

FY 2026-2027 Groundwater Fee Appeals

Staff Analysis & Recommendations Approved by Board on June 24, 2026 and July 22, 2026

1. Overview & Summary

On May 7, 2026, PRAGA posted the Draft Rate and Fee Study Report and a parcel-level list of proposed charges on its website, and provided notice to approximately 600 stakeholders via press release and email. The proposed fee applies to agricultural, commercial, and public water system parcels, and is based on consumptive groundwater use at a rate of \$22.90 per acre-foot. The Board directed staff to initiate a 30-day public review and appeal of the proposed fee for technical-based claims and a notice and form were included along with the rate study notification. The deadline for appeals was June 8, 2026, and 30 appeals were received. PRAGA established an appeals process for landowners to 1) appeal their consumed groundwater use amount, or 2) claim an exemption based on non-groundwater source. Technical appeals were reviewed by the technical consultant (Land IQ) and PRAGA staff.

Appeal Categories

Appeals fall into three categories:

Category	Description	Count
Technical	Claim that Land IQ ET-based consumed use figure is incorrect or claim that parcel was not irrigated in WY2025 (fallowed, dry-farmed, vines removed, etc.).	18
Technical (Source)	Claim that consumed use is not groundwater.	8
Non-Technical	Challenge to fee authority, Prop 26 basis, or ET methodology.	4
Total		30

Master Appeal Summary

Appeals are listed in the order received below.

	Landowner	APN(s)	Appeal Category	Initial PRAGA Consumed Use (AF)	Initial Fee	Recommended Use	Recommended Fee
1	Dan Larson	033-311-009	Technical	0.14	\$3.21	0.14	\$3.21
2	Scott Raven	020-282-005	Technical (Source)	52.77	\$1,208.55	0.00	\$0.00
3	Ronald Dawson	033-291-033	Technical	6.25	\$143.15	1.51	\$34.58
4	Michael Young	043-273-010/011	Technical	0.00	\$0.00	0.00	\$0.00
5	James Stollberg	027-191-052/053 027-071-026/027	Technical	145.28	\$3,326.91	76.88	\$1,760.55
6	Robert Nadeau	019-071-064	Technical	52.80	\$1,209.10	52.80	\$1,209.10
7	De La Terre Farms	035-081-043	Technical	93.02	\$2,130.19	55.27	\$1,265.68
8	Colleen Enk	027-144-011	Technical	27.20	\$622.83	0.00	\$0.00
9	Jeff Konsmo	035-091-041	Technical	4.18	\$95.75	1.55	\$35.50
10	Dennis Degher	027-171-006	Technical	1.95	\$46.59	0.00	\$0.00
11	Mary Russell	017-251-073	Technical	50.28	\$1,151.44	0.00	\$0.00
12	River Oaks Golf Course	025-390-027	Technical (Source)	43.51	\$996.34	0.00	\$0.00
13	Tom Carlisle	034-511-008	Technical	6.12	\$140.07	0.00	\$0.00
14	Anthony Silveira	026-104-061 026-141-047/048	Technical (Source)	41.35	\$946.90	0.00	\$0.00
15	Greg Barr	015-053-016	Technical	44.47	\$1,018.41	44.39	\$1,016.58
16	Victor Roberts	033-331-044/045/046	Technical	46.52	\$1,065.33	25.66	\$587.61

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	Landowner	APN(s)	Appeal Category	Initial PRAGA Consumed Use (AF)	Initial Fee	Recommended Use	Recommended Fee
17	Robert Erzen	027-152-082	Technical	7.33	\$167.87	0.00	\$0.00
18	Cristina Lea	035-091-047	Technical	3.25	\$74.42	3.25	\$74.42
19	Jean Rollins	035-031-014	Non-Technical	2.27	\$52.00	2.27	\$52.00
20	James & Debra Saunders	026-431-008	Technical	34.79	\$796.69	34.79	\$796.69
21	James & Debra Saunders	027-144-012	Technical (Source)	23.88	\$573.60	23.88	\$573.60
22	James & Debra Saunders	027-144-029	Non-Technical	16.21	\$371.23	16.21	\$371.23
23	Steve Eorio	020-011-056	Technical	0.71	\$16.33	0.00	\$0.00
24	Steven Carter	026-183-001	Technical	68.97	\$1,579.34	59.84	\$1,370.34
25	Bricen Cagliero	027-144-002	Technical (Source)	54.13	\$1,239.59	54.13	\$1,239.59
26	Cagliero (P8/P9)	027-191-060 027-191-067	Technical (Source)	207.66	\$4,755.51	115.19	\$2,637.85
27	Cagliero (P10)	027-381-006	Technical (Source)	100.01	\$2,290.31	0.00	\$0.00
28	Cagliero Vineyards	23 APNs	Technical (Source)	1,526.83	\$35,117.67	1,526.83	\$35,117.67
29	Wells Fargo	Not specified	Non-Technical	-	-	-	-
30	Noel Ryan	043-241-004	Non-Technical	57.79	\$1,323.41	57.79	\$1,323.41
				2,719.67	\$62,462.74	2,152.38	\$49,469.61

2. Individual Appeal Analyses

1. APN: 033-311-009

Landowner: Dan Larson

TECHNICAL APPEAL

Date Received: May 8, 2026

Appeal Claim:

Disagrees with water use calculation; requests additional proof for extraction amounts.

