Las Posas Valley Groundwater Basin
Technical Advisory Committee Regular Meeting

Tuesday December 17, 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 December 17, 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 15, 2024 TAC Regular Meeting** (attached)

2. **Committee Consultation– Draft Basin Optimization Yield Plan**

   Watermaster staff requested TAC consultation on the Draft Basin Optimization Yield Plan (DBOYP) for the Las Posas Valley Basin (LPVB) (attached). The amended Watermaster Rules provide the committees with a review period of 63 days from date of receipt of the DBOYP. TAC comments on the DBOYP, in the form of a Recommendation Report, would therefore be due to the Watermaster no later than February 13, 2025.

   The TAC will discuss the DBOYP and develop a review and comment plan and schedule in consideration of the draft, the available review period, and upcoming regular TAC meetings.

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

   The Watermaster prepared a Response Report replying to the TAC Recommendation Report on the draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation. The Response Report was presented to the Watermaster Board on December 13, 2024 and is attached to this agenda. The TAC will discuss the response report and Watermaster responses to individual TAC comments on the draft 5-year GSP Evaluation

4. 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 Basin Optimization Plan	12/9/24	1/13/25
Revised / Amended Groundwater Sustainability Plan	January 2025	TBD
Calleguas ASR Project Operations Plan	TBD	TBD

5. 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 15, 2024 TAC Regular Meeting

Las Posas Valley Groundwater Basin
Technical Advisory Committee Regular Meeting

Meeting Minutes
for
October 15, 2024

A. Call to Order

Chad Taylor, Chair of the Technical Advisory Committee (TAC) called the meeting to order at 2:02 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 all three voting members present.

C. Agenda Review

Chair Taylor noted that the agenda for the meeting was published by the Watermaster and asked if TAC members had comments or requests for additional items for the agenda. No additional items were raised by TAC members offered no discussion of the agenda, and no additional items were identified.

Mr. Taylor asked for public comments or requests for additional items on the agenda and none were raised.

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

Mr. Taylor offered an opportunity for TAC members to provide comments on items not on the agenda. No discussion of additional items was provided.

F. Regular Agenda

1. Approve the Minutes of the October 2, 2024 Special Meeting

Chad asked the TAC members for discussion and/or comments on the draft minutes for the October 2, 2024 special TAC meeting. No comments were received.

MOTION: Chair Taylor moved to approve the October 2, 2024 TAC Meeting minutes
SECOND: Chad Taylor
VOTE: Unanimously approved

2. **Recommendation Report– Revised Draft Scope of Work to Prepare the Las Posas Valley Basin 2025 Basin Optimization Yield Study**

Mr. Taylor reminded the TAC that the revised draft scope of work to prepare the Las Posas Valley Basin 2025 Basin Optimization Yield Study was discussed in the October 2, 2024 special meeting, and the TAC authorized the Administrator to prepare and send a Recommendation Report to the Watermaster at that time. The Administrator prepared the Recommendation Report and submitted it to the Watermaster on October 4, 2024. A copy of that Recommendation Report was included in the meeting agenda packet.

Mr. Taylor offered an opportunity for TAC members to comment on the Recommendation Report to the TAC and public. No comments were made.

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

Chair Taylor advanced to discussion of the draft Recommendation Report presenting TAC comments and recommendations for the draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation. Mr. Taylor reminded meeting attendees that the draft Recommendation Report, which was included in the agenda packet, 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.

Mr. Taylor asked for TAC member comments or edits to the draft Recommendation Report. Mr. Abrams and Mr. Morgan both expressed appreciation for the organization of the recommendations and detailed comments but had no comments on the draft Recommendation Report.

Mr. Taylor asked for public comments, and none were provided.

The TAC voted to approve the Recommendation Report as drafted and authorize the TAC Administrator to submit the report to the Watermaster.

> **MOTION:** Chair Taylor moved to approve the TAC Recommendation Report for the draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation and authorize the TAC Administrator to submit the report to the Watermaster
> **SECOND:** Vice Chair Morgan
> **VOTE:** Unanimously approved

4. **Watermaster Response Reports**

Mr. Taylor reported to the TAC that the Watermaster has prepared Response Reports replying to TAC Recommendation Reports for Basin Optimization Plan Tasks 1 and 2 and the Draft Scope of Work and Budget to Prepare the LPVB 2025 Basin Optimization Yield Study. These Response Reports were presented to the Watermaster in Board meetings and were attached to the TAC meeting agenda. He also reported to have requested copies or notification of future response reports be forwarded to the TAC Administrator for distribution to the TAC and discussion in TAC meetings.

Mr. Taylor asked for TAC member comments on the two response reports. None were received.

Mr. Taylor also asked for public comment on this topic, and none were received.

5. Update on Committee Consultation Review Schedule

The TAC reviewed the table with expected dates for upcoming committee consultation requests and Mr. Taylor asked Mr. Loeb to provide feedback and additional information.

Mr. Loeb indicated that no consultation requests other than those shown on the agenda are expected through the end of 2024 and into January of 2025.

Mr. Bondy noted that the Calleguas ASR Study Group has not yet been formed and no estimate of formation date was available.

G. Items for Future Agendas

Chair Taylor asked TAC members if there were any items for future TAC meeting agenda they wished to bring before the TAC. Mr. Bondy reminded the TAC that he was willing to provide a hydrogeology of the Las Posas Basin tour for TAC members. Mr. Taylor noted that Watermaster legal counsel advised him that having multiple TAC members participate simultaneously was not consistent with the Brown Act, but individual members could attend one at a time, and the Watermaster may wish to have a representative join the tour. No other items for future agendas were raised by the TAC.

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

H. **Adjourn**

Mr. Abrams made a motion to adjourn the meeting and the meeting ended at 2:23 PM.

MOTION: Mr. Abrams moved to adjourn
SECOND: Vice Chair Tony Morgan
VOTE: Unanimously approved

Attachment 2

Committee Consultation Request – Draft Basin Optimization Yield Plan

FOX CANYON GROUNDWATER MANAGEMENT AGENCY
LAS POSAS VALLEY WATERMASTER

MEMORANDUM

Date: December 12, 2024

To: Las Posas Valley Technical Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

RE: Draft Basin Optimization Yield Plan

Dear Las Posas Valley Technical Advisory Committee (TAC):

As the Watermaster for the Las Posas Valley Basin (LPVB), Fox Canyon Groundwater Management Agency (FCGMA) is responsible for preparing the Basin Optimization Plan for the LPVB. The Judgement in *Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency VENCI00509700* (Judgement) requires LPVB committee consultation during development of the Basin Optimization Plan. (Judgment, §§4.10 and 5.3) In compliance with the judgment, Watermaster refers the draft Basin Optimization Plan to your committee for consultation.

The amended Watermaster Rules give your committee 63 days from date of receipt of the draft Optimization Plan to submit Recommendation Reports to Watermaster. Please provide feedback to Watermaster by February 13, 2025, in accordance with the amended Watermaster Rules.

Please contact me at (805) 654-2010 or LPV.Watermaster@ventura.org with any questions or concerns.

DRAFT Initial

Las Posas Valley Basin Optimization Plan

DECEMBER 2024

Prepared for:

FOX CANYON GROUNDWATER MANAGEMENT AGENCY
LAS POSAS VALLEY BASIN WATERMASTER
800 South Victoria Avenue
Ventura, California 93009-1610
Contact: Farai Kaseke, PhD, PH, PMP, CSM

Prepared by:

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Encinitas, California 92024

Printed on 30% post-consumer recycled material.

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TABLES

APPENDICES

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AF	Acre-Feet
AFY	Acre-Feet per Year
ASR	Aquifer Storage and Recovery
CPI	Consumer Price Index
City	City of Simi Valley
CMWD	Calleguas Municipal Water District
ELPMA	East Las Posas Management Area
FCGMA	Fox Canyon Groundwater Management Agency
Judgment	Judgment in Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700
LPV	Las Posas Valley Groundwater Basin (DWR Basin No. 4-008)
MWC	Mutual Water Company
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
PAC	Policy Advisory Committee
RWQCB	Regional Water Quality Control Board
SGMA	Sustainable Groundwater Management Act
SVWQCP	Simi Valley Water Quality Control Plant
TAC	Technical Advisory Committee
TDS	Total Dissolved Solids
TMDL	Total Maximum Daily Load
VCWWD-1	Ventura County Waterworks District No. 1
VCWWD-19	Ventura County Waterworks District No. 19
WLPMA	West Las Posas Management Area

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1 Introduction

1.1 LPV Judgment

On July 10, 2023, the Santa Barbara Superior Court issued a statement of decision adopting a judgment in Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700 (Judgment). The Judgment adjudicates all groundwater rights in the Las Posas Valley Groundwater Basin (LPV) and provides for the LPV's sustainable management pursuant to the Sustainable Groundwater Management Act (SGMA). The Judgment appoints Fox Canyon Groundwater Management Agency (FCGMA) as the Watermaster to implement and administer the Judgment.

As outlined in the Judgment, FCGMA, in consultation with the LPV Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC), is responsible for developing a Basin Optimization Plan for the LPV. The Basin Optimization Plan is designed to identify, evaluate, and prioritize projects that are "practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 [acre-feet per year] AFY or as close thereto as achievable" (Judgment §5.3).[1] Consistent with this objective, the Basin Optimization Plan is required to include:

- Criteria for determining the priority and feasibility of each Basin Optimization Project;
- A description of Basin Optimization Projects;
- An analysis of whether any of the Basin Optimization Projects (i) are consistent with SGMA and the achievement of Sustainable Groundwater Management, and (ii) will prevent or alleviate, or cause or exacerbate, Undesirable Results or Material Injury;
- A prioritization schedule of the Basin Optimization Projects to be implemented;
- A schedule for the Basin Optimization Projects which are to be evaluated, scoped, designed, financed, or developed; and
- A five-year budget for the costs of capital improvements, and operation and maintenance (O&M), of the Basin Optimization projects.

Projects included in this plan have been identified by FCGMA and stakeholders via the Judgment, the LPV Groundwater Sustainability Plan (GSP), and the 2025 Periodic Evaluation of the LPV GSP. These projects are summarized below (Section 1.2, Summary of Projects Evaluated). Sections 2 through 5 present the project evaluations, schedule for implementation, and estimated capital and O&M costs through December 31, 2029, respectively.

[1] The cumulative amount of Allocated Groundwater that may be sustainably Extracted from the Basin for Use in any particular Water Year under the terms of this Judgment, excluding the Use of any Groundwater pursuant to the right of Carryover. Consistent with the definition of "Total Safe Yield" in the Phase 1 Order, the components of the Operating Yield include all native and non-native sources of water within the Basin, or within either subbasin (as the context requires), presently and in the future, including native Groundwater, surface water underflow, Return Flows from the use of imported water within the Basin, recharge from treated wastewater, recharge from septic systems, storm water recharge (intentional or otherwise), recharge from natural and non-natural sources originating inside or outside the Basin, excepting augmented yield physically existing within, and recoverable from, the Basin as a result of the Calleguas ASR Project, if any.

1.2 Summary of Projects Evaluated

A total of 10 projects are evaluated in the Basin Optimization Plan (Table 1). All 10 projects identified in the Basin Optimization Plan are designed to:

- Increase the sustainable yield of the LPV;
- Provide a new source of water supply to the LPV;
- Improve water quality management of the LPV; and/or
- Address data gaps identified in the GSP and 2025 Periodic Evaluation of the LPV GSP.

Table 1. Summary of Projects Evaluated

Project No.	Project Title	Description	Water Supply / Yield Augmentation	Project Proponent	Source(s)
1	Arroyo-Simi Las Posas Arundo Removal	Arundo donax removal, and periodic maintenance, from Arroyo Simi-Las Posas corridor	Up to 2,680 AFY	FCGMA	Judgment No. 1 (§ 5.4.1) GSP Project No. 2 GSP Evaluation Project No. 2
2	Purchase of Imported Water from CMWD for Basin Replenishment[a]	Purchase of 1,760 AFY of imported water from CMWD for delivery to Zone MWC and / or VCWWD-19 in lieu of groundwater extraction	1,760 AFY	FCGMA	Judgment Nos. 1&2 (§§ 5.4.2 & 5.4.9) GSP Project No. 1 GSP Evaluation Project No. 1
3	Arroyo Las Posas Storm Water Capture and Recharge	Storm water capture and recharge at existing Moorpark Water Treatment Plant percolation ponds to increase recharge to the ELPMA	Up to 2,000 AFY	VCWWD-1	Judgment No. 3 (§ 5.4.3) GSP Evaluation No. 6
4	Moorpark Desalter	Construction of a desalter well field, conveyance infrastructure, and treatment system to manage water quality and increase recharge in southern ELPMA	Up to 2,200 AFY	VCWWD-1	Judgment No. 4 (§ 5.4.4) GSP Evaluation Project No. 5
5	Arroyo Simi-Las Posas Water Acquisition	Formalize an agreement between FCGMA and the City of Simi Valley to maintain discharges from SVWQCP to Arroyo Simi-Las Posas to maintain recharge to the ELPMA	Up to 4,700 AFY	FCGMA	Judgment No. 5 (§ 5.4.5) GSP Project No. 3 GSP Evaluation Project No. 3
6	Delivery of Recycled Water to Las Posas Valley Users via Pipeline	Construction of conveyance infrastructure, and development of agreements, to deliver SVWQCP recycled water to Las Posas Valley users via pipeline	Up to 3,000 AFY	FCGMA	Judgment No. 6 (§ 5.4.6)
7	In Lieu Deliveries to Northern East Las Posas Management Area Feasibility Study	Study to evaluate the feasibility of providing supplemental water supplies to the northern area of the ELPMA	Unknown	FCGMA	Judgment No. 7 (§ 5.4.7) GSP Evaluation Project No. 9
8	Developing a Least Cost Acquisition Program	Study to develop a program for the least cost acquisition of Allocation Basis or Annual Allocations, or Carryover	Unknown	FCGMA	Judgment No. 8 (§ 5.4.8)
9	Construction of additional dedicated groundwater monitoring wells	Construction of up to four (4) nested monitoring wells to address spatial data gaps in groundwater elevation monitoring the LPV	Not Applicable	FCGMA	GSP Evaluation Project No. 7
10	Installation of transducers in groundwater monitoring Wells	Installation of up to 11 pressure transducers to address temporal data gaps in groundwater elevation monitoring in the LPV	Not Applicable	FCGMA	GSP Evaluation Project No. 8

Notes: Projects are not in order of prioritization. FCGMA = Fox Canyon Groundwater Management Agency; VCWWD-1 = Ventura County Waterwork District No. 1; AFY = Acre-Feet per Year.

[a] Projects identified in Judgement sections 5.4.2 and 5.4.9 were combined based on TAC recommendation (TAC, August 27, 2024).

2 Project Evaluation and Prioritization

2.1 Project Evaluation Criteria

FCGMA, in consultation with the LPV PAC and TAC, developed the following criteria to evaluate and prioritize projects that are "practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable" (Judgment §5.3). These criteria are divided into four categories: water supply / yield augmentation, timing and feasibility, cost and funding, and additional project considerations. FCGMA has assigned scores to each project evaluation category such that water supply / yield augmentation, timing and feasibility, and cost and funding are equally weighted, and the additional project considerations hold lesser weight in evaluating the project's benefits and feasibility for implementation. Projects are prioritized by total project score.

These project evaluation criteria were designed to evaluate and rank the benefits of water-supply projects. As a result, feasibility studies and data-gap projects tend to rank lower than projects that are well defined and readily implementable. Because FCGMA recognizes the importance of feasibility studies and data-gap projects, these projects are ranked and prioritized independently from the water supply projects (Section 4).

Draft project evaluation criteria were submitted to the LPV PAC for consultation on April 4, 2024 and to the LPV TAC for consultation on July 10, 2024. TAC prepared an August 27, 2024, recommendation report and Watermaster prepared a September 19, 2024, response report, which was accepted by the Watermaster Board on September 25, 2024.[2] The project evaluation criteria used for this Plan are summarized below and included in Appendix A.

2.1.1 Water Supply

This category is defined to establish the estimated project benefits to the LPV through an increase in the sustainable yield, increase in the availability of supplemental water for use in lieu of groundwater, or a reduction in groundwater demand. Project benefits are scored based on:

1. The annual volume of increased sustainable yield, available supplemental water, or reduced groundwater demand provided by the project (maximum of 25 points).
2. The documentation provided to support the estimated quantification (maximum of 25 points).

A maximum of 50 points can be assigned to each project under the Water Supply category.

2.1.2 Timing and Feasibility

Under the Judgment and SGMA, the LPV is mandated to achieve Sustainable Groundwater Management by 2040. This category addresses the timing and uncertainty of the project and evaluates the likelihood of a project's ability to be implemented and operational prior to 2040. Timing and feasibility are scored based on seven components:

1. Project implementation timeframe (maximum of 20 points)
2. Current stage of project development (maximum of 5 points)

[2] FCGMA / Watermaster Board meeting agenda packages and meeting minutes are available at www.fcgma.org.

3. Status of approvals, permits, and environmental compliance (maximum of 5 points)
4. Project complexity (maximum of 5 points)
5. Status of, and requirements for, land acquisition or easements (maximum of 5 points)
6. Dependency on other unbuilt or unfunded projects (maximum of 5 points)
7. Project lifespan (maximum of 5 points)

A maximum of 50 points can be assigned to each project under the Timing / Feasibility category.

2.1.3 Cost and Funding

This category evaluates the cost / benefit of the project and the amount of capital and operations and maintenance (O&M) of non-FCGMA funding that is committed to the project. The cost and funding category is scored based on three separate components:

8. Total project cost per acre-foot (AF) of water generated or saved (maximum of 20 points)
9. Funding match for project construction (maximum of 15 points)
10. Funding match for O&M (maximum of 15 points)

A maximum of 50 points can be assigned to each project under the Cost and Funding category.

2.1.4 Additional Project Considerations

This category evaluates whether the Basin Optimization Projects (i) are consistent with SGMA and the achievement of Sustainable Groundwater Management, and (ii) will prevent or alleviate, or cause or exacerbate, Undesirable Results[3] or Material Injury[4]. This assessment is based on the relationship between project implementation and the sustainability indicators defined in SGMA that are applicable to the LPV. These include benefits relative to chronic lowering of groundwater levels, reduction of groundwater in storage, degraded water quality, land subsidence, and depletion of interconnected surface water. A total of 20 points can be assigned based on the number of sustainability indicators addressed by the project.

[3] Undesirable Result(s) is defined in Judgment section 1.108: As defined in Water Code section 10721(x), one or more of the following effects caused by Groundwater conditions occurring throughout the Basin: (1) Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the planning and implementation horizon. Overdraft during a period of drought is not sufficient to establish a chronic lowering of groundwater levels if extractions and groundwater recharge are managed as necessary to ensure that reductions in groundwater levels or storage during a period of drought are offset by increases in groundwater levels or storage during other periods. (2) Significant and unreasonable reduction of groundwater storage. (3) Significant and unreasonable seawater intrusion. (4) Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies. (5) Significant and unreasonable land subsidence that substantially interferes with surface land uses. (6) Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water.

