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 November 17, 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: 837 5907 8735
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 October 20, 2026

4. Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Waiver of General Manager Authority Under Article 1, Sections 1.9B and 1.17.A.2, and Article 2, Sections 2.6G and 2.6H, Related to Delinquent Proper Land Stewardship Cure – Gradon Farms LLC

5. Consider Request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Waiver of General Manager Authority Under Article 1, Sections 1.9B and 1.17.A.2, and Article 2, Sections 2.6G and 2.6H, Related to Delinquent Proper Land Stewardship Cure – Solstice Energy Center, LLC

6. Consider Other Post Employment Benefits (OPEB) Prefunding

7. **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.

8. **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
October 20, 2026

A regular meeting of the Finance and Administration Committee was held on October 20, 2026, at 8:30 a.m., at the District's Fresno Office, 286 W. Cromwell Ave, 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
Katarina Campbell, Deputy General Manager, Resources
Sherman Dix, Deputy General Manager, Finance & Administration
Dalia Cano, Supervisor of Customer Accounting
Liana Leyva, Executive Assistant
Abby Castillo, Administrative Assistant

Others present:

Scott Slater, Brownstein Hyatt Farber Schreck LLP

Item 1. Call to Order

Director Diener, acting as Chair, called the meeting to order at approximately 8:31 a.m.

Item 2. Committee to Consider Modifications, Corrections or Additions to the Agenda of Items, as authorized by 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 Westlands Water District Finance and Administration Committee of March 17, 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 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

Ms. Campbell recommended that the Finance and Administration Committee deny Friedenbach Family Farms LLC's request for a waiver of land-stewardship violations involving 573.09 acres across five parcels. Staff reported that abandoned almond orchards and widespread weeds posed fire, pest, infrastructure, and water-demand risks, and that the 30-day cure period expired on September 27, 2026. Although an extension through October 28, 2026, was requested, staff reported no confirmed mitigation and recommended denial. If denied, authorized enforcement actions could include freezing the account, locking delivery facilities, suspending water allocations and transfers, and charging the landowner for necessary remediation.

Director Diener moved to deny the waiver, with a modification directing that penalties and enforcement begin immediately unless, within five business days of the meeting, by October 27, 2026, the landowner submitted (1) a signed contract to remediate the land and (2) a sufficient deposit with the District or evidence of a prepaid contract. If both were submitted, enforcement would be stayed and the landowner would have up to sixty (60) additional days from the date of the District's letter to complete the remediation work. Director Diener further specified that these terms would be implemented at staff's discretion. Director Fortune seconded the motion. No public comments were received. The Committee approved the motion, as modified, with the vote as follows:

Ayes: Fortune, Diener, Hughes
Nays: None
Absent: Bourdeau

Item 5. Committee to 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

Ms. Campbell recommended that the Finance and Administration Committee deny the waiver request from Cantua Creek Vineyards entities regarding land-stewardship violations involving abandoned grape crops on approximately 3,350.75 acres. Staff reported that the noncompliant parcels could pose increased fire and pest risks to surrounding crops and

water infrastructure and potentially affect water demand. The parcels were identified as noncompliant on August 10, 2026, and a Notice of Violation was issued on September 3, 2026, providing until October 3, 2026, to cure the violations. If the waiver is denied, authorized enforcement actions may include freezing the account, locking delivery facilities, suspending water allocations or transfers, and remediating the violations at the water user's expense.

Director Fortune moved to deny the waiver, with a modification directing that penalties and enforcement begin immediately unless, within five business days of the meeting, by October 27, 2026, the landowner submitted (1) a signed contract to remediate the land and (2) a sufficient deposit with the District or evidence of a prepaid contract. If both were submitted, enforcement would be stayed and the landowner would have up to sixty (60) additional days from the date of the District's letter to complete the remediation work. At Director Diener's request, the motion further provided that these terms would be implemented at staff's discretion. Director Hughes seconded the motion. Mr. Franzia expressed his disagreement with the Committee's decision and voiced his concerns. The Committee approved the motion, as modified, with the vote as follows:

Ayes: Fortune, Diener, Hughes
Nays: None
Absent: Bourdeau

Item 6. Committee to 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

Ms. Campbell recommended that the Finance and Administration Committee deny ACDF LLC's waiver request regarding land-stewardship violations involving abandoned almond trees on approximately 310.63 acres. Staff reported that the parcel posed unresolved fire and pest risks and that the 30-day cure period expired on October 1, 2026. ACDF LLC requested an extension through January 15, 2027, citing a pending sale; however, staff reported that no mitigating actions had been taken and recommended denial. If the waiver is denied, authorized enforcement actions may include freezing the account, locking delivery facilities, suspending water allocations or transfers, and remediating the violations at ACDF LLC's expense.

