

LAS POSAS BASIN POLICY ADVISORY COMMITTEE MEETING

Thursday, March 21, 2024, 3:00 P.M.

In Person:

Calleguas Municipal Water District, 2100 Olsen Road, Thousand Oaks, CA 91360

Via Zoom:

<https://us06web.zoom.us/j/84816327542?pwd=Y-bN4zt674FOphU6wRyxXw9swYTgvA.9bNuXf3yWWBZyrae>

Webinar ID: 848 1632 7542

Passcode: 400774

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Las Posas Basin Policy Advisory Committee (PAC) will hold a meeting at 3:00 P.M. on **Thursday, March 21, 2024**, in the Board Meeting Room of the Calleguas Municipal Water District and via Zoom.

AGENDA

A. Call to Order

B. Roll Call

C. Agenda Review

D. Public Comments

E. PAC Member Comments

F. Regular Agenda

1. Approve the Minutes of the March 7, 2024 regular PAC meeting

2. Watermaster/Fox Canyon Groundwater Management Agency (FCGMA) staffing

The FCGMA, which provides staff to the Watermaster, commissioned the law firm of Rutan & Tucker, LLP to provide an opinion on alternatives for staffing the Fox Canyon Groundwater Management Agency. The memo is attached. The PAC will consider whether and how to weigh in on this issue.

3. Watermaster billing

At the March 7, 2024 PAC meeting, the PAC identified three issues, regarding process and logistics of billing the Watermaster assessment, that required clarification. The PAC Chair submitted those questions to the Watermaster via email on March 8 and received answers on March 13. The email correspondence is attached for the PAC review.

One issue remains outstanding: responsibility for mutual exclusives' late fees/nonpayment. The PAC will discuss whether any further action on its part is necessary.

4. Update on GSP Annual Update

The PAC Chair submitted the attached Recommendation Report regarding the GSP Annual Report.

5. PAC Administrator

The nominating subcommittee will update the PAC on progress made on identifying a PAC Administrator.

G. Future Agenda Items

The PAC will consider items for future agendas.

H. Adjourn

LAS POSAS VALLEY BASIN POLICY ADVISORY COMMITTEE MEETING

Meeting Minutes for March 7, 2024

The Las Posas Valley Basin Policy Advisory Committee (PAC) held a meeting at 3:00 P.M. on Thursday, March 7, 2024, in the Board Meeting Room of the Calleguas Municipal Water District Office and via Zoom.

- A. Call to Order:** Chair Prichard called the meeting to order at 3:03 P.M.
- B. Roll Call:** All PAC members were present unless otherwise noted:
1. Calleguas Municipal Water District – Ian Prichard, Chair (via Zoom)
 2. Zone Mutual Water Company – John Menne (via Zoom)
 3. Ventura County Waterworks District Nos. 1 and 19 – Joseph Pope
 4. Commercial – Scott Meckstroth
 5. Watermaster (non-voting) – Farai Kaseke (via Zoom)
 6. East Las Posas Large Agriculture – David Schwabauer
 7. East Las Posas Small Agriculture – Josh Waters – Not Present
 8. East Las Posas Mutual Water Company – Laurel Servin
 9. West Las Posas Large Agriculture – Rob Grether, Vice Chair
 10. West Las Posas Small Agriculture – Richard Cavaletto
 11. West Las Posas Mutual Water Company – Steven Murata
- C. Agenda Review:** There were no requested changes to the agenda.
- D. Public Comments:** There were no public comments.
- E. PAC Member Comments:** There were no PAC member comments.
- F. Regular Agenda**
1. **Approve meeting minutes for:**
 - a. February 6, 2024, Special Meeting
 - b. February 8, 2024, Special Meeting
 - c. February 9, 2024, Special Meeting
 - d. February 15, 2024, Regular Meeting

Joseph Pope made a motion to approve the meeting minutes as stated for the three special meetings and one regular meeting; Rob Grether seconded the motion which passed with unanimous consent.

2. **Watermaster/Fox Canyon Groundwater Management Agency (FCGMA) staffing:** The FCGMA, which provides staff to the Watermaster, is experiencing staffing challenges, and their board has begun investigating alternative staffing arrangements to ensure their work can proceed.

PAC Chair Prichard invited FCGMA Board Chair Gene West to be a guest speaker at the meeting, and Chair West provided the following information to the group for consideration:

- a. The PAC and TAC were created to allow for increased public participation in the management of the Las Posas Valley Basin, and he is very supportive of this direction. Building mutual trust with the constituents is an important agency goal.

- b. Chair West wants the PAC to be highly collaborative with the Watermaster; specifically, he recommended the PAC consider appointing sub-committees to mirror the structure of FCGMA's committees and to partner directly with them. Their committees are:
 - i. Finance/Fiscal Committee
 - ii. Operations Committee
 - iii. Executive Committee
- c. The staffing shortage at FCGMA has reached a serious level. By March 31, 2024, the agency expects that there will be eight open positions out of a possible twelve staff members.
- d. The executive officer position is vacant and needs to be filled; it may be preferable to have an executive officer whose only responsibility is FCGMA. Chair West indicated that he would like to include the PAC and possibly the public in the interview process; he appreciates an inclusive process and approach where possible. More information will be provided soon.
- e. Chair West states that a possible next step is for FCGMA to hire a consultant to evaluate the costs and benefits of the staffing options; this is under review now and more specifics will be available after the FCGMA Special Board Meeting on March 8, 2024, when the board will receive a legal opinion from outside counsel advising them on which of the options are viable in keeping with the enabling legislation for the agency.

Vice-chair Grether advised that once the legal opinion outlining the allowable staffing options is made public, the PAC will then have an opportunity to discuss and decide what position to take in terms of a response to the FCGMA board about future staffing.

- 3. Initial Basin Assessment:** There was a thorough discussion about the billing of the initial basin assessment of \$64 per acre-foot of annual allocation. In accordance with FCGMA board approval, 50% of the assessment (\$32/AF) will be billed on March 1, 2024, and the balance will be billed on June 1, pending any amendments based on review of Watermaster expenditures. The mutual water companies will be billed for the total of the annual allocations for their exclusive shareholders. Late fees will be assessed to the mutuals by Watermaster after 30 days of non-payment, as stated in the LPV Adjudication Judgment. Hybrids will be billed directly by Watermaster.

The following questions were asked of Watermaster:

- a. Can Watermaster provide a letter to all WMID holders clarifying that the basin assessments will be collected by their mutual water companies on behalf of Watermaster?
- b. Can Watermaster provide a breakdown of shareholders by mutual water company including billing amounts for each WMID?
- c. Watermaster agreed to provide clarification on how late fees will be billed in cases when WMID holders fail to pay.

Mr. Kaseke, the Watermaster PAC representative, stated that all questions needed to be run through County counsel. Chair Prichard offered to convey the questions in an email to Watermaster that would be forwarded to County counsel.

- 4. Committee Consultation:** GSP Annual Report: On February 29, 2024, the Watermaster submitted to the PAC the draft 2024 Las Posas Basin Groundwater Sustainability Plan (GSP) Annual Report for committee consultation, and Watermaster requests PAC comments on the GSP Annual Report by March 16, 2024. The professionals at Dudek have been asked to provide public workshops to educate the local constituents on the plans for the LPV basin. Chair West requested participation from technical experts at the PAC, TAC, and the public to join these discussions.

An initial review of the GSP Annual Report by PAC members raised several questions and it was determined that the PAC without the TAC does not have adequate specialized knowledge to evaluate the report in depth. The March 16, 2024 due date does not allow enough time for the TAC to engage with the project and provide feedback. Chair Prichard has assembled the preliminary remarks and observations

made by PAC members, and he offered to create a comment letter to FCGMA with the PAC's questions and to request a time extension from the Department of Water Resources. The PAC unanimously approved this plan.

- 5. PAC Administrator:** The PAC briefly discussed the responsibilities of the PAC Administrator and how they want to fill the position. Joe Pope made a motion to have the nominating committee finalize the job description and the salary budget request and once approved by Watermaster/FCGMA, to perform initial candidate interviews and to conduct second interviews with the entire PAC for final selection. David Schwabauer seconded the motion, which passed unanimously.
- 6. Constituent Education/Communication:** The PAC discussed ways to increase communication with the LPV constituent groups. There was discussion about a "town hall"-style meeting to offer an opportunity for WMID holders to hear information about the future of the LPV basin. There were several ideas discussed and a volunteer sub-committee was formed including Laurel Servin, David Schwabauer, and Richard Cavaletto. The sub-committee will develop a list of ideas and present them at a future PAC meeting.
- G. Future Agenda Items:** A request was made for future agenda(s) to include a discussion about the creation of the water market and associated policies, etc. Chair Prichard indicated that he would prefer to wait until the PAC and TAC have had some time to work together and to review goals and reporting requirements, etc. before delving into the specifics of the water market.
- H. Adjournment:** Chair Prichard adjourned the meeting at 5:32 P.M., until the next regular meeting which is scheduled for March 21, 2024.

MEMORANDUM

**CONFIDENTIAL: ATTORNEY-CLIENT PRIVILEGED
COMMUNICATION AND ATTORNEY WORK PRODUCT**

TO: BOARD OF DIRECTORS, FOX CANYON GROUNDWATER
MANAGEMENT AGENCY

FROM: JOSEPH D. LARSEN, RUTAN & TUCKER, LLP

DATE: February 16, 2024

FILE NO.: 038564-0001

RE: ALTERNATIVES FOR STAFFING FOX CANYON GROUNDWATER
MANAGEMENT AGENCY

I. BACKGROUND

The Fox Canyon Groundwater Management Agency (“FCGMA”) is a special act agency that was created by state law in 1982 to protect the groundwater resources in its area from seawater intrusion and overexploitation. The state law, also known as the Fox Canyon Groundwater Management Agency Act, is found in the Water Code Appendix §§ 121-102 - 121-1105 (the “Act”).¹ It grants FCGMA the power to implement various water management measures for agricultural, municipal, and industrial uses, as well as other powers that are necessary and proper to achieve its goals. (*See* Cal. Wat. Code App., §§ 121-102.)

FCGMA also has the authority of a groundwater sustainability agency (“GSA”) under the Sustainable Groundwater Management Act (“SGMA”) since it submitted a groundwater sustainability plan (“GSP”) to the Department of Water Resources (“DWR”) in 2017. SGMA,

¹ The need for FCGMA arose from a State Water Board investigation into seawater intrusion beneath the Oxnard Plain Basin. This investigation led to the Oxnard Plain Groundwater Study in 1979, revealing ongoing seawater intrusion despite local efforts, affecting 20 square miles of the basin. In response, the State Water Board initiated discussions on restricting groundwater pumping or implementing a physical solution to preserve the water quality of the basin. Simultaneously, the State Water Board supported a local approach to address seawater intrusion by approving an \$8 million grant for the construction of the Improved Vern Freeman Diversion and Pumping Trough Pipeline under the Clean Water and Water Conservation Bond Act of 1978. A condition for the grant required the County of Ventura (the “County”) and the United Water Conservation District (“United”) to seek legislative approval for the establishment of FCGMA.

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which is codified in the Water Code §§ 10720 - 10737.8, provides FCGMA with additional powers to manage groundwater and surface water conjunctively, exchange and distribute water, reclaim, and treat water, construct and operate works and improvements, and purchase and transfer water or water rights. (See Wat. Code §§ 10725 - 10726.8.)

In addition, FCGMA was appointed as the watermaster for the Las Posas Valley Groundwater Basin (the “LPV Basin”) by the Santa Barbara Superior Court on July 10, 2023, under a judgment in *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency*, Santa Barbara Sup. Ct. Case No. VENC100509700 (the “LPV Judgment”).² The LPV Judgment adjudicates all groundwater rights in the LPV Basin and provides for its sustainable management. As the watermaster for the LPV Basin, FCGMA is responsible for implementing and administering the LPV Judgment, as well as complying with SGMA and the FCGMA Act.

Since its inception, FCGMA has been contracting with the County of Ventura (the “County”) for staff and other services, as authorized by section 408 of the FCGMA Act (“Section 408”). (See Cal. Wat. Code App., §§ 121-408.) However, in late 2023, FCGMA board members discussed the possibility of hiring independent staff to meet the agency’s future staffing needs given its expanding duties. This discussion took place at a regular board meeting on September 27, 2023, and a special meeting on December 1, 2023. Following that meeting, this office was retained to opine on the issue.

II. QUESTIONS PRESENTED

What alternatives does FCGMA have for staffing considering its powers and responsibilities to implement and comply with the FCGMA Act, SGMA, and the LPV Judgment?

