

Gravelly Ford Water District Board of Directors

June 25, 2025

1516 Howard Rd.
Ste 324
Madera, CA 9367

Re: Annexation Proposal from Gravelly Ford Sphere of Influence Growers

Dear Board Members,

We, the undersigned landowners comprising the Gravelly Ford Sphere of Influence Group, respectfully request your consideration for annexation into the Gravelly Ford Water District. We recognize annexation is a discretionary decision of the Board and appreciate the District's responsibility to evaluate such requests in the context of long-term benefits to its current members and its regulatory obligations under SGMA.

Our group acknowledges the increasing complexity and burden placed on the District to achieve and maintain groundwater sustainability, particularly as SGMA compliance demands grow. As such, we believe our proposed annexation offers a meaningful and financially responsible path to mutual benefit.

In exchange for all rights afforded to existing District members, we propose:

1. A buy-in of \$3,000 per annexed acre, paid by land owner, evenly over a 5 to 10-year period.
2. Permanent connection to District waterways at the landowner's expense within five (5) years of annexation. All necessary turnouts and infrastructure to be installed and maintained at the landowner's expense.
3. In high river flow years, the group agrees to divert water off-system and participate in reasonable recharge efforts when requested, helping reduce system pressure and contributing to basin health.

We believe this proposal strengthens the District's SGMA posture, provides a fair and steady income stream, and promotes system flexibility during wet years. Most importantly, it aligns with the District's long-term vision of proactive, sustainable water management.

We would welcome the opportunity to present our proposal in person and answer any questions you may have.

Sincerely,

The Gravelly Ford Sphere of Influence Group

Signatures:

Printed Name: Brian Davis

Signature: Brian Davis

Date: 7/10/25

Printed Name: JACK AULAKH

Signature: [Handwritten Signature]

Date: 7/9/25

Printed Name: Wyatt Emmert

Signature: [Handwritten Signature]

Date: 7-9-25

Printed Name: ~~Grace T. Naito~~ Grace T. Naito

Signature: Grace T. Naito

Date: 7-9-25

Printed Name: Abraham S. Aulakh

Signature: Abraham-S-Aulakh

Date: 7-11-25



August 6, 2025

Gravelly Ford Water District's Board of Directors
1516 Howard Road, Suite 324
Madera, CA 93637

Re: *G3 Enterprises' Ripperdan Ranch - Request for Annexation*

Dear Board Members:

This is to request your consideration for annexation of the non-annexed portion of G3 Enterprises' Ripperdan Ranch into the Gravelly Ford Water District. Ripperdan Ranch is in Madera County and comprises approximately 2,769 acres, of which approximately 1,957 acres are within Gravelly Ford Water District (GFWD). We are requesting annexation of the remainder of the Ranch, approximately 812 acres ("subject lands")¹. The subject lands are adjacent to the GFWD boundary as shown on the attached map.

The subject lands are planted to vineyards and are irrigated from existing groundwater wells. G3 Enterprises does not plan to alter its historic practice of using its groundwater wells to irrigate these lands. To the extent GFWD has excess water in some years, that water would be used for irrigation and groundwater recharge purposes on the 812 acres requested for annexation. Ripperdan Ranch has no expectation of GFWD canal deliveries in normal year types. Additionally, all the required infrastructure is in place for groundwater recharge of the subject lands when excess surface water is made available by GFWD. With this annexation, GFWD's groundwater recharge area would be increased by about 10%, allowing more water to be recharged to GFWD during periods of high flow.

G3 Enterprises understands that the requested annexation will require approval from the Madera County Local Agency Formation Commission to increase the GFWD sphere of influence

¹ Specifically, Madera County Assessor Parcels 040-055-001 and 040-055-012.

boundary. Further, minor changes to the GFWD's pending Groundwater Sustainability Plan will also be required. In addition to a benefit in net revenue to GFWD, this requested annexation would also allow GFWD to increase groundwater recharge, without GFWD having to impact its current water budget. The attached Memorandum from Wagner & Bonsignore Engineers dated June 16, 2025, discusses this in more detail.

We appreciate your consideration of this request for annexation of the remainder of lands in Ripperdan Ranch. We would be happy to meet with you and/or your General Manager Don Roberts to further discuss this request for annexation.

