KERN NON-DISTRICTED LAND AUTHORITY

(FORMERLY KERN GROUNDWATER AUTHORITY)

3200 Rio Mirada Drive, Bakersfield, CA 93308
Meeting of the Board of Directors
April 27, 2026, 2:00 p.m.

To virtually attend the meeting and to be able to view any presentations or additional materials provided at the meeting, please join online using the link and information below:
https://us02web.zoom.us/j/87916828311?pwd=MXovFd9w4IFdX8AnOTJBUbbKBagIaC.1
Telephone Dial-in: (669) 900-6833
Meeting ID: 879 1682 8311
Password: 795650

KERN NON-DISTRICTED LAND AUTHORITY BOARD OF DIRECTORS AGENDA

This meeting is held in accordance with the Brown Act pursuant to Section 54956 of the California Government Code and the Kern Non-Districted Land Authority Joint Powers Agreement.

1. **Roll Call- Quorum Determination.**
   In the absence of a quorum, the Board will handle only those items not needing a quorum.

2. **Flag Salute**

3. **Public Input**
   This portion of the meeting is set aside to provide the public with an opportunity to bring to the attention of the Board matters of which the Board may not be aware and which are not on the current agenda. No action can be taken on any matter raised during this portion of the meeting; however, a Board member may request that the matter be placed on any future agenda for further review and possible action. Members of the public may directly address the Board of Directors on any item of interest within the Board's subject matter jurisdiction, before or during the Board's consideration of the item. The President may limit the time allowed for comment

4. **Approval of Minutes**
   a. *March 23, 2026

5. **Financial Report**
   a. *Financial Reports and Accounts Payables

6. **Administration**
   a. Executive Director Report
   b. Demand Management Update
   c. May/ June Meeting dates

7. **DWR Grant Administration**
   a. Report on Grant Administration (Jason)

8. **County of Kern Participation**
   a. Kern County Participation Ad Hoc Committee Report (Royce)

9. **Legal (Valerie)**
   a. Statewide Update

10. **New Business**

11. **Correspondence**
   a. Kern Tulare- EWMA Comment letter to DWR

12. **Closed Session**
   a. Technical Assistance Application Correspondence
   b. Demand Management Ad Hoc

13. **Adjournment**

A person with a qualifying disability under the Americans with Disabilities Act of 1990 may request the Authority provide disability-related modification or accommodation in order to participate in any public meeting of the Authority. Such assistance includes appropriate alternative formats for the agendas and agenda packets. Requests should be made in person, by telephone, facsimile and/or written correspondence to the Authority office, at least 48 hours before a public Authority meeting. Written materials related to an item on this agenda to be considered in open session that are public documents and that are distributed to board members after the posting of the agenda, will be made available for public inspection when they are so distributed at the location of the KNDLA meeting during normal business hours. Documents that are public documents provided by others during a meeting will be available at the same location during business hours after the meeting.

JPA Regular Board Meeting Minutes
Kern Non-Districted Land Authority (KNDLA)
Monday, March 23, 2026, at 2:00 p.m.

JPA DISTRICT REPRESENTATIVES AND ALTERNATES PRESENT

Derek Yurosek, Arvin-Edison
Amrit Mangat, Buena Vista
Spencer Birch, Cawelo
Wes Shyrock, KCWA ID4
Kevin Antongiovanni, Kern Delta
Andrew Hart, Kern Tulare
Eric McDaris, Kern Water Bank
Kevin Andrew, North Kern
Royce Fast, Pioneer
Barry Watts, RRBWSD
Dan Waterhouse, Semitropic
Bret Sill, Shafter-Wasco/7th Standard
Brandon Morris, Southern San Joaquin
Gary Morris, West Kern
Colby Fry, Wheeler Ridge
Debbie Wise, KNDLA
Devon Yurosek, KNDLA

JPA DISTRICT REPRESENTATIVES AND ALTERNATES BY TELECONFERENCE

Brian Grant, Olcese
Chad Hathaway, Eastside
Donna Semar, KCWA ID4

OTHERS PRESENT/ PARTICIPATING

Rachelle Echeverria, RRBWSD
Valerie Kincaid, Paris Kincaid Wasiewski
Jenny Holtermann, KNDLA
Randy Bloemhof
Austin Snedden
Michelle Anderson
Chisholm Twisselman
Dave Hampton
Taylor Blakslee

OTHERS VIRTUAL

Alanna Goodell
Dan Raytis
Dave Halopoff
David Cameron
Greg Hammett
Jeevan Muhar
Joe Butkiewicz
Kate Zenger
Richard Iger
Sheridan Nicholas
Stacie Ann Silva
Steve Torigiani
Tim Ashlock
Trent Taylor

1. **Roll Call**
   Chairman Watts called the meeting to order at 2:00 p.m. after confirming the presence of a quorum, as required by the JPA Agreement.

2. **Flag Salute**
   Completed.

3. **Public Input**
   None.

4. **Approval of Minutes**
   a. A motion was made by Director Derek Yurosek and seconded by Director McDaris to approve the minutes of February 23, 2026, regular board meeting. The motion carried.

5. **Financial Report**
   a. **Accounts Payable**
      Ms. Holtermann reviewed the deposits and monthly bills. A motion was made by Director Andrews and seconded by Director Hart to approve and authorize payment of disbursements as presented. Motion was carried unanimously.
   b. **Subbasin Cost Share Agreement**
      Ms. Holtermann reviewed the cost share agreement for the Kern Subbasin costs. KNDLA will be responsible for their portion of the costs. A motion was made by Director Hart and seconded by Director Fast. Motion was carried.

6. **Administration**
   a. **Executive Director Report.**
      Ms. Holtermann provided a report on the administration and technical work completed during the month. Holtermann also shared on the Kern subbasin SGMA meeting updates.
   b. **Demand Management Update**
      Ms. Holtermann provided an update on the meetings held with Provost and Pritchard and the ad hoc committee to review options for a demand management proposal.

7. **DWR Grant Administration**
   a. **Report on DWR Grant Administration**
      Mr. Gianquinto updated the board on the close out of the grant in progress.

8. **County of Kern Participation**
   a. **Kern County Participation Ad hoc Committee Report**
      No report was provided.

9. **Legal**
   a. **Statewide Update**
      Ms. Kincaid reported on State Water Board updates as well as the finalized Annual reports for the subbasin at DWR. Kincaid also provided a legislative update on potential bills addressing water, groundwater and flood water flow.

10. **New Business**
    None.

11. **Correspondence**
    None.

12. **Adjournment**
    A motion to adjourn was made by Director Hart and seconded by Director McDaris The motion carried unanimously, and the meeting was adjourned at 2:40 p.m.

Respectfully submitted,

Jenny Holtermann

ANDREA R. HILL, CPA
An Accountancy Corporation

April 22, 2026

TO: Kern Non-Districted Land Authority

FROM: Andrea R. Hill CPA, AAC

SUBJECT: February 2026 Accountant's Report

DISCUSSION

Exhibit A is the Authority's unaudited financial statements on February 28, 2026. They include a Statement of Net Position as of February 28, 2026, and a Statement of Revenue and Expenses for the one month and two months ended February 28, 2026. We believe both statements fairly present the financial position and results of the Authority's activities for the general JPA membership and each specific Special Activity Agreements at this time.

Exhibit B is the Accountant's Report for the Authority's financial activities from February 1, 2026, through February 28, 2026. There were $567.27 deposits during the month. Disbursements totaling $146,601.62 were issued during the month. The cash balance on February 28, 2026, was $40,833.98. There were no subsequent deposits as shown on **Exhibit C**.

The Accounts Receivable balance on February 28, 2026, was $349,717.72, which is from the retention of SGMA grant income as shown on **Exhibit D**.

Exhibit E is the details of Accounts Payable and Credit Card Payables for the month of February 2026, reflecting total payables on February 28, 2026, of $392,165.72. Invoices totaling $26,011.79 were submitted for payment approval at the March 23, 2026, meeting.

Kern Non-Districted Land Authority
Exhibit A - Statement of Net Position
As of February 28, 2026

	Feb 28, 26	
ASSETS		
Current Assets		
Checking/Savings		
Valley Strong Money Market		182,701.51
Valley Strong Savings		5.00
Valley Strong Checking		(141,872.53)
Total Checking/Savings		40,833.98
Accounts Receivable		
Accounts Receivable		349,717.72
Total Accounts Receivable		349,717.72
Total Current Assets		390,551.70
TOTAL ASSETS		**390,551.70**
LIABILITIES & EQUITY		
Liabilities		
Current Liabilities		
Accounts Payable		
Accounts Payable		392,074.55
Total Accounts Payable		392,074.55
Credit Cards		
Valley Strong Visa		91.17
Total Credit Cards		91.17
Total Current Liabilities		392,165.72
Total Liabilities		392,165.72
Equity		
Net Assets		
GSP - SAA#4	60,124.65	
ITRC - SAA#1	(13,626.47)	
KGA - General	(10,781.21)	
KRGSA-RMC (Ph2)	24.69	
KRGSA-Todd GW	20.00	
Total Net Assets		35,761.66
Net Income		(37,375.68)
Total Equity		(1,614.02)
TOTAL LIABILITIES & EQUITY		**390,551.70**

No Assurance is Provided. All Required Discolsures Have Been Omitted.

