White Wolf Subbasin Groundwater Sustainability Agency
Regular Board Meeting of the Board of Directors

Agenda
October 6, 2026 at 7:30 a.m.

Public may attend in-person, via telephone, or Web-based service:

In Person: Wheeler Ridge-Maricopa Water Storage District Headquarters
12109 Highway 166
Bakersfield, CA 93313

Or Virtual Option:
Go To Meeting: https://meet.goto.com/911605181
Call by Phone: (872) 240-3311 Access Code: 911-605-181

1. **Call to Order**
2. **Pledge of Allegiance**
3. **Recognition of Guests**
4. **Approval of Minutes of the Regular Board Meeting of July 7, 2026**
5. **Financial Accounting Report**
    a. Financials **(Robert Velasquez)**
    b. **Board Action Item:** Consider Contract Renewal with Land IQ for WY 2027-2029
6. **California Department of Water Resources (DWR) SGMA Implementation Round 2 grant update (Angelica Martin)**
7. **Updates on actions discussed or authorized on July 7, 2026 (EKI)**
    a. Update on Groundwater Sustainability Plan (GSP) implementation activities
        i. September 2026 groundwater levels
        ii. Representative Monitoring Wells for Degraded Water Quality progress
        iii. Updates on land subsidence assessment
    b. Draft 2026 Amended GSP and Periodic Evaluation
        i. Recommended revisions based on public comments received
        ii. Timeline for adoption

In compliance with the Americans with Disabilities Act, if you need disability-related modifications or accommodations, including auxiliary aids or services, please call Angelica Martin (661) 663-4262.

White Wolf Subbasin Groundwater Sustainability Agency
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8. **Correspondence**

    a. California Department of Fish and Wildlife comments on the White Wolf Subbasin (basin no. 5-022.18) draft 2026 periodic evaluation

9. **Public Comment**

At this time, the public may address the Board on any item not appearing on the agenda that is within the subject matter jurisdiction of the Board. Comments will be limited to three minutes.

10. **Consider and provide direction on future agenda items**

11. **Adjourn**

In compliance with the Americans with Disabilities Act, if you need disability-related modifications or accommodations, including auxiliary aids or services, please call Angelica Martin (661) 663-4262.

White Wolf Subbasin Groundwater Sustainability Agency
Wheeler Ridge-Maricopoa Water Storage District
12109 Highway 166, Mettler, CA 93313

MINUTES OF THE REGULAR BOARD OF DIRECTORS MEETING

Date of Meeting: Tuesday, July 7, 2026
Location: Remote and In-Person
Meeting Commenced at 7:30 a.m. with the pledge of allegiance.

DIRECTORS PRESENT: Tito Martinez, Trey Irwin, Jeff Giumarra, Dolores Salgado, Jeff Mettler
DIRECTORS REMOTE: None
ALTERNATES: None
DIRECTORS ABSENT: Colby Fry

PUBLIC AND STAFF: Alanna Godell from DWR, Christina Lucero, Sarah Gerenday, Robert Velasquez, Michael Miller, Sheridan Nicholas, Michelle Nop, Jeevan Muhar, and Legal Counsel Alan Doud.

Chairman Martinez did a recognition of guests and continued to the review of the draft meeting minutes of the Regular Board Meeting of June 2, 2026. On motion by Director Mettler, and seconded by Director Irwin, the minutes were unanimously approved.

Robert Velasquez presented the financials and explained the budget and status of financials as of June 30th. There were no questions and on motion by Director Irwin, seconded by Director Giumarra, the financials were unanimously approved.
Mr. Velasquez presented the 2026-2027 Fiscal Budget. The Board's Chairman asked if there were any tasks/projects specific to this budget to which Christina Lucero answered there weren't. On motion by Director Mettler, seconded by Director Irwin, 2026-2027 Fiscal Budget was unanimously approved.

