



AGENDA

REGULAR MEETING OF THE BOARD OF DIRECTORS PLEASANT VALLEY GROUNDWATER SUSTAINABILITY AGENCY

June 23, 2026 @ 10:15 AM or Immediately Following PVWD Meeting

Meeting Held at:

Harris Ranch Inn & Restaurant
Belmont Room
24505 W Dorris Ave, Coalinga, CA 93210

Also made accessible by video at the link:

<https://us02web.zoom.us/j/89541663211?pwd=0tM9JqCWWd8oAE5lkPBKW1eLFLLaR3.1>

Meeting ID: 895 4166 3211

Passcode: 036941

1. Call to Order

2. Public Comment

Any member of the public may address the Board concerning any matter on the agenda. Public comment is limited to three minutes per person and no more than fifteen minutes per topic. For good cause, the meeting Chair may waive these limitations.

3. Closed Session

The Board will meet with Legal Counsel in closed session pursuant to the Government Code sections noted to discuss the following:

- a. Conference with Legal Counsel- Anticipated Litigation
Significant exposure to litigation (Pursuant to Cal. Gov. Code section 54956.9(d)(4))) – 1 potential case

4. Report from Closed Session, if any, Required by Government Code Section 54957.1

5. Consent Calendar

All items listed on the Consent Calendar are routine and non-controversial and will be acted upon by a single action of the Board of Directors, unless a Board Member requests separate consideration of the item. If such a request is made, the item may be heard as an action item at this meeting.



Board of Directors to:

- a. Consider and Discuss Approval of the Minutes of the Special Board Meeting of May 27, 2026
- b. Consider and Discuss Approval of the Accounts Payable Reports

6. Sustainable Groundwater Management Act

Serving as the Groundwater Sustainability Agency of the Pleasant Valley Subbasin:

- a. Receive an Update and/or Provide Input on Sustainable Groundwater Management Act Implementation/Compliance Activities, including the Groundwater Sustainability Plan.
- b. Provide an Update on the PVGSA Recharge Policy
- c. Provide an Update on Spring 2026 Water Levels
- d. Consider and Discuss Approval of Provost and Pritchard's On-going Engineering Services Proposal for Pleasant Valley Groundwater Sustainability Agency
- e. Consider and Discuss Approval of Resolution 05-26 Amending the PVGSA Groundwater Allocation and Use Policy
- f. Consider and Discuss Approval of the PVGSA Penalty Policy

7. General Manager's Report (Woolf)

8. General Counsel's Report (Stevens)

9. Adjournment

Accessibility

In compliance with the American with Disabilities Act, if you are a person with a disability and you need a disability-related modification or accommodation to participate in this meeting, please contact info@pvwdgsa.org. Notifications of at least 48 hours prior to a regular/special meeting will assist staff in assuring that reasonable arrangements can be made.

MINUTES OF THE SPECIAL MEETING OF
THE BOARD OF DIRECTORS OF THE
PLEASANT VALLEY WATER DISTRICT
GROUNDWATER SUSTAINABILITY AGENCY

May 27, 2026

The Board of Directors of the Pleasant Valley Groundwater Sustainability held a Special Board Meeting on Wednesday, May 27, 2026 at 24505 W. Dorris Avenue, Coalinga, CA and by teleconference. A quorum was established, and the meeting was called to order by President Anderson at approximately 10:10 a.m. Directors attending the meeting were James Anderson, Turner Christensen, Karen d'Artenay, Craig Finster, William Fisher, Joseph Lovelace, James Nichols, and Sebastian Silveira. Director Brian Whelan was not in attendance. Also in attendance were Sarah Woolf (General Manager), Lindsay Cederquist (Assistant General Manager), Lauren Layne, Wesley Henson, Emily Lovell, John Kinsey, Linda Whelan, Richard Hewitson, Cameron Hewitson, Anona Dutton, Russell McGlothlin, Peter Allbright, Bruce Allbright, Brad Gleason, Torabi Farms, Pacific Farm Management, Summer Rooks, Calvin Monreal, Alexis Stevens (General Counsel) and Donna Wilt (bookkeeper).

PUBLIC COMMENT. None at this time.

CLOSED SESSION.

- a. Conference with Legal Counsel – Anticipated Litigation
Significant exposure to litigation (Pursuant to California Government Code section 54956.9(d)(4))) - 1 potential case.

REPORT FROM CLOSED SESSION, IF ANY, REQUIRED BY GOVERNMENT CODE SECTION 54957.1. No report.

CONSENT CALENDAR.

- a. The minutes of the Regular Board Meeting on March 24, 2026 were reviewed and discussed. Director Silveira proposed edits to the March 24, 2026 Minutes. The Board reviewed and discussed the Memorandum sent by Somach Simmons & Dunn regarding edits provided by Russell McGlothlin on behalf of Gladstone Land Company. The edits were reviewed and discussed. Mr. McGlothlin commented that the March 24, 2026 Board Meeting minutes did not accurately reflect what occurred regarding the Land IQ presentation by Joel Kimmelshue. He clarified that Mr. Kimmelshue indicated the irrigated acreage may be higher than 16,000 acres but emphasized that this figure was not a definitive conclusion and was intended only as a preliminary reference point to be supported by grower input. Mr. McGlothlin stated that the March 24, 2026 minutes incorrectly stated that Director Whelan made a motion to adopt the 16,000-acre figure as the basis for determining allocations; however, the actual proposal was to use Land IQ data as a starting point, with an

- opportunity for growers to provide evidence of irrigation where Land IQ did not identify it. The 16,000-acre figure was therefore an estimate, not a fixed determination and the minutes should be revised accordingly. President Anderson motioned to accept the minutes as presented without any requested changes, which was seconded by Director Christensen. The motion was approved as follows:
AYES: Anderson, Christensen, d'Artenay, Finster and Fisher.
NOES: Lovelace, Nichols and Silveira.
ABTENTIONS: None.
ABSENTEES: Whelan.
- b. The minutes of the Regular Board Meeting on April 28, 2026 were reviewed and discussed. Director Christensen motioned to approve the April 28, 2026 Minutes which was seconded by Director Fisher. The motion was approved as follows:
AYES: Anderson, Christensen, d'Artenay, Finster, Fisher, Lovelace, Nichols and Silveira.
NOES: None
ABSTENTIONS: None.
ABSENTEES: Whelan.
Russell McGlothlin requested that the PVGSA meetings be recorded going forward in order to avoid potential issues.

SUSTAINABLE GROUNDWATER MANAGEMENT ACT. The Board reviewed and discussed the following items.