Kern Non-Districted Land Authority
Exhibit A - Statement of Revenue & Expenses
February 2026

	Feb 26	Jan - Feb 26
Ordinary Income/Expense		
Income		
Grant - State	126,929.35	492,764.50
Investment Income	567.27	872.75
Total Income	127,496.62	493,637.25
Expense		
Administration		
Accounting	2,104.95	2,104.95
Auditor	8,250.00	8,250.00
Executive Director	3,689.85	6,891.00
Fees	3.97	3.97
General Administration Support	478.02	478.02
General Attorney Support	17,702.50	17,702.50
Grant Administration	2,125.20	9,901.40
Interest Expense	1.03	1.03
Website Hosting & Maintenance	288.00	288.00
Total Administration	34,643.52	45,620.87
Demand Management	861.90	861.90
Office Expense	240.14	317.28
Technical		
General Technical Support	1,881.00	5,827.19
GIS	3,317.80	3,317.80
Grant Outside Services	473,593.00	473,593.00
Land IQ Irrigated	50.25	50.25
Land IQ Nonirrigated	122.41	122.41
Water Quality/Level Sampling	1,302.23	1,302.23
Technical - Other	(347,883.25)	0.00
Total Technical	132,383.44	484,212.88
Professional - Accounting	(1,104.95)	0.00
Professional - Auditor	(8,250.00)	0.00
Professional - Legal	(8,723.50)	0.00
Total Expense	150,050.55	531,012.93
Net Ordinary Income	(22,553.93)	(37,375.68)
Net Income	**(22,553.93)**	**(37,375.68)**

No Assurance is Provided. All Required Disclosures Have Been Omitted.

Kern Non-Districted Land Authority
Exhibit B - Bank Activity
As of February 28, 2026

Type	Date	Num	Name	Debit	Credit	Balance
Valley Strong Money Market						182,134.24
Deposit	02/28/2026			567.27		182,701.51
Total Valley Strong Money Market				567.27	0.00	182,701.51
Valley Strong Savings						5.00
Total Valley Strong Savings						5.00
Valley Strong Checking						4,729.09
Check	02/18/2026	3298	Valley Strong Credit Union		77.14	4,651.95
Bill Pmt -Check	02/18/2026	3299	Andrea R. Hill CPA AAC		1,104.95	3,547.00
Bill Pmt -Check	02/18/2026	3300	Barbich Hooper King Dill Hoffman LLP		8,250.00	(4,703.00)
Bill Pmt -Check	02/18/2026	3301	Holtermann Consulting Corp		3,201.15	(7,904.15)
Bill Pmt -Check	02/18/2026	3302	Paris Kincaid Wasiewski LLP		8,723.50	(16,627.65)
Bill Pmt -Check	02/18/2026	3303	Rosedale-Rio Bravo Water Storage Dis		150.00	(16,777.65)
Bill Pmt -Check	02/18/2026	3304	Land IQ LLC		79,262.50	(96,040.15)
Bill Pmt -Check	02/18/2026	3305	Todd Groundwater		45,832.38	(141,872.53)
Total Valley Strong Checking				0.00	146,601.62	(141,872.53)
TOTAL				**567.27**	**146,601.62**	**40,833.98**

Kern Non-Districted Land Authority
Exhibit B - Deposit Detail
February 2026

Type	Date	Name	Memo	Amount
Deposit	**02/28/2026**		**Deposit**	**567.27**
			February deposit dividend	(567.27)
TOTAL				(567.27)

Kern Non-Districted Land Authority
Exhibit B - Check Detail
February 2026

Type	Num	Date	Name	Paid Amount	Original Amount
Check	**3298**	**02/18/2026**	**Valley Strong Credit Union**		**(77.14)**
				(77.14)	77.14
TOTAL				(77.14)	77.14
Bill Pmt -Check	**3299**	**02/18/2026**	**Andrea R. Hill CPA AAC**		**(1,104.95)**
Bill	36143	01/21/2026		(1,000.00)	1,000.00
Bill	36215	01/31/2026		(104.95)	104.95
TOTAL				(1,104.95)	1,104.95
Bill Pmt -Check	**3300**	**02/18/2026**	**Barbich Hooper King Dill Hoffman LLP**		**(8,250.00)**
Bill	161288	01/31/2026		(8,250.00)	8,250.00
TOTAL				(8,250.00)	8,250.00
Bill Pmt -Check	**3301**	**02/18/2026**	**Holtermann Consulting Corp**		**(3,201.15)**
Bill	Jan2026	01/31/2026		(3,201.15)	3,201.15
TOTAL				(3,201.15)	3,201.15
Bill Pmt -Check	**3302**	**02/18/2026**	**Paris Kincaid Wasiewski LLP**		**(8,723.50)**
Bill	3102	01/31/2026		(8,723.50)	8,723.50
TOTAL				(8,723.50)	8,723.50
Bill Pmt -Check	**3303**	**02/18/2026**	**Rosedale-Rio Bravo Water Storage Dis**		**(150.00)**
Bill	2439	02/05/2026		(150.00)	150.00
TOTAL				(150.00)	150.00
Bill Pmt -Check	**3304**	**02/18/2026**	**Land IQ LLC**		**(79,262.50)**
Bill	6929	01/27/2026		(79,262.50)	79,262.50
TOTAL				(79,262.50)	79,262.50
Bill Pmt -Check	**3305**	**02/18/2026**	**Todd Groundwater**		**(45,832.38)**
Bill	83501-425	01/27/2026		(24,255.75)	24,255.75
Bill	83501-525	01/27/2026		(21,576.63)	41,707.50
TOTAL				(45,832.38)	65,963.25

Kern Non-Districted Land Authority
Exhibit C - Subsequent Deposits
March 1-31, 2026

Type	Num	Date	Name	Amount

No Subsequent Deposits to Report

Kern Non-Districted Land Authority
Exhibit D - Accounts Receivable Detail
As of February 28, 2026

Type	Date	Num	Name	Open Balance
State of California - DWR (SGMA Grant)				
Invoice	01/27/2026	13	State of California - DWR (SGMA Grant)	222,788.37
Invoice	02/23/2026	14	State of California - DWR (SGMA Grant)	126,929.35
Total State of California - DWR (SGMA Grant)				349,717.72
TOTAL				**349,717.72**

Exhibit E

Kern Non-Districted Land Authority

Accountant's Report - Accounts Payable detail as of February 28, 2026
and subsequent payables through 03/22/2026

Vendor	Description	Invoice #	Invoice Date	Invoice Amount	
Andrea R. Hill, CPA AAC	January accounting for February meeting	36273	2/24/2026	$ 1,000.00	
Barbich Hooper King Dill Hoffman LLP	Void 2/18/26 check for NSF & replace	161286	1/31/2026	$ (8,250.00)	
Barbich Hooper King Dill Hoffman LLP	replace of NSF check dated 2/18/26	161286	1/31/2026	$ 8,250.00	
Holterman Consulting Corp	February executive director services	Feb2026	2/28/2026	$ 3,689.85	
Land IQ LLC	February evapotranspiration evaluation	7658	2/18/2026	$ 176.63	
Land IQ LLC	March evapotranspiration evaluation	7685	3/1/2026	$ 3,946.19	March
Paris Kincaid Wasiewski LLP	February legal services	3128	2/28/2026	$ 8,979.00	
Provost & Pritchard Consulting	January management services	127986	2/23/2026	$ 3,695.63	
Provost & Pritchard Consulting	February groundwater allocation study	128404	2/28/2026	$ 861.90	
Provost & Pritchard Consulting	February management services	129045	2/28/2026	$ 3,571.42	
Valley Strong Credit Union	February credit card statement	13-3000	2/28/2026	$ 91.17	
	TOTAL PAYABLES REQUESTED AT 3/23/26 MEETING			$ 26,011.79	

INVOICES ON HOLD:

SGMA Planning Grant (Pending Grant Submittal/Proceeds):

Provost & Pritchard	SGMA Implementation Grant	125228	10/31/2025	5,594.90
Provost & Pritchard	SGMA Implementation Grant	125978	11/30/2025	3,852.70
Provost & Pritchard	SGMA Implementation Grant	127058	12/31/2025	2,253.00
Provost & Pritchard	SGMA Implementation Grant	127618	1/31/2026	7,776.20
Provost & Pritchard	SGMA Implementation Grant	128223	2/28/2026	12,606.20
				32,083.00
Todd Groundwater	SGMA Implementation Grant	83501-525	1/27/2026	20,130.87
Todd Groundwater	SGMA Implementation Grant	83501-625	1/27/2026	10,168.75
Todd Groundwater	SGMA Implementation Grant	83501-725	1/27/2026	10,831.25
Todd Groundwater	SGMA Implementation Grant	83501-825	1/27/2026	39,338.75
Todd Groundwater	SGMA Implementation Grant	83501-925	1/27/2026	70,316.25
Todd Groundwater	SGMA Implementation Grant	83501-1025	1/27/2026	72,002.50
Todd Groundwater	SGMA Implementation Grant	83501-1125	2/23/2026	48,437.50
Todd Groundwater	SGMA Implementation Grant	83501-1225	2/23/2026	30,481.25
Todd Groundwater	SGMA Implementation Grant	83501-126	2/23/2026	36,310.00
				338,017.12

PAYABLES/INVOICES ON HOLD pending Grant Proceeds	$	370,100.12
TOTAL PAYABLES Outstanding at 3/22/26	$	396,111.91
LESS MARCH PAYABLES SUBMITTED FOR PAYMENT		(3,946.19)
TOTAL PAYABLES Outstanding at 02/28/26	$	392,165.72

ANDREA R. HILL, CPA
An Accountancy Corporation

April 22, 2026

TO: Kern Non-Districted Land Authority

FROM: Andrea R. Hill CPA, AAC

SUBJECT: March 2026 Accountant's Report

DISCUSSION

Exhibit A is the Authority's unaudited financial statements on March 31, 2026. They include a Statement of Net Position as of March 31, 2026, and a Statement of Revenue and Expenses for the one month and three months ended March 31, 2026. We believe both statements fairly present the financial position and results of the Authority's activities for the general JPA membership and each specific Special Activity Agreements at this time.