III. BRIEF ANSWERS

Based on the principles of statutory interpretation, the legislature likely intended Section 408 of the Act to permit FCGMA to contract for staff with other contractors beyond just the County or United. Moreover, the LPV Judgment, appointing FCGMA as watermaster, permits FCGMA to hire staff for LPV Basin management when acting in its capacity as a watermaster since the

² In addition to the LPV Basin, FCGMA’s jurisdictional area included portions of the following groundwater basins: Oxnard Subbasin, Pleasant Valley Basin, and Arroyo Santa Rosa Valley Basin. The Oxnard Subbasin and Pleasant Valley Basin are the subject of a pending adjudication action in *OPV Coalition v. Fox Canyon Groundwater Management Agency, et al.*, Santa Barbara Sup. Ct. Case No. VENCI00555357.

court has inherent authority in appointing watermasters to ensure effective groundwater management in compliance with constitutional and statutory obligations.

IV. ANALYSIS

A. Section 408 of the Act likely allows FCGMA to contract for staff with other contractors, not just with the County or United.

Public agencies created by statute can generally “exercise only those powers ‘which are conferred on them by the act under which they are incorporated, or such as are necessarily incidental to the exercise of their corporate rights, the performance of their corporate duties, and the accomplishment of the purposes for which they are created.’[Citation.]” (*Palmer v. West Kern County Water Dist.* (1961) 193 Cal.App.2d 41, 45.) “[T]he rule is well established that language purporting to define the powers of a municipal corporation is to be strictly construed, and ... the power is denied where there is any fair, reasonable doubt concerning the existence of the power. [Citation.]” (*Water Quality Ass’n v. County of Santa Barbara* (1996) 44 Cal.App.4th 732, 746.)

Here, the Act prescribes “the boundaries, organization, operation, management, financing, and other powers and duties of the agency.” (FCGMA Act (Stats. 1982, ch. 1023.) According to Section 102 of the Act, FCGMA “shall exercise the powers granted by this act for purposes of groundwater management within the boundaries of the agency, together with such other powers as are reasonably implied and necessary and proper to carry out the objectives and purposes of the agency.” (Cal. Wat. Code App., §§ 121-102.) With regards to staffing, Section 408 of the Act provides that FCGMA “may contract with the county or United for staff and other services and may hire such other contractors and consultants as it considers appropriate.”³ (Cal. Wat. Code App., §§ 121-408.)

³ In addition to its enabling legislation, FCGMA possesses the authority to enter into contracts for services under Government Code section 53060, which provides: “The legislative body of any public or municipal corporation or district may contract with and employ any persons for the furnishing to the corporation or district special services and advice in financial, economic, accounting, engineering, legal, or administrative matters if such persons are specially trained and experienced and competent to perform the special services required.” However, the authority granted by section 53060 is confined to contracting for “special services.” This particular grant of authority prohibits a public entity from contracting with a private entity for services that do not fall within the category of “special services,” as interpreted by the courts (*Costa Mesa City Employees’ Assn. v. City of Costa Mesa* (2012) 209 Cal.App.4th 298, 315–316). The term “special services” has been judicially defined to encompass services that are unique, unusual, and out of the ordinary (*Jaynes v. Stockton* (1961) 19 Cal.App.3d 47, 51). Determining whether services qualify as “special” involves assessing the qualifications of the person providing them and their

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It should be noted that contracting for staff is not required in Section 408. Indeed, the use of the word “may” indicates permissive rather than mandatory conduct. (See e.g., Water Code § 15 [“‘Shall’ is mandatory and ‘may’ is permissive”].) However, if contracting for staff is desired, “it may only be done in the manner provided for by the statute. The mode prescribed is the measure of the power.” (57 Ops. Cal. Atty. Gen. 307, 310 (1974) citing *Reams v. Cooley* (1915) 171 Cal. 150, 154 [“Where the statute prescribes the only mode by which the power to contract shall be exercised the mode is the measure of the power”]; *Bear River Sand and Gravel Corp. v. County of Placer* (1953) 118 Cal. App. 2d 684, 689 [“When the power of a board or public officer is limited to a prescribed method of contracting, the mode prescribed becomes the measure of the power”]; see also *People v. Zamora* (1980) 28 Cal.3d 88, 98.)

Here, Section 408 of the Act grants a power to contract and prescribes the mode of its exercise. Specifically, FCGMA “may contract with the county or United for staff and other services and may hire such other contractors and consultants as it considers appropriate.” (Cal. Wat. Code App., §§ 121-408.) However, the language is not entirely clear as to whether the ability to contract “for staff” is limited to “the county or United” or may be extended to “other contractors and consultants as [FCGMA] considers appropriate.” Each interpretation settles but also raises textual questions.

According to the County, FCGMA has two distinct kinds of contracting power: (1) it can contract with the County or United for “staff and other services;” and (2) it can hire “other contractors and consultants.” According to the County, if section 408 were interpreted as permitting FCGMA to hire any “contractors and consultants” to do staff functions, it would render superfluous the previous provision that references FCGMA’s ability to contract with the County and United for staff. Generally, statutes should be interpreted so that every word in a statute has meaning and not be redundant. (*Tuolumne Jobs & Small Business Alliance v. Superior Court* (2014) 59 Cal.4th 1029, 1038; see also *Plantier v. Ramona Municipal Water Dist.* (2019) 7 Cal.5th 372, 386 [statutes should not be read in a way that makes meaningless the language that the Legislature has enacted]; *Larson v. State Personnel Bd.* (1994) 28 Cal.App.4th 265, 277 [every word, phrase, and sentence in a statute should, if possible, be given significance].)

availability from public sources (*Darley v. Ward* (1982) 136 Cal.App.3d 614, 627-628). Staff services, which pertain to the day-to-day operation of a public agency, do not meet the criteria of being unique, unusual, or extraordinary. Consequently, such services would not be considered the type of “special services” envisioned by section 53060. Regardless, Section 408, which specifically addresses FCGMA’s ability to contract for staffing would control over the more general provision of Gov. Code § 53060, which is a more general provision that relates to all municipal corporations. (*Turlock Irrigation Dist. v. Hetrick* (1999) 71 Cal.App.4th 948, 953 [“those provisions specifically addressing the powers and purposes of irrigation districts control over the more general provisions relating to all municipal corporations”].)

However, that interpretation does not account for the words “such other” – words that, under the County’s reading, would be rendered devoid of any meaning.⁴ The County’s reading of Section 408 suggests the statute could have been written to say that FCGMA “may contract with the county or United for staff and may hire contractors and consultants for other services as it considers appropriate.” Instead, section 408 uses the phrase “and may hire such other”, which is inherently relational. (*People v. Hubbard* (2016) 63 Cal.4th 378, 386-388.) The use of the words “such other” suggests that the previously referenced “county and United” share the same characteristic as the “contractors and consultants” mentioned thereafter—namely, that the ability to contract “for staff and other services” may be extended to “other contractors and consultants as [FCGMA] considers appropriate.” Under that reading, then, the word “such other” refers back to the ability to contract “for staff and other services”. This interpretation is also consistent with the general rule that the “[i]nclusion of catchall language in a statute or regulation indicates that a legislative body does not intend its enumerated provisions to be deemed exclusive.” (*Chase v. Wizmann* (2021) 71 Cal.App.5th 244, 256 citing *Moore v. California State Bd. of Accountancy* (1992) 2 Cal.4th 999, 1019.)

If the County’s interpretation is correct, then FCGMA’s authority to contract for “other services” would be similarly limited to “the county or United.” Indeed, there is no way to distinguish any limitation on the ability to contract for “staff and other services” under the language of Section 408. Thus, an interpretation that limits FCGMA’s ability to contract “for staff” to the County and United would similarly limit FCGMA’s ability to contract for “other services.” But if that be the case, the clause that permits FCGMA to “hire such other contractors and consultants as it considers appropriate” would be superfluous. For what type of “services” would FCGMA be able to hire a “contractor and consultant” if not for “other services”?

⁴ Notably, the enabling legislation for the Kings River East Groundwater Sustainability Agency (“KREGSA”) and North Fork Kings Groundwater Sustainability Agency (“NFKGSA”) include language that is apparently modified from the FCGMA Act with regards to contracts for staffing. For NFKGSA, it says: “The agency may contract with member entities or staff and other services. The agency may hire contractors and consultants as it considers appropriate.” For KREGSA, it says: “The agency may contract with either county or Alta for staff and other services. The agency may hire contractors and consultants as it considers appropriate.” Those provisions are themselves ambiguous. Regardless, they do not contain the “such other” language included in Section 408 of the FCGMA Act, are grammatically distinguishable, include different wording, and were adopted nearly 35 years after the FCGMA Act. Thus, we doubt their usefulness in ascertaining legislative intent with regard to Section 408 of the Act. If anything, the modified wording could show a different legislative intent existed concerning the different statutes. (*County of San Diego v. San Diego NORML* (2008) 165 Cal.App.4th 798, 825.)

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An interpretation that limits FCGMA’s authority to contract for “other services” to only County and United would also lead to absurd results since those entities likely do not have *all* the resources or expertise to competently provide technical or professional services needed for FCGMA to carry out its objectives and purposes in the Act, such as groundwater modeling expertise. (*See e.g.*, Cal. Wat. Code App., §§ 121-102, 121-601, *et seq.*) “Whenever one of two or more possible constructions of a statute leads to an absurdity, the appearance of the absurdity is an indication that the proposed construction is incorrect.” (*Remington Investments, Inc. v. Hamedani* (1997) 55 Cal.App.4th 1033, 1040.)

Moreover, if section 408 permits FCGMA to hire any “contractors and consultants” to do staff functions, it does not necessarily render meaningless the provision that references FCGMA’s ability to contract with the County and United for staff, as the County suggests. Rather, it emphasizes that the County and United “may” provide staffing services to FCGMA, even though they are defined in the Act as a “member agency” entitled to representation on the FCGMA board (Cal. Wat. Code App., § 121-314) and for which FCGMA cannot engage in activities for which they are otherwise responsible (Cal. Wat. Code App., § 121-402) or a defined “operator” that operated groundwater extraction facilities within FCGMA’s jurisdictional boundaries (Cal. Wat. Code App., §§ 121-317).⁵ Regardless, the rule against interpretations that make some parts of a statute surplusage is only a guide and will not be applied if it would defeat legislative intent or produce an absurd result. (*People v. Rizo* (2000) 22 Cal.4th 681, 687.) Again, the “such other contractors and consultants as it considers appropriate” is a “catchall provision” that appears to serve as the residuary clause in section 408 and “legitimizes a myriad of situations the Legislature may not have cared to spell out.” (*McNair v. City and County of San Francisco* (2016) 5 Cal.App.5th 1154, 1165; see also *Chase v. Wizmann, supra*, 71 Cal.App.5th at 256 [“Inclusion of catchall language in a statute or regulation indicates that a legislative body does not intend its enumerated provisions to be deemed exclusive”].)

There was nothing in the legislative history for Section 408 that gave additional insight into how the legislature intended that section to be interpreted. The proposal to add 408 to the Act first occurred in the first amended version of Assembly Bill 2995, dated April 19, 1982 (Assem. Amend. to Assem. Bill No. 2995 (1981-1982 Reg. Sess.) April 19, 1982, p. 8). No changes were

⁵ The County’s memorandum cites to the enabling legislation for Ojai Basin Groundwater Management Agency (“OBGMA”) for the proposition that the legislature knows how to express its intent on this subject and is significant to show that a different legislative intent existed concerning different statutes. With regards to staffing, the OBGMA provides: “The agency may contract for staff and other services and may hire other contractors and consultants.” However, unlike FCGMA, OBGMA does not have “member agencies” that include entities like the County or United. Thus, there would be no reason to emphasize that OBGMA could contract with any particular “member agency” for staffing.

made to that section before being enacted into law (Stats. 1982, ch. 1023, p. 3739). Further, there was no discussion of Section 408 in any legislative committee reports and analysis, any Legislative Counsel opinions, reports and digests, or any other legislative sources.⁶

Though not entirely free from doubt, based on the above-referenced principals of statutory interpretation, we believe the interpretation that most likely reflects the Legislature’s intent with regards to Section 408 would allow contracting “for staff” with “other contractors and consultants as [FCGMA] considers appropriate,” not just “the county or United”.

C. The LPV Judgment permits FCGMA to hire staff to accomplish its purposes as the watermaster for the LPV Basin when acting as a watermaster.

A court-appointed watermaster serves as an arm of the court in managing a basin or adjudicated watershed. (*Dow v. Lassen Irrigation Co.* (2022) 75 Cal.App.5th 482, 489.) Trial courts have inherent authority to grant additional powers to a watermaster that may exceed those powers within the enabling act of the public agency that is appointed to serve as a watermaster as part of a physical solution. (*Water Replenishment Dist. of Southern California v. City of Cerritos* (2012) 202 Cal.App.4th 1063, 1072 [observing, in rejecting a challenge to the appointment of the special district as watermaster, that “the issue is not whether conduct engaged in by WRD exceeded the scope of its power, but whether the court has authority to appoint WRD as watermaster. If WRD were appointed watermaster, its conduct would be judicially authorized and therefore would not be ultra vires.”].)