Very truly yours,

A handwritten signature in blue ink that reads "Parm Dhaliwal". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Parm Dhaliwal, Director of Operations
Gallo Vineyards, Inc.

cc: Don Roberts, General Manager GFWD
Tim Byrd, G3 Enterprises

Wagner & Bonsignore

Consulting Civil Engineers, A Corporation

Nicholas F. Bonsignore, P.E.
Robert C. Wagner, P.E.
Paula J. Whealen

Martin Berber, P.E.
Patrick W. Ervin, P.E.
David P. Lounsbury, P.E.
Vincent Maples, P.E.
Leah Orloff, Ph.D., P.E.
David H. Peterson, C.E.G., C.H.G.
Ryan E. Stolfus

MEMORANDUM

To: Parm Dhaliwal, Gallo Vineyards Inc. and Tim Byrd, G3 Enterprises, Inc.

From: Robert C. Wagner, P.E. and Paula J. Whealen

Date: June 16, 2025

Re: *G3 Enterprises' Ripperdan Ranch - Request for Annexation*

You requested our review of the November 15, 2022 Memorandum (attached as **Exhibit 1**) from Garth Pecchenino at QK Engineering responding to G3 Enterprises' request for annexation of a portion of its Ripperdan Ranch to Gravelly Ford Water District (GFWD). Ripperdan Ranch (Ranch) is located in Madera County and comprises approximately 2,769 acres, of which approximately 1,957 acres are within GFWD. In 2022, G3 Enterprises requested GFWD annex the remainder of the Ranch, approximately 812 acres ("subject lands")¹. The subject lands are adjacent to the GFWD boundary (see attached **Exhibit 2**).

Mr. Pecchenino's Memorandum suggested that the requested annexation could impact GFWD as it could limit the allocation of surface water to the other lands within GFWD. The purpose of this Memorandum is to respond to the issues raised by Mr. Pecchenino.

We understand that all of the Ripperdan Ranch lands were planted to vineyards in the 1980's and are irrigated via drip irrigation from existing groundwater wells. The current vineyard irrigation system on the Ranch has the ability to flood the subject lands for recharging the groundwater aquifer. However, the subject lands do not have a surface water supply. When surface water was made available from the GFWD canal, the Ranch lands within the GFWD were flooded for irrigation and recharge.

You have stated that if the subject lands are annexed to GFWD, G3 Enterprises intends to continue using only its existing groundwater supplies for irrigation of the subject lands. Only to the extent that GFWD had sufficient supply, would surface water be diverted from the GFWD canal.

¹ Specifically, Madera County Assessor Parcels 040-055-001 and 040-055-012.

Madera Subbasin 2025 Joint Groundwater Sustainability Plan

The entire Ripperdan Ranch is within the Madera Subbasin as defined by the California Department of Water Resources (DWR) Bulletin 118. The Madera Joint Groundwater Sustainability Plan (Joint GSP) established a water budget for the Subbasin based on known water demands for all lands, and measured surface water deliveries. Since groundwater diversion records were generally unavailable, groundwater extractions were inferred from the individual demands, less surface water and runoff. Groundwater use was essentially calculated as a water budget “closure” amount. The Madera Subbasin was divided into seven separate Groundwater Service Areas (GSA). GFWD is one of the seven GSAs (as shown on **Exhibit 3**). A water budget was developed for each of the seven GSAs utilizing this Subbasin data, and did not represent actual groundwater demands of each GSA.

Gravelly Ford Water District’s 2025 Groundwater Sustainability Plan

The GFWD’s GSP encompasses approximately 8,300 acres within the Madera Subbasin and its boundary is coterminous with the GFWD boundary. The GFWD’s GSP utilized the accounting methods of the Madera Subbasin Joint GSP for determining its water budget. Further, the GSP states that the GSA lands are recharged from infiltration of precipitation and applied water, streamflow percolation and other sources flowing from the southeast to northwest across the GSA from adjacent lands.

The Ripperdan Ranch’s subject lands are located adjacent and southeast of the GFWD boundary. The subject lands’ water demand on GFWD’s GSA remains the same, whether the lands are within or outside of the GFWD boundary (the lands are not moving). There is no identified physical barrier to water movement between GFWD lands and the subject lands. If the subject lands are annexed, there would be no actual increase in groundwater demands, only a change in the GSP accounting for the subject lands.

Ripperdan Ranch’s Water Use

As stated herein, Ripperdan Ranch relies on diversion from its groundwater wells to serve the irrigation demands of the subject lands. There have been only a few times in the past ten years when surface water in the GFWD canal was made available to Ripperdan Ranch for use on its lands within GFWD.

As stated herein, we understand that G3 Enterprises does not plan to alter its historic practice of using its groundwater wells to irrigate lands within GFWD and outside of GFWD. Ripperdan Ranch demands were included in the Madera Subbasin Joint GSP and factored into the Gravelly Ford GSP.