Director Hughes moved to deny the waiver, with a modification directing that penalties and enforcement begin immediately unless, within five business days of the meeting, by October 27, 2026, the landowner submitted (1) a signed contract to remediate the land and (2) a sufficient deposit with the District or evidence of a prepaid contract. If both were submitted, enforcement would be stayed and the landowner would have up to sixty (60) additional days from the date of the District's letter to complete the remediation work. At Director Diener's request, the motion further provided that these terms would be implemented at staff's discretion. Director Fortune seconded the motion. Ms. Cederquist thanked the Committee for its consideration and stated that a contract had been secured to complete the remediation work. The Committee approved the motion, as modified, with the vote as follows:

Ayes: Fortune, Diener, Hughes
Nays: None
Absent: Bourdeau

Item 7. Committee to 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

Ms. Campbell recommended that the Finance and Administration Committee deny the Trust's request for a waiver extending the cure period for land-stewardship violations involving approximately 85 acres of abandoned grapevines. The Trust requested an extension of the cure deadline from October 21 to December 31, 2026, citing challenges with removing the vines after purchasing the parcel in July. Staff reported that the parcel was identified as noncompliant on September 15, 2026, and a Notice of Violation was issued on September 21, 2026. Staff noted continued fire and pest risks. If the waiver is denied, authorized enforcement actions may include freezing the account, locking delivery facilities, suspending water allocations or transfers, and remediating the violation at the owner's expense.

Director Hughes moved to deny the waiver, with a modification directing that penalties and enforcement begin immediately unless, within five business days of the meeting, by October 27, 2026, the landowner submitted (1) a signed contract to remediate the land and (2) a sufficient deposit with the District or evidence of a prepaid contract. If both were

submitted, enforcement would be stayed and the landowner would have up to sixty (60) additional days from the date of the District's letter to complete the remediation work. At Director Diener's request, the motion further provided that these terms would be implemented at staff's discretion. Director Fortune seconded the motion. No public comments were received. The Committee approved the motion, as modified, with the vote as follows:

Ayes: Fortune, Diener, Hughes
Nays: None
Absent: Bourdeau

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

Ms. Campbell asked the Finance and Administration Committee to consider a proposed policy governing water transfers outside the District. The policy is intended to support sustainable water management while maintaining flexibility for Water Users and would allow transfers under certain circumstances, including when water is at risk of loss due to rescheduling limitations, surplus long-term supply is available, or the Supplemental Water Program is undersubscribed. Transfers would not be permitted to increase groundwater pumping in the Westside Subbasin and generally should benefit a related farming entity within the receiving district. Groundwater banking transfers would continue to be governed by Policy No. 12, while all other transfers would require Board review and approval.

Director Hughes moved to recommend that the Board adopt the Policy for the Transfer of Water Out of the District. Director Fortune seconded the motion. No public comments were received. The Committee approved the motion, with the vote as follows:

Ayes: Fortune, Diener, Hughes
Nays: None
Absent: Bourdeau

Item 9. Committee to Consider Other Post Employment Benefits (OPEB) Prefunding

At the Committee's direction, this item was tabled for consideration at a future meeting.

Item 10. 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 offered.

Closed Session

Mr. Slater announced that there was no need for the Closed Session.

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

Director Diener reported that there was no need for Closed Session.

Item 11. Adjournment

There being no further business, the meeting was adjourned at approximately 9:08 a.m.

Westlands Water District

DATE: November 17, 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 request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Waiver of General Manager Authority Under Article 1, Sections 1.9B and 1.17.A.2, and Article 2, Sections 2.6G and 2.6H, Related to Delinquent Proper Land Stewardship Cure – Gradon Farms LLC

STRATEGIC PLAN KEY STRATEGIES:

1. Protect Central Valley Project (CVP) Contract and Secure Supplemental Water Supplies
2. Enhance Groundwater Resources
4. Evaluate Adaptive Land Use Strategies

DISCUSSION:

The purpose of this item is for the Finance and Administration (F&A) Committee to consider a request for variance from the Rules and Regulations pertaining to Proper Land Stewardship for Gradon Farms LLC, more specifically a request to extend the cure period to sixty (60) days from the F&A Committee's decision on this appeal.

Policy Background

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."

Timeline of Events

In August 2026, staff began mailing Noncompliance Letters to water users found to be noncompliant with the Proper Land Stewardship policy. On August 25, 2026, staff found

the Southeast ¼ of Section 2, T. 16S., R.15E. (South ½ of Assessor's Parcel Number 038 090 36S), owned by Gradon Farms LLC, to not be compliant with Proper Land Stewardship because it contains an abandoned almond orchard and weed infestation. A letter of noncompliance was mailed on September 1, 2026, and received by the water user on September 4, 2026. A Notice of Decision was mailed on October 16, 2026, and received on October 21, 2026. The water user contacted the District via email on November 6, 2026, requesting an extension of the 30-day cure period through sixty (60) days from the decision on this appeal.

On November 6, 2026, Gradon Farms LLC furnished a copy of a fully executed master services agreement with JFS Enterprises for the orchard removal work, while the agreement was dated October 14, 2026. This agreement covers two properties which includes the Gradon Farms LLC property. Gradon Farms LLC also provided a copy of the corresponding invoice paid October 29, 2026, and a copy of the completed wire payment from the receivership to JFS Enterprises on October 30, 2026.

PROPOSED MOTION:

Move to continue the waiver request to the next Finance and Administration Committee meeting, if needed, and suspend enforcement pending adoption of modifications to the Articles 1, 2, and 19.