The California Supreme Court has often recognized the “inherent powers of the court . . . to insure the orderly administration of justice.” (*Hays v. Superior Court* (1940) 16 Cal.2d 260,

⁶ There were some early drafts for a proposed bill found in the legislative bill file of the State Water Resources Control Board that included some alternative language for what became Section 408. Specifically, those early drafts read as follows: “The Agency may hire County or United for staff and other services and may hire such other employees, contractors and consultants as it considers appropriate.” However, there is no information as to who authored these drafts or why the language differs from that which was included in the Act, nor is there any indication that they were provided to or considered by the legislative branch. Thus, these early drafts found in “particular offices within the executive branch should not be considered in determining the intent of the legislative branch.” (*People v. Patterson* (1999) 72 Cal.App.4th 438, 444; *McDowell v. Watson* (1997) 59 Cal.App.4th 1155, 1161, fn. 3.) Further, without knowing who prepared these early drafts or whether they were provided to or even considered by the Legislature, we doubt their usefulness in ascertaining legislative intent. (*Jones v. Lodge at Torrey Pines Partnership* (2008) 42 Cal.4th 1158, 1172 [“we have no basis on which to conclude the document reflects the intent of the legislators who enacted the legislation”].)

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264; see also *Bank of America v. Superior Court* (1942) 20 Cal.2d 697, 702.) Some of the court’s inherent powers are set out by statute, but importantly the inherent powers of the court are derived from the Constitution and are not confined by, or dependent on, statute. (Cal. Const., art. III, § 3; *id.*, art. VI, § 1; *Walker v. Superior Court* (1991) 53 Cal.3d 257, 266–267; *Peat, Marwick, Mitchell & Co. v. Superior Court* (1988) 200 Cal.App.3d 272, 287–288.) A court’s inherent powers are potentially quite wide. (*Asbestos Claims Facility v. Berry & Berry* (1990) 219 Cal.App.3d 9, 19-24.) Article X, Section 2 of the California Constitution, which deals with water rights and conservation, declares that the state’s water resources should be used wisely and efficiently, any waste or unreasonable use of water should be prevented, and that the right to water or its use or flow is limited to what is reasonable and beneficial for the people and the public welfare.

Thus, it is well-settled that, when exercising its authority, a court has a constitutional duty to consider, and if necessary, impose a “physical solution” on the parties with regards to groundwater rights and conservation. (*City of Lodi v. East Bay Municipal Utility Dist.* (1936) 7 Cal.2d 316 [holding that “it is not only within the power but it is also the duty of the trial court to admit evidence relating to possible physical solutions, and if none is satisfactory to it to suggest on its own motion such physical solution.”]; Code Civ. Proc. § 849 [“The court shall have the authority and the duty to impose a physical solution on the parties”].) “[A] physical solution is an equitable decree designed to implement the constitutional mandate and to maximize the beneficial use of water. . . . The court has power to enforce a physical solution regardless of whether the parties agree to it.” (*Central Basin Municipal Water Dist. v. Water Replenishment Dist. of Southern California* (2012) 211 Cal.App.4th 943, 950; citations omitted.) In short, a “physical solution” is a broad remedy that allows a court to make decisions as to the allocation of certain water rights and as to the use and management of water throughout a watershed. Courts often create a mechanism for the implementation of a physical solution and a process through which future disputes will be handled, in stipulated judgments through the appointment and supervision of a watermaster.

The litigation involving the Central and West Coast groundwater basins provides some of the most helpful and recent language from a reported appellate decision on the broad leeway given to courts in fashioning watermaster arrangements and assigning duties to the appointed watermaster under the Court’s inherent authority. (*Water Replenishment Dist. of Southern California v. City of Cerritos* (2012) 202 Cal.App.4th 1063.) That case had its genesis in 2009 when a group of pumpers and the Water Replenishment District of Southern California (“WRD”) filed a motion to amend a 1965 judgment to allocate storage space in the Central Basin. The challenge to the provisions of the proposed amended judgment included, among other things, the proposed appointment of WRD as a watermaster. (*Id.*) In an order dated July 7, 2010, the trial court concluded it was statutorily precluded from appointing WRD as a watermaster. (*Id.* at 1069.) The Court of Appeals disagreed, observing that the trial court had the authority to appoint WRD

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watermaster—with or without statutory authorization. The court observed that the watermaster serves as an arm of the court to “assist the Court in the administration and enforcement of the provisions of this judgment” (*Id.* at 1072.) The Court continued:

“An agency that exceeds the scope of its statutory authority acts ultra vires and the act is void. [citations] For example, an irrigation district’s attempt to provide natural gas service was held ultra vires because the statutes governing the district limited it to providing water, electricity, and drainage. . . Thus, under the ultra vires doctrine, conduct by an agency lacking authority to engage in that conduct is void. [¶] But that doctrine is inapplicable here because the issue is not whether conduct engaged in by WRD exceeded the scope of its power, but whether the court has authority to appoint WRD as watermaster. If WRD were appointed watermaster, its conduct would be judicially authorized and therefore would not be ultra vires. The ultra vires doctrine does not support the conclusion that WRD cannot serve as watermaster.”

“The second amended judgment furnishes no support for respondents’ argument that WRD is prohibited from serving as watermaster. The retention of jurisdiction does not limit the court’s selection of watermaster. The court retained jurisdiction ‘[t]o remove any Watermaster appointed from time to time and appoint a new Watermaster; and to review and revise the duties, powers and responsibilities of the Watermaster and to make such other and further provisions and orders of the Court that may be necessary or desirable for the adequate administration and enforcement of the judgment.’”

(*Id.* at 1072-73, emphasis added.)

Thus, a watermaster appointed by the court has the authority to exercise powers and duties prescribed by the court (*see* Water Code § 4050(b)), which may exceed the powers and authorities specifically delineated in an agency’s organic statute. (*Water Replenishment Dist. of Southern California v. City of Cerritos, supra*, 202 Cal.App.4th at 1072-73.) That authority may include the ability to employ or contract for staff. (*See e.g., Dow v. Lassen Irrigation Co., supra*, 75 Cal.App.5th at 485 [“The watermaster may contract with or employ ‘one or more persons or firms to assist with the watermaster functions’”].)

Here, the LPV Judgement designates FCGMA as the special watermaster for the court, entrusting it with the execution of powers, duties, and responsibilities outlined in the LPV Judgement. (LPV Judgement §§ 1.113, 5.1.) In furtherance of that designation, the LPV Judgment expressly provides that the FCGMA “shall have the discretion and authority to employ or contract with such administrative personnel, engineering, legal, accounting, or other specialty services and consulting assistants as may be deemed appropriate in carrying out the terms of the Judgment, including to employ or contract for its general manager, general counsel, or staff.” (LPV Judgement § 5.2.2, emphasis added.)

While the LPV Judgment further suggests that it does not modify or amend the existing law or authority for the FCGMA to contract for services under its enabling legislation (LPV Judgment §§ 3.5, 5.2.2), that does not mean that additional authority was not granted to FCGMA “when acting in the role as Watermaster” (LPV Judgment § 5.1) or in “its capacity as the watermaster.” (*Dow v. Lassen Irrigation Co.*, *supra*, 75 Cal.App.5th at 491.) If anything, the Act would only limit FCGMA’s contracting authority when it is acting under the Act – but not as the watermaster for the LPV Basin. If the LPV Judgment intended to limit the authority of FCGMA to contract for staff only to certain contractors when acting as the watermaster for the LPV Basin, there would have been no need to expressly grant FCGMA broad “discretion and authority” to employ staff “as may be deemed appropriate in carrying out the terms of the Judgment.” (LPV Judgment § 5.2.2.)

Thus, the FCGMA Act governs the FCGMA’s authority and power when it acts as the groundwater management agency under the Act. It does not address FCGMA’s role or authority as the watermaster for the LPV Basin, which is a distinct function from its role as the groundwater management agency under the Act. The FCGMA Act does not supersede or override the LPV Judgment, which is a court order that adjudicates the groundwater rights and obligations of the parties in the LPV Basin. It appoints FCGMA as the special watermaster for the court under its constitutional duty to consider, and if necessary, impose a “physical solution” on the parties with regard to groundwater rights and conservation. (LPV Judgment, §§ 1.1, 5.1, 7.1.) If the enabling act could limit FCGMA’s powers and duties as a watermaster, then it could prevent FCGMA from functioning as a watermaster altogether, since the LPV Judgement expanded the FCGMA’s duties and powers beyond those in the Act. Indeed, the LPV Judgement sets forth additional duties and powers that there not found in the Act, including additional authority to enforce the terms of the LPV Judgement. (See LPV Judgement § 5.2.6 [the authority to investigate and enforce granted to FCGMA under SGMA and the Act is only the “minimum”].) Therefore, the judgment’s provision that FCGMA “shall have the discretion and authority to employ or contract with such administrative personnel, engineering, legal, accounting, or other specialty services and consulting assistants as may be deemed appropriate in carrying out the terms of the judgment, including to employ or contract for its general manager, general counsel, or staff” (Judgment, § 5.2.2) likely

prevails over any conflicting language in Section 408 of the Act with regards to actions taken by FCGMA in its capacity as the watermaster of the LPV Basin.⁷

B. Nothing in SGMA explicitly provides any independent authority to FCGMA regarding staffing.

Although SGMA grants broad authority to GSAs for implementing its provisions, there is no explicit provision within SGMA that authorizes a GSA to hire or contract for staff. Thus, nothing in SGMA explicitly provides any independent authority to FCGMA regarding staffing. SGMA was amended in 2019 to permit a GSA to “enter into written agreements and funding with a private party to assist in, or facilitate the implementation of, a groundwater sustainability plan or any elements of the plan” (Cal. Wat. Code, §10726.5). However, it appears that the Legislature did not intend for section 10726.5 to grant authorization for a GSA to contract with a private party for staff services. Instead, the purpose of this provision is to enable a GSA to establish a public-private partnership, addressing, among other things, the need for additional capital that a GSA operating independently might be unable to secure (Assem. Com. On Water, Parks and Wildlife, com. on Assem. Bill No. 617 (2015-2016 Reg. Sess., Apr. 14, 2015), pp. 5-6).

* * *

If you have any questions regarding this memorandum, please feel free to contact me at (714) 641-3418.

⁷ The court may have good reasons for providing expanded authority to FCGMA to hire independent staff when acting as the watermaster on behalf of the court, given the County’s status as a water rights holder subject to the groundwater allocation outlined in the LPV Judgment. In its appointed capacity as watermaster, FCGMA is tasked with serving “as an arm of the court” in an impartial and unbiased manner. (*Dow v. Lassen Irrigation Co.*, *supra*, 75 Cal.App.5th at 489; LPV Judgment § 5.1 [“Watermaster shall, in carrying out its duties, powers, and responsibilities herein, act in an impartial manner without favor to prejudice to any Party”].) Having a water rights holder subject to the groundwater allocation under the LPV Judgment providing exclusive staffing to the watermaster for the LPV Basin management could raise potential conflict claims or undermine the watermaster’s perceived neutrality in carrying out its duties, powers, and responsibilities under the LPV Judgment.

From: [LPV Watermaster](#)
To: [Ian Prichard](#)
Subject: RE: counsel answers
Date: Wednesday, March 13, 2024 3:09:33 PM
Attachments: [LPVWatermaster_WY2023_master.xlsx](#)
[Grether_Annual Allocations - Jan30.24.xlsx](#)

Hi Ian,

My apologies for not responding earlier as I was discussing your requests with County Counsel. I will address these separately:

- 1. Clarity on Mutual Exclusive Billing:** The Watermaster's notice on March 5 of the billing assessment went to all landowners with a WMID, including mutual exclusive landowners. Mutual exclusives' assessments are being collected by their mutual water company, per the Judgment, but the March 5 notice was silent on that process. The PAC heard in its March 7 meeting that there is some confusion among some mutual exclusives regarding this notice. **The PAC requests that Watermaster send a follow-up communication to clarify.** You could send an email to just the mutual exclusive WMIDs stating that their assessment will be collected by their mutual, or to all WMIDs stating that individual and hybrid mutual WMIDs assessments will be collected by the Watermaster directly and all mutual exclusives by their mutual. Watermaster sending the notice would ensure consistent messaging across all mutual water companies in the basin.

