



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

April 30, 2026

Agenda for a meeting of the Cuyama Basin Groundwater Sustainability Agency Standing Advisory Committee meeting to be held on Thursday, April 30, 2026, at 5:00 PM at the **Cuyama Valley Family Resource Center 4689 CA-166, New Cuyama, CA 93254**.

Participate via computer at: <https://shorturl.at/wVJUu> or by going to Microsoft Teams, downloading the free application, then entering Meeting ID: 220 650 258 876 88 Passcode: nm2qC2QV, or telephonically at (469) 480-3918, Phone Conference ID: 182 829 294#

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

300 Foothill Rd
Maricopa CA, 93254

112 W Cielo Ave
Ridgecrest, CA 93555

11601 Bolthouse Dr Suite 200
Bakersfield, CA 93311

144 De La Costa Ave
Santa Cruz, CA 95060

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 (Bianchi) (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.*
6. Introduction of New Legal Counsel (Collins) (10 min)

ACTION ITEMS

7. Approval of February 26, 2026, Minutes (Kelly) (3 min)
8. Groundwater Sustainability Plan Implementation

- a) Discuss and Take Appropriate Action on Potential Areas of Overdraft Outside the Central Management Area (Blakslee/Bianchi) (20 min)
- b) Discuss and Take Appropriate Action on GSA Response to DWR's Additional Information Request Regarding their Review of the Amended 2025 GSP and Periodic Evaluation (Blakslee/Van Lienden) (60 min)
- c) Discuss and Take Appropriate Action on FY 2026-2027 Budget and Cash Flow (Blakslee) (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 (Collins) (1 min) – *Verbal*
- c) Report on Final 2025 Basin-wide Groundwater Use, 2025 CMA Allocation Compliance, and CMA Groundwater Allocation Exchanges (Bianchi) (5 min)
- d) Board of Directors Agenda Review (Bianchi) (3 min)

11. Items for Upcoming Sessions (1 min)

12. Committee Forum (1 min)

13. Correspondence (1 min)

14. Adjourn (7:55 p.m.)

Cuyama Basin Groundwater Sustainability Agency Standing Advisory Committee Meeting

February 26, 2026

Draft Meetings Minutes

PRESENT:

Kelly, Brenton – Chair
Jaffe, Roberta
DeBranch, Brad
Gaillard, Jean
Lewis, Dave

Bianchi, Grace – Project Coordinator, Hallmark Group
Blakslee, Taylor – Executive Director, Hallmark Group
Van Lienden, Brian – Woodard & Curran

ABSENT:

Haslett, Joe – Participating as stakeholders
Caufield, John – Participating as stakeholders

1. Call to Order

Cuyama Basin Groundwater Sustainability Agency (CBGSA) Standing Advisory Committee (SAC)
Chair Kelly called the meeting to order at 5:04 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 the floor public comment.

Committee Member Lewis expressed concern about allocation process inadequacy for small pumpers.

ACTION ITEMS

6. Approval of January 8, 2026, Minutes

Committee Chair Kelly opened the floor for comments on the January 8, 2026, CBGSA SAC meeting minutes.

MOTION

Committee Member Kelly made a motion to approve January 8, 2026, CBGSA SAC meeting

minutes. The motion was seconded by Committee Member Lewis. A roll call vote was made, and the motion passed.

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

7. Groundwater Sustainability Plan Implementation

a. Discuss and Take Appropriate Action on DWR Review of GSP and Periodic Evaluation

Mr. Blakslee provided an overview of the comments from the Department of Water Resources (DWR) on the Groundwater Sustainability Plan and Periodic Evaluation. He reported that staff met with a Board ad hoc committee and DWR, and written responses are due July 31, 2026, with draft responses to return to the SAC in April and the Board in May.

Committee Member Jaffe if staff was surprised by any of DWR's comments. Mr. Blakslee responded that he was surprised by the number of comments and noted policy-level items related to nitrate and arsenic monitoring, subsidence SMC methodology, and the timing of promoting dedicated monitoring wells.

Mr. Van Lienden added that DWR staff appeared receptive to explanations regarding updated minimum thresholds but requested clearer written justification. He noted that subsidence comments likely reflect DWR's newer Best Management Practice guidance affecting many basins statewide.

Chair Kelly asked whether metered pumping data could be incorporated into the groundwater model. Mr. Van Lienden responded that the model simulates long-term historical and projected conditions, so metered data are used for calibration rather than direct model input.

Chair Kelly opened the floor for public comment.

Stakeholder Jane Wooster asked whether the model is more accurate for small irrigators with fewer wells. Mr. Van Lienden responded that single-well fields provide clearer location data, whereas larger farming units with multiple wells introduce more estimation uncertainty.

Chair Kelly asked whether the DWR comments would be reviewed by the Technical Forum. Mr. Blakslee responded that staff does not plan to convene the Technical Forum because the responses largely clarify existing work rather than develop new technical approaches.

Committee Member Gaillard asked whether DWR oversees Groundwater Sustainability Plan governance or Board composition and expressed concern about local representation. Mr. Blakslee responded that DWR focuses on Sustainable Groundwater Management Act (SGMA) compliance and public agency requirements and would not weigh in on Board membership decisions.

b. Discuss and Take Appropriate Action on Potential Areas of Overdraft Outside the Central Management Area

Ms. Bianchi provided background on the Board's prior direction to evaluate potential increased pumping outside the Central Management Area (CMA). She explained that the initial assessment includes groundwater pumping, groundwater levels, and land use and well permitting data.

Mr. Blakslee stated that the goal is to identify significant changes that may warrant further investigation, rather than make immediate sustainability determinations. He noted that land use and well permit data are still being compiled from the counties.

Chair Kelly commented on Well 99 and expressed concern that the annual groundwater level change map may not reflect longer-term declines shown in the hydrograph. He stated that a 50-foot increase year-over-year does not fully capture an 80-foot decline followed by partial recovery.

Mr. Van Lienden responded that the map reflects year-to-year change based on measured groundwater levels. He noted that other basins often use model-based groundwater change maps rather than measured data.

Committee Member Jaffe stated that comparing only two years of data can be misleading, particularly when rainfall varies significantly between years. She recommended reviewing longer-term trends before drawing conclusions.

Mr. Blakslee responded that this evaluation is intended as an initial screening tool and that additional analysis would follow if conditions warrant further review.

Stakeholder Byron Albano commented that annual groundwater level fluctuations outside the CMA are common and should not automatically be interpreted as overdraft. He encouraged maintaining that distinction when presenting data.

Ms. Bianchi confirmed that land use and well permit data will be incorporated into the next update of the assessment.

c. Discuss and Take Appropriate Action on FY 2026-2027 Strategic Plan and Budget Components

Mr. Blakslee provided an overview of the proposed budget components and explained that the SAC is being asked for high-level feedback before staff prepare cost estimates. He clarified that inclusion on the list does not commit the Board to funding but signals that pricing should be developed.

Chair Kelly reminded the Committee that budget adoption is a Board responsibility and encouraged comments to remain at a strategic level.

Mr. Blakslee continued to review the budget components.

Chair Kelly referenced DWR's comments regarding allocations beyond 2029 and questioned whether future allocation updates should be planned regardless of adjudication status. Mr. Van Lienden responded that DWR requested confirmation of the plan to continue allocations and that the Board has previously directed model updates at least every five years.

Committee Member Jaffe asked about the adjudication line item and whether allocation policy updates, including carryover and exchange provisions, would be included. She emphasized the importance of these policies for small farmers and supported pricing them for consideration.

Committee Member DeBranch commented that past budgets relied heavily on grant funding and stated that, in its absence, the GSA should prioritize essential data collection and regulatory compliance.

Chair Kelly asked whether staff had considered pulling water quality sampling data from the Irrigated Lands Program, noting that Jim Wegis had previously mentioned growers are required to submit sampling data that may overlap with GSA requirements.

Stakeholder Byron Albano responded that agricultural wells already submit water quality data through the Irrigated Lands Program and suggested the GSA explore accessing that data to supplement the monitoring network and avoid duplicative reporting costs.

d. Discuss and Take Appropriate Action on Water Year 2024-2025 Annual Report

Mr. Van Lienden reported that the Water Year 2024-2025 Annual Report must be submitted to DWR by April 1, 2026. He summarized key components, including data and model updates, estimated groundwater extractions, change in groundwater storage, updated groundwater conditions, and salinity conditions.

Committee Member Jaffe asked whether the net reduction in groundwater storage in 2025 is concerning. Mr. Van Lienden responded that a drier year combined with additional pumping resulted in reduced storage, but long-term trends remain within expected variability.

MOTION

Committee Member Jaffe made a motion to approve the annual report. The motion was seconded by Committee Chair Kelly. A roll call vote was made, and the motion passed.

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

Technical Updates

a. Update on Groundwater Sustainability Plan Activities

Mr. Van Lienden reported that GSP activities update is provided in the SAC packet and reported that the fault investigation study.

b. Update on Grant-Funded Projects

Mr. Van Lienden reported that the updates on the grant-funded projects, which is provided in the SAC packet.

c. Update on Groundwater Conditions Report

Mr. Van Lienden reviewed the quarterly groundwater conditions report for January 2026.

8. Administrative Updates

a. Report of the Executive Director

Nothing to report.

b. Report of the General Counsel

Nothing to report.

c. Report on 2025 Basin-wide Groundwater Use, 2025 CMA Allocation Compliance, and Groundwater Allocation Exchanges

Mr. Blakslee reported that there are three landowners to provide the pumping data, however the total extraction has decreased from 2024.

Committee Member DeBranch commented on the discrepancy between modeled and reported pumping trends. Mr. Blakslee clarified the difference in reporting periods.

Mr. Blakslee reviewed 2025 CMA allocation compliance and noted that two landowners exceeded their allocations.

Stakeholder Joe Haslett commented that minor allocation exceedances should be considered in context.

Committee Member Jaffe noted that 58 percent of allocations were used and suggested unused allocations may provide flexibility for small farmers.

Committee Member DeBranch stated that the unused allocation gap is expected to narrow under the glidepath.

Committee Member Lewis asked about the process for water allocations.

d. Board of Directors Agenda Review

Ms. Bianchi briefly reviewed the March 4, 2026, CBGSA Board Meeting agenda, which is provided in the SAC packet.

9. Items for Upcoming Sessions

Committee Member Jaffe requested additional information regarding the adjudication process at a future meeting.

10. Committee Forum

Nothing to report.

11. Correspondence

There was no correspondence.

12. Adjourn

Chair Kelly adjourned the meeting at 8:56 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. 8a

FROM: Taylor Blakslee

DATE: April 30, 2026

SUBJECT: Discuss and Take Appropriate Action on Potential Areas of Overdraft Outside the Central Management Area

Recommended Motion

SAC feedback requested.

Discussion

An update on the initial assessment of potential overdraft areas outside the Central Management Area is provided in ~~Attachment 1~~.

This item will be provided on Tuesday, April 28, 2026.



TO: Standing Advisory Committee
Agenda Item No. 8b

FROM: Taylor Blakslee

DATE: April 30, 2026

SUBJECT: Discuss and Take Appropriate Action on GSA Response to DWR's Additional Information Request Regarding their Review of the Amended 2025 GSP and Periodic Evaluation

Recommended Motion

Recommend the CBGSA Board submit the GSP responses to DWR.

Discussion

On January 9, 2026, the California Department of Water Resources (DWR) issued a letter requesting additional information as part of its review of the Cuyama Basin Groundwater Sustainability Agencies' 2025 Periodic Review and amended Groundwater Sustainability Plan (GSP) with a due date of July 31, 2026.

On February 6, 2026, a board ad hoc (Directors Anselm, Bantilan, Jackson, Yurosek, Williams) met with staff and DWR to review and discuss DWR's information request. Following that meeting, staff developed responses to DWR's questions in the form of a technical memo which was reviewed with the ad hoc. A summary of DWR's questions and the CBGSA response is provided as **Attachment 1**, and the detailed technical memo to be considered for submission to DWR is provided as **Attachment 2**.

Staff is seeking feedback from the Standing Advisory Committee to inform the Board on these draft responses prior to submittal to DWR.

Cuyama Basin Groundwater Sustainability Agency

Discuss and Take Appropriate Action on GSA Response to DWR's Additional Information Request Regarding their Review of the Amended 2025 GSP and Periodic Evaluation



Background

- On January 9, 2026, the Department of Water Resources issued a letter requesting additional information as part of its 2025 Periodic Review of the Cuyama Valley Basin.
- On February 6, 2026, a board ad hoc (Directors Anselm, Bantilan, Jackson, Yurosek, Williams) met with staff and DWR to review a summary presentation of the letter and additional information requests.
- On April 2, 2026, the board ad hoc met again with DWR to discuss DWR's requests on water quality
- Staff has worked with the ad hoc to develop the draft technical memorandum that includes the requested information
- A final responses from the CBGSA needs to be submitted to DWR by their requested deadline of July 31, 2026.

1. Groundwater Levels SMCs

DWR's Request:

- Explain how undesirable result (UR) definition is protective of beneficial users, what new information was used to update minimum thresholds (MTs), how the well protection method and GDE protection methods were applied to develop updated MTs and how they are protective of GDEs, how changes to MTs will not impact other sustainability indicators, how new information warrants changes to the MTs, and how updated interim milestones (IMs) and measurable objectives (MOs) were developed.

CBGSA Response:

- The UR definition allows the CBGSA the flexibility to identify the cause of MT exceedances and to develop a plan for response per the Adaptive Management approach described in the GSP.
- Previous MT methodology was based on limited data and was overly conservative relative to active well locations and well construction data that is now known and analyzed
- The updated methodology is more reflective of actual Basin conditions
- The TM provides a summary of the updated data available and of the well protection depth and GDE protection depth method and how these were used to develop updated MTs, as well as the methodology for developing IMs and MOs

2. Groundwater Quality: TDS

DWR's Request:

- Explain how undesirable result (UR) definition will not cause significant and unreasonable impacts, how new information warrants changes to the SMCs, and how updated SMCs were developed.

CBGSA Response:

- The UR definition allows the CBGSA the flexibility to identify the cause of MT exceedances and to develop a plan for response per the Adaptive Management approach described in the GSP
- The water quality SMCs in the 2020 GSP were developed based on limited data; additional measurements at each well warranted an update to the SMCs to ensure they are appropriate

3. Groundwater Quality: Nitrate and Arsenic

DWR's Request:

- Provide updates on progress towards development of SMCs for nitrate and arsenic and on the status of the new CCSD well

CBGSA Response:

- Provided a summary of how the CBGSA actively manages for nitrate and arsenic
- Provided an update on the new CCSD well (expected in 2027)
- If there is a significant change in nitrate or arsenic concentrations, the CBGSA will evaluate potential mitigation measures

4. Land Subsidence

DWR's Request:

- Explain impacts related to subsidence, including how the basin will be achieve the measurable objective of zero subsidence, how the amount of total cumulative subsidence which will avoid significant and unreasonable impacts, and how a minimum threshold of 2 inches per year continues to be reasonable.

CBGSA Response:

- The current MT provides an adequate indicator of potential subsidence issues while allowing the Basin operational flexibility
- There is a lack of critical infrastructure in the Basin
- There has been little to no subsidence in recent years
- If measured subsidence increases, the CBGSA will consider additional technical analyses in the future

5. Monitoring

DWR's Request:

- Clarify how missed measurements are factored when determining an undesirable result, reconcile the list of wells and provide the list of TDS water quality RMS wells, and provide a schedule for migrating new wells to become representative monitoring sites

CBGSA Response:

- When developing groundwater conditions reports, if a site is missing a measurement an analysis is performed to assess whether the site has likely exceeded the MT during the missing period.
- An updated list of representative wells was provided to correct for a discrepancy in the GSP.
- A discussion and schedule are provided for the incorporation of new wells into the representative monitoring network.

6. Plan Implementation

DWR's Request:

- Provide target vs. actual allocation data through WY 2024, confirm the baseline, and provide details on annual allocation targets through 2040

CBGSA Response:

- CMA allocations and actual pumping were provided for 2023-2025
- The Baseline for determining allocations was updated due to the model update and re-calibration
- CMA allocations are being implemented on schedule and will bring pumping to the sustainable yield level by 2038

7. Data Reporting

DWR's Request:

- Provide measured extraction data for WY 2020–2024 and justify the use of modeled data over metered data.

