



CALIFORNIA DEPARTMENT OF WATER RESOURCES

SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

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June 1, 2026

Sherry Shaw
Walnut Valley Water District
271 S. Brea Canyon Rd
Walnut, CA 91789
sshaw@walnutvalleywater.gov

RE: Approved Determination of the Re-submitted Groundwater Sustainability Plan for the San Gabriel Valley Basin – “Spadra Basin”

Dear Sherry Shaw,

The Department of Water Resources (Department) has evaluated the groundwater sustainability plan (GSP or Plan) for an unadjudicated portion of the San Gabriel Valley Basin (Basin) referred to in the Plan as the “Spadra Basin” that was re-submitted in response to the Department’s incomplete determination on April 28, 2025. The Department has determined that the re-submitted Plan is approved based on the recommendation from the Staff Report, included as an exhibit to the attached Statement of Findings, which describes that the Plan has taken sufficient action to correct the deficiency identified by the Department in the incomplete determination.

Recognizing SGMA sets a long-term horizon for groundwater sustainability agencies (GSAs) to achieve their basin sustainability goals, monitoring progress is fundamental for successful implementation. GSAs are required to evaluate their GSPs at least every five years and whenever the Plan is amended, and to provide a written assessment to the Department. Accordingly, the Department will evaluate approved GSPs and issue an assessment at least every five years. The Spadra Basin GSA is required to submit its periodic evaluation of the San Gabriel Valley Basin – “Spadra Basin” GSP no later than July 26, 2027.

Please contact Sustainable Groundwater Management staff by emailing sgmps@water.ca.gov if you have any questions related to the Department’s assessment or implementation of your GSP.

Thank You,

Paul Gosselin

Paul Gosselin
Deputy Director
Sustainable Water Management

Attachment:

1. Statement of Findings Regarding the Determination of Approval Status of the San Gabriel Valley Basin Groundwater Sustainability Plan

STATE OF CALIFORNIA DEPARTMENT OF WATER RESOURCES

STATEMENT OF FINDINGS REGARDING THE APPROVAL OF THE SAN GABRIEL VALLEY BASIN GROUNDWATER SUSTAINABILITY PLAN

This Statement of Findings explains the Department's decision regarding the Plan resubmitted by the Spadra Basin Groundwater Sustainability Agency (GSA or Agency) for the very low-priority San Gabriel Valley Basin (Basin No. 4-013) on November 26, 2025 (referred to as 2025 GSP or 2025 Plan).

Under the Sustainable Groundwater Management Act (SGMA or Act), the Department of Water Resources (Department) is required to evaluate whether a submitted groundwater sustainability plan (GSP or Plan) conforms to specific requirements of SGMA, substantially complies with the Department's GSP Regulations, is likely to achieve the sustainability goal for the basin covered by the Plan, and whether the Plan adversely affects the ability of an adjacent basin to implement its GSP or impedes achievement of sustainability goals in an adjacent basin.¹ If a Plan is determined to be Incomplete, the Department must identify deficiencies that precluded approval of the Plan and identify corrective actions required to address those deficiencies. SGMA does not mandate, but encourages, low- and very low-Priority basins to be managed under a GSP. Unlike high- and medium-priority basins, which must resolve deficiencies that lead to an incomplete determination within 180 days,² GSAs in low- or very low-priority basins, such as San Gabriel Valley Basin, do not have a specific time limit in which to address deficiencies that render the Plan Incomplete.³ When evaluating a revised GSP that was determined to be incomplete, the Department reviews the materials provided by the GSA (e.g., revised or amended GSP) that are intended to address the deficiencies that precluded approval of the Plan and makes one of the following determinations:

1. Approved, if the Department determines the Agency has taken sufficient action to address those deficiencies. The Department may also evaluate other components of the Plan, particularly to assess whether and, if so, how revisions to address deficiencies may have affected other components of the Plan or its likelihood of achieving sustainable groundwater management.
2. Inadequate, if the Agency has not taken sufficient action to address the deficiencies previously identified by the Department. However, low and very low-priority basins are not subject to state intervention under Chapter 11 of SGMA, and

¹ Water Code § 10733.

² 23 CCR § 355.2(e)(2)(B)

³ 23 CCR § 355.2(e)(B)(iii).

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June 1, 2026

GSAs in these basins therefore have additional time and opportunity to locally address Plan deficiencies that will put the basin on a path towards sustainable groundwater management.

