

Las Posas Valley Groundwater Basin Technical Advisory Committee Regular Meeting

Tuesday October 15, 2024, 2:00 PM

Via Zoom:

<https://us02web.zoom.us/j/84168071218?pwd=Kv42H0XegH4TthbvJUgzTrzACgXM8b.1>

Webinar ID: 841 6807 1218

Passcode: 150451

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Las Posas Basin Technical Advisory Committee (TAC) will hold a regular meeting via Zoom at **2 PM on Tuesday October 15, 2024.**

AGENDA

- A. Call to Order
- B. Roll Call
- C. Agenda Review
- D. Public Comments
- E. TAC Member Comments
- F. Regular Agenda
 - 1. **Approve the Minutes of the October 2, 2024 TAC Special Meeting** (attached)
 - 2. **Recommendation Report– Revised Draft Scope of Work to Prepare the Las Posas Valley Basin 2025 Basin Optimization Yield Study**

The TAC reviewed the revised draft scope of work to prepare the Las Posas Valley Basin 2025 Basin Optimization Yield Study in the October 2, 2024 special meeting and authorized the TAC Administrator to prepare and send a Recommendation Report to the Watermaster. The Administrator prepared the Recommendation Report and submitted it to the Watermaster on October 4, 2024. The Recommendation Report is attached.

- 3. **Draft Recommendation Report – Draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation**

The TAC will discuss the draft Recommendation Report presenting TAC comments and recommendations for the draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation. The draft Recommendation Report for this consultation request includes comments and recommendations for the Watermaster and their consultant (Dudek) to consider while preparing the final version of the document and the amended GSP for the Las Posas Valley Basin.

The TAC will discuss the draft Recommendation Report and provide feedback to the TAC Administrator to facilitate finalization of the report and submittal to the Watermaster.

4. Watermaster Response Reports

The Watermaster has prepared Response Reports replying to TAC Recommendation Reports regarding BOP Tasks 1 and 2 and the Draft Scope of Work and Budget to Prepare the LPVB 2025 Basin Optimization Yield Study. These Response Reports are attached for TAC review and discussion.

5. Update on Committee Consultation Review Schedule

The TAC will receive an update on the schedule for upcoming committee consultations from the Watermaster Representative. Known current and upcoming consultation are summarized in the table below:

Consultation Description	Expected Request Date	Expected Review Due Date
Draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation	8/26/24	11/11/24; preferably earlier, 10/7 requested
Revised Basin Optimization Yield Study Scope and Budget	9/26/24	10/10/24
Draft Basin Optimization Plan	12/9/24	1/13/25
Revised / Amended Groundwater Sustainability Plan	January 2025	TBD
Calleguas ASR Project Operations Plan	TBD	TBD

6. Schedule for Completing Committee Consultations and Related Recommendation Reports

The TAC will discuss the schedule for completing the current reviews requested by the Watermaster and approaches for meeting the requested delivery dates.

G. Items for Future Agenda

Potential items for future agenda will be considered by the TAC

H. Adjourn

Attachment 1

Minutes of the October 2, 2024 TAC Special Meeting

Las Posas Valley Groundwater Basin Technical Advisory Committee Special Meeting

Meeting Minutes
for
October 2, 2024

A. Call to Order

Chad Taylor, Chair of the Technical Advisory Committee (TAC) called the meeting to order at 1:00 pm.

B. Roll Call

Voting TAC members present (via Zoom):

- Chair Chad Taylor - Present
- Vice Chair Tony Morgan - Present
- Bob Abrams - Absent

All non-voting TAC members were present (via Zoom):

- Bryan Bondy – Present
- Kimball “Kim” Loeb – Present

Chair Taylor reported that the TAC had a quorum with two of the three voting members present.

C. Agenda Review

Mr. Taylor asked TAC members for comments or requests to add items to the agenda published publicly prior to the meeting. TAC members offered no discussion of the agenda, and no additional items were identified.

Mr. Taylor provided an opportunity to the public to provide comments or requests for additional items on the agenda. No public attendees responded.

D. Public Comments

Chair Taylor opened the floor to public comments on items not on the agenda and none were received.

E. TAC Member Comments

Chad asked TAC members if they had comments on items not on the agenda for the meeting.

Mr. Bondy updated the TAC that the Calleguas Municipal Water District (CMWD) communicated with the Las Posas Valley Basin Watermaster legal counsel regarding the procedure for financial disclosure for non-voting TAC members. Watermaster Counsel's opinion of the Judgment is that financial reporting is not required for non-voting members. Mr. Taylor confirmed receipt of this information and noted future non-voting members will not be required to provide financial reports.

F. Regular Agenda

1. Approve the Minutes of the September 17, 2024 Regular Meeting

Chad asked the TAC members for discussion and/or comments on the draft minutes for the September 17, 2024 regular TAC meeting. No comments were received.

MOTION: Vice Chair Morgan moved to approve the minutes of the September 17, 2024 TAC Regular Meeting

SECOND: Chad Taylor

VOTE: Unanimously approved

2. Committee Consultation – Draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation

Chair Taylor opened discussion of the draft 5-Year GSP evaluation by reminding the TAC that all member comments were included in the agenda. He relayed to the TAC that there were common themes in the comments, including groundwater monitoring inconsistencies, differences in the numerical models for the two management areas, the dependence of sustainability in the West Las Posas Management Area (WLPMA) on conditions in the Oxnard Basin, responsiveness to California Department of Water Resources (DWR) recommended corrective actions (RCAs), etc. Mr. Taylor indicated that he did not intend to spend the meeting reviewing each TAC member's comments, but rather in a discussion of the recommendations to include in a Recommendation Report to the Watermaster.

Vice Chair Morgan expressed gratitude to the Watermaster and indicated that overall the draft 5-Year GSP Evaluation was a well written document. He indicated that his review identified areas of the text used inconsistent language to convey conclusions and adding cross references and reading for uniformity of data, information, and messaging would make the document clearer.

Mr. Bondy provided that the definition of sustainability in WLPMA in the context of Oxnard Basin seawater intrusion appears to require more work. He indicated that this should be highlighted as a TAC recommendation for the future as there is insufficient time to do more analysis before the document is finalized. However, this should be included in a workplan for future analysis. He noted that it is unclear if impacts from each of the three areas included in the United Water Conservation District (UWCD) groundwater model (WLPMA, Oxnard Basin, and Pleasant Valley Basin) on each other have been defined completely.

Mr. Taylor thanked the TAC members for their review and comments, noting that they were constructive and focused on improving the evaluation and the responses to DWR's RCAs to move the Las Posas Valley Basin forward toward sustainability. He asked TAC members if they noticed comments that were contradictory or appeared inconsistent? None were identified.

Mr. Taylor put forth a plan and schedule for preparing a Recommendation Report and providing feedback to the Watermaster. He indicated he will prepare a narrative summary of the major recommendations from TAC comments along with a tabular summary of all TAC comments and recommended edits to assist the Watermaster and their consultant (Dudek) in making and tracking revisions. Prior to completing the Recommendation Report Chad would also like to send the draft comments in the agenda to the Watermaster as a draft product to help them start editing the 5-Year GSP Evaluation. The other TAC members agreed with this approach.

Mr. Loeb indicated that he and the Watermaster appreciated the timely review of the 5-Year GSP Evaluation and recognized the short turnaround that was required. He also indicated that having comments in a tabular format for tracking edits would be helpful.

Mr. Bondy brought up future reviews, including the Basin Optimization Plan, which will also require significant TAC effort and recommended that the Watermaster engage the TAC proactively to help mitigate short turnaround reviews. Mr. Taylor indicated that this should be conveyed to the Watermaster.

Mr. Taylor asked for public comments on this item; none were provided.

3. Committee Consultation – Revised Draft Scope of Work to Prepare the Las Posas Valley Basin 2025 Basin Optimization Yield Study

Mr. Taylor asked the TAC to advance to discussion of the revised scope of work and budget to Prepare the Las Posas Valley Basin 2025 Basin Optimization Yield Study, noting that the revised documents were prepared in response to TAC comments and recommendations. Mr. Taylor reviewed each of the TAC recommendations on the original draft scope and budget individually along with the changes in the current scope. He did note that an evaluation of in lieu water as an alternative to pumping reductions was not included.

Mr. Loeb responded that Watermaster Staff addressed in lieu evaluation in a Response Report to the TAC recommendations, noting that reviewing additional in lieu and pumping scenarios would require significant additional assessment and feasibility analysis to define water transmission capacities and the Watermaster does not believe that is possible with the current schedule. The Watermaster would like to include this in future evaluations and hold the current effort to projects that were included in the GSP.

Chair Taylor expressed a hope that there will be an opportunity to evaluate in lieu feasibility in the future. Mr. Bondy agreed and indicated that in lieu water availability may be important for stability of the West Las Posas Management Area (WLPMA).

Mr. Bondy brought forward an additional comment on the revised scope. He indicated that he would like the TAC to be able to request data and information from model scenarios prepared by both United Water Conservation District (UWCD) and Dudek as they prepare and present model scenarios. If scope and budget for responding to TAC requests for tabular, graphical, and other data from model simulations was included that would provide the TAC with the ability to request and review data as needed.

The TAC members discussed what information they might want to review and how to describe the recommendation. The TAC agreed to recommend adding approximately 40 hours of as-needed time to the scope and budget for both Dudek and UWCD to compile and provide data and information resulting from model scenarios. Watermaster representatives attending the meeting noted that identifying specific data the TAC may want to review would make amending the scopes easier. TAC members indicated that it would not be possible to identify specific data and information before seeing the scenarios and resulting model simulations. TAC members also expressed indicated that as this work is being completed for the Watermaster it should be public information.

Chad noted a public question from Russ McGlothlin and invited him to speak. Mr. McGlothlin returned to Mr. Bondy's comments on in lieu water delivery evaluation and indicated that the Judgment says that rampdown should include uniform pumping reductions and that a project

including design and construction of infrastructure for in lieu water delivery was also included in the Judgement. Mr. McGlothlin expressed concern that the rampdown process will be like a meat cleaver instead of a scalpel when a scalpel is necessary.

Mr. Loeb responded that the in lieu project Mr. McGlothlin referenced would be evaluated, but would not include the multiple iterations of variable pumping reductions and in lieu deliveries previously discussed by the TAC.

No additional public comments were provided.

4. Update on Committee Consultation Review Schedule

Chair Taylor directed the TAC to agenda item 4 and discussion of the schedule for upcoming committee consultations. He noted that the agenda included a tabular summary of upcoming requests as discussed in the last TAC meeting and indicated that this is a good addition to the TAC meeting agendas that he will be working with Watermaster Staff to maintain.

Chair Taylor opened the floor to public comments and Russ McGlothlin asked about the schedule for review of the BOP, noting that it is not on the table in the agenda. He expressed interest in advanced planning for when the BOP will be presented to the TAC for review and when that review is expected to be complete.

Mr. Taylor responded that information about the anticipated date of the committee consultation request for the draft BOP and the subsequent expected due date for comments has not yet been submitted to the TAC. He indicated an expectation that the Watermaster and Dudek will work through the schedule for draft BOP preparation and inform the TAC as soon as they have anticipated delivery and comment due dates. He also informed Mr. Loeb, the Watermaster TAC representative, and the Watermaster Staff on the call that the TAC is interested in this schedule and would like to be notified as soon as possible.

Mr. Bondy noted that there were no TAC meetings scheduled before the due date for comments on the BOP scope and budget due date of October 10th and asked how the TAC planned to develop a Recommendation Report to meet that deadline.

Chad agreed and asked if the TAC was comfortable with him preparing and submitting a Recommendation Report conveying the limited comments to the Watermaster without draft review, or schedule a special meeting to review a draft.

Mr. Morgan agreed to allow Chad to prepare and submit this report.

MOTION: Vice Chair Tony Morgan moved to allow the TAC Administrator to submit a Recommendation Report with comments on the revised draft Scope of Work to Prepare the Los Posas Valley Basin 2025 Basin Optimization Yield Study.

