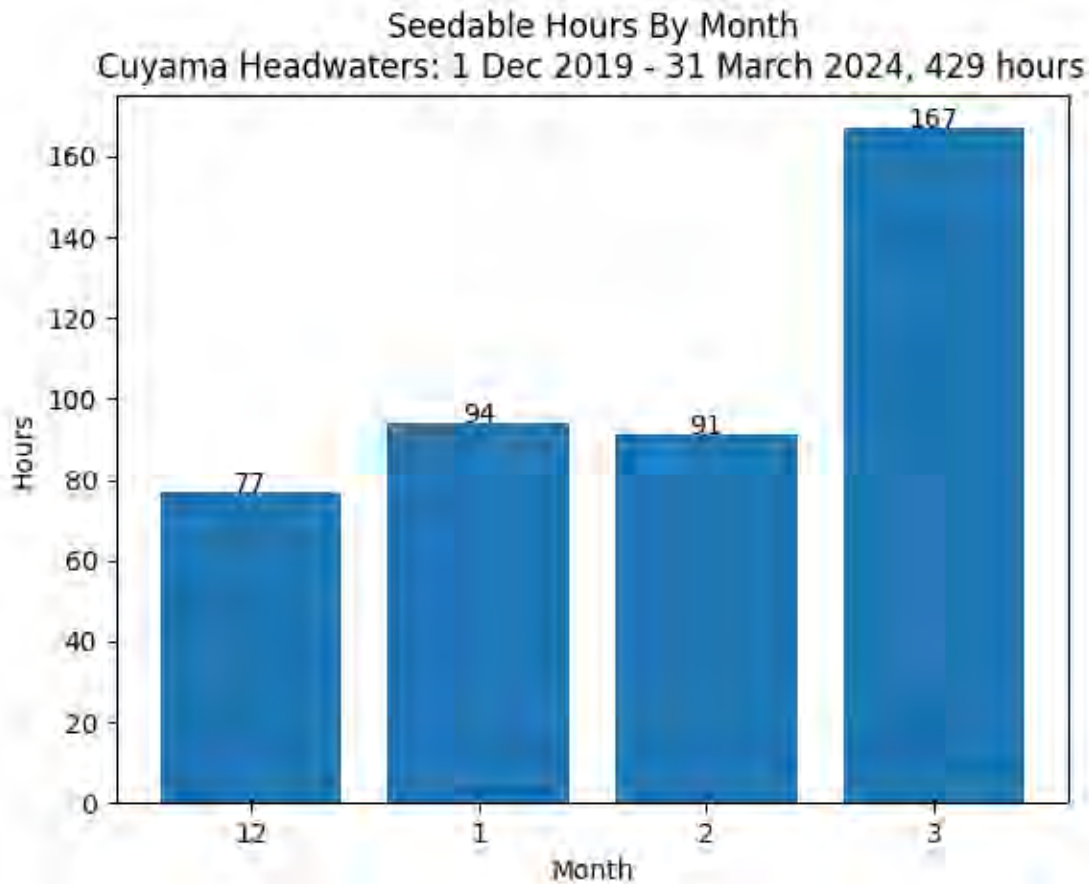
Figure 14: Duration of Cloud Seeding Events for aircraft-based seeding over the 5-year Study Period WY20-WY24 for the Cuyama Target Area.



*Figure 15: Seedable Hours by Water year for aircraft-based seeding over the 5-year Study Period WY20-WY24 for the Cuyama Target Area for events lasting at least 3 consecutive hours.*

Figure 16 shows the filtered seedable hours by month for the 5-year study period. March had the most opportunities for cloud seeding with 167 hours (Figure 16). Unlike the ground-based results where the hours in March were about double that of the other months, significantly more opportunities relative to March were found in December and January, which had 77 and 94 hours, respectively. This is due to the fact that storm temperatures are nearly always cold enough for aircraft seeding at 14,000' MSL.





*Figure 16: Seedable Hours by Month for aircraft-based seeding over the 5-year Study Period WY20-WY24 for the Cuyama Target Area for events lasting at least 3 consecutive hours.*

The most common seeding level winds (14,000' MSL) during the Cuyama aircraft-based seeding conditions were from the southwest through west-southwest (Figure 17), similar to the ground-based results. During most California winter storms (mid latitude cyclones) these wind directions are associated with the approach and passage of the cold fronts. The winds directions are also clearly shown to be on-shore, bringing moisture off the Pacific. The wind speeds associated with the aircraft seeding periods were stronger than seen for the ground-based results, typically greater than 45 MPH, with some median speed values larger than 75 MPH.

Cuyama Headwaters: 1 Dec 2019 - 31 March 2024, 429 hours

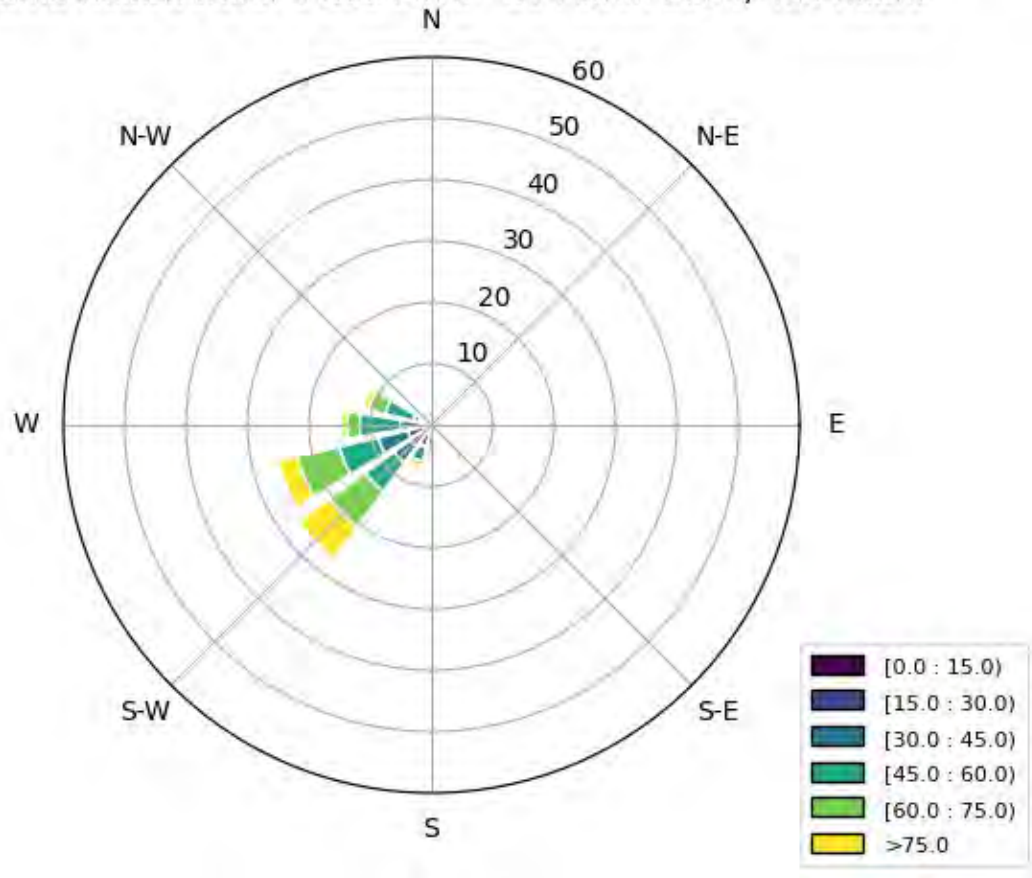


Figure 17: Wind rose showing the 14,000 ft wind speed and direction when seedable conditions are present for aircraft seeding over the 5-year Study Period WY20-WY24 for the Cuyama Target Area for Events lasting at least 3 consecutive hours.

### 3.1.4 Climatology Summary

The 5-year climatology using the high-resolution NWP model was completed for both potential ground- and aircraft-based cloud seeding over the Cuyama Headwaters. The results showed that cloud seeding opportunities were present during both dry and wet years. All of the periods that were considered seedable from the ground required 3-or-more consecutive hours of seeding conditions. Using the 3-or-more consecutive hours to define seeding activities allows sufficient time for ground-based generators to be started and aircraft to be deployed and conduct seeding.

The climatology results show there were a significant number of seeding opportunities over the Cuyama target area for both aircraft (429-hours) and ground (549-hours). These opportunities are likely due to the moist onshore flow associated with winter storms having increased orographic lift over the higher terrain of the northeastern side of Santa Barbara County and the northwestern side of Ventura County. March had the most opportunities, due to storm

frequency and colder temperatures. The aircraft seeding opportunities were somewhat more evenly spread across the winter.

Based on the wind direction analysis, generators and aircraft track should be located to the west-southwest of the project area. Winds speeds suggest that the ground-based equipment would be sited about 15 miles away from the target area, and the variable distance aircraft tracks would range from 20 to 30 miles west or southwest of the target area.

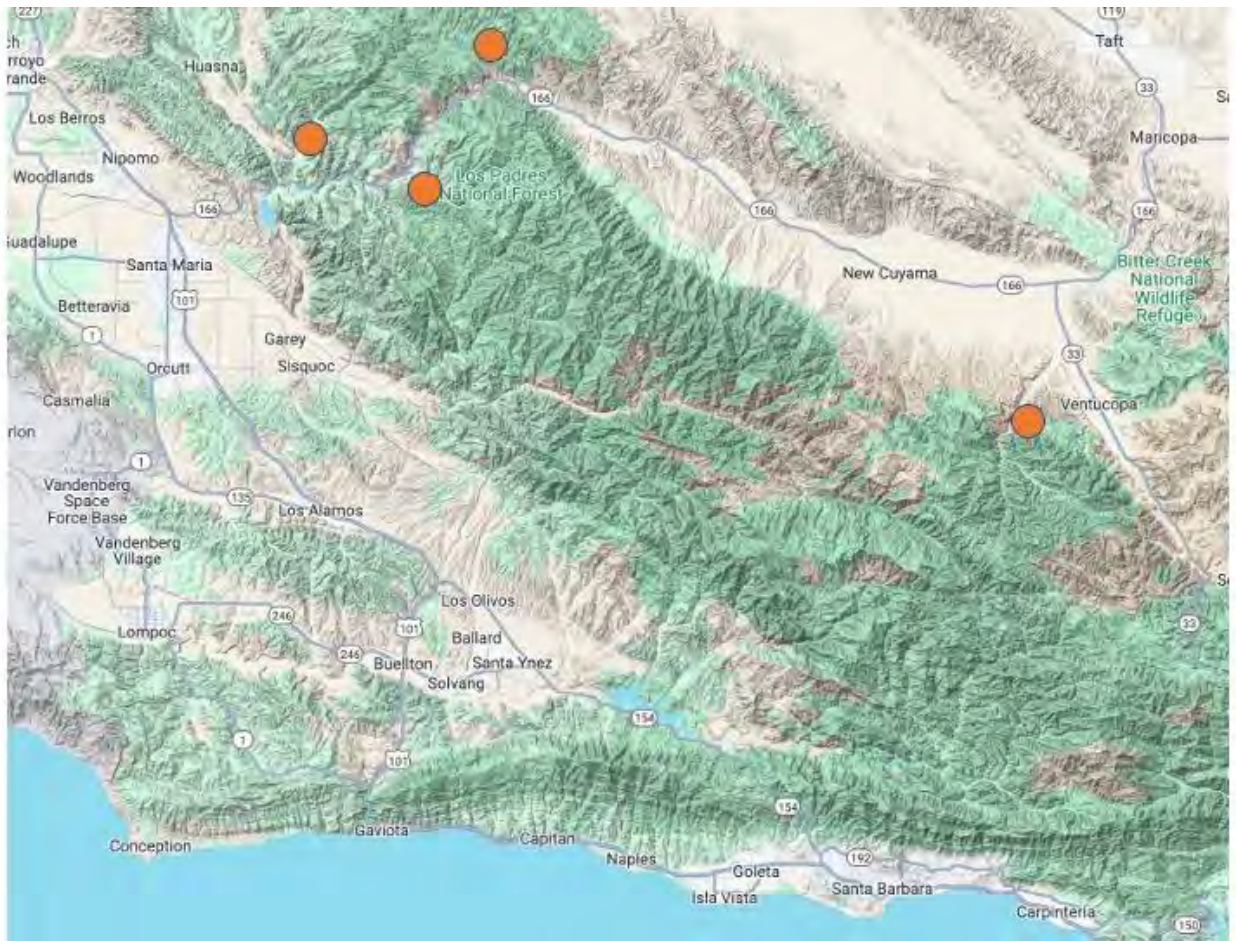
## 3.2 Task 2: Targeting Assessment Using Snow Chemistry

### 3.2.1 Methodology

One of the main challenges of conducting cloud seeding from the ground is ensuring that the cloud seeding materials (silver iodide (AgI)) reach clouds with temperatures colder than  $-5^{\circ}\text{C}$  and the newly formed seeded snow is deposited in the target area. Successful targeting can be potentially proven by showing slightly elevated silver concentrations in fresh snow. Measurements from the Sierra Nevada and Colorado have shown about 40 parts per trillion for seeded fresh snow/precipitation compared to about 4 parts per trillion (ppt) in unseeded. With the project location so close to the Coast, storm winds are typically onshore. Since very limited crustal silver is found over oceans, we expect very low values of silver in observed unseeded precipitation. This means that a lower positive threshold of 3-4 ppt may show successful targeting. For this study, 4 parts per trillion (ppt) was used as the threshold to delineate between seeded and unseeded precipitation.

It should be noted that in soil samples in the western US silver is found in the 10s to 100s of parts per billion to parts per millions, depending of the geography and geologic history of the area. This is 100,000 times more than the quantities of silver typically found in fresh seeded precipitation.

DRI personnel collected precipitation samples during one winter storm event. The collections were done in the Cuyama Headwaters and several locations across the active Santa Barbara Twitchell target area cloud seeding program. Unfortunately, the Santa Ynez-Cachuma project was suspended for the winter 2023-2024 winter and no active seeding was conducted during the collection period. Figure 18 shows the collection locations on a topographic map of the Twitchell and Cuyama Headwaters target area.



*Figure 18: Topographic map of Greater Cuyama River area. Orange dots show the precipitation collection locations for the February 1, 2024 seeded storm. The Alamo Creek site is on the west side of the image. The Willow Springs site is on a ridge to the southeast of Alamo, the Cable Corral site in to the northeast. The Cuyama Headwaters site was in the Santa Barbara Canyon on east side of image.*

Figure 19 shows the general precipitation sampling process (shown for snow in the figure). Prior to the storms, precipitation collection tubes with sterile bags were deployed to catch falling rain. After the storm events, the collection tubes and bags with the fresh samples were collected and quickly frozen with dry ice to minimize the samples moving around within the sterile bags. Next the samples were transported frozen to DRI. Finally, the samples were analyzed for silver content using the DRI Ultra Trace Chemistry Lab.

If elevated silver values were found in the seeded precipitation collections, then the generator locations are successfully depositing the seeding material (silver iodide, ice nuclei) in the target area. This would confirm that the generators are well placed to seed the clouds.

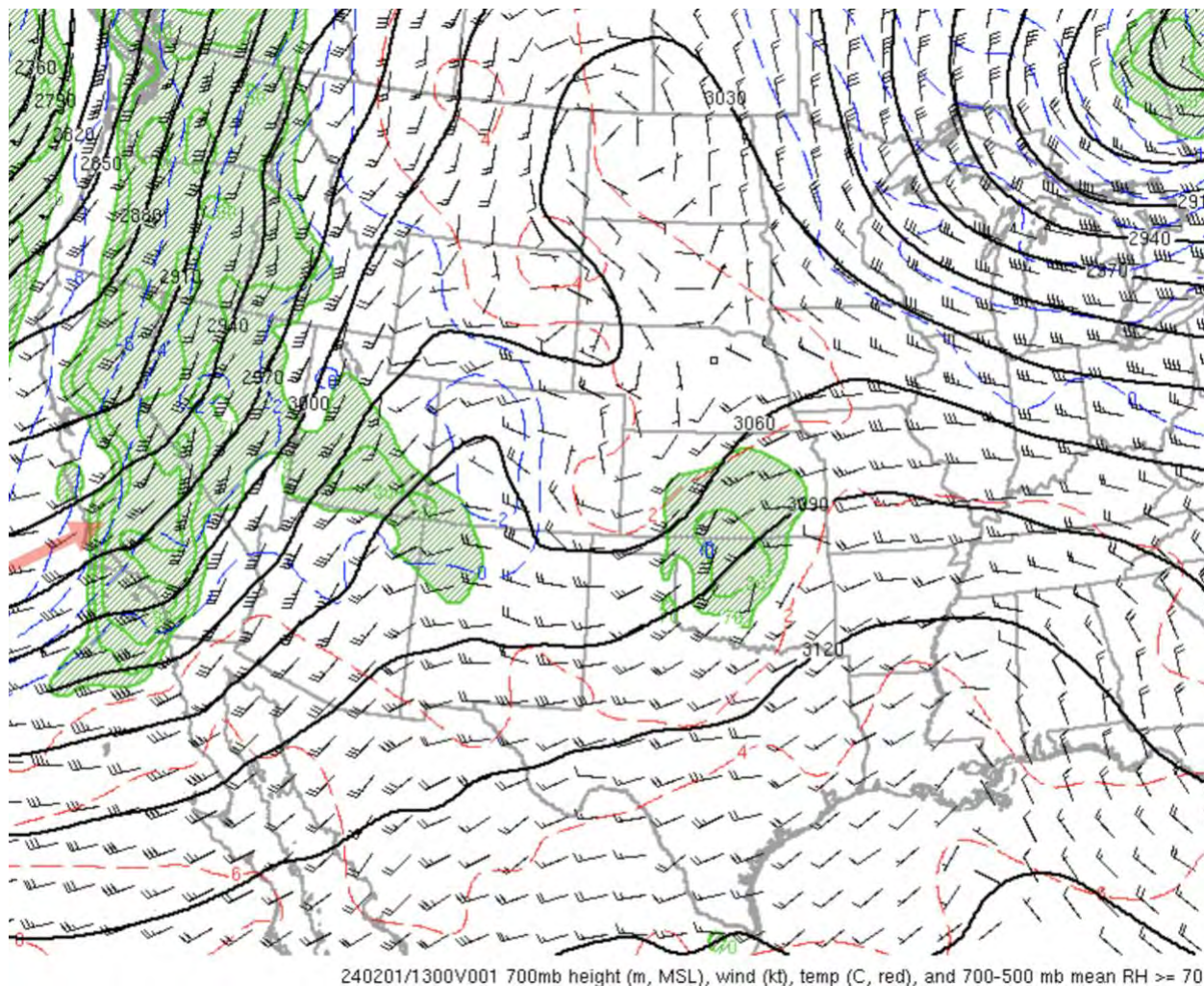




*Figure 19: DRI snow chemistry collection and analysis methods*

### 3.2.2 Snow Chemistry Collection Case Analysis

On Jan 31, 2024, a trough and associated cold front were approaching the central California Coast. Four collection tubes were set up in the morning and early afternoon of January 31, 2024 at Santa Barbara Canyon, Alamo, Willow Springs, and Cable Corral, ahead of the arrival of the clouds and precipitation associated with the weather system (see Figure 18 for locations). The storm moved into the area during the evening of January 31 and the early morning of February 1, 2024. Figure 20 shows the 10,000' MSL (700mb) upper air weather map valid at 1100 UTC. Moisture associated with a cold front is seen moving across the area under southwesterly winds. Seeding was conducted during evening of Jan 31, 2024 - Feb 1, 2024 between 1237AM and 0151AM PST, and another 4-minute flare was burned at 0657 AM. The flares were burned at the 3 generator sites along the western Santa Barbara Coast (Lopse, Harris, Berros [see Figure 5 for locations]).



*Figure 20: Case 1: February 1, 2024 at 1100 UTC (3AM PST) 10,000' MSL (700mb) upper air weather map. Moisture (green shading) associated with a cold front (blue dashed lines) is seen moving across the area under southwesterly winds*

### 3.2.3 Collection Results

Precipitation samples were obtained from the four collection locations on the early afternoon of February 1, 2024. The weather maps showed the wind directions and associated seeding plumes from the cloud seeding generators would have moved into the active Twitchell target area, and potentially into the distant Cuyama Headwaters area during the storm. Table 4 gives the values of silver found in the precipitation collection samples for the January 31, 2024 – February 1, 2024 storm for each collection location. The samples show slightly elevated silver concentrations at all three collection locations in the Twitchell target area, but nothing (< 1ppt) in the Santa Barbara Canyon sample. It is worth noting that the Santa Barbara County Twitchell Project sample values were much lower than is typically found in other projects, being between 3.7 to 7.1 ppt, but very low amounts of silver are typically released during flare-based seeding operations, so these results may show that seeding material was captured in the precipitation samples. The results suggest that the Twitchell Project was not seeding the Cuyama Headwaters region during this storm.



*Table 4: Amount of Silver Measured from Precipitation Collection Samples.*

Storm Date	Collection Location			
	Santa Barbara Canyon	Alamo	Willow Springs	Cable Corral
<b>Jan 30 – Feb 1, 2024</b>	< 1 ppt	7.1 ppt	6.6 ppt	3.7 ppt

### 3.2.4 Snow Chemistry Discussion

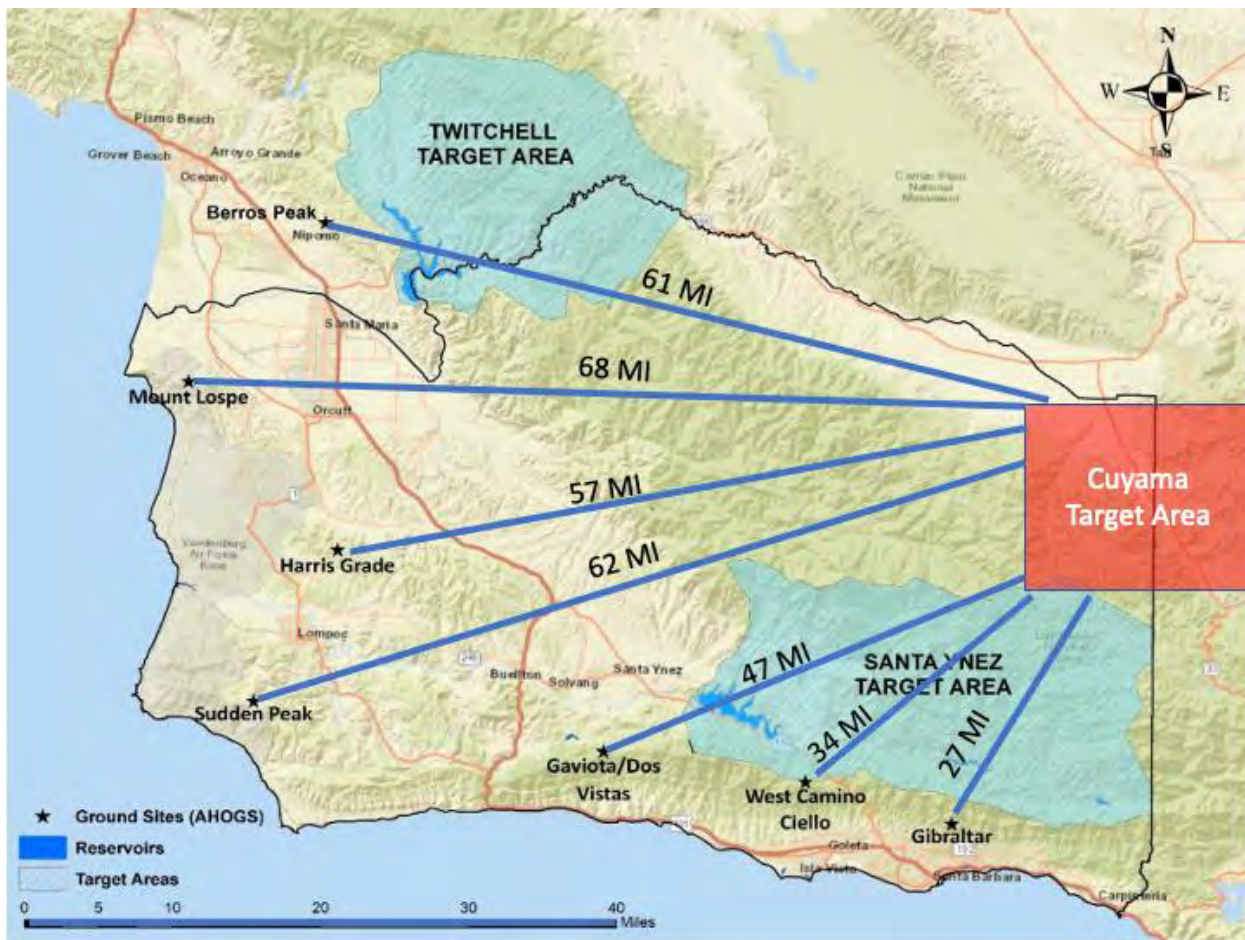
While only one sample was collected from one storm for the Cuyama target area, the results show low values of the seeding materials in the samples from the collection sites within the Twitchell target area and no evidence of a seeding effect in the sample from the Cuyama target area. In terms of temperatures, wind speeds, and directions this storm is fairly representative of many storms crossing the area. The location of the generators being approximately 60 miles away from the Cuyama target area, and wind speeds of 35 MPH covering a 60+ mile distance between the generator release locations, suggests any seeding material will take nearly 2 hours to reach the Cuyama target area. By this time the seeding material would be highly dispersed, and if precipitation was present upwind the seeding material would also be removed. In addition, the short burn times of the ground based-seeding flares (4-minutes) makes it improbable that the current project is having any effect on the Cuyama headwaters, and thus the result of no (< 1ppt) detectible silver in the sample from the target area makes sense. This discussed in more detail in Task 3

## 3.3 Task 3: Potential Precipitation Increases and Hypothetical Project Design

### 3.3.1 The current Santa Barbara County project is not seeding Cuyama Headwaters.

The results of the climatology from task 1 showed that when ground seeding conditions are present over the Cuyama Headwaters the winds are typically from the southwest through west with speeds of 30 to 60 MPH (see Figure 12). This suggests that 5 of the 7 generators are upwind of the Cuyama target area during seedable periods of the majority storms. Figure 21 shows the Santa Barbara Cloud Seeding project and generator sites, including the distance from the sites to the Cuyama target area. The 4 sites to the west (Berros Peak, Mount Lopse, Harris Grade, and Sudden Peak) are between 57 miles and 68 miles away from the Cuyama Headwaters. This is much too far to successfully seed the potential Cuyama Target area, especially since the generator sites currently use silver iodide flares that only burn for 4 minutes. These distances, coupled with the typical wind speeds between 30 to 60 MPH, means a seeding plume would take between one to two hours to reach the Cuyama area, which isn't realistic due to dispersion of such small seeding plumes. While, generally any seeding effect would occur within about 30 minutes of contact with SLW containing clouds. In addition, wet deposition, which is the removal of atmospheric aerosols that occurs by precipitation capture as rain falls through the atmosphere, would also have removed all of the cloud seeding material well

upstream of the Cuyama Target Area. The Gaviota/Dos Vistas generator is southwest of the target area and also within the climatological maximum upstream wind directions. This site, at 47 miles away, is still too far away from the Cuyama headwaters to successfully seed. The two other sites, West Camino Ciello at 34 miles, and Gibraltar at 27 miles, are much closer but still further than the optimal 15 miles away from the Cuyama target area. Those two sites also are to the south-southwest and south of the target area and not in the climatological favored wind directions envelope, and not often operated.



*Figure 21: Santa Barbara County Cloud Seeding project areas (green shading), Cuyama Target Area, cloud seeding generators (black stars), Distance each of the generators to the Cuyama target area. generator network*

When Twitchell and Santa Ynez (Cachuma) aircraft operations were present the aircraft tracks analyzed would also not have significantly impacted the Cuyama Target area. Similar to the reasons presented about for ground operations, the aircraft tracks were located too far from the Cuyama Headwaters to impact that area.

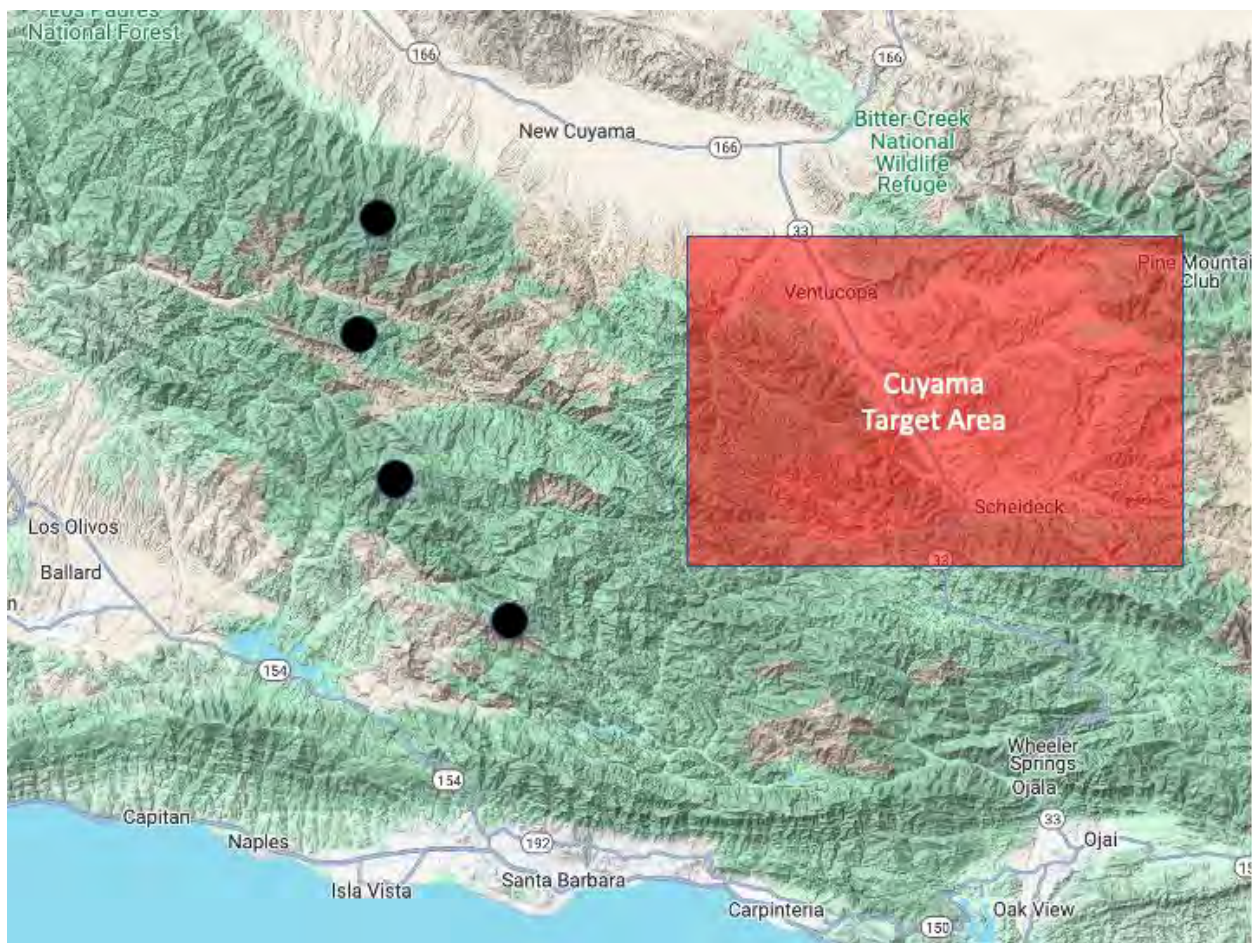


This analysis along with the snow chemistry shows that the existing Santa Barbara County Cloud Seeding Project is not seeding the Cuyama Headwaters and therefore potential increases from current project do not exist.

### 3.3.2 Design and results of a potential Cuyama Headwaters cloud seeding project

The results of the analysis from the 5-year climatology study presented in task 1 suggests cloud seeding targeting the Cuyama Headwaters could be done from both the ground or from aircraft.

A ground seeding program would include approximately 4 solution-based generators the continuously produce seeding material, as opposed to the ground-based flare generators. The most ideal locations for these would be on highest terrain available approximately 15-miles to the west and southwest of the target area. A first cut at the placement of 4 ground-based cloud seeding generators are shown in Figure 22.



*Figure 22. Conceptual model of a ground-based cloud seeding network targeting the Cuyama River Headwaters. Black dots are the cloud seeding generator locations and the red box indicates Cuyama target area.*

Ground-based solution generators can produce approximately 20 acre-feet of liquid precipitation per hour, sometime more (Huggins, 2009). If this network was in place during the 5-winters analyzed in section 3.1, and we assume that half of the hours were seeded, then the potential increases in precipitation can be calculated using the below equation, where acre-feet is abbreviated as af. We use 50% due to storm variability, meteorologist forecasting errors, and potential generator mechanical issues.

$$(\text{seeding hours}) * (4 \text{ generators}) * (20 \frac{\text{af}}{\text{hour}}) = \text{af of additional water resources}$$

The total acre-feet of additional precipitation for each year are presented in Table 5. The results show that over 2,000 acre-feet of additional precipitation can potentially be produced during the very dry water year 2022 and as much as 8,500 acre-feet could be produced during the wet winter of 2022-2023.

To set up a 4-generator ground program would require a first-year investment in the fabrication of the generators, about \$60,000 per generator. Locations for the generators would need to be found and potential land use agreements (typically \$500/year) be completed. Since there is already a Santa Barbara County/Cuyama River cloud seeding program, it is currently unclear if a new California Environmental Quality Assessment (CEQA) would be required for this project. Finally, notification in public media would be required to notify the public about the project, and a public meeting in the project area would be required.

Once the project was operational, it would cost approximately \$100,000 per year to operate the project. Assuming 5,000 acre-feet could be produced on an average winter the cost-benefit would be \$20 per acre-foot of additional precipitation.

*Table 5: Potential precipitation increases from a 4-generator network seeding the Cuyama Headwaters.*

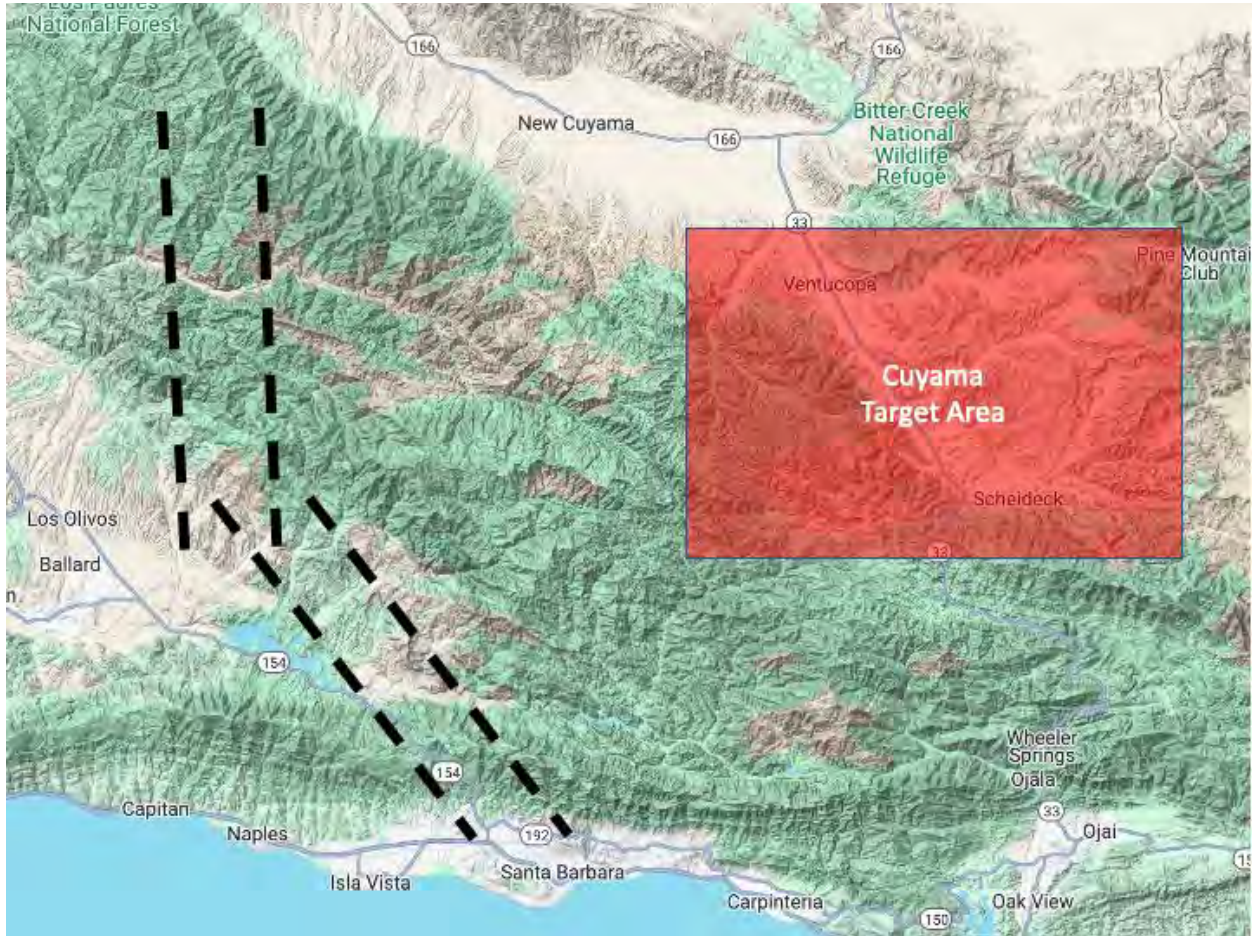
Water Year	Seeding Hours (hrs)	Number of Generators	Precipitation Increases (acre-feet)
<b>2020</b>	46	4	3,680
<b>2021</b>	43	4	3,440
<b>2022</b>	26	4	2,080
<b>2023</b>	107	4	8,560
<b>2024</b>	52	4	4,160
<b>Total</b>	274	4	21,920

Aircraft seeding can produce up to 200 acre-feet of additional precipitation per hour when cloud seeding conditions are present (Huggins, 2009). Using the flight tracks identified in Figure 23, and assuming that 25% of the defined aircraft seedable hours from sections 3 were flown for each of the 5 water years, then the potential increases in precipitation can be calculated using the below equation, where acre-feet is abbreviated as af. We use an estimate of 25% due to aircraft operational restrictions, pilot rest time, and refueling time.



$$(\text{seeding flight hours}) * \left(200 \frac{\text{af}}{\text{hour}}\right) = \text{af of additional water resources}$$

The results for a hypothetical aircraft program are shown in Table 6. The results show that 2,200 acre-feet of additional precipitation could be produced during the dry water year 2022 and as much as 7,600 acre-feet of additional precipitation could be produced during the wet water year 2023.



*Figure 23: Conceptual model of an aircraft-based cloud seeding network targeting the Cuyama River Headwaters. The dashed lines indicate the potential aircraft seeding flight tracks and the red box indicates the Cuyama Target area.*

*Table 6: Potential precipitation increases from an aircraft seeding program targeting the Cuyama Headwaters.*

Water Year	Flight seeding hours (hours)	Precipitation Increases (acre-feet)
<b>2020</b>	20	4,000
<b>2021</b>	12	2,400
<b>2022</b>	11	2,200
<b>2023</b>	38	7,600
<b>2024</b>	28	5,600
<b>Total</b>	109	21,800

To set up an aircraft program may require an environmental assessment to be completed. Since there is already a Santa Barbara County cloud seeding program, it is currently unclear if a new California Environmental Quality Assessment (CEQA) would be required for this project. Notification in public media would be required to notify the public about the project, and a public meeting in the project area would be required.

Once the project was operational, it would cost approximately \$200,000 per year to conduct 20-hours of aircraft seeding. The aircraft seeding results would produce between 200 – 500 acre-feet per hour, with as much 10,000 acre-feet possible. The cost-benefit for this best-case scenario would be \$20 per-acre foot.

## 4 Summary Of Findings

This study assessed if the storms crossing the headwaters region of the Cuyama River had cloud seeding conditions, and if the existing Santa Barbara County cloud seeding program was currently seeding the Cuyama Headwater area.

The results of the study showed that the headwaters region of the Cuyama River are indeed seedable from both the ground and from the air during both dry and wet years. The month of March had by far the highest number of seedable events. The existing Santa Barbara County cloud seeding program is most likely not having an impact in this area, due to the long distances between the cloud seeding equipment and the Cuyama Headwaters. No cloud seeding signature was found from the precipitation chemistry collection effort.

A hypothetical cloud seeding program was designed and the results showed the potential for at least 2,000 acre-feet of additional precipitation could have been produced on the driest year of the study and over 8,000 acre-feet could have been produced on the wet years.

## 5 Recommendations

- 1) Contact Santa Barbara County and see if the Twitchell Program would benefit by seeding the Cuyama Headwaters.



- 2) Increase precipitation gauge numbers in the target area.
- 3) Set up a single ground-based solution-burning generator or aircraft project and operate a 2-year pilot program to determine the success of a seeding program.
- 4) Do several additional rounds of precipitation, soil, and stream chemistry over the area to establish base-line values. Then do extensive precipitation chemistry analysis during the pilot program.

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TO: Board of Directors  
Agenda Item No. 11a

FROM: Brian Van Lienden, Woodard & Curran

DATE: March 5, 2025

SUBJECT: Discuss and Take Appropriate Action on Water Year 2023-2024 Annual Report

**Recommended Motion**

Approve the Water Year 2023-2024 Annual Report.

**Discussion**

In compliance with the Sustainable Groundwater Management Act, annual reports on basin sustainability metrics and progress on Groundwater Sustainability Plan implementation must be submitted to the California Department of Water Resources (DWR) by April 1st of each year.

A summary of the draft annual report for Water Year 2023-2024 (October 1, 2023 through September 30, 2024) is provided as **Attachment 1**, and the full report is provided as **Attachment 2** for consideration of approval.



Cuyama Basin Groundwater Sustainability Agency

Discuss and Take Appropriate Action on  
Water Year 2023-2024 Annual Report

March 5, 2025





# Annual Report Timeline

- DWR SGMA regulations require that an Annual Report be submitted each year by April 1<sup>st</sup> each year
- Staff is requesting approval of the [Annual Report](#)

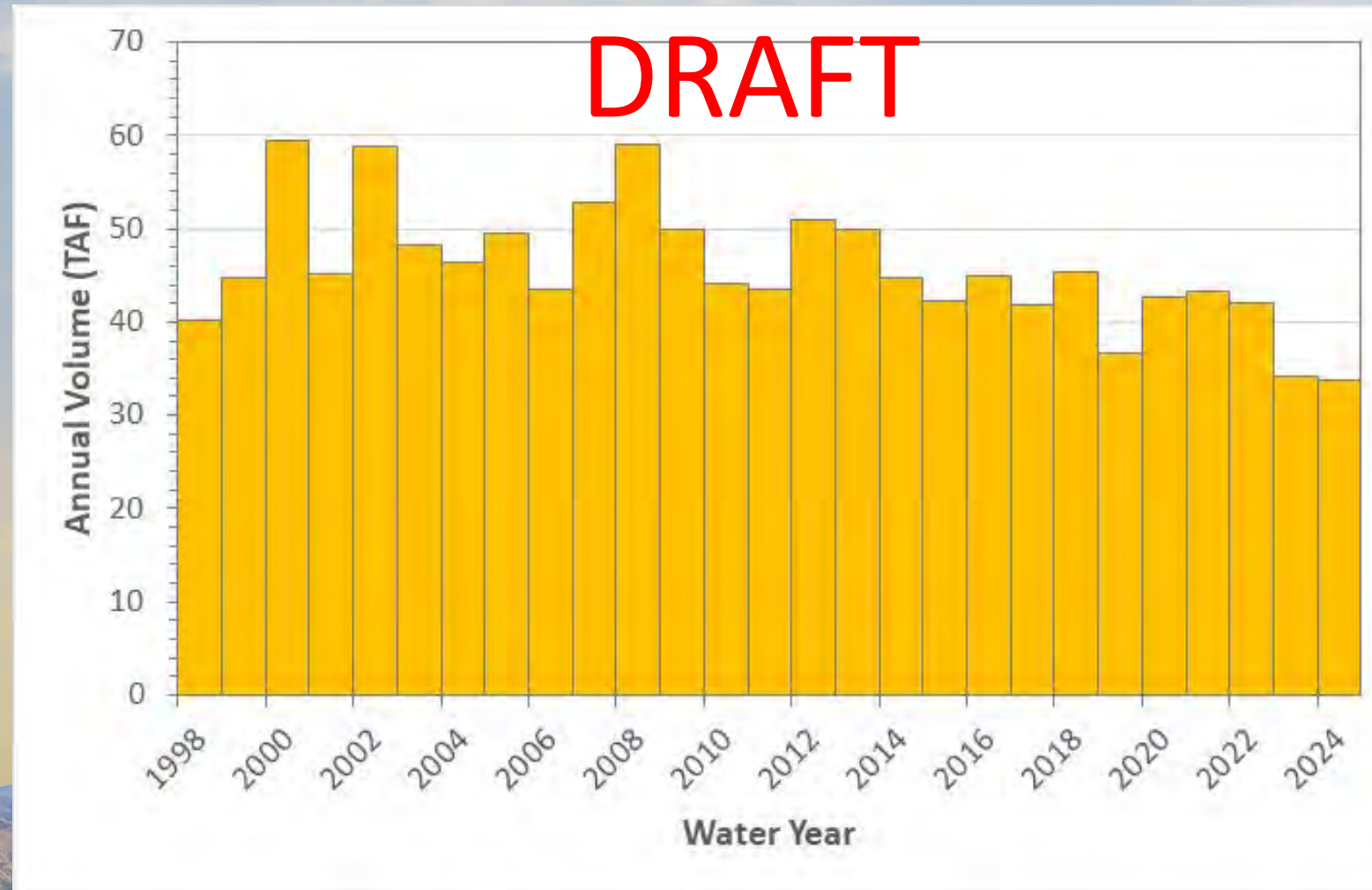


# Data and Model Updates

- Groundwater elevations:
  - Available data collected for all wells in monitoring network through 2024
- Groundwater model update
  - Historical model period is extended through 2024
    - Annual Report model reflects the model updates that were completed in 2024
  - Updated land use, precipitation and evapotranspiration data collected for 2024
    - Updated land use data has been provided for 2024 period by local landowners
    - LandIQ also developed land use estimates for 2024; this was used to supplement local landowner data

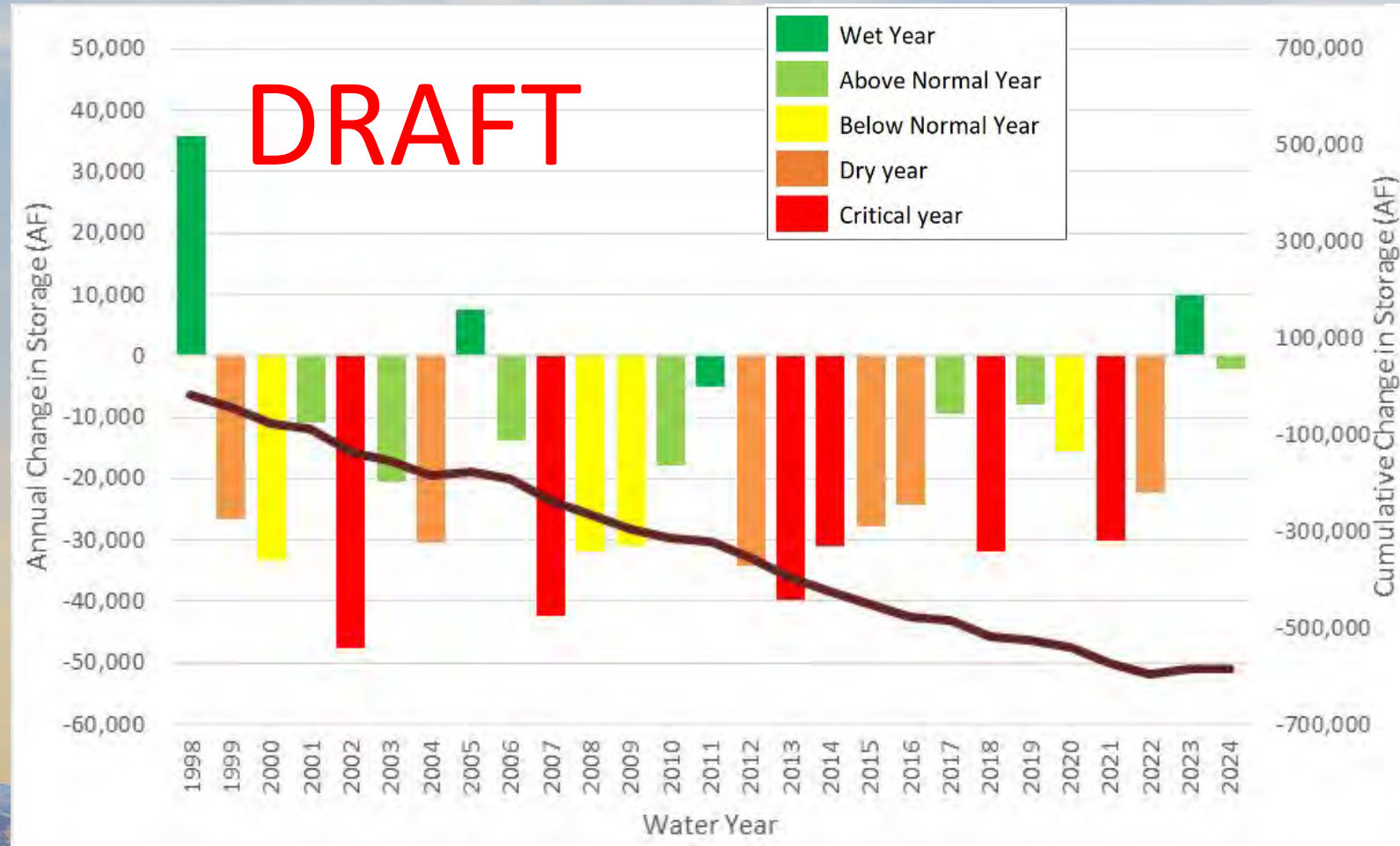
# Estimated Groundwater Extraction

- Estimated groundwater extractions:
  - 2022: 41,900 AF
  - 2023: 34,100 AF
  - 2024: 33,800 AF



# Change in Groundwater Storage

- Estimated change in storage:
  - 2022: -22,200 AF
  - 2023: +9,900 AF
  - 2024: -2,100 AF



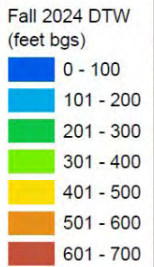


# Updated Groundwater Conditions Figures

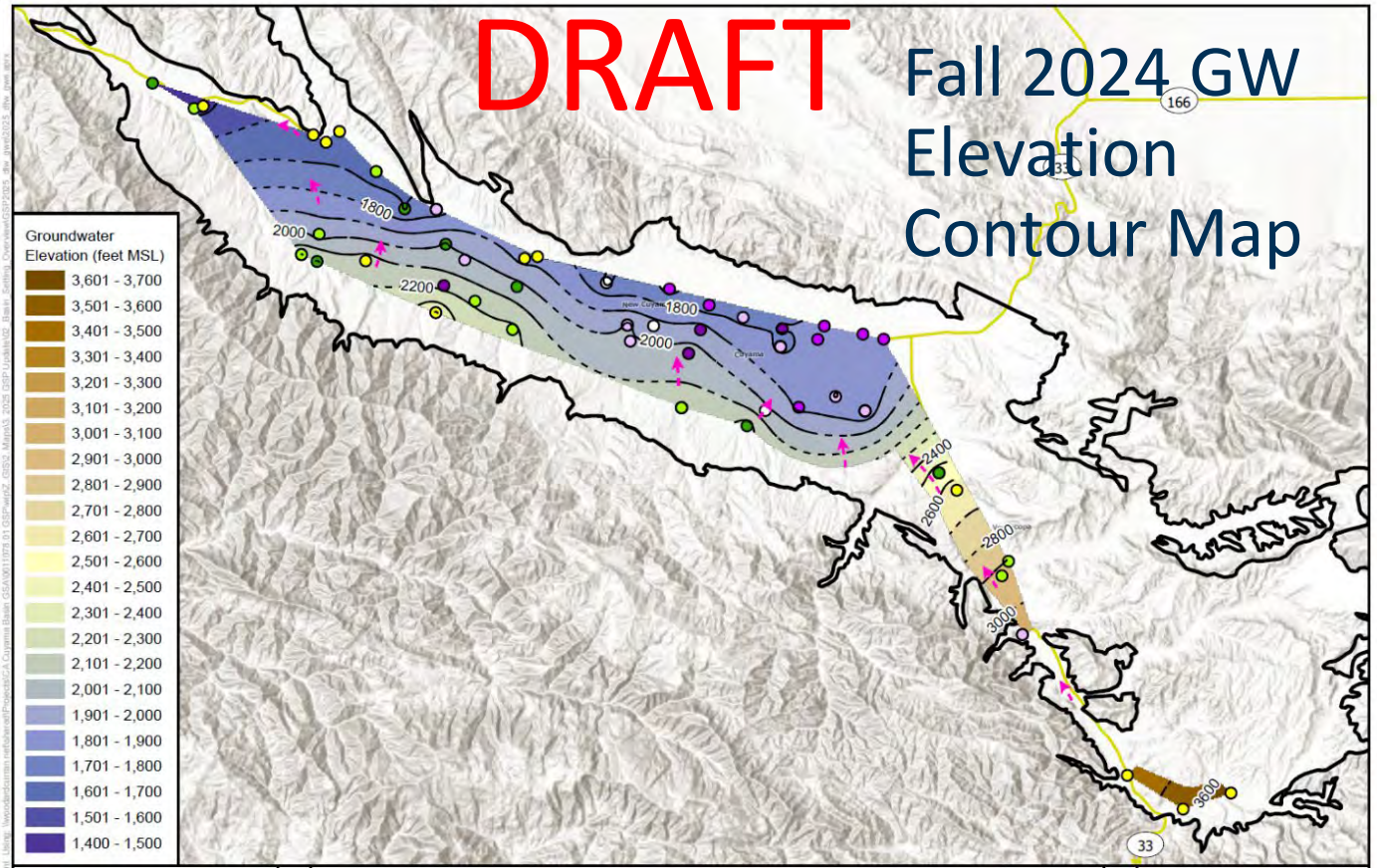
Updated Contour Maps were created for 2024 (Spring and Fall)

Fall 2024 Depth to GW Contour Map

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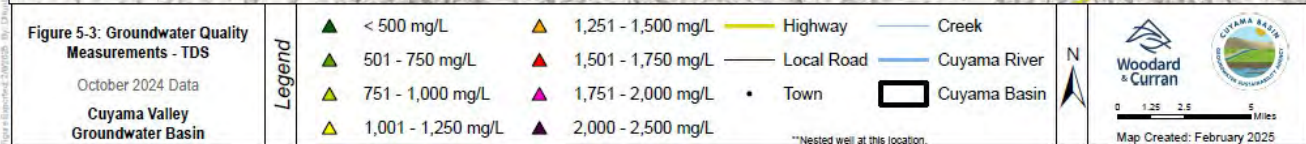
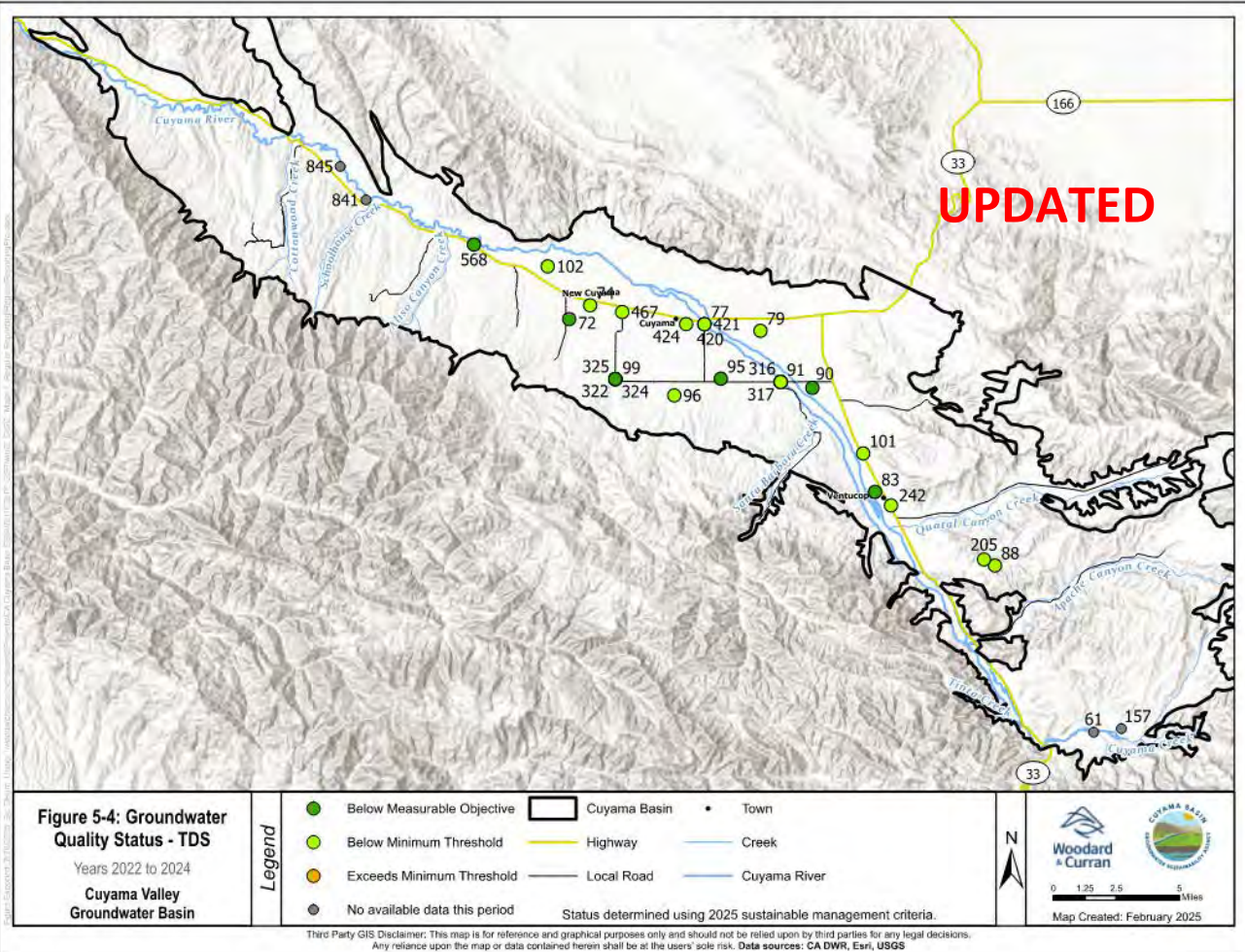
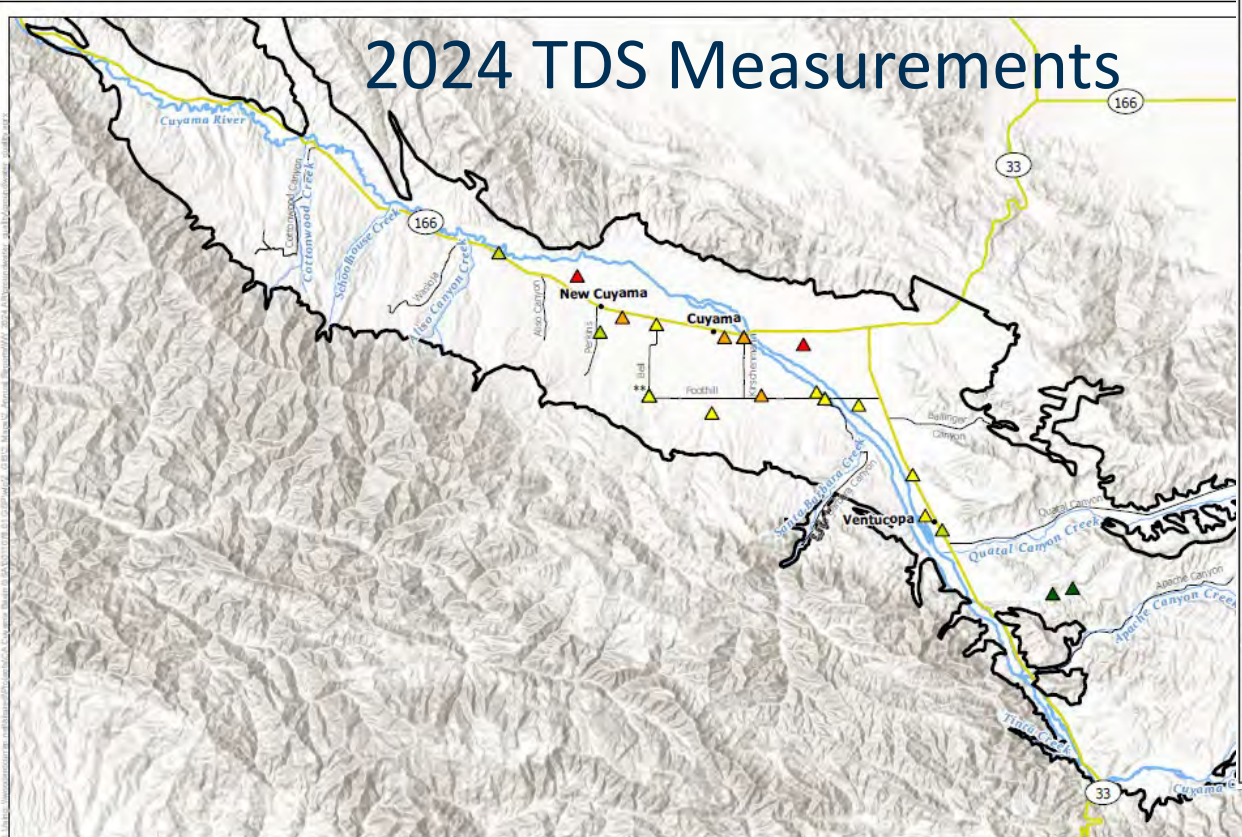


**DRAFT** Fall 2024 GW Elevation Contour Map





# Salinity (TDS) Conditions Figures **DRAFT**







**Cuyama Basin  
Groundwater Sustainability Plan—  
Draft Annual Report for 2023-2024 Water Year**

Prepared by:



**March 2025**

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Appendix A: Updated Hydrographs for Representative Wells



## Abbreviations and Acronyms

AF	acre-feet
CBGSA	Cuyama Basin Groundwater Sustainability Agency
CBWD	Cuyama Basin Water District
CBWRM	Cuyama Basin Water Resources Model
CCSD	Cuyama Community Services District
DMS	Data Management System
DWR	California Department of Water Resources
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
SAC	Standing Advisory Committee
SBCWA	Santa Barbara County Water Agency
SGMA	Sustainability Groundwater Management Act
SR	State Route
TSS	Technical Support Services
USGS	United States Geological Survey

## Executive Summary

§356.2 (a)	General information, including an executive summary and a location map depicting the basin covered by the report.
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### ES-1 Introduction

In 2014, the California legislature enacted the Sustainable Groundwater Management Act (SGMA) in response to continued overdraft of California’s groundwater resources. The Cuyama Groundwater Basin (Basin) is one of 21 basins and subbasins identified by the California Department of Water Resources (DWR) as being in a state of critical overdraft. SGMA requires that a Groundwater Sustainability Plan (GSP) be prepared to address the measures necessary to attain sustainable conditions in the Cuyama Groundwater Basin. Within the framework of SGMA, sustainability is generally defined as the conditions that result in long-term reliability of groundwater supply and the absence of undesirable results.

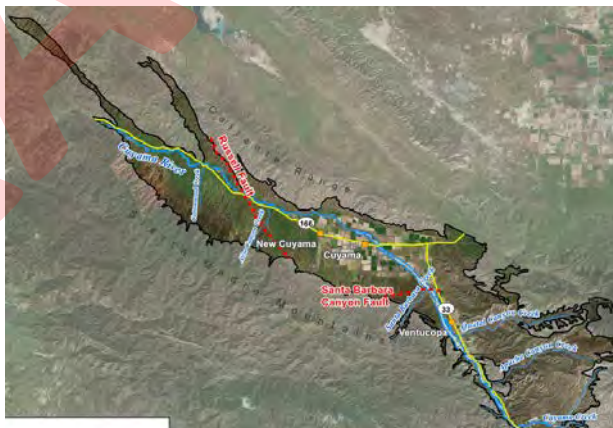
In response to SGMA, the Cuyama Basin Groundwater Sustainability Agency (CBGSA) was formed in 2017. The CBGSA is a joint-powers agency that is comprised of Kern, Santa Barbara, San Luis Obispo and Ventura Counties, plus the Cuyama Community Services District and the Cuyama Basin Water District. The CBGSA is governed by an 11-member Board of Directors, with one representative from Kern, San Luis Obispo and Ventura counties, two representatives from Santa Barbara County, one member from the Cuyama Community Services District, and five members from the Cuyama Basin Water District.

The Draft Cuyama Basin GSP was adopted on December 4, 2019 by the CBGSA and submitted to DWR on January 28, 2020. SGMA requires that the CBGSA develop a GSP that achieves groundwater sustainability in the Basin by the year 2040.

On January 21, 2021, DWR determined that the GSP was “incomplete” and recommended CBGSA to amend the GSP to address four corrective actions. To address these corrective actions, CBGSA developed supplemental sections to the GSP and resubmitted to DWR on July 18, 2022. On March 2, 2023, DWR announced that the Revised GSP had been Approved.

In compliance with SGMA Regulations the 2025 GSP Update was developed and approved by the CBGSA in November of 2024. The 2025 GSP update incorporated recent monitoring data, an updated groundwater model, new information and studies, and updated monitoring networks and sustainable management criteria (SMC). The updated GSP was submitted to DWR on January 29, 2025. The jurisdictional area of the CBGSA is defined by DWR’s Bulletin 118, 2013, the 2016 Interim Update, and the latest 2020 update. The Cuyama Groundwater Basin generally underlies the Cuyama Valley, as shown in **Figure ES-1**.

