

February 28, 2025

Cory Bantilan, Chair
Cuyama Basin Groundwater Sustainability Agency
Cuyama Valley Family Resource Center 4689 CA-166
New Cuyama, California 93254

Sent via email to: TBlakslee@hgcpm.com

RE: The Variance Process and Recommendations for the Future

Dear Chair Bantilan:

The UC Davis School of Law Small Farmer Water Justice Clinic (“Clinic”) submits this letter to the Cuyama Basin Groundwater Sustainability Agency (“CBGSA”) for your consideration.

The Clinic was founded in July 2024 to assist small farmers with their legal issues relating to their water use and water rights, especially those issues involving the Sustainable Groundwater Management Act (SGMA). As part of that mission, the Clinic assisted a small farmer with a variance request during the December interview and January hearing. It is our understanding that CBGSA intends to make improvements to the variance process this year. The Clinic supports that effort and believes that improvements to the variance process can be made that will better take into account the special circumstances relating to small farmers and that policies can be pursued by CBGSA to avoid the need for a variance. The Clinic would like to collaborate with CBGSA on this endeavor to improve the variance process for small farmers.

We believe the Clinic’s collaboration on the variance process will be helpful to CBGSA as a whole. Collaboration between the Clinic and CBGSA can be a cost-effective method for CBGSA to study and consider policy decisions for the benefit of small farmers in the Cuyama community. CBGSA has many competing priorities that divert limited time and resources away from studying how policy decisions could impact small farmers. The Clinic is prepared to step up to assist CBGSA and its staff by providing input and legal research services to support small farmers.

We request that CBGSA include the Clinic in policy and legal developments that can impact small farmers such as parameters for future variance processes, glide path discussions, and adopting protections for small farmers.

We hope to forge a collaborative relationship and provide resources to CBGSA to the best of our ability. If you have any questions, please reach out to David Sandino at (530) 754-2067 or Christopher Mouawad at cjmouawad-clinic@law.ucdavis.edu.

Sincerely,

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CC: Grace Bianchi