RECOMMENDATION:

Approve the proposed motion.

Attachment

1. Notice of Decision dated October 16, 2026
2. Appeal Letter from Gradon Farms LLC dated November 6, 2026
3. Signed contract for cure work and documentation of financial ability

Westlands Water District

October 16, 2026

Ms. Lindsay Cederquist
Gradon Farms LLC, Account #[redacted]
[redacted]

Subject: Notice of Decision regarding Noncompliance with Proper Land Stewardship Requirements (INC-0006)

Dear Ms. Cederquist:

On September 1, 2026, Westlands Water District (District) sent you a Notice of Violation (NOV) which identified one of your parcels to be noncompliant with the District's Rules and Regulations[1, 2] (Regulations) requiring Proper Land Stewardship. The NOV provided a 30-day opportunity to cure the identified violation(s). Article 2, Section 2.2.T, defines Proper Land Stewardship as:

> *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.*[3]

As described in the NOV (Exhibit A), APN 038 090 36S has been found to contain an abandoned almond crop which creates a harbor for crop-damaging pests and poses a fire risk. These conditions demonstrate a failure to follow land management best practices that are customary for similarly situated water users and that lead to nuisance conditions that are harmful to growing of crops and fire that threatens crops, irrigation and water delivery infrastructure.

The 30-day cure period concluded on October 1, 2026. The District has not received verification that the previously observed violation was cured, and our recent inspection

[1] https://wwd.ca.gov/about-westlands/rules-and-regulations/
[2] https://wwd.ca.gov/wp-content/uploads/2026/09/article1.pdf
[3] See also Article 1, Section 1.2.Z (Regulations for the Groundwater Allocation Program and Use of Groundwater Within the Westside Subbasin) and Article 19, Section 19.2.F.

on October 12, 2026, confirmed the violation remains. Photo documentation of the continued noncompliance with Proper Land Stewardship Requirements is provided in Exhibit B. Failure to comply with the Proper Land Stewardship is a violation of Article 1, Sections 1.5.E and 1.9.M and Article 2, Sections 2.4.F and 2.6.G and may subject you to the following civil penalties per Article 1, Section 1.17.A(2) and Article 2, Section 2.6.I:

> *a) A **civil penalty** not to exceed **one thousand dollars ($1,000) plus one hundred dollars ($100) for each additional day** the violation continues if the person fails to comply within thirty (30) days of notification by the District*
>
> *b) Restrictions on all water furnished by the District in accordance with Water Code Section 35423*

Per Article 1, Section 1.9B, and Article 2, Sections 2.6G and 2.6H, the General Manager is authorized to take the following actions, and will proceed with implementing them, as previously stated in the NOV:

1) "Freezing" water user account #[redacted]. For the avoidance of doubt, this means that any water that is in your account will not be accessible by anyone for any purpose until the violation is cured.
2) Locking the water meters 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.[4]

If you wish to appeal this decision, any appeal must be in writing and filed with the District Secretary within 15 working days of the date of this letter.[5] The District will stay enforcement and the penalties described herein will not be imposed until the appeal deadline passes without an appeal being filed or such time as a timely filed appeal is resolved. The appeal should clearly state the NOV being appealed, the factual basis for the appeal, the relief requested and include any supporting documentation. The appellant should also describe what corrective actions are being taken or will be taken to prevent impacts on surrounding landowners or District facilities.

The General Manager has determined that this matter does not raise a Technical Issue within the meaning of Article 1. Because this matter involves Proper Land Stewardship requirements that are jointly applicable under Articles 1 and 2, any appeal of this Decision

[4] https://wwd.ca.gov/wp-content/uploads/2025/01/wwd116a.pdf
[5] See Article 2, Section 2.11.B.

will be scheduled for consideration by the Finance and Administration Committee pursuant to Article 2, Section 2.11.B of the District's Rules and Regulations, which states:

> *An appeal from any decision made pursuant to these Regulations shall be made to the Finance and Administration Committee of the Board of Directors. Such appeal shall be in writing and shall be filed with the District Secretary within 15 working days after notice of the decision. The decision of the Finance and Administration Committee may be appealed to the Board of Directors. Such appeal shall be in writing and shall be filed with the District Secretary* ***within 15 working days*** *after notice of the Finance and Administration Committee's decision. The decision of the Board shall be final.*

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 – Notice of Violation
Exhibit B – Photograph Documentation of Noncompliance

EXHIBIT A

Westlands Water District

August 28, 2026

Ms. Lindsay Cederquist
Gradon Farms LLC, Account #[redacted]

Subject: Noncompliance with Proper Land Stewardship Requirements (INC-0006)

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 36S 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 fallen trees and disking the parcel 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 Regulations[1] 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 36S, photographed from the southern boundary along Nebraska Avenue looking north.



Figure 2. APN 038 090 36S, photographed from the southeastern corner looking north.

EXHIBIT B



Figure 1. APN 038 090 36S, photographed from the southern boundary along Nebraska Avenue looking north.

