

# FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY



---

## BOARD OF DIRECTORS

**Eugene F. West**, Chair, Director, Camrosa Water District  
**Kelly Long**, Vice Chair, Supervisor, County of Ventura  
**Michael Craviotto**, Farmer, Agricultural Representative  
**Lynn Maulhardt**, Director, United Water Conservation District  
**Tony Trembley**, Councilmember, City of Camarillo

## INTERIM EXECUTIVE OFFICER

**Arne Anselm**

April 1, 2025

The Honorable Diane Papan  
Chair, Assembly Committee on Water, Parks and Wildlife  
State Capitol  
Sacramento, California 95814

RE: SUPPORT: Assembly Bill 1466, As Amended  
Groundwater Adjudication: Standard of Review

Dear Chair Papan:

The Fox Canyon Groundwater Management Agency (Fox Canyon) supports Assembly Bill 1466 (Hart), which establishes the standard of review courts shall use when reviewing actions of a groundwater sustainability agency (GSA) and sets forth a process to protect the rights of small water users in an adjudication. In conjunction with your AB 1413, this bill seeks to close loopholes within the groundwater adjudication process that are being used to impede the implementation of SGMA, including delaying groundwater sustainability measures while failing to protect the rights of small water users. It builds upon the efforts of the Legislature in 2023's Assembly Bill 779.

AB 1466 mandates that courts use the "Substantial Evidence" standard when reviewing GSA actions during adjudications. This requires upholding a GSA's decision if there is enough evidence for a reasonable person to support the conclusion. This standard defers to the decision-maker's findings, meaning appellate courts won't replace the judgment of the lower court or agency unless the evidence is clearly insufficient.

***AB 1466 is essential as litigants aim to use groundwater adjudications for a full, independent review of the findings by groundwater sustainability agencies, the Department of Water Resources, and the State Water Resources Control Board under SGMA.***

Some litigants have improperly attempted to use the adjudication process to overturn the approval of technical findings contained within a groundwater sustainability plan (GSP) by a groundwater sustainability agency and the Department of Water Resources (DWR). The Legislature has established a proper venue within the Sustainable Groundwater

SUPPORT: Assembly Bill 1466, As Amended  
April 1, 2025

Management Act (SGMA) for any interested party to challenge these technical findings and sustainability measures, which is through a validation action.

For the reasons stated above, IWVGA supports Assembly Member Hart's AB 1466 and respectfully requests your AYE vote.

Sincerely,



Arne Anselm

Interim Executive Officer

Fox Canyon Groundwater Management Agency