CBGSA Response:

- The CBGSA uses both metered landowner-reported data and model estimated data for different purposes
- Landowner-reported data is available from 2022 onwards
- The model is used to estimate extractions for the historical period (1998-2025) and for the future projected period

TECHNICAL MEMORANDUM

TO: Roy Hull, California Department of Water Resources (DWR)

CC: Monica Salais, DWR

PREPARED BY: Brian Van Lienden and Micah Eggleton, Woodard & Curran

REVIEWED BY: Jim Blanke, Woodard & Curran and Taylor Blakslee, The Hallmark Group

DATE: April 23, 2026

RE: Additional Information for the Cuyama Valley Basin 2025 Periodic Review - DRAFT

In 2017, in response to the Sustainable Groundwater Management Act (SGMA), the Cuyama Basin Groundwater Sustainability Agency (CBGSA) was formed. The CBGSA is a joint-powers agency that is comprised of Kern, Santa Barbara, San Luis Obispo and Ventura counties, the Cuyama Community Services District and the Cuyama Basin Water District. The CBGSA is governed by an 11-member Board of Directors.

SGMA requires that the CBGSA develop a Groundwater Sustainability Plan (GSP) that achieves groundwater sustainability in the Cuyama Basin (Basin) by the year 2040. The Cuyama Basin GSP was adopted on December 4, 2019 by the CBGSA Board and submitted to DWR on January 28, 2020. On January 21, 2021, DWR determined that the GSP was "incomplete" and recommended that the CBGSA amend the GSP to address four corrective actions. To address these corrective actions, CBGSA developed supplemental sections to the GSP and resubmitted to DWR on July 18, 2022. On March 2, 2023, DWR announced that the Revised GSP had been Approved.

Section 355.6 of the SGMA Regulations requires a Periodic Evaluation (PE) every 5 years after submittal of the original GSP. DWR evaluates the PE, annual reports, and latest GSP to assess whether the Plan as implemented remains consistent with the SGMA Regulations and is being implemented in a manner that will likely achieve the sustainability goal for the Basin. In January 2025, the CBGSA adopted and submitted an updated 2025 Cuyama Valley Basin Groundwater Sustainability Plan (2025 GSP) and an accompanying 2025 PE.

On January 9, 2026, DWR sent a letter to the CBGSA requesting additional information to help in their evaluation of the 2025 GSP and 2025 PE. The information requested includes:

1. *Groundwater Levels (GWL) Sustainable Management Criteria (SMC)*
 - **SMC update justification:** Provide justification for the change in minimum thresholds, measurable objectives, and interim milestones for groundwater levels.
 - **Minimum thresholds:** Provide a discussion of how the updated minimum thresholds may impact beneficial uses and users.

- **Relationship with other sustainability indicators:** Provide information regarding the relationship or effects the groundwater level minimum thresholds have with other sustainability indicators.
 - **Measurable objectives and interim milestones:** Provide details regarding the process of establishing measurable objectives and interim milestones.
2. *Groundwater Quality: Total Dissolved Solids (TDS)*
 - **Significant and unreasonable effects:** Explain how undesirable result definition of two years will not cause significant and unreasonable impacts to beneficial uses and users.
 - **SMC update justification:** Provide justification on why it was necessary to update the water quality minimum thresholds.
 - **Minimum thresholds:** Provide a discussion of how the updated minimum thresholds may impact beneficial uses and users.
 3. *Groundwater Quality: Nitrate and Arsenic*
 - **SMC development:** Provide justification for not establishing SMCs.
 4. *Land Subsidence*
 - **Minimum thresholds:** Clarify and justify the current minimum threshold that appears to have an incremental 2 inches per year increase.
 - Identification of critical infrastructure.
 5. *Monitoring*
 - **Coverage and measurements missed:** There are water quality (arsenic and nitrates) monitoring coverage concerns and how the missed measurements for groundwater levels were considered for identifying undesirable results.
 6. *Plan Implementation*
 - **Management Action 2 – pumping allocations:** Clarify the timelines and the specific actions the GSA plans to take if it does not meet its allocation targets.
 7. *Data Reporting*
 - **Extraction reporting:** Clarify and justify the use of modelled data over metered extraction data and reporting periods, i.e., water year, calendar year.

After transmitting the request, DWR held two meetings with the CBGSA to discuss the information request and to provide clarification and context on its questions pertaining to the 2025 GSP and 2025 PE. During these meetings, DWR provided more specific requests for each of the above categories; the more detailed requests are provided at the top of each section below. This memorandum is intended to provide the information requested by DWR in the January 2026 letter and in the subsequent DWR-CBGSA meetings.

1. GROUNDWATER LEVELS SUSTAINABLE MANAGEMENT CRITERIA

Request:

- A. Provide a detailed explanation for how the groundwater level (and water quality) quantitative definition is to be used to monitor conditions and determine when an undesirable result has occurred. Explain any differences between two years and 24 months. Clarify and provide assurances that future adaptive management actions include sufficient details of the triggering event(s), investigations and their results, and specific actions that were taken.
- B. Explain how the current quantitative definition for an undesirable result is protective of beneficial uses and users. ^{23 CCR § 354.26(b)(3)}
- C. Clarify what new information was used and provide a detailed explanation on how this new information warranted changes to the sustainable management criteria for groundwater levels.
- D. Provide a detailed explanation of how the well protection minimum threshold method was applied for each RMS. What was the criteria for identifying the well(s) being considered at individual well protection RMS? If there were multiple wells (types) that needed to be protected by a single RMS, how were they processed and what is their relationship to the MT?
- E. Provide a detailed explanation of how the Well and GDE Protection interpolated surface was created and of how the interpolated surface was used to determine the sustainable management criteria (i.e., minimum thresholds). Provide a discussion on any expected impact on beneficial users (i.e., dry wells) because of the updated minimum thresholds.
- F. Explain how the GDE protection wells minimum thresholds were established deeper than the protection depth of 30 feet bgs and explain how these deeper levels are protective of GDEs.
- G. Explain how the individual methods were selected for each RMS and how the different methods may interact with each other across the basin. ^{23 CCR § 354.28(b)(1) and (4)}
- H. Provide a detailed explanation of how the changes to the groundwater level sustainable management criteria will not have an impact on other sustainability indicators (i.e., subsidence, depletion of groundwater storage, water quality, and depletion of interconnected surface water). ^{23 CCR § 354.28(b)(2)}
- I. Provide the metric and associated data used to determine groundwater level interim milestones and measurable objectives. ^{23 CCR § 354.30(b), 23 CCR § 354.30(e)}

1.1 Explain Undesirable Results Definition for GWLs and GWQ (Requests A and B)

Groundwater levels and quality have similar undesirable results definitions. As outlined in the 2025 GSP in Sections 3.2.1 and 3.2.4, the undesirable result definitions for the chronic lowering of groundwater levels and groundwater quality are intended to reflect Basin conditions that cause significant and unreasonable reduction in the long-term viability of domestic, agricultural, municipal, or environmental uses over the planning and implementation horizon of this GSP.

Groundwater level undesirable results and groundwater quality undesirable results occur during GSP implementation when 30 percent of representative monitoring wells fall below their minimum groundwater elevation thresholds for 24 consecutive months. Note that while the GSP states either two consecutive years or 24 consecutive months in various locations, it is intended to mean 24 consecutive months in all cases for

purposes of Basin management. For both groundwater levels and quality, the 2025 GSP requires a well to exceed the minimum threshold during all measurements that occur during that 24-month period in order to be counted towards an undesirable result.

The 30 percent of wells exceeding their minimum threshold (MT) for 24 consecutive months criteria included in the GSP allows the CBGSA the flexibility to identify the cause of MT exceedances and to develop a plan for response (per the Adaptive Management approach described in GSP Section 7.6). Potential causes of MT exceedances could include:

- Prolonged drought;
- Pumping nearby the representative well; and
- Unreliable and non-representative data used to calculate the MT.

Minimum threshold exceedances for groundwater levels (GWLs) in multiple wells are considered more indicative of a basin-scale decline in groundwater levels and potential adverse impacts on groundwater infrastructure, as opposed to more localized groundwater level declines, which could be associated with nearby pumping. Note that a similar discussion for groundwater quality (GWQ) can be found below in Section 2.1. Furthermore, groundwater levels in areas of the Basin change in response to climatic conditions and therefore sustained exceedances of minimum thresholds are considered to be more significant than short-term exceedances. Setting the Identification of Undesirable Results criteria at 30 percent or more of wells exceeding their MT is intended to reflect undesirable results at the basin-scale and using 24 consecutive months allows the CBGSA time to address issues, perform investigations, and implement projects and management actions as needed.

Four times a year, the CBGSA develops a quarterly Groundwater Levels Conditions Report to track the status of each representative well as compared to minimum thresholds and track the age of each exceedance. It provides summary statistics for the status of the Basin relative to the Sustainable Management Criteria (SMC) metrics. An annual Groundwater Quality Conditions Reports is developed to report similar information for water quality monitoring. These reports are provided to the CBGSA Board and made publicly available via the Cuyama Valley Groundwater Basin website (<https://www.cuyamabasin.org/>) and are used to help make management decisions and identify when adaptive management actions may be necessary in response to MT exceedances.

Section 7.6 of the 2025 GSP describes the CBGSA's approach to adaptive management, which is triggered if impacts to beneficial uses or users is reported, if the pumping reductions are more than five percent off the glide path, or if there are trends towards undesirable results conditions. As noted in the Water Year (WY) 2024-2025 Annual Report, the CBGSA has recently established new standard operating procedures for the adaptive management process that outlines steps that the CBGSA would take to investigate the cause of changing conditions and develop adaptive management strategies for Board consideration. The procedures include forming an ad-hoc committee, performing an investigation, developing draft adaptive management response strategies, and implementing potential response strategies to correct the change in Basin conditions. These procedures have recently been applied to evaluate conditions at wells that have exceeded minimum thresholds in the past year. The CBGSA intends to continue to apply its adaptive management procedures when exceedances occur in the future.

1.2 What New Information was Used to Change GWL SMCs (Request C)

At the time that the 2020 GSP was developed, the CBGSA had insufficient information regarding the locations active pumping wells and their associated construction data to adequately identify the appropriate depths needed to protect groundwater pumpers in the Basin. Because of this, the 2020 GSP utilized a simplified approach based largely on historical groundwater elevation data to develop minimum thresholds. Since the 2020 GSP was submitted, the CBGSA has conducted significant data collection efforts that greatly improved the understanding of the inter-relation between groundwater levels in the Basin and their effect on beneficial uses and users. The new information that has been collected since the adoption of the 2020 GSP includes:

1. Groundwater level data - as part of GSP implementation, groundwater levels data has been collected quarterly from Representative Monitoring Wells (RMWs) and other monitoring wells by the CBGSA.
2. Groundwater quality data – as part of GSP implementation, groundwater quality data has been collected annually from RMWs by the CBGSA, supplemented by data collected by the Irrigated Lands Program and other programs available through the Groundwater Ambient Monitoring and Assessment (GAMA) and GeoTracker.
3. Subsidence data – as part of GSP implementation, subsidence data has been collected for RMW sites and neighboring sites to track vertical displacement of the ground surface. In addition, TRE Altamira data is also analyzed on an annual basis for the Annual Report.
4. Faulting and subsurface data – the CBGSA has conducted fault investigation studies to better understand the location and depth of the Russell and Santa Barbara Canyon Faults, has utilized data provided by DWR’s Airborne Electromagnetic (AEM) survey of the Cuyama Basin, and has processed and analyzed bore log data from several wells including several new wells drilled during GSP implementation.
5. Pumping data – Since 2022, the CBGSA has collected metered pumping data from groundwater users in the Basin and has utilized this data to track extractions, monitor compliance with pumping allocations and to validate and update the groundwater model.
6. Active and inactive well information – a comprehensive survey was conducted to categorize all pumping wells in the Basin as active (and therefore part of Basin related analyses) or inactive. This effort incorporated critical stakeholder feedback to develop a list of active wells that was as accurate and comprehensive as possible. This effort also included the solicitation of construction information for all active wells. The CBGSA facilitated collection of data from stakeholders and well operators, who continue to provide information on an ongoing basis. This is described in more detail in the following subsection.
7. Cuyama Basin Water Resources Model (CBWRM) update and re-calibration – the CBGSA performed an update and recalibration of the groundwater model in advance of the 2025 GSP Update that utilized the new data described above. The updated modeling results also included analysis to assess a variety of management approaches including pumping allocations.
8. Groundwater Dependent Ecosystem (GDE) locations and depths – additional analysis was conducted to assess the GDE locations and depths throughout the Basin in the context of groundwater levels minimum thresholds to ensure their protection as a beneficial user of groundwater.

9. Stakeholder feedback and information – the CBGSA continues to engage with Basin stakeholders for feedback, information and data that may be of use to ensure the protection of beneficial uses and users of groundwater within the Basin.

1.2.1 Additional Information on Identification of Active and Inactive Pumping Wells

The CBGSA is confident in its ability to protect all beneficial uses and users in the Basin because of recent efforts to identify all active and inactive pumping wells in the Basin. In 2022 and 2023, a survey of active pumping wells was conducted to identify all known wells in the Basin and categorize them as either an active status where they would be protected or an inactive status where they could be removed from analysis processes related to beneficial uses and users.

To determine if a well was inactive or active, the CBGSA evaluated:

- Information provided during the development of the GSP including locations and construction data for many existing wells, collected monitoring data, newly published reports and studies, etc.
- Well metering program information including which wells have been metered and additional construction information about those wells.
- Well survey information from a Basin-wide survey of all Basin landowners to solicit information on Basin pumping wells and to update and correct information available to the CBGSA regarding which wells were active or inactive.
- De minimis user reporting which included active or inactive statuses of these wells and construction information.
- Other miscellaneous information provided to the CBGSA via conversations, email communications, etc.

The resulting active and inactive well list was posted on the CBGSA website here: <https://www.google.com/maps/d/u/2/edit?mid=1AGTzyBEfP-AGvFwyMmZCx-4eoc995mY&usp=sharing>

Landowners and other stakeholders in the Basin were given the opportunity to review and provide feedback to confirm that wells were correctly identified as active or inactive. The CBGSA continues to welcome updates and feedback on the active well list to ensure that the information is accurate and up to date.

This information was utilized by the CBGSA to evaluate the effectiveness of the groundwater level SMCs included in the 2020 GSP. A review of the available data indicated that in most cases the MTs developed by the approach used in the 2020 GSP were more conservative than what is actually required to protect beneficial uses and users in the Basin from a potential loss of groundwater supply. MTs approved and included in the 2020 GSP were often higher (more protective) than the MTs established in the 2025 GSP because during the development of the 2020 GSP the CBGSA wanted to take an overly cautious approach in protecting all beneficial uses and users, and therefore with the limited data available at the time resulted in MTs more conservative than necessary. Therefore, for the 2025 GSP the CBGSA developed a more robust approach for development of groundwater levels minimum thresholds that utilized all of the available data to develop updated SMCs that more accurately represent conditions in the Basin and better reflect the

groundwater levels required to protect beneficial uses and users. The updated approach is described in the following sections.

1.3 Explain Well Protection Depth, How it was Applied to All Wells, and Explain How the Well Protection Depth Interpolated Surface Was Created / Used (Requests D and E)

For the 2025 GSP, the CBGSA developed an updated and improved methodology to develop minimum thresholds at representative monitoring wells that utilizes the additional data and information that was available (as described above) and that better reflects the actual potential impacts to beneficial uses and users in the Cuyama Basin, including domestic and other pumping wells and GDEs. The primary tools used to assess potential impacts to groundwater pumpers and GDEs are the Well Protection Depth and GDE Protection Depth, in which the groundwater level depths required for pumping wells and GDEs are combined into a single interpolated surface to develop a composite protection depth at each representative monitoring well. As part of the method, all representative monitoring wells are assigned a Well Protection Depth (WPD) based on the actual or estimated (estimates are based on regional mean pump depth of known pump depths) pump depth for each nearby pumping well and an assumed need to maintain water levels at 30 ft below ground surface (bgs) in all areas identified as potential GDEs. Using Geographic Information System (GIS) interpolation, these values are combined across the entire Basin to create a single interpolated layer (much like a topographic coverage of the Basin) that represents a combined WPD and GDE protection layer.

