

**Westlands Water District
Finance and Administration Committee**

Notice of Regular Meeting and Agenda

Notice is hereby given that a regular meeting of the Finance and Administration Committee of the Board of Directors of Westlands Water District will be held on October 20, 2026, at 8:30 a.m. at the District's Fresno Office, 286 W. Cromwell Avenue, Fresno, California 93711.

Any member of the public may participate in the meeting through Zoom

Join the meeting from a computer, tablet or smartphone:

[Join Zoom](#)

Meeting ID: 878 9554 7216

Passcode: 3130

Dial-In Number:

(669) 900-9128

Use the meeting ID and passcode from above

After you join, please mute your line.

If you have problems using the Zoom prior to the start of the meeting, please contact the District's IT staff at 559-224-1523 or itstaff@wwd.ca.gov.

Committee Members

William Bourdeau, Chair
Justin Diener
Jeff Fortune
Jeremy Hughes

Meeting Agenda

Public Comment: Any member of the public may address the Committee concerning any matter on the Agenda when the item is considered by the Committee. 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. Reminder that this meeting is being recorded.

Pursuant to the Brown Act any person who willfully disrupts the meeting to render orderly conduct of the meeting infeasible, or who refuses to comply with the orders of the Chair, may be removed from the meeting. While the Committee welcomes public participation, it does not endorse any remarks or conduct that fail to uphold commonly understood standards of civility and decorum.

1. Call to Order

The Chair may acknowledge Committee members participating remotely as authorized by Government Code Section 54950 et seq.

2. Committee to Consider Modifications, Corrections or Additions to the Agenda of Items, as authorized by Government Code Section 54950 et seq.
3. Committee to Consider Approval of Minutes of the Regular Meeting of the Finance and Administration Committee of the Westlands Water District Finance and Administration Committee of March 17, 2026
4. Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Request for Waiver of Authorized General Manager Actions Under Article 1 Section 1.9B and Article 2 Sections 2.6G and 2.6H – Friedenbach Family Farms LLC
5. Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Request for Waiver of Authorized General Manager Actions Under Article 1 Section 1.9B and Article 2 Sections 2.6G and 2.6H – Cantua Creek Vineyards I, II, III & IV LLC
6. Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Request for Waiver of Authorized General Manager Actions Under Article 1 Section 1.9B and Article 2 Sections 2.6G and 2.6H – ACDF LLC
7. Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Request for Waiver of Authorized General Manager Actions Under Article 1 Section 1.9B and Article 2 Sections 2.6G and

2.6H – Tafazoli Yazdi/Abazari Revocable Trust

8. Consider Recommendation to the Board to Adopt a Policy for the Transfer of Water Out of the District

9. Consider Other Post Employment Benefits (OPEB) Prefunding

10. **Public Comment** - Any member of the public may address the Committee concerning any matter not on the Agenda but within the Committee's jurisdiction. Public comment is limited to three minutes per person and no more than fifteen minutes per topic. For good cause, the Committee Chairperson may waive these limitations. In accordance with the Brown Act, the Committee cannot act on any items not on the agenda. Public questions and comments on items listed on the Agenda will be accepted at the time the item is considered by the Committee.

11. **Adjournment**

Order of Business

The order of business reflected in this Agenda is subject to change.

Accessibility

A person with a qualifying disability under the Americans with Disabilities Act of 1990 may request the District provide a disability-related modification or accommodation in order to facilitate that person's participation in any public meeting of the District. Such assistance includes appropriate alternative formats for the agendas and agenda packets used for any public meetings of the District. Requests for such assistance may be made in person at the District's Fresno office, which is located at 286 W. Cromwell Avenue, Fresno, California, 93711, by telephone (559-224-1523), facsimile (559-241-6277), email to Abby Castillo (acastillo@wwd.ca.gov), or written correspondence addressed to Westlands Water District, Attn: Abby Castillo, P.O. Box 5199, Fresno, California 93711. Notifications of at least 48 hours prior to the meeting will assist staff in assuring that reasonable arrangements can be made.

Remote Participation by Members of the Public

At this time, the District permits any member of the public to participate in meetings of its Board and Committees from any location by telephone or video, or both. Remote participation by members of the public from any location is offered as a courtesy and is not required by law. Telephone and internet access and reliability varies widely, and District staff may not be able to assist members of the public with technical difficulties. To avoid issues that may arise from participating remotely by phone or video, members of the public who wish to provide public comment are encouraged to attend in person at a noticed location.

At the appropriate time to provide the comment, members of the public wishing to comment will be acknowledged by the Chair of the meeting. Members of the public participating by video should use the "Raise Hand" tool located in Zoom meeting link when seeking to provide public comment on an item.

Document Availability

Written material related to an item on this agenda that is distributed less than 72 hours prior to this meeting to at least a majority of the members of the legislative body will be available for inspection at the District's Fresno office, which is located at 286 W. Cromwell Avenue, Fresno, California, 93711. Electronic material related to an item on this agenda that is distributed electronically less than 72 hours prior to this meeting will be made available on the District's website (<https://wwd.ca.gov/>).

Written material distributed during a public meeting will be available for public inspection at the meeting, if prepared by District staff or a member of its legislative body, or after the meeting if prepared by some other person.

Disclosure

This agenda has been prepared pursuant to applicable laws of the State of California, including but not limited to, Government Code section 54950 et seq. The agenda and information to support items on the agenda have not been prepared to inform an investment decision concerning the District, including in any of District's bonds, notes, or any other financial obligations. Any projections, plans, or other forward-looking statements included in the information in this agenda or the information supporting the items on the agenda are subject to a variety of uncertainties that could cause any actual plans or results to differ materially from such statements. The information in this agenda and the information supporting the items on the agenda are not intended to be used by investors or potential investors in considering the purchase or sale of the District's bonds, notes, or other financial obligations. Investors and potential investors should rely only on information filed by the District on the Municipal Securities Rulemaking Board's Electronic Municipal Market Access System for municipal securities disclosures and the District's Investor Relations website, maintained on the World Wide Web at emma.msrb.org and wwd.ca.gov/investor-relations, respectively. For purposes of this note, "District" means Westlands Water District, Westlands Water District Distribution District No. 1, Westlands Water District Distribution District No. 2, San Luis Unit/Westlands Water District Financing Authority, and/or Westlands Water District Financing Corporation.

Minutes of the Finance and Administration Committee of Westlands Water District March 17, 2026

A regular meeting of the Finance and Administration Committee was held on March 17, 2026, at 8:30 a.m., at the District's Fresno Office, 286 W. Cromwell, Fresno, CA 93711.

Finance and Administration Committee present:

William Bourdeau, Chair (Absent)
Jeff Fortune
Justin Diener
Jeremy Hughes

Staff present:

Allison Febbo, General Manager
Jose Gutierrez, Assistant General Manager
Stephen Farmer, Chief Administrative Officer
Russ Freeman, Deputy General Counsel
Kelly Vandergon, Deputy General Manager, Operations and Maintenance
Sherman Dix, Deputy General Manager, Finance & Administration
Luis Magallanes, Supervisor of General Accounting
Dalia Lopez, Supervisor of Customer Accounting
Liana Leyva, Executive Assistant
Abby Castillo, Administrative Assistant

Others present:

Elisabeth Esposito, Brownstein Hyatt Farber Schreck LLP

Item 1. Call to Order

Director Diener called the meeting to order at approximately 8:31 a.m.

Item 2. Committee to Consider Corrections or Additions to the Agenda of Items, as authorized by the Government Code Section 54950 et seq.

Mr. Farmer stated that there were no additions or corrections to the agenda.

Item 3. Committee to Consider Approval of Minutes of the Regular Meeting of the Finance and Administration Committee of the Westlands Water District and Joint Special Meeting of the Westlands Water District Board of Directors on January 22, 2026.

The Committee deemed the minutes approved as submitted.

Item 4. Committee to Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions- Request for Acceptance of Late Year-End Reading-Calaveras Avenue Coalinga LP

Ms. Lopez requested the Committee to Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions- Request for Acceptance of Late Year-End Reading-Calaveras Avenue Coalinga LP. Mr. Silveira requested that the Committee accept a late year-end reading due to family bereavement. The Committee noted that multiple reminders regarding the submission deadline had been provided and stated that District Rules and Regulations must be applied consistently. Director Hughes moved to deny the waiver, and Director Fortune seconded the motion. Members of the Public offered no comments. The Committee members moved to deny the waiver with a vote as follows:

Ayes: Fortune, Diener, Hughes

Nayes: None

Absent: Bourdeau

Item 5. Committee to Consider Directing Staff to Research Long Term Recharge Agreements with District Landowners.

Mr. Dix requested that the Committee give staff direction on whether to research long-term recharge agreements with private facility owners when District recharge capacity is exceeded, and what key terms should be included. Staff stated such agreements could expand operational flexibility, increase recharge during high-need periods, and help avoid losing water due to rescheduling caps and other constraints.

Director Diener recommended that staff evaluate additional recharge program options to

help prevent a recurrence of the 14 TAF loss the District experienced this year.