Christina explained that LandIQ costs have been covered by the grant, and that for the upcoming fiscal year that expense will no longer be covered by grant fundings. She explained that the Technical Committee has begun discussions about other options. After further discussion it was agreed that the Committee will bring more detailed information to the board, such as number of wells with meter in the basin, data comparison between ET and well meter readings, etc., to help further the conversation.

Ms. Martin provided an update on the amendment request to DWR to allow relocation of money. She also advised that payment for invoice #8 had been received and invoice #9 was under review by DWR.

Christina Lucero presented groundwater levels for the months of May. No undesirable results and minimum threshold exceedance were reported.
Christina provided findings regarding the Board's request to bring, for further consideration and discussion, an estimated cost for testing the Tut Bros wells, as well as identify other wells that can potentially be used instead. It was informed that the Tut Bro wells are currently non-operational and a quote of $4,700 was provided by Bakersfield Well and Pump. Regarding a new proposed network, it would require coordination with owners of the Grapevine RV Park and Cuyama Orchards, and establishing Sustainable Management Criteria (SMCs) at these sites. The Board asked that the owners of these two locations be contacted and an update be brought to the next board meeting for discussion and consideration. Meanwhile, the board voted on the option of approving the quote of $4,700 to have as a back-up. On motion by Director Salgado, seconded by Director Mettler, the motion was unanimously approved by the Board.

Christina continued to talk about the GSP revisions, specifically the four corrective actions pointed out in DWR's GSP approval letter from 2023.

Ms. Martin provided an update on correspondence.

There was no public comment.

There will be no August Board meeting, and the next regular board meeting is scheduled for September 1, 2026.

There was no closed session.

On motion by Director Irwin, seconded by Director Salgado, the White Wolf GSA meeting was adjourned at 8:34 a.m.

_____

Angelica Martin, Secretary, White Wolf Subbasin GSA

Approved by: White Wolf Subbasin GSA Board of Directors Dated: October 6, 2026

WHITE WOLF SUBBASIN GSA

ANNUAL FINANCIAL STATEMENT – FISCAL YEAR 2026-2027

Fiscal Year 2026-2027 | Year-to-Date Ending August 31, 2026

Kern County, California — Sustainable Groundwater Management Act

Account Description	PTD Actual (Aug-26)	PTD Budget (Aug-26)	Variance	YTD Actual (FY2027)	YTD Budget (FY2027)	Variance	Annual Budget (FY2027)
STATEMENT OF REVENUES							
DWR Grant / SGM Proceeds	$0	$0	$0	$0	$0	$0	$0
Member Agency Funding	$0	$0	$0	$0	$168,000	($168,000)	$643,700
Interest Income	$13	$150	($137)	$58	$300	($242)	$1,800
TOTAL REVENUES	**$13**	**$150**	**($137)**	**$58**	**$168,300**	**($168,242)**	**$645,500**
STATEMENT OF EXPENDITURES							
Professional Services – Consulting (EKI)	$37,237	$60,879	$23,642	$90,330	$113,775	$23,446	$580,800
Professional Services – Legal (Young Wooldridge)	$925	$1,028	$103	$1,628	$3,516	$1,888	$8,600
Professional Services – General (Land IQ & WR)	$0	$4,225	$4,225	$4,139	$8,450	$4,312	$50,700
Canal / Expansion Turnout Reimbursements	$0	$0	$0	$0	$0	$0	$0
Bank Fees	$116	$160	$44	$425	$310	($115)	$1,600
Miscellaneous (Postings, etc.)	$0	$167	$167	$0	$330	$330	$2,000
TOTAL EXPENDITURES	**$38,278**	**$66,459**	**$28,181**	**$96,521**	**$126,381**	**$29,860**	**$643,700**
NET CHANGE IN FUND BALANCE	**($38,265)**	**($66,309)**	**$28,044**	**($96,463)**	**$41,919**	**($138,382)**	**$1,800**
BALANCE SHEET SUMMARY							
Cash – Wells Fargo Operating Account	*N/A*	*N/A*	*N/A*	$1,127	*N/A*	*N/A*	*N/A*
Accounts Receivable – Trade	*N/A*	*N/A*	*N/A*	$999,838	*N/A*	*N/A*	*N/A*
Accounts Receivable – Interco	*N/A*	*N/A*	*N/A*	$3,075	*N/A*	*N/A*	*N/A*
TOTAL NET ASSETS				**$1,004,040**			