- a. Groundwater Sustainability Plan (GSP) – The Draft GSP has been provided to the State Board, but EKI has not heard back from them.
- b. PVGSA Recharge Policy – EKI is evaluating the current recharge policy and intends to provide suggestions for revisions at the June 2026 Board meeting.
- c. 2026 Allocation Confirmation Request Received After Deadline – Torabi Farms did not submit its 2026 Allocation Confirmation by the April 15, 2026 due date. Lindsay Cederquist reported that there was a lack of correspondence between the GSA and the landowner. The Board discussed accepting the landowner's request to approve its late allocation confirmation and fulfilling the Torabi Farms allocation from the 1,500 acre feet of water that was held back as a contingency for this type of situation. Director Lovelace motioned to approve the Torabi Farms 2026 Allocation Confirmation that was received after the deadline, which was seconded by Director Anderson. The Motion was approved as follows:
AYES: Anderson, d'Artenay, Finster, Fisher, Lovelace, Nichols and Silveira.
NOES: Christensen.
ABTENTIONS: None.
ABSENTEES: Whelan.
- d. PVGSA Penalty Policy – The Board reviewed and discussed the three options for the PVGSA Penalty Policy that were presented at the previous meeting. Discussion ensued. A representative from Pacific Farm Management raised questions regarding Option 3, noting that the maximum penalty of \$750 appears to reflect a combination of a \$250 base penalty plus an additional \$500 under Water Code §10732. The representative expressed concern that the draft language imposes penalties on a per

acre-foot basis that may exceed statutory authority. The representative also raised concerns about the rationale for applying maximum statutory penalties, including how the funds would be used, whether they would be allocated to capital projects, and the potential legal implications of holding such funds without a defined purpose. Pacific Farm Management also commented on the difficulty of growers budgeting for penalties set at maximum levels, and questioned whether sufficient data, such as prior year over-pumping, had been evaluated to determine the severity of the issue. The representative recommended that penalties be scaled relative to the severity of over-pumping, using data from prior years to inform the penalty amounts.

Director Lovelace motioned to table the Penalty Policy until the Recharge Policy is adopted, which was seconded by Director Silveira. The matter was put to a vote and the votes were cast as follows:

AYES: Lovelace, Nichols and Silveira.

NOES: Anderson, Christensen, d'Artenay, Finster and Fisher.

ABSTENTIONS: None.

ABSENTEES: Whelan.

The motion to table the Penalty Policy until the Recharge Policy is adopted failed. Director Anderson motioned to approve Option 3 subject to compliance with applicable law and to move forward with any necessary changes to the Allocation Policy, which was seconded by Director Fisher. The motion was approved as follows:

AYES: Anderson, Christensen, d'Artenay, Finster and Fisher.

NOES: Lovelace, Nichols and Silveira.

ABSTENTIONS: None.

ABSENTEES: Whelan.

- e. Extraction Fee – The Board reviewed and discussed the Groundwater Extraction Fee Report (Report) prepare by Provost & Pritchard. The Report explains the need for the proposed fee increase, what it will be used for, and how it was calculated. The proposed fee will be \$49.80/acre-foot based on current budget projections and will be effective for the Fiscal Year beginning July 1, 2026. President Anderson motioned to approve the Report, which was seconded by Director Christensen. The motion was approved as follows:

AYES: Anderson, Christensen, d'Artenay, Finster, Fisher and Nichols.

NOES: Lovelace and Silveira.

ABSTENTIONS: None.

ABSENTEES: Whelan.

GENERAL MANAGER'S REPORT. Sarah Woolf reported to the Board on the following,

- a. January – March 2026 Meter Readings – There are 5 meters that are inoperable. Staff is in communication with the landowners to get them fixed. The invoices will be going out before the end of May 2026. It was recommended that enforcement of the Interest Policy on outstanding invoices start on July 1, 2026, the new fiscal year. The Board directed staff to enforce the Interest Policy on outstanding invoices starting July 1, 2026.

- b. Grants – To write a new grant, it will cost \$15,000 - \$30,000. The Department of Water Resources Prop 4 Grant will be available next year. As of now, the GSA is not really in a position to apply for Grants however, staff is hopeful that the GSA will be in a position to apply for grants in 2027.

GENERAL COUNSEL’S REPORT. No report at this time.

ADJOURNMENT. The meeting was adjourned at approximately 11:53 a.m.

Respectfully submitted,

Craig Finster, Secretary

DRAFT

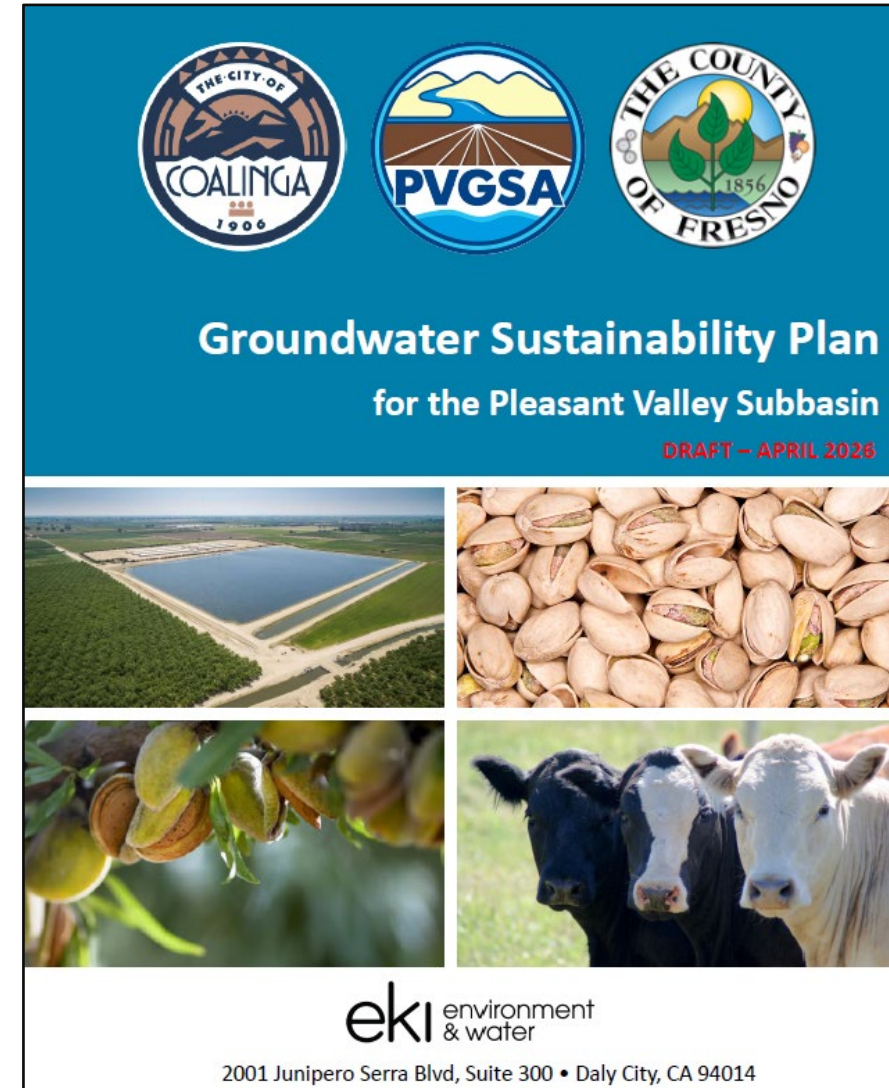
GROUNDWATER SUSTAINABILITY PLAN STATUS UPDATE

23 JUNE 2026

Presentation by:
Wesley Henson, whenson@ekiconsult.com

EKI PROGRESS REPORT JUNE 2026

- Working on responses to public comment on draft Groundwater Sustainability Plan (GSP).
- Addressing GSP questions from State Water Resources Control Board (SWRCB).
 - Clarifications in GSP to describe domestic and small-scale agricultural beneficial users for water supply.
 - Clarifications of Water Quality Sustainable Management Criteria (SMC)
 - Water budget sensitivity analysis under future conditions
 - Additional policies that will guide GSP implementation
 - Groundwater level and quality minimum threshold exceedance
 - Domestic well mitigation
- Comparative evaluation of GSA/District (Agency) recharge policies