Item 6. Public Comment

Director Diener asked for public comments concerning any matter not on the agenda but within the Committee's jurisdiction, however no public comments were given.

Closed Session

Ms. Esposito announced that there was no need for the Closed Session.

Report from Closed Session, if any required by Government Code Section 54957.6

Director Diener reported that there was no need for Closed Session and adjourned at 8:53 am.

Item 7. Adjournment

There being no further business, the meeting was adjourned at approximately 8:53 a.m.



Westlands Water District

DATE: October 20, 2026

TO: Finance and Administration Committee

THROUGH: Allison Febbo, General Manager
Stephen Farmer, Chief Administrative Officer

FROM: Sherman Dix, Deputy General Manager - Finance and Administration
Katarina Campbell, Deputy General Manager - Resources

SUBJECT: Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Request for Waiver of Authorized General Manager Actions Under Article 1 Section 1.9B and Article 2 Sections 2.6G and 2.6H – Friedenbach Family Farms LLC

DISCUSSION:

The purpose of this agenda item is for the Finance & Administration Committee to consider a request for a waiver of the District's Rules & Regulations submitted by Kurt Friedenbach on behalf of Friedenbach Family Farms LLC.

Policy Background

On July 21, 2026, the Board of Directors adopted amendments to the District's Rules and Regulations requiring water users to engage in "proper land stewardship" to maximize the reasonable and beneficial use of water within the District. "Proper land stewardship" means:

Water user implementation of land management best practices that are customary for similarly situated water users within the District and that are intended to minimize infestations, outbreaks or spread of weeds, pests and disease that are harmful to growing crops and fire that threatens crops and irrigation and water delivery infrastructure. It shall be improper to abandon a crop in a manner or for a duration that would permit it to become a source of any of the aforementioned conditions.

Per Article 2.4(F) of the District's Rules and Regulations, Proper Land Stewardship requires that "no water will be allocated to eligible cropland if, after providing notice and a 30-day opportunity to cure, the water user fails to cease the conduct inconsistent with Proper Land Stewardship, cure the identified issues and engage in Proper Land Stewardship." Further, per Article 2.6(G), failure to engage in Proper Land Stewardship shall "constitute a per se waste of water authorizing General Manager to remediate at the water user's cost, after oral or written notice to the water user and a 30-day opportunity to cure." These revisions were noticed in the July 24, 2026, monthly grower notice.

Timeline of Events

On August 20, 2026, Westlands Water District (District) staff identified multiple parcels owned or operated by Friedenbach Family Farms, LLC as noncompliant with the District's

ITEM 4

Rules and Regulations requiring Proper Land Stewardship. APNs 027 130 69S and 027 130 79S (474.37 acres total) had been found to contain an abandoned crop (almonds) which poses a risk for fire and could harbor crop-damaging pests. Additionally, APNs 028 181 19S, 028 210 26S, and 028 200 09S (98.72 acres total) had been found to have a widespread weed infestation, increasing the risk of fire and weed infestations that could impact District water delivery infrastructure and increase water use.

District staff issued a Notice of Violation (NOV) in accordance with District Rules and Regulations under both Article 1 and Article 2 on August 25, 2026. The NOV included a 30-day opportunity to cure the violation before further action would be taken, including assessing civil penalties. The letter was sent via certified mail on August 28, 2026; therefore, the cure period ended on September 27, 2026.

On September 25, 2026, District staff received a formal waiver request via email from Mr. Kurt Friedenbach requesting an extension of the 30-day cure period through October 28, 2026. Mr. Friedenbach has indicated he has been in discussions with contractors regarding the necessary mitigation work and that he has been working to free up funds for that purpose.

Staff recommends denial of the waiver request as the poor conditions of the identified parcels have been present for multiple years, and the dead weeds and trees pose a risk for fire and create a harbor for crop-damaging pests, which could impact District infrastructure and increase water demand. Friedenbach Family Farms, LLC, has not communicated if they have taken any mitigating actions to date to prevent impacts to neighboring lands.

If the waiver request is denied, the General Manager is authorized to take, and will take, the following actions per Article 1, Section 1.9B, and Article 2, Sections 2.6G and 2.6H:

- 1) "Freezing" the water user account.
- 2) Locking the delivery facilities, including water meters and groundwater wells that serve the parcels listed in the account.
- 3) Suspending the ability to receive allocations of water (surface and groundwater) or transfer water to or from the account.
- 4) Remediating the violation at the water user's cost if deemed necessary by the General Manager. These charges, if left unpaid, would result in further consequences per the District's Rules and Regulations and terms and conditions of water service.

PROPOSED MOTION:

Move to deny the request for waiver of District Rules and Regulations submitted by Kurt Friedenbach on behalf of Friedenbach Family Farms LLC.

RECOMMENDATION:

Approve the proposed motion.

ATTACHMENTS:

1. Waiver Request by Kurt Friedenbach dated September 25, 2026
2. Notice of Violation issued to Friedenbach Family Farms, LLC on August 25, 2026
3. Vicinity Map of Noncompliant Land

ATTACHMENT 1

From: Kurt Friedenbach <kurt@rwcalmonds.com>
Sent: Friday, September 25, 2026 3:20 PM
To: Brent Dragomanovich <bdragomanovich@wwd.ca.gov>
Cc: Peter Maraccini <pmaraccini@wwd.ca.gov>
Subject: RE: Land Stewardship Noncompliance - Friedenbach Family Farms LLC

Hi Brent,

Confirmed.

Kurt Friedenbach
RWC Almonds, LLC
650-995-3207



From: Brent Dragomanovich <bdragomanovich@wwd.ca.gov>
Sent: Friday, September 25, 2026 3:18 PM
To: Kurt Friedenbach <kurt@rwcalmonds.com>
Cc: Peter Maraccini <pmaraccini@wwd.ca.gov>
Subject: RE: Land Stewardship Noncompliance - Friedenbach Family Farms LLC

Hi Kurt,

Thanks for this information. To confirm, you are requesting an extension of the cure period to **October 28, 2026** to allow sufficient time to remove the trees and weeds from the parcels listed in the letter?

Thank you,

Brent Dragomanovich

Associate Resources Analyst

P.O. Box 5199

Fresno, CA 93755

559-241-6245 office

wwd.ca.gov

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From: Kurt Friedenbach <kurt@rwcalmonds.com>
Sent: Friday, September 25, 2026 3:07 PM
To: Brent Dragomanovich <bdragomanovich@wwd.ca.gov>
Cc: Peter Maraccini <pmaraccini@wwd.ca.gov>
Subject: RE: Land Stewardship Noncompliance - Friedenbach Family Farms LLC

Hi Brent,

I'd like to request a 30-day extension to the cure period stated in the notice. We are currently working to clear funds for the work needed. I have discussed the needed work with contractors and work can begin once this is accomplished. Thanks.

Regards,

Kurt Friedenbach
Manager, Friedenbach Family Farms, LLC
650-995-3207



Westlands Water District

August 25, 2026

Mr. Kurt Friedenbach
Friedenbach Family Farms LLC, Account # [REDACTED]
234 E Alhambra Ave
Fresno, CA 93728-3104

Subject: Noncompliance with Proper Land Stewardship Requirements (INC-0001-2, INC-0029-31)

Dear Mr. Friedenbach:

On August 20, 2026, Westlands Water District (District) staff identified multiple parcels to be noncompliant with the District's Rules and Regulations requiring Proper Land Stewardship. APNs 027 130 69S and 027 130 79S has been found to contain an abandoned crop which poses a risk for fire and a harbor for crop-damaging pests (INC-0001-2). Additionally, APNs 028 181 19S, 028 210 26S, and 028 200 09S have been found to have a widespread weed infestation (INC-0029-31). Photo documentation of the noncompliance with Proper Land Stewardship Requirements is provided in Exhibit A.

Proper Land Stewardship is defined as, "implementation of land management best practices that are customary for similarly situated water users within the District and that are intended to minimize infestations, outbreaks or spread of weeds, pests and disease that are harmful to growing crops and fire that threatens crops and irrigation and water delivery infrastructure. It shall be improper to abandon a crop in a manner or for a duration that would permit it to become a source of any of the aforementioned conditions." The District, under its authority as a California Water District and as the Groundwater Sustainability Agency for the Westside Subbasin, requires land maintenance as a condition of water service and groundwater use to maximize the reasonable and beneficial use of water and avoid waste.

Please cure the violations within 30 days of the date of this letter by removing the fallen trees and weeds from the abandoned orchards (INC-0001-2), and mowing and/or disking the weeds and brush in the three (3) parcels along the San Luis Canal (INC-0029-31). If not addressed within this timeframe, the District will discontinue water service by "freezing" the water account with an uncured violation and locking the meters that serve the parcels listed in the account. The account will be unable to receive allocations of water (surface and groundwater) and previously allocated water will not be permitted to be transferred. Additionally, the General Manager is authorized to remediate the violation at the water user's cost if the water user does not cure the violation within 30 days. These

Mr. Kurt Friedenbach
August 25, 2026
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Westlands Water District

charges, if left unpaid, would result in further consequences per the District's Rules and Regulations¹ and terms and conditions of water service.²

If you have any questions regarding this matter, please contact Brent Dragomanovich at (559) 241-6245 or bdragomanovich@wwd.ca.gov. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Farmer", is written over the printed name.