This Statement of Findings explains the Department's decision regarding the Plan resubmitted by the Spadra Basin Groundwater Sustainability Agency (GSA or Agency) for the very low-priority San Gabriel Valley Basin (Basin No. 4-013) on November 26, 2025 (referred to as 2025 GSP or 2025 Plan).

Department management have discussed the 2025 Plan and have reviewed the written assessment titled Reassessment of Incomplete Groundwater Sustainability Plan 2026 Staff Report (Staff Report), attached as Exhibit A, which recommends approval of the 2025 Plan. Department staff have conducted a thorough evaluation and assessment of the 2025 Plan and, after review and in reliance on those staff analyses, Department management concurs with staff's recommendation. The Department therefore **APPROVES** the 2025 Plan and makes the following findings:

- A. On July 26, 2022, the GSA submitted a GSP (referred to as the 2022 GSP or 2022 Plan) for the Department's evaluation.
- B. On April 28, 2025, the Department issued a Staff Report (referred to as Incomplete Determination) and Findings determining the 2022 GSP to be incomplete, because the 2022 GSP did not satisfy certain requirements of SGMA, nor did it substantially comply with the GSP Regulations. The Department's Incomplete Determination identified the following deficiency that precluded approval and provided the GSA with corrective actions that were intended to address the deficiency.
 1. Deficiency 1. The 2022 GSP did not effectively cover the entire Basin (excluding the adjudicated areas) in a manner consistent with SGMA nor demonstrate that areas within the San Gabriel Valley Basin that are not covered by an adjudication and are outside the area covered by the Plan (i.e., the area locally referred to as the "Spadra Basin") will be effectively managed and that undesirable results will be avoided throughout the entire San Gabriel Valley Basin.
- C. On November 26, 2025, the GSA submitted a revised Plan (the 2025 GSP or 2025 Plan) to the Department. As further explained in staff's thorough evaluation and assessment of the 2025 GSP, the Department finds:
 1. The Agency has taken sufficient action to correct Deficiency 1, such that, at this time, the Department no longer finds this deficiency to preclude approval. The 2025 GSP has included information that sufficiently demonstrates that the areas within the San Gabriel Valley Basin not covered by an adjudication and outside the area covered by the Plan are not likely to affect the sustainability (and will avoid undesirable results) for the San Gabriel Valley Basin.

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Accordingly, the 2025 GSP submitted by the Spadra Basin GSA for the San Gabriel Valley Basin is hereby **APPROVED**. The recommended corrective actions provided for the 2022 GSP will assist the Department's future review of the Plan's implementation for consistency with SGMA. Therefore, the Department recommends the Spadra Basin GSA address the recommended corrective actions in the next Periodic Evaluation, which is set to be submitted by July 26, 2027, as required by Water Code § 10733.8. Failure to address the Department's recommended corrective actions before future, subsequent plan evaluations may lead to a Plan being determined incomplete or inadequate.

Signed:

Paul Gosselin

Paul Gosselin, Deputy Director – Sustainable Water Management
Date: June 1, 2026

Exhibit A: Reassessment of Incomplete Groundwater Sustainability Plan 2026 Staff Report – San Gabriel Valley Basin, June 1, 2026.

State of California

Department of Water Resources

Sustainable Groundwater Management Program

Reassessment of Incomplete

Groundwater Sustainability Plan

2026 Staff Report

Groundwater Basin Name:	San Gabriel Valley (No. 4-013)
Submitting Agency:	Spadra Basin Groundwater Sustainability Agency
Submittal Type:	Revised GSP in Response to Incomplete Determination
Submittal Date:	November 26, 2025
Recommendation:	Approved
Date:	June 1, 2026

On November 26, 2025, the Spadra Basin Groundwater Sustainability Agency (GSA or Agency) resubmitted the groundwater sustainability plan (2025 GSP or 2025 Plan) for an unadjudicated portion of the very low priority San Gabriel Valley Basin (Basin) to the Department of Water Resources (Department or DWR) for evaluation and assessment as required by the Sustainable Groundwater Management Act (SGMA)¹ and GSP Regulations.² The resubmittal is in response to the Department's April 28, 2025 "incomplete" determination of the initial GSP (2022 GSP or 2022 Plan).³ Changes made in the resubmitted 2025 Plan were ratified at the GSA's executive committee meeting held on May 19, 2026.

➤ ***Based on the evaluation of the 2025 Plan, Department staff recommend the Plan be approved.***

After evaluation and assessment, Department staff conclude the GSA has taken sufficient action to correct the deficiency identified by the Department and recommend approval of the Plan; however, Department staff provided additional recommended corrective actions in the initial assessment that the GSA should consider addressing by the Plan's first periodic evaluation.