Exhibit B is the Accountant's Report for the Authority's financial activities from March 1, 2026, through March 31, 2026. There were $170,985.45 deposits during the month. Disbursements totaling $34,261.79 were issued during the month. The cash balance on March 31, 2026, was $177,557.64. There were $36,080 of received payments during the month of March that are included in the subsequent deposits of $90,200, as well as an additional $72,160 of April received payments as shown on **Exhibit C**.

The Accounts Receivable balance on March 31, 2026, was $512,077.72, which is from the retention of SGMA grant income as shown on **Exhibit D**.

Exhibit E is the details of Accounts Payable and Credit Card Payables for the month of March 2026, reflecting total payables on March 31, 2026, of $403,984.32. Currently, invoices totaling $37,952.69 are submitted for payment approval.

Kern Non-Districted Land Authority
Exhibit A - Statement of Net Position
As of March 31, 2026

	Mar 31, 26	
ASSETS		
Current Assets		
Checking/Savings		
Valley Strong Money Market		165,436.96
Valley Strong Savings		5.00
Valley Strong Checking		12,115.68
Total Checking/Savings		177,557.64
Accounts Receivable		
Accounts Receivable		512,077.72
Total Accounts Receivable		512,077.72
Other Current Assets		
Undeposited Funds		36,080.00
Total Other Current Assets		36,080.00
Total Current Assets		725,715.36
TOTAL ASSETS		**725,715.36**
LIABILITIES & EQUITY		
Liabilities		
Current Liabilities		
Accounts Payable		
Accounts Payable		403,892.92
Total Accounts Payable		403,892.92
Credit Cards		
Valley Strong Visa		91.40
Total Credit Cards		91.40
Total Current Liabilities		403,984.32
Total Liabilities		403,984.32
Equity		
Net Assets		
GSP - SAA#4	60,124.65	
ITRC - SAA#1	(13,626.47)	
KGA - General	(10,781.21)	
KRGSA-RMC (Ph2)	24.69	
KRGSA-Todd GW	20.00	
Total Net Assets		35,761.66
Net Income		285,969.38
Total Equity		321,731.04
TOTAL LIABILITIES & EQUITY		**725,715.36**

No Assurance is Provided. All Required Discolsures Have Been Omitted.

Kern Non-Districted Land Authority
Exhibit A - Statement of Revenue & Expenses
March 2026

	Mar 26	Jan - Mar 26
Ordinary Income/Expense		
Income		
Grant - State	0.00	492,764.50
Investment Income	375.45	1,248.20
Member Contributions	360,800.00	360,800.00
Total Income	361,175.45	854,812.70
Expense		
Administration		
Accounting	465.00	2,569.95
Auditor	0.00	8,250.00
Executive Director	4,887.75	11,778.75
Fees	41.66	45.63
General Administration Support	710.15	1,188.17
General Attorney Support	7,081.00	24,783.50
Grant Administration	0.00	9,901.40
Interest Expense	1.26	2.29
Website Hosting & Maintenance	84.00	372.00
Total Administration	13,270.82	58,891.69
Demand Management	6,727.90	7,589.80
Office Expense	90.14	407.42
Technical		
General Technical Support	0.00	5,827.19
GIS	1,282.80	4,600.60
Grant Outside Services	0.00	473,593.00
Land IQ Irrigated	841.86	892.11
Land IQ Nonirrigated	3,062.67	3,185.08
Subbasin Corrdination	11,663.70	11,663.70
Water Quality/Level Sampling	890.50	2,192.73
Total Technical	17,741.53	501,954.41
Total Expense	37,830.39	568,843.32
Net Ordinary Income	323,345.06	285,969.38
Net Income	**323,345.06**	**285,969.38**

No Assurance is Provided. All Required Disclosures Have Been Omitted.

Kern Non-Districted Land Authority
Exhibit B - Bank Activity
As of March 31, 2026

Type	Date	Num	Name	Debit	Credit	Balance
Valley Strong Money Market						182,701.51
Transfer	03/05/2026				100,000.00	82,701.51
Transfer	03/09/2026				50,000.00	32,701.51
Deposit	03/20/2026			144,320.00		177,021.51
Transfer	03/23/2026				30,000.00	147,021.51
Deposit	03/23/2026			18,040.00		165,061.51
Deposit	03/31/2026			375.45		165,436.96
Total Valley Strong Money Market				162,735.45	180,000.00	165,436.96
Valley Strong Savings						5.00
Total Valley Strong Savings						5.00
Valley Strong Checking						(141,872.53)
Transfer	03/05/2026			100,000.00		(41,872.53)
General Journal	03/05/2026	2026-2		8,250.00		(33,622.53)
Transfer	03/09/2026			50,000.00		16,377.47
Bill Pmt -Check	03/23/2026	3306	Andrea R. Hill CPA AAC		1,000.00	15,377.47
Bill Pmt -Check	03/23/2026	3307	Jenny Holtermann	0.00		15,377.47
Bill Pmt -Check	03/23/2026	3308	Land IQ LLC		176.63	15,200.84
Bill Pmt -Check	03/23/2026	3309	Paris Kincaid Wasiewski LLP		8,979.00	6,221.84
Bill Pmt -Check	03/23/2026	3310	Provost & Pritchard Consulting Group		3,695.63	2,526.21
Bill Pmt -Check	03/23/2026	3311	Provost & Pritchard Consulting Group		861.90	1,664.31
Bill Pmt -Check	03/23/2026	3312	Land IQ LLC		3,946.19	(2,281.88)
Bill Pmt -Check	03/23/2026	3313	Provost & Pritchard Consulting Group		3,571.42	(5,853.30)
Check	03/23/2026	3314	Barbich Hooper King Dill Hoffman LLP		8,250.00	(14,103.30)
Check	03/23/2026	3315	Valley Strong Credit Union		91.17	(14,194.47)
Bill Pmt -Check	03/23/2026	3316	Holtermann Consulting Corp		3,689.85	(17,884.32)
Transfer	03/23/2026			30,000.00		12,115.68
Total Valley Strong Checking				188,250.00	34,261.79	12,115.68
TOTAL				**350,985.45**	**214,261.79**	**177,557.64**

Kern Non-Districted Land Authority
Exhibit B - Deposit Detail
March 2026

Type	Date	Name	Memo	Amount
General ...	**03/05/2026**		**To void ck 3300 issued 2/18/26 returned for NSF, reissue**	**8,250.00**
			To void ck 3300 issued 2/18/26 returned for NSF, reissue	(8,250.00)
TOTAL				(8,250.00)
Deposit	**03/20/2026**		**Deposit**	**144,320.00**
Payment	03/16/2026	Kern Wa...		(18,040.00)
Payment	03/16/2026	Shafter-...		(18,040.00)
Payment	03/16/2026	Shafter-...		(18,040.00)
Payment	03/16/2026	Semitrop...		(18,040.00)
Payment	03/16/2026	Southern...		(18,040.00)
Payment	03/18/2026	Kern Tul...		(18,040.00)
Payment	03/20/2026	Olcese ...		(18,040.00)
Payment	03/20/2026	Cawelo ...		(18,040.00)
TOTAL				(144,320.00)
Deposit	**03/23/2026**		**Deposit**	**18,040.00**
Payment	03/23/2026	North Ke...		(18,040.00)
TOTAL				(18,040.00)
Deposit	**03/31/2026**		**Deposit**	**375.45**
			March dividend income	(375.45)
TOTAL				(375.45)

Kern Non-Districted Land Authority
Exhibit B - Check Detail
March 2026

Type	Num	Date	Name	Paid Amount	Original Amount
Bill Pmt -Check	**3306**	**03/23/2026**	**Andrea R. Hill CPA AAC**		**(1,000.00)**
Bill	36273	02/24/2026		(1,000.00)	1,000.00
TOTAL				(1,000.00)	1,000.00
Bill Pmt -Check	**3307**	**03/23/2026**	**Jenny Holtermann**		**0.00**
TOTAL				0.00	0.00
Bill Pmt -Check	**3308**	**03/23/2026**	**Land IQ LLC**		**(176.63)**
Bill	7658	02/18/2026		(50.25)	50.25
				(122.41)	122.41
				(3.97)	3.97
TOTAL				(176.63)	176.63
Bill Pmt -Check	**3309**	**03/23/2026**	**Paris Kincaid Wasiewski LLP**		**(8,979.00)**
Bill	3128	02/28/2026		(8,979.00)	8,979.00
TOTAL				(8,979.00)	8,979.00
Bill Pmt -Check	**3310**	**03/23/2026**	**Provost & Pritchard Consulting Group**		**(3,695.63)**
Bill	127986	02/23/2026		(241.53)	241.53
				(1,524.00)	1,524.00
				(1,600.60)	1,600.60
				(168.00)	168.00
				(161.50)	161.50
TOTAL				(3,695.63)	3,695.63
Bill Pmt -Check	**3311**	**03/23/2026**	**Provost & Pritchard Consulting Group**		**(861.90)**
Bill	128404	02/28/2026		(861.90)	861.90
TOTAL				(861.90)	861.90
Bill Pmt -Check	**3312**	**03/23/2026**	**Land IQ LLC**		**(3,946.19)**
Bill	7685	03/01/2026		(841.86)	841.86
				(3,062.67)	3,062.67
				(41.66)	41.66
TOTAL				(3,946.19)	3,946.19
Bill Pmt -Check	**3313**	**03/23/2026**	**Provost & Pritchard Consulting Group**		**(3,571.42)**
Bill	129045	02/28/2026		(357.00)	357.00
				(236.49)	236.49
				(1,717.20)	1,717.20
				(120.00)	120.00
				(1,140.73)	1,140.73
TOTAL				(3,571.42)	3,571.42
Check	**3314**	**03/23/2026**	**Barbich Hooper King Dill Hoffman LLP**		**(8,250.00)**
				(8,250.00)	8,250.00