Stephen Farmer
Chief Administrative Officer

Attachment – Exhibit A

¹ <https://wwd.ca.gov/about-westlands/rules-and-regulations/>

² <https://wwd.ca.gov/wp-content/uploads/2025/01/wwd116a.pdf>

EXHIBIT A



Figure 1. APN 027 130 79S, photographed from the southwestern corner (INC-0002).



Figure 2. APN 027 130 69S, photographed from the eastern boundary looking west (INC-0001).



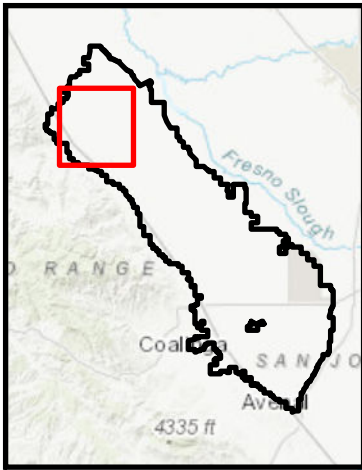
Figure 3. APN 028 181 19S, photographed from the western boundary looking east (INC-0029).



Figure 4. APN 028 210 26S, photographed from the southern boundary looking north (INC-0030).



Figure 5. APN 028 200 09S, photographed from the northern boundary along the San Luis Canal, looking southwest (INC-0031).



San Luis Canal

Adams Ave

Douglas Ave

Manning Ave



0 0.25 0.5 1 Miles

-  Westlands Boundary
-  San Luis Canal
-  Noncompliant Land

**Friedenbach Family Farms
Land Stewardship
Noncompliant Land**



Westlands Water District
286 W. Cromwell Ave
Fresno, CA 93711

Date: 10/12/2026



Westlands Water District

DATE: October 20, 2026

TO: Finance and Administration Committee

THROUGH: Allison Febbo, General Manager
Stephen Farmer, Chief Administrative Officer

FROM: Sherman Dix, Deputy General Manager - Finance and Administration
Katarina Campbell, Deputy General Manager - Resources

SUBJECT: Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Request for Waiver of Authorized General Manager Actions Under Article 1 Section 1.9B and Article 2 Sections 2.6G and 2.6H – Cantua Creek Vineyards I, II, III & IV LLC

DISCUSSION:

The purpose of this agenda item is for the Finance & Administration Committee to consider a request for a waiver of the District's Rules & Regulations submitted by Damon Franzia on behalf of Cantua Creek Vineyards I, II, III & IV LLC.

Policy Background

On July 21, 2026, the Board of Directors adopted amendments to the District's Rules and Regulations requiring water users to engage in "proper land stewardship" to maximize the reasonable and beneficial use of water within the District. "Proper land stewardship" means:

Water user implementation of land management best practices that are customary for similarly situated water users within the District and that are intended to minimize infestations, outbreaks or spread of weeds, pests and disease that are harmful to growing crops and fire that threatens crops and irrigation and water delivery infrastructure. It shall be improper to abandon a crop in a manner or for a duration that would permit it to become a source of any of the aforementioned conditions.

Per Article 2.4(F) of the District's Rules and Regulations, Proper Land Stewardship requires that "no water will be allocated to eligible cropland if, after providing notice and a 30-day opportunity to cure, the water user fails to cease the conduct inconsistent with Proper Land Stewardship, cure the identified issues and engage in Proper Land Stewardship." Further, per Article 2.6(G), failure to engage in Proper Land Stewardship shall "constitute a per se waste of water authorizing General Manager to remediate at the water user's cost, after oral or written notice to the water user and a 30-day opportunity to cure." These revisions were noticed in the July 24, 2026, monthly grower notice.

Timeline of Events

On August 10, 2026, Westlands Water District (District) staff identified multiple parcels owned or operated by Cantua Creek Vineyards I, II, III & IV LLC as noncompliant with the

ITEM 5

District's Rules and Regulations requiring Proper Land Stewardship. APNs 040 100 12S, 040 100 21S, 040 100 36S, 040 100 37S, 040 100 38S, 040 100 39S, 038 231 13S, 038 231 14, 038 231 15S, 038 231 17, 038 231 43S, 038 160 33S, and 038 150 21 (3,350.75 acres total) had been found to contain an abandoned crop (grapes) which poses a risk for fire and could harbor crop-damaging pests, increasing the risk of fire and pest infestations that could impact District water delivery infrastructure and increase water use.

District staff issued a Notice of Violation (NOV) in accordance with District Rules and Regulations under both Article 1 and Article 2 on September 3, 2026. The NOV included a 30-day opportunity to cure the violation before further action would be taken, including assessing civil penalties. The cure period ended on October 3, 2026.

On September 25, 2026, District staff received a formal waiver request via email from Mr. Damon Franzia requesting an extension of the 30-day cure period, to an undetermined date. Mr. Franzia disputed that the parcels were in violation of the District's Proper Land Stewardship requirements and did not identify a specific plan or schedule for completing the necessary mitigation work. Mr. Franzia stated that, although the Notice of Violation was dated September 3, 2026, it was not received at his office and did not come across his desk until September 23, 2026. He further stated that the properties are subject to a solar option agreement with IPX/Intersect, which had previously approved and reimbursed the property owner for discing. According to Mr. Franzia, following a change in management, IPX/Intersect is now disputing its responsibility for that work.

Staff recommends denial of the waiver request as the poor conditions of the identified parcels pose a risk for fire and create a harbor for crop-damaging pests, which could impact District infrastructure and increase water demand. Cantua Creek Vineyards I, II, III & IV LLC has not communicated that they have taken any mitigating actions to date to prevent impacts to neighboring lands.

If the waiver request is denied, the General Manager is authorized to take the following actions per Article 1, Section 1.9B, and Article 2, Sections 2.6G and 2.6H:

- 1) "Freezing" the water user account.
- 2) Locking the delivery facilities, including water meters and groundwater wells that serve the parcels listed in the account.
- 3) Suspending the ability to receive allocations of water (surface and groundwater) or transfer water to or from the account.
- 4) Remediating the violation at the water user's cost if deemed necessary by the General Manager. These charges, if left unpaid, would result in further consequences per the District's Rules and Regulations and terms and conditions of water service.

PROPOSED MOTION:

Move to deny the request for waiver of District Rules and Regulations submitted by Damon Franzia on behalf of Cantua Creek Vineyards I, II, III & IV LLC.

RECOMMENDATION:

Approve the proposed motion.

ATTACHMENTS:

1. Waiver Request by Damon Franzia dated September 25, 2026

ITEM 5

2. Notice of Violation issued to Cantua Creek Vineyards I, II, III & IV LLC on September 3, 2026
3. Vicinity Map of Noncompliant Land

ATTACHMENT 1

From: Damon Franzia <Damon.Franzia@carrarafo.com>

Sent: Friday, September 25, 2026 2:08 PM

To: Brent Dragomanovich <bdragomanovich@wwd.ca.gov>

Cc: Peter Maraccini <pmaraccini@wwd.ca.gov>; Victor Ochoa <victor.ochoa@wcagsi.com>

Subject: Re: Notice of Violation - Noncompliance with Proper Land Stewardship Requirements - Westland's Water District

Brent,

I'm not sure how much latitude is available.
is available or not. Thanks.

Damon

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From: Brent Dragomanovich <bdragomanovich@wwd.ca.gov>

Sent: Friday, 25 September 2026 14:01:16

To: Damon Franzia <Damon.Franzia@carrarafo.com>

Cc: Peter Maraccini <pmaraccini@wwd.ca.gov>; Victor Ochoa <victor.ochoa@wcagsi.com>

Subject: RE: Notice of Violation - Noncompliance with Proper Land Stewardship Requirements - Westland's Water District

Damon,

Thanks for this detail, it is very helpful. To confirm, are you requesting an extension of the 30-day cure period, and if so, to what date?

Thank you,

Brent Dragomanovich

Associate Resources Analyst

P.O. Box 5199

Fresno, CA 93755

559-241-6245 office

wwd.ca.gov

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ATTACHMENT 1 continued

From: Damon Franzia <Damon.Franzia@carrarafo.com>

Sent: Friday, September 25, 2026 11:39 AM

To: Brent Dragomanovich <bdragomanovich@wwd.ca.gov>

Cc: Peter Maraccini <pmaraccini@wwd.ca.gov>; Victor Ochoa <victor.ochoa@wcagsi.com>

Subject: Re: Notice of Violation - Noncompliance with Proper Land Stewardship Requirements - Westland's Water District

Brent,

Of course.

First, the letter is dated September 3rd. It was not received at our office and didn't come across my desk until Wednesday, September 23rd, 20 days later within a 30-day window.

Secondly, we are under a solar option contract with IPX/Intersect for all our Cantua Creek properties. They had been approving and reimbursing us for discing of the properties. They have a new management group in place, so they are now challenging that they are responsible for the activity. I have shared with them the notices and encouraged them to be proactive and spend the money to remove the vineyards, as our project (Rosenfeld) is tied into the Darden project, which is currently under construction.