The resulting raster of the combined WPD and GDE Protection Depth was reviewed by staff to ensure that there were no unreasonable interpolation surfaces due to drastically different depths at control points that would lead to an inappropriate WPD being estimate at a particular well location. For example, nowhere in the Basin was there a GDE protection depth adjacent to an active well with a WPD of several hundred feet below ground surface that would cause the rasterized surface to produce a “cliff” or steep and unrealistic drop in the raster surface. The raster surface was thoroughly reviewed to ensure that control points did not unrealistically conflict and create an output that would cause unrealistic outputs. The following provides additional details about how the Well Protection Depth and GDE Protection Depth are applied:

1. **Well Protection Depth:** The well protection depth is used to ensure that active production and domestic wells within the Basin are protected from significant and unreasonable harm to their beneficial uses. The well protection depth is a numerical value representing the approximate depth at which, if exceeded, beneficial uses could be impacted in an active pumping well. This value is unique, calculated for each active production and domestic well within the Basin where there is available data. Where data is not available, generalized or regional proxy data is utilized. All wells that are in the vicinity of agricultural or municipal development within the Basin are protected by the RMN; some wells are screened from the analysis because of local conditions (such as geology or topology) or because the wells were determined to be already dry in 2015. The well protection depth is calculated for each pumping well as a four-part stepwise function, with a slight difference in the fourth step between domestic and production wells, as shown in **Figure 1-1**.
2. **GDE Protection Depth:** All potential GDE locations in the Basin were assigned a protection depth of 30 ft bgs via a dense spatial point-cloud within each GDE polygon in GIS. The point-clouds allow

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

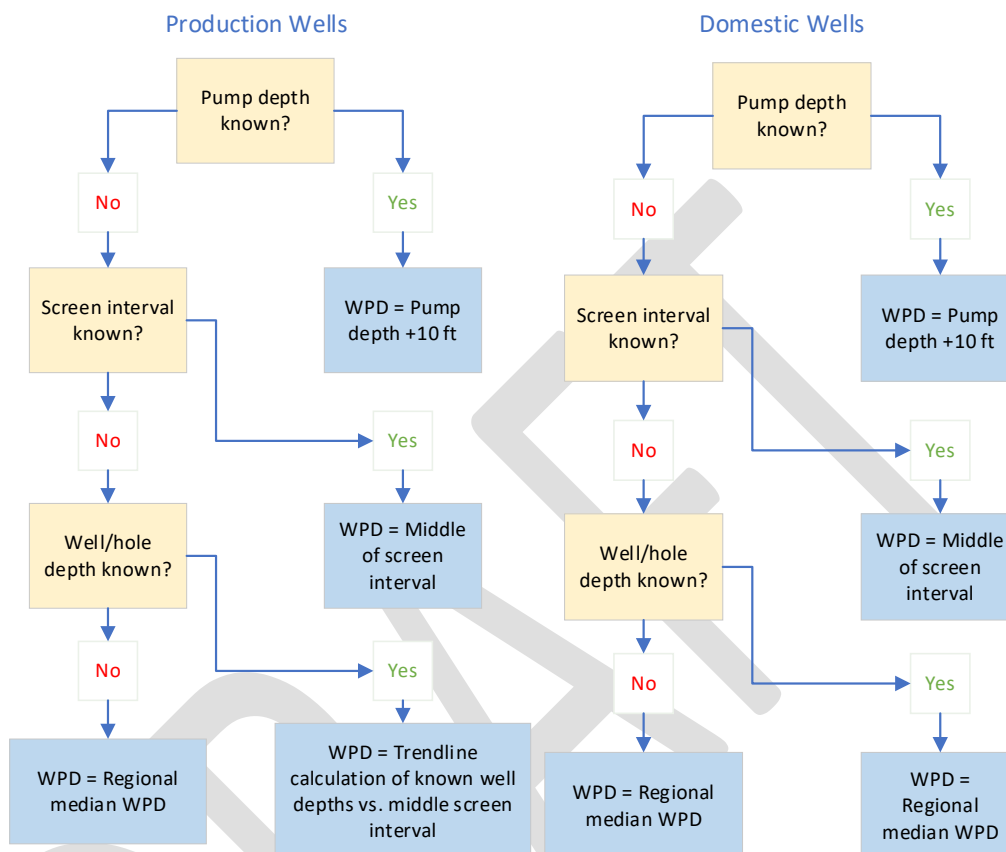


Figure 1-1: Well Protection Depth Computation for Production and Domestic Wells

A simplified hypothetical example of the process to create and apply the WPD and GDE protection GIS surface is presented in **Figure 1-2**. In this example, only active wells are shown along with a potential GDE area. Each blue shaded well is an active production or domestic well, with the green star representing the calculated WPD. Where the potential GDE area is located, a 30-foot depth was established as the GDE protection depth. Using GIS interpolation, a raster surface is generated represented by the dark red dotted line. Where the interpolated surface intersects with RMWs, the WPD is established for those wells. As an example, **Figure 1-3** shows three RMWs (Opti 91, 95, and 610), with the nearby pumping wells and the elevations of their associated estimated pump depths that contributed to development of the GIS raster that determined the WPDs. The resulting WPDs at these wells are 625, 573, and 704 ft below ground surface, respectively.

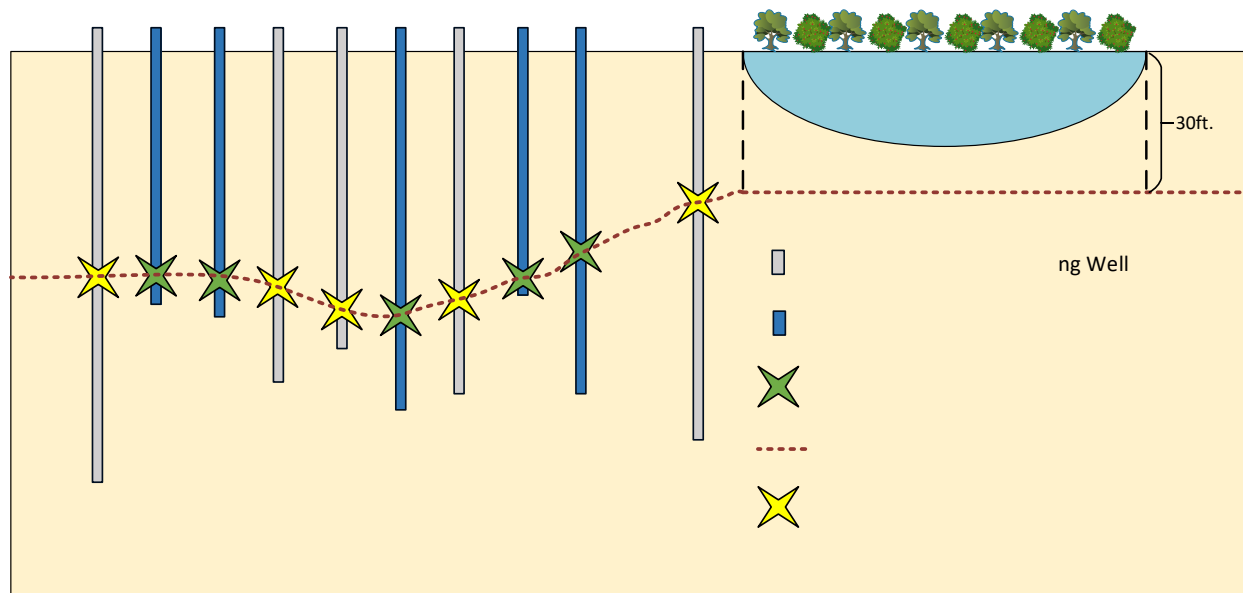


Figure 1-2: Example WPD and GDE Protection Depth Interpolation

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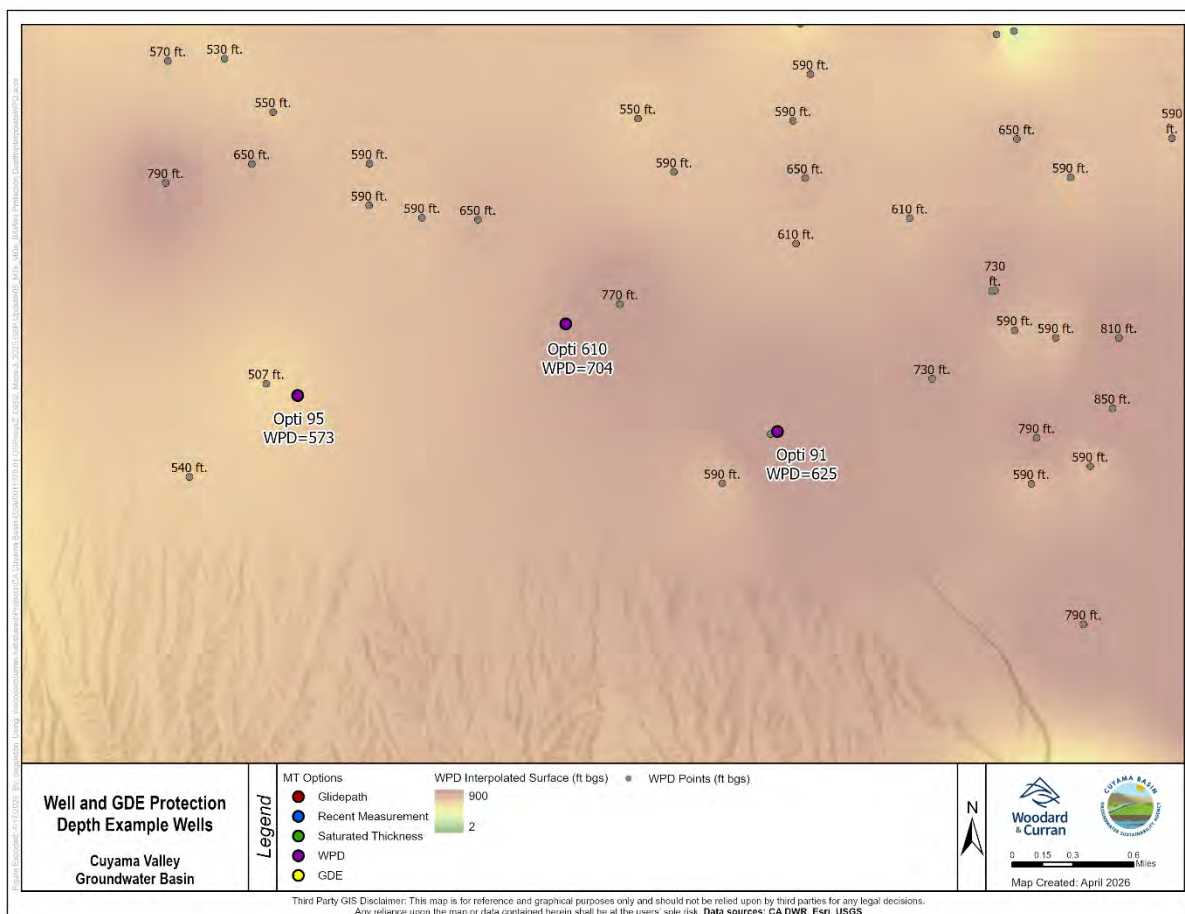


Figure 1-3: Determination of Well Protection Depths at Opti Wells 91, 95 and 610

By utilizing the combined WPD and GDE Protection Depth in the stepwise function (described below) for calculating the MTs, no undesirable results are expected for beneficial uses and users. Because the stepwise function method sets all MTs at levels that are no deeper than the WPD and GDE Protection Depth at each RMW, all known production and domestic wells and GDEs are protected by the final calculated MTs.

1.4 Explain How the GDE Protection Wells MTs Were Established Deeper than 30 ft bgs (Request F)

Because the WPD and GDE protection depth are assessed in a combined technical approach, the CBGSA had to use professional judgment to identify wells classified as “GDE wells” specifically as opposed to those classified as “WPD wells”. For this purpose, all wells that 1) had the resulting MT was based on the WPD and GDE protection depth calculation, and 2) were within 0.5 miles of a GDE were labeled as having the GDE protection depth as its MT methodology. Conversely, any well that had the resulting MT based on the WPD and GDE protection depth calculation and was greater than 0.5 miles from a potential GDE were labeled with the WPD methodology for the calculated. There were five such wells that were designated as GDE wells in the 2025 GSP, which are shown in **Table 1-1**.

The GIS raster that was developed to ensure protection for GDEs at these wells was based on groundwater elevations that were 30 feet below the ground surface elevation at each GDE location. However, the MT was calculated to be greater than 30 feet bgs at all five well locations. These differences occur because subsurface water table elevations are often subdued expressions of topography (and influenced by many other factors) and the interpolated WPD and GDE protection depth is also a horizontally and vertically dynamic surface that takes into account the GDE protection depth of 30 feet and other data input that influence its vertical distribution. In each case, this is because the representative monitoring well is at a higher elevation than the nearby GDEs. As shown in **Table 1-1**, the five GDE wells are between 19 and 29 feet higher than the nearby GDE locations. If these differences in ground surface elevations are subtracted from the MT, the effective depth of the MT relative to the GDEs is less than 30 feet at four of the five GDE wells. The one exception is at well 830, where the difference is 34 feet; however, this well is more than 2,000 feet away from the closest GDE location and it would not be expected that a drawdown to 34 feet bgs would be representative of a 30-foot drawdown at that distance.

Table 1-1. Wells Using the GDE Protection Depth as the Calculated MT Value

Representative Well	Minimum Threshold (feet below ground surface)	Distance from closest GDE (feet)	Difference between GSE at Well and GDE locations (feet)
2	52	1,920	25
568	37	13	19
830	63	2,126	29
832	50	620	22
833	48	500	23

1.5 Explain How MT Methods Were Selected for Each RMW and How They May Interact with One Another Across the Basin (Request G)

As described in the 2025 GSP, the minimum threshold calculation uses a stepwise function that applies a rigorous analytical approach to determine the groundwater depths needed to protect wells (production and domestic) across the Basin while providing flexibility, where needed, to accommodate the CBGSA planned pumping allocations and reductions strategy. The stepwise function has the following four potential calculation outcomes:

1. Combined well protection and GDE protection depth: As discussed in the section above, the well protection depth and GDE protection depth were merged together in a GIS analysis process that interpolated the data into a 3-dimensional coverage across the Basin, in the same process elevation points make a topographic map of the surface elevation. For each RMW's location, the interpolated protection depth was then extracted to get the final Well Protection / GDE protection depth value.
2. Recent deepest measurement plus 10 ft or 5% buffer (whichever is greater): Historical data for the last ten years (2013-2023 based on the timing of the development of this methodology) was analyzed to find the deepest depth to water during that period. A buffer of the greater of either 10 ft or 5% of the depth to water value was then added to the deepest depth. This methodology helps utilize, where appropriate, historical and recently collected data that captures both wet and dry

periods. This criterion allows for the flexibility for regions of the Basin that experience significant drawdown and recovery during dry and wet hydrologic cycles to manage those variations in groundwater elevation.

3. Projected depth to water in 2040 based on modeled glide path: The CBWRM (updated in 2024) was used to project the depth of water in 2040 based on the CBGSA's planned allocation and glidepath pumping reductions. In regions of the Basin where there is significant pumping, this allows for groundwater levels to decline to where the model predicts they will be in 2040 given the anticipated schedule for pumping reductions.
4. Saturated thickness in areas of greater geologic understanding: This strategy is based on a technical analysis¹ performed specifically for the region in the vicinity of the two RMWs in the northwestern portion of the Basin. The method uses an estimated 15 percent of the total average saturated thickness for the primary storage area in the vicinity of the localized region. As discussed in the 2025 GSP, additional analysis has also been conducted by the CBGSA to ensure that the calculated MTs in this area do not impact beneficial uses or uses at any nearby active wells or potential GDEs.

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

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

As mentioned before – each well utilizes the stepwise function. The four stepwise function outcomes are not assigned to each RMS by independent choice, rather, the data for each well is assembled and then an excel sheet is used to calculate each of the four options, then run through the stepwise algorithm to produce the resulting MT. It should be noted that because the MT is equal to the shallower of the WPD/GDE Protection Depth and the other potential methods, it is ensured by the method that the MT will always be no deeper than the WPD/GDE Protection Depth and therefore the pumpers and GDEs should always be protected by the resulting MTs.

