

TO: Las Posas Valley Watermaster

FROM: Las Posas Valley Watermaster Policy Advisory Committee

RE: Recommendation Report – Draft Las Posas Valley Basin 5-Year Groundwater Sustainability Plan (GSP) Evaluation

DATE: November 8, 2024

Recommendation:

See memo below for recommended changes/additions to the draft GSP Five-Year Update.

Policy Rationale for Recommendation:

See memo below for rationale.

Summary of Facts in Support of Recommendation:

See memo below for complete memo.

Tally of Committee Member Votes:

	YES	NO	ABSTAIN	ABSENT
Ian Prichard, Callegaus MWD	X			
David Fleisch, VC WWD No. 1 & 19	X			
John Menne, Zone MWC	X			
VACANT, Commercial				X
Rob Grether, West LPV Large Ag	X			
David Schwabauer, East LPV Large Ag	X			
Josh Waters, East LPV Small Ag				X
Richard Cavaletto, West LPV Small Ag	X			
Laurel Servin, East LPV MWC				X
Steven Murata, West LPV MWC	X			

Report of Bases for Majority and Minority Committee Member Positions:

The report conformed with previous discussions among the PAC regarding the GSP update.

PAC Recommendation Report Regarding the Draft Las Posas Valley Basin Five-Year Groundwater Sustainability Plan (GSP) Evaluation

On August 26, 2024, the Fox Canyon Groundwater Management Agency (FCGMA), serving in its capacity as the Las Posas Valley Basin Watermaster (Watermaster), sent a Committee Consultation request to the Las Posas Valley Policy Advisory Committee (PAC) regarding the Draft Las Posas Valley Basin – 5-Year Groundwater Sustainability Plan (GSP) Evaluation (Draft GSP Evaluation), entitled the First Periodic GSP Evaluation for the LPVB, as prepared by Dudek, the FCGMA’s consultant.

Overall, the document is well-done, and the PAC recognizes the significant effort put forth to prepare the Draft GSP Evaluation by the FCGMA and their consultant, Dudek. Together, they have evidently devoted substantial effort to organizing a comprehensive report assessing and documenting groundwater conditions and management strategies.

Following a thorough review, the PAC is submitting this Recommendation Report to provide recommendations for the Watermaster to consider before finalizing the Draft GSP Evaluation for submission to the California Department of Water Resources (DWR). While the PAC submits these recommendations to help improve the Draft GSP Evaluation for submission to DWR, we also recognize the critical role the Draft GSP Evaluation will have as a foundation for amendments to the GSP Update, the 2025 Basin Optimization Yield Study and the Basin Optimization Plan, all of which are key steps toward achieving long-term groundwater sustainability in the Las Posas Valley.

Following are the policy recommendations approved by the PAC on November 7, 2024.

I. MODELING AND DATA ACCURACY

Recommendation 1: Clearly Distinguish Between Model Predictions and Observed Data Throughout the Draft GSP Evaluation

Explicitly label both simulated (modeled) water levels and actual water level measurements in all figures, tables, and discussions. This distinction is crucial for evaluating the model's calibration and its reliability in predicting future groundwater conditions. Accurate calibration, informed by observed data, enhances the model's predictive accuracy.

Recommendation 2: Provide Documentation and Confidence Information for the UWCD Model Used in GSP Evaluation

The documentation for the UWCD model used in the Draft GSP Evaluation has not been made available, leading to reservations within the PAC regarding reliance on a model that has not undergone review by the Las Posas Valley Technical Advisory Committee (TAC). While models aim to replicate real-world conditions, they are inherently imperfect, and confidence in their findings is especially challenging given the limited number of wells (especially in the WLPMA) available for calibration. This limited data set raises concerns about the appropriate confidence interval for the

model results. The PAC recommends that the Draft GSP Evaluation include comprehensive information from the UWCD model, including documentation and details on confidence intervals, to address these concerns and improve transparency.

Recommendation 3: Address Deficiency in Monitoring Data Collection

A considerable portion of the monitoring data required by the GSP was not collected during the review period. This data is critical for evaluating the sustainability of the WLPMA and East Las Posas Management Area (ELPMA) and for ensuring compliance with the Judgment. The PAC recommends that the Draft GSP Evaluation clearly outline how the FCGMA plans to address this deficiency, detailing steps to promptly acquire the necessary monitoring data to support future updates and model runs.