November 6, 2026

VIA EMAIL

Secretary of the District
Westlands Water District
286 W. Cromwell Avenue
Fresno, CA 93711

Attn: Finance and Administration Committee and Board of Directors

Re: Appeal of Notice of Decision dated October 16, 2026 — Gradon Farms LLC, Account [redacted], APN 038-090-36S (INC-0006)

Dear Members of the Committee and the Board:

Gradon Farms LLC respectfully appeals the District's October 16, 2026 Notice of Decision regarding APN 038-090-36S under Article 2, Section 2.11.B. This appeal is filed with the Secretary of the District within 15 working days of that notice, by November 6, 2026, and it stays enforcement and penalties until it is resolved.

Gradon Farms' parcel is being cleared under the same contract as the adjoining ACDF, LLC parcel, and the steps taken to satisfy the Committee's October 20, 2026 conditions for ACDF apply equally here. The signed contract was delivered to the District on October 22, though the receipt sent with it mistakenly showed only the 25% deposit. The contract was fully prepaid and documented to the District on October 30, 2026. Our notices and updates to the District during that period referenced only ACDF. We mistakenly did not send the same notice for Gradon Farms, we take responsibility for that oversight, and this letter corrects it.

The property is held by Maricopa Orchards, LLC, in receivership under the undersigned, Lance Miller, as court-appointed Receiver, and is under contract for sale. On September 18, 2026, an extension to January 15, 2027 was requested for the adjoining ACDF parcel so the pending transaction could close; no response was received before the cure period ended. Rather than wait, the Receiver moved forward with removal on both parcels. The contractor's proposal was obtained on October 2, and the Master Services Agreement and proposal were signed on October 14, before the October 16 Notice of Decision was issued. That single JFS Enterprises contract covers the full 318-acre cleanup of both this parcel and the ACDF parcel, APN 038-090-37S.

The chronology below counts business days from the Committee's October 20, 2026 decision on the ACDF parcel, excluding weekends.

Date	Business day	Event
Aug. 28, 2026	—	Notices of Violation issued for APN 038-090-37S (ACDF) and APN 038-090-36S (Gradon Farms)
Sept. 18, 2026	—	Extension to Jan. 15, 2027 requested for the ACDF parcel due to the pending sale; no District response received

Date	Business day	Event
Sept. 29, 2026	—	Buyer asked the Receiver to proceed with tree removal and discing on both parcels; Receiver directed Diversified Land Management to proceed
Oct. 2, 2026	—	JFS Enterprises Proposal 15P-03814 issued (318 acres at Nebraska Ave. and San Mateo Ave., covering both parcels)
Oct. 14, 2026	—	Receiver signed the JFS Master Services Agreement, the proposal, and the air district packet
Fri., Oct. 16, 2026	—	Notices of Decision issued for both parcels
Tue., Oct. 20, 2026	0	Committee denied ACDF's waiver and set the five-business-day condition; JFS Invoice 10179 issued; 25% deposit of $91,245 paid the same day
Wed., Oct. 21, 2026	1	Committee decision letter dated and received
Thu., Oct. 22, 2026	2	Signed contract delivered to the District for ACDF only (no matching notice sent for Gradon Farms); the receipt for the 25% deposit was sent in error instead of proof of full payment; District confirmed this met one-fourth of the financial requirement and offered alternatives for the balance
Fri., Oct. 23, 2026	3	We notified the District in writing that the contractor would be paid in full and the paid receipt provided, possibly Monday due to wire cut-offs; District acknowledged
Mon., Oct. 26, 2026	4	Payment held: contractor wire instructions not yet received
Tue., Oct. 27, 2026	5	Deadline applied by the District to ACDF
Wed., Oct. 28, 2026	6	Wire instructions received; District notified the same day and Friday payment proposed
Thu., Oct. 29, 2026	7	Payment processing
Fri., Oct. 30, 2026	8	$365,700 wired to JFS Enterprises (Invoice 10179), confirmation #2876274732, paying the contract covering both parcels; confirmation sent to the District the same day
Mon., Nov. 2, 2026	9	District issued the Failure to Cure letter to ACDF

Full payment for the contract covering this parcel was made within two business days of receiving the wire instructions, and well within the 15-working-day appeal period of the October 16 Notice of Decision.

Gradon Farms respectfully submits that the appeal should be granted for the following reasons:

1. The cure for this parcel is under contract and fully prepaid. The same signed contract and full payment that support ACDF's appeal cover this parcel. A fully prepaid contract is the strongest form of assurance the Committee offered for the adjoining parcel. The partial-payment receipt sent on October 22 was a miscommunication, which we acknowledged to the District on October 23. The full contract price was paid by October 30.
2. The delay in full payment was short and fully disclosed. Full payment was made three business days after the deadline the District applied to ACDF. We told the District on October 23 that full payment was coming and might slip to the following Monday because of wire cut-offs, and told the District again on October 28 when the wire instructions arrived. The District acknowledged the October 23 notice and raised no objection.
3. The cause was administrative, not a lack of funds or commitment. The Receiver had the funds and the authority to pay. Payment from a court-supervised receivership account requires verified wire instructions from the payee, and those were not received until October 28. Payment was released within two business days.
4. Enforcement now would defeat the purpose of the Notice of Decision. The goal is removal of the abandoned crop. The contractor is engaged and paid in full. Freezing the account and locking meters would not speed that work and would harm the property and the pending sale.
5. Gradon Farms acted in good faith throughout. The Receiver engaged a contractor and signed the contract before the Notice of Decision issued, and paid 25% on October 20, 2026.