The Ripperdan Ranch’s water use for 2023 and 2024 is set forth below:

Year	Applied Water Demand for Lands within GFWD	Applied Water Demand for Subject Lands Outside GFWD
2023	1,846 Planted Acres	773 Planted Acres
	3,564 Acre-Feet	1,274 Acre-Feet
	1.98 AF/Acre	1.65 AF/Acre
2024	1,240 Planted Acres	703 Planted Acres
	2,706 Acre-Feet	1,231 Acre-Feet
	2.18 AF/Acre	1.75 AF/Acre

As shown above, the Ripperdan Ranch’s applied water use for the subject lands has been an average of 1.7 acre-feet per acre (AFA). The evapotranspiration of applied water (ETAW) was determined to be 2.16 AFA in the GFWD GSP, and 2.44 AFA in the Madera Joint GSP. The applied water use in the GFWD and Madera Joint GSPs would be even higher (2.7 AFA and 3.05 AFA respectively) using an 80% irrigation efficiency.² Therefore, the subject lands’ groundwater demand is 37% less than what is allocated in the GSPs. The foregoing indicates that the groundwater demands used for the GFWD GSP are higher than the actual applied water of the Ripperdan Ranch lands.

Requested Annexation Summary of Issues

Our response to Mr. Pecchenino’s November 15, 2022 Memorandum summary points (**Exhibit 1**) are set forth below:

- 1. Does the annexation of the property help the District?*

The annexation is a benefit to the GFWD. We see this annexation to be a net benefit in revenue and groundwater recharge amounts, without GFWD having to impact its current water budget.

- The added annual revenue from assessments of the additional lands will benefit GFWD financially.
- To the extent the GFWD does have excess water in some years to provide to the subject lands, that water could be used for irrigation and groundwater recharge purposes on the 812 additional acres.
- All of the required infrastructure is in place for groundwater recharge of the subject lands when excess surface water is made available by GFWD.
- With the annexation, GFWD’s groundwater recharge area will be increased by about 10%, allowing more water to be recharged to GFWD during periods of high flow.

² Gravelly Ford Water District Groundwater Sustainability Plan, January 2025, Page 5-2.

- The subject lands will only use GFWD surface water when it is made available.
- In 2023 approximately 1,000 acre-feet of excess surface water was made available from GFWD for irrigation and recharge of Ripperdan Ranch lands within GFWD, as shown on attached **Table 1**.
- Ripperdan's well levels for lands within GFWD increased an average of 10 feet between 2023 and 2024 due to the recharge. This suggests that the same would be true when excess surface water is made available for recharge of the subject lands if they are annexed to GFWD.

2. *Does the annexation hurt the District?*

The annexation does not harm GFWD financially or in its ability to provide sustainability of the basin.

- Relative to the Madera Subbasin, GFWD demands do not result in changed conditions because there is no physical barrier for groundwater movement between lands inside and outside of GFWD.
- The groundwater demand for the subject lands is unchanged as they will continue to remain in the same crop type.
- The 2023 and 2024 groundwater demand of the subject lands is 37% less than what is set forth as water budgets for the Madera and GFWD GSPs.
- Ripperdan Ranch would pay for all costs associated with surveying its existing wells and recording static water levels (which are already measured monthly), and the installation of any required infrastructure.

3. *How does the annexation relate to the GFWD GSA?*

The annexation would require changes to GFWD, and the GFWD and Madera Subbasin GSPs.

- The annexation will require the GFWD boundary to be increased requiring approval from LAFCO.
- The annexation will require minor changes to the GFWD GSP, which is currently under review by the Department of Water Resources and has not yet been approved.
- The GFWD GSP will require updating to include the changes in acreage and crop demands.
- The allocation of groundwater may need to be adjusted in both the GFWD and Madera Subbasin GSPs. As noted above, the actual Ripperdan Ranch water demands are less than the allocation provided for in the GFWD GSP.
- Ripperdan Ranch has no expectation of GFWD canal deliveries in normal year types. Nor is Ripperdan Ranch looking to obtain new surface water diversions from GFWD for irrigation of the subject lands, except when water is made available by GFWD.
- The GFWD GSP water balance will require changes for the annexation, which does not represent a physical change in conditions of the basin.

Summary: Why does G-3 want to annex the additional Ripperdan Ranch lands to the GFWD?

- We understand that Ripperdan Ranch is an important development to G3 Enterprises as its vineyards produce higher yield and better quality than its other regional ranches.
- In 2023 the well levels increased by 10 feet from the groundwater recharged on the Ripperdan Ranch lands within GFWD, resulting in future assurance of supply and reduced pumping costs if groundwater levels increase.
- The annual allocation of groundwater in GFWD's GSP is greater than that within the Madera Joint GSP. This could be beneficial in the future to Ripperdan Ranch if crop type were ever changed.
- Annexation of the subject lands will not require Ripperdan Ranch to install new infrastructure to accomplish groundwater recharge, all facilities are in-place.