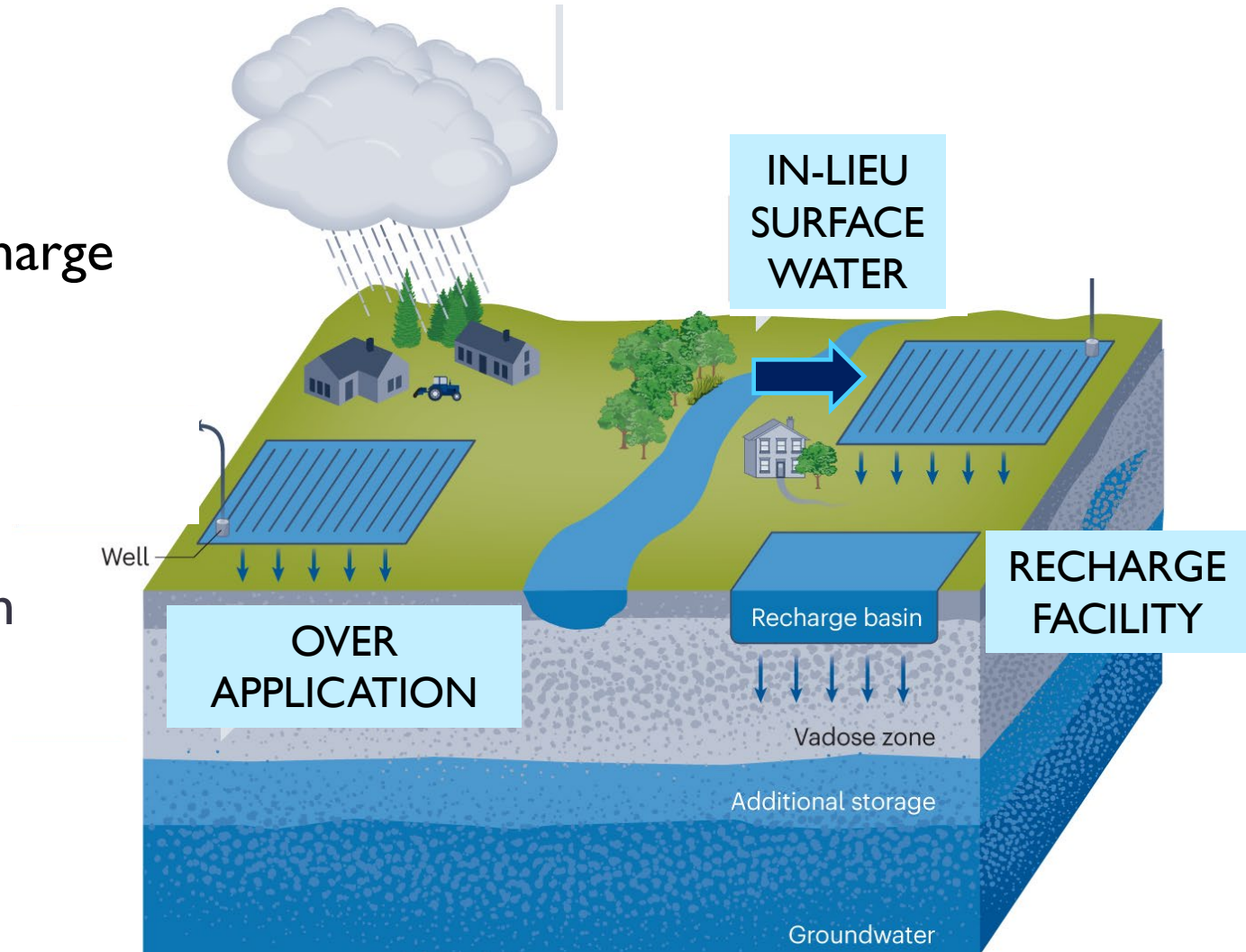
RECHARGE POLICY RECOMMENDATIONS

23 JUNE 2026

Presentation by:
Wesley Henson, whenson@ekiconsult.com

PROMOTING RECHARGE IS KEY TO GSP SUCCESS

- Recharge Types:
 - Recharge facility
 - Over-application
 - In-lieu
- Recharge Policy objectives:
 - Ensure alignment with GSP and basin groundwater sustainability.
 - Encourage investment in surface water and recharge projects.
 - Reflect current best practices.



Adapted from Rohde, M.M. Financial incentives can leverage existing infrastructure to replenish groundwater. *Nat Water* 1, 831–832 (2023).

RECHARGE POLICY EVALUATION

■ Agency Policy Review:

- Westlands/Westside District (WWD)
- Greater Kawea GSA (GKGSA)
- East Turlock GSA (ETGSA)
- Madera County GSA (MCGSA)
- White Wolf GSA (WWGSA, Under Development)

■ Key Policy Elements:

- Documentation and verification
- Leave-behind requirements
- Carry-over
- Approvals & Tools

Draft recharge policy with recommended updates will be presented at July 2026 Board Meeting.

FACILITATED RECHARGE

Requires documentation to quantify volume of percolation to the aquifer.

Recharge documentation requirements:

- diversion/recharge location and site maps;
- diversion method, date, time and rate;
- site use descriptions and photographs;
- soil infiltration characteristics;
- recharge basin capacity; and
- water application methods.

Recharge quantification methods may include:

- Water balance calculations (inflows-outflows-losses)
- Percolation estimates based on infiltration rates
- Measured infiltration and recharge observations



IN LIEU RECHARGE

Requires documentation demonstrating quantity of groundwater demand reduction.

- **Metered delivery records** - document surface water deliveries using calibrated flowmeters and district delivery records.
- **Baseline pumping comparison** - demonstrate groundwater pumping reductions relative to a defined historical baseline.
- **Parcel-Level / Landowner Water Balance** - quantify groundwater demand reductions using water-balance methods that account for crop demand, irrigation efficiency, and all water sources across a landowner/user's holdings.
- **Basin-Scale Monitoring Integration** - incorporate delivery and pumping data into groundwater accounting, modeling, and monitoring programs to verify basin-wide groundwater benefits.

These elements minimize GSA risk for crediting “paper water” that did not actually reduce pumping that can undermine the basin's path to sustainability.

EVALUATION OF LEAVE-BEHIND PERCENTAGES

GSA/District	Leave-behind	Justification / Basis
MCGSA	10-25%	Contributes to basin benefit. Leave-Behind reduction with soil suitability, percolation tests, or professional studies. Leave-behind includes evapotranspiration (ET).
WWD	10%	Contributes to basin benefit. Leave-behind does not include ET.
ETGSA	12.5%	Contributes to basin benefit. Leave-behind does not include ET.
WWGSA	10-15%	Contributes to basin benefit and estimated losses. Accounts for subsurface outflows (8%), ET (5%), and long-term storage support (5%).

Leave-behind benefits the Basin and mitigates Agency risk due to recharge volume uncertainty.

- Leave-behind factors
 - Vary among basins but typically 10-20%
 - simple default framework
 - potential for reduction with additional documentation

We recommend a Leave-behind of 20% for facilitated recharge and 10% for in-lieu surface water delivery.