Documentation Presented:

No additional supporting documentation attached.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
033-311-009	Unclassified Fallow, Grapes	0.19	0.14	\$3.21

Staff Analysis:

The 0.14 AF is for evapotranspiration (minus effective precipitation) on the 0.2 acre vineyard block, which equates to about 9 inches per acre of consumed applied water. The other two fields on the APN are a Net ET of 0. The Net ET for the 0.2 acre vineyard block was on the lower end of all Paso vineyards, and is consistent with expected irrigation for the crop. Landowner did not provide any additional data that would change this analysis.

Staff Recommendation: No change to the groundwater sustainability fee for this parcel because the initial consumed groundwater use data associated with the parcel was verified by Land IQ and there is no contravening evidence.

2. APN: 020-282-005

Landowner: Scott Raven

TECHNICAL APPEAL (SOURCE)

Date Received: May 13, 2026

Appeal Claim:

Parcels are irrigated using Salinas River wells located within the Atascadero Basin, not the Paso Robles Subbasin. Water is diverted under appropriative rights from the Salinas River.

Documentation Presented:

Map of well locations; SWRCB Appropriative Rights Claim IDs: A017905 / Permit 6346 and A012285 / Permit 4426.

Water Source Analysis:

Statement/License ID	Claim Type
A017905 / Permit 6346 A012285 / Permit 4426	Appropriative

Staff Analysis:

No wells on landowner parcel, consumed use is not Paso Basin groundwater.

Staff Recommendation: Exempt this parcel from the groundwater sustainability fee because staff verified the well irrigating the crop does not draw from the Paso Robles Subbasin.

3. APN: 033-291-033

Landowner: Ronald Dawson

TECHNICAL APPEAL

Date Received: May 16, 2026

Appeal Claim:

Consumed use of 6.5 AF is substantially overestimated.

Documentation Presented:

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Flow meter photos with date stamps showing extracted use of 1.51 AF.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
033-291-033	Grapes	7.80	6.25	\$143.15

Staff Analysis:

Landowner provided documentation to confirm that the meter is new and was installed on 9/9/2024. Grower did not have a calibration test since it was new and calibrated at factory. The meter reading corresponds to 3 in/ac of irrigation. Photo of meter installation was reviewed. The manufacturer states you can install vertically or horizontally and doesn't specify a straight pipe criterion. They have a Grundfos pump, and the pump flow rate (20-30 gpm) is within the normal range recommended for the meter. The meter is upstream of the holding tank. They estimate how much water came out of the holding tank for irrigation in their irrigation log which was lower than the meter reading. Yield was 3 tons/ac, which is lower than average and more typical for dryland farmed grapes, where yields are commonly 2-4 tons/acre depending on soil moisture and other variables. The groundwater pump and meter are smaller scale than typical ag operations, so there is little information available about the installation requirements and accuracy for this application. There were no obvious errors in the meter reading.

Staff Recommendation: Change the groundwater sustainability fee to \$34.58 because the landowner provided sufficient evidence to demonstrate consumed groundwater use of 1.51 AF.

4. APN: 043-273-010, 043-273-011

Landowner: Michael Young

TECHNICAL APPEAL

Date Received: May 18, 2026

Appeal Claim:

Parcels are not irrigated. No well exists on parcel 043-273-010.

Documentation Presented:

Letter from farm manager.

Fee/Use Data:

APN	WY2025 Consumed Use (AF)	Pond Evap. (AF)	Initial Fee
043-273-010	0.00	—	—
043-273-011	0.00	—	—

Staff Analysis:

Both parcels already show \$0 fee and zero (0) consumed use in the dataset.

Staff Recommendation: No change to the groundwater sustainability fee for this parcel because the initial consumed groundwater use data associated with the parcel is zero (0) resulting in no charge to the landowner.

5. APN: 027-191-052, 027-191-053, 027-071-026, 027-071-027

Landowner: James Stollberg

TECHNICAL APPEAL

Date Received: May 18, 2026

Appeal Claim:

Combined consumed use of 145.28 AF is substantially overestimated.

Documentation Presented:

Flow meter reports with date stamps and readings for each parcel.