II. CROSS-BASIN AND AREA INTERACTIONS

Recommendation 4: Clarify the Impact of West Las Posas Management Area (WLPMA) Pumping on Oxnard Subbasin Seawater Intrusion

The Draft GSP Evaluation should address the quantifiable relationship between WLPMA pumping and its incremental effect on seawater intrusion in the Oxnard Subbasin. This can be achieved by either including a detailed discussion of this relationship under various management scenarios or by outlining a process and timeline to conduct a focused assessment. Additionally, the PAC recommends that this topic be robustly addressed in the Basin Optimization Yield Study, utilizing the updated United Water Conservation District (UWCD) Coastal Plain Model.

Recommendation 5: Recharacterize Groundwater Underflows Between Oxnard Subbasin and WLPMA

The evaluation document should recharacterize groundwater underflows from the Oxnard subbasin to WLPMA, and reductions in underflow from WLPMA to Oxnard, which are currently labeled as “losses” of recharge to the Oxnard subbasin. This framing overlooks that many WLPMA extractors within the boundaries of UWCD have understood that the justification for significant extraction fees was for purported groundwater replenishment from the UWCD spreading grounds. Given this understanding of the interconnection between the basins, if the claimed underflows are occurring as stated, they should not simply be viewed as a loss for the Oxnard subbasin. As noted above, greater transparency of the modeling and better data would clarify this problem.

The Draft GSP Evaluation should amend its language to remove the characterization of these underflows as “losses” and instead acknowledge them as part of a balanced, cross-basin groundwater system. Additionally, it would be appropriate for the FCGMA to outline a process to periodically review and update minimum thresholds and measurable objectives on both sides of the boundary between the Las Posas Valley and Oxnard Basins. This approach would ensure an

accurate, equitable, and proportional understanding of recharge dynamics, benefiting the sustainability of both basins.

Recommendation 6: Provide Justification for Projected Increase in Simi Valley Inflows

The Draft GSP Evaluation's future baseline scenario projects nearly 2,000 acre-feet per year (AFY) more in Simi Valley inflows than recent flow levels. The PAC recommends that the Draft GSP Evaluation provide a detailed explanation for this anticipated increase, clarify, and provide supporting data and assumptions that justify this projection. Clear documentation of these projections will enhance stakeholder understanding of the expected inflows and their impact on the overall water management strategy.

III. MANAGEMENT AND PROJECT OVERSIGHT

Recommendation 7: Articulate a Clear Master Plan and Leadership for Advancing GSP Management Projects

The Draft GSP Evaluation outlines various management projects, however, there appears to be no overarching master plan to manage accountability and progress in advancing these projects, nor a designated leader responsible for their progression. Given that the 15-year timeline is relatively short for implementing some of the projects being considered, the PAC recommends that the Draft GSP Evaluation specify how the FCGMA intends to oversee and drive these initiatives. For instance, FCGMA could assign staff to engage periodically (e.g., quarterly) with each project proponent, tracking progress and providing regular updates to FCGMA and stakeholders on any advances or delays. Stakeholders have expressed a strong desire to be informed promptly if a project faces delays or challenges where stakeholder involvement could help mitigate issues, ensuring that the projects are effectively managed within the available timeframe.

Recommendation 8: Clarify the Impact of the Proposed Moorpark Desalter on Groundwater Supply, Recharge, and Water Balance

The PAC recommends that the Draft GSP Evaluation provide a comprehensive discussion of the anticipated effects of the proposed Moorpark desalter on groundwater supply, recharge, and the overall water balance in the ELPMA. Specifically:

- **Groundwater Supply and Recharge Interaction:** The Draft GSP Evaluation should explain how the desalter would influence groundwater extractions and recharge dynamics. If the desalter increases extractions without offsetting them through in-lieu deliveries, it could lead to lower water levels that may undermine sustainability efforts. However, these effects could be mitigated if the desalter's operations encourage dewatering in high groundwater areas near the arroyo, thereby inducing greater recharge, or if the product water is used to reduce extractions in other targeted Basin areas. The Draft GSP Evaluation should address

these factors generally and outline specific actions in the Basin Optimization Plan.

- **Net Impact on Water Balance:** The Draft GSP Evaluation presents conflicting statements about the desalter's effects, suggesting reductions in both groundwater pumping and reliance on imported water. This leaves ambiguity about the net effect on ELPMA's water balance. The Draft GSP Evaluation should clarify the desalter's anticipated impacts on groundwater pumping and imported water usage, with additional analysis in the Basin Optimization Plan to ensure alignment with long-term water balance and sustainability goals.