WHITE WOLF SUBBASIN GSA

CHECK REGISTER & BANK RECONCILIATION | FY2027 Year-to-Date

Wells Fargo Account #4128356011 | July 1, 2026 – August 31, 2026

Check #	Date	Payee	Description / Category	Amount	Status	Running Balance
Beginning Balance – July 1, 2026 (FY2027 Opening, per Books)						**$168,538.51**
1129	Jul 02, 2026	Erler & Kalinowski, Inc.	Professional Services – Consulting (EKI)	-$71,257.50	Cleared	**$97,281.01**
1130	Jul 23, 2026	Erler & Kalinowski, Inc.	Professional Services – Consulting (EKI)	-$53,092.25	Cleared	**$44,188.76**
1131	Jul 30, 2026	Young Wooldridge	Professional Services – Legal	-$703.00	Cleared	**$43,485.76**
1132	Jul 30, 2026	Land IQ LLC	Professional Services – General	-$4,138.50	Cleared	**$39,347.26**
INT	Jul 31, 2026	Wells Fargo Bank	Interest Earned (Jul)	$44.81	Cleared	**$39,392.07**
Balance – July 31, 2026 (ties to Trial Balance)						***$39,392.07***
ACH	Aug 11, 2026	Wells Fargo Bank	Bank Service Charge	-$116.02	Cleared	**$39,276.05**
1133	Aug 27, 2026	Erler & Kalinowski, Inc.	Professional Services – Consulting (EKI)	-$37,237.25	Cleared	**$2,038.80**
1134	Aug 27, 2026	Young Wooldridge	Professional Services – Legal	-$925.00	Cleared	**$1,113.80**
INT	Aug 31, 2026	Wells Fargo Bank	Interest Earned (Aug)	$13.30	Cleared	**$1,127.10**
Ending Balance – August 31, 2026 (Reconciled: Books = Bank)						**$1,127.10**

Total FY2027 Disbursements (Checks + Fees)	**-$167,469.52**
Total FY2027 Credits (Interest)	**$58.11**
Net Change in Cash – FY2027 YTD	**-$167,411.41**

WHITE WOLF SUBBASIN GROUNDWATER SUSTAINABILITY AGENCY

Statement of Net Position (Balance Sheet)

As of August 31, 2026 | Fiscal Year 2026-2027

	Aug-26
ASSETS	
Current Assets	
Cash and Cash Equivalents	1,127
Accounts Receivable - Trade	999,838
Intercompany Receivable - Net	3,075
Total Current Assets	**1,004,040**
TOTAL ASSETS	**1,004,040**
LIABILITIES	
Current Liabilities	
Accounts Payable - Trade	-
Total Current Liabilities	**-**
TOTAL LIABILITIES	**-**
FUND EQUITY / NET POSITION	
Retained Earnings / Fund Balance (Beginning)	1,100,503
YTD Net Surplus (Revenues Over Expenditures)	(96,463)
Total Fund Equity / Net Position	**1,004,040**
TOTAL LIABILITIES AND FUND EQUITY	**1,004,040**

White Wolf Groundwater Sustainability Agency

Arvin-Edison Water Storage District
Tejon-Castac Water District
Wheeler Ridge-Maricopa Water Storage District
Kern County

AGENDA MEMORANDUM

Date: 6 October 2026

To: Board of Directors, White Wolf Groundwater Sustainability Agency (GSA)