EVALUATION OF RECHARGE CREDIT CARRY-OVER

Policy Feature	More Restrictive	More Permissive	Description
Carry-Over Time Limit	Greater Kawea GSA (GKGSA) has a 5-year rolling window with forfeiture after 5 years.	WWD, MCGSA, and East Turlock Subbasin GSA (ETSGSA) have no defined recharge credit carryover time limits.	Defines how long unused allocation may be held before expiring. Rolling windows prevent indefinite stockpiling and force periodic reconciliation with actual aquifer conditions. Unlimited carry-over maximizes flexibility but risks "paper water" scenarios where credits exceed what the aquifer can support each year.
Carry-Over Leave-Behind	WWD has up to 10% leave-behind after 5 years.	MCGSA and ETSGSA have no leave-behind on credit carry-over.	An annual percentage of the banked balance that is eroded over time, reflecting ongoing aquifer losses (evapotranspiration, lateral outflow, deep percolation) and discouraging indefinite accumulation. Higher leave-behind rates shift hydrological risk back to the user; zero leave-behind means the Agency bears the full risk of any gap between credited and physically recoverable water.

We recommend 5-year Carry-over time limit with annual Leave-behind of 10% for recharge credits.

POLICY ADMINISTRATION AND APPROVAL

Agency	Administration	Approval authority
GKGSA	Accounting is supported by the Kaweah Water Dashboard using Land IQ ET data.	Agency staff approve data/methods, compute, and verify credits.
ETGSA	Fully integrated accounting system for all credits applied to a Water Account in the Groundwater Accounting Platform.	Agency staff approve data/methods, compute, and verify credits.
WWD	Recharge facility approved through a District recharge application. Credits allocated by staff under Board-adopted criteria using grower application in a District-administered groundwater accounting system.	Agency staff approve data/methods, compute, and verify credits.
MCGSA	Recharge credits are administered separately from annual allocations but are posted to each Farm Unit account administered by MCGSA.	Agency staff approve data/methods, compute, and verify credits.

- Administration of credits often in an online groundwater management platform.
- Agency staff review and approve credits based upon Board approval of methods.

GENERAL RECOMMENDATIONS

Improve Data Collection

- Standardized recharge project applications
- Enhanced well and monitoring datasets
- Improved pumping and diversion records

Build Administrative Tools

- Recharge credit tracking system
- Basin groundwater accounting platform

Strengthen Technical Tools

- Update groundwater flow model
- Improve representation of recharge and pumping impacts
- Support evaluation of policy interactions

Refine Spatial Representation

- Higher-resolution model grid
- Improved agricultural demand and ownership representation
- Better linkage between water sources and places of use

Outcome will be more defensible recharge credits and groundwater management actions.

DRAFT 18 June 2026

To: Sarah Woolf
General Manager
Pleasant Valley Groundwater Sustainability Agency (PVGSA)

From: Anona Dutton, PG, CHg, EKI Environment & Water, Inc. (EKI)
Wesley Henson, PhD (EKI)

Subject: Recharge Policy Review and Recommendations (C50207.01)

EKI Environment & Water, Inc. (EKI) has prepared this recharge policy review and recommendations to support an update to the Pleasant Valley Groundwater Sustainability Agency (PVGSA) Recharge Policy adopted 9/25/2025 (Recharge Policy).

RECHARGE POLICY REVIEW

Recharge policies are an effective policy tool for Groundwater Sustainability Agencies and water districts (Agencies) that manage groundwater subbasins (Basins). For the purposes of this evaluation, recharge activities are classified into three types: (1) **Over Application** where additional water is applied to agricultural fields to recharge groundwater, (2) **Dedicated Recharge Facilities** where recharge occurs in infiltration basins, and (3) **In-Lieu Surface Water Delivery** where surface water is delivered to reduce groundwater demands for parcels owned or managed by the recharge credit applicant. Over application and dedicated recharge facilities are grouped together as facilitated recharge because the recharge credits are based on the direct application of water. Recharge credit estimation for both over application and dedicated recharge facilities requires documentation that quantifies the volume of percolation to the aquifer. In contrast, recharge credit estimation for In-Lieu Surface Water Delivery requires documentation that demonstrates the quantity of groundwater demand reduction.

Recharge policy documents developed and implemented by the following Agencies were reviewed: Westlands Water District (WWD), Madera County GSA (MCGSA), East Turlock Subbasin GSA (ETSGSA), Greater Kaweah GSA (GKGSA), and White Wolf GSA (WWGSA) whose recharge policy is under current development. In addition, the best practices outlined in the 2023 California Department of Water Resources (DWR) *Central Valley Groundwater Recharge Incentives and Strategies* policy were reviewed. Key Recharge Policy elements included:

- Leave-behind;
- Historical credits;
- Carry-over;
- Documentation and verification;
 - General considerations and justification standards for different recharge types,
 - Methods and required documentation to support administration of recharge credits; and
- Administration and approval.

Leave-behind

The concept of "Leave-behind" refers to the portion of recharged water that is not credited to the individual user but is instead retained for broader Basin sustainability or considered a hydrological loss. These constraints are primarily justified by scientific, hydrological, and regulatory imperatives aimed at achieving groundwater sustainability

The Leave-behind percentage of recharged water serves various purposes:

1. **Hydrological Efficiency:** The 0% recharge credit in the current PVGSA Recharge Policy for summer over-application directly accounts for high evapotranspiration rates during warmer months, acknowledging that not all applied water will effectively reach the aquifer. Similarly, the 10% 'Leave-behind' for over-application and dedicated recharge basins often includes evaporation, however, some Agencies provide tools for users to compute evaporation and leave flexibility in their policy to compute and adjust the recharged amount after submission of recharge credit documentation (e.g., WWD). Other Agencies, such as MCGSA, relate fractions of facilitated recharge and Leave-behind to physical properties of dedicated recharge basins. These constraints ensure that credits are only issued for water demonstrably contributing to the aquifer.
2. **Basin-Wide Sustainability:** The portions of water not credited to individual users often contribute to a groundwater allocation or general Basin replenishment. The current PVGSA Recharge Policy explicitly states that uncredited water either percolates to augment allocation or contributes to overall Basin sustainability. This collective benefit is crucial for achieving sustainability goals, such as PVGSA's objective to reach sustainable yield by 2042 and aims to prevent undesirable results like chronic lowering of groundwater levels.
3. **Regulatory Compliance and Risk Management:** The requirement for detailed documentation and State Water Resources Control Board (SWRCB) reporting (as seen in MCGSA's policy), provides a regulatory justification for credit legitimacy. Furthermore, the ability for Agencies to impose restrictions or 'leave-behind' percentages on Carry-over allocations provide a mechanism to manage overall Basin risk and adapt to changing hydrological conditions. The Agency can include a provision that will allow modification of these percentages as technical information is collected.

A comparison of Leave-behind fractions from selected other Agencies provides further insight into the practical application and justification of Leave-behind percentages (**Table 1**). There is variability among the examined policies, but the defining factors focus on providing a benefit to the Basin and mitigating Agency risk through a simple default framework with a potential for enhanced recharge credits with additional documentation.