SECOND: Chair Chad Taylor

VOTE: Unanimously approved

5. Schedule for Completing Committee Consultations and Related Recommendation Reports

Chad advanced to discussion of the schedule for completing TAC consultations and Recommendation Reports. He noted that the only consultation underway was the draft 5-Year GSP Evaluation for which a schedule was discussed in the previous agenda item. Chad reminded the other TAC members that the next regular TAC meeting is October 15th at 2 pm, for which a draft Recommendation Report should be available for review.

Mr. Bondy recommended scheduling meetings for December in anticipation of receiving a consultation request for Draft Basin Optimization Plan (BOP) on December 9th. Chad reminded the TAC that there are two regular meetings scheduled in December, one on the 3rd and one on the 17th.

The TAC members discussed the schedule for the Draft BOP and noted that they should anticipate reviewing comments and plan for a draft Recommendation Report ready by the regular meeting on January 7th. This would allow the TAC to meet the expected deadline of January 13th for comments to the Watermaster. This assumes that the Draft BOP is available on December 9th in time for distribution in the regular meeting agenda that must be published by December 13th for the meeting on December 17th. Mr. Taylor informed the group that if the consultation request is delayed the TAC may require special meetings.

There was no further discussion of this agenda item and no public comments were made.

G. Items for Future Agendas

Chair Taylor asked TAC members if for discussion of items for future agendas; no items for future agendas were raised by the TAC.

Mr. Taylor asked for public comments regarding items for future agendas and no comments were provided.

H. Adjourn

Chair Taylor made a motion to adjourn the meeting.

MOTION: Chair Chad Taylor moved to adjourn

SECOND: Vice Chair Tony Morgan

VOTE: Unanimously approved

Attachment 2

**Las Posas Valley Basin Technical Advisory Committee, TAC Consultation
Recommendation Report for Revised Draft Scope of Work to Prepare the Las
Posas Valley Basin 2025 Optimization Yield Study, October 4, 2024**

LAS POSAS VALLEY TECHNICAL ADVISORY COMMITTEE

October 4, 2024

RECOMMENDATION REPORT

To: Las Posas Valley Watermaster
From: Chad Taylor, LPV TAC Administrator and Chair
Re: TAC Consultation Recommendation Report for Revised Draft Scope of Work to Prepare the Las Posas Valley Basin 2025 Optimization Yield Study

The Las Posas Valley Basin Technical Advisory Committee (TAC) received a consultation request for review of the revised draft scope of work and budget for the Las Posas Valley Basin 2025 Basin Optimization Yield Study from the Las Posas Valley Basin Watermaster (Watermaster). The revised scope and budget were prepared in response to recommendations provided by the TAC in a Recommendation Report dated August 27, 2024, which addressed a prior draft of the scope and budget for the Las Posas Valley Basin (LPVB) 2025 Basin Optimization Yield Study.

The TAC met on October 2, 2024 and reviewed the revised draft scope and budget. The TAC recognized and appreciated that the Watermaster, their consultant (Dudek), and United Water Conservation District (UWCD) addressed nearly all of the TAC's recommendations on the previous draft scope of work and budget.

TAC RECOMMENDATIONS

TAC review of the revised scope and budget did identify one additional recommendation related to the combined Dudek and UWCD scopes and budgets for the 2025 Basin Optimization Yield Study. The TAC requests the Watermaster consider including scope and budget for both Dudek and UWCD to respond to requests for data and information generated during the basin yield model simulations to facilitate effective TAC review of model results. The TAC is not able to specify exact data or information that may be requested because they will depend on the model scenarios and simulations included in the basin optimization yield analyses. However, TAC members agreed that having access to graphical and tabular model input and output data showing water budget, groundwater flow, and groundwater head data may be required for full and efficient review of basin optimization yield analyses. The TAC recommends that 40 hours of time for preparing these data and information in response to TAC requests. This should be an as-needed and not to exceed amount and only that portion of the time actually required would be used.

Attachment 3

**Draft TAC Consultation Recommendation Report, Draft First Periodic Evaluation,
Groundwater Sustainability Plan for the Las Posas Valley Basin, October 10, 2024**

LAS POSAS VALLEY TECHNICAL ADVISORY COMMITTEE

October 10, 2024

DRAFT RECOMMENDATION REPORT

To: Las Posas Valley Watermaster
From: Chad Taylor, LPV TAC Administrator and Chair
Re: TAC Consultation Recommendation Report, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin

The Las Posas Valley Basin Watermaster (Watermaster) requested a consultation from the Las Posas Valley Basin Technical Advisory Committee (TAC) for the Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin (Draft GSP Evaluation). The TAC appreciates the effort the Watermaster, and their consultant (Dudek), committed to the Draft GSP Evaluation. Overall, the Draft GSP Evaluation is a well written document that appears to conform to the guidance provided by DWR. It is clear that the authors dedicated significant effort to provide a well-organized report evaluating and documenting groundwater conditions, planning, and management since the end of the period in the GSP. The TAC has reviewed the Draft GSP Evaluation and is providing this Recommendation Report to convey comments and recommendations to the Watermaster for consideration in revising the Draft GSP Evaluation prior to submittal to the California Department of Water Resources (DWR). The TAC also hopes these comments and recommendations will inform future groundwater sustainability planning for the Las Posas Valley Basin (LPVB).

This Recommendation Report presents major comments and recommendations on the Draft GSP Evaluation in a narrative format. These major comments are illustrated in the attached table providing detailed technical and editorial comments from each TAC member referencing specific sections of the Draft GSP Evaluation. These detailed comments were also provided to the Watermaster on October 4, 2024 to facilitate rapid review and integration into the final GSP Evaluation.

TAC COMMENTS AND RECOMMENDATIONS

Comment / Recommendation 1: Inconsistent Groundwater Monitoring

TAC members all noted and commented on the inconsistency of groundwater elevation and water quality monitoring in the LPVB. Specifically, expected and necessary groundwater elevation and water quality measurement events have been routinely missed since adoption of the GSP. It is critical that these basic data be collected frequently and consistently as

without them it is not possible to evaluate conditions in the Basin relative to sustainable management criteria with certainty. The TAC recognizes that the Watermaster relies on partner agencies for groundwater monitoring in many cases and cannot control the data collection programs of those agencies. However, the inconsistent data collection that has occurred as a result of this approach thus far presents a problem that is too large for the Watermaster not to address as quickly and effectively as possible. The TAC is concerned that important interpretations and statements regarding groundwater sustainability presented in the Draft GSP Evaluation are based on limited data (in some cases as little as one or two data points). These interpretations include evaluations of basin-wide, aquifer specific, and management area groundwater conditions, comparisons to minimum thresholds for groundwater sustainability, and conclusions regarding the effectiveness of groundwater management in the LPVB. The TAC questions whether the interpretations can be relied upon given that they are based on such limited and inconsistent data.

To address this inconsistent groundwater monitoring problem the TAC recommends the following:

1. Appropriately caveat interpretations, comparisons, and conclusions that rely on limited and inconsistently collected data (see detailed comments in the attached table for references to specific text passages).
2. Either establish agreements with partner agencies to consistently, correctly, and routinely collect the groundwater elevation and water quality data required to adequately assess groundwater conditions and progress towards sustainability or begin perform these monitoring responsibilities using Watermaster staff.
3. Fast track the projects in the GSP and Draft GSP Evaluation that include construction of monitoring wells and instrumentation of those and other monitoring wells with transducers (Projects 7 and 8, respectively). The Draft GSP Evaluation alluded to delays in implementation of these projects occurred because the Watermaster did not receive requested grant funds. The TAC recommends identifying alternative funding sources for this critical component of successful sustainable groundwater management. If alternative funding sources cannot be secured, consider requesting Technical Support Services (TSS) from DWR. The DWR TSS program was designed to provide field activity support, including monitoring well installation, groundwater level monitoring training, and other relevant assistance.
4. Expand the existing monitoring network by including private wells when and where necessary. While private, active, pumping wells are not perfect for groundwater elevation and water quality monitoring, they are a reasonable means of expanding monitoring networks into areas where dedicated monitoring wells don't exist and providing redundancy for existing monitored wells.

Comment / Recommendation 2: Boundary Condition Differences in West and East Management Area Models

The Draft GSP Evaluation indicates that the model used to simulate conditions in the West Las Posas Management Area (WLPMA), the Coastal Plain Model, developed, maintained, and employed by United Water Conservation District (UWCD) was recently modified. The

extent and nature of these modifications was not described in detail in the Draft GSP Evaluation, but TAC review did note that a potentially significant change was made to the boundary condition used to represent the Somis Fault, which separates the WLPMA from the East Las Posas Management Area (ELPMA). This component of the Coastal Plain Model that is important to the representation of groundwater flow in the LPVB was changed from a no-flow boundary condition to a partial general head boundary condition. This change means the Coastal Plain Model used for the Draft GSP Evaluation allowed flow from the WLPMA to the ELPMA.

The Draft GSP Evaluation indicates that the limited groundwater elevation information in this area of the LPVB implies limited groundwater flow across the Somis Fault and that gradients suggest that if flow occurs it is from ELPMA to WLPMA. Unfortunately, further exploration of the effects of the change to the Coastal Plain Model are not included in the document.

The ELPMA model used to simulate conditions in the ELPMA maintains a no-flow boundary along the Somis Fault, which the TAC assumes results in potentially significant differences in simulated groundwater flow across the WLPMA/ELPMA boundary in the two models. However, the differences between the flow conditions and water budgets in the two models is not described in the Draft GSP Evaluation. The TAC is concerned that the difference in the representation of this boundary between the two LPVB management areas signifies a problematic discrepancy in simulated groundwater flow and budgets within the LPVB.

The Draft GSP Evaluation does indicate that the Watermaster plans to coordinate with UWCD and the TAC to better align the representation of this boundary condition in advance of the Basin Optimization Yield Study. However, the Draft GSP Evaluation relies on simulations using these two models to assess the adequacy of the GSP to meet the sustainability goal of the LPVB, including the effect of projects and management actions and estimating historical changes in groundwater storage, effects of reductions in groundwater production, and sustainable yield for each management area.

The TAC also notes that the Draft GSP Evaluation includes references to multiple documents that include additional information regarding the changes to the Coastal Plain Model. However, these references are either not yet available for review or the information included in them is not included in the Draft GSP Evaluation.

The TAC recommends the following regarding this model discrepancy:

1. Add detailed information relating to the changes to the Coastal Plain Model. This should include maps showing the area of changed Somis Fault boundary conditions, volumes of flow between the two management areas, comparison to the version of the model used in the original GSP, etc. This additional detail should be aimed at providing information to alleviate concerns regarding the apparent inconsistency between the two models.
2. Include relevant information on the changes to the Coastal Plain Model in the Draft GSP Evaluation, not simply as references to other documents. Stakeholders and

interested parties should not have to read reports for other basins to access information related to important components of the LPVB GSP Evaluation.

3. Assess and document the differences in simulated flow and water budgets across the Somis Fault between the two models and include this information in the GSP Evaluation.
4. Advance the coordination with UWCD and the TAC to develop agreement on the representation of this boundary in the two models. The coordination of this boundary between the two models should not wait until after the GSP is amended. The analyses in the amended GSP should be consistent with the Basin Optimization Yield Study.

Comment / Recommendation 3: Relationship Between Oxnard Subbasin and Sustainability in the WLPMA

The TAC is concerned that the methods used to date to assess the effects of pumping in the WLPMA on seawater intrusion conditions in the Oxnard Subbasin lack scientific rigor. The Draft GSP Evaluation presented model scenarios that included simultaneous changes in pumping volumes in the WLPMA, both Oxnard aquifers, and the Pleasant Valley Basin. The results of these simulations were then compared to a baseline scenario and the changes to simulated seawater intrusion in the Oxnard Subbasin were used to evaluate effects on sustainable yield in the WLPMA. However, the changes to pumping volumes in the scenarios appeared to be relatively arbitrary and the TAC is concerned that the resulting sustainable yield estimates for the WLPMA are similarly arbitrary.