[4] Material Injury is defined in Judgment section 1.64: A material and unreasonable impact to the Basin, any Management Area, Water Rights Holder, Party, well or water supply caused by the Extraction, storage, or Transfer of Groundwater in the Basin. Material Injury does not include economic injury that results from other than direct physical causes, including any adverse effect on water rates, lease rates, or demand for water. If fully mitigated, Material Injury shall no longer be considered to be occurring. Topics that may be considered in an analysis for a Material Injury determination include the following: (i) groundwater levels; (ii) groundwater in storage; (iii) groundwater quality; (iv) land subsidence; (v) natural recharge; and (vi) minimum thresholds and measurable objectives as set forth in SGMA and implementing regulations.

Additionally, this category is used identify whether the collaboration, cooperation, or participation of the FCGMA, Calleguas Municipal Water District (CMWD), WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for implementation of the Basin Optimization Project.

2.2 Project Evaluations

2.2.1 Project 1: Arroyo Simi-Las Posas Arundo Removal

The Arroyo Simi–Las Posas Arundo Removal Project involves removal of the invasive plant species Arundo donax from approximately 324 acres of land along the Arroyo Simi-Las Posas corridor. Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015). If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015). This project is anticipated to increase groundwater recharge to the ELPMA and improve the health of riparian habitat along Arroyo Simi-Las Posas.

This project was proposed for inclusion in the GSP in 2018 and requires an update to assess the current location, extent, and density of Arundo in the Arroyo Simi-Las Posas corridor. Because of this, this project would be implemented in two phases.

Phase I would cover project implementation planning activities and consist of the following tasks:

- The examination of the originally proposed project area and comparison to the current state/condition of the removal areas,
- Identification of landowners within the project area,
- Establishment of access agreements with landowners,
- Reassessment of project area and evaluation of invasive vegetation extent,
- Preparation of a removal project workplan, and
- Environmental permit and compliance coordination.

This planning step is essential for evaluating removal-restoration labor and material costs, permitting requirements/restrictions, private property access agreements, restoration needs and ongoing maintenance.

Phase II would involve field work to remove Arundo from the Arroyo Simi-Las Posas Corridor. The full scope of work and project costs for this project phase will be developed in Phase I of the project. Giant reed removal activities performed by various local interests (e.g., Ventura County Public Works Agency, various developers, Rancho Simi Recreation and Parks District, and others) are ongoing in the Arroyo Simi and can serve as a model for the removal of invasive vegetation downstream as the Arroyo Simi transitions to the Arroyo Las Posas, within the Las Posas Valley Basin.

This project is consistent with the project in the Judgment titled *Removing, and periodic removal maintenance of Arundo donax from the Las Posas Valley watershed in an environmentally safe manner* (Judgment §5.4.1).

2.2.1.1 Water Supply

Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY (VCWSD 2015). This is based on the estimated reduction in evapotranspiration demands associated with the project, or portion of which would occur upstream of the LPV (VCWSD 2015). Additional modeling is required to characterize the volume of water that would recharge the ELPMA.

2.2.1.2 Timing and Feasibility

Project Phasing and Timing

This project consists of two phases to support project planning, permitting, and coordination with landowners (Phase I) and project implementation (Phase II). This project is informed by a feasibility study, initially prepared in 2015, that requires updating through additional field and desktop activities to re-evaluate the Arundo removal locations, water saving estimates, and maintenance recommendations. FCGMA estimates that implementation of both project phases could be completed within four years of project initiation.

Environmental and Permitting

This project is in the planning phase and specific permitting and CEQA requirements will be identified in Phase I of project implementation.

Project Complexity

This project relies on existing technology and similar projects have been implemented across the Ventura Watershed by various local interests (e.g., Ventura County Public Works Agency, various developers, Rancho Simi Recreation and Parks District, and others). FCGMA anticipates the need to coordinate with landowners along Arroyo Simi-Las Posas for access agreements to perform field activities, including initial Arundo mapping, Arundo removal, and Arundo removal maintenance.

While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to increase available storage in the ELPMA and limit discharge of the increased arroyo flows downstream into the Pleasant Valley Basin.

Anticipated Project Lifespan

FCGMA anticipates that the project lifespan could exceed 25 years.

2.2.1.3 Cost and Funding

FCGMA estimates that the cost to implement Phase I of this project would be approximately $400,000. This includes costs to: (i) perform the initial field investigation / identification of Arundo removal locations, (ii) negotiate easements with landowners, (iii) identify CEQA and permitting requirements, and (iv) develop an Arundo removal and maintenance work plan.

Capital and O&M costs for Phase II of this project were estimated by The Nature Conservancy in 2018 to support GSP development (FCGMA 2019). Adjusting The Nature Conservancy's cost estimates by the increase in Consumer Price Index (CPI) between 2020 and 2024 leads to a capital cost estimate for Phase II of $9,100,00 and an O&M cost of $250 per acre-foot (AF) of water.[5]

Assuming a 25-year project lifespan and that the project will increase recharge to the ELPMA by 2,680 AFY, the total cost to implement this project is estimated to be approximately $390 per AF. No outside funding sources have been identified for this project.

2.2.1.4 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

Within the ELPMA, Arundo is estimated to consume approximately 1,900 AFY more than native riparian species. This is approximately 11% of the estimated 17,800 AFY sustainable yield of the ELPMA. By increasing surface water flow in the Arroyo Simi–Las Posas and decreasing ET losses from invasive species within the ELPMA, this project is projected to increase recharge along Arroyo Simi–Las Posas. The increased recharge will directly impact the water levels and groundwater in storage to provide increased flexibility in basin management to maintain groundwater levels above minimum thresholds and at the measurable objectives.

Implementation of this project is anticipated to support groundwater level and storage management within the ELPMA and is consistent with Sustainable Groundwater Management in the LPV. Implementation of this project is not anticipated to cause Undesirable Results and/or result in Material Injury that cannot be mitigated.

Collaboration Requirements

Implementation of this project will require coordination with landowners in the LPV to develop access agreements for Arundo mapping, removal, and O&M.

2.2.2 Project 2: Purchase of Imported Water from CMWD for Basin Replenishment

The Purchase of Imported Water from CMWD for Basin Replenishment project would supply imported water to the eastern part of the WLPMA in lieu of groundwater production (FCGMA 2019). This project would result in decreased groundwater production from water in the area of a groundwater depression in the WLPMA, would rely on existing delivery infrastructure, and would be limited to water purveyors with the ability to receive water from CMWD (FCGMA 2019).

Based on TAC recommendation, this project combines the two projects in the Judgment titled, *Importing of surplus water* and *Using Calleguas Facilities for Replenishment* (Judgment §5.4.2 and 5.4.9).

[5] https://www.bls.gov/data/inflation_calculator.htm

2.2.2.1 Water Supply

During development of the GSP, FCGMA coordinated with CMWD, Zone MWC, and VCWWD-19, to estimate the volume of imported water that may be available to water purveyors within the WLPMA in CMWD's service area. In 2019, it was estimated that 1,762 AFY of CMWD water would be available for purchase and delivery to Zone MWC and VCWWD-19. CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA. FCGMA used these projections for analysis of the project for this Plan.

2.2.2.2 Timing and Feasibility

Project Phasing and Timing

This project would reinitiate a Metropolitan Water District of Southern California incentivized program implemented by CMWD that was operational in the WLPMA between 1995 and 2008. Because this project will rely on existing infrastructure, it is anticipated that this project would consist of a single phase and could be implemented following the development of project policy by the Watermaster Board, establishment of funds, and an agreement to purchase water from CMWD.

Environmental and Permitting

Because this project will utilize existing infrastructure, no additional permitting or CEQA compliance is required to implement this project.

Project Complexity

This project relies on existing infrastructure and would re-establish a program that was operational between 1998 and 2005. Initiation and operation of this project is not technically complex and does not dependent on other unbuilt projects.

Anticipated Project Lifespan

During development of the GSP, CMWD indicated that this project lifespan could exceed 50 years.

2.2.2.3 Cost and Funding

The cost to implement this project is driven by CMWD's water rates. CMWD's 2024 Tier 1 water rate is $1,730 per AF[6]. This cost includes O&M to maintain CMWD's conveyance infrastructure. The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping.

[6] https://www.calleguas.com/images/docs-financial/water_rates_2024.pdf

2.2.2.4 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

Implementation of this project would reduce groundwater production from the pumping depression located in the eastern portion of the WLPMA and assist with water-level recovery. Between 1995 and 2008, groundwater elevations in the eastern part of the WLPMA recovered by as much as 80 feet in response to in lieu deliveries from CMWD. These measured groundwater elevation recoveries demonstrate the efficacy of this project in managing groundwater levels in the LPV (FCGMA 2019). Implementation of this project is not anticipated to cause Undesirable Results and/or result in Material Injury that cannot be mitigated.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA, CMWD, VCWWD-19, and Zone MWC.

2.2.3 Project 3: Arroyo Las Posas storm water capture and recharge

The Arroyo Las Posas storm water capture and recharge project proposes to divert storm flows from Arroyo Simi-Las Posas for recharge to the ELPMA. The proposed diversions would occur during high flow events via a new surface intake located near the existing stabilizer structure in the Arroyo Simi-Las Posas adjacent to the Moorpark Water Reclamation Facility operated by VCWWD-1. The storm flows would then be delivered to the existing 40-acres of percolation ponds to recharge the aquifers in the ELPMA.

This project is consistent with the project in the Judgment titled *Arroyo Las Posas storm water capture and recharge* (Judgment §5.4.3).

2.2.3.1 Water Supply

VCWWD-1 has undertaken significant efforts to advance this project. These include geophysical surveys to characterize their existing percolation ponds and estimate infiltration rates, and hydrologic modeling to estimate the volume of storm flows that would be available for diversion. Their hydrologic modeling studies suggest that implementation of this project could provide up to 2,000 AFY of diversions to their percolation ponds (VCWWD-1, 2020). No groundwater modeling has been conducted to characterize the storage capacity of the Shallow Alluvial Aquifer, which underlies the existing percolation ponds, and the volume of recharged water that would remain in the ELPMA.

2.2.3.2 Timing and Feasibility

Project Phasing and Timing

VCWWD-1 is conducting a feasibility study for this project, which they anticipate completing by March 30, 2025. VCWWD-1 anticipates that construction of the diversion facilities could be completed in a single phase by June 30, 2027. FCGMA recommends that modeling be conducted prior to project construction to characterize the volume of recharged water that would remain in the ELPMA. This modeling should include assumptions that are consistent with the GSP and incorporate findings from VCWWD-1 existing studies, including, but not limited to: (i) existing

infiltration pond capacity, (ii) estimated infiltration rates (Ulrich et. al, Not Dated), and (iii) the volume of stormflows available for diversion (VCWWD-1, 2020).

Environmental and Permitting

VCWWD-1 anticipates that project implementation will require CEQA and NEPA compliance, with additional permitting and coordination with the California Department of Fish and Wildlife, Regional Water Quality Control Board, Army Corps of Engineers, and VCWPD. Permitting and CEQA/NEPA compliance has not started.

No access agreements or land acquisition is required to implement this project.

Project Complexity

While this project will rely on existing technology, the project is considered moderately complex and will require the construction of diversion facilities, including the construction of pipeline, pumping stations, a fish ladder, and improvements (as necessary) to VCWWD-1's existing percolation ponds. Permitting and design of the fish ladder will be better defined prior to project construction and implementation. Additionally, while this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to provide adequate available storage to realize the full benefits of recharge to the ELPMA.

Anticipated Project Lifespan

VCWWD-1 anticipates that this project lifespan could exceed 25 years.

2.2.3.3 Cost and Funding

VCWWD-1 estimates that the capital cost to construct this project is approximately $4,000,000. O&M costs have not been estimated. No outside sources of funding to construct this project have been identified.

2.2.3.4 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

Implementation of this project is anticipated to support groundwater level and storage management within the ELPMA and is consistent with Sustainable Groundwater Management in the LPV. Implementation of this project is not anticipated to cause Undesirable Results and/or result in Material Injury that cannot be mitigated.

Providing additional recharge to the ELPMA will directly impact groundwater levels, which are used to characterize the potential onset of undesirable results associated with the four sustainability indicators applicable to the LPV, by providing additional water supplies to the LPV. The implementation of this project would aid in maintaining groundwater elevations above the minimum thresholds throughout the ELPMA.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA and VCWWD-1.

2.2.4 Project 4: Moorpark Desalter

The Moorpark Desalter project consists of a new groundwater desalter facility located east of the Moorpark Water Reclamation Facility, along Los Angeles Avenue. The project goals are to improve water quality in the southern portion of the ELPMA and provide an additional source of potable water supply to the LPV. The project aims to achieve these goals by pumping and treating high-TDS groundwater from the southern portion of the ELPMA. In doing this, the project would: (1) reduce the dependence on imported water in the LPV by providing new local potable supplies, (2) improve groundwater quality in the southern portion of the ELPMA, and (3) create additional groundwater storage within the ELPMA.

This Project will include: (1) construction of new groundwater extraction wells to pump high-TDS groundwater from the ELPMA, and (2) construction of a desalter facility that would treat the low-quality groundwater prior to incorporation into the VCWWD-1 delivery system. Additionally, this project may require construction of additional pipeline to connect the desalter's brine disposal system to CMWD's Salinity Management Pipeline, which discharges brine from various desalters and water treatment plants to the Pacific Ocean. Preliminary analyses for the proposed desalter have been completed and the project is in the planning phase.

This project is consistent with the project in the Judgment titled *Constructing desalter(s) to address water quality issues in Arroyo Simi Creek* (Judgment §5.4.4).

2.2.4.1 Water Supply

VCWWD-1 has conducted preliminary numerical groundwater flow modeling to evaluate project feasibility. Their groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA. Based on this, it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY. Additional modeling is required to evaluate the effects of the proposed desalter under scenarios that are consistent with those evaluated in the GSP and Basin Optimization Yield study.

2.2.4.2 Timing and Feasibility

Project Phasing and Timing

VCWWD-1 has not completed a feasibility study for this project. Because of this, project phasing and timing are not well defined.

Environmental and Permitting

VCWWD-1 anticipates that project implementation will require CEQA and NEPA compliance, but the specific permitting and regulatory requirements to construct and operate the project are not well defined. Additionally, easement or land acquisition requirements to implement this project are not well defined.

Permitting, environmental compliance, and land acquisitions would be identified through an initial feasibility study.

Project Complexity

While this project will not rely on new technology, the project is considered moderately complex and will require the construction of a desalter well field, treatment system, and conveyance infrastructure. This project is not dependent

on other unbuilt projects or projects that are currently under construction, however, implementation of this project could provide additional benefits to projects that increase and/or maintain flows in Arroyo Simi-Las Posas by creating additional storage capacity within the Shallow Alluvial Aquifer. VCWWD-1 may need to develop an agreement with CMWD to dispose of brine produced at the desalter via CMWD's Salinity Management Pipeline.

Anticipated Project Lifespan

VCWWD-1 anticipates that this project lifespan could exceed 25 years.

2.2.4.3 Cost and Funding

VCWWD-1 estimates that the capital costs to construct this project are approximately $40,000,000 but has not estimated costs to maintain the facilities. No outside sources of funding to construct this project have been identified.

2.2.4.4 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

Implementation of this project is anticipated to improve groundwater quality by removing constituents of concern from the southern portion of the ELPMA, which has been impacted by degraded water quality resulting from surface water recharge originating from outside the LPV boundaries. The project aims to achieve these goals by pumping and treating high-TDS groundwater from southern portion of the ELPMA. In doing this, the project would: (1) reduce the dependence on imported water in the LPV by providing new local potable supplies, (2) improve groundwater quality in the southern portion of the ELPMA, and (3) create additional underground storage within the ELPMA

Providing additional recharge to the ELPMA will directly impact groundwater levels, which are used to characterize the potential onset of undesirable results associated with the four sustainability indicators applicable to the LPV. Groundwater elevation minimum thresholds were established at 15 wells to characterize the potential onset of undesirable results associated with the four sustainability indicators applicable to the LPV. The impact of this project on groundwater elevations and their relation to minimum thresholds will be evaluated as project planning progresses. Depending on the operational conditions and distribution of desalted water, this project.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA,VCWWD-1, and CMWD.

2.2.5 Project 5: Arroyo Simi-Las Posas Water Acquisition

The Arroyo Simi–Las Posas Water Acquisition project would involve the purchase of recycled water from the City of Simi Valley (City) (FCGMA 2019). In return, the City would commit to continuing to discharge the purchased or leased water from its shallow dewatering wells and/or the Simi Valley Water Quality Control Plant (SVWQCP) to the Arroyo Simi–Las Posas for downstream recharge to the LPV. The City has indicated that 3,000 AFY of recycled water from the SVWQCP would be available and 1,700 AFY would be available from the dewatering wells (FCGMA 2019). However, due to the riparian use of the water along the Arroyo Simi–Las Posas, an estimated 1,000 to 2,500 AFY of the water may be lost due to plant uptake and evaporation, leaving 2,200 to 3,700 AFY available as surface flow and recharge to the ELPMA.

This project is consistent with the project in the Judgment titled *Formalizing an agreement with the City of Simi Valley ("City") to maintain up-stream wastewater treatment plant discharges, or treated effluent, into Arroyo Simi Creek, which shall include cooperation with and support of the City, as necessary, in its interactions with the Los Angeles Regional Water Quality Control Board ("LA Waterboard") on this issue of treated effluent discharge into Arroyo Simi Creek* (Judgment §5.4.5).

2.2.5.1 Water Supply

The 2025 Periodic Evaluation of the GSP evaluated the benefits of maintaining SVWQCP discharges to Arroyo Simi-Las Posas. Results from the modeling suggest that implementation of this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY.

2.2.5.2 Timing and Feasibility

Project Phasing and Timing

The project will rely on existing infrastructure and will require negotiation of real property (i.e., recycled water) pricing and availability. These negotiations have not started, and the final agreed upon terms are uncertain. While the project could be implemented immediately following the final negotiations, the time required to develop this agreement is not well defined.

Environmental and Permitting

Discharges of SVWQCP recycled water to Arroyo Simi-Las Posas will need to comply with the City's NPDES permit and the RWQCB TMDL limits.

Additional permitting is not anticipated for this project.

Project Complexity

This project will rely on existing infrastructure and can be implemented once an agreement is developed and finalized between the City and FCGMA.

This project and project number 6, Delivery of Recycled Water to Las Posas Valley users via pipeline, both would rely on recycled water produced at the SVWQCP. Because of this, the volume of water available for discharge maintenance to Arroyo Simi Creek will depend on the volume of water delivered to Las Posas Valley users via pipeline. Additionally, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), which lowers groundwater elevations in the Shallow Alluvial Aquifer, and the Arundo Removal Project (Project No. 1), which reduces evapotranspiration losses upstream of the LPV.

Anticipated Project Lifespan

FCGMA anticipates that the lifespan of this project will exceed 25 years.

2.2.5.3 Cost and Funding

While the cost to purchase SVWQCP water from the City is not well defined, FCGMA anticipates that this water will cost less than the $500/AF evaluation criterion, and that the City will be responsible for Operation and Maintenance of the SVWQCP and its discharge infrastructure.

2.2.5.4 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

Surface water infiltration through the bottom of Arroyo Simi–Las Posas is a primary recharge mechanism for the ELPMA. Perennial flow in Arroyo Simi–Las Posas did not begin until the 1970s, when discharges of treated wastewater effluent, and eventually discharge from shallow dewatering wells, began upstream of the ELPMA boundary. These perennial flows resulted in rising groundwater levels throughout the southern part of the ELPMA between 1974 and 2015. The beneficial users of surface water and groundwater in the ELPMA do not have control over the upstream discharges of water to Arroyo Simi–Las Posas, and recharge to the ELPMA would be reduced if those discharges are reduced. Therefore, purchase of this discharge would provide a measure of security for the users of groundwater and surface water in the ELPMA. Fundamentally, this project would help maintain groundwater elevations in Arroyo Simi–Las Posas and directly addresses the measurable objectives selected for the ELPMA. Additionally, this project would maintain native habitat and provide flood control benefit.

