



CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY STANDING ADVISORY COMMITTEE MEETING

Committee Members

Brenton Kelly (Chair)	Jean Gaillard	John Caufield	Roberta Jaffe
Joe Haslett (Vice Chair)	Brad DeBranch	David Lewis	

AGENDA

October 30, 2025

Agenda for a meeting of the Cuyama Basin Groundwater Sustainability Agency Standing Advisory Committee meeting to be held on Thursday, October 30, 2025, at 5:00 PM at the **Cuyama Valley Family Resource Center 4689 CA-166, New Cuyama, CA 93254**. Participate via computer at: <https://msteams.link/SMRO> or by going to Microsoft Teams, downloading the free application, then entering Meeting ID: 271 931 749 29 Passcode: ep9zi3jm, or telephonically at (469) 480-3918, Phone Conference ID: 443 911 300#.

The order in which agenda items are discussed may be changed to accommodate scheduling or other needs of the 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 Committee discussion of all items in which they are interested.

Teleconference Locations:

4689 CA-166 New Cuyama, CA 93254	11601 Bolthouse Drive, Ste 200 Bakersfield, CA 93311	144 De La Costa Avenue Santa Cruz, CA 95060	112 W Cielo Ave Ridgecrest, CA 93555
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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 Wednesday 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 (Kelly) (1 min)
2. Roll Call (Kelly) (1 min)
3. Pledge of Allegiance (Kelly) (2 min)
4. Meeting Protocols (Bianchi) (2 min)
5. Public Comment for Items Not on the Agenda | *At this time, the public may address the Committee on any item not appearing on the agenda that is within the subject matter jurisdiction of the Committee.*

ACTION ITEMS

6. Approval of September 28, 2025, Minutes (Kelly) (3 min)
7. Approve the 2026 Meeting Calendar (Bianchi) (1 min)
8. Groundwater Sustainability Plan Implementation
 - a) Discuss and Take Appropriate Action on the Plan and Timeline to Evaluate Allocations in the Ventucopa Management Area (Blakslee/Van Lienden/Ceyhan) (90 min)
 - b) Discuss and Take Appropriate Action on Tri-County Pistachio Variance Request (Blakslee/Dominguez) (20 min)

- c) Discuss and Take Appropriate Action on the CMA Allocation Exchanges Policy (i.e. Water Market) (Blakslee) (30 min)
- d) Discuss and Take Appropriate Action on Options to Address Adaptive Management Processes (Blakslee) (10 min)
- e) Discuss and Take Appropriate Action on Options to Address New Pumping Outside the Management Area (Blakslee/Dominguez) (30 min)

REPORT ITEMS

- 9. Technical Updates
 - a) Update on Groundwater Sustainability Plan Activities (Van Lienden) (5 min)
 - b) Update on Grant-Funded Projects (Van Lienden) (5 min)
- 10. Administrative Updates
 - a) Report of the Executive Director (Blakslee) (5 min) – *Verbal*
 - b) Report of the General Counsel (Dominguez) (1 min) – *Verbal*
 - c) Board of Directors Agenda Review (Blakslee) (3 min)
- 11. Items for Upcoming Sessions (1 min)
- 12. Committee Forum (1 min)
- 13. Correspondence (1 min)
- 14. Adjourn (8:04 p.m.)

Cuyama Basin Groundwater Sustainability Agency Standing Advisory Committee Meeting

August 28, 2025

Draft Meetings Minutes

PRESENT:

Kelly, Brenton – Chair
Haslett, Joe – Vice Chair
Caufield, John
Jaffe, Roberta
DeBranch, Brad
Gaillard, Jean
Lewis, Dave

Bianchi, Grace – Project Coordinator
Blakslee, Taylor – Assistant Executive Director
Dominguez, Alex – Legal Counsel
Van Lienden, Brian – Woodard & Curran
Ceyhan, Sercan – Woodard & Curran

1. Call to Order

Cuyama Basin Groundwater Sustainability Agency (CBGSA) Standing Advisory Committee (SAC)
Chair Kelly called the meeting to order at 5:00 p.m.

2. Roll Call

Ms. Bianchi called roll of the Committee (shown above).

3. Pledge of Allegiance

Chair Kelly led the pledge of allegiance.

4. Meeting Protocol

Project Coordinator Grace Bianchi provided an overview of the meeting protocols in facilitating a hybrid meeting.

5. Public Comment for Items Not on the Agenda

Chair Kelly opened up public comment. No comments were made.

Action Items

6. Approval of June 26, 2025, Minutes

Committee Chair Kelly opened the floor for comments on the June 26, 2025, CBGSA SAC meeting minutes.

There were no comments on this item.

MOTION

Committee Member Jaffe made a motion to approve June 26, 2025, CBGSA SAC meeting minutes. The motion was seconded by Committee Member Gaillard. A roll call vote was made, and the motion passed.

AYES: Caufield, DeBranch, Gaillard, Haslett, Jaffe Kelly, Lewis

NOES: None

ABSTAIN: None

ABSENT: None

7. Groundwater Sustainability Plan Implementation**a. Discuss and Take Appropriate Action on the Plan and Timeline to Evaluate Allocations in the Ventucopa Management Area**

Mr. Blakslee provided background on the expanding allocations in the Ventucopa Management Area.

Mr. Van Lienden introduced the overall objective to assess data availability and adequacy.

Sercan Ceyhan from Woodard & Curran expanded on the proposed process to assess the adequacy of the model to help make decisions regarding potential allocations in the Ventucopa Management Area.

Mr. Blakslee highlighted the reasoning behind the changes to the draft timeline for assessing the implementation of allocations.

Committee Member Jaffe asked about the impact of pushing approval on approach for annual report. Mr. Blakslee responded that there is not an impact to the fiscal year budget.

Committee Member Caufield asked if a determination has already been made regarding the fault influencing the flow of groundwater into the Ventucopa area and if the CBGSA revisiting this study. Mr. Van Lienden mentioned the Santa Barbara Canyon Fault (SBCF) Investigation report is on website.

Mr. Blakslee mentioned that he can distribute the report.

Committee Member Haslett asked when the CBGSA can expect to make a decision on allocations. Mr. Blakslee responded that the staff report to the board in January will include a recommendation if the data is adequate to inform a decision to allocate.

Mr. Ceyhan continued to outline the process to assess the adequacy of the data and model, and his slides were included in the SAC packet. He invited folks to ask about hydrology and potential allocations in a specific geographic area.

Committee Member Jaffe asked about the groundwater levels of wells on either side of the SBCF. Mr. Ceyhan confirmed that they believe the 700 ft drop in head across 1 mile (from 2600 to 1900) is indicative of being on two sides of the fault.

Chair Kelly recommended adding depth to water graph to slide 27 (GWLs around the SBCF).

Committee Haslet commented that there is a county-maintained gauge with historical data on his property in Cottonwood Canyon. He recommended get the data from the county. Mr. Ceyhan

Chair Kelly asked when the CIMIS station at the high school was decommissioned. He expressed concern regarding the accuracy of the data as it was believed to be decommissioned for over a decade.

Mr. Ceyhan responded that the data can be corrected if needed once the new CIMIS stations are installed.

Committee Member Haslett asked about the permanently fallowed land shown in the land use map data. Mr. Ceyhan responded that the model assumes the fallow lands use a small amount of water used for dust management and it assumes that permanently fallowed lands have no use.

Committee Member DeBranch asked about the land use data provided by landowners. Mr. Blakslee responded that the GSA sends out land use forms, which have been used to request land use data.

Mr. Blakslee added that he will work with Woodard and Curran to ensure that all land use data from landowners is used in the model. Mr. Van Lienden added that the permanently fallowed land use classification was determined by W&C from their own observations.

Chair Kelly noted that SB Highlands have removed a significant portion of the vineyards shown in the land use map near Ventucopa. Staff reported that they will look into this and ensure the most up to date information is applied to the model.

Chair Kelly asked Mr. Ceyhan to define the rating tables. Mr. Ceyhan responded that ratings table are used to convert the flow width to the flow height in the channel to define how much water is moving into the basin from the stream.

Committee Member Caufield asked about the outlier show on the pumping slide. Mr. Ceyhan responded that it may have been influenced by a miscalculation of the crop acreage.

Chair Kelly asked if extraction in the Central Management Area is shown in layer 3. Mr. Ceyhan responded that better understanding the thickness and formation of layer 3 is important to estimate subsurface flows and makes it challenging to provide calibrations in the model.

Committee Member Haslett asked about the information collected from the bore holes. Mr. Ceyhan responded the bore holes collect information on geologic formation type, the porous media, and the groundwater level.

Stakeholder Jim Wegis commented that there is a well near his property that is 700 feet and dry. He noted he has the e-log for a well, but it has been capped. Mr. Ceyhan requested the well information from Mr. Wegis.

Chair Kelly asked about using the LiDAR data. Mr. Ceyhan responded that the rating table data was not sufficient to complement the LiDAR data.

Committee Member Haslett asked about the definition of deep percolation relative to the area and soil conditions. He asked if the subsurface flows map includes data from the stream gauge south of Ozena Fault. Mr. Ceyhan responded that it is included.

Chair Kelly suggested adding a gauge be added to the bridge near Apache Canyon.

Committee Member Caufield asked about the exploratory oil wells.

Committee Chair Kelly asked about there is any rain gauge/ satellite data available or if data just through PRISM data. Mr. Ceyhan responded that CIMIS Station data is available.

Mr. Van Lienden provided a summary of the geophysical analysis in the 2024 SBCF investigation and outlined the objectives and timeline for the 2025 investigation.

Committee Member DeBranch asked about the possibility of the fault ending between the two transect lines that were run in BLM land and along highway 33. Mr. Van Lienden responded that Jim Steinberg may have a more thorough answer, but that it is possible the fault ends before the highway 33 transect.

Stakeholder Tristan Zannon commented that satellite imagery may indicate a potential fault south of map shown on the Summary of Geophysical Analysis in 2024 Investigation slide.

b. Discuss and Take Appropriate Action on the CMA Allocation Exchanges Policy

Mr. Blakslee provided an overview of the Central Management Area (CMA) Allocation Exchanges Policy that was included in the packet for approval.

Legal Counsel Alex Dominguez reviewed the sections in the policy.

Chair Kelly asked if someone over pumped, but paid their fees, would they be able to exchange allocations. Legal Counsel Alex Dominguez responded that a landowner that has paid fees would be considered in good standing with the GSA and would be able to exchange.

Mr. Blakslee noted that Hallmark Group will track allocations through reports and that a glidepath or water market strategy would not negatively impact the GSA's ability to meet sustainability by 2040.

Committee Member Haslett asked about the timeframe in which exceedances are identified and addressed. Mr. Blakslee responded that staff is recommending a process and timeframe in the Adaptive Management Standard Operating Procedures (SOP).

Committee Member Jaffe expressed concern about the lack of detail in the policy and noted the Fox Canyon water markets, where large pumpers aggregated and had to end their water market program .

Committee Member Haslett expressed concern regarding the time period to address and correct the wells below the minimum threshold (MT).

Legal Counsel Alex Dominguez commented that the Cuyama Basin is a smaller pool and the policy addresses the conditions specific to this basin and the CMA.

Committee Member Gaillard asked if there is a selection process in which the exchanges are allowed so that small farmers have a priority in the market.

Committee Member Caufield asked if Minimum Thresholds (MTs) will remain fixed. Mr. Blakslee responded that there was an adjustment to an MT at the last meeting, and that most MTs have been set based on methodology outlined in the GSP and should not change.

Committee Member Jaffe expressed that there needs to be more discussion about the policy, including more input from small farmers like Dave Lewis, and that the policy isn't ready to adopt it. Mr. Blakslee responded that there was key input from stakeholders in the last public meetings and those comments were considered in the development of the policy. Mr. Dominguez stated that the SAC and Board provided input on what they wanted in the policy, and those comments were incorporated.

Committee Member Haslett expressed concern that the Board and other committee conversations are not representative of small farmer considerations, who are in learning mode when they attend the meetings. He recommended a public process for interested parties to register for the water markets and allocate a percentage of the total allocations for small farmers.

Committee Member Jaffe recommended that the policy consider more stakeholder input and could be an opportunity to build trust, transparency and equity in the Basin.

Stakeholder Jim Wegis commented that the pool idea only works for landowners that have extra water that they can make available.

Stakeholder Tristan Zannon preferred a simpler policy that is subject to revisions. He added that he hasn't found any sellers.

Committee Member DeBranch commented that a simpler policy would be better, and the price would be somewhat driven off the penalty fee that the GSA set forth.

Committee Member Lewis noted that he didn't receive a notice before planting additional trees and the ad hoc didn't reach out to him regarding this issue.

Committee Chair Kelly commented that there is an issue with the spatial distribution of benefit or water to be sold.

Committee Member Haslett commented that the new model is the cause of landowners impacted by allocations were included in the CMA that used the new model is the cause of the these issues.

MOTION

Committee Member Jaffe made a motion to recommend the board not adopt the policy until there are further refinement and engagement of stakeholders impacted. The motion was seconded by Committee Member Haslett. A roll call vote was made, and the motion passed.

AYES:	Caufield, Jaffe, DeBranch, Gaillard, Haslett, Kelly, Lewis
NOES:	None
ABSTAIN:	None
ABSENT:	None

c. Discuss and Take Appropriate Action on Standard Operating Procedures for Adaptive Management Process

Mr. Blakslee provided an overview of the Standard Operating Procedures (SOP) and its application to the Minimum Threshold (MT) exceedance on Opti Well #610.

Committee Chair Kelly asked who would help realize potential improvements or deepening of wells as a potential management strategy. Would it be the GSA's responsibility? Mr. Blakslee stated that this is just one potential option, and that the GSA could work with local landowners and that a potential management strategy could be a pumping restriction.

Member Jaffe mentioned concern that the SOP does not specify a timeline or timeframe by which exceedances would be investigated or by which management actions would be implemented. Mr. Blakslee stated that he can include a monthly timeline for the steps in the procedure, which can be reviewed by the Board.

Committee Chair Kelly asked who makes the first determination if the well is in exceedance or if adaptive management process is triggered. Mr. Blakslee responded that staff would present that information to the Board and would seek recommendations to continue with an investigation.

MOTION

Committee Member Caufield made a motion to recommend the board adopt the SOP with the inclusion of a monthly timeline. The motion was seconded by Committee Member Haslett. A roll call vote was made, and the motion passed.

AYES:	Caufield, Jaffe, DeBranch, Gaillard, Haslett, Kelly
NOES:	None
ABSTAIN:	None
ABSENT:	Lewis

d. Discuss and Take Appropriate Action on Options to Address New Pumping Outside the Management Area

Legal Counsel Dominguez provided an overview of the options to address new pumping outside the management area (MA), which the Board requested during the meeting on July 9, 2025. He presented a few examples of how other GSAs handle new pumping outside the management area, which are included in the SAC packet.

Committee Chair Kelly asked about the basin-wide allocations in the East Kaweah GSA and Eastern Tule GSA. Mr. Dominguez responded that allocations are given for each parcel.

Committee Member Jaffe asked how these options are impacted by the adjudication and why go through the allocation process if the courts decide.

Legal Counsel Dominguez responded that the GSA have to fulfill court orders and fulfill SGMA requirements. He noted that it is unclear when the courts will determine allocations which is why the GSA has moved forward setting allocations.

Committee Member Haslett supports option 1, Continue implementing the GSP.

Committee Member DeBranch commented that the data he has seen suggest that the basin is being pumped well beyond the sustainable yield.

8. Technical Updates

a. Update on Groundwater Sustainability Plan Activities

Mr. Van Lienden noted that the update on GSP activities is provided in the SAC packet.

b. Update on Grant-Funded Projects

Mr. Van Lienden noted that the update on the grant-funded projects is provided in the SAC packet.

c. Update on July 2025 Groundwater Conditions Report

Mr. Blakslee provided a brief overview of the July 2025 groundwater conditions, which is provided in the packet.

Committee Member Jaffe commented that the transducer in Well 571 is broken.

9. Administrative Updates

a. Report of the Executive Director

Nothing to report.

b. Report of the General Counsel

Nothing to report.

c. Board of Directors Agenda Review

Mr. Blakslee noted the September 3, 2025, CBGSA Board Meeting agenda is provided in the SAC packet.

10. Items for Upcoming Sessions

Nothing to report.

11. Committee Forum

Nothing to report.

12. Correspondence

Stakeholder Tristan Zannon spoke about his correspondence included in the board packet. He noted that he wasn't given the opportunity to address the allocations. Benjamin Markham, Zannon's Legal Counsel, added that there are errors on the GSA's side and they will take this to the board on September 3, 2025.

13. Adjourn

Chair Kelly adjourned the meeting at 9:42 p.m.

STANDING ADVISORY COMMITTEE OF THE
CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

Chair Kelly: _____

ATTEST:

Vice Chair Haslett: _____



TO: Standing Advisory Committee
Agenda Item No. 7

FROM: Taylor Blakslee, Hallmark Group

DATE: October 30, 2025

SUBJECT: Approval of 2026 Meeting Schedule

Recommended Motion

Approve the 2026 Groundwater Sustainability Agency Board of Directors and Standing Advisory Committee meetings schedule.

Discussion

The proposed Cuyama Basin Groundwater Sustainability Agency (CBGSA) Board of Directors and Standing Advisory Committee (SAC) meeting calendar for 2025 is provided as **Attachment 1** for consideration of approval.

Staff are looking for feedback on the July Board meeting date, which is currently proposed for July 1st.

Cuyama Basin Groundwater Sustainability Agency 2026 Meeting Calendar

BOD
 SAC
 Holiday

January						
S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
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29	30					

December						
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TO: Standing Advisory Committee
Agenda Item No. 8a

FROM: Taylor Blakslee

DATE: October 30, 2025

SUBJECT: Discuss and Take Appropriate Action on the Plan and Timeline to Evaluate Allocations in the Ventucopa Management Area

Recommended Motion

SAC and Board feedback requested.

Discussion

On July 9, 2025, the Board approved staff's proposed plan outlining the technical tasks, coordination steps, and a draft schedule for evaluating if the current data and model is adequate to assess if allocations are required in the Ventucopa Management Area.

A technical approach to review the existing data and impact on the model was developed and reviewed with the basin Tech Forum on August 13, 2025 and the Ventucopa Ad hoc (Directors Albano, Bantilan, Reely, and Yurosek) on August 19, 2025.

At the September 3, 2025, Board meeting, staff reported that an assessment of allocations in the Ventucopa Management Area would not be ready for consideration until the January 2026 Board meeting (previously planned for November 2025) to allow incorporation of findings from the ongoing Santa Barbara Canyon Fault (SBCF) field investigation.

Since September, staff have continued refining the technical analysis and reviewed it with the Tech Forum on October 17, 2025, and the ad hoc on October 21, 2025. The findings from the data and model review, along with preliminary recommendations are summarized in **Attachment 1**. An update on the SBCF is provided as **Attachment 2**.

Cuyama Basin Groundwater Sustainability Agency

Ventucopa Area Data Gaps Analysis



Plan and Timeline to Evaluate Allocations in the Ventucopa Management Area

- **Overall Task Objective:** Develop a recommendation for whether the allocations should be expanded to the Ventucopa management area or if additional data and/or model recalibration is needed in the next fiscal year.

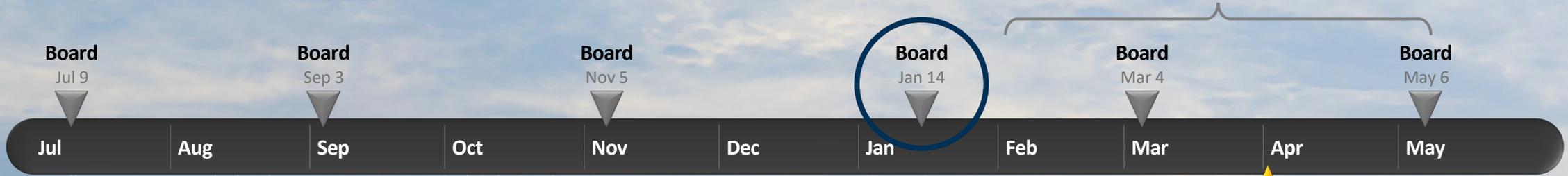
Proposed Process to Assess Available Data and Current Model

- Determine if current data and model are adequate to assess if allocations are needed:
 - **Assess data availability and adequacy:** develop a list of data needed and data available in the Ventucopa Management Area and identify data gaps and assess potential impact to model
 - **Assess model performance:** present and evaluate comparisons of modeled vs measured groundwater levels and modeled water budgets for the 1998-2024 water years
- Consider options for evaluation of potential allocations:
 - Use current data and model to evaluate potential allocations
 - Perform a model re-calibration with currently available data (including current SBCF study)
 - Develop additional data or perform additional analysis before performing a model re-calibration availability of data to perform model re-calibration

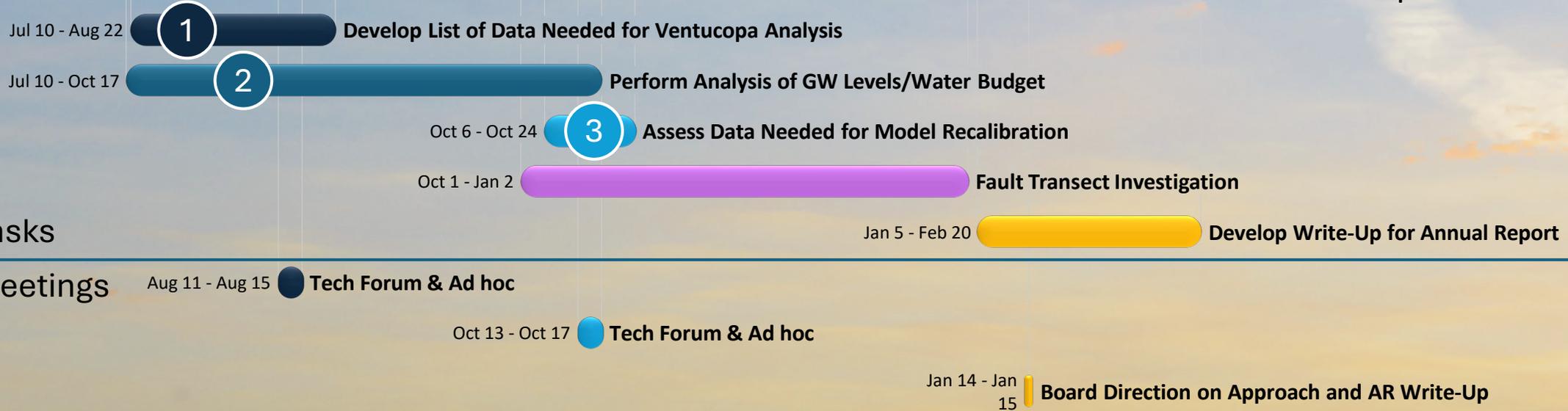
Ventucopa Management Area

Revised: Draft Plan/Timeline for Assessing the Implementation of Allocations

Fiscal Year 2026-2027 Development



★
Apr 1
Annual Report Due



Allocations aim to balance inflows and outflows

Change in Storage = Inflows - Outflows

- Cannot measure the storage volume directly but we use GWLs as indicators.
- Deep Percolation (Surface Recharge)
- Stream Seepage
- Subsurface Inflow
- Pumping
- Stream Loss
- Subsurface Outflow

CBWRM is a tool that calculates this balance spatially and temporally.

Are the existing datasets adequate to estimate and validate these components?

Recap – Datasets reviewed last time

- Groundwater Levels
 - Declining trend after 1998, stable after 2015
 - Recoveries in the historical wet years, recovery after 2023 winter
- Deep Percolation / Applied Water
 - Precipitation, ET, Land Use, Pumping
- Streams
 - Potential improvements in stream representation in CBWRM
- Subsurface Flows
 - Uncertainty in SBC Fault, CBWRM Stratigraphy
 - Flow from foothills and Badlands

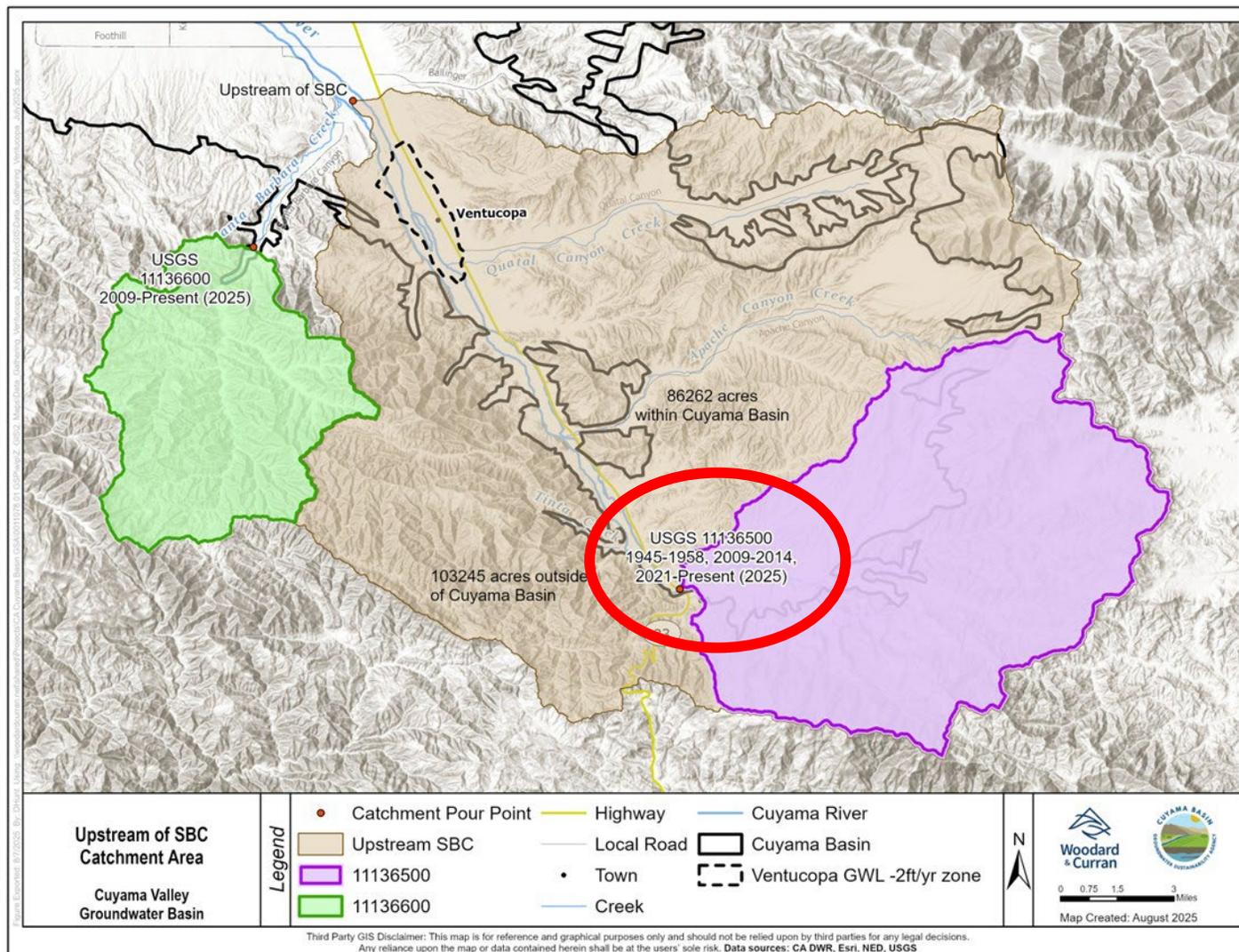
Agenda

1. Streamflow at USGS 11136500
2. Groundwater levels
3. Pumping
4. Simulated water budget for the vicinity of Ventucopa Management Area
 - Root Zone Budget
 - Groundwater Budget
 - Detailed Subsurface flows

MODEL RESULTS

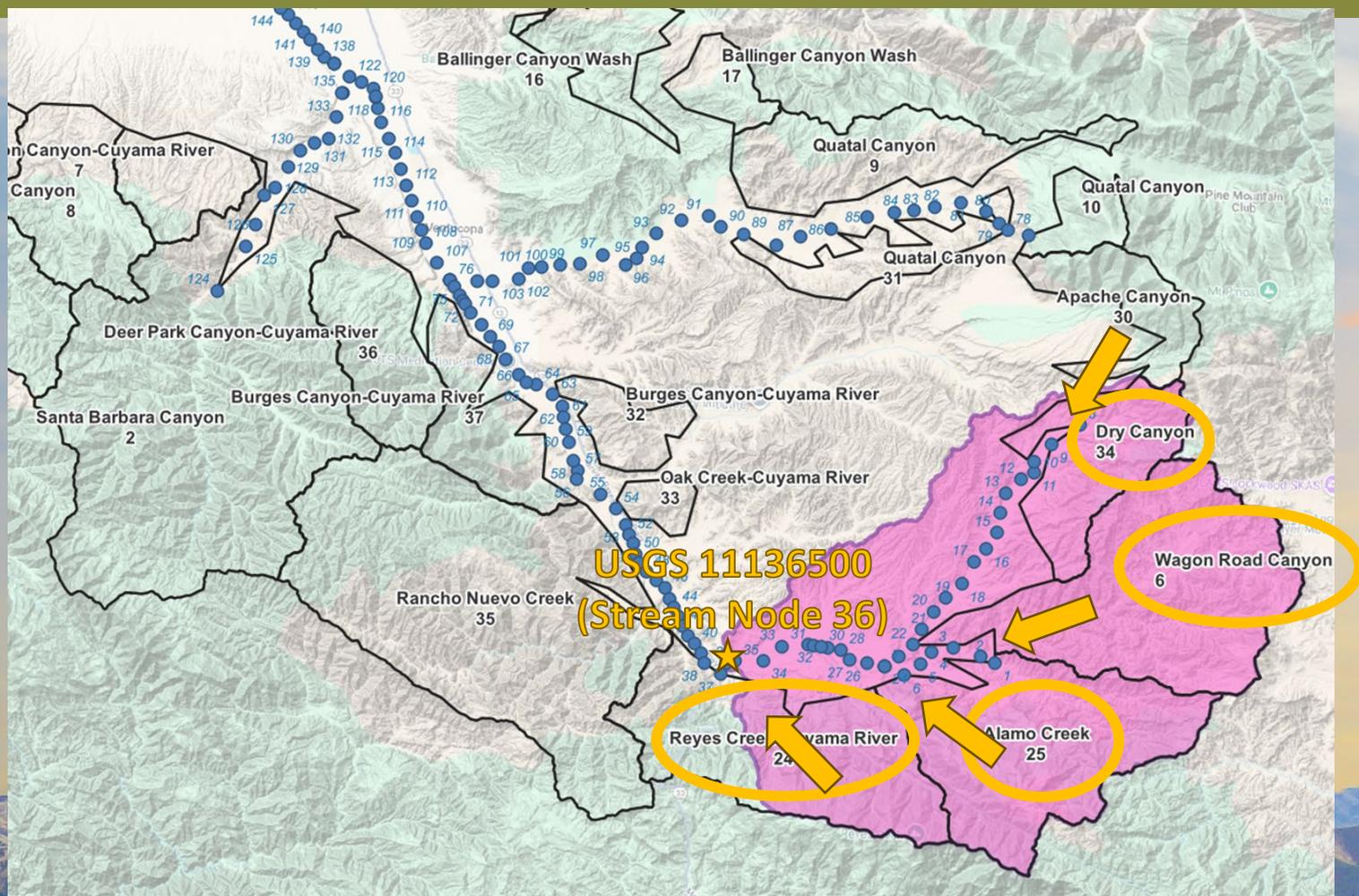
Streamflow at USGS 11136500

Streamflow Records near Ventucopa



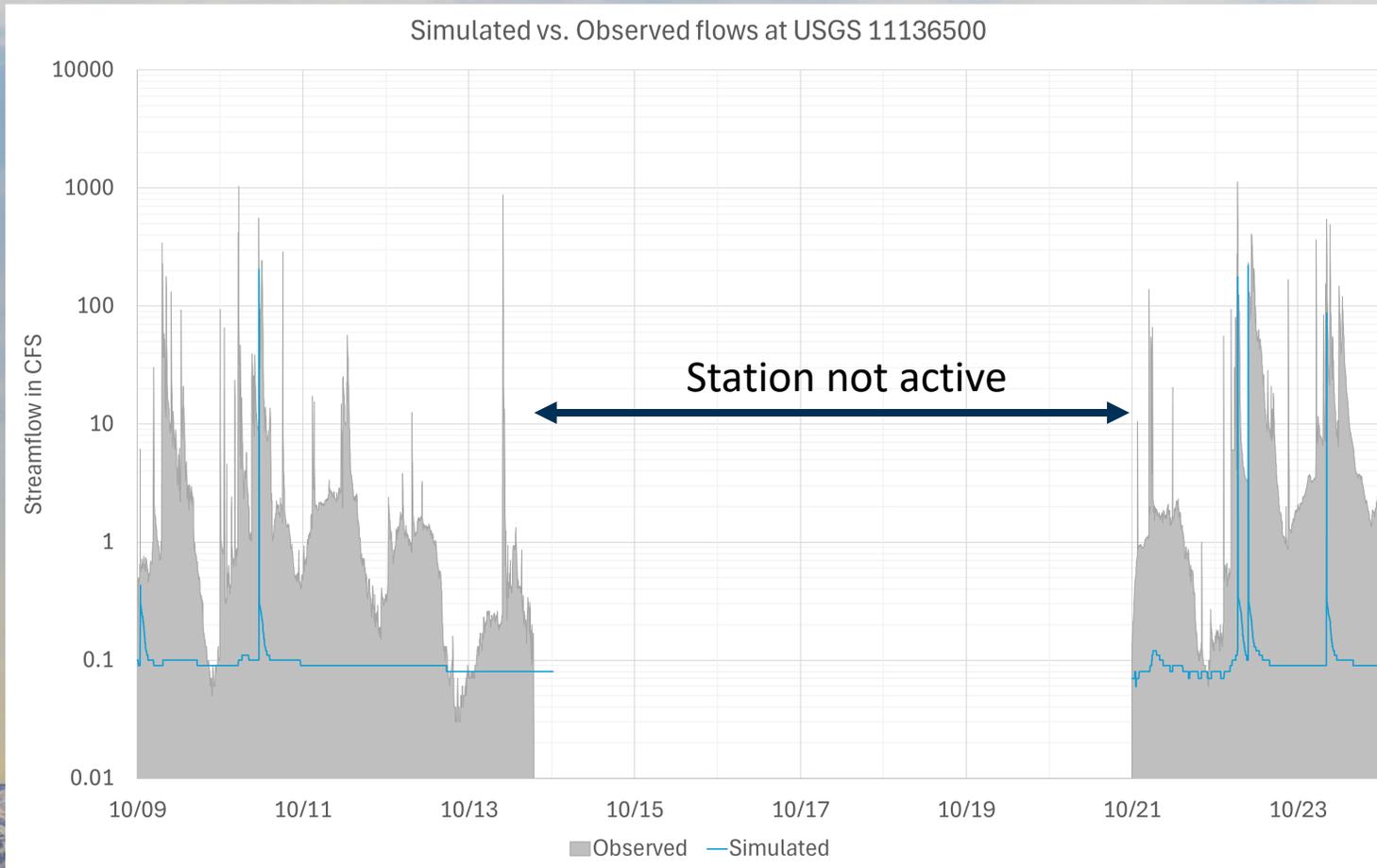
- Streamflow recorded at USGS 11136500 is not sufficient as model input due to data gaps.
- The data recorded 2009-2014 and 2021-present can be used for the validation of simulated streamflows.