Table 1. Comparison of Leave-behind Percentages

Agency	Leave-behind Percentage	Justification / Basis
MCGSA	10-25%	Contributes to basin benefit. Leave-Behind reduction with soil suitability, percolation tests, or professional

Agency	Leave-behind Percentage	Justification / Basis
		studies. Leave-behind likely to include evapotranspiration (ET).
ETGSA	12.5%	Contributes to basin benefit. Leave-behind does not include ET.
WWD	10%	Contributes to basin benefit. Leave-behind does not include ET.
GKGSA	None explicitly defined	Percentage is annually reviewed and considered.
White Wolf GSA	10-15%	Contributes to Basin benefit and estimated losses. Accounts for subsurface outflows (8%), ET (5%), and long-term storage support (5%).

Historical Credits

The MCGSAs facilitated recharge crediting policies for historical credits serve as a good example as they have three important qualities:

1. **Explicit cutoff date.** No credit is provided for any recharge occurring before a specific date. This constrains the amount of credited recharge to keep the “book storage” of the Basin close to the physical storage of the Basin.
2. **Crediting schema.** explicitly connected to the soil/aquifer properties. Recharge is credited on an adaptive and variable basis rather than a straight percentage. While more complex, it does provide for a more technically justified estimate of a recharge volume.
3. **Documentation.** Growers must reconstruct and document recharge volume, metered amounts, location of storage, and other particulars to claim retroactive credit. This serves two purposes: clarity/accountability and lowering the volume of retroactive crediting.

Carry-Over

Carry-over refers to the ability of a groundwater user to bank unused recharge credits or allocations from one year into future years. Defined conditions for Carry-over of recharge credits from year-to-year are an important Agency policy tool for managing the benefits and implementation of groundwater recharge policies. Carry-over policies vary considerably in their permissiveness: some Agencies specify a *Carry-Over Time Limit* imposed as a rolling window (commonly five years) and some allow unlimited Carry-over with no time constraints. In addition, some Agencies specify an annual *Carry-Over Leave-Behind* percentage that erodes the banked balance over time, or outright prohibitions on carrying over certain categories of water that do not represent intentional water management actions. A summary of the approaches from Agencies in the reviewed policies is provided in **Table 2**.

Table 2. Comparisons of Groundwater Sustainability Agency Carry-over and Transfer Policy Elements

Policy Feature	More Restrictive	More Permissive	Description
Carry-Over Time Limit	GKGSA has a 5-year rolling window with forfeiture after 5 years.	WWD, MCGSA, and ETSGSA have no defined recharge credit Carry-over time limits.	Defines how long unused allocation may be held before expiring. Rolling windows prevent indefinite stockpiling and force periodic reconciliation with actual aquifer conditions. Unlimited Carry-over maximizes flexibility but risks "paper water" scenarios where credits exceed what the aquifer can support each year.
Carry-Over Leave-Behind	WWD has up to 10% Leave-behind after 5 years.	MCGSA and ETSGSA have no Leave-behind on credit Carry-over.	An annual percentage of the banked balance that is eroded over time, reflecting ongoing aquifer losses (evapotranspiration, lateral outflow, deep percolation) and discouraging indefinite accumulation. Higher Leave-behind rates shift hydrological risk back to the user; zero Leave-behind means the Agency bears the full risk of any gap between credited and physically recoverable water.

Documentation and Verification

Recharge credit documentation for Facilitated Recharge (i.e., over-application and dedicated recharge facilities) focuses more on *hydrogeological parameters* and actual *infiltration rates*. Recharge credit documentation for In-Lieu Surface Water Delivery focuses on the *replacement* of groundwater pumping demand.

Documentation Standards for Different Recharge Types

Facilitated Recharge: Over Application and Dedicated Recharge Facilities

Facilitated recharge through over-application and dedicated recharge facilities require documentation centered on the physical movement and percolation of water into the aquifer. The Leave-behind percentage can be a mechanism to mitigate risks of uncertainty in actual recharge. In some Agencies (e.g., WWD), recharge credits are assumed to simply be a fraction of the applied water. However, in some other Agencies (e.g., MCGSA), more extensive documentation for direct recharge methods is required. The MCGSA Recharge Policy requirements include GPS coordinates of diversion, method and date/time of diversion, approximate soil infiltration rate, estimated diversion rate, recharge basin capacity, flowmeter records with photos, APN and map, site use description, water application method, and extraction well records. Quantification for these direct methods can involve water balance approaches (inflow minus outflow, adjusted for losses) or percolation calculations based on soil rates, emphasizing

actual measured infiltration into the ground. There are opportunities to base the credit on the level of documentation.

In Lieu Surface Water Delivery

For In-Lieu Surface Water Delivery, the quantification focuses on the amount of groundwater demand reduced by the substitution of surface water. As described in DWR's *Central Valley Groundwater Recharge Incentives and Strategies* document, in-lieu recharge is defined as using surface water for irrigation instead of groundwater. Quantification often involves a formula considering project duration, surface water availability, applied area, consumptive groundwater use factor, and irrigation efficiency. The ETSGSA, for instance, requires delivery statements for surface water, statements of diversion submitted to the SWRCB; dairy water delivery manifests; calibrated meter data; electrical consumption records from pump tests; run-time data from pump tests; or ETSGSA-approved water balance calculations. The ETSGSA expresses a future preference for volumetric metering to standardize and precisely measure surface water applied for irrigation. This detailed documentation underscores the focus on substantiating the *offset* of groundwater extraction.

A defensible demonstration that in-lieu surface water deliveries offset groundwater use rests on four principles:

1. **Metered delivery records.** Volumetric documentation of surface water received at the farm gate, ideally from calibrated flowmeters cross-referenced against district delivery records.
2. **Baseline pumping comparison.** A clearly defined historical base period against which current pumping is compared, with well-meter records or approved water balance calculations showing the reduction.
3. **Parcel-level / Landowner water balance.** An approved methodology that accounts for crop ET, irrigation efficiency, and all water sources to isolate the groundwater demand reduction attributable to the in-lieu delivery. This analysis can occur on a parcel or across all parcels belonging to a single landowner/user to ensure that groundwater demand reduction attributable to the in-lieu delivery is occurring across all applicable parcels (i.e., any in-lieu benefit is not being offset by an increase in landowner pumping elsewhere in the Basin).
4. **Basin-scale monitoring integration.** Incorporation of delivery and pumping records into the Agency's groundwater flow model and annual reporting, with groundwater level monitoring in representative wells to confirm that basin-scale aquifer response is consistent with the claimed offset/benefit.

Without all four of the above elements, an Agency risks crediting water that did not actually reduce pumping, creating a form of "paper water" that undermines the Basin's path to sustainability under SGMA.

Approaches Used to Adjust Recharge Credits and Associated Leave-Behind.

Different Agencies offer varying mechanisms for crediting and enhancing recharge volumes (**Table 3**). For example, the MCGSA's policy provides a baseline recharge credit of 75% for diverted flood water. However, it also incentivizes enhanced documentation by offering up to an additional 15% credit, not

exceeding a total of 90%, based on specific site conditions. This performance-based crediting encourages landowners to provide more robust hydrogeological data.