While implementation of this project is anticipated to support groundwater level and storage management within the ELPMA, perennial surface water flow in Arroyo Simi-Las Posas is also thought to be the primary source of high TDS concentrations observed in the groundwater in the southern ELPMA (FCGMA 2019). Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA and the City of Simi Valley.

2.2.6 Project 6: Delivery of Recycled Water to Las Posas Valley Users via Pipeline

The Delivery of Recycled Water to Las Posas Valley Users via Pipeline project would consist of constructing a pump station and conveyance pipeline, in addition to formalizing an agreement with the City, to deliver recycled water from SVWQCP to Las Posas Valley users. In 2017, an initial evaluation of this project identified Berylwood Heights MWC and Zone MWC as potential recipients of this water, however, the project has not undergone additional development since the initial study (CMWD 2017).

This project is consistent with the project in the Judgment titled *Formalizing an agreement with the City for recycled water deliveries to Las Posas Valley uses via pipeline, which shall include cooperation with and support of the City, as necessary, in its interactions with the LA Waterboard on this issue of recycled water* (Judgment §5.4.6).

2.2.6.1 Water Supply

In 2017, the City indicated that approximately 3,000 AFY of recycled water would be available for delivery to Berylwood Heights MWC and Zone MWC.

2.2.6.2 Timing and Feasibility

Project Phasing and Timing

Because this project has not been further evaluated since 2017, FCGMA anticipates that this project would be implemented in two phases:

Phase I will consist of a feasibility study to better define the:

- Users who would participate in this project by using recycled water in lieu of groundwater.
- Project benefits.
- Conveyance infrastructure requirements.
- Permitting, land agreements, and environmental compliance requirements.
- Capital and O&M costs.
- Schedule for project construction and maintenance.

FCGMA anticipates that implementation of Phase I could be completed within a 2-year timeframe following commitment of funds for the feasibility study.

Phase II would consist of negotiating easements, environmental compliance and permitting, project construction, and developing agreements between FCGMA, the City, and Las Posas Valley users to receive SVWQCP recycled water. The schedule to implement Phase II is not presently well defined and would be determined during the Phase I feasibility study.

Environmental and Permitting

Full implementation of this project would require construction of a pump station and conveyance infrastructure. Permitting requirements to construct these facilities would be identified through an initial feasibility study.

Project Complexity

While this project will rely on existing technology, it is considered moderately complex because: (i) project construction may require significant coordination and mitigation to negotiate easements and convey recycled water from the Simi Valley to Zone MWC and/or Berylwood Heights MWC, (ii) project construction may require multiple phases, and (iii) project feasibility and operation will depend on the long-term availability, and price, of SVWQCP recycled water. The volume of water available for this project will also depend on the volume of SVWQCP recycled water that is committed to Project Number 5, Arroyo Simi-Las Posas Water Acquisition. Construction phasing will be identified in the Phase I feasibility study.

Additionally, recipients of the recycled water may be required to construct, operate, and maintain desalter facilities to reduce constituent concentrations to levels suitable for irrigation and to ensure that long-term use of this water does not result in a significant and unreasonable degradation of water quality in the LPV. The need to desalt recycled water prior to use will be characterized in the Phase I feasibility study.

Anticipated Project Lifespan

FCGMA anticipates that the lifespan of this project will exceed 25 years.

2.2.6.3 Cost and Funding

FCGMA estimates that the cost to complete the Phase I feasibility study is approximately $400,000.

In 2017, CMWD estimated costs to construct this project. Assuming that the project would require the construction of a 100 HP pump station and 8.6-miles of 16-inch conveyance pipeline, CMWD estimated that the cost to construct this project would be approximately $17.2 million. Adjusting this by the CPI leads to an estimated capital cost for Phase II of this project of $22.1 million. Assuming:

- O&M costs are equal to 3% of the capital costs;
- The project would provide 3,000 AFY of SVWQCP recycled water to users via pipeline; and
- A 25-year project lifespan

Leads to a cost estimate of approximately $700 per AF to construct and operate Phase II of this project. This does not include the cost to purchase and/or lease water from the City. Additionally, this does not include any costs required to construct, operate, and maintain local desalters to treat the recycled water to levels suitable for irrigation and to avoid significant and unreasonable degradation of water quality.

2.2.6.4 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

FCGMA anticipates that project benefits would be similar to Project Number 2, Purchase of Imported Water from CMWD for Basin Replenishment, because implementation of this project would reduce groundwater production and assist with water level recovery. FCGMA anticipates that the water level recovery benefits would be quantified through numerical modeling conducted in the Phase I Feasibility Study.

The SVWQCP NPDES permit sets limits on the TDS, chloride, and sulfate concentrations of the tertiary treated recycled water. The limits may locally exceed the concentrations of TDS, chloride, and sulfate measured in groundwater. Consequently, if this project is pursued further, the water quality of the SVWQCP recycled water will have to be investigated further and addressed in the feasibility study.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA, the City, and Las Posas Valley Users able to receive and use SVWQCP recycled water in lieu of groundwater.

2.2.7 Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study

This project seeks to evaluate the feasibility of providing supplemental water supplies to the northern area of the ELPMA. The GSP identified the area of the ELPMA north of the Moorpark anticline as a region where groundwater elevations have exhibited historical declines that locally exceed 250 feet. Groundwater elevation trends in this part

of the ELPMA differ from those measured in the southern portion of the ELPMA, where groundwater elevations have experienced periods of recovery in response to increasing flow in Arroyo Simi-Las Posas. Groundwater elevations north of the Moorpark anticline are less responsive to flows in Arroyo Simi-Las Posas and are primarily influenced by groundwater production and CMWD's Aquifer Storage and Recovery (ASR) operations. Supplemental water supplies to this area will reduce groundwater demand in this part of the ELPMA.

This project is consistent with the project in the Judgment titled *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* (Judgment §5.4.7).

2.2.7.1 Water Supply

This project is a feasibility study and will not provide a new source of water supply to the LPV. Preliminary modeling has been conducted, but a feasibility study needs to be completed to identify infrastructure needs, waters supply availability, and Las Posas Valley Users in the northern ELPMA willing to use a supplemental source of water in lieu water of groundwater.

2.2.7.2 Timing and Feasibility

Project Phasing and Timing

This feasibility study would be completed in a single phase, and it is anticipated that the study can be completed within a 2-year timeframe following commitment of funds for the project. If a feasible project is identified through this study, timetables for permitting, construction, and project implementation will be developed.

Environmental and Permitting

This is a paper study that will not require permitting and /or environmental compliance.

Project Complexity

This paper study is considered low complexity and is not dependent on other projects.

Anticipated Project Lifespan

Not applicable.

2.2.7.3 Cost and Funding

FCGMA anticipates that this feasibility study can be completed for approximately $110,000.

2.2.7.4 Benefits relative to Sustainable Groundwater Management

2.2.7.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

This feasibility study is expected to provide a clear understanding of volume of supplemental water supplies, and corresponding piping infrastructure, required to offset groundwater demands and maintain groundwater elevations above the minimum thresholds in the northern portion of the ELPMA. In addition, this feasibility study will provide stakeholders with estimated costs associated with the supplemental water deliveries and corresponding infrastructure requirements and will also provide stakeholders with an estimate of the potential increase to the sustainable yield of the ELPMA.

Collaboration Requirements

This feasibility study may require coordination with MWCs and/or water purveyors whose service area extends north of the Moorpark anticline to identify entities that are able to receive and deliver supplemental water supplies to offset groundwater extractions.

2.2.8 Project 8: Developing a Least Cost Acquisition Program

This project seeks to develop a program for the least cost acquisition of allocation basis or annual allocations, or Carryover, as an alternative to Basin replenishment. This would include, but may not be limited to, developing a framework for:

- The cost to purchase annual allocations or Carryover.
- The cost to purchase allocation basis.
- The prioritization of purchases from water deficit areas of the LPV.
- The identification of a recommended program mechanism and alternatives.

This project is consistent with the project in the Judgment titled *Developing a program for the least cost acquisition of Allocation Basis or Annual Allocations, or Carryover as an alternative to Replenishment* (Judgment §5.4.8).

2.2.8.1 Water Supply

This project is a paper study to develop a Least Cost Acquisition Program. The study will not provide a new water supply or directly increase the yield of the LPV.

2.2.8.2 Timing and Feasibility

Project Phasing and Timing

This study would be completed in a single phase and FCGMA anticipates that this can be completed within a 1-year timeframe following commitment of funds for the project. Importantly, this program would require development of a policy framework by the Watermaster Board in consultation with the PAC and TAC. The timeline to implement the Least Cost Allocation Acquisition Program will be developed as part of the initial paper study.

Environmental and Permitting

This is a paper study that will not require permitting and /or environmental compliance.

Project Complexity

FCGMA anticipates that the development of this program will be moderately complex and will require development of a framework to ensure that water costs, acquisition timing, and acquisition preference / locale are appropriately defined. This will require policy development by the Watermaster Board in consultation with PAC and TAC and input from Water Rights Holders. This paper study is not dependent on other projects.

Anticipated Project Lifespan

FCGMA anticipates that the Program developed through this project would have a lifespan that exceeds 25 years. However, this Program should be re-evaluated at a 5-year frequency to ensure that water costs and priority areas are appropriately reflected in the Program.

2.2.8.3 Cost and Funding

FCGMA anticipates that this study will cost approximately $100,000. Annual costs to implement the resulting Program will be estimated through this study.

2.2.8.4 Benefits relative to Sustainable Groundwater Management

2.2.8.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

This study is expected to provide a clear understanding of costs and mechanism(s) through which FCGMA can implement a program to purchase and/or lease allocation basis, annual allocations, or Carryover, as an alternative to Basin replenishment. Implementation of the resulting program is anticipated to support groundwater level stabilization in water deficit areas of the LPV and maintain groundwater elevations above the minimum thresholds, thereby improving groundwater level and storage management. Implementation of the resulting program is not anticipated to result in undesirable results or Material Injury that cannot be mitigated.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA and the PAC and TAC to appropriately define water costs and priority Program implementation areas.

2.2.9 Project 9: Construction of additional dedicated monitoring wells

This project proposes installation of multi-depth monitoring wells in the WLPMA and ELPMA of the LPV to assess groundwater conditions in the principal aquifers of the LPV that lack data. The GSP determined that there were spatial data gaps in the understanding of aquifer conditions and identified four potential new well locations that

would help fill the identified gaps. In the WLPMA, the GSP identified the boundary between the WLPMA and the Oxnard Subbasin as an area that would benefit from additional groundwater monitoring to improve characterization of groundwater gradients across the basin boundary. In the ELPMA, the GSP identified the potential groundwater dependent ecosystem located along Arroyo Simi-Las Posas as a region that would benefit from additional groundwater monitoring. A new multi-depth groundwater monitoring well in this location would provide data on whether the vegetation in the riparian corridor relies on groundwater or soil moisture from infiltrating surface water. In addition, the GSP notes that there are limited dedicated monitoring wells screened in the Grimes Canyon aquifer in the ELPMA and that adding a monitoring well would improve the understanding of groundwater gradients between the Fox Canyon aquifer and Grimes Canyon aquifer.

Since submittal of the GSP, well 02N20W04F02S, a key well in the ELPMA, was destroyed. A new dedicated monitoring well to replace this well would provide better characterization of groundwater conditions in the western part of the ELPMA. In addition to this well, FCGMA identified the pumping depression in the eastern portion of the WLPMA as an area that would benefit from a new dedicated monitoring well.

2.2.9.1 Water Supply

This project will improve the monitoring and characterization of groundwater conditions within the LPV but will not increase water supplies or the sustainable yield of the LPV.

2.2.9.2 Timing and Feasibility

Project Phasing and Timing

Installation of monitoring wells could be completed in two phases:

Phase I would consist of an initial well siting study, development of a well specification package, and development of request for bid documentation. This phase could be completed within a 6-month timeframe following commitment of funds for the project.

Phase II would consist of: procuring a drilling contractor; designing, constructing, and developing each dedicated monitoring well; and preparing well completion reports. This phase could be completed within a 1.5-year timeframe following commitment of funds for the project.

Environmental and Permitting

CEQA and NEPA are not required to implement this project. FCGMA will coordinate with VCWPD to permit the proposed monitoring wells.

Project Complexity

This project is not considered technically complex. FCGMA successfully completed the drilling, design, and construction of dedicated monitoring wells in the Oxnard Subbasin and Pleasant Valley Basin in 2024.

Anticipated Project Lifespan

FCGMA anticipates that the lifespan of the monitoring wells constructed through this project would exceed 25 years.

2.2.9.3 Cost and Funding

The cost to complete Phase I of this project is approximately $50,000. The cost per new well, based on FCGMA's recent well construction activities, is anticipated to be approximately $550,000. No outside sources of funding to construct this project have been identified, however, Watermaster staff continuously monitor for potential grant funding and will investigate the possibility of installing one or more wells through the DWR Technical Support Services program. Because this project will not increase water supplies within the LPV, FCGMA has assigned the total water costs to implement this project a value of ">$3,000 per AF".

2.2.9.4 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

The expected benefits of this project lie in the additional data gathered from the well installation process and the ongoing monitoring of the groundwater conditions at the well sites. This data can be used to refine the conceptual and numerical models of the LPV. Such refinement may result in reevaluation and adjustment of the minimum thresholds or measurable objectives and is anticipated to improve groundwater level, storage, and quality management within the LPV by providing new data in areas and aquifers identified as data gaps. Implementation of this project is consistent with SGMA and is not anticipated to result in undesirable results or cause Material Injury that cannot be mitigated.

Collaboration Requirements

Implementation of this project may require coordination between FCGMA and Water Rights Holders to obtain necessary easements and access agreements to construct and monitoring the new dedicated monitoring wells. Land access and easement requirements will be identified during initial project planning.

2.2.10 Project 10: Installation of transducers in groundwater monitoring wells

This project proposes installation of transducers in representative monitoring points, or key wells, in the LPV. The GSP determined that there were temporal data gaps in the understanding of aquifer conditions. These data gaps limit the number of wells that can be used to contour spring high and fall low groundwater conditions. These temporal data gaps also impact estimates of the change in groundwater in storage in the LPV. The temporal data gaps have persisted in each annual report prepared after the GSP was submitted to DWR. Additionally, as most key wells are agricultural irrigation wells, transducers will help assure that measured groundwater levels are static water levels unaffected by recovery or potential well interference. The addition of transducers will help ensure that spring high and fall low groundwater levels are collected from representative monitoring points within a 2-week window, as recommended by DWR, and will provide a clearer understanding of groundwater conditions during the spring and fall measurement events. This will allow better comparison for annual change in storage estimates and will facilitate sustainable management of the LPV.

2.2.10.1 Water Supply

Installation of transducers can be completed within a 1-year timeframe following commitment of funds for the project.

2.2.10.2 Timing and Feasibility

Project Phasing and Timing

Installation of transducers can be completed within a 2-year timeframe following commitment of funds for the project.

Environmental and Permitting

Equipping existing wells with transducers will not require additional environmental compliance or permitting.

Project Complexity

This project is not considered technically complex. However, because the majority of key wells in the LPV are active groundwater extraction wells, the feasibility of equipping each well with a transducer will depend on the existing well construction and uses. Installation of transducers in wells equipped with turbine pumps may require installation of sounding tubes and modification of the wellheads.

Anticipated Project Lifespan

FCGMA anticipates the need to replace transducers every 5 to 10 years.

2.2.10.3 Cost and Funding

The cost is anticipated to be approximately $140,000 for eleven well locations. Potential funding sources include DWR TSS or SGM grant funds, as well as potential funding through the Basin Assessment. Because this project will not increase water supplies within the LPV, FCGMA has assigned the total water costs to implement this project a value of ">$3,000 per AF".

2.2.10.4 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

The expected benefits of this project lie in the additional high-frequency data gathered from the well, which is anticipated to provide a clearer understanding of groundwater conditions during the spring and fall measurement events. This will allow for better comparison for annual change in groundwater in storage estimates and will facilitate sustainable groundwater management of the LPV.

Implementation of this project is consistent with SGMA and is not anticipated to result in undesirable results or cause Material Injury that cannot be mitigated.

Collaboration Requirements

Implementation of this project will requirement coordination between FCGMA and Water Rights Holders to develop agreements to outfit and maintain transducers in privately owned wells.

2.3 Project Prioritization

This section of the Basin Optimization Plan summarizes the scores and rank of each project. A detailed description of the project scoring is included in Appendix B, Project Ranking Sheets.

2.3.1 Water Supply Projects

Of the 10 projects evaluated, six are projects that would increase water supply and/or increase the Operating Yield of the LPV. Three projects are sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits. These projects are: (i) Arroyo Simi-Las Posas Arundo Removal, (ii) Purchase of Imported Water from CMWD for Basin Replenishment, and (iii) Arroyo Simi-Las Posas Water Acquisition. The prioritization of these three projects, based on their individual project scores and ranks, are included in Table 2.

Table 2. Water Supply Project Prioritization

Project No.	Project Title	Summary of Evaluation					
		Total Score	Water Supply Benefit	Timing / Feasibility	Cost	Benefits relative to SGM	Recommended for Inclusion in the BOY
5	Arroyo Simi-Las Posas Water Acquisition	95	35	23	22	15	Yes
2	Purchase of Imported Water from CMWD for Basin Replenishment	92	15	50	12	15	Yes
1	Arroyo Simi-Las Posas Arundo Removal	90	15	38	12	15	Yes

Notes: CMWD = Calleguas Municipal Water District. BOY = Basin Optimization Yield Study.

2.3.2 Feasibility Study and Data Gap Projects

The seven remaining projects evaluated in the Basin Optimization Plan are recommended for additional feasibility studies or implementation to address data gaps in the LPV. The prioritization of these projects, based on their individual project scores and ranks, are included in Table 3.

Table 3. Feasibility Study and Data Gap Project Prioritization

Project No.	Project Title	Summary of Evaluation					
		Total Score	Water Supply Benefit	Timing / Feasibility	Cost	Benefits relative to SGM	Recommended for Inclusion in the BOY
8	Designing a Least Cost Acquisition Program	80	10	38	22	10	No
4	Moorpark Desalter	69	25	21	3	20	No
3	Arroyo Las Posas Storm Water Capture and Recharge	66	15	33	3	15	No
6	Deliveries of Recycled Water to Las Posas Valley Users via Pipeline	64	20	17	12	15	No
9	Design and Installation of Dedicated Monitoring Wells	59	10	41	3	5	No
10	Installation of Pressure Transducers in Groundwater Monitoring Wells	59	10	41	3	5	No
7	In Lieu Deliveries to Northern East Las Posas Feasibility Study	57	15	34	3	5	No

Notes: BOY = Basin Optimization Yield Study.

3 Project Implementation Schedule

Appendix C provides a schedule to implement all 10 of the projects evaluated in this plan. The schedule is separated by project type (i.e., water supply vs. feasibility study and data gap project) and provides estimated completion dates for each project and phase, as applicable.