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Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
027-191-052	Grapes	16.86	20.55	\$470.71
027-191-053	Unclassified Fallow, Grapes	35.92	37.21	\$852.02
027-071-026	Grapes	38.14	48.90	\$1,119.79
027-071-027	Grapes, Unclassified Fallow	36.77	38.62	\$884.40
TOTAL		127.69	145.28	\$3,326.92

Staff Analysis:

For WY 2025, the landowner's meter reading was 77.0 AF (~12 in/ac). Land IQ net ET was 145.28 AF. Meter is a Seametrics mag meter which appears to have an adequate straightpipe in the photo provided, and mag meters are generally considered more accurate than impeller style meters. Landowner indicated about half of the grape blocks were last irrigated in fall 2024 and not all during 2025. For the blocks that were not irrigated in 2025, the grower reported no yield and the satellite imagery showed a decline in vegetation vigor and evidence of removal in 2026. If the blocks that were not farmed in 2025 are removed, the remaining irrigated blocks had an ET of ~85.4 AF for WY2025 which is close to the meter reading of 77 AF. Abandoned grapes will continue to ET for some time (months) after irrigation ceases and soil moisture reservoir is depleted.

Staff Recommendation: Change groundwater sustainability fee to 1,760.55 because the landowner provided sufficient evidence to demonstrate consumed groundwater use of 76.88 AF.

6. APN: 019-071-064

Landowner: Robert Nadeau

TECHNICAL APPEAL

Date Received: May 20, 2026

Appeal Claim:

Approximately 1/3 of vineyard vines were removed during WY2025, reducing planted acreage from approximately 110 acres to 72.6 acres. Requests confirmation that updated acreage is reflected in consumptive use calculations.

Documentation Presented:

Appeal form and vine removal photos provided.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
019-071-064	Grapes	56.02	52.80	\$1,209.10

Staff Analysis:

The grape ET is reasonable for the 2025 water year. Unique ID 6176 and 1925 were removed in March of 2026; this will be flagged accordingly for the 2026 water year.

Staff Recommendation: No change to the groundwater sustainability fee because portions of vineyards were removed outside the fee calculation period (Oct 1, 2024-Sep 30, 2025).

7. APN: 035-081-043

Landowner: De La Terre Farms LLC

TECHNICAL APPEAL

Date Received: May 26, 2026

Appeal Claim:

Land was fallowed in 2025. Eucalyptus trees on the parcel should not have consumed water in the fee calculation.

Documentation Presented:

No additional supporting documentation attached.

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Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
035-081-043	Grapes, Flowers, Nursery and Christmas Tree Farms	59.99	93.02	\$2,130.19

Staff Analysis:

There is a noticeable decline in grape vigor that points to reduced or possibly halted irrigation. In the dataset, two of the grape fields are also classified as abandoned. One is marked as irrigated and the other as non-irrigated. Grower states established eucalyptus in California requires "little to no irrigation. It was planted 4 years ago and requires only a little water every 2 weeks in June/July/August." Grower states unique ID 4975 is still being irrigated "enough to keep the vines alive" and the rest of the vines will be removed by the end of 2026. For the grapes, abandoned vineyard should be adjusted to zero. The analysis shows that the vineyard field (Unique ID 3072) is abandoned and the ET should be adjusted to zero (0). For the vineyard field (Unique ID 4975), the analysis shows this vineyard is alive. For eucalyptus – since there was some irrigation and no estimate provided of actual water applied to provide a basis for adjustment, recommend leaving value as is.

Staff Recommendation: Change groundwater sustainability fee to \$1,265.68 because Land IQ's review indicated multiple fields were abandoned, and existing vineyard and eucalyptus consumption indicate 55.27 AF consumed groundwater use.

8. APN: 027-144-011

Landowner: Colleen Enk / Samantha Cagliero

TECHNICAL APPEAL

Date Received: May 29, 2026

Appeal Claim:

Parcel was not irrigated in 2025 — a dry-land grain hay crop was planted. The only well that can irrigate this parcel when it is planted in an irrigated crop draws from riparian rights (Statement S021890), not groundwater.

Documentation Presented:

WY2025 Supplemental Statement of Water Diversion and Use (Statement S021890, Riparian claim) and dryland grain hay crop planted as rotation.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
027-144-011	Alfalfa and Alfalfa Mixtures	26.05	27.20	\$622.83

Water Source Analysis:

Statement/License ID	Claim Type
S021890	Riparian

Staff Analysis:

The landowner states – "there was an alfalfa field in 2024. The last cutting was in August and the last irrigation in early Aug. 2024. The alfalfa was removed and dryland grain planted. The irrigation in 2024 was from a riparian well that is registered with annual water diversion reporting to the SWRCB." Satellite imagery confirms the last alfalfa cutting was in August. There was regrowth in October 2024 but no harvest, and imagery did not have any clear evidence of irrigation within the 2025 water year. ET was very likely from application during the end of the prior water year and depletion of store soil moisture into the 2025 water year. The State Water Resource Control Board statement S021890 confirms zero diversion in water year 2025. The landowner provided Statement of Water Diversion and Use documenting non-groundwater pumping.

Staff Recommendation: Change the groundwater sustainability fee to zero (\$0) because Land IQ confirmed no irrigated cultivation during water year 2025.