Kern Non-Districted Land Authority
Exhibit B - Check Detail
March 2026

Type	Num	Date	Name	Paid Amount	Original Amount
TOTAL				(8,250.00)	8,250.00
Check	**3315**	**03/23/2026**	**Valley Strong Credit Union**		**(91.17)**
				(91.17)	91.17
TOTAL				(91.17)	91.17
Bill Pmt -Check	**3316**	**03/23/2026**	**Holtermann Consulting Corp**		**(3,689.85)**
Bill	Feb2026	02/28/2026		(3,689.85)	3,689.85
TOTAL				(3,689.85)	3,689.85

Kern Non-Districted Land Authority
Exhibit C - Subsequent Deposits
April 1-22, 2026

Type	Num	Date	Name	Amount
Deposit		4/7/2026		**90,200.00**
Payment	59883	3/30/26	West Kern Water District	18,040.00
Payment	48677	3/30/26	Kern Delta Water District	18,040.00
Payment	134743	4/3/26	Kern Co Water Agency ID4	18,040.00
Payment	134818	4/3/26	Kern Co Water Agency Pioneer GSA	18,040.00
Payment	4995	4/6/26	Rosedale-Rio Bravo WSD	18,040.00

Payements Received - Not Yet Deposited

Payment	9920691770	4/13/2026	Westside District Water Authority	18,040.00
Payment	18404444	4/15/2026	Tejon-Castac Water District	18,040.00
Payment	52171	4/21/2026	Arvin-Edison Water Storage District	18,040.00
Payment	12066	4/21/2026	Buena Vista Water Storgage District	18,040.00
				72,160.00

Kern Non-Districted Land Authority
Exhibit D - Accounts Receivable Detail
As of March 31, 2026

Type	Date	Num	Name	Open Balance
Arvin-Edison Water Storage District				
Invoice	03/02/2026	KNDLA 26-1	Arvin-Edison Water Storage District	18,040.00
Total Arvin-Edison Water Storage District				18,040.00
Buena Vista Water Storage Dist				
Invoice	03/02/2026	KNDLA 26-2	Buena Vista Water Storage Dist	18,040.00
Total Buena Vista Water Storage Dist				18,040.00
Eastside Water Mgmt Area				
Invoice	03/02/2026	KNDLA 26-4	Eastside Water Mgmt Area	18,040.00
Total Eastside Water Mgmt Area				18,040.00
Kern Co Water Agency ID4				
Invoice	03/02/2026	KNDLA 26-5	Kern Co Water Agency ID4	18,040.00
Total Kern Co Water Agency ID4				18,040.00
Kern Co Water Agency Pioneer GSA				
Invoice	03/02/2026	KNDLA 26-6	Kern Co Water Agency Pioneer GSA	18,040.00
Total Kern Co Water Agency Pioneer GSA				18,040.00
Rosedale-Rio Bravo WSD				
Invoice	03/02/2026	KNDLA 26-12	Rosedale-Rio Bravo WSD	18,040.00
Total Rosedale-Rio Bravo WSD				18,040.00
State of California - DWR (SGMA Grant)				
Invoice	01/27/2026	13	State of California - DWR (SGMA Grant)	222,788.37
Invoice	02/23/2026	14	State of California - DWR (SGMA Grant)	126,929.35
Total State of California - DWR (SGMA Grant)				349,717.72
Tejon-Castac Water District				
Invoice	03/02/2026	KNDLA 26-17	Tejon-Castac Water District	18,040.00
Total Tejon-Castac Water District				18,040.00
Westside District Water Authority GSA				
Invoice	03/02/2026	KNDLA 26-19	Westside District Water Authority GSA	18,040.00
Total Westside District Water Authority GSA				18,040.00
Wheeler Ridge-Maricopa WSD				
Invoice	03/02/2026	KNDLA 26-20	Wheeler Ridge-Maricopa WSD	18,040.00
Total Wheeler Ridge-Maricopa WSD				18,040.00
TOTAL				**512,077.72**

Exhibit E

Kern Non-Districted Land Authority

Accountant's Report - Accounts Payable detail as of March 31, 2026 and subsequent payables through 04/22/2026

Vendor	Description	Invoice #	Invoice Date	Invoice Amount	
Andrea R. Hill, CPA AAC	Process check run for March meeting	36610	3/31/2026	$ 465.00	
Buena Vista Water Storage District	Funding request for SGMA CC	18	3/31/2026	$ 11,663.70	
Holterman Consulting Corp	March executive director services	Mar2026	3/31/2026	$ 4,887.75	
Land IQ LLC	April evapotranspiration evaluation	7761	4/1/2026	$ 4,068.49	April
Paris Kincaid Wasiewski LLP	March legal services	3153	3/31/2026	$ 7,081.00	
Provost & Pritchard Consulting	March management services	129820	3/31/2026	$ 2,967.45	
Provost & Pritchard Consulting	March groundwater allocation study	129624	3/31/2026	$ 6,727.90	
Valley Strong Credit Union	March credit card statement	13-3000	3/31/2026	$ 91.40	
	TOTAL PAYABLES REQUESTED AT THIS MEETING			$ 37,952.69	
INVOICES ON HOLD:					
SGMA Planning Grant (Pending Grant Submittal/Proceeds):					
Provost & Pritchard	SGMA Implementation Grant	125228	10/31/2025	5,594.90	
Provost & Pritchard	SGMA Implementation Grant	125978	11/30/2025	3,852.70	
Provost & Pritchard	SGMA Implementation Grant	127058	12/31/2025	2,253.00	
Provost & Pritchard	SGMA Implementation Grant	127618	1/31/2026	7,776.20	
Provost & Pritchard	SGMA Implementation Grant	128223	2/28/2026	12,606.20	
				32,083.00	
Todd Groundwater	SGMA Implementation Grant	83501-525	1/27/2026	20,130.87	
Todd Groundwater	SGMA Implementation Grant	83501-625	1/27/2026	10,168.75	
Todd Groundwater	SGMA Implementation Grant	83501-725	1/27/2026	10,831.25	
Todd Groundwater	SGMA Implementation Grant	83501-825	1/27/2026	39,338.75	
Todd Groundwater	SGMA Implementation Grant	83501-925	1/27/2026	70,316.25	
Todd Groundwater	SGMA Implementation Grant	83501-1025	1/27/2026	72,002.50	
Todd Groundwater	SGMA Implementation Grant	83501-1125	2/23/2026	48,437.50	
Todd Groundwater	SGMA Implementation Grant	83501-1225	2/23/2026	30,481.25	
Todd Groundwater	SGMA Implementation Grant	83501-126	2/23/2026	36,310.00	
				338,017.12	
	PAYABLES/INVOICES ON HOLD pending Grant Proceeds			$ 370,100.12	
	TOTAL PAYABLES Outstanding at 4/22/26			$ 408,052.81	
	LESS APRIL PAYABLES SUBMITTED FOR PAYMENT			(4,068.49)	
	TOTAL PAYABLES Outstanding at 03/31/26			$ 403,984.32	

KERN NON-DISTRICTED LAND AUTHORITY
1518 Milll Rock Way, Suite 100 Bakersfield, CA 93311
Phone: (661)595-5514
Email: jenny@kndla.org
Website: www.kndla.org

April, 2026

To: KNDLA Board of Directors

From: Jenny Holtermann

Re: Executive Director Report, April

Administration

- Coordination with P&P on GIS platform and mapping
- Coordination with P&P on well monitoring and collection of water level for spring timeline and deadline
- Coordination with P&P and EKI on data gaps still needing to be filled
    - One access agreement sent to landowner, awaiting response
    - Follow up on potential additional data gaps to fill
- Land IQ review, monthly review and analysis
- Meeting with Provost and Pritchard for Demand Management
    - Demand Management Ad Hoc Meeting
    - Follow up on progress
- Board Meeting Agenda and Minutes, prep and coordination
- Form 700 coordination
- Audit coordination and collection of materials
- Coordinate Financial statements, deposits and payables.

Kern Subbasin SGMA Weekly Friday Managers Meetings, Monday Policy Meetings

- Plan Updates
    - Public Comment Letter review
- Well mitigation program review, well inventory progress
- Outreach plan, Earth Day promotion and Annual Plan workshops
- Well Permitting process with Kern County, ongoing
- Updates and reviewing of proposals on SGMA management
- EWMA Water District formation process and demand management plan
- Annual Report submittal

KTWD
KERN-TULARE
WATER DISTRICT

BOARD OF DIRECTORS:
Kent H. Stephens, President
Andrew Pandol, Vice President/Treasurer
Curt Holmes, Secretary
Mike Jost, Director
Andrew Hart, Director

DISTRICT STAFF:
Skye B. Grass, General Manager
Morgan Mitchell, Superintendent
Vanessa Y. Escobedo, District Engineer

April 20, 2026

Submitted via DWR SGMA Portal

Paul Gosselin
Deputy Director of Sustainable Groundwater Management
California Department of Water Resources
715 P Street
Sacramento, CA 95814

Subject: Kern County Subbasin Amended GSP Comments – Eastside Water Management Area

Dear Mr. Gosselin,

The Kern-Tulare Water District Groundwater Sustainability Agency (KTWD GSA) appreciates the opportunity to provide comments on the 2025 Amended Kern Subbasin GSP (GSP). The Kern Subbasin GSAs worked collectively to prepare the GSP, a coordinated document that addresses the deficiencies identified in DWR's Inadequate Determination and the additional recommendations provided by the State Water Resources Control Board. KTWD GSA supports and has adopted the GSP and believes that DWR should and can issue an Adequate determination following its review, and we recommend that it also includes specific corrective requirements for Eastside Water Management Area (EWMA). KTWD GSA's goal in submitting these comments is to ensure the long-term success of the subbasin plan and continued effective implementation under DWR jurisdiction.