4 5-Year Project Implementation Budget

Appendix D provides a high-level cost estimate to implement all 10 projects through the end of 2029. The costs are presented by quarterly estimate and are separated by project type (i.e., water supply vs. feasibility study and data gap project). To develop these quarterly cost estimates, the total estimated project cost was evenly distributed across the anticipated project implementation timeframe and/or lifespan, as appropriate. The costs included here are intended to provide a high-level estimate of total project costs and distributions, with further refinement provided as each project is scoped, funded, and implemented.

5 References

Calleguas Municipal Water District (CMWD). 2017. Las Posas Replacement Water Study. Prepared by Kennedy Jenks. August 2017.

Fox Canyon Groundwater Management Agency (FCGMA). 2019. Groundwater Sustainability Plan for the Las Posas Valley Basin. January 2019.

Fox Canyon Groundwater Management Agency (FCGMA). 2024. Draft First Periodic Evaluation: Groundwater Sustainability Plan for the Las Posas Valley Basin. August 2024.

Ventura County Water and Sanitation Department (VCWSD). 2015. Arroyo Las Posas and Arroyo Simi Arundo Removal Feasibility and Water Savings Study. Prepared by Wildscape Restoration. January 2015.

Ventura County Waterworks District No. 1 (VCWWD-1). 2020. Draft Technical Memorandum: MWRF Stormwater Diversion and Groundwater Recharge Feasibility Study. Prepared by Resource Consultants, Inc.

Ulrich, C., S. Uhlemann, M. Newcomer, and P. Fish. Not Dated. Arroyo Las Posas Stormwater Diversion Feasibility Study and Diversion Test. Prepared for Ventura County Waterworks District No. 1.

Appendix A

Project Evaluation Checklist and Project Ranking Sheet

LAS POSAS VALLEY WATERMASTER

c/o Fox Canyon Groundwater Management Agency
800 S. Victoria Avenue | Ventura, CA 93009-1610 | Tel: (805) 654-2010 | LPV.Watermaster@ventura.org

Project Evaluation Checklist

BACKGROUND INFORMATION	
Project Name:	(Please fill in)
Purpose of Project:	(Please select one)
Project Type:	(Please select one)
Sponsoring Agency:	(Please fill in)
Management Area:	(Please select one)
Location:	(Please fill in)
Project Description:	(Please fill in)
Implementation Trigger (if applicable):	(Please fill in)

Evaluation Criteria	Response (Applicant to Complete)
Water Supply	
Annual increase in Sustainable Yield (AFY):	(Please fill in)
Annual increase in supplemental water in lieu of pumping (AFY):	(Please fill in)
Groundwater demand reduction (AFY):	(Please fill in)
List all sustainability indicators addressed by the project:	(Please fill in)
Project documentation included?	(Please select one)
Timing/Feasibility	
Project Implementation Timeframe	
Current Project status:	(Please select one)
Estimated time to Project completion (years):	(Please fill in)
Timeline / feasibility documentation included?	(Please select one)
Environmental	
CEQA/NEPA type:	(Please select one)
Status of CEQA/NEPA review and permitting:	(Please select one)
Will the Project likely be permitted?	(Please select one)
Sensitivity of location:	(Please fill in)
Permitting	
Permits required:	(Please fill in)
Status / time required:	(Please fill in)
Likelihood of Project being permitted:	(Please select one)

LAS POSAS VALLEY WATERMASTER

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Project Evaluation Checklist

Project Complexity	
Does the Project use new technology:	(Please select one)
Does the Project require land acquisition:	(Please select one)
Status of the land acquisition process:	(Please select one)
Is the Project dependent on other unbuilt or unfunded projects:	(Please select one)
Is the Project dependent on funded projects currently under construction:	(Please select one)
Description of Operation and Maintenance (if applicable):	(Please fill in)
Project Lifespan	
What is the projected lifespan of the Project:	(Please fill in)
Project Phasing	
Please provide documentation of anticipated project phasing, including schedules and costs (capital and O&M) for each phase, as an attachment to this form.	
Does Project require multiple phases of construction?	(Please select one)
No. of anticipated construction phases:	(Please fill in)
Description of phases:	(Please fill in)
Phasing timeline:	(Please fill in)
Total cost per phase:	(Please fill in)
Project phasing documentation attached?	(Please select one)
Cost and Funding	
Total capital cost:	(Please fill in)
Total annual Operations & Maintenance (O&M) Cost:	(Please fill in)
Is the project Proponent providing a funding match to construct the project?	(Please fill in)
Is there a funding source other than FCGMA for ongoing operation and maintenance costs?	(Please fill in)
Additional Project Considerations	
Is it necessary to collaborate and/or coordinate with FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Rights Holders for project implementation?	(Please select one)
If yes, please describe the anticipated collaboration/coordination.	(Please fill in)
Describe any material and unreasonable impacts that cannot be mitigated and/or any negative impacts to sustainability indicators caused by the project.	(Please fill in)
Project Proponent Contact Information	**Response (Applicant to Complete)**
Name:	(Please fill in)

LAS POSAS VALLEY WATERMASTER

c/o Fox Canyon Groundwater Management Agency

800 S. Victoria Avenue | Ventura, CA 93009-1610 | Tel: (805) 654-2010 | LPV.Watermaster@ventura.org

Project Evaluation Checklist

Title:	(Please fill in)
Organization:	(Please fill in)
Email:	(Please fill in)
Phone:	(Please fill in)
Date:	(Please fill in)

LAS POSAS VALLEY WATERMASTER

c/o Fox Canyon Groundwater Management Agency

800 S. Victoria Avenue | Ventura, CA 93009-1610 | Tel: (805) 654-2010 | LPV.Watermaster@ventura.org

Project Ranking Sheet

Project Name_____ **Project Type**_____

Sponsoring Agency_____ **Mgmt. Area**_____

WATER SUPPLY

1. Total Sustainable Yield / Supplemental Water / Reduced Demand

Total additional water supplied by the project for the benefit of the basin through increase to sustainable yield, supplemental water to be delivered in lieu of pumping, or reduction in groundwater demand.

_____AFY increased sustainable yield

_____AFY supplemental water in lieu of pumping

_____AFY groundwater demand reduction

Points Awarded

5	10	15	20	25
<500 AFY	≤500 AFY <2,500 AFY	≤2,500 to AFY <5,000 AFY	≤5,000 AFY <7,500 AFY	≥7,500 AFY

2. Sustainable Yield / Supplemental Water / Reduced Demand Documentation

Project documentation includes verifiable quantified estimate of increased sustainable yield, supplemental water, and/or reduced groundwater demand.

Points Awarded

5	10	15	20	25
Conceptual estimate - no supporting documentation	Conceptual estimate - limited supporting documentation	Initial feasibly study supporting estimate	Preliminary design and/or modeling supporting estimate	Detailed design and/or modeling supporting estimate

TIMING / FEASIBILITY

3. Project Implementation Timeframe

What is the project implementation timeframe?

Points Awarded

1	5	10	15	20
Cannot be implemented prior to 2040	May be operational by 2040, but uncertain	Can be operational by 2040	Can be operational in 10 years or less	Can be operational in 5 years or less

4. Development Phase

How far along is the definition, feasibility, design, and development of the project?

Points Awarded

1	2	3	4	5
Conceptual – no feasibility or design, project not well defined	Feasibility study in progress, project well defined	Initial feasibly study completed	30% engineering design	60% or greater engineering design

5. Status of Approvals, Permits, and Environmental Review

What is the status of NEPA/CEQA review and permitting?

Points Awarded

1	2	3	4	5
Permit requirements not identified or unknown	Expected to take >5 years	Underway and approvals expected <3 years	Underway and approvals expected ≤1 year	Permitting and CEQA / environmental review complete

6. Project Complexity

How complex is the project? For example, does it require multiple phases of construction; does it use proven technology; does it require land acquisition; is dependent upon other projects; and/or does it require complex permitting?

Points Awarded

1		3		5
Very complex, relies on unproven technology		Moderately complex		Low complexity, uses readily available proven technology

7. Land Acquisition

Does the project require land acquisition or easements, and if so, what is the status?

Points Awarded

1	2	3	4	5
Required, not started and/or potential eminent domain	Process started, but less than 25% complete	>25% but <50% complete	More than 50% complete	Not required or all acquisitions and/or easements complete

8. Dependency on Other Projects

Is the project dependent upon other projects?

Points Awarded

1		3		5
Project is dependent on other unbuilt and unfunded projects		Project is dependent on funded projects under construction		Not dependent on other unbuilt projects

9. Project Lifespan

What is the projected lifespan of the project?

Points Awarded

1	2	3	4	5
≤5 years		10 years		≥20 years

COST & FUNDING

10. Water Cost

Projected total cost of water produced, saved, or increase in sustainable yield.

$_____ Total capital cost

$_____ Total annual O&M cost

$_____ Annual O&M cost per AF

$_____ Annual cost (all costs including capital and O&M) per AF

Points Awarded

1	5	10	15	20
≥$3,000 / AF	≤$2,000 / AF <$3,000 / AF	≤$1,000 / AF <$2,000 / AF	>$500 / AF <$1,000 / AF	≤$500 / AF

11. Funding Match for Construction

Is the project proponent providing a funding match to construct the project?

Points Awarded

1	4	8	12	15
No match	<10% match	10 to 25% match	25 to 50% match	>50% match

12. O&M Funding

Is there a funding source other than FCGMA for ongoing operation & maintenance costs?

Points Awarded

1	4	8	12	15
No funding identified	25%	50% of funding committed	75%	100% of funding committed

ADDITIONAL PROJECT CONSIDERATIONS

13. Collaboration/Cooperation/Participation

Is it necessary or desirable to collaborate and/or coordinate with FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders for project implementation?

Points Awarded

N/A
Coordination requirements will not impact final project scoring.

14. Impact on Sustainability Indicators

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)?

Points Awarded

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.

Ranked by_____ **Date**_____

Appendix B
Project Ranking Sheets

Appendix B
Project Scoring Matrix

Project Number	Project Names	FCGMA Evaluation Criteria Scores			
		Water Supply			
		Total Sustainable Yield/ Supplemental Water/ Reduced Demand	Pts	Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Pts
1	**Arroyo Simi-Las Posas Arundo Removal**	500 to <2500 AFY	10	Conceptual estimate - no supporting documentation	5
2	**Purchase of Imported Water from CWMD for Basin Replenishment**	500 to <2500 AFY	10	Conceptual estimate - no supporting documentation	5
3	**Arroyo Las Posas Storm Water Capture and Recharge**	500 to <2500 AFY	10	Conceptual estimate - no supporting documentation	5
4	**Moorpark Desalter**	500 to <2500 AFY	10	Initial feasibility study supporting estimate	15
5	**Arroyo Simi-Las Posas Water Acquisition**	2500 to <5000 AFY	15	Preliminary Design and / or modeling supporting estimate	20
6	**Delivery of Recycled Water to Las Posas Valley Users via Pipeline**	2500 to <5000 AFY	15	Conceptual estimate - no supporting documentation	5
7	**In Lieu Deliveries to Northern ELPMA Feasibility Study**	<500 AFY	5	Conceptual Estimate - limited documentation	10
8	**Developing a Least Cost Acquisition Program**	<500 AFY	5	Conceptual estimate - no supporting documentation	5
9	**Construction of Additional Dedicated Monitoring Wells**	<500 AFY	5	Conceptual estimate - no supporting documentation	5
10	**Installation of Transducers in Groundwater Monitoring Wells**	<500 AFY	5	Conceptual estimate - no supporting documentation	5

Appendix B
Project Scoring Matrix

Project Number	Project Names	FCGMA Evaluation Criteria Scores													
		Timing / Feasibility													
		Project Implementation Timeframe	Pts	Development Phase	Pts	Status of Approvals, Permits, and Environmental Review	Pts	Project Complexity	Pts	Land Acquisition	Pts	Dependencey on Other Projects	Pts	Project Lifespan	Pts
1	**Arroyo Simi-Las Posas Arundo Removal**	Can be operational in 5 years or less	20	Conceptual - no feasibility or design, project not well defined	1	Permit requirements not identified or unknown	1	Low complexity, uses readily available proven technology	5	Required, not started and/or potential eminent domain	1	Not dependent on other unbuilt projects	5	>20 years	5
2	**Purchase of Imported Water from CWMD for Basin Replenishment**	Can be operational in 5 years or less	20	60% or greater engineering design	5	Permitting and CEQA/ environmental review complete	5	Low complexity, uses readily available proven technology	5	Not required or all acquisitions an/or easements complete	5	Not dependent on other unbuilt projects	5	>20 years	5
3	**Arroyo Las Posas Storm Water Capture and Recharge**	Can be operational by 2040	10	FS in progress, project well defined	2	Underway and approvals expected < 3 years	3	Moderately Complex	3	Not required or all acquisitions an/or easements complete	5	Not dependent on other unbuilt projects	5	>20 years	5
4	**Moorpark Desalter**	May be operational by 2040, but uncertain	5	Conceptual - no feasibility or design, project not well defined	1	Permit requirements not identified or unknown	1	Moderately Complex	3	Required, not started and/or potential eminent domain	1	Not dependent on other unbuilt projects	5	>20 years	5
5	**Arroyo Simi-Las Posas Water Acquisition**	May be operational by 2040, but uncertain	5	Conceptual - no feasibility or design, project not well defined	1	Permit requirements not identified or unknown	1	Low complexity, uses readily available proven technology	5	Not required or all acquisitions an/or easements complete	5	Project is dependent on other unbuilt and unfunded projects	1	>20 years	5
6	**Delivery of Recycled Water to Las Posas Valley Users via Pipeline**	May be operational by 2040, but uncertain	5	Conceptual - no feasibility or design, project not well defined	1	Permit requirements not identified or unknown	1	Moderately Complex	3	Required, not started and/or potential eminent domain	1	Project is dependent on other unbuilt and unfunded projects	1	>20 years	5
7	**In Lieu Deliveries to Northern ELPMA Feasibility Study**	Can be operational in 5 years or less	20	Conceptual - no feasibility or design, project not well defined	1	Permit requirements not identified or unknown	1	Low complexity, uses readily available proven technology	5	Required, not started and/or potential eminent domain	1	Not dependent on other unbuilt projects	5	<5 years	1
8	**Developing a Least Cost Acquisition Program**	Can be operational in 5 years or less	20	Conceptual - no feasibility or design, project not well defined	1	Permit requirements not identified or unknown	1	Low complexity, uses readily available proven technology	5	Not required or all acquisitions an/or easements complete	5	Not dependent on other unbuilt projects	5	<5 years	1
9	**Construction of Additional Dedicated Monitoring Wells**	Can be operational in 5 years or less	20	Conceptual - no feasibility or design, project not well defined	1	Underway and approvals expected <1 year	4	Low complexity, uses readily available proven technology	5	Required, not started and/or potential eminent domain	1	Not dependent on other unbuilt projects	5	>20 years	5
10	**Installation of Transducers in Groundwater Monitoring Wells**	Can be operational in 5 years or less	20	Conceptual - no feasibility or design, project not well defined	1	Underway and approvals expected <1 year	4	Low complexity, uses readily available proven technology	5	Required, not started and/or potential eminent domain	1	Not dependent on other unbuilt projects	5	>20 years	5

Appendix B
Project Scoring Matrix

Project Number	Project Names	FCGMA Evaluation Criteria Scores									TOTAL POINTS	Project Rank
		Cost & Funding						Additional Project Considerations				
		Water Cost	Pts	Funding Match for Construction	Pts	O&M Funding	Pts	Collaboration / Participation Required	Pts	Impacts on Sustainability Indicators	Pts	
1	**Arroyo Simi-Las Posas Arundo Removal**	<$500 / AF	20	No Match	1	No funding identified	1	Yes	0	May help mitigate two sustainability indicators	15	**90**	**3**
2	**Purchase of Imported Water from CWMD for Basin Replenishment**	$1000 to $2000 /AF	10	No Match	1	No funding identified	1	Yes	0	May help mitigate two sustainability indicators	15	**92**	**2**
3	**Arroyo Las Posas Storm Water Capture and Recharge**	>$3000 / AF	1	No Match	1	No funding identified	1	Yes	0	May help mitigate two sustainability indicators	15	**66**	**6**
4	**Moorpark Desalter**	>$3000 / AF	1	No Match	1	No funding identified	1	Yes	0	May help mitigate three or more sustainability indicators	20	**69**	**5**
5	**Arroyo Simi-Las Posas Water Acquisition**	<$500 / AF	20	No Match	1	No funding identified	1	Yes	0	May help mitigate two sustainability indicators	15	**95**	**1**
6	**Delivery of Recycled Water to Las Posas Valley Users via Pipeline**	$1000 to $2000 /AF	10	No Match	1	No funding identified	1	Yes	0	May help mitigate two sustainability indicators	15	**64**	**7**
7	**In Lieu Deliveries to Northern ELPMA Feasibility Study**	>$3000 / AF	1	No Match	1	No funding identified	1	No.	0	Does not address sustainability indicators	5	**57**	**10**
8	**Developing a Least Cost Acquisition Program**	<$500 / AF	20	No Match	1	No funding identified	1	No.	0	May help mitigate one sustainability indicator	10	**80**	**4**
9	**Construction of Additional Dedicated Monitoring Wells**	>$3000 / AF	1	No Match	1	No funding identified	1	No.	0	Does not address sustainability indicators	5	**59**	**8**
10	**Installation of Transducers in Groundwater Monitoring Wells**	>$3000 / AF	1	No Match	1	No funding identified	1	No.	0	Does not address sustainability indicators	5	**59**	**8**

Appendix B
Project Scoring Matrix

Arroyo Simi Las Posas Arundo Removal	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	500 to <2500 AFY	To support development of the GSP, the Nature Conservancy estimated that Arundo Donax removal from approximately 324 acres of land within the Arroyo Simi-Las Posas corridor could result in an increase in up to an additional 2,680 AFY of recharge to the ELPMA. These estimates were based on a 2015 feasibility study conducted by VCWSD.
		Points	10	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	In 2015, VCWSD conducted a study to characterize water savings associated with removing Arundo Donax from the Arroyo Simi-Las Posas corridor. The study demonstrates that the net water savings associated with Arundo Removal is 2,680 AFY. However, the volume of this water savings that ultimately recharges the ELPMA is not characterized. Additional modeling is required.
		Points	5	
	Timing / Feasibility	Project Implementation Timeframe	Can be operational in 5 years or less	The project will be implemented in two phases: Phase (1) - development of an arundo work plan (2 years) Phase (2) - Arundo Removal (1 to 2 years)
		Points	20	
		Development Phase	Conceptual - no feasibility or design, project not well defined	The work plan for this project has not been developed. Because of this, the scope / scale of this project is considered preliminary.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	Specific permitting and CEQA requirements will be identified as part of the work plan development.
		Points	1	
		Project Complexity	Low complexity, uses readily available proven technology	Similar projects have been implemented within the Ventura Watershed and the project does not rely on new technology.
		Points	5	
		Land Acquisition	Required, not started and/or potential eminent domain	Access to perform field assessment tasks is required. Easements or access agreements to be secured with property owners
		Points	1	
		Dependencey on Other Projects	dependent on other unbuilt	Not dependent on other projects to implement. However, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter, that lower groundwater elevations within the Shallow Alluvial Aquifer.
		Points	5	
		Project Lifespan	>20 years	Project lifespan is indefinite, with annual O&M costs to ensure long-term removal.
		Points	5	
	Cost & Funding	Water Cost	<$500 / AF	See cost estimation below.
		Points	20	
		Funding Match for Construction	No Match	This project would be funded through the Basin assessment. FCGMA anticipates pursuing grant funding for this, as it becomes available.
		Points	1	
		O&M Funding	No funding identified	O&M would be funded through the Basin assessment.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Collaboration with water rights holders may be required to develop access agreements for initial Arundo removal and O&M.
		Points	0	
		Indicators	mitigate two	This project is expected to suport groundwater quality, level, and storage management within the ELPMA.
		Points	15	