The TAC recommends developing model scenarios that limit changes to single variables to assess the impacts of those variables on sustainability. This could include scenarios wherein pumping in the Oxnard Subbasin and Pleasant Valley Subbasin are held constant while pumping in WLPMA is varied. Comparison of the results of such simulations could then be compared to the baseline to evaluate changes in seawater intrusion in the Oxnard Subbasin, thereby developing a relationship between pumping volume in WLPMA and seawater intrusion. Similar scenarios with reductions in pumping in only the Oxnard Subbasin and only the Pleasant Valley Basin could also be conducted to isolate the effects of changes in pumping in those basins on seawater intrusion. Estimates of the effects of pumping reductions in each individual basin could then be used to more precisely identify the sustainable yield in each basin.

Comment / Recommendation 4: Respond Completely to all Elements of the DWR Recommended Corrective Actions

The DWR recommended corrective actions (RCAs) all include multiple requests for additional information, and the responses did not always provide all the requested information. For instance, the RCA 2 requests discussion of the potential effects of the minimum thresholds and measurable objectives on beneficial uses and users of groundwater. However, the sections of the Draft GSP Evaluation intended to respond to this RCA may not adequately respond to this request. The discussion that is included is somewhat vague about the beneficial uses and users and includes errors, as detailed in the

specific comments in the attached table. This is true for other RCA responses as well, as documented in the attached table.

The TAC recommends carefully reviewing the entirety of each RCA and identifying each component of DWR's request and including responses. The TAC believes that it is better to acknowledge each element of the RCA, even if there is insufficient information to completely address the request. In such cases it would be appropriate to indicate how the Watermaster plans to address the RCA in the future.

Comment / Recommendation 5: Check Entire Document for Consistency of Language and Content

The TAC noted variability in the Draft GSP Evaluation relating to use of language when presenting important conclusions and between tables and text. The TAC review specifically noted sections of text that presented the same information but used different language that was sometimes less certain and/or impactful. Instances of passive and uncertain terminology in important conclusions were also observed.

The TAC recommends the authors review the detailed comments in the attached table and perform a thorough review of the document to maintain consistent content and impact throughout.

Attachment 1

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee, Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-TC-1	Bryan Bondy	General Technical	Interpretations Made Based on Limited Data	--	--	--	Interpretations presented in the document that are based on limited data (in some cases as little as one or two data points), should be appropriately caveated and, as discussed in other comments, steps should be taken to better coordinate with monitoring partners to reduce the frequency of missing data.
BB-TC-2	Bryan Bondy	General Technical	Missing Monitoring Data	--	--	--	There are a notable number of unavailable groundwater level and quality measurements during period since GSP adoption. It is critical that data be collected to evaluate status relative to the sustainable management criteria and more generally understand groundwater conditions. It is noted that FCGMA does not collect data itself and, instead, relies on other entities monitoring programs for data. To date, it does not appear that FCGMA has formalized arrangements with the monitoring entities. It is recommended that FCGMA coordinate with the monitoring entities communicate FCGMA's data needs and formalize agreements. In cases where the monitoring entities cannot commit to providing certain data or if monitoring locations are no longer available or accessible, FCGMA should take steps to address those gaps.
BB-TC-3a	Bryan Bondy	Technical	--	ES-2	3rd paragraph	<i>In the western part of the WLPMA groundwater elevations in the FCA were higher in water year 2024 than they were in water year 2015.</i>	Based on Figure 2-4, there does not appear to be any 2024 groundwater level measurements in the western half of the WLPMA. Therefore, it is unclear what data the quoted sentence is based upon.
BB-TC-3b	Bryan Bondy	Technical	--	ES-2	3rd paragraph	<i>In contrast, groundwater elevations in the eastern part of the WLPMA were lower in water year 2024 than they were in water year 2015.</i>	Based on Figure 2-4, there is one well indicating a higher groundwater level in 2024 and one indicating a lower groundwater level in the eastern half of the WLPMA. Therefore, it is unclear what data this statement is based upon.
BB-TC-3c	Bryan Bondy	Technical	--	ES-2	3rd paragraph		Consider instead distinguishing between changes in the pumping depression in the southeastern corner of the WLPMA versus the remainder of the management area, with groundwater levels appearing to be lower in former and higher in the latter.
BB-TC-4	Bryan Bondy	Technical	Representative Monitoring Points		Figure 2-2 Table 2-2	--	Consideration should be given to enhancing the RMP network (per review of Figure 2-2): <ul style="list-style-type: none"> • Western WLPMA – there is no RMP for the Fox Canyon Aquifer • WLPMA and ELPMA – both areas lack GCA RMPs (potential candidate RPM well is 03N19W30E07-D) • Epworth Gravels – only one RPM (potential candidate for additional RMPs include 03N19W30M02 and 03N19W30E07-S)
BB-TC-5	Bryan Bondy	Technical	Zone Mutual Water Company Infrastructure Improvement Project		Table 1-1, 4th row; Section 3.2.1; Section 5.2.2.1.5	--	While Zone Mutual Water Company (Zone) is moving forward with the infrastructure improvements described in the evaluation report, Zone has indicated there are potential legal issues that may prohibit or limit Zone's ability to wheel water to non-shareholders. These issues need to be studied along with other opportunities for moving water between WLPMA and ELPMA. Regarding the 500 AFY of water savings associated with converting from scheduled deliveries to on-demand deliveries, this benefit should not be included in the future water supplies for the Projects Scenario because that water savings will be retained as carryover or leased to other water right holders for the benefit of Zone shareholders unless Watermaster creates a financial mechanism to make Zone whole.
BB-TC-6	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	<i>The depth and groundwater production rates from the wells in this area indicate that they are agricultural wells...</i>	This statement is incorrect. 10 of the 22 wells are Calleguas ASR wells.
BB-TC-7	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	The reviewer checked the top perforation elevation of 13 of the 22 wells in Table 2-1 for which data was readily available and found 12/13 to be incorrect, with errors averaging 48 feet ranging from 10 to 364 feet. Using the correct elevations for the twelve wells reviewed would add three wells to the number of wells with a projected groundwater elevation below the top of the screen. Based on these findings, a full QC of this table is warranted.

**Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin**

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-TC-8	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	The analysis implies that significant effects will not manifest until the static groundwater level drops below the top of the screen in a well. The analysis also implicitly assumes that pumping can be sustained with pump placements in the screen interval. These assumptions are inconsistent with the generally accepted well design principle of pump placement above the top of screen to avoid pump bowl or screen abrasion, sand production, cascading water, and accelerated fouling (Glottfelty, 2019 - Art of Water Wells). Wells with partially desaturated screens commonly experience increased fouling rates (sometimes very rapid), which causes significant loss of production, premature well rehabilitation, and premature well replacement. Text should be added to explain why these effects are not considered in the analysis.
BB-TC-9	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	Given that 10 of the 22 wells identified in Table 2-1 are Calleguas ASR wells, the analysis should address potential effects on storage and recovery operations of the Calleguas ASR well fields.
BB-TC-10	Bryan Bondy	Technical	GDEs	34	Section 2.7.2	<i>The areas where satellite imagery indicates declining plant cover may be related to shifting flow patterns within the arroyo, with decreasing greenness on the banks of the arroyo and decreasing greenness in the downstream portion of the arroyo, adjacent to the PVB.</i>	Another potential explanation for decrease greenness could be vegetation removal during high flow events during the 2023 and 2023 wet seasons. Air photos could be reviewed to assess this.
BB-TC-11	Bryan Bondy	Technical	Arroyo Simi-Las Posas Water Acquisition Project	40	Section 3.1.2.3.2 and Table 3-1	<i>Text states the project "will make additional water available to recharge" and table states the project benefit will be "increase in sustainable yield."</i>	These statements are incorrect. The project would ensure that existing inflows continue, which maintains status quo, as opposed to adding water to the ELPMA water balance.
BB-TC-12	Bryan Bondy	Technical	--	43	Section 3.2.2	<i>Text states the project would "reduce the dependence on imported water in the LPVB by providing new local potable supplies" and later states the project will "reduce groundwater demands in the LPVB."</i>	These statements appear to be in conflict. Please provide information about anticipated reductions in groundwater demand vs. reduction in imported water purchases. In other words, what is the anticipated net benefit to the ELPMA water balance?
BB-TC-13	Bryan Bondy	Technical	New Data for ELPMA	51	Section 4.1.1.1	<i>No new information is available that would improve or update the understanding of the hydrogeologic conceptual model of the ELPMA and Epworth Gravels Management Area.</i>	Calleguas has constructed three multi-level groundwater monitoring wells, which provides new stratigraphic data for the hydrostratigraphic model. In particular, 03N19W30E07 is a nested monitoring well that provides data to better characterize the Epworth, FCA, and GCA in northern ELPMA and 02N20W11B01-3 is a clustered monitoring well that provides data better characterize the Upper San Pedro Formation and FCA south of the Moorpark Anticline in the ELPMA. In addition, groundwater level data collected from these wells can be used to characterize vertical gradients. These data should be incorporated into the Hydrogeologic Conceptual Model.
BB-TC-14	Bryan Bondy	Technical	Data Gaps in the HCM	52	Section 4.2; Table 4-1	--	Text states that no additional information has been collected to address data gaps. Please see prior comment. New data from Calleguas' multi-level groundwater monitoring wells helps address the data gaps listed in Table 4-1.
BB-TC-15	Bryan Bondy	Technical	WLPMA Model Update		Section 5.1.1, Table 2-4b	--	Review of the modeling for the WLPMA cannot not be completed at this time because documentation of the Coastal Plan model is not yet available. Based on review of the GSP evaluation, there are several issues with the Coastal Plain model that appear worthy of further review in consultation with the TAC. Additional items worthy of further review may be identified after documentation review. The issues identified based on the GSP evaluation review include (1) conversion of the WLPMA-ELPMA model boundary from no-flow to general head, (2) inconsistency between the model LAS water balance (Table 2-4b), which indicates little to no underflow from the Oxnard Subbasin into WLPMA in contrast with spring groundwater elevation contours in the annual reports that suggest there is underflow from the Oxnard Subbasin into WLPMA; (3) groundwater exchange between Pleasant Valley Basin and WLPMA; and (4) groundwater exchange between ELPMA and WLPMA.