KTWD GSA strongly recommends DWR note the lack of progress made by EWMA—a groundwater-dependent, whiteland area covering 39,420 acres on the east side of the Kern Subbasin—and its insufficient projects and management actions. KTWD GSA has significant concerns regarding EWMA's management area and its ability and willingness to sustainably manage groundwater. KTWD GSA is geographically located immediately to the west of EWMA, and KTWD GSA's sustainability is contingent on this management area becoming sustainable. It is therefore critical that EWMA is not permitted to continue to extract groundwater in an unsustainable manner. The success of the subbasin will rely heavily upon whitelands being properly managed through demand reduction actions. To date, EWMA has not adopted management actions that will bring it into sustainability and EWMA has not made meaningful progress towards arresting overdraft in its area.

Background

EWMA is "a non-profit corporation governed by a seven-member Board of Directors that is working to become a public agency and serve as the GSA for land within its boundaries. Until EWMA can serve as its own GSA, it is treated as a separate management area within the Kern Non-Districted Lands Authority (KNDLA)." –*GSP Section 10. Management Areas*

"The EWMA was formed on May 7, 2018 and implements groundwater management through a Provision of Jurisdiction Agreements with the KNDLA GSA. Additional details are provided in the Kern Non-District Lands Authority Joint Powers Agreement governance document in Appendix C-2 [of the GSP], which formally defines EWMA's roles and responsibilities as a partner to the other Kern Subbasin GSAs." *–GSP Section 3.4 Legal Authority of the GSAs*

A description of EWMA can be found in *Kern GSP Section 5. Plan Area (p. 5-8, 5-9):*

- "Encompasses 39,420 acres primarily in the East Margin HCM Area with a few non-districted parcels on the eastern edge of the North Basin HCM Area."
- "Most lands are adjacent to Kern-Tulare Water District GSA, Cawelo Water District GSA and the Southern San Joaquin Municipal Utility District GSA."
- "Land uses include oil/industrial (81 percent), trees (16 percent), urban and roads (7 percent) and idle land (2 percent)."
- Within KNDLA "Non-districted lands and EWMA are treated as separate management areas with regard to water budgets and Projects and Management Action (P/MAs)."

Figure 1 and **Figure 2**, extracted from the GSP, show all GSAs in the Kern Subbasin, with EWMA highlighted, as well as all land use within KNDLA, including EWMA.

I. GROUNDWATER EXTRACTIONS WITHIN EWMA IMPACT KTWD GSA

A. Thousands of groundwater-dependent acres were recently developed on KTWD GSA's eastern border

Since 2014, 3,460 acres (2,564 acres in the Kern County Subbasin and 896 acres in the Tule Subbasin) of non-districted land has been developed into permanent plantings east of KTWD GSA. These grounds are solely reliant on groundwater, and extractions are from the Santa Margarita Formation and deeper confined aquifers. **Table 1** and **Figure 3** show the development of this acreage over three time periods: prior to 2014, between January 2014 to December 2019 and from January 2020 to present.

Table 1. Development of Non-Districted Lands to the East of KTWD GSA

Year Developed	Kern (acres)	Tule (acres)	Total (acres)
Pre-2014	2,110	4,641	6,752
Jan 2014 – Dec 2019	2,255	399	2,645
Jan 2020 – Present	309	497	806
Total	**4,674**	**5,537**	**10,203**

EWMA covers approximately 4,000 acres of the 4,674 acres east of KTWD GSA.

B. Lands in EWMA are overdrafting a confined aquifer shared with KTWD

EWMA and KTWD GSA are located within the East Margin HCM Area, where older, locally significant geologic units including the Santa Margarita Formation and Olcese Sands, are present. The Santa Margarita Formation is a primary aquifer for both KTWD GSA and EWMA. The Olcese Sands are accessed by wells on the eastern edge of KTWD GSA and within EWMA.

The Santa Margarita Formation is confined above and below by impervious silt and shale layers. As stated in the GSP, the Santa Margarita Formation is a highly permeable confined aquifer that acts as a source of freshwater in the northeast portion of the subbasin. The formation is recharged from rainfall and stream seepage where the formation outcrops from the Sierra east of KTWD GSA and EWMA.

The confined aquifers of the Santa Margarita Formation and the Olcese Sands are shallow to the east and deepen to the west as shown in cross-sections A and B of the GSP. **Figure 4** displays an additional east-west cross-section long County Line Road of KTWD GSA and EWMA, and includes both the Santa Margarita Formation and the Olcese Sands aquifers, as well as the static water level of each aquifer, the extent of freshwater, and any active wells (with total depth or perforated interval information for each). As shown in **Figure 4**, most of the wells within KTWD GSA and EWMA penetrate to the Santa Margarita Formation; wells near the eastern border of KTWD GSA and within EWMA extend to the Olcese Sands.

Figure 5 is a map of all active agricultural wells within KTWD GSA. The map references the deepest aquifer penetrated by each well, as determined by the cross-sections. The map also depicts developed land with agricultural wells within EWMA that rely on the Santa Margarita Formation and the Olcese Sands aquifers. The location and the deepest aquifer penetrated by wells within EWMA was gathered from a 2021 draft report entitled "Determination of Supply Well Production from Various Formations in the EWMA" written by Schmidt and Associates on behalf of EWMA. Although the figure displays the deepest aquifer penetrated, most wells pump from multiple aquifers. The pumping percentage of individual wells varies and ranges from 30% to 81% from the Santa Margarita and 15% to 72% from the Olcese Sands based on the findings of the draft report.

With 4,000 acres of EWMA planted into permanent crops east of KTWD GSA and solely reliant on groundwater, EWMA is heavily overdrafting the Santa Margarita Formation and the Olcese Sands aquifers and directly negatively impacting KTWD GSA's groundwater supplies.

C. Impacts to the Santa Margarita Formation

Groundwater elevations in the Santa Margarita Formation have been monitored since the 1960's and KTWD has been reporting water levels via CASGEM since 2012. **Figure 6** is a hydrograph of groundwater levels for the six wells with long standing periods of record that penetrate to the Santa Margarita Formation within KTWD GSA. As discussed in the GSP and shown in **Figure 6**, groundwater levels were falling prior to the formation of the Kern-Tulare Water District (District) and recovered for a period of time once the District began importing surface water.

The groundwater aquifers shared by KTWD GSA and EWMA are now however under significant stress, with the Santa Margarita Aquifer showing clear signs of overdraft. A key piece of evidence for this is the aquifer's inability to recover its water levels; even when KTWD GSA cut its own pumping by as much as 67% between 2014 and 2020, and despite back-to-back wet years in 2023-2024, groundwater elevations

failed to rebound meaningfully. The primary driver of this decline is increased agricultural plantings and pumping within EWMA during this time period. The recent drop in KTWD's groundwater levels directly correlates with a period of increased irrigated farming and a subsequent rise in groundwater pumping within EWMA.

This impact occurs because both KTWD GSA and landowners within EWMA draw water from the same, interconnected source. Because EWMA sits "upstream" of KTWD GSA relative to the natural groundwater flow, its pumping intercepts water that would otherwise replenish the aquifer beneath KTWD GSA. The scale of this pumping is substantial; EWMA, which relies entirely on groundwater, extracts more than **double** the amount of water as KTWD GSA during droughts and **over four times** as much during years when KTWD has access to more surface water. This continuous, high-volume pumping in the EWMA—which unlike KTWD GSA, has no surface water supplies—prevents the shared aquifer from recovering and is dewatering the formation.

II. THE GSP CONTAINS NO MANAGEMENT ACTIONS OR PROJECTS TO ACHIEVE SUSTAINABILITY IN EWMA

KTWD GSA and its landowners have made significant progress towards sustainability, and the SWRCB has separately determined that KTWD GSA qualifies for an exemption from fees and reporting within the Tule Subbasin because it adequately manages groundwater. Since 2015 KTWD GSA has increased surface water deliveries through $3M distribution system improvement projects, a comprehensive well registration and groundwater metering program, and implementation of an up to $175 per acre-foot groundwater extraction charge. These actions have significantly reduced groundwater pumping and increased surface water deliveries by 25% within KTWD GSA. Conversely, EWMA has implemented no projects or management actions to reduce overdraft within its area east of KTWD GSA.

A. EWMA has no meaningful projects or management actions

Within the *GSP Section 14. Projects and Management Actions Table 14-7. Eastside Water Management Area P/MA*, EWMA lists nine projects and management actions (P/MAs), not including the Kern Subbasin-wide P/MAs. Excerpted information from *GSP Table 14-7* is shown here as **Table 2**. Two of the projects focus on water supply augmentation including a Produced Water Supply Project and a Surface Runoff Capture Project with an expected completion date of 2035. The remaining seven P/MAs are mainly focused on studies, monitoring, and developing programs to trade water credits and do not have any expected benefits from a water supply augmentation standpoint. EWMA has not established any meaningful projects or implemented any management actions to reduce groundwater pumping**.** Groundwater conditions thus continue to decline and EWMA is not on a path to achieve sustainability.