From: Angelica Martin, Secretary, White Wolf GSA

Item: 5b. Consider Contract Renewal with Land IQ for WY 2027-2029

SUMMARY

Fiscal Impact: $162,729 over three years. Recommend retaining existing cost breakdown by GSA-member District; varies based on irrigated acreage, 50% split for overlap lands, and a three-way split for white area lands:

District	3-Year Cost	Acres	Percent Split	Cost / Acre
WRMWSD	$81,853	54,073	50.3%	$1.51
AEWSD	$41,170	27,186	25.3%	$1.51
TCWD	$39,706	26,273	24.4%	$1.51
	$162,729	107,532	Total Basin Acres	

BACKGROUND

Annual Reports are required to include a summary of the Basin's groundwater extraction data by water use sector. Unmetered agricultural pumping has historically been estimated by the Basin's Soil Moisture Budget (SMB) Accounting model and input into the White Wolf Groundwater Flow Model (WWGFM). The SMB requires parcel-based crop evapotranspiration (ETc) estimates to calculate the agricultural demands. The SMB then estimates groundwater pumping by satisfying any unmet agricultural demand, after precipitation and applied surface water, and with consideration for irrigation efficiency. Agricultural pumping is also used in the WWGFM to estimate changes in storage. Land IQ provides ground-truthed satellite ETc estimates at the field or parcel level for cropped and non-cropped lands (excluding urban areas).

For the 2026 Draft GSP and Periodic Evaluation and the Annual Reports for Water Years (WY) 2022 through 2025, parcel-based satellite ETc data was obtained from Land IQ. ETc data from Land IQ is currently used in the water budget for the Kern County Subbasin and by WRMWSD to calculate groundwater service charges for unmetered wells.

DISCUSSION

Until the GSA transitions to collecting metered groundwater extraction data, the GSA will need to obtain monthly ETc data to support Annual Reporting requirements. Contracting with Land IQ will maintain consistency with calculations from prior years and in the Kern County Subbasin. It will also avoid duplicative costs for the areas that currently overlap existing contracts.

The GSA's existing contract with Land IQ expired at the end of September 2026. Land IQ has proposed a renewed contract for providing ETc data in the Basin over the next three water years, beginning at $52,648 for the first year (WY 2027) with a 3% per year cost increase each following year, as noted in the table below. The total cost over three years would be $162,729.

	Current	Proposed - 3 Years		
White Wolf Subbasin	Oct, 2022 - Sep, 2026	Oct 1, 2026 - Sep 30, 2027	Oct 1, 2027 - Sep 30, 2028	Oct 1, 2026 - Sep 30, 2029
Cropped Acreage	36,303	36,341		
Escalation	none	6%	3%	3%
$/Ac/Yr	$0.63	$0.67	$0.69	$0.71
Annual Cost	$22,870.89	$24,268.52	$24,996.58	$25,746.47
Non-Cropped Acreage	70,503	70,455		
Escalation	none		3%	3%
$/Ac/Yr	$0.38	$0.40	$0.41	$0.43
Annual Cost	$26,791.14	$28,379.27	$29,230.65	$30,107.57
Total Annual Cost	$49,662.03	$52,647.79	$54,227.23	$55,854.04
Total Monthly Cost	$4,138.50	$4,387.32	$4,518.94	$4,654.50

Given that Land IQ costs vary between crop and non-cropped acreage, the recommended approach is based on a 50% WRMWSD, 25% AEWSD, and 25% TCWD acreage allocation, where costs within overlapping districts are split 50/50 and all white areas outside district service areas are split equally three-ways. This is the same cost-share used for the WY 2023-2026 contract.