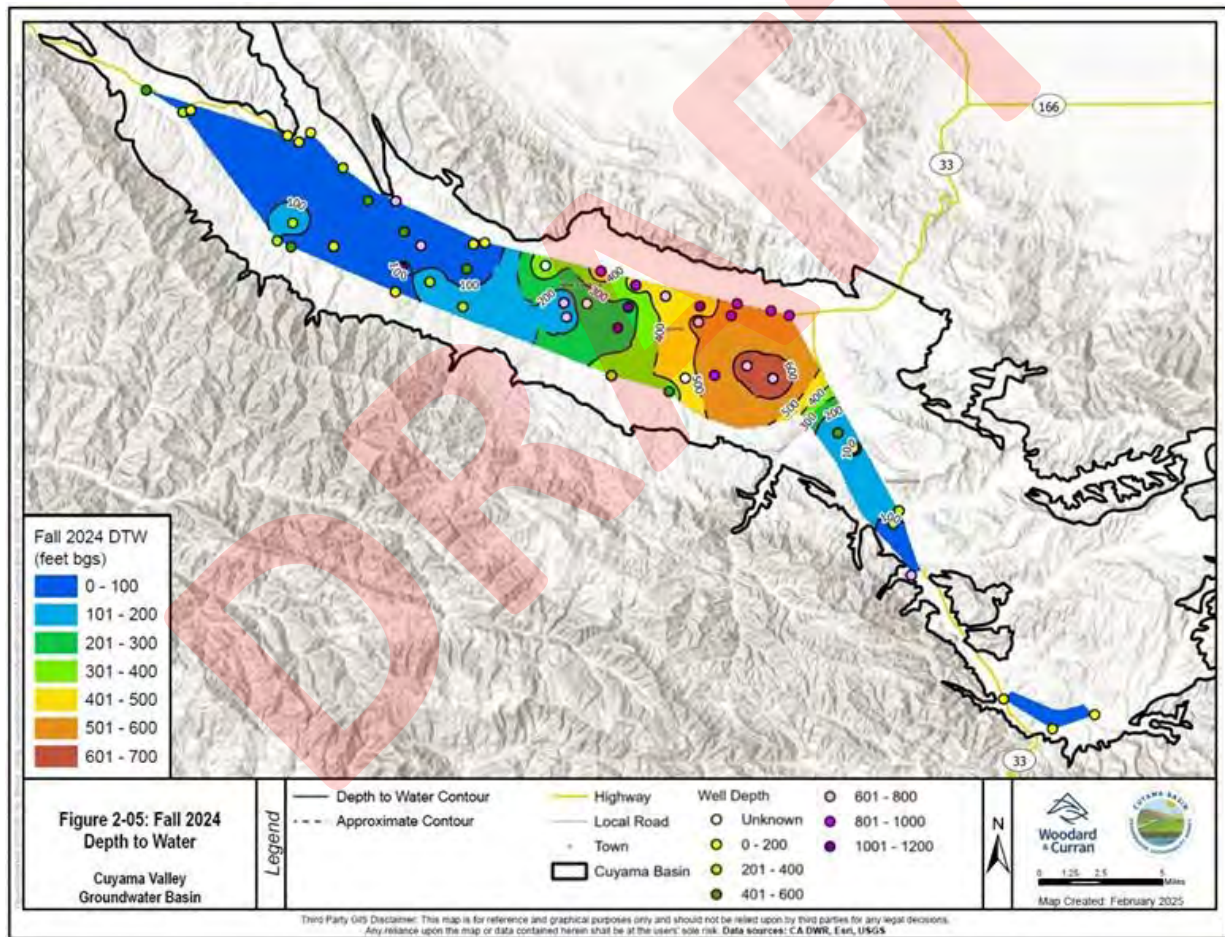
**Figure ES-1: GSP Plan Area**



## ES-2 Groundwater Levels

The Annual Report for the 2024 water year includes groundwater contours for Spring and Fall of 2024, and updated hydrographs for the groundwater level monitoring network identified in the Cuyama Basin GSP. The Cuyama Basin consists of a single principal aquifer, and water levels in Basin monitoring wells are considered representative of conditions in that aquifer. Groundwater levels in some portions of the Basin have been declining for many years while other areas of the Basin have experienced no significant change in groundwater levels. Groundwater levels vary across the Basin, with the highest depth to water occurring in the central portion of the Basin (**Figure ES-2**). The western and eastern portions of the Basin have generally shallower depth to water. Generally, depth to water and groundwater elevation in 2024 have changed a small amount in the central basin compared to 2023 levels with little change in other parts of the basin.

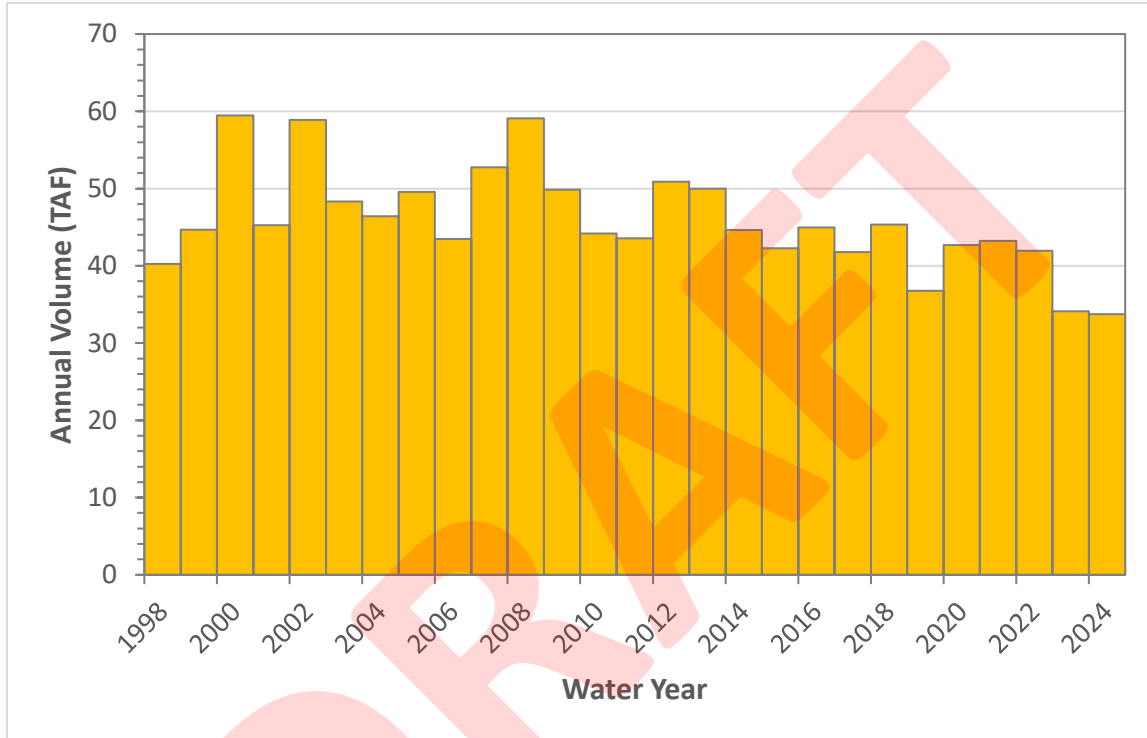
**Figure ES-2: Cuyama Basin Depth to Water Contour Map (Fall 2024)**



### ES-3 Water Use

The Cuyama Groundwater Basin is supplied entirely by groundwater, with virtually no surface water use. Groundwater pumping in the Basin is estimated to have been about 33,700 AF in 2024. This reflects a decrease of about 16,200 AF as compared to 2023. (See **Figure ES-3**).

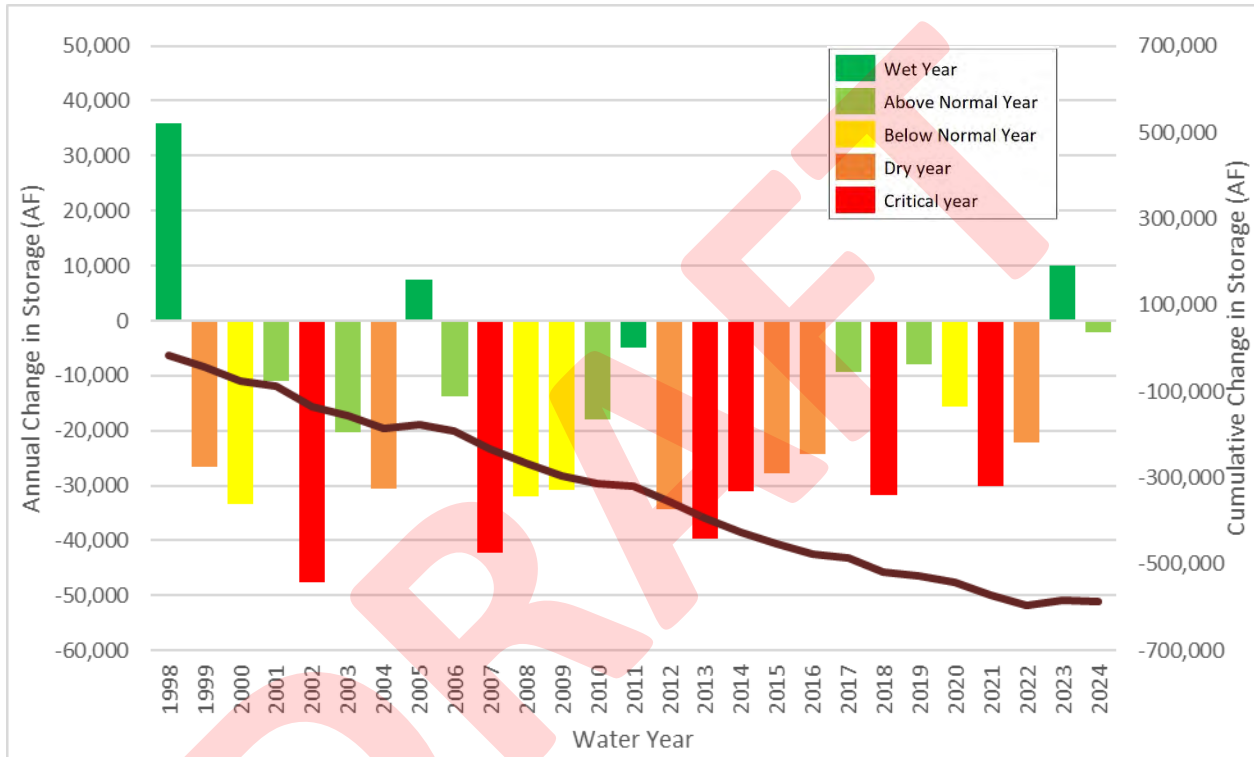
**Figure ES-3: Annual Groundwater Extraction in the Cuyama Basin in Water Years 1998-2024**



## ES-4 Change in Groundwater Storage

It is estimated that there was a decrease in Basin groundwater storage of 2,100 AF in 2024. There continues to be a long-term trend in groundwater storage reduction in the Basin since 1999. **Figure ES-4** shows the historical change in groundwater storage by year, water year type,<sup>1</sup> and cumulative water volume in each year for the period from 1998 through 2024.

**Figure ES-4: Change in Groundwater Storage by Year, Water Year Type, and Cumulative Water Volume**



<sup>1</sup> Water year types are customized for the Basin watershed based on annual precipitation as follows:

- Wet year = more than 19.6 inches
- Above normal year = 13.1 to 19.6 inches
- Below normal year = 9.85 to 13.1 inches
- Dry year = 6.6 to 9.85 inches
- Critical year = less than 6.6 inches.



## **ES-5      Groundwater Quality**

Only 76% (19 of 25) of monitoring wells were sampled for total dissolved solids (TDS) in 2024. Approximately 68% (17 wells) of representative wells were lower (i.e. better) than their measurable objective and only 4% (one well) exceeded its minimum threshold for TDS.

## **ES-6      Land Subsidence**

Observed subsidence rates in the Basin are well below the minimum threshold, and thus undesirable results for subsidence are not occurring in the Basin.

## **ES-7      Plan Implementation**

The following plan implementation activities were accomplished in 2024:

- Implementation of a groundwater extraction fee and supplemental fee, which is expected to generate revenue to cover the administrative costs of the CBGSA for the period from January 1, 2025, through December 31, 2025.
- A total of eleven public meetings were conducted at which GSP development and implementation was discussed.
- The Cuyama Basin Groundwater Sustainability Agency (CBGSA) Board continued implementation of the groundwater levels monitoring network, includes quarterly monitoring at each monitoring well.
- The CBGSA continued to utilize the COD SGMA Implementation Grant for \$7.6 million in funding for implementation activities.
- The CBGSA and Cuyama Basin Water District (CBWD) continued implementation of management actions in the Central management area.

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DRAFT

## Section 1. Introduction

§356.2 (a)	General information, including an executive summary and a location map depicting the basin covered by the report.
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### 1.1 Introduction and Agency Information

This section describes the Cuyama Basin Groundwater Sustainability Agency (CBGSA), its authority in relation to the Sustainable Groundwater Management Act (SGMA), and the purpose of this Annual Report.

This Annual Report meets regulatory requirements established by the California Department of Water Resources (DWR) as provided in Article 7 of the California Code of Regulations, Title 23, Division 2, Chapter 1.5, Subchapter 2.

The CBGSA was created by a Joint Exercise of Powers Agreement among the following agencies:

- Counties of Kern, San Luis Obispo, and Ventura
- Santa Barbara County Water Agency (SBCWA), representing the County of Santa Barbara
- Cuyama Basin Water District (CBWD)
- Cuyama Community Services District (CCSD)

The CBGSA Board of Directors includes the following individuals:

- Cory Bantilan – Chairperson, SBCWA
- Derek Yurosek – Vice Chair –CBWD
- Deborah Williams –CCSD
- Byron Albano – CBWD
- Jimmy Paulding – County of San Luis Obispo
- Arne Anselm – County of Ventura
- Rick Burnes – CBWD
- Jane Wooster – CBWD
- Katelyn Zenger – County of Kern
- Matthew Young – Santa Barbara County Water Agency
- Steve Jackson – Cuyama Basin Water District

The CBGSA’s established boundary corresponds to DWR’s California’s Groundwater Bulletin 118 – Update 2003 (Bulletin 118) groundwater basin boundary for the Cuyama Valley Groundwater Basin (Basin) (DWR, 2003). No additional areas were incorporated.

#### 1.1.1 Management Structure

The CBGSA is governed by an 11-member Board of Directors that meets bi-monthly (i.e. six-times a year). A General Manager manages day-to-day operations of the CBWD, while Board Members vote on actions of the CBGSA; the Board is the CBGSA’s decision-making body. The Board also formed a Standing Advisory Committee comprised of nine stakeholders to provide recommendations to the Board on key technical issues which also meets regularly.

## 1.1.2 Legal Authority

Per Section 10723.8(a) of the California Water Code, the Santa Barbara County Water Agency (SBCWA) gave notice to DWR on behalf of the CBGSA of its decision to form a GSA, which is Basin 3-013, per DWR’s Bulletin 118.

## 1.1.3 Groundwater Sustainability Plan

The CBGSA Board of Directors approved the first iteration of the Cuyama Groundwater Sustainability Plan (GSP) on December 4, 2019. The GSP was submitted to DWR for approval on January 28, 2020.

On January 21, 2021, DWR determined that the GSP was “incomplete” and recommended CBGSA amend the GSP to address the following four corrective actions:

- Provide justification for, and effects associated with, the sustainable management criteria;
- Use of groundwater levels as a proxy for depletion of interconnected surface water;
- Further address degraded water quality; and
- Provide explanation for how overdraft will be mitigated in the basin.

To address these corrective actions, the CBGSA developed the following supplement sections to the GSP and resubmitted to DWR on July 18, 2022:

- Supplemental Section 2.2.7: Basin Settings, Groundwater Conditions, Groundwater Quality performed additional data collection efforts for nitrate and arsenic measurements.
- Supplemental Section 3.3: Undesirable Results, Evaluation of the Presence of Undesirable Results provided additional information regarding the rationale for the criteria used in the GSP to define the point at which Basin conditions cause significant and unreasonable effects to occur.
- Supplemental Section 4.10: Monitoring Networks, Depletions of Interconnected Surface Water Monitoring Network identifies a subset of groundwater level representative monitoring wells for use in ISW monitoring and provides a rationale for their selection and adequate data collection and monitoring for ISWs.
- Supplemental Section 5.2: Minimum Thresholds, Measurable Objectives, and Interim Milestones, Chronic Lowering of Groundwater Levels performed two technical analyses to provide additional information related to the effects of the GSP’s groundwater levels minimum thresholds and undesirable results on well infrastructure and on environmental uses of groundwater.
- Supplemental Section 5.5: Minimum Thresholds, Measurable Objectives, and Interim Milestones, Degraded Water Quality provides information on why groundwater management is unlikely to affect nitrate and arsenic concentrations.
- Supplemental Section 7.2: Projects and Management Actions, Management Areas provide additional information regarding the Ventucopa management area and the northwestern region of the Basin.
- Supplemental Section 7.6: Projects and Management Actions, Adaptive Management explains the circumstances of when adaptive management strategies may be also triggered for other reasons.

On March 2, 2023, DWR announced that the Revised GSP had been Approved.

The CBGSA prepared an updated GSP, which was approved in November 2024 and submitted to DWR in January 2025. The updated GSP incorporates newly collected data and updated groundwater model, updated sustainable management criteria, and updates to projects and management actions. The resubmitted and Updated 2025 GSP is available for viewing online at <http://cuyamabasin.org/>.

## 1.2 Plan Area

**Figure 1-1** shows the Basin and its key geographic features. The Basin encompasses an area of about 378 square miles<sup>2</sup> and includes the communities of New Cuyama and Cuyama, which are located along State Route (SR) 166, and Ventucopa, which is located along SR 33. The Basin encompasses an approximately 55-mile stretch of the Cuyama River, which runs through the Basin for much of its extent before leaving the Basin to the northwest and flowing toward the Pacific Ocean. The Basin also encompasses stretches of Wells Creek in its north-central area, Santa Barbara Creek in the south-central area, the Quatal Canyon drainage and Cuyama Creek in the southern area of the Basin. Most of the agriculture in the Basin occurs in the central portion east of New Cuyama, and along the Cuyama River near SR 33 through Ventucopa.

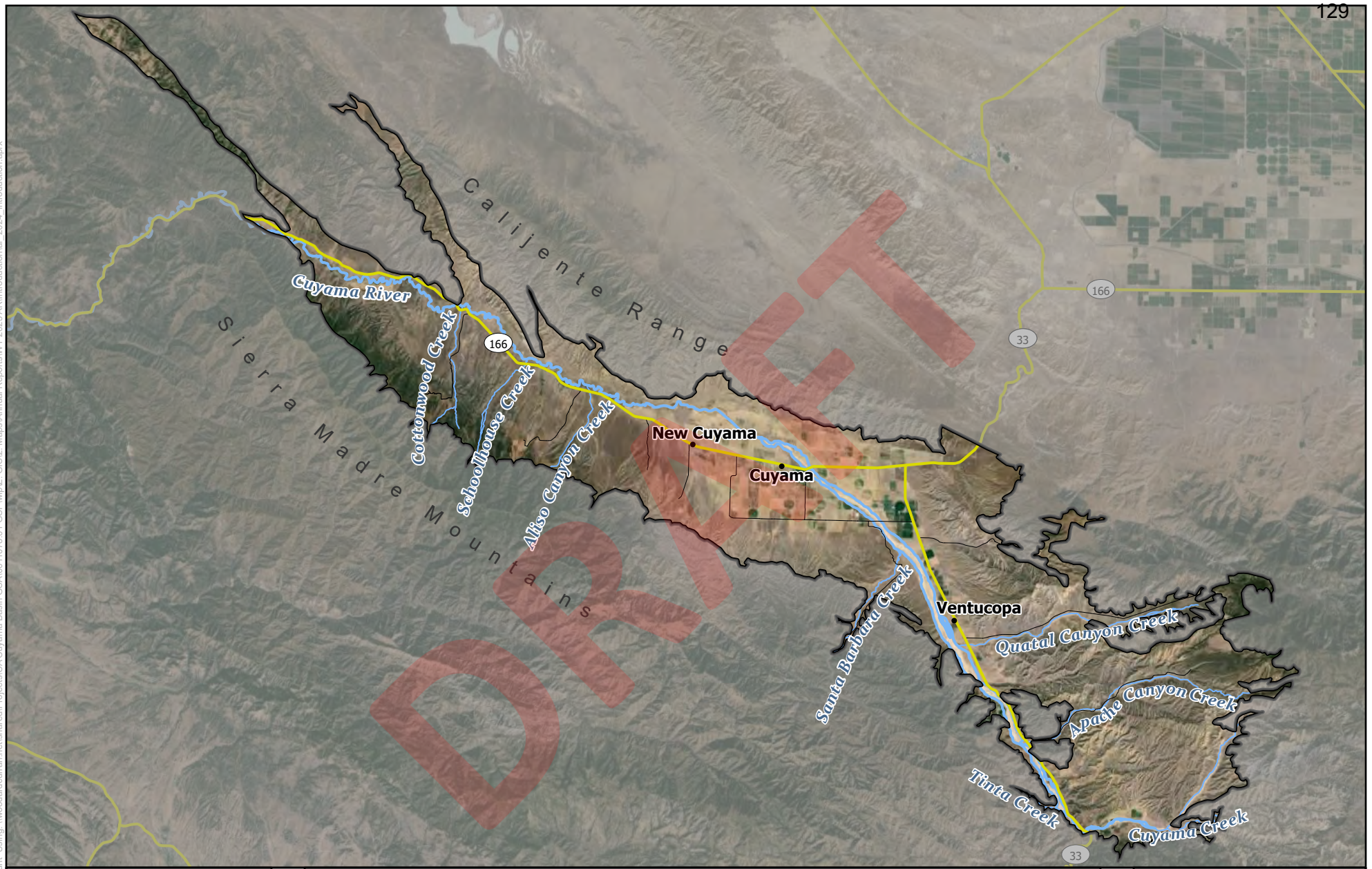
**Figure 1-2** shows the CBGSA boundary. The CBGSA boundary covers all of the Cuyama Valley Groundwater Basin.

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<sup>2</sup> The 2003 version of Bulletin 118 section on the Cuyama Valley Groundwater Basin incorrectly stated that the Basin area is 230 square miles. The estimate of 378 square miles shown here and in the GSP is consistent with the mapping shown on DWR's GSA Map Viewer.



Figure Exported: 2/20/2024, By: Dhlunt, Using: \\woodardcurran.net\shared\Projects\CA\Cuyama Basin\_GSA0011078.01\_GSP\MapZ\_GIS2\_Maps\Annual Reports\WY 2023 AR\Introduction\ar\_2024\_Introduction.aprx



**Figure 1-1: Groundwater Sustainability Plan Area**

**Cuyama Valley Groundwater Basin**

**Legend**

- Cuyama Basin
- Creek
- Local Road
- Cuyama River
- Highway
- Town



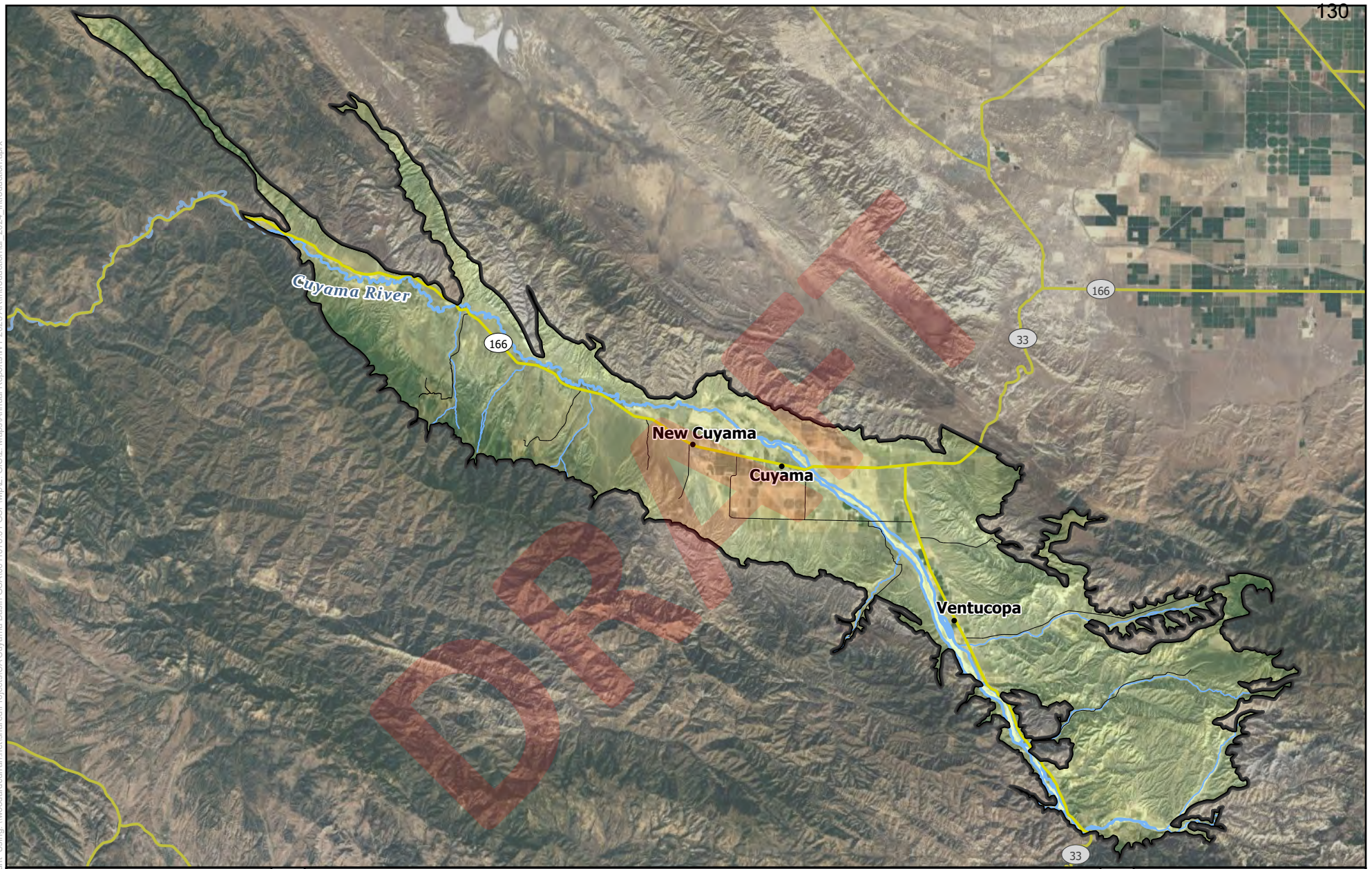
0 1.75 3.5 7 Miles

Map Created: February 2024

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**Figure 1-2: Groundwater Sustainability Agency Boundary**

**Cuyama Valley Groundwater Basin**

<b>Legend</b>	Cuyama Basin	Highway	Cuyama Basin GSA
	Cuyama River	Local Road	
	Creek	Town	

0 1.75 3.5 7 Miles

Map Created: February 2024

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## Section 2. Groundwater Levels

§356.2 (b)(1)	Groundwater elevation data from monitoring wells identified in the monitoring network shall be analyzed and displayed as follows:
§356.2 (b)(1)(A)	Groundwater elevation contour maps for each principal aquifer in the basin illustrating, at a minimum, the seasonal high and seasonal low groundwater conditions.
§356.2 (b)(1)(B)	Hydrographs of groundwater elevations and water year type using historical data to the greatest extent available, including from January 1, 2015, to current reporting year.

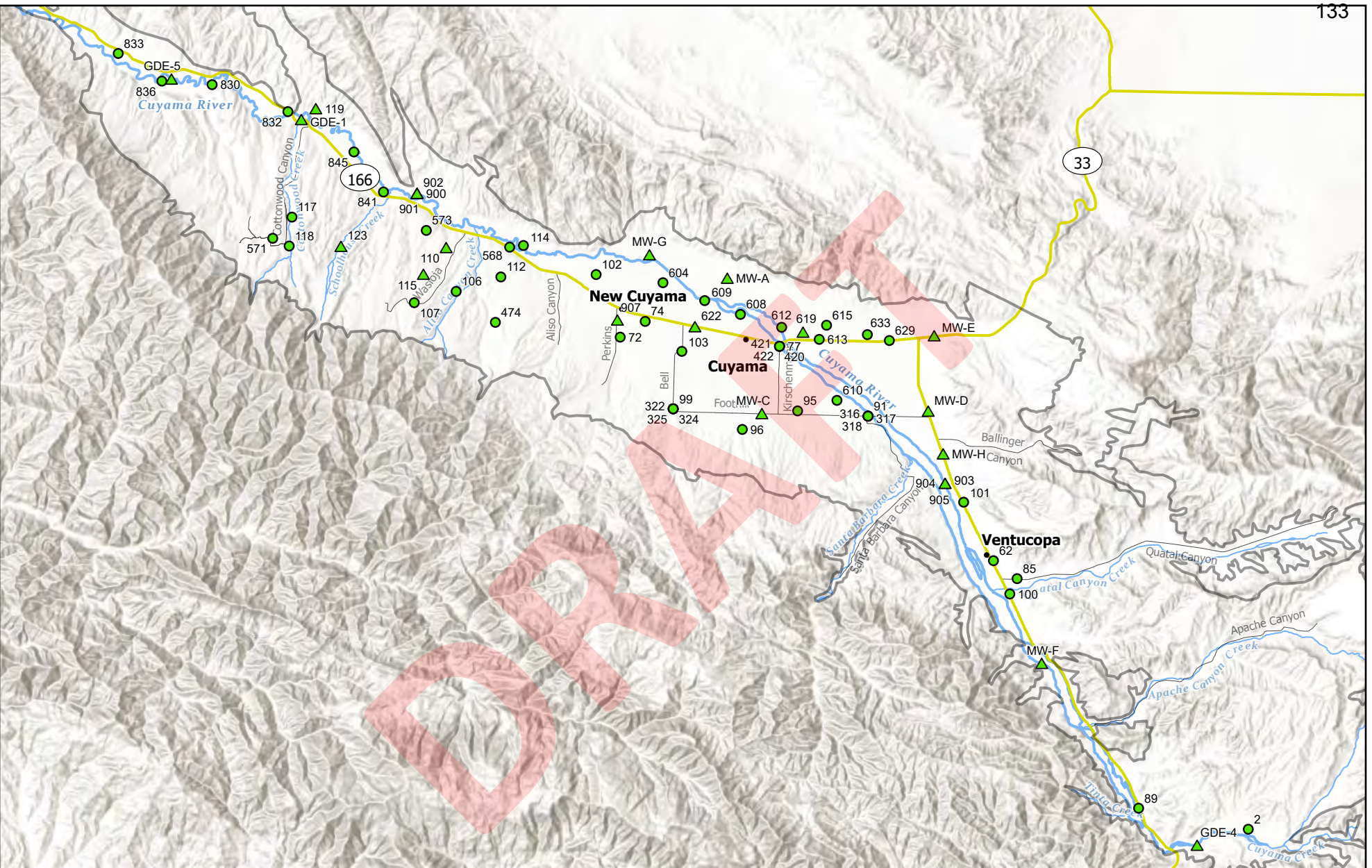
### 2.1 Groundwater Levels Representative Monitoring Network

As required by DWR’s SGMA regulations, a monitoring network and representative monitoring network were identified in the Cuyama Basin GSP utilizing existing wells. The current groundwater levels representative monitoring network that was approved by the CBGSA Board is shown on **Figure 2-1**. The Cuyama Basin consists of a single principal aquifer, and water levels in monitoring network wells are considered representative of conditions in that aquifer. The objective of the representative monitoring network is to detect undesirable results in the Basin related to groundwater levels using the sustainability thresholds described in the GSP. Other related objectives of the monitoring network are defined via the SGMA regulations as follows:

- Demonstrate progress toward achieving measurable objectives described in the GSP.
- Monitor impacts to the beneficial uses or users of groundwater.
- Monitor changes in groundwater conditions relative to measurable objectives and minimum thresholds.
- Quantify annual changes in water budget components.
- Monitoring that has occurred on the groundwater level monitoring network since the development of the Cuyama Basin GSP is included in this Annual Report. Collected groundwater level data has been analyzed to prepare contour maps and updated hydrographs, which are presented in the following sections.

In advance of the 2025 GSP Update, the CBGSA Board voted to modify the representative monitoring network to remove two wells for which the CBGSA has not been able to get a landowner agreement. In addition, CBGSA Board approved updated minimum thresholds and measurable objectives that take into consideration beneficial uses and users of groundwater and data collected over the last several years of Basin implementation. These changes have been reflected in the 2025 GSP update and in this Annual Report.

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**Figure 2-1: Updated Groundwater Level Monitoring Network**

**Cuyama Valley Groundwater Basin**

<b>Legend</b>	Network Well	Highway	Cuyama River
	Representative Monitoring	Local Road	Creek
	Non-representative Monitoring	Town	Cuyama Basin

0 1.25 2.5 5 Miles

Map Created: December 2023

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## 2.2 Groundwater Contour Maps

The Updated 2025 GSP submitted in January, 2025, included contour maps up through the spring of 2024. The previous Annual Reports included contour maps for spring and fall of 2019 through 2023. For this Annual Report, analysis was conducted to incorporate data through October 2024 that was collected by the CBGSA and local landowners. Data was then added to the Data Management System (DMS) and processed to analyze the current groundwater conditions by creating seasonal groundwater contour/raster maps for the spring and fall of 2024 and hydrographs of Basin monitoring wells.

A contour map shows changes in groundwater elevations by interpolating groundwater elevations between monitoring sites. The elevations are shown on the map with the use of a contour line, which indicates that at all locations that line is drawn, the line represents groundwater at the elevation indicated. There are two versions of contour maps used in this section: one that shows the elevation of groundwater above mean sea level, which is useful because it can be used to identify the horizontal gradients of groundwater, and one that shows contours of depth to water, the distance from the ground surface to groundwater, which is useful because it can identify areas of shallow or deep groundwater.

Analysts prepared groundwater contour maps under the supervision of a Certified Hydrogeologist in the State of California for both groundwater elevation and depth to water for both spring and fall of 2024.

Each contour map is contoured at a 50-foot contour interval, with contour elevations indicated in white numeric label. The groundwater contours were also based on assumptions in order to accumulate enough data points to generate useful contour maps. Assumptions are as follows:

- Measurements from wells of different depths are representative of conditions at that location and there are no significant known vertical gradients. Due to the limited spatial amount of monitoring points, data from wells of a wide variety of depths were used to generate the contours.
- Measurements collected by the CBGSA monitoring program in April 2024 were used to develop the spring contours and in October 2024 to develop the fall contours. It is assumed that these measurements are representative of conditions during the spring or fall season, and conditions have not changed substantially from the time of the earliest measurement used to the latest.

These assumptions generate contours that are useful at the planning level for understanding groundwater levels across the Basin, and to identify general horizontal gradients and regional groundwater level trends. The contour maps are not indicative of exact values across the Basin because groundwater contour maps approximate conditions between measurement points, and do not account for topography. Therefore, a well on a ridge may be farther from groundwater than one in a canyon, and the contour map will not reflect that level of detail.

**Figure 2-2** shows groundwater elevation contours for Spring of 2024. Based on data that was collected by local landowners and the CBGSA. The contours developed using the available data show two general trends in the Basin. First, in most of the Basin, groundwater generally reflects the topography of the Basin. For example, groundwater elevations decrease moving from the highest portions of the Valley in the Southeastern portion of the Basin towards the central portion, and groundwater also travels down slope in a northern direction off of the southern foothills towards the Cuyama River. The second trend and potential exception to the first, is the central portion of the Basin where there is a clear depression and deviation from the topography (more clearly seen in the following figure). Groundwater levels near the town of Cuyama and slightly towards the east are much deeper and do not match the surface topography. There is also a greater decline in groundwater elevations between the Ventucopa area and the central portion of the Basin.

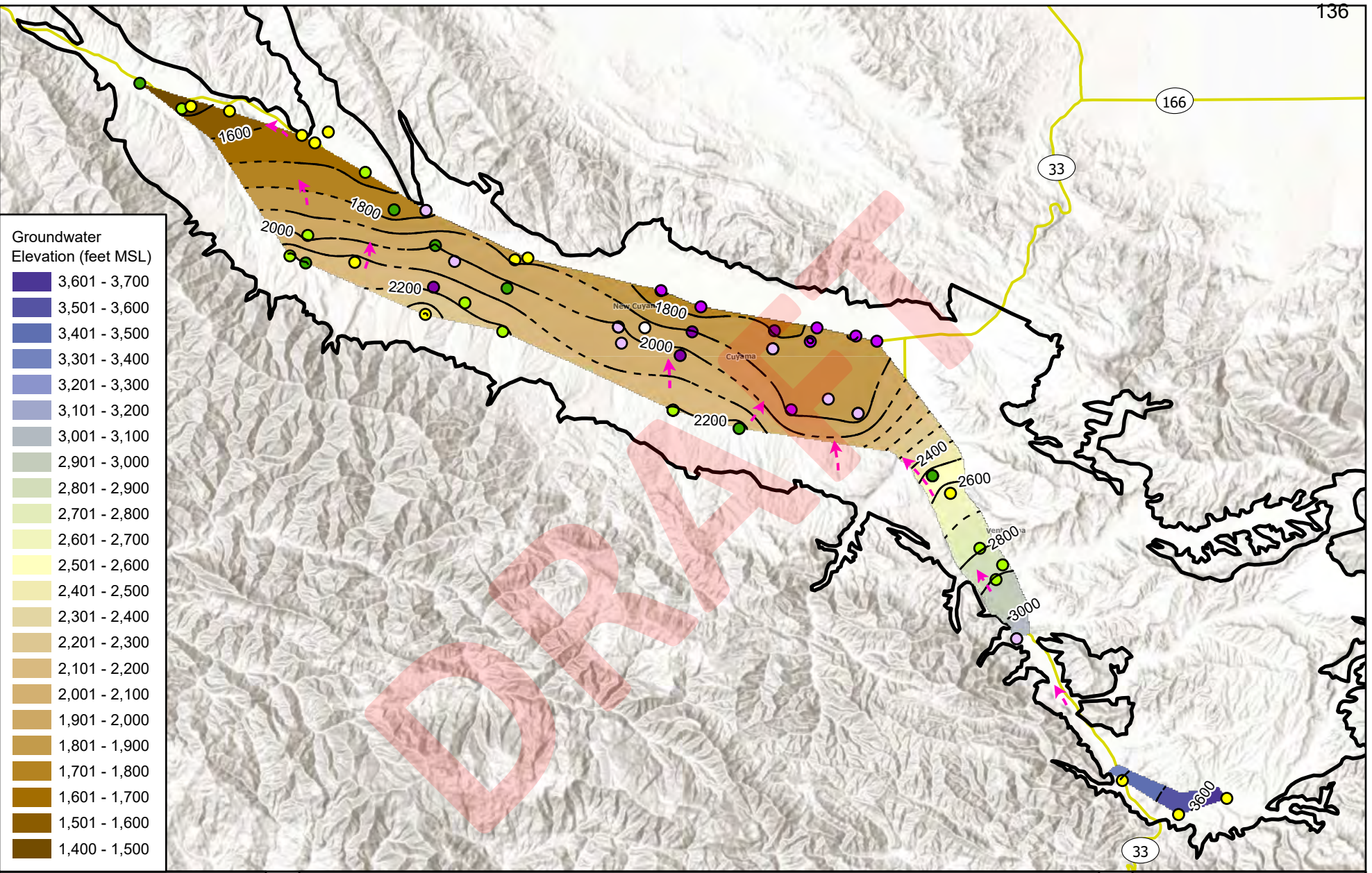
**Figure 2-3** shows the depth to groundwater contours for Spring 2024 and more clearly shows a depression in the central portion of the Basin greater than 600 ft below ground surface. Groundwater levels then increase toward the west reaching depths of less than 100 ft in the western portion of the Basin. These levels align with trends seen in previous contour maps provided in previous Annual Reports.

**Figure 2-4** shows the groundwater elevation contours for Fall of 2024. Groundwater elevations show a depression in the central portion of the Basin and a steep gradient between the central portion of the Basin and the Ventucopa area, which is consistent with contour maps for 2015 through 2023 conditions and previous Annual Reports. Contours indicate a groundwater flow down the Basin from east to west, with a decrease in gradient through the central portion of the Basin.

**Figure 2-5** shows the depth to groundwater contours for the Fall of 2024. Depth to water contours indicate a depression in the central portion of the Basin, and a steep gradient between the central portion of the Basin and the Ventucopa area, which is consistent with contour maps for 2015 through 2023 conditions and previous Annual Reports.

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**Groundwater Elevation (feet MSL)**

3,601 - 3,700
3,501 - 3,600
3,401 - 3,500
3,301 - 3,400
3,201 - 3,300
3,101 - 3,200
3,001 - 3,100
2,901 - 3,000
2,801 - 2,900
2,701 - 2,800
2,601 - 2,700
2,501 - 2,600
2,401 - 2,500
2,301 - 2,400
2,201 - 2,300
2,101 - 2,200
2,001 - 2,100
1,901 - 2,000
1,801 - 1,900
1,701 - 1,800
1,601 - 1,700
1,501 - 1,600
1,400 - 1,500

**Figure 2-02: Spring 2024 Groundwater Elevation**  
**Cuyama Valley Groundwater Basin**

Legend

— Groundwater Elevation Contour	— Highway	Well Depth (feet)	● 401 - 600
- - - Approximate Contour	□ Cuyama Basin	○ Unknown	● 601 - 800
- - > Conceptual Flowline		● 0 - 200	● 801 - 1000
		● 201 - 400	● 1001 - 1200

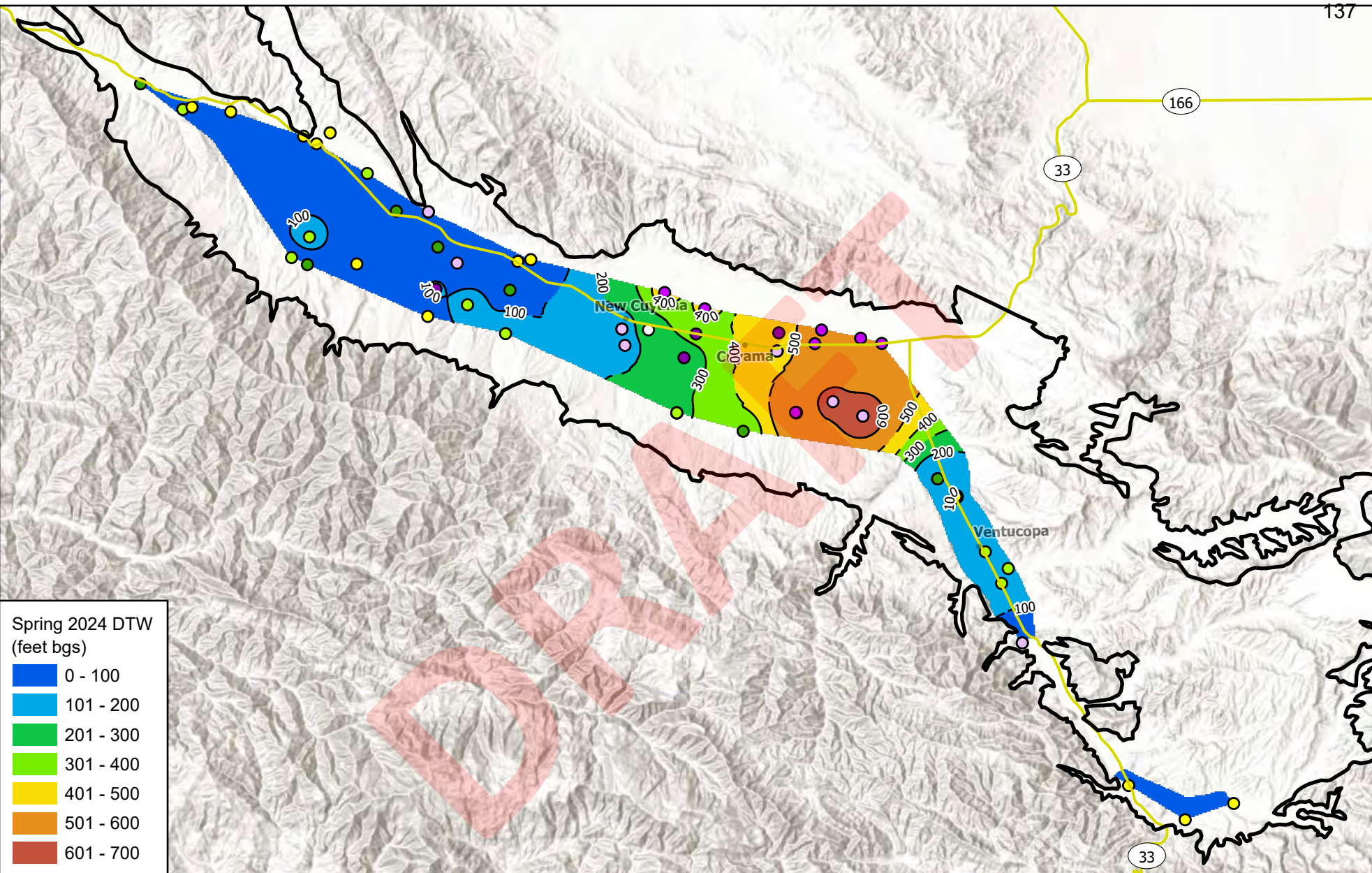
Map navigation and metadata:

- North arrow pointing up.
- Scale bar: 0, 1.25, 2.5, 5 Miles.
- Map Created: February 2025.
- Logos for Woodard & Curran and Cuyama Basin Groundwater Sustainability Agency.

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**Spring 2024 DTW (feet bgs)**

- 0 - 100
- 101 - 200
- 201 - 300
- 301 - 400
- 401 - 500
- 501 - 600
- 601 - 700

**Figure 2-03: Spring 2024 Depth to Water**

**Cuyama Valley Groundwater Basin**

<b>Legend</b>	Depth to Water Contour	Highway	<b>Well Depth</b>	601 - 800
	Approximate Contour	Local Road	Unknown	801 - 1000
	Town	Cuyama Basin	0 - 200	1001 - 1200
			201 - 400	
			401 - 600	

**Woodard & Curran**

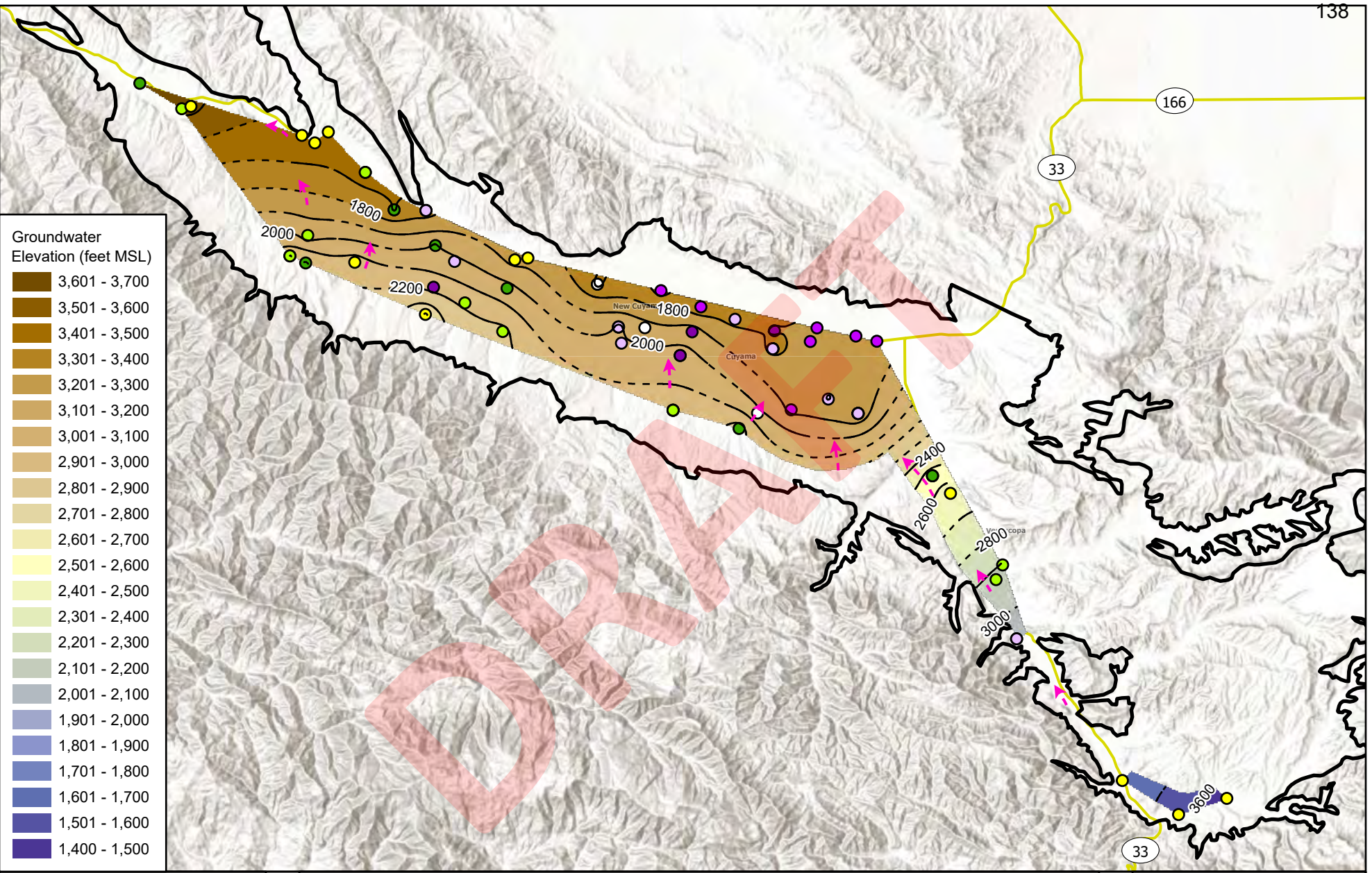
0 1.25 2.5 5 Miles

Map Created: January 2025

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**Groundwater Elevation (feet MSL)**

3,601 - 3,700
3,501 - 3,600
3,401 - 3,500
3,301 - 3,400
3,201 - 3,300
3,101 - 3,200
3,001 - 3,100
2,901 - 3,000
2,801 - 2,900
2,701 - 2,800
2,601 - 2,700
2,501 - 2,600
2,401 - 2,500
2,301 - 2,400
2,201 - 2,300
2,101 - 2,200
2,001 - 2,100
1,901 - 2,000
1,801 - 1,900
1,701 - 1,800
1,601 - 1,700
1,501 - 1,600
1,400 - 1,500

**Figure 2-04: Fall 2024 Groundwater Elevation**

**Cuyama Valley Groundwater Basin**

**Legend**

— Groundwater Elevation Contour	— Highway	Well Depth (feet)	● 401 - 600
- - - Approximate Contour	□ Cuyama Basin	○ Unknown	● 601 - 800
- -> Conceptual Flowline		● 0 - 200	● 801 - 1000
		● 201 - 400	● 1001 - 1200



Woodard & Curran

CUYAMA BASIN  
GROUNDWATER SUSTAINABILITY AGENCY

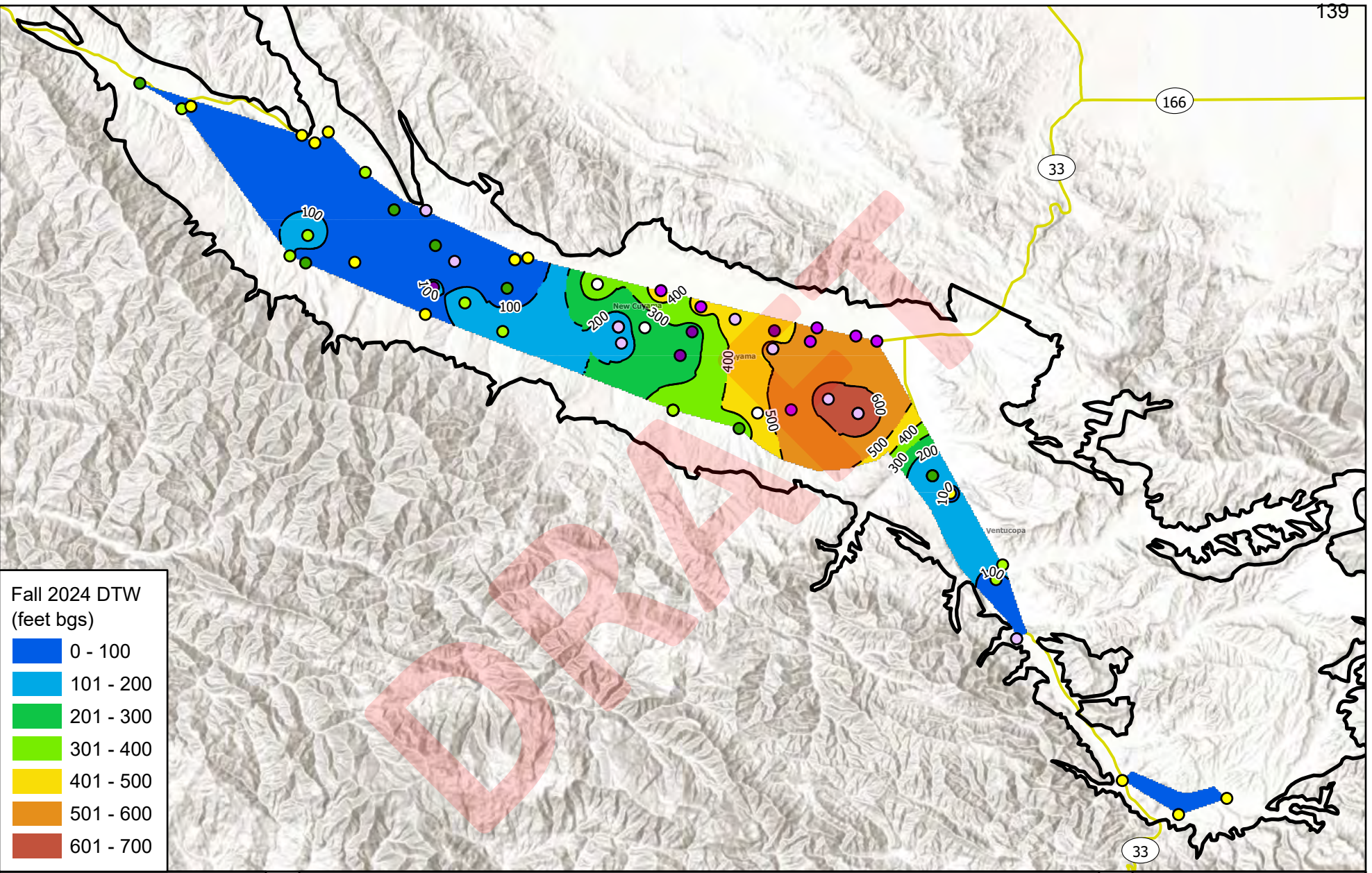
0 1.25 2.5 5 Miles

Map Created: February 2025

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**Fall 2024 DTW (feet bgs)**

- 0 - 100
- 101 - 200
- 201 - 300
- 301 - 400
- 401 - 500
- 501 - 600
- 601 - 700

**Figure 2-05: Fall 2024 Depth to Water**  
Cuyama Valley Groundwater Basin

<b>Legend</b>	Depth to Water Contour	Highway	<b>Well Depth</b>	601 - 800
	Approximate Contour	Local Road	Unknown	801 - 1000
	Town	Cuyama Basin	0 - 200	1001 - 1200
			201 - 400	
			401 - 600	

0 1.25 2.5 5 Miles

Map Created: February 2025

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## 2.3 Hydrographs

Groundwater hydrographs were developed for each representative monitoring network well to provide indicators of groundwater trends throughout the Basin. Measurements from each well with historical monitoring data were compiled into one hydrograph for each well. A selection of wells from each threshold region are provided below, while hydrographs for every groundwater level representative network well are presented in Appendix A.

In many cases, changes in historical groundwater conditions at particular wells have been influenced by climactic patterns in the Basin. Historical precipitation is highly variable, with several relatively wet years and some multi-year droughts.

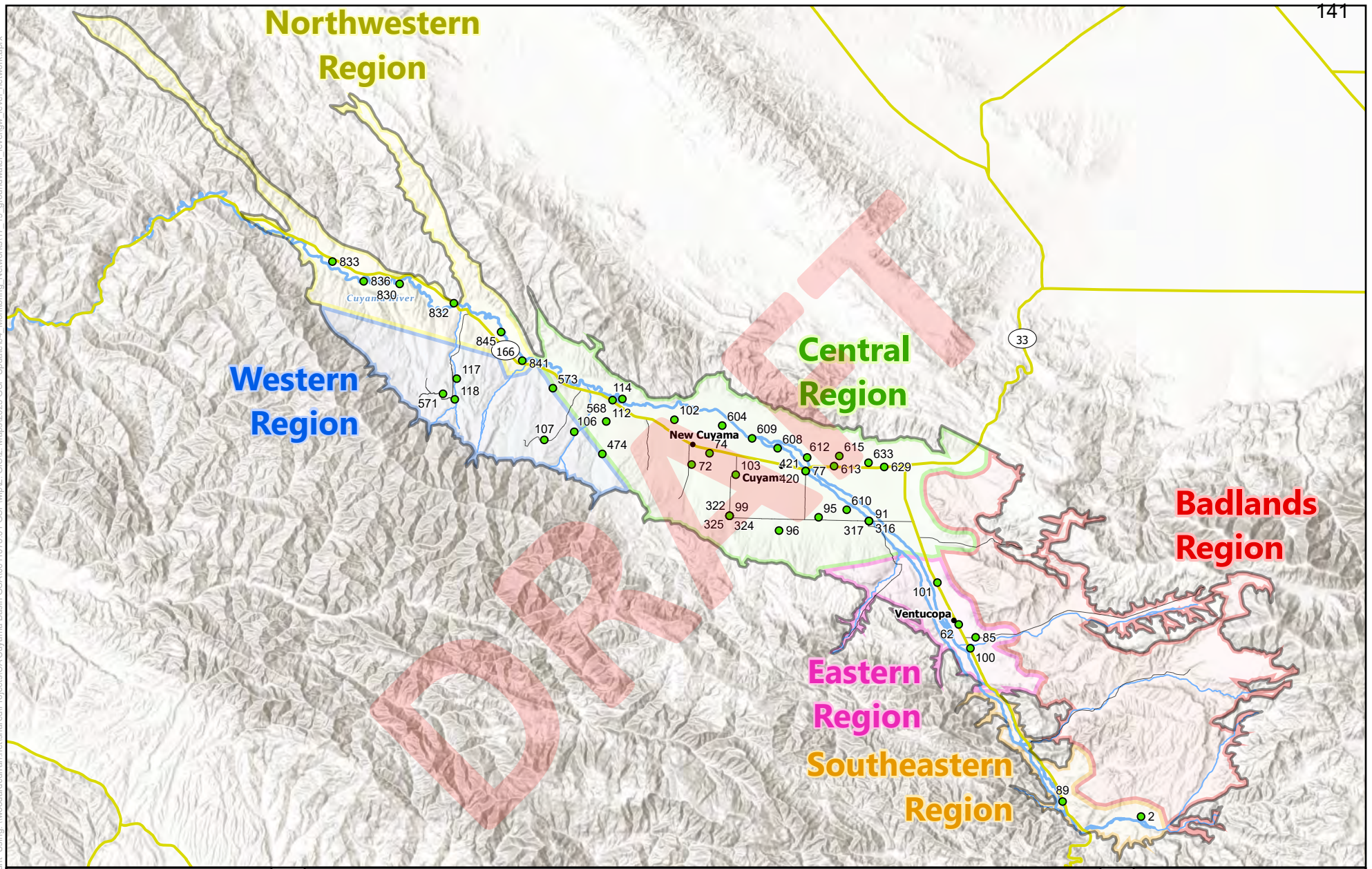
Groundwater conditions generally vary in different parts of the Basin. To provide a comparative analysis general groundwater trends are provided in **Table 2-1** and are accompanied by hydrographs for an example well in each threshold region. A map of threshold regions is provided in **Figure 2-6**, which also shows the locations of example wells used in each threshold region.