Table 2. EWMA P/MAs excerpted information from GSP Table 14-7

P/MA Number	P/MA Name	Summary Description	Status	Timetable for Completion	Water Supply Augmentation (AFY)	Demand Reduction (AFY)
EWMA-1	Produced Water Supply Project	Development of oilfield produced water supplies to potentially reduce groundwater demand	Initiating Development	2035	900	0
EWMA-2	Surface Runoff Capture Project	Surface runoff capture and enhanced infiltration in impoundments	Planning	2035	3220	0
EWMA-3	Groundwater Quality Investigation	Investigation of groundwater quality by collection and analysis of water quality data supplemented by borehold geophysical data where available	Implemented	2025	0	0
EWMA-4	Local Native Yield Estimation Study	Improved estimation of local (EWMA) native yield by use of additional field-collected data and analysis	On-going	2025	0	0
EWMA-5	Aquifer-Specific Monitoring Wells Installation	Construction of aquifer-specific monitoring wells in locations with data gaps, to better understand hydraulic heads and gradients, particularly in confined bedrock units	Planning	2025	0	0
EWMA-6	Pressure Transducers Installation	Installation of pressure transducers in selected wells of the monitoring network, to collect high-resolution cost-effective data	Planning	2025	0	0
EWMA-7	Agricultural Demand Reduction	Maintain and improve 2024 Subbasin well inventory in the DMS platform with added data from field surveys, current beneficial use determinations, and coordination with Kern County EH and DWR to track new wells, etc.	Ongoing	2024-	0	0
EWMA-8	Groundwater Usage Fee Assessment	Maintain and improve existing Subbasin consumptive-use study (ITRC Metric/LandIQ) for accurate estimates of water use by parcel within GSAs.	Ongoing	2020-	0	0
EWMA-9	Transferrable Water Credit Program	Establish a system of transferrable water credits; including legal and administrative review: effects of CEQA and water law on join management of native yield	Initiating Development	2030	0	0

B. EWMA is Unreasonably Delaying Demand Reduction Actions

EWMA continues to delay demand reduction actions by citing the need for a basin-wide study that is already complete. EWMA's delay is plainly stated in the 2025 Kern County Subbasin Annual Report:

> **"Reduction in Agricultural Water Use:** Reduction of irrigated acreage, or modification irrigation techniques of crop types to reduce water usage is *still being planned*. Prior to implementing demand reduction, the sustainable yield needs to be established which is expected to be completed by the end 2025 following the completion of the basin hydrologic study. One important data gap missing in the Kern C2VSim model are the deeper aquifers that many EWMA members rely on for their water supply. These aquifers include the locally productive Santa Margarita, Olcese, and Vedder/Pyramid Hills units. Staff has communicated this model deficiency with Todd Groundwater and were informed that the model would be updated during the basin hydrologic study expected to be completed in 2026." [Emphasis added.]
>
> **"Groundwater Fees:** *No progress was made* on a determination to assess fees for groundwater use to encourage reduced pumping or curtailment until the sustainable yield is established following the completion of the basin-wide hydrologic study." [Emphasis added.]
>
> **"Water Transfer Credit System:** Efforts continue to establish a system of transferrable water credits in the EWMA. The EWMA previously developed an internal sustainable yield policy and, during WY 2023, started formalizing a system via draft Rules and Regulations. The EWMA expects time implement a water transfer credit system at the conclusion of the basin hydrogeologic study in 2026."
>
> **"Summary of Other GSP-related Special Studies or Activities:** The EWMA Board and members directed staff to initiate formation of a water district for SGMA purposes, and in WY 2023 a surveyor was hired to prepare the mapping and legal descriptions required for the notice of petition. District formation efforts are ongoing and expected to conclude in 2026. Additionally, EWMA is actively participating in the Subbasin-wide activities in Section 9, Progress on Subbasin-wide coordination on GSP implementation."

While EWMA continues to delay demand management implementation pending unknown further study, damage to the Subbasin and KTWD GSA continues by their overdraft.

III. EWMA'S PROPOSED DISTRICT FORMATION WITHOUT BINDING DEMAND REDUCTION REQUIREMENTS POSES A THREAT TO THE SUBBASIN

EWMA has stated it will seek to form a water district. Formation of the proposed district, and the creation of its own GSA without strict groundwater pumping restrictions, would only put the Kern Subbasin and KTWD GSA at further risk. The formation of the proposed district could result in increased growth in developed land use and groundwater pumping in the proposed service area as they would not be subject to any management actions.

KTWD GSA recommends that DWR consider specific corrective actions for EWMA including:

1. A requirement to implement an immediate moratorium on the drilling of new agricultural wells.
2. A requirement that EWMA implement a mandatory well registration and automated groundwater metering program (telemetry) for all active agricultural wells within 12 months, ensuring extraction data is accurate and transparent.
3. A requirement that EWMA establish and implement a groundwater extraction fee structure within 12 months to disincentivize over-pumping and fund mitigation efforts.
4. A requirement to establish a formal mitigation program to address and compensate for the continued dewatering of the Santa Margarita and Olcese confined aquifers.
5. A requirement that EWMA submit quarterly progress reports directly to DWR detailing its progress on implementing demand reduction actions, removing its ability to hide behind delayed basin-wide studies.
6. A requirement that management actions be adopted within 6 months that reduce groundwater extractions to native yield on a straight-line path by 2040.
7. A requirement that a subsidence management plan be adopted that includes cease pumping orders when quantitative thresholds are triggered.

KTWD GSA supports the GSP and believes that an Adequate determination from DWR is appropriate and including the above corrective requirements will help ensure the long-term success of the subbasin plan. We appreciate the effort of DWR to review the GSP and are thankful for the opportunity to provide comments regarding this specific management area within the subbasin. If you have any questions or require additional information, please contact me at vanessa@kern-tulare.com or 661-327-3132.

Sincerely,

Vanessa Yap Escobedo
District Engineer, Kern-Tulare Water District
Point of Contact, Kern-Tulare Water District GSA

cc: Jenny Holtermann, KNDLA
Taylor Blakslee, EWMA
Blair Knox, Kern County LAFCo

FIGURES

Figure 1. GSA Coverage of the Kern Subbasin displaying EWMA *(from GSP Figure 5-3)*