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BB-TC-16	Bryan Bondy	Technical	WLPMA Modeling and Sustainable Yield Estimate for WLPMA		Section 5.2.2.1 and Section 5.2.3.1	--	While assessment of impacts on adjacent basins is clearly required under SGMA, the framing and analysis of WLPMA impact on Oxnard Basin and the approach to estimating WLPMA sustainable yield seem problematic for multiple reasons. First the analysis has not isolated the impact of WLPMA pumping on seawater intrusion for technical evaluation and consideration in policy making. Second, the analysis of the interaction between WLPMA and the Oxnard Subbasin appears to ignore the fact that numerous WLPMA groundwater pumpers pay pump fees to UWCD. This is evident in the discussion of the underflows from Oxnard Subbasin into WLPMA, which are characterized as a “losses of underflow recharge” to the Oxnard Subbasin. The implication is that WLPMA is taking water away from the Oxnard Subbasin, when, in fact, many pumpers have paid for the benefit of underflow from UCWD’s recharge operations. Consideration should be given to reframing analysis of WLPMA impacts on seawater intrusion and WLPMA sustainable yield to account for underflow that is paid for by WLPMA extraction fees paid to UWCD and additional analysis that isolates the actual influence of WLPMA pumping on seawater intrusion.
BB-TC-17	Bryan Bondy	Technical	Future Baseline with EBB Results	85	Section 5.2.2.1.6	--	Regarding the Future Baseline with EBB scenario, the text states “These results indicate that groundwater production at the average 2016 to 2022 rates in the Oxnard Subbasin, PVB, and WLPMA may be sustainable if UWCD’s EBB project is implemented at a 10,000 AFY production scale.” It is unclear how this scenario can be considered sustainable for the WLPMA because Figures 5-23a and b show minimum threshold exceedances for this scenario.
BB-TC-18	Bryan Bondy	Technical	ELPMA Future Baseline Scenario		Section 5.2.2.2.1	--	Please incorporate the table produced for TAC titled “Summary of Annual Discharges Simulated in the East Las Posas Model (2040-2069 Average)” into the evaluation report in this section as it provides important context for technical evaluation of the scenarios.
BB-TC-19	Bryan Bondy	Technical	--	91	Section 5.2.3.2	--	Average ELPMA pumping 2021-2022 value of 23,800 incorrectly includes Epworth Gravels pumping and should be reduced to 23,400 (see Table 4-4). After making that correction, the amount of extraction in excess of the upper estimate of sustainable yield becomes 1,900 AFY and should be updated.
BB-TC-20	Bryan Bondy	Technical	--	92	Section 5.2.3.3	--	The 2021-2022 average annual extractions from the Epworth Gravels is incorrectly reported as approximately 900 AFY and being approximately 450 AFY lower than the estimated upper end of the sustainable yield. Per Table 4-4, the 2021-2022 average annual extractions should be approximately 460 AFY, which is approximately 890 AFY lower than the estimated upper end of the sustainable yield.
BB-TC-21	Bryan Bondy	Technical	Monitoring Network		Section 6	--	Consideration should be given to incorporating the three multi-level monitoring wells constructed by Calleguas in the ELPMA into the monitoring network. These monitoring well nests/clusters provide valuable aquifer specific data, including much needed data for the Grimes Canyon Aquifer at one location. Data from these wells are already provided to FCGMA by Calleguas MWD on a regular basis.

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BB-TC-22	Bryan Bondy	Technical	Revisions to CMWD Monitoring Network	95	Section 6.1; Table 6-2	<i>Four of the wells have been removed from the monitoring network because they were either destroyed or CMWD had recurring access issues.</i>	<p>Calleguas has not had access issues.</p> <p>The following are clarifications concerning the wells listed in Table 6-2:</p> <ul style="list-style-type: none"> Well 03N20W32H02S has been dry for numerous years. Calleguas continues to check the well for water and will reinstall a transducer if water returns. Consider retaining in monitoring network pending increasing groundwater levels. Well 02N20W02D02S was destroyed by the owner. Well 03N20W36P01S has a transducer stuck in the sounding tube. The transducer will be reinstalled the next time the well pump is removed. Well 03N20W35J01S is continuing to be monitored with a transducer. However, the groundwater levels are considered anomalous. It is recommended that this well be removed from the monitoring network due to anomalous data. Well 02N20W01B02 is noted as being added to the monitoring network in Table 6-2. This is not correct. This well was already included in the monitoring network in the GSP. Table 6-2 says no water quality sampling. This is not correct. Water quality samples are collected according to satisfy Division of Drinking Water requirements and are available from Calleguas or from the SWRCB website. <p>Calleguas has added its three multilevel groundwater monitoring wells to its monitoring network.</p>
BB-TC-23	Bryan Bondy	Technical	Change in CMWD Monitoring Schedule	96	Table 6-3	--	<p>Table 6-3 indicates that several wells are “no longer monitored” for water quality. It is noted that Calleguas has never sampled these wells (except once for monitoring wells immediately following construction). FCGMA incorrectly assumed that Calleguas was sampling these wells.</p> <p>Well 02N19W06F01S is an agricultural well, not a monitoring well.</p> <p>Well 02N20W09Q08S is a monitoring well, not a municipal well.</p>
BB-TC-24	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	<i>Currently, groundwater elevation measurements are not scheduled according to these criteria because FCGMA relies on monitoring by several other agencies. To minimize the effects of this type of temporal data gap in the future, it would be necessary to coordinate the collection of groundwater elevation data, so it occurs within a 2-week window during the key reporting periods of mid-March and mid-October. The recommended collection windows are October 9–22 in the fall and March 9–22 in the spring.</i>	<p>Calleguas and VCWWD have transducers installed in all the wells in their monitoring network. The only reason data may be missing for these wells during the fall and spring two-week windows is if a transducer has failed and is pending reinstallation. FCGMA is encouraged to coordinate with Calleguas and VCWWD to facilitate determine an approach for collection of manual groundwater level measurements to address the fall and spring window data needs.</p>
BB-TC-25	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	<i>Additionally, as funding becomes available, pressure transducers should be added to wells in the groundwater monitoring network.</i>	<p>It is noted that Calleguas and VCWWD already have transducers installed in all the wells in their monitoring network.</p>
BB-TC-26	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	<i>Since adoption of the GSP, 13 wells that were to be monitored for groundwater quality are no longer monitored for groundwater quality. The majority these wells, 11 of the 13 wells, are representative monitoring wells located in the ELPMA requirements.</i>	<p>As noted in comment BB-TC-23, Calleguas never committed to sample the wells in its monitoring network, other than ASR wells, which are sampled to comply with Division of Drinking Water requirements.</p>
BB-TC-27	Bryan Bondy	Technical	Data Gaps	97	Section 6.2	--	<p>Consideration should be given to reevaluating data gaps in consultation with TAC after FCGMA staff have met and conferred with the monitoring entities.</p>
BB-TC-28a	Bryan Bondy	General Technical	Potential Additional Report Elements	--	--	--	<p>1. Consideration should be given to including groundwater level contour maps. Perhaps the annual report figures could be compiled into an appendix.</p>

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BB-TC-28b	Bryan Bondy	General Technical	Potential Additional Report Elements	--	--	--	2. Consideration should be given to including discussion concerning whether there were any notable changes in the spatial distribution of pumping in the management areas.
BB-EC-1	Bryan Bondy	General Editorial	Figure References	--	--	--	The reviewer noticed a number of incorrect figure and table number references in the text. Consider QC'ing.
BB-EC-2	Bryan Bondy	Editorial	--	120	Figure 2-2	--	Wells 18H12 and 17L01 (WLPMA) and 01Q02 (ELPMA) are depicted as RMP/Key Wells but are not identified as such in the GSP and are not listed in Table 2-2.
BB-EC-3	Bryan Bondy	Editorial	--	120	Figure 2-2	--	RMP/Key Well 35R02 is missing on Figure 2-2.
BB-EC-4	Bryan Bondy	Editorial	--	ES-3	2nd full paragraph	...14 key wells in the ELPMA...	per Table 2-2 and the GSP, there are 15 (13 FCA and 2 Shallow Aquifer).
BB-EC-5	Bryan Bondy	Editorial	--	122 and 124	Figures 2-3 and 2-4	--	These figures are a clever approach to communicating status relative to the SMCs. However, while the graphics in the lower half of the figures are intuitive, they are misleading because the scale for each well is different. This is most evident in the fact that the distance between the MO and MT lines are same for each well when the actual distance between MO and MT ranges from 20 to 100 feet. Additionally, wells appear closer or further from their respective MO / MT relative to other wells than they actually are. For example, the Spring 2024 groundwater levels for 26R03 and 01B02 on Figure 2-4 visually appear to be very different heights above their respective MOs but are actually about the same (24 and 23 feet, respectively). At a minimum, the bottom graphics should be noted as being not to scale and that the graphics for the various wells are not comparable. Preferable, the graphics would be adjusted to that all wells are at the same scale and the actual distances between MO and MT for each well are depicted.
BB-EC-6	Bryan Bondy	Editorial	--	ES-4	1st paragraph	--	The values in this paragraph are incorrect: <ul style="list-style-type: none"> • Average WLPMA pumping 2021-2022 was 4,000 AFY more than the upper estimate of sustainable yield, not 3,100 AFY (see value reported on p. 90). • Average ELPMA pumping 2021-2022 was 1,900 AFY more than the upper estimate of sustainable yield, not 2,300 AFY (note: although 2,300 is reported on p. 91, the pumping used for the calculation incorrectly includes Epworth Gravels pumping).
BB-EC-7	Bryan Bondy	Editorial	--	1	Table 1-1, 2nd row	--	Consider also mentioning Simi Valley dewatering wells here, i.e., the City of Simi Valley is no longer planning to divert dewatering well discharges to a desalter for potable use.
BB-EC-8	Bryan Bondy	Editorial	--	6	Section 2.2 second paragraph	--	Per Figure 2-4, groundwater elevations were measured in 16 of the 21 key wells, not 15 as indicated in the text.
BB-EC-9	Bryan Bondy	Editorial	--	24	Table 2-5	--	WLPMA – LAS estimated 2016-2024 change in storage value is incorrect. S/B -32,970
BB-EC-10	Bryan Bondy	Editorial	--	52	Section 4.1.3.1	--	It is unclear what new information has been incorporated into understanding of recharge areas.
BB-EC-11	Bryan Bondy	Editorial	--	55	Section 4.3.2.1	--	Text states “Available data characterizing groundwater extractions in water years 2021 and 2022 indicate that groundwater extractions from the LPVB averaged approximately 42,400 AFY (Tables 4-3 and 4-4).” Per the referenced tables, the value cited in the text should be 40,400 AFY.
BB-EC-12	Bryan Bondy	Editorial	--	Table 4-4		--	WY 2022 Epworth Gravels Aquifer extraction value appears anomalously low. Consider investigating and/or footnoting.
BB-EC-13	Bryan Bondy	Editorial	--	Table 4-4		--	Please footnote table to clarify whether values include Calleguas MWD extractions.
BB-EC-14	Bryan Bondy	Editorial	--	68-69		--	Something is wrong with the transition from p. 68 to p. 69.
BB-EC-15	Bryan Bondy	Editorial	--	86	Section 5.2.2.2.1	--	Second bullet – the wrong model is referenced.
BB-EC-16	Bryan Bondy	Editorial	--	Table 6-1		--	Explanation for footnote “a” is missing.
BB-EC-17	Bryan Bondy	Editorial	--	98		--	“CGMA” s/b “FCGMA”

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BA-1	Bob Abrams	General Technical	Groundwater Monitoring	--	--	--	Overall, monitoring in the LPVB could be improved. Many key wells have not been monitored and no reasons for this are provided. For example, key well 02N20W06R01S, which has been below the water-level minimum threshold, was not monitored in 2024. The lack of monitoring seems particularly true in the West Las Posas Management Area (WLPMA), where there are five key wells but only two or three are ever monitored. The lack of explanation could be interpreted to mean that the Fox Canyon Groundwater Management Agency (FCGMA) is trying to downplay this issue.
BA-2	Bob Abrams	General Technical	Projects and Management Actions	--	--	--	In terms of projects benefitting the LPVB, the evaluation appears to indicate that action is being delayed because of the Judgment and Basin Optimization Plan. For example, it appears that FCGMA has spent most their time on the Oxnard Basin model, work that was done by United Water Conservation District (UWCD). This seems to be the only substantive management action that has moved forward in LPVB.
BA-3	Bob Abrams	General Technical	Grimes Canyon Aquifer	--	--	--	The Grimes Canyon Aquifer (GCA) seems to be mentioned then ignored. In WLPMA, where data are particularly sparse, it just gets lumped into the Lower Aquifer System (LAS).
BA-4	Bob Abrams	General Technical	Recharge Figures	--	--	--	Figure 4-1 that shows recharge areas for Fox Canyon Aquifer (FCA). Why no equivalent figure for the GCA recharge area?
BA-5	Bob Abrams	General Technical	Water Quality	--	--	--	There are indications of deteriorating groundwater quality in localized areas. The Evaluations states that this is not related to pumping, but no explanation is given for why for the local concentration increases. Is water from the Upper San Pedro possibly being pulled down by pumping?
BA-6	Bob Abrams	General Technical	Groundwater Monitoring	--	--	--	FCGMA appears to source most or all of the necessary monitoring data from other agencies. Thus, there is no apparent direct culpability if data are not collected.
BA-7	Bob Abrams	General Technical	Groundwater Modeling	--	--	--	A large amount of new modeling work for the Oxnard Basin is presented. This work is only slightly relevant to the WLPMA of LPVB, but much attention is devoted to describing this work in the Evaluation. The many particle tracking figures presented do not appear to be relevant to the Evaluation.
BA-8	Bob Abrams	Editorial	--	ES-1	Footnote 1	--	Not sure what this is referring to?
BA-9	Bob Abrams	Editorial	--	ES-1	Footnote 2	<i>Under the Judgment adopted in the LPVB adjudication (Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700) water year 2024 begins on October 1, 2024 and will end on September 30, 2025.</i>	Need to explain how this apparent mismatch will be managed in the document and in future. Water Year and Court Water Year (when required)?
BA-10	Bob Abrams	Editorial	--	ES-2	--	<i>Because the Judgment is still being implemented and subject to appellate court review, its effect on FCGMA's implementation of the LPVB GSP and sustainable management of the LPVB is uncertain.</i>	Not clear what this sentence achieves? Suggest re-wording or deleting.
BA-11	Bob Abrams	Technical	--	ES-2	--	--	Groundwater elevations in the GCA in WLPMA are not mentioned? This is inconsistent, as it is mentioned for ELPMA Need to mention that there are few wells in the GCA in WLPMA and this is an area of uncertainty? Or is it the intention to call the FCA/GCA the LAS in WLPMA as per Table 2.2 and brush over the lack of aquifer specific wells?
BA-12	Bob Abrams	Editorial	--	ES-2	--	<i>Groundwater elevations central ELPMA near the CMWD ASR well field</i>	Suggested addition in red text: Groundwater elevations in central ELPMA near the CMWD ASR well field