9. APN: 035-091-041**Landowner:** Jeff Konsmo**TECHNICAL APPEAL***Date Received: May 29, 2026***Appeal Claim:**

Consumed water use is substantially overestimated.

Documentation Presented:

Irrigation logs from two weeks of irrigation, detailed irrigation schedule.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
035-091-041	Olives, Grapes	4.95	4.18	\$95.75

Staff Analysis:

Grower used two weeks of irrigation logs from HydraWise to extrapolate over 6 months since HydraWise does not store more than 2 months of data. This provides an assumed value but no data to corroborate. There is no documentation of how the Hydrowise system is estimating the gallons applied if there is no meter. Grower stated they irrigate from 8pm to 8am every day from mid-May to mid-November, so it doesn't seem reasonable that only 0.4 in/ac could be applied with that schedule. The grape acreage is very small and the land use is mostly olives. The grape ET is reasonable compared to grower data and does not need to be adjusted. The olive acreage is 4.86 ac. The grower indicated 0.17 AF was applied, which is only 0.4 in of water per acre, but also indicate daily irrigation schedule from 8 PM to 8 AM. For an irrigated system, that water amount is very low. Grower provided additional information - meter data provided September 2022 to June 2026, assuming mid-May to mid-November irrigation season as stated above. Meter data of 1,689,200 ga in above time period includes most of 2026 WY outside of irrigation season. Accounting for 2023, 2024 and 2025 WYs and 0.33 of 2026 WY, water use equates to 1.55 AF/WY, which is more reasonable than 0.17 AF on original claim.

Staff Recommendation: Change to the groundwater sustainability fee to \$35.50 for this parcel because the landowner provided sufficient evidence to demonstrate consumed groundwater use of 1.55 AF.

10. APN: 027-171-006**Landowner:** Dennis Degher**TECHNICAL APPEAL***Date Received: June 1, 2026***Appeal Claim:**

Land has been fallowed since 2023 and landowner is in the process of enrolling in a formal fallowing program.

Documentation Presented:

No additional supporting documentation attached.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Commercial Use (AF)	Initial Fee
027-171-006	Grapes	3.20	1.95	0.08	\$46.59

Staff Analysis:

Field was confirmed as abandoned on satellite imagery.

Staff Recommendation: Change groundwater sustainability fee to zero (\$0) because Land IQ confirmed land was fallowed during water year 2025.

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11. APN: 017-251-073

Landowner: Mary Russell

TECHNICAL APPEAL

Date Received: June 2, 2026

Appeal Claim:

No groundwater was pumped during WY2025.

Documentation Presented:

Detailed explanation of harvest/planting schedule.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
017-251-073	Unclassified Fallow, Carrots	52.23	50.28	\$1,151.44

Staff Analysis:

Carrots were present for ~10 days in early October 2024, but for the remainder of the 2025 WY the field was fallow/dryland grain. The carrot ET in Oct. 2024 was likely carried over from irrigation applied during the prior WY 2024 and depletion of stored soil moisture and flush of ET at harvest when soil is opened up when digging carrots.

Staff Recommendation: Change the groundwater sustainability fee to \$0 because Land IQ confirmed land was fallowed during water year 2025.

12. APN: 025-390-027

Landowner: River Oaks Golf Course (Dick Willhoit)

**TECHNICAL APPEAL
(SOURCE)**

Date Received: June 2, 2026

Appeal Claim:

Golf course is irrigated using Salinas River riparian wells operating under appropriative rights,

Documentation Presented:

CalWATRS records for Water Right Claim IDs S018860 and S018869 (both Active, Riparian type).

Fee/Use Data:

APN	WY2025 Consumed Use (AF)	Initial Fee
025-390-027	43.51	\$996.34

Water Source Analysis:

Statement/License ID	Claim Type
S018869	Riparian (Appropriative)
S018860	Riparian

Staff Analysis:

Landowner provided the appropriate documentation to support non-groundwater use for its consumptive use calculation for WY 2025.

Staff Recommendation: Exempt from the groundwater sustainability fee because the landowner provided Statement of Water Diversion and Use documenting non-groundwater pumping.

13. APN: 034-511-008

Landowner: Tom Carlisle

TECHNICAL APPEAL

Date Received: June 2, 2026

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Appeal Claim:

No groundwater pumped during WY2025. Parcel has been dry-farmed since 2024.

Documentation Presented:

PG&E electricity records for pump.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
034-511-008	Olives	6.31	6.12	\$140.07

Staff Analysis:

PG&E documentation shows a significant reduction in power usage in May-Oct 2025 vs. the two years prior. The magnitude and timing of the reduction reasonably support the conclusion that the land was dry farmed during this period.

Staff Recommendation: Change the groundwater sustainability fee to zero (\$0) because the landowner provided sufficient evidence to demonstrate dry-farming.

14. APN: 026-104-061, 026-141-047, 026-141-048

Landowner: Anthony Silveira

**TECHNICAL APPEAL
(SOURCE)**

Date Received: June 4, 2026

Appeal Claim:

Parcels are irrigated using a riparian rights well (Statement S021216, Application A017360). Consumed water is surface water, not groundwater. Request correction of irrigated acreage.