**Table 2-1: Groundwater Trends by Threshold Regions**

Threshold Region	Groundwater Trend	Example Well(s)
Northwestern Region	An upward trend influenced by seasonal fluctuations. This is expected as a wet winter brought recharge to this area. Although there are recent changes in land use that have begun to pump groundwater, levels have risen over the past water year. Levels are approximately 100 ft above the Measurable Objective.	841 ( <b>Figure 2-7</b> )
Western Region	Levels in this region showed a significant recovery due to previous wet water years to within 40 feet of ground surface. Current levels are approximately 10 ft above the Measurable Objective.	571 ( <b>Figure 2-8</b> )
Central Region	Levels have historically had a steady downward trend with some seasonal fluctuations. This pattern remains for some wells but with slight bumps correlated with the wet year (Well 91) with trends continuing downward and, in some cases, levels surpassing minimum thresholds. There is some indication of recovery in some wells such as Well 74 where groundwater levels improved and then continued the downward trend again.	74 and 91 ( <b>Figure 2-9 &amp; Figure 2-10</b> )
Eastern Region	This region has seen an overall decline over several decades. However, with the wet conditions, groundwater trends appear to be improving consistently and are far above the MO.	62 ( <b>Figure 2-11</b> )
Southeastern Region	Levels in this relatively small region decreased slightly during the last drought but have recovered over the past few years and are well above the Measurable Objective.	89 ( <b>Figure 2-12</b> )



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**Figure 2-6: Representative Groundwater Monitoring Network and Threshold Regions**

**Cuyama Valley Groundwater Basin**

<b>Legend</b>	Representative Well	Eastern Region	Highway	Creek
	<b>Threshold Regions</b>	Northwestern Region	Local Road	Cuyama River
	Badlands Region	Southeastern Region	Town	Cuyama Basin
	Central Region	Western Region		

0 1.75 3.5 7 Miles

Map Created: February 2024

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Figure 2-7: Example Well Hydrographs – Northwestern Region

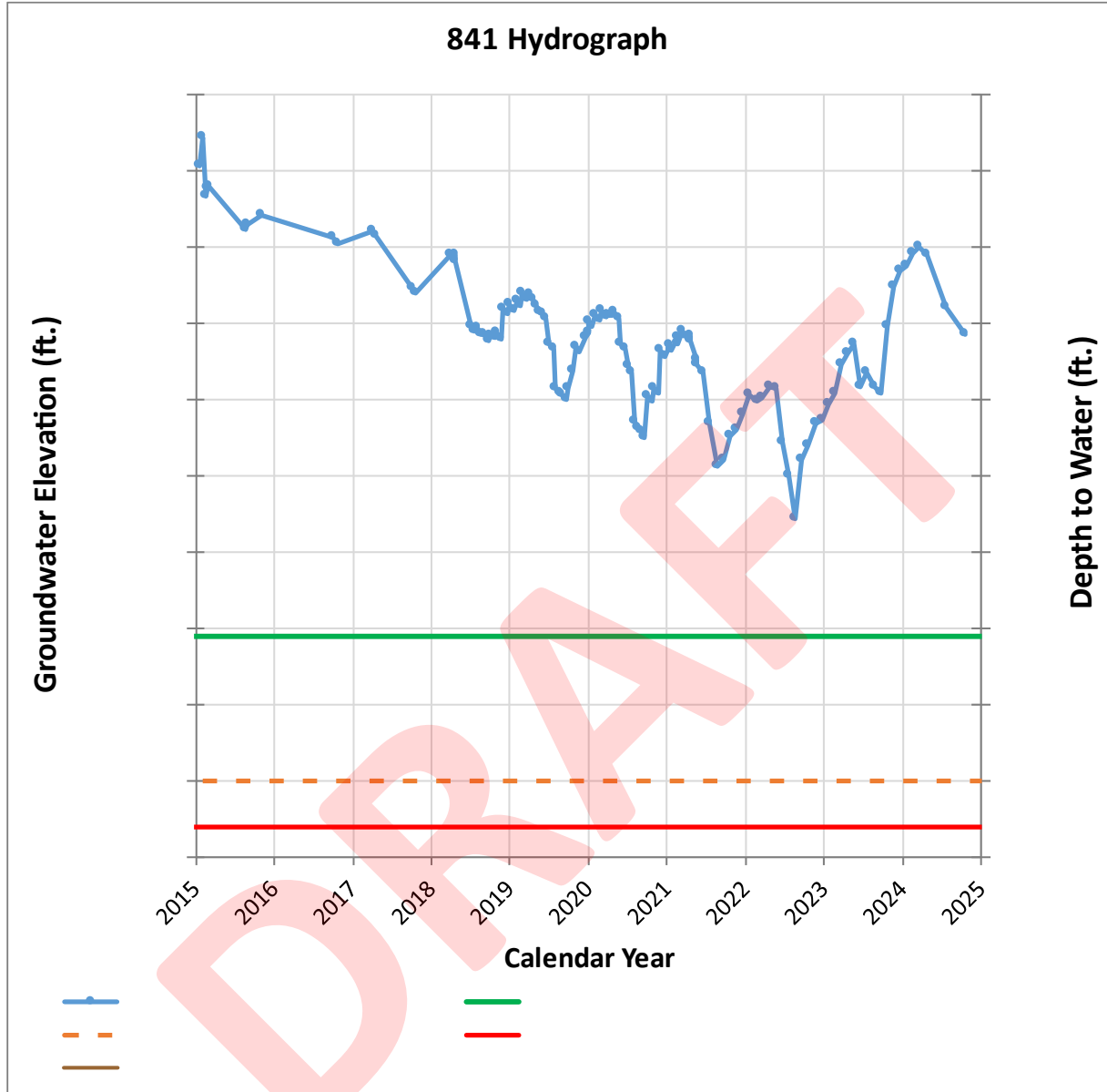




Figure 2-8: Example Well Hydrographs – Western Region

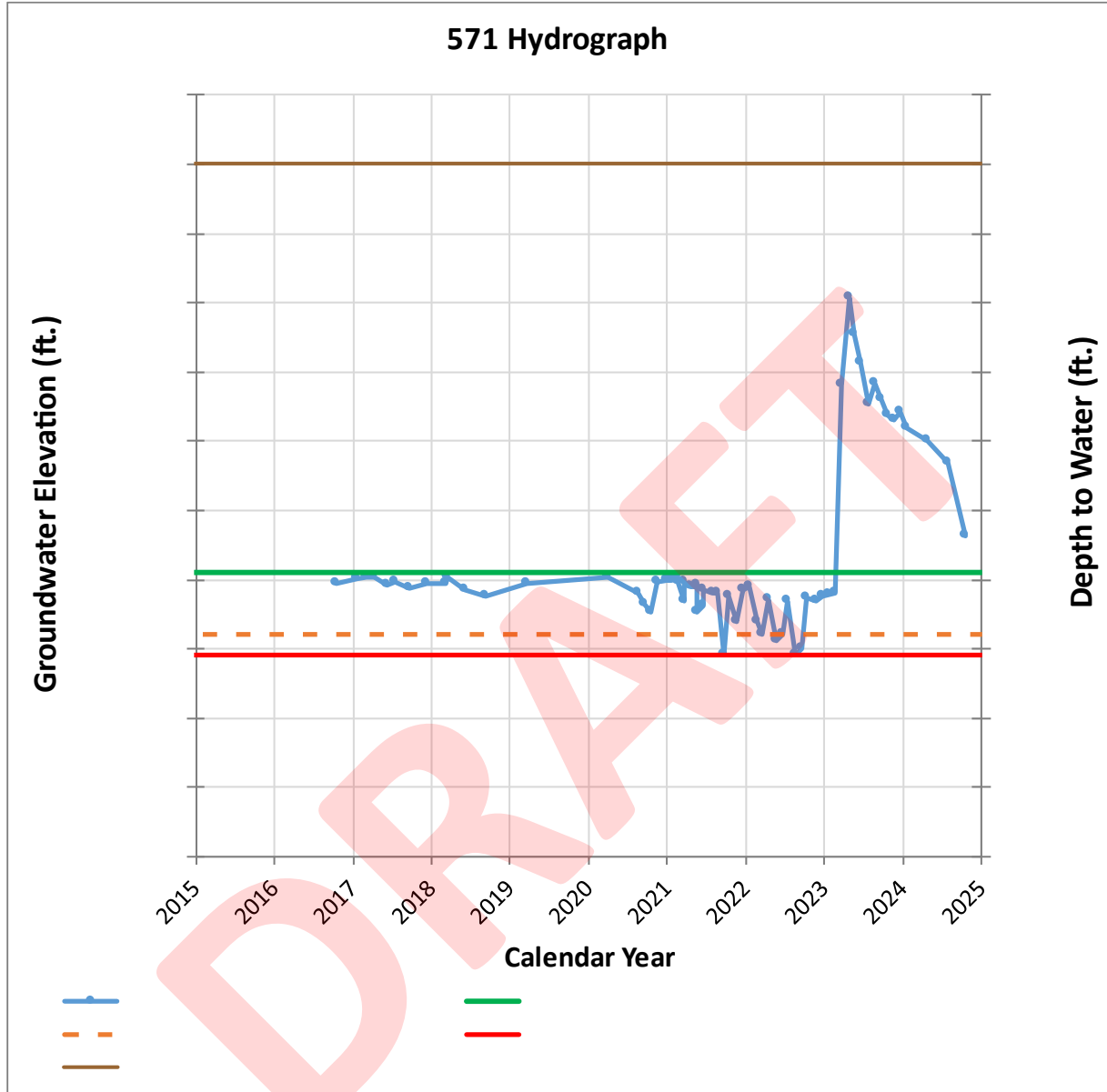


Figure 2-9: Example Well Hydrographs – Central Region

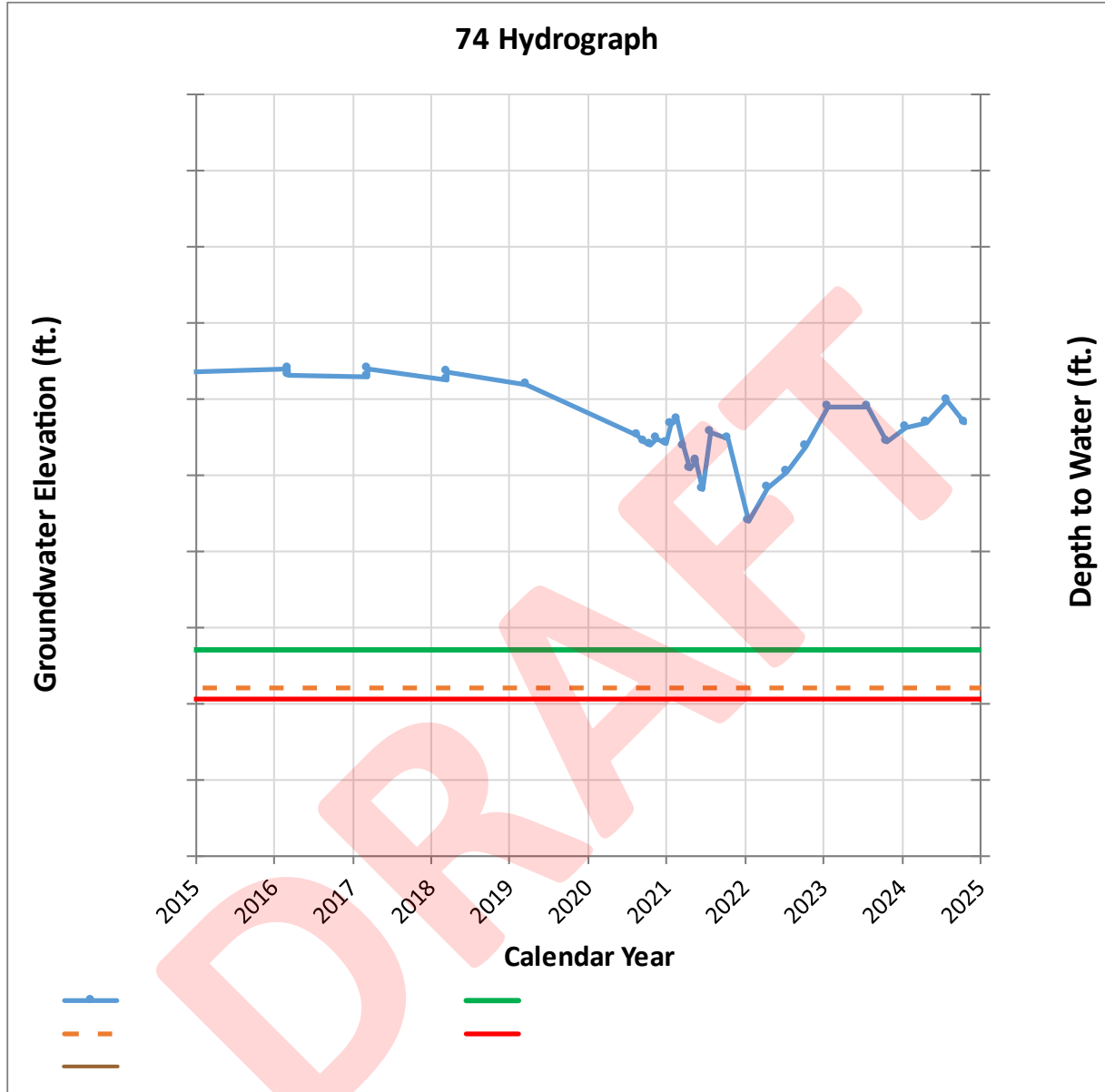


Figure 2-10: Example Well Hydrographs – Central Region

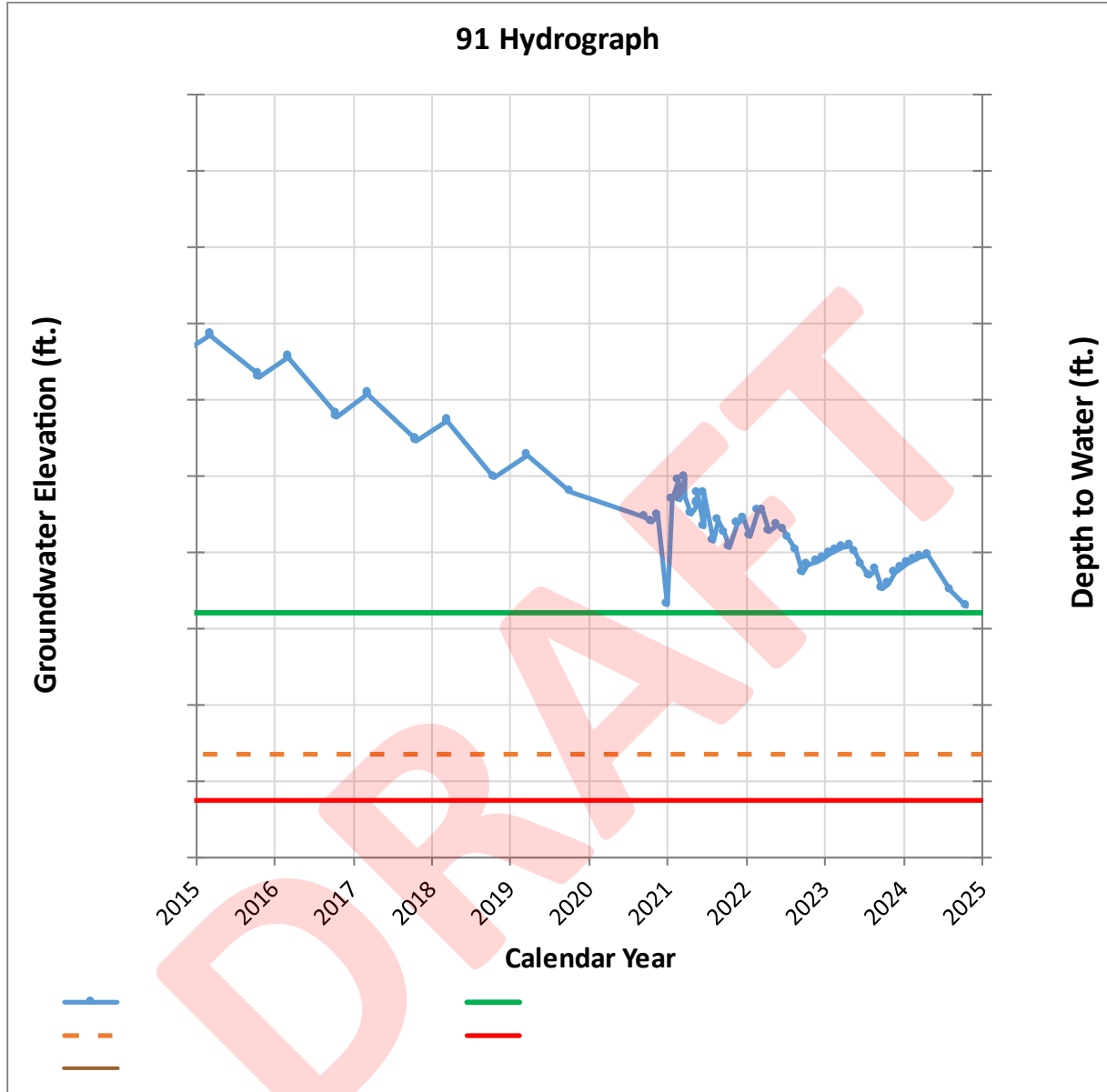


Figure 2-11: Example Well Hydrographs – Eastern Region

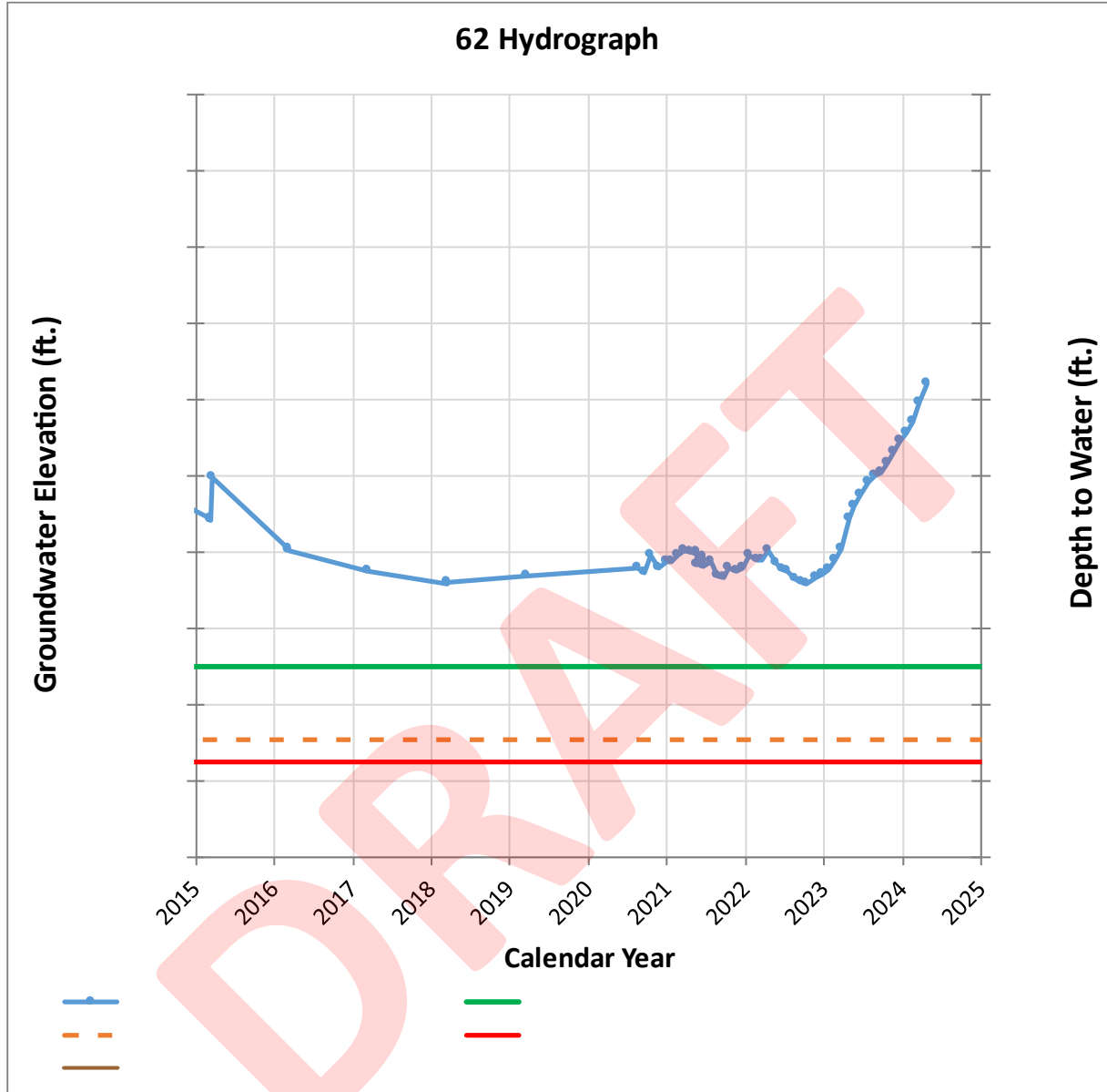
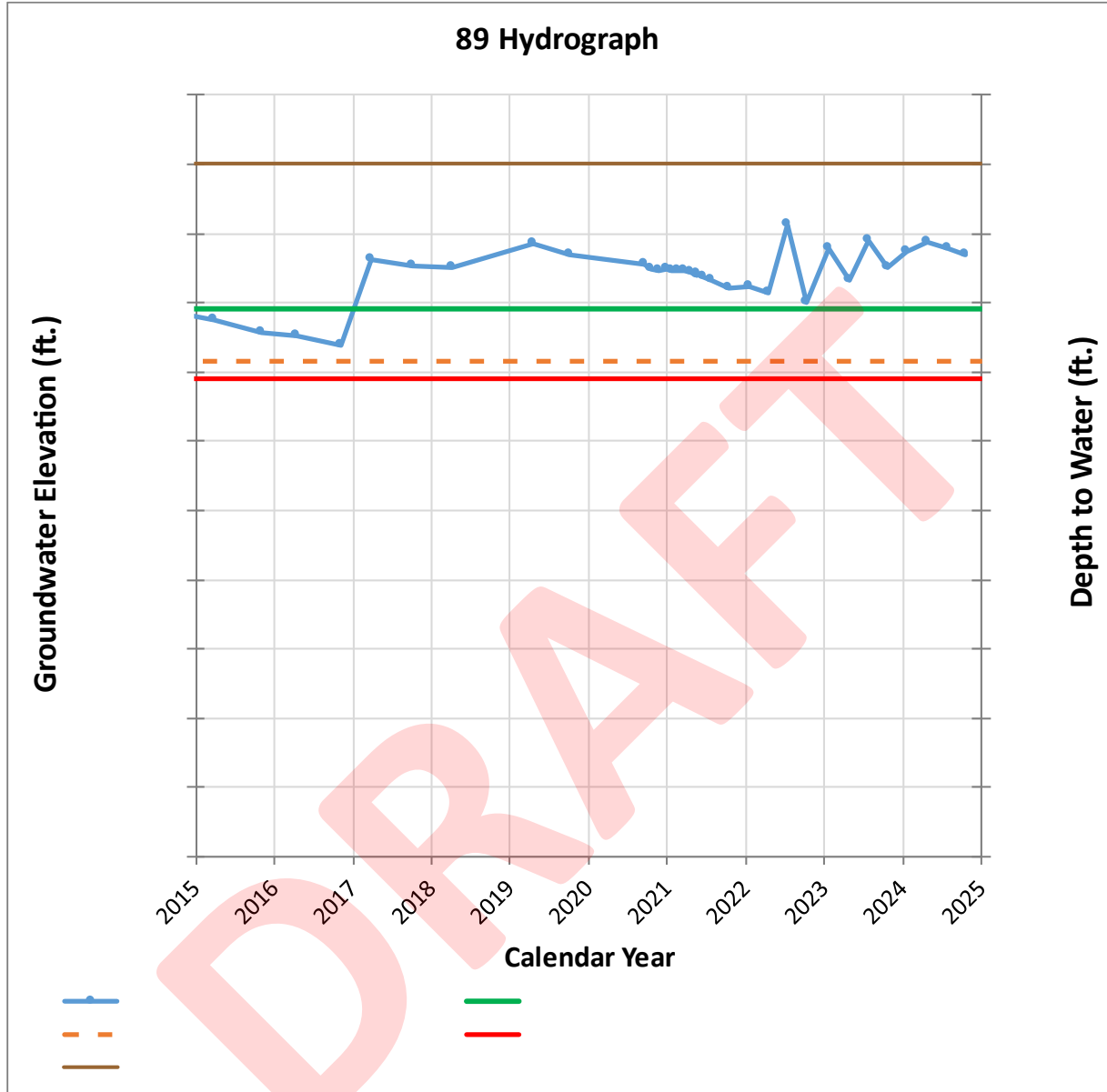




Figure 2-12: Example Well Hydrographs – Southeastern Region



## Section 3. Water Use

§356.2 (b) (2)	Groundwater extraction for the preceding water year. Data shall be collected using the best available measurement methods and shall be presented in a table that summarizes groundwater extractions by water use sector, and identifies the method of measurement (direct or estimate) and accuracy of measurements, and a map that illustrates the general location and volume of groundwater extractions.
§356.2 (b) (3)	Surface water supply used or available for use, for groundwater recharge or in-lieu use shall be reported based on quantitative data that describes the annual volume and sources for the preceding water year.
§356.2 (b) (4)	Total water use shall be collected using the best available measurement methods and shall be reported in a table that summarizes total water use by water use sector, water source type, and identifies the method of measurement (direct or estimate) and accuracy of measurements. Existing water use data from the most recent Urban Water Management Plans or Agricultural Water Management Plans within the basin may be used, as long as the data are reported by water year.

### 3.1 Groundwater Extraction

Water budgets in the Cuyama Basin GSP were developed using the Cuyama Basin Water Resources Model (CBWRM) model, which is a fully integrated surface and groundwater flow model covering the Basin. The CBWRM was used to develop a historical water budget that evaluated the availability and reliability of past surface water supply deliveries, aquifer response to water supply, and demand trends relative to water year type. For the 2020 GSP, the CBWRM was used to develop water budget estimates for the hydrologic period of 1998 through 2017. An update of the model, including re-calibration based on recently available data, was completed for the 2025 GSP Update and is based on the best available data and information as of September 2023. An assessment of model uncertainty included in the GSP estimated an error range in overall model results of about +/- 10%. It is expected that the model will be refined in the future as improved and updated monitoring information becomes available for the Basin. For the current Annual Report, the CBWRM model was extended to include the 2024 water year, utilizing updated land use, temperature, and precipitation<sup>3</sup> data from those years.

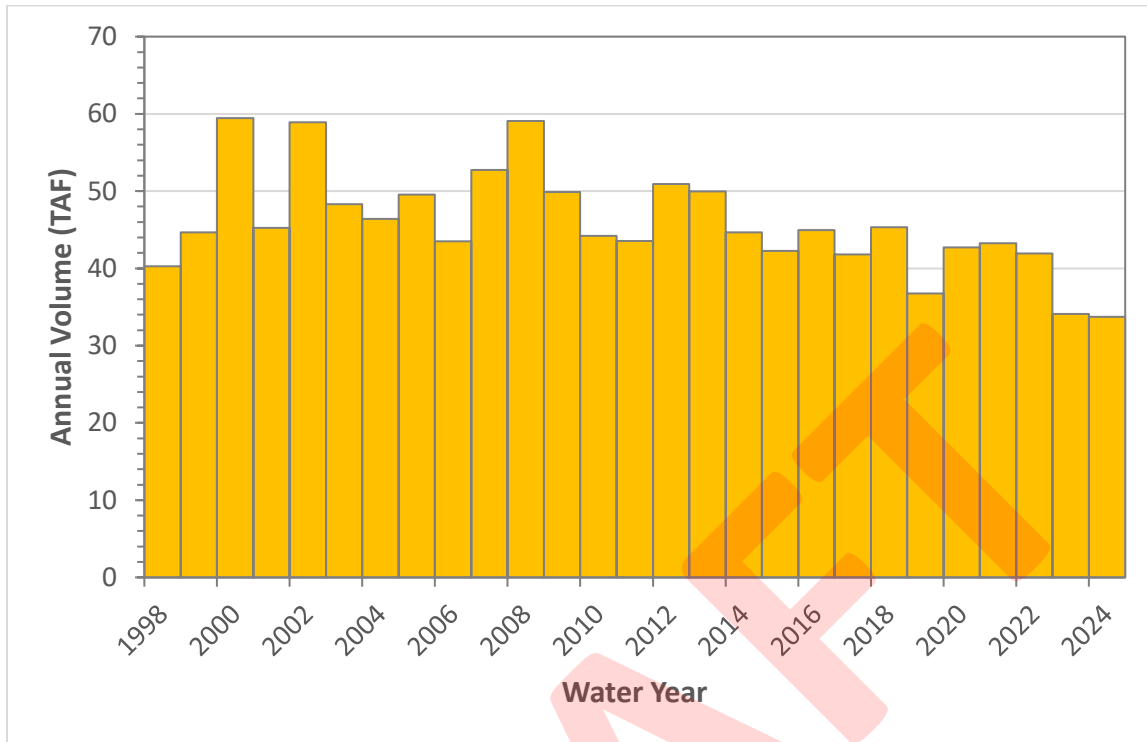
**Figure 3-1** shows the annual time series of groundwater pumping for the water years 1998 through 2024.<sup>4</sup> The CBWRM estimates a total groundwater extraction amount of 33,700 AF in the Cuyama Basin in the 2024 water year. This reflects a decrease of about 400 AF as compared to 2023. Almost all groundwater extraction in the Basin is for agriculture use. There is approximately 300 AF of domestic use in each year, with the remainder in each year being for agricultural use.

The total pumping volume in the basin in water year 2024 was significantly higher than the sustainable yield of 16,800 AF estimated in the GSP. The GSP included a pumping allocations management action to reduce pumping levels to sustainable levels by 2040. See section 7.5.2 for an update on progress made to implement this management action.

<sup>3</sup> Precipitation data provided by PRISM was updated and there are minor changes to some historical (pre-2020) data reflected in the water budget results when compared to previous reports.

<sup>4</sup> Groundwater extraction estimates for years 1998 through 2022 differ from estimates reported in previous Cuyama Basin Annual Reports due to the model update and re-calibration that was performed for the 2025 GSP Update.

**Figure 3-1: Annual Groundwater Extraction in the Cuyama Basin in Water Years 1998-2024**



**Figure 3-2** shows the locations where groundwater is applied in the Basin. The locations of groundwater use have not changed significantly since completion of the GSP.

**Figure 3-3:** Shows the active pumping wells within the Cuyama Basin Boundary.

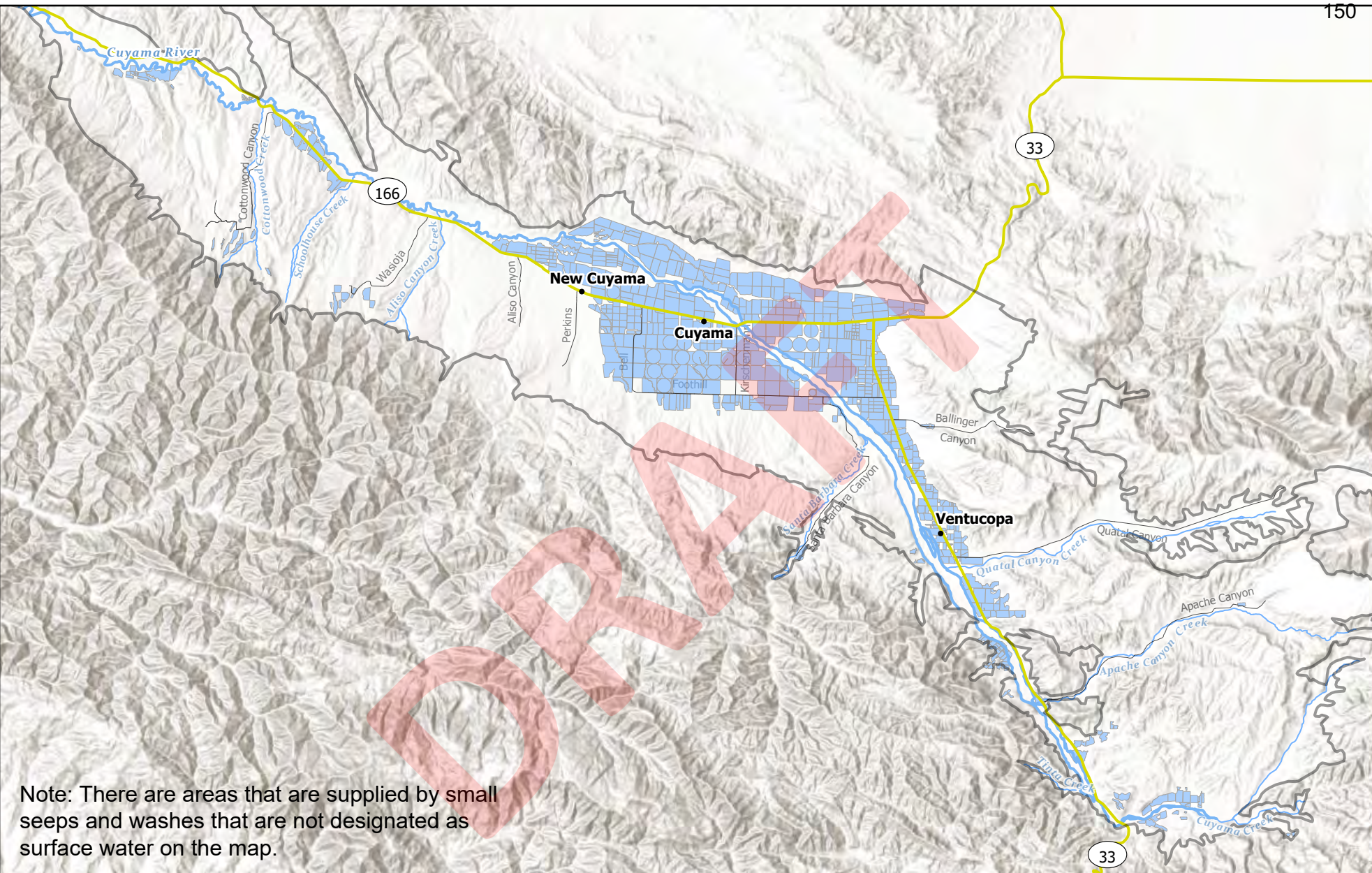
### 3.2 Surface Water Use

Surface water use in the Cuyama Basin was minimal during the reporting period.

### 3.3 Total Water Use

Since there is minimal surface water use in the Cuyama Basin, the total water use equals the groundwater extraction in each year, as shown in Section 3.1.





Note: There are areas that are supplied by small seeps and washes that are not designated as surface water on the map.

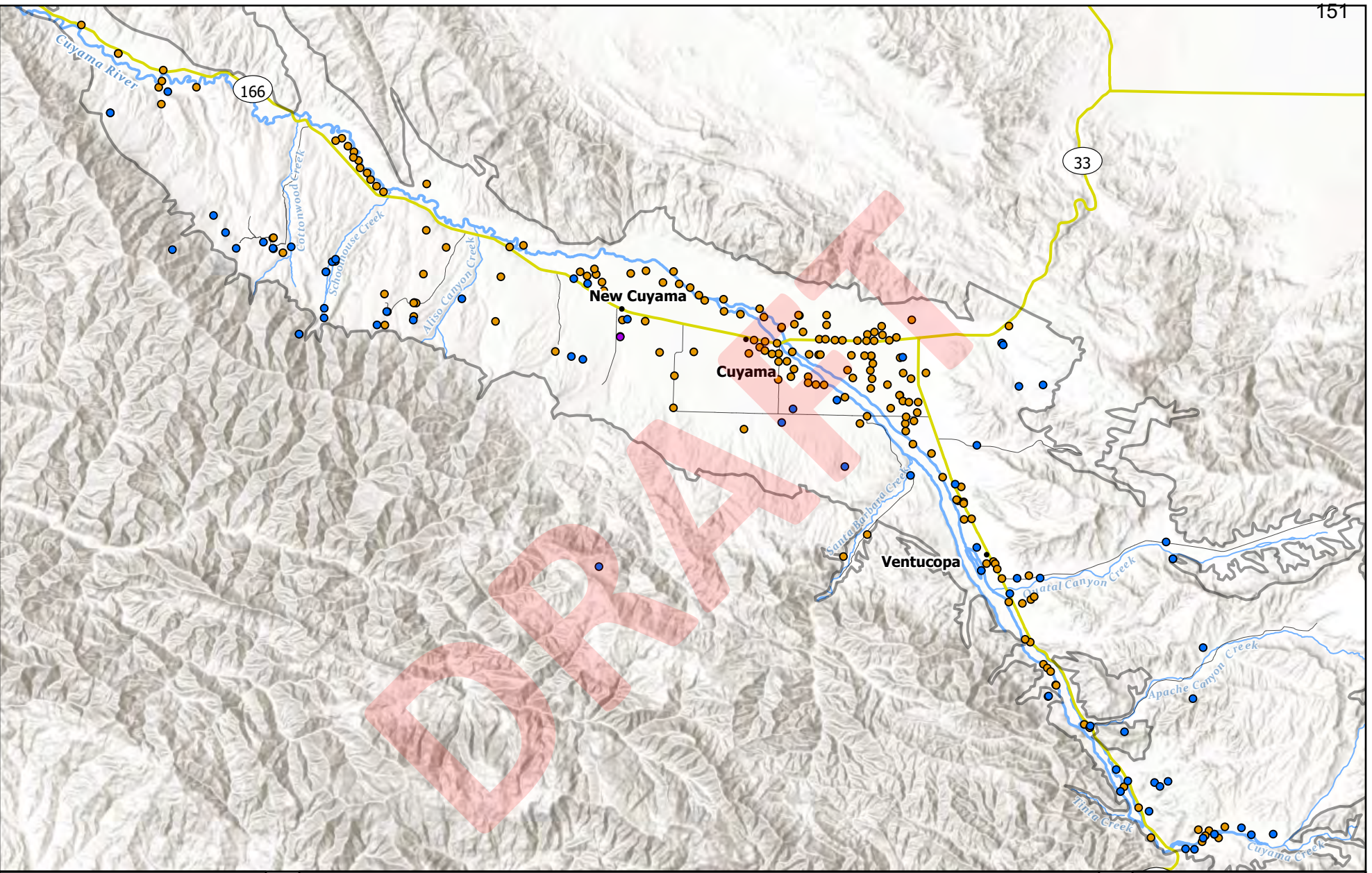
<p><b>Figure 3-2: Water Source for Land Use</b></p> <p><b>Cuyama Valley Groundwater Basin</b></p>	<p><b>Legend</b></p>	<p>Water Source</p> <ul style="list-style-type: none"> <li>Irrigated by Surface Water</li> <li>Irrigated by Surface and Groundwater</li> <li>Irrigated by Groundwater</li> </ul>	<ul style="list-style-type: none"> <li>Highway</li> <li>Local Road</li> <li>Town</li> </ul>	<ul style="list-style-type: none"> <li>Cuyama River</li> <li>Creek</li> <li>Cuyama Basin</li> </ul>	<p>0 1.25 2.5 5 Miles</p> <p>Map Created: December 2023</p>

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**Figure 3-3: Active Wells in Network**  
Cuyama Valley Groundwater Basin

<b>Legend</b>	<b>Well Type</b>	Highway	Cuyama River
	Domestic	Local Road	Creek
	Production	Town	Cuyama Basin
	Public		

0 1.25 2.5 5 Miles

Map Created: December 2023

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## Section 4. Change in Groundwater Storage

§356.2 (b) (5)	Change in groundwater in storage shall include the following:
§356.2 (b) (5) (A)	Change in groundwater in storage maps for each principal aquifer in the basin.
§356.2 (b) (5) (B)	A graph depicting water year type, groundwater use, the annual change in groundwater in storage, and the cumulative change in groundwater in storage for the basin based on historical data to the greatest extent available, including from January 1, 2015, to the current reporting year.

**Figure 4-1** shows contours of the estimated change in groundwater levels in the Cuyama Basin between fall 2023 and fall 2024. The changes shown are based on historical measurements of groundwater elevations in Cuyama Basin representative wells that have recorded measurements in the fall period of each year. These contours are useful at the planning level for understanding groundwater levels across the Basin, and to identify general horizontal gradients and regional groundwater level trends. The contour map is not indicative of exact values across the Basin because groundwater contour maps approximate conditions between measurement points, and do not account for topography.

A quantitative estimate of the annual change in groundwater storage was estimated using the CBWRM model, which was extended to include the 2024 water year as described in the groundwater extraction section above. The CBWRM was used to estimate the full groundwater budget for each year in the Cuyama Basin, which consists of a single principal aquifer. The estimated values for each water budget component in each of the past four years are shown in **Table 4-1**. The CBWRM estimates a reduction in groundwater storage of 22,200 AF in 2022, an increase of 9,900 AF in 2023, and a reduction of 2,100 AF in 2024.

**Table 4-1: Groundwater Budget Estimates for Water Years 2022, 2023, and 2024**

Component	Water Year 2022 (AFY)	Water Year 2023 (AFY)	Water Year 2024 (AFY)
<b>Inflows</b>			
Deep percolation	13,800	26,900	21,300
Stream seepage	4,500	11,800	8,100
Subsurface inflow	1,400	5,300	2,300
Total Inflow	19,700	44,000	31,700
<b>Outflow</b>			
Groundwater pumping	41,900	34,100	33,800
Total Outflow	41,900	34,100	33,800
<b>Change in Storage</b>	<b>-22,200</b>	<b>+9,900</b>	<b>-2,100</b>

**Table 4-2** shows groundwater extractions by water use sector. The primary use of groundwater extractions in the basin is agricultural, accounting for 99% of the groundwater utilized. Urban water use is primarily in Cuyama and New Cuyama for drinking water supply. Groundwater use for other sectors in the Cuyama Basin is minimal.

As shown in **Table 4-3**, the groundwater extraction estimates were developed using the CBWRM model developed by the CBGSA. The model uses crop acreage from local landowners and LandIQ to estimate crop demands.

**Table 4-2: Groundwater Extraction By Water Use Sector (2024)**

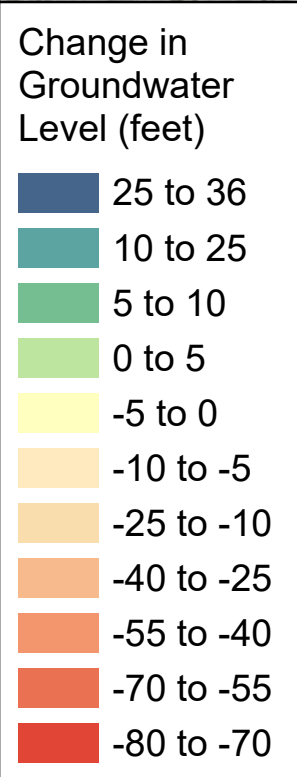
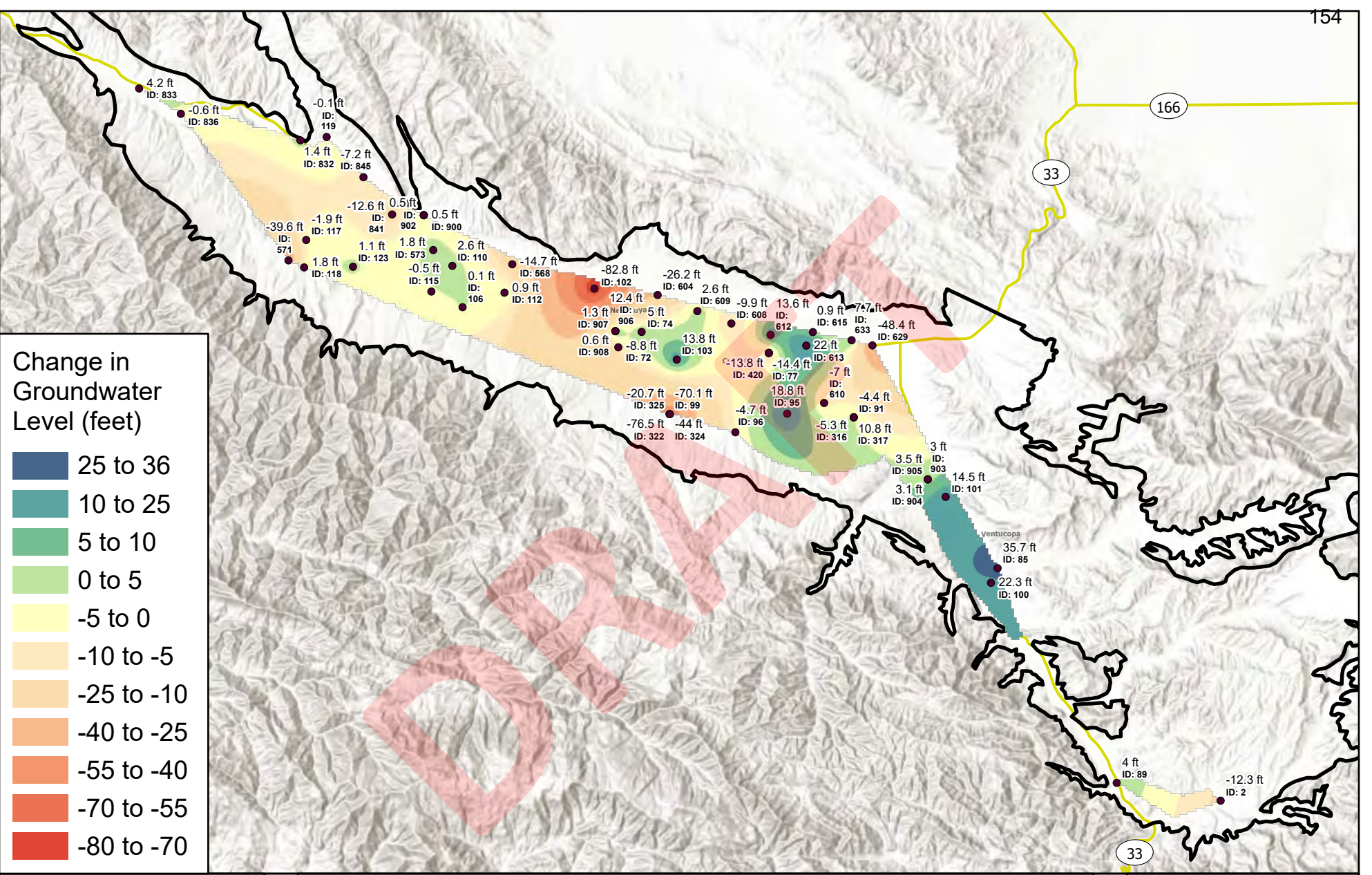
Groundwater Extraction Sector	Total Water Use (Acre-feet)
Agricultural	33,600
Urban	200
Industrial	0
Managed Wetlands	0
Managed Recharge	0
Native Vegetation	0
Other	0
<b>Total</b>	<b>33,800</b>

**Table 4-3: Groundwater Extraction Measurement Volume Methods and Accuracy Table**

Groundwater Extraction Volume	Measurement Type	Method Description	Accuracy	Accuracy Description
33,800	CBWRM	Indirect estimate of groundwater extraction based upon a calculated demand. Crop demand is estimated using locally reported crops per field with the spatial support of LandIQ.	+/-10%	CBWRM utilizes available land use, precipitation, evapotranspiration, soil survey, geological survey, population and per-capita water use data in the subbasin. Since the primary water use sector is agriculture, LandIQ was correlated with local survey data to better estimate crop demand.



Figure Exported: 2/17/2025, By: Dhlunt, Using: WoodardCurran.net\shared\Projects\CA\Cuyama Basin\_GSA0011078.01\_GSP\wp\GIS2\_Maps\3\_2025\_GSP\_Update\02\_Basin\_Settling\_Overview\GSP2025\_dhw\_gwe\aprx



**Figure 4-01: Groundwater Level Change - Fall 2023 to Fall 2024**

**Cuyama Valley Groundwater Basin**

**Legend**

- Measurement Well
- ▭ Cuyama Basin
- Highway

GWL difference was calculated from wells with measurements collected in both October 2023 and 2024. "ID" labels correspond to Opti ID numbers - refer to individual well hydrographs for a more informative view of GWL change.

North Arrow

Woodard & Curran

CUYAMA BASIN  
GROUNDWATER SUSTAINABILITY AGENCY

0 1.25 2.5 5 Miles

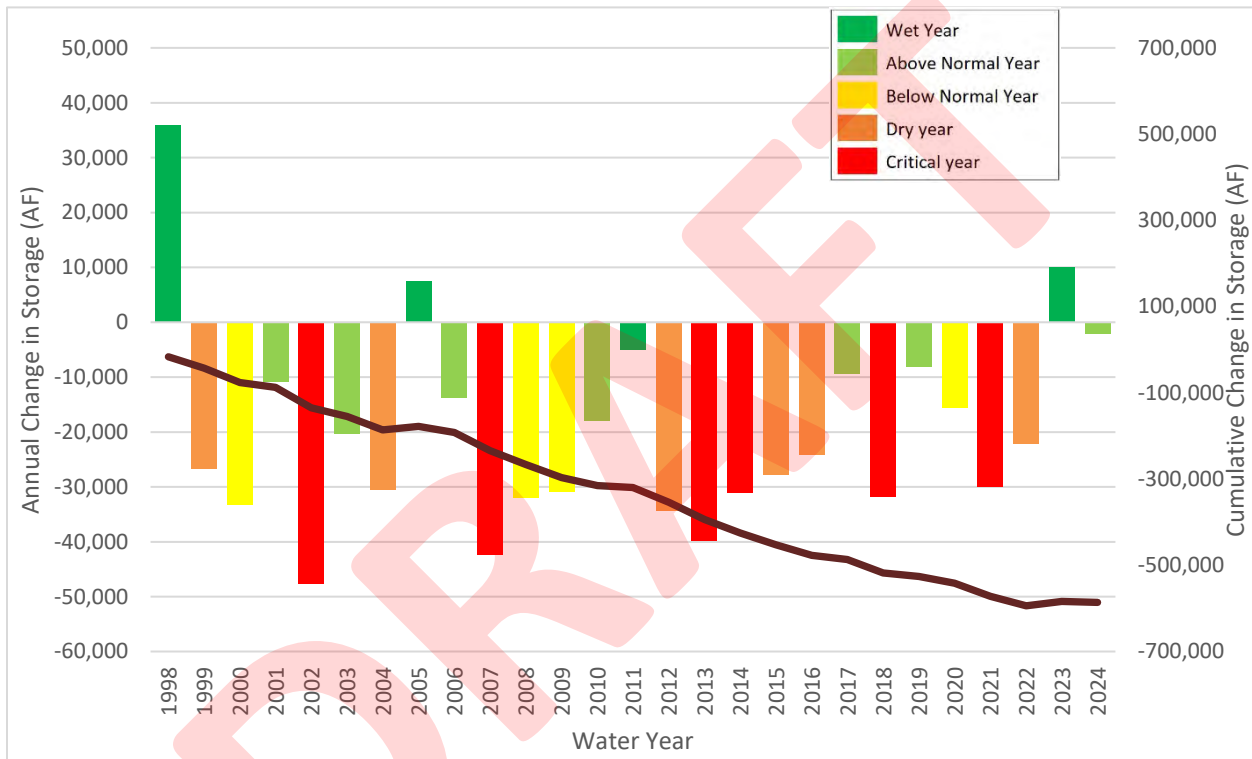
Map Created: February 2025

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**Figure 4-2** shows the historical change in groundwater storage by year, water year type,<sup>5</sup> and cumulative water volume in each year for the period from 1998 through 2024.<sup>6</sup> The change in groundwater storage in each year was estimated by the CBWRM model. The color of bar for each year of change in storage correlates a water year type defined by Basin precipitation.

**Figure 4-2: Change in Groundwater Storage by Year, Water Year Type, and Cumulative Water Volume**



<sup>5</sup> Water year types are customized for the Basin watershed based on annual precipitation as follows:

- Wet year = more than 19.6 inches
- Above normal year = 13.1 to 19.6 inches
- Below normal year = 9.85 to 13.1 inches
- Dry year = 6.6 to 9.85 inches
- Critical year = less than 6.6 inches.

<sup>6</sup> Groundwater storage change estimates for years 1998 through 2021 differ from estimates reported in previous Cuyama Basin Annual Reports due to model updates using the most recent land use data.

## Section 5. Groundwater Quality

As discussed in Section 4.8 of the Cuyama GSP, the CBGSA's groundwater quality network is designed to monitor salinity levels (as total dissolved solids (TDS)). The groundwater quality network prior to the 2025 GSP Update was composed of 64 wells representative wells and 13 non-representative wells, for a total of 77 wells, as shown in **Figure 5-1**.

In 2023 a comprehensive review of the groundwater quality network was conducted after three years of annual sampling for TDS had been performed. Wells were evaluated with respect to the following issues: lack of landowner agreements for monitoring, access issues at well sites, access issues due to weather. Based on this analysis, the CBGSA board approved a revised water quality network in November 2023, which includes 25 representative wells and 12 non-representative wells, is shown in **Figure 5-2**. This revised network will take effect when the 2025 GSP Update is complete and will provide adequate coverage in the Basin while ensuring continued and consistent monitoring during the GSP implementation period.

In 2024, the CBGSA collected TDS measurements at 19 of the 25 representative wells (76%) in the groundwater quality monitoring network. The results are listed in **Table 5-1** and shown on **Figure 5-3**. Of the 19 representative wells measured in water year 2024, 17 wells were lower (i.e. better) than their measurable objective, and one well exceeded the minimum threshold and 2025 interim milestone. Therefore, 4% of representative wells exceeded their minimum threshold. However, 24% of wells were not sampled due to limitations in gaining access to well sites. Water quality results (as compared to minimum thresholds) can be found in **Table 5-1** and **Figure 5-4**. The CBGSA will continue to sample for TDS and will assess the appropriateness of sustainability criteria for TDS in the future.

The CBGSA conducts its own sampling for nitrate and arsenic once every five years. In the interim years the CBGSA leverages existing monitoring programs for nitrate and arsenic through California State Water Resource Control Board Groundwater Ambient Monitoring and Assessment (GAMA) Database, which includes in particular data from the Central Coast Regional Water Board's Irrigated Lands Program for nitrates as part of its database. Nitrate and arsenic data are shown on **Figure 5-5** for nitrate **Figure 5-6** for arsenic. The table on the **Figure 5-6** shows arsenic results from a multi-completion well. As you can see arsenic varies with depth so results for all depths are shown.

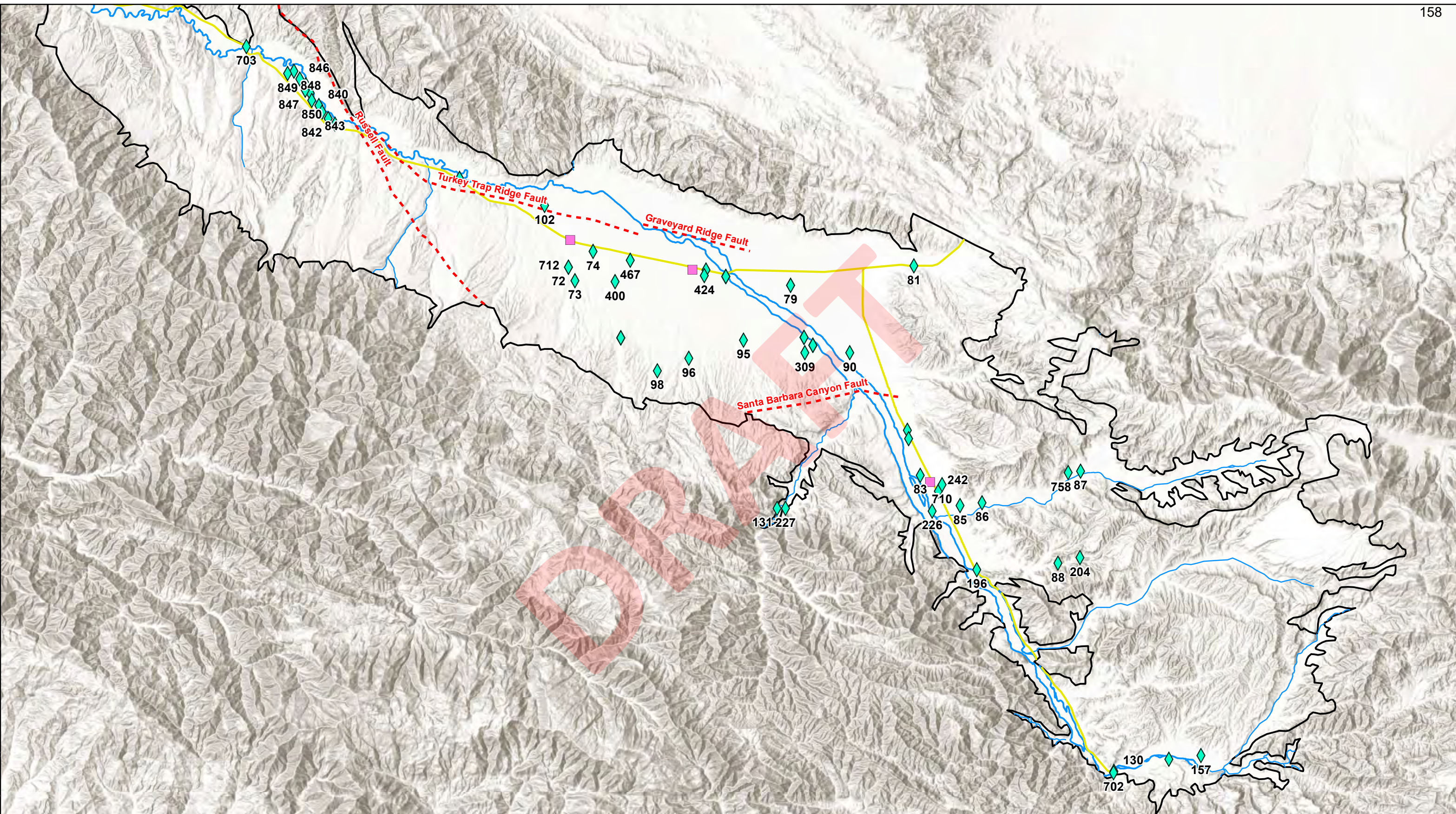
These maps include data downloaded from GAMA and the sampling results from the CBGSA's sampling for these constituents conducted in 2022 and reported in the WY 2022 Annual Report. Because few measurements were available for WY 2023 and WY 2024, these maps include data for water years 2022, 2023 and 2024 in the Cuyama Basin. The CBGSA will continue to rely on these third-party sources as described in the 2022 GSP update Supplemental Section 2.2.7.

**Table 5-1: Groundwater Quality Network Wells and TDS Measurements**

Opti ID	TDS					Interim Milestone Status
	Date	Measurement (mg/L)	MO (mg/L)	MT (mg/L)	2025 Interim Milestone (mg/L)	
61	-	-	585	615	615	
74	8/22/2024	1360	1500	1833	1833	Below IM
77	7/20/2024	1165	1500	1592	1592	Below IM
83	8/21/2024	1110	1500	1726	1726	Below IM
88	8/22/2024	337	302	302	302	Above IM
90	8/22/2024	1120	1500	1593	1593	Below IM
91	7/20/2024	1059	1410	1487	1487	Below IM
96	8/21/2024	1220	1500	1632	1632	Below IM
99	8/22/2024	1060	1490	1562	1562	Below IM
101	8/21/2024	1230	1500	1693	1693	Below IM
102	8/21/2024	1640	1500	2351	2351	Below IM
157	-	-	1500	2360	2360	
242	8/22/2024	883	1470	1518	1518	Below IM
316	7/20/2024	1105	1380	1468	1468	Below IM
317	7/20/2024	1068	1260	1337	1337	Below IM
318	-	-	1080	1152	1152	
322	8/22/2024	1170	1350	1386	1386	Below IM
324	8/22/2024	700	746	777	777	Below IM
325	8/22/2024	1040	1470	1569	1569	Below IM
420	7/20/2024	1121	1430	1490	1490	Below IM
421	7/20/2024	1390	1500	1616	1616	Below IM
422	-	-	1500	1942	1942	
467	8/22/2024	1080	1500	1764	1764	Below IM
841	-	-	561	561	561	
845	-	-	1250	1250	1250	



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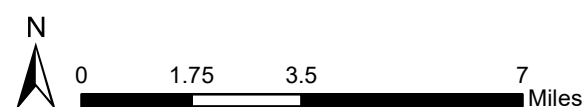
<p><b>Figure 5-1: Cuyama GW Basin Groundwater Quality Representative Wells</b></p> <p>Cuyama Basin Groundwater Sustainability Agency</p> <p>Cuyama Valley Groundwater Basin Groundwater Sustainability Plan</p> <p>December 2019</p>		<p><b>Legend</b></p>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid black; margin-right: 5px;"></span> Cuyama Basin</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: pink; margin-right: 5px;"></span> Towns</li> <li><span style="display: inline-block; width: 15px; border-bottom: 2px dashed red; margin-right: 5px;"></span> Faults</li> <li><span style="display: inline-block; width: 15px; border-bottom: 2px solid yellow; margin-right: 5px;"></span> Highways</li> <li><span style="display: inline-block; width: 15px; border-bottom: 2px solid blue; margin-right: 5px;"></span> Cuyama River</li> <li><span style="display: inline-block; width: 15px; border-bottom: 2px solid blue; margin-right: 5px;"></span> Streams</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid blue; margin-right: 5px;"></span> Representative Groundwater Quality Wells</li> </ul>	
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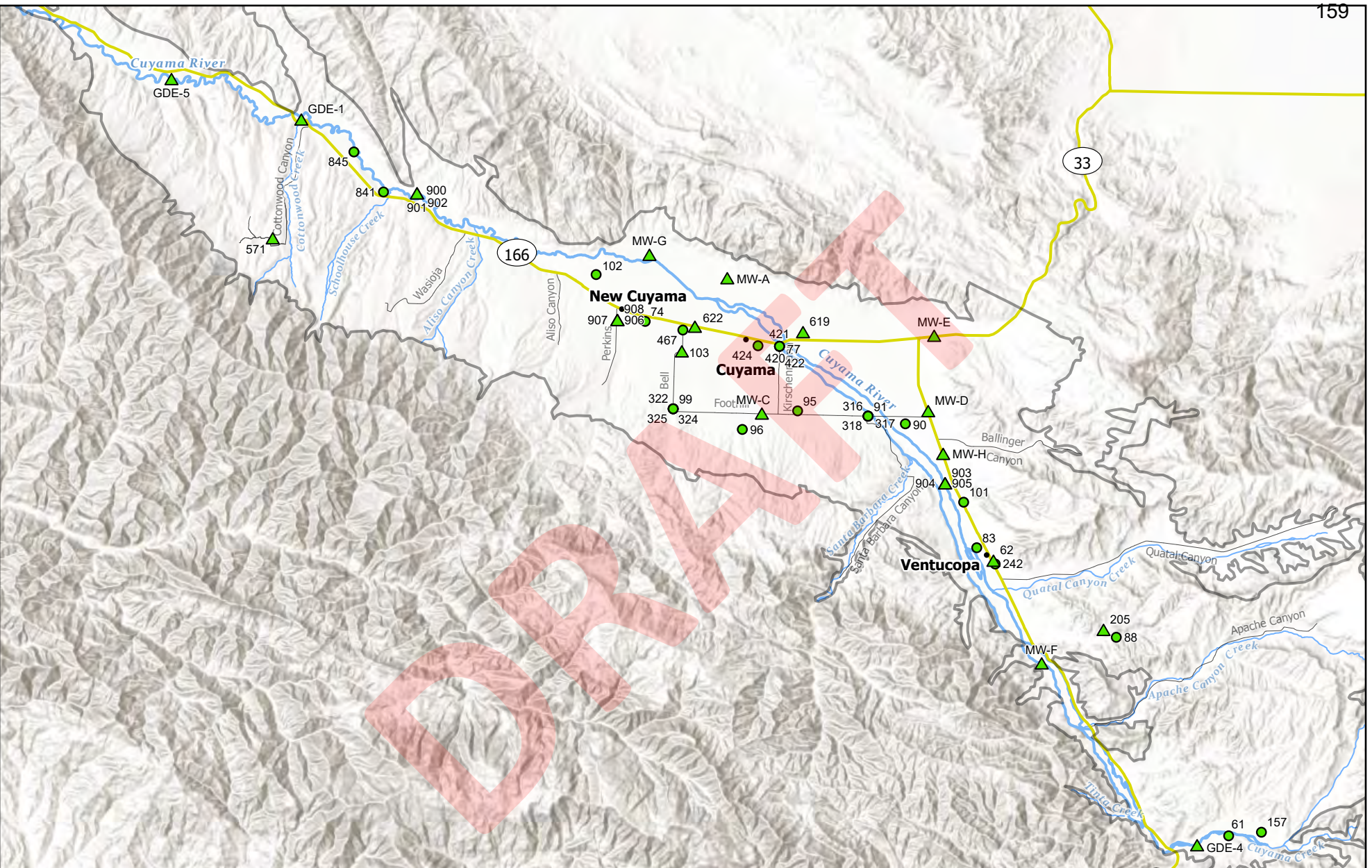


Figure 5-2: Updated Groundwater Quality Monitoring Network

Cuyama Valley Groundwater Basin

Legend

- Network Well
- Representative Monitoring
- ▲ Non-representative Monitoring
- Highway
- Local Road
- Town
- Cuyama River
- Creek
- Cuyama Basin



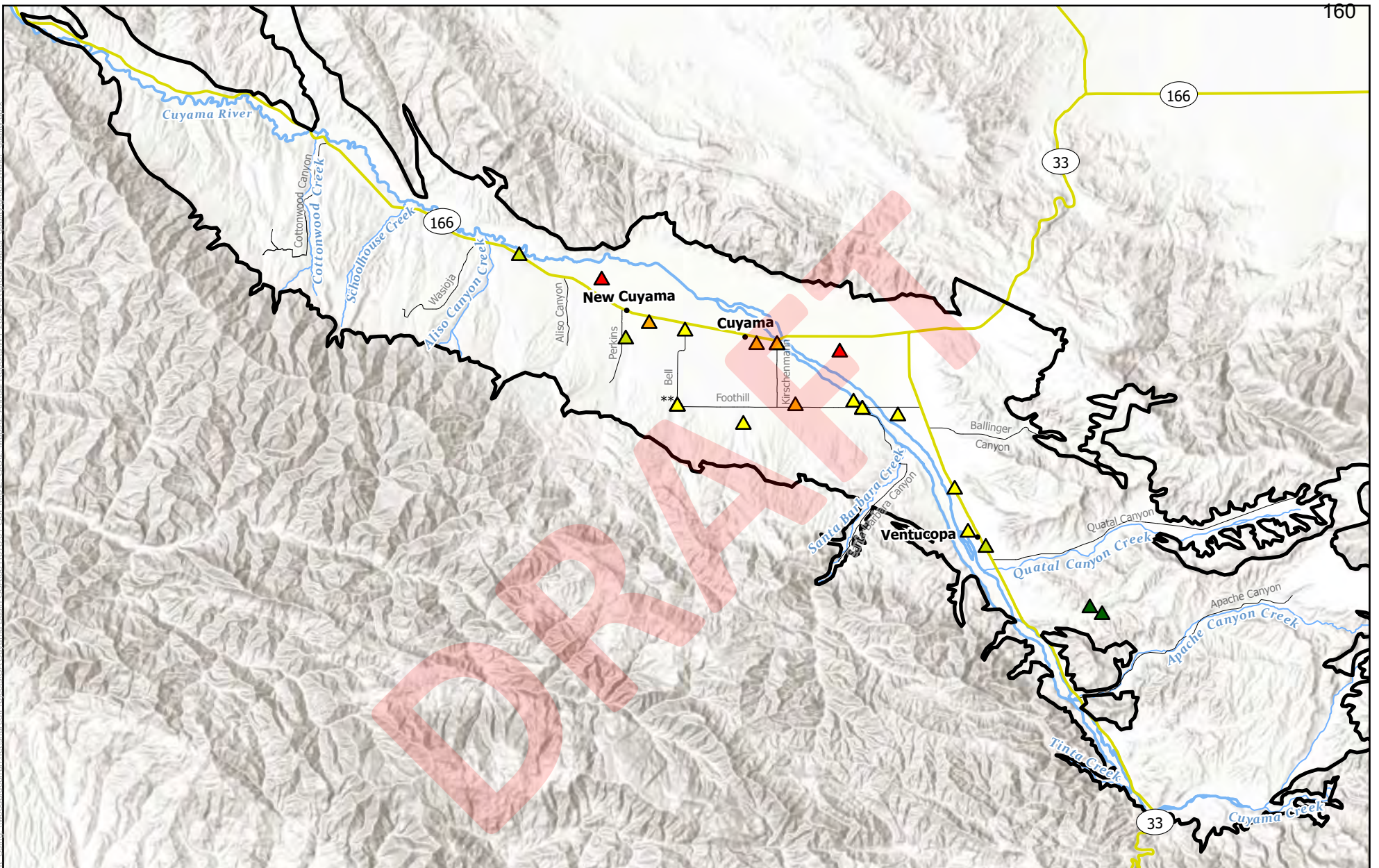
0 1.25 2.5 5 Miles

Map Created: December 2023

Third Party GIS Disclaimer: This map is for reference and graphical purposes only and should not be relied upon by third parties for any legal decisions. Any reliance upon the map or data contained herein shall be at the users' sole risk. Data sources: CA DWR, Esri, USGS. Monitoring well data available in the Opti data catalog: <https://opti.woodardcurran.com/cuyama/login.php>



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**Figure 5-3: Groundwater Quality Measurements - TDS**  
 October 2024 Data  
 Cuyama Valley Groundwater Basin

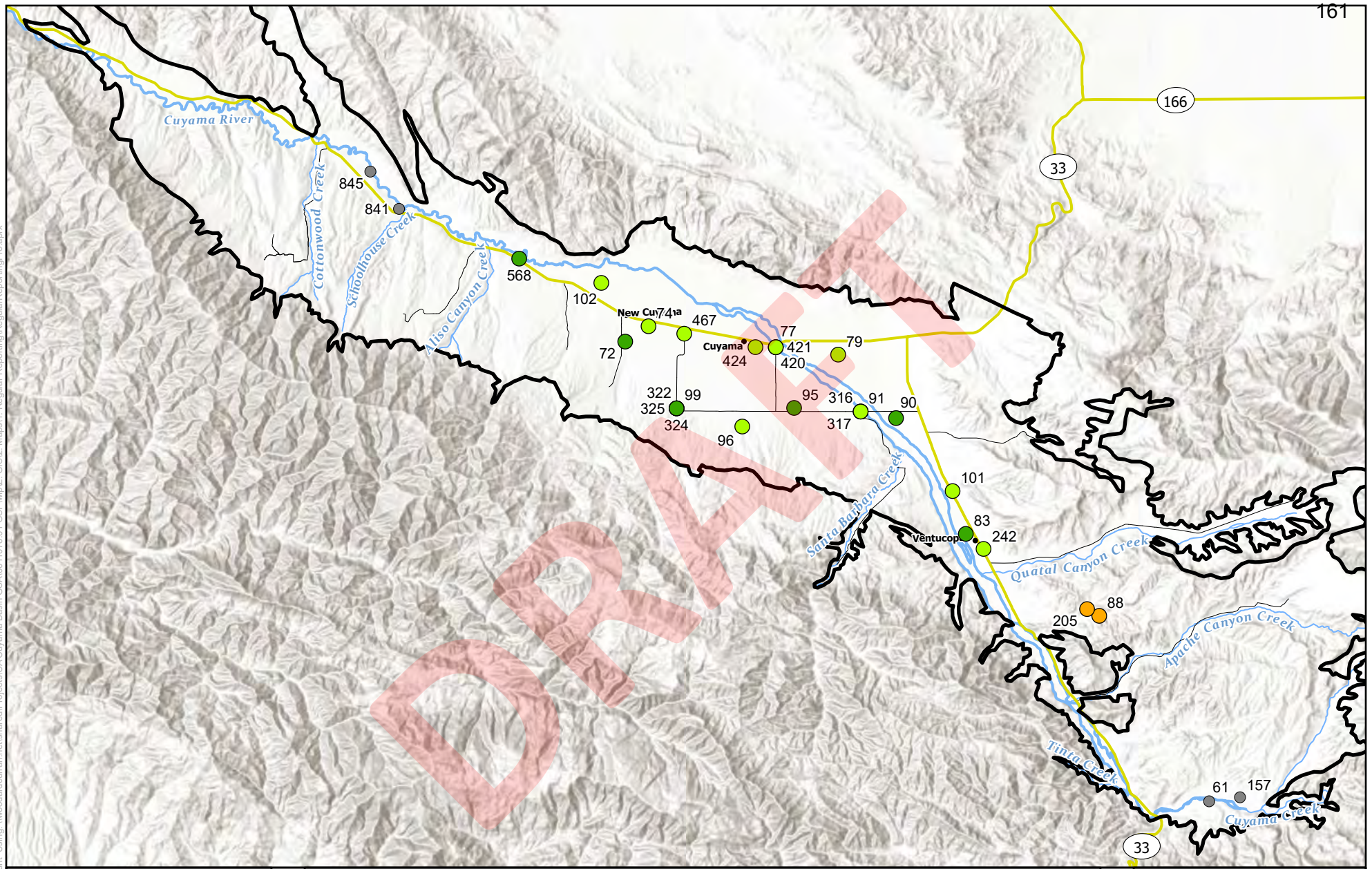
<b>Legend</b>	< 500 mg/L	1,251 - 1,500 mg/L	Highway	Creek
	501 - 750 mg/L	1,501 - 1,750 mg/L	Local Road	Cuyama River
	751 - 1,000 mg/L	1,751 - 2,000 mg/L	Town	Cuyama Basin
	1,001 - 1,250 mg/L	2,000 - 2,500 mg/L	**Nestled well at this location.	

N

Map Created: February 2025

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**Figure 5-4: Groundwater Quality Status - TDS**

Years 2022 to 2024

**Cuyama Valley Groundwater Basin**

**Legend**

- Below Measurable Objective
- More than 10% Below Minimum Threshold
- Within Adaptive Management Zone
- No available data this period
- Cuyama Basin
- Highway
- Local Road
- Town
- Creek
- Cuyama River

Status determined using 2025 sustainable management criteria.