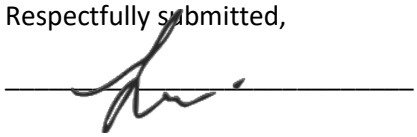
Accordingly, Gradon Farms respectfully requests that the District:

1. Grant this appeal and treat the documents delivered on October 22 and October 30, 2026 as submitted on behalf of Gradon Farms as well as ACDF;
2. Stay the enforcement actions listed in the Notice of Decision, including freezing Account [redacted] locking meters, and suspending allocations and transfers, and waive the civil penalties under Article 1, Section 1.17.A(2) and Article 2, Section 2.6.I; and
3. Allow 60 days from the decision on this appeal to complete removal and disking, consistent with the cure period the Committee offered for the adjoining ACDF parcel, or such other period as the District finds reasonable.

JFS Enterprises will dig the trees, grind them, and spread the wood chips across the field under Invoice 10179. We will provide the District progress updates every 30 days and will request a verification inspection upon completion.

Thank you for your consideration. Please contact me at [redacted] with any questions.

Respectfully submitted,



Lance Miller
Court-Appointed Receiver, Maricopa Orchards, LLC
Water User, Gradon Farms LLC, Account #[redacted]
[redacted]

Enclosures:

1. JFS Enterprises Master Services Agreement, signed October 14, 2026
2. JFS Enterprises Proposal 15P-03814, signed October 14, 2026
3. Air district packet, signed October 14, 2026
4. JFS Enterprises Invoice 10179, dated October 20, 2026
5. JFS Enterprises payment receipt for $91,245, dated October 20, 2026
6. Bank of Southern California wire confirmation for $365,700, dated October 30, 2026
7. Email correspondence with District staff, October 22–30, 2026
8. Extension request dated September 18, 2026

cc: Stephen Farmer, Chief Administrative Officer, Westlands Water District (sfarmer@wwd.ca.gov)
Sherman Dix, Deputy General Manager, Finance & Administration, Westlands Water District (sdix@wwd.ca.gov)
Brent Dragomanovich, Westlands Water District (bdragomanovich@wwd.ca.gov)
Lindsay Cederquist, [redacted]

JFS ENTERPRISES

MASTER SERVICES AGREEMENT

[redacted]

- It is anticipated that JFS Enterprises, a California corporation ("JFS") shall perform work for the undersigned party ("Owner"). Owner and JFS enter into this Master Services Agreement ("Agreement") for the purpose of defining certain rights and obligations of each, which will remain effective throughout their continued relationship. Each specific item of service ("Work") to be performed by JFS will be defined in a separate proposal (Proposal") which will incorporate by reference the terms of this Agreement. All Work performed pursuant to a Proposal shall be performed pursuant to the terms and conditions of this Agreement. JFS proposes, and shall only be required, to furnish to Owner the services, supervision, equipment, transportation and supplies specifically described in the Proposal. JFS is not required to perform any additional work unless such work is memorialized and agreed upon by JFS and Owner in a Proposal. Any additional work performed other than the Work provided for in a Proposal will result in additional charges.
- Each Proposal is based upon a visual inspection only and reasonable assumptions based on ordinary conditions and pricing based upon acreage is an estimate only and will be adjusted at final invoice to reflect actual acreage.
- Owner shall be responsible at its expense to obtain all necessary permits and licenses and to pay all governmental fees connected with the demolition and burning of the vineyard or orchard.
- Supervision and administration of burning is not an obligation or responsibility of JFS. Owner is responsible to obtain burn permits and to monitor and administer onsite burning (including timing, location and clean up) to assure a safe burn and in order to pass inspection.
- Any assistance to Owner in commencing the burn process (lighting piles) is merely an accommodation to Owner and is not part of the scope of the Work. Availability of JFS on District approved burn days is subject to availability and early notice to JFS. Delays in completion due to the procurement of a permit or availability on burn days is not the responsibility of JFS. Owner shall at all times control, manage and oversee burning activities on Owner's fields; and Owner remain responsible for delays and be liable for any damages to property or person resulting from the burn process. Owner shall sign and deliver the attached Indemnification and Hold Harmless Agreement which shall be applicable to all burn activities.
- To the extent that JFS is to remove scrap metal, Owner agrees to transfer any rights and interests in such metal to JFS.
- All demolition, removal and stacking will be performed by heavy equipment. At completion, the field will be left in an organized and reasonably good equipment-prepared condition. JFS will not be responsible for hand picking and/or manually sorting the fields or burn piles.
- Piling of vines or trees after digging is subject to JFS availability and scheduling and usually will not occur for at least 3 weeks after the excavation. JFS will make commercially reasonable efforts (subject to Force Majeure events and governmental delays) to pile vines or trees prior to the end of the minimum 6-week drying period mandated by the air pollution control district. If JFS is asked to assist Owner with initiating the burn for Owner, Owner shall give JFS burn permit number, location number, and security code.
- If Owner is responsible for preparing field for removal, Owner shall, among other things, cut wire every 10 vines and make sure no vineyard wire is hanging on the ground; pull and remove at least three vines away from all pipelines & roads (as marked by Owner) that Owner desires to be saved; end posts shall be removed by Owner; and pushed vines placed by Owner in every other row in order to assure that every other row is clear for JFS to drive down).