Thirdly, I would dispute that we are in actual violation, as they has not been a complete abandonment of the property. I've included the language below.

Proper Land Stewardship is defined as, "implementation of land management best practices that are customary for similarly situated water users within the District and that are intended to minimize infestations, outbreaks or spread of weeds, pests and disease that are harmful to growing crops and fire that threatens crops and irrigation and water delivery infrastructure. It shall be improper to abandon a crop in a manner or for a duration that would permit ti to become a source of any of the aforementioned conditions."

The nature of the solar agreements ensure that the land is maintained to ensure that no species other issues arise that would preclude or delay the solar companies to move forward on a project. IPX/Intersect have had their different specialist on the properties from June to the present day and they have reported no issues.

Please let me know if you need anything else. Thank you.

Damon



DAMON J. FRANZIA
LAND ASSET/REAL ESTATE
MANAGEMENT

E: damon.franzia@carrarafo.com

C: 949.500.3239

CARRARAFO.COM



Westlands Water District

September 3, 2026

Mr. Brian Franzia
Cantua Creek Vineyards I,II,III,IV LLC, Accounts # [REDACTED]
P.O. Box 789
Ceres, CA 95307

Subject: Noncompliance with Proper Land Stewardship Requirements (INC-00016-28)

Dear Mr. Franzia:

On August 10, 2026, Westlands Water District (District) staff identified several of your parcels to be noncompliant with the District's Rules and Regulations requiring Proper Land Stewardship. APNs 040 100 12S, 040 100 21S, 040 100 36S, 040 100 37S, 040 100 38S, 040 100 39S, 038 231 13S, 038 231 14, 038 231 15S, 038 231 17, 038 231 43S, 038 160 33S, and 038 150 21 have been found to contain abandoned crops which create a harbor for crop-damaging pests. Photo documentation of the noncompliance with Proper Land Stewardship Requirements is provided in Exhibit A.

Proper Land Stewardship is defined as, "implementation of land management best practices that are customary for similarly situated water users within the District and that are intended to minimize infestations, outbreaks or spread of weeds, pests and disease that are harmful to growing crops and fire that threatens crops and irrigation and water delivery infrastructure. It shall be improper to abandon a crop in a manner or for a duration that would permit it to become a source of any of the aforementioned conditions." The District, under its authority as a California Water District and as the Groundwater Sustainability Agency for the Westside Subbasin, requires land maintenance as a condition of water service and groundwater use to maximize the reasonable and beneficial use of water and avoid waste.

Please cure the violation within 30 days of the date of this letter by removing the dead/dying grapevines and weeds from the parcels listed, including those weeds growing up through the grapevines. If not addressed within this timeframe, the District will discontinue water service by "freezing" the water account with an uncured violation and locking the meters that serve the parcels listed in the account. The account will be unable to receive allocations of water (surface and groundwater) and previously allocated water will not be permitted to be transferred. Additionally, the General Manager is authorized to remediate the violation at the water user's cost if the water user does not cure the violation

within 30 days. These charges, if left unpaid, would result in further consequences per the District's Rules and Regulations¹ and terms and conditions of water service.²

If you have any questions regarding this matter, please contact Brent Dragomanovich at (559) 241-6245 or bdragomanovich@wwd.ca.gov. Thank you for your prompt attention to this matter.

Sincerely,



Stephen Farmer
Chief Administrative Officer

Attachment – Exhibit A

¹ <https://wwd.ca.gov/about-westlands/rules-and-regulations/>

² <https://wwd.ca.gov/wp-content/uploads/2025/01/wwd116a.pdf>

EXHIBIT A



Figure 1. APN 038 160 33S (Cantua Creek Vineyards IV LLC), photographed from the northeastern corner along S San Mateo Ave (INC-0027).



Figure 2. APN 040 100 37S (Cantua Creek Vineyards II LLC) photographed from the southwestern corner along W Clarkson Ave, facing north (INC-0019).



Figure 3. APN 040 100 38S (Cantua Creek Vineyards II LLC) photographed from the north side of S Amador Ave, facing south (INC-0020).



Figure 4. APN 038 150 21, photographed from the southern boundary looking north (INC-0028).



Figure 5. APN 038 231 43S, photographed from the southern boundary, looking north (INC-0026).



Figure 6. APN 038 231 13S, photographed from the southwestern corner, looking north (INC-0022).



Figure 7. APN 038 231 14, photographed from the southern boundary along W Clarkson Ave, looking north (INC-0023).



Figure 8. APN 038 231 15S, photographed from the southern boundary, looking north (INC-0024).



Figure 9. APN 038 231 17, photographed from the northern boundary along W Clarkson Ave, looking south (INC-0025).



Figure 10. APN 040 100 12S, photographed from the southern boundary looking north (INC-0016).



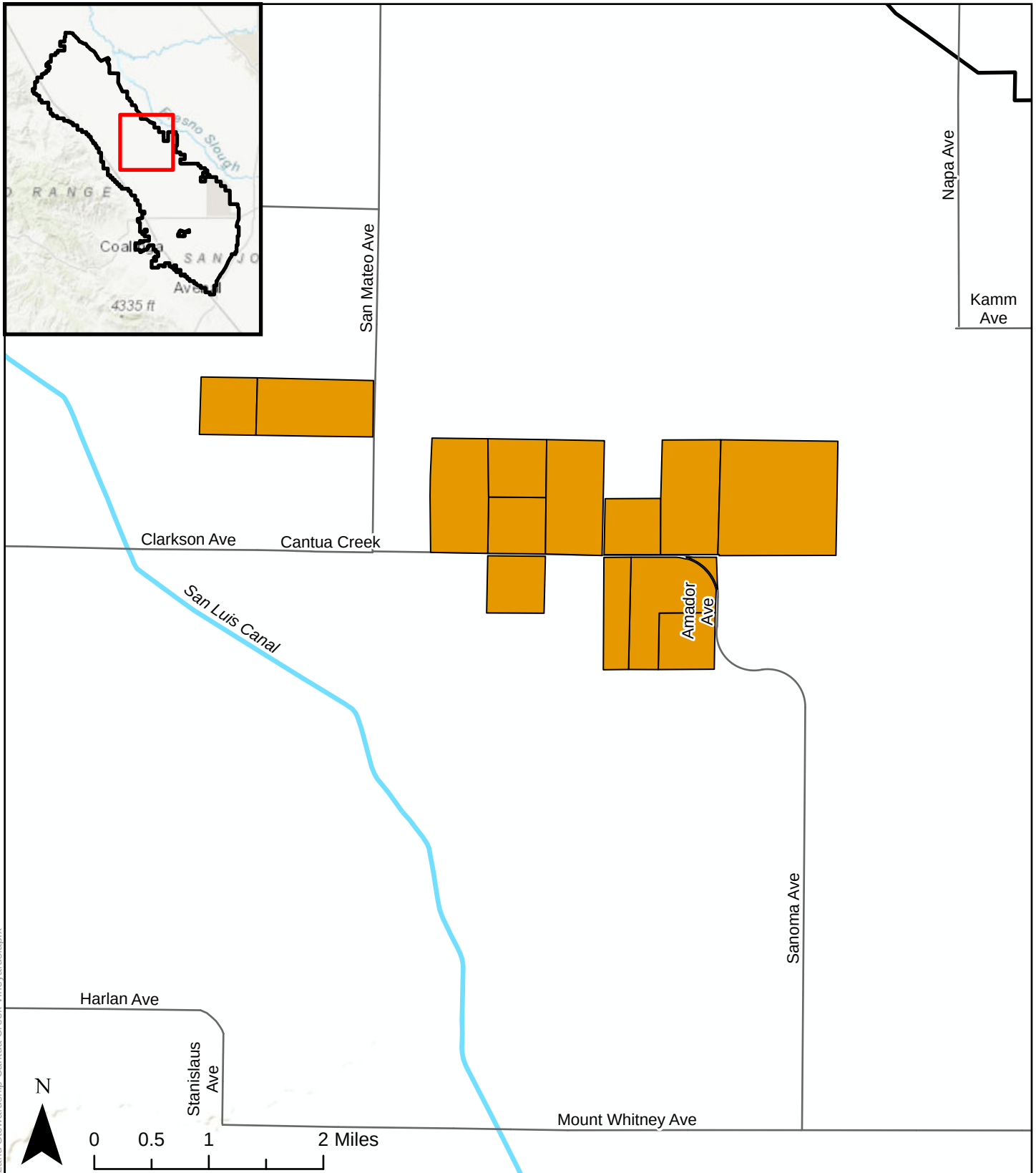
Figure 11. APN 040 100 21S, photographed from the southern boundary looking north (INC-0017).



Figure 12. APN 040 100 36S, photographed from the southern boundary looking north (INC-0018).



Figure 13. APN 040 100 39S, photographed from the southern boundary looking north (INC-0021).