0 1.25 2.5 5 Miles

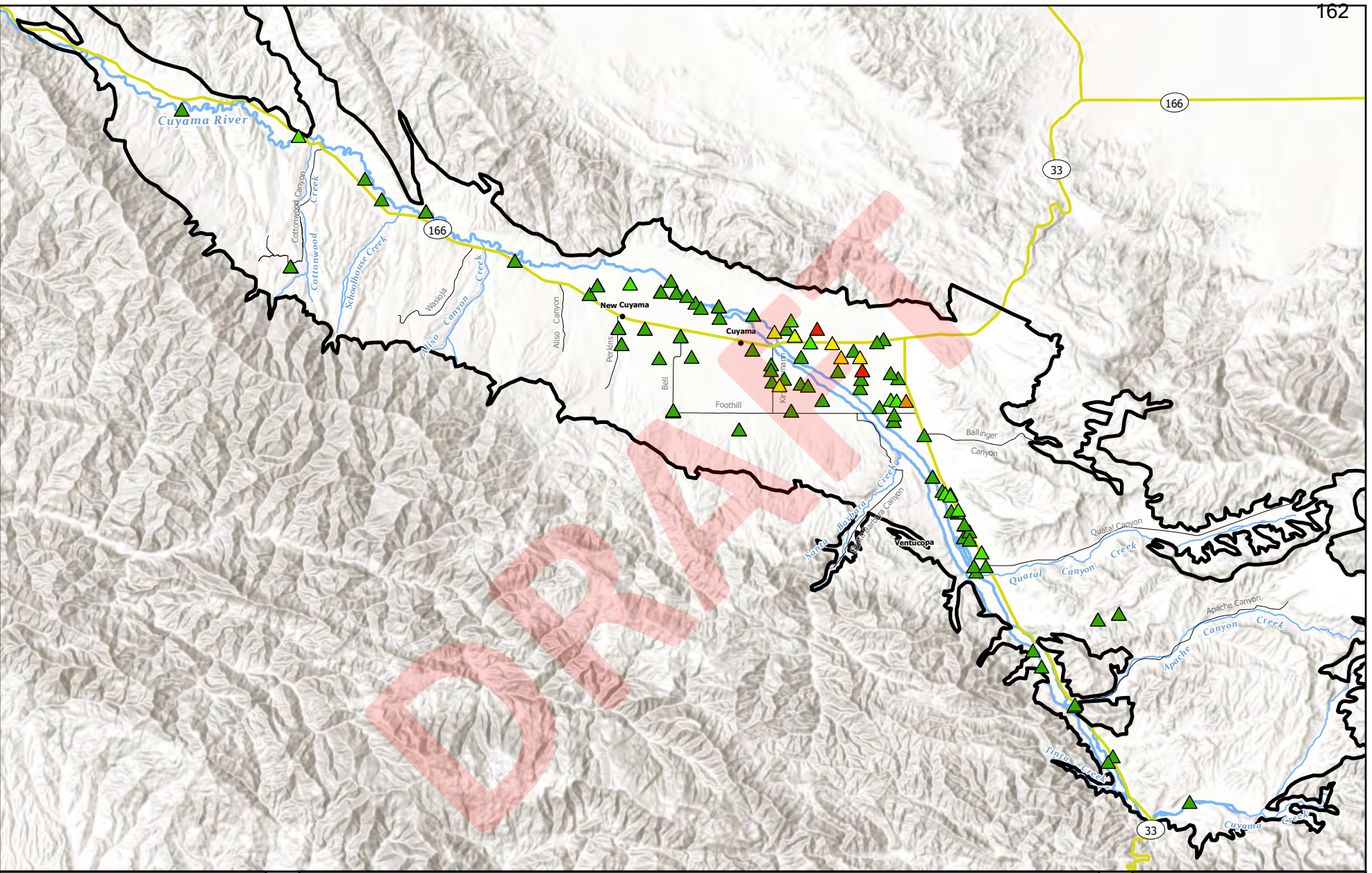
Map Created: February 2025

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**Figure 5-5: Groundwater Quality Measurements - Nitrate as NO<sub>3</sub>-N**  
 Years 2022 to 2024  
**Cuyama Valley Groundwater Basin**

<b>Legend</b>	< 5 mg/L	10 - 15 mg/L	Highway	Creek
	5 - 8 mg/L	15 - 20 mg/L	Local Road	Cuyama River
	8 - 10 mg/L	> 20 mg/L	Town	Cuyama Basin

\*Most recent values from monitoring wells with multiple observations are shown.

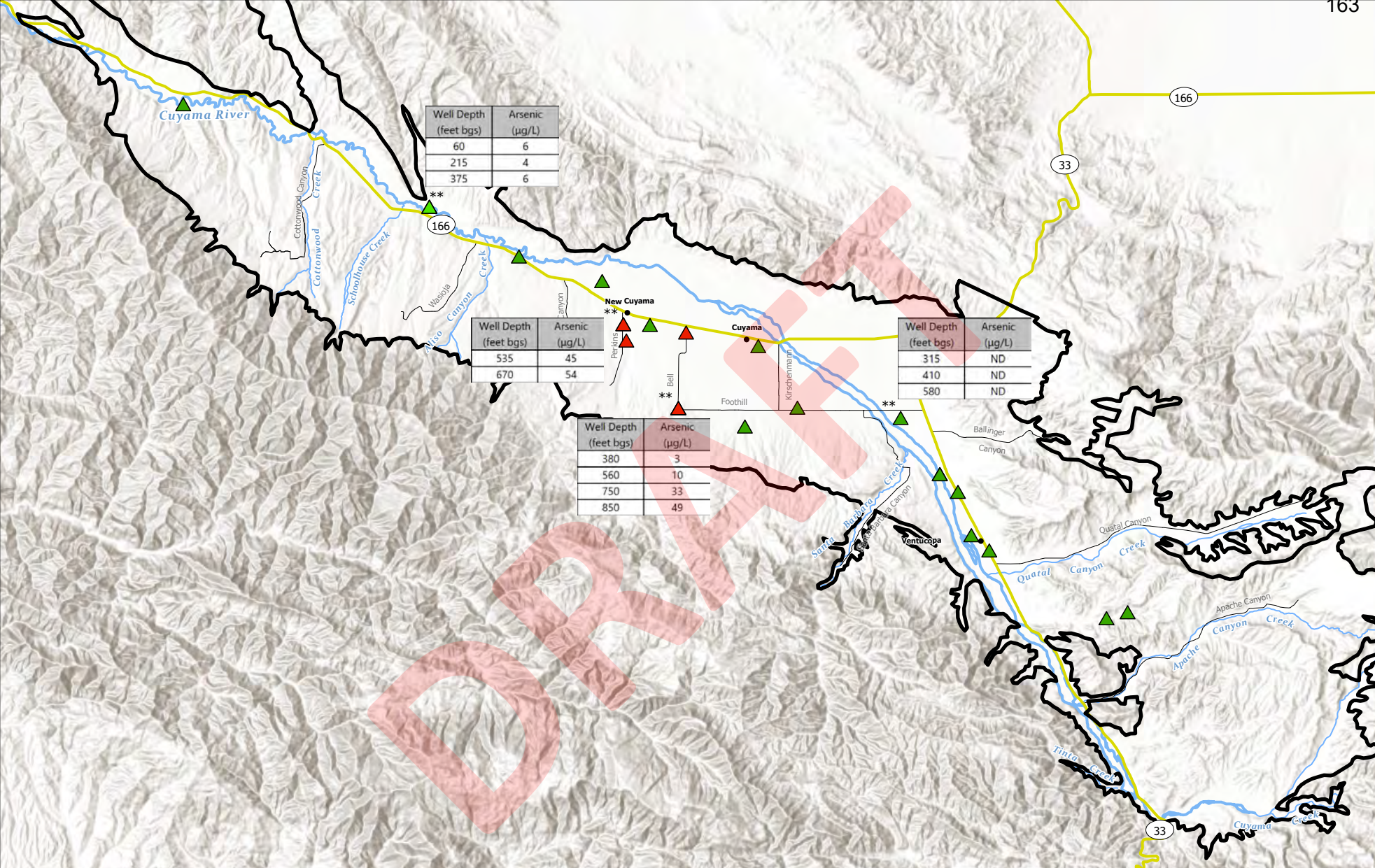
Woodard & Curran

Map Created: February 2025

Third Party GIS Disclaimer: This map is for reference and graphical purposes only and should not be relied upon by third parties for any legal decisions. Any reliance upon the map or data contained herein shall be at the users' sole risk. **Data sources: CA DWR, Esri, USGS**



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**Figure 5-6: Groundwater Quality Measurements - Arsenic**

Years 2022 to 2024

**Cuyama Valley Groundwater Basin**

**Legend**

- ▲ < 5 µg/L      ▲ 10 - 15 µg/L      — Highway      — Creek
- ▲ 5 - 8 µg/L      ▲ 15 - 20 µg/L      — Local Road      — Cuyama River
- ▲ 8 - 10 µg/L      ▲ > 20 µg/L      • Town      □ Cuyama Basin

\*Most recent values from monitoring wells with multiple observations are shown. \*\*Nested well at this location.



0 1.25 2.5 5 Miles

Map Created: February 2025

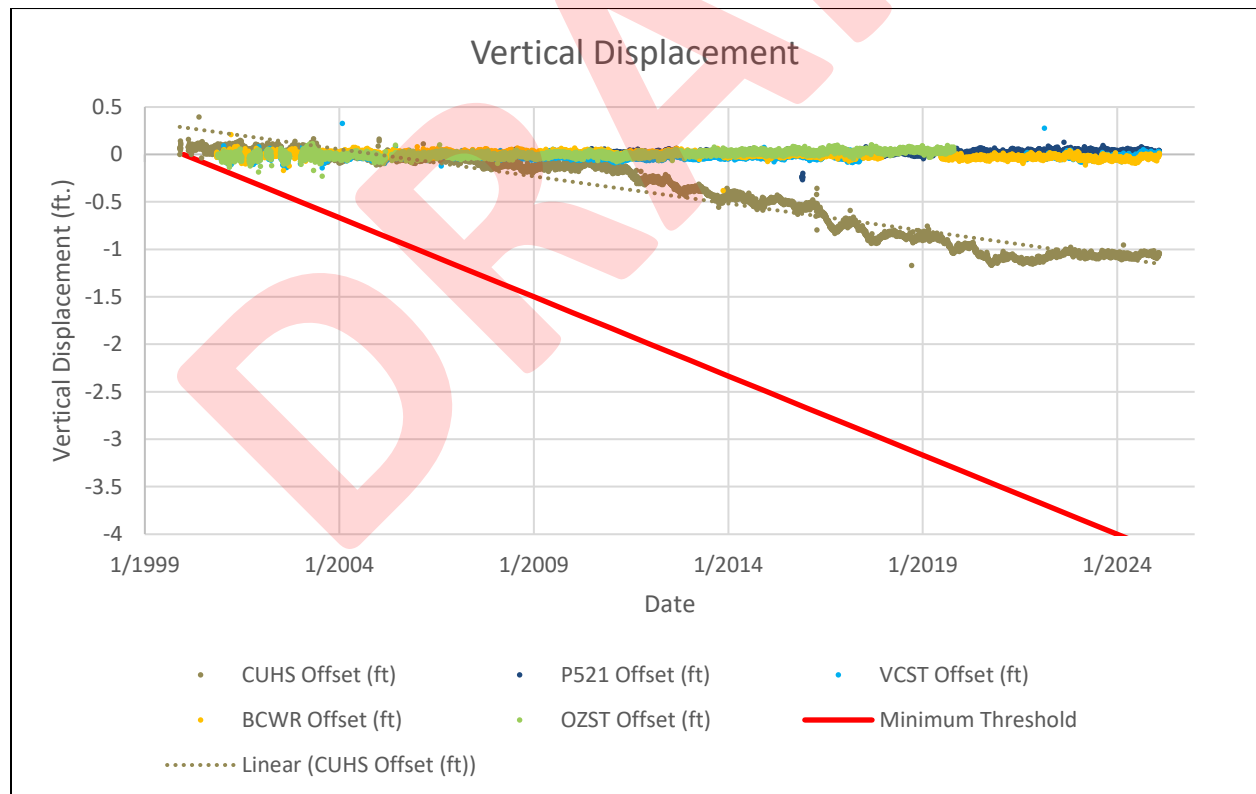
## Section 6. Land Subsidence

Section 4.9 of the Cuyama Basin GSP describes the monitoring network for land subsidence in the Basin, which is composed of five continuous geographic positioning system (CGPS) stations in and around the Basin to monitor lateral and vertical ground movements. Two of the five stations, the Cuyama Valley High School (CUHS) and the Ventucopa (VCST) stations, are within the Basin boundary. The other three stations are outside of the Basin and provide data comparative data for vertical movements that are more likely related to tectonic displacement rather than land subsidence.

The undesirable result for subsidence, as described in Section 3.2.5, is detected when 30 percent of representative subsidence monitoring sites (i.e. 1 of 2 sites) exceed the minimum threshold for subsidence over two years. The minimum threshold for subsidence, as defined in GSP Section 5.6.3, is 2 inches per year.

At the time the GSP was submitted in 2020, subsidence rates for the CUHS station were -0.56 inches per year. As shown in **Figure 6-1** data through 2025 was downloaded from UNAVCO<sup>7</sup> and the subsidence trend for CUHS was recalculated. Subsidence rates during 2021 and 2022 actually reflected a positive change in ground surface elevation, and current subsidence rates in the central portion of the Basin are 1.5 mm per year or 0.06 inches per year (for WY 2024) in an upwards direction. This rate is below the minimum threshold, and thus undesirable results for subsidence are not occurring in the Basin.

**Figure 6-1: Subsidence Monitoring Data**

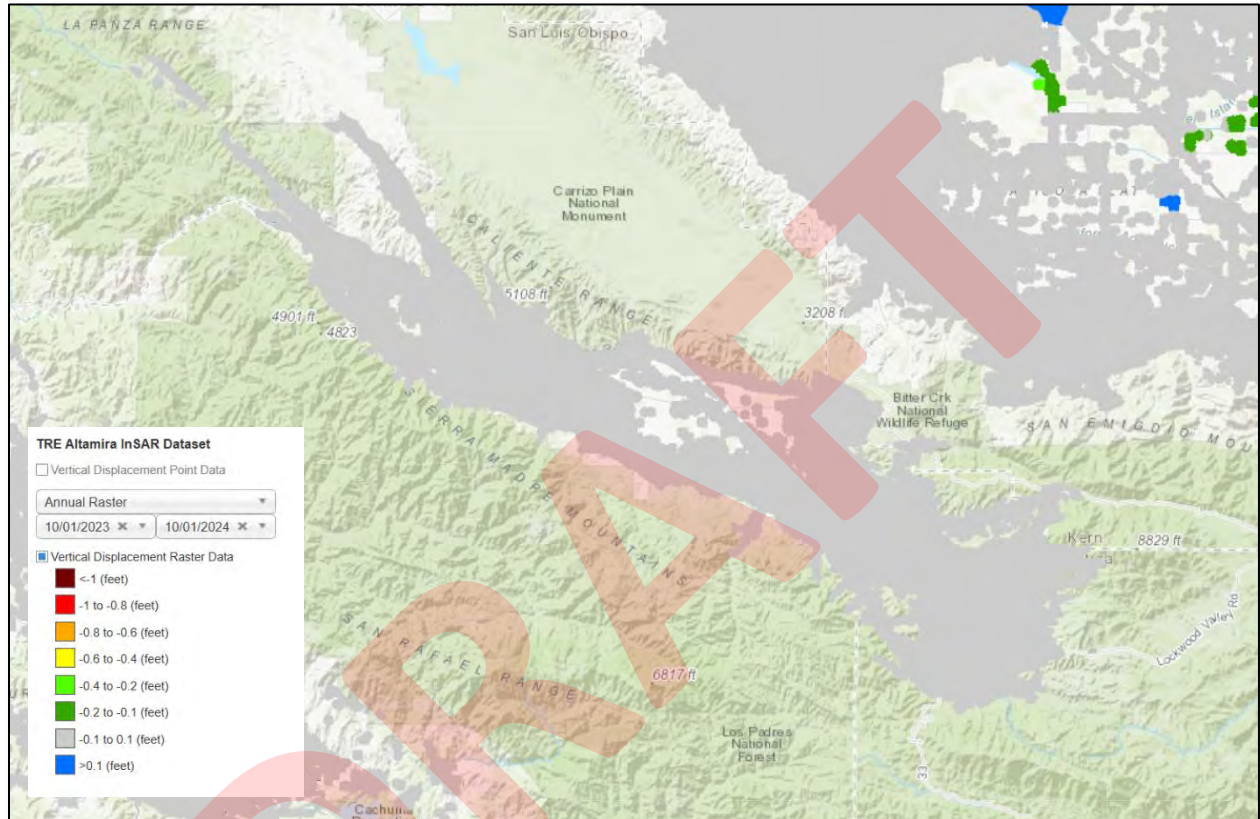


<sup>7</sup> <https://www.unavco.org/data/web-services/documentation/documentation.html#!/GNSS47GPS/getPositionByStationId>



Additional subsidence data is available through TRE Altamira InSAR Dataset from DWR and was used to verify no detrimental or drastic changes had occurred. Raster results are presented in **Figure 6-2** and show no discernable change (between -0.1 and +0.1 feet) over that period.

**Figure 6-2: Cuyama Subsidence Raster from SGMA Data Viewer – TRE Altamira InSAR Data – WY2024**



## Section 7. Plan Implementation

§356.2 (c)	A description of progress toward implementing the Plan, including achieving interim milestones, and implementation of projects or management actions since the previous annual report.
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This section describes management activities taken by the CBGSA to implement the Cuyama Basin GSP from adoption of the GSP through preparation of this Annual Report.

### 7.1 Progress Toward Achieving Interim Milestones

Since the original GSP was adopted by the CBGSA Board recently and CBGSA data collection efforts began in the second half of 2020, progress toward achieving interim milestones is in its early stages.

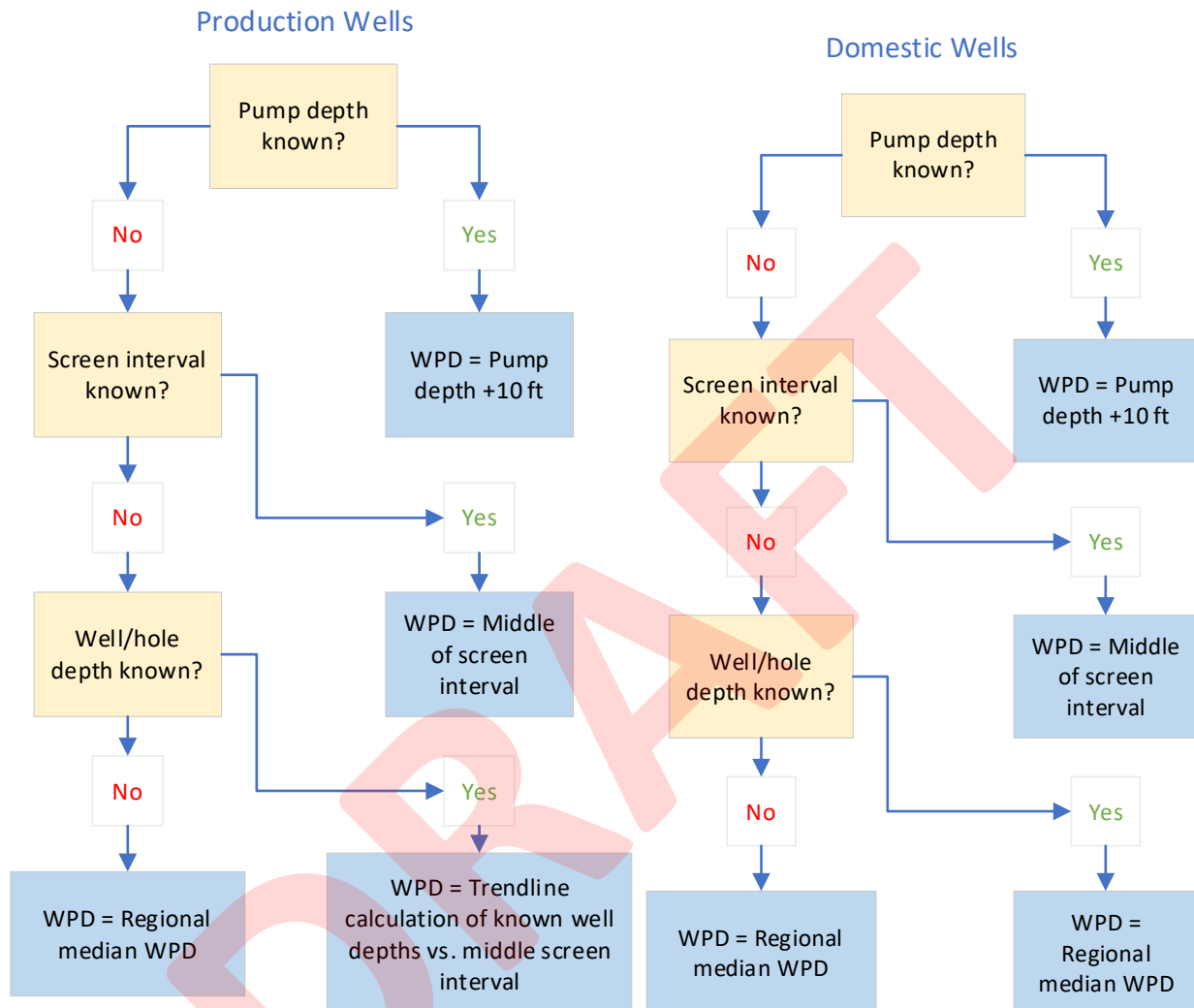
To track changes in groundwater conditions and the Basins progress towards sustainability, the GSA compiles a quarterly groundwater condition reports based on the data collected to monitoring groundwater levels. Current data collection occurs quarterly with corresponding reports. Data collection prior to 2022 was conducted monthly, but the CBGSA determined quarterly data collection was sufficient after a full year of monthly monitoring had been performed.

The Updated 2025 GSP included a reevaluation of thresholds for the groundwater level sustainability indicator, as described in Section 5 (Minimum Thresholds, Measurable Objectives, and Interim Milestones). As described in the 2025 GSP Update, the minimum threshold calculation now uses a stepwise function that takes a conservative approach to protect wells (production and domestic) across the Basin while providing flexibility, when possible, to accommodate the CBGSA planned pumping allocations and reductions strategy. The stepwise function has four potential calculation outcomes:

1. **Combined Well protection and GDE protection depth:** The well protection depth and GDE protection depth were merged together in a GIS analysis process that interpolated the data into a 3-dimensional coverage across the Basin, in the same process elevation points make a topographic map of the surface elevation. For each RMW's location, the interpolated protection depth was then extracted to get the final Well Protection / GDE protection depth value.
  - a. **Well Protection Depth:** The well protection depth is used to ensure that active production and domestic wells within the Basin are protected from harm to their beneficial uses. The well protection depth is a numerical value representing the approximate depth at which, if exceeded, beneficial uses could be impacted in a well. This value is unique and calculated for each active production and domestic well within the Basin where there is available data. Where data is not available, generalized or regional proxy data is utilized. Some wells are screened from this analysis either because they are too far removed from the representative well network (and therefore conditions at the nearest RWM are not indicative of conditions at the active well because of distance and/or other conditions such as geology or topology) or wells were already dry in 2015. The well protection depth is calculated for each pumping well as a four-part stepwise function, with a slight difference in the fourth step between domestic and production wells (Figure 7-1).
  - b. **GDE Protection Depth:** All potential GDE locations in the Basin were assigned a protection depth of 30 ft bgs via a dense spatial point-cloud within each GDE polygon in



GIS. The point-clouds allow GIS to utilize the same data type (points instead of polygons) in the processing required for the protection depth calculation.



**Figure 7-1: Well Protection Depth Stepwise Diagram for Production and Domestic Wells**

- 2. Recent deepest measurement plus 10 ft or 5% buffer (whichever is greater):** Historical data for the last ten years (2013-2023 based on the timing of the development of this methodology) was analyzed to find the deepest depth to water during that period. A buffer of the greater of either 10 ft or 5% of the depth to water value was then added to the max depth. This methodology helps utilize, where appropriate, historical and recently collected data that captures both wet and dry periods. This criteria allows for the flexibility for regions of the Basin that experience significant drawdown and recovery during dry and wet hydrologic cycles to manage those variations in groundwater elevation.
- 3. Projected depth of water in 2040 based on modeled glidepath:** The Cuyama Basing Groundwater Model (updated in 2024) was used to project the depth of water in 2040 based on

the CBGSA’s planned allocation and glidepath pumping reductions. In regions of the Basin where there is significant pumping, this allows for groundwater levels to decline to where the model predicts they will be in 2040 given the anticipated schedule for pumping reductions.

4. **Saturated thickness in areas of greater geologic understanding:** The calculation for this strategy uses the localized region’s total average saturated thickness for the primary storage area and calculating 15 percent of that depth. Because there is an area in the northwestern portion of the Basin with greater geological research and understanding, the saturated thickness provides a measurable and defined direct relationship between available water in the aquifer, storage capacity, and undesirable conditions. As discussed in the following section, additional analysis has also been conducted to ensure that the calculated MTs in this area do not impact beneficial uses or uses at any nearby active wells or potential GDEs.

Using these four options above, the stepwise function to determine the appropriate MT for each RMW is as follows:

1. For RMWs that used the saturated thickness approach in the approved 2020 GSP, utilize that same approach.
2. For RMWs that did not utilize the saturated thickness approach in the approved 2020 GSP,
  - a. First find the deeper of these two values:
    - i. Deepest depth to water (DTW) from 2013-2023 + buffer
    - ii. Cuyama Basin groundwater model projected DTW in 2040
3. Then find the shallower value between Step 2a, the WPD and the GDE protection depth

As outlined in the GSP, undesirable results for the chronic lowering of groundwater levels occurs, “when 30 percent of representative monitoring wells... fall below their minimum groundwater elevation threshold for two consecutive years.” (Cuyama GSP, pg. 3-2). As of October 2024, 11% of representative wells (5 of 47) were below the minimum threshold. ([Cuyama Groundwater Conditions Report](#), pg. 1). Undesirable results conditions have therefore not been met.

Cuyama Basin Groundwater Sustainability Plan—  
2023-2024 WY Annual Report

**Table 7-1: Measured Depths to Groundwater Compared to 2025 Minimum Thresholds**

Well	Region	Depth to Water (feet)	Measurement Month	Minimum Threshold (feet)	Status
72	Central	161	October 2024	373	Above Measurable Objective
74	Central	246	October 2024	322	Above Measurable Objective
77	Central	518	October 2024	514	Below Minimum Threshold (4 months)
91	Central	681	October 2024	730	Above Measurable Objective
95	Central	589	October 2024	597	More than 10% above Minimum Threshold
96	Central	340	October 2024	369	Above Measurable Objective
99	Central	361	October 2024	379	Above Measurable Objective
102	Central	370	October 2024	470	Above Measurable Objective
103	Central	233	October 2024	379	Above Measurable Objective
112	Central	83	October 2024	102	Above Measurable Objective
114	Central	47	October 2024	58	Above Measurable Objective
316	Central	681	October 2024	731	Above Measurable Objective
317	Central	679	October 2024	700	More than 10% above Minimum Threshold
322	Central	368	October 2024	387	Above Measurable Objective
324	Central	337	October 2024	365	Above Measurable Objective
325	Central	312	October 2024	331	Above Measurable Objective
420	Central	519	October 2024	514	Below Minimum Threshold (4 months)
421	Central	503	October 2024	514	More than 10% above Minimum Threshold
474	Central	128	October 2024	197	Above Measurable Objective
568	Central	50	October 2024	47	Below Minimum Threshold (1 month)
604	Central	466	October 2024	544	Above Measurable Objective
608	Central	441	October 2024	504	Above Measurable Objective
609	Central	436	October 2024	499	Above Measurable Objective
610	Central	642	October 2024	557	Below Minimum Threshold (51 months)
612	Central	464	October 2024	513	Above Measurable Objective
613	Central	506	October 2024	578	Above Measurable Objective
615	Central	516	October 2024	588	Above Measurable Objective
629	Central	578	October 2024	613	Above Measurable Objective
633	Central	558	October 2024	605	More than 10% above Minimum Threshold
62	Eastern	-	-	212	No available data this period (above MO in April 2024)
85	Eastern	140	October 2024	200	Above Measurable Objective

Cuyama Basin Groundwater Sustainability Plan—  
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Well	Region	Depth to Water (feet)	Measurement Month	Minimum Threshold (feet)	Status
100	Eastern	72	October 2024	186	Above Measurable Objective
101	Eastern	91	October 2024	138	Above Measurable Objective
841	Northwestern	71	October 2024	203	Above Measurable Objective
845	Northwestern	78	October 2024	203	Above Measurable Objective
2	Southeastern	34	October 2024	52	Above Measurable Objective
89	Southeastern	25	October 2024	62	Above Measurable Objective
106	Western	141	October 2024	164	Above Measurable Objective
107	Western	72	October 2024	122	Above Measurable Objective
117	Western	154	October 2024	163	Above Measurable Objective
118	Western	50	October 2024	40	Below Minimum Threshold (49 months)
571	Western	106	October 2024	142	Above Measurable Objective
573	Western	66	October 2024	93	More than 10% above Minimum Threshold
830	Far-West Northwestern	-	-	63	No available data this period (above MO in July 2024)
832	Far-West Northwestern	32	October 2024	50	Above Measurable Objective
833	Far-West Northwestern	18	October 2024	48	More than 10% above Minimum Threshold
836	Far-West Northwestern	29	October 2024	49	More than 10% above Minimum Threshold

\*Well 608 is now confirmed to be “destroyed” and is no longer available for monitoring. The landowner and monitoring staff have identified a well within 100 ft that is suitable to continue monitoring in this location, which is where the measurement shown was taken. The groundwater level representative network will be modified to remove well 608 and add in this new well. The new well is in the process of being incorporated into Opti and being assigned an ID number.

## 7.2 Funding to Support GSP Implementation

On May 1, 2024, the CBGSA Board held a rate hearing and set a groundwater extraction fee of \$5 per acre-foot for FY 24-25.

Additionally, the CBGSA has been awarded a \$7.6 million in grant fund under the Critically Overdrafted Basin (COD) SGMA Implementation Round 1 grant opportunity, with funding awarded for the following activities through April, 2025:

- Ongoing Monitoring and Enhancements
  - Installation of Piezometers
  - installation of dedicated monitoring wells
  - DMS maintenance and enhancements
  - Groundwater level and quality monitoring
  - USGS stream gage maintenance



- Project and Management Action Implementation
  - CBWRM model update and re-calibration
  - Develop and implement framework for pumping allocations
  - Analysis of management actions implementation options
  - Adaptive management support
  - Precipitation enhancement technical analysis
  - Flood and stormwater capture technical analysis
- GSP Implementation and Outreach Activities
  - GSP implementation program management
  - Stakeholder engagement and community outreach
  - Prepare annual reports
  - Modify GSP in response to DWR determination
  - 5-year GSP update
- Improving Understanding of Basin Water Use
  - Perform updated land use survey
  - Perform river channel survey
  - Enhance existing CIMIS station and implement new stations

The CBGSA has also submitted a proposal to DWR for approximately \$2 million under the SGMA Implementation Round 2 grant opportunity with funding to do additional implementation tasks. The CBGSA however did not get funding through that grant opportunity.

### 7.3 Stakeholder Outreach Activities in Support of GSP Implementation

The following is a list of public meetings where GSP development and implementation was discussed during the 2023-2024 water year.

- [CBGSA Board meetings](https://cuyamabasin.org/board-of-directors)<sup>8</sup>: October 12, November 1, December 22, January 2, January 10, March 6, May 1, May 23, July 10, July 31, and September 4
- [Standing Advisory Committee \(SAC\) meetings](https://cuyamabasin.org/standing-advisory-committee)<sup>9</sup>: October 12, October 26, January 4, February 29, April 25, July 1, July 25, and August 29

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<sup>8</sup> <https://cuyamabasin.org/board-of-directors>

<sup>9</sup> <https://cuyamabasin.org/standing-advisory-committee>

## 7.4 Progress on Implementation of GSP Projects

**Table 7-2** shows the projects and management actions that were included in the GSP. The following subsections describe the progress of implementation of each GSP project.

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**Table 7-2: Summary of Projects and Management Actions included in the GSP**

Activity	Current Status	Anticipated Timing	Estimated Cost <sup>a</sup>
Project 1: Flood and Stormwater Capture	Water rights analysis of potential water supplies currently underway	<ul style="list-style-type: none"> <li>Feasibility study: 0 to 5 years</li> <li>Design/Construction: 5 to 15 years</li> </ul>	<ul style="list-style-type: none"> <li>Study: \$1,000,000</li> <li>Flood and Stormwater Capture Project: \$600-\$800 per AF (\$2,600,000 – 3,400,000 per year)</li> </ul>
Project 2: Precipitation Enhancement	Study currently underway by Desert Research Institute	<ul style="list-style-type: none"> <li>Refined project study: 0 to 2 years</li> <li>Implementation of Precipitation Enhancement: 0 to 5 years</li> </ul>	<ul style="list-style-type: none"> <li>Study: \$200,000</li> <li>Precipitation Enhancement Project: \$25 per AF (\$150,000 per year)</li> </ul>
Project 3: Water Supply Transfers/Exchanges	Not yet begun	<ul style="list-style-type: none"> <li>Feasibility study/planning: 0 to 5 years</li> <li>Implementation in 5 to 15 years</li> </ul>	<ul style="list-style-type: none"> <li>Study: \$200,000</li> <li>Transfers/Exchanges: \$600-\$2,800 per AF (total cost TBD)</li> </ul>
Project 4: Improve Reliability of Water Supplies for Local Communities	In progress for CCSD; not yet begun for other communities	<ul style="list-style-type: none"> <li>Feasibility studies: 0 to 2 years</li> <li>Design/Construction: 1 to 5 years</li> </ul>	<ul style="list-style-type: none"> <li>Study: \$100,000</li> <li>Design/Construction: \$1,800,000</li> </ul>
Management Action 1: Basin-Wide Economic Analysis	Completed	<ul style="list-style-type: none"> <li>December 2020</li> </ul>	<ul style="list-style-type: none"> <li>\$60,000</li> </ul>
Management Action 2: Pumping Allocations in Central Basin Management Area	Allocations developed for 2025 through 2029	<ul style="list-style-type: none"> <li>Allocations implemented: 2023 through 2040</li> </ul>	<ul style="list-style-type: none"> <li>Plan: \$300,000</li> <li>Implementation: \$150,000 per year</li> </ul>
Adaptive Management	Board ad-hoc committee has been formed and is considering potential actions	Only implemented if triggered; timing would vary	TBD

<sup>a</sup> Estimated cost based on planning documents and professional judgment  
AF = acre-feet

### 7.4.1 Project 1: Flood and Stormwater Capture

The CBGSA application for COD SGMA Implementation Grant funding from DWR includes a task to understand the feasibility of future flood and stormwater capture. Specifically, funding was sought to perform a water rights analysis on flood and stormwater capture flows in the Basin to understand the feasibility of further developing a stormwater capture project in the Basin given water availability and existing water rights. Initial work has been done to look at reservoir operations data to see during what windows during Twitchell Reservoir there were managed released and to assess the possibility of capturing this excess water upstream in the Cuyama Basin. Our current data suggests that this occurs 11% of the time.

The CBGSA also looked at USGS stream flow gages in the area to correlate time periods when reservoirs were releasing water to see how much stormwater may be available for capture. Additional analysis will be done in the coming year to assess the feasibility of implementation of a flood and stormwater capture project. This water rights analysis has not yet been completed but is expected to be completed in 2025.

#### **7.4.2 Project 2: Precipitation Enhancement**

The CBGSA application for COD SGMA Implementation Grant funding from DWR, which includes a task to understand the feasibility of precipitation enhancements efforts. Specifically, funding was sought to perform a study of the precipitation enhancement action identified in the GSP to determine if this action should be pursued and implemented in the Basin. The CBGSA contracted with the Desert Research Institute (DRI) to assess cloud seeding effects on Santa Barbara County and the Cuyama Valley. A proposal was submitted in September 2023 and work was initiated in October. A final report which will provide additional acre feet potential of precipitation from cloud seeding is expected in 2025.

#### **7.4.3 Project 3: Water Supply Transfers or Exchanges**

No progress was made toward implementation of this project since completion of the GSP in January 2020. This project will be explored if Project 1 mentioned above: flood and stormwater capture was feasible but greater volumes of water are desired.

#### **7.4.4 Project 4: Improve Reliability of Water Supplies for Local Communities**

This management action includes consideration of opportunities to improve water supply reliability for Ventucopa within CCSD service area. Potential projects include a replacement well for CCSD and improvement of Ventucopa Water Supply Company (VWSC's) existing well. Since the 2020 GSP adoption DWR's IRWM program awarded CCSD a grant to install a new production well. Work by the CCSD to install the new well is ongoing.

### **7.5 Management Actions**

**Table 7-2** shows the projects and management actions that were included in the GSP. The following subsections describe the progress of implementation of each GSP management action.

#### **7.5.1 Management Action 1: Basin-Wide Economic Analysis**

A Basin-wide direct economic analysis of proposed GSP actions was completed. The results of this analysis were presented to the GSP Board on December 4, 2019, and the final report was completed in December 2019. The final Basin-wide economic analysis report was provided in the 2020 Annual Report. This management action is 100% complete.

#### **7.5.2 Management Action 2: Pumping Allocations in Central Basin Management Area**

CBGSA staff has worked and continues to work with the Board and stakeholders to implement pumping allocations in the Central Management Area which began in the 2023 calendar year. As directed by the Board, in July 2022, CBGSA staff developed pumping allocations for 2023 and 2024 for each parcel located within the Central Management Area. These allocations reflect a 5% reduction in 2023 and a 10% reduction in 2024 relative to baseline levels. Actual pumping was reported for most water users in the Central Management Area in 2023, with all users at or below their pumping allocation amount for 2023.

Allocations for 2025 through 2029 were developed in conjunction with the development of the 2025 GSP Update and were approved by the Board in January 2025. These new allocations take into consideration a new management area boundary developed using the same methodology as the previous management area,



but utilizing the updated model and recent monitoring data. These allocations are available for review on the CBGSA website.

### **7.5.3 Consideration of Pumping Allocations Outside of Central Management Area**

The 2025 GSP Update included a Ventucopa Management Area but did not include a management action to implement pumping allocations outside the Central Management Area. Instead the CBGSA plans to develop a management plan for the Ventucopa Management Area in the future. Since the 2025 GSP Update was just recently submitted, no new information has been collected that would indicate that pumping allocations should be implemented outside the Central Management Area at this time. This will be re-considered in future Annual Reports.

## **7.6 Adaptive Management**

As discussed in the previous annual report, because several wells in the Basin are trending towards undesirable results, the CBGSA Board has undertaken efforts to review wells that have exceeded minimum thresholds, investigate potential causes of the exceedances, and identify if any domestic or production wells are affected by declining groundwater levels. During WY 2024, several wells with groundwater levels that previously exceeded minimum thresholds recovered to above these threshold levels.

The Board continues to consider potential actions to address minimum threshold exceedances, including restricting pumping in individual wells, adjusting minimum thresholds or the undesirable result criteria identified in the GSP, and accelerating basin-wide pumping reductions. Potential options for implementing these actions will continue to be discussed by the Board during the upcoming water year.

## **7.7 Progress Toward Implementation of Monitoring Networks**

This section provides updates about implementation of the monitoring networks identified during GSP development.

### **7.7.1 Groundwater Levels Monitoring Network**

In October 2021 the CBGSA transitioned to quarterly groundwater monitoring from its groundwater levels network. The CBGSA goes out in the field and collects Depth to Water measurements quarterly and attempts to take measurements from each of the representative and non-representative wells in the monitoring network. The results of this groundwater level monitoring are shown in Table 7-1. In September 2023, the CBGSA board voted to revise the monitoring network; the revised monitoring network has been included in the 2025 GSP Update and reflected in this Annual Report.

### **7.7.2 Surface Water Monitoring Network**

Under a Category 1 grant from DWR, two new surface flow gages were installed on the Cuyama River during 2021. These gages are managed by the United States Geologic Survey (USGS), and data collected at the gage locations are available on the USGS website at the following links:

[https://waterdata.usgs.gov/nwis/uv?site\\_no=11136500](https://waterdata.usgs.gov/nwis/uv?site_no=11136500)

[https://waterdata.usgs.gov/ca/nwis/uv?site\\_no=11136710](https://waterdata.usgs.gov/ca/nwis/uv?site_no=11136710)

## Section 8. References

California Department of Water Resources (DWR). 2003. *California's Groundwater Bulletin 118—Update 2003*. <https://water.ca.gov/LegacyFiles/groundwater/bulletin118/basindescriptions/3-13.pdf>

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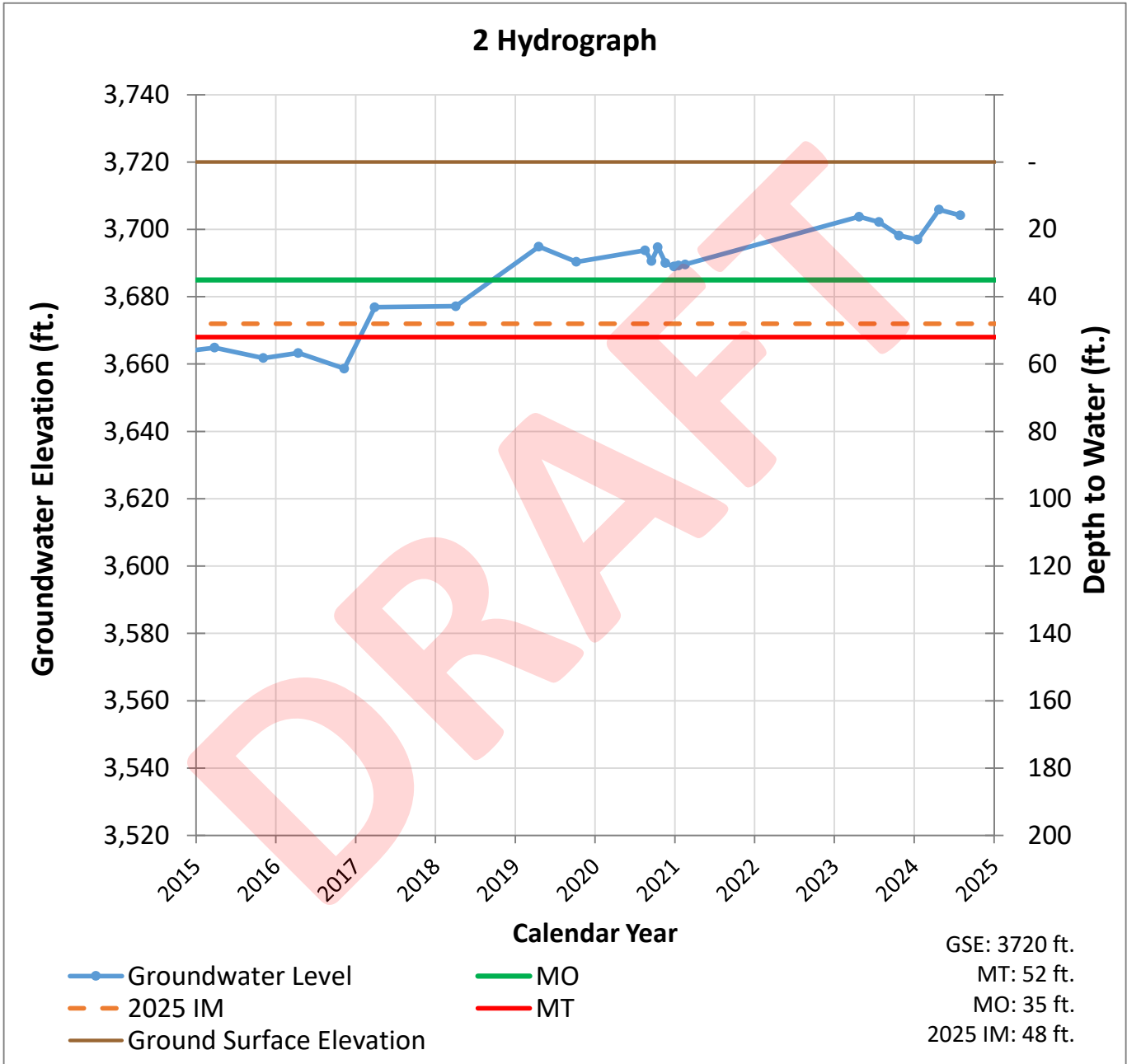
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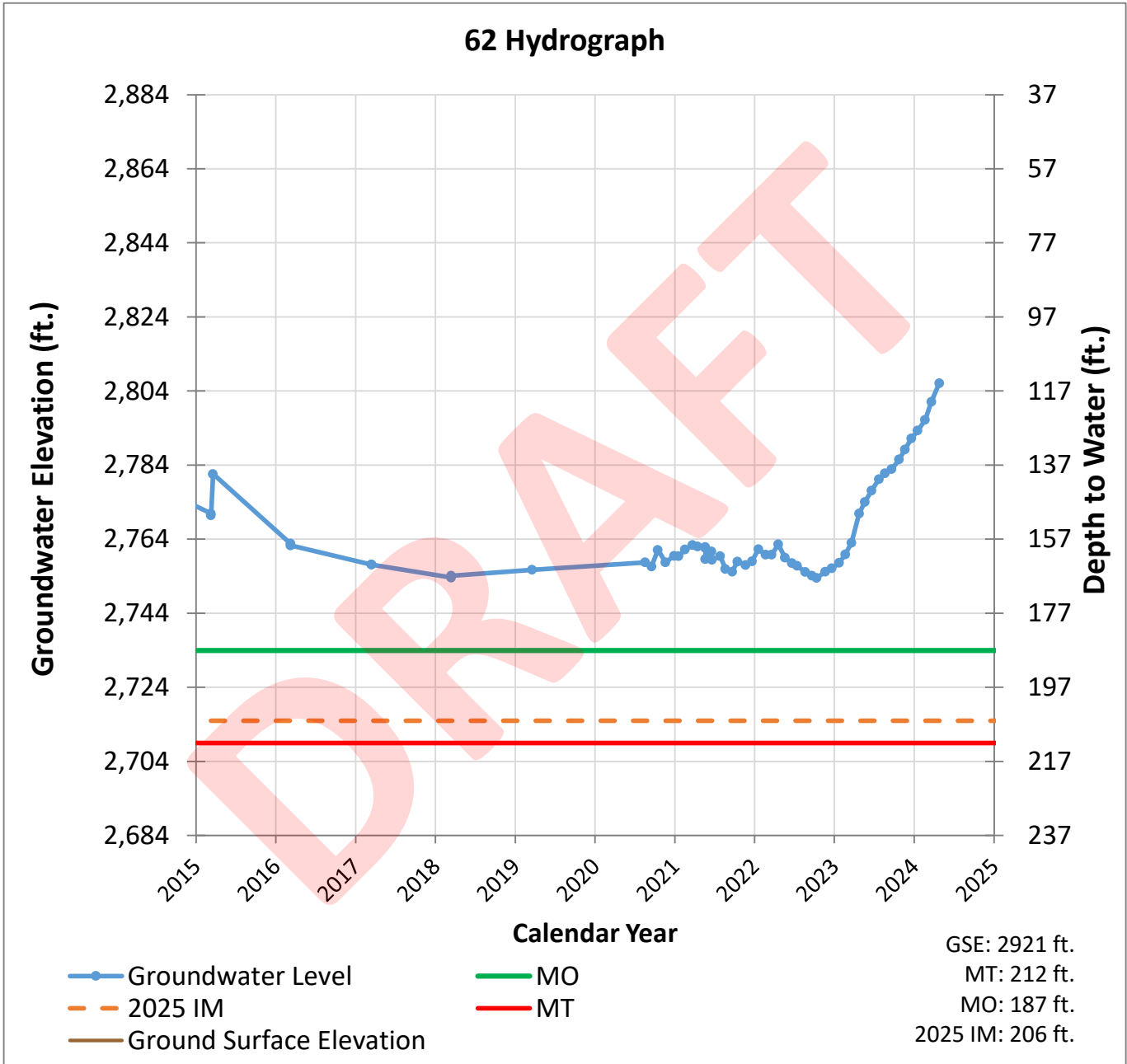
**Appendix A**  
**Updated Hydrographs for Representative Wells**

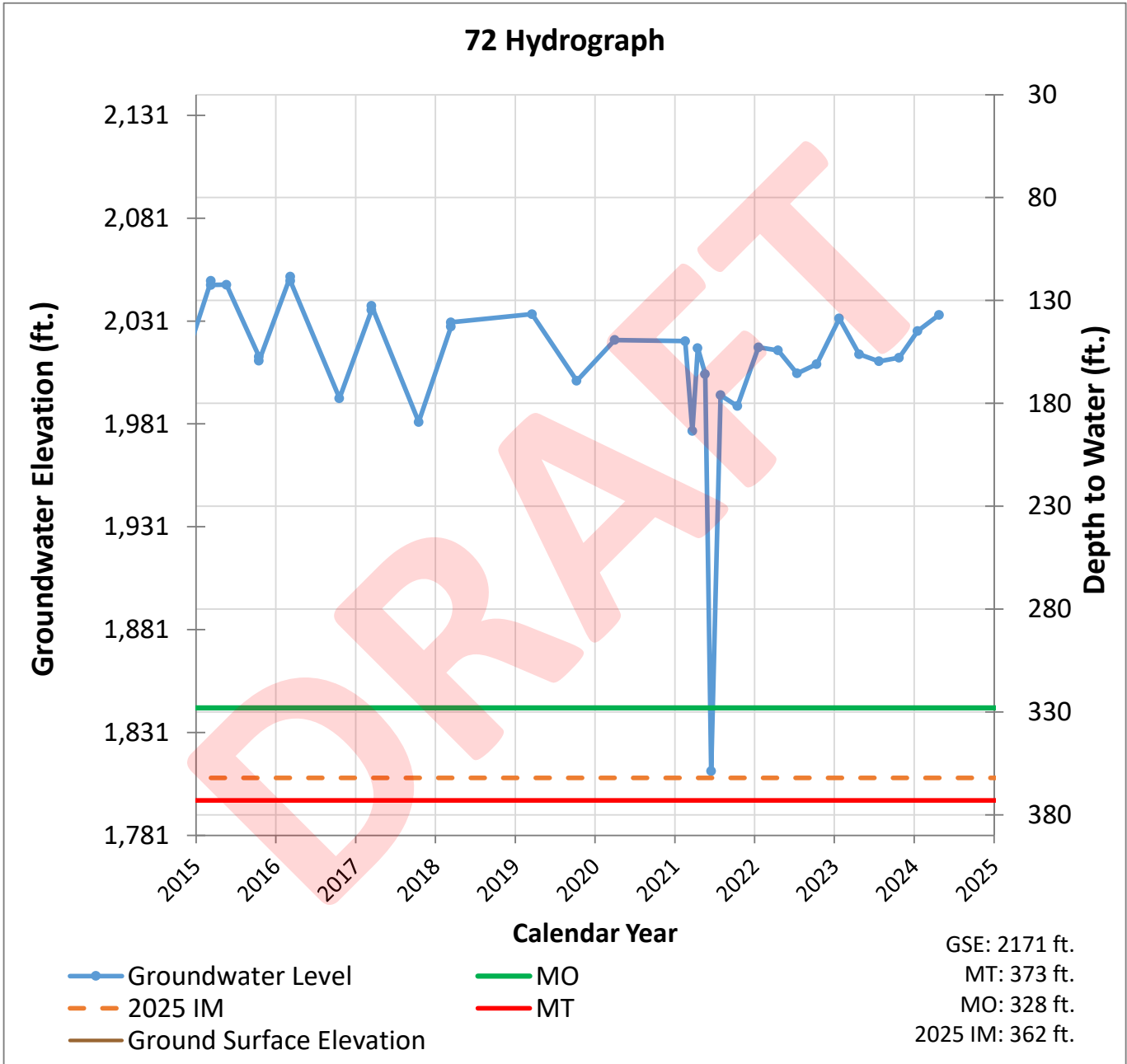
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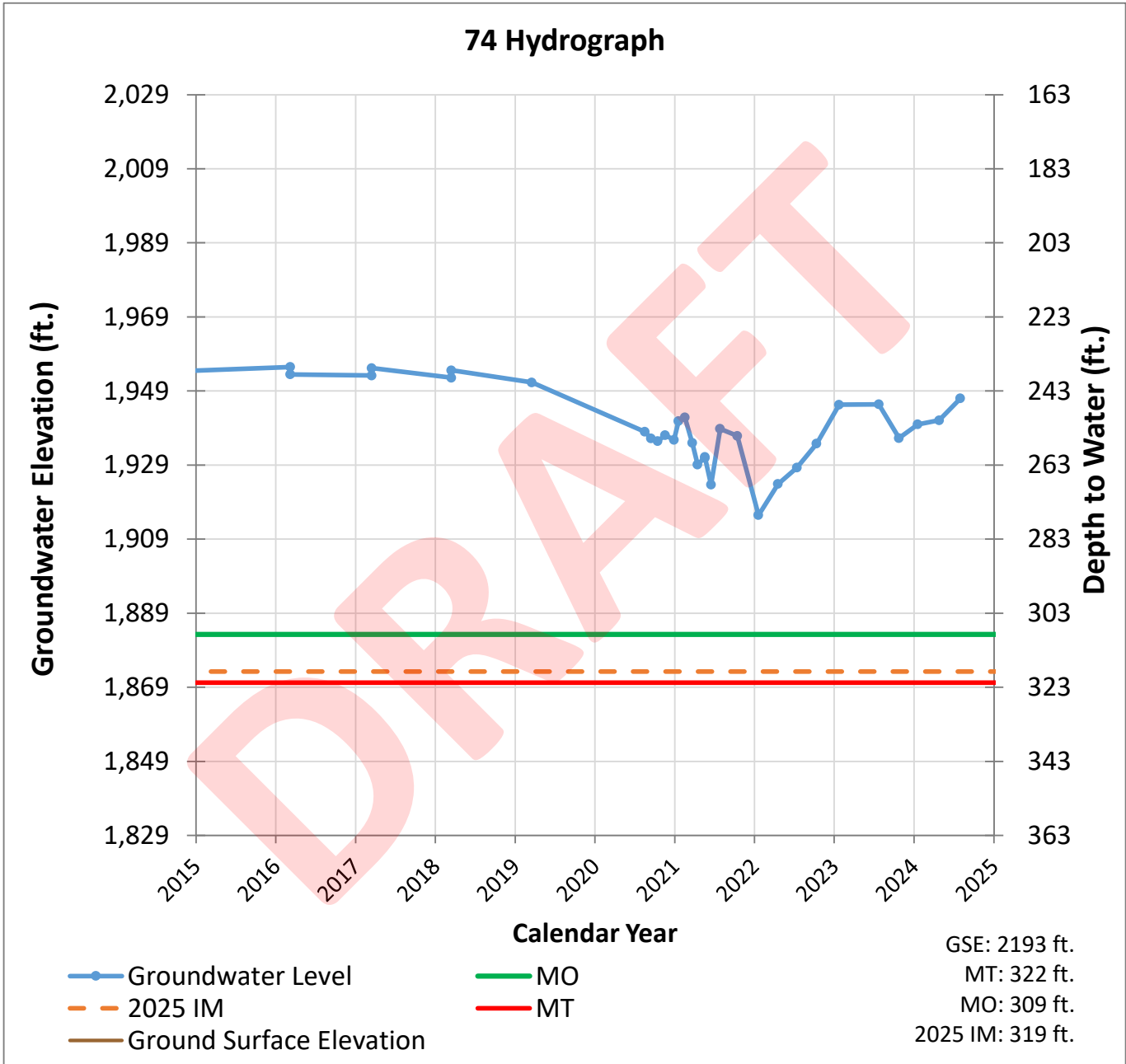
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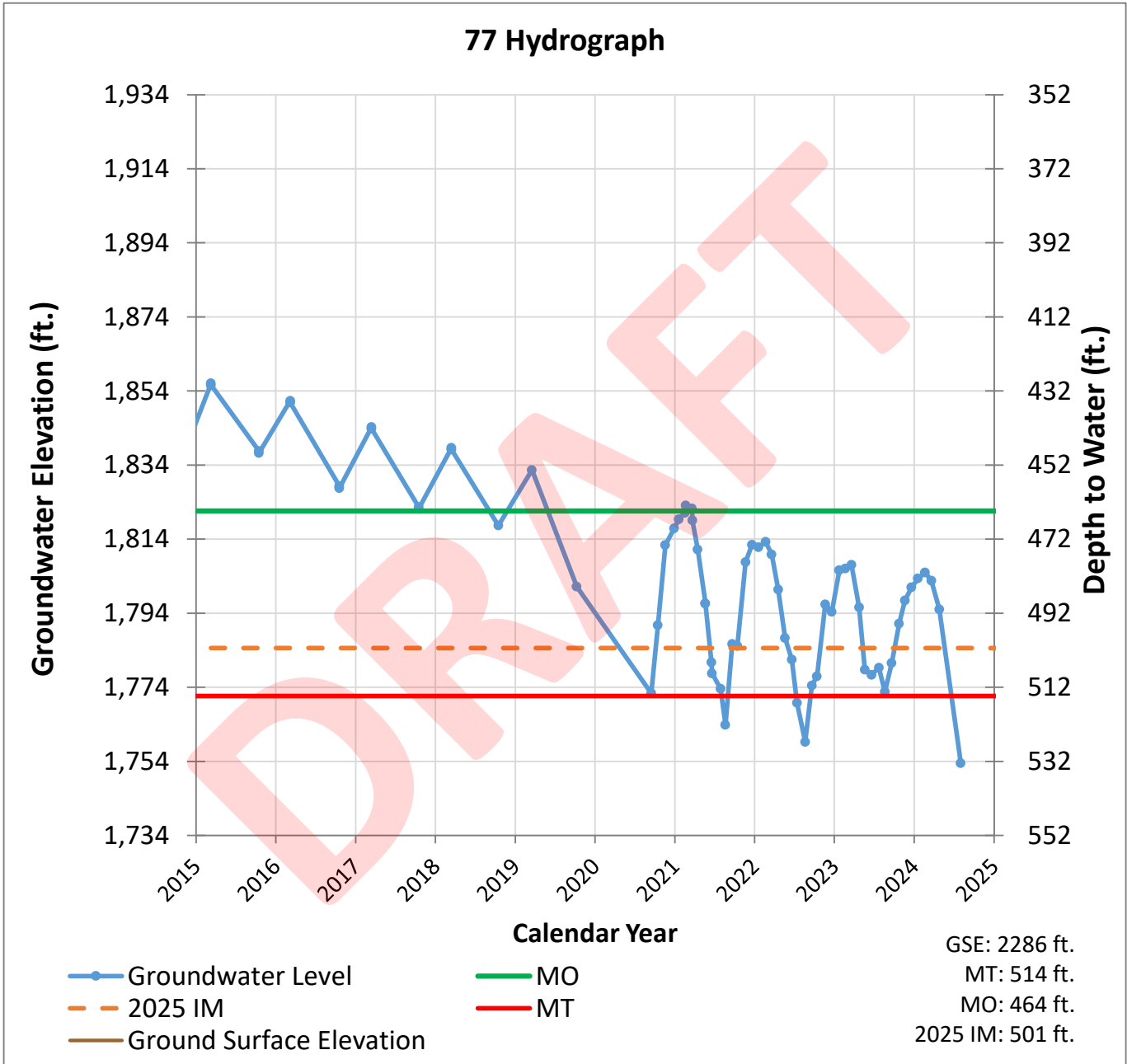