USGS 11136500 vs Small Watersheds



- In CBWRM, streamflows from the foothills are simulated using the “Small Watersheds” module.
- Streamflows generated from the 4 highlighted small watersheds and the runoff generated inside the Cuyama basin flow through the USGS station.

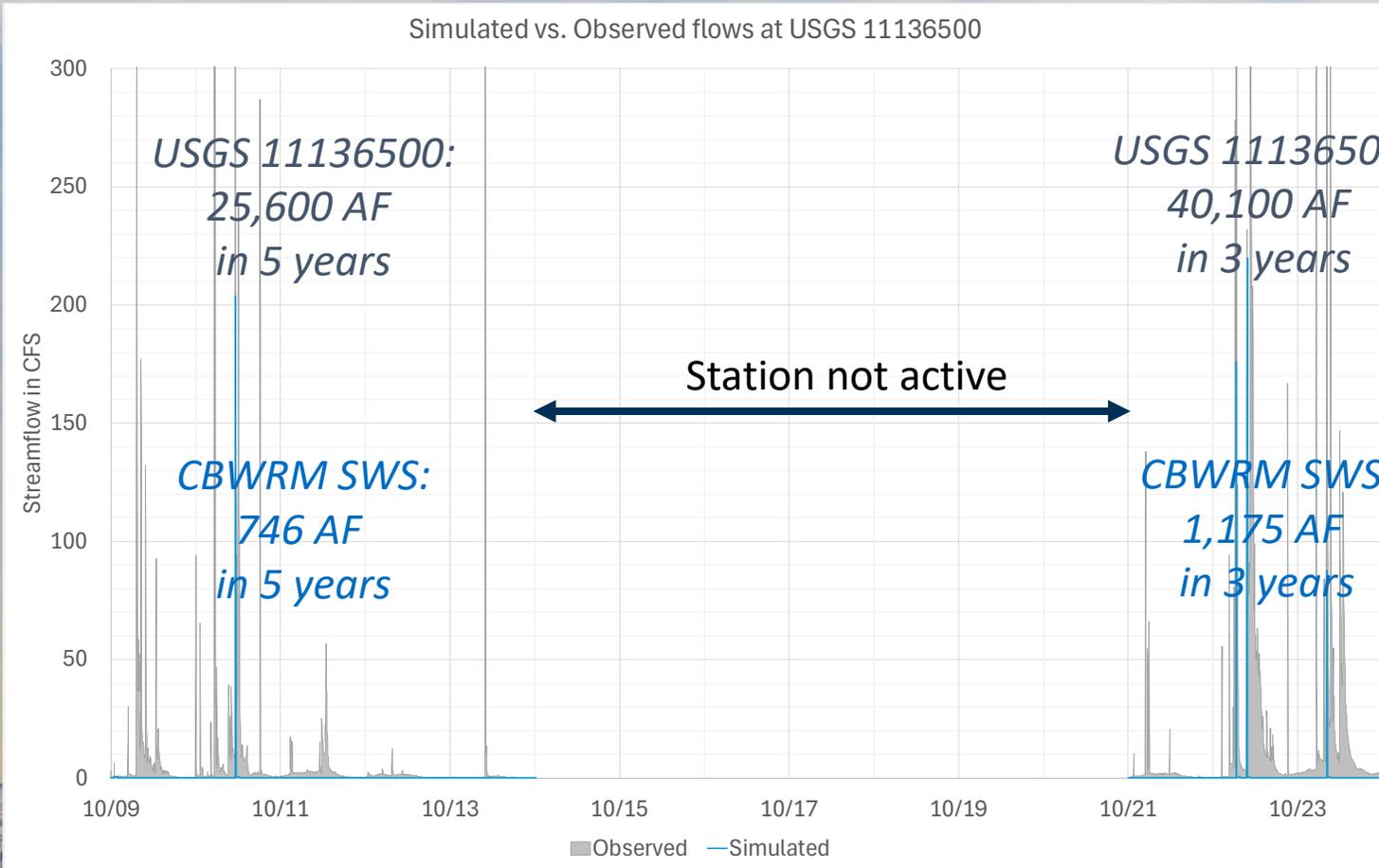
USGS 11136500 Simulated Streamflows



- Comparison shows discrepancy between simulated and observed streamflow rates and volume.
- CBWRM's Small Watersheds module cannot adequately simulate the streamflows.

USGS 11136500 Simulated Streamflows

Zoomed in to 0-300 CFS



- Comparison shows discrepancy between simulated and observed streamflow rates and volume.
- CBWRM's Small Watersheds (SWS) module cannot adequately simulate the streamflows.

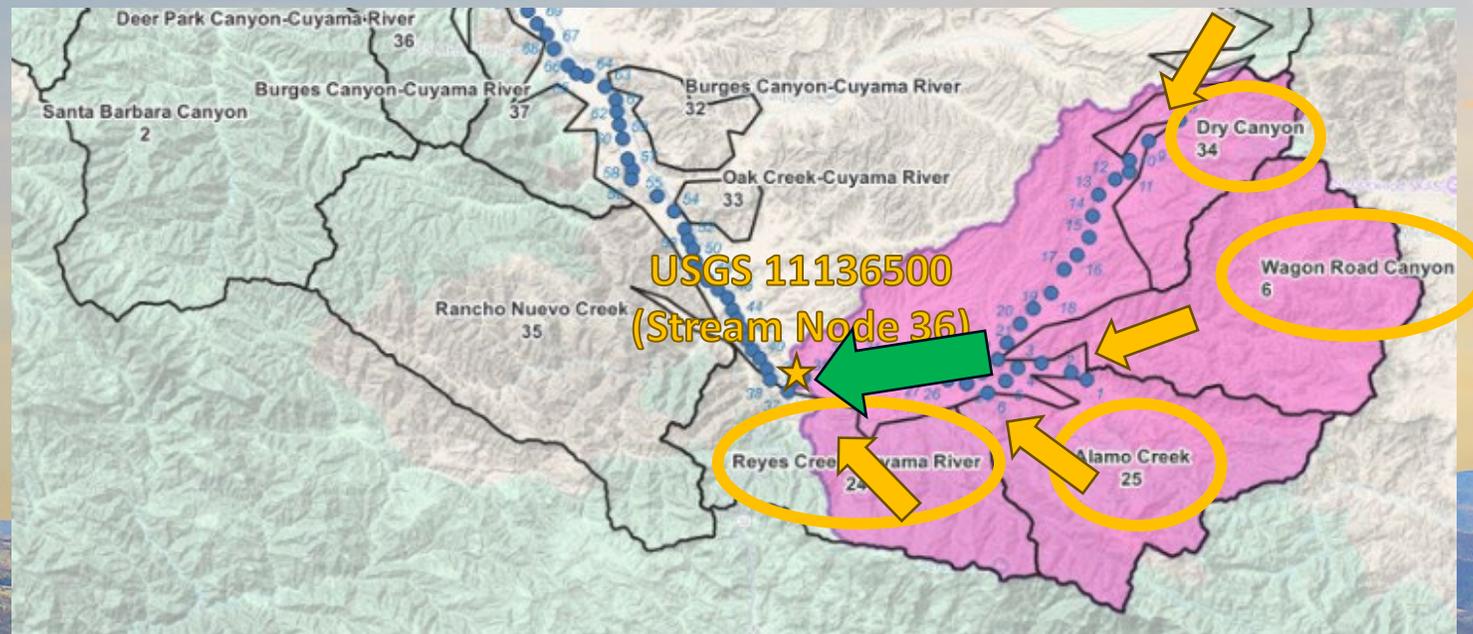
MODEL RESULTS

Groundwater Levels

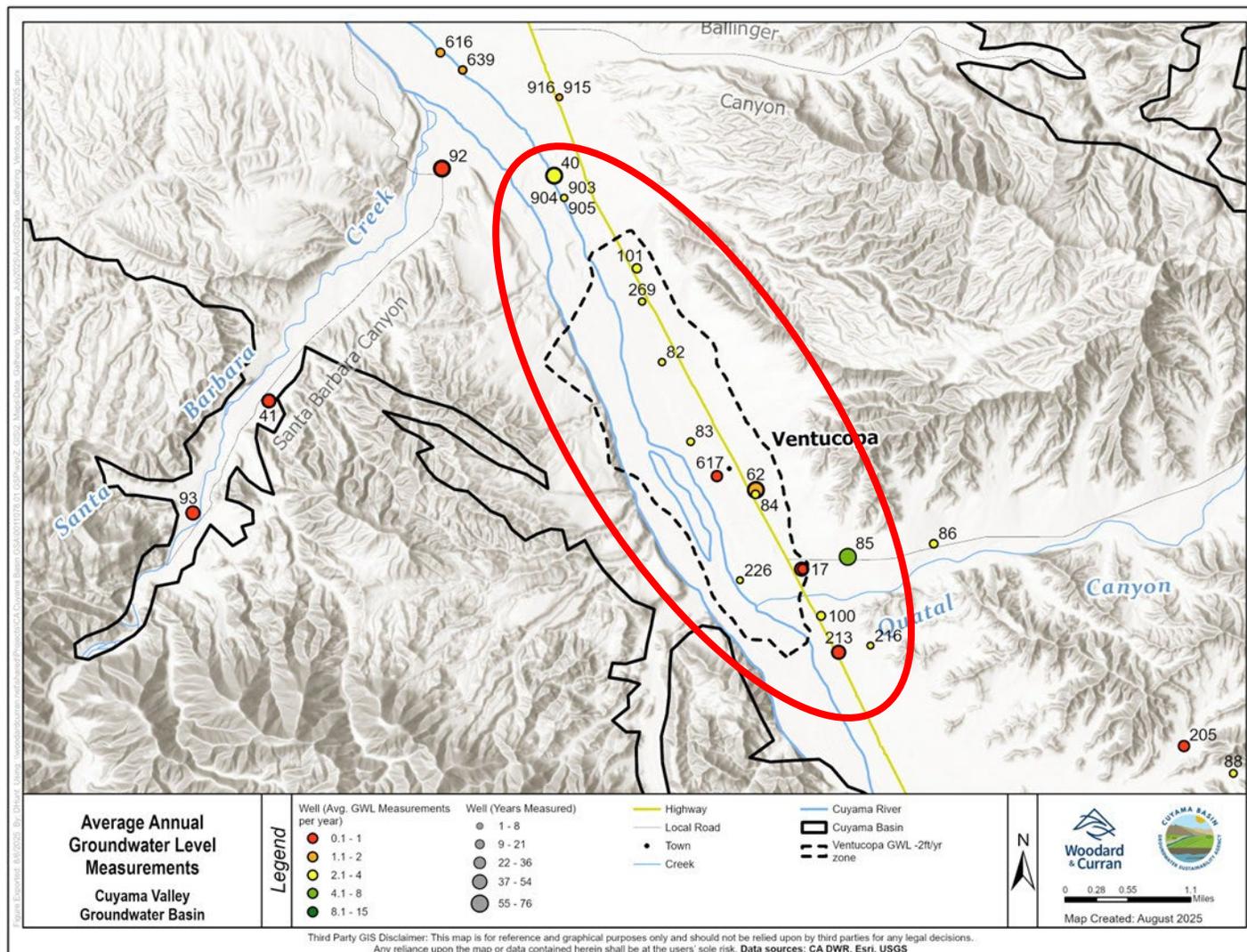


Simulated vs. Observed GWLs

- Compared two model runs with the observed GWLs:
 - Latest historical used in 2024 Annual Report (v0.31)
 - v0.31 + added observed streamflows at USGS 11136500 for after 2021 to stream node 36

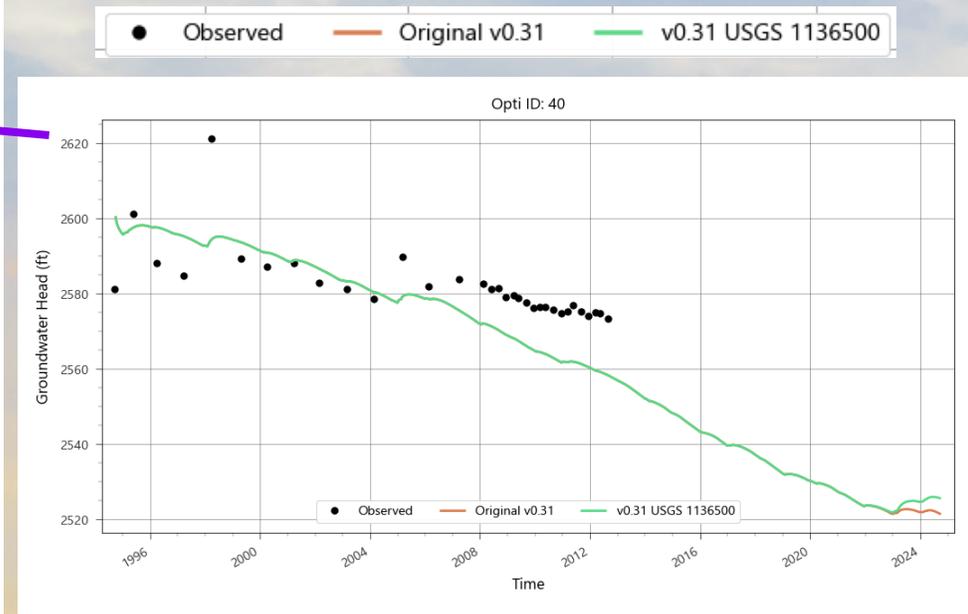
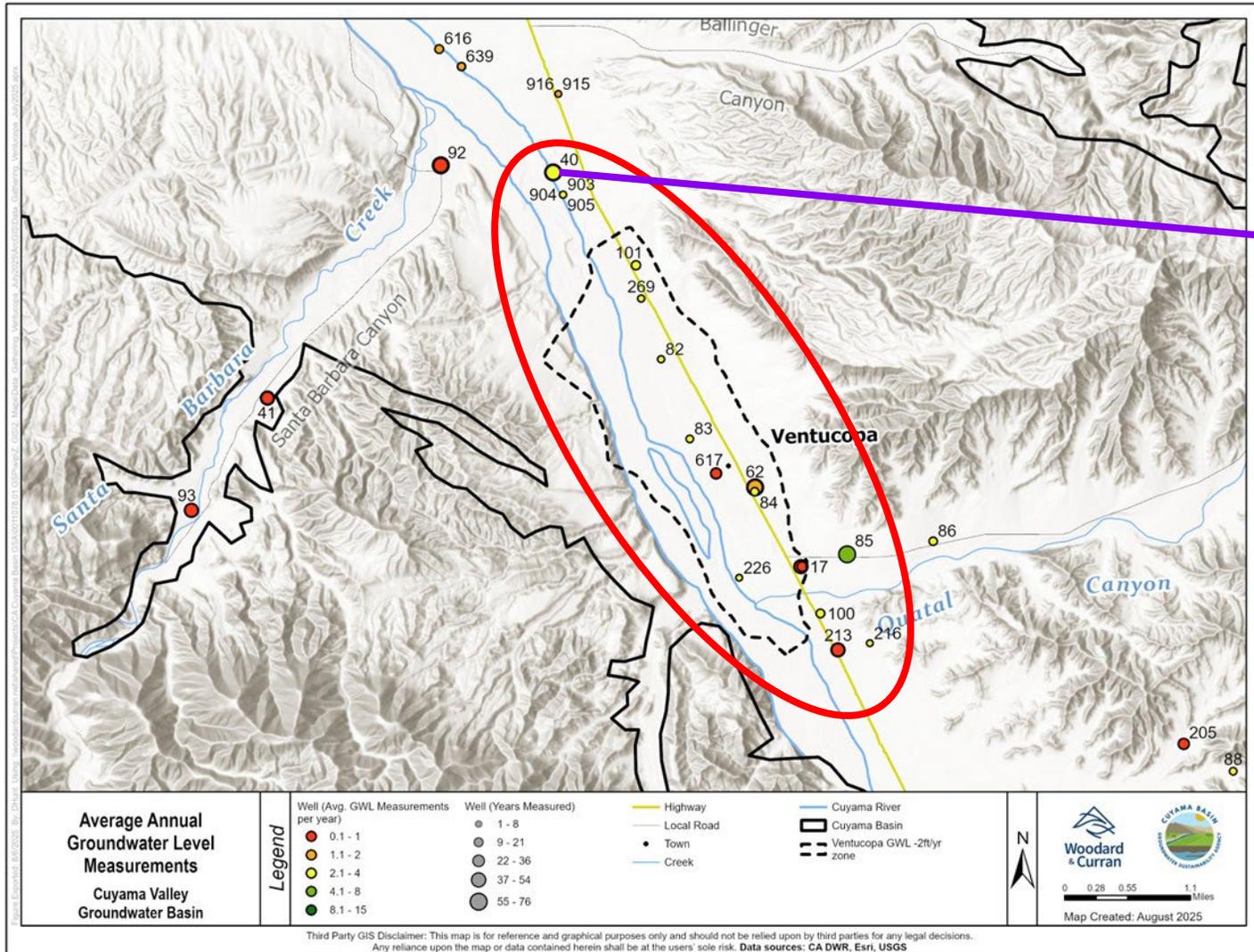


GWL Records Upstream of the SBC Fault past 1998

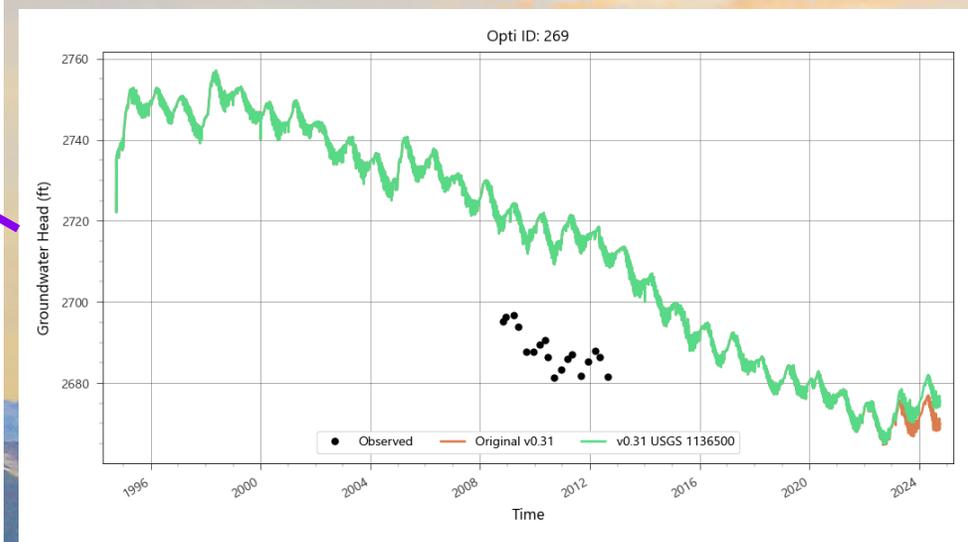
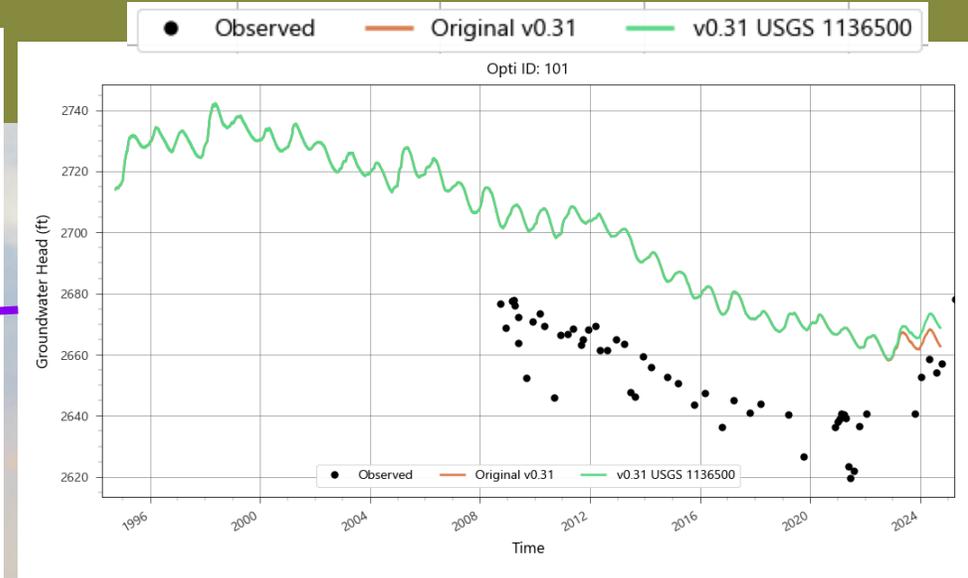
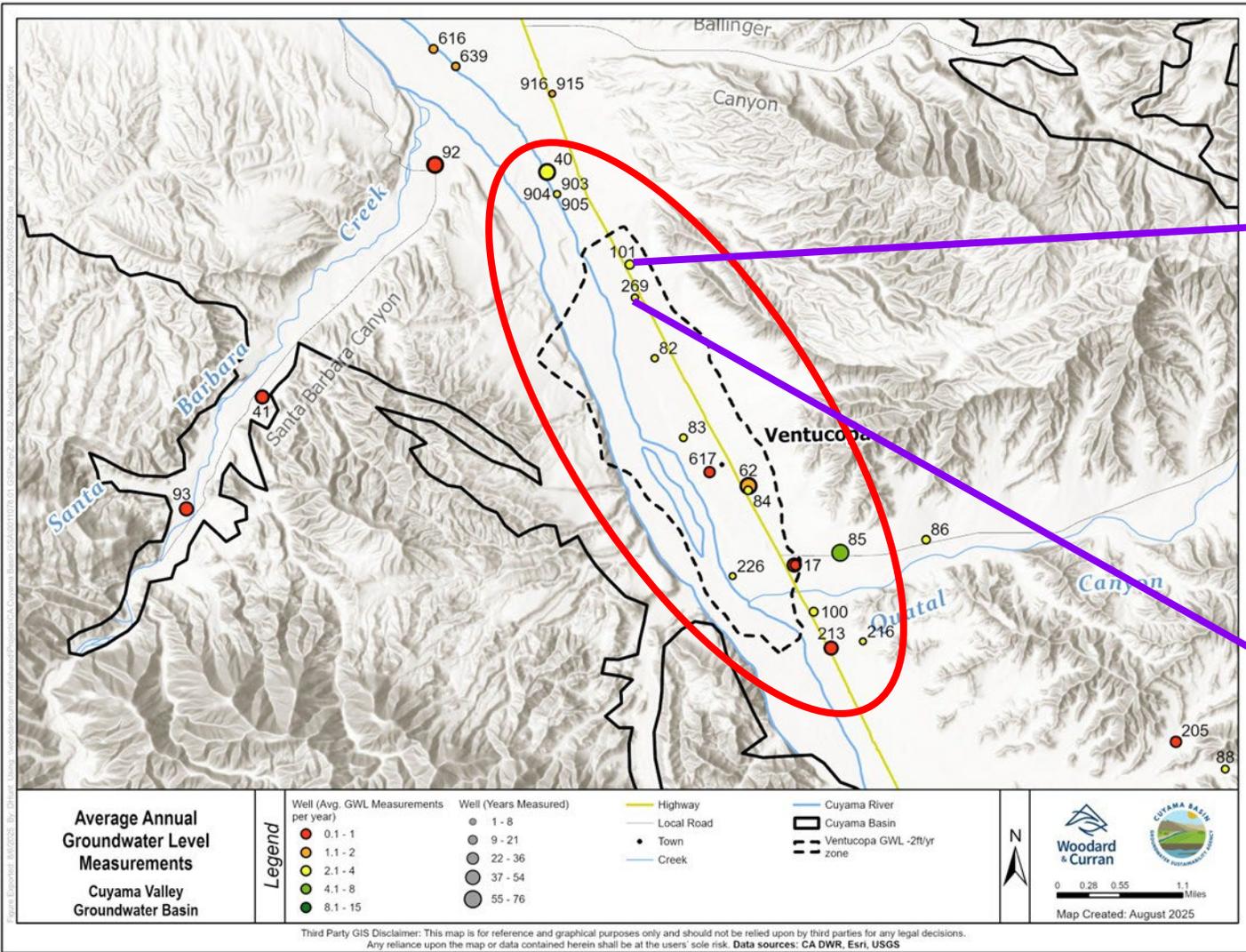


- Labels indicate OptiIDs.
- Red area is where we focus our efforts.

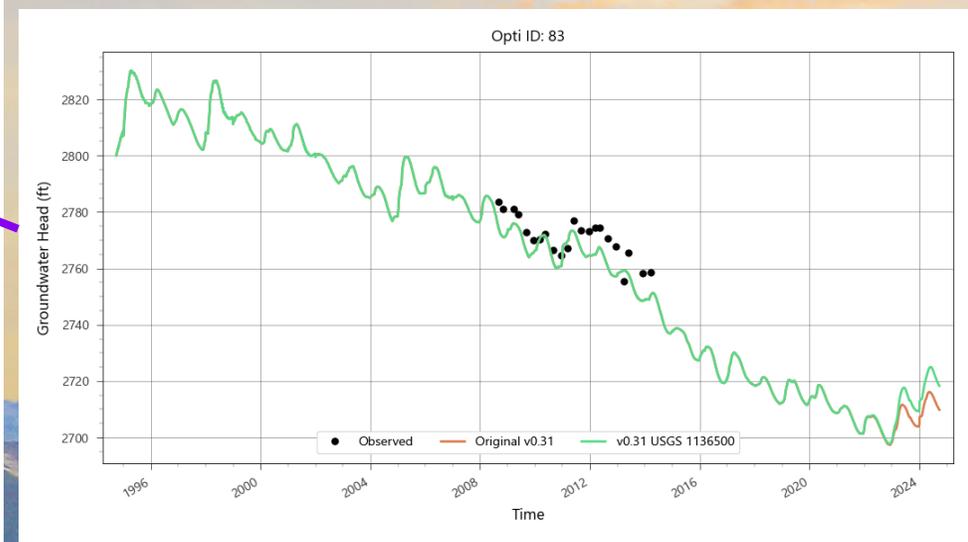
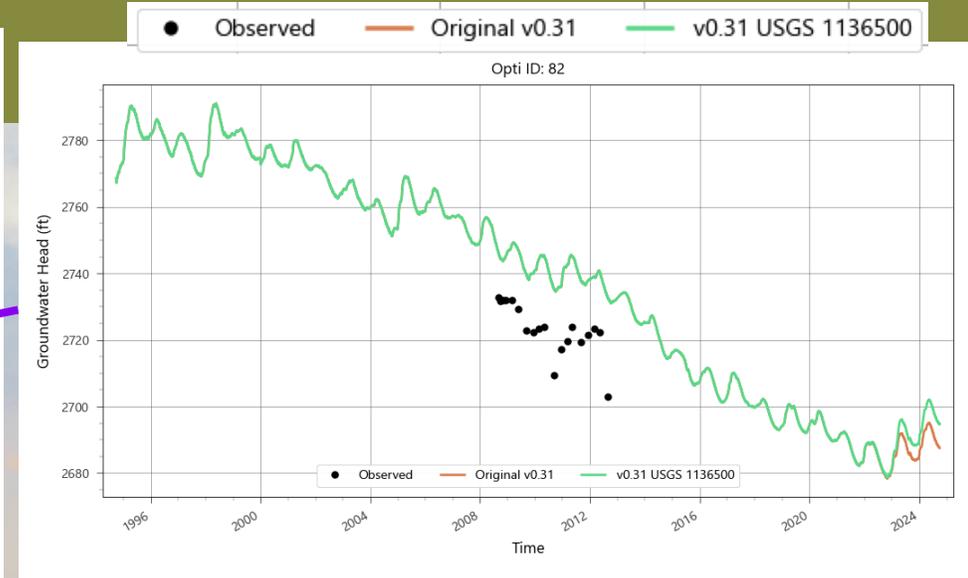
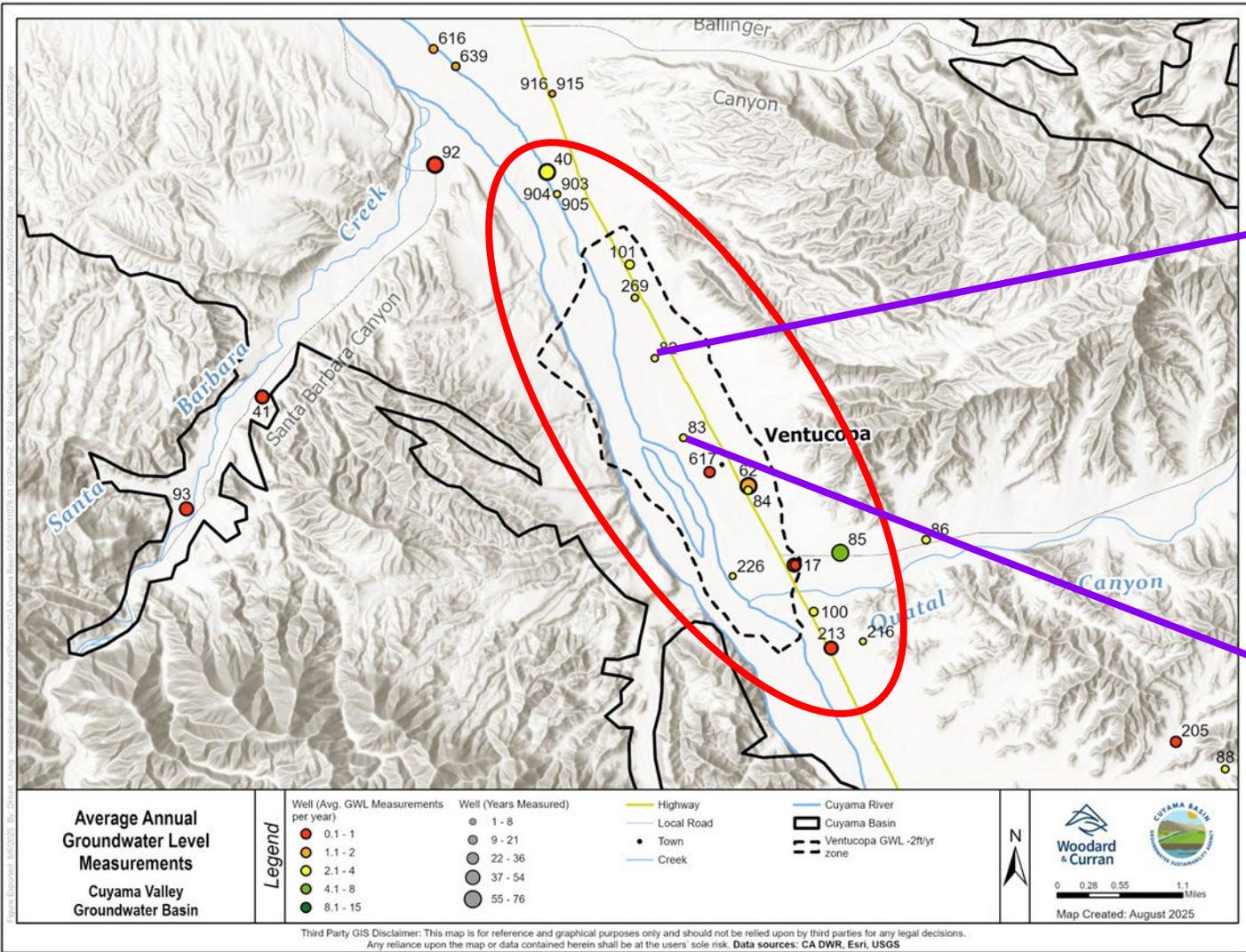
Simulated GWLs (v0.31)