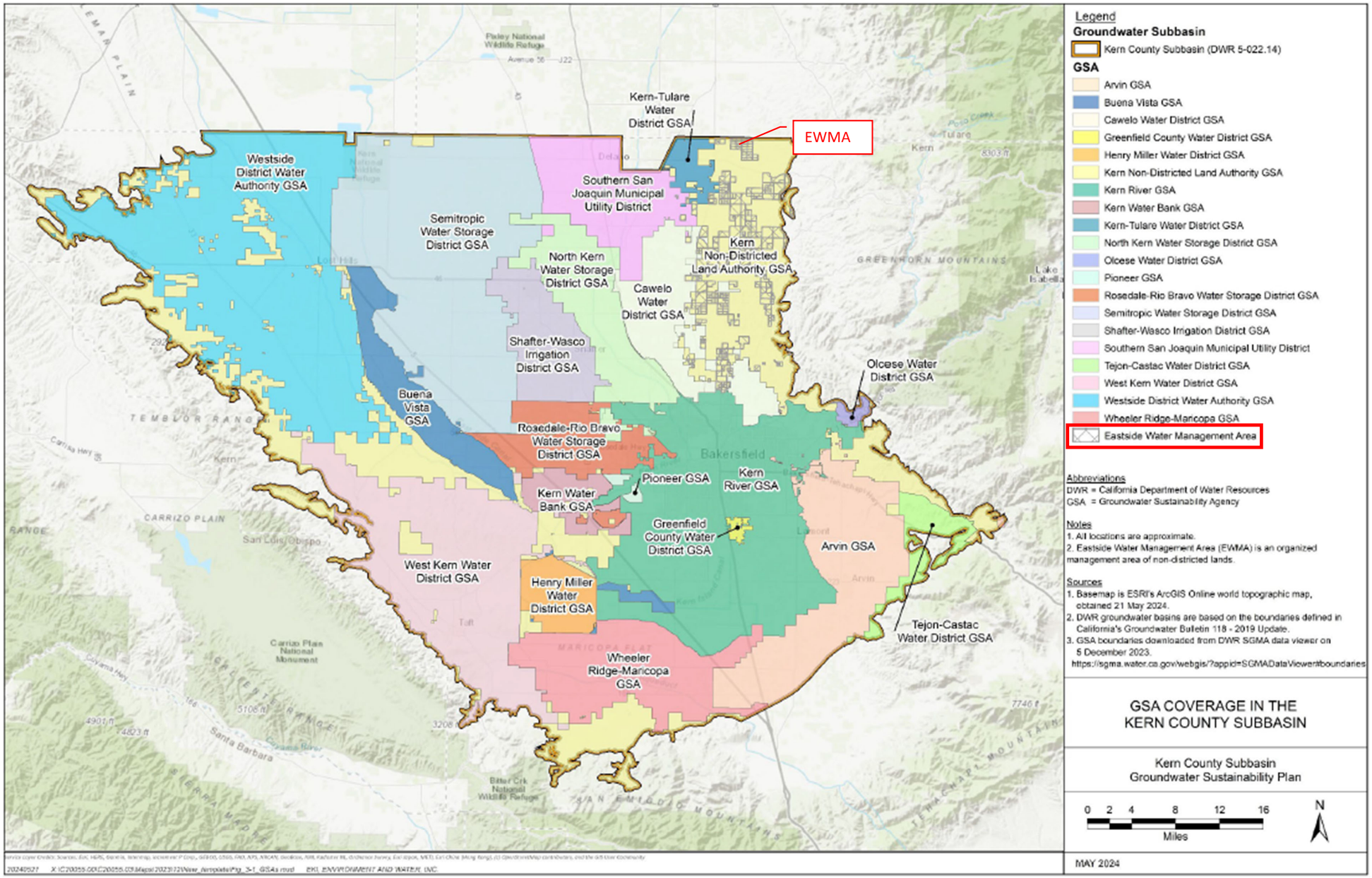

Figure 5-3. GSA Coverage of the Kern Subbasin

Figure 2. Land Use in Kern Non-Districted Land Authority *(from GSP Figure 5-5)*

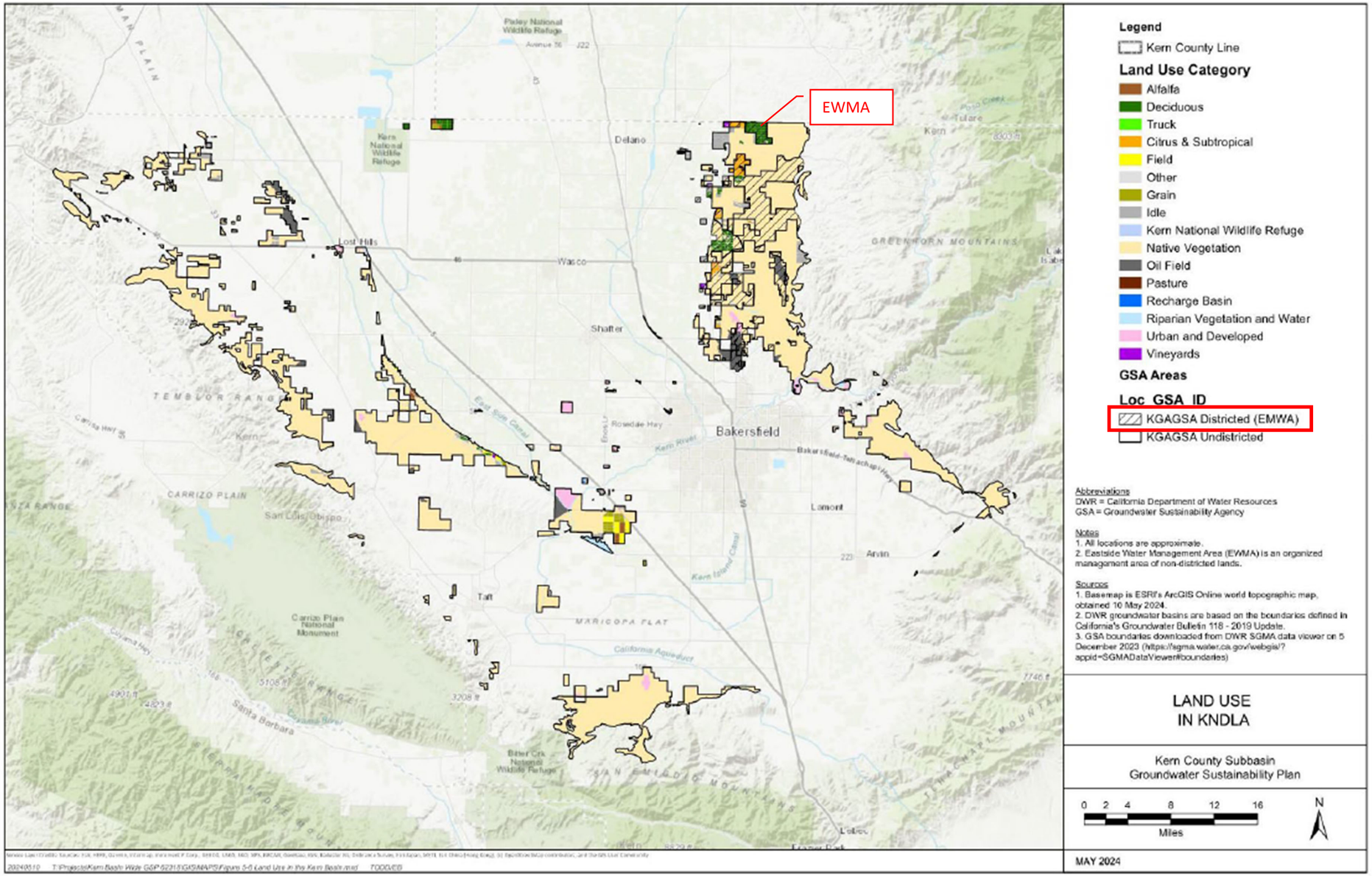

Figure 5-5. Land Use in Kern Non-Districted Land Authority

Figure 3. Whitelands East of KTWD GSA