The Watermaster agrees for the need for clarification on the collection of Basin Assessments by Mutual Water Companies on behalf of the mutual exclusive shareholders per the Judgment. We will email the MWC and the exclusive shareholders a statement clarifying this and will draft a statement which will also be posted on the website. (Will try get this on the website by tomorrow)
- 2. Mutual Exclusive itemization:** The PAC requests that Watermaster **distribute to mutual water companies an Excel version of the table indicating which WMIDs belong to each mutual.** The PDF version that's publicly available is imperfectly sorted and clunky. It is assumed that the bill to the mutual exclusive will be itemized by WMID. It is understood that Watermaster has the Excel file. The PAC is simply requesting that this Excel file be distributed to the mutual water companies, as the Watermaster's partners in collecting assessments.

The Watermaster will provide the excel file to all MWC and the PAC. In addition, the Watermaster will also include the file sent by Rob Grether which is the file the Watermaster WMID designations are based on. Watermaster did not have this information and Rob Grether graciously offered to work with the Watermaster to designate WMIDs to the appropriate Mutual Water Companies. Please find both files attached to this email.
- 3. Late fees/nonpayment:** The Judgment is clear that Watermaster can collect assessments, after a period of failure to pay, from individual or mutual hybrid WMIDs through property tax. It is unclear what the mechanism will be for collecting late fees and unpaid assessments from

mutual exclusives. It is assumed that mutual water companies will report underpayments and non payments from mutual exclusives in their payment of the combined mutual assessment to the Watermaster. Is it the Watermaster's policy that mutual exclusives are to be responsible for collecting late fees and nonpayment from their mutual exclusive shareholders, or will the Watermaster employ the same tax mechanism for mutual exclusive WMIDs that it can for mutual hybrids and individuals?

The Judgment requires mutual water companies to pay basin assessments for their mutual exclusive shareholders. It also provides: "A Mutual Water Company's internal treatment of Basin Assessments and Overuse Assessments assessed on a Mutual Water Company is not controlled by this Judgment and is left to the internal governance of the Mutual Water Company." Also, this provision is consistent with FCGMA's past practice with collecting fees from MWCs and shareholders (i.e., FCGMA collects fees from MWCs for their shareholders' extractions). With these points in mind, the MWC should be responsible for paying all basin assessments and delinquencies for their mutual exclusive shareholders. If the MWC pays less than the amount of basin assessments owed by all of its exclusive shareholders, then the WM will issue a notice of delinquency to the MWC and will look to the MWC to pay that delinquency. We might want to put this request on the agenda to find a way forward.

Thank you,

LPV Watermaster

LPV Agricultural Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)	Annual Supplemental Allocation (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
1001	49 Acres Scholle Ranch LP		1100091010 1100091020 1100091030 1100120080 1100120160 1100120170	368.02	248.46	119.56	106.19	354.65	Hybrid	Del Norte
1002	Aggen Associates, LLC		1100141020 1100142010	164.71	158.61	6.10	5.42	164.03	N/A	N/A
1003	Aggen Partners, LP		1100142075 1100142140	219.09	148.03	71.05	63.10	211.13	Hybrid	Zone
1004	Samuel and Sylvia Alvarez Family Revocable Trust dated 02/20/1998, Samuel and Sylvia Alvarez, Trustees		1100200090	88.67	59.05	29.62	26.31	85.36	Exclusive	Zone
1005	Samuel and Sylvia Alvarez Family Revocable Trust dated 02/20/1998, Samuel and Sylvia Alvarez, Trustees		1100200080 1100200100	98.15	67.15	31.00	27.53	94.68	Exclusive	Zone
1006	Apricot Lane Farm Holdings, LLC	Main - Broadway	5030010025 5030010030 5030010040 5030010335 5030010395 5030020125 5030020260 5030020425	295.51	137.69	157.82	140.17	277.86	N/A	N/A
1007	Apricot Lane Farm Holdings, LLC	Stockton	1080170025 1080170035	67.72	57.57	10.15	9.01	66.58	N/A	N/A
1008	Bryce and Elaine Bannatyne Trust, Bryce Bannatyne, Trustee	Rancho Resplandor Sand Canyon	1100200240	27.43	27.31	0.12	0.11	27.42	N/A	N/A
1009	Bryce and Elaine Bannatyne Trust, Bryce Bannatyne, Trustee	Rancho Resplandor Moorpark	5020060010	219.05	92.96	126.09	111.99	204.95	N/A	N/A
1010	Bell Ranch Investors, LLC		1560180350 1560180360 1560180430	583.35	244.63	338.72	300.83	545.46	N/A	N/A
1011	John W. Borchard Ranches, Inc., a California corporation	Reiman Ranch	1100133230 1100133240	264.51	180.19	84.32	74.89	255.08	Exclusive	Zone
1012	John W. Borchard Ranches, Inc., a California corporation	Goodyear Ranch	1100133200 1100150115	67.49	45.98	21.52	19.11	65.09	Exclusive	Zone
1013	Berkshire Investments, LLC, a California limited liability company		5030050225 5030050245	81.00	47.86	33.13	29.42	77.28	N/A	N/A
1014	Berylwood Ranch, LLC, a California limited liability company		1100020090 1100020100	235.38	107.92	127.46	113.20	221.12	Exclusive	Zone
1015	Roberta Ann Bianchi Trust dated 04/25/1988, Roberta Ann Bianchi, Trustee		1100092170	43.28	43.28	0.00	0.00	43.28	Exclusive	Del Norte
1016	Roberta Ann Bianchi Trust dated 04/25/1988, Roberta Ann Bianchi, Trustee		1100092210	45.61	45.61	0.00	0.00	45.61	Exclusive	Del Norte

LPV Agricultural Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)	Annual Supplemental Allocation (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
1017	William A. Miller, Trustee of the William A. Miller Living Trust dated August 6, 2003, et al.		5030010090 5030010145 5030010165 5030010310 5030010405	224.48	134.26	90.22	80.13	214.39	N/A	N/A
1018	William A. Miller, Trustee of the William A. Miller Living Trust dated August 6, 2003, et al.		1080170090 5020020180 5030010325	41.51	18.47	23.04	20.46	38.93	N/A	N/A
1019	John W. Borchard, Jr., Trustee of the John W. Borchard, Jr. Trust dated May 12, 1971	Baptiste Ranch	1100170645	48.23	30.02	18.21	16.17	46.19	Exclusive	Zone
1020	Lauren A. Borchard, Trustee LAB Trust; Leslie K. Borchard	MCB Farms LLC, Greenhills Ranch	1090031185	89.95	52.65	37.30	33.13	85.78	Exclusive	Del Norte
1021	Lauren A. Borchard, Trustee for the LAB Trust; Leslie K. Borchard	MCB Farms LLC - Donlon 3 Ranch	1100420035	43.26	30.55	12.71	11.29	41.84	Exclusive	Rancho Canada
1022	Borchard, Patricia C. Trust, John Borchard Trustee		1090031175	99.92	62.29	37.62	33.41	95.70	Exclusive	Del Norte
1023	Broadway Road Moorpark, LLC, a Delaware limited liability company		5020020030	149.97	62.89	87.08	77.34	140.23	Exclusive	Thermic
1024	John S. Broome Trust dated June 1, 1967, John S. Broome, Jr., Trustee, et al.	Escabitas	1090050135 1090050205	214.57	149.58	64.99	57.72	207.30	N/A	N/A
1025	John S. Broome Trust dated June 1, 1967, John S. Broome, Jr., Trustee, et al.	Colina	1100200065	83.37	41.39	41.98	37.28	78.67	Hybrid	Zone
1026	Bruecker 2005 Revocable Family Trust, Kenneth A. and Juli A. Bruecker, Co-Trustees		5030060225 5030060235 5030060255 5030060325	87.15	68.42	18.73	16.63	85.05	N/A	N/A
1027	Burdullis Ranches LLC		1100420025	39.37	36.76	2.61	2.32	39.08	Exclusive	Rancho Canada
1028	Burdullis Ranches LLC		1100420045	37.22	30.79	6.43	5.71	36.50	Exclusive	Rancho Canada
1030	Green Hills Ranch, LLC	Green Hills Ranch	1090031065 1090031095 1090031125 1090031155	338.16	213.40	124.76	110.80	324.20	Exclusive	Del Norte
1031	Glen and Kim T. Carmichael, Co-Trustees of the Glen and Kim T. Carmichael Joint Living Trust and Carmichael Farms Trust		1070130195 1070130205 1070130255 1100100025	193.46	148.93	44.53	39.55	188.48	Hybrid	Del Norte
1032	John-Yon Chang		5030050320	230.66	100.48	130.17	115.61	216.09	N/A	N/A
1034	Ann Cooluris, Trustee of the Ann C. Cooluris Trust, et al.		1100150085	164.41	112.49	51.92	46.11	158.60	Exclusive	Zone
1035	Culbert Farms LLC; Cristina Marie Kildee; Delcia Ann Giacalone; Jennifer Elizabeth Kildee; Richard D. Culbert; Michael Kenneth Kildee; Kevin Bertis Kildee	Culbert 60 Ranch	1100142100	80.73	73.86	6.87	6.10	79.96	Exclusive	Zone
1036	D&D Coastal, LLC		1080180065	32.79	14.19	18.60	16.52	30.71	Hybrid	Balcom-Bixby
1037	DeBoni Corporation		1100141090	120.66	80.81	39.85	35.39	116.20	Hybrid	Zone
1038	DeBoni Corporation		1100092160 1100093010	116.22	105.01	11.21	9.96	114.97	Exclusive	Del Norte
1039	Dent Ranch, LP		5000210220	23.49	10.09	13.41	11.91	22.00	Exclusive	Thermic
1040	Leslie C. Dobson & Debra L. Dobson	Lot 3	1100230335	16.93	12.04	4.89	4.34	16.38	Hybrid	Las Lomas

LPV Agricultural Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)	Annual Supplemental Allocation (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
1041	US Horticulture Farmland		5030040255 5030040265 5030040285 5030040295	402.14	275.86	126.28	112.15	388.01	Hybrid	Berytwood
1042	Zachary Rastegar Farms, LLC	Shiloh Ranch	1070110035 1070110050 1070130030 1070130070 1100110075	240.22	141.95	98.27	87.28	229.23	N/A	N/A
1043	Isabella Rastegar Farms, LLC	Tara Ranch	1070120060 1070120215 1070120225 1070130145	181.17	107.06	74.12	65.83	172.89	Hybrid	Del Norte
1044	John Moffatt Grether, Trustee of the GST Exempt Exemption Trust and the Survivors Administrative Trust under the Grether Family Trust	Home 13	1090042130	15.39	15.39	0.00	0.00	15.39	Exclusive	Del Norte
1045	John W. Borchard, Jr and J. David Borchard, Co-Trustees of the Cecilia Borchard 1971 Trust for the benefit of John W. Borchard, Jr.	Perkins Ranch	1100120010	169.52	85.37	84.15	74.74	160.11	Exclusive	Zone
1046	Ernest Borchard Ranch Co., LLC, a California limited liability company	Thorpe Ranch	1100120060	200.41	148.36	52.05	46.23	194.59	Exclusive	Zone
1047	J. David Borchard and Michele A. Borchard, Co-Trustees of the J. David and Michele A. Borchard Family Trust dated September 25, 2014	DJB Ranch	1100160020	108.56	54.78	53.79	47.77	102.55	Exclusive	Zone
1048	John W. Borchard, Jr. and J. David Borchard, Co-Trustees of John's Exempt Residuary Trust, under the John W. Borchard 1986 Trust	Hawkins Ranch	1100131010	22.47	11.31	11.16	9.91	21.22	Exclusive	Zone
1049	John W. Borchard Jr. and Suzanne Borchard Kelly, Co-Trustees of the the Patricia C. Borchard Testamentary Trust for the benefit of John W. Borchard, Jr.	Knittles Ranch	1100133220 1100133250	96.58	65.44	31.15	27.67	93.11	Exclusive	Zone
1050	Dusty Lane LLC		1080100145	22.22	16.14	6.08	5.40	21.54	N/A	N/A
1051	Dusty Lane LLC		1100230255	25.47	18.50	6.97	6.19	24.69	Hybrid	Balcom-Bixby
1053	James D. Engel, Trustee for the James D. Engel and Kay A. Engel Trust Dated April 15, 1998	Quail Hill Enterprises, Inc.	5030020350	40.00	22.33	17.67	15.69	38.02	N/A	N/A
1054	Farmland Reserve, Inc.		5030060115 5030060155 5030060180	299.50	132.46	167.04	148.36	280.82	N/A	N/A
1055	Green Fuse Botanicals, LLC		5030040065	16.09	13.18	2.92	2.59	15.77	Exclusive	Berytwood
1056	Zachary Rastegar Farms, LLC		1070130080 1100110180	111.48	94.08	17.39	15.44	109.52	N/A	N/A
1058	Gwyn Goodman, Trustee for the Goodman Family Trust		1100071245 1100071255 1100072030	54.57	29.56	25.01	22.21	51.77	Exclusive	Berytwood
1059	James A. Waters, III, Trustee for The J&H Waters Revocable Trust Dated July 18, 2008 ; James A. Waters, III, Trustee for The Andrew Exempt Trust Dated June 29, 2012	Balcom Canyon Ranch	1080100025	134.58	97.74	36.84	32.72	130.46	Hybrid	Balcom-Bixby