0 0.5 1 2 Miles

-  Westlands Boundary
-  San Luis Canal
-  Noncompliant Land

Cantua Creek Vineyards I, II, III, & IV Land Stewardship Noncompliant Land



Westlands Water District
286 W. Cromwell Ave
Fresno, CA 93711

Date: 10/12/2026



Westlands Water District

DATE: October 20, 2026

TO: Finance and Administration Committee

THROUGH: Allison Febbo, General Manager
Stephen Farmer, Chief Administrative Officer

FROM: Sherman Dix, Deputy General Manager - Finance and Administration
Katarina Campbell, Deputy General Manager - Resources

SUBJECT: Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Request for Waiver of Authorized General Manager Actions Under Article 1 Section 1.9B and Article 2 Sections 2.6G and 2.6H – ACDF LLC

DISCUSSION:

The purpose of this agenda item is for the Finance & Administration Committee to consider a request for a waiver of the District's Rules & Regulations submitted by Lindsay Cederquist on behalf of ACDF LLC.

Policy Background

On July 21, 2026, the Board of Directors adopted amendments to the District's Rules and Regulations requiring water users to engage in "proper land stewardship" to maximize the reasonable and beneficial use of water within the District. "Proper land stewardship" means:

Water user implementation of land management best practices that are customary for similarly situated water users within the District and that are intended to minimize infestations, outbreaks or spread of weeds, pests and disease that are harmful to growing crops and fire that threatens crops and irrigation and water delivery infrastructure. It shall be improper to abandon a crop in a manner or for a duration that would permit it to become a source of any of the aforementioned conditions.

Per Article 2.4(F) of the District's Rules and Regulations, Proper Land Stewardship requires that "no water will be allocated to eligible cropland if, after providing notice and a 30-day opportunity to cure, the water user fails to cease the conduct inconsistent with Proper Land Stewardship, cure the identified issues and engage in Proper Land Stewardship." Further, per Article 2.6(G), failure to engage in Proper Land Stewardship shall "constitute a per se waste of water authorizing General Manager to remediate at the water user's cost, after oral or written notice to the water user and a 30-day opportunity to cure." These revisions were noticed in the July 24, 2026, monthly grower notice.

Timeline of Events

On August 25, 2026, Westlands Water District (District) staff identified a parcel owned or operated by ACDF LLC as noncompliant with the District's Rules and Regulations requiring Proper Land Stewardship. APN 038 090 37S (310.63 acres) had been found to

ITEM 6

contain an abandoned crop (almonds) which could pose a fire risk and harbor crop-damaging pests, increasing the risk of fire and pest infestations that could impact District water delivery infrastructure and increase water use.

District staff issued a Notice of Violation (NOV) in accordance with District Rules and Regulations under both Article 1 and Article 2 on August 28, 2026. The NOV included a 30-day opportunity to cure the violation before further action would be taken, including assessing civil penalties. The letter was sent via certified mail on September 1, 2026; therefore, the cure period ended on October 1, 2026.

On September 18, 2026, District staff received a formal waiver request via email from Ms. Lindsay Cederquist requesting an extension of the 30-day cure period to January 15, 2027. Ms. Cederquist indicated that the parcel is part of a pending sales transaction and that the necessary mitigation work would take place after that date.

Staff recommends denial of the waiver request as the poor conditions of the identified parcels pose a risk for fire and create a harbor for crop-damaging pests, which could impact District infrastructure and increase water demand. ACDF LLC has not communicated that they have taken any mitigating actions to date to prevent impacts to neighboring lands.

If the waiver request is denied, the General Manager is authorized to take the following actions per Article 1, Section 1.9B, and Article 2, Sections 2.6G and 2.6H:

- 1) "Freezing" the water user account.
- 2) Locking the delivery facilities, including water meters and groundwater wells that serve the parcels listed in the account.
- 3) Suspending the ability to receive allocations of water (surface and groundwater) or transfer water to or from the account.
- 4) Remediating the violation at the water user's cost if deemed necessary by the General Manager. These charges, if left unpaid, would result in further consequences per the District's Rules and Regulations and terms and conditions of water service.

PROPOSED MOTION:

Move to deny the request for waiver of District Rules and Regulations submitted by Lindsay Cederquist on behalf of ACDF LLC.

RECOMMENDATION:

Approve the proposed motion.

ATTACHMENTS:

1. Waiver Request by Lindsay Cederquist dated September 18, 2026
2. Notice of Violation issued to ACDF LLC on August 28, 2026
3. Vicinity Map of Noncompliant Land

ATTACHMENT 1

To: Katarina Campbell
Subject: RE: Request for Extension- Land Stewardship

From: Lindsay Cederquist <lcederquist@DiversifiedLand.com>
Sent: Friday, September 18, 2026 10:50 AM
To: Stephen Farmer <sfarmer@wwd.ca.gov>
Cc: Matt Covington <matt.covington@pivotgrp.com>; eric@asgardenterprisesinc.com; Clay Beck <Cbeck@DiversifiedLand.com>
Subject: Request for Extension- Land Stewardship

Mr. Farmer,

I am writing regarding the August 28, 2026, notice of noncompliance for APN 038-090-37S.

Due to a pending transaction involving the property, we will not be able to complete the necessary field work within the 30-day timeframe. We are requesting an extension through **January 15, 2027**, to allow the transaction to be completed and the land stewardship requirements to be addressed shortly thereafter.

We understand the District's concerns and intend to ensure the parcel is brought into compliance. Please let me know if the District can accommodate this extension or if any additional information is needed.

Thank you for your consideration.

Lindsay

Lindsay Cederquist | Director of Water Resources

Diversified Land Management, LLC
Web: www.DiversifiedLand.com
Email: lcederquist@diversifiedland.com
Address: PO Box 995 Selma, CA 93662
Cell: (559) 706-7735



Let's Link Up!

[Facebook](#) | [Instagram](#) | [LinkedIn](#)



Westlands Water District

August 28, 2026

Ms. Lindsay Cederquist
ACDF LLC, Account # [REDACTED]
204 N 12th Avenue Suite 109 #338
Hanford, CA 93230

Subject: Noncompliance with Proper Land Stewardship Requirements (INC-0007)

Dear Ms. Cederquist:

On August 25, 2026, Westlands Water District (District) staff identified one of your parcels to be noncompliant with the District's Rules and Regulations requiring Proper Land Stewardship. APN 038 090 37S has been found to contain an abandoned almond crop which creates a harbor for crop-damaging pests and poses a fire risk. Photo documentation of the noncompliance with Proper Land Stewardship Requirements is provided in Exhibit A.

Proper Land Stewardship is defined as, "implementation of land management best practices that are customary for similarly situated water users within the District and that are intended to minimize infestations, outbreaks or spread of weeds, pests and disease that are harmful to growing crops and fire that threatens crops and irrigation and water delivery infrastructure. It shall be improper to abandon a crop in a manner or for a duration that would permit it to become a source of any of the aforementioned conditions." The District, under its authority as a California Water District and as the Groundwater Sustainability Agency for the Westside Subbasin, requires land maintenance as a condition of water service and groundwater use to maximize the reasonable and beneficial use of water and avoid waste.

Please cure the violation within 30 days of the date of this letter by removing the abandoned crop and disking the field to remove the weeds. If not addressed within this timeframe, the District will discontinue water service by "freezing" the water account with an uncured violation and locking the meters that serve the parcels listed in the account. The account will be unable to receive allocations of water (surface and groundwater) and previously allocated water will not be permitted to be transferred. Additionally, the General Manager is authorized to remediate the violation at the water user's cost if the water user does not cure the violation within 30 days. These charges, if left unpaid, would result in

Ms. Lindsay Cederquist
August 28, 2026
Page 2

Westlands Water District

further consequences per the District's Rules and Regulations¹ and terms and conditions of water service.²

If you have any questions regarding this matter, please contact Brent Dragomanovich at (559) 241-6245 or bdragomanovich@wwd.ca.gov. Thank you for your prompt attention to this matter.