We trust the foregoing provides you with the analysis you requested. We would be happy to discuss this matter with you and/or Gravelly Ford Water District.

Encl.



MEMO

Date: November 15, 2022

Project No.: 180035 / /Task
Ph
ase

To: Gravelly Ford WD Board

From: Garth Pecchenino

Subject: Annexation – Gallo APN's 040-055-001 & 012

cc: Name or delete

Ripperdan (Gallo) Annexation:

The proposed two parcels have a total of 773 acres, the following provides information on each parcel.

Parcel #APN 040-055-001 630.58 Acres-Owners G3 Enterprises

6 wells – Owner provided well information on 5 of the 6 wells, location of wells on a map

Crop – grapes

Irrigation system drip with ability to flood

Delivery system, has lift pump in Gravelly Ford Canal, would deliver through existing pipelines on owners property to the west of proposed annexation parcel

Parcel #APN 040-055-012 181.19 Acres-Owners G3 Enterprises

2 wells – Owner did not provide any information other than location on a map

Crop – grapes

Irrigation system drip with ability to flood

Delivery system, has lift pump in Gravelly Ford Canal, would deliver through existing pipelines on owners property to the west of proposed annexation parcel

Note these two parcels are adjacent to the District boundary of GFWD, one of the fundamental requirements of LAFCO for annexation, continuous and adjacent.

Also, in a previous annexation the District required that the land to be annexed have a surface water supply, owner did not provide any information on this item.

The property appears to have the water supply from groundwater pumping, this would be an additional draft of groundwater to the GFWD GSA area if annexed into the district and during none or limited surface water availability the pumping of groundwater would add to the deficit for the water budget of the GFWD GSA basin, these lands should be accounted for in the County wide GSA currently.

The owner stated that existing facilities could receive surface water from GFWD existing facilities, by extending a pipeline and improving the lift pumps.



If the annexation was advanced LAFCO could make findings that the proposed parcels are adjacent, have the ability to connect to District facilities and have similar land use as is within the current district boundary.

What I put in my Memo to the Board for the September 2022 meeting still would apply;

1.) Does the annexation of the property help the District?

From the standpoint of additional ground, it could be looked on as a positive like a city adding additional lands for development, as stated in the previous annexation in 2007 the property will need to bring an existing surface supply. This would bring additional water into the District for those lands but could be used for recharge depending on the guidelines or conditions of those waters. Additionally, those lands where required to cover the costs associated with the necessary infrastructure to provide water delivery to the parcels of land.

2.) Does the annexation hurt the District?

Having additional ground could be a detriment to the District as it could limit the allocation of surface water to the existing lands in the District when surface waters are available. This would increase the acreage for the GSA and in the GSP report so the volume of waters for recharge and pumping would increase by the crop demand of the annexed acreage.

3.) How does annexation relate to GSA, concerns.

An annexation to the GSA would require the following:

1. Update to GSA boundary, filing with State
2. Revisions to the GSP for the acreage, crop demand, pumping and water balance of the GSA area.

Assuming the crop pattern is similar to the existing acreage in the District the average annual water demand per acre would remain the same. The additional land would increase the overdraft of the basin in drought years.

The Agricultural well(s) on the property would need to be surveyed and the standing water levels measured and put into the GSP report and a determination as to the impact to the average groundwater levels for the GSA as a whole to meet the thresholds and measurable objectives set in the GSP report. If the lands bring in surface water for recharge, then depending on the amount of recharge it could offset the pumping on the annexation lands, fall short of that volume or exceed the volume and provide a net positive.

The change in the storage sustainability indicator is the key, the measurements on the groundwater levels and the subsidence measurements will need to continue to show that the GSA for GFWD has meet the measurable objectives and not reached a threshold for the storage sustainability indicator.