Documentation Presented:

CalWATRS Statement S021216 — Active Riparian claim.

Fee/Use Data:

APN	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
026-104-061	9.00	8.67	\$198.59
026-141-047	7.65	12.57	\$287.74
026-141-048	23.46	20.11	\$460.57
TOTAL	40.11	41.35	\$946.90

Water Source Analysis:

Statement/License ID	Claim Type
S021216	Riparian (since 1963)

Staff Analysis:

Total Land IQ consumed use across all three parcels is 41.35 AF. WY2025 riparian diversion is greater than 41.35 AF, therefore, use is assumed to not be from Paso Basin.

Staff Recommendation: Exempt from groundwater sustainability fee because the landowner provided Statement of Water Diversion and Use documenting non-groundwater use. Staff have confirmed irrigated acres are correct.

15. APN: 015-053-016

Landowner: Greg Barr / Barr Creekside Vineyard

TECHNICAL APPEAL

Date Received: June 5, 2026

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Appeal Claim:

Two related claims: (1) All winery effluent is tank-treated, returned to ground with no evaporation, and solid waste is composted on-site — claims winery is a de minimis user. (2) Actual wine production in 2025 was 3,054 gallons, not the 26,000 gallons used in the water consumption calculation.

Documentation Presented:

Dept. of Treasury / TTB Report of Wine Premises Operations (Oct–Dec 2025, Barr Estate Winery, BWN-CA-16148) showing 3,054 gallons produced in 2025 by fermentation.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Commercial Use (AF)	Initial Fee
015-053-016	Grapes	43.93	44.39	0.08	\$1,018.41

Staff Analysis:

Commercial use: The TTB wine premise report shows 3,054 gallons produced (Oct–Dec 2025 quarterly), compared to 26,000 gallons apparently used in the fee calculation. Applied water calculation: 3,054 gal wine × 4 gal water/ gal wine = 12,216 gal water/yr ÷ 325,851 = 0.0374 AFY. Winery consumptive use: 0.0374 AFY × 25% = 0.009 AFY

Staff Recommendation: Change the groundwater sustainability fee to \$1,016.58 because landowner provided Department of the Treasury documentation sufficient to determine commercial use is 0 AF, resulting in total consumed use of 44.39 AF for the parcel.

16. APN: 033-331-044, 033-331-045, 033-331-046
(Previous APN:033-331-007)

Landowner: Victor & Leslie
Roberts

TECHNICAL APPEAL

Date Received: June 8, 2026

Appeal Claim:

Three separate claims: (1) 033-331-046 — Wells irrigating this parcel are located in the Atascadero Subbasin; requests removal. (2) 033-331-044 — Only 10 acres of irrigated grapes are within the Paso Basin; requests recalculation to reflect correct acreage. (3) 033-331-045 — Actual water usage is only 0.67 acre-feet per acre.

Documentation Presented:

Parcel map annotated with basin boundary and well locations; RWQCB report for APN 033-331-045.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
033-331-044	Grapes	20.66	18.77	\$429.81
033-331-045	Grapes	7.66	6.89	\$157.78
033-331-046	Grapes	25.70	20.86	\$477.74
TOTAL		54.02	46.52	\$1,065.33

Staff Analysis:

For APN 033-331-046, well GPS coordinates were reviewed against basin boundary and well locations were confirmed outside Paso Basin. For 033-331-044, fields irrigated with wells in Paso Basin are subject to the fee. For 033-331-045, grower states water usage is 0.67 AF per acre (8 in/ac) and Land IQ net ET is 6.9 AF (10.8 in/ac). Grower does not have a meter and water usage estimate was based on the hours of irrigation during the growing season. Calculations for the water usage were not provided. The net ET of 10.8 in/ac is reasonable for grapes in Paso Robles and with other vineyards in the subbasin.

Staff Recommendation: Change groundwater sustainability fee to \$587.61 because staff verified the well irrigating the crop on 033-331-046 does not draw from the Paso Robles Basin. No adjustment to consumed groundwater use on 033-331-045 because Land IQ determined documentation provided was not sufficient to support water use claim.

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No adjustment to consumed use on APN 033-331-044 because the well that irrigates the entire parcel is located in, and draws water from, the Paso Robles basin.

17. APN: 027-152-082

Landowner: Robert Erzen

TECHNICAL APPEAL

Date Received: June 7, 2026

Appeal Claim:

Parcel is dry-farmed with approximately 8-9 acres of grapes and olive trees. No drip lines, no irrigation infrastructure in place. Claims zero groundwater use and requests removal from fee.

Documentation Presented:

Written description of dry-farming practice.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
027-152-082	Olives, Grapes	12.53	7.33	\$167.87

Staff Analysis:

Grower states it is dry farmed. Grower should be informed that Land IQ relies on grower statements of dry farming because it does not have dry-farmed fields in their database and this correction will be carried forward.