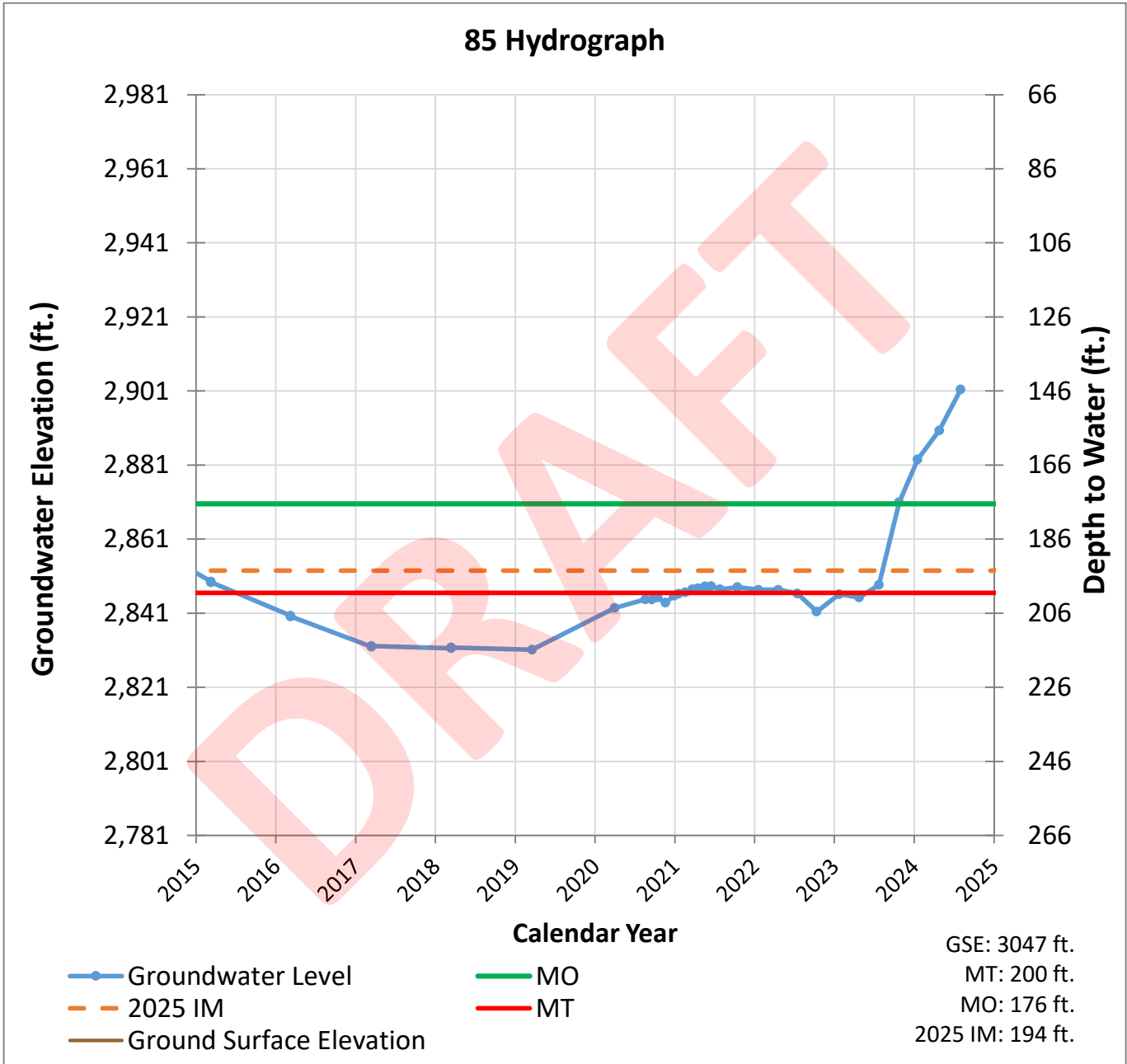


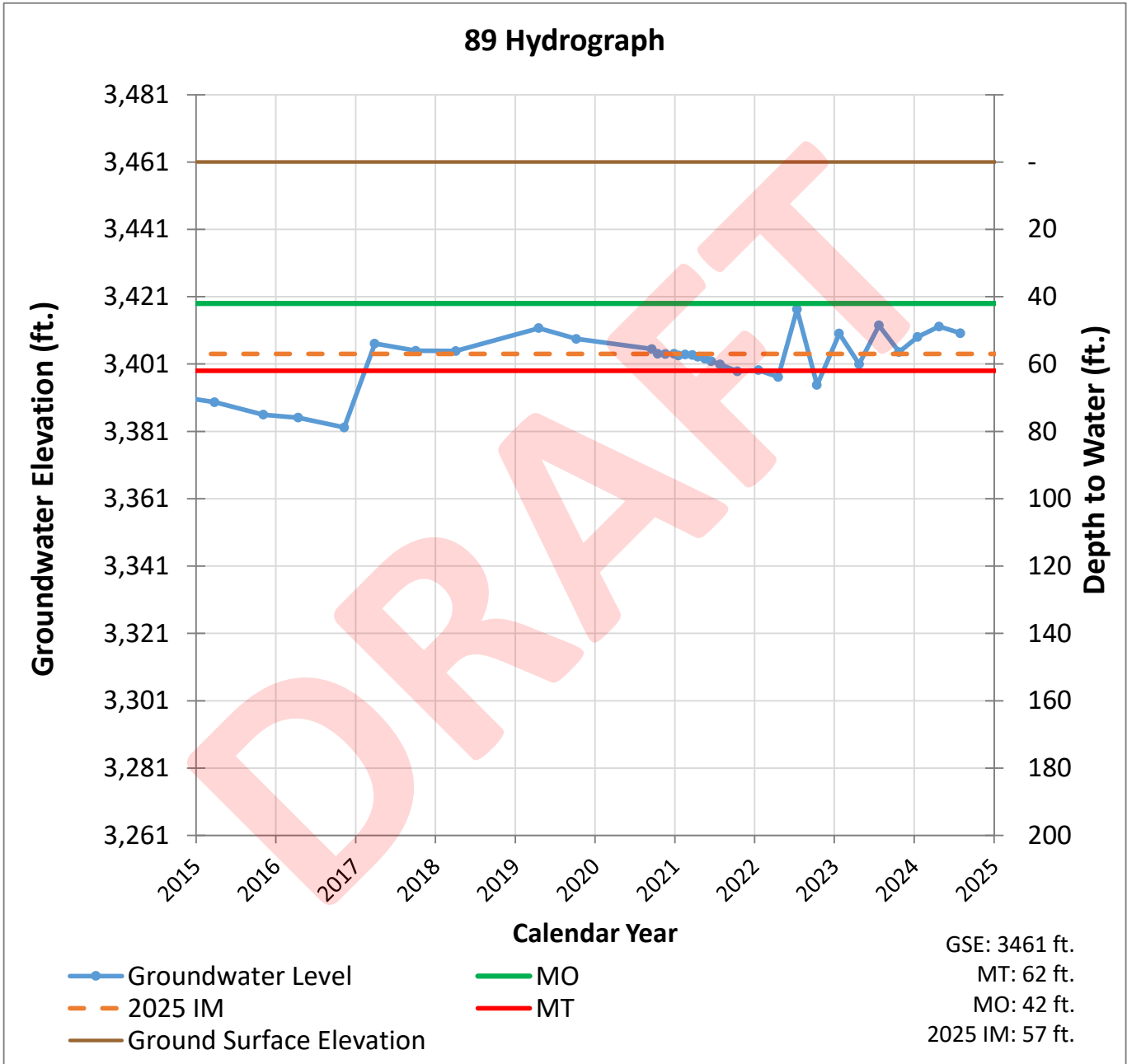


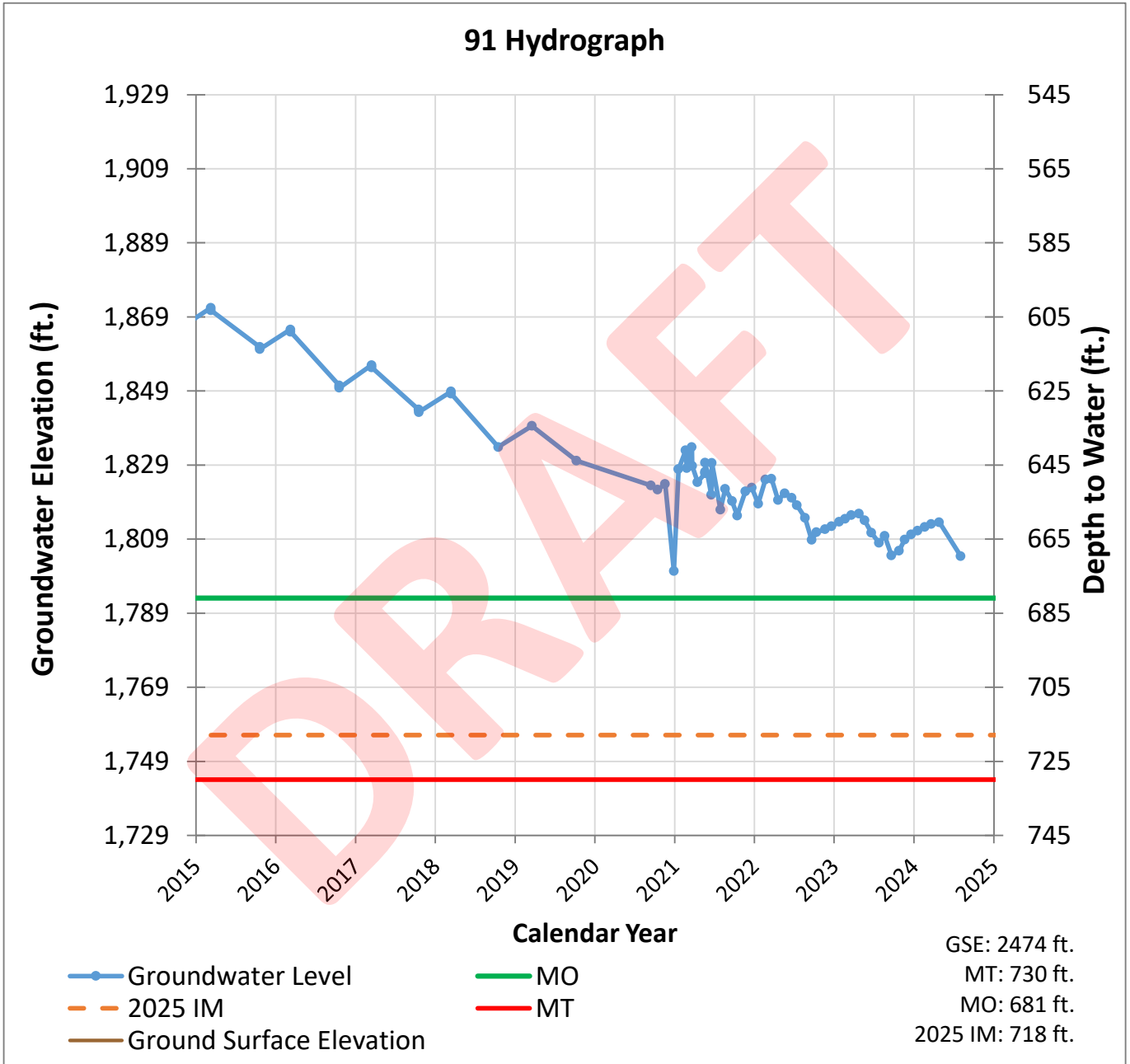




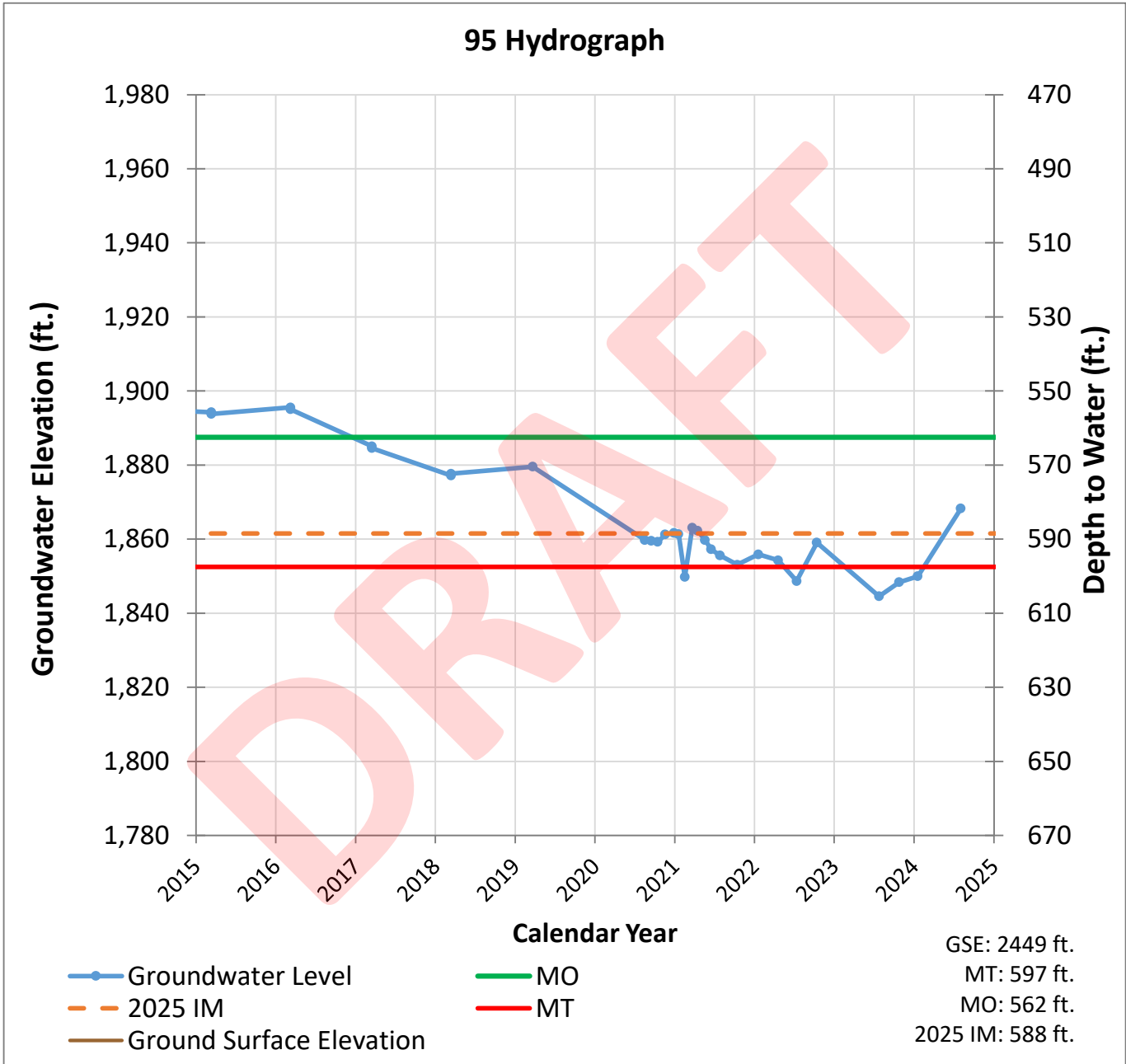


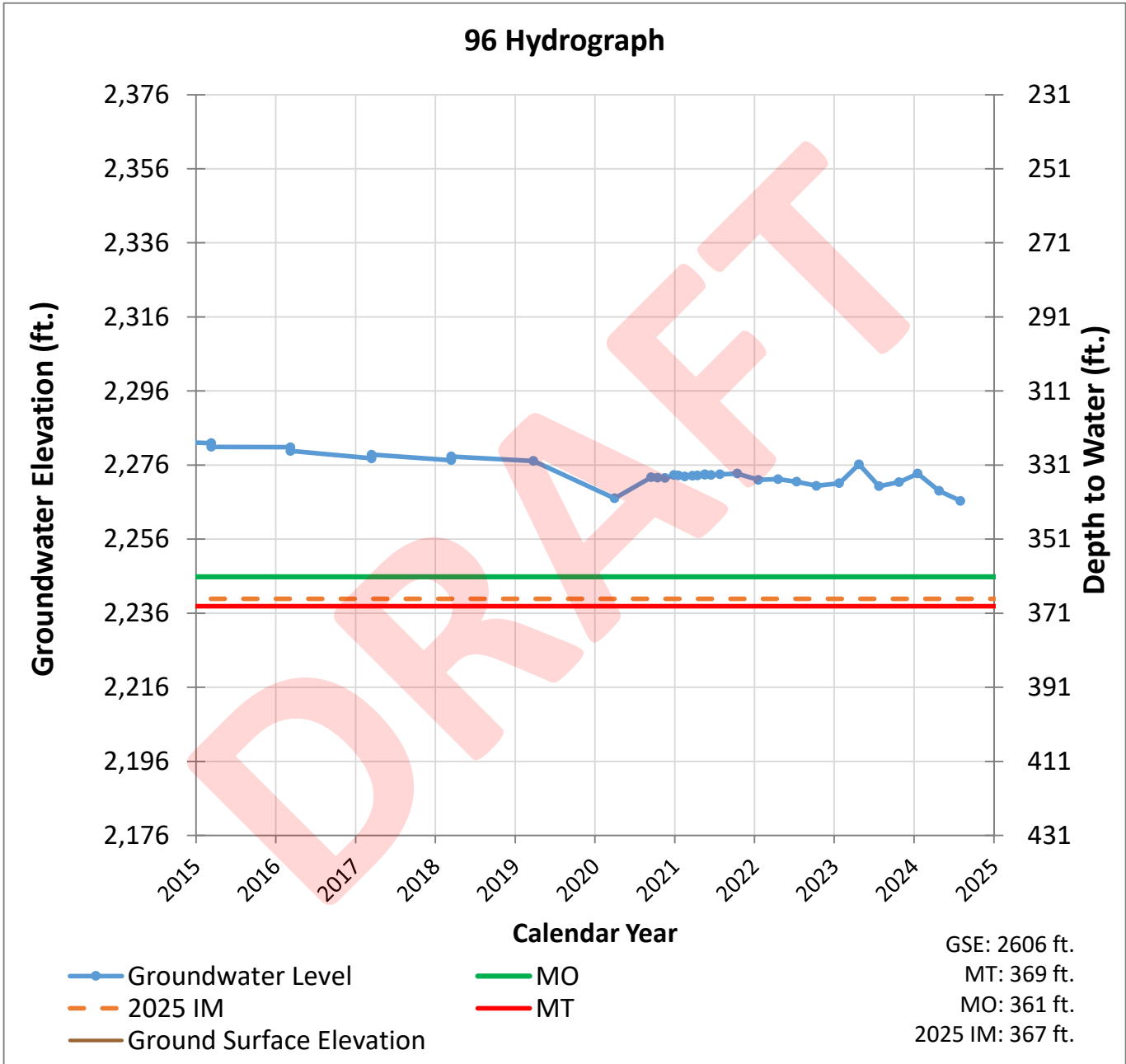


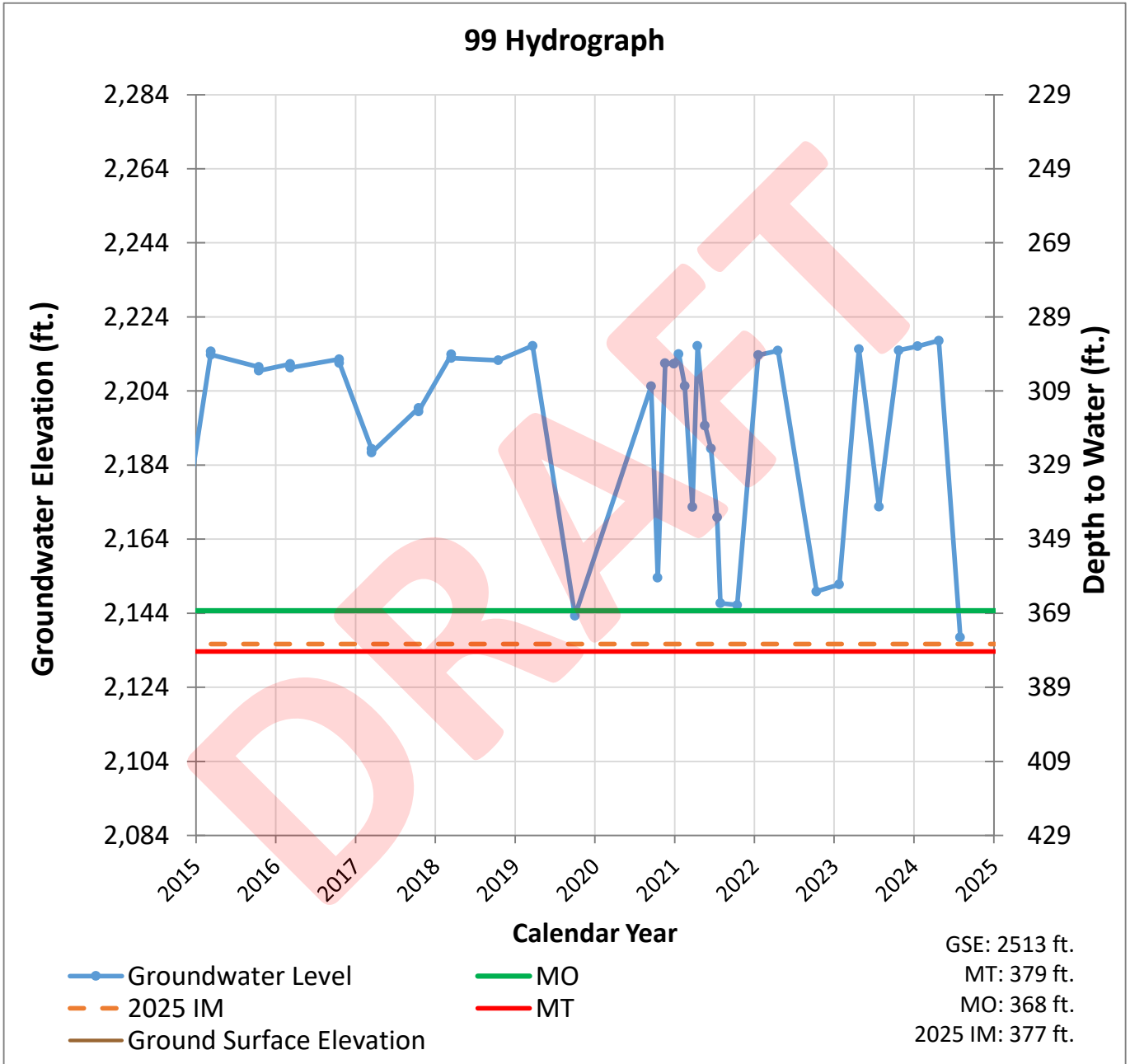


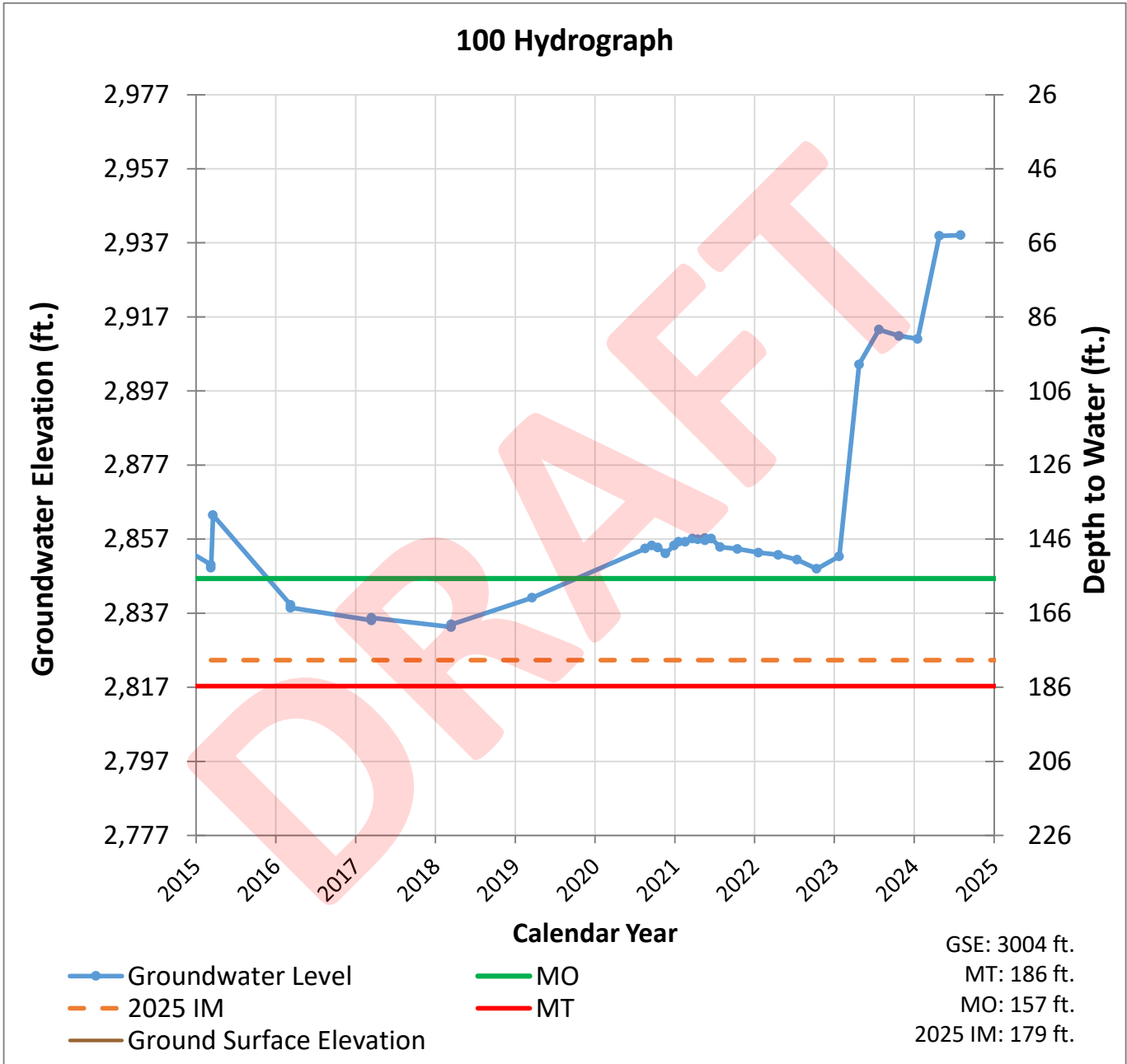




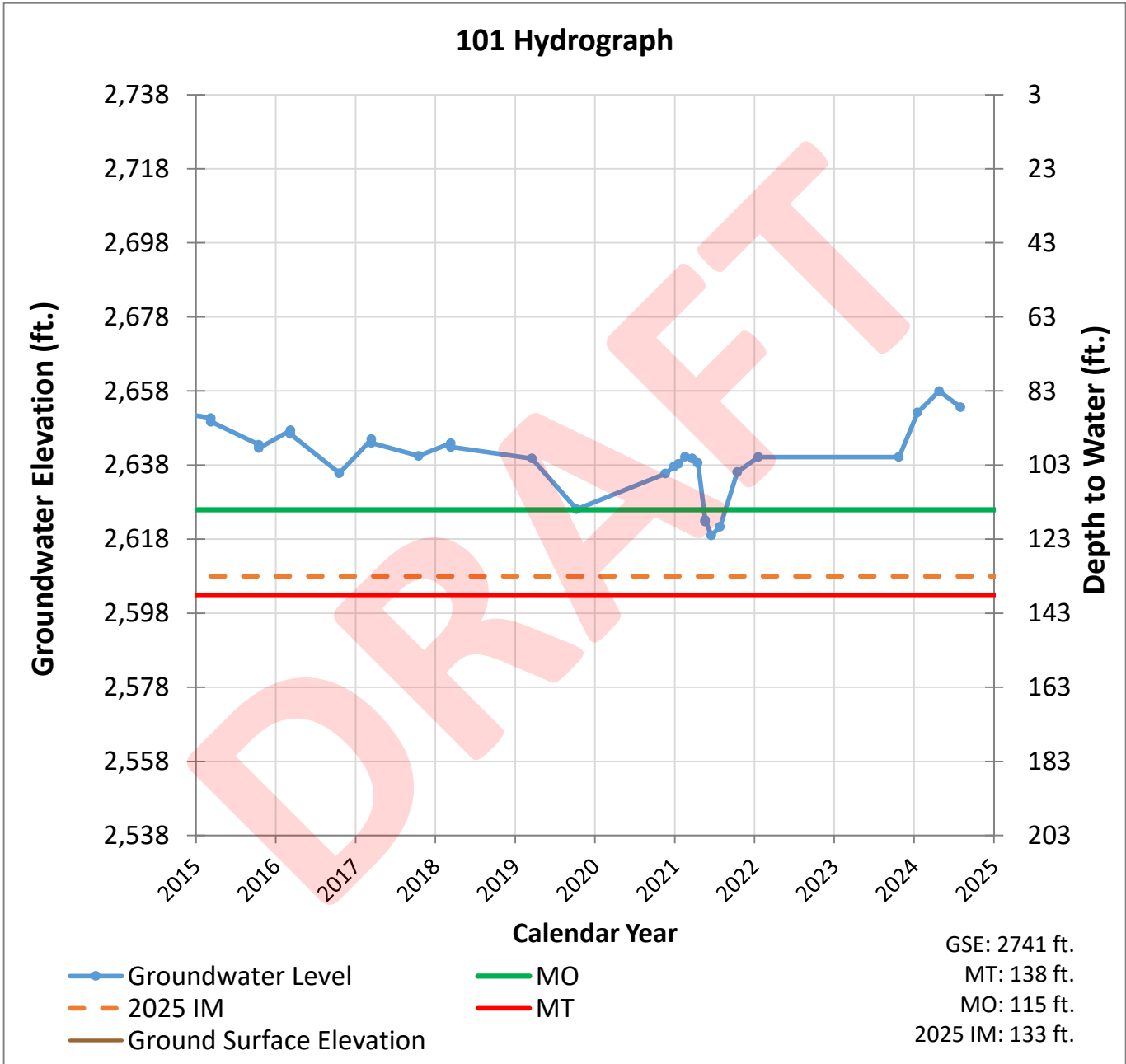


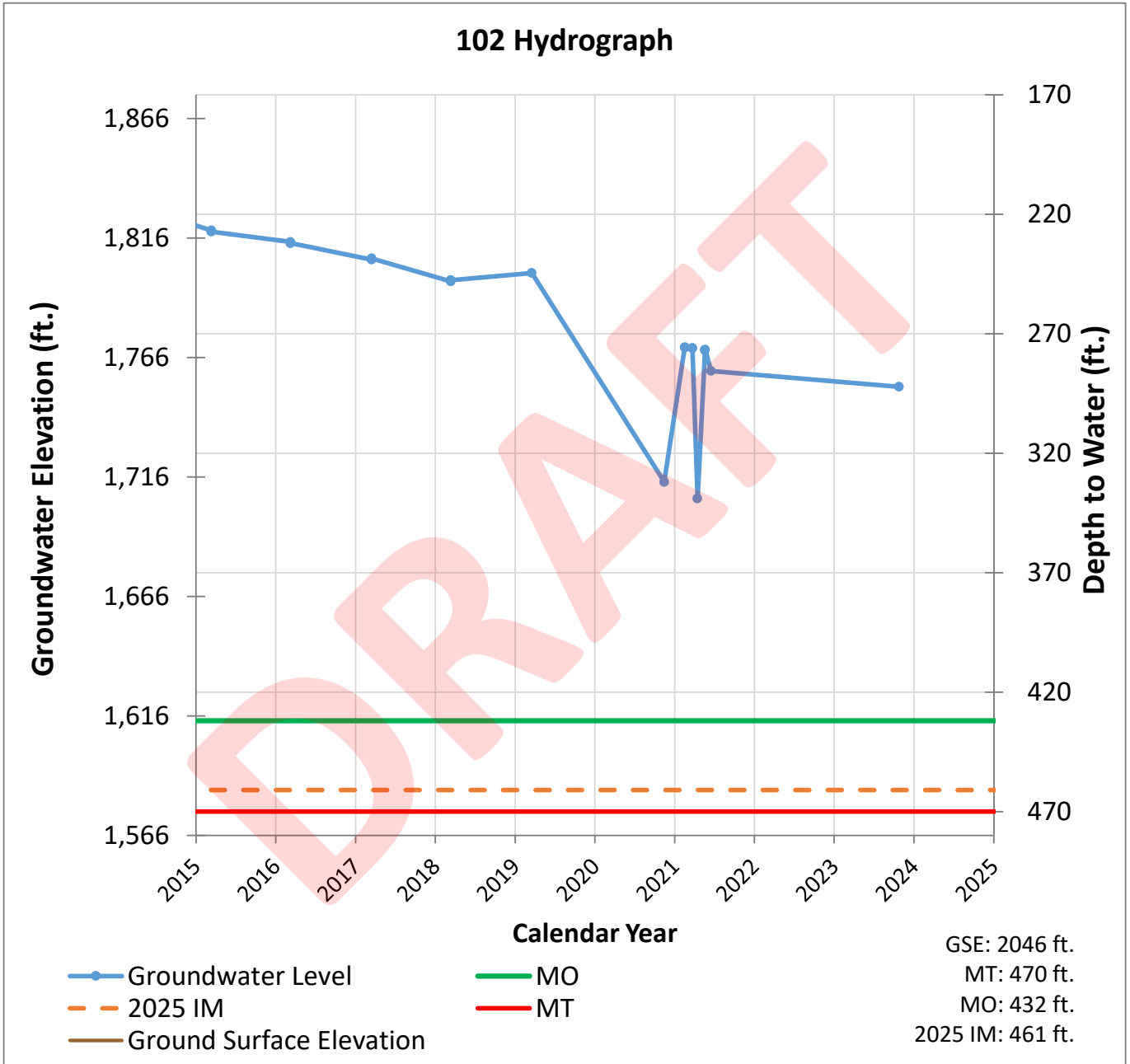


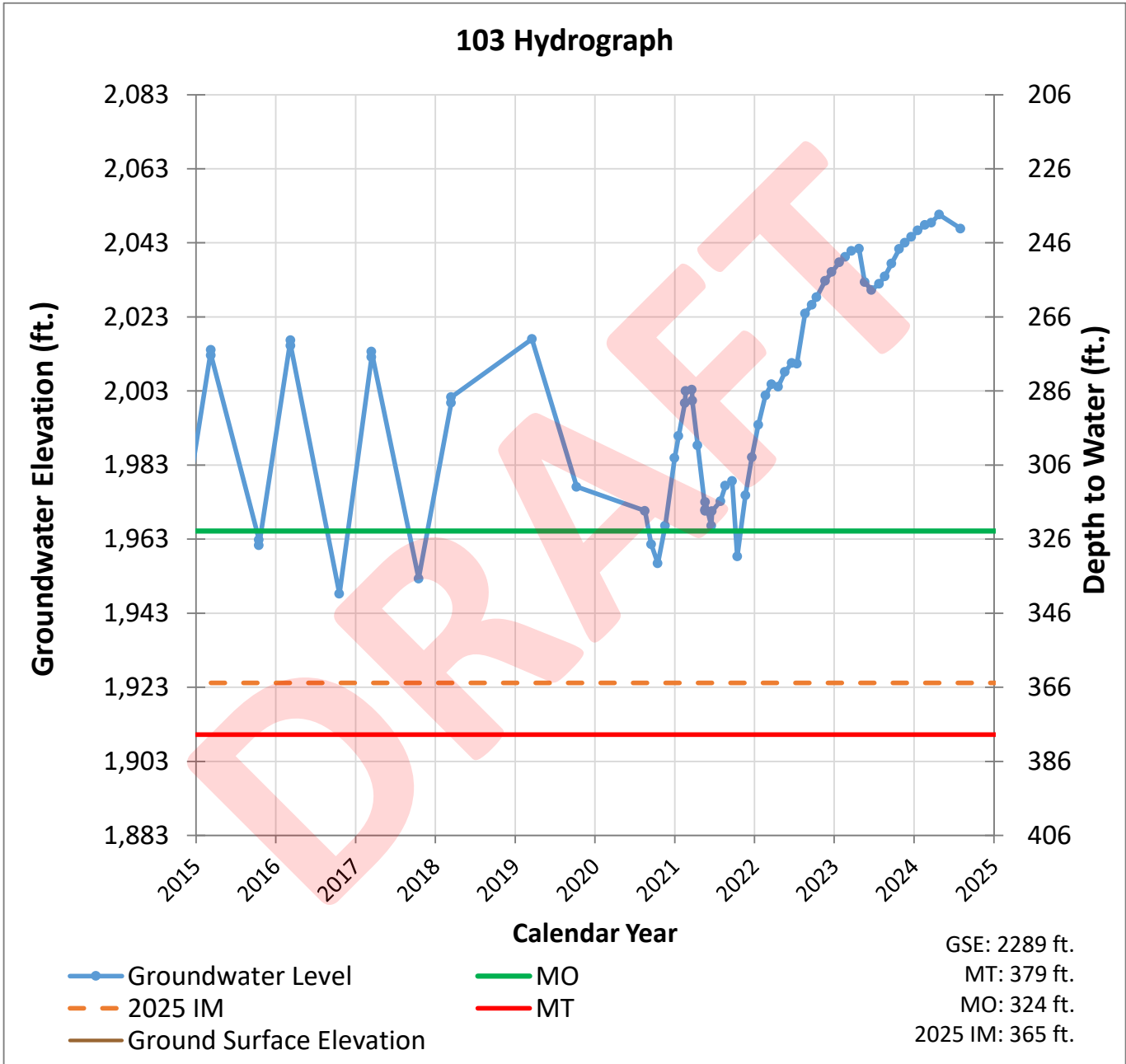


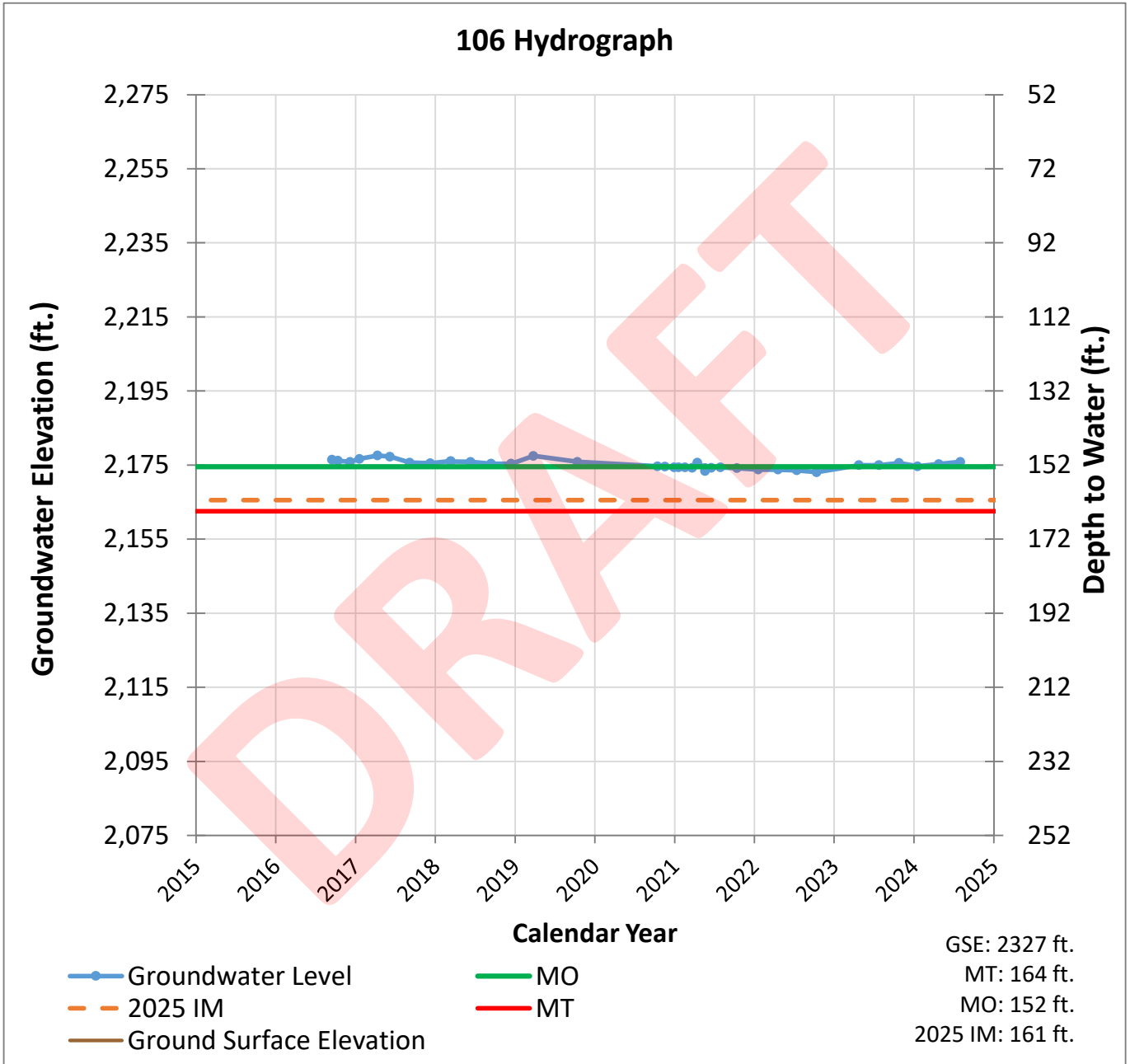




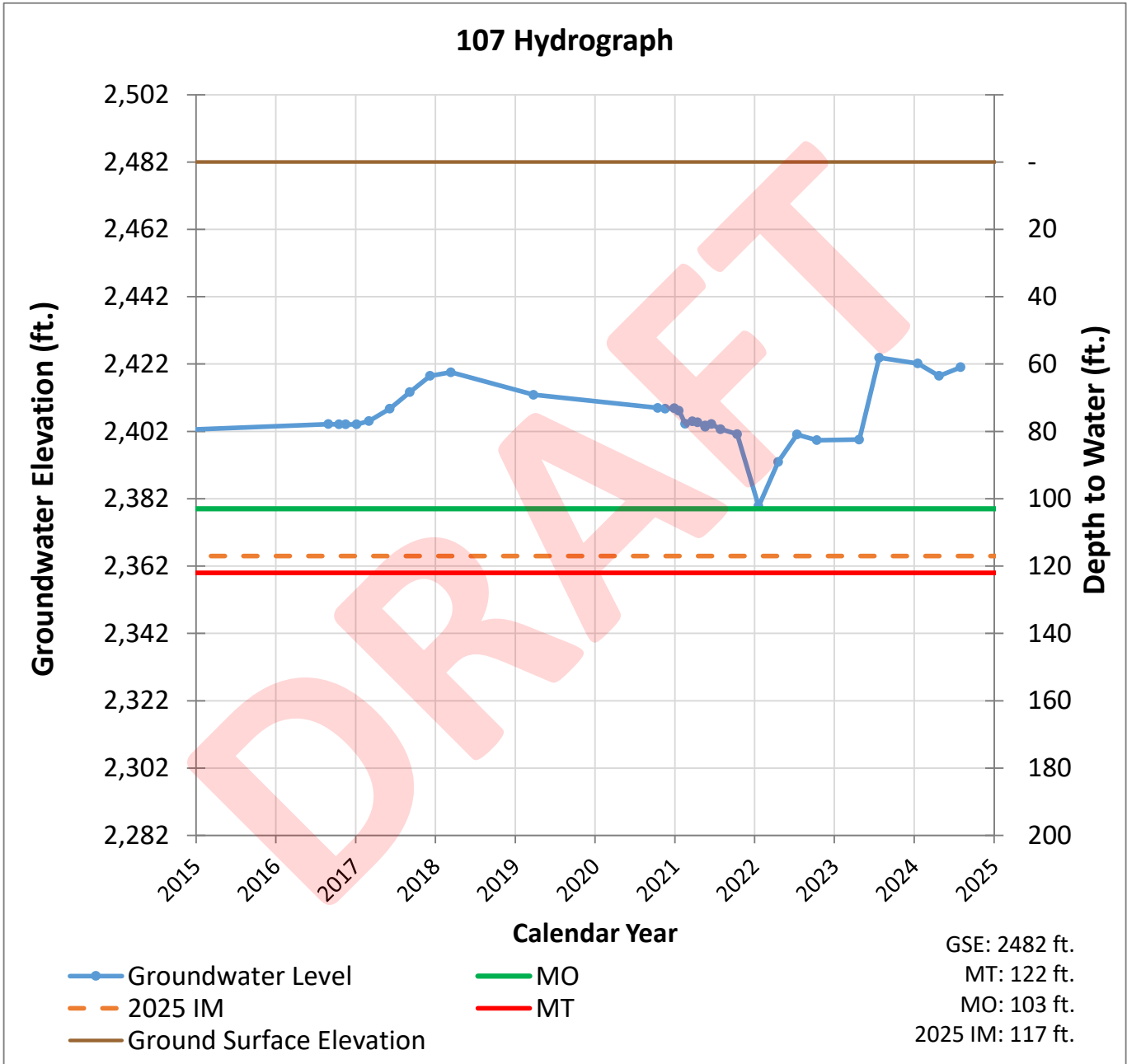


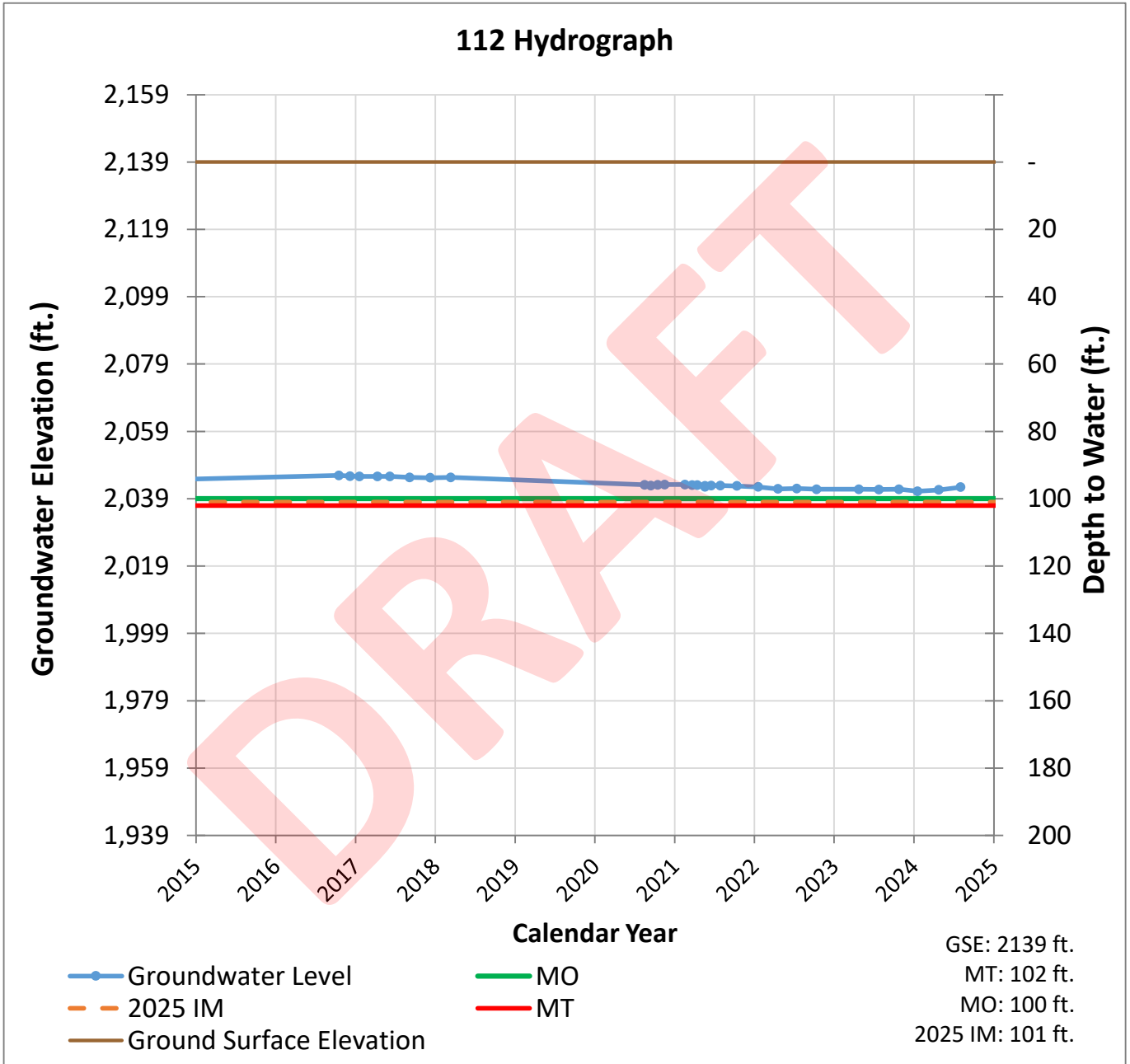


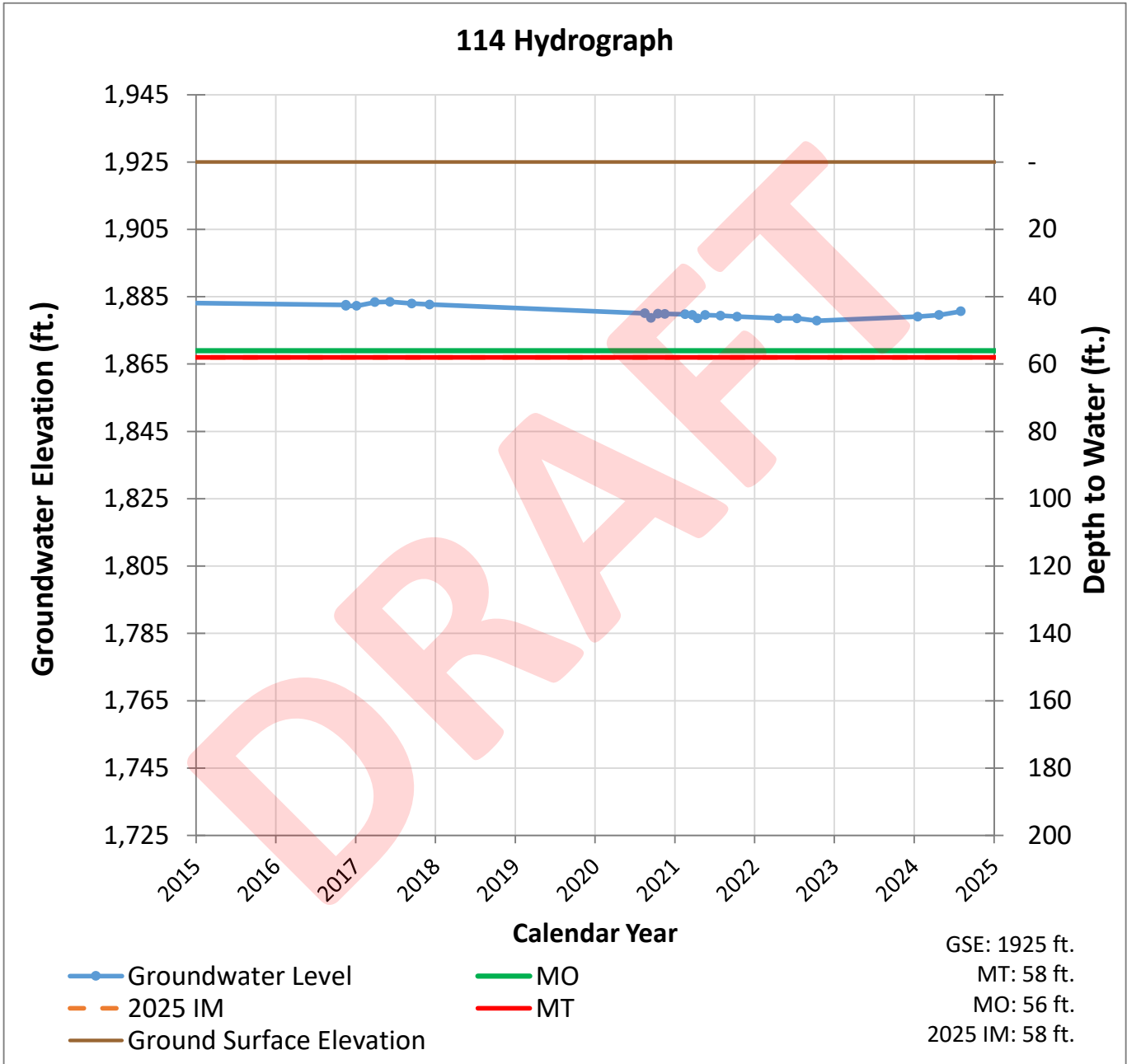


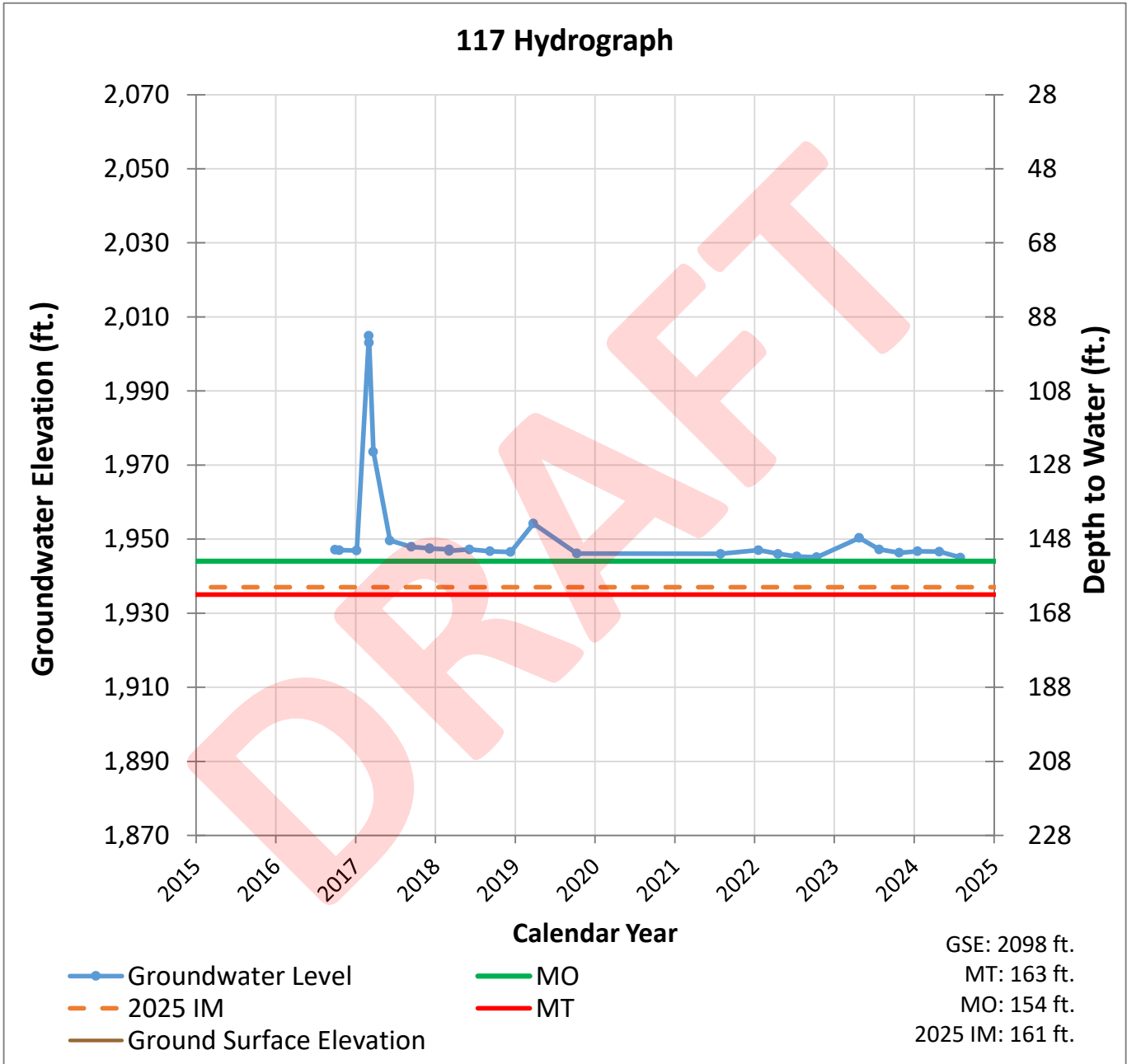




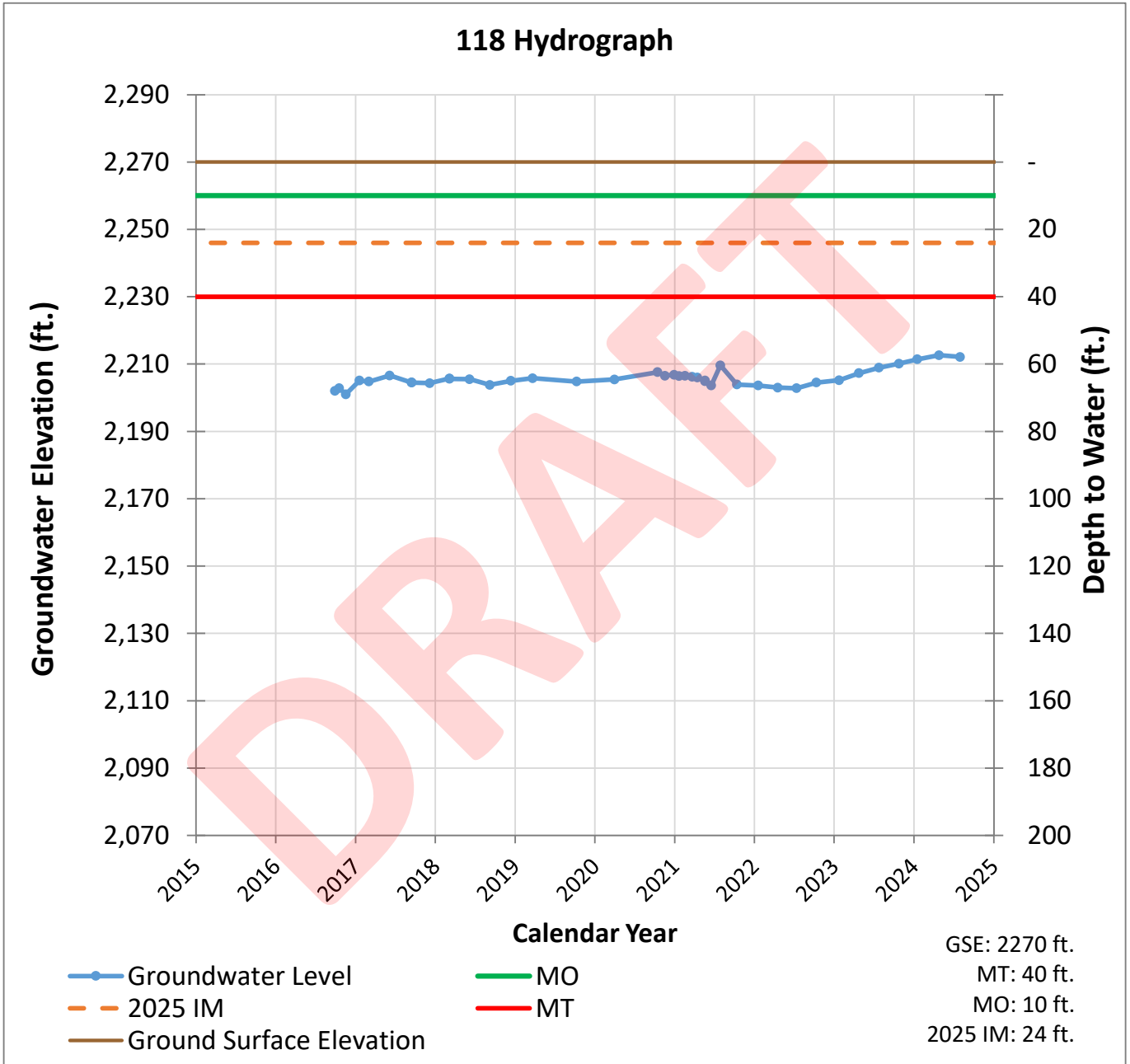


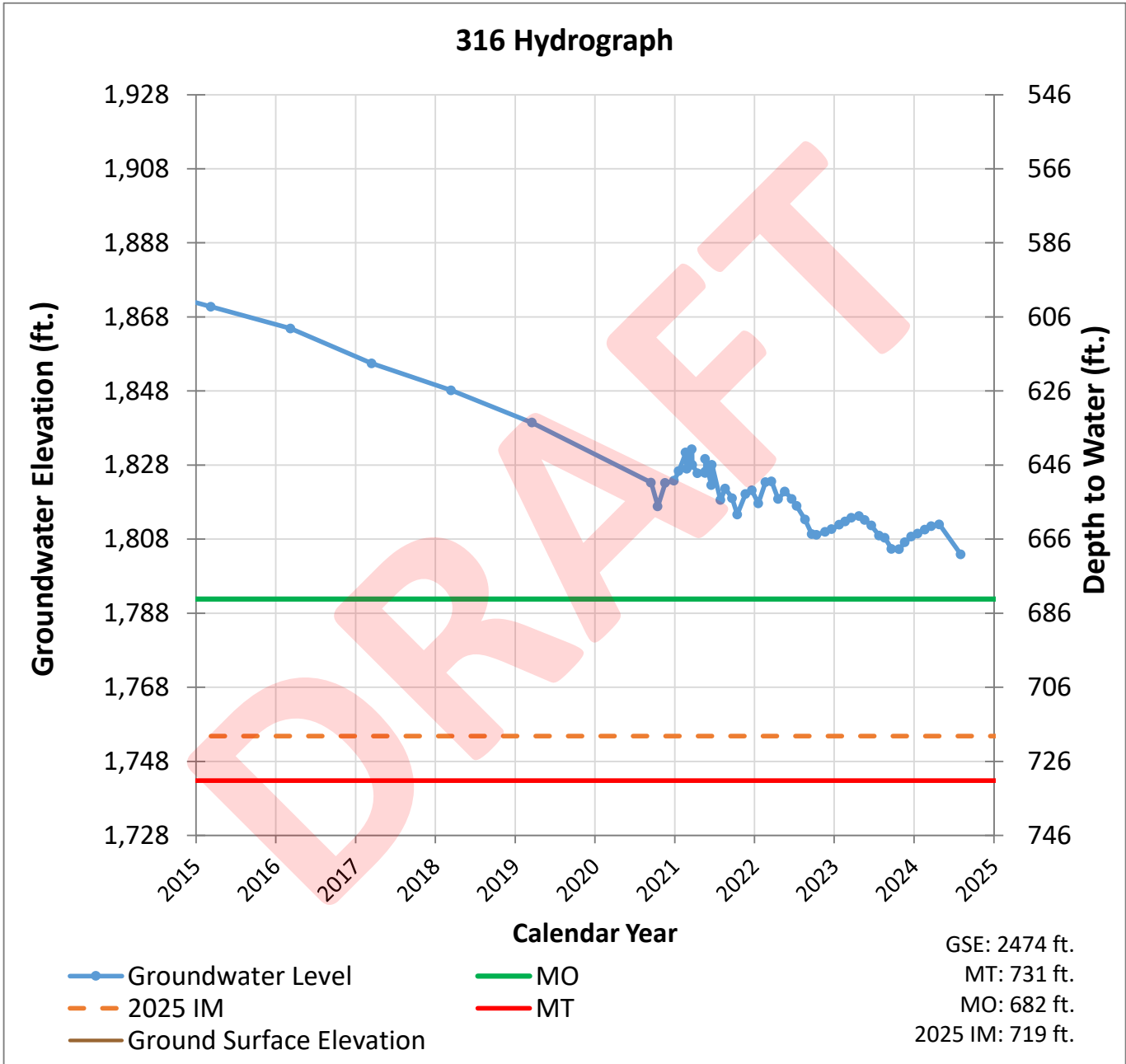


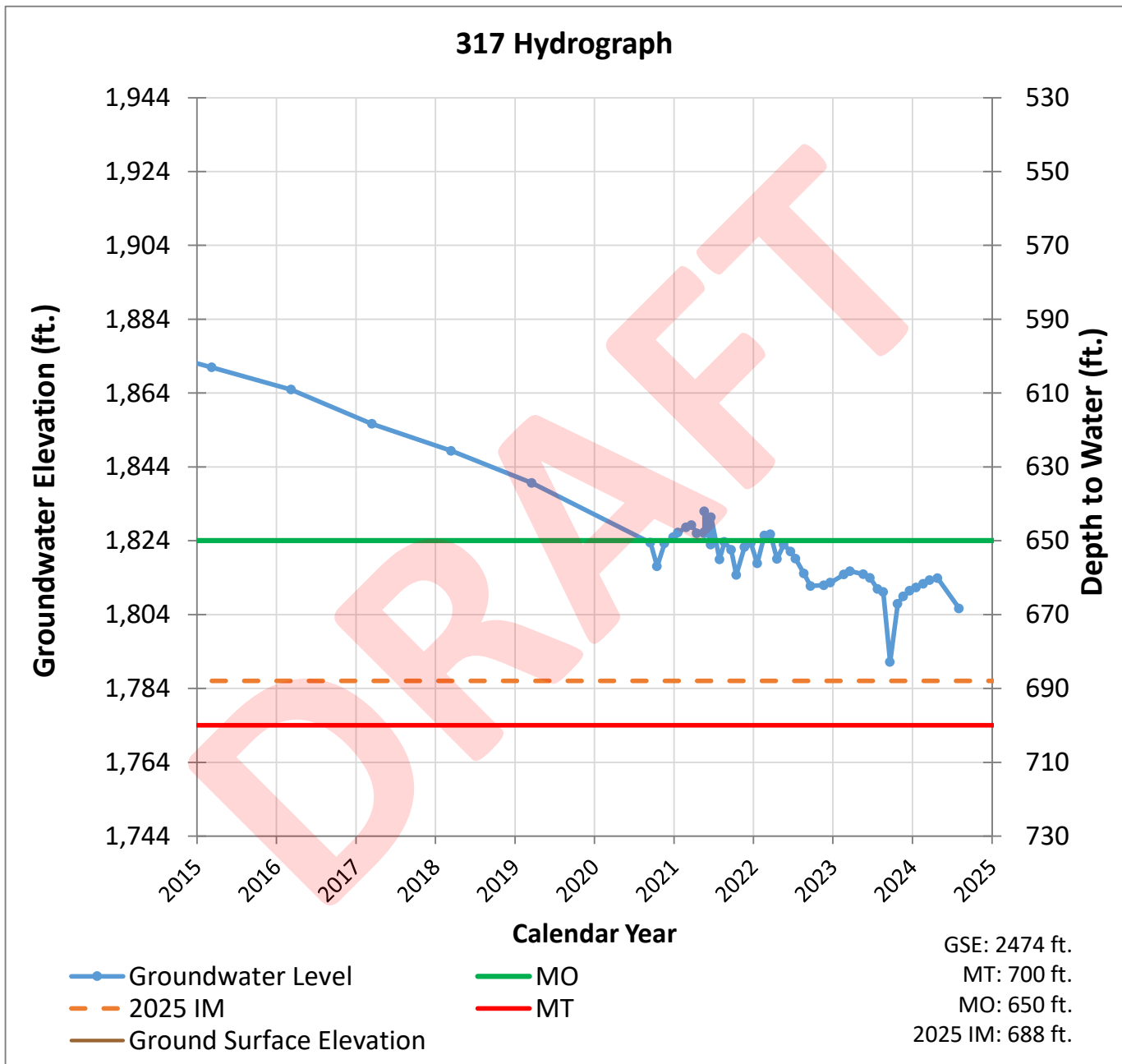


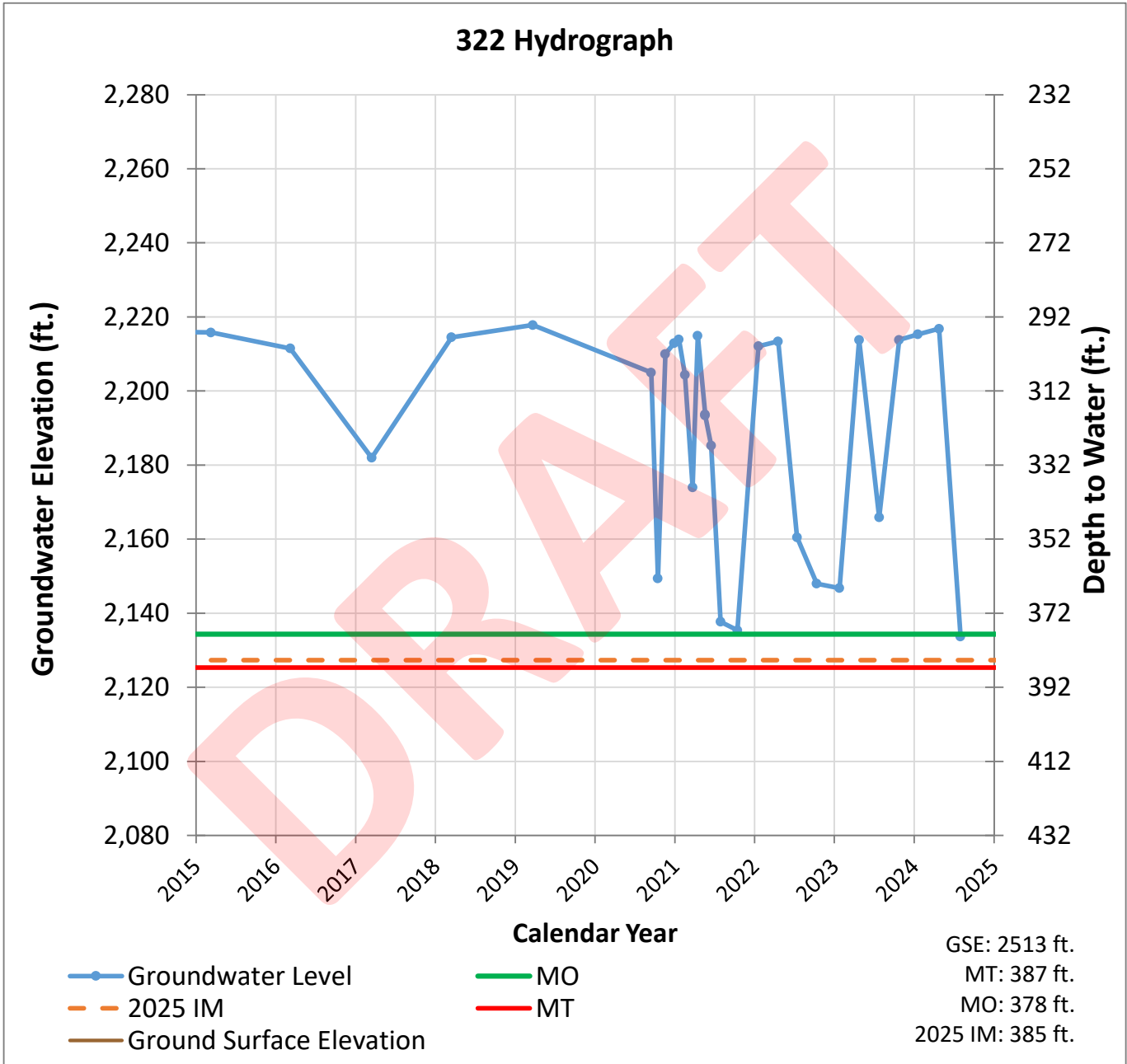




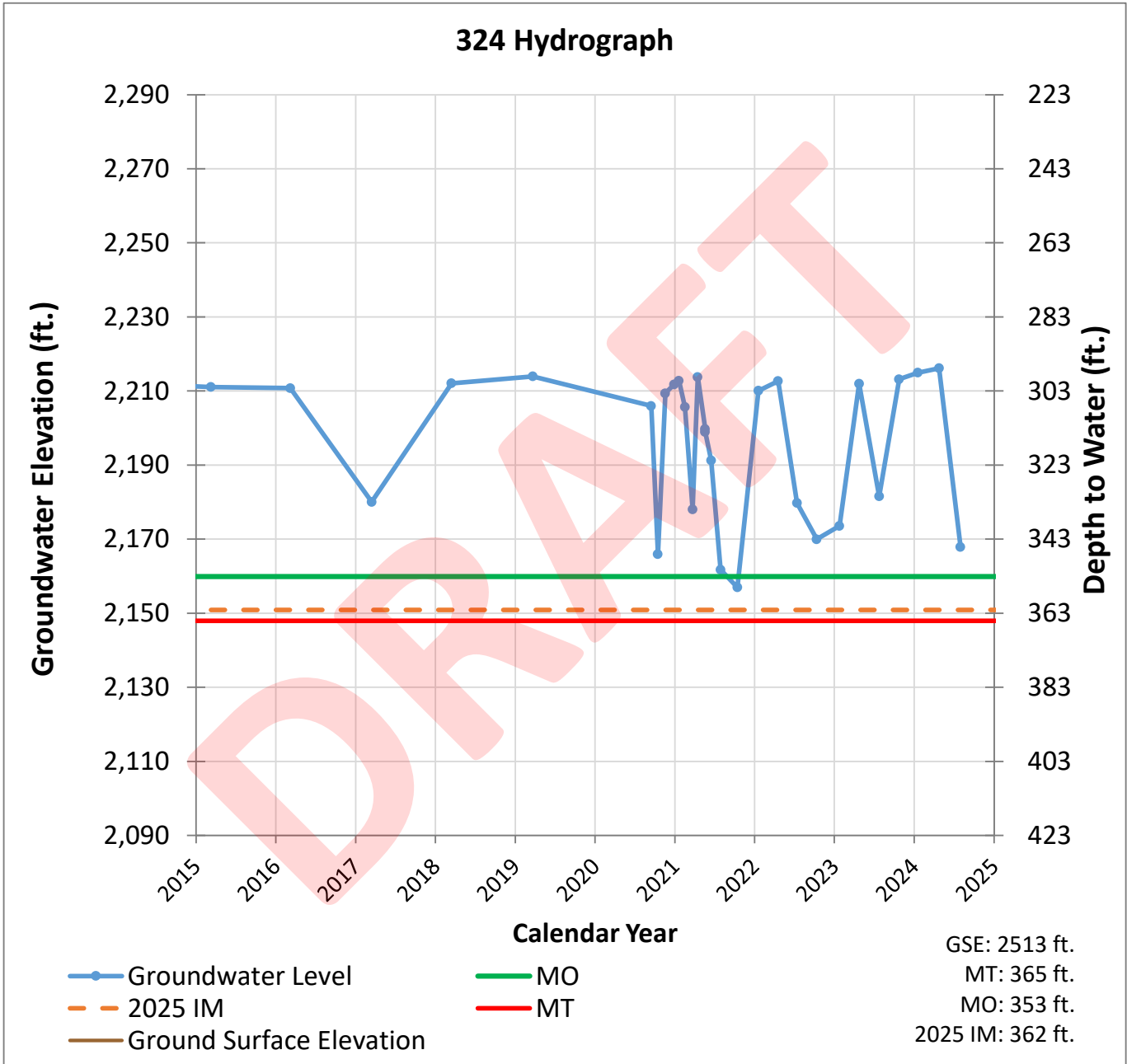


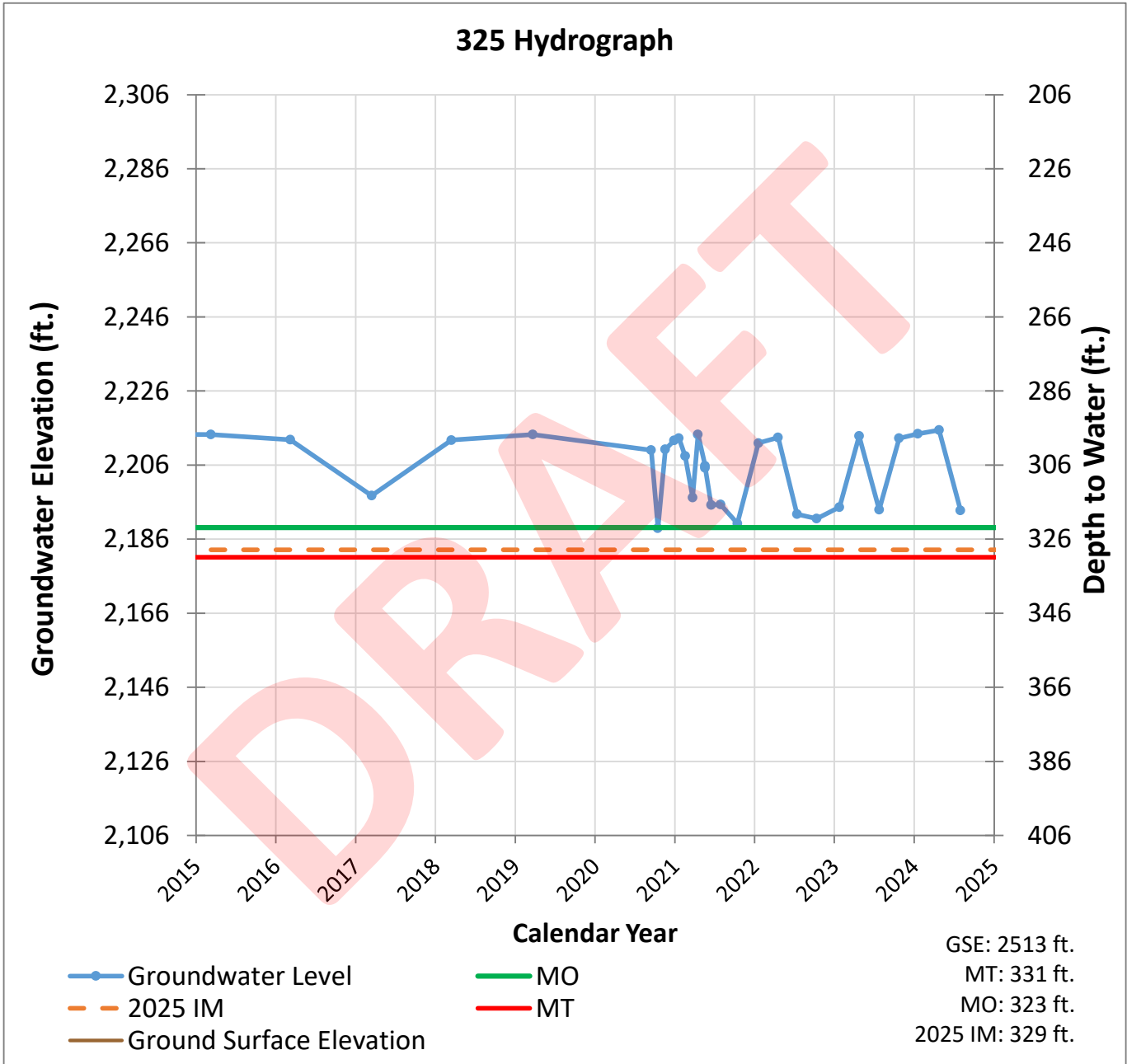


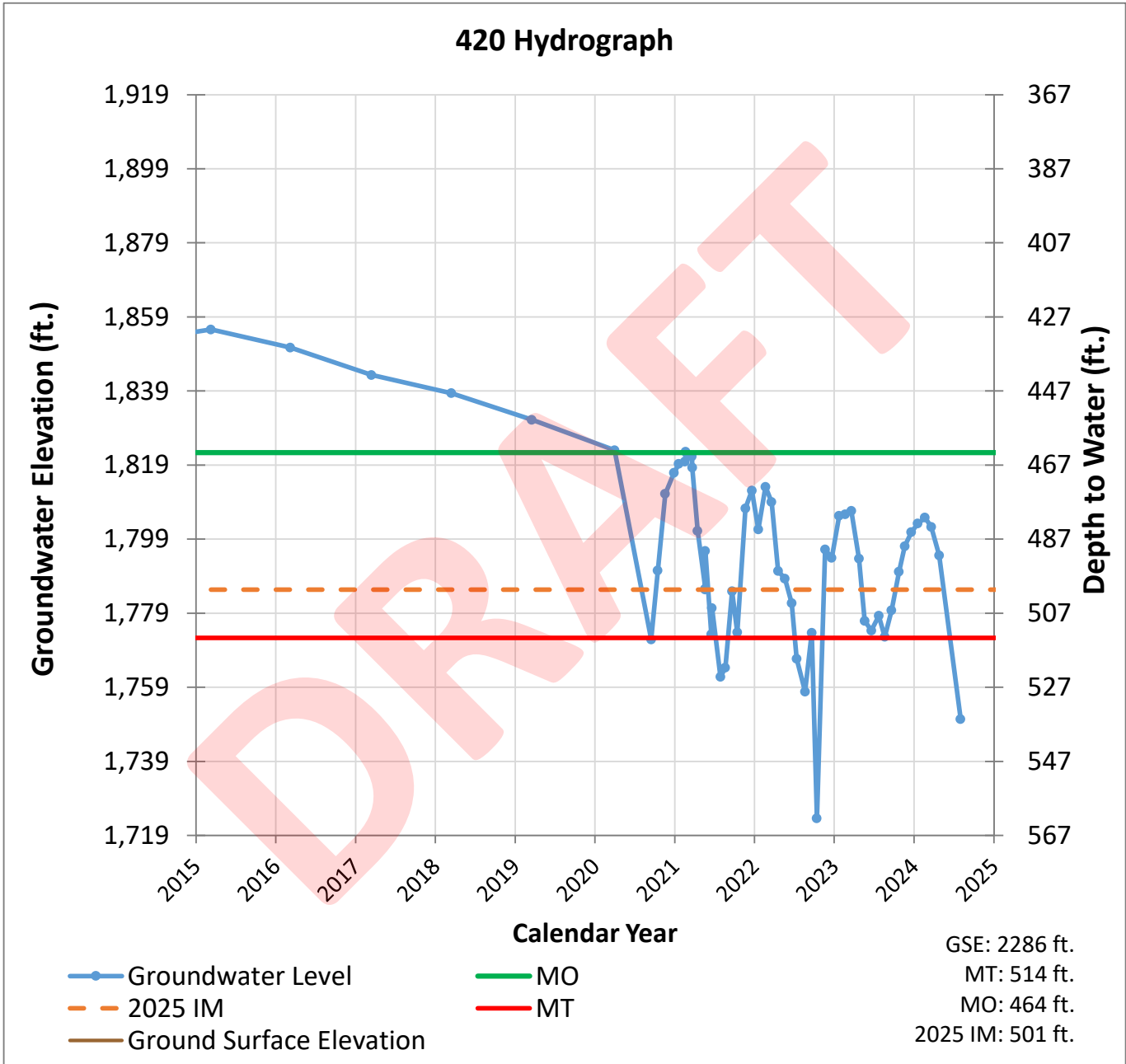


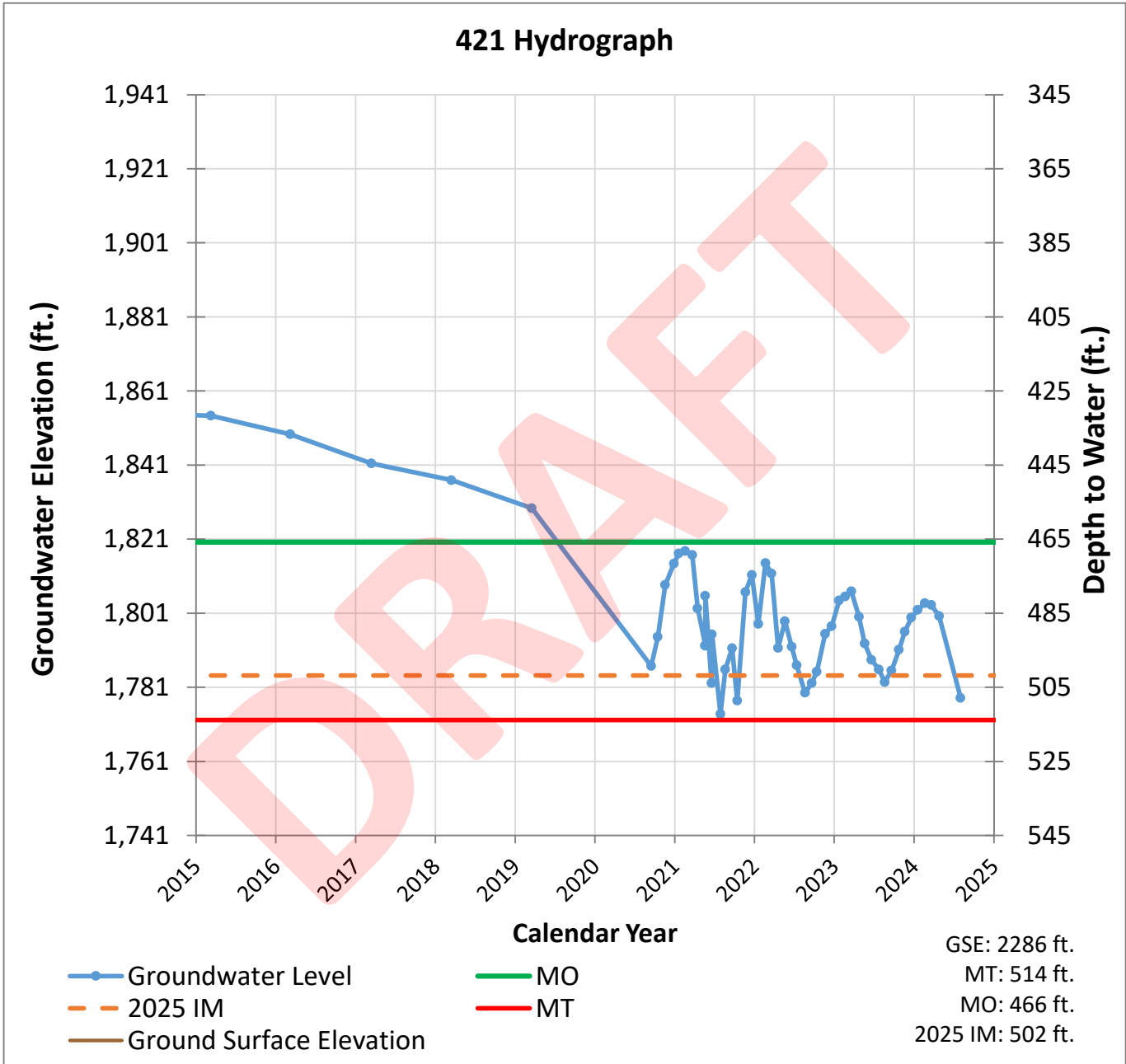




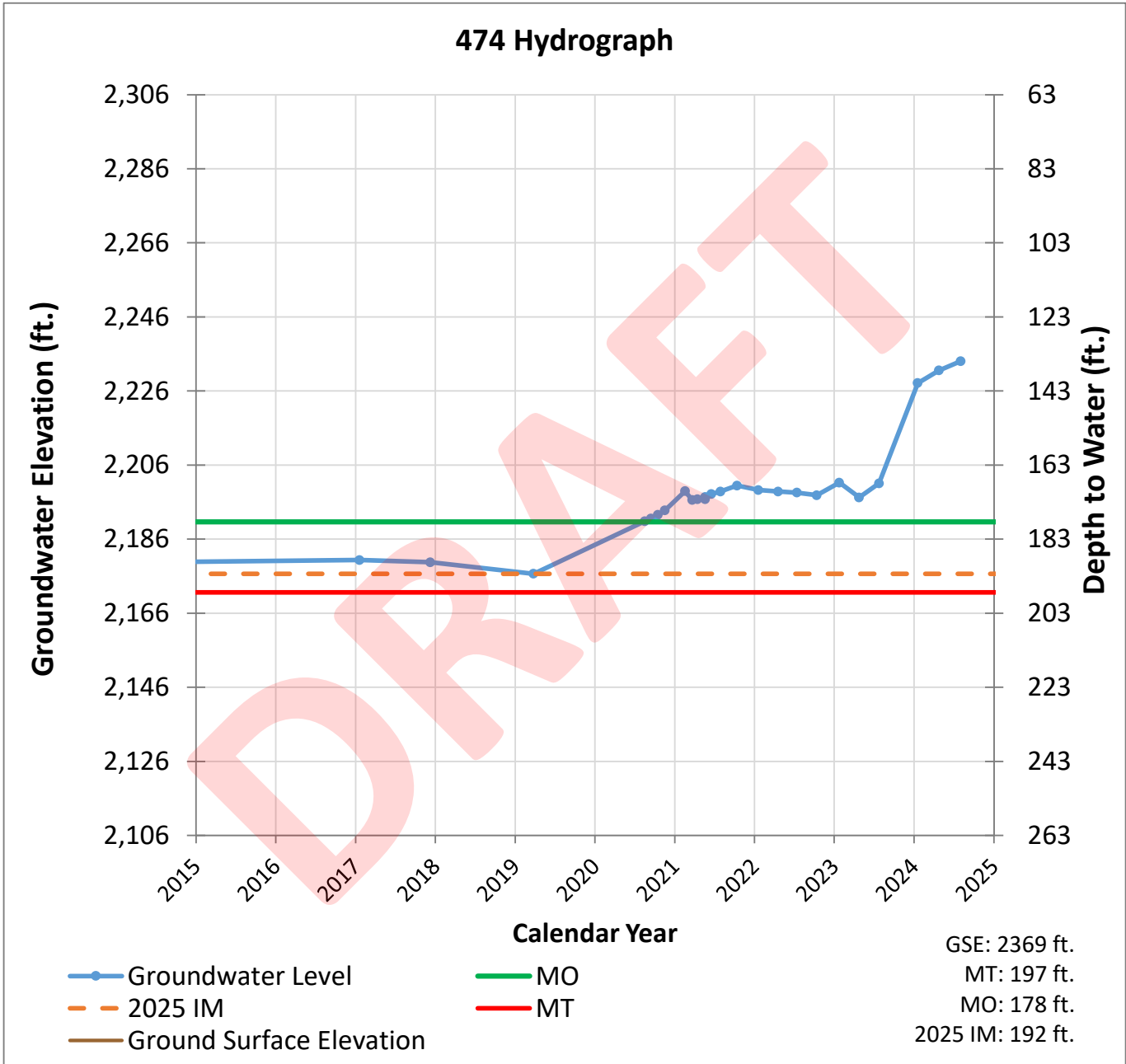


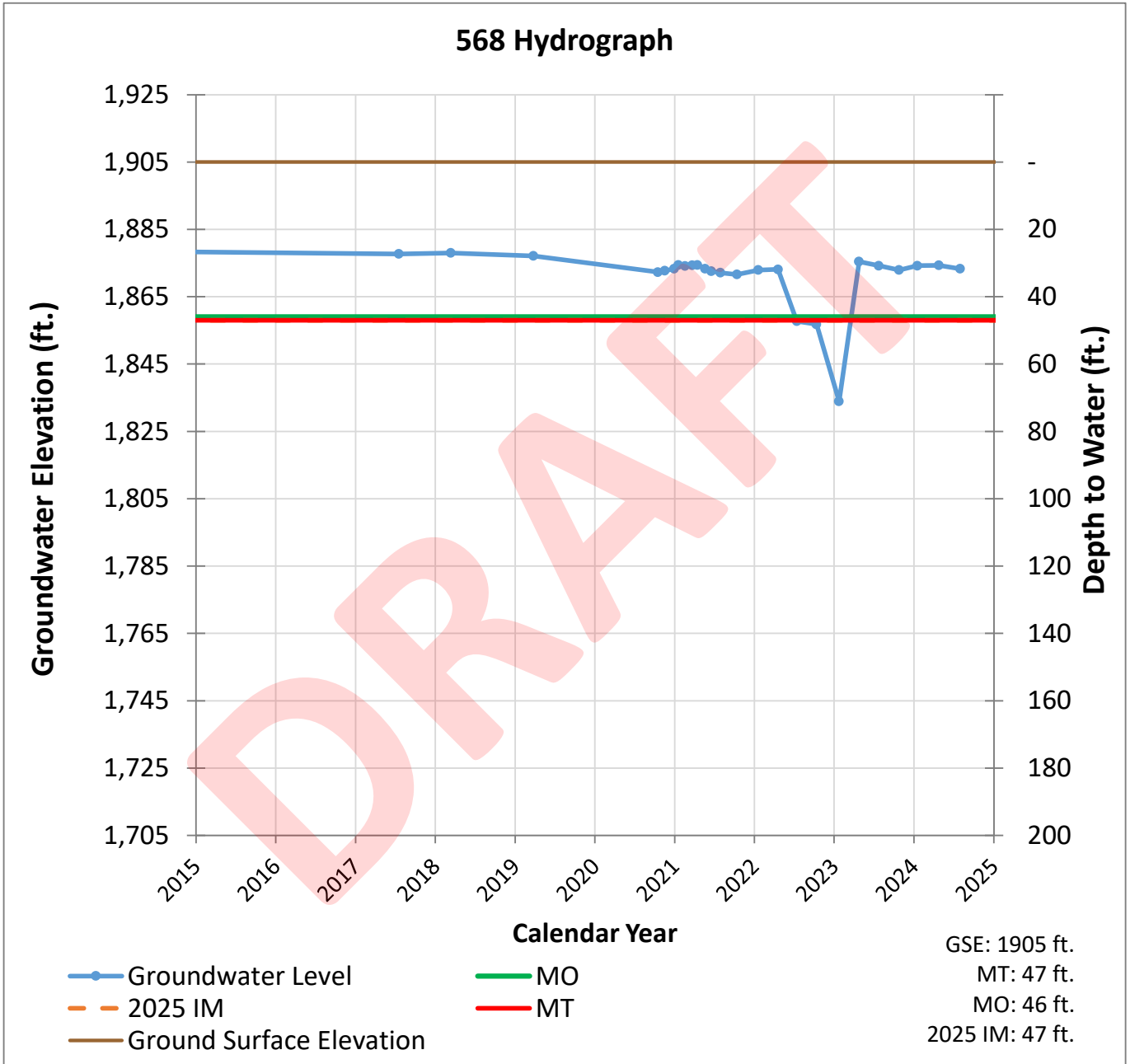


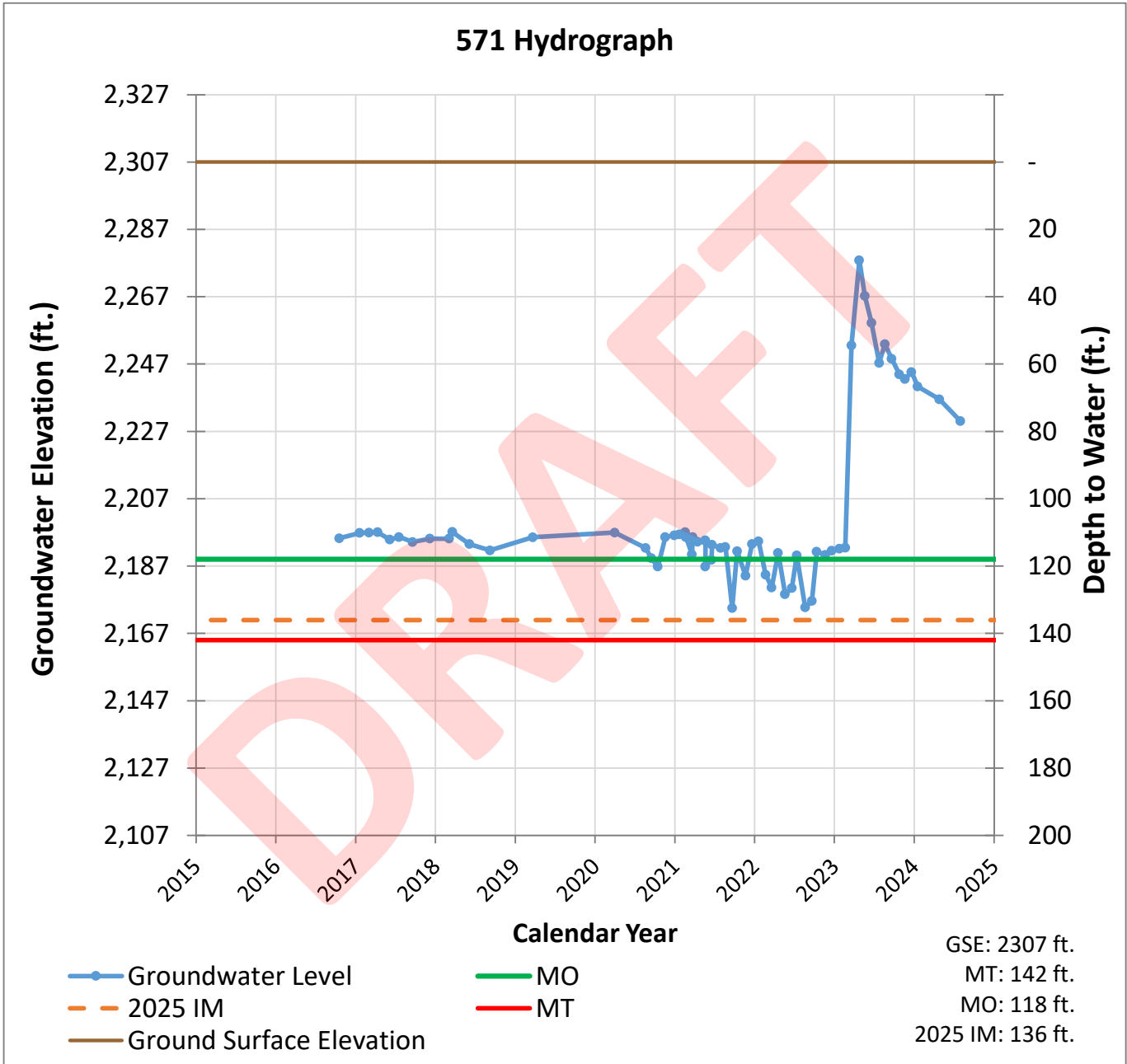


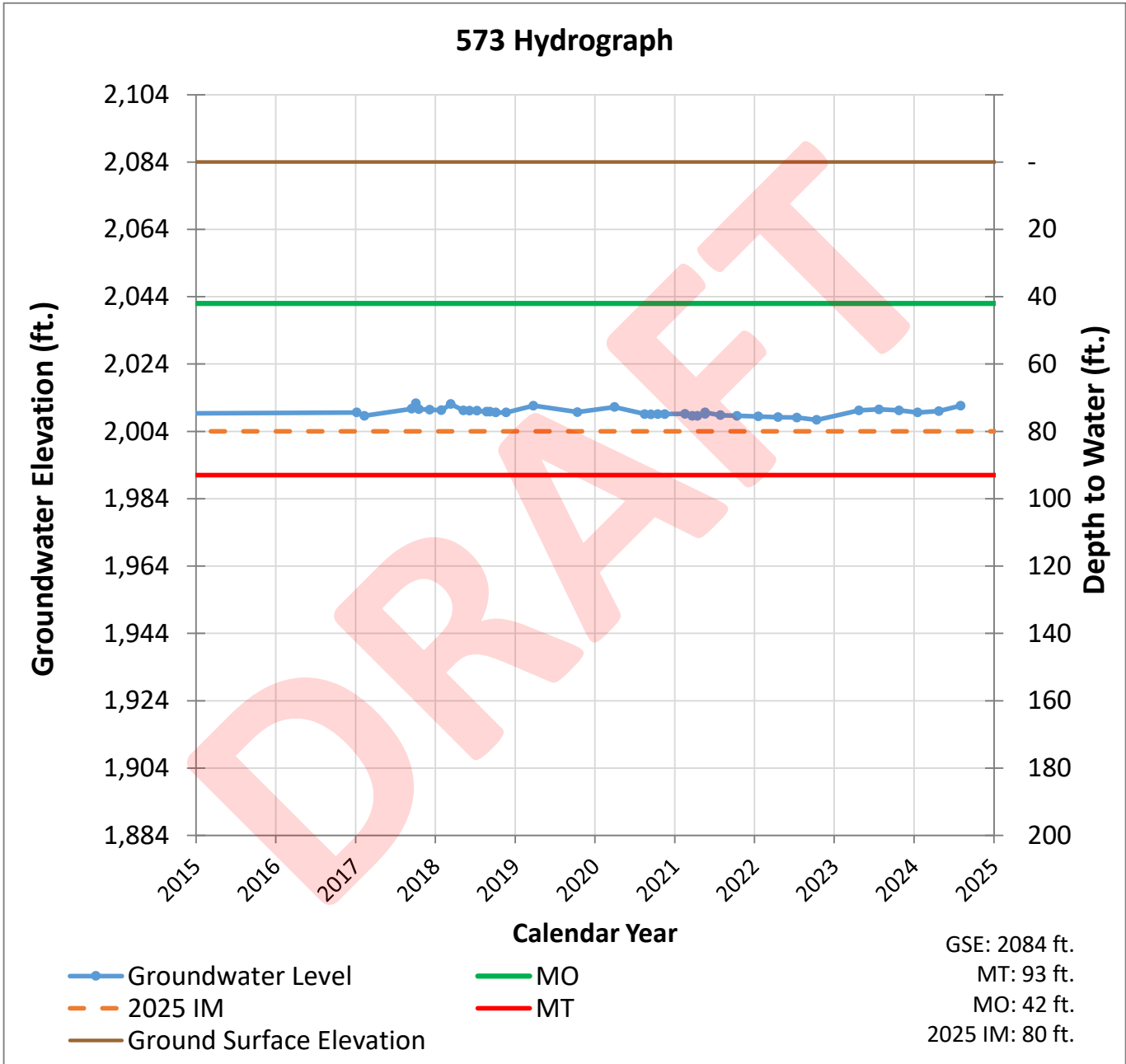




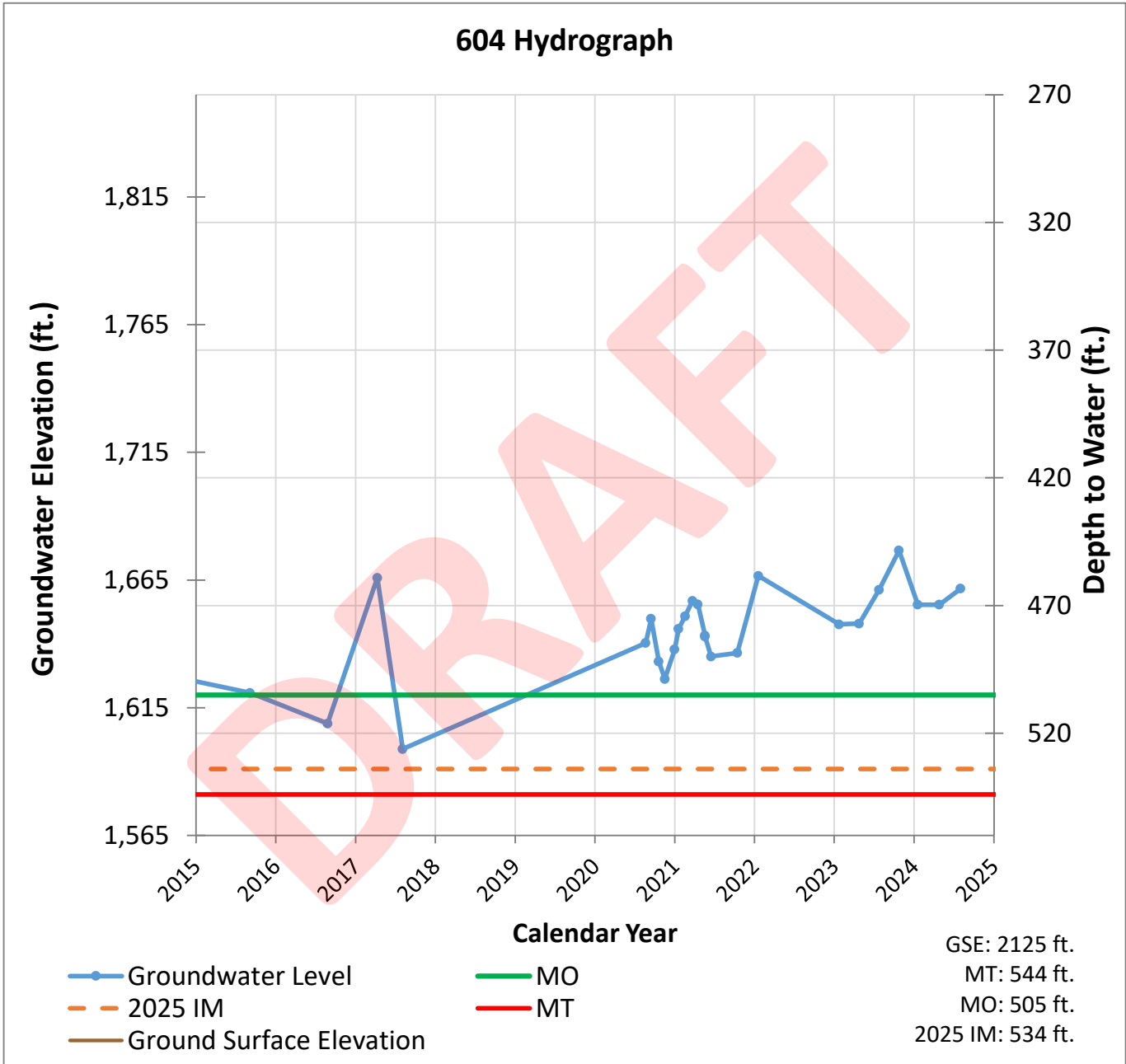


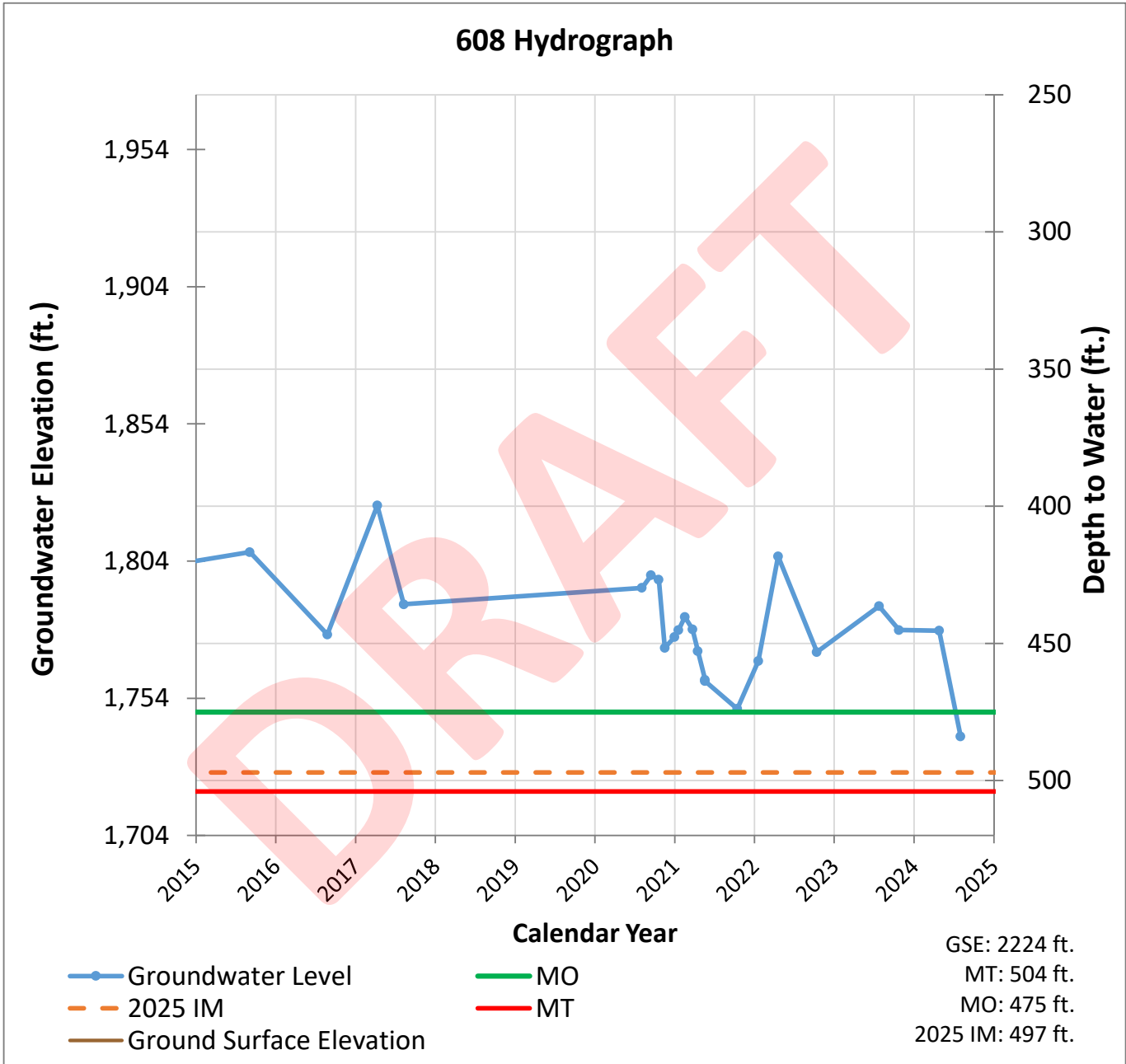


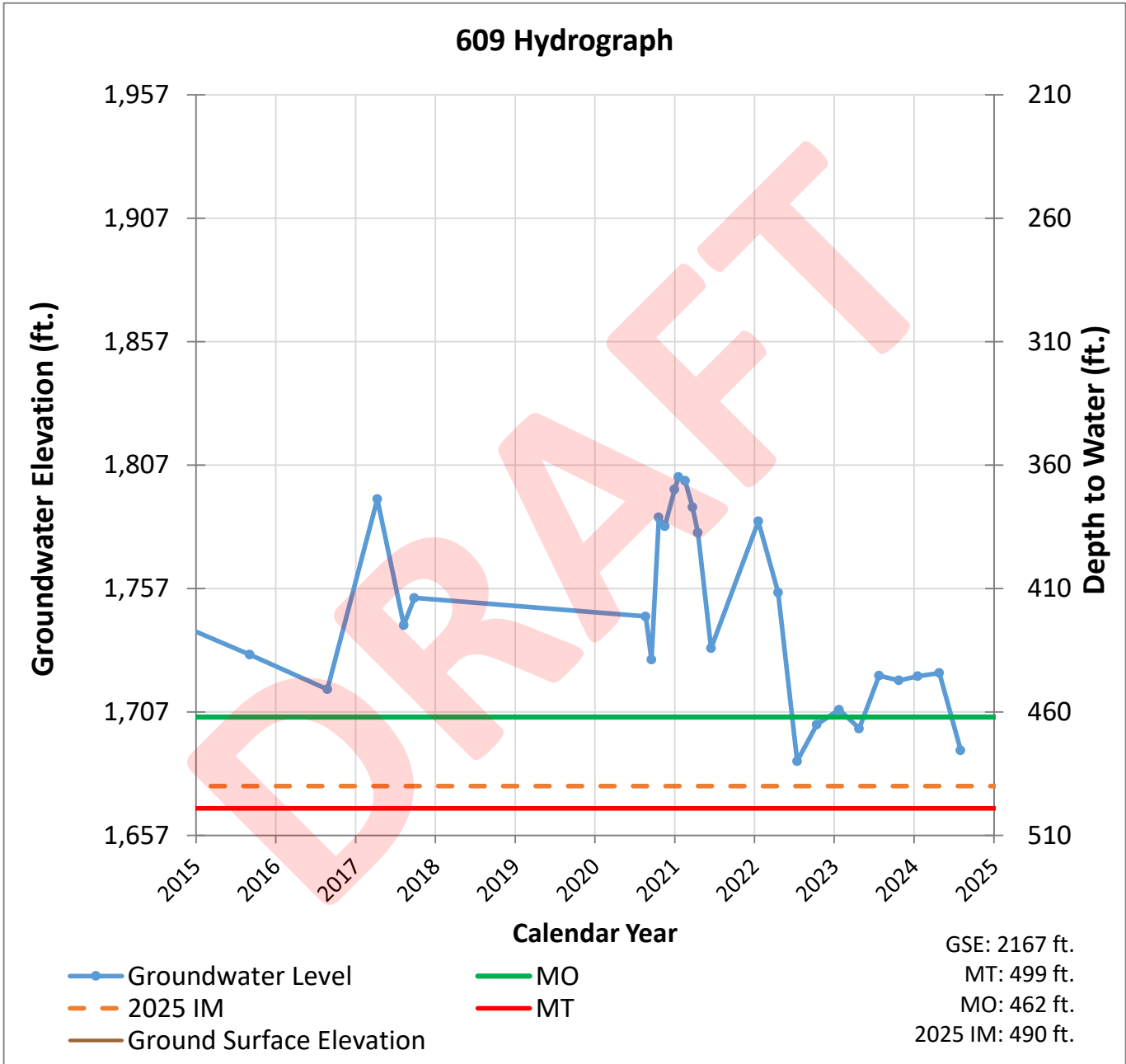


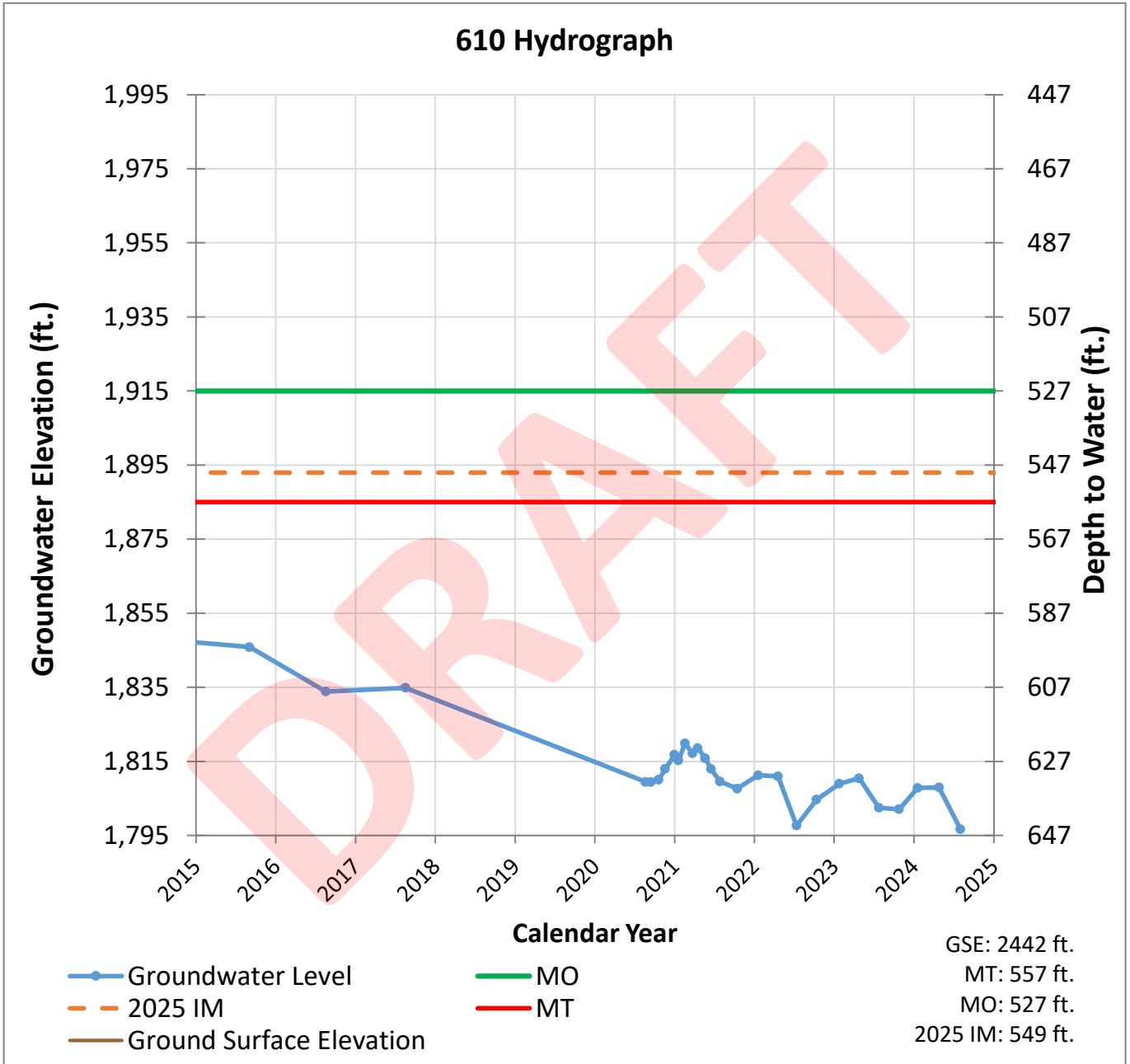




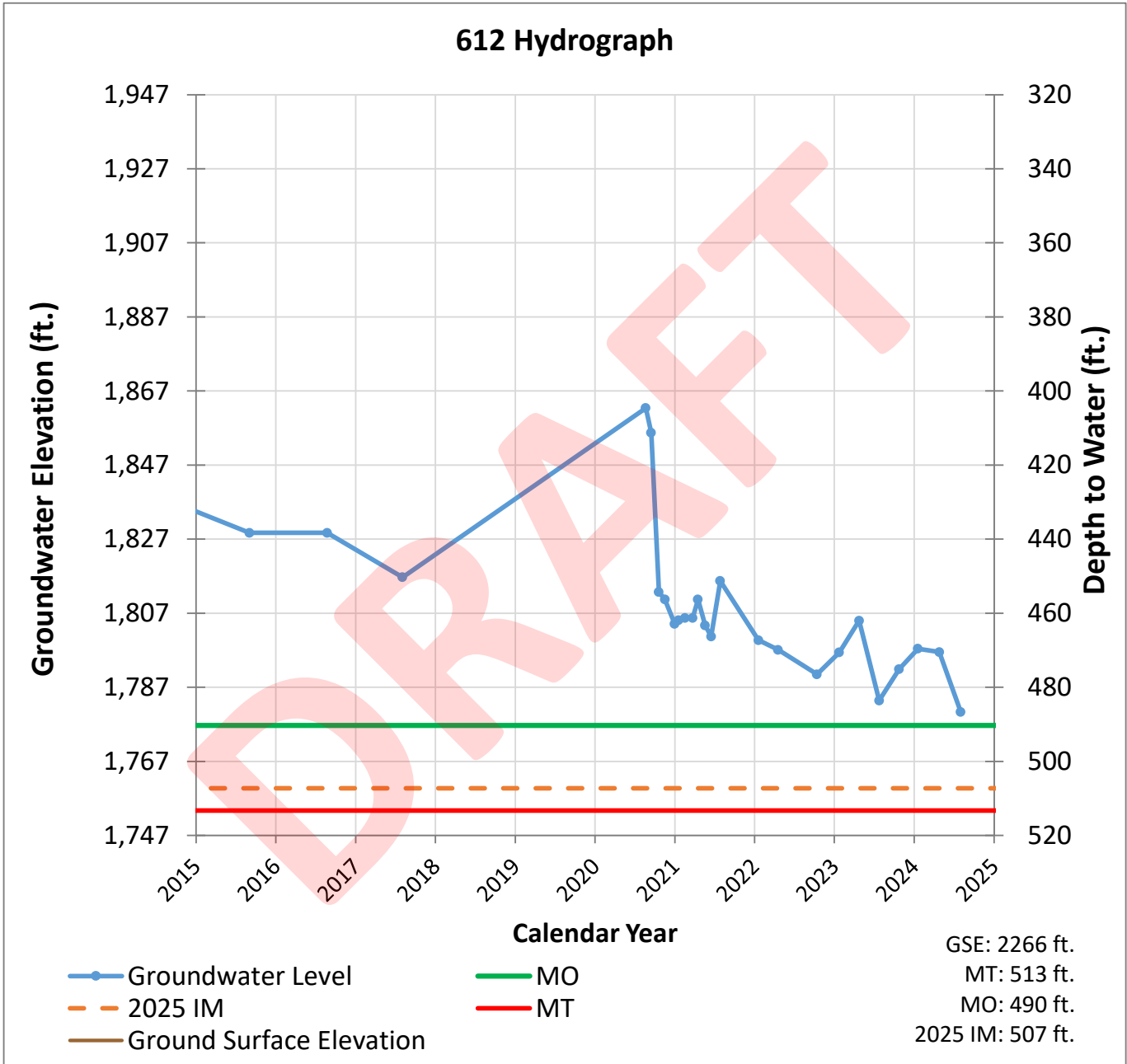


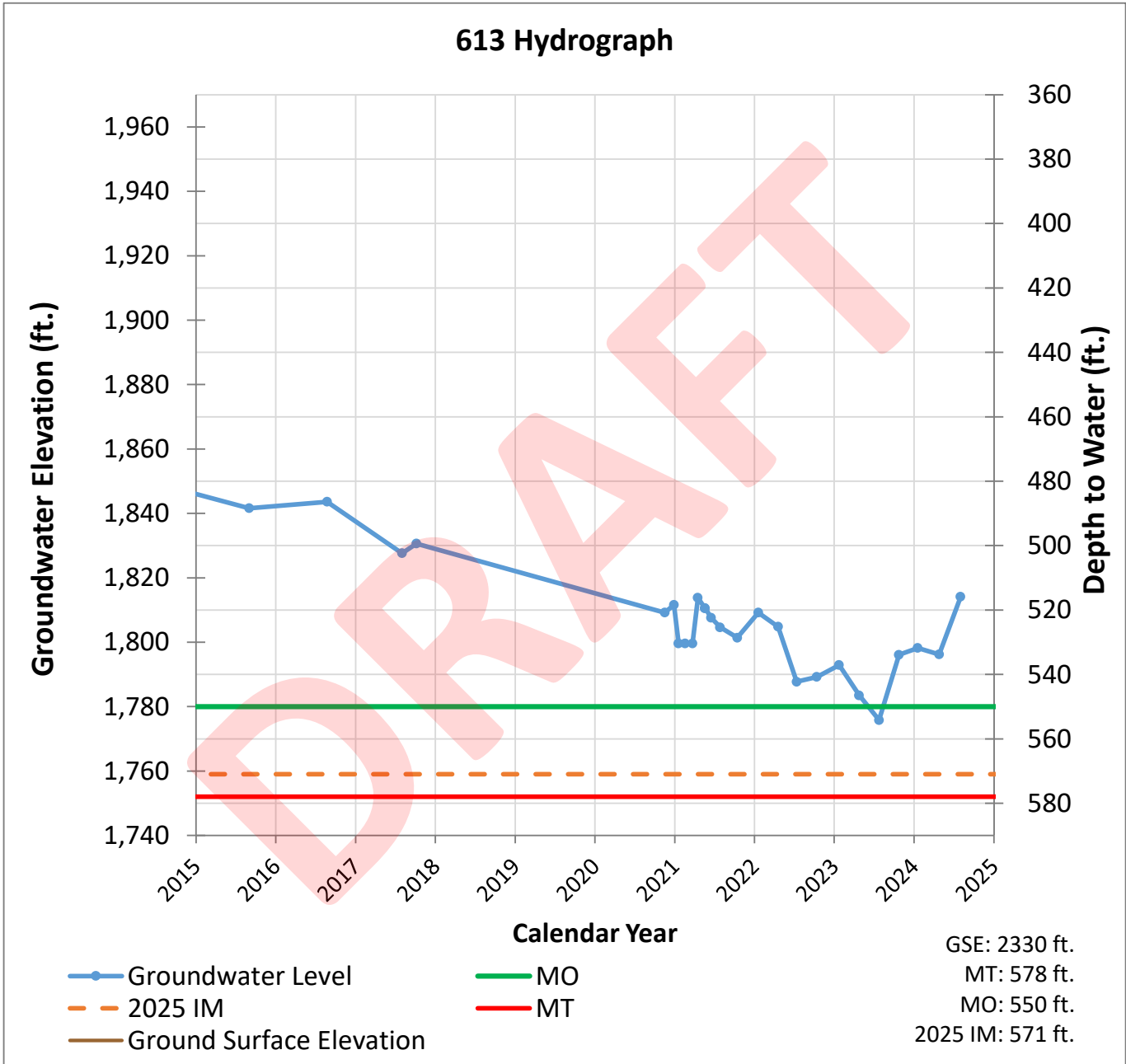


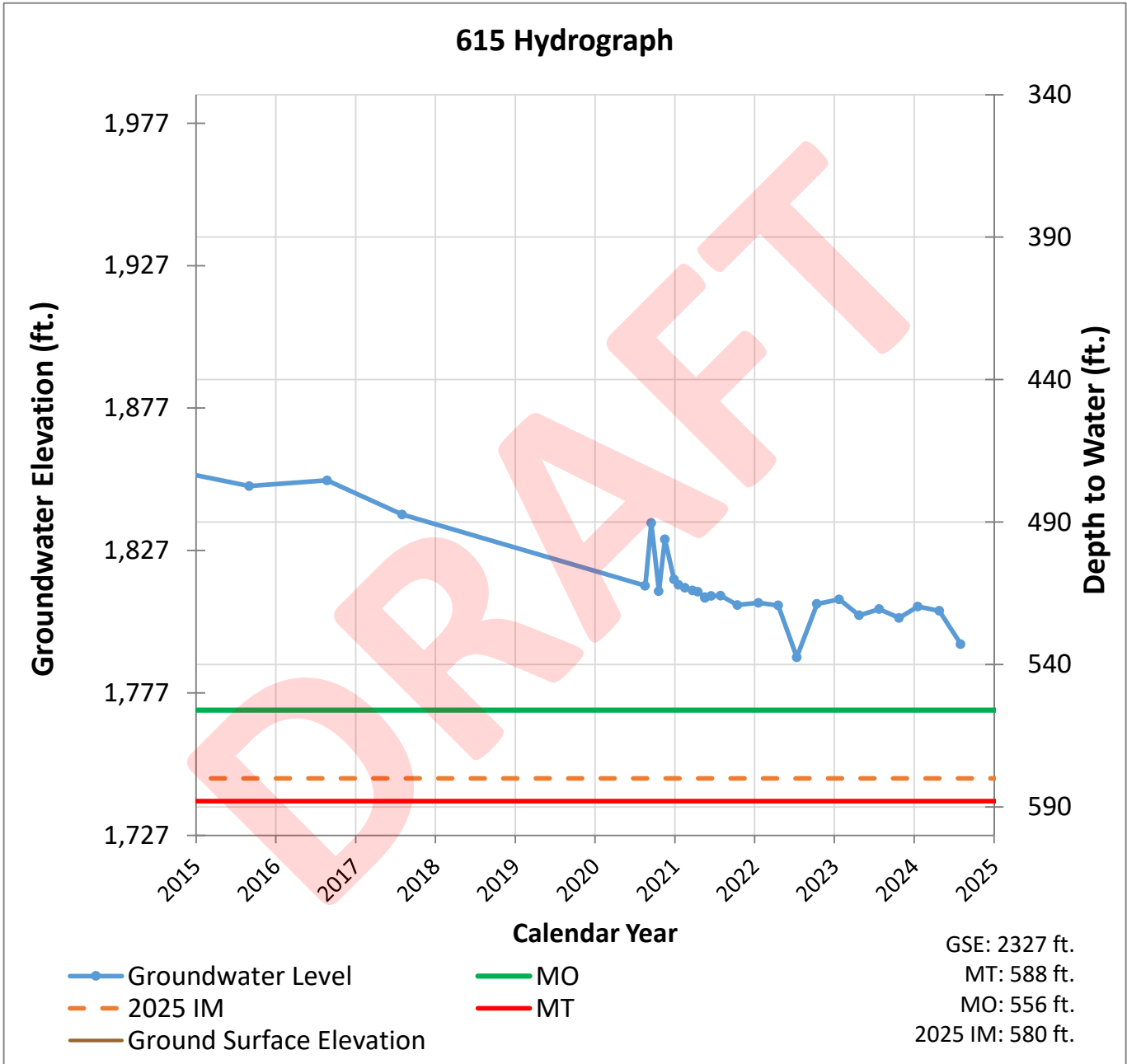


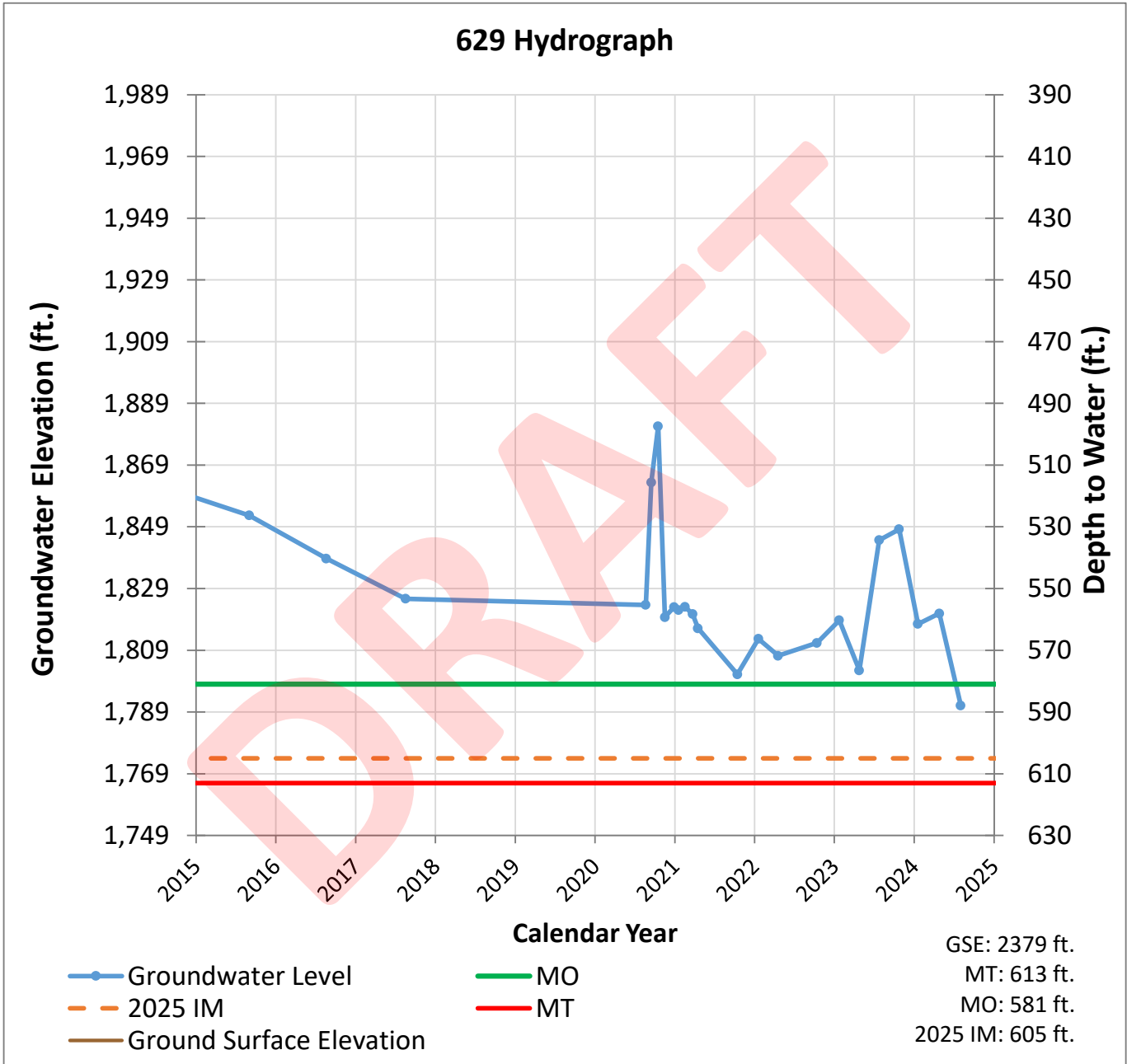


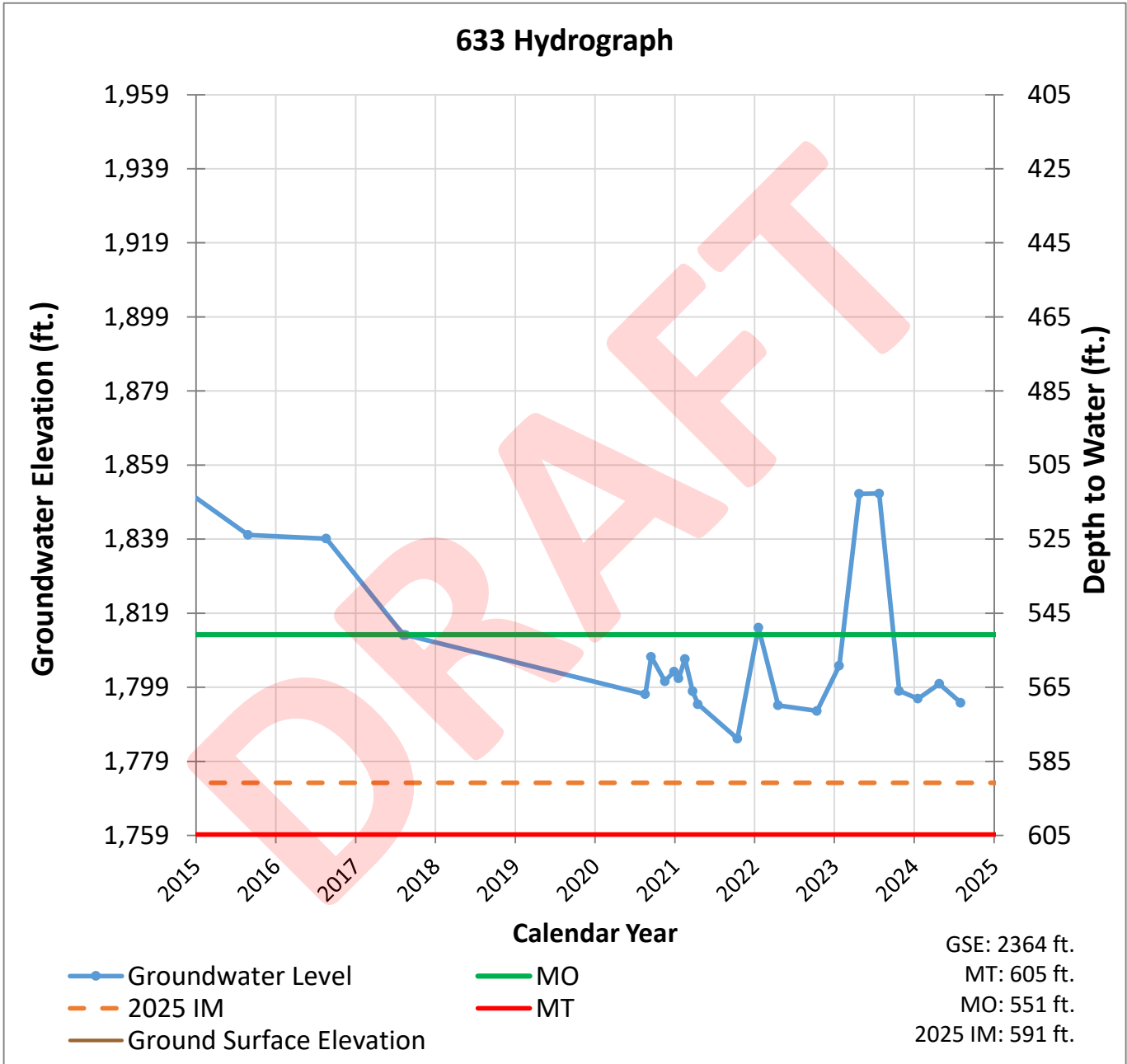




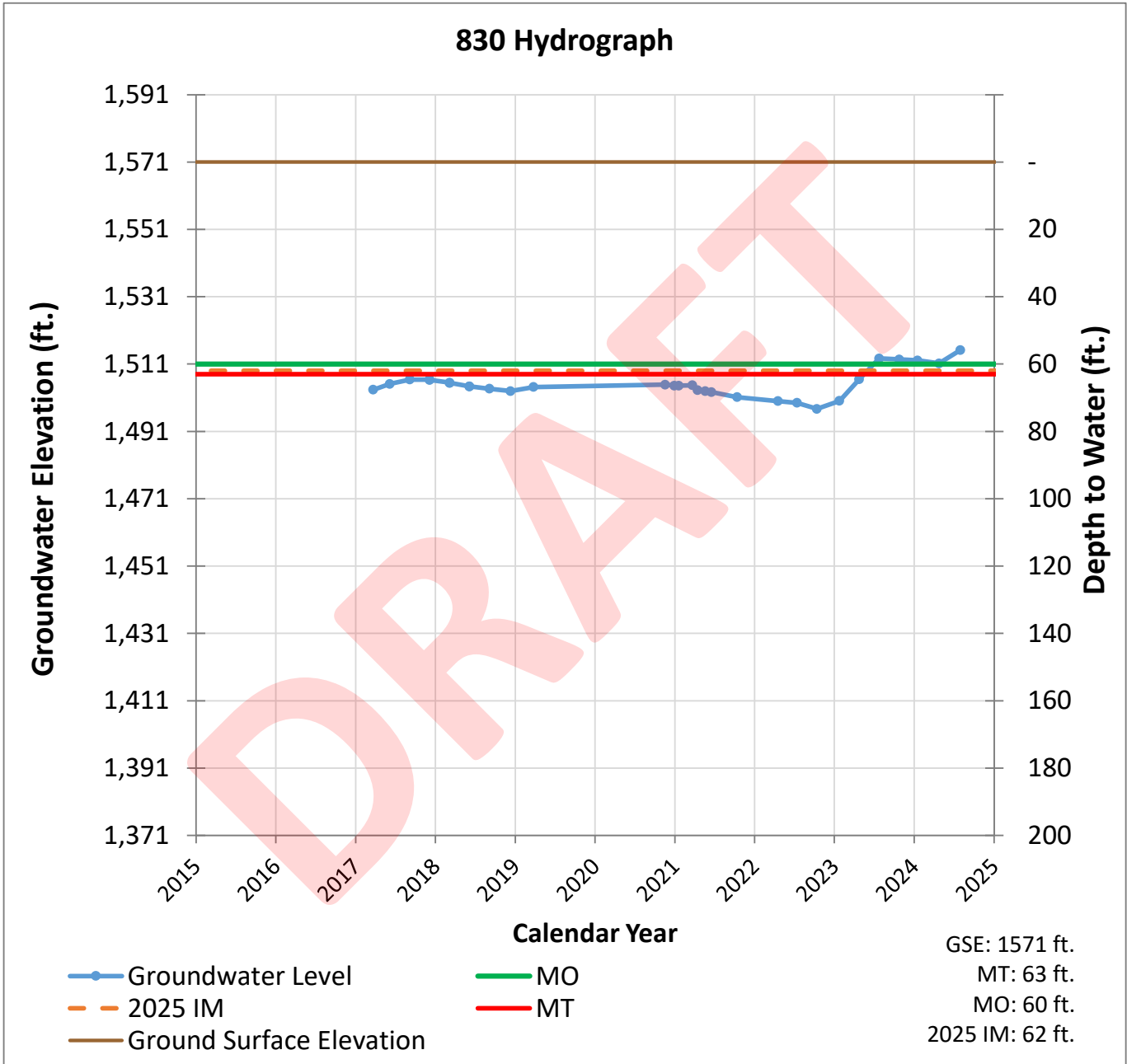


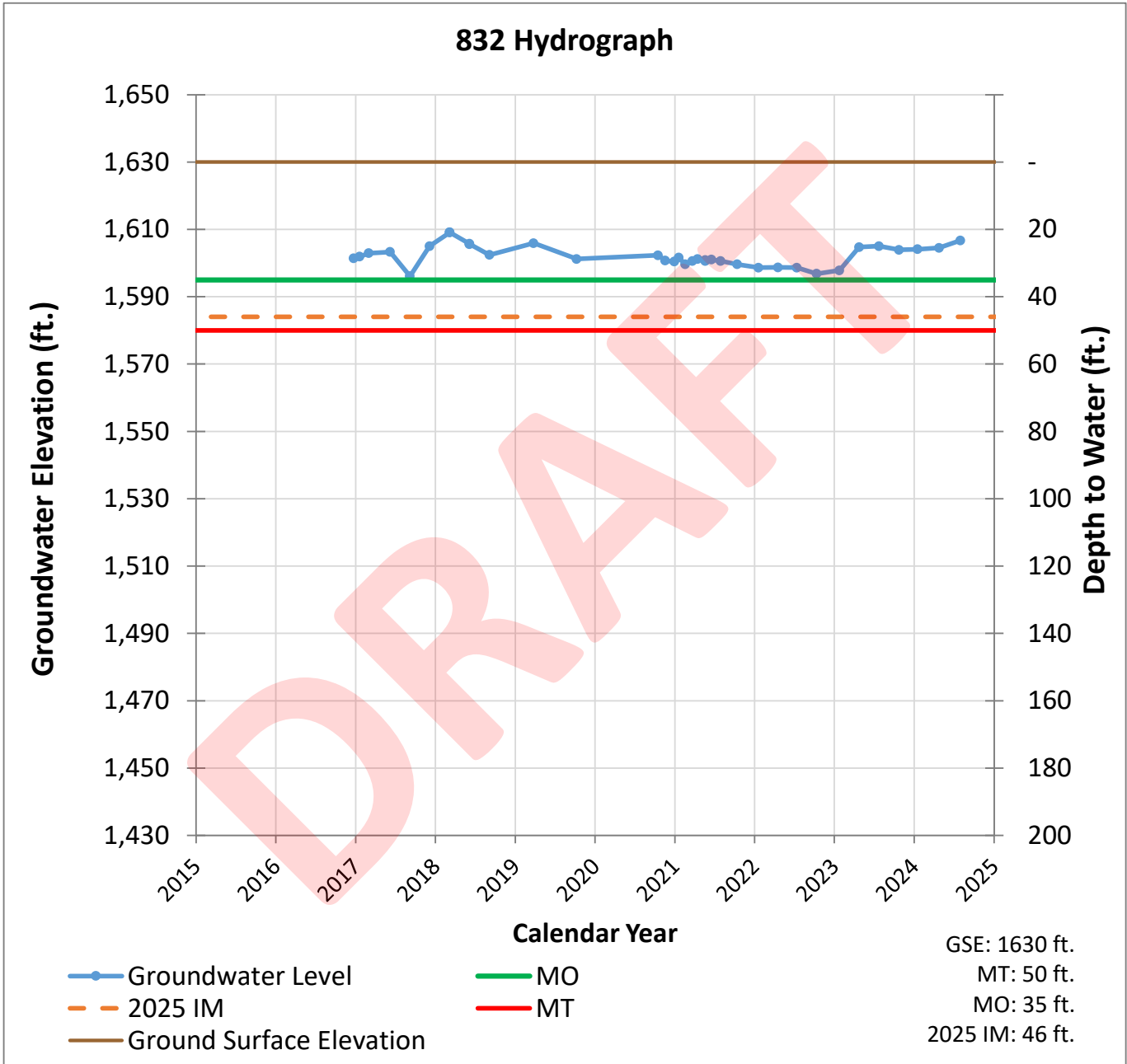


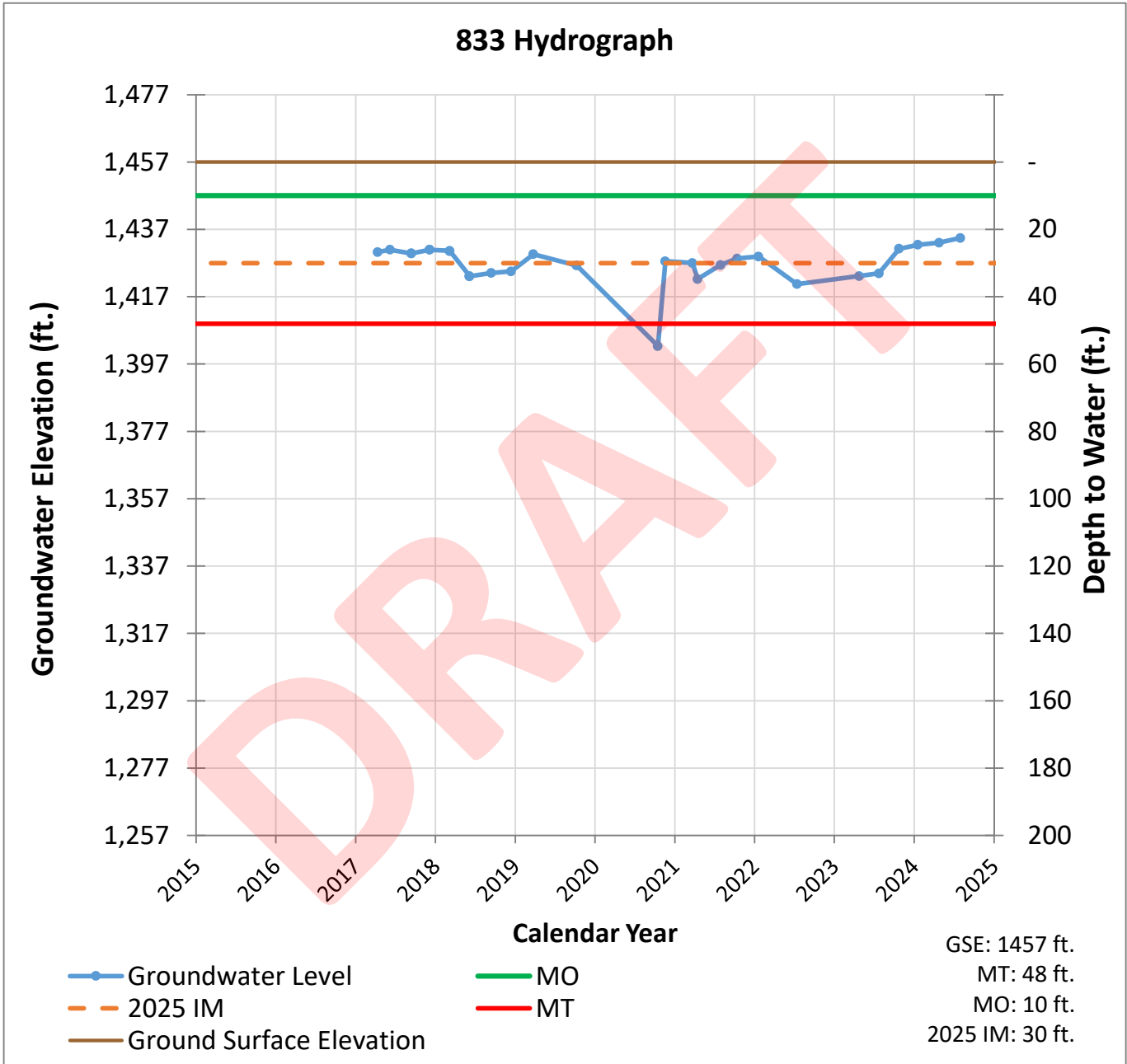


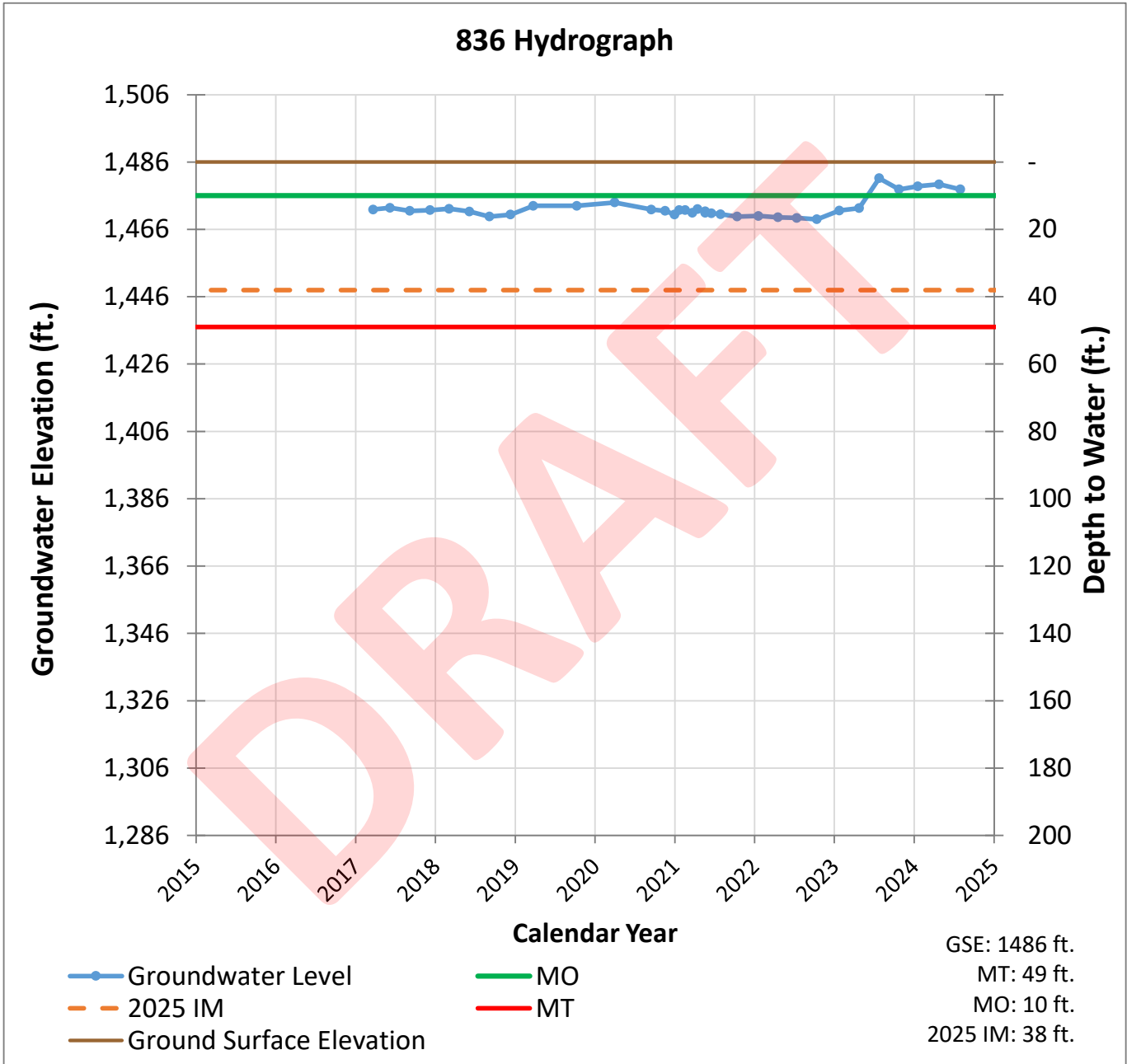


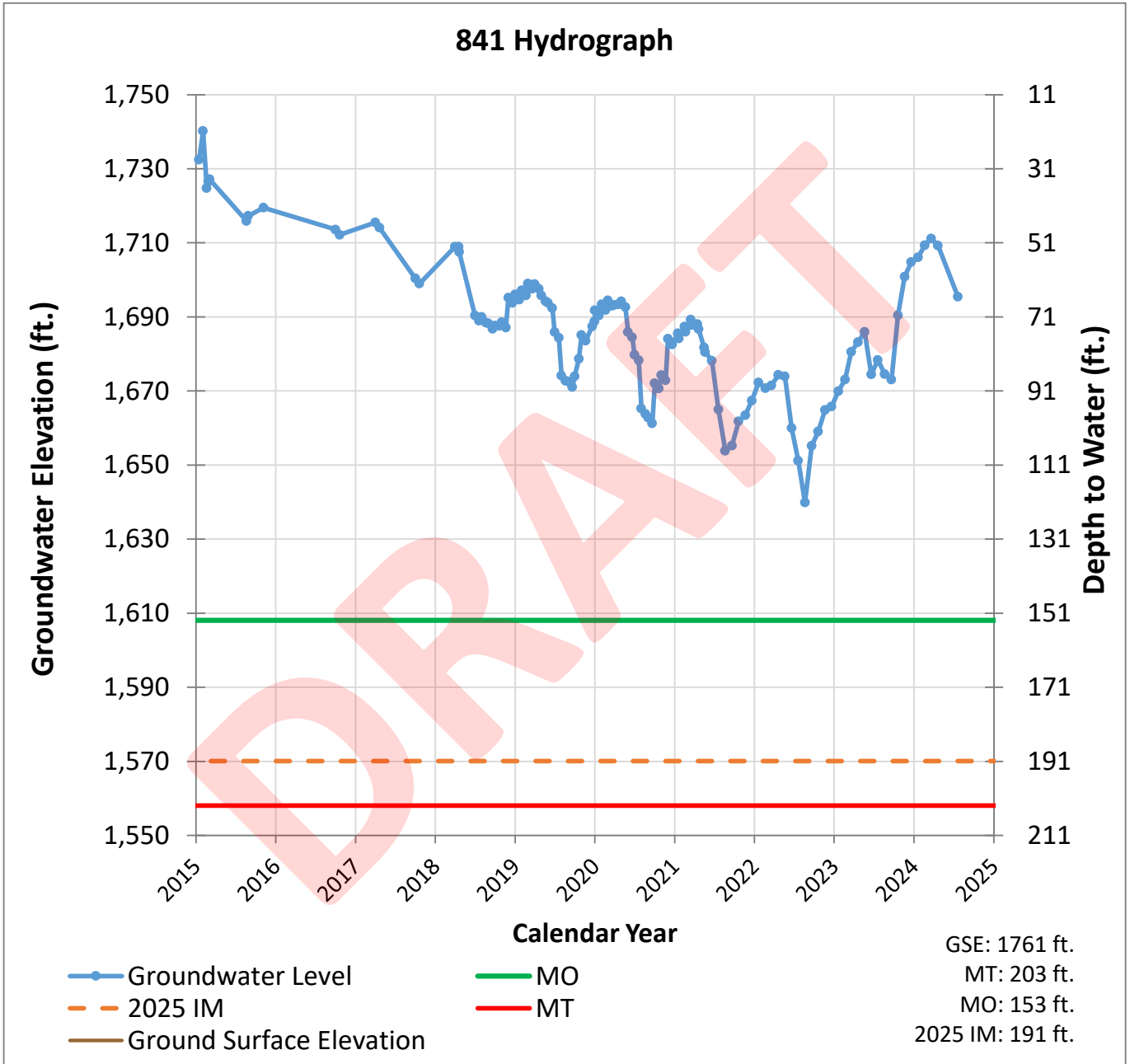




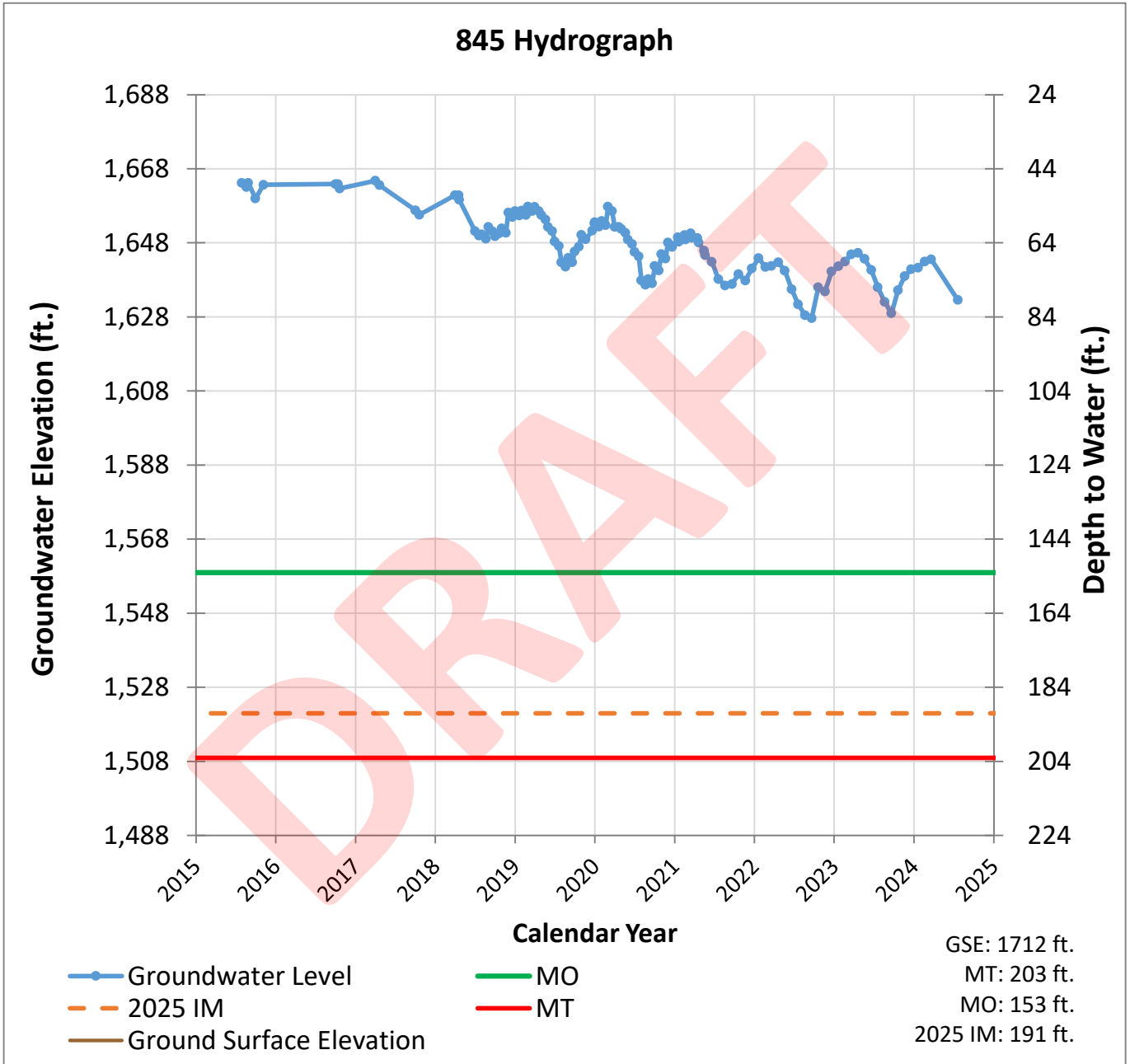












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TO: Board of Directors  
Agenda Item No. 11b

FROM: Taylor Blakslee / Joseph Hughes

DATE: March 5, 2024

SUBJECT: Discuss and Take Appropriate Action on 2024 Central Management Area Allocation Use

**Recommended Motion**

Approve the 2024 Central Management Area Allocation report.

**Discussion**

The 2024 Central Management Area Allocation Report is provided as **Attachment 1** for consideration of approval.

# Cuyama Basin Groundwater Sustainability Agency

## 11b. Discuss and Take Appropriate Action on 2024 Central Management Area Allocation Use

Jim Beck/ Brian Van Lienden

**March 5, 2025**





# Background

- On January 11, 2023, the CBGSA approved the CMA administrative policy for managing pumping reductions in the CMA:
  1. Each landowner/operator must submit monthly meter readings for the preceding year by January 31st according to the CBGSA meter reporting instructions
  2. Each landowner must list the APNs the well served and how many acre-feet of water was used on each APN
  3. Staff will develop a water accounting to report at the March Board meeting to confirm annual pumping reduction goals are met for the net water use for landowners/operators
- Staff processed the 2024 water use information, and the 2024 Allocation Report is provided on the following slide
- **Staff is seeking Board approval of the 2024 Allocation Report**



# 2024 CMA + Farm Unit Allocation Report

Reporting Entity	Landowner	Parcel Areas (Acres)	Allocation (AF)	Reported Pumping (AF)	Percent Used
<b>1. Ann Buck</b>		<b>40.00</b>	<b>118.59</b>	<b>111.50</b>	<b>94%</b>
<b>2. CCSH Farms, Doug Slumskie</b>		<b>40.00</b>	<b>115.38</b>	<b>107.00</b>	<b>93%</b>
<b>3. Duncan Family Farms, LLC/Aguila G Boys</b>		<b>930.88</b>	<b>1310.36</b>	<b>n/a</b>	<b>n/a</b>
<b>4. Grimmway Enterprises, Inc</b>		<b>13,474.03</b>	<b>17,992.01</b>	<b>13,379.35</b>	<b>74%</b>
	Caliente Ranch Cuyama, LLC	2,115.22	2,133.69	305.96	14%
	Diamond Farming Company	1,995.71	3,265.84	3,473.88	106%
	Lapis Land Company, LLC	2,227.87	5,094.35	3,479.38	68%
	Ruby Land Company, LLC	7,135.23	7,498.12	6,120.13	82%
<b>5. JHP Global/Joo Capital</b>		<b>176.85</b>	<b>165.22</b>	<b>4.86</b>	<b>3%</b>
<b>6. Kern Ridge Growers, LLC</b>		<b>510.94</b>	<b>869.17</b>	<b>196.25</b>	<b>23%</b>
<b>7. Sunrise Olive Ranch, LLC</b>		<b>934.24</b>	<b>2,514.57</b>	<b>1,825.17</b>	<b>73%</b>
	Sunrise Ranch Properties, LLC	927.24	2,487.81	1,825.17	73%
	Carl Reinhard	7.00	26.76	0.00	0%
<b>8. Triple H Farming, LLC, Jason, Roy, &amp; Ryan Harrington</b>		<b>38.53</b>	<b>125.51</b>	<b>113.50</b>	<b>90%</b>
<b>9. Wm. Bolthouse Farms, Inc.</b>		<b>13,495.18</b>	<b>22,139.31</b>	<b>10,150.18</b>	<b>46%</b>
	Belden Family Trust ET AL	6,152.12	8,060.06	349.29	4%
	Bolthouse Land Company, LLC	6,482.94	12,734.68	9,340.12	73%
	Lear Real Estate Enterprises, LLC	541.63	815.55	460.76	56%
	Cuyama Solar	318.49	529.03	0.00	0%
<b>Subtotal</b>		<b>29,640.65</b>	<b>45,350.12</b>	<b>25,887.80</b>	<b>57%</b>



TO: Board of Directors  
Agenda Item No. 11c

FROM: Taylor Blakslee

DATE: March 5, 2025

SUBJECT: Discuss and Take Appropriate Action on GSA Project Prioritization/Schedule

### **Recommended Motion**

Board feedback requested.

### **Discussion**

During the development of the amended 2024 Groundwater Sustainability Plan (GSP), staff captured several items suggest by the board and standing advisory committee (SAC) members to be considered in the future. These suggestions were compiled into a draft project prioritization list, which was presented for review at the SAC meeting on January 9, 2025, and the board meeting on January 15, 2025. Based on feedback from both groups/meetings, the draft list was refined and finalized.

The finalized project/initiative list was distributed to SAC members to indicate which items were most important to them to assist staff in developing a five-year work plan. The finalized project/initiative priority list, with a summary of SAC project importance, was distributed to board members to complete.

A summary of the project/initiative importance rankings is provided as **Attachment 1**. Staff used the board feedback to develop a draft schedule for the top ranked projects/initiatives for board review which is provided as **Attachment 2**.

### **Staff is seeking Board feedback on:**

1. The draft 2025-2029 schedule
2. How to handle lower-ranked projects (options below):
  - a. Include on the 2025-2029 schedule
  - b. Considered annually during the budget development process, or project prioritization review
  - c. Only consider if grant funded
  - d. Put on a "do not consider at this time" list
  - e. Other

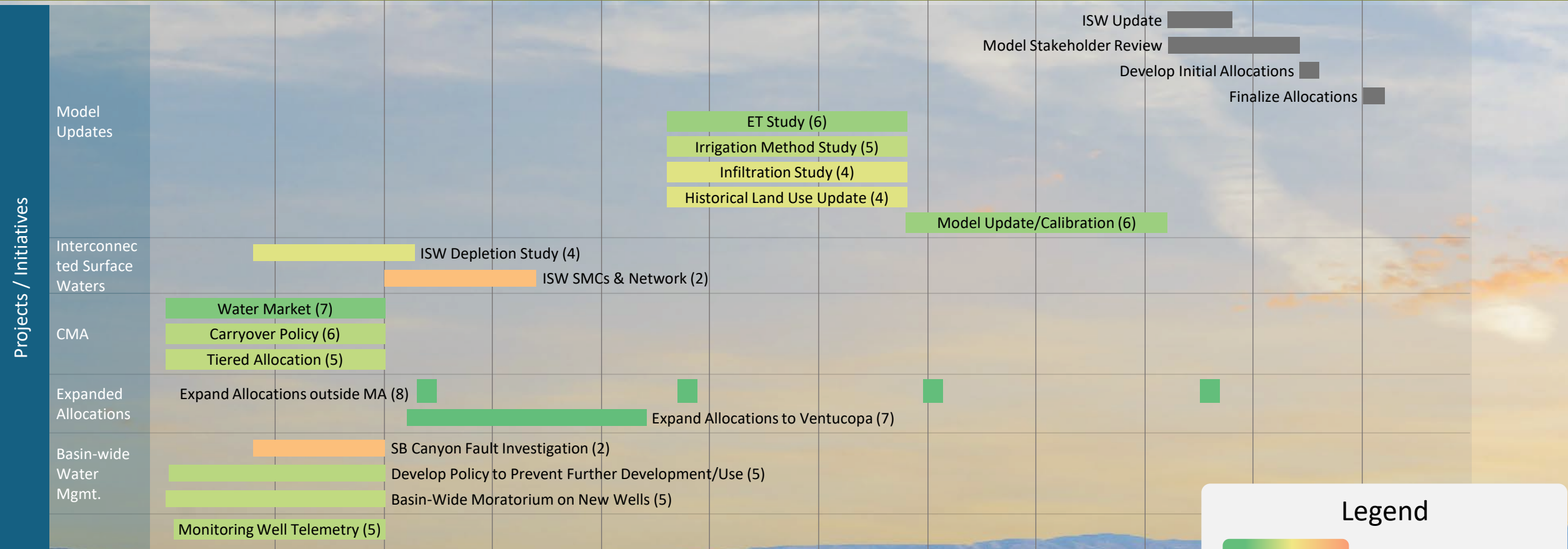
Cuyama Project Prioritization List				Board Rank	SAC Rank	Required by SGMA
Category	Title	Est. Level of Effort	Board Rank	SAC Rank	Required by SGMA	
B.6 MA   Expanded Allocations	Allocations Outside Existing Management Areas	Medium	8	3		
B.5 MA   Expanded Allocations	Ventucopa Management Area	High	7	3		
B.2 MA   CMA	Water Market	Medium	7	2		
A.1 Model Updates	Evapotranspiration Study	Medium	6	4		
A.5 Model Updates	Model Recalibration/Update	High	6	2		
B.1 MA   CMA	Carryover Policy	Low	6	2		
A.2 Model Updates	Irrigation Efficiency/Methods Study	Medium	5	5		
A.15 Groundwater Monitoring Netwo	Monitoring Well Telemetry	Medium	5	4		
B.3 MA   CMA	Tiered Allocation Approach (e.g. Minimum Allocation)	Medium	5	4		
B.8 MA   Basin-Wide Water Mgmt. P	Preventing Further Development/Water Use	Unknown	5	3		
B.10 MA   Basin-Wide Water Mgmt. P	Basin-Wide Management Plan (Including Allocations)	Unknown	5	2		
A.10 Basin Understanding	Infiltration Rate Study	Unknown	4	5		
B.4 MA   CMA	Reconsider Allocation Policy	Medium	4	4		
A.12 ISW	ISW Depletion Study	High	4	3	X	
B.7 MA   Basin-Wide Water Mgmt. P	Basin-Wide Moratorium on New Wells	Unknown	4	3		
C.5 Projects   GSP Projects	Flow Meter Calibration Program	Medium	4	3		
A.4 Model Updates	Historical Land Use Update	Medium	4	1		
A.3 Model Updates	Deep Percolation Study	High	3	4		
A.9 Basin Understanding	3D Basin Map	Unknown	3	2		
A.16 Land Use	Land Repurposing Grants / Incentives	Unknown	3	2		
A.14 Groundwater Monitoring Netwo	New Monitoring Wells	High	3	1		
A.11 Basin Understanding	Water Age Testing	Unknown	2	4		
A.17 Land Use	Irrigation Efficiency Grants / Incentives	Unknown	2	4		
A.6 Additional Fault Investigations	Santa Barbara Canyon Fault	High	2	3		