Appendix B
Project Scoring Matrix

Purchase of Imported Water from CWMD for Basin Replenishment	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	500 to <2500 AFY	For the GSP, it was assumed that 1,762 AFY of CMWD water would be purchased and delivered in the WLPMA to ZMWC and VCWWD-19. FCGMA assumes that this same volume would be available for this Project.
		Points	10	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	No additional supporting information has been developed since the GSP
		Points	5	
	Timing / Feasibility	Project Implementation Timeframe	Can be operational in 5 years or less	Project would use existing delivery infrastructure. ZMWC pipeline improvements, which are underway, are required to fully utilize the water provided through this project. Implementation timeline is ultimately contingent on funding availability and negotiations between FCGMA, ZMWC, and VCWWD-19.
		Points	20	
		Development Phase	60% or greater engineering design	This project would re-establish a program that operated within the LPV between 1998 and 2005.
		Points	5	
		Status of Approvals, Permits, and Environmental Review	Permitting and CEQA/ environmental review complete	Permitting and CEQA is not required to implement this project.
		Points	5	
		Project Complexity	Low complexity, uses readily available proven technology	Project uses existing infrastructure and was successfully implemented between 1995 and 2008.
		Points	5	
		Land Acquisition	Not required or all acquisitions an/or easements complete	Project uses existing infrastructure. No additional land acquisition or easements are required.
		Points	5	
		Dependencey on Other Projects	dependent on other unbuilt	Project is not depened on other unbuilt projects. CMWD has indicated that there is sufficeint water supplies to implement this project at a variety of scales in most years.
		Points	5	
		Project Lifespan	>20 years	During development of the GSP, CMWD indicates that this Project lifespan would exceed 50 years.
		Points	5	
	Cost & Funding	Water Cost	$1000 to $2000 /AF	2024 Tier 1 rate for CMWD water is $1,730/AF.
		Points	10	
		Funding Match for Construction	No Match	No additional funding sources have been identified.
		Points	1	
		O&M Funding	No funding identified	CMWD O&M costs for delivering water is included in the Tier 1 pricing structure. Potential O&M costs for water purveryors infrastructure is not known.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Coordination is required between FCGMA, CMWD, and participating water purveyors.
		Points	0	
		Indicators	mitigate two	Supports groundwater elevation and storage management within the WLPMA.
		Points	15	

Appendix B
Project Scoring Matrix

Arroyo Las Posas Storm Water Capture and Recharge	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	500 to <2500 AFY	VCWWD-1 estimates that this project will provide an additional 2,000 AFY of recharge to the ELPMA.
		Points	10	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	VCWWD-1 has undertaken significant efforts to advance this project, including conducting geophysical surveys/investigations to help design their recharge basins and performing hydrologic modeling to estimate the volume of storm flows that would be available for diversion. However, no groundwater modeling has been conducted to characterize the storage capacity of the ELPMA and volume of recharged water that remains in the ELPMA
		Points	5	
	Timing / Feasibility	Project Implementation Timeframe	Can be operational by 2040	VCWWD-1 anticipates that this project could be constructed by June 30, 2027. Documentation provided by VCWWD indicates that the feasibility study will not be completed until March 30, 2025. No construction timeline was provided.
		Points	10	
		Development Phase	FS in progress, project well defined	
		Points	2	VCWWD-1 anticipates completing the Feasibility Study by March 30, 2025.
		Status of Approvals, Permits, and Environmental Review	Underway and approvals expected < 3 years	VCWWD-1 has not started the permitting process, but understands that coordination with CDFW, RWQCB, ACOE, and VCWPD will be required. VCWWD anticipates that permitting will take 1 year.
		Points	3	
		Project Complexity	Moderately Complex	The project does not employ new or novel technologies, but construction of the project is moderately complex, and includes construction of diversion and percolation facilities (pipelines, pumping stations, and a fish ladder).
		Points	3	
		Land Acquisition	Not required or all acquisitions an/or easements complete	
		Points	5	VCWWD-1 indicates that no land acquisitions or easements are required.
		Dependencey on Other Projects	dependent on other unbuilt	Project does not depend on other projects as it will divert water from Arroyo Simi-Las Posas during storm flow events and recharge the ELPMA with the diverted water. Overall increase in sustainable yield / volume of recharged water may be impacted by implementation of other projects (e.g., Desalter) that increases the available storage in the southern ELPMA.
		Points	5	
		Project Lifespan	>20 years	
		Points	5	VCWWD-1 anticipates a 25 year project lifespan.
	Cost & Funding	Water Cost	>$3000 / AF	has not provided estimates of O&M costs. Because of this, total water costs associated with the Project cannot be calculated and, therefore, have been assigned a value of ">$3,000/AF" to reflect uncertainty in overall Project costs.
		Points	1	
		Funding Match for Construction	No Match	
		Points	1	No additional funding sources have been identified.
		O&M Funding	No funding identified	
		Points	1	No funding match for O&M has been identified.
	Additional Benefits	Collaboration / Participation Required	Yes	
		Points	0	Collaboration between VCWWD-1, VCWPD, and FCGMA will be required.
		Indicators	mitigate two	
		Points	15	Supports groundwater elevation and storage management within the WLPMA.

Appendix B
Project Scoring Matrix

Moorpark Desalter	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	500 to <2500 AFY	VCWWD-1 estimates that this project will provide an additional 9,000 AFY of additional water supply to the ELPMA. Modeling conducted in 2016 indicates that operation of the desalter wells at 6,270 AFY would induce an additional 2,200 AFY of recharge to the ELPMA. Therefore, FCGMA believes that 2,200 AFY is a more appropriate estimate for the increase in sustainable yield associated with this project
		Points	10	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Initial feasibility study supporting estimate	VCWWD-1 conducted feasiblity numerical groundwater flow modeling in 2016 to support an initial assessment of the proposed desalter. Additional modeling would be required to evaluate the effects of the desalter under different management scenarios to characterize project benefits and sustainable yield increase.
		Points	15	
	Timing / Feasibility	Project Implementation Timeframe	May be operational by 2040, but uncertain	No feasibility study or design has been completed for this project.
		Points	5	
		Development Phase	Conceptual - no feasibility or design, project not well defined	No feasibility study or design has been completed for this project.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	VCWWD-1 anticipates that CEQA and NEPA will be required, but the specific permits and regulatory requirements have not been identified.
		Points	1	
		Project Complexity	Moderately Complex	The project does not employ new technology. However, the project would require construction of a desalter well field, treatment system, and conveyance infrastructure.
		Points	3	
		Land Acquisition	Required, not started and/or potential eminent domain	Land acquisition / easements will be identified through an initial feasibility study.
		Points	1	
		Dependencey on Other Projects	dependent on other unbuilt	Project does not depend on other projects, but could impact the efficacy of other projects that aim to maintain flows in Arroyo Simi-Las Posas by lowering the water table in southern East Las Posas.
		Points	5	
		Project Lifespan	>20 years	VCWWD-1 anticipates a 25 year project lifespan.
		Points	5	
	Cost & Funding	Water Cost	>$3000 / AF	has not provided estimates of O&M costs. Because of this, total water costs associated with the Project cannot be calculated and, therefore, have been assigned a value of ">$3,000/AF" to reflect uncertainty in overall Project costs.
		Points	1	
		Funding Match for Construction	No Match	No additional funding sources have been identified.
		Points	1	
		O&M Funding	No funding identified	No funding match for O&M has been identified.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Collaboration between VCWWD-1 and FCGMA will be required. Additionally, it is anticipated that VCWWD-1 will need to coordinate with CMWD to dispose of desalter brine through CMWD's existing disposal infrastructure.
		Points	0	
		Indicators	mitigate	Supports groundwater level, storage, and quality management in southern ELPMA.
		Points	20	

Appendix B
Project Scoring Matrix

Arroyo Simi-Las Posas Water Acquisition	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	2500 to <5000 AFY	Maintenance of discharges to Arroyo Las Posas could increase the sustainable yield by more than 2,500 AFY, depending on the volume of SVWQCP discharges maintained in Arroyo Simi-Las Posas.
		Points	15	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Preliminary Design and / or modeling supporting estimate	Modeling conducted for the periodic GSP evaluations indicate that maintaining SVWQCP discharges may provide between 2,400 and 3,600 AFY of additional recharge to the ELPMA, compared to what was projected in FCGMA (2019). Additional modeling will need to be conducted when a final volume of discharges is agreed upon by both FCGMA, Water Rights Holders, and the City of Simi Valley.
		Points	20	
	Timing / Feasibility	Project Implementation Timeframe	May be operational by 2040, but uncertain	The project does not require new infrastructure, but will require negotation of real property (i.e. recycled water) pricing and availability. Final agreed upon terms are uncertain.
		Points	5	
		Development Phase	Conceptual - no feasibility or design, project not well defined	Additional modeling is recommended to characterize recharge benefits under a range of project scenarios.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	Discharges will need to comply with the City's NPDES permit and TMDL limits. Additional permitting is not anticipated for this project.
		Points	1	
		Project Complexity	Low complexity, uses readily available proven technology	Project does not involve new technology or infrastructure. Project is readily implementable once agreement is developed and finalized with the City of Simi Valley.
		Points	5	
		Land Acquisition	Not required or all acquisitions an/or easements complete	No additional land acquisition or easements are required.
		Points	5	
		Dependencey on Other Projects	dependent on other unbuilt and	The volume of water made available to this Project is dependent on the volume of water allocated for the Recycled Water Pipeline project. The full benefits from this project may also require implementation of the Arundo Removal project and Desalter for full benefits.
		Points	1	
		Project Lifespan	>20 years	Project lifespan will depend upon final negotiations.
		Points	5	
	Cost & Funding	Water Cost	<$500 / AF	
		Points	20	
		Funding Match for Construction	No Match	No construction is required.
		Points	1	
		O&M Funding	No funding identified	SVWQCP O&M will be managed by the City of Simi Valley
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Coordination and collaboration required with FCGMA and the City of Simi Valley.
		Points	0	
		Indicators	mitigate two	Supports groundwater level and storage management in the ELPMA.
		Points	15	

Appendix B
Project Scoring Matrix

Delivery of Recycled Water to Las Posas Users via Pipeline	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	2500 to <5000 AFY	In 2017, the City of Simi indicated approx. 3,000 AFY of RW would be available for delivery to Berylwood Heights MWC and Zone MWC via pipeline as part of this project.
		Points	15	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	The volume of RW available for delivery and use in lieu of groundwater is uncertain and will depend upon muliple factors, including: (i) the willingness of Zone MWC and / or Berylwood Heights MWC to use RW water with relatively high salinity, (ii) the volume of water acquired by FCGMA for discharge to Arroyo Simi Las Posas.
		Points	5	
	Timing / Feasibility	Project Implementation Timeframe	May be operational by 2040, but uncertain	The project requires new infrastructure and the negotation of real property (i.e. recycled water) pricing and availability. Final agreed upon terms and infrastructure requirements are uncertain.
		Points	5	
		Development Phase	Conceptual - no feasibility or design, project not well defined	No feasibility has been conducted to evaluate infrastructure needs, current RW demands, and current RW availability.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	This project would require construction of new pump station and conveyance infrastructure. Permitting requirements to construct these facilities would be identified through an initial feasibility study.
		Points	1	
		Project Complexity	Moderately Complex	This project does not rely on new technology, but is technically complex because it will likely require multiple construction phases and depend on is contingent on negiotating RW availability and long-term demands
		Points	3	
		Land Acquisition	Required, not started and/or potential eminent domain	land acquisition and easement requirements will be identified through an initial feasibility study.
		Points	1	
		Dependencey on Other Projects	dependent on other unbuilt and	The volume of RW available for delivery via pipeline will be impacted by the volume of water discharged to Arroyo Simi-Las Posas.
		Points	1	
		Project Lifespan	>20 years	Not well defined.
		Points	5	
	Cost & Funding	Water Cost	$1000 to $2000 /AF	Infrastructure costs are based on estimates developed by Kennedy Jenks (2017). Assuming that recycled water price would remain less than 500/AF.
		Points	10	
		Funding Match for Construction	No Match	None identified. Project is conceptual.
		Points	1	
		O&M Funding	No funding identified	None identified. Project is conceptual.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Coordination is required between FCGMa, MWCs, and City of Simi Valley
		Points	0	
		Indicators	mitigate two	Supports groundwater level and storage management in the ELPMA.
		Points	15	

Appendix B
Project Scoring Matrix

In Lieu Deliveries to Northern ELPMA Feasibility Study	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	<500 AFY	
		Points	5	This project is a feasibility study and will not provide a new source of water to LPV.
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual Estimate - limited documentation	
		Points	10	Preliminary modeling conducted and presented to the FCGMA Board.
	Timing / Feasibility	Project Implementation Timeframe	Can be operational in 5 years or less	
		Points	20	FS can be completed within a 1-year timeframe
		Development Phase	Conceptual - no feasibility or design, project not well defined	
		Points	1	Not applicable.
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	
		Points	1	Permits required to implement this project will be identified through the FS.
		Project Complexity	Low complexity, uses readily available proven technology	
		Points	5	Low complexity paper study.
		Land Acquisition	Required, not started and/or potential eminent domain	
		Points	1	This is a feasibility study - no land acquisition required.
		Dependencey on Other Projects	dependent on other unbuilt	
		Points	5	Feasibility Study can be conducted independent of other projects..
		Project Lifespan	<5 years	
		Points	1	
	Cost & Funding	Water Cost	>$3000 / AF	Feasibility Study does not provide a new source of water supply to the LPV. A cost of "$3,000/AF" was included here to reflect uncertainty in the final project pricing.
		Points	1	
		Funding Match for Construction	No Match	
		Points	1	No Match.
		O&M Funding	No funding identified	
		Points	1	No funding identified.
	Additional Benefits	Collaboration / Participation Required	No.	
		Points	0	Collaboration is not anticipated to conduct the Feasibility Study.
		Indicators	address	Information developed through this study will inform the design of a project that may help to manage groundwater levels and storage.
		Points	5	

Appendix B
Project Scoring Matrix

Developing a Least Cost Acquisition Program	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	<500 AFY	Reduced demand may vary on an annual basis. Demand reduction will be characterized through an initial study.
		Points	5	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	Study has not been initiated.
		Points	5	
	Timing / Feasibility	Project Implementation Timeframe	Can be operational in 5 years or less	Project does not require any new infrastructure and Watermaster has authority under the Judgment to levy fees that could be used to purchase allocation.
		Points	20	
		Development Phase	Conceptual - no feasibility or design, project not well defined	Project is conceptual and will be further defined through this study.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	Permits not required.
		Points	1	
		Project Complexity	Low complexity, uses readily available proven technology	
		Points	5	
		Land Acquisition	Not required or all acquisitions an/or easements complete	
		Points	5	
		Dependencey on Other Projects	dependent on other unbuilt	
		Points	5	
		Project Lifespan	<5 years	
		Points	1	
	Cost & Funding	Water Cost	<$500 / AF	It is anticipated that the LCA will be based on assessment fees, however, final costs will be determined through this study.
		Points	20	
		Funding Match for Construction	No Match	
		Points	1	
		O&M Funding	No funding identified	
		Points	1	
	Additional Benefits	Collaboration / Participation Required	No.	
		Points	0	
		Indicators	mitigate one	Information developed through this study will help to define a program that supports groundwater level and storage management.
		Points	10	

Appendix B
Project Scoring Matrix

Construction of Additional Dedicated Monitoring Wells	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	<500 AFY	
		Points	5	Project will not increase water supplies.
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	
		Points	5	Not applicable.
	Timing / Feasibility	Project Implementation Timeframe	Can be operational in 5 years or less	
		Points	20	Project can be implemented within a 2-year timeframe following commitment of funds.
		Development Phase	Conceptual - no feasibility or design, project not well defined	
		Points	1	Initial planning and well siting study is required to identify suitable locations.
		Status of Approvals, Permits, and Environmental Review	Underway and approvals expected <1 year	
		Points	4	Approvals by VCWPD expected to take less than 1 year.
		Project Complexity	Low complexity, uses readily available proven technology	
		Points	5	Low complexity - FCGMA has recently installed dedicated monitoring wells in the Oxnard Subbasin and Pleasant Valley Basin.
		Land Acquisition	Required, not started and/or potential eminent domain	
		Points	1	Easements are likely required.
		Dependencey on Other Projects	dependent on other unbuilt	
		Points	5	Not dependent on other projects.
		Project Lifespan	>20 years	
		Points	5	>20 year lifespan.
	Cost & Funding	Water Cost	>$3000 / AF	Project does not provide new water supply and, therefore, was assigned a value of ">$3,000/AF"
		Points	1	
		Funding Match for Construction	No Match	
		Points	1	None identified
		O&M Funding	No funding identified	
		Points	1	None identified
	Additional Benefits	Collaboration / Participation Required	No.	
		Points	0	None identified
		Indicators	address	
		Points	5	None identified

Appendix B
Project Scoring Matrix

Installation of Pressure Transducers	Criteria			Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	<500 AFY	
		Points	5	Project will not increase water supplies.
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	
		Points	5	Not applicable.
	Timing / Feasibility	Project Implementation Timeframe	Can be operational in 5 years or less	
		Points	20	Project can be implemented within a 18=month timeframe following commitment of funds.
		Development Phase	Conceptual - no feasibility or design, project not well defined	
		Points	1	Initial planning and coordination required to better define wellhead modification requirements.
		Status of Approvals, Permits, and Environmental Review	Underway and approvals expected <1 year	
		Points	4	Not applicable.
		Project Complexity	Low complexity, uses readily available proven technology	
		Points	5	Low complexity.
		Land Acquisition	Required, not started and/or potential eminent domain	
		Points	1	Access agreements likely required to modify wellheads and equip wells with pressure transducers.
		Dependencey on Other Projects	dependent on other unbuilt	
		Points	5	Not dependent on other projects.
		Project Lifespan	>20 years	
		Points	5	>20 year lifespan.
	Cost & Funding	Water Cost	>$3000 / AF	Project does not provide new water supply and, therefore, was assigned a value of ">$3,000/AF"
		Points	1	
		Funding Match for Construction	No Match	
		Points	1	None identified
		O&M Funding	No funding identified	
		Points	1	None identified
	Additional Benefits	Collaboration / Participation Required	No.	
		Points	0	None identified
		Indicators	address	
		Points	5	None identified