Overall, Department staff believe the 2025 Plan contains the required components of a GSP, demonstrates a thorough understanding of the Basin based on what appears to be the best available science and information, sets well explained, supported, and reasonable sustainable management criteria to prevent undesirable results as defined in the 2025 Plan, and proposes a set of projects and management actions that, if

¹ Water Code § 10720 *et seq.*

² 23 CCR § 350 *et seq.*

³ Incomplete Determination, <https://sgma.water.ca.gov/portal/service/gspdocument/download/11149>.

successfully implemented, are likely to achieve the sustainability goal defined for the Basin.⁴ Department staff will continue to monitor and evaluate the Basin's progress toward achieving the sustainability goal through annual reporting and future periodic evaluations of the Plan and its implementation.

This assessment includes four sections:

- **Section 1 – Evaluation Criteria**: Describes the legislative requirements and the Department's evaluation criteria.
- **Section 2 – Required Conditions**: Describes the submission requirements of an incomplete resubmittal to be evaluated by the Department.
- **Section 3 – Deficiency Evaluation**: Provides an assessment of whether and how the contents included in the GSP submittal addressed the deficiency identified by the Department in the initial incomplete determination.
- **Section 4 – Staff Recommendation**: Includes the staff recommendation for the resubmitted Plan.

1 EVALUATION CRITERIA

The Department evaluates whether a Plan conforms to certain statutory requirements of SGMA⁵ and is likely to achieve the basin's sustainability goal,⁶ whether evaluating a basin's first Plan,⁷ a Plan previously determined incomplete,⁸ an amended Plan,⁹ or a GSA's periodic evaluation to an approved Plan.¹⁰ To achieve the sustainability goal, each version of the Plan must demonstrate that implementation will lead to sustainable groundwater management, which means the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results.¹¹ The Department is also required to evaluate, on an ongoing basis, whether the Plan will adversely affect the ability of an adjacent basin to implement its groundwater sustainability program or achieve its sustainability goal.¹²

The Plan evaluated in this Staff Report was previously determined to be incomplete. An incomplete Plan is one which had one or more deficiencies that precluded its initial approval, may not have had supporting information that was sufficiently detailed or analyses that were sufficiently thorough and reasonable, or Department staff determined it was unlikely the GSA in the basin could achieve the sustainability goal. For jurisdictional

⁴ 23 CCR § 354.24.

⁵ Water Code §§ 10727.2, 10727.4, 10727.6.

⁶ Water Code § 10733; 23 CCR § 354.24.

⁷ Water Code § 10720.7.

⁸ 23 CCR § 355.2(e)(2).

⁹ 23 CCR § 355.10.

¹⁰ 23 CCR § 355.6.

¹¹ Water Code § 10721(v).

¹² Water Code § 10733(c).

(high- and medium-priority) basins, GSAs are provided up to 180 days to sufficiently address or resolve deficiencies that lead to an Incomplete determination before the Department will make a subsequent determination of adequate or inadequate (23 CCR § 355.2(e)(2)(B));¹³ however, GSAs in non-jurisdictional (low- and very low-priority) basins do not have a specific time limit in which to address plan deficiencies that have led to an plan Incomplete determination before the Department makes a determination of adequate or inadequate (23 CCR § 355.2(e)(B)(ii)).¹⁴ Based on the GSA's efforts, the Department can either approve¹⁵ the Plan or determine the Plan inadequate.¹⁶

The Department's evaluation and assessment of a Plan previously determined to be incomplete, as presented in this Staff Report, continues to follow Article 6 of the GSP Regulations¹⁷ to determine whether the Plan, with revisions or additions prepared by the GSA, complies with SGMA and substantially complies with the GSP Regulations.¹⁸ As stated in the GSP Regulations, "substantial compliance means that the supporting information is sufficiently detailed and the analyses sufficiently thorough and reasonable, in the judgment of the Department, to evaluate the Plan, and the Department determines that any discrepancy would not materially affect the ability of the Agency to achieve the sustainability goal for the basin, or the ability of the Department to evaluate the likelihood of the Plan to attain that goal."¹⁹

The recommendation to approve a Plan previously determined to be incomplete does not signify that Department staff, were they to exercise the professional judgment required to develop a Plan for the basin, would make the same assumptions and interpretations as those contained in the revised Plan, but simply that Department staff have determined that the modified assumptions and interpretations relied upon by the submitting GSA(s) are supported by adequate, credible evidence, and are scientifically reasonable. The assessment of a Plan previously determined to be incomplete may involve the review of new information presented by the GSA, including models and assumptions, and an evaluation of that information based on scientific reasonableness. In conducting its assessment, Department staff does not recalculate or reevaluate technical information or perform its own geologic or engineering analysis of that information.