Additional Conditions

- JFS is an independent contractor with respect to performance of the Work and neither JFS nor its employees shall be deemed to be a servant, employee, partner, or joint venturer of Owner.
- In any proceeding (judicial or otherwise) is brought by one party hereto against the other to enforce or interpret the terms of this Agreement or a Proposal or to resolve any dispute concerning any part of the Work, the party prevailing in the proceeding shall be entitled, in addition to any other relief, to an award of all its costs incurred in connection with the proceeding, including reasonable attorneys' fees.
- JFS assumes no responsibility for damage to any above ground or underground irrigation lines, pipes or other infrastructure.
- Unless otherwise provided in a signed wiring, payment in full is due upon substantial completion of the Work.
- This Agreement and any Proposal may be executed in multiple original counterparts, each counterpart to be deemed an original, but all of such counterparts shall constitute one and the same agreement. Owner may approve this Agreement and any Proposal by electronic transmission memorializing its consent and approval.
- Upon approval, this Agreement and all documents referenced herein constitute the entire agreement between the parties and may be changed only by a written amendment executed by both parties.
- Delays in the substantial completion of Work due to Force Majeure events are excused. "Force Majeure" shall mean an act of God, fire, tornado, hurricane, flood, earthquake, explosion, war, act of terrorism at the Project, civil disturbance, labor strikes, an unusually severe storm, delays in governmental permitting and approval delays, or an unavoidable casualty beyond JFS' control.
- By accepting this Agreement, the party approving as Owner represents and warrants that he/she is the sole owner of the real property on which the Work is to be performed or has been duly authorized by the Owner or Owners to approve, authorize and execute this Agreement and the Proposal.
- If there are any questions or concerns regarding the quality or sufficiency of the Work, Owner must notify JFS orally and in writing within 24 hours of first noticing the item of concern.
- Interest charges of 1.5% per month or 18% annual percentage rate shall accrue on all past due balances.
- If Owner fails to timely pay, JFS is entitled to secure and preserve its collection rights afforded under applicable mechanics' lien laws.

Acceptance of Agreement

By signing below or responding in writing with an email approval, the Owner hereby approves all terms, covenants and conditions of this Agreement, including any attachments to this Agreement which are incorporated herein by reference.

"Owner"

Signed _____

Print Name & Title Lance Miller, in his sole capacity as court appointed receiver

Date 10/14/2026

"JFS" JFS Enterprises, a California corporation

Signed John Yergat

Print Name & Title John Yergat, President

Date _____

Invoice

JFS Enterprises, INC
[redacted]

Tax ID [redacted]
Phone # [redacted]

Date	Invoice #
10/20/2026	10179

PAID 10/29/2026

Bill To	Job Location
Maricopa Orchards, LLC in Receivership **Lance Miller, in his sole capacity as a court appointed receiver** [redacted]	**Nebraska Ave & San Mateo Ave** **318 acres** **APN's** **038-090-36S** **038-090-37S**

P.O. No.	Terms	Project
Job 4299	Due on receipt	4299 - Maricopa...

Description	Qty	Rate	Amount
1. Dig trees at $75 per acre	318	75.00	23,850.00
2. Grind and leave wood chips on site $825 per acre	318	825.00	262,350.00
3. Spread wood chips in field with Spreader at $250 per acre	318	250.00	79,500.00
PAYMENT TERMS - 25% due upon signing of Proposal - Total of $91,245 due			
APN Numbers 038-090-36S 038-090-37S			

***********JFS Enterprises offers start to finish and turnkey services such as vineyard removal (burning or grinding), orchard removal (burning or grinding), deep ripping, and all aspects of land development.***********

Please remit payment to:
[redacted]

Notice: A PAST DUE CHARGE OF 18% PER ANNUM WILL BE ADDED TO ACCOUNTS 30 DAYS & OLDER

Subtotal	$365,700.00
Sales Tax (8.25%)	$0.00
Total	$365,700.00
Payments/Credits	-$365,700.00
Balance Due	**$0.00**

BANK OF SOUTHERN CALIFORNIA

Completed Wire Details

Debit Information

Template Name:	JFS Enterprise Inc
Wire Type:	Domestic wire
Account:	MARICOPA ORCHARDS LLC RECEIVERSHIP - *1244
Effective Date:	10/30/2026
Amount:	365,700.00
Currency:	USD
Entered By:	NHAINE
Entry Date/Time:	10/30/2026 11:05:22 am (ET)
Transmitted By:	SBORSE
Transmit Date/Time:	10/30/2026 11:07 AM (ET)
Status:	CONFIRMED
Confirmation Number:	2876274732
Reference Number:	20261030MMQFMP6D000054