LPV Agricultural Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)	Annual Supplemental Allocation (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
1060	James A. Waters, III, Trustee for The J&H Waters Revocable Trust Dated July 18, 2008; James A. Waters, III, Trustee for The Andrew Exempt Trust Dated June 29, 2012	Hawley Ranch	1100080100	143.26	77.24	66.02	58.64	135.88	Exclusive	Berywood
1061	James A. Waters, III, Trustee for The J&H Waters Revocable Trust Dated July 18, 2008	Bard Ranch	5030020370	35.00	20.10	14.90	13.23	33.33	N/A	N/A
1062	John Moffatt Grether, Trustee of the Helen B. Grether Trust, the GST Exempt Exemption Trust, and the Survivors Administrative Trust under the Grether Family Trust	Home Ranch	1090042120	105.74	102.65	3.08	2.74	105.39	Exclusive	Del Norte
1063	Elizabeth B. Grether Trust, Elizabeth B. Grether, Trustee		1550270255	150.40	119.05	31.36	27.85	146.90	Exclusive	Zone
1064	April First Trust dated 01/15/2001, John M. Grether and Elizabeth B. Grether, Trustees	Russell	1100092260	56.22	56.22	0.00	0.00	56.22	Exclusive	Del Norte
1065	April First Trust dated 01/15/2001, John M. Grether and Elizabeth B. Grether, Trustees	Rita	1100133085	29.60	16.85	12.75	11.32	28.17	N/A	N/A
1066	April First Trust dated 01/15/2001, John M. Grether and Elizabeth B. Grether, Trustees	Selia	1100141125	53.46	49.44	4.02	3.57	53.01	Exclusive	Zone
1068	Jose de Jesus and Maria de la Cruz Gutierrez, Joint Tenants		1100420095	21.06	10.97	10.09	8.96	19.93	Exclusive	Rancho Canada
1069	Jose de Jesus and Maria de la Cruz Gutierrez, Joint Tenants		1100420105	15.30	15.30	0.00	0.00	15.30	Exclusive	Rancho Canada
1070	Hacopian, Edward/Kristine		1100230215	25.00	20.50	4.50	4.00	24.50	Hybrid	Balcom-Bixby
1071	Hagel, Timothy et al	Meadows of Moorpark	1080161115	8.82	8.82	0.00	0.00	8.82	Hybrid	Balcom-Bixby
1072	Harris Endeavors, LLC		1100230145	31.63	16.60	15.03	13.35	29.95	N/A	N/A
1073	Higgins, Sunny May Trust et al	Snyder Ranch	1100150020 1610030030	216.71	102.41	114.30	101.51	203.92	Hybrid	Zone
1075	Jefferson Farms, LP		1080110330 1080180135 1080180145 1080180155 1100430105 1100430065 1100430095	663.37	285.26	378.10	335.81	621.07	N/A	N/A
1076	Michael D. and Merrie Kelley, Trustee for the Michael and Merrie 2008 Revocable Family Trust, dba Triangle K. Farms		1100040410 1100160195 1100160215 1100160225 1100170300	143.95	70.69	73.25	65.06	135.75	N/A	N/A
1077	Kirschbaum, LLC	La Loma Main Ranch	1090031035	257.00	161.36	95.64	84.94	246.30	Hybrid	Del Norte
1078	Kirschbaum, LLC	Balcom Canyon Ranch	1100230125	65.17	34.62	30.55	27.13	61.75	Hybrid	Las Lomas
1079	Lamb Trust, John B Lamb Trustee		1100100215 1100100235 1100100265	13.58	8.22	5.36	4.76	12.98	Exclusive	Del Norte
1080	Graham Somis Ranch, LLC	McKee Ranch	1100142085 1100142095	200.28	144.64	55.63	49.41	194.05	Hybrid	Zone

LPV Agricultural Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)	Annual Supplemental Allocation (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
1081	JG Leavens LLC and Leavens Ranches LLC		5000150115 5000150135 5000150145 5020010105 5020010115 5020030040 5020031095 5020031105 5020032045 5020040025 5020040075 5020040085 5020040095 5020040105 5020040205 5020050025 5020050035 5020050045 5020050055 5020050075 5020060035 5020060045 5020070030 5020070075 5020070085 5020070105 5020070115	1,877.76	787.45	1,090.31	968.35	1,755.80	N/A	N/A
1082	Los Angeles Avenue Ranch LP et al.		1090061040 1090061180 1090061200	512.55	216.36	296.19	263.06	479.42	N/A	N/A
1083	Lowe Family Trust dated 07/28/1996, David Hwei-Chung and Florence Ai-Lieng Lowe Trustees		1100420085	33.66	27.90	5.76	5.12	33.02	Exclusive	Rancho Canada
1084	Mahan Ranch, et al		1100060645 1100060695 1100071095 1100071115 1100071265	184.49	104.01	80.47	71.47	175.48	Hybrid	Berylwood
1085	Audelio Martinez and Renato Martinez	Escondido Ranch	1100040395 1100040405	245.52	122.76	122.76	109.03	231.79	N/A	N/A
1086	Audelio Martinez and Renato Martinez	GTO Ranch	1100150075	100.19	59.21	40.99	36.40	95.61	Hybrid	Zone
1087	Audelio Martinez and Renato Martinez	Inoberry Ranch	1100180360 1100180370	400.33	216.85	183.49	162.97	379.82	Hybrid	Zone
1088	Audelio Martinez and Renato Martinez	Luzmar Ranch	1100160245	50.39	36.71	13.68	12.15	48.86	Exclusive	Zone
1089	Audelio Martinez and Renato Martinez	Palace Ranch	1100170255	74.56	34.75	39.81	35.36	70.11	Exclusive	Zone
1090	Audelio Martinez and Renato Martinez	Patricia Ranch	1100120055	91.72	54.44	37.27	33.10	87.54	Exclusive	Zone
1091	Audelio Martinez	Sand Canyon - North	1100200220	23.80	23.80	0.00	0.00	23.80	Exclusive	Zone
1092	Audelio Martinez	Sand Canyon - North	1100200335	29.43	22.94	6.49	5.76	28.70	N/A	N/A

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1093	Audelio Martinez and Renato Martinez	Santa Rosa Ranch	1100160100	146.82	86.76	60.06	53.34	140.10	Exclusive	Zone
1094	Mastro Culbert Farms, LLC & Steven Mastro		5000130135 5000130155 5000130165 5000130175	232.40	109.86	122.54	108.83	218.69	N/A	N/A
1095	McGonigle Trust, John McGonigle		1090031025	130.05	78.65	51.41	45.66	124.31	Hybrid	Del Norte
1097	John R. Milligan Trust dated December 11, 1998, et al.		5040021260	344.67	144.54	200.13	177.74	322.28	N/A	N/A
1098	Mittag Farms	RC - Farms	1090050260 1090050370	307.89	307.89	0.00	0.00	307.89	N/A	N/A
1099	Mittag Farms	RMD - Farms	1100010010 1100010080 1100010145 1100132160 1100132240	1,089.46	904.97	184.49	163.85	1,068.82	Hybrid	Zone
1100	Mittag Ranches	Rancho Enrique	1090050330	226.22	196.55	29.67	26.35	222.90	N/A	N/A
1101	Mittag Ranches	RMD - Ranches	1100120130 1100120215 1100120220 1100132040 1100132150 1100132230 1100141130	613.66	576.75	36.91	32.78	609.53	Hybrid	Zone
1102	Mittag Ranches	RC - Ranches & Judith	1090061055 1090061135 1090061260	344.03	344.03	0.00	0.00	344.03	Hybrid	Zone
1103	Brian L. Moore Revocable Trust dated 10/30/2009, Brian L. Moore, Trustee		1100420075	33.84	33.84	0.00	0.00	33.84	Exclusive	Rancho Canada
1105	Benchmark Partners Ag, LLC		5030020245 5030030275	43.60	25.08	18.52	16.45	41.53	N/A	N/A
1106	Mueller Family Trust, Scott R. Mueller		1100420055	21.85	21.85	0.00	0.00	21.85	Exclusive	Rancho Canada
1108	Paul Naumes, Trustee for the Paul Naumes 2013 Living Trust, San Joaquin Door & Supply, Inc.		1080162125 1080162155 1080162175 1080162195 1080162205	82.14	42.71	39.43	35.02	77.73	N/A	N/A
1109	Charles R. and Kathleen M. Northcross Family Trust dated 05/27/2000, Charles and Kathleen Northcross, Trustees		1100420015	33.01	30.59	2.42	2.15	32.74	Exclusive	Rancho Canada
1110	Cohen Trust of 1990, dated 11/27/1990, and restated 08/05/2010, Marc S. Cohen and Lyn M. Cohen, Co-Trustees		1100010215	14.87	8.80	6.07	5.39	14.19	Exclusive	La Loma Ranch
1111	Oro Del Norte, LLC		1100092190	382.72	266.20	116.52	103.49	369.69	Exclusive	Del Norte
1112	Placco, LLC	PR1	1550270200 1550270275	272.58	168.20	104.38	92.70	260.90	Exclusive	Zone
1113	Placco, LLC	PR2	1100010155	58.54	44.34	14.20	12.61	56.95	Exclusive	La Loma Ranch

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1114	Placco, LLC	PR3	1630010270 1630010320 1630010330 1630010370 1630010420 1630010430 1630010440 1630010450 1630010460 1630010480	421.43	288.35	133.08	118.19	406.54	Hybrid	Arroyo Las Posas
1115	Placco, LLC	PR4	1550270215 1550270230 1550270280 1550270290 1550270305 1550270315 1550270325	518.58	330.45	188.13	167.09	497.54	Hybrid	Zone
1116	Quine Ranch LP		5000090185 1090032040	88.04	42.28	45.76	40.64	82.92	N/A	N/A
1117	Davidson Family Trust dated 09/23/1992, Jerry Davidson, Trustee		5030020225	42.40	24.52	17.87	15.87	40.39	N/A	N/A
1119	Mark Ratto, Trustee of the Mark Ratto Revocable Living Trust dated February 2, 2016		1100060635 1100200185	67.40	45.87	21.53	19.12	64.99	N/A	N/A
1120	RBV 2+5, LLC		1090032150 1090032160	56.38	48.82	7.55	6.71	55.53	Hybrid	Del Norte
1121	RBV-Vanoni, LLC		1090032170 1090042050 1090042100	189.55	167.74	21.81	19.37	187.11	Hybrid	Del Norte
1122	Frank Russell Ranch LP		1100092250 1100120250	135.70	81.29	54.40	48.31	129.60	Exclusive	Del Norte
1123	Santa Clara Avenue Oxnard, LP, a Delaware limited partnership		1090050240	298.41	180.36	118.05	104.85	285.21	N/A	N/A
1124	Santa Elena Farms, LLC, a California limited liability company		1090032135 1090032145	158.92	94.18	64.74	57.50	151.68	Exclusive	Del Norte
1125	Santa Paula Hay & Grain and Ranches, LLC	Waters Ranch	5030072055	64.69	27.13	37.56	33.36	60.49	Exclusive	Fuller Falls
1129	Santa Paula Hay & Grain and Ranches, LLC	Balcom Canyon (2018)	5030040120 5030040130 5030040140	237.02	162.17	74.85	66.48	228.65	Hybrid	Berywood
1132	John W. Borchard, Jr., Trustee of the John W. Borchard, Jr. Trust dated May 12, 1971	Mutinix Ranch	1100020130 1100020140	132.96	92.66	40.30	35.79	128.45	Exclusive	Zone
1133	John W. Borchard, Jr., Trustee of the John W. Borchard, Jr. Trust dated May 12, 1971	Ford Ranch	1100131020	111.70	56.26	55.44	49.24	105.50	Exclusive	Zone
1134	Chris Marcussen		5030020400	48.80	25.85	22.96	20.39	46.24	N/A	N/A
1135	Newman Trust dated 01/27/2000, Ronald Newman, Trustee		5030020300	29.43	17.10	12.33	10.95	28.05	N/A	N/A