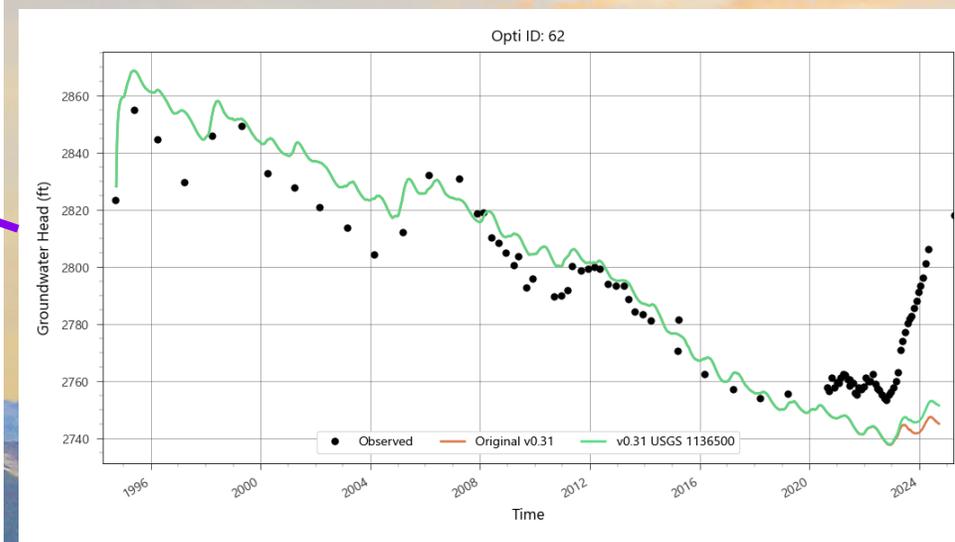
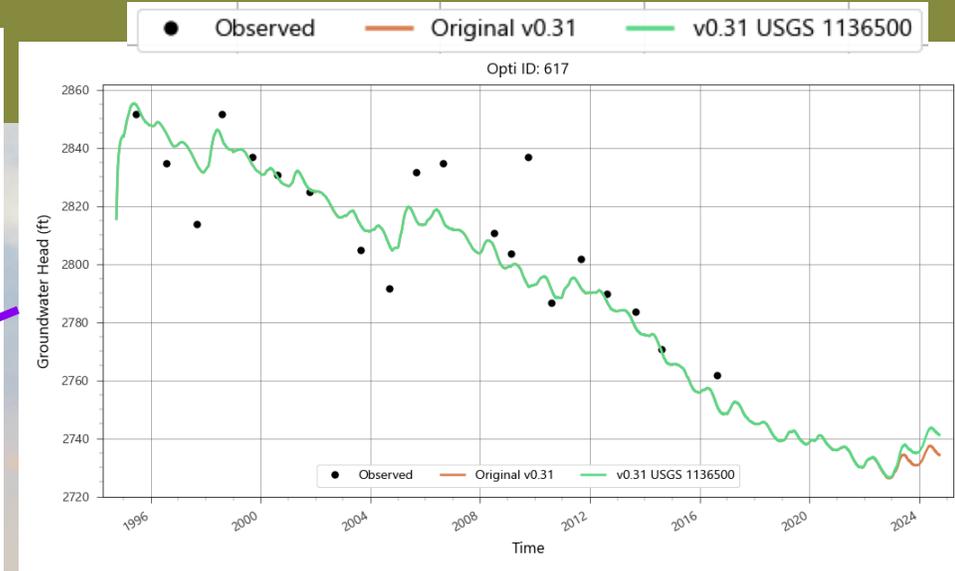
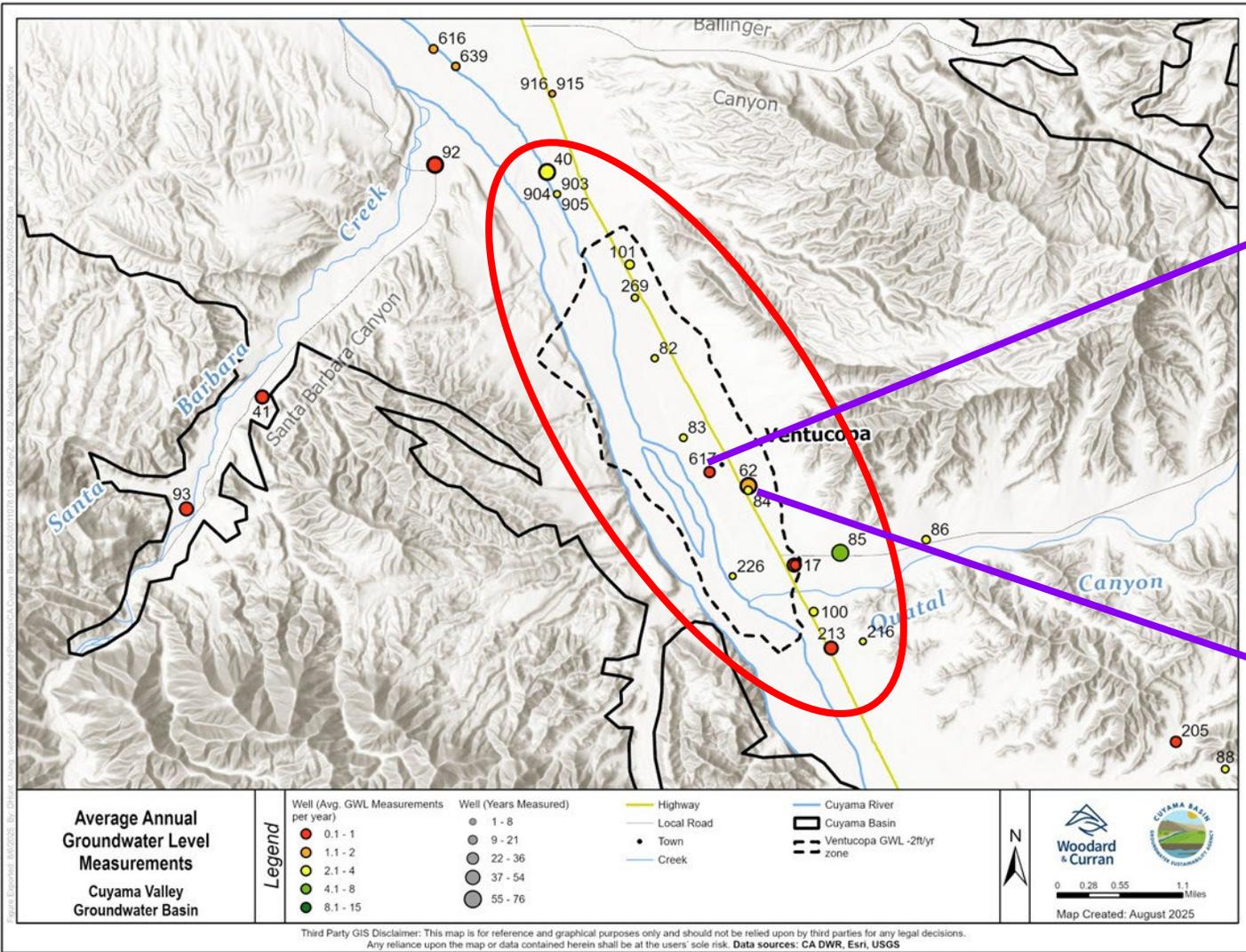
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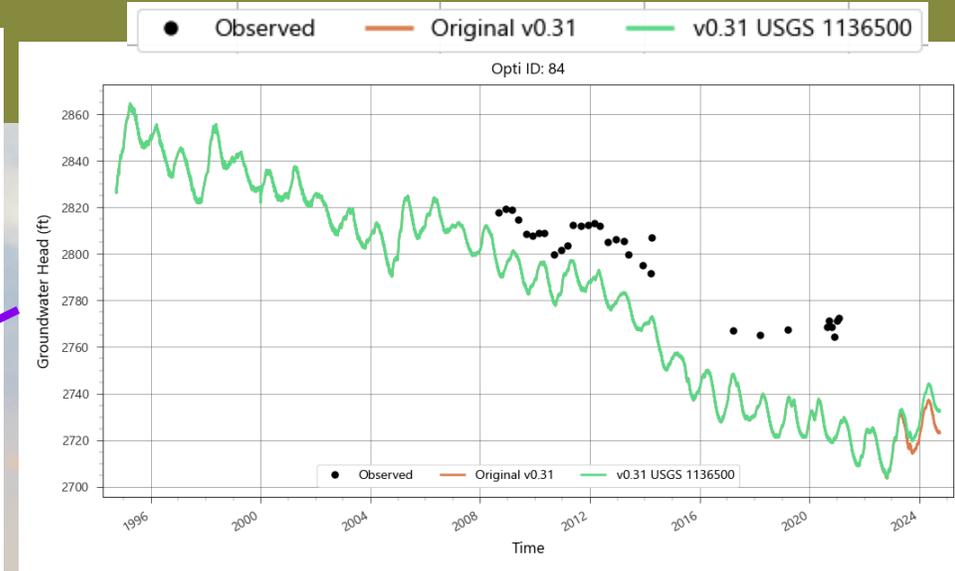
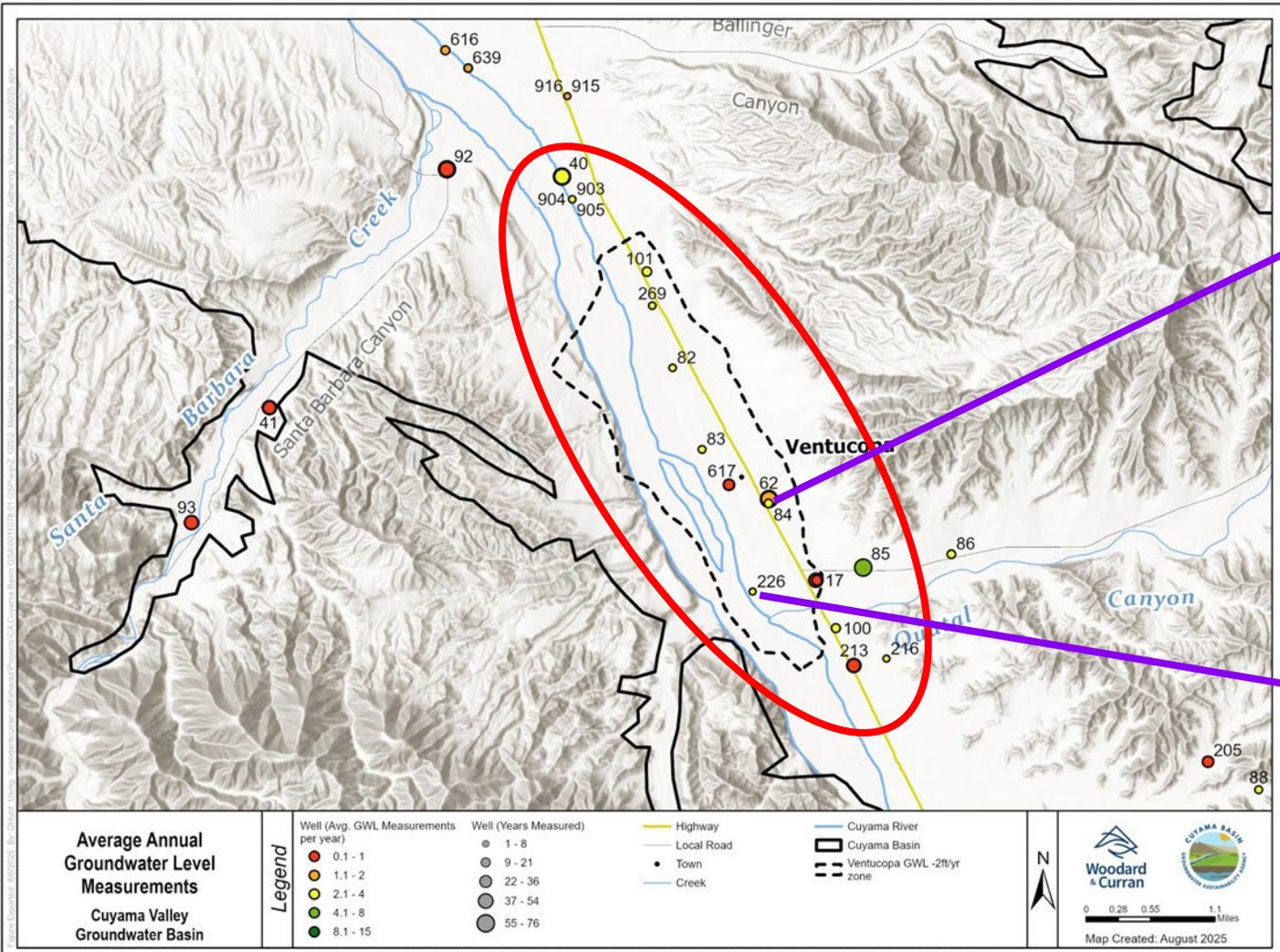
Simulated GWLs (v0.31)



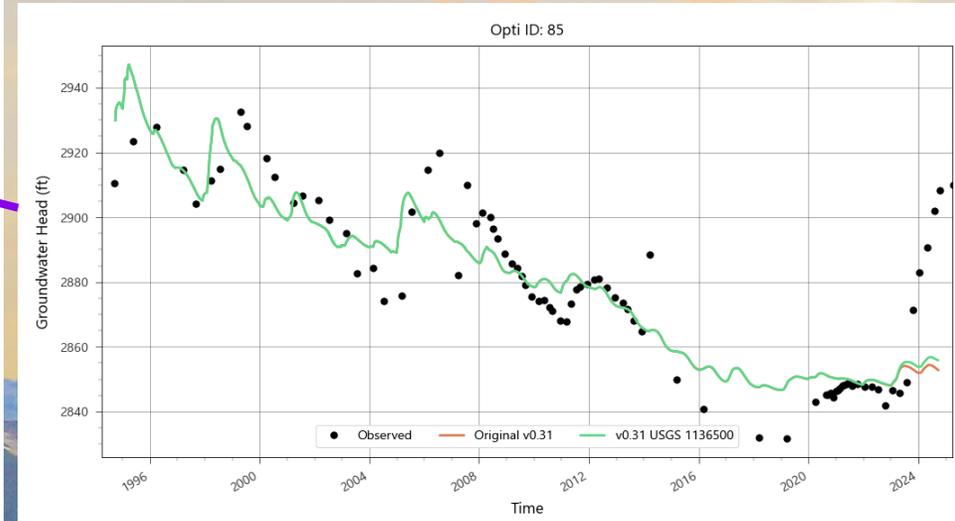
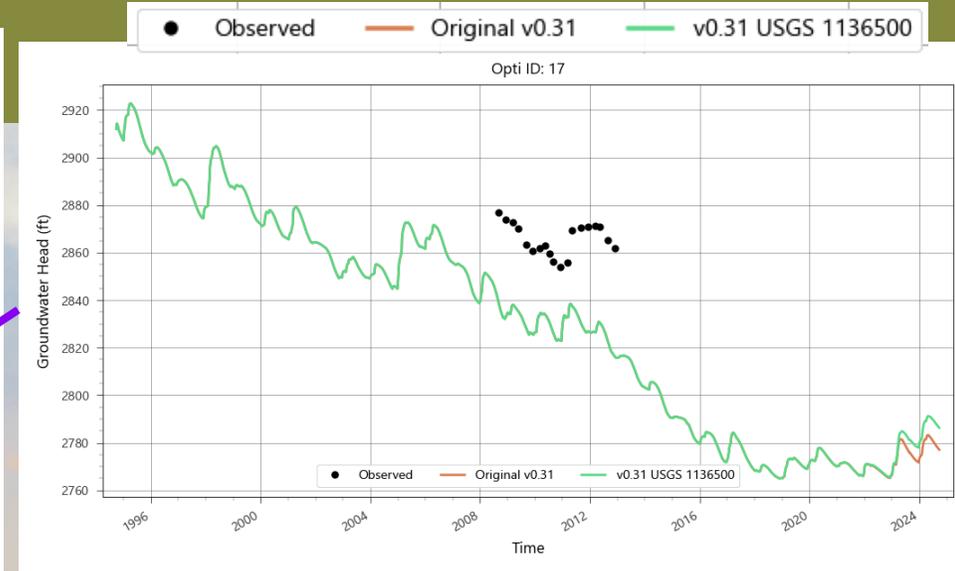
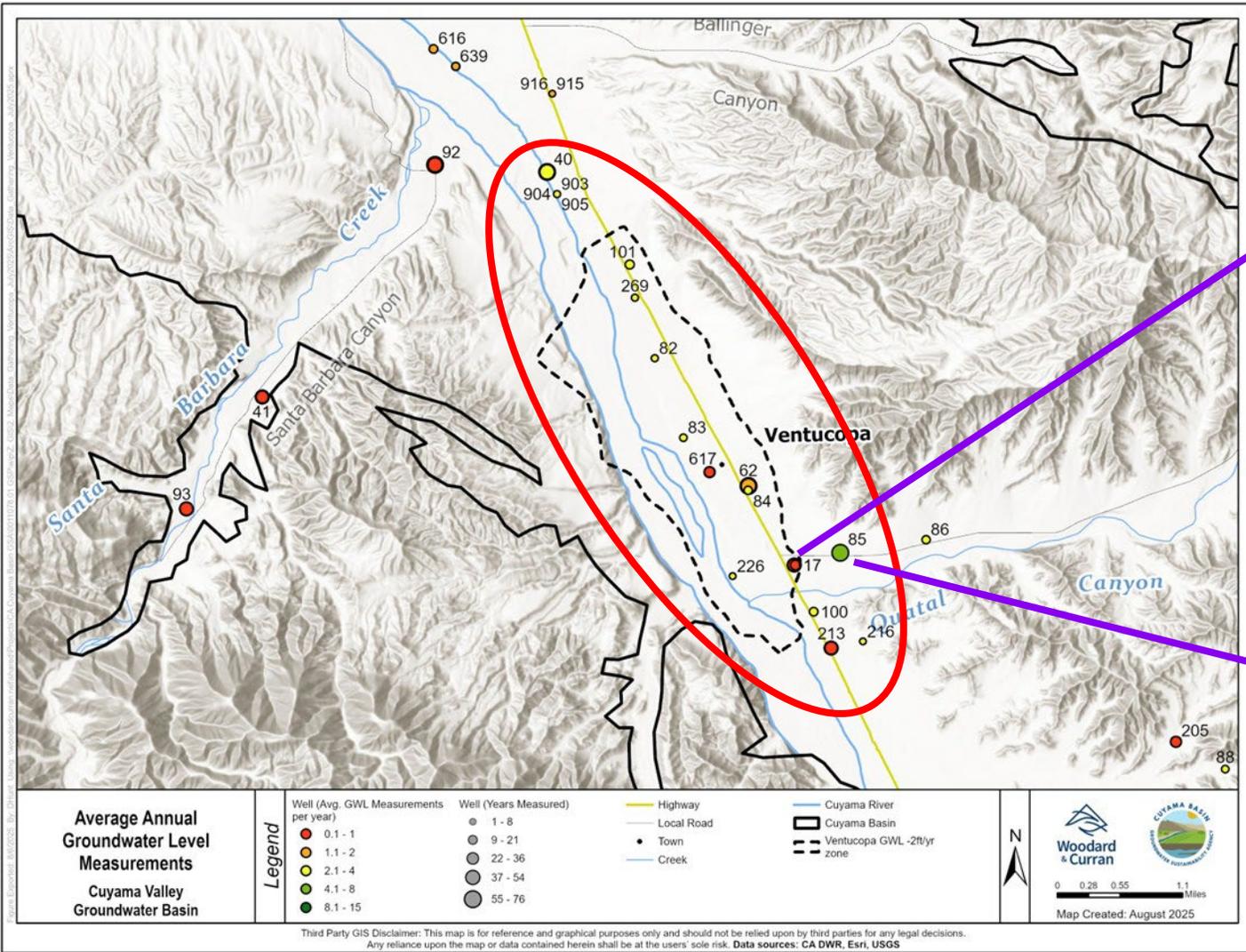
Simulated GWLs (v0.31)



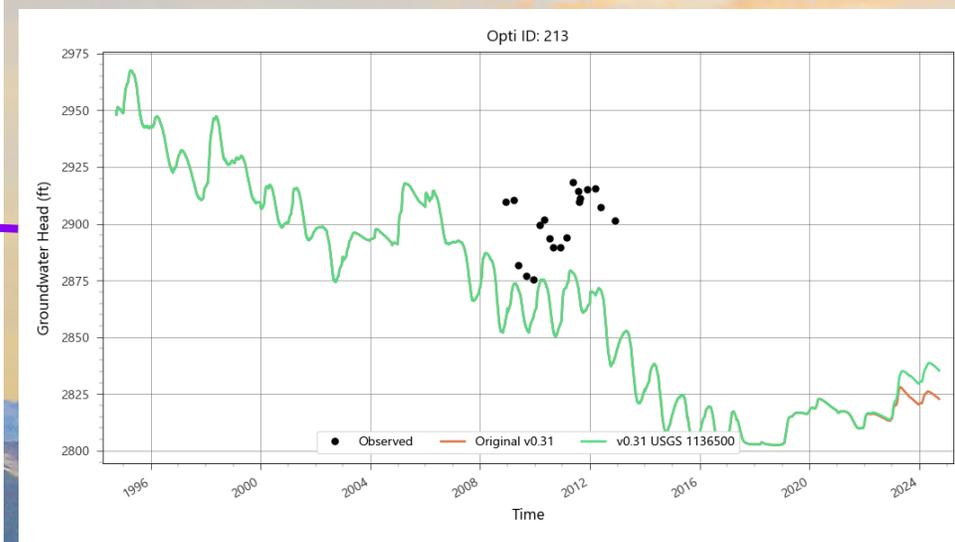
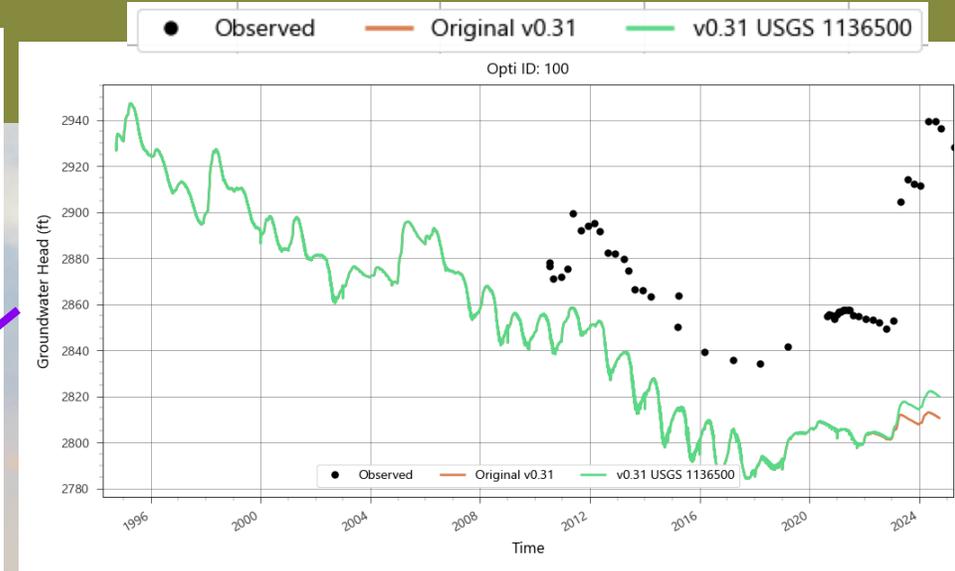
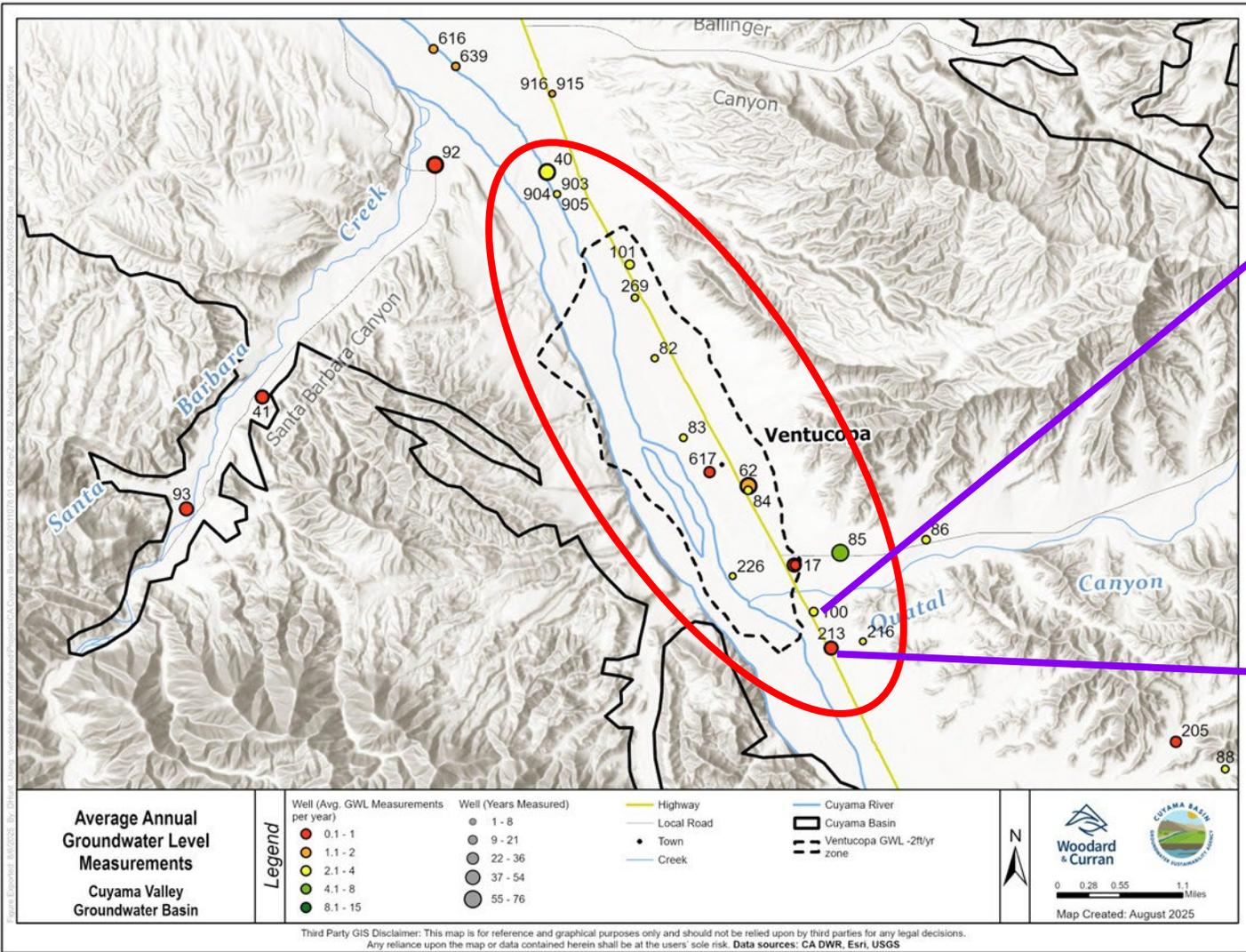
Simulated GWLs (v0.31)



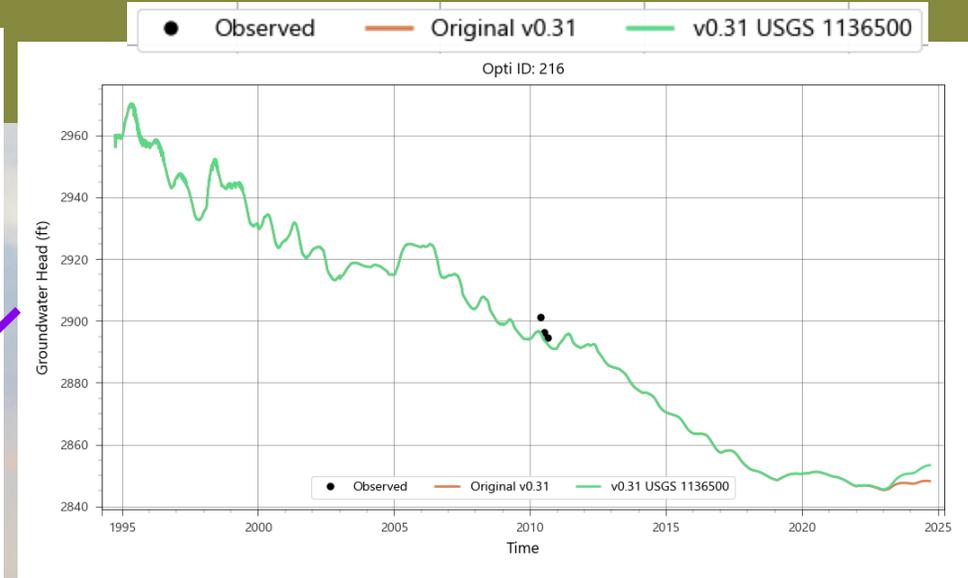
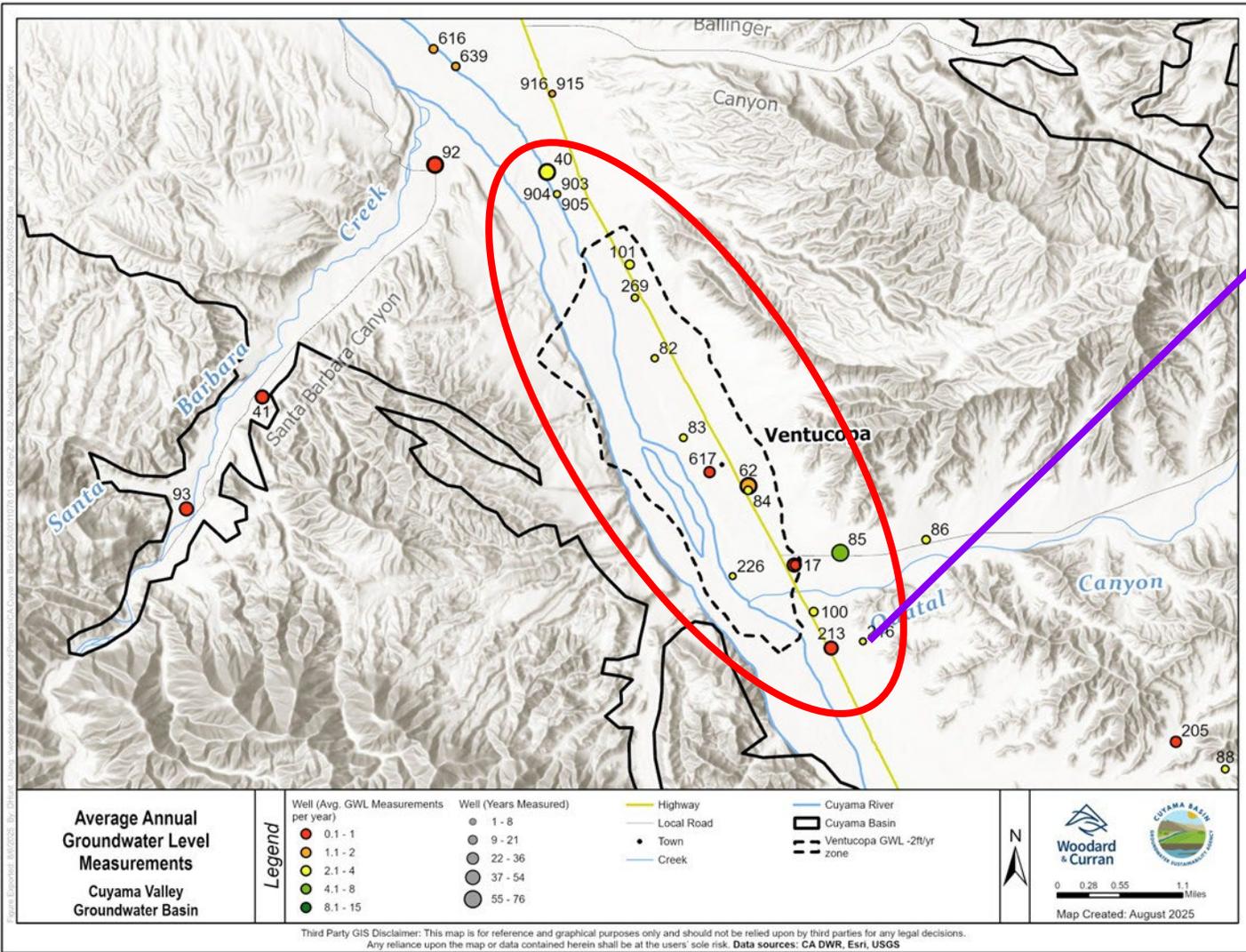
Simulated GWLs (v0.31)



Simulated GWLs (v0.31)



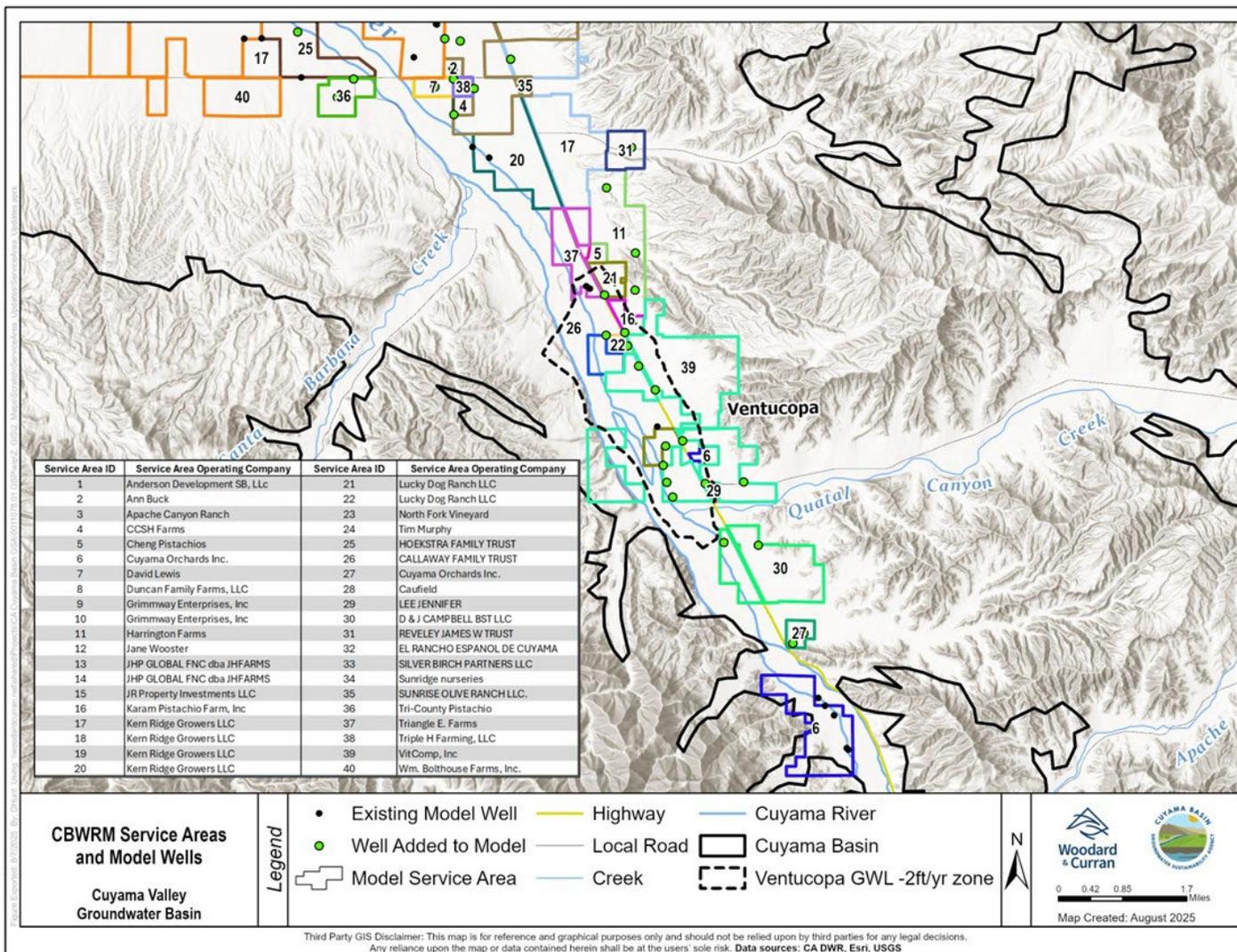
Simulated GWLs (v0.31)



MODEL RESULTS

Simulated vs Reported Pumping

Pumping



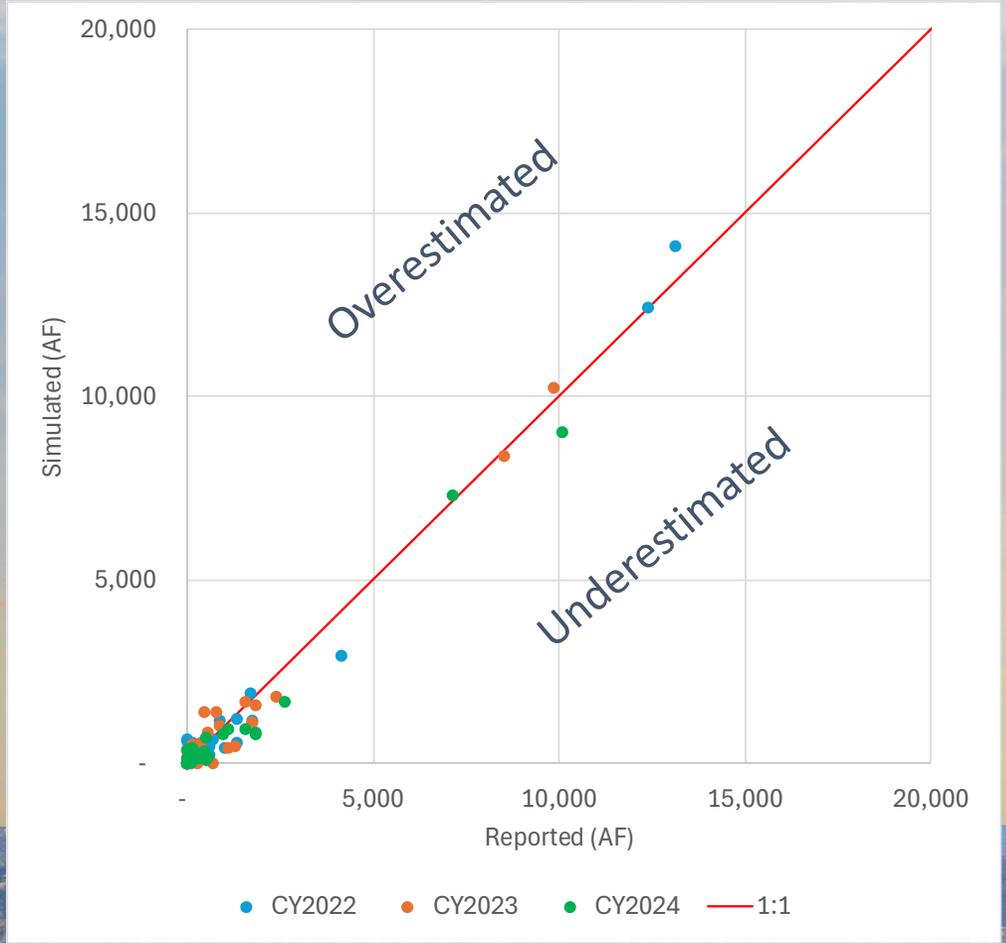
- Digitized 2024 monthly pumping data.
- Compared Reported vs. Simulated pumping for each Operating Company 2022, 2023, and 2024.