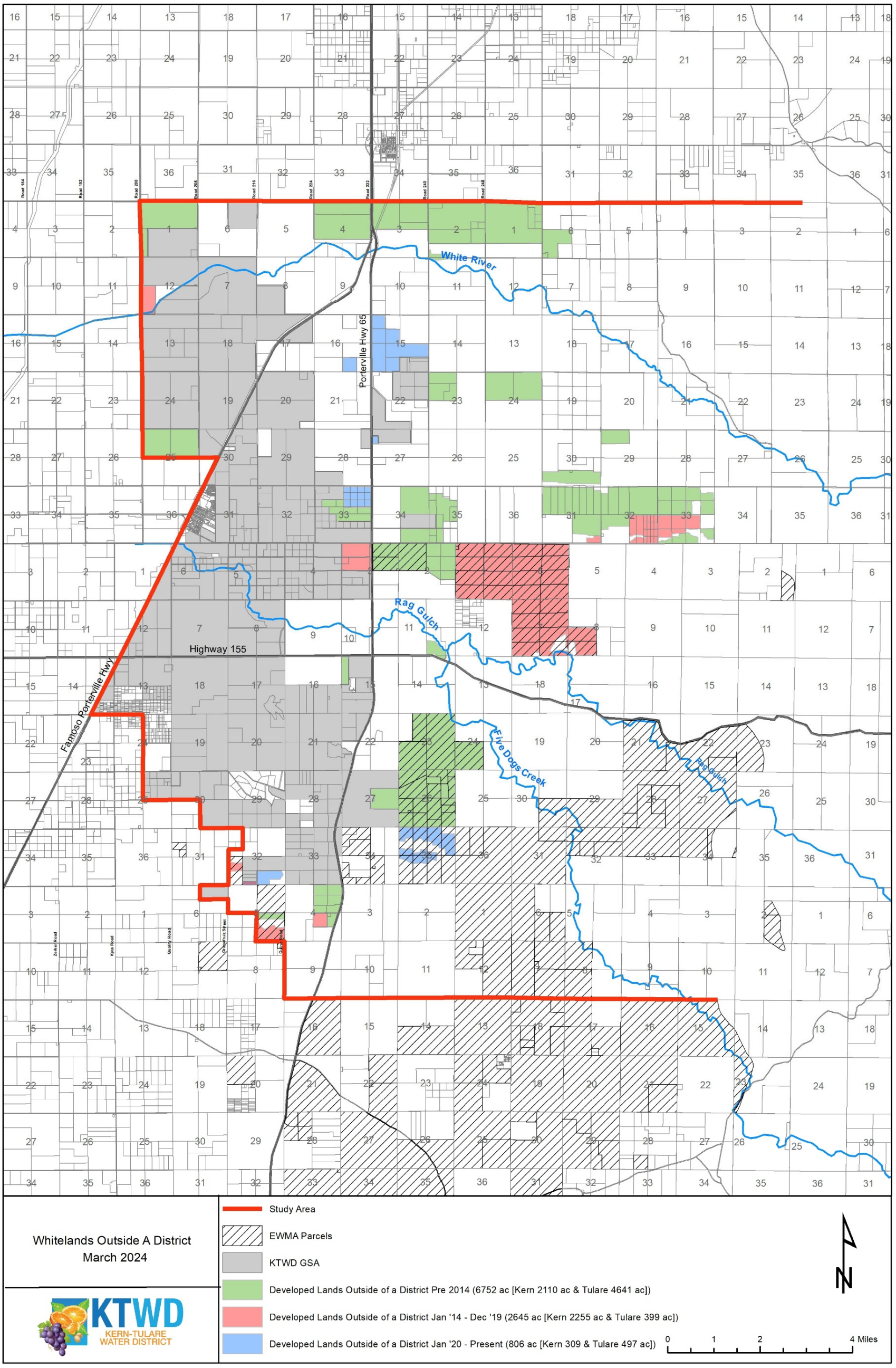

Figure 4. Cross Section along County Line Road

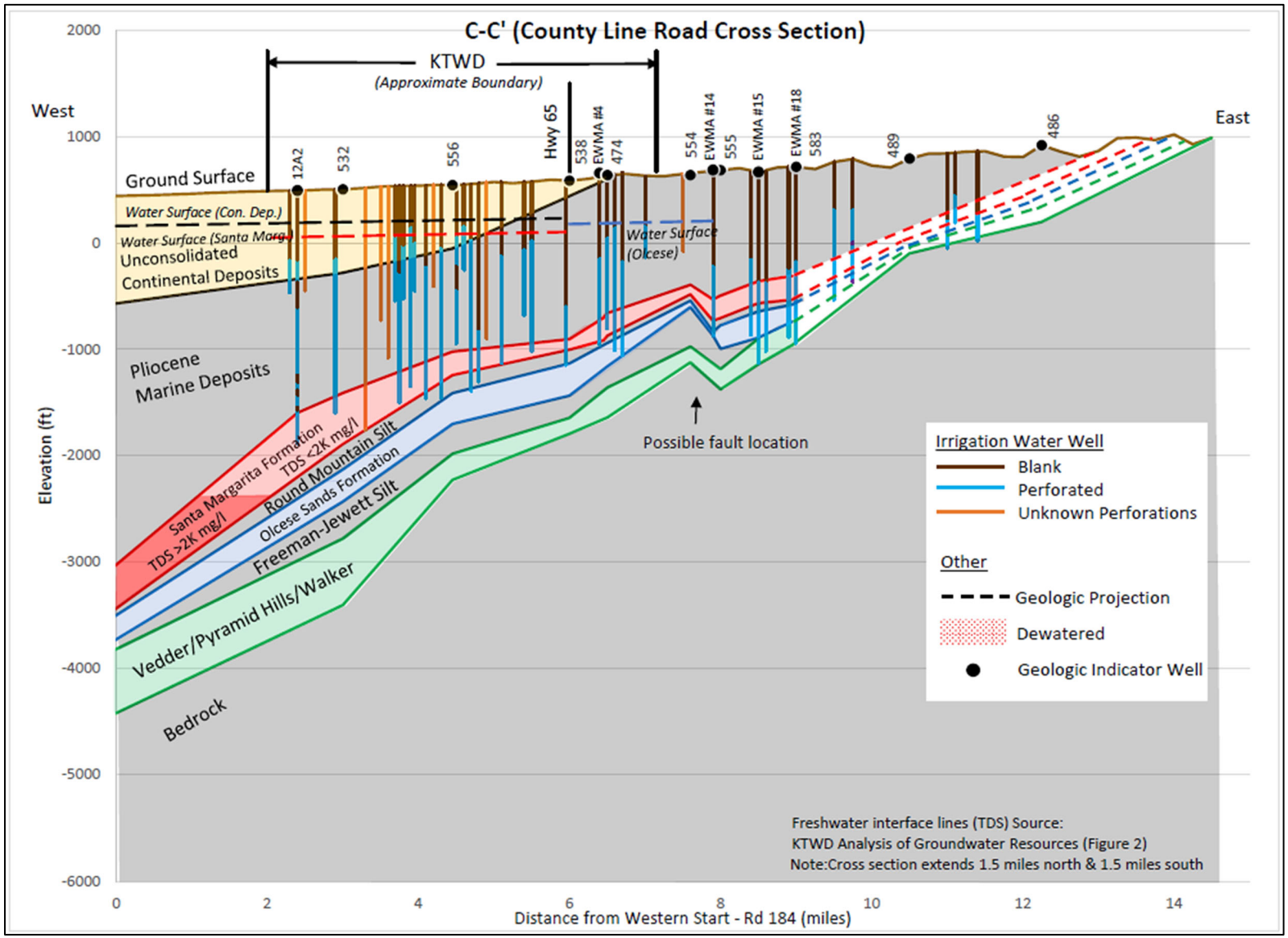

Figure 5. Deepest Aquifer Penetrated by Active Wells

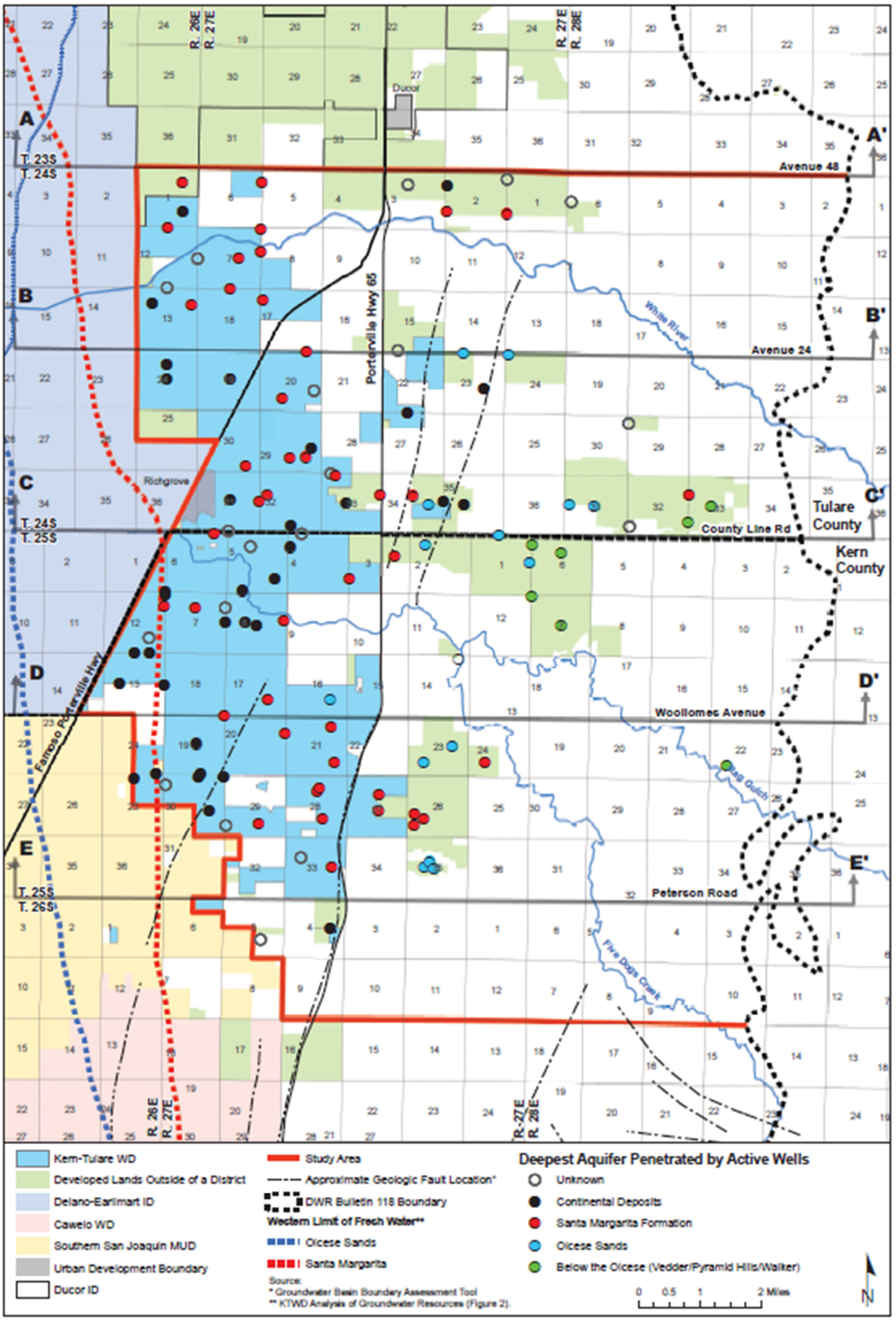
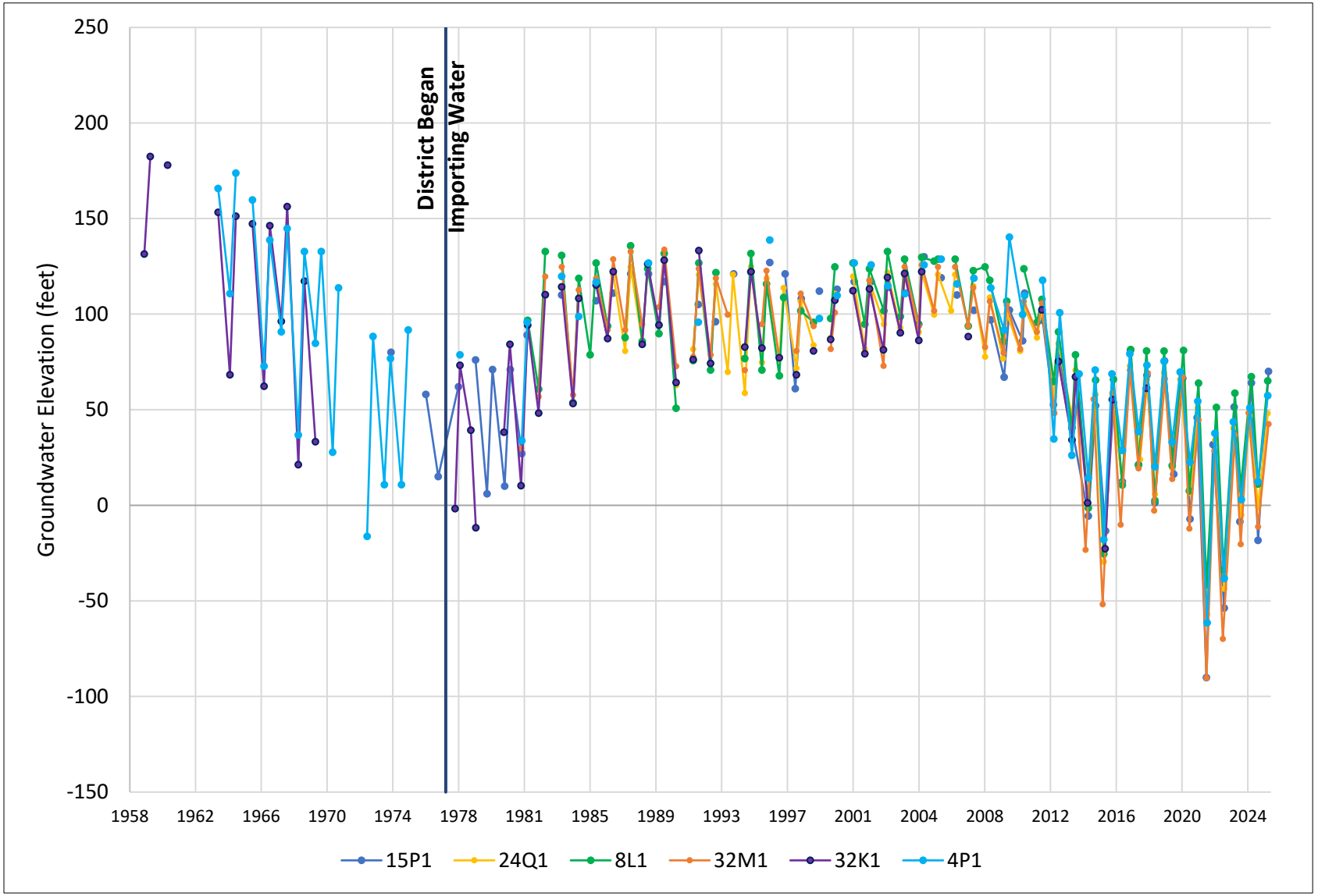
Figure 6. Historical District Groundwater Levels in the Santa Margarita Formation