Alternatively, ETc data can be obtained from Open ET, an online platform that allows free viewing and limited downloads of ETc as a map or time series. Unlike Land IQ, Open ET does not maintain land-based meteorological stations for ground truthing or conduct field level crop mapping. Instead, Open ET relies on California Irrigation Management System (CIMIS) meteorological data from the Department of Water Resources (DWR) and treats all land uses the same. When compared with Land IQ, Open ET tends to provide higher ETc numbers for the same parcels. While there is no fee to view ETc data from OpenET online, downloading Basinwide data needed for the SMB requires enterprise access. Basinwide data can be downloaded for a fee through Google Earth Engine or obtained from DWR through the Department's existing contract with Land IQ; however, the data provided by DWR is published with a significant lag. For these reasons, and for consistency with the Kern County Subbasin methodology, it is recommended that the GSA continue to contract with Land IQ for ETc data rather than obtaining it from OpenET.

The GSA may consider transitioning to collecting metered pumping data instead of relying on ET data in the future. Metered data is more accurate, and recent field surveys suggest that over half of the Basin's active production wells have existing meters. WRMWSD encourages growers to submit metered pumping data for the groundwater service charge, and AEWSD has installed and collects metered data on 50 wells (five within White Wolf Subbasin). The California Water Code (CWC) 10725.8(b) states that if a GSA

requires metering, the metering equipment shall be paid for by the pumper;[1] the White Wolf GSA therefore has the authority to adopt a groundwater metering and reporting policy and would only be required to pay for ongoing operations and maintenance of a reporting system.

[1] CWC 10725.8. (b): All costs associated with the purchase and installation of the water-measuring device shall be borne by the owner or operator of each groundwater extraction facility. The water measuring devices shall be installed by the groundwater sustainability agency or, at the groundwater sustainability agency's option, by the owner or operator of the groundwater extraction facility. Water-measuring devices shall be calibrated on a reasonable schedule as may be determined by the groundwater sustainability agency.

From: Casey Gudel <cgudel@landiq.com>
Sent: Thursday, September 3, 2026 9:41 AM
To: Angelica Martin <amartin@tejonranch.com>; Christina Lucero <clucero@ekiconsult.com>
Cc: Joel Kimmelshue <Jkimmelshue@landiq.com>; Kylie Applemun <kapplemun@landiq.com>; Stephanie Tillman <Stillman@landiq.com>; Adriana Joosep <ajoosep@landiq.com>
Subject: Land IQ ET - Contracting for White Wolf Subbasin

⚠ EXTERNAL EMAIL – Use Caution Before Clicking Links or Opening Attachments.

Good Morning –

I am reaching out as our current three-year contract for monthly ET is close to being expired. We truly appreciate the opportunity to work with you and are excited to continue that working relationship. As such, we are providing you with a scope of work to continue the same services. While we have kept our price at $0.63/cropped acre/year and $0.38/non cropped acre/year for this past contract (3 years), we will need to increase our price to $0.67/cropped acre/year and $0.40/non cropped acre/year with a 3% escalation each year thereafter.

We would suggest beginning this new scope of work with the beginning of the water year, starting October 1, 2026. The updated cost over the next three years would be:

	Current	Proposed - 3 Years		
White Wolf Subbasin	**Oct, 2022 - Sep, 2026**	**Oct 1, 2026 - Sep 30, 2027**	**Oct 1, 2027 - Sep 30, 2028**	**Oct 1, 2026 - Sep 30, 2029**
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Total Annual Cost	$49,662.03	$52,647.79	$54,227.23	$55,854.04
Total Monthly Cost	$4,138.50	$4,387.32	$4,518.94	$4,654.50

We can either add this to your current contract as an amendment or start fresh and update the contracting documents.

Please let me know how you would like to proceed!