Simulated Pumping (v0.31)

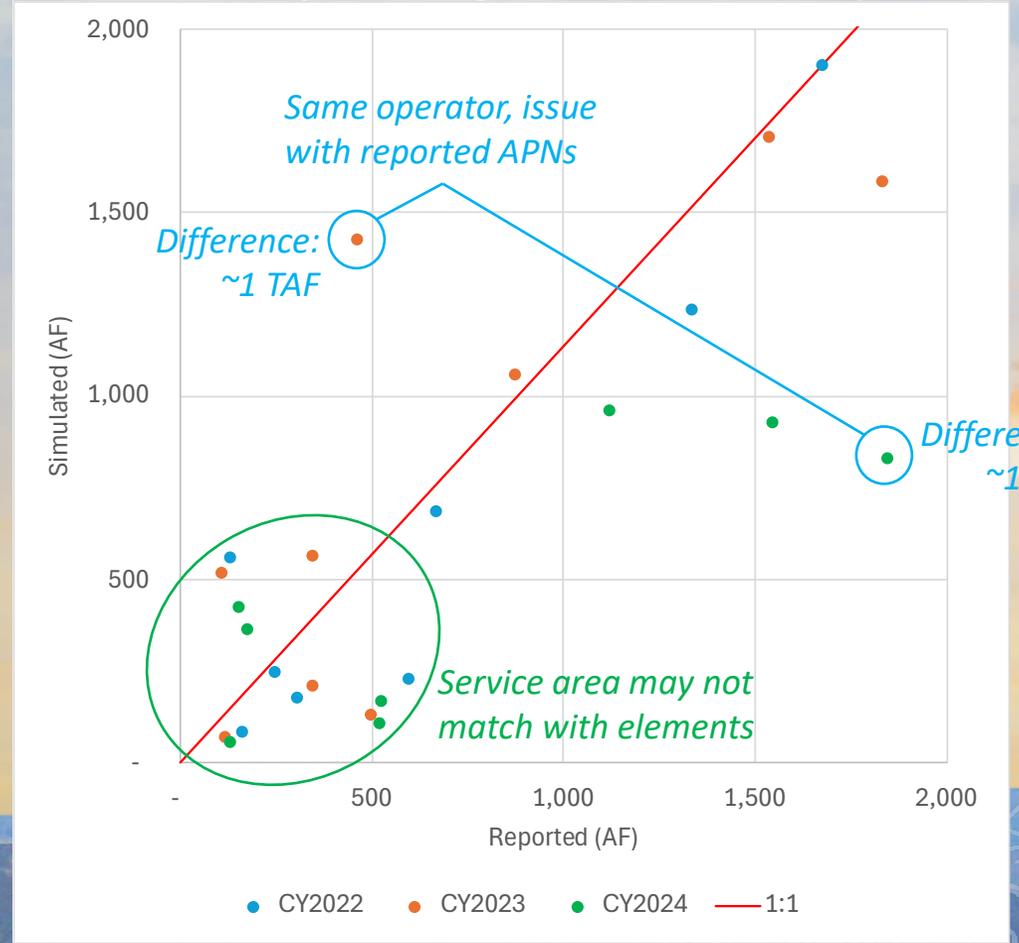
*Only reported entities are included in this comparison

AF	Reported	Simulated
2022	5,121	5,125
2023	6,118	7,272
2024	6,011	3,841

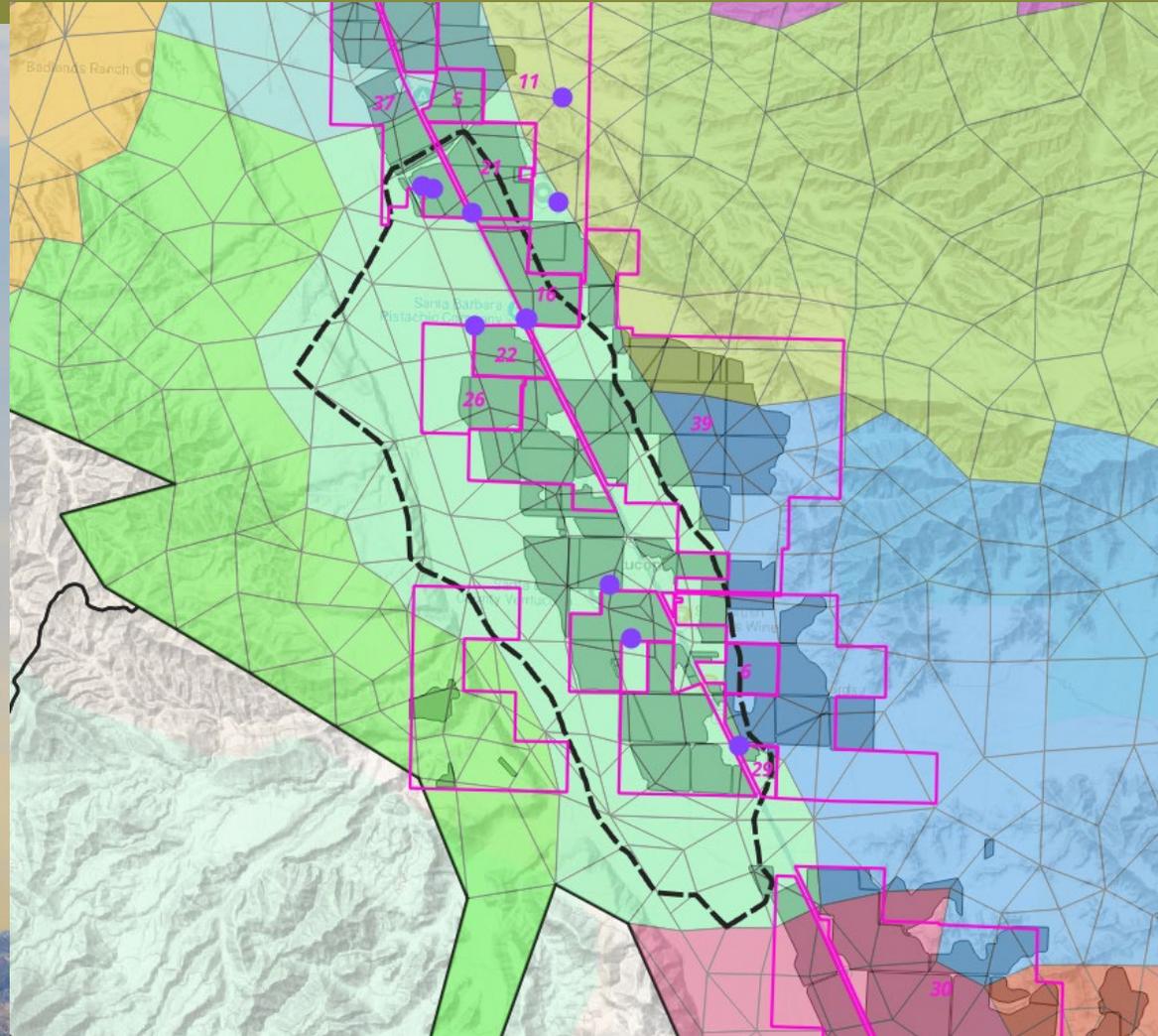
Entire Cuyama Basin



Ventucopa Management Area Vicinity



CBWRM Elements vs Service Areas

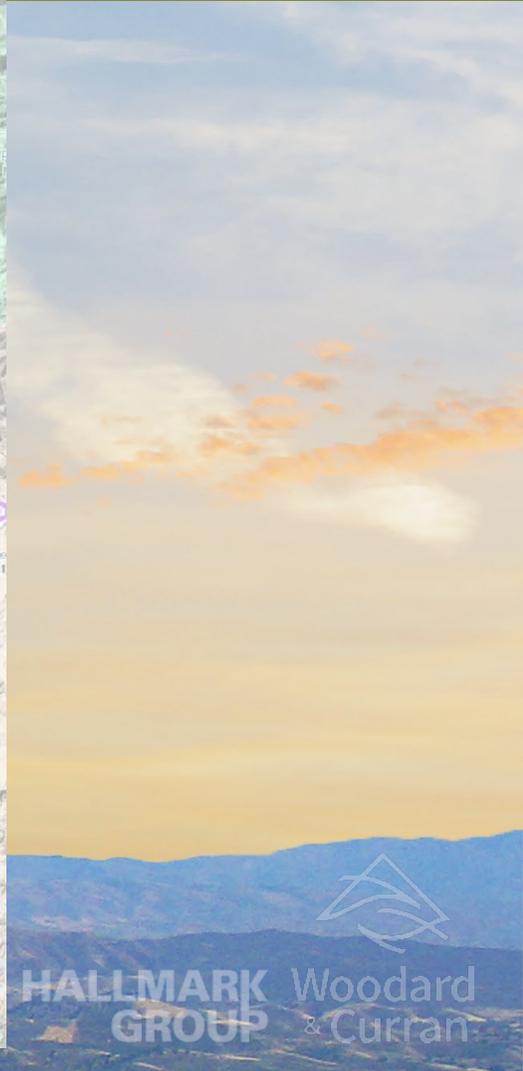
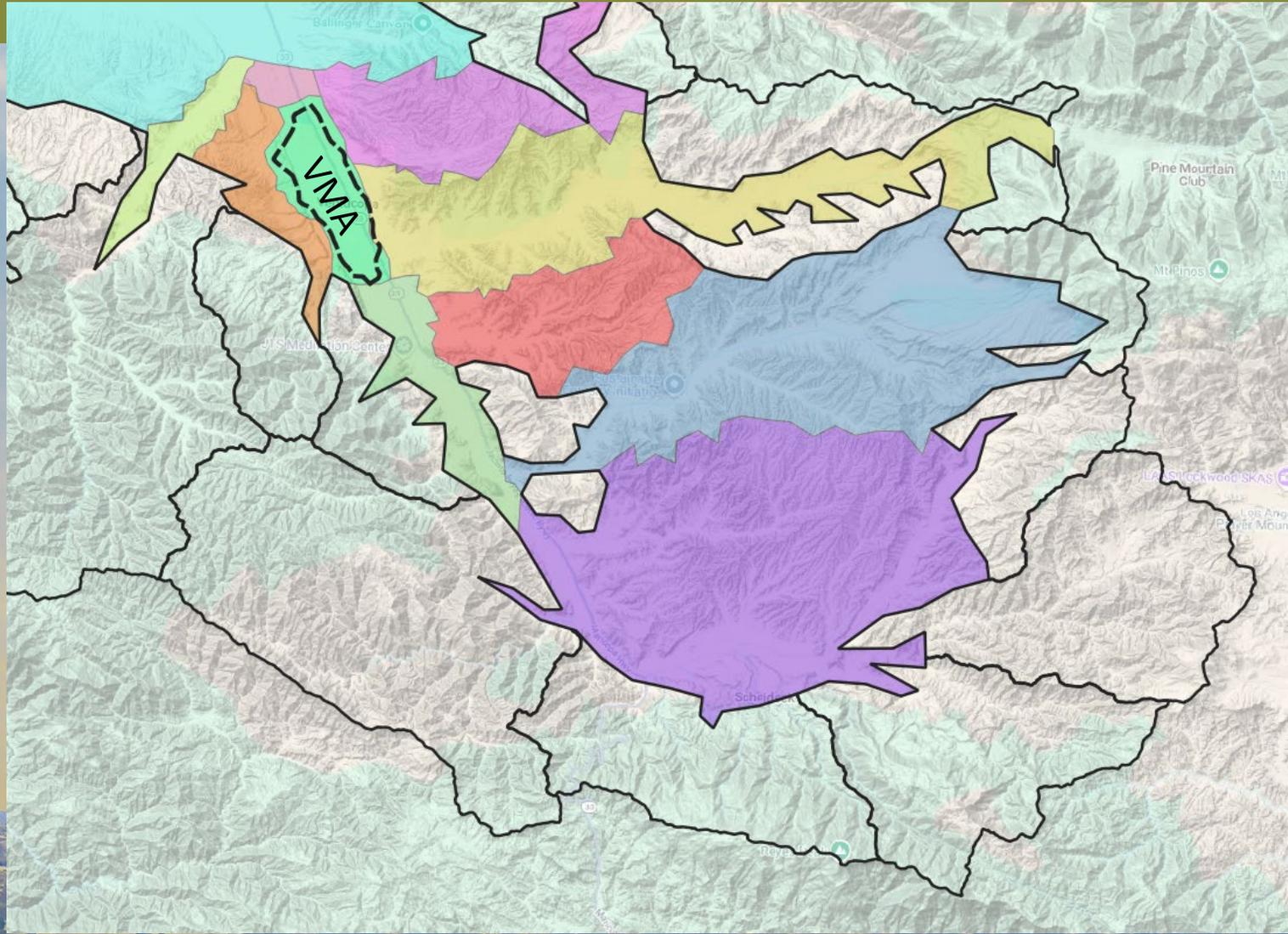


MODEL RESULTS

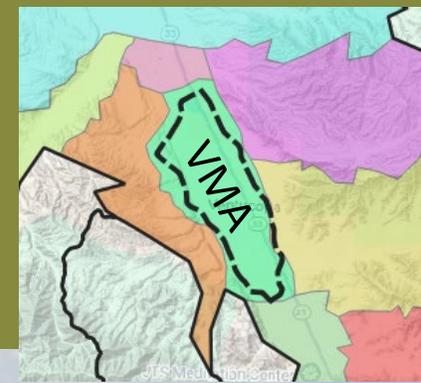
Water Budgets



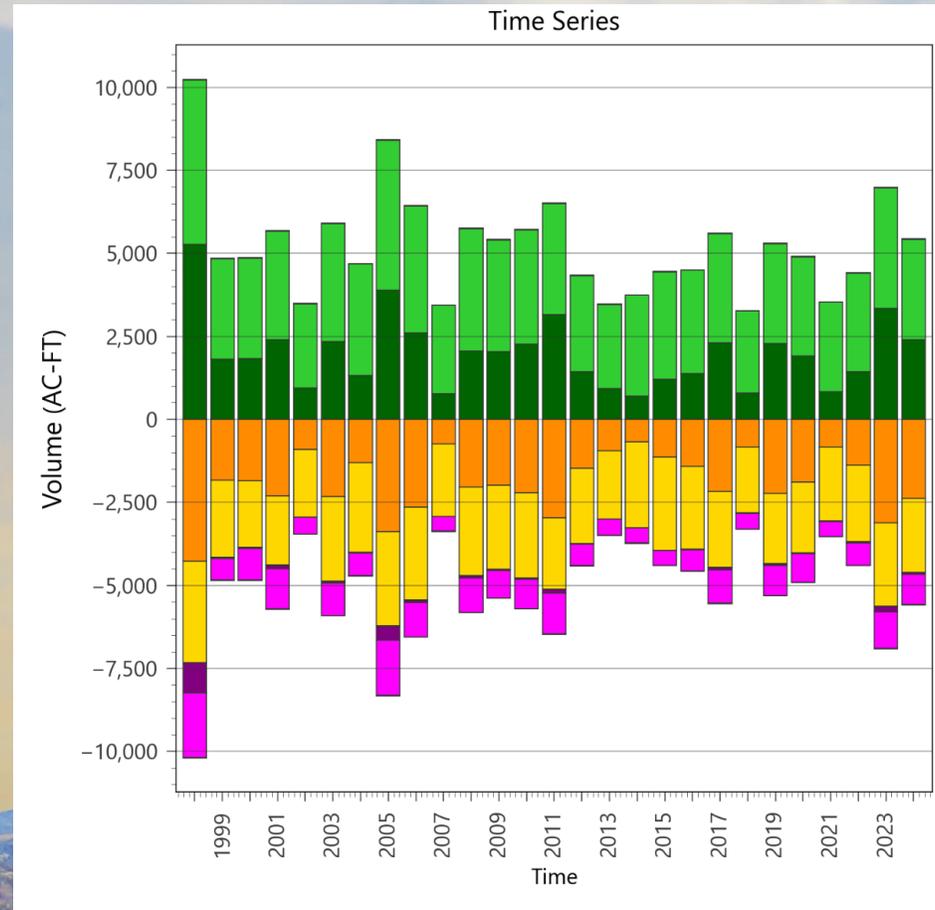
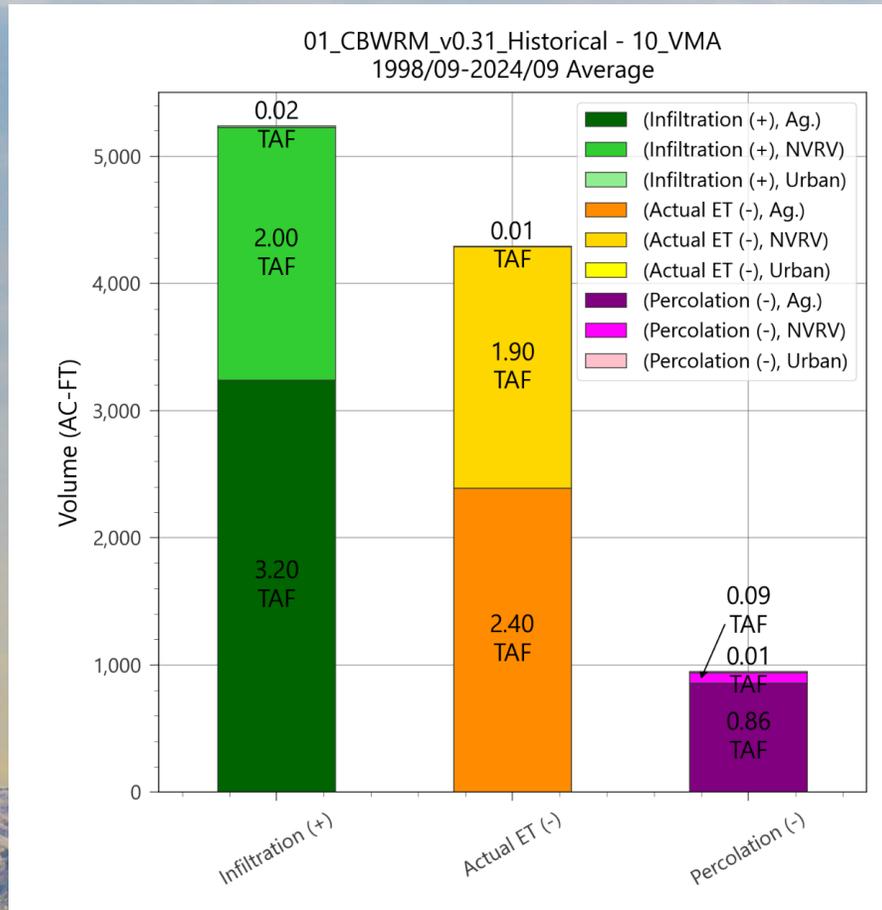
Water Budget Zones



RZ Budget for VMA (v0.31)

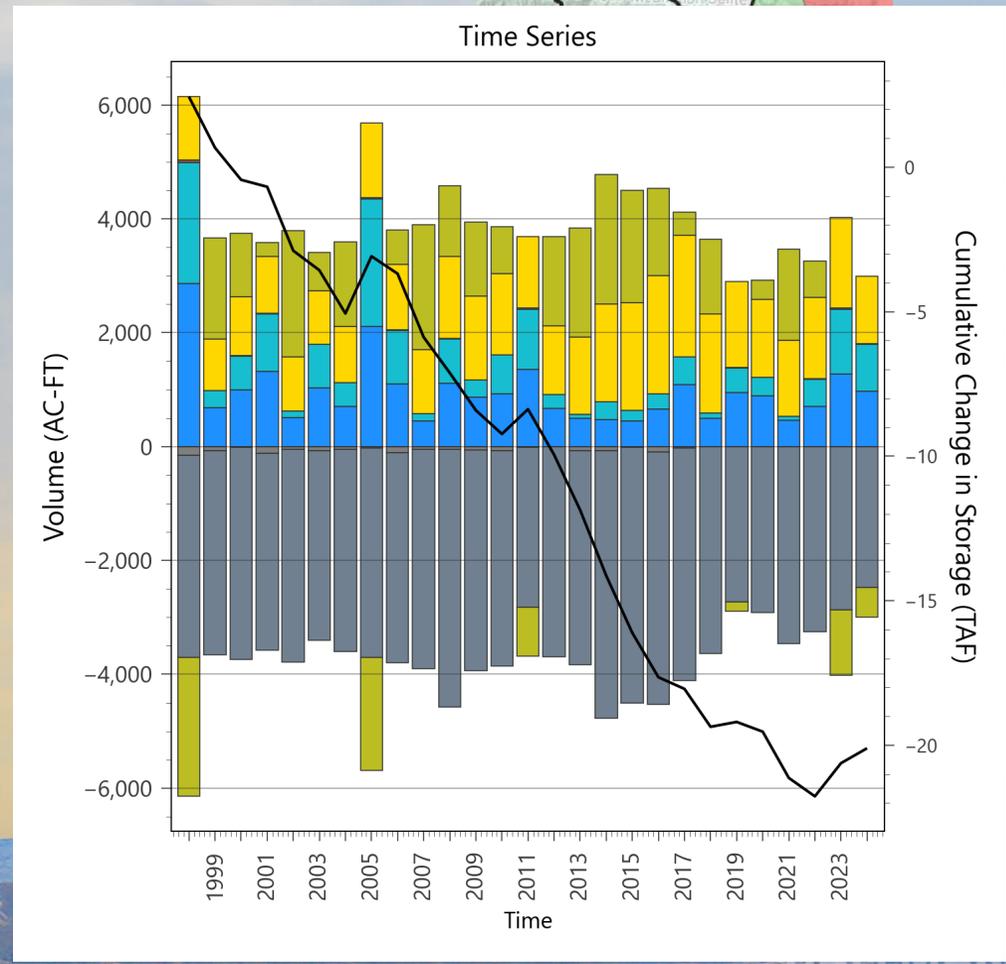
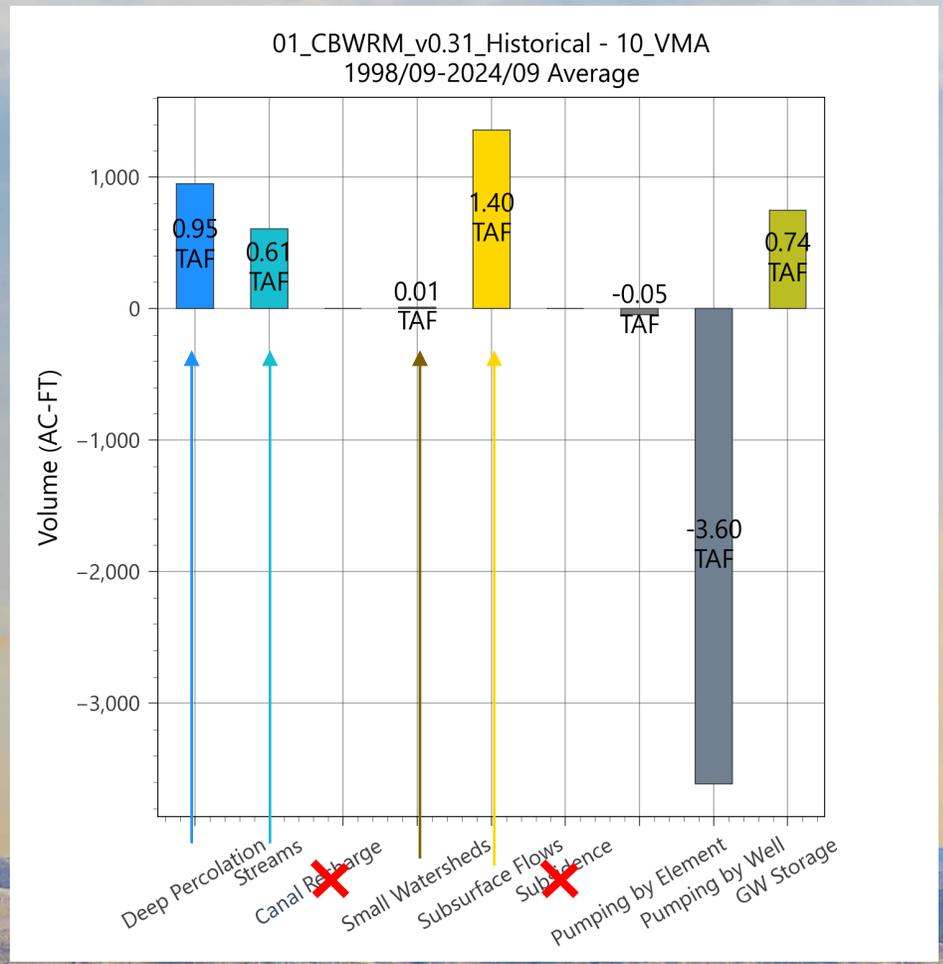
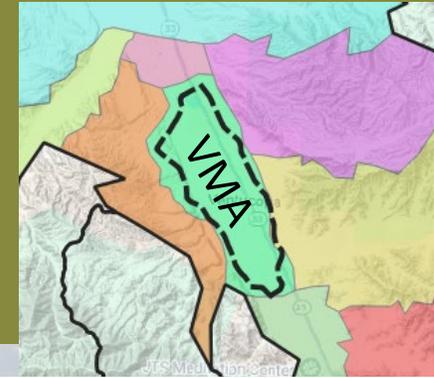


Infiltration = Precipitation + Applied Water - Runoff



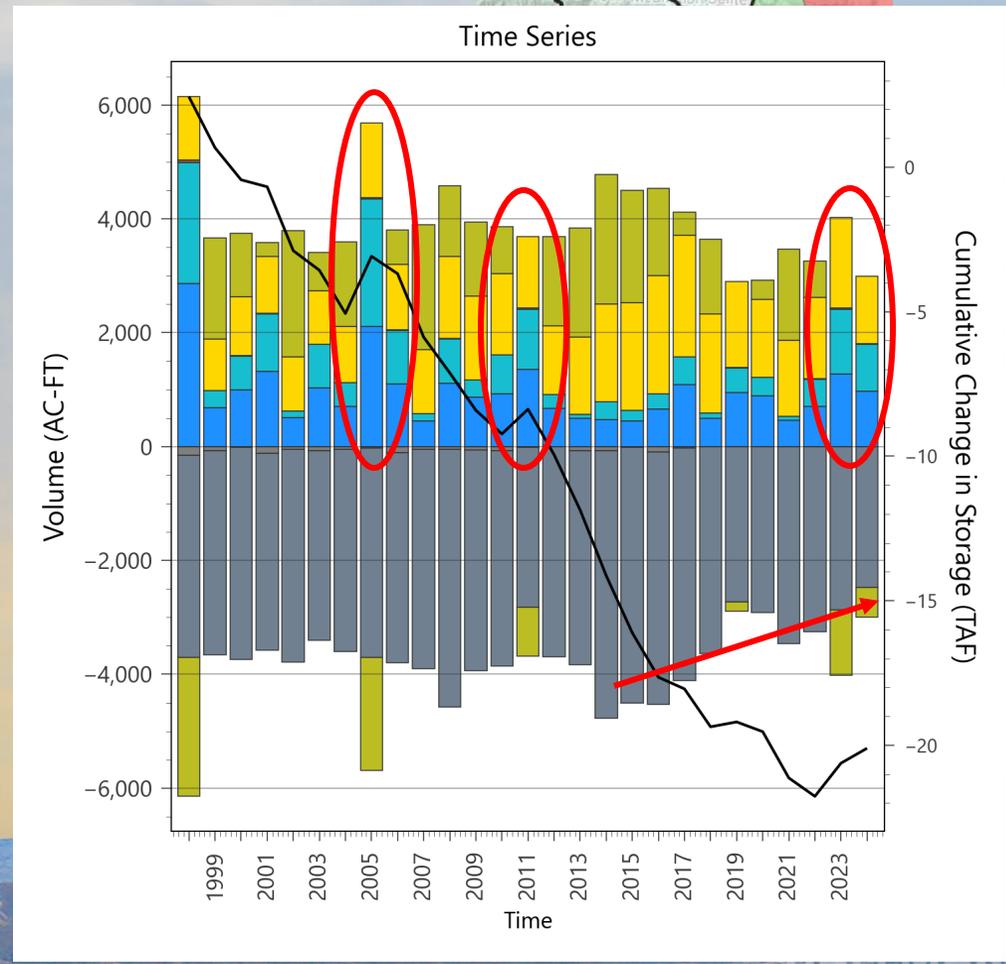
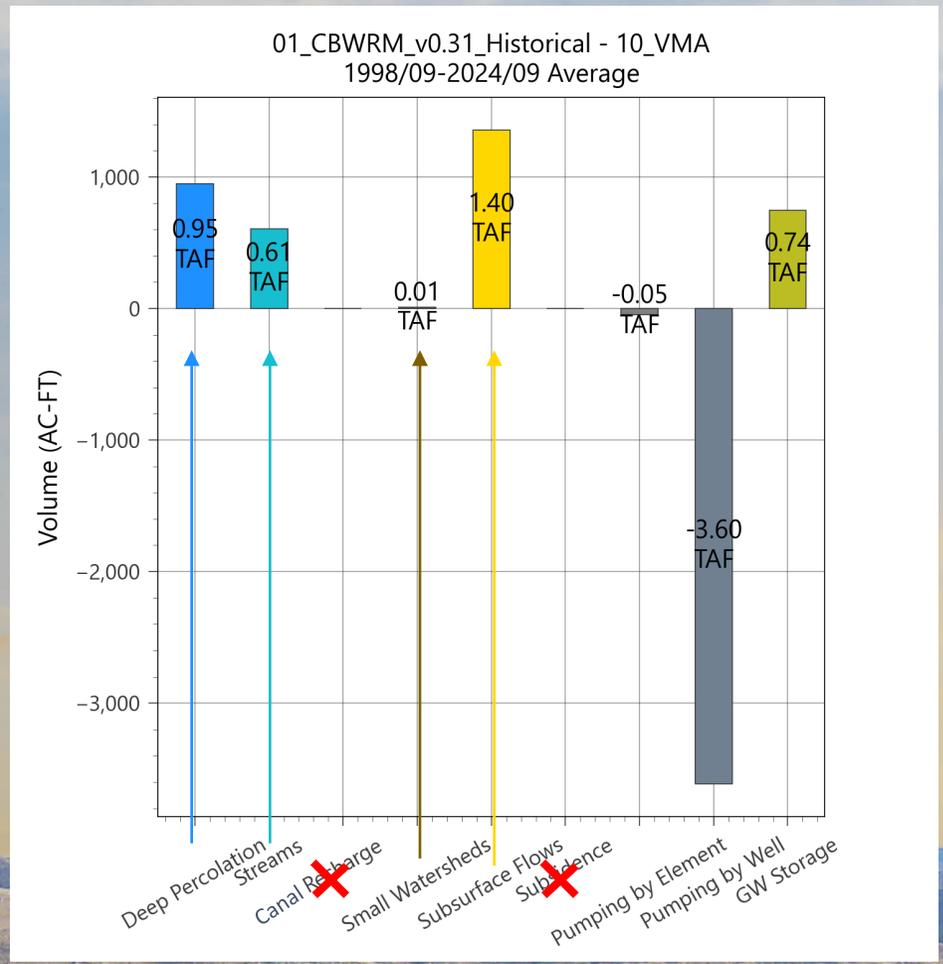
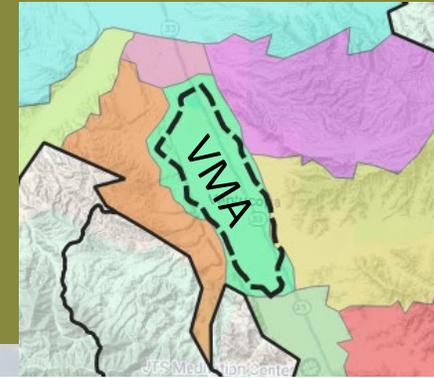
- ~80% of the infiltration goes to ET.
- ~20% goes to percolation.
- ~85% of the percolation is from ag. area

GW Budget for VMA (v0.31)