Appendix C

Schedule for Implementing the Basin Optimization Projects

Appendix C

Schedule to Implement the Basin Optimization Projects

Project Number	Project Name	Dates		Duration		2025				2026				2027				2028				2029			
		Start	Stop	Days	Months	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
	Adoption of Basin Optimization Plan (Tentative)	**3/26/2025**																							
	Water Supply Projects																								
	Arroyo Simi-Las Posas Arundo Removal	3/26/2025	2/28/2029	1435	48																				
	Phase I: Work Plan Development	*3/26/2025*	*2/28/2027*	*704*	*23*																				
1	*Phase II: Arundo Removal*	*3/1/2027*	*2/28/2029*	*730*	*24*																				
5	Arroyo Simi-Las Posas Water Acquisition	3/26/2025	12/31/2029	1741	58																				
2	Purchase of Imported Water from CMWD	3/26/2025	12/31/2029	1741	58																				
	Feasibility Studies and Data Gap Projects																								
8	Developing a Least Cost Acquistion Program	3/26/2025	7/15/2026	476	16																				
4	Moorpark Desalter Project	3/26/2025	7/15/2026	476	16																				
	Arroyo Las Posas Storm Water Capture	11/22/2024	6/30/2027	950	32																				
	Phase I: Feasibility Study	11/22/2024	6/30/2025	220	7																				
3	*Phase II: Project Construction*	6/30/2025	6/30/2027	730	24																				
6	Delivery of Recycled Water to Las Posas Users via Pipeline	1/1/2027	12/31/2028	730	24																				
	Construction of Dedicated Monitoring Wells	3/26/2026	12/31/2029	1376	46																				
	Phase I: Well Siting Evaluation and Bid Documentation	*3/26/2025*	*9/30/2025*	*188*	*6*																				
9	*Phase II: Well Contrustion*	*1/1/2026*	*6/30/2027*	*545*	*18*																				
10	Installation of Pressure Transducers	3/26/2026	9/30/2027	553	18																				
7	In Lieu Deliveries to Northern ELPMA	1/1/2027	12/31/2027	364	12																				

Legend

- Active Project Implementation or Construction
- Agency Activities (Easements, Consultant / Contractor Procurement, Water Pricing Negotiations, Coordination with Agencies, Water Rights Holders, or Land Owners)
- Operation and Maintenance

Appendix D

5-Year Budget for Implementing the Basin Optimization Projects

Appendix D

5-Year Basin Optimization Projects Budget

Project Number	Project Name	2025 Q1	Q2	Q3	Q4
	Adoption of Basin Optimization Plan				
Water Supply Projects					
	Arroyo Simi-Las Posas Arundo Removal				
	Phase I: Work Plan Development			$ 57,200.00	$ 57,200.00
1	*Phase II: Arundo Removal*				
5	Arroyo Simi-Las Posas Water Acquisition[a]				
2	Purchase of Imported Water from CMWD				
	Subtotal		*$ -*	*$ 57,200.00*	*$ 57,200.00*
Feasibility Studies and Data Gap Projects					
8	Developing a Least Cost Acquistion Program[b]				$ 25,000.00
4	Moorpark Desalter Project				$ 50,000.00
	Arroyo Las Posas Storm Water Capture				
	Phase I: Feasibility Study		$ -	$ -	
3	*Phase II: Project Construction*				$ 500,000.00
6	Delivery of Recycled Water to Las Posas Users via Pipeline				
	Construction of Dedicated Monitoring Wells				
	Phase I: Well Siting Evaluation and Bid Documentation		$ 25,000.00	$ 25,000.00	
9	*Phase II: Well Contrustion*[c]				
10	Installation of Pressure Transducers				$ 23,500.00
7	In Lieu Deliveries to Northern ELPMA				
	Subtotal		*$ 25,000.00*	*$ 25,000.00*	*$ 598,500.00*
	Total		**$ 25,000.00**	**$ 82,200.00**	**$ 655,700.00**

Notes:

Project costs do not include Agency costs (staff, legal, etc.) or costs for easements, land acquisition, or access agreements.

[a] Assumes a price of $100/AF and an annual purchase of 4,700 AFY from the City of Simi Valley

[b] Long-term costs are uncertain and will be defined through the initial study to develop the program.

[c] Assumes construction of six dedicated monitoring wells

Active Project Implementation or Construction

Agency Activities (Easements, Consultant / Contractor Procurement, Water Pricing Negotiations, Coordination)

Operation and Maintenance

Appendix D

5-Year Basin Optimization Projects Budget

Project Number	Project Name	2026 Q1	2026 Q2	2026 Q3	2026 Q4
	Adoption of Basin Optimization Plan				
Water Supply Projects					
	Arroyo Simi-Las Posas Arundo Removal				
	Phase I: Work Plan Development	$ 57,200.00	$ 57,200.00	$ 57,200.00	$ 57,200.00
1	*Phase II: Arundo Removal*				
5	Arroyo Simi-Las Posas Water Acquisition[a]	$ 117,500.00	$ 117,500.00	$ 117,500.00	$ 117,500.00
2	Purchase of Imported Water from CMWD	$ 865,000.00	$ 865,000.00	$ 865,000.00	$ 865,000.00
	Subtotal	*$ 1,039,700.00*	*$ 1,039,700.00*	*$ 1,039,700.00*	*$ 1,039,700.00*
Feasibility Studies and Data Gap Projects					
8	Developing a Least Cost Acquistion Program[b]	$ 25,000.00	$ 25,000.00	$ 25,000.00	
4	Moorpark Desalter Project	$ 50,000.00	$ 50,000.00	$ 50,000.00	
	Arroyo Las Posas Storm Water Capture				
	Phase I: Feasibility Study				
3	*Phase II: Project Construction*	$ 500,000.00	$ 500,000.00	$ 500,000.00	$ 500,000.00
6	Delivery of Recycled Water to Las Posas Users via Pipeline				
	Construction of Dedicated Monitoring Wells				
	Phase I: Well Siting Evaluation and Bid Documentation				
9	*Phase II: Well Contrustion*[c]	$ 550,000.00	$ 550,000.00	$ 550,000.00	$ 550,000.00
10	Installation of Pressure Transducers	$ 23,500.00	$ 23,500.00	$ 23,500.00	$ 23,500.00
7	In Lieu Deliveries to Northern ELPMA				
	Subtotal	*$ 1,148,500.00*	*$ 1,148,500.00*	*$ 1,148,500.00*	*$ 1,073,500.00*
	Total	**$ 2,188,200.00**	**$ 2,188,200.00**	**$ 2,188,200.00**	**$ 2,113,200.00**

Notes:

Project costs do not include Agency costs (staff, legal, etc.) or costs for easements, land acquisition, or access agreements.

[a] Assumes a price of $100/AF and an annual purchase of 4,700 AFY from the City

[b] Long-term costs are uncertain and will be defined through the initial study to de

[c] Assumes construction of six dedicated monitoring wells

Active Project Implementation or Construction

Agency Activities (Easements, Consultant / Contractor Procurement, Water Pri

Operation and Maintenance

Appendix D

5-Year Basin Optimization Projects Budget

Project Number	Project Name	2027 Q1	2027 Q2	2027 Q3	2027 Q4
	Adoption of Basin Optimization Plan				
Water Supply Projects					
	Arroyo Simi-Las Posas Arundo Removal				
	Phase I: Work Plan Development	$ 57,200.00			
1	*Phase II: Arundo Removal*		$ 1,137,500.00	$ 1,137,500.00	$ 1,137,500.00
5	Arroyo Simi-Las Posas Water Acquisition[a]	$ 117,500.00	$ 117,500.00	$ 117,500.00	$ 117,500.00
2	Purchase of Imported Water from CMWD	$ 865,000.00	$ 865,000.00	$ 865,000.00	$ 865,000.00
	Subtotal	*$ 1,039,700.00*	*$ 2,120,000.00*	*$ 2,120,000.00*	*$ 2,120,000.00*
Feasibility Studies and Data Gap Projects					
8	Developing a Least Cost Acquistion Program[b]				
4	Moorpark Desalter Project				
	Arroyo Las Posas Storm Water Capture				
	Phase I: Feasibility Study				
3	*Phase II: Project Construction*	$ 500,000.00	$ 500,000.00	$ 500,000.00	
6	Delivery of Recycled Water to Las Posas Users via Pipeline	$ 50,000.00	$ 50,000.00	$ 50,000.00	$ 50,000.00
	Construction of Dedicated Monitoring Wells				
	Phase I: Well Siting Evaluation and Bid Documentation				
9	*Phase II: Well Contrustion*[c]	$ 550,000.00	$ 550,000.00		
10	Installation of Pressure Transducers	$ 23,500.00			
7	In Lieu Deliveries to Northern ELPMA	$ 25,000.00	$ 25,000.00	$ 25,000.00	$ 25,000.00
	Subtotal	*$ 1,148,500.00*	*$ 1,125,000.00*	*$ 575,000.00*	*$ 75,000.00*
	Total	**$ 2,188,200.00**	**$ 3,245,000.00**	**$ 2,695,000.00**	**$ 2,195,000.00**

Notes:

Project costs do not include Agency costs (staff, legal, etc.) or costs for easements, land acquisition, or access agreements.

[a] Assumes a price of $100/AF and an annual purchase of 4,700 AFY from the City

[b] Long-term costs are uncertain and will be defined through the initial study to de

[c] Assumes construction of six dedicated monitoring wells

Active Project Implementation or Construction

Agency Activities (Easements, Consultant / Contractor Procurement, Water Pri

Operation and Maintenance

Appendix D

5-Year Basin Optimization Projects Budget

Project Number	Project Name	2028 Q1	2028 Q2	2028 Q3	2028 Q4
	Adoption of Basin Optimization Plan				
Water Supply Projects					
	Arroyo Simi-Las Posas Arundo Removal				
	Phase I: Work Plan Development				
1	*Phase II: Arundo Removal*	$ 1,137,500.00	$ 1,137,500.00	$ 1,137,500.00	$ 1,137,500.00
5	Arroyo Simi-Las Posas Water Acquisition[a]	$ 117,500.00	$ 117,500.00	$ 117,500.00	$ 117,500.00
2	Purchase of Imported Water from CMWD	$ 865,000.00	$ 865,000.00	$ 865,000.00	$ 865,000.00
	Subtotal	*$ 2,120,000.00*	*$ 2,120,000.00*	*$ 2,120,000.00*	*$ 2,120,000.00*
Feasibility Studies and Data Gap Projects					
8	Developing a Least Cost Acquistion Program[b]				
4	Moorpark Desalter Project				
	Arroyo Las Posas Storm Water Capture				
	Phase I: Feasibility Study				
3	*Phase II: Project Construction*				
6	Delivery of Recycled Water to Las Posas Users via Pipeline	$ 50,000.00	$ 50,000.00	$ 50,000.00	$ 50,000.00
	Construction of Dedicated Monitoring Wells				
	Phase I: Well Siting Evaluation and Bid Documentation				
9	*Phase II: Well Contrustion*[c]				
10	Installation of Pressure Transducers				
7	In Lieu Deliveries to Northern ELPMA				
	Subtotal	*$ 50,000.00*	*$ 50,000.00*	*$ 50,000.00*	*$ 50,000.00*
	Total	**$ 2,170,000.00**	**$ 2,170,000.00**	**$ 2,170,000.00**	**$ 2,170,000.00**

Notes:

Project costs do not include Agency costs (staff, legal, etc.) or costs for easements, land acquisition, or access agreements.

[a] Assumes a price of $100/AF and an annual purchase of 4,700 AFY from the City

[b] Long-term costs are uncertain and will be defined through the initial study to de

[c] Assumes construction of six dedicated monitoring wells

Active Project Implementation or Construction

Agency Activities (Easements, Consultant / Contractor Procurement, Water Pri

Operation and Maintenance

Appendix D

5-Year Basin Optimization Projects Budget

Project Number	Project Name	2029 Q1	2029 Q2	2029 Q3	2029 Q4
	Adoption of Basin Optimization Plan				
Water Supply Projects					
	Arroyo Simi-Las Posas Arundo Removal				
	Phase I: Work Plan Development				
1	*Phase II: Arundo Removal*	$ 1,137,500.00	$ 670,000.00	$ 670,000.00	$ 670,000.00
5	Arroyo Simi-Las Posas Water Acquisition[a]	$ 117,500.00	$ 117,500.00	$ 117,500.00	$ 117,500.00
2	Purchase of Imported Water from CMWD	$ 865,000.00	$ 865,000.00	$ 865,000.00	$ 865,000.00
	Subtotal	*$ 2,120,000.00*	*$ 1,652,500.00*	*$ 1,652,500.00*	*$ 1,652,500.00*
Feasibility Studies and Data Gap Projects					
8	Developing a Least Cost Acquistion Program[b]				
4	Moorpark Desalter Project				
	Arroyo Las Posas Storm Water Capture				
	Phase I: Feasibility Study				
3	*Phase II: Project Construction*				
6	Delivery of Recycled Water to Las Posas Users via Pipeline				
	Construction of Dedicated Monitoring Wells				
	Phase I: Well Siting Evaluation and Bid Documentation				
9	*Phase II: Well Contrustion*[c]				
10	Installation of Pressure Transducers				
7	In Lieu Deliveries to Northern ELPMA				
	Subtotal	*$ -*	*$ -*	*$ -*	*$ -*
	Total	**$ 2,120,000.00**	**$ 1,652,500.00**	**$ 1,652,500.00**	**$ 1,652,500.00**

Notes:

Project costs do not include Agency costs (staff, legal, etc.) or costs for easements, land acquisition, or access agreements.

[a] Assumes a price of $100/AF and an annual purchase of 4,700 AFY from the City

[b] Long-term costs are uncertain and will be defined through the initial study to de

[c] Assumes construction of six dedicated monitoring wells

Active Project Implementation or Construction

Agency Activities (Easements, Consultant / Contractor Procurement, Water Pri

Operation and Maintenance

Appendix D

5-Year Basin Optimization Projects Budget

Project Number	Project Name		Total Project Costs
	Adoption of Basin Optimization Plan		
Water Supply Projects			
	Arroyo Simi-Las Posas Arundo Removal		
	Phase I: Work Plan Development	$	400,400.00
1	*Phase II: Arundo Removal*	$	11,110,000.00
5	Arroyo Simi-Las Posas Water Acquisition[a]	$	1,880,000.00
2	Purchase of Imported Water from CMWD	$	13,840,000.00
	Subtotal	$	27,230,400.00
Feasibility Studies and Data Gap Projects			
8	Developing a Least Cost Acquistion Program[b]	$	100,000.00
4	Moorpark Desalter Project	$	200,000.00
	Arroyo Las Posas Storm Water Capture	$	-
	Phase I: Feasibility Study	$	-
3	*Phase II: Project Construction*	$	4,000,000.00
6	Delivery of Recycled Water to Las Posas Users via Pipeline	$	400,000.00
	Construction of Dedicated Monitoring Wells	$	-
	Phase I: Well Siting Evaluation and Bid Documentation	$	50,000.00
9	*Phase II: Well Contrustion*[c]	$	3,300,000.00
10	Installation of Pressure Transducers	$	141,000.00
7	In Lieu Deliveries to Northern ELPMA	$	100,000.00
	Subtotal	*$*	*8,191,000.00*
	Total	**$**	**35,421,400.00**

Notes:

Project costs do not include Agency costs (staff, legal, etc.) or costs for easements, land acquisition, or access agreements.

[a] Assumes a price of $100/AF and an annual purchase of 4,700 AFY from the City

[b] Long-term costs are uncertain and will be defined through the initial study to de

[c] Assumes construction of six dedicated monitoring wells

Active Project Implementation or Construction

Agency Activities (Easements, Consultant / Contractor Procurement, Water Pri

Operation and Maintenance

Attachment 3

Watermaster Response Report – TAC Recommendation Report, Draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: December 02, 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, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Technical Advisory Committee (TAC) on the Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin dated August 2024. Watermaster's request was in an August 26, 2024, memorandum to the TAC. The TAC discussed and developed its recommendation report at the September 17, 2024, October 2, 2024, and October 15, 2024, TAC meetings.

TAC's October 10, 2024, recommendation report included five comments / recommendations and an attachment with 179 comments by each of the TAC members on specific sections of the draft Periodic Evaluation. The five comments / recommendations are listed below, followed by Watermaster staff's responses. Watermaster staff's responses to the 179 specific recommendations are attached.

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 performing 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.

Response to Comment / Recommendation 1:
The Watermaster agrees that the monitoring in LPVB can be improved. The Watermaster will work with partner agencies to formalize agreements to monitor critical wells and will continue to pursue funding mechanisms to fill data gaps and install additional dedicated monitoring wells, if possible.

1. The GSP Evaluation text has been revised where appropriate to reflect limited and inconsistent monitoring data. Revisions to specific text passages in response to TAC's detailed comments are documented in the attached table.
2. The Watermaster will work with partner agencies to establish agreements to ensure appropriate data is collected. If agreements cannot be reached to assure appropriate data collection at one or more key wells, Watermaster will evaluate monitoring these wells with Watermaster staff.
3. Watermaster notes TAC's recommendation to fast-track the monitoring-well and instrumentation projects identified in the GSP and Draft GSP Evaluation. The Watermaster plans to develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments. Watermaster staff continues to explore opportunities for grant funding that can be used to install dedicated monitoring wells and fill data gaps and plans to request Technical Support Services from DWR if alternative funding sources cannot be secured.
4. The overall monitoring network includes all wells that are screened in individual aquifers, in conformance with SGMA. This includes private production wells. As discussed in response to recommendation 2, Watermaster will take steps to improve routine groundwater monitoring.

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.

Response to Comment / Recommendation 2:
Watermaster notes TAC's comments on the change in the boundary condition along the Somis Fault in the WLPMA portion of the Coastal Plain Model. UWCD developed and maintains the Coastal Plan Model and made this change, as was identified in the draft GSP Evaluation. UWCD is currently working on the supplemental documentation to cover the changes made since the GSP version of the model. As of the time this response report was prepared, UWCD had not yet finalized this supplemental documentation.

Water budgets are provided for each management area in the draft GSP Evaluation. These budgets are similar to those presented in the GSP, and changes to the Coastal Plain Model do not manifest in large changes to the sustainable yield estimate of the WLPMA. Watermaster will continue to work with the TAC to improve the understanding of the potential impact of management actions and projects in the LPVB.

The current models used for the WLPMA and ELPMA are the best available tools for assessing the impacts of projects and management actions. The TAC rightly points to areas where these models can be improved for future use.

1. Watermaster has forwarded TAC's recommendation to UWCD. UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this response report was prepared, UWCD had not yet provided a date when the supplemental documentation will be made available.
2. Please see response above.
3. Water budgets are provided for each management area. These budgets are similar to those presented in the GSP, and changes to the Coastal Plain Model do not manifest in large changes to the sustainable yield estimate of the WLPMA. Watermaster will continue to work with the TAC to improve the understanding of the potential impact of management actions and projects in the LPVB.
4. Watermaster notes and thanks TAC for its comment.

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 where 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.

Response to Comment / Recommendation 3:
The connection between the WLPMA and the Oxnard Subbasin was established with rigorous scientific evaluation and review through the Technical Advisory Group prior to SGMA. The evaluation does not seek to quantify the impact of pumping in one basin on another. Rather, it follows SGMA and the GSP by acknowledging the interconnectedness of the Oxnard Subbasin and the WLPMA. The WLPMA sustainability yield was estimated with appropriate scientific rigor through numerical flow modeling.

Watermaster agrees that TAC provides good recommendations for modeling scenarios that could be conducted in the future.

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.

Response to Comment / Recommendation 4:
Watermaster agrees with TAC's comment / recommendation. The GSP Evaluation text has been clarified and revised, where appropriate, to further explain the responses to DWR's recommended corrective actions. The revised text is responsive to DWR's recommended corrective actions.