The recommendation to not approve a Plan previously determined to be incomplete and instead determine it to be inadequate signifies that the resubmitted Plan contains significant deficiencies based on one or more of the criteria identified in 23 CCR § 355.4(b), or the GSA in the basin have not taken sufficient actions to correct the deficiencies previously identified by the Department when it found the Plan incomplete. A Plan for jurisdictional (high- and medium-priority) basins determined to be inadequate is

¹³ 23 CCR § 355.2(e)(2)(B).

¹⁴ 23 CCR § 355.2(e)(2)(B)(ii).

¹⁵ 23 CCR §§ 355.2(e)(1).

¹⁶ 23 CCR §§ 355.2(e)(3).

¹⁷ 23 CCR § 355 *et seq.*

¹⁸ 23 CCR § 350 *et seq.*

¹⁹ 23 CCR § 355.4(b).

subject to the state intervention provisions contained in Chapter 11 of SGMA.²⁰ Non-jurisdictional basins (low- and very low-priority) are not subject to state intervention under Chapter 11 of SGMA.²¹

2 REQUIRED CONDITIONS

When the Department determines a Plan to be incomplete, the Department's assessment identifies required corrective actions that address minor or potentially significant deficiencies that the Department identified in the initially submitted Plan. The GSA(s) in a basin, whether developing a single GSP covering the basin or multiple GSPs, must attempt to sufficiently address those required corrective actions for the Plan to be reevaluated by the Department and potentially approved.

2.1 INCOMPLETE RESUBMITTAL

GSP Regulations specify that the Department shall evaluate a resubmitted GSP in which the GSA has taken measures to address the Department's corrective actions.²² The GSP Regulations do not impose a timeline for GSAs in low- and very-low priority basins to address corrective actions associated with an incomplete determination.²³

The Department issued the incomplete determination for the unadjudicated portion of the very low-priority San Gabriel Valley Basin on April 28, 2025.²⁴ The Spadra Basin GSA resubmitted the GSP to the Department on November 26, 2025.

The GSA has provided a redline/strikeout version of the resubmitted GSP. The redline/strikeout version highlights the changes made from the initial 2022 submission to the 2025 submission.²⁵

²⁰ Water Code § 10735 *et seq.*

²¹ Water Code § 10720.7(b).

²² 23 CCR § 355.4(a)(4).

²³ 23 CCR § 355.2(e)(2)(B)(ii).

²⁴ Incomplete Determination, <https://sgma.water.ca.gov/portal/service/gspdocument/download/11149>.

²⁵ <https://sgma.water.ca.gov/portal/service/gspdocument/download/11675>.

3 DEFICIENCY EVALUATION

As stated in Section 355.4 of the GSP Regulations, a basin “shall be sustainably managed within 20 years of the applicable statutory deadline consistent with the objectives of the Act.” The Department’s assessment is based on a number of related factors including whether the elements of a GSP were developed in the manner required by the GSP Regulations, whether the GSP was developed using appropriate data and methodologies and whether its conclusions are scientifically reasonable, and whether the GSP, through the implementation of clearly defined and technically feasible projects and management actions, is likely to achieve a tenable sustainability goal for the basin.

In the initial incomplete determination of the 2022 Plan, the Department identified one deficiency relating to Plan coverage of the San Gabriel Valley Basin, which precluded approval of the 2022 Plan.²⁶ Consistent with the GSP Regulations, Department staff are providing an evaluation of the resubmitted Plan to determine if the GSA has taken sufficient action to correct the deficiency identified in the 2022 Plan.

3.1 DEFICIENCY 1. THE GSP DOES NOT COVER THE ENTIRE BASIN AS REQUIRED BY SGMA.

3.1.1 Corrective Action

As described in the Department’s GSP Assessment Staff Report released on April 28, 2025, Department staff determined that the GSP did not cover the entire basin as required by SGMA. As a result, the Department provided the following corrective actions for the basin to consider and address:

The GSA should clearly explain how the GSP covers the entire San Gabriel Valley Basin. If the GSA believes the areas not covered by the Plan and not covered by an adjudication to in fact be adjudicated, that should be substantiated in the GSP.