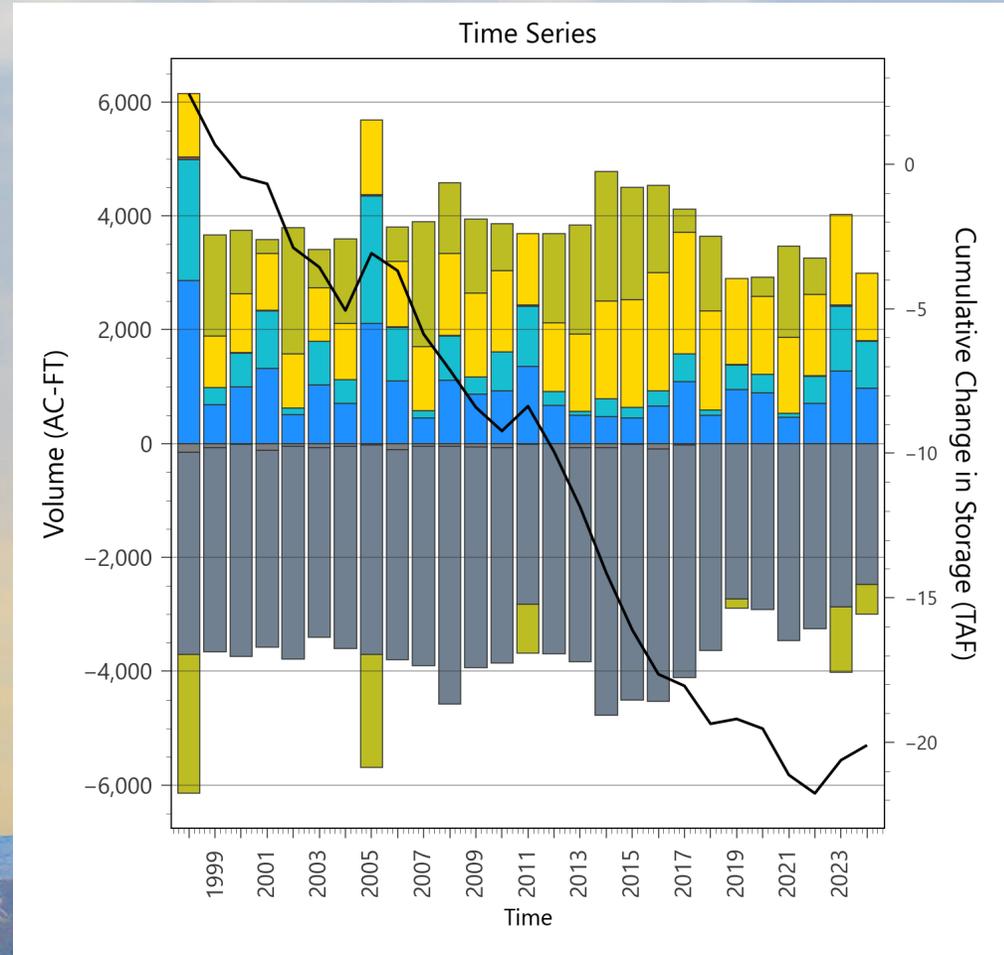
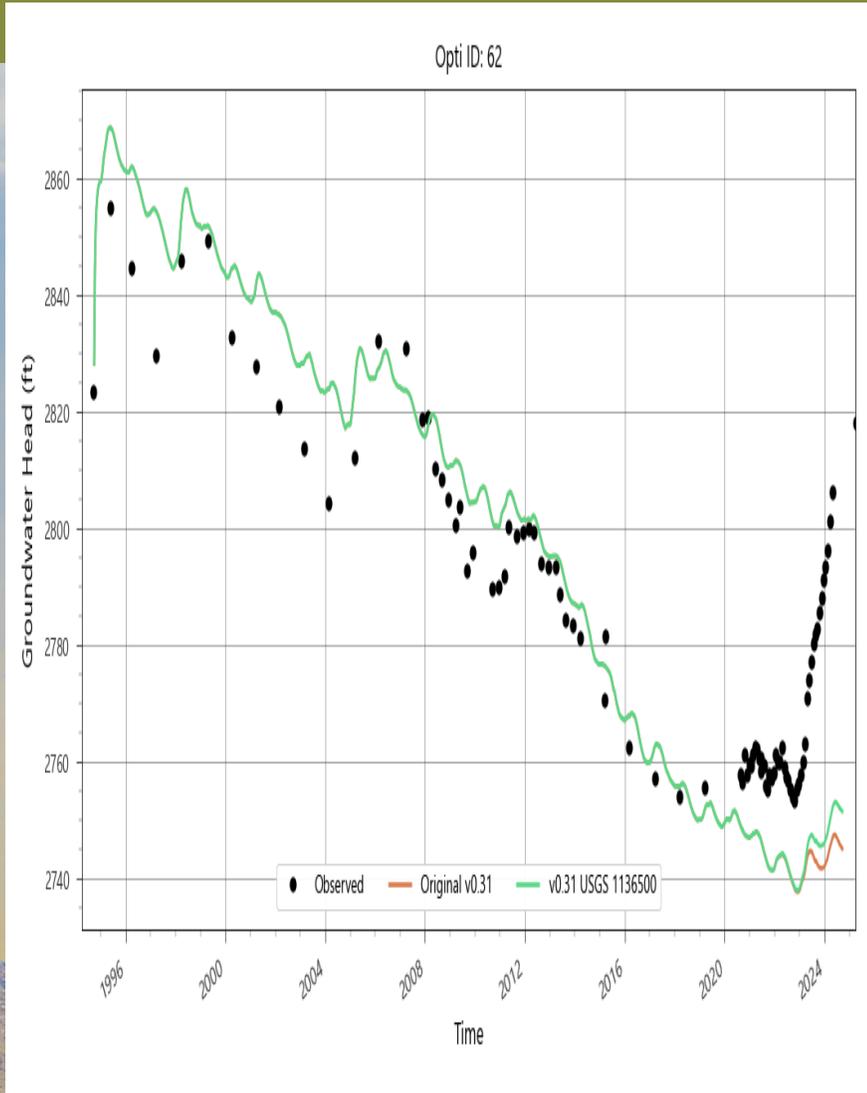
Net

GW Budget for VMA (v0.31)

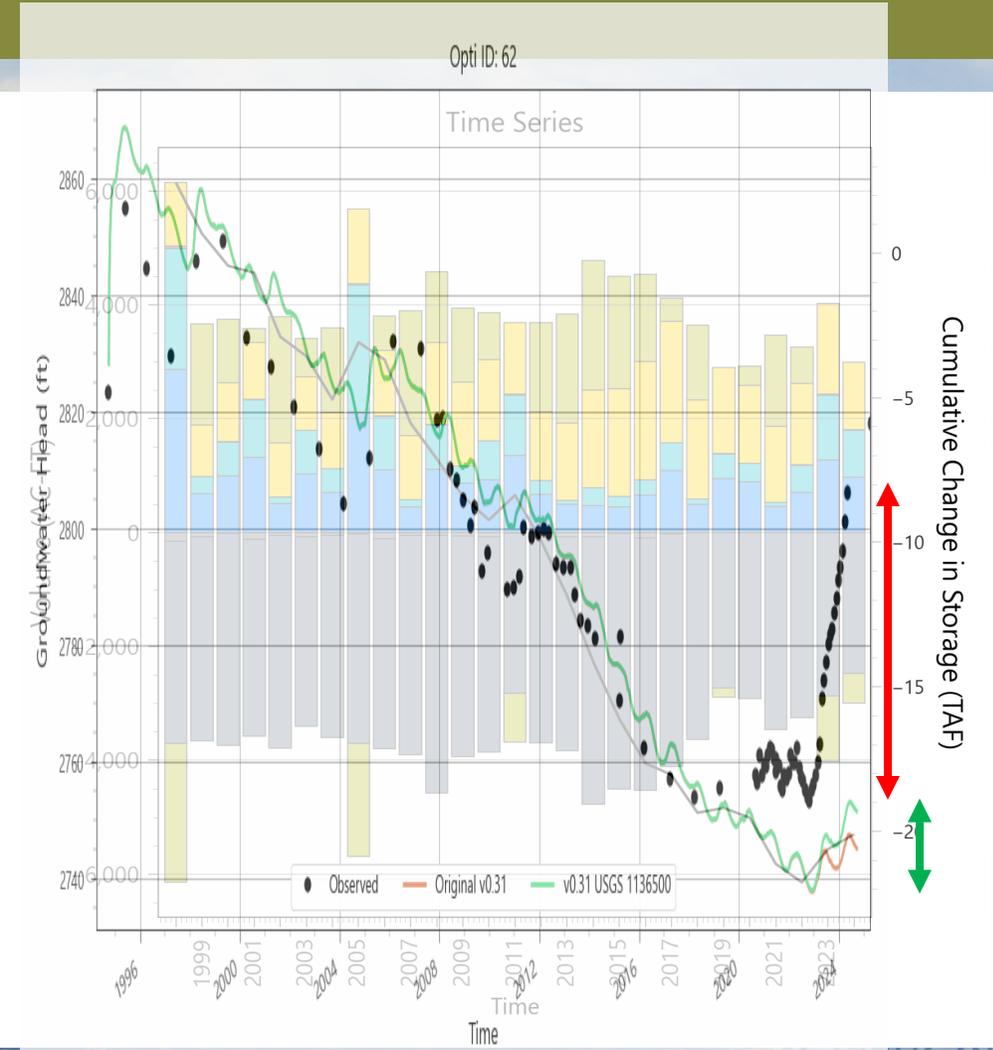


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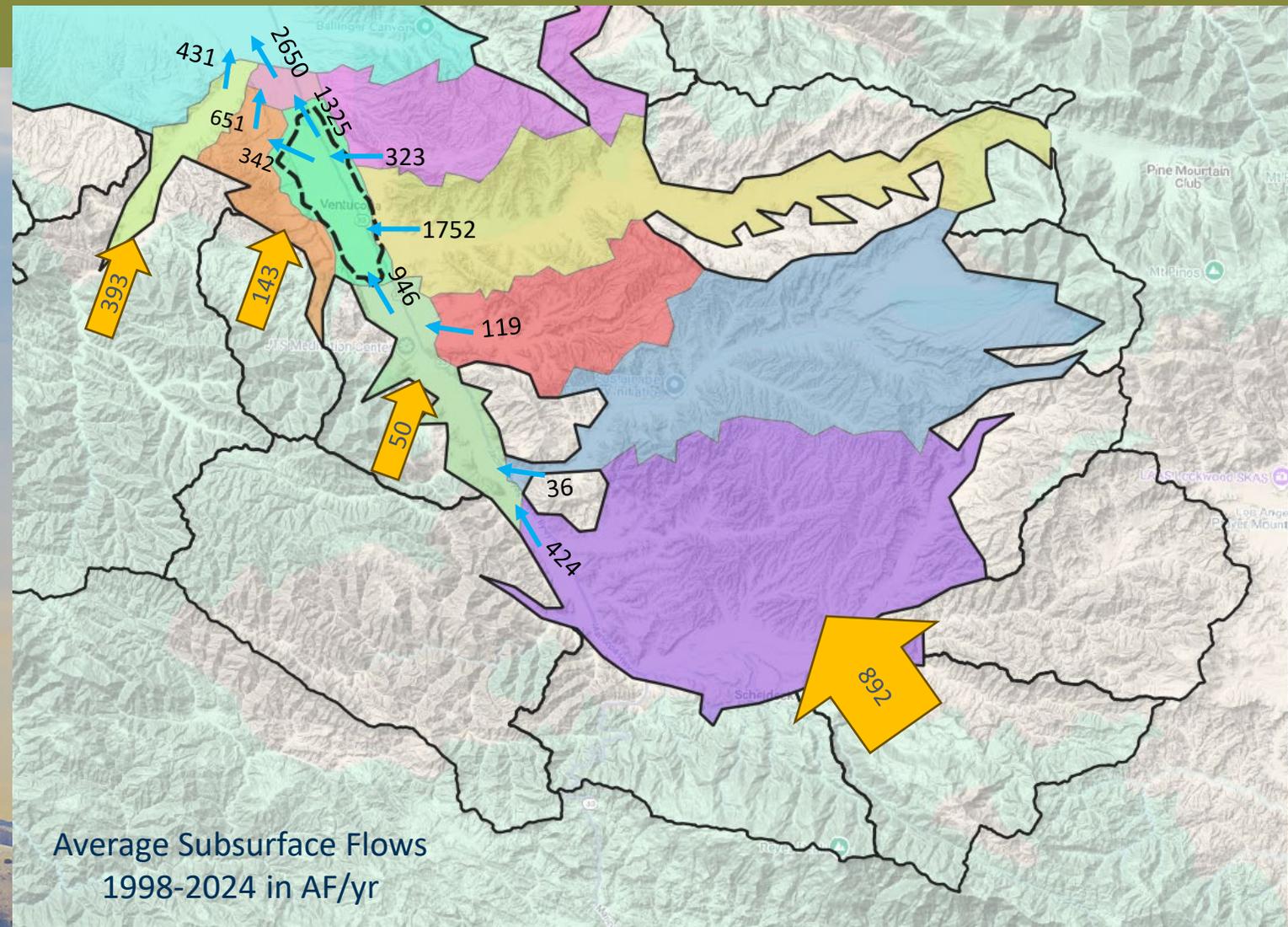
GW Budget for VMA (v0.31)



GW Budget for VMA (v0.31)

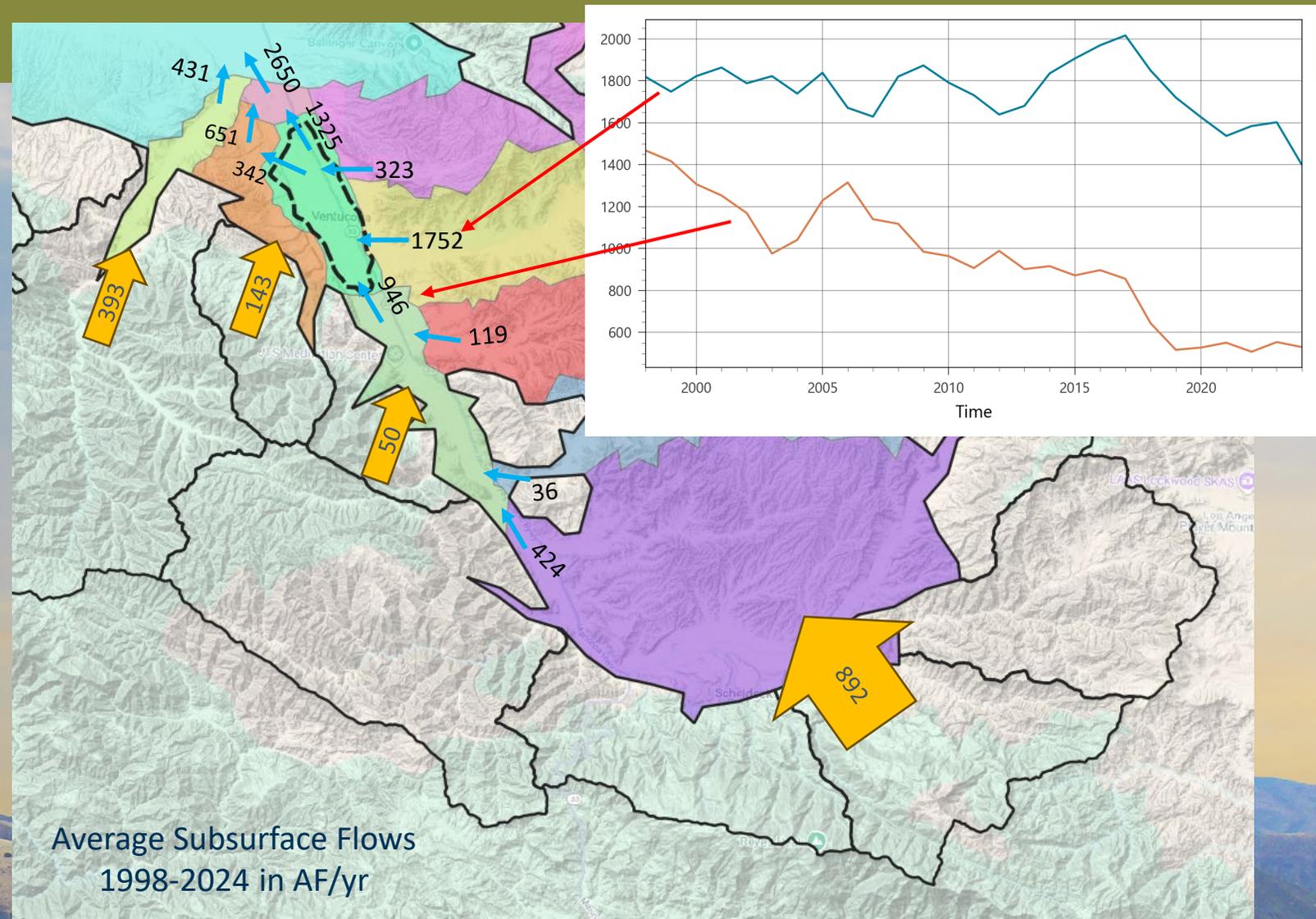


Subsurface Flows (v0.31)



-  Small Watershed Subflow
-  Subsurface Flow Inside Domain

Subsurface Flows (v0.31)



50 Small Watershed Subflow

1752 Subsurface Flow Inside Domain

Average Subsurface Flows
1998-2024 in AF/yr

Summary & Conclusion



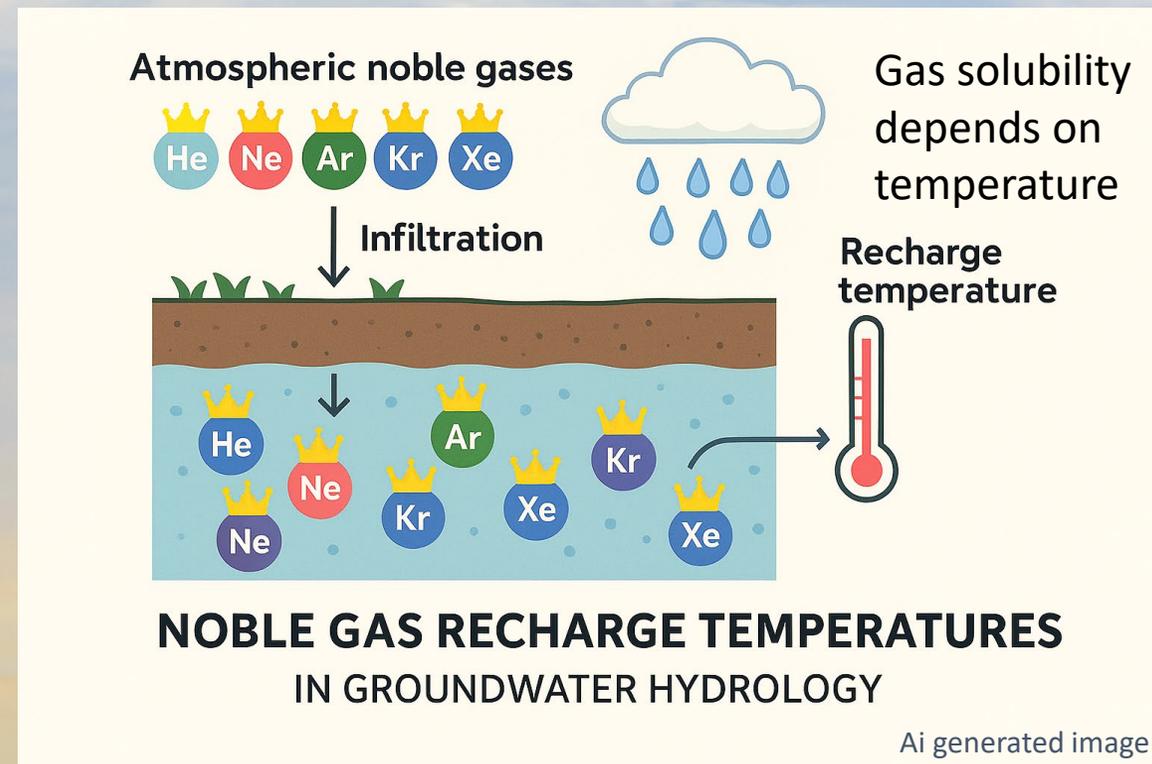
Summary

Streamflows and Foothill Watersheds

- Historical streamflow data upstream of Ventucopa is not extensive enough and/or sufficiently long for the records to be used as model input
- The Small Watersheds module of IWFM has limitations in simulating rainfall runoff and recharge conditions for the flashy watersheds of the area
- Proper simulation of streamflows conditions is necessary, as groundwater levels in wet years in the area are highly sensitive and responsive to the stream flows and associated recharge

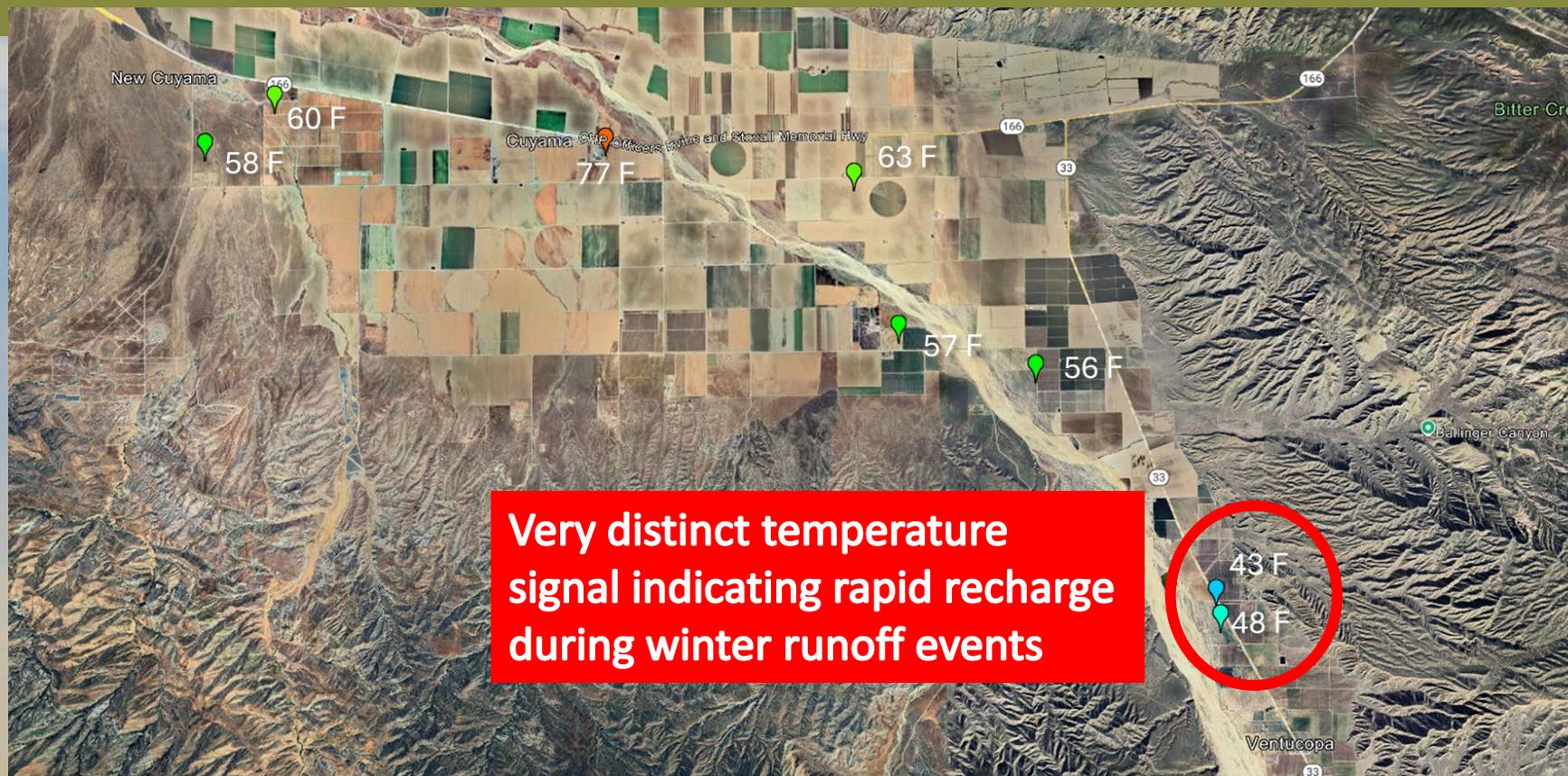
Noble Gas Recharge Temperatures - GAMA

- Noble gases are a group of chemical elements like helium, neon, argon, krypton, and xenon. They're found in the air we breathe and are chemically very stable — meaning they don't react much with other substances.
- When rainwater or surface water seeps into the ground to become groundwater, it traps some of these noble gases from the atmosphere. The amount of noble gases dissolved in the water depends on the temperature at the time the water entered the ground — this is called the recharge temperature.



Ate Visser, LLNL
[visser3 | people.llnl.gov](mailto:visser3@people.llnl.gov)

Noble Gas Recharge Temperatures - GAMA



Ate Visser, LLNL
[visser3 | people.llnl.gov](mailto:visser3@people.llnl.gov)

Summary

Simulated vs. Observed GWLs

- CBWRM can simulate general trends, seasonal fluctuations, and small recoveries in GWLs
- Over estimation in the downstream area and under estimation in the upstream area needs to be further adjusted and balanced
- The GWL recoveries in extreme wet years (e.g., 2023) need improvement

Summary

Pumping & Water Budgets

- Pumping volumes estimated by the CBWRM (v0.31) is generally close to the reported pumping rates. This gives confidence in ET and land use estimates
 - The land use, reported pumping, Well-APN Linkage in some service areas need to be verified
- Groundwater Budget from the CBWRM (v0.31) does not reflect the wet year recovery observed in the GWLs, potentially due to the inappropriate representation of stream recharge and/or small watersheds
- Subsurface inflow from Quatal Canyon and Ozena are major inflow components. Subsurface outflow to the Central Region is a major outflow component

Preliminary Recommendation

- CBWRM in its current state has limitations to adequately simulate the aquifer recovery observed in the wet years near Ventucopa
- Therefore, the 2ft/yr GWL decline contour estimated by CBWRM v0.30 Baseline may not be a good indicator of the long-term conditions and the sustainable yield near Ventucopa
- It is recommended to resolve the issues identified in this analysis before using CBWRM in the allocation calculations near Ventucopa Management Area

Preliminary Recommendation

- Areas for potential improvement:
 - Incorporate findings of the SBCF investigation into the model
 - Improved representation of the depth and extent of the fault,
 - Improved stratigraphy near the fault
 - Streamflows from the foothill areas and surrounding canyons draining to Cuyama River
 - Revise the SWS module parameters to better align the streamflow and subflow outputs OR
 - A independent Rainfall-Runoff model for the foothill areas with more comprehensive technical formulation of rainfall-recharge conditions is expected to better represent the historical streamflows and be used to improve the estimated Baseline conditions
 - Subsurface flows from Quatal Canyon and Ozena
 - An isotope study/geochemical analysis may help to quantify the subsurface inflows
 - Representation of the stream geometry
 - A hydraulic model using the LiDAR survey of the Cuyama River channel can help produce rating tables at the desired resolution
 - Recalibration of the CBWRM near and upstream of Ventucopa
 - Re-calibration of the Model for aquifer and streambed parameters upon completion of the above changes can improve model accuracy and long-term trend estimation for use in allocation process

Cuyama Basin Groundwater Sustainability Agency

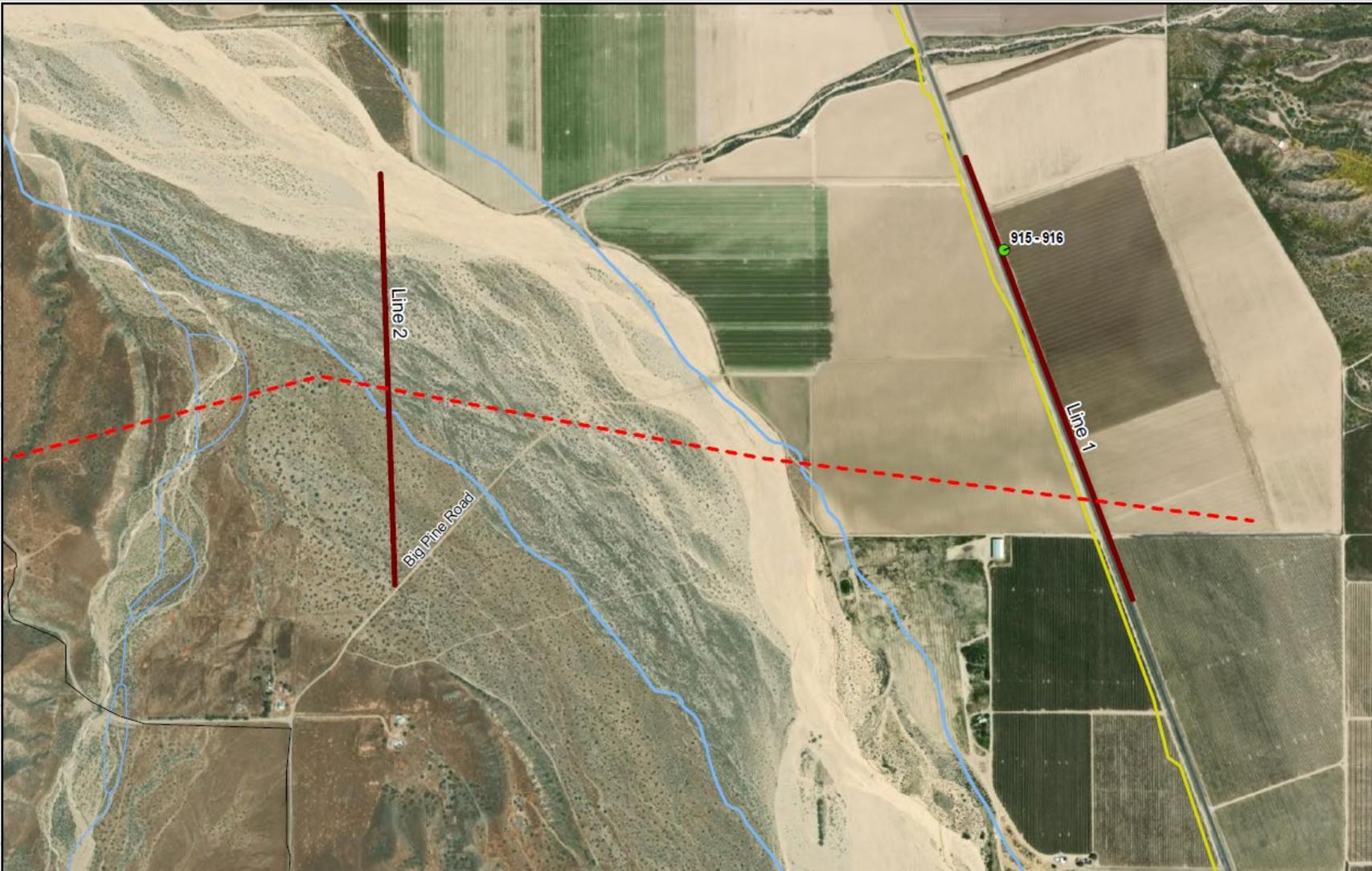
Update on Santa Barbara Canyon Fault Investigation

Brian Van Lienden

October 30, 2025



Summary of Geophysical Analysis in 2024 Investigation

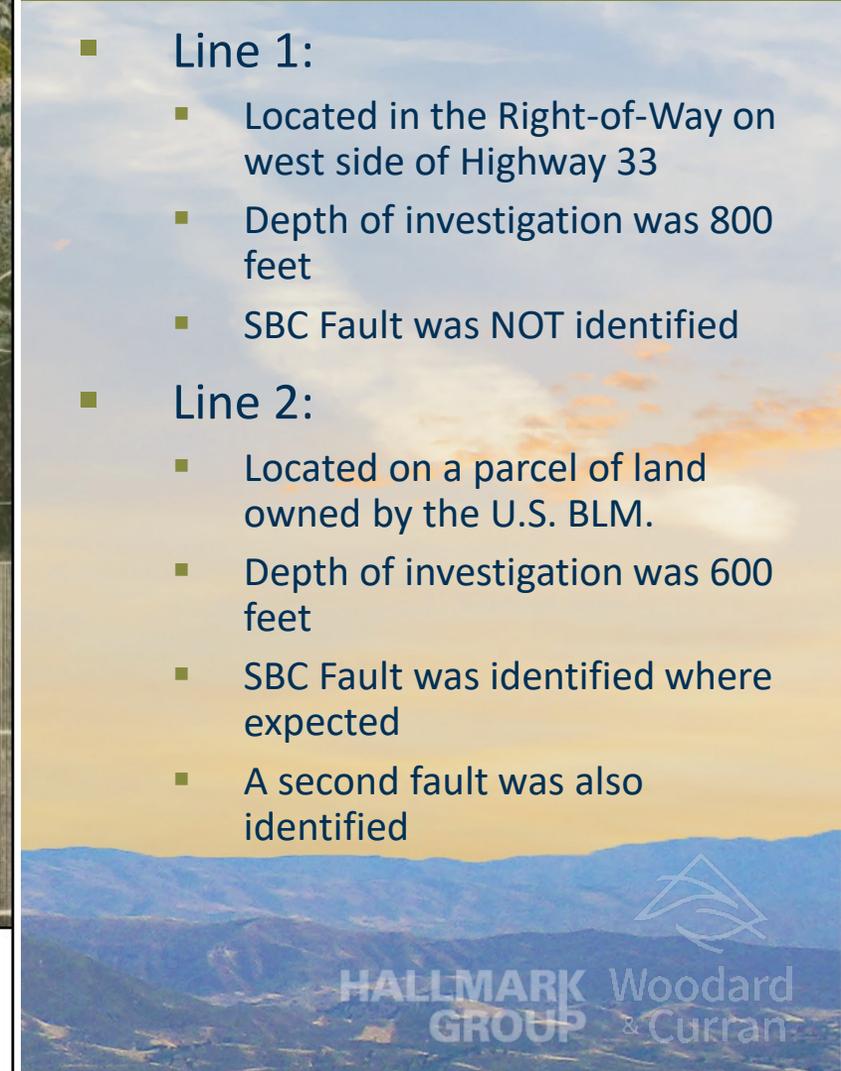


- **Line 1:**
 - Located in the Right-of-Way on west side of Highway 33
 - Depth of investigation was 800 feet
 - SBC Fault was NOT identified
- **Line 2:**
 - Located on a parcel of land owned by the U.S. BLM.
 - Depth of investigation was 600 feet
 - SBC Fault was identified where expected
 - A second fault was also identified