Staff Recommendation: Change groundwater sustainability fee to zero (\$0) because Land IQ confirmed land was dry-farmed during water year 2025.

18. APN: 035-091-047

Landowner: Cristina Lea

TECHNICAL APPEAL

Date Received: June 8, 2026

Appeal Claim:

Vineyard has been ripped out. No ongoing water use on the parcel. Requests removal from fee assessment.

Documentation Presented:

No supporting documentation provided.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
035-091-047	Grapes	6.09	3.25	\$74.42

Staff Analysis:

Grower states vineyard has been removed, but is very difficult to see in imagery. ET is low for comparative fields in the Paso area. Landowner stated vineyard removal occurred in March / April 2026. Since the vineyard was removed after the 2025 WY, no adjustments are necessary. Field will be marked as removed for WY 2026.

Staff Recommendation: No change to the groundwater sustainability fee because portions of vineyards were removed outside the fee calculation period (Oct 1, 2024-Sep 30, 2025).

19. APN: 035-031-014

Landowner: Jean Rollins

NON-TECHNICAL APPEAL

PRAGA FY 2026-2027 Groundwater Fee Appeals Summary

Date Received: June 8, 2026

Appeal Claim:

Challenges the use of satellite ET data and parcel-level consumptive use calculations. Claims the methodology was not sufficiently disclosed to the public and that APN boundary application is inaccurate.

Documentation Presented:

No additional supporting documentation provided.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
035-031-014	Olives	1.65	2.27	\$52.00

Staff Analysis:

This appeal challenges the methodology itself rather than the groundwater consumed use for water year 2025.

Staff Recommendation: No change to the groundwater sustainability fee because the appeal does not raise a technical issue.

20. APN: 026-431-008

Landowner: James & Debra Saunders

TECHNICAL APPEAL

Date Received: June 8, 2026

Appeal Claim:

Landowners acquired this property in June 2024. All existing irrigation emitters were replaced with a new drip system at time of purchase. Claims WY2025 consumed use is grossly inaccurate. Landowners rotate crops between irrigated and non-irrigated annually.

Documentation Presented:

No additional supporting documentation provided.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
026-431-008	Grapes	44.18	34.79	\$796.69

Staff Analysis:

The Net ET was on the lower end of all Paso vineyards, and is consistent with expected irrigation for the crop. Landowner did not provide any additional data that would change this analysis.

Staff Recommendation: No change to the groundwater sustainability fee for this parcel because the initial consumed groundwater use data associated with the parcel was verified by Land IQ and there is no contravening evidence.

21. APN: 027-144-012

Landowner: James & Debra Saunders

TECHNICAL APPEAL (SOURCE)

Date Received: June 8, 2026

Appeal Claim:

This property does not use groundwater. It is irrigated using a historically established Riparian water source. Water usage as shown in the county report is grossly inaccurate. Crops are rotated between irrigated and non-irrigated annually.

Documentation Presented:

No additional supporting documentation attached.

Fee/Use Data:

PRAGA FY 2026-2027 Groundwater Fee Appeals Summary

APN	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Pond Evap. (AF)	Initial Fee
027-144-012	15.90	23.88	1.17	\$573.60

Water Source Analysis:

Statement/License ID	Claim Type
Not provided	Riparian (claimed)

Staff Analysis:

No SWRCB documentation has been provided. Without documentation, this appeal cannot be granted.

Staff Recommendation: No change to the groundwater sustainability fee because the landowner did not provide Statement of Water Diversion and Use documentation to support claim of non-groundwater use. However, the landowner may submit a request for refund if a surface water use (and not a groundwater basin use) is clearly demonstrated within a year of the fee assessment.

22. APN: 027-144-029	Landowner: James & Debra Saunders	NON-TECHNICAL APPEAL
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Date Received: June 8, 2026

Appeal Claim:

This property is leased to Cagliero Farms and is not irrigated by the owners. Landowner is appealing because they are not the party responsible for any irrigation on this parcel.

Documentation Presented:

No additional supporting documentation attached.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
027-144-029	Grapes	15.10	16.21	\$371.23

Staff Analysis:

Appeal is non-technical. Fees are assessed to the landowner of record, not the tenant.

Staff Recommendation: No change to the groundwater sustainability fee because fee recovery is handled between the landowner and the tenant.

23. APN: 020-011-056	Landowner: Steve Eorio	TECHNICAL APPEAL
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Date Received: June 3, 2026

Appeal Claim:

Disagreement with the ET-based assessment. Claims parcel is dry-farmed and that the groundwater use applied to the parcel is incorrect.

Documentation Presented:

No additional supporting documentation attached.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
020-011-056	Grapes	1.50	0.71	\$16.33

Staff Analysis:

PRAGA FY 2026-2027 Groundwater Fee Appeals Summary

Grower states vineyard is dry farmed. Satellite imagery show vegetation vigor is low and there was no imagery to confirm whether irrigation infrastructure was present. ET estimate was 5.7 in/ac which is at low end of the range relative to other vineyards in the subbasin. Grape canopy vigor, spacing, and understory vegetation indices are consistent with dry farm managed grapes. While most grapes are irrigated, dry farming grapes is a known practice that occurs in the Paso Robles basin and visual interpretation of available imagery is consistent with dry farming.