B.9 MA   Basin-Wide Water Mgmt. P	Analyze Geochem of Water	Unknown	2	3		
A.8 Additional Fault Investigations	Ozena	High	2	2		
A.13 ISW	ISW Sustainable Management Criteria and Monitoring Network	Medium	2	2	X	
A.19 Outreach	Workshops	Medium	2	1		
C.10 Additional Projects	Irrigation Water Run Off Study	Unknown	2	0		
A.7 Additional Fault Investigations	Russell Fault	High	1	3		
C.4 Projects   GSP Projects	Improve Reliability of Water Supplies for Local Communities (Ventu	Unknown	1	3		
C.1 Projects   GSP Projects	Flood and Stormwater Capture - Project Feasibility Study	High	1	2		
C.6 Additional Projects	Prescriptive Burns	Unknown	1	2		
C.7 Additional Projects	Vegetation Management	Unknown	1	1		
C.3 Projects   GSP Projects	Precipitation Enhancement - Project Feasibility Study	High	1	0		
C.8 Additional Projects	Groundwater Dependent Ecosystem Enhancement	Unknown	1	0		
C.9 Additional Projects	Irrigation Method Comparison	Unknown	1	0		
C.2 Projects   GSP Projects	Water Supply Transfers/Exchanges - Companion Project to Flood a	High	0	2		
A.18 Outreach	Newsletters	Low	0	1		

# Draft 2025-2029 Schedule

2030 Periodic Eval



Mar 2025	Aug	Jan 2026	Jun	Nov	Apr	Sep	Feb 2028	Jul	Dec	May	Oct	2030
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### Legend

- Board Priority (rank)
- Model Milestone



TO: Board of Directors  
Agenda Item No. 11d

FROM: Taylor Blakslee, Hallmark Group

DATE: March 5, 2025

SUBJECT: Discuss and Take Appropriate Action on Fiscal Year 2025-2026 Budget Components

**Recommended Motion**

Board of Directors feedback requested on the draft budget component list.

**Discussion**

The draft Fiscal Year 2025-2026 budget component list was developed with the budget ad hoc committee (Directors Burnes, Young, and Zenger) and is provided as **Attachment 1**.

Following any Board feedback, staff will develop cost estimates for the proposed budget components and review with the budget ad hoc prior to the May 7, 2025, Board meeting where the Board will consider adopting the budget and setting the fiscal year groundwater extraction fee.



## DRAFT CBGSA FISCAL YEAR 2025-2026 BUDGET

A

### CATEGORY

#### A HALLMARK GROUP

1	CBGSA Board of Directors Meetings
2	Consultant Management and GSP Implementation
3	Financial Information Coordination
4	Cuyama Basin GSA Outreach
5	Annual Groundwater Extraction Fee
6	Response to DWR Comments on 2024 Amended GSP
7	Groundwater Allocation Implementation (Changed task name from "Central Management Area Support")
8	Adjudication Coordination/Support
9	Enforcement for Un-reported Water User
10	Well Permit Review
11	Other Direct Charges (Mileage, conference lines, copies)
	Subtotal

#### B LEGAL

1	General Legal Counsel
2	Adjudication Legal Counsel
	Subtotal

#### C ADMIN

1	Audit (FY 23-24)
2	Insurance (D&O, General Liability)
3	California Association of Mutual Water Co. Membership
4	2025 Updated Parcel Data
5	CIMIS Station (Initial Setup and Ongoing)
6	Contingency
	Subtotal

#### D WOODARD & CURRAN & TECHNICAL

1	Grant Proposals
2	<b>Stakeholder/Board Engagement</b>
3	SAC meetings
4	Board meetings
5	Board Ad-hoc calls
6	Tech Forum calls (new item)
7	Public Workshops
8	<b>Outreach</b>
9	General, Newsletter Development, etc.
10	Website Updates - Maintenance / Hosting
11	Well Permit Review
12	Support for DWR Technical Services (TSS) and Enforce Well Pumps
13	<b>GSP Implementation Support</b>
14	GSP Implementation Program Management
15	GW Levels and GWQ Monitoring Network Coordination and Data Mgmt - W&C
16	DMS Ongoing Maintenance and Enhancements
17	Support for Adaptive Management of Groundwater Levels
18	Prepare Annual Report for Cuyama Basin
19	ISW Update Study and Set SMCs/Network
19	Meter Implementation - Ongoing Support
	Response to DWR Comments on 2024 Amended GSP
20	Grant Admin (SGM Round 1)
21	<b>Perform Monitoring and Monitoring Network Enhancements</b>
22	Install Transducers
23	<b>Improve Understanding of Basin Water Use</b>
24	Perform Updated Land Use Survey (Update Annual Land Use)
25	Enhance Existing CIMIS Station & Implement New Stations (including O&M)
26	<b>Project &amp; Management Action Implementation</b>
27	Pumping Allocation Implementation
28	Analysis of Management Action Implementation Options
29	Precipitation Enhancement Feasibility Study

#### E OTHER TECHNICAL

1	Quarterly GW Levels and Piezometer Monitoring (Contractor TBD)
2	Annual WQ Monitoring (Contractor TBD)
3	Annual Stream Gauge Maintenance (USGS)



TO: Board of Directors  
Agenda Item No. 11f

FROM: Taylor Blakslee

DATE: March 5, 2025

SUBJECT: Discuss and Take Appropriate Action on Landowner CIMIS Station Installation Proposal

### **Recommended Motion**

Approve the CIMIS station installation proposal.

### **Discussion**

The Cuyama Basin Groundwater Sustainability Agency (CBGSA) grant-funded projects include funding for California Irrigation Management Information System (CIMIS) weather stations, to improve estimates of reference evapotranspiration in the model and expand spatial coverage of reference evapotranspiration across the basin.

On November 4, 2024, CBGSA board approved the recommendations from the CIMIS Station Board Ad hoc (Directors Bantilan, Burnes, and Wooster), which include:

- The GSA will fund initial and O&M costs related to CIMIS station installation
- Water use to maintain CIMIS area is exempt from groundwater extraction fees and calculations for groundwater allocations
- Develop a maintenance contract with the landowner to allow direct billing for station setup and O&M costs.

Landowner Byron Albano has been identified as a willing program participant and has provided a proposal (Attachment 1) to install the irrigation system necessary to maintain the vegetation required for operation of a CIMIS station.

Staff is requesting Board review and approval of the attached proposal.

Additionally, local landowner Sunridge Nurseries recently indicated a willingness to participate in the CIMIS station program. To keep moving forward with this project, staff is requesting authorization to approve a set up proposal from Sunridge Nurseries if under \$\_\_\_\_ and provided the California Department of Water Resources approves the location.

**CIMIS Station Set Up Proposal**

	<b>Qty.</b>	<b>Unit Cost</b>	<b>Total Cost</b>
1 Installation Labor			\$2,059.20
2 Trenching			\$3,200.00
3 Euromag 6" flow meter with flange set	<b>1</b>	2122.08	\$2,122.08
4 Nelson 1000V3 INL HI B25 E02 (L 07) R60 H2	<b>2</b>	1372.04	\$2,744.08
5 Nelson R2000 K2 15 Yellow Plate, 1.0 2000 FC	<b>378</b>	11.05	\$4,176.90
6 TWIG-V	<b>1</b>	868	\$868.00
7 Glue and primer	<b>3</b>	75	\$225.00
8 3/4" class 200 PVC pipe	<b>6000</b>	0.2361	\$1,416.60
9 3/4" sch 40 PVC pipe	<b>1134</b>	0.4	\$453.60
10 1" class 200 PVC pipe	<b>2860</b>	0.3091	\$884.03
11 2" class 125 PVC pipe	<b>400</b>	0.7	\$280.00
12 3" class 125 PVC pipe	<b>440</b>	1.15	\$506.00
13 4" class 125 PVC pipe	<b>320</b>	1.92	\$614.40
14 4" sch 40 PVC pipe	<b>20</b>	4.27	\$85.40
15 6" class 125 PVC pipe	<b>160</b>	4.94	\$790.40
16 6" sch 40 elbow - soc	<b>5</b>	37.9	\$189.50
17 6" sch 40 T - soc	<b>1</b>	59.57	\$59.57
18 6" x 4" reducing bushing - soc	<b>2</b>	17.88	\$35.76
19 4" x 3" reducing bushing - soc	<b>2</b>	7.22	\$14.44
20 3" x 2" reducing bushing - soc	<b>2</b>	3.22	\$6.44
21 2" elbow	<b>4</b>	1.82	\$7.28
22 2" PVC ball valve	<b>2</b>		\$0.00
23 4" sch 40 elbow - soc	<b>7</b>	11.79	\$82.53
24 4x4x1 T - soc	<b>9</b>	17.64	\$158.76
25 3x3x1 T - soc	<b>11</b>	10.61	\$116.71
26 2x2x1 T - soc	<b>7</b>	2.4	\$16.80
27 2x2x3/4 T - soc	<b>3</b>	2.41	\$7.23
28 1x1x3/4 T - soc	<b>111</b>	0.94	\$104.34
29 1x3/4x3/4 T - soc	<b>27</b>	144	\$3,888.00
30 3/4 T - soc	<b>210</b>	0.432	\$90.72
31 3/4 elbow - soc	<b>30</b>	0.34	\$10.20
32 3/4 female adaptor - soc/ftp	<b>378</b>	0.432	\$163.30
			<b>\$25,377.26</b>



TO: Board of Directors  
Agenda Item No. 12b

FROM: Taylor Blakslee, Hallmark Group

DATE: March 5, 2025

SUBJECT: Discuss and Take Appropriate Action on Financial Controls Policy

**Recommended Motion**

Board direction requested.

**Discussion**

On January 15, 2025, the Fiscal Year 2023-2024 audit was presented by Daniells Phillips Vaughan & Bock. While the audit was clean, the single finding (which has been listed in previous audits) is “the Agency does not have proper segregation of duties in the cash receipts process. The person who receives the cash also deposits the cash and enters the transaction into the general ledger.”