Figure 3-1: Santa Barbara Canyon Fault Transects

Legend

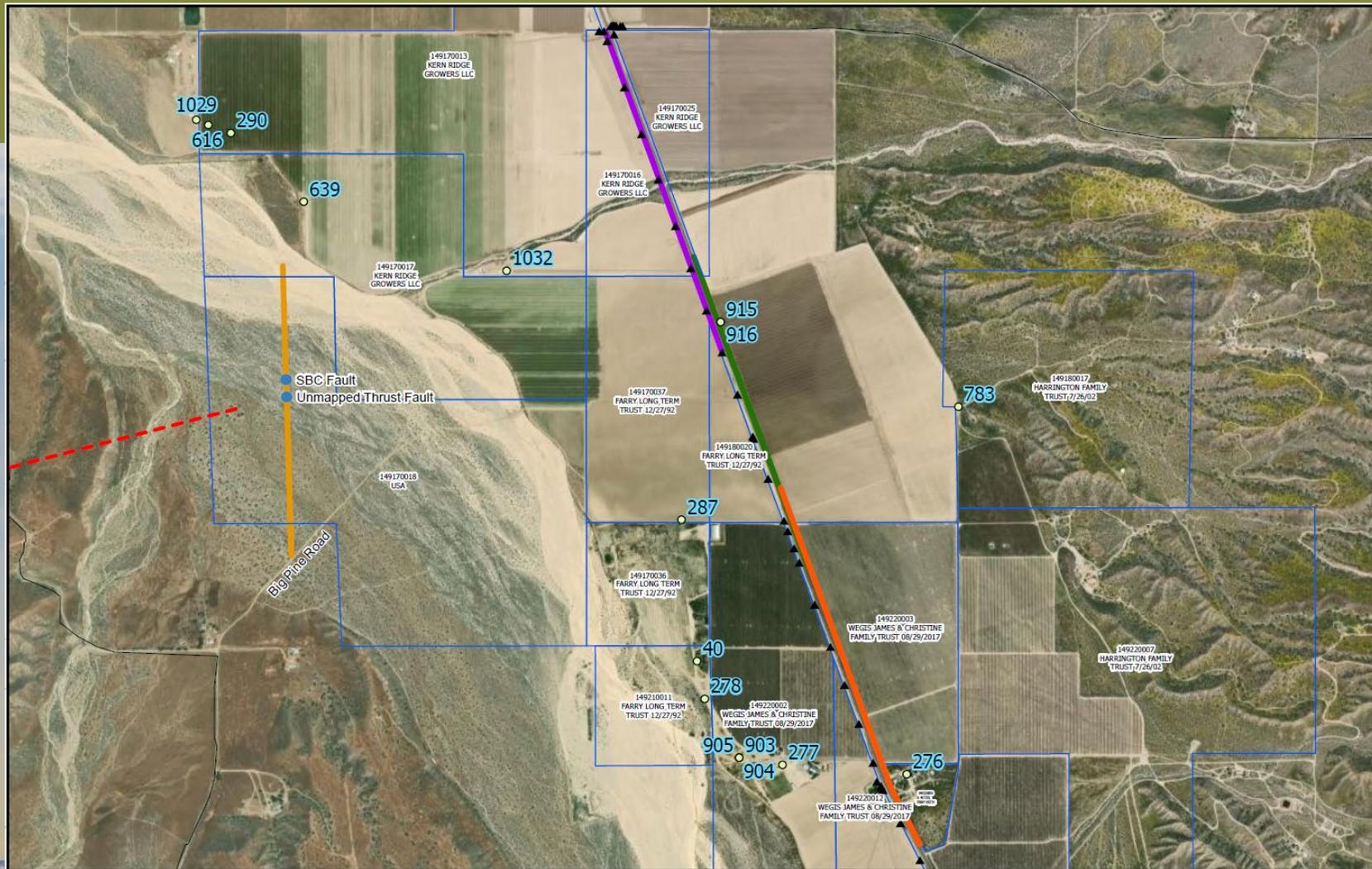
- Fault (Dashed where Inferred by USGS)
- Survey Transect
- Opti Monitoring Well
- Highway
- Local Road
- Creek
- Cuyama River
- Cuyama Basin



Schedule

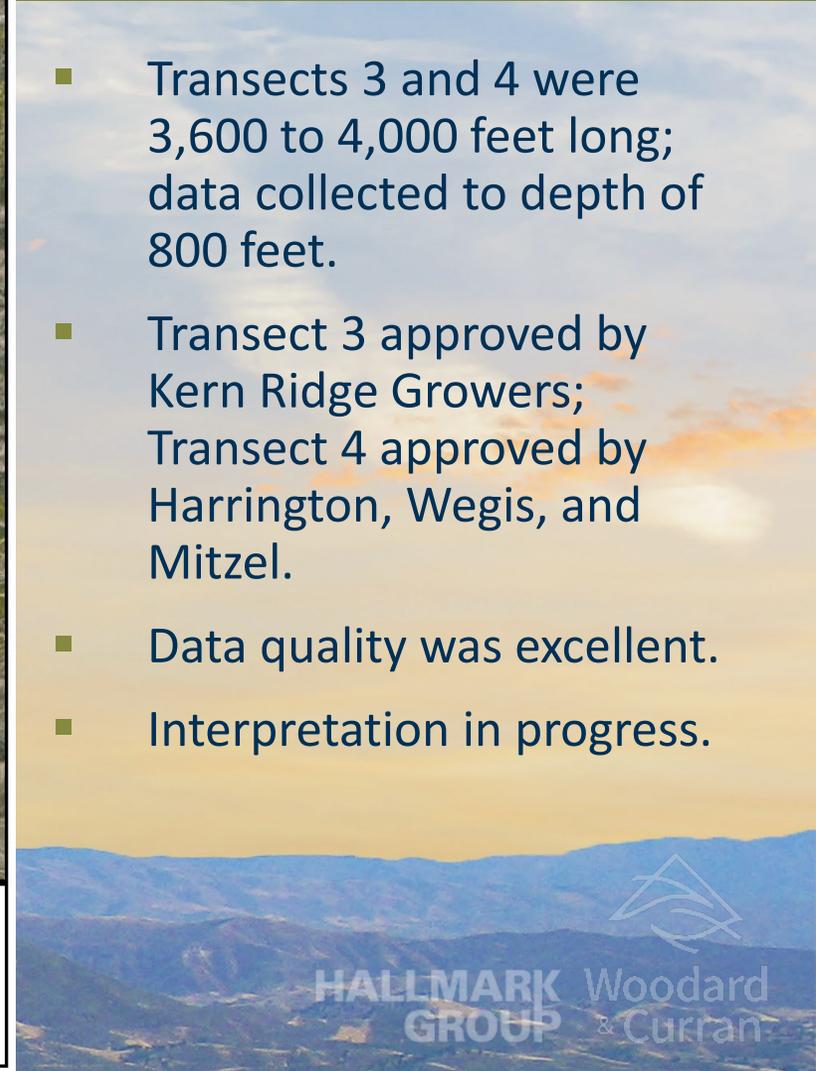
- August-September 2025 - outreach to stakeholders and field confirmation of transects.
- October 2025 – field investigation.
- October-November 2025 – data analysis by Spectrum Geophysics.
- December 2025 – Spectrum to provide draft report to W&C.
- January 2026 – revision of draft report.
- February 2026 – report to GSA.

Transects Performed for 2025 Investigation



- Transects 3 and 4 were 3,600 to 4,000 feet long; data collected to depth of 800 feet.
- Transect 3 approved by Kern Ridge Growers; Transect 4 approved by Harrington, Wegis, and Mitzel.
- Data quality was excellent.
- Interpretation in progress.

<p>Additional SBC Fault Transects</p> <p>Cuyama Basin Groundwater Fault Investigation</p>	<p>Legend</p>	<p>--- Fault (Dashed where Inferred by USGS)</p> <p>— Transect 1</p>	<p>— Transect 2 with Faults Identified</p> <p>— Transect 3 (3,600 ft)</p> <p>— Transect 4 (4,100 ft)</p>	<p>□ Parcel Boundaries</p> <p>▲ Telephone Pole</p> <p>○ Selected DMS Wells</p>	<p>Woodard & Curran</p> <p>CUYAMA BASIN GROUNDWATER SUSTAINABILITY CENTER</p> <p>Map Created: October 2025</p>
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TO: Standing Advisory Committee
Agenda Item No. 8b

FROM: Taylor Blakslee

DATE: October 30, 2025

SUBJECT: Discuss and Take Appropriate Action on Tri-County Pistachio Variance Request

Recommended Motion

SAC and Board feedback requested.

Discussion

On July 24, 2025, the Board received a variance request letter from Tristan Zannon, which included a request to adjust the 2025-2029 base allocation from 426 AFY to 611 AFY, reflecting a 5-6% annual reduction consistent with other CMA landowners. The letter was included as a correspondence item during the September 3, 2025 Board meeting, and is provided as **Attachment 2**.

A historical land use data analysis was conducted to verify the claims of potential data discrepancies and presented findings to the Variance Ad hoc (Directors Albano, Jackson, Young) on October 23, 2025.

The findings from the historical land use data analysis, along with a recommendation from the Variance Request ad hoc are summarized in **Attachment 1**.

Cuyama Basin Groundwater Sustainability Agency

Discuss and Take Appropriate Action on Tri-County Pistachio Variance Request Taylor Blakslee / Sercan Ceyhan



Purpose / Background

- Tri-County Pistachio submitted a Variance Request on July 24, 2025.
 - The request includes an adjustment to the 2025-2029 base allocation from 426 AFY to 611 AFY, reflecting a 5-6% annual reduction consistent with other CMA landowners.
- On September 5, 2025, Tristan Zannon had provided his variance request as correspondence for the board meeting.
 - During the agenda item, the board requested that it be agendized for the November board meeting.
- Claimed Errors
 - Low pumping values in 2014-2015 for APN 149-170-042, which the landowner asserts are impossible for a 40-acre mature pistachio orchard.
 - Irrigation during planting and growth years (2002-2006) not reflected in model.

Context – Area of Variance Request



For clarity, the parcels will be abbreviated to the last three numbers of the APN (042, 044, 045, 046)

Parcel 149-170-044 has two fields, referred by Zannon as East and West (044 East, 044 West)

Historical Land Use Summary

Parcel APN	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
149-170-046	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist	Pist						
149-170-045	Pist	Pist	Pist	Pist	idle	idle	+ idle	idle	idle	idle	Pist																	
149-170-042	Pist	Pist	Pist	Pist	idle	idle	idle	idle	idle	+ idle	Pist	idle	idle	Pist														
149-170-044 West	Pist	Pist	Pist	Pist	idle	idle	idle	+ idle	idle	idle	Pist																	
149-170-044 East	Pist	Pist	Pist	Pist	idle	idle	idle	idle	+ idle	idle	Pist																	

Should have been identified as idle, was identified as Pistachio instead

Should have been identified as Pistachio, was identified as idle instead.

Potential Impact on Allocations – Average Use

Assuming fully grown conditions from a historical year

Original	APN	WY1998	WY1999	WY2000	WY2002	WY2003	WY2004	WY2005	WY2006	WY2014	WY2015
	149-170-042	57.19	64.05	1.51	1.49	1.31	1.46	1.97 ⁺	99.66	4.69	3.21
	149-170-044	119.47	131.38	2.29	1.65	1.91 ⁺	1.53 ⁺	2.43	195.90	293.91	266.88
	149-170-045	60.41	65.87	4.12	2.93 ⁺	2.75	2.87	4.22	108.31	147.50	133.65
	149-170-046	50.04	54.52	57.94	78.29	64.83	80.89	82.47	81.17	117.75	107.37
<i>Red = Incorrect assignment of pistachios or idle</i>											
Adjusted	APN	WY1998	WY1999	WY2000	WY2002	WY2003	WY2004	WY2005	WY2006	WY2014	WY2015
	149-170-042	1.51	1.51	1.51	1.49	1.31	1.46	99.66	99.66	116.44	116.44
	149-170-044	2.29	2.29	2.29	1.65	97.95	195.90	195.90	195.90	293.91	266.88
	149-170-045	4.12	4.12	4.12	108.31	108.31	108.31	108.31	108.31	147.50	133.65
	149-170-046	50.04	54.52	57.94	78.29	64.83	80.89	82.47	81.17	117.75	107.37

Green=Water use estimate decreased. Blue=Water use estimate increased

Corrections Applied:

- 1998 to 2005: Updated water use estimates based upon initial planting dates provided by Tri-County Pistachio
- 2014 & 2015: Updated water use estimates assuming pistachios in Parcel 042

Potential Impact on Allocations – Average Water Use with assumed changes in the historical cropping

Water Use Estimate	Original	Adjusted
APN	1998-2017	1998-2017
149-170-042	63.44	73.66
149-170-044	156.28	168.16
149-170-045	81.86	96.98
149-170-046	84.69	84.69
Total	386.27	423.49

9.6% increase

Potential Adjustment in Tri-County Pistachio Allocations

- The following shows the change in Tri-County Pistachio's allocations with a 9.6% increase in their historical use.
- The adjustments were made assuming that no other landowner's allocations would be changed.

Tri-County Pistachio Allocations	2025	2026	2027	2028	2029
Original	426.06	319.86	302.67	285.47	268.28
Adjusted	467.12	350.68	331.84	312.98	294.13
Difference	41.06	30.82	29.17	27.51	25.85

Ad Hoc Recommendation

- Correct land use data for Tri-County parcels for the following years:
 - 1998-1999
 - 2002-2006
 - 2014-2015
- Adjust only Tri-County allocation for years 2025-2029 (no adjustment to other CMA landowner allocations).

Ad-hoc considers this as an error correction, not a variance request.

Brownstein

Brownstein Hyatt Farber Schreck, LLP

805.963.7000 main
1021 Anacapa Street, 2nd Floor
Santa Barbara, California 93101

July 24, 2025

Amy Steinfeld
Attorney at Law
805.882.1409 direct
asteinfeld@bhfs.com

VIA EMAIL

Taylor Blakslee
tblakslee@hgcpm.com
Assistant Executive Director
Cuyama Basin Groundwater Sustainability Agency
4900 California Avenue
Tower B, Suite 210
Bakersfield, CA 93309

Re: Variance Request- Tri-County Pistachio

Dear Mr. Blakslee:

On behalf of our client, Tri-County Pistachio (“Tri-County”), we submit this variance request for consideration by the Board of Directors of the Cuyama Basin Groundwater Sustainability Agency (“CBGSA”) in response to the CBGSA “Notice of Final Central Management Area Allocations for 2025-2029 (5 Years),” dated February 7, 2025. Tri-County was only recently included in the Central Management Area (“CMA”) when CBGSA updated the CMA boundary in 2024. In addition to the specific objections presented herein, Tri-County incorporates general objections to CBGSA’s allocation policy that our office previously submitted on behalf of clients within the CMA. (Letter from Stephanie Hastings to CBGSA dated March 6, 2023 is attached as **Exhibit A.**)

It recently came to Tri-County’s attention that the CBGSA relied on incorrect technical data to calculate Tri-County’s 2025-2029 base allocation of 426 acre feet per year (“afy”) for APNs 149-170-042, 44, 45 and 46. Tri-County is an established pistachio grower in the Cuyama Valley that has invested millions of dollars into this region, and will suffer great economic loss if it is unable to obtain an adjusted base groundwater allocation of 611 acre feet (“af”) for 2025 with subsequent annual reductions consistent with CBGSA’s glide path ramp down of 5-6 percent per year in the Central Management Area (“CMA”). If the erroneous base allocation remains in place, unlike the other farmers in the CMA, Tri-County will suffer an immediate 32 percent reduction in available groundwater this year—its first year being included within the CMA allocation program. A sudden, drastic reduction of 32 percent is unfair and must be corrected.

Taylor Blakslee
 Assistant Executive Director
 Cuyama Basin Groundwater Sustainability Agency
 July 24, 2025
 Page 2

Thus, we are writing to request that Tri-County's base allocation be adjusted from 426 af to 611 af, which is a 5 percent reduction from Tri-County's 2024 water use of 644 af and comports with the CBGSA's reasonable glide path ramp down of 5-6 percent per year for all other CMA farmers. This letter provides additional background information to support the requested variance.

Tri-County's parcels were determined to be within the CMA for the first time in 2024 when the GSA adopted an updated CMA boundary. Consequently, Tri-County did not have the same opportunity to identify issues with the technical information it submitted and to correct its allocation compared to other landowners within the original CMA boundary. Tri-County should be given an opportunity now to report its corrected and true historical pumping to CBGSA and obtain a variance in its base allocation as a matter of equity.

Upon reviewing its final allocation, Tri-County realized that the CBGSA incorrectly calculated Tri-County's historical water use in certain years. These accounting errors contributed to Tri-County's incorrect base allocation calculation. In 2005, Tri-County planted 40 acres of pistachios on APN 149-170-42. Unlike row crops which can be fallowed, pistachios are perennial crops and need water every year. According to the CBGSA, Tri-County's historical water use associated with 149-170-42 is as follows between 2004-2017:

Year	CBGSA Water Use Estimate (in afy)
2004	1.46
2005	1.97
2006	99.66
2007	101.63
2008	111.17
2009	116.34
2010	119.38
2011	108.49
2012	131.58
2013	121.63
2014	4.69
2015	3.21
2016	111.24
2017	109.30

Taylor Blakslee
 Assistant Executive Director
 Cuyama Basin Groundwater Sustainability Agency
 July 24, 2025
 Page 3

The historical water use estimate to irrigate 40 acres of pistachio trees in 2014 and 2015 (highlighted above) is obviously an error. Tri-County did not remove any trees from production during 2014 and 2015 and there was no drop off in the number or quality of nuts harvested from that parcel. A significant drop in nut quality and quantity would have occurred if the trees had received little to no water during the 2014-2015 growing season. Such a drastic reduction in water use would have been catastrophic or even fatal to the trees. No such event occurred during these years.

In 2024, Tri-County reported total metered water use of 626 af collectively used on APNs 149-170-042, -045, -044, and -046. Although Tri-County’ wells were not metered in 2014 and 2015, the 2024 total metered water use of 626 af can be used to estimate the corrected water use in 2014 and 2015 on APN 149-170-042.

For example, in 2014 we can subtract from 626 af the 2014 CBGSA estimated water use for the other Tri-County parcels (147.50 af + 293.91 af +117.75 af = 559.16 af) to find the approximate corrected water use for APN 149-170-042. Using this methodology, the corrected water use for APN 149-170-042 should be approximately 66.84 af in 2014 (626-559.16= 66.84) and 118.1 af in 2015 (626-507.9= 118.1).

In other instances, the CBGSA model does not account for the history of Tri-County water use during the multi-year growth phase as the trees reached full maturity. Instead, CBGSA’s model estimates that water was only used once trees reached full productive maturity. This is incorrect and does not reflect the realities of the water requirements for pistachio orchards.

Year	APN 149-170-45 (CBGSA Water Use Estimate in afy)	APN 149-170-44 (CBGSA Water Use Estimate in afy)	APN 149-170-42 (CBGSA Water Use Estimate in afy)
2002	2.93 (40 acres of pistachios planted in 2002.)	1.65	1.49
2003	2.75	1.91 (40 acres of pistachios planted in 2003.)	1.31
2004	2.87	1.53 (Another 40 acres of pistachios planted in 2004 for a total of 80 acres of pistachios on the parcel.)	1.46
2005	4.22	2.43	1.97 (40 acres of pistachios planted in 2005.)
2006	108.31	195.90	99.66

Taylor Blakslee
 Assistant Executive Director
 Cuyama Basin Groundwater Sustainability Agency
 July 24, 2025
 Page 4

2007	108.28	205.56	101.63
2008	118.75	228.24	111.17

CBGSA’s model used to calculate allocations completely omits Tri-County’s history of water use during the multi-year growth phase as the trees reached full maturity. Instead, the CBGSA only accounts for fully mature trees on Tri-County’s parcels starting in 2006, without concessions for the water applied when the trees were initially planted and thereafter to irrigate the trees between 2002-2006 to bring them to maturity.

Tri-County planted 40 acres of pistachios on APN 149-170-45 in 2002, 40 acres on APN 149-170-44 in 2003, another 40 acres on APN 149-170-44 in 2004, and 40 acres on APN 149-170-42 in 2005. A copy of Google Earth images from 2002-2005 (with 1994 included as a control to show the fields prior to planting) evidence the Tri-County pistachio planting dates and is attached as **Exhibit B**.

The CBGSA provided growers with a water use estimate worksheet that provided instructions for how growers could estimate net water use based on acreage and crop factors as calculated by the California Polytechnic State University’s Irrigation Training and Research Center (“ITRC”) California Crop and Soil Evapotranspiration Report, ITRC Report No. 03-001. (See blank CBGSA Form I Irrigator Water Use Estimate Worksheet, **Exhibit C**.) According to the CBGSA’s own provided formula, 40 acres of pistachios would result in total net water use of approximately 119.6 afy. (40 acres x 2.99-Pistachio crop factor using ET Reference Average for Zone 10 = 119.6 afy.) Even accounting for a lower than average water use as the trees were still maturing during the initial planting phase, we would expect to see a gradual increase in water use as the trees reach maturity. Instead, CBGSA’s model represented above seems to erroneously suggest that Tri-County planted fully mature pistachio trees in 2006. This is not physically or economically feasible and does not reflect the realities of Tri-County’s operation. (See **Exhibit B**.)

The highlighted figures in the chart above represent the erroneous water use estimates that must be adjusted for purposes of calculating Tri-County’s base allocation. CBGSA’s model and the erroneous base allocation based on this model should be adjusted to account for Tri-County’s water applied to irrigate trees between 2002-2006 to bring them to maturity.

Further, Tri-County was only included in the CMA boundary in 2024 and was not given a sufficient opportunity to scrutinize the technical data, or to purchase water before having severe cutbacks imposed on them. On May 3, 2023, the CBGSA approved the final 2023 and 2024 CMA groundwater allocations for those properties within the original CMA boundary. Those initial allocations were only effective for one year, then were adjusted and reconsidered for the five year period between 2005 to 2029. During this time, those landowners within the original CMA boundary had a full year to adjust to

Taylor Blakslee
Assistant Executive Director
Cuyama Basin Groundwater Sustainability Agency
July 24, 2025
Page 5

the new groundwater allocations and to determine whether there were any issues with the technical information relied upon by the CBGSA in calculating allocations.

On September 4, 2024, the CBGSA Board considered and adopted a new CMA boundary based on an updated basin model. Overnight, Tri-County was included in the newly adopted CMA boundary line and became subject to the CMA groundwater allocations for the first time.

On November 8, 2024, CBGSA distributed a “Notice of Updated Central Management Area 2025-2029 Groundwater Allocations and Variance Request Form” which informed affected parties, including Tri-County, that allocations were calculated based, in part, on cropping data, including landowner provided data and Land IQ/DWR estimated data. The notice set a short deadline of December 6, 2024 to submit a completed Variance Request Form.

Tri-County had less than one month to evaluate the effects of a groundwater allocation that would be imposed for the next five years and to scrutinize the data used by CBGSA to calculate the allocations, in contrast to the original landowners who had the opportunity to attend numerous CBGSA hearings on the subject, were granted multiple opportunities to correct mistakes and who had ample time to adjust to the CMA groundwater allocations during the 2023-24 water year. On February 7, 2025, CBGSA distributed a “Notice of Final Central Management Area Allocations for 2025-2029 (5 Years).” The short time frame was insufficient for Tri-County to gather, submit, and review its pumping data.

Unless this error is fixed, Tri-County faces the prospect that it may have to immediately remove its some of its productive trees. Without a water market in place in the Cuyama Valley, perennial crops, like pistachios, face a major disadvantage. Tri-County has invested millions of dollars in its orchards and has waited for years for its pistachio trees to reach full economic maturity. This investment is now at risk because of accounting errors by the CBGSA. Unlike farmers who cultivate annual crops and can fallow ground, Tri-County’s pistachio trees require a base quantity of irrigation water to survive.

For the foregoing reasons, Tri-County respectfully requests that the CBGSA correct the technical data for Tri-County’s affected property and grant a variance (correction) to its current 2025-29 CMA allocation from 426 af to **611 af**. This represents a 5 percent reduction from 2024 water use, consistent with CBGSA’s glide path ramp down of 5-6 percent per year.

Please contact me with any questions. We appreciate your time and attention to this matter.

Sincerely,


Amy Steinfeld

EXHIBIT A

March 6, 2023

Stephanie Osler Hastings
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VIA EMAIL TO: TBLAKSLEE@HGCPM.COM

Taylor Blakslee
Project Manager
Cuyama Basin Groundwater Sustainability Agency
4900 California Ave,
Tower B, Suite 210,
Bakersfield, CA 93309

RE: Objection to Cuyama Basin Central Management Area Revised Allocation (Revised)

Dear Mr. Blakslee:

On behalf of our clients with lands within the Central Management Area (CMA),¹ we submit the following objection to the Cuyama Basin Groundwater Sustainability Agency's (CBGSA) proposed Notice of Central Management Area Policies and Landowner Requirements, dated February 3, 2023 (Notice), and the "revised estimated allocations" and "pumping reduction program" for 2023 and 2024 set forth in the Notice (CMA Allocation Policy). Our firm represents a number of landowners within the Cuyama Basin including landowners inside and outside of the CMA.

As described herein, our clients continue have significant concerns with the GSA's Notice and the CMA Allocation Policy—most importantly, that the GSA's CMA Allocation Policy has the potential to impair common law water rights without due process of law—and therefore submit these comments for the Board's consideration. These comments further supplement our prior objections and comments provided to the CBGSA on January 6, 2023 related to the Overarching Policy for Wells Inside and Outside the Central Management Area (Farm Unit Policy) and on September 1, 2022 related to the prior CMA Allocation Policy. This constitutes a general objection to the CMA Allocation Policy and the CBGSA's iterative variance request process and does not propose a specific variance request for any individual client.

¹ Our clients in the CMA include Blue Sky Sustainable Living Center, Perkins Ranch (aka Belden Family Trust), Ann M. Buck Trust, Eight Ls Trust, Jason and Mary Jo Harrington Revocable Living Trust, David Lewis, Slumskie Family Trust and Trujillo Family Trust.

I. Reservation of Rights

Our clients reserves all rights, claims and defenses with respect to the CMA Allocation Policy, the Farm Unity Policy, and any other action of the CBGSA. Our clients reserve the right to object to and challenge the CMA Allocation Policy, the Farm Unit Policy, and any other action by the GSA, administratively before the CBGSA, or through any other legal means, including through the pending comprehensive adjudication of the Cuyama Basin (*Bolthouse Land Company, LLC, et al. v. All Persons Claiming a Right to Extract Groundwater in the Cuyama Valley Groundwater Basin (No. 3-013)*) (the “Adjudication”). Our clients’ participation in this process in no way constitutes a waiver of their objections or an admission, opinion or support for the CBGSA’s actions related to the CMA Allocation Policy, the Farm Unit Policy, or and any other action of the CBGSA.

II. The CMA Allocation Policy Conflicts with California Water Law

The GSA does not have the power to determine or alter groundwater rights. SGMA does not supplant the common law; rather it only supplements it. Yet, the Notice purports to limit the pumping of a subset of the Cuyama Basin’s users without regard to any user’s common law water rights.

For example, the CMA Allocation Policy is geographically discriminatory in that it constrains the pumping of a subset of overlying landowners within the CMA, even though all groundwater users share in a common groundwater resource. Regardless of whether a landowner is inside or outside the CMA, their pumping withdraws from the same supply. The CMA Allocation Policy ignores this fact and California groundwater law by regulating groundwater use by some, but not all. This approach is inconsistent with the physically interconnected nature of the Basin and with common law water rights.

The Farm Unit Policy further creates new inequities based solely upon the nature of a requester or landowner’s operations that are completely unrelated to sustainable management of the groundwater resource. For example, a landowner that owns 50 acres of land inside the CMA and 50 acres of land outside the CMA and pumps 100 acre-feet per year (“AFY”) from a well outside the CMA for use on the entire property is subject to the Farm Unit Policy and must comply with the CMA Allocation Policy’s pumping reductions. Meanwhile, a neighbor that owns 50 acres of land outside the CMA that pumps 150 AFY from a well outside the CMA is not subject to CMA Allocation Policy under the Farm Unit Policy and need not engage in any pumping reductions. In fact, the neighbor could increase its water use above and beyond any pumping reductions by those subject to the Farm Unit Policy. As such, the Farm Unit Policy arbitrarily impairs exercise of overlying rights in a manner that is disconnected from sustainable management of the resource.

Moreover, in implementing SGMA, even area-specific responsive management actions must be specifically associated with avoiding undesirable results identified in the Cuyama Basin Groundwater Sustainability Plan (GSP). Notably, the Department of Water Resources issued a statement on March 2, 2023 stating that it plans to recommend further corrective actions that the CBGSA must include in its January 2025 GSP Update. Such corrective actions may implicate the CMA Allocation Policy and

Farm Unit Policy and should be considered during the adoption of the CMA Allocation Policy given that they may impact implementation of Basin-wide sustainable management.

While an allocation policy is one means of ensuring sustainable groundwater management, such a policy must comport to fundamental principles of California Water Law—i.e., that the burdens of sustainable management are shared amongst similarly situated water right holders—while simultaneously avoiding the undesirable results on the Cuyama Basin.

III. The CMA Allocation Policy Should be Reconciled with the Ongoing Cuyama Basin Comprehensive Groundwater Adjudication

The Adjudication seeks to quantify all groundwater rights within the Cuyama Basin consistent with California water law. The Court—not the GSA—has exclusive jurisdiction to determine water rights through the Adjudication and to allocate the Cuyama Basin’s sustainable yield accordingly. The CMA Allocation Policy and Farm Unit Policy, which effectively quantify a subset of groundwater users’ water rights, conflict with the Adjudication because they seek to quantify and impair the rights of only a portion of the Cuyama Basin’s users. Ultimately, the Court’s decision with respect to water rights and a physical solution in the Adjudication will supersede the CMA Allocation Policy and the Farm Unit Policy.

Through the Adjudication, the Court will craft a physical solution to sustainably manage the Cuyama Basin. This physical solution should resolve the fundamental concerns with the CMA Allocation Policy and the Farm Unit Policy identified in this letter. Accordingly, the GSA should consider other approaches to improve sustainable groundwater management in the interim while the Adjudication unfolds and, at a minimum, revise the CMA Allocation Policy and the Farm Unit Policy to conform with the pending Adjudication.

IV. The CMA Allocation Policy Unclear and Fails to Acknowledge Uncertainties

Numerous components of the CMA Allocation lack evidentiary support and therefore are arbitrary and unclear. For example:

The GSA has acknowledged the modeled and operational CMA boundary is arbitrary given that users within the CMA pump groundwater from the same aquifer as users outside of the CMA who are exempt from the program. At the CBGSA Public Workshop on August 25, 2022, staff acknowledged that the CMA boundary was selected for political reasons and had no scientific basis. The CMA boundary also may no longer reflect current Basin groundwater levels following the significant storm events that may raise groundwater levels. Given that the CMA boundary is based, in part, by groundwater level information, the CBGSA must update the model to reflect current Basin conditions to define the boundary prior to imposing a punitive allocation program on a subset of landowners.

Further, the CMA boundary was selected using Cuyama Basin Water Resources Model (CBWRM) results that have a margin of error based on model limitations and geographic projections that

significant impact CMA Allocation Policy implementation but remain unexplained and unquantified. The model uncertainty undoubtedly impact the allocations assigned to water users yet it is unclear how, if at all, this uncertainty is accounted for in the individual allocations.

During the prior variance request process, we identified a flaw in the CBGSA's allocation methodology. Although the CBGSA addressed the identified error, it continues to rely on land use data from 1998-2021, including both landowner provided data and aerial survey data, imported into the CBWRM to estimate groundwater use in a manner that cannot be reproduced and verified by landowners. The Notice contains a description of the revised methodology but again it is not clear about the basis of the selected water use period and whether it accurately reflects historical and/or planned for pumping. Moreover, the CBGSA's characterization of the variance request process provides limited opportunities to correct the CBWRM data.

The CBWRM data further does not consider land use and irrigation efficiency practices in setting the pumping within the CMA and estimate individual allocations. The CMA Allocation Policy relies on a 20-year period (1998-2017) to calculate the individual allocations. In effect, this 20-year period takes into account historical, less-efficient irrigation practices. It also penalizes landowners who voluntarily employed significant conservation measures to limit their water use or fallowed lands. Landowners that may have temporarily modified their groundwater production to convert to more water efficient uses may also be penalized. None of this information is evident from the CMA Allocation Policy and should be considered through the policy and variance request process.

V. The Variance Request Process Is Flawed

First, the Notice does not set forth clear criteria or findings that the Board will use to determine whether to grant a variance, which may lead to arbitrary and capricious decision-making. This continues the same flawed process that the CBGSA took with the first iteration of variance requests. Further, since the variance request process will impact other landowners' allocations, even those that do not submit a variance request, the process must have clear criteria to provide adequate notice and clear procedures for all landowners.

Second, the Notice does not provide the data upon which the proposed allocations are based in a transparent manner that would allow for landowners to ascertain data errors as needed to submit a variance request form. The data tables attached to the Notice fail to provide landowners with any information as to the modeled calculation of an individual allocation such that a landowner can understand the potential source of data errors. Further, the CBWRM data is generally not available to digestible for individual landowners.

Third, the Notice does not make it clear to landowners that do not intend to submit a variance request form that their individual allocations may change in response to the Board's action to grant a variance

requested by another landowner. All landowners should be fully informed of the need and right to participate in the variance process in order to preserve their rights and avoid penalties.

Fourth, the California Constitution and SGMA contain specific substantive and procedural requirements on the adoption of fees and charges. The Cuyama GSA has not complied with any of these requirements in its adoption of a \$250 fee to submit a Variance Request Form.

VI. The CMA Allocation Policy Should Have Been Adopted Through A Formal Action And Was Not

The CBGSA has developed the current form of the CMA Allocation Policy through a series of minute orders over many months of CBGSA Board meetings. The CBGSA Board, however, has never taken formal action to adopt the CMA Allocation Policy, the Farm Unit Policy or any components thereof through a formal ordinance to establish this regulatory program.

Because the CMA Allocation Policy is clearly intended as a regulation, a formal document is needed to explain and elucidate the program and its requirements. Although titled “Central Management Area Policies and Landowner Requirements,” the Notice and estimated allocation assigned to certain Basin landowners has the effect of a regulation that limits groundwater pumping by a subset of the Basin’s landowners without due process and in conflict each landowner’s exercise of its overlying property right in the Basin. The Notice also proposes to impose monetary and other penalties on those listed landowners who use groundwater in excess of the assigned estimated allocation. As such, the CMA Allocation Policy must be adopted through a formal ordinance that imposes specific regulations (allocations) and penalties for failure to comply with such regulations on landowners within the CMA to ensure that affected landowners receive due process.

An ordinance also is necessary to clearly document and allow for public comment on the mechanics of the program’s requirements to allow for meaningful public participation and informed decision-making. Notably, the CBGSA Board still plans at least two actions which may further impact landowners rights and obligations under the CMA Allocation Policy: (1) action on the second iteration of variance requests at a March 29, 2023 special meeting; and (2) the “final adoption” at the May 3, 2023 meeting. These actions may further modify landowners allocations or the regulatory requirements of the CMA Allocation Policy. Absent a clear ordinance establishing the regulatory program described in the CMA Allocation Policy, landowners have no way to knowing whether to object to their current allocations or the program itself—a clear violation of due process.