¹ <https://cuyamabasin.org/assets/pdf/Cleath-Harris-Sustainability-Thresholds-for-Northwestern-Region.pdf>

Figure 1-4 shows an example area within the Cuyama Basin showing the categories of MT methodologies that were binding for each representative monitoring network (RMN) wells. Within the map, potential GDE areas and the interpolated WPD surface are also shown.

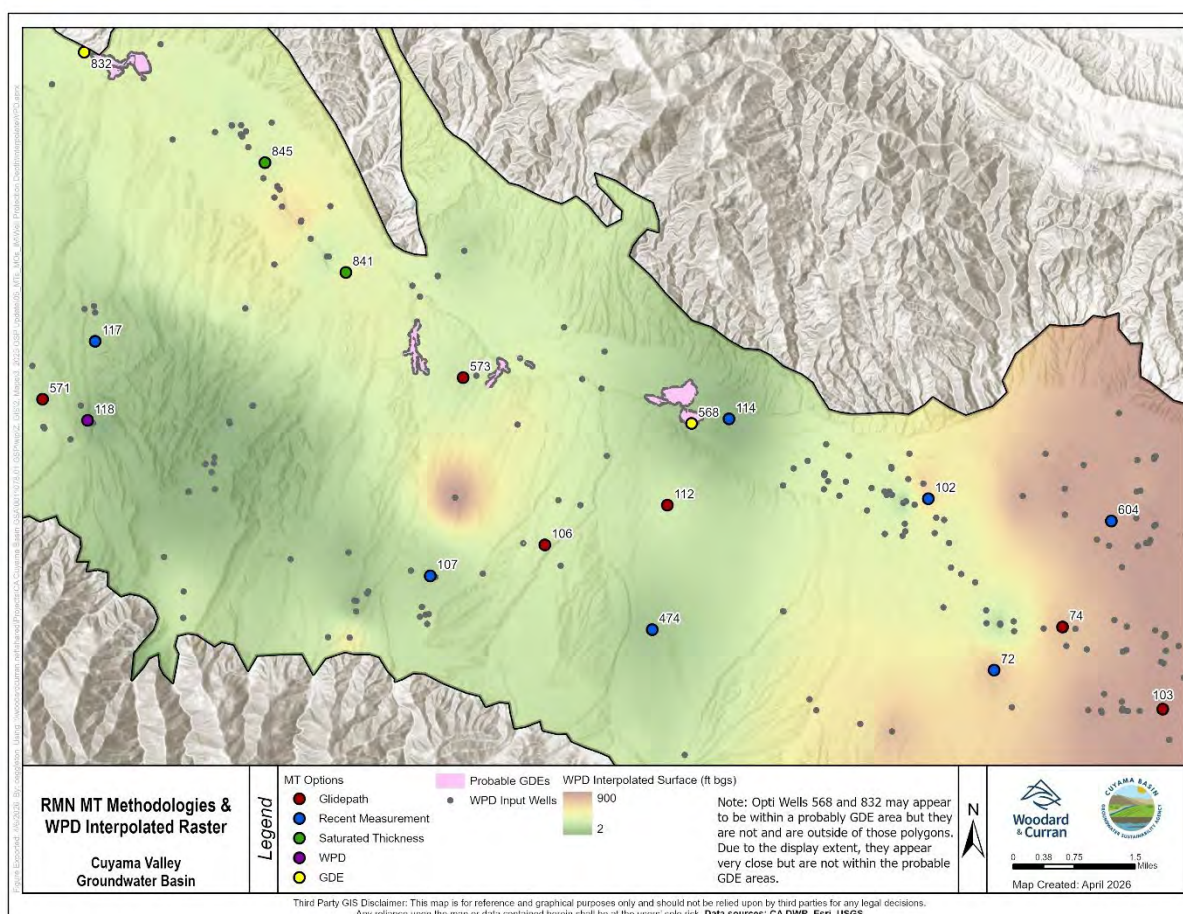


Figure 1-4: Example Area in the Cuyama Basin Showing MT Methodology and WPD Interpolated Surface

1.6 Explain How Changes to GWL SMCs will Not Have an Impact on Other SMCs (Request H)

The previous GWL SMC methodology was based on the best available data that was accessible at the time of the development of the original 2020 GSP. However, as discussed above, through the implementation of the GSP, much more data has been collected and processed which has allowed the CBGSA to improve its understanding of the Basin and its localized conditions. This was the driving factor to the development of

improved SMCs for the adopted 2025 GSP for groundwater levels based on this improved understanding of Basin conditions and their potential impact on beneficial uses and users.

Because the changes in groundwater level SMCs are reflective of better data and an improved understanding of the Basin, they are more appropriate for use in managing the Basin than the previous SMCs, which were developed using a simplified approach based on limited data. The plan for implementation of pumping allocations did not change between the 2020 GSP and 2025 GSP and is currently on schedule, as discussed below. In addition, the monitoring programs and adaptive management approach included in the GSP for the other sustainability indicators remain in place and will continue to allow the CBGSA to detect and respond to any adverse changes. Therefore, because the update in groundwater level SMCs are not expected to result in a substantive change in how the Basin is managed, it is not expected that they will cause any adverse impacts to any of the other sustainability indicators.

1.7 Provide Metrics and Data for Interim Milestones and Measurable Objectives (Request I)

While a detailed description of the new MT methodology is provided in the 2025 GSP, descriptions of the MO and IM calculations were inadvertently left out of the updated document. The method used to calculate measurable objectives (MOs) did not change for the 2025 GSP but there was a slight modification to the development of interim milestones (IMs).

In the 2020 GSP, the MOs were calculated using a Margin of Operational Flexibility (MoOF) for most regions in the Basin, which was calculated using historical data with different methodologies applied for each region. The following describes how the MO or MoOF was calculated for each region:

Southeastern Threshold Region: The MO for the Southeastern Threshold Region's wells was calculated by finding the measurement taken closest to (but not before) January 1, 2015 and not after April 30, 2015. If no measurement was taken during this four-month period, then a linear trendline was applied to the data and the value for January 1, 2015 was extrapolated.

Eastern Threshold Region: MoOFs were calculated by subtracting five years of groundwater storage from the MT. Five years of storage was found by calculating the decline in groundwater levels from 2013 to 2018 (a drought period). If measurements were insufficient for this time period, a linear trendline was used to extrapolate the value.

Central Threshold Region: The MoOFs were calculated by subtracting five years of groundwater storage from the MT. Five years of storage was found by calculating the decline in groundwater levels from 2013 to 2018 (a drought period). If measurements were insufficient for this time period, a linear trendline was used to extrapolate the value.

Western Threshold Region: The MO was calculated by finding the measurement closest to mid-February, 2018, which monitoring indicates is likely a full condition.

Northwestern Threshold Region: The MoOF for this region was calculated using 5 years of storage. Because historical data reflecting new operations in this region are limited, 50 feet was used as 5 years of storage based on local landowner input.

Badlands Threshold Region: This threshold region has no groundwater use or active wells. As a result, no MO, MT, or IM was calculated.

For the 2025 GSP, the same approach was used but where the MoOF was used, it was applied to the updated MT for each well to calculate an updated MO for the well. The only exception was that if the MoOF was previously less than 10 feet, then it was set at 10 feet for the 2025 GSP. Therefore, the Measurable Objectives for each GWL RMWs utilize the same difference between the MT and MO at each well that was used in the original 2020 GSP, except that for those wells where the difference was previously less than 10 feet. There was a slight modification to how the IMs were calculated. Previously in the 2020 GSP the 2025 IM was set to the MT, with the 2030 and 2035 IMs being one-third milestones (i.e. 2030 being 33.3% of the way towards the MO, and 2035 being 66.6% of the way towards the MO). This has now been adjusted in the 2025 GSP so that each IM year (2025, 2030, 2035) is adjusted at 25% increments between the MT and MO.

To provide an example of how the MOs and IMs have changed relative to a changing MT at a well, a well with a hypothetical MT of 300 ft bgs and an MO of 200 ft bgs in 2020 and an updated MT of 320 ft bgs for the 2025 GSP would have a new MO of 220 ft bgs. For the IM the difference between the MT and MO of the hypothetical well is 100 ft. Therefore, the 2025 IM is 25% of 100 ft, or 25 ft, and therefore is 320 ft - 25 ft = 295 ft bgs for 2025. The resulting numbers for the 2020 and 2025 GSP are shown below in **Table 1-2**.

Table 1-2: Hypothetical Representative Well Change in Measurable Objective and Interim Milestone Thresholds

Threshold	2020 GSP	2025 GSP
MT	300	320
2025 IM	300	295
2030 IM	267	270
2035 IM	233	245
MO	200	220

2. GROUNDWATER QUALITY: TOTAL DISSOLVED SOLIDS

Request:

- A. Explain how undesirable result definition of two years will not cause significant and unreasonable impacts to beneficial uses and users.
- B. Provide a detailed explanation on how the new information warrants changes to the sustainable management criteria for TDS groundwater quality. Provide a discussion of how the updated minimum thresholds may impact beneficial uses and users.
- C. Provide the data and criteria relied upon to establish the updated minimum thresholds, interim milestone, and measurable objectives (ref: 2022 GSP Table 5-2).

2.1 Explain How the 2-Year UR Definition is Protective (Request A)

TDS is being monitored by the CBGSA for several reasons. Local stakeholders identified TDS as one of the constituents of concern in the GSP development process, and there have been multiple measurements of TDS with high concentrations near domestic and public supply wells. Although high TDS concentrations are naturally occurring within the Basin, it is believed that management of groundwater levels may help improve TDS concentration levels to align with naturally occurring concentrations.

The undesirable result definition for degraded water quality is intended to reflect Basin conditions stemming from a causal nexus between SGMA-related groundwater quantity management activities and groundwater quality that causes a significant and unreasonable reduction in the long-term viability of domestic, agricultural, municipal, or environmental uses over the planning and implementation horizon of the GSP. This result is considered to occur during GSP implementation when 30 percent of the representative monitoring points (i.e., 9 of 29 sites) exceed the minimum threshold for a constituent for 24 consecutive months.

The 30 percent of wells exceeding their MT for 24 consecutive months criteria included in the GSP allows the CBGSA the flexibility to identify the cause of MT exceedances and to develop a plan for response (per the Adaptive Management approach described in GSP Section 7.6). Potential causes of MT exceedances could include:

- Prolonged drought;
- Pumping nearby the representative well; and
- Unreliable and non-representative data used to calculate the MT.

Minimum threshold exceedances in multiple wells is considered more indicative of a basin-scale decline in groundwater quality and potential adverse impacts on beneficial uses and users of groundwater, as opposed to more localized groundwater quality declines. Setting the Identification of Undesirable Results criteria at 30 percent or more of wells exceeding their MT is intended to reflect undesirable results at the basin-scale and using 24 consecutive months allows the CBGSA time to address issues, perform investigations, and implement projects and management actions as needed.

2.2 Explain How New Information Warranted Changes to SMC for TDS and Explain How Data Drove the TDS Thresholds (Requests B and C)

The sustainable management criteria for TDS were updated as part of the 2025 GSP to incorporate additional monitoring data collected since adoption of the 2020 GSP. At the time the original TDS thresholds were established, the available dataset was limited for several representative monitoring wells. **Figure 2-1** shows the available TDS data at several example wells. As shown in the figure, available data prior to development of the 2020 GSP was scarce for many wells and in some cases was several years out of date. However, the CBGSA has conducted consistent sampling since GSP implementation began in 2020, greatly improving the availability of data. The 2020 GSP acknowledged this data limitation and stated that additional information collected during GSP implementation would be used to improve the understanding of TDS conditions within the Basin and, if appropriate, the groundwater quality thresholds would be updated. The revisions presented in the 2025 GSP are consistent with that stated intent and are based on the best available information currently available.

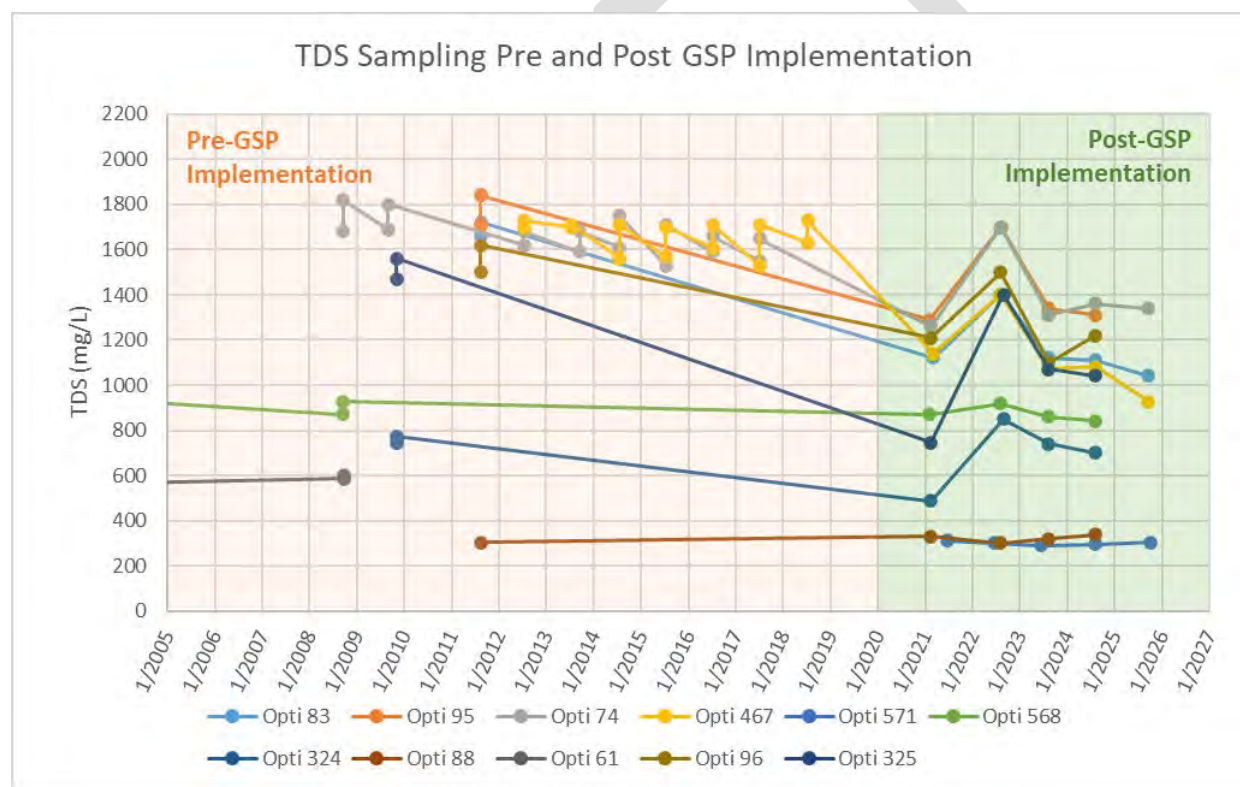


Figure 2-1: Example TDS Monitoring Wells Showing Sampling Data Pre- and Post-GSP Implementation

Following this approach, the minimum thresholds for TDS were recalculated for the 2025 GSP Update using the same methodology applied in the 2020 GSP, but with a larger and more representative dataset. MTs are calculated as 20 percent of the total observed range at each representative monitoring site above the 90th percentile of measurements for that site. For example, Opti Well 72 has a minimum recorded TDS

concentration of 955 mg/L and a maximum of 1,020 mg/L, resulting in a total range of 65 mg/L. Twenty percent of this range is 13 mg/L. The 90th percentile concentration for Opti Well 72 is 1,010 mg/L; therefore, the MT is calculated by adding 13 mg/L to the 90th percentile value, resulting in an MT of 1,023 mg/L. This methodology establishes site-specific thresholds based on observed historical conditions at each representative well.