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1136	James A. Fitzgerald Trust No. II, Brian Fitzgerald, Trustee	Fitzgerald Ranch	5030020135	29.83	17.08	12.75	11.32	28.40	N/A	N/A
1138	Seacoast Farms, LLC		1090041160 1090041180	692.97	497.71	195.26	173.42	671.13	N/A	N/A
1139	Gayl Family 1992 Trust, Robert Gayl, Trustee	Gayl Ranch	5030020340	29.51	26.22	3.30	2.93	29.15	N/A	N/A
1140	Sharlee C. Carnes; Meredith C. Horton; Michael E. Culbert	Culbert Home Ranch	1550270070 1550270095	75.57	66.01	9.56	8.49	74.50	Exclusive	Zone
1142	Stagola, Inc.	Balcom Ranch Road	1100220010	458.11	192.11	266.00	236.25	428.36	N/A	N/A
1143	Thomas Staben	Lemon Ranch	1630010805 1630010825 1630020765 1630020795	59.79	41.08	18.71	16.62	57.70	Exclusive	Zone
1144	Stevens Trust, Kathleen/Leon Scott Stevens		1090050385 1090050395 1090050405 1090050185	224.79	173.83	50.96	45.26	219.09	N/A	N/A
1145	Lee Stoeckle Living Trust dated 10/19/2009, Leo Stoeckle, Trustee		5000150125	88.40	40.25	48.15	42.76	83.01	N/A	N/A
1146	Richard Sundberg and Odelia Sundberg		5030040055	50.41	24.59	25.82	22.93	47.52	Exclusive	Berylwood
1148	Sunshine Agriculture, Inc.	Main Ranch	1100050010 1100050030	2,029.99	1,015.00	1,015.00	901.46	1,916.46	N/A	N/A
1150	John Moffatt Grether, Trustee of the GST Exempt Exemption Trust and the Survivor's Administrative Trust under the Grether Family Trust, dated September 12, 1989	Roberto	1100091040 1100120230	85.69	73.51	12.19	10.83	84.34	Hybrid	Del Norte
1151	Dorcas H. Thille, Trustee of the Dorcas H. Thille Trust		1090061070 1090061080 1090061150	148.13	109.45	38.67	34.34	143.79	Exclusive	Zone
1152	Tschirhart Trust, Donald/Jean		1080140285 1100040105 1100040165 1100040425	206.35	193.14	13.21	11.73	204.87	N/A	N/A
1153	Urban-D Ranch Limited Partnership		1100220050	157.93	93.77	64.16	56.98	150.75	Hybrid	Zone
1154	VH Farms LP		1100210330	31.85	17.96	13.88	12.33	30.29	Exclusive	Berylwood
1155	Joshua L. Waters, Trustee for the the Joshua Exempt Trust, et al.		5000210085 5000210095	87.33	46.31	41.02	36.43	82.74	Exclusive	Thermic
1156	Waters Ranch, LP		5000130070 5000130110	292.55	122.68	169.87	150.87	273.55	N/A	N/A
1157	Waters Ranch, LP		5000200040 5000210110 5000210240	348.16	164.12	184.04	163.45	327.57	Exclusive	Thermic
1158	Waters & Sons Farms LP	Waters & Sons Farms LP	1080170115 5000090165	93.55	51.54	42.00	37.30	88.84	N/A	N/A

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1159	Magana Ranch, LLC		1100060165 1100430025	145.38	68.59	76.79	68.20	136.79	N/A	N/A
1160	James D. Hearn and Shira C. Hearn, husband and wife	Jacoca Ranch	5030020200	24.73	24.73	0.00	0.00	24.73	N/A	N/A
1161	CE + D Mabry Family LP	Mabry Ranch	5030020165 5030020410 5030030290	89.62	51.25	38.37	34.08	85.33	N/A	N/A
1162	Patsy D. Waters, Trustee for the 1994 Bypass Trust		5000210105	90.49	45.01	45.48	40.39	85.40	Exclusive	Thermic
1163	Ronald and Nickoletta Partain Family Trust, Ronald Partain, Trustee	Wild Swan Ranch	5030020145	30.83	16.70	14.13	12.55	29.25	N/A	N/A
1166	Wise Orchards at Somis LLC	Somis Orchards	1100060385	92.85	42.87	49.97	44.38	87.25	N/A	N/A
1167	Wise Orchards at Somis LLC	Wise Orchards I	5030040085	43.30	26.80	16.50	14.65	41.45	Exclusive	Berylwood
1169	Wonderful Citrus, LLC		1100010065	417.67	285.77	131.89	117.14	402.91	N/A	N/A
1170	Lemon 500, LLC		1120010025 1120010035 1120010045 1120010055 1120010065 1120010075 1120010085 1120010095 1120010105 1120010115 1120010125 1120010135 1120020025 1120020035 1120020045 1120020055 1120020065 1120020075 1120020085 1120020095 1120020105	1,126.03	770.44	355.59	315.81	1,086.25	N/A	N/A
1171	Yong, Jeffrey		1080162055 1080170015 5030010080 5030010415	117.26	99.47	17.79	15.80	115.27	N/A	N/A
1178	Audelio Martinez and Renato Martinez	Somis Ranch	1610060015	73.78	40.82	32.97	29.28	70.10	Exclusive	Zone
1179	Ali Seyedi Revocable Trust dated 12/30/2019, Ali Seyedi, Trustee		1100420065	38.71	20.14	18.57	16.49	36.63	Exclusive	Rancho Canada
1180	JJM Somis Ranch, LLC	JJM Somis	1100150105	78.32	70.22	8.10	7.19	77.41	Exclusive	Zone
1181	Charles and Mary Wehrheim, Co-Trustees of the Wehrheim Family Trust		5030050365 5030050390	79.91	47.61	32.30	28.69	76.30	N/A	N/A

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1188	Larry Raymond, as Trustee of the Rayday Survivors' Trust		5030020320	35.02	23.01	12.01	10.67	33.68	N/A	N/A
1189	Timothy Hoke and Barbara Hoke		5030060145	46.55	21.77	24.78	22.01	43.78	N/A	N/A
1190	Gordon and Luanne Hilton		5030020330	36.88	21.52	15.37	13.65	35.17	N/A	N/A
1191	Brian A. Lee and Maria G. Lee as Trustees of the Lee Family Trust	Empty Saddle Ranch	5030020150	36.65	21.80	14.84	13.18	34.98	N/A	N/A
1192	JRRE Horizon LLC	Rancho Vista Alegre	1100230405	66.52	39.26	27.26	24.21	63.47	N/A	N/A
1193	Thomas A. Kestly, as Trustee for the Thomas A. Kestly Family Trust 2003	K-1 Ranch a.k.a. Kestly AG	5030030305	37.97	22.54	15.43	13.70	36.24	N/A	N/A
1194	Alfonso Gonzalez, Trustee of the Alfonso Gonzalez 2013 Separate Property Trust	Rancho San Jan	5030060285	24.91	24.91	0.00	0.00	24.91	N/A	N/A
1195	Brian A. Lee and Maria G. Lee as Trustees of the Lee Family Trust	Rancho Maria	5030020360	25.43	23.45	1.99	1.77	25.22	N/A	N/A
1196	Lynch Land & Cattle, LLC, et al.	Lynch Ranch	1080110310 1080110320 1080110340	37.99	37.99	0.00	0.00	37.99	N/A	N/A
1197	Charles Blanc		5030020185	28.71	20.80	7.91	7.03	27.83	N/A	N/A
3101	Westfield Farms		1630020415	22.91	15.66	7.26	6.45	22.11	Exclusive	Arroyo Las Posas
3102	Spencer E. Love		1630010620	28.07	19.18	8.89	7.90	27.08	Exclusive	Arroyo Las Posas
3103	Spencer E. Love		1630020565	1.34	0.91	0.42	0.37	1.28	Exclusive	Arroyo Las Posas
3104	Roy T. Butera, Trustee of the Butera Family Trust dated March 9, 1998		1630020605	28.44	19.43	9.00	7.99	27.42	Exclusive	Arroyo Las Posas
3105	Kirpal Dhaliwal, et al.		1630020550	23.25	15.89	7.36	6.54	22.43	Exclusive	Arroyo Las Posas
3106	Keith and Laura Huss, Trustees of the Huss Family Trust dated October 22, 2013		1630010755	34.23	23.39	10.84	9.63	33.02	Exclusive	Arroyo Las Posas
3107	Joseph W. and Lisa Sutter, Trustees of the Sutter Family Trust u/d/t dated October 27, 2007		1630020250 1630020280 1630020290	12.17	8.32	3.85	3.42	11.74	Exclusive	Arroyo Las Posas
3110	Jesus Jr. and Maribel Aguilera, Trustees of Aguilera Family 2015 Revocable Trust dated February 11, 2015		1630020210	43.74	29.89	13.85	12.30	42.19	Exclusive	Arroyo Las Posas
3111	Glen R. Carmichael and Kimberly T. Carmichael, Trustees of the Glen Carmichael and Kimberly Carmichael Joint Living Trust		1630010290	42.88	29.30	13.58	12.06	41.36	Exclusive	Arroyo Las Posas
3112	Chirag and Khushbu Dalsania		1630020585	28.21	19.27	8.93	7.93	27.20	Exclusive	Arroyo Las Posas
3113	Benjamin and Leonila Vazquez		1630020200	33.01	22.56	10.45	9.28	31.84	Exclusive	Arroyo Las Posas
3114	Alan Clark Goddard and Deborah Lynne Goddard		1630020270	0.12	0.08	0.04	0.04	0.12	Exclusive	Arroyo Las Posas
3201	8201 Bixby Road LLC		1080180045 1080180085	55.12	36.44	18.68	16.59	53.03	Exclusive	Balcom-Bixby
3203	Tom & Ruth Millington		1080100155	4.72	2.44	2.29	2.03	4.47	Hybrid	Balcom-Bixby
3204	Patty Grubman (The City Farm)		1080180075 1080180095	20.83	16.84	3.99	3.54	20.38	Hybrid	Balcom-Bixby
3205	Waters Family Ranches Oasis - Caldwell Morris K Tr		1100060465	23.94	23.94	0.00	0.00	23.94	Hybrid	Balcom-Bixby
3206	John & Cynthia Schoustra		1100060455	28.12	28.12	0.00	0.00	28.12	Hybrid	Balcom-Bixby
3207	Marlene Valter		1100230045	0.89	0.89	0.00	0.00	0.89	Hybrid	Balcom-Bixby
3210	Mark Ellrott		1080161105	1.85	1.85	0.00	0.00	1.85	Hybrid	Balcom-Bixby
3301	Aceves, Jose L. and Donald M. Herman (Plants Plus)		1100071040	16.35	10.11	6.24	5.54	15.65	Exclusive	Berylwood
3302	Shen, Xiaoyang		1100072040	18.72	13.21	5.51	4.89	18.10	Exclusive	Berylwood

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3304	Weider, Eric & Renee Lynn (6/28/21 VIK Holdings, LLC)		5030040175	70.62	41.31	29.32	26.04	67.35	Exclusive	Berytwood
3305	Ventura County Nursery		1100220075	16.74	8.02	8.72	7.74	15.76	Exclusive	Berytwood
3306	McMahon, Julian		1100210320	36.13	15.15	20.98	18.63	33.78	Exclusive	Berytwood
3307	Balcom Canyon Ranch, LLC c/o Matthew Lamishaw		1100210100	42.19	29.87	12.32	10.94	40.81	Exclusive	Berytwood
3309	Avalos, Heliodoro and Yadira Trustees (Laguna - Posita Ranch)		1100072050	28.17	11.81	16.36	14.53	26.34	Exclusive	Berytwood
3310	Berney, Charles and Carol		1100080015 1100080060	40.81	30.20	10.61	9.42	39.62	Exclusive	Berytwood
3312	Hameed, Rashid & Salmeen		1100071185	16.28	12.12	4.16	3.69	15.81	Exclusive	Berytwood
3313	Servin, Vincent W. Trust, pledged CCFLB		5030040045	58.38	34.10	24.28	21.56	55.66	Exclusive	Berytwood
3316	Maryann McCormick		1100072060 1100080080	65.37	34.58	30.79	27.35	61.93	Exclusive	Berytwood
3319	Foulkrod, Marc J. & Jamie Foulkrod Trustees		1100080075	21.57	15.07	6.50	5.77	20.84	Exclusive	Berytwood
3321	Ivan and Jennifer Amodei Family Trust		1100210270	45.64	33.45	12.19	10.83	44.28	Exclusive	Berytwood
3323	Becerra Roberto and Maria Trustees, pledged to CCFLB		5030040225	48.96	24.27	24.69	21.93	46.20	Exclusive	Berytwood
3330	Lim, Basilio And Rosie Chu Lim Trustees, pledged to CCFLB		5030040180 5030040200	92.70	45.72	46.98	41.72	87.44	Exclusive	Berytwood
3331	Miguel Magdaleno, Trustee of the Miguel Magdaleno Living Trust Dated April 4, 2002		1630020745 1630020755 1630020775 1630020785 1630031365 1630031375	466.19	263.40	202.79	180.11	443.51	Hybrid	Berytwood
3333	Javier A. Rodriguez and Gabrielle R. Rodriguez, husband and wife as community property with right of survivorship		1100071155	7.55	4.35	3.20	2.84	7.19	Exclusive	Berytwood
3334	Kapigian, John and Linda, pledged to Ames & Marjorie Borrell		1100071205	4.82	3.76	1.06	0.94	4.70	Exclusive	Berytwood
3335	Baron, Richard A. & Sandra		5030040195 5030040215	38.50	28.62	9.88	8.77	37.39	Exclusive	Berytwood
3338	Valley Growers (Under Tash APN)		1100220085	27.36	15.32	12.05	10.70	26.02	Exclusive	Berytwood
3342	Gatling, Richard E. or Bonnie L. Gatling		1100072070	13.03	12.26	0.77	0.68	12.94	Exclusive	Berytwood
3343	Rosales, Rojalio		1100071050	17.90	10.17	7.73	6.87	17.04	Exclusive	Berytwood
3344	Sasaki and Suzuki, pledged to Equitable (Laguna Sasaki)		1100072020	31.49	13.20	18.28	16.24	29.44	Exclusive	Berytwood
3345	Tash Trust, George and Debra as Trustees		1100210290	51.61	21.64	29.97	26.62	48.26	Exclusive	Berytwood
3346	Lucas, Thomas and Kim Dartlene Staats		5030040035	51.54	21.89	29.65	26.33	48.22	Exclusive	Berytwood
3501	Biocca, Siro		1090032120	41.07	41.07	0.00	0.00	41.07	Exclusive	Del Norte
3502	Bliss Trust		1100100155	21.00	21.00	0.00	0.00	21.00	Exclusive	Del Norte
3503	Brown, Nicholas		1100110150	3.86	1.62	2.24	1.99	3.61	Exclusive	Del Norte
3504	Friel Las Posas LLC		1100092155	58.45	49.55	8.90	7.90	57.45	Exclusive	Del Norte
3505	Lewis, James		1100100145 1100100160	25.49	18.46	7.03	6.24	24.70	Exclusive	Del Norte
3506	Milligan Ranch Partnership, LP		1100092140 1100092230	175.32	141.10	34.22	30.39	171.49	Exclusive	Del Norte
3507	Plum Vista		1090042065	227.27	227.27	0.00	0.00	227.27	Exclusive	Del Norte
3508	R Attilio/D Vanoni			109.83	78.98	30.85	27.40	106.38	Exclusive	Del Norte
3509	Thompson, Brian		1100110145	14.71	11.29	3.41	3.03	14.32	Exclusive	Del Norte