Staff Recommendation: Change groundwater sustainability fee to zero (\$0) because Land IQ confirmed land was dry-farmed during water year 2025.

24. APN: 026-183-001

Landowner: Steven Carter

TECHNICAL APPEAL

Date Received: June 8, 2026

Appeal Claim:

Property contains irrigated pistachio trees planted January 2020. Landowner tracks flow meter readings with dated photos at each irrigation event. States the WY2025 irrigation season began at a meter reading of 203.53 AF on 10/1/2024.

Documentation Presented:

Beginning and ending meter readings and photos (extracted use: 59.84 AF)

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
026-183-001	Pistachios	44.19	68.97	\$1,579.34

Staff Analysis:

For WY 2025, the grower's meter reading was 59.84 AF (16.2 in/ac). Land IQ net ET was 68.97 AF (18.7 in/ac). The difference of 15% is very close to the range of error of the model. Meter is a Seametrics mag meter installed in 2019 which appears to have an adequate straightpipe in the photo provided, and mag meters are generally considered more accurate than impeller style meters. Photos of meter readings matched the numbers provided by grower.

Staff Recommendation: Change groundwater sustainability fee \$1,370.34 because the landowner provided sufficient evidence to demonstrate consumed groundwater use totaling 59.84 AF.

25. APN: 027-144-002

Landowner: Bricen Cagliero

TECHNICAL APPEAL (SOURCE)

Appeal Claim:

The well on this parcel draws Salinas River riparian underflow under riparian right. The Draft Fee Study fails to distinguish applied surface water (riparian underflow) from groundwater. Requests: (1) PRAGA substantiate its methodology for excluding subterranean streamflow; (2) Additional time to apply the Garrapata four-part test.

Documentation Presented:

4-page legal letter from Downey Brand LLP and Cagliero Ranch parcel/block map.

Fee/Use Data:

APN	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
027-144-002	33.59	54.13	\$1,239.59

Water Source Analysis:

Statement/License ID	Claim Type
Riparian (no statement number provided)	Riparian (Salinas River underflow)

Staff Analysis:

PRAGA FY 2026-2027 Groundwater Fee Appeals Summary

No SWRCB documentation was provided. Without documentation, this appeal cannot be granted.

Staff Recommendation: No change to the groundwater sustainability fee because the landowner did not provide Statement of Water Diversion and Use documentation to support claim of non-groundwater use. However, the landowner may submit a request for refund if a surface water use (and not a groundwater basin use) is clearly demonstrated within a year of the fee assessment.

26. APN: 027-191-060, 027-191-067

Landowner: Jon Cagliero

TECHNCIAL APPEAL (SOURCE)

Date Received: June 8, 2026

Appeal Claim:

Irrigation blocks P8 (22.02 ac, APN 027-191-060) and P9 (38.84 ac, APN 027-191-067) are irrigated with Estrella Creek underflow water under California State Water Rights License 7729 (Application A017360, Permit 11613).

Documentation Presented:

State Water Rights Board License 7729; Cagliero Ranch parcel/block map.

Fee/Use Data:

APN	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
027-191-060	127.67	152.42	\$3,490.46
027-191-067	34.53	55.24	\$1,265.05
TOTAL		207.66	\$4,755.51

Water Source Analysis:

Statement/License ID	Claim Type
License 7729 (App. A017360 Permit 11613)	Appropriative (Estrella Creek underflow)

Staff Analysis:

The landowner provided the appropriate documentation for non-groundwater pumping and explained that only 22.68 of 127.67 acres in parcel 027-191-060 are irrigated with non-groundwater and all 34.53 acres in parcel 027-191-067 are irrigated with non-groundwater under CA Stater Water Rights License 7729

Staff Recommendation: Change groundwater sustainability fee to \$2,637.85 because the landowner provided Statement of Water Diversion and Use documenting non-groundwater pumping and staff was able to verify that 37.23 AF from APN 027-191-060 and 55.24 AF from APN 027-191-067 are a non-groundwater source of irrigation, therefore the fee should only be applied to 115.19 AF from APN 027-191-060.

27. APN: 027-381-006

Landowner: Jon Cagliero

TECHNCIAL APPEAL (SOURCE)

Date Received: June 8, 2026

Appeal Claim:

Irrigation block P10 (101.88 ac almonds) on APN 027-381-006 is irrigated with Salinas River underflow under Riparian Claim Statement S018453. WY2025 supplemental statement reports 249.9 AF applied under this riparian right.

Documentation Presented:

WY2025 Supplemental Statement S018453; Cagliero Ranch map.