Measurable Objectives (MOs) were established to provide an appropriate margin of operational flexibility while remaining aligned with applicable water quality benchmarks. For representative wells with the most recent TDS measurements exceeding the short-term secondary maximum contaminant level (SMCL) of 1,500 mg/L, the MO was set equal to the short-term SMCL. For representative wells where the most recent measurement was below 1,500 mg/L, the MO was set equal to the most recent measured concentration. This approach reflects existing Basin conditions and provides a realistic management target while maintaining consistency across the representative monitoring network.

Consistent with SGMA regulations, the Basin must avoid undesirable results by avoiding MT exceedances. Accordingly, Interim Milestones were set equal to the MTs for the 2025 planning horizon, with projected improvements to one-third of the distance between the MT and MO by 2030 and one-half of the distance between the MT and MO by 2035. This stepped approach is intended to track progress toward long-term groundwater quality objectives while maintaining a clear compliance path with SGMA requirements.

The revised TDS minimum thresholds are directly informed by historical, site-specific groundwater quality data collected within the Basin. This data-driven approach reflects TDS concentrations that have historically supported beneficial uses, including agricultural uses, within the Basin. As documented in the GSP, the types and concentrations of salts present in the Basin are similar to historical levels seen in 2015 and observed TDS concentrations have not historically resulted in widespread impairment of domestic wells or of agricultural productivity. As a result, thresholds derived from observed Basin conditions are considered more representative of locally appropriate groundwater quality conditions than reliance on secondary MCLs alone.

Since the 2025 MTs for TDS are based on an already expanded dataset now available, the CBGSA does not currently anticipate further revisions to TDS thresholds for the existing representative monitoring wells during the next Periodic Evaluation. However, additional wells have been added to the non-representative monitoring network to address data gaps. Once sufficient historical data are available, some of these wells may be considered for inclusion in the representative monitoring network. The methodology for establishing thresholds for any newly designated representative wells has not yet been finalized but is expected to be consistent with the approach used for the current representative network and would be evaluated during a future Periodic Evaluation.

3. GROUNDWATER QUALITY: NITRATE AND ARSENIC

Request:

- A. Provide an explanation for the lack of advancement on the development of sustainable management criteria for nitrate and arsenic.
- B. What is the status of the Improvement Water Supply Reliability for Local Communities project, the baselines establishment for arsenic and nitrates, and the establishment of a monitoring network as mentioned in the 2022 GSP which the Department highlighted in the 2023 Staff Report?
- C. Establish sustainable management criteria and a monitoring network for Nitrates and Arsenic.²³
CCR § 354.26(d)

The CBGSA takes seriously its obligation to effectively monitor for and manage arsenic and nitrates in the Cuyama Basin. The following activities are currently being undertaken to manage these constituents during GSP implementation.

Coordination with Other Regulatory Programs:

The CBGSA coordinates and works with the Regional Water Quality Control Board and other responsible regulatory programs on a regular basis for the successful and sustainable management of water resources that protect against undesirable conditions related to nitrates and arsenic. In the event groundwater conditions related to nitrate and arsenic begin to impact the beneficial uses and users of groundwater in the Basin, the CBGSA will notify the appropriate regulatory program and/or agency and initiate more frequent coordination to address those conditions and support their regulatory actions to address those conditions.

Measurement of Nitrate and Arsenic at CBGSA Wells:

As discussed in Chapter 4 of the 2025 GSP, the CBGSA will take nitrate and arsenic measurements once every five years as part of its monitoring program to establish a baseline understanding of nitrate and arsenic concentrations in the Basin. Nitrate and arsenic measurements were collected by the CBGSA in 2022 and reported in the Annual Report for that year. The CBGSA intends to collect additional measurements in 2027 to provide an updated baseline in advance of the 2030 Periodic Evaluation.

Annual Collection and Evaluation of Available Arsenic and Nitrate Data:

Each year the CBGSA leverages existing monitoring programs for nitrate and arsenic through the USGS for the collection of arsenic data and through the California State Water Resource Control Board Groundwater Ambient Monitoring and Assessment (GAMA) and Geotracker Databases, which include data from the Central Coast Regional Water Board's Irrigated Lands Program, for nitrates. Recently collected nitrate and arsenic data were reported in the WY 2024-2025 Annual Report and are shown below in **Figure 3-1** for nitrate and in **Figure 3-2** for arsenic. These recent measurements for nitrate and arsenic were compared to those that were reported in the 2025 GSP for the 2010-2020 period for nitrate (GSP Figure 2-80) and for arsenic (GSP Figure 2-81) to assess what changes may have occurred. The available data indicates that the wells with recent high concentrations of nitrate and arsenic are at

similar locations to the locations of historical measurements of high concentrations of each constituent, which indicates that no migration has occurred.

Mitigate Arsenic Impacts Through Implementation of a Replacement Well for the CCSD (part of the GSP's Improve Water Supply Reliability for Local Communities project):

The 2020 GSP and 2025 GSP Update included as a project the construction of a new replacement well in the CCSD's service area to replace Well 2, which had previously been abandoned. Since the abandonment of Well 2, the CCSD has used a single well for water supply, with treatment applied to reduce arsenic levels down to below the state MCL for arsenic. The CCSD received a grant from DWR's IRWM program in 2020 to develop a second well for its system, and the CCSD has been pursuing completion of the new well since receipt of the grant. Unfortunately, the project has been delayed due to issues with securing a well contractor and with finding an appropriate site for the new well. However, implementation is currently ongoing, with drilling of a test well, water quality sampling, and a preliminary well design completed as of early 2026. Once water quality sampling has been confirmed, the well design will be finalized and the new well will be installed. The CCSD currently anticipates that the new well will be installed by Spring 2027.

Reduce the Application of Nitrates with Pumping Allocations:

GSP implementation of pumping allocations in the Central Management Area will likely have an indirect effect on nitrates in the central portion of the Basin due to the reduction in pumping allocations that were included in the GSP. This should reduce the application of fertilizers in the central part of the Basin as agricultural production in the Basin is reduced over time.

Undertake Additional Actions as Needed to Address Arsenic and Nitrate:

If undesirable groundwater conditions for nitrate and arsenic are found to be the result of Basin management by the CBGSA, the CBGSA will consider developing a process to help mitigate or assist those uses and users by utilizing adaptive management strategies, including pumping management or well rehabilitation or replacement. The CBGSA will rely on and coordinate with the current processes and programs as managed by other responsible agencies to manage nitrate and arsenic in a sustainable manner.

While the CBGSA is actively managing arsenic and nitrates with the above activities, as discussed in the 2025 GSP, the CBGSA Board does not believe that it is appropriate to set sustainable management criteria for these constituents. However, if the CBGSA observes a significant change in levels or locations of high concentrations of nitrates or arsenic, it will evaluate potential mitigation measures including establishing sustainable management criteria, more frequent monitoring, and other potential actions.

In the case of nitrates, the CBGSA does not have the regulatory authority granted through SGMA to regulate the application of fertilizer. The CBGSA can encourage agricultural users in the Basin to use best management practices when using fertilizers but does not have a mechanism to directly control nitrate concentrations.

In the case of arsenic, arsenic is naturally occurring and located in a relatively small area of the Basin south of New Cuyama. There are no active private domestic wells located in this part of the Basin. The only

operational public well that is located in this part of the Basin serves the CCSD. As noted above, the CCSD is currently pursuing the drilling of a new production well, which is expected to be completed in 2027. Once this well is completed, it is not believed that any domestic water users will be using a well that accesses groundwater with known high arsenic concentrations.

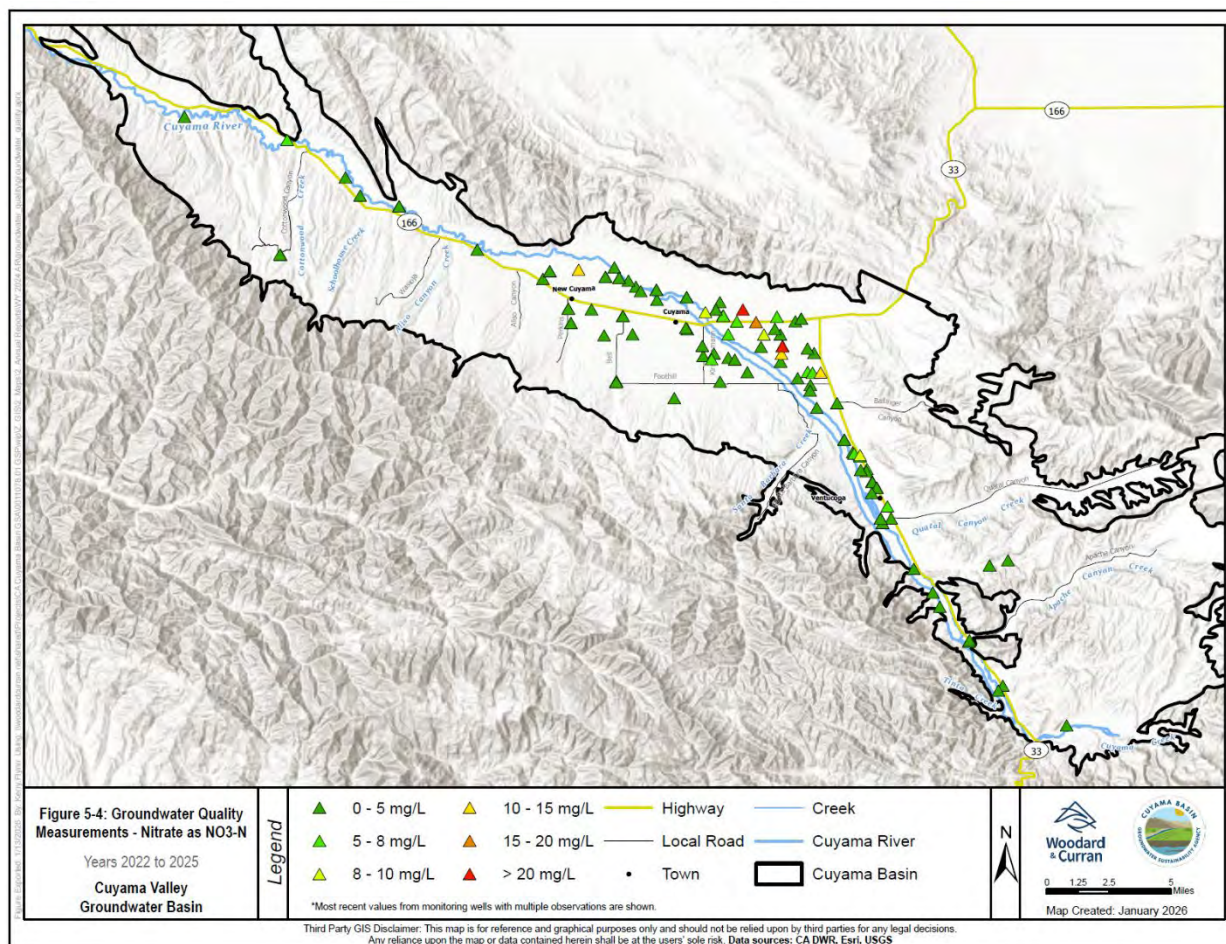


Figure 3-1: Cuyama Basin 2022-2025 Groundwater Quality Measurements – Nitrate

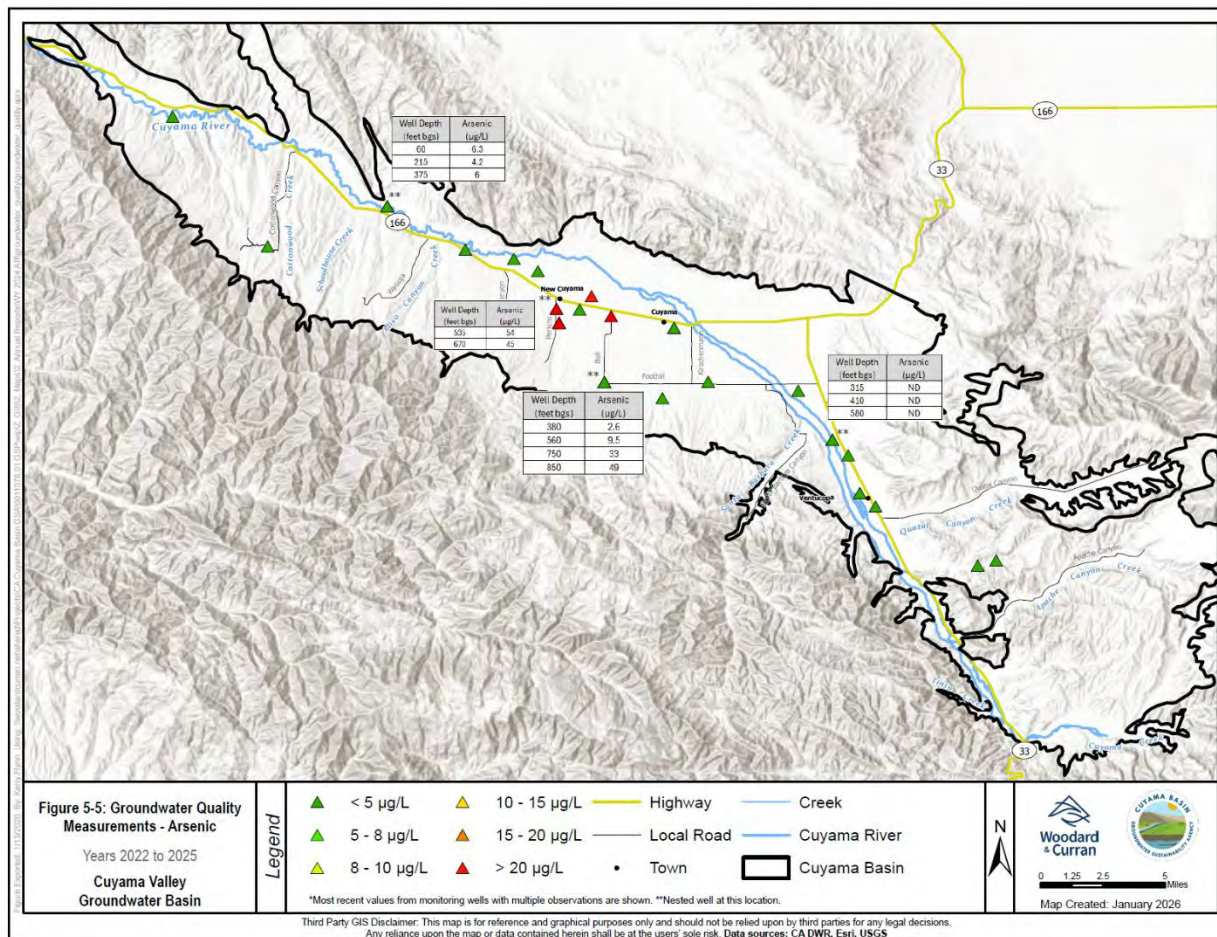


Figure 3-2: Cuyama Basin 2022-2025 Groundwater Quality Measurements – Arsenic

4. LAND SUBSIDENCE

Request: In light of changes to groundwater levels sustainable management criteria, explain impacts to subsidence, including:

- A. How the basin will be able to achieve the measurable objective of zero subsidence,
- B. How the amount total cumulative subsidence which will avoid significant and unreasonable impacts,
- C. How a minimum threshold of 2 inches per year continues to be reasonable.

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

The undesirable result for subsidence, as described in Section 3.2.5 of the GSP, is detected when 30 percent of representative subsidence monitoring sites (i.e., 1 of 2 sites) exceed the minimum threshold for subsidence over two years. The minimum threshold for subsidence, as defined in GSP Section 5.6.3, is 2 inches per year. The UR criteria of 2 inches per year was established in the GSP through historical analysis of data, stakeholder input, professional judgement, and an evaluation of potential critical infrastructure. The CBGSA believes that using a rate of 2 inches per year will provide an adequate indicator of potential subsidence issues while allowing the Basin operational flexibility as it protects beneficial uses and users within the Basin. Furthermore, subsidence is not believed to present a great risk to the Basin because there is a lack of vulnerable infrastructure in the Basin that may be affected by subsidence and because there has been little actual measured subsidence in the Basin in recent years.