Should those areas in Figure 1 not be adjudicated, the GSA should provide an explanation for how the non-adjudicated areas within the larger San Gabriel Valley Basin will not affect the sustainability (and will avoid undesirable results) for the San Gabriel Valley Basin as a whole given it is outside the jurisdiction of the GSA. Furthermore, the GSA should disclose if and what beneficial uses and users of groundwater are present in those areas and describe how those interests have been considered in the GSP or, if covered by an adjudication action, if those areas are supplied with water pumped from within one of the adjudicated areas.

²⁶ Incomplete Determination, <https://sgma.water.ca.gov/portal/service/gspdocument/download/11149>.

3.2 EVALUATION OF RESUBMITTED PLAN

The 2025 GSP includes (in Appendix I)²⁷ information that clearly identifies which areas of the San Gabriel Valley Basin are not included in the Plan area nor covered by an adjudication action. The 2025 GSP also includes information that explains or justifies why the non-adjudicated areas of the San Gabriel Basin not included in the Plan area will not affect the sustainability for the San Gabriel Valley Basin as a whole.

The San Gabriel Valley Basin consists of four areas locally referred to as “Puente Basin,” “Main San Gabriel Basin,” “Six Basins,” and “Spadra Basin.” Except for the “Spadra Basin,” all these areas are adjudicated.²⁸ The 2025 GSP identifies 15 areas along the perimeter of the San Gabriel Valley Basin that are outside the adjudicated boundaries of the “Puente Basin,” “Main San Gabriel Basin,” and “Six Basins,” and are also outside the Spadra Basin GSA’s jurisdictional boundary. These perimeter areas (or fringe areas) are not located near the “Spadra Basin” boundary; they are located along the outermost edges of the adjudicated basins (i.e., “Puente Basin,” “Main San Gabriel Basin,” and “Six Basins”).²⁹ The 2025 GSP explains that these fringe areas, which are neither covered by an adjudication action nor the GSP, will not affect the sustainability (and will avoid undesirable results) for the San Gabriel Valley Basin as a whole because of the following reasons:³⁰

- There is no groundwater pumping occurring in the fringe areas of the San Gabriel Valley Basin.
- The aquifer in 14 of the identified fringe areas is primarily composed of impermeable bedrock and/or thin aquifer units with limited storage and transmissivity; the remaining fringe area is within a fault boundary that restricts groundwater flow.
- In most of the fringe areas where there is water service, the supplying agency is a party to the Watermaster for the adjudicated basin and therefore participates in management and monitoring of the area as needed.
- Although some fringe areas may show hydraulic connectivity to the adjacent adjudicated basin, the aquifer systems in all of the 15 fringe areas identified are “considered hydraulically insignificant and do not justify inclusion in monitoring or modeling efforts by the Watermasters or others. Although some of these fringe areas partially overlap with the Watermaster model domains.”³¹

²⁷ 2025 Spadra Basin GSP, Appendix I, pp. 371-382.

²⁸ 2025 Spadra Basin GSP, Section 1.1, p. 373.

²⁹ 2025 Spadra Basin GSP, Section 2, p.374.

³⁰ 2025 Spadra Basin GSP, Appendix I, Section 4.0, p. 380, and Table 1, p. 381.

³¹ 2025 Spadra Basin GSP, Appendix I, Section 4.0, p. 380.

3.2.1 Conclusion

Staff conclude that the GSA has taken sufficient action to address the identified deficiency. The 2025 GSP includes information that clarifies and identifies the perimeter areas of the San Gabriel Valley Basin that are not covered by an adjudication action and are outside the Plan area boundary; information that shows that no groundwater pumping occurs in these perimeter areas; and information regarding the hydrogeologic properties of these perimeter areas to explain limited storage and transmissivity properties. Staff believe this new information included in the 2025 GSP sufficiently supports the GSA's rationale that these areas are unlikely to affect the management and achievement of sustainability goals (and will avoid undesirable results) for the San Gabriel Valley Basin.

4 STAFF RECOMMENDATION

Department staff believe that the GSA has taken sufficient action to address the deficiency identified in the 2022 GSP. Department staff recommend **APPROVAL** of the 2025 GSP.

Department staff also evaluated components of the 2022 GSP in the initial assessment³² that did not preclude approval and provided recommended corrective actions that the GSA should consider addressing by the first periodic evaluation of the Plan, no later than July 26, 2027. Addressing those recommended corrective actions will be important to demonstrate that implementation of the Plan is likely to achieve the sustainability goal for the Basin.

³² 2022 GSP Determination, <https://sgma.water.ca.gov/portal/service/gspdocument/download/11149>.