Sincerely,



Stephen Farmer
Chief Administrative Officer

Attachment – Exhibit A

¹ <https://wwd.ca.gov/about-westlands/rules-and-regulations/>

² <https://wwd.ca.gov/wp-content/uploads/2025/01/wwd116a.pdf>

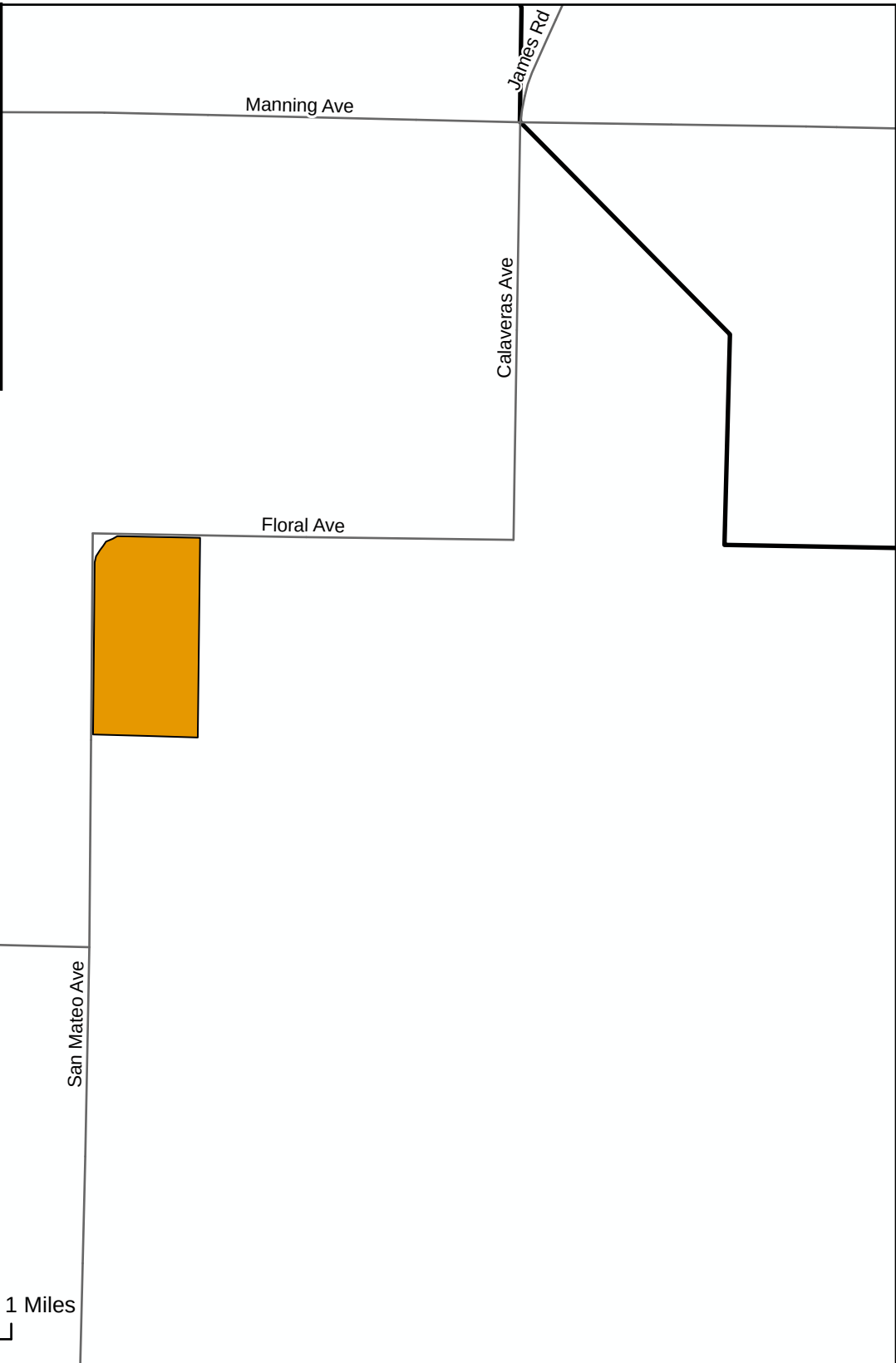
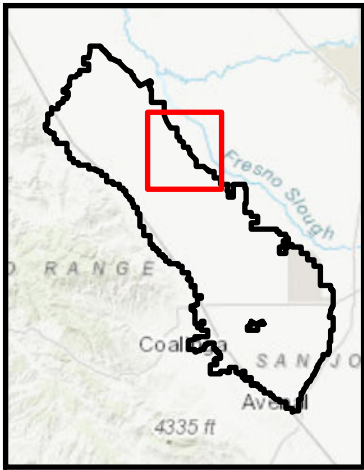
EXHIBIT A



Figure 1. APN 038 090 37S, photographed from the northwestern corner along S San Mateo Avenue, facing south.



Figure 2. APN 038 090 37S, photographed from the southwestern corner along S San Mateo Avenue, facing north.



0 0.25 0.5 1 Miles

-  Westlands Boundary
-  Noncompliant Land

**ACDF
Land Stewardship
Noncompliant Land**



Westlands Water District
286 W. Cromwell Ave
Fresno, CA 93711



Westlands Water District

DATE: October 20, 2026

TO: Finance and Administration Committee

THROUGH: Allison Febbo, General Manager
Stephen Farmer, Chief Administrative Officer

FROM: Sherman Dix, Deputy General Manager - Finance and Administration
Katarina Campbell, Deputy General Manager - Resources

SUBJECT: Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Request for Waiver of Authorized General Manager Actions Under Article 1 Section 1.9B and Article 2 Sections 2.6G and 2.6H – Tafazoli Yazdi/Abazari Revocable Trust

DISCUSSION:

The purpose of this agenda item is for the Finance & Administration Committee to consider a request for a waiver of the District's Rules & Regulations submitted by Amir Yazdi on behalf of Tafazoli Yazdi/Abazari Revocable Trust.

Policy Background

On July 21, 2026, the Board of Directors adopted amendments to the District's Rules and Regulations requiring water users to engage in "proper land stewardship" to maximize the reasonable and beneficial use of water within the District. "Proper land stewardship" means:

Water user implementation of land management best practices that are customary for similarly situated water users within the District and that are intended to minimize infestations, outbreaks or spread of weeds, pests and disease that are harmful to growing crops and fire that threatens crops and irrigation and water delivery infrastructure. It shall be improper to abandon a crop in a manner or for a duration that would permit it to become a source of any of the aforementioned conditions.

Per Article 2.4(F) of the District's Rules and Regulations, Proper Land Stewardship requires that "no water will be allocated to eligible cropland if, after providing notice and a 30-day opportunity to cure, the water user fails to cease the conduct inconsistent with Proper Land Stewardship, cure the identified issues and engage in Proper Land Stewardship." Further, per Article 2.6(G), failure to engage in Proper Land Stewardship shall "constitute a per se waste of water authorizing General Manager to remediate at the water user's cost, after oral or written notice to the water user and a 30-day opportunity to cure." These revisions were noticed in the July 24, 2026, monthly grower notice.

Timeline of Events

On September 15, 2026, Westlands Water District (District) staff identified a parcel owned or operated by Tafazoli Yazdi/Abazari Revocable Trust as noncompliant with the District's

ITEM 7

Rules and Regulations requiring Proper Land Stewardship. APN 060 150 85S (85 acres) had been found to contain an abandoned crop (grapes) which could pose a fire risk and harbor crop-damaging pests, increasing the risk of fire and pest infestations that could impact District water delivery infrastructure and increase water use.

District staff issued a Notice of Violation (NOV) in accordance with District Rules and Regulations under both Article 1 and Article 2 on September 21, 2026. The NOV included a 30-day opportunity to cure the violation before further action would be taken, including assessing civil penalties. The cure period ended on October 21, 2026.

On September 29, 2026, District staff received a formal waiver request via email from Mr. Amir Yazdi requesting an extension of the 30-day cure period to December 31, 2026. Mr. Yazdi indicated that the parcel was recently purchased in July of 2026 and that the years of non-irrigation have made removing the vines difficult. Mr. Yazdi believes that rainfall prior to the end of the year will make removal more practical.

Staff recommends denial of the waiver request because the condition of the identified parcels pose a risk for fire and create a harbor for crop-damaging pests, which could impact District infrastructure and increase water demand. Tafazoli Yazdi/Abazari Revocable Trust has not communicated that they have taken any mitigating actions to date to prevent impacts to neighboring lands.

If the waiver request is denied, the General Manager is authorized to take the following actions per Article 1, Section 1.9B, and Article 2, Sections 2.6G and 2.6H:

- 1) "Freezing" the water user account.
- 2) Locking the delivery facilities, including water meters and groundwater wells that serve the parcels listed in the account.
- 3) Suspending the ability to receive allocations of water (surface and groundwater) or transfer water to or from the account.
- 4) Remediating the violation at the water user's cost if deemed necessary by the General Manager. These charges, if left unpaid, would result in further consequences per the District's Rules and Regulations and terms and conditions of water service.

PROPOSED MOTION:

Move to deny the request for waiver of District Rules and Regulations submitted by Amir Yazdi on behalf of Tafazoli Yazdi/Abazari Revocable Trust.

RECOMMENDATION:

Approve the proposed motion.

ATTACHMENTS:

1. Waiver Request by Amir Yazdi dated September 29, 2026
2. Notice of Violation issued to Tafazoli Yazdi/Abazari Revocable Trust on September 21, 2026
3. Vicinity Map of Noncompliant Land

From: [Westfield Farm](#)
To: [Brent Dragomanovich](#)
Cc: [Valdemar Cerna](#)
Subject: Re: Noncompliance with Proper Land Stewardship Requirements (INC-00070)
Date: Tuesday, September 29, 2026 7:35:45 PM

Hi,

We purchased this property on July 22, 2026, and were surprised to receive this noncompliance notice so soon after taking ownership.

The condition identified in your letter existed well before our purchase. During the approximately 12 months that we were involved in the purchase transaction, the grapevines appeared substantially the same as they do today. To our knowledge, these vines had not been irrigated for at least two years prior to our acquisition of the property. Therefore, we were surprised that this issue was not addressed with the previous owner before the property was transferred to us.