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BA-13	Bob Abrams	Editorial	--	ES-4	--	<i>groundwater levels in the WLPMA should be maintained at elevations that are high enough to not inhibit the ability of the Oxnard Subbasin to prevent net landward migration of the saline water impact front</i>	Can this be re-written? This is expressed more clearly on page 17 as "...groundwater levels, significant and unreasonable loss of groundwater in storage, and, in the WLPMA, will not prevent the Oxnard Subbasin from achieving its sustainability goal"
BA-14	Bob Abrams	Editorial and Technical	--	ES-4	--	<i>The largest administrative uncertainty is related to how the LPVB Judgment will impact FCGMA's ability to implement the GSP and sustainably manage the LPVB,</i>	This is a subjective comment and could be deleted. Or the red text could be added. Suggest this document should focus on technical uncertainties rather than administrative. "The largest administrative uncertainty is related to how the LPVB Judgment will impact FCGMA's ability to implement the GSP and sustainably manage the LPVB,"
BA-15	Bob Abrams	Technical	--	10	--	<i>Groundwater elevation was not measured in well 02N20W12MMW1 in water year 2024</i>	Is it worth noting the reason why the elevation was not measured in this key well? Leaving it as unexplained reduces the robustness of data reporting.
BA-16	Bob Abrams	Technical	--	11	Table 2.2		The Table would be stronger if there was a column or note explaining why key wells were not measured, otherwise it looks like poor groundwater management – there are lots of ‘-’ cells indicating data not collected, which is obviously disappointing.
BA-17	Bob Abrams	Editorial	--	13	FCA third paragraph	<i>Fall groundwater elevations decreased from by less than a foot to 48 feet</i>	To avoid confusion - the 'from' in the sentence could be read as ft msl, when the intention is to show the change in elevations. Previous paras and next sentence are clearer.
BA-18	Bob Abrams	Technical	--	13	GCA	<i>Sufficient measurements were not collected by the monitoring agency to evaluate the change in groundwater elevation for fall 2015 to fall 2023 and spring 2015 to spring 2024.</i>	Explain the reasons and note that it remains an area of uncertainty? Otherwise, it looks like it is being glossed over.
BA-19	Bob Abrams	Editorial	--	15	--	<i>Fall 2023 groundwater elevations were below the 2025 interim milestones in the two of the key wells in the WLPMA</i>	typo
BA-20	Bob Abrams	Technical	--	19	1st paragraph	<i>The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.</i>	Is there any proposal to replace these two key wells with new or other wells? It would counterbalance the negative.
BA-21	Bob Abrams	Editorial and Technical	--	22	Table 2-4b	--	Title of last "Outflow" column is "Subsurface flow to the ELPMAa" Footnote "a" states, "Represents simulated underflows from the East Las Posas Management Area" Do these contradict? Footnote should say "to"? With respect to flow from WLPMA to ELPMA, reference Section 5.1.1 because new finding and still being evaluated.
BA-22	Bob Abrams	Editorial	--	23	Table 2-4c	--	First column of "Outflow" is "Outflow to PV1" Should that be PVB?
BA-23	Bob Abrams	Technical	--	26	Table 2-6	--	Column labeled "Aquifer" has many instances of "Unknown" Can the aquifer be ascertained by well depth, well completion data, local stratigraphy, well chemistry etc? Collecting data from wells without knowing the aquifer diminishes the value of that data. Doing statistics on data of unknown provenance is questionable/not robust
BA-24	Bob Abrams	Technical	--	28	4th paragraph ELPMA groundwater quality	<i>While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period</i>	Increasing trends are noted in a number of wells. While the conclusion is that there is no link between increasing trends and GW production, there is a notable absence of explanations for the increasing trends. If not GW production, then what local conceptual site model is postulated to cause the increases?
BA-25	Bob Abrams	Technical	--	28	2.5.2.1 WLPMA	<i>TDS concentration data do not indicate that groundwater production since 2015 has caused degradation of groundwater quality</i>	The previous sentence suggests increases are occurring in wells completed in the USP, but not in the FCA/GCA. Would a hypothetical conceptual model be that groundwater production is pulling higher TDS water down from the USP and that there is a link? What is the TDS of USP groundwater?
BA-26	Bob Abrams	Editorial	--	40	3.1.2.3.2 last sentence	<i>A formal agreement to ensure future maintenance of these non-native flows will be evaluated as through the Basin Optimization Plan.</i>	typo

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BA-27	Bob Abrams	Technical	--	41	Table 3-1	<i>Estimated Accrued Benefits at Completion: Recovery of groundwater levels that have contributed to seawater intrusion in the Oxnard Subbasin.</i>	Is not the biggest benefit of reduced groundwater production the reduced possibility of adverse effects, rather than a specific effect in Oxnard Subbasin?
BA-28	Bob Abrams	Technical	--	51	4.1.1.1.	<i>Projects have been identified to install additional monitoring wells and transducers in existing wells that would address data gaps in the ELPMA</i>	Why none in the WLPMA?
BA-29	Bob Abrams	Editorial	--	64	4.3.2.3	<i>Between 2003 and 2022, recycled water in the ELPMA was used exclusively for municipal and industrial uses.</i>	Missing word?
BA-30	Bob Abrams	Editorial	--	70	5.2.1.3	<i>climate change factors - , with the noted exception that</i>	typo
BA-31	Bob Abrams	Editorial	--	73	5.2.2	<i>...model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS of the Oxnard Subbasin, ;</i>	typo
BA-32	Bob Abrams	Technical	--	226 and 228	Figures 5-23a, b	--	Why are the simulated hydrographs shifted by -60 and +70 feet?
BA-33	Bob Abrams	Technical	--	73	5.2.2	<i>Due to the connection between the WLPMA and Oxnard Subbasin, the sustainable yield was evaluated using the model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS of the Oxnard Subbasin,, (2) no landward migration of the saline water impact front in the Oxnard Subbasin, and (3) no chronic lowering of groundwater levels in WLPMA.</i>	Understood that the subbasins are connected, but shouldn't the focus of sustainability be on the LPVB? The numerous particle tracking figures don't even show the LPVB. What is a LPVB stakeholder supposed to think about this?
BA-34	Bob Abrams	Editorial	--	89	--	<i>No New Projects Scenario Model Results</i>	Should this be 'Arundo Removal Scenario Model results'?
BA-35	Bob Abrams	Technical	--	97	6.2.2.	<i>the existing monitoring network in the LPVB is sufficient to document groundwater and can be used to document progress toward the sustainability goals for the LPVB.</i>	The loss of key well monitoring wells has not really been addressed – either the GSP had too many key wells, or this statement isn't really true?
BA-36	Bob Abrams	Editorial and Technical	--	98	6.2.2.1	<i>The removal of 02N21W16J03S limits characterization of groundwater conditions in the eastern part of WLPMA, where groundwater elevations are influenced by operations in the Oxnard Subbasin</i>	Typo. Also, are GW elevations in the eastern part of WLPMA influenced by Oxnard? More likely wells in western part of WLPMA?
BA-37	Bob Abrams	Technical	--	98	6.2.2.1	<i>As noted above, FCGMA anticipates evaluating projects that help to fill these critical data gaps as part of the Basin Optimization Plan</i>	Insufficient urgency demonstrated? Only one new well installed since 2019.
BA-38	Bob Abrams	Editorial	--	107	8.3	<i>with FCGMA holding regular meetings with to coordinate on projects</i>	typo
BA-39	Bob Abrams	Editorial	--	110	9.3	<i>Because the Judgment is still being implemented and subject to appellate court review, the effect of the Judgment on FCGMA's implementation of the LPV GSP and sustainable management of the LPV Basin is uncertain at this time.</i>	Not clear what this sentence achieves? Suggest rewording or deleting (ame as p ES-2, above)
BA-40	Bob Abrams	Editorial	--	112	10	<i>Revisions Reductions to the monitoring network, including the key well network</i>	The word "reduction" is a more accurate representation of facts

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TM-1	Tony Morgan	Editorial	--	ES-1	Table ES-1, 4th row, last column	--	subsidence is not discussed in Section 7.2
TM-2	Tony Morgan	Technical	--	7	2.2.1.1	<i>prevent chronic lowering of groundwater levels</i>	is chronic lowering of water levels currently a WLPMA condition? That message doesn't seem to be a prevalent message throughout the document.
TM-3	Tony Morgan	Technical	--	7	2.2.1.2, first paragraph	<i>to limit the area of the FCA that would convert from confined to unconfined conditions with declining water levels,</i>	the undesirable condition is a conversion of the aquifer from confined to unconfined. The following paragraph moves from a discussion of the aquifer transitioning from confined to unconfined, to an individual well?
TM-4	Tony Morgan	Technical	--	7	2.2.1.2, second paragraph	<i>would result in projected groundwater elevations that are below the top of the well screen in nine wells</i>	declines in water levels to below the top of screen does not necessarily equate to the dewatering of the aquifer. Not clear how this analysis helps assess the potential for CONF-UNCONF conversion. A more powerful analysis would be to determine the tops of the confined aquifer and then compare to a declining water level.
TM-5	Tony Morgan	Editorial	--	24	2.3.2.1, Lower Aquifer System	<i>approximately 32,970 AF since 2015 (Table 2-5)</i>	value doesn't match Table 2-5
TM-6	Tony Morgan	Editorial	--	24	Table 2-5., West Las Posas / LAS row	--	-34,780+1,810 = -32,970
TM-7	Tony Morgan	Technical	--	26	2.5.1	<i>describe efforts to evaluate the connection between groundwater production and groundwater quality</i>	Was this accomplished in the document?
TM-8	Tony Morgan	Technical	--	26	2.5.1	<i>progress made toward evaluation of the causal relationship referenced in the GSP.</i>	Where is this addressed in the document?
TM-9	Tony Morgan	Technical	--	28	2.5.1.2, last paragraph	<i>While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period,</i>	Where are these data presented?
TM-10	Tony Morgan	Technical	--	32	2.6.2	<i>critical infrastructure</i>	What are the critical infrastructure? Their location(s) are not shown on Fig 2-29.
TM-11	Tony Morgan	Editorial	--	35	3	<i>Both the Basin Optimization Plan and Basin Optimization Yield Study are developed by FCGMA, as Watermaster for the LPVB, with consultation, review, and recommendation from the LPVB PAC and TAC.</i>	Change to: "Both the Basin Optimization Plan and Basin Optimization Yield Study are planned to be developed by FCGMA, as Watermaster for the LPVB, with consultation, review, and recommendation from the LPVB PAC and TAC."
TM-12	Tony Morgan	Technical	--	37	3.1.1.1.3, Impacts to beneficial uses and users	<i>potential groundwater-surface water connections.</i>	these connections are not highlighted/identified in this document. Why mention them here?
TM-13	Tony Morgan	Technical	--	39	3.1.2.1.2, Expected Benefits	<i>prevent declines in groundwater elevation, loss of storage, and land subsidence by</i>	These benefits are logical, but are they actually needed to lessen declines in groundwater elevations, loss of storage, or land subsidence. Other sections in this document do not identify undesirable results associated with them (e.g., subsidence).
TM-14	Tony Morgan	Technical	--	39	3.1.2.1.2, Impacts to beneficial uses and users	<i>chronic lowering of groundwater levels,</i>	is chronic lowering of groundwater a risk in the WLPMA?
TM-15	Tony Morgan	Editorial	--	40	3.1.2.3.2, Realized Benefits, second paragraph	<i>A formal agreement to ensure future maintenance of these non-native flows will be evaluated as through the Basin Optimization Plan.</i>	typo
TM-16	Tony Morgan	Editorial	--	41	Table 3-1, first row, second column	<i>Reduce Groundwater production by monitoring and imposing quantitative limits on pumpers; with governing authority from the FCGMA Board as the Watermaster.</i>	recommend adding red text
TM-17	Tony Morgan	Editorial	--	42	3.2.1.1	<i>decrease groundwater demand in the LPVB by 2,300 AFY.</i>	section below says groundwater demand would be decreased by 500 AFY
TM-18	Tony Morgan	Editorial	--	42	3.2.1.2, Expected Benefits	<i>It is estimated that implementation of this project would decrease groundwater demand in the LPVB by approximately 500 AFY.</i>	paragraph above says groundwater demand would be decreased by 2,300 AFY