Recipient Information

Bank ID Type:	ABA
Bank ID:	[redacted]
Bank Name:	ZIONS BANCORPORATION, NA DBA CALIFO
City/Town:	SAN FRANCISCO
State/Province Name:	CA
Country:	USA
Recipient Account:	[redacted]
Recipient Name:	JFS ENTERPRISES INC
Building Name:	[redacted]

Street Name:	[redacted]
City/Town:	[redacted]
Zip/Postal Code:	[redacted]
Country:	USA
Purpose of Payment:	Payments for services
Additional Information for Recipient:	inv 10179

Wire Initiator Information

Wire Initiator Name:	Maricopa Orchards LLC Receivership
City/Town:	[redacted]
State/Province Name:	[redacted]
Zip/Postal Code:	[redacted]
Country:	USA

Approval History Information

Approval Status: 1 of 1 received

Action	User ID	Date	Time
Enter Request	NHAINE	10/30/2026	11:05:22 AM (ET)
Approve Request	SBORSE	10/30/2026	11:07:09 AM (ET)

Westlands Water District

DATE: November 17, 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 request for Waiver of Rules and Regulations, Terms and Conditions, or Other District Financial Provisions – Waiver of General Manager Authority Under Article 1, Sections 1.9B and 1.17.A.2, and Article 2, Sections 2.6G and 2.6H, Related to Delinquent Proper Land Stewardship Cure – Solstice Energy Center, LLC

STRATEGIC PLAN KEY STRATEGIES:

1. Protect Central Valley Project (CVP) Contract and Secure Supplemental Water Supplies
2. Enhance Groundwater Resources
4. Evaluate Adaptive Land Use Strategies

DISCUSSION:

The purpose of this item is for the Finance and Administration (F&A) Committee to consider a request for variance from the Rules and Regulations pertaining to Proper Land Stewardship for Solstice Energy Center LLC, more specifically a request to extend the cure period.

Policy Background

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."

Timeline of Events

In August 2026, staff began mailing Noncompliance Letters to water users found to be noncompliant with the Proper Land Stewardship policy. On September 2, 2026, staff

found four (4) Assessor's Parcel Numbers (APN), owned by Solstice Energy Center LLC, to be noncompliant with Proper Land Stewardship as the parcels contained an abandoned almond orchard and weed infestation. A letter of noncompliance was mailed on September 21, 2026, and received by the water user on September 24, 2026.

The water user contacted the District via email on October 29, 2026, requesting an extension of the 30-day cure period. The reason for the extension cited in the email is to allow sufficient time to complete the necessary biological clearances, coordinate contractor mobilization, and perform the orchard removal work.

A Notice of Decision was mailed on November 10, 2026.

PROPOSED MOTION:

Move to continue the waiver request to the next Finance and Administration Committee meeting, if needed, and suspend enforcement pending adoption of modifications to the Articles 1, 2, and 19.

RECOMMENDATION:

Approve the proposed motion.

Attachment

1. Notice of Decision dated November 3, 2026
2. Appeal Email from Solstice Energy Center LLC dated October 29, 2026

Westlands Water District

November 3, 2026

Ms. Lindsay Cederquist
Solstice Energy Center LLC, Account #[redacted]
[redacted]

Subject: Notice of Decision regarding Noncompliance with Proper Land Stewardship Requirements (INC-00057-60)

Dear Ms. Cederquist:

On September 21, 2026, Westlands Water District (District) sent you a Notice of Violation (NOV) which identified one of your parcels to be noncompliant with the District's Rules and Regulations[1, 2] (Regulations) requiring Proper Land Stewardship. The NOV provided a 30-day opportunity to cure the identified violation(s). Article 2, Section 2.2.T, defines Proper Land Stewardship as:

> *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.*[3]

As described in the NOV (Exhibit A), APN 027 171 84S, 027 171 85S, 027 171 60S, and 027 171 15S have been found to contain an abandoned almond crop and weed infestation, which creates a harbor for crop-damaging pests and poses a fire risk. These conditions demonstrate a failure to follow land management best practices that are customary for similarly situated water users and that lead to nuisance conditions that are harmful to growing of crops and fire that threatens crops, irrigation and water delivery infrastructure.

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[1] https://wwd.ca.gov/about-westlands/rules-and-regulations/
[2] https://wwd.ca.gov/wp-content/uploads/2026/09/article1.pdf
[3] See also Article 1, Section 1.2.Z (Regulations for the Groundwater Allocation Program and Use of Groundwater Within the Westside Subbasin) and Article 19, Section 19.2.F.