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.

Response to Comment / Recommendation 5:
The draft GSP Evaluation text was reviewed and revised where appropriate in response to TAC's comment / recommendation. The text and tables of the GSP evaluation have been revised, where appropriate, in response to TAC comments provided in the table attached to the recommendation report. The detailed responses to the comments are listed in the attached table.

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	Watermaster Response
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.	Noted. The text and tables of the GSP evaluation have been revised, where appropriate, in response to TAC comments provided in the table attached to the recommendation report. The detailed responses to the comments in the table are listed below.
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.	The Watermaster agrees that the monitoring in LPVB can be improved. The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells and fill data gaps, if possible.
BB-TC-3a	Bryan Bondy	Technical	--	ES-2	3rd paragraph	*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.*	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.	Figure 2-4 only shows the water level changes in the key wells relative to groundwater elevations in 2015, the minimum thresholds, and measurable objectives. Groundwater elevations are measured in wells throughout the monitoring network. The quoted sentence is based on figures 2-7 and 2-8
BB-TC-3b	Bryan Bondy	Technical	--	ES-2	3rd paragraph	*In contrast, groundwater elevations in the eastern part of the WLPMA were lower in water year 2024 than they were in water year 2015.*	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.	See above response.
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.	Text has been revised.
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): • 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)	Noted. These areas are identified in the GSP. FCGMA will investigate the inclusion of the recommended wells as RMPs.
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.	Noted. The project description was solicited as part of the FCGMA Board project prioritization process that commenced prior to formation of the TAC. The project description provided by the project proponent was used to incorporate the project into the model for the GSP evaluation. Revisions to the project description are planned for the Basin Optimization Plan.
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	*The depth and groundwater production rates from the wells in this area indicate that they are agricultural wells…*	This statement is incorrect. 10 of the 22 wells are Calleguas ASR wells.	Text has been revised
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.	Table values were revised.
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 (Glotfelty, 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.	The FCGMA board determined in the GSP that a loss of 20% or more of storage beyond the 2015 level in critical areas of the ELPMA constitutes a significant and unreasonable impact to the area. The analysis in the draft GSP Evaluation evaluates well screens and projected water levels, but not significant effects to production. The column label in Table 2-1 has been revised to "Projected Water Level Below 50% of the Well Screen." The previous label incorrectly used the word "production."
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.	The Watermaster is a member of the Calleguas ASR Study Group that will develop a Calleguas ASR Project Operations Plan. Future evaluations will include information from this effort.
BB-TC-10	Bryan Bondy	Technical	GDEs	34	Section 2.7.2	*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.*	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.	Text has been added to note this.

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	Watermaster Response
BB-TC-11	Bryan Bondy	Technical	Arroyo Simi-Las Posas Water Acquisition Project	40	Section 3.1.2.3.2 and Table 3-1	*Text states the project "will make additional water available to recharge" and table states the project benefit will be "increase in sustainable yield."*	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.	Revised.
BB-TC-12	Bryan Bondy	Technical	--	43	Section 3.2.2	*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."*	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?	Text has been revised to remove the reference to reducing groundwater demands.
BB-TC-13	Bryan Bondy	Technical	New Data for ELPMA	51	Section 4.1.1.1	*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.*	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.	Text has been added to the hydrogeologic conceptual model section noting the construction of these wells.
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.	Text has been revised.
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.	Noted. Thank you for your comment.
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.	The term "loss" has been replaced in this section by the term "difference" to remove an unintended value judgement in the draft.
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.	Noted. The text has been revised to include this observation. The minimum threshold may need to be shifted in WLPMA, as well as at the coast, if EBB is implemented.
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.	Table was added.
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.	Text has been revised.
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.	Text has been revised.
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.	Text has been revised.

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BB-TC-22	Bryan Bondy	Technical	Revisions to CMWD Monitoring Network	95	Section 6.1; Table 6-2	*Four of the wells have been removed from the monitoring network because they were either destroyed or CMWD had recurring access issues.*	Calleguas has not had access issues. The following are clarifications concerning the wells listed in Table 6-2: • 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. Calleguas has added its three multilevel groundwater monitoring wells to its monitoring network.	These suggestions have been incorporated into the text
BB-TC-23	Bryan Bondy	Technical	Change in CMWD Monitoring Schedule	96	Table 6-3	--	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. Well 02N19W06F01S is an agricultural well, not a monitoring well. Well 02N20W09Q08S is a monitoring well, not a municipal well.	Table has been changed and text has been revised.
BB-TC-24	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*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.*	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.	Text has been revised to recognize where transducers are already installed.
BB-TC-25	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Additionally, as funding becomes available, pressure transducers should be added to wells in the groundwater monitoring network.*	It is noted that Calleguas and VCWWD already have transducers installed in all the wells in their monitoring network.	Text has been revised to recognize where transducers are already installed.
BB-TC-26	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*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.*	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.	Table has been changed and text has been revised.
BB-TC-27	Bryan Bondy	Technical	Data Gaps	97	Section 6.2	--	Consideration should be given to reevaluating data gaps in consultation with TAC after FCGMA staff have met and conferred with the monitoring entities.	Noted. This suggestion has been added to the list of coordination activities to be performed in the upcoming years.
BB-TC-28a	Bryan Bondy	General Technical	Potential Additional Report Elements	--	--	--	1.Consideration should be given to including groundwater level contour maps. Perhaps the annual report figures could becompiled into an appendix.	Noted. The focus of this evaluation is on the progress toward implementation. Contour maps are generated annually and included in the annual reports, which are available online at the FCGMA and DWR websites.
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 spatialdistribution of pumping in the management areas.	Noted. This is a good suggestion for incorporation into the annual reports.
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.	Text, figures, and tables have been QC'd.
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.	Figure has been revised
BB-EC-3	Bryan Bondy	Editorial	--	120	Figure 2-2	--	RMP/Key Well 35R02 is missing on Figure 2-2.	Figure has been revised
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).	Revised.

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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.	Noted. The intent of these figures is to summarize the status relative to the SMCs. The graphics are scaled to the difference between the MT and MO. This information has been added to the figures. Absolute change in groundwater level relative to the MT and MO is displayed in the hydrographs.
BB-EC-6	Bryan Bondy	Editorial	--	ES-4	1st paragraph	--	The values in this paragraph are incorrect: • 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).	WLPMA reference has been updated to 4,000 AFY more than the upper estimate of the sustainable yield. The ELPMA reference was not updated. The 2021-2022 extraction of 23,800 AFY is 2,300 AFY higher than the upper end estimate of the sustainable yield for the ELPMA (21,500 AFY, inclusive of pumping within the Epworth Gravels). Consistent with the GSP, the sustainable yield includes the Epworth Gravels. Page 91 has been updated to note this.
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.	Added
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.	Revised.
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	Revised.
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.	Noted. This is correcting an omission in the GSP.
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.	Revised.
BB-EC-12	Bryan Bondy	Editorial	--	Table 4-4		--	WY 2022 Epworth Gravels Aquifer extraction value appears anomalously low. Consider investigating and/or footnoting.	This is the correct value, although the reported extraction value had to be estimated from the AMI data and may be lower than the actual volume produced.
BB-EC-13	Bryan Bondy	Editorial	--	Table 4-4		--	Please footnote table to clarify whether values include Calleguas MWD extractions.	This table does not include the CMWD extractions. A footnote has been added to the table.
BB-EC-14	Bryan Bondy	Editorial	--	68-69		--	Something is wrong with the transition from p. 68 to p. 69.	Noted. Thank you for your comment.
BB-EC-15	Bryan Bondy	Editorial	--	86	Section 5.2.2.2.1	--	Second bullet – the wrong model is referenced.	Revised.
BB-EC-16	Bryan Bondy	Editorial	--	Table 6-1		--	Explanation for footnote “a” is missing.	Footnote designation was added in error. Table has been revised.
BB-EC-17	Bryan Bondy	Editorial	--	98		--	“CGMA” s/b “FCGMA”	Revised.
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.	The Watermaster relies on other agencies for monitoring data and agrees that the monitoring in LPVB can be improved. All available data collected during the March and October have been included in the evaluation. The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible.
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.	The introductory text to the projects and management actions section of the GSP Evaluation provides context for the reader on the additional work that has been done since the GSP was adopted as well as the work that is mandated by the Judgment. FCGMA continued to work on the projects identified in the GSP, and solicited additional projects after the GSP was adopted. FCGMA also provides a detailed list of the actions taken by the agency since the GSP adoption in section 7 of the GSP periodic evaluation. The statement that UWCD's updates to the Coastal Plain model are "the only substantive management action that had moved forward in the LPVB" is a mischaracterization of the extensive work that is documented in the periodic evaluation. Furthermore, the improvements to the Coastal Plain model represent a technical improvement, but are not a management action.

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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).	There are no monitoring wells screened solely in the GCA. This is a data gap that FCGMA has sought to fill by pursuing SGM grant funding for monitoring wells in the LPVB. The Watermaster plans to develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments. Watermaster staff continues to work to secure funding that can be used to install dedicated monitoring wells and fill data gaps, including in the GCA.
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?	The recharge area consists of undifferentiated outcrops of FCA and GCA. The text and figure have been revised accordingly.
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?	Groundwater from the Upper San Pedro is being pulled down by groundwater production in the Fox Canyon aquifer. The Upper San Pedro is a principal source of recharge to the underlying aquifers. There are not enough data to suggest that groundwater quality changes are related to groundwater production, or that the groundwater quality in the Upper San Pedro is worse than the groundwater quality in the underlying FCA (see figures 2-19 through 2-23).
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.	FCGMA relies on other agencies with jurisdiction to monitor their respective wells and monitoring points. The agencies coordinate with each other, and FCGMA appreciates the professionals that collect the data from each agency and understands that each agency acts in good faith to access a monitoring point and collect data. As discussed above, The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells
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.	The particle tracks are presented to show the modeled influence of each scenario on seawater intrusion. These are relevant to the WLPMA, which is included within the model domain because it is hydrogeologically connected to the adjacent Oxnard Subbasin.
BA-8	Bob Abrams	Editorial	--	ES-1	Footnote 1	--	Not sure what this is referring to?	Typo has been corrected
BA-9	Bob Abrams	Editorial	--	ES-1	Footnote 2	*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.*	Need to explain how this apparent mismatch will be managed in the document and in future. Water Year and Court Water Year (when required)?	Clarification added to footnote.
BA-10	Bob Abrams	Editorial	--	ES-2	--	*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.*	Not clear what this sentence achieves? Suggest re-wording or deleting.	This sentence is to advise DWR that there may be impacts to the implementation of the LPVB GSP that are not currently understood. Future GSP evaluations may need to explain how implementation has differed from what is presented here, and the reasons why.
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?	The lack of aquifer specific wells was discussed thoroughly in the GSP and is presented clearly in the GSP evaluation. The Watermaster will develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments to provide funding to install additional dedicated monitoring wells and transducers. There are no monitoring wells screened solely in the GCA in the WLPMA and only one in the ELPMA. This is a data gap that FCGMA has sought to fill by pursuing SGM grant funding for monitoring wells in the LPVB.
BA-12	Bob Abrams	Editorial	--	ES-2	--	*Groundwater elevations central ELPMA near the CMWD ASR well field*	Suggested addition in red text: Groundwater elevations in central ELPMA near the CMWD ASR well field	Revised
BA-13	Bob Abrams	Editorial	--	ES-4	--	*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*	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"	This is a quote from the GSP and cannot be revised.
BA-14	Bob Abrams	Editorial and Technical	--	ES-4	--	*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,*	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,"	This evaluation is required, under SGMA, to cover both the technical and administrative implementation components as both impact the ability of an agency to successfully implement the GSP. "Administrative" has been added to the sentence as suggested.
BA-15	Bob Abrams	Technical	--	10	--	*Groundwater elevation was not measured in well 02N20W12MMW1 in water year 2024*	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.	Noted. FCGMA will work to include field notes, as appropriate, in the future.

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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.	Same as above.
BA-17	Bob Abrams	Editorial	--	13	FCA third paragraph	*Fall groundwater elevations decreased ~~from~~ by less than a foot to 48 feet*	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.	Revised
BA-18	Bob Abrams	Technical	--	13	GCA	*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.*	Explain the reasons and note that it remains an area of uncertainty? Otherwise, it looks like it is being glossed over.	The text has been revised to not that this remains an area of uncertainty.
BA-19	Bob Abrams	Editorial	--	15	--	*Fall 2023 groundwater elevations were below the 2025 interim milestones in ~~the~~ two of the key wells in the WLPMA*	typo	Revised
BA-20	Bob Abrams	Technical	--	19	1st paragraph	*The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.*	Is there any proposal to replace these two key wells with new or other wells? It would counterbalance the negative.	Yes. FCGMA is investigating whether these wells can still be used or need to be replaced.
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.	Table header has changed and clarification has been added to the footnote.
BA-22	Bob Abrams	Editorial	--	23	Table 2-4c	--	First column of "Outflow" is "Outflow to PV1" Should that be PVB?	Revised
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	Table has been corrected to reflect the designations in the GSP.
BA-24	Bob Abrams	Technical	--	28	4th paragraph ELPMA groundwater quality	*While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period*	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?	There are natural variations in water quality that can occur without being influenced by groundwater production. The key to determining whether groundwater production is causing, or exacerbating, degradation of groundwater quality is to look for both spatial and temporal trends in water quality samples. There are no consistent spatial and temporal trends that suggest water quality degradation is occurring as a result of groundwater production in the LPVB.
BA-25	Bob Abrams	Technical	--	28	2.5.2.1 WLPMA	*TDS concentration data do not indicate that groundwater production since 2015 has caused degradation of groundwater quality*	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?	The previous sentence was deleted from the text. There are not enough wells screened in the USP to generalize the trends. The TDS concentrations are presented in Figure 2-19.
BA-26	Bob Abrams	Editorial	--	40	3.1.2.3.2 last sentence	*A formal agreement to ensure future maintenance of these non-native flows will be evaluated ~~as~~ through the Basin Optimization Plan.*	typo	Revised
BA-27	Bob Abrams	Technical	--	41	Table 3-1	*Estimated Accrued Benefits at Completion: Recovery of groundwater levels that have contributed to seawater intrusion in the Oxnard Subbasin.*	Is not the biggest benefit of reduced groundwater production the reduced possibility of adverse effects, rather than a specific effect in Oxnard Subbasin?	Agreed. Revised.
BA-28	Bob Abrams	Technical	--	51	4.1.1.1.	*Projects have been identified to install additional monitoring wells and transducers in existing wells that would address data gaps in the ELPMA*	Why none in the WLPMA?	Monitoring wells were also proposed for the WLPMA (See Section 3.2.4 and 3.2.5). Typo in the text has been revised from "ELPMA" to "LPVB."
BA-29	Bob Abrams	Editorial	--	64	4.3.2.3	*Between 2003 and 2022, recycled water in the ELPMA was used exclusively for municipal and industrial uses.*	Missing word?	Revised
BA-30	Bob Abrams	Editorial	--	70	5.2.1.3	*climate change factors ~~.~~, with the noted exception that*	typo	Revised
BA-31	Bob Abrams	Editorial	--	73	5.2.2	*...model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS of the Oxnard Subbasin, ;*	typo	Revised
BA-32	Bob Abrams	Technical	--	226 and 228	Figures 5-23a, b	--	Why are the simulated hydrographs shifted by -60 and +70 feet?	The starting elevations of the model simulations differed from the observed elevations. Therefore the simulations were shifted to match the observed data.
BA-33	Bob Abrams	Technical	--	73	5.2.2	*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.*	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?	This is the same approach that was used in the GSP. The particle tracks are presented to show the modeled influence of each scenario on seawater intrusion. These are relevant to the WLPMA, which is included within the model domain because it is hydrogeologically connected to the adjacent Oxnard Subbasin.
BA-34	Bob Abrams	Editorial	--	89	--	*No New Projects Scenario Model Results*	Should this be 'Arundo Removal Scenario Model results'?	Text has been revised to "Projects Scenario"

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BA-35	Bob Abrams	Technical	--	97	6.2.2.	*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.*	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?	The GSP identified an appropriate number of key wells. However, as discussed above, additional wells with known screen intervals would improve the monitoring network. This is a data gap that FCGMA has sought to fill by pursuing SGM grant funding for monitoring wells in the LPVB. Additionally, the Watermaster plans to develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments that could be used to install additional dedicated monitoring wells and transducers.
BA-36	Bob Abrams	Editorial and Technical	--	98	6.2.2.1	*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*	Typo. Also, are GW elevations in the eastern part of WLPMA influenced by Oxnard? More likely wells in western part of WLPMA?	Revised. Well is in the western WLPMA, not the eastern WLPMA.
BA-37	Bob Abrams	Technical	--	98	6.2.2.1	*As noted above, FCGMA anticipates evaluating projects that help to fill these critical data gaps as part of the Basin Optimization Plan*	Insufficient urgency demonstrated? Only one new well installed since 2019.	Text has been revised and a sentence added to discuss seeking funding.
BA-38	Bob Abrams	Editorial	--	107	8.3	*with FCGMA holding regular meetings ~~with~~ to coordinate on projects*	typo	Revised
BA-39	Bob Abrams	Editorial	--	110	9.3	*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.*	Not clear what this sentence achieves? Suggest rewording or deleting (ame as p ES-2, above)	This sentence is to advise DWR that there may be impacts to the implementation of the LPVB GSP that are not currently understood. Future GSP evaluations may need to explain how implementation has differed from what is presented here, and the reasons why.
BA-40	Bob Abrams	Editorial	--	112	10	*~~Revisions~~ Reductions to the monitoring network, including the key well network*	The word "reduction" is a more accurate representation of facts	"Revisions" is the term used in DWR's guidance document.
TM-1	Tony Morgan	Editorial	--	ES-1	Table ES-1, 4th row, last column	--	subsidence is not discussed in Section 7.2	Revised
TM-2	Tony Morgan	Technical	--	7	2.2.1.1	*prevent chronic lowering of groundwater levels*	is chronic lowering of water levels currently a WLPMA condition? That message doesn't seem to be a prevalent message throughout the document.	As stated in the evaluation, the primary sustainability goal identified in the GSP for the LPVB is to "maintain a sufficient volume of groundwater in storage in each management area so that there is no significant and unreasonable net decline in groundwater or storage over wet and dry climatic cycles." Additionally, the GSP states that "the criterion used to define undesirable results for chronic lowering of groundwater levels in the eastern part of the WLPMA is groundwater levels that indicate a long-term decline over periods of drought and recovery." This has been added to the discussion of the sustainability goal in section 2.1
TM-3	Tony Morgan	Technical	--	7	2.2.1.2, first paragraph	*to limit the area of the FCA that would convert from confined to unconfined conditions with declining water levels,*	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?	The second paragraph of section 2.2.1.2 and Table 2-1 identify wells located within areas of the WLPMA subject to aquifer conversion to evaluate potential impacts to well operators.
TM-4	Tony Morgan	Technical	--	7	2.2.1.2, second paragraph	*would result in projected groundwater elevations that are below the top of the well screen in nine wells*	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.	The purpose of this review was to look at impacts to stakeholders within the area that was already designated as prone to conversion in the GSP.
TM-5	Tony Morgan	Editorial	--	24	2.3.2.1, Lower Aquifer System	*approximately 32,970 AF since 2015 (Table 2-5)*	value doesn't match Table 2-5	Revised
TM-6	Tony Morgan	Editorial	--	24	Table 2-5., West Las Posas / LAS row	--	-34,780+1,810 = -32,970	Corrected.
TM-7	Tony Morgan	Technical	--	26	2.5.1	*describe efforts to evaluate the connection between groundwater production and groundwater quality*	Was this accomplished in the document?	This effort is described in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
TM-8	Tony Morgan	Technical	--	26	2.5.1	*progress made toward evaluation of the causal relationship referenced in the GSP.*	Where is this addressed in the document?	This effort is described in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
TM-9	Tony Morgan	Technical	--	28	2.5.1.2, last paragraph	*While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period,*	Where are these data presented?	These data are presented in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
TM-10	Tony Morgan	Technical	--	32	2.6.2	*critical infrastructure*	What are the criticial infrastructure? Their location(s) are not shown on Fig 2-29.	Text has been revised to note that no critical infrastructure has been identified in the LPVB that could be impacted by land subsidence related to groundwater pumping.