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TM-19	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	<i>which directly addresses undesirable results associated with degraded water quality,</i>	what degraded water quality impacts are attributable to the GSP's management of the basin?
TM-20	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	<i>reducing groundwater demands in the LPVB.</i>	how does the pumping of groundwater to supply the desalter achieve a reduction in groundwater demands?
TM-21	Tony Morgan	Technical	--	43	3.2.1.2, Impacts to beneficial uses and users	<i>helping to prevent groundwater elevation declines</i>	the desalter needs a source of water to treat - groundwater. Not clear how this project reduces groundwater demand and therefore prevents groundwater elevation decline.
TM-22	Tony Morgan	Technical	--	44	3.2.3.1	<i>would provide up to 2,000 AFY of recharge.</i>	how much of the 2,000 AFY of recharge would have normally been recharged downstream of the percolation ponds or in the PVB? Is this expected to be 2,000 AFY net of the "normal" recharge?
TM-23	Tony Morgan	Technical	--	45	3.2.4.1	<i>would provide data on whether the vegetation in the riparian corridor relies on groundwater or soil moisture from infiltrating surface water.</i>	other sections stated that vegetation is not dependent on groundwater. This seems to be backtracking on the conclusions offered elsewhere.
TM-24	Tony Morgan	Editorial	--	54	4.3.2.1	<i>approximately 35,100 AFY of groundwater</i>	Recommend changing to "...an average of approximately 35,100 AFY of groundwater..."
TM-25	Tony Morgan	Technical	--	77	Table 5-2, first column, second row	<i>Seawater Flux into the Oxnard Subbasin^b</i>	it is a little misleading to show the SWI values as a single number when in reality the modeling results have an error bar associated with them (e.g., 500 AFY +/-200 AFY). The single value presented in the table suggests a more exact rate than we have data to support. Can error estimates be added to the table?
TM-26	Tony Morgan	Editorial	--	77	Table 5-2, footnotes	--	Last footnote should be 'd'
TM-27	Tony Morgan	Technical	--	98	6.2.2.3	<i>13 wells that were to be monitored for groundwater quality are no longer monitored for groundwater quality.</i>	Seem appropriate to provide the reader with some idea of why so many wells are no longer monitored. Were the wells destroyed, landowner access denied, data determined to be redundant, monitoring entity dropped these wells from their suite of monitored wells, or ??.
TM-28	Tony Morgan	Technical	--	99	6.4	<i>monitor subsidence</i>	Is it anticipated that an annual report will be produced? Will the report address inferred land surface movement near critical infrastructure? If so, what infrastructure?
TM-29	Tony Morgan	Editorial	--	103	7.1.3	<i>As described in Section 3.1, Evaluation of Projects and Management Actions, the Judgment adjudicated water rights in the basin and established an allocation system based on those water rights. The Judgment allocations supersede the allocations developed and adopted by FCGMA in 2019.</i>	This paragraph seems to fit better in 7.1.2 Extraction Allocations.
TM-30	Tony Morgan	Technical	--	110	9.3, Las Posas Valley Water rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700	<i>adopts a physical solution that requires FCGMA to prepare new studies and reports designed to maintain an annual operating yield for the LPVB at 40,000 AFY</i>	This GSP puts the sustainable yield at ~27K-34K AFY with projects. The judgment requires a sustainable yield of 40K AFY. What is the GSA (Watermaster?) doing to get to the 40K AFY value? Was this discussed in the GSP?
TM-31	Tony Morgan	Technical	--	Appendix A, A-1	A.1	<i>identify specific locations where Arroyo Simi-Las Posas is connected to the underlying aquifer and</i>	Is there a map or ?? showing these locations?
TM-32	Tony Morgan	Technical	--	Appendix A, A-2	A.2, first paragraph on page	<i>recharge of the surface water discharges</i>	Helpful to reader to identify these surface water discharges. Can the surface water discharges be quantified (e.g., time series)? What values were used for the groundwater model?
TM-33	Tony Morgan	Technical	--	Appendix A, A-2	A.3, last sentence in first paragraph	<i>This indicates that groundwater production in the principal aquifers of the ELPMA has not impacted the groundwater level in the shallow alluvial aquifer adjacent to the Arroyo near well MMW-1.</i>	This implies limited interconnection between the principal and shallow aquifers. Is this conclusionary statement consistent with the findings from the groundwater flow model? If so, suggest stating the model is supportive of these observations. If not, then why the difference.

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TM-34	Tony Morgan	Technical	--	Appendix A, A-2	A.4, first paragraph	<i>interconnected surface water bodies</i>	Were the interconnected surface water bodies identified?
TM-35	Tony Morgan	Editorial	--	Appendix A, A-2	A.4, first paragraph	<i>has not occurred in relation to current groundwater production, although this could occur in the future if upstream surface water discharges decrease.</i>	is this sentence saying that depletions of interconnected surface waters due to pumping could occur if upstream surface water discharges decrease? Suggest splitting the sentence into two. Add a period after "...groundwater production." Create a new sentence to say "Interconnected surface water bodies could occur in the future if upstream surface water discharges decrease."

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CT-1	Chad Taylor	Editorial	--	1	Table 1-1, fourth row, second column	<i>As a result, FCGMA anticipates approximately more flow in Arroyo Simi-Las Posas than previously assumed for the GSP</i>	Is this a typo, or should a value of additional flow be included here?
CT-1	Chad Taylor	Technical	--	1	Table 1-1	<i>Infrastructure Improvements to Zone Mutual Water Company's water delivery system</i>	This project may need to be modified based on feedback from Bryan Bondy regarding ZMWC's ability to finance improvements. TAC recommendations on the projects for the Basin Optimization Plan include changing this to a Basin-wide feasibility study to increase transfers between management areas.
CT-1	Chad Taylor	Technical	--	2	Table 1-1	<i>Projects to Address Data Gaps, Installation of Additional Groundwater Monitoring Wells and Installation of Additional Groundwater Monitoring Wells</i>	These are important projects that should be advanced quickly. See later comments on monitoring adequacy.
CT-1	Chad Taylor	Editorial	--	4	2.1, second paragraph on page	<i>At the time the GSP was prepared, the groundwater elevations were below the minimum threshold groundwater elevations in the at four of the five key wells in WLPMA, the only key well in the Epworth Gravels Management Area, and one well in the ELPMA.</i>	Typo
CT-1	Chad Taylor	Technical	--	7	2.2.1.2, second paragraph	<i>The depth and groundwater production rates from the wells in this area indicate that they are agricultural wells and are not domestic or de minimis wells that produce less than 2 acre-feet per year (AFY).</i>	Recommend showing the all the data included in and results of this analysis in figures and tables. Table 2-1 shows only perforated interval depths, not production rates that would distinguish domestic wells from those for other uses.
CT-1	Chad Taylor	Technical	--	8	Table 2-1, 6th column	--	18 percent of wells (4 of 22) with reduced capacity seems high
CT-1	Chad Taylor	Technical	--	8	Table 2-1, 7th column	--	2 wells out of 22 is 9%. That is a fairly large percentage of wells going dry.
CT-1	Chad Taylor	Technical	--	8	2.2.1.2, second paragraph on page	<i>Loss of production at the minimum threshold groundwater elevations represents a loss of between 1% and 3% of the total production from the management area.</i>	The DWR Recommended Corrective Action requested discussion of the effects of the MTs and MOs on beneficial uses and users. This analysis only discusses the MTs. Additionally, contextualizing the reductions in production ability from these wells in the context of the entire production from the management area may not meet DWR expectations regarding effects on beneficial users. Recommend including discussion of effects on individual well owners. Also, will there be a dry well mitigation program in case wells do go dry?
CT-1	Chad Taylor	Technical	--	9	2.2.1.3, first paragraph	<i>As groundwater elevations decline in the Epworth Gravels aquifer, groundwater users in this management area rest their Epworth Gravels aquifer wells and rely on water from the FCA instead.</i>	Can this practice be incorporated into a management action?
CT-1	Chad Taylor	Editorial	--	9	2.2.1.3, second paragraph	<i>The GSP reported on groundwater conditions through fall 2015. The change in water levels since 2015 varies geographically within the LPVB, reflecting both the influence of groundwater extraction and the availability and extent of groundwater recharge in the WLPMA, ELPMA, and Epworth Gravels Management Area.</i>	This paragraph seems out of place. Is it supposed to follow the header for 2.2.2?
CT-1	Chad Taylor	Editorial	--	9	2.2.2.1 Upper San Pedro Formation	<i>There are no key wells screened in the USP because it is not a primary aquifer...</i>	Should primary be principal?