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3510	Vorbeck, Alexandra		1100100225 1100100245 1100100255	17.98	13.13	4.85	4.31	17.44	Exclusive	Del Norte
3511	Wilhite, R.J.		1100092115 1100092135	35.50	25.02	10.48	9.31	34.33	Exclusive	Del Norte
3601	Bought The Farm, LLC	Lot 01	5030071035	30.40	12.75	17.65	15.68	28.43	Exclusive	Fuller Falls
3602	Katherine Cannon & Oliver Hutchinson	Lot 02	5030071025	29.10	19.46	9.64	8.56	28.02	Exclusive	Fuller Falls
3603	Rodney A. Spicer & Suzan R. Hall-Spicer	Lot 03	5030071015	1.45	1.02	0.43	0.38	1.40	Exclusive	Fuller Falls
3605	Guzman Investments and Loan Inc.	Lot 05	5030072135	33.36	21.76	11.60	10.30	32.06	Exclusive	Fuller Falls
3606	Jeffrey S. Yong & Margaret K. Yong	Lot 06	5030072145	86.91	52.31	34.60	30.73	83.04	Exclusive	Fuller Falls
3607	Luzyro, LLC	Lot 07	5030072075	45.29	29.88	15.41	13.69	43.57	Exclusive	Fuller Falls
3608	Mustang Creek Ranch, LLC	Lot 08	5030072155	70.83	29.84	40.99	36.40	66.24	Exclusive	Fuller Falls
3609	PenMeg LLC	Lot 09	5030072325	126.44	55.21	71.22	63.25	118.46	Exclusive	Fuller Falls
3610	Walter E. Johnson and Dawn-Marie Johnson, Trustees of the Johnson Family Trust	Lot 10	5030072285	53.93	25.12	28.81	25.59	50.71	Exclusive	Fuller Falls
3611	Vista 11, LLC	Lot 11	5030072305	64.42	37.03	27.40	24.34	61.37	Exclusive	Fuller Falls
3612	Patrice McNicoll	Lot 12	5030072255 5030072265	73.43	39.75	33.68	29.91	69.66	Exclusive	Fuller Falls
3613	GFO, LLC	Lot 13	5030072195 5030072275	116.89	54.58	62.31	55.34	109.92	Exclusive	Fuller Falls
3614	Josep J. Bilic, Trustee of the Bilic Living Trust Dated April 10, 1984	Lot 14	5030072205	59.49	29.25	30.24	26.86	56.11	Exclusive	Fuller Falls
3615	Fremont HGS, LLC	Lot 15	5030072215	61.95	27.05	34.90	31.00	58.05	Exclusive	Fuller Falls
3616	Moshe Ben-Dayam & Stephanie McColgan	Lot 16	5030072225	56.34	23.63	32.72	29.06	52.69	Exclusive	Fuller Falls
3617	Geraldine P. Berns, Trustee of the Geraldine P. Berns Family Trust No. One Established April 17, 1987	Lot 17	5030072035	64.88	27.21	37.67	33.46	60.67	Exclusive	Fuller Falls
3618	PenMeg, LLC	Lot 18	5030072095	56.88	29.98	26.91	23.90	53.88	Exclusive	Fuller Falls
3619	Mark A. Mallas and Dawn-Marie Johnson, Trustees of the Mallas Family Trust Dated 7-9-1991, and Mark A. Mallas	Lot 19	5030072105	54.19	29.29	24.90	22.11	51.40	Exclusive	Fuller Falls
3620	GFO, LLC	Lot 20	5030072235	119.18	51.74	67.44	59.90	111.64	Exclusive	Fuller Falls
3702	Steve George and Michele R. George, Trustees of the George Family Revocable Trust, dated January 25, 2005		1100010175	21.97	21.66	0.31	0.28	21.94	Exclusive	La Loma Ranch
3703	Ronald V. Boch and Lois R. Boch, Trustees of the Boch Family Revocable Trust dated November 4, 1998		1100010185	48.14	25.44	22.70	20.16	45.60	Exclusive	La Loma Ranch
3704	Steve George and Michele R. George, Trustees of the George Family Revocable Trust, dated January 25, 2006		1100010195	24.96	24.96	0.00	0.00	24.96	Exclusive	La Loma Ranch
3705	Bruce Bennett and Patricia Conway Bennett, Trustees of the Bruce Bennett and Patricia Conway Bennett Trust established January 7, 2007		1100010205	12.57	12.57	0.00	0.00	12.57	Exclusive	La Loma Ranch
3801	Timothy W. Huddleston and Lisa M. Huddleston	Lot 1	1100230315	11.61	11.61	0.00	0.00	11.61	Exclusive	Las Lomas
3802	Claude R. Goodman & Loraine S. Goodman, Trustees of The Claude R. Goodman and Loraine S. Goodman Family Trust, dated September 25, 2003	Lot 2	1100230325	1.09	1.01	0.08	0.07	1.08	Exclusive	Las Lomas

LPV Agricultural Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)	Annual Supplemental Allocation (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
3804	Charles R. Knowles Jr. and Marie L. Knowles, Trustees, or their successors in trust of the Knowles Family Trust D.T.D. 3/9/93	Lot 4	1100230305	30.06	21.88	8.17	7.26	29.14	Exclusive	Las Lomas
3807	Paul R. Jacques	Lot 7	1100230365	0.59	0.55	0.04	0.04	0.59	Exclusive	Las Lomas
3808	Kathleen Reinhard, Trustee of the Bruder-Reinhard Family Trust-Survivor's "A" Trust	Lot 8	1100230375	13.22	12.00	1.22	1.08	13.08	Exclusive	Las Lomas
3901	James E. Pierce	Somis Nursery	1100420115	16.71	7.01	9.70	8.61	15.62	Exclusive	Rancho Canada
4101	Miguel Magdaleno, Jr., Trustee of the Magdaleno Living Trust dated April 4, 2002		5000140065	17.16	10.12	7.04	6.25	16.37	Exclusive	Thermic
4102	Louis McCutcheon and Anne McCutcheon		5000140095	56.57	29.15	27.42	24.35	53.50	Exclusive	Thermic
4103	Romas		5000140015	306.21	128.41	177.80	157.91	286.32	Exclusive	Thermic
4201	AMS Craig LLC, a Delaware limited liability company		1100210120	23.11	18.64	4.46	3.96	22.60	Hybrid	Zone
4202	Marshall T. Allen and Concepcion V. Allen, as co-trustees of the Marshall T. Allen and Concepcion V. Allen 1990 Revocable Inter Vivos Trust u/d/t dated December 5, 1990		1100170375 1100170385	12.38	12.26	0.12	0.11	12.37	Exclusive	Zone
4203	Benjamin C. Vasquez and Leonila C. Vasquez, Trustees of the Vazquez Trust dated July 7, 2021, as community property		1100150040	28.55	15.29	13.26	11.78	27.07	Exclusive	Zone
4205	Mariette L. Menne, Trustee of The Patricia A. Menne Survivor's Trust, created for the benefit of the surviving spouse, under the terms of The David and Patricia Menne Family Trust Dated August 23, 1999, as Amended		1550270035	87.07	87.07	0.00	0.00	87.07	Exclusive	Zone
4208	Ehud Ariav Enterprises, Inc.		1100170565	22.00	22.00	0.00	0.00	22.00	Exclusive	Zone
4209	Agoure Ranch, LLC		1100200215	64.00	64.00	0.00	0.00	64.00	Exclusive	Zone
4210	Fred A Sharl, Ernest R Nichols, Arthur L Nichols, Vincent E Gisler		1100120180	154.98	106.68	48.30	42.90	149.58	Exclusive	Zone
4211	Helen Elaine Cavaletto, Trustee of the Cavaletto Survivor's Trust dated December 29, 2013, 403 shares; Richard Cavaletto and Melanie Cavaletto, Trustees of the Cavaletto Trust dated December 29, 2014, 57 shares; Gregory C. Hanger and Christina M. Hanger, Trustees of the Hanger Trust dated March 19, 2009, 57 shares		1100120035	93.15	64.09	29.06	25.81	89.90	Exclusive	Zone
4213	Soon Ja Lee, as Trustee of The Lee Family Trust, dated March 19, 1988		1100150065	54.44	35.77	18.67	16.58	52.35	Exclusive	Zone
4214	Karen P. Green, a married woman as her sole and separate property, and Cynthia A. Burdullis, an unmarried woman, each as to an undivided 50% interest as tenants-in-common		1100141065 1100141075	76.88	37.31	39.57	35.14	72.45	Exclusive	Zone
4215	Marilyn E. Smith, Trustee, Marilyn E. Smith 1997 Revocable Trust dated May 14, 1997		1100141080	18.77	11.74	7.03	6.24	17.98	Exclusive	Zone
4216	Price Road Ranch Partners, LLC		1100141100 1100141140	105.97	81.68	24.30	21.58	103.26	Exclusive	Zone