Nevertheless, we understand the District's concern and intend to take care of the abandoned vines and bring the property into compliance.

Because the vines have been without water for such a long period, the ground is extremely dry and hard, making removal at this time difficult. We would prefer to wait until we receive meaningful rainfall, hopefully in November, which should make the removal and disking significantly more practical.

Accordingly, we respectfully request that the District extend the compliance deadline through **December 31, 2026**. Our intention is to remove the abandoned vines and complete the necessary field work before the end of the year.

We appreciate your consideration and would appreciate written confirmation that the extension has been approved.

Amir Yazdi

Westfield Farm LLC
2618 San Miguel Drive #408
Newport Beach, CA 92660
Tel: 559-474-8724
Cel: 949-266-4738

On Sep 24, 2026, at 4:24 PM, Brent Dragomanovich
<bdragomanovich@wwd.ca.gov> wrote:

Good afternoon Mr. Yazdi,

Please see attached noncompliance letter from Westlands Water District (WWD) regarding an abandoned grape vineyard on your property (APN 060 150 85S). Please

confirm receipt and advise as to when this issue will be addressed.

Thank you,

Brent Dragomanovich

Associate Resources Analyst

P.O. Box 5199

Fresno, CA 93755

559-241-6245 office

wwd.ca.gov

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<Land Stewardship_Noncompliance Letter_TAFAZOLI YAZDIABAZARI REV
TR_Final.pdf>



Westlands Water District

September 21, 2026

Mr. Amir Yazdi
Tafazoli Yazdi/Abazari Revocable Trust, Account [REDACTED]
2618 San Miguel Dr #408
Newport Beach, CA 92660

Subject: Noncompliance with Proper Land Stewardship Requirements (INC-00070)

Dear Mr. Yazdi:

On September 15, 2026, Westlands Water District (District) staff identified one of your parcels to be noncompliant with the District's Rules and Regulations requiring Proper Land Stewardship. APN 060 150 85S has been found to contain an abandoned grape crop which creates a harbor for crop-damaging pests and poses a fire risk. Photo documentation of the noncompliance with Proper Land Stewardship Requirements is provided in Exhibit A.

Proper Land Stewardship is defined as, "implementation of land management best practices that are customary for similarly situated water users within the District and that are intended to minimize infestations, outbreaks or spread of weeds, pests and disease that are harmful to growing crops and fire that threatens crops and irrigation and water delivery infrastructure. It shall be improper to abandon a crop in a manner or for a duration that would permit it to become a source of any of the aforementioned conditions." The District, under its authority as a California Water District and as the Groundwater Sustainability Agency for the Westside Subbasin, requires land maintenance as a condition of water service and groundwater use to maximize the reasonable and beneficial use of water and avoid waste.

Please cure the violation within 30 days of the date of this letter by removing the abandoned crop and disking the field to remove the weeds. If not addressed within this timeframe, the District will discontinue water service by "freezing" the water account with an uncured violation and locking the meters that serve the parcels listed in the account. The account will be unable to receive allocations of water (surface and groundwater) and previously allocated water will not be permitted to be transferred. Additionally, the General Manager is authorized to remediate the violation at the water user's cost if the water user does not cure the violation within 30 days. These charges, if left unpaid, would result in

further consequences per the District's Rules and Regulations¹ and terms and conditions of water service.²

If you have any questions regarding this matter, please contact Brent Dragomanovich at (559) 241-6245 or bdragomanovich@wwd.ca.gov. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Farmer", written over the printed name.

Stephen Farmer
Chief Administrative Officer

Attachment – Exhibit A

¹ <https://wwd.ca.gov/about-westlands/rules-and-regulations/>

² <https://wwd.ca.gov/wp-content/uploads/2025/01/wwd116a.pdf>

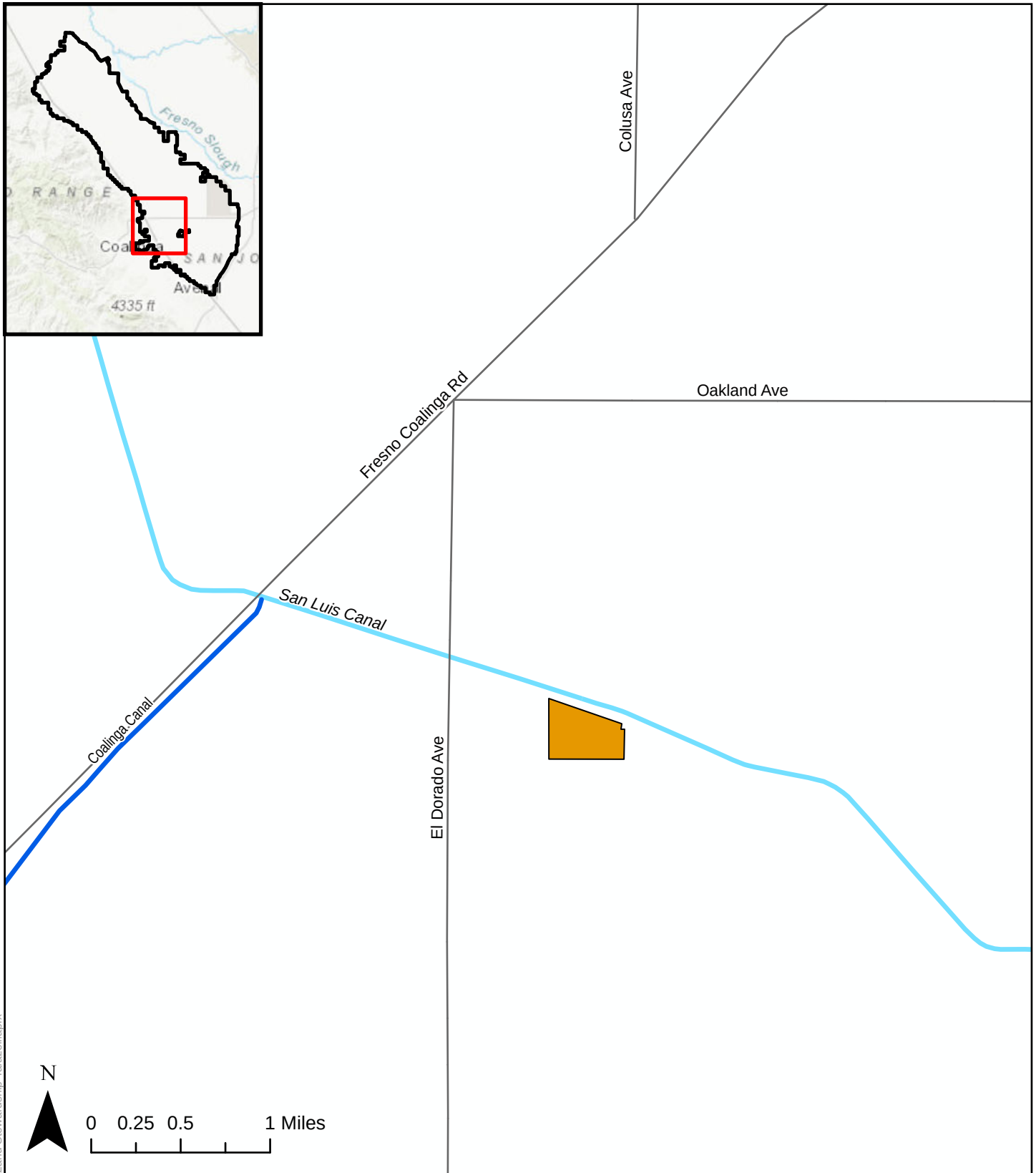
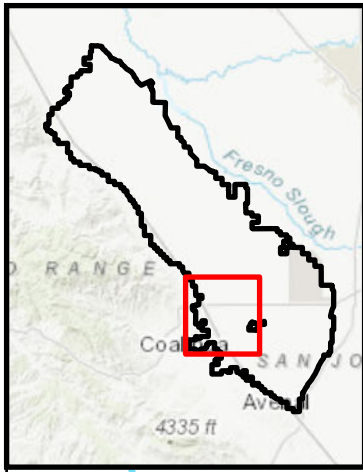
EXHIBIT A



Figure 1. APN 060 150 85S, photographed from the northern boundary, facing south.



Figure 2. APN 060 150 85S, photographed from the southern boundary along W Ford Ave, facing north.



-  Westlands Boundary
-  Noncompliant Land

-  San Luis Canal
-  Coalinga Canal

**Tafazoli Yazdi/Abazari Revocable Trust
Land Stewardship
Noncompliant Land**



Westlands Water District
286 W. Cromwell Ave
Fresno, CA 93711



Westlands Water District

DATE: October 20, 2026

TO: Finance and Administration Committee

THROUGH: Allison Febbo, General Manager
Stephen Farmer, Chief Administrative Officer

FROM: Katarina Campbell, Deputy General Manager - Resources

SUBJECT: Consider Recommending Board Adopt a Policy for the Transfer of Water Out of the District

STRATEGIC PLAN KEY STRATEGIES:

1. Protect Central Valley Project (CVP) Contract and Secure Supplemental Water Supplies
2. Enhance Groundwater Resources

DISCUSSION:

The purpose of this item is for the Finance and Administration Committee to consider recommending that the Board of Directors (Board) adopt the Policy for the Transfer of Water Out of the District (Policy). The Board requested that staff develop a Policy for the Transfer of Water Out of the District in 2025. Additionally, Strategies 1 and 2 of the Strategic Plan emphasize the importance of improving surface water and groundwater management to ensure the District's water supplies are managed sustainably and optimize flexibility for Water Users.