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TM-11	Tony Morgan	Editorial	--	35	3	*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.*	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."	Revised to "are being"
TM-12	Tony Morgan	Technical	--	37	3.1.1.1.3, Impacts to beneficial uses and users	*potential groundwater-surface water connections.*	these connections are not highlighted/identified in this document. Why mention them here?	Deleted.
TM-13	Tony Morgan	Technical	--	39	3.1.2.1.2, Expected Benefits	*prevent declines in groundwater elevation, loss of storage, and land subsidence by*	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).	Revised to "undesirable results"
TM-14	Tony Morgan	Technical	--	39	3.1.2.1.2, Impacts to beneficial uses and users	*chronic lowering of groundwater levels,*	is chronic lowering of groundwater a risk in the WLPMA?	Chronic lowering of groundwater levels is a risk in the WLPMA.
TM-15	Tony Morgan	Editorial	--	40	3.1.2.3.2, Realized Benefits, second paragraph	*A formal agreement to ensure future maintenance of these non-native flows will be evaluated ~~as~~ through the Basin Optimization Plan.*	typo	Revised.
TM-16	Tony Morgan	Editorial	--	41	Table 3-1, first row, second column	*Reduce Groundwater production by monitoring and imposing quantitative limits on pumpers; with governing authority from the FCGMA Board as the Watermaster .*	recommend adding red text	Added.
TM-17	Tony Morgan	Editorial	--	42	3.2.1.1	*decrease groundwater demand in the LPVB by 2,300 AFY.*	section below says groundwater demand would be decreased by 500 AFY	The text and tables have been revised.
TM-18	Tony Morgan	Editorial	--	42	3.2.1.2, Expected Benefits	*It is estimated that implementation of this project would decrease groundwater demand in the LPVB by approximately 500 AFY.*	paragraph above says groundwater demand would be decreased by 2,300 AFY	The text and tables have been revised.
TM-19	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	*which directly addresses undesirable results associated with degraded water quality,*	what degraded water quality impacts are attributable to the GSP's management of the basin?	Text has been revised to note the origin of the water quality degradation.
TM-20	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	*reducing groundwater demands in the LPVB.*	how does the pumping of groundwater to supply the desalter achieve a reduction in groundwater demands?	Deleted.
TM-21	Tony Morgan	Technical	--	43	3.2.1.2, Impacts to beneficial uses and users	*helping to prevent groundwater elevation declines*	the desalter needs a source of water to treat - groundwater. Not clear how this project reduces groundwater demand and therefore prevents groundwater elevation decline.	Deleted.
TM-22	Tony Morgan	Technical	--	44	3.2.3.1	*would provide up to 2,000 AFY of recharge.*	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?	The initial benefit analysis was provided by VCWWD-1, the project proponent. The answers to your question should be explored in more detail when conducting further feasibility analysis of this specific project, which is outside the scope of the GSP evaluation.
TM-23	Tony Morgan	Technical	--	45	3.2.4.1	*would provide data on whether the vegetation in the riparian corridor relies on groundwater or soil moisture from infiltrating surface water.*	other sections stated that vegetation is not dependent on groundwater. This seems to be backtracking on the conclusions offered elsewhere.	Revised
TM-24	Tony Morgan	Editorial	--	54	4.3.2.1	*approximately 35,100 AFY of groundwater*	Recommend changing to "...an average of approximately 35,100 AFY of groundwater..."	Revised
TM-25	Tony Morgan	Technical	--	77	Table 5-2, first column, second row	*Seawater Flux into the Oxnard Subbasin* [b]	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?	Uncertainty has been added to the footnote of the table.
TM-26	Tony Morgan	Editorial	--	77	Table 5-2, footnotes	--	Last footnote should be 'd'	Revised
TM-27	Tony Morgan	Technical	--	98	6.2.2.3	*13 wells that were to be monitored for groundwater quality are no longer monitored for groundwater quality.*	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 ??.	Revised wording to reflect correction from CMWD
TM-28	Tony Morgan	Technical	--	99	6.4	*monitor subsidence*	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?	This will be reported in the regular GSP annual report. Thus far, no critical infrastructure has been identified by stakeholders in the LPVB that may be subject to significant and unreasonable land subsidence that substantially interferes with surface land uses.
TM-29	Tony Morgan	Editorial	--	103	7.1.3	*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.*	This paragraph seems to fit better in 7.1.2 Extraction Allocations.	Revised

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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	*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*	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?	FCGMA is the groundwater sustainability agency (GSA) and the special act water agency designated by the Legislature to manage and conserve the LPV Basin's groundwater resources. (Judgment, § 3.3.) The judgment appoints FCGMA to be Watermaster for the LPV Basin. (Judgment, § 3.3.) "[T]he Judgment unites the FCGMA's role as the GSA for the Basin with its responsibilities as Watermaster" and tasks FCGMA to "continue in its role as the GSA for the Basin, fulfilling its SGMA statutory obligation, and will simultaneously integrate those regulatory responsibilities and authorities with its role as Watermaster under the Judgment." (Judgment, § 3.3.) The judgment provides "to the extent that it is feasible and cost-effective, Watermaster shall seek to augment the Basin Optimization Yield, and ultimately the Sustainable Yield, to be no less than 40,000 AFY." (Judgment, § 4.9.1.2). The judgment requires the Watermaster to prepare a Basin Optimization Plan on a five-year basis to identify the projects "that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable." (Judgment, § 5.3.2.2). Potential projects are identified and discussed in section 3.2 of the GSP Evaluation.
TM-31	Tony Morgan	Technical	--	Appendix A, A-1	A.1	*identify specific locations where Arroyo Simi-Las Posas is connected to the underlying aquifer and*	Is there a map or ?? showing these locations?	There is no current map showing these locations
TM-32	Tony Morgan	Technical	--	Appendix A, A-2	A.2, first paragraph on page	*recharge of the surface water discharges*	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?	Text has been revised.
TM-33	Tony Morgan	Technical	--	Appendix A, A-2	A.3, last sentence in first paragraph	*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.*	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.	The sentence has been modified to be specific to the observation. The intent is not to say that the two are disconnected, just that the increased pumping over the last 15 years hasn't impacted the water levels in the shallow aquifer. There are multiple potential reasons for the pumping not to have impacted the water levels. These could be explored in the future if needed.
TM-34	Tony Morgan	Technical	--	Appendix A, A-2	A.4, first paragraph	*interconnected surface water bodies*	Were the interconnected surface water bodies identified?	Specific reaches of Arroyo Simi-Las Posas may be interconnected, but no recent work has been done to verify this. FCGMA sought funding to install additional monitoring wells to update the understanding of the connection between the aquifers, but did not receive funding. Installation of additional monitoring wells and updating the understanding of gaining and losing reaches of Arroyo Simi-Las Posas are projects that should be pursued over the upcoming years.
TM-35	Tony Morgan	Editorial	--	Appendix A, A-2	A.4, first paragraph	*has not occurred in relation to current groundwater production, although this could occur in the future if upstream surface water discharges decrease.*	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."	Text has been revised to state "Depletions of interconnected surface water bodies could occur in the future if upstream surface water discharges decrease."
CT-1	Chad Taylor	Editorial	--	1	Table 1-1, fourth row, second column	*As a result, FCGMA anticipates approximately more flow in Arroyo Simi-Las Posas than previously assumed for the GSP*	Is this a typo, or should a value of additional flow be included here?	Typo - "approximately" has been removed
CT-1	Chad Taylor	Technical	--	1	Table 1-1	*Infrastructure Improvements to Zone Mutual Water Company's water delivery system*	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.	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	2	Table 1-1	*Projects to Address Data Gaps, Installation of Additional Groundwater Monitoring Wells and Installation of Additional Groundwater Monitoring Wells*	These are important projects that should be advanced quickly. See later comments on monitoring adequacy.	Agreed.
CT-1	Chad Taylor	Editorial	--	4	2.1, second paragraph on page	*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.*	Typo	Revised
CT-1	Chad Taylor	Technical	--	7	2.2.1.2, second paragraph	*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).*	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.	Well use has been added to the table
CT-1	Chad Taylor	Technical	--	8	Table 2-1, 6th column	--	18 percent of wells (4 of 22) with reduced capacity seems high	Noted. Thank you for your comment.
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.	Noted. Thank you for your comment.

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CT-1	Chad Taylor	Technical	--	8	2.2.1.2, second paragraph on page	*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.*	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?	A discussion of the impacts at the MOs has been added to the text. The discussion of potential impacts refers back to the selection of the 20% storage loss threshold evaluated in the GSP, as a level of significance for the FCGMA board. Development of a dry well mitigation program is a good suggestion for future evaluation.
CT-1	Chad Taylor	Technical	--	9	2.2.1.3, first paragraph	*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.*	Can this practice be incorporated into a management action?	This practice is covered under Management Action Number 1 in the GSP - Reduction in Groundwater Production.
CT-1	Chad Taylor	Editorial	--	9	2.2.1.3, second paragraph	*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.*	This paragraph seems out of place. Is it supposed to follow the header for 2.2.2?	Moved.
CT-1	Chad Taylor	Editorial	--	9	2.2.2.1 Upper San Pedro Formation	*There are no key wells screened in the USP because it is not a **primary** aquifer…*	Should primary be principal?	Revised
CT-1	Chad Taylor	Technical	--	9	2.2.2.1 Fox Canyon Aquifer	*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).*	These statements are based solely on one monitoring well at the extreme western end of the WLPMA. That data limitation should be discussed somewhere.	Text was added to further note the limitations of the data. The figures are presented with the text so that all readers can see the data collected and used to develop the discussion in the text.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1, first paragraph on page	*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.*	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.	Noted. The text is referencing a difference in the geographic water level changes in the fall, only. It is not comparing the difference between the fall and spring changes, because of the lack of data. The text has been revised to clarify this distinction.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1 Grimes Canyon Aquifer	*Two wells, 02N21W28A02S and 02N21W22G01S, had groundwater elevations measured in both spring 2015 and spring 2024.*	Spring to spring declines with no fall comparison due to inconsistent monitoring should raise concern.	Noted. Thank you for your comment.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, first paragraph	*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).*	Recommend referencing relevant section discussing Interim Milestones.	Section reference has been added
CT-1	Chad Taylor	Technical	--	14	2.2.3.1, second paragraph	*FCGMA has relied on other agencies for monitoring data but recognizes the need for more consistent monitoring of groundwater elevations in the WLPMA*	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.	The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible. The referenced sentence is out of place here though and has been deleted.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, second paragraph	*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.*	This seems a weak statement without further explanation of the mechanisms for increased groundwater elevations. Specifically, "anticipates' and "will rise" are very passive.	Agreed that this sentence is out of place in this section and has been deleted.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.2	*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).*	Typo	Revised

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CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	*measured in three of the five key wells were measured in three of the five key wells*	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.	The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.2, first paragraph on page	*...minimum thresholds (Table 2-1).*	Table 2-2?	Revised
CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	*Spring 2024 groundwater elevations were above the minimum threshold groundwater elevations at all of the key wells measured in the WLPMA*	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.	Noted. Text has been revised where appropriate. As discussed in previous responses, Watermaster will work to formalize agreements with monitoring partners to improve monitoring data.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	*Fall 2023 groundwater elevations were below the 2025 interim milestones in the two the key wells*	missing word	Revised
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	*established interim milestones (Table 2-1).*	Table 2-2?	Revised
CT-1	Chad Taylor	Technical	--	17	2.2.5.3	*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*	This makes it sound like there is uncertainty regarding the effectiveness of the thresholds. Can this be strengthened, or is there significant uncertainty?	Sufficient uncertainty exists to warrant the use of the qualifier in this statement.
CT-1	Chad Taylor	Technical	--	19	2.2.5.3, last sentence of first paragraph on page	*The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.*	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.	Noted. The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if 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.	As referenced in the text, the discussion of undesirable results and impacts to beneficial uses and users of groundwater is presented in section 2.2.4 and 2.2.5.2, because the change in storage undesirable results are tied to the groundwater elevation undesirable results.
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.	Sum has been added to the table and a sentence has been added to section 2.3.1.2
CT-1	Chad Taylor	Technical	--	24	2.3.2.1, Lower Aquifer System	*During the 2004 through 2010 period, the VRGWFM estimates that groundwater in storage in the LAS increased by approximately 1,810 AF (Table 2-5).*	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.	This was discussed in section 2.3.2 and in a footnote to section 2.3.1.2, but the text has been expanded in section 2.3.2 and the footnote has been added to the main text in section 2.3.1.2 for clarity.
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?	Revised
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	Table 2-4C includes change storage for all model layers, including the Upper San Pedro Formation. Table 2-5 only reports storage change for the principal aquifers in the model. The text has been revised and expanded to explain the difference.
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.	This effort is described in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
CT-1	Chad Taylor	Technical	--	27	2.5.1.1	*Water quality in this area has been impacted by historical land uses and is generally tied to groundwater elevation (FCGMA 2019).*	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.	This is discussed further in the GSP, which is referenced in the sentence discussed, and specifically refers to the western part of the WLPMA where work was done prior to the GSP to develop the relationship between groundwater quality and groundwater level. The sentence does not apply to the entire LPVB.
CT-1	Chad Taylor	Technical	--	31	2.5.4	*changes in the groundwater quality do not appear to be correlated with decreases in groundwater elevation.*	Section 2.5.1.1. says there is a relationship. See comment on that section.	The text has been revised to distinguish the link between groundwater levels and water quality in the western and eastern portions of the WLPMA.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
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.	Noted. The project description was solicited as part of the FCGMA Board project prioritization process that commenced prior to formation of the TAC. The project description provided by the project proponent was used to incorporate the project into the model for the GSP evaluation. Revisions to the project description are planned for the Basin Optimization Plan.
CT-1	Chad Taylor	Technical	--	44	3.2.4	--	Recommend advancing this project as quickly as possible	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	45	3.2.5	--	Recommend advancing this project as quickly as possible	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	51	4.1.1.1, second paragraph	*These revisions are described in FCGMA (2024a).*	Please include information regarding the understanding of the LPVB and relevant information about the connection to Oxnard in this document.	The changes described are specific to the Oxnard Subbasin and are more appropriately described in the first periodic evaluation for the Oxnard Subbasin. The reference is provided for the interested reader.
CT-1	Chad Taylor	Technical	--	55	4.3.2.1, Comparison to Projected Groundwater Supplies	*approximately 10% lower than the average annual groundwater extractions over the 2021 and 2022 water years.*	42,400 - 36,100 = 6,300 AFY, and 6,300/42,400 = 15% (14.858).	Revised.
CT-1	Chad Taylor	Technical and Editorial	--	67	5.1.1, third paragraph	*These updates are summarized in FCGMA (2024a).*	Please include all new information relevant to the LPVB in this document	The changes described are specific to the Oxnard Subbasin and are more appropriately described in the first periodic evaluation for the Oxnard Subbasin. The reference is provided for the interested reader.
CT-1	Chad Taylor	Technical	--	68	5.1.1, first paragraph on page	*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.*	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.	The Watermaster agrees that reconciliation of the models used could improve the understanding of the impact of management actions and projects in the LPVB and the interconnectedness of the basins. As stated in the next paragraph, "FCGMA anticipates coordinating with UWCD, in consultation with the LPVB TAC, to better coordinate the representation of this boundary between the ELPMA and WLPMA in both LPVB models."
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.1, third paragraph on page	*A broader discussion of updates to the Coastal Plain Model will be detailed in a technical memorandum prepared by UWCD.*	Where is this document? This seems like important information for the LPVB 5-Year GSP Evaluation	UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this comment response matrix was prepared, UWCD has not yet finalized this supplemental documentation.
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.2.1	*The ELPMA model extension, and validation, will be detailed in a technical memorandum prepared by FCGMA.*	When will this be available? Shouldn't this be available for committee review?	The tech memo was released with the final periodic evaluation.
CT-1	Chad Taylor	Editorial	--	69	5.1.2.1, first sentence on page	*simulation of future groundwater conditions.*	Sentence fragment	Not found in document.
CT-1	Chad Taylor	Technical	--	73	5.2.2	--	How do flows between WLPMA and ELPMA differ in the two models?	This is discussed in section 5.1.1
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.	The 20% reduction references a 20% reduction in demand in the numerical model. However, in the Oxnard and Pleasant Valley basin, reduced demand may not result in a 20% reduction in groundwater production as surface water is used conjunctively to meet demand.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield without Future Projects	*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).*	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.	The sustainable yield of the WLPMA is based on the minimized production reduction scenario that resulted in no net seawater intrusion in the Oxnard Subbasin over the sustaining period. This is based on the method used in the GSP. But the method used to estimate sustainable yield in the GSP evaluation improves on the previous method, as requested by stakeholders, by conducting iterative model runs to reach a sustainable pumping rate for the Oxnard Subbasin, Pleasant Valley Basin, and WLPMA, collectively, as these basins are hydrogeologically interconnected. The Watermaster welcomes suggested improvements to the modeling and sustainable yield calculation for discussion and potential incorporation into the BOY and future GSP evaluations. The GSP evaluation includes both a single sustainable yield estimate, by management area, and an uncertainty range. The range of sustainable yield presented in the GSP evaluation represents the uncertainty bounds around the single sustainable yield value. A detailed description of the quantitative uncertainty analysis is provided in section 2.4.5 of the GSP. This evaluation does not change or update that uncertainty analysis.
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.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with Future Projects, third paragraph	*the sustainable yield of the WLPMA may be as high as approximately 13,040 AFY or as low as 10,640 AFY.*	Please explain how this range was estimated.	The detailed description of the quantitative uncertainty analysis is provided in the GSP.
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.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	91	5.2.3.1, Sustainable Yield with UWCD's EBB Water Treatment Project, second paragraph on page	*approximately 14,700 AFY or as low as 12,300 AFY.*	Please explain how this range was estimated.	The detailed description of the uncertainty calculation is provided in the GSP.
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.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield without Future Projects, second paragraph	--	Please explain how this range was estimated.	The detailed description of the uncertainty calculation is provided in the GSP.
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.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	97	6.2.2	--	See previous statements about consistency and the effects of data gaps on sustainable management.	Noted. Text has been revised, where appropriate, to clarify the discussion of data collection and filling of data gaps.
CT-1	Chad Taylor	Technical	--	97	6.2.2.1, last paragraph on page	*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):* *▪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?	Text has been added to state that the monitoring network is still adequate, but could be improved by replacement monitoring 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	The PAC and TAC are discussed in the last full paragraph of section 8.1