GAP

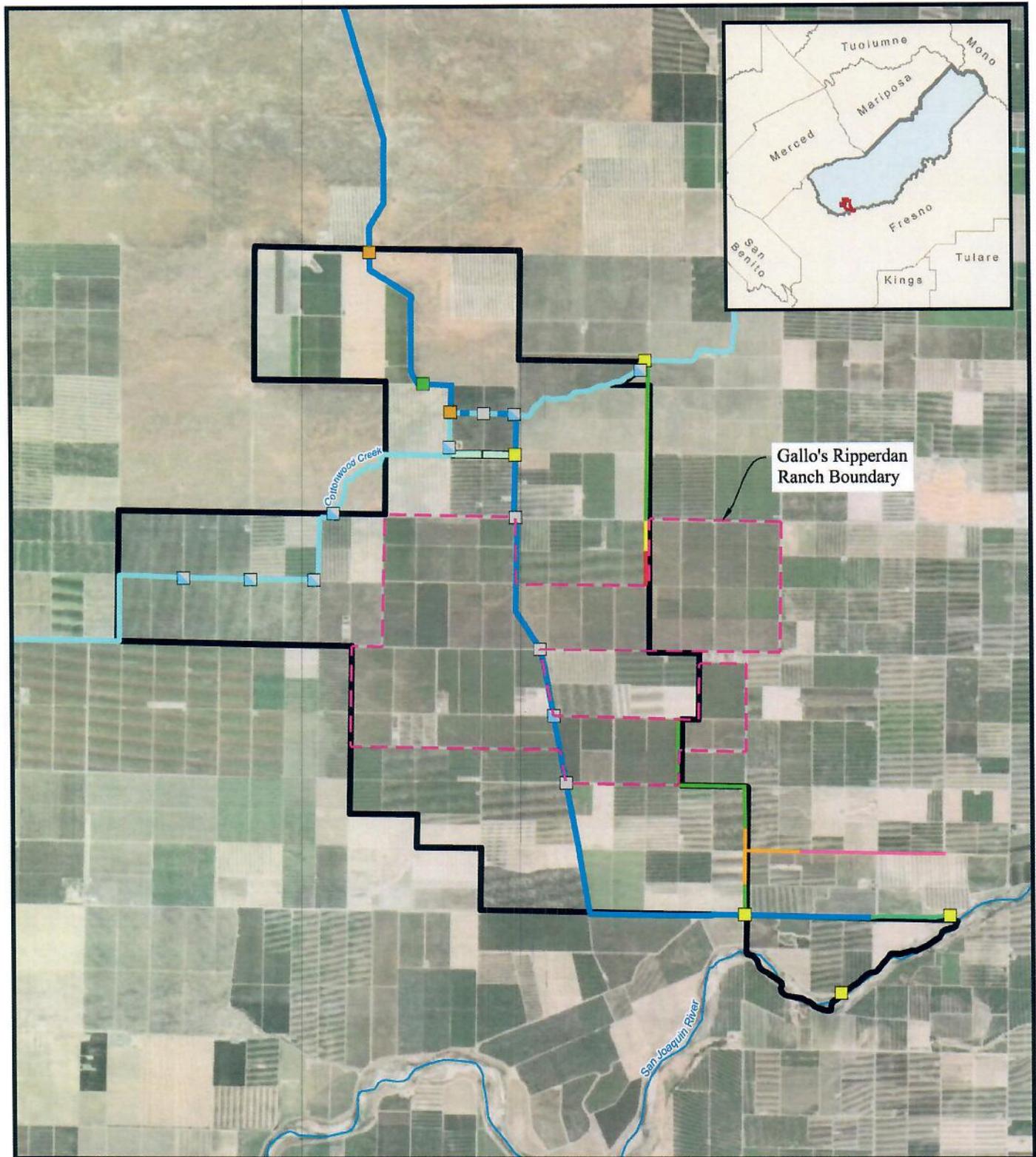


Figure 1-1 Gravelly Ford Water District



- | | | | |
|--------------------|---------------------|----------|-------------------|
| Pump Station | Gravelly Ford Canal | 36" Pipe | Overlap |
| Weir/Road Crossing | Cottonwood Creek | 27" Pipe | San Joaquin River |
| Gate | 48" Pipe | 24" Pipe | Recharge Basin |
| Meter | 42" Pipe | 18" Pipe | Gravelly Ford WD |
| Road Crossing | | | |