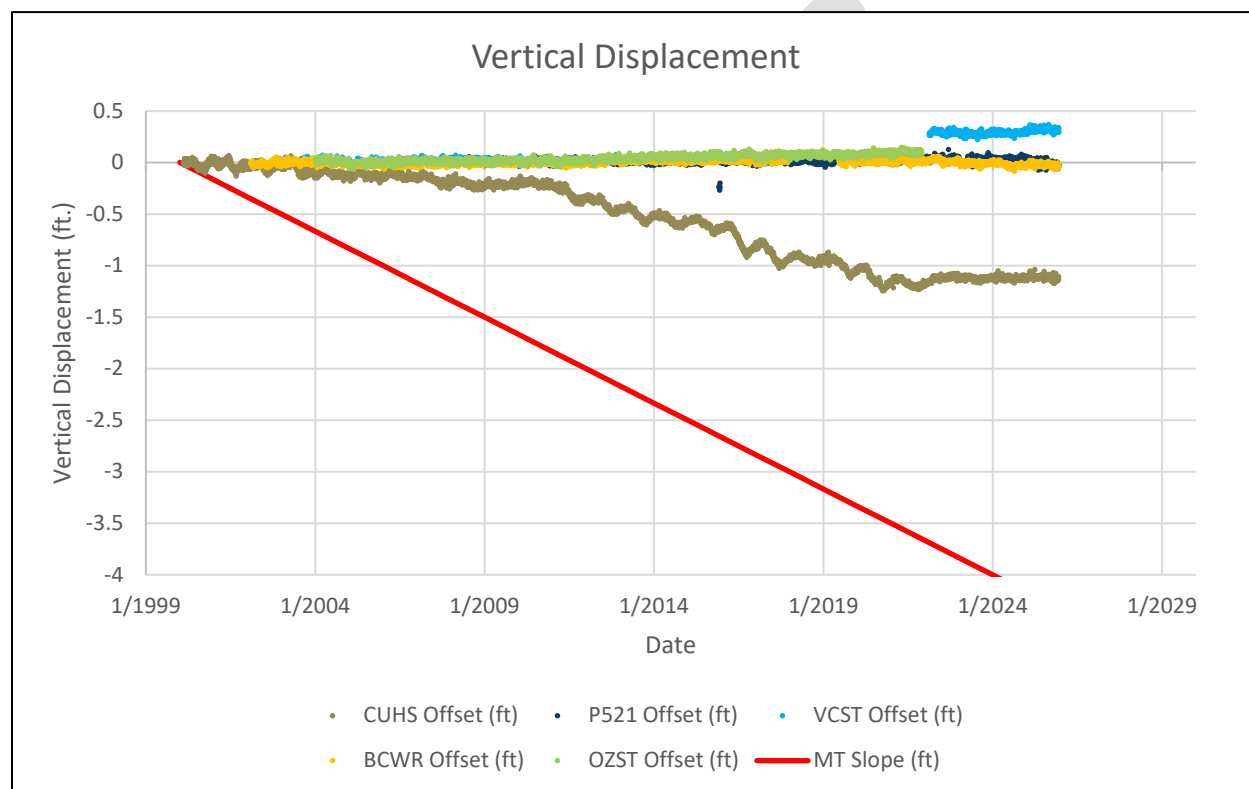
Table 4-1 provides a summary of the infrastructure present in the Cuyama Basin and the potential impacts of subsidence to that infrastructure for each of the categories included in Table 5-1 of DWR's *Draft Best Management Practices of the Sustainable Management of Groundwater* (January 2026). As shown in the table, the communities present in the Cuyama Basin are small, and while there are two major highways in the Basin, there are no significant railroads, canals, or flood control facilities. The primary infrastructure risks that may be caused by subsidence are potential damage to groundwater wells and to the local highways or bridges. However, given the low levels of recently measured subsidence in the Basin, these effects appear unlikely to occur.

Table 4-1: Summary of Infrastructure in the Cuyama Basin

Infrastructure of Land User Type	Infrastructure	Assessment Potential Subsidence Impact
Cities and Communities	Property drainage	Not anticipated to be impacted
	Power Systems	Not anticipated to be impacted
	Municipal water systems	Three small water systems are in the Basin: -CCSD - largest and serves about 1,000 people -Cuyama - smaller system -Ventucopa - smaller system All Municipal water systems were considered during SMC development and not anticipated to be impacted.
	Sewer systems	CCSD - small water and sewer system and serves about 1,000. All Municipal water systems were considered during SMC development and not anticipated to be impacted.
Pipelines and Other Utilities	Natural gas	No known facilities that are anticipated to be impacted
	Water	No large pipelines other than those for the three water system and privately owned irrigation lines
	Underground Cables and overhead powerline utilities	No known facilities that are anticipated to be impacted
Railroads	Private rail	Not applicable
	High-speed rail	Not applicable
Roads	Drainage systems	Not applicable
	Highways	Two Highways (166 & 33)
	Bridges	Two small bridges over Cuyama River on HW 166, one near Cuyama and one at the western edge of the Basin.
Canals	State canals	Not applicable
	Federal canals	Not applicable
	Local canals	Not applicable
Flood Control & Drainage	Federal, State, and Local flood facilities	Not applicable
Groundwater Pumping Facilities	Domestic, agricultural, and public supply wells	There are many wells across the Basin, but all were considered in SMC development. Wells have also been categorized by active or inactive status and categorized by type. Well reporting programs have been implemented to report on impacts to wells.

Based on recent data, GSP implementation and recent reductions in groundwater extractions appear to be stabilizing subsidence and therefore cumulative subsidence is not anticipated to detrimentally impact beneficial uses and users in the Basin over the implementation period. In the years prior to submittal of the

GSP in 2020, subsidence rates for the CUHS station were measured at -0.56 inches per year. However, as shown in **Figure 4-1**, there has been very little subsidence measured at this station (or at any other stations in or near the Basin) since 2020. Recent data indicates that the rate of subsidence over the last two years is actually negative (i.e. the ground surface elevation is increasing) by 0.07 inches in the central portion of the Basin and by 0.31 inches near Ventucopa. This conclusion is supported by subsidence data that is available through TRE Altamira InSAR Dataset from DWR. Raster results for the change over each of the last five water years show no discernable change (between -0.1 and +0.1 feet) in any part of the Basin over that period. As an example, **Figure 4-2** shows the TRE Altamira results for WY 2024-2025.



Note: This figure shows the CUHS data line with the USGS correction in 2024 removed to better see the overall trend of vertical displacement in recent years.

Figure 4-1: Subsidence Monitoring Data WY 2024-2025

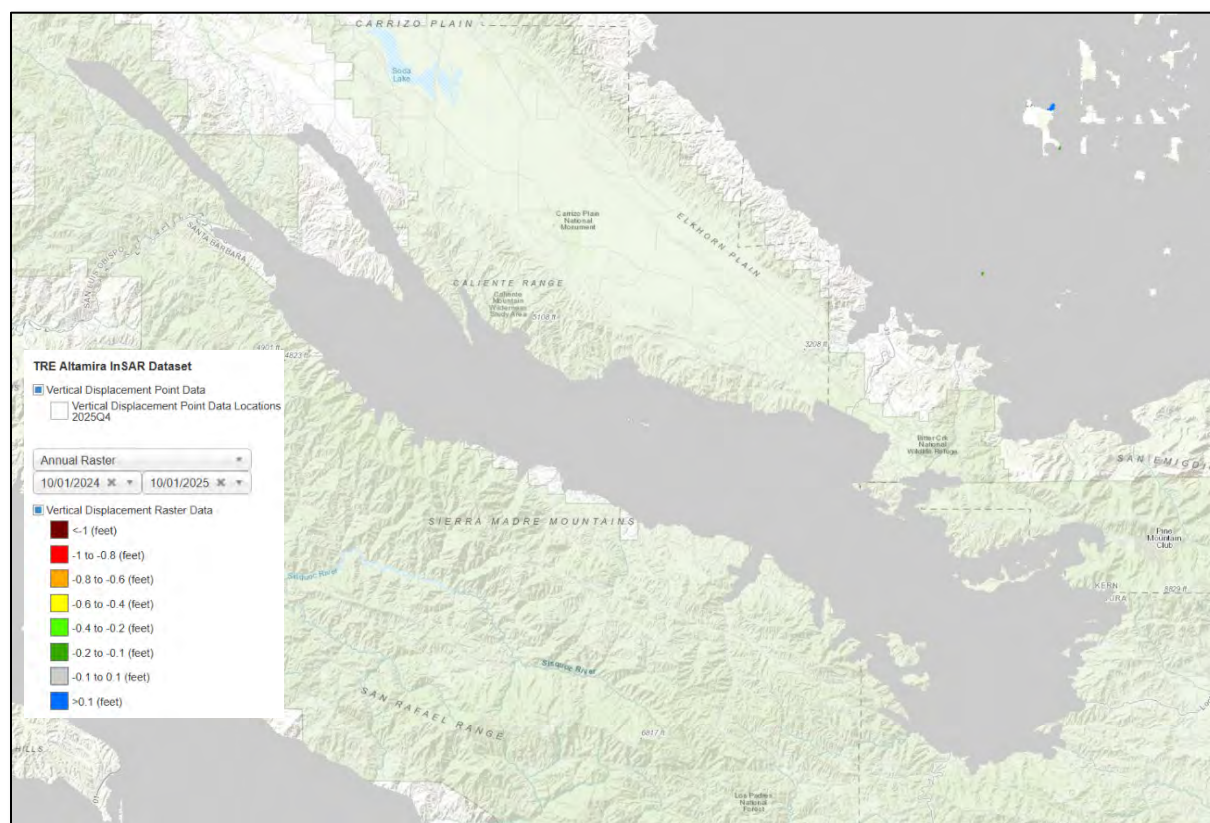


Figure 4-2: Cuyama Subsidence Raster from SGMA Data Viewer – TRE Altamira InSAR Data – WY 2024-2025

Given the lack of critical infrastructure and the lack of significant subsidence in recent years, the CBGSA believes that subsidence is not currently causing significant and unreasonable impacts in the Basin and that the UR definition and SMCs that have been established for subsidence provide the flexibility to respond to any future subsidence that may occur. In addition, with the pumping allocations management action included in the GSP, it is expected that groundwater pumping levels in the Basin will be approximately equal to the Basin’s sustainable yield by 2038, which should result in subsidence levels that are maintained at or very close to the measurable objective of zero subsidence in the Basin. If the measured rate of subsidence increases in future years, the CBGSA will consider performing additional technical analyses to diagnose and address the issue, including those recommended in the DWR Subsidence BMP.

5. MONITORING

Request:

- A. Clarify how missed measurements are factored when determining an undesirable result.
- B. Reconcile the list of wells and provide the list of TDS water quality RMS wells; and consistently report on these wells in future periodic evaluations and annual reports.
- C. Provide a schedule for migrating new wells, installed as part of the GSP implementation, to become representative monitoring sites with sustainable management criteria.

5.1 Clarify how Missed Measurements are Factored (Request A)

The CBGSA utilizes regularly groundwater level and groundwater quality monitoring reports to monitor the status of those SMCs (and those that use GWL as a proxy). GWL Conditions Reports are published quarterly while groundwater quality reports are published annually. These reports, which are available to the public via the Basin's website, provide the most recent measurements for each representative site, the status of that site related to its thresholds, and how many months, if applicable, that well has exceeded its minimum threshold. If a site is unable to be monitored, is missing data, or has an issue, that information is also provided.

In the event that a site is missing a measurement or multiple measurements and is trending towards an exceedance of its minimum threshold, that is also noted in the conditions report. Trend analysis and professional judgement is used and if a site is already in exceedance or is expected to exceed its minimum threshold during a reporting period but that data is missing, it is assumed that the site has exceeded the MT. This also applies to assessing undesirable results criteria for each SMC.

Groundwater Level and Groundwater Quality Conditions Reports can be accessed at <https://cuyamabasin.org/resources#basin-reports>.

5.2 Reconcile List of GWQ RMN Wells (Request B)

There was an error in a table in the 2025 Adopted GSP. The corrected GWQ RMW table is included in the WY 2024-2025 Annual Report. **Table 5-1** below includes the GWQ RMWs with the water quality sustainable management criteria for each well.

Table 5-1: Groundwater Quality Wells

Opti ID	TDS		
	MO (mg/L)	MT (mg/L)	2025 Interim Milestone (mg/L)
61	585	1000	896
72	900	1106	1055
74	1310	1872	1732
77	1120	1682	1542
79	1500	2318	2114
83	1120	1816	1642
88	320	1000	830
90	1400	1596	1547
91	1020	1558	1424
95	1340	1950	1798
96	1100	1676	1532
99	1140	1658	1529
101	1210	1735	1604
102	1500	2551	2288
157	1360	2468	2191
204	380	1000	845
242	780	1656	1437
316	1060	1524	1408
317	692	1444	1256
322	1140	1504	1413
324	740	1000	935
325	1070	1687	1533
420	1080	1560	1440
421	1280	1761	1640
424	1260	1658	1559
467	1070	1846	1652
568	860	1118	1054
841	561	1000	890
845	1250	1250	1250

5.3 Provide a Schedule for Migrating New Wells into RMN (Request C)

Since submittal of the 2020 GSP, there have been 22 new monitoring wells installed in the Cuyama Basin, including three multi-completion well locations (Well ID 900-908) installed by DWR's Technical Support Services (TSS), and four additional multi-completion well locations and five single-completion wells installed by the CBGSA. The CBGSA intends to integrate these new wells into the RMN, targeting five years of data collection to provide enough historical context for full integration into the RMN and future analysis. **Table 5-2** shows the month and year where a GWL measurement was first taken at each well and the anticipated year when each well will be analyzed and potential incorporation into the RMN will be considered. Since the TSS wells were first measured during July 2022, the CBGSA will perform an analysis of these wells in 2027. The analysis will assess whether the data collected from these wells show consistent, non-erratic results that provide a suitable basis for developing SMCs. The remaining wells were first measured during August 2023 or later; therefore, these wells will be evaluated during the 2028-2030 period.

Table 5-2: Timing of Initial Measurements and SMC Consideration for Newly Installed Wells

Wells	First Measurement Date	Year of SMC Consideration
900, 901, 902	July 2022	2027
903, 904, 905	July 2022	2027
906, 907, 908	July 2022	2027
909	January 2024	2029
910	January 2024	2029
911	January 2024	2029
912, 913	January 2024	2029
914	August 2023	2028
915, 916	October 2024	2029
917, 918	October 2024	2029
919, 920	August 2024	2029
921	April 2025	2030

DRAFT

6. PLAN IMPLEMENTATION

Request:

- A. Provide what the target and actual allocations through WY 2024 were for Management Action 2: Pumping Allocations and confirm the single baseline for the allocations. In addition, provide details on what the annual targets for reduced pumping will be through 2040. Also, ensure that future annual reports included target and actual allocation reduction results and an explanation for any future adjustments to the baseline.

Implementation of Management Action 2 has proceeded along the same timeline that was introduced in the original 2020 GSP and used in the 2025 GSP. **Figure 6-1** shows the planned pumping reduction schedule that was included in the GSP. The allocation schedule called for reductions in Central Management Area (CMA) pumping of 5 percent in each year in 2023 and 2024 and additional reductions of 6.5 percent annually from 2025 through 2038, so as to achieve sustainability in the CMA in 2038. The CBGSA completed the initial pumping allocation plan in 2022, with pumping reductions beginning in 2023 at 5 percent of the total required reduction to achieve sustainability, and an additional 5 percent reduction in 2024.

In 2024, the CBGSA Board approved additional pumping allocations for 2025 through 2029, which applied reductions of 6.5 percent per year. It should be noted, however, that the CBWRM that is used to estimate pumping within the CMA was re-calibrated in 2024, resulting in a significant reduction in the estimated pumping during the historical period with only small changes in the estimated sustainable yield (i.e. about 11,000 AF). To account for this change while also allowing for a transition period for landowners to adjust, the CBGSA Board voted to continue to use the previous Baseline (i.e. year 2022 starting value; about 50,600 acre-feet per year (AFY)) to develop allocation amounts for 2025 but to develop the allocation amounts for 2026 through 2029 using a revised Baseline based on the updated model (i.e. 39,500 AFY). In each year, the allocation amount is calculated as the relevant Baseline amount for that year reduced by the cumulative percent reduction based on the Glide Path curve shown in **Figure 6-1**. The resulting pumping allocation amounts for the CMA are shown in **Figure 6-2**.