Fee/Use Data:

APN	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
027-381-006	74.32	100.01	\$2,290.31

PRAGA FY 2026-2027 Groundwater Fee Appeals Summary

Water Source Analysis:

Statement/License ID	Claim Type
S018453	Riparian (Salinas River underflow, since 1964)

Staff Analysis:

Landowner provided the appropriate documentation to support non-groundwater use for its consumptive use calculation for WY 2025.

Staff Recommendation: Exempt from the groundwater sustainability fee because the landowner provided Statement of Water Diversion and Use documenting non-groundwater pumping.

28. 23 APNs Listed	Landowner: Cagliero Vineyards	TECHNCIAL APPEAL (SOURCE)
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Date Received: June 8, 2026

Appeal Claim:

16 of 23 parcels are supplied by nine wells drawing Salinas River underflow under riparian right, not groundwater. Three agricultural ponds on parcels 027-144-008, 027-143-006, and 027-143-012 are also filled by riparian underflow. The nine riparian wells supply irrigation blocks P2, P3, P4, P5, AP6, P7, 3A, 3B, 4, 2, 17, and 18. Requests PRAGA substantiate parcel-level groundwater calculations and additional time for Garrapata test consultant analysis.

Documentation Presented:

4-page legal letter from Downey Brand LLP with GPS coordinates for all 9 riparian wells; Cagliero Ranch Block and Field map with complete APN/block cross-reference table.

Fee/Use Data:

APN	WY2025 Consumed Use (AF)	Pond Evap. (AF)	Initial Fee
027-143-003	88.25	—	\$2,020.94
027-143-004	71.47	—	\$1,636.75
027-143-005	56.60	—	\$1,296.06
027-143-006	53.71	1.31	\$1,259.79
027-143-008	61.77	—	\$1,414.52
027-143-009	64.98	2.16	\$1,537.58
027-143-010	64.58	—	\$1,478.88
027-143-011	63.82	—	\$1,461.40
027-143-012	87.27	2.05	\$2,045.39
027-143-013	77.13	—	\$1,766.38
027-143-014	81.68	—	\$1,870.43
027-143-015	112.58	—	\$2,578.19
027-143-016	82.36	—	\$1,885.96
027-143-021	72.57	—	\$1,661.92
027-144-008	63.20	1.17	\$1,474.08
027-144-009	69.99	—	\$1,602.83
027-144-027	53.02	—	\$1,214.22
027-144-028	3.97	—	\$90.93
027-144-030	23.33	—	\$534.35
027-181-024	56.89	—	\$1,302.85

PRAGA FY 2026-2027 Groundwater Fee Appeals Summary

027-181-035	60.72	—	\$1,390.39
027-191-060	152.42	—	\$3,490.46
027-381-019	4.52	—	\$103.40
TOTAL	1,526.83		\$35,117.70

Water Source Analysis:

Statement/License ID	Claim Type
Multiple riparian statements (Salinas River underflow)	Riparian
Riparian (claimed)	Riparian (pond-filled)

Staff Analysis:

No SWRCB documentation has been provided. Without documentation, this appeal cannot be granted.

Staff Recommendation: No change to the groundwater sustainability fee because the landowner did not provide Statement of Water Diversion and Use documentation to support claim of non-groundwater use. However, the landowner may submit a request for refund if a surface water use (and not a groundwater basin use) is clearly demonstrated within a year of the fee assessment.

29. APN: Not specified

Submitter: Wells Fargo Bank (Eric J. Redeker)

NON-TECHNICAL APPEAL

Date Received: June 8, 2026

Appeal Claim:

Formal legal challenge letter: (1) Proposition 26 authority is improper — because the Paso Robles GSP was adopted and approved by DWR in 2023, the fee must comply with Proposition 218 requirements, not the Prop 26 regulatory fee standard; (2) Retroactive application — the fee is based on WY2025 data collected before landowners had notice of the fee or its methodology, making it unfair to hold landowners liable for decisions (planting, irrigation) made without knowledge of future fees; (3) Requests PRAGA halt implementation, recalculate using 2026 land use data, and provide a transition period before any fee is imposed.

Documentation Presented:

No documentation provided.

Staff Analysis:

This appeal does not contest the consumed use data but challenges the legal authority and procedural basis for the fee program.

Staff Recommendation: No change to the groundwater sustainability fee because the appeal did not contest the consumed groundwater use.

30. APN: 043-241-004

Landowner: Noel Ryan

NON-TECHNICAL APPEAL

Date Received: June 8, 2026

Appeal Claim:

40 acres leased out and the irrigation well is not on this parcel.

Documentation Presented:

No documentation provided.

Fee/Use Data:

APN	Crop	Irrigated Area (ac)	WY2025 Consumed Use (AF)	Initial Fee
043-241-004	Grapes	41.48	57.79	\$1,323.41

Staff Analysis:

The appeal is non-technical and does not contest the consumed groundwater use.

Staff Recommendation: No change to the groundwater sustainability fee because fee recovery is handled between owner and lessee.