0 Miles 1

QK Sources:
ESRI Source: Esri,

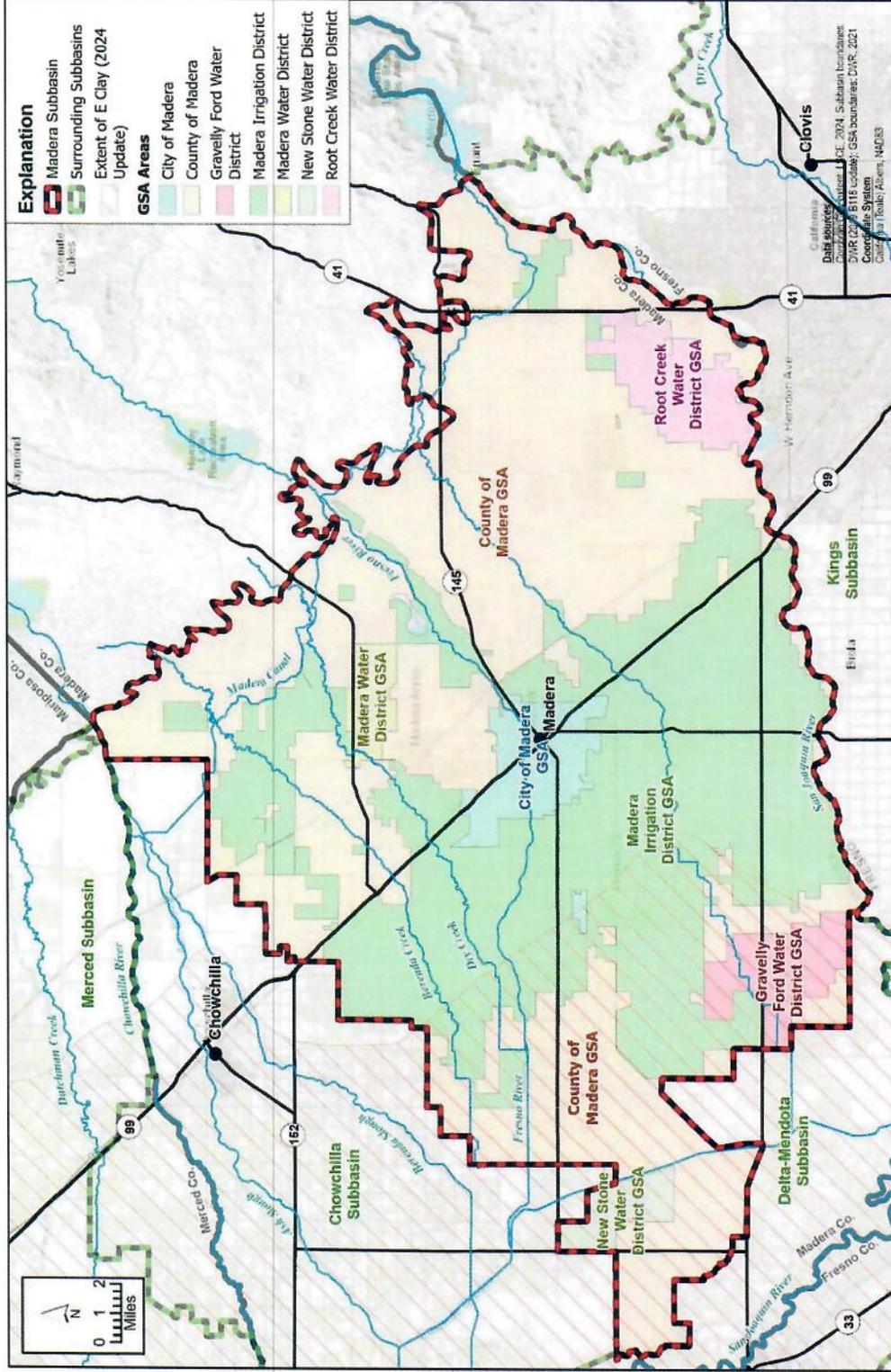


Figure ES-1. Madera Subbasin GSAs Map.⁶

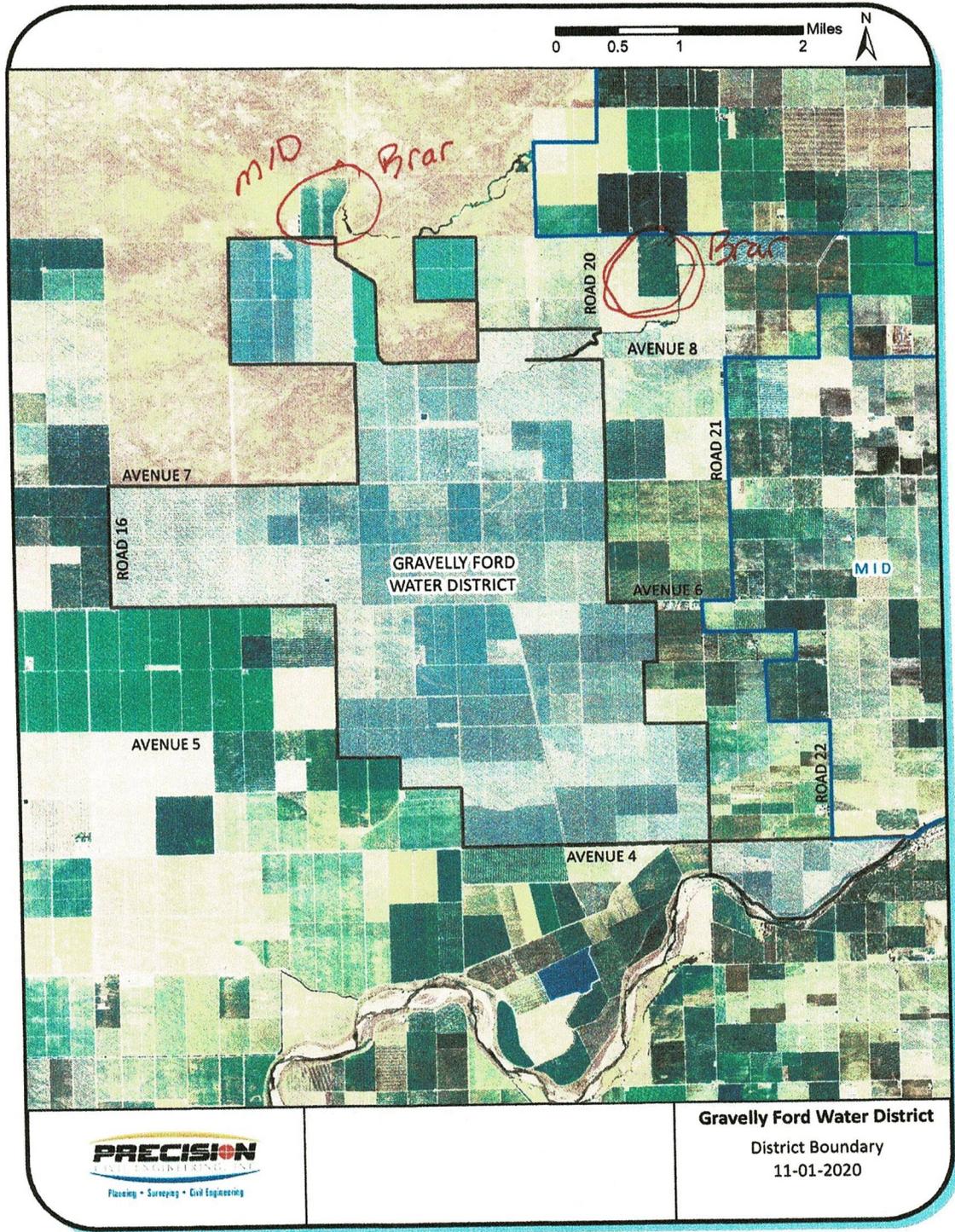
⁶ The GSA boundaries have been updated since initial GSP submission and the boundaries shown in the figures contained in this version of the GSP do not include the most recent version of the boundaries. Updates to figures will occur during the second periodic evaluation of the GSP and/or annual reports. This statement applies to all figures contained in this GSP and appendices.

TABLE 1
G3 Enterprises - Ripperdan Ranch
Well Level Comparison

Well Number	Lands Within	2023 Depth to Water (Feet)	2024 Depth to Water (Feet)	Increase in Water Level Between 2023 & 2024 (Feet)
RP-10	GFWD	177.00	164.00	13
RP-11	GFWD	165.00	149.00	16
RP-16	GFWD	166.00	158.00	8
RP-17	GFWD	184.00	169.00	15
RP-27	GFWD	138.00	115.00	23
RP-8	GFWD	163.00	154.00	9
RP-9	GFWD	163.00	159.00	4
RP-D3	GFWD	153.00	146.00	7
RP-D4	GFWD	140.00	132.00	8
RP-D5	GFWD	170.00	168.00	2
RP-D6	GFWD	176.00	178.00	-2
RP-D7	GFWD	162.00	149.00	13
RP-D8	GFWD	144.00	128.00	16
Average				10
RP-1	Madera County	155.00	146.00	9
RP-28	Madera County	140.00	120.00	20
RP-29	Madera County	140.00	125.00	15
RP-3	Madera County	155.00	141.00	14
RP-4	Madera County	151.00	129.00	22
RP-6	Madera County	160.00	152.00	8
RP-D1	Madera County	167.00	162.00	5
RP-D2	Madera County	158.00	156.00	2
Average				12

Notes:

1. Water use was provided from Ripperdan Ranch meter readings.
2. In 2023, approximately 1,000 acre-feet of surface water was provided by GFWD for recharge of Ripperdan lands within the GFWD which contributed to the increase in water levels between 2023 and 2024.