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CT-1	Chad Taylor	Technical	--	9	2.2.2.1 Fox Canyon Aquifer	<i>In the western part of the WLPMA, adjacent to the Oxnard Subbasin, fall 2023 and spring 2024 groundwater elevations in the FCA were approximately 55 to 35 feet higher than they were in fall 2015 and spring 2015, respectively (Figure 2-7, Fox Canyon Aquifer – Groundwater Elevation Changes from Fall 2015 to 2023, and Figure 2-8, Fox Canyon Aquifer – Groundwater Elevation Changes from Spring 2015 to 2024). Groundwater elevations in this part of the WLPMA were also higher than they were in fall 2019, the start of the current evaluation period (FCGMA 2021). Groundwater elevation recoveries in the western WLPMA since 2015 reflect the influence of UWCD’s recharge operations in the Forebay Management Area of the Oxnard Subbasin, which promoted groundwater elevation recoveries in the Oxnard Subbasin of approximately 120 feet between 2015 and 2024 (FCGMA 2024a).</i>	These statements are based solely on one monitoring well at the extreme western end of the WLPMA. That data limitation should be discussed somewhere.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1, first paragraph on page	<i>In contrast, groundwater elevations in the eastern part of the WLPMA were lower in the fall of 2023 than they were in fall 2015 (Figures 2-7)8. The largest groundwater elevation decline measured over this period was at well 02N20W06R01S, where the fall 2023 groundwater elevation was approximately 80 feet lower than fall 2015 (Table 2-2, Water Year 2024 Groundwater Elevations at Key Wells in the Las Posas Valley Basin; Figures 2-7 and 2-8). Groundwater elevation declines in the eastern WLPMA reflect ongoing groundwater production in an area with limited groundwater recharge.</i>	The lack of consistent monitoring for comparing water levels may be the cause of the apparent difference between fall and spring comparisons. Inconsistent monitoring makes tracking sustainability very challenging, especially when there are so few Key Wells in the network. This problem may be skewing the assessment of sustainability and should be addressed immediately by adding dedicated monitoring wells that the FCGMA/Watermaster monitors or uses transducers to reliably measure water levels regularly.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1 Grimes Canyon Aquifer	<i>Two wells, 02N21W28A02S and 02N21W22G01S, had groundwater elevations measured in both spring 2015 and spring 2024.</i>	Spring to spring declines with no fall comparison due to inconsistent monitoring should raise concern.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, first paragraph	<i>The GSP defined interim milestones for the key wells with groundwater elevations below the measurable objectives, so that groundwater elevations would reach the measurable objectives by 2040 (FCGMA 2019).</i>	Recommend referencing relevant section discussing Interim Milestones.
CT-1	Chad Taylor	Technical	--	14	2.2.3.1, second paragraph	<i>FCGMA has relied on other agencies for monitoring data but recognizes the need for more consistent monitoring of groundwater elevations in the WLPMA</i>	This should be prioritized using available funding sources, not waiting for grant funding as alluded to in other sections. Has the FCGMA considered the Technical Support Services available through DWR? Those may not be available now that the Basin is adjudicated, but worth asking about.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, second paragraph	<i>anticipates that groundwater elevations will rise between 2025 and 2040 with the implementation of projects and management actions in the WLPMA that are consistent with the GSP and Judgment.</i>	This seems a weak statement without further explanation of the mechanisms for increased groundwater elevations. Specifically, "anticipates" and "will rise" are very passive.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.2	<i>In 2015, the end of the GSP reporting period, groundwater elevations in the WLPMA were above than the minimum threshold water levels at four of the five key wells in the management area (FCGMA 2019).</i>	Typo

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CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	<i>measured in three of the five key wells were measured in three of the five key wells</i>	40 percent of key wells were not monitored and 2/3 of those that were monitored were below the MT. The importance of more consistent monitoring cannot be stressed highly enough.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.2, first paragraph on page	<i>...minimum thresholds (Table 2-1).</i>	Table 2-2?
CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	<i>Spring 2024 groundwater elevations were above the minimum threshold groundwater elevations at all of the key wells measured in the WLPMA</i>	The spring 2024 measurements also included only 60% of Key Wells and the well that was furthest below the MT in fall 2023 was not included.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	<i>Fall 2023 groundwater elevations were below the 2025 interim milestones in the two the key wells</i>	missing word
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	<i>established interim milestones (Table 2-1).</i>	Table 2-2?
CT-1	Chad Taylor	Technical	--	17	2.2.5.3	<i>gained and updated numerical modeling conducted for this periodic evaluation (see Section 5, Updated Numerical Modeling) suggest that these thresholds are appropriate to prevent undesirable results in the LPVB</i>	This makes it sound like there is uncertainty regarding the effectiveness of the thresholds. Can this be strengthened, or is there significant uncertainty?
CT-1	Chad Taylor	Technical	--	19	2.2.5.3, last sentence of first paragraph on page	<i>The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.</i>	SGMA characterizes data gaps as "a lack of information that significantly affects the understanding of basin setting or evaluation of the efficacy of the Plan implementation, and could limit the ability to assess whether a basin is being sustainably managed." Data gaps include not only limited geographic representation, but also monitoring sites that are unreliable. Once identified, as GSA must include a description in the GSP that addresses the data gaps (23CCR §354.38.) As noted above, a plan to address these data gaps should be developed and implemented as soon as possible.
CT-1	Chad Taylor	Technical	--	19	2.3	--	While this section does acknowledge that undesirable results have occurred, it does not appear to address the DWR RCA request for discussion of potential effects of MTs and MOs on beneficial uses and users. Recommend including a discussion to this effect to address the DWR request.
CT-1	Chad Taylor	Technical	--	22	Table 2-4b	--	Why does this table show the average and not the total change in storage over the period? The sum of the annual changes in storage is a loss of 34,777 AF, which is 3.3 times the average annual inflow to the WLPMA. By comparison, the total change in storage for the ELPMA over the same period was a loss of 2,824 AF, which is only 10% of the average annual inflow to the management area. Recommend including and discussing the change in storage over the period as it represents significant sustained storage decline.
CT-1	Chad Taylor	Technical	--	24	2.3.2.1, Lower Aquifer System	<i>During the 2004 through 2010 period, the VRGWF estimates that groundwater in storage in the LAS increased by approximately 1,810 AF (Table 2-5).</i>	Please explain this calculation. As presented it appears that the change in storage for the entire period of 2004 through 2010 was an increase of 1,810 AF, but the table makes it appear to be an estimate of annual storage change.
CT-1	Chad Taylor	Editorial	--	24	Table 2-5, second row, 6th column	-35,970	should this be -32,970 as in the text above?
CT-1	Chad Taylor	Editorial	--	24	Table 2-5, East Las Posas information	--	Recommend explaining how the values in this table relate to those in Table 2-4c

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CT-1	Chad Taylor	Technical	--	26	Groundwater Quality	--	DWR's RCA for water quality included a request to further describe efforts to evaluate connections between groundwater production and quality, including evaluation of the "casual relationship" referenced in the GSP and document details of a process for determining if groundwater management and extraction are causing adverse impacts to groundwater quality. This discussion and documentation do not appear to have been included and neither is there a statement addressing DWR's request.
CT-1	Chad Taylor	Technical	--	27	2.5.1.1	<i>Water quality in this area has been impacted by historical land uses and is generally tied to groundwater elevation (FCGMA 2019).</i>	This references the "casual relationship" DWR mentioned, but does not explain the reasons behind the statement or provide any plan for further assessment. Recommend being very careful about statements concerning connections between groundwater elevations and quality without evidence.
CT-1	Chad Taylor	Technical	--	31	2.5.4	<i>changes in the groundwater quality do not appear to be correlated with decreases in groundwater elevation.</i>	Section 2.5.1.1. says there is a relationship. See comment on that section.
CT-1	Chad Taylor	Technical	--	42	3.2.1	--	This project may need to be revised based on recent information presented to the TAC. See TAC Recommendation Report on the Basin Optimization Plan projects.
CT-1	Chad Taylor	Technical	--	44	3.2.4	--	Recommend advancing this project as quickly as possible
CT-1	Chad Taylor	Technical	--	45	3.2.5	--	Recommend advancing this project as quickly as possible
CT-1	Chad Taylor	Technical	--	51	4.1.1.1, second paragraph	<i>These revisions are described in FCGMA (2024a).</i>	Please include information regarding the understanding of the LPVB and relevant information about the connection to Oxnard in this document.
CT-1	Chad Taylor	Technical	--	55	4.3.2.1, Comparison to Projected Groundwater Supplies	<i>approximately 10% lower than the average annual groundwater extractions over the 2021 and 2022 water years.</i>	42,400 - 36,100 = 6,300 AFY, and 6,300/42,400 = 15% (14.858).
CT-1	Chad Taylor	Technical and Editorial	--	67	5.1.1, third paragraph	<i>These updates are summarized in FCGMA (2024a).</i>	Please include all new information relevant to the LPVB in this document
CT-1	Chad Taylor	Technical	--	68	5.1.1, first paragraph on page	<i>of the fault. As a result, the Coastal Plain Model simulates subsurface flows from the WLPMA to the ELPMA (Table 2-4c). These modeled flows are not integrated into the modeling conducted for the ELPMA.</i>	Why are the modeled flows between WLPMA and ELPMA not integrated into the modeling for the ELPMA? This raises a concern that the two LPVB management areas are not being modeled in a similar or complimentary way. The statement implies that the ELPMA model still uses a no flow boundary at the Somis Fault, which would be expected to produce very different flow and water budget results when compared to the Coastal Plain model that has a partial general head boundary along the fault. The potential for flow between ELPMA and WLPMA in the coastal plain model may also have an impact on seawater intrusion in Oxnard, and that potential is not discussed. Recommend reconsidering the disparity in the way the Somis Fault is modeled in the Coastal Plain and ELPMA models.
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.1, third paragraph on page	<i>A broader discussion of updates to the Coastal Plain Model will be detailed in a technical memorandum prepared by UWCD.</i>	Where is this document? This seems like important information for the LPVB 5-Year GSP Evaluation
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.2.1	<i>The ELPMA model extension, and validation, will be detailed in a technical memorandum prepared by FCGMA.</i>	When will this be available? Shouldn't this be available for committee review?
CT-1	Chad Taylor	Editorial	--	69	5.1.2.1, first sentence on page	<i>simulation of future groundwater conditions.</i>	Sentence fragment
CT-1	Chad Taylor	Technical	--	73	5.2.2	--	How do flows between WLPMA and ELPMA differ in the two models?

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CT-1	Chad Taylor	Technical	--	78	5.2.2.1.3, No New Projects Scenario Assumptions	--	The percent change referenced for PVB is not consistent with the annual pumping values presented in the assumption summaries. I suspect this is a function of how the information is presented, but it should be checked and the text or percentages/volumes corrected. For instance, in NPP1 the summary says "a 20% reduction in both aquifer systems in the PVB and WLPMA" then references production volumes of "13,200 AFY in the PVB, and 10,800 AFY in the WLPMA." Comparing 13,200 AFY for NPP1 in the PVB to 13,900 AFY in Future Baseline shows a change of -5%, not 20%. All other scenarios have similar results when compared to baseline.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield without Future Projects	<i>All three simulations performed under the NNP Scenario avoided chronic lowering of groundwater levels in the WLPMA and reduced seawater intrusion in the LAS of the Oxnard Subbasin during the 30-year sustaining period and resulted in net freshwater loss from the UAS of the Oxnard Subbasin to the Pacific Ocean. Therefore, the simulation with the highest overall production rate, that also minimized impacts from adjacent basins, was identified as the best estimate of the sustainable yield of the Oxnard Subbasin, PVB, and WLPMA, in the event that no new future projects are implemented in each basin. The simulation with the highest total groundwater production rate from this scenario was NNP3 – under this simulation, an average of approximately 11,400 AFY of groundwater was pumped from the WLPMA (Section 5.2.2.1.3 No New Projects Model Scenario). This estimate of the sustainable yield is approximately 1,100 AFY lower than the estimate presented in the GSP (FCGMA 2019). Applying the estimate of sustainable yield uncertainty calculated during the development of the GSP for the sustaining period suggests that the sustainable yield of the WLPMA may be as high as 12,600 AFY or as low as 10,200 AFY (FCGMA 2019).</i>	This appears to be an arbitrary means of estimating sustainable yield. The values listed are simply the results of one of several production reduction scenarios not an assessment of the maximum "amount of groundwater that can be withdrawn annually without causing undesirable results." (DWR BMP for Sustainable Management Criteria, November 2017). The SMC BMP also indicates that sustainable yield should be a single value, not a range as presented here. Please provide more information regarding the methods for estimating uncertainty in the sustainable yield estimate.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with Future Projects	--	See comment on sustainable yield without future projects regarding how to define sustainable yield.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with Future Projects, third paragraph	<i>the sustainable yield of the WLPMA may be as high as approximately 13,040 AFY or as low as 10,640 AFY.</i>	Please explain how this range was estimated.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with UWCD's EBB Water Treatment Project	--	See comment on sustainable yield without future projects regarding how to define sustainable yield.
CT-1	Chad Taylor	Technical	--	91	5.2.3.1, Sustainable Yield with UWCD's EBB Water Treatment Project, second paragraph on page	<i>approximately 14,700 AFY or as low as 12,300 AFY.</i>	Please explain how this range was estimated.

**Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin**

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield without Future Projects	--	See comment on WLPMA sustainable yield without future projects regarding how to define sustainable yield.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield without Future Projects, second paragraph	--	Please explain how this range was estimated.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield with Future Projects	--	See comment on WLPMA sustainable yield without future projects regarding how to define sustainable yield.
CT-1	Chad Taylor	Technical	--	97	6.2.2	--	See previous statements about consistency and the effects of data gaps on sustainable management.
CT-1	Chad Taylor	Technical	--	97	6.2.2.1, last paragraph on page	<i>Importantly, since adoption of the GSP, several groundwater level monitoring wells have been removed from the monitoring network, including two key wells (Figure 6-3):</i> <ul style="list-style-type: none"> ▪02N20W04F02S, which was destroyed; and ▪02N21W16J03S, which has not been measured since 2019. 	Is the monitoring network still adequate with the removal of these wells?
CT-1	Chad Taylor	Editorial	--	106	8		Recommend including discussion of the TAC and PAC here as they are outreach, engagement, and coordination components

Attachment 4

**Watermaster Response to TAC Recommendation Report, Basin Optimization
Plan Tasks 1 and 2**

Item 24 - Exhibit 24C – Watermaster Response Report - Basin Optimization Plan Tasks 1 & 2

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: September 19, 2024

To: Las Posas Valley Watermaster Board of Directors

From: Kudzai Farai Kaseke, Assistant Groundwater Manger (FCGMA)

Re: Response Report to TAC Consultation Recommendation Report on Basin Optimization Plan Tasks 1 and 2

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Technical Advisory Committee (TAC) on the first two tasks of Basin Optimization Plan development. Watermaster's request was in a July 10, 2024, memorandum to the TAC. The TAC discussed and developed its recommendation report at the July 31, 2024, and August 27, 2024, meetings. TAC's August 27, 2024, recommendation report included three comments and four recommendations. Each of these are listed below followed by Watermaster staff's recommendations.

Comment 1:

Projects 2 and 9 (Importing of surplus water and using Calleguas facilities for replenishment, respectively) appear to be effectively one project with Project 9 a subset of Project 2. The Calleguas Mutual [sic] Water District (CMWD) TAC representative (Mr. Bryan Bondy, PG, CHG) reported that CMWD does not believe they are the correct project proponent for these projects. The representative indicated CMWD can provide input and assist with cost estimation but cannot define timing and logistics for importing surplus water for replenishment; this should be a shared responsibility.

Response to Comment 1:

These were two of the nine projects identified in the Basin Adjudication Judgment: section 5.4.2 "Importing of surplus water," and section 5.4.9 "Using Calleguas facilities for Replenishment." No further explanation of these projects is provided in the Judgment and Watermaster staff agree that these two projects together appear to describe the project identified in the Groundwater Sustainability Plan as "Purchase of Imported Water from CMWD for Basin Replenishment." This project consists of supplying imported water to CMWD member purveyors to supply operators in the West Las Posas Management Area in lieu of pumping. Watermaster staff notes that CMWD does not believe that they are the correct project proponent. Watermaster will work with CMWD and its purveyors to better define the project(s) and appreciates CMWD's input and assistance with cost estimation.

Comment 2:

Mr. Bondy also reported that since the 2022 GSP Zone Mutual Water Company (Zone MWC) decided not to pursue grant funding for the infrastructure upgrades necessary to support the in-lieu water delivery within the Zone MWC service area identified in Project 7. Mr. Bondy reported that Zone MWC would like to request that the Watermaster replace Project 7 with an in-lieu delivery option feasibility study. Such a study could assess the potential for in-lieu water deliveries from other local agencies capable of delivering water from east Las Posas Valley to west Las Posas Valley. The study could include a review of existing infrastructure in the service areas of all the local agencies to identify opportunities, constraints, and costs associated with in-lieu water delivery.

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Response to Comment 2:

Project 7 is identified in Judgment section 5.4.7 as “Designing and constructing new or modified infrastructure in order to deliver In Lieu Water to water deficit areas for Use in lieu of Extracted Groundwater and to increase water conveyance within the Basin.” Watermaster staff believe this project description is broad enough to include defining a feasibility study as recommended by the TAC.

Comment 3:

The TAC has no additional information on potential project proponent(s) for Project 6.

Response to Comment 3:

Watermaster appreciates the feedback from TAC that it has no additional information regarding this project or project proponent(s).

Recommendation 1:

Provide additional documentation of the process for defining, reviewing, and evaluating project components. Additionally, the TAC recommends considering and identifying critical path items or fatal flaws identified in any individual projects.

Response to Recommendation 1:

The process for defining, reviewing, and evaluating, each project includes review of the criteria listed in section 5.3.2.1 of the Judgment, which are included in the Project Evaluation Checklist; review of additional information that may be available regarding each proposed project; and ranking the projects using the Project Ranking Sheet. Additional information about project evaluation is provided in Dudek’s December 27, 2023, scope of work to prepare the Basin Optimization Plan which was approved by the Watermaster Board at the January 12, 2024, special meeting. Critical path items or fatal flaws will be evaluated as part of this process.

Recommendation 2:

Develop methods for evaluating how projects might affect groundwater quality and local undesirable conditions like pumping depressions, the effects of multiple projects on one another, and who the direct and indirect beneficiaries of each project would be.

Response to Recommendation 2:

Each project will be evaluated for potential impacts on (i) groundwater levels, (ii) groundwater in storage, (iii) groundwater quality, (iv) land subsidence, (v) natural recharge, and (vi) minimum thresholds and measurable objective set forth in the Groundwater Sustainability Plan. Based on the information provided by each project proponent, a qualitative description of the potential benefits and/or negative impacts resulting from the project will be prepared. If a project is anticipated to cause undesirable results or result in material injury, the information provided by the project proponent will be used to characterize the number and location of surrounding groundwater extraction wells and users that may be impacted by the project.

Recommendation 3:

Include additional criteria addressing effects (positive or negative impacts) on sustainability criteria with a point scale of 1 to 20 in five categories, similar to the project implementation timeframe criteria.

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Response to Recommendation 3:

Watermaster staff developed the following criteria based on TAC’s recommendation to replace criterion number 14:

What impact will the project have on sustainability indicators applicable to the LPVB (i.e., chronic lowering of groundwater levels, reduction of groundwater in storage, degraded groundwater quality, land subsidence, depletions of interconnected surface water)?

1	5	10	15	20
May have negative impact on sustainability indicator.	Does not address sustainability indicators.	May help mitigate one sustainability indicator.	May help mitigate two sustainability indicators.	May help mitigate three or more sustainability indicators.

Recommendation 4:

Solicit additional projects from stakeholders for inclusion and prioritization as part of the Basin Optimization Plan. This could include supplementing areas with limited natural recharge, filling data gaps with addition monitoring, assessing and improving irrigation efficiency, water level optimization through management of pumping locations and depths, or other projects identified by stakeholders.

Response to Recommendation 4:

Watermaster staff believe this is a good recommendation by the TAC, but for future Basin Optimization Plans, as there is insufficient time to conduct a solicitation for the current Basin Optimization Plan. The current Basin Optimization Plan needs to be completed expeditiously in order to conduct the Basin Optimization Yield Study. Staff notes that there have been solicitations for projects from stakeholders in the Basin including in 2018 for the Groundwater Sustainability Plan, in early 2022 from larger water purveyors in the Basin including CMWD, Berylwood Heights Mutual Water Company, Del Norte Mutual Water Company, City of Moorpark, Ventura County Waterworks Districts 1 and 19, and Zone Mutual Water Company (Item 23C). Additionally, the Judgment included nine projects to be evaluated in the Basin Optimization Plan.

Attachment 5

**Watermaster Response to TAC Recommendation Report, Scope for 2025 Basin
Optimization Yield Study**

Item 25 – Exhibit 25C

WATERMASTER RESPONSE REPORT

Date: September 19, 2024

To: Las Posas Valley Watermaster Board of Directors

From: Kudzai Farai Kaseke, Assistant Groundwater Manager (FCGMA)

Re: Response Report to TAC Consultation Recommendation Report on Draft Scope of Work to Prepare the Las Posas Valley Basin 2025 Optimization Yield Study

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Technical Advisory Committee (TAC) on a draft scope of work by Dudek dated December 27, 2023, to prepare the Las Posas Valley Basin 2025 Basin Optimization Yield Study. Watermaster's request was in a July 16, 2024, memorandum to the TAC. The TAC discussed and developed its recommendation report at the July 31, 2024, and August 27, 2024, meetings.

TAC's August 27, 2024, recommendation report included one comment and four recommendations. Each of these are listed below, followed by Watermaster staff's recommendations.

Comment 1:

The draft document does not include scope and budget to model and assess optimization yield in the West Las Posas Management Area (WLPMA). When is a scope and budget for modeling and assessing optimized yield in the WLPMA expected from United Water Conservation District (UWCD)? The Dudek scope of work indicates an assumption that UWCD will evaluate basin optimization using the same approach for the WLPMA as described in the Dudek scope for the East Las Posas Management Area (ELPMA), but this should be confirmed.

Response to Comment 1:

The draft scope of work and budget for UWCD to conduct numerical groundwater modeling for the WLPMA is currently being negotiated by agency staff and UWCD.

Recommendation 1:

Clarify that baseline simulations for the ELPMA will apply only the portion of pumping identified in the Judgment associated with that Management Area and not the entire 40,000 acre-feet per year (AFY) indicated in the scope of work.

Response to Recommendation 1:

Pumping for baseline simulations for the ELPMA will be based on allocations in the Groundwater Allocation Schedule prepared in accordance with the Judgment Annual Allocations Calculation for Water Rights Holders in the ELPMA. Pumping for baseline simulations in the WLPMA will similarly be based on allocations in the Groundwater Allocation Schedule for Water Rights Holders in the WLPMA.

Recommendation 2:

Clarify model scenario nomenclature and add a true baseline scenario. Task 2.1 is named Baseline Model Scenario. However, the scenario as described includes simulation of projects designed to

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increase yield. The baseline scenario should include future conditions without projects, then a subsequent scenario including projects can be compared to that baseline to assess the effects of the projects on groundwater conditions.

Response to Recommendation 2:

Dudek's scope of work has been revised to include, and UWCD's scope includes, an additional baseline scenario to simulate future groundwater conditions based on pumping as described in Response to Recommendation 1 without inclusion of projects.

Recommendation 3:

Add TAC and PAC consultation during model scenario development and evaluation in Tasks 1 and 2. The scope of work indicates that model scenarios and modeling results will not be reviewed by the TAC and PAC, but there may be important questions that need to be answered during scenario development and model analysis and consultation with the committees should be required.

Response to Recommendation 3:

The December 27, 2023, Dudek draft scope of work included consultations with TAC and the Policy Advisory Committee (PAC) on the draft Basin Optimization Yield Study. The scope of work has been revised to consult with TAC at two points during preparation of the Study. The first consultation would be prior to conducting baseline scenario simulations. The second consultation would be following completion of the two baseline scenarios, but before initiating alternative pumping scenarios. As this is a technical study, no additional PAC consultations are proposed.

Recommendation 4:

Add sufficient scenarios to Task 2.2 to evaluate not only reduce [sic] pumping but also increase in-lieu use from alternative sources of water supply. This would allow for focused delivery of supplemental water to areas of the Basin where undesirable results are identified in the modeling instead of uniformly reducing pumping for all groundwater users, which may reduce the need for rampdown and allow policy makers to identify the "sweet spot" for supplemental water delivery and pumping reductions to eliminate undesirable results while limiting pumping restrictions.

Response to Recommendation 4:

TAC's recommendation represents a new project. Evaluation of focused supplemental water deliveries to specific areas to identify the "sweet spot" in lieu of pumping would require multiple simulations and evaluation of infrastructure requirements to focus these supplemental deliveries. As described in the Judgment, projects are to be evaluated as part of the Basin Optimization Plan. As discussed in the response report to TAC's August 27, 2024, recommendation report on Basin Optimization Plan Tasks 1 and 2, there is insufficient time to evaluate new projects for this Basin Optimization Plan and the proposed new project should be evaluated in a future Plan.