The proposed Policy establishes the guidelines and conditions under which a Water User may request the Board to consider a transfer of water outside the District. Transfers are only permitted when District water supplies are at risk of loss due to Reclamation's policies, the transfer will not increase groundwater pumping in the Westside Subbasin, and the transfer generally benefits a related "farming" entity in a receiving district.

More specifically, a Transfer Out may only be considered when at least one of the following sub criteria is satisfied:

1. There is a risk of loss of water in San Luis Reservoir (SLR) due to USBR rescheduling limitations (Cap Loss or Rescheduling Loss as described in Article 2.10); or
2. There is a surplus of surface water available for the Transfer Out due to an acquired long-term supply that is assigned to or was transferred into the District for at least the prior 5 years; or
3. The Supplemental Water Program is undersubscribed, and the water is not storable in SLR.

Groundwater banking transfers are excluded from this Policy and governed by Policy No. 12, the Board's delegation of authority to the General Manager to approve transfers under certain conditions, which applies to Transfers Out that support water banking programs, with an obligation to return water in a subsequent year via an exchange.

Consistent with historic practice, all non-banking transfer requests under this Policy will continue to be subject to review and approval by the Board.

PROPOSED MOTION:

Move that the Committee recommends that the Board of Directors adopt the Policy for the Transfer of Water Out of the District.

RECOMMENDATION:

Approve the proposed motion.

Attachment

-
1. Westlands Water District Policy for the Transfer of Water Out of the District

**APPENDIX B
DRAFT
Westlands Water District
Policy for the Transfer of Water Out of the District
Board Policy No. ##**

I. PURPOSE

Westlands Water District (District) Policy for the Transfer of Water Out of the District (Policy) establishes guidelines for staff to consider when evaluating requests for water transfers out of the District submitted by Water Users under Article 2.6(A). This Policy ensures that transfers out of the District (Transfer Out) may only be considered when at least one of the following criteria is satisfied: (1) a risk of loss due to the United States Bureau of Reclamation (USBR) rescheduling limitations (Cap Loss or Rescheduling Loss); (2) surplus long-term water supply; (3) or unsubscribed non-storage Supplemental Water. The Policy seeks to optimize the District's water supplies and flexible water management, while protecting the interests of all District Water Users.

II. POLICY

All Transfer Out requests must be initiated by a District Water User, benefit a related transferee in the receiving district, not increase groundwater pumping in the Westside Subbasin, and be subject to District Board of Director approval as provided below.

Groundwater Banking Transfers are governed by Policy No. 12, which applies to Transfers Out with an obligation to return water in a subsequent year via an exchange. See Policy No. 12 for more information.

All Transfer Out requests (other than those governed by Policy No. 12) are permitted only when the Board of Directors makes all the following findings:

1. The Transfer Out request meets at least one of the following sub criteria and 2 through 4:
 - a. There is a risk of loss of water in San Luis Reservoir (SLR) due to USBR rescheduling limitations (Cap Loss or Rescheduling Loss as described in Article 2.10); or
 - b. There is a surplus of surface water available for the Transfer Out due to an acquired long-term supply that is assigned to or was transferred into the District for at least the prior 5 years; or
 - c. The Supplemental Water Program is undersubscribed and the water is not storable in SLR.

2. Water User agrees with enforceable commitments to not pump groundwater from any of their accounts for the balance of the Contract Water Year
3. The Transfer Out request includes an official statement from the requesting District Water User confirming finding number 2 requirements; and
4. The Transfer Out benefits the requesting Water User's related entity(ies).
5. Water User has satisfied all the requirements of this Policy, including attempting to transfer water internal to the District before it permits a Transfer Out.
6. The Transfer Out will not impair the District's interest in recharging water, or the Subbasin's recharge needs are otherwise satisfied.

III. Water Transfer Out Request Procedure

1. The requesting Water User shall post the proposed Transfer Out water on the District's Water User Portal for 30 days, either for the exchange of equivalent groundwater credits or for purchase at the current year's Supplemental Water rate, prior to submission of a Transfer Out request to the District.
2. The requesting Water User must submit a written request 30 days in advance of the requested Transfer Out date to the District and provide:
 - a. All necessary authorizations, including approvals and permits, to Transfer Out, proof of posting on Water User Portal; and
 - b. The quantity and source of water proposed for Transfer Out; and
 - c. The proposed transferee, the relationship between the transferor and transferee, and intended use; and
 - d. Commitment to pay all District rates and charges, plus any conveyance costs necessary to transport the Transfer Out; and
 - e. Commitment to not increase groundwater pumping in the Westside Subbasin; and
 - f. The Water User's accounts involved in the transfer must be in good standing.
2. The General Manager, or designee, will review the request and supporting documentation to determine if the Transfer Out meets the conditions outlined above. District staff will determine whether or not the District's water demands are satisfied and the proposed Transfer Out will mitigate the rescheduling risk criteria.
3. If the request is consistent with this Policy, applicable law, and District rules, the General Manager, or designee, will seek approval for the Transfer Out from the Board of Directors, except where the Board has already delegated approval authority to the General Manager, subject to any necessary agreements and conditions.

IV. Conditions of Approval

The District may place conditions on the approval of a requested Transfer Out, including, but not limited to, the following:

1. If the proposed Transfer Out is not included in USBR's Accelerated Water Transfer Program, the Water User must obtain all necessary authorizations from relevant federal, state, and local agencies for the Transfer Out and provide proof thereof to the District 30 days prior to the requested Transfer Out date; and
2. The transferor shall execute a Water Transfer Agreement with the District, which shall include, but is not limited to the commitment to pay all District rates and charges plus all incremental costs and fees associated with the Transfer Out, including administrative, operations, and maintenance expenses; and
3. All Transfer Out approvals are contingent upon payment of all rates and charges in advance, and compliance with the terms of the Transfer Agreement. Under no circumstances shall a Transfer Out be approved if the Water User pumps groundwater from any of their accounts for the balance of the Contract Water Year; and
4. The District shall find that the Transfer Out is acceptable because the Westside Subbasin groundwater conditions are in good condition in accordance with Article 1; and
5. The transferor shall not receive an internal transfer of surface water or pump additional groundwater from the submission date of the Transfer Out written request until the start of the next Contract Water Year.

V. Reporting

All transfers shall be documented and tracked in accordance with the District's accounting policies. A summary of approved transfers out of the District will be documented on the District's water schedule.

VI. Amendments

The Board retains discretion to amend or rescind this Policy at any time by formal action.



Westlands Water District

DATE: October 20, 2026

TO: Finance and Administration Committee

THROUGH: Allison Febbo, General Manager
Stephen Farmer, Chief Administrative Officer

FROM: Sherman Dix, Deputy General Manager - Finance and Administration

SUBJECT: Consider Other Post Employment Benefits (OPEB) Prefunding

DISCUSSION:

The District's most recent Annual Comprehensive Financial Report identified approximately \$17.9 million in net pension liability and approximately \$9.0 million in net OPEB liability. While the District has made significant progress in prefunding retiree health benefits through the California Employers' Retiree Benefit Trust (CERBT), sizable pension costs and growing OPEB obligations highlight the need for a more formal long-term funding strategy. The purpose of this item is for the Finance and Administration Committee to consider OPEB prefunding as a means of maximizing potential investment returns on funds already designated for OPEB in the budget, and to provide an update on staff's ongoing evaluation of funding strategies to address the District's OPEB and pension liabilities.

OPEB Prefunding

Staff would annually prefund budgeted OPEB costs at the beginning of each fiscal year and pay retiree medical costs from trust assets rather than directly from operating revenues.

Rationale:

Staff recommends establishing a policy that annual budgeted OPEB costs be contributed to a prefunding trust at the beginning of each fiscal year. Retiree medical benefit costs would then be paid from trust assets as they are incurred. This approach maximizes investment earnings, will reduce reliance on operating revenues to fund retiree benefits overtime, and promotes a disciplined funding strategy.

Other Updates

Additionally, Staff is evaluating whether an independent Section 115 trust structure, administered outside of CalPERS, could provide investment or financial advantages for management of the District's pension and OPEB obligations. As part of that evaluation, staff will assess the potential benefits, costs, legal considerations, and implementation requirements associated with consolidating the District's existing CERBT assets into a non-CalPERS Section 115 trust that could accommodate both OPEB and pension stabilization assets. If the evaluation demonstrates meaningful financial and

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administrative benefits to the District, staff will return to the Committee or Board with options and recommendations for further consideration.

PROPOSED MOTION:

None.

RECOMMENDATION:

Direct Staff as appropriate.

Attachment

None