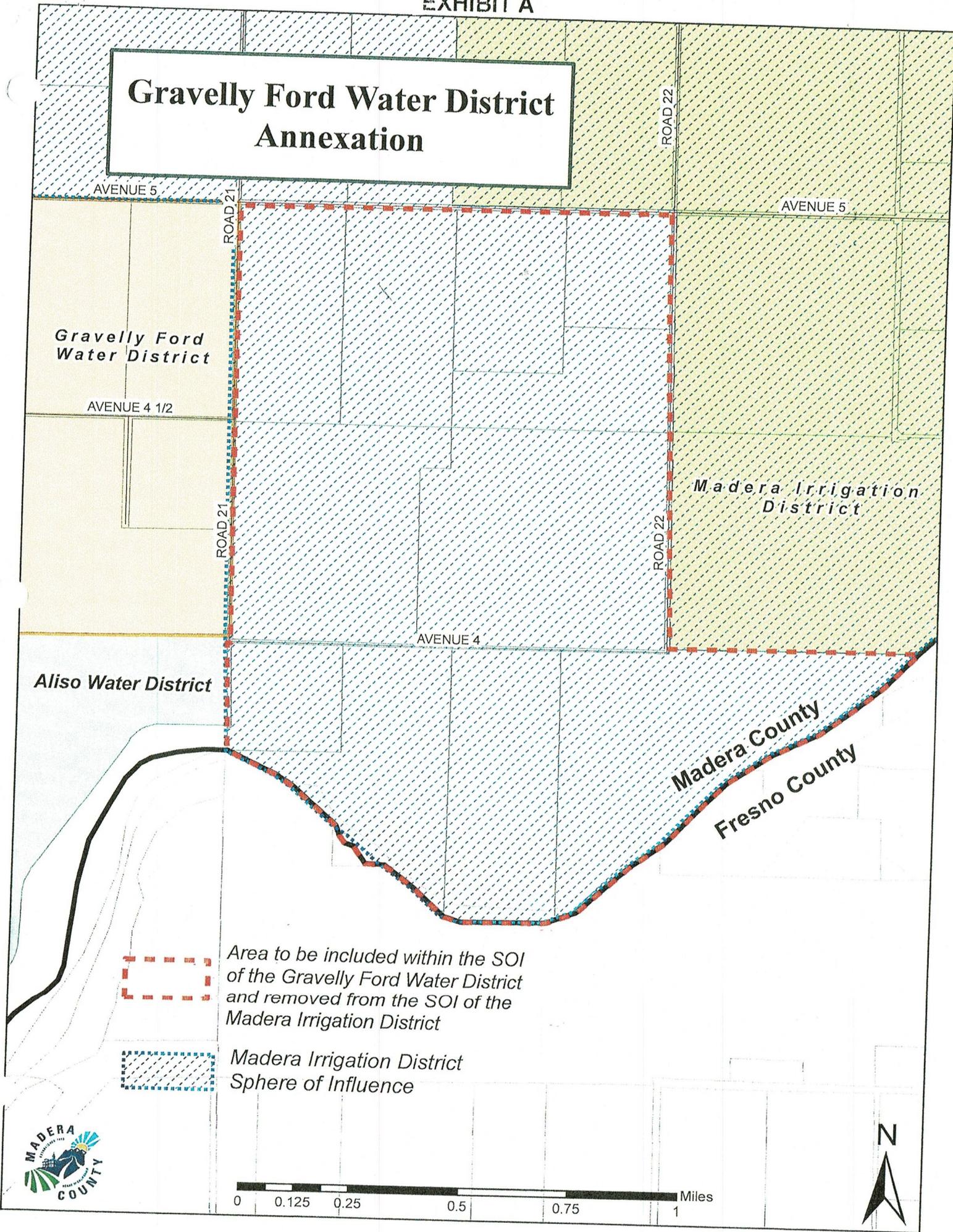
PRECISION
 Planning • Surveying • Civil Engineering

Gravelly Ford Water District
 District Boundary
 11-01-2020

Brar

EXHIBIT A

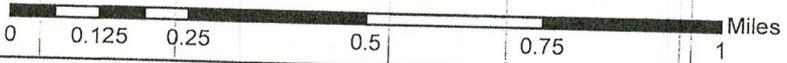
Gravelly Ford Water District Annexation



Area to be included within the SOI of the Gravelly Ford Water District and removed from the SOI of the Madera Irrigation District



Madera Irrigation District Sphere of Influence



Gravelly Ford Water District Annexation

Madera Irrigation District

Gravelly Ford Water District

Aliso Water District

MADERA COUNTY

FRESNO COUNTY



-  Gravelly Ford WD Proposed Sphere of Influence Expansion
-  MID Sphere of Influence
-  Gravelly Ford WD Proposed Annexation