Taylor Blakslee
March 3, 2023
Page 6

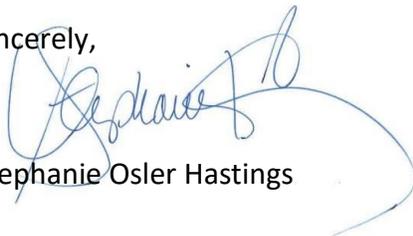
VII. The CBGSA Has Not Yet Complied with the California Environmental Quality Act

The CBGSA's actions are subject to the California Environmental Quality Act (CEQA). As discussed above, the CBGSA has asserted that the Notice and CMA Allocation Policy is a result of a series of directions proved over many months and CBGSA Board meetings by minute order. CEQA must be completed at the "earliest commitment" to a project or to a definite course of action. As such, the CBGSA's compliance with CEQA is long overdue.

Assuming that the Board has not taken a formal action to adopt the CMA Allocation Policy, the Board must consider whether the CMA Allocation Policy will have a direct or reasonably foreseeable indirect impact on the environment due to the potential for landowners to need to fallow land to comply with the program. The fallowing of land in response to the proposed allocation has reasonable foreseeable direct and indirect impacts on the environment including but not limited to impacts on air quality, land use, agricultural resources, and biological resources.

Thank you for your considerations of these comments. We also request that these comments be included in the CBGSA Board materials for its March 29, 2023 and May 3, 2023 meetings. Should you have questions, please contact me at (805) 882-1415 or Shastings@bhfs.com or Mack Carlson at (805) 882-1485 or Mcarlson@bhfs.com.

Sincerely,



Stephanie Osler Hastings

SOH

cc: Joseph Hughes, Klein DeNatale Goldner
Alex Dominguez, Klein DeNatale Goldner

EXHIBIT B

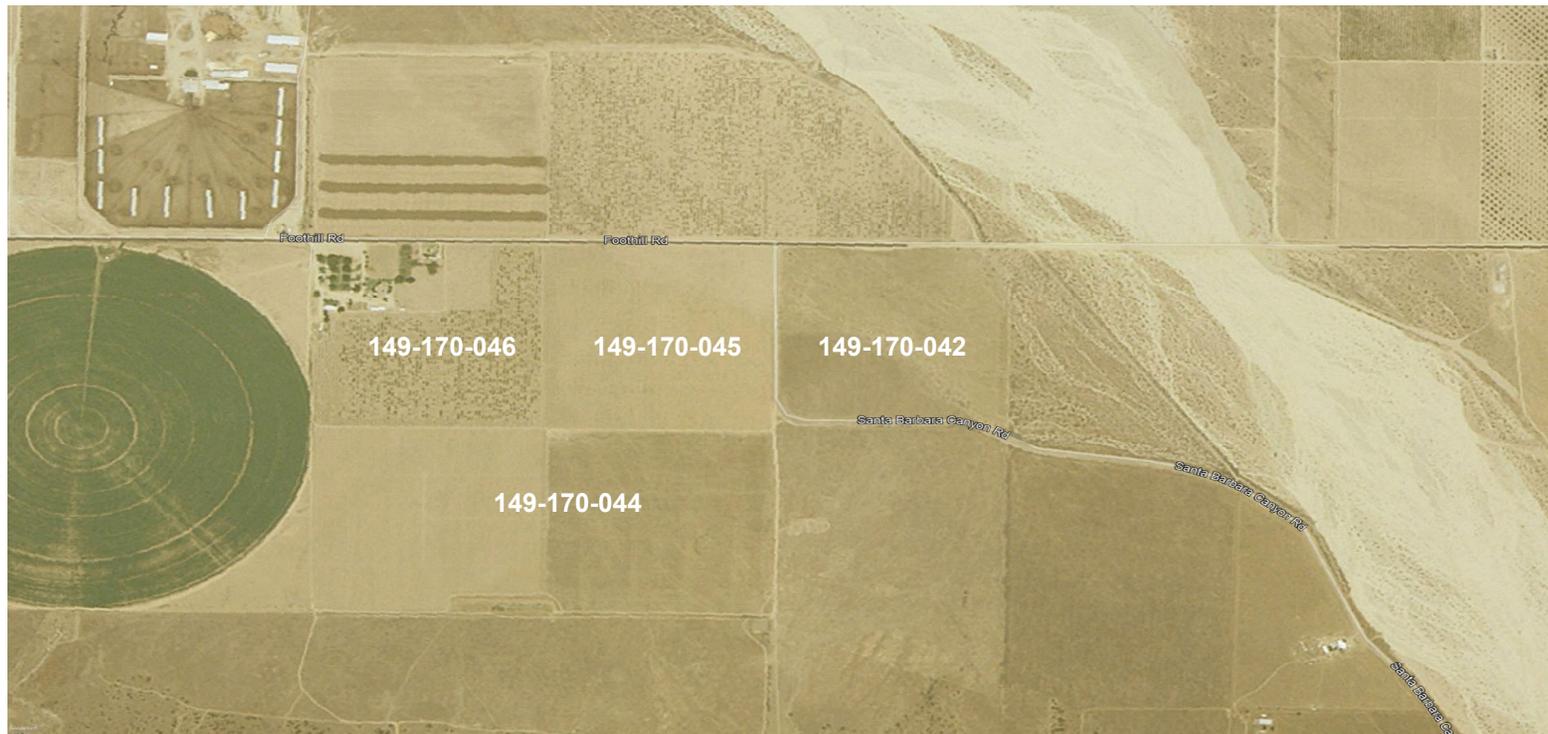
May 1994



May 2002



July 2003



July 2004



August 2005



EXHIBIT C



Form I IRRIGATOR

WATER USE ESTIMATE WORKSHEET – 2022
Cuyama Basin Groundwater Sustainability Agency

Name _____

Billing Address _____

Phone / Email _____

Instructions:

1. For 2022, input crop name(s)¹ in column A, the parcels those acres are farmed on in column B, the irrigated acres in column C, and the corresponding crop factors from the attached Exhibit C-1 in column D.
2. Multiply acres (column C) by the crop factor (column D) and input result in column E.
3. Total the acre-feet from column E in row 2.
4. Convert net water use (from row 2) to gross water use by multiplying total acre-feet from row 2, column E by the gross factor in row 3, column E and insert in row 4, column E.

	A	B	C	D	E
	Crop Name	Assessor Parcel Number(s) (APN) ²	Acres	Crop Factor	Water Use (acre-feet)
1				X	=
				X	=
				X	=
				X	=
				X	=
				X	=
				X	=
				X	=
				X	=
				X	=
2	Total Acre-feet (sum column E)				
3	Gross Conversion Factor				1.52
4	Total Gross Water Use				

¹If you have metered water use that is less than the crop factors, you can report metered water use.
²Cropping location information may be provided separately from this form. Please contact Taylor Blakslee at 661-477-3385, or tblakslee@hgcpm.com for any questions.

Exhibit I-1 – Crop Factors

Source Information

Crop Factors are evapotranspiration (ET) values from California Polytechnic State University's Irrigation Training and Research Center (ITRC) California Crop and Soil Evapotranspiration Report (Crop Report), ITRC Report No. R 03-001 accessible at www.itrc.org/reports/pdf/californiacrop.pdf.

The below values were calculated using ET reference averages for zone 10 from the Crop Report (see below figure).



Avg Annual Reference ET by Zone (inches/yr)

Zone	Total
1	33.0"
2	39.0"
3	46.3"
4	45.5"
5	43.9"
6	49.7"
7	43.4"
8	49.4"
9	55.1"
10	49.1"
11	53.0"
12	53.3"
13	54.3"
14	57.0"
15	57.0"
16	62.5"
17	66.5"
18	71.3"

Crop Factors

Crop	ET	Crop	ET
Alfalfa Hay	4.02	Melon, Radish, Squash, & Cucumbers	1.62
Alfalfa Seed, Sudan	3.60	Olives, Mature	3.27
Almonds	3.32	Olives, Deficit	2.58
Apples ¹ (Drip)	2.50	Onions and Garlic	1.99
Apples, Pear, Cherry, Plum, and Prune	3.33	Permanent Pasture	3.93
Barley Wheat, Oats	1.97	Pistachios	2.99
Blackeyed Peas	1.97	Potatoes	3.00
Carrots	2.20	Rootstock	2.23
Corn	2.43	Sorghum Grain	2.43
Cotton	2.70	Sugar Beets	2.70
Citrus	3.45	Tomatoes	2.20
Grapes with 40% cover crop	1.56	Walnuts	3.53
Grapes with 60% cover crop	2.02	Cannabis ²	TBD
Grapes with 100% cover crop	2.24	Hemp ³	TBD
Lettuce	2.20		

¹Value determined by local expertise in the Cuyama Valley.

²Value based on ____.

³Value based on ____.



TO: Standing Advisory Committee
Agenda Item No. 8a

FROM: Taylor Blakslee

DATE: October 30, 2025

SUBJECT: Discuss and Take Appropriate Action on the CMA Allocation Exchanges Policy (i.e. Water Market)

Recommended Motion

Board and SAC feedback requested.

Discussion

On January 15, 2025, the Board granted a one-year variance of up to 120 acre-feet to landowner David Lewis to continue his farming operations while the Board considered longer-term policy options. Several Directors noted that an allocation exchange program could serve as a long-term tool for similar circumstances. Because the variance expires after 2025, a Central Management Area (CMA) exchange program would need to be in place during 2025 if it is intended to address this issue.

An ad hoc committee (Directors Higbee, Jackson, Williams, and Wooster) met on June 18, 2025, to develop draft policy considerations for an allocation exchange program. These considerations were presented to the board on July 9, 2025, where the board directed legal counsel to prepare a draft policy.

On August 18, 2025, the ad hoc reconvened to review the draft policy and recommended bringing it to the full Board for approval. The policy was presented to the board on September 3, 2025, and is provided as **Attachment 1** for reference.

During the September 3, 2025, Board meeting, the questions were raised regarding inclusion of farming units. Director Anselm was appointed to the ad hoc following the meeting. The ad hoc reconvened on October 3 and October 18, 2025, to address these questions and develop updated recommendations, included as **Attachment 2**.

Additionally, the Small Farmer and Rancher Network submitted a letter to the ad hoc for consideration, which is provided as **Attachment 3**.

Staff request Board/SAC direction to incorporate the updated recommendations into the final policy.

Attachment 1

**RULES AND REGULATIONS FOR
THE TRANSFER OF GROUNDWATER ALLOCATIONS**

Adopted: _____

ARTICLE I GENERAL PROVISIONS

1.01 Authority. The Cuyama Basin Groundwater Sustainability Agency (**GSA**) may adopt rules, regulations, ordinances, and resolutions for the purpose of implementing the Sustainable Groundwater Management Act (**SGMA**), in compliance with any procedural requirements applicable to the adoption of such rule, regulation, ordinance, or resolution by the GSA. (Wat. Code, § 10725.2, subd. (b).)

1.02 Purpose. The purpose of these Rules and Regulations is to provide for the sustainable management of groundwater within the boundaries of the GSA.

1.03 Groundwater Sustainability Plan. The intent of these Rules and Regulations is to implement the provisions of the GSA's Groundwater Sustainability Plan (**GSP**). These Rules and Regulations may be amended at any time, as deemed necessary by the GSA's Board of Directors (**Board**), to achieve consistency with that GSP and groundwater sustainability within the GSA's boundaries.

1.04 Effective Date and Amendments Hereto. These Rules and Regulations shall become effective upon adoption by the Board, and may be added to, amended and/or repealed at any time by later resolution of the Board with any such additions, amendments, and/or repeals becoming effective upon adoption of the resolution, or as otherwise specified by the Board. However, adoption of these Rules and Regulations will not affect the effective date of any of the GSA's policies existing as of the date the Board adopts these Rules and Regulations.

1.05 Actions Against the GSA. Nothing contained in these Rules and Regulations may be deemed a waiver by the GSA or estop the GSA from asserting any defenses or immunities from liability as provided by law, including those provided in Division 3.6 of Title 1 of the Government Code.

1.06 Severability. If any provision of these Rules and Regulations, or the application thereof to any person or circumstance, is held invalid, the remainder of these Rules and Regulations, and the application of its provisions to other persons or circumstances, shall not be affected thereby.

ARTICLE II TRANSFER OF GROUNDWATER ALLOCATION

2.01 Transfer of Groundwater Allocation. A landowner may transfer its groundwater allocation to another landowner, subject to the following terms and conditions:

- a. The transferring-landowner and the receiving-landowner shall each hold title to real property located within the 2025 – 2029 Central Management Area, as that area is depicted in the map attached hereto and incorporated herein as **Exhibit A**.

- b. The transferring-landowner and the receiving-landowner shall each be in good standing with the GSA. “Good standing” means the landowner does not owe any outstanding fee or penalty to the GSA and is up to date with any and all applicable reporting requirements (e.g., groundwater extraction facility registration; groundwater extraction reporting; etc.).
- c. The transferred groundwater allocation shall be used solely within the Central Management Area.
- d. The transfer shall terminate on or before December 31, 2029.
- e. The transfer shall not cause an exceedance of any Minimum Threshold, as that term is defined within the GSP (as may be amended from time to time) as determined by GSA staff.
- f. The transfer shall be memorialized in writing using the Groundwater Allocation Transfer Form attached hereto and incorporated herein as **Exhibit B** and submitted to the GSA.

2.02 Process. Upon submission of the Groundwater Allocation Transfer Form, the GSA staff shall review the transfer to ensure compliance with these Rules and Regulations. Within 30 days of submission, the GSA staff shall inform the participating landowners of its findings approving the transfer, denying the transfer, or requesting additional information regarding the transfer. If the GSA staff denies the transfer, the participating landowners may appeal the decision to the Board. The Board’s decision shall be final.

2.03 Carryover of Groundwater Allocation Prohibited. If a landowner uses less than its allocation, including any additional amounts received via transfer, during any particular year (i.e., January 1 through December 31), that landowner may not carryover any such unused portion to the next year.

ARTICLE III

ACKNOWLEDGMENT OF THE PARTICIPATING PARTIES

3.01 Acknowledgment of the GSA’s Ongoing Authority. The Board has the authority to implement adaptive management actions at any time based on changing conditions within the Basin. The GSA will continue to monitor representative wells and Basin conditions. If data indicates that a previously approved transfer is contributing to one or more Undesirable Results including, but not limited to, the exceedance of Minimum Thresholds, the GSA may take corrective action. Such corrective actions include but not limited to restricting pumping, modifying allocations, or suspending future transfers as necessary to protect the sustainability of the Basin.

ARTICLE IV
PENALTIES AND FEES

4.01 Failure to Comply. The GSA shall not recognize or otherwise account for any transfer not memorialized using the GSA's Groundwater Allocation Transfer Form and approved by the GSA, as set forth herein.

4.02 SGMA Penalties. Upon violation of any provision of these Rules and Regulations by a landowner, the GSA shall impose a penalty of \$1,000, plus \$100 for each additional day upon which the violation continues if the landowner fails to comply within 30 days after being made aware of the violation by the GSA. Notwithstanding the foregoing, the GSA may petition the Superior Court for a temporary restraining order, preliminary or permanent injunction, or such other equitable relief as may be appropriate. The right to petition for injunctive relief is an additional right to those, which may be provided elsewhere in these Rules and Regulations or otherwise allowed by law.

EXHIBIT A

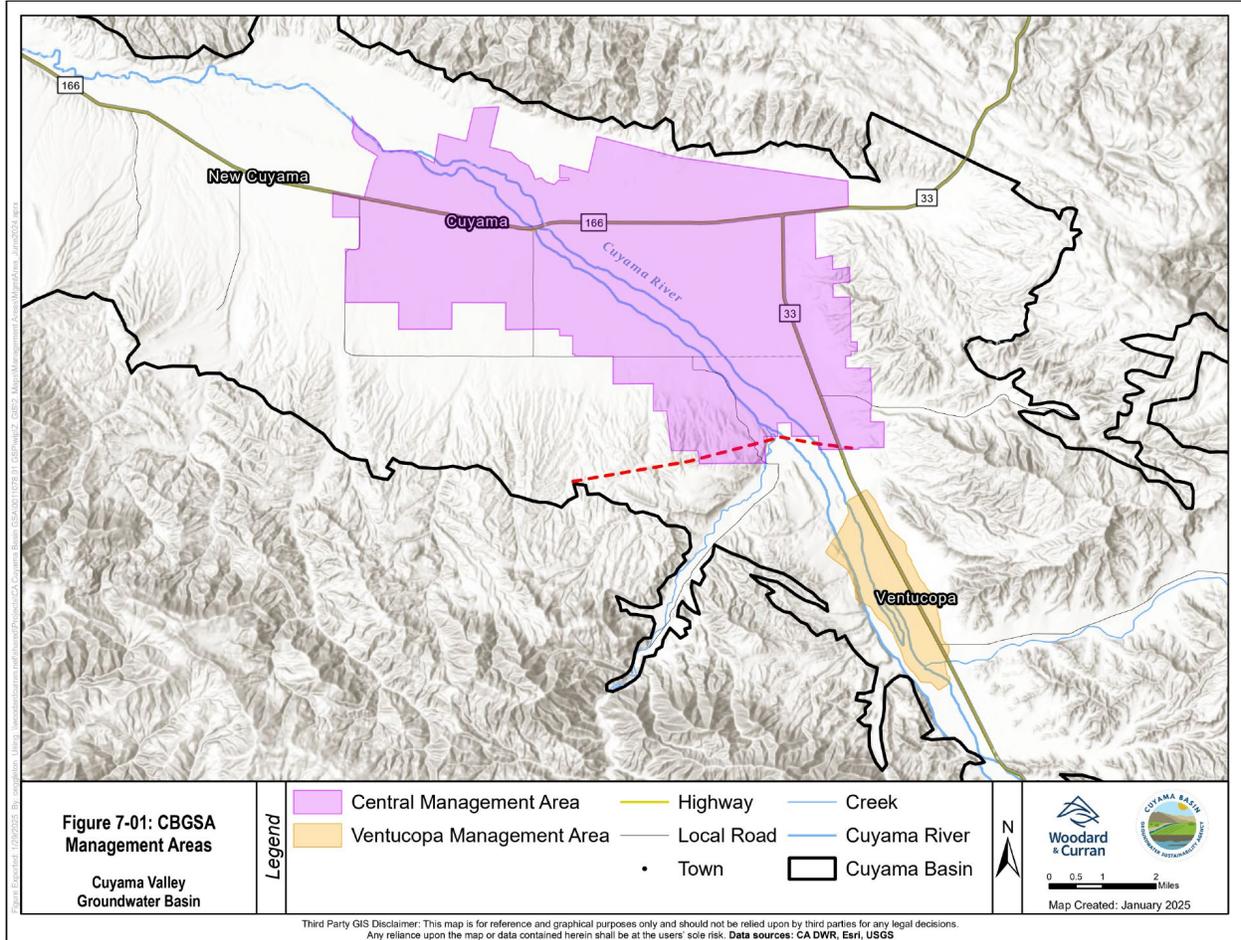


EXHIBIT B
GROUNDWATER ALLOCATION TRANSFER FORM
(For Landowner Use)

Name of Transferring-Landowner: _____

Parcels from which the Allocation is Leaving: _____

Name of Receiving-Landowner: _____

Parcels to which the Allocation is Going: _____

Please refer to the map in Attachment 1 to indicate parcel locations.

Amount of Water Being Transferred: _____

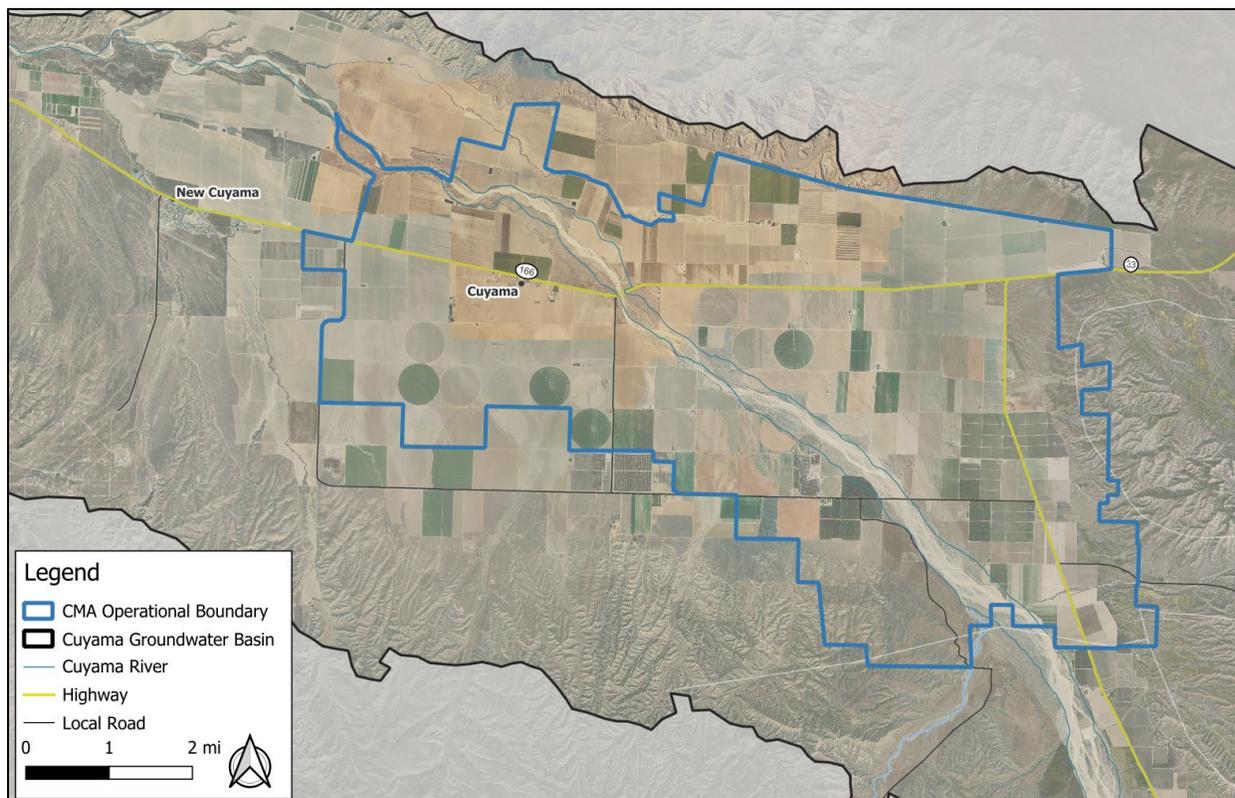
Term of Transfer: _____

Signature of Transferring-Landowner: _____

Signature of Receiving-Landowner: _____

ATTACHMENT 1

Map Instructions: Please indicate with an “X” where the transferred water is leaving and going.



GROUNDWATER ALLOCATION TRANSFER FORM, CONTINUED

(For Cuyama Basin GSA Staff Use)

Name of Transferring-Landowner: _____

Name of Receiving-Landowner: _____

Date Form Received: _____

1. Does the transferring-landowner hold title to real property within the CMA?

YES NO

2. Does the receiving-landowner hold title to real property within the CMA?

YES NO

3. Is the transferring-landowner in good standing with the GSA?

YES NO

If "NO," what corrective action is needed on part of the transferring-landowner?

4. Is the receiving-landowner in good standing with the GSA?

YES NO

If "NO," what corrective action is needed on part of the receiving-landowner?

5. Is the transferred groundwater allocation proposed for use solely within the CMA?

YES NO

6. Does the transfer terminate on or before December 31, 2029?

YES NO

7. Will the transfer cause any Undesirable Results?

YES NO

If "YES," please explain: _____

THIS TRANSFER IS HEREBY:

APPROVED

DENIED

ADDITIONAL INFORMATION/CORRECTIVE ACTION NEEDED: _____

Cuyama Basin Groundwater Sustainability Agency

Discuss and Take Appropriate Action on the CMA Allocation Exchanges Policy (i.e. Water Market)



Background

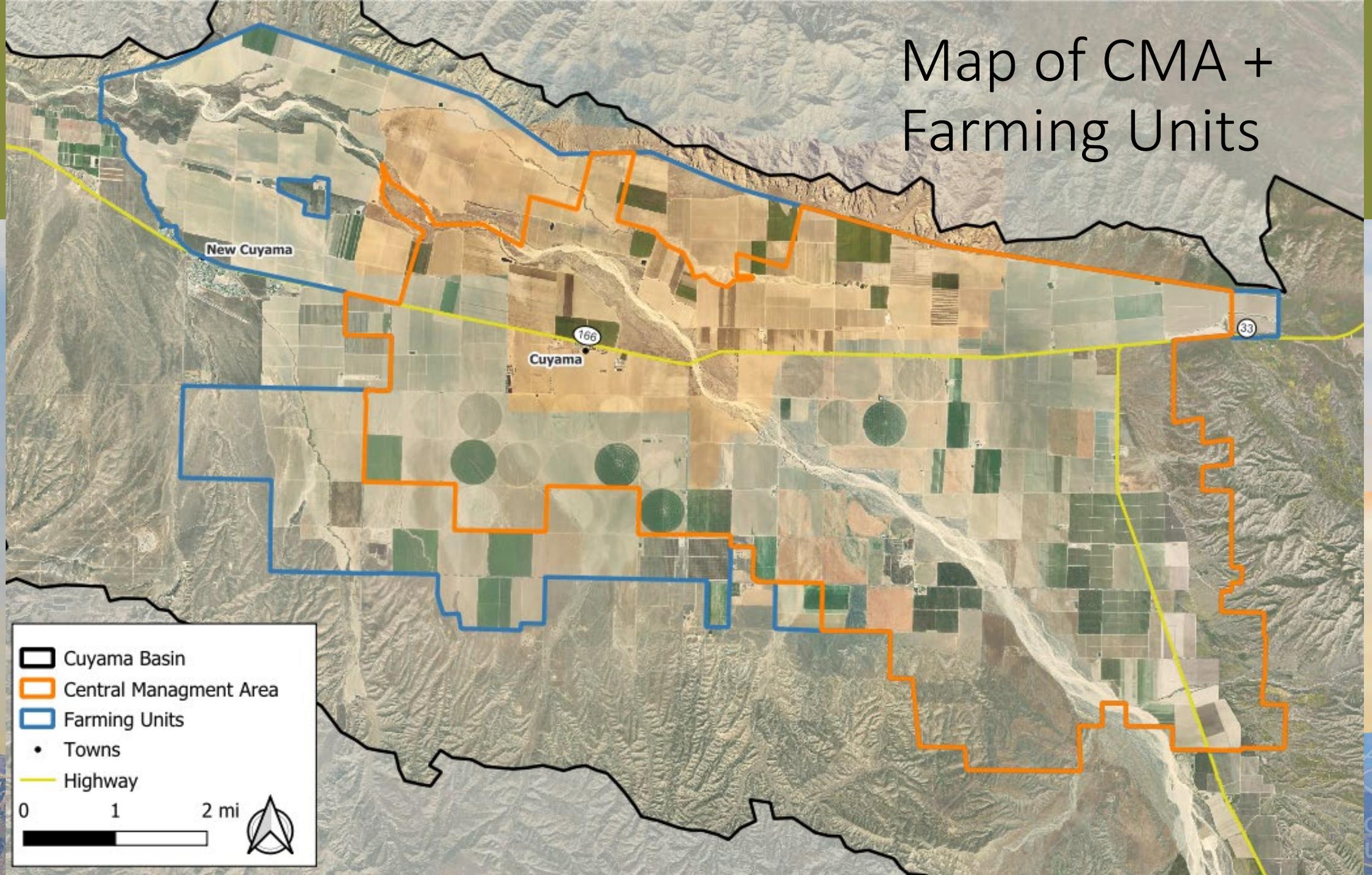
- On May 7, 2025, the CBGSA Board adopted the fiscal year 2025-2026 budget, which included potentially developing and implementing an allocation exchange (i.e. water market) in the CMA.
 - A Board ad hoc was formed and met on June 18, 2025, to review the draft policy considerations for potentially developing an allocation exchange program.
- On July 9, 2025, the board reviewed and provided feedback on the key policy considerations.
 - The ad hoc met again on August 5, 2025, to review the draft policy before bringing to the board on September 3, 2025.
- On September 3, 2025, the board reviewed the policy and noted that the map did not include the farming units.
 - This prompted board discussion and led to the decision to hold an additional ad hoc meeting to address the issues raised.

Allocation Exchange Policy

Issues Raised during September 3, 2025, Board and discussed with the ad hoc on October 16, 2025:

- How to address Farming Units.
 1. Should they automatically be included?
- Who gets to make a deal?
 1. Farming unit operator
 2. All parcel owners within a Farm Unit
- GSA to facilitate a transfer registry?
 1. Compile public information (landowner list) and post online.
 2. Create a voluntary registry where landowners opt in to share contact details.
 3. Do nothing.
- Need to perform a material injury analysis for exchanges? Consider what entities have done (e.g. Antelope Valley)

Map of CMA + Farming Units



Allocation Exchange Policy

1. Inclusion of Farming Units

- The ad hoc recognized the need to provide landowners flexibility.
- **Ad hoc recommendation:** Include farming units in allocation exchanges, with language clarifying that eligibility applies to portions outside the CMA with allocations.

2. Who makes the deal?

- All entities within the farming unit must sign off on any transfer.

3. Transfer Participant Registry

- Ad hoc feedback
 - Value as a bulletin board for contact info.
 - Agreed the market was currently too small to justify creating a registry (majority opinion).
- **No recommendation**

4. Material Injury Analysis

- Ad hoc agreed analysis is premature given the limited size of the CMA.
- **Ad hoc recommendation:** No material injury analysis required for current CMA exchanges.

Small Farmer and Rancher Letter

- SFAR provided letter to the ad hoc on October 1, 2025, outlining components to consider in developing a water market to support small and mid-size farmers within the CMA.
 - The ad hoc considered and discussed the meeting on October 3, 2025, and October 16, 2025.
- The ad hoc appreciated the concepts provided in the letter and expressed interest in considering these if the allocation exchanges expands to broader water market
- At this time, the ad hoc is not recommending incorporating water market concepts in the SFAR letter in the proposed groundwater allocation exchange policy.

To: Chair Bantilan and Members of the Water Market Ad Hoc Committee
 From: Members of the Small Farmer and Rancher Network Steering Committee
 Margaret Brown, Lynn Carlisle, Roberta Jaffe, Brenton Kelly, William Price
 Date: October 1, 2025

The Cuyama Valley Small Farmer and Rancher Network (SFAR) would like to advance the following considerations as the GSA begins to develop a water market for pumpers in the Cuyama Valley :

Goal: Establish a transparent Cuyama Basin Water Market for the Central Management Area to protect small and medium size farmers who are at risk of losing their crops.

General Management:

We propose the Cuyama Basin Water Allocations Market (the “Market”) be administered by the GSA. The GSA would receive a portion of all water transactions to cover administrative costs. The Market would be piloted for the first year and reviewed and revised by the GSA Board of Directors.

Suggested Components:

- The Market would include a Marketplace website where all water that is available for sale as well as buyers who need water would be listed. Completed transactions and reported AFY used would also be posted.
- To participate in the Market, buyers and sellers would be required to register. To ensure transparency, annual reporting of all transactions should be publicly available.
- The GSA may set the price of water (see Options 2 & 3 below), with consideration for the needs of small-scale pumpers as part of the GSA’s small farmer policies.
- To cover the GSA’s costs to administer the Market, the GSA would receive funds from each transaction. (See Options below.)

Options for the Market:

Option 1 could function in conjunction with either Option 2 or 3. Option 2 and 3 are suggested as possible ways to establish an affordable amount of water available to start the Market. To ensure availability it is recommended that Option 2 or 3 be included in the Market.

Thus the Market would constitute a combination of:

Option 1 + Option 2

or

Option 1 + Option 3

Option 1: A seller offers an amount directly from their allocation within the same calendar year. This is done in accordance with the suggested components above. The seller would request a sale price which could be negotiated with the buyer and would receive the negotiated value minus a transaction fee to be paid to the GSA to cover administrative costs. This Option requires a willing seller to offer a sale.

Option 2: All unused allocations (carryover) revert to the GSA at the end of the calendar year. The GSA could decide to place a portion of these unused allocations on the Market in the following year, at a price determined by the GSA. This Option provides a minimal amount of water for buyers in need of keeping perennial crops irrigated without taking it away from the current year's allocations.

Option 3: The Cuyama Basin Hydrological Model is assumed to have a margin of error of +/- 10% in the calculations for sustainable yield. This is potentially equivalent to several thousand AFY. Some portion of this statistical volume of model uncertainty could be considered sellable water, which the GSA may elect to place on the water market at a GSA-determined price. This Option would not decrease as allocations are reduced and would be available into 2040 or until the Model is measurably improved.

Questions to Establishing a Market:

- How are farming units (which have the most water available) incentivized to participate in a water market of any kind?
- How can the Market ensure accessibility to small-scale farmers?

Alternatives and Notes to Consider:

- Adopt a temporary water market policy (1 year) to address immediate needs of farmers while considering a more comprehensive policy;
- Continue the variance policy while giving more time to the design of a water market policy.
- Consider the actual scale of small farmer water needs: An analysis of water use by five small farmers in the CMA projects that, given their current allocations and land use, by 2029 *collectively* they will need only an additional 309AF *for the year* in order to keep their perennial crops alive and their family businesses viable. The SFAR Network is recommending that a Cuyama Basin Water Market recognize and plan for the small—but absolutely essential—water needs of small pumpers when designing an effective market.

The SFAR Network appreciates the opportunity to submit suggestions for your consideration. As the Water Market ad hoc committee explores these ideas, we look forward to collaborating further with additional information. Under an agreement with the DWR, we have access to technical assistance partners, who can help provide specific analysis that the committee may need in developing a Water Market and its impact on small-scale pumpers.



TO: Standing Advisory Committee
Agenda Item No. 8d

FROM: Taylor Blakslee

DATE: October 30, 2025

SUBJECT: Discuss and Take Appropriate Action on Options to Address Adaptive Management Processes

Recommended Motion

Board and SAC feedback requested.

Discussion

During the July 9, 2025, Board of Directors meeting, it was brought to the Board's attention that Opti Well #610 exceeds the minimum threshold (MT). During the September 3, 2025 Board meeting, it was brought to the Board's attention that Opti Well #833, and nested Opti Well #77, 420, 421 exceed their MTs. Also during the September 3, 2025 Board meeting, the Adaptive Management Standard Operating Procedure was adopted. Per the SOP, when a well exceeds the MT, an ad hoc committee should be formed to investigate the exceedance and develop appropriate adaptive management strategies to address it.