In response to this finding the Board directed staff to develop options to address this and provided as Attachment 1 is: 1) a detailed description of the current process, 2) two options to improve the segregation of duties over financial reporting.

Staff is seeking Board feedback on whether to make a change to the financial controls, and if so, which option(s) to implement as outlined in Attachment 1.

## **CBGSA Internal Control Over Financial Reporting and Segregation of Duties**

### **Auditor Comments**

- The Agency does not have proper segregation of duties in the cash receipts process. The person who receives the cash also deposits the cash and enters the transaction into the general ledger.
- Cash received can be manipulated for personal gain and amounts received can be materially misstated on the financial statements.

### **Current Process – Revenue Generation**

- The Agency has two sources of revenue:
  - Groundwater Extraction Fees (GWE fees)
  - Department of Water Resources (DWR) Grant Reimbursements
- Revenue is determined by persons not responsible for entering the transactions into the general ledger:
  - Taylor Blakslee (Hallmark Group) develops the annual Groundwater Extraction Fee Tables and provides the revenue data to Jacqueline Harris (Hallmark Group) to enter into the general ledger and produce landowner invoices. Fees per acre foot are predetermined annually by the Board of Directors. Revenue recorded in the general ledger is balanced to the Groundwater Extraction Fee Tables.
  - Max McNally (Woodard & Curran) develops the invoices for grant reimbursements and submits them to DWR. A copy of the draw invoice is provided to Jacqueline Harris to enter the transaction in the general ledger. Revenue from grant reimbursements is predetermined by a grant agreement with DWR.
- All recorded revenue is offset by entries to accounts receivable delineated by specific landowners and DWR.
- Revenue from all sources is projected for each fiscal year and is reviewed and approved by the Board of Directors in the form of an annual budget.
- Monthly financial statements (including statements of net position, changes in net position, receipts and disbursements, and accounts receivable and payable aging reports) are prepared, reviewed by Taylor Blakslee, and reported to the Board of Directors at every Board meeting.

### **Current Process – Cash Receipts**

- Payments from landowners and DWR are received by mail; payments from Santa Barbara County for GWE fees are received via ACH direct deposit to the Agency's bank account. The Agency only accepts checks and ACH transactions; no cash is received. Mail is received in Sacramento and processed by Jacqueline Harris. Ms. Harris immediately scans all checks as soon as they are received and deposits the checks via a Remote Deposit Capture (RDC) machine provided by Chase bank. Ms. Harris then enters the payments into the general ledger clearing the open receivable balances. Bank statements are reconciled monthly.



- The segregation of duties with respect to cash receipts is limited with limited staff. Additional procedures have been instituted to mitigate the potential for fraud and/or misappropriation of assets such as the following:
  - Payments received are the product of invoiced revenue; the determination of that revenue is not the responsibility of Ms. Harris as discussed above.
  - Revenues and receivable balances are reported monthly in the financial statements.
  - All cash receipts and disbursements are reported in detail in the monthly financial statements.
  - Financial statements are reviewed by the Board of Directors at every Board meeting.

#### **Alternative Process for Consideration**

- The address for payments could be changed to the Bakersfield office where responsibility for scanning checks and making deposits would be assigned to Mr. Blakslee. Mr. Blakslee would then forward scanned copies of payments to Ms. Harris for entry into the general ledger.

#### **Additional Processes for Consideration**

- Designation by the Board of a member to provide management oversight of Ms. Harris' responsibilities to include:
  - Receipt and review of the annual Groundwater Extraction Fee Table from Mr. Blakslee, and corresponding statement of change in net position and accounts receivable aging after transactions are entered from Ms. Harris.
  - Receipt review of quarterly grant reimbursement invoices from Mr. McNally, and corresponding statement of change in net position and accounts receivable aging after transactions are entered from Ms. Harris.
  - Receipt and review of bank deposits with scanned checks.
  - Monthly review of receipts and disbursements report from the accounting records in connection with the accounts receivable aging report and the bank statement and reconciliation for the same time period.



TO: Board of Directors  
Agenda Item No. 15a

FROM: Taylor Blakslee, Hallmark Group

DATE: March 5, 2025

SUBJECT: Report of the Executive Director

**Recommended Motion**

None – information only.

**Discussion**

Progress and next steps for the Hallmark Group for December 2024 and January 2025, and an overview of consultant budget-to-actuals are provided as **Attachment 1**.

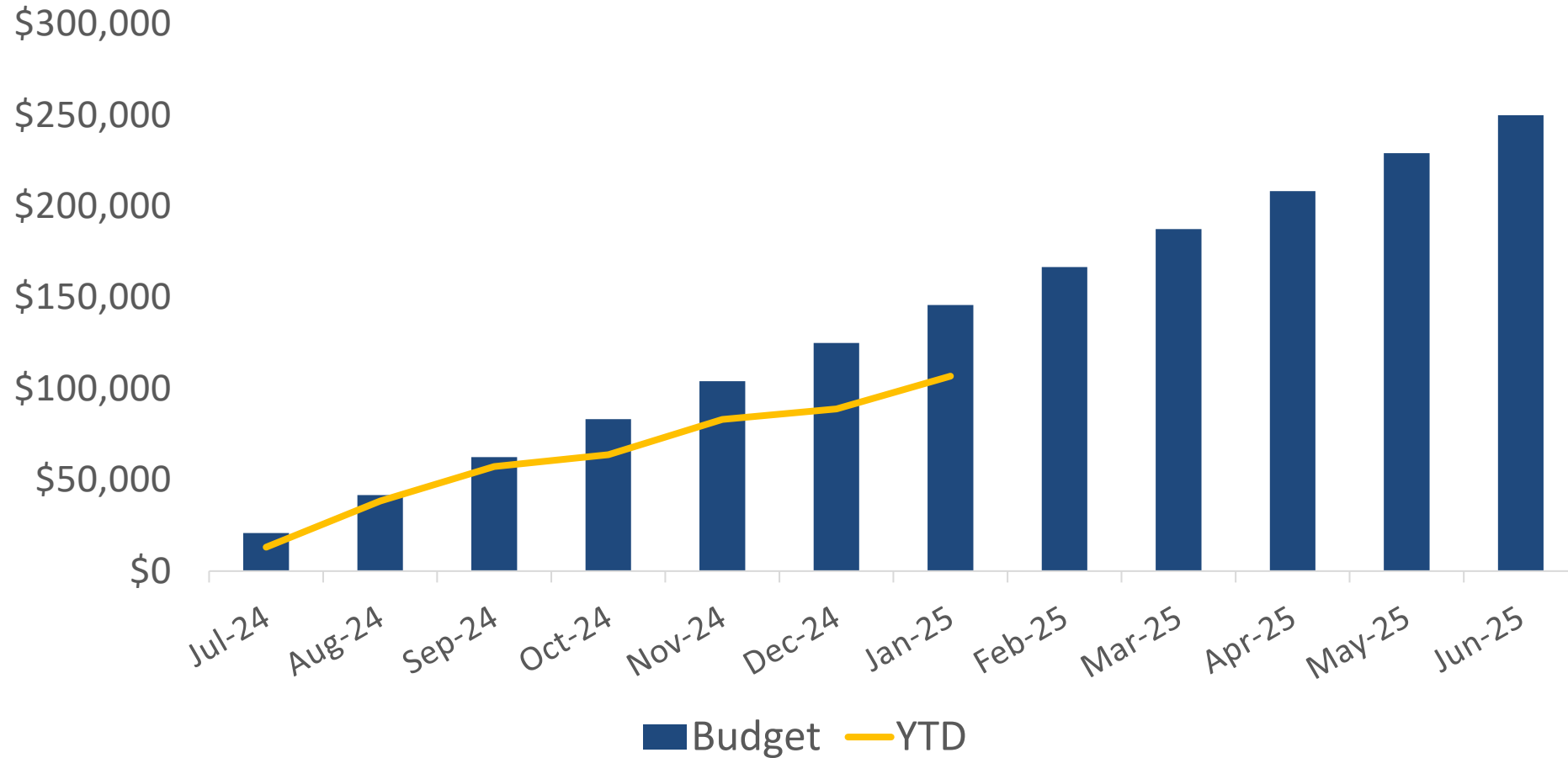
# Cuyama Basin Groundwater Sustainability Agency

## Financial Report

March 2025

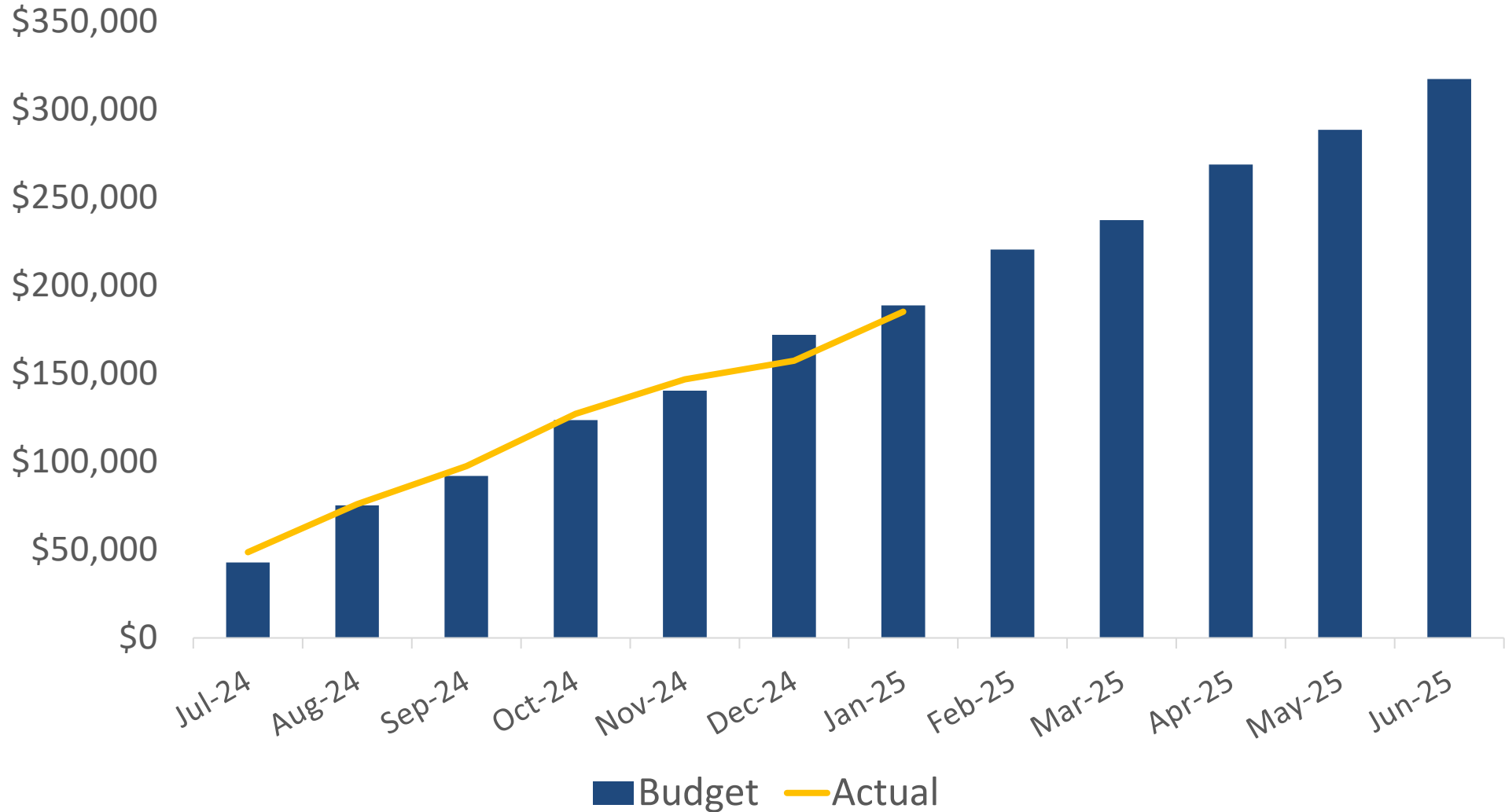
# Legal Counsel – Budget-to-Actuals

FY 24/25



# Hallmark Group – Budget-to-Actuals

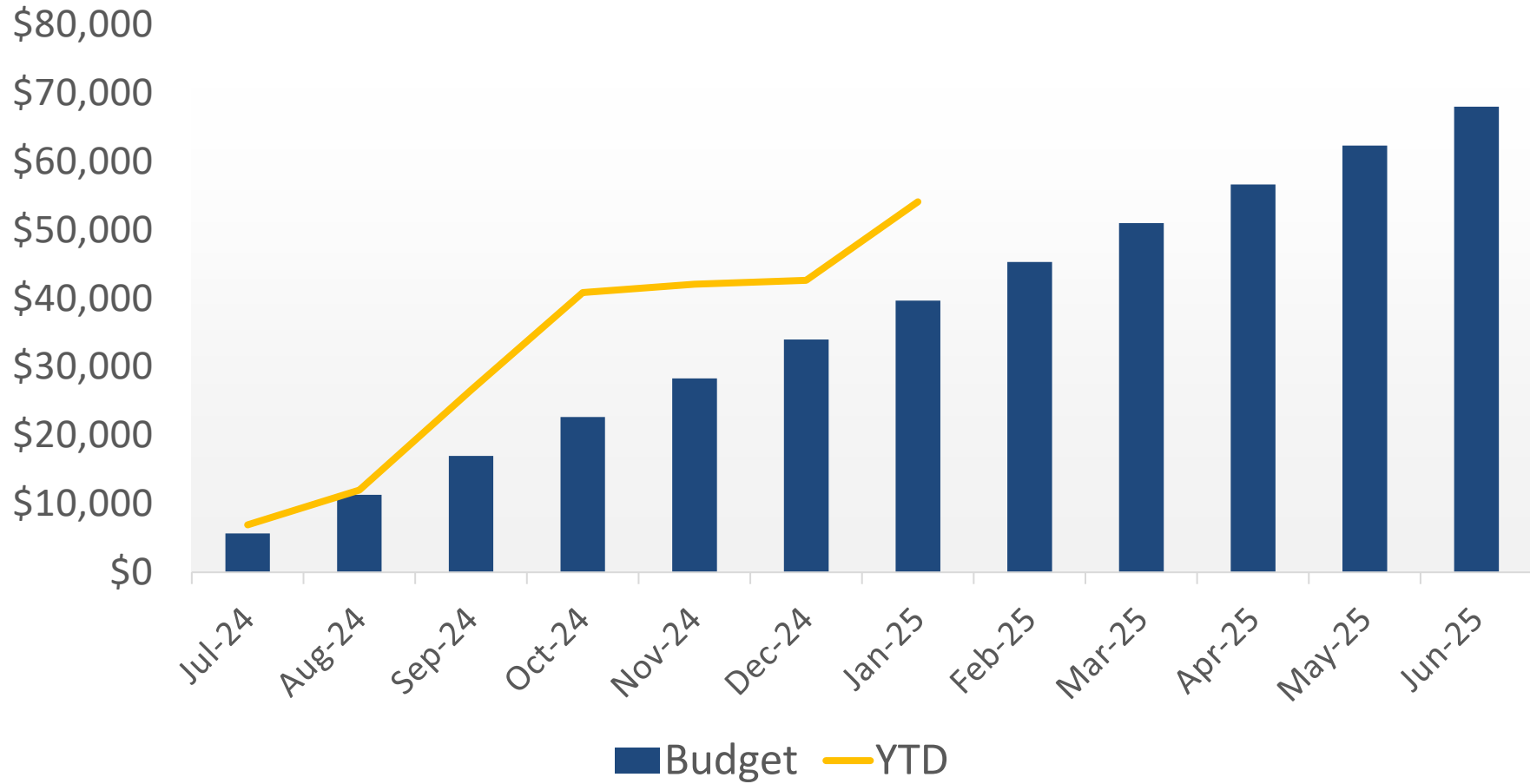
FY 24/25





# Provost & Pritchard – Budget-to-Actuals

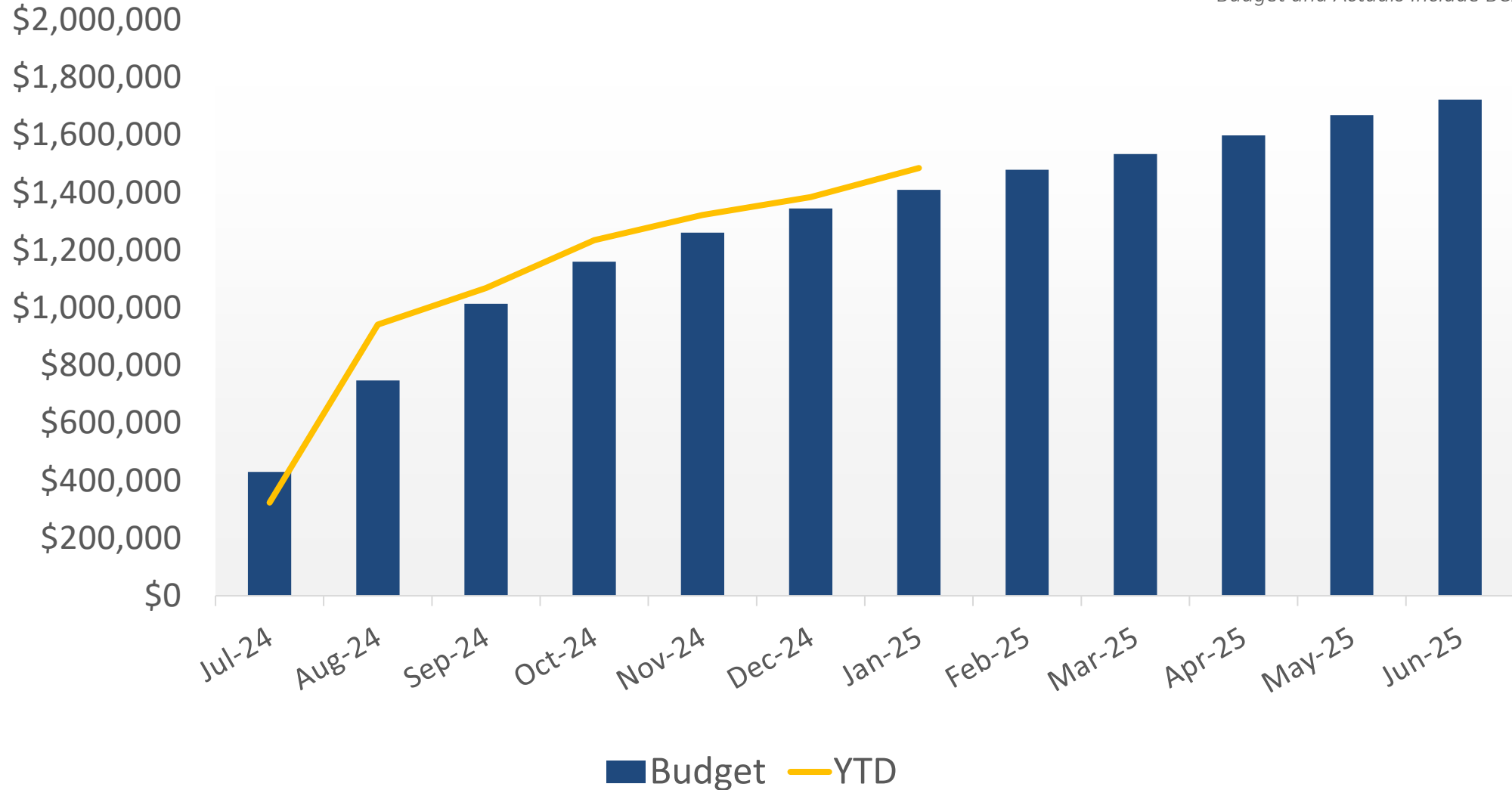
FY 24/25



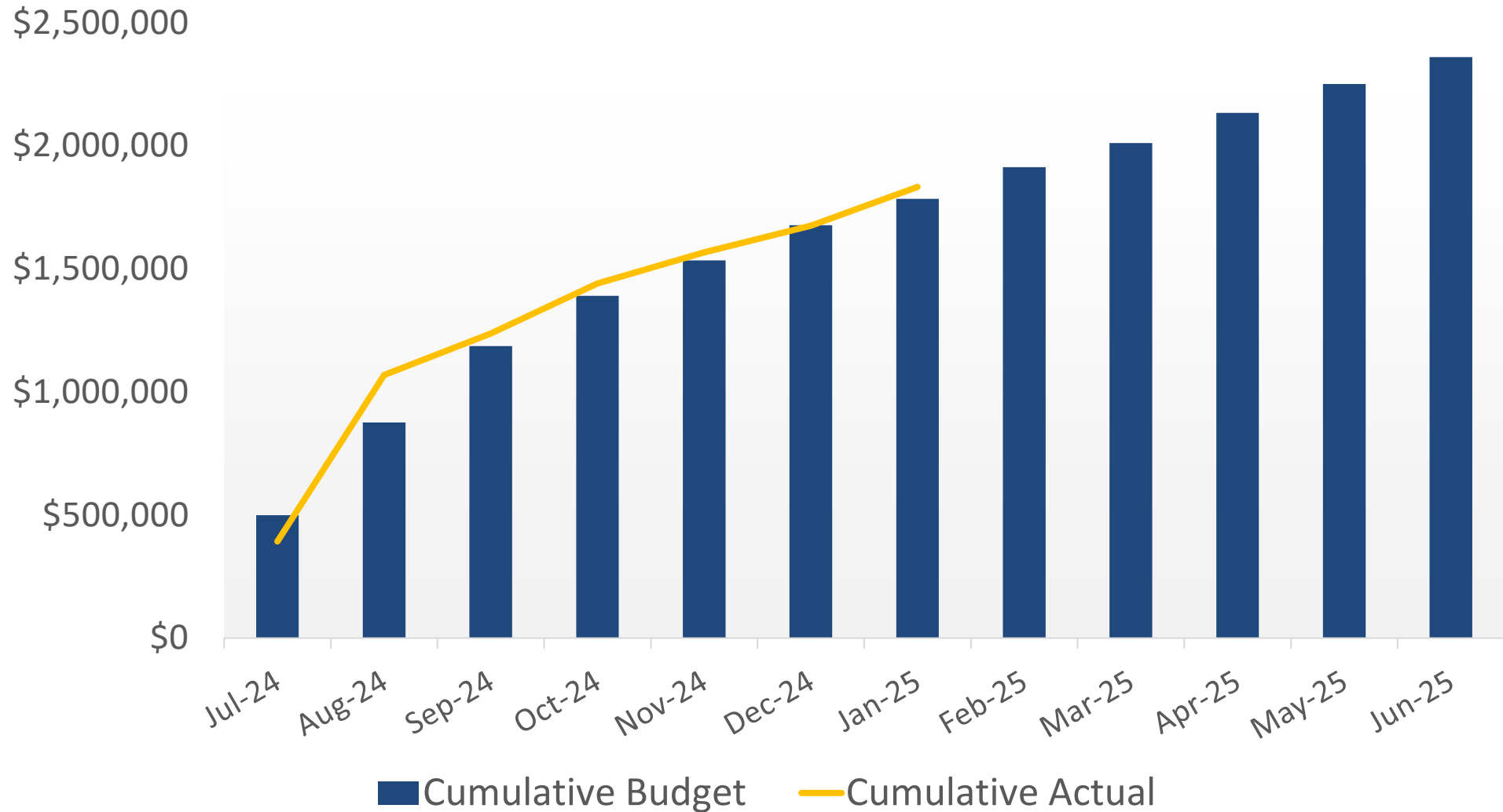
# Woodard & Curran – Budget-to-Actuals

FY 24/25

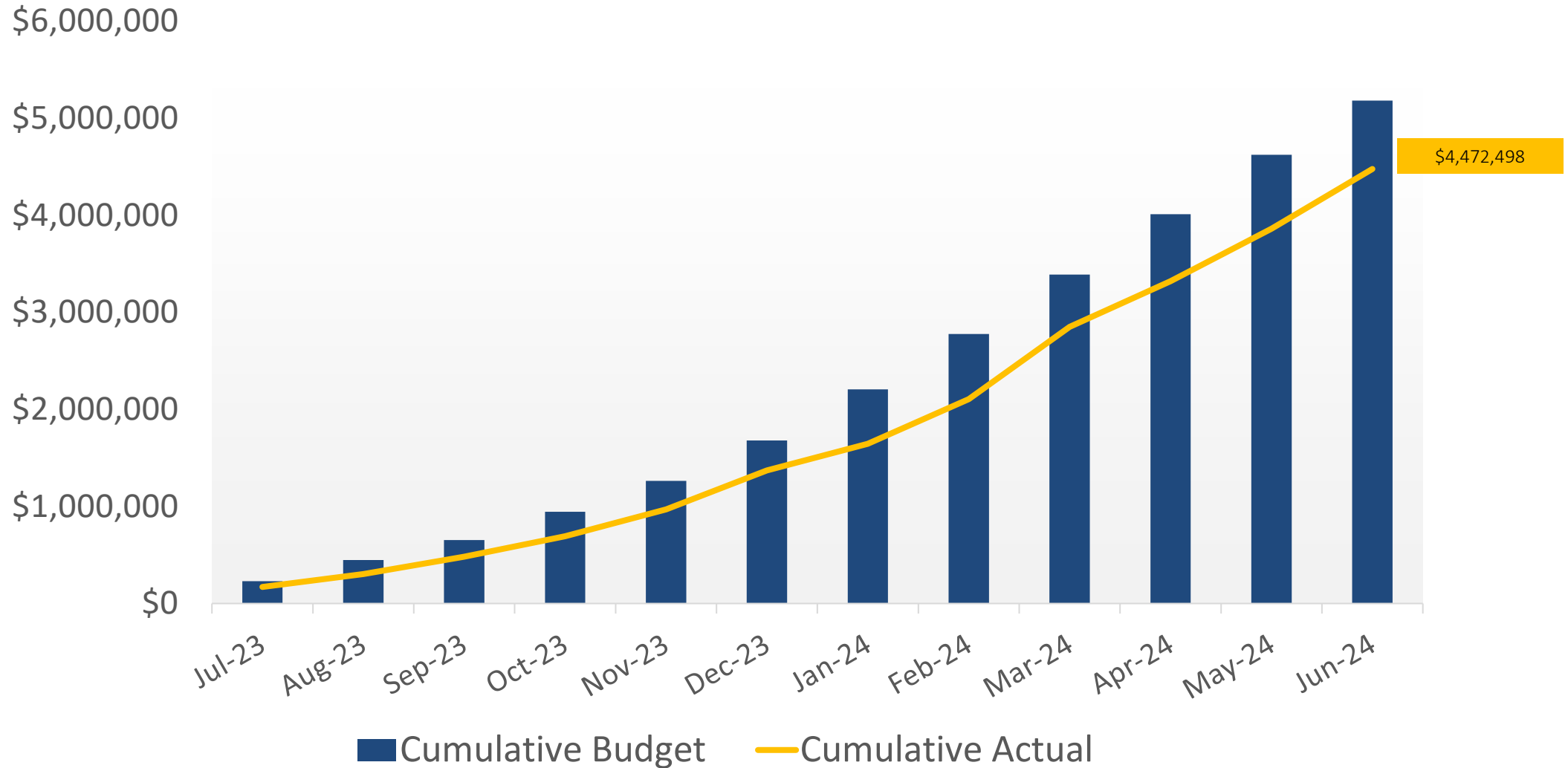
*Budget and Actuals Include BC2 Environmental*



# CBGSA FY 24/25 – Budget-to-Actuals



# CBGSA FY 23/24 – Budget-to-Actuals





TO: Board of Directors  
Agenda Item No. 16a

FROM: Brian Van Lienden, Woodard & Curran

DATE: March 5, 2025

SUBJECT: Update on Groundwater Sustainability Plan Activities

**Recommended Motion**

None – information only.

**Discussion**

Cuyama Basin Groundwater Sustainability Agency (CBGSA) Groundwater Sustainability Plan (GSP) activities and consultant Woodard & Curran's (W&C) accomplishments are provided as **Attachment 1**.



# Jan-Feb Accomplishments

- ✓ Prepared final 2025 GSP Update and Periodic Evaluation documents for the Cuyama Basin and submitted to dWR
- ✓ Facilitated agreements for potential new CIMIS stations
- ✓ Developed groundwater conditions report for January 2025
- ✓ Completed cloud seeding study for the Cuyama Valley
- ✓ Prepared final allocation tables for 2025-2029 for Central Management Area
- ✓ Performed updates to Data Management System



TO: Board of Directors  
Agenda Item No. 16b

FROM: Brian Van Lienden, Woodard & Curran

DATE: March 5, 2025

SUBJECT: Update on Grant-Funded Projects

**Recommended Motion**

None – information only.

**Discussion**

An update on Cuyama Basin Groundwater Sustainability Agency (CBGSA) grant-funded projects is provided as **Attachment 1**.

# Updates on Grant Funded Projects

- The 2025 GSP Update and Periodic Evaluation were submitted to the CA Department of Water Resources in January 2025
  - Comments can be submitted via the DWR SGMA portal by April 20, 2025
- Transducer installation in newly installed wells
  - Currently working to procure transducers to install in each well
  - Installation expected in March or April 2025
- Cloud seeding study report is complete
- Under development with expected completion by March 2025:
  - Fault investigation report
  - Data Management System update



TO: Board of Directors  
Agenda Item No. 16c

FROM: Brian Van Lienden, Woodard & Curran

DATE: March 5, 2025

SUBJECT: Update on January 2025 Groundwater Conditions Report

**Recommended Motion**

None – information only.

**Discussion**

The quarterly Groundwater Conditions Report for January 2025 is summarized as **Attachment 1**. The detailed report is provided as **Attachment 2**.