The CBGSA intends to develop additional allocations for the period beyond 2029 that would achieve the overall target reduction volume specified in the GSP to reach sustainable conditions. The specific approaches for determining the allocation amounts for landowners in the CMA will be developed and implemented during 2029 to take advantage of future data improvements and an anticipated update and re-calibration of the CBWRM. **Figure 6-2** shows the projected CMA allocations for the 2030-2040 period based on the current CBWRM, which would bring the CMA pumping in line with the estimated sustainable yield by 2038.

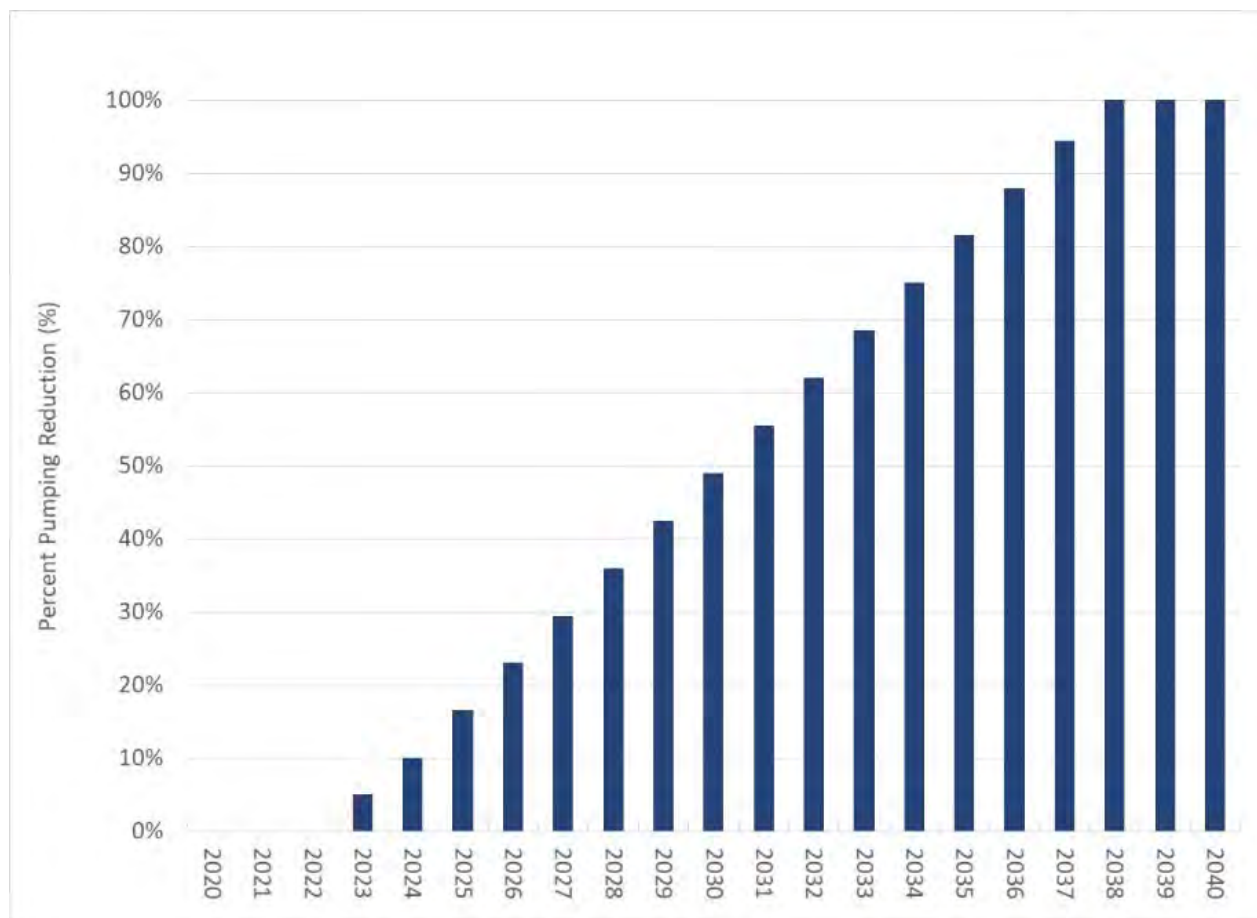


Figure 6-1: Glide Path for CMA Groundwater Pumping Reductions



Figure 6-2: CBGSA Board-Approved and Projected CMA Allocations

Table 6-1 compares the total CMA allocation quantities in 2023 through 2025 with actual pumping, which was recorded with pumping meters by water users in the CMA in each calendar year. Total CMA pumping was at or below the total CMA pumping allocation amount in all three years. It was significantly lower than the total allocations because 1) as discussed above, the allocations for these years were based on the previous version of the model which over-estimated historical pumping in the CMA; and 2) landowners have already been reducing their pumping levels in recent years compared to historical levels. As the allocation implementation continues into the future, the annual reductions in allowable allocation amounts will cause overall extractions in the CMA to reduce over time.

Table 6-1: Total CMA Allocations and Extractions

Calendar Year	Allocations (Acre-feet)	Extractions (Acre-feet)
2023	47,246	23,454
2024	45,350	25,940
2025	44,295	25,747

7. DATA REPORTING

Request:

- A. Provide the measured extraction data for water years 2020 through 2024. If modeled data is the best available for the basin, please provide an explanation of how the modeled data is more accurate than measured extraction data).

In the future, the GSA should be providing the consistent accurate data with the best available science via annual reports, periodic evaluations, and any future GSP updates in a manner consistent with GSP Regulations.

For basin management, the CBGSA utilizes both landowner reported and model estimated groundwater extractions. These were both provided in the WY 2024-2025 Annual Report. Landowner reported groundwater extraction volumes (reported on a calendar year basis) are used to set extraction fees, verify landowners are pumping less than or equal to their allocations, and to validate the groundwater model. Modeled extraction estimates (estimated on a water year basis) are used to develop the basin water budgets for the historical period (1998-2025) and for the current and projected condition water budgets included in the GSP (which utilizes the 1968-2017 hydrologic years).

7.1 Landowner Reported Groundwater Extractions

All landowners within the Cuyama Basin with a total water use of 25 AFY or more have been required to install flow meters and report groundwater pumping on a calendar year basis since 2022. The total groundwater extraction volumes reported for each calendar year are shown in **Table 7-1** below. Note that while these quantities are used to calibrate the model, they won't match exactly with the model reported values below because of the differences between calendar and water year reporting and because the model estimation of pumping is based on land use and evapotranspiration assumptions and may not exactly match real-world results in any given year.

Table 7-1: Basin-Wide Extractions Reported by Landowners

Calendar Year	Landowner Reported Extractions (Acre-feet)
2022	44,425
2023	34,391
2024	37,338
2025	34,219

7.2 Model Estimated Groundwater Extractions

Water budgets in the Cuyama Basin GSP are developed using the CBWRM, which is a fully integrated surface and groundwater flow model covering the Basin. The CBWRM was used to develop a historical water budget that evaluated the availability and reliability of past surface water supply deliveries, aquifer response to water supply, and demand trends relative to water year type. For the 2020 GSP, the CBWRM was used to develop water budget estimates for the hydrologic period of 1998 through 2017. An update and recalibration of the model was completed in 2024 for the 2025 GSP Update and was based on the best available data and information as of September 2023. As part of the model update, the pumping estimates

for historical years were re-assessed using the reported pumping estimates for each landowner in 2022 and 2023. This analysis revealed that the previous version of the model had over-estimated pumping during these years and therefore the model re-calibration significantly reduced the quantity of groundwater pumping in the model; for example, for water year 2023 the model estimated pumping was reduced from about 50,000 AFY to about 34,000 AFY. Since the pumping estimates from the updated model are much closer to the reported pumping amounts, the updated model is being used by the CBGSA for basin management.

Table 7-2 shows the total groundwater extraction volumes estimated by the model for each water year from 2020 through 2025. **Figure 7-1** shows the annual time series of groundwater pumping for the water years 1998 through 2025.

Table 7-2: Model Estimated Basin-Wide Extractions

Water Year	Groundwater Extractions (Acre-feet)
2020	42,700
2021	43,200
2022	41,900
2023	34,100
2024	33,700
2025	38,200

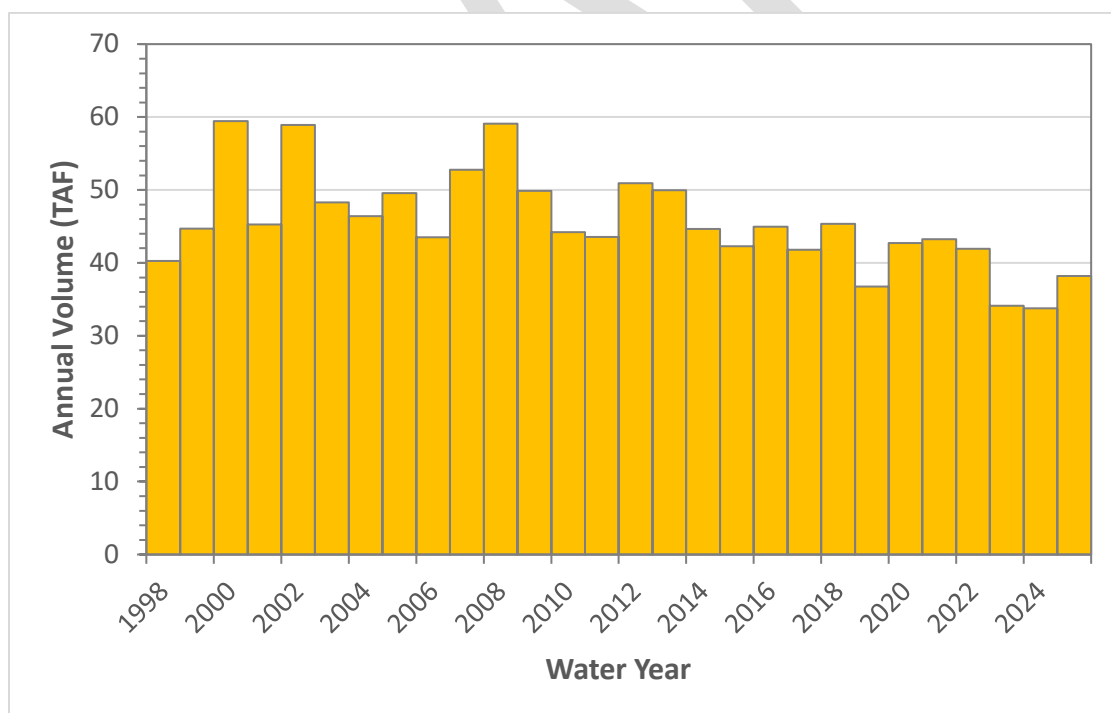


Figure 7-1: Annual Groundwater Extraction in the Cuyama Basin in Water Years 1998-2025



TO: Board of Directors
Agenda Item No. 8c

FROM: Taylor Blakslee

DATE: April 30, 2026

SUBJECT: Discuss and Take Appropriate Action on the Fiscal Year 2026-2027 Budget and Cash Flow

Recommended Motion

SAC feedback on the draft Fiscal Year 2026-2027 Budget.

Discussion

On March 4, 2026, staff presented a draft list of Fiscal Year 2026-2027 budget components and received feedback on which items to develop costs estimates for inclusion in the draft Fiscal Year 2026-2027 budget.

Staff developed those budget estimates and reviewed them with the FY 2026-2027 Budget Ad hoc (Directors Ellsworth, Grant and Young) which are provided as **Attachment 1**.

Three notables items are:

1. Staff was requested to look at ways to reduce overall costs in the budget including the costs associated with the Standing Advisory Committee meetings. Staff developed several options, provided as **Attachment 2**, and the Budget Ad hoc recommended option 1e where legal does not attend the meeting, and technical support staff is only available for 3 hours.
2. Adjudication costs for the Executive Director and support staff, and technical staff has not been fully defined and will require further direction from the Board.
3. The draft model improvements are a significant cost in the draft Budget totaling ~\$440,000 and if implemented only represent approximately 50% of the total costs which would be recognized in the following fiscal year.

Staff is seeking any feedback from the Standing Advisory Committee on the draft Fiscal Year 2026-2027 budget.

DRAFT

CBGSA FISCAL YEAR 2026-2027 BUDGET

CATEGORY	New / Removed	2025-26 Budget	2026-27 Budget	% Change	Ad hoc recommendation
A HALLMARK GROUP					
1 CBGSA Board and SAC Meetings		\$ 136,700	\$ 111,700	-18%	No legal and limited technical support
2 GSP Implementation		\$ 50,000	\$ 55,000	10%	
3 Response to DWR on Amended GSP		\$ 14,100	\$ 6,875	-51%	
4 Groundwater Extraction Fee and Allocation Management					
Annual Groundwater Extraction Reporting & Fee		\$ 14,000	\$ 14,100	1%	
CMA Groundwater Allocation Implementation & Management		\$ 13,300	\$ 9,400	-29%	
5 Financial Information Coordination		\$ 46,800	\$ 40,000	-15%	
6 Outreach		\$ 20,500	\$ 16,500	-20%	
7 Adjudication Coordination/Support		\$ 24,100	\$ 15,100	-37%	Adjudication costs to be updated following Board direction.
Expand Allocations Outside Management Area (Consider During Annual AR)	Removed	\$ 5,600			
Expand Allocations in Ventucopa	Removed	\$ 5,600			
Subtotal		\$ 330,700	\$ 268,675	-19%	
B LEGAL					
1 General Legal Counsel		\$ 150,000	\$ 145,310	-3%	
2 Adjudication Legal Counsel		\$ 100,000	\$ 184,140	84%	
Subtotal		\$ 250,000	\$ 329,450	32%	
C ADMIN					
1 Audit (FY 26-27)		\$ 10,000	\$ 12,000	20%	
2 Insurance (D&O, General Liability)		\$ 21,400	\$ 23,600	10%	
3 California Association of Mutual Water Co. Membership		\$ 200	\$ 200	0%	
4 2026 Updated Parcel Data		\$ 4,000	\$ 4,000	0%	
CIMIS Station (Initial Setup)	Removed	\$ 60,000			
5 CIMIS Station (Annual O&M)		\$ 14,000	\$ 14,000	0%	
6 Mail house (Noticing)		\$ 5,000	\$ 6,000	20%	
7 Contingency		\$ 20,000	\$ 20,000	0%	Keep as is
Subtotal		\$ 134,600	\$ 79,800	-41%	
D WOODARD & CURRAN & TECHNICAL					
1 Stakeholder/Board and Outreach Engagement Support					
1.1 SAC meetings		\$ 24,600	\$ 25,965	6%	Limited technical support
1.2 Board meetings		\$ 44,300	\$ 47,205	7%	
1.3 Tech Forum calls		\$ 10,000	\$ 10,515	5%	
1.4 Public Workshops		\$ 18,300	\$ 19,550	7%	
1.5 General Outreach		\$ 13,700	\$ 9,700	-29%	
1.6 Website Updates - Maintenance / Hosting		\$ 7,400	\$ 7,714	4%	
2 Model Improvements					
Ventucopa Management Area Model Updates					
2.1 Incorporate SBCF Investigation Findings into Model	New item		\$ 31,680		
2.2 Develop hydrologic model for foothill areas upstream of SBCF	New item		\$ 26,640		
2.3 Develop subsurface flows from Quatal Canyon and Ozena	New item		\$ 21,740		
2.4 Develop hydraulic model of Cuyama River upstream of SB Canyon	New item		\$ 41,980		
2.5 Perform Evapotranspiration Study	New item		\$ 70,570		
2.6 Evaluate Irrigation Efficiency/Methods	New item		\$ 48,145		
2.7 Conduct Infiltration Rate Study	New item		\$ 44,695		
3 GSP Implementation Support					
3.1 GSP Implementation Program Management		\$ 59,200	\$ 62,830	6%	
3.2 GW Levels and GWQ Monitoring Network Coordination and Data Mgmt		\$ 27,500	\$ 29,350	7%	
3.3 Support for CBGSA response to DWR and public comments on 2025 GSP		\$ 48,500	\$ 51,710	7%	
3.4 Support for Adaptive Management of Groundwater Levels		\$ 25,000	\$ 26,580	6%	
3.5 Prepare Annual Report for Cuyama Basin		\$ 48,800	\$ 55,580	14%	
3.6 Develop Approach for ISW Analysis	New item		\$ 7,840		
3.7 Assess Water Quality Data Collection Approach	New item		\$ 7,260		
4 Pumping Allocation and Water Use Analysis Support					
4.1 CMA: Allocation Exchange Support		\$ 1,400	\$ 1,490	6%	
4.2 CMA: Carryover Policy Support		\$ 1,600	\$ 1,730	8%	
4.3 Detailed Assessment of Increased Water Use	New item		\$ 55,260		
Expand Allocations Outside Management Area (Consider During Annual AR)	Removed	\$ 52,300			
Expand Allocations in Ventucopa	Removed	\$ 39,100			
5 Improve Understanding of Basin Water Use					
5.1 Perform Annual Land Use Survey (Land IQ and Local Reporting)		\$ 14,000	\$ 48,245	245%	
5.2 Develop Opti DMS tool for local landowner use reporting and processing	New item		\$ 14,290		
5.3 Historical Land Use Update (Land IQ)	New item		\$ 152,687		
Enhance Existing CIMIS Station & Implement New Stations	Removed	\$ 5,000			
Perform Additional Santa Barbara Canyon Fault Investigation	Removed	\$ 167,700			
6 Install Telemetry for Monitoring Network (W&C + Sub)	New item		\$ 78,480		
7 As-Needed Technical Tasks					
7.1 Preparation of grant proposal		\$ 45,100	\$ 48,310	7%	
7.2 Support for DWR Technical Services (TSS)		\$ 10,000	\$ 10,760	8%	
Grant Admin (SGM Round 1)	Removed	\$ 30,000			
8 Adjudication Support (if Required)		\$ 38,450		-100%	Adjudication costs to be updated following Board direction.
Subtotal		\$ 731,950	\$ 1,058,501	45%	
E OTHER TECHNICAL					