On October 2, 2025, an adaptive management ad hoc committee (Directors Albano, Reely, Young) convened to review the MT exceedances and next steps are provided as **Attachment 1**.

Update on Status of Adaptive Management Implementation

No.	Opti Well #	Status
1	833	<ul style="list-style-type: none">Continue to monitor for anticipated recovery. Drawdown due to recent firefighting efforts.
2	77, 420, 421	<ul style="list-style-type: none">Staff reaching out to owners of nearby active wells (within a 1-mile radius of the RMW). Requesting GWL data from landowners of nearby active wells to determine potential correlated impacts to beneficial users.Will develop options for Board consideration once impact and cause investigation complete.
3	610	<ul style="list-style-type: none">Outreach to well owner and nearby active wells.Will develop options for Board consideration once impact and cause investigation complete.



TO: Standing Advisory Committee
Agenda Item No. 8e

FROM: Taylor Blakslee

DATE: October 30, 2025

SUBJECT: Discuss and Take Appropriate Action on Options to Address New Pumping Outside the Management Area

Recommended Motion

Board and SAC feedback requested.

Discussion

On July 9, 2025, the Cuyama Basin Groundwater Sustainability Agency Board directed staff to prepare a list of options to address new pumping outside the existing management areas.

On September 3, 2025, staff and legal counsel presented a range of management approaches, including basin-wide allocations, additional management areas, and limits on increased pumping outside the Central Management Area.

The Board directed staff to continue developing a combined approach of Options 3 and 4, and the refined draft options are included as **Attachment 1**.

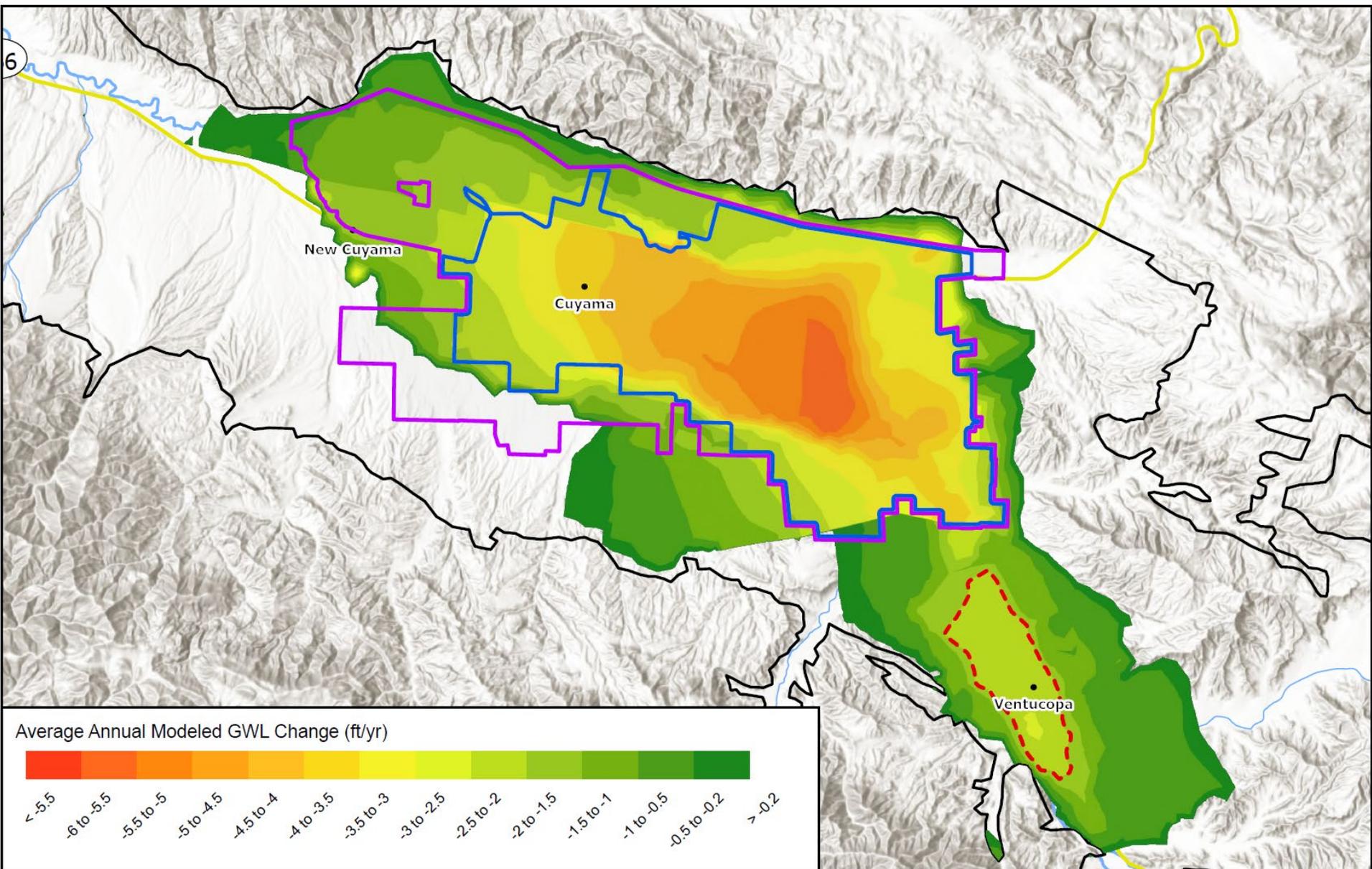
Cuyama Basin Groundwater Sustainability Agency

Discuss and Take Appropriate Action on Options to Address
New Pumping Outside the Management Area



Background

- On July 9, 2025, the Board directed staff to develop options to address potential increased water use outside the Central Management Area (CMA).
- On September 3, 2025, staff presented several options and the Board expressed an interest in options 3 and 4 (listed below).
 - **Option 3. Expand Groundwater Allocations Basin-Wide**
 - **Option 4. Manage Basin Outside Existing Management Areas**
 - Establish new management area outside of existing MAs.
 - Allow historic pumping to occur.
 - For pumping over a historic use, or new groundwater use, require a technical study demonstrating the expanded, or new use would not impact the GSA's ability to achieve sustainability.
- A summary of the current water management approaches and existing Board direction is provided on the following slides.
- **Staff is seeking Board direction on the approach to manage the potential increase of water use outside the CMA.**



**CBWRM v030d
Management Areas**

Cuyama Valley
Groundwater Basin

Legend

CMA + Farming Units	Highways
CMA	Cuyama River
Ventucopa MA	Streams/Creeks
Cuyama Basin	

N

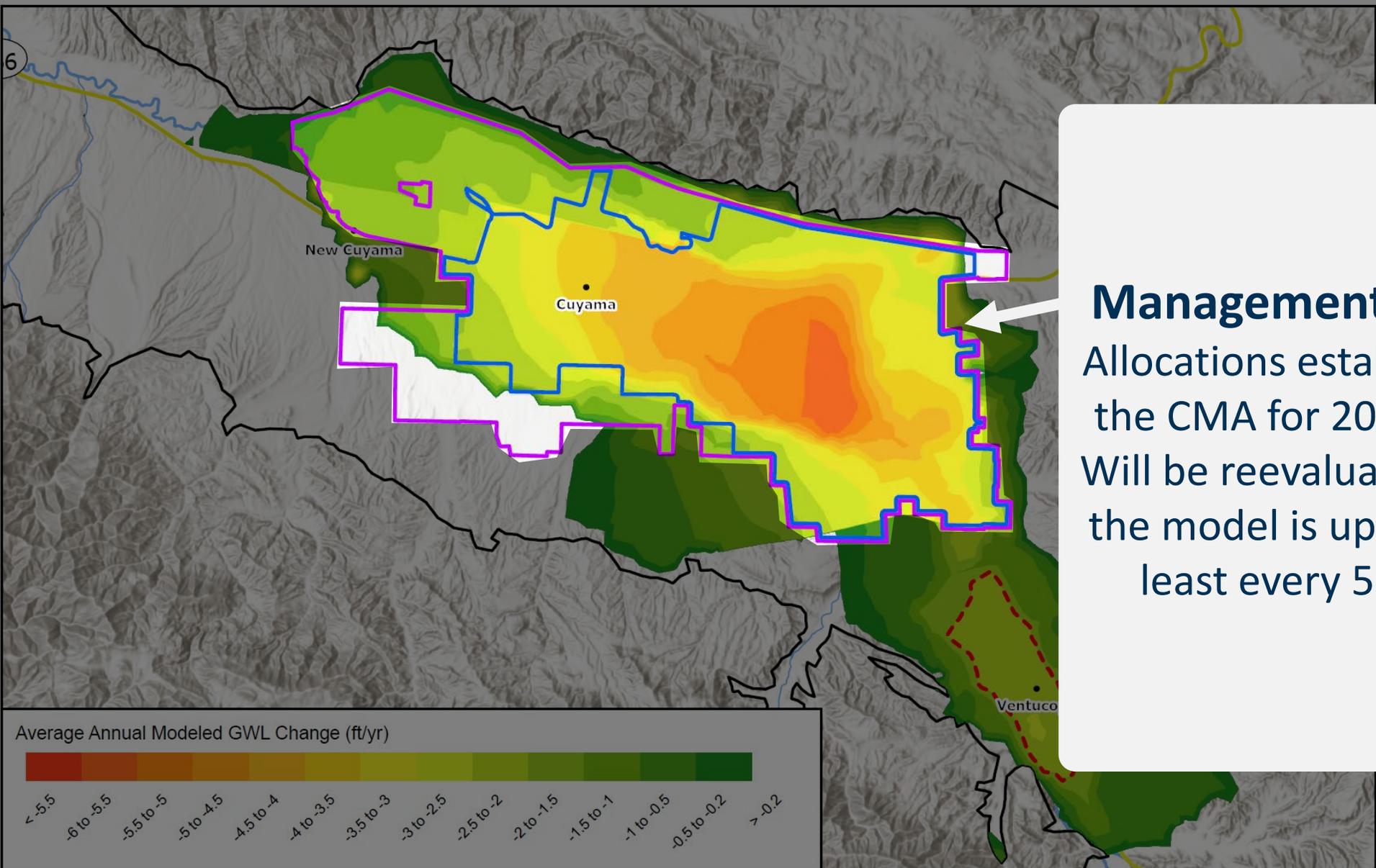
Woodard & Curran

CUYAMA BASIN
GROUNDWATER SUSTAINABILITY AGENCY

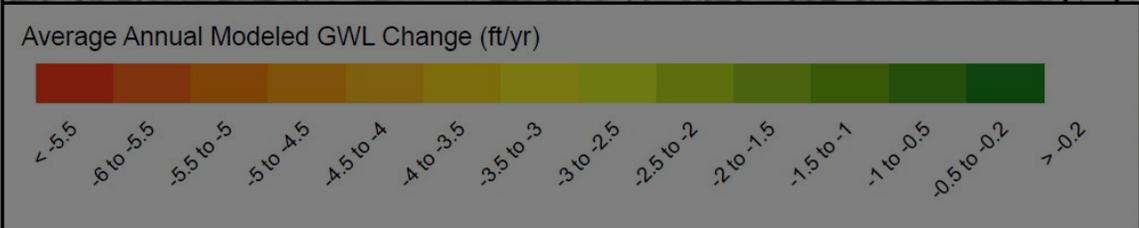
0 0.5 1 2 Miles

Map Created: October 2025





Management Action
Allocations established in the CMA for 2025-2029. Will be reevaluated when the model is updated. At least every 5 years.



CBWRM v030d Management Areas
Cuyama Valley Groundwater Basin

<i>Legend</i>	CMA + Farming Units	Highways
	CMA	Cuyama River
	Ventucopa MA	Streams/Creeks
	Cuyama Basin	

Woodard & Curran

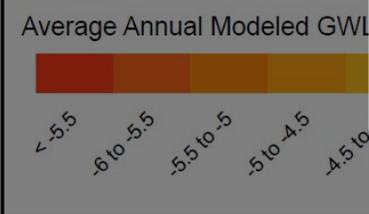
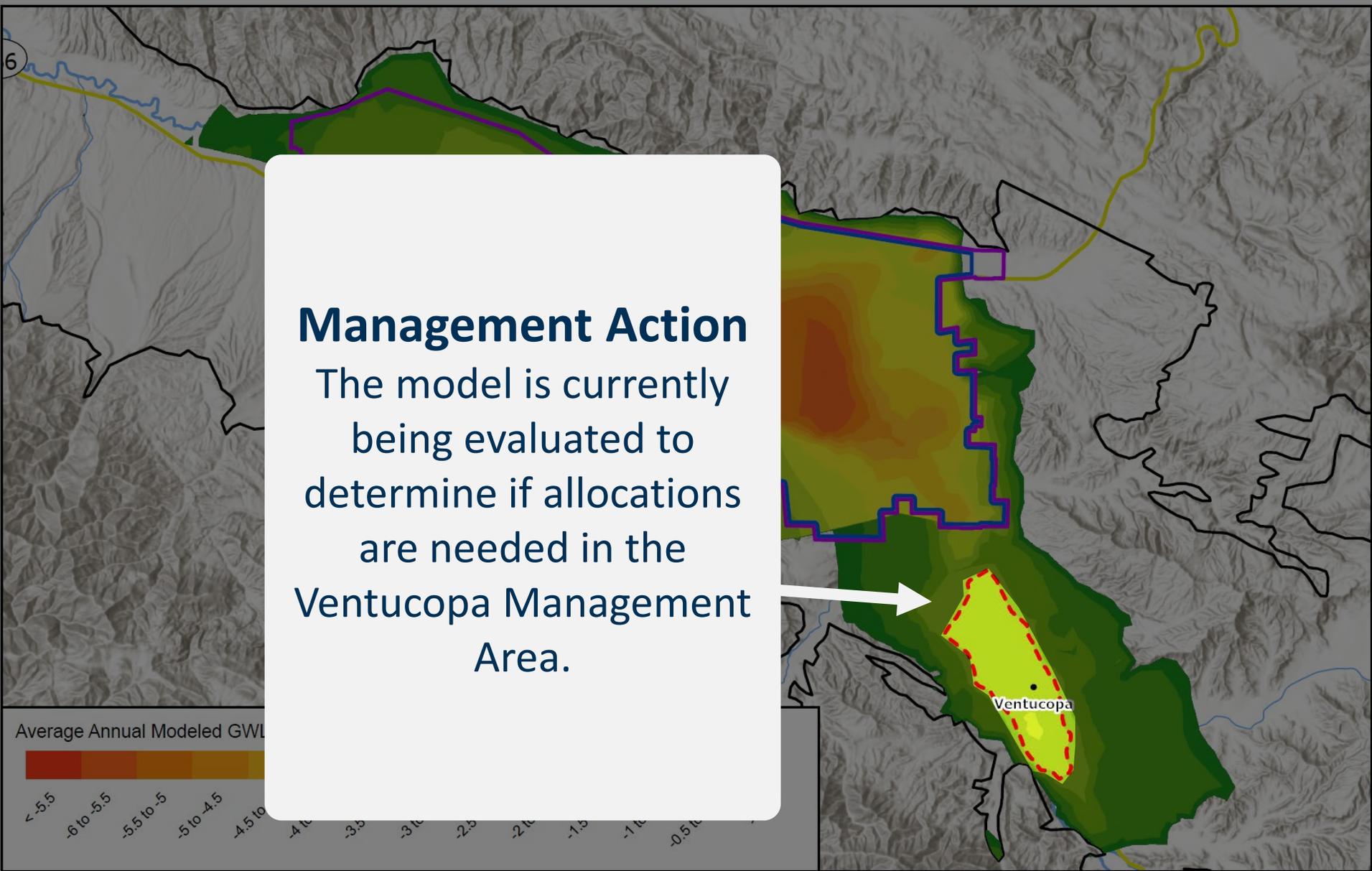
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Map Created: October 2025



Management Action

The model is currently being evaluated to determine if allocations are needed in the Ventucopa Management Area.



CBWRM v030d Management Areas
Cuyama Valley Groundwater Basin

Legend	CMA + Farming Units	Highways
	CMA	Cuyama River
	Ventucopa MA	Streams/Creeks
	Cuyama Basin	

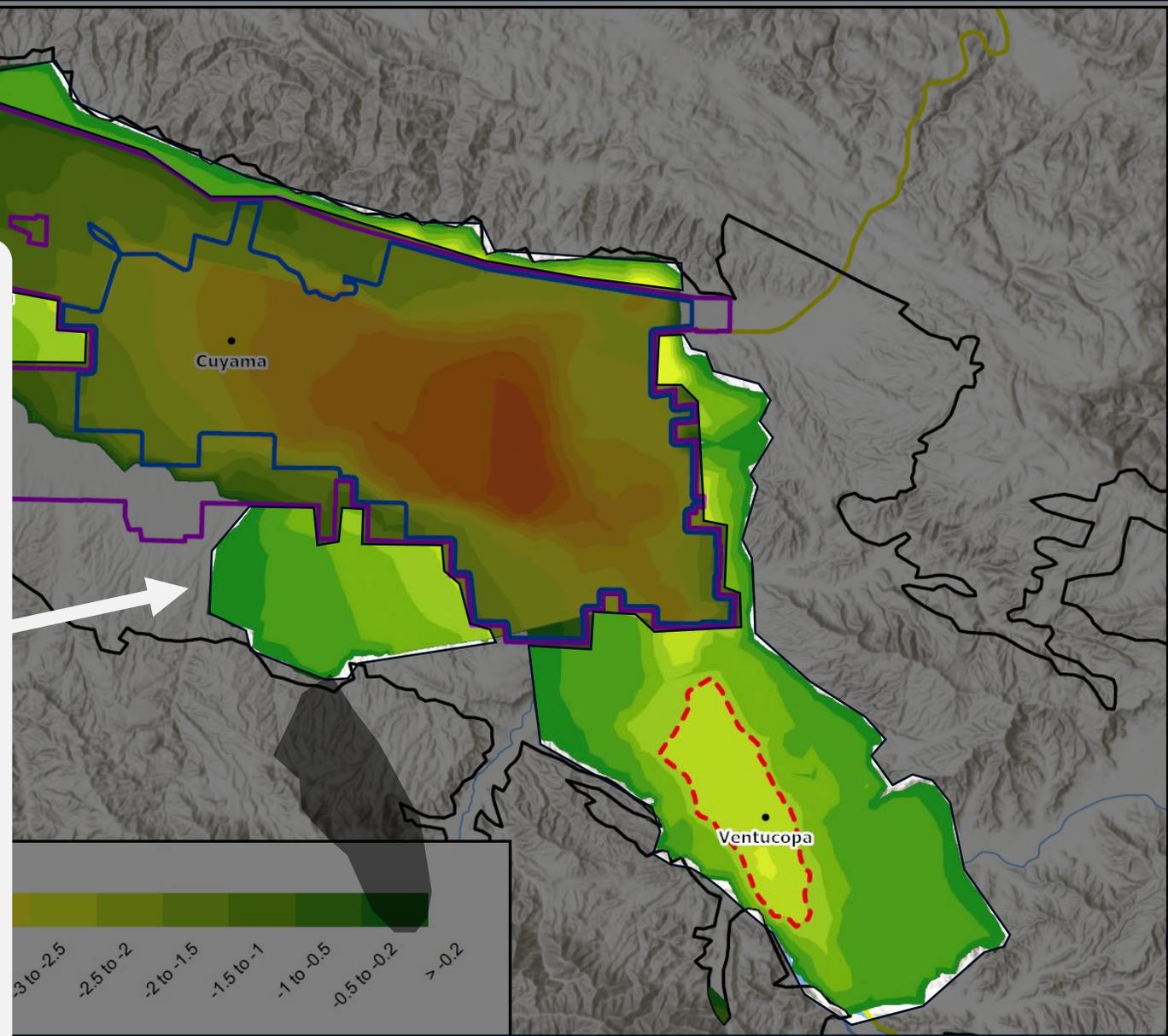
Woodard & Curran
CUYAMA BASIN
GROUNDWATER SUSTAINABILITY AGENCY

0 0.5 1 2 Miles
Map Created: October 2025



Management Actions

1. Potential pumping allocations in other areas of the Basin may be considered in the future as additional data collection and technical analysis is performed to provide a better understanding of water balance conditions in these areas (GSP Sec. 7.5.2).
2. The Board directed staff to annually perform a qualitative assessment on whether allocations are required outside the existing management areas.



MA + Farming Units	Highways
MA	Cuyama River
	Streams/Creeks
Ventucopa MA	
Cuyama Basin	

Cuyama Valley
Groundwater Basin

Leg

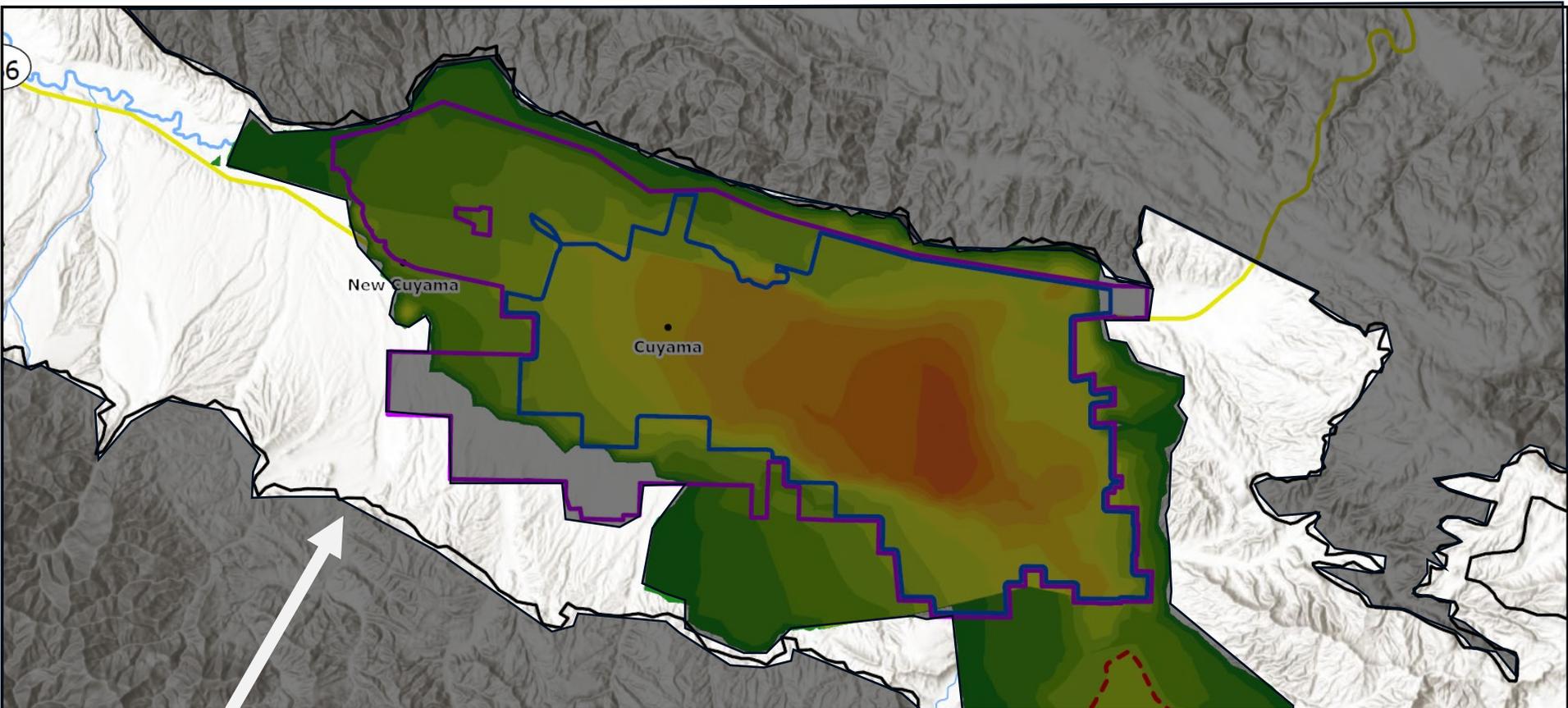
Woodard & Curran

CUYAMA BASIN
GROUNDWATER SUSTAINABILITY AGENCY

0 0.5 1 2 Miles

Map Created: October 2025





GSP Section 7.5.2 Pumping Allocations in Central Management Area

“Consistent with the magnitude of projected overdraft estimated by the CBWRM, pumping allocations would not apply to users outside of the Central Management Area and farming units. Potential pumping allocations in other areas of the Basin may be considered in the future as additional data collection and technical analysis is performed to provide a better understanding of water balance conditions in these areas.”

Cuyama Valley Groundwater Basin Cuyama Basin



Water Management Outside of Management Areas

- Historically, the Board philosophy on water management outside of management areas has been to provide flexibility to landowners and only manage water use outside a management area if:
 1. A new management area is identified by a model update due to increased water use, or
 2. Sustainable management criteria exceedances occur which could require temporary, localized pumping reductions.
- Does the Board want to:
 1. Continue to maintain the previous approach for areas that are not expected to be in overdraft? Or,
 2. Pursue a more active approach to ensure new overdraft areas develop?



TO: Standing Advisory Committee
Agenda Item No. 9a

FROM: Brian Van Lienden, Woodard & Curran

DATE: October 30, 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**.

Cuyama Basin Groundwater Sustainability Agency

Update on Groundwater Sustainability Plan Activities

Brian Van Lienden

October 30, 2025



Sep-Oct Accomplishments

- ✓ Performed an assessment of model data and performance in the Ventucopa Management Area
- ✓ Performed geophysical field analysis for the updated Santa Barbara Canyon Fault Investigation
- ✓ Performed analysis of potential land use updates in response to variance request
- ✓ Performed DMS data updates
- ✓ Prepared grant invoice submittal and deliverables for technical grant tasks



TO: Standing Advisory Committee
Agenda Item No. 9b

FROM: Brian Van Lienden, Woodard & Curran

DATE: October 30, 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**.

Cuyama Basin Groundwater Sustainability Agency

Update on Grant-Funded Projects

Brian Van Lienden

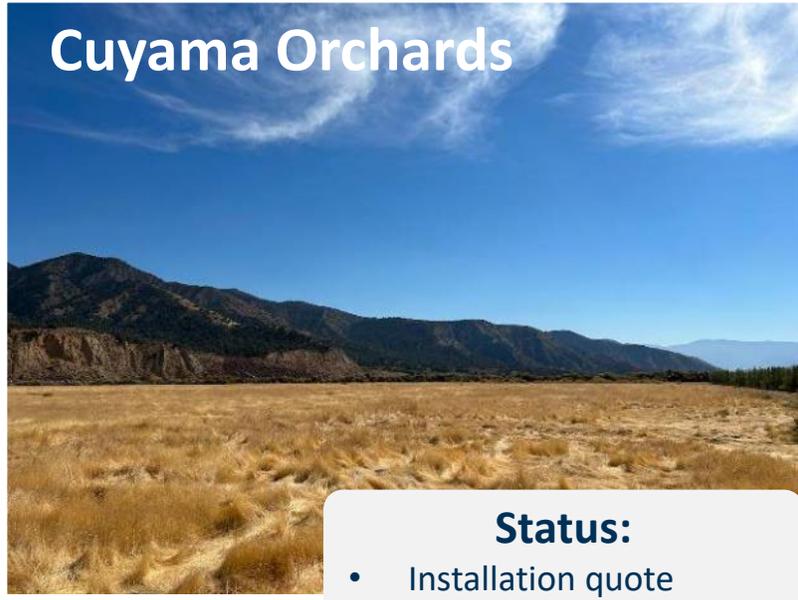
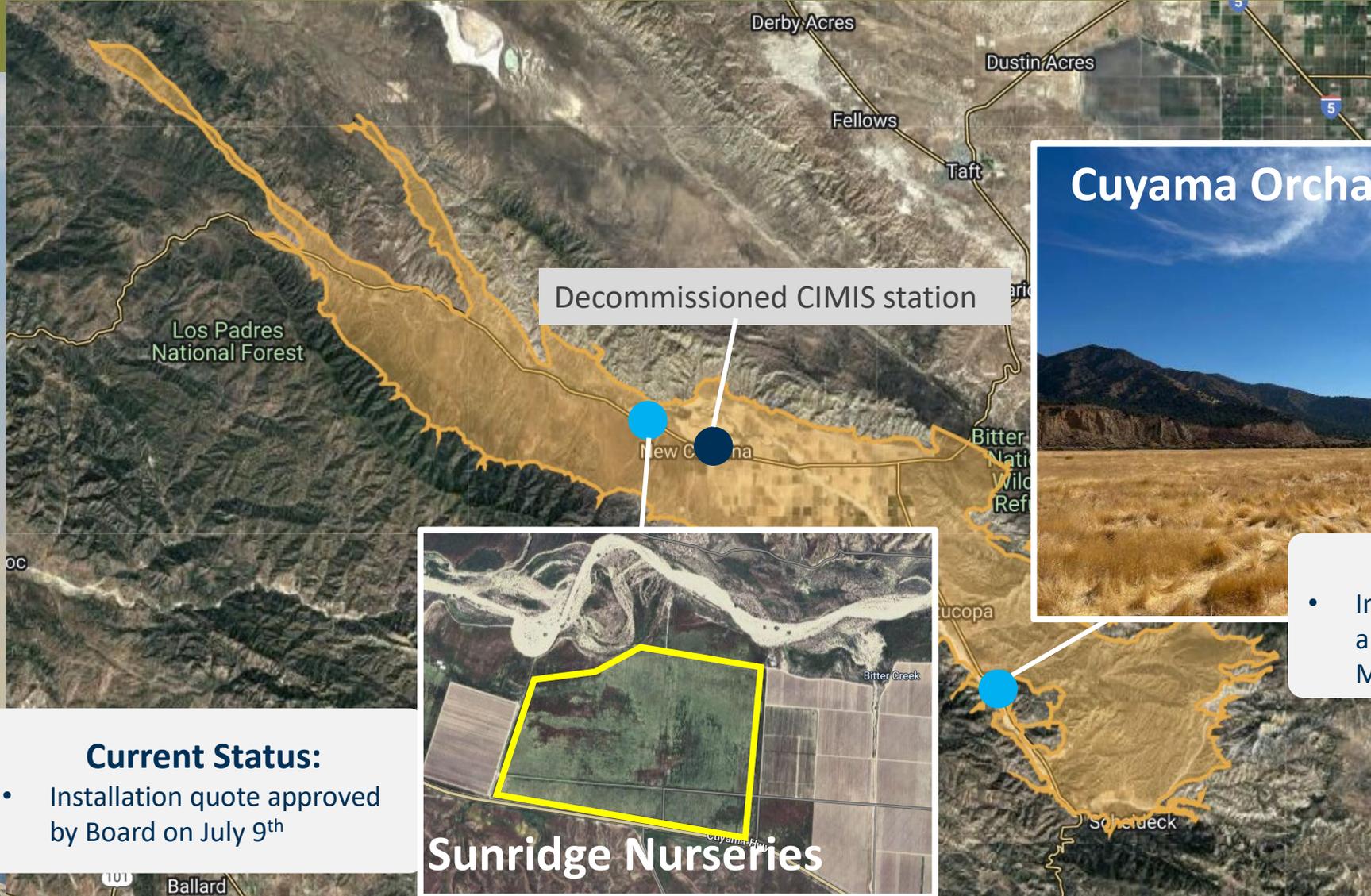
October 30, 2025



Update on Grant Funded Projects

- CIMIS station installation:
 - Amended grant agreement allows for reimbursement of work completed through December 2025
 - Landowners are currently working to perform installation of new land use and irrigation required for CIMIS stations
- Work on all other technical grant components is complete as of the end of June 2025

Sites for New CIMIS Stations



Cuyama Orchards

Status:

- Installation quote approved by Board on Mar 5th



Sunridge Nurseries

Current Status:

- Installation quote approved by Board on July 9th



TO: Standing Advisory Committee
Agenda Item No. 10c

FROM: Taylor Blakslee, Hallmark Group

DATE: October 30, 2025

SUBJECT: Board of Directors Agenda Review

Recommended Motion

None – informational only.

Discussion

The Cuyama Basin Groundwater Sustainability Agency Board of Directors agenda for the November 5, 2025, Board of Directors meeting is provided as **Attachment 1**.



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
Matthew Young Secretary, Santa Barbara County Water Agency
Byron Albano Treasurer, Cuyama Basin Water District
Arne Anselm County of Ventura
Deborah Williams Cuyama Community Services District

Jane Wooster Cuyama Basin Water District
Jason Higbee Cuyama Basin Water District
Jimmy Paulding County of San Luis Obispo
Katelyn Zenger County of Kern
Steve Jackson Cuyama Basin Water District

AGENDA

November 5, 2025

Agenda for a meeting of the Cuyama Basin Groundwater Sustainability Agency Board of Directors to be held on Wednesday, November 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 Avenue, 5th 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 (Bianchi) (2 min)
5. Standing Advisory Committee Meeting Report (Kelly) (3 min)
6. Report from Auditors on Fiscal Year 2024-2025 Audit (Daniells Phillips Vaughan & Bock) (10 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.

7. Approve September 3, 2025, Meeting Minutes (Bantilan) (1 min)
8. Approve Payment of Bills for August and September 2025 (Blakslee) (1 min)

9. Approve Financial Reports for August and September 2025 (Blakslee) (1 min)
10. Approve the 2026 Meeting Calendar (Bianchi) (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.

11. Groundwater Sustainability Plan Implementation
 - a) Discuss and Take Appropriate Action on the Plan and Timeline to Evaluate Allocations in the Ventucopa Management Area (Beck/Van Lienden/Ceyhan) (90 min)
 - b) Discuss and Take Appropriate Action on Tri-County Pistachio Variance Request (Blakslee/Ceyhan) (30 min)
 - c) Discuss and Take Appropriate Action on the CMA Allocation Exchanges Policy (i.e. Water Market) (Beck) (30 min)
 - d) Discuss and Take Appropriate Action on Options to Address Adaptive Management Processes (Blakslee) (20 min)
 - e) Discuss and Take Appropriate Action on Options to Address New Pumping Outside the Management Area (Blakslee/Dominguez) (30 min)

REPORT ITEMS

12. Administrative Updates
 - a) Report of the Executive Director (Blakslee) (5 min)
 - b) Report of the General Counsel (Hughes) (5 min)
13. Technical Updates
 - a) Update on Groundwater Sustainability Plan Activities (Van Lienden) (5 min)
 - b) Update on Grant-Funded Projects (Van Lienden) (5 min)
14. Report of Ad Hoc Committees (1 min)
15. Directors' Forum (1 min)
16. Public Comment for Items Not on the Agenda (5 min)
17. Correspondence (1 min)

CLOSED SESSION

18. 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)
19. Adjourn (6:25 p.m.)