# Cuyama Basin Groundwater Sustainability Agency

## 16c. Update on Quarterly Groundwater Conditions Report

March 5, 2025

*January 2025  
Report*

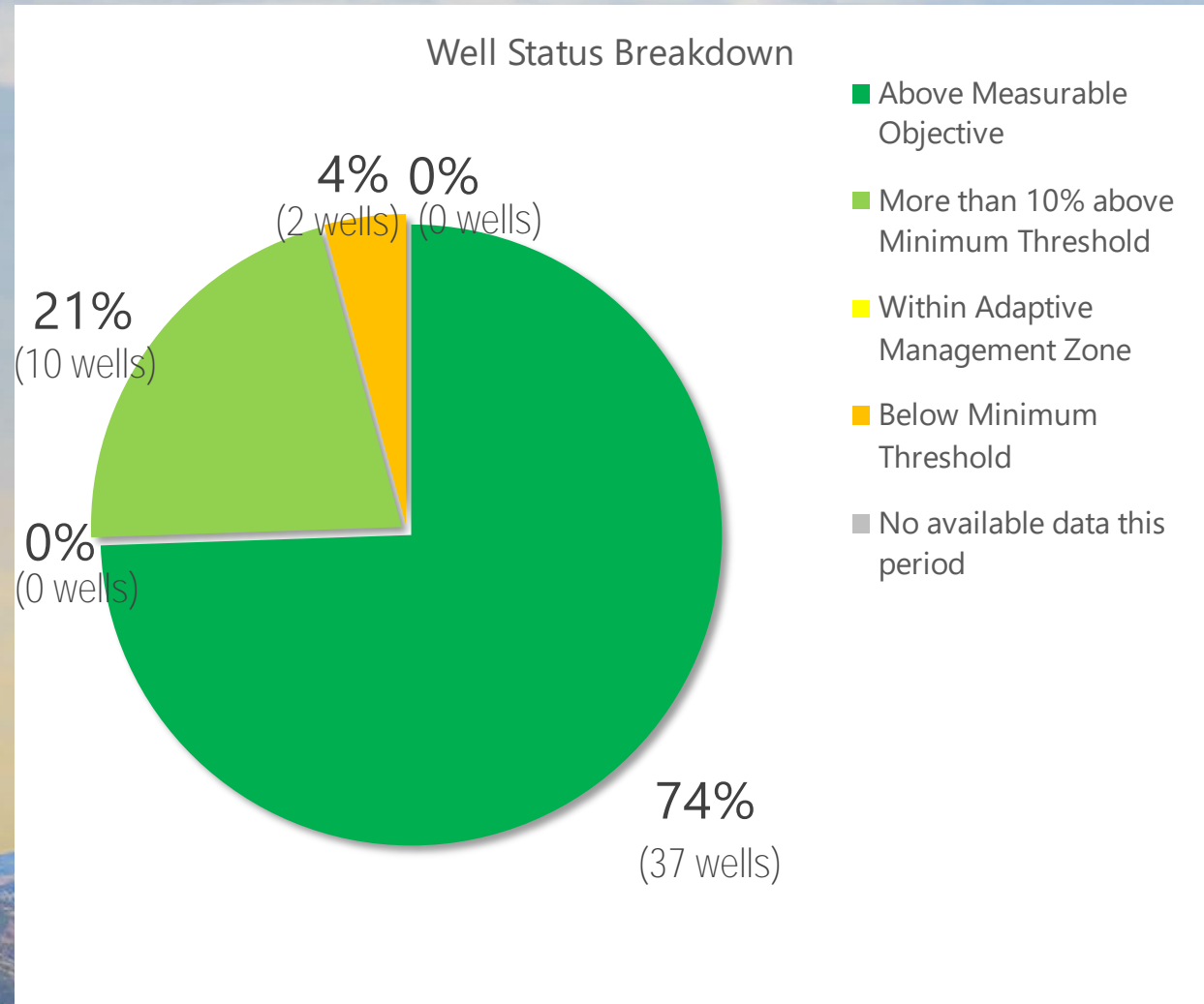


# Groundwater Levels Monitoring Network – Summary of Current Conditions

- Monitoring data from July 2024, October 2024 and January 2025 for representative wells is included in the Groundwater Conditions report
- The Groundwater Conditions report reflects the updated monitoring network and minimum thresholds approved by the CBGSA Board for the 2025 GSP Update:
  - All 47 representative monitoring wells have levels data at least once in the previous 12 months
  - 2 wells were below the updated minimum threshold based on latest measurement since April 2024

# Summary of Groundwater Well Levels as Compared To Sustainability Criteria

- 2 wells are currently below the updated minimum threshold (MT)
  - 2 wells (4%) have been below the MT for at least 24 months
  - 0 wells dropped below the MT in January 2025
  - 3 wells moved above the MT in January 2025

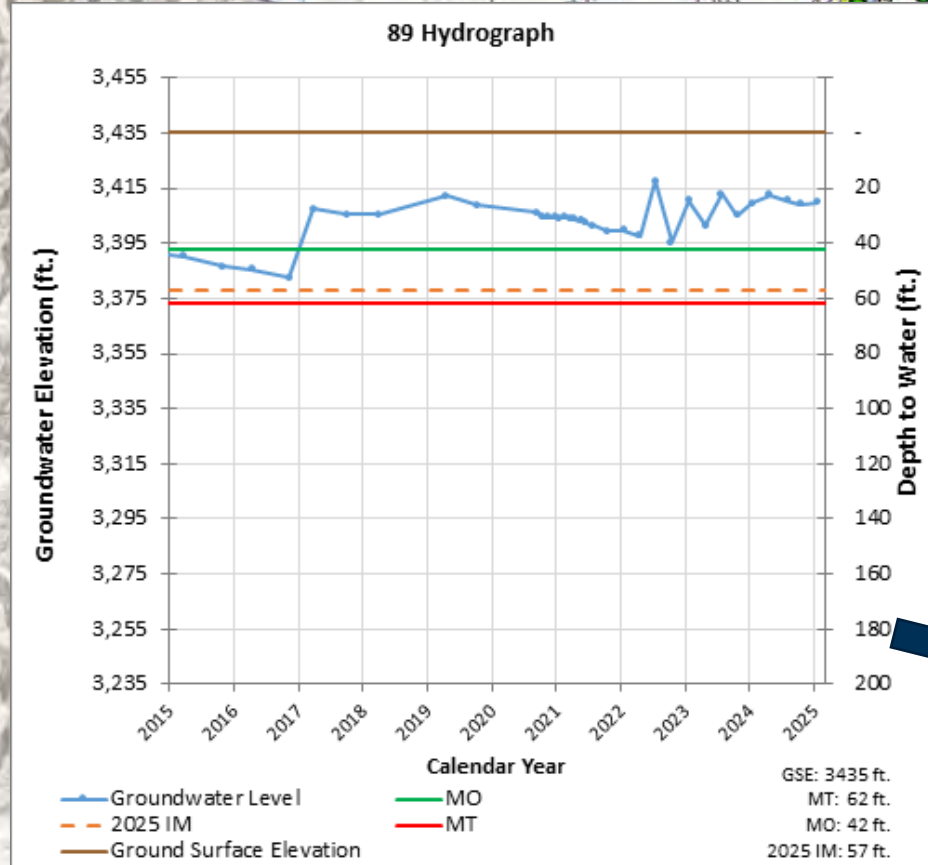
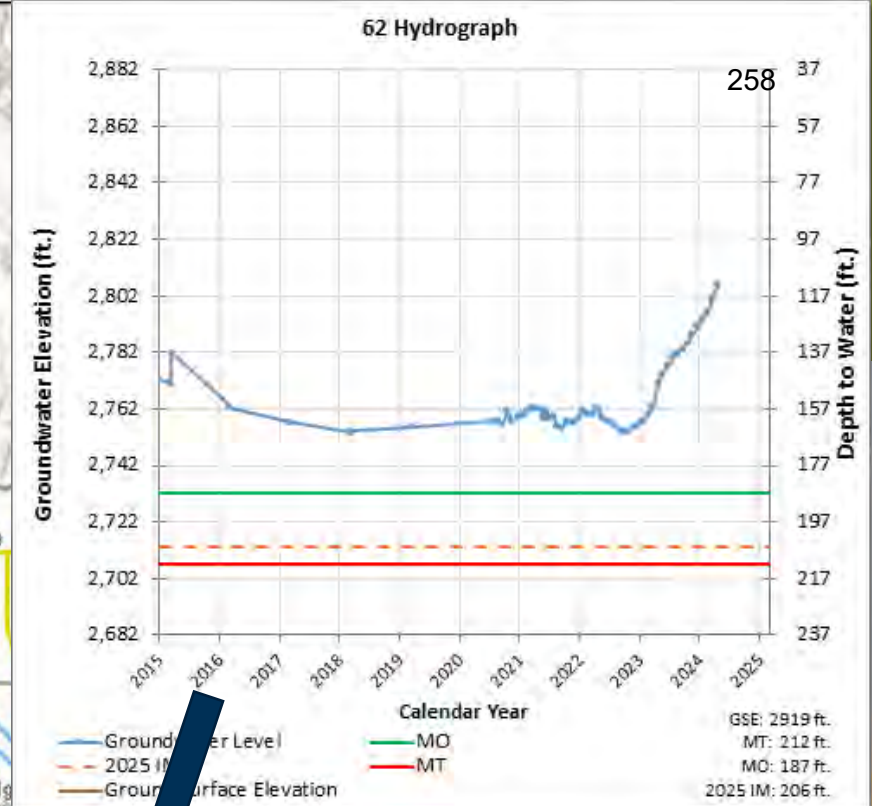
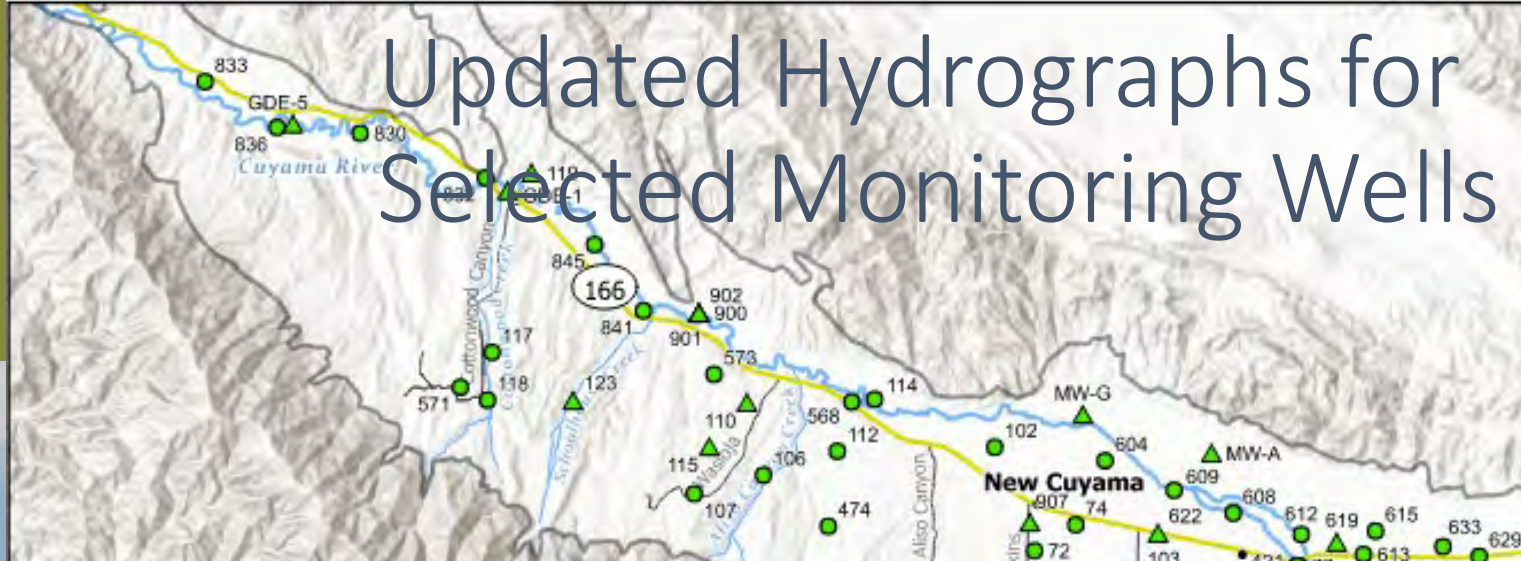






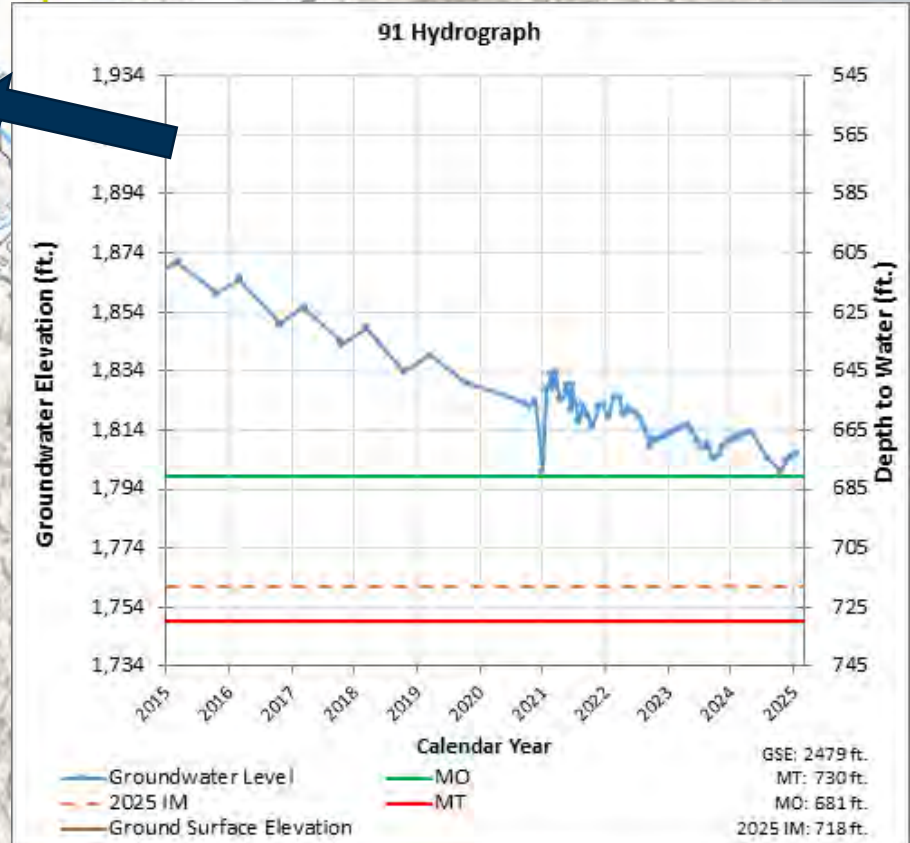
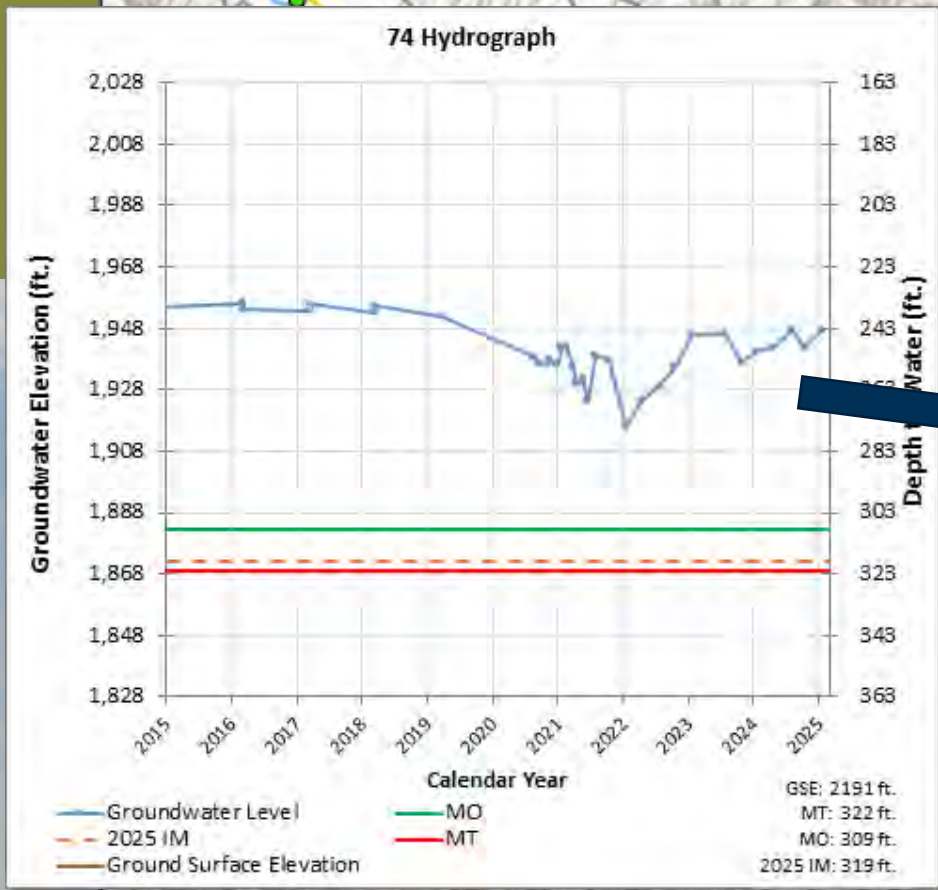


# Updated Hydrographs for Selected Monitoring Wells



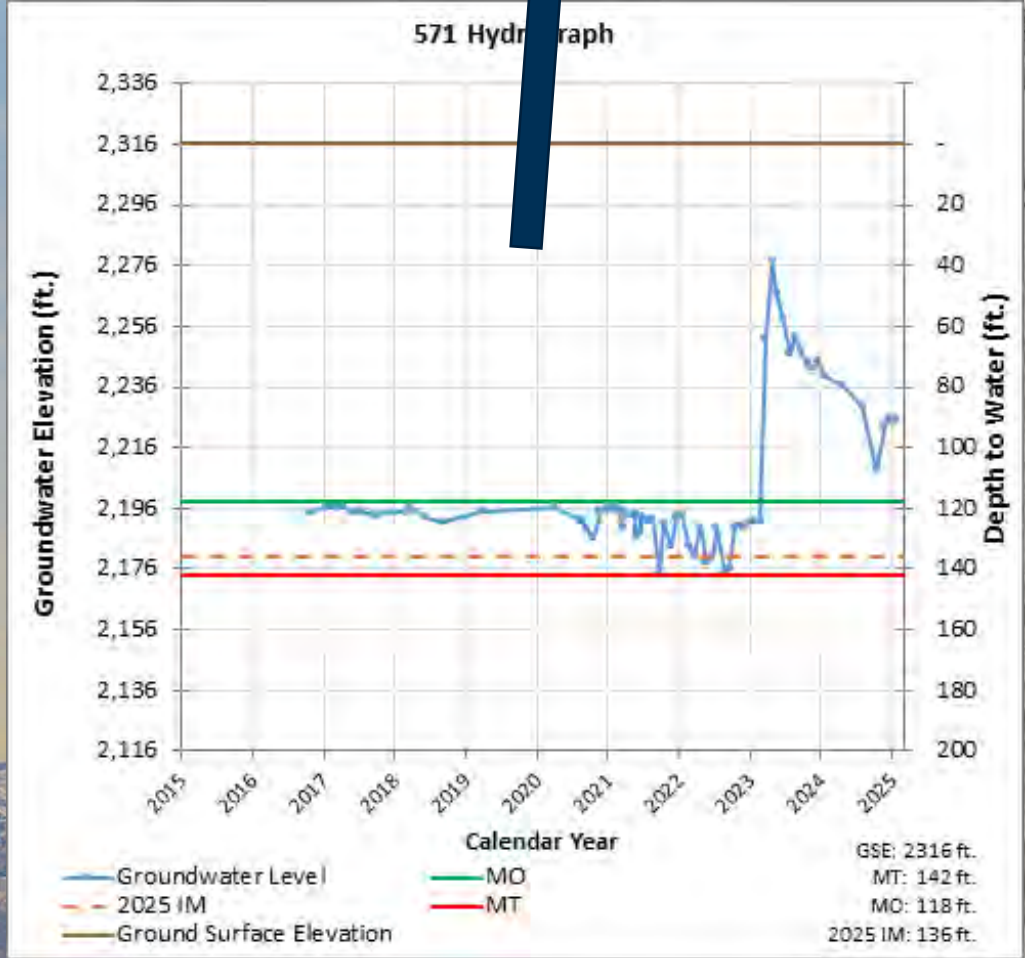


# Updated Hydrographs for Selected Monitoring Wells





# Updated Hydrographs for Selected Monitoring Wells



33





**GROUNDWATER  
CONDITIONS  
REPORT –  
CUYAMA VALLEY  
GROUNDWATER  
BASIN**

January 2025

801 T Street  
Sacramento, CA  
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**Cuyama Basin  
Groundwater  
Sustainability Agency**

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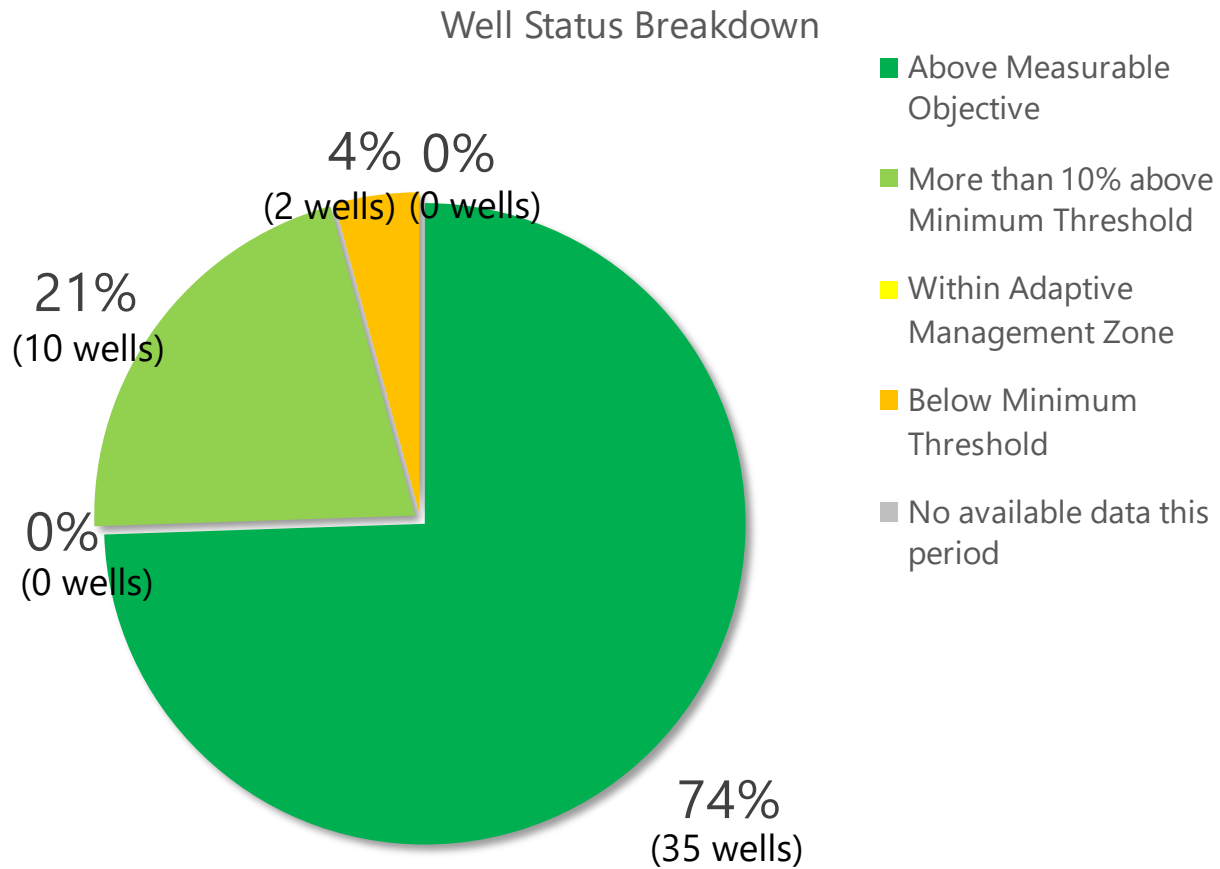
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## 1. INTRODUCTION

This report is intended to provide an update on the current groundwater level conditions in the Cuyama Valley Groundwater Basin. This work is completed by the Cuyama Basin Groundwater Sustainability Agency (CBGSA), in compliance with the Sustainable Groundwater Management Act (SGMA).

## 2. SUMMARY STATISTICS



There are currently 2 wells with groundwater levels exceeding the updated minimum thresholds. As outlined in the GSP, undesirable results for the chronic lowering of groundwater levels occurs, “when 30 percent of representative monitoring wells... fall below their minimum groundwater elevation threshold for two consecutive years.” (Cuyama GSP, pg. 3-2). Currently, 4% of representative monitoring wells (i.e. 2 wells) have exceeded the minimum threshold for 24 or more consecutive months.

### 3. CURRENT CONDITIONS

Table 1 includes the most recent groundwater level measurements taken in the Cuyama Basin from representative wells included in the Cuyama GSP Groundwater Level Monitoring Network, as well as the previous two measurements and the measurement from the same time period in the previous year. Table 2 includes all of the wells and their current status in relation to the thresholds applied to each well. This information is also shown on Figure 1.

All measurements are also incorporated into the Cuyama DMS, which may be accessed at <https://opti.woodardcurran.com/cuyama/login.php>.



**Table 1: Recent Groundwater Levels for Representative Monitoring Network**

Well	Region	Jul-24	Oct-24	Jan-25	Last Year		Elevation Change
		GWL (ft. msl)	GWL (ft. msl)	GWL (ft. msl)	GWL (ft. msl)	Month/Year	
72	Central	-	2005	2034	2027	Jan-24	7.4
74	Central	1947	1942	1947	1940	Jan-24	6.6
77	Central	1754	1766	1791	1804	Jan-24	-12.7
91	Central	1804	1800	1806	1811	Jan-24	-5.1
95	Central	1868	1867	1867	1850	Jan-24	17.5
96	Central	2266	2266	2266	2273	Jan-24	-7.2
99	Central	2137	2145	2212	2216	Jan-24	-4
102	Central	-	1671	1763	-	-	-
103	Central	2046	2051	2054	2046	Jan-24	8.1
112	Central	2042	2043	2043	2041	Jan-24	1.8
114	Central	1881	1878	1879	1879	Jan-24	-0.2
316	Central	1804	1800	1804	1810	Jan-24	-5.6
317	Central	1806	1802	1806	1811	Jan-24	-5.3
322	Central	2134	2138	2211	2216	Jan-24	-4.5
324	Central	2168	2169	2210	2215	Jan-24	-4.6
325	Central	2194	2193	2211	2215	Jan-24	-3.9
420	Central	1750	1766	1791	1803	Jan-24	-11.8
421	Central	1778	1781	1795	1802	Jan-24	-6.7
474	Central	2234	2235	2234	2228	Jan-24	5.8
568	Central	1873	1858	1873	1874	Jan-24	-0.9

Well	Region	Jul-24	Oct-24	Jan-25	Last Year		Elevation Change
		GWL (ft. msl)	GWL (ft. msl)	GWL (ft. msl)	GWL (ft. msl)	Month/Year	
604	Central	1661	1650	1667	1655	Jan-24	12
608	Central	1740	1769	1790	-	-	-
609	Central	1691	1722	1725	1721	Jan-24	3.5
610	Central	1797	1795	1801	1808	Jan-24	-6.8
612	Central	1780	1805	1803	1797	Jan-24	6
613	Central	1814	1818	-	1799	Jan-24	-
615	Central	1794	1805	1795	1808	Jan-24	-12.6
629	Central	1791	1800	1802	1817	Jan-24	-15.4
633	Central	1794	1805	-	1796	Jan-24	-
62	Eastern	-	-	-	2793	Jan-24	-
85	Eastern	2902	2907	2908	2883	Jan-24	25
100	Eastern	2939	2935	2930	2911	Jan-24	18.5
101	Eastern	2654	2655	2671	2653	Jan-24	18.3
841	Northwestern	1695	1688	1704	1706	Jan-24	-2
845	Northwestern	1632	1632	1642	1641	Jan-24	0.9
2	Southeastern	3704	3686	3699	3697	Jan-24	1.8
89	Southeastern	3411	3409	3410	3390	Jan-24	20.5
106	Western	2176	2176	2176	2175	Jan-24	1.3
107	Western	2421	2419	2418	2422	Jan-24	-4.4
117	Western	1945	1945	1944	1947	Jan-24	-2.8
118	Western	2212	2212	2212	2211	Jan-24	0.6

Well	Region	Jul-24	Oct-24	Jan-25	Last Year		Elevation Change
		GWL (ft. msl)	GWL (ft. msl)	GWL (ft. msl)	GWL (ft. msl)	Month/Year	
571	Western	2230	2209	2225	2240	Jan-24	-15.1
573	Western	2012	2012	2012	2010	Jan-24	2.3
830	Far-West Northwestern	1515	-	-	1512	Jan-24	-
832	Far-West Northwestern	1606	1605	1605	1604	Jan-24	1.1
833	Far-West Northwestern	1435	1436	1436	1433	Jan-24	3.4
836	Far-West Northwestern	1478	1477	1477	1479	Jan-24	-1.6

**\*Well 608 is now confirmed to be “destroyed” and is no longer available for monitoring. The landowner and monitoring staff have identified a well within 100 ft that is suitable to continue monitoring in this location, and the groundwater level monitoring network will be modified to remove well 608 and add in this new well. The new well is in the process of being incorporated into Opti and being assigned an ID number.**

**Table 2: Well Status Related to Thresholds**

Well	Region	Current Month		Minimum Threshold	Within 10% Minimum Threshold	Measurable Objective	Well Depth	Status	GSA Action Required?
		GWL (DTW)	Date						
72	Central	132	1/15/2025	373	369	328	790	Above Measurable Objective	No
74	Central	241	1/15/2025	322	321	309	-	Above Measurable Objective	No
77	Central	493	1/16/2025	514	509	464	980	More than 10% above Minimum Threshold	No
91	Central	675	1/17/2025	730	725	681	980	Above Measurable Objective	No
95	Central	589	1/17/2025	597	594	562	805	More than 10% above Minimum Threshold	No
96	Central	340	1/17/2025	369	368	361	500	Above Measurable Objective	No
99	Central	294	1/15/2025	379	378	368	750	Above Measurable Objective	No
102	Central	278	1/16/2025	470	466	432	-	Above Measurable Objective	No
103	Central	230	1/15/2025	379	374	324	1030	Above Measurable Objective	No
112	Central	83	1/16/2025	102	102	100	441	Above Measurable Objective	No
114	Central	46	1/16/2025	58	58	56	58	Above Measurable Objective	No
316	Central	676	1/17/2025	731	726	682	830	Above Measurable Objective	No
317	Central	675	1/17/2025	700	695	650	700	More than 10% above Minimum Threshold	No
322	Central	295	1/15/2025	387	386	378	850	Above Measurable Objective	No
324	Central	296	1/15/2025	365	364	353	560	Above Measurable Objective	No
325	Central	295	1/15/2025	331	330	323	380	Above Measurable Objective	No
420	Central	494	1/16/2025	514	509	464	780	More than 10% above Minimum Threshold	No



Well	Region	Current Month		Minimum Threshold	Within 10% Minimum Threshold	Measurable Objective	Well Depth	Status	GSA Action Required?
		GWL (DTW)	Date						
421	Central	490	1/16/2025	514	509	466	620	More than 10% above Minimum Threshold	No
474	Central	128	1/16/2025	197	195	178	213	Above Measurable Objective	No
568	Central	35	1/16/2025	47	47	46	188	Above Measurable Objective	No
604	Central	449	1/16/2025	544	540	505	924	Above Measurable Objective	No
608	Central	420	1/16/2025	504	501	475	745	Above Measurable Objective	No
609	Central	433	1/16/2025	499	495	462	970	Above Measurable Objective	No
610	Central	636	1/17/2025	557	554	527	780	Below Minimum Threshold (54 months)	No
612	Central	466	1/16/2025	513	511	490	1070	Above Measurable Objective	No
613	Central	-	-	578	575	550	830	No available data this period (Above MO in October 2024)	No
615	Central	525	1/16/2025	588	585	556	865	Above Measurable Objective	No
629	Central	576	1/16/2025	613	610	581	1000	Above Measurable Objective	No
633	Central	-	-	605	600	551	1000	No available data this period (More than 10% above MT October 2024)	No
62	Eastern	-	-	212	210	187	212	No available data this period (Above MO in April 2024)	No
85	Eastern	140	1/15/2025	200	198	176	233	Above Measurable Objective	No
100	Eastern	76	1/15/2025	186	183	157	284	Above Measurable Objective	No
101	Eastern	75	1/15/2025	138	136	115	200	Above Measurable Objective	No
841	Northwestern	55	1/20/2025	203	198	153	600	Above Measurable Objective	No
845	Northwestern	67	1/20/2025	203	198	153	380	Above Measurable Objective	No





Well	Region	Current Month		Minimum Threshold	Within 10% Minimum Threshold	Measurable Objective	Well Depth	Status	GSA Action Required?
		GWL (DTW)	Date						
2	Southeastern	21	1/15/2025	52	50	35	73	Above Measurable Objective	No
89	Southeastern	24	1/15/2025	62	60	42	125	Above Measurable Objective	No
106	Western	141	1/16/2025	164	163	152	228	Above Measurable Objective	No
107	Western	73	1/16/2025	122	120	103	200	Above Measurable Objective	No
117	Western	154	1/16/2025	163	162	154	212	More than 10% above Minimum Threshold	No
118	Western	50	1/16/2025	40	37	10	500	Below Minimum Threshold (52 months)	No
571	Western	90	1/16/2025	142	140	118	280	Above Measurable Objective	No
573	Western	66	1/16/2025	93	88	42	404	More than 10% above Minimum Threshold	No
830	Far-West Northwestern	-	-	63	63	60	77	Above Measurable Objective (above MO in July 2024)	No
832	Far-West Northwestern	32	1/16/2025	50	49	35	132	Above Measurable Objective	No
833	Far-West Northwestern	18	1/15/2025	48	44	10	504	More than 10% above Minimum Threshold	No
836	Far-West Northwestern	29	1/15/2025	49	45	10	325	More than 10% above Minimum Threshold	No

\*Well 608 is now confirmed to be “destroyed” and is no longer available for monitoring. The landowner and monitoring staff have identified a well within 100 ft that is suitable to continue monitoring in this location, which is where the measurement shown was taken. The groundwater level representative network will be modified to remove well 608 and add in this new well. The new well is in the process of being incorporated into Opti and being assigned an ID number.

Note: Wells only count towards the identification of undesirable results if the level measurement is below the minimum threshold for 24 consecutive months.



#### 4. HYDROGRAPHS

The following hydrographs provide an overview of conditions in each of the six areas threshold regions identified in the GSP.

**Figure 2: Southeast Region – Well 89**

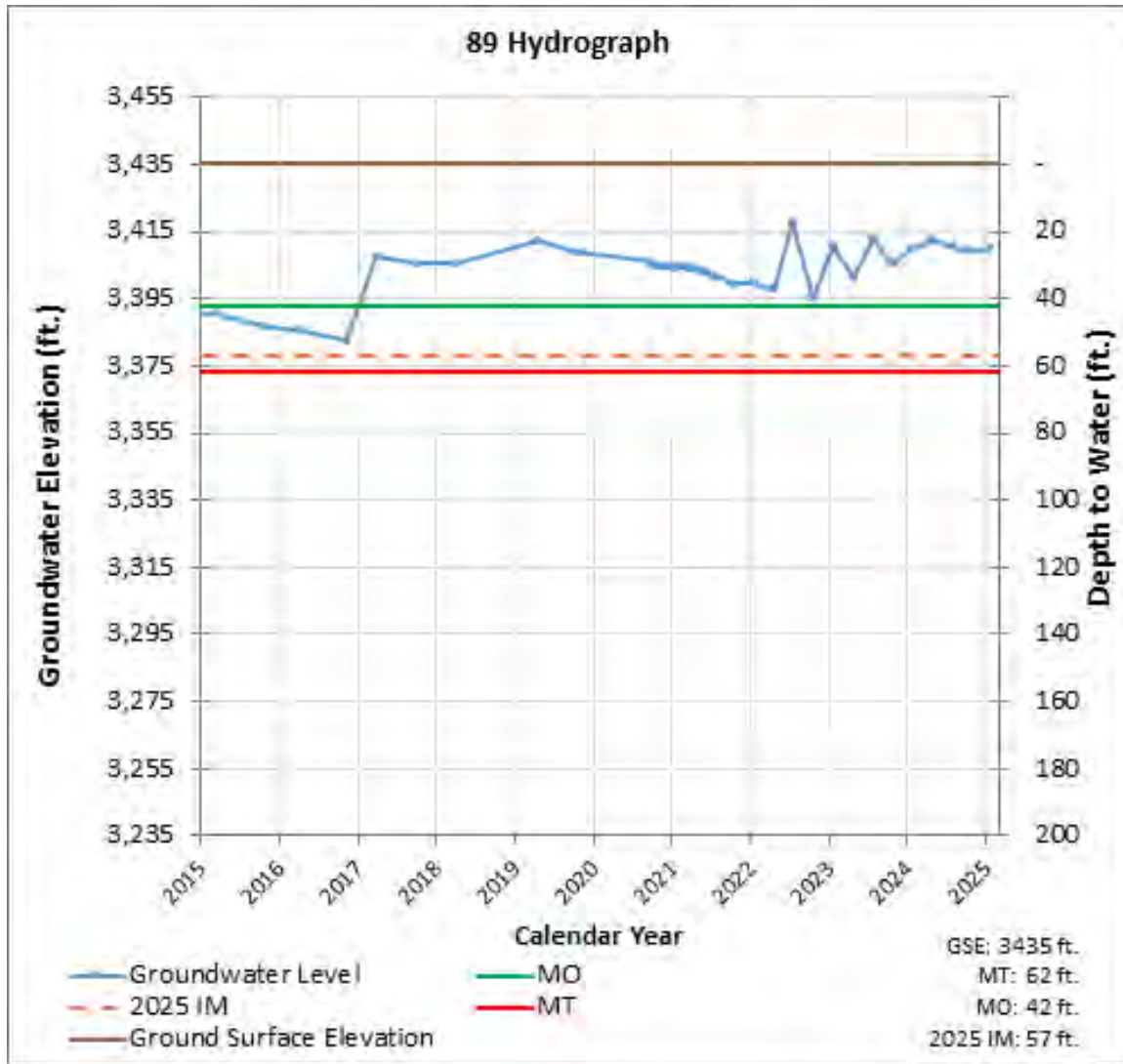


Figure 3: Eastern Region – Well 62

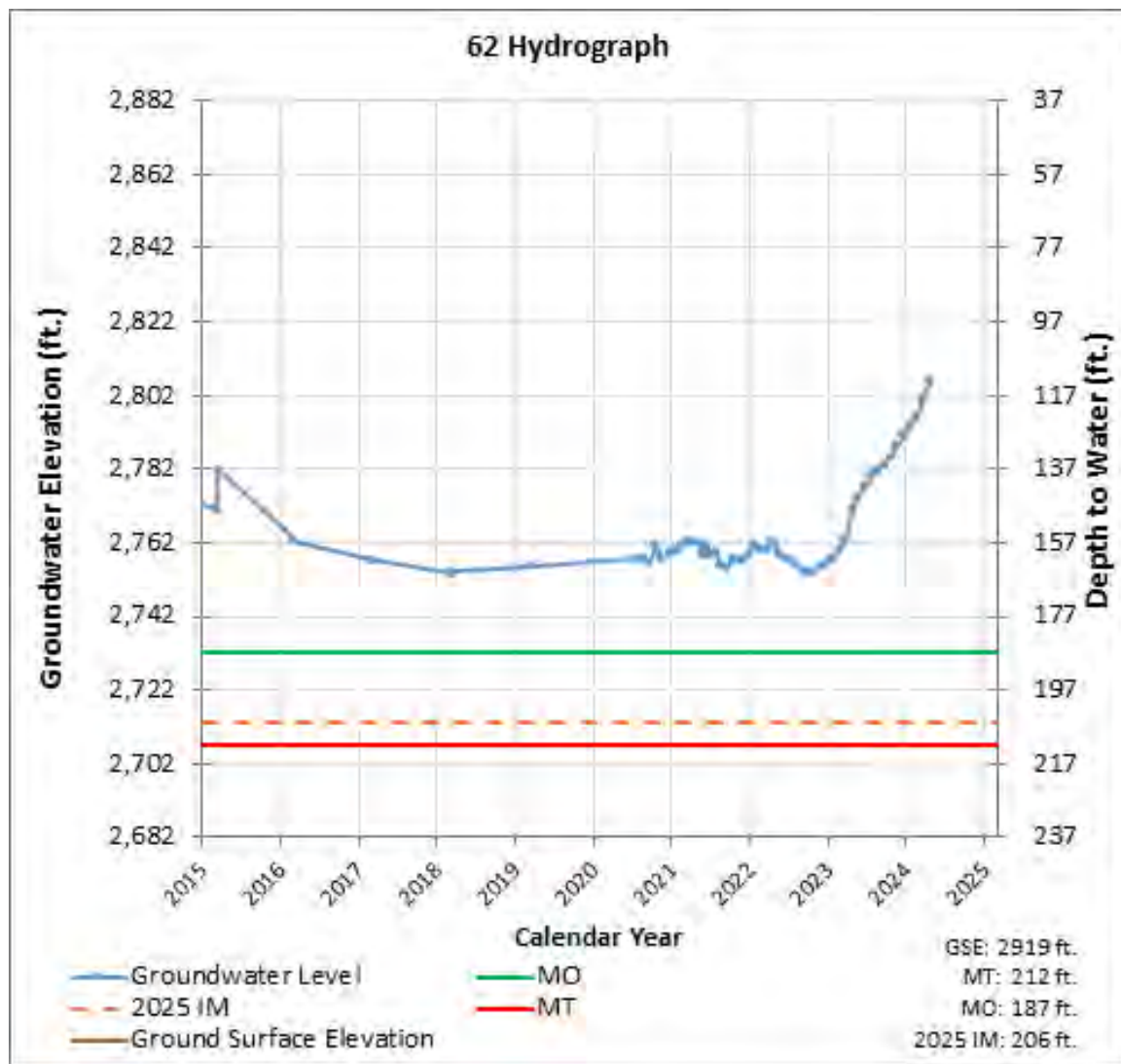




Figure 4: Central Region – Well 91

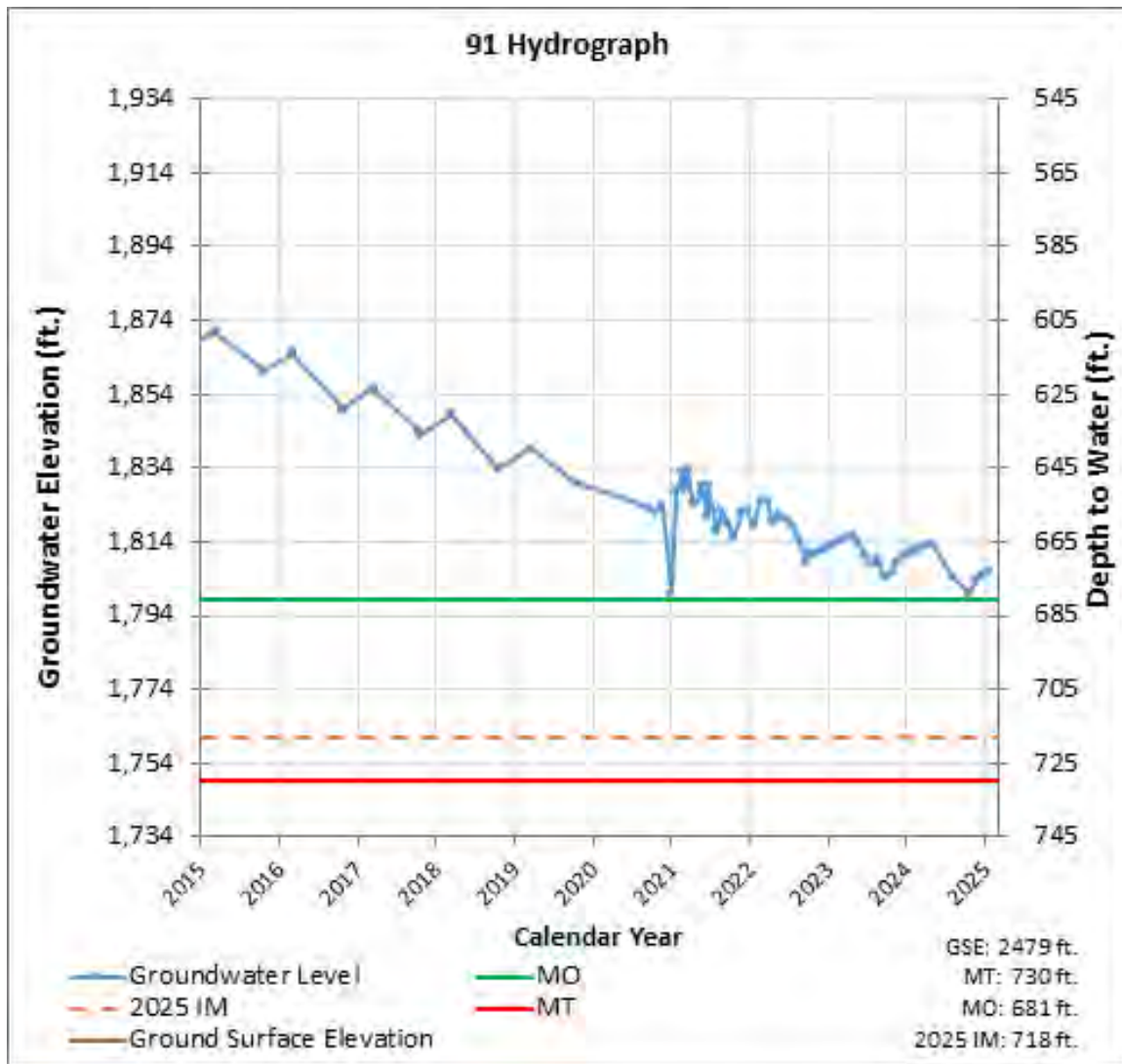




Figure 5: Central Region – Well 74

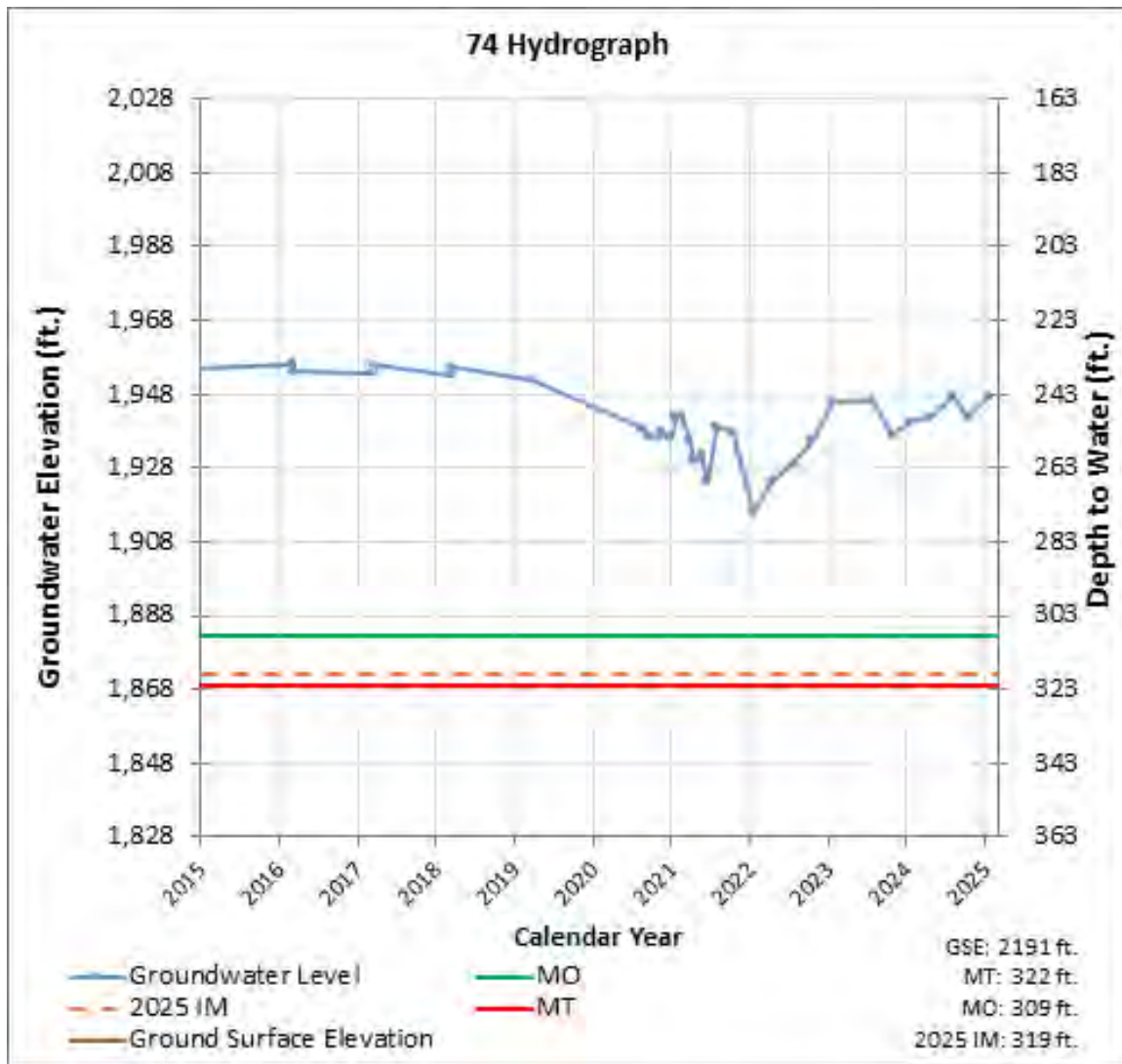


Figure 6: Western Region – Well 571

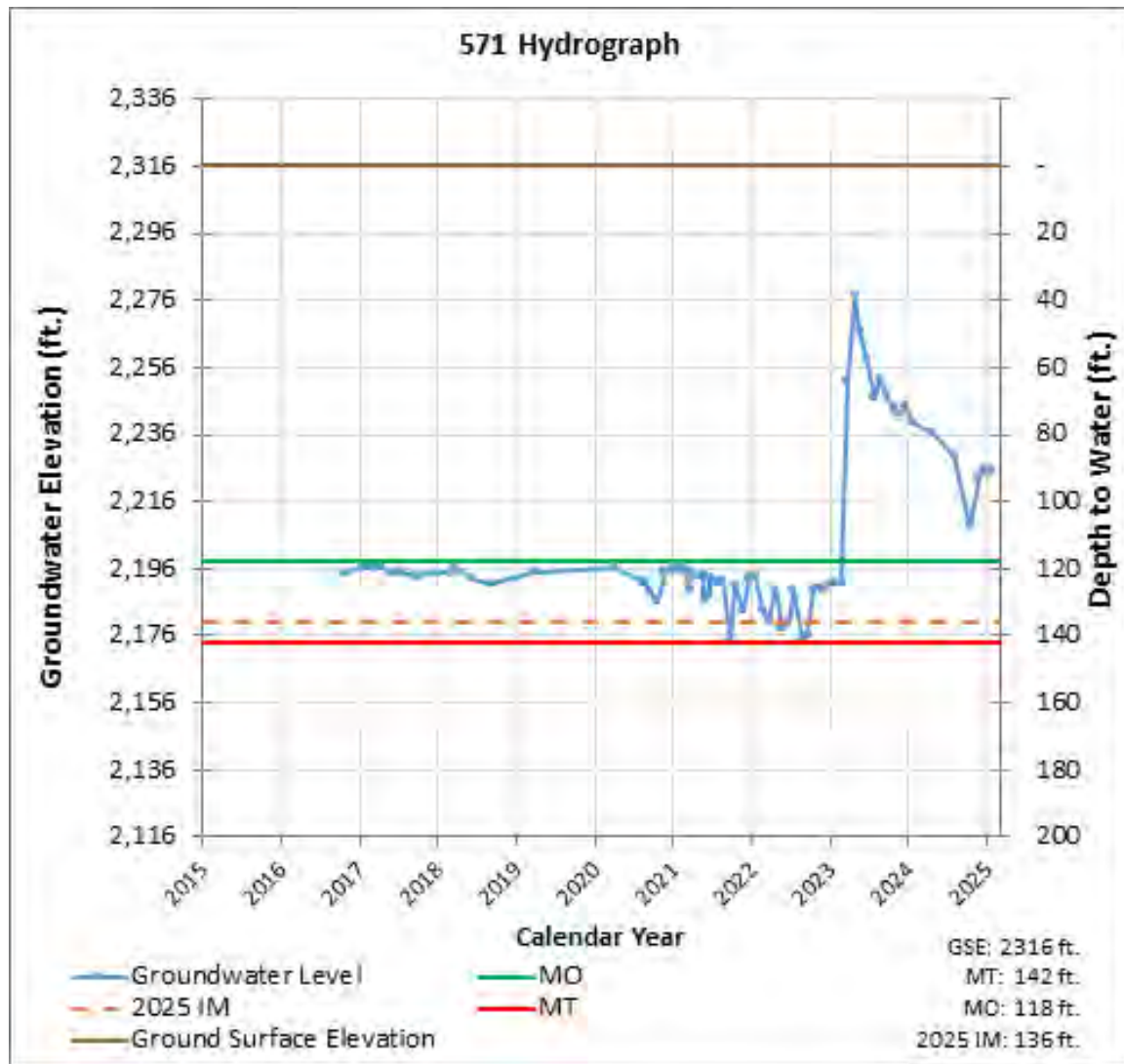
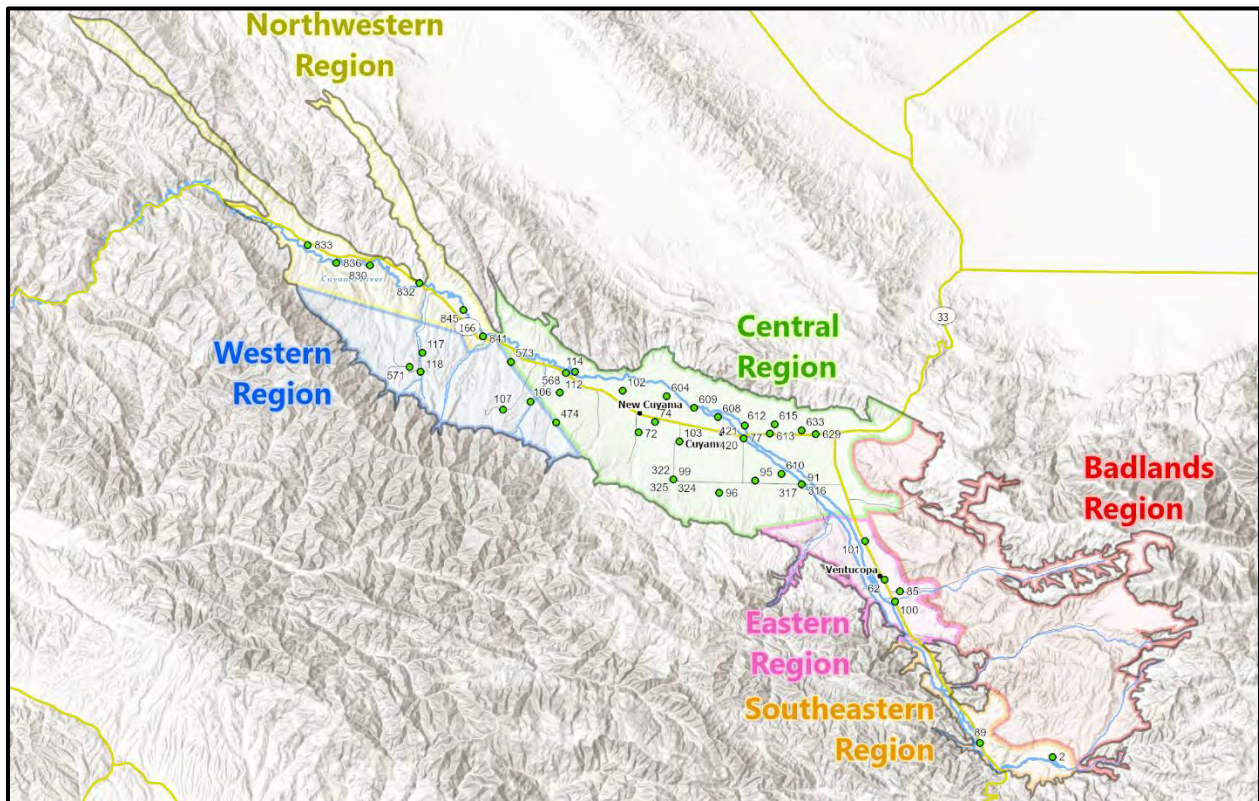


Figure 7: Northwestern Region – Well 841





**Figure 8: Threshold Regions in the Cuyama Groundwater Basin**

## 5. MONITORING NETWORK UPDATES

As shown in Table 2, there are four wells with no measurement during the current monitoring period. These “no measurement codes” can have different causes as described below.

- Landowner changed and an access agreements have not been established with the current landowner:
  - Wells 830
- Data not yet available due to transducer malfunction:
  - Wells 62
- Wellsite was locked at the time that the monitoring team arrived to take a measurement:
  - Wells 613 and 633

Additionally, well 608 is now confirmed to be “destroyed” and is no longer available for monitoring. The landowner and monitoring staff have identified a well within 100 ft that is suitable to continue monitoring in this location; the data from that new well is still reported for well 608 in this version of the report. The groundwater level monitoring network will be modified to remove well 608 and add in this new well. The new well is in the process of being incorporated into Opti. The new well will use historical data from Well 608 as a proxy for future analysis conducted for GSP implementation.





February 28, 2025

Cory Bantilan, Chair  
Cuyama Basin Groundwater Sustainability Agency  
Cuyama Valley Family Resource Center 4689 CA-166  
New Cuyama, California 93254

*Sent via email to: TBlakslee@hgcpm.com*

**RE: General Items for Consideration**

Dear Chair Bantilan:

The UC Davis School of Law Small Farmer Water Justice Clinic (“Clinic”) submits this letter to the Cuyama Basin Groundwater Sustainability Agency (“CBGSA”) for your consideration.

The Clinic was founded in July 2024 to assist small farmers with their legal issues relating to their water use and water rights, especially those issues involving the Sustainable Groundwater Management Act (SGMA). As part of that mission, the Clinic would like to make sure CBGSA is aware of (1) the need to upload documents related to the adjudication onto the CBGSA website and (2) the need to comply with a disclosure of economic interests.

**(1) Adjudication Documents Posted to the CBGSA Website**

Existing law requires that “all case management orders, judgments, and interlocutory orders” in certain adjudication actions be posted on a specified groundwater sustainability agency website “in the interest of transparency and accessibility.”<sup>1</sup>

For CBGSA, this means that all case management orders, judgments, and interlocutory orders in the matter of *Bolthouse Land Company, LLC, et al. vs All Persons Claiming a Right to Extract Or Store Groundwater in the Cuyama Valley Groundwater Basin (No. 3-013), et al.* (Case No. BCV-21-101927) should be available to the public on the CBGSA website.

Existing law specifies that the court should have appointed one party in the adjudication action to forward to CBGSA all case management orders, judgments, and interlocutory orders within 10 business days of issuance by the court. CBGSA is required to post those documents on its website within 20 business days of receipt from the appointed party.<sup>2</sup>

While it appears no party in the adjudication has been appointed by the court to forward documents to CBGSA, CBGSA is itself a party in the adjudication and should be receiving documents related to the adjudication when they are filed through CaseAnywhere.

The Clinic requests that CBGSA make efforts to post these documents to its website as quickly as possible after CBGSA receives them from the court. A commitment by CBGSA to timely upload court documents would remove a barrier to meaningful participation in the adjudication by small farmers, some of whom are unrepresented and not yet on the Case Anywhere service list. In posting adjudication information on its website, CBGSA has an opportunity not just to comply with state law, but to be an informational resource to

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<sup>1</sup> Cal. Code of Civ. Proc. § 831.5(a).

<sup>2</sup> *Id.*

small farmers in the Cuyama Basin seeking to preserve their livelihoods. This is consistent with findings and declarations by the Legislature regarding court fees and costs in a comprehensive adjudication.<sup>3</sup> Keeping the uploaded information current is especially important now that the adjudication is moving forward to “Phase 2” in the near future. We believe that CBGSA would incur only minimal costs to upload the documents.

As of the writing of this letter, CBGSA has maintained a webpage that contains a pulldown menu dedicated to “Adjudication Docs.”<sup>4</sup> However, the most recent document is a minute order dated March 11, 2024.<sup>5</sup> It is our understanding that the following case management orders, judgements, and interlocutory orders have been issued by the court since March 11, 2024:

Filed	Document
2/21/2025	Minute Order: Minute Order (Ruling on Submitted Matter)
1/29/2025	Minute Order: Minute Order (Further Status Conference Re: Expert Discovery and Notice Given)
1/23/2025	Minute Order: Minute Order (Trial Readiness Conference)
1/16/2025	Minute Order: Minute Order (Court Order Re: New Trial Readiness Conference set for January)
1/10/2025	Minute Order: Minute Order (Non-Appearance Case Review Re: Pro Hac Vice Renewal Fee for S...)
12/12/2024	Order : Phase 2 Discovery and Trial Order
12/3/2024	Minute Order: Minute Order (Further Status Conference)
10/31/2024	Minute Order: Minute Order (Hearing on Motion to Compel Discovery ; Hearing on Motion - O...)
10/24/2024	Minute Order: Minute Order (Court Order Re: Notice of Continuing October 28 hearing to Oc...)
9/12/2024	Minute Order: Minute Order (Further Status Conference Finalizing Safe Yield Jury Instruc...)
8/7/2024	Minute Order: Minute Order (Further Status Conference)
6/27/2024	Minute Order: Minute Order (Status Conference)
6/27/2024	Minute Order: Minute Order (Status Conference)
6/11/2024	Minute Order: Minute Order (Nunc Pro Tunc Order)
6/11/2024	Minute Order: Minute Order (Status Conference)
5/30/2024	Notice of Case Reassignment and Order for Plaintiff to Give Notice: Appointment Order
5/30/2024	Minute Order: Minute Order (Court Order Re: Appointment Order)
5/13/2024	Minute Order: Minute Order (Court Order Re: Notice of Taking Status Conference Off

<sup>3</sup> Cal. Code of Civ. Proc. § 831; See also Cal. Gov. Code § 68630.

<sup>4</sup> Cuyama Basin GSA “Resources” <https://cuyamabasin.org/resources#adjudication>

<sup>5</sup> *Id.* (24.03.11-Minute-Order-following-OSC-re-Surface-Rights-and-Case-Management-Conference).

	Calendar;)
5/2/2024	Minute Order: Minute Order (Non-Appearance Case Review Re: Submitting of [Proposed] Case ...)

The following case management orders, judgements, and interlocutory orders dated prior to March 11, 2024 are not available on the CBGSA website:

Filed	Document
1/9/2024	Minute Order: (Non-Appearance Case Review Re: Pro Hac Vice Renewal Fee for S...)
12/26/2023	Minute Order: (Non-Appearance Case Review Re: Filing of Objections and Brief...)
10/11/2023	Minute Order: (Status Conference Re: Status of Service;)
6/29/2023	Order : Amended Order Re Phase 1 Discovery and Trial Order
3/10/2023	Order : Compliance Order Re: Initial Disclosures and Phase 1 Trial Order
9/13/2022	Minute Order: (Non-Appearance Case Review Re: Objections to Jurisdictional B...)
7/7/2022	Order on Media Request to Permit Coverage
3/22/2022	Case Management Order: Joint Case Management Order on Initial Status Conference and Plaintiffs's Motion for Approval of Notice of Commencement and Form Answer
3/22/2022	Minute Order: (Court Order Re: Notice of Issuing Order Authorizing Electroni...)
3/10/2022	Minute Order: (Court Order Re: Notice of Vacating Non-Appearance Case Review...)
3/8/2022	Order : FINAL RULINGS/ORDERS
3/8/2022	Minute Order: (Initial Status Conference; Hearing on Motion - Other for Appr...)
1/14/2022	Minute Order: (Court Order Re: Notice of Setting Hearing for Motion for Appr...)
1/6/2022	Initial Status Conference Order
1/6/2022	Minute Order: (Court Order Setting Initial Status Conference)
8/31/2021	Order : Letter Re: Order Granting Ex Parte Application
8/31/2021	Order : Granting Ex Parte Application Referring Action to Judicial Counsel for Judicial Assignment
8/31/2021	Minute Order

## (2) Disclosure of Economic Interests

Existing law requires “members of the board of directors and the executive of a groundwater sustainability agency [to] file statements of economic interests in accordance with [the Political Reform Act of 1974] with the [Fair Political Practices Commission (“Commission”)] using the Commission’s online system for filing statements of economic interests.”<sup>6</sup>

The Clinic is informed that only three of the eighteen individuals identified by the Commission as required to file a statement of economic interests were issued an initial notice by the Commission. That initial notice was issued January 31, 2025. The annual deadline to file a statement of economic interest for all individuals is April 1st.<sup>7</sup> We urge CBGSA to confirm that all appropriate individuals have received notice to make a filing. The failure to file on time can result in a financial penalty.<sup>8</sup>

The Clinic believes an update during the next CBGSA regular meeting regarding compliance with filing statements of economic interests would be valuable to the public. This would be an opportunity for CBGSA to demonstrate its commitment to transparency.

The Clinic would also like to notify CBGSA that a newly introduced bill, AB 293, would require CBGSA to publish the location where the statements of economic interests filed by CBGSA individuals can be viewed.<sup>9</sup> While it is uncertain whether this bill will be enacted, the Clinic suggests that CBGSA be aware of the progress of this legislation and consider it when addressing compliance with existing law.

### Recommended Actions for CBGSA

The Clinic recommends that CBGSA consider the following actions:

1. Upload the court documents listed in this letter to the CBGSA website;
2. Adopt an internal policy for staff to upload all case management orders, judgments, and interlocutory orders related to the basin’s adjudication to the CBGSA website in a timely manner;
3. Provide an update to the public regarding compliance with existing law governing disclosure of economic interests at the CBGSA meeting on March 5th, 2025.

We appreciate your consideration of our recommendations. If you have any questions, please reach out to David Sandino at (530) 754-2067 or Christopher Mouawad at [cjmouawad-clinic@law.ucdavis.edu](mailto:cjmouawad-clinic@law.ucdavis.edu).

Sincerely,

David Sandino  
Director  
UC Davis  
Small Farmer Clinic

Madi Richards  
J.D. Candidate ‘25  
UC Davis  
Small Farmer Clinic

Thalia Taylor  
J.D. Candidate ‘25  
UC Davis  
Small Farmer Clinic

Christopher Mouawad  
J.D. Candidate ‘25  
UC Davis  
Small Farmer Clinic

CC: Grace Bianchi

<sup>6</sup> Cal. Gov. Code § 87200.5(a).

<sup>7</sup> Cal. Code Regs Tit. 2, § 18723(b)(3).

<sup>8</sup> Cal. Gov. Code § 91013.

<sup>9</sup> Assm. Bill 293 (Bennett), California Leg. 2025-2026 Reg. Session.

February 28, 2025

Cory Bantilan, Chair  
 Cuyama Basin Groundwater Sustainability Agency  
 Cuyama Valley Family Resource Center 4689 CA-166  
 New Cuyama, California 93254

*Sent via email to: TBlakslee@hgcpm.com*

**RE: The Variance Process and Recommendations for the Future**

Dear Chair Bantilan:

The UC Davis School of Law Small Farmer Water Justice Clinic (“Clinic”) submits this letter to the Cuyama Basin Groundwater Sustainability Agency (“CBGSA”) for your consideration.

The Clinic was founded in July 2024 to assist small farmers with their legal issues relating to their water use and water rights, especially those issues involving the Sustainable Groundwater Management Act (SGMA). As part of that mission, the Clinic assisted a small farmer with a variance request during the December interview and January hearing. It is our understanding that CBGSA intends to make improvements to the variance process this year. The Clinic supports that effort and believes that improvements to the variance process can be made that will better take into account the special circumstances relating to small farmers and that policies can be pursued by CBGSA to avoid the need for a variance. The Clinic would like to collaborate with CBGSA on this endeavor to improve the variance process for small farmers.

We believe the Clinic’s collaboration on the variance process will be helpful to CBGSA as a whole. Collaboration between the Clinic and CBGSA can be a cost-effective method for CBGSA to study and consider policy decisions for the benefit of small farmers in the Cuyama community. CBGSA has many competing priorities that divert limited time and resources away from studying how policy decisions could impact small farmers. The Clinic is prepared to step up to assist CBGSA and its staff by providing input and legal research services to support small farmers.

We request that CBGSA include the Clinic in policy and legal developments that can impact small farmers such as parameters for future variance processes, glide path discussions, and adopting protections for small farmers.

We hope to forge a collaborative relationship and provide resources to CBGSA to the best of our ability. If you have any questions, please reach out to David Sandino at (530) 754-2067 or Christopher Mouawad at [cjmouawad-clinic@law.ucdavis.edu](mailto:cjmouawad-clinic@law.ucdavis.edu).

Sincerely,

David Sandino  
 Director  
 UC Davis  
 Small Farmer Clinic

Madi Richards  
 J.D. Candidate ‘25  
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 Small Farmer Clinic

Thalia Taylor  
 J.D. Candidate ‘25  
 UC Davis  
 Small Farmer Clinic

Christopher Mouawad  
 J.D. Candidate ‘25  
 UC Davis  
 Small Farmer Clinic

CC: Grace Bianchi



To: Chair Cory Bantilan and CBGSA Directors  
From: Roberta Jaffe, CBSAC member  
Re: Intersection between the GSP and adjudication in the Cuyama Basin  
Date: March 3, 2025

I am writing as a follow up to a discussion on the intersection of the CBGSA and the Cuyama adjudication currently being heard in the Los Angeles Court that took place at the recent SAC meeting on February 27<sup>th</sup>. During the General Counsel Report a couple of SAC committee members asked legal representative Alex Dominguez several questions that I think the GSA needs to consider. I want to first say that I and many residents in the Cuyama Valley want to support a strong GSP that represents all landholders fairly. I bring these items to your attention in that context.

Mr. Dominguez shared with us that the goal of the GSA in the adjudication is to “protect the GSP.” I and many others in the community support that goal wholeheartedly. However, the following responses from Mr. Dominguez do not seem to be aligned with that goal:

- (1) When asked if the GSP policies, and specifically key highlights of the GSP including Management Areas related to allocations as well as the determination of Sustainable Yield have been submitted to the Court, his response was “I don’t know.” While I appreciate his straightforward response, in order to protect the GSP it seems imperative that the Court be made aware of the key elements of the GSP and all of the work that has been accomplished as soon as possible. I request that the GSA make a public statement as to whether the GSP has been submitted to the Court with highlights identified.
- (2) In addition, I want to make you aware that I have been asked by many Cuyama residents why the GSA withdrew from expert witness testimony on Phase 2, determining safe yield. I and another SAC committee member asked this of Mr. Dominguez. I realize that this and other decisions are made in closed session. However, I think it is important for you to be aware that there is concern in the community that only the expert report of the plaintiffs will be heard by the Court and in reviewing the details of this report, there are many concerns that we think need to be raised. Will the GSA consider presenting these concerns?
- (3) A law was passed by the state legislature in 2023 that requires any GSA basins that are also involved in an adjudication to post on their website any court filed documents. The GSA website does have a location for this, but no documents have been posted there in almost one year, and there are documents missing from previous years. This is a very important resource for the community since many of us have no access to the court-filed documents which impact all of us. When asked about this, Mr. Dominguez responded that since the Cuyama Basin was already under adjudication when the law passed, the GSA is not required to do this. This might be true in the implementation of the statute, but in the spirit of the law to keep the public informed, I request that the GSA continue updating the website with all relevant documents filed with the Court related to the adjudication.

Many of us in the community want to make sure the Court is fully aware of the GSP and the many steps that have been taken over the past 10 years to bring the Basin into sustainability. We hope the GSA will put more effort into “protecting the GSP” before the Court.

Thank you for your consideration.