The 30-day cure period concluded on October 21, 2026. The District received your appeal on October 29, 2026, requesting an extension of this deadline. The District has not received verification that the previously observed violation was cured, and our recent inspection on November 2, 2026, confirmed the violation remains. Photo documentation of the continued noncompliance with Proper Land Stewardship Requirements is provided in Exhibit B. Failure to comply with the Proper Land Stewardship is a violation of Article 1, Sections 1.5.E and 1.9.M and Article 2, Sections 2.4.F and 2.6.G and may subject you to the following civil penalties per Article 1, Section 1.17.A(2) and Article 2, Section 2.6.I:

> *a) A **civil penalty** not to exceed **one thousand dollars ($1,000) plus one hundred dollars ($100) for each additional day** the violation continues if the person fails to comply within thirty (30) days of notification by the District*
>
> *b) Restrictions on all water furnished by the District in accordance with Water Code Section 35423*

Per Article 1, Section 1.9B, and Article 2, Sections 2.6G and 2.6H, the General Manager is authorized to take the following actions, and will proceed with implementing them, as previously stated in the NOV:

1) "Freezing" water user account #[redacted]. For the avoidance of doubt, this means that any water that is in your account will not be accessible by anyone for any purpose until the violation is cured.
2) Locking the water meters 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.[4]

If you wish to appeal this decision, any appeal must be in writing and filed with the District Secretary within 15 working days of the date of this letter.[5] The District will stay enforcement and the penalties described herein will not be imposed until the appeal deadline passes without an appeal being filed or such time as a timely filed appeal is resolved. The appeal should clearly state the NOV being appealed, the factual basis for the appeal, the relief requested and include any supporting documentation. The appellant should also describe what corrective actions are being taken or will be taken to prevent impacts on surrounding landowners or District facilities.

[4] https://wwd.ca.gov/wp-content/uploads/2025/01/wwd116a.pdf
[5] See Article 2, Section 2.11.B.

The General Manager has determined that this matter does not raise a Technical Issue within the meaning of Article 1. Because this matter involves Proper Land Stewardship requirements that are jointly applicable under Articles 1 and 2, any appeal of this Decision will be scheduled for consideration by the Finance and Administration Committee pursuant to Article 2, Section 2.11.B of the District's Rules and Regulations, which states:

> *An appeal from any decision made pursuant to these Regulations shall be made to the Finance and Administration Committee of the Board of Directors. Such appeal shall be in writing and shall be filed with the District Secretary within 15 working days after notice of the decision. The decision of the Finance and Administration Committee may be appealed to the Board of Directors. Such appeal shall be in writing and shall be filed with the District Secretary* ***within 15 working days*** *after notice of the Finance and Administration Committee's decision. The decision of the Board shall be final.*

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 – Notice of Violation
Exhibit B – Photograph Documentation of Noncompliance

EXHIBIT A

Westlands Water District

September 15, 2026

Ms. Lindsay Cederquist
Solstice Energy Center LLC, Account #[redacted]
[redacted]

Subject: Noncompliance with Proper Land Stewardship Requirements (INC-00057 - 60)

Dear Ms. Cederquist:

On September 2, 2026, Westlands Water District (District) staff identified two of parcels to be noncompliant with the District's Rules and Regulations requiring Proper Land Stewardship. APNs 027 171 84S, 027 171 85S, 027 171 60S, and 027 171 15S have been found to contain an abandoned almond crop and weed infestation which creates 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 abandoned crop and disking the parcel to remove the weeds. If not addressed within this time frame, 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 Regulations[1] 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



Figure 1. APN 027 171 85S, photographed from the northern boundary along Manning Avenue, facing south.



Figure 2. APN 027 171 84S, photographed from the western boundary, facing east.



Figure 3. APN 027 171 60S photographed from the southern boundary, looking north.



Figure 4. APN 027 171 15S photographed from the southern boundary, looking north.

EXHIBIT B



Figure 1. APN 027 171 85S photographed from the northern boundary, looking east.



Figure 2. APN 027 171 84S photographed from the southwestern corner, looking east.



Figure 3. APN 027 171 60S photographed from the southeastern corner, looking north.



Figure 4. APN 027 171 15S photographed from the southwestern corner, looking north.

From:	Lindsay Cederquist
To:	Brent Dragomanovich
Cc:	Balleza, Paul; Stephen Farmer
Subject:	Land Stewardship- Extension Request
Date:	Thursday, October 29, 2026 4:09:39 PM

Mr. Dragomanovich,

I am writing regarding the September 21, 2026, notice of non-compliance for APNs 027-171-84S, 027-171-85S, 027-171-60S, and 027-171-15S.

Solstice Energy Center, LLC acquired the property on May 22, 2026, and is committed to addressing the identified land stewardship concerns and bringing the property into compliance with Westlands Water District requirements.

We have selected a contractor to perform the required orchard removal work and are finalizing the contract, crew availability, and schedule. The work also requires coordination of applicable biological considerations, including species sensitivities, pre-activity clearance surveys, and any necessary biological monitoring.

Accordingly, we respectfully request an extension of the compliance deadline to allow sufficient time to complete the necessary biological clearances, coordinate contractor mobilization, and perform the orchard removal work. We will continue working diligently toward compliance and will provide the District with an anticipated schedule once contractor availability is confirmed.

Please let us know whether the District can accommodate this request or if any additional information would be helpful.

Thank you for your consideration.

Lindsay Cederquist | Principal
Aqua Insights Incorporated
[redacted]

Westlands Water District

ITEM 6

DATE: November 17, 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 administrative benefits to the District, staff will return to the Committee or Board with options and recommendations for further consideration.

PROPOSED MOTION:

Move to approve establishing a policy that annual budgeted OPEB costs be contributed to a prefunding trust at the beginning of each fiscal year

RECOMMENDATION:

Approve the proposed motion

Attachment

None