Thanks, Casey

Casey Gudel, MS
Client Relations & Project Manager
LAND IQ
2020 L Street, Suite 210
Sacramento, CA 95811
Cell: 530-514-2562
Email: cgudel@landiq.com
www.LandIQ.com
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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
wildlife.ca.gov

September 11, 2026

Via Electronic Mail

Angelica Martin
Water Resources Director
White Wolf Groundwater Sustainability Agency
4436 Lebec Road
Lebec, California 93243
Email: amartin@tejonranch.com

Subject: CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE COMMENTS ON THE WHITE WOLF SUBBASIN (Basin No. 5-022.18) DRAFT 2026 PERIODIC EVALUATION

Dear Angelica Martin:

The California Department of Fish and Wildlife (CDFW) is providing comments on the White Wolf Groundwater Sustainability Agency (GSA) Draft White Wolf Subbasin Periodic Evaluation (Draft PE) and amended Groundwater Sustainability Plan – White Wolf Subbasin - June 2026 – Public Review Draft (Draft Amended GSP) made available to the public on July 7, 2026, and prepared pursuant to the Sustainable Groundwater Management Act (SGMA). The Basin is designated as Medium Priority under SGMA. While the comment period may have ended, CDFW respectfully requests that the GSA still consider our comments.

CDFW is writing to support ecosystem preservation and enhancement in compliance with SGMA, and its implementing regulations, based on CDFW expertise and best available information and science. CDFW has an interest in the sustainable management of groundwater, as many sensitive ecosystems, species, and public trust resources depend on groundwater and interconnected surface water (ISW), including groundwater dependent ecosystems (GDEs). In the context of SGMA statutes and regulations, and Public Trust Doctrine considerations, groundwater planning should carefully consider and protect environmental beneficial uses and users of groundwater, including fish and wildlife and their habitats, GDEs, and ISW. CDFW has enclosed, for reference, a summary of GSP requirements and GSA obligations with respect to the protection of fish and wildlife and public trust resources (Attachment A).

COMMENTS AND RECOMMENDATIONS

CDFW reviewed the Draft PE and Draft Amended GSP and believes that it fails to adequately address the following Recommended Corrective Action identified in the Department of Water

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Resources (DWR) Statement of Findings Regarding the Approval of the San Joaquin Valley – White Wolf Subbasin Groundwater Sustainability Plan (Statement of Findings):

DWR Recommended Corrective Action 2: "Revise the sustainable management criteria to be based on seasonal low groundwater levels to ensure potential impacts to beneficial uses and users are considered."

In the DWR Statement of Findings, Section 4.3.2.6, it states:

> "In the next periodic update to the Plan, the GSA should provide an update on whether interconnected surface water exists in the Plan area. If it is determined that interconnected surface water is present, the GSA should provide an estimate of the quantity and timing of depletions of those interconnected surface water systems and establish a monitoring network and sustainable management criteria for this sustainability indicator."

CDFW Response and Recommendation: CDFW is concerned that other aquifers within the White Wolf subbasin, potentially supporting ISWs and GDEs, are not evaluated as principal aquifers because they are considered hydrologically disconnected from the Principal Aquifer as identified by the Draft Amended GSP. The Draft PE concludes that ISWs disconnected from the Principal Aquifer are not subject to GSA management and therefore discounted in the Amended Draft GSP.

Section 6.2.6 'Interconnected Surface Water' of the Draft PE states in part:

> "…monitoring and assessment performed during GSP implementation and the development of this Periodic Evaluation indicate that these water features are not connected to the Principal Aquifer. As such, ISW is not present in the Basin."

From the California Code of Regulations, Title 23, Sub-article 1, section 354.8, Description of the Plan Area, there is no mention of a plan area being limited to the principal aquifer(s). Figure 6 of the Draft Amended GSP indicates that the whole of the White Wolf subbasin is covered by the GSA plan area and its boundary is not limited to the Principal Aquifer. Additionally, a plan area may have more than one principal aquifer as defined from the California Code of Regulations, Title 23, Article 2. section 351, subdivision (aa) – Definitions (aquifers):

> ""Principal aquifers" refer to aquifers or aquifer systems that store, transmit, and yield significant or economic quantities of groundwater to wells, springs, or surface water systems."