Key documentation used to justify increased recharge credit percentages include:

Soil Suitability Analysis: Documenting soil suitability using the Modified Soil Agricultural Groundwater Banking Index (SAGBI) can increase recharge credit by 5% to 15%. An 'Excellent' rating (at least 50% of the site) yields +15% credit, 'Good' yields +10%, and 'Moderately Good' yields +5%. This leverages a recognized scientific method for assessing infiltration capacity.

Percolation Test Results: Submitting results from soil boring and/or percolation tests, certified by a registered geotechnical engineer or agronomist, provides direct technical measurement of water infiltration. A percolation rate greater than 1 inch per hour over 12 hours grants +15% credit, while a rate greater than 0.5 inch per hour over 12 hours grants +5%.

Groundwater Recharge/Seepage Study: A comprehensive study prepared by a certified professional (engineer, geologist, or hydrogeologist) can justify an increase over the baseline percentage, not exceeding an additional 15%. This provides expert analysis and technical justification for a site's enhanced recharge potential.

Table 3. Examples of Enhanced Documentation for Increased Recharge Credits

Enhanced Documentation	Justification/Method	Additional Credit
Soil Suitability (SAGBI Rating)	Excellent (at least 50% of site)	+15%
	Good	+10%
	Moderately Good	+5%
Percolation Test Results	>1 inch/hour over 12 hours (certified professional)	+15%
	>0.5 inch/hour over 12 hours (certified professional)	+5%
Groundwater Recharge/Seepage Study	Prepared by certified engineer, geologist, hydrogeologist	+15%

This tiered credit system in MCGSA contrasts with the more fixed crediting fractions used in other recharge policies.

POLICY ADMINISTRATION AND APPROVAL

There is some variability in how recharge credits are administered and approved in the policies that were evaluated. Some policies integrate groundwater accounting for allocation, recharge, and transfers. In many policies: (1) a robust groundwater accounting system is implemented for administration, and (2) evaluation and approval of credits is delegated to Agency staff using Board approved standards and data collected in formalized recharge credit applications. A summary of the administration and approval is provided in **Table 4**.

Table 4. Comparison of Administration and Approval Authority

Agency	Administration	Approval authority
MCGSA	Recharge credits are administered separately from annual allocations but are posted to each Farm Unit account administered by MCGSA.	Agency staff approve data/methods, compute, and verify credits.
ETGSA	Fully integrated accounting system for all credits applied to a Water Account in the Groundwater Accounting Platform.	Agency staff approve data/methods, compute, and verify credits.
WWD	Recharge facility approved through a District recharge application. Credits allocated by staff under Board-adopted criteria using grower application in a District-administered groundwater accounting system.	Agency staff approve data/methods, compute, and verify credits.
GKGSA	Accounting is supported by the Kaweah Water Dashboard using Land IQ ET data.	Agency staff approve data/methods, compute, and verify credits.

PROPOSED PVGSA RECHARGE POLICY ADJUSTMENTS

Based on the review of comparable recharge policies, a high-level overview of suggested adjustments to sections of the current PVGSA Recharge Policy are provided below. These proposed revisions further clarify and refine recharge credits, Leave-behind, Carry-over, and groundwater transfers. Following the specific policy recommendations, we suggest improvements to documentation and tools to address future Recharge Policy implementation challenges. A draft redline of the Recharge Policy is included as **Attachment A**.

1. Background and purpose:
 - a. explain PVGSA is acting on behalf of all GSAs
 - b. Provide references for statutory authority

- c. Delineate natural and facilitated recharge and indicate that recharge credit policy only applies to facilitated recharge at pre-qualified locations or in-lieu recharge from surface water delivery that reduces groundwater demands.
2. Definitions
 - a. Add glossary
3. Registration:
 - a. Clarify registration process to pre-qualify recharge project locations.
 - b. Clearly define the role of the General Manager in approval of a recharge project.
4. Recharge Credits
 - a. Develop credits
 - i. Indicate that all credits subject to GSA approval with sufficient data to document that the facilitated recharge project resulted in a quantifiable reduction of total groundwater demand for all the applicant's parcels.
 - ii. Reference an application for recharge credit to be developed.
 - iii. Add specific language on Leave-behind justification (see **Table 5**).
 - vii. Provide suggested summary table of recharge credit fractions (see **Table 5**).
 - b. Carry-over;
 - i. Better define Carry-over definitions.
 - ii. Implement a 5-year rolling period for Carry-over, with 10% Leave-behind per year and forfeiture after five years to encourage primary use of credits and to mitigate risk of long-term Carry-over.
5. Recharge Project Reporting
 - a. Consider allowing PVGSA 30 days for evaluation of recharge project reporting.
6. Effective Date
 - a. Clarify effective dates for retroactive and future credits.
7. Indemnification
 - a. Have legal counsel review updated recharge policy.

Table 5. Suggested Recharge Credit Fractions by Recharge Method

Recharge Method	Winter Credit (Oct 1 - Mar 31)	Summer Credit (Apr 1 - Sep 30)	Leave-behind Justification
Over Application	80%	0% (Not Applicable)	The 20% Leave-behind in winter is designed to add a benefit to the Basin. Over application of irrigation in the summer is assumed to be consumed as ET.

Recharge Method	Winter Credit (Oct 1 - Mar 31)	Summer Credit (Apr 1 - Sep 30)	Leave-behind Justification
Dedicated Recharge Facilities	80%	80%	The 20% Leave-behind accounts for ET and other losses, as well as adding a benefit to the Basin.
In-Lieu Surface Water Delivery	90%	90%	The 10% Leave-behind is designed to add a benefit to the Basin.

Specific Recommendations for Data Collection and Tool Improvement

Robust evaluation of recharge credits from the Recharge Policy will need to consider interactions among other PVGSA policies as well as uncertainty in the representation of water use in the Basin. Operational challenges arise from acknowledged uncertainties in the existing well inventory, the location and timing of pumping, and the place of use impede accurate measurement and verification essential for credit documentation. We suggest the following:

1. Develop a registration form for collecting initial data to pre-qualify recharge projects. Collect information such as GPS coordinates, photos, APN, site map, site use description, water source, water application method, recharge method, recharge basin bathymetry or capacity, and how recharge credits will be tracked (e.g., monthly gage or depth measurements).
2. Develop an application and spreadsheet form for a water balance method to collect standardized information for documenting and validating recharge credit applications. Requirements should include method and date/time of diversion, estimated diversion rate, and a time-series of flowmeter or depth records.
3. Develop and implement a Basin groundwater accounting framework. Implement a comprehensive platform to collect and manage groundwater accounting. Ensure the implementation is flexible enough to adjust to updates to allocation and recharge policies.
4. Collect and refine well network data. Acquire construction data for the Representative Monitoring Wells (RMWs) and require data for the wells used to justify recharge volumes so that the location and effects of MT exceedances can be better understood and used to constrain the evaluation of recharge credits and recharge credit transfers.
5. Update the Basin groundwater flow model to better facilitate implementation of related GSP policies. The model can be further refined to support evaluation of recharge credits and recharge policy implementation with respect to other PVGSA policies that define groundwater level and water quality MT exceedance response, groundwater allocation, and groundwater trading (if developed). These evaluations will benefit from an enhanced model tool that can better relate places of use and water supply sources.