CATEGORY	New / Removed	2025-26 Budget	2026-27 Budget	% Change	Ad hoc recommendation
1 Quarterly GW Levels and Piezometer Monitoring (Contractor TBD)		\$ 50,000	\$ 50,000	0%	
2 Annual WQ Monitoring (Contractor TBD)		\$ 25,000	\$ 30,000	20%	
3 Annual Stream Gauge Maintenance (USGS)		\$ 53,200	\$ 53,200	0%	
4 Telemetry Cost Savings					
	Subtotal	\$ 128,200	\$ 133,200	4%	
TOTAL		\$ 1,575,500	\$ 1,869,600	19%	

Options to Reduce Costs Related to the Standing Advisory Committee Meeting

SAC Meeting Option	Ad hoc Recommendation	Assumptions	Cost Per Meeting	Cost Per Yr (6 mtgs)
1 Current Cost Estimate		No meeting time limit, GB/TB in person, BVL + legal online	\$ 16,356	\$ 98,135
2 Limited In-person Support		No meeting time limit, GB in-person, TB/BVL online, no legal	\$ 12,497	\$ 74,980
3 Fixed Meeting Time + No Legal		3 hr meeting limit, GB/TB in person, BVL online, no legal	\$ 11,800	\$ 70,797
4 No Legal, But No Time Restrictions		GB/TB in-person, BVL online	\$ 10,861	\$ 65,164
5 No Legal & Limited Technical Support (3 hour limit)	✓	GB/TB in-person, BVL online for up to 3 hours, no legal	\$ 9,694	\$ 58,165
6 Limited In-person + Fixed Meeting Time		3 hr meeting limit, GB in-person, TB/BVL online, no legal	\$ 8,100	\$ 48,602

GB/TB = Grace Bianchi, and Taylor Blakslee (Administration)

BVL = Brian Van Lienden (Technical support)



TO: Standing Advisory Committee
Agenda Item No. 9a

FROM: Brian Van Lienden, Woodard & Curran

DATE: April 30, 2026

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



Mar-Apr Accomplishments

- ✓ Prepared draft technical memorandum with responses to DWR questions on 2025 GSP Update
- ✓ Participated in coordination meetings with DWR
- ✓ Developed final Annual Report for WY 2024-2025 and submitted to DWR
- ✓ Assisted with budget estimation for FY 2026-27
- ✓ Performed website and DMS updates
- ✓ Prepared final documentation for grant reporting and submitted to DWR for grant close-out



TO: Standing Advisory Committee
Agenda Item No. 9b

FROM: Brian Van Lienden, Woodard & Curran

DATE: April 30, 2026

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

April 30, 2026



Update on Grant Funded Projects

- CIMIS stations have been installed at both sites
 - Data is being collected and will be available on DWR's website soon
- Work on all grant components is complete
- All grant documentation is complete and has been submitted to DWR



TO: Standing Advisory Committee
Agenda Item No. 10c

FROM: Taylor Blakslee, Hallmark Group

DATE: April 30, 2026

SUBJECT: Report on Final 2025 Basin-wide Groundwater Use, 2025 CMA Allocation Compliance, and CMA Groundwater Allocation Exchanges

Recommendation

None; information only.

Discussion

On March 5, 2025, the Cuyama Basin Groundwater Sustainability Agency (CBGSA) Board of Directors directed staff to present an annual report on reported groundwater pumping and use. The 2025 Basin-Wide Groundwater Use Report is provided as **Attachment 1**.

The CBGSA began collecting water use information in 2019 and Attachment 1 summarizes reported groundwater use by landowners from 2019 through 2025. A key distinction in the datasets is that meters were required and largely installed by 2022. As a result, reported pumping from 2022 through 2025 primarily reflects metered groundwater use (gross extractions). For 2019 through 2021, reported water use was largely based on crop factors or other reporting methods used to determine net water use.

The final 2025 Central Management Area Allocation Report is provided as **Attachment 2**.

In November 2025, the Board adopted Rules and Regulations for the Transfer of Groundwater Allocations as a one-year pilot program beginning January 1, 2026. Consistent with the adopted policy, staff will provide a report of any allocation exchanges that have occurred. Since January 1, 2026, there have been no requests to transfer groundwater allocations.

Cuyama Basin 2025 Water Use

DM= 2AFY / per well

No.	Reporting Entity	2019 AF	2020 AF	2021 AF	2022 AF	2023 AF	2024 AF	2025 AF
1	Anderson Development					2.07	40.83	233.33
2	Ann Buck					104.40	111.50	116.20
3	Apache Canyon Ranch	323.93	318.65	322.40	357.45	327.96	339.55	346.84
4	Bolthouse Farms, Inc.	6,004.60	8,267.22	6,432.20	11,317.03	7,809.44	9,340.12	9,453.64
5	Bosma and Ricci	DM	-	-	13.62	24.51	24.51	26.51
6	Brodiaea, Inc. (Grapevine/North Fork)	702.79	757.54	790.54	835.97	798.35	953.96	921.78
7	CCSH Farms					99.40	107.00	124.40
8	Ceferino Cheng	-	104.65	110.63	159.24	117.00	131.60	141.20
9	Cuyama Community Services District (CCSD)	94.97	98.71	113.20	119.77	148.34	158.79	175.54
10	Hoekstra Family Trust	495.45	551.41	924.86	632.04	230.73	342.33	300.59
11	Cuyama Orchards	878.47	878.47	966.32	1,056.90	875.22	1,120.60	973.10
12	David Lewis	10.22	10.22	42.74	30.19	34.01	43.27	35.75
13	Double H Farming, LLC (formerly Triple H)	358.80	358.80	358.80	382.16	104.50	113.50	118.70
14	Duncan Family Farms, LLC/Aguila G Boys	2,048.00	2,048.00	2,048.00	18.00	119.83	52.68	4.48
15	E&B Natural Resources	22.04	22.41	23.01	21.44	24.35	24.26	25.99
16	Feinstein Investments/JR Investments	174.25	174.25	78.80	51.33	268.88	544.87	1,079.95
17	Grimmway Enterprises, Inc.	10,184.00	10,454.70	9,401.10	17,213.27	12,251.88	13,379.35	9,774.10
18	Harrington Farms	135.00	135.00	196.94	135.84	111.19	162.68	200.40
19	Highland Vineyard SB, LLC	-	1,180.69	1,004.77	1,675.78	1,832.00	1,546.46	729.13
20	M&A Family Farms	20.93	20.93	20.93	20.93	20.93	31.81	31.87
21	JHP Global/Joo Capital	391.50	391.50	356.40	347.02	365.28	354.30	371.06
22	Karam Pistachio Farm	-	-	-	305.52	480.38	511.82	591.15
23	Kern Ridge Growers, LLC	1,558.04	1,544.00	1,587.08	3,033.23	2,673.37	2,770.28	2,957.29
24	Lear Real Estate Enterprises	-	457.60	290.40	492.91	568.21	460.76	429.65
25	Lucky Dog Ranch	284.05	328.90	287.04	344.25	343.00	350.00	382.60
26	Belden Family Trust	272.80	264.00	237.60	585.35	113.30	349.29	410.74
27	Sunridge Nurseries	364.00	446.40	553.26	1,141.22	1,032.00	462.89	454.62
28	Sunrise Olive Ranch, LLC	1,075.00	1,075.00	1,924.74	1,761.57	1,726.11	1,825.17	2,060.03
29	The Ranch	72.87	18.63	18.50	18.50	18.50	18.50	18.50
30	Triangle E. Farms	981.90	514.37	358.11	234.27	580.75	527.43	586.18
31	Tri-County Pistachio	941.85	832.70	911.95	1,876.00	1,118.00	1,090.00	999.23
32	Yeguada Trujillo			20.00	220.00	36.00	33.05	110.54
33	El Rancho Espanol	3.99	1.53	0.34	DM	DM	3.17	3.96
	Other (De Minimis)	56.48	14.21	7.92	24.49	30.94	11.81	29.80
Total Base-Wide Reported Pumping		27,456	31,270	29,389	44,425	34,391	37,338	34,219

Cuyama Basin 2025 Allocations vs Reported Use

Grouping	Subgroup/ Farming Unit Components	Area in 2025-2029 CMA + Farming Unit (Acres)	2025 Allocations (AF)	Reported Pumping (AF)	Percent Used	
1	2961 Highway LLC/Yeguada Trujillo	n/a	468.0	792.14	25.99	3%
2	Ann Buck	n/a	40.0	139.88	9,774.10	6988%
3	Bolthouse Farms, Inc.	Total Wm. Bolthouse Farms	13,495.20	19,184.47	3,197.89	17%
		<i>Belden Family</i>		7,323.15	116.20	
		<i>Bolthouse Land Company</i>		10,657.16	2,957.29	
		<i>Bolthouse Properties</i>		501.08		
		<i>Cuyama Solar</i>		124.99		
		<i>Lear Real Estate Enterprises</i>		578.09	124.40	
4	CCSH Farms	n/a	40.0	135.50	999.23	737%
5	David Lewis	n/a	85.1	120.00	586.18	488%
6	Double H Farming, LLC (formerly Triple H)	n/a	38.5	138.89	454.62	327%
7	Duncan Family Farms, LLC/Aguila G Boys	n/a	132.2	185.88	429.65	231%
8	Grimmway Enterprises, Inc	Total Grimmway	13,474.00	16,847.83	371.06	2%
		<i>Caliente Ranch Cuyama</i>		1,709.12		
		<i>Diamond Farming Co</i>		3,701.57		
		<i>Lapis Land Company</i>		4,555.19		
		<i>Ruby Land Company</i>		6,881.94		
9	Harrington Family Trust	n/a	151.5	20.22	0.00	0%
10	Hoekstra Family Trust	n/a	460.4	1,061.03	729.13	69%
11	JHP Global/Joo Capital	n/a	892.3	670.64	200.40	30%
12	Kern Ridge Growers, LLC	Total Kern Ridge Growers	1,909.10	2,479.24	1,964.74	79%
		<i>Daria Trust</i>		78.90		
		<i>Farry Michael</i>		382.54		
		<i>Kern Ridge Growers LLC</i>		2,017.81	1,964.74	
13	Sunrise Olive Ranch, LLC	Total Sunrise Olive Ranch	934.20	1,953.22	35.75	2%
		<i>Reinhard, Carl Jr. (et al)</i>		22.74		
		<i>Sunrise Ranch Properties</i>		1,930.48		
14	Tri-County Pistachio	n/a	192.0	467.12	472.62	101%
	Other	n/a	n/a	98.52		
	Total		32,312.51	44,294.60	19,241.35	43%



TO: Standing Advisory Committee
Agenda Item No. 10d

FROM: Taylor Blakslee, Hallmark Group

DATE: April 30, 2026

SUBJECT: Board of Directors Agenda Review

Recommended Motion

None – informational only.

Discussion

The Cuyama Basin Groundwater Sustainability Agency Board of Directors agenda for the May 6, 2026, Board of Directors meeting is provided as **Attachment 1**.



CUYAMA BASIN GROUNDWATER SUSTAINABILITY AGENCY

BOARD OF DIRECTORS MEETING

Board of Directors

Steve Jackson Chair, Cuyama Basin Water District

Arne Anselm Vice Chair, County of Ventura

Matthew Young Secretary, Santa Barbara County Water Agency

Cory Bantilan Treasurer, Santa Barbara County Water Agency

Derek Yurosek Cuyama Basin Water District

Deborah Williams Cuyama Community Services District

Brian Grant Cuyama Basin Water District

Kyle Richardson Cuyama Basin Water District

Jimmy Paulding County of San Luis Obispo

Katelyn Zenger County of Kern

Mark Ellsworth Cuyama Basin Water District

AGENDA

May 6, 2026

Agenda for a meeting of the Cuyama Basin Groundwater Sustainability Agency Board of Directors to be held on Wednesday, May 6, 2026, at 2:00 PM at the **Cuyama Valley Family Resource Center 4689 CA-166, New Cuyama, CA 93254**. Participate via computer at: <https://shorturl.at/CEXif> or by going to Microsoft Teams, downloading the free application, then entering Meeting ID: 285 525 814 804 96 Passcode: fc2R8yg6 or enter or telephonically at (469) 480-3918 Phone Conference ID: 955 559 561#.

Teleconference Locations:

4689 CA-166 New Cuyama, CA 93254		
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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 (Jackson) (1 min)
2. Roll Call (Bianchi) (1 min)
3. Pledge of Allegiance (Jackson) (1 min)
4. Meeting Protocols (Bianchi) (2 min)
5. Standing Advisory Committee Meeting Report (Kelly) (3 min)

CONSENT AGENDA

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

6. Approve March 4, 2026, Meeting Minutes (Jackson) (1 min)
7. Approve Payment of Bills for February and March 2026 (Blakslee) (1 min)
8. Approve Financial Reports for February and March 2026 (Blakslee) (1 min)

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.

9. Groundwater Sustainability Plan Implementation
 - a) Discuss and Take Appropriate Action on GSA Response to DWR’s Additional Information Request Regarding their Review of the Amended 2025 GSP and Periodic Evaluation (Blakslee/Van Lienden) (60 min)
 - b) Discuss and Take Appropriate Action on Potential Areas of Overdraft Outside the Central Management Area (Blakslee/Bianchi) (30 min)
 - c) Discuss and Take Appropriate Action on FY 2026-2027 Budget, Cash Flow, and Groundwater Extraction Fee Report (Blakslee) (60 min) **[Supermajority Vote Required: 75%]**
 - d) Discuss and Take Appropriate Action on Consultant Task Orders for Fiscal Year 2026-2027 (Blakslee) (15 min)

REPORT ITEMS

10. Administrative Updates
 - a) Report of the Executive Director (Blakslee) (5 min)
 - i. Report on Final 2025 Basin-wide Groundwater Use, 2025 CMA Allocation Compliance, and CMA Groundwater Allocation Exchanges
 - b) Report of the General Counsel (Collins) (5 min)
11. Technical Updates
 - a) Update on Groundwater Sustainability Plan Activities (Van Lienden) (5 min)
 - b) Update on Grant-Funded Projects (Van Lienden) (5 min)
12. Closed Session - 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)
13. Report of Ad Hoc Committees (1 min)
14. Directors’ Forum (1 min)
15. Public Comment for Items Not on the Agenda (5 min)
16. Correspondence (1 min)
17. Adjourn (4:40 p.m.)