LPV Agricultural Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)	Annual Supplemental Allocation (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
4217	Rancho Limonada LLC		1100170330 1100170340 1100170350 1100170405 1100170445 1100170505 1100170525 1100170545	211.86	137.47	74.39	66.07	203.54	Exclusive	Zone
4220	Elizabeth Pajka		1100160185 1100160205	14.63	6.13	8.49	7.54	13.67	Exclusive	Zone
4221	Urban-D Ranch Limited Partnership		1610050030	23.57	9.89	13.69	12.16	22.05	Exclusive	Zone
4225	Terry Noriega, as Trustee of the Noriega Family Trust dated January 26, 1996		1610010180	42.21	32.41	9.80	8.70	41.11	Exclusive	Zone
4226	Terry Noriega, as Trustee of the Noriega Family Trust dated January 26, 1996		1610010170	47.76	33.03	14.73	13.08	46.11	Exclusive	Zone
4228	AMS Craig LLC, a Delaware limited liability company		1100200255	22.79	21.56	1.23	1.09	22.65	Exclusive	Zone
4232	The Lim Family Trust U/D/T 02-01-90, Basilio Y. Lim, Trustee and Rosie C. Lim, Trustee		1100200195	40.05	20.42	19.63	17.43	37.85	Exclusive	Zone
4233	Donal N. Ziemer and Ann L. Ziemer, Trustees of the Ziemer Family Trust established November 14, 1980		1560121050	20.02	9.65	10.37	9.21	18.86	Exclusive	Zone
4237	DFK Corporation, a California Corporation		1100141045 1100141110	100.82	100.82	0.00	0.00	100.82	Exclusive	Zone
4242	George Tash and Debra B. Tash, Trustees of the Community Trust created under the George Tash and Debra B. Tash Intervivos Trust Agreement dated Nov. 25, 1985, fully reinstated May 19, 1999		1100170585	46.57	30.54	16.03	14.24	44.78	Exclusive	Zone
4244	Highwood Farms LLC		1100352020	32.57	20.37	12.20	10.84	31.21	Exclusive	Zone
4245	James E. Pierce and Janice Pierce, Trustees of the James E. Pierce and Janice Pierce Revocable Trust, established August 15, 2003		1100390045	19.24	19.24	0.00	0.00	19.24	Exclusive	Zone
4247	Somis Farm, LLC		1100150050	78.30	45.52	32.79	29.12	74.64	Exclusive	Zone
4253	Little Bison Farm LLC		1100170180	90.51	44.09	46.43	41.24	85.33	Exclusive	Zone
4257	Eppy Ranch, LLC		1550270055	29.17	23.43	5.74	5.10	28.53	Exclusive	Zone
4259	Nancy D. O'Reilly		1100200305	0.99	0.99	0.00	0.00	0.99	Exclusive	Zone
4260	Nicandro Luna and Ernestina Luna, husband and wife, as joint tenants		1100240115	1.83	0.92	0.91	0.81	1.73	Exclusive	Zone
4261	Paul D. Burns and Lisa A. Burns, Co-trustees of the Paul and Lisa Burns Family Trust		1630010495 1630010815 1630010835	16.46	6.90	9.56	8.49	15.39	Exclusive	Zone
4262	Rancho Largo, LLC		1100120155	28.62	28.62	0.00	0.00	28.62	Exclusive	Zone
4263	Benjamin Vasquez and Leonila C. Vasquez, husband and wife as joint tenants		1100220040	104.35	66.68	37.67	33.46	100.14	Hybrid	Zone
4264	James R. Thiessen, an unmarried man; James R. Thissen, Trustee of the James R. Thiessen Trust dated November 30, 2012		1100180145 1100180165	17.93	16.28	1.64	1.46	17.74	Exclusive	Zone
	Total Agricultural Allocations			34,332.69	21,400.98	12,931.69	11,485.17	32,886.15		

LPV Domestic Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
4229	Arnold and Sandra Peterson, husband and wife as joint tenants		1100382215	2.03	1.94	Exclusive	Zone
1186	Bill Poole		1100230235	1.00	0.96	Hybrid	Balcom-Bixby
1177	Butler Ranch Mutual Water Company (Domestic - Conditional)		Exhibit G	24.00	0.00	N/A	N/A
3400	Crestview Mutual Water Company (Domestic)		Exhibit E	717.00	686.48	N/A	N/A
3536	Del Norte Water Company (Domestic - Conditional)		Exhibit H	25.00	0.00	Exclusive	Del Norte
3535	Del Norte Water Company (Domestic)		Exhibit F	48.99	46.90	Exclusive	Del Norte
3332	Ehrhardt, Louis and Patricia, pledged to Weyehaeuser Mortgage		1100080090	1.00	0.96	Exclusive	Berylwood
1185	Fox Canyon Farms, LLC		1100230285	1.00	0.96	N/A	N/A
4239	Frank Keith McCallion and Janell Case		1100240105	1.73	1.66	Exclusive	Zone
1182	Hagel, Timothy et al	Meadows of Moorpark	1080161115	1.00	0.96	N/A	N/A
1074	Hypericum Land Company LLC; Hypericum Interests LLC (Domestic - Conditional)		Exhibit G	24.00	0.00	N/A	N/A
1131	James A. Waters III, Trustee For The J&H Revocable Trust; James A. Waters III, Trustee For The Andrew Exempt Trust	Balcom Canyon Ranch	1080100025	1.08	1.03	N/A	N/A
3706	John R. Mathes, Trustee of the Jhn R. Mathis Trust U/T/A Dated August 7, 1992	Lot 8	1100110195	3.44	3.29	Exclusive	La Loma Ranch
1183	Julie Rhoads		1100230055	1.05	1.01	N/A	N/A
1184	Marlene Valter		1100230045	1.00	0.96	N/A	N/A
4258	Michael A. Spahr and Jeanne M. Spahr, Trustees of the Spahr 2000 Family Trust Dated May 10, 2000		1100240225	1.84	1.76	Exclusive	Zone
4267	Michael James Kytlica and Vladimir Ian Kytlica		1100240485	1.36	1.30	Exclusive	Zone
1107	Mittag Ranches	RC - Domestic Well	1090061260	1.00	0.96	N/A	N/A
3308	The Kirstin K. Doss Trust		1100071175	2.69	2.58	Exclusive	Berylwood
1187	Waters Family Ranches Oasis - Caldwell Morris K Tr		1100060465	1.00	0.96	N/A	N/A
	Total Domestic Allocations			788.21	754.65		

LPV Commercial Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
3208	Anderson Trust		1080110120	Yes	Exclusive	5.44	5.21	Exclusive	Balcom-Bixby
3805	Catherine Hill, Trustee of the Hill Trust # 2 U/A Dated March 28, 1998	Lot 5	1100230345	Yes	Exclusive	2.79	2.67	Exclusive	Las Lomas
1104	City of Moorpark		5060010280 5060010640	No	N/A	96.76	92.64	N/A	N/A
1200	City of San Buenaventura			No	N/A	57.86	55.40	N/A	N/A
1033	Claridge, Gail, Claridge Family Trust		1100210030 5030030155 5030073025	Yes	Exclusive	13.52	12.94	Exclusive	Berytwood
1141	Fox Canyon Farms, LLC		1100230285	Yes	Hybrid	17.84	17.08	Hybrid	Balcom-Bixby
3701	George Steve T		1100010165	Yes	Exclusive	5.91	5.66	Exclusive	La Loma Ranch
3329	Gerardi, Danny		1100210280	Yes	Exclusive	9.27	8.88	Exclusive	Berytwood
1057	Golf Realty Fund, LP	Spanish Hills Country Club	1520242275 1520242305 1520251365 1520252015 1520261035 1520261075 1520261095 1520261105 1520261115 1520261125 1520261135 1520261145 1520261155 1520262075 1520281165 1520283065	No	N/A	201.23	192.66	N/A	N/A
3202	Julie Rhoads		1100230055	Yes	Hybrid	10.55	10.10	Hybrid	Balcom-Bixby
3325	Marschewski, Thomas A. and Alison Rae Choate Marschewski		1100071145	Yes	Exclusive	7.02	6.72	Exclusive	Berytwood
3318	Maskrey, Francis and Joan		1100210240	Yes	Exclusive	25.24	24.17	Exclusive	Berytwood
1096	Mesa Union School District		1090050320 1090050340 1090050350 1090050360	Yes	Hybrid	17.00	16.28	Hybrid	Del Norte
1130	Saticoy Partners, LLC	Saticoy CC Golf	1090020150 1090020170 1090020285 1090020290 1090311080 1090340040	No	N/A	304.66	291.69	N/A	N/A

LPV Commercial Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
1137	Saticoy Properties LLC/Grimes Rock Inc * Transfer of this Allocation Basis is limited to 50% of the total.		5000050135 5000090055 5000090260 5000090270 5000090280 5000090290 5000090325 5000090355 5000090365	No	N/A	180.00	172.34	N/A	N/A
1147	Sunshine Agriculture, Inc.	Stines Property	1100230355	Yes	Exclusive	1.53	1.46	Exclusive	Las Lomas
3340	The Azmoun Family Trust 2003		1100071275	Yes	Exclusive	4.96	4.75	Exclusive	Berylwood
2011	Ventura County Waterworks District No. 1 - ELPMA		N/A	N/A	N/A	2,661.76	2,548.44	N/A	N/A
2191	Ventura County Waterworks District No. 19 - ELPMA		N/A	N/A	N/A	499.71	478.44	N/A	N/A
2192	Ventura County Waterworks District No. 19 - WLPMA		N/A	N/A	N/A	1,990.46	1,905.72	N/A	N/A
1172	ZIP TWO, LLC		1110010025 1110010035 1110010065 1110010075 1110010095 1110010115 1110010125	No	N/A	326.52	312.62	N/A	N/A
Total Commercial Allocations						6,440.03	6,165.87		

LPV Mutual Water Company Allocations (03/04/2024)

WMID	Mutual Water Company	Mutual Water Company Allocation	Annual Allocation (AF) Water Year 2023
3100	Arroyo Las Posas Mutual Water Company	0.00	0.00
3200	Balcom-Bixby Water Association Inc., a California corporation	27.02	24.00
3300	Berylwood Heights Mutual Water Company	46.43	41.24
3500	Del Norte Water Company	40.34	35.83
3600	Fuller Falls Mutual Water Company	0.00	0.00
3700	La Loma Ranch Mutual Water Company	0.00	0.00
3800	Las Lomas Mutual Water Company	0.00	0.00
3900	Rancho Canada Water Company LLC	0.00	0.00
4100	Thermic Mutual Water Company	0.00	0.00
4200	Zone Mutual Water Company	103.84	92.22
Total Mutual Water Company Allocations		217.64	193.29

Gene West, Chair
Fox Canyon Groundwater Management Agency/Las Posas Basin Watermaster

March 14, 2024

Chair West:

On February 29th 2024, the Watermaster submitted to the PAC the draft 2024 Las Posas Basin Groundwater Sustainability Plan (GSP) Annual Report for committee consultation. This letter serves as our Recommendation Report. The PAC has the following recommendations.

- 1. Request a 60-day extension on submission of the annual report to the California Department of Water Resources (DWR).** In addition to the following specific comments, PAC members found errors and had questions regarding the contour maps and various other portions of the annual report. Given the subject matter, much of the report is beyond individual PAC members' ability to comment on substantively; given the compressed timeline, it was infeasible to get secondary review by technical experts. The PAC's nominees for the Watermaster Technical Advisory Committee were recently confirmed by the Watermaster. **The PAC believes it would be in the best interest of the Basin for the TAC to review the annual report.** Due to the unique circumstances of being the first filed and currently only settled adjudication after the passage of the Sustainable Groundwater Management Act (SGMA); to the requirements of the Judgment; and to where we are in adhering to the Judgment, in terms of having just constituted the TAC, the PAC considers it fully justifiable to request from DWR a 60-day extension beyond the April 1, 2024 deadline for this annual report. As Dudek notes in its March 5, 2024 letter to Watermaster, future annual reports will be delivered to the PAC and TAC for review in January of each year, which should assure DWR that such an extension is a one-time request.
- 2. "Best-available science" requirement unmet.** SGMA directs DWR to evaluate and assess GSPs, and attendant annual reports, to determine that the contents are based on the best available science and technology. It appears that much of the monitoring data collected by Calleguas Municipal Water District from across the Las Posas Basin and provided to the FCGMA/Watermaster is missing from the datasets used to build the contour maps. The PAC recommends that Dudek review its dataset to ensure all pertinent data provided to the FCGMA/Watermaster is used.
- 3. Change in Storage analysis limited to Fox Canyon Aquifer.** SGMA requires that the GSP address every principal aquifer as well as the aquifer as a whole. It appears that the change in storage analysis is limited to the Fox Canyon Aquifer, omitting Grimes, Epworth, and Upper San Pedro in the east, and the shallow alluvial system in the west. As such, the analysis appears incomplete.
- 4. ASR Wellfield operations poorly characterized.** The annual report discusses operation of the ASR Wellfield during 2022-2023, but the discussion is limited to recitation of volumes of water injected and extracted and is missing important context. Calleguas Municipal Water District receives 100 percent of its supply from Metropolitan Water District. Calleguas is in a portion of the Metropolitan system that relies almost entirely on State Water Project (SWP) water. DWR limited SWP allocations to five percent in 2022—for the second year in a row.

This was an unprecedented restriction of access to SWP supplies, which led Metropolitan to impose severe demand management actions on Calleguas as part of its Emergency Water Conservation Program. Under these conditions, including a Drought Emergency declaration from the Governor, Calleguas produced approximately 4,000 acre feet of its pre-stored water in the Basin. Since that time, Calleguas has re-injected an equal amount of water, bringing total stored water to similar levels as before the drought emergency of 2022. Given that this document represents a public record of Basin conditions and activity, it is important that ASR Wellfield operations are correctly characterized in this emergency context. Calleguas would be happy to provide detail regarding the ASR Wellfield operations for Dudek to include in the annual report.

We appreciate the opportunity to review the GSP annual report—brief as the opportunity, by nature of the timeline, was. Should the FCGMA/Watermaster desire letters of recommendation or any other kind of support in petitioning DWR for this one-time extension, we would be happy to participate.

Thank you for your consideration,



Ian Prichard, Chair
LPV Basin Watermaster Policy Advisory Committee