CDFW acknowledges that the shallow aquifer upgradient of the Spring Fault may not be hydrologically connected to the Principal Aquifer on the valley floor. However, there is the potential in the future for this shallow aquifer to economically meet the definition of a principal aquifer system with the pending Tejon Ranch development projects. The upgradient shallow aquifer currently stores, transmits, and yields ecologically significant quantities of groundwater to areas with significant groundwater dependent environmental resource value, such that the GSA should consider shallow aquifers within the White Wolf subbasin as principal aquifers. This is important, because if there is an increase in groundwater pumping in these areas in the future, due to increased development and economic demand, there is a risk to the ecosystems including ISWs and GDEs.

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CDFW is also concerned that the GSA discounts consideration of not just ISWs but also GDEs because they are not considered connected to the Principal Aquifer. The Draft PE (Section 1, p. 1-2) states:

> "Since neither these ecosystems, nor the ephemeral streams are connected to the Principal Aquifer, these features are not considered Interconnected Surface Water (ISW) or Groundwater Dependent Ecosystems (GDEs) subject to White Wolf GSA management under the White Wolf GSP."

There are several locations within the White Wolf subbasin where GDEs have been identified within shallower aquifers hydrologically disconnected from the Principal Aquifer, including the Tejon Ranch Grapevine Specific and Community Plan area as well as large areas of existing and proposed conservation easements related to the Tejon Ranch developments. Because these GDEs are considered outside the Principal Aquifer, they are not considered subject to GSA management under the Amended Draft GSP.

Several GDE vegetation alliances have been identified and mapped outside of the Principal Aquifer in the White Wolfe subbasin including the following which are named by their dominant species: Fremont Cottonwood (*Populus fremontii*), Valley Oak (*Quercus lobata*), Willow (*Salix* spp), Red Willow (*Salix laevigata*), Mule Fat (*Baccharis salicifolia*), Tamarix spp. (*Tamarix* spp.), and California Grape (*Vitis californica*). Ephemeral streams associated with these GDEs within the White Wolf subbasin include Tecuya Creek, Grapevine Creek, Pastoria Creek, Tunis Creek, El Paso Creek, Caparell Creek, and Tejon Creek. (TNC 2026).

In addition to GDEs, CDFW has a vested interest in environmental beneficial uses and users of groundwater including several fish and wildlife species which utilize GDEs and their associated streams. For the GDE alliances discussed above this includes the following special-status species: State and federally endangered and State fully protected California condor (*Gymnogyps californianus*) and blunt-nosed leopard lizard (*Gambelia sila*); State and federally endangered least Bell's vireo (*Vireo bellii pusillus*) and Bakersfield cactus (*Opuntia basilaris* var *treleasei*); State endangered and federally threatened western yellow billed cuckoo (*Coccyzus americanus occidentalis*); State endangered willow flycatcher (*Empidonax trailii*); State and federally threatened San Joaquin kit fox (*Vulpes macrotis mutica*);State threatened Swainson's hawk (*Buteo swainsoni*) and Tehachapi slender salamander (*Batrachoseps stebbinsi*); and State candidate western spadefoot (*Spea hammondii*), western burrowing owl (*Athene cunicularia hypugaea*), and Crotch's bumblebee (*Bombus crotchii*)(CDFW 2026).

As indicated by DWR in the quote above from the Statement of Findings, ISW should be identified in the GSA plan area, that is to say anywhere ISW exists in the White Wolf subbasin. Likewise, under California Code of Regulations, Title 23, section 354.16, subdivision (g), GSPs must identify and consider GDEs within the GSA plan area using available data, regardless of whether these resources are influenced by pumping in the Principal Aquifer. Therefore, the ISW and GDE present throughout the GSP boundary should be accounted for under SGMA in the GSP.

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CONCLUSION

In conclusion, CDFW deems the Draft Amended GSP insufficient in its consideration of GDEs, ISW, and environmental beneficial uses and users of groundwater including fish and wildlife and their habitats. CDFWs comments further indicate that the Draft Amended GSP fails to sufficiently address Recommended Corrective Actions previously identified by DWR and thus may warrant a determination of incompletion.