The current model discretization and representation of agricultural areas is coarse leading to challenges in representing supply source and place of use as well as quantifying local impacts of recharge activities and water demands from complex multi-parcel agricultural operations by the same landowner. As such, we suggest implementing the following refinements, at a minimum to the model:

- a. **Increase spatial resolution of model grid** to better relate the size of fields and recharge facilities to the simulated water levels.
- b. **Update water balance subregions** to better reflect agricultural supply and demand and multi parcel land ownership and management.

The above review of recharge policies provides a basis to guide refinements to the PVGSA Recharge Policy. We look forward to discussing these recommendations at your earliest convenience. Please do not hesitate to contact me with any questions.

Very truly yours,

EKI Environment & Water, Inc.

A handwritten signature in blue ink, appearing to read 'Anona L. Dutton', with a long horizontal flourish extending to the right.

Anona L. Dutton, P.G., C.Hg.

Chief Executive Officer / Principal-In-Charge

PROVOST & PRITCHARD CONSULTING GROUP

455 W Fir Ave • Clovis, CA 93611 • (559) 449-2700
www.provostandpritchard.com

June 2, 2026

James Anderson
Pleasant Valley Groundwater Sustainability Agency
PO Box 468
Coalinga, CA 93210

Subject: On-going Engineering Support Services for the Pleasant Valley Groundwater Sustainability Agency

Dear Brad:

Thank you for the opportunity to submit this proposal to provide on-going engineering support services for the Pleasant Valley Groundwater Sustainability Agency (PVGSA). This proposal discusses our understanding of the engineering services the PVGSA is seeking from Provost & Pritchard Consulting Group (P&P), recommends a scope of services together with associated fees, sets forth our assumptions and discusses other services that may be of interest to the PVGSA.

PROJECT UNDERSTANDING

We understand that PVGSA is in the process of identifying and prioritizing various tasks for the 2026-2027 fiscal year and has requested P&P provide engineering services in support of these projects. For budgetary purposes, P&P provides the following proposal along with the estimated fees.

P&P will perform work as directed by the PVGSA Board. The following tasks have been identified and are described below. P&P will submit a proposal for additional tasks from the board that do not fit under the below phases.

SCOPE OF SERVICES

Our proposed scope of work for this proposal is segregated into several phases, described below.

PHASE BORD: BOARD MEETINGS

This phase includes all work associated with preparing for and attending board meetings.

Deliverables

- As directed by PVGSA Board.

PHASE GEN: GENERAL ENGINEERING AS DIRECTED BY THE BOARD

This phase includes general engineering activities as requested by the Board. Including the following:

- On-Call Services,
- Board Administration Services
- Water Policy Development,
 - Demand Management,
 - Recharge Policy,

- Domestic Well Mitigation
- Miscellaneous technical efforts (ex. coordinate cGPS, installing pressure transducers in RMS wells, etc.).

Deliverables

- *As directed by PVGSA Board.*

PHASE GSP: COORDINATION WITH HYDROGEOLOGIST (SUBCONSULTANT)

This phase includes work associated with activities with the including a subconsultant to assist with addressing the inadequacies from DWR on the 2024 GSP submittal. Including but not limited to the following:

- Submitting data collected to the subconsultant, including:
 - Groundwater levels,
 - Past stream data,
 - Historic Rain data,
 - Extraction amounts,
 - Water Quality Data,
- Team Meetings with Subconsultant, and State Board as a representative of the GSA.

Deliverables

- *Transfer of Data.*

PHASE OR: OUTREACH

This phase includes outreach efforts to comply with the GSP.

Deliverables

- *Outreach memos prepared after each outreach engagement.*

PHASE RPRT: ANNUAL REPORT

This phase includes preparing and submitting the Annual Report. Includes collecting and compiling all the data and preparing the Final Annual Report for the given year.

Deliverables

- *Submission of Annual Report.*

PROFESSIONAL FEES

Provost & Pritchard Consulting Group will perform the services in this proposal on a time and materials basis, in accordance with our Standard Fee Schedule in effect at the time services are rendered. These fees will be invoiced monthly as they are accrued.

PROPOSED FEE	
PHASE	ESTIMATED FEE
Phase BORD	\$5,000
Phase GEN	\$57,000
Phase GSP	\$30,000
Phase OR	\$5,000
Phase RPRT	\$55,000
Total Estimated Fee:	\$152,000

The line items shown above are estimates and are not intended to limit billings for any given Phase. Total billings will not exceed the Total shown without additional authorization. If the scope changes materially from that described above, as a result of the client or any approving agency's decision, we will prepare a revised estimate of our fees for your approval before we proceed.

SCHEDULE

Each phase will have a separated schedule and will be identified at the time the Board or Board Representative executes the contract and authorizes P&P to perform the work.

ASSUMPTIONS

- The work proposed under each phase will be performed and billed on a time and materials basis. The estimates are for budgetary purposes only.
- The estimates are subject to change due to yearly fee increases. The Board will be notified of such increases when they occur and/or prior to the authorization of the work.

ADDITIONAL SERVICES

The following services are not included in this proposal, however these and others can be provided at additional cost, upon request.

- Representation at Board meetings other than the PVGSA.
- Solicit additional proposals for a GSA Subconsultant,

TERMS AND CONDITIONS

If this proposal is acceptable, please sign this Proposal and the Consultant Services Agreement, and return a copy to our office. These documents will serve as our Notice to Proceed. This proposal is valid for 30 days from the date above.

Sincerely Yours,
Provost & Pritchard Consulting Group


Calvin Monreal, RCE 65453
Director of Operations


Alex Collins, RCE 78242
Chief Operations Officer

TERMS AND CONDITIONS ACCEPTED

By Pleasant Valley Groundwater Sustainability Agency

Signature

Printed Name

Title

Date

RESOLUTION NO. 05-26

**RESOLUTION OF THE PLEASANT VALLEY GROUNDWATER SUSTAINABILITY
AGENCY BOARD OF DIRECTORS AMENDING THE GROUNDWATER
ALLOCATION AND USE POLICY**

WHEREAS, the Pleasant Valley Groundwater Sustainability Agency (“PVGSA” or “Agency”) was formed in 2016 pursuant to Water Code section 10720 et seq. for the purpose of managing groundwater to prevent overdraft and ensure long-term groundwater sustainability in the Pleasant Valley Subbasin (Subbasin); and

WHEREAS, Water Code section 10725.2 authorizes PVGSA to adopt rules, regulations, ordinances, and resolutions for the purposes of complying with the Sustainable Groundwater Management Act (SGMA) and perform any act necessary and property to carry out the purposes of SGMA; and

WHEREAS, the PVGSA adopted the Groundwater Allocation and Use Policy (Allocation Policy) on November 20, 2025; and

WHEREAS, the PVGSA intends to adopt a Penalty Policy to further support its management of the Subbasin; and

WHEREAS, the PVGSA has determined that amendment of the Allocation Policy is necessary to ensure the Allocation Policy is consistent with the Penalty Policy to be adopted; and

WHEREAS, the current Allocation Policy allows groundwater users that extract groundwater in excess of their annual allocation one year to cure the overextraction before they become subject to any penalty for the overextraction; and

WHEREAS, in order to discourage groundwater users from continuing to use groundwater in excess of the Subbasin’s sustainable yield and their annual allocation, the PVGSA intends to adopt a Penalty Policy that will require groundwater users that extract groundwater in excess of their annual allocation to pay a penalty and cure any overextraction within one year; and

WHEREAS, the PVGSA therefore wishes to amend Sections 8.1 and 8.2 of the Allocation Policy to ensure it is consistent with the Penalty Policy to be adopted.