IV. STAKEHOLDER RESPONSIBILITIES AND TRANSPARENCY

Recommendation 9: Clarify Responsibility for Sustaining Groundwater Dependent Ecosystems (GDEs) along Arroyo Simi/Las Posas

The PAC recommends that the Draft GSP Evaluation clearly specify that groundwater users will not be held responsible for sustaining vegetation along Arroyo Simi/Las Posas, which is currently supported by inflows from Simi Valley wastewater discharge and dewatering wells. The Draft GSP Evaluation should explicitly state that any impact on vegetation due to reductions in these discharges should not be considered an undesirable result under SGMA in the GSP. Additionally, the PAC recommends that FCGMA establish long-term monitoring to track any potential changes in vegetation health related to GDEs. This ongoing monitoring will allow for a proactive approach to understanding and managing impacts without placing responsibility on groundwater users, thus preventing unintended obligations regarding GDE sustainability.

Recommendation 10: Refine and Clarify the Impact Analysis on Northern ELPMA Wells

The PAC recommends that the Draft GSP Evaluation provide greater clarity and consideration in the impact analysis for wells in the northern ELPMA, specifically regarding assumptions about well performance and the effects of minimum thresholds on all well owners.

- **Well Performance Assumptions:** The current analysis assumes wells will not experience significant effects until static groundwater levels reach the top of well screens and that partially desaturated screens can still support pumping. While this may be defensible, sustaining pumping at lower rates depends on appropriate pump placement below the adjusted water levels. The Draft GSP Evaluation should discuss the implications of these assumptions, including the key policy question of what constitutes "significant and unreasonable" impacts for this area, as these criteria influence FCGMA and Dudek's approach to the analysis.
- **Consideration of ASR Wells:** The analysis should also account for the effects on Aquifer Storage and Recovery (ASR) operations, as 10 out of the 22 wells in the evaluation area are Calleguas ASR wells (not solely agricultural wells, as Table 2-1 indicates). The Draft GSP Evaluation should provide an accurate representation of well types and address the

potential impact of minimum thresholds on ASR storage and recovery operations.

- **Impact of Minimum Thresholds on All Well Owners:** Finally, the PAC recommends that the Draft GSP Evaluation discuss how established minimum thresholds will impact all well owners in the area, ensuring a comprehensive understanding of threshold implications across different types of groundwater users.

Recommendation 11: Enhance Transparency and Accessibility in Sections and Tables 7.1 – 7.3

The PAC recommends that the following updates be made to improve transparency and ease of access for stakeholders regarding surcharge rates, fee adoption, compliance, and amendment terminology:

- **Table 7-1:** Update the table to provide details on how the Watermaster establishes extraction surcharge rates. At a minimum, add explanatory footnotes or references to relevant FCGMA Resolutions that outline the basis for these rates.
- **Section 7.1.3 – Funding:** Include footnotes, citations, or references that allow readers to locate documents where the FCGMA adopted specific fees, improving accessibility and clarity.
- **Section 7.2 – Enforcement and Legal Actions:** Provide references or links to each of the listed groundwater extractor responsibilities. This addition would support stakeholder compliance with FCGMA and Watermaster requirements by offering clear guidance on necessary steps.
- **Section 7.3 – Plan Amendments:** Clarify the distinctions between a “GSP amendment,” “this Update,” and “periodic GSP evaluation,” and specify whether the “amendment” planned for Quarter 1 of 2025 aligns with the GSP “evaluation” for submission to DWR.

These additions will improve stakeholder understanding of key processes, requirements, and terminology used within the document.

CONCLUSION

We respectfully submit the above policy-related recommendations for consideration by the FCGMA and Dudek. These recommendations reflect the PAC’s commitment to ensuring that the Draft GSP Evaluation is clear, precise, and thoroughly aligned with the objectives set forth in SGMA and the Judgment. We believe these actions will contribute meaningfully to the sustainable management of groundwater in the Las Posas Valley Basin. As stakeholders with a vested interest in the Basin’s long-term health, we look forward to continued collaboration with the FCGMA and Dudek to address these critical areas and to support a balanced, forward-thinking approach in the GSP Evaluation.