CDFW has included a summary of GSP regulatory requirements pertaining to the protection of fish and wildlife (Attachment A) for your reference.

CDFW appreciates the opportunity to provide comments on the White Wolf subbasin Draft PE and Draft Amended GSP. If you have any further questions, please contact Annette Tenneboe (Annette.Tenneboe@wildlife.ca.gov).

Sincerely,

DocuSigned by:
Julie Vance
FA83F09FE08945A...

Julie A. Vance
Regional Manager, CDFW Central Region

Enclosures (Attachment A) (Attachment B)

ec: California Department of Fish and Wildlife

Brooke Jacobs, Branch Chief
Water Branch
Brooke.Jacobs@wildlife.ca.gov

Robert Holmes, Environmental Program Manager
Statewide Water Planning Program
Robert.Holmes@wildlife.ca.gov

Adam Weinberg, Statewide SGMA Coordinator
Groundwater Program
Adam.Weinberg@wildlife.ca.gov

California Department of Water Resources

Matt Owens
DWR SGMA Point of Contact
South Central Region Office
Matthew.Owens@water.ca.gov

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Paul Gosselin, Director
Sustainable Groundwater Management Office
Paul.Gosselin@water.ca.gov

National Marine Fisheries Service

Dan Wilson, Branch Chief
West Coast Region
Dan.Wilson@noaa.gov

State Water Resources Control Board

Natalie Stork, Director
Office of Sustainable Groundwater Management
Natalie.Stork@waterboards.ca.gov

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Attachment A

Summary of GSP Requirements and GSA Obligations With Respect to the Protection of Fish and Wildlife and Public Trust Resources

As trustee agency for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species (Fish & G. Code, §§ 711.7 and 1802). SGMA and its implementing regulations afford ecosystems and species specific statutory and regulatory consideration, including the following as pertinent to GSPs:

GSPs must consider impacts to GDEs (Water Code, § 10727.4, subd. (l); see also Cal. Code Regs., tit. 23, § 354.16, subd. (g));

GSPs must consider the interests of all beneficial uses and users of groundwater, including environmental users of groundwater (Water Code, § 10723.2) and GSPs must identify and consider potential effects on all beneficial uses and users of groundwater (Cal. Code Regs., tit. 23, §§ 354.10, subd. (a), 354.26, subd. (b)(3), 354.28, subd. (b)(4), 354.34, subds. (b)(2), & (f)(3));

GSPs must establish sustainable management criteria that avoid undesirable results within 20 years of the applicable statutory deadline, including depletions of ISW that have significant and unreasonable adverse impacts on beneficial uses of the surface water (Cal. Code Regs., tit. 23, § 354.22 et seq. and Water Code §§ 10721, subd. (x)(6) and 10727.2, subd. (b)) and describe monitoring networks that can identify adverse impacts to beneficial uses of ISW (Cal. Code Regs., tit. 23, § 354.34, subd. (c)(6)(D)); and

GSPs must account for groundwater extraction for all water use sectors, including managed wetlands, managed recharge, and native vegetation (Cal. Code Regs., tit. 23, §§ 351, subds. (a) & (l) and 354.18, subd. (b)(3)).

Furthermore, the Public Trust Doctrine imposes a related but distinct obligation to consider how groundwater management affects public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to surface waters is also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses. (Environmental Law Foundation v. State Water Resources Control Board (2018), 26 Cal. App. 5th 844; National Audubon Society v. Superior Court (1983), 33 Cal. 3d 419.) The GSA has "an affirmative duty to take the public trust into account in the planning and allocation of water resources, and to protect public trust uses whenever feasible." (National Audubon Society, supra, 33 Cal. 3d at 446.) Accordingly, groundwater plans should consider potential impacts to and appropriate protections for ISW and their tributaries, and ISW that support fisheries, including the level of groundwater contribution to those waters.

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Attachment B

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