NOW THEREFORE, BE IT RESOLVED by the Board of Directors of Pleasant Valley Groundwater Sustainability Agency that:

1. Section 8.1 of the PVGSA Allocation and Policy shall be amended as follows:

8.1 One-Year Cure Period. A User ~~may~~must cure an Overextraction within the year following the Overextraction ~~by either under pumping their Allocation during that year, obtaining Allocation from another User through a Transfer, or a combination of both.~~

2. Section 8.2 of the PVGSA Allocation Policy shall be amended as follows:

8.2 Violations. Any ~~User that fails to cure an~~ Overextraction ~~during the one year cure period specified in Section 8.1,~~ will be subject to civil penalties, as authorized by Water Code section 10732. The PVGSA may also ~~enforce~~prevent protracted Overextraction or non-compliance with this Policy by denying, suspending, or revoking Allocation or through other action as authorized by law.

3. All other provisions of the Allocation Policy remain unchanged.

PASSED, APPROVED, AND ADOPTED by the Board of Directors of Pleasant Valley Groundwater Sustainability Agency on this 23rd day of June 2026, by the following votes:

AYES:

NOES:

ABSTENTIONS:

ABSENT:

President, Board of Directors
Pleasant Valley Groundwater Sustainability Agency

Secretary, Board of Directors
Pleasant Valley Groundwater Sustainability Agency

Pleasant Valley Groundwater Sustainability Agency

Penalty Policy
Adopted [DATE]

1. PURPOSE AND AUTHORITY

The Pleasant Valley Groundwater Sustainability Agency (PVGSA) adopts this Penalty Policy (Policy) pursuant to the Sustainable Groundwater Management Act (SGMA) (Water Code § 10720 et seq.). SGMA authorizes groundwater sustainability agencies to regulate groundwater extraction and to impose civil penalties for extractions in excess of authorized amounts.

This Policy establishes the standards and procedures for assessing penalties for extractions in excess of a User's Allocation and for requiring corrective actions necessary to address and mitigate the impacts of such extractions. The assessment and imposition of penalties are intended to promote compliance, deter violations, and protect the sustainability of the Basin. All penalties imposed under this Policy shall be consistent with PVGSA's statutory authority, including Water Code §§ 10725.2 and 10732.

2. SCOPE AND APPLICABILITY

This Policy applies to all Users within the PVGSA's jurisdiction and governs all penalties imposed during the Transition Period.

3. DEFINITIONS

For purposes of this Policy, all capitalized terms not defined herein shall have the same meaning as set forth in the PVGSA Groundwater Allocation and Use Policy.

- 3.1 Cure Period means the one (1) Year period following issuance of a Penalty Notice during which a User must cure an Overextraction in accordance with Section 5 of this Policy.
- 3.2 Penalty Notice means the written notice issued by the General Manager or his/her authorized designee pursuant to this Policy notifying a User of his/her Overextraction, violation of this Policy or violation of the PVGSA Groundwater Allocation and Use Policy and the imposition of penalties associated therewith.
- 3.3 Reserve Pool means the quantity of Sustainable Yield Allocation reserved during any Year in the discretion of the PVGSA Board or any Sustainable Yield that is not initially allocated in any Year as a result of a User's failure to timely file an Annual Allocation Confirmation.
- 3.4 Unauthorized Use of Groundwater means extraction of groundwater from the Basin by a person without an Allocation Account.

4. PENALTIES

- 4.1 Overextraction and Unauthorized Use of Groundwater. Any Overextraction or Unauthorized Use of Groundwater shall be subject to a civil penalty of up to \$500 per acre-foot and such Overextraction or Unauthorized Use of Groundwater must be cured within the Cure Period.
- 4.2 Policy Violations. A person who violates any provision of this Policy or the PVGSA Groundwater Allocation and Use Policy shall be subject to a civil penalty of up to \$1,000, plus \$100 per day for each day the violation continues, if the person fails to comply within thirty (30) days of receiving a Penalty Notice from the PVGSA.
- 4.3 Cumulative Penalties. Penalties imposed under this Policy are cumulative and not exclusive. PVGSA may pursue any other remedies available at law or in equity, including injunctive relief to halt unauthorized extraction and recovery of fees, penalties, and enforcement costs.

5. CURE FOR OVEREXTRACTION

- 5.1 Permitted Cure Methods. Overextraction and the Unauthorized Use of Groundwater may be cured only by one or more of the following methods, subject to PVGSA verification and accounting:
- (a) Deduction from Future Allocation. The User may cure Overextraction by debiting the Overextraction quantity from the User's Allocation Account, thereby reducing the User's Allocation Account by the Overextraction quantity. Users with a negative balance in their Allocation Account are not allowed to utilize this cure method.
 - (b) Purchase from a Willing Seller In Basin. The User may cure the Overextraction or Unauthorized Use of Groundwater by acquiring additional Allocation from another User in the Basin in accordance with applicable rules related to Transfers as provided in the PVGSA Groundwater Allocation and Use Policy.
 - (c) Purchase from the PVGSA Reserve Pool (If Available). The User may cure Overextraction by purchasing the Overextraction quantity from the PVGSA Reserve Pool. Purchase of Reserve Pool water is subject to availability and PVGSA's then-applicable pricing.
- 5.2 Failure to Cure. If a User fails to cure the entirety of the Overextraction by end of the Cure Period, PVGSA will debit the User's Allocation Account, including future Allocations, in an amount equal to any uncured Overextraction and/or

pursue any other available remedies, including denial, suspension or revocation of future Allocations, injunctive relief, and/or recovery of enforcement costs.

6. PENALTY NOTICE

- 6.1 Authorization. The General Manager, or his/her designee, is authorized to issue a Penalty Notice for Overextraction, Unauthorized Use of Groundwater or a violation of this Policy or the PVGSA Groundwater Allocation and Use Policy.
- 6.2 Contents of Penalty Notice. The Penalty Notice shall include: (1) identification of the Year in which the Overextraction, Unauthorized Use of Groundwater or violation occurred; (2) the quantity of Overextraction expressed in acre-feet or a brief description of the violation, as applicable; (3) the penalty amount due; (4) the penalty payment due date; (5) a description of the appeal process and applicable deadlines; (6) a statement of consequences for late or nonpayment of the penalty amount due; and (7) a description of the Cure Period and available cure options, if applicable.

7. PAYMENT OF PENALTY

- 7.1 Penalty Payment Due Date. The penalty amount stated in a Penalty Notice is due on the date stated in the Penalty Notice.
- 7.2 Interest on Unpaid Penalties. Any unpaid penalty amount shall accrue interest at a rate of 1% per month, commencing on the day after the penalty payment due date stated in the Penalty Notice until paid in full.
- 7.3 Suspension of Allocation for Nonpayment. Failure to pay any penalty due, including accrued interest, within one (1) year of the penalty payment due date, will result in suspension of any Allocation to the User until all amounts due are paid in full.

8. APPEALS

A User may appeal a Penalty Notice. Any appeal of a Penalty Notice must conform with Section 11 of the PVGSA Groundwater Allocation and Use Policy.